Prepared for:
Gardena 40 Investors, LLC
Gardena, California

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Date:
March 2019

Project Number:
1690011591

PHASE I ENVIRONMENTAL SITE ASSESSMENT AND SUPPLEMENTAL SUBSURFACE INVESTIGATION

2101 AND 2129 WEST ROSECRANS AVENUE GARDENA, CALIFORNIA

RAMBOLL

ENVIRONMENT
& HEALTH

SIGNATURE AND ENVIRONMENTAL PROFESSIONAL STATEMENT

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

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1. SUMMARY OF CONCLUSIONS

The Environment & Health group of Ramboll US Corporation (Ramboll)[1] was retained by Gardena 40 Investors, LLC (Gardena 40) to perform a Phase I Environmental Site Assessment (ESA) of the property located at 2101 and 2129 West Rosecrans Avenue in Gardena, California (herein referred to as the "facility," or the "site"). Ramboll's assessment was conducted in connection with a potential purchase of the site. The objective of the Phase I ESA, which was conducted in conformance with the scope and limitations of ASTM International's *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* E1527-13 (the "ASTM Standard"), was to identify Recognized Environmental Conditions (RECs), as defined in the ASTM Standard (see Section 2.1).

In addition to the Phase I ESA scope of work, Ramboll conducted a supplemental Phase II subsurface investigation that included the sampling and analysis of soil, soil vapor, and groundwater. The details of the subsurface investigation are presented in Section 6.

1.1 Site Summary

Medgal Trust and multiple other entities own and lease the office, parking lot and automotive repair shop space in Gardena, California (Figure 1). The approximately 5.6-acre site is improved with two on-site buildings including an approximately 11,500-square foot office building ("the office building") and an approximately 25,500-square foot "L-shaped" automotive repair service building ("the repair shop"). Additionally, a small approximately 5,400-square foot building is attached to northern edge of the office building (Figure 2). The site has two addresses, 2129 and 2101 West Rosecrans Avenue with Assessor Parcel Numbers 4061-028-049 and 4061-028-018. The 4061-028-018 parcel is listed in the Los Angeles County Assessor's Office as vacant land with no address available. For purposes of this report, both parcels will be referred to as "the site".

In the 1960 and 1970s, the western portion of the site was used for automobile storage and automobile parts salvage, while the eastern portion of the site was used for metal salvage. Metal salvage appeared site wide by the late 1970s and early 1980s. The office building was constructed by 1976. The remaining onsite building and attached building appear onsite in 1988 and 1989. The site use changed from automobile parts salvage to taxi services in the late 1980s and early 1990s. The site appears in present day configuration by 1989.

Historical aerial photographs indicate the site was part of a larger area used for agricultural purposes from the 1920s to the early 1950s. By the early 1970s, the vicinity of the site appears to have been largely developed for industrial uses.

1.2 Recognized Environmental Conditions

Ramboll performed a Phase I ESA of the site at 2129 and 2101 West Rosecrans Avenue in Gardena, California in conformance with the scope and limitations of the ASTM Standard. Any exceptions to, or deletions from, this practice are described in Section 7.2 of this report. This assessment has revealed no RECs in connection with the site, with the exception of the following:

On-site Soil Impacts. There are known impacts to soil by heavy metals, polychlorinated biphenyls (PCBs), petroleum and aromatic hydrocarbons, and to a lesser extent methyl tert-

[1] Ramboll was previously known as Ramboll Environ US Corporation and ENVIRON International Corporation.

butyl ether (MTBE) at the site. The site was previously used for automotive metal wrecking and salvage from the 1950s through the 1980s. During this time period, multiple piles of scrap metal, abandoned automobiles, above-ground storage tanks (ASTs) and underground storage tanks (USTs) and machinery were located on the site. Metal-impacted soil was excavated and removed from the site in the 1990s, and a closure letter was issued for the site by the Los Angeles County Fire Department (LACoFD) for satisfactory mitigation for the site under a commercial land use scenario in 1992; however, closure was not granted for residential land use.

Additional site-wide soil sampling was conducted by Fulcrum Resources Environmental (FR) in 2017 and by Leighton & Associates in 2018, which revealed the presence of elevated concentrations of metals, PCBs and total petroleum hydrocarbons (TPH) above commercial screening levels. FR recommended the removal of shallow soils with impacted elevated metals, PCBs, petroleum hydrocarbons and aromatic hydrocarbons/MTBE at various locations. Ramboll's 2019 limited subsurface investigation further delineated the impacted soils. The results of Ramboll's limited subsurface investigation are further discussed in Section 6.

Groundwater Contamination from an Upgradient Source. Groundwater investigations conducted at the site indicate that VOC-impacted groundwater has migrated onto the site from an unknown, hydrologically upgradient source or sources located to the north of the site. No evidence generated to date indicates that the site has caused or contributed in any significant way to the groundwater impacts. According to the State of California's GeoTracker website, three properties located northwest and upgradient of the site are under evaluation by the Regional Water Quality Control board (RWQCB) as potential sources of contamination in the vicinity of the site. The three properties are all automotive repair and maintenance facilities. All three properties appear on the historical automotive database from at least 1995, with one property being listed as historical automotive repair facility since 1964. Letters requesting current and former chemical use were issued by the RWQCB to the properties located at 2142 West 139th Street, 13906 and 13908 Van Ness Avenue in January 2018. No further information regarding any responses from these entities was obtained.

In addition, the property directly to the north of the site, identified as Real Soda Company, historically was listed under various companies including a graphics arts and printing shop, which were documented to have used chlorinated solvents. The 99,952 square-foot building was constructed in 1966 and was most likely first occupied by the So Cal Carton Co Inc (the Carton Company). The Carton Company occupied the site from at least 1968 to approximately 1985. Records obtained from the South Coast Air Quality Management District (SCAQMD) indicated equipment associated with the Carton Company included drying ovens, roller coaters, printing presses and an application for a Rule 1130(C) permit. Rule 1130(C) pertains to reducing VOC emissions from graphic arts operations. The Standard Industrial Classification (SIC) code for the Carton Company is 5113, which includes industrial and personal service paper. The business name listed for the site in 1971 through 1981 includes Graphic Arts Packaging Corp in addition to the Carton Company. The Carton Company appeared to be out of business by 1985. The Hawthorne Printing Company and A Letter Press Shop are listed as occupants at the property in 1995. Hawthorne Printing Company is listed in the California Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System database for generating hazardous waste from 1993-2005, including alkaline solutions, photo chemicals, liquids with halogenated organic compounds, silver, and

PCE. The Hawthorne Printing Company also had an inspection permit issued by the Los Angeles County Department of Public Works (LA Co DPW) Industrial Waste department. California Concepts Inc and A Letter Press Shop are both listed at the site from 1995 to 2001. From 2010 to present day, the Real Soda In Real Bottles company is listed at the property. If contamination associated with off-site properties is found to have migrated onto the subject site, it is expected that any remedial activities would be the responsibility of the entity(ies) named in the listing or other designated responsible party and not Gardena 40.

Vapor Intrusion Risk. The subsurface investigations conducted by previous consultants and by Ramboll indicate the presence of elevated VOCs in soil vapor exceeding regulatory screening levels throughout several portions of the site. The primary chemicals of concern identified are VOCs, in particular, PCE, TCE, and vinyl chloride. The impacts in soil vapor appear sporadic and primarily confined to the eastern portion of the site, overlying the area of impacted groundwater. In addition, the concentrations generally appear to increase with depth. The presence of elevated VOCs in soil vapor indicate a vapor intrusion concern, which may require mitigation as part of future development activities (*e.g.*, in the form of vapor mitigation systems).

1.3 2019 Ramboll Site Investigation

As described herein, several historical Phase II subsurface investigations have been conducted at the site. Based on Ramboll's review of the historical data, several key issues of concern were identified that warranted additional investigation. Ramboll conducted a supplemental subsurface investigation at the site that included collection of soil, soil vapor and groundwater samples. The objective of the supplemental subsurface investigation activities was to further evaluate and characterize subsurface conditions at the site.

In January 2019, Ramboll advanced 38 borings at the site to depths ranging from approximately 5 to 30 feet below ground surface to selectively collect soil, soil vapor and groundwater samples to further delineate the impacts detected by prior consultants.

The analytical results were compared to applicable state and federal screening levels for industrial/commercial and residential land use. Soil sampling results are compared to United States Environmental Protection Agency (USEPA) and/or DTSC-modified residential Regional Screening Levels (RSLs). Soil vapor screening thresholds were calculated as the ratio of USEPA indoor air regional screening thresholds (RSLs) and/or DTSC's HERO Note 3 values to default attenuation factors as recommended by Cal/EPA (2011). Groundwater analytical data was compared to the USEPA and California maximum contaminant levels (MCLs).

The results, findings and conclusions from Ramboll's 2019 limited subsurface investigation are presented and discussed in Section 6 of this report.

1.4 Other Findings

The term "other finding" is not defined by ASTM; rather, Ramboll uses the term to connote areas of contingent risk that are not clearly defined by the ASTM Standard. Ramboll did not identify any significant other findings, with the exception of the following:

1.5 Former Underground Storage Tanks (USTs).

No USTs are reported to remain onsite. Historically, three USTs were reportedly located on-site. One 3,000-gallon four-compartment UST, historically located in the northwestern

portion of the site, was removed in 2005. No evidence of a release was identified at the time of the UST removal. The LA Co DPW granted closure for the removal of this UST in 2006.

Two additional USTs were historically located in the southeastern corner of the site, including a 2,000-gallon gasoline and 10,000-gallon diesel fuel USTs. These USTs were reportedly associated with former automotive wreckage activities conducted onsite by the former owner. The USTs were reportedly removed in 1991, however closure records pertaining to the removal were not available and were not identified through research conducted as part of this Phase I ESA. However, 2017 soil sampling conducted in this area by FR indicated no elevated levels of VOCs, PCBs, total petroleum hydrocarbons or benzene, toluene, ethylbenzene and xylene (BTEX). Soil samples were collected at four locations at 5 foot increments up to 15 feet bgs around the former UST area. Based on the results of the soil sampling conducted by FR and follow up soil vapor sampling conducted by Ramboll in 2019, the USTs do not appear to represent an environmental concern to the Site. Therefore, Ramboll does not consider the former USTs to present a REC and recommends no further investigation regarding this issue.

1.6 Non-Scope Considerations

Ramboll identified the following findings that relate to non-scope considerations (as discussed in Section 2.2), as detailed below:

- **Asbestos-Containing Materials.** Given the date of construction of the earliest site building in 1976, it is possible that ACM are present in building materials. According to facility personnel, a formal asbestos survey has not been conducted at the facility. Ramboll conducted visual observations of limited areas of the site building but observed no potential asbestos-containing material (PACM) (e.g., thermal system insulation [TSI] associated with rooftop piping). Ramboll did note other suspect materials that may contain asbestos (e.g., drywall, roofing materials). The suspect ACM that were observed by Ramboll did not appear to be extensively damaged, broken or deteriorated.

  In addition, a portion of the Site has an asphalt paved parking and driveway areas. There is a potential that asbestos-containing materials, such as transite pipe and pavement reinforcement fabric (PRF) marketed as Petromat®, may be encountered within the paved areas and subsurface excavations/grading work at the Site. The tack coating often associated with PRF sometimes contains asbestos. As such, Ramboll recommends inspecting the asphalt for the presence of transite pipe and PRF and, if observed, sampling the materials for the presence of asbestos. If encountered, such identified materials should be abated in accordance with all applicable laws, including OSHA guidelines.

- **Water Intrusion.** Ramboll did not perform a mold survey at the site; however, facility personnel provided information regarding past water intrusion events. According to facility personnel, the site has not experienced issues with water intrusion other than occasional rooftop leaks due to seasonal rainfalls at the office building. During the site visit, a roofing crew was onsite on the office building resealing portions of the roof that had recently leaked during a rainfall event the previous week. Ramboll identified no mold growth at the site.

- **Lead-Based Paint.** Lead was a major ingredient in paint pigment prior to and through the 1940s. While other pigments were used in the 1950s, the use of lead in paint

continued until the early 1970s. In 1978, the Consumer Products Safety Commission banned paint and other surfacing coating materials that are "lead-containing paint." Based on the construction date of the office site building in 1976, it is possible that lead-based paint was used historically on facility structures, but facility personnel indicated both the interior and exterior of the office building was repainted in 2010. Facility personnel were aware of no presence of any lead-based paint on structures at the facility. Ramboll observed the paint to be in good condition.

