

**Phase I Environmental Site Assessment
Torrance Commerce Center II
2271-2341 W. 205th Street
Torrance, California 90501**

**January 26, 2009
LFR Project #002-11280-00**

Prepared for
The Koll Company
4343 Von Karman Avenue, Suite 150
Newport Beach, California 92660

Prepared by
LFR Inc.
3150 Bristol Street, Suite 250
Costa Mesa, California 92626



ENVIRONMENTAL MANAGEMENT & CONSULTING ENGINEERING

January 26, 2009

002-11280-00

Mr. John Woo
Director of Acquisitions
The Koll Company
4343 Von Karman Avenue, Suite 150
Newport Beach, California 92660

Subject: Phase I Environmental Site Assessment, Torrance Commerce Center II,
2271-2341 W. 205th Street, Torrance, California

Dear Mr. Woo:

LFR Inc. (LFR) has prepared this Phase I Environmental Site Assessment (ESA) for Torrance Commerce Center II located in Torrance, California ("the Site"). This Phase I ESA was conducted on behalf of The Koll Company (Koll). The conclusions presented in this report are based on the results of a reconnaissance-level site visit conducted by LFR personnel, and a review of available and pertinent background information.

LFR appreciates this opportunity to provide consulting services to Koll. If you have any questions concerning this project, or would like to discuss other environmental concerns, please contact me at 714-444-0111.

Sincerely,

A handwritten signature in black ink, appearing to read 'Janet Holtz', is written over the typed name and title below it.

Janet Holtz, REA
Due Diligence Group Manager

Attachment

EXECUTIVE SUMMARY

LFR Inc. (LFR) has prepared this Phase I Environmental Site Assessment (ESA) for Torrance Commerce Center II located at 2271-2341 W. 205th Street in Torrance, Los Angeles County, California (“the Site”). The 6.25-acre parcel is improved with six multi-tenant commercial buildings totaling 111,981 square feet of space. This Phase I ESA was conducted on behalf of The Koll Company (Koll).

Background

Based on LFR’s historical research, the Site was agricultural land on a 1928 aerial photograph. From approximately 1956 to at least 1976, the Site appeared to have been used by a factory to the south and west of the Site for vehicle parking. There did not appear to be any structures on site or other uses of the Site until construction of the current improvements in 1985. LFR’s historical research of the Site did not identify past uses of the Site that would indicate a current environmental concern. The surrounding area has included oil tank farms, an oil refinery, factories, and other industrial uses.

Site Inspection

On the day of LFR’s Site inspection, the rectangular-shaped Site was improved with six one- and two-story concrete tilt-up buildings evenly spaced throughout the property. Well-maintained landscaping is present throughout the Site and includes decorative walking and sitting areas between several of the buildings. Asphalt-paved parking lots and driveways with concrete swales comprise the remainder of the Site. Dumpster enclosures were observed at the rear of the Site.

The interiors of the 47 occupied tenant spaces consisted of typical office improvements and warehouse storage areas. Several tenants were observed to be storing and using hazardous materials in relatively small quantities. No hazardous waste storage was observed. One tenant collects SHARPS waste (syringes, razor blades, tubing, etc.) in three poly drums. No concerns were noted with the storage and use of chemicals on site. The majority of the tenants were office use only with warehouse areas storing non-hazardous items. All tenants observed appeared to maintain good housekeeping practices. There were five vacant tenant spaces on site.

There are no maintenance shops or offices on site and janitorial services are handled independently by each tenant. Landscaping is performed by an off-site vendor and no pesticides or insecticides are stored on site.

During the inspection, no distressed vegetation, excessive surface staining, monitoring wells, sumps, clarifiers, or remediation systems were observed on the Site. There was no evidence of current aboveground storage tanks or underground storage tanks onsite. In general, the property was well-maintained and no environmental concerns were observed.

Based on the date of building construction (1985), it is unlikely that asbestos-containing materials (ACMs) and lead-based paint (LBP) are present in the Site buildings. In addition, LFR did not observe any areas of excessive water intrusion or microbial amplification onsite.

The Site is bounded to the north by private residences; to the east and west by commercial buildings; and to the south by W. 205th Street followed by commercial buildings. None of the adjacent properties appeared to present an environmental concern to the Site.

Regulatory Records

An environmental database report prepared by Environmental Data Resources, Inc. (EDR) was reviewed for local, state and federal listings for the Site addresses and properties within the Site vicinity. Regulatory database lists were reviewed for cases pertaining to leaking underground storage tanks and aboveground storage tanks, hazardous waste sites, and abandoned sites within the specified radii of standards established by American Society for Testing and Materials (ASTM) guidelines. No on-site addresses were listed.

Numerous off-site facilities with known or suspected contamination were listed in the EDR database report. However, many formerly contaminated properties have been cleaned up and reused and/or are too distant or in hydraulically cross- to downgradient directions with respect to groundwater flow to represent an environmental concern to the Site. However, LFR discovered that a groundwater monitoring well located approximately 1,000 feet south-southwest of the Site is contaminated with 1,1-dichloroethylene (1,1-DCE) above the California Maximum Contaminant Level of 6.0 micrograms per liter ($\mu\text{g/l}$) at a depth greater than 145 feet below ground surface. According to a representative of the Department of Toxic Substances Control (DTSC), this finding does not indicate a risk of vapor intrusion to surrounding businesses. In addition, according to a LFR Toxicologist, 1,1-DCE is not a carcinogen and does not indicate a hazard at the depth and level detected ($85 \mu\text{g/l}$). Based on the past and current uses of the Site, the Site does not appear to have contributed to any nearby groundwater contamination nor has it been suspected of contributing by regulatory agencies. However, it is possible that VOC-impacted groundwater from an off-site source underlies the Site at depth. According to the DTSC, unless the Site was identified as a principal responsible party (PRP), the DTSC would not require the Site owner to remediate groundwater associated with that contamination in the event contaminated groundwater underlies the Site. The Site has not been identified by the DTSC or any other regulatory agency as a PRP for groundwater contamination.

LFR contacted the DTSC, the Regional Water Quality Control Board, the Los Angeles County Health Department, the Los Angeles County Department of Public Works, and the Torrance Fire Department for records on file for the Site addresses. LFR did not obtain any information that would indicate an environmental concern for the Site.

Conclusions

LFR has performed a Phase I ESA of the Site in conformance with the scope and limitations of ASTM Practice E 1527-05 for Phase I ESAs. This assessment has revealed no evidence of recognized environmental conditions in connection with the Site, and no further investigation is recommended at this time.

CONTENTS

| | |
|--|---|
| EXECUTIVE SUMMARY | i |
| 1.0 INTRODUCTION | 1 |
| 1.1 Objective..... | 1 |
| 1.2 Detailed Scope of Services..... | 1 |
| 1.3 Significant Assumptions..... | 2 |
| 1.4 Limitations and Exceptions | 2 |
| 1.5 Special Terms and Conditions..... | 3 |
| 2.0 Site Overview | 3 |
| 2.1 Site Location and Description | 3 |
| 2.2 Site and Vicinity General Characteristics..... | 3 |
| 2.3 Site Improvements..... | 3 |
| 2.4 Topography and Surface Water Characteristics | 4 |
| 2.4.1 Topography | 4 |
| 2.4.2 Surface Water Characteristics | 4 |
| 2.5 Geological Characterization | 4 |
| 2.5.1 Surface Features | 4 |
| 2.5.2 Subsurface Features | 4 |
| 2.6 Hydrogeologic Characterization..... | 5 |
| 2.6.1 Surface Water..... | 5 |
| 2.6.2 Groundwater..... | 5 |
| 3.0 USER-PROVIDED INFORMATION..... | 5 |
| 3.1 Environmental Liens or Activity and Use Limitations..... | 5 |
| 3.2 User Questionnaire | 5 |
| 3.3 Specialized Knowledge | 6 |
| 3.4 Commonly Known or Reasonably Ascertainable Information | 6 |
| 3.5 Valuation Reduction for Environmental Issues..... | 7 |
| 3.6 Owner, Property Manager, and Occupant Information | 7 |
| 3.7 Reason for Performing Phase I..... | 7 |

