

PARTNER

Engineering and Science, Inc.



PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

**14940 East Proctor Avenue
and 342 South 9th Avenue**
City of Industry, California 91745

Report Date: September 24, 2021
Partner Project No. 21-337685.1



Prepared for:

Rexford Industrial Realty, L.P.
11620 Wilshire Boulevard, Suite 1000
Los Angeles, California 90025

September 24, 2021

Mr. Patrick Schlehuber
Rexford Industrial Realty, L.P.
11620 Wilshire Boulevard, Suite 1000
Los Angeles, California 90025

Subject: Phase I Environmental Site Assessment
14940 East Proctor Avenue and 342 South 9th Avenue
City of Industry, California 91745
Partner Project No. 21-337685.1

Dear Mr. Schlehuber:

Partner Engineering and Science, Inc. (Partner) is pleased to provide the results of the *Phase I Environmental Site Assessment* (Phase I ESA) of the above-mentioned property (the "subject property" or the "Site"). This assessment was performed in conformance with the scope and limitations of ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, and with All Appropriate Inquiries (AAI) Final Rule 40 CFR Part 312.

This assessment included a site reconnaissance as well as research and interviews with representatives of the public, property ownership, site manager, and regulatory agencies. An assessment was made, conclusions stated, and recommendations outlined.

We appreciate the opportunity to provide environmental services to you. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (310) 765-7243.

Sincerely,



Jenny Redlin, REPA
Relationship Manager

EXECUTIVE SUMMARY

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in accordance with the scope of work and limitations of ASTM Standard Practice E1527-13, the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) and the requirements in the Master Services Agreement between Partner and Rexford Industrial Realty, L.P. (the "MSA") for the property located at 14940 East Proctor Avenue and 342 South 9th Avenue in City of Industry, Los Angeles County, California (the "subject property"). The Phase I Environmental Site Assessment is designed to provide Rexford Industrial Realty, L.P. with an assessment concerning the environmental condition of the subject property. The services set forth herein are governed by the MSA.

Property Description

The subject property is located on the southwest side of Proctor Avenue and the northwest side of South 9th Avenue within a mixed commercial and industrial area of Los Angeles County. Please refer to the table below for further description of the subject property:

Subject Property Data

Addresses:	14940 East Proctor Avenue and 342 South 9th Avenue, City of Industry, California
Historical Address:	333 South 9th Avenue
Property Use:	Industrial
Land Acreage (Ac):	7.49 Ac
Number of Buildings:	Three
Number of Floors:	One and Two
Gross Building Area (SF):	225,828 SF (Total)
Date of Construction:	1962 and 1992
Assessor's Parcel Number (APN):	8208-002-043 and 8208-002-049
Type of Construction:	Concrete Tilt-Up and Wood-Framed
Current Tenants:	Cacique Inc.
Site Assessment Performed By:	Chloe Adelmann of Partner
Site Assessment Conducted On:	September 20, 2021

The subject property is currently occupied by Cacique Inc. for industrial use. Onsite operations consist of cheese manufacturing, packaging and distribution, general office use, and property and industrial manufacturing line maintenance. In addition to the current structures, the subject property is also improved with asphalt and concrete paved parking areas, walkways, storage, areas, loading docks, and limited landscaping.

According to available historical sources, the subject property was formerly undeveloped land as early as 1894; agricultural land circa 1928; developed with two of the existing industrial structures in 1962; and developed with the third industrial structure in 1992. Tenants on the subject property included Wilson and Co. *meat processing/packing* (1962-1976), Elrey Mexican Foods *food processing* (1982), and Cacique Inc. *cheese manufacturing/food processing* (1985-Present).

The immediately surrounding properties consist of an industrial structure and Los Angeles County Public Works Department Road Maintenance Division to the northeast across Proctor Avenue; Service Bros.

Transportation to the southeast and Beyond Ultimate to the southeast across South 9th Avenue; Ninth Avenue Foods to the southwest across railroad tracks; and Americold East Side Costco to the northwest.

According to a previous subsurface investigation conducted on a nearby property (14923 East Proctor Avenue and Case #102.0320), groundwater depth in the vicinity of the subject property is inferred to be approximately 54 feet below ground surface (bgs) and groundwater flow is towards the north-northwest.

Findings

A *recognized environmental condition (REC)* refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The following was identified during the course of this assessment:

- **Historical Industrial Use.** The subject property was developed for industrial food and meat processing and manufacturing in 1962. The subject property was documented as formerly conducting truck maintenance and fueling onsite and currently utilizes a maintenance shop for equipment line upkeep. Industrial operations of this nature commonly use conduits to the subsurface such as sumps, clarifiers/sand traps, drains, and underground storage tanks (USTs) and may also involve the use of solvent parts washers and solvent spray booths. From regulatory records and onsite observations, the site has been developed with sumps and a clarifier (also referred to as a sand trap). The clarifier and sump represent the potential for impacts to the subsurface of the subject property. According to onsite observations, the current clarifier in use is aboveground; however, no information was available regarding a former sand trap clarifier, which was reportedly installed in 1963, based on building permits for the subject property. Also, according to regulatory records, an automotive spray booth was identified on the subject property in 1991. This spray booth was not observed during site reconnaissance and the location of the spray booth was not provided in the records. A solvent parts washer was observed during site reconnaissance on the east side of the subject property. According to a review of manifest records, the subject property was noted as generating tetrachloroethylene (PCE) from 1999 to 2001 and in 2016. Quantities of PCE ranged 0.015-ton from to 2.436-tons. Chlorinated solvents such as PCE, even when properly stored and handled, often migrate into the subsurface as a result of small releases associated with onsite operations. Additionally, chlorinated solvents are highly mobile chemicals that can easily accumulate in soil and migrate to groundwater beneath a facility. Furthermore, historical hazardous substance storage, use and disposal practices at the subject property are unknown, particularly in connection with the reported former sand trap. Based on the long-term use of the subject property for manufacturing operations, identified use of petroleum products and chlorinated solvents onsite, and identified conduits to the subsurface, the former and current industrial use of the subject property represents a REC.
- **San Gabriel Valley Area 4 Superfund Site.** The subject property is located in the vicinity of the San Gabriel Valley Area 4 Superfund Site. This site is one of four Superfund sites in the San Gabriel Valley. The Superfund sites relate to multiple areas of contamination in the San Gabriel Basin aquifer, which is used for purposes that include drinking water. The Superfund sites include areas of soil and groundwater contamination underlying portions of the cities of Alhambra, Arcadia,

Azusa, Baldwin Park, Industry, El Monte, La Puente, Monrovia, Rosemead, South El Monte, and West Covina. The San Gabriel Valley covers approximately 170 square miles. Groundwater contamination was first detected in the San Gabriel Valley in 1979. Following this discovery, the California Department of Health Services (CDHS) analyzed water samples collected from water supply wells throughout the Valley to assess the extent of contamination. By 1984, 59 wells were found to be contaminated with volatile organic compounds (VOCs). In the late 1990s, perchlorate and other newly discovered contaminants were detected in the additional water supply and groundwater monitoring wells. In the early 1990s, EPA divided the San Gabriel Valley into eight project areas, including the Puente Valley area. In 1993, EPA identified Potentially Responsible Parties (PRPs) at the site. Currently, the EPA is working with the PRPs on the Remedial Design. The selected remedy includes containment of the contaminated shallow and intermediate groundwater at the mouth of Puente Valley. Cacique Inc., current tenant of the subject property, was listed in the WIP (Well Investigation Program) database and received no further action (NFA) status from the Regional Water Quality Control Board (RWQCB) San Gabriel Valley Cleanup Program. Adjacent and surrounding properties throughout the subject property vicinity were investigated as a part of the San Gabriel Valley Cleanup Program. Le Van Specialty Company Inc. at 14923 East Proctor Avenue is located approximately 70 feet northeast of the subject property across Proctor Avenue. The facility is listed as actively investigated regarding the WIP program. According to release listings and the GeoTracker database, the site had a release of VOCs including PCE and trichloroethylene (TCE) impacting groundwater and the RWQCB opened the case on August 11, 1992. From review of an Additional Phase II Environmental Site Assessment by SALEM Engineering Group, Inc. dated June 7, 2019, groundwater was encountered at approximately 54 feet bgs and the direction of groundwater flow was to the north-northwest. Sixteen soil borings were advanced at the facility and converted to soil vapor probes at 5 and 15 feet bgs. Total petroleum hydrocarbons (TPH) and VOCs were non-detect in any of the soil samples. Title 22 metals were not detected above commercial and industrial screening levels. However, PCE was detected at the 5-foot soil vapor samples ranging from 0.17 micrograms per liter ($\mu\text{g/L}$) to 4.4 $\mu\text{g/L}$ and the 15-foot soil vapor samples from 0.32 $\mu\text{g/L}$ to 15 $\mu\text{g/L}$. TCE was detected at 0.17 $\mu\text{g/L}$ at the 15-foot soil vapor sample. SALEM completed a Human Health Risk Assessment (HHRA) using the maximum PCE soil vapor concentration at a depth of 5 feet bgs (4.4 $\mu\text{g/L}$). SALEM concluded that the data suggested that soil and soil vapor at the subject property did not pose a potential risk to human health or the environment. VOCs detected in the groundwater sample collected from MW-1 included PCE at 32 $\mu\text{g/L}$ and TCE at 13 $\mu\text{g/L}$. These concentrations exceeded their respective Maximum Contaminant Levels (MCLs) of 5.0 $\mu\text{g/L}$.

According to an Office of Environmental Health Hazard Assessment (OEHHA) Review Report for the site dated June 14, 2019, the 2019 Additional Phase II Environmental Site Assessment was reviewed by a toxicologist. OEHHA's estimated indoor air concentrations and corresponding cancer risk and non-cancer hazard index exceeded 10-5. The estimate based on samples within the building footprint also exceeded a hazard index of 1. OEHHA's estimates represent potential risks at the site but were noted that they may not be the actual risks experienced by occupants in the on-site building. OEHHA recommended that indoor air sampling would provide more

definitive information on potential occupants' VOC exposure. The RWQCB completed a review and evaluation of the information provided and determined that the site has met the RWQCB's requirements for NFA for soils only. However, the RWQCB noted that groundwater quality shall continue to be monitored annually. The impacts of groundwater in the vicinity of the subject property from the San Gabriel Valley Area 4, with PCE and TCE concentrations above MCLs, shallow depth to groundwater in the vicinity of the subject property, and OEHHA evaluation of the adjacent property as an identified potential risk for vapor intrusion, represents a vapor encroachment concern (VEC) for the subject property warranting further assessment and human health risk evaluation.

A *controlled recognized environmental condition (CREC)* refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

- Partner identified no CRECs in connection with the subject property.

A *historical recognized environmental condition (HREC)* refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The following HREC was identified during the course of this assessment:

- **Former USTs.** The subject property was formerly developed with a 10,000-gallon gasoline UST, a 10,000-gallon diesel UST, a 500-gallon new oil UST (also referred to as a 550-gallon), and a 500-gallon waste oil UST. These USTs were located on the south side of the subject property structure. On June 10, 1990, the 10,000-gallon gasoline UST, 10,000-gallon diesel UST, and 500-gallon new oil UST were removed from the subject property under oversight of Los Angeles County Department of Public Works (LACDPW). Two soil borings were advanced at the inverts of both ends of the fueling USTs and one soil boring was advanced at the central invert of the oil UST. Soil samples were analyzed for TPH and benzene, toluene, ethylbenzene and xylene (BTEX). According to review of analytical results, TPH and BTEX were non-detect in soil samples with exception of a minor concentrations of 57 parts per billion (ppb) of toluene. Based on the results of the sampling, the LACDPW issued a "no further action" designation for the three USTs on July 18, 1990.

In October 1990, the Cacique facility was inspected by the RWQCB due to its past and present chemical storage, handling and disposal practices. The site inspection was required by the U.S. EPA and was enforced by the RWQCB under the WIP due to the subject property's location within the San Gabriel Valley Area 4 Superfund Site contamination plume.

On January 2, 1991, one 500-gallon waste oil UST (also referred to as 550-gallons; i.e., the fourth and last UST reportedly associated with the subject property) was removed from the southern portion of the subject property under the oversight of the LACDPW. A total of four soil samples were collected from the tank excavation. TPH was detected at a maximum concentration of up to

1,950 milligrams per kilogram (mg/kg) below the east end of the tank and 30 micrograms per kilogram ($\mu\text{g}/\text{kg}$) of chloroform were identified in samples collected from the excavation. The chloroform concentration was below the RWQCB's water quality goals of 190 $\mu\text{g}/\text{kg}$ and TPH was characterized as hydraulic oil. However, in February 1991, the RWQCB indicated that the RWQCB was not involved in overseeing the removal of the waste oil UST and the sampling of the soil was not conducted in a fashion acceptable by the RWQCB. The RWQCB suggested that an additional investigation be conducted under their oversight in order to be considered for "case closure". On July 23, 1991, an additional investigation was conducted at the subject property in the vicinity of the former waste oil UST under the oversight of the RWQCB. Samples were collected in the vicinity of the former waste oil UST at 18.5 feet bgs and analyzed for TPH and VOCs. According to the analytical results, all contaminants of concern were non-detect. Based on the results of the investigation and the previous soil sampling results, final closure was requested for the former waste oil UST.

On April 25, 1996, the RWQCB San Gabriel Valley Cleanup Program provided case closure, based on the indication that no vapor degreaser was used onsite and chlorinated VOCs were identified onsite. Based on the UST removal, non-detect to low concentrations identified during soil sampling, and case closure during a time of stringent regulatory oversight, these USTs represent an HREC. Partner recommends no further action or investigation regarding this issue.

