



Appendix H

Phase I Environmental Site Assessment

PARTNER

Engineering and Science, Inc.



PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

Alder Logistics Center

10380 Alder Avenue
Bloomington, California 92316

December 4, 2018
Partner Project No. 18-230432.1



Prepared for:

Lake Creek Industrial
17551 Norwood Park Place
Tustin, California 92780

December 4, 2018

Mr. Michael Johnson
Lake Creek Industrial
17551 Norwood Park Place
Tustin, California 92780

Subject: Phase I Environmental Site Assessment
Alder Logistics Center
10380 Alder Avenue
Bloomington, California 92316
Partner Project Number 18-230432.1

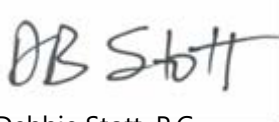
Dear Mr. Johnson:

Partner Engineering and Science, Inc. (Partner) is pleased to provide the results of the *Phase I Environmental Site Assessment* (Phase I ESA) report of the abovementioned address (the "subject property"). This assessment was performed in general conformance with the scope and limitations as detailed in the ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

The Phase I Environmental Site Assessment is designed to provide you with an assessment concerning environmental conditions (limited to those issues identified in the report) as they exist at the subject property. This assessment included a site reconnaissance as well as research and interviews with representatives of the public, property ownership, site manager, and regulatory agencies. An assessment was made, conclusions stated, and recommendations outlined.

We appreciate the opportunity to provide environmental services to you. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (310) 622-8855.

Sincerely,



Debbie Stott, P.G.
Principal

EXECUTIVE SUMMARY

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in general accordance with the scope of work and limitations of ASTM Standard Practice E1527-13, the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) for the property located at 10380 Alder Avenue, in the unincorporated community of Bloomington, San Bernardino County, California (the "subject property"). The Scope of Services performed is in accordance with the contract between Lake Creek Industrial and Partner dated October 25, 2018.

Property Description

The subject property is located on the west side of Alder Avenue, north of Slover and south of the San Bernardino Freeway within a mixed residential and commercial area of Bloomington, San Bernardino County, California. Please refer to the table below for further description of the subject property:

Subject Property Data

Address:	10380 Alder Avenue, Bloomington, California 92316
Additional Addresses:	10326, 10396, 10339, and 10360 Alder Ave
Property Use:	Commercial brining operation for vegetables
Land Acreage (Ac):	8.86 Ac 379,920 square foot
Number of Buildings:	7
Number of Floors:	1
Date of Construction:	1930s original, and 1940s to 1980s
Assessor's Parcel Number (APN):	0252-131-03, 0252-131-04, 1252-131-36, 0252-313-41, and 0252-131-43
Type of Construction:	Metal frame, wood frame
Current Tenants:	Gene Belk Briners
Zoning:	Valley Corridor/Bloomington Enterprise
Site Assessment Performed By:	Heather Hodgetts of Partner
Site Assessment Conducted On:	November 11, 2018

The subject property consists of an 8.86-acre parcel of land developed for use as a brining operation for vegetables. At the time of the site visit, the subject parcel was improved with seven buildings including a vegetable processing building (northwest corner of site); a packaging/former dicing building (northwestern portion of site); a residence (northeast corner of site); former maintenance shop and current maintenance shop (central portion of the site), and two office/storage buildings located in the eastern portion of the subject property.

Other features onsite include brining and vinegar aboveground tanks; a truck scale (east side of the site), three septic tanks with seepage pits (adjacent to the vegetable processing building, the residence and the southern office/storage building); a vehicle fueling station with an adjacent 12,000-gallon diesel/gasoline above ground storage tank (southwestern portion of the site); a closed-loop wastewater treatment area (southwestern portion of the site), and a 10,000-gallon in-ground wastewater tank. Numerous small sheds, temporary trailers, and equipment storage areas are located onsite.

It should be noted that the facility is currently subleased to a company operating as Gene Belk Briners. The southeastern portion of the subject property is currently leased to Balfor Beatty, a construction company, and used to store construction supplies including steel beams, and plastic tubing.

Partner understands that all existing improvements will be removed in preparation for the construction of a new warehouse building.

Retail quantities of cleaning supplies, equipment maintenance products (small quantities of oils, lubricants, etc.) welding equipment, and propane (for forklifts) are used and stored onsite in the maintenance shop in the central portion of the subject property. The propane was stored in a cage located on the west side of the maintenance building. The oils and lubricants are used during the maintenance/repair of onsite equipment/forklifts and during the fabrication/welding activities in the maintenance shop. A hazardous waste storage area for waste oil was located in the northwest corner of the maintenance shop. The waste drums and containers were located on a plastic secondary containment unit and removed by a licensed contractor. Hazardous materials and wastes observed at the subject property appeared to be stored properly, with no evidence of spills or leaks. According to Mr. Belk, the building located adjacent to the north of the current maintenance shop was the previous location of the maintenance shop. No evidence of spills or leaks was observed in the former maintenance shop.

The subject property has a closed-loop wastewater treatment system located on the southwestern portion of the subject property that is used to treat and store wastewater generated from washing the produce. Onsite stormwater drains located in the production areas on the northern and northeastern portions of the subject property drain to two main pipelines that direct washwater/stormwater to the wastewater treatment system. Pulp wastes are collected in the northwestern production area in an open, circular clarifier prior draining to the wastewater treatment system. The wastewater treatment system utilizes a 5,000-gallon sump, an aboveground clarifier, and aboveground oxygenation pH adjustment tanks. Treated wastewater is then discharged to a holding tank and trucked offsite to the Corona Dump Station for disposal.

Stormwater is removed from the subject property primarily by sheet flow action across the paved surfaces towards stormwater drains. Stormwater is collected and not discharged from the subject property. A main rainwater/washwater collection drain is located on the southwestern portion of the subject property, near the wastewater treatment system, and is connected to the 10,000-gallon in-ground tank. The collected stormwater is then pumped and trucked offsite to the Corona Dump Station for disposal.

No evidence of current fuel underground storage tanks (USTs) was observed during the site reconnaissance. A 10,000-gallon in-ground wastewater tank associated with the wastewater treatment system is discussed above. Three former USTs were removed from the subject property. The USTs included a 500-gallon gasoline UST, a 1,000-gallon gasoline UST, and a 10,000-gallon diesel UST that were formerly located northwest of the maintenance shop. The USTs were formerly part a vehicle fueling station. According to site personnel, the USTs were removed under the oversight of the San Bernardino County Fire Department (SBCFD). Partner has requested SBCFD records to confirm regulatory closure of USTs. SBCFD records are pending.

The facility operates a vehicle fueling station located on the southwest portion of the subject property. A 12,000-gallon diesel/gasoline aboveground storage tank (AST) and fuel dispenser was observed in the area of the fueling station. The AST is a split tank consisting of 9,000-gallon diesel and 3,000-gallon gasoline installed in August 1996. As discussed above, additional ASTs associated with the wastewater treatment system were observed in the southwestern portion of the subject property.

Three septic systems were reported on the subject property in the following locations:

- Southeast side of the vegetable processing building located on the northwest portion of subject property.
- South side of the residence located on the northeast corner of subject property.
- South side of the southern office/storage building located on the eastern portion of subject property.

Reportedly, each septic system includes a 40±-foot deep 4±-foot diameter seepage pit.

According to available historical sources, the subject property and adjacent land was agriculturally developed by 1938 and remained in agricultural use into the 1940s. A residence has been located onsite on the northeast corner of the subject property since the 1930s. The brining operations began onsite in 1940s and continues to present day. The facility historically utilized unlined and later concrete lined brine ponds onsite which were later capped. The brining operation operated under the names Gene Belk Fruit Packers (GBFP) and Gene Belk Briners.

The subject property is listed as a Land Disposal Site (LDS). According to a review of Regional Water Quality Control Board (RWQCB) documents, GBFP operation has been in the business of preparing fruits and vegetables in salt solutions since the 1940s. Prior to December of 1971, excess waters from process operations, containing organic materials and salts, were disposed to the ground in unlined surface impoundments. These unlined impoundments were designed to permit evaporation and percolation of the wastewater. In the early 1970s, this practice was discontinued and waste brines were managed by evaporation in cement lined holding ponds located mainly on the southwestern portion of the subject property under the oversight of the RWQCB.

On November 28, 1989 an inspection by the RWQCB staff revealed that an 18- inch freeboard in the ponds was not being maintained at the time of the inspection. GBFP was requested to increase the freeboard to the minimum requirement of 18 inches by January 15, 1990. Due to delays by the Santa Ana Watershed Project Authority (SAWPA) which controls permits to discharge to the sewer line, GBFP was unable to comply with request and requested an extension. On April 19, 1990 a staff inspection revealed that the ponds were maximally full, and possibly slightly overtopping the banks. The staff noted that an unlined pond on the site contained salty water. The permit was granted to discharge to the Santa Ana Regional Interceptor (SARI) line on May 16, 1990 and accordingly the ponds were pumped out.

By 1992, the ponds were not in use and were not receiving wastewater. Food processing wastewater was transported to the SARI for ultimate disposal in the ocean off of Orange County. In 1992, a RWQCB

correspondence notes that extensive soil contamination (due to salt content) due to leakage from the ponds was noted onsite and posed an ongoing threat to water quality leading the RWQCB to issue a Cleanup and Abatement Order (CAO) requiring remediation of the contaminated soils. It was noted in the documents that a few years earlier the Southern Pacific Railroad had requested an easement across the northern boundary of the subject property to lay a pipeline, from their facility, to a connection to the non-reclaimable waste line (NRWL) at Sierra Avenue, but GBFP were not allowed to connect to the pipeline. The easement is shown on the October 2018 CUP application.

By the mid-1990s, GBFP implemented changes to help reduce and eliminate the possibilities of contamination including constructing a new wastewater pipeline, improved drainage system, paving large areas of the site, shipping brine wastewater off-site to brine line, and installed a wastewater treatment system. After the old ponds were cleaned, the bottoms were cracked and the sides were folded in over the bottoms leaving the area about six feet below grade. GBFP then moved in about 10,000 cubic yards of fine dirt and decomposed granite, from a local hillside, which was leveled and packed in four-inch layers by a 25-ton, rubber-tired Caterpillar dozer. Following the demolition of the concrete pond liners, over the next few years, GBFP covered the area with 6 inches of concrete and the adjacent areas with 3 inches of asphalt and constructed a new 5,000-gallon wastewater sump and treatment system. The RWQCB conducted inspections to judge cap performance and to assess if any stormwater was discharged from the subject property.

