Leighton Consulting, Inc., (Leighton) presents this Soil Management Plan (SMP) prepared for the proposed hotel development project located at 516 La Costa Avenue, Encinitas, California (Figure 1, Site Location Map). This SMP outlines the protocols and approaches for the proposed construction activities within the project area as it relates to the identification and management of contaminated soil.

If you have any questions regarding this report, please contact the undersigned at (858) 300-8495.

Respectfully submitted,

LEIGHTON CONSULTING, INC.

Brian Pierce, PG
Project Geologist
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1.0 INTRODUCTION

Leighton has prepared this Soil Management Plan (SMP) to describe the technical approach to be utilized during excavation, characterization, handling, stockpiling, transportation, disposal and monitoring of soil material impacted with chemicals of concern (COCs) that may be encountered during grading and construction activities at the proposed hotel development project located at 516 La Costa Avenue, in the city of Encinitas, San Diego County, California (referred to as the “Site”, Figure 1).

The development plan is for a new, two-story hotel with associated accessory structures, parking areas, hardscape, and landscape improvements. Based on the preliminary grading plan (Pasco Laret Suter and Associates, 2018), up to 1,680 cubic yards of soil will need to be exported from the Site to facilitate the proposed development.

This SMP includes procedures for handling soils impacted by organochlorine pesticides (OCPs), or previously unidentified COCs, should they be encountered during grading and redevelopment. The SMP also describes the confirmation soil sampling protocol to be used to determine the limits of remedial excavations in the event that COCs exceeding screening levels for commercial soil are exceeded. The objectives of this SMP are to:

- Facilitate the safest, most efficient, and cost-effective method for excavation, handling, temporary stockpiling, and disposal of soil where concentrations of OCPs, or other COCs exceed reuse cleanup levels; and
- Outline procedures for the excavation, handling, temporary stockpiling, and/or reuse/disposal of previously unidentified impacted soil materials, should they be encountered, during Site excavation activities.

The goals of this SMP are to:

- Provide cleanup guidelines, standards, and procedures for handling OCP-impacted soils.
- Provide cleanup guidelines, standards, and procedures for handling previously unidentified impacted soil materials, should they be encountered.
- Protect the public, onsite workers, the environment, and future users of the proposed project area during, and upon completion of planned construction activities.

This SMP has been prepared in general accordance with the County of San Diego Department of Environmental Health (SDDEH) Site Assessment and Mitigation (SAM) Manual (SDDEH, 2004).
2.0 BACKGROUND

2.1 Site Information

The Site is located at the address of 516 La Costa Avenue, Encinitas, California 92024. The County of San Diego Assessor’s office identifies the Site as Assessor Parcel Number (APN) 216-030-48-00. Currently, the Site consists of a 1.19-acre parcel of commercial land that is vacant.

Historically, the Site was vacant, undeveloped land. The Site was developed in the 1930s for agricultural use and a single-family residence. In the 1960s agricultural activities ceased and the single-family residence was demolished in 1992. Hensen & Sons Glass and Mirror operated at the Site from approximately 1992 until 2014 and a nursery operated at the Site from approximately 2016 to early 2018.

The Site is bordered to the east by La Costa Chevron, to the north by Interstate 5 and Batiquitos Lagoon; to the south by La Costa Avenue and residences, and to the west by former greenhouses and residences.

2.2 Phase I and Phase II Environmental Site Assessments (ESAs)

Leighton Consulting, Inc. (Leighton), performed a limited Phase II ESA for the Site based on the findings of our Phase I ESA (Leighton, 2017) that identified the following recognized environmental conditions (RECs):

- Historical agricultural site use may have resulted in organochlorine pesticide (OCP) impacts to shallow soils (<3 ft.) at the Site.
- Leaking underground storage tanks (USTs) at the adjacent La Costa Chevron may have resulted in a vapor encroachment concern at the Site.
- Undocumented fill soils are present on the northern slope of the Site that may contain chemicals of concern (CoCs).