An *environmental issue* refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of this assessment:

- The subject property was formerly developed with railroad tracks on the northwest portion of the subject property from at least 1964 to 1979. Railroad spurs represent environmental concerns due to the potential for historical application of oils containing polychlorinated biphenyls (PCBs), herbicides, and arsenic for pest and weed control. Concentrations of these constituents of concern resulting from the railroad right-of-way, if any, would likely be confined to the near subsurface sediments and would be unlikely to represent an environmental concern to the continued use of the subject property for commercial purposes.
- Due to the age of the subject property buildings, there is a potential that asbestos-containing material (ACM) and/or lead-based paint (LBP) are present. Readily visible suspect ACMs and painted surfaces were observed in good condition. Should these materials be replaced, the identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants, and any LBP should be removed in accordance with all applicable laws.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 14940 East Proctor Avenue and 342 South 9th Avenue in City of

Industry, Los Angeles County, California (the "subject property"). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report.

This assessment has revealed evidence of a REC, an HREC and environmental issues in connection with the subject property, as described above.

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1.0 INTRODUCTION

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Standard Practice E1527-13 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) for the property located at 14940 East Proctor Avenue and 342 South 9th Avenue in City of Industry, Los Angeles County, California (the "subject property"). Any exceptions to, or deletions from, this scope of work are described in the report.

1.1 Purpose

The purpose of this ESA is to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E1527-13) affecting the subject property, including those that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the subject property or require a material change in the use thereof; 3) require clean-up, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the subject property under any applicable environmental law; 4) may affect the value of the subject property; and 5) may require specific actions to be performed with regard to such conditions and circumstances. The information contained in the ESA Report may be used by Client to, among other things: 1) evaluate its legal and financial liabilities for transactions related to foreclosure, purchase, sale, loan origination, loan workout or seller financing; 2) evaluate the subject property's overall development potential, the associated market value and the impact of applicable laws that restrict financial and other types of assistance for the future development of the subject property; and/or 3) determine whether specific actions are required to be performed prior to the foreclosure, purchase, sale, loan origination, loan workout or seller financing of the subject property.

This ESA was performed to permit the *User* to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on scope of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) liability (hereinafter, the "*landowner liability protections*," or "*LLPs*"). ASTM Standard E1527-13 constitutes "*all appropriate inquiries* into the previous ownership and uses of the *property* consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35)(B).

1.2 Scope of Work

The scope of work for this ESA is in accordance with the requirements of ASTM Standard E1527-13. This assessment included: 1) a property and adjacent site reconnaissance; 2) interviews with key personnel; 3) a review of historical sources; 4) a review of regulatory agency records; and 5) a review of a regulatory database report provided by a third-party vendor. Partner contacted local agencies, such as environmental health departments, fire departments and building departments in order to determine any current and/or former hazardous substances usage, storage and/or releases of hazardous substances on the subject property. Additionally, Partner researched information on the presence of activity and use limitations (AULs) at these agencies. As defined by ASTM E1527-13, AULs are the legal or physical restrictions or limitations on the use of, or access to, a site or facility: 1) to reduce or eliminate potential

exposure to hazardous substances or petroleum products in the soil or groundwater on the subject property; or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls (IC/ECs), are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil or groundwater on the property.

Environmental concerns which are beyond the scope of a Phase I ESA as defined by ASTM include the following: ACMs, LBP, radon, and lead in drinking water. These issues may affect environmental risk at the subject property and may warrant discussion and/or assessment; however, are considered non-scope issues. If specifically requested by the Client, these non-scope issues are discussed in Section 6.3.

1.3 Limitations

Partner warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in the Scope of Work. These methodologies are described as representing good commercial and customary practice for conducting an ESA of a property for the purpose of identifying recognized environmental conditions. There is a possibility that even with the proper application of these methodologies there may exist on the subject property conditions that could not be identified within the scope of the assessment or which were not reasonably identifiable from the available information. Partner believes that the information obtained from the record review and the interviews concerning the subject property is reliable. However, Partner cannot and does not warrant or guarantee that the information provided by these other sources is accurate or complete. The conclusions and findings set forth in this report are strictly limited in time and scope to the date of the evaluations. The conclusions presented in the report are based solely on the services described therein, and not on scientific tasks or procedures beyond the scope of agreed-upon services or the time and budgeting restraints imposed by the Client. No other warranties are implied or expressed.

Some of the information provided in this report is based upon personal interviews, and research of available documents, records, and maps held by the appropriate government and private agencies. This report is subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollections of those persons contacted.

This practice does not address requirements of any state or local laws or of any federal laws other than the all appropriate inquiry provisions of the LLPs. Further, this report does not intend to address all of the safety concerns, if any, associated with the subject property.

Environmental concerns, which are beyond the scope of a Phase I ESA as defined by ASTM include the following: ACMs, LBP, radon, and lead in drinking water. These issues may affect environmental risk at the subject property and may warrant discussion and/or assessment; however, are considered non-scope issues. If specifically requested by the Client, these non-scope issues are discussed in Section 6.3.

1.4 User Reliance

The enclosed ESA has been performed for the exclusive use of Rexford Industrial Realty, L.P., and/or its subsidiaries, as their interests may appear, for the transaction at issue concerning the subject property located at 14940 East Proctor Avenue and 342 South 9th Avenue in City of Industry, California. In the

event of any conflict between the terms and conditions of this report and the terms and conditions of the MSA, the MSA shall control

1.5 Limiting Conditions

The findings and conclusions contain all of the limitations inherent in these methodologies that are referred to in ASTM E1527-13.

Specific limitations and exceptions to this ESA are more specifically set forth below:

- Interviews with past or current owners, operators and occupants were not reasonably ascertainable and thus constitute a data gap. Based on information obtained from other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment and is not considered significant.
- Partner requested information relative to deed restrictions and environmental liens, a title search, and completion of the AAI User Questionnaire from the Report User. This information was not provided at the time of the assessment. Based on information obtained from other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment and is not considered significant.
- Partner was unable to determine the property use at 5-year intervals, which constitutes a data gap. Except for property tax files and recorded land title records, which were not considered to be sufficiently useful, Partner reviewed all standard historical sources and conducted appropriate interviews. Based on information obtained from other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment and is not considered significant.
- Partner observed all interior units and all common areas. However, at the time of assessment the tenant of the subject property allowed only a visual assessment of the interior and exterior of the subject property. Photographs of the interior and exterior of the subject property are not available for this report, with exception of photographs taken from the public right of way. Based on information obtained from other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment and is not considered significant.

2.0 SITE DESCRIPTION

2.1 Site Location and Legal Description

The subject property at 14940 East Proctor Avenue and 342 South 9th Avenue in City of Industry, California is located on the southwest side of Proctor Avenue and the northwest side of South 9th Avenue. According to the Los Angeles County Assessor, the subject property is legally described as *P M 250-80 LOT 1* and **TR=PARCEL MAP AS PER BK 137 P 65 OF P M *THAT POR OF LOT 4 LYING SW OF A LINE PARALLEL WITH AND DIST SW AT R/A 108 FT FROM NE LINE OF SD LOT*, and ownership is currently vested in De Cardenas Antonio Trust.

Please refer to Figure 1: Site Location Map, Figure 2: Site Plan, Figure 3: Topographic Map, and Appendix A: Site Photographs for the location and site characteristics of the subject property.

2.2 Current Property Use

The subject property is currently occupied by Cacique Inc. for industrial use. Onsite operations consist of cheese manufacturing, packaging and distribution, general office use, and property and industrial manufacturing line maintenance. The subject property consists of a single-story office and manufacturing building, a two-story maintenance building, and a two-story boiler room and maintenance shop building. In addition to the current structures, the subject property is also improved with asphalt and concrete paved parking areas, walkways, storage, areas, loading docks, and limited landscaping.

The subject property is designated for industrial development by the City of Industry.

The subject property is identified as a Facility and Manifest Data (HAZNET), CalEPA Regulated Site Portal Data (CERS), Hazardous Waste Tracking System (HWTS), California Hazardous Material Incident Report System (CHMIRS), CalEPA Regulated Site Portal Data Hazardous Waste (CERS HAZ WASTE), Enforcement & Compliance History Information (ECHO), Facility Index System/Facility Registry System (FINDS), Waste Discharge System (WDS), Well Investigation Program Case List (CA WIP), Los Angeles County Street Number List (Los Angeles Co. HMS), Resource Conservation and Recovery Act Non Generator / No Longer Regulated (RCRA NonGen/NLR), Emergency Response Notification Systems (ERNS), Integrated Compliance Information System (ICIS), Risk Management Plan (RMP), Statewide Environmental Evaluation and Planning System UST Listing (SWEEPS UST), Hazardous Waste & Substance Site List (HIST Cortese), Emissions Inventory Data (EMI), California Integrated Water Quality System (CIWQS), National Pollutant Discharge Elimination System (NPDES), Hazardous Substance Storage Container Database (HIST UST), and Leaking Underground Storage Tank Report (LUST) site in the regulatory database report, as further discussed in Section 4.2.

2.3 Current Use of Adjacent Properties

The subject property is located within a mixed commercial and industrial area of Los Angeles County. During the vicinity reconnaissance, Partner observed the following land use on properties in the immediate vicinity of the subject property:

Immediately Surrounding Properties

Northeast: Proctor Avenue beyond which is an industrial structure (14923 Proctor Avenue) and Los Angeles County Public Works Department Road Maintenance Division (14959 Proctor

Immediately Surrounding Properties

Avenue)

Southeast: Service Bros. Transportation (305 South 9th Avenue) and South 9th Avenue beyond which is Beyond Ultimate (360 South 9th Avenue)

Southwest: Railroad tracks beyond which is Ninth Avenue Foods (425 South 9th Avenue)

Northwest: Americold East Side Costco (14890 Proctor Avenue)

The adjacent properties to the northeast, southeast, southwest, and northwest are identified as a SWEEPS UST, Resources Conservation and Recovery Act Small Quantity Generator (RCRA-SQG), RCRA NonGen/NLR, CERS Haz Waste, HAZNET, NPDES, CERS, HWTS, Hist UST, Spills, Leaks, Investigations and Cleanup Sites (SLIC), LUST, Enforcement Action Listing (ENF), CalEPA Regulated Site Portal Data Tanks (CERS TANKS), CA WIP, Los Angeles Co. HMS, (Manifest), Solid Waste Information System and Active, Closed, and Inactive Landfills (SWF/LF), Aboveground Storage Tank (AST), Underground Storage Tank (UST), EMI, HIST Cortese, Resources Conservation and Recovery Act Large Quantity Generator (RCRA-LQG), Deed Restriction Listing (DEED), and Superfund Enterprise Management System (SEMS) sites in the regulatory database report of Section 4.2.

2.4 Physical Setting Sources

2.4.1 Topography

The United States Geological Survey (USGS) *Baldwin Park, California* Quadrangle 7.5-minute series topographic map was reviewed for this ESA. According to the contour lines on the topographic map, the subject property is located at approximately 303 feet above mean sea level (MSL). The contour lines in the area of the subject property indicate the area is sloping gently toward the west. Specific improvements, other than roads and landmarks, are not depicted on the 2012 topographic map.

A copy of the 2012 topographic map is included as Figure 3 of this report.

2.4.2 Hydrology

The nearest surface water in the vicinity of the subject property is the Puente Creek located approximately 200 feet northwest of the subject property. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed at the subject property during this assessment.

According to available information, a public water system operated by the San Gabriel Valley Water Company serves the subject property vicinity. The source of public water for the City of Industry is the groundwater from a natural underground aquifer.

According to a previous subsurface investigation conducted on a nearby property (14923 East Proctor Avenue and Case #102.0320), the depth of groundwater in the vicinity of the subject property is inferred to be approximately 54 feet below ground surface (bgs) and groundwater flow is towards the north-northwest.

2.4.3 Geology/Soils

The subject property is located within the Puente Basin of the San Gabriel Valley, which is comprised of alluvial deposits overlaying bedrock. The San Gabriel Valley faces westward and is bounded by the San Gabriel Mountains to the north and the Repetto, Merced, Puente and San Jose Hills to the east, south and

southwest. These hills are the remnants of a dissected upland that once extended well beyond the present limits of the hills. The hills are composed of complexly folded and faulted Cenozoic marine classic sedimentary rocks and are dissected by streams that created the Puente Valley. These streams deposited a sequence of alluvial sediments eroded from the adjacent hills. The sediments underlying the vicinity of the property consist of non-marine Quaternary unconsolidated gravel, sand and silt deposits several hundred feet in thickness.

Based on information obtained from the United States Department of Agriculture (USDA) Natural Resources Conservation Service Web Soil Survey online database, the subject property is mapped as Urban land-Biscailuz-Pico complex from alluvial fan formations and with slopes ranging from 0 to 2 percent.

2.4.4 Flood Zone Information

Partner performed a review of the Flood Insurance Rate Map, published by the Federal Emergency Management Agency. According to Community Panel Number 06037C1700F, dated September 26, 2008, the subject property appears to be located in Zone X, an area located outside of the 100-year and 500-year flood plains.

3.0 HISTORICAL INFORMATION

Partner obtained historical use information about the subject property from a variety of sources. A chronological listing of the historical data found is summarized in the table below:

Historical Use Information

Period/Date	Source	Description/Use
1894-1927	Topographic Maps	Undeveloped/Native land
1928-1952	Aerial Photographs	Agricultural land
1962-1992	Aerial Photographs, City Directories, Building Permits, Previous Report, Regulatory Records	Developed with two of the existing industrial structures (meat packing plant and cheese food processing)
1992-Present	Aerial Photographs, Building Records, City Directories, Interviews, Onsite Observations, Previous Report, Regulatory Records	Developed with the third existing industrial structure (cheese food processing)

Tenants on the subject property included Wilson and Co. *meat processing/packing* (1962-1976), Elrey Mexican Foods *food processing* (1982), and Cacique Inc. *cheese manufacturing/food processing* (1985-Present).

