



Phase I Environmental Site Assessment

14050 Day Street
Moreno Valley, California 92553

February 19, 2022

First Industrial Realty Trust, Inc., First Industrial, L.P.
First Industrial Acquisitions II, LLC and their Affiliates and Assigns
One North Wacker Drive, Suite 4200
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Project Number 21-12-022

Prepared by:



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February 19, 2022

Jacob Kentnich
First Industrial Realty Trust, Inc.
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Subject: Phase I Environmental Site Assessment
14050 Day Street
Moreno Valley, California 92553
Project Number 21-12-022

Dear Mr. Kentnich:

Weis Environmental, LLC has completed the contracted environmental consulting services for the above-referenced project. The services were performed in accordance with our proposal and agreement fully executed by all parties. The Phase I Environmental Site Assessment has been performed in accordance with American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation E1527-21 and Title 40 of the Code of Federal Regulations (40 CFR) Part 312. This assessment was also completed in accordance with the First Industrial Realty Trust Scope of Work for Phase I ESAs. We appreciate the opportunity to be of service to you on this project. Please contact us if you have any questions or comments regarding this report or if we can be of further assistance.

Sincerely,

Weis Environmental, LLC

A handwritten signature in black ink that reads "Daniel Weis". The signature is written in a cursive, flowing style.

Daniel Weis, R.E.H.S.
Environmental Manager

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- Appendix C Regulatory Agency Records
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1.0 INTRODUCTION

This report presents the methods and findings of a Phase I Environmental Site Assessment (ESA) of the property located at 14050 Day Street and identified by Riverside County Assessor's Parcel Number (APN) 297-130-036 in the City of Moreno Valley, California (Subject Property) performed in conformance with the contract/agreement for this assignment and the scope and limitations of ASTM Standard Practice E1527-21 and United States Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI) as published in 40 Code of Federal Regulations (CFR) Part 312. EPA promulgated the AAI rule that became effective in November 2006. An acknowledgment is pending by the EPA that the ASTM E1527-21 practice is consistent with the requirements of AAI and may be used to comply with the provisions of the AAI rule. As such, it should be noted that this report also complies with the previously published ASTM E1527-13 standard and for the purposes of this report, any statement regarding compliance with ASTM E1527-21 is also an acknowledgment that the report complies with ASTM E1527-13 and the AAI rule. This assessment was also completed in accordance with the First Industrial Realty Trust Scope of Work for Phase I ESAs.

1.1 Purpose

The purpose of the ASTM E1527-21 practice (framework for this Phase I ESA) is to define good commercial and customary practice in the United States of America for conducting an ESA of a parcel of real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (Title 42 United States Code (U.S.C.) Section 9601)) and petroleum products. As such, this practice is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (hereinafter, the "landowner liability protections," or "LLPs"): that is, the practice that constitutes all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. Section 9601(35)(B).

In defining a standard of good commercial and customary practice for conducting this Phase I ESA of the Subject Property, the goal of the processes established by the ASTM E1527-21 practice is to identify, to the extent feasible, recognized environmental conditions. The term recognized environmental conditions 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. In addition, controlled recognized environmental conditions, historical recognized environmental conditions and/or de minimis conditions, if identified during the completion of the assessment, are discussed herein. Definitions of these terms and other key terminology relevant to the practice are included in Section 14.0 of this report.

1.2 Scope of the Assessment

In general terms, this Phase I ESA included the acquisition of readily available/accessible and practically reviewable regulatory records and historical information, a site reconnaissance, interviews and preparation of this written report of findings. A more detailed description of the four primary components of the Phase I ESA is presented below.



Records Review - A review of Federal, State, Tribal and local standard ASTM and non-ASTM regulatory databases for a myriad of environmental identifiers including but not limited to properties with underground storage tanks (USTs), properties with leaking USTs, properties that have reported spills/releases that did not occur from a leaking UST, businesses that utilize hazardous materials and/or generate hazardous waste and hazardous waste disposal locations. The regulatory review may also include public records requests with one or more Federal, State, Tribal and/or local agencies. A review of historical sources is also completed to help ascertain previous land uses of the property in question and in the surrounding area.

Subject Property Reconnaissance - A property inspection and viewing of adjacent and surrounding properties for conditions that could be recognized environmental conditions.

Interviews - Interviews with present and past owners, operators and/or occupants of a property and local government officials.

Reporting - Evaluation of the information gathered during the completion of the Phase I ESA and the subsequent preparation of a written report.

1.3 Limitations and Exceptions

Concerns regarding liability under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 et seq. (CERCLA) and analogous State laws, have been a primary driver for Phase I ESA assignments in commercial real estate transactions. While the ASTM E1527-21 practice can be used in many contexts, a familiarity with CERCLA and its potential LLPs is critical in understanding and applying the ASTM E1527-21 practice. We advise consultation with legal counsel if further inquiry or information is desired.

AAI represents the minimum level of inquiry necessary to support the LLPs. However, it is important to understand that additional inquiry ultimately may be necessary or desirable for legal as well as business reasons depending upon the outcome of this inquiry and the particular risk tolerances of a given user. For example, additional inquiry may assist a user of a Phase I ESA in determining whether he or she would have continuing obligations in the event he or she acquires a given property and may also assist the user in defining the scope of future steps to be taken to satisfy such obligations. In addition, a user may be concerned about business environmental risks or non-scope ASTM considerations that do not fall within the definition of a recognized environmental condition. In addition, this assessment did not include subsurface or other invasive exploration, unless specifically documented herein. Users are also cautioned that Federal, State, Tribal and local laws may impose environmental assessment obligations that are beyond the scope of the ASTM E1527-21 practice.

The evaluation, opinion and conclusions presented herein are based solely on visual observations and regulatory, historical and personal knowledge related information that existed at the time our assessment was completed. The use of the gathered information is exclusively for the purposes outlined in this report and only for the Subject Property. Our firm can make no warranty, either express or implied, except that the services conducted were performed in accordance with generally accepted environmental assessment practices applicable at the time and location of the assessment and that the conclusions of the assessment have been based in part on professional judgment/experience, an interpretation of readily available data and the standard of care normally followed by similar professionals practicing in a similar locale and under similar circumstances. Any opinions presented cannot apply to Subject Property changes of which our firm is unaware and has not had the opportunity to evaluate. In addition, this report cannot feasibly include any evaluation of undocumented activities at the Subject Property or on adjacent or nearby properties. Lastly, a Phase I ESA meeting or exceeding



this practice and completed less than 180 days prior to the date of acquisition of a given property or (for transactions not involving an acquisition) the date of the intended transaction is presumed to be valid.

1.4 Special Terms and Conditions

This Phase I ESA was prepared in accordance with the terms and conditions of the contract/agreement for the work as executed between our firm and the client. There are no other special terms and conditions established between our firm and the client pertinent to the findings of this ESA or methodology used to complete this assessment. In addition, our firm has no final or other vested interest in the Subject Property or adjacent/surrounding properties, or in any entity that owns or occupies the Subject Property or adjacent/surrounding properties.

1.5 Limiting Conditions and Deviations

There were no significant limiting conditions that would inhibit our ability to identify recognized environmental conditions noted during the completion of this assessment. In addition, there were no deviations from the ASTM E1527-21 standard noted during the completion of this assessment. Any limiting conditions that are not considered to be ones that would inhibit our ability to identify recognized environmental conditions at the Subject Property are referenced in applicable sections of this report.

