May 17, 2022

ADDENDUM TO
PHASE I AND LIMITED PHASE II

ENVIRONMENTAL SITE ASSESSMENT REPORT

For 19006 Holly Lane, Huntington Beach, California 92648

Prepared for:

Bonanni Development
5500 Bolsa Ave, Suite 120
Huntington Beach, Ca 92649

Prepared by:

Carlin Environmental Consulting, Inc.
2522 Chambers Rd. #100
Tustin, CA 92780
Telephone: (714) 508-1111

Project Number: 006-03

May 17, 2022

TO: Bonanni Development
5500 Bolsa Ave, Suite 120
Huntington Beach, Ca 92649

SUBJECT: Addendum to Phase I/ Limited Phase II Environmental Assessment Report for 19006 Holly Lane, Huntington Beach, California; prepared by Carlin Environmental Consulting, Inc., dated March 11, 2022.

The attached Addendum to the above-referenced Phase I Environmental Assessment Report has been prepared in response to correspondence with City of Huntington Beach. This Addendum addresses concerns regarding the active petroleum pipeline and associated easement located the subject site.

For any questions regarding this document or findings, please contact the undersigned.

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Attachment: Addendum to Phase I/Limited Phase II Environmental Site Assessment Report for 19006 Holly Lane, Huntington Beach, California

Distribution: (1) Addressee

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ATTACHMENTS

1.0 INTRODUCTION

This Phase I Environmental Site Assessment Addendum (Addendum) has been prepared to address potential environmental concerns associated with the petroleum pipeline previously noted at 19006 Holly Lane in Huntington Beach California.

The Site consists of approximately 1.89 acres in the southern area of Huntington Beach in Orange County, California (see **Figure 1 – Site Location Map**). From a regional perspective the Site is a triangular area located to the south of Garfield Avenue, northwest of Main Street, and east of Holly Lane, as illustrated on **Figure 2- Site Map**.

The Site is comprised of 5 Assessor Parcel Numbers (APNs). See below **Table 1** for a list of the APNs shown on **Figure 3** – **Parcel Map**.

TABLE 1

Assessor's Parcel Number
159-281-01
159-281-02
159-281-03
159-281-04
159-281-05

It is Carlin's understanding that the proposed future use of the Site will be a residential development referred to as HB TRI. Information provided by the Client shows that the subject property development will include 35 3-story residential units on approximately 1.89 acres. The project will also include the construction of associated on-site parking, common open space, and setbacks as shown on **Figure 4 – Property Development**.

2.0 PHASE I ENVIRONMENTAL SITE ASSESSMENT SYNOPSIS

The Phase I/ Limited Phase II Environmental Assessment Report that is the subject of this Addendum was prepared under current ASTM Standards. The Phase I/Phase II report is being utilized as a supporting document in the planning and permitting of the subject site into a residential development. It is our understanding that the original report and this Addendum are being relied

upon in the preparation of an addendum to an Environmental Impact Report (EIR). The EIR addendum prepared by EPD Solutions and submitted to the City of Huntington Beach Planning Department, is a requirement of the planning and permitting of the proposed project to satisfy the CEQA. During this process, various entities have determined that more specific attention should be devoted to the historical and future presence of the existing crude oil transmission pipeline located on the 10-foot easement in the center of the development (see **Figure 6**). While the Carlin reports published to date have identified that relatively extensive activities related to oil exploration and development have been conducted on the site historically, the reports have not specifically addressed the historical and future presence of the pipeline and its potential specific impact on the site. This addendum specifically addresses that issue.

A previous Phase I Environmental Site Assessment, conducted by Group Delta, which was documented and referenced in the Carlin report noted the presence of the pipeline at the subject site: The Group Delta report provided the following statement: "The Northam pipeline is operated by Crimson Pipeline L.P. (Crimson) and contains crude oil. The Northam pipeline was active as of June 14, 2019. The pipeline observed on Site was marked "Crimson Pipeline LP" and appears to be the Northam pipeline. No records of past releases or violations associated with this pipeline was identified on other searched databases. Any release from this pipeline would be the responsibility of the pipeline owner. Based on this information, the pipeline is not expected to represent a significant environmental concern."

Carlin did not specifically identify this pipeline as a specific Recognized Environmental Concern (REC) in the Phase I report. Alternatively, it was lumped into the site wide historical oil field issues described below.

3.0 RECOGNIZED ENVIRONMENTAL CONCERN (REC)

According to the ASTM E 1527-13, there are three categories of REC that are defined for use to identify a particular, potential environmental impairment on a property. RECs, Controlled RECs, and Historical RECs are described as recognized environmental conditions, either current, controlled, or historical, that involves a release of hazardous substances or petroleum products. It is typically standard care and practice to additionally identify environmental issues that have the potential to become RECs. In this case, Carlin identified the existence of oil wells and associated infrastructure at the subject site as an REC. While the pipeline that is the subject of this Addendum would be included in that associated infrastructure, Carlin did not find any specific database records or available information that indicated past releases associated with

the pipeline that would warrant the classification as a REC, or that would not have been addressed by the forthcoming soil and methane investigation at the Site. Carlin does however recognize that the presence of this pipeline warrants special handling during upcoming construction and should be incorporated into the long term monitoring and maintenance of the development.

4.0 LIMITED PHASE II SOIL AND METHANE INVESTIGATION

The Phase II soil and methane investigation portion of the above-mentioned report was conducted to investigate oil field issues at the subject site including, but not limited to, oil wells and associated documented and potentially undocumented infrastructure at the subject site. The investigation was conducted as required for the proposed development project in order to meet the requirements (Specification No. 431-92 and 429) of the City of Huntington Beach and the City of Huntington Beach Fire Department (HBFD). Based on Carlin's Phase I Environmental Assessment review of the site location and published maps it was determined that there are four (4) former oil wells located on the property (see **Figure 5**). Therefore, it is our understanding that the proposed structure will require a methane barrier. It is also our understanding that because the total square footage of the proposed development is greater than 5,000 square feet and has more than one or two families in each building, a methane investigation is required by the Huntington Beach Fire Department.

This work was conducted under an HBFD approved *Work Plan and Proposed Investigation for the Property located at 19006 Holly Lane, Huntington Beach, CA* submitted by Carlin January 7, 2021 (Work Plan) which was approved February 17, 2021. The results of this investigation are included in the Limited Phase II Environmental Site Assessment Subsurface Investigation (Phase II) Report dated March 11, 2022.

