



Phase I Environmental Site Assessment

Assessor's Parcel Numbers 625-140-08, and 626-070-33 & -57 550 Highway 75 and 624 7th Street Imperial Beach, California

Presented to:

BLUE WAVE ENTERPRISE, LLC
11273 Caminito Aclara
San Diego, California 92126

Presented by:

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July 17, 2018
Project Number: 01218158.00

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Mr. David Brienza
Manager
Blue Wave Enterprise, LLC
11273 Caminito Aclara
San Diego, California 92126

Subject: Phase I Environmental Site Assessment (Assessment)

**Site: Assessor's Parcel Numbers (APN) 625-140-08, and 626-070-33 & -57
550 Highway 75 and 624 7th Street
Imperial Beach, California 91932**

Dear Mr. Brienza:

SCS Engineers (SCS) is pleased to present this report (Report) of the Assessment of the above-described Site. This Report summarizes the results of the Assessment that was conducted for Blue Wave Enterprise, LLC (Client) in order to evaluate the Site's current environmental conditions. The work described in this Report was performed by SCS in general accordance with Exhibit 00 to the Master Services Agreement between SCS and Client for Professional Services (Contract). Exhibit 00 and the Contract were fully executed on June 29, 2018.

Because your full understanding of the Assessment is important to us, SCS recommends that you read the Report in its entirety. However, if time does not allow you a complete reading, summaries may be found in text boxes at the end of each section (pages 7, 14, and 17), and our conclusions and recommendations may be found on page 17. A glossary of terms commonly used in environmental assessments is also provided in the Appendices to this Report.

SCS enjoyed working with you on this project. Providing economical environmental solutions to meet your needs is more than our goal—it is our mission and the measure of our success. If we may assist you in any way, now or in the future, please call our office at (858) 571-5500.

Sincerely,



Harry Bishop
Project Professional
SCS ENGINEERS



Luke Montague, MESM, PG 8071
Project Manager
SCS ENGINEERS

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Department of Environmental Health Records for Properties in the Vicinity

Résumés

1 BACKGROUND

Based on conversations with Blue Wave Enterprise, LLC (Client) and a review of in-house databases, SCS Engineers (SCS) understands that 550 Highway 75 and 624 7th Street, Imperial Beach, California (Site), comprise approximately 1.3 acres that consist of vacant land with an address of 550 Highway 75, and one single-family residence (SFR) and a detached garage with an address of 624 7th Street. The Client is proposing to develop the Site with a mixed-use commercial project.

A review of the in-house ParcelQuest database of information from the San Diego County Assessor's Office provided the following information in connection with the Site.

APN	Address	Area	Description	Improvements Information
625-140-08	550 Highway 75	1.040 acres	Vacant land	N/A
626-070-33	Highway 75	0.146 acres	Vacant land	N/A
626-070-57	624 7 th Street	0.114 acres	SFR	N/A

2 STANDARDS BACKGROUND

This Assessment was conducted in general accordance with the following:

- U.S. Environmental Protection Agency (EPA), 40 Code of Federal Regulations (CFR) 312, Standards and Practices for All Appropriate Inquiries; Final Rule (AAI)
- American Society for Testing and Materials (ASTM) Standard Practice for Phase I Environmental Site Assessment Process E1527-13
- The scope, conditions, and limitations of Exhibit 00.

The Client understands that the above-referenced EPA and ASTM standards were not developed to identify all environmental risk to property. The standards were developed to allow a user (Client) to qualify for the innocent purchaser defense, bona fide prospective purchaser defense, and contiguous property owner defense to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA, a.k.a. Superfund) liability. This Assessment is intended to constitute an appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice, as part of the due diligence process required by CERCLA, the Superfund Amendments and Reauthorization Act of 1986, and the Small Business Liability Relief and Brownfields Revitalization Act of 2002 (collectively, Acts).

While this Assessment may initially qualify the Client for a CERCLA defense, after purchase, there may be continuing obligations that must be implemented in order to preserve this defense through the term of property ownership. There may be additional requirements under state law that also apply. The Client should contact qualified legal counsel regarding matters of liability, interpretation of the Acts, and potential continuing obligations. Although it is outside the scope

of this Assessment, SCS would be pleased to work with the Client's legal counsel to develop and implement a strategy to preserve the Client's CERCLA liability defenses through the term of its ownership.

This Assessment focused on potential sources of hazardous substances and petroleum products that could be considered either a recognized environmental condition,¹ controlled recognized environmental condition², or historical recognized environmental condition³, and potentially a liability due to their presence in significant concentrations (e.g., above acceptable limits set by the federal, state, or local government) or due to the potential for exposure and risk due to contaminant migration and complete exposure pathways (e.g., soil vapor inhalation or groundwater ingestion). Materials that contain substances that are not currently deemed hazardous by the EPA or the California Environmental Protection Agency were not considered as part of this Assessment.

Unless specifically included in SCS' scope of services, building materials such as asbestos, lead-based paint, urea formaldehyde, and pressure-treated lumber, as well as lead in drinking water, are not considered in this Assessment, nor are building issues such as fire safety, indoor air quality (with the possible exception of vapor intrusion), mold, or similar matters. SCS did not evaluate the Site for compliance with land use, zoning, wetlands, or similar laws. This Assessment also excludes regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, and high-voltage power lines. This Assessment is not intended to be an environmental compliance audit.

Hazardous substances occurring naturally in plants, soils, and rocks (e.g., heavy metals, naturally occurring asbestos, and radon) are not typically considered in these investigations. Similarly, construction debris (e.g., discarded concrete, asphalt) is not considered, unless obvious indications suggest that hazardous substances are likely to be present in significant concentrations or likely to migrate.

¹ *Recognized environmental conditions*, as defined by ASTM, include the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. However, the term is not intended to include *de minimis* conditions (a condition that generally does not present a threat to human health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies). A condition considered *de minimis* is not a recognized environmental condition.

² *Controlled recognized environmental condition*, as defined by ASTM, is a *recognized environmental condition* resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity use limitations, institutional controls, or engineering controls).

³ *Historical recognized environmental condition*, as defined by ASTM, is 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 (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

An evaluation of business environmental risk associated with a parcel of commercial real estate may necessitate investigation beyond that included herein.

3 OBJECTIVE

The objective of the scope of services was to assess the likelihood that recognized environmental conditions are present at the Site as a result of the current or historical Site land use or from a known and reported off-Site source.

4 SCOPE OF SERVICES

The scope of services designed and conducted to meet the objective was as follows:

- Site Reconnaissance, Site Research, Interviews, and User Requirements
- Topography, Geology, Hydrogeology, and Water Quality Survey
- Site Vicinity Reconnaissance and Off-Site Source Survey
- Historical Site and Site Vicinity Land Use Review
- Identification of Data Gaps
- Data Evaluation, Figure Preparation, and Assessment Report Preparation

SITE RECONNAISSANCE

On July 10, 2018, SCS personnel conducted a Site reconnaissance to observe and document existing Site conditions¹. The general Site location is shown in Figure 1, and a Site and Site Vicinity Plan is shown in Figure 2. Selected color photographs of the Site and Site vicinity are presented as Figures 3a through 3g.

