



PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

2021 Fund VI Recap

4444 East 26th Street
Vernon, California 90058

November 15, 2021
Partner Project No. 21-342562.35



Prepared for:

LBA RVI-Company XII, LLC and Bank of America, N.A.
3347 Michelson Drive, Suite 200
Irvine, California 92612

November 15, 2021

Ms. Lindsey Cochran
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Subject: Phase I Environmental Site Assessment
4444 East 26th St 2021 Fund VI Recap
4444 East 26th Street
Vernon, California 90058
Partner Project No. 21-342562.35

Dear Ms. Cochran:

Partner Engineering and Science, Inc. (Partner) is pleased to provide the results of the *Phase I Environmental Site Assessment* (Phase I ESA) report of the abovementioned address (the "subject property"). This assessment was performed in conformance with the scope and limitations as detailed in the ASTM Practice E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

The Phase I Environmental Site Assessment is designed to provide an assessment concerning environmental conditions (limited to those issues identified in the report) as they exist at the subject property. This assessment included a site reconnaissance as well as research and interviews with representatives of the public, property ownership, site manager, and regulatory agencies. An assessment was made, conclusions stated, and recommendations outlined.

We appreciate the opportunity to provide environmental services to you. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (310) 622-8855.

Sincerely,



Debbie Stott, P.G.
Principal

EXECUTIVE SUMMARY

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in accordance with the scope of work and limitations of ASTM Standard Practice E1527-13, the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) for the property located at 4444 East 26th Street in the City of Vernon, Los Angeles County, California (the "subject property"). The Scope of Services performed is in accordance with the contract between LBA Realty, LLC (LBA) and Partner dated October 14, 2013.

Property Description

The subject property is located on the southwest corner of the intersection of East 26th Street and Ayers Avenue within an industrial area of Vernon, Los Angeles County, California. Please refer to the table below for further description of the subject property:

Subject Property Data

Address:	4444 East 26th Street, Vernon, California 90058
Historical Addresses:	4429 East 26 th Street, 2601 and 2625 Ayers Avenue
Property Use:	Office/Warehouse
Land Acreage (Ac):	3.38 Ac
Number of Buildings:	One
Number of Floors:	One
Date of Construction:	1960
Assessor's Parcel Number (APN):	5243-018-017
Type of Construction:	Concrete Tilt-Up
Current Tenants:	JSource
Zoning:	Industrial
Site Assessment Performed By:	Joseph Kim of Partner
Site Assessment Conducted On:	October 28, 2021

The subject property is currently occupied by JSource, a sub-tenant of ACCO (HVAC equipment and installation company). Onsite operations consist of the warehousing and distribution of various consumer merchandises. An office area and a loading dock were located on the northeast corner and north side of the building. In addition to the current structure, the subject property is improved with paved parking area and fencing. Access to the subject property is provided via an entrance along Ayers Avenue.

No evidence of the use of reportable quantities of hazardous substances was observed on the subject property. Small quantities of retail cleaning products and general maintenance supplies were found to be properly labeled and stored at the time of the assessment with no signs of leaks, stains, or spills. The storage and use of maintenance supplies does not appear to pose a significant threat to the environmental integrity of the subject property at this time. No evidence of current aboveground storage tanks (ASTs) or underground storage tanks (USTs) was observed during the site reconnaissance.

According to review of available historical data, it appears that the subject property was agriculturally developed land from 1928 to at least 1938. Aerial photography and a 1950 Sanborn map indicate that by 1948 a lumber yard was operated onsite on the southern half of the property. By 1964 the current

building was visible on aerial photographs. Since that time, various commercial/ industrial tenants have occupied the building including:

Year	Tenant (Use)
1950, 1952	Lumber yard
1962	Covina San Bernardino, Timber Fasteners Inc. (warehouse)
1962-1971	Glidden Co. Chemicals Group, Glidden Durkee Division of SCM Corporation, Pemco Div of Glidden Co., Pigments Colors Metals Div., Ceramics Group Pemco
1967-1971	California Cartage Co. Inc.
1967-1971	Fulton Cotton Mills
1975-1980	TBA & Lubricants
1980-1981	Exxon Company USA, Exxon Products for offsite service stations
1981	Sunway Corp.
1981-2015	West Coast Agencies
1981-2017	F & S Distributing Co. Inc.
2004-2009	California Mininbridg Transport
2018	Vacant
2020-Present	ACCO, JSource

In December 2017, Partner prepared a Phase I ESA and Phase II Investigation Report for the subject property. At the time of the site visit, the subject property was developed with the existing office/warehouse building on the south side of the site, a former truck repair shed used solely for storage on the northwest side of site, and a guard shack on the north side of site. The subject property was occupied by F&S Distribution, a cartage facility. Site operations included receiving and storage of products prior to pick up and distribution by various clients. The facility warehoused and distributed mainly food products (ascorbic and calcium acid, other additives, sugar, salt), household electronics, and assorted items such as wood chips and limestone. Floors within the former truck maintenance area were observed to be heavily stained.

In 2017 hazardous substances observed at the subject property included hydraulic, transmission, brake, and multifunctional fluid, ethylene glycol, engine coolant, urea solution, "PVC powder", and plastic materials, stored in 55-gallon drums, 5-gallon buckets, and 10-liter two-packs. Urea solution and engine coolant were stored in DOT 200-300 gallons totes, primarily on the loading dock. These items were not used onsite. According to the site manager, approximately 20 years ago F&S Distribution ceased storing hazardous materials such as oils, oxidizers, and limited solvents and paint-related materials. The site manager reported that minor spills that occurred previously were confined to the warehouse interior and were cleaned up with absorbent materials immediately.

According to City of Vernon Building Department (CVBD) records, in 1980, two underground storage tanks (USTs) including a 5,000-gallon gasoline and a 10,000-gallon diesel USTs were installed at the subject property. The two USTs and an adjacent fuel dispenser were located on the northwest corner of the subject property, north of the truck repair shed. In 1986, a CVBD Fire Permit was issued to remove two USTs (5,000-gallon gasoline and 10,000-gallon diesel), lines, wells, and pipes and install one modern

welded 20,000-gallon plasteel tank and piping. It was noted that between 1988 and 1991, soil samples were taken, and contamination was identified that required remediation prior to installation of the new tank. Soil contamination was excavated to clean soil (depth not provided). Lab results reportedly indicated satisfactory remediation. The Vernon Health Department reportedly authorized the use of the remediated soil as backfill for the excavation. It is unclear if a new tank was installed. No other documentation related to the former USTs was identified. No laboratory data, remediation reports, or agency closure letters were identified in CVBD files.

According to a CVBD Mechanical Permit, two 4'X30' overflow seepage pits were installed at the subject property in 1980. The seepage pits were connected to an existing seepage pit and septic tank. An attached figure depicts the septic tank and three seepage pits as located adjacent to the northeast side of the building. In 1986, a Plumbing Permit indicated that a sewer lateral to the street was installed from the existing warehouse. No further information was identified regarding the septic tank and associated seepage pits.

On December 7, 2017, Partner conducted a Phase II Subsurface Investigation at the subject property to evaluate the location of on-site USTs, former tankholds, and other features and to evaluate the potential impact of petroleum hydrocarbons and volatile organic compounds (VOCs) to soil in the vicinity of the former UST, the truck maintenance area, former septic system, and former storage of cyanide products. The scope of the Phase II Subsurface Investigation included a geophysical survey and seven soil borings. Nineteen soil samples were analyzed for total petroleum hydrocarbons total carbon chain (TPH-cc) and VOCs, four soil samples were analyzed for CAM 17 Metals, and two soil samples were analyzed for cyanide.

Analytical results indicated:

- None of the analyzed soil samples contained detectable concentrations of TPH-cc above laboratory PQLs and the PQLs were below applicable regulatory guidelines.
- None of the detected concentrations of toluene, ethylbenzene, and m,p-xylene in soil exceeded applicable screening levels. No other VOCs were detected in any of the analyzed soil samples above applicable regulatory guidelines.
- Mercury concentrations in three soil samples exceeded background concentrations, but did not exceed applicable screening levels. Arsenic was detected above screening levels in one soil sample, but did not exceed typical background concentrations. Therefore, the concentrations of arsenic are expected to be naturally occurring. No other metals were detected in the analyzed soil samples at concentrations exceeding laboratory PQLs and/or typical background concentrations.
- None of the detected concentrations of cyanide in soil exceeded applicable screening levels.

The geophysical survey identified one anomaly in the northwestern portion of the subject property to the north of the current truck repair bays. The location and shape of the anomaly, which consisted of a backfilled excavation, generally correspond to the location of the former USTs. No large metallic features

were identified within either anomaly, which confirms that the USTs have been removed and no additional USTs were installed.

Based on the geophysical survey, no additional USTs were installed on-site after the removal and remediation of the two former USTs. The analytical data indicated that residual impacts as a result of the removal of the two former USTs and the staining and potential septic tank did not appear to be negatively impacting the subject property. Partner recommended no further investigation with respect to the former USTs, the current truck repair bays/ staining, or the former septic system.