Included in the Work Plan was the identification and location of a pipeline vault, and a sample location was placed in close proximity to this feature and included in the investigation (see sample location 6 on **Figure 5**). Additionally, investigation sample locations occurred on either side of the existing pipeline alignment. The pipeline alignment provided by Crimson is included as **Figure 6**). The pipeline alignment was identified and flagged during the investigation DigAlert notification prior to onsite drilling activities.

The results of the investigation were provided to HBFD in the Phase II described above. To summarize; the results of the investigation detected TPH in soil samples at various locations (not

coincident with the pipeline alignment) at a maximum of 150 mg/kg (ppm). All detections were measured at concentrations below the HB City Specification screening limit of 500 mg/kg (ppm) as shown on **Table 1**.

While the results of the investigation addressed City Specification and HBFD requirements relating to TPH and methane, it also concluded that VOC soil vapor exists beneath the site. VOCs encountered in soil gas were detected at concentrations below applicable ESLs (as shown on **Table 2**). Although this VOC soil vapor can be mitigated, the source of this soil vapor is currently unknown. It is Carlin's opinion that there is no indication in the data collected that soil contamination is causing VOC soil vapor, and the source could be offsite, or it could also be from onsite historical automotive repair operations. It is beyond the scope of the current Phase I/Phase II investigation to determine the source of any detected contamination.

Based on the City Specification 429, and as a concluding recommendation based on the findings of the Phase II investigation, methane mitigation measures are required for the Site and will be designed by Carlin to include a chemically compatible membrane capable of precluding methane and soil vapor intrusion. The mitigation measures will be installed in all future structures.

It is Carlin's opinion that any significant or extensive soil contamination resulting from the existing pipeline would have been detected during the investigation. It is also Carlin's opinion that the required mitigation measures would serve as a secondary contingency measure for any unlikely, but possible, future issues that may occur along the pipeline alignment.

5.0 DTSC VOLUNTARY OVERSIGHT

The results of the soil and methane investigation were included in the Phase I/Limited Phase II report and submitted to HBFD in accordance with the previously noted requirements. The HBFD Review Comments dated March 31, 2022 noted that the review of the detected soil vapor VOC concentrations that are not TPH (e.g., TCE, PCE, benzene, etc.), and that additional investigation, and evaluations of vapor intrusion potential are not under the purview of the HBFD's soil cleanup standard for TPH (City Specification 431-92). As such, Carlin was directed to seek regulatory case oversight under either the Regional Water Quality Control Board (RWQCB) or the California Department of Toxic Substances Control (DTSC).

Carlin has since submitted a Request for Lead Agency Oversight Application to DTSC. The purpose of the application is to provide the DTSC and the Regional Water Quality Control Board (Water

Board) sufficient information to determine which agency will be the appropriate lead agency to provide oversight for the assessment of the proposed mitigation measures for the site.

The HBFD will require a written determination of no further action (or similar) from either agency for the proposed residential development. Following that, the HBFD will require the project proponent to submit documentation for review that demonstrates compliance with City Specification Nos. 431-92 and 429. The DTSC and the HBFD will be receiving all published documents related to the subject site, including this Addendum.

6.0 PIPELINE REQUIREMENTS AND RESPONSIBILITIES

Carlin contacted the CALFIRE Office of the State Fire Marshal Pipeline Safety Division to confirm that active pipeline operators, in this case Crimson, are required to submit periodic reports demonstrating compliance with directed testing and maintenance policies and procedures. These reports are available to City and/or Government agencies by written request. Since these records are not readily available to the public, it is assumed that there are existing contingency measures provided by Crimson and on record with CALFIRE. The CALFIRE Bulletin regarding encroachments into or on pipeline easements is included as **Appendix A**.

Carlin also contacted Crimson to confirm guidelines for proposed development projects in close proximity to active pipelines. These requirements and guidelines are attached as **Appendix B**. Crimson also provided a Notice of Improvement Letter, attached as **Appendix C**, that specifies requirements for plan submittals, onsite construction observations, and notifications.

Bonanni Development has confirmed that the proposed development professionals have been working with Crimson to ensure of the above-described requirements are met to the satisfaction of all interested parties.

7.0 CONCLUSIONS AND RECOMMENDATIONS

- Carlin did not specifically identify the pipeline in the Phase I Environmental Assessment Report, but instead included the pipeline in a site-wide assessment of historical oil field related activities.
- The implementation of the approved work plan for the investigation of the above-mentioned oil field issues is the subject of a Limited Phase II Report.

- Carlin would categorize the presence of the pipeline as a Potential REC based on the possibility that a leak or other release from the pipeline could happen in the future. Carlin does however recognize that the presence of this pipeline warrants special handling during upcoming construction and should be incorporated into the long-term monitoring and maintenance of the development.
- The Bonanni Development team is currently working with Crimson to ensure that all pipeline construction requirements are being met. These requirements will not only address issues during the construction and development process but will include long term monitoring and maintenance methods and procedures.
- In the event of a release or leak, depending on the nature, extent, and composition of the material(s), there is a process already in place which determines agency oversight.
- Pipeline compliance, testing, and any required contingency measures are the responsibility of Crimson Pipeline and are already in place and on record with CALFIRE.
- The four abandoned oil wells are in the process of being re-abandoned and leak tested in accordance with/and in cooperation with CalGEM. These wells will receive vent cones and the proposed development infrastructure accommodates CalGEMs requirements regarding construction.
- Well re-abandonment, methane testing, and resulting methane mitigation measures have been developed with and will be installed in accordance with City of HB and HBFD Specifications.
- All onsite grading activities, as recommended in the Limited Phase II Report, and as required by Crimson, will be conducted and observed by qualified professionals.
- Results of VOCs detected during the Limited Phase II investigation will be reviewed and addressed through voluntary oversight by either DTSC or the RWQCB (as determined by DTSC).
- As required by the City Specification 429, and as a concluding recommendation based on the findings of the Phase II investigation, methane mitigation measures are required for the Site and will be designed by Carlin to include a chemically compatible membrane capable of precluding methane and soil vapor intrusion. The mitigation measures will be installed in all future structures.
- These mitigation measures will serve as a secondary contingency measure for any issues that, while unlikely, but could potentially arise in the future from the existing pipeline.