1.6 Data Failure and Data Gaps

No instances of data failure were encountered during the completion of this assessment. In addition, no data gaps of significance (i.e., those that would inhibit our ability to identify recognized environmental conditions) were identified during the completion of this assessment. Any data gaps that are not considered to be ones that would inhibit our ability to identify recognized environmental conditions at the Subject Property are referenced in applicable sections of this report.

1.7 Reliance

This report has been prepared for the exclusive use of First Industrial Realty Trust, Inc., First Industrial, LP and First Industrial Acquisitions II, LLC and their Affiliates and Assigns (User). This report may not be relied upon by any other person or entity without the written consent of both our firm and our client. The scope of services performed for this assessment may not be appropriate to satisfy the specific needs of other users, and any use or reuse of this document would be at the sole risk of said users. Any other party seeking liability protection under CERCLA must take independent action to accomplish its objective.



2.0 SUBJECT PROPERTY DESCRIPTION

2.1 Location and Legal Description

The Subject Property is a reported 7.82 acres and located generally north of Cactus Avenue, south of Alessandro Boulevard, east of Day Street and west of Elsworth Street. The Subject Property is further identified by Riverside County APN 297-130-036. A Vicinity Map is included as Figure 1. A Site Plan is included as Figure 2.

2.2 Subject Property and Vicinity Characteristics

The Subject Property is situated in an area of Moreno Valley comprised primarily of commercial and light industrial properties, vacant land, and public roadways. March Air Force Base is situated to the southeast of the Subject Property.

2.3 Current Use of the Subject Property

The Subject Property is currently utilized for rubber recycling, storage, and office space by BAS Recycling, Inc. Specifically, facility operations include the manufacturing of recycled ground rubber from scrap tires. Products produced include playground cover, synthetic sports fields, rubberized asphalt concrete, colorized rubber mulch, injection molded products, and tire-derived aggregate.

2.4 Description of Subject Property Improvements

The Subject Property is developed with a one-story light industrial warehouse building with a mezzanine level. The building is an estimated 63,000 square feet and was reportedly constructed in 1973. The structure appears to be of corrugated steel construction and situated on a concrete slab-on-grade foundation. Two 11,000-gallon refrigerated nitrogen above-ground storage tanks are located along the northern exterior of the structure. Various equipment associated with Subject Property operations are present throughout the interior of the building and portions of the exterior lot areas. Other portions of the Subject Property consist of asphalt- and concrete-paved driveways, parking and storage areas, shipping/receiving areas, and minor landscaping. Access to the Subject Property is provided by Day Street. Indicators of various utility systems are also present throughout the Subject Property.

2.5 Utilities

Utilities that are reported to be present at the Subject Property or provide service in the surrounding area are noted below along with their municipal provider where applicable.

Utility	Provider (Where Applicable)
Potable Water	Eastern Municipal Water District
Sewage Maintenance	City of Moreno Valley
Electrical	Southern California Edison
Natural Gas	Southern California Gas
Solid Waste Disposal	City of Moreno Valley



2.6 Description of Adjoining Properties

Adjoining properties are defined as any real property or properties, the border of which is contiguous or partially contiguous with that of the subject property of a Phase I ESA, or that would be contiguous or partially contiguous with that of a subject property but for a street, road, or other public thoroughfare separating them. To the extent feasible, our firm performed a visual inspection of adjoining properties from the Subject Property boundaries and along public right of ways. We did not encroach on to adjoining private property during the completion of this assessment. The following table identifies the adjoining property uses:

Direction	Adjoining Property Use
North	Light industrial/commercial property (22101 Alessandro Boulevard).
South	Light industrial property (22150 Goldencrest Drive).
East	Light industrial/commercial property (22201 Alessandro Boulevard).
West	Day Street then light industrial property and storage yard (21921 Alessandro Boulevard).

2.7 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the land use of the Subject Property and improvements at the Subject Property. In addition, the land uses of adjoining properties and properties in the vicinity of the Subject Property do not represent recognized environmental conditions to the Subject Property.



3.0 PHYSICAL SETTING

3.1 Topography

The Subject Property is depicted on the United States Geological Survey (USGS) topographic map for the Riverside East, California 7.5-minute quadrangle. The Subject Property is shown on the map as being situated at an elevation of approximately 1,560 feet above mean sea level. The Subject Property and surrounding area appear to trend slightly to the west. There are no improvements or structures depicted on the Subject Property on the map. Adjoining and surrounding roadways are depicted on the map. The Subject Property as depicted on a topographic map is included as Figure 3.

3.2 Hydrology

The Subject Property is situated within the Tequesquite Hydrologic Unit Code 12 watershed and the Perris South Hydrologic Area. An unlined drainage swale is present along the western and southern perimeters. There are no known substantial hydrologic features at the Subject Property including major storm drain inlets or drainages, channels, or surface waters. Infiltration of precipitation can be expected in limited areas of the Subject Property due to its primarily improved nature. Any excess water would appear to flow as surface runoff to the west and streets/roadways and surrounding areas of lower elevation. The Subject Property does not appear to receive significant drainage from off-site properties.

3.3 Geology

General geologic information pertaining to the Subject Property is presented in the table below.

Geologic Consideration	Details
California Geomorphic Province	Peninsular Ranges.
Mapped Soils or Formation	Very old alluvial fan deposits. Unconsolidated and semi-consolidated.
Description of Soils or Formation	Slightly to moderately consolidated silts, sands, clays and gravel.
Distance/Direction to Mapped Faults	No known faults are present on the Subject Property. An unnamed mapped fault is located approximately two miles southwest of the Subject Property. The nearest fault zone is the San Jacinto Fault Zone approximately 7.5 miles northeast of the Subject Property.

3.4 Hydrogeology

General hydrogeologic information pertaining to the Subject Property is presented in the table below.

Hydrogeologic Consideration	Details
Groundwater Basin or Unit	Perris South Hydrologic Area.
Beneficial Uses	Municipal and agricultural.
Estimated Depth to Groundwater	Greater than 30 feet below the surface.



Hydrogeologic Consideration	Details
Estimated Flow of Groundwater	South to southwest.
Known Subject Property or Regional Groundwater Contamination Issues	The March Air Force Base National Priorities List (NPL) site is located to the southeast of the Subject Property (cross to down gradient). March Air Force Base is not considered to be a recognized environmental condition to the Subject Property.

3.5 Oil and Gas Exploration

According to online resources provided by the California Department of Conservation, Geologic Energy Management Division (CalGEM), there are no oil, gas or geothermal wells located on the Subject Property or its adjacent properties.

3.6 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with Subject Property physical setting considerations. In addition, physical setting considerations related to the adjoining properties and properties in the vicinity of the Subject Property do not represent recognized environmental conditions to the Subject Property.



4.0 USER PROVIDED INFORMATION

A representative of the User of this report was interviewed during the completion of this assessment. The questions posed during the interview are defined by the ASTM E1527-21 practice. The User also provided our firm with any land title records and judicial records that may be available for the Subject Property as part of the required evaluation for environmental liens and activity and use limitations (AULs) in connection with the subject property of a Phase I ESA. As stated in the ASTM E1527-21 practice, it is the responsibility of the user of the report to provide any available records pertaining to environmental liens and AULs that may exist in connection with a given property. Any land title and judicial records provided to our firm are discussed below. If such information is not discussed in the sections below, it was not provided by the user of the report.

In addition to the contact information obtained, the user of the report was also asked if they are aware of other useful documents that may exist and if so whether copies can be provided to the environmental professional within reasonable time and cost constraints. A list of typical useful documents is included in Section 10.8.1 of the ASTM E1527-21 practice and include but are not limited to environmental assessment reports, compliance audits and permits, registrations for tank and other aboveground or underground systems, safety plans, spill prevention and other facility related plans and geological/geotechnical studies and environmental governmental agency notices and/or correspondence.