- **Radon.** Based on information included in the environmental database report, the site is located in an area categorized as Zone 2, which has average indoor basement radon levels between 2 and 4 picoCuries per liter (pCi/L). The USEPA's continuous exposure limit, which is the limit at which further testing or remedial action is suggested, is 4.0 pCi/L. This USEPA continuous exposure limit applies to residential, not commercial, properties. According to the California Radon database, eight tests conducted in the same zip code as the site indicated that none exceeded a Radon value of greater than 4 pCi/L. A USEPA survey conducted in the same zip code as the site found that the average radon level of a first-floor room at one property was 0.711 pCi/L. Ramboll concludes that radon appears unlikely to represent an environmental concern to the site and recommends no further investigation regarding this issue.
- **Lead** in Drinking Water. Drinking water is supplied to the site from the Golden State Water Company, and, therefore, would be expected to comply with state standards, such that lead is unlikely to be present at concentrations above those standards. According to the information reviewed (https://www.gswater.com/lead-drinking-water-standards/) the Golden State Water Company was compliant with Federal and State rules regulating lead in drinking water.

2. INTRODUCTION

2.1 Purpose

Ramboll was retained by Gardena 40 Investors, LLC to conduct a Phase I ESA of the site located at 2101 and 2129 West Rosecrans Avenue in Gardena, California. Ramboll's assessment was conducted in connection with a potential purchase of the site. The purpose of the assessment was to identify RECs, which are defined in the ASTM Standard as:

> "The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.""

2.2 Scope of the Assessment

Ramboll completed the following tasks, consistent with the ASTM Standard, during its Phase I ESA of the property:

- A visit to the site by Stephanie Eckelman of Ramboll on January 21, 2019, to observe the exterior and interior features of the site and to identify the uses and conditions specified in the ASTM Standard. In addition, Ramboll observed the adjoining properties from the site or adjacent public thoroughfares. Photographs taken during the site visit are presented in Appendix A.
- An interview during the site visit with Boris Hristev (Administrative Services Co-Op- 10 years), and Gary Zinshteyn (Citizen Automotive, 10 years) who are herein referred to as "facility personnel". The facility personnel interviewed by Ramboll were identified by the Company as having good knowledge of the uses and physical characteristics of the site.
- A review of information contained in federal and state environmental databases, as obtained from the sources noted below:
- A radius report prepared by Environmental Data Resources, Inc. (EDR, see Appendix B), which presents the results of searches of federal and state databases for the site, as well as properties near the site. The radius searched for each database, as well as the databases themselves, was selected in accordance with the ASTM Standard.
- The USEPA's EnviroFacts database, which provides site information contained in multiple USEPA regulatory databases.
- A review of the California Water Resources Control Board's GeoTracker website (GeoTracker), which provides information with respect to releases to soil and groundwater in the site vicinity.
- A review of the DTSC's EnviroStor (EnviroStor) website, which provides information with respect to property cleanups in the site vicinity.
- A review of the California Division of Oil, Gas, and Geothermal Resources (DOGGR) website, which provides information regarding the locations of oil and gas wells on and in the vicinity of the site.

- The Hazardous Waste Tracking System (HWTS), an online system maintained by the DTSC to generate reports on hazardous waste generation and shipments.
- A review of standard historical sources (included as Appendix C) and local agency inquiries, as defined in the ASTM Standard. The following resources were reviewed:
- Readily available historical sources (as identified in Section 4.2 of this report and included as Appendix C) to develop a history of the previous uses of the site and surrounding area.
- Local building permit information, as obtained via EDR's Lightbox application
- Historical and site-specific information obtained from the City of Gardena Building Department (Building Department), Los Angeles County Fire Department – Health Hazardous Materials Division (HMMD), and Los Angeles county Tax Assessor website (Assessor). Ramboll also requested or searched for information from the Los Angeles County Public Works – Waste Management Division's *Hazardous Materials System,* and the City of Gardena Fire Department – Fire Prevention, but personnel from these agencies reported having no information pertaining to the site.
- A review of physical setting sources, as defined in the ASTM Standard, including:
  - The current United States Geological Survey (USGS) 7.5-minute topographic map that shows the area on which the site is located.
  - Geologic, hydrogeologic, or hydrologic sources as provided in the environmental database report and in the previous environmental reports for the site, as listed below.
- A review of documents provided to Ramboll by facility personnel, including site maps, a previous environmental site assessment, and previous geotechnical investigations. In addition, Ramboll was provided with the several lab reports and the following previous environmental assessment reports, which are included as Appendix D:
  - Supplemental Phase II Subsurface Investigation at 2101 & 2129 West Rosecrans Avenue, Gardena, California", prepared by Fulcrum Resources Environmental, dated December 24, 2018 ("the Fulcrum Supplemental report").
  - Phase II Subsurface Investigation at 2101 & 2129 West Rosecrans Avenue, Gardena, California", prepared by Fulcrum Resources Environmental, dated December 11, 2017 ("the 2017 Fulcrum report").
  - Underground Storage Tank Removal and Closure Report, prepared by Environmental Support Technologies Incorporated, dated May 13, 2005 ("the UST report").
  - Cal-State Metals Contaminated Soil Removal Project Final Report, prepared by Chemical Waste Management, Inc, ENRAC Division, 1992 ("1992 soil removal report").
- A search for environmental liens or other activity and use limitations (AULs) for the site, provided by EDR (as shown in Appendix E). Ramboll ordered the lien search using the parcel numbers believed to be associated with the site, as obtained from the local tax assessor's office and other online resources.

This assessment was conducted in accordance with the methodology specified in ASTM Standard E1527-13, as agreed upon by Ramboll and Gardena 40 in January 2019. The standard ASTM scope was expanded to include a limited review of asbestos-containing materials, lead-based paint, water intrusion, and radon.

2.3 Reliance and General Limitations

This report has been prepared for the exclusive use of Gardena 40, LLC and Borstein Enterprises, and may not be relied upon by any other person or entity without Ramboll's prior express written permission, except as may be otherwise agreed to in the Master Services Agreement between Gardena 40, Borstein Enterprises and Ramboll (the "MSA"). 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.

The conclusions presented in this report represent Ramboll's best professional judgment based upon the information available and conditions existing as of the date of this report. In performing its assignment, Ramboll must rely upon publicly available information, information provided by the client, and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate and complete. As required by the ASTM Standard, Ramboll evaluated all third-party material to determine its reliability and thoroughness. This review is not intended as legal advice, nor is it an exhaustive review of site conditions or facility compliance. Other than as set forth in the contract between Ramboll and exclusive use of Gardena 40, Ramboll makes no representations or warranties, expressed or implied, about the conditions of the site.

Ramboll's scope of work for this assignment did not include collecting samples of any environmental media, except as noted in Section 6. As such, this review cannot rule out the existence of latent conditions including contamination not identified and defined by the data and information available for Ramboll's review; however, this report is intended, consistent with normal standards of practice and care, to assist the client in identifying the risks of such latent conditions.

The scope of work for this assessment did not include an asbestos survey or inspection. According to federal OSHA regulations (29 CFR §1910.1001) and the Model Accreditation Plan (MAP; 40 CFR Part 763, Subpart E, Appendix C), the inspection, testing, evaluation, and/or sampling of suspect asbestos-containing materials must be conducted by an accredited inspector; these activities were not performed as part of this environmental review. Comments in this report regarding the condition of building materials at the site, including presumed or suspect ACM, represent only Ramboll's observations at the time of the site visit and are not intended to be consistent with definitions regarding ACM condition in the Asbestos Hazard Emergency Response Act (AHERA) or in other federal or state asbestos regulations or industry standards.

Other issues considered outside the scope of the ASTM Standard and this review include lead in drinking water, wetlands, Polychlorinated biphenyls (PCBs) in building materials, cultural and historic resources, ecological resources, endangered species, and high voltage power lines.

3. SITE DESCRIPTION

3.1 Site Setting

Medgal Trust and multiple other parties own the site and lease it out to Citizen Automotive for automotive repair activities, and to Administrative Services Co-Op for taxi cab business transactions. The site is located at 2101 and 2129 West Rosecrans Avenue in Gardena, Los Angeles County, California. The approximately 5.6-acre site is located approximately thirteen-miles south of Downtown Los Angeles (Figure 1). According to the Assessor's Website, the two assessor's parcel numbers (APN) for the site are 4061-028-049 and 4061-028-018.

The site is improved with two on-site buildings; an approximately 11,500 square foot office building and an approximately 25,500-square foot automotive repair shop building (Figure 2). A small approximately 5,400-square foot building is attached to the office building. The one-story office building houses administrative activities conducted by Administrative Services Co-op (ASC) associated with the Citizen Automotive repair shop. Automotive repair activities located within the one-story repair shop building include brake services, oil changes, engine repair, paint services, dent repair in addition to general automotive maintenance activities. The buildings are located along the western and northern portions of the site.

The site is accessed via an asphalt-paved entrance along West Rosecrans Avenue located at the southwestern site boundary. The asphalt-paved site entrance leads to a narrow parking area along the southwestern portion of the site and then onto a larger parking area located in the center portion of the site. Approximately 1.6 acres of the southeastern portion of the site are undeveloped land. There are no landscaped areas or on-site surface water bodies.

Table 1 provides an overview of physical setting and utility information for the site.

Table 1: Physical Setting and Utility Information

Conditions	Source	Description
Topography		
Elevation (above mean sea level)	USGS topographic map; Google Earth	Ranges from approximately 44 feet near the southwest corner to 47 feet near the northeastern corner of the site.
Topographic Gradient	USGS topographic map; visual observations	Relatively flat on-site, with a gentle downward slope to the northwest. Regional topography slopes gently downward to the west towards the Dominguez Channel.

Table 1: Physical Setting and Utility Information

Conditions	Source	Description
Hydrology		
Storm Water Runoff	Visual observations; Facility personnel	Stormwater from the roof drains percolate into the ground surface at unpaved areas in the parking lot, percolates into the ground in the undeveloped lot, or it sheet flows from the site onto West Rosecrans Avenue where it enters storm water drains. Parking lot water near the repair shop is diverted into drainage channels and directed to the clarifiers onsite.
Nearest Surface Water Body to the Site	USGS topographic map; Visual observations	The Dominguez Channel is located approximately ½-mile to the west at its nearest point. The Dominguez Channel ultimately discharges near the Port of Los Angeles in San Pedro Bay then to the Pacific Ocean.
Flood Plain	FEMA*; Facility personnel	Facility personnel reported no known occurrences of flooding at the site. The site is not located within a 500-year flood zone.
Wetlands	NWI*; Visual observations	There are no federally-designated wetlands on-site, although wetlands areas are present near the Dominguez Channel approximately ½-mile west of the site. Ramboll did not identify any obvious suspected wetlands at the site during the site visit.
Geology and Hydrogeology		
Presumed Direction of Shallow Groundwater Flow	USGS topographic map; Ramboll 2019 limited subsurface investigation	Information obtained during the recent Ramboll January 2019 investigation indicated that groundwater flows in a southeasterly direction.
Depth to Groundwater	GeoTracker database; Ramboll 2019 limited subsurface investigation	Depth to groundwater ranged from approximately 24 to 26 feet bgs during Ramboll's January 2019 Phase II investigation.
On-site Wells	Facility personnel; Visual observations; DOGGR	There are no production, monitoring, injection, or oil and gas wells on-site.