The agency database report obtained from Environmental Data Resources, Inc. (EDR) identified the subject property as:

- ACCO Engineered Systems (EDR Map ID: A1), is identified on the CERS database. The facility is identified as a chemical storage facility. Minor violations, administrative in nature (failure to submit a hazardous materials business plan), were issued in 2014 and 2015.
- F&S Distribution (EDR Map ID: A3, A5, A8, A10, A11, A13, A16), is identified on the SWEEPS UST, FINDS, FTTS, HIST FTTS, HIST UST, NPDES, Waste Discharge System (WDS), ECHO, HWTS, and HAZNET databases. The SWEEPS UST and HIST UST databases identified two USTs including 5,000-gallon regular gasoline UST and 10,000-gallon diesel UST, installed in 1980. No removal dates were provided. The facility is identified on the HAZNET database for generating state-regulated wastes including "other organic solids and off-specification, aged, or surplus organics" that were manifested for off-site disposal in 1997 and 1998. The FINDS database identified the facility as a TSCA Submitter. As discussed in Section 4.1.3, according to City of Vernon EHD records reviewed by Partner, in March 1994, the facility was reportedly warehousing about 120,000 pounds of sodium cyanide every 3 to 4 months. The facility discontinued warehousing the sodium cyanide to avoid being required to prepare a RMPP. By May 24, 1994, the cyanide was no longer onsite.
- LBA Realty (EDR Map ID: A4), is identified on the HAZNET and HWTS databases. This facility is listed in the HAZNET database for generating state-regulated wastes including "Asbestos containing waste" that were manifested for off-site disposal in 2018. Based on the regulatory status and lack of listings in other databases indicating violations and/or a release, this listing is not considered to have created an environmental concern to the subject property.
- ACTEO Corporation (EDR Map ID: A6, A7), is identified on the CERS, HAZNET and HWTS databases. This facility is identified on the HAZNET database for generating state-regulated wastes including "laboratory waste and off-specification, aged, or surplus organics" that were manifested for off-site disposal in 2000 and 2001.
- H&S Marketing (EDR Map ID: A9), is identified on the HIST UST, HWTS, and HAZNET databases. No information is listed on the HIST UST database. The facility is identified on the HAZNET database for generating state-regulated wastes including "off-specification, aged, or surplus organics" that were manifested for off-site disposal in 2010.

- Witco Corp. (EDR Map ID: A2, A12, A14, A18), is identified on the RCRA-SQG, ECHO, FINDS, HWTS, and HAZNET databases. The facility is identified on the HAZNET database for generating state-regulated wastes including “pesticides and other waste associated with pesticide production, other organic solids, liquids w/pH<=2, and off-specification, aged, or surplus organics” that were manifested for off-site disposal in 1998.
- California Transport (EDR Map ID: A15, A17), is identified on the RCRA-SQG, FINDS, ECHO, and HAZNET databases. No RCRA violations were listed. RCRA Code D039 (tetrachloroethylene) was listed. The facility is identified on the HAZNET database for generating state-regulated wastes including “aqueous solution with total organic residues less than 10 percent” that were manifested for off-site disposal between 2011 and 2014.

Based on the information provided in the EDR Database report and results of the Phase II investigation (see Section 5.2.6), these listings are not considered to have the potential to create an environmental concern at the subject property.

Online data was reviewed for two upgradient facilities with the potential to impact the groundwater in the site vicinity (See Section 4.2.4). Based on distance from the listed sites and depth to groundwater, vapor intrusion is considered to be unlikely. Partner found no evidence that the subject property was a groundwater contaminant source.

The subject property is located within an industrial area. During the vicinity reconnaissance, Partner observed the following land use on properties in the immediate vicinity of the subject property:

Immediately Surrounding Properties

North:	East 26 th Street, followed by Atchison Topeka and Santa Fe Railroad and railroad yard.
South:	Abandoned railroad spur, followed by Dollar Empire (4425-4429 Bandini Boulevard) and Bakery Depot Inc. (4489 Bandini Boulevard).
East:	Ayers Avenue, followed by BNSF – Lot 11 (4560 East 26 th Street) and classic Concepts (4505 Bandini Boulevard).
West:	Peerless Materials Company (4442 East 26 th Street).

No environmental concerns associated with adjacent properties were identified based on visual observation from publicly accessible rights-of-way.

No potential vapor intrusion concerns were identified onsite nor from offsite facilities.

According to information obtained from the State Water Resources Control Board online database, GeoTracker, for a nearby release (Case Number T0603767053 – 4477 East Shelia Street) and topographic map interpretation, groundwater in the vicinity of the subject property is present at depth of 112 to 115 feet bgs and flows toward the south-southeast.

Findings

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

- Partner did not identify RECs during the course of this assessment.

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

- Partner did not identify CRECs during the course of this assessment.

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

- In December 2017, Partner conducted a geophysical survey and a Phase II Subsurface Investigation at the subject property to evaluate the location of former on-site UST tankholds and to evaluate the potential impact of petroleum hydrocarbons and VOCs to soil in the vicinity of the former USTs, the truck maintenance area, former septic system, and former storage of cyanide products. Based on the removal of the tanks with agency involvement, the geophysical survey, and the analytical results, the former USTs, truck maintenance area, septic system, and storage of cyanide products are considered a HREC and no further action is considered necessary.

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

- Partner did not identify environmental issues during the course of this assessment.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 4444 East 26th Street, Vernon, Los Angeles County, California (the "subject property"). Any exceptions to or deletions from this practice are described in Section 1.5 of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property. An HREC were identified. Based on the conclusions of this assessment, Partner has no recommendations for further assessment at this time.

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1.0 INTRODUCTION

Partner Engineering and Science, Inc. (Partner) has performed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Standard Practice E1527-13 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312) for the property located at 4444 East 26th Street in Vernon, Los Angeles County, California (the "subject property"). Any exceptions to, or deletions from, this scope of work are described in the report.

1.1 Purpose

The purpose of this ESA is to identify existing or potential Recognized Environmental Conditions (as defined by ASTM Standard E-1527-13) affecting the subject property that: 1) constitute or result in a material violation or a potential material violation of any applicable environmental law; 2) impose any material constraints on the operation of the subject property or require a material change in the use thereof; 3) require clean-up, remedial action or other response with respect to Hazardous Substances or Petroleum Products on or affecting the subject property under any applicable environmental law; 4) may affect the value of the subject property; and 5) may require specific actions to be performed with regard to such conditions and circumstances.

This ESA was performed to permit the User to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on scope of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) liability (hereinafter, the "landowner liability protections," or "LLPs"). ASTM Standard E-1527-13 constitutes "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35)(B).

In order to qualify for one of the *LLPs* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the *Brownfields Amendments*), the *User* must provide the following information (if available) to the *environmental professional*. Failure to provide this information could result in a determination that *all appropriate inquiry* is not complete. The user is asked to provide information or knowledge of the following:

- Environmental cleanup liens that are filed or recorded against the site.
- Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry.
- Specialized knowledge or experience of the person seeking to qualify for the LLPs.
- Relationship of the purchase price to the fair market value of the *property* if it were not contaminated.
- Commonly known or *reasonably ascertainable* information about the *property*.
- The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate assessment.
- The reason for preparation of this Phase I ESA.

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

1.2 Scope of Work

The scope of work for this ESA is in accordance with the requirements of ASTM Standard E 1527-13 and the contract between LBA Realty and Partner dated October 14, 2013.

This assessment included: 1) a property and adjacent site reconnaissance; 2) interviews with key personnel; 3) a review of historical sources; 4) a review of regulatory agency records; and 5) a review of a regulatory database report provided by a third-party vendor. Partner contacted local agencies, such as environmental health departments, fire departments and building departments in order to request for review records of current and/or former hazardous substances usage, storage and/or releases of hazardous substances on the subject property.

Partner researched information on the presence of activity and use limitations (AULs) at the appropriate agencies. As defined by ASTM E1527-13, AULs are the legal or physical restrictions or limitations on the use of, or access to, a site or facility: 1) to reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil or groundwater on the subject property; or 2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include institutional and/or engineering controls (IC/ECs), are intended to prevent adverse impacts to individuals or populations that may be exposed to hazardous substances and petroleum products in the soil or groundwater on the property.

If requested by Client, this report may also include the identification, discussion of, and/or limited sampling of asbestos-containing materials (ACMs), lead-based paint (LBP), microbial growth, and/or radon.

1.3 Limitations

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

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

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

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

1.4 User Reliance

Reliance on this report by the client and all authorized parties will be subject to the terms, conditions and limitations stated in the Master Services Agreement (MSA) dated October 14, 2013 between Partner Engineering and Science, Inc. and LBA Realty, LLC and its assigns.