According to RWQCB documents, salt levels under 2,000 electrical conductivity (EC) would not need to be removed. The facility was notified if they choose not to remove impacted soil the site would be closed as a landfill. It was noted in hand written memos that barrels of brine were routinely dumped on the adjacent property to the south of the ponds and the run off from the subject property had affected that property. The property to the south was contaminated with levels between 2,400 and 48,000 Millimhos per centimeter (mmhos/cm). This is the basic unit of measure of electrical conductivity in soil. BGFP was trying to acquire the property to square off the subject property.

In April 1999, GBFP reportedly completed the capping of salt-affected areas at the facility per Cleanup & Abatement Order (CAO) No. 97-64 issued by the RWQCB. On August 18, 1999, a Monitoring & Reporting Program (M&RP) No. 99-62 was adopted to replace Monitoring & Reporting Program No. 75-182. M&RP No. 99-62 required GBFP to conduct quarterly cap inspection and submit annual reports to the RWQCB.

On July 7, 2001, the deed restrictions for the capped area was recorded with San Bernardino County. In April 2003, GBFP achieved full compliance with CAO No. 97-64. On July 1, 2003, the RWQCB adopted Order No. R8-2003-0078, which rescinded CAO No. 97-64. On July 15, 2011, the RWQCB adopted Order No. R8-2011-0032, which rescinded Order No. 75-182 and M&RP No. 99-62 because the order was no longer necessary as discharge had ceased and the facility was no longer in operation. GBFP was no longer required to submit annual cap maintenance reports to the RWQCB, however, GBFP or current owner is obligated to maintain the brine pond closure cap in accordance with the recorded deed restrictions. Inspections conducted by the RWQCB on February 2, 2012, noted no violations and the cap was noted in good condition.

GBFP is required to comply with the RWQCB notification requirements (new property ownership, permit revision for brine pond cap maintenance, annual fee assessment, etc.) when there is a change in ownership. The brine pond cap shall not be modified unless and until the RWQCB's Executive Officer has been notified in writing of the nature of the modification(s) and has been given a reasonable opportunity to comment on, or reasonably approved or disapprove of the proposed modification.

The subject property is located within a mixed residential and commercial area. During the vicinity reconnaissance, Partner observed the following land use on properties in the immediate vicinity of the subject property:

Immediately Surrounding Properties

- North:** Railroad Right of Way, followed by San Bernardino Freeway.
- South:** Commercial property (17628 Slover Avenue), a single-family residence and commercial property (no addresses).
- East:** Alder Avenue, followed by single family residences (10349 and 10431 Alder Avenue), commercial properties (10395 and 10397 Alder Avenue).
- West:** Railroad Right of Way and Weyerhauser (1740 Slover Avenue).

No environmental concerns associated with adjacent properties were identified based on visual observation from publicly accessible rights-of-way.

The agency database report obtained from Environmental Data Resources, Inc. (EDR) identified the subject property as:

- **Gene Belk Fruit Packers (GBFP)/Balfor Beatty Infrastructure Inc. (EDR ID Number: A1, A2, A3, A4, A5, A6, A7, A8, A9)** at 10380 Alder Avenue, the AST, EMI, SWEEPS UST, HIST UST, WDS, HIST UST, FINDS, ECHO, HAZNET, WMUDS/SWAT (S103443301), DEED, LDS, ENF, NPDES, San Bern. Co. Permit, WDS, and CIWQS databases. The facility is classified as Industrial - Pickled Fruits and Vegetables, Vegetable Sauces and Seasonings, and Salad Dressings. This site is listed as having a 12,500-gallon AST (contents not specified), a 500-gallon unleaded gasoline UST, an 8,000-gallon premium gasoline UST (installed in 1978) and a 1,000-gallon diesel UST (installed in 1978). No unauthorized release or contamination incident associated with these tanks is reported in the database report. As discussed in Section 4.1.1, the three USTs were reportedly removed from the subject property under the oversight of the San Bernardino County Fire Department in August 1996. Partner has requested SBCFD records to confirm regulatory closure of USTs. SBCFD records are pending. This site is listed as having a continuous or seasonal discharge that is under Waste Discharge Requirements. The waste is reported as process waste. The facility is also listed as having an active NPDES permit. As discussed in Section 4.1.2, the subject property is listed as a Land Disposal Site (LDS) for capping of salt-affected areas at the facility per Cleanup & Abatement Order (CAO) No. 97-64. issued by the RWQCB. GBFP is obligated to maintain the brine pond closure cap in accordance with the recorded deed restrictions. Based on a review of the covenant document, the brine pond cap applies to an area of approximately 0.63 acres located on the southwest portion of the subject property. Three active permits issued to GBFP included: Hazardous Materials (11-30 chemicals), APSA 10,001-100,000-gallon facility capacity,

and Conditionally Exempt Small Quantity Generator. The expiration date of the permits is listed as September 30, 2018. Three inactive permits for GBFP included: RMP Inspection-Program 2, CALARP Facility Permit, and EPCRA Facility. The expiration date of the permits is listed as September 30, 2013, September 30, 2016, and September 30, 2017.

According to information obtained from the State Water Resources Control Board online database, GeoTracker, for a Circle K station at 16880 Slover Avenue located approximately 1.2 miles west, groundwater in the vicinity of the subject property is estimated to be greater than 226 feet below ground surface (bgs). Based on topographic map interpretation, groundwater is inferred to flow toward the southeast.

Findings

A *recognized environmental condition (REC)* refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. Partner did not identify recognized environmental conditions during the course of this assessment.

- Partner did not identify recognized environmental conditions during the course of this assessment.

A *controlled recognized environmental condition (CREC)* refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The following was identified during the course of this assessment:

- Partner did not identify controlled recognized environmental conditions during the course of this assessment.

A *historical recognized environmental condition (HREC)* refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The following was identified during the course of this assessment: Partner did not identify historical recognized environmental conditions during the course of this assessment.

- In August 1996, three underground storage tanks (USTs) were removed from the subject property. The USTs included a 500-gallon gasoline UST, a 1,000-gallon gasoline UST, and a 10,000-gallon diesel UST that were formerly located northwest of the maintenance shop. The USTs were formerly part a vehicle fueling station. According to site personnel, the USTs were removed under the oversight of the San Bernardino County Fire Department (SBCFD). Partner has requested SBCFD records to confirm regulatory closure of USTs. SBCFD records are pending. Based on the

regulatory closure, the former USTs will be considered a historical recognized environmental condition.

An *environmental issue* refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of this assessment:

- The subject property is listed as a Land Disposal Site (LDS) with deed restrictions. In April 1999, GBFP reportedly completed the capping of salt-affected areas at the facility per Cleanup & Abatement Order (CAO) No. 97-64 issued by the RWQCB. GBFP is obligated to maintain the brine pond closure cap in accordance with the recorded deed restrictions. Post-Closure Cover Maintenance and Monitoring –Annual Reports for the closed brine ponds and quarterly Cap Inspections are required quarterly to assess the condition of the cover. GBFP is required to comply with the RWQCB notification requirements (new property ownership, permit revision for brine pond cap maintenance, annual fee assessment, etc.) when there is a change in ownership of the property where the closed brine ponds are located. The brine pond cap shall not be modified unless and until the RWQCB's Executive Officer has been notified in writing of the nature of the modification(s) and has been given a reasonable opportunity to comment on, or reasonably approved or disapprove of, the proposed modification.
- It was noted in the RWQCB records that the brine wastewater had likely impacted adjacent properties to the south. No further documentation was available regarding how this issue was resolved.
- All hazardous materials no longer being used and hazardous wastes observed at the subject property should be removed and properly disposed of by a licensed contractor.
- Septic systems located at the subject property parcels should be removed and properly closed by a licensed contractor if no longer in use.
- A railroad spur is located on the northern boundary of the subject property. If the remaining tracks are removed and soil excavated for re-development, the presence of metals, total petroleum hydrocarbons, and polynuclear aromatic hydrocarbons in soil is possible and can be managed at that time.
- Due to the age of the subject property buildings, there is a potential that asbestos-containing material (ACM) and/or lead-based paint (LBP) are present. Suspect ACMs and chipped and peeling painted surfaces were observed at the subject property. The identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any demolition activities that would impact them to prevent potential exposure to workers. Furthermore, OSHA regulations require that contractors performing work that will impact these surfaces be informed of the presence of the lead in paint so that they can take the proper precautions when performing their work. Prior to demolition, ACMs will require abatement in accordance with local regulations.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 10380 Alder Avenue, in the unincorporated community of Bloomington, San Bernardino County, California (the "subject property"). Any exceptions to or deletions from this practice are described in Section 1.5 of this report.

This assessment has revealed evidence of a historical recognized environmental condition and environmental issues as discussed above. It is Partner's understanding that the developer will address the issues and recommendations described above.

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1.0 INTRODUCTION

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in general conformance with the scope and limitations of ASTM Standard Practice E1527-13 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) for the property located 10380 Alder Avenue, in the unincorporated community of Bloomington, San Bernardino County, California (the "subject property"). Any exceptions to, or deletions from, this scope of work are described in the report.

1.1 Purpose

The purpose of this ESA is to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E-1527-13) affecting the subject property that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the subject property or require a material change in the use thereof; 3) require clean-up, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the subject property under any applicable environmental law; 4) may affect the value of the subject property; and 5) may require specific actions to be performed with regard to such conditions and circumstances.

This ESA was performed to permit the User to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on scope of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) liability (hereinafter, the "landowner liability protections," or "LLPs"). ASTM Standard E-1527-13 constitutes "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35)(B).

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*), the *User* must provide the following information (if available) to the *environmental professional*. Failure to provide this information could result in a determination that *all appropriate inquiry* is not complete. The user is asked to provide information or knowledge of the following:

- Environmental cleanup liens that are filed or recorded against the site.
- Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry.
- Specialized knowledge or experience of the person seeking to qualify for the LLPs.
- Relationship of the purchase price to the fair market value of the *property* if it were not contaminated.
- Commonly known or *reasonably ascertainable* information about the *property*.
- The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate assessment.
- The reason for preparation of this Phase I ESA.

Fulfillment of these user responsibilities is key to qualification for the identified defenses to CERCLA liability. Partner requested our Client to provide information to satisfy User Responsibilities as identified in Section 6 of the ASTM guidance.

1.2 Scope of Work

The scope of work for this ESA is in general accordance with the requirements of ASTM Standard E 1527-13 and the contract between Lake Creek Industrial and Partner dated October 25, 2018..

