



ATTACHMENT NO. 6

Rincon Consultants, Inc.

250 East 1st Street, Suite 1400
Los Angeles, California 90012

213 788 4842

info@rinconconsultants.com
www.rinconconsultants.com

January 4, 2022

Project No: 21-12246

Sebastian Scalora
Jushi Holdings, Inc.
301 Yamato Road
Boca Raton, Florida 33431

Via email: sscalora@jushico.com

**Subject: Soil Management Plan
Beyond/Hello Project
3800 Sepulveda Boulevard
Culver City, California**

Dear Mr. Scalora:

Rincon Consultants, Inc. has prepared this Soil Management Plan (SMP) for the site located at 3800 Sepulveda Boulevard in Culver City, California. This SMP has been prepared on behalf of Jushi Holdings, Inc. in accordance with the Proposal to Prepare a Soil Management Plan for Beyond/Hello Project at 3800 Sepulveda Boulevard in Culver City, California, dated November 23, 2021.

Rincon has reviewed available documents pertaining to the planned construction of retail/commercial space at 3800 Sepulveda Boulevard, and this SMP provides guidance regarding management of potentially impacted soils that may be encountered during construction activities. This SMP provides methodology and protocols to properly handle, store, transport, and dispose impacted soil in accordance with federal, state, and local regulations.

If you have any questions, or if we can be of further assistance, please contact us.

Sincerely,

Rincon Consultants, Inc.

R. Scott English, RME
Senior Program Manager

Ryan Thacher, PhD, PE
Director, Site Assessment and Remediation

Daniel Correia, GIT
Geologist



Soil Management Plan

Beyond/Hello Project
3800 Sepulveda Boulevard Culver
City, California

prepared for
Jushi Holdings, Inc.

prepared by
Rincon Consultants, Inc.

January 4, 2022

Table of Contents

Introduction.....	1
Site Background.....	2
Summary of Previous Investigations	2
Summary of Remedial Activities.....	2
Potential Constituents of Concern.....	3
Anticipated Grading Activities	3
Physical Setting.....	4
Geology and Hydrogeology	4
Charnock Well Field	4
Pre-Field Activities	5
Permitting	5
Agency Correspondence.....	5
Utility Notification	6
Soil Management During Grading Activities.....	7
Identification of Impacted Soil.....	7
Method Detection Limits	10
Transportation Requirements and Procedures	10
Shipment Documentation and Record Keeping	12
Reporting	14
Limitations	15
References.....	16

Figures

- Figure 1 Vicinity Map
- Figure 2 Site Map
- Figure 3 Proposed Building Footprint, Groundwater Monitoring Wells, and Historical Retail Facility Locations

This page intentionally left blank.

Introduction

Rincon Consultants, Inc. (Rincon) has prepared this Soil Management Plan (SMP) on behalf of Jushi Holdings, Inc. for the property located at 3800 Sepulveda Boulevard, Culver City, California (site) (Figure 1, Vicinity Map). The site was historically occupied by a former Mobil gasoline service station. Tanks and associated underground piping had been removed since at least 2005. The site is associated with an open Leaking Underground Storage Tank (LUST) case which is currently under verification monitoring. Remedial activities have been conducted, including soil vapor extraction and groundwater extraction. Current phase of the project is groundwater monitoring and sampling/post-remediation monitoring. Jushi Holdings, Inc. plans to redevelop the site and construct a single-story retail space with adjoining parking lot.

This SMP presents methodology and protocols to properly handle, store, transport, and dispose impacted soil that may be encountered during subsurface work performed at the site in accordance with federal, state, and local regulations.

Site Background

The site is a 0.85-acre parcel located east of Sepulveda Boulevard and south of Venice Boulevard in Culver City, California (Figure 2, Site Map). The site is identified as 3800 Sepulveda Boulevard and Assessor's Parcel Number (APN) 4213-018-014. The site currently consists of an asphalt-paved, vacant lot, and is located in an area that is primarily composed of residential and commercial land uses. Properties in the vicinity of the site include gasoline stations, commercial businesses, single-family residences, and multi-family residences. The Los Angeles Regional Water Quality Control Board (LA-RWQCB) environmental case (#I-07021) was opened at the site on August 9, 1990, after an unauthorized release was reported following the removal of four underground storage tanks (USTs). Four additional USTs and five fuel dispensers were removed in 2000. Impacts identified at the site are total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs).

Summary of Previous Investigations

Between August 1990 and November 2001, several sampling programs were conducted to evaluate soil and soil vapor at the site. These sampling events are detailed in the following documents:

- *Confirmation Soil Sampling Report for Mobil Service Station #18-FX5, 3800 Sepulveda Boulevard, Culver City, California.* 19 November. URS Corporation (URS). 2004a.
- *Subsurface Investigation for MTBE, Mobil Service Station #18-FX5, 3800 Sepulveda Boulevard, Culver City, California* prepared by Woodward-Clyde, February 1998.

Previous site investigation reports older than 2014 are not currently uploaded to the State Water Resources Control Board online database Geotracker and are not available for review. The specific site conditions prior to remedial activities are extrapolated from available remedial activity reports. Previous remedial activities at the site are detailed in the next section.

Summary of Remedial Activities

A soil vapor extraction (SVE) system was operated at the site from May 1999 to May 2001. During this time the SVE unit removed approximately 140.4 gallons of petroleum hydrocarbon free product, 14,886 pounds (lbs) of total petroleum hydrocarbons gasoline range (TPH-g), 305 lbs of methyl-tert-butyl-ether (MTBE), and 85 lbs of benzene. A groundwater pump-and-treat system was concurrently operated between November 1999, and September 2004 and removed and treated approximately 54.6 million gallons of groundwater (URS 2004a).

During May and August of 2000, the retail station fuel dispensers, USTs, and associated piping were removed from the site. Limited remedial over-excavation was performed, removing approximately 100 cubic yards of TPH impacted soil beneath the easter fuel dispensing island. Upon completion of UST removal activities, thirteen dual nested soil vapor extraction wells were installed to enhance the SVE system.

Following SVE implementation and rebound testing completed in 2003, the soil vapor sample analytical results were favorable to site closure, with no detections of TPH-g, benzene, toluene, ethylbenzene, MTBE, ethyl tert-butyl ether (ETBE), diisopropyl ether (DIPE), tert amyl methyl ether (TAME), and tert-butyl alcohol (TBA). The only chemical of concern detected during the rebound

test was xylene at a maximum concentration of 3.7 micrograms per liter ($\mu\text{g/l}$). Therefore, URS requested the SVE system be permanently shut down and confirmation soil matrix samples be collected, based on the rebound sample analytical results and asymptotically low mass removal rate (URS 2004b).

Soil borings were subsequently advanced at the site in 2004, and the soil matrix analytical results from the investigation indicated that SVE was effective in reducing concentrations of absorbed-phase hydrocarbons. The current phase of the project is groundwater monitoring and sampling/post remediation monitoring

A work plan to abandon select wells onsite and offsite wells which are no longer part of the groundwater monitoring network was approved by the LA-RWQCB in March 2020. Groundwater monitoring well destruction activities are summarized in the Well Abandonment Report (ETIC 2020). Remaining onsite wells B-11 and WC-6 were not approved for destruction and are required to be maintained during the course of redevelopment activities.

Potential Constituents of Concern

Based upon the site history as operating a retail gasoline station, site characterization, and completed remedial activities of soil and soil vapor, the following contaminants were identified as potential constituents of concern: TPH-g, diesel (d), and oil (o), benzene, MTBE, and TBA. Although remedial activities have removed a sufficient quantity of these constituents from the soil and soil vapor, it should be noted that detectable quantities potentially remain onsite and may be discovered during redevelopment activities. In the event that these constituents are encountered, this SMP provides guidelines for soil management.

Anticipated Grading Activities

The site is 13,001 square feet and consists of an asphalt-paved, vacant lot. The site will be redeveloped with a 3,802 square foot retail building and related site improvements including trees and new paved asphalt parking lot. Soil grading activities are anticipated to extend to 5 feet below ground surface (bgs) prior to construction, followed by subgrade utility installations post construction. It is anticipated that approximately 10 cubic yards of fill will be imported to the site, and up to approximately 10 cubic yards of soil will be exported from the site.

If impacted soil is encountered, discussions will need to occur to determine disposal or reuse options for the soil and could affect the total cut/export soil quantities. Soil profiling is discussed further in this SMP. It should be noted that impacted soil could adversely affect soil compaction rates and might not be suitable to onsite reuse. A geotechnical professional should be consulted about proposed reuse and compaction of potentially impacted soils.

The site has approximately 16 groundwater monitoring wells associated with the environmental case. To date, all but six of the wells have been destroyed, and of those six only two wells are located onsite. Wells B-11 and WC-6 are located in the existing parking lot along the southern boundary of the site. These wells are to be kept in-tact and undamaged during the course of the entire project. Measures will be executed to ensure these wells are not damaged in any way.

Physical Setting

Geology and Hydrogeology

Site Geology

According to the Geologic Map of the Beverly Hills and Van Nuys quadrangle (Dibblee 1991), the site is underlain by alluvial gravel, sand and silt-clay, derived mostly from Santa Monica Mountains, including gravel and sand of stream channels.

Regional Groundwater Occurrence and Quality

The site is located within the Coastal Plain of Los Angeles groundwater basin, Santa Monica subbasin. The Santa Monica subbasin underlies the northwestern part of the Coastal Plain of Los Angeles groundwater basin.

During the preparation of this SMP, we reviewed the California SWRCB's online GeoTracker database to determine groundwater depth and flow direction in the vicinity of the site. According to the *Site Status and Groundwater Monitoring Report First Quarter 2020, Former Mobil Service Station 18FX5, 3800 Sepulveda Boulevard, Culver City, California* prepared by ETIC and dated April 2020, depth to groundwater in the shallow aquifer ranged from 80.88 feet to 87.02 feet below the top of casing with a gradient reported to the southwest.

Charnock Well Field

The site is located upgradient of the Charnock Well Field MTBE Investigation area, approximately 1,000 feet east of the eastern boundary of the Well Field. The Charnock Well Field was operated by the City of Santa Monica, and in 1996 was forced to shut down one of the main well fields after discovering contamination in the form of gasoline additives MTBE, TBA, and other VOCs. The contaminants had leaked into the groundwater supply from USTs and product pipelines in the area surrounding the well field. The Charnock well field site encompasses a 10-acre parcel located in the City of Los Angeles. The Charnock well field site is located approximately 3.5 miles east of Santa Monica Bay, 4 miles south of the Santa Monica Mountains, and approximately 450 feet west of Interstate 405. The well field covers an area of approximately 450,000 square feet (10 acres) and is bounded by Sawtelle Boulevard to the east, Westminster Avenue to the south, Butler Avenue to the west and the Westwood Flood Control Channel (Westwood Channel) to the north.

A granular activated carbon treatment system operated at the site between November 1999 and September 2004 and removed a substantial amount of impacted groundwater associated with the Charnock Well Field. As such, impacted groundwater related to the Charnock Well Field is not anticipated to be encountered during construction activities at the site, as the current depth to groundwater was measured at approximately 80 ft bgs on 28 September 2021. The depth to groundwater is approximately 70 feet below the final excavation grade of this redevelopment.

As stated previously, the site is upgradient of the Charnock Well Field. However, due to the proximity of the site to the Charnock Well Field the City of Santa Monica has objection to this site being closed, as the perimeter groundwater monitoring wells are still part of the Charnock Well Field monitoring network.

Pre-Field Activities

This section describes tasks that should be completed prior to grading activities at the site.

Parties and Responsibilities

Title	Company	Primary Contact(s)	Responsibilities
Responsible Party and Property Owner	Jushi Holdings, Inc.	Sebastian Scalora sscalora@jushico.com	<ul style="list-style-type: none"> Review and approve work, complete waste manifests Arrange site access
Construction Site Manager	Project Management Consortium (PMC)	Tom Dougherty (916) 646-1437	<ul style="list-style-type: none"> Oversee onsite construction activities/excavations
Environmental Oversight Agency	LA-RWQCB	Weixing Tong (213) 567-6600	<ul style="list-style-type: none"> Review and approve environmental work plans and reports
Environmental Compliance	To Be Determined	To Be Determined	<ul style="list-style-type: none"> Review sampling results; coordinate field staff; prepare final report Collect excavation confirmation soil samples and stockpile samples for waste characterization
Analytical Laboratory	To Be Determined	To Be Determined	<ul style="list-style-type: none"> Analyze soil samples and complete laboratory quality control
Excavation and Hauling Contractor	To Be Determined	To Be Determined	<ul style="list-style-type: none"> Excavate and haul lead impacted soils

Permitting

Required permits shall be obtained by the building contractor prior to subsurface work being performed at the site. Permits that could be required include: a haul route, grading permit or encroachment permit from the Culver City Public Works Department, and in the event that impacted soil is expected to be encountered, a South Coast Air Quality Management District (AQMD) permit or notification may be required. The AQMD permit should be obtained prior to excavation and grading activities.

Based on available sample analytical data presented in the Confirmation Soil Boring Report (ETIC 2015), impacts in the subsurface were observed at a minimum depth of 15 ft bgs, which is deeper than the proposed excavation and grading depth of 5 ft bgs. However, the Low Threat Closure Plan (LCTP) checklist for this site indicates under the *Media Specific Criteria: Direct Contact and Outdoor Air Exposure* that the upper 10 feet of soil is not free of petroleum contamination.

If permits are required, an environmental professional should be retained for permitting management, including application, and maintenance of permits.

Agency Correspondence

LA-RWQCB will continue to be the lead oversight agency for the site as the site is still considered open as noted on the LCTP checklist "Additional Information" section which states that "this case should be kept OPEN in spite of meeting policy criteria", and as explanation LA-RWQCB noted "This

site is within the Charnock Well Field MTBE Investigation Project Area, City of Santa Monica... the City has objection to case closure due to TBA detection in groundwater.” LA-RWQCB should be notified prior to commencement of excavation activities and provided a copy of this SMP.

Utility Notification

Prior to the commencement of any subsurface work, the contractor will notify the Underground Service Alert (DigAlert.org) utility marking service as required by California law. The utility marking service identifies known utility locations in the public right of way but stops at the property boundary. As such, prior to the start of field work, the property owner will be asked if they know of any subsurface utilities in the proposed excavation areas, and existing as-built drawings will be reviewed to identify subgrade utilities. If the existence of utilities in the proposed excavation areas is known, then the property owner will be consulted to avoid damaging these known structures, including the onsite groundwater monitoring wells B-11 and WC-6.

Soil Management During Grading Activities

During excavation and grading activities, the contractor is anticipated to excavate and export up to approximately 10 cubic yards of soil. Due to the historical use of the site, potentially impacted soil could be encountered in the course of onsite construction activities. The proceeding sections describe protocols to identify impacted soil discovered during grading, monitor for impacted soil (if required) during grading, and how to properly characterize, handle, store, dispose of and manage confirmation soil sampling. If impacted soil is encountered, an environmental professional should be contacted to determine proper course of action. Furthermore, if impacted soil is encountered, workers handling the soil will be required to be 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) trained.

Identification of Impacted Soil

Field evidence of impacted soil includes and is not limited to staining or discoloration, unusual odors, an oily sheen, burned material, and/or debris. Onsite staff should be made aware to observe for these identifiable characteristics. Additionally, field instruments such as a photoionization detector (PID) can also be used assist in field identification of impacted soil by measuring VOCs in soil. If a PID is used onsite, the VOC readings should be taken by placing soil into a plastic zip-lock bag and closing the seal completely except for a small portion of which the PID tip will be inserted. PID readings in excess of 5 parts per million (ppm) as measured from the headspace could indicate the soil is impacted. Fuel releases such as gasoline, diesel, and motor oil tend to exhibit field evidence of contamination as described above, however impacts from elevated metals concentrations, chlorinated solvents, polycyclic aromatic hydrocarbons (PAHs), pesticides, and other contaminants may not exhibit field evidence of impacts.

If field evidence of impacted soil is encountered during subsurface work, work should cease in that area of the site and an environmental professional should be contacted to further discuss course of action as it relates to impacted soil management. Exposed soil should be covered with construction plastic then secured with clean soil. Work should not resume in potentially impacted areas of the site until appropriate soil characterization data is received and assessed. Monitoring might be required if impacted soil is encountered. It should be noted that if impacted soil is encountered, there is not a requirement to excavate and remove soil that is outside of the proposed excavation/grading dimensions.

Monitoring

If impacted soil is encountered, monitoring and permitting requirements will be evaluated, as needed. In the case that permitting and monitoring is required, it is recommended that an environmental professional be retained for permit management. An SCAQMD permit may be required to proceed with earth work, any and all permit requirements should be strictly adhered to, including the potential need to monitor vapor emissions with a PID or equivalent.

Waste Profiling

Soil characterization will be required if attempting to move potentially impacted soil off-site. Waste samples representative of the impacted area will be collected, analyzed, and submitted to a licensed

disposal facility. The number of soil samples and analytical program will be in accordance with the chosen disposal facilities waste acceptance criteria. Potential disposal facilities are listed in the Disposal section of this SMP. Once the waste is profiled, and acceptance is approved at the facility, the waste at the site will be directly loaded onto trucks for transport to the disposal facility. Waste disposal should occur within the project work activities, and not delayed for any reason. Soil temporarily stockpiled shall follow the methodology described in the Excavation, Segregation and Storage section of this SMP. If impacted soil is characterized as Resource Conservation and Recovery Act (RCRA) hazardous, or non-RCRA hazardous, a United States Environmental Protection Agency (USEPA) identification number (ID) will be required for disposal and will be either obtained or reactivated prior to shipment. Waste characterized as non-hazardous will not require a USEPA ID, however disposal at a licensed facility is still warranted as the presence of any impacts are not advisable for reuse in areas where sensitive receptors are within proximity.

Excavation/Grading Contractor

If impacted soil is characterized as hazardous a contractor with an active General A hazardous contractor's license with the State of California will be required to handle the impacted soil. Per OSHA regulations (Federal Standards –29 CFR, Part 1926 and CCR Title 8 Section 5192), if the soil is classified as a hazardous waste per the soil characterization, then the contractor's employees working on the site are required to be 40-hour trained in HAZWOPER. Proof of the required training for each of the onsite excavation contractor's employees will be required to be maintained onsite. Additionally, a site-specific health and safety plan (HASP), as required by federal law, must be developed prior to handling of impacted soils and adhered to during the duration of all soil handling activities.

Excavation, Segregation, and Soil Storage

In the case that impacted soil is encountered at the site, it should be arranged that an environmental professional shall be onsite during grading and excavation work conducted in the impacted areas. The environmental professional will direct the excavation contractor on the segregation of the impacted soil, which will either be stockpiled onsite or will be loaded directly onto trucks and covered and transported to an approved offsite disposal/recycling facility. If impacted soil is encountered in areas of the site that were not previously sampled then additional soil samples will be collected from the impacted soil for characterization, profiling, and disposal purposes.