The Site grounds and Site perimeter were systematically traversed on foot during the Site reconnaissance. Access to the single SFR and garage was not available at the time of the Site reconnaissance.

General Information

The following table summarizes general information in connection with the Site.

APNs	625-140-08, and 626-070-33 & -57
Address	550 Highway 75 and 624 7 th Street, Imperial Beach, California
Area	Approximately 1.3 acres
Site Land Use	Single-family residence and vacant land

Occupants	None (vacant land and vacant SFR)
Figure Reference	Figures 3a-1 and 3a-2

Site Buildings

The following table summarizes information in connection with the Site buildings.

Number of Buildings	2
Interpreted Construction Date	Circa 1949
Number of Stories	1
Construction Type	Wood frame, stucco-covered exterior walls, concrete slab-on-grade foundations
Figure Reference	Figures 3a-1 and 3a-2

One SFR and a garage were observed to be located on the Site parcel identified with the address of 624 7th Street on the eastern portion of the Site (Figures 3a-1 and 3a-2). The SFR was observed to be surrounded by a board fence with a locked gate on 7th Street. As noted above, access to the SFR was not available at the time of the Site visit. No indications of the presence of hazardous materials/petroleum products or hazardous waste were observed.

Site Grounds

In addition to the SFR discussed above, the Site was observed to include a vacant lot in the process of being redeveloped. Construction equipment and material was observed at various locations on the Site (Figures 3b-1 to 3d-1). Piles of what was interpreted to demolition material and cleared vegetation were observed at various locations. No indications of hazardous materials/wastes or petroleum products were observed.

Hazardous Materials / Petroleum Products

No obvious indications of the storage or use of hazardous materials and/or petroleum products were observed at the Site during the Site reconnaissance.

Hazardous Wastes

No obvious indications of the generation of hazardous wastes were observed at the Site during the Site reconnaissance.

Indications of Releases of Hazardous Materials/Wastes or Petroleum Products

No obvious indications were observed that a release of hazardous materials/wastes or petroleum products had occurred at the Site.

On-Site Utilities

Gas and Electricity	Reported to be San Diego Gas and Electric (SDG&E)
High-power Transmission Lines	None observed at or adjacent to the Site
Storm Drains	None observed to be located at the Site
Source of Heating and Cooling	Reported to be SDG&E
Potable Water Source	Reported to be supplied by the California American Water Service
Wastewater Conveyance	Reported to be operated by the City of Imperial Beach

No SDG&E transformers were observed to be located at the Site. No obvious indications of wells, cisterns, pits, sumps, dry wells, or bulk storage tanks were observed at the Site.

SITE RESEARCH

Department of Environmental Health (DEH) File Review

A review of the September 2010 DEH HMMD HE-17 database of facilities storing hazardous materials, generating hazardous wastes, and discharging unauthorized releases indicated that there is no regulatory file associated with the Site. In addition, the DEH was contactedⁱⁱ and indicated that there are no files associated with the Site.

Fire Department Records Review

The City of Imperial Beach Fire Department (IBFD) was contacted and reported that they had no hazardous materials/waste or UST records for Site.

Building Department Records Review

A request was submitted to the Imperial Beach Building Department (IBBD) for records in connection with the Site, but a response has not been received as of the date of this Report.

San Diego Air Pollution Control District (SDAPCD) Records Review

The SDAPCD was contactedⁱⁱⁱ regarding records for the Site. Ms. Cynthia Gould of the SDAPCD reported that the APCD has no records for the Site.

San Diego Industrial Wastewater Program (IWP) Records Review

The IWP was contacted^{iv} regarding records for the Site. The IWP reported that they had no records for the Site.

INTERVIEWS

The previously referenced EPA and ASTM standards require that attempts be made to conduct interviews with past and present owners and occupants of the Site to obtain information indicating recognized environmental conditions in connection with the Site. As part of this Assessment, the following contacts were either interviewed or attempts were made to conduct interviews.

Contact	Affiliation to Site	Description	Interview Date
Mr. David Brienza Manager Blue Wave Enterprise, LLC	Client and Current Site owner (550 Highway 75)	Discussed below	July 11, 2018

Mr. Brienza stated that, to his knowledge, and with the possible exception of typical construction related activities, hazardous materials and petroleum products were not used or stored at the Site and that hazardous wastes were not generated at the Site. Also, to his knowledge, there have been no releases of hazardous materials, petroleum products, and/or hazardous waste at the Site.

Mr. Brienza stated that he was not aware of environmental cleanup liens or activity and use limitations (e.g., engineering controls, deed restrictions) that have been recorded for the Site. He was not aware of pending or threatened litigation or administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Site. He was not aware of notices from governmental entities regarding possible violations of environmental laws or possible liability relating to hazardous substances or petroleum products at the Site.

USER REQUIREMENTS

In order to qualify for one of the landowner liability protections offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (discussed in the “Background” section), 40 CFR 312 requires that the user (Client) provide the following information to the environmental professional. Mr. David Brienz, Manager Blue Wave Enterprise, LLC completed the User Questionnaire on June 25, 2018. The following table summarizes the responses by the Client.

Question	Response
Have environmental cleanup liens been filed or recorded against the Site?	No
Are activity or land use limitations in place at the Site, or have they been filed or recorded in the registry?	No
Does the user have specialized knowledge or experience in connection with the Site?	No
Does the purchase price being paid for the Site reasonably reflect the fair market value of the Site?	Yes
Is the Client aware of commonly known or reasonably ascertainable information about the Site that would indicate releases or threatened releases?	No

Are there obvious indications that point to the presence of contamination at the Site?	No
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Data Gaps in Connection With Current Site Land Use

Based on observations and research, and with the possible exceptions discussed below, there are no obvious indications of data gaps in connection with the current Site land use:

- SCS was not able to interview the reported owner of the SFR reported to be part of the Site. Mr. Brienza, Manager, Blue Wave Enterprises, LLC (Client) stated that Blue Wave Enterprises is process of purchasing the property and that the escrow is expected to close next month. This data gap is not a significant data gap in our opinion based on the type of structures (SFR) and availability of other relevant information.
- Access to the SFR was not available at the time of the Site inspection. This data gap is not a significant data gap in our opinion based on the type of structures (SFR) and availability of other relevant information.
- As of the time of publication of this Report, records had not been received from the IBBD. This data gap is not a significant data gap in our opinion based on the availability of other relevant information.
- The current Site owner did not have contact information for previous owners or tenants of the Site. Additionally, SCS was unable to find contact information for previous Site owners or tenants via online searches. Therefore, interviews were not conducted with previous Site owners or tenants. This data gap is not a significant data gap in our opinion based on the availability of other relevant information.

Findings and Opinions—Current Site Land Use

Based on observations and research, it is our opinion that there are no recognized environmental conditions at the Site as a result of the current Site land use.

TOPOGRAPHY, GEOLOGY, HYDROGEOLOGY, AND WATER QUALITY SURVEY

Topography

A topographic map for the Site vicinity was reviewed and is summarized in the following table.