Bank of America, N. A., its employees, agents, successors and assigns may rely upon this report in evaluating a request for an extension of credit to be secured by the subject property. This report may also be used and relied upon by (a) any additional lender extending credit to be secured by the subject property (the credit to be extended by Bank of America, N.A. and such additional lender is referred to as the "Mortgage Loan") and (b) any actual or prospective purchaser, transferee, assignee, or servicer of the Mortgage Loan (or any portion thereof), any actual or prospective investor (including agent or advisor) in any securities evidencing a beneficial interest in or backed by the Mortgage Loan (or any portion thereof), any rating agency actually or prospectively rating any such securities, any indenture trustee, and any institutional provider (s) from time to time of any liquidity facility or credit support for such financing. In addition, this report or a reference to this report may be included or quoted in any offering circular, private placement memorandum, registration statement or prospectus and Partner Engineering and Science agrees to cooperate in answering questions by any of the above parties in connection with a securitization or transaction involving the Mortgage Loan (or any portion thereof) and/or such securities. This report has no other purpose and should not be relied upon by any other person or entity.

1.5 Limiting Conditions

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

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

- Interviews with past owners, operators and occupants were not reasonably ascertainable and thus constitute a data gap. Based on information obtained from other historical sources (as discussed in Section 3.0), this data gap is not expected to alter the findings of this assessment. Partner was allowed access to all areas of the building. Based on the use by tenants as office space this limitation does not alter the findings of this assessment.
- An environmental cleanup lien search was not performed. However, it is Partner's opinion that the lack of the lien search does not represent a significant data gap, in that it does not impact Partner's ability to identify recognized environmental conditions at the subject property and therefore it does not alter the conclusions of this report. According to the Title Commitment and EDR Report, NPL (Superfund) and other environmental liens are not associated with the subject property. A title report provided by LBA did not indicate environmental liens filed against the property. Based on available information, no environmental liens appear to be associated with the subject property.

2.0 SITE DESCRIPTION

2.1 Site Location and Legal Description

The subject property at 4444 East 26th Street, Vernon, California is located on the southwestern intersection of East 26th Street and Ayers Avenue. The subject property was inspected by Joseph Kim of Partner on October 28, 2021. The weather at the time of the site visit was sunny and in the mid-70s (degrees Fahrenheit). According to the Los Angeles County Assessor, the subject property is legally described as OM 3-19-27 EX OF R/W AND STS LOT 3 DIV 105 REG 48 and is owned by LBA RVI – Company VIII, LLC.

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

2.2 Current Property Use

The subject property is currently occupied by JSource, a sub-tenant of ACCO (HVAC equipment and installation company). Onsite operations consist of the warehousing and distribution of various consumer merchandises. An office area and a loading dock were located on the northeast corner and north side of the building. In addition to the current structure, the subject property is improved with paved parking area and fencing. Access to the subject property is provided via an entrance along Ayers Avenue.

2.3 Current Use of Adjacent Properties

The subject property is located within an industrial area. During the vicinity reconnaissance, Partner observed the following land use on properties in the immediate vicinity of the subject property:

Immediately Surrounding Properties

North: East 26th Street, followed by Atchison Topeka and Santa Fe Railroad and railroad yard.

South: Abandoned railroad spur, followed by Dollar Empire (4425-4429 Bandini Boulevard) and Bakery Depot Inc. (4489 Bandini Boulevard).

East: Ayers Avenue, followed by BNSF – Lot 11 (4560 East 26th Street) and classic Concepts (4505 Bandini Boulevard).

West: Peerless Materials Company (4442 East 26th Street).

No environmental concerns associated with adjacent properties were identified based on visual observation from publicly accessible rights-of-way.

2.4 Physical Setting Sources

2.4.1 Topography

The United States Geological Survey (USGS) *Los Angeles, California* Quadrangle 7.5-minute series topographic map was reviewed for this ESA. The subject property lies at an approximate elevation of 161 feet above mean sea level (msl) with a local topographic gradient toward the southeast.

A copy of the most recent topographic map is included as Figure 3.

2.4.2 Hydrology

According to information obtained from the State Water Resources Control Board online database, GeoTracker, for a nearby release (Case Number T0603767053 – 4477 East Shelia Street) and topographic map interpretation, groundwater in the vicinity of the subject property is present at depth of 112 to 115 feet bgs and flows toward the south-southeast.

The nearest surface water in the vicinity of the subject property is the Los Angeles River located approximately 2,000 feet southwest of the subject property. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed on the subject property during this assessment.

2.4.3 Geology/Soils

The site is located in the Peninsular Ranges geomorphic province. The Peninsular Ranges are a northwest-southwest oriented complex of blocks separated by similarly trending faults. They extend from the Transverse Ranges and the Los Angeles Basin south to the Mexican border and beyond to the tip of Baja California and are bounded on the east by the Colorado Desert and the Gulf of California. The Peninsular Ranges contain minor Jurassic and extensive Cretaceous igneous rocks associated with the Nevadan plutonism. Marine Cretaceous sedimentary rocks are well represented, and post-Cretaceous rocks form a restricted veneer of volcanic, marine, and nonmarine sediments.

Based on information obtained from the United States Department of Agriculture (USDA) Natural Resources Conservation Service Web Soil Survey online database, the subject property is mapped as Urban land-Biscailuz-Hueneme, drained complex. The Biscailuz series consists of very deep, somewhat poorly drained soils that formed in alluvium from mixed rock sources. Biscailuz soils are on floodplains and lowlands. Slopes range from 0 to 5 percent. The Hueneme soils have grayish brown, loamy fine sand and light sandy loam, moderately alkaline A horizons and stratified, grayish brown, light brownish gray and light gray, calcareous C horizons of sandy loams through sands with thin silt layers, mottled, and containing segregated gypsum. Urban land is a combination of soils that are so intermingled that they cannot be separately mapped. The original soils have been altered by grading, cutting, filling, and shaping the ground surface so that the natural soils cannot be determined.

2.4.4 Flood Zone Information

Partner performed a review of the Flood Insurance Rate Map, published by the Federal Emergency Management Agency. According to Community Panel Number 06037C1643F, dated September 26, 2008, the subject property appears to be located in Zone X, an area located outside of the 100-year and 500-year flood plains.

3.0 HISTORICAL INFORMATION

Partner obtained historical use information about the subject property from a variety of sources. Information regarding past land use was obtained by a review of historical aerial photographs, historical Sanborn Fire Insurance maps, city directories, and historical topographic maps of the subject property and surrounding area obtained from Environmental Data Resources (EDR). Copies of the historical resources are included in **Appendix B**. EDR reported that Sanborn™ Fire Insurance Maps were available for the subject property. A chronological listing of the historical data found is summarized in the table below.

Date	Scale or Address	Source	Summary
1894, 1896, 1899, 1900, 1902, 1923	15-minute	Topographic Map	The subject property and surrounding properties are depicted as vacant land. A railroad is shown to the north.
1924/25, 1926/28	15-minute	Topographic Map	Changes include the south-southwest property which is depicted with one small structure
1928	1"=500'	Aerial Photograph	The subject property is agricultural land. The north property is developed with a road and railroad tracks. The west and south properties are utilized for agricultural purposes. The east property is developed with a road and the area beyond is utilized for agricultural purposes.
1938	1"=500'	Aerial Photograph	Changes include the southeast property which appears to be cleared, disturbed land
1948	1"=500'	Aerial Photograph	The subject property appears to be utilized as a storage lot. The north property appears unchanged; the east property appears to be undeveloped land; the south properties are developed with industrial structures; and the west property is a storage lot followed by undeveloped land.
1950	2625 Ayers Ave.	Sanborn Map	The subject property is depicted with a saw mill and associated outbuildings including offices and a sawdust bin/blower, as well as a rail spur in the south portion of the property. The north property is depicted with East 26 th Street; the east property is depicted with Ayers Avenue

Date	Scale or Address	Source	Summary
			followed by a maintenance/storage yard; the southeast property is depicted as a vacant lot; the south properties are depicted with Southland Paper Converting Co. (bag manufactures) and Wilco Co. (cleaning and polishing products manufacturer) beyond railroad tracks; and the west property is depicted as part of the saw mill.
1952, 1954	1"=500'	Aerial Photograph	No significant changes are visible from the previous aerial photograph.
1952/53	7.5 minute	Topographic Map	The subject property and adjacent properties are shaded red to indicate an area of dense development. The railroad tracks to the north and south are shown as well as area roadways.
1962	4444 E. 26th St.	City Directories	Covina San Bernardino, Timber Fasteners Inc. (warehouse)
1962-1971	4444 E. 26th St.	City Directories	Glidden Co. Chemicals Group, Glidden Durkee Division of SCM Corporation, Pemco Div of Glidden Co., Pigments Colors Metals Div., Ceramics Group Pemco
1963	1"=500'	Aerial Photograph	The subject property appears developed with an industrial building that is slightly smaller than the current structure. The south and southeast adjoining properties appear to be developed with industrial improvements. The east property appears to be utilized as a maintenance yard. The west property is an undeveloped lot.
1964/66	7.5 minute	Topographic Map	The subject property is depicted with a commercial/industrial structure that is slightly smaller than the current building. The south and southeast properties are depicted with industrial/ commercial buildings. The west property is a vacant lot. No changes are

