



# GROUP DELTA

**LSA**

1500 Iowa Avenue, Suite 200  
Riverside, CA 92507

October 7, 2021  
Project No. EN8168

**Attention:** Dionisios Glentis, Senior Environmental Planner

**Subject:** Environmental Due Diligence Review

First Hathaway  
Banning, California

Dear Mr. Glentis,

Group Delta Consultants, Inc. (Group Delta) is pleased to submit to LSA this Environmental Due Diligence Review for the proposed Banning Industrial Park development located at 600 North Hathaway Street, Banning, California (Site). In conducting this review, Group Delta reviewed a Phase I Environmental Site Assessment (ESA) report prepared for the Site by Weis Environmental, dated March 26, 2021.

## PROJECT DESCRIPTION

Based on information provided in the Phase I ESA, it is our understanding the Site consists of approximately 95.04 acres of land located at 600 North Hathaway Street. The Site is identified by Riverside County Assessor's Parcel Numbers (APNs) 532-110-001, 532-110-002, 532-110-003, 532-110-008, 532-110-009, and 532-110-010. As of March 1, 2021, the Site contained two structures, one approximately 4,400-square-foot commercial building in the northwestern portion and one approximately 100-square-foot shack in the southeastern portion. The remainder of the Site is vacant land that appears to have undergone extensive grading activities at APNs 532-110-003, 532-110-008, 532-110-009, and 532-110-010.

## DUE DILIGENCE REVIEW

### Phase I ESA Scope

A Phase I ESA report was prepared for the Site by Weis Environmental (Weis) and dated March 26, 2021. It is reported that the Phase I ESA was developed in conformance with the provisions of American Society for Testing and Materials (ASTM) Practice E 1527-13 and the Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312). The 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.

The purpose of the Phase I ESA is to review, evaluate, and document present and past land use and practices, and visually examine Site conditions in order to identify Recognized Environmental Conditions (RECs). The term REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment, or; (3) under conditions that pose a material threat of a future release to the environment.

Based upon the review of the Phase I ESA, it appears that requirements of ASTM Practice E 1527-13 and the EPA Standards and Practices for AAI (40 CFR Part 312) were addressed in the report.

### **Site History**

Weis reviewed various historical records during preparation of the Phase I. Notable land uses and conclusions provided in the Phase I are summarized below:

- From approximately 1936 to 1975, the Site was formerly vacant and undeveloped land. By 1985, the Site was developed with several industrial structures in the northwestern portion of the Site along North Hathaway Street. The remainder of the Site remained vacant and undeveloped land until 2016, with evidence of grading visible in the 2012 aerial photograph. The Site was occupied by Fred Lite Blocks from 1981 to 1986, and by Orco Block Company from 1991 to 2011. One 8,000-gallon gasoline underground storage tank (UST) and one 8,000-gallon diesel UST were used on Site by Fred Lite Blocks and are discussed further below in the Phase II ESA section.
- No significant off-site land uses or releases were identified by Weis that were determined to pose a risk to the subject property.

### **Site Observations**

Weis visited the Site on March 1, 2021, during preparation of the Phase I. Notable observations and conclusions provided in the Phase I are summarized below with text borrowed directly from the Phase I ESA:

The Site and the surrounding vicinity are situated in the City of Banning that consists primarily of residential properties, commercial properties, vacant land and public roadways. The Morongo Indian Reservation is present to the north. The Site is predominantly vacant and undeveloped land. Remnant improvements of the Orco facility (i.e., building, paving, former building slabs, etc.) are present in the northwest portion of the Site. The 532-110-003, -008, -009 and -010 parcels appear to have undergone extensive former grading activities. The current use of the Site and adjoining properties are not ones that are indicative of the use, treatment, storage disposal or generation of hazardous substances or petroleum products that may have significantly impacted the Site.

