

Phase II Environmental Site Assessment

Vacant Land – Euclid Schaefer Parcel

NWC of S. Euclid Avenue & Schaefer Avenue,
Chino, California

EBI Project No. I222000067

March 8, 2022

Prepared for:

Orbis Real Estate Partners LLC
280 Newport Center Drive, Suite 240
Newport Beach, California 92660

Prepared by:



March 8, 2022

Mr. Will Johnston
Orbis Real Estate Partners LLC
280 Newport Center Drive, Suite 240
Newport Beach, California 92660

Subject: Phase II Environmental Site Assessment
Vacant Land – Euclid Schaefer Parcel
NWC of South Euclid Avenue & Schaefer Avenue, Chino, California
EBI Project No. 1222000067

Dear Mr. Johnston:

In accordance with the Proposal and Standard Conditions for Engagement approved by yourself on February 8, 2022, EnviroBusiness, Inc. (dba EBI Consulting, hereinafter “EBI”) is pleased to submit this Phase II Environmental Site Assessment (ESA) report for the above-referenced property (herein referred to as the Subject Property).

This Report is addressed to *Orbis Real Estate Partners LLC*. This Report is for the use and benefit of, and may be relied upon by, *Orbis Real Estate Partners LLC*; initial and subsequent holders from time to time of any debt and/or debt securities secured, directly or indirectly, any participation interest in such debt; any indenture trustee, servicer, or other agent acting on behalf of such holders of such debt and/or debt securities; rating agencies; and the institutional provider(s) from time to time of any liquidity facility or credit support for such financings, and their respective successors and assigns.

The information contained in this report has received appropriate technical review and approval. The conclusions represent professional judgments and are founded upon the findings of the investigations identified in the report and the interpretation of such data based on our experience and expertise according to the existing standard of care. No other warranty or limitation exists, either express or implied.

The conclusions of this Report are based on soil analytical data prepared by SGS Laboratories, soil screening results obtained utilizing a field screening instrument, and field observations recorded by EBI personnel.

There are no intended or unintended third party beneficiaries to this Report, except as expressly stated herein.

EBI is an independent contractor, not an employee of either the issuer or the borrower, and its compensation was not based on the findings or recommendations made in the Report or on the closing of any business transaction.

Thank you for the opportunity to prepare this Report, and assist you with this project. Please call us if you have any questions or if we may be of further assistance.

Respectfully submitted,
EBI CONSULTING

Lizette Ruiz
Author/Environmental Scientist

Stephanie Clorey
Reviewer/ Senior Project Manager

Brett Bardsley, P.G.
Senior Project Manager
(425) 985-7302

The Environmental Professionals listed above performed this Phase II ESA in general conformance with the ASTM E1903-11 Standard Practice for Phase II ESAs. The listed individuals meet the qualifications for individuals completing or overseeing all appropriate inquiries, and possess sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding the existence of environmental conditions on the property. Any work completed on this Phase II ESA by an individual who is not considered an environmental professional was completed under the supervision or responsible charge of the environmental professional.

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1.0 INTRODUCTION

In accordance with our Proposal and Standard Conditions for Engagement, EnviroBusiness, Inc. (dba EBI Consulting, hereinafter “EBI”) is pleased to submit our *Phase II Environmental Site Assessment (ESA) Report (Report)* on the property located at the northwest corner of South Euclid Avenue & Schaefer Avenue, Chino, California (the Subject Property). Ms. Lizette Ruiz of EBI conducted the investigation at the Subject Property on February 24, 2022.

1.1 BACKGROUND

EBI was requested to conduct a Phase II ESA to evaluate the potential impact to the Subject Property from the following recognized environmental concern (REC) identified in EBI’s (February 3, 2022) Phase I ESA report:

- Based on aerial photographic review, the Subject Property has been agricultural and agricultural cropland. from at least 1938 to present. As such, it is likely that agricultural chemicals, such as pesticides, herbicides and fertilizers, have been stored, managed, and applied to the Subject Property. The likely storage, management, and application of agricultural chemicals (pesticides, herbicides and fertilizers) in conjunction with the planned change in land-use from agricultural to commercial/industrial is representative of a recognized environmental condition (REC) in connection with the Subject Property.

1.2 STATEMENT OF OBJECTIVES

The primary objective of this Phase II ESA was to evaluate potential impact to the Subject Property from the REC identified in the Phase I ESA prepared by EBI (February 3, 2022) for the purpose of providing sufficient information regarding the nature and potential extent of contamination to assist in making informed business decisions about the property; and where applicable, providing the level of knowledge necessary to satisfy the innocent purchaser defense under CERCLA. Review of the California Department of Toxic Substances Control’s (DTSC’s) August 7, 2008 document entitled *Interim Guidance for Sampling Agricultural Properties (Third Revision)* indicates the following:

- 1) In general, the primary chemicals of potential concern (COPCs) at agricultural sites in California are organochlorine pesticides (OCPs), such as DDT, toxaphene, and dieldrin; and arsenic.

According to the DTSC (2008), OCPs were first introduced into California agriculture in 1944 and reached peak usage in the 1960s. In addition, arsenic in the form of arsenical herbicides has been applied to many agricultural properties and elevated levels of arsenic have been reported in the evaluation of these properties.

- 2) The subsurface impacts, if present, are generally limited to near surface soil (to evaluate whether impacts related to historical land uses are present at a property, the guidance recommends collecting soil samples for laboratory chemical analysis at depths between the ground surface and 6 inches below the ground surface [bgs]).

Based on the information noted above, the focus of the Phase II ESA conducted by EBA were the near surface soils beneath the Subject Property. The scope was conducted in accordance with DTSC’s (2008) *Interim Guidance for Sampling Agricultural Properties*. Please note that in that document the DTSC presumes that agricultural chemicals were historically applied uniformly across a site in any given year and that the

variation across a site will be relatively small. Thus, to achieve the objectives of this investigation, EBI performed the following tasks:

- 1) Contacted the local utility locating service DigAlert (Ticket #B220560278) prior to undertaking subsurface explorations on-site.
- 2) Collected a total of 20 discrete surface soil samples in a grid pattern across the Subject Property and described the physical characteristics of the soil samples on boring logs. The samples were collected using hand tools.
- 3) From the 20 discrete surface samples collected, a total of five composite samples were formed by laboratory compositing and analyzed for organochlorine pesticides (OCPs) by United States Environmental Protection Agency (EPA) Method 8081. The composite surface samples were comprised of four (4) discrete surface soil samples from adjacent sampling locations. In addition, one discrete sample from each of the five composite samples was analyzed by the laboratory for total arsenic by EPA Method 6010. One field duplicate sample was also collected and analyzed for OCPs and total arsenic.
- 4) Prepared this summary of pertinent information obtained during this investigation including accompanying illustrations and appendices, along with EBI's findings and preliminary conclusions regarding the presence or absence of contamination in soils beneath the Subject Property in the areas investigated.

I.3 LIMITATIONS AND ASSUMPTIONS

This Report was prepared for the use of Orbis Real Estate Partners LLC. It was performed in accordance with ASTM E1903-11, accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI are based solely on the information obtained during the subsurface investigation. EBI renders no opinion as to the presence of potential contamination in the areas not investigated. The observations in this Report are valid on the date of the investigation. Any additional information that becomes available concerning the Subject Property should be provided to EBI so that our conclusions may be revised and modified, if necessary. This Report has been prepared in accordance with the proposal approved by Orbis Real Estate Partners LLC and with the limitations and assumptions described below, all of which are integral parts of this Report. No other warranty, expressed or implied, is made.

Limitations

1. The observations described in this Report were made under the conditions stated herein. The conclusions presented are based solely upon the services described, and not on scientific tasks or procedures beyond the scope of described services or the time and budgetary constraints imposed by Client. The work described in this Report was carried out in accordance with terms and conditions in our Authorization Letter and Agreement for Environmental Services regarding the Site, which are incorporated herein by references.
2. In preparing this Report, EBI has relied on certain information provided by state and other referenced parties, and on information contained in the files of federal, state and/or local agencies available to EBI at the time of the assessment. Although there may have been some degree of overlap in the information provided by these various sources, EBI did not attempt to independently verify the

accuracy or completeness of all information reviewed or received during the course of these Environmental Services.

3. Observations were made of the Site and of structures on the Site as indicated within the Report. Where access to portions of the Site or to structures on the Site was unavailable or limited, EBI renders no opinion as to the presence of oil or hazardous materials (OHM) in that portion of the Site or structure. In addition, EBI renders no opinion as to the presence of OHM or the presence of indirect evidence relating to OHM where direct observation of the interior walls, floor, or ceiling of a structure on a Site was obstructed by objects or coverings on or over these surfaces. No representations concerning insulating material is expressed or implied.
4. EBI did not perform testing or analyses to determine the presence or concentration of asbestos, radon, or lead at the Site unless specifically stated otherwise in the Report. Similarly, no investigation of dust or air quality was conducted unless specifically stated otherwise in the Report.
5. The purpose of this Report is to assess the physical characteristics of the Site with respect to the presence of OHM in the environment. No specific attempt was made to determine the compliance of present or past owners or operators of the Site with federal, state, or local laws or regulations (environmental or otherwise).
6. Except as noted in the Report, no quantitative laboratory testing was performed as part of the assessment. Where such analyses have been conducted by an outside laboratory, EBI has relied upon the data provided, and has not conducted an independent evaluation of the reliability of this data.
7. Any qualitative or quantitative information regarding the Site, which was not available to EBI at the time of this assessment may result in a modification of the representations made herein.
8. It is acknowledged that EBI judgments shall not be based on scientific or technical test or procedures beyond the scope of the Services or beyond the time and budgetary constraints imposed by Client. It is acknowledged further that EBI conclusions shall not rest on pure science but on such considerations as economic feasibility and available alternatives. Client also acknowledges that, because geologic and soil formations are inherently random, variable, and indeterminate in nature, the Services and opinions provided under this Agreement with respect to such Services, are not guaranteed to be a representation of actual conditions on the Site, which are also subject to change with time as a result of natural or man-made processes, including water permeation. In performing the Services, EBI shall use that degree of care and skill ordinarily exercised by environmental consultants or engineers performing similar services in the same or similar locality. The standard of care shall be determined solely at the time the Services are rendered and not according to standards utilized at a later date. The Services shall be rendered without any other warranty, expressed or implied, including, without limitation, the warranty of merchant ability and the warranty of fitness for a particular purpose.
9. Client and EBI agree that to the fullest extent permitted by law, EBI shall not be liable to Client for any special, indirect or consequential damages whatsoever, whether caused by EBI's negligence, errors, omissions, strict liability, breach of contract, breach of warranty or other cause of causes whatsoever.