8.0 REFERENCES

California Department of Toxic Substances Control (DTSC), et al. 2015. *Advisory: Active Soil Gas Investigations*

HBFD; 2010; *City Specification No. 422 Reference to Huntington Beach Municipal Code Sections 15.32.090 & 15.32.100 Oil Well Abandonment Permit Process*; Huntington Beach Fire Department; February 2010.

HBFD; 2016; *City Specification No. 429 Reference to Huntington Beach Municipal Code Sections 17.04085, 17.56.100, and 17.56.730 Methane Mitigation Requirements*; Huntington Beach Fire Department; September 2016

HBFD; 2014; *City Specification No. 431-92 Soil Quality Standard*; Huntington Beach Fire Department; January 2014.

HBFD; 2010; *City Specification No. 431 Reference to Huntington Beach Municipal Code Section 15.20 & HBFC Section 105.7.6.2 Oil Field Gas Fired Appliances – Stationary and Portable*; Huntington Beach Fire Department; March 2010.

Group Delta Consultants, Inc.; *Phase I Environmental Assessment Garfield Avenue and Main Street Huntington Beach*, California; February 3, 2021

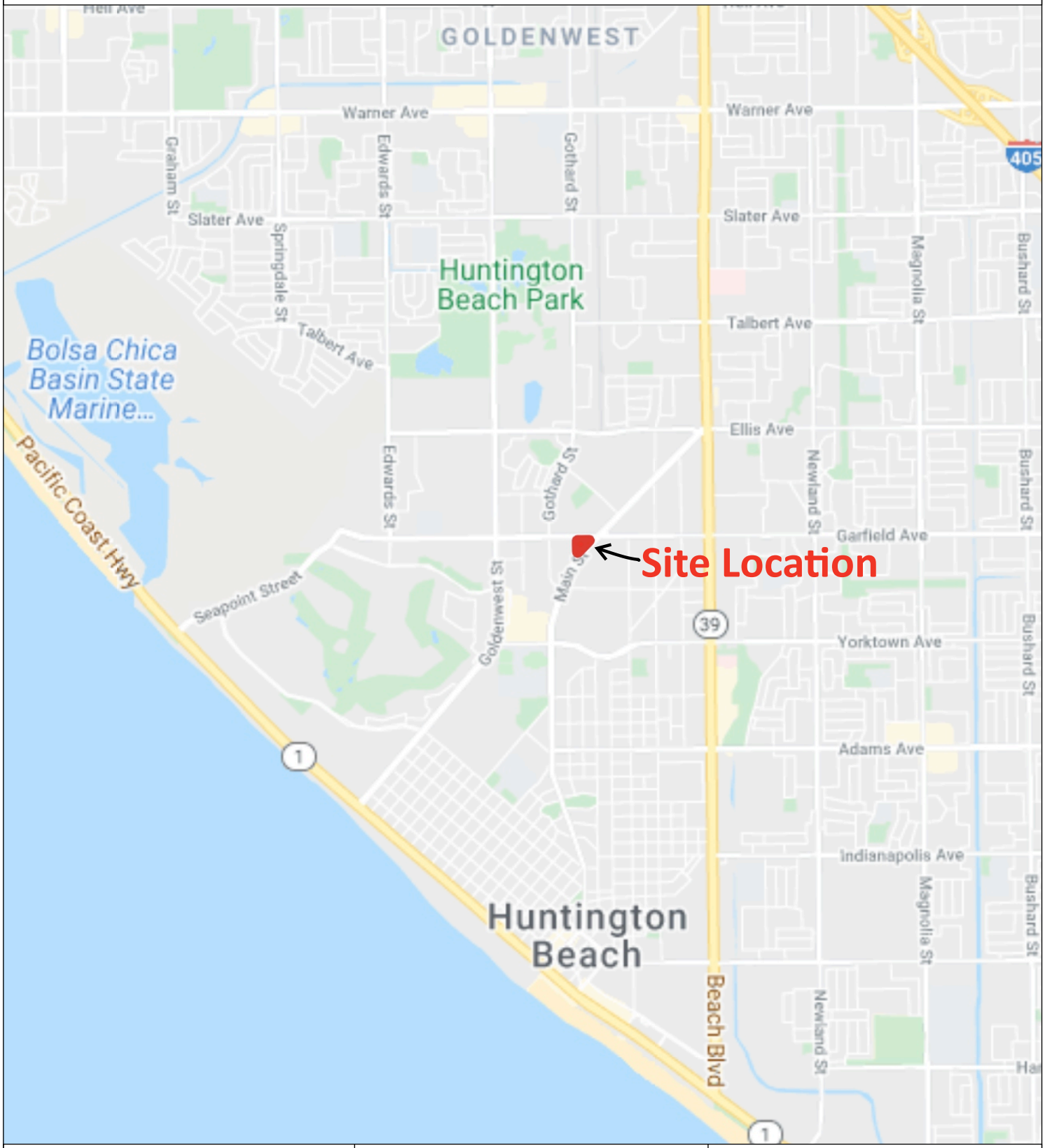
Geotracker https://geotracker.waterboards.ca.gov/

