



AEI Consultants

February 19, 2020
(Revised February 21, 2020)

LIMITED PHASE II SUBSURFACE INVESTIGATION

Property Identification:

P & B Tire
13906 Old 215 Frontage Road
Moreno Valley, California 92553

AEI Project No. 414659

Prepared for:

Mr. Dane Palanjian
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February 19, 2020

Mr. Dane Palanjian
Phelan Development Company
450 Newport Center Drive, Suite 405
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Subject: Limited Phase II Subsurface Investigation
P & B Tire
13906 Old 215 Frontage Road
Moreno Valley, California 92553
AEI Project No. 414659

AEI Consultants (AEI) is pleased to provide this report which describes the activities and results of the Limited Phase II Subsurface Investigation (Phase II) performed at the above referenced Site (Figures 1 and 2). This investigation was completed in general accordance with the scope of services outlined in our authorized proposal number 68437.

1.0 SITE DESCRIPTION

The Site is an independent tire shop (P & B Tire) on the eastern side of Old 215 Frontage Road in a mixed commercial and residential area of Moreno Valley, California (Figure 2). The facility consists of one, single-story main building with one indoor service bay, workshop, and office space in the center of the Site. Attached to the northern part of the Site building is a storage room for tires. Tires are also stored along the northern fence, in the southeastern portion of the Site, and in a large, partially covered area on the eastern side of the building. The Site is surrounded by chain-link fencing and is improved with asphalt and concrete paving.

The Site is relatively flat and sits at an elevation of approximately 1,541 feet above mean sea level. The regional topographic gradient direction slopes toward the northeast and, therefore, the direction of groundwater flow beneath the Site is inferred to be to the northeast.

According to the *Second Quarter 2019 Monitoring and Status Report*, dated July 30, 2019 by Stratus Environmental, Inc. (Stratus) of Ventura, California, the average depth to groundwater 0.16-mile southwest of the Site (across Old 215 Frontage Road) is approximately 12.29 feet below ground surface (bgs). The Site is underlain by Quaternary alluvium.

2.0 BACKGROUND

A Phase I Environmental Site Assessment (ESA) was performed by AEI and documented in a report dated October 7, 2019 (AEI Project Number 412104). As detailed in the Phase I ESA, the Site was an active service station for approximately three decades from the 1950's until the 1980's. One of the service bays is equipped with an in-ground hydraulic lift, believed to have been installed during the 1950s. The hydraulic oil used in lifts manufactured prior to 1977 typically

contained polychlorinated biphenyls (PCBs). Therefore, the presence of the hydraulic lift was considered a recognized environmental condition (REC).

A search of county and municipal records yielded no information regarding the status or removal of underground storage tanks (USTs) that would have been used to store fuel when the gasoline station was in operation. The length of time during which the gasoline station was in operation and the lack of permits or records indicating that the USTs had been removed, confirmation soil samples collected, and the USTs transported for destruction was cited as a REC.

AEI's search of the regulatory database indicated that the sludge removed from a clarifier on the Site was properly disposed of at a licensed facility. However, there were no records indicating the date when the clarifier was installed or where on the Site it was installed or its current condition. The unknown location and condition of the clarifier was cited in the Phase I ESA as a REC.

On November 15, 2019, AEI performed a Limited Phase II subsurface investigation on the Site. Due to the presence of items on the Site, access was significantly limited in the designated areas on the Site using geophysical methods to definitively identify the location of the former USTs. Likewise, the presence of these items on the Site obstructed AEI's ability to access the former clarifier using drilling equipment.

AEI advanced four soil borings (SB-1 through SB-4) on the Site using a hand auger (SB-1) and a track-mounted direct-push drilling rig (SB-2, SB-3, and SB-4). Due to the density of the soil, AEI was able to reach target depth (of 15 feet bgs) only in soil boring SB-2, located near the in-ground hydraulic lift. Soil boring SB-1, advanced near the former clarifier, met refusal at a depth of 5 feet bgs, short of its target depth of 10 feet bgs. Two soil borings (SB-3 and SB-4) advanced near the possible location of the USTs, refusal at a depth of 13 feet bgs, short of the target depth of 20 feet bgs.

One soil sample from each boring was submitted to the laboratory and analyzed for total petroleum hydrocarbons (TPH) as gasoline (TPH-g), diesel (TPH-d), and TPH as (motor oil) and volatile organic compounds (VOCs). The soil sample selected from SB-2, near the in-ground hydraulic lift was also analyzed for polychlorinated biphenyls (PCBs). TPH and VOCs were not detected above their respective laboratory method detection limits in the soil samples analyzed. However, as AEI was unable to reach target depths using direct-push technology, following discussions with the Client, it was decided to attempt a second ground-penetrating radar scan following the removal or relocation of previously obstructing items and to re-drill the Site to the original target depths using a hollow-stem auger drilling rig.

The purpose of this investigation was to attempt to confirm the location of the UST area after the Site was partially cleared by the tenant, then using a hollow-stem auger drilling rig, to advance borings to their target depths.

3.0 INVESTIGATION EFFORTS

AEI was asked to perform an additional Limited Phase II, including the performance of an expanded ground-penetrating radar survey to attempt location the UST area and to advance borings to the original target depths described in Section 2.0.

This work was performed under the oversight of a California licensed Professional Geologist.

3.1 Health and Safety Plan

A site-specific Health And Safety Plan was prepared, reviewed by onsite personnel, and kept onsite for the duration of the fieldwork.

3.2 Permitting and Utility Clearance

Drilling permits were not required for this investigation. The public underground utility locating service DigAlert was notified to identify public utilities in the work area. Private utility locating was conducted by Ground Penetrating Radar Systems, Inc. (GPRS) of Los Angeles, California to identify underground utilities on the Site.

3.3 Ground Penetrating Radar Survey

On February 3, 2019, a ground penetrating radar (gpr) survey conducted by GPRS (Appendix A). The purpose of the geophysical survey was to attempt to locate either the USTs or evidence of the removal of USTs associated with the former gasoline station as well as to evaluate the proposed drilling locations for the presence of subsurface obstructions.

The survey was performed using a utility locating wand, a magnetometer and ground-penetrating radar. The results of the survey did not detect the presence of a signal indicating the presence of USTs. A signal of appropriate dimensions indicating an excavated area was likewise not detected by ground-penetrating radar. In addition to subsurface indicators, GPRS attempted to ascertain the location of the UST area by looking for the outline of fill-ports in the asphalt and for vent-pipes. However, these were not observed.

The client should be aware of the inherent limitations of geophysical surveying methods and that above and underground utilities and other man-made or natural features (i.e. automobiles, debris piles, tree roots, reinforced concrete, certain soil conditions, etc.), if within the area of the survey, may decrease the effectiveness of the survey. The client should be aware that the lack of a detection of a feature from a geophysical survey does not mean that the feature does not exist only that it was not detected.

AEI contacted the Client to inform them of the results of the survey. AEI recommended altering the scope by eliminating one of the two 20-foot borings that would have been advanced had the UST area been located. In place of the second 20-foot boring, AEI recommended advancing a boring to a depth of 10-feet bgs near product piping located near the former dispensers. The Client concurred with AEI's recommendation.

3.4 Drilling and Soil Sample Collection

On February 3, 2020, three (3) soil borings (SB-5 through SB-7) were advanced on the Site (Figure 2). The borings were advanced by MR Drilling of Buena Park, California using track-mounted hollow-stem auger drilling rig equipped with 8-inch diameter hollow-stem augers and a California modified split-spoon sampler. The locations of the borings are listed below:

- Boring SB-5 was advanced near the former two-stage clarifier.

- Boring SB-6 was advanced in the norther portion of the Site near SB-3.
- Boring SB-7 was advanced near product lines detected near the former dispensers.