3.8 Other 7

4.0 SITE HISTORY 8

4.1 History of Property Use 8

4.2 Historical Records Review 9

4.2.1 Historical City Directories..... 9

4.2.2 Historical Aerial Photographs 9

4.2.3 Historical Topographic Maps 10

4.2.4 Historical Sanborn Maps 11

4.3 Agency File Review..... 11

4.3.1 Department of Toxic Substances Control (DTSC)..... 11

4.3.2 Los Angeles Department of Public Works (LADPW) 11

4.3.3 Regional Water Quality Control Board (RWQCB)..... 11

4.3.4 Los Angeles Health Department, Public Health Investigation (PHI)..... 11

4.3.5 Torrance Fire Department, Fire Prevention, Hazardous Materials
Management 11

4.3.6 Torrance Building & Safety Department 12

4.3.7 California Division of Oil, Gas and Geothermal Resources 12

4.4 Summary of Historical Information..... 12

5.0 Records Review 12

6.1 Published Government List Review 12

6.1.1 Federal Environmental Record Sources 14

6.1.2 State Environmental Record Sources 16

6.2 Additional Environmental Record Sources 18

6.0 Site Reconnaissance..... 20

6.1 Methodology and Limiting Conditions..... 20

6.2 General Site Conditions 20

6.2.1 Exterior Observations..... 20

6.2.2 Interior Observations 21

6.2.3 Hazardous Substances and Petroleum Products in Connection with
Identified Uses..... 22

6.2.4 Storage Tanks 23

| | | |
|--------|---|----|
| 6.2.5 | Odors | 23 |
| 6.2.6 | Pools of Liquid | 23 |
| 6.2.7 | Drums | 23 |
| 6.2.8 | Hazardous Substances and Petroleum Product Containers (Not Necessarily in Connection with Identified Uses) | 23 |
| 6.2.9 | Unidentified Substance Containers | 23 |
| 6.2.10 | PCBs | 23 |
| 6.2.11 | Pits, Ponds or Lagoons | 24 |
| 6.2.12 | Stained Soil or Pavement | 24 |
| 6.2.13 | Stressed Vegetation | 24 |
| 6.2.14 | Solid Waste | 24 |
| 6.2.15 | Wastewater | 24 |
| 6.2.16 | Wells | 25 |
| 6.2.17 | Septic Systems | 25 |
| 6.2.18 | Heating/Cooling | 25 |
| 6.2.19 | Stains or Corrosion | 25 |
| 6.2.20 | Drains and Sumps | 25 |
| 6.2.21 | Water Intrusion | 25 |
| 6.2.22 | Asbestos-Containing Materials (ACMs) | 25 |
| 6.2.23 | Lead-Based Paint (LBP) | 26 |
| 6.2.24 | Current Uses of Adjoining Properties | 26 |
| 7.0 | INTERVIEWS | 26 |
| 7.1 | Interviews with Site Contacts | 26 |
| 7.2 | Interviews with Local Government Officials | 26 |
| 8.0 | FINDINGS | 26 |
| 8.1 | Known or Suspect Recognized Environmental Conditions (RECs) | 27 |
| 8.2 | Historical RECs | 27 |
| 8.3 | De Minimis Conditions | 27 |
| 9.0 | OPINION | 27 |
| 10.0 | CONCLUSIONS | 27 |

11.0 DEVIATIONS/DATA GAPS28

12.0 ADDITIONAL SERVICES28

13.0 REFERENCES28

14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS30

FIGURES

- 1 Site Vicinity Map
- 2 Site Plan

APPENDICES

- A Site Photographs
- B Historical Research Documentation
- C Regulatory Records Documentation
- D Supporting Documentation
- E Qualifications of Environmental Professionals
- F Interview Documentation

1.0 INTRODUCTION

LFR Inc. (LFR) has prepared this Phase I Environmental Site Assessment (ESA) for Torrance Commerce Center II located at 2271-2341 W. 205th Street in Torrance, Los Angeles County, California (“the Site”). The 6.25-acre parcel is improved with six multi-tenant commercial buildings totaling 111,981 square feet of space. This Phase I ESA was conducted on behalf of The Koll Company (Koll).

1.1 Objective

Koll requested that LFR conduct a Phase I ESA of the Site. The objective of the ESA is to evaluate the potential for there to be environmental contamination present on the subject property, or whether such contamination could potentially occur in the future because of activities or conditions on or near the property. The Phase I ESA was conducted in accordance with the processes prescribed in the American Society for Testing and Materials’ (ASTM) Practice E 1527-05. The term *recognized environmental conditions* as defined by ASTM is the presence or likely presence of any *hazardous substances* or *petroleum products* on a *property* under conditions that indicate an existing release, a past release or the material threat of a release of any *hazardous substances* or *petroleum products* into structures on the *property* or into the ground, groundwater or surface water of the property. The term includes *hazardous substances* or *petroleum products* even under conditions in compliance with laws. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

This Phase I ESA includes information gathered from federal, state, and local agencies; personal interviews with people familiar with the Site and surrounding properties; and a site visit conducted by LFR representatives. The report is intended to meet the requirements of ASTM Practice E 1527-05.

1.2 Detailed Scope of Services

The Phase I ESA conducted by LFR included, but was not limited to, the following services:

- a reconnaissance-level site visit to look for evidence of the release(s) of hazardous materials and petroleum products and to assess the potential for on-site releases of hazardous materials and petroleum products
- drive-by observations of adjacent properties and the site vicinity
- interviews with people familiar with the Site
- review of regulatory agency files
- review of historical documents

- preparation of a report presenting our findings, including a summary of conclusions

1.3 Significant Assumptions

The purpose of this Phase I ESA is to provide appropriate inquiry into the previous ownership and use of the Site consistent with good commercial and customary practice in an effort to minimize liability. LFR also assumes that the information provided by the Client, regulatory database provider, and regulatory agencies is true and reliable.

1.4 Limitations and Exceptions

This document was prepared for the sole use of Koll and their successors and assignees, and may be relied upon by such parties. No other party should rely on the information contained herein without the prior written consent of LFR and Koll.

The opinions and recommendations presented in this report are based upon the scope of services, information obtained through the performance of the services, and the schedule as agreed upon by LFR and the original party for whom this report was originally prepared. This report is an instrument of professional service and was prepared in accordance with the generally accepted standards and level of skill and care under similar conditions and circumstances established by the environmental consulting industry. To the extent that LFR relied upon any information prepared by other parties not under contract to LFR, LFR makes no representation as to the accuracy or completeness of such information. Only the party for whom this report was originally prepared, and other specifically named parties, may make use of and rely upon the information in this report, in its entirety, for a period not to exceed 180 days in accordance with the American Society for Testing and Materials' (ASTM's) "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" ASTM Designation E 1527-00 dated May 10, 2000, ASTM's "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" ASTM Designation E 1527-05 dated November 1, 2005, and/or the Code of Federal Regulations (CFR) 40CFR Part 312 "Standards and Practices for All Appropriate Inquiries: Final Rule" dated November 1, 2005. After 180 days and prior to using the information contained herein, the report should be updated in accordance with ASTM Standards and Federal regulations.

The findings presented in this report apply solely to site conditions existing at the time when LFR's assessment was performed. It must be recognized, however, that an Environmental Site Assessment ("ESA") is intended for the purpose of evaluating the potential for contamination through limited research and investigative activities and in no way represents a conclusive or complete site characterization. Conditions in other parts of the project site may vary from those at the locations where data were collected. LFR's ability to interpret investigation results is related to the availability of the data and the extent of the investigation activities. As such, 100% confidence in ESA conclusions cannot reasonably be achieved.

LFR, therefore, does not provide any guarantees, certifications, or warranties (express or implied) that a property is free from environmental contamination. Furthermore, nothing contained in this document shall relieve any other party of its responsibility to abide by contract documents and all applicable laws, codes, regulations, or standards.

1.5 Special Terms and Conditions

The scope of work for this Phase I ESA did not include testing of electrical equipment for the potential presence of polychlorinated biphenyls (PCBs) or the assessment of natural hazards such as naturally occurring asbestos, radon gas or methane gas, assessment of the potential presence of radionuclides, or assessment of non-chemical hazards such as the potential for damage from earthquakes or floods. This Phase I ESA also did not include an extensive assessment of the environmental compliance status of the Site or of the businesses operating at the Site, a health-based risk assessment or an assessment for the potential for vapor intrusion.