Soil Sampling

On October 13, 2017 and December 4, 2018, Leighton personnel advanced a total of eight hand auger borings (LB-1 through LB-8) to a maximum depth of 3.0 feet bgs at the Site. Soil samples were collected from each of the hand auger boring locations at 0.5, 1.5 feet and 3.0 feet bgs. In addition, two soil samples (SP-1 and SP-2) were collected from imported stockpiles at the northern margin of the Site. The location of soil samples collected is depicted on Figure 2.
A total of 22 soil samples were collected from the eight hand auger borings (LB-1 through LB-8) and analyzed for Organochlorine Pesticides (OCPs) by EPA Method 8081.

OCPs were detected in 15 of the 22 soil samples collected at the Site.

- Chlordane was detected in three samples at a maximum concentration of 340 micrograms per kilogram (µg/kg; SP-2), which is below the Department of Toxic Substances Control’s (DTSC) modified soil screening level (DTSC-SL) for commercial/industrial soil of 1,500 µg/kg.
- 4,4’-DDD was detected in six of the 22 soil samples collected at a maximum concentration of 280 µg/kg, which is below the EPA Region 9 Regional Screening Levels (RSLs) for commercial/industrial soil of 9,600 µg/kg.
- 4,4’-DDE was detected in 15 of the 22 soil samples collected at a maximum concentration of 590 (µg/kg), which is below the RSL for commercial/industrial soil of 9,300 (µg/kg).
- 4,4’-DDT was detected in five of the 22 soil samples collected at a maximum concentration of 44 µg/kg, which is below the RSL for commercial/industrial soil of 8,500 µg/kg.
- Dieldrin was detected in three of the 22 soil samples collected at a maximum concentration of 22 µg/kg, which is below the RSL for commercial/industrial soil of 140 µg/kg.
- Heptachlor epoxide was detected in two of the 22 soil samples collected at a maximum concentration of 15 µg/kg, which is below the RSL for commercial/industrial soil of 330 µg/kg.

The two soil samples collected from the stockpiles on the northern slope of the Site were also analyzed for TPH and Title 22 Metals.

- TPH was detected in soil sample SP-2 (Figure 2) at a low concentration of 26 mg/kg (Table 2).
- Title 22 Metals were below their respective RSLs for commercial/industrial soil and were consistent with background levels for southern California soils (Table 2).

The soil sample analytical results for OCPs and TPH-Title 22 Metals are summarized in Table 1 and 2, respectively. The locations of the hand auger borings and stockpile soil samples collected are depicted on Figure 2.
Soil Vapor Survey

On October 18, 2017, Leighton directed the advancement and installation of four temporary, dual-nested soil vapor wells at the Site (Figure 2) by H&P Mobile Geochemistry (H&P) of Carlsbad, California, a State of California licensed driller. A total of nine soil vapor samples (including field duplicate) were collected from 5 and 15 feet bgs. The results of the soil vapor survey indicated:

- Gasoline constituents were not detected above the laboratory reporting limits in the soil vapor samples analyzed.
- Chloroform was detected in two samples (SV-2-15 and SV-2-15-REP) at a concentration 0.20 micrograms per liter (µg/L), which is below RSL for commercial/industrial air of 0.53 µg/L.

The soil vapor analytical results are summarized in Table 3, the locations of the soil vapor probe locations are depicted on Figure 2.

Based on the results of the soil vapor samples collected at the Site, vapor encroachment is not considered a REC for the Site.
3.0 HAZARD ASSESSMENT

Previous investigations that have taken place at the Site have identified the presence of OCPs in shallow soils at the Site. The detected concentrations of OCPs were all below their respective RSLs for commercial/industrial soil and therefore have a low potential to adversely affect the human health of construction workers, end users, or the general public at or near the Site. However, shallow soils at the Site are not suitable for offsite reuse and should be treated as a regulated waste if soil export is contemplated.

It is possible that previously unidentified soil impacts (i.e. stained or odorous soils) could be encountered during grading activities. In the event that new impacts are encountered, Site work should be halted immediately, the area of suspected contamination should be barricaded, access should be restricted from the area, and Leighton and dasMod should be called in to assess the situation.

