
APPENDIX D14
AEI Correspondence to DO Capital – November 2022

AEI Consultants
701 Campus Square W, Suite 723A
El Segundo, California 90245
310.798.4255



November 9, 2022

Jennifer Brooks
DO Capital Group
484 South San Vicente Boulevard
Los Angeles, California 90048

**Subject: Emerald Meadows, Jurupa Valley, California
Soil Sampling Results to Riverside County Department of Environmental
Health's Comments
AEI Project No. 464653**

Dear Ms. Brooks,

At the request of DO Capital Group (the Client), AEI Consultants (AEI) has completed the *Limited Soil Sampling Investigation* dated November 2, 2022 at the above-referenced property ("Project") (Enclosure). The Riverside County Department of Environmental Health (DEH) requested the sampling investigation in an email dated September 27, 2022 and during a meeting on October 7, 2022 between representatives from the DEH, DO Capital Group, AEI, and the City of Jurupa Valley. The DEH requested soil sampling to determine if potential historical agricultural use has impacted the shallow subsurface at the Site. The DEH also requested to collect soil samples from identified stockpiles and to collect a soil sample from discolored soil adjacent to two (2) 55-gallon drums at the Site and two soil samples from the contents of the drums.

The DEH was notified of the sampling event in a letter dated October 9, 2022 which was approved on October 28, 2022.

The scope of work for this investigation was designed in accordance with the protocols described in the California Department of Toxic Substance Control's (DTSC) *Interim Guidance for Sampling Agricultural Properties (Third Revision) (Interim Guidance)* dated August 7, 2008 and the *Information Advisory on Clean Imported Fill Material (Advisory)* dated October 2001.

Agricultural Soil Sampling

AEI assumed the undisturbed previous agricultural land area is approximately 24.5 acres. Per the DTSC's Interim Guidance, AEI collected 35 shallow soil samples equally spaced which were laboratory-composited into 9 soil samples at a California state-certified laboratory. The nine (9) separate sampling areas (Comp-1 through Comp-9) were evenly spaced across the southwestern portion of the Site. Soil samples were collected from clear, accessible areas within the Site. Four (4) samples collected from Comp-1 through Comp-8, and three (3) samples from Comp-9 were collected discretely and one duplicate sample was collected from area Comp-9 (Comp-Dup). Select discrete samples, one from each area (AS-1 through AS-9) were analyzed for arsenic, including one discrete duplicate sample (AS-Dup) collected from AS-9.

Stockpile Soil Sampling

AEI assumed approximately 920 cubic yards of soil are located at the western group of stockpiles and 1,500 cubic yards of soil are located at the eastern group of stockpiles. Per the DTSC Advisory, AEI collected seven (7) discrete soil samples from randomly selected stockpiles for analysis. Since the origin of the stockpiles is unknown, AEI analyzed for all constituents listed in the Advisory.

Drum Soil and Contents Sampling

AEI collected one (1) soil sample from the discolored soil adjacent to the drums (Drum-1) and two (2) soil samples from the contents of the two drums (Drum-2 and Drum-3). The soil samples were collected using clean laboratory-provided glass jars. The area of the discolored surface soil extended approximately 3-feet by 3-feet.

Results

The results are summarized as follows:

Agricultural Soil Sampling

- Organochlorine pesticides (OCPs) were not detected at concentrations above the laboratory method detection limits (MDLs) in the soil samples collected and analyzed.
- Arsenic was detected in the nine discrete samples and the one duplicate at a maximum concentration of 7.3 milligram per kilogram (mg/kg) (AS-9), above the direct contact commercial/industrial environmental screening level (ESL) of 0.31 mg/kg, however below the maximum California background concentration of 11.0 mg/kg.

Stockpile Soil Sampling

- Total petroleum hydrocarbons (TPH) carbon chain, volatile organic compounds (VOCs), semi-volatile organic compounds, polynuclear aromatic hydrocarbons, polychlorinated biphenyls, OCPs, organophosphorus pesticides, chlorinated herbicides, and Title 22 metals were not detected at concentrations above their respective direct contact commercial/industrial ESLs, laboratory MDLs, and/or maximum California background concentrations in the seven (7) stockpile soil samples.
- No visible asbestos were detected in the seven (7) stockpile soil samples.

Drum Soil and Contents Sampling

- TPH carbon chain, VOCs, and Title-22 metals were not detected at concentrations above their respective direct contact commercial/industrial ESLs, or laboratory MDLs, and/or maximum California background concentrations in the three (3) soil samples collected, with the exception of lead.
- Lead was detected in the three soil samples at concentrations of 687 mg/kg (Drum-1), 1,430 mg/kg (Drum-2), and 1,290 mg/kg (Drum-3), above the direct contact commercial/industrial ESL of 380 mg/kg and the maximum California background concentration of 97.1 mg/kg. The concentrations of lead also exceed the California Total Threshold Limit Concentrations (TTLC) as described in Title 22 California Code of Regulations (CCR), Division 4.5, Chapter 11 § 66261.113 for disposal of 1,000 mg/kg in the two drum content samples.

AEI recommends analyzing Drum-2 and Drum-3 samples for California Toxicity Characteristic Leaching Procedure (TCLP) and Soluble Threshold Limit Concentration (STLC) in accordance with the Federal Resource Conservation and Recovery Act (RCRA) of 1972 to determine waste disposal characterization. AEI also recommends excavating the discolored soil for disposal at a proper receiving facility.

Based on the results of this investigation, no other assessment is warranted at this time.

AEI appreciates the opportunity to be of service. If you have any questions or comments, please do not hesitate to contact Mr. Adam Bennet at 310.798.4255, abennett@aeiconsultants.com, or the undersigned.

Sincerely,



Adam Bennett
Senior Vice President



Kate Lamb
Senior Project Manager

AEI Consultants
701 Campus Square W, Suite 723A
El Segundo, California 90245

Enclosed: AEI's *Limited Soil Sampling Investigation* dated November 2, 2022