

DECEMBER 6, 2010

**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

7777 WEST 11TH STREET
TRACY, CALIFORNIA 9

AEI PROJECT No. 293000

PREPARED FOR

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PREPARED BY



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EXECUTIVE SUMMARY

AEI Consultants (AEI) was retained by Piedmont Lumber & Mill Company, Inc. to conduct a Phase I Environmental Site Assessment (ESA), in conformance with the scope and limitations of ASTM Standard Practice E1527-05 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) for the property located at 7777 West 11th Street in the City of Tracy, San Joaquin County, California. Any exceptions to, or deletions from, this practice are described in Section 1.3 of this report.

PROPERTY DESCRIPTION

The subject property is located on the north side of West 11th Street in a mixed commercial and light industrial area of Tracy. The property totals approximately 4.91 acres and is improved with one (1) one-story concrete block building (3,000 square feet) and one pole barn building (3,000 square feet). Both structures are currently vacant. The subject property was most recently used by Piedmont Lumber for wooden truss manufacturing and storage. The subject property is currently vacant. Recent on-site operations included a lumber cutting and related lumber storage yard operated by Piedmont Lumber & Mill Company, Inc. In addition to the subject property buildings, the property is improved with one domestic well (inactive) and asphalt-paved parking areas.

The property was developed with the current concrete block building in 1957 or prior and the current pole barn building in approximately 1972. Based on a review of historical sources, the subject property was formerly occupied by the following tenants: wooden truss manufacturing and storage by Piedmont Lumber & Mill Company (approximately 1996-2009), auto towing/tire service (1987-1990), agricultural row crops (1957), auto storage/dismantling/junk yard (1952-1995) and a vacant field (prior to 1939).

The subject property was also referred to as "7777 West Eleventh Street" by the County of San Joaquin, and "7777 East 11th Street" street by PG&E, therefore both spelling versions and street name directions were researched during historical document review.

The subject property was identified in the regulatory database as a closed Leaking Underground Storage Tank (LUST) site, and is further discussed in Section 5.0.

The immediately surrounding properties consist of the following:

North	Union Pacific owned railroad tracks (1399 North Chrisman Road)
South	West 11 th Street, followed by La Movida club (7740 West 11 th Street)
Southeast	West 11 th Street, followed by Tri State Rock & Ready Mix, A Rose Bookkeeping, Recycled Treasures (7750 West 11 th Street)
Southwest	West 11 th Street, followed by Bill's Mower & Saw, Cathy Anne Party Rental (7834 West 11 th Street)
East	Pallet King, Inc. (7675 West 11 th Street)
West	Morgan's Cen-Cal Supply (7831 West 11 th Street)

The adjacent site to the east was identified in the regulatory database as a Resource Conservation and Recovery Act (RCRA) Small-Quantity Generator (SQG) site, an underground storage tank (UST) site, and open LUST site, and is further discussed in Section 5.0.

The following sites, (not technically adjacent, yet beyond West 11th Street to the south) were identified in the regulatory database as the following and are further discussed in Section 5.0:

- "Tracy Equipment Rental" (7840 Eleventh) - UST
- "Signal Hill Properties" (7750 Eleventh) – UST

Based upon *Case Closure Summary – 7777 West 11th Street, Tracy* (SJCEHD, RWQCB, December 24, 1999), the direction of groundwater flow beneath the subject property is calculated to be to the north - northwest, and present at depth ranging from 6.5 - 10 feet below ground surface (bgs).

FINDINGS

Recognized Environmental Conditions (RECs) are defined by the ASTM Standard Practice E1527-05 as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. AEI's investigation has revealed the following recognized environmental conditions associated with the subject property or nearby properties:

- No on-site recognized environmental conditions were identified during the course of this investigation

Historical Recognized Environmental Conditions (HRECs) are defined by the ASTM Standard Practice E1527-05 as an environmental condition which in the past would have been considered a recognized environmental condition, but which may or may not be considered a recognized environmental condition currently. AEI's investigation has revealed the following historical recognized environmental conditions associated with the subject property or nearby properties:

- The subject property was formerly equipped with one (1) 350-gallon gasoline fuel UST. During excavation activities, the UST was encountered and subsequently removed on July 19, 1996 and two soil samples were collected one foot below the bottom of the tank. The installation date of the tank is unknown and was likely used to fuel forklifts or other machinery during the occupancy by auto dismantling/repair and/or towing or junk yard businesses. Total Petroleum Hydrocarbons as diesel (TPHd), Total Petroleum Hydrocarbons as gasoline (TPHg), and benzene, toluene, ethylbenzene, and xylene (BTEX) constituents were detected in concentrations ranging from 5.9 ppm to 4,300 ppm. Based on the laboratory results, Hoblitzel & Assoc. recommended additional characterization and remediation. The excavation pit was reportedly left open for approximately one year.

In November 1997, John P. Cummings & Associates (JPCA) conducted a *Phase II Report* on the subject property. Laboratory results indicated that the soil in the upper five feet had minor concentrations of hydrocarbons. Oxygenates were not detected in soil samples. JPCA recommended that the first five feet of soil from the former UST area be removed and that four quarters of groundwater monitoring would be necessary.

Four groundwater monitoring wells were installed in November 1997. Quarterly groundwater monitoring was performed until March 1999 when JCPA recommended regulatory case closure based on low concentrations of COCs.

In December 1999, the San Joaquin County Environmental Health Department (SJCEHD) and Regional Water Quality Control Board (RWQCB) issued a No Further Action (NFA) letter for the LUST case. The analytical results of the COCs detected in soil, before and after excavation and monitoring are as follows (listed in ppm): TPHg (4,300/1.5), Toluene (78/0.013), Benzene (7.5/0.012), Ethylbenzene (82/0.016), Xylene (400/0.048), TPHd (870/n/a), MTBE (n/a / ND). The analytical results of the constituents of concern (COCs) detected in groundwater, before and after excavation and monitoring are as follows (listed in ppb): TPHg (690/ND), Toluene (22/ND), Benzene (19/5.5), Ethylbenzene (17/1.1), TPHd (NA/ND), MTBE (ND/4.3). Based on the case closed status, no further action is required by the SJCEHD or RWQCB regarding the former subject property LUST case.

- The subject property was historically used for auto dismantling/repair, tow yard and as a junk yard from at least 1952 to 1990. In April 1996, Smith Environmental Technologies (SET) performed soil sampling throughout the subject property in a grid fashion comprised of 16 sections (sampled at a depth of 2 ft bgs). Analytical data indicated that there were areas of petroleum-contaminated surface soil adjacent to the north of the former UST concrete slab and in the "I" and "J" grid sections (all were below RWQCB regulatory Environmental Screening Levels (ESLs) for shallow soil where groundwater is a potential drinking water source). Metals were detected in all the samples at uniform concentrations that are typical background concentrations. SET concluded that "based upon field observations and analytical results... it appear[ed] that these surface spills [were] minor and limited, as only low concentrations of petroleum hydrocarbons were detected in two to three of the grid sections." SET recommended soil excavation in the vicinity of the former UST pad (which was completed during subsequent UST removal). Based on the laboratory results (COCs detected below ESLs), the long-term historical use of the subject property as a auto dismantling/repair, tow yard and as a junk yard represents a historical recognized condition and no further investigation is warranted at this time.

Environmental Issues include environmental concerns identified by AEI that warrant discussion but do not qualify as recognized environmental conditions, as defined by the ASTM Standard Practice E1527-05. AEI's investigation has revealed the following environmental issues associated with the subject property or nearby properties:

- The northern portion of the subject property was historically developed as agricultural row crop fields in 1957. There is a potential that agricultural chemicals, such as pesticides, herbicides and fertilizers, were used onsite. The entire area of the subject property is either paved over or covered by improvements that make direct contact with any potential remaining concentrations in the soil unlikely. Furthermore, the subject property is developed and used for commercial/light industrial purposes and thus no further action related to the former agricultural use of the subject property is warranted at this time.
- AEI Consultants observed interior areas of the subject buildings in order to identify the significant presence of mold. During the on-site reconnaissance, obvious visual signs of mold growth or conditions conducive for mold growth were observed on ceiling of the southwestern corner of the concrete block building. Based upon the amount of fungal

growth observed, AEI recommends that remediation clean-up of visible mold be conducted within the affected area, which should include but not be limited to the following:

- Remediation/clean-up shall be conducted using a mild disinfectant by onsite staff utilizing N95 dust masks and gloves, and
- All mold affected building materials, as well as used gloves and masks, shall be disposed of in sealed plastic bags.

Repairs to prevent water intrusion and damage in the impacted area should also be performed. In addition, in order to assist onsite staff with proper methods of mold growth evaluation and remediation, as well as proper training for onsite maintenance personnel, it would be prudent for the property owner to implement a Mold/Moisture Plan (MMP).

- Due to the age of the concrete block subject property building (constructed prior to 1952), there is a potential that asbestos-containing materials (ACMs) are present. During the site inspection the following damaged materials were observed: four removed and two damaged ceiling tiles, and one 5'x20' section of damaged floor tiles. Based on the potential presence of ACMs, AEI recommends the property owner implement an Operations and Maintenance (O & M) Plan which stipulates that the assessment, repair and maintenance of damaged materials be performed to protect the health and safety of the building occupants.
- Due to the age of the concrete block subject property building (constructed prior to 1952), there is a potential that lead-based paint (LBP) is present. During the site inspection damaged paint surfaces were observed in the southwestern corner of the building. Based on the potential presence of LBP, AEI recommends the property owner implement an O & M Plan which stipulates that the assessment, repair and maintenance of damaged painted surfaces be performed to protect the health and safety of the building occupants. Local regulations may apply to lead-based paint in association with building demolition/renovations and worker/occupant protection. Actual material samples would need to be collected or an XRF survey performed in order to determine if LBP is present. It should be noted that construction activities that disturb materials or paints containing *any amount* of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.
- An inactive domestic drinking water supply well was observed on the eastern side of the subject property during the site reconnaissance. The depth of the well was reported to be approximately 80 feet bgs. According to the site representative, Mr. Richard Wheeler, the well was installed between 2000 and 2002 and was briefly used for providing water for the adjacent property to the east (7675 West 11th Street). The subject property does not have plumbing. The well was most recently used for the onsite fire system until September 2010. The presence of the well is considered an environmental issue because wells represent a conduit to the subsurface. Although small quantities of hazardous materials and petroleum products were previously stored onsite, these materials were reportedly not stored in the immediate vicinity of the well. Therefore, the presence of the well is not expected to represent a significant environmental concern. However, AEI recommends that the on-site well be properly decommissioned or tested for potability should the subject property owner wish to use the well for drinking water purposes in the future.