To avoid potentially lengthy delays from newly discovered impacts (if any), Tier 1 Soil Screening Levels (SSLs) from the California Regional Water Quality Control Board – San Diego Region (SDRWQCB) Conditional Waiver for Waste Discharge Requirements for Low-Threat Discharges in the San Diego Region (Order No. R9-2014-0041) will be utilized as the clean-up goals for the Site. Prior to exporting soil characterized as Tier 1 Soil (i.e. inert), dasMod will be submitting a Notice of Intent (NOI) to SDRWCQB in order to receive enrollment in Conditional Waiver No 10 – Discharges/Disposal of Solid Waste to Land (Solid Waste Waiver).

- Soils cannot contain any detectable concentrations of organic contaminants (e.g. TPH or VOCs).
- For Title 22 Metals (i.e. lead, mercury, etc.), the detected concentrations will be compared to the Tier 1 SSLs for unrestricted use in San Diego County.

Soils not meeting the Solid Waste Waiver Tier 1 or Tier 2 SSLs will require disposal at a landfill permitted to accept the waste.
4.0 HEALTH AND SAFETY

4.1 Site Specific Health and Safety

A site-specific Health and Safety Plan (HSP) will be prepared by the contractor for the proposed work and will be reviewed by all workers prior to initiating any intrusive work that may be performed at the Site. The HSP should incorporate the requirements specified by Cal-OSHA Hazardous Waste Operations Standards (Title 29 CFR, Section 1910.120) and California Code of Regulations (Title 8 CCR, Section 5192). The HSP should also outline the anticipated physical and chemical hazards that may be encountered at the Site.

Following the determination that regulated or hazardous materials are present at the Site, the Contractor will be responsible for ensuring that appropriately trained personnel are onsite and available to actively monitor soil that will be exposed during the construction activities and implement all of the recommendations of the HSP. The Contractor will hold daily safety meetings to discuss potential hazards at the beginning of each workday, when new personnel are introduced to the project, and when new Site conditions warrant such meetings. These meetings will, at a minimum, include identification and discussion of potential workplace hazards and problems so that appropriate control measures can be implemented. Field activities will be performed in accordance with the safety protocols established in the HSP. The potential for serious injuries can be reduced by holding daily safety meetings to promote worker awareness.

4.2 Community Health and Safety

The area surrounding the Site is a busy urban environment, traffic and associated Site access control will need to be enforced. It is anticipated that the Site will be fenced, and access will be limited to authorized personnel only. Based on the COCs identified at the Site, the primary health and safety issue associated with the planned remedial excavation activities under this SMP will be the proper control of dust during excavation of OCP impacted soils.

The Contractor will comply with the San Diego Air Pollution Control District (APCD) Rule 55 for dust control which requires that there be no discharges of visible dust emissions in the atmosphere beyond the property line of a construction site for a period aggregating more than 3 minutes in any 60-minute period. In addition, the Contractor will implement the following controls to prevent contaminated soil
and/or dust from leaving the Site as it pertains to Community Health and Safety and APCD Rule 55:

- Minimize Track-Out/Carry-Out as vehicles enter and leave the Site (See Sections 5.2 and 5.7);
- Stockpile Engineering Controls (See Section 5.5); and
- Dust Control (See Section 5.6)
5.0  SOIL CONTROL

5.1  Proposed Site Use

Project improvements within the Site area will consist of the construction of a two-story boutique hotel with associated improvements. Soil will be disturbed during grading activities within the project area. It is anticipated that any impacted soils proposed to be exported will be stockpiled onsite and profiled prior to disposal. The guidelines described below shall be used to coordinate the handling, storage, and disposal of OCP-impacted soil, or other contaminated materials, should they be encountered.

5.2  Expected Subsurface Site Work

Based on the Preliminary Geotechnical Investigation Report (Engineering Design Group, 2018) and Preliminary Grading Plan (Pasco, Laret, Suiter & Associates, 2018), grading activities related to the redevelopment of the Site are anticipated to include:

- Excavation of up to 3-4 (vertical) feet of soil and recompaclion below the proposed structure.
- Excavation of 12 (vertical) inches of soil and recompaclion in areas of exterior flatwork, parking, and driveways.
- Potential export of up to 1,680 cubic yards of soil.

During grading activities, if export is anticipated or if contaminated soils are discovered during excavation, the excavated impacted soil will be stockpiled and maintained in accordance with the provisions of Section 5.7 below. Based on the previous investigations at the Site, soils excavated during grading operations for the proposed commercial structure are suitable for onsite reuse.