Assumptions

- I. This Phase II ESA does not address the evaluation of business environmental risks in light of data collected through the Phase II ESA process. Such evaluation is a function of site and transaction-specific variables, and of the user's objectives and risk tolerance. This practice contemplates that the Phase II ESA process was planned and conducted with such variables in mind, and that the user will

evaluate legal, business and environmental risks in light of known data relating to the particular site and transaction, and in consultation with legal and business advisors as well as the Phase II Assessor.

2. The ASTM E1903-II does not define the threshold levels at which target analytes pose a concern of significance to the user. Users may apply this practice not only in light of applicable regulatory criteria and relevant liability principles, but also to meet self-defined objectives.
3. The scope of work for this Phase II ESA is site-specific and context-specific. The assessment process defined by ASTM E1903-II is intended to generate sound, objective, and defensible information sufficient to satisfy diverse user objectives.
4. No Phase II ESA can eliminate all uncertainty. Furthermore, any sample, either surface or subsurface, taken for chemical testing may or may not be representative of a larger population. Professional judgment and interpretation are inherent in the process, and even when exercised in accordance with objective scientific principles, uncertainty is inevitable. Additional assessment beyond that which was reasonably undertaken may reduce the uncertainty.
5. Even when Phase II ESA work is executed competently and in accordance with ASTM E1903-II, it must be recognized that certain conditions present especially difficult target analyte detection problems. Such conditions may include, but are not limited to, complex geological settings, unusual or generally poorly understood behavior and fate characteristics of certain substances, complex, discontinuous, random, or spotty distributions of existing target analytes, physical impediments to investigation imposed by the location of utilities and other man-made objects, and the inherent limitations of assessment technologies.
6. The Phase II ESA is intended to develop and present sound, scientifically valid data concerning actual site conditions. It shall not be the role of the Phase II Assessor to provide legal or business advice.

1.4 SPECIAL TERMS AND CONDITIONS

This Phase II ESA (the report) has been prepared to assist Orbis Real Estate Partners LLC in its underwriting of a proposed mortgage loan on the Subject Property. This report can be relied upon by only the parties stated in the transmittal letter at the front of this report. EBI's liability to a purchaser wishing to use this report is limited to the cost of the report. Amendments to EBI's limitations as stated herein that may occur after issuance of the report are considered to be included in this report. Payment for the report is made by, and EBI's contract and report extends to Orbis Real Estate Partners LLC only, in accordance with our Standard Conditions for Engagement and, Authorization Letter and Agreement for Environmental Services.

2.0 SUBJECT PROPERTY BACKGROUND

2.1 SUBJECT PROPERTY DESCRIPTION AND FEATURES

Information regarding the Subject Property description, improvements, and operations is summarized below:

PROPERTY DESCRIPTION, IMPROVEMENTS, AND OPERATIONS	
Address	NWC of S. Euclid Avenue & Schaefer Avenue, Chino, California
Location	Northwest corner of the intersection of South Euclid Avenue & Schaefer Avenue
Property Owner	ZIVELONGHI INVESTMENT CO LLC
Number of Parcels	One
Total Land Area	10.36 AC
Number/Type of Buildings	One produce storage and resale building
Number of Stories	Single-story
Date of Construction	2005
Area (SF)	Unknown
Basement	None
Operations	Agricultural activities, fruit sales.
Site Characteristics	The remaining portions of the Subject Property are occupied by agricultural cropland.

2.2 PHYSICAL SETTING

Information regarding the physical settings at the Subject Property and immediate vicinity is summarized below:

PHYSICAL SETTING DESCRIPTIONS	
Regional Geology	Information concerning the geology of the Subject Property was obtained from the USGS Ground Water Atlas of the United States, California region (1995). The Subject Property is located within the Pacific Border physiographic province, which is characterized by steep rolling hills and mountains and consists of severely folded, faulted, commonly metamorphosed marine and continental sediments.
Depth to Bedrock	No bedrock outcroppings were noted at the Subject Property. Depth to bedrock is assumed to be greater than or equal to 0.5 feet, the total depth explored.
Surficial Features	Surface drainage on the Subject Property occurs over land to the surrounding streets primarily to the south. No indication of cross-lot runoff, swales, drainage flows, or active rills or gullies were observed on the Subject Property.
Surficial Soils	According to the Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS) website (http://websoilsurvey.nrcs.usda.gov/app/), the dominant soil composition in the vicinity of the Project Site is classified as Hilmar series. This soil consists of shallow, somewhat poorly drained, farmland soils consisting of loamy fine sand and loamy sand. The soil extends to a depth of 60 inches. The depth to bedrock is greater than 80 inches.
Soil Stratigraphy Encountered during the Investigation	Soil stratigraphy encountered during the investigation consisted of soft, dark brown silt with trace-fine sand, and fine gravel.

PHYSICAL SETTING DESCRIPTIONS	
Estimated Direction of Groundwater Flow	Local groundwater gradient is expected to follow surface topography; therefore, groundwater flow near the Subject Property is expected to flow to the south. Groundwater depths and flow gradients are best evaluated by a subsurface investigation involving the installation of at least three groundwater-monitoring wells, survey of well elevations, and precise measurements of hydraulic head. Calculation of groundwater flow directions based on relative differences of hydraulic head on the Subject Property was not included in this scope of work.
Depth to Groundwater (encountered during the investigation)	Shallow groundwater was not encountered during the investigation.

2.3 SITE HISTORY AND LAND USE

According to the Phase I ESA prepared by EBI (February 3, 2022), the site history and land use is summarized in the following table:

Period	Site History And Land Use
Circa 1933	Undeveloped, wooded land.
1938 to Present	Agricultural use.

2.4 ADJACENT PROPERTY LAND USE

Property use in the vicinity of the Subject Property is primarily characterized by residential development as well as limited retail development, agricultural and undeveloped land.

ADJOINING PROPERTIES	
North	The Subject Property is bound to the north by agricultural land, beyond which is a multifamily residential community.
South	The Subject Property is bound to the south by Schaefer Avenue, beyond which is a retail center - Casa Diaz Mexican Restaurant (7041 Schaefer Avenue), Chase Bank (7033 Schaefer Avenue) and Chino Smiles Dentistry and Orthodontics (6961 Schaefer Avenue).
East	The Subject Property is bound to the east by South Euclid Avenue followed by agricultural land.
West	The Subject Property is bound to the west by Fern Avenue followed by single-family residential development.

2.5 SUMMARY OF PREVIOUS ENVIRONMENTAL ASSESSMENTS

EBI was requested to conduct a Phase II ESA to evaluate the potential impact to the Subject Property from the following items of environmental concern identified in EBI's (February 3, 2022) Phase I ESA report:

- Based on aerial photographic review, the Subject Property has been agricultural and agricultural cropland. from at least 1938 to present. As such, it is likely that agricultural chemicals, such as pesticides, herbicides and fertilizers, have been stored, managed, and applied to the Subject Property. The likely storage, management, and application of agricultural chemicals (pesticides, herbicides and fertilizers) in conjunction with the planned change in land-use from agricultural to commercial/industrial is representative of a REC in connection with the Subject Property.

3.0 RATIONALE AND WORK PERFORMED

3.1 RATIONALE

3.1.1 Conceptual Model

The Conceptual Model is a representation of hypothesized current site conditions, which describes the physical setting characteristics of a site and the likely distribution of target contaminants (in soil, air, ground water, surface water and/or sediments) that might have resulted from a known or likely release and the risk they pose to human and/or ecological receptors. This Conceptual Model takes into consideration the potential distributions of contaminants with respect to the properties, behaviors and fate and transport characteristics of the contaminant in a setting such as that being assessed. The sampling plan was designed to provide for the collection of potentially contaminated environmental media, if they occur, at locations and depths where the highest concentrations are likely to occur.

Site Environmental Concerns		Site Physical Characteristics		Onsite Environmental Receptors	
RECs	COC's	Primary Release Media	Fate & Transport	Potential Exposure Route(s)	Potential Human Exposure
Agricultural Field	Organochlorine Pesticides (OCPs) Arsenic	Soil	Soil	Ingestion Inhalation Dermal (direct Contact)	Residents Tenants Site workers

COC = contaminants of concern

Assumptions:

1. Assumes the Subject Property retains existing use (Commercial/Residential)
2. Construction Worker exposure is limited due to short exposure duration

3.1.2 Rationale for Soil Boring Placement

The rationale for the placement of the soil borings was based on the 1) the *Likely Release Areas* that target analytes were first introduced into environmental media as a result of a release; and 2) the likely vertical and horizontal migration of the release.

3.1.3 Chemical Testing Plan

The chemical testing plan was designed to detect the target analytes that are present in, or have been released or potentially have been released to, environmental media at the site, and which are of interest in the context of the particular Phase II ESA and its objectives, the presence of which will be sought and concentrations of which will be quantified through chemical testing.

3.1.4 Deviations from the Proposed Scope of Work

There were no deviations to the proposed scope of work.

3.2 EXPLORATION, SAMPLING, AND TEST SCREENING METHODS

3.2.1 Pre-Drilling Activities

EBI requested DigAlert to mark-out the location of Subject Property utilities.

Personal health and safety precautions were followed in accordance with applicable federal and state law or local equivalents and any requirements imposed by the owner, occupant, or field personnel. EBI prepared a site-specific health and safety plan (HASP) and conducted a health and safety meeting with the onsite personnel prior to the drilling activities. No additional pre-drilling activities were performed as part of this investigation.

3.2.2 Soil Borings

A total of 20 soil borings were advanced in a grid pattern across the Subject Property. Near surface soil samples were collected from the borings using a hand shovel at depths ranging from the ground surface to approximately six inches bgs. EBI recorded soil sampling information and the physical characteristics of each soil sample onto boring logs presented in Appendix B.