Borings SB-5 and SB-6 were advanced near the locations (SB-1 and SB-3, respectively), therefore soil samples were collected from depths exceeding those at which refusal was met in November 2019. A sample was collected from boring SB-5 at a depth of 10 feet bgs and soil samples were collected from SB-6 at depths of 15 feet and 20 feet bgs. In boring SB-7 (near product piping), soil samples were collected at depths of 2.5 feet, 5 feet, and 10 feet bgs.

The soil borings were logged using the Unified Soil Classification System. A photoionization detector (PID) was used to screen soil samples in the field. PID readings for each interval from which a sample was collected were included on the boring logs (Appendix B). Selected soil samples were collected in clean brass sleeves sealed with Teflon tape and plastic end caps.

Down-hole equipment was decontaminated using a triple rinse system containing detergent.

3.5 Boring Destruction

Following completion of sample collection, the augers were withdrawn, the boreholes were backfilled with hydrated bentonite, and completed at the surface with asphalt.

3.6 Laboratory Analyses

The soil samples were labeled and placed into a cooler with ice following sampling. The samples were transferred under appropriate chain-of-custody documentation to Alpha Scientific Corporation of Cerritos, California. As field screening did not indicate the presence of VOCs in the soil samples, samples were selected for analysis on the basis of location (Section 3.4) and depth. The 10-foot sample from boring SB-5, the 20-foot sample from SB-6, and the 2.5 foot sample from boring SB-7 were selected for analysis. Laboratory analytical documentation is provided in Appendix C.

Laboratory analysis of 3 soil samples consisted of the following:

- Total Petroleum Hydrocarbons (TPH-cc) by U.S. Environmental Protection Agency (EPA) Method 8015M
- Volatile Organic Compounds (VOCs) by U.S. EPA Method 8260B

3.7 Investigation Derived Waste

Soil wastes generated during drilling activities (i.e., soil cuttings) were stored on-Site in U.S. Department of Transportation-approved 55-gallon drums.

4.0 FINDINGS

The laboratory results of the soil analyses were reviewed and compared to the July 2019, Revision 2 of the Environmental Screening Levels (ESLs) for Commercial/Industrial scenarios. The ESLs are issued by the San Francisco Bay Regional Water Quality Control Board. The ESLs provide conservative screening levels for over 100 chemicals commonly encountered at sites with impacted soil, ground water, indoor air, and/or soil gas. The primary goal of the ESLs is the identification and evaluation of potential environmental concerns at impacted sites. Under most

circumstances, the presence of a chemical in soil, soil gas, groundwater, or indoor air detected at concentrations below their respective corresponding ESL can generally be assumed to not pose a significant threat to human health or the environment. In circumstances where a chemical is detected at concentrations exceeding its ESL, additional evaluation will generally be necessary.

For this investigation, AEI understands that the Site will continue as commercial, therefore, analytical results generated during this investigation were compared to the ESLs under the commercial land use scenario.

4.1 Geology and Hydrogeology

Sediment encountered in each of the borings generally consisted primarily of dense to very dense, dry, medium to coarse sand (Appendix B).

Groundwater was not encountered in soil borings SB-5, SB-6, or SB-7 and was not part of this investigation.

4.2 Soil Sample Analytical Results

The following information is a summary of the laboratory results of soil analyses (Appendix B). This information has also been included with the laboratory results of soil analyses from November 2019 and appears in Table 1.

The four soil samples submitted for laboratory analysis as part of this investigation were analyzed for the presence of TPH-cc and VOCs.

- TPH and VOCs were not detected at concentrations exceeding the laboratory method detection limits in the soil samples submitted for analysis.

5.0 SUMMARY AND CONCLUSIONS

AEI has completed a Limited Phase II at the Site. The purpose of this investigation was to complete of the scope of work described in AEI Proposal Number 67013 and performed in November 2019, as described in AEI's *Limited Phase II Subsurface Investigation* revised report dated December 18, 2020. Due to the density of soils encountered, direct-push technology met refusal in 3 of the 4 borings (SB-1 through SB-4) attempted and the inability to definitively locate the UST area, AEI recommended that items on the Site be relocated and that a different drilling technology be deployed.

On February 3, 2020, the tenant partially cleared the Site in the area of the suspected USTs. The geophysical survey was conducted in this area, however no signature consistent with USTs or UST excavation was identified. AEI informed the Client and recommended adjusting the described scope. AEI had been requested to extend a second boring near the former clarifier to 10 feet bgs and, presuming detection of the UST area, to advance two borings to 20 feet bgs near that area. However, given the inability of geophysical methods to identify the UST area, AEI recommended altering the scope of work to relocate one of the proposed 20 foot borings near the product lines near the former dispensers and to advance this boring to a depth of 10 feet bgs. The Client approved of this change in scope. Therefore, AEI extended one boring near the clarifier to 10

feet bgs (SB-5), one boring at the northern end of the Site to 20 feet bgs (SB-6), and one boring to a depth of 10 feet bgs near the product lines (SB-7).

One soil sample from each of the hollow-stem auger borings was submitted to the laboratory and analyzed for the presence of TPH and VOCs. TPH and VOCs were not detected in the soil samples submitted for analysis as part of this investigation.

Based on the results of this investigation, it is AEI's opinion that no further subsurface investigations are warranted at this time. Based on the results of two attempts to locate the UST area using geophysical methods, AEI recommends that any planned redevelopment of the Site include funding to cover the cost of encountering an unexpected condition (i.e., buried drums, USTs), and/or soil sampling if potentially impacted soils (i.e., discolored, shiny or oily, odorous) are encountered. Information regarding the estimated funding needed to resolve potential unexpected conditions has been presented to the Client in AEI's *Opinion of Probable Cost* letter dated December 10, 2019.

6.0 REPORT LIMITATIONS AND RELIANCE

This report presents a summary of work completed by AEI Consultants. The completed work includes observations and descriptions of site conditions encountered. Where appropriate, it includes analytical results for samples taken during the course of the work. The number and location of samples are chosen to provide the requested information, subject to scope of work for which AEI was retained and limitations inherent in this type of work, but it cannot be assumed that they are representative of areas not sampled. This report should not be regarded as a guarantee that no further contamination beyond that which could have been detected within the scope of this investigation is present beneath the Site. Undocumented, unauthorized releases of hazardous material, the remains of which are not readily identifiable by visual inspection and are of different chemical constituents, are difficult and often impossible to detect within the scope of a chemical specific investigation.

Any conclusions and/or recommendations are based on these analyses and observations, and the governing regulations. Conclusions beyond those stated and reported herein should not be inferred from this document. These services were performed in accordance with generally accepted practices, in the environmental engineering and construction field, which existed at the time and location of the work. No other warranty, either expressed or implied, has been made.

This investigation was prepared for the sole use and benefit of Phelan Development Company. All reports, both verbal and written, whether in draft or final, are for the benefit of Phelan Development Company. This report has no other purpose and may not be relied upon by any other person or entity without the written consent of AEI. 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 AEI granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against AEI, its officers, employees, vendors, successors or assigns. Reliance is provided in accordance with AEI's Proposal and Standard Terms & Conditions executed by Mr. Dane Palanjian. The limitation of liability defined in the Terms and Conditions is the aggregate limit of AEI's liability to the client and all relying parties.

Limited Phase II Subsurface Investigation
13906 Old 215 Frontage Road, Moreno Valley, California

If there are any questions regarding our investigation, please do not hesitate to contact AEI at 310-798-4255.