- AEI observed one (1) 55-gallon drum located adjacent to the southwestern corner of the concrete block building during site reconnaissance. Neither AEI, nor Mr. Wheeler were able to confirm the contents of the drum. No staining or evidence of release of any of the materials was observed. Based on the lack of a documented release, and the lack of evidence of the mismanagement, the presence of the drum is not expected to represent a significant environmental concern. However, as a best management practice, the drum should be removed from the subject property and properly disposed of.
- AEI observed two capped steel pipes located within the drainage ditch on the southern property boundary, bordering West 11th Street. The pipes were observed to be rusted or welded shut at the time of the site reconnaissance. Mr. Wheeler reported that the pipes were part of a former network of pipes that ran along West 11th Street at the subject property and adjacent property to the east that were utilized as fence posts and cable anchorage. Based on this information and the location of the pipes right along the road, it appears unlikely that these pipes are/were associated with underground features such as a UST; therefore, the pipes are not expected to represent a significant environmental concern.

CONCLUSIONS, OPINIONS AND RECOMMENDATIONS

We have performed a Phase I Environmental Site Assessment for the property located at 7777 West 11th Street in the City of Tracy, San Joaquin County, California, in conformance with the scope and limitations of ASTM Standard Practice E1527-05 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312). Any exceptions to, or deletions from, this practice are described in Section 1.3 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property. AEI recommends no further investigations for the subject property at this time.

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1.0 INTRODUCTION

This report documents the methods and findings of the Phase I Environmental Site Assessment (ESA) performed in conformance with the scope and limitations of ASTM Standard Practice E1527-05 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) for the property located at 7777 West 11th Street in the City of Tracy, San Joaquin County, California (Figure 1: Site Location Map, Figure 2: Site Map, and Appendix A: Property Photographs).

1.1 SCOPE OF WORK

The purpose of the Phase I Environmental Site Assessment is to identify potential environmental liabilities associated with the presence of hazardous materials, their use, storage, and disposal at and in the vicinity of the subject property, as well as regulatory non-compliance that may have occurred at the subject property. Property assessment activities focused on: 1) a review of federal, state, tribal and local databases that identify and describe underground fuel tank sites, leaking underground fuel tank sites, hazardous waste generation sites, and hazardous waste storage and disposal facility sites within the ASTM approximate minimum search distance; 2) a property and surrounding site reconnaissance, and interviews with the past and present owners and current occupants and operators to identify potential environmental contamination; and 3) a review of historical sources to help ascertain previous land use at the site and in the surrounding area.

The goal of AEI Consultants in conducting the environmental site assessment was to identify the presence or likely presence of any hazardous substances or petroleum products on the property that may indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum product into the soil, groundwater, or surface water of the property.

1.2 SIGNIFICANT ASSUMPTIONS

The following assumptions are made by AEI Consultants in this report. AEI Consultants relied on information derived from secondary sources including governmental agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, and personal interviews. AEI Consultants has reviewed and evaluated the thoroughness and reliability of the information derived from secondary sources including government agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, or personal interviews. It appears that all information obtained from outside sources and reviewed for this investigation is thorough and reliable. However, AEI cannot guarantee the thoroughness or reliability of this information.

Groundwater flow and depth to groundwater, unless otherwise specified by on-site well data, or well data from adjacent sites are assumed based on contours depicted on the United States Geological Survey topographic maps. AEI Consultants assumes the property has been correctly and accurately identified by the client, designated representative of the client, property contact, property owner, and property owner's representatives.

1.3 LIMITATIONS

Property conditions, as well as local, state, tribal and federal regulations can change significantly over time. Therefore, the recommendations and conclusions presented as a result of this study apply strictly to the environmental regulations and property conditions existing at the time the study was performed. Available information has been analyzed using currently accepted assessment techniques and it is believed that the inferences made are reasonably representative of the property. AEI Consultants makes no warranty, expressed or implied, except that the services have been performed in accordance with generally accepted environmental property assessment practices applicable at the time and location of the study.

Considerations identified by ASTM as beyond the scope of a Phase I ESA that may affect business environmental risk at a given property include the following: asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, mold, vapor intrusion, and high voltage lines. These environmental issues or conditions may warrant assessment based on the type of the property transaction; however, they are considered non-scope issues under ASTM Standard Practice E1527-05.

If requested by the client, these non-scope issues are discussed in Section 7.2. Otherwise, the purpose of this investigation is solely to satisfy one of the requirements for qualification of the innocent landowner defense, contiguous property owner or bona fide prospective purchaser under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). ASTM Standard Practice E1527-05 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) constitute the "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in:

- 1) 42 U.S.C § 9601(35)(B), referenced in the ASTM Standard Practice E1527-05.
- 2) Sections 101(35)(B) (ii) and (iii) of CERCLA and referenced in the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312).
- 3) 42 U.S.C. 9601(40) and 42 U.S.C. 9607(q).

The Phase I Environmental Site Assessment is not, and should not be construed as, a warranty or guarantee about the presence or absence of environmental contaminants that may affect the property. Neither is the assessment intended to assure clear title to the property in question. The sole purpose of investigation into property title records is to ascertain a historical basis of prior land use. All findings, conclusions, and recommendations stated in this report are based upon facts, circumstances, and industry-accepted procedures for such services as they existed at the time this report was prepared (i.e., federal, state, and local laws, rules, regulations, market conditions, economic conditions, political climate, and other applicable matters). All findings, conclusions, and recommendations stated in this report are based on the data and information provided, and observations and conditions that existed on the date and time of the property visit.

Responses received from local, state, or federal agencies or other secondary sources of information after the issuance of this report may change certain facts, findings, conclusions, or circumstances to the report. A change in any fact, circumstance, or industry-accepted procedure upon which this report was based may adversely affect the findings, conclusions, and recommendations expressed in this report.

1.4 LIMITING CONDITIONS

The following limiting condition was identified during the course of this investigation:

- Pursuant to ASTM E1527-05, in order to qualify for one of the Landowner Liability Protections offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001, the report User must provide the information (if available) presented in the *ASTM User Questionnaire* to the environmental professional. Failure to provide this information could result in a determination that "all appropriate inquiry" was not completed. Based on the quality of information provided from other sources (interviews, environmental health records, aerial photographs, etc.) this limitation is not expected to alter the overall findings of this investigation.

1.5 DATA GAPS AND DATA FAILURE

According to ASTM E1527-05, data gaps occur when the Environmental Professional is unable to obtain information required, despite good faith efforts to gather such information.

Data failure is one type of data gap. According to ASTM E1527-05 "data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met". Pursuant to ASTM Standards, historical sources are required to document property use back to the property's first developed use or back to 1940, whichever is earlier.

The following data failure was identified during the course of this investigation:

- On November 15, 24 & 29, 2010 and December 6, 2010 the San Joaquin County Office of Emergency Services (SJCOS) was contacted for information on the subject property to identify any evidence of previous or current hazardous material usage. The SJCOS maintains Incident Reports which date back to the mid-1980s.

Pursuant to ASTM Standard E1527 Section 7.1.4.2, information that is obtainable within a reasonable time frame is information that will be provided by the source within 20 calendar days of receiving a public information request. Based on the over 20 day processing time and lack of agency response, records from this agency are not considered reasonably ascertainable. However; based on the quality of information obtained from other sources, this limitation not expected to significantly alter the findings of this investigation. Any incident reports or Hazardous Material Management Plans (HMMPs) would likely also be on file with the SCJEHD.

1.6 RELIANCE

This investigation was prepared for the sole use and benefit of Piedmont Lumber & Mill Company, Inc. Neither this report, nor any of the information contained herein shall be used or

relied upon for any purpose by any person or entity other than Piedmont Lumber & Mill Company, Inc.

2.0 SITE AND VICINITY DESCRIPTION

2.1 SITE LOCATION AND DESCRIPTION

The subject property is located on the north side of West 11th Street in a mixed commercial and light industrial area of Tracy. The property totals approximately 4.91 acres and is improved with one (1) one-story concrete block building (3,000 square feet) and one pole barn building (3,000 square feet). Both structures are currently vacant. The subject property was most recently used by Piedmont Lumber for wooden truss manufacturing and storage. The subject property is currently vacant. Recent on-site operations included a lumber cutting and related lumber storage yard operated by Piedmont Lumber & Mill Company, Inc. In addition to the subject property buildings, the property is improved with one domestic well (inactive) and asphalt-paved parking areas.

The subject property was identified in the regulatory database as a closed LUST site, and is further discussed in Section 5.0.

The Assessor's Parcel Number (APN) for the subject property is 250-140-11. The subject property does not have natural gas services. Electricity service is provided by Pacific Gas & Electric (PG&E). No potable water or sewage disposal services are currently available at the subject property.

Refer to Figure 1: Site Location Map, Figure 2: Site Map, and Appendix A: Property Photographs for site location.

2.2 SITE AND VICINITY CHARACTERISTICS

The subject property is located in a mixed commercial and light industrial area of CITY. The immediately surrounding properties consist of the following:

North	Union Pacific owned railroad tracks (1399 North Chrisman Road)
South	West 11 th Street, followed by La Movida club (7740 West 11 th Street)
Southeast	West 11 th Street, followed by Tri State Rock & Ready Mix, A Rose Bookkeeping, Recycled Treasures (7750 West 11 th Street)
Southwest	West 11 th Street, followed by Bill's Mower & Saw, Cathy Anne Party Rental (7834 West 11 th Street)
East	Pallet King, Inc. (7675 West 11 th Street)
West	Morgan's Cen-Cal Supply (7831 West 11 th Street)

The adjacent site to the east was identified in the regulatory database as a RCRA-SQG, UST and open LUST site, and is further discussed in Section 5.0.