GAMA Online Tools: https://www.waterboards.ca.gov/water_issues/programs/gama/

DOGGR Well Finder: https://www.conservation.ca.gov/calgem/Pages/Wellfinder.aspx

FIGURES

Figure 1: Site Location Map



SITE LOCATION MAP
19006 Holly Lane
Huntington Beach, CA

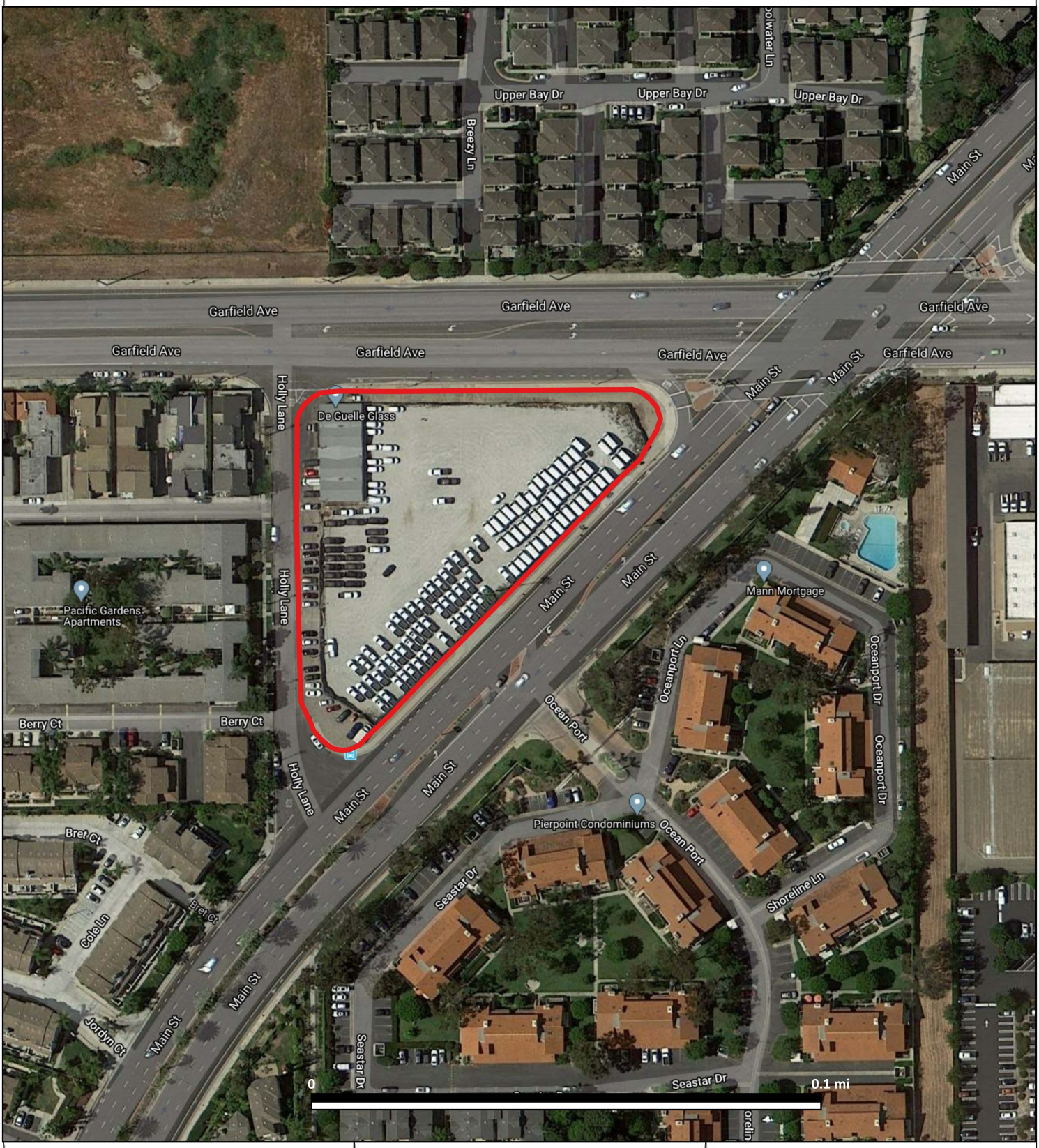
LEGEND
Site Location:

N

Carlin Environmental Consulting
Assessment • Remediation • Mitigation Design

Prepared by: JQ
Date: 7/14/2020

Figure 2: Site Map



SITE MAP
19006 Holly Lane
Huntington Beach, CA

LEGEND
Site Location:

N

Carlin Environmental Consulting
Assessment • Remediation • Mitigation Design

Prepared by: JQ
Date: 7/14/2020

Figure 3

159-28

POR N1/2, N1/2, SEC. 2, T6S, R11W

1" = 100'

32

N.1/4 COR., SEC. 2-6-11

(ABAND. P.E. R.R. R/W) 14

TRACT

LOT C
7
0.78 AC.

LOT A
5
2.83 AC.

282

PROJECT
937-40-002-161
13
6.22 AC.

TRACT
PROJECT
937-40-332-335
LOT 18 1
0.279AC.
NO. 10511

LOT B
6
0.16 AC.

NO. 16287

TRACT
PROJECT
937-40-277-296
LOT 16 1
1.288AC.
NO. 14347

GARFIELD STREET
BLK. A
11
1.92 AC.
ADD.

AVENUE 60'

(SUMMIT ST.)

23-40

MAIN

(23RD. ST.)

STREET

AVENUE

GARFIELD

GARFIELD STREET
BLK. A
ADD.

LOT 33
4
281
5

1 2 3 4 5 6 7 8 9 10 11

HOLLY 60'

STREET 60'

BRYNN* COURT

BRYNN COURT EAST*

T. 5 S., R.11W.
T. 6 S., R.11W.

49

111-15

MARCH 1980

GARFIELD STREET ADD.
TRACT NO. 11511
TRACT NO. 14347
TRACT NO. 16287

M.M. 7-27,28
M.M. 455-13 to 17 inc.
M.M. 689-35,36
M.M. 837-46,47

NOTE - ASSESSOR'S BLOCK & PARCEL NUMBERS SHOWN IN CIRCLES

ASSESSOR'S MAP
BOOK 159 PAGE 28
COUNTY OF ORANGE

Figure 4

Scheme E Project Summary

3-Stories

Total Site Area: ± 1.89 Gross Acres (± 1.60 Net Acres)

Total Units: **34 Dwelling Units**
- (12) 2A (2-Bed, ±1,350 S.F.) (35.3%)
- (14) 3A (3-Bed, ±1,700 S.F.) (41.2%)
- (8) 3B (3-Bed+Den, ±1,800 S.F.) (23.5%)

Density: 18.0 DU/Acre (Gross)

Parking:

Required: **96 Spaces** (HBMC 231.04)
- (12) 2-Bedroom x 2.0 Spaces = 24.0 Spaces
- (22) 3-Bedroom x 2.5 Spaces = 55.0 Spaces
- Guest: 0.5 sp / unit = 17.0 Spaces

Required Covered Spaces (1 per unit) = 34 Spaces

Required Accessible (CBC 1109A) = 2 Spaces
Unassigned Open (28 x 5%) 2 Spaces

Provided: **96 Spaces**
- Garage: 68 Spaces
- Open (off-street) : 22 Spaces
- Open (on-street parallel) 6 Spaces

Common Open Space (HSSP III-20):

Required: **11,300 S.F.**
(300 S.F. per 2-Bed, 350 S.F per 3-Bed)
(10 FT minimum dimension, shall not include required front or street side setback areas)
(at least one amenity, such as a clubhouse, swimming pool, tennis court, volleyball court, outdoor cooking facility, or other recreation facility.)