Sincerely,
AEI Consultants

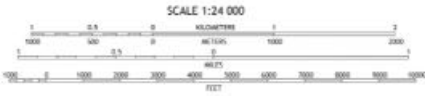
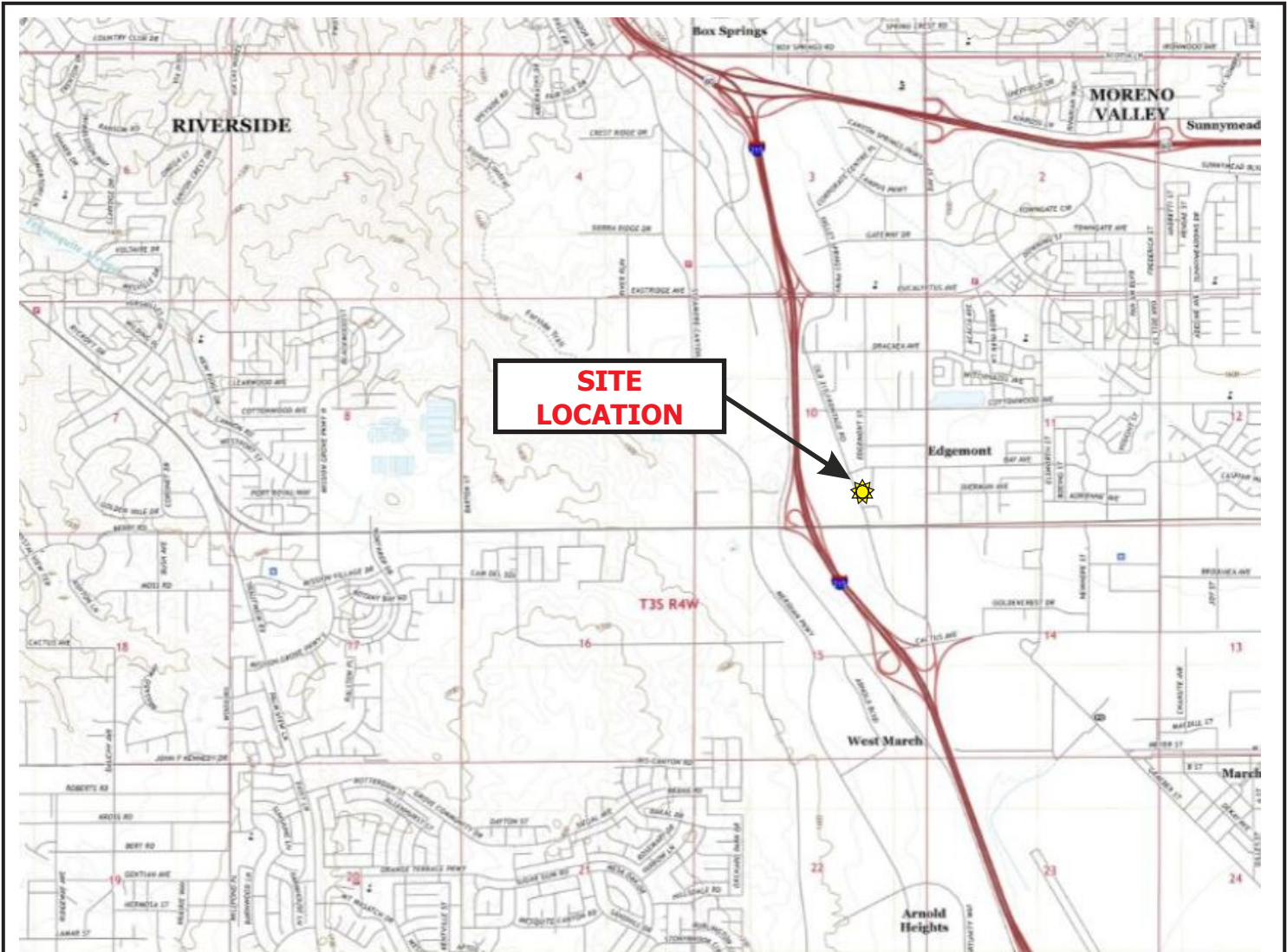


Alicia Siegel
Project Geologist



Kent Vollmer, P.G. #7918, C.E.G. #2479
Department Manager

FIGURES



LEGEND

Map: East Riverside, California Quadrangle
 Date: 2018
 Source: USGS



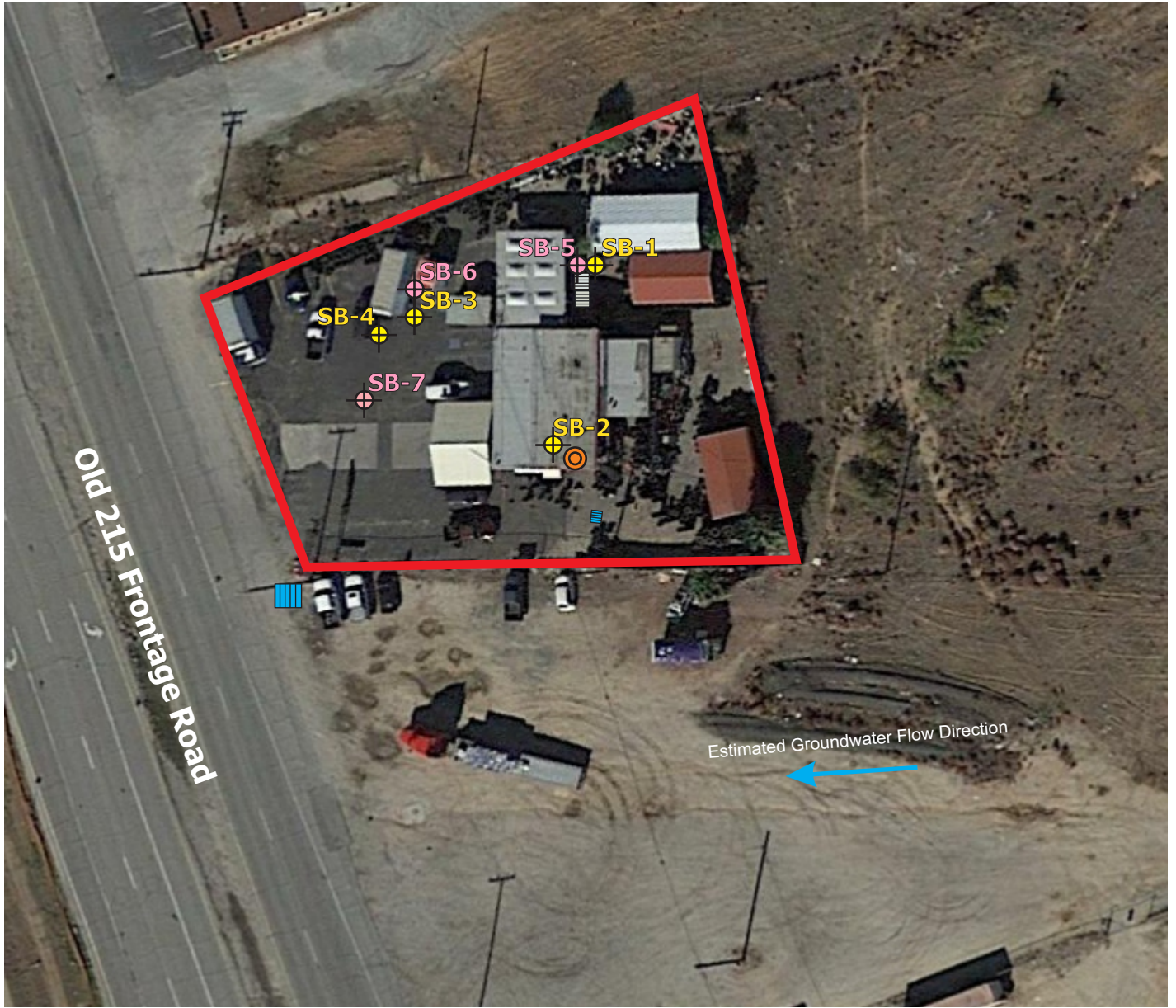
AEI Consultants

2207 West 190th Street, Torrance, California 90504

SITE LOCATION MAP

13906 Old 215 Frontage Road
 Moreno Valley, California 92553

FIGURE 1
 Project No. 414659



0 30 60
 SCALE: 1" = 60'



LEGEND	Approximate Site Boundary
SB-7	Approximate Hollow Stem Auger Sampling Location (Feb. 2020)
SB-4	Approximate Direct-Push Sampling Location (Nov. 2019)
	Approximate Location of In-ground Hydraulic Lift
	Approximate Location of Former Clarifier

