Appendix I
Phase II Environmental Site Assessment

Orion Environmental Inc.
2955 Redondo Avenue
Long Beach, CA 90806
562 988-2755 PHONE
562 988-2759 FAX

DBA Arctos Environmental
2332 5th Street, Suite B
Berkeley, CA 94710
510 525-2180 PHONE
510 525-2392 FAX

15 June 2022
Project No. 84WRR2

Scannell Properties #669, LLC
8801 River Crossing Boulevard, Suite 300
Indianapolis, Indiana 46240
Attn: Jay Tanjuan

Subject: **Phase II Environmental Site Assessment Addendum**
2720 South Willow Avenue
Rialto, California

Dear Mr. Tanjuan:

Orion Environmental Inc., at the request of Scannell Properties #669, LLC (Scannell), has prepared this report as an addendum to the Phase II Environmental Site Assessment (ESA) report dated 11 May 2022. The Subject Property is located at 2720 South Willow Avenue in Rialto, California and is an approximately 3.5-acre parcel identified by San Bernardino County Assessor's Parcel Number 0258-171-57-0000. This addendum summarizes the results of the Phase II ESA and the environmental assessment and remediation activities recommended to develop the property to include a 120,000-square-foot industrial building based on the available data.

Phase II ESA Summary

The Subject Property is located in a developed area of Rialto predominantly characterized by industrial/commercial developments that surround the property to the north, south, east, and west. The Subject Property currently includes two industrial buildings that store and manufacture resins and epoxies. Current site activities use and store significant quantities of chemicals containing volatile organic compounds (VOCs) that may have impacted shallow soils and could result in potential environmental exposures to future occupants at the Subject Property. A historical records review indicated that large-scale orchards were present at the Subject Property and at adjoining and nearby properties from at least the 1930's until the 1990's. Orchards are known to require heavy applications of pesticides and herbicides which could have resulted in a potential release of hazardous materials to the environment. Orion's Phase I ESA identified one recognized environmental condition (REC) and one vapor encroachment condition (VEC):

- REC: Agricultural chemicals (pesticides and herbicides) in shallow soil from historical orchards

- VEC: VOCs in soil vapor from chemical storage and mixing.

Orion performed a limited Phase II ESA at the Subject Property in April 2022. The objective of the Phase II ESA was to conduct shallow soil and soil vapor testing to evaluate whether significant releases of hazardous substances from historical onsite operations, including VOCs, have occurred at the Subject Property. The Phase II ESA included the collection of 19 soil samples and 9 soil vapor samples at the Subject Property. The results of the Phase II ESA support the following observations and/or conclusions:

1. Concentrations of metals, herbicides, organochlorine pesticides, and organophosphate pesticides in shallow soil were below background or regulatory screening levels for human health risks associated with direct contact under commercial/industrial land use and not a likely risk for groundwater.

2. Soil vapor sampling results indicated that VOCs, except benzene and ethylbenzene, were below commercial/industrial screening levels for human health risks associated with vapor intrusion to indoor air.

3. Benzene and ethylbenzene soil vapor sampling results were above commercial/industrial screening levels in samples surrounding the Dura Technologies building. Orion was not able to collect samples below the Dura Technologies building, where chemicals are used and stored during site operations.

Based on the results of the Phase II ESA, historical activities at the Subject Property may have resulted in the release of hazardous materials with impacts exceeding screening levels considered protective of human health and the environment. As part of site redevelopment plans, Orion recommended (1) additional sampling below the Dura Technologies building, when accessible, and (2) the installation of a vapor barrier and collection system under future buildings to protect building occupants from potential human health risks to indoor air via the vapor intrusion pathway.

Assessment and Remediation Recommendations

Based on the available data, future development of the Subject Property with a 120,000-square-foot industrial warehouse should be feasible following the implementation of the following scope of work:

- Performing additional delineation to define the total lateral and vertical extent of VOC concentrations in soil and soil vapor when the Dura Technologies building is accessible to complete data gaps

- Conducting a Human Health Screening Risk Evaluation (HHSRE), as defined in DTSC's 2015 Preliminary Environmental Assessment Guidance Manual. The purpose of the HHSRE would be to define the chemicals of concern, the risk-drivers, the complete exposure pathways, and the potential need for mitigation and/or remediation to protect future workers and users of the Subject Property

- Completing the design and installation of a sub-slab vapor intrusion mitigation system during site development, if required based on the results of the additional sampling and HHSRE.

Orion estimated a range of costs from approximately $738,000 to $870,000 to implement this scope of work as detailed in a memorandum dated 13 May 2022 and included as Attachment A.

We appreciate the opportunity to provide environmental services to Scannell. If you have questions or comments regarding this report, please contact Mike Purchase at (562) 988-2855 or at mpurchase@orionenv.com.

Very truly yours,

ORION ENVIRONMENTAL INC.

Michael P. Purchase, P.E.
Vice President

Attachments: Attachment A – Remediation Cost Estimate Memorandum

ATTACHMENT A

REMEDIATION COST ESTIMATE MEMORANDUM

Orion Environmental Inc.
2955 Redondo Avenue
Long Beach, CA 90806
562 988-2755 PHONE
562 988-2759 FAX

DBA Arctos Environmental
2332 5th Street, Suite A
Berkeley, CA 94710
510 525-2180 PHONE
510 525-2392 FAX

Memorandum

To: Scannell Properties #669, LLC
Attn: Jay Tanjuan

From: Michael Purchase, Orion Environmental Inc.

Date: 13 May 2022

Subject: Remediation Cost Estimate
2720 South Willow Avenue
Rialto, California

Orion Environmental Inc. (Orion), at the request of Scannell Properties #669, LLC (Scannell), has prepared this memorandum to summarize the remediation cost estimate for the Subject Property. The Subject Property is located at 2720 South Willow Avenue in Rialto, California and is an approximately 3.5-acre parcel identified by San Bernardino County Assessor's Parcel Number (APN) 0258-171-57-0000. Redevelopment plans for the Subject Property are reported to include a 120,000-square-foot industrial building.

Background

The Subject Property is located in a developed area of Rialto predominantly characterized by industrial/commercial developments that surround the property to the north, south, east, and west. The Subject Property currently includes two industrial buildings that store and manufacture resins and epoxies. Current site activities use and store significant quantities of chemicals containing volatile organic compounds (VOCs) that may have impacted shallow soils and could result in potential environmental exposures to future occupants at the Subject Property. A historical records review indicated that large-scale orchards were present at the Subject Property and at adjoining and nearby properties from at least the 1930's until the 1990's. Orchards are known to require heavy applications of pesticides and herbicides which could have resulted in a potential release of hazardous materials to the environment. Orion's Phase I Environmental Site Assessment (ESA) identified one recognized environmental condition (REC) and one vapor encroachment condition (VEC):

- REC: Agricultural chemicals (pesticides and herbicides) in shallow soil from historical orchards
- VEC: VOCs in soil vapor from chemical storage and mixing.

Orion performed a limited Phase II ESA at the Subject Property in April 2022. The objective of the Phase II ESA was to conduct shallow soil and soil vapor testing to evaluate whether significant releases of hazardous substances from historical onsite operations, including VOCs, have occurred at the Subject Property. The Phase II ESA included the collection of 19 soil samples and 9 soil vapor samples at the Subject Property. The results of the Phase II ESA support the following observations and/or conclusions:

1. Concentrations of metals, herbicides, organochlorine pesticides (OCPs), and organophosphate pesticides (OPPs) in shallow soil were below background or regulatory screening levels for human health risks associated with direct contact under commercial/industrial land use and not a likely risk for groundwater.

2. Soil vapor sampling results indicated that VOCs, except benzene and ethylbenzene, were below commercial/industrial screening levels for human health risks associated with vapor intrusion to indoor air.

3. Benzene and ethylbenzene soil vapor sampling results were above commercial/industrial screening levels in samples surrounding the Dura Technologies building. Orion was not able to collect samples below the Dura Technologies building, where chemicals are used and stored during site operations.

Based on the results of the Phase II ESA, historical activities at the Subject Property may have resulted in the release of hazardous materials with impacts exceeding screening levels considered protective of human health and the environment. As part of site redevelopment plans, Orion recommended (1) additional sampling below the Dura Technologies building, when accessible, and (2) the installation of a vapor barrier and collection system under future buildings to protect building occupants from potential human health risks to indoor air via the vapor intrusion pathway.

Remediation Implementation

Based on the available data, future development of the Subject Property with a 120,000-square-foot industrial warehouse should be feasible following the implementation of the following scope of work:

- Performing additional delineation to define the total lateral and vertical extent of VOC concentrations in soil and soil vapor

- Conducting a Human Health Screening Risk Evaluation (HHSRE), as defined in DTSC's 2015 Preliminary Environmental Assessment (PEA) Guidance

Manual. The purpose of the HHSRE would be to define the chemicals of concern (COCs), the risk-drivers, the complete exposure pathways, and the potential need for mitigation and/or remediation to protect future workers and users of the Subject Property

- Completing the design and installation of a sub-slab vapor intrusion mitigation system (VIMS) during site development.

The proposed path forward assumes that the aforementioned testing, analysis, and HHSRE would be completed as part of a Supplemental Site Investigation (SSI) that would be reviewed and approved by a regulatory agency. Based on current COCs present, Orion assumes that impacts to soil and soil vapor can be mitigated through design and construction of a VIMS and no active remediation or removal action(s) appear warranted. Orion assumes that any targeted removal of impacted shallow soils identified below existing buildings could be conducted as part of site development activities.

Orion recommends that Scannell engage a regulatory agency that is familiar and comfortable with the risk-based corrective action process, such as the California Department of Toxic Substances Control (DTSC), to receive agency approval of the final remediation implementation. Risk and risk-mitigation, not compliance with screening level concentrations, should drive the remedial approach for the Site.

Remedial Implementation Steps and Timeline

The following steps, with estimated costs, assuming DTSC oversight, will be completed to receive regulatory approval and installation of the VIMS.

Task	Cost Estimate ($)
Engagement of DTSC	10,000
SSI/HHSRE completion	60,000 to 90,000
Agency approval of SSI/HHSRE	
Removal action workplan (RAW) preparation and negotiation with agency	20,000
Agency approval of RAW	
Public participation	15,000
Remedial design implementation plan preparation and negotiation with agency	25,000
Agency approval of remedial design implementation plan	

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11 May 2022
Project No. 84WRR2

Scannell Properties, LLC
8801 River Crossing Boulevard, Suite 300
Indianapolis, Indiana 46240
Attn: Jay Tanjuan

Subject: Phase II Environmental Site Assessment
2720 South Willow Avenue
Rialto, California

Dear Mr. Tanjuan:

Orion Environmental Inc., at the request of Scannell Properties, LLC (Scannell), has prepared this report documenting a Phase II Environmental Site Assessment (ESA) for the approximately 3.5-acre property identified by San Bernardino County Assessor's Parcel Number (APN) 0258-171-57-0000. The parcel is located at 2720 South Willow Avenue in Rialto, California (Subject Property; Figure 1). The work was conducted in general accordance with Orion's proposal dated 1 April 2022.

The Phase II ESA was conducted to identify potential releases of hazardous materials associated with recognized environmental conditions (RECs) previously identified in a Phase I ESA. Information regarding reliance on and limitations of this Phase II ESA are in Attachment A.

Site Background

The Subject Property is located in a developed area of Rialto predominantly characterized by industrial/commercial developments surrounding to the north, south, east, and west. The Subject Property consists of one parcel with an area of approximately 3.5 acres identified by San Bernardino County APN 0258-171-57-0000. The Subject Property currently includes two industrial buildings that store and manufacture resins and epoxies. Based on subsurface investigations conducted in the vicinity of the Subject Property, regional groundwater is estimated to be at a depth of approximately 160 feet below ground surface (bgs) with first groundwater in a perched aquifer from 95 to 100 feet bgs (AECOM, 2022).

Orion performed a Phase I ESA of the Subject Property in April 2022. A historical records review indicated that large-scale orchards were present from at least the 1930's until the 1990's at the Subject Property and at adjoining and nearby properties. Orchards are known

to require heavy applications of pesticides and herbicides resulting in a potential release of hazardous materials to the environment. Current site activities use and store significant quantities of chemicals containing volatile organic compounds (VOCs) that may impact shallow soils and cause environmental exposure to future occupants of the Subject Property. After completing the Phase I ESA, Orion identified one REC and one vapor encroachment condition (VEC; Orion, 2022):

- REC: Agricultural chemicals (pesticides and herbicides) in shall soil from historical orchards
- VEC: VOCs in soil vapor from chemical storage and mixing.

Based on the results of the Phase I ESA, Orion recommended conducting a Phase II ESA to evaluate whether potential impacts to surficial soil and soil vapor are present at the Subject Property from the discharge of hazardous materials from current or historical site activities. The Phase II investigation activities focused on surficial soil and shallow soil vapor based on the potential exposure pathways to future occupants given the planned property use.

Objective and Scope of Work

The objective of the Phase II ESA was to conduct shallow soil and subsurface soil vapor testing to evaluate whether significant releases of hazardous substances, including VOCs, have occurred at the Subject Property as a result of historical onsite operations. The work was focused on the RECs identified in the Phase I ESA and potential releases were evaluated assuming that the Subject Property would be developed for commercial/industrial land use. To meet this objective, Orion performed the following scope.

- Mobilized for field activities including preparing a site-specific Health and Safety Plan and coordinating access with the property owner and tenants
- Marked the property for Underground Service Alert (USA) and notified USA to mark underground utilities
- Collected two shallow 1-foot-deep soil samples at 19 locations to create one composite sample and one duplicate composite sample
- Installed temporary 5-foot soil vapor sampling vapor probes at nine locations
- Conducted a soil gas survey that included the collection of vapor samples from the nine temporary soil vapor probes
- Submitted the soil and soil vapor samples to a California-certified laboratory for analysis
- Removed temporary vapor probes, backfilled borings with Portland cement grout, and completed surfaces to match existing conditions

- Evaluated the field and analytical results and prepared this summary report.