4.1 Title Records

The User provided an ALTA/ACSM Land Title Survey for the Subject Property dated December 18, 2007. The ALTA survey identifies a high-pressure gas line easement crossing the southern portion of the Subject Property from east to southwest. The easement for a pipeline and incidental purposes was recorded June 4, 1948. No environmental liens, deed restrictions or AULs are noted. The survey is included in Appendix A.

4.2 Environmental Liens

The User is unaware of environmental liens in connection with the Subject Property.

4.3 Activity and Use Limitations

The User is unaware of AULs in connection with the Subject Property.

4.4 Specialized or Actual Knowledge or Experience

The User is unaware of specialized knowledge, actual knowledge or experience that is material to recognized environmental conditions in connection with the Subject Property.

4.5 Commonly Known or Reasonably Ascertainable Information

The User is unaware of commonly known or reasonably ascertainable information within the local community that is material to recognized environmental conditions in connection with the Subject Property.



4.6 Valuation Reduction for Environmental Issues

The User is unaware of information pertaining to an undervalued purchase price of the Subject Property relative to the estimated fair market value of the Subject Property due to the presence of contamination.

4.7 Owner, Property Manager, and Occupant Information

The Subject Property is currently owned and managed by First Industrial Realty Trust (owner since 2008). The Subject Property is currently occupied by BAS Recycling, Inc.

4.8 Reason for Performing Phase I ESA

The User has commissioned this Phase I ESA to assist the client in complying with 40 CFR Part 312.

4.9 Proceedings Involving the Subject Property

The User is unaware of pending, threatened, or past litigation and administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Subject Property. The client is also unaware of notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products in connection with the Subject Property.

4.10 Other Provided Documents

The following prior Phase I and II ESAs performed for the Subject Property were provided by the client:

- United Strategies, Inc. 2002. Phase I Environmental Site Assessment, 14050 Day Street, Moreno Valley, CA 92553, County of Riverside. Authorized by and prepared for: Tom Powell, Thor-California, Inc. July 2002.
- LFR, Inc. 2007. Phase I Environmental Site Assessment, Thor California, Inc., 14050 Day Street, Moreno Valley, California 92553. Prepared for: First Industrial Realty Trust and First Industrial, L.P. December 12, 2007.
- LFR, Inc. 2008. Soil Investigation Report, Thor California Property, 14050 Day Street, Moreno Valley, California 92553. Prepared for: First Industrial Realty Trust, First Industrial, L.P., and First Industrial Investment, Inc. January 15, 2008.
- Global Realty Services Group. 2011. Phase I Environmental Site Assessment, Property Reference: 14050 Day Street, Moreno Valley, CA. Prepared for: First Industrial, L.P. February 28, 2011.

In 2002, United Strategies, Inc. prepared a Phase I ESA on behalf of Thor-California, Inc. for the Subject Property. The assessment included a property reconnaissance, interviews with knowledgeable personnel, public records review, environmental database search, and review of historical documentation. At the time of the assessment, the Subject Property was owned and occupied by Maestro Products, Inc. a manufacturer of window products. Other Subject Property operations and uses included office space, storage, a paint booth, and clean room. Off-site findings included four leaking USTs within approximately one quarter mile and the March Air Force Base NPL site just beyond one quarter mile to the south of the Subject Property. These findings were considered de minimus conditions. No recognized environmental conditions were identified.



LFR, Inc. prepared a Phase I ESA and Soil Investigation Report on behalf of First Industrial Realty Trust. The Phase I ESA was performed in general accordance with ASTM Standard E1527-05 and consisted of a site reconnaissance, drive-by observations of adjacent properties, review of previous reporting, interviews with knowledgeable personnel, review of historical documentation, and review of federal, state, and local regulatory databases. Findings, relevant information, and conclusions presented in the LFR, Inc. Phase I ESA included the following:

- At the time of the ESA, the Subject Property was being vacated by Thor California, Inc. who assembled travel trailers. The Subject Property was improved with a 63,000-square foot, single-story warehouse building. The Subject Property was vacant land from at least 1901 to 1967 with Subject Property operations beginning in approximately 1973. Previous Subject Property occupants included Maestro Products, Inc. a window products manufacturer, Rohr Industries, Inc. an aircraft engine component manufacturer, and Redman Homes, Inc. a builder of modular homes.
- During the Subject Property reconnaissance, three square-shaped concrete patches with concrete-filled suspected drains were observed in the northeast side of the warehouse building. Exact historical use at these patched locations was unknown. These features were identified as a suspected environmental concern.
- A bermed storage area and concrete pad were observed in the northwest portion of the Subject Property and adjacent to the western side of the warehouse building, respectively. No information of past use of these areas was identified. These features were identified as suspected environmental concerns.
- The limited information identified concerning past occupant activities, in particular Rohr Industries, Inc., was considered a historical environmental concern.
- Stained gravel (suspected motor oil) and stained concrete (suspected oil) were observed in the southern Subject Property exterior, compressor, and the trash compactor area. These were considered de minimus conditions.

Based on the above findings, a soil investigation was performed by LFR, Inc. The general scope of work and associated findings and conclusions were as follows:

- Soil borings and sampling were completed at the Subject Property in the building interior and Subject Property exterior targeting areas of concern and stormwater drainage features identified during the 2007 Phase I ESA.
- Thirty-five (35) soil samples were collected from 12 boring locations at depth of up to 15 feet below ground surface. The five-foot sample from each boring was analyzed for gasoline-, diesel-, and motor oil-range total petroleum hydrocarbons (TPH-g, TPH-d, and TPH-mo, respectively), metals, and volatile organic compounds (VOCs).
- TPH-mo was detected at a concentration of 25 milligrams per kilogram in a sample collected at the northwest corner of the Subject Property. TPH-g, TPH-d, and TPH-mo were not detected above reporting limits in other samples. The detection of TPH-mo is considered to be insignificant.
- Trace metals were detected in samples at concentrations below both the Total Threshold Limit Concentrations and ten times the Soluble Threshold Limit Concentrations. Detected metals



concentrations were considered to be representative of local soil background concentrations in the Subject Property vicinity.

- VOCs were not detected above reporting limits in the collected samples.
- Based on the detected constituent concentrations, no further investigation of the Subject Property was recommended.

In 2011, Global Realty Services Group prepared a Phase I ESA on behalf First Industrial L.P. for the Subject Property. The assessment was performed in general accordance with ASTM Standard E1527-05 and included a property reconnaissance, interviews with knowledgeable personnel, public records review, environmental database search, review of historical documentation, and a summary of prior environmental assessment reporting. At the time of the assessment, the Subject Property was owned by First Industrial and occupied by BAS Recycling, Inc. a recycler of scrap tires and manufacturer of various recycled rubber products. Other Subject Property operations and uses included office space and storage. Hazardous materials identified included gear oil, paint, grease, and non-RCRA hazardous wastes including residual oil, grease, and water-based binder glue (Poly Bond). Wastes produced on-Subject Property were disposed of and collected by certified hazardous waste haulers on a periodic basis. An active National Pollutant Discharge Elimination System (NPDES) permit for regulating and controlling surface water discharge during storm events was identified for the Subject Property. Off-site and historical findings were consistent with prior reporting. No recognized environmental conditions were identified. Based on the Phase I ESA findings, no additional action or assessment were recommended.