Date	Scale or Address	Source	Summary
			depicted to the north.
1967-1971	4444 E. 26th St.	City Directories	California Cartage Co. Inc., Fulton Cotton Mills, Glidden Co Chemicals Group, Pemco Div of Glidden, Special Metals Inc.
1968	2601 Ayers Ave., 4444 E. 26th St.	Sanborn Map	The subject property is depicted with a warehouse labeled as Calif. Cartage Co. Inc. and a truck parking area. Changes to the adjoining properties from the 1950 Sanborn map include the southeast property which is depicted with a carpet warehouse.
1971	4444 E. 26th St.	City Directories	California Cartage Co., Ceramics Group Pemco, Fulton Cotton Mills, Glidden Durkee
1972	1"=500'	Aerial Photographs	No significant changes are visible with the exception that an addition has been added to the west side of the industrial building and the property appears with current improvements.
1972	7.5 minute	Topographic Map	No changes from the previous topographic map are depicted.
1975-1980	4444 E. 26th St.	City Directories	TBA & Lubricants
1980	4444 E. 26th St.	City Directories	Exxon Co.
1981	4444 E. 26th St.	City Directories	Exxon Product Orders Gasoline & Other Light Products, F & S Distributing Co. Inc., Sunway Corp.
1981-2015	4444 E. 26th St.	City Directories	West Coast Agencies Inc.
1981-2017	4444 E. 26th St.	City Directories	F & S Distributing Co. Inc.
1981	7.5 minute	Topographic Map	Changes include the west property which is depicted with the current structure.

Date	Scale or Address	Source	Summary
1977, 1979, 1981, 1989, 1994	1"=500'	Aerial Photographs	No significant changes are visible with the exception that the east property has been developed with the current improvements.
1994	7.5 minute	Topographic Map	No significant changes are depicted from the previous topographic map.
2002	1"=500'	Aerial Photograph	No significant changes depicted from the previous aerial photograph.
2004-2009	4444 E. 26th St.	City Directory	California Transport, California Mininbridg Transport
2005	1"=500'	Aerial Photograph	No significant changes depicted from the previous aerial photograph with the exception that the east property, across Ayers Avenue, is developed with a trailer parking/ storage lot.
2009, 2012, 2016	1"=500'	Aerial Photograph	No significant changes depicted from the previous aerial photograph.
2018	4444 E. 26th St..	Site Visit	Vacant
2020-present	4444 E. 26th St.	Site Visit	ACCO, JSource

According to review of available historical data, it appears that the subject property was agriculturally developed land from 1928 to at least 1938. Aerial photography and a 1950 Sanborn map indicate that by 1948 a lumber yard was operated onsite on the southern half of the property. By 1964 the current building was visible on aerial photographs. Since that time, various commercial/industrial tenants have occupied the building including:

Year	Tenant (Use)
1950, 1952	Lumber yard
1962	Covina San Bernardino, Timber Fasteners Inc. (warehouse)
1962-1971	Glidden Co. Chemicals Group, Glidden Durkee Division of SCM Corporation, Pemco Div of Glidden Co., Pigments Colors Metals Div., Ceramics Group Pemco
1967-1971	California Cartage Co. Inc.
1967-1971	Fulton Cotton Mills
1975-1980	TBA & Lubricants
1980-1981	Exxon Company USA, Exxon Products for offsite service stations
1981	Sunway Corp.
1981-2015	West Coast Agencies
1981-2017	F & S Distributing Co. Inc.
2004-2009	California Mininbridg Transport
2018	Vacant
2020-Present	ACCO, JSource

Common agricultural practices can result in residual concentrations of fertilizers, pesticides, or herbicides in near-surface soil, though not generally at concentrations that pose a significant health risk. It is Partner's opinion that, since the site has been graded, redeveloped, and paved, remaining pesticide or herbicide residues, if any, are likely to have been dispersed during these construction activities and therefore are unlikely to impact human health or the environment. Accordingly, no further investigation is recommended regarding potential residual pesticide.

4.0 REGULATORY RECORDS REVIEW

4.1 Regulatory Agencies

4.1.1 State Department

Regulatory Agency Data

Name of Agency:	California Environmental Protection Agency (CalEPA)
Point of Contact:	CalEPA Regulated Sites Portal
Agency Address:	https://siteportal.calepa.ca.gov/nsite/ 1001 I Street, Sacramento, California
Agency Phone Number:	(916) 323-2514
Date of Contact:	October 2021
Method of Communication:	Online Research
Summary of Communication:	ACCO Engineered Systems at 4444 E. 26 th St. is listed in Chemical Storage Facilities database. Regulatory listings pertaining to ACCO are further discussed in Section 4.2.2.

4.1.2 Health Department

Regulatory Agency Data

Name of Agency:	City of Vernon Environmental Health Department (EHD)
Point of Contact:	Public Records Act Coordinator
Agency Address:	4305 South Santa Fe Avenue, Vernon, CA 90023
Agency Phone Number:	(323) 583-8811
Date of Contact:	N/A
Method of Communication:	Email / Online
Summary of Communication:	Records were previously obtained and reviewed by Partner.

Records included inspection reports, Hazardous Materials Establishment Reporting Form, Hazardous Materials Inventory Report, Business/Contingency Plans, and Hazardous Material License renewal for F&S Distributing between 1991-2017. F&S Distributing warehoused and distributed chemicals/hazardous materials.

- In June 1991, the Inspection Report noted that many materials including oil well treating compound, sodium hydroxide, bleach, hydrofluoric acid, ammonium difluoride, propane, Carpabon CBL, Mark 565 with stoddard solvent, part cleaning solvent, motor oil, and waste oil were present onsite but not listed on the inventory.
- In March 1994, the facility was reportedly warehousing about 120,000 pounds of sodium cyanide every 3 to 4 months. The facility discontinued warehousing the sodium cyanide to avoid being required to prepare a RMPP. In May 1994, it was noted that F&S Distributing was working on removing the cyanide. By May 24, 1994, the cyanide was no longer onsite.
- In 1997, an Inspection Report noted that F&S Distributing was ordered to stop discharging wastewater with soap along the west side of the property line.
- In 2003, no USTs were identified onsite. A propane 500-gallon AST and 200-gallon lubricating oil (new & waste) AST were noted.

No records pertaining to the former USTs were identified in EHD records.

4.1.3 Air Pollution Control Agency

Regulatory Agency Data

Name of Agency: South Coast Air Quality Management District (AQMD)
Source: <http://www3.aqmd.gov/webappl/fim/prog/search.aspx>
Agency Phone Number: (909) 396-2000
Date of Contact: October 2021
Method of Communication: Online Research
Summary of Communication: Partner researched the South Coast Air Quality Management District (SCAQMD) online database for information regarding any Permits to Operate (PTO), Notices of Violation (NOV), or Notices to Comply (NTC). Records were found for the subject property related to air emission equipment.

The following records were found for the subject property address:

Facility ID	Facility Name/Address	Status	Equipment Listed	NOVs/NTC
20330	Cal Cartage Co. Inc./4444 East 26 th St.	Inactive	Permits to operate a serv stat storage & dispensing and amine (or DEA) regeneration were issued in 1984. The permits are listed as inactive.	No NOVs or NTCs were identified.

4.1.4 Regional Water Quality Agency

Regulatory Agency Data

Name of Agency: California State Water Resources Control Board (SWRCB)
Source: SWRCB GeoTracker Database
<http://geotracker.waterboards.ca.gov/>
http://geotracker.waterboards.ca.gov/historical_ust_facilities
Agency Phone Number: (916) 341-5250
Date of Contact: October 2021
Method of Communication: Online Research
Summary of Communication: No records regarding hazardous substance use, storage or releases, or the presence of USTs and AULs on the subject property were on file with the SWRCB.

4.1.5 Department of Toxic Substances Control

Regulatory Agency Data

Name of Agency: California Department of Toxic Substances Control (DTSC)
Source: DTSC EnviroStor and Hazardous Waste Tracking System Databases
<http://www.envirostor.dtsc.ca.gov/public/>
http://hwts.dtsc.ca.gov/report_search.cfm?id=5
Agency Phone Number: (916) 324-1826
Date of Contact: October 2021
Method of Communication: Online Research
Summary of Communication: The subject property was not identified in the online DTSC EnviroStor database. The subject property was identified in the online Hazardous Waste Tracking System database as summarized in Section 4.2.2.