**TABLE 3.2.3
 SUMMARY OF SOIL BORING DETAILS**

Boring ID#	Location	Termination Depth/Reason (feet bgs)	Depth to Groundwater (feet)	Sample ID #/ Depths	Target Analytes/ EPA Method
B-1 through B-4	West end of Subject Property	0.5 (termination per SOW)	Not Encountered	Composite B-1, B-2, B-3, B-4	OCPs/8081 Arsenic/6010
B-5 through B-8	West portion of Subject Property	0.5 (termination per SOW)	Not Encountered	Composite B-5, B-6, B-7, B-8	OCPs/8081 Arsenic/6010
B-9 through B-12	Center portion of Subject Property	0.5 (termination per SOW)	Not Encountered	Composite B-9, B-10, B-11, B-12	OCPs/8081 Arsenic/6010
B-13 through B-16	East portion of Subject Property	0.5 (termination per SOW)	Not Encountered	Composite B-13, B-14, B-15, B-16	OCPs/8081 Arsenic/6010
B-17 through B-20	East end of Subject Property	0.5 (termination per SOW)	Not Encountered	Composite B-17, B-18, B-19, B-20	OCPs/8081 Arsenic/6010
Notes: OCPs - organochlorine pesticides (OCPs) via EPA Method 8081 B – Boring S – Soil Sample (#) – Depth below grade sample collected					

Boring locations are illustrated on Figure 3, Boring Location Map.

3.2.3 Soil Sampling and Analysis

Selected “grab” soil samples (of approximate 6” intervals) were collected in laboratory-provided sample containers. Each sample was labeled/logged onto a chain-of-custody form, and placed in a cooler with ice for preservation in accordance with current Federal EPA SW-846 (3rd ed.). The samples were submitted to an independent qualified laboratory (SGS Laboratories) for analyses. The samples were analyzed for the target analytes noted in Table 3.2.3.

To ensure that no cross-contamination between samples occurred, all non-dedicated sampling equipment was decontaminated after the collection of each sample using a cleaning detergent. Sampling equipment was scrubbed with a brush to remove loose material. Dedicated sampling equipment such as sampling liners and latex gloves were properly disposed of after the handling of each sample was complete. Samples were then collected using clean disposable gloves and laboratory-provided glassware appropriate for the specified analysis.

3.2.4 Abandonment of Borings

Upon completion of the soil sampling activities, each soil boring was filled surrounding soil and compacted.

4.0 PRESENTATION OF EVALUATION AND RESULTS

4.1 SOIL ANALYSIS RESULTS

The samples were analyzed for the target analytes noted in Table 3.2.3. The following table presents only the contaminants identified above the laboratory method detection limits:

Table 4.1		Soil Results						Legend:	Hit	Exceed
Results flagged as "Exceed" if any of the selected criteria exceeded (most stringent).										
Client Sample ID:		COMPOSITE B-1, B-2, B-3, B-4	COMPOSITE B-5, B-6, B-7, B-8	COMPOSITE B-9, B-10, B-11, B-12	DUPLICATE COMPOSITE B-9, B-10, B-11, B-12	COMPOSITE B-13, B-14, B-15, B-16	COMPOSITE B-17, B-18, B-19, B-20	DTSC-SLs Residential	RWQCB ESLs Residential	
Date Sampled:		2/24/2022	2/24/2022	2/24/2022	2/24/2022	2/24/2022	2/24/2022			
Matrix:		Soil	Soil	Soil	Soil	Soil	Soil			
Organochlorine Pesticides (OCPs)										
Dieldrin	mg/kg	ND (0.00047)	0.00066]	0.0010]	ND (0.00046)	ND (0.00046)	ND (0.00047)	0.034	0.037	
4,4'-DDE	mg/kg	0.0159	0.013	0.0279	0.0185	0.0086	0.0144	2	1.8	
4,4'-DDT	mg/kg	0.0026]	0.00087]	0.00066]	ND (0.00051)	ND (0.00050)	0.0012]	1.9	1.9	
Metals										
Arsenic	mg/kg	2.8 ^a	3.9 ^a	2.7 ^a	2.7 ^a	2.7 ^a	2.7 ^a	0.11	0.067	

Notes: All results are shown in milligrams per kilogram (mg/kg)

ND = Non-detect

a = Sample dilution required due to difficult matrix.

DTSC-SLs = California Department of Toxic Substances Control (DTSC) Modified Screening Levels, HERO HHRA Note Number 3 - June 2020

ESLs = California Regional Water Quality Control Board (RWQCB), San Francisco Bay Area Region, Tier I Environmental Screening Levels (ESLs) for Soil, 2019 (Rev 2)

mg/kg = Milligrams per kilogram

The soil sample results of analyses indicated that no chemicals were detected at concentrations greater than the laboratory method detection limits except for dieldrin, 4,4'-DDE, 4,4'-DDT, and arsenic. Only arsenic was detected at concentrations greater than the corresponding California Department of Toxic Substances Control (DTSC) Modified Screening Levels (SLs) and San Francisco Bay Regional Water Quality Control Board (RWQCB) Environmental Screening Levels (ESL) for residential land uses.

Please note that arsenic is commonly found in California soils at concentrations greater than the corresponding regulatory screening levels. For example, an arsenic study conducted by members of the DTSC on 19 proposed school sites in five southern California counties (Los Angeles, Orange, Riverside, San Bernardino, and San Diego counties), titled *Determination of a Southern California Regional Background Arsenic Concentration in Soil*, identified a probability plot for background arsenic concentrations that indicates an upper-bound concentration of naturally occurring arsenic of 12 mg/kg. Based on this information, the arsenic concentrations detected in the samples collected during this Phase II ESA appear to be within the range of expected background concentrations.

Laboratory soil analytical results and complete laboratory data sheets and chain-of-custody documentation are presented in Appendix C.

5.0 FINDINGS & CONCLUSIONS

We have performed a Phase II ESA at the property located at NWC of South Euclid Avenue & Schaefer Avenue, Chino, California in general conformance with the scope and limitations of ASTM E1903-11 and for the following objectives:

- The primary objective of this Phase II ESA was to evaluate potential impact to the Subject Property from the REC identified in the Phase I ESA prepared by EBI (February 3, 2022) for the purpose of providing sufficient information regarding the nature and potential extent of contamination to assist in making informed business decisions about the property; and where applicable, providing the level of knowledge necessary to satisfy the innocent purchaser defense under CERCLA. Review of the California Department of Toxic Substances Control's (DTSC's) August 7, 2008 document entitled *Interim Guidance for Sampling Agricultural Properties (Third Revision)* indicates the following:

- 1) In general, the COPCs at agricultural sites in California are OCPs, such as DDT, toxaphene, and dieldrin; and arsenic.

According to the DTSC (2008), OCPs were first introduced into California agriculture in 1944 and reached peak usage in the 1960s. In addition, arsenic in the form of arsenical herbicides has been applied to many agricultural properties and elevated levels of arsenic have been reported in the evaluation of these properties.

- 2) The subsurface impacts, if present, are generally limited to near surface soil (to evaluate whether impacts related to historical land uses are present at a property, the guidance recommends collecting soil samples for laboratory chemical analysis at depths between the ground surface and 6 inches bgs).

Based on the information noted above, the focus of the Phase II ESA conducted by EBA were the near surface soils beneath the Subject Property. The scope was conducted in accordance with DTSC's (2008) *Interim Guidance for Sampling Agricultural Properties*. Please note that in that document the DTSC presumes that agricultural chemicals were historically applied uniformly across a site in any given year and that the variation across a site will be relatively small. Thus, to achieve the objectives of this investigation, EBI performed the following tasks on February 24, 2022:

- 1) Collected a total of 20 discrete surface soil samples in a grid pattern across the Subject Property and described the physical characteristics of the soil samples on boring logs. The samples were collected using hand tools.
- 2) From the 20 discrete surface samples collected, a total of five composite samples were formed by laboratory compositing and analyzed for OCPs by EPA Method 8081. The composite surface samples were comprised of four (4) discrete surface soil samples from adjacent sampling locations. In addition, one discrete sample from each of the five composite samples was analyzed by the laboratory for total arsenic by EPA Method 6010. One field duplicate sample was also collected and analyzed for OCPs and total arsenic.

Validation of the Conceptual Model

It is EBI's opinion that the findings and results of this Phase II ESA investigation are consistent with and support the assumptions of the Conceptual Model presented in Section 3.1.1. Sufficient investigation has been demonstrated to support sound conclusions regarding the presence of the target analytes.

Findings

The findings of the Phase II ESA indicated the following:

- 1) The near surface soils encountered during the Phase II ESA were described as silt with varying amounts of gravel.
- 2) The soil sample results of analyses indicated that no chemicals were detected at concentrations greater than the laboratory method detection limits except for dieldrin, 4,4'-DDE, 4,4'-DDT, and arsenic. Only arsenic was detected at concentrations greater than the corresponding DTSC-SLs and ESL for residential land uses.

Conclusions

Based on the findings of the Phase II ESA, EBI concludes that significant subsurface impacts related to the historical on-site agricultural land uses were not identified during this investigation based on the following:

- 1) OCPs were not detected at concentrations exceeding the corresponding regulatory screening levels for residential land uses. As noted above, according to the DTSC (2008), agricultural chemicals were historically applied uniformly across a site in any given year and that the variation across a site will be relatively small.
- 2) The detected arsenic concentrations appear to be within the range of expected background concentrations. Arsenic was detected in the soil samples collected during this investigation at concentrations ranging from 2.7 to 3.9 mg/kg. A study conducted by DTSC in southern California ended up with an upper-bound concentration of naturally occurring arsenic of 12 mg/kg.

6.0 RECOMMENDATIONS

Based on the findings and conclusions of this Phase II ESA, EBI has no recommendations for additional investigations at this time.