In addition to the prior environmental assessment reports, the User provided asbestos containing material and mold survey documentation related 2021 post-fire restoration activities. Survey and restoration activities were performed by BluSky Restoration Contractors, LLC and their subcontractors. Asbestos containing dry-wall was completely removed from the Subject Property building and building materials affected by water damage were also confirmed to be removed. The work areas were cleared for reoccupancy at the completion of the work. In addition, a report of sampling and analysis of contained water resulting from extinguishing the former fire at the Subject Property was provided to our firm. Metals and VOCs were evaluated and no concerns were identified in the water relative to such compounds.

4.11 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the user provided information.



5.0 REGULATORY RECORDS REVIEW

Our firm commissioned the preparation of a regulatory database report from Environmental Risk Information Services (ERIS) as part of the regulatory records review. ERIS searches a myriad of Federal, State, and local government environmental databases during the preparation of their deliverables. Certain databases are specifically required by the ASTM E1527-21 practice and are referenced as “standard ASTM regulatory databases.” Such databases are searched to at least the minimum search distance around a given property as defined in the practice. Other regulatory databases are also searched that are not specifically referenced in ASTM E1527-21. Such databases are referenced as “non-ASTM regulatory databases” and are searched as varying radii around a given property as selected by ERIS.

Descriptions of each database searched and the dates that the regulatory databases were last updated by the applicable agencies are included in the ERIS report. The extent of historical information varies with each database and current information is determined by what is publicly available to ERIS at the time of an updates. ERIS updates databases in accordance with ASTM E1527-21 which states that government information from nongovernmental sources may be considered current if the source updates the information at least every 90 days, or, for information that is updated less frequently than quarterly by the government agency, within 90 days of the date the government agency makes the information available to the public.

Our firm also reviewed unplottable sites listed in the database report by cross-referencing reasonably ascertainable information pertaining to such properties that may include facility names, street names, zip codes or other information. Unplottable sites are ones that cannot be formally mapped or geocoded due to various reasons, including limited geographic information. Any unplottable sites that we identify within the specified search radii have been evaluated as part of the preparation of this report. A copy of the regulatory database report is included in Appendix B.

5.1 Standard ASTM Regulatory Database Search

The tables below present the standard Federal, State, Tribal and local ASTM databases that were searched by ERIS including the search distances from the Subject Property. Below the tables are descriptions of any listings for the Subject Property that may appear in the databases. In addition, a discussion of adjoining properties or properties in the Subject Property vicinity that are listed in one or more regulatory databases that in our professional judgment and opinion have the potential to adversely impact the Subject Property due to current or former releases of hazardous substances and/or petroleum products that occurred at said properties is presented. This practice of discussing only properties of potential environmental concern to the Subject Property is noted in ASTM E1527-21 which states that the environmental professional may make statements applicable to multiple properties listed in regulatory databases that are not likely to have current or former releases of hazardous substances and/or petroleum products with the potential to migrate to the a given subject property. Our professional judgment and opinions discussed herein are based on several factors including the nature of the regulatory database listings, distance of the off-site listed properties from the Subject Property, orientation of the listed properties relative to the Subject Property, interpreted the direction of groundwater flow and/or regulatory case status information for the various properties as described in the databases.



The following Federal standard ASTM databases were searched:

Standard Environmental Record Source Name	ERIS Regulatory Database Identification	Search Distance From Subject Property (Miles)
National Priorities List (NPL) Site List	NPL – Proposed NPL – Superfund Record of Decision (ROD)	1.0
Delisted NPL Site List	Deleted NPL	0.5
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List	CERCLIS - SEMS – SEMS Archive – ODI – IODI – CERCLIS LIENS – SEMS LIENS	0.5
CERCLIS List	CERCLIS LIENS – SEMS LIENS	Subject Property
CERCLIS No Further Remedial Action Planned (NFRAP) Site List	CERCLIS NFRAP	0.5
Resource Conservation and Recovery Act (RCRA) Corrective Action Sites (CORRACTS) Facilities List	RCRA CORRACTS	1.0
RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) Facilities List	RCRA TSD	0.5
RCRA Generators List	RCRA LQG – RCRA SOG – RCRA CESQG – RCRA NON-GEN – BULK TERMINAL – REFN – FEMA Underground Storage Tank (UST)	0.25
Institutional Control/Engineering Control Registries	FED ENG – FED INST – FED Brownfields	0.5
Emergency Response Notification System (ERNS) List	ERNS – ERNS 1982 to 1986 – ERNS 1987 to 1989	Subject Property

Subject Property – The Subject Property is listed on the RCRA NON-GEN database as BAS Recycling, Inc., Lakin Tire West LLC, and First Industrial LP. The Subject Property is referenced with Handler IDs of CAL000343884, CAL000464375, CAL003141623, and CAL003142215 and with no reported violations. The Subject Property is not listed on Federal databases indicative of releases of hazardous substances or petroleum products to the subsurface. These listings are not considered to be recognized environmental conditions in connection with the Subject Property.

Adjoining Properties – Two adjoining properties are listed on the standard Federal ASTM regulatory databases as United Natural Foods Inc. (south adjoining 22150 Goldencrest Drive) and C5 Equipment Rentals LLC (west adjoining 21921 Alessandro Boulevard). These adjoining properties are listed on the RCRA NON-GEN database with no reported violations. These adjoining properties are not listed on Federal databases indicative of releases of hazardous substances or petroleum products to the subsurface and are not considered to be recognized environmental conditions to the Subject Property.

Other Properties – There are 15 listings on the standard Federal ASTM regulatory databases pertaining to multiple properties in the surrounding area including RCRA TSD (two listings), RCRA LQG (one listing), RCRA SQG (three listings) and RCRA NON-GEN (nine listings). None of these properties are considered a recognized environmental condition to the Subject Property. Our opinions regarding adjoining and nearby properties are based on the distance of the off-site listed properties



from the Subject Property, orientation of the listed properties relative to the Subject Property, interpreted direction of groundwater flow and/or regulatory case status information for the various properties as described in the databases.

As stated previously, March Air Force Base is situated in the near vicinity of the Subject Property (approximately 0.25 miles to the southeast). The Base was not identified in the ERIS database report due to its associated coordinates being located outside of the one-mile search radius. The base reportedly covers approximately 7,000 acres and has historically served as a training base and refueling operations base. Operations (including aircraft maintenance and repair) reportedly involved use and disposal of various chemicals and wastes including chlorinated solvents. Various areas of concern have been identified and affected by spills/releases from historical base operations. The Air Force is the responsible party for remediation and investigation pursuant to a 1995 Record of Decision under the oversight of the United States EPA, Regional Water Quality Control Board and Department of Toxic Substances Control. Three zones of groundwater contamination beneath the base were identified and wells on base were shut down in the late 1980s and were later properly destroyed. Groundwater contamination has migrated to wells located off base that are no longer in use. However, a groundwater containment system has been installed to prevent off-property groundwater migration and the off-property plume is being monitored. The base’s long-term cleanup is ongoing and more recent assessment work in connection with the base has focused on per- and polyfluoroalkyl substances (PFAS) as emerging contaminants of concern.

Primary areas of concern in connection with the base are known as Operable Units (OU). The closest OU to the Subject Property is identified as “OU2-A Site 11 Bulk Fuel Storage Area.” and is mapped approximately one-half mile to the southeast of the Subject Property. The myriad of other OUs are situated further from the Subject Property and all are situated hydrologically down-gradient from the Subject Property. Given the distance and location of the Subject Property relative to the various OUs, we have no basis to believe that the Subject Property has been impacted by PFAS or other contaminants resulting from current or former base operations. The March Air Force Base property is not considered to be a recognized environmental condition to the Subject Property.