4.1.6 Building Department

Regulatory Agency Data

Name of Agency: City of Vernon Building Department (CVBD)
Point of Contact: Public Records Act Coordinator
Agency Address: 4305 South Santa Fe Avenue, Vernon, CA 90023
Agency Phone Number: (323) 583-8811
Date of Contact: N/A
Method of Communication: Email / Online
Summary of Communication: Records were previously obtained and reviewed by Partner, as summarized below:

Building Records Reviewed for 4444 East 26th Street (Subject Property)

Year(s)	Owner/Applicant	Description
1960	California Cartage Company	Building Permit –Foundation for Type III Building
1960		Building Permit – A cesspool
1962	California Cartage Company	Building Permit –Hay Barn
1973	California Cartage Company	Letter-Intent to sell west 161 feet of the parcel.
1974	California Cartage Company	Building Permit – Ramp installation and Remodel.
1980	California Cartage Company	Building & Mechanical Permit- Install two USTs (5,000-gallon gasoline and 10,000-gallon diesel USTs).
1980	F&S Distribution Co.	Mechanical Permit-Construct 2 4'X30' overflow seepage pits, connect to existing seepage pit. Attached figure depicts septic tank and three seepage pits adjacent to the northeast side of the building. Work completed on April 2, 1980.
1981	California Cartage Co./ F&S Distribution Co.	Building Permit – Office and guard shack, fuel island shown on northwest corner of the site, north of truck shed.
1982	Exxon Company	City of Vernon Fire Department Violation Notice – office space.
1983	California Cartage Co. Inc.	Certificate of Occupancy.
1986	F&S Distribution Co.	Tank Assessment- Installation of subsurface leak detection system for UST. USTs (5,000-gallon gasoline and 10,000-

Regulatory Agency Data

Name of Agency: City of Vernon Building Department (CVBD)
Point of Contact: Public Records Act Coordinator
Agency Address: 4305 South Santa Fe Avenue, Vernon, CA 90023
Agency Phone Number: (323) 583-8811
Date of Contact: N/A
Method of Communication: Email / Online
Summary of Communication: Records were previously obtained and reviewed by Partner, as summarized below:

		gallon diesel USTs) are located just inside and to the right of the entrance from East 26 th Street.
1988	F&S Distribution Co.	Fire Permit- Removal of two USTs, lines, wells, and pipes, and install one modern welded 20m gallon plasteel tank and piping. It was noted that between 1988 and 1991, soil samples were taken, and contamination was identified that required remediation prior to the installation of new tanks. Soil contamination was excavated to clean soil (depth not provided). Lab results reportedly indicated satisfactory remediation. Excavation was filled using remediated backfill. No laboratory data or remediation reports were identified in CVBD files.
1990	F&S Distribution Co.	Remove existing roof & apply a 4-ply fiberglass cap sheet system.
1990	F&S Distribution Co.	Electrical Permit-Removal & Install UST
1996	F&S Distribution Co.	Plumbing Permit- Sewer lateral to the street from the existing warehouse. Work completed on June 13, 1996.
2007	California Cartage	Certificate of Occupancy- F&S Distribution Co. LLC (Food warehouse, Public warehouse and trucking).

4.1.7 Planning Department

Regulatory Agency Data

Name of Agency: Los Angeles Planning Department (LAPD)
Point of Contact: Public Records Act Coordinator
Agency Address: 5555 Ferguson Drive, Suite 120-04, Commerce, California 90022
Agency Phone Number: (323) 890-7806
Date of Contact: October 2021
Method of Communication: Email
Summary of Communication: According to records reviewed, the subject property is industrial development.

4.1.8 Oil & Gas Exploration

Regulatory Agency Data

Name of Agency: California Geologic Energy Management Division (CalGEM)
Point of Contact: <https://maps.conservation.ca.gov/doggr/wellfinder>
Agency Address: 801 K Street, MS 24-01, Sacramento, CA 95814

Agency Phone Number: (916) 322-1080
Date of Contact: October 2021
Method of Communication: Online
Summary of Communication: According to CalGEM, no oil or gas wells are located on or adjacent to the subject property.

4.1.9 Assessor's Office

Regulatory Agency Data

Name of Agency: Los Angeles County Assessor
Point of Contact: <https://assessor.lacounty.gov/>
Agency Address: 500 W. Temple St., Los Angeles, California
Agency Phone Number: 213.974.3211
Date of Contact: October 2021
Method of Communication: <https://assessor.lacounty.gov/>
Summary of Communication: According to records reviewed, the subject property is identified by Assessor Parcel Number (APN) 5243-018-017. The current building was constructed in 1960 and totals approximately 59,840 square feet on a 3.38-acre lot.

4.1.10 Sanitation District

Regulatory Agency Data

Name of Agency: Los Angeles County Sanitation District (LACSD)
Point of Contact: Public Records Act Coordinator
Agency Address: 1955 Workman Mill Road, Whittier, CA 90607-4998
Agency Phone Number: (562) 908-4288
Date of Contact: N/A
Method of Communication: N/A
Summary of Communication: Based on a prior Phase I ESA report, LACSD has no records for the subject property.

Copies of pertinent documents obtained by Partner from the above-referenced agencies are included in Appendix B.

4.2 Mapped Database Records Search

Information from standard federal, state, county, and city environmental record sources was provided by Environmental Data Resources, Inc. (EDR). Data from governmental agency lists are updated and integrated into one database, which is updated as these data are released. The information contained in this report was compiled from publicly available sources and the locations of the sites are plotted utilizing a geographic information system, which geocodes the site addresses. The accuracy of the geocoded locations is approximately +/-300 feet. Using the ASTM definition of migration, Partner considers the migration of hazardous substances or petroleum products in any form onto the subject property during the evaluation of each site listed on the radius report, which includes solid, liquid, and vapor. A copy of the EDR report is included as **Appendix C**.

4.2.1 Regulatory Database Summary

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

4.2.2 Subject Property

The agency database report obtained from Environmental Data Resources, Inc. (EDR) identified the subject property as:

- ACCO Engineered Systems (EDR Map ID: A1), is identified on the CERS database. The facility is identified as a chemical storage facility. Minor violations, administrative in nature (failure to submit a hazardous materials business plan), were issued in 2014 and 2015.
- F&S Distribution (EDR Map ID: A3, A5, A8, A10, A11, A13, A16), is identified on the SWEEPS UST, FINDS, FTTS, HIST FTTS, HIST UST, NPDES, Waste Discharge System (WDS), ECHO, HWTS, and HAZNET databases. The SWEEPS UST and HIST UST databases identified two USTs including 5,000-gallon regular gasoline UST and 10,000-gallon diesel UST, installed in 1980. No removal dates were provided. The facility is identified on the HAZNET database for generating state-regulated wastes including "other organic solids and off-specification, aged, or surplus organics" that were manifested for off-site disposal in 1997 and 1998. The FINDS database identified the facility as a TSCA Submitter. As discussed in Section 4.1.3, according to City of Vernon EHD records reviewed by Partner, in March 1994, the facility was reportedly warehousing about 120,000 pounds of sodium cyanide every 3 to 4 months. The facility discontinued warehousing the sodium cyanide to avoid being required to prepare a RMPP. By May 24, 1994, the cyanide was no longer onsite.
- LBA Realty (EDR Map ID: A4), is identified on the HAZNET and HWTS databases. This facility is listed in the HAZNET database for generating state-regulated wastes including "Asbestos containing waste" that were manifested for off-site disposal in 2018. Based on the regulatory status and lack of listings in other databases indicating violations and/or a release, this listing is not considered to have created an environmental concern to the subject property.
- ACTEO Corporation (EDR Map ID: A6, A7), is identified on the CERS, HAZNET and HWTS databases. This facility is identified on the HAZNET database for generating state-regulated wastes including "laboratory waste and off-specification, aged, or surplus organics" that were manifested for off-site disposal in 2000 and 2001.
- H&S Marketing (EDR Map ID: A9), is identified on the HIST UST, HWTS, and HAZNET databases. No information is listed on the HIST UST database. The facility is identified on the HAZNET database for generating state-regulated wastes including "off-specification, aged, or surplus organics" that were manifested for off-site disposal in 2010.
- Witco Corp. (EDR Map ID: A2, A12, A14, A18), is identified on the RCRA-SQG, ECHO, FINDS, HWTS, and HAZNET databases. The facility is identified on the HAZNET database for generating state-regulated wastes including "pesticides and other waste associated with pesticide production, other organic solids, liquids w/pH<=2, and off-specification, aged, or surplus organics" that were manifested for off-site disposal in 1998.

- California Transport (EDR Map ID: A15, A17), is identified on the RCRA-SQG, FINDS, ECHO, and HAZNET databases. No RCRA violations were listed. RCRA Code D039 (tetrachloroethylene) was listed. The facility is identified on the HAZNET database for generating state-regulated wastes including “aqueous solution with total organic residues less than 10 percent” that were manifested for off-site disposal between 2011 and 2014.

Based on the information provided in the EDR Database report and results of the Phase II investigation (see Section 5.2.6), these listings are not considered to have the potential to create an environmental concern at the subject property.