The following sites, (not technically adjacent, yet beyond West 11th Street to the south) were identified in the regulatory database as the following and are further discussed in Section 5.0:

- "Tracy Equipment Rental" (7840 Eleventh) - UST
- "Signal Hill Properties" (7750 Eleventh) – UST

2.3 GEOLOGY AND HYDROGEOLOGY

According to information obtained from the US Geological Survey (USGS), the area surrounding the subject property is underlain by Great Valley Fan Deposits of the Pleistocene-era. Based on a review of the United States Department of Agriculture (USDA) Soil Survey for the area of the subject property, the soils in the vicinity of the subject property are classified as "Capay-Urban land complex." Soils from this series are characterized as moderately well drained and having 0-2 percent slopes.

Based on a review of the USGS Tracy Quadrangle Topographic Map, the subject property is situated approximately 48 feet above mean sea level, and the local topography is relatively flat. The nearest surface water is an un-named wetland (area not mapped by FEMA), which overlaps onto the northeastern corner of the subject property. Based upon *Case Closure Summary – 7777 West 11th Street, Tracy* (SJCEHD, RWQCB, December 24, 1999), the direction of groundwater flow beneath the subject property is calculated to be to the north - northwest, and present at depth ranging from 6.5 - 10 feet below ground surface (bgs).

3.0 HISTORICAL REVIEW OF SITE AND VICINITY

3.1 HISTORICAL SUMMARY

Reasonably ascertainable standard historical sources as outlined in ASTM Standard E1527-05 were used to determine previous uses and occupancies of the subject property that are likely to have led to recognized environmental conditions in connection with the subject property. A chronological summary of historical data found, including but not limited to aerial photographs, historic city directories and Sanborn fire insurance maps and building department records is as follows:

Date Range	Source(s)	Subject Property Description/Use
Prior to 1939	Prior Phase 1 ESA (JCPA, 1999)	Empty field
1952-1995	Environmental Health Department documents, building department documents, city directories, aerial photographs, interviews, previous Phase 1 ESA	Auto storage/dismantling/junk yard
1957	Aerial photograph	Agricultural row crops (portion)
1987-1990	Previous Phase 1 ESA, city directories	Auto towing/tire service
1996-2009	Environmental Health Department documents, aerial photographs, interviews	wooden truss manufacturing and storage (Piedmont Lumber & Mill Company)
2010	Site reconnaissance, interviews	Vacant industrial property owned by Piedmont Lumber & Mill Company

According to historical sources, the property was developed with the current concrete block building in 1957 or prior and the current pole barn building in approximately 1972. Prior to the construction of the buildings, the subject property was formerly occupied by the following tenants: wooden truss manufacturing and storage by Piedmont Lumber & Mill Company (approximately 1996-2009), auto towing/tire service (1987-1990), agricultural row crops (1957), auto storage/dismantling/junk yard (1952-1995) and a vacant field (prior to 1939).

In April 1996, Smith Environmental Technologies (SET) performed soil sampling throughout the subject property in a grid fashion comprised of 16 sections (sampled at a depth of 2 ft bgs). Analytical data indicated that there were areas of petroleum-contaminated surface soil adjacent to the north of the former UST concrete slab and in the "I" and "J" grid sections (all were below RWQCB regulatory Environmental Screening Levels (ESLs) for shallow soil where groundwater is a potential drinking water source). Metals were detected in all the samples at uniform concentrations that are typical background concentrations. SET concluded that "based upon field observations and analytical results... it appear[ed] that these surface spills [were] minor and limited, as only low concentrations of petroleum hydrocarbons were detected in two to three of the grid sections." SET recommended soil excavation in the vicinity of the former UST pad (which was completed during subsequent UST removal). Based on the laboratory results (COCs detected below ESLs), the long-term historical use of the subject property as a auto dismantling/repair, tow yard and as a junk yard represents a historical recognized condition.

If available, copies of historical sources are provided in the report appendices.

3.2 AERIAL PHOTOGRAPH REVIEW

On December 6, 2010, AEI Consultants reviewed aerial photographs of the subject property and surrounding area. Aerial photographs were reviewed for the following years:

Date: 1957 Scale: 1"=750'	Date: 2004 Scale: n/a
Date: 1972 Scale: 1"=750'	Date: 2005 Scale: n/a
Date: 1987 Scale: 1"=750'	Date: 2006 Scale: n/a
Date: 1993 Scale: 1"=750'	Date: 2010 Scale: n/a
Date: 1998 Scale: 1"=750'	

In the 1957 aerial photograph, the southern third of the subject property contains the current concrete block building surrounded by what appears to be automobiles stored on a dirt area. There appears to be a shed with additional stored automobiles near the southeastern corner of the property. The remaining northern two-thirds of the property appears developed as agricultural row crops. The current drainage ditch appears along the southern property boundary. The adjacent properties appear developed as the following: railroad tracks (north), West 11th Street, followed by industrial buildings with surrounded auto/miscellaneous storage (south, southeast, southwest), commercial building with agricultural row crops (east) and commercial building with storage yard (west).

In the 1972 aerial photograph, both of the current concrete block and pole barn structures appear. Two sheds appear on the western property boundary. The entire parcel is occupied as a dirt lot with vehicle storage. The present day large commercial building and sheds appear on the adjacent property to the east. The adjacent property to the west appears developed with a small commercial building on a grass lot. No significant changes were noted on the remaining adjacent properties to the north, south, southeast or southwest.

No significant changes were noted on the subject property or adjacent properties in the 1987 aerial photograph. It should be noted that the image quality of the photograph is poor, therefore making detailed observation impossible.

In the 1993 aerial photograph, no significant changes were noted on the subject property or adjacent properties to the north, south, southwest, southeast or west. The adjacent property to the east appears to contain lumber piles in addition to the pre-existing commercial structures.

In the 1998 aerial photograph, the pole barn and concrete block structures remain. The remainder of the property appears as a vacant, dirt lot. The adjacent property to the west appears as a vacant, dirt lot. No significant changes were noted on the remaining adjacent properties to the north, south, southwest, southeast or east.

In the 2004 aerial photograph, the current subject property structures remain. Lumber piles are scattered throughout the property. The property appears to be asphalt paved. A commercial building with storage yard appears on the adjacent property to the west. No significant changes were noted on the remaining adjacent properties to the north, south, southwest, southeast or east.

No significant changes were noted on the subject property or adjacent properties in the 2005 or 2006 aerial photographs.

In the 2010 aerial photograph, the current subject property structures appear a vacant weathered asphalt lot. The northeastern corner of the property appears to overlap onto a small marsh. The subject property and surrounding properties are developed as they are today.

Copies of reviewed aerial photographs are included as Figure 3.

3.3 SANBORN FIRE INSURANCE MAPS

Sanborn Fire Insurance maps were developed in the late 1800s and early 1900s for use as an assessment tool for fire insurance rates in urbanized areas. A search was made of Seattle Public Library's online collection of Sanborn Fire Insurance maps on November 11, 2010.

Sanborn map coverage was not available for the subject property.

3.4 CITY DIRECTORIES

A search of historic city directories was conducted for the subject property at the Stockton Public Library – Main Branch on November 19, 2010. Directories were available and reviewed for the years 1956-2009 (West San Joaquin Valley Haines 1971-2009 and Tracy Polks 1956-1967) and were reviewed in approximately five-year increments. The following table summarizes the results of the city directory search.

City Directory Search Results

Year(s)	Occupant Listed
1956, 1961, 1963, 1967, 1971, 1975, 1980	Address not listed
1981, 1983, 1985, 1987	National Automobile Club, California State Auto Association
1987, 1990	Reed & Son Towing Service
1993, 1995	Reed & Son Auto Dismantling, Capitol Auto Repair
1998, 2000, 2002	XXXX (valid address with no occupancy information provided)
2005, 2009	Address not listed

City directory review indicated that the subject property was occupied by the following businesses: automobile club (1981-1987), towing service (1987-1990) and auto dismantling/repair (1993-1995).

Subject property occupancy as a towing service and automobile dismantling/repair is further in Sections 3.1 and 4.1.1.

4.0 REGULATORY AGENCY RECORDS REVIEW

4.1 REGULATORY AGENCIES

Local and state agencies, such as environmental health departments, fire prevention bureaus, and building and planning departments are contacted to identify any current or previous reports of hazardous materials use, storage, and/or unauthorized releases that may have impacted the subject property. In addition, information pertaining to Activity and Use Limitations (AULs), defined as legal or physical restrictions, or limitations on the use of, or access to, a site or facility, is requested. Specifically AULs are comprised of engineering controls (EC) and institutional controls (IC).

Engineering Controls are defined as physical modifications to a site or facility to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the property. *Institutional Controls* are defined as a legal or administrative restriction on the use of, or access to, a site or facility to 1) reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil or ground water on the 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.