The following State, Tribal and local standard ASTM databases were searched:

Standard Environmental Record Sources Name	ERIS Regulatory Database Identification	Search Distance From Subject Property (Miles)
Equivalent NPL	RESPONSE	1.0
Equivalent CERCLIS	ENVIROSTOR – DELISTED ENVS – HWP - HHSS	0.5
Landfill and/or Solid Waste Disposal Site Lists	SWF/LF – LDS – SWAT – SWRCB SWF	0.5
Leaking Storage Tank Lists	LUST – DELISTED LST – UST CLOSURE – CLEANUP SITES – INDIAN LUST – DELISTED ILST – RIVERSIDE LOP	0.5
Registered Storage Tank Lists	UST – AST – DELISTED TNK – CERS TANK – DELISTED CTNK – HIST TANK – INDIAN UST – DELISTED IUST – DELISTED COUNTY – UST RIVERSIDE	Subject Property and Adjoining Properties



Standard Environmental Record Sources Name	ERIS Regulatory Database Identification	Search Distance From Subject Property (Miles)
Institutional Control/Engineering Control Registries	LUR – HLUR - DEED	Subject Property
Voluntary Cleanup Sites	VCP	0.5
Brownfield Sites	Not Applicable – No Database Exists	0.5

Subject Property – The Subject Property is listed on the C&D DEBRIS RECY database as BAS Recycling, Inc., International Mulch Company, and Environmental Molding Concepts LLC. The listings identify business activities as tire-derived product manufacturing. No violations, spills, or releases are reported. The property is not listed on State, Tribal, or local databases indicative of releases of hazardous substances or petroleum products to the subsurface. These listings are not considered to be recognized environmental conditions in connection with the Subject Property.

Adjoining Properties – The following adjoining properties are listed on the State, Tribal and local standard ASTM regulatory databases:

- **United Natural Foods Inc. (22150 Goldencrest Drive)** – This south adjoining property is listed on the CERS TANK database. The database listing identifies minor violations related to the storage, reporting, employee training, and timely disposal of hazardous waste generated at this business. No releases have been reported and this property is not considered to be recognized environmental conditions to the Subject Property.
- **Tractorland Equipment Company / Alessandro Properties (21921 Alessandro Boulevard)** – This west adjoining property is listed on the DELISTED COUNTY, VCP, and ENVIROSTOR databases. This is an approximately 20-acre property used for heavy equipment storage, rental, repair, and maintenance. Notable features include two metal structures, a former dry cleaner along Alessandro Road, extensive soil staining in the western portion, and an equipment wash area with associated clarifier and leach lines. Soil, soil gas, and groundwater investigations at the property began in 2018, are on-going, and have identified contaminant impacts in all three media. Primary historical operations were located along Alessandro Road and Old 215 Frontage Road in the northern and western portions of the property, respectively (non-adjoining to the Subject Property and situated hydrologically down to cross gradient from the Subject Property). The southeastern portion of this property (adjoining the Subject Property) was historically used as a storage yard with no significant environmental concerns identified. This property is not considered to be a recognized environmental condition to the Subject Property.

Other Properties – There are 33 listings on the State, Tribal and local standard ASTM regulatory databases pertaining to multiple properties in the surrounding area including ENVIROSTOR (one listing), C&D DEBRIS RECY (one listing), RECYCLING (six listings), LUST (six listings), UST (one listing), HHSS (two listings), UST SWEEPS (two listings), CERS TANK (one listing), HIST TANK (two listings), DELISTED COUNTY (four listings), LOP RIVERSIDE (six listings), and UST RIVERSIDE (one listing). None of these properties are considered a recognized environmental condition to the Subject Property. Our opinions regarding adjoining and nearby properties are based on the distance of the off-site listed properties from the Subject Property, orientation of the listed properties relative to the Subject Property, interpreted direction of groundwater flow and/or regulatory case status information for the various properties as described in the databases.



5.2 Non-ASTM Regulatory Database Search

A myriad of non-ASTM regulatory databases was searched by ERIS as noted in the regulatory database report.

Subject Property – The Subject Property is listed on the FINDS/FRS, HAZNET, CERS HAZ, WASTE TIRE, RIVERSIDE HZH, and RIVERSIDE HWG non-ASTM regulatory databases as BAS Recycling, Inc. and John Sanga. The listings reference a RCRA EPA ID number of CAL000343884, an expired NPDES Permit No. CAZ428576, and the generation of various hazardous wastes including waste oil, organic solids, and unspecified organic liquid mixtures. Violations related to the NPDES permit are identified between October 2018 and January 2022 and reported on the Subject Property EPA Facility Report as “Other Violation” associated with the expired condition of the NPDES permit. The violations were administrative in nature and did not pertain to releases or other potential contamination. The database listings also identify minor violations related to the storage, reporting, employee training, and timely disposal of hazardous waste generated at the Subject Property. No chlorinated solvents are referenced as being part of Subject Property operations. The Subject Property is routinely inspected by the County of Riverside and only administrative related violations have reportedly been issued. No releases have been reported. These listings are not considered to be recognized environmental conditions in connection with the Subject Property.

Adjoining Properties – Two adjoining properties are listed on one or more of the non-ASTM databases as follows:

- **Redman Homes Inc.** (22201 Alessandro Boulevard) – This east adjoining property is listed on the EMISSIONS database. This property is not listed on databases indicative of releases of hazardous substances or petroleum products to the subsurface. This property is not considered to be a recognized environmental condition to the Subject Property.
- **United Natural Foods, Inc.** (22150 Goldencrest Drive) – This south adjoining property is listed on the RIVERSIDE HZH and HWG databases. These databases identify hazardous waste generation sites and facilities which are disclosed to the local (County of Riverside) Certified Unified Program Agency. This property is not listed on databases indicative of releases of hazardous substances or petroleum products to the subsurface. This property is not considered to be a recognized environmental condition to the Subject Property.

Other Properties – There are 25 listings on the non-ASTM regulatory databases pertaining to multiple properties in the surrounding area that are identified on various databases including FUDS (two listings), MRDS (three listings), CERS HAZ (one listing), DELISTED HAZ (one listing), EMISSIONS (14 listings), RIVERSIDE HWG (two listings), and RIVERSIDE HZH (two listings). None of these properties are considered a recognized environmental condition to the Subject Property. Our opinions regarding adjoining and nearby properties are based on the distance of the off-site listed properties from the Subject Property, orientation of the listed properties relative to the Subject Property, interpreted direction of groundwater flow and/or regulatory case status information for the various properties as described in the databases.

5.3 Regulatory Agency File Reviews

If a property being assessed under a Phase I ESA or any of the adjoining properties are identified on one or more of the above referenced standard environmental record sources, pertinent regulatory files and/or records associated with such listings should be reviewed to assist the environmental professional



in evaluating if recognized environmental conditions existing at a given subject property in connection with any listings. However, if in the environmental professional’s opinion, such a review is not warranted, file reviews need not be conducted if the environmental professional provides justification for not doing so.

Agency file reviews for the Subject Property completed during this assessment are noted below. No file reviews for adjoining properties or properties in the surrounding area were deemed warranted with the exception of research completed on the State Water Resources Control Board GeoTracker database regarding properties in the surrounding area of the Subject Property. The agency inquiries were performed by way of on-line searches/queries of published databases and/or direct inquiries with public records clerks at one or more agencies. Both Daniel Weis and Samantha Weis of Weis Environmental conducted the agency file reviews during the completion of this assessment. Copies of regulatory agency records are included in Appendix C.