Reported Elevation	22 feet above mean sea level
Reported Slope Direction	Slopes down to the west
Source	United States Geological Survey 7.5 Minute Topographic Map, Imperial Beach Quadrangle, California – San Diego County, 2012

Geology

A geological map for the Site vicinity was reviewed and is summarized in the following table.

Reported Formation	Old paralic deposits, Unit 6 (Qop6)
Reported Description	Poorly sorted, moderately permeable, reddish-brown, interfingered strand-line, beach, estuarine and colluvial deposits composed of siltstone, sandstone and conglomerate.
Source	Kennedy, Michael P., and Siang S. Tan, <i>Geologic Map of the San Diego 30' × 60' Quadrangle, California</i> , California Geological Survey, 2008

Hydrogeology

Based on the DEH file review for a property located southeast of the Site at 681 Highway 75 (summarized in the 'Additional SCS Research' section below), the reported depth to groundwater at 681 Highway 75 was 22 feet below grade, and groundwater flow was reported to be generally to the west, toward the Pacific Ocean. Based on SCS' experience, groundwater elevations and gradients at the Site may be tidally influenced due to the proximity of the Pacific Ocean and San Diego Bay. Many variables influence groundwater depth and flow direction, and the actual depth and flow direction at the Site may be different from the estimates presented in this section.

Water Quality Survey

The following table summarizes the reported water quality in the Site vicinity.

Reported Hydrologic Subarea	None
Reported Hydrologic Area	Otay Valley Hydrologic Area (910.2)
Reported Hydrologic Unit	Otay Hydrologic Unit (910)
Reported Beneficial Use	Exempt from municipal use designation

SITE VICINITY RECONNAISSANCE AND OFF-SITE SOURCE SURVEY

Current Site Vicinity Conditions

The following table summarizes land use and observations in the immediate Site vicinity^v. For the purpose of this Report, the immediate Site vicinity includes those properties judged to be adjacent⁴ to the Site.

Direction	Land Use	Comments
North	Bayside Landing (MFRs) (500 Highway 75) (Figure 3e-2)	No obvious indications of the use, storage, or generation of hazardous materials/wastes or petroleum products were observed.
East	SFRs (590 to 612 7 th Street) and MFR (Figures 3f-1 and f-2) (613 7 th Street) Don Pancho's Mexican Food (690 Highway 75) (Figure 3g-1)	
South and West	Pepper Tree Apartments (650 Palm Avenue) Imperial Trailer Park (674 Palm Avenue) (Figure 3g-2)	

Environmental Regulatory Database Report

An environmental regulatory database report (Radius Map™ report^{vi}) was prepared by EDR for the Site. Local, state, and federal regulatory databases were reviewed for the Site and for those facilities within up to 1 mile of the Site. The Radius Map™ report was reported to have been prepared in general accordance with the ASTM standard for the regulatory database review for Phase I Environmental Site Assessments. The locations of the referenced facilities relative to the Site are shown on the overview maps, included in the Radius Map™ report. A description of the various databases, as well as the date each database was most recently updated, is included in the Radius Map™ report. The Radius Map™ report is included in the Appendices to this Report.

4. *Adjacent* is defined by ASTM E1527-13 as any real property or properties the border of which is contiguous or partially contiguous with that of the Site or that would be contiguous or partially contiguous with that of the Site but for a street, road, or other public thoroughfare separating them.

Based on a review of the Radius Map™ report, the following table summarizes the facilities within the selected search radii and whether the Site or a facility that was interpreted to be adjacent to the Site was listed on each database.

Federal or State Government Database	Search Radius	Number of Reported Facilities	On Site	Adjacent to the Site
National Priorities List (NPL)	1.00 mile	0	No	No
NPL Delisted	1.00 mile	0	No	No
Superfund Enterprise Management System (SEMS)	0.50 mile	0	No	No
No Further Remedial Action Planned (NFRAP)	0.50 mile	0	No	No
Resource Conservation and Recovery Act– Corrective Action (RCRA COR ACT)	1.00 mile	0	No	No
RCRA Treatment and Disposal Facilities (RCRA TSD)	0.50 mile	0	No	No
RCRA Generators (RCRA GEN)	0.25 mile	2	No	Yes
Federal Engineering and Institutional Controls (IC/EC)	0.50 mile	0	No	No
Emergency Response Notification System (ERNS)	0.12 mile	0	No	No
State/Tribal- Equivalent NPL	1.00 mile	0	No	No
State/Tribal-Equivalent CERCLIS (ENVIROSTOR)	1.00 mile	4	No	No
State/Tribal Solid Waste List (SWL)	0.50 mile	0	No	No
State/Tribal Leaking Underground Storage Tanks (LUST, San Diego County Site Assessment and Mitigation [SAM], Spills, Leaks, Investigation, and Cleanup [SLIC])	0.50 mile	19	No	Yes
State/Tribal Underground/Aboveground Storage Tanks (USTs/ASTs)	0.25 mile	2	No	No
State/Tribal Voluntary Cleanup Program (VCP)	0.50 mile	0	No	No
Federal Brownfields	0.50 mile	0	No	No
Other Haz Sites (San Diego Hazardous Materials Management Division [HMMD])	Site only	0	No	N/A
Local Lists of Hazardous Waste/Contaminated Sites (San Diego HMMD)	Site only	0	No	N/A
Local Lists of Registered Storage Tanks (Statewide Environmental Evaluation and Planning	0.25 mile	3	No	No

Federal or State Government Database	Search Radius	Number of Reported Facilities	On Site	Adjacent to the Site
System [SWEEPS UST], Historic UST, CA Facility Inventory Database [FID] UST)				
Local Land Records (DEED)	0.50 mile	0	No	No
Other (Notify 65, RCRA NonGen, HAZNET)	0.12 mile	0	No	No
EDR High Risk Historical Records (Historic Auto, Historic Cleaner, Manufactured Gas Plant [MGP])	0.125 mile	4	No	Yes

N/A = Not applicable

The Site was not listed on any of the regulatory databases reviewed.

Off-Site facilities listed in the RadiusMap™ report were evaluated as to their potential to impact the Site. The databases included in the Radius Map™ report can be grouped into two general categories: databases reporting unauthorized releases of hazardous substances or petroleum products (e.g., LUSTs, RCRA COR ACT facilities, National Priorities List [a.k.a. Superfund] sites) and databases reporting permitted hazardous materials users and hazardous waste generators for which a release has not been reported to, and recorded by, the regulatory agency.