5.3  Excavation of Previously Unidentified Impacted Soils

If areas of odorous, stained, or discolored soils are encountered, all excavation and construction work should be halted in the potentially impacted area and the contractor will relocate all non-essential personnel to an area that is up-wind of the work area. All potential ignition sources will be turned off and/or removed from the work area. The contractor will immediately apply a mist of water over the impacted area to mitigate the release of vapors. Water will be available for this purpose at all times. Site personnel should refrain from applying amounts of water that would
cause run-off or spread of contamination. Any proposed export soils within that area suspected to be impacted with COCs should be considered a potentially hazardous waste until analytical results determine otherwise. Construction supervisors, dasMod and Leighton should be notified immediately after encountering and controlling potentially hazardous situations.

5.4 Decontamination Areas

The Contractor must construct a decontamination pad for trucks transporting impacted soil, construction equipment, non-disposable field equipment, and personnel at the Site. The decontamination zone should be lined with plastic sheeting, or an impervious surface, to collect soil or debris that may accumulate. To the extent practical, loose soil or debris will be removed from the tires, beds, cabs, and rails of trucks that are utilized to transport impacted soil or debris prior to leaving the work area.

All non-disposable equipment that has come in contact with impacted soil will be dry-decontaminated using chisels, scrapers, shovels, brooms, and/or hand-held brushes as necessary. Dry decontamination will take place in a pre-designated area that has been covered with plastic sheeting. The Contractor shall collect and dispose of solids removed during decontamination (such as soil and/or debris) at an appropriately permitted disposal facility.

Any wastewater generated from decontamination activities during the completion of the proposed scope of work will be properly containerized, profiled, and disposed of at an appropriately permitted disposal facility.

5.5 Dewatering

Groundwater is not anticipated to be encountered during construction activities at the Site.

5.6 Unidentified Impacts Confirmation Soil Sampling

If previously unidentified impacts are encountered at the Site, confirmation soil samples will be collected from the sidewalls and the bottom of each excavated area to confirm the removal of contaminated soil to concentrations below accepted regulatory screening levels (RSLs for commercial soil and Tier 1 SSLs). The soil samples will be collected in laboratory supplied glass jars and will be analyzed for the suspected chemical(s) of concern (CoC).
At a minimum, soil samples will be obtained at a frequency of one per 20 linear feet along the sidewalls and excavation bottom. If CoCs are detected in any confirmation sample at a concentration greater than the relevant screening level, the excavation will be extended in the direction of the contamination, and another set of confirmation samples will be collected and analyzed. This process will continue until all confirmation samples indicate that impacted soils with concentrations greater than the relevant screening level have been removed from the affected areas for placement into a stockpile for profiling.

5.7 Engineering Controls for Stockpiled Soil

The following engineering controls should be implemented for stockpiled soil:

- Place on a relatively impervious surface such as covered asphalt, concrete, or plastic sheeting.
- Moisten to minimize dust emissions during stockpiling (no runoff is to be created during this process).
- Construct and maintain the stockpile in a manner that prevents surface and rainwater from entering the stockpile and minimizes vapor emissions.
- Secure covering with heavy plastic sheeting to minimize vapor and dust emissions and to prevent runoff from rain (sheeting must be maintained in good condition).
- Remove stockpiled soil in a timely manner after excavation to avoid nuisance complaints. Any stockpiled soil demonstrated by sampling and laboratory analysis, or determined by the generator to be hazardous waste, must be stored in accordance with hazardous waste regulations, and removed within 90 days of excavation.

In addition to the guidelines provided above, stormwater Best Management Practices (BMPs) must be incorporated into soil management procedures. BMPs are used to effectively control stormwater run-on and run-off from stockpiled soil. BMPs can include the following measures and should be implemented in accordance with the general site construction plans and are the responsibility of the general contractor:

- Locate stockpiles away from concentrated flows of stormwater, drainage courses, and inlets.
- Protect all stockpiles from stormwater run-on using a temporary perimeter sediment barrier such as berms, dikes, silt fences or gravel bag barriers.
- Implement wind erosion control practices as appropriate on all stockpiled material.
- Proper implementation of a Storm Water Pollution Prevention Plan (SWPPP).