Provided: **± 12,300 S.F.**

Setbacks to Dwelling (HSSP III-20):
- Front Yard: 15 ft.
  (propose Main Street as FRONT)
- Exterior (Street) Side Yard: 10 ft.
  (propose Holly Street and Garfield Ave as side streets)
- Interior Side Yard: 5 ft.
- Rear Yard: 5 ft.
- Building Separation: 15 ft. for 2-Story, 20 ft for 3-Story

Vent Location & 10' radius

N

SCALE: 1" = 30'
0' 30' 60' 90' 120'

SCHEME E (3-STORIES)

BONANNI DEVELOPMENT

MAIN AND GARFIELD

HUNTINGTON BEACH, CA

YIELD STUDY

 | 2020083 | 03-31-2020

ARCHITECTS . PLANNERS . DESIGNERS
WHA
ORANGE COUNTY . LOS ANGELES . BAY AREA

Figure 5 - Investigation Probe Locations

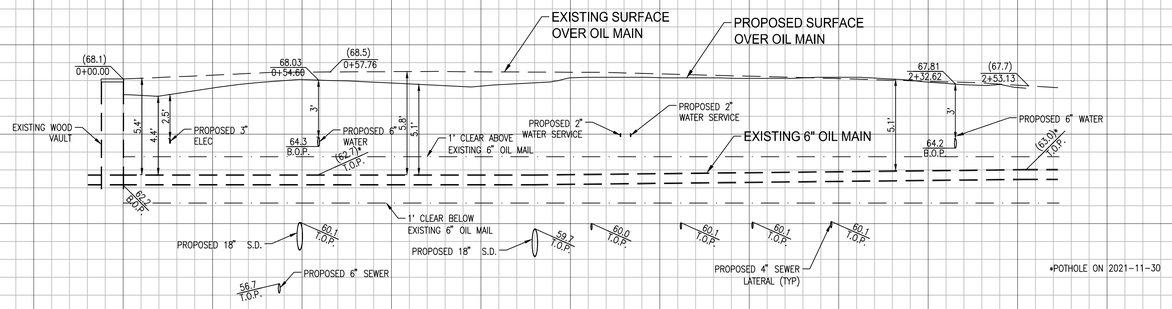
Modified from Google Earth.

Site Location
Wells
Proposed Probe Locations
Approximate Structure Locations (1938)
Approximate Tank Locations (1938)

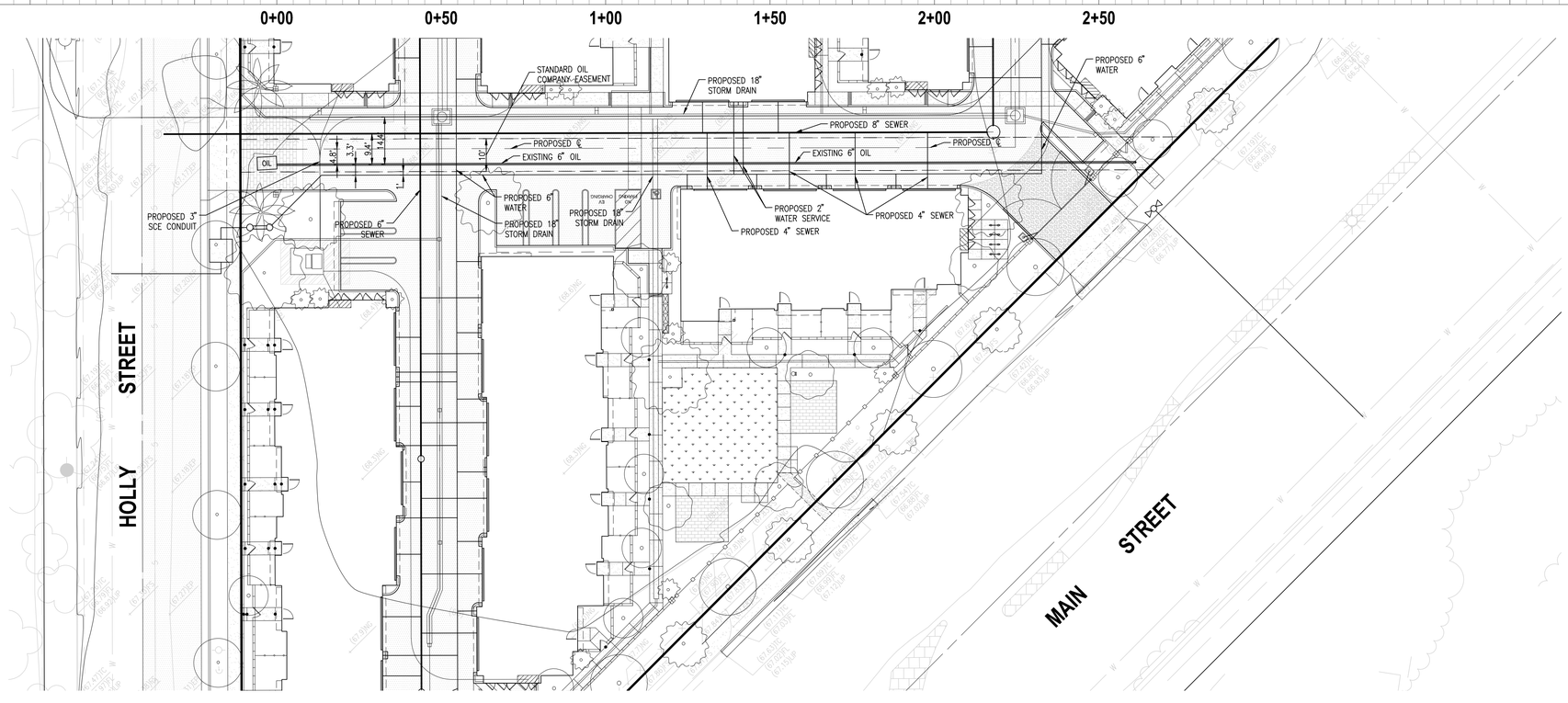
19006 Holly Lane, Huntington Beach, California

Carlin Environmental Consulting, Inc.
Date: 3/11/2020 Prepared by: JQ

Figure 6



EXISTING CRIMSON PIPE LINE



PROFILE SCALE	
HORIZ.	1"=20'
VERT.	1"=4'

N

20 10 0 20

SCALE IN FEET
1 inch = 20 ft.