Regulatory Agency	Jurisdiction	Date of Inquiry or Request	Contact	Response or Information From Agency
United States EPA Envirofacts/ECHO/ TRIS	Federal	01/13/2022	Online https://enviro.epa.gov/ https://echo.epa.gov/facilities/facility-search https://www.epa.gov/toxics-release-inventory-tri-program	Records Identified
California DTSC	State	12/23/2022	Online https://www.envirostor.dtsc.ca.gov/public https://hwts.dtsc.ca.gov/ Public Records Clerk	Records Identified
State Water Resources Control Board/Regional Water Quality Control Board	State	01/13/2022	Online https://geotracker.waterboards.ca.gov/ https://geotracker.waterboards.ca.gov/historical_ust_facilities Public Records Clerk	Records Identified
County of Riverside	Local	12/23/2021	Public Records Clerk	Records Identified
City of Moreno Valley	Local	12/23/2021	Public Records Clerk	Records Identified

United States EPA – Permit Compliance System / Integrated Compliance Information System (PCS/ICIS) and RCRA Info reports were identified for BAS Recycling, Inc. at 14050 Day Street. RCRA EPA Handler ID number of CAL000343884 and an expired NPDES Permit No. CAZ428576 were associated with the Subject Property. Information identified is consistent with the ERIS database report discussed above in Section 5.3.

California DTSC – The DTSC maintains copies of hazardous waste manifests pertaining to wastes removed from the Subject Property between 2010 and 2017. Between one and five manifests were



generated annually at the Subject Property during this period associated with the EPA ID No. CAL000343884. No chlorinated solvents are referenced as being part of Subject Property operations and no releases were reported. Information identified is consistent with the ERIS database report discussed above in Section 5.3.

Regional Water Quality Control Board – NPDES permit information is present in files for the Site, with information consistent with that discussed previously in this report.

County of Riverside – County files reference Thor Manufacturing/California as permitted entities for the Subject Property. The files contain various typical documents pertaining to hazardous waste and materials management including business plans, inventories, permits and inspection reports. Administrative related violations were issued pertaining to employee training, business plan corrections and other typical administrative related formalities. Hazardous wastes and/or materials noted in the files include solvent free paint cleaner, heat transfer oil, antifreeze, compressed gases, wood filler bond, adhesives, propane and diesel fuel (drum). No releases are noted in the County files.

City of Moreno Valley – City records pertaining to the Subject Property as provided to our firm include a list of various permits and documents including but not limited to construction of a new manufacturing building, utilities, signage, a spray booth, dust collection systems, certificates of occupancy and reports regarding a fire related incident and associated building damage. No recognized environmental conditions were noted in the records.

5.4 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the regulatory records searches. In addition, regulatory resources related to the adjoining properties and properties in the vicinity of the Subject Property do not represent recognized environmental conditions to the Subject Property.



6.0 HISTORICAL RESOURCE REVIEW

The objective of consulting historical sources is to develop a history of the previous uses of a property and surrounding area, in order to help identify the likelihood of past uses having led to recognized environmental conditions in connection with a given property. The goal of the historical research is to identify all obvious uses of a subject property from the present, back to the property’s first developed use, or back to 1940, whichever is earlier. The environmental professional exercises professional judgment in reviewing only as many of the standard historical sources referenced in ASTM E1527-21 that are deemed necessary, are reasonably ascertainable and are likely to be useful. Historical resources reviewed during the completion of this assessment are referenced below. Copies of the historical resources are included in Appendix D.

6.1 Aerial Photographs

We reviewed historical aerial photographs from the years 1938, 1953, 1967, 1977, 1989, 1994, 2002, and obtained by EDR. The table below presents the results of the photograph review.

Photograph Year	Subject Property Observations	Adjoining Property Observations
1938	The Subject Property is vacant land and potentially used for pasture purposes.	Adjoining properties are vacant and also potentially used for pasture purposes.
1953	A dirt road and graded area are present in the western portion of the Subject Property.	The western adjoining property has been graded and a dirt road is visible.
1967	The Subject Property is vacant. The graded area and dirt road are no longer visible.	The graded area and dirt road at the western adjoining property are no longer visible.
1977	The Subject Property structure is present. Surrounding areas are used as parking and minor storage.	Structures at the northern and eastern adjoining commercial/light industrial properties are present in current configurations.
1989 - 2005	The Subject Property is in its current configuration.	The western adjoining property is graded and fenced for use as a storage yard.

6.2 Topographic Maps

We reviewed topographic maps from the years 1901, 1947, 1953, 1967, and 1973 obtained by EDR.

- Beginning in 1901 until 1947, no structures or other features are depicted on the Subject Property or adjoining properties.
- In 1953 to 1973, an unspecified pipeline is depicted crossing the southern portion of the Subject Property. Review of historical aerial photographs suggests this pipeline was actually located south of the Subject Property.
- In 1973, the Subject Property structure is depicted. Structures at the northern and eastern adjoining properties are present and consistent with current configurations.



6.3 City Directories

We reviewed city directories dated ranging in date from 1971 to 2020 provided by ERIS. The Subject Property is first listed as Maestro Products, Inc. in 1998 to 2001 and later as Thor CA Mirage Division in 2006. Beginning in 2012, BAS Recycling, Inc. and a business identified as Environmental Molding Concepts are listed. Adjoining properties are not listed in the reviewed directories. None of the listings are considered a recognized environmental condition to the Subject Property.

6.4 Other Historical Sources

Other historical sources are referenced in the ASTM E1527-21 practice as any source or sources other than the standard historical sources referenced in the practice that are credible to a reasonable person and that identify past uses of a subject property. This category includes, but is not limited to miscellaneous maps and directories, newspaper archives, internet sites, community organizations, local libraries, historical societies, current owners or occupants of neighboring properties, or records in the files and/or personal knowledge of the property owner and/or occupants. No historical sources other than the standard sources described above were deemed necessary and useful to assist in identifying recognized environmental conditions.

6.5 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the historical resources reviewed. In addition, historical resources related to the adjoining properties and properties in the vicinity of the Subject Property did not reveal recognized environmental conditions to the Subject Property.



7.0 SUBJECT PROPERTY RECONNAISSANCE

The objective of the Subject Property reconnaissance is to obtain information indicating the likelihood of identifying recognized environmental conditions in connection with a subject property. The Subject Property visit for our assessment was completed on January 12, 2022, by Daniel Weis. We were unaccompanied during the reconnaissance.

7.1 Methodology and Limiting Conditions

The Subject Property reconnaissance consisted of observing the Subject Property on foot via various transects and walking publicly accessible areas surrounding the Subject Property. The interior of the primary Subject Property building was also accessed. No significant limiting conditions of the Subject Property inspection were noted. Select photographs of the Subject Property obtained during the Subject Property reconnaissance are included in Appendix E.

7.2 Current General Subject Property and Vicinity Characteristics

The Subject Property is situated in an area of Moreno Valley comprised primarily of commercial and light industrial properties, vacant land, and public roadways. March Air Force Base is situated to the southeast of the Subject Property. The Subject Property is currently utilized for rubber recycling, storage, and office space by BAS Recycling, Inc. Specifically, facility operations include the manufacturing of recycled ground rubber from scrap tires. Products produced include playground cover, synthetic sports fields, rubberized asphalt concrete, colorized rubber mulch, injection molded products, and tire-derived aggregate. The current use of the Subject Property 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 impacted the Subject Property.