DRAFT

APPENDIX A
FIGURES

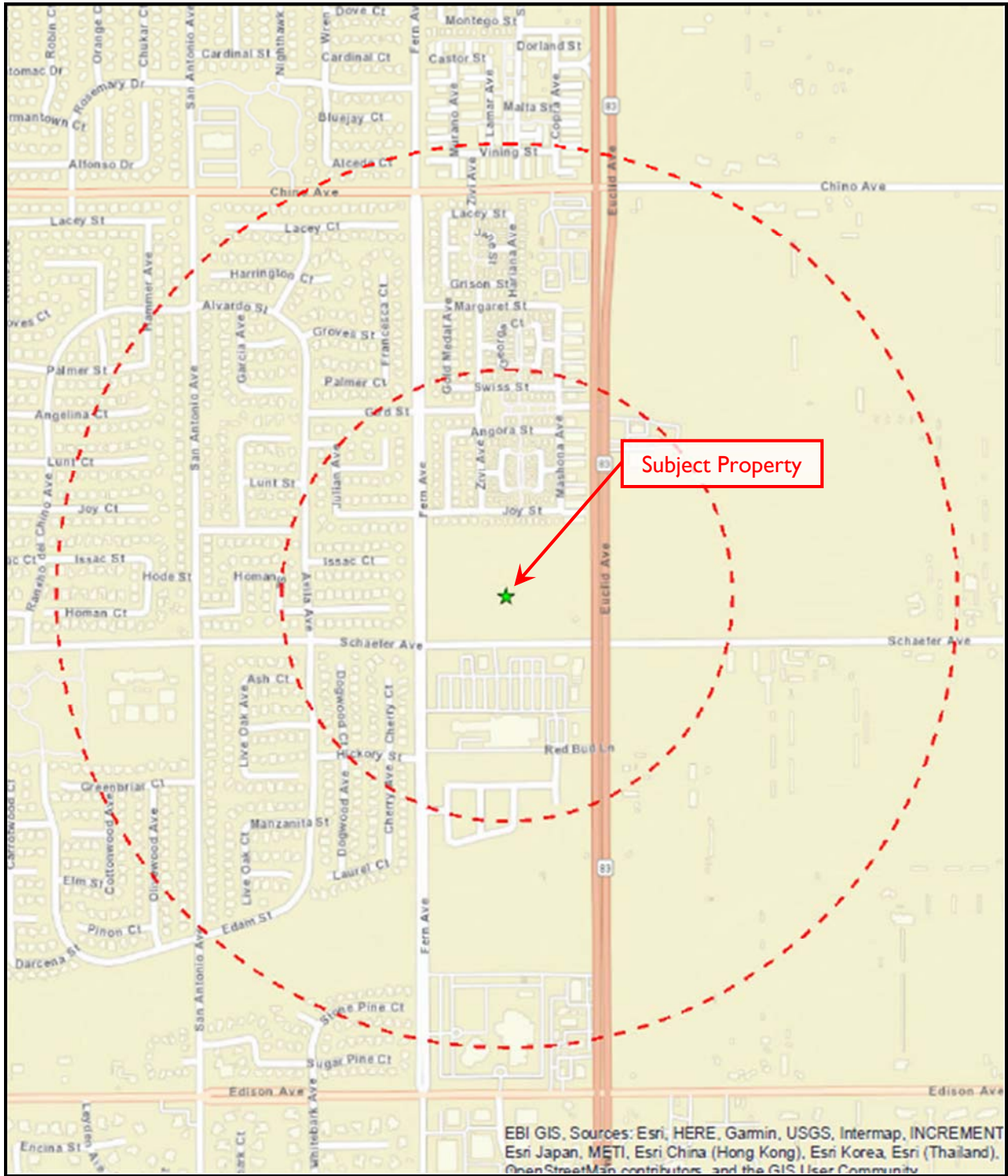


FIGURE I – SITE LOCATION MAP



Not to scale

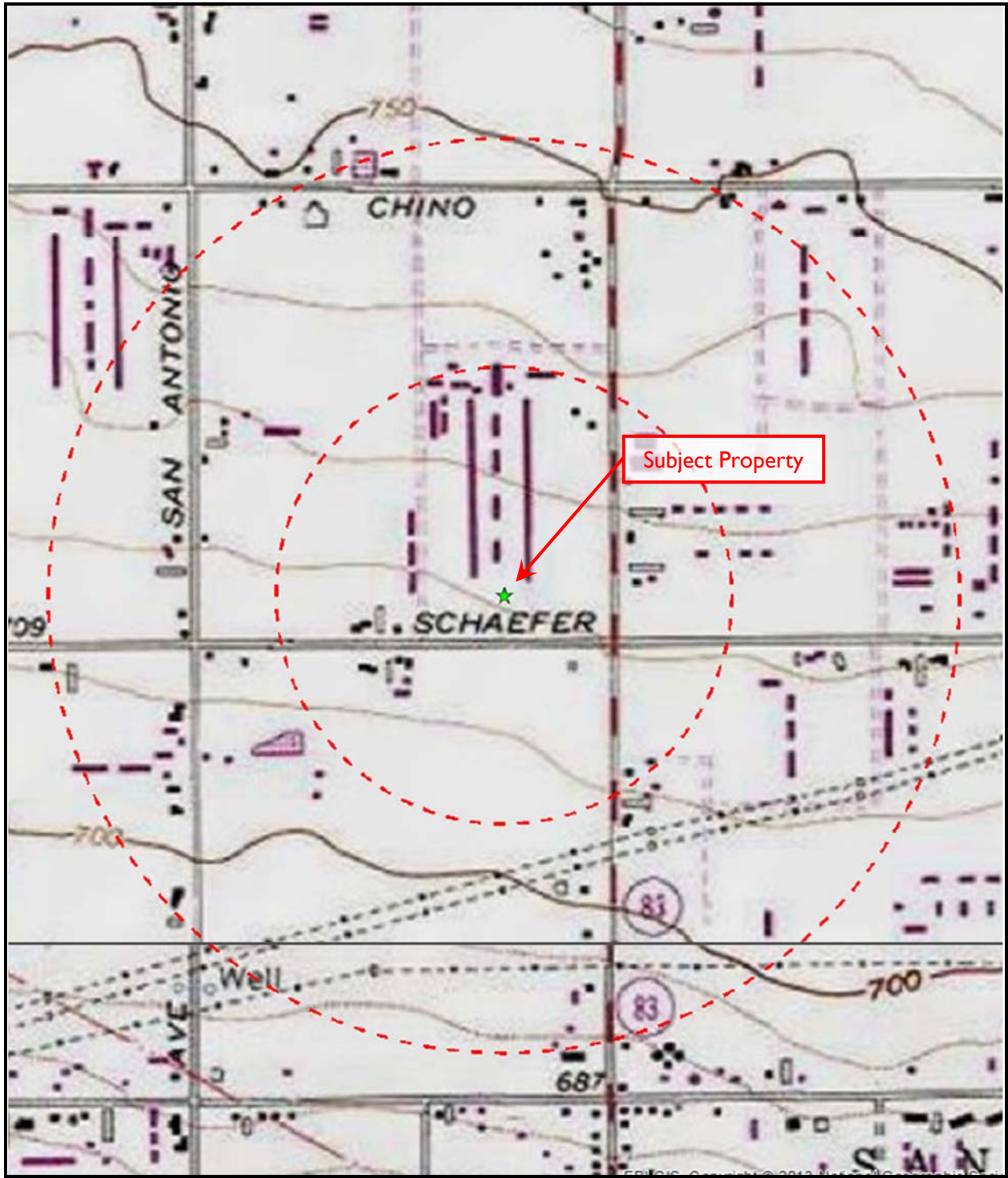


FIGURE 2 – TOPOGRAPHIC MAP



Not to scale

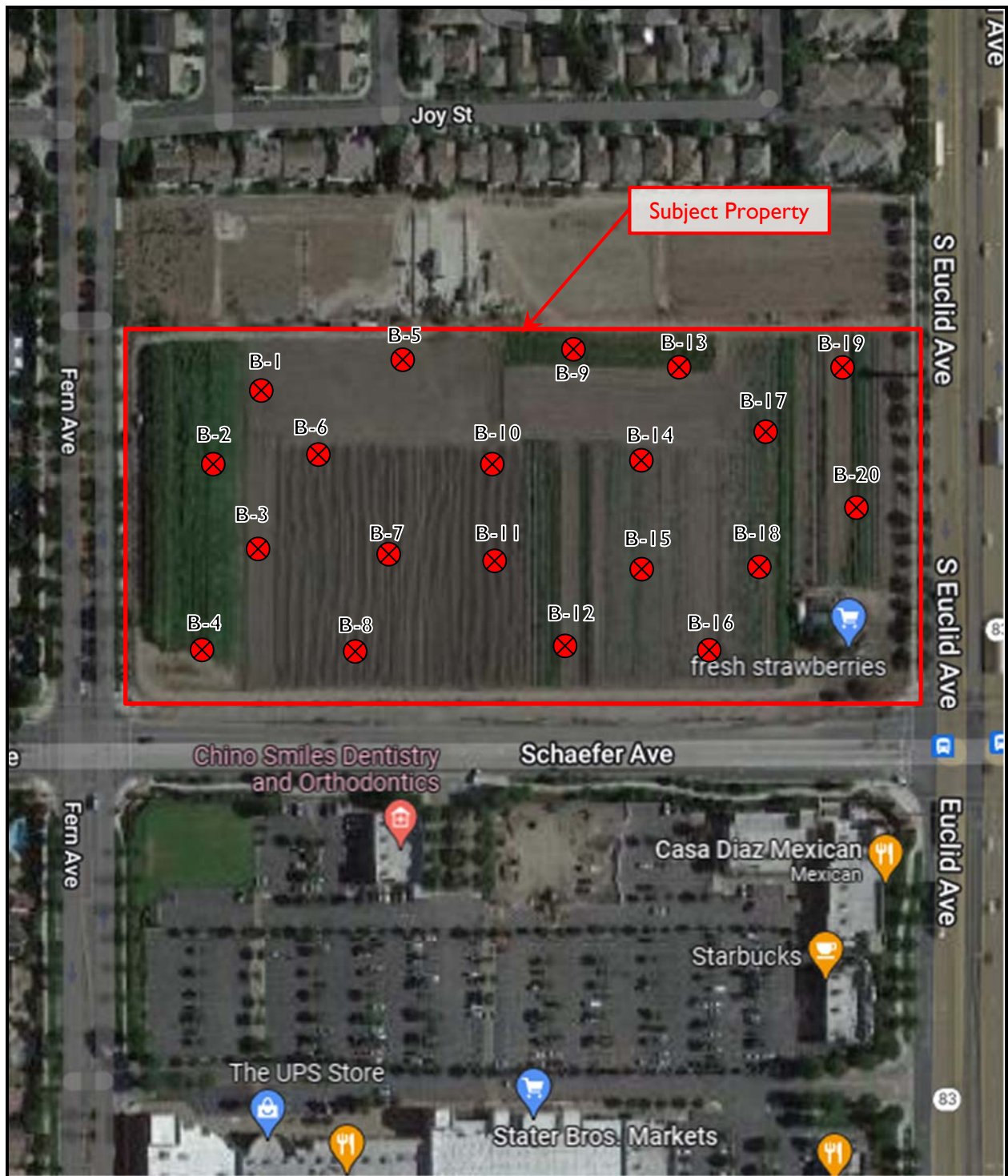


FIGURE 3 – BORING LOCATION MAP

⊗ SAMPLE LOCATION



Not to scale

APPENDIX B
BORING LOGS

SOIL BORING LOG - FIELD READINGS**EBI Project No. 1222000067****Project Name: Vacant Land – Euclid Schaefer Parcel****BORING METHOD: Shovel DATE: 2/24/2022**

Sample #	Depth (Ft)	Moisture (Saturated – Moist - Dry)	Soil Description/Notes
B-1	0.5	D	Light brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-2	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-3	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-4	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-5	0.5	D	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-6	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-7	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-8	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-9	0.5	D	Light brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-10	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-11	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-12	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-13	0.5	D	Light brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-14	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-15	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-16	0.5	M	Dark brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-17	0.5	M	Dark brown silt with trace fine sand and fine gravel.