4.2.3 Adjacent Properties

The EDR Report identified the following facilities adjacent to the subject property:

- Agrashell Inc. (EDR Map ID: 50), is listed at 4560 East 26th Street, adjacent to the east beyond Ayers Avenue and hydrologically cross-gradient of the subject property. The facility is listed as a SWEEPS UST, HIST UST, CIWQS, CERS, and EMI databases. The SWEEPS UST and HIST UST databases identified one 1,000-gallon gasoline UST installed in 1952. No removal dates were provided. Based on the regulatory status and lack of listing in other databases indicating violations and/or a release, it is Partner’s opinion that this listing does not represent an environmental concern to the subject property.
- Fortifiber Corporation (EDR Map ID: 19), is listed at 4489 Bandini Boulevard, adjacent to the south and hydrologically down-gradient of the subject property. The facility is listed as a FINDS, SWEEPS UST, HIST UST, RCRA-SQG, HAZNET, WDS, and ECHO databases. No RCRA violations were listed. The SWEEPS UST and HIST UST databases identified three USTs including two 12,000-gallon gasoline USTs and one 6,000-gallon gasoline UST installed in 1956. No removal dates were provided. Based on the regulatory status and lack of listing in other databases indicating violations and/or a release, it is Partner’s opinion that this listing does not represent an environmental concern to the subject property.
- Penetone Corp Div. of West Chemical Prod (EDR Map ID: C23), is listed at 4425 Bandini Boulevard, adjacent to the southwest and hydrologically down-gradient of the subject property. The facility is listed as a RCRA-SQG, FINDS and ECHO databases. No RCRA violations were listed. Based on the regulatory status and lack of listing in other databases indicating violations and/or a release, it is Partner’s opinion that this listing does not represent an environmental concern to the subject property.

Based on the findings, vapor migration is not expected to represent a significant environmental concern at this time.

4.2.4 Site Vicinity

Partner reviewed the EDR database report to identify offsite facilities that have suspected or documented environmental concerns or RECs that may negatively impact the subject property. Partner's criteria for further evaluating the potential impact of a listed offsite facility are summarized below:

- The listed offsite facility is documented or assumed to be hydrogeologically up-gradient and a likely pathway exists for known releases of environmentally mobile contaminants to reach the subject property; or, contaminants from the listed offsite facility can reach the subject through other pathways (i.e., surface runoff); and,
- The offsite facility is listed as an open case on one of the following databases: Federal NPL, Federal CORRACTS, Federal CERCLIS, Federal ERNS, and State-Specific lists including, but not limited to State Hazardous Waste Sites, State SCL, State LUST, State Deed Restrictions, State Toxic Pits, Landfill (excluding transfer stations); or
- The facility is a known or suspected concern based on Partner's experience or observations made during the site reconnaissance. (i.e., Dry-cleaning operations that may or may not be listed as RCRA-SQG or a non-adjacent UST site that appears to have a remediation system in place).

Based on a review of previous reports and information obtained on GeoTracker, several up-gradient facilities in the site vicinity are identified with open and closed release cases that have impacted groundwater. The following facilities have an open release case:

- Weld-It Co. (EDR Map ID: H68, H69, H70), is listed at 4477 East Shelia Street, approximately 1,024 feet to the north and hydrologically up-gradient of the subject property. This site reported a release from a 5,000 gallon UST of gasoline and volatile organic compounds (including trichloroethylene (TCE) and perchloroethylene (PCE)) on December 10, 2003, which impacted soil and groundwater. The release was reported to the lead agency (RWQCB). The LUST case is listed as "Open-Site Assessment" as of September 19, 2008. Based on review of documents on GeoTracker, the UST was abandoned in place in 2006 and no remedial actions have been completed. The RWQCB issued a cleanup and abatement order to the property owner. Based on a 2014 groundwater monitoring report, groundwater beneath this facility has been impacted by total petroleum hydrocarbons as gasoline (TPHg), and other chemicals including TCE and PCE. The furthest downgradient monitoring wells are located within Shelia Street (across the railroad tracks to the north of the subject property). The data indicate that TPHg is present at less than 2 milligrams per liter (mg/l) in groundwater. PCE was detected in these wells at 218 and 335 micrograms per liter (µg/l). TCE was detected at 19 and 24 µg/l. Based on the isoconcentrations and groundwater contour map in the 2013 report, the impacted groundwater is moving south-southeast and would likely pass east of the subject property, not under it. Depth to groundwater is approximately 112 to 115 feet below ground surface (bgs) and flows to the south. On August 21, 2018, the RWQCB issued a Notice of Violation (NOV) to Weld-It for failing to take corrective action in response to the unauthorized UST release and monitor of groundwater (last completed in 2014). A request for an extension was request by Weld-It Company on September 26, 2018.

- Premier Plating Property (EDR Map ID: 101), is listed at 4355 East Shelia Street, 1,470 feet to the north and hydrologically up-gradient of the subject property. The facility is listed on the Los Angeles Co. HMS, FINDS, ECHO, RCRA-SQG, SEMS, SLIC, EnviroStor, HIST UST, UST, HAZNET, LA County Site Mitigation databases. Based on available information obtained on Envirostor, the site has historically been utilized as a plating facility from the 1960's through the 1980's. Premier Plating conducted a plating operation of chrome truck rims and bumpers for a period of four years. Hazardous substances such as chlorinated hydrocarbons and heavy metals were released into the soil. The release was presumably a result of onsite activities. The RWQCB provided oversight for sampling and remediation activities conducted at the site. Phase II work began in 1993 and concluded with a removal action in 1998. The RWQCB issued a "No Further Action" for soil and clean-up investigation. However, PCE contaminated perched groundwater was identified at 61 feet bgs. The EnviroStor noted that it appeared that groundwater underlying the site may have not been adequately investigated and the case status is listed as "Inactive –Action Required" as of July 18, 2002. There was no further information available.

Based on the regulatory status, these listings have the potential to impact the groundwater in the site vicinity. Based on distance from the listed sites and depth to groundwater, vapor intrusion is considered to be unlikely. Partner found no evidence that the subject property was a groundwater contaminant source.

4.2.5 Unmapped Sites

Partner reviewed EDR's Orphan Summary, which is a listing of sites that have not been geocoded based on lack of sufficient data regarding their exact location within the general area. The subject property was not identified as an Unmapped Site. None of the Unmapped Sites identified on the Orphan Summary appear to be located within the ASTM-designated radii of the subject property, and therefore, Partner has no reason to believe that these sites had an impact on the subject property.

4.3 Vapor Encroachment Screening

Partner reviewed the environmental database records identified in the EDR Radius Report and evaluated each reported site relative to a subsurface vapor encroachment condition, respective a known release, the chemicals of concern, the distance that contaminants are likely to migrate based on local geological and hydrological conditions, sub-grade utility corridors and preferential pathways, structural components, mitigation devices, and other reasonable factors.

The subsurface vapor encroachment screening was completed in conformance with ASTM International Designation: E2600-15: *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions* ("ASTM Guide E2600-15") using Tier 1 Screening procedures.

4.3.1 On-Site Sources for a Vapor Encroachment Condition

Based on a review of previous reports, agency records, and current site observations, on-site sources with the potential to create a subsurface vapor encroachment concern to the subject property and its receptors were not identified. As such, a subsurface vapor encroachment condition on the subject property relative to an on-site contaminant source does not exist.

4.3.2 Off-Site Sources for a Vapor Encroachment Condition

Based on Partner's review of the Radius Report, no off-site properties with the potential to create a subsurface vapor encroachment concern to the subject property and its receptors were identified. No off-site properties with a documented open release of petroleum hydrocarbons were identified within the critical distance - 30 feet up-gradient, cross-gradient, or down-gradient of the subject property in the Radius Report. No off-site properties with a documented release of other contaminants of concern such as chlorinated volatile organic hydrocarbons were identified within the critical distance - 100 feet up-gradient, cross-gradient, or down-gradient of the subject property in the Radius Report.

Based on the physical setting of the subject property and the findings from historical and regulatory records review, an off-site source for a subsurface vapor encroachment condition was not identified in association with the subject property. As such, a subsurface vapor encroachment condition on the subject property relative to off-site contaminant source does not exist.

5.0 USER PROVIDED INFORMATION AND INTERVIEWS

In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the Brownfields Amendments), the User must provide the following information (if available) to the environmental professional. Failure to provide this information could result in a determination that all appropriate inquiry is not complete. The user is asked to provide information or knowledge of the following:

- Environmental cleanup liens that are filed or recorded against the site.
- Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry.
- Specialized knowledge or experience of the person seeking to qualify for the LLPs.
- Relationship of the purchase price to the fair market value of the *property* if it were not contaminated.
- Commonly known or *reasonably ascertainable* information about the *property*.
- The degree of obviousness of the presence or likely presence of contamination at the *property*, and the ability to detect the contamination by appropriate assessment.
- The reason for preparation of this Phase I ESA.