2.0 SITE OVERVIEW

2.1 Site Location and Description

The rectangular-shaped Site is located at the northwest corner of the intersection of W. 205th Street and Amapola Avenue. The six on-site buildings are identified as 2271, 2281, 2291, 2301, 2311, and 2341 W. 205th Street. The Los Angeles County Assessor's Parcel Numbers (APNs) associated with the Site are 7352-018-004 and 7352-018-066. Ownership of the Site is vested in AMB Property L.P.

2.2 Site and Vicinity General Characteristics

The Site Vicinity Map and Site Map with adjacent properties are presented as Figures 1 and 2, respectively. The Site vicinity is comprised of residential, commercial and industrial properties. A Mobil Oil Refinery and associated oil storage tanks are located within 0.5 mile north and northwest of the Site. The 405 Freeway is located approximately 1.0 mile north of the Site. The Pacific Ocean is located approximately 4.0 miles west of the Site.

2.3 Site Improvements

The Site is improved with three 1-story and three 2-story office/warehouse buildings without basements. Landscaping is present throughout the Site and asphalt-paved parking lots and driveways comprise the remainder of the Site. The Site buildings were constructed in 1985. Currently, there are 47 occupied units and five vacant units on site. Tenant uses include light assembly, warehousing, research and development, and general office.

2.4 Topography and Surface Water Characteristics

2.4.1 Topography

According to the United States Geological Survey (USGS) 7.5-Minute Series Topographic Map of the Torrance, California, Quadrangle (1981), the Site is located at an elevation of approximately 73 feet above mean sea level. The Site area slopes gently towards the northeast.

2.4.2 Surface Water Characteristics

A walk-through Site inspection did not reveal conditions such as standing water that would indicate the presence of a wetland on the Site. According to the USGS topographic map for the Torrance, California quadrangle, the Site is not listed as a designated wetland. In addition, the database report provided by Environmental Data Resources, Inc. (EDR) did not list any wetlands on or adjacent to the Site.

2.5 Geological Characterization

2.5.1 Surface Features

The Site is covered by the building footprints, asphalt-paved parking and driveways, and landscaping. There are no areas of exposed native soil.

2.5.2 Subsurface Features

According to an environmental database report prepared by Environmental Data Resources, Inc. (EDR), the geology of the Site is identified as part of the Quaternary Series of the Quaternary System of the Cenozoic Era. According to the United States Department of Agriculture (USDA) Soil Conservation Service (SCS), the subject property is underlain by the Urban Land soil component. Although the Urban Land component is not well defined, surficial soil types include sandy loam, gravelly-sandy loam, silt loam, clay, fine sand, gravelly-sand, and sands.

It should be noted that LFR has not drilled or sampled soil borings at the Site, and the regional geologic conditions described herein are based solely upon available literature regarding the area.

2.6 Hydrogeologic Characterization

2.6.1 Surface Water

No surface water was observed at the Site. Stormwater runoff from the Site is expected to flow into landscaped areas, stormdrains and onto adjacent streets.

2.6.2 Groundwater

According to information provided in the EDR report, depth to groundwater at a USGS well approximately 0.25 mile southwest of the Site ranges from 85 to 90 feet below ground surface (bgs). This depth to groundwater was confirmed in remedial reports reviewed for nearby properties which indicated depths to groundwater of 80 to 90 feet bgs. Based on regional topography, the general groundwater gradient in the area of the Site is expected to be towards the west-southwest or towards the Pacific Ocean. However, the Department of Toxic Substances Control (DTSC) reports the groundwater gradient to flow to the east in proximity to the Site.

3.0 USER-PROVIDED INFORMATION

LFR submitted a copy of the ASTM-05 User Questionnaire to AMB, the owner of the Site. Ms. Alicia Light, AMB Senior Property Manager, completed the questionnaire. In addition, Koll completed a copy of the questionnaire as the user of the report. However, the responses were all unknown at this time. See Appendix D for a copy of the questionnaires.

3.1 Environmental Liens or Activity and Use Limitations

According to environmental lien databases provided in the EDR report, the Site is not encumbered by an environmental lien or activity and use limitation. In addition, LFR reviewed a Commitment for Title Insurance report prepared for the Site and provided by Koll. According to the document, there are no environmental liens or activity and use limitations recorded for the Site. There are several recorded easements for public utilities.

3.2 User Questionnaire

The Owner was asked the following questions as part of the assessment:

- Are they aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state, or local law? **Answer:** No.
- Are they aware of any activity or land use limitations, such as engineering controls, land use restrictions, or institutional controls, that are in place at the Site and/or have been filed or recorded in a registry under federal, tribal, state, or local law? **Answer:** Unknown.

3.3 Specialized Knowledge

The Owner was asked the following questions as part of the assessment:

- Do they have any specialized knowledge or experience related to the property or nearby properties? For example, are they involved in the same line of business as the current or former occupants of the property or an adjoining property so that they would have specialized knowledge of the chemicals and processes used by this type of business? **Answer:** No.
- Are they aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example, as User,
 - Do they know the past uses of the property? **Answer:** Yes, but not prior to 1985.
 - Do they know of specific chemicals that are present or once were present at the property? **Answer:** No.
 - Do they know of spills or other chemical releases that have taken place at the property? **Answer:** No.
 - Do they know of any environmental cleanups that have taken place at the property? **Answer:** No.
 - Do they know if any fill material has been imported to the Site? **Answer:** Unknown.
 - Do they know of any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property? **Answer:** No.
 - Do they know of any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the property? **Answer:** No.
 - Do they know of any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products? **Answer:** No.

3.4 Commonly Known or Reasonably Ascertainable Information

The Owner was asked the following question as part of the assessment:

- Based on their knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property? **Answer:** No.

3.5 Valuation Reduction for Environmental Issues

The Owner was asked the following question as part of the assessment:

Based on their knowledge and experience related to the property, do they believe that the value of the Site that was or is being paid for this property reasonably reflects the fair market value of the property? If they conclude that there is a difference, have they

considered whether the lower purchase price is because contamination is known or believed to be present at the property? **Answer:** Unknown.

3.6 Owner, Property Manager, and Occupant Information

The Site is owned by AMB Property L.P., and occupied by over 40 tenants. A complete tenant list is provided in Appendix D. LFR interviewed Ms. Alicia Light, Senior Property Manager with AMB Property Corporation, for information regarding the Site. According to Ms. Light, there are no environmental concerns associated with the Site.

3.7 Reason for Performing Phase I

The reason for performing this Phase I ESA was to evaluate the Site for the presence of environmental concerns in preparation for a property transfer.

3.8 Other

LFR was provided with a copy of the Offering Memorandum for the Site. In addition, LFR was provided with the following prior environmental reports for the Site:

Versar Inc., 1998. *Phase I Environmental Site Assessment, Torrance Commerce Center II, Torrance, CA*. July 13.

Site use was similar to current conditions during Versar's 1998 investigation. A complete tenant list was provided that indicates similar types of tenant uses although the majority of tenants were different from those that currently occupy the Site. Versar's report references two previous reports conducted by AIG Consultants, Inc. (AIG) in 1993 – a Phase I ESA and a subsequent Phase II Subsurface Investigation report. AIG's report reportedly stated that since the Site was historically part of an industrial facility to the west and south, soil sampling was warranted. AIG then drilled six soil borings along the southern and northern property boundary to 10 feet bgs. No groundwater was detected. Collected soil samples were analyzed for volatile organic compounds (VOCs) and metals. No VOCs were detected and only background concentrations of metals were detected. AIG's Phase II report concluded that no further investigation of the property was warranted. Based on Versar's site and regulatory agency investigations, Versar also concluded that there was no confirmed contamination at the Site. However, they did recommend, based on the heavy industrial use of the surrounding area, that annual agency evaluations of off-site properties of potential concern be conducted to ensure that any new releases were not impacting the Site.

Although LFR was not provided with a copy of the 1993 AIG Phase II report, it is reasonable to assume that the interpretation of the data is correct based on the fact that both companies (Versar and AIG) are reputable companies. See Appendix D for a copy of the Versar report (text only).