If impacted soil is stored on site, it shall be stockpiled on polyethylene or placed in United States Department of Transportation (DOT) approved containers. Stockpiled material shall be stored on undamaged high-density polyethylene or equivalent impermeable barrier and be completely covered with the same material or equivalent impermeable barrier. The stockpile cover should be secured using sandbags or similar, and a berm shall be constructed around the stockpile to prevent run-off from exiting the soil staging area. The stockpile shall not be located in sensitive site areas or in areas containing inlets to storm drains and other water ways. Stockpile areas will not contain standing water at any time. Residual water resulting from excavated soil that is too wet to transport will be properly containerized, tested, and disposed.

The contractor will have spill containment equipment and devices on site at all times during the excavation work. Best management practices for site runoff will be implemented at all times during the work in accordance with Los Angeles County Department of Public Works (LACDPW) Stormwater

Pollution Prevention Plan (SWPPP) Preparation Manual dated August 2010 storm water management requirements.

Confirmation Soil Sampling

If impacted soil is identified and excavated, confirmation samples will be collected from the excavation area to verify that no residual impacted soil exists.

An environmental professional will collect soil samples from sloped excavation areas less than 5 feet in depth that are safe to access, by driving the soil sampler directly into the excavation sidewall and excavation bottom. The sidewall sample will be collected from the mid-point of the vertical or sub-vertical excavation walls. Potentially impacted soil observed in excavation sidewalls may be targeted for sample collection, if deemed appropriate. In excavation areas greater than 5 feet in depth, soil samples will be collected directly from the bucket of an excavator. The environmental professional will instruct the excavator operator where in the excavation to grab the desired soil sample, including bottom and sidewall samples. Sample frequency will be determined by the size and depth of the excavation, additionally the disposal facility might require a specified sample frequency as well.

The soil samples will be collected in appropriate sampling containers provided by the analytical laboratory. The container will be labeled, sealed with Teflon, and stored in a cooler chilled to 4 degrees Celsius. The environmental professional will coordinate with the analytical laboratory to have samples couriered to a State of California certified analytical laboratory under chain-of-custody (COC) protocol. For rush turnaround, the samples can be analyzed by a mobile onsite laboratory. Soil sample collection will be in conformance with the current revision of the USEPA, SW-846 guidance document *Test Methods for Evaluating Solid Waste*.

PID analysis of soil samples will be performed to screen the soil samples for VOCs. A plastic bag, brass ring, or acetate sleeve containing soil will be sealed and allowed to volatilize. The container will be agitated and then opened enough to allow the PID probe tip to be placed within one-eighth inch of the soil. At the start of each day of soil sample collection, the PID will be calibrated to an isobutylene standard. PID data will be recorded on the daily field sheets.

Observations made in the field will be recorded by the environmental professional. The field notes will include classification of the soil per the Unified Soil Classification System, a description of any discoloration or odors noted in the soil, and any detections measured by the PID. The sample locations will also be noted on maps or sketches of the excavation area. Copies of the COC will be retained by the environmental professional.

Following collection of samples, all sampling equipment will be decontaminated in a non-phosphate detergent soap solution and triple rinsed. Spent decontamination fluid should be stored in 55-gallon drums, corresponding soil sample data can be used to characterize the decontamination fluid so long as the disposal facility acceptance criteria is met. Soil sampling will be performed under the oversight of a California Professional Geologist.

Upon removal of stockpiled soil, a visual inspection of the visqueen base layer of the stockpile will be conducted to identify any rips, tears, or failures where stockpiled soil came into contact with native soil beneath the plastic base layer. If it appears the base layer has been breached, confirmation soil samples should be collected from below the entire stockpile at a rate of one sample per 200 square feet. These soil samples will be submitted to a laboratory under the same protocol as other confirmation samples.

Soil Sample Analysis

Soil samples will be transported to a State certified analytical laboratory under strict COC protocol. The laboratory analyses shall be performed by a laboratory certified by the California Department of Health Services Lab Accreditation Program for each of the analyses to be performed. The analytical laboratory Environmental Laboratory Accreditation Program (ELAP) number will be included in the analytical report. The soil samples will be analyzed for known constituents in the excavation area including one or more of the following analyses:

- Full range TPH by EPA Method 8015M
- VOCs by EPA Method 8260B
- CAM 17 metals by EPA Method 6010B/7471A

Soil samples will be collected to document contaminant concentrations at the final excavation extent. The analytical program used for the profiling of the soil shall be in accordance with the requirements of the disposal facility that will accept the excavated soil.

Total metals concentrations exceeding 10 times the Soluble Threshold Limit Concentration (STLC) will be analyzed for STLC and total metals concentrations exceeding 20 times the STCL will be analyzed by the Toxicity Characteristic Leaching Procedure (TCLP).

Sample analysis turnaround time will be such that it meets contract requirements and hold times.

Method Detection Limits

The analytical laboratory is required to report both the method detection limit (MDL) and the practical quantitation limit (PQL) for every sample result. Per 40 CFR, part 136, Appendix B, the MDL is defined as the minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero. The PQL is typically 2 to 10 times the MDL. A detection between the MDL and the PQL is flagged by the laboratory to indicate that the laboratory cannot reliably quantify the detection. Laboratories are required to report all detections and all data qualifiers. All non-detections will be reported as not detected less than the value of the MDL.

Transportation Requirements and Procedures

Requirements of Haulers

Qualified haulers to transport soil from the site will be retained. The selected haulers will be fully licensed and insured to transport the environmentally impacted soils. Haulers will follow all applicable requirements of the Department of Transportation (DOT) regulations contained in Code of Federal Regulations (CFR), Title 49 Parts 174 through 177 with regard to loading, unloading, and general handling based on transport mode. If the soil is classified as a hazardous waste, then the soil shall be transported by a hazardous waste hauler registered with the California EPA Department of Toxic Substances Control and excavation contractor employees assisting with loading of the trucks will be 40-hour trained in HAZWOPER. Proof of the required training for each of the onsite contractor's employees will be maintained at the site.

Truck Loading Operations

Trucks will be loaded at designated soil staging areas for transportation to the designated disposal facility. Stray waste material on vehicles, tires, or on the lips of the container, etc., will be removed manually with a brush; shaker plates may also be used to reduce tracking of the materials offsite. Prior to leaving the site, the container of the truck will be covered to prevent soil or dust from being released from the truck during transport to the disposal facility. Prior to leaving the soil staging areas, each truck will be inspected by environmental field personnel or the site supervisor to ensure that the containers are adequately covered and secured, the trucks are cleaned of overburdened soil, and the shipment is properly manifested. Each truck will receive the proper placarding and paperwork. Water spray or mist suppressant will be applied during soil loading operations to minimize fugitive dust, as appropriate.

Transportation Requirements

Transportation of non-hazardous waste or hazardous waste offsite will be in accordance with DOT regulations contained in CFR, Title 49 and the California Hazardous Waste Control Law (Health and Safety Code Section 25100 et seq.; California Code of Regulations (CCR), Title 22, Section 66428 et Seq.). Vehicle idling time within the staging areas will be kept to a minimum to limit air emissions.

All waste haulers will satisfy the following requirements:

- Vehicles will have passed an annual inspection.
- Vehicle operators will be trained in the safe handling of the waste/material.
- Haulers will maintain the ability to pay damages caused by their operations through proper insurance coverage.
- Haulers will have licenses issued by the California Highway Patrol (CHP) for transportation of hazardous materials.
- Haulers will take actions to ensure there are no waste discharges during transport (e.g., covering the load to prevent the discharge of dust/particulates into the atmosphere during hauling).

Hazardous waste haulers will satisfy the following additional requirements:

- Haulers will have a valid Department of Toxic Substances Control (DTSC) registration.
- Haulers will have an USEPA identification number.
- Haulers will comply with the Uniform Hazardous Waste Manifest System.

Transportation Routes

Transportation of waste will follow routes on arterial streets and freeways approved for truck traffic to minimize potential impacts on the local neighborhood. Transportation should be conducted in accordance with the National Hazardous Material Route Registry - US Department of Transportation DOT-Federal Motor Carrier Safety Administration (FMCSA) Hazardous Materials (HM) designated, preferred, or prescribed routes for transportation of hazardous materials in California. Truck routes will be determined once a disposal facility is selected, as necessary.

Traffic Control Procedures

Soil for offsite disposal will be transported in trucks from the designated soil staging areas. Prior to loading, all trucks will be staged to avoid impacts on the local streets. Traffic will be coordinated in

such a manner that, at any given time, a limited number of trucks will be at the site to reduce truck traffic on surrounding surface streets and to reduce dust generation during onsite transportation. While at the site, all trucks will be required to maintain slow speeds (e.g., less than 15-miles per hour) for safety purposes, and to minimize dust generation.

Disposal of Impacted Soil

Upon acceptance of the soil by the disposal facility, impacted soil will be loaded onto trucks, covered, and transported to the approved offsite disposal/recycling facility. Below is a list of disposal facilities within vicinity of the site:

The following are potential non-hazardous waste disposal facilities:

- Chiquita Canyon Landfill in Castaic, California- (661) 257-3655
- TRS in Azusa, California- (626) 969-1384
- Santa Maria Sanitary Landfill in Santa Maria, California- (805) 925-0951

The following are potential non-RCRA hazardous waste disposal facilities:

- US Ecology in Beatty, Nevada
- Clean Harbors in Buttonwillow, California

The following are potential RCRA hazardous waste disposal facilities:

- Clean Harbors – Aragonite, in Grantsville, Utah

It will be arranged that a representative of Jushi Holdings, Inc. will sign the waste manifests at his/her convenience and prior to the date of waste removal. A copy of the waste manifest will be included as an appendix to the report documenting the findings of the impacted soil excavation, removal, and disposal. Additionally, the generator's copy of the manifest shall be provided to Jushi Holdings, Inc. after shipment of the waste, but before the final report is released.

Shipment Documentation and Record Keeping

Shipment Documentation

The appropriate non-hazardous waste manifest or Uniform Hazardous Waste Manifest will be used to track the movement of waste soils from the point of generation to the disposal facility. Prior to transporting the excavated soil offsite, an authorized Jushi Holdings, Inc. representative will sign each waste manifest. Jushi Holdings, Inc. will maintain a copy of the waste manifest for each truckload onsite until completion of the project. At a minimum, the shipping documents will include the following information:

- Name, address, and phone number of waste generator
- Name, address, and phone number of waste hauler
- Name, address, and phone number of disposal facility
- Description of the waste
- Quantity of waste shipped
- For hazardous waste shipments, items such as the Method Management Code (MMC), Federal, California, source, and form codes will also be noted, as applicable.

Record Keeping

Waste transportation will comply with the California Vehicle Code (CVC), CHP Regulations (13 CCR), California State Fire Marshal Regulations (19 CCR), DOT Regulations, Title 49, Code of Federal Regulations (49 CFR), and the California Health and Safety Code (HSC) and 22 CCR. These requirements include the keeping of appropriate records during transportation activities. The contractor will be responsible for maintaining a record book during onsite activities. The record book will serve to document observations, personnel onsite, as well as truck arrival and departure times.

Reporting

Reporting shall be completed in accordance with acquired permit requirements. In the case a report is required, it shall include a summary of the excavation methodology, volumes and locations of impacted soil removed from the site, a detailed map depicting sample locations, tabulated analytical results and copies of waste manifests. The report shall be signed and stamped by a California Professional Geologist or a Professional Engineer.

Limitations

This SMP has been prepared for and is intended for the exclusive use of Jushi Holdings, Inc. The contents of this report should not be relied upon by any other party without the written consent of Rincon Consultants, Inc.

Our conclusions regarding the site are based on the results of limited subsurface sampling programs conducted by other parties. The results of these evaluations are qualified by the fact that only limited sampling and analytical testing was conducted during these assessments.

The concentrations of contaminants measured at any given location may not be representative of conditions at other locations. Further, conditions may change at any particular location as a function of time in response to natural conditions, chemical reactions, and other events. Conclusions regarding the condition of the site do not represent a warranty that all areas within the site are similar to those sampled.

References

Dibblee. 1991. Geologic Quadrangle of Beverly Hills and Santa Ana Quadrangles.

ETIC. 2020. Well Abandonment Report, Former Mobil Service Station 18FX5, 3800 Sepulveda Boulevard, Culver City, California 90230 RWQCB Case # I-0702, Charnock PRP Site No. 8. 29 July 2020.

Rincon Consultants, Inc. 2020 Phase I Environmental Site Assessment. October 29, 2020.

_____. 2021. Proposal to Prepare a Soil Management Plan for the Beyond/Hello Project at 3800 Sepulveda Boulevard in Culver City, California. November 23.

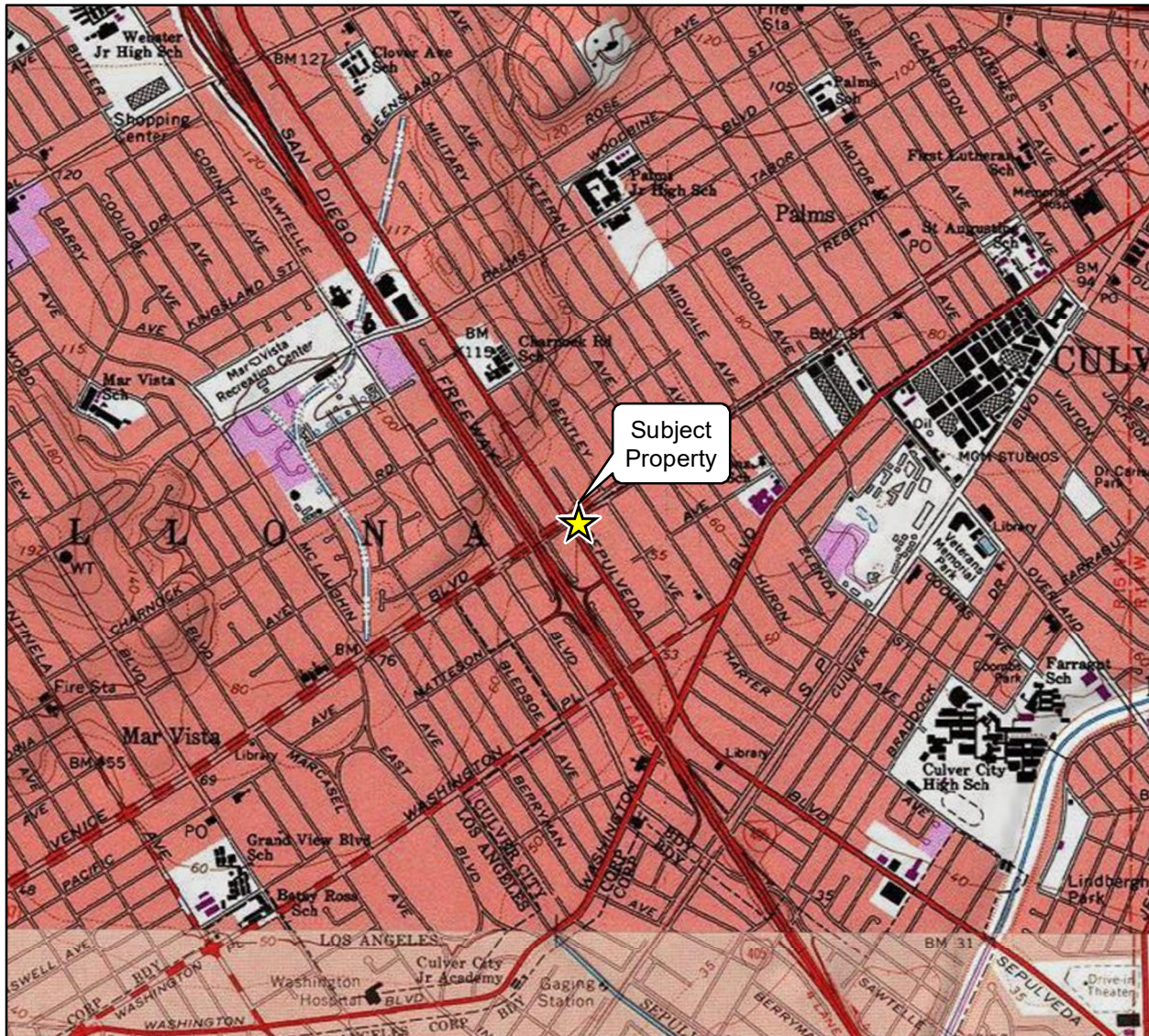
SWQCB. 2021. "Geotracker."
https://geotracker.waterboards.ca.gov/profile_report?global_id=T0603703268 (accessed December 2021).

URS Corporation (URS). 2004a. Confirmation Soil Sampling Report for Mobil Service Station #18-FX5, 3800 Sepulveda Boulevard, Culver City, California. November 19.

_____. 2004b. Soil Vapor Extraction Rebound Testing Report for Mobil Service Station #18-FX5, 3800 Sepulveda Boulevard, Culver City, California. February 26.