The current property owner did not allow access to sample within the Dura Technologies building located in the center of the Subject Property. During site reconnaissance, significant chemicals were observed to be used and stored within the building as part of the manufacturing of resins and epoxies. Due to this access limitation, samples were not collected at the REC (chemical storage and mixing areas inside the building; see Figure 2).

Orion conducted this Phase II ESA in general accordance with the scope and limitations of ASTM International *Standard Practice for ESAs* (E1903-19) unless otherwise noted (ASTM, 2020).

Screening Criteria

Data collected for the Phase II ESA were evaluated against several commonly used criteria in California. The following soil and soil vapor criteria were used to evaluate the sample results.

Soil Criteria
Soil sampling results were compared to the following State and Federal screening levels to assess whether detectable concentrations would present a possible human health risk:

- California Department of Toxic Substances Control (DTSC) Human and Ecological Risk Office's Modified Screening Levels (SLs) for commercial/industrial land use (DTSC, 2020)
- U.S. Environmental Protection Agency (EPA) Regional Screening Levels (RSLs) for (1) commercial/industrial land use and (2) soil leaching to groundwater (EPA, 2021)
- Typical background concentrations of heavy metals in California soils.

Typical background concentrations of naturally occurring metals in California soils were compiled and published in studies by the University of California Kearney Foundation of Soil Science and DTSC (Bradford et al., 1996; Chernoff et al., 2008).

Soil Vapor Criteria
Orion used DTSC SL and EPA RSL indoor air criteria for commercial/industrial land use to calculate screening levels for soil vapor for the purposes of this Phase II ESA. The DTSC SLs and EPA RSLs provide human health risk criteria based on exposure to indoor air at commercial/industrial properties. Soil vapor screening levels are determined by dividing indoor air screening levels by a recommended attenuation factor of 0.03 (EPA, 2015). Soil

vapor analytical results for VOCs were compared to screening levels calculated using the attenuated indoor air human health risk criteria for DTSC SLs and EPA RSLs.

Phase II ESA Procedures

The following sections summarize the field procedures, analytical program, and waste disposal program executed as part of this Phase II ESA. Soil and soil vapor sampling locations are shown on Figure 2.

Temporary soil vapor probe installation and sampling were performed in general accordance with DTSC's advisory for active soil vapor investigations (DTSC, 2015). Field activities were completed in general accordance with the quality assurance/quality control (QA/QC) procedures in Attachment B.

Surficial Soil Sample Collection and Compositing
On 12 April 2012, Orion and Core Probe International, Inc. (Core Probe), of San Gabriel, California, collected surficial soil samples using hand auger or direct-push cuttings from a depth of approximately 0 to 2 feet bgs at 19 locations. At each location, a sample was collected and split into separate containers for composited sample analysis following standard incremental sampling methodology. A total of two duplicate samples were analyzed for the site.

Soil Vapor Sampling
On 12 April 2022, Core Probe installed nine soil vapor probes at the Subject Property (Figure 2). The borings were advanced using a direct-push drill rig to a total depth of 5 feet bgs to install temporary soil vapor probes. Vapor probes were constructed in each borehole using 1/4-inch outside-diameter Nylaflow tubing with a 6-inch-long stainless-steel vapor filter. The annular space was backfilled to encase the filter in approximately 1 foot of sand pack. Approximately 1 foot of dry granular bentonite was added on top of the sand pack. Each boring location was completed by adding bentonite grout from approximately 3.5 feet bgs to the ground surface.

On 13 April 2022, Orion conducted a soil gas survey including the collection of soil vapor samples from the nine temporary soil gas probes. No significant rainfall events, which are defined by DTSC as greater than 0.5 inch in a 24-hour period, occurred within 24 hours preceding the sampling event. Before purging and sampling, Orion performed a shut-in test at each vapor probe to check for leaks in the aboveground sampling system. Orion assembled the aboveground sampling system and applied a vacuum of approximately 10 inches of mercury at each location. The applied vacuum was maintained for at least 30 seconds during all shut-in tests, indicating that the aboveground sampling system did not contain leaks.

Before sample collection, a minimum of 3 casing volumes of soil vapor were purged from each probe. During purging, Orion applied 1,1-difluoroethane (1,1-DFA) near the fittings and tubing at the surface of the vapor probes as a leak detection compound. Samples were collected using 1-liter SUMMA® canisters equipped with flow regulators calibrated to collect vapor at a flow rate of less than 200 milliliters per minute. After sample collection, the temporary soil vapor probes were decommissioned by manually removing the tubing. Borings were completed at the surface with either concrete or native soil to match existing conditions.

Analytical Program

A total of two soil samples were collected and submitted for analysis to Positive Lab Service (Positive), a California-certified laboratory located in Los Angeles, California. Positive analyzed the soil samples for the following chemicals:

- Organochlorine pesticides (OCPs) by EPA Method 8081A
- Organophosphorus pesticides (OPPs) by EPA Method 8141A
- Herbicides by EPA Method 8151A
- California Code of Regulations Title 22 (Title 22) metals by EPA Methods 6010B and 7471A.

A total of nine soil vapor samples were collected and submitted for analysis to Air Technology Laboratories, Inc. (Air Technology), a California-certified analytical laboratory located in City of Industry, California. Air Technology analyzed the soil vapor samples for VOCs by EPA Method TO-15, including 1,1-DFA. The soil vapor samples were analyzed for 1,1-DFA to identify samples with potential surface seal leaks.

Laboratory analytical QA/QC procedures are described in Attachment B. Laboratory analytical reports and chain-of-custody forms are in Attachment C.

Waste Characterization and Disposal

Solid wastes such as used personal protective equipment, paper towels, trash bags, and any other solid debris were collected for disposal as municipal trash. Soil generated during vapor probe installation and sampling activities were segregated and placed in a drum approved by the U.S. Department of Transportation. The drum was labeled and stored on site until disposal. Soil will be profiled and managed as investigation-derived waste (IDW) in accordance with California and Federal guidelines.

Phase II ESA Results

Results of shallow soil and soil vapor samples collected during the Phase II ESA are summarized in the following sections. Soil analytical results for metals, OCPs, OPPs, and

herbicides are in Tables 1 through 4, respectively. Soil vapor analytical results for VOCs are summarized in Table 5.

Soil Analytical Results

Various metals were detected in both composite samples (SS-1 and SS-2) at levels that were below applicable screening levels or levels consistent with naturally occurring background conditions. Detected concentrations of metals across the site are highly unlikely to pose a risk to human health or groundwater based on concentrations and the estimated depth to groundwater of approximately 100 feet bgs at the Subject Property. Soil analytical results for metals are in Table 1.

OCPs, OPPs, and herbicides were not detected above laboratory reporting limits or regulatory human health risk screening levels for commercial/industrial land use in either of the two composite surficial soil samples (SS-1 and SS-2). Based on the analysis of collected soil samples, pesticides and herbicides are highly unlikely to pose a risk to human health or groundwater beneath the Subject Property. Soil analytical results for OCPs, OPPs, and herbicides are in Tables 2 through 4, respectively.

Soil Vapor Analytical Results

VOC concentrations reported at soil vapor probes SS-11 through SS-19 were generally below applicable screening levels for protection of human health except for benzene and ethylbenzene, chemicals that may have been used historically in the manufacturing of resins and epoxies. Concentrations exceeding EPA RSLs or DTSC SLs were generally within an order of magnitude of applicable screening levels as summarized in the following table and shown on Figure 3.

Sample Location	Depth (feet bgs)	Benzene[a] (µg/m³)	Ethylbenzene (µg/m³)
Health Risk Screening Level (C/I Soil Vapor)[b]		***14***	***163***
SS-11	5	**18**[c]	24
SS-12	5	**93**	44
SS-13	5	**128**	57
SS-14	5	**138**	**209**
SS-15	5	ND<32	**309**
SS-16	5	**35**	52
SS-18	5	**15**	10

(a) Concentrations reported in micrograms per meters cubed (µg/m³)
(b) Screening levels for sub-slab or soil vapor at commercial/industrial properties calculated by dividing screening levels for indoor air by a recommended attenuation factor of 0.03.
(c) Values with **bold font** indicate a detection greater than or equal to the attenuated EPA RSL or DTSC SL for commercial/industrial land use.

Benzene was detected at concentrations greater than applicable screening levels at six soil vapor probe locations and was highest in the center of the Subject Property near the Dura Technologies building at vapor probe SS-14 (Figure 3). The maximum benzene concentration (138 µg/m^3 at vapor probe SS-14) was an order of magnitude greater than the human health risk screening level. Ethylbenzene was detected above screening levels at vapor probes SS-14 and SS-15 located in the center of the Subject Property along the west side of the Dura Technologies building (Figure 3). The highest concentrations of benzene and ethylbenzene were centered around the Dura Technologies building where chemicals are stored and mixed (Figure 3).

Soil vapor samples were analyzed for 1,1-DFA to assess potential surface seal leaks. Concentrations of 1,1-DFA were below laboratory detection limits at all vapor probes. DTSC states that ambient air leaks up to 5 percent are acceptable based on quantification of the leak detector compound (DTSC, 2015). The leak check results confirm the integrity of the sampling train and indicate that soil vapor samples are representative of subsurface conditions.

Summary, Conclusions, and Recommendations

Orion performed a Phase II ESA at the Subject Property located at 2720 South Willow Avenue in Rialto, California. The Phase II was conducted in response to RECs and VECs identified in a previous Phase I ESA from April 2022. The objective of the Phase II ESA was to assess potential impacts to shallow soil and soil vapor that may have resulted from historical onsite operations. The Phase II ESA included the collection of 19 soil samples and 9 soil vapor samples at the Subject Property. The results of the Phase II ESA support the following observations and/or conclusions:

1. Metal, OCP, OPP, and herbicide concentrations in shallow soil were below background or regulatory screening levels (DTSL SLs or EPA RSLs) for human health risks associated with direct contact under commercial/industrial land and not a likely risk for groundwater.

2. Soil vapor sampling results indicated that VOCs, except benzene and ethylbenzene, were below commercial/industrial screening levels for human health risks associated with vapor intrusion to indoor air.

3. Benzene and ethylbenzene soil vapor sampling results were above commercial/industrial screening levels for human health risks in samples surrounding the Dura Technologies building. Orion was not able to sample below the Dura Technologies building, where chemicals are used and stored during site operations.

Based on the results of the Phase II ESA, historical activities at the Subject Property may have released hazardous materials and impacted the site above screening levels that are protective of human health and the environment. Orion recommends (1) indoor air sampling to confirm current building occupants are protected from vapor intrusion, (2) additional sampling below the Dura Technologies building, when accessible, and (3) a vapor barrier and collection system be installed under future buildings to protect the health of future building occupants from vapor intrusion.

Environmental Professional Statement

Orion declares that, to the best of our professional knowledge and belief, we meet the definition of "environmental professional" as defined in Part 312.10 of Title 40 of the Code of Federal Regulations (40 CFR). Orion personnel have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

We appreciate the opportunity to provide environmental services to Scannell. If you have questions or comments regarding this report, please contact Mike Purchase at (562) 988-2855 or at mpurchase@orionenv.com.

Very truly yours,

ORION ENVIRONMENTAL INC.

Michael P. Purchase, P.E.
Vice President

Attachments: Table 1 – Soil Analytical Results – Metals
Table 2 – Soil Analytical Results – Organochlorine Pesticides
Table 3 – Soil Analytical Results – Organophosphorus Pesticides
Table 4 – Soil Analytical Results – Chlorinated Herbicides
Table 3 – Soil Vapor Analytical Results – VOCs

Figure 1 – Subject Property Location Plan
Figure 2 – Phase II Sampling Locations
Figure 3 – Soil Vapor Analytical Results

Attachment A – Reliance and Limitations
Attachment B – General Quality Assurance/Quality Control Procedures
Attachment C – Laboratory Analytical Reports and Chain-of-Custody Forms

References

AECOM, 2022. "2021 Fourth Quarter Groundwater Monitoring Report, Tesoro Colton Terminal – Former ARCO Facility No. 19T, 2359 South Riverside Avenue, Rialto, California." 31 January.

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TABLE 1

SOIL ANALYTICAL RESULTS - METALS
2720 SOUTH WILLOW ROAD
RIALTO, CALIFORNIA
SCANNELL PROPERTIES

Sample Location	Sample Date	Metals (mg/kg)[a]																
		Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Mercury	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc
Health Risk Screening Levels (C/I Soil) [b]		***470***	***0.36***	***220,000***	***230***	***780***	***NE*** [c]	***350***	***47,000***	***320***	***4.4***	***5,800***	***11,000***	***5,800***	***5,800***	***12***	***5,800***	***350,000***
EPA RSL (Soil to Groundwater) [d]		***0.27***	***0.0015***	***82***	***3.2***	***0.38***	***180,000***	***0.27***	***28***	***14***	***0.033***	***2.0***	***26***	***0.26***	***0.80***	***0.014***	***86***	***373***
Background [e]		***0.60***	***12***	***509***	***1.3***	***0.36***	***122***	***15***	***29***	***24***	***0.26***	***1.3***	***57***	***0.058***	***0.80***	***0.56***	***112***	***149***
SS-1	4/12/22	ND<2[f]	4.6	58	ND<1	ND<1	17	7.7	14	13	ND<0.1	ND<1	13	ND<2	ND<1	ND<2	32	53
SS-2	4/12/22	ND<2	5.0	62	ND<1	ND<1	20	8.7	16	15	ND<0.1	ND<1	15	ND<2	ND<1	ND<2	36	62

(a) Metals analyzed using Environmental Protection Agency (EPA) Method 6010B and reported in milligrams per kilogram (mg/kg). Mercury analyzed using EPA Method 7471A and reported in mg/kg.
Bold values indicate a detection greater than or equal to both the typical background concentration and the EPA Regional Screening Level (RSL) for leaching to groundwater. Highlighted and bolded values indicate a detection greater than or equal to both the typical background concentration and the EPA RSL or California Department of Toxic Substances Control (DTSC) Modified Screening Level (SL) for human health risks for commercial/industrial land use (C/I Soil).

