SCS ENGINEERS

Phase I Environmental Site Assessment

Assessor's Parcel Numbers 395-250-08, -09, -15, and -22 and 398-110-09, -10, and -75 14109, 14135, and 14173 Olde Highway 80, and 14207 Rios Canyon Road El Cajon, California

Record ID: PDS2014-GPA-14-005; PDS2014-REZ-14-004; PDS2014-TM-5590; PDS2014-STP-14-019; PDS2014-MUP-15-004

Environmental Log No.: PDS2014-ER-14-14013

Presented to:

SOUTH COAST DEVELOPMENT, LLC
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Solana Beach, California 92075
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June 24, 2014
Project Number: 01205547.04

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June 24, 2014
Project Number: 01205547.04

Mr. Keith Gregory
South Coast Development, LLC
PO Box 1053
Solana Beach, California 92075

Subject: **Phase I Environmental Site Assessment (Assessment)**

Site: **Assessor's Parcel Numbers 395-250-08, -09, -15, and -22 and 398-110-09, -10, and -75**
14109, 14135, and 14173 Olde Highway 80 and 14207 Rios Canyon Road
El Cajon, California

Dear Mr. Gregory:

SCS Engineers (SCS) is pleased to present this report (Report) of the Assessment of the above-described Site. This Report summarizes the results of the Assessment that was conducted in order to evaluate the Site's current environmental conditions. The work described in this Report was performed by SCS in general accordance with Exhibit 04 to the Professional Services Contract (Contract) between SCS and South Coast Development, LLC. Exhibit 04 was executed on May 23, 2014 and the Contract was executed on November 9, 2005.

Because your full understanding of the Assessment is important to us, we recommend that you read the Report in its entirety. However, if time does not allow you a complete reading, summaries may be found in text boxes at the end of each section, and within our conclusion and recommendation. A glossary of terms commonly used in environmental assessments is also provided as an Appendix to this Report.

SCS enjoyed working with you on this project. Providing economical environmental solutions to meet your needs is more than our goal—it is our mission and the measure of our success. If we may assist you in any way, now or in the future, please do not hesitate to call our office at (858) 571-5500.

Sincerely,

Harry Bishop, PE
Project Professional
SCS ENGINEERS

Luke Montague, MESM, PG 8071
Senior Project Professional
SCS ENGINEERS

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1 BACKGROUND

Based on conversations with South Coast Development, LLC (Client), and a review of in-house databases, SCS Engineers (SCS) understands that the site consists of approximately 13.05 acres of land with addresses of 14109, 14135, and 14173 Olde Highway 80 and 14207 Rios Canyon Road, El Cajon, California (Site).

SCS understands that the Client is proposing to purchase and develop the above-referenced Site into an approximately 76,100-square-foot shopping center (Lake Jennings Market Place) with slab-on-grade construction. The Client stated that no soil export is planned. The portion of Pecan Park Lane between Olde Highway 80 and Rios Canyon Road that transects the Site will reportedly be closed and included in the proposed shopping center.

A review of our in-house ParcelQuest database of information from the County of San Diego Assessor's Office and conversations with the Client indicated the following in connection with the Site:

Assessor's Parcel Number (APN)	Address	Area	Description
395-250-08	None	0.30acres	Vacant land
395-250-09	14135 Olde Highway 80	0.80 acres	Vacant land
395-250-15	14173 Olde Highway 80	0.45 acres	Vacant Single-family residence (SFR)
395-250-22	None	0.60 acres	Vacant land
398-110-09	14109 Olde Highway 80	5.40 acres	Vacant SFR
398-110-10	14207 Rios Canyon Road	4.50 acres	Vacant land
398-110-75	None	1.00 acres	Vacant land

2 STANDARDS BACKGROUND

This Assessment was conducted in general accordance with the following:

- U.S. Environmental Protection Agency (EPA), 40 Code of Federal Regulations (CFR) Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule (AAI).
- American Society for Testing and Materials (ASTM) Standard Practice for Phase I Environmental Site Assessment Process E1527-13.
- The scope, conditions, and limitations of Exhibit 04 and the Contract.

The Client understands that the above-referenced EPA and ASTM standards were not developed to identify all environmental risk to property. The standards were developed to allow a user (Client) to qualify for the innocent purchaser defense, bona fide prospective purchaser defense, and contiguous property owner defense to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, a.k.a Superfund) liability. This Assessment is intended to constitute an appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice, as part of the due diligence

process required by CERCLA, the Superfund Amendments and Reauthorization Act of 1986, and the Small Business Liability Relief and Brownfields Revitalization Act of 2002 (collectively, Acts).

While this Assessment may initially qualify the Client for a CERCLA defense, after purchase, there may be "continuing obligations" that must be implemented in order to preserve this defense through the term of property ownership. There may be additional requirements under state law that also apply. The Client should contact qualified legal counsel regarding matters of liability, interpretation of the Acts, and potential continuing obligations. While it is outside the scope of this Assessment, SCS would be pleased to work with your legal counsel to develop and implement a strategy to preserve your CERCLA liability defenses through the term of your ownership.

This Assessment focused on potential sources of hazardous substances and petroleum products that could be considered a recognized environmental condition[1] and liability due to their presence in significant concentrations (e.g., above acceptable limits set by the federal, state, or local government) or due to the potential for exposure and risk due to contaminant migration and complete exposure pathways (e.g., soil vapor inhalation or groundwater ingestion). Materials that contain substances that are not currently deemed hazardous by the EPA or the California Environmental Protection Agency were not considered as part of this Assessment.

Unless specifically included in SCS' scope of services, building materials such as asbestos, lead-based paint, urea formaldehyde, and pressure-treated lumber, as well as lead in drinking water, are not considered in this Assessment, nor are building issues such as fire safety, indoor air quality (with the possible exception of vapor intrusion), mold, or similar matters. SCS did not evaluate the Site for compliance with land use, zoning, wetlands, or similar laws. This Assessment also excludes regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, and high-voltage power lines. This Assessment is not intended to be an environmental compliance audit.

Hazardous substances occurring naturally in plants, soils, and rocks (e.g., heavy metals, naturally occurring asbestos, and radon) are not typically considered in these investigations. Similarly, construction debris (e.g., discarded concrete, asphalt) is not considered, unless obvious indications suggest that hazardous substances are likely to be present in significant concentrations or likely to migrate.

An evaluation of business environmental risk associated with a parcel of commercial real estate may necessitate investigation beyond that included herein.

[1] *Recognized environmental conditions*, as defined by ASTM, include the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. However, the term is not intended to include *de minimis* conditions (a condition that generally present a threat to human health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies). A condition considered de minimis is not a recognized environmental condition.

3 OBJECTIVE

The objective of the scope of services was to assess the likelihood[2] that recognized environmental conditions are present at the Site as a result of the current or historical Site land use or from a known and reported off-Site source.

4 SCOPE OF SERVICES

The scope of services designed and conducted to meet the objective was as follows:

- Site Reconnaissance, Site Research, Interviews, and User Requirements
- Topography, Geology, Hydrogeology, and Water Quality Survey
- Site Vicinity Reconnaissance and Off-Site Source Survey
- Historical Site and Site Vicinity Land Use Review
- Identification of Data Gaps
- ata Evaluation, Figure Preparation, and Assessment Report Preparation

SITE RECONNAISSANCE

On May 29, 2014, SCS personnel conducted a Site reconnaissance to observe and document existing Site conditions.[i] The general Site location is shown in Figure 1, and a Site and Site vicinity plan is shown in Figure 2. Selected color photographs of the Site and Site vicinity are presented as Figures 3a through 3i.

The Site grounds and Site perimeter were systematically traversed on foot during the Site reconnaissance.

General Information

The following table summarizes general information in connection with the Site:

APNs	395-250-08, -09, -15, and -22 and 398-110-09, -10, and -75
Address	14109, 14135, and 14173 Olde Highway 80 and 14207 Rios Canyon Road, El Cajon, California
Area	13.05 acres
Site Land Use	Vacant SFRs and vacant land
Occupants	None

[2] Statements of "likelihood" are made in this Assessment, based on the professional judgment of SCS. A description of likelihood statements, as made in this Assessment, is included in the "Likelihood Statements" section.

Figure Reference	Figures 2 and 3a-1 through 3f-1 (for Site only)

Site Buildings

The following tables summarize information in connection with the Site buildings.

Number of Buildings	Two
Interpreted Construction Dates	1920 and 1950
Number of Stories	One
Construction Type	Wood-frame, wood and stucco-covered walls, and concrete slab-on grade foundations
Figure Reference	Figure 2 and Figures 3a-1 to 3f-1

Two SFRs and detached garages/sheds with addresses of 14109 and 14173 Olde Highway 80 were observed to be located adjacent (south) of Olde Highway 80 (Figures 2, 3b-1, 3b-2, 3e-2, and 3f-1). The buildings were observed to be in poor condition with broken walls and debris-covered floors.

Site Grounds

The Site grounds were observed to be vacant land covered with natural vegetation. A storm culvert beneath Olde Highway 80 was observed adjacent to the northern edge of the Site perimeter. A 55-gallon plastic drum containing an unknown liquid was observed on the Site near the intersection of Pecan Park Lane and Rios Canyon Road (Figure 3c-2) and piles of construction debris were observed near the western Site building (Figure 3e-1). The debris appeared to be confined to the surface and there was no observed evidence of waste burial. No obvious indications of the presence of hazardous substances or petroleum products were observed in and around the inspected debris and no indications of a release from the plastic drum were observed. Therefore, there is a low likelihood that the debris and/or drum at the Site represent a recognized environmental condition. However, SCS recommends that they be removed from the Site for disposal in accordance with applicable requirements. A natural drainage feature (Los Coches Creek) was observed to be located adjacent to the south perimeter of the Site.

Hazardous Materials/Petroleum Products

Hazardous materials and petroleum products were not observed to be used or stored at the Site.

Hazardous Wastes

No obvious indications of the generation of hazardous wastes were observed at the Site during the Site reconnaissance.

Indications of Releases of Hazardous Materials/Wastes or Petroleum Products

Indications of releases of hazardous materials/wastes or petroleum products were not noted during the Site reconnaissance.

On-Site Utilities

Gas and Electricity	San Diego Gas & Electric (SDG&E)
High-Power Transmission Lines	None observed
Storm Drains	None
Source of Heating and Cooling	SDG&E
Potable Water Source	Reported to be supplied by the Padre Dam Water District
Wastewater Conveyance	Reported to be provided by the Lakeside Sanitation District

One pole-mounted SDG&E transformer was observed to be located adjacent to the south perimeter of the Site. SDG&E was contacted regarding the possibility of polychlorinated biphenyls (PCBs) being present in transformers purchased by them. SDG&E reported that they have never specified PCBs in their transformers. A copy of a letter from SDG&E explaining this and their policy on testing for PCBs is included in the Appendices. No high-power transmission lines were observed above or adjacent to the Site. Based on the Site reconnaissance, the source of energy for heating and cooling at the Site is interpreted to be SDG&E.

With the exception of the plastic drum discussed in the Site Grounds section above, no obvious indications of wells, cisterns, pits, sumps, dry wells, or bulk storage tanks were observed at the Site. No septic tanks were observed during the Site reconnaissance; however, based on the rural location of the Site and the reported age of the Site buildings, septic tanks are interpreted to likely be present in the vicinity of the Site buildings. Possible environmental concerns with septic tank systems are that, to the extent they are used for other than domestic waste purposes (i.e., chemicals releases as waste water), they may act as a conduit for hazardous materials, petroleum products, and/or hazardous wastes to be released into the soil and possibly groundwater. Based on the interpreted domestic nature of the septic tank systems (associated with residential structures), there is a low likelihood that the septic tank system (if present) represents a recognized environmental condition.

If the Site is ever redeveloped, and a septic system does in fact exist at the Site, SCS recommends that the septic system be properly abandoned prior to Site redevelopment in accordance with applicable local laws and regulations.

Potential Asbestos-Containing Materials (ACMs)

During the Site visit, SCS personnel conducted a visual assessment of the readily available/ observable materials at the Site for potential ACMs. Potential ACMs observed at the Site included, but may not be limited to, sheet vinyl flooring material and mastic, vinyl composition tiles and mastic, drywall and joint compound, roofing materials, exterior stucco, etc. However, to quantify the asbestos content in a potential ACM, polarized light microscopy or another approved technique would have to be employed.

Based on the reported date of construction of these Site buildings (1920 and 1950), in general accordance with 29 CFR, surfacing materials (such as fireproofing and sprayed-on acoustic ceilings material) and thermal system insulation must be presumed to contain asbestos if installed in structures prior to 1981, unless sampling and laboratory analysis have determined that these are not asbestos-containing. Based on the age of the Site buildings, there is the potential for both friable and non-friable ACMs to be present at the Site.

SCS understands that the current Site buildings are proposed to be demolished. Based on the reported date of construction for the Site buildings (1920 and 1950), we recommend performing an asbestos and lead-based paint survey at the Site prior to demolition. Although the SFR reportedly constructed in 1920 may have been built before asbestos was commonly used, subsequent remodeling may have incorporated ACM. To comply with local requirements and regulations, and the EPA's National Emissions Standards for Hazardous Air Pollutants 40 CFR 61, Sub-part M, Section 61.145, Standards for Demolition and Renovation, all affected ACMs shall be removed from a building prior to demolition. This should be done by a licensed and qualified asbestos contractor in accordance with the EPA's Asbestos Hazard Emergency Response Act protocols. If ACMs are found to be present, we strongly recommend the Site owner(s) retain a third party company, reporting directly to the owner(s), to monitor the performance of the selected abatement contractor and the quality of work, and to "clear" the spaces upon completion of the abatement. In addition, bidding specifications should be prepared which provide performance standards for abatement conditions.

SITE RESEARCH

Regulatory Records Review

The County of San Diego Department of Environmental Health (DEH) was contacted[ii] and indicated that there are no regulatory files associated with the Site. A copy of the DEH response is included in the Appendices.

Fire Department Records Review

The City of Lakeside Fire Department (LSFD) was contacted regarding hazardous materials/waste or underground storage tank (UST) records for the Site[iii]. The LSFD reported that they have no files for the Site.

Building Department Records Review

The San Diego County Building Department (SDCBD) was contacted regarding building department records for the Site[iv]. The SDCBD reported that they had no records for the Site.

INTERVIEWS

The previously referenced EPA and ASTM standards require that attempts be made to conduct interviews with past and present owners and occupants of the Site to obtain information indicating recognized environmental conditions in connection with the Site. As part of this

Assessment, the following contacts were either interviewed, or attempts were made to conduct interviews.

Contact	Affiliation to Site	Description
Mr. Keith Gregory	Owner/Client	See User Requirements section below

Mr. Gregory stated that his company (South Coast Development Company, LLC) acquired the Site property over a period of several years (2003 to 2006). Mr. Gregory stated that a barn structure formerly located at 14135 Olde Highway 8 and a SFR formerly located at 14207 Rios Canyon Road, were demolished circa 2010 to 2011. Mr. Gregory stated that current Site buildings were constructed circa 1920 and 1950.

Mr. Gregory stated that, to his knowledge, hazardous materials and petroleum products have never been used or stored at the Site, hazardous wastes have never been generated at the Site, and there has never been a release of hazardous materials/wastes at the Site.

Mr. Gregory stated that to his knowledge fill soils have not been placed on the property and he is unaware of any environmental cleanup liens or activity and use limitations on the Site.

USER REQUIREMENTS

In order to qualify for one of the landowner liability protections offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (discussed in the Background section above), 40 CFR Part 312 requires that the user (Client) provide the following information to the environmental professional. Mr. Keith Gregory, President of South Coast Development, LLC, completed the User Questionnaire on May 21, 2014. The following table summarizes the responses by the Client.

Question	Response
Have environmental cleanup liens been filed or recorded against the Site?	No
Are activity or land use limitations in place at the Site or have they been filed or recorded in the registry?	No
Does the user have specialized knowledge or experience in connection with the Site?	No
Does the purchase price being paid for the Site reasonably reflect the fair market value of the Site?	N/A*
Is the Client aware of commonly known or reasonably ascertainable information about the Site, which would indicate releases or threatened releases?	No
Are there obvious indications that point to the presence of contamination at the Site?	No

Note:
N/A Property currently owned by Client

DATA GAPS IN CONNECTION WITH CURRENT SITE LAND USE

Based on observations and research, there are no obvious indications of data gaps in connection with the Site land use.

Findings and Opinions—Current Site Land Use
Based on observations and research, there is a low likelihood that a recognized environmental condition exists at the Site as a result of the current Site land use. The following environmental concerns in connection with the current Site buildings were identified: • Existing SFRs on-Site potentially contain asbestos and lead-based paint (LBP). • An asbestos and LBP assessment should be conducted on these structures prior to demolition.

TOPOGRAPHY, GEOLOGY, HYDROGEOLOGY AND WATER QUALITY SURVEY

Topography

A topographic map for the Site vicinity was reviewed and is summarized in the following table:

Reported Elevation	Approximately 660 to 700 feet above mean sea level
Reported Slope Direction	Gradually slopes down to the south and west
Source	United States Geological Survey 7.5 Minute Topographic Map, Alpine Quadrangle, California, 1988

Geology

A geological map for the Site vicinity was reviewed and is summarized in the following table.

Reported Formation	Medasedimentary rocks (Jurassic/Cetaceous)
Reported Description	Mildly Metamorphosed (greenchist facies), sandstone, siltstone, shale schist, quartzite metabasalt , Metatuff-breccias with gneiss fine grain gronodiorite tonolite
Source	Tan. S. S., *Geology of the El Cajon Quadrangle, San Diego County, California*, 2002.

Hydrogeology

Data regarding depth to groundwater and flow direction for the Site were not readily available. In the absence of Site-specific data, depth to groundwater and flow direction information was reviewed for properties within the Site vicinity using reports provided by the State Water Resources Control Board (SWRCB) Geotracker database. The following table summarizes the

results of this review. Please note that a natural drainage feature (Los Coches Creek) was observed to be located adjacent to the south perimeter of the Site.

Property Location	Adjacent (north) to the Site
Reported Depth	4 to 15 feet below grade
Reported Flow Direction	Southwest
Source	Stantec Consulting Service, *Quarterly Groundwater Monitoring Report, 14110 Old Highway 80, El Cajon, CA 92021*, dated January 2012

Many variables influence depth to groundwater and flow direction, and the actual depth to groundwater and flow direction at the Site may be different than presented in this section.