SOIL BORING LOG - FIELD READINGS

EBI Project No. 1222000067

Project Name: Vacant Land – Euclid Schaefer Parcel

BORING METHOD: Shovel DATE: 2/24/2022

Sample #	Depth (Ft)	Moisture (Saturated – Moist - Dry)	Soil Description/Notes
B-18	0.5	M	Light brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-19	0.5	M	Light brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			
B-20	0.5	M	Light brown silt with trace fine sand and fine gravel.
Bottom of Boring at 0.5' (Termination depth), no groundwater encountered			

APPENDIX C
LABORATORY ANALYTICAL RESULTS

The results set forth herein are provided by SGS North America Inc.

e-Hardcopy 2.0
Automated Report

Technical Report for

EBI Consulting

1222000067 Chino, CA Phase 2

SGS Job Number: FA93428

Sampling Date: 02/24/22

Report to:

EBI Consulting
21 B St
Burlington, MA 01803
sclorety@ebiconsulting.com; cbechtel@ebiconsulting.com;
bbardsley@ebiconsulting.com; lruiz@ebiconsulting.com
ATTN: Stephanie Clorety

Total number of pages in report: 32



Test results contained within this data package meet the requirements of the National Environmental Laboratory Accreditation Program and/or state specific certification programs as applicable.

Norm Farmer
Technical Director

Client Service contact: Elvin Kumar 407-425-6700

Certifications: FL(E83510), LA(03051), KS(E-10327), NC(573), NJ(FL002), NY(12022), SC(96038001)
DoD ELAP(ANAB L2229), AZ(AZ0806), CA(2937), TX(T104704404), PA(68-03573), VA(460177),
AL, AK, AR, CT, IA, KY, MA, MI, MS, ND, NH, NV, OK, OR, IL, UT, VT, WA, WI, WV

This report shall not be reproduced, except in its entirety, without the written approval of SGS.
Test results relate only to samples analyzed.

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3

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6



Sample Summary

EBI Consulting

Job No: FA93428

1222000067 Chino, CA Phase 2

Sample Number	Collected Date	Time By	Received	Matrix Code	Type	Client Sample ID
---------------	----------------	---------	----------	-------------	------	------------------

This report contains results reported as ND = Not detected. The following applies:
 Organics ND = Not detected above the MDL

FA93428-1	02/24/22	09:15 LR	02/25/22	SO	Soil	COMPOSITE B-1, B-2, B-3, B-4
FA93428-2	02/24/22	10:15 LR	02/25/22	SO	Soil	COMPOSITE B-5, B-6, B-7, B-8
FA93428-3	02/24/22	10:55 LR	02/25/22	SO	Soil	COMPOSITE B-9, B-10, B-11, B-12
FA93428-4	02/24/22	10:55 LR	02/25/22	SO	Soil	DUPLICATE COMPOSITE B-9, B-10, B-11, B-12
FA93428-5	02/24/22	11:25 LR	02/25/22	SO	Soil	COMPOSITE B-13, B-14, B-15, B-16
FA93428-6	02/24/22	11:50 LR	02/25/22	SO	Soil	COMPOSITE B-17, B-18, B-19, B-20

Soil samples reported on a dry weight basis unless otherwise indicated on result page.

Summary of Hits

Job Number: FA93428
Account: EBI Consulting
Project: 1222000067 Chino, CA Phase 2
Collected: 02/24/22

Lab Sample ID	Client Sample ID	Result/ Qual	RL	MDL	Units	Method
FA93428-1	COMPOSITE B-1, B-2, B-3, B-4					
4,4' -DDE ^a		0.0159	0.0034	0.00061	mg/kg	SW846 8081B
4,4' -DDT ^a		0.0026 J	0.0034	0.00051	mg/kg	SW846 8081B
Arsenic ^b		2.8	2.1		mg/kg	SW846 6010D
FA93428-2	COMPOSITE B-5, B-6, B-7, B-8					
Dieldrin ^a		0.00066 J	0.0016	0.00045	mg/kg	SW846 8081B
4,4' -DDE ^a		0.0130	0.0032	0.00059	mg/kg	SW846 8081B
4,4' -DDT ^a		0.00087 J	0.0032	0.00050	mg/kg	SW846 8081B
Arsenic ^b		3.9	2.3		mg/kg	SW846 6010D
FA93428-3	COMPOSITE B-9, B-10, B-11, B-12					
Dieldrin ^a		0.0010 J	0.0016	0.00046	mg/kg	SW846 8081B
4,4' -DDE ^a		0.0279	0.0033	0.00060	mg/kg	SW846 8081B
4,4' -DDT ^a		0.00066 J	0.0033	0.00050	mg/kg	SW846 8081B
Arsenic ^b		2.7	1.9		mg/kg	SW846 6010D
FA93428-4	DUPLICATE COMPOSITE B-9, B-10, B-11, B-12					
4,4' -DDE ^a		0.0185	0.0033	0.00060	mg/kg	SW846 8081B
Arsenic ^b		2.7	2.1		mg/kg	SW846 6010D
FA93428-5	COMPOSITE B-13, B-14, B-15, B-16					
4,4' -DDE ^a		0.0086	0.0033	0.00059	mg/kg	SW846 8081B
Arsenic ^b		2.7	2.0		mg/kg	SW846 6010D
FA93428-6	COMPOSITE B-17, B-18, B-19, B-20					
4,4' -DDE ^a		0.0144	0.0034	0.00061	mg/kg	SW846 8081B
4,4' -DDT ^a		0.0012 J	0.0034	0.00052	mg/kg	SW846 8081B
Arsenic ^b		2.7	2.5		mg/kg	SW846 6010D

(a) All hits confirmed by dual column analysis.
(b) Sample dilution required due to difficult matrix.

Sample Results

Report of Analysis

Report of Analysis

Client Sample ID:	COMPOSITE B-1, B-2, B-3, B-4	Date Sampled:	02/24/22
Lab Sample ID:	FA93428-1	Date Received:	02/25/22
Matrix:	SO - Soil	Percent Solids:	n/a ^a
Project:	1222000067 Chino, CA Phase 2		

Metals Analysis

Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method
Arsenic ^b	2.8	2.1	mg/kg	5	02/28/22	03/01/22 LM	SW846 6010D ¹	SW846 3050B ²

(1) Instrument QC Batch: MA18494

(2) Prep QC Batch: MP40354

(a) All results reported on a wet weight basis.

(b) Sample dilution required due to difficult matrix.

RL = Reporting Limit

Report of Analysis

Client Sample ID:	COMPOSITE B-5, B-6, B-7, B-8	Date Sampled:	02/24/22
Lab Sample ID:	FA93428-2	Date Received:	02/25/22
Matrix:	SO - Soil	Percent Solids:	n/a ^a
Project:	1222000067 Chino, CA Phase 2		

Metals Analysis

Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method
Arsenic ^b	3.9	2.3	mg/kg	5	02/28/22	03/01/22 LM	SW846 6010D ¹	SW846 3050B ²

(1) Instrument QC Batch: MA18494

(2) Prep QC Batch: MP40354

(a) All results reported on a wet weight basis.

(b) Sample dilution required due to difficult matrix.

RL = Reporting Limit

Report of Analysis

Client Sample ID: COMPOSITE B-9, B-10, B-11, B-12 Lab Sample ID: FA93428-3 Matrix: SO - Soil Project: 1222000067 Chino, CA Phase 2	Date Sampled: 02/24/22 Date Received: 02/25/22 Percent Solids: n/a ^a
---	--

Metals Analysis

Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method
Arsenic ^b	2.7	1.9	mg/kg	5	02/28/22	03/01/22 LM	SW846 6010D ¹	SW846 3050B ²

(1) Instrument QC Batch: MA18494

(2) Prep QC Batch: MP40354

- (a) All results reported on a wet weight basis.
- (b) Sample dilution required due to difficult matrix.

RL = Reporting Limit

Report of Analysis

Client Sample ID:	DUPLICATE COMPOSITE B-9, B-10, B-11, B-12	
Lab Sample ID:	FA93428-4	Date Sampled: 02/24/22
Matrix:	SO - Soil	Date Received: 02/25/22
Project:	1222000067 Chino, CA Phase 2	Percent Solids: n/a ^a

Metals Analysis

Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method
Arsenic ^b	2.7	2.1	mg/kg	5	02/28/22	03/01/22 LM	SW846 6010D ¹	SW846 3050B ²

(1) Instrument QC Batch: MA18494

(2) Prep QC Batch: MP40354

(a) All results reported on a wet weight basis.

(b) Sample dilution required due to difficult matrix.

RL = Reporting Limit

Report of Analysis

Client Sample ID:	COMPOSITE B-13, B-14, B-15, B-16	Date Sampled:	02/24/22
Lab Sample ID:	FA93428-5	Date Received:	02/25/22
Matrix:	SO - Soil	Percent Solids:	n/a ^a
Project:	1222000067 Chino, CA Phase 2		

Metals Analysis

Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method
Arsenic ^b	2.7	2.0	mg/kg	5	02/28/22	03/01/22 LM	SW846 6010D ¹	SW846 3050B ²

(1) Instrument QC Batch: MA18494

(2) Prep QC Batch: MP40354

(a) All results reported on a wet weight basis.

(b) Sample dilution required due to difficult matrix.