Figures

Figure 1 Vicinity Map



Imagery provided by National Geographic Society, Esri, and their licensors © 2020. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

0 1,000 2,000
Scale in Feet

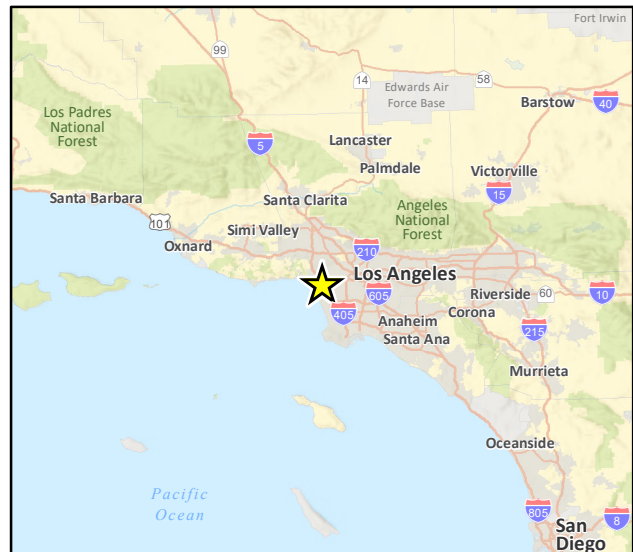


Figure 2 Site Map

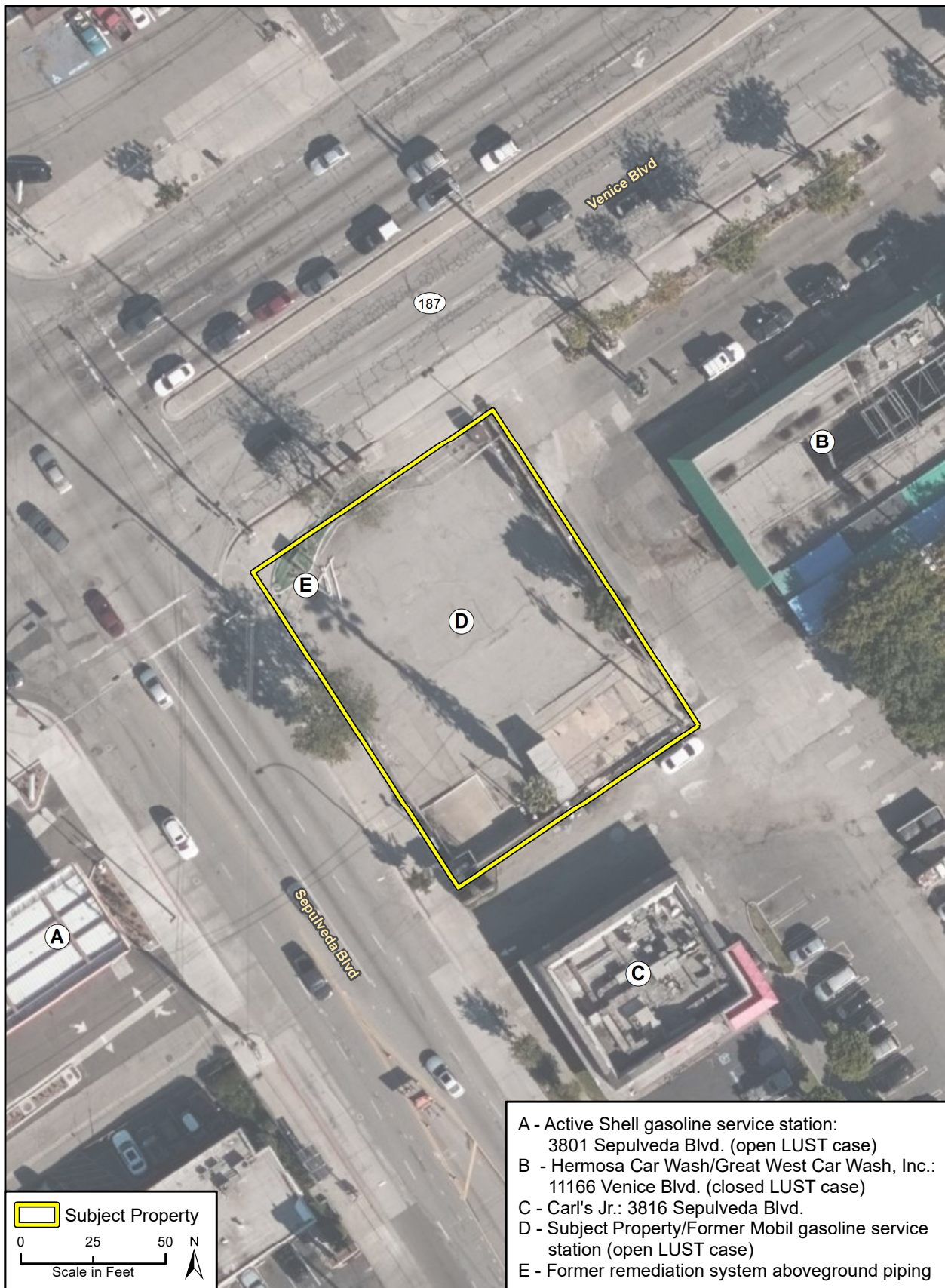
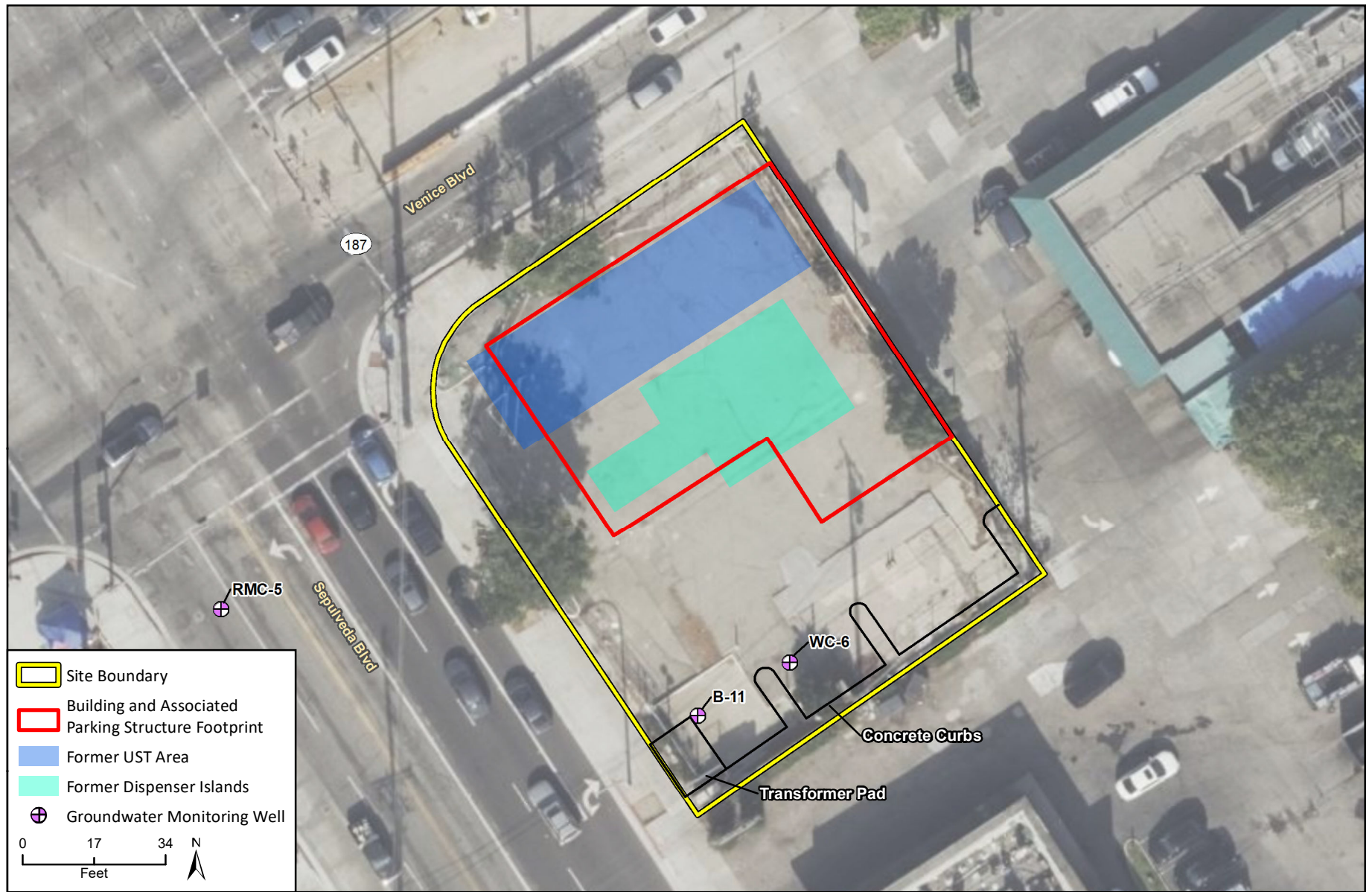


Figure 3 Proposed Building Footprint, Groundwater Monitoring Wells, and Historical Retail Facility Locations



Imagery provided by Microsoft Bing and its licensors © 2021. Additional data provided by AME Engineers and Earth Scientists, 2012.



Phase I Environmental Site Assessment

3800 Sepulveda Boulevard
Culver City, California

prepared for
Jushi Holdings, Inc.
Jushi, Inc.
PacVentures and/or its SPE
TGS CC Ventures, LLC
Pacific Oakmark TBird, LLC

prepared by
Rincon Consultants, Inc.

Revised December 21, 2020



RINCON CONSULTANTS, INC.

Environmental Scientists | Planners | Engineers

rinconconsultants.com



Rincon Consultants, Inc.

250 East 1st Street, Suite 1400
Los Angeles, California 90012

213 788 4842 OFFICE AND FAX

info@rinconconsultants.com
www.rinconconsultants.com

Revised December 21, 2020

Project 20-09551

Matt Leeth, Esq., EVP and Co-Head of Legal Affairs
Jushi Holdings, Inc.
1800 NW Corporate Blvd., Suite 200
Boca Raton, FL 33431
Via email: mleeth@jushico.com

**Subject: Phase I Environmental Site Assessment
3800 Sepulveda Boulevard
Culver City, California**

Dear Mr. Leeth:

This report presents the findings of a Phase I Environmental Site Assessment (ESA) completed by Rincon Consultants, Inc. for the property located at 3800 Sepulveda Boulevard in Culver City, California. The Phase I ESA was performed in accordance with our proposal and contract dated April 15, 2020.

The accompanying report presents our findings and provides an opinion regarding the presence of recognized environmental conditions in connection with the subject property. Our work program for this project, as referenced in our contract, is intended to meet the guidelines outlined in the American Society for Testing and Materials (ASTM), Standard Practice for Environmental Site Assessments: *Phase I Environmental Site Assessment Process* (ASTM Standard E1527-13). Our scope of services, pursuant to ASTM practice, did not include any inquiries with respect to asbestos, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, vapor intrusion or other indoor air quality, mold, or high-voltage power lines.

Thank you for selecting Rincon for this project. If you have any questions, or if we can be of any future assistance, please contact us.

Sincerely,

Rincon Consultants, Inc.

Meghan Hearne
Sr. Environmental Scientist

Walt Hamann, PG, CEG, CHG
Vice President, Environmental Services

Table of Contents

Executive Summary	1
Introduction.....	2
Purpose.....	4
Scope of Services	5
Significant Assumptions, Limitations, Deviations, Exceptions, Special Terms, and Conditions.....	6
User Reliance.....	6
Site Description	6
User-Provided Information	8
Records Review	14
Physical Setting Sources.....	14
Standard Environmental Record Sources.....	15
Additional Environmental Record Sources.....	25
Review of State of California Geologic Energy Management Division (CalGEM) Records	28
Review of National Pipeline Mapping System Records	28
Review of California Statewide PFAS Investigation	28
Known or Suspect Contaminated Release Sites with Potential Vapor Migration	29
Historical Use Information on the Property and the Adjoining Properties.....	30
Interviews	34
Interview with Owner	34
Interview with Site Manager.....	36
Interviews with Occupants	36
Interviews with Local Government Officials	36
Interviews with Others.....	37
Site Reconnaissance	38
Methodology and Limiting Conditions	38
Current Use of the Property and Adjacent Properties.....	38
Past Use of the Property and Adjacent Properties	38
Current or Past Uses in the Surrounding Areas.....	38
Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions	38
General Description of Structures	38
Roads	39
Potable Water Supply	39
Sewage Disposal System	39
Interior and/or Exterior Observations	39
Evaluation	41
Findings.....	41
Opinions.....	41
Conclusions.....	43
Recommendations	44



Deviations44

References45

Signatures of Environmental Professionals46

Qualifications of Environmental Consultants47

Tables

Table 1 Current Uses of Adjacent Properties.....7

Table 2 EDR Listing Summary of the Subject Property and Select Sites Within One-Eighth
Mile of the Subject Property18

Figures

Figure 1 Vicinity Map

Figure 2 Site Map

Figure 3 Adjacent Land Use Map

Figure 4 Site Photographs

Figure 5 Site Photographs

Appendices

Appendix A Interview Documentation

Appendix B Regulatory Records Search

Appendix C Historical Research Documentation

Appendix D Regulatory Documentation



Executive Summary

This report presents the findings of a Phase I Environmental Site Assessment (ESA) for the property located at 3800 Sepulveda Boulevard in Culver City, California (Figure 1, Vicinity Map). The Phase I ESA was performed for Jushi Holdings Inc., Jushi Inc., PacVentures and/or its SPE, TGS CC Ventures, LLC and Pacific Oakmark TBird, LLC by Rincon Consultants, Inc. (Rincon). Jushi Holdings has requested this assessment and will use the information for the purpose of evaluating the subject property for lease. The subject property is currently developed with an asphalt-paved vacant lot which was formerly occupied by an Exxon Mobil gasoline station.

Rincon performed a reconnaissance of the subject property on November 4, 2020. The purpose of the reconnaissance was to observe existing conditions and to obtain information indicating the presence of recognized environmental conditions (RECs) in connection with the subject property. Based on our site reconnaissance, the subject property appears to have historically been operating as a gasoline service station. The subject property is currently vacant. There are no structures onsite. One 55-gallon drum labeled “hazardous waste” was observed in the southern corner of the subject property. According to information provided by Exxon, the drum contains absorbent socks from offsite investigation near the Shell Station, and was reported to have been scheduled for removal from the subject property on Thursday, November 19, 2020.

A regulatory database search was conducted by Environmental Data Resources (EDR) for sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. The search was conducted for the subject property and included data from surrounding sites within a specified radius of the property. The subject property and adjacent properties were listed on various release and non-release databases, as well as the State Water Resource Control Board (SWRCB) online GeoTracker database.

The subject property was historically occupied by a former Mobil gasoline service station. Tanks and associated underground piping had been removed since at least 2005. The subject property is associated with an open Leaking Underground Storage Tank (LUST) case which is currently under verification monitoring. Remedial activities have been conducted, including soil vapor extraction and groundwater extraction. Current phase of the project is groundwater monitoring and sampling/post-remediation monitoring. A work plan to destroy select onsite wells and offsite wells which are no longer part of the groundwater monitoring network has recently been approved by the Los Angeles Regional Water Quality Control Board (RWQCB). However, in March 2020 the Water Board indicated that the project consultant cannot destroy onsite wells B-11, V-2, and WC-6, RMC-5, RMC-6, US-6, WC-4, and WC-5. A technical report detailing the results of the well destruction activities was submitted to the Water Board on 29 July 2020. Additionally, monitoring/LPH recovery continues at RMC-3. Continued monitoring of the site wells by Exxon Mobil is expected to progress the site to case closure.

Although multiple adjacent and nearby release cases were identified by GeoTracker and EDR, based on case status (closed versus open), recent groundwater gradients, and depth to groundwater (approximately 80 to 87 feet below ground surface [bgs]), it is unlikely that the site are affecting the subject property.

The subject property is located within the Charnock Well Field methyl ethyl butyl ether (MTBE) Investigation Area. MTBE was detected in wells supplying drinking water to the City of Santa Monica



(the Charnock Well Field) in 1995. Because Mobil operated at the subject property (which is approximately 2,500 feet southeast of the Charnock Well Field), Mobil was named a Potential responsible Party (PRP). Following the construction of a new treatment system, the well field was reactivated during the fourth quarter of 2010. Although Mobil was named a PRP, a settlement was made, and the former onsite Mobil service station and USTs have been removed since at least 2005.

EDR reported historical dry-cleaning facilities at the following nearby locations: 1) Junes Cleaners – 11127 Venice Boulevard Suite 6 (located approximately 300 feet to the north) and 2) The Cleaning Store/Venice Cleaning Store/Venice Cleaners – 11277 Venice Boulevard (located approximately 775 feet to the west). Both listings indicate that the facilities operated as dry cleaners and used perchloroethylene and other hazardous materials. Additionally, although the sites were not reported on release databases, there is the potential for an unauthorized release to have occurred. Based on the addresses reported for these facilities, there is a strong likelihood that these sites are the same facility. During the site reconnaissance, June's Cleaners was observed at 11127 Venice Boulevard and 11277 Venice Boulevard could not be located. Based on the distance and potentially upgradient/crossgradient location of the June's Cleaner site (at 11127 Venice Boulevard), if a release of perchloroethylene or other hazardous materials occurs, soil vapor impacts could extend beneath subject property.

Historical sources reviewed as part of the Phase I ESA include aerial photographs, topographic maps, and city directories. Based on our review of these documents, it appears that the subject property consisted of undeveloped land from 1894 to 1930, possibly occupied by an orchard in 1928 (agricultural land use) and occupied by two small structures from 1938 to 1948. By 1953, it appears that the subject property was occupied by one structure which may have been redeveloped in the 1990s. By 2002, the site appears to be vacant. City directories indicate that 3800 Sepulveda Boulevard was occupied by Burgess Service Station in 1954, Oscar Mannis Service Station in 1975, and Adus Mobil Service from 1985 to 2000.

This assessment has revealed evidence of two *Recognized Environmental Conditions* and one *Potential Recognized Environmental Condition* as follows:

Recognized Environmental Conditions/Potential Historical Recognized Environmental Conditions

1. Onsite open unauthorized release case under verification monitoring, pending closure
2. Location of subject property within the Charnock Well Field MTBE Investigation Area

Potential Recognized Environmental Condition

1. Nearby upgradient/crossgradient historical dry cleaner

Based on the current subject property case status, we recommend continued monitoring of the site wells by Exxon Mobil as determined by the LA RWQCB to move forward in achieving case closure. Once closure is obtained, Exxon Mobil should abandon all the wells, probes, etc. that exist onsite and offsite.

Residual impacts may exist beneath the subject property as a result of the former onsite Mobil gasoline service station operations, or as a result of the adjacent Shell release and former adjacent release cases. Additionally, there is an upgradient/crossgradient historical dry cleaner located approximately 300 feet north of the subject property. The facility is reported to have used perchloroethylene and other hazardous materials. However, it is our understanding that a Deed Restriction has been filed for the subject property which requires a vapor barrier be installed beneath any new onsite structures. We recommend that the proposed building be developed with a



robust vapor barrier system to include a properly designed vapor mitigation system. Therefore, the risk for vapor intrusion would be low.



Introduction

This report presents the findings of a Phase I Environmental Site Assessment (ESA) conducted for the property located at 3800 Sepulveda Boulevard in Culver City, California (Figure 1, Vicinity Map). The Phase I ESA was performed by Rincon Consultants, Inc. (Rincon) for Jushi Holdings (Client) in general conformance with American Society for Testing and Materials (ASTM) E1527-13, our proposal and our contract dated April 15, 2020. The following sections present our findings and provide our opinion as to the presence of recognized environmental conditions (RECs) on the subject property.

Purpose

Jushi Holdings, Inc. has requested this assessment and will use the information for the purpose of evaluating the subject property for lease. The purpose of this Phase I ESA was to determine if there are RECs on the subject property, taking into account commonly and reasonably ascertainable information and to qualify for Landowner Liability Protections under the Brownfields Amendments to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

A REC is defined pursuant to ASTM E1527-13 as,

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

A Controlled REC is defined pursuant to ASTM E1527-13 as,

“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 (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). A condition considered by the environmental professional to be a controlled recognized environmental condition shall be listed in the findings section of the Phase I Environmental Site Assessment report, and as a recognized environmental condition in the conclusions section of the Phase I Environmental Site Assessment report”.