Water Quality Survey

The following table summarizes the reported water quality in the Site vicinity:

Reported Hydrologic Subarea	Coches (907.14)
Reported Hydrologic Area	Lower San Diego Mesa (907.1)
Reported Hydrologic Unit	San Diego (907)
Reported Beneficial Use	Designated as having beneficial use for municipal, agricultural, and industrial, and potential beneficial uses for processing purposes.
Source	RWQCB's "Comprehensive Water Quality Plan" (Plan) originally adopted in 1974, Amendments to the Plan, adopted in May 1998 by the RWQCB.

SITE VICINITY RECONNAISSANCE AND OFF-SITE SOURCE SURVEY

Current Site Vicinity Conditions

The following table summarizes land use and observations in the immediate Site vicinity[v]. For the purpose of this Report, the immediate Site vicinity includes those properties judged to be adjacent[3] to the Site.

[3] *Adjacent* is defined by ASTM E1527-13 as any real property or properties the border of which is contiguous or partially contiguous with that of the Site or that would be contiguous or partially contiguous with that of the Site but for a street, road, or other public thoroughfare separating them.

Direction	Land Use	Comments
North	14110 Olde Highway 80 - gasoline service station (7-Eleven) (Figure 3f-2) 14120 Olde Highway 80 - restaurant (Marechiaro's Pizza) 14134 Olde Highway 80 - liquor store (Hunter's Liquor) 14136 Olde Highway 80 - restaurant (Burger King) (Figure 3g-1) APN 395-250-21 (vacant land)	With the exception of the 7-Eleven gasoline service station (discussed in the Additional SCS Research section below), no obvious indications of the use, storage, or generation of hazardous materials/ wastes or petroleum products were observed.
East	14219 Olde Highway 80 - highway maintenance equipment storage (Luzaich Striping, Inc.) (Figure 3g-2) 14201 Rios Canyon Road/14215 Pecan Park Lane - Pecan Community Association (mobile home park) (Figure 3g-2)	
South	14106 Kelli Lane (SFR) (Figure 3h-2) 14106 Kelli Lane (SFR) 14118 Kelli Lane (SFR) 14134 Kelli Lane (SFR) 14239 Rios Canyon Road (SFR) APN 395-250-21 (vacant land) (Figure 3i-1) APN 398-110-60 (vacant land) APN 398-110-42 (vacant land) Los Coches Creek	
Southwest	14069 Ridge Hill Road - religious (East Valley Christian Fellowship of San Diego) (Figure 3i-2)	
West	Freeway off/on ramp	

Environmental Regulatory Database Report

An environmental regulatory database report (FirstSearch™ report) was prepared by Environmental Data Resources (EDR) for the Site. Local, state, and federal regulatory databases were reviewed for the Site and for those facilities within up to 1 mile of the Site. The FirstSearch™ report was reported to have been prepared in general accordance with the ASTM standard for the regulatory database review for Phase I Environmental Site Assessment. The locations of the referenced facilities relative to the Site are shown on the "Map of Sites Within One Mile," which is included in the FirstSearch™ report. A description of the various databases, as well as the date each database was most recently updated, is included in the FirstSearch™ report. The FirstSearch™ report is included in the Appendices to this Report.

Based on a review of the FirstSearch™ report, the following table summarizes the facilities within the selected search radii and whether the Site or a facility that was interpreted to be adjacent to the Site was listed on each database.

Federal or State Government Database	Search Radius	Number of Reported Facilities	On Site	Adjacent to the Site
National Priorities List (NPL)	1.00 mile	0	No	No
NPL delisted	1.00 mile	0	No	No

Federal or State Government Database	Search Radius	Number of Reported Facilities	On Site	Adjacent to the Site
Comprehensive Environmental Response Compensation and Liability System (CERCLIS)	0.50 mile	0	No	No
No Further Remedial Action Planned (NFRAP)	0.50 mile	0	No	No
Resource Conservation and Recovery Act-Corrective Action (RCRA COR ACT)	1.00 mile	0	No	No
RCRA Treatment and Disposal Facilities (RCRA TSD)	0.50 mile	0	No	No
RCRA Generators (RCRA Gen)	0.25 mile	0	No	No
Federal Engineering and Institutional Controls (IC/EC)	0.25 mile	0	No	No
Emergency Response Notification System (ERNS)	Site	0	No	NA
State/Tribal NPL	1.00 mile	0	No	No
State/Tribal CERCLIS (Envirostor)	1.00 mile	0	No	No
State/Tribal solid waste list (SWL)	0.50 mile	0	No	No
State/Tribal leaking underground storage tanks (LUST)	0.50 mile	7	No	Yes
State/Tribal underground/aboveground storage tanks (USTs/ASTs)	0.25 mile	2	No	No
State/Tribal voluntary cleanup program (VCP)	0.50 mile	0	No	No
State/Tribal Brownfields	0.50 mile	0	No	No
Other solid waste facilities (SWF)	0.50 mile	0	No	No
Other Tanks	0.25 mile	1	No	Yes
Other Hazard Sites	Site	0	No	N/A
Local land records	0.25 mile	0	No	No
Spills	Site	0	No	NA
Others (Haznet)	0.25 mile	3	No	Yes

Note:
NA: Not Applicable

The Site was not listed on any of the regulatory databases reviewed.

Off-Site facilities listed in the FirstSearch™ report were evaluated as to their potential to impact the Site. The databases included in the FirstSearch™ report can be grouped into two general categories: databases reporting unauthorized releases of hazardous substances or petroleum products (e.g., Leaking Underground Storage Tanks, RCRA Corrective Action facilities, National Priorities List [a.k.a. Superfund] sites), and databases reporting permitted hazardous materials users and hazardous waste generators, which have not necessarily experienced a release.

SCS evaluated each of the off-Site facilities listed in the FirstSearch™ report as to their potential to impact the Site, based on the following factors:

- Reported distance of the facility from the Site;[4]
- The nature of the database on which the facility is listed, and/or because the facility was not listed on a database reporting unauthorized releases of hazardous materials, petroleum products, or hazardous wastes;
- Reported case type (e.g., soil only, failed UST test only);
- Reported substance released (e.g., chlorinated solvents, gasoline, metals);
- Reported regulatory agency status (e.g., case closed, "no further action"); and/or
- Location of the facility with respect to the reported depth to and flow direction (discussed in the Hydrogeology section of this Report).

Based on one or more of the factors listed above, and with the possible exception listed in the Additional SCS Research section below, there is a low likelihood that the off-Site facilities listed in the FirstSearch™ report represent a recognized environmental condition in connection with the Site.

EDR listed 39 facilities as being orphans, which are facilities for which EDR does not have sufficient information to accurately locate them on a map. Based on a review of the orphans, with the possible exception of a highway maintenance company (Luzaich Striping, Inc.) located adjacent (east) to the Site at 14219 Olde Highway 80, none of the facilities are adjacent to the Site and no facilities having reported open releases were located within 0.20 miles of the Site.

This facility was listed on the Haznet database and is considered a facility for which there is a low likelihood of a recognized environmental condition for one or more of the reasons listed above.

Additional SCS Research

Regulatory Records Review

Based on its listing on the regulatory database and their proximity to the Site, the DEH file for the following adjacent facility was reviewed.

DEH File 20203 - 7-Eleven 14110 Olde Hwy 80 (located adjacent [north] to the Site)

This facility is listed on the LUST, San Diego SAM, and Sweeps UST databases. Based on the review of the DEH file, total petroleum hydrocarbon (TPH) concentrations of up to 8,400 milligrams per kilogram (mg/kg) were reportedly present in soils samples collected during a upgrade of the UST system in 1993 (SECOR International Inc. [SECOR], *Remediation System Shutdown, 14110 Old Highway 80, El Cajon, California*, dated September 2005) and a LUST case was opened. Approximately 18 cubic yards of TPH-bearing soil was reportedly

[4] Based on the project performance by the Lawrence Livermore National Laboratory for distribution and remediation of methyl tertiary butyl ether (MTBE) in groundwater, on the average, approximately 94 percent of the MTBE plumes studied in detail (as measured by MTBE in a concentration of 20 micrograms per liter [µg/L]) did not extend more than approximately 400 feet from the source, while approximately 89 percent of the benzene plumes (as measured by benzene in a concentration of 1 µg/L) extended less than 400 feet. Therefore, the detailed review radius for open groundwater cases has been conservatively established by SCS at 0.20 miles (approximately 1,000 feet).

removed during the UST upgrades. A total of 12 groundwater monitoring wells were reportedly installed to delineate the extent of TPH impact to soil and groundwater and a vapor extraction program was reportedly implemented (Stantec Consulting Corporation [SCC], *Limited Site Assessment Report, 14110 Old Highway 80, El Cajon, California*, dated August 2008 and SCC, *Quarterly Groundwater Monitoring Report 14110 Old Highway 80, El Cajon, California*, dated January 2012). The depth to groundwater was reported to be 4 to 15 feet below ground surface and the groundwater flow direction was reported to be southwest.

In a closure request submitted in 2012 (SCC, Addendum to Closure Request, *14110 Old Highway 80, El Cajon, California*, dated July 2012), SCC concluded that "no offsite receptors to the reported release were present within a one half mile radius of the facility and the remedial alternatives been effective in removing hydrocarbon impacts in the soil and groundwater." A closure letter was issued by the DEH on January 10, 2014. The DEH reportedly concurred with SCC's conclusions.

Based on the case status (closed), the location with respect to the reported groundwater flow direction (crossgradient), and the reported absence of constituents of concern (CoCs) in the groundwater monitoring wells nearest to the Site (MW-4, MW-5, and MW-12), there is a low likelihood that a recognized environmental condition exists at the Site as a result of this known and reported release.

The DEH files for this adjacent facility also included Compliance Inspection Reports (CIRs) from 1998 to 2002. These CIRs were also reviewed and are summarized in the table below.

Years Listed	Hazardous Waste (Quantities)	Violations
1993, 1995, 1996, 1997, 1998, 1999, 2001, 2002, 2003, 2005, 2006, 2008, 2009	Aqueous solution (1,300 gallons per year [gal/yr]) Organic solid waste (30 pounds per year [lb/yr])	Record keeping

Based on the types and quantities of hazardous waste reportedly generated at the facility, the regular inspections by the DEH, and the lack of known and reported releases, there is a low likelihood that a recognized environmental condition exists at the Site in connection with information obtained from the review of CIRs for this facility.

California Division of Oil, Gas, and Geothermal Resources

SCS personnel reviewed the California Division of Oil, Gas, and Geothermal Resources Map regarding oil and gas well locations within 1 mile of the Site[vi]. There were no wells interpreted to be located within a 1-mile radius of the Site.

DATA GAPS IN CONNECTION WITH OFF-SITE SOURCES

Based on a review of historical sources, there are no obvious indications of data gaps in connection with the historical Site and Site vicinity land use.

Findings and Opinions—Off-Site Source Survey
Based on the off-Site source survey, several facilities in the Site vicinity were reported to have had releases of hazardous materials/waste or petroleum products. However, there is a low likelihood that a recognized environmental condition exists at the Site as a result of known and reported releases of hazardous materials/wastes or petroleum products from an off-Site source. This judgment is based on one or more of the following: reported regulatory status (e.g., case closed), media affected (e.g., soil contamination only), distance from the Site, direction from the Site with respect to groundwater flow direction, and information obtained through a review of regulatory records.

HISTORICAL LAND USE REVIEW

In accordance with the ASTM Standard and AAI rule, numerous reasonably ascertainable standard historical information sources were reviewed, and an attempt was made to interpret the historical Site and Site vicinity land use back to the obvious first-developed use of the Site. The following table summarizes the historical resources reviewed as part of this Assessment:

Resource	Location	Years Available
Aerial Photographs	County of San Diego NETR Online (http://www.historicaerials.com)	1953, 1964, 1968, 1971, 1981, 1989, 2003, and 2005
City Directories	San Diego Public Library	1970, 1975, 1980, 1985, 1990, 1995, 2000, 2005, 2010, and 2013
Sanborn Fire Insurance Maps	SCS in-house collection	Coverage not available
Topographic Maps	US Geological Survey	1903, 1927, 1930, 1936, 1941, 1942, 1947, 1955, 1956, 1959, 1964, 1969, 1975, 1976, 1978, 1979, 1986, and 2001
Fire Department Records	LSFD	None available
Building Department Records	SDCBD	None available
Interviews	Not applicable	Please see Interview section above

Historical Site Land Use

The following table provides a chronology of the apparent historical Site land uses as interpreted from a review of information from the sources referenced.

Years	Interpreted Site Tenants	Interpreted Site Use
1903	None	No improvements shown (Site land use not specified on the topographic maps reviewed)
1920-1989	Various residents	SFRs/farm structures/agriculture land

Years	Interpreted Site Tenants	Interpreted Site Use
1990-2000	Various residents	SFRs/Vacant land
2005-2014	None	Vacant SFR and vacant land

Because many of the dates listed above are based on a limited selection of historical resources, they are considered to be approximations only; the actual beginning/ending dates for many of the Site uses/development described above may have been earlier or later than indicated.
With the possible exceptions of the potential presence of pesticides in soil due to the historical use of the Site for agricultural purposes, discussed below, no obvious historical facilities, features of concern, or land uses indicative of the use, storage, or generation of hazardous materials/wastes or petroleum products were found in the historical resources reviewed.

As indicated above, based on a review of historical resources, it is interpreted that agricultural activity took place at the southern portion of the Site (south of Pecan Park Lane) from prior to 1953 to prior to 1981. In addition, possibly agricultural related structures (barns or greenhouses) were present in historical aerial photographs. The agricultural activity is interpreted to have possibly taken place at the time when organochlorine pesticides such as dichlorodiphenyltrichloroethane (DDT), chlordane, and metal-based pesticides, such as copper and arsenic, were in wide general use for pest control.

These classes of pesticides are known to have the potential to remain detectable in the subsurface soil for extended periods of time. Based on the interpreted land use, SCS's experience with agricultural properties, and a review of the available literature, it is our judgment that it is likely that trace concentrations of organochlorine or metal-based pesticides are present in the soil at the Site and Site vicinity as a result of the agricultural land use. It has also been SCS's experience that trace concentrations are likely to be present even after mass grading and earth movement. However, it has generally been our experience that unless a pesticide mixing, storage, or disposal area was present, concentrations of organochlorine pesticides in the subsurface in general agricultural areas tend to be low. No such areas were reported or are known to have existed at the Site and Site vicinity.

While there are currently no regulations that stipulate cleanup levels for pesticides in soil, there is a level at which soil could be classified as a hazardous waste based on, for example, a DDT concentration. However, it has been SCS's experience that in order for pesticide-bearing soil at the Site and Site vicinity to be classified as a hazardous waste, the soil would first need to be classified as a "waste" (e.g., to be excavated and transported off-Site). In addition, it would need to have concentrations of pesticides, such as DDT, in excess of regulatory values, such as the total threshold limit or soluble threshold limit concentrations (TTLC/STLC) values, for specific pesticides in soil samples.

Based on our experience, if the Site were in fact used for agricultural purposes, there is a moderate likelihood that residual concentrations of organochlorine and metal-based pesticides are present in the shallow surface soil beneath the Site. Assuming the legal and permitted application of these pesticides, and assuming existing Site use remains the same, this common occurrence is, in SCS's experience, unlikely to lead to an enforcement action and is therefore likely to be considered *de minimis*, as defined by ASTM.

However, SCS understands that the Site is proposed to be redeveloped for commercial activities (shopping center) and will be covered with hardscape and landscape. Therefore, we recommend that limited soil sampling (of disturbed soil) be conducted as a precautionary measure to ensure construction workers and others are not exposed to elevated concentrations of pesticides, if present. In addition, if soil is to be excavated and exported as part of redevelopment activities, then the presence of pesticides and/or metals may result in the soil being considered a regulated or hazardous waste and the soil may need to be properly characterized and disposed of at an appropriate receiving facility.

Historical Site Vicinity Land Use

The following table provides a chronology of the apparent historical Site vicinity land uses as interpreted from a review of information from the sources referenced:

Years	Interpreted Site Tenants	Interpreted Site Use
14110 Olde Highway 80 (North)		
1903-1947	None	No improvements shown
1953-1968	Various residents	SFR
1971-1975	None	Vacant land
1976-2014	7-Eleven	Gasoline station and mini-mart
14120 Olde Highway 80 (North)		
1903-1947	None	No improvements shown
1953-1979	None	Vacant land
1980-2014	Marechiaro's Pizza	Restaurant
14134 Olde Highway 80 (North)		
1903-1947	None	No improvements shown
1953-1979	None	Vacant land
1980-2014	Hunter Liquor	Liquor store
14136 Olde Highway 80 (North)		
1903-1947	None	No improvements shown
1953-1995	None	Vacant land
2000-2014	Burger King	Restaurant
APN 395-250-21 Olde Highway 80 (North)		
1903-1947	None	No improvements shown
1953-2014	None	Vacant land
14219 Olde Highway 80 (East)		
1903-1947	None	No improvements shown
1953-2000	Various residents	SFRs

Years	Interpreted Site Tenants	Interpreted Site Use
2005-2014	Luzaich Stripping, Inc.	Highway painting contractor
14209 Rios Canyon Road (East)		
1903-1947	None	No improvements shown
1953-1968	Unknown	Agriculture
1970-2014	Pecan Community Association	Mobile home park
14239 Rios Canyon Road/14106 to 14134 Kelli Lane (South)		
1903-1947	None	No improvements shown
1953-1989	Unknown	Agriculture
1990-2014	Various residents	SFRs
APN 395-110-42 and -60 and 395-250-21(South)		
1903-1947	None	No improvements shown
1953-1989	Unknown	Agriculture
1990-2014	None	Vacant land
14069 Ridge Hill Road (Southwest)		
1903-1947	None	No improvements shown
1953-1964	Various residents	SFRs
1968-2014	East Valley Christian Fellowship of San Diego	Religious
Freeway Off-Ramp (West)		
1903-1947	None	No improvements shown
1953-1959	None	Vacant land
1964-2014	None	Freeway off-ramp

Because many of the dates listed above are based on a limited selection of historical resources, they are considered to be approximations only; the actual beginning/ending dates for many of the Site uses/development described above may have been earlier or later than indicated.