URS. 2008. *Environmental Summary and Update, AMB Torrance Commerce Center II, Torrance, CA*. November 20.

This letter report is a brief update to the Phase I ESA report prepared by Versar in 1998. URS summarized the findings of the Versar report and concluded, based on their own site inspection, that site conditions remained generally the same as those reported by Versar. No environmental concerns were noted. The URS update report did not include agency investigation or research into suspected off-site sources of concern. URS concluded the update report as follows, “URS did not identify environmental concerns for the subject property and no follow up actions are recommended.” See Appendix D for a copy of this report.

4.0 SITE HISTORY

4.1 History of Property Use

LFR reviewed the historic usage of the Site and adjacent properties to assess whether prior owners of the Site or adjacent properties may have conducted activities that could pose environmental concerns to the Site. LFR’s research included conducting personal interviews with people familiar with the Site and reviewing local agency records, historical aerial photographs, historical city directories, historical Sanborn Fire Insurance Maps (Sanborn maps), and historical topographic maps associated with the Site. LFR’s sources of information included the following:

- EDR provided a historical street address report. A copy of the City Directory Abstract is included in Appendix B.
- Black-and-white aerial photographs dated 1928, 1947, 1956, 1965, 1976, 1989, 1994, 2002, and 2005 were reviewed. Copies of these aerial photographs are provided in Appendix B.
- Sanborn maps were not found for the Site and vicinity. A copy of the search letter is included in Appendix B.
- Historical USGS topographic maps dated 1896, 1924, 1934, 1948, 1951, and 1964 (photorevised in 1972 and 1981) of the Torrance and Redondo, California quadrangles, 6-, 7.5- and 15-Minute Series, were reviewed. Copies of these topographic maps are included in Appendix B.

4.2 Historical Records Review

The following sections present the results of LFR’s historical records review including city directories, aerial photographs, topographic maps, and Sanborn maps pertaining to the Site.

4.2.1 Historical City Directories

LFR reviewed a historical city directory abstract provided by EDR spanning the years from 1920 to 2006 in approximate five-year intervals. The Site addresses were not listed until 1990. A variety of commercial tenants were listed at all six Site addresses through 2001. There were no listings for the Site after 2001. No tenant names that indicated an obvious environmental concern for the Site were listed. Off-site occupants listed included private individuals as far back as 1931 and changing to names of commercial businesses by the mid-1980s.

No environmental concerns to the Site were identified from on-site or off-site tenant names listed in the city directory abstract.

4.2.2 Historical Aerial Photographs

LFR reviewed historical aerial photographs of the Site and vicinity for the years 1928, 1947, 1956, 1965, 1976, 1989, 1994, 2002, and 2005. These low-altitude, black-and-white photographs were reviewed to identify former land use on and in the vicinity of the Site. Brief descriptions of the Site and vicinity, as observed in the aerial photographs, are presented below.

1928, 1947

The 1928 photograph depicts the Site in agricultural use as is the immediate surrounding area. A tank farm is visible approximately 0.25 mile north of the Site and what appear to be factory buildings are visible approximately 0.25 mile south of the Site. Railroad tracks, streets and residential development are also visible further south beyond the factory buildings. In the 1947 photograph, the Site and adjacent properties now appear fallow and are no longer used for agriculture. The surrounding area appears similar to the 1928 photograph with the exception of dense residential development now visible over one mile south of the Site.

1956, 1965, 1976

In the 1956 through 1976 photographs, the Site appears to be used for vehicle parking for a new factory building located to the south and west of the Site. This factory was identified through other sources as American Standard, a manufacturer of kitchen and bathroom porcelain products. The factory further to the south is identified on topographic maps from the same time period as Pacific Electric Car Shops (which eventually became Reynolds Metals and now Ball Can Co.). Land adjacent to the west and east of the Site is vacant, and residential development and Del Amo Boulevard are present north of the Site. The tank farm to the north beyond the residences now includes a large reservoir-type area.

1989, 1994, 2002, 2005

In the 1989 through 2005 photographs, the Site is developed in its current configuration. The Site is surrounded by similar types of commercial buildings to the east, west and south. The large factory complex previously present to the west and south of the Site no longer exists. Private residences and Del Amo Boulevard are depicted north of the Site beyond which is the tank farm. The reservoir area previously associated with the tank farm appears to have been converted to another use (dry, unpaved land with an additional tank and a long, rectangular structure).

No environmental concerns were readily apparent on the Site through the review of aerial photographs. Based on the current commercial use of the Site, the past agricultural activity at the Site (identified only on the 1928 photograph) does not represent a current environmental concern for the Site.

4.2.3 Historical Topographic Maps

Historical USGS topographic maps dated 1896, 1924, 1934, 1948, 1951, and 1964 (photorevised in 1972 and 1981) of the Torrance and Redondo, California quadrangles, 6-, 7.5- and 15-Minute Series, were reviewed and are discussed below.

The 1896 map depicts the Site and surrounding area as undeveloped land. A slough is depicted to the east of the Site and the city of Redondo and the Pacific Ocean are visible further to the west of the Site. The 1924 map depicts the Site as vacant although the city of Torrance is now depicted to the south of the Site. Del Amo Boulevard is visible to the north of the Site, vacant land is present to the east and west, and buildings and railroad spurs are visible south of the Site (identified as Pacific Electric Car Shops). The Site remains vacant on the 1934 and 1948 maps. The surrounding area remains in a similar configuration to the earlier maps with the exception of a General Petroleum Tank Farm located to the north of the Site across Del Amo Boulevard. The Site is vacant on the 1951 map; however, a large building (the American Standard facility) now abuts the southern boundary of the Site and private

residences are depicted to the north of the Site along both sides of Del Amo Boulevard. Oil tanks and reservoirs are depicted further north of the Site and an oil refinery is depicted to the northwest. The greater surrounding area is developed with industrial properties (steel mills, iron works) and oil-field related features. Residential development is visible further south of the Site. The Site remains vacant on the 1964, 1972 and 1981 maps. Other than increased urban development, the features in the surrounding area remain similar to the 1951 map.

No features were depicted on the Site on the topographic maps reviewed that would present an environmental concern for the Site.

4.2.4 Historical Sanborn Maps

LFR requested that EDR perform a search of available Sanborn maps for the Site. No Sanborn maps were found for the Site and vicinity.

4.3 Agency File Review

4.3.1 Department of Toxic Substances Control (DTSC)

According to a review of the DTSC's website <http://www.envirostor.dtsc.ca.gov/public/>, there are no records for the Site addresses.

4.3.2 Los Angeles Department of Public Works (LADPW)

According to counter personnel at the LADPW, the LADPW does not have jurisdiction over the city of Torrance. All relevant files would be at the Torrance Fire Department.

4.3.3 Regional Water Quality Control Board (RWQCB)

According to a review of the Los Angeles RWQCB's website <http://geotracker.swrcb.ca.gov/search.asp>, there are no records for the Site addresses.

4.3.4 Los Angeles Health Department, Public Health Investigation (PHI)

According to a written response from the PHI, there are no files for the Site addresses.

4.3.5 Torrance Fire Department, Fire Prevention, Hazardous Materials Management

LFR requested files from the Torrance Fire Department for the Site addresses. According to Ms. Sue Herber, City Clerk, there are no records for the Site addresses

for underground storage tanks or hazardous materials. Ms. Herber stated that there are records for annual Fire Department inspections; however, these are not related to hazardous materials. Therefore, LFR did not review files at the Torrance Fire Department.

4.3.6 Torrance Building & Safety Department

LFR reviewed records for the Site addresses at the Torrance Building & Safety Department. The permit copies are maintained on microfiche and were difficult to read. However, the majority of permits appeared to be dated 1985 through 1987 and related to

construction of the buildings. Certificates of Occupancy listed building use as ‘office warehouse’. The owner of the Site in 1985, the date the buildings were constructed, was listed as Don Wilson Development. A more recent permit for the 2341 W. 205th Street building was reviewed that indicated that the roof was replaced in May 2001 with a “built up” type roof. There were no permits on file that indicated an environmental concern for the Site.