AEI Consultants	
2207 West 190th Street, Torrance, California 90504	
SITE MAP	
13906 Old 215 Frontage Road Moreno Valley, California 92553	FIGURE 2 Project No. 414659

TABLES

TABLE 1: CUMULATIVE SOIL SAMPLE DATA SUMMARY-TPH, VOCs, PCBs
13906 Old 215 Frontage Road, Moreno Valley, California 92553
AEI Project No. 414569

			TPH by U.S. EPA Method 8015M			VOCs by U.S. EPA Method 8260B					U.S. EPA Method 8082
Location ID	Date	Depth (feet bgs)	TPH-g (mg/kg)	TPH-d (mg/kg)	TPH-o (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl- benzene (mg/kg)	Total Xylenes (mg/kg)	Other VOCs (mg/kg)	PCBs (mg/kg)
November 2019											
SB-1	11/15/2019	5	ND<0.2	ND<5	ND<25	ND<0.001	ND<0.001	ND<0.001	ND<0.002	<MDL	N/A
SB-2	11/15/2019	10	ND<0.2	ND<5	ND<25	ND<0.001	ND<0.001	ND<0.001	ND<0.002	<MDL	ND<0.025
SB-3	11/15/2019	13	ND<0.2	ND<5	ND<25	ND<0.001	ND<0.001	ND<0.001	ND<0.002	<MDL	N/A
SB-4	11/15/2019	13	ND<0.2	ND<5	ND<25	ND<0.001	ND<0.001	ND<0.001	ND<0.002	<MDL	N/A
February 2020											
SB-5	2/3/2020	10	ND<0.2	ND<5	ND<25	ND<0.001	ND<0.001	ND<0.001	ND<0.002	<MDL	N/A
SB-6	2/3/2020	20	ND<0.2	ND<5	ND<25	ND<0.001	ND<0.001	ND<0.001	ND<0.002	<MDL	N/A
SB-7	2/3/2020	2.5	ND<0.2	ND<5	ND<25	ND<0.001	ND<0.001	ND<0.001	ND<0.002	<MDL	N/A
Comparison Values in mg/kg - Environmental Screening Levels, Table S-1, Comm/Ind; SFBRWQCB, July 2019 Rev. 2			200	1,200	180,000	1.4	5,300	26	2,500	Varies	--

Notes:

- | | | | |
|--------------------------------------------------------------------------|--------------------------------------------------------------------------------------------|--------------|--------------------------------------------------------|
| Analyses performed by Alpha Scientific Corporation, Cerritos, California | N/A | Not Analyzed | |
| mg/kg | Milligrams per kilogram | EPA | Environmental Protection Agency |
| ND< | Not detected at or above the method detection limit (MDL) shown | -- | Comparison Value not Applicable |
| bgs | Below ground surface | TPH-g | Total Petroleum Hydrocarbons as gasoline |
| VOCs | Volatile Organic Compounds | TPH-d | Total Petroleum Hydrocarbons as diesel |
| Bold | Result exceeds applicable Comparison Value | TPH-o | Total Petroleum Hydrocarbons as oil |
| J | Estimated value above laboratory method detection limit, but below the limit for reporting | SFBRWQCB | San Francisco Bay Regional Water Quality Control Board |
| Table S-1 | Soil-Direct Exposure Human Health Risk Levels | Comm/Ind | Commercial/Industrial |

APPENDIX A
GROUND PENETRATING RADAR
SYSTEMS, INC.
REPORT



Summary of Scanning for Underground Storage Tanks (UST's)

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February 3, 2020

February 3, 2020

AEI Consultants

Attn: Alicia Siegel

Site: 13906 Old 215 Frontage Rd Moreno Valley, CA

We appreciate the opportunity to provide this report for our work completed on February 3, 2020.

PURPOSE

The purpose of this project was to search for any suspected underground storage tanks (USTs) or suspected UST-related piping or other anomalies remaining on the property. The scope of work consisted of 1 location measuring approximately 60' x 60'. The interiors of buildings were excluded from the scope of this project. The client marked the desired locations prior to our scanning and our markings were then placed onto the surface using spray paint.

EQUIPMENT

- **Underground Scanning GPR Antenna.** The antenna with frequencies ranging from 250 MHz-450 MHz is mounted in a stroller frame which rolls over the surface. The surface needs to be reasonably smooth and unobstructed in order to obtain readable scans. Obstructions such as curbs, landscaping, and vegetation will limit the feasibility of GPR. The data is displayed on a screen and marked in the field in real time. The total depth achieved can be as much as 8' or more with this antenna but can vary widely depending on the types of materials being scanned through. Some soil types such as clay may limit maximum depths to 3' or less. As depth increases, targets must be larger in order to be detected and non-metallic targets can be especially difficult to locate. Depths provided should always be treated as estimates as their accuracy can be affected by multiple factors. For more information, please visit: [Link](#)
- **Electromagnetic Pipe Locator.** The EM locator can passively detect the electromagnetic fields from live AC power or from radio signals travelling along some conductive utilities. It can also be used in conjunction with a transmitter to connect directly to accessible, metallic pipes or tracer wires. A current is sent through the pipe or tracer wire at a specific frequency and the resulting EM field can then be detected by the receiver. A utility's ability to be located depends on a variety of factors including access to the utility, conductivity, grounding, interference from other fields, and many others. Depths provided should always be treated as estimates as their accuracy can be affected by multiple factors. For more information, please visit: [Link](#)
- **Magnetometer.** The magnetometer detects the magnetic field of a ferromagnetic object. It responds to the difference in the magnetic field between two sensors. It is interpreted in the field by listening to changes in frequency as emitted by a speaker on the device. Larger metallic objects can be located at depths of up to 10' or more but total depths will depend on the size, type, shape, and orientation of objects along with the amount of interference from other objects. For more information, please visit: [Link](#)

PROCESS

The EM pipe locator was used to connect to accessible, traceable pipes that may be tank-related such as vent pipes or product lines. A current is induced onto the pipe which creates an electromagnetic field that can be traced using the receiver. We can then attempt to trace these pipes to their origin or end point and paint or flag their locations.

Initial GPR scans were collected in order to evaluate the data and calibrate the equipment. Based on these findings, a scanning strategy is formed, consisting of scanning the entire area in a grid with 1' scan spacing in order to locate any potential UST's that may remain at the site. The GPR data is viewed in real time and anomalies in the data were located and marked on the surface along with their depths using spray paint. Relevant scan examples were saved and will be provided in this report.

The magnetometer was used to sweep the site every 3'-5' to search for readings that may represent buried, ferrous objects. Upon detection, the readings will be marked on the surface and then investigated from multiple directions and with other methods such as GPR.

LIMITATIONS

Please keep in mind that there are limitations to any subsurface investigation. The equipment may not achieve maximum effectiveness due to soil conditions, above ground obstructions, reinforced concrete, and a variety of other factors. No subsurface investigation or equipment can provide a complete image of what lies below. Our results should always be used in conjunction with as many methods as possible including consulting existing plans and drawings, exploratory excavation or potholing, visual inspection of above-ground features, and utilization of services such as One Call/811. Depths are dependent on many factors so depth accuracy can vary throughout a site and should be treated as estimates only. Relevant scan examples were saved and will be provided in this report.

FINDINGS

The subsurface conditions at the time of the scanning allowed for maximum GPR depth penetration of 2' in most areas. Multiple utilities were observed during the scanning; however, utility locating was not part of the scope of this project. The equipment and methods used did not detect reactions from potential UST's. The following pages will provide further explanation of the findings.



