

Date: June 14, 2022

Project No.: 118-125-2

Prepared For: Ms. Maria Kisyova
DAVID J. POWERS & ASSOCIATES, INC.
1871 The Alameda, Suite 200
San Jose, CA 95126

Re: Environmental Document Review
World Oil Gas Station
16720 Monterey Road
Morgan Hill, California

Dear Ms. Kisyova:

Per your request, Cornerstone Earth Group (Cornerstone) is pleased to present this letter summarizing our review of selected environmental information pertaining to the World Oil gasoline station facility at 16720 Monterey Road, Morgan Hill, California (Site). This letter was prepared for David J. Powers & Associates in accordance with our April 22, 2022 agreement.

Project Background

We understand that David J. Powers is providing California Environmental Quality Act (CEQA) support to redevelop the Site, which has been occupied by a gasoline service station since at least the 1960s. The proposed project includes demolition and removal of an existing underground storage tank (UST) system, fuel island canopy, commercial building, utility enclosure, lights, fencing, landscaping and pavements. Construction of a new service station retail building is planned, along with a new UST system, fuel island canopy, trash enclosure, area lights and pavements.

Scope of work

As presented in our Agreement, the scope of work performed for this study included a review of the provided December 6, 2021 memorandum by Apex Companies LLC (Apex) titled *Technical Memo of Findings from Shallow Soil Sampling on November 3, 2021 at World Oil #52, 16720 Monterey Road, Morgan Hill, California*.

Prior Review

In 2021, Cornerstone conducted a review of prior environmental reports and site history information and provided a letter dated June 1, 2021. Based on the information reviewed, Cornerstone concluded and recommend the following:

- The on-Site World Oil Company gasoline station is listed as a closed case on the leaking underground storage tank (LUST) database. Because residual contaminants remain at the Site, the Santa Clara County Department of Environmental Heal (DEH) case closure letter and associated closure summary stipulate various Site management requirements. These requirements include notifying the DEH and Building Department of the planned

development activities and the presence of residual contamination, and the implementation of appropriate actions so that there is no significant impact to human health, safety, or the environment. To facilitate compliance with the Site management requirements, we recommended preparing a Site Management Plan (SMP) and Health and Safety Plan (HSP) for the proposed development activities. The purpose of these documents will be to establish appropriate management practices for handling impacted soil, soil vapor and groundwater that may be encountered during construction activities. Based on the history of the Site, areas of impacted soil, soil vapor and groundwater may be encountered during construction activities, which may require special monitoring, handling and/or disposal. We recommended forwarding the SMP to the DEH for their review and approval.

- The eastern portion of the Site historically was used for agricultural purposes. Pesticides may have been applied to crops in the normal course of farming operations. Residual pesticide concentrations may remain in on-Site soil. Prior to the commencement of earthwork activities at the Site (*e.g.*, excavation, grading, trenching, etc.) we recommended that soil sampling be performed on the eastern portion of the Site to evaluate soil quality for the potential presence of agricultural chemicals (*i.e.*, organochlorine pesticides and associated metals including lead and arsenic).
- What appear to have been residences and associated outbuildings historically were located on the Site prior to construction of the existing gasoline station. Soil adjacent to structures that are painted with lead-containing paint can become impacted with lead as a result of the weathering and/or peeling of painted surfaces. Soil near wood framed structures also can be impacted by pesticides historically used to control termites. No information was identified during this study documenting the use of lead based paint or termite control pesticides on-Site; however, if used, residual pesticide and lead concentrations may remain in on-Site soil. Lead and/or pesticides often are identified in soil near old residences, such as those historically located on-Site. Prior to redevelopment of the Site, we recommended that shallow soil at the former structure locations be evaluated for the possible presence of lead and pesticides.

Review of 2021 Memorandum

Based on the provided Memorandum (Apex, 2021), soil sampling was performed at the Site in November 2021 to evaluate potential impacts to the Site associated with prior agricultural activities, as well as to evaluate the potential presence of lead and pesticides in soil near prior structures.

Soil samples were collected by Apex from a depth of 2 feet at ten on-Site locations. The samples were analyzed at a state-certified laboratory for organochlorine pesticides (OCPs), lead, arsenic and mercury.

OCPs were not detected except in one of the ten samples in which DDE and DDT were detected at 0.0080 milligrams per kilogram (mg/kg) and 0.0095 mg/kg, respectively. These concentrations do not exceed established screening levels for residential or commercial properties, and also do not exceed screening levels established for the protection of construction workers.

The detected lead, arsenic and mercury concentrations appear typical of natural background levels.

Conclusions and Recommendations

As previously recommended (Cornerstone, 2021), to facilitate compliance with Site management requirements established by the DEH associated with the closed LUST case, we recommended preparing a Site Management Plan (SMP) and Health and Safety Plan (HSP) for the proposed development activities. The SMP should be provided to the DEH for their review and approval.

Based on the soil sampling data (Apex, 2021), the Site does not appear to have been significantly impacted by past agricultural activities, or by the potential use of lead based paint or termite control pesticides at prior structures.

Note, however, the soil samples collected by Apex in 2021 reportedly were collected from a depth of 2 feet. Department of Toxic Substances Control (DTSC) guidance¹ recommends that soil samples at agricultural properties be collected from the upper 0 to 6 inches of soil. The greatest pesticide concentrations typically are present in near-surface soil. Thus, the reported analyte concentrations may be lower than those present in soil at more shallow depths. The City of Morgan Hill is requiring additional soil sampling to better evaluate shallower soil quality and the results incorporated into the SMP. The SMP must be reviewed and approved by DEH prior to issuance of a grading permit.

Limitations

Cornerstone performed this investigation to support David J. Powers & Associates in the evaluation of the referenced Site. Conclusions presented in this letter are based on limited, readily available information. This letter, an instrument of professional service, was prepared for the sole use of David J. Powers & Associates and may not be reproduced or distributed without written authorization from Cornerstone. It is valid for 180 days. Cornerstone makes no warranty, expressed or implied, except that our services have been performed in accordance with the environmental principles generally accepted at this time and location.

We thank you for this opportunity to work with you on this important project. Should you have any questions, please contact us at your convenience.

Sincerely,

Cornerstone Earth Group, Inc.



Michael F. Chang, P.E.
Project Engineer

¹ DTSC. August 7, 2008. *Interim Guidance for Sampling Agricultural Properties (Third Revision)*.