November 29, 2022

Romelia Edwards
InSite Property Group.
19191 S. Vermont Avenue, Suite 680
Torrance, CA 90502

Re: Stockpile Sampling Report
5780 – 5790 Quarry Road, Bonita, California ("Site")

Dear Ms. Edwards:

On behalf of InSite Property Group (InSite), Roux Associates, Inc. (Roux) has prepared this *Stockpile Sampling Report* to document the sampling and analysis of existing soil stockpiles at the property located at 5780 – 5790 Quarry Road in Bonita California (the Site, Figure 1). Based on the information provided in the Geocon Incorporated (Geocon) *Phase I and II Environmental Assessment Report*, dated March 17, 2021, Roux understands that the Site is approximately 9.45 acres with a majority of the Site consisting of vacant land with some remnants of former structures. Based on information provided by InSite there are two undocumented stockpiles of soil on the Site. This report documents the sampling and analysis of the stockpile soils for environmental parameters to facilitate appropriate handling of the material.

Characterization of Stockpiled Soil

Based on information provided by InSite there were known to be several undocumented soil stockpiles on the Site Geocon estimated that between the stockpiles there is approximately 1,000 cubic yards of soil. Given that the source or origin of the undocumented soil stockpiles remains unknown, Roux proposed to collect representative soil samples from the stockpiles based on size of each stockpile. The Department of Toxics Substances Control (DTSC) *Clean Imported Fill Material Advisory* (dated October 2001) recommends that potential fill material from a stockpile should be sampled at a minimum frequency of one sample per 250 cubic yard of soil. To meet or exceed this requirement, Roux collected five representative samples from the approximately 1,000 cubic yards of material stockpiled at the Site (approximately one sample per 200 cubic yards).

Roux field personnel mobilized to the Site on October 25, 2022 to complete the stockpile sampling. Each sample analyzed was the composite of two sub-samples for improved representation. The location of the stockpiled soil material and the approximate sampling locations are provided on Figure 2.

In accordance with the *Clean Imported Fill Material Advisory*, each of the composite soil samples were submitted to a State-certified laboratory and analyzed for the following constituents:

- Total Petroleum Hydrocarbons (TPH) using United States Environmental Protection Agency (USEPA) Method 8015M as Carbon Chain C_6-C_{44};
- Volatile Organic Compounds (VOCs) including Fuel Oxygenates using USEPA Method 8260B;
- Semi-Volatile Organic Compounds (SVOCs) using USEPA Method 8270C;
- Title 22 (CAM-17) Metals using USEPA Methods 6010B and 7471A;
- Organochlorine Pesticides (OCPs) using USEPA Method 8081A;

- Polychlorinated Biphenyls (PCBs) using USEPA Method 8082;
- Poly Aromatic Hydrocarbons (PAHs) using USEPA Method 8310;
- Organophosphorus pesticides using USEPA Method 8141A; and
- Chlorinated herbicides using USEPA Method 8151A;

Stockpile Soil Analytical Results

Soil sampling analytical results for selected TPH/VOCs, metals, OCPs, and PAHs are presented in Tables 1, 2, 3, and 4, respectively and are also discussed below. No SVOCs, PCBs, organophosphorus pesticides, or chlorinated herbicides were detected in any of the samples. A copy of the full laboratory report is included as Attachment 1.

TPH in Soil

TPH was detected in all five of the samples analyzed. TPH was encountered in the gasoline carbon chain range (C_6-C_{12}), the diesel carbon chain range (C_{13}-C_{22}), and the heavy oil carbon chain range (C_{23}-C_{44}). None of the TPH detections exceeded any of the USEPA Regional Screening Limits (RSLs) or DTSC Screening Levels (SLs) for residential soil.

VOCs in Soil

Acetone was detected in two of the five samples analyzed, with a maximum detection of 31 micrograms per kilogram (µg/kg). This is several orders of magnitude below the USEPA RSL for acetone in residential soil of 70,000,000 µg/kg (Table 1).

Metals in Soil

Several Title 22 metals were detected in all five of the samples analyzed. With the exception of arsenic, all metals detections were below their corresponding USEPA RSLs and DTSC SLs for residential soil (Table 2). Naturally occurring arsenic is prevalent in soils throughout California at concentrations exceeding the USEPA RSL of 0.68 mg/kg and the DTSC RL of 0.1 mg/kg for residential soil. In lieu of these screening levels, arsenic concentrations will be compared to 12 mg/kg, as recommended in the 2008 DTSC publication *Determination of a Southern California Regional Background Arsenic Concentration in Soil*. None of the arsenic detections were found in excess of this background concentration.