SCS evaluated each of the off-Site facilities listed in the Radius Map™ report as to their potential to impact the Site, based on the following factors:

- Reported distance of the facility from the Site⁵
- The nature of the database on which the facility is listed, and/or whether the facility was listed on a database reporting unauthorized releases of hazardous materials, petroleum products, or hazardous wastes
- Reported case type (e.g., soil only, failed UST test only)
- Reported substance released (e.g., chlorinated solvents, gasoline, metals)
- Reported regulatory agency status (e.g., case closed, “no further action”)

⁵ Based on State Water Resources Control Board’s “Technical Justification for Groundwater Media-Specific Criteria,” (Groundwater Study) (April 2012), developed to support the State of California “Low Threat Closure Policy” (adopted May 2012), “plume length studies recognize that petroleum plumes stabilize in length due to natural attenuation.” The Groundwater Study goes on to cite Shih T., Y. Rong, T. Harmon, and M. Suffet, 2004, “Evaluation of the impact of fuel hydrocarbons and oxygenates on groundwater resources” (Environmental Science & Technology. Vol. 38, No. 1: 42-48) that a peer-reviewed study of plume lengths at 500 petroleum UST sites in the Los Angeles area is widely accepted as representative of plume lengths at California UST sites. Shih et al. reports methyl tertiary butyl ether (MTBE), with 90th percentile maximum plume lengths of 540 feet. Therefore, the detailed review radius for open groundwater cases has been conservatively established by SCS at 0.20 mile (approximately 1,000 feet). For non-release cases (e.g., permitted facilities), only those facilities that were judged to be immediately adjacent to the Site were interpreted to have the potential to represent a recognized environmental condition.

- Location of the facility with respect to the reported groundwater flow direction and depth to groundwater (discussed in the “Hydrogeology” section of this Report)

Based on one or more of the factors listed above, and with possible exceptions discussed in the Additional SCS Research section below, there is a low likelihood that the off-Site facilities listed in the Radius Map™ report represent a recognized environmental condition in connection with the Site.

EDR listed two facilities as being “orphans,” which are facilities for which EDR does not have sufficient information to accurately locate them on a map. Based on a review of the orphans, it is interpreted that none of the facilities are within the requisite search radii for their reported database listings.

Additional SCS Research

H110911 - 674 Palm Avenue – AB Brite Cleaners (Approximately 200 feet south)

A dry cleaner identified as AB Brite Cleaners and Laundries at 674 Palm Avenue is situated approximately 200 feet south of the Site, and is listed on the HAZNET and RCRA-SQG databases. This facility is listed on the HAZNET database as using halogenated liquid. Based on a review of city directories, this dry cleaning facility has reportedly been located at 674 Palm Avenue for approximately 51 years (from 1967 to present).

Based on its listing on the RadiusMap™ report and the proximity of this facility to the Site, the DEH files for this facility reviewed. The following table summarizes the Compliance Inspection Report (CIR) dates, hazardous wastes reported to be generated, and violations of the hazardous waste control law.

Years Listed	Hazardous Waste (Quantities)	Violations
1996, 1998, 1999, 2000, 2004, 2005, 2007, 2008, 2009, 2010, 2011, 2012	Waste tetrachloroethylene (PCE) filters	Record keeping, hazardous waste containers not properly labeled

The CIRs indicate that administrative violations were received for failure to maintain disposal records for waste filters and for lacking adequate labeling for drums of hazardous wastes. The violations were corrected by AB Brite Cleaners and documented by the DEH. Based on our experience, dry cleaning facilities used and store tetrachloroethylene (PCE); generate waste such as still bottoms and used filters; and often experienced releases to the soil, soil vapor, and/or groundwater. Although, based on available data, there are no known and reported releases in connection with this facility, in our experience, over time, PCE liquid and vapor have the ability to permeate flooring and building foundations, entering the subsurface soils and potentially impacting groundwater. It is not known what time frame is required for this to occur. Many property owners and lenders have established a Phase II sampling “trigger” of 5 to 7 years (i.e., dry cleaning facilities in operation over 5 years are subject to Phase II subsurface testing for the

presence of PCE), and in some cases, as little as 2 years. While it is unclear from the available data, SCS believes that there is the potential for subsurface impacts, including groundwater (reported to be approximately 22 feet below grade), given the tendency for PCE to migrate through flooring and building foundations.

Based on the interpreted distance from the Site (approximately 200 feet), the reported regulatory oversight of this facility and the lack of known and reported releases from this facility, the reported depth to groundwater (22 feet below grade), and location with respect to the reported groundwater flow direction (cross gradient), there is a low likelihood that a recognized environmental condition exists at the Site in connection with the listing of this facility on the HAZNET and RCRA-SQG database.

H26463-001 - 600 Palm Avenue – Silver Strand Plaza (southwest of the Site)

Silver Strand Plaza is located adjacent to the southwest of the Site at 600 Palm Avenue, and based on its listing in the LUST and San Diego County Site Assessment and Mitigation program databases; the DEH file for this facility was reviewed.

A gasoline service station was historically present at 600 Palm Avenue between 1966 and 1980 and was the site of a UST release discovered in 1988. Based on a review of historic aerial photographs, the former gasoline service station is interpreted to have been located at the northeast corner of the intersection of Palm Avenue and Rainbow Drive, approximately 500 feet south of the Site. The DEH files for this facility include technical reports, letters, and memorandums related to the release. The letters and reports indicate that gasoline was discovered leaking during the removal of four USTs (three gasoline and one waste oil) at the former gasoline station site. This release was reported to regulatory agencies on March 3, 1988, although the time period and the amount of gasoline released are unknown. After testing showed elevated levels of petroleum hydrocarbons were present in the soil; twenty one 55-gallon drums of gasoline-impacted soil and groundwater were removed from the site during the cleanup phase of the facility remediation.

A letter dated March 24, 1988, issued by the DEH, stated that the technical reports submitted by Applied Geoscience and American Engineering regarding site characterization activities were reviewed and discussed with the Regional Water Quality Control Board (RWQCB). Based on the DEH and RWQCB review, the facility did not require further mitigation and that no further action was required at that time.

Based on the low reported concentrations of petroleum hydrocarbons left-in-place at this facility, the case closed status, the interpreted distance of this facility to the Site (approximately 500 feet), depth to groundwater (approximately 22 feet below grade), and the cross-gradient position of this facility relative to the Site with respect to groundwater flow direction, there is a low likelihood that a recognized environmental condition exists at the Site in connection with the listing of this facility on the HAZNET database.

H05459-002 - 681 Highway 75 – Mobile Station (southeast of the Site)

The 681 Highway 75 facility identified as a Mobil gasoline service station is listed on the HAZNET, LUST, UST, SLIC, and San Diego SAM regulatory databases. On December 2, 1987, one 280-gallon UST was removed and one 550-gallon UST was installed at this facility. A report titled, *Preliminary Environmental Site Assessment, Mobil Service Station/ SS # 18-FPL, 681 Highway 75, Imperial Beach, California*, dated April 13, 1989, and prepared by Owen Consultants (OC) was completed for the property. It was reported by OC that groundwater is approximately 22 feet below grade and flows generally to the west.

Based on the absence of additional regulatory oversight of the property and the interpreted distance of this facility to the Site (approximately 230 feet), depth to groundwater (approximately 22 feet below grade), and the cross-gradient position of this facility relative to the Site with respect to groundwater flow direction, there is a low likelihood that a recognized environmental condition exists at the Site in connection with the listing of this facility on the regulatory databases.

California Division of Oil and Gas

SCS personnel reviewed the California Division of Oil and Gas Map regarding oil and gas well locations within 1 mile of the Site^{vii}. There were no wells interpreted to be located within a 1-mile radius of the Site.

DATA GAPS IN CONNECTION WITH OFF-SITE SOURCES

Based on the Site vicinity reconnaissance and off-Site source survey, there are no obvious indications of data gaps in connection with off-Site sources.