Table 1: Physical Setting and Utility Information

Conditions	Source	Description
Nearest Groundwater Supply Wells	Database report	One federally registered well is present between one-half and one mile west of the site. The federally registered well is not registered as a public supply well. Three private or municipal wells that may be used for water supply are located within one mile of the site.
Geologic Conditions	GeoTracker database- Ramboll 2019 limited subsurface investigation	During Ramboll's limited Phase II subsurface investigation, the soils in the northern portion of the site consisted of primarily silty sand from the surface to 2 feet bgs. Fill material with minor amounts of debris was encountered from 2 to 4 feet bgs. Fine grained sediment consisting of interbedded silty clay and clay were documented from 4 feet bgs to the total depth drilled (approximately 30 feet bgs). In the vacant lot located in the southern portion of the site, fill material and debris was encountered from the surface to approximately 7 feet bgs. Primarily silty sand was encountered from approximately 7 to 10 feet bgs, and the lithology consisted of interbedded silty clay and clay from approximately 10 to 30 feet bgs.
On-site Wells	Facility personnel; Visual observations; DOGGR	There are no production, monitoring, injection, or oil and gas wells on-site. One idle oil and gas well, API 0403705283, is located within one mile southeast of the site. The site is leased by Circle Oil & Gas Co.
Site Utility Information		
Heating and Cooling Equipment	Facility personnel	The office building temperature is regulated with several rooftop air handling units that contain R22 refrigerant. The shop building does not have temperature regulation.
Electricity Supplier	Facility personnel	Southern California Edison (SCE).
Natural Gas Service	Facility personnel	Southern California Gas Company.
Use of Fuel Oil for Building Heat	Facility personnel	No current or former use of fuel oil reported.
Water Supply	Facility personnel	The facility receives drinking and process water from the Golden State Water Company, which delivers blended water from groundwater pumped from the West and Central Coast Groundwater Basins and imported water from the Colorado River Aqueduct and State Water Project.

Table 1: Physical Setting and Utility Information

Conditions	Source	Description
Sanitary Sewer	Facility personnel	The facility discharges wastewater to the City of Gardena municipal sanitary sewer system.
Septic Systems	Facility personnel	No identified current or former septic systems.

Notes:

Bgs = below ground surface

FEMA = Federal Emergency Management Agency; NCSS = National Cooperative Soil Survey; NWI = National Wetlands Inventory

* - Source was provided in the environmental database report

3.2 Current Use of Property

3.2.1 Current Operations

Two large buildings occupy the northern and western portions of the site (Figure 2). The western rectangular building consists of an office building associated with taxi services. The "L- shaped" large building in the northern portion of the site consists of an automotive repair shop building managed by Citizen Automotive. A small open-air car wash area is located in the northeastern portion of the site. Additional trench drains are located along the perimeter of the shop building. The drains are funneled into one of two onsite clarifiers.

The remainder of the site consists of an approximately 0.8-acre automotive storage parking lot in the middle portion of the site, and an approximately 1.6-acre vacant and undeveloped field in the southeast portion of the site. Facility personnel indicated the field has been undeveloped since the current owner purchased the site in 1989 due to land use agreements with the owner.

The three main operation activities onsite include administrative activities in the office building, automotive repair and maintenance in the shop building, and car wash activities in the northeastern portion of the site. The major operations conducted at the facility are described in further details below:

- ASC Office Building-activities include largely administrative tasks (i.e. recordkeeping, billing, dispatch). None of the office building activities include the use of large amounts of chemicals. One approximately 50-gallon diesel Kohler backup generator is located along the western portion of the building. Facility personnel reported no leaks or spills associated with yearly refilling of the tank.
- Citizen Automotive Repair Shop-activities include general automotive repair and maintenance services. Repair activities include brake services, oil changes, engine repair, paint services, dent repair in addition to general automotive maintenance activities. Hazardous chemicals associated with the repair shop include fresh oil, automotive coolant, paint booth paints, acrylic lacquer primer, color blending solvents, acetone, and

additional automotive maintenance chemicals in retail size containers. Uniforms are removed from the site weekly by Kleen Kraft Services.

- Carwash-activities include automotive washing, vacuuming and drying activities. The water reclamation system by N/S Wash Systems utilizes cleaned and treated water. The carwash is a "closed loop" system. Pressurized water is used to clean off dirt, grease and grime from the automotive. The soiled water is then channeled into a sump-pump system which treats the soiled water and returns it to large approximately 200-gallon plastic water containers for reuse. Non-hazardous soap is used within the system. The personnel in charge of the car wash area was unavailable during the site walk. Onsite facility personnel were unaware of water treatment chemicals or specific processes.
- Facility personnel indicated maintenance-related materials, such as non-chlorinated degreasers, lubricants, sanitizers, glass/bathroom cleaners, soaps, paints, and roof cement are occasionally used onsite. In addition, two compressed gas cylinders including oxygen and argon are in the Body Shop area of the repair shop. A 30-gallon ArmaKleen non-hazardous parts cleaner wastewater container is located within the repair shop area. Particulate waste generated by the car wash is collected in a filter and disposed of in the general trash.
- The office building, automotive report shop and car wash operations have reportedly remained consistent during its period of occupancy at the facility since 1989. According to facility personnel, no chlorinated solvents are currently used at the facility, however the Citizen Automotive repair shop has only occupied the site since 1989.
- Hazardous wastes generated by the repair shop include waste paints, waste transmission fluid used oil, waste oil filters and waste coolant. Additional automotive wastes are stored in a satellite area in 55-gallon containers next to the paint booth, along the shop wall, and in the hazardous waste storage area along the western portion of the repair shop building. Citizen Automotive is considered a Resource Conservation and Recovery Act (RCRA) small quantity generator (SQG) (Generator Number CAL000269240). Two 275-gallon waste oil containers, within secondary containment, are located in the hazardous waste storage area. An additional 275-gallon waste coolant container is located within secondary containment adjacent to the waste oil containers. Paint booth containers are reportedly dried out and thrown out in the general facility trash area. Alpha Oil Waste Management removes hazardous waste from the site.
- Non-hazardous waste generated at the site consist of general trash, scrap metal and non-hazardous parts cleaner. General facility trash is located in three trash dumpsters located within a concrete enclosure along the western portion of the site and is removed offsite by Waste Resources of Gardena weekly.
- Wastewater is discharged to the municipal sewer system. The sump associated with the car wash system is a closed loop and does not generate wastewater. Trench drains are located around the perimeter of the repair shop. Stormwater from the facility is channeled into one of two clarifiers onsite.
- Air emissions for the facility are limited to VOC products resulting from the operation of the repair shop's spray paint booth permitted by the South Coast Air Quality Management District (AQMD). The VOC emissions are controlled via a regenerative thermal oxidizer.

3.3 Current Uses of Adjoining Properties

The site is located in a mixed commercial and light industrial land use area. The nearest residential areas are located to the south of the site across West Rosecrans Avenue. Based on discussions with facility personnel, Ramboll's visual observations from the site boundary and public rights-of-way, and a limited review of publicly available information, a general evaluation of the current use of adjacent properties was developed, as described Table 2.

Table 2: Current Use of Properties Adjacent to the Site

Direction	Property/Land Use	Ramboll's Observations
Northwest	Commercial businesses, including three automobile repair facilities.	No apparent exterior manufacturing or chemical storage operations were observed, however automotive repair activities were observed onsite. See Section 7 for more information.
North	Commercial businesses including Pulp Studio and Real Soda in Real Bottles, beyond which is 139th Street with additional commercial businesses.	No apparent exterior manufacturing or chemical storage operations were observed. Residential areas consist of a mix of multi-family and single-family homes. No environmental concerns were noted. The strip mall located approximately 350 feet west of the site building did not appear to contain operations that would indicate extensive chemical use.
East	Saf Keep Storage business, Nissin Foods with additional commercial businesses beyond.	
South	U-Haul Moving and Storage of Gardena, a vacant restaurant, beyond which is Van Ness Avenue with a commercial strip mall with commercial businesses. A residential area is located further west.	
West	Rosecrans Avenue, beyond which are commercial and industrial businesses including Superior Plastic Fabrication. Auto repair shops and a car wash are further to the southwest. A residential area is located further south of the industrial buildings.	No apparent exterior manufacturing or chemical storage operations were observed. Residential areas consist of a single-family homes.

Notes:

During the site visit, Ramboll walked or drove by the borders of these properties that are shared with the site. Ramboll did not enter the neighboring properties.

4. REVIEW OF PUBLIC RECORDS AND OTHER INFORMATION SOURCES

4.1 Environmental Regulatory Database Review

Ramboll contracted with EDR in January 2019 to prepare of summary of listings in federal and state agency databases for the site and facilities within applicable radii of the site, as specified by the ASTM standard.[2] A copy of the environmental database search report is presented in Appendix B.

4.1.1 Database Review for Site

Ramboll reviewed the results of the state and federal environmental database searches performed by the third-party database provider (see Appendix B) and also reviewed information searched from the California GeoTracker and EnviroStor databases. The site is listed on two databases for which the ASTM Standard specifies that a review of pertinent files or regulatory records be conducted, the California Underground Storage Tank (UST), and the Resource Conservation and Recovery Act Small Quantity Generator (RCRA-SQG) databases. The site is also listed on the following other databases related to regulatory compliance: California Los Angeles County Hazardous Materials System (LA Co HMS), Enforcement and Compliance History Online (ECHO), Statewide Environmental Evaluation and Planning System (SWEEPS UST), Emissions Inventory Data (EMI), Facility and Manifest Data (HAZNET) and Facility Index System/Facility Registration System (FINDS). According to the EDR database, the site is listed on these compliance databases due to the historical presence of former underground storage tanks, and the generation of hazardous wastes, including "Off-specification, aged or surplus organics; Alkaline solution with organic residues pH <= 12.5; Unspecified solvent mixture; oxygenated solvents, inorganics, halogenated solvents, hydrocarbon solvents, waste oil and mixed oil, oil/water separation sludge, tank bottom waste, and Other inorganic solid waste." Listings on these databases, by themselves, are not necessarily indicative of contamination.

Citizen Automotive and Wilmington Cab Company are listed as an SQG of hazardous waste. According to the database, RCRA wastes generated on-site include ignitable wastes, corrosive wastes, PCE, non-halogenated solvents and halogenated solvents. The database lists a number of historical administrative violations, which appear to have been resolved.

The site is also listed on the UST database. According to a review of the GeoTracker database and records from the Los Angeles County Department of Public Works (LA Co DPW), a 1998 permit was issued to install four tanks onsite, however additional letters from the site indicated only one tank was installed at that time.

No USTs are reported to remain onsite. Historically, three USTs were reportedly located on-site. One 3,000-gallon four-compartment UST, historically located in the northwestern portion of the site, was removed in 2005. No evidence of a release was identified at the time of the UST removal. The LA Co DPW granted closure for the removal of this UST in 2006.

Two additional USTs were historically located in the southeastern corner of the site, including a 2,000-gallon gasoline and 10,000-gallon diesel fuel USTs. These USTs were reportedly

[2] EDR uses the term "radii" to refer to the ASTM terminology "approximate minimum search distance" in the environmental database report.

associated with former automotive wreckage activities conducted onsite by the former owner. The USTs were reportedly removed in 1991, however closure records pertaining to the removal were not available and were not identified through research conducted as part of this Phase I ESA. However, 2017 soil sampling conducted in this area by FR did not indicate elevated levels of VOCs, PCBs, total petroleum hydrocarbons or benzene, toluene, ethylbenzene and xylene (BTEX). Soil samples were collected at four locations at 5 foot increments up to 15 feet bgs around the former UST area. Based on the results of the soil sampling conducted by FR and follow up soil vapor sampling conducted by Ramboll in 2019, the USTs do not appear to represent an environmental concern. Ramboll recommends no further investigation with regard to the USTs at the site.

4.1.2 Database Review for Surrounding Properties

There are several listings in the database report for off-site properties within applicable ASTM search radii. Several of these listings (i.e., Resource Conservation and Recovery Act [RCRA] hazardous waste generators, USTs, Historical Auto Stations, compliance listings), by themselves, are not necessarily indicative of a contamination concern and, therefore, are not discussed herein and were not further evaluated for purposes of this assessment. A number of properties appear on databases indicating potential contamination concerns (i.e., e.g., Site Mitigation and Brownfields Cleanup [ENVIROSTOR], Drycleaners, GeoTracker). Of the sites representing a potential environmental concern, Ramboll has discussed in Table 3 below only: 1) facilities that are located adjoining to the site; and 2) facilities that are located potentially upgradient of the site and have not been issued regulatory closure for all listings of concern.