Potential environmental concerns were identified in association with the current or former use of the subject property, as discussed below:

- The subject property was developed for industrial food and meat processing and manufacturing in 1962. The subject property was documented as formerly conducting truck maintenance and fueling onsite and currently utilizes a maintenance shop for equipment line upkeep. Industrial operations of this nature commonly use conduits to the subsurface such as sumps, clarifiers/sand traps, drains, and underground storage tanks (USTs) and may also involve the use of solvent parts washers and solvent spray booths. From regulatory records and onsite observations, the site has been developed with sumps and a clarifier (also referred to as a sand trap). The clarifier and sump represent the potential for impacts to the subsurface of the subject property. According to onsite observations, the current clarifier in use is aboveground; however, no information was available regarding a former sand trap clarifier, which was reportedly installed in 1963, based on building permits for the subject property. Also, according to regulatory records, an automotive spray booth was identified on the subject property in 1991. This spray booth was not observed during site reconnaissance and the location of the spray booth was not provided in the records. A solvent parts washer was observed during site reconnaissance on the east side of the subject property. According to a review of manifest records, the subject property was noted as generating tetrachloroethylene (PCE) from 1999 to 2001 and in 2016. Quantities of PCE ranged 0.015-ton from to 2.436-tons. Chlorinated solvents such as PCE, even when properly stored and handled, often migrate into the subsurface as a result of small releases associated with onsite operations. Additionally, chlorinated solvents are highly mobile chemicals that can easily accumulate in soil and migrate to groundwater beneath a facility. Furthermore, historical hazardous substance storage, use and disposal practices at the subject property are unknown, particularly in connection with the reported former sand trap. Based on the long-term use of the subject property for manufacturing operations, identified use of petroleum products and chlorinated

solvents onsite, and identified conduits to the subsurface, the former and current industrial use of the subject property represents a REC.

- The subject property was formerly developed with railroad tracks on the northwest portion of the subject property from at least 1964 to 1979. Railroad spurs represent environmental concerns due to the potential for historical application of oils containing polychlorinated biphenyls (PCBs), herbicides, and arsenic for pest and weed control. Concentrations of these constituents of concern resulting from the railroad right-of-way, if any, would likely be confined to the near subsurface sediments and would be unlikely to represent an environmental concern to the continued use of the subject property for commercial purposes.
- The subject property parcel was historically used for agricultural purposes. There is a potential that agricultural related chemicals such as pesticides, herbicides, and fertilizers, may have been used and stored onsite. The subject property is either paved over or covered by building structures that minimize direct contact to any potential remaining concentrations in the soil. Additionally, during previous site development activities, near surface soils (where residual agricultural chemical concentrations would have most likely been present, if at all) were likely mixed with fill material or disturbed during grading. Also, it is common that engineered fill material is placed over underlying soils as part of the development activities. These additional variables serve to further reduce the potential for exposure to residual agricultural chemicals (if any). Based on these reasons, Partner concludes that the possible former use of agricultural chemicals is not expected to represent a significant environmental concern at this time.

No other potential environmental concerns were identified in association with the current or former use of the subject property.

3.1 Aerial Photograph Review

Partner obtained available aerial photographs of the subject property and surrounding area from Environmental Data Resources (EDR) on September 15, 2021. The following was observed on the subject property and adjacent properties during the aerial photograph review:

<i>Date:</i>	<i>1928</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	Appears to be agricultural land		
Northeast:	Appears to be agricultural land across Proctor Avenue		
Southeast:	Appears to be agricultural land and agricultural land across South 9 th Avenue		
Southwest:	Appears to be agricultural land		
Northwest:	Appears to be agricultural land		

<i>Date:</i>	<i>1938, 1948, 1952</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	No significant changes visible		
Northeast:	Appears to be developed for residential purposes and with agricultural land across Proctor Avenue		
Southeast:	No significant changes visible		
Southwest:	No significant changes visible		
Northwest:	No significant changes visible		

<i>Date:</i>	<i>1964</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	Appears to be developed with the existing manufacturing industrial structure, maintenance building, parking lot, and railroad tracks		
Northeast:	Appears to be developed for residential and industrial purposes and with vacant land across Proctor Avenue		
Southeast:	Appears to be partially developed with a parking lot and agricultural land and agricultural land across South 9th Avenue		
Southwest:	Appears to be developed with agricultural land across railroad tracks		
Northwest:	No significant changes visible		

<i>Date:</i>	<i>1977, 1979</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	No significant changes visible		
Northeast:	Appears to be developed for industrial purposes across Proctor Avenue		
Southeast:	Appears to be partially developed with a parking lot and agricultural land and agricultural land and developed for industrial purposes across South 9th Avenue		
Southwest:	Appears to be developed for industrial purposes across railroad tracks		
Northwest:	No significant changes visible		

<i>Date:</i>	<i>1981</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	Appears to be developed with the existing manufacturing industrial structure, maintenance building, and parking lot		
Northeast:	No significant changes visible		
Southeast:	Appears to be partially developed with a parking lot and vacant land and vacant land and developed for industrial purposes across South 9th Avenue		
Southwest:	No significant changes visible		
Northwest:	Appears to be vacant land		

<i>Date:</i>	<i>1983</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	No significant changes visible		
Northeast:	No significant changes visible		
Southeast:	No significant changes visible		
Southwest:	No significant changes visible		
Northwest:	Appears to be developed with a parking lot and vacant land		

<i>Date:</i>	<i>1990</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	No significant changes visible		
Northeast:	No significant changes visible		
Southeast:	Appears to be developed with a parking lot and for industrial purposes and for industrial purposes across South 9 th Avenue		
Southwest:	No significant changes visible		
Northwest:	No significant changes visible		

<i>Date:</i>	<i>1994</i>	<i>Scale:</i>	<i>1"=500'</i>
Subject Property:	Appears to be developed with the existing three industrial structures and vacant land		
Northeast:	No significant changes visible		
Southeast:	Appears to be vacant land and developed for industrial purposes and for industrial purposes across South 9 th Avenue		

Date:	1994	Scale:	1"=500'
Southwest:	No significant changes visible		
Northwest:	No significant changes visible		

Date:	2005	Scale:	1"=500'
Subject Property:	Appears to be developed with the existing two industrial structures and parking lot		
Northeast:	No significant changes visible		
Southeast:	No significant changes visible		
Southwest:	No significant changes visible		
Northwest:	Appears to be developed for industrial purposes		

Date:	2009, 2012, 2016	Scale:	1"=500'
Subject Property:	No significant changes		
Northeast:	No significant changes visible		
Southeast:	Appears to be vacant land/storage yard and developed for industrial purposes and for industrial purposes across South 9 th Avenue		
Southwest:	No significant changes visible		
Northwest:	No significant changes visible		

Copies of select aerial photographs are included in Appendix B of this report.

3.2 Fire Insurance Maps

Partner reviewed the collection of Sanborn Fire insurance maps from EDR on September 13, 2021. Sanborn map coverage was not available for the subject property.

A copy of the Sanborn Maps "No Coverage" letter is included in Appendix B of this report.

3.3 City Directories

Partner reviewed historical city directories obtained from EDR on September 17, 2021 for past names and businesses that were listed for the subject property and adjacent properties. The findings are presented in the following table:

City Directory Search for 14940 East Proctor Avenue and 333 and 342 South 9th Avenue (Subject Property)	
Year(s)	Occupant Listed
1964	Wilson and Co. (333 South 9th Avenue)
1969	Wilson and Co. (333 South 9th Avenue)
1973	Wilson and Co. Meat Packers (333 South 9th Avenue)
1976	Wilson and Co. Meat Packers (333 South 9th Avenue)
1982	Elrey Mexican Foods (333 South 9th Avenue)
1987	Cacique Cheese Co. (14940 East Proctor Avenue), XXXX (333 South 9th Avenue)
1992	Cacique Cheese Co., Guajiro Distributor (14940 East Proctor Avenue)
1995	Cacique Cheese Co., Noche Buena Distribution (14940 East Proctor Avenue)
2005	Cacique Inc. (14940 East Proctor Avenue)
2010	Cacique Cheese (14940 East Proctor Avenue)
2014	Cacique Cheese (14940 East Proctor Avenue)

* XXXX= A phone number is present but is not registered to a tenant or is disconnected.

According to the city directory review, the subject property has been occupied by Cacique Inc. since 1987. For more information refer to Section 3.0.

City Directory Search for Adjacent Properties

Year(s)	Occupant Listed
1969	Aluminum Fronts Inc. (14923 Proctor Avenue), Artistic Sample Co. (360 South 9 th Avenue)
1973	Los Angeles County Road Department (14959 Proctor Avenue), Artistic Sample Co. (360 South 9 th Avenue), Aerosol Services Co. Inc. (425 South 9 th Avenue)
1976	Levan Specialty Co. (14923 Proctor Avenue), Los Angeles County Road Maintenance Yard (14959 Proctor Avenue), Artistic Sample Co. (360 South 9 th Avenue), Aerosol Services Co. Inc. (425 South 9 th Avenue)
1982	Levan Specialty Co. (14923 Proctor Avenue), Los Angeles County Road Maintenance Yard (14959 Proctor Avenue), Artistic Sample Co. (360 South 9 th Avenue), Aerosol Services Co. Inc. (425 South 9 th Avenue)
1987	Albrass Entprs Inc. (14923 Proctor Avenue), Los Angeles Works Road Maintenance (14959 Proctor Avenue), Artistic Sample Co. (360 South 9 th Avenue), Aerosol Services Co. Inc. (425 South 9 th Avenue)
1992	Bertolini Seating CA, Express Disposal Co. (14923 Proctor Avenue), Los Angeles Works Road Maintenance (14959 Proctor Avenue), M Bro Corp (305 South 9 th Avenue), Artistic Sample Co. (360 South 9 th Avenue), Aerosol Services Co. Inc. (425 South 9 th Avenue)
1995	Los Angeles County Road Maintenance (14959 Proctor Avenue), M Bro Corp (305 South 9 th Avenue), Aerosol Services Co. Inc. (425 South 9 th Avenue)
2005	Cacique Inc., Cott Technologies Inc. (14923 Proctor Avenue), Solo Enterprise Corp (305 South 9 th Avenue)
2010	Los Angeles County Road Maintenance (14959 Proctor Avenue), Mbro Solo Enterprise (305 South 9 th Avenue), Addecoo Employment Svc (360 South 9 th Avenue), Aerosol Services Co. Inc. (425 South 9 th Avenue)
2014	County of Los Angeles (14959 Proctor Avenue), Service Brothers Transports (305 South 9 th Avenue), Beyond Ultimate (360 South 9 th Avenue), Howard C Lim, Rockview Dairies Inc. (425 South 9 th Avenue)

According to the city directory review, the adjacent properties have been occupied by various industrial tenants from 1969 to present, for information regarding tenants identified in the regulatory radius report, refer to Section 4.2.

Copies of reviewed city directories are included in Appendix B of this report.

3.4 Historical Topographic Maps

Partner reviewed historical topographic maps obtained from EDR on September 13, 2021. The following was observed on the subject property and adjacent properties during the topographic map review:

Date: 1894, 1897, 1898, 1904

Subject Property:	Appears to be undeveloped land
Northeast:	Appears to be undeveloped land
Southeast:	Appears to be undeveloped land
Southwest:	Appears to be undeveloped land
Northwest:	Appears to be undeveloped land

Date: 1927

Subject Property: No significant changes depicted
Northeast: Appears to be undeveloped land across Proctor Avenue
Southeast: Appears to be undeveloped land and undeveloped land across South 9th Avenue
Southwest: No significant changes depicted
Northwest: No significant changes depicted

Date: 1953

Subject Property: No significant changes depicted
Northeast: Appears to be developed with small structures across Proctor Avenue
Southeast: No significant changes depicted
Southwest: No significant changes depicted
Northwest: No significant changes depicted

Date: 1966

Subject Property: Appears to be developed with the existing industrial structure, a small structure, and railroad tracks
Northeast: Appears to be developed with a large structure and small structures across Proctor Avenue
Southeast: No significant changes depicted
Southwest: Appears to be undeveloped land across a railroad track
Northwest: No significant changes depicted

Date: 1972, 1981

Subject Property: No significant changes depicted
Northeast: Appears to be developed with two large structures across Proctor Avenue
Southeast: Appears to be undeveloped land and developed with two industrial structures across South 9th Avenue
Southwest: Appears to be developed with a large structure across a railroad track
Northwest: No significant changes depicted

Copies of reviewed topographic maps are included in Appendix B of this report.

4.0 REGULATORY RECORDS REVIEW

4.1 Regulatory Agencies

4.1.1 Health and Fire Department

Regulatory Agency Data

Name of Agency:	Los Angeles County Fire Department- Health and Hazardous Materials Department (LACFD-HHMD)
Agency Address:	1320 North Eastern Avenue, Los Angeles, California
Agency Phone Number:	(323) 881-2411
Date of Contact:	September 14, 2021
Method of Communication:	Online/Email
Summary of Communication:	According to records reviewed, the subject property was inspected from 2014 to 2019. Cacique Inc. received violations regarding training and record keeping. Hazardous materials included a 55-gallon oily absorbent drum, oil and water, nonRCRA hazardous waste solids, three 55-gallon drums of oily water, a 125-gallon used oil AST, a 30-gallon parts washer, a 400-gallon waste oil AST, and three 1-gallon containers and a liter container of waste solvent. For more information regarding the industrial use of the subject property refer to Section 3.0.

4.1.2 Public Works Department

Regulatory Agency Data

Name of Agency:	Los Angeles Department of Public Works (LACDPW)
Agency Address:	900 S. Fremont Avenue, Alhambra, California
Agency Phone Number:	(626) 458-3517
Date of Contact:	September 14, 2021
Method of Communication:	Online (http://www.ladpw.org/epd/cleanla/OpenFileReview.aspx)
Summary of Communication:	According to records reviewed, the subject property identified as Cacique Incorporated at 14940 East Proctor Avenue was identified in the records and discussed below.

The subject property was formerly developed with a 10,000-gallon gasoline UST, a 10,000-gallon diesel UST, a 500-gallon new oil UST (also referred to as a 550-gallon), and a 500-gallon waste oil UST. These USTs were located on the south side of the subject property structure. On June 10, 1990, the 10,000-gallon gasoline UST, 10,000-gallon diesel UST, and 500-gallon new oil UST were removed from the subject property under oversight of Los Angeles County Department of Public Works (LACDPW). Two soil borings were advanced at the inverts of both ends of the fueling USTs and one soil boring was advanced at the central invert of the oil UST. Soil samples were analyzed for TPH and benzene, toluene, ethylbenzene and xylene (BTEX). According to review of analytical results, TPH and BTEX were non-detect in soil samples with exception of a minor concentrations of 57 parts per billion (ppb) of toluene. Based on the results of the sampling, the LACDPW issued a "no further action" designation for the three USTs on July 18, 1990.