Findings and Opinions—Off-Site Source Survey

Based on the off-Site source survey, several facilities in the Site vicinity were reported to have had releases of hazardous materials/waste or petroleum products. However, it is our opinion that there are no recognized environmental conditions at the Site as a result of known and reported releases of hazardous materials/wastes or petroleum products from an off-Site source. This opinion is based on one or more of the following: reported regulatory status (e.g., case closed), media affected (e.g., soil contamination only), distance from the Site, direction from the Site with respect to reported groundwater flow direction, and information obtained through a review of County of San Diego Department of Environmental Health files.

HISTORICAL LAND USE REVIEW

In accordance with the ASTM Standard and AAI rule, numerous reasonably ascertainable standard historical information sources were reviewed, and an attempt was made to interpret the historical Site and Site vicinity land use back to the obvious first developed use of the Site. The following table summarizes the historical resources reviewed as part of this Assessment.

Resource	Source	Years Available
Aerial Photographs	NETR Online (http://www.historicaerials.com) Google Earth	1928, 1948, 1953, 1964, 1980, 1989, 1994, 1996, 2000, 2001, 2002, 2003, 2004, 2005, 2007, 2008, 2009, 2010, 2012
City Directories	San Diego Central Library	1965, 1970, 1975, 1980, 1985, 1990, 1995, 2000, 2005, 2010
Sanborn Fire Insurance Maps	In-House Collection	None were available for the Site
Topographic Maps	In-House Collection	1904, 1930, 1943, 1996
Building Department Records	IBBD	Not provided
Fire Department Records	IBFD	Not provided
Interviews	Not applicable	Discussed in the "Interviews" section above

Historical Site Land Use

The following table provides a chronology of the apparent historical Site land uses, as interpreted from a review of information from the sources referenced.

Year	Interpreted Site Tenants	Interpreted Site Use
1904-1953	Unknown	No improvements shown (Site land use not specified on the topographic maps reviewed)
1964-2012	Various	Hotel and SFR
2013-2017	None	Vacant lot and SFR
2018	None	Under development and SFR

Because many of the dates listed above are based on a limited selection of historical resources, they are considered to be approximations only; the actual beginning/ending dates for many of the Site uses listed above may have been earlier or later than indicated.

No obvious historical facilities, features of concern, or land uses indicative of the use, storage, or generation of hazardous materials/wastes or petroleum products were found in the historical resources reviewed.

Historical Site Vicinity Land Use

The following table provides a chronology of the apparent historical Site vicinity land uses as interpreted from a review of information from the sources referenced.

Years	Interpreted Site Vicinity Tenants	Interpreted Site Vicinity Use
500 Highway 75 (North)		
1904	Unknown	No improvements shown (Site land use not specified on the topographic maps reviewed)
1928	Unknown	Agricultural
1953	Vacant	None
1964-1975	Silver Strand Mobile Village	Residential
1980 -2017	Bernardo Shores RV Park	Residential
2017 -2018	Bayside Landing (MFRs)	Residential
590 to 612 7th Street (East)		
1904	Unknown	No improvements shown (Site land use not specified on the topographic maps reviewed)
1928	Unknown	Agricultural
1953-2018	Various residences	SFRs
650 Palm Avenue (South)		
1904	Unknown	Agricultural or vacant land
1928	Unknown	Agricultural
1953	Unknown	Residential
1966-1980	No address listed	Unknown
1985-1990	Palm Apartments	Residential
1995-2018	Pepper Tree Apartments, various residential tenants	Residential
674 Palm Avenue (South)		
1904	Unknown	No improvements shown (Site land use not specified on the topographic maps reviewed)
1928	Unknown	Agricultural
1953	Unknown	Residential
1965	The Imperial Trailer Park/ Spotless Cleaners and Laundry	Commercial/Residential

Years	Interpreted Site Vicinity Tenants	Interpreted Site Vicinity Use
1967-1980	Coin-Op Laundry and Dry Cleaner Equipment Sales/The Imperial Trailer Park/Spotless Cleaners and Laundry	Commercial/Residential
1980-2018	The Imperial Trailer Park/ A B Brite Cleaners and Laundry	Commercial/Residential

Because many of the dates listed above are based on a limited selection of historical resources, they are considered to be approximations only; the actual beginning/ending dates for many of the Site vicinity uses/development described above may have been earlier or later than indicated.

No obvious historical facilities, features of concern, or land uses indicative of the use, storage, or generation of hazardous materials/wastes or petroleum products were found in the historical resources reviewed.

Data Gaps in Connection With the Historical Site Land Use

Readily available historical information was limited, and information was not available that would provide 5-year data intervals between 1904 and 1928 and 1930 and 1943. Based on the corroborating data from the historical information reviewed, we judged it likely that the historical Site land use during this time period was not significantly different from our interpretation presented in the table above. The year the Site was first developed (for hotel and SFR use) is interpreted to have been prior to 1964.

Findings and Opinions—Historical Site and Site Vicinity Land Use

Based on a review of historical resources, it is our opinion that there are no recognized environmental conditions at the Site as a result of a release of hazardous materials/wastes or petroleum products from a known or interpreted historical Site or Site vicinity land use.

5 CONCLUSION

SCS has performed an Assessment of 550 Highway 75 and 624 7th Street, Imperial Beach, California (Site), in general conformance with the ASTM Standard Practice for Phase I Environmental Site Assessment Process E 1527-13 and the EPA, 40 CFR 312, Standards and Practices for All Appropriate Inquiries, Final Rule (AAI). Any exceptions to, or deletions from, the ASTM and AAI Scope of Work were previously described in this Report where applicable.

This Assessment has revealed no evidence of a recognized environmental condition in connection with the Site.

This Assessment has been conducted by an environmental professional whose qualifications⁶ were made known to the Client. The conclusion presented above is based on the review of readily available data obtained as part of this Assessment, current regulatory guidelines, the Site and Site vicinity reconnaissance, and SCS' experience.

6 REPORT USAGE AND FUTURE SITE CONDITIONS

This Report is intended for the sole usage of the Client and other parties designated by SCS. The methodology used during this Assessment was in general conformance with the requirements of the Client and the specifications and limitations presented in the Consulting Agreement (Contract) between the Client and SCS. This Report contains information from a variety of public and other sources, and SCS makes no representation or warranty about the accuracy, reliability, suitability, or completeness of the information. Any use of this Report, whether by the Client or by a third party, shall be subject to the provisions of the Contract between the Client and SCS. Any misuse of or reliance upon the Report shall be without risk or liability to SCS.

Assessments are qualitative, not comprehensive, in nature and may not identify all environmental problems or eliminate all risk. For every property, but especially for properties in older downtown or urban areas, it is possible for there to be unknown, unreported recognized environmental conditions, USTs, or other features of concern that might become apparent through demolition, construction, or excavation activities, etc. In addition, the scope of services for this project was limited to those items specifically named in the scope of services for this Report. Environmental issues not specifically addressed in the scope of services for this project are not included in this Report.

Land use, condition of the properties within the Site, and other factors may change over time. The information and conclusions of this Report are judged to have been relevant at the time the work described in this Report was conducted. This Report should not be relied upon to represent future Site conditions unless a qualified consultant familiar with the practice of Phase I Environmental Site Assessments in the County of San Diego is consulted to assess the necessity of updating this Report.