RL = Reporting Limit

Report of Analysis

Client Sample ID:	COMPOSITE B-17, B-18, B-19, B-20	Date Sampled:	02/24/22
Lab Sample ID:	FA93428-6	Date Received:	02/25/22
Matrix:	SO - Soil	Percent Solids:	n/a ^a
Method:	SW846 8081B SW846 3546		
Project:	1222000067 Chino, CA Phase 2		

Run #	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
Run #1 ^b	TT404048.D	1	02/28/22 15:47	WH	02/26/22 08:00	OP89973	GTT2602
Run #2							

Run #	Initial Weight	Final Volume
Run #1	14.8 g	5.0 ml
Run #2		

Pesticide PPL List

CAS No.	Compound	Result	RL	MDL	Units	Q
309-00-2	Aldrin	ND	0.0017	0.00053	mg/kg	
319-84-6	alpha-BHC	ND	0.0017	0.00053	mg/kg	
319-85-7	beta-BHC	ND	0.0017	0.00050	mg/kg	
319-86-8	delta-BHC	ND	0.0017	0.00048	mg/kg	
58-89-9	gamma-BHC (Lindane)	ND	0.0017	0.00051	mg/kg	
12789-03-6	Chlordane	ND	0.017	0.0051	mg/kg	
60-57-1	Dieldrin	ND	0.0017	0.00047	mg/kg	
72-54-8	4,4' -DDD	ND	0.0034	0.00047	mg/kg	
72-55-9	4,4' -DDE	0.0144	0.0034	0.00061	mg/kg	
50-29-3	4,4' -DDT	0.0012	0.0034	0.00052	mg/kg	J
72-20-8	Endrin	ND	0.0034	0.00085	mg/kg	
1031-07-8	Endosulfan sulfate	ND	0.0034	0.00045	mg/kg	
7421-93-4	Endrin aldehyde	ND	0.0034	0.00039	mg/kg	
959-98-8	Endosulfan-I	ND	0.0017	0.00039	mg/kg	
33213-65-9	Endosulfan-II	ND	0.0017	0.00040	mg/kg	
76-44-8	Heptachlor	ND	0.0017	0.00050	mg/kg	
1024-57-3	Heptachlor epoxide	ND	0.0017	0.00050	mg/kg	
72-43-5	Methoxychlor	ND	0.0034	0.00068	mg/kg	
8001-35-2	Toxaphene	ND	0.084	0.025	mg/kg	

CAS No.	Surrogate Recoveries	Run# 1	Run# 2	Limits
877-09-8	Tetrachloro-m-xylene	63%		50-122%
2051-24-3	Decachlorobiphenyl	64%		50-133%

- (a) All results reported on a wet weight basis.
- (b) All hits confirmed by dual column analysis.

ND = Not detected MDL = Method Detection Limit J = Indicates an estimated value
 RL = Reporting Limit B = Indicates analyte found in associated method blank
 E = Indicates value exceeds calibration range N = Indicates presumptive evidence of a compound

Report of Analysis

Client Sample ID:	COMPOSITE B-17, B-18, B-19, B-20	Date Sampled:	02/24/22
Lab Sample ID:	FA93428-6	Date Received:	02/25/22
Matrix:	SO - Soil	Percent Solids:	n/a ^a
Project:	1222000067 Chino, CA Phase 2		

Metals Analysis

Analyte	Result	RL	Units	DF	Prep	Analyzed By	Method	Prep Method
Arsenic ^b	2.7	2.5	mg/kg	5	02/28/22	03/01/22 LM	SW846 6010D ¹	SW846 3050B ²

(1) Instrument QC Batch: MA18494

(2) Prep QC Batch: MP40354

(a) All results reported on a wet weight basis.

(b) Sample dilution required due to difficult matrix.

RL = Reporting Limit

Misc. Forms

Custody Documents and Other Forms

Includes the following where applicable:

- Chain of Custody

SGS Sample Receipt Summary

Job Number: FA93428

Client: EBI CONSULTING

Project: 1222000067 Chino, CA Phase 2

Date / Time Received: 2/25/2022 10:30:00 AM

Delivery Method: FedEx

Airbill #'s: 791235219085

Therm ID: IR 1;

Therm CF: 0.4;

of Coolers: 1

Cooler Temps (Raw Measured) °C: Cooler 1: (2.0);

Cooler Temps (Corrected) °C: Cooler 1: (2.4);

Cooler Information

Y or N

- 1. Custody Seals Present
- 2. Custody Seals Intact
- 3. Temp criteria achieved
- 4. Cooler temp verification IR Gun
- 5. Cooler media Ice (Bag)

Trip Blank Information

Y or N N/A

- 1. Trip Blank present / cooler
 - 2. Trip Blank listed on COC
- W or S N/A
- 3. Type Of TB Received

Sample Information

Y or N N/A

- 1. Sample labels present on bottles
- 2. Samples preserved properly
- 3. Sufficient volume/containers recvd for analysis:
- 4. Condition of sample Intact
- 5. Sample recvd within HT
- 6. Dates/Times/IDs on COC match Sample Label
- 7. VOCs have headspace
- 8. Bottles received for unspecified tests
- 9. Compositing instructions clear
- 10. Voa Soil Kits/Jars received past 48hrs?
- 11. % Solids Jar received?
- 12. Residual Chlorine Present?

Misc. Information

Number of Encores: 25-Gram _____ 5-Gram _____ Number of 5035 Field Kits: _____ Number of Lab Filtered Metals: _____
 Test Strip Lot #: pH 0-3 230315 pH 10-12 219813A Other: (Specify) _____
 Residual Chlorine Test Strip Lot #: _____

Comments

SM001
Rev. Date 05/24/17

Technician: CARLOSD

Date: 2/25/2022 10:30:00 A

Reviewer: CD

Date: 2/28/2022

FA93428: Chain of Custody

Page 2 of 2

4.1
4

GC/LC Semi-volatiles

QC Data Summaries

Includes the following where applicable:

- Method Blank Summaries
- Blank Spike Summaries
- Matrix Spike and Duplicate Summaries

Method Blank Summary

Job Number: FA93428
Account: EBIMAB EBI Consulting
Project: 1222000067 Chino, CA Phase 2

Sample	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
OP89973-MB	TT404042.D	1	02/28/22	WH	02/26/22	OP89973	GTT2602

The QC reported here applies to the following samples:

Method: SW846 8081B

FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

CAS No.	Compound	Result	RL	MDL	Units	Q
309-00-2	Aldrin	ND	1.7	0.53	ug/kg	
319-84-6	alpha-BHC	ND	1.7	0.53	ug/kg	
319-85-7	beta-BHC	ND	1.7	0.49	ug/kg	
319-86-8	delta-BHC	ND	1.7	0.47	ug/kg	
58-89-9	gamma-BHC (Lindane)	ND	1.7	0.50	ug/kg	
12789-03-6	Chlordane	ND	17	5.1	ug/kg	
60-57-1	Dieldrin	ND	1.7	0.47	ug/kg	
72-54-8	4,4' -DDD	ND	3.3	0.46	ug/kg	
72-55-9	4,4' -DDE	ND	3.3	0.61	ug/kg	
50-29-3	4,4' -DDT	ND	3.3	0.51	ug/kg	
72-20-8	Endrin	ND	3.3	0.84	ug/kg	
1031-07-8	Endosulfan sulfate	ND	3.3	0.44	ug/kg	
7421-93-4	Endrin aldehyde	ND	3.3	0.39	ug/kg	
959-98-8	Endosulfan-I	ND	1.7	0.38	ug/kg	
33213-65-9	Endosulfan-II	ND	1.7	0.39	ug/kg	
76-44-8	Heptachlor	ND	1.7	0.49	ug/kg	
1024-57-3	Heptachlor epoxide	ND	1.7	0.49	ug/kg	
72-43-5	Methoxychlor	ND	3.3	0.67	ug/kg	
8001-35-2	Toxaphene	ND	83	25	ug/kg	

CAS No.	Surrogate Recoveries	Limits	
877-09-8	Tetrachloro-m-xylene	81%	50-122%
2051-24-3	Decachlorobiphenyl	87%	50-133%

5.1.1
5

Blank Spike Summary

Job Number: FA93428
Account: EBIMAB EBI Consulting
Project: 1222000067 Chino, CA Phase 2

Sample	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
OP89973-BS	TT404040.D	1	02/28/22	WH	02/26/22	OP89973	GTT2602

The QC reported here applies to the following samples:

Method: SW846 8081B

FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

CAS No.	Compound	Spike ug/kg	BSP ug/kg	BSP %	Limits
309-00-2	Aldrin	16.7	12.5	75	57-120
319-84-6	alpha-BHC	16.7	13.1	79	60-117
319-85-7	beta-BHC	16.7	14.4	86	57-125
319-86-8	delta-BHC	16.7	15.2	91	42-126
58-89-9	gamma-BHC (Lindane)	16.7	12.9	77	60-123
60-57-1	Dieldrin	16.7	12.9	77	63-125
72-54-8	4,4'-DDD	16.7	13.1	79	55-135
72-55-9	4,4'-DDE	16.7	12.9	77	61-129
50-29-3	4,4'-DDT	16.7	15.1	91	60-136
72-20-8	Endrin	16.7	13.3	80	67-138
1031-07-8	Endosulfan sulfate	16.7	14.9	89	59-119
7421-93-4	Endrin aldehyde	16.7	13.2	79	37-110
959-98-8	Endosulfan-I	16.7	12.0	72	62-122
33213-65-9	Endosulfan-II	16.7	13.2	79	62-122
76-44-8	Heptachlor	16.7	13.1	79	58-123
1024-57-3	Heptachlor epoxide	16.7	12.8	77	60-122
72-43-5	Methoxychlor	16.7	15.2	91	57-133

CAS No.	Surrogate Recoveries	BSP	Limits
877-09-8	Tetrachloro-m-xylene	78%	50-122%
2051-24-3	Decachlorobiphenyl	83%	50-133%

* = Outside of Control Limits.

Blank Spike Summary

Job Number: FA93428
Account: EBIMAB EBI Consulting
Project: 1222000067 Chino, CA Phase 2

Sample	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
OP89973-BS2	TT404041.D	1	02/28/22	WH	02/26/22	OP89973	GTT2602

The QC reported here applies to the following samples:

Method: SW846 8081B

FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

CAS No.	Compound	Spike ug/kg	BSP ug/kg	BSP %	Limits
12789-03-6	Chlordane	83.3	76.1	91	52-146
8001-35-2	Toxaphene	167	147	88	48-155

CAS No.	Surrogate Recoveries	BSP	Limits
877-09-8	Tetrachloro-m-xylene	81%	50-122%
2051-24-3	Decachlorobiphenyl	86%	50-133%

* = Outside of Control Limits.