OCPs in Soil

Several OCPs were detected in all five of the samples analyzed. All OCP detections were below their corresponding USEPA RSLs and DTSC SLs for residential soil (Table 3).

PAHs in Soil

Several PAHs were detected in all five of the samples analyzed. All PAH detections were below their corresponding USEPA RSLs and DTSC SLs for residential soil (Table 4).

Conclusion and Recommendations

Roux has sampled and comprehensively analyzed soil samples representative of the stockpiled material on Site as indicated on Figure 2. Laboratory analysis has shown that none of the soil samples contained concentrations of any environmental constituents in excess of USEPA RSLs or DTSC SLs for residential soil (with the exception of arsenic, which was below the accepted, naturally occurring background level for California).

Roux recommends that from an environmental perspective, the stockpiled soil can be re-used on or off Site without restriction.

Closing

Should you have any questions or require further information regarding this Proposal, please do not hesitate to contact Jaydeep Purandare by telephone at (949) 244-6505 or by email at jpurandare@rouxinc.com or Chris Rose at (949) 413-2748 or by email at crose@rouxinc.com.

Sincerely,

ROUX ASSOCIATES, INC.

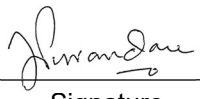
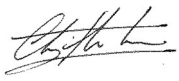
Jaydeep Purandare, P.E.	11/29/2022	
Principal Engineer	Date	Signature
Chris Rose, P.E.	11/29/2022	
Senior Engineer	Date	Signature

Table 1 - Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOCs) in Soil
Table 2 - Metals in Soil
Table 3 - Organochlorine Pesticides (OCPs) in Soil
Table 4 - Poly Aromatic Hydrocarbons (PAHs)

Figure 1 – Site Location Map
Figure 2 – Soil Stockpile Sampling Locations

TABLES

Table 1

Total Petroleum Hydrocarbons (TPH) and Volatile Organic Compounds (VOCs) in Soil (USEPA Method 8015B and 8260B)

5780 - 5790 Quarry Road, Bonita, California 91902

Sample ID	Date	C6-C12	C13-C22	C23-C44	Acetone	All Other VOCs
Analytical Method		USEPA 8015B			USEPA 8260B	
Unit		milligrams per kilogram (mg/Kg)			micrograms per kilogram (µg/kg)	
USEPA Residential Soil RSL		82	96	2,400	70,000,000	--
DTSC Residential Soil RSL		NS	97	2,400	NS	--
USEPA Industrial Soil RSL		420	440	30,000	1,100,000,000	--
DTSC Commercial/Industrial Soil SL		NS	500	18,000	NS	--
Composite-1 (Comp-1,2)	10/25/2022	<5.0	<5.0	**24**	**11**	**ND**
Composite-2 (Comp-3,4)	10/25/2022	**4.3 J**	ND	**40**	**31**	**ND**
Composite-3 (Comp-5,6)	10/25/2022	**5.5**	ND	**31**	<20	**ND**
Composite-4 (Comp-7+Comp-8)	10/25/2022	**4.8 J**	**6.3**	**46**	<20	**ND**
Composite-5 (Comp-9,10)	10/25/2022	**5.7**	**7.4**	**110**	<20	**ND**

Note:

C6-C12 = TPH in Carbon chain C6-C12 (Gasoline Range Organics)

C13-C22 = TPH in Carbon chain C13-C22 (Diesel Range Organics)

C23-C44 = TPH in Carbon chain C23-C44 (Oil Range Organics)

USEPA = United States Environmental Protection Agency

USEPA RSL = USEPA Regional Screening Level for Industrial Soil (updated 11/2021)

DTSC = Department of Toxic Substances Control

DTSC SL = CA Department of Toxic Substances Control Human and Ecological Risk Office Human Health Risk Assessment Note 3 Screening Level for Commercial/Industrial Soil (updated 6/20)

SFBRWQCB Industrial/Construction Worker/Nuisance ESL = San Francisco Bay Regional Water Quality Control Board Environmental Screening Levels for Soil (January 2019) Rev. 2

*DTSC SLs for TPH are based on carbon chain ranges C9-C16 and C17-C32

NS = No applicable screening level

Bold indicates concentration detected above laboratory reporting limits

<X indicates not detected above laboratory reporting limit shown

J = Estimated value

Table 2
Metals in Soil (USEPA Method 6010B/7471A)
5780 - 5790 Quarry Road, Bonita, California 91902