WALDEN & ASSOCIATES
CIVIL ENGINEERS
LAND SURVEYORS
PLANNERS
2552 WHITE ROAD, SUITE B, IRVINE, CA 92614
(949) 660-0110 FAX: 660-0418

EXISTING OIL LINE
IN
TENTATIVE TRACT 19118
RESIDENTIAL DEVELOPMENT SITE
HUNTINGTON BEACH, CA

JOB NUMBER	2026-844-001
DATE:	02/2022
DRAWN:	SK
CHECKED:	DB
SHEET	1 OF 1

TABLES

Table 1

Client:	Carlin Environmental Consulting, Inc.	Lab Job No.:	AG201004
Project:	Bonanni Development/Holly Lane HB		
Project Site:	19006 Holly Lane, Huntington Beach, CA	Date	01-03/04-2022
Matrix:	Soil	Date	01-04-2022
Batch No. for TPHg:	AMA04-GS1/AMA05-GS1	Date	01-05-2022
Batch No. for TPHd&o:	BA04/BA05-DS1	Date	01-04/05-2022
		Date	01-11-2022

EPA 8015B (Total Petroleum Hydrocarbons) Reporting Unit: mg/kg (ppm)

Sample Location	Sample ID	Lab ID	DF (TPH-G)	C5-C12 TPH-G*	Surrog Rec.% TPH-G	DF (TPH-D)	C13-C23	C24-C40	Surrog Rec.% TPH-D
	MDL			0.2			1	20	
	PQL			0.5			5	40	
	Method Blank		1	ND	88	1	ND	ND	101
CEC - 1	CEC#1@1'	AG201004-1	1	ND	90	1	ND	ND	90
	CEC#1@5'	AG201004-2	1	ND	92	1	**20.8**	**62.9**	87
	CEC#1@10'	AG201004-3	1	ND	90	1	**130**	**177**	73
	CEC#1@20'	AG201004-4	1	ND	94	1	ND	ND	83
CEC - 2	CEC#2@1'	AG201004-5	1	ND	87	1	**31.3**	**120**	74
	CEC#2@5'	AG201004-6	1	ND	89	1	**1.5J**	ND	90
	CEC#2@10'	AG201004-7	1	ND	92	1	ND	ND	90
	CEC#2@20'	AG201004-8	1	ND	93	1	ND	ND	90
CEC-3	CEC#3@1'	AG201004-9	1	ND	91	1	ND	ND	94
	CEC#3@5'	AG201004-10	1	ND	93	1	ND	ND	74
	CEC#3@10'	AG201004-11	1	ND	92	1	ND	ND	82
	CEC#3@20'	AG201004-12	1	ND	94	1	ND	ND	72
CEC - 4	CEC#4@1'	AG201004-13	1	ND	88	1	**4.3J**	**30.9J**	94
	CEC#4@5'	AG201004-14	1	ND	85	1	ND	ND	111
	CEC#4@10'	AG201004-15	1	ND	91	1	ND	ND	88
	CEC#4@20'	AG201004-16	1	ND	101	1	ND	ND	101
CEC - 5	CEC#5@1'	AG201004-17	1	ND	97	1	**1.8J**	**27.2J**	91
	CEC#5@5'	AG201004-18	1	ND	102	1	**3.0J**	**24.7J**	91
	CEC#5@10'	AG201004-19	1	ND	97	1	ND	ND	103
	CEC#5@20'	AG201004-20	1	ND	95	1	ND	ND	100
CEC - 6	CEC#6@1'	AG201004-21	1	ND	97	1	**1.4J**	**22.0J**	97
	CEC#6@5'	AG201004-22	1	ND	96	1	**3.1J**	**48.0**	99
	CEC#6@10'	AG201004-23	1	ND	101	1	ND	ND	87
	CEC#6@20'	AG201004-24	1	ND	97	1	ND	ND	90
CEC - 7	CEC#7@1'	AG201004-25	1	ND	92	1	**8.4**	**124**	100
	CEC#7@5'	AG201004-26	1	ND	98	1	ND	ND	86
	CEC#7@10'	AG201004-27	1	ND	98	1	**22.1**	**150**	101
	CEC#7@20'	AG201004-28	1	ND	99	1	ND	ND	99
CEC-8	CEC#8@1'	AG201004-29	1	ND	92	1	**6.0**	**73.6**	86
	CEC#8@5'	AG201004-30	1	ND	98	1	**8.1**	**65.8**	87
	CEC#8@10'	AG201004-31	1	ND	98	1	ND	ND	101
	CEC#8@20'	AG201004-32	1	ND	98	1	ND	ND	105
CEC - 9	CEC#9@1'	AG201004-33	1	ND	97	1	**1.6J**	**37.7**	101
	CEC#9@5'	AG201004-34	1	ND	96	1	**2.6J**	**40.7**	108
	CEC#9@10'	AG201004-35	1	ND	99	1	ND	ND	104
	CEC#9@20'	AG201004-36	1	ND	98	1	ND	ND	
CEC - 10	CEC#10@1'	AG201004-37	1	ND	99	1	**5.5**	**37.1**	108
	CEC#10@5'	AG201004-38	1	ND	95	1	ND	ND	99
	CEC#10@10'	AG201004-39	1	ND	97	1	ND	ND	93
	CEC#10@20'	AG201004-40	1	ND	97	1	ND	ND	98
						City Spec ESL**	**< 500**	**< 500**	

* Gasoline Range TPH result is obtained from purge and trap analysis;

MDL: Method Detection Limit; PQL: Practical Quantitation Limit;

ND: Not Detected (below MDL); J: Result is between MDL and PQL. Note: Surrogate recovery acceptance limits are 70-130%.