4.3.7 California Division of Oil, Gas and Geothermal Resources

LFR reviewed readily available and pertinent oil and gas field maps from the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR). According to Field Map 126, *Gaffey, Torrance, W. Portion Wilmington*, 2003, there are no oil wells on or adjacent to the Site. The Site is located approximately 1.5 miles east of the Torrance Oil Field.

4.4 Summary of Historical Information

Based on LFR’s historical research, the Site was agricultural land on a 1928 aerial photograph. From approximately 1956 to at least 1976, the Site appeared to have been used by the American Standard factory for vehicle parking. There did not appear to be any structures or other uses of the Site until construction of the current improvements in 1985. LFR’s historical research of the Site did not identify past uses of the Site that would indicate a current environmental concern. Development of the surrounding area has included oil tank farms, an oil refinery, factories, and other industrial uses.

5.0 RECORDS REVIEW

6.1 Published Government List Review

Regulatory agency database information was obtained from the EDR Radius Map Report, which maps and lists properties in U.S. government and California state environmental databases with existing conditions or status that may have the potential to impact the Site. The EDR report is provided as Appendix C.

None of the Site addresses are listed in the databases provided in the EDR report.

The Site is located in an industrial area of Torrance that has included chemical plants, aerospace manufacturers, and an oil refinery. Many of the industrial properties have been investigated by several state and federal agencies with remediation and reuse of many properties occurring over time. Records on file at the DTSC indicate that a water well maintained by the Southern California Water Replenishment District and known as PM 3 (Madrid) is located approximately 1,000 feet south-southwest of the Site. This well is reportedly contaminated with 1,1-dichloroethylene (1,1-DCE) above the California Maximum Contaminant Level (MCL) of 6.0 micrograms per liter (µg/l). LFR contacted

Mr. Greg Holmes, Unit Chief with the DTSC, who stated that 1,1-DCE has been detected in this well at a level of 85 ug/l at a depth between 145-185 feet bgs. Mr. Holmes stated that the DTSC was contracted by the EPA to find the source of the contamination. The DTSC originally looked at a Ball Can facility (formerly Reynolds Metals Company) to the south of the Site as well as a PPG Industries (PPG) facility to the southwest of the Site, and neither facility appeared to be a source of solvent contamination. Mr. Holmes stated that eventually a facility known as Vought, beyond the PPG facility and over 0.5 mile southwest of the Site, was identified as the potential source although no further investigation into Vought has occurred at this time. LFR also asked Mr. Holmes if a former Dow Chemical facility, located approximately 0.25 mile west of the Site at its closest point and hydraulically upgradient from the Site, could be the source of the contamination. Mr. Holmes stated that it was possible although regulatory responsibility for that Site had shifted to the EPA. LFR researched Dow Chemical on the EPA website but was unable to determine the type and extent of groundwater contamination, if any, at this facility. The RWQCB lists the Dow Chemical facility as a “case closed” facility with regard to leaking underground storage tanks.

LFR asked Mr. Holmes whether he thought groundwater contamination extended to the north of the PM 3 well as far as the location of the Site. Mr. Holmes declined to speculate as the DTSC has not conducted groundwater sampling in the area of the Site nor have they identified a source of solvent contamination in proximity to the Site. LFR further questioned Mr. Holmes if the DTSC was concerned about vapor intrusion to businesses in proximity to the PM 3 well. He stated that based on the depth that the contaminant was identified, and the fact that contamination exceeding MCLs was not identified in shallower aquifers, vapor intrusion was not a current concern for the DTSC. Based on the past and current uses of the Site, the Site does not appear to have contributed to any nearby groundwater contamination nor has it been suspected of contributing by regulatory agencies. In conclusion, based on the industrial nature of the area and the fact that groundwater contamination has been identified within 1,000 feet of the Site, it is possible contaminated groundwater underlies the Site at a depth greater than 145 feet bgs. According to the DTSC, this information does not indicate a concern for vapor intrusion. In addition, Mr. Holmes stated that unless the Site was identified as a principal responsible party (PRP), the DTSC would not require the Site owner to remediate groundwater associated with that contamination in the event contaminated groundwater underlies the Site. See Appendix D for a copy of a map depicting the location of the PM 3 well in relation to the Site.

Ms. Stephanie Gentry, LFR Senior Toxicologist, evaluated the information obtained from the DTSC and stated that a human health risk assessment was not applicable as 1,1-DCE is not a carcinogen. Ms. Gentry calculated the Hazard Index (a calculation used for non-carcinogens) for 1,1-DCE in the event it underlies the Site at the level detected in well PM 3, and found it be less than 1.0, which indicates minimal risk for a non-carcinogen. The Hazard Index for the Site was computed to be 0.035. Therefore, it does not appear that the Site would be affected by the nearby 1,1-DCE groundwater contamination.

The groundwater gradient in the area of the Site is reported by the DTSC to flow to the east; however, there is influence from pumping activities conducted at the Mobil refinery northwest of the Site.

6.1.1 Federal Environmental Record Sources

ASTM E 1527-05 guidance requires review of the following federal databases.

6.1.1.1 National Priorities List (1.0 mile)

The National Priorities List (NPL) is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund program. An NPL site must meet or surpass a predetermined hazard ranking system score, be chosen as a state's top priority site, or meet three specific criteria set jointly by the U.S. Department of Health and Human Services and the U.S. EPA. Source: U.S. EPA.

No properties listed on the NPL database are located within 1.0 mile of the Site

6.1.1.2 Delisted NPL Site List (1.0 mile)

The Delisted NPL Site List includes properties that have been removed from the NPL.

No properties listed on the Delisted NPL database are located within 1.0 mile of the Site.

6.1.1.3 Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS; 0.5 mile)

CERCLIS contains data on potentially hazardous waste sites that have been reported to the U.S. EPA by states, municipalities, private companies, and private persons pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The CERCLIS List includes sites that are either proposed for the NPL or in the screening and assessment phase for possible inclusion on the NPL. Source: U.S. EPA/National Technical Information Service (NTIS).

No properties listed on the CERCLIS database are located within 0.5 mile of the Site.

6.1.1.4 CERCLIS-No Further Remedial Action Planned (CERCLIS-NFRAP; 0.5 mile)

CERCLIS-NFRAP contains data on sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. Source: U.S. EPA/National Technical Information Service (NTIS).

Seven properties are listed on the CERCLIS-NFRAP database within 0.5 mile of the Site. However, based on their NFRAP status, they are not considered a current concern to the Site.

6.1.1.5 Corrective Action Report (CORRACTS; 1.0 mile)

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity. Source: U.S. EPA.

Nine properties are listed on the CORRACTS database within 1.0 mile of the Site; however, all of the facilities are located over 0.25 mile from the Site and in generally cross- to downgradient locations with respect to groundwater flow. Therefore, based on distance, location, and depth to area groundwater, it is unlikely that the CORRACTS facilities represent an immediate environmental concern to the Site.

6.1.1.6 RCRA Treatment, Storage, and Disposal (TSD) Facilities (0.5 mile)

RCRA TSD Facilities includes selected information on facilities that generate, transport, store, treat and/or dispose of hazardous waste, as defined by the Resource Conservation and Recovery Act (RCRA). Source: U.S. EPA/NTIS.

Five TSD properties are listed within 0.5 mile of the Site. However, all five are located over 0.25 mile from the Site in hydraulically cross- to downgradient locations. Therefore, they do not appear to represent an environmental concern to the Site.

6.1.1.7 RCRA Generators Lists (Site and Adjoining Properties)

RCRA large-quantity generators (LQG) are those facilities that generate at least 1,000 kilograms per month (kg/month) of non-acutely hazardous waste or meet other applicable RCRA requirements. RCRIS small-quantity generators (SQG) generate less than 1,000 kg/month of non-acutely hazardous waste or meet other applicable RCRA requirements.

One property listed on the RCRA-LQG database is located adjacent to the Site, as follows:

Phenomenex, Inc. at 2320 W. 205th Street is located across W. 205th Street to the south of the Site. Waste types generated include unspecified solvent mixture waste, oxygenated solvents, liquids with pH <2, universal waste, and ignitable hazardous wastes. The facility has received violations that appear to be mostly administrative in nature. LFR's curbside inspection of this facility did not identify environmental concerns that would impact the Site.