Sample ID	Date	Antimony	Arsenic	Barium	Beryllium	Cadmium	Chromium	Cobalt	Copper	Lead	Molybdenum	Nickel	Selenium	Silver	Thallium	Vanadium	Zinc	Mercury
Analytical Method		USEPA 6010B																USEPA 7471A
Unit		milligrams per kilogram (mg/Kg)																
Typical Range for California Soils[1]		0.15-1.95 mean = 0.60	12.0*	133-1400 mean = 509	0.25-2.70 mean = 1.28	0.05-1.7 mean = 0.36	23-1579 mean = 122	2.7-46.9 mean = 14.9	9.1-96.4 mean = 28.7	14.3-107.9 mean = 48.5	0.1-9.6 mean = 1.3	9-509 mean = 57	0.015-0.430 mean = 0.058	0.10-8.30 mean = 0.80	0.42-1.10 mean = 0.56	39-288 mean = 112	88-236 mean = 149	0.10-0.90 mean = 0.26
USEPA Residential Soil RSL		31	0.68	15,000	160	7.1	NS	23	3,100	400	390	1,500	390	390	0.78	390	23,000	11
DTSC Residential Soil SL		NS	0.1	NS	16	7.1	NS	NS	NS	80	NS	820	NS	NS	NS	NS	NS	1
USEPA Industrial Soil RSL		470	3.0	230,000	2,300	120	1,800,000	350	47,000	800	5,800	22,000	5,800	5,800	12	5,900	NS	46
DTSC Commercial/Industrial Soil SL		NS	0.36	NS	230	79	NS	NS	NS	500	NS	11,000	NS	NS	NS	NS	NS	4.4
Composite-1 (Comp-1,2)	10/25/2022	<10.20	**1.70 J**	**67.3**	**0.330 J**	<0.51	**13.5**	**5.44**	**7.93**	**3.69**	<2.03	**5.28**	<3.05	<1.52	<10.20	**35.3**	**27.5**	**0.0239 J**
Composite-2 (Comp-3,4)	10/25/2022	<10.20	**1.87 J**	**68.7**	**0.355 J**	**0.152 J**	**11.8**	**5.32**	**11.5**	**20.8**	<2.03	**5.27**	<3.05	<1.52	<10.20	**32.4**	**56.5**	**0.0750 J**
Composite-3 (Comp-5,6)	10/25/2022	<10.10	**2.21 J**	**54.1**	**0.240 J**	<0.51	**9.86**	**3.16**	**6.48**	**6.24**	<2.02	**2.89**	<3.03	<1.52	<10.10	**18.3**	**27.7**	**0.0304 J**
Composite-4 (Comp-7+Comp-8)	10/25/2022	<10.10	**2.11 J**	**71.9**	**0.201 J**	**0.188 J**	**11.3**	**4.31**	**11.0**	**15.9**	<2.01	**4.17**	<3.02	<1.51	<10.10	**27.1**	**61.9**	**0.0614 J**
Composite-5 (Comp-9,10)	10/25/2022	<10.20	**3.11**	**35.2**	**0.457 J**	<0.51	**41.9**	**3.30**	**11.3**	**11.0**	**2.51**	**5.23**	<3.05	<1.52	<10.20	**77.4**	**22.3**	**0.0371 J**

Note:
[1]Typical Range for California Soils - Bradford, G.R., Chang, A.C., Page, A.L., Bakhtar, D., Frampton, J.A., and Wright, H., 1996, Background Concentrations of Trace and Major Elements in California Soils, Kearney
* = Upper-bound background concentrations from Chernoff G., Bosan W., and Outiz D., DTSC, Determination of a Southern California Regional Background Arsenic Concentration in Soil
USEPA = United States Environmental Protection Agency
USEPA RSL = USEPA Regional Screening Level for Industrial Soil (updated 11/2021)
DTSC = Department of Toxic Substances Control
DTSC SL = California Department of Toxic Substances Control Human and Ecological Risk Office Human Health Risk Assessment Note 3 Screening Level for Commercial/Industrial Soil (updated 6/2020)
NS = no screening level available
Bold indicates concentration exceeds laboratory reporting limits
<X indicates analyte not detected above laboratory reporting limit shown

Table 3

Organochlorine Pesticides (OCPs) in Soil (USEPA Method 8081A)