With the exception of historical closed LUST case, discussed in the Additional SCS Research section above, no obvious historical facilities, features of concern, or land uses indicative of the use, storage, or generation of hazardous materials/wastes or petroleum products were found in the historical resources reviewed.

DATA GAPS IN CONNECTION WITH THE HISTORICAL SITE LAND USE

Readily available historical information was limited, and information was not available that would provide 5-year data intervals between the following years: 1903 to 1927, 1930 to 1936, and 1947 to 1953. Based on the corroborating data from the historical information, SCS judged it likely that the historical Site land use during this time period was not significantly different from

the interpretation presented in the table above. The year portions of the Site was first developed (for SFRs) is interpreted to have been circa 1920.

Findings and Opinions—Historical Site and Site Vicinity Land Use

Based on a review of historical resources, and with the possible exceptions below, there is a low likelihood that a recognized environmental condition exists at the Site as a result of a release of hazardous materials/wastes or petroleum products from a known or interpreted historical Site or Site vicinity land use.

Based on a review of historical resources, it is interpreted that agricultural activity took place at the southern portion of the Site (south of Pecan Park Lane) from prior to 1953 to prior to 1981. In addition, possibly agricultural related structures (barns or greenhouses) were present in historical aerial photographs. The agricultural activity is interpreted to have possibly taken place at the time when organochlorine pesticides such as dichlorodiphenyltrichloroethane (DDT), chlordane, and metal-based pesticides, such as copper and arsenic, were in wide general use for pest control.

Based on our experience, if the Site were in fact used for agricultural purposes, there is a moderate likelihood that residual concentrations of organochlorine and metal-based pesticides are present in the shallow surface soil beneath the Site. Assuming the legal and permitted application of these pesticides, and assuming existing Site use remains the same, this common occurrence is, in SCS's experience, unlikely to lead to an enforcement action and is therefore likely to be considered *de minimis*, as defined by ASTM.

However, SCS understands that the Site is proposed to be redeveloped for commercial activities (shopping center) and will be covered with hardscape and landscape. Therefore, we recommend that limited soil sampling (of disturbed soil) be conducted as a precautionary measure to ensure construction workers and others are not exposed to elevated concentrations of pesticides, if present. In addition, if soil is to be excavated and exported as part of redevelopment activities, then the presence of pesticides and/or metals may result in the soil being considered a regulated or hazardous waste and the soil may need to be properly characterized and disposed of at an appropriate receiving facility.

5 CONCLUSIONS AND RECOMMENDATIONS

This Assessment has been conducted by an environmental professional whose qualifications[5] were made known to the Client. The conclusion and recommendations presented below are based on the review of readily available data obtained as part of this Assessment, current regulatory guidelines, the Site and Site vicinity reconnaissance, and SCS' experience.

[5] SCS declares that, to the best of our professional knowledge and belief, the reviewer meets the definition of Environmental Professional as defined in §312.10 of 40 CFR 312 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the All Appropriate Inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. The qualifications of the report preparers are included in the Appendices.

SCS has performed a Phase I Environmental Site Assessment of 14109, 14135, and 14173 Olde Highway 80 and 14207 Rios Canyon Road, El Cajon, California in general conformance with the American Society for Testing and Materials (ASTM) Standard Practice for Phase I Environmental Site Assessment Process E 1527-13 and the Environmental Protection Agency (EPA), 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule (AAI). Any exceptions to, or deletions from, the ASTM and AAI Scope of Work were previously described in this Report where applicable.

With the possible exceptions below, there is a low likelihood that recognized environmental conditions are present at the Site as a result of the current or historical Site land use or from a known and reported off-site source.

- Historical Agricultural Activities

  Based on a review of historical resources, it is interpreted that agricultural activity took place at the southern portion of the Site (south of Pecan Park Lane) from prior to 1953 to prior to 1981. In addition, possibly agricultural related structures (barns or greenhouses) were present in historical aerial photographs. The agricultural activity is interpreted to have possibly taken place at the time when organochlorine pesticides such as dichlorodiphenyltrichloroethane (DDT), chlordane, and metal-based pesticides, such as copper and arsenic, were in wide general use for pest control.

  Based on our experience, if the Site were in fact used for agricultural purposes, there is a moderate likelihood that residual concentrations of organochlorine and metal-based pesticides are present in the shallow surface soil beneath the Site. Assuming the legal and permitted application of these pesticides, and assuming existing Site use remains the same, this common occurrence is, in SCS's experience, unlikely to lead to an enforcement action and is therefore likely to be considered *de minimis*, as defined by ASTM.

  However, SCS understands that the Site is proposed to be redeveloped for commercial activities (shopping center) and will be covered with hardscape and landscape. Therefore, we recommend that limited soil sampling (of disturbed soil) be conducted as a precautionary measure to ensure construction workers and others are not exposed to elevated concentrations of pesticides, if present. In addition, if soil is to be excavated and exported as part of redevelopment activities, then the presence of pesticides and/or metals may result in the soil being considered a regulated or hazardous waste and the soil may need to be properly characterized and disposed of at an appropriate receiving facility.

This Report is intended for the sole usage of the Client and other parties designated by SCS. The methodology used during this Assessment was in general conformance with the requirements of the Client and the specifications and limitations presented in the Agreement between the Client and SCS. This Report contains information from a variety of public and other sources, and SCS makes no representation or warranty about the accuracy, reliability, suitability, or completeness of the information. Any use of this Report, whether by the Client or by a third party, shall be subject to the provisions of the Agreement between the Client and SCS. Any misuse of or reliance upon the Report shall be without risk or liability to SCS.

Assessments are qualitative, not comprehensive, in nature and may not identify all environmental problems or eliminate all risk. For every property, but especially for properties in older downtown or urban areas, it is possible for there to be unknown, unreported recognized environmental conditions, USTs, or other features of concern that might become apparent through demolition, construction, or excavation activities, etc. In addition, the scope of services for this project was limited to those items specifically named in the scope of services for this Report. Environmental issues not specifically addressed in the scope of services for this project are not included in this Report.

Land use, condition of the properties within the Site, and other factors may change over time. The information and conclusions of this Report are judged to be relevant at the time the work described in this Report was conducted. This Report should not be relied upon to represent future Site conditions unless a qualified consultant familiar with the practice of Phase I Environmental Site Assessments in the County of San Diego is consulted to assess the necessity of updating this Report.

The property owners at the Site are solely responsible for notifying all governmental agencies and the public of the existence, release, or disposal of any hazardous materials/wastes or petroleum products at the Site, whether before, during, or after the performance of SCS services. SCS assumes no responsibility or liability for any claim, loss of property value, damage, or injury that results from hazardous materials/wastes or petroleum products being present or encountered within the Site.

Although this Assessment has attempted to assess the likelihood that the Site has been impacted by a hazardous material/waste release, potential sources of impact may have escaped detection for reasons that include, but are not limited to: 1) inadequate or inaccurate information rightfully provided to SCS by third parties, such as public agencies and other outside sources; 2) the limited scope of this Assessment; and 3) the presence of undetected, unknown, or unreported environmental releases.

6 LIKELIHOOD STATEMENTS

Statements of “likelihood” have been made in this report. Likelihood statements are based on professional judgments of SCS. The term “likelihood,” as used herein, pertains to the probability of a match between the prediction for an event and its actual occurrence. The likelihood statement assigns a measure for a “degree of belief” for the match between the prediction for the event and the actual occurrence of the event.

The likelihood statements in this Report are made qualitatively (expressed in words). The qualitative terms can be approximately related to quantitative percentages. The term “low likelihood” is used by SCS to approximate a percentage range of 10 to 20 percent; the term “moderate likelihood” refers to an approximate percentage range of 40 to 60 percent; and the term “high likelihood” refers to an approximate percentage range of 80 to 90 percent.

7 SPECIAL CONTRACTUAL CONDITIONS BETWEEN USER AND ENVIRONMENTAL PROFESSIONAL

There were no special contractual conditions between the user of this Assessment and the environmental professional, SCS.

8 ENDNOTES

[i] Site reconnaissance conducted by Harry Bishop on May 29, 2014.

[ii] Records request - County of San Diego Department of Environmental Health by Harry Bishop (SCS) on May 28, 2014.

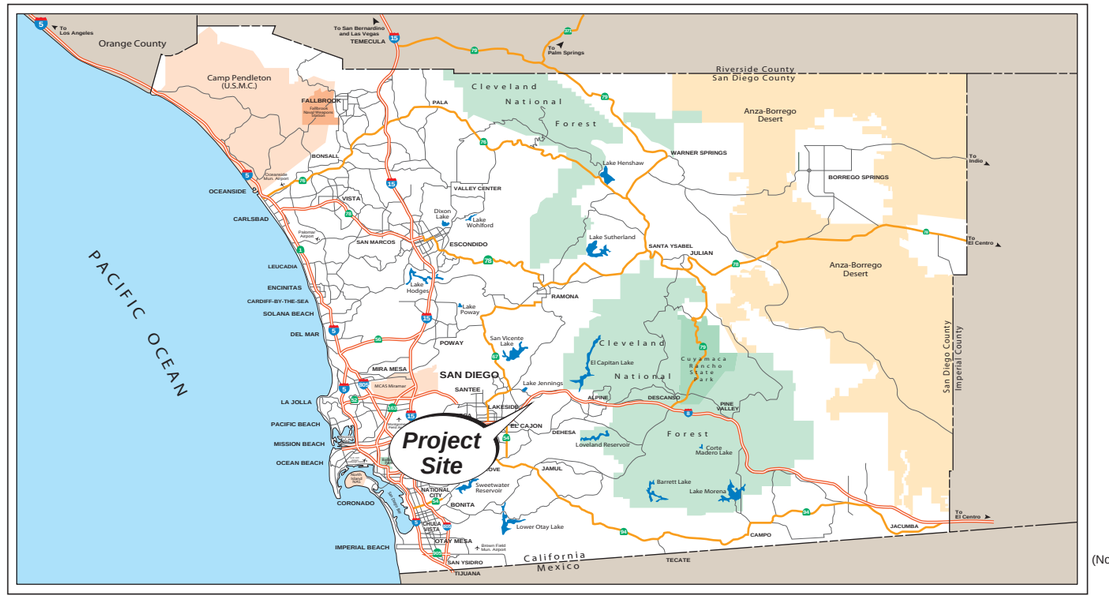
[iii] Records request - City of Lakeside Fire Department by Harry K. Bishop (SCS) May 29, 2014.

[iv] Records request – County of San Diego Building Department by Harry K. Bishop (SCS) on May 29, 2014.

[v] Site vicinity reconnaissance conducted by Harry Bishop (SCS) on May 29, 2014.

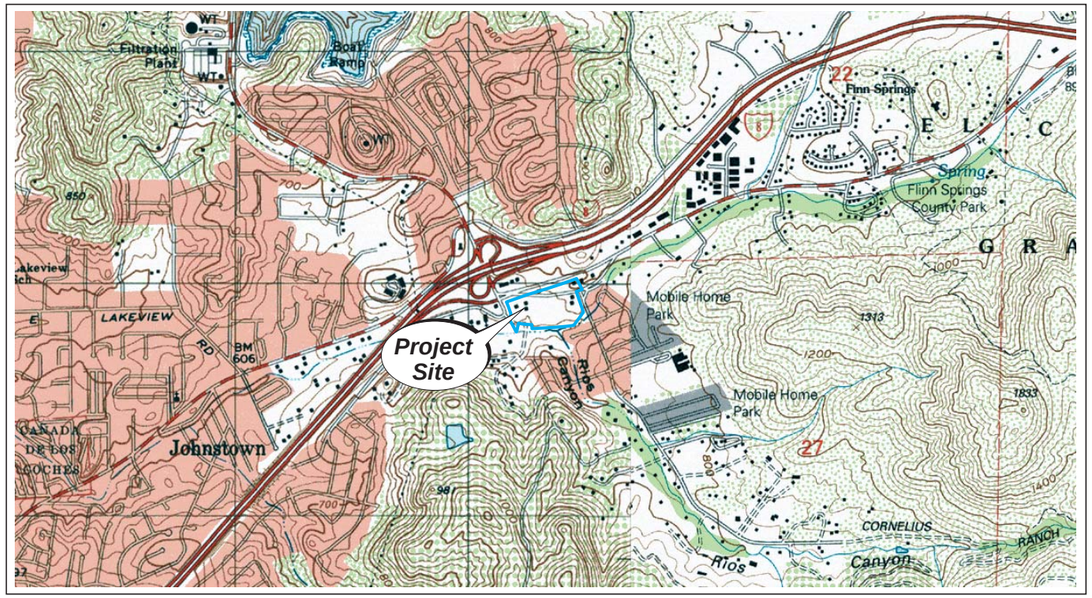
[vi] California Division of Oil, Gas, and Geothermal Resources (DOGGR) Regional Wildcat Map W1-7, 2009.

FIGURES



North
(Not to scale)

REGIONAL SITE LOCATION

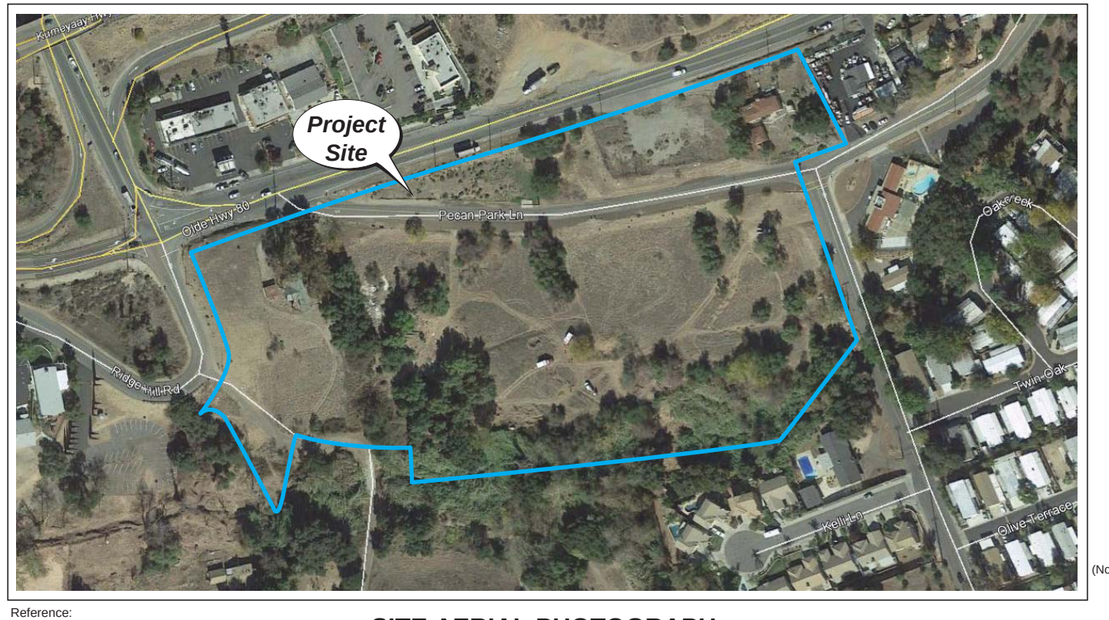


North
(Not to scale)

Reference:
U.S.G.S. 7.5 Minute Quadrangle Map
El Cajon, California - 1996

2-DIMENSIONAL SITE LOCATION

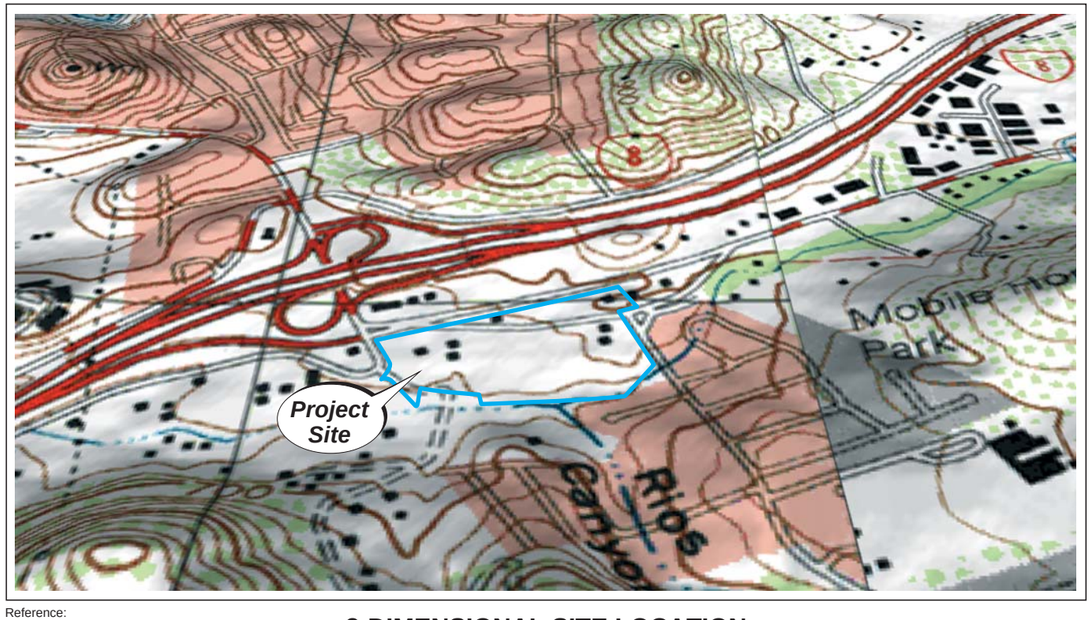
0 1,000 2,000 3,000
Approximate Graphic Scale in Feet



North
(Not to scale)

Reference:
Google Earth Aerial Photograph
El Cajon, California - November 2013

SITE AERIAL PHOTOGRAPH



North
(Not to scale)