Legend

-  Scan area
-  Untitled Path








Google Earth



100 ft


Prepared for: Alicia Siegel
 Prepared By: David Henneman
 Date of Scanning: 02/03/2020

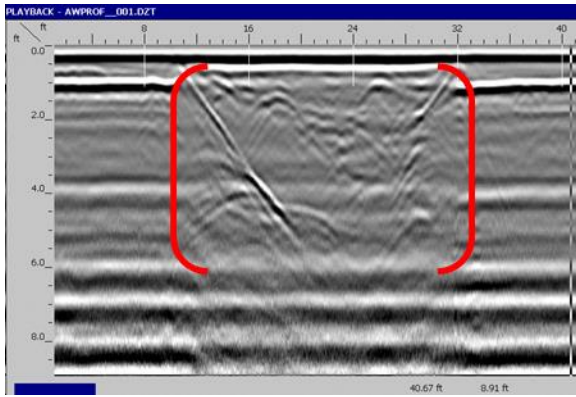
Terms and Conditions
 GPRS does not provide land survey or civil engineering data collection or documentation. This is provided as a reference map of the field markings and is not survey-grade.

LEGEND			
	ELECTRIC		SANITARY
	WATER		STORM
	COMM		UNKNOWN
	GAS		

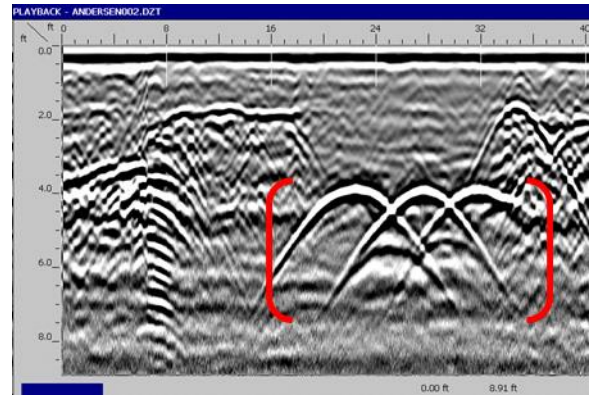
13906 Old 215 Frontage Rd Moreno Valley, CA

Prepared by:

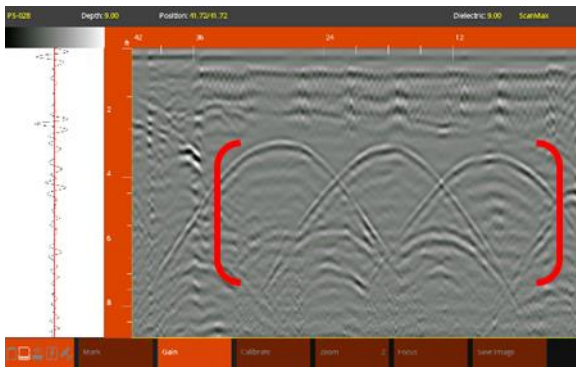




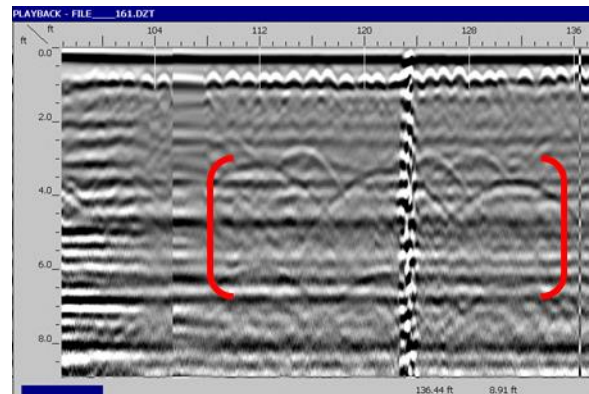
Sample GPR data screenshot showing a possible former tank pit or excavation. The change in the data from the excavation is apparent but GPR cannot determine whether this is due to a tank removal or whether tanks may still exist beyond the maximum depth penetration of the GPR signal.



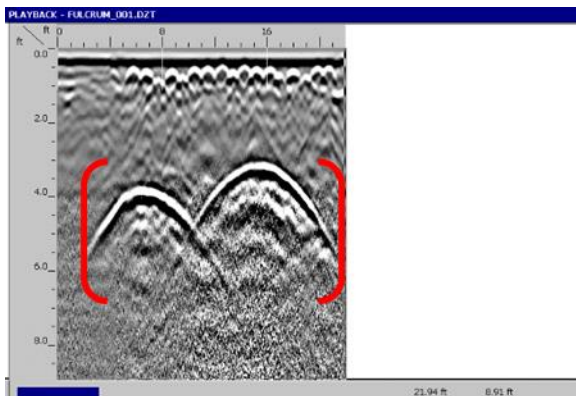
Sample GPR data screenshot showing three reactions from probable USTs. The diameters cannot be determined from these hyperbolas but they can be seen to be larger than a reaction from a typical utility.



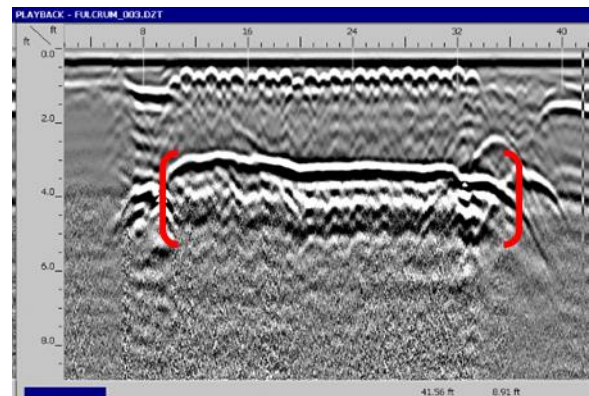
Sample GPR data screenshot showing three reactions from known USTs at an active fueling station. The concrete above the USTs is reinforced with wire mesh.



Sample GPR data screenshot showing three reactions from known USTs at an active fueling station. These USTs are non-metallic and therefore have a weaker reflection that is more difficult and sometimes impossible to identify in the GPR data.



Sample GPR data screenshot showing two potential USTs. These reactions are larger than a typical utility but large utilities can look identical to a UST.

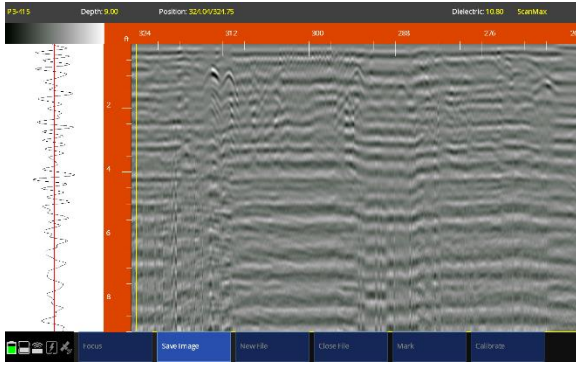


Sample GPR data screenshot showing a scan collected parallel along the top one of the suspected USTs shown in the data to the left. A parallel scan is used to determine a clear beginning and end to the reaction to the reaction which is an indicator of a UST and to determine an approximate length.

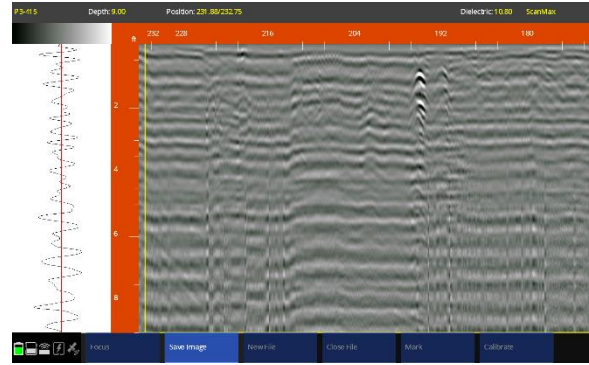
Sample Data Screenshots.
(Not taken from this project)

Location:
previously collected from various sites





GPR data screenshot showing reactions for piping, but no clear evidence of USTs or of excavation.



GPR data screenshot showing reactions for piping, but no clear evidence of USTs or of excavation.



Photo showing where unknown piping was located either with an EM pipe locator or GPR.



Photo showing where unknown piping was located either with an EM pipe locator or GPR.