(b) EPA or DTSC SL for C/I Soil. Lowest RSL or SL displayed based on cancer or non-cancer hazards and exposure pathways (ingestion, dermal contact, or inhalation).

(c) Not established (NE).

(d) EPA RSL for soil leaching to groundwater. Lowest RSL displayed for risk-based or Maximum Contaminant Level-based protection of groundwater.

(e) Background Concentrations of Trace and Major Elements in California Soils, Kearney Foundation of Soil Science, Division of Agriculture and Natural Resources, University of California, March 1996. Arsenic background level from: Determination of a Southern California Regional Background Arsenic Concentration in Soil, California Department of Toxic Substances Control, January 2008.

(f) Not detected above laboratory reporting limit listed (ND).

TABLE 2

SOIL ANALYTICAL RESULTS - ORGANOCHLORINE PESTICIDES
2720 SOUTH WILLOW ROAD
RIALTO, CALIFORNIA
SCANNELL PROPERTIES

Sample Location	Sample Date	Organochlorine Pesticides[a] (mg/kg)																				
		Aldrin	alpha-BHC (alpha-HCH)	beta-BHC (beta-HCH)	delta-BHC (delta-HCH)	gamma-BHC (gamma-HCH or Lindane)	alpha-Chlordane	gamma-Chlordane	Technical Chlordane	Dieldrin	4,4'-DDD	4,4'-DDE	4,4'-DDT	Endrin	Endosulfan Sulfate	Endrin Aldehyde	Endrin Ketone	Endosulfan I	Endosulfan II	Heptachlor	Heptachlor Epoxide	Methoxy-chlor	Toxaphene
Health Risk Screening Levels (C/I Soil)[b]		***0.18***	***0.24***	***0.82***	***NE[c]***	***2.00***	***500***	***500***	***6.1***	***0.093***	***6.2***	***9.3***	***7.1***	***160***	***3,200***	***NE***	***NE***	***6,000[d]***		***0.63***	***0.33***	***2,600***	***1.2***
EPA RSL (Soil to Groundwater)[e]		***0.00015***	***0.000042***	***0.00015***	***NE***	***0.00024***	***0.49***	***1.4***	***0.0027***	***0.000071***	***0.0075***	***0.011***	***0.077***	***0.081***	***2.1***	***NE***	***NE***	***1.4[e]***		***0.00012***	***0.000028***	***2.0***	***0.011***
SS-1	4/12/22	ND<0.004[f]	ND<0.004	ND<0.004	ND<0.004	ND<0.004	ND<0.004	ND<0.004	ND<0.02	ND<0.004	ND<0.004	ND<0.008	ND<0.008	ND<0.004	ND<0.004	ND<0.004	ND<0.01	ND<0.008	ND<0.004	ND<0.004	ND<0.004	ND<0.01	ND<0.06
SS-2	4/12/22	ND<0.004	ND<0.004	ND<0.004	ND<0.004	ND<0.004	ND<0.004	ND<0.004	ND<0.02	ND<0.004	ND<0.004	ND<0.008	ND<0.008	ND<0.004	ND<0.004	ND<0.004	ND<0.01	ND<0.008	ND<0.004	ND<0.004	ND<0.004	ND<0.01	ND<0.06

(a) Organochlorine pesticides analyzed by U.S. Environmental Protection Agency (EPA) Method 8081 with the exception of DDT total which is a calculated value; reported in milligrams per kilogram (mg/kg) including:
alpha-BHC = alpha-hexachlorocyclohexane beta-BHC = beta-hexachlorocyclohexane delta-BHC = delta-hexachlorocyclohexane gamma-BHC = gamma-hexachlorocyclohexane
4,4'-DDD = dichlorodiphenyldichloroethane 4,4'-DDE = dichlorodiphenyldichloroethylene 4,4'-DDT = dichlorodiphenyltrichloroethane

Bold values indicate a detection greater than or equal to the EPA Regional Screening Level (RSL) for leaching to groundwater. Highlighted and bolded values indicate a detection greater than or equal to the EPA RSL or California Department of Toxic Substances Control (DTSC) Modified Screening Level (SL) for human health risks for commercial/industrial land use (C/I Soil).

(b) EPA RSL or DTSC SL for C/I Soil. Lowest RSL or SL displayed based on cancer or non-cancer hazards and exposure pathways (ingestion, dermal contact, or inhalation).

(c) Not established (NE).

(d) RSL and SL established for total Endosulfan.

(e) EPA RSL for soil leaching to groundwater. Lowest RSL displayed for risk-based or Maximum Contaminant Level-based protection of groundwater.

(f) Not detected above the reporting limit listed (ND).

TABLE 3

SOIL ANALYTICAL RESULTS - ORGANOPHOSPHORUS PESTICIDES
2720 SOUTH WILLOW ROAD
RIALTO, CALIFORNIA
SCANNELL PROPERTIES

Sample Location	Sample Date	Organophosphorus Pesticides[a] (mg/kg)																			
		Bolstar (Sulprofos)	Chlorpyrifos	Coumaphos	Demeton-O	Demeton-S	Diazinon	Dichlorvos	Disulfoton	Ethoprop	Fensulfothion	Fenthion	Methyl Azinphos (Guthion)	Methyl Parathion	Merphos	Mevinphos	Naled	Phorate	Ronnel	Tokuthion (Prothiofos)	Tetrachlorvinphos (Stirophos)	Trichloronate
Health Risk Screening Levels (C/I Soil)[b]		***NE[c]***	***530***	***NE***	***NE***	***NE***	***370***	***5.1***	***21***	***NE***	***NE***	***NE***	***1,600***	***130***	***34***	***NE***	***1,100***	***110***	***51,000***	***NE***	***62***	***NE***
EPA RSL (Soil to Groundwater)[d]		***NE***	***0.13***	***NE***	***NE***	***NE***	***0.065***	***0.000081***	***0.00094***	***NE***	***NE***	***NE***	***0.017***	***0.0074***	***0.059***	***NE***	***0.018***	***0.0034***	***3.7***	***NE***	***0.0082***	***NE***
SS-1	4/12/22	ND<0.05[e]	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.1	ND<0.1	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05
SS-2	4/12/22	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.1	ND<0.1	ND<0.05	ND<0.05	ND<0.05	ND<0.05	ND<0.05

(a) Organophosphorus pesticides analyzed by U.S. Environmental Protection Agency (EPA) Method 8141; reported in milligrams per kilogram (mg/kg) including:
Bold values indicate a detection greater than or equal to the EPA Regional Screening Level (RSL) for leaching to groundwater. Highlighted and bolded values indicate a detection greater than or equal to the EPA RSL or California Department of Toxic Substances Control (DTSC) Modified Screening Level (SL) for human health risks for commercial/industrial land use (C/I Soil).
(b) EPA or DTSC SL for C/I Soil. Lowest RSL or SL displayed based on cancer or non-cancer hazards and exposure pathways (ingestion, dermal contact, or inhalation).
(c) Not established (NE).
(d) EPA RSL for soil leaching to groundwater. Lowest RSL displayed for risk-based or Maximum Contaminant Level-based protection of groundwater.
(e) Not detected above the reporting limit listed (ND).

TABLE 4

SOIL ANALYTICAL RESULTS - CHLORINATED HERBICIDES
2720 SOUTH WILLOW ROAD
RIALTO, CALIFORNIA
SCANNELL PROPERTIES

Sample Location	Sample Date	Chlorinated Herbicides[a] (mg/kg)									
		2,4-D	2,4,5-TP (Silvex or Fenoprop)	2,4,5-T	Dicamba	Dinoseb (DNBP)	Dalapon	Dichloroprop	2,4-DB	MCPP (Mecoprop)	MCPA
Health Risk Screening Levels (C/I Soil) [b]		***7,300***	***4,200***	***5,300***	***16,000***	***530***	***16,000***	***NE*** [c]	***16,000***	***530***	***260***
EPA RSL (Soil to Groundwater) [d]		***0.018***	***0.028***	***0.068***	***0.15***	***0.062***	***0.041***	***NE***	***0.42***	***0.0047***	***0.0020***
SS-1	4/12/22	ND<0.2[e]	ND<0.02	ND<0.02	ND<0.02	ND<0.1	ND<0.5	ND<0.2	ND<0.2	ND<20	ND<20
SS-2	4/12/22	ND<0.2	ND<0.02	ND<0.02	ND<0.02	ND<0.1	ND<0.5	ND<0.2	ND<0.2	ND<20	ND<20

(a) Chlorinated herbicides analyzed by U.S. Environmental Protection Agency (EPA) Method 8151A; reported in milligrams per kilogram (mg/kg) including:
2,4-D = 2,4-dichlorophenoxyacetic acid; 2,4,5-TP = 2-(2,4,5-trichlorophenoxy) propionic acid; 2,4,5-T = 2,4,5-trichlorophenoxyacetic acid
2,4-DB = 4-(2,4-dichlorophenoxy) butyric acid; MCPP - methylchlorophenoxypropionic acid; MCPA = 2-methyl-4-chlorophenoxyacetic acid
Bold values indicate a detection greater than or equal to the EPA Regional Screening Level (RSL) for leaching to groundwater. Highlighted and bolded values indicate a detection greater than or equal to the EPA RSL or California Department of Toxic Substances Control (DTSC) Modified Screening Level (SL) for human health risks for commercial/industrial land use (C/I Soil).
(b) EPA RSL os DTSC SL for C/I Soil. Lowest RSL or SL displayed based on cancer or non-cancer hazards and exposure pathways (ingestion, dermal contact, or inhalation).
(c) Not established (NE).
(d) EPA RSL for soil leaching to groundwater. Lowest RSL displayed for risk-based or Maximum Contaminant Level-based protection of groundwater.
(e) Not detected (ND) at the reporting limit listed.

TABLE 5

SOIL VAPOR ANALYTICAL RESULTS - VOCs
2720 SOUTH WILLOW ROAD
RIALTO, CALIFORNIA
SCANNELL PROPERTIES

Sample Location	Sample Date	Volatile Organic Compounds[a] (µg/m^3)									
		Acetone	Benzene	2-Butanone	Ethyl-benzene	4-Ethyl-toluene	4-Methyl-2-pentanone	Styrene	Toluene	m,p-Xylenes[b]	o-Xylene
Health Risk Screening Levels (C/I Sub-Slab/Soil Vapor)[c]		***4,666,667***	***14***	***733,333***	***163***	***NE[d]***	***433,333***	***130,000***	***43,333***	***14,667***	***14,667***
SS-11	4/13/22	231	**18**	62	24	ND<8.9[e]	ND<7.4	124	238	78	23
SS-12	4/13/22	191	**93**	115	44	10	70	158	567	126	35
SS-13	4/13/22	74	**128**	35	57	11	ND<8.2	47	907	179	44
SS-14	4/13/22	102	**138**	ND<56	**209**	ND<94	ND<78	ND<81	7,557	610	135
SS-15	4/13/22	186	ND<32	ND<30	**309**	ND<49	ND<41	73	4,534	1,176	283
SS-16	4/13/22	81	**35**	44	52	ND<9.4	45	20	1,323	152	35
SS-17	4/13/22	40	ND<6.1	ND<5.6	ND<8.3	ND<9.4	ND<7.8	11	ND<7.2	ND<8.3	ND<8.3
SS-18	4/13/22	29	**15**	ND<5.6	10	ND<9.4	ND<7.8	ND<8.1	166	36	9.6
SS-19	4/13/22	24	ND<6.7	7.4	ND<9.1	ND<10	ND<8.6	ND<9	35	ND<9.1	ND<9.1

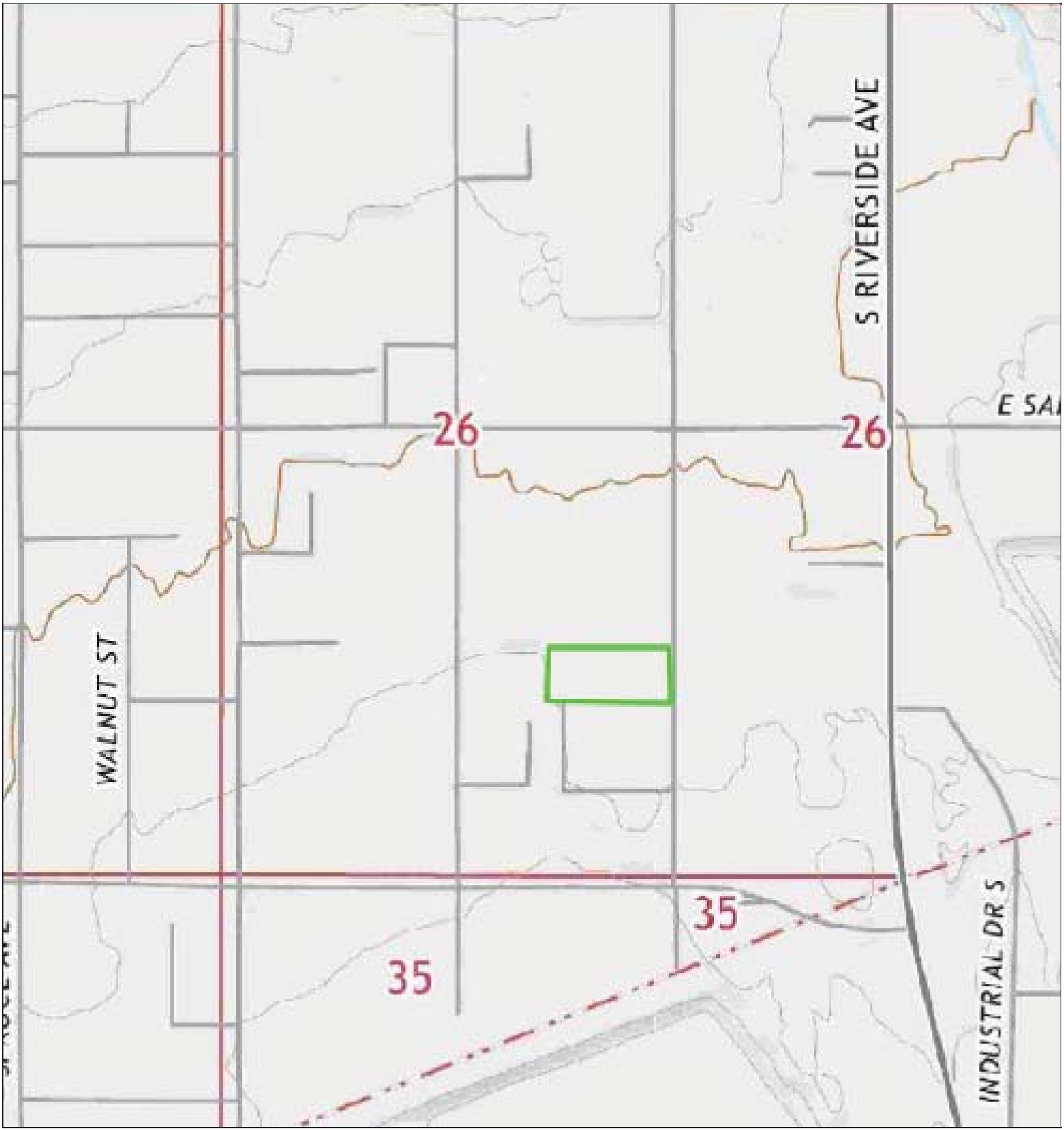
(a) Volatile organic compounds (VOCs) analyzed by U.S. Environmental Protection Agency (EPA) Method TO-15. Reported data converted from parts per billion by volume to micrograms per meter cubed (µg/m^3) using lab-reported sample temperature of 24 degrees Celcius. Highlighted and bolded values indicate a detection greater than or equal to the EPA Regional Screening Level (RSL) or California Department of Toxic Substances Control (DTSC) Modified Screening Level (SL) for human health and vapor intrusion risks for commercial/industrial sub-slab soil vapors (C/I Sub-Slab/Soil Vapor).