There are two primary structures at the Site. An approximately 4,400 square foot commercial building formerly utilized by Orco is present in the northwest portion of the Site. The building is constructed of concrete masonry unit on a concrete slab on grade foundation. Other improvements in this portion of the Site include concrete and asphalt paving, former concrete building slabs, block walls and indicators/infrastructure associated with several utility systems (i.e., high pressure natural gas, fiber optic, electrical and others). An approximately 100 square foot shack is present in the southeast portion of the Site. The structure appears to be wood framed and constructed on a concrete slab. The previously graded areas of the Site also contain significant drainage related infrastructure including basins with associated piping and other improvements. Storm drain inlets, hydrants, concrete drainage swales, various piping and other features are also present in these areas. Power poles and line are also present in select areas of the Site.

Significant drainage related infrastructure including basins with associated piping and other improvements is present at the Site, which is associated with a former planned retail development that was never completed. In addition, an underground, concrete lined pit is present at the northeast corner of the primary Site building. In addition, a concrete lined pit (top elevated above the floor) and trench are present within the primary Site building. Visible portions of the pits did not contain drains. The use of the pits is assumed to be part of the general former block production operations. No staining, odors or other suspect conditions were noted in these areas.

### **Regulatory Agency File Reviews**

According to files provided by the California State Water Resources Control Board (SWRCB), two 8,000-gallon USTs, one for the storage of gasoline and the other for the storage of diesel fuel, were used by Fred Lite Blocks at 600 North Hathaway Street. The USTs were listed as “removed.”

According to files provided by the Riverside County Department of Environmental Health (DEH), documentation of the removal of the two 8,000-gallon USTs was documented and is summarized below with text borrowed directly from the Phase I ESA:

The USTs were removed on February 8, 1994 and documented in a report dated February 17, 1994. It was estimated that the two 8,000-gallon USTs were installed in the 1960s. As directed by the DEH, two soil samples were collected from each end of the former UST locations, for a total of eight samples. The samples were analyzed for petroleum hydrocarbons and/or select volatile organic compounds (VOCs). The four samples that were analyzed for gasoline range hydrocarbons and select VOCs did not contain such constituents above the laboratory reporting limits. Of the four samples that were analyzed for diesel range hydrocarbons, one contained diesel at 31 milligrams per kilogram (mg/kg). The sample depth was 14 feet below the surface. The diesel screening level at the time was noted as ranging from 100 mg/kg to 10,000 mg/kg depending on property conditions. The current conservative screening levels for diesel in a

residential and commercial/industrial setting are 260 mg/kg and 1,200 mg/kg, respectively. Also of note is the sample one foot below the 31 mg/kg detection did not contain diesel range hydrocarbons. The DEH issued a no further action letter for the USTs on March 17, 1994.

## Phase II ESA

A Phase II ESA was conducted concurrently with the Phase I ESA. Notable observations and conclusions provided in the Phase II are summarized below with text borrowed directly from the Phase II ESA:

Fifteen soil borings (identified as B1 through B15) were advanced at the Site on April 29, 2021. The borings were drilled to depths varying from 10 to 20 feet. Boring B10 was drilled in the area of the former USTs. Remaining borings were drilled within former structure or operations areas of the former Orco facility (B1 through B10) or along the periphery of the former facility in areas of possible fill material and/or materials storage (B11 through B15).

Soil samples were collected at one foot and at five foot vertical depth increments to the total depth of each boring. A total of 52 soil samples were obtained during the drilling activities. American Environmental Testing Laboratory (AETL) completed the following analytical laboratory testing on the samples:

- Thirty-three (33) soil samples were analyzed for total petroleum hydrocarbons (TPH) by United States Environmental Protection Agency (EPA) test Method 8015B.
- Twenty-seven (27) soil samples were analyzed for volatile organic compounds (VOCs) by United States EPA test Method 8260B.
- Sixteen (16) soil samples were analyzed for Title 22 Metals by United States EPA test Methods 6010B/7471A.

TPH in the gasoline range was not detected in any of the samples. TPH as diesel was detected at 72.5 mg/kg and 330 mg/kg at the one foot depths of borings B5 and B9, respectively. TPH as oil was also detected at these sample depths and locations at concentrations of 1,880 mg/kg (B5) and 241 mg/kg (B9) in addition to the one foot depth of boring B6 (17.8 mg/kg). TPH was not detected in underlying soils (i.e., greater depths) at each of these three sampling locations. The detected diesel and oil concentrations are below their respective residential and commercial human health risk based screening levels, with the exception of TPH as diesel detected in boring B9 at a concentration of 330 mg/kg, which is slightly above the residential screening level of 260 mg/kg and below the commercial screening level of 1,200 mg/kg.