In October 1990, the Cacique facility was inspected by the RWQCB due to its past and present chemical storage, handling and disposal practices. The site inspection was required by the U.S. EPA and was

enforced by the RWQCB under the WIP due to the subject property's location within the San Gabriel Valley Area 4 Superfund Site contamination plume, discussed in Section 4.2.

On January 2, 1991, one 500-gallon waste oil UST (also referred to as 550-gallons; i.e., the fourth and last UST reportedly associated with the subject property) was removed from the southern portion of the subject property under the oversight of the LACDPW. A total of four soil samples were collected from the tank excavation. TPH was detected at a maximum concentration of up to 1,950 milligrams per kilogram (mg/kg) below the east end of the tank and 30 micrograms per kilogram ($\mu\text{g}/\text{kg}$) of chloroform were identified in samples collected from the excavation. The chloroform concentration was below the RWQCB's water quality goals of 190 $\mu\text{g}/\text{kg}$ and TPH was characterized as hydraulic oil. However, in February 1991, the RWQCB indicated that the RWQCB was not involved in overseeing the removal of the waste oil UST and the sampling of the soil was not conducted in a fashion acceptable by the RWQCB. The RWQCB suggested that an additional investigation be conducted under their oversight in order to be considered for "case closure". On July 23, 1991, an additional investigation was conducted at the subject property in the vicinity of the former waste oil UST under the oversight of the RWQCB. Samples were collected in the vicinity of the former waste oil UST at 18.5 feet bgs and analyzed for TPH and VOCs. According to the analytical results, all contaminants of concern were non-detect. Based on the results of the investigation and the previous soil sampling results, final closure was requested for the former waste oil UST.

On April 25, 1996, the RWQCB San Gabriel Valley Cleanup Program provided case closure, based on the indication that no vapor degreaser was used onsite and chlorinated VOCs were identified onsite. Based on the UST removal, non-detect to low concentrations identified during soil sampling, and case closure during a time of stringent regulatory oversight, these USTs represent an HREC. Partner recommends no further action or investigation regarding this issue.

4.1.3 Sanitation Department

Regulatory Agency Data

Name of Agency:	Los Angeles County Sanitation Department (LACSD)
Agency Address:	1955 Workman Mill Road, Whittier, California
Agency Phone Number:	(562) 908-4288
Date of Contact:	September 14, 2021
Method of Communication:	Email
Summary of Communication:	According to records reviewed, the subject property identified as Cacique Inc. was identified in the records and discussed below.

Cacique, Inc. has been inspected by LACSD from 1991 to 2021. According to the records, wastewater is discharged to two equalization tanks on the south side of the building. The wastewater gets pumped to a multi-stage clarifier, where pH is adjusted with caustic soda and sulfuric acid. Wastewater is generated from clean-in place (CIP) systems, floor and equipment washing, boiler blowdown, self-regenerating water softener, cooler condensate, and bay washing.

According to the last inspection of the facility in July 2021 the site received a violation for a delinquent specific self-monitoring report (SMR).

4.1.4 Air Pollution Control Agency

Regulatory Agency Data

Name of Agency:	South Coast Air Quality Management District (SCAQMD)
Agency Address:	21865 Copley Drive, Diamond Bar, California
Agency Phone Number:	(909) 396-2000
Date of Contact:	September 14, 2021
Method of Communication:	Online (http://www3.aqmd.gov/webappl/fim/prog/search.aspx)
Summary of Communication:	Records were identified and discussed below.

Cacique Cheese Co. was identified in the records at 14940 Proctor Avenue as permitted to operate an amine treating and a gasoline UST and dispenser in 1986; a natural gas boiler in 1989, 1993, and 2014; a diesel fueled emergency backup generator in 1999 and 2006; and a solvent spray booth and drying oven in 1991. For more information regarding the use of the subject property for industrial operations refer to Section 3.0.

4.1.5 Regional Water Quality Agency

Regulatory Agency Data

Name of Agency:	Regional Water Quality Control Board (RWQCB)
Agency Address:	320 West 4 th Street #200, Los Angeles, California
Agency Phone Number:	(213) 576-6600
Date of Contact:	September 14, 2021
Method of Communication:	Online (https://geotracker.waterboards.ca.gov/)
Summary of Communication:	According to records reviewed, the subject property identified as Cacique, Inc. at 14940 Proctor Avenue was listed for a release of solvents impacting groundwater under the oversight of RWQCB. Based on the overlapping nature of the records with LACDPW, there records are discussed together in Section 4.1.1.

4.1.6 Department of Toxic Substances Control

Regulatory Agency Data

Name of Agency:	California Department of Toxic Substances Control (DTSC)
Agency Address:	9211 Oakdale Avenue, Chatsworth, California
Agency Phone Number:	(818) 717-6500
Date of Contact:	September 14, 2021
Method of Communication:	Online (https://www.envirostor.dtsc.ca.gov/public/ and http://hwts.dtsc.ca.gov/)
Summary of Communication:	No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the DTSC EnviroStor. HWTS listings identified are discussed below:

1 X Cacique Inc. and 1 X Jalisco, John are listed with an inactive permit from 1990 to 2000 under EPA ID CAC000258457, CAC000509568, and CAC000548960; with no manifest records found.

Cacique Inc. is listed as having an active permit under EPA ID CAD070936554 from 1987 to 2021. The site has generated alkaline solution with metals, alkaline solution without metal, unspecified alkaline solution with organic residues less than 10 percent, unspecified aqueous solution, off-specification, aged or

surplus inorganics, other inorganic solid waste, oxygenated solvents, hydrocarbons solvents, unspecified solvent mixture, waste oil and missed oil, unspecified oil-containing waste, latex waste, off-specification aged, or surplus organics, organic liquids with metals, unspecified organic liquid mixture, other organic solids, laboratory waste chemicals, liquids with pH less than or equal to 2, liquids with pH less than or equal to 2 with metals, ignitable waste, corrosives, cadmium, chromium, lead, methyl ethyl ketone, tetrachloroethylene, non-halogenated solvents from 1993 to 2018. PCE was generated from 1999 to 2001 and in 2016. Quantities of PCE ranged 0.015-ton from to 2.436-tons. For more information regarding industrial operations on the subject property, refer to Section 3.0.

4.1.7 Building Department

Regulatory Agency Data

Name of Agency:	Los Angeles County Department of Public Works Building – La Puente Division
Agency Address:	16005 East Central Avenue, La Puente, California
Agency Phone Number:	(626)961-9611
Date of Contact:	September 14, 2021
Method of Communication:	Online/Email
Summary of Communication:	Records were available for review, as further discussed in the following table.

Building Records Reviewed for 14940 East Proctor Avenue and 333 and 342 South 9th Avenue (Subject Property)

Year(s)	Owner/Applicant	Description
1962	Wilson and Co. Inc.	Building permit for a meat processing plant (333 South 9 th Avenue)
1962	Wilson and Co. Inc.	Installation permit for two gasoline USTs south of the building (333 South 9 th Avenue)
1962	Wilson and Co. Inc.	Building permit for storage building (333 South 9 th Avenue)
1963	Wilson and Co. Inc.	Plumbing permit for a sand trap (333 South 9 th Avenue)
1965	Wilson and Co. Inc.	Plumbing permit for a meat processing plant, including an industrial waste unit (333 South 9 th Avenue)
1969	Wilson and Co.	Building permit for office (333 South 9 th Avenue)
1970	Wilson and Co.	Support for burners on roof of meat processing plant (333 South 9 th Avenue)
1973	Wilson and Co. Inc.	Sanitation permit for discharge from meat processing from cleaning machines, cooling tower waste water blow (333 South 9 th Avenue)
1985	Cacique/ Samueleon Bros	Foundation for carbons dioxide tank in rear yard (14940 East Proctor Avenue)
1985	Cacique/ Samueleon Bros	Silo for cheese plant (14940 East Proctor Avenue)
1985	Samueleon Bros	Certificate of Occupancy for silo pad addition (14940 East Proctor Avenue)
1985	Samueleon Bros	Certificate of Occupancy for an office/manufacturing building (14940 East Proctor Avenue)
1987	Cacique Cheese	Cooling tower foundation (14940 East Proctor Avenue)

1992	Cacique Cheese	Building permit addition office and maintenance shop (14940 East Proctor Avenue)
1992	Cacique Cheese Inc.	Automotive spray booth with heated air system (14940 East Proctor Avenue)
1997	Cacique Cheese	Electrical permit (14940 East Proctor Avenue)
2001	Cacique Cheese	Generator tap box project (14940 East Proctor Avenue)
2003	Cacique Cheese	Seismic retrofit (14940 East Proctor Avenue)
2006	Cacique Cheese	Repair wall (14940 East Proctor Avenue)

Various expired permit by Cacique Cheese were also identified in the records in 1996 to 2009.

Records with the building department also included a 1973 industrial discharge permit with Wilson and Co. Inc. at 333 South 9th Avenue. The permit was related to discharges from cleaning machines, cooling tower wastewater, and boiler blow down. The records also included a record of a 6,200-gallon capacity interceptor. For more information regarding these conduits to the subsurface, refer to Section 3.0.

For more information regarding use of former USTs on the subject property refer to Section 4.1.2.

4.1.8 Planning Department

Regulatory Agency Data

Name of Agency:	City of Industry Planning Department (CIPD)
Agency Address:	15625 East Stafford Street, City of Industry, California
Agency Phone Number:	(626) 333-2211
Date of Contact:	September 14, 2021
Method of Communication:	Online (http://www.cityofindustry.org/city-hall/departments/development-services/planning)
Summary of Communication:	According to records reviewed, the subject property is zoned M for industrial development by the City of Industry.

4.1.9 Oil & Gas Exploration

Regulatory Agency Data

Name of Agency:	California Division of Oil, Gas and Geothermal Resources (DOGGR)
Agency Address:	4800 Stockdale Highway, Bakersfield, California 93309
Agency Phone Number:	(916) 322-1080
Date of Contact:	September 14, 2021
Method of Communication:	Online (http://www.conservation.ca.gov/dog)
Summary of Communication:	According to DOGGR, no oil or gas wells are located on or adjacent to the subject property.

4.1.10 Assessor's Office

Regulatory Agency Data

Name of Agency:	Los Angeles County Assessor (LACA)
Agency Address:	500 West Temple Street, Room 225, Los Angeles, California
Agency Phone Number:	(213) 974-3211
Date of Contact:	September 14, 2021
Method of Communication:	Online (https://assessor.lacounty.gov/)
Summary of Communication:	According to records reviewed, the subject property is identified by

Regulatory Agency Data

Assessor Parcel Numbers (APNs) 8208-002-043 and 8208-002-049 and is currently owned by De Cardenas Antonio Trust. The current buildings were constructed in 1962 and 1992 and totals approximately 225,828 square feet on a 7.49 acres lot.

Copies of pertinent documents are included in Appendix B of this report.

4.2 Mapped Database Records Search

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources, Inc. (EDR). Data from governmental agency lists are updated and integrated into one database, which is updated as these data are released. The information contained in this report was compiled from publicly available sources and the locations of the sites are plotted utilizing a geographic information system, which geocodes the site addresses. The accuracy of the geocoded locations is approximately +/-300 feet.

Using the ASTM definition of migration, Partner considers the migration of hazardous substances or petroleum products in any form onto the subject property during the evaluation of each site listed on the radius report, which includes solid, liquid, and vapor.

4.2.1 Regulatory Database Summary

Radius Report Data

Database	Search Radius (mile)	Subject Property	Adjacent Properties	Sites of Concern
Federal NPL or Delisted NPL Site	1.00	N	N	N
Federal CERCLIS Site	0.50	N	Y	N
Federal CERCLIS-NFRAP Site	0.50	N	N	N
Federal RCRA CORRACTS Facility	1.00	N	N	N
Federal RCRA TSD Facility	0.50	N	N	N
Federal RCRA Generators Site (LQG, SQG, CESQG)	0.25	Y	Y	Y
Federal IC/EC Registries	0.50	N	N	N
Federal ERNS Site	Subject Property	N	N	N
State/Tribal Equivalent NPL	1.00	N	N	N
State/Tribal Equivalent CERCLIS	1.00	N	N	N
State/Tribal Landfill/Solid Waste Disposal Site	0.50	N	Y	N
State/Tribal Leaking Storage Tank Site	0.50	Y	Y	Y
State/Tribal Registered Storage Tank Sites (UST/AST)	0.25	Y	Y	Y
State/Tribal Voluntary Cleanup Sites (VCP)	0.50	N	N	N
State/Tribal Spills	0.50	N	N	N
Federal Brownfield Sites	0.50	N	N	N
State Brownfield Sites	0.50	N	N	N
EDR MGP	Varies	N	N	N
EDR US Hist Auto Station	Varies	N	N	N
EDR US Hist Cleaners	Varies	N	N	N

Radius Report Data

Database	Search Radius (mile)	Subject Property	Adjacent Properties	Sites of Concern
Other Listings	Varies	Y	Y	Y

4.2.2 Subject Property Listings

The subject property is identified as a Facility and Manifest Data (HAZNET), CalEPA Regulated Site Portal Data (CERS), Hazardous Waste Tracking System (HWTS), California Hazardous Material Incident Report System (CHMIRS), CalEPA Regulated Site Portal Data Hazardous Waste (CERS HAZ WASTE), Enforcement & Compliance History Information (ECHO), Facility Index System/Facility Registry System (FINDS), Waste Discharge System (WDS), Well Investigation Program Case List (CA WIP), Los Angeles County Street Number List (Los Angeles Co. HMS), Resource Conservation and Recovery Act Non Generator / No Longer Regulated (RCRA NonGen/NLR), Emergency Response Notification Systems (ERNS), Integrated Compliance Information System (ICIS), Risk Management Plan (RMP), Statewide Environmental Evaluation and Planning System UST Listing (SWEEPS UST), Hazardous Waste & Substance Site List (HIST Cortese), Emissions Inventory Data (EMI), California Integrated Water Quality System (CIWQS), National Pollutant Discharge Elimination System (NPDES), Hazardous Substance Storage Container Database (HIST UST), and Leaking Underground Storage Tank Report (LUST) site in the regulatory database report, as discussed below:

- The subject property, identified as Cacique Inc. at 14940 Proctor Avenue, is listed as generating various hazardous materials from 1990 to 2019, for more information refer to Section 4.1.6. The subject property also is listed as having contaminated soil from site clean-up, polymeric resin waste, oil and water separation sludge, and waste oil and mixed oil from 1990 to 1992. For more information regarding a subsurface assessment on the subject property during this time, refer to Section 4.1.2. The subject property has formerly reported air quality emissions data to SCAQMD and is currently an active industrial waste discharger. The subject property is currently inspected by LACFD. A former release of 400-gallons of sodium hydroxide was identified under the oversight of LACFD in 2015. The release is listed as contained. The subject property was a non-generator handler in 1987 from cheese manufacturing, with no violations found, had a risk management plan identified from 1996 to 2019, and has received formal administrative violations. According to the USTs listing the site had a 550-gallon waste oil UST and has a tank removal record with LACDPW. According to the LUST and WIP listings, the site had a release of solvents impacting groundwater and opened under the oversight of RWQCB in 1991. The case was closed in April 25, 1996. For more information regarding UST removal and the LUST case, refer to Section 4.1.2.