5.8 Stockpile Soil Sampling Procedure

The following stockpile soil sample protocol will be followed in the event that previously unidentified contaminants are discovered during construction activities:

1. The stockpiled soil may be assessed to determine suitability for onsite reuse or offsite disposal. The number of samples collected to determine suitability for onsite reuse must comply with the United States Environmental Protection Agency Publication SW-846 (SW-846) as described below. The stockpile samples will be delivered to a California certified laboratory. Based on the analytical results, Leighton will then make a determination whether the stockpiled soil can be reused onsite or will need to be transported offsite to an approved disposal facility under the appropriate waste manifest/bill of laden.

2. Procedures in SW-846 provide a method for determining the mean analyses required to meet the confidence levels provided in SW-846; therefore, archiving of samples may be appropriate. Archived samples must be appropriately preserved and analyzed within the maximum holding time specified in SW-846.

Note that it is not necessary to consider each individual stockpile separately. At the discretion of Leighton, stockpiles expected to contain similar contaminant conditions can be considered part of the same soil mass for the purpose of SW-846 sampling. The minimum number of discrete samples initially required is given below:

- Stockpiles less than 10 cubic yards: a minimum of two (2) samples must be collected, one from each half of the stockpile. Select sample points randomly within each half.
- Stockpiles from 10-20 cubic yards: a minimum of three (3) samples must be collected, one from each third of the stockpile. Select sample points randomly within each third.
Stockpiles from 20-100 cubic yards: a minimum of four (4) samples must be collected, one from each quarter of the stockpile. Select sample points randomly within each quarter.

Stockpiles from 100-500 cubic yards: a minimum of one (1) sample for each 25 cubic yards or portion must be collected (e.g., a 130-cubic yard stockpile would require 6 samples). Section the stockpile into 25-cubic yard portions and obtain a minimum of one (1) sample from each 25-cubic yard portion. Select sample points randomly within each 25-cubic yard portion of the stockpile.

Stockpiles over 500 cubic yards: same procedure as for stockpiles from 100-500 cubic yards except add one (1) sample per each 500 cubic yards above 500 cubic yards.

3. Random sample points must be selected from locations on a three-dimensional grid. The presence of materials such as boulders, debris, etc., may make strict application of this requirement impractical. In such cases, it is appropriate to obtain the sample as close as possible to the randomly selected point without altering the spirit of the random selection process. Sample collection in either metal tubes or glass jars is acceptable, provided every effort is made to minimize the loss of volatile constituents. Containers should be completely filled, capped, and placed on ice immediately.

4. Stockpiled soil that is designated for profiling and offsite disposal to a permitted hazardous waste or specified waste facility, or to a treatment/recycling facility, must be sampled and analyzed in accordance with the receiving facility's requirements. Copies of all laboratory data and hazardous waste manifests, or other transportation documents generated for the soil treatment or disposal must be filed to demonstrate the proper handling and disposal of the contaminated soil. The assumed profiling protocol for offsite disposal, which may be met by direct sampling of the soil stockpiles, is given below:

For suspected disposal as, nonhazardous waste:

- Four samples per one hundred cubic yards up to 500 cubic yards;
- One sample per 500 cubic yards up to 5,000 cubic yards (i.e. 1,000 cubic yards = 21 samples).

For suspected disposal as a California (non-RCRA) hazardous waste:
- 1-10 cubic yards = 2 samples;
- 11-20 cubic yards = 3 samples;
- 20-100 cubic yards = 4 samples;
- 100-500 cubic yards = 1 sample per 25 cubic yards (10 sample maximum);
- 500-10,000 cubic yards = 10 samples, plus 1 sample for every 500 cubic yards over 500.

5. Information on stockpiled soil evaluation must include the following:

- An estimate of the volume of contaminated soil involved;
- A description of the contaminant (e.g., heavy metals, OCPs, petroleum hydrocarbons);
- A description of the sampling methodology and the sample location/selection process;
- A plot plan detailing the stockpile and sample locations;
- A copy of all sample results, chain of custody documents, and QA/QC supporting data.