The property owners at the Site are solely responsible for notifying all governmental agencies and the public of the existence, release, or disposal of any hazardous materials/wastes or petroleum products at the Site, whether before, during, or after the performance of SCS' services. SCS assumes no responsibility or liability for any claim, loss of property value, damage, or injury that results from hazardous materials/wastes or petroleum products being present or encountered within the Site.

Although this Assessment has attempted to assess the likelihood that the Site has been impacted by a hazardous material/waste release, potential sources of impact may have escaped detection

6. SCS declares that, to the best of its professional knowledge and belief, the reviewer meets the definition of Environmental Professional as defined in section 312.10 of 40 CFR 312 and has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. SCS has developed and performed All Appropriate Inquiries in conformance with the standards and practices set forth in 40 CFR 312. The qualifications of the report preparers are included in the Appendices.

for reasons that include, but are not limited to, (1) inadequate or inaccurate information rightfully provided to SCS by third parties, such as public agencies and other outside sources; (2) the limited scope of this Assessment; and (3) the presence of undetected, unknown, or unreported environmental releases.

7 SPECIAL CONTRACTUAL CONDITIONS BETWEEN USER AND ENVIRONMENTAL PROFESSIONAL

There were no special contractual conditions between the user of this Assessment, the environmental professional, and SCS.

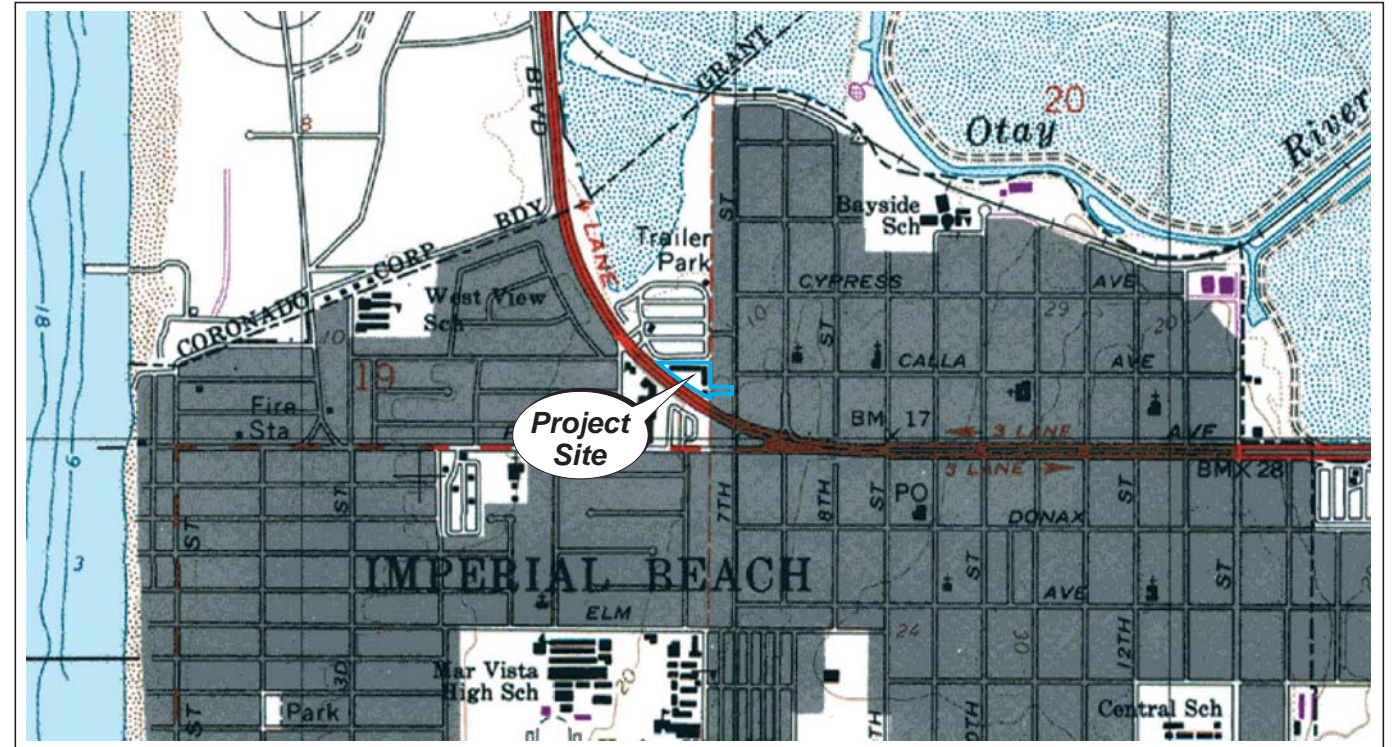
8 ENDNOTES

-
- i. Site reconnaissance conducted by Harry Bishop (SCS) on July 10, 2018.
 - ii. Records request—County of San Diego Department of Environmental Health by Harry Bishop (SCS) on July 10, 2018.
 - iii. Records request—San Diego County Air Pollution Control District (SDAPCD) by Harry Bishop on July 10, 2018.
 - iv. Records request—City of San Diego Industrial Waste Program by Harry Bishop on July 10, 2018.
 - v. Site vicinity reconnaissance conducted by Harry Bishop (SCS) on July 10, 2018.
 - vi. EDR, “Radius Map™ Report,” unpublished report prepared for Site address, dated July 13, 2018.
 - vii. California Division of Oil, Gas, and Geothermal Resources Online Mapping System, <http://maps.conservation.ca.gov/doms/doms-app.html>.