The area below is identified as a National Priority List (NPL), Superfund Enterprise Management System (SEMS), United States Engineering Controls (US ENG Controls), Record of Decision (ROD), Potentially Responsible Party (PRP), ICIS, FINDS, ECHO and Area of Concern site in the regulatory database report, as discussed below:

- The property, identified as San Gabriel Valley Area 4 at Stimson Avenue and Old Valley Road, is located within immediate vicinity of the subject property. This site is one of four Superfund sites

in the San Gabriel Valley. The Superfund sites relate to multiple areas of contamination in the San Gabriel Basin aquifer, which is used for purposes that include drinking water. The Superfund sites include areas of soil and groundwater contamination underlying portions of the cities of Alhambra, Arcadia, Azusa, Baldwin Park, Industry, El Monte, La Puente, Monrovia, Rosemead, South El Monte, and West Covina. The San Gabriel Valley covers approximately 170 square miles. Groundwater contamination was first detected in the San Gabriel Valley in 1979. Following this discovery, the California Department of Health Services (CDHS) analyzed water samples collected from water supply wells throughout the Valley to assess the extent of contamination. By 1984, 59 wells were found to be contaminated with volatile organic compounds (VOCs). In the late 1990s, perchlorate and other newly discovered contaminants were detected in the additional water supply and groundwater monitoring wells. In the early 1990s, EPA divided the San Gabriel Valley into eight project areas, including the Puente Valley area. In 1993, EPA identified Potentially Responsible Parties (PRPs) at the site. Currently, the EPA is working with the PRPs on the Remedial Design. The selected remedy includes containment of the contaminated shallow and intermediate groundwater at the mouth of Puente Valley. Cacique Inc., current tenant of the subject property, was listed in the WIP (Well Investigation Program) database and received no further action (NFA) status from the Regional Water Quality Control Board (RWQCB) San Gabriel Valley Cleanup Program. Adjacent and surrounding properties throughout the subject property vicinity were investigated as a part of the San Gabriel Valley Cleanup Program, as discussed in 4.2.3 and 4.2.4.

4.2.3 Adjacent Property Listings

The adjacent properties to the northeast, southeast, southwest, and northwest are identified as a SWEEPS UST, Resources Conservation and Recovery Act Small Quantity Generator (RCRA-SQG), RCRA NonGen/NLR, CERS Haz Waste, HAZNET, NPDES, CERS, HWTS, Hist UST, Spills, Leaks, Investigations and Cleanup Sites (SLIC), LUST, Enforcement Action Listing (ENF), CalEPA Regulated Site Portal Data Tanks (CERS TANKS), CA WIP, Los Angeles Co. HMS, (Manifest), Solid Waste Information System and Active, Closed, and Inactive Landfills (SWF/LF), Aboveground Storage Tank (AST), Underground Storage Tank (UST), EMI, HIST Cortese, Resources Conservation and Recovery Act Large Quantity Generator (RCRA-LQG), Deed Restriction Listing (DEED), and Superfund Enterprise Management System (SEMS) sites in the regulatory database report, as discussed below:

- The property, identified as Le Van Specialty Company Inc. at 14923 East Proctor Avenue, is located approximately 70 feet northeast of the subject property across Proctor Avenue. The site has two inactive USTs onsite and was a large quantity generator in 1981 and small quantity generator in 1996. The site had generated various hazardous materials from 1988 to 1999 and is actively investigated regarding the WIP program. According to release listings and the RWQCB GeoTracker database, the site had a release of VOCs including PCE and trichloroethylene (TCE) impacting groundwater and the RWQCB opened the case on August 11, 1992. From review of an *Additional Phase II Environmental Site Assessment* by SALEM Engineering Group, Inc. dated June 7, 2019, groundwater was encountered at approximately 54 feet bgs and the direction of groundwater flow was to the north-northwest. Sixteen soil borings were advanced at the facility and converted to soil vapor probes at 5 and 15 feet bgs. Total petroleum hydrocarbons (TPH) and VOCs were non-detect in any of the soil samples. Title 22 metals were not detected above

commercial and industrial screening levels. However, PCE was detected at the 5-foot soil vapor samples ranging from 0.17 micrograms per liter ($\mu\text{g/L}$) to 4.4 $\mu\text{g/L}$ and the 15-foot soil vapor samples from 0.32 $\mu\text{g/L}$ to 15 $\mu\text{g/L}$. TCE was detected at 0.17 $\mu\text{g/L}$ at the 15-foot soil vapor sample. SALEM completed a Human Health Risk Assessment (HHRA) using the maximum PCE soil vapor concentration at a depth of 5 feet bgs (4.4 $\mu\text{g/L}$). SALEM concluded that the data suggested that soil and soil vapor at the subject property did not pose a potential risk to human health or the environment. VOCs detected in the groundwater sample collected from MW-1 included PCE at 32 $\mu\text{g/L}$ and TCE at 13 $\mu\text{g/L}$. These concentrations exceeded their respective Maximum Contaminant Levels (MCLs) of 5.0 $\mu\text{g/L}$.

According to an Office of Environmental Health Hazard Assessment (OEHHA) Review Report for the site dated June 14, 2019. The 2019 Additional Phase II Environmental Site Assessment was reviewed by a toxicologist. OEHHA's estimated indoor air concentrations and corresponding cancer risk and non-cancer hazard index exceeded 10^{-5} . The estimate based on samples within the building footprint also exceeded a hazard index of 1. OEHHA's estimates represent potential risks at the site but were noted that they may not be the actual risks experienced by occupants in the on-site building. OEHHA recommended that indoor air sampling would provide more definitive information on potential occupants' VOC exposure. The RWQCB completed a review and evaluation of the information provided and determined that the site has met the RWQCB's requirements for NFA for soils only. However, the RWQCB noted that groundwater quality shall continue to be monitored annually. The impacts of groundwater in the vicinity of the subject property from the San Gabriel Valley Area 4, with PCE and TCE concentrations above MCLs, shallow depth to groundwater in the vicinity of the subject property, and OEHHA evaluation of the adjacent property as an identified potential risk for vapor intrusion, represents a vapor encroachment concern (VEC) for the subject property and a potential vapor intrusion concern cannot be ruled out, which represents a REC.

- The property, identified as Aerosol Services Inc. DBA Kik Aerosol Social LLC/Heartland Industries at 425 South 9th Avenue, is located adjacent to the southwest of the subject property. According to the manifest listing the site generated hazardous waste in 2007. The site maintained a 10,000-gallon gasoline UST, two 12,000-gallon gasoline USTs, and two 5,000-gallon gasoline UST on the site and has reported air quality emissions data to SCAMQD. The site is a large quantity generator from 1999 to 2010 and a non-generator handler in 2020. The site is listed as active on the WIP database. According to the LUST listing and the GeoTracker database, the site was investigated regarding a release of solvents impacting the groundwater in 1990. According to review of a January 15, 2020 Annual Groundwater Monitoring Event Report, two groundwater monitoring wells were sampled and 1,1-DCA, 1,1-DCE, cis-1,2-DCE, TCE, and vinyl chloride were detected a maximum concentration of 1.4 $\mu\text{g/L}$, 1.8 $\mu\text{g/L}$, 4.1 $\mu\text{g/L}$, 3.7 $\mu\text{g/L}$, and 18 $\mu\text{g/L}$. The site is listed as open and under verification monitoring. The site is listed as having VOCs in soil gas exceeding residential standard, but lower than commercial and industrial standard. The site has been remediated via soil vapor extraction, LNAPL removal, and air sparging. The deed restriction restricts the use of the subject property for residential or sensitive uses. For more information

regarding impacted groundwater in the vicinity of the subject property, refer to information regarding the San Gabriel Valley Area 4 Superfund Site discussed above.

- The property, identified as LA Co. Department of Public Works Road Maintenance at 14959 East Proctor Avenue, is located approximately 70 feet northeast of the subject property across Proctor Avenue. The site has a 1,000-gallon gasoline UST, a 1,500-gallon gasoline UST, a 2,000-gallon diesel UST, and a 500-gallon waste oil UST onsite as well as an aboveground petroleum storage tank. The site generated other organic solid waste in 2002 and has been inspected by LACFD. The site is a limited volume transfer operation site of solid waste operations from construction and demolition and a non-disposal site. The site is a non-generator handler of hazardous materials in 1989. Based on the distance from the subject property, lack of evidence of a release, and lack of significant violations found, this listing is unlikely to represent an environmental concern.
- The property, identified as Ultimate Flex at 360 9th Avenue, is located approximately 55 feet southeast of the subject property across South 9th Avenue. The site was identified as a generator from all other waste management service in 1989 and 2013. The site is listed as generating unspecified oil containing waste, unspecified organic liquid mixture, and off-specification, aged, or surplus organics from 2013 to 2019. The site is also an active industrial waste discharger. However, based on the distance from the subject property, lack of evidence of a release, and lack of significant violations found, this listing is unlikely to represent an environmental concern.
- The property, identified as Americold at 14890 East Proctor Avenue, is located adjacent to the northwest of the subject property. According to the RCRA listing the site was a non-generator handler of hazardous materials in 2012. The site has an industrial waste discharge permit as of 2016 from refrigerated warehouse and storage. Based on the lack of evidence of a release, operation during a time of stringent regulatory oversight, and lack of significant violations found, this listing is unlikely to represent an environmental concern.
- The property, identified as Service Bros Transportation/Solo Enterprise Corp at 305 South 9th Avenue, is located adjacent to the southeast of the subject property. According to the RCRA listing the site is a non-generator handler in 2006 and 2009, with no violations found. Based on the lack of evidence of a release, operation during a time of stringent regulatory oversight, and lack of significant violations found, this listing is not expected to represent a significant environmental concern at this time.

Based on the findings, vapor migration is expected to represent a significant environmental concern at this time.

4.2.4 Sites of Concern Listings

The properties to the north, east, east-southeast, and east-northeast are identified as a SWEEPS UST, FIND UST, Hist Cortese, Los Angeles Co. HMS, CIWQS, CERS, CERS HAZ WASTE, CERS TANKS, HAZNET, WDS, HWTS, RCRA Non-Gen NLR, SLIC, Hist UST, WIP, and LUST sites in the regulatory database report, as discussed below:

- The property, identified as Turo Air at 14843 East Proctor Avenue Unit A, is located approximately 165 feet north of the subject property, and situated hydrologically cross-gradient. According to

the SLIC listing and the GeoTracker database, the site had a release of a non-specified contaminant impacting a non-specified media and the case was opened on January 1, 1985. No other information was provided, and the case received closure on March 20, 1998. Based on the case closure, distance from the subject property, and hydrological orientation with respect to the subject property, this listing is unlikely to represent an environmental concern.

- The property, identified as Allied Refrigeration Inc. at 306 South 9th Avenue, is located approximately 245 feet east of the subject property, and situated hydrologically cross-gradient. According to the SLIC listing and the GeoTracker database, the site had a release of a non-specified contaminant impacting a non-specified media and the case was opened on January 1, 1985. No other information was provided, and the case received closure on February 4, 1987. Based on the case closure, distance from the subject property, and hydrological orientation with respect to the subject property, this listing is unlikely to represent an environmental concern.
- The property, identified as GOE Engineering Co. Inc. at 250 South 9th Avenue, is located approximately 400 feet east of the subject property, and situated hydrologically cross-gradient. According to the SLIC listing and the GeoTracker database, the site had a release of a VOCs impacting groundwater and the case was opened on November 22, 1985. The site has been remediated via soil vapor extraction, however, is still listed as under assessment and interim remedial action as of 2015. Based on the regulatory oversight, distance from the subject property, and hydrological orientation with respect to the subject property, this listing is unlikely to represent an environmental concern.
- The property, identified as EW Smith Chemical Company at 15020 Proctor Avenue, is located approximately 430 feet east-southeast of the subject property, and situated hydrologically up-gradient. According to the LUST listing and the GeoTracker database, the site had a release of a solvents impacting groundwater and the case was opened on February 9, 1992. Soil, soil gas, and groundwater were assessed, and the site received case closure on May 31, 1995. Based on the case closure and distance from the subject property, this listing is unlikely to represent an environmental concern.
- The property, identified as Overton Laboratories Inc./Linda Gale Inc. at 230 South 9th Avenue, is located approximately 485 feet east-north east of the subject property, and situated hydrologically cross-gradient. According to the SLIC listing and the GeoTracker database, the site had a release of an unspecified contaminant impacting an unspecified media and the case was opened on January 1, 1985. No other information was provided, and the case was closed on June 5, 1986. An additional release of VOCs impacting groundwater was identified and the case was opened on October 5, 1989 by the RWQCB. The site has been remediated via soil vapor extraction and the site is listed as open regarding assessment and interim remedial action as of October 29, 2015. Based on the regulatory oversight, distance from the subject property, and hydrological orientation with respect to the subject property, this listing is unlikely to represent an environmental concern.