5780 - 5790 Quarry Road, Bonita, California 91902

Sample ID	Date	4,4'-DDT	alpha-Chlordane	Chlordane	Dieldrin	gamma-Chlordane	Heptachlor epoxide	4,4'-DDD	4,4'-DDE	All Other OCPs
Analytical Method		USEPA 8081A								
Unit		micrograms per kilogram (µg/Kg)								
USEPA Residential Soil RSL		1,900	3,600	1,700	34	3,600	70	190	2,000	--
DTSC Residential Soil SL		1,900	NS	1,700	34	NS	70	2,300	2,000	--
Composite-1 (Comp-1,2)	10/25/2022	**12**	<5.0	<25	**4.9 J**	<5.0	<5.0	<5.0	**22**	ND
Composite-2 (Comp-3,4)	10/25/2022	**15**	**2.5 J**	**9.4 J**	**1.6 J**	<4.9	<4.9	**5.5 p**	**33**	ND
Composite-3 (Comp-5,6)	10/25/2022	**15 p**	<5.0	<25	<5.0	<5.0	<5.0	**8.8**	**120 E**	ND
Composite-4 (Comp-7+Comp-8)	10/25/2022	**83**	**70**	**160 p**	**9.4 p**	**37**	**15**	**27**	**210**	ND
Composite-5 (Comp-9,10)	10/25/2022	<5.0	**3.7 J p**	**25 p**	<5.0	**6.2**	**0.70 J p**	<5.0	<5.0	ND

Note:

USEPA = United States Environmental Protection Agency

USEPA RSL = USEPA Regional Screening Level for Residential Soil (updated 11/2021)

DTSC = Department of Toxic Substances Control

DTSC SL = CA Department of Toxic Substances Control Human and Ecological Risk Office Human Health Risk Assessment Note 3 Screening Level for Residential Soil (updated 6/20)

NS = No screening level available

Bold indicates detection exceeds laboratory reporting limit

<X indicates analyte not detected above laboratory reporting limit shown

Only analytes with a detection in at least one sample are tabulated

J = Estimated value

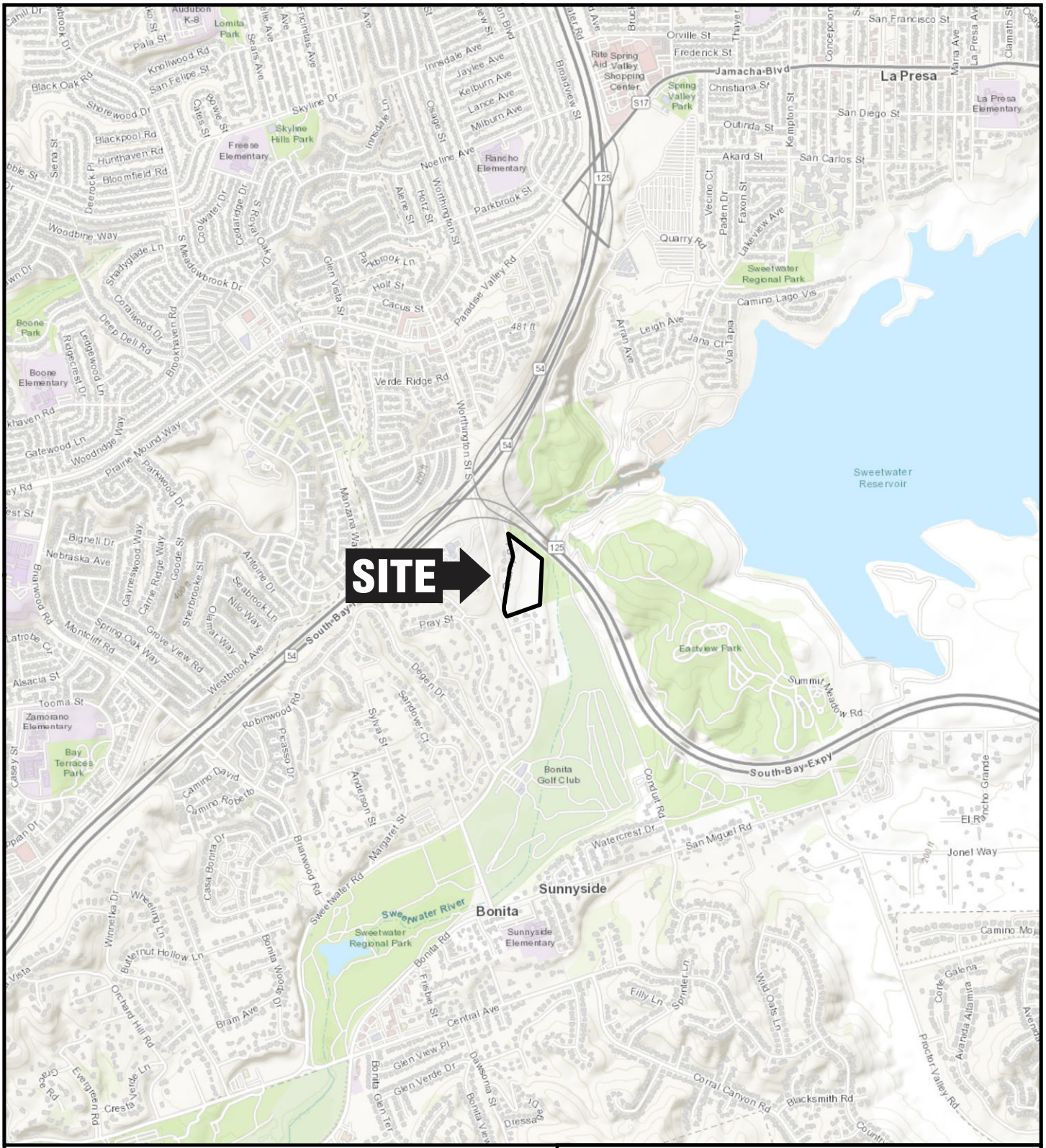
Table 4
Poly Aromatic Hydrocarbons (PAHs) in Soil (USEPA Method 8310)
5780 - 5790 Quarry Road, Bonita, California 91902