There are no properties listed on the RCRA-SQG database located adjacent to the Site.

6.1.1.8 Federal Institutional Control/Engineering Control Registries (0.5 mile)

Federal institutional control and engineering control registries were requested in the database search.

The Site is not identified on the registries searched by EDR.

6.1.1.9 Emergency Response Notification System (ERNS; Site Only)

ERNS is a national database that records and stores information on reported releases of oil and hazardous substances. The database contains information on spill reports made to federal authorities including the U.S. EPA, U.S. Coast Guard, National Response Center, and Department of Transportation.

The Site is not listed on the ERNS database.

6.1.2 State Environmental Record Sources

ASTM E 1527-05 requires review of the following state databases.

6.1.2.1 Historical Cal-Sites (Cal-Sites; 1.0 mile)

The Cal-Sites database contains potential or confirmed hazardous substance release properties. This database is no longer updated and has been replaced by ENVIROSTOR.

There are no Historical Cal-Sites within 1.0 mile of the Site.

6.1.2.2 ENVIROSTOR (ENVIROSTOR; 1.0 mile)

The Envirostor database maintained by the Department of Toxic Substances Control (DTSC) identifies sites that have known contamination or sites for which there may be a reason to investigate. The Envirostor database provides similar information that was available in Cal-Sites.

There are 11 Envirostor listings within 1.0 mile of the Site, only two of which are located less than 0.25 mile from the Site. These two facilities are identified as follows:

Phenomenex, Inc. (Building 4) at 431 Amapola Avenue is located approximately 1/8 mile southeast of the Site. This facility is listed as currently in business with a site screening completed in 2007. No other information was provided in the EDR report; therefore, LFR researched this facility on the DTSC website. According to a report posted on-line, this facility was identified through a windshield investigation as a suspected source of solvent groundwater contamination. However, additional non-invasive investigation indicated the facility was not likely a contributor and no further work or sampling was recommended. The report also stated that the Phenomenex facility

located across the street from the Site at 2320 W. 205th Street was also not likely a contributor to regional contamination.

American Standard, Inc. at 360 Crenshaw Boulevard was formerly located approximately 0.25 mile west of the Site according to the street address. The 300 block of Crenshaw Boulevard is currently developed with multi-tenant office buildings. The database lists the facility as a historical site, and the Envirostor website indicates that the DTSC issued a No Further Action (NFA) status for the facility in 1995. Therefore, it does not appear that this former property represents a current environmental concern for the Site. It should be noted that this facility encompassed a large factory building whose eastern end abutted the southern boundary of the Site. According to aerial photographs, it also appears that American Standard used a portion of the Site for vehicle parking. Based on these observations, as discussed in Section 3.8, AIG conducted soil sampling on site to evaluate if the adjacent occupancy of American Standard had impacted the Site. No contaminants of concern were detected in the collected soil samples, and no further investigation was recommended.

6.1.2.3 Bond Expenditure Plan (BEP; 1.0 mile)

The Department of Health Services developed a site-specific expenditure plan as the basis for an appropriation of Hazardous Substance Cleanup Bond Act funds. It is not updated.

No properties listed on the BEP database are located within 1.0 mile of the Site.

6.1.2.4 State and Tribal-Equivalent SWF/LF, State Landfill (SWIS; 0.5 mile)

This database is an inventory of solid waste disposal facilities or landfills. These may be active or inactive facilities or open dumps that failed to meet RCRA Section 2004 criteria for solid waste landfills or disposal sites.

There are no listed SWIS properties within a 0.5 mile radius of the Site.

6.1.2.5 Waste Management Unit Database System (WMUDS/SWAT, 0.5 mile)

This system is used by the SWRCB for tracking and inventory of waste management units. WMUDS comprises the following databases: facility information, scheduled inspections information, waste management unit information, Solid Waste Assessment Test (SWAT) program information, SWAT report summary information, SWAT report summary data, Chapter 15 information and monitoring parameters, TPCA program information, RCRA program information, closure information, and interested parties information. Source: SWRCB.

There is one listed SWAT property within a 0.5 mile radius of the Site, which is the American Standard facility discussed above. The database does not provide any information other than indicating the facility had a disposal site. However, since this

facility no longer exists and has a current NFA status, it does not appear to represent an environmental concern to the Site. In addition, aerial photographs do not indicate that a disposal site was located in proximity to the Site.

6.1.2.6 State and Tribal Leaking Underground Storage Tank Database (LUST; 0.5 mile)

The LUST database is a list of reported leaking UST incidents.

There are seven LUST facilities, two with the same address, listed within a 0.5-mile radius of the Site. Five of the listings have a current status of “case closed.” One of the two listed open cases, PPG Industries at 465 Crenshaw Boulevard, also has a “case closed” status as of November 18, 2008, according to the Regional Water Quality Control Board’s (RWQCB) Geotracker™ website. The other open case, FHL Group at 2027 Harpers Way, is located approximately 0.5 mile to the southeast of the Site. According to Geotracker™, the leak at this facility was discovered in 1965. As of 1996, the facility had a status of “open – site assessment.” There has been no further action since that time. Therefore, based on distance, hydraulically downgradient location and regulatory inactivity, this facility is not anticipated to impact the Site.

6.1.2.7 State and Tribal Registered Underground Storage Tank (UST; Site and Adjoining Properties)

There are no listed UST properties adjoining the Site.

6.2 Additional Environmental Record Sources

The following databases were also checked by EDR:

- CONSENT [EPA Regional Offices Superfund Consent Decrees (1 mile)]
- ROD [Records of Decision (1 mile)]
- FINDS [Facility Index System (target property)]
- HMIRS [Hazardous Materials Information Reporting Systems (target property)]
- MLTS [Material Licensing Tracking System (target property)]
- MINES [Mines Master Index Files (0.25 mile)]
- PADS [PCB Activity Database System (target property)]
- DOD [Department of Defense Site (1 mile)]
- RAATS [RCRA Administrative Action Tracking System (target property)]
- TRIS [Toxic Chemical Release Inventory System (target property)]
- TSCA [Toxic Substances Control Act (target property)]
- SSTS [Section 7 Tracking Systems (target property)]

- FTTS [FIFRA/TSCA Tracking System (target property)]
- AST [Aboveground Petroleum Storage Tank Facilities (target property)]
- CLEANERS [California DTSC Drycleaners (0.25 mile)]
- CA WDS [Waste Discharge System (target property)]
- DEED [List of Deed Restrictions (target property)]
- SCH [School Property Evaluation Program (0.25 mile)]
- EMI [Emissions Inventory Data (target property)]
- REF Unconfirmed Properties Referred to Another Agency (0.25 mile)]
- NFA [No Further Action Determination (0.25 mile)]
- NFE [Properties Needing Further Evaluation (0.25 mile)]
- CA SLIC [Spills, Leaks, Investigation & Cleanup Cost Recovery Listing (0.50 mile)]
- HAZNET [Hazardous Materials Database (target property)]
- COAL GAS [Manufactured Gas Plants (1.0 mile)]
- VCP [Voluntary Cleanup Program Properties (0.50 mile)]
- SWRCY [A listing of recycling facilities (0.5-mile)]
- Los Angeles County Site Mitigation (target property)
- Los Angeles County HMS (target property)

One facility was listed on the DTSC's Voluntary Cleanup Program (VCP) database. This facility, PPG Industries at 465 Crenshaw Boulevard, is listed as a former coatings manufacturer for industrial applications. The DTSC Envirostor database indicates that there is solvent and heavy metal contamination at this facility that is confined to the soil and remediation is in progress. Based on LFR's drive-by observation, this facility is no longer in existence. Based on the media impacted (soil only) and the distance from the site (0.5 mile), this former facility is not anticipated to impact the Site.

Another facility listed on several databases is the Exxon Mobil Refinery located over 0.5 mile northwest of the Site. In addition, large aboveground oil storage tanks associated with the refinery are located less than 0.5 mile north of the Site at their closest point. However, based on distance, hydraulic location relative to the Site and regulatory oversight, it does not appear that the refinery presents an immediate environmental concern to the Site.

No other properties were listed on the above databases within the specified search radius of the Site that would appear to represent an environmental concern to the Site. Additionally, no facilities listed in the Orphan Summary are anticipated to impact the Site.