5.9 Dust Control

Excavation, transportation, placement, and handling of material containing OCPs or other contaminants shall result in no visible dust migration. A water truck or tank (provided by the Contractor) will be on the job site at all times during grading operations in work areas containing OCP-impacted soils.
6.0 SOIL IMPORT

Bulk soil import is not planned for this project. Therefore, no guidelines for soil import are provided in this SMP.
7.0 WASTE DISPOSAL

Contaminated soil in the project area determined to be a regulated waste or California (non-RCRA) Hazardous Waste must be disposed offsite at the below permitted receiving facility or other similarly permitted facilities

Nonhazardous Waste: Otay Landfill
1700 Maxwell Rd
Chula Vista, CA 91911

California Hazardous Waste: Copper Mountain Landfill
34853 E. County 12th Street
Wellton, AZ 85356

The Contractor will provide the name, address, telephone number, and contact person for alternative proposed offsite recycling, treatment, or disposal facility to Leighton for review. This submittal is considered a prescreening of the Contractor-proposed receiving facilities or locations. Prior to transporting any impacted materials offsite to a treatment or disposal facility, the Contractor will obtain a statement from the facility indicating that the facility has reviewed the applicable laboratory data, profile forms, and soil or liquid waste disposal quantity information provided by the Contractor and can legally accept the material. This statement shall also include any contingencies upon which the acceptance is based. If additional testing is required, the facility shall indicate types, numbers, and locations of tests. Leighton will evaluate the request for any additional testing, determine the reasonableness of the request, and arrange for and conduct the additional testing as necessary. All impacted soils will be transported under appropriate waste manifest or bill of lading to a pre-approved treatment or disposal facility.

At the disposal facility, the waste manifest must be countersigned by representatives of the facility, and copies returned to the Site for delivery to the owner’s representative, as proof of final disposal.
8.0 INERT WASTE DISPOSAL

Disposal of inert waste (i.e. clean soil) pursuant to the SDRWQCB Order No. R9-2014-0041 will be to facilities chosen by the contractor. The selected contractor shall submit the proposed disposal sites a minimum of three days prior to disposal to dasMod for review and written authorization to proceed with each site.
9.0 SUPPORTING ACTIVITIES

The Contractor will perform all work in a manner that will minimize the potential spreading of impacted soil and/or potentially hazardous wastes and substances and will maintain active dust and erosion controls at all times. If previously unidentified contaminated soil is encountered, the Contractor will maintain a record of all monitoring and sampling activities that will be used to describe the actions taken to protect worker health and safety.

The Contractor will maintain all field records relating to the discovery, identification, handling, and disposal of impacted (if necessary) soil and debris, air monitoring, and soil sampling. At a minimum, the Contractor will be required to maintain the following documentation during the project such that an accurate record of events can be prepared to describe the health, safety, and disposal efforts made by the Contractor. The documents that will be maintained throughout the job and submitted to the Block F Titleholder, LLC when the job is completed including:

- Health and Safety Meeting Forms that document the attendees, topics and frequency of health and safety meetings that are held during the construction activities;
- Field Logbook documenting site conditions, changes in scope, and actions taken to enforce site health and safety requirements;
- Air Monitoring Forms documenting the results of all air monitoring measurements; to include the time, location, instrument type and reading, and concentration detected for each monitoring event;
- Sample Location Maps illustrating the date, location, and type of sample collected as well as sampling rationale (e.g. stockpile sample, in-place soil sample, etc.);
- Chain of Custody Forms documenting the sample identification numbers, the time and date the samples were collected, the laboratory analysis requested, and name of sample collector;
- Laboratory Reports documenting the results of laboratory analyses performed on the samples.
10.0 SITE CONTACTS

Construction activities for the excavation of the project are proposed to begin in 2018. Prior to commencement of construction activities, the general contractor, environmental consultant, soil excavation contractor, and other relevant parties will meet to discuss this SMP and related construction planning. The following points of contact have been provided for the Site:

<table>
<thead>
<tr>
<th>Role</th>
<th>Name Address</th>
<th>Phone</th>
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</table>
| Developer/Property Manager | DM La Costa Avenue, LLC  
Mr. Lindsay Brown 
P.O. Box 232370 
Encinitas, CA 92023 | (858) 220-3551 |
| Environmental Consultant | Leighton Consulting, Inc. 
Mr. Brian Pierce 
3934 Murphy Canyon Road 
Suite B-205 
San Diego, CA 92123 | (858) 300-8495 |
Figure 1