This assessment included: 1) a property and adjacent site reconnaissance; 2) interviews with key personnel; 3) a review of historical sources; 4) a review of regulatory agency records; and 5) a review of a regulatory database report provided by a third-party vendor. Partner contacted local agencies, such as environmental health departments, fire departments and building departments in order to request for review records of current and/or former hazardous substances usage, storage and/or releases of hazardous substances on the subject property.

Partner researched information on the presence of activity and use limitations (AULs) at the appropriate agencies. As defined by ASTM E1527-13, AULs are the legal or physical restrictions or limitations on the use of, or access to, a site or facility: 1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil or groundwater on the subject property; or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls (IC/ECs), are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil or groundwater on the property.

If requested by Client, this report may also include the identification, discussion of, and/or limited sampling of asbestos-containing materials (ACMs), lead-based paint (LBP), microbial growth, and/or radon.

1.3 Limitations

Partner warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in the Scope of Work. These methodologies are described as representing good commercial and customary practice for conducting an ESA of a property for the purpose of identifying recognized environmental conditions. There is a possibility that even with the proper application of these methodologies there may exist on the subject property conditions that could not be identified within the scope of the assessment or which were not reasonably identifiable from the available information. Partner believes that the information obtained from the record review and the interviews concerning the subject property is reliable. However, Partner cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The conclusions and findings set forth in this report are strictly limited in time and scope to the date of the evaluations. The conclusions presented in the report are based solely on the services described therein, and not on scientific tasks or procedures beyond the scope of agreed-upon services or the time and budgeting restraints imposed by the Client. No other warranties are implied or expressed.

Some of the information provided in this report is based upon personal interviews, and research of available documents, records, and maps held by the appropriate government and private agencies. This report is subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollections of those persons contacted.

This practice does not address requirements of any state or local laws or of any federal laws other than the all appropriate inquiry provisions of the LLPs. Further, this report does not intend to address all of the safety concerns, if any, associated with the subject property.

Environmental concerns, which are beyond the scope of a Phase I ESA as defined by ASTM include the following: ACMs, LBP, radon, and lead in drinking water. These issues may affect environmental risk at the subject property and may warrant discussion and/or assessment; however, are considered non-scope issues. If specifically requested by the Client, these non-scope issues are discussed in Section 6.3.

1.4 User Reliance

Lake Creek Industrial engaged Partner to perform this assessment in accordance with an agreement governing the nature, scope and purpose of the work as well as other matters critical to the engagement. All reports, both verbal and written, are for the sole use and benefit of Lake Creek Industrial. Either verbally or in writing, third parties may come into possession of this report or all or part of the information generated as a result of this work. In the absence of a written agreement with Partner granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against Partner, its officers, employees, vendors, successors or assigns. Any such unauthorized user shall be responsible to protect, indemnify and hold Partner, Client and their respective officers, employees, vendors, successors and assigns harmless from any and all claims, damages, losses, liabilities, expenses (including reasonable attorneys' fees) and costs attributable to such Use. Unauthorized use of this report shall constitute acceptance of and commitment to these responsibilities, which shall be irrevocable and shall apply regardless of the cause of action or legal theory pled or asserted. Additional legal penalties may apply.

This report has been completed under specific Terms and Conditions relating to scope, relying parties, limitations of liability, indemnification, dispute resolution, and other factors relevant to any reliance on this report. Any parties relying on this report do so having accepted the Terms and Conditions for which this report was completed. A copy of Partner's standard Terms and Conditions can be found at <http://www.partneresi.com/terms-and-conditions.php>.

1.5 Limiting Conditions

The findings and conclusions contain all of the limitations inherent in these methodologies that are referred to in ASTM E1527-13.

Specific limitations and exceptions to this ESA are more specifically set forth below:

- Interviews with past owners, operators and occupants prior to Gene Belk Briners were not reasonably ascertainable and thus constitute a data gap. Based on information obtained from

other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment. Partner was allowed access to all areas of the property.

- An environmental cleanup lien search was not performed. However, it is Partner's opinion that the lack of the lien search does not represent a significant data gap, in that it does not impact Partner's ability to identify recognized environmental conditions at the subject property and therefore it does not alter the conclusions of this report. According to the EDR Report, NPL (Superfund) and other environmental liens are not associated with the subject property. Based on available information, no environmental liens appear to be associated with the subject property.
- Partner submitted Freedom of Information Act (FOIA) request to San Bernardino County Fire Department (SBCFD) for information pertaining to hazardous substances, underground storage tanks, releases, inspection records, etc. for the subject property and/or adjacent properties. As of this writing, this agency has not responded to Partner's request. Based on information obtained from other historical sources, this limitation is not expected to alter the overall findings of this assessment.
- Partner's view of the ground during the site assessment was obstructed due to brining tanks and equipment and construction storage areas. Based on information obtained from other historical sources, this limitation is not expected to alter the overall findings of this assessment.

2.0 SITE DESCRIPTION

2.1 Site Location and Legal Description

The subject property is located on the west side of Alder Avenue north of Slover Avenue and south of the San Bernardino Freeway within a mixed commercial and residential area of Bloomington, San Bernardino County, California. The weather at the time of the site visit was sunny and in the mid 70s (degrees Fahrenheit). Please refer to the table below for further description of the subject property:

Subject Property Data

Address:	10380 Alder Avenue, Bloomington, California 92316
Additional Addresses:	10326, 10396, 10339, and 10360 Alder Ave
Property Use:	Commercial brining operation for vegetables
Land Acreage (Ac):	8.86 Ac 379,920 square foot
Number of Buildings:	7
Number of Floors:	1
Date of Construction:	1930s original, and 1940s to 1980s
Assessor's Parcel Number (APN):	0252-131-03, 0252-131-04, 1252-131-36, 0252-313-41, and 0252-131-43
Type of Construction:	Metal frame, wood frame
Current Tenants:	Gene Belk Briners
Zoning:	Valley Corridor/Bloomington Enterprise
Site Assessment Performed By:	Heather Hodgetts of Partner
Site Assessment Conducted On:	November 7, 2018

Please refer to Figure 1: Site Location Map, Figure 2: Site Plan, Figure 3: Topographic Map, and Appendix A: Site Photographs for the location and site characteristics of the subject property.

2.2 Current Property Use

The subject property consists of an 8.86-acre parcel of land developed for use as a brining operation for vegetables. At the time of the site visit, the subject parcel was improved with seven buildings including a vegetable processing building (northwest corner of site); a packaging/former dicing building (northwestern portion of site); a residence (northeast corner of site); former maintenance shop and current maintenance shop (central portion of the site), and two office/storage buildings located in the eastern portion of the subject property.

Other features onsite include brining and vinegar aboveground tanks; a truck scale (east side of the site), three septic tanks with seepage pits (adjacent to the vegetable processing building, the residence and the southern office/storage building); a vehicle fueling station with an adjacent 12,000-gallon diesel/gasoline above ground storage tank (southwestern portion of the site); a closed-loop wastewater treatment area (southwestern portion of the site), and a 10,000-gallon in-ground wastewater tank. Numerous small sheds, temporary trailers, and equipment storage areas are located onsite.

It should be noted that the facility is currently subleased to a company operating as Gene Belk Briners. The southeastern portion of the subject property is currently leased to Balfor Beatty, a construction company, and used to store construction supplies including steel beams, and plastic tubing.

Partner understands that all existing improvements will be removed in preparation for the construction of a new warehouse building.

2.3 Current Use of Adjacent Properties

The subject property is located within a mixed commercial and residential area. During the vicinity reconnaissance, Partner observed the following land use on properties in the immediate vicinity of the subject property:

Immediately Surrounding Properties

- North:** Railroad Right of Way, followed by San Bernardino Freeway.
South: Commercial property (17628 Slover Avenue), a single-family residence and commercial property (no addresses).
East: Alder Avenue, followed by single family residences (10349 and 10431 Alder Avenue), commercial properties (10395 and 10397 Alder Avenue).
West: Railroad Right of Way and Weyerhauser (1740 Slover Avenue).

No environmental concerns associated with adjacent properties were identified based on visual observation from publicly accessible rights-of-way.

2.4 Physical Setting Sources

2.4.1 Topography

Topographic map coverage is provided by the U.S. Geological Survey (USGS), 7.5-minute "Fontana, California" quadrangle map dated 2012. The subject property lies at an approximate elevation of 1,096 feet above mean sea level (msl) with a local topographic gradient toward the south.

A copy of the most recent topographic map is included as Figure 3.

2.4.2 Hydrology

According to information obtained from the State Water Resources Control Board online database, GeoTracker, for a Circle K station at 16880 Slover Avenue located approximately 1.2 miles west, groundwater in the vicinity of the subject property is estimated to be greater than 226 feet below ground surface (bgs). Based on topographic map interpretation, groundwater is inferred to flow toward the southeast.

The nearest surface water is the Santa Ana River, located approximately 4 miles to the southeast. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed on the subject property during this assessment.

2.4.3 Geology/Soils

The site is located in the Peninsular Ranges geomorphic province. The Peninsular Ranges are a northwest-southwest oriented complex of blocks separated by similarly trending faults. They extend from the Transverse Ranges and the Los Angeles Basin south to the Mexican border and beyond to the tip of Baja California and are bounded on the east by the Colorado Desert and the Gulf of California. The Peninsular Ranges contain minor Jurassic and extensive Cretaceous igneous rocks associated with the

Nevadan plutonism. Marine Cretaceous sedimentary rocks are well represented and post-Cretaceous rocks form a restricted veneer of volcanic, marine, and nonmarine sediments.

Soil was described by Southern California Geotechnical (SCG – Updated Geotechnical Investigation, Proposed Alder Logistics Center, 10336 Alder Ave, San Bernardino County, California, November 15, 2018) as artificial fill soils to depths of 1½ to 4½± feet below the existing site grades. The fill soils generally consist of loose to medium dense silty fine sands and medium to coarse sands, with varying fine to coarse gravel content and occasional cobbles. Native alluvial soils were encountered below the fill soils at all of the boring locations, extending to the maximum depth explored of 20± feet below the existing site grades. The alluvial soils generally consist of medium dense to very dense silty fine to medium sands, gravelly fine to coarse sands, fine to coarse sandy gravel, and fine sandy silts, with occasional to extensive cobbles.

2.4.4 Flood Zone Information

Partner performed a review of the Flood Insurance Rate Map, published by the Federal Emergency Management Agency. According to Community Panel Number 06071C8658H, dated August 28, 2008, the subject property appears to be located in Zone X, an area located outside of the 100-year and 500-year flood plains.