(b) Minimum screening level for m-xylene or p-xylene used for m,p-xylenes.

(c) EPA Regional Screening Level (RSL) for commercial/industrial land use or California Department of Toxic Substances Control (DTSC)-Modified Screening Level (SL) for C/I Sub-Slab/Soil Vapor. RSL and SL for sub-slab or soil vapor calculated by dividing RSL or SL for indoor air by a recommended attenuation factor of 0.03. Lowest RSL or SL displayed based on cancer or non-cancer hazards.

(d) Not established (NE).

(e) Not detected above the reporting limit listed (ND).



N

Source/Year : USGS, 2021

Scale: 1" = 18,000'

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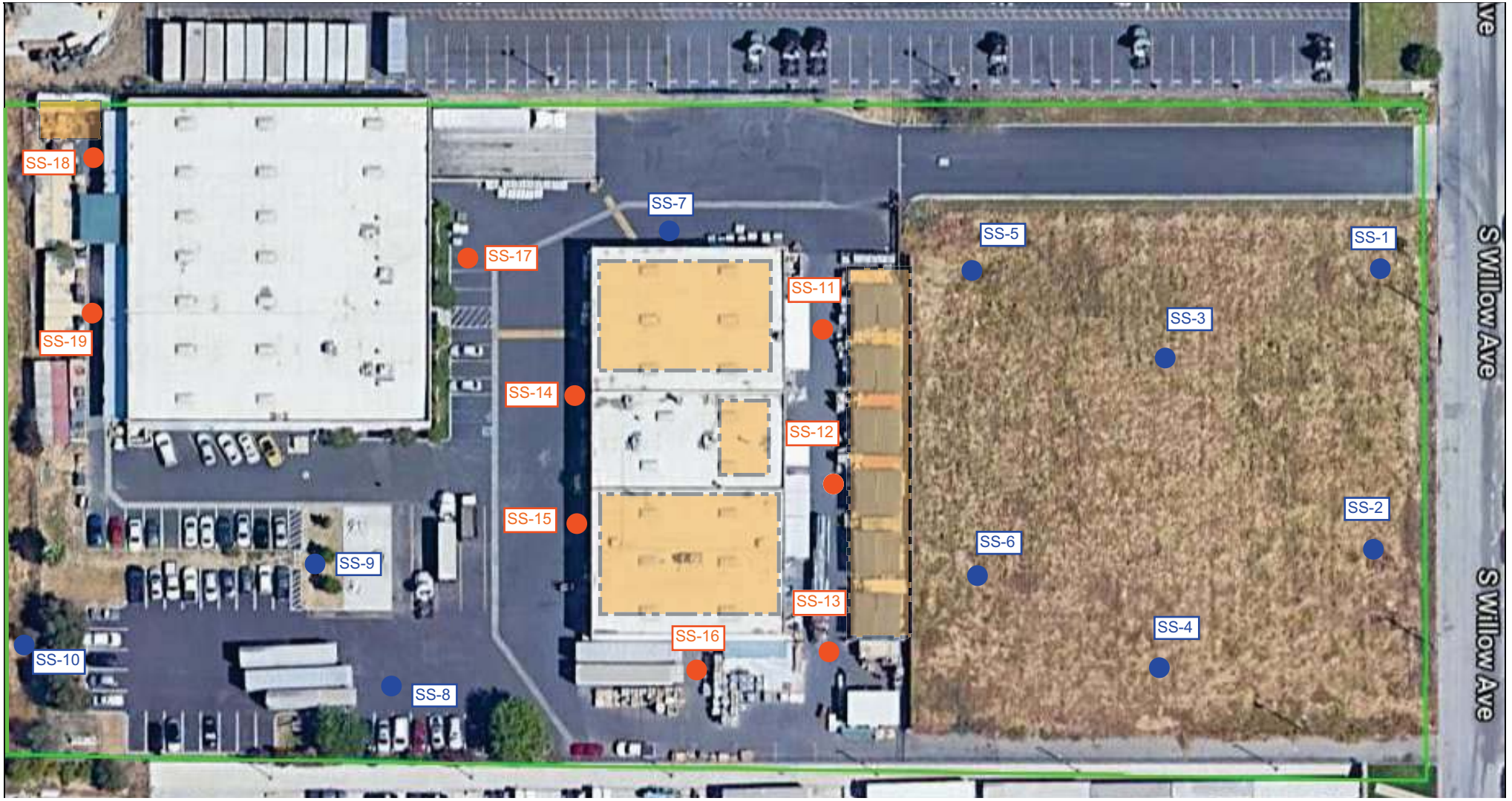
Subject Property Location Map

2720 South Willow Avenue, Rialto, CA

11 May 2022

Project 84WRR

Figure 1



Chemical Storage or Mixing Area

Property Boundary - Large Scale Orchards from the 1930's to 1990's

Soil Vapor Sample (5 feet bgs) and Surficial Soil Sample (0 to 2 feet bgs) for Soil Composite Samples

Surficial Soil Sample (0 to 2 feet bgs) for Soil Composite Samples

Scale 1" = 1,000'

ORION

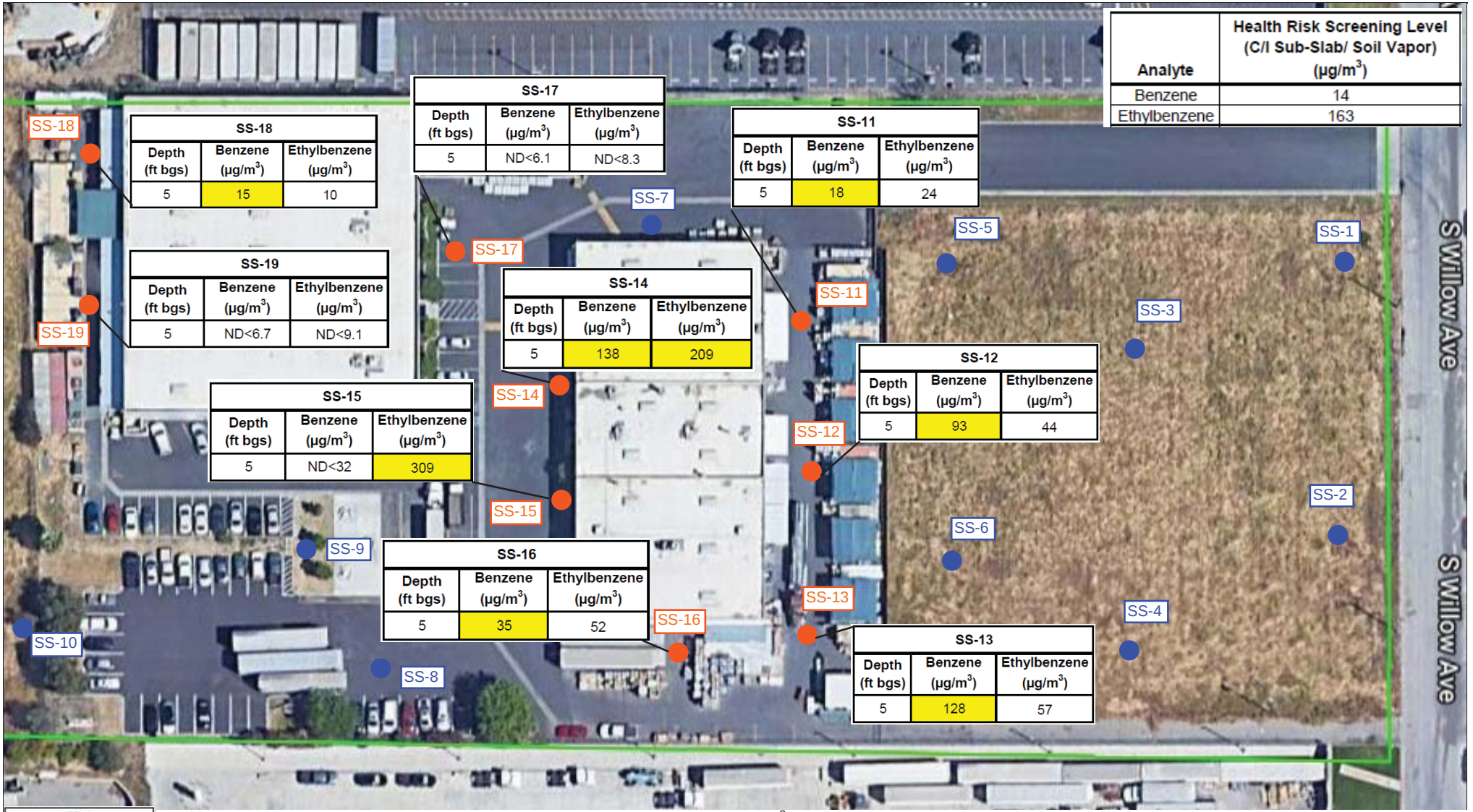
Phase II Sampling Locations

2720 South Willow Avenue, Rialto, California

11 May 2022

Project 84WRR

Figure 2



Analyte	Health Risk Screening Level (C/I Sub-Slab/ Soil Vapor) ($\mu g/m^3$)
Benzene	14
Ethylbenzene	163

SS-18		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	15	10

SS-19		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	ND<6.7	ND<9.1

SS-17		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	ND<6.1	ND<8.3

SS-14		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	138	209

SS-15		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	ND<32	309

SS-16		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	35	52

SS-11		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	18	24

SS-12		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	93	44

SS-13		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	128	57

SS-11		
Depth (ft bgs)	Benzene ($\mu g/m^3$)	Ethylbenzene ($\mu g/m^3$)
5	18	24

Soil vapor sample analytical results for volatile organic compounds (VOCs); reported in micrograms per cubic meter ($\mu g/m^3$). Sampling depths reported in feet below ground surface (ft bgs). Highlighted values indicate a detection greater than the California Department of Toxic Substances Control Screening Level (DTSC SL) and/or EPA RSL for human health risks for commercial/industrial (C/I) land use.

Soil Vapor Sample (5 feet bgs) and Surficial Soil Sample (0 to 2 feet bgs) for Soil Composite Samples

Surficial Soil Sample (0 to 2 feet bgs) for Soil Composite Samples

Scale: 1" = 1,000'

ORION

Soil Vapor Analytical Results

2720 South Willow Avenue, Rialto, California

11 May 2022

Project 84WRR

Figure 3

ATTACHMENT A

RELIANCE AND LIMITATIONS

ATTACHMENT A
RELIANCE AND LIMITATIONS

Orion Environmental Inc. (Orion) has prepared this report for the exclusive use of Scannell Properties, LLC, as it pertains to the property at 2720 South Willow Avenue in Rialto, California. Any use of or reliance on this report by a third party shall be at such party's sole risk.

The scope of this Environmental Site Assessment (ESA) was limited to soil sampling at 0 to 2 feet below ground surface and soil vapor sampling at the Subject Property in areas allowed to be sampled by the current property owner. Sampling and analysis were only conducted for the locations and analytes described in previous sections of the Phase II ESA report. Investigations of the following conditions were not part of the scope of work and would not have been revealed by the investigation:

- ☐ Contaminants present below existing buildings at the Subject Property
- ☐ Contaminants in groundwater or non-surficial soil at the Subject Property
- ☐ Naturally occurring toxics
- ☐ Toxicity of substances common in current habitable environments, such as stored household products, building materials, and consumables
- ☐ Biological pathogens
- ☐ A contaminant plume below the ground surface originating from an offsite source
- ☐ Contaminants or contaminant concentrations that do not violate present regulatory standards but that may violate future such standards
- ☐ Unknown Subject Property contamination, such as "midnight dumping" or accidental spillage of waste other than the debris observed and noted in this report.

No warranty or guarantee concerning the findings and conclusions of this ESA is offered or intended. Rather, it is represented that the scope and performance of the professional services rendered are in accordance with the current state of practice being conducted in the Subject Property region by similarly qualified practitioners.