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

5.1 Interviews

5.1.1 Interview with Owner

A representative of the owner of the subject property was available to be interviewed at the time of the assessment.

5.1.2 Interview with Report User

Please refer to Section 5.2 below for information requested from the Report User.

5.1.3 Interview with Key Site Manager

Ms. Ana Darino, LBA Realty property manager, indicated that she had no information pertaining to any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the subject property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or any notices from a governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products. A previous subsurface investigation was conducted, as further discussed in Section 5.2.6.

5.1.4 Interviews with Past Owners, Operators and Occupants

Interviews with past owners, operators and occupants were not reasonably ascertainable and thus constitute a data gap.

5.1.5 Interview with Others

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

5.2 User Provided Information

5.2.1 Title Records, Environmental Liens, and AULs

Partner was provided by LBA with a Commitment for Title Insurance issued by First American Title Insurance Company and dated September 21, 2021. According to the Commitment for Title Insurance, the title to the subject property is currently vested in LBA RVI-Company III, LLC, a Delaware limited liability company. No apparent environmental liens or AULs were identified for the subject property based on the review of the Commitment for Title Insurance.

5.2.2 Specialized Knowledge

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

5.2.3 Actual Knowledge of the User

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

5.2.4 Valuation Reduction for Environmental Issues

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

5.2.5 Commonly Known or Reasonably Ascertainable Information

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

5.2.6 Previous Reports and Other Provided Documentation

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

Lead-Based Paint Operations & Maintenance Program, Environmental Program Management (May 2017)

Phase I Environmental Site Assessment and Phase II Subsurface Investigation Report, 4444 East 26th Street, Vernon, California 90058, Partner Project Number: 17-201315.2, Partner Engineering and Science, Inc. (December 20, 2017)

Asbestos Operations & Maintenance Program, Environmental Program Management (January 2017)

Phase I Environmental Site Assessment, 4444 East 26th Street, Vernon, California 90058, Partner Project Number: 18-255102.1, Partner Engineering and Science, Inc. (September 10, 2018)

Phase I Environmental Site Assessment, 4444 East 26th Street, Vernon, California 90058, Partner Project Number: 20-291231.55, Partner Engineering and Science, Inc. (October 5, 2020)

In December 2017, Partner prepared a Phase I ESA and Phase II Investigation Report for the subject property. At the time of the site visit, the subject property was developed with the existing office/warehouse building on the south side of the site, a former truck repair shed used solely for storage on the northwest side of site, and a guard shack on the north side of site. The subject property was occupied by F&S Distribution, a cartage facility. Site operations included receiving and storage of products prior to pick up and distribution by various clients. The facility warehoused and distributed mainly food products (ascorbic and calcium acid, other additives, sugar, salt), household electronics, and various items such as wood chips and limestone. Floors within the former truck maintenance area were observed to be heavily stained.

Hazardous substances observed at the subject property included hydraulic, transmission, brake, and multifunctional fluid, ethylene glycol, engine coolant, urea solution, "PVC powder", and plastic materials, stored in 55-gallon drums, 5-gallon buckets, and 10-liter two-packs. Urea solution and engine coolant were stored in DOT 200-300 gallons totes, primarily on the loading dock. These items were not used onsite. According to the site manager, approximately 20 years ago F&S Distribution ceased storing hazardous materials such as oils, oxidizers, and limited solvents and paint-related materials. The site manager reported that minor spills that occurred previously were confined to the warehouse interior and were cleaned up with absorbent materials immediately.

According to City of Vernon Building Department (CVBD) records, in 1980, two USTs including a 5,000-gallon gasoline and a 10,000-gallon diesel USTs were installed at the subject property. The two USTs and an adjacent fuel dispenser were located on the northwest corner of the subject property, north of the truck repair shed. In 1986, a CVBD Fire Permit was issued to remove two USTs (5,000-gallon gasoline and 10,000-gallon diesel USTs), lines, wells, and pipes and install one modern welded 20,000-gallon plasteel tank and piping. It was noted that between 1988 and 1991, soil samples were taken, and contamination was identified that required remediation prior to installation of the new tank. Soil contamination was excavated to clean soil (depth not provided). Lab results reportedly indicated satisfactory remediation. The Vernon Health Department reportedly authorized the use of the remediated soil as backfill for the excavation. It is unclear if a new tank was installed. No other documentation related to the former USTs was identified. No laboratory data, remediation reports, or agency closure letters were identified in CVBD files.

According to a CVBD Mechanical Permit, two 4'X30' overflow seepage pits were installed at the subject property in 1980. The seepage pits were connected to an existing seepage pit and septic tank. An attached figure depicts the septic tank and three seepage pits as located adjacent to the northeast side of the building. In 1986, a Plumbing Permit indicated that a sewer lateral to the street was installed from the existing warehouse. No further information was identified regarding the septic tank and associated seepage pits.

On December 7, 2017, Partner conducted a Phase II Subsurface Investigation at the subject property to evaluate the location of on-site USTs, former tankholds, and other features and to evaluate the potential impact of petroleum hydrocarbons and VOCs to soil in the vicinity of the former UST, the truck maintenance area, former septic system, and former storage of cyanide products. The scope of the Phase II Subsurface Investigation included a geophysical survey and seven soil borings. Nineteen soil samples were analyzed for TPH-cc and VOCs, four soil samples were analyzed for CAM 17 Metals, and two soil samples were analyzed for cyanide.

Analytical results indicated:

- None of the analyzed soil samples contained detectable concentrations of TPH-cc above laboratory PQLs and the PQLs were below applicable regulatory guidelines.
- None of the detected concentrations of toluene, ethylbenzene, and m,p-xylene in soil exceeded applicable screening levels. No other VOCs were detected in any of the analyzed soil samples above applicable regulatory guidelines.
- Mercury concentrations in three soil samples exceeded background concentrations, but did not exceed applicable screening levels. Arsenic was detected above screening levels in one soil sample, but did not exceed typical background concentrations. Therefore, the concentrations of arsenic are expected to be naturally occurring. No other metals were detected in the analyzed soil samples at concentrations exceeding laboratory PQLs and/or typical background concentrations.
- None of the detected concentrations of cyanide in soil exceeded applicable screening levels.

The geophysical survey identified one anomaly in the northwestern portion of the subject property to the north of the current truck repair bays. The location and shape of the anomaly, which consisted of a backfilled excavation, generally correspond to the location of the former USTs. No large metallic features were identified within either anomaly, which confirms that the USTs have been removed and no additional USTs were installed.

Based on the geophysical survey, no additional USTs were installed on-site after the removal and remediation of the two former USTs. In addition, there did not appear to be residual impacts as a result of the removal of the two former USTs and the staining and potential septic tank did not appear to be negatively impacting the subject property at that time.

Partner recommended no further investigation with respect to the former USTs, the current truck repair bays/staining, or the former septic system at that time.

In 2017 and 2018, Environmental Program Management prepared this report on behalf of LBA Realty, LLC. According to these reports, the program is designed to maintain the potential LBP and ACMs on-site. These reports outline the implemented management practices including training activities, renovation/remodeling requirements, periodic surveillance, etc.

In 2018, Partner prepared an ESA report on behalf of LBA RVI – Company VIII, LLC. At the time of the 2018 assessment, the subject building was vacant and undergoing renovations. Renovations include demolition

of the former truck repair shed and guard shack, removal of the propane tank, reconfigure office space (northeast corner of the building) and four new restrooms, new transformer adjacent to the northwest corner of the building, new skylights and roof, and exterior paint. An open electrical trench was observed crossing the parking lot from East 26th Street to the northwest corner of the building. A railroad spur is located adjacent to the south side of the building.

No evidence of current ASTs or USTs was observed during the site reconnaissance. In 2018, one onsite AST containing propane for fueling onsite forklifts was removed on the east side of the property as part of current renovation activities. Two USTs and an adjacent fuel dispenser were formerly located on the northwest corner of the subject property.

In 2018, former truck repair shed on the northwest corner of the property was removed. In November 2017, heavy buildup of old oil was observed on the paved surface in the former truck repair shed located on the northwest corner of the property. The former truck repair shed was removed as part of current renovation activities. No drains were observed in the truck repair shed at the time of removal.

Partner identified the following HRECs and environmental issues:

- In December 2017, Partner conducted a geophysical survey and a Phase II Subsurface Investigation at the subject property to evaluate the location of former on-site UST tankholds and to evaluate the potential impact of petroleum hydrocarbons and VOCs to soil in the vicinity of the former USTs, the truck maintenance area, former septic system, and former storage of cyanide products. Based on the removal of the tanks, the geophysical survey, and the analytical results, the former USTs, truck maintenance area, septic system, and storage of cyanide products are considered a HREC and no further action is considered necessary.
- Due to the age of the subject property buildings, there was potential that asbestos-containing material (ACM) and/or lead-based paint (LBP) are present. Suspect ACMs would need to be sampled to confirm the presence or absence of asbestos prior to any renovation or demolition activities to prevent potential exposure to workers and/or building occupants. Partner recommended ACM be managed under an Operations and Maintenance (O&M) Program.