3.0 HISTORICAL INFORMATION

Partner obtained historical use information about the subject property from a variety of sources. Information regarding past land use was obtained by a review of historical aerial photographs, historical Sanborn Fire Insurance maps, city directories, historical topographic maps, and previous reports of the subject property and surrounding area obtained from Environmental Data Resources (EDR). Copies of the historical resources are included in Appendix B. EDR reported that Sanborn™ Fire Insurance Maps were not available for the subject property. A chronological listing of the historical data found is summarized in the table below.

Date	Scale or Address	Source	Summary
1896, 1898, 1901	1:250,000; 1:62,5000	Topographic Map	The subject property and immediately surrounding area are depicted as vacant land located to the south of the Southern Pacific Railroad. Various improved roads and railroad lines are shown throughout the surrounding area. No structures are depicted on the subject property.
1938, 1948, 1953, 1959, 1967, 1975	1"=500'	Aerial Photograph	<p>The subject property and adjacent properties appear to be agriculturally developed land (orchards). Alder Avenue is visible to the east. A residence appears to be located on the eastern portion of the property adjacent to Alder Avenue. The railroad line is visible adjacent to the north.</p> <p>By 1948, the majority of the orchards are no longer present. Adjacent parcels are agricultural with residences. By 1948 a highway is present north of the railroad.</p> <p>By 1959, the central portion of the property is developed with numerous small structures. The majority of the land is vacant. The residence appears to remain in the northeast corner.</p> <p>Land to the south and east is residential. Land to the west is vacant. A vacant parcel is located to the north between the subject property and</p>

Date	Scale or Address	Source	Summary
			<p>the railroad.</p> <p>By 1967, numerous small buildings are located onsite. The western portion remained vacant. No changes to the vicinity.</p> <p>By 1975, small buildings are visible across the entire property. Land to the west remained vacant. No changes to the vicinity.</p>
1942, 1943, 1953, 1954	1:24,000; 1:31,680	Topographic map	The subject property is depicted as developed with a small structure (residence) in the northeast corner. By 1954, three small structures were depicted. The remainder of the subject property appears to be vacant land. Surrounding areas are depicted with agriculturally developed land and scattered residential properties.
1965, 1975, 1980, 1985, 1992, 1995, 2005, 2010	10380 Alder Ave	City Directories	Belk, Gene F, Belk Curtis E, Belk Gene Fruit Packer
1967, 1973, 1980	1:24,000; 1:31,680	Topographic map	The subject property is depicted as developed with several small structures on the southern and northwestern portion of the subject property. The remainder of the subject property is depicted as vacant land. Surrounding areas are depicted as developed with small structures or vacant land.
1985, 1990, 1994	1"=500'	Aerial Photograph	<p>The subject property appears to be developed with numerous small structures. A barn like rectangular building is present near the northwest corner. Square shaped dark areas are visible along the southwest border.</p> <p>Two small buildings are visible adjacent to the northwest. Most of the land to the west is vacant. The railroad remains to the north with the freeway beyond. Alder Avenue is located</p>

Date	Scale or Address	Source	Summary
			east with residential and commercial properties beyond. Land to the south appears residential.
2005	1"=500'	Aerial Photograph	<p>No changes to the subject property.</p> <p>A railroad spur is present to the west leading to a building adjacent to the southwest.</p> <p>The railroad remains to the north with freeway beyond. Land across Alder Avenue to the east is a mix of commercial and residential. A residence remains to the south.</p>
2009, 2012	1"=500'	Aerial Photograph	The subject property appears to be developed with the current buildings as seen during the site visit. Adjacent properties and the surrounding areas appear developed with residential and commercial properties.

According to available historical sources, the subject property and adjacent land was agriculturally developed by 1938 and remained in agricultural use into the 1940s. A residence has been located onsite on the northeast corner of the subject property since the 1930s. The brining operations began onsite in 1940s and continues to present day. The facility historically utilized unlined and later concrete lined brine ponds onsite which were later capped. The brining operation operated under the names Gene Belk Fruit Packers (GBFP) and Gene Belk Briners.

Common agricultural practices can result in residual concentrations of fertilizers, pesticides or herbicides in near-surface soil, though not generally at concentrations that pose a significant health risk. It is Partner's opinion that, since the site has been graded, redeveloped, and paved, remaining pesticide or herbicide residues, if any, are likely to have been dispersed during these construction activities and therefore are unlikely to impact human health or the environment. Accordingly, no further investigation is recommended regarding potential residual pesticides.

4.0 REGULATORY RECORDS REVIEW

4.1 Regulatory Agencies

4.1.1 County Fire Department

Regulatory Agency Data

Name of Agency:	San Bernardino County Fire Department (SBCFD), Hazardous Materials Division (HMD)
Point of Contact:	Records Coordinator
Agency Address:	620 South E Street, San Bernardino, CA 92415
Agency Phone Number:	(909) 386-8468
Date of Contact:	November 8, 2018
Method of Communication:	Faxed Request
Summary of Communication:	

As of the date of this report, Partner has not received a response from the SBCFD for inclusion in this report.

According to Mr. Curtis Belk, the property owner, three underground storage tanks (USTs) were removed from the subject property under the oversight of the San Bernardino County Fire Department in August 1996. The USTs included a 500-gallon gasoline UST, a 1,000-gallon gasoline UST, and a 10,000-gallon diesel UST that were formerly located northwest of the maintenance shop. The USTs were formerly part a vehicle fueling station. Partner has requested SBCFD records to confirm regulatory closure of USTs. SBCFD records are pending. Based on the regulatory closure, the former USTs will be considered a historical recognized environmental condition.

4.1.2 Regional Water Quality Agency

Regulatory Agency Data

Name of Agency:	Regional Water Quality Control Board (RWQCB)
Point of Contact:	https://geotracker.waterboards.ca.gov/
Agency Address:	3737 Main Street, Suite 500, Riverside, California 92501
Agency Phone Number:	(951)781-4499
Date of Contact:	November 8, 2018
Method of Communication:	Online Database Query and Records Request
Summary of Communication:	

The subject property address (10380 Alder Avenue) was identified on the RWQCB GeoTracker online database as Brine Facility, Gene Belk Bloomington -Closed (Land Use Restrictions).

According to the GeoTracker database and the EDR Database Report (Section 4.2.2), the subject property is listed as a Land Disposal Site (LDS). According to reviewed documents:

- The subject property is listed as a Land Disposal Site (LDS). According to a review of Regional Water Quality Control Board (RWQCB) documents, GBFP operation has been in the business of preparing fruits and vegetables in salt solutions since the 1940s.

- Prior to December of 1971, excess waters from process operations, containing organic materials and salts, were disposed to the ground in unlined surface impoundments. These unlined impoundments were designed to permit evaporation and percolation of the wastewater. In the early 1970s, this practice was discontinued and waste brines were managed by evaporation in cement lined holding ponds located mainly on the southwestern portion of the subject property under the oversight of the RWQCB.
- On November 28, 1989 an inspection by the RWQCB staff revealed that an 18- inch freeboard in the ponds was not being maintained at the time of the inspection. GBFP was requested to increase the freeboard to the minimum requirement of 18 inches by January 15, 1990. Due to delays by the Santa Ana Watershed Project Authority (SAWPA) which controls permits to discharge to the sewer line, GBFP was unable to comply with request and requested an extension. On April 19, 1990 a staff inspection revealed that the ponds were maximally full, and possibly slightly overtopping the banks. The staff noted that an unlined pond on the site contained salty water. The permit was granted to discharge to the Santa Ana Regional Interceptor (SARI) line on May 16, 1990 and accordingly the ponds were pumped out.
- By 1992, the ponds were not in use and were not receiving wastewater. Food processing wastewater was transported to the SARI for ultimate disposal in the ocean off of Orange County. In 1992, a RWQCB correspondence notes that extensive soil contamination (due to salt content) due to leakage from the ponds was noted onsite and posed an ongoing threat to water quality leading the RWQCB to issue a Cleanup and Abatement Order (CAO) requiring remediation of the contaminated soils. It was noted in the documents that a few years earlier the Southern Pacific Railroad had requested an easement across the northern boundary of the subject property to lay a pipeline, from their facility, to a connection to the non-reclaimable waste line (NRWL) at Sierra Avenue, but GBFP were not allowed to connect to the pipeline. The easement is shown on the October 2018 CUP application.
- By the mid-1990s, GBFP implemented changes to help reduce and eliminate the possibilities of contamination including constructing a new wastewater pipeline, improved drainage system, paving large areas of the site, shipping brine wastewater off-site to brine line, and installed a wastewater treatment system. After the old ponds were cleaned, the bottoms were cracked and the sides were folded in over the bottoms leaving the area about six feet below grade. GBFP then moved in about 10,000 cubic yards of fine dirt and decomposed granite, from a local hillside, which was leveled and packed in four-inch layers by a 25-ton, rubber-tired Caterpillar dozer. Following the demolition of the concrete pond liners, over the next few years, GBFP covered the area with 6 inches of concrete and the adjacent areas with 3 inches of asphalt and constructed a new 5,000-gallon wastewater sump and treatment system. The RWQCB conducted inspections to judge cap performance and to assess if any stormwater was discharged from the subject property.
- According to RWQCB documents, salt levels under 2,000 electrical conductivity (EC) would not need to be removed. The facility was notified if they choose not to remove impacted soil the site would be closed as a landfill. It was noted in hand written memos that barrels of brine were

routinely dumped on the adjacent property to the south of the ponds and the run off from the subject property had affected that property. The property to the south was contaminated with levels between 2,400 and 48,000 Millimhos per centimeter (mmhos/cm). This is the basic unit of measure of electrical conductivity in soil. GBFP was trying to acquire the property to square off the subject property.