A Historical REC is defined pursuant to ASTM E1527-13 as,

“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 regulatory authority, without subjecting the property to any required controls (for example, use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical recognized environmental condition, the environmental professional must determine whether the past release is a recognized environmental condition at the time the Phase I Environmental Site Assessment is conducted (for example, if there has been a change in the regulatory criteria). If the EP [Environmental Professional] considers the past release to be a



recognized environmental condition at the time the Phase I ESA is conducted, the condition shall be included in the conclusions section of the report as a recognized environmental condition”.

A *de minimis* condition is defined pursuant to ASTM E1527-13 as,

“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. Conditions determined to be *de minimis* conditions are not recognized environmental conditions nor controlled recognized environmental conditions”.

Scope of Services

The scope of services conducted during this study is outlined below:

- Performed a reconnaissance of the subject property to identify obvious indicators of the existence of hazardous materials.
- Observed adjacent or nearby properties from public thoroughfares in an attempt to see if such properties are likely to use, store, generate, or dispose of hazardous materials.
- Obtained and reviewed an environmental records database search to obtain information about the potential for hazardous materials to exist at the subject property or at properties located in the vicinity of the subject property.
- Reviewed files for the subject property and immediately adjacent properties as identified in the database report, as applicable.
- Reviewed the current United States Geological Survey (USGS) topographic map to obtain information about the subject property and regional topography and uses of the subject property and surrounding sites.
- Reviewed additional pertinent record sources (e.g., California Geologic Energy Management Division [CalGEM] records, online databases of hazardous substance release sites), as necessary, to identify the presence of RECs at the subject property.
- Reviewed the California State Water Resources Control Board (SWRCB) 2019 Statewide Per- and Polyfluoroalkyl Substances (PFAS) Investigation online Public Map Viewer regarding current PFAS orders at any facilities located in the vicinity of the subject property.
- Reviewed reasonably ascertainable historical resources (e.g., aerial photographs, topographic maps, fire insurance maps, city directories) to assess the historical land use of the subject property and adjacent properties.
- Provided a user interview questionnaire to a representative of the client, the user of the Phase I ESA.
- Provided a property owner interview questionnaire to the property owner or a designated subject property representative identified to Rincon by the client.
- Conducted interviews with other property representatives (e.g., key site manager, occupants), as applicable.
- Reviewed available client-provided information (e.g., previous environmental reports, title documentation).



Significant Assumptions, Limitations, Deviations, Exceptions, Special Terms, and Conditions

This work is intended to adhere to good commercial, customary, and generally accepted environmental investigation practices for similar investigations conducted at this time and in this geographic area. No guarantee or warranties, expressed or implied, are provided. The findings and opinions conveyed in this report are based on findings derived from a site reconnaissance, review of an environmental database report, specified regulatory records and historical sources, and comments made by interviewees. This report is not intended as a comprehensive site characterization and should not be construed as such. Standard data sources relied upon during the completion of Phase I ESAs may vary with regard to accuracy and completeness. Although Rincon believes the data sources are reasonably reliable, Rincon cannot and does not guarantee the authenticity or reliability of the data sources it has used. Additionally, pursuant to our contract, the data sources reviewed included only those that are practically reviewable without the need for extraordinary research.

Rincon has not found evidence that hazardous materials or petroleum products exist at the subject property at levels likely to warrant mitigation. Rincon does not under any circumstances warrant or guarantee that not finding evidence of hazardous materials or petroleum products means that hazardous materials or petroleum products do not exist on the subject property. Additional research, including surface or subsurface sampling and analysis, can reduce Client's risks, but no techniques commonly employed can eliminate these risks altogether.

In addition, pursuant to ASTM E1527-13 practice, our scope of services did not include any inquiries with respect to asbestos-containing building materials, biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, indoor air quality unrelated to release of hazardous substances or petroleum products into the environment, industrial hygiene, lead-based paint, lead in drinking water, mold, radon, regulatory compliance, wetlands, or high-voltage power lines.

User Reliance

The Client has requested this assessment and will use the information for the purpose of evaluating the subject property for lease. This Phase I ESA was prepared for use solely and exclusively by Jushi Holdings Inc., Jushi Inc., PacVentures and/or its SPE, TGS CC Ventures, LLC and Pacific Oakmark TBird, LLC. No other use or disclosure is intended or authorized by Rincon. Also, this report is issued with the understanding that it is to be used only in its entirety. It is intended for use only by the Client, and no other person or entity may rely upon the report without the express written consent of Rincon.

Site Description

Location

The subject property is a 0.85-acre parcel located east of Sepulveda Boulevard and south of Venice Boulevard in Culver City, California (Figure 2, Site Map). The property is identified as 3800 Sepulveda Boulevard and Assessor's Parcel Number (APN) 4213-018-014.



Subject Property and Vicinity General Characteristics

The subject property currently consists of an asphalt-paved, vacant lot.

The subject property is located in an area that is primarily composed of residential and commercial land uses. Properties in the vicinity of the subject property include gasoline stations, commercial businesses, single-family residences, and multi-family residences. The current adjacent land uses are described in Table 1 and depicted on Figure 3, Adjacent Land Use Map.

Table 1 Current Uses of Adjacent Properties

Area	Use
Northern Properties	Venice Boulevard followed by 11143 Venice Boulevard (7-Eleven)
Eastern Properties	11166 Venice Boulevard (Sine & Brite Hand Car Wash)
Southern Properties	3816 Sepulveda Boulevard (Carls Jr.)
Western Properties	Sepulveda Boulevard followed by 3801 Sepulveda Boulevard (Shell Gasoline Station) and 3817 Sepulveda Boulevard (Subway)

Descriptions of Structures, Roads, Other Improvements on the Subject Property

During the site reconnaissance, no structures or other improvements were observed on the subject property. A chain-link fence was noted around the perimeter of the subject property.

Access to the subject property is available from driveways along both Venice and Sepulveda Boulevards.

The following utility providers service the area:

- Electrical Service – Southern California Edison
- Natural Gas Service –Southern California Gas Company
- Water Service – Los Angeles Department of Water and Power
- Sewer Service – Culver City Sanitation
- Solid Waste Service – Culver City Sanitation

User-Provided Information

As described in ASTM E1527-13 Section 6, Jushi was interviewed for actual knowledge pertaining to the subject property to help identify RECs in connection with the subject property. Mr. Blake Brower, Director of National Retail Operations, completed the User Questionnaire as provided by ASTM Appendix X3 on April 26, 2020. A copy of the completed questionnaire is included as Appendix A.

Based on our review of the completed questionnaire, Mr. Brower indicated the following:

- The Phase I ESA is required/being performed for a property purchase.
- No considerations beyond the requirements of Practice E1527 are required.
- Jushi and PacVentures will rely on the report.
- Exxon Mobil is the current site owner.

Based on our review of the completed questionnaire, Mr. Brower did not review the following sources of information and is unaware of information regarding the following:

- Recorded land title records (or judicial records, where appropriate) that identify any environmental liens filed or recorded against the subject property
- Recorded land title records (or judicial records, where appropriate) that identify any activity and land use limitations (AULs), such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the subject property under federal, tribal, state or local law
- Title Report that identifies information pertaining to environmental cleanup liens or AULs for the subject property

Based on our review of the completed questionnaire, Mr. Brower is unaware of information regarding the following:

- Specialized knowledge or experience related to the subject property or nearby properties
- Reduction in value for the subject property relative to any known environmental issues
- Pending, threatened, or past litigation relevant to hazardous substances or petroleum products, in, on, or from the subject property
- Pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property
- Notice from any government entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products

Based on our review of the completed questionnaire, Mr. Brower is unaware of information regarding the following:

- Commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases; the site was occupied by an Exxon Mobil gasoline station
- Obvious indicators that point to the presence or likely presence of releases at the property; USTs were found to have been leaking onsite.



- Remediation processes included the removal of free product from the groundwater table in the 1990's, pumping and treating the groundwater in the early 2000's, and soil vapor extraction in the same time period.

The following environmental documents were provided by the Client or were readily available online through the SWRCB's GeoTracker database:

- **Closure Request, Former Mobil Service Station 18FX5, 3800 Sepulveda Boulevard, Culver City, California 90230, prepared by ETIC, dated September 15, 2015.** At the request of ExxonMobil Environmental Services Company, ETIC Engineering, Inc. (ETIC) prepared this Closure Request for the Former Mobil Service Station 18FX5 (subject property). The closure request was based on an evaluation of site conditions at the time, with respect to target cleanup goals and low-threat criteria. The cleanup goals for the chemicals of concern in groundwater at this site were indicated as the Maximum Contaminant Levels (MCLs) which were reported as:
 - 1 microgram per liter (µg/L) for benzene
 - 150 µg/L for toluene
 - 680 µg/L for ethylbenzene
 - 1,750 µg/L for total xylenes
 - 13 µg/L for methyl tertiary butyl ether (MTBE) with a 5 µg/L secondary aesthetic level that has been adopted for MTBE
 - The California Department of Health Services (DHS) action level of 12 µg/L was reported as the goal for tertiary butyl alcohol (TBA)

The closure request indicated the following:

- Source removal – The site has undergone active remediation: a total of 140.4 gallons of light non-aqueous phase liquid (LNAPL) were recovered, the soil vapor extraction (SVE) system removed 14,886 pounds (lbs) of gasoline range TPH (TPH-g), 305 lbs of MTBE, and 85 lbs of benzene, and hydraulic containment removed 54.6 million gallons of groundwater. “Confirmation boring soil sample analysis indicates residual adsorbed-phase concentrations attenuate with depth. Soil vapor rebound analysis indicates that the adsorbed phase mass in the vadose zone has been mitigated to the extent practicable.”
- Groundwater conditions – “The extent of dissolved-phase hydrocarbons, benzene, MTBE, and TBA has been adequately assessed. Benzene and MTBE concentrations have been below MCLs for at least 11 quarters with the exception of well US-8A. Based on discrete-depth, low-flow groundwater sampling performed at the site, it appears that residual concentrations in soil will not change dissolved-phase concentrations more than the range that has been observed over the last few years and dissolved-phase concentrations will continue to decrease over time. Based on the results from quarterly groundwater sampling events performed at the site, the dissolved-phase concentrations are stable. The lateral extents of detectable dissolved-phase benzene and MTBE are less than 100 feet in length.”
- “In December 2014, three soil confirmation borings were advanced to 110 feet bgs to vertically assess the current soil conditions near the former western dispenser island where historically elevated hydrocarbon concentrations were detected. TPH-g concentrations greater than 100 mg/kg were only detected in one soil sample collected below a depth of 85 feet bgs (2,600 mg/kg in CB2 at 102.5 feet bgs). Confirmation boring CB2 was advanced near US-8A and since dissolved-phase concentrations are generally low from US-8A and groundwater samples are collected from a dedicated low-flow pump set in the area where the highest residual soil concentrations were detected, current conditions likely represent



the highest concentrations at the site with the residual concentrations of petroleum hydrocarbons.”

- Estimated Time to Reach MCLs – ETIC reported that benzene will decline to the MCL at well US-8A in approximately 8 years and that “The center of the modeled benzene plume would travel a maximum distance of 320 feet downgradient from well US-8A and downgradient concentrations would be below the MCL of 1 µg/L in 40 years.” ETIC’s BIOSCREEN calculations indicated that TBA will decline to the DHS action level at well US-5 in approximately 9.5 years and that “The center of the modeled TBA plume would travel a maximum distance of 560 feet downgradient from US-5 and downgradient concentrations would be below the DHS action level of 12 µg/L in 44 years. Estimated travel distances are based on the recent (May 2015) hydraulic gradient measured at the site.”
- Risk to the Environment – ETIC indicated that risks to the environment are minimal, based on the urban setting; distance to sensitive receptors; depth to groundwater beneath the site; and historical soil, soil vapor, and groundwater data.

Based on the data summarized above, ETIC recommend the environmental case associated with the site be classified as requiring “no further action.” A copy of this report is included in Appendix D.

- **UST Case Closure Review Summary Form, Former Mobil Service Station 18FX5, 3800 Sepulveda Boulevard, Culver City, California GeoTracker Global ID: T0603703268, prepared by the Los Angeles RWQCB, dated December 30, 2016.** This document provided a brief summary of the release case/site and indicated that this case meets all the required criteria for case closure under the Low-Treat Closure Policy (LTCP). The document included the rationale for closure under the LTCP. Regarding the risk for vapor intrusion to indoor air, “The case meets Policy Criterion 2a by Scenario 2. The minimum distance between the concentrations in soil greater than 100 milligrams per kilogram (mg/kg) of TPH in soil, and all existing or potential buildings is greater than 30 feet, and the intervening soil contains less than 100 mg/kg of TPH.” Based on the available information for the site, residual hydrocarbons do not pose a significant risk to human health, safety, or the environment, and the case meets the requirements of the LTCP. Accordingly, the Los Angeles RWQCB recommended that the case be closed but allowing for a public notification period as required by the LTCP. A copy of this document is included in Appendix D.
- **Work Plan for Well Destruction, Former Mobil Service Station 18FX5, 3800 Sepulveda Boulevard, Culver City, California 90230 – LARWQCB Case# I-0702, PRP Site No. 8, prepared by ETIC on behalf of ExxonMobil, dated March 6, 2020.** A review of this work plan indicates that there are currently 12 groundwater monitoring wells and three soil vapor extraction wells (V-1 to V-3) located on the subject property. Ten of the 12 onsite monitoring wells are gauged and sampled quarterly (B-12, B-13, US-1 to US-4, US-7A/B, US-8A/B, WC-1, and WC-2) and that two wells (B-11 and WC-6) have not been sampled since 2004, when a reduction in sampling was approved. Wells determined to be within the footprint of the proposed new building are: B-13, US-4, US-7A/B, US-8A/B, WC-1, WC-2, and V-3. Wells near the building site or other planned features that will likely be impacted by construction and potentially by the building footing/foundation are: US-1, US-2, US-3, B-12, and V-1. Groundwater monitoring wells that will remain at the site following well destruction activities are RMC-3, RMC-7, and WC-3 (shallow zone) and US-5 (deeper zone, Upper Silverado). Each of these locations are depicted on the site maps included in this work plan, a copy of which is included in Appendix D.



- **MTBE Pollution Investigation of the Charnock Sub-Basin (File No. 96-042), Mobile No. 18-FX5 (Former 11-FX5), 3800 Sepulveda Boulevard, Culver City, Case No. I-07021) (Global ID No. T0603703268) (PRP Site No. 8), prepared by the Los Angeles RWQCB, dated March 12, 2020.**
This letter was issued by the RWQCB in response to the Well Destruction Work Plan (March 6, 2020). The Los Angeles Regional Board staff had the following comments regarding the proposed well destruction activities:
 - 1) Los Angeles Regional Board staff concur with the destruction of wells B-12, B-13, US-1, US-2, US-3, US-4, US-7A/B, US-8A/B, V-1, V-2, V-3, WC-1, and WC-2.
 - 2) Los Angeles Regional Board staff do not approve the destruction of wells B-11, RMC-5, RMC-6, US-6, WC-4, WC-5, and WC-6. These wells need to be maintained and monitored as required by the Los Angeles Regional Board.Per the letter, ExxonMobil is required to submit a technical report detailing the results of the well destruction activities to the Los Angeles Regional board by June 15, 2020.

- **Site Status and Groundwater Monitoring Report First Quarter 2020 (1 January 2020 through 31 March 2020), Former Mobil Service Station 18FX5, 3800 Sepulveda Boulevard, Culver City, California 90230 - CRWQCB-LAR Case # I-07021, prepared by ETIC, dated April 3, 2020.**
According to the most recent available groundwater monitoring report, the subject property is occupied by a former (currently vacant) Mobil gasoline service station (18FX5) and the UST system had been removed. Remedial activities had been conducted, including soil vapor extraction and groundwater extraction. Current phase of the project is groundwater monitoring and sampling/post-remediation monitoring. This report presents the results of groundwater monitoring activities performed during the First Quarter 2020, including depth to groundwater measurements, and groundwater sampling and analysis. Per the report, *"In the fall of 1995, MTBE was discovered in wells supplying drinking water to the City of Santa Monica (the Charnock well field), and by 13 June 1996, all of the supply wells at the Charnock well field were shut down. Following construction of a new treatment system, the well field was reactivated during the fourth quarter of 2010. In correspondence dated 19 June 1997, the California Regional Water Quality Control Board, Los Angeles (CRWQCB-LAR) and the United States Environmental Protection Agency (EPA), collectively referred to as the Agencies, required that potentially responsible parties investigate their sites. Because ExxonMobil operated the former retail station located approximately 2,500 feet southeast of the Charnock well field, ExxonMobil was named a potential responsible party."*

Additionally, according to the report, the subject property was almost sold on March 2, 2020. In order to accommodate the prospective buyer's site redevelopment plans, ETIC submitted a Work Plan for Well Destruction to the CRWQCB-LAR on March 6, 2020. As reported by ETIC, *"The Work Plan proposed to destroy onsite wells that are within the new building footprint, as well as B-11, V-2, and WC-6, and offsite wells RMC-5, RMC-6, US-6, WC-4, and WC-5, which were selected as they no longer are part of the groundwater monitoring network (B-11, RMC-5, RMC-6, WC-6), groundwater levels have been below the screen interval for at least three years (WC-4, WC-5, WC-6), or laboratory results have indicated low or no detections of petroleum hydrocarbons in groundwater samples (US-6). CRWQCB-LAR responded to ETIC's Work Plan for Well Destruction in a letter dated 12 March 2020 and stated that ETIC may continue with plans to destroy onsite wells that are within the new building footprint, but may not destroy onsite wells B-11, V-2, and WC-6, RMC-5, RMC-6, US-6, WC-4, and WC-5. A technical report detailing the results of the well destruction activities will be submitted to the CRWQCB-LAR by 15 June 2020."* A copy of this report is included in Appendix D.