Reference:
U.S.G.S. 7.5 Minute Quadrangle Map
El Cajon, California - 1996

3-DIMENSIONAL SITE LOCATION

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

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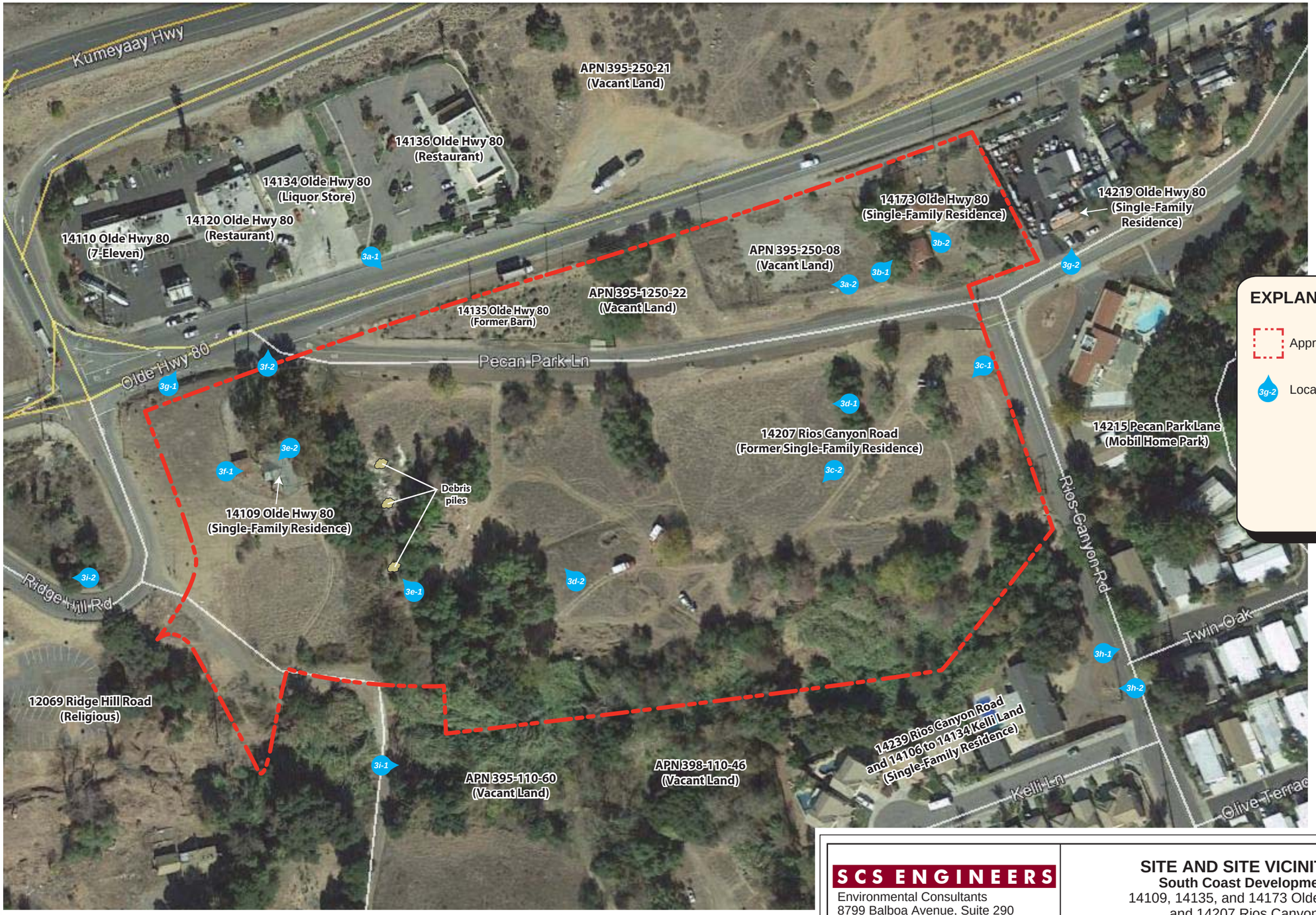
FOUR-WAY SITE LOCATION MAP
South Coast Development, LLC
14109, 14135, and 14173 Olde Highway 80
and 14207 Rios Canyon Road
El Cajon, California

Project No.: 01205547.04

Figure 1

Date Drafted: 6/16/14



EXPLANATION

- Approximate Site boundary
- Location and direction of Site photograph

North
Not to Scale

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

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SITE AND SITE VICINITY PLAN

South Coast Development, LLC
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and 14207 Rios Canyon Road
El Cajon, California

Project No.: 01205547.04

Figure 2

Date Drafted: 6/16/14

1) View of the northern portion of the Site looking southeast.

2) View of the northern portion of the Site looking west.

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PHOTOGRAPHIC PLATE
South Coast Development, LLC
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Figure 3a

Date Drafted: 6/11/14

1) View of eastern single-family residence.

2) Interior view of eastern single-family residence.

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PHOTOGRAPHIC PLATE
South Coast Development, LLC
14109, 14135, and 14173 Olde Highway 80
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Figure 3b

Date Drafted: 6/11/14

1) View of the southern portion of the Site looking south.

2) View of the southern portion of the Site looking southwest.

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PHOTOGRAPHIC PLATE
South Coast Development, LLC
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Figure 3c

Date Drafted: 6/11/14

1) View of the southern portion of the Site looking west.

2) View of the southern portion of the Site looking northwest.

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PHOTOGRAPHIC PLATE
South Coast Development, LLC
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Figure 3d

Date Drafted: 6/11/14

1) View of debris on the western portion of the Site.

2) View of western single-family residence.

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14109, 14135, and 14173 Olde Highway 80
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El Cajon, California

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Figure 3e

Date Drafted: 6/11/14

1) Interior view of western single-family residence.

2) View of the adjacent property to the north of the Site (7-Eleven).

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PHOTOGRAPHIC PLATE
South Coast Development, LLC
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El Cajon, California

Project No.: 01205547.04

Figure 3f

Date Drafted: 6/11/14

1) View of the adjacent property to the north of the Site.

2) View of the adjacent property to the east of the Site.

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PHOTOGRAPHIC PLATE
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Project No.: 01205547.04

Figure 3g

Date Drafted: 6/11/14

1) View of the adjacent property to the east of the Site.

2) View of the adjacent property to the south of the Site.

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PHOTOGRAPHIC PLATE
South Coast Development, LLC
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and 14207 Rios Canyon Road
El Cajon, California

Project No.: 01205547.04

Figure 3h

Date Drafted: 6/11/14

1) View of the adjacent property to the south of the Site.

2) View of the adjacent property to the east of the Site.

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PHOTOGRAPHIC PLATE
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and 14207 Rios Canyon Road
El Cajon, California

Project No.: 01205547.04

Figure 3i

Date Drafted: 6/11/14

APPENDICES

GLOSSARY

GLOSSARY

adjoining property. Any real property the border of which is contiguous or partially contiguous with that of the Site, or that would be contiguous or partially contiguous with that of the Site but for a street, road, or other public thoroughfare separating them.

aerial photographs. Photographs taken from an airplane or helicopter of areas encompassing the Site.

asbestos. Six naturally occurring fibrous minerals found in certain types of rock formations. Of the six, the minerals chrysotile, amosite, and crocidolite have been the most commonly used in building products. When inhaled in sufficient quantities, asbestos fibers can cause serious health problems.

asbestos-containing material (ACM). Any material or product that contains more than 1% asbestos.

construction debris. Any concrete, brick, asphalt, and other building materials discarded in the construction of a building or other improvement to property.

de minimis condition. An environmental condition that does not generally present a material risk of harm to the public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

drum. A container (typically, but not necessarily, holding 55 gallons of liquid) that may be used to store hazardous substances or petroleum products.

dry well. Underground areas where soil has been removed and replaced with pea gravel, coarse sand, or large rocks. Dry wells are used for drainage, to control storm runoff, for the collection of spilled liquids (spilled intentionally or not), and for wastewater disposal (often illegal).

fill dirt. Dirt, soil, sand, or other earth that is obtained off site and that is used to fill holes or depressions, create mounds, or otherwise artificially change the grade or elevation of real property. It does not include material that is used in limited quantities for normal landscaping activities.

fire insurance map. Maps produced for private fire insurance map companies that indicate uses of properties at specified dates and that encompass the property.

hazardous material. Any material that, because of its quantity, concentration, or physical and chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health or safety of persons or harmful to the environment if released into the workplace or the environment.

hazardous substance. Pursuant to CERCLA, hazardous substances include the following:

1) All toxic pollutants and hazardous substances listed under the Clean Water Act
2) Hazardous wastes regulated under RCRA
3) Any hazardous air pollutant under the Clean Air Act
4) Chemicals designated as "immediately hazardous" under the Toxic Substance Control Act

The EPA is also allowed to designate additional substances as hazardous if they present a substantial danger to the public health or welfare or the environment when released.

hazardous waste. A substance defined pursuant to the Solid Waste Disposal Act amended by RCRA, a hazardous waste is a solid waste, or a combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics, may contribute to an increase in mortality or an increase in serious irreversible, or incapacitating illness or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

landfill. A place or area of land used for the disposal of solid wastes as defined by state solid waste regulations. Synonymous with the term *solid waste disposal site*, a landfill is also known as a garbage dump or trash dump.

likelihood. As used in this Report, the term *likelihood* pertains to the probability of a match between the prediction of an event and its actual occurrence. As used by SCS Engineers, the term *low likelihood* approximates a percentage range to 10 to 20 percent; *moderate likelihood* approximates 40 to 60 percent; and *high likelihood* approximates 80 to 90 percent.

Material Safety Data Sheet (MSDS). Written or printed material concerning a hazardous substance which is prepared by chemical manufacturers, importers, and employers for hazardous chemicals pursuant to OSHA standards.

obvious. That which is plain or evident. The term refers to a condition or fact that could not be ignored or overlooked by a reasonable observer while physically observing the property.

PCE. Perchloroethene/perchloroethylene, or "Perc"; also tetrachloroethene/tetrachloroethylene; commonly used as a solvent for dry-cleaning.

petroleum products. Petroleum, including crude oil, natural gas, natural gas liquids, liquefied natural gas, synthetic gas usable for fuel, kerosene, diesel oil, jet fuels, motor oil, hydraulic oil, gear oils, and fuel oil.

recognized environmental conditions (RECs). Recognized environmental conditions, as defined by the American Society for Testing and Materials (ASTM), include the presence or likely presence of hazardous substances or petroleum products on a property that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water on the property. However, the term is not intended to include de minimis conditions that do not generally present a material risk of harm to the public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

retail quantities (RQs). Quantities of hazardous materials usually less than 50 gallons, 100 pounds, or 200 cubic feet of gas (under the regulatory reporting limits).

small retail quantities (SRQs). Quantities of hazardous materials in containers of 5 gallons or less, and less than 50 gallons in aggregate.

solvent. A chemical compound that is capable of dissolving another substance and is itself a hazardous substance, such as TCE, TCA, PCE, Stoddard solvent, paint thinner, mineral spirits, and acetone. Solvents are used in a number of manufacturing or industrial processes.

TCA. Trichloroethane; also 1,1,1 TCA; a commonly used industrial solvent for degreasing/cleaning.

underground storage tank (UST). Any tank, including underground piping connected to the tank, that is

or has been used to contain hazardous substances or petroleum products and the volume of which is 10 percent or more beneath the surface of the ground.

visually and/or physically observed. This term refers to observations made by vision during the Site visit while walking through the Site or Site building(s), and observations made by the sense of smell, particularly awareness of noxious or foul odors.

ACRONYMS

µg/kg	micrograms per kilogram
µg/L	micrograms per liter
ARAR	Applicable, Relevant, and Appropriate Requirements
ASPIS	Abandoned Sites Program Information System
APCD	Air Pollution Control District
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BAT	Best Available Technology
bg	below grade
bgs	below ground surface
BMP	Best Management Practice
BTEX	benzene, toluene, ethylbenzene, and xylenes
Cal-EPA	California Environmental Protection Agency
CCDC	Centre City Development Corporation
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CGI	Combustible Gas Indicator
CHSP	Community Health and Safety Plan
CIR	Compliance Inspection Report
CoCs	Constituents of Concern
CPT	Cone Penetration Testing
DAF	Dilution and Attenuation Factor
DDT	Dichlorodiphenyltrichloroethane
DEED RSTR	California Department of Health Services Deed Restriction
DEH	County of San Diego Department of Environmental Health
DTSC	Department of Toxic Substance Control
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment

FoPC	Features of Potential Concern
HMMD	Hazardous Materials Management Division, County of San Diego
HVAC	heating, ventilation, and air conditioning
HVOCs	halogenated volatile organic compounds
HWSSL	Hazardous Waste and Substances Sites List
IDW	investigation-derived wastes
IPM	integrated pest management
JURMP	Jurisdictional Urban Runoff Management Program
LEL	lower explosive limit
LESA	Limited Environmental Site Assessment
LNAPL	Light Nonaqueous Phase Liquid
LOA	Letter of Authorization
LUFT	leaking underground fuel tank
LUST	leaking underground storage tank
mg/kg	milligrams per kilogram
MIWD	Metropolitan Industrial Wastewater Division
MSCP	Multiple Species Conservation Plan
MSDS	Material Safety Data Sheet
MTBE	methyl tertiary butyl ether; *also* methyl tert-butyl ether
NA	not applicable
NCP	National Contingency Plan
ND	not detected
NESSHAPS	National Emissions Standards for Hazardous Air Pollutants
NFA	no further action
NFRAP	No Further Remedial Action Plan
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
OLS	ordinary least squared
OSHA	Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PCE	perchloroethene/perchloroethylene, *or* "Perc"; *also* tetrachloroethene/tetrachloroethylene
PEAR	Preliminary Environmental Assessments Required
PID	photoionization detector
PMP	Property Mitigation Plan
PAHs	polynuclear aromatic hydrocarbons
PRG	Preliminary Remediation Goals
PRP	potentially responsible party (pursuant to CERCLA)
PSH	phase-separated hydrocarbons

QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
RCRA VIOL	Comprehensive Environmental Response, Compensation and Liability Act–hazardous waste generators violations/enforcement actions
RCRIS-G	Comprehensive Environmental Response, Compensation, and Liability Act Information System–Generators (hazardous waste)
REC	recognized environmental condition
RF	remote fill
RNA	remediation by natural attenuation
RQs	retail quantities
RWQCB	Regional Water Quality Control Board
SAM	Site Assessment and Mitigation Program (San Diego County Department of Environmental Health)
SAP	Site Assessment Protocol
SCL	Department of Toxic Substance Control database
SDG&E	San Diego Gas and Electric
SI	site inspection
SRQs	small retail quantities
SMP	Soil Management Plan
SPCC	Spill Prevention Control and Countermeasure
STLC	Soluble Threshold Limit Concentration
SWAT	Solid Waste Assessment Test
SWIS	Solid Waste Information System
SWLF	Solid Waste Landfills
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCA	Trichloroethane; also 1,1,1 TCA
TCE	trichloroethene; trichloroethylene
TCLP	Toxicity Characteristic Leaching Procedure
THF	Tetrahydrofuran
TPH	total petroleum hydrocarbons
TPHg	TPH as gasoline
TPHd	TPH as diesel
TPHext	TPH extended range
TPHo	TPH oil range
TRIS	Toxic Release Information System
TRPH	total recoverable petroleum hydrocarbons
TTLCs	Total Threshold Limit Concentrations
UAR	unauthorized release
USGS	United States Geological Survey
UST	underground storage tank

VAP	Voluntary Action Plan
VES	Vapor Extraction System
WDR	Waste Discharge Requirements
WET	Waste Extraction Test
WMUDS	Waste Management Unit Database System

SAN DIEGO GAS & ELECTRIC LETTER

SDGE Southern California Gas Company

Sempra Energy utilities

Willis G. Brull
Principal Environmental Specialist

Environmental Services—Hazardous Materials/Waste
6875 Consolidated Way
San Diego, CA 92121-2602

Telephone: (858) 547-3069
Fax: (858)547-6529
E-Mail: jbrull@semprautilities.com

March 7, 2008

Mr. Ralph Vasquez
Environmental Business Solutions
8799 Balboa Avenue #290
San Diego, CA 92123

SAN DIEGO GAS & ELECTRIC (SDG&E) PCB TRANSFORMERS

Dear Mr. Vasquez,

This letter is in response to your inquiry on March 5, 2008 regarding the transformers purchased by San Diego Gas & Electric (SDG&E).

SDG&E has never specified PCB transformers for its distribution system. Although only mineral oil transformers were purchased, some older, pre 1980, mineral oil transformers were inadvertently contaminated with PCBs by the manufacturer.

Based on the SDG&E statistical sampling and testing program, it is unlikely that the SDG&E equipment is PCB contaminated. The only way to know with certainty is by testing.

SDG&E is responsible for ensuring that its transformers comply with EPA regulations governing PCBs. However, EPA regulations do not require the testing of individual mineral oil transformers. Therefore, should you wish for that to be done, there will be a charge associated with the testing and if a service interruption is deemed necessary then there will be additional charges for any high voltage line work and associated labor costs.

Please call me at (858) 547-3069 if you need additional information.

Sincerely,

Willis G. Brull
Principal Environmental Specialist

REGULATORY RECORDS FOR THE SITE

OFFICE USE ONLY
Request # 5-351

County of San Diego

JACK MILLER
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
(858) 505-6700 FAX (858) 505-6848
www.sdcdeh.org

ELIZABETH POZZEBON
ASSISTANT DIRECTOR

PUBLIC RECORDS REQUEST FOR THE SITE ASSESSMENT AND MITIGATION (SAM) PROGRAM AND HAZARDOUS MATERIALS DIVISION (HMD)

Harry K. Bishop, PhD, PE
Senior Project Professional

SCS ENGINEERS
Environmental Consultants and Contractors

8799 Balboa Avenue, Suite 290
San Diego, CA 92123-1568
858 571-5500 x242
Fax 858 571-5357
hbishop@scsengineers.com
www.scsengineers.com

___ E-Mail: _____

___ FAX: ( ) _____

(overprint with business card if preferred)

Additional information may be accessed ... the DEH website, www.sdcdeh.org. Fax or email your completed form to the Public Records Program at (858) 505-6848 or deh.publicrecords@sdcounty.ca.gov. The following information is required. Separate forms are needed for each address or parcel number.