Table 3: Summary of Pertinent Database Listings for Off-Site Properties

Listing Name or Address and Location Relative to the Subject Site	Summary of Information Contained in Database	Ramboll's Comments
Listings for Adjoining Sites [1]		
Chromalloy Los Angeles (adjacent to the northeast)	The property is listed on the CPS-SLIC and ENVIROSTOR databases. The facility was a manufacturer of aircraft turbine engines. Chlorinated solvents including PCE and TCE as well as hexavalent chromium have impacted soil and groundwater. As of December 2014, the maximum concentration of PCE in groundwater was 97 µg/L and the maximum concentration of TCE was 6.9 µg/L. A dual-phase extraction system began operation in December 2001 and was shut off in May 2014. A deed restriction has been recorded for the site. The site was issued an NFR for soils only dated April 25, 2016. Groundwater monitoring activities remain onsite.	According to the records reviewed from GeoTracker, a January 2018 letter to the property indicated the RWQCB was continuing its investigation of potential sources of groundwater pollution detected at and in the vicinity of the former Chromalloy Los Angeles facility. However, the groundwater flow direction at this property is to the southeast. Based on the proximity of this facility relative to the site, ongoing evaluation of groundwater conditions is recommended.
Uhaul/Target Enterprises (Former Fast Fuel #72) 2155 Rosecrans Ave W (adjacent to the west)	The property is listed on the LUST and GeoTracker databases with a cleanup status of "*Open – Remediation as of 4/26/2011*" for waste oil/ motor/ hydraulic/ lubricating oil leak impacting soil and groundwater.	Based on a review of plume maps obtained from the *Low-Threat Closure Evaluation/Groundwater Monitoring Report, August 2017,* via the GeoTracker database, contaminants total petroleum hydrocarbons as gasoline (TPHg), benzene, methyl tertiary-butyl ether (MTBE), and tertiary-butyl alcohol (TBA) appear to migrate south and east towards the site, however they do not appear to extend to the site. Due to the limited migration of these contaminants in groundwater relative to the site and the agency oversight of the property, this matter is not likely to present an environmental concern to the site. Ramboll recommends no further investigation in connection with this facility.

Table 3: Summary of Pertinent Database Listings for Off-Site Properties		
Listing Name or Address and Location Relative to the Subject Site	**Summary of Information Contained in Database**	**Ramboll's Comments**
Iron Oaks Warehouse. 2045 Rosecrans Ave Gardena (adjacent to the east)	The property is listed on the LUST and GeoTracker databases with a cleanup status of "Closed – *as of September 1996*". The potential contaminant of concern was gasoline.	No further information is available regarding this facility and Ramboll recommends no further investigation in connection with this facility.
Listings for Non-Adjoining Sites [2]		
Sonic Plating Co, 1930 W Rosecrans Ave (Approximately 888 feet southeast of the site)	The property is listed on the GeoTracker, CERCLIS databases with a "refer to other agency" status. The property was a metal plating and finishing company that contaminated the groundwater with PCE and TCE.	Based on a database review, the USEPA conducted a Site Reassessment and determined on April 19, 2016 that the property warranted further Federal assessment including soil and groundwater sampling. The work was reported to be conducted within the next two years. Based on the distance of the property relative to the site, this matter is not likely to present an environmental concern to the site. No further investigation is recommended in connection with this facility listing.

Table 3: Summary of Pertinent Database Listings for Off-Site Properties

Listing Name or Address and Location Relative to the Subject Site	Summary of Information Contained in Database	Ramboll's Comments
Aerodynamic Plating Company Inc. 13629 Saint Andrews Place (Plan #3) (Approximately 1,713 feet northeast)	The property is listed on the EnviroStor database as an CEQA Notice of Exemption. The property was a metal treatment facility that impacted both soil and groundwater with Volatile Organic Compounds including PCE, TCE, and 1,1-TCA.	Based on a review of plume maps obtained from the *Fourth Quarter 2010 Groundwater Monitoring Report* via the GeoTracker database, contaminants PCE, TCE and cis-1,2-dichloroethene (cis-1,2-DCE) appear to migrate east away from the site. Due to the limited migration of these contaminants in groundwater, the distance of the property relative to the site, and the groundwater flow direction, this matter is not likely to present an environmental concern to the site and Ramboll recommends no further investigation in connection with this facility.

Notes:

[1] Ramboll's analysis of adjoining properties was based on observations made during the site reconnaissance (as discussed in Table 2) and location information for off-site listings as presented in the EDR report. The discussion of adjoining and non-adjoining properties does not include (if applicable) listings for certain databases that are (by themselves) not necessarily indicative of a contamination concern (e.g., compliance listings without indication of a release or chemical mishandling, such as RCRA hazardous waste generators or registered storage tanks). Also, for purposes of this analysis, Ramboll considers as "adjoining" properties that are immediately adjacent, even if separated by a road or other physical barrier.

[2] As noted in Table 1, shallow groundwater beneath the site flows to the southeast. Within this section, Ramboll did not discuss any off-site non-adjoining property that is listed on a database indicative of a contamination concern but for which regulatory closure has been issued, as the issuance of regulatory closure suggests that impacts to the subject site from the noted off-site property are unlikely. Finally, Ramboll did not discuss any off-site non-adjoining property that is presumed to be downgradient or cross-gradient of the site. This analysis was based on the assumption that a hazardous material released to the subsurface generally does not migrate laterally within the unsaturated soil for a significant distance, but a hazardous material can migrate in the groundwater in a generally downgradient direction; however, the direction of groundwater flow may be affected by localized topographic, hydraulic, and hydrogeologic conditions.

The EDR report indicates that poor or inadequate address information was available for one property located in the vicinity of the site; therefore, these properties could not be readily mapped by EDR. Because the location of this properties with respect to the site could not be evaluated, Ramboll is limited in its ability to express an opinion regarding the potential for impact to the site from this property. It was beyond the scope of this review to accurately locate each of the unmapped properties identified by EDR; however, Ramboll reviewed the

list of unmapped properties and verified that the site did not appear to be adjacent to the site.

4.2 Historical Uses of the Site and Adjacent Sites

4.2.1 Past Uses of the Site

A summary of Ramboll's key observations from the available historical sources is presented in Table 4.

From at least 1928 until the early 1950s, the site was used for farming activities. By 1952 the site appears to have been utilized for automotive storage along the western portion of the site and auto parts salvage along the central and southeastern portions of the site. The northeastern portion of the site appears undeveloped until the early 1960s. By 1963 the eastern portion of the site appears to have been used for auto storage and auto parts salvage up through 1983. After 1972, the western portion of the site did no longer appear to contain auto storage. By 1979, a portion of the present-day 10,000-square foot rectangular building appears in the southwestern corner of the 2129 parcel. Businesses associated with the auto parts salvage and wreckage included Cal-State Metals, Southwest Auto Parts and Wrecking, Alloys International and Metal Industrial Center.

Automotive salvage and wrecking operations appeared to have occurred on-site up until the present owners purchased the site in 1989, at which time the site was converted to a taxi cab operations business. Names associated with the site since 1989 include, but are not limited to, LA Taxi Co and United Cab Co, Beverly Hills Yellow Cab, La Taxi Co and Taxi Systems, and A2Z Car Wash.

Table 4: Summary of Key Observations from Historical Sources for the Subject Site

Historical Source	Key Observations Regarding Site History
Aerial Photographs (1928, 1938, 1947, 1952, 1963, 1972, 1979, 1983, 1989, 1994, 2002, 2005, 2009, 2012, 2016) Satellite Imagery[1] (1994, 2002-2009, 2011-2017)	From 1928 through 1947, the site appears as farm or vacant land. In the 1952 photograph, the majority of the site appears to be a mix of automotive storage and parts storage. By 1963 the entire site appears to be either automotive storage or parts salvage. By the 1979 photograph, the office building in the southwest corner of the site appears constructed. The 1989 and subsequent photographs show the site in present day configuration.
Topographic Maps (1896, 1924, 1930, 1934, 1937, 1941, 1948, 1950, 1952, 1964, 1972, 1981, 2012)	No site features are noted on the topographic maps. No environmental concerns are noted.

Table 4: Summary of Key Observations from Historical Sources for the Subject Site

Historical Source	Key Observations Regarding Site History
City Directory Abstracts (1954-2014)	The occupants of the site are listed as: A 2 Z Carwash, Administrative Svcs Corp Inc, Alloys International, Am Pm Taxi, Anything Yellow Inc, Beverly Hills Yellow Cab, Cal State Metals, Cal State Salvage Factors, Checker Cab, Citizen Automotive, Enterprise Finance Inc, Fiesta Taxi Cooperative Inc, Gal-State Metals, L A Taxi Co, LA Cab, Los Angeles Taxicab Co 8597000, Los Angeles Taxi, Mamm Livery Corporation, Metal Industrial Center, Rouse W J Law Office, Santa Monica Yellow Cab, South Bay Yellow Co-Op, Southwest Auto Parts & Wrecking, Southwest Wrecking & Auto Parts, Taxi Equip Co Inc, Taxi Equip Co Inc, Taxi Systems, Txc Finance Llc, United Cab Co, United Checker Cab Inc, Van Ness Management Inc, Venice Livery Corporation, West LA Yellow Cab, West Light West Los Angeles, Westwood Yellow Cab, Wilmington Cab Co, Wilshire Taxi Co, Yellow Cab Of Beverly Hills, Yellow Cab Of La County, Yellow Cab Of Santa Monica, Yellow Cab Of West Hollywood.
Los Angeles County Tax Assessor website	According to information available online from the Assessor's Office, the site consists of APNs 4061-028-049 and 4061-028-018. No address is listed for the 4061-028-018 parcel. At the 4061-028-049 parcel, the Assessor's office lists four buildings onsite, one 11,672 square foot building built in 1976, a second 20,610 square foot building built in 1988, a 27,000 square foot building built in 1989 and a 5,400 square foot building built in 1988. No other structures are listed on the other parcel. The legal description of the 4061-028-018 parcel is replat of blocks D and E Strawberry Park Tract west 60 feet extension of street of lot 62. The lot is listed as 36,576 square feet of land. The legal description of the 4016-028-049 parcel is replat of blocks D and E Strawberry Park track Lot 63. The parcel is listed as 201,498 square feet of land. The APN number changed from 4061-028-045 in 1993 and was associated with the 2101 West Rosecrans Avenue address. The office building was the building constructed in 1976 and underwent additions in 1988. The repair shop building was constructed in 1989.
Lien search report	The lien search report indicates that neither the 2129 nor the 2101 West Rosecrans Avenue parcels have associated liens or activity and use limitations (AULs).

Notes:

[1] In addition to aerial photographs provided by the third-party provider, Ramboll viewed historical satellite imagery provided via Google Earth. Printed copies were not obtained, and imagery dates were not independently verified.

The third-party provider reported that Sanborn fire insurance map coverage is not available for the site.

4.2.2 Past Uses of Adjacent Properties

The properties in the vicinity of the site have been used for agricultural purposes since the 1930s and commercial and industrial purposes since at least the 1960s. As mentioned previously in this report, notable operations on surrounding properties is included below.

- The current Real Soda Company property, located at 2140 West 139th Street and adjacent to the north of the site, historically was listed under various companies since 1966 including So Cal Carton Co Inc (the Carton Company), Graphic Arts Packaging Corp of Gardena and Southern California Carton Company Division of Graphic Arts Packaging Corp, the Hawthorne Printing Company and A Letter Press Shop, California Concepts Inc, A Letter Press Shop and Real Soda In Real Bottles company.
- The former Chromalloy facility located adjacent to the northeast of the site repaired aircraft turbine engines.
- A high-powered petroleum pipeline owned by Chevron runs parallel to the site. In 2012, a release of crude oil was reported at 2001 West Rosecrans Avenue, east of the site, beneath the sidewalk on the north side of West Rosecrans Avenue. Groundwater monitoring is being conducted at the location.

4.3 Review of Local and State Agency Information

Ramboll contacted local governmental agencies and regulatory bodies for information relating to the site. An overview of the findings of this review is presented in Table 5.

Table 5: Local Agency Information for the Site

Agency Contacted/ Document Reviewed	Information Obtained
Los Angeles County Department of Public Works (LA Co DPW)	LA Co DPW files included a UST removal report in 2005, clarifier inspections, violations for rain diversion system, and violations for excessive oil spots in the north side of the back of the repair shop building. In November 2006, the LA Co DWP approved the closure for a 3,000 gallon four-compartment UST. See below for more information.
County of Los Angeles Fire Department	An information request was submitted to the County of Los Angeles Fire Department. Records from the fire department include inspection reports and violations associated with failure to properly label, store and report hazardous wastes onsite at the 2129 address. No outstanding violations were reported. Records for the 2010 address include information regarding the metal-contaminated soil removed from the site in 1992. A copy of the No Further Action was granted by the LA Co FD in a letter dated September 1992. No closure information was obtained regarding the former USTs located in the vacant portion of the site and removed prior to 1991. However, soil sampling near the former UST was conducted and is further discussed in section 1.4.