- In April 1999, GBFP reportedly completed the capping of salt-affected areas at the facility per Cleanup & Abatement Order (CAO) No. 97-64 issued by the RWQCB. On August 18, 1999, a Monitoring & Reporting Program (M&RP) No. 99-62 was adopted to replace Monitoring & Reporting Program No. 75-182. M&RP No. 99-62 required GBFP to conduct quarterly cap inspection and submit annual reports to the RWQCB.
- On July 7, 2001, the deed restrictions for the capped area was recorded with San Bernardino County. In April 2003, GBFP achieved full compliance with CAO No. 97-64. On July 1, 2003, the RWQCB adopted Order No. R8-2003-0078, which rescinded CAO No. 97-64. On July 15, 2011, the RWQCB adopted Order No. R8-2011-0032, which rescinded Order No. 75-182 and M&RP No. 99-62 because the order was no longer necessary as discharge had ceased and the facility was no longer in operation. GBFP was no longer required to submit annual cap maintenance reports to the RWQCB, however, GBFP or current owner is obligated to maintain the brine pond closure cap in accordance with the recorded deed restrictions. Inspections conducted by the RWQCB on February 2, 2012, noted no violations and the cap was noted in good condition.
- GBFP is required to comply with the RWQCB notification requirements (new property ownership, permit revision for brine pond cap maintenance, annual fee assessment, etc.) when there is a change in ownership. The brine pond cap shall not be modified unless and until the RWQCB's Executive Officer has been notified in writing of the nature of the modification(s) and has been given a reasonable opportunity to comment on, or reasonably approved or disapprove of the proposed modification.

4.1.3 Air Pollution Control Agency

Regulatory Agency Data

Name of Agency:	South Coast Air Quality Management District (AQMD)
Point of Contact:	http://www.aqmd.gov/home/tools/public/find
Agency Address:	21865 Copley Drive, Diamond Bar, California 91765
Agency Phone Number:	(909) 396-2000
Date of Contact:	November 8, 2018
Method of Communication:	Online Database Query
Summary of Communication:	

Partner researched the South Coast Air Quality Management District (SCAQMD) online database for information regarding any Permits to Operate (PTO), Notices of Violation (NOV), or Notices to Comply (NTC) records for the subject property related to air emission equipment.

The following records were found for the subject property address:

Facility ID	Facility Name/Address	Status	Equipment Listed	NOVs/NTC
25933	Gene Belk Fruit Packers/10380 Alder Avenue	Inactive	Inactive permits are listed for serv stat storage & dispensing gasoline, amine (or DEA) regeneration, sulfur dioxide production, and abrasive blasting (open). The permits were issued in 1983, 1986, 1987, 1998.	Two NOVs were issued in 1997 and 1998 for failing to apply for AST with two compartments and failing to comply with 1997 NOV. The status of the violations is shown as closed case. One NTCs were issued in 2001 for failing to submit permit for coating equipment. The facility is shown as in compliance.

No other PTOs, NOVs, NTCs or the presence of AULs were on file for the subject property with the SCAQMD.

4.1.5 Department of Toxic Substances Control

Regulatory Agency Data

Name of Agency: California Department of Toxic Substances Control (DTSC)
Point of Contact: <https://www.envirostor.dtsc.ca.gov/public/> and <http://hwts.dtsc.ca.gov/>
Agency Address: 1001 I Street, Sacramento, California 95814
Agency Phone Number: (800) 728-6942
Date of Contact: November 8, 2018
Method of Communication: Online Database Query and Records Request
Summary of Communication:

The subject property was not identified in the online DTSC Envirostor database.

The subject property was identified in the online Hazardous Waste Tracking System database.

ID Number	Facility Name/Address	Status	Inactive Date	Waste
CAC002932314	Gene Belk Fruit Packers/10380 Alder Avenue	Inactive	January 1, 2018	No hazardous wastes were listed.
CAL000115254	Gene Belk Fruit Packers, Gene Belk Briners/ 10380 Alder	Inactive	June 30, 2016	The facility was listed as a generator of the following hazardous waste in 2011 and

ID Number	Facility Name/Address	Status	Inactive Date	Waste
	Avenue			2015: "waste oil and mixed oil, silver."

4.1.7 Oil & Gas Exploration

Regulatory Agency Data

Name of Agency:	California Division of Oil, Gas and Geothermal Resources (DOGGR)
Point of Contact:	http://www.conservation.ca.gov/dog/Pages/Wellfinder.aspx
Agency Address:	801 K Street, MS 24-01, Sacramento, CA 95814
Agency Phone Number:	(916) 322-1080
Date of Contact:	November 8, 2018
Method of Communication:	Online Query
Summary of Communication:	

According to DOGGR, no oil or gas wells are located on or adjacent to the subject property.

Copies of pertinent documents obtained by Partner from the above-referenced agencies are included in Appendix B.

4.2 Mapped Database Records Search

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources, Inc. (EDR). Data from governmental agency lists are updated and integrated into one database, which is updated as these data are released. The information contained in this report was compiled from publicly available sources and the locations of the sites are plotted utilizing a geographic information system, which geocodes the site addresses. The accuracy of the geocoded locations is approximately +/-300 feet. Using the ASTM definition of migration, Partner considers the migration of hazardous substances or petroleum products in any form onto the subject property during the evaluation of each site listed on the radius report, which includes solid, liquid, and vapor. A copy of the EDR report is included as **Appendix C**.

4.2.1 Regulatory Database Summary

Radius Report Data

Database	Search Radius (mile)	Subject Property	Adjacent Properties	Sites of Concern
Federal NPL or Delisted NPL Site	1.00	N	N	N
SEMS	0.50	N	N	N
SEMS Archive	0.50	N	N	N
Federal RCRA CORRACTS Facility	1.00	N	N	N
Federal RCRA TSDF Facility	0.50	N	N	N
Federal RCRA Generators Site (LQG, SQG, CESQG)	0.25	N	Y	N
Federal IC/EC Registries	0.50	N	N	N

Federal ERNS Site	Subject Property	N	N	N
State/Tribal Equivalent NPL	1.00	N	N	N
State/Tribal Equivalent CERCLIS	1.00	N	N	N
State/Tribal Landfill/Solid Waste Disposal Site	0.50	N	N	N
State/Tribal Leaking Storage Tank Site	0.50	N	N	N
State/Tribal Registered Storage Tank Sites (UST/AST)	0.25	Y	Y	N
State/Tribal Voluntary Cleanup Sites (VCP)	0.50	N	N	N
State/Tribal Spills	0.50	N	N	N
Federal Brownfield Sites	0.50	N	N	N
State Brownfield Sites	0.50	N	N	N
San Bernardino County Permit	Subject Property	Y	Y	
HAZNET	Subject Property	Y	N	
DEED	Subject Property	Y	Y	
EDR MGP	Varies	N	N	N
EDR US Hist Auto Station	Varies	N	Y	N
EDR US Hist Cleaners	Varies	N	N	N

4.2.2 Subject Property

The agency database report obtained from Environmental Data Resources, Inc. (EDR) identified the subject property as:

- Gene Belk Fruit Packers (GBFP)/Balfor Beatty Infrastructure Inc. (EDR ID Number: A1, A2, A3, A4, A5, A6, A7, A8, A9)** at 10380 Alder Avenue, the AST, EMI, SWEEPS UST, HIST UST, WDS, HIST UST, FINDS, ECHO, HAZNET, WMUDS/SWAT (S103443301), DEED, LDS, ENF, NPDES, San Bern. Co. Permit, WDS, and CIWQS databases. The facility is classified as Industrial - Pickled Fruits and Vegetables, Vegetable Sauces and Seasonings, and Salad Dressings. This site is listed as having a 12,500-gallon AST (contents not specified), a 500-gallon unleaded gasoline UST, an 8,000-gallon premium gasoline UST (installed in 1978) and a 1,000-gallon diesel UST (installed in 1978). No unauthorized release or contamination incident associated with these tanks is reported in the database report. As discussed in Section 4.1.1, the three USTs were reportedly removed from the subject property under the oversight of the San Bernardino County Fire Department in August 1996. Partner has requested SBCFD records to confirm regulatory closure of USTs. SBCFD records are pending.

This site is listed as having a continuous or seasonal discharge that is under Waste Discharge Requirements. The waste is reported as process waste. The facility is also listed as having an active NPDES permit. As discussed in Section 4.1.2, the subject property is listed as a Land Disposal Site (LDS) for capping of salt-affected areas at the facility per Cleanup & Abatement Order (CAO) No. 97-64. issued by the RWQCB. GBFP is obligated to maintain the brine pond

closure cap in accordance with the recorded deed restrictions. Based on a review of the covenant document, the brine pond cap applies to an area of approximately 0.63 acres located on the southwest portion of the subject property.

Three active permits issued to GBFP included: Hazardous Materials (11-30 chemicals), APSA 10,001-100,000-gallon facility capacity, and Conditionally Exempt Small Quantity Generator. The expiration date of the permits is listed as September 30, 2018. Three inactive permits for GBFP included: RMP Inspection-Program 2, CALARP Facility Permit, and EPCRA Facility. The expiration date of the permits is listed as September 30, 2013, September 30, 2016, and September 30, 2017.

4.2.3 Adjacent Properties

The EDR Report identified the following facilities adjacent to the subject property:

- **California Greenwaste, Biomass-Bloomington (closed) (EDR Map ID: 11)**, is listed at 10397 Alder Avenue, adjacent to the east and hydrologically cross-gradient of the subject property. The facility is identified as a Land Disposal Site (completed-case closed in September 5, 1995) and an inactive San Bern. Co. Permit facility (HAZMAT HANDLER- 0-10 employees). No other pertinent information is given. This listing is not an indication of a hazardous materials release to the subsurface. The site is situated cross- to down-gradient of the subject property. Based on the regulatory status, depth to groundwater, and groundwater flow direction, this facility is not expected to represent an environmental concern for the subject property.
- **Solvay Fluorides, LLC/Union Pacific Railroad Company (EDR Map ID:)**, is listed at 10300 Alder Avenue, adjacent to the north and hydrologically up-gradient of the subject property. The facility is identified in the RCRA-LQG database. No RCRA violations were listed. The waste is listed as hydrofluoric acid. Based on the regulatory status, this listing appears unlikely to have created an environmental concern for the subject property.
- **Cascade Warehouse Company (EDR Map ID: B13)**, is listed at 17628 Slover Avenue, adjacent to the south and hydrologically down-gradient of the subject property. The facility is identified in the San Bernardino County database. The San Bernardino County Permit database identified the facility as having an active permit for Hazardous Materials (4-10 chemicals special). The permits expires on March 31, 2019. Based on the regulatory status, this listing appears unlikely to have created an environmental concern for the subject property.
- **Polos Complete Auto (EDR Map ID: B5)**, is listed at 17400 Slover Avenue, adjacent to the west-southwest and hydrologically cross-to down-gradient of the subject property. The facility is identified in the San Bernardino County, HIST UST, SWEEPS UST, and CA FID UST databases. Two USTs are identified at the facility. The San Bernardino County Permit database identified the facility as having an active permit for Hazardous Materials (1-3 chemicals special). The permits expired on November 30, 2017. Based on the regulatory status, this listing appears unlikely to have created an environmental concern for the subject property.