** Huntington Beach City Specification NO. 431-92 Screening Level for Hydrocarbon Remediation for TPH | Residential and Recreational Screening Levels

Table 2. Soil Vapor Sample Summary Results

Field Sample ID	Sample Description	Sample Date	Freon 12	Trichloro-fluoromethane	Chloromethane	Freon 113	Acetone	Carbon Disulfide	Isopropanol (IPA)	Methylene Chloride	n-Hexane	2-Butanone	Benzene	Trichloroethene	Toluene	Tetrachloroethene	Ethylbenzene	m,p-Xylenes	o-Xylene	Styrene	1,2,4-Trimethlbenzene	Xylene (total)
		Units:	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3	ug/m^3		ug/m^3
CEC-1 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	ND	38.0	4.3	7.0	31.0	1.9	ND	ND	3.6	5.9	2.8	2.0	7.9	3.2	ND	ND	11.0
CEC-1 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	96.0	91.0	ND	42.0	1100.0	ND	61.0	ND	110.0	ND	ND	ND	ND	ND	ND	ND
CEC-1 @ 15'	Soil Vapor	2/2/2022	ND	ND	1.1	ND	26.0	ND	12.0	16.0	ND	ND	ND	2.3	3.3	7.6	ND	6.1	2.5	ND	ND	8.5
CEC-2 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	ND	ND	110.0	ND	ND	12.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-2 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	ND	81.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-2 @ 15'	Soil Vapor	2/2/2022	ND	ND	ND	ND	32.0	6.3	ND	ND	6.0	38.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-3 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	ND	ND	23.0	ND	12.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-3 @ 10'	Soil Vapor	2/2/2022	ND	ND	0.94	ND	26.0	4.6	ND	ND	ND	18.0	ND	ND	3.2	12.0	2.3	4.5	ND	4.1	3.2	4.5
CEC-3 @ 15'	Soil Vapor	2/2/2022	ND	ND	ND	ND	10.0	ND	ND	9.4	ND	33.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-4 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	13.00	20.0	19.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-4 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	20.0	16.0	ND	3.5	ND	14.0	ND	ND	ND	ND	ND	ND	ND	4.0	ND	ND
CEC-4 @ 15'	Soil Vapor	2/2/2022	ND	ND	ND	ND	22.0	26.0	ND	ND	ND	ND	ND	ND	ND	8.3	ND	ND	ND	4.6	ND	ND
CEC-5 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	ND	48.0	26.0		7.5	2.0	15.0	3.7	13.0	5.5	5.5	ND	6.4	4.4	3.9	2.5	11.0
CEC-5 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	50.0	13.0	9.2	7.4	ND	20.0	3.3	6.4	9.8	ND	ND	ND	4.0	3.8	ND	4.0
CEC-5 @ 15'	Soil Vapor	2/2/2022	ND	ND	0.91	ND	69.0	2.9	9.4	9.5	2..2	6.4	2.1	8.0	7.4	ND	2.1	6.5	4.5	3.7	2.7	11.0
CEC-6 @ 5'	Soil Vapor	2/2/2022	2.60	2.70	ND	ND	49.0	15.0	14.0	17.0	2.2	4.4	1.5	4.6	5.4	ND	ND	4.9	2.1	4.7	ND	7.0
CEC-6 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	37.0	ND	20.0	8.2	ND	22.0	ND	ND	6.0	24.0	ND	ND	ND	ND	ND	ND
CEC-6 @ 15'	Soil Vapor	2/2/2022	ND	ND	ND	ND	100.0	ND	ND	22.0	ND	ND	ND	140.0	ND	ND	ND	ND	ND	ND	ND	ND
CEC-7 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	ND	22.0	16.0	ND	4.3	ND	ND	ND	ND	4.0	ND	ND	ND	3.5	3.9	ND	3.5
CEC-7 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	ND	19.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-7 @ 15'	Soil Vapor	2/2/2022	ND	ND	ND	ND	45.0	ND	ND	ND	ND	46.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-8 @ 5'	Soil Vapor	2/2/2022	2.4	ND	ND	ND	16.0	15.0	ND	2.3	ND	11.0	ND	ND	2.3	3.8		4.2	2.1	4.0	3.2	6.4
CEC-8 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	28.0	3.4	ND	ND	ND	29.0	ND	ND	ND	ND	ND	ND	ND	4.3	ND	ND
CEC-8 @ 15'	Soil Vapor	2/2/2022	NO RESULTS																			
CEC-9 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	ND	13.0	27.0	ND	ND	27.0	ND	4.2	ND	5.6	30.0	ND	ND	ND	ND	ND	ND
CEC-9 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	ND	42.0	ND	ND	ND	ND	ND	ND	9.3	ND	ND	ND	ND	ND	ND	ND
CEC-9 @ 15'	Soil Vapor	2/2/2022	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
CEC-10 @ 5'	Soil Vapor	2/2/2022	ND	ND	ND	ND	15.0	14.0	ND	ND	5.3	11.0	5.0	ND	9.2	14.0	ND	ND	ND	3.6	ND	ND
CEC-10 @ 10'	Soil Vapor	2/2/2022	ND	ND	ND	ND	15.0	17.0	ND	ND	4.4	26.0	3.7	ND	9.5	11.0	ND	ND	ND	ND	ND	ND
CEC-10 @ 15'	Soil Vapor	2/2/2022	2.5	ND	ND	ND	23.0	7.7	ND	4.3	4.7	6.7	4.8	4.7	12.0	42.0	3.3	5.8	2.9	3.2	3.3	8.6
CHHSL Residential ESL**(units: ug/m^3)			NE	NE	NE	NE	NE	NE	NE	NE	NE	NE	85	1,300	32,000	470	1,100	1,650,000	740,000	NE	NE	NE

** California Human Health Screening Levels - Table 2. Soil-Gas Screening Numbers for Volatile Chemicals below Buildings Constructed with Engineered Fill below Sub-Slab Gravel

APPENDICIES

California State Fire Marshal
Information Bulletin 03-001

Issued: June 20, 2003
(Revised September 25, 2019)

ENCROACHMENTS INTO or ON PIPELINE EASEMENTS

The purpose of this informational bulletin is to delineate the position of the State Fire Marshal regarding encroachments onto the pipeline easements.