Table 5: Local Agency Information for the Site

Agency Contacted/ Document Reviewed	Information Obtained
City of Gardena Building Department	An information request was submitted to the City of Gardena Building Department. According to the response provided, various electrical permits, reroofing, spray paint booth installation and sewer connection permits were associated with the site from 1989 through 2011. A permit was issued to the site to remove one 3,000-gallon four-compartment UST in 2005. The UST was removed in 2005 and received closure by the LA Co DPW in November 2006.

4.4 Previous Environmental Assessments and Activities

Based on a review of historical site documents and interviews with facility personnel, the following prior environmental assessments, limited environmental sampling, and geotechnical investigations are known to have been conducted at the site. Copies of pertinent environmental documentation is provided in Appendix D.

- **1992 Soil Removal Report.** Onsite soil sampling as a part of a Remedial Investigation/Feasibility Study performed by Cal Science Engineering in July 1991, revealed soil contaminated with elevated concentrations of metals. Pursuant to the sampling activities, Chemical Waste Management (CWM) were contracted by Cal-State Metals to load stockpiled contaminated soils and transport the soil to a treatment/disposal facility in Kettleman City, California. CWM would then backfill, grade and compact the excavation areas. Oversight was provided by the Environmental Management Department of the County of Los Angeles. Two large areas (approximately 200 feet by 50 feet and 200 feet by 75 feet to approximately 4 feet below grade surface) in the northern portion of the site were excavated and segregated into two stockpiles. Approximately 1,430 tons of contaminated soil were removed from the site for disposal under the LA Co FD Hazardous Waste Control Program. A review of the Fulcrum 2017 report indicated a closure letter was issued by the LA Co FD to Cal State Metals in September 1992. The closure letter indicated the site had been satisfactorily mitigated for its current commercial/industrial use. A "Deed Notification" was issued to the site in September 1992 and signed by Herman J Megdal, Jerome J. Medgal and Rose Medgal. The purpose of the Deed Restriction was to notify future owners of the soil contamination mitigation conducted onsite. A more sensitive population use would require additional remediation or investigation.
- **2005 Underground Storage Tank Removal and Closure Report.** In April 2005, one 3,000 gallon four-compartment UST was removed from the site by Environmental Support Technologies, Inc (EST). The four compartments contained motor oil, automatic transmission fluid, waste oil and waste water. The tank was removed under the oversight of the LA Co DPW. Three confirmation soil samples were collected from the excavation under the oversight and per direction of the on-site LA Co DPW staff. The samples were analyzed for TPH via EPA Method 418.1 and EPA Method 8015M, as well as VOCs using EPA Method 8260B. The soil results did not indicate detectable levels of TPH or VOCs.

Closure was granted to the site for the UST removal by the LA Co DPW in November 2006. No further action was required.

- **2017 Subsurface Investigation.** In October and November 2017, the 2017 Fulcrum report indicates FR advanced 25 soil borings using a Geoprobe to a maximum depth of 25 feet bgs in areas of suspected hazardous materials use. A soil vapor probe was installed to 5 ft bgs at all 25 locations. Soil borings drilled in the areas next to two onsite clarifiers, the former UST areas and the areas of hazardous materials use were analyzed for Total Petroleum Hydrocarbons (TPH) as gas, diesel, oil, VOCs and Title 22 Metals. Soil borings advanced at the former excavation and stockpile areas were analyzed for semi-volatile organic compounds (SVOCs) and PCBs. All soil vapor samples were analyzed for VOCs. Soil samples collected at the former excavation stockpiled areas returned with concentrations of PCBs which exceeded RWQCB Environmental Screening Levels (ESLs) largely in the shallow samples. Acetone and methyl-tributyl-ether (MTBE) concentrations were detected below RWQCB ESLs in three-foot samples collected in and around the repair shop area. No other VOCs were detected onsite. Three-foot soil samples collected around the repair shop area returned with concentrations of TPH oil [2,650 milligrams per kilograms (mg/kg)] and TPH diesel (380 mg/kg) that were below commercial use ESL's. Elevated chromium, cadmium, copper, nickel and zinc were evaluated however FR determined them to be within the expected background levels. Lead concentrations (361 mg/kg) were determined to be below US Environmental Protection Agency (EPA) Regional Screening Levels for commercial use. PCBs contaminant levels in the soil at the former stockpiled area appeared to be limited in depth and was not anticipated to be a threat to groundwater. Soil vapor concentrations of TCE (1.23 µg/L) and vinyl chloride (17.8 µg/L) exceeded the RWQCB ESLs. However, FR reported that concentrations of TCE in soil vapor at the property did not exceed the cancer target risk established in the DTSC Human and Ecological Risk Division (HERD) soil vapor screening model. FR concluded that the elevated levels of vinyl chloride were residual levels in an isolated area in the formerly remediated zone and would therefore not pose a significant risk based on a commercial use of the site. FR recommended additional soil screening and testing at the site if soil removal was necessary for redevelopment/grading, however no other recommendations, action or assessment was reported.
- **2018 Leighton & Associates**. In August 2018, Leighton & Associates conducted soil, soil gas and groundwater sampling at the site. Laboratory analytical reports were provided to Ramboll, however, a subsurface investigation report was not made available. Leighton & Associates contracted with Jones Environmental Inc to analyze soil vapor samples collected at the site and contracted with Advanced Technology Laboratories to analyze soil and groundwater samples collected at the site. Jones Environmental Inc laboratory reports indicated twelve soil vapor samples were submitted for analysis using USEPA Method 8260B for VOCs and USEPA Method 8015B. VOCs and TPHg were detected above reporting limits. Maximum concentrations of detected chemical compounds included benzene [0.160 micrograms per liter (µg/L)], 1,1-dichloroethane (22.7 µg/L), 1,1-dichloroethene (2.27 µg/L), ethylbenzene (0.111 µg/L), tetrachloroethene (2.71 µg/L), toluene (0.506 µg/L), trichloroethene (31.8 µg/L), vinyl chloride (20.3 µg/L) and TPHg (172 µg/L).

  Advanced Technology Laboratories reports indicated ten soil boring locations were advanced and sampled at a maximum depth of approximately 30 ft bgs. Soil samples

analysis included TPH as gas, diesel, PCBs, and Title 22 Metals. Soil samples reported maximum contamination of TPH diesel (4,100 mg/kg), PCBs [12,000 micrograms per kilogram µg/kg)], 1,1-dichloroethane (16.0 µg/kg), trichloroethene (45 µg/kg) and tetrachloroethene (13 µg/kg). Groundwater samples reported included maximum concentrations of tetrachloroethene (250 µg/L), trichloroethene (78 µg/L), and TPH diesel (0.59 mg/L). Metal samples reported elevated concentrations of several metals including but not limited to lead, cobalt and zinc.

- **2018 Supplemental Phase II Subsurface Investigation.** In October 2018, Fulcrum Resources Environmental (FR) conducted soil, soil gas and groundwater sampling at the site. A total of 20 boil borings were advanced to a maximum depth of 30 feet bgs. Analysis for the soil samples included Title 22 Metals, PCBs, VOCs and TPH as diesel and oil. Ten of the soil samples were also analyzed for hexavalent chromium and two samples with elevated total lead were analyzed for soluble threshold limit concentration (STLC) lead. Soil vapor probes were installed at depths up to 22 feet in eight of the soil borings. Soil vapor samples were analyzed for VOCs. Seven of the soil borings were advanced to collect groundwater samples. Groundwater analysis included VOC's and hexavalent chromium. Results of the soil sampling indicated one sample of cobalt above the RWQCB ESLs. Several shallow soil samples exceeded ESLs for lead, hexavalent chromium, PCBs and TPH/MTBE. Elevated concentrations of PCE and TCE were detected in soil vapor and groundwater. Soil vapor samples indicted a correlation between elevated PCE in groundwater from a possible off-site release. PCE vapor was found in higher concentrations at the deeper soil vapor probes in the northern portion of the site. Groundwater sampling also showed higher PCE concentrations along the northern perimeter of the site.

4.5 User-Provided Information

Ramboll provided Gardena 40 with a User Questionnaire (consistent with Appendix X3 of the ASTM Standard) that requested information relating to environmental liens, AULs, specialized knowledge of the property, property value diminution, chain-of-title, or any other commonly known or obvious indications of site contamination. Gardena 40 did not provide any information that was not otherwise obtained and reviewed by Ramboll.

5. SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

Ramboll conducted a visit to the site on January 21, 2019. During the site visit, observations of both the interior of the building and exterior portions of the site were made to evaluate if any RECs, as defined in Chapter 2, are present.

5.2 General Site Setting and Observations

Ramboll made observations concerning all of the interior and exterior issues specified in Sections 9.4.2 through 9.4.4 of the ASTM E1527-13 Standard. The presence or absence of each issue of environmental interest or concern is noted in Table 6. Additional information regarding observed and historical items is provided in the sections following the table.

Table 6: Summary of Site Reconnaissance Observations

ASTM Section	Issue	Observation
Interior and Exterior Issues		
9.4.2.1	Current use(s) of the property	See Section 3.2
9.4.2.2	Past use(s) of the property	See Section 4.2
9.4.2.3	Hazardous substances and petroleum products used, treated, stored, disposed of, or generated on the property in connection with identified present or past uses	**Present** (see Section 5.2.1)
9.4.2.4	Storage tanks: Underground storage tanks (fill ports, vent pipes, manholes) Aboveground storage tanks	 Formerly Present (see Section 4.2.1 and 4.3) **Present** (see Section 5.2.1)
9.4.2.5	Odors (strong, pungent or noxious)	Absent
9.4.2.6	Pools of liquid, standing surface water or sumps	**Present** (see Section 5.2.4)
9.4.2.7	Drums of hazardous substances or petroleum products (five-gallon, 55-gallon or totes)	**Present** (see Section 5.2.1)
9.4.2.8	Hazardous substance and petroleum product containers (not necessarily in connection with identified uses)	Absent
9.4.2.9	Unidentified substance containers suspected of containing hazardous substances or petroleum products	**Present** (see Section 5.2.1)

Table 6: Summary of Site Reconnaissance Observations

ASTM Section	Issue	Observation
9.4.2.10	Polychlorinated biphenyls (PCBs) Electrical equipment on-site (e.g., transformers, capacitors) Electrical equipment known or likely to contain PCBs Hydraulic equipment on-site (e.g., elevators, truck dock lifts) Hydraulic equipment known or likely to contain PCBs	(see Section 5.2.3) **Present** Absent Absent Absent
Interior Issues		
9.4.3.1	Heating/cooling systems	**Present** (see Table 1)
9.4.3.2	Stains or corrosion on interior floors, walls or ceilings (except for staining from water)	**Present** (see Section 5.2.3)
9.4.3.3	Floor drains and interior sumps	Absent
Exterior Issues		
9.4.4.1	Pits, ponds or lagoons on property or adjacent sites	Absent
9.4.4.2	Stained soil or pavement	**Present** (see Section 5.2.5)
9.4.4.3	Stressed vegetation (from other than insufficient water)	Absent
9.4.4.4	On-site solid waste disposal; areas apparently filled or graded by non-natural causes; or mounds or depressions suggesting solid waste disposal	Formerly Present (see Section 4.2.1)
9.4.4.5	Wastewater or other liquid (including storm water) or any discharge into a drain, ditch, underground injection system or stream on or adjacent to the property	**Present** (see Section 5.2.4)
9.4.4.6	Wells (including dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	Absent
9.4.4.7	Septic systems or cesspools	Absent
Non-Scope Considerations		
N/A	Asbestos Containing Materials	(see Section 5.2.6)
N/A	Lead-Based Paint	(see Section 5.2.7)

Table 6: Summary of Site Reconnaissance Observations

ASTM Section	Issue	Observation
N/A	Water Intrusion	(see Section 5.2.8)
N/A	Radon	(see Section 5.2.9)

Notes:

Observations noted in this table and discussed further below are based on information obtained during the site visit and from a review of the sources summarized in Section 4.