14207 Rios Canyon Rd El Cajon 92021 or _____
Exact Address (Street, City and Zip Code) Assessor's Parcel Number

Optional information (establishment permit number, business name, etc.):

Please indicate the purpose of your search by checking all that apply:

- ☐ Contaminated Property Investigation(s) (SAM Cases)
- ☐ SAM Closure Letter/Report
- ☐ Hazardous Materials Permit & Underground Storage Tank Files (HMD/UST)
- ☐ Other: _____ (specify)
- ☐ Monitoring Well Files (select conditions that apply)
  - ☐ Government agency request
  - ☐ Consultant with related case
  - ☐ Written authorization from owner (attach letter)

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Files copied for: _____ of _____ Date: / /

Request cancelled by: _____ Date: / /

Photocopies _____ Cost _____ Picked up/mailed on _____ By _____

A search for DEH records checked above has been conducted and the following apply:

☐ SAM files for the permit number(s) listed below are available.
_____ # _____ # _____ # _____ # _____

☐ HMD/UST files for the permit number(s) listed below are available.
_____ # _____ # _____ # _____ # _____

☐ Original records were purged. Database-only records are available (at: http://sdcounty.ca.gov/deh/doing_business/hazmat_search.html) for the following permit number(s):
_____ # _____ # _____ # _____ # _____

☑ No SAM/HMD/UST records were found for the address/APN you requested.

JEllma
Signature - DEH Representative

6/4/14
Date

DEH complies fully with the California Public Records Act and the Federal Freedom of Information Act. Please be advised that photocopy and/or scanned file fees may apply.

DEH-9098 (Rev. 12/12)

OFFICE USE ONLY
Request # 5350

County of San Diego

JACK MILLER
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
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(858) 505-6700 FAX (858) 505-6848
www.sdcdeh.org

ELIZABETH POZZEBON
ASSISTANT DIRECTOR

PUBLIC RECORDS REQUEST FOR THE SITE ASSESSMENT AND MITIGATION (SAM) PROGRAM AND HAZARDOUS MATERIALS DIVISION (HMD)

Harry K. Bishop, PhD, PE
Senior Project Professional

SCS ENGINEERS
Environmental Consultants and Contractors

8799 Balboa Avenue, Suite 290
San Diego, CA 92123-1568
858 571-5500 x242
Fax 858 571-5357
hbishop@scsengineers.com
www.scsengineers.com

E-Mail:
FAX: ( )
(overprint with business card if preferred)

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14173 Old Highway 80 El Cajon 92021 or
Exact Address (Street, City and Zip Code) Assessor's Parcel Number

Optional information (establishment permit number, business name, etc.):

Please indicate the purpose of your search by checking all that apply:

- ☐ Contaminated Property Investigation(s) (SAM Cases)
- ☐ SAM Closure Letter/Report
- ☐ Hazardous Materials Permit & Underground Storage Tank Files (HMD/UST)
- ☐ Other: _____ (specify)
- ☐ Monitoring Well Files (select conditions that apply)
  - ☐ Government agency request
  - ☐ Consultant with related case
  - ☐ Written authorization from owner (attach letter)

OFFICE USE ONLY BELOW THIS LINE

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Files copied for: _____ of _____ Date: / /
Request cancelled by: _____ Date: / /
Photocopies _____ Cost _____ Picked up/mailed on _____ By _____

A search for DEH records checked above has been conducted and the following apply:

- ☐ SAM files for the permit number(s) listed below are available.
  # _____ # _____ # _____ # _____ # _____
- ☐ HMD/UST files for the permit number(s) listed below are available.
  # _____ # _____ # _____ # _____ # _____
- ☐ Original records were purged. Database-only records are available (at: http://sdcounty.ca.gov/deh/doing_business/hazmat_search.html) for the following permit number(s):
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- ☑ No SAM/HMD/UST records were found for the address/APN you requested.

JEllma
Signature - DEH Representative

6, 4, 14
Date

DEH complies fully with the California Public Records Act and the Federal Freedom of Information Act. Please be advised that photocopy and/or scanned file fees may apply.

DEH-9098 (Rev. 12/12)

OFFICE USE ONLY
Request # 5-349

County of San Diego

JACK MILLER
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL HEALTH
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
(858) 505-6700 FAX (858) 505-6848
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ELIZABETH POZZEBON
ASSISTANT DIRECTOR

PUBLIC RECORDS REQUEST FOR THE SITE ASSESSMENT AND MITIGATION (SAM) PROGRAM AND HAZARDOUS MATERIALS DIVISION (HMD)

Harry K. Bishop, PhD, PE
Senior Project Professional

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14135 Olde Highway 80 El Cajon 92021 or
Exact Address (Street, City and Zip Code) Assessor's Parcel Number

Optional information (establishment permit number, business name, etc.):

Please indicate the purpose of your search by checking all that apply:

- ☐ Contaminated Property Investigation(s) (SAM Cases)
- ☐ SAM Closure Letter/Report
- ☐ Hazardous Materials Permit & Underground Storage Tank Files (HMD/UST)
- ☐ Other: _____ (specify)
- ☐ Monitoring Well Files (select conditions that apply)
  - ☐ Government agency request
  - ☐ Consultant with related case
  - ☐ Written authorization from owner (attach letter)

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_____ # _____ # _____ # _____ # _____

☐ Original records were purged. Database-only records are available (at: http://sdcounty.ca.gov/deh/doing_business/hazmat_search.html) for the following permit number(s):
_____ # _____ # _____ # _____ # _____

☑ No SAM/HMD/UST records were found for the address/APN you requested.

JEllma
Signature - DEH Representative

6, 4, 14
Date

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DEH-9098 (Rev. 12/12)

5/27

OFFICE USE ONLY
Request # 5-348

County of San Diego

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DIRECTOR

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E-Mail:
FAX: ( )
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Additional information may be accessed from the DEH website, www.sdcdeh.org. Fax or email your completed form to the Public Records Program at (858) 505-6848 or deh.publicrecords@sdcounty.ca.gov. The following information is required. Separate forms are needed for each address or parcel number.

14109 Old Highway 80 El Cajon 92021 or
Exact Address (Street, City and Zip Code) Assessor's Parcel Number

Optional information (establishment permit number, business name, etc.):

Please indicate the purpose of your search by checking all that apply:

- ☐ Contaminated Property Investigation(s) (SAM Cases)
- ☐ SAM Closure Letter/Report
- ☐ Hazardous Materials Permit & Underground Storage Tank Files (HMD/UST)
- ☐ Other: _____ (specify)
- ☐ Monitoring Well Files (select conditions that apply)
  - ☐ Government agency request
  - ☐ Consultant with related case
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- ☐ HMD/UST files for the permit number(s) listed below are available.
  # _____ # _____ # _____ # _____ # _____
- ☐ Original records were purged. Database-only records are available (at: http://sdcounty.ca.gov/deh/doing_business/hazmat_search.html) for the following permit number(s):
  # _____ # _____ # _____ # _____ # _____
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JEllmer
Signature - DEH Representative

6/4/14
Date

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DEH-9098 (Rev. 12/12)

USER QUESTIONNAIRES

ATTACHMENT A
USER QUESTIONNAIRE

One of the primary reasons an Environmental Site Assessment or Phase I (ESA) is completed for a real estate transaction is to document due diligence efforts and "all appropriate inquiry," thereby satisfying certain elements required by CERCLA in order to qualify for a Landowner Liability Protection or LLP.

LLP is the term used to describe the three types of potential defenses to Superfund (CERCLA) liability in EPA's Interim Guidance Regarding Criteria Landowners Must Meet in Order to Qualify for Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner Limitations on CERCLA Liability ("Common Elements" Guide) issued on March 6, 2003.

In order to qualify for one of the LLPs offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "Brownfields Amendments"), 40 CFR Part 312 requires that the user must provide the following information (if available) to the environmental professional. Failure to provide this information could result in a determination that the "all appropriate inquiry" is incomplete.

This "Users Questionnaire" is outside the scope of work of the environmental professional completing an ESA for a user. When completed, return the questionnaire either by mail, e-mail, or fax to the environmental professional prior to the site reconnaissance so your responses can be used and incorporated into the final ESA report by the environmental professional as required by 40 CFR Part 312.

(1) Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25)

Are you aware of environmental cleanup liens against the property that are filed or recorded under federal, tribal, state or local law? ☐ Yes ☑ No If Yes, please describe:

(2) Activity and land use limitations (AUL's) that are in place on the site or that have been filled or recorded in a registry (40 CFR 312.26).

Are you aware of any AUL, such as engineering controls, land use restrictions or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local laws? ☐ Yes ☑ No If Yes, please describe:

(3) Specialized knowledge or experience of the person seeking to qualify for LLP (40 CFR 312.28)

As the user of this ESA do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business? ☐ Yes ☑ No If Yes, please explain:

(4) Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29)

Does the purchase price being paid for this property reasonably reflect the fair market value of the property? ☑ Yes ☐ No

If the purchase price is lower than fair market value, do you conclude that is because contamination is known or believed to be present at the property? ☐ Yes ☐ No If Yes, please explain:

SCO LLC OWNS THE PROPERTY

(5) Commonly known or reasonably ascertainable information about the property (40 CFR 312.30)

Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example, as user,

(a) Do you know the past use(s) of the property? ☑ **Yes** ☐ **No** **If Yes, please describe**:

SMALL FARMING

(b) Do you know specific chemicals that are present or once were present at the property? ☐ **Yes** ☑ **No** **If Yes, please describe:**

(c) Do you know of spills or other chemical releases that have taken place at the property? ☐ **Yes** ☑ **No** **If Yes, please describe:**

(d) Do you know of any environmental cleanups that have taken place at the property? ☐ **Yes** ☑ **No** **If Yes, please describe:**

(6) The degree of obviousness of the presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31)

As the user of this ESA, based on your knowledge and experience related to the property are there any obvious indications that point to the presence or likely presence of contamination of the property? ☐ **Yes** ☑ **No** **If Yes, please explain:**

Please attach additional sheets and additional information as needed to complete this questionnaire.

South COAST DEVELOPMENT LLC
[Company Name]

Sign: Keith Gregory

Print Name: KEITH GREGORY

Title: PRES. South COAST DEVELOPMENT MANAGER

Date: 5/21/14

ADDITIONAL INFORMATION

In addition, certain information should be collected, if available, and provided to the environmental professional selected to conduct the Phase I. This information is intended to assist the environmental professional but is not necessarily required to qualify for one of the LLPs. The information includes:

(a) The reason the Phase I is required:
SAN DIEGO COUNTY REQUIRED it

(b) The type of property and type of property transaction, for example, sale, purchase, exchange, etc.:
VACANT LAND - ENTITLEMENT PROCESS

(c) The complete and correct address of the property (a map or other documentation showing property location and boundaries is helpful):
ALREADY PROVIDED

(d) The scope of services desired for the Phase I (including whether any parties to the property transaction may have a required standard scope of services on whether any consideration beyond the requirements of Practice 1527 are to be considered):
STANDARD SCOPE

(e) Identification of all parties who will rely on the Phase I report:
South COAST DEVELOPMENT LLC
COUNTY OF SAN DIEGO

(f) Identification of the site contact and how the contact can be reached:
KEITH GREGORY
858-720-6675
619-991-9829
KEITH AT SCD2.COM

(g) Any special terms and conditions which must be agreed upon by the environmental professional:

NO

(h) Any other knowledge or experience with the property that may be pertinent to the environmental professional (for example, copies of any available prior environmental site assessment reports, documents, correspondence, etc., concerning the property and its environmental condition):

NO

PHASE I ENVIRONMENTAL SITE ASSESSMENT
USER-FURNISHED INFORMATION

The following is a list of documents and information that are useful to SCS in preparing your Phase I Environmental Site Assessment. Check the appropriate boxes below, sign, and return this along with copies of any reasonably available documents or information. This will be attached to and made part of your completed Phase I Report.

Yes	No	
☐	☑	1. Environmental site assessment reports
☐	☑	2. Environmental audit reports
☐	☑	3. Environmental permits, i.e. solid waste disposal permits, hazardous waste disposal permits, wastewater permits, National Pollutant Discharge Elimination System (NPDES) permits
☐	☑	4. Registrations for underground and above-ground storage tanks
☐	☑	5. Material safety data sheets
☐	☑	6. Community right-to-know plan
☐	☑	7. Safety plans: preparedness and prevention plans; spill prevention, countermeasure, and control plans; etc.
N/A	☑	8. Reports regarding hydrogeologic conditions on the property or surrounding area
☐	☑	9. Notices or other correspondence from any government agency relating to past or existing environmental liens encumbering the property
☐	☑	10. Hazardous waste generator notices or reports
☑	☐	11. Geotechnical studies
☐	☑	12. Information concerning any pending, threatened, or past litigation or administrative proceedings relevant to hazardous substances or petroleum products
☐	☑	13. Notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products
☐	☑	14. Disclosure of sumps, pits, drainage systems (existence and location)
☐	☐	15. Building plans (architectural, utility, structural)
☐	☑	16. Description of current site operations, including layout drawings or sketches
☑	☐	17. Title report/chain of title
☐	☑	18. Tax assessor records (previous owner and occupants)
☐	☑	19. Purchase price analysis (if lower than comparable)
☐	☑	20. Current and historical photographs of site

I have reviewed the above list and have provided copies of documents and information that exists that could be obtained within reasonable time and cost constraints.

Keith Gregory
Signature

5/21/14
Date

REGULATORY RECORDS
FOR ADJACENT LUST CASE

Environmental Business Solutions

HE-17 Integrated Report

Date of Report: 06/13/2014

Estno:	120203	Ename:	7-ELEVEN FOOD STORE #16439	Ebldg:		Ezip:	92021
Estrno:	14110	Estr:	OLDE	Ecity:	EL CAJON	Ephone	619-443-5993
Edir:							

ActDesc:	Fuel-Dispense no repair	In:		Mp:		Epa:	CAD981406986	BP Acceptance DT:	
Contact:	BARRY FEELEY	Sic1:		Corp:		Gas:		Last Update:	5/10/2005
Iname:	MFITZMAU	Exp:		Ct:	155.0	Inp3:	02/10/04	Last Letter Type:	
Ntc:		St:		Rinp3:					

Violation(s):

120203	6HV3253	8/5/2002	6193	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	6HX3002	7/28/1998	1908	UST OWNR-OPR W/O HEALTH PERMIT
120203	6HX3014	7/28/1998	1909	QUANT RELEASE DETECTION INADEQUATE
120203	6HX3015	7/28/1998	1910	ANNUAL INTEGRITY TEST NOT DONE
120203	6HV1096	7/28/1998	1911	NO EMPLOYEE TRAINING RECORDS
120203	6HV1097	7/28/1998	1912	HMBP: NO EMPLOYEE TRAINING PROGRAM
120203	6HV0135	9/14/1999	4219	MANIFESTS/RECEIPTS FOR 3 YEARS NOT ONSIT
120203	6HX3004	9/14/1999	4220	NO SIR DATA TO LOCAL AGENCY
120203	6HV0135	3/1/2001	8496	MANIFESTS/RECEIPTS FOR 3 YEARS NOT ONSIT
120203	6HV1096	3/1/2001	8497	NO EMPLOYEE TRAINING RECORDS
120203	6HX0062	3/1/2001	8498	NO UST OWNER OPERATOR AGREEMENT
120203	6HX3001	3/1/2001	8499	UST RECORDS NOT MAINTAINED ONSITE

120203	6HX3003	3/1/2001	8500	MONITORING SYTEM NOT TESTED ANNUALLY
120203	6HV3115	2/14/2006	2975	NO 2NDARY CONTAINMT. TEST/REPAIRS
120203	6HV3253	8/5/2002	6192	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	01 GENERAL VIOLATION	3/1/2001	V004	UNDERGROUND STORAGE TANK MONITORING/MAINTENANCE/CALIBRATION RECORDS ARE NOT MAINTAINED ON SITE. HSC 25293; CCR 2712(B), 2641(I)
120203	6HV3253	8/5/2002	6194	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	6HV3302	8/5/2002	6195	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	8/5/2002	6196	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	8/5/2002	6197	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3112	3/27/2003	4532	2NDRY CONT TEST NOT DONE (6/36 MOS.)
120203	6HV3302	3/27/2003	4533	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	3/27/2003	4534	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	3/27/2003	4535	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3101	2/23/2005	4665	UPF PERMIT NOT CURRENT/ONSITE
120203	6HV3102	2/23/2005	4666	OPER. PERMIT NOT CURRENT/ONSITE
120203	6HV3105	2/23/2005	4667	NO CURRENT FINANCIAL RESPONSIBILITY

120203		2/23/2005	4668	NO 2NDARY CONTAINMT. TEST/REPAIRS
	6HV3115			
120203	01	5/19/1993	V001	PERSONNEL TRAINING RECORDS NOT AVAILABLE TO SHOW THAT PERSONNEL HAVE
	GENERAL VIOLATION			RECEIVED INITIAL AND ANNUAL REFRESHER TRAINING. CCR 2732(B)
120203		3/1/2001	8501	HMBP: NO EMPLOYEE TRAINING PROGRAM
	6HV1097			
120203	01	6/5/1996	V004	TANK OWNER HAS FAILED TO CONDUCT AN ANNUAL INTEGRITY TEST AS
	GENERAL VIOLATION			REQUIRED. HSC 25292, CCR 2643,2645
120203	01	5/19/1993	V002	DOCUMENTATION SHOWING EVIDENCE OF FINANCIAL RESPONSIBILITY IS NOT
	GENERAL VIOLATION			AVAILABLE. HSC 25292.2
120203	01	5/19/1993	V003	UNDERGROUND STORAGE TANK MONITORING/MAINTENANCE/CALIBRATION RECORDS
	GENERAL VIOLATION			ARE NOT MAINTAINED ON SITE. HSC 25293; CCR 2712(B), 2641(I)
120203	01	5/19/1993	V004	FAILED TO NOTIFY THE HMMD OF MONTHLY INVENTORY VARIATION EXCEEDING
	GENERAL VIOLATION			THE ALLOWABLE MONTHLY ERROR. CCR 2646(K)
120203	01	3/17/1995	V001	DOCUMENTATION SHOWING EVIDENCE OF FINANCIAL RESPONSIBILITY IS NOT
	GENERAL VIOLATION			AVAILABLE. HSC 25292.2
120203	01	3/17/1995	V002	UNDERGROUND STORAGE TANK MONITORING/MAINTENANCE/CALIBRATION RECORDS
	GENERAL VIOLATION			ARE NOT MAINTAINED ON SITE. HSC 25293; CCR 2712(B), 2641(I)
120203	01	3/17/1995	V003	TANK OWNER HAS FAILED TO CONDUCT AN ANNUAL INTEGRITY TEST AS
	GENERAL VIOLATION			REQUIRED. HSC 25292, CCR 2643,2645
120203	01	3/17/1995	V004	MONTHLY RECONCILIATION IS NOT BEING PERFORMED OR IS BEING PERFORMED
	GENERAL VIOLATION			IMPROPERLY. CCR 2646(I)
120203	01	3/17/1995	V005	OWNER/OPERATOR HAS NOT TESTED THE PRESSURIZED PRODUCT LINE LEAK
	GENERAL VIOLATION			DETECTION DEVICE ANNUALLY AS REQUIRED. HSC 25292(B) (4) (C)
120203	01	3/17/1995	V006	WRITTEN ROUTINE MONITORING PROCEDURE FOR THE UNDERGROUND STORAGE
	GENERAL VIOLATION			TANK SYSTEM HAS NOT BEEN PREPARED AND IMPLEMENTED. CCR2632(E)(1),2634(B)(2)
120203	01	3/17/1995	V007	SPILL CONTAINER/OVERFILL PREVENTION SYSTEM IS NOT PROPERLY INSTALLED OR
	GENERAL VIOLATION			MAINTAINED AS REQUIRED. CCR 2635(C)
120203	01	3/17/1995	V008	BUSINESS PLAN DOES NOT LIST THE NAME AND 24 HOUR PHONE NUMBERS OF
	GENERAL VIOLATION			EMERGENCY CONTACT PERSONS. HSC 25509(A)(7);CCR 2729(A)(6)