Based on the findings, vapor migration is not expected to represent a significant environmental concern at this time.

4.2.4 Site Vicinity

Partner reviewed the EDR database report to identify offsite facilities that have suspected or documented environmental concerns or RECs that may negatively impact the subject property. Partner's criteria for further evaluating the potential impact of a listed offsite facility are summarized below:

- The listed offsite facility is documented or assumed to be hydrogeologically up-gradient and a likely pathway exists for known releases of environmentally mobile contaminants to reach the subject property; or, contaminants from the listed offsite facility can reach the subject through other pathways (i.e., surface runoff); and,
- The offsite facility is listed as an open case on one of the following databases: Federal NPL, Federal CORRACTS, Federal CERCLIS, Federal ERNS, and State-Specific lists including, but not limited to State Hazardous Waste Sites, State SCL, State LUST, State Deed Restrictions, State Toxic Pits, Landfill (excluding transfer stations); or
- The facility is a known or suspected concern based on Partner's experience or observations made during the site reconnaissance. (i.e., Dry-cleaning operations that may or may not be listed as RCRA-SQG or a non-adjacent UST site that appears to have a remediation system in place).

Partner did not identify facilities that, using the criteria discussed above, appeared to be a potential concern.

4.2.5 Unmapped Sites

Partner reviewed EDR's Orphan Summary, which is a listing of sites that have not been geocoded based on lack of sufficient data regarding their exact location within the general area. The subject property was not identified as an Unmapped Site.

No orphan listings were identified.

4.3 Vapor Encroachment Screening

Partner reviewed the environmental database records identified in the EDR Radius Report and evaluated each reported site relative to a subsurface vapor encroachment condition, respective a known release, the chemicals of concern, the distance that contaminants are likely to migrate based on local geological and hydrological conditions, sub-grade utility corridors and preferential pathways, structural components, mitigation devices, and other reasonable factors.

The subsurface vapor encroachment screening was completed in general conformance with ASTM International Designation: E2600-15: *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions* ("ASTM Guide E2600-15") using Tier 1 Screening procedures. In addition, based on the inferred or known groundwater gradient as specified within this Report, Partner adopted and implemented a reduced/adjusted default area of concern ("critical distance") as calculated,

suggested and published by Buonicore, A. J., *A Smaller Intrusion*, Pollution Engineering, p26-31, May, 2009. Limiting conditions, ASTM deviations, and significant gaps, if any, are discussed in **Sections 1.0**.

4.3.1 On-Site Sources for a Vapor Encroachment Condition

Based on a review of previous reports, agency records, and current site observations, on-site sources with the potential to create a subsurface vapor encroachment concern to the subject property and its receptors were not identified. As such, a subsurface vapor encroachment condition on the subject property relative to an on-site contaminant source does not exist.

4.3.2 Off-Site Sources for a Vapor Encroachment Condition

Based on Partner's review of the Radius Report, no off-site properties with the potential to create a subsurface vapor encroachment concern to the subject property and its receptors were identified. No off-site properties with a documented open release of petroleum hydrocarbons were identified within the critical distance - 30 feet up-gradient, cross-gradient, or down-gradient of the subject property in the Radius Report. No off-site properties with a documented release of other contaminants of concern such chlorinated volatile organic hydrocarbons were identified within the critical distance - 100 feet up-gradient, cross-gradient, or down-gradient of the subject property in the Radius Report.

Based on the physical setting of the subject property and the findings from historical and regulatory records review, an off-site source for a subsurface vapor encroachment condition was not identified in association with the subject property. As such, a subsurface vapor encroachment condition on the subject property relative to off-site contaminant source does not exist.

5.0 USER PROVIDED INFORMATION AND INTERVIEWS

In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the Brownfields Amendments), the User must provide the following information (if available) to the environmental professional. Failure to provide this information could result in a determination that all appropriate inquiry is not complete. The user is asked to provide information or knowledge of the following:

- Environmental cleanup liens that are filed or recorded against the site.
- Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry.
- Specialized knowledge or experience of the person seeking to qualify for the LLPs.
- Relationship of the purchase price to the fair market value of the *property* if it were not contaminated.
- Commonly known or *reasonably ascertainable* information about the *property*.
- The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate assessment.
- The reason for preparation of this Phase I ESA.

Fulfillment of these user responsibilities is key to qualification for the identified defenses to CERCLA liability. Partner requested our Client to provide information to satisfy User Responsibilities as identified in Section 6 of the ASTM guidance.

5.1 Interviews

5.1.1 Interview with Owner

Mr. Curtis Belk, the subject property owner, was not aware of any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

According to Mr. Belk, the subject property has been in his family for at least 40 years. His father operated Gene Belk Briners/Fruit Packers on the subject property since that time. Prior to that, the subject property was developed with a residence (with a septic tank) located on the northeastern portion of the subject property. Mr. Belk further stated that three USTS were removed from the subject property in 1996 under the oversight of the SBCFD. Other information provided by Mr. Belk is incorporated into Section 6.0.

5.1.2 Interview with Report User

Please refer to Section 5.2 below for information requested from the Report User. Because the Report User is a buyer, it is understood that the Report User would not have knowledge of the property that

would significantly impact our ability to satisfy the objectives of this assessment. The lack of this information is not considered to represent a significant data gap.

5.1.3 Interview with Key Site Manager

Refer to Section 5.1.1.

5.1.4 Interviews with Past Owners, Operators and Occupants

Interviews with past owners, operators and occupants were not conducted since information regarding the potential for contamination at the subject property was obtained from other sources.

5.1.5 Interview with Others

As the subject property is not an abandoned property as defined in ASTM 1527-13, interview with others were not performed.

5.2 User Provided Information

5.2.1 Title Records, Environmental Liens, and AULs

Partner was not provided with title records or environmental lien and AUL information for review as part of this assessment.

5.2.2 Specialized Knowledge

The User did not have specialized knowledge of environmental conditions associated with the subject property at the time of the assessment.

5.2.3 Actual Knowledge of the User

The User was not aware of environmental liens and/or AULs encumbering the subject property or in connection with the subject property at the time of the assessment.

5.2.4 Valuation Reduction for Environmental Issues

The User was not aware of any reductions in property value due to environmental issues.

5.2.5 Commonly Known or Reasonably Ascertainable Information

The User did not provide information that is commonly known or *reasonably ascertainable* within the local community about the subject property at the time of the assessment.

5.2.6 Previous Reports and Other Provided Documentation

No previous reports or other pertinent documentation was provided to Partner for review during the course of this assessment.

6.0 SITE RECONNAISSANCE

The weather at the time of the site visit was sunny and clear. Refer to Section 1.5 for limitations encountered during the field reconnaissance and Sections 2.1 and 2.2 for subject property operations. The table below provides the site assessment details:

Site Assessment Data

Site Assessment Performed By: Heather Hodgetts
Site Assessment Conducted On: November 7, 2018

The table below provides the subject property personnel interviewed during the field reconnaissance:

Site Visit Personnel for 10380 Alder Avenue (Subject Property)

Name	Title/Role	Contact Number	Site Walk* Yes/No
Mr. Curtis Belk	Property Owner	951-295-1576	Yes

* Accompanied Partner during the field reconnaissance activities and provided information pertaining to the current operations and maintenance of the subject property.

6.1 General Site Characteristics

6.1.1 Solid Waste Disposal

Solid waste generated at the subject property is disposed in a commercial dumpster located on the west side of the maintenance building. An independent solid waste disposal contractor, EDCO Disposal Services, removes solid waste from the subject property. Solid waste generated at the subject property includes office and food waste. Food waste is stored in the food waste storage area located to the north of the wastewater treatment system. No evidence of illegal dumping of solid waste was observed during the Partner site reconnaissance. No further investigation or corrective actions are warranted.

6.1.2 Sewage Discharge and Disposal

Sanitary discharges on the subject property are directed into three onsite septic tanks, as further discussed in Section 6.1.7. The subject property is not connected to the municipal sanitary sewer system.

6.1.3 Surface Water Drainage

Stormwater is removed from the subject property primarily by sheet flow action across the paved surfaces toward stormwater drains. Stormwater is collected and not discharged from the subject property. A main rainwater/washwater collection drain is located on the southwestern portion of the subject property, near the wastewater treatment system, and is connected to the 10,000-gallon in-ground tank. The collected stormwater is then pumped and trucked offsite to the Corona Dump Station for disposal.

The subject property does not appear to be a designated wetland area, based on information obtained from the United States Department of Agriculture. A comprehensive wetlands survey would be required in order to formally determine actual wetlands on the subject property. No surface impoundments,

wetlands, natural catch basins, settling ponds, or lagoons are located on the subject property. No drywells were identified on the subject property.

6.1.4 Source of Heating and Cooling

Heating and cooling systems as well as domestic hot water equipment are fueled by electricity and natural gas is provided by Southern California Edison (SCE) and the Southern California Gas Company.

6.1.5 Wells and Cisterns

No aboveground evidence of wells or cisterns was observed during the site reconnaissance.

6.1.6 Wastewater

Domestic wastewater generated at the subject property is disposed by means of the septic systems (See Section 6.1.7).

As discussed in Section 4.1.2, the subject property has a closed-loop wastewater treatment system located on the southwestern portion of the subject property that is used to treat and store wastewater from processing produce. Onsite stormwater drains located in the production areas on the northern and northeastern portions of the subject property drain to two main pipelines that direct washwater/stormwater to the wastewater treatment system. Pulp wastes are collected in the northwestern production area in an open, circular clarifier prior draining to the wastewater treatment system. The wastewater treatment system utilizes a 5,000-gallon sump, an aboveground clarifier, and aboveground oxygenation pH adjustment tanks. Treated wastewater is then discharged to the 10,000-gallon in ground holding tank mentioned above in Section 6.1.3 and trucked offsite to the Corona Dump Station for disposal.

6.1.7 Septic Systems

Three septic systems were reported on the subject property in the following locations:

- Southeast side of the vegetable processing building located on the northwest portion of subject property.
- South side of the residence located on the northeast corner of subject property.
- South side of the southern office/storage building located on the eastern portion of subject property.

Reportedly, each septic system includes a 40±-foot deep 4±-foot diameter seepage pit.

6.1.8 Additional Site Observations

A railroad spur is located on the northern boundary of the subject property. According to Mr. Belk, the rail spur has not been in use since the mid-1990s.