See the ASTM Standard for a detailed description of the issues included in each referenced ASTM section.

Per the ASTM Standard, fluorescent light ballasts likely to contain PCBs are not considered.

N/A – Not applicable.

5.2.1 Hazardous Substances and Petroleum Products

The primary chemicals used at the site include various 3-gallon sized containers of toluene ethyl acetate, acetone and lacquer primers as well as 1-gallon or smaller containers of automotive repair fluids, paint thinners, and blending solvents. During the site visit, Ramboll observed several dozen quart-sized containers of low VOC automotive paint, located throughout various locations within the repair shop. Although none of the chemicals were equipped with secondary containment, no evidence of release was observed in the chemical storage areas. Waste oil filters are collected in 55-gallon metal drums for removal by Alpha Oil Waste Management on an as-needed basis.

An apparent satellite waste storage area was observed in the northern portion of the repair shop area to the west of the paint booth. Three 55-gallon containers of hazardous waste were noted without secondary containment. The accumulation start date on one of the drums with a label indicated March 01, 2013. The contents reportedly were Non-RCRA hazardous waste liquid (aqueous cleaning solution) with a hazardous property of toxic liquid. The other two drums were unlabeled. One additional 55-gallon drum of engine oil was noted in the repair shop next to an unlabeled 55-gallon metal drum near the eye wash station.

In addition to the chemical listed above, janitorial services use maintenance-related materials, such as sanitizers and detergents, which are stored in the janitorial closets.

A pressurized Chevron petroleum pipeline runs parallel east to west adjacent to the site beneath the sidewalk area. No reported leaks have occurred along the pipeline adjacent to the site.

Household wastes are collected in dumpsters (general trash, recycling), which are positioned on pavement west of the building. No evidence of disposal of hazardous materials or releases was observed in this area.

5.2.2 Aboveground Storage Tanks

Several aboveground storage tanks (ASTs) are maintained at the site, as summarized in Table 7. Facility personnel reported that there are no current underground transfer lines used to convey the materials from the tanks.

Table 7: Summary of Aboveground Storage Tanks

Number and Size (gal.)	Contents	Location	Secondary Containment	Notes/Observations.
In Use				
1 x 200	Fresh motor oil	Outside, west of the building	Yes - double-walled	Slight staining on concreate and down sides of tank
2x275	Used oil	Outside, west of the building	Yes – metal dike	Slight staining on concrete
1x275	Waste Coolant	Outside, west of the building	Yes – metal dike	Slight staining on concrete
1x150	Fresh transmission fluid	Outside, west of the building	No	Inactive
1x50	Diesel fuel	Outside, west of the office building	Yes	Associated with the backup emergency generator
Former				
1 x 150	Transmission Fluid	Outside, west of the building	Unknown	No
1x275	Waste Coolant	Outside, west of the building	Unknown	No
2x275	Waste motor oil/waste transmission fluid	Unknown	Unknown	No
1	Argon, carbon dioxide	Inside, body shop area of the repair building	N/A, due to gaseous nature	Used with welding activities
1	Oxygen	Inside, body shop area of the repair building	N/A, due to gaseous nature	Used with welding activities

5.2.3 Polychlorinated Biphenyls

Facility personnel were not aware of on-site equipment that is known to contain PCBs. Two pole mounted transformers are present along the western edge of the site and are owned by Southern California Edison. Ramboll was not able to observe whether the units were labeled as to their PCB content. Ramboll observed no indication of leaks or releases from electrical equipment during the site visit. Because the installation date of the units is unknown and may predate the 1979 federal ban on the manufacture of PCBs, it is possible that the transformer oils contain PCBs. No indications of releases from the transformer units were observed.

Because the office building was constructed prior to the 1979 federal ban on the manufacture of PCBs, it is possible that hydraulic oils, or other types of electrical equipment, such as capacitors, contain PCBs. Ramboll observed no indication of leaks or releases from electrical equipment during the site visit.

5.2.4 Wastewater and Storm Water

Sanitary wastewater, which includes wastewater from bathrooms, and kitchen areas, is discharged to the municipal sanitary sewer system. The facility does not generate process wastewater.

Storm water at the site infiltrates into unpaved areas or sheet flows onto West Rosecrans Avenue. Parking lot storm water is channeled into one of two onsite three-stage clarifier systems which ultimately discharge to the municipal sewer system. According to facility personnel, the clarifiers are cleaned out when the LA Co DPW tells them it is necessary. Stormwater was observed ponded in the vacant parcel during the site visit due to a recent rainfall event.

5.2.5 Stained Soil or Pavement

Ramboll observed minor staining of petroleum and automotive fluid throughout the repair bays both indoor and outside the repair shop, in addition to the hazardous chemical storage area. The underlying asphalt and concrete appeared to be in good condition.

5.2.6 Asbestos Containing Materials

Although an asbestos inspection and sampling of suspect building materials in conformance with established protocols (as outlined in 40 CFR §763), applicable state or local regulations, or industry standards, were beyond our scope of work, Ramboll made limited visual observations[3] of representative building materials in those areas accessed during the site tour to identify readily apparent PACMs and suspect ACMs. OSHA's definition of PACMs is limited to thermal system insulation (TSI) and surfacing materials present in buildings constructed before 1981. Vinyl floor tiles are not considered PACM, but OSHA nonetheless requires that asphalt and vinyl floor tiles present in buildings constructed before 1981 be treated similarly to PACM. The term suspect ACM is not defined by OSHA but can include numerous building materials manufactured using asbestos currently or in the past (e.g., ceiling tiles, roofing materials, joint compound), as well as TSI, surfacing materials, and flooring materials installed after 1981.

[3] Ramboll did not observe all building materials or formally survey the facility to determine the presence and condition of PACM and suspect ACM.

- Given the date of construction of the earliest site building in 1976, it is possible that ACM are present in building materials. According to facility personnel, a formal asbestos survey has not been conducted at the facility. Ramboll conducted visual observations of limited areas of the site building and noted potential asbestos-containing material (PACM) (e.g., vinyl floor time). Ramboll noted suspect materials that may contain asbestos (e.g., drywall, roofing materials). The suspect ACM that were observed by Ramboll did not appear to be extensively damaged, broken or deteriorated.

There are no regulatory requirements to remove ACMs or evaluate whether building materials contain asbestos unless the materials are damaged and have the potential to release fibers or the materials have the potential to be disturbed during renovation or demolition activities. Ramboll did not observe any obviously damaged building materials.

5.2.7 Lead-Based Paint

Lead was a major ingredient in paint pigment prior to and through the 1940s. While other pigments were used in the 1950s, the use of lead in paint continued until the early 1970s. In 1978, the Consumer Products Safety Commission banned paint and other surfacing coating materials that are "lead-containing paint." Based on the construction date of the office site building in 1976, it is possible that lead-based paint was used historically on facility structures, however facility personnel indicated both the interior and exterior of the office building was repainted in 2010. Facility personnel were not aware of the presence of any lead-based paint on structures at the facility. Ramboll observed the paint to be in good condition.

5.2.8 Water Intrusion

Ramboll did not perform a mold survey at the site; however, facility personnel provided information regarding past water intrusion events. According to facility personnel, the site has not experienced issues with water intrusion other than occasional rooftop leaks due to seasonal rainfalls at the office building. During the site visit, a roofing crew was onsite on the office building resealing portions of the roof that had recently leaked during a rainfall event the previous week.

5.2.9 Radon

Based on information included in the environmental database report, the site is located in an area categorized as Zone 2, which has average indoor basement radon levels between 2 and 4 picoCuries per liter (pCi/L). The USEPA's continuous exposure limit, which is the limit at which further testing or remedial action is suggested, is 4.0 pCi/L. This USEPA continuous exposure limit applies to residential, not commercial, properties. According to the California Radon database, eight tests conducted in the same zip code as the site indicated that none exceeded a Radon value of greater than 4 pCi/L. A USEPA survey conducted in the same zip code as the site found that the average radon level of a first-floor room at one property was 0.711 pCi/L. Radon appears unlikely to represent an environmental concern and Ramboll recommends no further investigation regarding this issue.

5.2.10 Lead in Drinking Water

Drinking water is supplied to the site from the Golden State Water Company, and, therefore, would be expected to comply with state standards, such that lead is unlikely to be present at concentrations above those standards. According to the information reviewed (https://www.gswater.com/lead-drinking-water-standards/) the Golden State Water Company was compliant with Federal and State rules regulating lead in drinking water.

6. SUPPLEMENTAL SUBSURFACE INVESTIGATION

6.1 Scope of Work

As described herein, several historical Phase II subsurface investigations have been conducted at the site. Based on Ramboll's review of the historical data, several key issues of concern were identified that warranted additional investigation. Key issues identified for additional investigation included groundwater and soil vapor impacted by VOCs, and shallow soil impacted by PCBs, metals and TPH.

As described in Section 1, Ramboll conducted a limited subsurface investigation at the site that included collection of soil, soil vapor and groundwater samples. The objective of the supplemental subsurface investigation conducted by Ramboll was to further evaluate and characterize subsurface conditions at the site.

Prior to initiation of sampling activities, Ramboll contacted Underground Service Alert (USA) to mark the locations of all major utilities near the site boundaries. In addition to the services provided by USA, Ramboll contracted with Spectrum Geophysical (Spectrum) of Burbank, California, a private utility locating company, to conduct a geophysical survey in the immediate vicinity of the boring locations to identify subsurface structures or underground obstructions.

Ramboll also prepared a site-specific Health and Safety Plan (HASP). The HASP was designed to minimize exposure of Ramboll field personnel to potentially hazardous materials. All field personnel involved in the project were required to implement the procedures presented in the HASP while conducting the fieldwork.

In January 2019, BC2 Environmental and ABC Liovin Drilling Inc., under the oversight of Ramboll, advanced 38 borings at the site to depths ranging from approximately 5 to 30 feet bgs to selectively collect soil, soil vapor and groundwater samples as further described below.

All drilling activities were conducted under the direct supervision of a California-registered Professional Geologist and in compliance with the permits issued by the County of Los Angeles, Environmental Health Department.

6.1.1 Lithology and Hydrogeology

In the northern portion of the site, the lithology consisted of primarily silty sand from the surface to 2 feet bgs. Fill material with minor amounts of debris was encountered from surface to 4 feet bgs. Fine grained sediment consisting of interbedded silty clay and clay were documented from 4 feet bgs to the total depth drilled (approximately 30 feet bgs). In the vacant lot located in the southern portion of the site, fill material and debris was encountered from the surface to approximately 7 feet bgs. Predominantly silty sand was encountered from approximately 7 to 10 feet bgs, and the lithology consisted of interbedded silty clay and clay from approximately 10 to 30 feet bgs.

Groundwater was encountered at depths ranging from approximately 24.41 feet top of casing (TOC) in TW-4 to 25.84 feet TOC in TW-2. Based on the data collected in January 2019, groundwater flow towards the southeast.

6.1.2 Grab Groundwater Sample Collection and Analysis

Grab groundwater samples were collected from four temporary well locations (TW-1 through TW-4) using two-inch diameter polyvinyl chloride (PVC) temporary well casings which were installed using a direct push drill rig. Temporary well screens were pre-packed with slotted screens set from approximately 25 to 30 feet bgs. Samples were collected in laboratory-provided containers using disposable 0.5-inch diameter bailers.

Groundwater samples were labeled, sealed in zip-closure bags, stored in a cooler with ice and delivered to Eurofins CalScience (Eurofins) of Garden Grove, California, a fixed-base analytical laboratory under chain-of-custody documentation. All groundwater samples were analyzed for VOCs in accordance with USEPA Method 8260B and dissolved metals in accordance with USEPA methods 6010B/7171A. In addition, samples from TW-3 and TW-4 were analyzed for hexavalent chromium in accordance with USEPA method 3060A/7199. All groundwater samples to be analyzed for metals were filtered in the field prior to laboratory submittal.

6.1.3 Soil Vapor Probe Installation and Sampling

Dual nested soil vapor probes were installed in 14 locations throughout the site at depths of approximately 5 and 15 feet bgs. Vapor probe depths were adjusted in the field, as needed, based on lithology observation. Soil vapor probes were installed and sampled in general accordance with the "Advisory – Active Soil Gas Investigations", jointly developed by the California EPA (CAL EPA), DTSC, and LARWQCB/SFRWQCB, dated July 2015.