120203	01 GENERAL VIOLATION	3/17/1995	V009	BUSINESS PLAN DOES NOT INCLUDE AN ADEQUATE EMPLOYEE TRAINING PROGRAM WITH EMERGENCY NOTIFICATION,MITIGATION&EVACUATION PROCEDURES.HSC25504(C)
120203	01 GENERAL VIOLATION	6/5/1996	V001	BUSINESS PLAN WAS NOT AMENDED WITHIN 30 DAYS FOR A 100% QUANTITY IN-CREASE,NEW DISCLOSABLE MATERIALS OR A CHANGE IN BUSINESS INFO.HSC 25505
120203	02 GENERAL VIOLATION	3/1/2001	V006	BUSINESS PLAN DOES NOT INCLUDE AN ADEQUATE EMPLOYEE TRAINING PROGRAM WITH EMERGENCY NOTIFICATION,MITIGATION&EVACUATION PROCEDURES.HSC25504(C)
120203	01 GENERAL VIOLATION	7/28/1998	V004	PERSONNEL TRAINING RECORDS NOT AVAILABLE TO SHOW THAT PERSONNEL HAVE RECEIVED INITIAL AND ANNUAL REFRESHER TRAINING. CCR 2732(B)
120203	6HV3263	2/7/2007	0595	MONITOR SYSTEM NOT ALL FUNCTIONAL
120203	01 GENERAL VIOLATION	3/1/2001	V003	OPERATOR OF THE UNDERGROUND STORAGE TANK HAS NOT ENTERED INTO A WRITTEN CONTRACT WITH TANK OWNER AND NOTIFIED THE HMMD HSC 25293(B)
120203	02 GENERAL VIOLATION	3/1/2001	V002	PERSONNEL TRAINING RECORDS NOT AVAILABLE TO SHOW THAT PERSONNEL HAVE RECEIVED INITIAL AND ANNUAL REFRESHER TRAINING. CCR 2732(B)
120203	02 GENERAL VIOLATION	3/1/2001	V001	HAZARDOUS WASTE MANIFESTS/RECEIPTS ARE NOT MAINTAINED ON SITE TO DOCUMENT PROPER DISPOSAL OF HAZARDOUS WASTE CCR 66262.40, 66272.1
120203	01 GENERAL VIOLATION	9/14/1999	V002	OWNER/OPERATOR HAS NOT PROVIDED STATISTICAL INVENTORY RECONCILIATION CONTRACTOR OR THE LOCAL ENFORCEMENT AGENCY WITH ADEQUATE DATA RECORDS.
120203	01 GENERAL VIOLATION	6/5/1996	V002	OPERATOR OF THE UNDERGROUND STORAGE TANK HAS NOT ENTERED INTO A WRITTEN CONTRACT WITH TANK OWNER AND NOTIFIED THE HMMD HSC 25293(B)
120203	01 GENERAL VIOLATION	7/28/1998	V005	BUSINESS PLAN DOES NOT INCLUDE AN ADEQUATE EMPLOYEE TRAINING PROGRAM WITH EMERGENCY NOTIFICATION,MITIGATION&EVACUATION PROCEDURES.HSC25504(C)
120203	01 GENERAL VIOLATION	6/5/1996	V003	QUANTITATIVE RELEASE DETECTION METHOD (TANK/LINE TESTING, ATG, LINE LEAK DETECTORS, ETC.) DOES NOT MEET PERFORMANCE STANDARDS. CCR 2643
120203	01 GENERAL VIOLATION	7/28/1998	V003	TANK OWNER HAS FAILED TO CONDUCT AN ANNUAL INTEGRITY TEST AS REQUIRED. HSC 25292, CCR 2643,2645
120203	01 GENERAL VIOLATION	7/28/1998	V002	QUANTITATIVE RELEASE DETECTION METHOD (TANK/LINE TESTING, ATG, LINE LEAK DETECTORS, ETC.) DOES NOT MEET PERFORMANCE STANDARDS. CCR 2643

120203	01 GENERAL	7/28/1998	V001 VIOLATION	TANK OWNER HAS NOT OBTAINED A VALID SAN DIEGO COUNTY UNDERGROUND STORAGE TANK PERMIT. HSC 25284, SDCC 68.1105
120203	01 GENERAL	9/23/1997	V001 VIOLATION	OWNER/OPERATOR HAS NOT PROVIDED STATISTICAL INVENTORY RECONCILIATION CONTRACTOR OR THE LOCAL ENFORCEMENT AGENCY WITH ADEQUATE DATA RECORDS.
120203	01 GENERAL	6/5/1996	V005 VIOLATION	OWNER/OPERATOR HAS NOT TESTED THE PRESSURIZED PRODUCT LINE LEAK DETECTION DEVICE ANNUALLY AS REQUIRED. HSC 25292(B) (4) (C)
120203	01 GENERAL	3/1/2001	V005 VIOLATION	OWNER/OPERATOR HAS NOT HAD MONITORING EQUIPMENT TESTED ANNUALLY AS REQUIRED. 23CCR 2630, 2641 (J)
120203	01 GENERAL	9/14/1999	V001 VIOLATION	HAZARDOUS WASTE MANIFESTS/RECEIPTS ARE NOT MAINTAINED ON SITE TO DOCUMENT PROPER DISPOSAL OF HAZARDOUS WASTE CCR 66262.40, 66272.1
120203	6HV3302	8/5/2002	9069	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV1097	7/28/1998	4603	HMBP: NO EMPLOYEE TRAINING PROGRAM
120203	6HV0135	9/14/1999	6940	MANIFESTS/RECEIPTS NO ONSITE
120203	6HX3004	9/14/1999	6941	NO SIR DATA TO LOCAL AGENCY
120203	6HV0135	3/1/2001	1226	MANIFESTS/RECEIPTS NO ONSITE
120203	6HV1096	3/1/2001	1227	NO EMPLOYEE TRAINING RECORDS
120203	6HX0062	3/1/2001	1228	NO UST OWNER OPERATOR AGREEMENT
120203	6HX3001	3/1/2001	1229	UST RECORDS NOT MAINTAINED ONSITE
120203	6HX3003	3/1/2001	1230	MONITORING SYTEM NOT TESTED ANNUALLY
120203	6HV1097	3/1/2001	1231	HMBP: NO EMPLOYEE TRAINING PROGRAM

120203	6HV3253	8/5/2002	9064	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	6HV3253	8/5/2002	9065	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	6HV3253	8/5/2002	9066	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	6HV0401	2/23/2005	4669	TRAINING RECORDS UNAVAILABLE
120203	6HV3302	8/5/2002	9068	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HX3014	7/28/1998	4600	QUANT RELEASE DETECTION INADEQUATE
120203	6HV3112	3/27/2003	7444	2NDRY CONT TEST NOT DONE (6/36 MOS.)
120203	6HV3302	3/27/2003	7445	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	3/27/2003	7446	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	3/27/2003	7447	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3101	2/23/2005	7650	UPF PERMIT NOT CURRENT/ONSITE
120203	6HV3102	2/23/2005	7651	OPER. PERMIT NOT CURRENT/ONSITE
120203	6HV3105	2/23/2005	7652	NO CURRENT FINANCIAL RESPONSIBILITY
120203	6HV3115	2/23/2005	7653	NO 2NDARY CONTAINMT. TEST/REPAIRS
120203	6HV0401	2/23/2005	7654	TRAINING RECORDS UNAVAILABLE
120203	6HV3115	2/14/2006	6158	NO 2NDARY CONTAINMT. TEST/REPAIRS

120203	6HV3263	2/7/2007	3786	MONITOR SYSTEM NOT ALL FUNCTIONAL
120203	6HV3115	1/28/2008	1275	NO 2NDARY CONTAINMT. TEST/REPAIRS
120203	6HV3255	1/28/2008	1276	SPILL CONTAIN. NOT DRY/IN GOOD CONDITION
120203	6HV3302	8/5/2002	9067	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HX3003	3/1/2001	2573	MONITORING SYTEM NOT TESTED ANNUALLY
120203	6HV3115	1/28/2008	8239	NO 2NDARY CONTAINMT. TEST/REPAIRS
120203	6HV3255	1/28/2008	8240	SPILL CONTAIN. NOT DRY/IN GOOD CONDITION
120203	6HV3411	1/28/2008	8241	LLD NOT INSTALLED/NOT FUNCTIONAL
120203	6HV3263	1/14/2010	2465	MONITOR SYSTEM NOT ALL FUNCTIONAL
120203	6HX3002	7/28/1998	5984	UST OWNR-OPR W/O HEALTH PERMIT
120203	6HX3014	7/28/1998	5985	QUANT RELEASE DETECTION INADEQUATE
120203	6HX3015	7/28/1998	5986	ANNUAL INTEGRITY TEST NOT DONE
120203	6HV1096	7/28/1998	5987	NO EMPLOYEE TRAINING RECORDS
120203	6HV1097	7/28/1998	5988	HMBP: NO EMPLOYEE TRAINING PROGRAM
120203	6HV0135	9/14/1999	8348	MANIFESTS/RECEIPTS NO ONSITE
120203	6HX3004	9/14/1999	8349	NO SIR DATA TO LOCAL AGENCY

120203	6HV0135	3/1/2001	2569	MANIFESTS/RECEIPTS NO ONSITE
120203	6HV1096	3/1/2001	2570	NO EMPLOYEE TRAINING RECORDS
120203	6HV1096	7/28/1998	4602	NO EMPLOYEE TRAINING RECORDS
120203	6HV3302	8/5/2002	0413	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3411	1/28/2008	1277	LLD NOT INSTALLED/NOT FUNCTIONAL
120203	6HX3002	7/28/1998	4599	UST OWNR-OPR W/O HEALTH PERMIT
120203	6HV3302	3/27/2003	8761	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	3/27/2003	8760	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3302	3/27/2003	8759	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HX0062	3/1/2001	2571	NO UST OWNER OPERATOR AGREEMENT
120203	6HV3302	8/5/2002	0414	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HX3001	3/1/2001	2572	UST RECORDS NOT MAINTAINED ONSITE
120203	6HV3302	8/5/2002	0412	IMPRESSED CURRENT TEST NOT DONE ON TIME
120203	6HV3253	8/5/2002	0411	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	6HV3253	8/5/2002	0410	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.
120203	6HV3253	8/5/2002	0409	STICKER/TAG NOT AFFIXED TO MONIT. EQUIP.

120203	6HV1097	3/1/2001	2574	HMBP: NO EMPLOYEE TRAINING PROGRAM
120203	6HX3015	7/28/1998	4601	ANNUAL INTEGRITY TEST NOT DONE
120203	6HV3112	3/27/2003	8758	2NDRY CONT TEST NOT DONE (6/36 MOS.)

Waste:

352	1/14/2010	ORGANIC SOLIDS (OTHE 2997 BELSHIRE ENVIRONMENT	10 LBS 30	352	METAL DRUM 001 RECYCLE
134	1/14/2010	AQUEOUS SOL'N W/LESS 2997 BELSHIRE ENVIRONMENT	55 GAL 1300	134	METAL DRUM 001 RECYCLE
352	1/28/2008	ORGANIC SOLIDS (OTHE 2997 BELSHIRE ENVIRONMENT		352	METAL DRUM 001 RECYCLE
134	1/28/2008	AQUEOUS SOL'N W/LESS 2997 BELSHIRE ENVIRONMENT		134	METAL DRUM 001 RECYCLE
W001	3/1/2001	ORGANIC SOLIDS (OTHER) PACIFIC TREATMENT ENVIRON	10 LBS 30	352	METAL DRUMS 0-5 GALLONS RECYCLE
W001	9/14/1999	ORGANIC SOLIDS (OTHER) PACIFIC TREATMENT ENVIRON	10 LBS 30	352	METAL DRUMS 0-5 GALLONS RECYCLE

Disclosures:

SU87	120203	8006-61-9	FIRE	SUPER UNLEADED
REG	120203	8006-61-9	FIRE ACUTE	REGULAR UNLEADED UNDERGROUND TANK 120203 T004
RE85	120203	8006-61-9	FIRE	REGULAR UNLEADED
RE70	120203	8006-61-9	FIRE ACUTE	REGULAR UNLEADED UNDERGROUND TANK 120203 T004

RE10	120203	8006-61-9	FIRE ACUTE	REGULAR UNLEADED UNDERGROUND TANK 120203 T004
PRE	120203	8006-61-9	FIRE ACUTE	PREMIUM UNLEADED UNDERGROUND TANK 120203 T005
PR71	120203	8006-61-9	FIRE ACUTE	PREMIUM UNLEADED UNDERGROUND TANK 120203 T005
PR11	120203	8006-61-9	FIRE ACUTE	PREMIUM UNLEADED UNDERGROUND TANK 120203 T005
PL86	120203	8006-61-9	FIRE	PLUS UNLEADED

SAM Releases:

001	SOUTHLAND (UNKNOWN SOURC	COMPLAINT / Other	DEH	11/1/1984	CLOSED	3/7/1985
002	7-ELEVEN FOOD STORE #16439	TANK, Failed Test	DEH	7/30/1987	CLOSED	9/15/1987
003	7-ELEVEN FOOD STORE #16439	TANK, Failed Test	DEH	6/1/1988	CLOSED	6/16/1988
004	SOUTHLAND - OLD HY 80 EL CAJO	TANK, Release (W)	DEH	7/27/1993	OPEN	6/15/1999

Tanks:

T001	RT1383/NT	10000	REGULAR UNLEADED REMOVED	SPILL BA	SINGLE WALL AUTO SHUTOFF & BALL FLOAT VEEDER ROOT
T002	RT1383/NT	9940	MIDGRADE UNLEADED REMOVED	SPILL BA	SINGLE WALL AUTO SHUTOFF & BALL FLOAT VEEDER ROOT

HE-17 Integrated Report

Date of Report: 06/13/2014

T003	RT1383/NT	6000	PREMIUM UNLEADED REMOVED	SPILL BA	SINGLE WALL AUTO SHUTOFF & BALL FLOAT VEEDER ROOT
T004	NT2379(PO	10000	REGULAR UNLEADED ACTIVE	AUTO S	DOUBLE WALL SHUTOFF & SPILL BASIN VEERDER ROOT
T005	NT2379(PO	10000	PREMIUM UNLEADED ACTIVE	SPILL BA	DOUBLE WALL AUTO SHUTOFF & HLA VEERDER ROOT

JACK MILLER
Director

County of San Diego

DEPARTMENT OF ENVIRONMENTAL HEALTH
P.O. BOX 129261, SAN DIEGO, CA 92112-9261
Phone: (858) 505-6700/1 (800) 253-9933
www.sdcdeh.org

ELIZABETH POZZEBON
Assistant Director

January 10, 2014

Mr. Jose Rios
7-Eleven, Inc.
P.O. Box 711
Dallas, TX 75221-0711

Brunetto Family Trust 12-27-90
1875 Lisa Terrace
El Cajon, CA 92021

McKinley Investments L P
12837 Camino Ramillette
San Diego, CA 92128

Admiral Guest Trust Bank
P.O. Box #A375
San Diego, CA 92112

Dear Responsible Parties:

UNDERGROUND STORAGE TANK (UST) CASE #H20203-004
7-ELEVEN LOCATION NO. 16439
14110 OLDE HIGHWAY 80, EL CAJON, CA 92021

This letter confirms the completion of a site investigation and corrective action for the underground storage tanks formerly located at the above-described location. Thank you for your cooperation throughout this investigation. Your willingness and promptness in responding to our inquiries concerning the former underground storage tanks is greatly appreciated.

Based on information in the above-referenced file and with the provision that the information provided to this agency was accurate and representative of site conditions, this agency finds that the site investigation and corrective action carried out at your underground storage tanks site is in compliance with the requirements of subdivisions (a) and (b) of Section 25296.10 of the Health and Safety Code and with corrective action regulations adopted pursuant to Section 25299.3 of the Health and Safety Code, and that no further action related to the petroleum release at the site is required.

Claims for reimbursement of corrective action costs submitted to the Underground Storage Tank Cleanup Fund more than 365 days after the date of this letter or issuance or activation of the Fund's Letter of Commitment, whichever occurs later, will not be reimbursed unless one of the following exceptions applies:

- Claims are submitted pursuant to Section 25299.57, subdivision (k) (reopened UST case); or
- Submission within the timeframe was beyond the claimant's reasonable control, ongoing work is required for closure that will result in the submission of claims beyond that time period, or that under the circumstances of the case, it would be unreasonable or inequitable to impose the 365-day time period.

This notice is issued pursuant to subdivision (g) of Section 25296.10 of the Health and Safety Code. Please contact Craig Burnett, at (858) 505-6978, if you have questions regarding this matter.