6.0 SITE RECONNAISSANCE

On January 14, 2009, Ms. Janet Holtz, a representative of LFR, performed a reconnaissance-level assessment of the Site to observe general site conditions and indications of the possible release(s) of chemicals to the subsurface. A walkover site inspection was conducted to identify visible evidence of recognized environmental conditions. Ms. Holtz was accompanied by Ms. Kathy Ortiz, Property Assistant with AMB Property Corporation, during the Site inspection. Ms. Ortiz has been associated with the Site for two years. Photographs taken during LFR's site inspection are included in Appendix A.

6.1 Methodology and Limiting Conditions

LFR was provided full access to the Site. The methodology for the Site visit included walking and observing current Site conditions. There are 47 occupied tenant suites and five vacant suites on site. LFR inspected tenants that were identified by Ms. Light and Ms. Ortiz, Site Property Managers, as storing and/or using chemicals. In addition, representative office-use and warehouse-use type tenants were also inspected. In total, LFR inspected approximately 35% of the tenants on site. See Appendix D for a complete tenant list indicating those tenants inspected by LFR.

6.2 General Site Conditions

6.2.1 Exterior Observations

On the day of LFR's Site inspection, the rectangular-shaped Site was improved with six one- and two-story concrete tilt-up buildings evenly spaced throughout the property. Well-maintained landscaping is present throughout the Site and includes decorative walking and sitting areas between several of the buildings. Asphalt-paved parking lots and driveways with concrete swales comprise the remainder of the Site. Dumpster enclosures were observed at the rear of the Site.

During the inspection, no distressed vegetation, excessive surface staining, monitoring wells, sumps, clarifiers, or remediation systems were observed on the Site. In general, the property was well-maintained.

6.2.2 Interior Observations

The interiors of the occupied tenant spaces consisted of typical office improvements and warehouse storage areas. No chemicals, hazardous wastes or environmental concerns were identified in the tenant spaces that consisted of all office space or a majority of office space with a small warehouse.

The following tenants were observed to be using chemicals in their operations:

| TENANT NAME/LOCATION | MATERIALS STORED/USED ONSITE |
|--|---|
| <p style="text-align: center;">Phenomenex* 2311 W. 205th St., Suites 101, 102 & 201</p> | <p>Phenomenex is a manufacturer of chromatography columns; however, the majority of manufacturing operations are conducted at off-site facilities. In these suites, the majority of space is used for office purposes. In addition, LFR observed a small repair shop that contained two 1-gallon containers of thinner stored on a shelf, and a machine shop that contained four lathes, grinders and presses. The machine shop floor was clean with no evidence of oil staining and/or metal shavings. LFR observed one 5-gallon container of oil stored on the floor. According to a company representative, any used oil generated in the machine shop is transferred to one of their off-site facilities where regulated waste is picked up twice per week by Univar. There were no floor drains in the machine shop. LFR also observed five cylinders of compressed gases appropriately secured. No concerns were noted.</p> |
| <p style="text-align: center;">Phenomenex* 2341 W. 205th St., Suites 101 – 105</p> | <p>These suites are used mostly for office and warehouse storage of chromatograph columns. According to a company representative, the columns contain small quantities of organic solvents. No further information was provided due to the proprietary nature of the business. LFR observed one battery-operated pallet jack and a battery charger in the warehouse. According to the company representative, material handling equipment is serviced in the parking lot by an off-site vendor. LFR also observed a refrigerated storage room and a small QA/QC laboratory and assembly area. Access into these rooms was not allowed. No concerns were noted.</p> |
| <p style="text-align: center;">Pharmaco* 2311 W. 205th St., Suites 109 - 117</p> | <p>This tenant is a pharmaceutical manufacturer. Manufacturing occurs in a clean room that LFR was able to observe through a window. Operations appeared orderly and according to a company representative, approximately two gallons of isopropyl alcohol are stored in the clean room. There is also a ‘chemo’ lab bench and hood that is reportedly licensed by multiple oversight agencies. In the warehouse portion of this tenant space, LFR observed three 55-gallon poly drums used to store SHARPS waste. The waste is disposed of by Medadent Biomedical on a bi-weekly basis. Warehouse storage consists of drugs, syringes and tubing. There is reportedly no liquid storage on site. No concerns were noted.</p> |
| <p style="text-align: center;">A-1 Electric 2301 W. 205th St., Suite 101</p> | <p>This tenant, an electrical contractor, was observed to be storing spray paint and related materials in a metal cabinet in the warehouse portion of the suite. No concerns were noted.</p> |
| <p style="text-align: center;">Cable AML 2271 W. 205th St., Suites 101 & 102</p> | <p>This tenant, a manufacturer of wireless communication systems, was observed to have a small machine shop with one press. Only minimal oil staining was observed on the concrete floor beneath the press and there were no floor drains in the room. LFR observed less than 5-gallon containers of cutting oil and acetone in this room. In addition, LFR observed one metal cabinet that contained spray paint, acetone and</p> |

| TENANT NAME/LOCATION | MATERIALS STORED/USED ONSITE |
|--|--|
| | related materials. One propane-fueled forklift was observed in the warehouse portion of this tenant space. No concerns were noted. |
| J-Exim, Inc. 2291 W. 205 th St., Suite 103 | This tenant, an import/export company, uses a flammable materials cabinet to store small containers of flammable paint prior to off-site shipment. No concerns were noted. |

*No photographs or only limited photographs allowed by tenant.

All tenants observed appeared to practice good housekeeping and chemical storage practices.

There are no maintenance shops or offices on site and janitorial services are handled independently by each tenant. Landscaping is performed by an off-site vendor and no pesticides or insecticides are stored on site.

Interior building materials observed at the Site included ceramic tile, vinyl sheeting, carpeting, vinyl floor tile, drywall, and ceiling tile. The building materials appeared to be in good physical condition and well-maintained.

6.2.3 Hazardous Substances and Petroleum Products in Connection with Identified Uses

LFR investigated the presence of hazardous substances or petroleum products in connection with the Site. Other than those identified in Section 6.2.2, LFR did not observe any other hazardous substances or petroleum products on site in connection with identified uses.

6.2.4 Storage Tanks

No petroleum or chemical underground storage tanks (USTs) or aboveground storage tanks (ASTs) are known to be associated with the Site. No evidence of USTs such as vent pipes, fill pipes or access ways was identified during this investigation. Regulatory records did not identify past USTs or ASTs on site.

6.2.5 Odors

No readily noticeable strong, pungent or noxious odors were identified during this investigation.

6.2.6 Pools of Liquid

No readily visible standing surface water, pools or sumps containing liquids likely to be hazardous substances or petroleum products were identified during this investigation.

6.2.7 Drums

No storage drums were identified during this investigation other than those discussed in Section 6.2.2.

6.2.8 Hazardous Substances and Petroleum Product Containers (Not Necessarily in Connection with Identified Uses)

No containers of hazardous substances or petroleum products were identified during this investigation with the exception of those discussed in Section 6.2.2.

6.2.9 Unidentified Substance Containers

No opened or damaged containers with unidentified contents suspected of being hazardous substances or petroleum products were identified during this investigation.

6.2.10 PCBs

During the Site visit, LFR looked for electrical or hydraulic equipment known to contain PCBs or likely to contain PCBs. Several pad-mounted electrical transformers were observed throughout the Site. The transformers are owned and maintained by Southern California Edison (SCE), the local utility provider. No evidence of leaks or stains was observed on or near the transformers. Based on their presumed date of installation (1985), they are not anticipated to be PCB-containing. No other suspect PCB containing equipment was observed on site.

6.2.11 Pits, Ponds or Lagoons

During the Site visit, LFR looked for pits, ponds or lagoons on the subject property. LFR also looked for pits, ponds and lagoons on adjoining properties to the extent that such features were visually and/or physically observed from the Site or identified in the interviews or records review. No pits, ponds or lagoons were observed at the Site.

6.2.12 Stained Soil or Pavement

During the Site visit, LFR did not observe areas of stained soil and pavement other than *de minimis* oil staining in asphalt-paved parking areas from parked vehicles.