The soil vapor samples were collected and analyzed by Positive Lab Service's mobile lab under the supervision of Ramboll. The soil vapor samples were analyzed for VOCs by USEPA Method 8260.

6.1.4 Soil Sample Collection and Analysis

Soil borings were advanced using a combination of hand augering and direct push drilling technology. Soil samples were collected at depths ranging from 0.5 to 10 feet bgs. All drilling and soil sampling activities were conducted under the direct supervision of a California-registered Professional Geologist.

Soil samples were screened using visual and olfactory methods, and by using a photoionization detector (PID). Soil sample containers were labeled, sealed in zip-closure bags, stored on ice in an insulated container, and delivered to Eurofins under chain-of-custody documentation.

Soil samples were analysed for a variety of constituents, depending on the sample depth, field observations, and location. Soil samples were selectively analyzed for TPH as gasoline range organics (GRO), diesel range organics (DRO), and oil range organics (ORO) in accordance with USEPA Method 8015B, Title 22 Metals including hexavalent chromium in accordance with USEPA Methods 6020B/7471A and 3060A/7199, and PCBs in accordance with USEPA Method 8082.

6.2 Screening Criteria

The analytical results presented in this report were compared to applicable state and federal screening levels for industrial/commercial and residential land use. Soil sampling results are compared to USEPA and/or DTSC-modified residential Regional Screening Levels (RSLs). Arsenic screening values are based on a study "Determination of a Southern California

Regional Background Arsenic Concentration in soil" by the DTSC. Soil vapor screening thresholds were calculated as the ratio of USEPA indoor air regional screening thresholds (RSLs) and/or DTSC's HERO Note 3 values to default attenuation factors as recommended by Cal/EPA (2011). Groundwater analytical data was compared to the USEPA and California maximum contaminant levels (MCLs). The specific screening criteria used for soil, groundwater, and soil vapor constituents are further detailed in Tables 8 through 11.

6.3 Groundwater Sampling Results

Groundwater sampling results are summarized in Table 8 and sampling locations are presented on Figure 3. Laboratory analytical results are included in Attachment G.

Metals were either non-detect or detected at concentrations below their respective MCLs.

Several VOCs, including 1,1-dichloroethane (1,1-DCA), cis-1,2-DCE, PCE and TCE were detected above their respective MCLs. PCE and TCE were the most consistently detected compounds at elevated concentrations and are summarized below:

PCE was detected in all four groundwater samples collected at concentrations ranging from 82 µg/l in TW-4 to 2,400 µg/l in TW-2. The MCL for PCE is 5 µg/l.

TCE was detected in all four groundwater samples collected at concentrations ranging from 5.6 µg/l in TW-3 to 73 µg/l in TW-4. The MCL for TCE is µg/l.

6.4 Soil Vapor Sampling Results

Soil vapor sampling results are summarized in Table 9 and sampling locations are presented on Figure 4. Laboratory analytical results are included in Attachment G.

Several VOCs, including PCE, TCE, and vinyl chloride, were detected at concentrations above their respective screening levels. A summary of compounds detected above residential and commercial screening criteria is provided below:

6.4.1 Residential Scenario

- PCE was detected in one soil vapor sample (SV1-15) at a concentration of 9.17 µg/L, exceeding its residential screening threshold of 0.46 µg/L.
- TCE was detected in five soil gas samples (SV1-15, SV10-5, SV10-15, SV12-5 and SV12-15) at concentrations exceeding its commercial screening threshold of 0.48 µg/L. The exceedances ranged from 0.875 µg/L in SV10-5 to 19.6 µg/L in SV12-15.
- Vinyl chloride was detected in six soil gas samples (SV1-15, SV3-5, SV3-14.5, SV5-4.5, SV6-5 and SV12-15) at concentrations exceeding its residential screening threshold of 0.0095 µg/L. The exceedances ranged from 0.0177 µg/L in SV6-5 to 0.514 µg/L in SV3-14.5.

6.4.2 Commercial Scenario

- PCE was detected in one soil vapor sample (SV1-15) at a concentration of 9.17 µg/L, exceeding its commercial screening threshold of 4 µg/L.
- TCE was detected in one soil vapor sample (SV12-15) at a concentration of 19.6 µg/L, exceeding its commercial screening threshold of 6 µg/L.
- Vinyl chloride was detected one soil vapor sample (SV3-14.5) at a concentration of 0.514 µg/L, exceeding its commercial screening threshold of 0.32 µg/L.

6.5 Soil Sampling Results

Soil sampling results are summarized in Tables 10 and 11 and sampling locations are presented on Figure 5. Laboratory analytical results are included in Attachment G.

Several compounds including TPH, metals and PCBS were detected at concentrations above their respectable screening levels. A summary of compounds detected above residential and commercial screening criteria is provided below:

6.5.1 Residential Scenario

6.5.1.1 TPH

TPH gasoline range organics and oil range organics were either non-detect or detected at concentrations below their respective screening levels.

- TPH diesel range organics were detected in thirteen soil samples at concentrations exceeding its residential screening threshold of 96 mg/kg. The exceedances ranged from 140 mg/kg in SB22-0.5 to 900 mg/kg in SB2-5.

6.5.1.2 PCBs

- Aroclor-1248 was detected in six soil samples at concentrations exceeding its residential screening threshold of 230 µg/kg. The exceedances ranged from 370 µg/kg in SB24-2 to 1,700 µg/kg in SB20-5.
- Aroclor-1254 was detected in ten soil samples at concentrations exceeding its residential screening threshold of 240 µg/kg. The exceedances ranged from 280 µg/kg in SB5-5 and SB22-5 to 40,000 µg/kg in SB16-3.
- Aroclor-1260 was detected in two soil samples at concentrations exceeding its residential screening threshold of 240 µg/kg. The exceedances ranged from 340 µg/kg in SB24-2 to 550 µg/kg in SB14-0.5.

6.5.1.3 Metals

- Antimony was detected in one soil sample (SB20-5) at a concentration of 61.7 mg/kg, exceeding its residential screening threshold of 31 mg/kg.
- Arsenic was detected in two soil samples at concentrations exceeding its southern California background level of 12 mg/kg. The exceedances ranged from 12.2 mg/kg in SB27-5 to 19.5 mg/kg in SB23-2.
- Hexavalent chromium was detected in nine soil samples at concentrations exceeding its residential screening threshold of 0.3 mg/kg. The exceedances ranged from 0.41 mg/kg in SB23-5 to 1.8 mg/kg in SB7-2.
- Copper was detected in one soil sample (SB16-3) at a concentration of 4,000 mg/kg, exceeding its residential screening threshold of 3,100 mg/kg.
- Lead was detected in ten soil samples at concentrations exceeding its residential screening threshold of 80 mg/kg. The exceedances ranged from 82.9 mg/kg in SB12-2 to 401 mg/kg in SB16-3.
- Mercury was detected in one soil sample (SB16-3) at a concentration of 1.89 mg/kg, exceeding its residential screening threshold of 1 mg/kg.

6.5.2 Commercial Scenario

6.5.2.1 TPH

TPH gasoline range organics and oil range organics were either non-detect or detected at concentrations below their respective screening levels.

TPH diesel range organics was detected in thirteen soil samples at concentrations exceeding its commercial screening threshold of 440 mg/kg. The exceedances ranged from 140 mg/kg in SB22-0.5 to 900 mg/kg in SB2-5.

6.5.2.2 PCBs

- Aroclor-1248 was detected in two soil samples at concentrations exceeding its commercial screening threshold of 950 µg/kg. The exceedances ranged from 1,400 µg/kg in SB20-2 to 1,700 µg/kg in SB20-5.
- Aroclor-1254 was detected in one soil sample (SB16-3) at a concentration of 40,000 µg/kg, exceeding its commercial screening threshold of 950 µg/kg.

6.5.2.3 Metals

- Arsenic was detected in two soil samples at concentrations exceeding its southern California background level of 12 mg/kg. The exceedances ranged from 12.2 mg/kg in SB27-5 to 19.5 mg/kg in SB23-2.
- Lead was detected in one soil sample (SB16-3) at a concentration of 401 mg/kg, exceeding its commercial screening threshold of 320 mg/kg.

6.6 Site Investigation Conclusions

Based on the results of the supplemental soil, soil vapor and groundwater sampling conducted as part of this subsurface investigation, Ramboll concludes the following:

1. VOCs, primarily PCE and TCE, are present in groundwater at the site at concentrations exceeding MCLs. The highest concentrations of VOCs in groundwater were identified in the northeastern portion of the site. Based on historical site operations, the site-specific groundwater flow direction, and the distribution of VOCs in groundwater, the impacted groundwater appears to be originating at an off-site, hydrologically upgradient source.
2. Several VOCs including PCE, TCE and vinyl chloride, were detected in soil gas above applicable screening levels at the site. The soil vapor concentrations are likely the result of off-gassing from the impacted groundwater flowing onto the site from the north. As a precautionary measure, vapor barriers may be required for future development at the site.
3. Several soil hotspots containing elevated concentrations of TPH, metals, and PCBs, are present in shallow soil at the site at concentrations exceeding applicable screening levels under residential and commercial land use scenarios. As part of the planned site re-development activities, the impacted soil areas should be managed in a manner that is protective of human health, the environment, owner liability, and in compliance with Federal, State and local regulations and under a regulatory oversight program.

7. FINDINGS, OPINION, AND CONCLUSIONS

Ramboll performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-13 of the site in April 2018. The objective of the ESA was to identify RECs, as defined in the ASTM Standard. A list of key definitions presented in the ASTM Standard is provided in Section 8 at the end of this report. Any exceptions to, or deletions from, this practice are described in Section 7.2.

7.1 Findings, Opinions, and Conclusions

7.1.1 Recognized Environmental Conditions

This assessment has revealed no evidence of RECs in connection with the site, other then the following:

On-site Soil Impacts. There are known impacts to soil by heavy metals, polychlorinated biphenyls (PCBs), petroleum and aromatic hydrocarbons, and to a lesser extent methyl tert-butyl ether (MTBE) at the site. The site was previously used for automotive metal wrecking and salvage from the 1950s through the 1980s. During this time period, multiple piles of scrap metal, abandoned automobiles, above-ground storage tanks (ASTs) and underground storage tanks (USTs) and machinery were located on the site. Metal-impacted soil was excavated and removed from the site in the 1990s, and a closure letter was issued for the site by the Los Angeles County Fire Department (LACoFD) for satisfactory mitigation for the site under a commercial land use scenario in 1992; however, closure was not granted for residential land use.

Additional site-wide soil sampling was conducted by Fulcrum Resources Environmental (FR) in 2017 and by Leighton & Associates in 2018, which revealed the presence of elevated concentrations of metals, PCBs and total petroleum hydrocarbons (TPH) above commercial screening levels. FR recommended the removal of shallow soils with impacted elevated metals, PCBs, petroleum hydrocarbons and aromatic hydrocarbons/MTBE at various locations. Ramboll's 2019 limited subsurface investigation further delineated the impacted soils. The results of Ramboll's limited subsurface investigation are further discussed in Section 6.

Groundwater Contamination from an Upgradient Source. Groundwater investigations conducted at the site indicate that VOC-impacted groundwater has migrated onto the site from an unknown, hydrologically upgradient source or sources located to the north of the site. No evidence generated to date indicates that the site has caused or contributed in any significant way to the groundwater impacts. According to the State of California's GeoTracker website, three properties located northwest and upgradient of the site are under evaluation by the Regional Water Quality Control board (RWQCB) as potential sources of contamination in the vicinity of the site. The three properties are all automotive repair and maintenance facilities. All three properties appear on the historical automotive database from at least 1995, with one property being listed as historical automotive repair facility since 1964. Letters requesting current and former chemical use were issued by the RWQCB to the properties located at 2142 West 139th Street, 13906 and 13908 Van Ness Avenue in January 2018. No further information regarding any responses from these entities was obtained.