7.3 Indications of Past Subject Property and Vicinity Uses

There are no material differences between the current and past uses of the Subject Property, adjoining properties and the surrounding area Subject Property that were visually and/or physically observed during the Subject Property reconnaissance that pertain to recognized environmental conditions.

7.4 Subject Property-Specific Observations

We examined the Subject Property for the features and conditions noted in the table below.



Feature or Condition	Details
General Description of Structures	The Subject Property is developed with a one-story light industrial warehouse building with a mezzanine level. The building is an estimated 63,000 square feet and was reportedly constructed in 1973. The structure appears to be of corrugated steel construction and situated on a concrete slab-on-grade foundation. Two 11,000-gallon refrigerated nitrogen above-ground storage tanks are located along the northern exterior of the structure. Various equipment associated with Subject Property operations are present throughout the interior of the building and portions of the exterior lot areas. Other portions of the Subject Property consist of asphalt- and concrete-paved driveways, parking and storage areas, shipping/receiving areas, and minor landscaping. Access to the Subject Property is provided by Day Street. Indicators of various utility systems are also present throughout the Subject Property.
Drains and Sumps	Typical exterior area drains and interior floor drains are present at the Subject Property. No staining, odors or other suspect conditions were noted.
Heating/Cooling Systems	Conventional roof-mounted systems.
Potable Water Supply	Eastern Municipal Water District.
Roads	Access to the Subject Property is from Day Street.
Septic Systems / Sewage Disposal System	Eastern Municipal Water District.
Wastewater and Stormwater Discharges	None observed.
Wells	None observed.
Drums	Several 55-gallon drums are present at the Subject Property. There is a small canopy area above a concrete slab that is used for the storage of used oil. Five 55-gallon drums and one approximately 15 to 20 gallon drums were observed in this area. Three of the 55-gallon drums were on a secondary containment pallet. The other three drums were on the concrete paving. Several 55-gallon drums of polyurethane binder were also observed on pallets within the Subject Property building and a few empty 55-gallon plastic drums used to store trash and general refuse were observed in the exterior lot areas. No significant staining, odors or other suspect conditions were noted.
Electrical or Hydraulic Equipment Known to Contain PCBs or Likely to Contain PCBs	None observed.
Hazardous Substances and Petroleum Products in Connection with Identified Uses	Please refer to the "drums" section above. Several five-gallon buckets of oil/petroleum and bonding related products were also observed within interior and exterior areas of the Subject Property. Several locked cabinets are also present within the Subject Property building. According to the Subject Property tenant representative, these cabinets are either empty or used to store retail-sized containers of oil, paint and bonding/adhesive related products. No significant staining, odors or other suspect conditions were noted.
Hazardous Substance and Petroleum Products Not Necessarily in Connection With Identified Uses	None observed.



Feature or Condition	Details
Odors	None noted.
Pits, Ponds or Lagoons	None observed.
Pools of Liquid	None observed.
Solid Waste (Including Fill Material)	Stored in conventional dumpsters. In addition, several piles of shredded tires, various pieces of equipment (some non-operational) and various debris are present throughout the exterior areas of the Subject Property. No significant staining, odors or other suspect conditions were noted.
Stained Soil or Pavement	A relatively limited area of concrete stained with oil is present adjacent to the drums within the canopy area in the northwest corner of the Subject Property. This is considered to be a de minimus condition. Typical oil staining (also de minimus) was also observed in several interior and exterior areas of the Subject Property (asphalt and concrete paved surfaces).
Stains or Corrosion	None observed.
Chemical Storage Tanks	Two 11,000-gallon refrigerated nitrogen above-ground storage tanks are located along the northern exterior of the structure. These are not considered to be recognized environmental conditions.
Stressed Vegetation	None observed.
Unidentified Substance Containers	None observed.

7.5 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the current use of the Subject Property during the Subject Property reconnaissance. In addition, no current uses of the adjoining properties or properties in the surrounding area that were visually and/or physically observed during the Subject Property reconnaissance were noted as recognized environmental conditions to the Subject Property.



8.0 INTERVIEWS

8.1 Subject Property Owner

The Subject Property is currently owned and managed by First Industrial Realty Trust (owner since 2008). The owner is unaware of environmental concerns in connection with the Subject Property.

8.2 Key Site Manager

The Subject Property owner is also considered to be the Key Site Manager. Please refer to Section 8.1 above.

8.3 Current Occupants

The Subject Property is currently occupied by BAS Recycling, Inc. A representative of the tenant was interviewed during the Subject Property reconnaissance and is unaware of environmental concerns in connection with the Subject Property.

8.4 Local Government Official

During the preparation of this assessment, public records clerks from the City of Moreno Valley, State of California and Riverside County were contacted by our firm regarding the Subject Property. Agency representatives indicated that public records requests should be conducted in order to obtain information known by the agencies regarding the Subject Property. Public records requests were completed by our firm as described in Section 5.3.

8.5 Other Parties

Interviews with other persons were not conducted during the preparation of this assessment. As stated in the ASTM E1527-21 practice, interviews with past owners, operators and occupants of a subject property who are likely to have material information regarding the potential for contamination at a given property shall be conducted to the extent that they have been identified and that the information likely to be obtained is not duplicative of information already obtained from other sources. Interviews with persons with past association with the Subject Property were not deemed warranted during the completion of this assessment.

8.6 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the interviews completed during the assessment.



9.0 ADDITIONAL SERVICES – NON-SCOPE ASTM CONSIDERATIONS

Several non-scope ASTM considerations are referenced in the ASTM E1527-21 practice that a user of a report may wish to evaluate. Listed considerations in the practice include asbestos-containing building materials, biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, indoor air quality (unrelated to releases of hazardous substances or petroleum products into the environment), industrial hygiene, lead-based paint, lead in drinking water, mold, radon, regulatory compliance and wetlands. No implication is intended by the practice as to the relative importance of inquiry into such non-scope considerations, and the list of considerations is not intended to be all-inclusive.

Asbestos and Lead-Based Paint – An asbestos and lead-based paint survey has been prepared and submitted to the client under separate cover. No asbestos was identified and minimal lead-based paint identified was in fair to good condition and does not require abatement prior to future demolition activities.

Landmark/Historical/Cultural Significance Review - Archeological/cultural and paleontological assessments of the Subject Property have been completed concurrently with this Phase I ESA. The results of the studies have been provided to the client under separate cover. No significant findings were reported.

Lead in Drinking Water - According to the most recent water quality report prepared by the Eastern Municipal Water District, the drinking water supplied to the area is in compliance with all Federal and State regulations.

National Pollution Discharge Elimination System (NPDES) – The Subject Property has been subject to the California State Water Resources Control Board general NPDES permit for industrial activities since 2012. There have been no reported incidents of substantial noncompliance associated with the Subject Property. Reported violations were administrative in nature and did not pertain to releases or other potential contamination. The current notice of intent for permitted activities was filed by Lakin Tire West LLC/BAS Recycling in July 2021.

PFAS – There are no historical or current Subject Property or adjoining property uses that are indicative of scenarios where releases of such compounds have occurred.

Pipelines – Based on a review of the National Pipeline Mapping System. No pipelines used for the conveyance of oil, gas or other hazardous substances are present at the Subject Property. A natural gas pipeline is mapped just south of the Subject Property.

Radon Potential - The Subject Property is located within United States EPA Radon Zone 2 which has predicted average indoor levels of radon between 2 and 4 picocuries per liter. Radon is not considered to be a concern at the Subject Property.

Wellfield/Groundwater Protection Areas – The Subject Property is not situated in a known wellfield/groundwater protection area.