Hydrocarbon recovery as reported in the April 2020 groundwater monitoring report was summarized as follows:

- LPH Recovery: 140.4 gallons of Liquid Phase Hydrocarbon (LPH) removed from onsite wells; 2 gallons via hand bailing RMC-3 (04/17); 0.108 gallons via skimmer RMC-3 (07/18 – 11/18); 1 gallon via vacuum truck RMC-3 (6/19)
- Vapor Recovery: 14,886 pounds of TPH (05/99 – 12/03)
- Groundwater Recovery: approximately 48,936,164 gallons from 01/00 to 09/04; 1.973 gallons via skimmer RMC-3 (07/18 – 11/18); 27 gallons via vacuum truck RMC-3 (6/19)
- Soil Removal: approximately 100 cubic yards of soil beneath the

Current maximum concentrations as reported in the April 2020 groundwater monitoring report was summarized as follows:

- Total petroleum hydrocarbons (TPH): 11,000 µg/L (RMC-3, 3 March 2020)
- Benzene: 1.5 µg/L (WC-1, 4 March 2020)
- MTBE: <1.0 to <5.0 µg/L (all wells, 2-3 March 2020)
- Tertiary butyl alcohol (TBA): 3.1 µg/L (B-12, 2 March 2020)

Historical maximum concentrations were reported as:

- TPH: 3,600,000 µg/L (B-10, 7 December 1995)
- Benzene: 6,080 µg/L (RMC-3, 18 June 1992)
- MTBE: 2,100 µg/L (B-11, 8 August 1997)
- TBA: 520 µg/L (RMC-5, 28 July 1998)

In addition, PacVentures was also interviewed for actual knowledge pertaining to the subject property to help identify RECs in connection with the subject property. Mr. Andrew Kaplan, Manager of Pacific Oakmark TBird, LLC, completed the User Questionnaire as provided by ASTM Appendix X3 on November 3, 2020. A copy of the completed questionnaire is included as Appendix A.

Based on our review of the completed questionnaire, Mr. Kaplan indicated the following:

- The Phase I ESA is required/being performed for to observe existing conditions and to obtain environmental information for the purpose of evaluation of the property.
- No considerations beyond the requirements of Practice E1527 are required.
- Pacific Oakmark TBird, LLC will rely on the report.
- PacVentures is the current site owner.

Based on our review of the completed questionnaire, Mr. Kaplan reviewed the following sources of information and is unaware of information regarding the following:

- Recorded land title records (or judicial records, where appropriate) that identify any environmental liens filed or recorded against the subject property
- Recorded land title records (or judicial records, where appropriate) that identify any activity and land use limitations (AULs), such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the subject property under federal, tribal, state or local law
- Title Report that identifies information pertaining to environmental cleanup liens or AULs for the subject property



Based on our review of the completed questionnaire, Mr. Brower is aware of information regarding the following through the GeoTracker online database for the property:

- Specialized knowledge or experience related to the subject property or nearby properties
- Pending, threatened, or past litigation relevant to hazardous substances or petroleum products, in, on, or from the subject property
- Pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property
 - City of Santa Monica Methyl Tert-Butyl Ether (MTBE) groundwater litigation
- Notice from any government entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products

Additionally, Mr. Kaplan indicated that the purchase price being paid for the subject property reasonably reflects the fair market value of the property, and he is not aware of a reduction in value for the subject property relative to any known environmental issues.



Records Review

Physical Setting Sources

Topography

The current USGS topographic map of the Beverly Hills Quadrangle (2018) indicates that the subject property is located at an elevation of about 60 feet above mean sea level with topography sloping down to the south. The adjacent topography consists of the Baldwin Hills located to the southeast.

Geology and Hydrogeology

According to the California Geological Survey (CGS), *California Geomorphic Provinces, Note 36*¹, the subject property is located within the Transverse Ranges Geomorphic Province. The Transverse Ranges are an east-west trending series of steep mountain ranges and valleys. The east-west structure of the Transverse Ranges is oblique to the normal northwest trend of coastal California, hence the name "Transverse." The province extends offshore to include San Miguel, Santa Rosa, and Santa Cruz islands. Its eastern extension, the San Bernardino Mountains, has been displaced to the south along the San Andreas Fault. Intense north-south compression is squeezing the Transverse Ranges. As a result, this is one of the most rapidly rising regions on earth. Great thicknesses of Cenozoic petroleum-rich sedimentary rocks have been folded and faulted, making this one of the important oil-producing areas in the United States.

Site Geology

According to the Geologic Map of the Beverly Hills and Van Nuys quadrangle (Dibblee, 1991), the subject property is underlain by alluvial gravel, sand and silt-clay, derived mostly from Santa Monica Mountains; includes gravel and sand of stream channels.

Regional Groundwater Occurrence and Quality

The subject property is located within the Coastal Plain of Los Angeles groundwater basin, Santa Monica subbasin.

The Santa Monica subbasin underlies the northwestern part of the Coastal Plain of Los Angeles groundwater basin. Holocene age alluvium forms much of the surficial deposits for the central part of the subbasin and fills the Ballona gap, an erosional channel cutting into and across the Inglewood fault.

During the preparation of this Phase I ESA, we reviewed the California SWRCB's online GeoTracker database to determine groundwater flow direction in the vicinity of the subject property. According to the *Site Status and Groundwater Monitoring Report First Quarter 2020, Former Mobil Service Station 18FX5, 3800 Sepulveda Boulevard, Culver City, California* (subject property) prepared by ETIC and dated April 2020, depth to groundwater in the shallow aquifer ranged from 80.88 feet to 87.02 feet below the top of casing and groundwater elevations ranged from -22.55 feet to -27.99 feet above mean sea level (MSL) with a gradient reported to the southwest.

¹ <https://www.conservation.ca.gov/cgs/Documents/CGS-Note-36.pdf>



Charnock Well Field

The subject property is located within the Charnock Well Field MTBE Investigation area. In 1996, the City of Santa Monica was forced to shut down one of its main well fields after discovering contamination in the form of gasoline additives MTBE, TBA, and other VOCs. The contaminants had leaked into the groundwater supply from USTs and product pipelines in the area surrounding the well field. The Charnock wells remained closed for more than 14 years, through years of legal negotiations between the city and the oil companies. Due to the closure, the city was forced to significantly increase its reliance on imported water. The Charnock well field site encompasses a 10-acre parcel located in the City of Los Angeles. The Charnock well field site is located approximately 3.5 miles east of Santa Monica Bay, 4 miles south of the Santa Monica Mountains, and approximately 450 feet west of Interstate 405. The well field covers an area of approximately 450,000 square feet (10 acres) and is bounded by Sawtelle Boulevard to the east, Westminster Avenue to the south, Butler Avenue to the west and the Westwood Flood Control Channel (Westwood Channel) to the north.

Following the settlement with the oil companies who were determined as responsible for the contamination, the city contracted with a firm to begin work on a plan to reinstate use of the well field through a new treatment facility that would remove contaminants from groundwater and produce drinking water at a lower cost than importing water. The new treatment system would be one of the first large-scale facilities to use a granular activated carbon (GAC) process to remove the gasoline additive from groundwater. Following the construction of a new treatment system, the well field was reactivated during the fourth quarter of 2010. In addition to the solutions to restore its groundwater supply, the City also assisted with measures to prevent future contamination. California legislation, sponsored by the City of Santa Monica, led to a statewide ban on the use of MTBE in gasoline under Senate Bill 521-MTBE Public Health and Environmental Protection Act of 1997. The ban went into effect in January 2004.

Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR) was contracted to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. The EDR search was conducted for the subject property and included data from surrounding sites within specified radii of the property. A copy of the EDR report, which specifies the ASTM E1527-13 search distance for each public list, is included as Appendix B. As shown on the attached EDR report, federal, state, and county lists were reviewed as part of the research effort. Please refer to Appendix B for a complete listing of sites reported by EDR and a description of the databases reviewed.

The Map Findings Summary, included in the EDR report, provides a summary of the databases searched, the number of reported facilities within the search radii, and whether the facility is located onsite or adjacent to the subject property. The following information is based on our review of the Map Findings Summary and the information contained in the EDR report.

Subject Property

The subject property was listed on the following databases:

- UST database as Mobil Oil Corp S/s #19-FX5 at 3800 Sepulveda Boulevard
- SWEEPS UST database as Mobil Oil at 3800 Sepulveda Boulevard



- HIST UST database as Mobil Oil at 3800 Sepulveda Boulevard
- CA FID UST database as Mobil Oil at 3800 Sepulveda Boulevard
- WDS database as Service Station #18-FX-5 at 3800 Sepulveda Boulevard
- FINDS database as Mobil SS#11-FX5 at 3800 Sepulveda Boulevard
- HWTS database as 1x Mobil Oil #11-FX5 at 3800 Sepulveda Boulevard
- FINDS database as ExxonMobil Oil Corp 11080 at 3800 Sepulveda Boulevard
- ECHO database as ExxonMobil Oil Corp 11080 at 3800 Sepulveda Boulevard
- RGA LUST database as Mobil #18-FX5 (Former 11-FX5) at 3800 Sepulveda Boulevard
- LUST database as Mobil #18-FX5 (Former 11-FX5) at 3800 Sepulveda Boulevard
- Cortese database as Mobil #18-FX5 (Former 11-FX5) at 3800 Sepulveda Boulevard
- CERS database as Mobil #18-FX5 (Former 11-FX5) at 3800 Sepulveda Boulevard
- ICIS database as Mobil Service Station #18-FX-5 at 3800 Sepulveda Boulevard
- RCRA NonGen/NLR database as ExxonMobil Oil Corp 11080 at 3800 Sepulveda Boulevard
- HAZNET database as 1x Mobil Oil Corp at 3800 Sepulveda Boulevard
- CIWQS database as Mobil SS#11-FX5 at 3800 Sepulveda Boulevard
- EDR Historical Auto Station database as Aldis Mobil Service at 3800 Sepulveda Boulevard
- ENF database as Mobil #18-FXS (Former 11) at 3800 Sepulveda Boulevard
- HIST CORTESE database as Mobil #18-FXS (Former 11) at 3800 Sepulveda Boulevard

Regulatory agency files reviewed for the subject property are discussed in the Additional Environmental Record Sources section of this report.

Offsite Properties

Offsite properties listed by EDR fall under two general categories of databases: those reporting unauthorized releases of hazardous substances (e.g., Leaking Underground Storage Tank [LUST], National Priority List [a.k.a. Superfund sites], and corrective action facilities), and databases of businesses permitted to use hazardous materials or generate hazardous wastes, for which an unauthorized release has not been reported to a regulatory agency.

Rincon reviewed the EDR Radius Map and select detailed listings to evaluate their potential to impact the subject property, based on the following factors:

- Reported distance of the facility from the subject property;
- The nature of the database on which the facility is listed, and/or whether the facility was listed on a database reporting unauthorized releases of hazardous materials, petroleum products, or hazardous wastes;
- Reported case type (e.g., soil only, failed underground storage tank [UST] test only);
- Reported substance released (e.g., chlorinated solvents, gasoline, metals);
- Reported regulatory agency status (e.g., case closed, “no further action”); and,
- Location of the facility with respect to the reported groundwater flow direction (discussed in the Geology and Hydrogeology section of this report)

Facilities/properties that were interpreted by Rincon to be of potential environmental concern to the subject property, based on one or more of the factors listed above, are summarized in Table 2.



In accordance with ASTM E1527-13, contamination migration pathways in soil, groundwater, and soil vapor were considered in our analysis of offsite properties of potential environmental concern.



Table 2 EDR Listing Summary of the Subject Property and Select Sites Within One-Eighth Mile of the Subject Property

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
Subject Property					
Mobil #18-FX5 (Former 11-FX5)/ Mobil Oil Corp S/s #19-FX5/Mobil Oil/Service Station #18-FX-5/Mobil SS#11-FX5/Adlis Mobil Service Station/Adli Abdelsayed/1x Mobil Oil #11-FX5/ExxonMobil Oil Corp 11080	A1-A22	3800 Sepulveda Boulevard	Subject Property	RGA LUST	The facility is listed as a Mobil #18-FX5 in the years 1993, 1994 through 1998, 2000 through 2012.
				LOS ANGELES CO. HMS	The status of the facility is closed, and the permit has been removed.
				FINDS/HWTS	Database reveals no pertinent information.
				WDS	The facility is active that has continuous or seasonal discharge. The primary waste is classified as influent or solid wastes that pose a significant threat to water quality because of their high concentrations.
				HAZNET	The facility disposed of hazardous waste in 1988, 1990, 1993, 1995, 1996, 1997, 1998, 1999, 2000, 2006, and 2017, including tank bottom waste, unspecified oil-containing waste, and contaminated soil from site clean-up.
				LUST	The status of the facility is “open – verification monitoring” as of 05/26/2004. A release of gasoline to groundwater occurred. Quarterly groundwater has been conducted since 2013 and a request for closure was requested in 2015.
				CORTESE/CERS	The facility is classified as a Leaking Underground Storage Tank (LUST) Cleanup site.
				ECHO	The facility is listed under the Resource Recovery and Conservation Act (RCRA). No violations have been identified.

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
				HIST UST	One UST was installed at the site in 1966 and three USTs were installed at the site in 1983.
				UST	Facility owns an underground storage tank (UST).
				RCRA NonGen/NLR	The facility is classified as a non-generator that does not presently generate hazardous waste.
				CIWQS/CERS	The facility is associated with an NPDES Wastewater and Stormwater permit.
				SWEEPS UST	Four USTs are located at facility: one 6,000-gallon leaded fuel, one 8,000-gallon unleaded fuel, one 10,000-gallon unleaded fuel, and one 300-gallon waste oil
				CA FID UST	The status of the facility is active.
				ICIS	The facility received an administrative violation.
				EDR Historical Auto	The facility is listed as a gasoline service station in the years 1985 through 1999.
				ENF/HIST CORTESE	Facility waste type is classified as contaminated groundwater at a gasoline service station.
Adjacent Properties					
Great West Car Wash, Inc./Hermosa Car Wash	A23, A24, A25, A26	11166 Venice Boulevard	Adjacent Property – East	HIST UST	Four USTs are associated with the facility: one 12,000-gallon unleaded fuel, one 4,000-gallon diesel, and two 4,000-gallon premium fuel
				SWEEPS UST	Four USTs are associated with the facility.
				LOS ANGELES Co. HMS	The facility is classified as closed and the permit status is removed.
				CERS	The facility is classified as a chemical storage facility. No violations have been reported.
				EDR Historical Auto Stations	Facility is listed as a carwash in the years 1976, 1977, and 1986 through 1994.

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
				LUST	The status of the facility is listed as "Case closed as of 1/24/2006". A release of gasoline to groundwater was reported in 1990. The release was excavated and treated. The case was then closed.
				CORTESE/ CERS/HIST CORTESE	The facility is classified as a LUST Cleanup Site.
				ENF	The facility is associated with 4 USTs
Shell #204-1944-0100/Tesoro (Shell) 6825/Tesoro Shell 68525/Abrahams Charles H/Equilon Enterprises DBA Shell Oil Products	A27, A38, A29, A30, A31, A32, A33, A34, A35	3801 Sepulveda Boulevard	Adjacent Property – West	EDR Historical Auto	Facility is listed as a gasoline service station in the years 1969 through 1974, 1992 through 1994, 1997 through 2003, and 2011 through 2012.
				HIST UST	Four USTs are associated with the site: one 12,000-gallon unleaded fuel, one 12,000-gallon regular fuel, one 12,000-gallon premium fuel, and one 12,000-gallon diesel fuel.
				RCRA NonGen-NLR	Facility is classified as a non-generator that does not presently generate hazardous waste.
				FINDS	Database reveals no pertinent information.
				CERS HAZ WASTE/CERS TANKS	The facility is classified as a hazardous waste generator and is associated with a UST.
				HAZNET	The facility disposed of various hazardous waste in 2009, 2010, 2011, 2012, and 2013, including
				LOS ANGELES CO. HMS	Status of the facility is closed.
				CERS	Facility is classified as a chemical storage facility. Various violations have been reported and the facility has since, returned to compliance.

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
				HWTS	Facility is classified as an other gasoline station.
				UST	UST is listed under the Los Angeles County Fire Department.
				RCRA-VSQG	Facility is classified as a very small quantity generator.
				HIST CORTESE/ Cortese	Database reveals no pertinent information.
				LUST	The status of the facility is “open – remediation”. Many site assessments, groundwater monitoring, and remediation has been conducted to date.
				SWEEPS UST/ CA FID UST	Five tanks are located at the facility. The status of the facility is classified as active.
Rosen Mercedes Service/Frio Automotive/Adams Complete Auto Repair/Maxx Transmission and Auto Repair/ Steaven Jones Automotive Facility/Autotech/K and K Car Clinic/ G T International	C40, C41, C42, C43, C44, C45, C46, C47, C48	3817 South Sepulveda Boulevard	Adjacent Property – West	EDR Historical Auto	Facility is listed as various automotive repair shops in the years 1977 through 1980, 1982, 1983, and 1985 through 2014.
				RCRA NonGen/ NLR	The facility is classified as a non-generator that does not presently generate hazardous waste.
				RCRA-SQG	The facility is classified as a small quantity generator of hazardous waste.
				FINDS	Database reveals no pertinent information.
				ECHO	Facility is listed under the RCRA. No violations have been reported.
				LUST	The status of the facility is “case closed as of 2014”. A release of benzene toluene ethylbenzene xylene (BTEX) to soil was reported in 2008. Site assessments were completed following the releases from a UST. The case was then closed.

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
				CERS HAZ WASTE	The facilities are classified as hazardous waste generators
				HAZNET	The facility disposed of unspecified oil-containing waste in 1997.
				CERS	The facility is classified as a chemical storage facility. Various violations have been reported and the facility has since, returned to compliance.
				HWTS	Facility is classified as a general automotive repair.
7-Eleven #18820	A36, A37	11143 Venice Boulevard	Adjacent Property – North	HAZMAT	Status of facility is classified as active.
				CERS	Facility is classified as a chemical storage facility. No violations have been reported.
				UST	Status of facility is classified as historical
Nearby Release Sites					
Chevron #9-0561/Chevron Stations	D49, D50, D51, D52, D53, D54,	3775 Sepulveda Boulevard	200 feet – West	ENF	A violation was reported at the facility is 2000 for an overdue Remedial Action Plan (RAP).
				HIST CORTESE	The facility is listed as former Unocal and Chevron #9-0561.
				RCRA NonGen/NLR	The facility is classified as a non-generator that does not presently generate hazardous waste. No violations have been reported.
				HAZNET	The facility disposed of various hazardous waste in 2004, 2005, 2006, 2008, 2009, and 2010, including oil/water separation sludge and waste oil and mixed oil.
				HAZMAT	The status of the facility is inactive.
				HWTS	The facility is listed as an “other gasoline station.”
				HIST UST	The facility is associated with four USTs: one 9,000-gallon product fuel, one 7,500-gallon

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
					product fuel, one 3,000-gallon product fuel, and one 550-gallon waste oil.
				LUST	The status of the facility is “completed – case closed as of 09/2011”. A release of gasoline to groundwater was reported at the facility in 1996. Site assessments, groundwater monitoring, and remediation have been conducted at the site.
				SWEEPS UST/CA FID UST	The facility is listed as active with four USTs.
				CERS/CORTESE	The facility is classified as a LUST cleanup site.
				UST	The status of the facility is listed as inactive.
				EDR Historical Auto	The facility is listed as a gasoline service station in the years 1969 through 1975 and 1986 through 2009.
AM PM Special Delivery's/AM PM Special Delivery Service, Inc.	D60, D61, D62	11223 Venice Boulevard	350 feet – West	LUST	The status of the facility is listed as “completed – case closed as of 09/2010”. A release of gasoline to groundwater was reported in 1993. Site assessments, groundwater monitoring, and remediation was conducted. The case was then closed.
				ENF/HIST CORTESE	A notice of violation was reported at the facility for overdue site history.
				WDR	The status of the facility is historical.
				CIWQS	The facility is listed as a groundwater cleanup site.
				HAZMAT	The status of the facility is listed as inactive.
				SWEEPS UST/CA FID	The facility is listed as a LUST cleanup site.