In addition, the property directly to the north of the site, identified as Real Soda Company, historically was listed under various companies including a graphics arts and printing shop,

which were documented to have used chlorinated solvents. The 99,952 square-foot building was constructed in 1966 and was most likely first occupied by the So Cal Carton Co Inc (the Carton Company). The Carton Company occupied the site from at least 1968 to approximately 1985. Records obtained from the South Coast Air Quality Management District (SCAQMD) indicated equipment associated with the Carton Company included drying ovens, roller coaters, printing presses and an application for a Rule 1130(C) permit. Rule 1130(C) pertains to reducing VOC emissions from graphic arts operations. The Standard Industrial Classification (SIC) code for the Carton Company is 5113, which includes industrial and personal service paper. The business name listed for the site in 1971 through 1981 includes Graphic Arts Packaging Corp in addition to the Carton Company. The Carton Company appeared to be out of business by 1985. The Hawthorne Printing Company and A Letter Press Shop are listed as occupants at the property in 1995. Hawthorne Printing Company is listed in the California Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System database for generating hazardous waste from 1993-2005, including alkaline solutions, photo chemicals, liquids with halogenated organic compounds, silver, and PCE. The Hawthorne Printing Company also had an inspection permit issued by the Los Angeles County Department of Public Works (LA Co DPW) Industrial Waste department. California Concepts Inc and A Letter Press Shop are both listed at the site from 1995 to 2001. From 2010 to present day, the Real Soda In Real Bottles company is listed at the property. If contamination associated with off-site properties is found to have migrated onto the subject site, it is expected that any remedial activities would be the responsibility of the entity(ies) named in the listing or other designated responsible party and not Gardena 40.

Vapor Intrusion Risk. The subsurface investigations conducted by previous consultants and by Ramboll indicate the presence of elevated VOCs in soil vapor exceeding regulatory screening levels throughout several portions of the site. The primary chemicals of concern identified are VOCs, in particular, PCE, TCE, and vinyl chloride. The impacts in soil vapor appear sporadic and primarily confined to the eastern portion of the site, overlying the area of impacted groundwater. In addition, the concentrations generally appear to increase with depth. The presence of elevated VOCs in soil vapor indicate a vapor intrusion concern, which may require mitigation as part of future development activities (*e.g.*, in the form of vapor mitigation systems).

7.1.2 2019 Supplemental Site Investigation

As described herein, several historical Phase II subsurface investigations have been conducted at the site. Based on Ramboll's review of the historical data, several key issues of concern were identified that warranted additional investigation. Ramboll conducted a limited subsurface investigation at the Site that included collection of soil, soil vapor and groundwater samples. The objective of the limited subsurface investigation was to further evaluate and characterize subsurface conditions at the site.

Ramboll advanced 38 borings at the site to depths ranging from approximately 5 to 30 feet below ground surface (bgs) to selectively collect soil, soil vapor and groundwater samples.

The analytical results were compared to applicable state and federal screening levels for industrial/commercial and residential land use. Soil sampling results are compared to USEPA and/or DTSC-modified residential Regional Screening Levels (RSLs). Soil vapor screening thresholds were calculated as the ratio of USEPA indoor air regional screening thresholds (RSLs) and/or DTSC's HERO Note 3 values to default attenuation factors as recommended by

Cal/EPA (2011). Groundwater analytical data was compared to the USEPA and California maximum contaminant levels (MCLs).

The results and findings from Ramboll's 2019 limited subsurface investigation are presented in Section 6 of this report and the conclusions are presented below:

1. VOCs, primarily PCE and TCE are present in groundwater at the site at concentrations exceeding MCLs. The highest concentrations of VOCs in groundwater were identified in the northeastern portion of the site. Based on historical site operations, the site-specific groundwater flow direction, and the distribution of VOCs in groundwater, the impacted groundwater appears to be originating at an off-site source.
2. Several VOCs including PCE, TCE and vinyl chloride were detected in soil gas above applicable screening levels at the site. The soil vapor concentrations are likely the result of off-gassing from the impacted groundwater flowing onto the site from the north. As a precautionary measure, vapor barriers may be required for future development at the site.
3. Several soil hotspots containing elevated concentrations of TPH, metals, and PCBs are present in shallow soil at the site at concentrations exceeding applicable screening levels under residential and commercial land use scenarios. As part of the planned site re-development activities, the impacted soil areas should be managed in a manner that is protective of human health, the environment, owner liability, and in compliance with Federal, State and local regulations and under a regulatory oversight program.

7.1.3 Other Findings

The term "other finding" is not defined by ASTM; rather, Ramboll uses the term to connote areas of contingent risk that are not clearly defined by the ASTM Standard. Ramboll did not identify any significant other findings, with the exception of the following:

7.2 Former Underground Storage Tanks (USTs).

No USTs are reported to remain onsite. Historically, three USTs were reportedly located on-site. One 3,000-gallon four-compartment UST, historically located in the northwestern portion of the site, was removed in 2005. No evidence of a release was identified at the time of the UST removal. The LA Co DPW granted closure for the removal of this UST in 2006.

Two additional USTs were historically located in the southeastern corner of the site, including a 2,000-gallon gasoline and 10,000-gallon diesel fuel USTs. These USTs were reportedly associated with former automotive wreckage activities conducted onsite by the former owner. The USTs were reportedly removed in 1991, however closure records pertaining to the removal were not available and were not identified through research conducted as part of this Phase I ESA. However, 2017 soil sampling conducted in this area by FR indicated no elevated levels of VOCs, PCBs, total petroleum hydrocarbons or benzene, toluene, ethylbenzene and xylene (BTEX). Soil samples were collected at four locations at 5 foot increments up to 15 feet bgs around the former UST area. Based on the results of the soil sampling conducted by FR and follow up soil vapor sampling conducted by Ramboll in 2019, the USTs do not appear to represent an environmental concern to the Site. Therefore, Ramboll does not consider the former USTs to present a REC and recommends no further investigation regarding this issue.

7.2.1 *De Minimis* Conditions

De minimis conditions are those that do not represent a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. Ramboll identified the following *de minimis* conditions related to the site:

- **Pavement Staining.** Ramboll observed multiple areas of exterior pavement where oil stains were apparent, approximately one to two square feet in size. The stains were limited in areal extent, the underlying pavement appeared to be intact, and no stains appeared to reach storm water drains. As such, Ramboll considers this matter to represent a *de minimis* condition.

7.2.2 Non-Scope Considerations

Ramboll identified the following findings that relate to non-scope considerations (as discussed in Section 2.2), as detailed below:

- **Asbestos-Containing Materials.** Given the date of construction of the earliest site building in 1976, it is possible that ACM are present in building materials. According to facility personnel, a formal asbestos survey has not been conducted at the facility. Ramboll conducted visual observations of limited areas of the site building but observed no potential asbestos-containing material (PACM) (e.g., thermal system insulation [TSI] associated with rooftop piping). Ramboll did note other suspect materials that may contain asbestos (e.g., drywall, roofing materials). The suspect ACM that were observed by Ramboll did not appear to be extensively damaged, broken or deteriorated.

  In addition, a portion of the Site has an asphalt paved parking and driveway areas. There is a potential that asbestos-containing materials, such as transite pipe and pavement reinforcement fabric (PRF) marketed as Petromat®, may be encountered within the paved areas and subsurface excavations/grading work at the Site. The tack coating often associated with PRF sometimes contains asbestos. As such, Ramboll recommends inspecting the asphalt for the presence of transite pipe and PRF and, if observed, sampling the materials for the presence of asbestos. If encountered, such identified materials should be abated in accordance with all applicable laws, including OSHA guidelines.

- **Water Intrusion.** Ramboll did not perform a mold survey at the site; however, facility personnel provided information regarding past water intrusion events. According to facility personnel, the site has not experienced issues with water intrusion other than occasional rooftop leaks due to seasonal rainfalls at the office building. During the site visit, a roofing crew was onsite on the office building resealing portions of the roof that had recently leaked during a rainfall event the previous week. Ramboll identified no mold growth at the site.

- **Lead-Based Paint.** Lead was a major ingredient in paint pigment prior to and through the 1940s. While other pigments were used in the 1950s, the use of lead in paint continued until the early 1970s. In 1978, the Consumer Products Safety Commission banned paint and other surfacing coating materials that are "lead-containing paint." Based on the construction date of the office site building in 1976, it is possible that lead-based paint was used historically on facility structures, but facility personnel indicated both the interior and exterior of the office building was repainted in 2010. Facility

personnel were aware of no presence of any lead-based paint on structures at the facility. Ramboll observed the paint to be in good condition.

- **Radon.** Based on information included in the environmental database report, the site is located in an area categorized as Zone 2, which has average indoor basement radon levels between 2 and 4 picoCuries per liter (pCi/L). The USEPA's continuous exposure limit, which is the limit at which further testing or remedial action is suggested, is 4.0 pCi/L. This USEPA continuous exposure limit applies to residential, not commercial, properties. According to the California Radon database, eight tests conducted in the same zip code as the site indicated that none exceeded a Radon value of greater than 4 pCi/L. A USEPA survey conducted in the same zip code as the site found that the average radon level of a first-floor room at one property was 0.711 pCi/L. Ramboll concludes that radon appears unlikely to represent an environmental concern to the site and recommends no further investigation regarding this issue.
- **Lead** in Drinking Water. Drinking water is supplied to the site from the Golden State Water Company, and, therefore, would be expected to comply with state standards, such that lead is unlikely to be present at concentrations above those standards. According to the information reviewed (https://www.gswater.com/lead-drinking-water-standards/) the Golden State Water Company was compliant with Federal and State rules regulating lead in drinking water.

7.3 Analysis of Data Gaps

The ASTM Standard defines a data gap as "a lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information." A data gap is only significant if other information obtained during the ESA, or professional experience, raises reasonable concerns and affects the ability of the environmental professional to identify whether a given issue is a REC. The ASTM Standard requires that the ESA report identify and comment on significant data gaps.

Limiting conditions and deviations to the ASTM Standard for the assessment are discussed below.

- Due to safety and ongoing maintenance constraints, Ramboll was not able to inspect the roof of the office or repair shop roof.

None of the exceptions, deletions, deviations, or site reconnaissance limitations noted above are considered to represent significant data gaps, and none are likely to affect the conclusions or recommendations of this report.

8. REFERENCES

8.1 Documents

Chemical Waste Management, Inc, ENRAC Division. 1992. "Cal-State Metals Contaminated Soil Removal Project Final Report."

Environmental Data Resources (EDR). 2019. "Certified Sanborn® Map Report." January 15.

EDR. 2019. "EDR Historical Topographic Map Report." January 15.

EDR. 2019. "The EDR Aerial Photo Decade Package." January 15.

EDR. 2019. "The EDR Building Permit Report." January 15.

EDR. 2019. "The EDR-City Directory Abstract." January 15.

EDR. 2019. "The EDR-Environmental Lien and AUL Search." January 17.

EDR. 2019. "The EDR-Property Tax Map Report." January 15.

EDR. 2019. "The EDR Radius Map™ Report with GeoCheck January 15.

EDR. 2019. "Environmental Lien Search." January 15.

Environmental Support Technologies Incorporated. 2005. "Underground Storage Tank Removal and Closure Report." May 13.

Fulcrum Resources Environmental. 2017. "Phase II Subsurface Investigation at 2101 & 2129 West Rosecrans Avenue, Gardena, California" December 11.

Fulcrum Resources Environmental. 2018. "Estimated Remediation Costs, 2101 & 2129 West Rosecrans Avenue, Gardena, CA" April 5.

Fulcrum Resources Environmental. 2018 "Supplemental Phase II Subsurface Investigation at 2101 & 2129 West Rosecrans Avenue, Gardena, California." December 24.

8.2 Interviews

Boris Hristev. Administrative Services Co-Op. 2019. Personal interview. January 21.

Gary Zinshteyn. Citizen Automotive. 2019. Personal interview. January 21.

9. ASTM DEFINITIONS

The following definitions are presented in the ASTM Standard:

REC - Recognized Environmental Condition:

The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.

CREC - Controlled Recognized Environmental Condition:

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

HREC - Historical Recognized Environmental Condition:

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.

De minimis Condition:

A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

Data Gap / Significant Data Gap:

A lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information. A data gap is significant if other information and/or professional experience raises concerns involving the data gap.

Please note that the term "other finding" is not defined by ASTM; rather, Ramboll uses the term to connote areas of contingent risk that are not clearly defined by the ASTM Standard.