4.1.1 HEALTH DEPARTMENT

On November 30, 2010, the San Joaquin County Department of Environmental Health (SJCDEH) was visited to review files on the subject property and nearby sites of concern. Files at the SJCDEH may contain information regarding hazardous materials storage, as well as information regarding unauthorized releases of petroleum hydrocarbons or other contaminants that may affect the soil or groundwater in the area. Please refer to the following table for a listing of documents reviewed:

Subject Property

Environmental Health Department Documents Reviewed 7777 West 11th Street

Year(s)	Tenant	Document Type	Description of Document
10/1988	Piedmont Lumber	SJCEHD Permit	Replacement of pump for historical domestic water well
1/1990	Capitol Auto Wrecking	San Joaquin County Business License Application	<ul style="list-style-type: none"> - Business noted to be a likely small quantity generator - Stored waste oil, gasoline, anti-freeze in barrels under county permit - Had a private septic system (noted to be 50 feet downgradient of water well) and private well. Was not connected to city sewer, or water. - Stated that there was no USTs located onsite
3/1996	Piedmont Lumber	<i>Draft Phase 1 ESA</i> (Smith Environmental Technologies)	<ul style="list-style-type: none"> - Report was performed for the purpose of the property transfer from previous owner, Mila Padilla, to Piedmont Lumber. - Ms. Padilla owned the property since 1989 and began operating Capitol Auto Wrecking onsite since 1990. The property was also used as a wrecking yard, towing/tire service and vacant lot. From 1975-1990, the property was used as an auto wrecking yard. In 1952, the southern portion of the property was used for the storage of automobiles. The entire parcel was noted to be an empty field in 1940. - At the time of the inspection, the property contained the two current structures, a cargo containers, two scrap metal/railroad timber piles, water supply well, and septic tank/leach field (located between the two buildings). No USTs were known to exist on the property; however SET noted a suspect hydraulic lift (likely the same location as the historical 350-gallon UST) adjacent to the northwest of the cinder block building. No stained soil was observed onsite. The property appeared to be unmaintained with some debris (auto parts, empty motor oil containers, glass). No sumps or pits were observed. - SET recommended the following: shallow soil samples (analyzed for TPH, BTEX, metals) be advanced throughout the property, inspection of historical domestic well and septic system, inspection of suspect hydraulic lift, removal of railroad timbers, and inquiry with PG&E regarding PCB content in observed stained transformer. No figures accompanied this report

Year(s)	Tenant	Document Type	Description of Document
4/1996	Piedmont Lumber	<i>Phase II Environmental Site Assessment</i> (Smith Environmental Tech.)	<ul style="list-style-type: none"> - Smith Environmental Tech. (SET) performed soil sampling throughout the subject property in a grid fashion comprised of 16 sections (sampled at a depth of 2 ft bgs). - Analytical data indicated that there were areas of petroleum contaminated surface soil adjacent to the north of the former UST concrete slab and in the I and J grid sections (all were below RWQCB regulatory ESLs for shallow soil where groundwater is a potential drinking water source). - Metals were detected in all the samples at uniform concentrations that are typical background concentrations. - "Based upon field observations and analytical results... it appear[ed] that these surface spills [were] minor and limited, as only low concentrations of petroleum hydrocarbons were detected in two to three of the grid sections." - SET recommended soil excavation in the vicinity of the former UST pad
5/1996	Piedmont Lumber	Correspondence	Subject property owner's law firm informs SJCEHD that the historical onsite UST may have been used for forklift fueling when the property was formerly used as a scrap yard.
6/1996	Piedmont Lumber	UST Permit Application Form A	- Noted to be a "permanently closed" UST site
6/1996	Piedmont Lumber	SJCEHD UST Removal Application	- Removal of one 350-gallon gasoline fuel UST (date of installation unknown)
7/1996	Piedmont Lumber	San Joaquin County Fire Department Permit	- Removal of UST
8/1996	Piedmont Lumber	<i>Environmental Investigation Report</i> (Hoblitzel & Assoc.)	<ul style="list-style-type: none"> - Site excavation revealed one UST (approximately 500-gallons in size). - On July 19, 1996 the UST was removed and two soil samples were collected one foot below the bottom of the tank. TPHd, TPHg, and BTEX were detected in concentrations ranging from 5.9 ppm – 4,300 ppm. - Based on the laboratory results Hoblitzel & Assoc. recommended additional characterization and remediation
11/1997	Piedmont Lumber	<i>Phase II Report</i> (JCPA)	- Lab results indicated that the soil in the upper five feet had minor concentrations of hydrocarbons. Oxygenates were not detected in soil samples. JCPA recommended that the first five feet of soil from the former UST area be removed and that four quarters of groundwater monitoring would be necessary

Year(s)	Tenant	Document Type	Description of Document
8/1998	Piedmont Lumber	SJCEHD Well Destruction Permit	Permit for destruction of historical onsite domestic well (located directly adjacent to the northeast of the cinder block building)
3/1999	Piedmont Lumber	<i>1st Quarterly Monitoring Report for 1999</i> (JCPA)	- Based on the low concentrations of COCs, case closure was recommended
5/1999	Piedmont Lumber	<i>File Closure Report</i> (JCPA)	- Soil samples collected from the bottom of the excavation at the time of removal were analyzed for TPHg, and BTEX. - Four monitoring wells were constructed in November 1997. Soil in the upper five feet had minor concentrations of hydrocarbons. No oxygenates were detected in the soil samples. - Groundwater contained < 1 ppm TPHg and 20 ppb benzene. One sample from MW-3 contained 5.6 ppb of MTBE. Remaining groundwater samples contained no detectable concentrations (< 5ppb) of oxygenates. - No TPHG, BTEX nor oxygenates were found in water sample collected from the historical potable water well. The well was destroyed in March 1998. - JCPA recommends for case closure
7/1999	Piedmont Lumber	Unauthorized Release Form (URF)	- 1 x 350-gallon gasoline fuel encountered and removed 7/19/1996. - Product leak due to tank corrosion
10/1999	Piedmont Lumber	Inter-Office Memo	- Adjacent site to the east, 7675 West 11 th Street (open LUST case) supplied drinking water to the subject property. Subject property potable well was destroyed under permit in 1998
11/1999	Piedmont Lumber	SJCEHD Well Destruction Permit	- Four onsite monitoring wells (20 feet in depth) to be destroyed
11/1999	Piedmont Lumber	<i>Monitoring Well Destruction Workplan</i> (JCPA)	- Four onsite monitoring wells to be destroyed
11/1999	Piedmont Lumber	RWQCB No Further Action (NFA) Letter	- RWQCB concurs with SJCEHD for case closure of historical subject property LUST case
12/1999	Piedmont Lumber	SJCDEH No Further Action (NFA) Letter/Closure Summary	- SJCDEH grants NFA for subject property LUST case. RWQCB concurrence noted. Case details include the following: - 1 x 350-gallon gasoline fuel UST removed on 7/19/1996 - Four groundwater monitoring wells installed, sampled and subsequently destroyed - Groundwater depths ranged from 6.5-10 ft bgs. Flow direction to the north, northwest.

Year(s)	Tenant	Document Type	Description of Document
			<ul style="list-style-type: none"> - Soil samples before/after (ppm): TPHg (4,300/1.5), Toluene (78/0.013), Benzene (7.5/0.012), Ethylbenzene (82/0.016), Xylene (400/0.048), TPHd (870/ n/a), MTBE (n/a / ND) - Water samples before/after (ppb): TPHg (690/ND), Toluene (22/ND), Benzene (19/5.5), Ethylbenzene (17/1.1), TPHd (NA/ND), MTBE (ND/4.3) - No remediation was performed.
1999	Piedmont Lumber	Closure Summary Notes	- Historical onsite domestic well was sampled BTEX and TPHg (ND) on 3/30/1998. Well was destroyed under SJCEHD permit on 9/14/1998
5/2009	Piedmont Lumber	SJCEHD Invoice	- Noted that business was a previous hazwaste generator

SJCEHD documents indicate that the subject property was formerly equipped with one (1) 350-gallon gasoline fuel UST. During excavation activities, the UST was encountered and subsequently removed on July 19, 1996 and two soil samples were collected one foot below the bottom of the tank. The installation date of the tank is unknown and was likely used to fuel forklifts or other machinery during the occupancy by auto dismantling/repair and/or towing or junk yard businesses. TPHd, TPHg, and BTEX were detected in concentrations ranging from 5.9 ppm to 4,300 ppm. Based on the laboratory results, Hoblitzel & Assoc. recommended additional characterization and remediation. The excavation pit was reportedly left open for approximately one year.

In November 1997, John P. Cummings & Associates (JPCA) conducted a *Phase II Report* on the subject property. Laboratory results indicated that the soil in the upper five feet had minor concentrations of hydrocarbons. Oxygenates were not detected in soil samples. JPCA recommended that the first five feet of soil from the former UST area be removed and that four quarters of groundwater monitoring would be necessary.

Four groundwater monitoring wells were installed in November 1997. Quarterly groundwater monitoring was performed until March 1999 when JPCA recommended regulatory case closure based on low concentrations of COCs.

In December 1999, the SJCEHD and RWQCB issue a No Further Action (NFA) letter for the LUST case. The analytical results of the COCs detected in soil, before and after excavation and monitoring are as follows (listed in ppm): Total Petroleum Hydrocarbons as gasoline (TPHg) (4,300/1.5), Toluene (78/0.013), Benzene (7.5/0.012), Ethylbenzene (82/0.016), Xylene (400/0.048), TPHd (870/ n/a), MTBE (n/a / ND). The analytical results of the constituents of concern (COCs) detected in groundwater, before and after excavation and monitoring are as follows (listed in ppb): TPHg (690/ND), Toluene (22/ND), Benzene (19/5.5), Ethylbenzene (17/1.1), TPHd (NA/ND), MTBE (ND/4.3). Based on the case closed status, no further action is required by the SJCEHD or RWQCB regarding the former subject property LUST case.

LUST case documents also note the presence of a historical onsite domestic well. This well was last sampled in 1998 for BTEX and TPHg (both ND) on 3/30/1998. The historical well was destroyed under SJCEHD permit on 9/14/1998.

Adjacent Property (Southeast)

Environmental Health Department Documents Reviewed 7750 West 11th Street

Year(s)	Tenant	Document Type	Description of Document
7/1987	n/a	Memo	- "Tank removed 7-16-87"
	n/a	Laboratory Report (UST Removal)	- ND concentrations of BTEX and volatile hydrocarbons
8/1987	Ernie's Auto Body	SJCEHD Inspection Report	- One 550-gallon UST (unleaded gasoline) removed. No signs of tank leakage. Two soil samples collected
11/1988	Signal Hill Properties	UST Application (State Form)	- One 550-gallon UST removed

Based on the non-detect concentrations of BTEX and volatile hydrocarbons measured in the two soil samples collected during UST removal, and lack of documented release, the historical presence of the 550-gallon UST located on the adjacent property to the southeast (7750 West 11th Street) is not expected to represent a significant environmental concern.

Adjacent Property (Southwest)

Environmental Health Department Documents Reviewed 7840 West 11th Street

Year(s)	Tenant	Document Type	Description of Document
Undated	Tracy Equipment Rental	Application for Permit to Operate UST	- Notation indicates removal of tanks prior to 1984
3/1986	n/a	UST Program Memo	- Current tanks are aboveground. "All below ground removed."
6/1987	Bruce Vincent	Correspondence	- Property owner informs SJCEHD that the UST was removed in January 1983
11/1988	Tracy Equipment Rental	UST Application (State Form)	- One 1,000-gallon unleaded fuel UST and one 500-gallon waste product UST were removed from this site.