6.2.13 Stressed Vegetation

During the Site visit, LFR looked for areas of stressed vegetation (from other than insufficient water). No areas of stressed vegetation were observed during this investigation.

6.2.14 Solid Waste

During the Site visit, LFR looked for areas that were apparently filled or graded by non-natural causes (or filled with material of unknown origin) suggesting trash construction debris, demolition debris or other solid waste disposal, or mounds or depressions suggesting trash or other solid waste disposal. No such areas were observed during this investigation.

Solid waste dumpsters are located throughout the site and are emptied on a regular basis by Liberty Disposal. LFR observed one overflowing dumpster behind 2291 W. 205th Street that, according to Ms. Ortiz, is owned by a tenant and is not the responsibility of Torrance Commerce Center II. LFR did not observe any evidence of hazardous materials or liquids disposal in the dumpster and no staining was observed beneath the dumpster.

6.2.15 Wastewater

During the Site visit, LFR looked for wastewater or other liquids (including storm water) or any discharge into a drain, ditch, underground injection system or stream on or adjacent to the Site. Wastewater was not observed discharging into any drains or underground injection systems.

6.2.16 Wells

During the Site visit, LFR looked for wells including dry wells, irrigation wells, injection wells, monitoring wells, abandoned wells, or other wells. No wells were observed during this investigation.

6.2.17 Septic Systems

During the Site visit, LFR looked for indications of on-site septic systems or cesspools. No on-site septic systems or cesspools were observed during this investigation. The Site is connected to the sanitary sewer system.

6.2.18 Heating/Cooling

The office buildings have heating, ventilation, and air conditioning (HVAC) units located either in individual tenant spaces or on the building roofs.

6.2.19 Stains or Corrosion

During the Site visit, LFR looked for stained areas or corrosion. No areas of staining or corrosion were observed during this investigation.

6.2.20 Drains and Sumps

No drains or sumps were observed at the Site. There are no loading docks on site.

6.2.21 Water Intrusion

No evidence of water intrusion or microbial amplification was observed at the Site. LFR observed several water-stained ceiling tiles that were apparently damaged from roof leaks. However, according to Ms. Ortiz, all roof leaks are immediately repaired and no major water intrusion events have occurred and no mold growth has been identified on site.

6.2.22 Asbestos-Containing Materials (ACMs)

A survey for suspect ACMs was not included in the scope of work for this Site. Based on the date of building construction (1985), it is unlikely that ACM is present in the Site buildings.

6.2.23 Lead-Based Paint (LBP)

A survey for LBP was not included in the scope of work for this Site. Based on the date of building construction (1985), it is unlikely that LBP is present in the Site buildings.

6.2.24 Current Uses of Adjoining Properties

LFR performed a drive-by reconnaissance of adjacent properties to observe businesses that may use, store, generate or dispose of hazardous materials. The adjacent properties are identified on Figure 2, and are described below:

- **North:** Private residences.
- **East:** Torrance Tech Center, a multi-tenant commercial building
- **South:** W. 205th Street followed by commercial buildings.
- **West:** Commercial building.

None of the adjacent properties are anticipated to impact the Site.

7.0 INTERVIEWS

7.1 Interviews with Site Contacts

LFR spoke with Ms. Alicia Light, Senior Property Manager with AMB Property Corporation, and Ms. Kathy Ortiz, Property Assistant, regarding the Site. Information obtained from the interviews is included throughout the report.

7.2 Interviews with Local Government Officials

Responses and information from local regulatory agencies is included throughout the report.

8.0 FINDINGS

This section discusses known or suspect environmental concerns, historical environmental concerns, and *de minimis* conditions identified during the ESA.

8.1 Known or Suspect Recognized Environmental Conditions (RECs)

LFR identified no known RECs in connection with the Site during this Phase I ESA. However, the following suspect REC was identified:

- Based on the presence of detected groundwater contamination in a well 1,000 feet distant from the Site and the long-term industrial use of the surrounding area, it is possible that groundwater beneath the Site has been impacted. However, past and current uses of the Site indicate that the Site did not contribute to groundwater contamination nor is it suspected of contributing by regulatory agencies. Research indicates that contaminants above their respective MCLs have not been detected at depths shallower than 145 feet bgs. The DTSC does not consider vapor intrusion to be a concern for surrounding properties at this time. Therefore, in the event contaminated groundwater is present beneath the Site, it is unlikely to represent a concern to the Site. In addition, unless the Site was identified as a PRP, the DTSC would not require the Site owner to remediate groundwater associated with that contamination in the event contaminated groundwater underlies the Site. The Site has not been identified by the DTSC or any other regulatory agency as a PRP for groundwater contamination.

8.2 Historical RECs

LFR did not identify any historical RECs in connection with the Site during this Phase I ESA.

8.3 De Minimis Conditions

LFR did not identify any *de minimis* conditions at the Site.

9.0 OPINION

The findings noted above do not indicate the presence of environmental concerns in connection with the Site.

10.0 CONCLUSIONS

LFR has performed a Phase I ESA of the Site in conformance with the scope and limitations of ASTM Practice E 1527-05 for Phase I ESAs. This assessment has revealed no evidence of recognized environmental conditions in connection with the Site, and no further investigation is recommended at this time.

11.0 DEVIATIONS/DATA GAPS

LFR identified no deviations from the ASTM practice. No significant data gaps were identified.

12.0 ADDITIONAL SERVICES

No additional services were provided as part of this Phase I ESA.

13.0 REFERENCES

ASTM International. 2005. Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Designation E 1527-05.

City of Torrance Building Department. 2009. Records review.

City of Torrance Fire Department. 2009. Records request.

California Division of Oil, Gas and Geothermal Resources (DOGGR), 2003. Field Map 126, Gaffey, Torrance, W. Portion Wilmington. July 7.

Department of Toxic Substances Control. 2009. Records review. January.

Environmental Data Resources, Inc. (EDR). 2009. The EDR Radius Map with GeoCheck, Inquiry Number 02395924.2r. January 9.

_____. 2009. The EDR Aerial Photo Decade Package. January 9.

_____. 2009. The EDR Historical Topographic Map Report. January 9.

_____. 2009. Sanborn Map Report. January 9.

_____. 2009. City Directory Abstract. January 9.

Regional Water Quality Control Board, Los Angeles Region. 2009. Records request.
January.

U.S. Geological Survey. 1981, 7.5 Minute Series Topographic Map, Torrance,
California Quadrangle.

URS. 2008. Environmental Summary and Update, AMB Torrance Commerce Center II,
Torrance, CA. November 20.

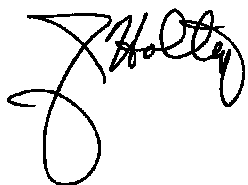
Versar Inc., 1998. *Phase I Environmental Site Assessment, Torrance Commerce Center
II, Torrance, CA.* July 13.

14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

The environmental assessment described herein was conducted by the undersigned employees of LFR. LFR's investigation consisted solely of the activities described in the Introduction of this report, and in accordance with the ASTM-05 guidelines for Phase I Environmental Site Assessments signed prior to initiation of the assessment, as applicable.

We declare that, to the best of our professional knowledge and belief, we meet the definition of environmental professional as defined in §312.10 of 40 Code of Federal Regulations (CFR) 312, and we 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.

Report Prepared By:



January 26, 2009

Janet Holtz, REA #04488
Sr. Associate

Date

Report Reviewed By:



January 26, 2009

Shauna Head
Staff Scientist

Date

APPENDIX A

Site Photographs

APPENDIX B

Historical Research Documentation

APPENDIX C

Regulatory Records Documentation

APPENDIX D

Supporting Documentation

APPENDIX E

Qualifications of Environmental Professionals

APPENDIX F

Interview Documentation

INTERVIEW DOCUMENTATION

- Ms. Alicia Light
Senior Property Manager
AMB Property Corporation
- Ms. Kathy Ortiz
Property Assistant
AMB Property Corporation
- Mr. Greg Holmes
Unit Chief, Southern California Cleanup Operations
DTSC
- Mr. John Woo
SVP - Acquisitions
The Koll Company
- Ms. Sue Herber
City Clerk
Torrance Fire Department
- Ms. Stephanie Gentry
Senior Toxicologist
LFR, Inc.