No other additional general site characteristics were observed during the site reconnaissance.

6.2 Potential Environmental Hazards

6.2.1 Hazardous Substances and Petroleum Products Used or Stored at the Site

Retail quantities of cleaning supplies, equipment maintenance products (small quantities of oils, lubricants, etc.) welding equipment, and propane (for forklifts) are used and stored onsite in the maintenance shop in the central portion of the subject property. The propane was stored in a cage located on the west side of the maintenance building. The oils and lubricants are used during the maintenance/repair of onsite equipment/forklifts and during the fabrication/welding activities in the maintenance shop.

A hazardous waste storage area was located in the northwest corner of the maintenance shop. The waste drums and containers containing waste oil were located on a plastic secondary containment unit and removed by a licensed contractor. Hazardous materials and wastes observed at the subject property appeared to be stored properly, with no evidence of spills or leaks.

According to Mr. Belk, the building located adjacent to the north of the current maintenance shop was the previous location of the maintenance shop. No evidence of spills or leaks was observed in the former maintenance shop.

6.2.2 Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs/USTs)

No evidence of current USTs was observed during the site reconnaissance other than the 10,000-gallon in-ground wastewater tank located on the southwestern portion of the site (See Section 6.1.6). As discussed 4.1.2, three USTs were removed from the subject property in 1987.

The facility operates a vehicle fueling station located on the southwest portion of the subject property. A 12,000-gallon diesel/gasoline aboveground storage tank (AST) and fuel dispenser was observed in the area of the fueling station. The AST is a split tank consisting of 9,000-gallon diesel and 3,000-gallon gasoline and was installed in August 1996.

As discussed in Section 6.1.6, additional ASTs associated with the wastewater treatment system were observed in the southwestern portion of the subject property.

6.2.3 Evidence of Releases

No spills, stains or other indications that a surficial release has occurred at the subject property were observed.

6.2.4 Polychlorinated Biphenyls (PCBs)

Older transformers and other electrical equipment could contain PCBs at a level that subjects them to regulation by the U.S. EPA. PCBs in electrical equipment are controlled by United States Environmental Protection Agency regulations 40 CFR, Part 761. Under the regulations, there are three categories into which electrical equipment can be classified: 1) Less than 50 parts per million (ppm) of PCBs – “Non-PCB;” 2) 50 ppm-500 ppm – “PCB-Contaminated;” and, 3) Greater than 500 ppm – “PCB-Containing.” The

manufacture, process, or distribution in commerce or use of any PCB in any manner other than in a totally enclosed manner was prohibited after January 1, 1977.

The on-site reconnaissance addressed indoor and outdoor transformers that may contain PCBs. Two pad-mounted transformers were observed on the northeastern portion of the site, east of the Packaging/Former Dicing Building and on the eastern boundary of the site, along Alder Avenue. adjacent to the southwest corner of the building. The transformers were not labeled indicating PCB content. No staining or leakage was observed in the vicinity of the transformer. Electrical service is provided to the site by SCE, which retains responsibility for maintenance and clean-up of leaks or spills associated with the transformers. Based on the good condition of the equipment, the transformers are not expected to represent a significant environmental concern.

No other potential PCB-containing equipment (interior transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, balers, etc.) was observed on the subject property during Partner's reconnaissance.

6.2.5 Strong, Pungent or Noxious Odors

No strong, pungent or noxious odors were evident during the site reconnaissance.

6.2.6 Pools of Liquid

No pools of liquid were observed on the subject property during the site reconnaissance.

6.2.7 Drains, Sumps and Clarifiers

As discussed in Section 6.1.6 and 2.2, the wastewater treatment system utilizes a 5,000-gallon sump and an aboveground clarifier. An open, circular clarifier was observed in the northwestern production area to trap waste vegetable pulp.

No other drains, sumps, or clarifier were observed on the subject property during the site reconnaissance.

6.2.8 Pits, Ponds and Lagoons

No pits, ponds or lagoons were observed on the subject property.

6.2.9 Stressed Vegetation

No stressed vegetation was observed on the subject property.

6.2.10 Additional Potential Environmental Hazards

As discussed in Section 4.1.2, former brine ponds have been capped on the southwestern portion of the subject property.

No other additional environmental hazards were observed.

6.3 Non-ASTM Services

6.3.1 Asbestos-Containing Materials (ACMs)

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos, for purposes of this regulation. All thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building constructed prior to 1981 and have not been appropriately tested are "presumed asbestos-containing material" (PACM).

Based on the age of the subject property buildings (pre-1980), there is a potential that ACM is present. Prior to any disturbance of the construction materials at the subject property, a comprehensive ACM survey is recommended.

6.3.2 Lead-Based Paint (LBP)

Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (or 5,000 ug/g or 0.5% by weight) or more of lead.

Based on the age of the subject property buildings (pre-1978), there is a potential that LBP is present.

6.3.3 Radon

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the table below:

EPA Radon Zones		
EPA Zones	Average Predicted Radon Levels	Potential
Zone 1	Exceed 4.0 pCi/L	Highest
Zone 2	Between 2.0 and 4.0 pCi/L	Moderate
Zone 3	Less than 2.0 pCi/L	Low

It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the US EPA recommends site-specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not conducted as part of this assessment. Review of the US EPA Map of Radon Zones places the subject property in Zone 2. Based upon the radon zone classification and commercial use, radon is not considered to be a significant environmental concern.

6.3.4 Lead in Drinking Water

According to available information, a public water system operated by the San Bernardino County Water and Sanitation Division. According to the 2017 Annual Water Quality Report, water supplied to the subject property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper. Water sampling was not conducted to verify water quality.

6.3.5 Microbial Growth

Microbial growths are microscopic organisms found virtually everywhere, indoors and outdoors. Microbial growths will grow and multiply under the right conditions, needing only sufficient moisture (e.g. in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding).

Partner observed accessible, interior areas of the subject property building for significant evidence of microbial growth with the exceptions detailed in Section 1.5 of this report; however, this ESA should not be used as a microbial growths survey or inspection. This limited assessment was not designed to assess all areas of potential microbial growth that may be affected by microbial growth on the subject property. Rather, it is intended to give the client an indication as to whether or not conspicuous (based on observed areas) microbial growth is present at the subject property. This evaluation did not include a review of pipe chases, mechanical systems, or areas behind enclosed walls and ceilings.

No obvious indications of water damage or microbial growth were observed during Partner's visual assessment.

6.4 Adjacent Property Reconnaissance

The adjacent property reconnaissance consisted of observing the adjacent properties from the subject property premises. No items of environmental concern were identified on the adjacent properties during the site assessment, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

7.0 FINDINGS AND CONCLUSIONS

Findings

A *recognized environmental condition (REC)* refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

- Partner did not identify recognized environmental conditions during the course of this assessment.

A *controlled recognized environmental condition (CREC)* refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The following was identified during the course of this assessment:

- Partner did not identify controlled recognized environmental conditions during the course of this assessment.

A *historical recognized environmental condition (HREC)* refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The following was identified during the course of this assessment:

- In August 1996, three USTs were removed from the subject property. The USTs included a 500-gallon gasoline UST, a 1,000-gallon gasoline UST, and a 10,000-gallon diesel UST that were formerly located northwest of the maintenance shop. The USTs were formerly part a vehicle fueling station. According to site personnel, the USTs were removed under the oversight of the SBCFD. Partner has requested SBCFD records to confirm regulatory closure of USTs. SBCFD records are pending. Based on the regulatory closure, the former USTs will be considered a historical recognized environmental condition.

An *environmental issue* refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of this assessment:

- The subject property is listed as a Land Disposal Site (LDS) with deed restrictions. In April 1999, GBFP reportedly completed the capping of salt-affected areas at the facility per Cleanup & Abatement Order (CAO) No. 97-64 issued by the RWQCB. GBFP is obligated to maintain the brine pond closure cap in accordance with the recorded deed restrictions. Post-Closure Cover Maintenance and Monitoring –Annual Reports for the closed brine ponds and quarterly Cap Inspections are required quarterly to assess the condition of the cover. GBFP is required to

comply with the RWQCB notification requirements (new property ownership, permit revision for brine pond cap maintenance, annual fee assessment, etc.) when there is a change in ownership of the property where the closed brine ponds are located. The brine pond cap shall not be modified unless and until the RWQCB's Executive Officer has been notified in writing of the nature of the modification(s) and has been given a reasonable opportunity to comment on, or reasonably approved or disapprove of, the proposed modification.

- It was noted in the RWQCB records that the brine wastewater had likely impacted adjacent properties to the south. No further documentation was available regarding how this issue was resolved.
- All hazardous materials no longer being used and hazardous wastes observed at the subject property should be removed and properly disposed of by a licensed contractor.
- Septic systems located at the subject property parcels should be removed and properly closed by a licensed contractor if no longer in use.
- A railroad spur is located on the northern boundary of the subject property. If the remaining tracks are removed and soil excavated for re-development, the presence of metals, total petroleum hydrocarbons, and polynuclear aromatic hydrocarbons in soil is possible and can be managed at that time.
- Due to the age of the subject property buildings, there is a potential that asbestos-containing material (ACM) and/or lead-based paint (LBP) are present. Suspect ACMs and chipped and peeling painted surfaces were observed at the subject property. The identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any demolition activities that would impact them to prevent potential exposure to workers. Furthermore, OSHA regulations require that contractors performing work that will impact these surfaces be informed of the presence of the lead in paint so that they can take the proper precautions when performing their work. Prior to demolition, ACMs will require abatement in accordance with local regulations.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 10380 Alder Avenue, in the unincorporated community of Bloomington, San Bernardino County, California (the "subject property"). Any exceptions to or deletions from this practice are described in Section 1.5 of this report.

This assessment has revealed evidence of a historical recognized environmental condition and environmental issues as discussed above. It is Partner's understanding that the developer will address the issues and recommendations described above.

8.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

Partner has performed a Phase I Environmental Site Assessment of the property located at 10380 Alder Avenue, in the unincorporated community of Bloomington, San Bernardino County, California in general conformance with the scope and limitations of the protocol and the limitations stated earlier in this report. Exceptions to or deletions from this protocol are discussed earlier in this report.

By signing below, Partner declares that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in §312.10 of 40 CFR §312. Partner has the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. Partner has developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Copies of the resumes of those involved in the preparation of this report are provided in **Appendix D**.