Based on the lack of documented release, the historical presence of the two USTs located on the adjacent property to the southwest (7840 West 11th Street) is not expected to represent a significant environmental concern.

4.1.2 FIRE DEPARTMENT

City Fire Department

On November 17, 2010, the City of Tracy Fire Prevention Bureau (TFPB) (also known as Tracy Rural Fire Department) was contacted for information on the subject property to identify any evidence of previous or current hazardous material usage. As of August 2009, the subject property is located within the inspection jurisdiction of TFPB. Prior to July 2009, the subject property was located within the San Joaquin County Fire Prevention Bureau's (SJCFPB) jurisdiction.

No files were located for the subject property address with the TFPB.

County Fire Department

On November 15, 2010, the San Joaquin County Fire Prevention Bureau (SJCFPB) was contacted for information on the subject property to identify any evidence of previous or current hazardous material usage. Prior to July 2009, the subject property was located within the San Joaquin County Fire Prevention Bureau's (SJCFPB) jurisdiction. SJCFPB staff provided the following activity on file for the subject property over the phone:

San Joaquin County Fire Department Documents

Year(s)	Owner/Applicant	Description of Document
1996	Piedmont Lumber & Mill	Permit – UST Removal (no additional information was provided)

SJCFPB indicates that a permit for a UST removal was granted in 1996 to Piedmont Lumber & Mill. This permit likely corresponds to the 350-gallon UST removed from the subject property in 1996. Refer to Section 5.0 for additional discussion of the UST removal and associated closed LUST case.

4.1.3 BUILDING DEPARTMENT

City Building Department

On November 15, 2010, the City of Tracy Building Department (TBD) was contacted for information on the subject property in order to identify historical tenants and property use. TBD staff informed AEI that the subject property is located within San Joaquin County Community Development Department jurisdiction.

County Building Department

On November 19, 2010, the San Joaquin County Community Development Department, Building Inspection Division (SJJCD) was visited for information on the subject property in order to identify historical tenants and property use. Please refer to the following table for a listing of permits reviewed:

Building Permits Reviewed

Year(s)	Owner/Applicant	Description of Permit / Building Use
1/1978	Applicant: Ed Grogan Tenant: Reed & Son Towing Service	Permit – "Wind damage to roof"
4/1995	Owner: Mila Padilla	Permit – Upgrade electrical service
2/2006	Owner: Piedmont Lumber & Mill Company	Permit – Install 400 amp meter (expired)

Building permit review indicates occupancy by the following tenants: Reed & Son Towing Service (1978) and Piedmont Mill & Lumber Company (2006).

4.1.4 PLANNING DEPARTMENT

On November 19, 2010, the San Joaquin County Planning Department (SJCPD) was contacted for information on the subject property in order to identify AULs associated with the subject property.

No information indicating the existence of AULs was on file for the subject property with the SJCPD.

4.1.5 DEPARTMENT OF OIL AND GAS

Department of Oil and Gas (DOG) maps concerning the subject property and nearby properties were reviewed. DOG maps contain information regarding oil and gas development.

According to the DOG map, there are no oil or gas wells within 500 feet of the subject property. No environmental concerns were noted during the DOG map review.

4.1.6 SAN JOAQUIN COUNTY OFFICE OF EMERGENCY SERVICES

Online Records

On November 24, 2010, the San Joaquin County Office of Emergency Services (SJOES) was contacted for information on the subject property to identify any evidence of previous or current hazardous material usage. The SJOES maintains an online database (www.sjoesdata.org) which contains HMMPs for the last three years.

The following information was provided on the SJOES website for the subject property:

SJOES Online Documents Reviewed

Year(s)	Owner/Applicant	Description of Document
Not stated	Capitol Auto Wrecking	HMMP - (blank)

The historical subject property business was not listed on the SJOES' Out of Compliance Business List.

Agency maintained paper records

On November 15, 24 & 29, 2010 and December 6, 2010 the San Joaquin County Office of Emergency Services (SJOES) was contacted for information on the subject property to identify any evidence of previous or current hazardous material usage. The SJOES maintains Incident Reports which date back to the mid-1980s.

Pursuant to ASTM Standard E1527 Section 7.1.4.2, information that is obtainable within a reasonable time frame is information that will be provided by the source within 20 calendar days of receiving a public information request. Based on the over 20 day processing time and lack of agency response, records from this agency are not considered reasonably ascertainable. However; based on the quality of information obtained from other sources, this limitation not expected to significantly alter the findings of this investigation. Any incident reports or HMMPs would likely also be on file with the SCJEHD.

5.0 REGULATORY DATABASE RECORDS REVIEW

The following information was obtained through a search of electronically compiled federal, state, county, and city databases provided by Track Info Services Environmental FirstSearch. The database search includes regulatory agency lists of known or potential hazardous waste sites, landfills, hazardous waste generators, and disposal facilities in addition to sites under investigation. The information provided in this report was obtained from publicly available sources. The locations of the sites listed in this report are plotted with a geographic information system utilizing geocoding of site addresses. The accuracy of these locations is generally +/- 300 feet. AEI's field representative has attempted to confirm the locations of listings on or adjacent to the subject property. Refer to the radius map (Appendix B: Regulatory Database Review Report) for the locations of the sites in relation to the subject property.

Migration of petroleum hydrocarbon or volatile organic compound (VOC) contamination is generally via groundwater. Therefore, only those contaminant release sites located hydrologically upgradient relative to the subject property are expected to represent a potential environmental concern to the subject property. Contaminated sites located hydrologically downgradient of the subject property are not expected to represent a potential threat to the groundwater quality beneath the subject property. Sites that are situated hydrologically cross-gradient relative to the subject property are not expected to represent a concern unless close proximity allows for the potential of lateral migration. As discussed in Section 2.3, groundwater in the vicinity of the subject property is calculated to flow to the north - northwest. The migration of VOC contaminants in the vapor phase does have the potential to impact properties; however, evaluation of vapor phase migration and intrusion is beyond the scope of this assessment.

Database	Target Property	Adjacent Property	Search Distance (Miles)	0.125	0.25	0.5	1-mile	Total
NPL			1	0	0	0	0	0
DELISTED NPL			1	0	0	0	0	0
CERCLIS			0.5	0	0	0	-	0
CERCLIS NFRAP			0.5	0	0	0	-	1
RCRA-TSD			1	0	0	0	1	1
RCRA-LQG			0.25	0	0	-	-	0
RCRA-SQG		X	0.25	0	4	-	-	5
RCRA CORRACTS			1	0	0	0	1	4
US ENG CONTROLS			0.5	0	0	0	-	0
US INST CONTROLS			0.5	0	0	0	-	0
ERNS			0.5	0	0	0	-	5
SHWS (Spills, SLIC, Envirostor, Historical Cal Sites)			1	0	0	0	7	7

Database	Target Property	Adjacent Property	Search Distance (Miles)	0.125	0.25	0.5	1-mile	Total
SWLF			0.5	0	0	0	-	0
UST		X	0.25	1	3	-	-	4
LUST	X	X	0.5	2	2	5	-	9
STATE IC/EC			TP	-	-	-	-	0
VCP			0.5	0	0	0	-	0
STATE/TRIBAL BROWNFIELD			0.5	0	0	0	-	0
ORPHAN			1	-	-	-	-	0
NON-ASTM DATABASES			TP/ADJ	-	-	-	-	0

The subject property was identified in the regulatory database as a closed LUST site, and is further discussed below.

The adjacent site to the east was identified in the regulatory database as a RCRA-SQG, UST and open LUST site, and is further discussed in Section 5.0.

The following sites, (not technically adjacent, yet beyond West 11th Street to the south) were identified in the regulatory database as the following and are further discussed in Section 5.0:

- "Tracy Equipment Rental" (7840 Eleventh) - UST
- "Signal Hill Properties" (7750 Eleventh) – UST

Additionally, other sites are discussed in detail below due to their relative proximity to the subject property, the nature of the listing, and/or hydrological position relative to the subject property.

<p>Site Name: Piedmont Lumber Database(s): LUST (closed) Address: 7777 11th St. W, Tracy Distance: Subject Property Direction: n/a</p>
<p>Comments: - According to the regulatory database, the subject property is listed as a closed LUST case. Based on documents reviewed at the SJCEHD, it was noted that the subject property was formerly equipped with one (1) 350-gallon gasoline fuel UST. During excavation activities, the UST was encountered and subsequently removed on July 19, 1996 and two soil samples were collected one foot below the bottom of the tank. The installation date of the tank is unknown and was likely used to fuel forklifts or other machinery during the occupancy by auto dismantling/repair and/or towing or junk yard businesses. TPHd, TPHg, and BTEX were detected in concentrations ranging from 5.9 ppm to 4,300 ppm. Based on the laboratory results, Hoblitzel & Assoc. recommended additional characterization and remediation. The excavation pit was reportedly left open for approximately one year.</p> <p>In November 1997, John P. Cummings & Associates (JPCA) conducted a <i>Phase II Report</i> on the subject property. Laboratory results indicated that the soil in the upper five feet had minor concentrations of hydrocarbons. Oxygenates were not detected in soil samples. JCPA recommended that the first five feet of soil from the former UST area be removed and that four quarters of groundwater monitoring</p>

would be necessary.

Four groundwater monitoring wells were installed in November 1997. Quarterly groundwater monitoring was performed until March 1999 when JCPA recommended regulatory case closure based on low concentrations of COCs.

In December 1999, the SJCEHD and RWQCB issue a No Further Action (NFA) letter for the LUST case. The analytical results of the COCs detected in soil, before and after excavation and monitoring are as follows (listed in ppm): Total Petroleum Hydrocarbons as gasoline (TPHg) (4,300/1.5), Toluene (78/0.013), Benzene (7.5/0.012), Ethylbenzene (82/0.016), Xylene (400/0.048), TPHd (870/ n/a), MTBE (n/a / ND). The analytical results of the constituents of concern (COCs) detected in groundwater, before and after excavation and monitoring are as follows (listed in ppb): TPHg (690/ND), Toluene (22/ND), Benzene (19/5.5), Ethylbenzene (17/1.1), TPHd (NA/ND), MTBE (ND/4.3).