4.2.5 Orphan Listings

No orphan listings of concern are identified in the regulatory database report.

A copy of the regulatory database report is included in Appendix C of this report.

5.0 USER PROVIDED INFORMATION AND INTERVIEWS

In order to qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the *Brownfields Amendments*), the *User* must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. The *User* should provide the following information to the *environmental professional*. Failure to provide this information could result in a determination that *all appropriate inquiries* is not complete. The *User* is asked to provide information or knowledge of the following:

- Review Title and Judicial Records for Environmental Liens and AULs
- Specialized Knowledge or Experience of the User
- Actual Knowledge of the User
- Reason for Significantly Lower Purchase Price
- Commonly Known or *Reasonably Ascertainable* information
- Degree of Obviousness
- Reason for Preparation of this Phase I ESA

Fulfillment of these user responsibilities is key to qualification for the identified defenses to CERCLA liability. Partner requested our Client to provide information to satisfy User Responsibilities as identified in Section 6 of the ASTM guidance.

Pursuant to ASTM E1527-13, Partner requested the following site information from Rexford Industrial Realty, L.P. (User of this report).

User Responsibilities

Item	Provided By User	Not Provided By User	Discussed Below	Does Not Apply
AAI User Questionnaire			X	
Title Records, Environmental Liens, and AULs			X	
Specialized Knowledge			X	
Actual Knowledge			X	
Valuation Reduction for Environmental Issues			X	
Identification of Key Site Manager	Section 5.1.3			
Reason for Performing Phase I ESA	Section 1.1			
Prior Environmental Reports			X	
Other		X		

5.1 Interviews

5.1.1 Interview with Owner

The owner of the subject property, identified as De Cardenas Antonio Trust, was not available to be interviewed at the time of the assessment. The lack of this information does not represent a significant data gap.

5.1.2 Interview with Report User

Mr. James Hwang, report user, was not aware of any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

5.1.3 Interview with Key Site Manager

Mr. Mark Heidlage, key site manager, indicated that he had no information pertaining to any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

5.1.4 Interviews with Past Owners, Operators and Occupants

Interviews with past owners, operators and occupants were not conducted since information regarding the potential for contamination at the subject property was obtained from other sources.

5.1.5 Interview with Others

As the subject property is not an abandoned property as defined in ASTM 1527-13, interview with others were not performed.

5.2 User Provided Information

5.2.1 Title Records, Environmental Liens, and AULs

Partner was not provided with title records or environmental lien and AUL information for review as part of this assessment.

5.2.2 Specialized Knowledge

No specialized knowledge of environmental conditions associated with the subject property was provided by the User at the time of the assessment.

5.2.3 Actual Knowledge of the User

No actual knowledge of any environmental lien or AULs encumbering the subject property or in connection with the subject property was provided by the User at the time of the assessment.

5.2.4 Valuation Reduction for Environmental Issues

No knowledge of valuation reductions associated with the subject property was provided by the User at the time of the assessment.

5.2.5 Commonly Known or Reasonably Ascertainable Information

The User did not provide information that is commonly known or *reasonably ascertainable* within the local community about the subject property at the time of the assessment.

5.2.6 Previous Reports and Other Provided Documentation

The following information was provided to Partner for review during the course of this assessment:

Phase I Environmental Site Assessment Food Processing Facility 14940 East Proctor Avenue and 342 South 9th Avenue, City of Industry, CA, SALEM Engineering Group, Inc. (May 19, 2021)

SALEM Engineering Group, Inc. (SALEM) prepared this report on behalf of De Cardenas Group, APLC. The assessment was performed in accordance with ASTM Standard E1527-13. The assessment consisted of a site reconnaissance, interviews with knowledgeable personnel, review of historical information, a review of federal, state and local regulatory databases. Pertinent information contained in this report is summarized below:

- At the time of the 2021 assessment, the subject property was occupied by a food processing building, a maintenance building, as well as a maintenance shop building and associated paved parking and storage areas occupied by Cacique, Inc.
- According to SALEM, the subject property was formerly developed with agricultural land as early as 1928. The food processing building, and maintenance building were constructed in 1962 and the maintenance shop building was constructed in 1992. Tenants of the subject property have included Cacique Cheese Company (1987-2014).
- At the time of site reconnaissance, SALEM observed a 400-gallon waste oil AST, six 55-gallon drums of motor oil, a 55-gallon drum of used oil filters, and four 5-gallon containers of new motor oil located in the hazardous materials storage area. The oils were observed on secondary containment and disposed of by Safety-Kleen. One 35-gallon solvent-based parts washer was observed near the maintenance shop building and disposed of by Safety-Kleen.
- A 1,000-gallon diesel belly tank backup generator and a 500-gallon diesel belly tank backup generator were observed on the subject property in good condition.
- One propane tank was observed on the western side of the subject property for forklift fuel and observed in good condition.
- An aboveground grease interceptor used for storage of used food-grade oil/grease from food processing was observed adjacent to the northeast of the food processing building. The grease is pumped by an off-site contractor on an as needed basis and is tested by Test America Environmental Testing, Inc.
- One hydraulic elevator was observed in the maintenance shop building and serviced by Thyssen-Krupp.
- Approximately 25 ASTs of milk, carbon dioxide, water, ammonia, animal feed, lactose, whey, dairy cream, cow water and fruit prep liquids were observed on the southern portion of the subject property for food processing activities. The ASTs utilized secondary containment.

- According to records reviewed with building department and assessor's information, the facility building was constructed in 1962 and the maintenance shop building was constructed in 1992.
- No records were identified for the subject property with DTSC, DOGGR, SCAQMD, and LACFD.
- According to records with the LACSD, Cacique, Inc. is permitted for an industrial waste discharge permit related to an aboveground clarifier and food processing is monitored prior to discharge to the storm water drainage system. No open violations or notices to comply were identified in the records.
- According to records reviewed with the RWQCB, an unauthorized release of solvents impacting soil occurred at the Cacique, Inc. facility in January 1991 during the removal of three USTs. The soil was excavated under the regulatory agency oversight of LACDPW and a "Case Closed" designation was issued on February 15, 1994. However, since the subject property was located in an area identified as the PVOU of San Gabriel Valley (Area 4) regional groundwater contamination plume, the RWQCB had to determine whether the subject property had been a contributor to the regional groundwater contamination prior to being issued a "case closed" designation. After review of the closure documentation and subsequent inspections of the subject property, the RWQCB concurred with the LACDPW and issued a "No Further Action" designation to the Cacique, Inc. facility on April 25, 1996. The former incident represented a HREC in connection with the subject property.
- Additionally, the RWQCB maintained information regarding a release at 14923 East Proctor Avenue. According to the records, the former Cacique, Inc. facility was located adjoining to the northeast and cross-gradient of the subject property, was identified as a potential contributor to the regional groundwater contamination plume identified as the PVOU of San Gabriel Valley (Area 4) designated by the U.S. EPA as a NPL site under the CERCLA and was included in the RWQCB's WIP. Several soil, soil vapor, and groundwater investigations have been performed at the site since 1992. Areas of concern at the site included the locations of the clarifier, the four-stage washer, the former strip tanks and the underground storage tanks. Multiple environmental site assessments have determined that the soil and groundwater beneath the site had been impacted by VOCs, including PCE and TCE. This site is listed as "Open – Assessment & Interim Remedial Action" as of January 17, 1995. However, on December 21, 2020, the RWQCB issued a letter indicating that "no further action" was required for the "soils only" at the former Cacique, Inc. facility. Confirmation soil, soil vapor, groundwater and indoor air samples collected at the site indicate that the subsurface soil at the site has been adequately assessed and remaining concentrations of soil and soil vapor do not pose a threat to human health or groundwater quality. Residual contamination remains on the site, but meets the criteria set forth in Title 15, section 2550.4 of the California Code of Regulations. Soil and soil vapor located at the Site do not pose a threat to human health or the environment, as indicated in the human health risk assessment (HHRA). According to the RWQCB, the current concentrations of PCE and TCE in groundwater exceed the established maximum contaminant level of 5.0 µg/L for PCE and TCE therefore, groundwater quality shall continue to be monitored annually. Based upon various influencing factors including data generated from the previous assessments of the site, as well as

the cross-gradient location of the former Cacique, Inc. facility, the former Cacique, Inc. facility is deemed to have a low potential to environmentally impact the subject property and therefore, does not present a REC to the subject property.

- According to records with LACDPW, on June 10, 1990, three USTs were removed from the subject property. One 10,000-gallon gasoline UST; one 10,000-gallon diesel UST; and one 500-gallon new oil UST were removed from the southern portion of the subject property under the oversight of the LACDPW. Five soil samples were collected and analyzed for COCs. Laboratory results indicated that minor concentrations of toluene (up to 57 ppb) were identified in the soil. Based on the results of the sampling, the LACDPW issued a “no further action” designation for the three USTs on July 18, 1990. Additionally, in October 1990, the Cacique facility was inspected by the RWQCB due to its past and present chemical storage, handling and disposal practices. The site inspection was required by the U.S. EPA and was enforced by the RWQCB under the WIP due to the subject property’s location within the San Gabriel Valley (Area 4) contamination plume. On January 2, 1991, one 500-gallon waste oil UST was removed from the southern portion of the subject property under the supervision of the LACDPW. A total of four soil samples were collected from the tank excavation. TPH concentrations of up to 1,950 mg/kg were detected in the soil below the east end of the tank. Additionally, minor concentrations of chloroform were identified in samples collected from the excavation. Further analysis of the sample determined that the TPH was characterized as hydraulic oil. While the identification of the hydraulic oil was determined to be associated with the contents of the former UST, the source of the chloroform was undetermined. However, the identified chloroform concentrations (30 µg/kg) were below the RWQCB’s water quality goals of 190 µg/kg. Based on the results of the sampling, final closure for the removal of the waste oil UST was recommended. However, in February 1991, the RWQCB indicated that the Board was not involved in overseeing the removal of the waste oil UST and the sampling of the soil was not conducted in a fashion acceptable by the RWQCB. The RWQCB suggested that an additional investigation be conducted under the oversight of the Board in order to be considered for “case closure”. On July 23, 1991, an additional investigation was conducted at the subject property in the vicinity of the former waste oil UST under the oversight of the RWQCB. Samples were collected in the vicinity of the former UST location and analyzed for TPH, halogenated solvents and aromatic volatile organics. None of the COCs were identified in any of the three samples analyzed. Based on the results of the investigation and the previous soil sampling results, final closure was requested for the former waste oil UST. On February 15, 1994, the LACDPW indicated that based on the results of the January 1991 closure report, the LACDPW had determined that the closure requirements for the removal of the waste oil UST had been met. However, the LACDPW indicated that the RWQCB was the lead agency and would have to make the final determination for case closure. After reviewing the information and inspecting the site, the RWQCB determined that “no further action” was required pertaining to the San Gabriel Valley Cleanup Program and issued a “no further action” designation on April 25, 1996. SALEM identified these former USTs as HRECs.
- The subject property is located within a region of known groundwater contamination designated by the U.S. EPA as a NPL site. The San Gabriel Valley has been the subject of environmental

investigation since 1979 when groundwater contaminated with VOCs was first identified. In May 1984, four broad areas of contamination within the San Gabriel Basin were listed as San Gabriel Areas 1 through 4 on the NPL. The San Gabriel Valley (Area 4) comprises a contaminated groundwater plume that runs along the axis of the San Jose Creek within the San Gabriel Valley groundwater basin in La Puente. The contaminated groundwater plume is approximately one-mile-long and approximately one-mile-wide. The groundwater is contaminated with VOCs including TCE and PCE. The U.S. EPA subsequently divided the Basin into eight OUs to provide a means of describing hydrogeology and contaminant distribution, as well as planning remedial activities. The subject property is located within the western portion of the PVOU which is located within the southeastern portion of the San Gabriel Valley. In July 2015, SALEM performed human health risk modeling on an adjoining property (former Cacique, Inc. facility at 14923 East Proctor Avenue) using data gathered during a December 2002 soil vapor assessment and OEHHA vapor intrusion protocol and determined that existing site conditions did not represent an undue risk to future commercial/industrial building occupants. SALEM concluded that no additional vapor assessment was necessary. Based upon the results of SALEM's Tier 1 VES, it is SALEM's opinion that a potential VEC "likely does not exist" at the subject property. As such, no further assessment is recommended.

- SALEM reviewed a previous Phase I Environmental Site Assessment Food Processing Facility 14940 East Proctor Avenue, City of Industry, California by SALEM dated July 1, 2020. Historical and regulatory information as well as onsite observations, conclusions, and recommendations from this report have been reflected in the 2021 SALEM report discussed above.

SALEM identified the location of the subject property within the San Gabriel Valley Superfund Site (Area 4) as a REC. However, based on a Human Health Risk Assessment completed by SALEM in 2015 for an adjacent site in 2015 the potential vapor encroachment condition likely does not exist at the subject property and SALEM recommended no further investigation.

Partner independently reviewed of information on the GeoTracker database regarding the release case identified as Le Van Specialty Company Inc. at 14923 East Proctor Avenue. The 2019 Additional Phase II Environmental Site Assessment at this adjacent site was reviewed by a toxicologist under direction of the RWQCB. According to an Office of Environmental Health Hazard Assessment (OEHHA) Review Report for the site dated June 14, 2019, OEHHA's estimated indoor air concentrations and corresponding cancer risk and non-cancer hazard index exceeded 10-5. The estimate based on samples within the building footprint also exceeded a hazard index of 1. OEHHA's estimates represent potential risks at the site but were noted that they may not be the actual risks experienced by occupants in the on-site building. OEHHA recommended that indoor air sampling would provide more definitive information on potential occupants' VOC exposure. Based on the OEHHA's estimated potential cancer and non-cancer risk exceedances and OEHHA's recommendations of additional indoor air sampling, Partner disagrees with the conclusions of this 2021 Phase I ESA report and the adjacent site at 14923 East Proctor Avenue represents a concern as discussed in Section 4.2.3.