Matrix Spike/Matrix Spike Duplicate Summary

Job Number: FA93428
Account: EBIMAB EBI Consulting
Project: 1222000067 Chino, CA Phase 2

Sample	File ID	DF	Analyzed	By	Prep Date	Prep Batch	Analytical Batch
OP89973-MS	TT404049.D	1	02/28/22	WH	02/26/22	OP89973	GTT2602
OP89973-MSD	TT404050.D	1	02/28/22	WH	02/26/22	OP89973	GTT2602
FA93428-1 ^a	TT404043.D	1	02/28/22	WH	02/26/22	OP89973	GTT2602

The QC reported here applies to the following samples:

Method: SW846 8081B

FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

CAS No.	Compound	FA93428-1 ug/kg	Spike Q ug/kg	MS ug/kg	MS %	Spike ug/kg	MSD ug/kg	MSD %	RPD	Limits Rec/RPD
309-00-2	Aldrin	ND	16.4	12.3	75	16.8	11.8	70	4	57-120/28
319-84-6	alpha-BHC	ND	16.4	12.9	78	16.8	12.3	73	5	60-117/24
319-85-7	beta-BHC	ND	16.4	14.3	87	16.8	13.8	82	4	57-125/26
319-86-8	delta-BHC	ND	16.4	14.7	89	16.8	14.3	85	3	42-126/24
58-89-9	gamma-BHC (Lindane)	ND	16.4	12.8	78	16.8	12.2	73	5	60-123/29
60-57-1	Dieldrin	ND	16.4	12.9	78	16.8	12.3	73	5	63-125/29
72-54-8	4,4'-DDD	ND	16.4	12.9	78	16.8	12.2	73	6	55-135/31
72-55-9	4,4'-DDE	15.9	16.4	27.7	72	16.8	27.7	70	0	61-129/31
50-29-3	4,4'-DDT	2.6	J 16.4	15.5	78	16.8	14.5	71	7	60-136/39
72-20-8	Endrin	ND	16.4	12.8	78	16.8	12.2	73	5	67-138/28
1031-07-8	Endosulfan sulfate	ND	16.4	14.1	86	16.8	13.6	81	4	59-119/28
7421-93-4	Endrin aldehyde	ND	16.4	11.6	71	16.8	11.9	71	3	37-110/25
959-98-8	Endosulfan-I	ND	16.4	11.7	71	16.8	11.1	66	5	62-122/29
33213-65-9	Endosulfan-II	ND	16.4	13.2	80	16.8	12.4	74	6	62-122/31
76-44-8	Heptachlor	ND	16.4	12.5	76	16.8	12.1	72	3	58-123/30
1024-57-3	Heptachlor epoxide	ND	16.4	12.9	78	16.8	12.3	73	5	60-122/33
72-43-5	Methoxychlor	ND	16.4	14.3	87	16.8	13.5	80	6	57-133/31

CAS No.	Surrogate Recoveries	MS	MSD	FA93428-1	Limits
877-09-8	Tetrachloro-m-xylene	79%	71%	80%	50-122%
2051-24-3	Decachlorobiphenyl	78%	70%	77%	50-133%

(a) All hits confirmed by dual column analysis.

* = Outside of Control Limits.

5.3.1
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Metals Analysis

QC Data Summaries

Includes the following where applicable:

- Method Blank Summaries
- Matrix Spike and Duplicate Summaries
- Blank Spike and Lab Control Sample Summaries
- Serial Dilution Summaries

BLANK RESULTS SUMMARY
Part 2 - Method Blanks

Login Number: FA93428
Account: EBIMAB - EBI Consulting
Project: 1222000067 Chino, CA Phase 2

QC Batch ID: MP40354
Matrix Type: SOLID

Methods: SW846 6010D
Units: mg/kg

Prep Date: 02/28/22

Metal	RL	IDL	MDL	MB raw	final
Aluminum	10	.7	1.8		
Antimony	1.0	.05	.065		
Arsenic	0.50	.065	.1	0.0050	<0.50
Barium	10	.025	.05		
Beryllium	0.25	.005	.025		
Cadmium	0.20	.005	.025		
Calcium	250	2.5	2.5		
Chromium	0.50	.025	.05		
Cobalt	2.5	.01	.025		
Copper	1.3	.05	.05		
Iron	15	.75	.85		
Lead	1.0	.05	.05		
Magnesium	250	1.8	1.8		
Manganese	0.75	.013	.025		
Molybdenum	2.5	.015	.025		
Nickel	2.0	.02	.025		
Potassium	500	5	10		
Selenium	1.0	.1	.12		
Silver	0.50	.025	.041		
Sodium	500	13	25		
Strontium	0.50	.013	.025		
Thallium	0.50	.05	.055		
Tin	2.5	.025	.045		
Titanium	0.50	.025	.025		
Vanadium	2.5	.025	.025		
Zinc	1.0	.15	.15		

Associated samples MP40354: FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

Results < IDL are shown as zero for calculation purposes
(*) Outside of QC limits
(anr) Analyte not requested

6.1.1
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MATRIX SPIKE AND DUPLICATE RESULTS SUMMARY

Login Number: FA93428
 Account: EBIMAB - EBI Consulting
 Project: 1222000067 Chino, CA Phase 2

QC Batch ID: MP40354
 Matrix Type: SOLID

Methods: SW846 6010D
 Units: mg/kg

Prep Date: 02/28/22 02/28/22

Metal	FA93403-8 Original DUP		RPD	QC Limits	FA93403-8 Original MS		Spikelot MPFLICP2	% Rec	QC Limits
Aluminum									
Antimony									
Arsenic	0.34	0.39	13.7	0-20	0.34	102	105	97.0	80-120
Barium									
Beryllium									
Cadmium									
Calcium									
Chromium									
Cobalt									
Copper									
Iron									
Lead									
Magnesium									
Manganese									
Molybdenum									
Nickel									
Potassium									
Selenium									
Silver									
Sodium									
Strontium									
Thallium									
Tin									
Titanium									
Vanadium									
Zinc									

Associated samples MP40354: FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

Results < IDL are shown as zero for calculation purposes
 (*) Outside of QC limits
 (N) Matrix Spike Rec. outside of QC limits
 (anr) Analyte not requested

MATRIX SPIKE AND DUPLICATE RESULTS SUMMARY

Login Number: FA93428
 Account: EBIMAB - EBI Consulting
 Project: 1222000067 Chino, CA Phase 2

QC Batch ID: MP40354
 Matrix Type: SOLID

Methods: SW846 6010D
 Units: mg/kg

Prep Date: 02/28/22

Metal	FA93403-8 Original MSD		SpikeLot MPFLICP2 % Rec		MSD RPD	QC Limit
Aluminum						
Antimony						
Arsenic	0.34	89.9	95.3	94.0	12.6	20
Barium						
Beryllium						
Cadmium						
Calcium						
Chromium						
Cobalt						
Copper						
Iron						
Lead						
Magnesium						
Manganese						
Molybdenum						
Nickel						
Potassium						
Selenium						
Silver						
Sodium						
Strontium						
Thallium						
Tin						
Titanium						
Vanadium						
Zinc						

Associated samples MP40354: FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

Results < IDL are shown as zero for calculation purposes
 (*) Outside of QC limits
 (N) Matrix Spike Rec. outside of QC limits
 (anr) Analyte not requested

SPIKE BLANK AND LAB CONTROL SAMPLE SUMMARY

Login Number: FA93428
 Account: EBIMAB - EBI Consulting
 Project: 1222000067 Chino, CA Phase 2

QC Batch ID: MP40354
 Matrix Type: SOLID

Methods: SW846 6010D
 Units: mg/kg

Prep Date: 02/28/22

Metal	BSP Result	Spikelot MPFLICP2	% Rec	QC Limits
Aluminum				
Antimony				
Arsenic	97.8	100	97.8	80-120
Barium				
Beryllium				
Cadmium				
Calcium				
Chromium				
Cobalt				
Copper				
Iron				
Lead				
Magnesium				
Manganese				
Molybdenum				
Nickel				
Potassium				
Selenium				
Silver				
Sodium				
Strontium				
Thallium				
Tin				
Titanium				
Vanadium				
Zinc				

Associated samples MP40354: FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

Results < IDL are shown as zero for calculation purposes
 (*) Outside of QC limits
 (anr) Analyte not requested

SERIAL DILUTION RESULTS SUMMARY

Login Number: FA93428
 Account: EBIMAB - EBI Consulting
 Project: 1222000067 Chino, CA Phase 2

QC Batch ID: MP40354
 Matrix Type: SOLID

Methods: SW846 6010D
 Units: ug/l

Prep Date: 02/28/22

Metal	FA93403-8 Original	SDL 1:5	%DIF	QC Limits
Aluminum				
Antimony				
Arsenic	7.10	11.3	59.2 (a)	0-10
Barium				
Beryllium				
Cadmium				
Calcium				
Chromium				
Cobalt				
Copper				
Iron				
Lead				
Magnesium				
Manganese				
Molybdenum				
Nickel				
Potassium				
Selenium				
Silver				
Sodium				
Strontium				
Thallium				
Tin				
Titanium				
Vanadium				
Zinc				

Associated samples MP40354: FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

Results < IDL are shown as zero for calculation purposes

(*) Outside of QC limits

(anr) Analyte not requested

(a) Percent difference acceptable due to low initial sample concentration (< 50 times IDL).