VOCs were not detected at or above the laboratory reporting limits in any of the soil samples analyzed for such constituents.

Eight (8) of the Title 22 Metals were detected at or above analytical laboratory reporting limits. The detected metals (and maximum concentrations) included barium (433 mg/kg), chromium (26.4 mg/kg), cobalt (11.9 mg/kg), copper (79.4 mg/kg), lead (7.77 mg/kg), nickel (17.8 mg/kg), vanadium (51.2 mg/kg) and zinc (58.0 mg/kg). None of the detected metals concentrations exceed their respective residential and commercial human health risk based screening levels.

Conclusions of the Phase II ESA are as follows:

- Insignificant detections of diesel and oil range hydrocarbons were identified in three of the soil samples at one foot depths. No further petroleum impacts were detected in underlying soils at each of these three sampling locations. Furthermore, the impacts are surficial in nature and do not require additional action.
- VOCs and metals are not considered to be contaminants of concern at the Site. VOCs were not detected at or above analytical laboratory reporting limits, and none of the detected metal concentration exceed their respective residential and commercial human health risk based screening levels.
- No petroleum impacts were identified in the area of the former USTs.
- No additional assessment is considered to be warranted.

Group Delta concurs with Weis's conclusions regarding the soils assessment in the vicinity of the former USTs.

### **Asbestos and Lead Survey**

An Asbestos and Lead Survey at 600 North Hathaway Street in Banning, California, was performed by Weis and dated May 26, 2021. A total of thirty-three (33) asbestos bulk samples were collected from the Site structures during asbestos sampling activities. The samples were analyzed for asbestos content via PLM by Eurofins CEI Laboratory of Cary, North Carolina. Twenty (20) XRF readings were obtained at the Site structures in order to properly assess painted surfaces potentially containing lead. No asbestos-containing materials or lead-based paint were identified during the completion of the survey.

### **Phase I ESA Conclusion and Recommendations**

The Phase I ESA identified the former presence of two 8,000-gallon USTs at the Site to be a historical recognized environmental condition (HREC), based on the No Further Action (NFA) letter issued by Riverside County DEH for the USTs. Group Delta is in general agreement with these findings. Group Delta also reviewed readily available online databases including the Department of Toxic Substances Control's (DTSC's) Envirostor database and the State Water

Resources Control Board's (SWRCB's) Geotracker database and the results of that review corroborate this finding.

## CONCLUSIONS

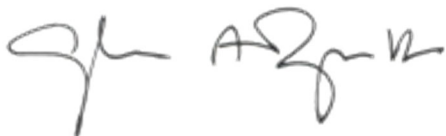
Group Delta has reviewed the Phase I ESA and Phase II ESA reports prepared by Weis and dated March 26, 2021 and May 26, 2021, respectively. The purpose of this peer review is to evaluate the adherence of the Phase I ESA report with relevant guidance documents. Based upon the review of this report, Group Delta is in general agreement with the conclusion that an HREC was identified per ASTM Practice E 1527-13 and the EPA Standards and Practices for AAI (40 CFR Part 312). Additionally, Group Delta concurs with Weis's conclusions regarding the Phase II ESA soils investigation in the vicinity of the former USTs.

As is the case with Phase I ESAs, the finding of no RECs or controlled recognized environmental conditions (CRECs) through research and observation does not necessarily preclude the presence of released hazardous materials or petroleum products on a property from onsite or offsite sources. Previous industrial land uses still have the potential to have been a source of hazardous materials at the Site.

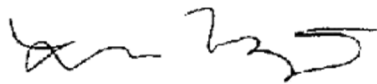
## CLOSING

Thank you for allowing Group Delta to be your consultants on this project. Please feel free to call us at 949-450-2100 if you have any questions on the contents of this letter.

Sincerely,  
**Group Delta**



Glenn Burks, Ph. D., P.E.  
Director of Environ. Services



Laura Botzong  
Project Manager