Partner recommended no further investigation.

In October 2020, Partner prepared a Phase I ESA Report for the subject property. At the time of the site visit, the subject property was developed with the existing office/warehouse building on the south side of the site. The subject property was occupied by ACCO, an HVAC equipment and installation company. Site operations included offices, warehouse/equipment storage, and equipment maintenance activities.

No evidence of the use of reportable quantities of hazardous substances was observed on the subject property. No evidence of current aboveground storage tanks (ASTs) or underground storage tanks (USTs) was observed during the site reconnaissance.

The findings of the October 2020 Phase I ESA were similar to previous reports prepared by Partner.

Partner recommended no further investigation.

Copies of reports reviewed are included in Appendix B.

6.0 SITE RECONNAISSANCE

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

Site Assessment Data

Site Assessment Performed By: Joseph Kim
Site Assessment Conducted On: October 28, 2021

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

Site Visit Personnel for 4444 East 26th Street (Subject Property)

Name	Title/Role	Contact Number	Site Walk* Yes/No
Ana Darino	Key Site Manager	(213) 507-0638	Yes

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

6.1 General Site Characteristics

6.1.1 Solid Waste Disposal

Solid waste generated at the subject property is disposed in commercial dumpsters located in the western portion of the subject property. An independent solid waste disposal contractor, Waste Management, removes solid waste from the subject property. No evidence of illegal dumping of solid waste was observed during the Partner site reconnaissance. No further investigation or corrective actions are warranted.

6.1.2 Sewage Discharge and Disposal

Sanitary discharges on the subject property are directed into the municipal sanitary sewer system operated by the City of Vernon.

6.1.3 Surface Water Drainage

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

The subject property does not appear to be a designated wetland area, based on information obtained from the United States Department of Agriculture. A comprehensive wetlands survey would be required in order to formally determine actual wetlands on the subject property. No surface impoundments, wetlands, natural catch basins, settling ponds, or lagoons are located on the subject property. No drywells were identified on the subject property.

6.1.4 Source of Heating and Cooling

Heating and cooling systems as well as domestic hot water equipment are fueled by electricity and natural gas provided by Southern California Edison (SCE) and the Southern California Gas Company.

6.1.5 Wells and Cisterns

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

6.1.6 Wastewater

Domestic wastewater generated at the subject property is disposed by means of the sanitary sewer system. No industrial process is performed at the subject property.

6.1.7 Septic Systems

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

6.1.8 Additional Site Observations

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

6.2 Potential Environmental Hazards

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

No evidence of the use of reportable quantities of hazardous substances was observed on the subject property. Small quantities of general maintenance supplies were found to be properly labeled and stored at the time of the assessment with no signs of leaks, stains, or spills. The storage and use of maintenance supplies does not appear to pose a significant threat to the environmental integrity of the subject property at this time.

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

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

6.2.3 Evidence of Releases

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

6.2.4 Polychlorinated Biphenyls (PCBs)

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

The on-site reconnaissance addressed indoor and outdoor transformers that may contain PCBs. One pad-mounted transformer was observed on the subject property. The transformer is not labeled indicating PCB content. No staining or leakage was observed in the vicinity of the transformer.

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

6.2.5 Strong, Pungent or Noxious Odors

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

6.2.6 Pools of Liquid

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

6.2.7 Drains, Sumps and Clarifiers

No drains, sumps, or clarifiers, other than those associated with storm water removal, were observed on the subject property during the site reconnaissance.

6.2.8 Pits, Ponds and Lagoons

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

6.2.9 Stressed Vegetation

No stressed vegetation was observed on the subject property.

6.2.10 Additional Potential Environmental Hazards

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

6.3 Non-ASTM Services

6.3.1 Asbestos-Containing Materials (ACMs)

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be *presumed* to contain asbestos, for purposes of this regulation. Construction materials including, but not limited to, thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building and that have not been appropriately tested may be considered "presumed asbestos-containing material" (PACM).

The subject property building was constructed in 1960. Partner has conducted a limited, visual evaluation of accessible areas for the presence of suspect ACMs at the subject property. The objective of this visual survey was to note the presence and condition of suspect ACM observed. Please refer to the table below for identified suspect ACMs:

Suspect ACMs

Suspect ACM	Location	Friable Yes/No	Physical Condition
Drywall Systems	Throughout Building Interior	No	Good
Floor Tiles	Throughout Building Interior	No	Good
Floor Tile Mastic	Throughout Building Interior	No	Good
Ceiling Tiles	Throughout Building Interior	Yes	Good
Roofing Materials	Roof	No	Not Observed

The limited visual survey consisted of noting observable materials (materials which were readily accessible and visible during the course of the site reconnaissance) that are commonly known to potentially contain asbestos.

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

6.3.2 Lead-Based Paint (LBP)

Lead is a highly toxic metal that affects virtually every system of the body. LBP is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm² (or 5,000 ug/g or 0.5% by weight) or more of lead.

Due to the commercial nature of use of the subject property, LBP was not considered within the scope of this assessment.

6.3.3 Radon

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

EPA Radon Zones

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

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

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

6.3.4 Lead in Drinking Water

According to available information, a public water system operated by the City of Vernon Public Works Water & Development Services serves the subject property vicinity. Shallow groundwater directly beneath the subject property is not utilized for domestic purposes. The sources of public water for the City of Vernon are surface water from the Metropolitan Water District of Southern California (MWD) which is a blend of Colorado River water and water from the northern State Water Project as well as groundwater pumped from local deep wells in the Central Groundwater Basin. According to the City of Vernon and the 2020 Annual Water Quality Report, water supplied to the subject property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper. Water sampling was not conducted to verify water quality.

6.3.5 Microbial Growth

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

Partner observed accessible, interior areas of the subject property building for significant evidence of microbial growth with the exceptions detailed in Section 1.5 of this report; however, this ESA should not be used as a microbial growths survey or inspection. This limited assessment was not designed to assess all areas of potential microbial growth that may be affected by microbial growth on the subject property. Rather, it is intended to give the client an indication as to whether or not conspicuous (based on observed areas) microbial growth is present at the subject property. This evaluation did not include a review of pipe chases, mechanical systems, or areas behind enclosed walls and ceilings.

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

6.4 Adjacent Property Reconnaissance

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

7.0 FINDINGS AND CONCLUSIONS

Findings

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

- Partner did not identify RECs during the course of this assessment.

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

- Partner did not identify CRECs during the course of this assessment.

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

- In December 2017, Partner conducted a geophysical survey and a Phase II Subsurface Investigation at the subject property to evaluate the location of former on-site UST tankholds and to evaluate the potential impact of petroleum hydrocarbons and VOCs to soil in the vicinity of the former USTs, the truck maintenance area, former septic system, and former storage of cyanide products. Based on the removal of the tanks with agency involvement, the geophysical survey, and the analytical results, the former USTs, truck maintenance area, septic system, and storage of cyanide products are considered a HREC and no further action is considered necessary.

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

- Partner did not identify environmental issues during the course of this assessment.

Conclusions, Opinions and Recommendations

Partner has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of 4444 East 26th Street, Vernon, Los Angeles County, California (the "subject property"). Any exceptions to or deletions from this practice are described in Section 1.5 of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the subject property. An HREC were identified. Based on the conclusions of this assessment, Partner has no recommendations for further assessment at this time.

8.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

Partner has performed a Phase I Environmental Site Assessment of the property located at 4444 East 26th Street, Vernon, Los Angeles County, California in conformance with the scope and limitations of the protocol and the limitations stated earlier in this report. Exceptions to or deletions from this protocol are discussed earlier in this report.

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

Copies of the resumes of those involved in the preparation of this report are provided in **Appendix D**.

This report has been prepared, under the responsible charge of the Environmental Professional identified below, by:

Prepared By:



Joseph Kim, CEM, CHMM
Environmental Professional

Reviewed by:



Debbie Stott, P.G.
Technical Director

9.0 REFERENCES

Reference Documents

American Society for Testing and Materials, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation: E1527-13.

Environmental Data Resources, Inc (EDR), Radius Report, October 2021

Federal Emergency Management Agency, Federal Insurance Administration, National Flood Insurance Program, Flood Insurance Map, accessed via internet, October 2021

Los Angeles County Assessor, accessed via the internet, October 2021

United States Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey, accessed via the internet, October 2021

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FIGURES

- 1 SITE LOCATION MAP**
- 2 SITE PLAN**
- 3 TOPOGRAPHIC MAP**

APPENDIX A: SITE PHOTOGRAPHS

APPENDIX B: HISTORICAL/REGULATORY DOCUMENTATION

APPENDIX C: REGULATORY DATABASE REPORT

APPENDIX D: QUALIFICATIONS