POST DIGESTATE SPIKE SUMMARY

Login Number: FA93428
 Account: EBIMAB - EBI Consulting
 Project: 1222000067 Chino, CA Phase 2

QC Batch ID: MP40354
 Matrix Type: SOLID

Methods: SW846 6010D
 Units: ug/l

Prep Date:

02/28/22

Metal	Sample ml	Final ml	FA93403-8 Raw	PS Corr.** ug/l	Spike ml	Spike ug/ml	Spike ug/l	% Rec	QC Limits
Aluminum									
Antimony									
Arsenic	9.8	10	7.1	6.958	108.7	0.2	5	100	101.7 80-120
Barium									
Beryllium									
Cadmium									
Calcium									
Chromium									
Cobalt									
Copper									
Iron									
Lead									
Magnesium									
Manganese									
Molybdenum									
Nickel									
Potassium									
Selenium									
Silver									
Sodium									
Strontium									
Thallium									
Tin									
Titanium									
Vanadium									
Zinc									

Associated samples MP40354: FA93428-1, FA93428-2, FA93428-3, FA93428-4, FA93428-5, FA93428-6

Results < IDL are shown as zero for calculation purposes
 (*) Outside of QC limits
 (**) Corr. sample result = Raw * (sample volume / final volume)
 (anr) Analyte not requested

APPENDIX D
PROFESSIONAL QUALIFICATIONS

Summary of Experience

Ms. Lizette Ruiz is an EBI Project Scientist, with over seven years of experience in private sector environmental consulting and three years of experience in public sector environmental regulatory compliance. Environmental consulting experience includes conducting phase I Environmental Site Assessments, asbestos surveys, lead based paint surveys, visual mold inspections, naturally occurring radioactive materials (NORM) surveys, third party desk reviews, phase II subsurface investigations, indoor air quality surveys, groundwater well monitoring, geotechnical boring and water percolation tests, and preparing reports and corresponding project documents.

Relevant Project Experience

ASTM Phase I Environmental Site Assessments (ESAs): Conducted various Phase I ESAs for both private sector and municipal clients on residential, retail, commercial, industrial, airports, and warehouse properties throughout the United States. Included visual inspections of properties, sampling for potential lead based paint, radon, and presumed asbestos containing materials, comprehensive photographic logs, conducting interviews, review of historical records, regulatory agency research, and comprehensive written reports. Phase I ESAs were conducted in accordance with the American Society of Testing and Materials (ASTM) Standard Practices for Environmental Site Assessment requirements. As such, Ms. Ruiz meets the ASTM requirements of an Environmental Professional (EP).

Phase II Subsurface Investigations: Conducted various Phase II Subsurface Investigations to evaluate potential soil and/or groundwater contamination. Field activities performed include the collection of soil, soil vapor, and groundwater samples, measuring groundwater depth, preparing and submitting collected samples for laboratory analysis under the proper chain of custody, and preparing reports of findings.

Regulatory Work: Public Records Request Coordinator at the Los Angeles Regional Water Board (LARWQCB). As part of the US EPA 710 Corridor Initiative Project, reviewed over 50 backlogged Underground Storage Tank Leaking cases for closure recommendations while working at the City of Los Angeles Fire Department. Evaluated and arranged case closure packages for the LARWQCB and the Los Angeles County Department of Public Works.

Education

B.S. Environmental Science and Policy, Minor in Geology, California State University, Long Beach

Professional Registrations

OSHA 40-Hour Hazardous Materials Training
EPA AHERA Certified Building Inspector

SUMMARY OF EXPERIENCE

Stephanie Clorey, Project Manager Site Investigation and Remediation Group has extensive experience in environmental geology since 1999. Mrs. Clorey has completed site investigations and remedial actions including Phase I Environmental Site Assessments, Phase II subsurface investigations, Site Characterizations, UST removals, and landfill compliance sampling and monitoring, sewer outfall sampling, health and safety construction/demolition monitoring, remediation system observation and maintenance, drinking water sampling, and radon surveys.

Mrs. Clorey has conducted multiple site assessments and regulatory site closures for a wide range of properties throughout the United States, Canada and Aruba. These assessments have been performed to evaluate site conditions, potential off-site liabilities, environmental control systems, and site remediation costs in order to advise prospective buyers, current operators, and owners of potential and existing environmental concerns.

RELEVANT PROJECT EXPERIENCE

Conducted ASTM Phase I Environmental Site Assessments, Environmental Site Screenings, soil, groundwater, and leachate sampling, landfill gas monitoring and construction oversight for landfill caps. Completed subsurface investigation at property types ranging from commercial to residential. Task manager for multiple gasoline refineries and terminals for conducting or general oversight of the weekly, monthly, and quarterly gauging, bailing, sampling and observation and maintenance of remediation systems. In charge of the sewer outfall sampling for one of the petroleum refineries. I also completed subsurface investigation at various gasoline service stations across Maryland, Pennsylvania and Virginia. Task manager for multiple gasoline service stations for conducting or general oversight of the weekly, monthly, and quarterly gauging, bailing, sampling and observation and maintenance of remediation systems. Completed oversight of the UST removals at over 12 gasoline service stations across Maryland and Virginia.

Completed subsurface investigation at property types such as industrial, commercial, landfills, refineries and residential. The subsurface investigations included direct-push sampling, hollow stem auger and mud rotary drilling for the installation of monitoring wells and soil vapor points. Completed subsurface investigations and oversight of the UST removals at various properties across Maryland, Virginia, Pennsylvania, and West Virginia. Assisted in processing several commercial and former industrial properties through state's Voluntary Clean Up/Brownfield Programs and Pennsylvania's Act 2 Program. Completed construction oversight air monitoring and was the site health and safety officer during the monitoring events.

EDUCATION

Bachelor of Science, Environmental Geology, Ohio University

SUMMARY OF EXPERIENCE

Mr. Bardsley has over 20 years of experience in hazardous waste management, environmental engineering, and geology. He has experience as a project manager, task manager, and/or project geologist on numerous site assessments, hazardous waste investigations, industrial facility closures, and underground tank, and remediation projects.

Activities have included all aspects of preliminary site assessments and subsequent site investigations on properties with environmental contamination, hazardous waste investigations, industrial facility closures, and underground storage tanks (USTs) / aboveground storage tanks (ASTs), and remediation projects. Mr. Bardsley has also negotiated with and obtained closure from various regulatory agencies.

Mr. Bardsley has worked with corporate environmental officers, Wall Street lending institutions, legal counsels, investment companies, petroleum related clients and real estate brokers to develop strategies for managing environmental due diligence investigation for property acquisition and financing. Mr. Bardsley has also provided litigation support for different environmental projects; and on-call environmental compliance inspections on several Washington State Department of Transportation (WSDOT) roadway construction projects. He has participated in a variety of projects throughout the United States, but more specifically in the western United States including Alaska, Arizona, California, Colorado, Idaho, Montana, New Mexico, Nevada, Oregon, Texas, Utah, and Washington.

RELEVANT PROJECT EXPERIENCE

- Managed, conducted, and provided technical oversight for numerous phase I Environmental Site Assessments (ESAs) for sites throughout the western United States, as well as initial site assessments (ISAs) and hazardous substance liability assessments (HSLAs) for sites in California, in accordance with ASTM E 1527.
- Designed and conducted/managed numerous subsequent Phase II assessments. Examples include former and existing dry cleaning facilities, aerospace engineering facilities, electrical manufacturing facilities, former and current automobile dealerships and/or repair shops, former and current aggregate mining sites, former shooting ranges, former and current hot mix plants (asphalt concrete), former burn dumps, and former hospitals (including the former Sutter Memorial Hospital in Sacramento, California, which was repurposed for residential land uses).
- Managed, conducted, and provided technical oversight for the following:
 - Numerous petroleum-related facilities including retail gasoline service stations, bulk fuel facilities, pipeline projects, and automotive dealerships throughout the western United States.
 - A former coal mine that was backfilled with cement kiln dust (CKD) near Ravensdale, Washington.
 - Several “Rails to Trails” projects in California.
 - Various remediation and compliance projects including the following California sites: Port of Richmond, Marina Bay, North Hollywood Operable Unit (NHOU) Superfund Site, and the Pacific Gas and Electric’s (PG&E’s) Topock and Hinkley Compressor Station sites. Some of the remediation and/or mitigation technologies have included large scale soil remediation projects, dual phase extraction (DPE) systems, air sparge (AS)/soil vapor extraction (SVE) systems, in-situ chemical oxidation (ISCO), and sub-slab depressurization (SSD) systems.

- Several Brownfields projects.
- Various solid waste facilities including active and former landfills including former burn dumps.
- Operated and maintained soil, soil gas, and groundwater remediation systems.
- Designed and conducted groundwater monitoring programs.
- Provided geologist services for both environmental and geotechnical subsurface investigations.

EDUCATION

- Bachelor of Arts in Geography (1995), University of Utah, Salt Lake City, Utah
- Bachelor of Arts in Geology (2000), University of Colorado, Boulder, Colorado

PROFESSIONAL REGISTRATIONS

- Professional Geologist, California #9170
- Professional Geologist, Oregon #G2167
- Professional Geologist, Utah #2250
- Professional Geologist, Washington #2623
- OSHA 29 CFR 1910.120 40 Hour HAZWOPER

PROFESSIONAL DEVELOPMENT COURSES

- *The Vapor Intrusion Risk Pathway: A Practical Guide* presented on May 8 and 9, 2018, in Santa Fe, New Mexico, by Hartman Environmental Geoscience (HEG) Training. Instructor was Dr. Blayne Hartman with HEG. Equivalent to 13.0 professional development hours.
- *Advances in Assessment the Vapor Intrusion Pathway* presented on December 4, 2018, by Air & Waste Management Association in Phoenix, Arizona. Instructors were Mr. Robert Ettinger, Senior Principal Environmental Scientist, Geosyntec; and Dr. Loren Lund, Vapor Intrusion/Risk Assessment Leader, Jacobs. Equivalent to 3.5 professional development hours.
- *Vapor Intrusion, Remediation, and Site Closure* presented on December 5 and 6, 2018, by Air & Waste Management Association in Phoenix, Arizona. Equivalent to 10.0 professional development hours.
- *Principles of Vapor Mitigation Design and Installation* presented on January 13 and 14, 2021, by Rutgers, The New Jersey Agricultural Experiment Station Office of Continuing Professional Education. Equivalent to 6.5 professional development hours.
- *Petroleum Remediation Principles and Technologies for Soil, Vapor, and Groundwater* presented on January 26 and 27, 2021, by the National Environmental Management Academy and the California Regional Water Quality Control Board.



Stephanie Clorey

*Project Manager Site Investigation and
Remediation Group*

21 B Street

Burlington, MA 01803

Office: 617.715.0000 Mobile: 617.308.0000

Home: 781.200.7000

PROFESSIONAL REGISTRATIONS

40-Hour OSHA Hazardous Worker/ 8 Hour Refresher

Maryland Certified Drinking Water Sampler

Maryland Certified Asbestos Inspector

Maryland Certified Lead Inspector

Professional Geologist Tennessee