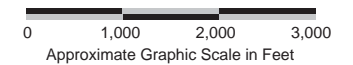
FIGURES



REGIONAL SITE LOCATION



2-DIMENSIONAL SITE LOCATION

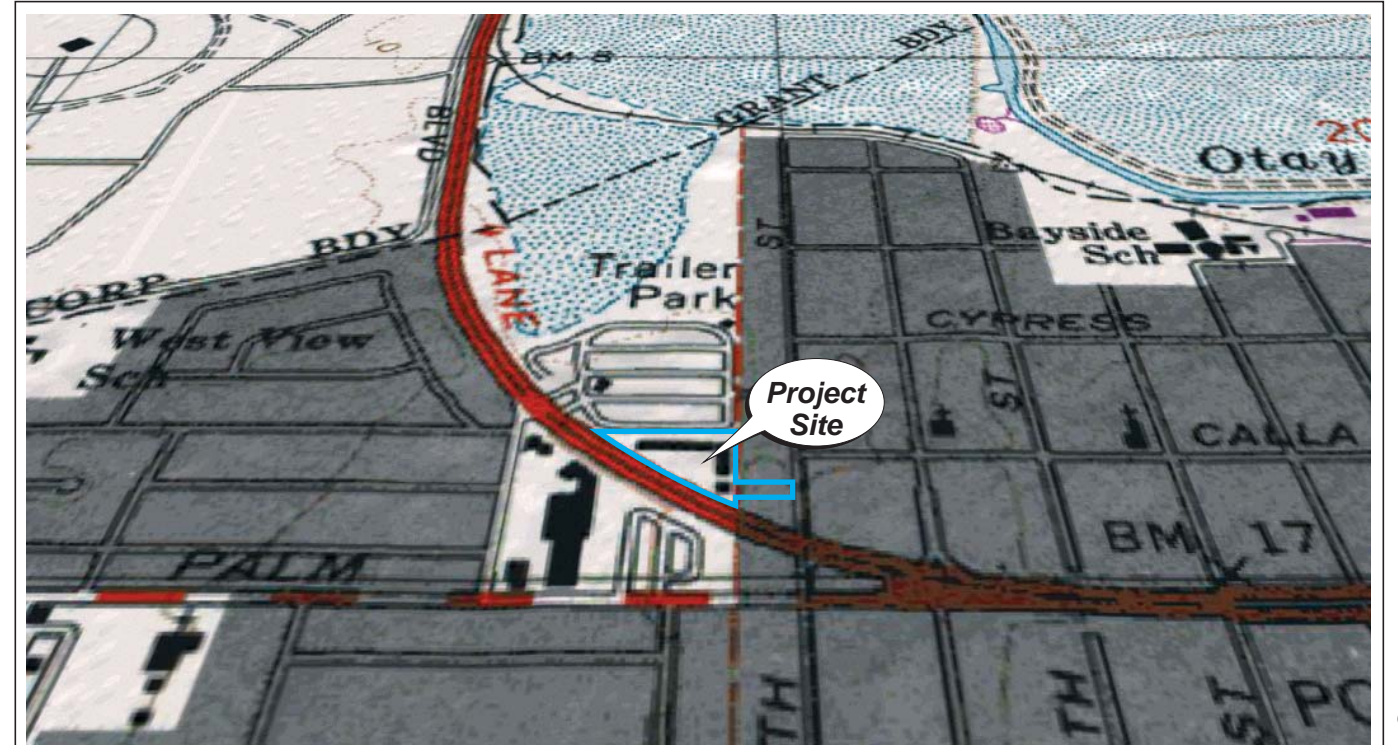


Reference:
U.S.G.S. 7.5 Minute Quadrangle Map
Imperial Beach, California



SITE AERIAL PHOTOGRAPH

Reference:
Google Earth Aerial Photograph
Imperial Beach, California - November 2016



3-DIMENSIONAL SITE LOCATION

Reference:
U.S.G.S. 7.5 Minute Quadrangle Map
Imperial Beach, California

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FOUR-WAY SITE LOCATION MAP
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
01218158.00

Figure 1

Date Drafted:
7/13/18

Disclaimer: This figure is based on available data. Actual conditions may differ. All locations and dimensions are approximate.



LEGEND

- Approximate Site boundary
- Location and direction of Site photograph

Reference: Google Earth Aerial Photograph
Imperial Beach, California - November 2016

Disclaimer: This figure is based on available data. Actual conditions may differ. All locations and dimensions are approximate.

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SITE AND SITE VICINITY PLAN
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
01218158.00

Figure 2

Date Drafted:
7/13/18



1) View of vacant portion of the Site looking northwest.



2) View of vacant portion of the Site looking north.

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PHOTOGRAPHIC PLATE
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
01218158.00

Figure 3a

Date Drafted:
7/13/18



1) View of vacant portion of the Site looking east.



2) View of typical construction equipment on vacant portion of Site.

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PHOTOGRAPHIC PLATE
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
01218158.00

Figure 3b

Date Drafted:
7/13/18



1) View of typical soil piles on vacant portion of Site.



2) View of typical debris piles on vacant portion of Site.

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PHOTOGRAPHIC PLATE
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
01218158.00

Figure 3c

Date Drafted:
7/13/18



1) View of typical debris piles on vacant portion of Site.



2) View of single-family residence.

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PHOTOGRAPHIC PLATE
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
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Figure 3d

Date Drafted:
7/13/18



1) View of single-family residence.



2) View of the adjacent property to the north of vacant portion of the Site.

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PHOTOGRAPHIC PLATE
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
01218158.00

Figure 3e

Date Drafted:
7/13/18



1) View of the adjacent property to the east of vacant portion of the Site.



2) View of the adjacent property to the east of single-family residences.

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PHOTOGRAPHIC PLATE
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
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Project No.:
01218158.00

Figure 3f

Date Drafted:
7/13/18



1) View of the adjacent property to the southeast of the Site.



2) View of the adjacent property to the south of the Site.

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PHOTOGRAPHIC PLATE
Blue Wave Enterprise, LLC
550 Highway 75 and 624 7th Street
Imperial Beach, California

Project No.:
01218158.00

Figure 3g

Date Drafted:
7/13/18

APPENDICES

GLOSSARY

adjoining property. Any real property the border of which is contiguous or partially contiguous with that of the Site, or that would be contiguous or partially contiguous with that of the Site but for a street, road, or other public thoroughfare separating them.

aerial photographs. Photographs taken from an airplane or helicopter of areas encompassing the Site.

asbestos. Six naturally occurring fibrous minerals found in certain types of rock formations. Of the six, the minerals chrysotile, amosite, and crocidolite have been the most commonly used in building products. When inhaled in sufficient quantities, asbestos fibers can cause serious health problems.

asbestos-containing material (ACM). Any material or product that contains more than 1% asbestos.

construction debris. Any concrete, brick, asphalt, and other building materials discarded in the construction of a building or other improvement to property.

de minimis condition. An environmental condition that does not generally present a material risk of harm to the public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

drum. A container (typically, but not necessarily, holding 55 gallons of liquid) that may be used to store hazardous substances or petroleum products.

dry well. Underground areas where soil has been removed and replaced with pea gravel, coarse sand, or large rocks. Dry wells are used for drainage, to control storm runoff, for the collection of spilled liquids (spilled intentionally or not), and for wastewater disposal (often illegal).

fill dirt. Dirt, soil, sand, or other earth that is obtained off site and that is used to fill holes or depressions, create mounds, or otherwise artificially change the grade or elevation of real property. It does not include material that is used in limited quantities for normal landscaping activities.

fire insurance map. Maps produced for private fire insurance map companies that indicate uses of properties at specified dates and that encompass the property.

hazardous material. Any material that, because of its quantity, concentration, or physical and chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous waste, and any material which a handler or the administering agency has a reasonable basis for believing would be injurious to the health or safety of persons or harmful to the environment if released into the workplace or the environment.

hazardous substance. Pursuant to CERCLA, hazardous substances include the following:

- 1) All toxic pollutants and hazardous substances listed under the Clean Water Act
- 2) Hazardous wastes regulated under RCRA
- 3) Any hazardous air pollutant under the Clean Air Act
- 4) Chemicals designated as “immediately hazardous” under the Toxic Substance Control Act

The EPA is also allowed to designate additional substances as hazardous if they present a substantial danger to the public health or welfare or the environment when released.

hazardous waste. A substance defined pursuant to the Solid Waste Disposal Act amended by RCRA, a hazardous waste is a solid waste, or a combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics, may contribute to an increase in mortality or an increase in serious irreversible, or incapacitating illness or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.

landfill. A place or area of land used for the disposal of solid wastes as defined by state solid waste regulations. Synonymous with the term *solid waste disposal site*, a landfill is also known as a garbage dump or trash dump.

likelihood. As used in this Report, the term *likelihood* pertains to the probability of a match between the prediction of an event and its actual occurrence. As used by SCS Engineers, the term *low likelihood* approximates a percentage range to 10 to 20 percent; *moderate likelihood* approximates 40 to 60 percent; and *high likelihood* approximates 80 to 90 percent.