ATTACHMENT B

GENERAL QUALITY ASSURANCE/QUALITY CONTROL PROCEDURES

ATTACHMENT B
GENERAL QUALITY ASSURANCE/QUALITY CONTROL PROCEDURES

The following sections describe quality assurance/quality control (QA/QC) procedures for field activities.

Health and Safety

Orion Environmental Inc. (Orion) used a site-specific health and safety plan (HSP) with procedures that were followed by field personnel for equipment safety, medical surveillance, personal protection, air quality monitoring, exposure control, emergency response, and general work practices during field activities. Before beginning work at the site, a site safety meeting was conducted. Field personnel reviewed the HSP and signed the accompanying acknowledgment form before initiating field activities. Field personnel were required to comply with the HSP throughout performance of site assessment activities. Based on the site history and potential chemicals of concern, field activities were initiated in Level D personal protective equipment (PPE).

Personal Decontamination Procedures

At a minimum, field personnel followed the following decontamination procedures:

1. Wore appropriate gloves.
2. Washed hands thoroughly with soap and water.
3. Avoided unnecessary contact with potentially hazardous materials.

The HSP was reviewed for site-specific personal decontamination procedures.

Documentation Procedures

Field personnel followed documentation procedures developed for site investigation work. The procedures served to (1) provide a record of the activities performed in the field and (2) permit identification of samples and tracking of their status in the field, during shipment, and at the laboratory. All documentation was recorded with waterproof ink.

Soil Sampling

Composited soil samples were collected using hand auger or direct-push cuttings from a depth of approximately 0 to 2 feet below ground surface at each location. At each location (19 total locations), a sample was collected and split into separate containers for composited sample analysis following standard incremental sampling methodology. A total of two duplicate samples were analyzed for the site.

Soil samples were collected for laboratory analysis using containers provided by the analytical laboratory, including glass jars. The sample containers were labeled or marked

and placed in a resealable plastic bag on ice in a cooler until delivery to the analytical laboratory. A permanent pen was used to complete the label or mark directly on the tube. The information recorded included project identification, sample number (including boring number and sample depth), date, time, and the initials of the person preparing the samples. Standard chain-of-custody procedures were used during sample collection and delivery. Soil sampling locations were backfilled to the ground surface with native soil.

Soil Vapor Probe Materials and Construction

Soil vapor sampling activities were generally conducted in accordance with the April 2015 Advisory – Active Soil Gas Investigations developed by the California Department of Toxic Substances Control (DTSC) and Regional Water Quality Control Board (RWQCB; DTSC/RWQCB, 2015).

The borings for the vapor monitoring points were advanced by direct-push as described in the above section. After reaching the desired sampling depth, a monitoring point was constructed using 1/4 inch outside diameter Teflon tubing with an airstone filter. The filter was less than 6 inches in length.

The filter was lifted up approximately 6 inches and sand was poured down the hole to encase the filter in 1 foot of sand pack. Approximately 1 foot of dry granular bentonite was placed on top of the sand pack and the boring was backfilled to approximately 1 foot below ground surface with bentonite grout. After sample collection, the temporary soil vapor probes were decommissioned by manually removing the tubing. Borings were completed at the surface with either concreter or native soil to match existing conditions.

Soil Vapor Sampling Method

The vapor samples were collected from monitoring points approximately 24 hours after installation. At each sample location, new Nylaflow or Teflon tubing was connected to the top of the probe and to an aboveground sampling system using a three-way valve.

To ensure sample integrity, a shut-in test and leak test was conducted as described below. Once the shut-in test had been performed and the leak compound was in-place, a three-way valve was 1-liter soil vapor sample was collected for analysis in a Tedlar® bag following purging. A purge volume of three purge volumes was used for all sample locations during the sampling event. As per DTSC/RWQCB requirements, flow rate not exceeding 200 milliliters per minute and vacuum less than 100 inches of water column (in. wc) was maintained during purging and sampling. Purging was conducted using a low-flow pump.

Shut-In Test

Prior to purging or sampling, a shut-in test was conducted at each sampling point to check for leaks in the aboveground sampling system. The aboveground valves, lines, and fittings downstream of the top of the probe were assembled with the sample container attached and its valve in the closed position. A minimum vacuum of 10 in. mercury was applied to the

system using a purge pump. A vacuum gauge connected to the system was observed for at least 1 minute. If there was any observable loss of vacuum, the fittings were readjusted until the vacuum in the sample train did noticeably dissipate. After the shut-in test was completed, the sampling train was not altered.

Leak Test

Leak tests were conducted at each soil vapor sampling point to monitor for potential leaks during soil vapor sampling that could dilute samples with ambient air and produce results that underestimate actual site concentrations or contaminate the sample with external contaminants. A leak check compound (1,1-difluoroethane) was applied at each sample location including (1) surface bentonite seals, and (2) the top of temporary soil vapor monitoring points.

Chain-of-Custody Records

Chain-of-custody records for soil vapor samples were completed at the end of each day. One copy of these records was placed in the project file.

Solid Waste Storage and Disposal

Solid wastes such as used PPE, paper towels, trash bags, and any other solid debris were collected for disposal. Soil generated during vapor probe installation and sampling activities were segregated and placed in drums approved by the U.S. Department of Transportation. The drums were labeled and stored onsite until disposal. Soil will be profiled and managed as investigation-derived waste (IDW) in accordance with California and Federal guidelines.

Chain-of-Custody Records

During sample collection, chain-of-custody records were completed before samples were packaged for shipment. One copy of these records was placed in the project file. A second copy accompanied samples during transportation to the laboratory. The individual in the analytical laboratory who accepted responsibility for samples signed and dated the chain-of-custody record.

Analytical QA/QC Procedures

Laboratory analytical QA/QC procedures included (1) preparing and analyzing laboratory samples to assess the performance of the analytical laboratory and (2) conducting data validation in accordance with the protocols described below. QC samples prepared by the

laboratory included method blanks, matrix spike and matrix spike duplicates, and laboratory control samples.

The laboratory results were reviewed in general accordance with U.S. Environmental Protection Agency (EPA) guidelines for data validation. The data validation process included reviewing laboratory results for the following parameters:

- Completeness of the data package
- Compliance with EPA-required holding times
- Agreement of dilution factors with reported detection limits
- Percent recovery and relative percent difference results for matrix spike and matrix spike duplicate analyses
- Percent recovery results for laboratory control samples.

ATTACHMENT C

LABORATORY ANALYTICAL REPORTS AND CHAIN-OF-CUSTODY FORMS

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

April 19, 2022

Adair Johnson
Orion Environmental, Inc.
2955 Redondo Beach Ave.
Long Beach, CA 90806

Report No.: 2204151
Project Name: 84WRR

Dear Adair Johnson,

This report contains the analytical results for the sample(s) received under chain of custody(s) by Positive Lab Service on April 14, 2022.

The test results in this report are performed in compliance with ELAP accreditation requirements for the certified parameters. The laboratory report may not be produced, except in full, without the written approval of the laboratory.

The issuance of the final Certificate of Analysis takes precedence over any previous Preliminary Report. Preliminary data should not be used for regulatory purposes. Authorized signature(s) is provided on final report only.

If you have any questions in reference to this report, please contact your Positive Lab Service coordinator.

Project Manager

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

Orion Environmental, Inc.
2955 Redondo Beach Ave.
Long Beach, CA 90806

Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204151

Project: 84WRR

Sample ID: SS-1 Soil (2204151-01) Sampled: 04/12/22 13:00 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method		Prepared	Analyzed	By	Batch
Aldrin	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
alpha-BHC	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
beta-BHC	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
delta-BHC	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
gamma-BHC (Lindane)	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
alpha-Chlordane	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
gamma-Chlordane	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
4,4´-DDD	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
4,4´-DDE	ND		1	ug/kg	8.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
4,4´-DDT	ND		1	ug/kg	8.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Dieldrin	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endosulfan I	ND		1	ug/kg	8.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endosulfan II	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endosulfan sulfate	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endrin	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Technical Chlordane	ND		1	ug/kg	20.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endrin aldehyde	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endrin ketone	ND		1	ug/kg	10.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Heptachlor	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Heptachlor epoxide	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Methoxychlor	ND		1	ug/kg	10.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Toxaphene	ND		1	ug/kg	60.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Surrogate: 2,4,5,6 Tetrachloro-m-xyler.	*65.1 %*			*44-115*		*EPA 3550C*	*EPA 8081A*	*04/15/22*	*04/19/22*	*ai*	*BD21919*
Surrogate: Decachlorobiphenyl	*59.0 %*			*40-148*		*EPA 3550C*	*EPA 8081A*	*04/15/22*	*04/19/22*	*ai*	*BD21919*

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method		Prepared	Analyzed	By	Batch
Antimony	ND		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Arsenic	**4.60**		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Barium	**57.8**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Beryllium	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Cadmium	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Chromium	**17.2**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Cobalt	**7.65**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Copper	**14.4**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Lead	**12.5**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Molybdenum	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Nickel	**12.5**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Selenium	ND		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Silver	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Thallium	ND		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Vanadium	**32.3**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Zinc	**52.8**		1	mg/kg	5.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method		Prepared	Analyzed	By	Batch
Mercury	ND		1	mg/kg	0.100	EPA 7471A	EPA 7471A	04/14/22	04/15/22	dd	BD21831

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method		Prepared	Analyzed	By	Batch
EPA 8141A Organo Pesticides	See Attachment										

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

Orion Environmental, Inc.
2955 Redondo Beach Ave.
Long Beach, CA 90806

Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204151

Project: 84WRR

Sample ID: SS-1 Soil (2204151-01) Sampled: 04/12/22 13:00 Received: 04/14/22

EPA 8151A Herbicides	See Attachment										

Sample ID: SS-2 Soil (2204151-02) Sampled: 04/12/22 13:05 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method		Prepared	Analyzed	By	Batch
Aldrin	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
alpha-BHC	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
beta-BHC	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
delta-BHC	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
gamma-BHC (Lindane)	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
alpha-Chlordane	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
gamma-Chlordane	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
4,4´-DDD	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
4,4´-DDE	ND		1	ug/kg	8.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
4,4´-DDT	ND		1	ug/kg	8.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Dieldrin	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endosulfan I	ND		1	ug/kg	8.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endosulfan II	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endosulfan sulfate	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endrin	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Technical Chlordane	ND		1	ug/kg	20.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endrin aldehyde	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Endrin ketone	ND		1	ug/kg	10.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Heptachlor	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Heptachlor epoxide	ND		1	ug/kg	4.00	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Methoxychlor	ND		1	ug/kg	10.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Toxaphene	ND		1	ug/kg	60.0	EPA 3550C	EPA 8081A	04/15/22	04/19/22	ai	BD21919
Surrogate: 2,4,5,6 Tetrachloro-m-xyler.	*53.8 %*			*44-115*		*EPA 3550C*	*EPA 8081A*	*04/15/22*	*04/19/22*	*ai*	*BD21919*
Surrogate: Decachlorobiphenyl	*67.3 %*			*40-148*		*EPA 3550C*	*EPA 8081A*	*04/15/22*	*04/19/22*	*ai*	*BD21919*

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method		Prepared	Analyzed	By	Batch
Antimony	ND		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Arsenic	**5.00**		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Barium	**62.4**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Beryllium	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Cadmium	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Chromium	**19.7**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Cobalt	**8.66**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Copper	**16.1**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Lead	**14.9**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Molybdenum	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Nickel	**14.6**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Selenium	ND		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Silver	ND		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Thallium	ND		1	mg/kg	2.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Vanadium	**36.2**		1	mg/kg	1.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833
Zinc	**62.1**		1	mg/kg	5.00	EPA 3050B	EPA 6010B	04/14/22	04/15/22	DD	BD21833

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method		Prepared	Analyzed	By	Batch
Mercury	ND		1	mg/kg	0.100	EPA 7471A	EPA 7471A	04/14/22	04/15/22	dd	BD21831

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch

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Certificate of Analysis

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204151

Orion Environmental, Inc.
2955 Redondo Beach Ave.
Long Beach, CA 90806

Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759

Project: 84WRR

Sample ID: SS-2 Soil (2204151-02) Sampled: 04/12/22 13:05 Received: 04/14/22

EPA 8141A Organo Pesticides	See Attachment
EPA 8151A Herbicides	See Attachment

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Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204151

Project: 84WRR

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BD21919 - EPA 3550C										
Blank	**Prepared: 04/15/22 Analyzed: 04/18/22**									
Aldrin	ND	2.00	ug/kg							
alpha-BHC	ND	2.00	ug/kg							
beta-BHC	ND	2.00	ug/kg							
delta-BHC	ND	2.00	ug/kg							
gamma-BHC (Lindane)	ND	2.00	ug/kg							
alpha-Chlordane	ND	2.00	ug/kg							
gamma-Chlordane	ND	2.00	ug/kg							
4,4'-DDD	ND	2.00	ug/kg							
4,4'-DDE	ND	4.00	ug/kg							
4,4'-DDT	ND	4.00	ug/kg							
Dieldrin	ND	2.00	ug/kg							
Endosulfan I	ND	4.00	ug/kg							
Endosulfan II	ND	2.00	ug/kg							
Endosulfan sulfate	ND	2.00	ug/kg							
Endrin	ND	2.00	ug/kg							
Technical Chlordane	ND	10.0	ug/kg							
Endrin aldehyde	ND	2.00	ug/kg							
Endrin ketone	ND	5.00	ug/kg							
Heptachlor	ND	2.00	ug/kg							
Heptachlor epoxide	ND	2.00	ug/kg							
Methoxychlor	ND	5.00	ug/kg							
Toxaphene	ND	30.0	ug/kg							
Surrogate: 2,4,5,6 Tetrachloro-m-xylene	*10.1*		ug/kg	*12.50*		*80.8*	*44-115*			
Surrogate: Decachlorobiphenyl	*10.3*		ug/kg	*12.50*		*82.1*	*40-148*			
LCS	**Prepared: 04/15/22 Analyzed: 04/18/22**									
Aldrin	10.3	2.00	ug/kg	10.00		103	49-150			
gamma-BHC (Lindane)	9.08	2.00	ug/kg	10.00		90.8	42-148			
4,4'-DDT	6.80	4.00	ug/kg	10.00		68.0	55-142			
Dieldrin	9.14	2.00	ug/kg	10.00		91.4	55-137			
Endrin	8.79	2.00	ug/kg	10.00		87.9	47-155			
Heptachlor	9.46	2.00	ug/kg	10.00		94.6	50-171			
Surrogate: 2,4,5,6 Tetrachloro-m-xylene	*10.3*		ug/kg	*12.50*		*82.7*	*54-115*			
Surrogate: Decachlorobiphenyl	*10.5*		ug/kg	*12.50*		*84.3*	*54-133*			
Matrix Spike Source: 2204152-03	**Prepared: 04/15/22 Analyzed: 04/18/22**									
Aldrin	10.3	2.00	ug/kg	12.50	ND	82.4	31-119			
gamma-BHC (Lindane)	7.16	2.00	ug/kg	12.50	ND	57.3	26-115			
4,4'-DDT	10.1	4.00	ug/kg	25.00	ND	40.3	7-151			
Dieldrin	17.2	2.00	ug/kg	25.00	ND	69.0	30-141			
Endrin	15.1	2.00	ug/kg	25.00	ND	60.6	25-161			