Site Name	EDR Site ID	Site Address	Distance from Subject Property	Database Reference	Comments
				UST/CERS/ CORTESE	
Notable Sites					
Junes Cleaners	B38	11127 Venice Boulevard Suite 6	300 feet - North	EDR Historic Cleaners	The facility is listed as a dry-cleaning plant except rugs in the years 1991 through 2014.
The Cleaning Store/Venice Cleaning Store/Venice Cleaners	F76, F77, F80, F81, F82	11277 Venice Boulevard	775 feet - West	DRYCLEANERS	The facility is associated with dry cleaning equipment perchloroethylene.
				HAZNET/HWTS	Facility disposed of various hazardous waste in 1996, 1997, 1998, 1999, 2002, 2003, 2004, 2005, and 2006, including halogenated solvents.
				ECHO	Facility is registered with RCRA. No violations have been identified.
				RCRA NonGen/ NLR	The facility is classified as a non-generator that does not presently generate hazardous waste.
				RCRA-SQG	The facility is classified as a small quantity generator of hazardous waste.
				FINDS	Database reveals no pertinent information.
				CERS HAZ WASTE/CERS	Facility is classified as a hazardous waste generator and a chemical storage facility. Various violations have been reported and facility has since, returned to compliance.

***Bold** listings indicate a release database

Regulatory agency information reviewed for the listings in the table above are summarized in the Additional Environmental Record Sources section of this report.

Orphan Listings

No orphan or unmapped site listings were reported by EDR.

Additional Environmental Record Sources

Review of Agency Files

As a follow-up to the database search, Rincon reviewed regulatory information for the subject property and facilities within the specified search radii that were interpreted to have the potential to impact the subject property, based on one or more factors previously discussed (e.g., distance, open case status, upgradient location, soil vapor migration).

The following is a summary of our review of regulatory information obtained from review of online sources (e.g., SWRCB GeoTracker database, Department of Toxic Substances Control [DTSC] EnviroStor database) and/or files requested from the applicable regulatory agency, as described below. Copies of selected documents reviewed are included in Appendix D.

Subject Property

The subject property was listed in various databases searched by EDR, as well the SWRCB's online GeoTracker database. A summary of the LUST listings and other recent environmental documents pertaining to the subject property has been provided in the User-Provided information section of this report. The EDR city directory listings also indicate that the subject property was occupied by the following historical auto facilities:

- **Burgess Service Station:** 1954
- **Oscar Mannis Service Station:** 1975
- **Adus Mobil Service:** 1985 to 2000

Charnock Well Field – The subject property is located within the mapped boundaries of the Charnock Well Field. MTBE was detected in the City of Santa Monica's Charnock Well Field water supply wells 1995. In correspondence dated June 19, 1997 the Los Angeles Region RWQCB and the US EPA required that potentially responsible parties (PRPs) investigate their sites. Because Mobil operated at the subject property (which is approximately 2,500 feet southeast of the Charnock Well Field), Mobil was named a PRP. Following the construction of a new treatment system, the well field was reactivated during the fourth quarter of 2010. Although Mobil was named a PRP, a settlement was made, and the former onsite Mobil service station and USTs have been removed since at least 2005.

Adjacent Properties

Four adjacent properties were listed in databases searched by EDR. Three of the properties were listed on the LUST release database:

- **Great West Car Wash, Inc. at 11166 Venice Boulevard.** This property is located adjacent to the east of the subject property. According to the EDR report and GeoTracker, the facility is associated with a former gasoline service station and the site is associated with a release of gasoline to groundwater. Case cleanup status is reported as "Completed – case closed as of 1/24/2006." Per the *Site Assessment Report*, four 4,000-gallon USTs were installed at the site in



1957. Gasoline was last stored at the site in 1988. The four USTs were removed in 1989 and contamination was discovered. Soil samples collected indicated Total Petroleum Hydrocarbons (TPH)-gasoline, ethylbenzene, toluene, and xylenes were present at the site. The site was over excavated, and the soil was stockpiled onsite for future remediation. Deeper samples collected during a site investigation in 1994 indicate low detections of TPH and Benzene Toluene Ethylbenzene Xylene (BTEX) in soil. Site assessment included the collection of groundwater samples which historically contained detectable concentrations of TPH and BTEX. Groundwater monitoring wells were installed, and groundwater monitoring was conducted until 2005. The closest monitoring well to the subject property was reported as MW-14, which is located adjacent to the south of the subject property. Detectable concentrations of TPH-g and BTEX were reported in groundwater samples collected from this well as part of the Third Quarter 2005 monitoring event. According to the Third Quarter 2005 Groundwater Monitoring Report for the site (dated October 28, 2005), depth to groundwater was reported as 41 to 43 feet and the gradient was reported as to the north. The case was closed in 2006 due to low detections of TPH-g and BTEX in groundwater. A copy of the Third Quarter Groundwater Monitoring report is included in Appendix D. A copy of the case closure letter/closure summary was not available online through GeoTracker. Therefore, Rincon submitted a request for information to the Los Angeles County caseworker on April 21, 2020.

- **Shell #204-1944-0100 at 3801 Sepulveda Boulevard.** This property is located adjacent to the west of the subject property, across Sepulveda Boulevard. According to the EDR report and GeoTracker, cleanup status is reported as “Open - remediation as of 4/30/2008” and the facility currently remains under remediation and site assessment. Per the *Request of Shutdown of Tuller Avenue Treatment System*, the site was identified in 1996 as a potential source of MTBE to drinking water and a contributor to the regional impacts associated with the Charnock Well Field MTBE Investigation Area. A site assessment was conducted at the property in 1997 to determine the cause of the contamination. Groundwater monitoring wells and soil vapor extraction wells were installed in 1997 through 2003. The facility enrolled in a National Pollutant Discharge Elimination System (NPDES) permit in 1998. Pumped groundwater was treated using Granular Activated Carbon (GAC). Various site assessments and NPDES permits have been issued to the site, and multiple types of remediation remedies have been implemented. According to the *Quarterly Status Report Fourth Quarter (October through December) 2019 for the Charnock PRP (potentially responsible party) Site 11, Shell Service Station* (dated January 15, 2020), the groundwater elevation map for the shallow aquifer indicated a gradient to the west (in the vicinity of the subject property). The groundwater elevation contour map for the Upper Silverado Aquifer indicated a gradient to the north (in the vicinity of the subject property). Due to the current open case status and the proximity of the site to the subject property, it is possible that impacts could extend to groundwater beneath the subject property. However, the most recently reported groundwater gradients are reported as away from the subject property. A copy of the most recent January 2020 groundwater monitoring report is included in Appendix D.
- **G T International/Steaven Jones Automotive Facility at 3817 Sepulveda Boulevard.** This property is located adjacent to the west of the subject property, across Sepulveda Boulevard. According to the EDR report and GeoTracker, the site is associated with a former unauthorized release case reported as “Completed – case closed as of 10/27/2014.” Contamination was documented onsite when one 550-gallon waste oil UST was removed in 2008. Per the *Closure Summary*, approximately 30 tons of impacted soil was excavated in the vicinity of the former tank in the western portion of the site. However, the soil samples collected at two and six feet



below the removed UST were non-detect for all analytes. Therefore, groundwater was not sampled. The site was closed under low threat closure criteria in 2014. A copy of the closure letter is included in Appendix D. Based on the location of the former UST at the site, the soils only nature of the case, and the downgradient location with regard to groundwater flow (away from the subject property) the adjacent former release site is not expected to impact the subject property.

Nearby Release Sites

The following nearby release sites with potential to impact the subject property were reported by EDR:

- **Chevron #9-0561 at 3775 Sepulveda Boulevard (approximately 200 feet to the west):** According to the EDR report and GeoTracker, a release of gasoline to groundwater was reported in 1996 and cleanup status is reported as “Completed – case closed as of 9/19/2011.” The site is reported as being mapped within the City of Santa Monica Charnock Wellfield MTBE Investigation Area. Various groundwater monitoring wells and soil vapor extraction wells were installed at the site in the years 1997 through 2002. Approximately 27 tons of soil were excavated and removed from the site. Groundwater monitoring has been conducted. One 1,000-gallon waste oil UST and three 10,000-gallon gasoline USTs were removed from the site in 2009 and 2010, respectively. Confirmation soil samples collected following the removal of the tanks indicated the contamination had been delineated. The latest groundwater monitoring report indicates there are residual impacts in groundwater. Due to the proximity of the site to the Charnock Well Field investigation area, more stringent standards were applied in evaluating the site for long term control plans (LTCPs). However, human health pathways were evaluated and since the source of contamination had been removed and the extent of impacts defined, the case was closed in 2011 under the LTCP. A copy of the case closure summary and closure letter are included in Appendix D. Based on the closed case status and downgradient location of the site with regard to groundwater flow (away from the subject property), the former release is not expected to impact the subject property.
- **AM PM Special Delivery Service, Inc. at 11223 Venice Boulevard (approximately 350 feet to the west):** According to the EDR report and GeoTracker, a release of gasoline was reported to groundwater in 1993 and cleanup status is reported as “Completed – case closed as of 9/7/2010.” The site is reported as being mapped within the City of Santa Monica Charnock Wellfield MTBE Investigation Area. According to the LTCP review form, one 3,000-gallon gasoline UST was removed from the site in November 1993. Soil samples collected during tank removal contained detectable concentrations of TPH-g at a maximum concentration of 10,500 mg/kg. Ten groundwater monitoring wells were installed at the site between January and April 2001. Quarterly groundwater monitoring has been conducted from 2001 through 2010. To delineate onsite soil impacts, various site assessment subsurface investigations have been conducted in the years 1994 through 2010. In April 2009, site remediation consisted of in-situ chemical oxidation and 12 injection points were installed onsite. Approximately 12,000 gallons of sodium persulfate were injected at the site. Factors supporting low risk closure included source abatement and UST removal, delineation of impacts, in-situ chemical oxidation, maximum detectable concentrations onsite at the time of closure, and lack of free product detected at the site. A copy of the LTCP and closure letter are included in Appendix D. Based on the closed case status and downgradient location of the site with regard to groundwater flow (away from the subject property), the former release is not expected to impact the subject property.



Notable Sites

As indicated in Table 2, historical cleaner sites were reported in the vicinity of the subject property as follows:

- **Junes Cleaners – 11127 Venice Boulevard Suite 6** (located approximately 300 feet to the north of the subject property)
- **The Cleaning Store/Venice Cleaning Store/Venice Cleaners – 11277 Venice Boulevard** (located approximately 775 feet to the west of the subject property)

Based on the information available for these sites, it appears that both facilities were occupied by dry cleaners and operated by using perchloroethylene and other hazardous materials, including halogenated solvents. Although the facilities were not listed on a release database, there is the potential for an unreported release of hazardous materials to have occurred. Furthermore, the addresses of these two facilities are very similar and appear to be the result of an error in the EDR report.

Review of State of California Geologic Energy Management Division (CalGEM) Records

A review of the State of California Geologic Energy Management Division (CalGEM) Online Mapping System² indicates that no oil wells are located on the subject property or adjacent properties, or within one-quarter mile of the subject property.

Furthermore, according to the Los Angeles County Department of Public Works Solid Waste Information Management System³, the subject property is not located within 300 feet of an oil or gas well, or within 1,000 feet of a methane-producing site.

Review of National Pipeline Mapping System Records

A review of the National Pipeline Mapping System (NPMS) online Public Map Viewer⁴ indicates that no gas transmission pipelines are located on the subject property or adjacent properties. Three hazardous liquid pipelines run adjacent to the subject property. A Chevron-operated gasoline pipeline (Line 2731) actively runs along Venice Boulevard. A Crimson-operated crude oil pipeline (Line 32103) actively runs along Venice Boulevard. A Torrance Valley Pipeline Company-operated crude oil pipeline (Line 39534) actively runs along Sepulveda Boulevard.

Review of California Statewide PFAS Investigation

In 2019, the California SWRCB sent assessment requirements to property owners of sites that may be potential sources of PFAS. These sites currently include select landfills, airports, and chrome plating facilities. According to the SWRCB, “PFAS are a large group of human-made substances that do not occur naturally in the environment and are resistant to heat, water, and oil” (SWRCB 2019).

² <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>

³ <https://dpw.lacounty.gov/epd/swims/OnlineServices/search-methane-hazards-esri.aspx>

⁴ <https://www.npms.phmsa.dot.gov/PublicViewer/>



Our April 21, 2020 review of the California 2019 Statewide PFAS Investigation online Public Map Viewer⁵ indicates that there are no current chrome plating, airport, or landfill PFAS orders at any facilities located within one-half mile of the subject property.

Our April 21, 2020 review of the California 2019 Statewide Drinking Water System Quarterly Testing Results online Public Map Viewer indicates that PFAS were not detected in Santa Monica City Water Division drinking water wells located 600 feet to the north of the subject property.

Known or Suspect Contaminated Release Sites with Potential Vapor Migration

The EDR report was reviewed to identify nearby known or suspect contaminated sites that have the potential for contaminated vapor originating from the nearby site to be migrating beneath the subject property. Based on the ASTM E2600-15, *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*, the following minimum search distances were initially used to determine if contaminated soil vapors from a nearby known or suspect contaminated site have the potential to be migrating beneath the subject property:

- 1/10 mile (528 feet) for petroleum hydrocarbons
- 1/3 mile (1,760 feet) for other contaminants of concern (COCs)

If known or suspect contaminated sites are located within the above referenced distances from the subject property, online resources are reviewed to determine the extent of the contaminated plume at those sites. The following describes search distances for contaminated plumes of petroleum hydrocarbons (30 feet from the subject property) and other COCs (100 feet from the subject property). Per ASTM E2600-15, vapors associated with impacted soil or groundwater present within these distances have the potential to migrate beneath the subject property.

Petroleum Hydrocarbons

Based on our review of the EDR report, information provided by the Client, and information available through the SWRCB's GeoTracker online database, the subject property was formerly occupied by a Mobile gasoline service station and is associated with a release case with a cleanup status reported as "Open – Verification Monitoring as of 5/26/2004." Current phase of the project is groundwater monitoring and sampling/post-remediation monitoring. Request for closure was submitted by ETIC in September 2015. The closure request indicated that the source of impacts had been removed, that the site has undergone extensive active remediation, that confirmation boring soil sample analysis indicates residual concentrations attenuate with depth, and that soil vapor rebound analysis indicates that the adsorbed phase mass in the vadose zone has been mitigated to the extent practicable. Additionally, it is reported that the extent of dissolved-phase hydrocarbons, benzene, MTBE, and TBA have been adequately assessed in groundwater. Current maximum concentrations as reported in the April 2020 groundwater monitoring report were summarized as follows:

- Total petroleum hydrocarbons (TPH): 11,000 µg/L (RMC-3, 3 March 2020)
- Benzene: 1.5 µg/L (WC-1, 4 March 2020)
- MTBE: <1.0 to <5.0 µg/L (all wells, 2-3 March 2020)

⁵ <https://www.waterboards.ca.gov/pfas/>



- Tertiary butyl alcohol (TBA): 3.1 J µg/L (B-12, 2 March 2020)

In addition, based on the EDR report and GeoTracker, there are two adjacent closed release sites, and one adjacent open release site (Shell#204 – 3801 Sepulveda Boulevard). Although it is possible that the nearby release sites could impact groundwater and/or soil vapor beneath the subject property, it is our understanding that there is a Deed Restriction filed for the subject property which requires the installation of a vapor barrier. Therefore, the risk for vapor intrusion as a result of residual onsite impacts or the offsite migration of residual TPH/VOC impacts is considered low.

Note - As reported in the groundwater section of this report, the subject property is located within the Charnock Well Field MTBE Investigation area. In 1996, the City of Santa Monica was forced to shut down one of its main well fields after discovering contamination in the form of gasoline additives MTBE, TBA, and other VOCs. The contaminants had leaked into the groundwater supply from USTs and product pipelines in the area surrounding the well field. The Area has since been defined and the groundwater treated with GAC to remove the gasoline additives.

Other COCs

Based on our review of the EDR report, there are two historical cleaners were reported in the vicinity of the subject property as follows:

- Junes Cleaners – 11127 Venice Boulevard Suite 6 (located approximately 300 feet to the north)
- The Cleaning Store/Venice Cleaning Store/Venice Cleaners – 11277 Venice Boulevard (located approximately 775 feet to the west)

Both listings indicate that the facilities operated as dry cleaners and used perchloroethylene and other hazardous materials as part of routine operations. Additionally, although the sites were not reported on release databases, there is the potential for an unauthorized release to have occurred. Based on the addresses reported for these facilities, there is a strong likelihood that these sites are the same facility. Based on the distance and potentially upgradient location of the June's Cleaner site, if a release of perchloroethylene or other hazardous materials occurs, soil vapor impacts could extend beneath subject property.

Based on our review of the EDR report, there are no known or suspect sites contaminated with other COCs within 1,760 feet of the subject property. Therefore, per ASTM E2600-15, as this distance exceeds the 100-foot distance considered the critical distance wherein such migration may pose a threat to the subject property, there are no potential threats to the subject property posed by the potential migration of other COC vapors from listed sites.

Historical Use Information on the Property and the Adjoining Properties

The historical records review completed for this Phase I ESA includes aerial photographs, topographic maps, fire insurance maps, city directories, and building permits as detailed in the following sections. Copies of the historical resources reviewed are included in Appendix C. Table 3 provides a summary of the historical use information available for the subject property.



Review of Aerial Photographs

Aerial photographs from EDR's aerial photograph collection were obtained. In addition, a current aerial from Google Earth was reviewed. The aerial photographs were reviewed on April 17, 2020.

Review of Historical Topographic Maps

Historical topographic maps from EDR's map collection were obtained. The historical topographic maps were reviewed on April 17, 2020.

Review of City Directory Listings

EDR was contracted to provide copies of city directory listings for the subject property. The city directory listings were reviewed on April 17, 2020.

Review of Fire Insurance Maps

As indicated in the attached report, fire insurance maps were not available for the subject property or adjacent properties.

Review of Culver City Building Permit Records

Based on the sufficient amount of information obtained from the above sources, building permit records were not reviewed.