SITE LOCATION MAP
Additional Site Assessment
516 La Costa Avenue
Encinitas, California

Approximate Site Boundary
Table 1: Summary of Soil Sample Analytical Results - OCPs
516 La Costa Avenue
Encinitas, California

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<table>
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<th>Depth (ft. bgs)</th>
<th>Chlor dane (µg/kg)</th>
<th>4,4’-DDD (µg/kg)</th>
<th>4,4’-DDE (µg/kg)</th>
<th>4,4’-DDT (µg/kg)</th>
<th>Dieldrin (µg/kg)</th>
<th>Heptachlor Epoxide (µg/kg)</th>
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<td>RSLs - Residential Soil</td>
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<td>2,000</td>
<td>1,900</td>
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Notes:

- **OCP** = Organochlorine Pesticides
- **Bold** indicates concentration above laboratory detection limit
- **Red** indicates concentration above relevant screening level
- µg/kg = micrograms per kilogram
- **ft. bgs** = feet below ground surface
- -- = Not analyzed/not applicable
- **RSLs** = EPA Region 9 Regional Screening Levels (RSLs) (June, 2017)
- 1,500* = DTSC HERO Note 3 DTSC-SLs (August, 2017)
- <5.0 = Concentration below Laboratory Detection Limits
<table>
<thead>
<tr>
<th>Sample ID</th>
<th>Date</th>
<th>EPA Method 8015</th>
<th>EPA Method 6010</th>
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<td>TPH C6-C10</td>
<td>TPH C10-C28</td>
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Notes:
- mg/kg = milligrams per kilogram
- µg/L = micrograms per liter
- ft. bgs = feet below ground surface
- RSLs = USEPA Region 9 - Regional Screening Level for Residential Soil (EPA, 2018)
- Tier 1 SSLs = Tier 1 Soil Screening Levels (SDRWQCB, R9-2014-0041)
- TPH = Total Petroleum Hydrocarbons

- >5.0 = Concentration below laboratory reporting limits
- <5.0 = Concentration in excess of respective screening levels
- <5.0 = Concentration in excess of respective screening levels
- RSLs = USEPA Region 9 - Regional Screening Level for Residential Soil (EPA, 2018)
- Tier 1 SSLs = Tier 1 Soil Screening Levels (SDRWQCB, R9-2014-0041)
- TPH = Total Petroleum Hydrocarbons
<table>
<thead>
<tr>
<th>Sample ID</th>
<th>Sample Date</th>
<th>Sample Depth (feet bgs)</th>
<th>Benzene (µg/L)</th>
<th>Toluene (µg/L)</th>
<th>Ethylbenzene (µg/L)</th>
<th>Xylenes (µg/L)</th>
<th>MTBE (µg/L)</th>
<th>Chloroform (µg/L)</th>
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**Screening Levels**

<table>
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<tr>
<th>Screening Levels</th>
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<tbody>
<tr>
<td>RSLs for Commercial Air</td>
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**Notes:**

- VOCs = Volatile Organic Compounds
- µg/L = micrograms per liter (ppb)
- bgs = below ground surface
- Bold = Indicates concentration detected above laboratory reporting limits
- 0.28 = Concentration in excess of RSL
- 0.42* = DTSC HERO Note 3 DTSC-SLs for Residential Air (August, 2017)
- 1,300* = DTSC HERO Note 3 DTSC-SLs for Residential Air (August, 2017)
APPENDIX A

REFERENCES
APPENDIX A

References


County of San Diego Department of Environmental Health (SDDEH), 2004, Site Assessment and Mitigation Manual, updated 2011.

Engineering Design Group, 2018, Preliminary Geotechnical Investigation and Foundation Recommendations, Proposed Commercial Structure to be Located at 516 La Costa Avenue, Encinitas, California 92024, dated February 27.


United States Environmental Protection Agency (EPA) Region 9, Regional Screening Levels (RSLs), Screening Levels for Chemical Contaminants, Summary Table, updated November 2018.