Monthly Dry Weather Visual Observation, Christopher Adkinson/Megan Geer (April 15, 2021)

The report was provided by Cacique Inc. for review. According to the inspection, a leak in the heat exchanger on the roof had filled the drip pan, algae build up was identified near the heat exchanger, the backflow preventer and gasket had leaks near ammonia tank, the silo chemicals had small leaks in the weep holes, and an oily sheen was noted in the stormwater trench and sump. The report recommended equipment maintenance and sump pump vacuuming.

Copies of pertinent pages reviewed are included in Appendix B of this report.

6.0 SITE RECONNAISSANCE

The weather at the time of the site visit was sunny and clear. Refer to Section 1.5 for limitations encountered during the field reconnaissance and Sections 2.1 and 2.2 for subject property operations. The table below provides the site assessment details:

Site Assessment Data

Site Assessment Performed By: Chloe Adelman
Site Assessment Conducted On: September 20, 2021

The table below provides the subject property personnel interviewed during the field reconnaissance:

Site Visit Personnel for 14940 East Proctor Avenue and 342 South 9th Avenue (Subject Property)

Name	Title/Role	Contact Number	Site Walk* Yes/No
Mr. Mark Heidlage	Key Site Manager	(806) 717-6453	Yes

* Accompanied Partner during the field reconnaissance activities and provided information pertaining to the current operations and maintenance of the subject property

Environmental concerns were identified during the onsite reconnaissance related to current/former USTs, the storage, use, and generation of hazardous substances, signs of a release, indications of former subsurface investigations, etc., as further discussed in Sections 6.1 and 6.2.

6.1 General Site Characteristics

6.1.1 Solid Waste Disposal

Solid waste generated at the subject property is disposed of in commercial dumpsters located in the parking lot on the subject property. An independent solid waste disposal contractor removes solid waste from the subject property. According to property personnel, only office trash is collected in the on-site solid waste dumpsters.

6.1.2 Sewage Discharge and Disposal

Sanitary discharges on the subject property are directed into the municipal sanitary sewer system. The City of Industry services the subject property vicinity. No septic systems were observed or reported on the subject property. However, a wastewater treatment facility is located on the subject property to treat water discharges from cheese manufacturing. Additionally, an aboveground clarifier was observed on the subject property to collect food grade grease prior to discharging to the storm water sewer system. Industrial discharged water is sampled by LACSD as discussed in Section 4.1.

6.1.3 Surface Water Drainage

Storm water is removed from the subject property primarily by sheet flow action across the paved surfaces towards storm water drains located throughout the subject property. Site storm water from roofs, landscaped areas, and paved areas is directed to on-site concrete swales and drains, which drain to the subject property wastewater treatment tanks and the aboveground clarifier prior to discharge to the public right of way. The subject property is connected to a municipal owned and maintained sewer system.

The subject property does not appear to be a designated wetland area, based on information obtained from the United States Fish & Wildlife Service (USFWS); however, a comprehensive wetlands survey would be required in order to formally determine actual wetlands on the subject property. No surface impoundments, wetlands, natural catch basins, settling ponds, or lagoons are located on the subject property. No drywells were identified on the subject property.

6.1.4 Source of Heating and Cooling

Heating and cooling systems as well as domestic hot water equipment are fueled by electricity and natural gas provided by City of Industry Public Utilities Commission (IPUC) and The Gas Company, respectively.

6.1.5 Wells and Cisterns

No aboveground evidence of wells or cisterns was observed during the site reconnaissance.

6.1.6 Wastewater

Domestic wastewater generated at the subject property is disposed by means of the sanitary sewer system via the use of a wastewater treatment system and discussed in Section 4.1.11.

6.1.7 Septic Systems

No septic systems were observed or reported on the subject property.

6.1.8 Additional Site Observations

No additional general site characteristics were observed during the site reconnaissance.

6.2 Potential Environmental Hazards

6.2.1 Hazardous Substances and Petroleum Products Used or Stored at the Site

Partner identified hazardous substances used, stored, and/or generated on the subject property as noted in the following table:

Hazardous Substances and/or Petroleum Products Noted Onsite				
Substance	Container Size	Location	Nature of Use	Disposal Method
Lubricant oil	5 x 55-gallon drum and 4 x 5-gallon containers	Hazardous Materials Storage Area	Line Maintenance	NA
Waste Oil	3 x 55-gallon drums	Hazardous Materials Storage Area	Line Maintenance	Transported off-site by Safety-Kleen
Used filters, rags, absorbent material	1 x 55-gallon drums	Hazardous Materials Storage Area	Line Maintenance	Transported off-site by Safety-Kleen
Paints	Various 5-gallon cans	Maintenance Area	Routine Maintenance	NA
Solvent Parts Washer	1 x 35-gallon parts washer	East side of facility	Line Maintenance	Transported off-site by Safety-Kleen
Glycol	25 x 55-gallon	Hazardous	Line	NA

Hazardous Substances and/or Petroleum Products Noted Onsite

Substance	Container Size	Location	Nature of Use	Disposal Method
Inhibitors, Sodium Hydroxide, Food Grade Sanitizers, Alkaline Foam Cleaners, Perafoam Cleaner	drums	Materials Storage Area	Maintenance	
Vacuum Pump Oil	2 x 250-gallon totes	Southeast of building	Property Maintenance	Transported off-site by Safety-Kleen

According to Cacique, Inc. the following hazardous materials were identified in quantities greater than 55-gallons and listed in safety data sheets (SDS): Enviroguard (Hydrogen Peroxide), F-333 (Dipropylene Glycol Methyl Ether), F-364 Liquid Chlorinated Alkaline CleanerHDA2500, HLC 500 Chemchlor Sodium Hypochlorite 12.5, Lime-Sol Soap Detergent, Q-ROAC Sodium Acetate, Q-ROBC (Sodium Hydroxide) F-29 Surface Sanitizer, Acidifoam Foaming Acid Cleaner, Hand San, 66Baume Sulfuric Acid, Carbon Dioxide, Ammonia (Anhydrous), Waste Oil, Nitrogen, SG-2800P (Potassium Hydroxide Liquid), BACC Stop 3A IPA 70% (Hand Sanitizer), propane, F-20 (Isopropanol), F-126 (Tetrassodium EDTA), Sterilix Ultra Disinfectant Cleaner Solution 1, Sterilix Ultra Activator Solution, Sulfuric Acid 35%, and Ethanol.

The following chemicals were also utilized onsite, but not identified in SDS tenant inventories: Perafoam, BFW-4500S (Water Treatment), OS-4001S (Water Treatment), RLT-5100S (Water Treatment), Alk-1000S (Water Treatment), CS-2200S (Water Treatment), Durocide C-100G (Biocide), Duroklor 56 (Water Treatment), Sumpbuddy (Antimicrobial Time Release Tablets), 50% Sodium Hydroxide, CLT-407 (Pitting and Corrosive Inhibitor), Enhance O2 (Hydrogen Peroxide), Biocide HS 15%, Q-ROWA (Reverse Osmosis Membrane Cleaner), and Q-ROEC (Reverse Osmosis Membrane Cleaner).

The materials were found to be properly labeled and stored at the time of the assessment with no signs of leaks, stains, or spills. Secondary containment is provided. Based on the nature of use, presence of secondary containment, and lack of violations on-file with the local fire department, these materials are unlikely to represent an environmental concern.

6.2.2 Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs/USTs)

No evidence of current or former USTs was observed during the site reconnaissance.

Partner observed approximately 38 aboveground storage tanks (ASTs)/silos for the storage of milk, carbons dioxide, water, ammonia, animal feed, lactose, whey, dairy cream, cow water, fruit prep liquids, and clean-in place (CIP) system good grade cleaners were observed on the south and west side of the subject property for cheese manufacturing operations. five 300-gallon ASTs or sulfuric acid, sodium hydroxide, and hydrochloric acid were observed on the north and west portion of the subject property. The ASTs are used for pH control associated with the wastewater treatment system. Based on the good condition of the ASTs/silos, food grade nature of the content, use of secondary containment, and lack of

violations identified in the regulatory records, the ASTs are unlikely to represent an environmental concern.

A 500-gallon diesel fueled belly tank backup generator and a 1,000-gallon diesel fueled belly tank backup generator were observed on the southeast portion of the subject property. The generators were observed in good condition and the belly tank was located in secondary containment. Based on the good condition of the generators, use of secondary containment, and lack of violations identified in the regulatory records, the backup generators are unlikely to represent an environmental concern.

An approximately 400-gallon propane AST was observed on the southwest portion of the subject property. The AST is used for forklift fuel and appeared to be in good condition. Based on the good condition and nature of the content as gas, which would naturally dissipate to the ambient air if a leak were to occur, this AST is unlikely to represent an environmental concern.

6.2.3 Evidence of Releases

No spills, stains or other indications that a surficial release has occurred at the subject property were observed.

6.2.4 Polychlorinated Biphenyls (PCBs)

Older transformers and other electrical equipment could contain PCBs at a level that subjects them to regulation by the U.S. EPA. PCBs in electrical equipment are controlled by United States Environmental Protection Agency regulations 40 CFR, Part 761. Under the regulations, there are three categories into which electrical equipment can be classified: 1) Less than 50 parts per million (ppm) of PCBs – “Non-PCB;” 2) 50 ppm-500 ppm – “PCB-Contaminated;” and, 3) Greater than 500 ppm – “PCB-Containing.” The manufacture, process, or distribution in commerce or use of any PCB in any manner other than in a totally enclosed manner was prohibited after July 2, 1979.

The on-site reconnaissance addressed indoor and outdoor transformers that may contain PCBs. Three pad-mounted transformers were observed on the subject property. The transformers are not labeled indicating PCB content. No staining or leakage was observed in the vicinity of the transformers. IPUC maintains ownership and operational responsibility for the transformers. Based on the good condition of the equipment, the transformers are not expected to represent a significant environmental concern.

The subject property is developed with a hydraulic trash compactor. The compactor was observed in good condition with no leaking or staining in the vicinity. Based on the good condition of the compactor it is not expected to represent a significant environmental concern for the subject property.

The subject property is developed with one hydraulic elevator. The elevator equipment was observed to be in good condition with no leaking or staining in the vicinity and reportedly maintained by an off-site contractor on an as needed basis. Based on the good condition of the elevator equipment, this elevator is unlikely to represent an environmental concern.

Additionally, no other potential PCB-containing equipment (interior transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, balers, etc.) was observed on the subject property during Partner’s reconnaissance.

6.2.5 Strong, Pungent or Noxious Odors

No strong, pungent or noxious odors were evident during the site reconnaissance.

6.2.6 Pools of Liquid

No pools of liquid were observed on the subject property during the site reconnaissance.

6.2.7 Drains, Sumps and Clarifiers

Partner observed the following drains, sumps, and/or clarifiers located on the subject property:

Drains, Sumps, and Clarifiers Observed Onsite			
Number Observed:	Floor Drain(s) Various	Sump(s) Two	Clarifier(s) One
Location:	Manufacturing building and south exterior loading zone	East of the hazardous materials storage area and south side of berm in exterior loading zone	North of the manufacturing building
Point of Discharge:	Sanitary Sewer	Sanitary Sewer	Sanitary Sewer
Sealed/Bermed:	NA	NA	NA

The sumps were installed in unspecified dates and reportedly discharge stormwater from this area of the subject property to the public right of way. According to the site contact, stormwater from these areas is separated off from manufacturing and loading dock operations and is permitted to flow to the sanitary sewer system without treatment.

The subject property interior drains and sumps inside of the berm in the loading dock flow to the wastewater treatment system and aboveground clarifier. The clarifier is reportedly used to separate out food grade waste and is routinely sampled and pumped. Prior to discharge into the sanitary sewer system the wastewater pH is sampled and adjusted. An additional wastewater discharge sampling area is located north of the clarifier. According to the site contact, LACSD samples wastewater at a sampling point in this area routinely. For more information regarding use of a clarifier onsite, refer to Section 3.0.

6.2.8 Pits, Ponds and Lagoons

No pits, ponds or lagoons were observed on the subject property.

6.2.9 Stressed Vegetation

No stressed vegetation was observed on the subject property.

6.2.10 Additional Potential Environmental Hazards

No additional environmental hazards, including landfill activities or radiological hazards, were observed.

6.3 Non-ASTM Services

6.3.1 Asbestos-Containing Materials (ACMs)

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos, for purposes of this regulation. All thermal

system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building that have not been appropriately tested are "presumed asbestos-containing material" (PACM).

The subject property buildings were constructed in 1962 and 1992. A limited, visual evaluation of accessible areas for the presence of suspect ACMs at the subject property was conducted. The objective of this visual survey was to note the presence and condition of suspect ACM observed. Please refer to the table below for identified suspect ACMs:

Suspect ACMs			
Suspect ACM	Location	Friable Yes/No	Physical Condition
Drywall Systems	Throughout Building Interior	No	Good
Floor Tiles	Throughout Building Interior	No	Good
Floor Tile Mastic	Throughout Building Interior	No	Good
Carpet Mastic	Throughout Building Interior	No	Good
	Office		
Drop Tile Ceiling Panels	Throughout Building Interior	Yes	Good
	Office		

The limited visual survey consisted of noting observable materials (materials which were readily accessible and visible during the course of the site reconnaissance) that are commonly known to potentially contain asbestos. This activity was not designed to discover all sources of suspect ACM, PACM, or asbestos at the site; or to comply with any regulations and/or laws relative to planned disturbance of building materials such as renovation or demolition, or any other regulatory purpose. Rather, it is intended to give the User an indication if significant (significant due to quantity, accessibility, or condition) potential sources of ACM or PACM are present at the subject property. Additional sampling, assessment, and evaluation will be warranted for any other use.

Partner was not provided building plans or specifications for review, which may have been useful in determining areas likely to have used ACM.

According to the US EPA, ACM and PACM that is intact and in good condition can, in general, be managed safely in-place under an Operations and Maintenance (O&M) Program until removal is dictated by renovation, demolition, or deteriorating material condition. Prior to any disturbance of the construction materials within this facility, a comprehensive ACM survey is recommended.