Other Historical Sources

Based on the historical information obtained, no additional historical sources were reviewed.

Summary of Historical Uses

Subject Property

Based on our review of the documents listed above, it appears that the subject property was developed with the following:

- 1894 to 1930 (Topographic Map [TM]): Undeveloped land
- 1928 (Aerial Photograph [AP]): the site appears to be an orchard
- 1938 to 1948 (AP): Two small structures are developed
- 1953 (AP): The site appears to be occupied by one main structure
- 1967, 1977, 1979, 1983, 1989 (AP): The site appears to have been redeveloped as a gasoline service station with two canopies and a retail structure
- 1950 to 1995 (TM): The area is shaded pink, indicating a developed area
- 1994, 2002 (AP): The subject property appears to have been redeveloped but appears to continue to operate as a gasoline service station
- 2005 (AP): The retail structure appears to remain onsite, but the subject property does not appear to be in operation
- 2002 to 2016 (AP): One commercial structure (existing building)



City directories provided for the subject property indicate that 3800 Sepulveda Boulevard was occupied by the following:

- **Burgess Service Station:** 1954
- **Oscar Mannis Service Station:** 1975
- **Adus Mobile Service:** 1985 to 2000

Northern Adjacent Properties (11143 Venice Boulevard)

Based on our review of the documents listed above, it appears that the northern adjacent properties were developed with the following:

- 1894 to 1920 (TM): Undeveloped land
- 1928 to 1934 (AP): multiple agricultural structures
- 1938 (AP): undeveloped land
- 1947 to 1953 (AP): one structure that appears to be a service station
- 1950 to 2012 (TM): The area is shaded pink, indicating a developed area
- 1967 (AP): one commercial structure
- 1977 to present day (AP): one commercial structure (existing building)

City directories provided for the northern adjacent properties indicate that 11143 Venice Boulevard was occupied by the following:

- 7-Eleven: 1985 to 2014

Eastern Adjacent Properties (11166 Venice Boulevard)

Based on our review of the documents listed above, it appears that the eastern adjacent properties were developed with the following:

- 1894 to 1930 (TM): Undeveloped land
- 1928 (AP): the site appears to be an orchard
- 1938 to 1953 (AP): undeveloped land
- 1950 to 2012 (TM): The area is shaded pink, indicating a developed area
- 1967 to present day (AP): one commercial structure (existing building)

City directories provided for the eastern adjacent properties indicate that 11166 Venice Boulevard was occupied by the following:

- **Various Car Wash Facilities:** 1958 to 2009

Southern Adjacent Properties (3816 Sepulveda Boulevard)

Based on our review of the documents listed above, it appears that the southern adjacent properties were developed with the following:

- 1894 to 1930 TM: Undeveloped land



- 1928 (AP): the site appears to be an orchard
- 1938 to 1947 (AP): undeveloped land
- 1953 (AP): a large circular commercial structure
- 1950 to 2012 (TM): The area is shaded pink, indicating a developed area
- 1967 to 1979 (AP): one rectangular commercial structure
- 1983 to 2016 (AP): the structure is redeveloped into a smaller commercial structure (existing building)

City directories provided for the southern adjacent properties indicate that 3816 Sepulveda Boulevard was occupied by the following:

- Commercial restaurants: 1954 to 2014
- Bauer's Ambulance Service: 2004 to 2014

Western Adjacent Properties (3801 Sepulveda Boulevard)

Based on our review of the documents listed above, it appears that the western adjacent properties were developed with the following:

- 1894 to 1930 (TM): Undeveloped land
- 1928 to 1938 (AP): Undeveloped land
- 1947 to 1953: One commercial structure
- 1967 to 1979: three commercial structures
- 1983 to present day: current car wash facility

Gaps in Historical Sources

Several gaps of greater than five years were identified in the historical records reviewed, from 1902 to 1920, 1938 to 1947, 1954 to 1966, and 1989 to 1994. These gaps are considered insignificant because the subject property use appears to be similar prior to and following the gaps.



Interviews

Rincon performed interviews regarding the subject property and surrounding areas. The purpose of the interviews was to discuss current and historical conditions and to obtain information indicating the presence of RECs in connection with the subject property.

Interview with Owner

A phone interview was conducted with the owner of the subject property on April 14, 2020. Participants of the phone interview included Rincon, ExxonMobil, ETIC, and the Client (Jushi).

The following information was provided by the property owner (ExxonMobil) during the April 14, 2020 phone interview:

- The subject property was formerly occupied by an ExxonMobil retail gasoline service station which was associated with an open unauthorized release case which was opened in 1990; USTs and piping were removed from the site in May 2000.
- The main constituents of concern onsite include benzene, MTBE, TBA, and other fuel oxygenates.
- Active remediation was conducted onsite which included: soil excavation, LPH removals, and operation of an SVE which was reported as having operated for over 9,000 hours and removed 15,000 lbs of hydrocarbons.
- Approximately 55 million gallons of impacted groundwater had been pumped and treated from beneath the subject property.
- Confirmation borings had been completed onsite which confirmed that active remediation had reduced impacts beneath the site to LTCP criteria/non-detectable levels in shallow soil beneath the site.
- Currently, the site is undergoing quarterly groundwater sampling and reporting.
- Case closure was requested in 2015; however, the City of Santa Monica submitted objections to closure.
- LPH had occurred in an offsite well near the adjacent Shell gasoline service station; LPH removal activities had been reported as current.
- Meetings had been held with the RWQCB who indicated that the City of Santa Monica's main concern was the concentrations of TBA in groundwater at the time of closure. Therefore, ExxonMobil and the project environmental consultant agreed to additional monitoring of TBA trends.
- The closest City production well is located about 2,000 feet from the site, which appears to have been a risk driver; however, per ExxonMobil, TBA concentrations in groundwater have stabilized or decreased during monitoring. However, the detection of free product noticed in well RMC-3 (near Shell) has also prompted additional monitoring and has become the primary cleanup focus over the past two years.
- ExxonMobil met with the RWQCB in March 2020 to report that there was no measurable free product recently in well RMC-3; however, groundwater had exhibited a sheen.
- Well destruction has been approved for the wells located within the footprint of the new development (refer to the Well Destruction Work Plan).



- Pursuant to the request of the RWQCB, a few monitoring wells outside the building footprint on the south side of the subject property will not be destructed.
- The RWQCB case manager has indicated that they will not require a new request for closure to be submitted once the LPH issues have been adequately addressed. The project consultant (ETIC) indicated that they continue to monitor the well with the impacts, and once they feel like they have addressed the impacts to the extent practical, the RWQCB can request concurrence from the City of Santa Monica.
- There should be no issues with site redevelopment, as well abandonment has been approved and must be completed by June 15, 2020.
- A vapor barrier should be installed beneath the footprint of any new structures proposed; it will be the new property owners responsibility to implement/install the vapor barrier. It is unknown whether the vapor barrier system should be active or passive.
- There is a Deed Restriction on the subject property which requires a vapor barrier be installed (condition of the sale).
- ExxonMobil is assuming environmental liability until No Further Action (NFA) is granted; once NFA is issued, then the buyer assumes responsibility of site.
- With regard to the risk for vapor intrusion, ExxonMobil indicated that there are no shallow impacts to soil remaining onsite and that the SVE system ran long enough that vapor intrusion is not a risk for the site; the requirement for a vapor barrier is only a condition placed out of an overabundance of security/good practice.

An interview questionnaire was provided to the property owner representative, Mr. Brian Steelman, ExxonMobil Corporation, prior to the site reconnaissance. The questionnaire was completed on April 24, 2020 by Ryan Haughey, Principal with ETIC and environmental consultant for the owner of the subject property. A copy of the completed questionnaire is included in Appendix A. The following information is based on our review of the completed questionnaire.

Mr. Haughey indicated the following:

- The subject property was a former gasoline station. The adjacent property to the east, a car wash, did have a gasoline and diesel fueling station that was removed in 1989.
- The subject property currently consists of a vacant lot.
- Venice Boulevard is located adjacent to the north of the subject property.
- There is a Carl's Jr. restaurant located adjacent to the south of the subject property.
- Sepulveda Boulevard is located adjacent to the west of the subject property.
- There is a hand car wash with a former diesel fueling station located adjacent to the east of the subject property.
- The current owner of the subject property is Exxon Mobil Oil Corporation, formally known as Mobil Oil Corporation; Suzanne H. Schaefer was the previous subject property owner.
- The subject property has been vacant since 2000.
- With regard to the storage or use any of hazardous materials, gasoline USTs were present onsite during the previous service station operation.
- Approximately 3 gallons of gasoline product have been generated recently and is disposed offsite (from continued groundwater monitoring events).
- Mr. Haughey reported that he did not know if the previous service station had drums onsite.



- There has not been evidence of fill dirt having been brought onto the property that originated from a contaminated site or that is of an unknown origin.
- He indicated that there has not been any pits, ponds or lagoons located on the property in connection with waste treatment or waste disposal.
- Mr. Haughy reported that the station prior to redevelopment in 1990 may have had service bays and possibly a clarifier, as well as service bays and possibly hydraulic hoists.
- Stained soil had been present in former underground storage tank excavations.
- Mr. Haughy reported that there had been two generations of USTs present onsite
- The site is serviced by the public water system.
- There are no flooring, drains, or walls located onsite that are stained by substances other than water or are emitting foul odors.
- A groundwater extraction and treatment system previously operated at the property and discharged to the storm drain system.
- To the best of his knowledge there have not been any records indicating the presence of PCBs, pesticides, or herbicides onsite.
- There is a current UST cleanup case open with the Los Angeles Regional Water Quality Control Board. Site assessment have been conducted in compliance with the UST cleanup case.
- He is unaware of any past, threatened, or pending lawsuits or administrative proceedings concerning a release of any hazardous substances or petroleum products involving the property by any owner or occupant of the property.

Mr. Haughy provided a copy of the 1984 Grant Deed as well as the ALTA Commitment for Title Insurance dated 2019.

Interview with Site Manager

The subject property currently consists of a vacant lot; therefore, an interview with a site manager is not applicable.

Interviews with Occupants

The subject property currently consists of a vacant lot; therefore, an interview with site occupants is not applicable.

Interviews with Local Government Officials

Rincon contacted the Los Angeles County RWQCB for records pertaining to the following nearby properties:

- Great West Car Wash, Inc. at 11166 Venice Boulevard; a request submitted to the case worker on April 21, 2020.
- Junes Cleaners – 11127 Venice Boulevard Suite 6; a request for files was submitted on April 21, 2020.
- The Cleaning Store/Venice Cleaning Store/Venice Cleaners – 11277 Venice Boulevard; a request for files was submitted on April 21, 2020.



Interviews with Others

Rincon did not attempt to interview neighboring property owners or others as part of this Phase I ESA.



Site Reconnaissance

Rincon performed an unaccompanied perimeter reconnaissance of the subject property on November 4, 2020. The purpose of the reconnaissance was to observe existing subject property conditions and to obtain information indicating the presence of RECs in connection with the subject property.

Methodology and Limiting Conditions

The site reconnaissance was conducted by:

1. Observing the subject property from public thoroughfares, and
2. Observing the adjacent properties from public thoroughfares.

Current Use of the Property and Adjacent Properties

The subject property currently consists of a vacant lot with perimeter fence. Adjacent businesses/properties include gasoline service stations, automotive repair facilities, fast food restaurants, a car wash, and various other retail/commercial stores.

Past Use of the Property and Adjacent Properties

Based on our site reconnaissance, the subject property appears to have historically been operating as a gasoline service station. Past uses of the adjacent properties are not readily apparent.

Current or Past Uses in the Surrounding Areas

The subject property is surrounded by residential and retail/commercial land uses as detailed in the Site Description section of this report. Past uses of the surrounding area are not readily apparent based on the site reconnaissance.

Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

Geologic, hydrogeologic, hydrologic, and topographic information are as previously stated in the Physical Settings Section of this report.

General Description of Structures

The subject property is currently vacant. There are no structures onsite. A foundation of a former structure was observed in the eastern corner of the subject property.



Roads

The subject property is located east of the intersection of Venice Boulevard and Sepulveda Boulevard.

Potable Water Supply

Water is supplied by the local municipal district.

Sewage Disposal System

The subject property is connected to the local municipal sewer system.

Interior and/or Exterior Observations

Hazardous Substances and Petroleum Products in Connection with Identified Uses

No hazardous substances or petroleum products were identified at the subject property.

Storage Tanks

During the site reconnaissance, no above- or below-ground storage tanks or evidence of underground storage tanks were observed on the subject property.

Odors

During the site reconnaissance, Rincon did not identify any strong, pungent, or noxious odors.

Pools of Liquid

During the site reconnaissance, no pools of liquid were observed.

Drums

During the site reconnaissance, one drum labeled "Hazardous Waste" was observed in the southern corner of the subject property. According to an email dated November 16, 2020 from Marla Madden with Exxon, the drum contains 3 absorbent socks used in an offsite well near the Shell Station. The drum is scheduled for removal from the subject property on Thursday, November 19, 2020.

Hazardous Substances and Petroleum Products Containers Not in Connection with Identified Uses

No hazardous substances or petroleum products not in connection with identified uses were observed at the subject property.



Unidentified Substance Containers

No unidentified substance containers or unidentified containers that might contain hazardous substances were observed during the site reconnaissance.

Indications of Polychlorinated Biphenyls (PCBs)

Rincon did not observe indications of PCBs on the subject property during the site reconnaissance.

Other Conditions of Concern

During the site reconnaissance, Rincon did not note any of the following:

- Stains or corrosion
- Clarifiers and sumps
- Degreasers/parts washers
- Pools of liquid
- Pits, ponds, and lagoons
- Stained soil or stained pavement
- Solid waste/debris
- Wastewater

Wells. There are several groundwater monitoring wells located both on and offsite which are associated with the open Exxon release case.



Evaluation

Findings

Known or suspect RECs associated with the subject property include the following:

- Former onsite agricultural land use
- Onsite open unauthorized release case under verification monitoring, pending closure
- Two adjacent closed unauthorized release sites
- Adjacent Shell gasoline service station with open unauthorized release case
- Two closed nearby (within 1/8 mile) unauthorized release sites
- Location of subject property within the Charnock Well Field MTBE Investigation Area
- Two nearby dry cleaner listings with addresses requiring ground truthing/reconnaissance
- Two adjacent hazardous liquid transmission pipelines
- Drum of absorbent socks in southern corner

Opinions

- A. **Former onsite agricultural land use.** According to the historical resources reviewed, the subject property appears to have been used for agricultural purposes in 1928; however, by 1938, the site appears mostly vacant with a single small structure onsite. Agricultural land use is typically associated with the use of pesticides and arsenic. However, due to the short length of time the land appears to have been used for agricultural purposes and since the site appears to have been redeveloped since at least 1953, the former agricultural land use is considered *de minimis*.
- B. **Onsite open unauthorized release case under verification monitoring, pending closure.** The subject property was historically occupied by a former Mobil gasoline service station. Tanks and associated underground piping had been removed since at least 2005. The subject property is associated with an open LUST case which is currently under verification monitoring. Remedial activities have been conducted, including soil vapor extraction and groundwater extraction. Current phase of the project is groundwater monitoring and sampling/post-remediation monitoring. A work plan to destroy select onsite wells and offsite wells which are no longer part of the groundwater monitoring network has recently been approved by the Los Angeles RWQCB. However, in March 2020 the Water Board indicated that the project consultant cannot destroy onsite wells B-11, V-2, and WC-6, RMC-5, RMC-6, US-6, WC-4, and WC-5. A technical report detailing the results of the well destruction activities need to be submitted to the Water Board by 15 June 2020. Additionally, monitoring/LPH recovery continues at RMC-3. Since the cleanup case is currently “open”, it is considered a *Recognized Environmental Condition*. Continued monitoring of the site wells by Exxon Mobil will progress the site to case closure, at which time the former release would be considered a *Historical Recognized Environmental Condition*.
- C. **Two adjacent closed unauthorized release sites.** EDR reported two adjacent closed release cases as follows:
- 1) Great West Car Wash, Inc. - 11166 Venice Boulevard: Groundwater samples have historically contained detectable concentrations of TPH and BTEX. The closest monitoring well to the



subject property was reported as MW-14, which is located adjacent to the south of the subject property. Detectable concentrations of TPH-g and BTEX were reported in groundwater samples collected from this well as part of the Third Quarter 2005 monitoring event; the gradient was reported as to the north. However, the case was closed in 2006 due to low detections in groundwater. Although TPH-g and BTEX were detected in MW-14 in 2005, depth to groundwater is deep (approximately 80 to 87 feet bgs). Based on the concentrations detected in MW-14 and depth to groundwater, it is unlikely that residual impacts are impacting the subject property at levels that would warrant mitigation.

Therefore, the adjacent closed release is considered a *de minimis*.

- 2) GT International/Steven Jones Automotive Facility - 3817 Sepulveda Boulevard: Based on the location of the former UST at the site, the soils only nature of the case, and the downgradient location with regard to groundwater flow (away from the subject property) the adjacent former release is not expected to impact the subject property. Therefore, the closed release is considered *de minimis*.
- D. **Adjacent Shell gasoline service station with open unauthorized release case.** The active Shell gasoline service station is located at 3801 Sepulveda Boulevard. The site was identified in 1996 as a potential source of MTBE to drinking water and a contributor to the regional impacts associated with the Charnock Well Field MTBE Investigation Area. The release case remains open and under remediation. According to GeoTracker, wells are being sampled during remedial action for progress assessment and a groundwater pump and treat system is operating at the Shell facility. According to the January 2020 *Quarterly Status Report Fourth Quarter*, the groundwater elevation map for the shallow aquifer indicated a gradient to the west (in the vicinity of the subject property). The groundwater elevation contour map for the Upper Silverado Aquifer indicated a gradient to the north (in the vicinity of the subject property). Due to the current reported groundwater gradients and depth to groundwater (approximately 80 to 87 feet bgs), it is unlikely that the Shell site is affecting the subject property at levels which would require mitigation. Therefore, the adjacent Shell site is considered *de minimis*.
- E. **Two closed nearby (within 1/8 mile) unauthorized release sites.** EDR reported two other nearby release sites as follows: 1) Chevron #9-0561 - 3775 Sepulveda Boulevard (approximately 200 feet to the west) and 2) AM PM Special Delivery Service, Inc. - 11223 Venice Boulevard (approximately 350 feet to the west). However, based on the closed case statuses, downgradient locations of these sites with regard to groundwater flow (away from the subject property), and depth to groundwater (approximately 80 to 87 feet bgs), the former releases are not expected to impact the subject property and are therefore considered *de minimis*.
- F. **Location of subject property within the Charnock Well Field MTBE Investigation Area.** MTBE was detected in wells supplying drinking water to the City of Santa Monica (the Charnock Well Field) in 1995. By June 13, 1996, all the supply wells at the Charnock Well Field were shut down. In correspondence dated June 19, 1997 the Los Angeles Region RWQCB and the US EPA required that PRPs investigate their sites. Because Mobil operated at the subject property (which is approximately 2,500 feet southeast of the Charnock Well Field), Mobil was named a PRP. Following the construction of a new treatment system, the well field was reactivated during the fourth quarter of 2010. Although Mobil was named a PRP, a settlement was made, and the former onsite Mobil service station and USTs have been removed since at least 2005. This could be a *Recognized Environmental Condition* if there is any ongoing migration of contaminants from the subject property to the Charnock wells. However, once a No Further Action letter issued by the Water Board for the Mobil site, this issue likely to be a *Historic Recognized Environmental Condition* and not an active *Recognized Environmental Condition*.