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Certificate of Analysis

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2955 Redondo Beach Ave.
Long Beach, CA 90806

Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204151

Project: 84WRR

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BD21919 - EPA 3550C										
Heptachlor	7.84	2.00	ug/kg	12.50	ND	62.7	28-163			
Surrogate: 2,4,5,6 Tetrachloro-m-xylene	*7.90*		ug/kg	*12.50*		*63.2*	*40-117*			
Surrogate: Decachlorobiphenyl	*6.72*		ug/kg	*12.50*		*53.8*	*35-152*			
Matrix Spike Dup Source: 2204152-03	**Prepared: 04/15/22 Analyzed: 04/18/22**									
Aldrin	10.5	2.00	ug/kg	12.50	ND	84.3	31-119	2.22	30	
gamma-BHC (Lindane)	7.41	2.00	ug/kg	12.50	ND	59.3	26-115	3.49	30	
4,4´-DDT	11.2	4.00	ug/kg	25.00	ND	44.8	7-151	10.5	30	
Dieldrin	17.8	2.00	ug/kg	25.00	ND	71.1	30-141	3.04	30	
Endrin	16.1	2.00	ug/kg	25.00	ND	64.4	25-161	6.03	30	
Heptachlor	8.15	2.00	ug/kg	12.50	ND	65.2	28-163	3.84	30	
Surrogate: 2,4,5,6 Tetrachloro-m-xylene	*8.10*		ug/kg	*12.50*		*64.8*	*40-117*			
Surrogate: Decachlorobiphenyl	*7.43*		ug/kg	*12.50*		*59.5*	*35-152*			
Batch BD21833 - EPA 3050B										
Blank	**Prepared: 04/14/22 Analyzed: 04/15/22**									
Antimony	ND	2.00	mg/kg							
Arsenic	ND	2.00	mg/kg							
Barium	ND	1.00	mg/kg							
Beryllium	ND	1.00	mg/kg							
Cadmium	ND	1.00	mg/kg							
Chromium	ND	1.00	mg/kg							
Cobalt	ND	1.00	mg/kg							
Copper	ND	1.00	mg/kg							
Lead	ND	1.00	mg/kg							
Molybdenum	ND	1.00	mg/kg							
Nickel	ND	1.00	mg/kg							
Selenium	ND	2.00	mg/kg							
Silver	ND	1.00	mg/kg							
Thallium	ND	2.00	mg/kg							
Vanadium	ND	1.00	mg/kg							
Zinc	ND	5.00	mg/kg							
LCS	**Prepared: 04/14/22 Analyzed: 04/15/22**									
Antimony	46.8	2.00	mg/kg	49.40		94.8	60-140			
Arsenic	47.4	2.00	mg/kg	49.33		96.1	80-120			
Barium	194	1.00	mg/kg	198.1		98.0	80-120			
Beryllium	4.59	1.00	mg/kg	5.000		91.9	80-120			
Cadmium	4.97	1.00	mg/kg	5.000		99.3	80-120			
Chromium	19.7	1.00	mg/kg	19.91		99.0	80-120			
Cobalt	50.0	1.00	mg/kg	50.00		100	80-120			
Copper	23.7	1.00	mg/kg	25.10		94.5	80-120			

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Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204151

Project: 84WRR

Quality Control Data

Analyte	Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BD21833 - EPA 3050B										
Lead	49.7	1.00	mg/kg	49.97		99.5	80-120			
Molybdenum	45.9	1.00	mg/kg	49.85		92.0	80-120			
Nickel	49.6	1.00	mg/kg	50.00		99.1	80-120			
Selenium	46.9	2.00	mg/kg	49.60		94.6	80-120			
Silver	4.73	1.00	mg/kg	5.000		94.6	80-120			
Thallium	49.5	2.00	mg/kg	49.80		99.4	80-120			
Vanadium	46.1	1.00	mg/kg	50.10		92.0	80-120			
Zinc	47.0	5.00	mg/kg	49.82		94.2	80-120			
Matrix Spike **Source: 2204151-01**	**Prepared: 04/14/22 Analyzed: 04/15/22**									
Antimony	40.7	2.00	mg/kg	49.40	ND	82.3	60-140			
Arsenic	50.2	2.00	mg/kg	49.33	4.60	92.4	75-125			
Barium	250	1.00	mg/kg	198.1	57.8	97.1	75-125			
Beryllium	4.92	1.00	mg/kg	5.000	0.462	89.1	75-125			
Cadmium	4.97	1.00	mg/kg	5.000	0.306	93.2	75-125			
Chromium	36.3	1.00	mg/kg	19.91	17.2	96.0	75-125			
Cobalt	54.0	1.00	mg/kg	50.00	7.65	92.8	75-125			
Copper	39.1	1.00	mg/kg	25.10	14.4	98.4	75-125			
Lead	60.7	1.00	mg/kg	49.97	12.5	96.5	75-125			
Molybdenum	42.3	1.00	mg/kg	49.85	ND	84.8	75-125			
Nickel	58.0	1.00	mg/kg	50.00	12.5	91.1	75-125			
Selenium	46.7	2.00	mg/kg	49.60	1.18	91.8	75-125			
Silver	4.38	1.00	mg/kg	5.000	ND	87.5	75-125			
Thallium	42.6	2.00	mg/kg	49.80	ND	85.6	75-125			
Vanadium	77.1	1.00	mg/kg	50.10	32.3	89.6	75-125			
Zinc	110	5.00	mg/kg	49.82	52.8	114	75-125			
Matrix Spike Dup **Source: 2204151-01**	**Prepared: 04/14/22 Analyzed: 04/15/22**									
Antimony	42.3	2.00	mg/kg	49.40	ND	85.6	60-140	3.86	30	
Arsenic	50.1	2.00	mg/kg	49.33	4.60	92.2	75-125	0.226	30	
Barium	241	1.00	mg/kg	198.1	57.8	92.3	75-125	5.17	30	
Beryllium	4.99	1.00	mg/kg	5.000	0.462	90.5	75-125	1.54	30	
Cadmium	5.01	1.00	mg/kg	5.000	0.306	94.1	75-125	0.899	30	
Chromium	35.7	1.00	mg/kg	19.91	17.2	93.1	75-125	3.06	30	
Cobalt	54.6	1.00	mg/kg	50.00	7.65	93.9	75-125	1.24	30	
Copper	38.2	1.00	mg/kg	25.10	14.4	94.8	75-125	3.74	30	
Lead	58.4	1.00	mg/kg	49.97	12.5	91.8	75-125	4.99	30	
Molybdenum	43.0	1.00	mg/kg	49.85	ND	86.2	75-125	1.61	30	
Nickel	58.7	1.00	mg/kg	50.00	12.5	92.5	75-125	1.51	30	
Selenium	46.7	2.00	mg/kg	49.60	1.18	91.8	75-125	0.0692	30	
Silver	4.40	1.00	mg/kg	5.000	ND	88.0	75-125	0.499	30	
Thallium	43.2	2.00	mg/kg	49.80	ND	86.7	75-125	1.22	30	

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

Orion Environmental, Inc.
2955 Redondo Beach Ave.
Long Beach, CA 90806

Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204151

Project: 84WRR

Quality Control Data

Analyte		Result	PQL	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Qualifier
Batch BD21833 - EPA 3050B											
Vanadium		77.1	1.00	mg/kg	50.10	32.3	89.6	75-125	0.0125	30	
Zinc		102	5.00	mg/kg	49.82	52.8	98.7	75-125	14.3	30	
Batch BD21831 - EPA 7471A											
Blank		**Prepared: 04/14/22 Analyzed: 04/15/22**									
Mercury		ND	0.100	mg/kg							
LCS		**Prepared: 04/14/22 Analyzed: 04/15/22**									
Mercury		0.759	0.100	mg/kg	0.8258		92.0	80-120			
Matrix Spike	**Source: 2204151-01**	**Prepared: 04/14/22 Analyzed: 04/15/22**									
Mercury		0.902	0.100	mg/kg	0.8258	ND	109	75-125			
Matrix Spike Dup	**Source: 2204151-01**	**Prepared: 04/14/22 Analyzed: 04/15/22**									
Mercury		0.778	0.100	mg/kg	0.8258	ND	94.2	75-125	14.7	25	

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the detection limit
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Rick Owen Parlier

Authorized Signature(s)

119441

POSITIVE LAB SERVICE

CHAIN OF CUSTODY AND ANALYSIS REQUEST

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

DATE: _____ PAGE _____ OF _____
LOG BOOK NO. _____ FILE NO. _____ LAB NO. 120451

CLIENT NAME: Orion Project Name/No. 84 WRR P.O. NO. AIRBILL NO:

ADDRESS: 2955 Redondo Ave Long Beach

PROJECT MANAGER: Adair Johnson PHONE NO: 562-888-2755 ~~562-245-9~~ FAX NO:

SAMPLER NAME: Adair Johnson (Printed) (Signature)

OBSERV. TEMP: 3.2 °C
CORREC. TEMP: 3 °C
THERMO ID: 66 BY:

TAT (Analytical Turn Around Time): 0 = Same Day; 1 = 1 Day; 2 = 2 Days; 3 = 3 Days; N = Normal (5-7 Working Days)

CONTAINER TYPES: B = Brass, E = Encore, G = Glass, P = Plastic, V = VOA Vial, O = Other:

UST Project: Y N - Global ID# ___ ___ ___ ___ ___ ___ ___ ___ ___ ___

ANALYSES REQUESTED: OCP 8081 | OPP 8141 | Herbicides 8151 | Title 22 metals | PRESERVATIVE:

REMARKS:

	SAMPLE NO.	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	OCP 8081	OPP 8141	Herbicides 8151	Title 22 metals	SAMPLE CONDITION/ CONTAINER /COMMENTS:
1	SS-1	4/12/22	1300			X			3	1	G	X	X	X	X	
2	SS-2	↓	1305			X			3	1	G	X	X	X	X	
3																
4																
5																
6																
7																
8																
9																
10																

Relinquished By: (Signature and Printed Name) Adair Johnson
Received By: (Signature and Printed Name) [illegible] Date: 4/14/22 Time: 10:55

Relinquished By: (Signature and Printed Name)
Received By: (Signature and Printed Name) Date: Time:

Relinquished By: (Signature and Printed Name)
Received By: (Signature and Printed Name) Date: Time:

SPECIAL INSTRUCTIONS: Arrived at the lab 4/14/22 12:18

SAMPLE DISPOSITION:
1. Samples returned to client? YES NO
2. Samples will not be stored over 30 days, unless additional storage time is requested.
3. Storage time requested: _____ days

By _____ Date _____

PRESERVATIVE: 1-HNO_3, 2-H_2SO_4, 3-HCL, 4-Zinc Acetate, 5-NaOH, 6-NH_4 Buffer, 7-Other

LAB COPY

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

Orion Environmental, Inc.
2955 Redondo Beach Ave.
Long Beach, CA 90806

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204153

Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759
Project: 84WRR

Sample ID: SS-18 Soil (2204153-01) Sampled:04/13/22 08:13 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-19 Soil (2204153-02) Sampled:04/13/22 08:25 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-16 Soil (2204153-03) Sampled:04/13/22 08:44 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-15 Soil (2204153-04) Sampled:04/13/22 08:57 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-14 Soil (2204153-05) Sampled:04/13/22 09:07 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-17 Soil (2204153-06) Sampled:04/13/22 09:19 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-13 Soil (2204153-07) Sampled:04/13/22 09:37 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-12 Soil (2204153-08) Sampled:04/13/22 09:53 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

Sample ID: SS-11 Soil (2204153-09) Sampled:04/13/22 10:13 Received: 04/14/22

Analyte	Results	Flag	D.F.	Units	PQL	Prep/Test Method	Prepared	Analyzed	By	Batch
EPA TO-15 Volatile Organic Compounds	See Attachment									

POSITIVE LAB SERVICE

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

Certificate of Analysis

Orion Environmental, Inc.
2955 Redondo Beach Ave.
Long Beach, CA 90806

File #:73287
Report Date: 04/19/22
Submitted: 04/14/22
PLS Report No.: 2204153

Attn: Adair Johnson Phone: (562) 988-2755 FAX:(562) 988-2759
Project: 84WRR

Notes and Definitions

NA	Not Applicable
ND	Analyte NOT DETECTED at or above the reported limit(s)
NR	Not Reported
MDL	Method Detection Limit
PQL	Practical Quantitation Limit

Environmental Laboratory Accreditation Program Certificate No. 1131, Mobile Lab No. 2534, LACSD No. 10138

Rick Owen Parlier

Authorized Signature(s)

AIR TECHNOLOGY
Laboratories, Inc.