Section 51014.6 of the California Government Code states, "(a) Effective January 1, 1987, no person, other than the pipeline operator, shall do any of the following with respect to any pipeline easement: (1) Build, erect, or create a structure or improvement within the pipeline easement or permit the building, erection, or creation thereof. (2) Build, erect, or create a structure, fence, wall, or obstruction adjacent to any pipeline easement which would prevent complete and unimpaired surface access to the easement, or permit the building, erection, or creation thereof. (b) No shrubbery or shielding shall be installed on the pipeline easement which would impair aerial observation of the pipeline easement. This subdivision does not prevent the revegetation of any landscape disturbed within a pipeline easement as a result of construction the pipeline and does not prevent the holder of the underlying fee interest or the holder's tenant from planting and harvesting seasonal agricultural crops on a pipeline easement. (c) This section does not prohibit a pipeline operator from performing any necessary activities within a pipeline easement, including, but not limited to, the construction, replacement, relocation, repair, or operation of the pipeline.

It is the position of the State Fire Marshal that nothing shall encroach into or upon the pipeline easement, which would impede the pipeline operator from complete and unobstructed surface access along the pipeline right of way. Nor shall there be any obstructions, which would shield the pipeline right of way from observation. In the interest of public safety and the protection of the environment, it is imperative that the pipeline operator visually assesses the conditions along the easement to ensure the integrity of the pipeline.

It is the responsibility of the pipeline operator to ensure they have unimpeded surface access and to be able to physically observe all portions of their pipeline rights of way. In cases where this is not possible, the pipeline operator shall inform the State Fire Marshal. The State Fire Marshal shall in conjunction with the pipeline operator resolve the issue.

Questions regarding the issue of pipeline encroachment can be addressed to:

CAL FIRE-Office of the State Fire Marshal
Pipeline Safety Division
3780 Kilroy Airport Way #500
Long Beach, CA 90806 Phone:(562) 497-0350

CRIMSON PIPELINE L.P.
3760 Kilroy Airport Way, Suite 300
Long Beach, CA 90806

Construction Requirements in the Proximity of Crimson Pipelines

Crimson Pipeline L.P. (Crimson) is committed to the continued, safe operation of its pipeline. The listed construction requirements are designed to help ensure that the pipeline is protected from excavation damage, encroachment or other risks that could adversely impact the pipeline or prevent required inspection and maintenance activities.

1. Crimson requires two copies of any proposed plans for work within Crimson's right-of-way. Plans shall be provided 45 calendar days prior to commencement of work to the address listed above.

2. Above ground structures and improvements that interfere with the construction, maintenance or repair of the pipeline are prohibited within Crimson's right-of-way. Structures and improvements include, but are not limited to, buildings, fences and walls.

3. Landscaped areas are permitted within the right-of-way. Trees and large bushes that impede the visual inspection of the ground surface are not permitted within the right-of-way. Crimson shall review all plans that encroach the pipeline and the pipeline right of way prior to 4.

4. Federal law prohibits removing, damaging or defacing of pipelines, pipeline signs, or other appurtenances installed on the pipelines right of way.

5. Other utilities may be installed within the right-of-way with permission from Crimson. Such utilities must maintain a minimum of 5 feet parallel and 1-foot vertical clearances under Crimson's utilities unless approved in writing by Crimson prior to their installation. All clearances must conform to existing state and federal regulations.

6. A minimum of 3 feet, but not more than 6 feet of cover must be maintained over the pipeline at all times, unless otherwise approved by Crimson Pipeline in writing. The ground contour cannot be changed within the right-of-way without prior written permission by Crimson.

7. Proposed roads and utility crossings should cross Crimson's right-of-way as close to 90 degrees as possible. If, in Crimson's sole judgment, additional precautions are required to protect Crimson's pipeline, Crimson shall review and approve the construction plans in writing prior to the start of construction.

8. California State Law requires that parties notify Underground Service Alert at 1-800-227-2600, two full working days prior to digging.

9. All work on/or around the Crimson facility must comply with appropriate sections of Code of Federal Regulations Title 49, Part 195 - **TRANSPORTATION OF HAZARDOUS LIQUIDS BY PIPELINE.**

10. Crimson may choose to have an inspector on-site during any grading or excavation activities near the Crimson pipeline. Arrangements may be made for on-site inspection by contacting Crimson Utilities Coordinator at the address shown above.

11. Crimson requires that all excavation in the vicinity of the pipeline be done with hand tools in the presence of the Crimson's inspector consistent with California State Law requirements. Any damage to the pipeline shall be reported immediately. Crimson shall perform the necessary repair to insure the safety of the public safety. Crimson shall be reimbursed for all repair work necessary to continue with the safe, reliable operation of the pipeline.

12. In an emergency, including any damage or suspected damage to the Crimson pipeline, immediately notify Crimson at: 1-866-351-7473.

13. Any questions regarding construction activities in the vicinity of Crimson's pipeline shall be directed to:

UTILITIES COORDINATOR
Ph: (562) 285-4112 or (833) 876-4589
Fx: (562) 285-4141
Email: landdepartment@crimsonpl.com

Crimson Midstream, LLC

May 09, 2022

Julie Quillin,
Carlin Environmental
VIA Email

Re: C05092022C - Notice of Improvement Response Letter
FIRST UTILITY NOTICE FACILITY RESEARCH AND REQUEST FOR COMMENTS FOR CARLIN ENVIRONMENTAL

Dear Julie Quillin,

Pursuant to your request dated May 09, 2022, pertaining to the above referenced project, please be advised that Crimson Midstream, LLC maintains pipelines within the vicinity of your proposed project. We are prepared to mark our facilities upon receiving 48-hour advanced Underground Service Alert (USA) notice.

Enclosed for your information are drawings that depict the general alignment of our pipelines. Upon completion of your final project drawings, please provide us a detailed set of your plans for our review to determine if there is a conflict with any of our existing facilities.

Crimson requires a representative to be on site during any construction activities within the vicinity of our facilities. Therefore, you or your contractors are hereby notified to contact, in addition to the above referenced USA notice, Crimson's designated representative, Shenan Lovrien office: 562-285-4107, between the hours of 6:30 A.M. and 5:00 P.M., Monday through Friday, a minimum of 48 hours in advance of commencing said construction activities.

Please be advised that any and all facilities identified as "Active", "Idle", or "Abandoned", unless otherwise clearly specified, remain the property of Crimson, and that all activities affecting these facilities must be approved and controlled by Crimson. Should it be determined that said facility potentially interferes with your project this office must be notified immediately, at which time Crimson personnel will review the issues to determine what actions will be necessary to identify and resolve any conflicts.

If you have questions or require additional information regarding this submittal, please contact April C. Harvey at 562-285-4112.

Sincerely,

April C. Harvey

ROW Team Lead