Material Safety Data Sheet (MSDS). Written or printed material concerning a hazardous substance which is prepared by chemical manufacturers, importers, and employers for hazardous chemicals pursuant to OSHA standards.

obvious. That which is plain or evident. The term refers to a condition or fact that could not be ignored or overlooked by a reasonable observer while physically observing the property.

PCE. Perchloroethene/perchloroethylene, or “Perc”; also tetrachloroethene/tetrachloroethylene; commonly used as a solvent for dry-cleaning.

petroleum products. Petroleum, including crude oil, natural gas, natural gas liquids, liquefied natural gas, synthetic gas usable for fuel, kerosene, diesel oil, jet fuels, motor oil, hydraulic oil, gear oils, and fuel oil.

recognized environmental conditions (RECs). Recognized environmental conditions, as defined by the American Society for Testing and Materials (ASTM), include the presence or likely presence of hazardous substances or petroleum products on a property that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water on the property. However, the term is not intended to include de minimis conditions that do not generally present a material risk of harm to the public health or the environment and that generally would not be subject to an enforcement action if brought to the attention of appropriate governmental agencies.

retail quantities (RQs). Quantities of hazardous materials usually less than 50 gallons, 100 pounds, or 200 cubic feet of gas (under the regulatory reporting limits).

small retail quantities (SRQs). Quantities of hazardous materials in containers of 5 gallons or less, and less than 50 gallons in aggregate.

solvent. A chemical compound that is capable of dissolving another substance and is itself a hazardous substance, such as TCE, TCA, PCE, Stoddard solvent, paint thinner, mineral spirits, and acetone. Solvents are used in a number of manufacturing or industrial processes.

TCA. Trichloroethane; also 1,1,1 TCA; a commonly used industrial solvent for degreasing/cleaning.

underground storage tank (UST). Any tank, including underground piping connected to the tank, that is

or has been used to contain hazardous substances or petroleum products and the volume of which is 10 percent or more beneath the surface of the ground.

visually and/or physically observed. This term refers to observations made by vision during the Site visit while walking through the Site or Site building(s), and observations made by the sense of smell, particularly awareness of noxious or foul odors.

ACRONYMS

:g/kg	micrograms per kilogram
:g/L	micrograms per liter
ARAR	Applicable, Relevant, and Appropriate Requirements
ASPIS	Abandoned Sites Program Information System
APCD	Air Pollution Control District
ASHRAE	American Society of Heating, Refrigerating and Air-Conditioning Engineers
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
BAT	Best Available Technology
bg	below grade
bgs	below ground surface
BMP	Best Management Practice
BTEX	benzene, toluene, ethylbenzene, and xylenes
Cal-EPA	California Environmental Protection Agency
CCDC	Centre City Development Corporation
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CGI	Combustible Gas Indicator
CHSP	Community Health and Safety Plan
CIR	Compliance Inspection Report
CoCs	Constituents of Concern
CPT	Cone Penetration Testing
DAF	Dilution and Attenuation Factor
DDT	Dichlorodiphenyltrichloroethane
DEED RSTR	California Department of Health Services Deed Restriction
DEH	County of San Diego Department of Environmental Health
DTSC	Department of Toxic Substance Control
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment

FoPC	Features of Potential Concern
HMMD	Hazardous Materials Management Division, County of San Diego
HVAC	heating, ventilation, and air conditioning
HVOCs	halogenated volatile organic compounds
HWSSL	Hazardous Waste and Substances Sites List
IDW	investigation-derived wastes
IPM	integrated pest management
JURMP	Jurisdictional Urban Runoff Management Program
LEL	lower explosive limit
LESA	Limited Environmental Site Assessment
LNAPL	Light Nonaqueous Phase Liquid
LOA	Letter of Authorization
LUFT	leaking underground fuel tank
LUST	leaking underground storage tank
mg/kg	milligrams per kilogram
MIWD	Metropolitan Industrial Wastewater Division
MSCP	Multiple Species Conservation Plan
MSDS	Material Safety Data Sheet
MTBE	methyl tertiary butyl ether; <i>also</i> methyl tert-butyl ether
NA	not applicable
NCP	National Contingency Plan
ND	not detected
NESSHAPS	National Emissions Standards for Hazardous Air Pollutants
NFA	no further action
NFRAP	No Further Remedial Action Plan
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
OLS	ordinary least squared
OSHA	Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PCE	perchloroethene/perchloroethylene, <i>or</i> "Perc"; <i>also</i> tetrachloroethene/tetrachloroethylene
PEAR	Preliminary Environmental Assessments Required
PID	photoionization detector
PMP	Property Mitigation Plan
PAHs	polynuclear aromatic hydrocarbons
PRG	Preliminary Remediation Goals
PRP	potentially responsible party (pursuant to CERCLA)
PSH	phase-separated hydrocarbons

QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
RCRA VIOL	Comprehensive Environmental Response, Compensation and Liability Act–hazardous waste generators violations/enforcement actions
RCRIS-G	Comprehensive Environmental Response, Compensation, and Liability Act Information System–Generators (hazardous waste)
REC	recognized environmental condition
RF	remote fill
RNA	remediation by natural attenuation
RQs	retail quantities
RWQCB	Regional Water Quality Control Board
SAM	Site Assessment and Mitigation Program (San Diego County Department of Environmental Health)
SAP	Site Assessment Protocol
SCL	Department of Toxic Substance Control database
SDG&E	San Diego Gas and Electric
SI	site inspection
SRQs	small retail quantities
SMP	Soil Management Plan
SPCC	Spill Prevention Control and Countermeasure
STLC	Soluble Threshold Limit Concentration
SWAT	Solid Waste Assessment Test
SWIS	Solid Waste Information System
SWLF	Solid Waste Landfills
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCA	Trichloroethane; also 1,1,1 TCA
TCE	trichloroethene; trichloroethylene
TCLP	Toxicity Characteristic Leaching Procedure
THF	Tetrahydrofuran
TPH	total petroleum hydrocarbons
TPHg	TPH as gasoline
TPHd	TPH as diesel
TPHext	TPH extended range
TPHo	TPH oil range
TRIS	Toxic Release Information System
TRPH	total recoverable petroleum hydrocarbons
TTLCS	Total Threshold Limit Concentrations
UAR	unauthorized release
USGS	United States Geological Survey
UST	underground storage tank

VAP	Voluntary Action Plan
VES	Vapor Extraction System
WDR	Waste Discharge Requirements
WET	Waste Extraction Test
WMUDS	Waste Management Unit Database System

COUNTY OF SAN DIEGO DEPARTMENT OF ENVIRONMENTAL
HEALTH (DEH) RECORDS FOR THE SITE