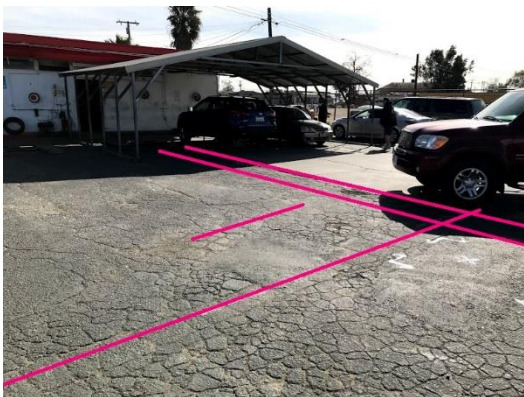


Photo showing where unknown piping was located either with an EM pipe locator or GPR.



Photo showing where unknown piping was located either with an EM pipe locator or GPR.

Sample Data Screenshots.
Photos.

Location:
13906 Old 215 Frontage Rd Moreno Valley,
CA



CLOSING

GPRS, Inc. has been in business since 2001, specializing in underground storage tank location, concrete scanning, utility locating, and shallow void detection for projects throughout the United States. I encourage you to visit our website (www.gprsinc.com) and contact any of the numerous references listed.

GPRS appreciates the opportunity to offer our services, and we look forward to continuing to work with you on future projects. Please feel free to contact us for additional information or with any questions you may have regarding this report.

Signed,

David Henneman
Project Manager—Southern California



Direct: 909.609.5265

David.Henneman@GPRSINC.com

www.gprsinc.com

Reviewed,

Kasey Kearcher

Kasey Kearcher
Regional Manager of Operations—West Coast



Direct: 503.502.4781

Kasey.Kearcher@gprsinc.com

www.gprsinc.com

APPENDIX B

BORING LOGS



AEI CONSULTANTS
 2207 West 190th Street
 Torrance, CA 90504
 Telephone: 310-798-4255
 Fax: 310-846-5594

BORING NUMBER SB-5

CLIENT Phelan Development Company **PROJECT NAME** P & B Tire Co.
PROJECT NUMBER 414659 **PROJECT LOCATION** 13906 Old 215 Frontage Rd., Moreno Valley, CA
DATE STARTED 2/3/20 **COMPLETED** 2/3/20 **GROUND ELEVATION** _____ **HOLE SIZE** 8 inches
DRILLING CONTRACTOR MR Drilling, Buena Park, CA **GROUND WATER LEVELS:**
DRILLING METHOD CME-75 Hollow Stem Auger Track Rig **AT TIME OF DRILLING** --- N/A
LOGGED BY A. Siegel **CHECKED BY** K. Vollmer **AT END OF DRILLING** --- N/A
NOTES Located near former clarifier **AFTER DRILLING** --- N/A

AEI BORING - GINT STD US LAB.GDT - 2/14/20 01:49 - P:\COMPANYWIDE PROJECTS\414000 SERIES\414659 MORENO VALLEY, CATASK 1 - LPH11 11-2019\BORING LOGS\414659 BORING LOGS.GPJ

DEPTH (ft)	SAMPLE TYPE NUMBER	BLOW COUNTS	PID DATA (ppm)	GRAPHIC LOG	MATERIAL DESCRIPTION	COMPLETION
0.0						
0.3				0.3	ASPHALT - 4 inches thick	
2.5					SAND (SP) - Brown (7.5YR; 4/4), dense, dry, medium to coarse, trace fine subangular gravel	
5.0						
7.5						
10.0	SB-5-10	28-50	0		SAND (SP) - Brown (7.5YR; 4/4), very dense, dry, medium to coarse, trace fine subangular gravel	

Bottom of borehole at 10.0 feet.



AEI CONSULTANTS
 2207 West 190th Street
 Torrance, CA 90504
 Telephone: 310-798-4255
 Fax: 310-846-5594

BORING NUMBER SB-6

CLIENT Phelan Development Company **PROJECT NAME** P & B Tire Co.
PROJECT NUMBER 414659 **PROJECT LOCATION** 13906 Old 215 Frontage Rd., Moreno Valley, CA
DATE STARTED 2/3/20 **COMPLETED** 2/3/20 **GROUND ELEVATION** _____ **HOLE SIZE** 8 inches
DRILLING CONTRACTOR MR Drilling, Buena Park, CA **GROUND WATER LEVELS:**
DRILLING METHOD CME-75 Hollow Stem Auger Track Rig **AT TIME OF DRILLING** --- N/A
LOGGED BY A. Siegel **CHECKED BY** K. Vollmer **AT END OF DRILLING** --- N/A
NOTES Located near SB-3 **AFTER DRILLING** --- N/A

AEI BORING - GINT STD US LAB.GDT - 2/14/20 01:49 - P:\COMPANYWIDE PROJECTS\414000 SERIES\414659 MORENO VALLEY, CATASK 1 - LPH11 11-2019\BORING LOGS\414659 BORING LOGS.GPJ

DEPTH (ft)	SAMPLE TYPE NUMBER	BLOW COUNTS	PID DATA (ppm)	GRAPHIC LOG	MATERIAL DESCRIPTION	COMPLETION
0						
0.3					ASPHALT - 4-inches thick	
					SAND (SP) - Brown (7.5YR; 4/4), dense, dry, fine sand, trace silt	
5					@ 5 feet - medium to coarse sand	
10						
13.5					@ 13.5 feet - Pale yellow (2.5YR; 7/4), dense, moist, medium to coarse	
15	SB-6-15	22-50	0		SAND (SP) - Pale Yellow (2.5YR; 7/4), very dense, dry, coarse granitic sand, micaceous	
20	SB-6-20	25-50	0		@ 20 feet - Same as 15 feet	

Bottom of borehole at 20.0 feet.



AEI CONSULTANTS
 2207 West 190th Street
 Torrance, CA 90504
 Telephone: 310-798-4255
 Fax: 310-846-5594

BORING NUMBER SB-7

CLIENT Phelan Development Company **PROJECT NAME** P & B Tire Co.
PROJECT NUMBER 414659 **PROJECT LOCATION** 13906 Old 215 Frontage Rd., Moreno Valley, CA
DATE STARTED 2/3/20 **COMPLETED** 2/3/20 **GROUND ELEVATION** _____ **HOLE SIZE** 8 inches
DRILLING CONTRACTOR MR Drilling **GROUND WATER LEVELS:**
DRILLING METHOD CME-75 Hollow Stem Auger Track Rig **AT TIME OF DRILLING** --- N/A
LOGGED BY A. Siegel **CHECKED BY** K. Vollmer **AT END OF DRILLING** --- N/A
NOTES Located near presumed product lines/fmr dispensers **AFTER DRILLING** --- N/A

AEI BORING - GINT STD US LAB.GDT - 2/14/20 01:49 - P:\COMPANYWIDE PROJECTS\414000 SERIES\414659 MORENO VALLEY, CA\TASK 1 - LPH11 11-2019\BORING LOGS\414659 BORING LOGS.GPJ

DEPTH (ft)	SAMPLE TYPE NUMBER	BLOW COUNTS	PID DATA (ppm)	GRAPHIC LOG	MATERIAL DESCRIPTION	COMPLETION
0.0						
0.3				0.3	ASPHALT - 4-inches thick	
2.5	SB-7-2.5	30-50	0	[Pattern]	SAND (SP) - Brown (7.5YR; 4/4), very dense, dry, coarse sand, micaceous	
5.0	SB-7-5	21-30-35	0	[Pattern]	SAND (SP) - Brown (7.5YR; 4/4), very dense, dry, coarse sand, micaceous	
10.0	SB-7-10	32-50	0	[Pattern]	SAND (SP) - Pale Yellow (2.5YR; 7/4), very dense, dry, coarse sand, micaceous	
10.0						

Bottom of borehole at 10.0 feet.