Wetlands and Threatened/Endangered Species - A biological assessment of the Subject Property has been completed concurrently with this Phase I ESA. The results of the study have been provided to the client under separate cover. No wetlands were noted at the Subject Property and no significant biological findings were reported.

No other additional services were completed by our firm during the preparation of this assessment.



10.0 FINDINGS AND OPINIONS

No features and/or conditions indicating the presence or likely presence of hazardous substances and/or petroleum products at the Subject Property that are considered to have the potential to adversely impact the Subject Property were identified during the completion of this assessment.



11.0 CONCLUSIONS AND RECOMMENDATIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM International Practice E1527-21 of the Subject Property located at 14050 Day Street in the City of Moreno Valley, California (Riverside County APN 297-130-036). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report. This assessment has revealed no evidence of recognized environmental conditions, controlled recognized environmental conditions or historical recognized environmental conditions in connection with the Subject Property. Additional assessment at the Subject Property is not considered to be warranted at this time.



12.0 ENVIRONMENTAL PROFESSIONAL STATEMENT

I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in Section 312.10 of 40 CFR. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. I have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Qualifications of personnel involved with the completion of this report are included in Appendix F.

A handwritten signature in black ink that reads "Daniel Weis". The signature is written in a cursive style with a large initial "D" and "W".

Daniel Weis, R.E.H.S.
Environmental Manager



13.0 ASSUMPTIONS

No Phase I ESA effort can eliminate uncertainty regarding the potential for recognized environmental conditions to exist in connection with a given property. Performance of the ASTM E1527-21 practice may reduce such uncertainty but in no way should the findings and report be misconstrued as insurance or a guarantee regarding the potential for recognized environmental conditions in connection with a given property. The ASTM E1527-21 practice recognizes reasonable limits of time and cost relative to the completion of a Phase I ESA.

During the completion of this ESA, our firm relied on certain information obtained from secondary sources, including but not limited to the user of the report, government agencies, historical research business entities, environmental databases, and interviews with one or more persons. The sources obtained and/or consulted are assumed to be reliable. However, our firm cannot warranty or guarantee that the information provided by these other sources is wholly accurate or complete. Our firm is not responsible for any misrepresentations or false statements that may be provided by others or the lack of pertinent/relevant information that should have been provided/disclosed by others and we assume no responsibility for any consequence as a result of such omissions or withheld information.

Accuracy and completeness of records varies among information sources, including from governmental agencies. As a result, there is a possibility that even with the proper application of the methodologies presented in ASTM E1527-21, conditions may exist that could not be identified within the scope of this assessment or which were not reasonably identifiable from the available information. In addition, any responses received from Federal, State, Tribal, and local regulatory agency secondary sources of information after the issuance of this report may change certain findings and conclusions of this report.

Estimations and opinions regarding the potential for off-site properties to adversely impact a given subject property is one of the key components of a Phase I ESA. In most cases, recent property-specific or adjacent-property specific measured groundwater data or other hydrogeological information is not reasonably ascertainable. In the absence of such data, reasonable assumptions regarding the depth and flow of groundwater are made based on various sources including comparisons to surface elevations, land topography and available hydrogeological on the State of California Geotracker database. In addition, estimations and opinions regarding potential impacts from off-site locations may be based on certain assumptions that a hazardous substance or petroleum product may not migrate laterally within unsaturated soil for a substantial distance and that contaminants that have reached saturated soil and groundwater may attenuate over time and/or may decrease in concentration relative to distance from its source. While any interpretations presented herein may be effective in reducing uncertainty regarding potential impacts to a subject property from off-site locations, in no way should the findings and report be misconstrued as insurance or a guarantee regarding the potential for such impacts to occur. Greater certainty regarding subsurface conditions at a given property can only be achieved by way of a subsurface sampling effort of one or more media.



14.0 DEFINITIONS

Definitions of key terminology relevant to the ASTM E1527-21 practice are presented below.

Recognized Environmental Condition - 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.

Controlled Recognized Environmental Condition - A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

Data Failure - A failure to achieve the historical research objectives as outlined in the ASTM E1527-21 practice even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Data failure is one type of data gap.

Data Gap - A lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by the ASTM E1527-21 practice, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.). Data gaps are only considered to be significant if they affect the ability of the environmental professional to identify recognized environmental conditions.

De Minimis Condition - A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.

Environment - (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act [16 U.S.C. §§ 1801 et seq.], and (B) any other surface water, groundwater, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.

Good Faith - The absence of any intention to seek an unfair advantage or to defraud another party; an honest and sincere intention to fulfill one's obligations in the conduct or transaction concerned.

Hazardous Substance - Includes hazardous substances designated under section 311 of the Clean Water Act (CWA) or Section 102 of CERCLA, any toxic pollutant listed under Section 307(a) of the CWA, any waste that has been listed as a RCRA hazardous waste or possesses a RCRA hazardous waste characteristic, any substance that is identified as a hazardous pollutant under Section 112 of the Clean Air Act (CAA), and any imminently hazardous chemical that EPA has taken action pursuant to Section 7 of the Toxic Substances Control Act (TSCA).

Historical Recognized Environmental Condition - A past release of any hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority or



meeting unrestricted use criteria established by a regulatory authority, without subjecting the property in question to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

Petroleum Exclusion – While the definition of a CERCLA hazardous substance specifically excludes petroleum products and crude oil, the EPA has determined that the petroleum exclusion applies to petroleum products such as gasoline and other fuels containing lead, benzene or other hazardous substances that are normally added during the refining process. Notwithstanding the existence of the petroleum exclusion, petroleum products are included within the scope of the ASTM E1527-21 practice for multiple reasons. Petroleum products have historically been widely used at commercial properties. In addition, other federal and state laws may impose liability for releases or spills of petroleum products.

Reasonably Ascertainable Information - Information that is (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints and (3) practically reviewable.

Release or Threatened Release - Spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment (including the abandonment or discarding of barrels, containers and other closed receptacles containing any hazardous substance, or pollutant or contaminant).



15.0 REFERENCES

Sources of information consulted during the completion of our Phase I ESA are noted in the sections below.

15.1 Documents, Plans and Reports

- All Appropriate Inquiry” as necessary to satisfy the defenses available under 42 U.S.C. §§ 9607(b)(3), 9607(r)(1), and 9607(q), relying on definitions provided at 42 U.S.C. §§ 9601(35)(B); and as further explained in 40 CFR §§ 312.1 – 312.31.
- ASTM International, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," ASTM Designation E 1527-21, 2021
- California Geological Survey, 2002, California Geomorphic Provinces Note 36, Electronic Copy, Revised December.
- California State Water Resources Control Board, Water Quality Control Plan for the Santa Ana River Basin (8), California, Published 2008.
- ERIS Database Report dated December 29, 2021.
- ERIS City Directory Report dated January 4, 2022.
- Prior environmental reports noted in Section 4.10.
- USGS topographic map, Riverside East, California Quadrangle (2018).

15.2 Personal Communications

- Public Records Clerks – City of Moreno Valley, County of Riverside and State of California

15.3 Agencies Consulted

- California Department of Conservation, Geologic Energy Management Division (CalGEM)
- California Department of Toxic Substances Control
- California State Water Resources Control Board
- City of Moreno Valley
- County of Riverside
- United States EPA



FIGURES

FIGURE 1
VICINITY MAP

FIGURE 2
SITE PLAN

FIGURE 3
TOPOGRAPHIC MAP

APPENDICES

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USER PROVIDED INFORMATION

APPENDIX B
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REGULATORY AGENCY RECORDS

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