- Based on the case closed status, the historical subject property LUST case is not expected to represent a significant environmental concern.

Site Name: Fayette Manufacturing Corp.
Database(s): LUST (open), RCRA-SQG, UST
Address: 7675 11th St. W, Tracy
Distance: Adjacent
Direction: East (hydrologically crossgradient)

Comments:

LUST

- According to the regulatory database, this site is listed as an open LUST site. AEI reviewed *Second Quarter 2010 Groundwater Monitoring Report for the Fayette Manufacturing Site, 7675 West Eleventh Street, Tracy* (ATC Associates, June 2010) from the RWQCB's Geotracker database. The report states that two 500-gallon gasoline USTs were removed from the site. Groundwater monitoring activities have been ongoing since 1995. ATC stated that "the petroleum hydrocarbon impacted groundwater plume beneath the site has been laterally defined in all directions [and] ... appears to be stable. The dissolved contaminant mass is primarily confined to an area surrounding the former locations of the USTs." Onsite monitoring well MW-6 (well located closest to the subject property, approximately 95 feet east) most recently contained the following concentrations for COCs: TPHg (<50 ppb) and Benzene, MTBE (<0.5 ppb). Figures 4-6 indicate that the contaminated groundwater plume has not migrated offsite.

- Based on the non-detect levels of COCs in MW-6, stability of the contaminated groundwater plume and cross gradient location, this site is not expected to represent a significant environmental concern.

RCRA-SQG

- According to the regulatory database, this site is listed as a RCRA-SQG site. No additional information was provided in the regulatory database.

- Based on the rationale provided in the LUST segment above, the storage of hazardous materials at this site is not expected to represent a significant environmental concern.

UST

- According to the regulatory database, this site is listed as a UST site with inactive status. No additional information was provided in the regulatory database. This listing likely corresponds with the historical (removed) USTs associated with the onsite open LUST case.

- Based on the rationale provided in the LUST segment above, the historical presence of USTs at this site is not expected to represent a significant environmental concern.

Site Name: Tracy Equipment Rental
Database(s): UST
Address: 7840 Eleventh, Tracy
Distance: 82 feet
Direction: Southwest (hydrologically partially upgradient)

Comments:
- According to the regulatory database, this site is listed as a UST site with inactive status. No additional information was provided in the regulatory database. This listing likely corresponds with the historical (removed) USTs. AEI reviewed documentation for this site on file with the SJCEHD indicating one 1,000-gallon unleaded fuel and one 500-gallon waste product USTs were removed from the site in January 1983.
- Based on the removal of the tanks and the lack of a documented release, the historical presence of USTs located on this property is not expected to represent a significant environmental concern.

Site Name: Signal Hill Properties
Database(s): UST
Address: 7750 Eleventh, Tracy
Distance: 82 feet
Direction: South/southeast (hydrologically upgradient)

Comments:
- According to the regulatory database, this site is listed as a UST site with inactive status. No additional information was provided in the regulatory database. This listing likely corresponds with the historical (removed) UST. AEI reviewed documentation for this site on file with the SJCEHD indicating one 550-gallon unleaded fuel UST was removed from the site in July 1987. No signs of tank leakage were noted during removal and BTEX and hydrocarbon concentrations were noted to be non-detect.
- Based on the removal of the tank and the lack of a documented release, the historical presence of UST located on this property is not expected to represent a significant environmental concern.

Site Name: City of Tracy (East 11th Street Construction Project)
Database(s): ORPHAN (SPILLS)
Address: 11th Street, Tracy
Distance: unknown
Direction: unknown

Comments:
- According to the regulatory database, this site is listed as an ORPHAN (SPILLS) site with "open – inactive" status. The database stated that as of May 1993, the site was under investigation by the Central Valley RWQCB (lead agency). No additional information or specific address was provided on the database listing. No documents were available for review on the RWQCB's online Geotracker database. AEI submitted a FOIA to the CVRWQB with associated case number. On November 19, 2010, CVRWQB staff informed AEI that no such case/files exists for the provided site name or case number. CVRWQB staff indicated that it is common that inactive status sites may be listed on Geotracker with no associated documents or information.
- Based on the lack of listing as a formal cleanup case by CVRWQB, this site is not expected to represent a significant environmental concern.

Site Name: Tracy Defense Depot
Database(s): STATE, RCRA-CORRACTS
Address: 25600 South Chrisman Road, Tracy
Distance: 1.03 mile
Direction: Southeast (hydrologically crossgradient)

Comments:

- According to the regulatory database, this site is listed as a STATE and RCRA-CORRACTS site. The database states that historical defense depot, warehousing and governmental support activities released a variety of contaminants including: MEK, Mercury, Methylene Chloride, Lindane, Reactive waste, silver, arsenic, lead, ignitable waste, tetrachloroethylene, chloroform and trichloroethylene into groundwater. Human Exposures have been controlled. According to the DTSC's online Envirostor database, all removal actions have been completed and groundwater extraction/treatment systems are planned to operate for at least twenty more years. This site is also noted to be listed as an active Superfund site. *DDJC Tracy Five Year Review Report* (URS Group, September 2005), reviewed on the Superfund website, indicated that the nearest boundaries of the TCE and PCE plumes are located approximately 0.75 mile southeast (Figures 5-2, 5-3, A-6 and A-7).

- Based on the relative distance and location of the nearest boundaries of the TCE and PCE contaminated groundwater plumes, this site is not expected to represent a significant environmental concern.

Based on the relative distance from the subject property, inferred direction of groundwater flow, and/or regulatory status, the remaining listed sites are not expected to represent a significant environmental concern.

6.0 INTERVIEWS AND USER PROVIDED INFORMATION

6.1 INTERVIEWS

Pursuant to ASTM E1527-05, the following interviews were performed during this investigation in order to obtain information indicating RECs in connection with the subject property.

6.1.1 INTERVIEW WITH OWNER

The subject property owner, Bill Myer, was not interviewed during this investigation. Piedmont Lumber & Mill Company Inc. staff indicated that long time Piedmont Lumber & Mill Company Inc. Manager Richard Wheeler would be best able to provide detailed information regarding subject property history and operations. Refer to Section 6.1.2 for a summary of AEI's interview with Mr. Wheeler.

6.1.2 INTERVIEW WITH KEY SITE MANAGER

The key site manager, Mr. Richard Wheeler, was not aware of 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.

Mr. Wheeler was interviewed via phone on November 18th and 22nd, 2010 in order to ascertain historical occupancy and current information regarding subject property features. Mr. Wheeler has been associated with the subject property since 1999. The following key points were noted during both interviews:

- Subject property was historically occupied by auto and/or farm equipment wrecking yards (dating back to the 1940s/1950s). The two existing structures were likely constructed between 1940 and 1950. The concrete block building was historically used for auto repair/office and the pole barn building was historically used as a tear down shop.
- The subject property lies within an area of land which locals have nicknamed the "Bermuda Triangle," based on the triangular collection of parcels which are located on the edge of the City of Tracy and within the County of San Joaquin's jurisdiction.
- Mr. Wheeler noted that the subject property owner, Piedmont Lumber & Mill historically owned the adjacent property to the east (7675 West 11th Street) since approximately 1990/1992. Around 1999, Piedmont Lumber required more room, and therefore purchased the subject property. This adjacent property was historically used as a John Deere tractor dealership, car dealership, vacant lot, and most recently a lumber mill. The subject property lot was observed to be dirt (covered with small pieces of auto parts) at the time of acquisition.
- Beginning in 1999, the subject property pole barn building was used by Piedmont Lumber for storage of lumber and machinery. The concrete block building was most recently used for the storage of records, machinery and conveyors.

- Mr. Wheeler noted that one UST was removed from behind the concrete block building. It was thought that this tank was likely used by the previous auto wrecking companies which occupied the subject property prior to 1996. Piedmont Lumber did not use the tank. The UST had evidentially leaked into the historical septic system. The septic tank and associated leach field were removed during the time of the UST removal.

- Railroad tracks are located adjacent to the north of the subject property; however no spurs are currently or were historically located on the subject property.

- During Piedmont Lumber's tenancy, no chemicals were stored onsite. Such hazardous materials were stored on the adjacent property to the east (7675 West 11th Street). Electric powered saws, a compressor and lumber were stored on the subject property. No sumps, transformers, sewage system or potable water service exists on the subject property.

- One historical water supply well (installation date unknown) was removed from the subject property and properly destroyed in 1998. This well was destroyed shortly after Piedmont Lumber's purchase and cleanup of the property.

- One inactive water supply well is located on the eastern side of the subject property. It was historically used to supply water for the adjacent property to the east (7675 West 11th Street). It was installed between 2000 and 2002. It was most recently used to supply the fire suppression system on the subject property.

6.1.3 PAST OWNERS, OPERATORS AND OCCUPANTS

Interviews with past owners and occupants regarding historical onsite operations were not reasonably ascertainable. However, based on information obtained from other sources including, city directories, site manager interviews, building department documentation and aerial photographs, it is likely that the information provided by past owners and operators would have been duplicative.

6.1.4 INTERVIEW WITH OTHERS

Information obtained during interviews with local government officials is incorporated into the appropriate segments of this section.

6.2 USER PROVIDED INFORMATION

User provided information is intended to help identify the possibility of RECs in connection with the subject property. According to ASTM E1527-05 and EPA's AAI Rule, the following items should be researched by the prospective landowner or grantee, and the results of such inquiries may be provided to the environmental professional. The responsibility for qualifying for Landowner Liability Protections (LLPs) by conducting the following inquiries ultimately rests with the User, and providing the following information to the environmental professional would be prudent if such information is available.

6.2.1 ENVIRONMENTAL LIENS

AEI was not informed by the User, Piedmont Lumber & Mill Company Inc., of any environmental cleanup liens encumbering the subject property that are filed or recorded under federal, tribal, state or local law.

6.2.2 ACTIVITY AND LAND USE LIMITATIONS

AEI was not informed by the User of any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the subject property and/or have been filed or recorded in a registry under federal, tribal, state or local law.

6.2.3 SPECIALIZED KNOWLEDGE

AEI was not informed by the User of any specialized knowledge or experience related to the subject property or nearby properties.