Sample ID	Date	Acenaphthene	Acenaphthylene	Anthracene	Benzo[a]anthracene	Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[g,h,i]fluoranthene	Benzo[k]fluoranthene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	Napthalene	Phenathrene	Pyrene
Analytical Method		USEPA 8310															
Unit		micrograms per kilogram (µg/Kg)															
USEPA Residential Soil RSL		3,600,000	NS	18,000,000	1,100	110	1,100	NS	11,000	110,000	110	2,400,000	2,400,000	1,100	2,000	NS	1,800,000
DTSC Residential Soil SL		3,300,000	NS	17,000,000	NS	110	1,100	NS	11,000	110,000	28	2,400,000	2,400,000	1,100	2,000	NS	1,800,000
Composite-1 (Comp-1,2)	10/25/2022	<15	<30	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<10	<15	<10	<10
Composite-2 (Comp-3,4)	10/25/2022	<15	<30	<10	**5.5 J**	**7.7 J**	**11**	<10	**8.3 J**	**13**	<10	**18**	<10	<10	<15	**6.5 J**	**25**
Composite-3 (Comp-5,6)	10/25/2022	<15	<30	<10	<10	**6.3 J**	**7.6 J**	**18**	**7.4 J**	**7.9 J**	**4.5 J**	**9.5 J**	**10**	<10	<15	<10	**9.0 J**
Composite-4 (Comp-7+Comp-8)	10/25/2022	<15	<30	<10	<10	<10	**6.3 J**	<10	**5.2 J**	**9.3 J**	<10	**14**	**4.7 J**	<10	<15	**5.5 J**	**21**
Composite-5 (Comp-9,10)	10/25/2022	<15	<30	<10	**4.3 J**	<10	**15**	<10	**5.3 J**	**9.5 J**	<10	**16**	**11**	<10	<15	**7.1 J**	**22**

Note:
USEPA = United States Environmental Protection Agency
USEPA RSL = USEPA Regional Screening Level for Residential Soil (updated 11/2021)
DTSC = Department of Toxic Substances Control
DTSC SL = CA Department of Toxic Substances Control Human and Ecological Risk Office Human Health Risk Assessment Note 3 Screening Level for Commercial/Industrial Soil (updated 6/20)
NS = No screening level available
Bold indicates detection exceeds laboratory reporting limit
Italics indicate sample is a duplicate sample
<X indicates analyte not detected above laboratory reporting limit shown

FIGURES

1. Site Location Map
2. Soil Stockpile Sampling Locations



QUADRANGLE LOCATION

N

1,000 0 1,000'

Title:

SITE LOCATION MAP

5780-5790 QUARRY ROAD
BONITA, CALIFORNIA

Prepared for: INSITE PROPERTY GROUP

ROUX

Compiled by: A.C.	Date: 11/14/22
Prepared by: A.C.	Scale: AS SHOWN
Project Mgr: C.R.	Project: 3370.XXXX
File: 3370.XXXX100.0.mxd	