- G. **Two nearby dry cleaner listings with addresses requiring ground truthing/reconnaissance.** EDR reported historical dry-cleaning facilities at the following nearby locations: 1) Junes Cleaners – 11127 Venice Boulevard Suite 6 (located approximately 300 feet to the north) and 2) The Cleaning Store/Venice Cleaning Store/Venice Cleaners – 11277 Venice Boulevard (located approximately 775 feet to the west). Both listings indicate that the facilities operated as dry cleaners and used perchloroethylene and other hazardous materials. Additionally, although the sites were not reported on release databases, there is the potential for an unauthorized release to have occurred. Based on the addresses reported for these facilities, there is a strong likelihood that these sites are the same facility. During the site reconnaissance, June's Cleaners was observed at 11127 Venice Boulevard and 11277 Venice Boulevard could not be located. Based on the distance and potentially upgradient location of the June's Cleaner site, if a release of perchloroethylene or other hazardous materials occurs, soil vapor impacts could extend beneath subject property. Therefore, the facility is considered a *Potential Recognized Environmental Condition*.
- H. **Two adjacent hazardous liquid transmission pipelines.** According to the NPMS, there are three active hazardous liquid pipelines running adjacent to the subject property: 1) a Chevron-operated gasoline pipeline running along Venice Boulevard, 2) a Crimson-operated crude oil pipeline running along Venice Boulevard, and 3) a Torrance Valley Pipeline Company-operated crude oil pipeline running along Sepulveda Boulevard. No accidents or incidents involving these pipelines were reported in the vicinity of the subject property; therefore, the gasoline and oil pipelines are considered *de minimis*.
- I. **Drum of unknown contents in southern corner.** During the site reconnaissance, a drum was observed in the southern corner of the subject property. According to information provided by Exxon, the drum contains absorbent socks and is scheduled for removal from the subject property on Thursday, November 19, 2020. Therefore, the drum is considered *de minimis*.

Conclusions

Rincon has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527 for the subject property located at 3800 Sepulveda Boulevard in Culver City, California. Any exceptions to, or deletions from, this practice are described in the Deviations section of this report.

This assessment has revealed evidence of two *Recognized Environmental Conditions/Potential Historical Recognized Environmental Conditions* and one *Potential Recognized Environmental Condition* as follows:

Recognized Environmental Conditions/Potential Historical Recognized Environmental Conditions

1. Onsite open unauthorized release case under verification monitoring, pending closure
2. Location of subject property within the Charnock Well Field MTBE Investigation Area

Potential Recognized Environmental Condition

3. Nearby upgradient/crossgradient historical dry cleaner



Recommendations

Based on the current subject property case status, we recommend continued monitoring of the site wells by Exxon Mobil as determined by the LA RWQCB to move forward in achieving case closure. Once closure is obtained, Exxon Mobil should abandon all the wells, probes, etc. that exist onsite and offsite.

Residual impacts may exist beneath the subject property as a result of the former onsite Mobil gasoline service station operations, or as a result of the adjacent Shell release and former adjacent release cases. Additionally, there is an upgradient/crossgradient historical dry cleaner located approximately 300 feet north of the subject property. The facility is reported to have used perchloroethylene and other hazardous materials. However, it is our understanding that a Deed Restriction has been filed for the subject property which requires a vapor barrier be installed beneath any new onsite structures. We recommend that the proposed building be developed with a robust vapor barrier system to include a properly designed vapor mitigation system. Therefore, the risk for vapor intrusion would be low.

Although not considered a REC, Rincon recommends removal and proper disposal of the drum of "hazardous waste."

Deviations

Deviations from ASTM E1527-13 practice were not encountered during the completion of this Phase I ESA.



References

The following materials were used in preparation of this Phase I ESA:

Aerial Photographs

Photos provided by Environmental Data Resources, Inc. (EDR) on April 16, 2020.

City Directory Listings

Listings provided by EDR on April 16, 2020.

Environmental Database

EDR report dated April 16, 2020.

Geology

California Geologic Survey (CGS), *California Geomorphic Provinces Note 36*, December 2002.
Accessed April 15, 2020;

Dibblee, 1991. Geologic Quadrangle of Beverly Hills and Santa Ana Quadrangles.

Groundwater

California Natural Resources Agency, California Department of Water Resources, *California Groundwater Bulletin 118*, 2003, <https://water.ca.gov/Programs/Groundwater-Management/Bulletin-118>. Accessed April 15, 2020;

RWQCB online database (GeoTracker), <http://geotracker.waterboards.ca.gov/>. Accessed April 15, 2020.

Oil and Gas Records

State of California Department of Conservation Geologic Energy Management Division (CalGEM, formerly DOGGR) website: <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>. Accessed April 2020.

PFAS (Per- and Polyfluoroalkyl Substances)

California State Water Resources Control Board (SWRCB) online 2019 Statewide PFAS Investigation online Public Map Viewer: <https://www.waterboards.ca.gov/pfas/>. Accessed April 21, 2020.

Pipelines

National Pipeline Mapping System (NPMS) Public Map Viewer:
<https://www.npms.phmsa.dot.gov/PublicViewer/>. Accessed April 15, 2020.

Topography

USGS topographic map (Beverly Hills Quadrangle, 2018).



Signatures of Environmental Professionals

The qualified environmental professionals that are responsible for preparing the report include Walt Hamann, Meghan Hearne, and Amanda Duval. Their qualifications are summarized in the following section.

"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."



Signature

Walt Hamann, PG, CEG, CHG

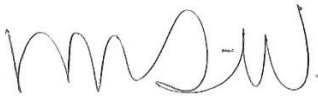
Name

December 21, 2020

Date

Vice President

Title



Signature

Meghan Hearne

Name

December 21, 2020

Date

Senior Environmental Scientist

Title

Qualifications of Environmental Consultants

The environmental consultants responsible for conducting this Phase I ESA and preparing the report include Walt Hamann, Meghan Hearne, and Amanda Duval. Their qualifications are summarized below.

Environmental Professional Qualifications	X2.1.1 (2) (i) - Professional Engineer or Professional Geologist License or Registration, and 3 years of full-time relevant experience	X2.1.1 (2) (ii) - Licensed or certified by the Federal Government, State, Tribe, or U.S. Territory to perform environmental inquiries	X2.1.1 (2) (iii) – Baccalaureate or Higher Degree from and accredited institution of higher education in a discipline of engineering or science and the equivalent of 5 years of full-time relevant experience	X2.1.1 (2) (iii) – Equivalent of 10 years of full-time relevant experience
Walt Hamann	PG, CHG, CEG		MS Geology	30 years
Meghan Hearne	GIT		MS Geology	15 years
Amanda Duval			BS Earth Science	1 year

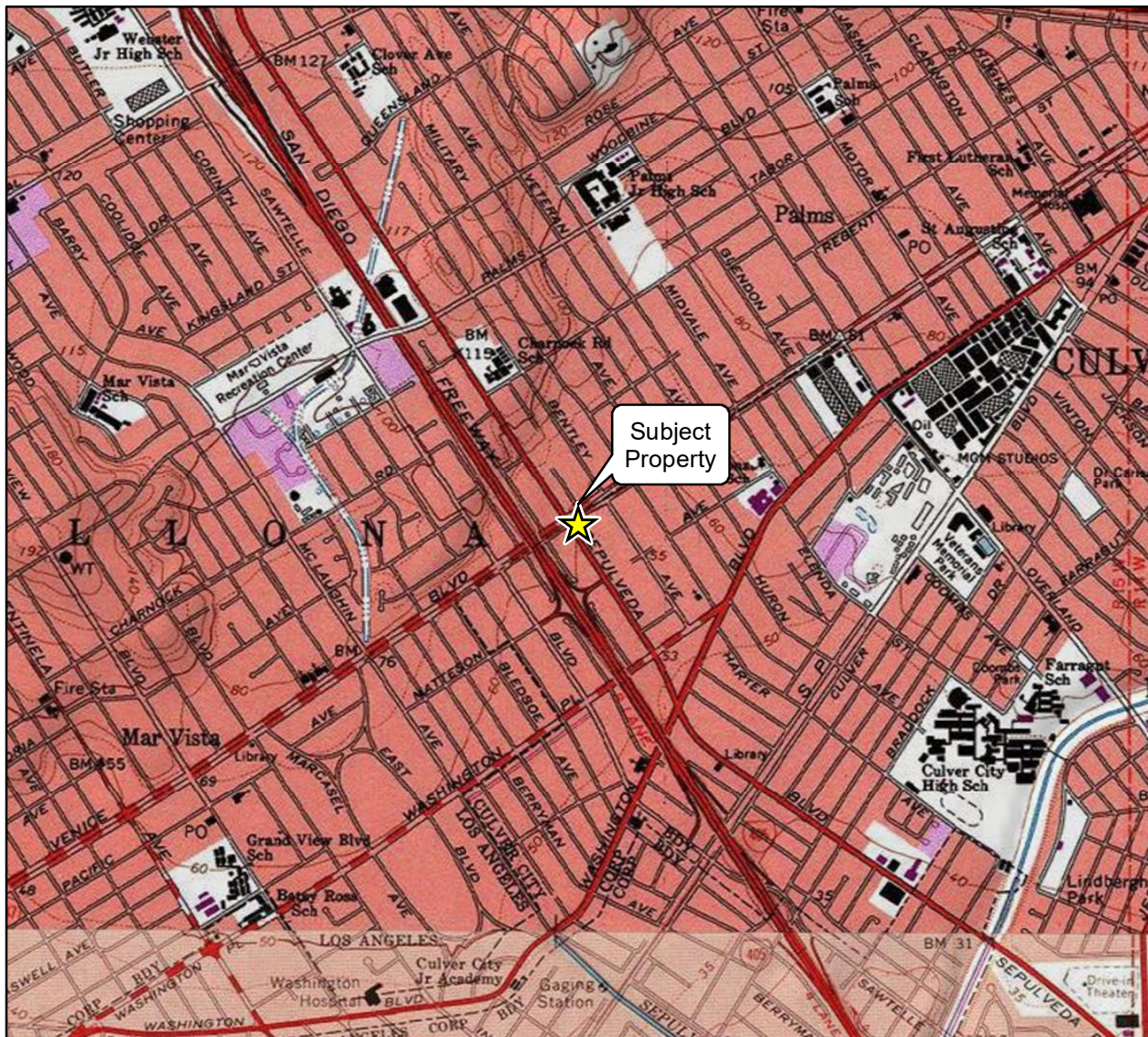
Walt Hamann, PG, CEG, CHG, is a Principal and Senior Geologist with Rincon Consultants. He holds a Bachelor of Arts degree in geology from the University of California, Santa Barbara and a Master of Science degree in geology from the University of California, Los Angeles. He has over 30 years of experience conducting assessment and remediation projects and has prepared or overseen the preparation of hundreds of Phase I and Phase II Environmental Site Assessments throughout California. Mr. Hamann is a Professional Geologist (#4742), Certified Engineering Geologist (#1635), and Certified Hydrogeologist (#208) with the State of California.

Meghan Hearne is an Environmental Scientist with Rincon Consultants. She holds a Master of Science degree in Geology from the University of North Carolina at Wilmington. Ms. Hearne has experience working on geotechnical investigations and Phase I and Phase II Environmental Site Assessments for a variety of commercial, rural, and industrial properties. Ms. Hearne's responsibilities at Rincon include implementation of Phase I and Phase II Environmental Site Assessments and reports, as well as Project Management.

Amanda Duval is an Environmental Scientist with Rincon Consultants. She holds a Bachelor of Science degree in Earth Science from the University of California, San Diego. Ms. Duval's responsibilities at Rincon include implementation of Phase I Environmental Site Assessment reports for a variety of commercial, rural, and industrial properties. She also has experience with Phase II Environmental Site Assessments, which involve soil, groundwater, and soil vapor assessments.

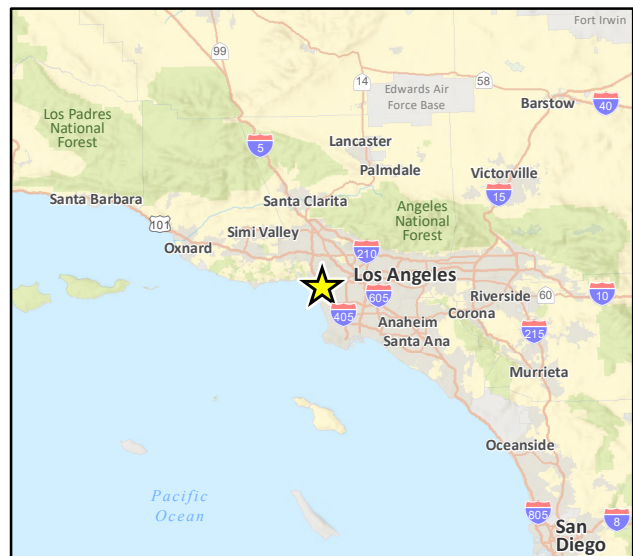


Figures



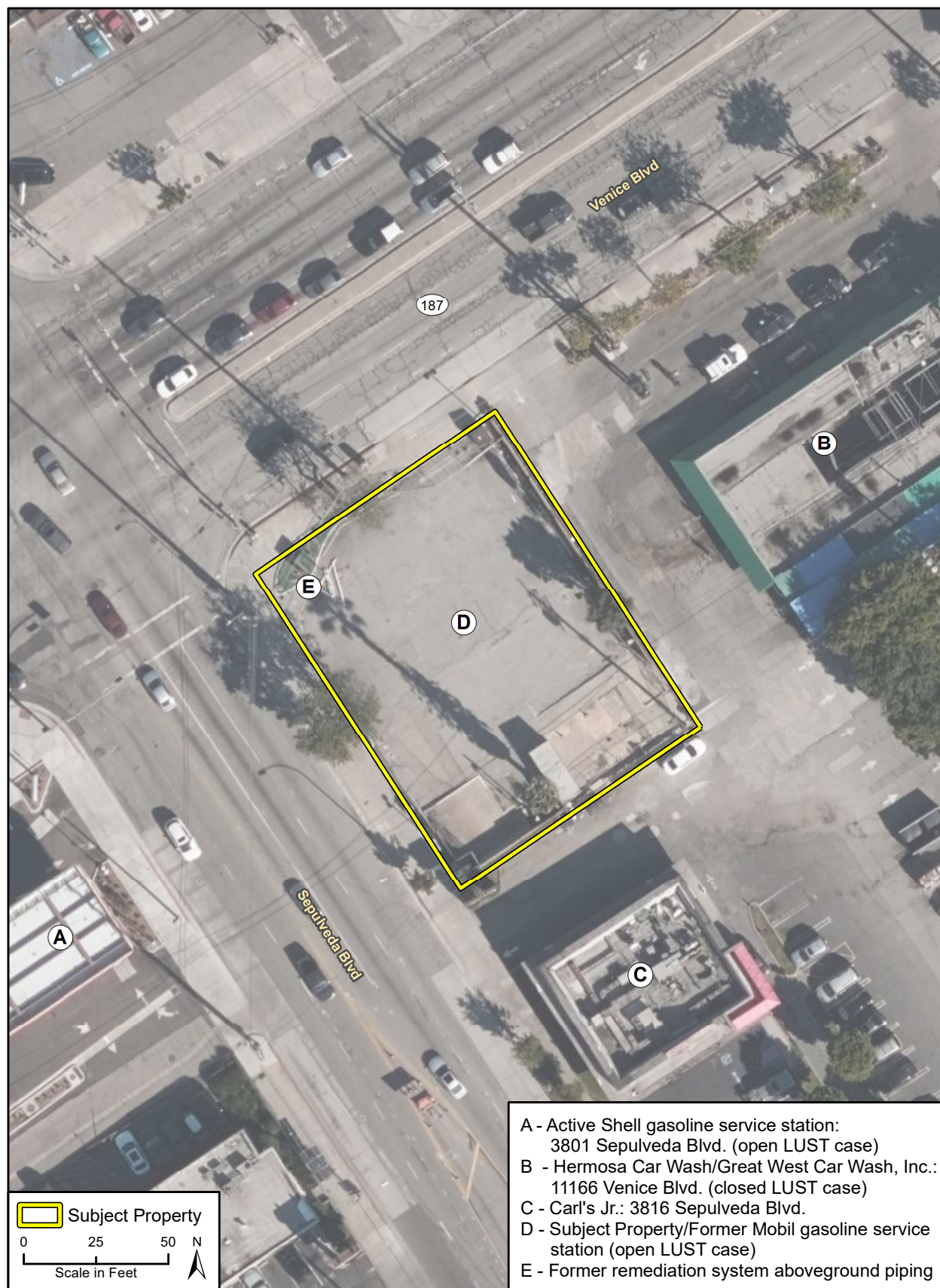
Imagery provided by National Geographic Society, Esri, and their licensors © 2020. The topographic representation depicted in this map may not portray all of the features currently found in the vicinity today and/or features depicted in this map may have changed since the original topographic map was assembled.

0 1,000 2,000
Scale in Feet



Vicinity Map

Figure 1



Site Map

Figure 2



Imagery provided by Microsoft Bing and its licensors © 2020.

Adjacent Land Use Map

Figure 3

3800 Sepulveda Boulevard, Culver City, California
Phase I Environmental Site Assessment



Photograph 1. View of the subject property, facing north.



Photograph 2. View of the onsite 55-gallon drum.



Photograph 3. View of the northern adjacent 7 Eleven convenience store, facing north.



Photograph 4. View of the eastern adjacent car wash, facing southeast.



Photograph 5. View of the southern adjacent Carl's Jr. Restaurant, facing southeast.



Photograph 6. View of the western adjacent Shell gasoline station, facing west.



3800 Sepulveda Boulevard, Culver City, California
Phase I Environmental Site Assessment



Photograph 7. View looking across the subject property, facing south.



Photograph 8. View of two out of multiple onsite wells observed.



Photograph 9. View of the subject property taken from the intersection of Sepulveda Boulevard and Venice Boulevard, facing southwest.