6.2.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

The User did not indicate to AEI any information to suggest that the valuation of the subject property is significantly less than the valuation for comparable properties due to environmental factors.

6.2.5 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION

The User did not inform AEI of any commonly known or reasonably ascertainable information about the subject property which aided AEI in identifying conditions indicative of a release or threatened release.

6.2.6 KNOWLEDGE OF PRESENCE OR LIKELY PRESENCE OF CONTAMINATION

The User did not inform AEI of any obvious indicators that pointed to the presence or likely presence of contamination at the subject property.

6.2.7 PREVIOUS REPORTS AND OTHER PROVIDED DOCUMENTATION

Documentation was provided to AEI by Piedmont Lumber & Mill Company Inc. during this investigation. A summary of this information follows:

Phase 1 Environmental Assessment, 7777 West Eleventh Street, Tracy, CA (John P. Cummings & Associates, November 20, 1999)

History

- Empty field (prior to WW2), automobile storage/repair (began in 1952), automobile wrecking and/or junk yard (1975-1990)
- One 350-gallon unleaded gasoline fuel UST was removed from the subject property on July 19, 1996. Soil samples taken from the bottom of the excavation were analyzed for TPHg and BTEX. TPHg was detected at the following concentrations: 4,300 ppm (6.5 ft bgs) and 540 ppm (9 ft bgs). The results of these analyses were documented in a report by John P. Cummings & Associates (JPCA) dated August 12, 1996. (This August 12, 1996 report nor the appendices for the November 20, 1999 report were not provided by the client). Soil was reportedly excavated to approximately 10 ft bgs and aerated. The excavation was left open for approximately one year. The excavation was reportedly backfilled with clean fill material in October 1997. Four monitoring wells were constructed in November 1997. The soil in the upper five feet had minor concentrations of hydrocarbon contamination (exact number not specified). No detectable contamination for the fuel oxygenates was found in the soil samples. Groundwater contained less than 1

ppm TPHg and 20 ppb benzene. One groundwater sample from MW-3 contained 5.6 ppb MTBE. The remaining groundwater samples reportedly contained no detectable concentrations (< 5 ppb) of fuel oxygenates. A File Closure Letter was issued by the Regional Water Quality Control Board on November 16, 1999 was included.

- A potable water well (different from the current inactive potable water well present on the subject property) was destroyed in March 1998. No detectable concentrations of TPHg, BTEX or Oxygenates were discovered.

Site Observations

- At the time of the inspection, the subject property contained one 3,000-square foot cinder block, concrete floored structure and one 3,000-square foot wood framed building, with corrugated steel siding and concrete floor. A destroyed water supply well with pump and four monitoring wells were also observed. No "...hazardous or toxic activity was observed during [the] reconnaissance." The subject property was used for wooden truss storage at the time of the inspection.

Recommendations

- JPCA stated that "...the subject property [was] not a contaminating site" and did not recommend any additional investigations.

A copy of this report is provided in Appendix C.

7.0 SITE INSPECTION AND RECONNAISSANCE

On November 19, 2010, a site reconnaissance of the subject property and adjacent properties was conducted by Katie Hindt of AEI in order to obtain information indicating the likelihood of recognized environmental conditions at the subject property and adjacent properties as specified in ASTM Standard Practice E1527-05 §8.4.2, 8.4.3 and 8.4.4.

7.1 SUBJECT PROPERTY RECONNAISSANCE FINDINGS

Identified		Observation
Yes	No	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substances and/or Petroleum Products in Connection with Property Use
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substance and Petroleum Product Containers and Unidentified Containers not in Connection with Property Use
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unidentified Substance Containers
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Electrical or Mechanical Equipment Likely to Contain Fluids
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Interior Stains or Corrosion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Strong, Pungent or Noxious Odors
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pools of Liquid
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Drains, Sumps and Clarifiers
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Pits, Ponds and Lagoons
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Stained Soil or Pavement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stressed Vegetation
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Solid Waste Disposal or Evidence of Fill Materials
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Waste Water Discharges
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Wells
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Septic Systems
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other

The property totals approximately 4.91 acres and is improved with one (1) one-story concrete block building (3,000 square feet) and one pole barn building (3,000 square feet). Both structures are currently vacant. The subject property was most recently used by Piedmont Lumber for wooden truss manufacturing and storage. The subject property is currently vacant. Recent on-site operations included a lumber cutting and related lumber storage yard operated by Piedmont Lumber & Mill Company, Inc. No hazardous materials or petroleum products are stored onsite.

ABOVEGROUND & UNDERGROUND HAZARDOUS SUBSTANCE OR PETROLEUM PRODUCT STORAGE TANKS (ASTs / USTs)

An asphalt patched area was observed adjacent to the northwest of the concrete block building. This area corresponds to the historical 350-gallon fuel UST removed in 1996. Based on the regulatory closed status of the associated subject property LUST case, the historical presence of the onsite UST is not expected to represent a significant environmental concern.

UNIDENTIFIED SUBSTANCE CONTAINERS

AEI observed one (1) 55-gallon drum located adjacent to the southwestern corner of the concrete block building during site reconnaissance. Neither AEI, nor Mr. Wheeler were able to confirm the contents of the drum. No staining or evidence of release of any of the materials was observed. Based on the lack of a documented release, and the lack of evidence of the mismanagement, the presence of the drum is not expected to represent a significant environmental concern. However, as a best management practice, the drum should be removed from the subject property and properly disposed of.

INTERIOR STAINS OR CORROSION

Minor amounts of oily surface staining were observed within the concrete block building. The staining was located on concrete, and no drains were observed in the vicinity. Based on the small size and surficial nature of the staining, it is not expected to represent a significant environmental concern.

DRAINS AND SUMPS

Nine (9) storm drains were observed in the asphalt paved yard area of the subject property. No hazardous substances or petroleum products were noted in the vicinity of the drains. Based on the use of the drains solely for storm water runoff, the presence of the drains is not expected to represent a significant environmental concern.

PITS, PONDS AND LAGOONS

Pits

One (1) pit measuring approximately 2' x 2' was observed to the northwest of the pole barn structure. The pit was covered with a steel plate. The inside of the pit appeared to contain a dark colored soil-like material. No hydrocarbon odors were observed in relation to the pit during AEI's site reconnaissance. Mr. Wheeler, Piedmont Lumber's long time manager, indicated that the pit it likely filled with sawdust and was never associated with a drainage system or sump. The pit is most likely a depression in the ground, which was filled with sawdust and covered with a steel plate for safety reasons. Based on this information, the presence of the pit is not expected to represent a significant environmental concern.

Lagoons

An area of wetland was observed on the northeastern portion of the subject property. Tires, concrete pieces and wood timbers were observed within the wetland. Detailed observation of the area was not possible as the area was enclosed by a chain link/razor wire fence. According to the FEMA website, this area of Tracy does not have wetland map coverage. No evidence of discolored water, distressed vegetation or obvious wastewater discharge was observed during AEI's reconnaissance. Based on this information, the onsite wetland is not expected to represent a significant environmental concern.

STAINED SOIL OR PAVEMENT

Minor amounts of oily surface staining were observed under the canopy (adjacent to the northeast of the concrete block building), former compressor shed (adjacent to the northeast of the pole barn) and on a concrete pad on the eastern side of the property. The staining was located on concrete, and no drains were observed in the vicinity. Based on the small size and

surficial nature of the staining, it is not expected to represent a significant environmental concern.

Minor amounts of red-colored surface staining were observed on the northern half of the property. The staining was located on asphalt, and no drains were observed in the vicinity. Based on the small size and surficial nature of the staining, it is not expected to represent a significant environmental concern.

WELLS

An inactive domestic drinking water supply well was observed on the eastern side of the subject property during the site reconnaissance. The depth of the well was reported to be approximately 80 feet bgs. According to the site representative, Mr. Richard Wheeler, the well was installed between 2000 and 2002 and was briefly used for providing water for the adjacent property to the east (7675 West 11th Street). The subject property does not have plumbing. The well was most recently used for the onsite fire system until September 2010. The presence of the well is considered an environmental issue because wells represent a conduit to the subsurface. Although small quantities of hazardous materials and petroleum products were previously stored onsite, these materials were reportedly not stored in the immediate vicinity of the well. Therefore, the presence of the well is not expected to represent a significant environmental concern. However, AEI recommends that the on-site well be properly decommissioned or tested for potability should the subject property owner wish to use the well for drinking water purposes in the future.

OTHER

AEI observed two capped steel pipes located within the drainage ditch on the southern property boundary, bordering West 11th Street. The pipes were observed to be rusted or welded shut at the time of the site reconnaissance. Mr. Wheeler reported that the pipes were part of a former network of pipes that ran along West 11th Street at the subject property and adjacent property to the east that were utilized as fence posts and cable anchorage. Based on this information and the location of the pipes right along the road, it appears unlikely that these pipes are/were associated with underground features such as a UST; therefore, the pipes are not expected to represent a significant environmental concern.

7.2 NON-ASTM SERVICES

7.2.1 ASBESTOS-CONTAINING BUILDING MATERIALS

OSHA

For buildings constructed prior to 1981, the Code of Federal Regulations (29 CFR 1926.1101 and 29 CFR 1910.1001) define presumed asbestos-containing material (PACM) as 1. Thermal System Insulation (TSI), e.g., boiler insulation, pipe lagging, fireproofing; and 2. Surfacing Materials, e.g., acoustical ceilings. Building owners/employers are responsible for locating the presence and quantity of PACM. Building Owners/employers can rebut installed material as PACM by either having an inspection in accordance with Asbestos Hazard Emergency Response Act (AHERA) (40 CFR Part 763, Subpart E) or hiring an accredited inspector to take bulk samples of the suspect material.

Typical materials not covered by the presumptive rule include but are not limited to: floor tiles and adhesives, wallboard systems, siding and roofing. Building materials such as wallboard systems may contain asbestos but unless a building owner/employer has specific knowledge or should have known through the exercise of due diligence that these other materials contain asbestos, the standard does not compel the building owner to sample these materials.