FIGURE 1

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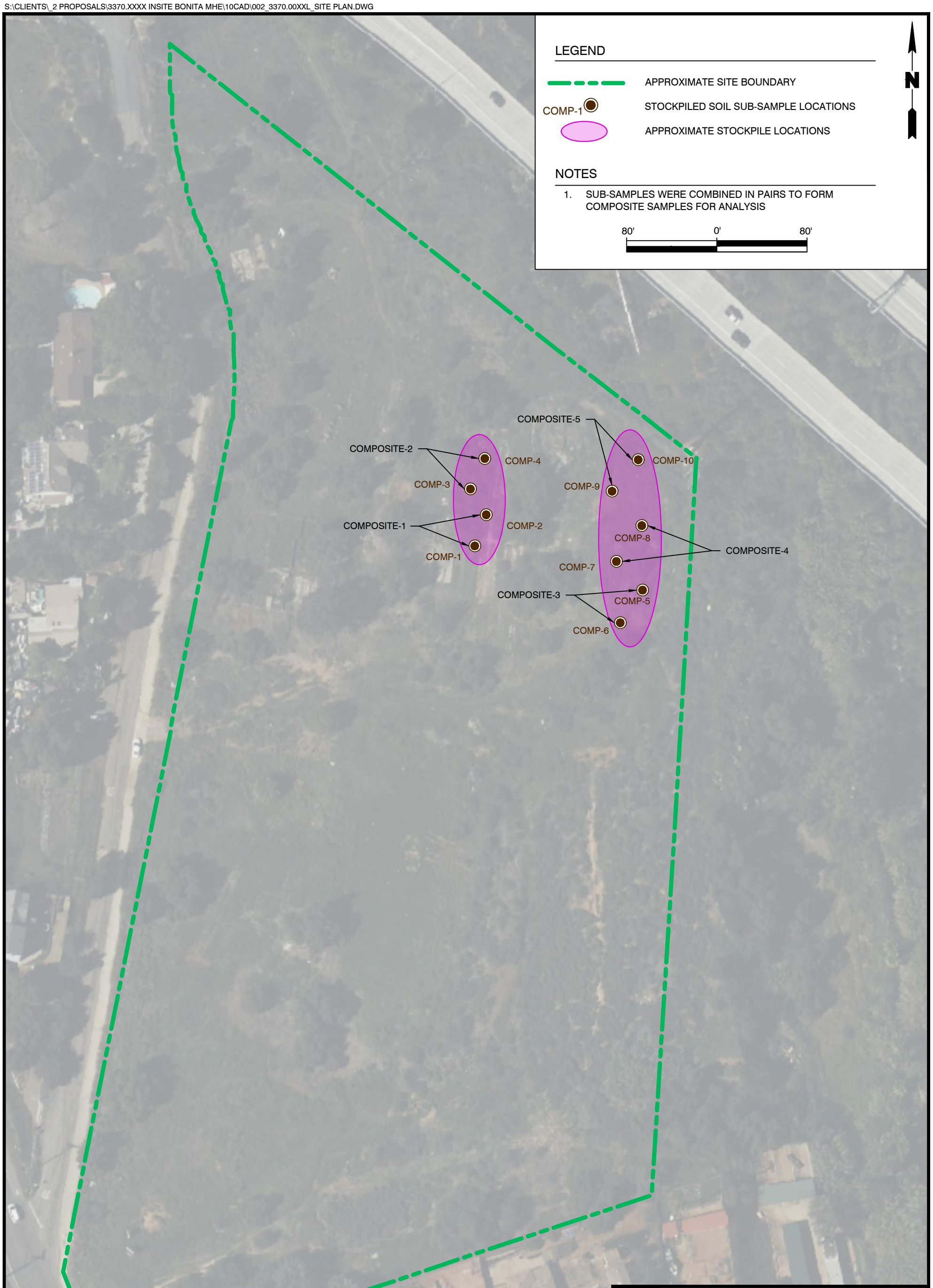

Title:

SOIL STOCKPILE SAMPLING LOCATIONS

5780-5790 QUARRY ROAD
BONITA, CALIFORNIA

Prepared For:

INSITE PROPERTY GROUP

ROUX

Compiled by:	CTR	Date:	2022-11-15	FIGURE
Prepared by:	CTR	Scale:	1" = 80'	2
Project Mgr:	JP	Project:	3370.XXXXL	
File:	002_3370.00XXL_Site Plan.dwg			