Sincerely,

JACK MILLER, Director
Department of Environmental Health
Site Assessment and Mitigation Program

Enclosure

cc: Mr. Pat McConnell, Stantec Consulting Services, Inc.

Case Closure Summary
Leaking Underground Fuel Storage Tank Program

I. AGENCY INFORMATION

DATE: 1/10/2014

Agency Name: County of San Diego, Environmental Health, SAM	Address: P.O. Box 129261
City/State/Zip: San Diego, CA 92112-9261	Phone: (858) 505-6700 FAX: (858) 505-6891
Responsible Staff Person: Craig Burnett	Title: Environmental Health Specialist II

II. CASE INFORMATION

Site Facility Name: 7-Eleven # 16439

Site Facility Address: 14110 Olde Highway 80, El Cajon, CA 92021

RB LUSTIS Case No: 9UT2534	Local Case No: H20203-004	LOP Case No: N/A
URF Filing Date: 10/13/1993	SWEEPS No: N/A	

Responsible Parties	Address	Phone Number
Mr. Jose Rios, 7-Eleven Inc.	P.O. Box 711, Dallas, TX 75221-0711	(972) 828-6592
Brunetto Family Trust 12-27-90	1875 Lisa Terrace, El Cajon, CA 92021	
McKinley Investments L P	12837 Camino Ramillette, San Diego, CA 92128	
Admiral Guest Trust Bank	P.O. Box #A375, San Diego, CA 92112	

Tank No.	Size in Gal.	Contents	Status	Date
T001	10,000 Gallons	Regular Unleaded	Closed By Removal	1/12/2004
T002	10,000 Gallons	Midgrade Unleaded	Closed By Removal	1/12/2004
T003	6,000 Gallons	Premium Unleaded	Closed By Removal	1/12/2004
T004	10,000 Gallons	Regular Unleaded	Current	Installed 1/23/2004
T005	10,000 Gallons	Premium Unleaded	Current	Installed 1/23/2004

III. RELEASE AND SITE CHARACTERIZATION INFORMATION

Cause of Release: Substance released from UST system.	Substance Released: Gasoline	
Site Characterization complete Yes	Date Approved By Oversight Agency: 2/1/2000	
Monitoring Wells Installed Yes	Number: 20	Proper Screened Interval? Yes*
Highest GW Depth B.G. Surface: 3.62 feet	Lowest Depth: 15.00 feet	Flow Direction: Southwest, 0.06 ft/ft

Most Sensitive Current Use: Beneficial Groundwater Use: Municipal, Agricultural, and Industrial Process and Service Supply
Existing Beneficial Surface Water Use: Agricultural, Industrial Service and Process Supply, Non-Water Contact Recreation, Water Contact Recreation, Cold Water, Warm Water and Wildlife Habitat.

Are Drinking Water Wells Affected? No	Aquifer Name: 907.14 - (Coches Hydrologic Subarea)
Is Surface Water Affected? No	Nearest SW name: Hansen Reservoir, approximately 4,000 feet southwest
Off-Site Beneficial Use Impacts None	
Report(s) on file Yes	Where are Reports Filed? County of San Diego, Department of Environmental Health

TREATMENT AND DISPOSAL OF AFFECTED MATERIAL

Material	Amount (Include Units)	Action (Treatment or Disposal)	Date
Tank(s)	3 Tanks	Recycled, American Metal Recycling, Inc., Ontario, CA	1/12/2004
Soil	18 Cubic Yards	Treatment Off Site, Soil Wash, San Diego, CA	12/9/1997
Soil	533 Cubic Yards	Treatment Off Site, TPS Technologies, San Diego, CA	1/13/2004 - 1/19/2004
Water	2,400 Gallons	Treatment Off Site, Demenno Kerdoon, Compton, CA	1/13/2004 - 2/2/2004
Vapor	2,394 Pounds	Treatment On Site	2/15/2000 – 11/11/2004
Purge Water	Unknown	Managed in Accordance with 40 CFR and Title 22	12/26/1993 – 5/29/2012

Case Closure Summary
Leaking Underground Fuel Storage Tank Program

III. RELEASE AND SITE CHARACTERIZATION INFORMATION (Continued) **H20203-004**

MAXIMUM DOCUMENTED CONTAMINANT CONCENTRATIONS

	MAXIMUM	REMAINING
SOIL		
Gasoline	= 8,400 mg/kg	= 1,300 mg/kg
Diesel	< 10 mg/kg	< 10 mg/kg
Benzene	= 75.08 mg/kg	= 0.2 mg/kg
Toluene	= 420.40 mg/kg	= 0.3 mg/kg
Ethyl benzene	= 83.33 mg/kg	= 8.6 mg/kg
Xylene (individual isomers or total)	= 566.56 mg/kg	= 18 mg/kg
Methyl-tert-butyl ether (MTBE)	= 3.8 mg/kg	= 0.12 mg/kg
tert-Butyl Alcohol (TBA)	= 0.356 mg/kg	< 0.005 mg/kg
tert-Amyl-methyl ether (TAME)	< 0.01 mg/kg	< 0.005 mg/kg
Ethyl-tert-butyl ether (ETBE)	< 0.01 mg/kg	< 0.005 mg/kg
di-isopropyl ether (DIPE)	< 0.01 mg/kg	< 0.005 mg/kg
WATER		
Gasoline	= 210,000 ug/l	= 1,800 ug/l
Benzene	= 20,000 ug/l	= 3.1 ug/l
Toluene	= 53,000 ug/l	= 0.86 ug/l
Ethyl benzene	= 4,700 ug/l	= 1.0 ug/l
Xylene (individual isomers or total)	= 27,000 ug/l	= 1.9 ug/l
Methyl-tert-butyl ether (MTBE)	= 20,000 ug/l	= 13 ug/l
tert-Butyl Alcohol (TBA)	= 930 ug/l	= 9.0 ug/l
tert-Amyl-methyl ether (TAME)	= 1.3 ug/l	< 0.50 ug/l
Ethyl-tert-butyl ether (ETBE)	< 30 ug/l	< 0.50 ug/l
di-isopropyl ether (DIPE)	< 30 ug/l	< 0.50 ug/l
LIQUID PHASE HYDROCARBONS	0.02 feet	0 feet

Comments:

7-Eleven Store # 16439 (Site), located at the northeast corner of Olde Highway 80 and Lake Jennings Park Road, is an operating gas station located in a commercial shopping center. The site is bounded by Olde Highway 80 and residential property towards the south, commercial business towards the east, Lake Jennings Park Road towards the west, and Interstate 8 towards the north.

On July 27, 1993, soil sampling was conducted during upgrades to the Underground Storage Tank (UST) system at the site. Laboratory results from this initial investigation indicated Total Petroleum Hydrocarbons as gasoline (TPHg) ranging from below laboratory reporting limit (ND) to 8,400 milligrams per kilogram (mg/kg). Based on the results, Unauthorized Release case H20203-004 was opened. Approximately 27 tons (approximately 18 cubic yards) of hydrocarbon impacted soil were removed during UST system upgrades.

From 1993 to 1998, additional site assessment investigations were conducted to delineate the extent of hydrocarbons in soil and groundwater. These investigations included the installation of twelve groundwater monitoring and sampling wells. Results from soil sampling indicated TPHg concentrations ranging from ND to 5,057 mg/kg. Benzene concentrations in soil ranged from ND to 75.08 mg/kg. Concentrations of benzene and Methyl Tertiary Butyl Ether (MTBE) in groundwater ranged from ND to 20,000 µg/L. Dissolved-phase impacts to groundwater extended southwest approximately 250 feet offsite.

The site is located in a basin designated for beneficial municipal, agricultural, and industrial process and service supply uses. Groundwater flow direction is towards the southwest. Groundwater monitoring wells installed onsite and offsite have shown that groundwater has been impacted by the unauthorized release. Quarterly groundwater monitoring and sampling was conducted at the site from December 1993 through December 2009 and Semi-annually from January 2010 through May 2012.

In October 1998, three Air Sparge/Soil Vapor Extraction (AS/SVE) wells were installed. AS/SVE feasibility testing was conducted in December 1998 to obtain a long term cleanup solution. Based on the results, AS/SVE appeared to be an effective remedial alternative and was presented as the chosen remedial alternative in the Corrective Action Plan. In October 1999, an additional five AS/SVE wells were installed. Remedial efforts were conducted from February 2000 through November 2004 and then shut down to evaluate rebound conditions. The system was not restarted following the evaluation. The consultant estimates the AS/SVE system successfully removed approximately 2,394 pounds of hydrocarbons from the site. The consultant estimates approximately 237 cubic yards of hydrocarbon impacted soil greater than 100 mg/kg remain offsite. Remedial actions have reduced hydrocarbon concentrations in groundwater near or below Maximum Concentration Limits.

A receptor search was conducted within ½ mile radius of the site. Based on soil and groundwater concentrations, the consultant concludes there were no potential receptors. The consultant concludes that the remedial alternative has been effective in removing hydrocarbon impacts in soil and groundwater. The consultant recommends no further action for this unauthorized release. DEH concurs with this recommendation.

Case Closure Summary
Leaking Underground Fuel Storage Tank Program

IV. CLOSURE

H20203-004

Does completed corrective action protect existing beneficial uses per the Regional Board Basin Plan? No, MTBE and benzene are at or slightly above MCLs.
Does completed corrective action protect potential beneficial uses per the Regional Board Basin Plan? No, MTBE and benzene are at or slightly above MCLs.
Does corrective action protect public health for current land use? Yes Case oversight completed based upon the following site use: Commercial
Site Management Requirements: Any Contaminated Soil Excavated As Part Of Subsurface Construction Work Must Be Managed In Accordance With The Legal Requirements At That Time.
Should corrective action be reviewed if land use changes? Yes

Monitoring Wells Decommissioned: Yes	Number Decommissioned: 2	Number Retained: 18**
List Actions Taken: Notice Of Reimbursement/Local None		
List Enforcement Actions Rescinded: None		

V. LOCAL AGENCY REPRESENTATIVE DATA

Name: Kevin M. Heaton, PG 4163, CHg 163	Title: Senior Hydrogeologist
Signature: Kevin Heaton 2014.01.10 11:05:21 -08'00'	Date: 1/10/2014

VI. RWQCB NOTIFICATION

Date Submitted to RB: 11/13/2013	RB Response: No Response	
RWQCB Staff Name: Craig Carlisle	Title: Senior Engineering Geologist	Date: 12/13/2013

VII. ADDITIONAL COMMENTS, DATA, ETC

* Monitoring Well MW-1 improperly sceened well (submerged screen).

**A permit for the destruction of the monitoring wells was issued on 12/24/2013. The permit number is DEH2013-LMWP-000799.

This document and the related CASE CLOSURE LETTER, shall be retained by the lead agency as part of the official site file.

SECOR

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September 27, 2005

08EL.16439.05.0537

Mr. James Clay
County of San Diego, LWQD
P.O. Box 129261
San Diego, CA 92112-9261

Subject: **Justification for Remediation System Shut-Down**
7-Eleven Location No. 16439
14110 Old Highway 80
El Cajon, California 92021
Unauthorized Release No.: H20203-004

Dear Mr. Clay:

On behalf of 7-Eleven, Inc. (7-Eleven), SECOR International Incorporated (SECOR) has prepared this letter to provide justification for remediation system shut down at the subject site (Figure 1). This letter summarizes the assessment and remediation work performed to date at the site and compares the maximum and current groundwater conditions at the site to clean up goals provided in the Addendum to the Corrective Action Plan (CAP) dated October 11, 1999. This letter has been prepared in response to a request from the County of San Diego, Land and Water Quality Division (LWQD) dated July 26, 2005.

BACKGROUND

Previous Assessment

In July 1993, the gasoline product lines were excavated and replaced from the pump island to the underground storage tanks (USTs). In December 1993, Kleinfelder, Inc. installed three soil borings and groundwater monitoring well MW-1 (Figure 2). In August 1996, SECOR conducted a passive soil gas survey at the site. Based on the results of the survey, five groundwater monitoring wells (MW-2 through MW-6) were installed. In 1997 and 1998, SECOR installed six additional monitoring wells (MW-7 through MW-12).

In 1999, SECOR designed and installed a soil and groundwater remediation system. A combined air sparging/soil vapor extraction (AS/SVE) system began operating on February 15, 2000. The original SVE system consisted of a combined thermal and catalytic oxidizer unit (located north of the existing 7-Eleven store building) manifolded to eight soil vapor extraction wells (VE-1, VE-2, VE-3, VE-4, VE-5, VE-6, VE-7, and VE-8). The AS system consists of a 10-horsepower air compressor, capable of supplying up to 35 standard cubic feet per minute (scfm) of filtered atmospheric air at a regulated pressure, manifolded to eight air sparge wells (AS-1, AS-2, AS-3, AS-4, AS-5, AS-6, AS-7, and AS-8). A site plan illustrating the layout of the AS/SVE system is presented as Figure 2.

The SVE system began operation in catalytic destruction mode and operated intermittently to the end of August 2001. On August 29, 2001, the SVE system was shut down pending conversion to a carbon system. On November 15, 2001, the SVE system was dismantled and transported to another 7-Eleven site. In June 2003, a blower and carbon canisters were installed on site to allow air sparge and soil vapor extraction system operations

to resume. The SVE system started operating in carbon adsorption mode on July 3, 2003, and the AS system began operating on September 5, 2003. The AS/VE system removed and treated approximately 2,394 pounds of hydrocarbons during system operation. Due to equipment theft, the AS/VE system has been off-line since October 28, 2004. Soil vapor extraction system sample analytical results are summarized in Table 1.

In January 2004, SECOR observed the removal of one 6,000-gallon and two 10,000-gallon steel USTs at the site. Total petroleum hydrocarbons as gasoline (TPHg) concentrations of 8.0 milligrams per kilogram (mg/kg), 9.0 mg/kg and 24 mg/kg were detected in three of nine soil samples. Total petroleum hydrocarbons as diesel (TPHd) concentrations ranging from 1.0 mg/kg to 144 mg/kg were detected in six soil samples. Benzene was detected in one of nine soil samples at a concentration of 0.0031 mg/kg. Methyl-t-butyl ether (MTBE) was detected in four soil samples at concentrations ranging from 0.0015 mg/kg to 0.0049 mg/kg. Following the completion of soil sampling, two new double-walled fiberglass USTs were installed.

In March 2004, SECOR submitted a work plan to the LWQD for air sparge system installation to address persistent MTBE concentrations in groundwater in off-site wells MW-8 and MW-9. Following a series of discussions with Caltrans regarding encroachment permits for system installation, the Caltrans permit was approved in May 2005. MTBE concentrations in off-site wells MW-8 and MW-9 have declined and the off-site air sparge system installation has been put on hold pending LWQD review.

On-Site Groundwater Conditions

Historical groundwater analytical results are summarized in Table 2. Maximum and current on-site groundwater concentrations are summarized in Table 3. Hydrographs are presented in Attachment A.

Quarterly groundwater monitoring has been conducted at the site since November 1996. The maximum TPHg and MTBE concentrations in groundwater were 210,000 micrograms per liter (µg/L) and 20,000 µg/L, respectively, in well MW-7 (May 1998). The maximum benzene, toluene, ethylbenzene and xylene (BTEX) concentrations in groundwater were 20,000 µg/L, 53,000 µg/L, 4,700 µg/L, and 27,000 µg/L, respectively, in well MW-7 (May 1998).

In October 1999, SECOR submitted a CAP with the following clean-up goals for groundwater:

Benzene – 1 µg/L
Toluene – 150 µg/L
Ethylbenzene – 700 µg/L
Total Xylenes – 1,750 µg/L
MTBE – 5 µg/L

Benzene concentrations in MW-2 and MW-3 have been below CAP clean-up goals and Maximum Contaminant Levels (MCLs) since November 2000. Benzene concentrations in MW-7 have been below CAP clean-up goals and MCLs since December 2003. Benzene concentrations in MW-4 were below CAP clean up goals and MCLs from 1996 to February 2005. Benzene concentrations were detected in well MW-4 for the first time in January 2005.

Toluene, ethylbenzene and total xylenes concentrations have been below MCLs and CAP clean-up goals in MW-2, MW-3, and MW-4 from 1996 to 2005. Toluene, ethylbenzene and total xylenes concentrations have been below MCLs and CAP clean-up goals in MW-7 since November 2000.

MTBE concentrations in MW-2 and MW-3 have been below MCLs and CAP clean-up goals since February and December 2002, respectively. MTBE concentrations in MW-4 have been below MCLs and CAP clean-up goals since November 1999. From December 2003 to July 2005, MTBE concentrations have ranged from 13 to 72 µg/L in well MW-7.

Off-Site Groundwater Conditions

Historical groundwater analytical results are summarized in Table 2. Maximum and current on-site groundwater concentrations are summarized in Table 4. Hydrographs are presented in Attachment A.

In the off-site wells, the maximum TPHg concentration was 5,100 µg/L in well MW-8 (September 1997). Maximum BTEX concentrations in groundwater were 72 µg/L, 19 µg/L, 800 µg/L, and 420 µg/L, respectively, in well MW-8 (September 1997 and April 2000). The maximum MTBE concentration of 1,200 µg/L was detected in wells MW-9 (January 2001) and MW-11 (August 2000).

Benzene concentrations have been below CAP clean-up goals and MCLs in MW-5 (1996 to 2005), MW-6 (1996 to 2005), MW-8 (2001 to 2005), MW-9 (April 2003 to July 2005), MW-10 (1998 to 2005) and MW-11 (1998 to 2005).

Toluene, ethylbenzene and total xylenes concentrations have remained below MCLs and CAP clean-up goals in MW-5 and MW-6 (1996 to 2005), MW-8 and MW-9 (1997 to 2005), and MW-10 through MW-12 (May 1998 through 2005).

MTBE concentrations have been below MCLs and CAP clean-up goals in MW-5 and MW-6 since June 1997 and from 1996 to 2005, respectively. MTBE concentrations in MW-8 have ranged from 62 to 196 µg/L from February 2004 to July 2005. MTBE concentrations have been less than 100 µg/L for the last four quarters. MTBE concentrations in MW-9 have been less than 100 µg/L from February 2004 to July 2005. In wells MW-10 and MW-11, MTBE concentrations have been below MCLs and CAP clean-up goals from 1998 to 2005, and from May 2002 to 2005, respectively. In MW-12, MTBE concentrations have ranged from 2.7 to 13 µg/L in the last four quarters, and were less than MCLs and CAP clean-up goals for the four quarters prior to Fourth Quarter 2004.