NESHAP

The applicability of the EPA's National Emission Standards for Hazardous Air Pollutants (NESHAP, 40 CFR Chapter 61, Subpart M) apply to the owner or operator of a facility where an inspection for the presence of asbestos-containing materials (ACM), including Category I (asbestos containing packings, gaskets, resilient floor coverings and asphalt roofing products), and Category II (all remaining types of non-friable asbestos containing material not included in Category I that when dry, cannot be crumbled, pulverized or reduced to powder by hand pressure), non-friable ACM must occur prior to the commencement of demolition or renovation activities. NESHAP defines ACM as any material or product that contains *greater than 1%* asbestos. It should be noted that the NESHAP regulation applies to all facilities regardless of construction date, including: 1. Any institutional, commercial, public, industrial, or residential structure, installation, or building; 2. Any ship; and 3. Any active or inactive waste disposal site. This requirement is typically enforced by the EPA or by local air pollution control/air quality management districts.

The information below is for general informational purposes only and does not constitute an asbestos survey. In addition, the information is not intended to comply with federal, state or local regulations in regards to ACM.

Due to the age of the concrete block subject property building (constructed prior to 1952), there is a potential that asbestos-containing materials (ACMs) are present. The condition and friability of the indentified suspect ACMs is noted in the following table:

Suspect Asbestos Containing Materials (ACMs)

Material	Location	Friable	Condition
Ceiling tiles	Interior of concrete block	No	- Four removed

Material	Location	Friable	Condition
	building (office and storage area)		- Two damaged
Floor tiles	Interior of concrete block building (storage area)	No	- 5'x20' damaged section
Roofing Systems	Roof	Not Inspected	Not Inspected

All observed suspect ACMs were in good condition with the exception of four removed and two damaged ceiling tiles, and one 5'x20' section of damaged floor tiles. The identified 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. Based on the potential presence of ACMs, AEI recommends the property owner implement an Operations and Maintenance (O & M) Plan which stipulates that assessment, repair and maintenance of damaged materials be performed to protect the health and safety of the building occupants.

7.2.2 LEAD-BASED PAINT

Lead-based paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has $\geq 1 \text{ mg/cm}^2$ (5,000 $\mu\text{g/g}$ or 5,000 ppm) or more of lead by federal guidelines; state and local definitions may differ from the federal definitions in amounts ranging from 0.5 mg/cm^2 to 2.0 mg/cm^2 . Section 1017 of the Housing and Urban Development (HUD) Guidelines, Residential Lead-Based Paint Hazard Reduction Act of 1992, otherwise known as "Title X", defines a LBP hazard is "any condition that causes exposure to lead that would result in adverse human health effects" resulting from lead-contaminated dust, bare, lead-contaminated soil, and/or lead-contaminated paint that is deteriorated or present on accessible, friction, or impact surfaces. Therefore, under Title X, intact lead-based paint on most walls and ceilings would not be considered a "hazard", although the paint should be maintained and its condition and monitored to ensure that it does not deteriorate and become a hazard. Additionally, Section 1018 of this law directed HUD and EPA to require the disclosure of known information on lead-based paint and lead-based paint hazards before the sale or lease of most housing built before 1978. Most private housing, public housing, federally owned or subsidized housing are affected by this rule.

Lead-containing paint (LCP) is defined as any paint with any detectable amount of lead present in it. It is important to note that LCP may create a lead hazard when being removed. The condition of these materials must be monitored when they are being disturbed. In the event LCP is subject to abrading, sanding, torching and/or cutting during demolition or renovation activities, there may be regulatory issues that must be addressed.

The information below is for general informational purposes only and does not constitute a lead hazard evaluation. In addition, the information is not intended to comply with federal, state or local regulations in regards to lead-containing paints.

In buildings constructed after 1978, it is unlikely that LBP is present. Structures built prior to 1978 and especially prior to the 1960's should be expected to contain LBP.

Due to the age of the concrete block subject property building (constructed prior to 1952), there is a potential that LBP is present. During the site inspection damaged paint surfaces were

observed in the southwestern corner of the building. Based on the potential presence of LBP, AEI recommends the property owner implement an Operations and Maintenance (O & M) Plan which stipulates that the assessment, repair and maintenance of damaged painted surfaces be performed to protect the health and safety of the building occupants. Local regulations may apply to lead-based paint in association with building demolition/renovations and worker/occupant protection. Actual material samples would need to be collected or an XRF survey performed in order to determine if LBP is present. It should be noted that construction activities that disturb materials or paints containing *any amount* of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

7.2.3 RADON

Radon is a naturally-occurring, odorless, invisible gas. Natural radon levels vary and are closely related to geologic formations. Radon may enter buildings through basement sumps or other openings.

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, Zone 1 being those areas with the average predicted indoor radon concentration in residential dwellings exceeding the EPA Action limit of 4.0 picoCuries per Liter (pCi/L). It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the 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 requested as part of this investigation. According to the US EPA, the radon zone level for the area is Zone 3, which has a predicted average indoor screening level of less than 2 pCi/L, below the action level of 4.0 pCi/L set forth by the EPA.

7.2.4 DRINKING WATER SOURCES AND LEAD IN DRINKING WATER

The subject property is not currently receiving potable water or plumbing services. Refer to Section 7.0 for information regarding the on-site water well.

7.2.5 MOLD/INDOOR AIR QUALITY ISSUES

Molds are simple, microscopic organisms, which can often be seen in the form of discoloration, frequently green, gray, white, brown or black. When excessive moisture or water accumulates indoors, mold growth will often occur, particularly if the moisture problem remains undiscovered or is not addressed. As such, interior areas of buildings characterized by poor ventilation and high humidity are the most common locations of mold growth. Building materials including drywall, wallpaper, baseboards, wood framing, insulation, and carpeting often play host to such growth. Mold spores primarily cause health problems through the inhalation of mold spores or the toxins they emit when they are present in large numbers. This can occur primarily when there is active mold growth within places where people live or work.

Mold, if present, may or may not visually manifest itself. Neither the individual completing this inspection, nor AEI has any liability for the identification of mold-related concerns except as defined in applicable industry standards. In short, this Phase I ESA should not be construed as a mold survey or inspection.

AEI Consultants observed interior areas of the subject buildings in order to identify the significant presence of mold. During the on-site reconnaissance, the following obvious visual signs of mold growth or conditions conducive for mold growth were observed within the concrete block building.

Location	Size of Area Affected	Condition
Ceiling/wall area (southwestern corner)	2'x2' ceiling 2'x5' wall	Apparent water damage

Please refer to Appendix A for related photographs.

Although typically not included in the scope of work for a *Phase I ESA*, the presence of the mold may pose a health and safety concern to any subsequent occupants and/or construction workers during future renovation activities. Based upon the amount of fungal growth observed, AEI recommends that remediation clean-up of visible mold be conducted within the affected area, which should include but not be limited to the following:

- Remediation/clean-up shall be conducted using a mild disinfectant by onsite staff utilizing N95 dust masks and gloves, and
- All mold affected building materials, as well as used gloves and masks, shall be disposed of in sealed plastic bags.

Repairs to prevent water intrusion and damage in the impacted area should also be performed. AEI's remediation recommendations are based upon accepted guidelines determined by the American Conference of Industrial Hygienists (ACGIH), New York City Department of Health (NYCDOH), and Environmental Protection Agency (EPA).

In addition, in order to assist onsite staff with proper methods of mold growth evaluation and remediation, as well as proper training for onsite maintenance personnel, it would be prudent for the property owner to implement a Mold/Moisture Plan (MMP).

This activity was not designed to discover all areas which may be affected by mold growth on the subject property. Rather, it is intended to give the client an indication if significant (based on observed areas) mold growth is present at the subject property. Additional areas of mold not observed as part of this limited assessment, possibly in pipe chases, HVAC systems and behind enclosed walls and ceilings, may be present on the subject property.

7.3 ADJACENT PROPERTY RECONNAISSANCE FINDINGS

Identified		Observation
Yes	No	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hazardous Substances and/or Petroleum Products in Connection with Property Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substance and Petroleum Product Containers and Unidentified Containers not in Connection with Property Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Unidentified Substance Containers
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Electrical or Mechanical Equipment Likely to Contain Fluids
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Interior Stains or Corrosion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Strong, Pungent or Noxious Odors
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pool of Liquid
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Drains and Sumps
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Pits, Ponds and Lagoons
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stained Soil or Pavement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stressed Vegetation
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Solid Waste Disposal or Evidence of Fill Materials
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Waste Water Discharges
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Wells
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Septic Systems
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other

ELECTRICAL OR MECHANICAL EQUIPMENT LIKELY TO CONTAIN FLUIDS

One (1) pole-mounted transformer was observed on the adjacent site to the east during the site inspection. No spills, staining, or leaks were observed on or around the transformer. Based on the good condition of the equipment, the transformer is not expected to represent a significant environmental concern.

DRAINS AND SUMPS

Multiple storm drains were observed in the parking and street areas of the adjacent properties. No hazardous substances or petroleum products were noted in the vicinity of the drains. Based on the use of the drains solely for storm water runoff, the presence of the drains is not expected to represent a significant environmental concern.

PITS, PONDS AND LAGOONS

An area of wetland was observed on the northwestern portion of the adjacent property to the east (7675 West 11th Street). Tires, concrete pieces and wood timbers were observed within the wetland. Detailed observation of the area was not possible as the area was enclosed by a chain link/razor wire fence. According to FEMA, this area of Tracy does not have wetland map coverage. No evidence of discolored water, distressed vegetation or obvious wastewater discharge was observed during AEI's reconnaissance. Based on this information, the adjacent wetland is not expected to represent a significant environmental concern.

WELLS

7675 West 11th Street

One (1) drinking water well and pump house were observed on the adjacent property to the east during site reconnaissance. Based on the nature of the well, the presence of the water well on the adjacent property is not expected to represent a significant environmental concern.

According to SCJEHD and RWQCB documentation, nine (9) groundwater monitoring wells are located on the adjacent property to the east. The wells are associated with the onsite active LUST case, "Fayette Manufacturing Corp." and is further discussed in Section 5.0.

8.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS

By signing this report, the senior author declares that, to the best of his or her professional knowledge and belief, he or she meets the definition of *Environmental Professional* as defined in §312.10 of 40 CFR Part 312.

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

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