

March 8, 2024

Macy Canete
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SUBJECT: Response to Review of Response to Comments on Peer Review of Existing Environmental Reports and Peer Review of Hazardous Materials Survey Report
14940 Proctor Avenue
City of Industry, California 91745
Project Number ES21-337685

Dear Ms. Canete:

Partner Engineering and Science Inc. (Partner) has prepared this letter in response to address comments that were received from the City of Industry prepared by Leighton Consulting, Inc. (Leighton) on March 6, 2024, based on their review of reports that Partner prepared for the property located at 14940 Proctor Avenue in City of Industry, California (hereafter "the Site"). Each comment or question is restated and addressed below as appropriate.

Leighton reviewed the following documents prepared by Partner:

- *Response to Comments - Response to Comments – Peer Review of Existing Env. Reports*, Partner, January 25, 2024
- *Hazardous Material Survey Report*, November 11, 2023, updated January 25, 2024

Based on their review of these documents, Leighton provided the following comments/questions. Partner's response to each of these comments is provided below.

REVIEW OF RESPONSE TO COMMENTS - PEER REVIEW OF EXISTING ENV. REPORTS (PARTNER, 2024)

Comments related to the Phase I ESA (Partner, 2021) and the Subsurface Environmental Assessment (Partner, 2023a) have been adequately addressed by Partner and Leighton has no further comment.

REVIEW OF REVISED HAZARDOUS MATERIALS SURVEY REPORT (PARTNER, 2024)

Comment 4.1A: The report is generally within industry standards, the following deficiencies and/or departures from industry standards were observed:

Comment 4.1: There were two asbestos-containing materials identified in the subject testing report. It is a required element to satisfy the regulatory requirements set forth in SCAQMD Rule 1403 that the quantity and location of asbestos materials be listed in the report.

- Mitigation: It is understood that this will be completed once a demolition-level survey can be completed, likely in June of 2024, and is currently "accepted," for a preliminary report, but this must be corrected prior to demolition activities.

Partner Response: The final demolition-level survey report will address the comments noted.

Comment 4.2: On Page 5 of the document (Page 2 of the report), in Section 1.3.1 of the report, the report clearly states that the roof of the building was not sampled to avoid leaks and that the building was occupied during the investigation, and that several interior areas of the building were not sampled.

- Mitigation: As with Item 1, it is understood that this will be completed once a demolition-level survey can be completed, likely in June of 2024, and is currently "accepted," for a preliminary report, but this must be corrected prior to demolition activities.

Partner Response: The final demolition-level survey report will address the comments noted.

Comment 4.3: On Page 8 of the document (Page 5 of the report), in Section 1.3.2 of the report, the report clearly lists the laboratory utilized for the analysis of asbestos bulk samples, and states that they are NVLAP-and AIHA-accredited. The report has been corrected to reflect the laboratory's contact information and Cal/ELAP certification number, but still does not contain the NVLAP accreditation number for the subject laboratory, which is a required element to satisfy the regulatory requirements set forth in SCAQMD Rule 1403.

- Mitigation: The NVLAP accreditation number for the laboratory utilized to analyze asbestos bulk samples must be included in the body of the report to satisfy the requirements of 40 CFR 61, Subpart M and SCAQMD Rule 1403. In the event that a second laboratory is utilized for future testing, their contact information, Cal/ELAP certification number and NVLAP certification number must also be included in the body of the report.

Partner Response: The final demolition-level survey report will address the comments noted.

4. The condition assessment of the various materials tested for asbestos has been updated to note damage to non-ACM pipe insulations. In Appendix D of the subject report, however, Photograph Number 4 appears to show damage to ACM elbow insulation in two places, including the visible elbow associated with the "front" pipe (at the top left of the photo) and the elbow associated with the visible elbow associated with the "third" pipe (just to the bottom right of the large flange in the photo). The condition in the report indicates that this ACM elbow insulation is in good condition. Vista did not perform an assessment of the site, and the damage visible in the photo could be as simple as a sampling location, so the current damage assessment for the ACM elbow insulation is currently deemed "accepted," but it should be noted that if the SCAQMD were to review this report, it would likely be their assessment that the subject picture (Photograph Number 4 in Appendix D)

reflects damage to a known ACM, which in turn requires not only correction of the report but a Procedure 5 Work Plan to address the damaged friable ACM.

- Mitigation: This issue of potential damage to the ACM elbow insulation depicted in Photograph Number 4 should be reviewed, and corrected, or explained, when preparing the report for the demolition-level survey to be performed in June of 2024.

Partner Response: The final demolition-level survey report will address the comments noted.

- Mitigation Summary: In order to bring the report into compliance with all requirements of the various applicable regulations, the various shortcomings acknowledged to be pending, which cannot be corrected until such time as a demolition-level investigation is completed, ostensibly after the current tenant vacates the building, likely in June of 2024, must be adequately addressed in a future report for said demolition-level investigation, as required by SCAQMD Rule 1403 for a demolition asbestos assessment. It is acknowledged that this may not be possible to rectify earlier. In addition, the demolition-level report should be updated to include the NVLAP accreditation number in the body of the report for the laboratory utilized to analyze asbestos bulk samples. A response to comments should be submitted acknowledging these outstanding items. A revised report is not required at this time assuming that the outstanding items will be addressed in a demolition-level investigation report prior to demolition activities.

Partner Response: The pre-demolition survey was completed on March 1, 2024, and the report is currently being prepared. The final report will address the comments noted above and is expected to be submitted no later than March 27, 2024.

Signatures of Environmental Professionals

If you have any questions regarding the responses provide above, please contact the undersigned at (310) 956-3273 or tmen@partneresi.com.

Regards,



Terri Men, CEM
Senior Project Manager – Environmental Solutions