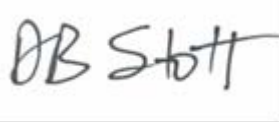
This report has been prepared, under the responsible charge of the Environmental Professional identified below, by:

Prepared By:



Heather Hodgetts
Senior Scientist

Reviewed by:



Debbie Stott, P.G.
Technical Director

9.0 REFERENCES

Reference Documents

American Society for Testing and Materials, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation: E 1527-13.

California Department of Conservation, Division of Oil, Gas, and Geothermal (DOGGR) Online Mapping System (DOMS). <http://maps.conservation.ca.gov/doms/index.html>.

California Department of Toxic Substances Control (DTSC), ENVIROSTOR Database, <http://www.envirostor.dtsc.ca.gov/public/>.

California State Water Resources Control Board (SWRCB), GeoTracker Database, <http://geotracker.swrcb.ca.gov/>.

Environmental Data Resources, Inc. (EDR), EDR Radius Map™ Report, October 2018.

EDR, EDR Aerial Photo Decade Package, October 2018.

EDR, EDR Certified Sanborn Map ®, October 2018.

EDR, EDR Historical Topographic Map Report, October 2018.

EDR, EDR-City Directory Abstract, October 2018.

Federal Emergency Management Agency, Federal Insurance Administration, National Flood Insurance Program, Flood Insurance Map, accessed via internet, October 2018.

United States Environmental Protection Agency, EPA Map of Radon Zones (Document EPA-402-R-93-071), accessed via the Internet, October 2018.

United States Geological Survey Topographic Map 2012, 7.5 minute series, *Fontana, California*, scale 1:24,000.

FIGURES

- 1 SITE LOCATION MAP**
- 2 SITE PLAN**
- 3 TOPOGRAPHIC MAP**

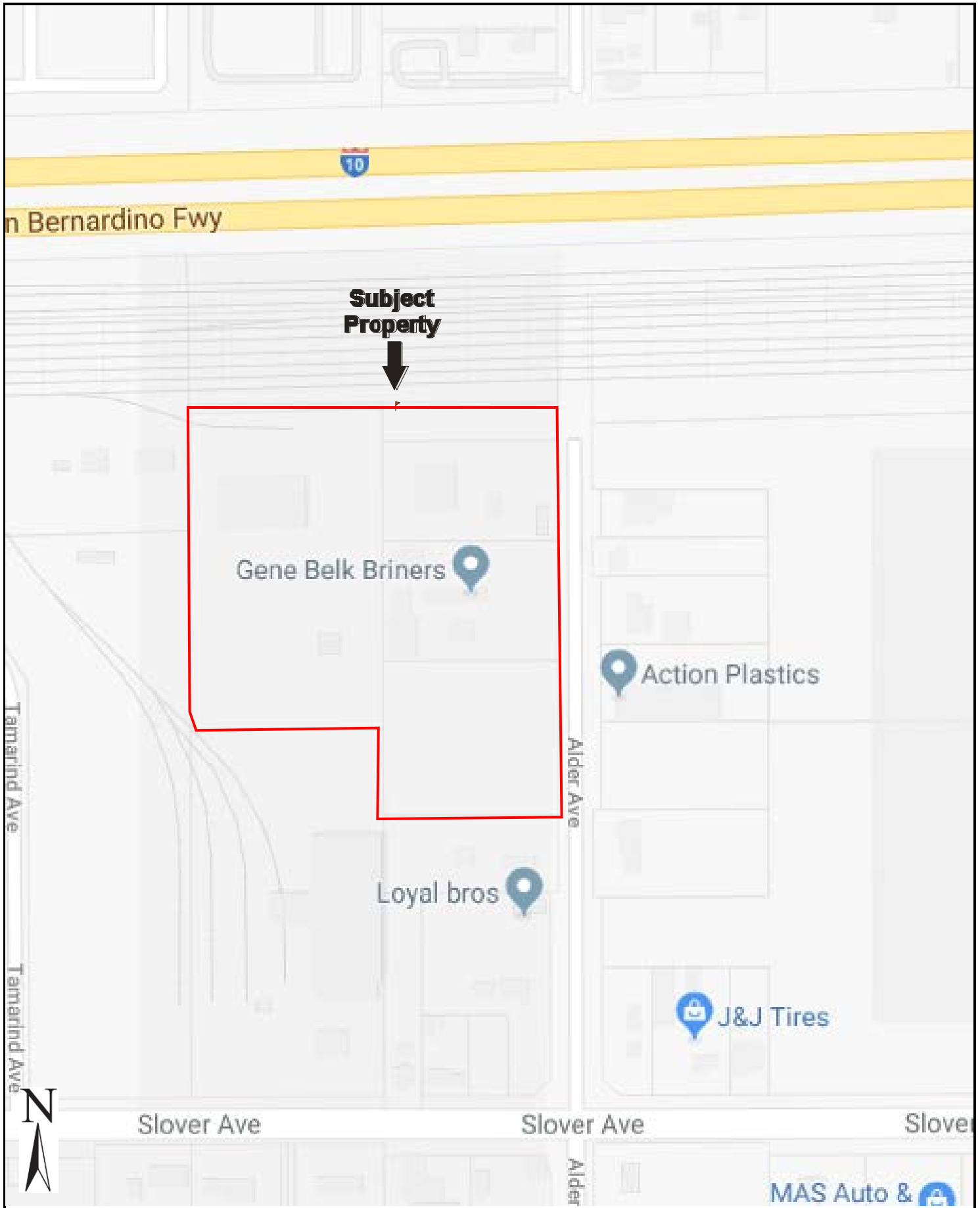
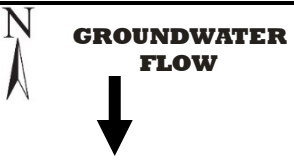


FIGURE 1: SITE LOCATION MAP
Project No. 18-230432.1

Drawing Not To Scale

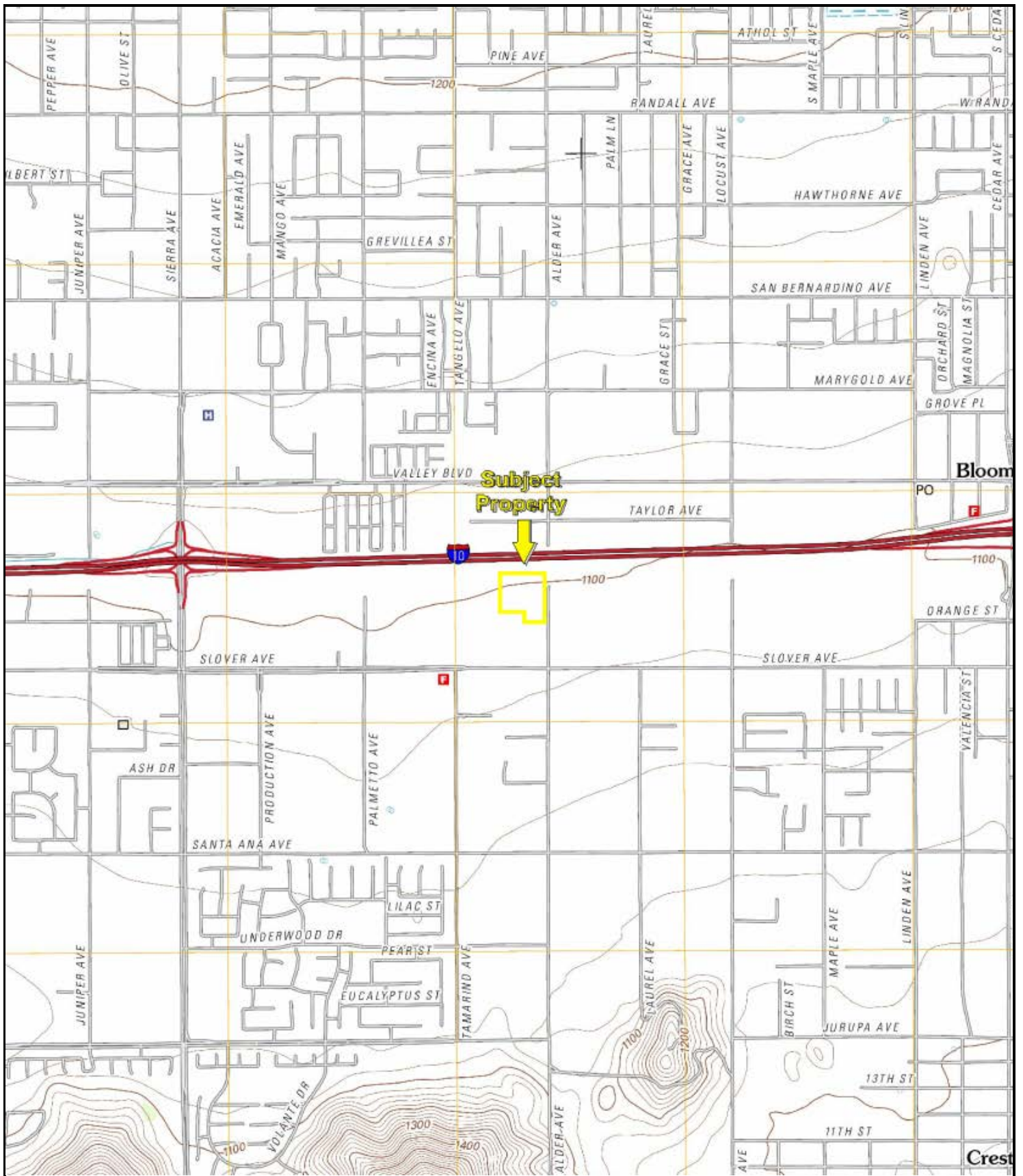
PARTNER



- KEY:**
- Subject Property
 - Railroad Spur
 - Brine Pond Soil Cap Area
- H** – Hazardous Waste Storage Area
 - T** – Transformer
 - S** – Septic Tanks
 - U** - Former USTs
- | | |
|---|--|
| <ul style="list-style-type: none"> 1 Vegetable Processing Area 2 Packaging/Formal Dicing Building 3 Former Maintenance Shop 4 Former Offices 5 Maintenance Shop 6 Storage Area/Office | <ul style="list-style-type: none"> 7 Truck Scale 8 Fuel AST 9 Food Waste Area 10 Wastewater Treatment 11 Wastewater Sump 12 Wastewater UST |
|---|--|

FIGURE 2: SITE PLAN
Project No. 18-230432.1





USGS 7.5 Minute *Fontana, California* Quadrangle
 Created: 2012

KEY:
 Subject Property 

FIGURE 3: TOPOGRAPHIC MAP
 Project No. 18-230432.1