APPENDIX C

LABORATORY ANALYTICAL REPORT





Alpha Scientific Corporation
Environmental Laboratories

02-10-2020

Ms. Alicia Siegel
AEI Consultants
2207 W. 190th Street
Torrance, CA 90504

Project: 414659
Project Site: 13906 Old 215 Frontage, Moreno Valley, CA
Sample Date: 02-03-2020
Lab Job No.: AI002002

Dear Ms. Siegel:

Enclosed please find the analytical report for the sample(s) received by Alpha Scientific Corporation on 02-03-2020 and analyzed by the following EPA methods:

EPA 8015M (Total Petroleum Hydrocarbons)
EPA 8260B (VOCs & Oxygenates by GC/MS)

All analyses have met the QA/QC criteria of this laboratory.

The sample(s) arrived in good conditions (i.e., chilled, intact) and with a chain of custody record attached.

Alpha Scientific Corporation is a CA ELAP certified laboratory (Certificate Number 3007). Thank you for giving us the opportunity to serve you. Please feel free to call me at (562) 809-8880 if our laboratory can be of further service to you.

Sincerely,

Roger Wang, Ph. D.
Laboratory Director

Enclosures

This cover letter is an integral part of this analytical report.



Alpha Scientific Corporation

Environmental Laboratories

Client: AEI Consultants
 Project: 414659
 Project Site: 13906 Old 215 Frontage, Moreno Valley, CA
 Matrix: Soil
 Batch No. for TPH-g: AMB04-GS1
 Batch No. for TPH-d: BB05-DS1

Lab Job No.: AI002002
 Date Sampled: 02-03-2020
 Date Received: 02-03-2020
 Date Analyzed: 02-04-2020
 Date Analyzed: 02-05-2020
 Date Reported: 02-10-2020

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

Sample ID	Lab ID	DF for TPH-G	C4-C12 TPH-G	Surrog Rec.% TPH-G	DF for TPH-D&O	C13-C23 TPH-D	C24-C40 TPH-O	Surrog Rec.% TPH-D&O
MDL			0.2			5	25	
PQL			0.5			10	50	
Method Blank		1	ND	85	1	ND	ND	101
SB-5-10	AI002002-1	1	ND	85	1	ND	ND	98
SB-6-20	AI002002-2	1	ND	88	1	ND	ND	100
SB-7-2.5	AI002002-3	1	ND	86	1	ND	ND	100

* Gasoline Range TPH result is obtained from purge and trap analysis using LUFT GC/MS Method;
 MDL: Method Detection Limit;
 PQL: Practical Quantitation Limit;
 ND: Not Detected (at the specified limit);
 J: Trace concentration, result between MDL and PQL.
 Note: Surrogate recovery acceptance limits are 70-130%.



Alpha Scientific Corporation

Environmental Laboratories

Client: AEI Consultants
Project: 414659

Lab Job No.: AI002002
Matrix: Soil

Date Reported: 02-10-2020
Date Sampled: 02-03-2020

EPA 8260B (VOCs by GC/MS, Page 1 of 2)
Reporting Unit: µg/kg(ppb)

DATE ANALYZED			02-04	02-04-20	02-04-20	02-04-20		
DILUTION FACTOR (DF)			1	1	1	1		
LAB SAMPLE I.D.			MB	AI002002-1	AI002002-2	AI002002-3		
CLIENT SAMPLE I.D.				SB-5-10	SB-6-20	SB-7-2.5		
COMPOUND	MDL	PQL						
Dichlorodifluoromethane	2	5	ND	ND	ND	ND		
Chloromethane	2	5	ND	ND	ND	ND		
Vinyl Chloride	1	2	ND	ND	ND	ND		
Bromomethane	2	5	ND	ND	ND	ND		
Chloroethane	2	5	ND	ND	ND	ND		
Trichlorofluoromethane	2	5	ND	ND	ND	ND		
Freon 113	2	5	ND	ND	ND	ND		
1,1-Dichloroethene	2	5	ND	ND	ND	ND		
Iodomethane	2	5	ND	ND	ND	ND		
Methylene Chloride	5	10	ND	ND	ND	ND		
trans-1,2-Dichloroethene	2	5	ND	ND	ND	ND		
1,1-Dichloroethane	2	5	ND	ND	ND	ND		
2,2-Dichloropropane	2	5	ND	ND	ND	ND		
cis-1,2-Dichloroethene	2	5	ND	ND	ND	ND		
Bromochloromethane	2	5	ND	ND	ND	ND		
Chloroform	2	5	ND	ND	ND	ND		
1,2-Dichloroethane	1	5	ND	ND	ND	ND		
1,1,1-Trichloroethane	2	5	ND	ND	ND	ND		
Carbon tetrachloride	1	5	ND	ND	ND	ND		
1,1-Dichloropropene	2	5	ND	ND	ND	ND		
Benzene	1	2	ND	ND	ND	ND		
Trichloroethene	2	4	ND	ND	ND	ND		
1,2-Dichloropropane	2	5	ND	ND	ND	ND		
Bromodichloromethane	2	5	ND	ND	ND	ND		
Dibromomethane	2	5	ND	ND	ND	ND		
Trans-1,3-Dichloropropene	2	5	ND	ND	ND	ND		
cis-1,3-Dichloropropene	2	5	ND	ND	ND	ND		
1,1,2-Trichloroethane	2	5	ND	ND	ND	ND		
1,3-Dichloropropane	1	5	ND	ND	ND	ND		
Dibromochloromethane	2	5	ND	ND	ND	ND		
2-Chloroethylvinyl ether	2	10	ND	ND	ND	ND		
Bromoform	2	5	ND	ND	ND	ND		
Isopropylbenzene	2	5	ND	ND	ND	ND		
Bromobenzene	2	5	ND	ND	ND	ND		



Alpha Scientific Corporation

Environmental Laboratories

Client: AEI Consultants
Project: 414659

Lab Job No.: AI002002
Matrix: Soil

Date Reported: 02-10-2020
Date Sampled: 02-03-2020

EPA 8260B (VOCs & Oxygenates by GC/MS, Page 2 of 2) Reporting Unit: µg/kg(ppb)

COMPOUND	MDL	PQL	MB	SB-5-10	SB-6-20	SB-7-2.5		
Toluene	1	2	ND	ND	ND	ND		
Tetrachloroethene	2	4	ND	ND	ND	ND		
1,2-Dibromoethane(EDB)	2	5	ND	ND	ND	ND		
Chlorobenzene	2	5	ND	ND	ND	ND		
1,1,1,2-Tetrachloroethane	2	5	ND	ND	ND	ND		
Ethylbenzene	1	2	ND	ND	ND	ND		
Total Xylenes	2	4	ND	ND	ND	ND		
Styrene	2	5	ND	ND	ND	ND		
1,1,2,2-Tetrachloroethane	2	5	ND	ND	ND	ND		
1,2,3-Trichloropropane	2	5	ND	ND	ND	ND		
n-Propylbenzene	2	5	ND	ND	ND	ND		
2-Chlorotoluene	2	5	ND	ND	ND	ND		
4-Chlorotoluene	2	5	ND	ND	ND	ND		
1,3,5-Trimethylbenzene	2	5	ND	ND	ND	ND		
tert-Butylbenzene	2	5	ND	ND	ND	ND		
1,2,4-Trimethylbenzene	2	5	ND	ND	ND	ND		
Sec-Butylbenzene	2	5	ND	ND	ND	ND		
1,3-Dichlorobenzene	2	5	ND	ND	ND	ND		
p-Isopropyltoluene	2	5	ND	ND	ND	ND		
1,4-Dichlorobenzene	2	5	ND	ND	ND	ND		
1,2-Dichlorobenzene	2	5	ND	ND	ND	ND		
n-Butylbenzene	2	5	ND	ND	ND	ND		
1,2,4-Trichlorobenzene	2	5	ND	ND	ND	ND		
1,2-Dibromo-3-Chloropropane	2	5	ND	ND	ND	ND		
Hexachlorobutadiene	2	5	ND	ND	ND	ND		
Naphthalene	2	5	ND	ND	ND	ND		
1,2,3-Trichlorobenzene	2	5	ND	ND	ND	ND		
Acetone	50	100	ND	ND	ND	ND		
2-Butanone (MEK)	35	50	ND	ND	ND	ND		
4-Methyl-2-pentanone (MIBK)	35	50	ND	ND	ND	ND		
2-Hexanone	35	50	ND	ND	ND	ND		
Vinyl Acetate	35	50	ND	ND	ND	ND		
Ethanol	500	1000	ND	ND	ND	ND		
MTBE	2	5	ND	ND	ND	ND		
ETBE	2	5	ND	ND	ND	ND		
DIPE	2	5	ND	ND	ND	ND		
TAME	2	5	ND	ND	ND	ND		
T-Butyl Alcohol	20	50	ND	ND	ND	ND		
SURROGATE	Accept Limit%	%RC	%RC	%RC	%RC	%RC		
Dibromofluoro-methane	79-126	87	94	93	93	93		
Toluene-d8	79-121	96	97	87	97	97		
Bromofluoro-benzene	71-131	84	84	87	85	85		