6.3.2 Lead-Based Paint (LBP)

Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (or 5,000 ug/g or 0.5% by weight) or more of lead. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as "Title X", to protect families from exposure to lead from paint, dust, and soil. Under Section 1017 of Title X, intact LBP on most walls and ceilings is not considered a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. Further, Section 1018 of this law directed the Housing and Urban Development (HUD) and the US EPA to require the disclosure of known information on LBP and LBP hazards before the sale or lease of most housing built before 1978.

Based on the age of the subject property buildings (pre-1978), there is a potential that LBP is present. Interior and exterior painted surfaces were observed in good condition and therefore not expected to represent a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated.

Actual material samples would need to be collected in order to determine if LBP is present.

6.3.3 Radon

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the table below:

EPA Radon Zones		
EPA Zones	Average Predicted Radon Levels	Potential
Zone 1	Exceed 4.0 pCi/L	Highest
Zone 2	Between 2.0 and 4.0 pCi/L	Moderate
Zone 3	Less than 2.0 pCi/L	Low

It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the US EPA recommends site-specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not conducted as part of this assessment. Review of the US EPA Map of Radon Zones places the subject property in Zone 2. Based upon the radon zone classification, radon is unlikely to represent an environmental concern.

6.3.4 Lead in Drinking Water

According to available information, a public water system operated by the San Gabriel Valley Water Company serves the subject property vicinity. The source of public water for the City of Industry is the groundwater from a natural underground aquifer. According to the City of Industry and the 2020 Annual Water Quality Report, water supplied to the subject property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper. Water sampling was not conducted to verify water quality.

6.3.5 Mold

Molds are microscopic organisms found virtually everywhere, indoors and outdoors. Mold will grow and multiply under the right conditions, needing only sufficient moisture (in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding).

Partner observed accessible, interior areas for the subject property buildings for significant evidence of mold growth with the exceptions detailed in Section 1.5 of this report; however, this ESA should not be used as a mold survey or inspection. Additionally, this limited assessment was not designed to assess all areas of potential mold growth that may be affected by mold growth on the subject property. Rather, it is

intended to give the client an indication as to whether or not conspicuous (based on observed areas) mold growth is present at the subject property. This evaluation did not include a review of pipe chases, mechanical systems, or areas behind enclosed walls and ceilings.

No obvious indications of water damage or mold growth were observed during Partner's visual assessment.

6.4 Adjacent Property Reconnaissance

The adjacent property reconnaissance consisted of observing the adjacent properties from the subject property premises. No items of environmental concern were identified on the adjacent properties during the site assessment, including hazardous substances, petroleum products, ASTs, USTs, evidence of releases, PCBs, strong or noxious odors, pools of liquids, sumps or clarifiers, pits or lagoons, stressed vegetation, or any other potential environmental hazards.

7.0 FINDINGS AND CONCLUSIONS

Findings

A *recognized environmental condition (REC)* refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The following was identified during the course of this assessment:

- **Historical Industrial Use.** The subject property was developed for industrial food and meat processing and manufacturing in 1962. The subject property was documented as formerly conducting truck maintenance and fueling onsite and currently utilizes a maintenance shop for equipment line upkeep. Industrial operations of this nature commonly use conduits to the subsurface such as sumps, clarifiers/sand traps, drains, and underground storage tanks (USTs) and may also involve the use of solvent parts washers and solvent spray booths. From regulatory records and onsite observations, the site has been developed with sumps and a clarifier (also referred to as a sand trap). The clarifier and sump represent the potential for impacts to the subsurface of the subject property. According to onsite observations, the current clarifier in use is aboveground; however, no information was available regarding a former sand trap clarifier, which was reportedly installed in 1963, based on building permits for the subject property. Also, according to regulatory records, an automotive spray booth was identified on the subject property in 1991. This spray booth was not observed during site reconnaissance and the location of the spray booth was not provided in the records. A solvent parts washer was observed during site reconnaissance on the east side of the subject property. According to a review of manifest records, the subject property was noted as generating tetrachloroethylene (PCE) from 1999 to 2001 and in 2016. Quantities of PCE ranged 0.015-ton from to 2.436-tons. Chlorinated solvents such as PCE, even when properly stored and handled, often migrate into the subsurface as a result of small releases associated with onsite operations. Additionally, chlorinated solvents are highly mobile chemicals that can easily accumulate in soil and migrate to groundwater beneath a facility. Furthermore, historical hazardous substance storage, use and disposal practices at the subject property are unknown, particularly in connection with the reported former sand trap. Based on the long-term use of the subject property for manufacturing operations, identified use of petroleum products and chlorinated solvents onsite, and identified conduits to the subsurface, the former and current industrial use of the subject property represents a REC.
- **San Gabriel Valley Area 4 Superfund Site.** The subject property is located in the vicinity of the San Gabriel Valley Area 4 Superfund Site. This site is one of four Superfund sites in the San Gabriel Valley. The Superfund sites relate to multiple areas of contamination in the San Gabriel Basin aquifer, which is used for purposes that include drinking water. The Superfund sites include areas of soil and groundwater contamination underlying portions of the cities of Alhambra, Arcadia, Azusa, Baldwin Park, Industry, El Monte, La Puente, Monrovia, Rosemead, South El Monte, and West Covina. The San Gabriel Valley covers approximately 170 square miles. Groundwater contamination was first detected in the San Gabriel Valley in 1979. Following this discovery, the California Department of Health Services (CDHS) analyzed water samples collected from water

supply wells throughout the Valley to assess the extent of contamination. By 1984, 59 wells were found to be contaminated with volatile organic compounds (VOCs). In the late 1990s, perchlorate and other newly discovered contaminants were detected in the additional water supply and groundwater monitoring wells. In the early 1990s, EPA divided the San Gabriel Valley into eight project areas, including the Puente Valley area. In 1993, EPA identified Potentially Responsible Parties (PRPs) at the site. Currently, the EPA is working with the PRPs on the Remedial Design. The selected remedy includes containment of the contaminated shallow and intermediate groundwater at the mouth of Puente Valley. Cacique Inc., current tenant of the subject property, was listed in the WIP (Well Investigation Program) database and received no further action (NFA) status from the Regional Water Quality Control Board (RWQCB) San Gabriel Valley Cleanup Program. Adjacent and surrounding properties throughout the subject property vicinity were investigated as a part of the San Gabriel Valley Cleanup Program. Le Van Specialty Company Inc. at 14923 East Proctor Avenue is located approximately 70 feet northeast of the subject property across Proctor Avenue. The facility is listed as actively investigated regarding the WIP program. According to release listings and the GeoTracker database, the site had a release of VOCs including PCE and trichloroethylene (TCE) impacting groundwater and the RWQCB opened the case on August 11, 1992. From review of an Additional Phase II Environmental Site Assessment by SALEM Engineering Group, Inc. dated June 7, 2019, groundwater was encountered at approximately 54 feet bgs and the direction of groundwater flow was to the north-northwest. Sixteen soil borings were advanced at the facility and converted to soil vapor probes at 5 and 15 feet bgs. Total petroleum hydrocarbons (TPH) and VOCs were non-detect in any of the soil samples. Title 22 metals were not detected above commercial and industrial screening levels. However, PCE was detected at the 5-foot soil vapor samples ranging from 0.17 micrograms per liter ($\mu\text{g/L}$) to 4.4 $\mu\text{g/L}$ and the 15-foot soil vapor samples from 0.32 $\mu\text{g/L}$ to 15 $\mu\text{g/L}$. TCE was detected at 0.17 $\mu\text{g/L}$ at the 15-foot soil vapor sample. SALEM completed a Human Health Risk Assessment (HHRA) using the maximum PCE soil vapor concentration at a depth of 5 feet bgs (4.4 $\mu\text{g/L}$). SALEM concluded that the data suggested that soil and soil vapor at the subject property did not pose a potential risk to human health or the environment. VOCs detected in the groundwater sample collected from MW-1 included PCE at 32 $\mu\text{g/L}$ and TCE at 13 $\mu\text{g/L}$. These concentrations exceeded their respective Maximum Contaminant Levels (MCLs) of 5.0 $\mu\text{g/L}$.

According to an Office of Environmental Health Hazard Assessment (OEHHA) Review Report for the site dated June 14, 2019, the 2019 Additional Phase II Environmental Site Assessment was reviewed by a toxicologist. OEHHA's estimated indoor air concentrations and corresponding cancer risk and non-cancer hazard index exceeded 10-5. The estimate based on samples within the building footprint also exceeded a hazard index of 1. OEHHA's estimates represent potential risks at the site but were noted that they may not be the actual risks experienced by occupants in the on-site building. OEHHA recommended that indoor air sampling would provide more definitive information on potential occupants' VOC exposure. The RWQCB completed a review and evaluation of the information provided and determined that the site has met the RWQCB's requirements for NFA for soils only. However, the RWQCB noted that groundwater quality shall continue to be monitored annually. The impacts of groundwater in the vicinity of the subject

property from the San Gabriel Valley Area 4, with PCE and TCE concentrations above MCLs, shallow depth to groundwater in the vicinity of the subject property, and OEHHA evaluation of the adjacent property as an identified potential risk for vapor intrusion, represents a vapor encroachment concern (VEC) for the subject property warranting further assessment and human health risk evaluation.

A *controlled recognized environmental condition (CREC)* refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

- Partner identified no CRECs in connection with the subject property.

A *historical recognized environmental condition (HREC)* refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. The following HREC was identified during the course of this assessment:

- **Former USTs.** The subject property was formerly developed with a 10,000-gallon gasoline UST, a 10,000-gallon diesel UST, a 500-gallon new oil UST (also referred to as a 550-gallon), and a 500-gallon waste oil UST. These USTs were located on the south side of the subject property structure. On June 10, 1990, the 10,000-gallon gasoline UST, 10,000-gallon diesel UST, and 500-gallon new oil UST were removed from the subject property under oversight of Los Angeles County Department of Public Works (LACDPW). Two soil borings were advanced at the inverts of both ends of the fueling USTs and one soil boring was advanced at the central invert of the oil UST. Soil samples were analyzed for TPH and benzene, toluene, ethylbenzene and xylene (BTEX). According to review of analytical results, TPH and BTEX were non-detect in soil samples with exception of a minor concentrations of 57 parts per billion (ppb) of toluene. Based on the results of the sampling, the LACDPW issued a "no further action" designation for the three USTs on July 18, 1990.

In October 1990, the Cacique facility was inspected by the RWQCB due to its past and present chemical storage, handling and disposal practices. The site inspection was required by the U.S. EPA and was enforced by the RWQCB under the WIP due to the subject property's location within the San Gabriel Valley Area 4 Superfund Site contamination plume.

On January 2, 1991, one 500-gallon waste oil UST (also referred to as 550-gallons; i.e., the fourth and last UST reportedly associated with the subject property) was removed from the southern portion of the subject property under the oversight of the LACDPW. A total of four soil samples were collected from the tank excavation. TPH was detected at a maximum concentration of up to 1,950 milligrams per kilogram (mg/kg) below the east end of the tank and 30 micrograms per kilogram ($\mu\text{g}/\text{kg}$) of chloroform were identified in samples collected from the excavation. The chloroform concentration was below the RWQCB's water quality goals of 190 $\mu\text{g}/\text{kg}$ and TPH was characterized as hydraulic oil. However, in February 1991, the RWQCB indicated that the RWQCB

was not involved in overseeing the removal of the waste oil UST and the sampling of the soil was not conducted in a fashion acceptable by the RWQCB. The RWQCB suggested that an additional investigation be conducted under their oversight in order to be considered for "case closure". On July 23, 1991, an additional investigation was conducted at the subject property in the vicinity of the former waste oil UST under the oversight of the RWQCB. Samples were collected in the vicinity of the former waste oil UST at 18.5 feet bgs and analyzed for TPH and VOCs. According to the analytical results, all contaminants of concern were non-detect. Based on the results of the investigation and the previous soil sampling results, final closure was requested for the former waste oil UST.

On April 25, 1996, the RWQCB San Gabriel Valley Cleanup Program provided case closure, based on the indication that no vapor degreaser was used onsite and chlorinated VOCs were identified onsite. Based on the UST removal, non-detect to low concentrations identified during soil sampling, and case closure during a time of stringent regulatory oversight, these USTs represent an HREC. Partner recommends no further action or investigation regarding this issue.

An *environmental issue* refers to environmental concerns identified by Partner, which do not qualify as RECs; however, warrant further discussion. The following was identified during the course of this assessment:

- The subject property was formerly developed with railroad tracks on the northwest portion of the subject property from at least 1964 to 1979. Railroad spurs represent environmental concerns due to the potential for historical application of oils containing polychlorinated biphenyls (PCBs), herbicides, and arsenic for pest and weed control. Concentrations of these constituents of concern resulting from the railroad right-of-way, if any, would likely be confined to the near subsurface sediments and would be unlikely to represent an environmental concern to the continued use of the subject property for commercial purposes.
- Due to the age of the subject property buildings, there is a potential that asbestos-containing material (ACM) and/or lead-based paint (LBP) are present. Readily visible suspect ACMs and painted surfaces were observed in good condition. Should these materials be replaced, the identified suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants, and any LBP should be removed in accordance with all applicable laws.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 14940 East Proctor Avenue and 342 South 9th Avenue in City of Industry, Los Angeles County, California (the "subject property"). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report.

This assessment has revealed evidence of a REC, an HREC and environmental issues in connection with the subject property, as described above.

8.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

Partner has performed a Phase I Environmental Site Assessment of the property located at 14940 East Proctor Avenue and 342 South 9th Avenue in City of Industry, Los Angeles County, California in conformance with the scope and limitations of the protocol and the limitations stated earlier in this report. Exceptions to or deletions from this protocol are discussed earlier in this report.

By signing below, Partner declares that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in §312.10 of 40 CFR §312. Partner has the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the subject *property*. Partner has developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Prepared By:



Chloe Adelman
Environmental Professional

Reviewed By:



David Boyce
Senior Author

9.0 REFERENCES

Reference Documents

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