Estimated Time for Off-Site MTBE Concentrations to Reach MCLs

This section provides an estimate of the time required for groundwater concentrations below the site to reach State of California primary drinking water MCLs. There are currently two off-site monitoring wells (MW-8 and MW-9) that consistently have MTBE concentrations above the primary MCL of 5.0 µg/L (Table 2). Hydrographs are presented in Attachment A.

The attenuation of dissolved hydrocarbon concentrations at fuel hydrocarbon sites generally follows a first-order decay trend once the majority of hydrocarbon source material has been

removed. The following equation has been used to describe the observed concentration decrease at a point (e.g. monitoring well) within a dissolved hydrocarbon plume:

$$C = C_o e^{-kt}$$

Where:
C = concentration at time t (μg/L)
C_o = initial peak concentration (μg/L)
k = overall attenuation rate constant (days^{-1})
t = elapsed time after observation of peak concentration (days)

To estimate the time for MTBE in wells MW-8 and MW-9 to attenuate to MCLs, SECOR used concentration trends in these wells to estimate first-order attenuation rate constants for MTBE. The resulting rate constants were then used to extrapolate the estimated time to reach MCLs at the site.

The highest reported MTBE concentrations in well MW-8 were 910 μg/L and 950 μg/L in February 2002 and August 2003, respectively. For well MW-8, a data set beginning with the MTBE concentration of 910 μg/L (2002) through the most recent data point, 62 μg/L (July 2005) was used for analysis. For well MW-9, a data set beginning with the maximum observed MTBE concentration of 1,200 μg/L (2001) through the most recent data point, 35 μg/L (July 2005) was used for analysis. Semi-log plots of MTBE concentrations versus time for wells MW-8 and MW-9 are presented as Figures 3 and 4, respectively.

A least-squares statistical method was used to calculate the best-fit trendline through each data set. The best-fit trendline and equation are included on Figures 3 and 4. The slope of the best-fit line is the estimated first-order attenuation rate constant for each data set. Based on the trend-line analyses, MTBE concentrations in the vicinity of wells MW-8 and MW-9 will reach 5.0 μg/L (MCL) in approximately 2 to 4 years. The trend analysis is summarized in Table 5.

Based on a review of the site data and experience at similar sites, it is estimated that MTBE concentrations in MW-8 and MW-9 will reach MCLs in 5 to 10 years. This estimate allows for a reasonable amount of uncertainty due to the possible presence of small pockets of residual hydrocarbons below the site that could result in future short-term concentration spikes.

Conclusions

Based on the current BTEX and MTBE concentrations in on-site wells MW-2, MW-3, MW-4, and MW-7 and off-site wells MW-5 and MW-6, groundwater beneath the site has reached CAP clean up goals except for the MTBE concentrations present in well MW-7. Based on the non-operational status of the AS/SVE system and the declining trends in groundwater concentrations, SECOR recommends that the on-site AS/VE system be shut down permanently.

MTBE concentrations have been less than 100 µg/L in off-site wells MW-8 and MW-9 for a minimum of four consecutive quarters. Based on the trend-line analyses, MTBE concentrations in the vicinity of wells MW-8 and MW-9 will reach 5.0 μg/L (MCL) in approximately 2 to 4 years. Based on the decreasing MTBE concentration trends, SECOR recommends that the proposed off-site AS treatment system not be installed, and that these concentrations be allowed to degrade naturally.

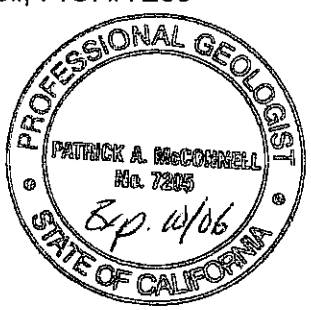
Should you have any questions or require any additional information please contact the undersigned at (619) 296-6195.

Respectfully,

SECOR International Incorporated

Arthur E. Gunter
Staff Geologist

Patrick A. McConnell, P.G. #7205
Senior Geologist



Enclosures:

Table 1 - Soil Vapor Extraction System Sample Analytical Results
Table 2 - Summary of Groundwater Quality and Elevation Data
Table 3 - Maximum and Current On-Site Groundwater Concentrations
Table 4 - Maximum and Current Off-Site Groundwater Concentrations
Table 5 - Concentration Trend Analysis Summary
Figure 1 - Site Location Map
Figure 2 - Site Plan with Remediation System Layout
Figure 3 – MTBE Concentration Trend Evaluation MW-8
Figure 4 – MTBE Concentration Trend Evaluation MW-9
Attachment A – Hydrographs

cc: Ken Hilliard, 7-Eleven, Inc.
John Wainwright, SECOR

TABLE 1
SOIL VAPOR EXTRACTION SYSTEM SAMPLE ANALYTICAL RESULTS
7-Eleven Location No. 16439
All concentrations in parts per million by volume (ppmv).

Vapor Sample Identification	Sampling Date	Total Volatile Hydrocarbons	Benzene	Toluene	Ethylbenzene	Total Xylenes	MTBE
Influent (No Dilution)	02/17/00	8,100	170	230	37	160	<5.0
Process (With Dilution)		1,100	18	43	4.700	21	<0.5
Effluent		2.9	0.021	0.025	0.003	0.016	0.004
Influent (No Dilution)	03/02/00	6,400	96	370	27	100	66
Process (With Dilution)		650	6.0	44	12	60	<0.5
Effluent		<0.1	<0.001	<0.001	<0.001	<0.001	0.013
Influent (No Dilution)	04/03/00	1,300	11	60	14	120	15.000
Process (With Dilution)		50	0.400	2.500	0.440	3.600	0.740
Effluent		2.4	0.006	0.056	0.038	0.170	0.010
Influent (No Dilution)	05/02/00	3,800	15	71	16	220	11
Process (With Dilution)		350	1.300	6.100	1.300	19	0.900
Effluent		1.6	<0.001	0.008	0.002	0.020	<0.001
Influent (No Dilution)	06/07/00	590	4.400	20	2.400	110	3.200
Process (With Dilution)		84	0.590	2.200	0.360	10	0.420
Effluent		1.3	0.003	0.058	0.006	0.034	<0.001
Influent (No Dilution)	07/03/00	290	2.400	8.800	4.700	130	2.700
Process (With Dilution)		91	0.800	3.500	1.800	34	0.900
Effluent		1.1	0.002	0.024	0.002	0.016	0.038
Influent (No Dilution)	08/03/00	230	0.800	5.000	1.700	46	1.600
Process (With Dilution)		24	0.070	0.470	0.200	5.400	0.130
Effluent		1.0	0.002	0.028	0.004	0.068	0.002
Influent (No Dilution)	09/06/00	470	1.500	5.000	2.400	69	1.700
Process (With Dilution)		140	0.500	2.200	1.000	19	0.700
Effluent		2.4	0.002	0.023	0.004	0.05	<0.001
Influent (No Dilution)	10/05/00	260	0.200	1.300	0.400	11.000	1.000
Process (With Dilution)		150	0.200	0.710	0.160	7.600	0.540
Effluent		3.0	0.002	0.03	0.005	0.033	0.002
Influent (No Dilution)	11/02/00	43	0.110	0.440	0.130	3.500	0.360
Process (With Dilution)		58	0.220	0.970	0.200	10.000	0.670
Effluent		0.5	<0.001	0.005	0.002	0.022	0.002
Influent (No Dilution)	12/04/00	58	0.070	0.860	0.230	4.200	3.300
Process (With Dilution)		52	0.050	0.750	0.200	3.600	2.000
Effluent		1.0	<0.001	0.006	<0.001	0.007	<0.001
Influent (No Dilution)	01/04/01	25	0.040	0.006	<0.001	0.007	<0.001
Process (With Dilution)		24	0.040	0.130	0.040	1.900	2.000
Effluent		0.6	<0.001	0.014	0.001	0.013	0.004
Influent (No Dilution)	02/07/01	20	0.060	0.150	0.030	0.850	5.600
Process (With Dilution)		17	0.040	0.100	0.020	0.660	3.100
Effluent		0.8	<0.001	0.005	<0.001	0.007	0.014
Influent (No Dilution)	03/08/01	4.2	0.02	0.08	0.02	0.15	0.06
Process (With Dilution)		1.0	0.001	0.017	<0.001	0.009	0.008
Effluent		0.8	0.001	0.014	0.002	0.023	0.034
Influent (No Dilution)	05/03/01	0.6	0.012	0.005	<0.004	0.016	0.034
Process (With Dilution)		<0.4	<0.004	0.005	<0.004	<0.004	0.005
Effluent		0.7	<0.004	0.004	<0.004	<0.004	<0.004
Influent (No Dilution)	06/12/01	5.6	<0.001	0.005	0.003	0.03	0.17
Process (With Dilution)		1.1	<0.001	0.004	0.002	0.011	0.048
Effluent		0.3	<0.001	0.003	<0.001	0.004	<0.001
Influent (No Dilution)	08/06/01	4.5	0.001	0.025	<0.001	0.012	0.27
Process (With Dilution)		2.5	<0.001	0.055	<0.001	0.006	0.10
Effluent		0.3	<0.001	0.003	<0.001	0.004	<0.001

TABLE 1
SOIL VAPOR EXTRACTION SYSTEM SAMPLE ANALYTICAL RESULTS
7-Eleven Location No. 16439
All concentrations in parts per million by volume (ppmv).

Vapor Sample Identification	Sampling Date	Total Volatile Hydrocarbons	Benzene	Toluene	Ethylbenzene	Total Xylenes	MTBE
Source	07/09/03	20	0.08	0.63	0.07	0.48	1.9
Process		1.6	0.007	0.051	0.006	0.044	0.14
Effluent		0.18	<0.001	0.003	<0.001	0.011	0.002
Source	08/12/03	16	<0.1	0.4	<0.1	0.8	0.8
Process		0.22	<0.003	0.011	<0.003	<0.005	<0.005
Effluent		0.48	<0.003	0.003	0.004	0.038	<0.005
Mid #1		0.26	<0.003	<0.003	0.007	0.061	<0.005
Mid #2		0.37	<0.003	0.003	0.016	0.11	<0.005
Source	10/21/03	7.3	<0.001	0.005	0.002	0.074	0.02
Process/Effluent		0.4	<0.0005	0.0047	0.0021	0.027	<0.0005
Process	11/04/03	2.9	<0.0005	<0.0005	<0.0005	0.011	0.011
Effluent		1.1	<0.0005	<0.0005	<0.0005	0.0044	1.1
Source	12/02/03	1.3	<0.0005	0.014	<0.0005	0.0075	0.0059
Process		<0.1	<0.0005	0.0039	<0.0005	<0.0005	<0.0005
Effluent		<0.1	<0.0005	<0.0005	<0.0005	<0.0005	<0.0005
Source	02/18/04	<5.0	0.026	0.049	0.0093	0.0436	0.03
Process		<5.0	0.046	0.073	0.016	0.065	0.142
Effluent		<5.0	0.045	0.032	0.004	0.014	<0.001
Source	03/02/04	<5.0	<0.001	<0.001	<1.0	<5.0	<5.0
Process		<5.0	<0.001	<0.001	<0.001	<0.002	<0.001
Effluent		<5.0	<0.001	<0.001	<0.001	0.0129	<0.001
Source	04/07/04	<5.0	<0.001	0.026	0.0064	0.125	<0.001
Process		<5.0	<0.001	0.036	0.0057	0.037	<0.001
Effluent		<5.0	<0.001	0.026	0.0073	0.067	<0.001
Source	05/12/04	2.4	<0.001	0.02	0.011	0.132	<0.001
Process		3.7	<0.001	0.0014	0.0015	0.0169	<0.001
Effluent		1.2	<0.001	0.016	0.0055	0.042	<0.001
Source	06/02/04	<1.0	<0.001	0.0081	<0.001	0.0047	<0.001
Process		<1.0	<0.001	0.0032	<0.001	0.0063	<0.001
Effluent		<1.0	<0.001	0.0066	<0.001	0.0096	<0.001
Source	07/27/04	2.8	<0.001	0.028	0.056	0.596	<0.001
Process		<1.0	<0.001	0.0028	<0.001	0.0074	<0.001
Effluent		<1.0	<0.001	0.0048	<0.001	0.0208	<0.001
Source	08/10/04	1.1	0.025	0.098	0.013	0.116	0.018
Process		<1.0	<0.001	0.027	0.0031	0.0086	<0.001
Effluent		<1.0	<0.001	0.066	0.016	0.109	<0.001
Source	09/02/04	<1.0	0.0074	0.03	<0.001	0.0098	<0.001
Process		<1.0	0.023	0.054	<0.001	0.023	<0.001
Effluent		<1.0	<0.001	<0.001	<0.001	<0.002	<0.001
Source	10/07/04	<1.0	<0.001	0.039	0.004	0.15	<0.001
Process		<1.0	<0.001	0.022	<0.001	<0.001	<0.001
Mid #1		<1.0	<0.001	<0.001	<0.001	0.0029	<0.001
Mid #2		<1.0	<0.001	<0.001	<0.001	<0.001	0.149
Effluent		<1.0	<0.001	<0.001	<0.001	0.019	<0.001
Source	11/03/04	1.3	<0.001	0.0093	<0.001	0.019	1.320
Mid #1		<1.0	0.025	0.066	<0.001	0.092	0.760
Mid #2		<1.0	<0.001	0.019	<0.001	0.026	0.302
Effluent		<1.0	<0.001	0.019	<0.001	0.021	0.167

Notes:
< = Less than detection limit shown
MTBE = Methyl-t-butyl ether

TABLE 2
SUMMARY OF GROUNDWATER QUALITY AND ELEVATION DATA
7-Eleven Location No. 16439
All concentrations in micrograms per liter (ug/L).

Well No./TOC (ft/MSL)	Date	DTW (ft)	GW Elev. (ft/MSL)	TPHg	B	T	E	X	TAME	TBA	DIPE	ETBE	MTBE
MW-1	12/26/93	NM	NM	955	112	273	30	171	--	--	--	--	--
668.00	11/15/96	8.55	659.45	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	670
	2/28/97	6.03	661.97	<100	1.7	<1.0	<1.0	<1.0	--	--	--	--	720
	6/4/97	7.91	660.09	<50	10	<0.5	0.7	<0.5	--	--	--	--	1,800
	9/11/97	10.20	657.80	4,500	110	10	1.0	19	--	--	--	--	4,000
	11/5/97	8.80	659.20	7,000	860	1,000	87	540	--	--	--	--	2,800
	1/29/98	6.80	661.20	2,000	350	520	40	180	--	--	--	--	600
	5/14/98	5.61	662.39	59,000	2,500	4,000	770	2,400	--	--	--	--	4,500
	6/1/98	5.63	662.37	--	--	--	--	--	--	--	--	--	--
	8/12/98	NM	NM	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	12/2/98	NM	NM	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	2/17/99	NM	NM	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	5/12/99	6.83	661.17	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	8/4/99	8.63	659.37	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	11/11/99	8.95	659.05	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	2/15/00	7.80	660.20	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	4/26/00	7.49	660.51	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	8/14/00	9.16	658.84	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	11/13/00	13.89	654.11	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	1/16/01	7.88	660.12	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	4/24/01	5.94	662.06	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	7/26/01	8.32	659.68	<50	0.7	<0.5	6.3	<0.5	<0.5	21	<0.5	<0.5	63
	11/13/01	8.99	659.01	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	2/11/02	8.29	659.70	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	5/10/02	8.54	659.46	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	8/5/02	9.26	658.74	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	12/2/02	8.47	659.53	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	2/18/03	7.30	660.70	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	4/29/03	6.30	661.70	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	8/5/03	8.08	659.92	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	12/17/03	7.86	660.14	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	2/13/04	6.82	661.18	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	5/20/04	7.50	660.50	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	8/17/04	8.70	659.30	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	11/1/04	6.43	661.57	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	1/7/05	5.68	662.32	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	4/15/05	NM	NM	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
	7/25/05	NM	NM	NOT SAMPLED - IMPROPER SCREEN INTERVAL									
MW-2	11/15/96	9.47	659.85	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	1.0
669.38	2/28/97	6.17	663.15	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	0.9
	6/4/97	8.70	660.62	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	9/11/97	11.27	658.11	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	0.8
	11/5/97	9.76	659.62	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	1/29/98	7.37	662.01	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	2.5
	5/14/98	5.83	663.55	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	6/1/98	5.98	663.40	NOT SAMPLED									
	8/12/98	8.02	661.36	NOT SAMPLED									
	12/2/98	8.08	661.30	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	1.3
	2/17/99	6.97	662.41	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	5/12/99	7.69	661.69	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	8/4/99	9.73	659.65	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	11/11/99	10.07	659.31	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	2/15/00	8.61	660.77	<50	<0.5	<0.5	<0.5	<0.5	--	--	--	--	<0.5
	4/26/00	8.15	661.23	NOT SAMPLED									
669.38	8/14/00	10.30	659.08	NOT SAMPLED									
	11/13/00	9.95	659.43	NOT SAMPLED									
	1/16/01	8.64	660.74	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5
	4/24/01	6.28	663.10	NOT SAMPLED									
	7/26/01	9.36	660.02	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	3.3
	11/13/01	10.11	659.27	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	6.2
	2/11/02	9.45	659.93	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5
	5/10/02	9.61	659.77	NOT SAMPLED									
	8/5/02	10.52	658.86	NOT SAMPLED									
	12/2/02	9.15	660.23	NOT SAMPLED									
	2/18/03	7.96	661.42	<50	<0.5	<0.5	<0.5	<0.5	<0.5	<5.0	<0.5	<0.5	<0.5
	4/29/03	6.83	662.55	NOT SAMPLED									
	8/5/03	9.07	660.31	NOT SAMPLED									
	12/17/03	8.87	660.51	NOT SAMPLED									
	2/13/04	7.53	661.85	<50	<1.0	<5.0	<5.0	<5.0	<1.0	<10	<1.0	<1.0	<1.0