April 19, 2022

LA Cert #04140
EPA Methods TO3, TO14A, TO15, 25C/3C, ASTM D1946, RSK-175
TX Cert T104704450-14-6
EPA Methods TO14A, TO15
UT Cert CA0133332015-3
EPA Methods TO3, TO14A, TO15, RSK-175

Positive Lab Service
ATTN: Dinora Sanchez
781 E. Washington Blvd.
Los Angeles, CA 90021

LABORATORY TEST RESULTS

Project Reference: 2204153
Lab Number: N041405-01/09

Enclosed are results for sample(s) received 4/14/22 by Air Technology Laboratories. Samples were received intact. Analyses were performed according to specifications on the chain of custody provided with the sample(s).

Report Narrative:

- Unless otherwise noted in the report, sample analyses were performed within method performance criteria and meet all requirements of the TNI Standards.
- The enclosed results relate only to the sample(s).

ATL appreciates the opportunity to provide testing services to your company. If you have any questions regarding these results, please call me at (626) 964-4032.

Sincerely,

Mark Johnson
Operations Manager
MJohnson@AirTechLabs.com

Note: The cover letter is an integral part of this analytical report.

N041405-01/09

POSITIVE LAB SERVICE

CHAIN OF CUSTODY AND ANALYSIS REQUEST

DATE: 4/14/22 PAGE 1 OF 1

781 East Washington Blvd., Los Angeles, CA 90021
(213) 745-5312 FAX (213) 745-6372

AIRBILL NO:

LOG BOOK NO. FILE NO. LAB NO.

CLIENT NAME: P.L.S. Project Name/No. 1204153 P.O. NO. 19053

ADDRESS:

PROJECT MANAGER: Dinora Sanchez (213) PHONE NO: 745.5312 FAX NO:

SAMPLER NAME: (Printed) (Signature)

TAT (Analytical Turn Around Time): 0 = Same Day; 1 = 1 Day; 2 = 2 Days; 3 = 3 Days; N = Normal (5-7 Working Days): RUSH

CONTAINER TYPES: B = Brass, E = Encore, G = Glass, P = Plastic, V = VOA Vial, O = Other: Summa

UST Project: Y (N) - Global ID# _____

ANALYSES REQUESTED: TO-15

OBSERV. TEMP:
CORREC. TEMP:
THERMO ID:
PRESERVATIVE:

REMARKS: TAT 72 Hrs

	SAMPLE NO.	DATE SAMPLED	TIME SAMPLED	SAMPLE DESCRIPTION	MATRIX: WATER	SOIL	SLUDGE	OTHER	TAT	CONTAINER: #	TYPE	SAMPLE CONDITION/ CONTAINER /COMMENTS:
1	01	4/13/22	813	SS-18				✓	72Hrs	1	Summa ✓	
2	02		825	SS-19								
3	03		844	SS-16								
4	04		857	SS-15								
5	05		907	SS-14								
6	06		919	SS-17								
7	07		937	SS-13								
8	08		953	SS-12								
9	09	↓	1013	SS-11				↓	↓	↓	↓	
10												

Relinquished By: (Signature and Printed Name) Received By: (Signature and Printed Name) Date: 4/14/22 Time: 1512

Relinquished By: (Signature and Printed Name) Received By: (Signature and Printed Name) Date: Time:

Relinquished By: (Signature and Printed Name) Received By: (Signature and Printed Name) Date: Time:

SPECIAL INSTRUCTIONS:

SAMPLE DISPOSITION:
1. Samples returned to client? YES NO
2. Samples will not be stored over 30 days, unless additional storage time is requested.
3. Storage time requested: _____ days
By _____ Date _____

PRESERVATIVE: 1-HNO_3, 2-H_2SO_4, 3-HCL, 4-Zinc Acetate, 5-NaOH, 6-NH_4 Buffer, 7-Other

Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N041405-01		N041405-02		N041405-03		N041405-04	
Client Sample I.D.:	SS-18		SS-19		SS-16		SS-15	
Date/Time Sampled:	4/13/22 8:13		4/13/22 8:25		4/13/22 8:44		4/13/22 8:57	
Date/Time Analyzed:	4/15/22 19:33		4/15/22 20:12		4/15/22 14:35		4/15/22 15:38	
QC Batch No.:	220415MS2A1		220415MS2A1		220415MS2A1		220415MS2A1	
Analyst Initials:	DT		DT		DT		DT	
Dilution Factor:	1.9		2.1		1.9		10	
ANALYTE	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv
Dichlorodifluoromethane (12)	ND	1.9	ND	2.1	ND	1.9	ND	10
Chloromethane	ND	3.9	ND	4.2	ND	3.9	ND	20
1,2-Cl-1,1,2,2-F ethane (114)	ND	1.9	ND	2.1	ND	1.9	ND	10
Vinyl Chloride	ND	1.9	ND	2.1	ND	1.9	ND	10
Bromomethane	ND	1.9	ND	2.1	ND	1.9	ND	10
Chloroethane	ND	3.9	ND	4.2	ND	3.9	ND	20
Trichlorofluoromethane (11)	ND	1.9	ND	2.1	ND	1.9	ND	10
1,1-Dichloroethene	ND	1.9	ND	2.1	ND	1.9	ND	10
Carbon Disulfide	ND	3.9	ND	4.2	ND	3.9	ND	20
1,1,2-Cl 1,2,2-F ethane (113)	ND	1.9	ND	2.1	ND	1.9	ND	10
Acetone	12	3.9	9.9	4.2	34	3.9	78	20
Methylene Chloride	ND	1.9	ND	2.1	ND	1.9	ND	10
t-1,2-Dichloroethene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,1-Dichloroethane	ND	1.9	ND	2.1	ND	1.9	ND	10
Vinyl Acetate	ND	1.9	ND	2.1	ND	1.9	ND	10
c-1,2-Dichloroethene	ND	1.9	ND	2.1	ND	1.9	ND	10
2-Butanone	ND	1.9	2.5	2.1	15	1.9	ND	10
t-Butyl Methyl Ether (MTBE)	ND	1.9	ND	2.1	ND	1.9	ND	10
Chloroform	ND	1.9	ND	2.1	ND	1.9	ND	10
1,1,1-Trichloroethane	ND	1.9	ND	2.1	ND	1.9	ND	10
Carbon Tetrachloride	ND	1.9	ND	2.1	ND	1.9	ND	10
Benzene	4.6	1.9	ND	2.1	11	1.9	ND	10
1,2-Dichloroethane	ND	1.9	ND	2.1	ND	1.9	ND	10
Trichloroethene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,2-Dichloropropane	ND	1.9	ND	2.1	ND	1.9	ND	10
Bromodichloromethane	ND	1.9	ND	2.1	ND	1.9	ND	10
c-1,3-Dichloropropene	ND	1.9	ND	2.1	ND	1.9	ND	10
4-Methyl-2-Pentanone	ND	1.9	ND	2.1	11	1.9	ND	10
Toluene	44	1.9	9.2	2.1	350	1.9	1,200	10

Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N041405-01		N041405-02		N041405-03		N041405-04	
Client Sample I.D.:	SS-18		SS-19		SS-16		SS-15	
Date/Time Sampled:	4/13/22 8:13		4/13/22 8:25		4/13/22 8:44		4/13/22 8:57	
Date/Time Analyzed:	4/15/22 19:33		4/15/22 20:12		4/15/22 14:35		4/15/22 15:38	
QC Batch No.:	220415MS2A1		220415MS2A1		220415MS2A1		220415MS2A1	
Analyst Initials:	DT		DT		DT		DT	
Dilution Factor:	1.9		2.1		1.9		10	
ANALYTE	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv
t-1,3-Dichloropropene	ND	3.9	ND	4.2	ND	3.9	ND	20
1,1,2-Trichloroethane	ND	1.9	ND	2.1	ND	1.9	ND	10
Tetrachloroethene	ND	1.9	ND	2.1	ND	1.9	ND	10
2-Hexanone	ND	1.9	ND	2.1	ND	1.9	ND	10
Dibromochloromethane	ND	1.9	ND	2.1	ND	1.9	ND	10
1,2-Dibromoethane	ND	1.9	ND	2.1	ND	1.9	ND	10
Chlorobenzene	ND	1.9	ND	2.1	ND	1.9	ND	10
Ethylbenzene	2.4	1.9	ND	2.1	12	1.9	71	10
p,&m-Xylene	8.3	1.9	ND	2.1	35	1.9	270	10
o-Xylene	2.2	1.9	ND	2.1	8.0	1.9	65	10
Styrene	ND	1.9	ND	2.1	4.7	1.9	17	10
Bromoform	ND	1.9	ND	2.1	ND	1.9	ND	10
1,1,2,2-Tetrachloroethane	ND	1.9	ND	2.1	ND	1.9	ND	10
Benzyl Chloride	ND Q	4.9	ND Q	5.3	ND Q	4.9	ND Q	25
4-Ethyl Toluene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,3,5-Trimethylbenzene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,2,4-Trimethylbenzene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,3-Dichlorobenzene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,4-Dichlorobenzene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,2-Dichlorobenzene	ND	1.9	ND	2.1	ND	1.9	ND	10
1,2,4-Trichlorobenzene	ND	1.9	ND	2.1	ND	1.9	ND	10
Hexachlorobutadiene	ND	1.9	ND	2.1	ND	1.9	ND	10

ND = Not Detected (below RL)
RL = Reporting Limit
Q = Estimated. Analyte exceeded initial calibration QC criteria.

Reviewed/Approved By: _____ Date 4/19/22
Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N041405-05		N041405-06		N041405-07		N041405-08	
Client Sample I.D.:	SS-14		SS-17		SS-13		SS-12	
Date/Time Sampled:	4/13/22 9:07		4/13/22 9:19		4/13/22 9:37		4/13/22 9:53	
Date/Time Analyzed:	4/15/22 16:17		4/15/22 16:56		4/15/22 17:35		4/15/22 18:15	
QC Batch No.:	220415MS2A1		220415MS2A1		220415MS2A1		220415MS2A1	
Analyst Initials:	DT		DT		DT		DT	
Dilution Factor:	19		1.9		2.0		1.9	
ANALYTE	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv
Dichlorodifluoromethane (12)	ND	19	ND	1.9	ND	2.0	ND	1.9
Chloromethane	ND	37	ND	3.7	ND	4.0	ND	3.9
1,2-Cl-1,1,2,2-F ethane (114)	ND	19	ND	1.9	ND	2.0	ND	1.9
Vinyl Chloride	ND	19	ND	1.9	ND	2.0	ND	1.9
Bromomethane	ND	19	ND	1.9	ND	2.0	ND	1.9
Chloroethane	ND	37	ND	3.7	ND	4.0	ND	3.9
Trichlorofluoromethane (11)	ND	19	ND	1.9	ND	2.0	ND	1.9
1,1-Dichloroethene	ND	19	ND	1.9	ND	2.0	ND	1.9
Carbon Disulfide	ND	37	ND	3.7	ND	4.0	ND	3.9
1,1,2-Cl 1,2,2-F ethane (113)	ND	19	ND	1.9	ND	2.0	ND	1.9
Acetone	43	37	17	3.7	31	4.0	80	3.9
Methylene Chloride	ND	19	ND	1.9	ND	2.0	ND	1.9
t-1,2-Dichloroethene	ND	19	ND	1.9	ND	2.0	ND	1.9
1,1-Dichloroethane	ND	19	ND	1.9	ND	2.0	ND	1.9
Vinyl Acetate	ND	19	ND	1.9	ND	2.0	ND	1.9
c-1,2-Dichloroethene	ND	19	ND	1.9	ND	2.0	ND	1.9
2-Butanone	ND	19	ND	1.9	12	2.0	39	1.9
t-Butyl Methyl Ether (MTBE)	ND	19	ND	1.9	ND	2.0	ND	1.9
Chloroform	ND	19	ND	1.9	ND	2.0	ND	1.9
1,1,1-Trichloroethane	ND	19	ND	1.9	ND	2.0	ND	1.9
Carbon Tetrachloride	ND	19	ND	1.9	ND	2.0	ND	1.9
Benzene	43	19	ND	1.9	40	2.0	29	1.9
1,2-Dichloroethane	ND	19	ND	1.9	ND	2.0	ND	1.9
Trichloroethene	ND	19	ND	1.9	ND	2.0	ND	1.9
1,2-Dichloropropane	ND	19	ND	1.9	ND	2.0	ND	1.9
Bromodichloromethane	ND	19	ND	1.9	ND	2.0	ND	1.9
c-1,3-Dichloropropene	ND	19	ND	1.9	ND	2.0	ND	1.9
4-Methyl-2-Pentanone	ND	19	ND	1.9	ND	2.0	17	1.9
Toluene	2,000	19	ND	1.9	240	2.0	150	1.9

18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N041405-05		N041405-06		N041405-07		N041405-08	
Client Sample I.D.:	SS-14		SS-17		SS-13		SS-12	
Date/Time Sampled:	4/13/22 9:07		4/13/22 9:19		4/13/22 9:37		4/13/22 9:53	
Date/Time Analyzed:	4/15/22 16:17		4/15/22 16:56		4/15/22 17:35		4/15/22 18:15	
QC Batch No.:	220415MS2A1		220415MS2A1		220415MS2A1		220415MS2A1	
Analyst Initials:	DT		DT		DT		DT	
Dilution Factor:	19		1.9		2.0		1.9	
ANALYTE	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv	Result ppbv	RL ppbv
t-1,3-Dichloropropene	ND	37	ND	3.7	ND	4.0	ND	3.9
1,1,2-Trichloroethane	ND	19	ND	1.9	ND	2.0	ND	1.9
Tetrachloroethene	ND	19	ND	1.9	ND	2.0	ND	1.9
2-Hexanone	ND	19	ND	1.9	ND	2.0	ND	1.9
Dibromochloromethane	ND	19	ND	1.9	ND	2.0	ND	1.9
1,2-Dibromoethane	ND	19	ND	1.9	ND	2.0	ND	1.9
Chlorobenzene	ND	19	ND	1.9	ND	2.0	ND	1.9
Ethylbenzene	48	19	ND	1.9	13	2.0	10	1.9
p,&m-Xylene	140	19	ND	1.9	41	2.0	29	1.9
o-Xylene	31	19	ND	1.9	10	2.0	8.0	1.9
Styrene	ND	19	2.5	1.9	11	2.0	37	1.9
Bromoform	ND	19	ND	1.9	ND	2.0	ND	1.9
1,1,2,2-Tetrachloroethane	ND	19	ND	1.9	ND	2.0	ND	1.9
Benzyl Chloride	ND Q	47	ND Q	4.7	ND Q	5.1	ND Q	4.9
4-Ethyl Toluene	ND	19	ND	1.9	2.2	2.0	2.1	1.9
1,3,5-Trimethylbenzene	ND	19	ND	1.9	ND	2.0	ND	1.9
1,2,4-Trimethylbenzene	ND	19	ND	1.9	ND	2.0	ND	1.9
1,3-Dichlorobenzene	ND	19	ND	1.9	ND	2.0	ND	1.9
1,4-Dichlorobenzene	ND	19	ND	1.9	ND	2.0	ND	1.9
1,2-Dichlorobenzene	ND	19	ND	1.9	ND	2.0	ND	1.9
1,2,4-Trichlorobenzene	ND	19	ND	1.9	ND	2.0	ND	1.9
Hexachlorobutadiene	ND	19	ND	1.9	ND	2.0	ND	1.9

ND = Not Detected (below RL)
RL = Reporting Limit
Q = Estimated. Analyte exceeded initial calibration QC criteria.