MDL=Method Detection Limit; PQL=Practical Quantitation Limit; MB=Method Blank;
 ND=Not Detected (below DF × MDL), * Obtained from a higher dilution analysis.
 J=Trace value (between DF × MDL & DF × PQL).



02-10-2020

TPH-Gasoline
Batch QA/QC Report

Client: AEI Consultants
Project: 414659
Matrix: Soil
Batch No: AMB04-GS1

Lab Job No.: AI002002
Lab Sample I.D.: AI002002-2
Date Analyzed: 02-04-2020

I. MS/MSD Report
Unit: ppb

Analyte	Sample Conc.	Spike Conc.	MS	MSD	MS %Rec.	MSD %Rec.	% RPD	%RPD Accept. Limit	%Rec Accept. Limit
TPH-g	ND	1,000	741	901	74.1	90.1	19.5	30	70-130

II. LCS Result
Unit: ppb

Analyte	LCS Value	True Value	Rec.%	Accept. Limit
TPH-g	937	1,000	93.7	80-120

ND: Not Detected (at the specified limit).



02-10-2020

**EPA 8015M (TPH)
Batch QA/QC Report**

Client: AEI Consultants
Project: 414659
Matrix: Soil
Batch No: BB05-DS1

Lab Job No.: AI002002
Lab Sample I.D.: EA002007-28
Date Analyzed: 02-05-2020

**I. MS/MSD Report
Unit: ppm**

Analyte	Sample Conc.	Spike Conc.	MS	MSD	MS %Rec.	MSD %Rec.	% RPD	%RPD Accept. Limit	%Rec Accept. Limit
TPH-D	ND	200	182	178	91.0	89.0	2.2	30	70-130

**II. LCS Result
Unit: ppm**

Analyte	LCS Value	True Value	Rec.%	Accept. Limit
TPH-D	178	200	89.0	80-120

ND: Not Detected (at the specified limit).



02-10-2020

**EPA 8260B
Batch QA/QC Report**

Client: AEI Consultants
Project: 414659
Matrix: Soil
Batch No: 0204-VOAS1

Lab Job No.: AI002002
Lab Sample I.D.: AI002002-2
Date Analyzed: 02-04-2020

**I. MS/MSD Report
Unit: ppb**

Analyte	Sample Conc.	Spike Conc.	MS	MSD	MS %Rec.	MSD %Rec.	% RPD	%RPD Accept. Limit	%Rec Accept. Limit
1,1-Dichloroethene	ND	20	21.2	19.0	106.0	95.0	10.9	30	70-130
Benzene	ND	20	23.4	19.9	117.0	99.5	16.2	30	70-130
Trichloro-ethene	ND	20	21.8	18.6	109.0	93.0	15.8	30	70-130
Toluene	ND	20	23.1	19.6	115.5	98.0	16.4	30	70-130
Chlorobenzene	ND	20	22.4	19.4	112.0	97.0	14.4	30	70-130

**II. LCS Result
Unit: ppb**

Analyte	LCS Value	True Value	Rec.%	Accept. Limit
1,1-Dichloroethene	16.4	20.0	82.0	80-120
Benzene	19.0	20.0	95.0	80-120
Trichloro-ethene	17.8	20.0	89.0	80-120
Toluene	18.7	20.0	93.5	80-120
Chlorobenzene	18.4	20.0	92.0	80-120

ND: Not Detected (at the specified limit).



ALPHA SCIENTIFIC CORPORATION
CHAIN OF CUSTODY RECORD

Client: <u>AEI CONSULTANTS</u>						Analyses Requested							T.A.T. Requested <input type="checkbox"/> 8 hrs <input type="checkbox"/> 24 hrs <input type="checkbox"/> 48 hrs <input type="checkbox"/> 3 days <input checked="" type="checkbox"/> Normal	
Address: <u>2207 W. 190th ST TERRANCE</u>						TPH-Gasoline	TPH-Diesel, OIL	8260B (BTEX, Oxygenates)	8260B (VOCs)	8270C (SVOCs)	CAM Metals	8082 (PCBs)	Sample Condition <input checked="" type="checkbox"/> Chilled <input checked="" type="checkbox"/> Intact <input type="checkbox"/> Sample seals	
Report Attention <u>A Siegel</u>	Phone <u>562-212-5606</u>	Fax	Sampled by <u>A Siegel</u>										Remark	
Project Name/No. <u>414659</u>	Project Site <u>13906 OLD 215 FRONTAGE MORENO VALLEY</u>													
Client Sample ID	Lab Sample ID	Sample Collection		Matrix Type	Sample Preserve	No., type* & size of container								
		Date	Time											
SB-5-10	A1002002-1	2-3-20	0840	SOIL	ICE	1 sleeve	X	X		X				
SB-6-15			1024										X	
SB-6-20	-2		1034				X	X		X				
SB-7-25	-3		1110				X	X		X				
SB-7-5			1115										X	
SB-7-10			1122										X	
Relinquished by <u>Alicia Siegel</u>		Company <u>AEI CONSULTANTS</u>	Date <u>2-3-20</u>	Time <u>16:55</u>	Received by <u>[Signature]</u>	Company <u>ASC</u>	Date <u>2/3/20</u>	Time <u>16:55</u>	Container types: M=Metal Tube A=Air Bag P=Plastic bottle G=Glass bottle V=VOA vial					
Relinquished by		Company	Date	Time	Received by	Company	Date	Time						

Alpha Scientific Corporation Sample Acceptance Checklist

Section 1

Client: AEI Project: 414659 Lab Job# A1002002

Date Received: 2-3-2020

Sample(s) received in cooler(s)? Yes No (skip to Section 2)

Cooler(s) packed with: Ice Ice Packs Packing Material

Cooler Temperature (°C): #1: 4°C #2: #3: #4: #5:

(Acceptable range is 0°C to 6°C or arriving on ice for samples received on the same day as collected.)

(Ambient Temperature for vapor or air samples is acceptable).

If sample(s) received outside acceptable range, Project Manager contacted by (Personnel Initial):

Section 2	YES	NO	N/A
Was a COC received?	✓		
Were client sample IDs present?	✓		
Were sample(s) collection dates present?	✓		
Was the COC signed?	✓		
Were tests clearly indicated?	✓		
Did all samples arrive intact? If no, indicate below.	✓		
Did all container labels agree with COC?	✓		
Were correct containers used for the tests required?	✓		
Was there sufficient sample amount for requested tests?	✓		
Were the samples correctly preserved?	✓		
Was there headspace in VOA vials?			✓
Were Custody seals present?		✓	
If yes-were they intact?			✓

Section 3

Explanations/Comments:

Section 4

Was the Project Manager notified of anomalies? Yes No N/A

Via Phone: By: Date/Time

By Email: Sent to:

Project Manager's response:

Completed by: *MLG* Date: 2-3-2020

Alpha Scientific Corporation
16760 Gridley Road
Cerritos, CA 90703

Email: asc90703@gmail.com
Tel: (562) 809-8880
Fax: (562) 809-8801