Reviewed/Approved By: _____ Date 4/19/22
Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N041405-09
Client Sample I.D.:	SS-11
Date/Time Sampled:	4/13/22 10:13
Date/Time Analyzed:	4/15/22 18:54
QC Batch No.:	220415MS2A1
Analyst Initials:	DT
Dilution Factor:	1.8

ANALYTE	Result ppbv	RL ppbv
Dichlorodifluoromethane (12)	ND	1.8
Chloromethane	ND	3.6
1,2-Cl-1,1,2,2-F ethane (114)	ND	1.8
Vinyl Chloride	ND	1.8
Bromomethane	ND	1.8
Chloroethane	ND	3.6
Trichlorofluoromethane (11)	ND	1.8
1,1-Dichloroethene	ND	1.8
Carbon Disulfide	ND	3.6
1,1,2-Cl 1,2,2-F ethane (113)	ND	1.8
Acetone	97	3.6
Methylene Chloride	ND	1.8
t-1,2-Dichloroethene	ND	1.8
1,1-Dichloroethane	ND	1.8
Vinyl Acetate	ND	1.8
c-1,2-Dichloroethene	ND	1.8
2-Butanone	21	1.8
t-Butyl Methyl Ether (MTBE)	ND	1.8
Chloroform	ND	1.8
1,1,1-Trichloroethane	ND	1.8
Carbon Tetrachloride	ND	1.8
Benzene	5.5	1.8
1,2-Dichloroethane	ND	1.8
Trichloroethene	ND	1.8
1,2-Dichloropropane	ND	1.8
Bromodichloromethane	ND	1.8
c-1,3-Dichloropropene	ND	1.8
4-Methyl-2-Pentanone	ND	1.8
Toluene	63	1.8

Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	N041405-09
Client Sample I.D.:	SS-11
Date/Time Sampled:	4/13/22 10:13
Date/Time Analyzed:	4/15/22 18:54
QC Batch No.:	220415MS2A1
Analyst Initials:	DT
Dilution Factor:	1.8

ANALYTE	Result ppbv	RL ppbv
t-1,3-Dichloropropene	ND	3.6
1,1,2-Trichloroethane	ND	1.8
Tetrachloroethene	ND	1.8
2-Hexanone	ND	1.8
Dibromochloromethane	ND	1.8
1,2-Dibromoethane	ND	1.8
Chlorobenzene	ND	1.8
Ethylbenzene	5.4	1.8
p,&m-Xylene	18	1.8
o-Xylene	5.2	1.8
Styrene	29	1.8
Bromoform	ND	1.8
1,1,2,2-Tetrachloroethane	ND	1.8
Benzyl Chloride	ND Q	4.5
4-Ethyl Toluene	ND	1.8
1,3,5-Trimethylbenzene	ND	1.8
1,2,4-Trimethylbenzene	ND	1.8
1,3-Dichlorobenzene	ND	1.8
1,4-Dichlorobenzene	ND	1.8
1,2-Dichlorobenzene	ND	1.8
1,2,4-Trichlorobenzene	ND	1.8
Hexachlorobutadiene	ND	1.8

ND = Not Detected (below RL)
RL = Reporting Limit
Q = Estimated. Analyte exceeded initial calibration QC criteria.

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Mark Johnson
Operations Manager

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18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	METHOD_BLANK
Client Sample I.D.:	-
Date/Time Sampled:	-
Date/Time Analyzed:	4/15/22 13:48
QC Batch No.:	220415MS2A1
Analyst Initials:	DT
Dilution Factor:	0.20

ANALYTE	Result ppbv	RL ppbv
Dichlorodifluoromethane (12)	ND	0.20
Chloromethane	ND	0.40
1,2-Cl-1,1,2,2-F ethane (114)	ND	0.20
Vinyl Chloride	ND	0.20
Bromomethane	ND	0.20
Chloroethane	ND	0.40
Trichlorofluoromethane (11)	ND	0.20
1,1-Dichloroethene	ND	0.20
Carbon Disulfide	ND	0.40
1,1,2-Cl 1,2,2-F ethane (113)	ND	0.20
Acetone	ND	0.40
Methylene Chloride	ND	0.20
t-1,2-Dichloroethene	ND	0.20
1,1-Dichloroethane	ND	0.20
Vinyl Acetate	ND	0.20
c-1,2-Dichloroethene	ND	0.20
2-Butanone	ND	0.20
t-Butyl Methyl Ether (MTBE)	ND	0.20
Chloroform	ND	0.20
1,1,1-Trichloroethane	ND	0.20
Carbon Tetrachloride	ND	0.20
Benzene	ND	0.20
1,2-Dichloroethane	ND	0.20
Trichloroethene	ND	0.20
1,2-Dichloropropane	ND	0.20
Bromodichloromethane	ND	0.20
c-1,3-Dichloropropene	ND	0.20
4-Methyl-2-Pentanone	ND	0.20
Toluene	ND	0.20

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Client: Positive Lab Service
Attn: Dinora Sanchez
Project Name: NA
Project No.: 2204153
Date Received: 04/14/22
Matrix: Air
Reporting Units: ppbv

EPA Method TO15

Lab No.:	METHOD_BLANK
Client Sample I.D.:	-
Date/Time Sampled:	-
Date/Time Analyzed:	4/15/22 13:48
QC Batch No.:	220415MS2A1
Analyst Initials:	DT
Dilution Factor:	0.20

ANALYTE	Result ppbv	RL ppbv
t-1,3-Dichloropropene	ND	0.40
1,1,2-Trichloroethane	ND	0.20
Tetrachloroethene	ND	0.20
2-Hexanone	ND	0.20
Dibromochloromethane	ND	0.20
1,2-Dibromoethane	ND	0.20
Chlorobenzene	ND	0.20
Ethylbenzene	ND	0.20
p,&m-Xylene	ND	0.20
o-Xylene	ND	0.20
Styrene	ND	0.20
Bromoform	ND	0.20
1,1,2,2-Tetrachloroethane	ND	0.20
Benzyl Chloride	ND Q	0.50
4-Ethyl Toluene	ND	0.20
1,3,5-Trimethylbenzene	ND	0.20
1,2,4-Trimethylbenzene	ND	0.20
1,3-Dichlorobenzene	ND	0.20
1,4-Dichlorobenzene	ND	0.20
1,2-Dichlorobenzene	ND	0.20
1,2,4-Trichlorobenzene	ND	0.20
Hexachlorobutadiene	ND	0.20

ND = Not Detected (below RL)
RL = Reporting Limit
Q = Estimated. Analyte exceeded initial calibration QC criteria.

Reviewed/Approved By: _____ Date 4/19/22
Mark Johnson
Operations Manager

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18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

LCS/LCSD Recovery and RPD Summary Report

QC Batch #: 220415MS2A1

Matrix: Air

Reporting Units: ppbv

EPA Method TO15
LABORATORY CONTROL SAMPLE SUMMARY

Lab No.:	METHOD BLANK			LCS		LCSD					
Date/Time Analyzed:	4/15/22 13:48			4/15/22 12:30		4/15/22 13:09					
Analyst Initials:	DT			DT		DT					
Dilution Factor:	0.20			1.0		1.0					
ANALYTE	Result ppbv	RL ppbv	AMT. ppbv	Result ppbv	% Rec.	Result ppbv	% Rec.	RPD	Low %Rec	High %Rec	Max. RPD
1,1-Dichloroethene	ND	0.20	10	9.79	97.9	9.59	95.9	2.0	70	130	30.0
Methylene Chloride	ND	0.20	10	9.97	99.7	9.81	98.1	1.6	70	130	30.0
Trichloroethene	ND	0.20	10	9.58	95.8	9.61	96.1	0.2	70	130	30.0
Toluene	ND	0.20	10	9.32	93.2	9.53	95.3	2.2	70	130	30.0
1,1,2,2-Tetrachloroethane	ND	0.20	10	8.44	84.4	8.72	87.2	3.2	70	130	30.0

ND = Not Detected (below RL)
RL = Reporting Limit

Reviewed/Approved By: _____ Date: 4/19/22
Mark Johnson
Operations Manager

The cover letter is an integral part of this analytical report

AirTECHNOLOGY Laboratories, Inc.
18501 E. Gale Avenue, Suite 130 ♦ City of Industry, CA 91748 ♦ Ph: (626) 964-4032 ♦ Fx: (626) 964-5832

2204153

AirTECHNOLOGY Laboratories, Inc.

18501 E. Gale Ave., Suite 130
City of Industry, CA 91748
Ph: 626-964-4032
Fx: 626-964-5832

CHAIN OF CUSTODY RECORD

TURNAROUND TIME

Standard ☐ 48 hours ☐
Same Day ☐ 72 hours ☒
24 hours ☐ 96 hours ☐
Other:

DELIVERABLES

EDD ☐
EDF ☐
LEVEL 3 ☐
LEVEL 4 ☐

PAGE: OF

Condition upon receipt:
Sealed Yes ☐ No ☐
Intact Yes ☐ No ☐
Chilled _____ deg C

Project No.:	84 WRR
Project Name:	Willow Road Rialto
Report To:	Adair Johnson
Company:	Orion Environmental
Street:	2955 Redondo Avenue
City/State/Zip:	Long Beach, CA 90806
Phone& Fax:	562 988-0551
e-mail:	ajohnson@orionenv.com

BILLING

P.O. No.:
Bill to:

ANALYSIS REQUEST

TO-15

LAB USE ONLY	SAMPLE IDENTIFICATION	SAMPLE DATE	SAMPLE TIME	MATRIX	CONTAINER TYPE	TO-15
	SS-18	4/13/22	0813	V	Summa	X
	SS-19		0825			X
	SS-16		0844			X
	SS-15		0857			X
	SS-14		0907			X
	SS-17		0919			X
	SS-13		0937			X
	SS-12		0953			X
	SS-11	↓	1013	↓	↓	X

AUTHORIZATION TO PERFORM WORK: Adair Johnson	COMPANY: Orion	DATE/TIME: 4/13/22	1623
SAMPLED BY: Adair Johnson	COMPANY: Orion	DATE/TIME: 4/13/22	1623
RELINQUISHED BY: Adair Johnson	DATE/TIME:	RECEIVED BY: [signature]	DATE/TIME: 4/14/22 10:55
RELINQUISHED BY:	DATE/TIME:	RECEIVED BY:	DATE/TIME:
RELINQUISHED BY:	DATE/TIME:	RECEIVED BY:	DATE/TIME:

METHOD OF TRANSPORT (circle one): Walk-In FedEx UPS Courier ATLI Other _____

COMMENTS

OBSERV. TEMP: 24.3 °C
CORREC. TEMP: 24 °C
THERMO ID: 16 BY: EC

Arrived at the lab 4/14/22 12:18

DISTRIBUTION: White & Yellow - Lab Copies / Pink - Customer Copy

Preservation: **H**=HCL **N**=None / Container: **B**=Bag **C**=Can **V**=VOA **O**=Other

Rev. 03 - 5/7/09

Task	Cost Estimate ($)
Remedial action implementation	
Soil management plan preparation and implementation	25,000
VIMS construction *120,000 square foot building at $4 to $5 per square foot and 10 percent engineering and oversight costs*	528,000 to 660,000
Operation and maintenance plan, land and use covenant, and financial assurance preparation and submittal	35,000
Remedial action completion report submittal	25,000
Total Estimated Costs	**$738,000 to $870,000**

Total estimated costs range from approximately $738,000 to $870,000 without any contingencies and assuming no export of impacted shallow soils. Although Orion considers this a reasonable assumption, the regulatory agency will need to consider and approve. It is recommended that a soil export contingency budget be established for a reasonable volume of soils that may originate from "spot excavations." Scannell should also expect that long-term operation maintenance and monitoring will be required into the future after redevelopment and installation of the VIMS. This may include some or all of the following: sampling of vapor monitoring probes; indoor air sampling; and five-year reviews. Depending on agency availability to review and approve documents, the remediation implementation process may take between 9 to 16 months, once the SSI and HHSRE activities are initiated.

Assumptions

Orion's remediation cost estimate is based on the following assumptions, in addition to what was listed above.

1. Available data does not suggest gross contamination to soil or groundwater and elevated soil vapor concentrations are limited to area of soil impacts.

2. Although vapor concentrations exceed conservative screening thresholds for vapor intrusion, they are likely not high enough to require active remediation prior to any future industrial development.

3. The regulatory agency will likely require vapor mitigation following the completion of additional investigation activities to delineate impacts.