



## **Phase I Environmental Site Assessment**

5261 Arlington Avenue  
Riverside, California 92504

November 11, 2021

Foulger Pratt  
136 Calle de los Molinos  
San Clemente, CA 92672

Project Number 21-09-002

Prepared by:



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November 11, 2021

Jim Ivory  
Vice President, Development  
Foulger Pratt  
136 Calle de Los Molinos  
San Clemente, CA 92672

Subject: Phase I Environmental Site Assessment  
5261 Arlington Avenue  
Riverside, California 92504  
Project Number 21-09-002

Dear Mr. Ivory:

Weis Environmental, LLC has completed the contracted environmental consulting services for the above-referenced project. The services were performed in accordance with our proposal and agreement fully executed by all parties. The Phase I Environmental Site Assessment has been performed in accordance with ASTM International (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation E1527-13 and Title 40 of the Code of Federal Regulations (40 CFR) Part 312. We appreciate the opportunity to be of service to you on this project. Please contact us if you have any questions or comments regarding this report or if we can be of further assistance.

Sincerely,

Weis Environmental, LLC

A handwritten signature in black ink that reads "Daniel Weis". The signature is written in a cursive style and is positioned above a horizontal line.

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Daniel Weis, R.E.H.S.  
Environmental Manager

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## 1.0 INTRODUCTION

This report presents the methods and findings of a Phase I Environmental Site Assessment (ESA) of the property located at 5261 Arlington Avenue, in the City of Riverside, Riverside County, California (Site) performed in conformance with the contract/agreement for this assignment and the scope and limitations of ASTM Standard Practice E1527-13 and United States Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI) as published in 40 Code of Federal Regulations (CFR) Part 312. EPA promulgated the AAI rule that became effective in November 2006 and has indicated that the ASTM E1527 practice is consistent with the requirements of AAI and may be used to comply with the provisions of the AAI rule.

### 1.1 Purpose

The purpose of the ASTM E1527 practice (framework for this Phase I ESA) is to define good commercial and customary practice in the United States of America for conducting an ESA of a parcel of real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (Title 42 United States Code (U.S.C.) Section 9601)) and petroleum products. As such, this practice is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (hereinafter, the “landowner liability protections,” or “LLPs”): that is, the practice that constitutes all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. Section 9601(35)(B).

In defining a standard of good commercial and customary practice for conducting this Phase I ESA of the Site, the goal of the processes established by the ASTM E1527 practice is to identify, to the extent feasible, recognized environmental conditions. The term recognized environmental conditions is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. In addition, controlled recognized environmental conditions, historical recognized environmental conditions, and/or de minimis conditions, if identified during the completion of the assessment, are discussed herein. Definitions of these terms and other key terminology relevant to the practice are included in Section 14.0 of this report.

### 1.2 Scope of the Assessment

In general terms, this Phase I ESA included the acquisition of readily available/accessible and practically reviewable regulatory records and historical information, a site reconnaissance, interviews, and preparation of this written report of findings. A more detailed description of the four primary components of the Phase I ESA is presented below.

**Records Review** - A review of Federal, State, Tribal, and local standard ASTM and non-ASTM regulatory databases for a myriad of environmental identifiers including but not limited to properties with underground storage tanks (USTs), properties with leaking USTs, properties that have reported spills/releases that did not occur from a leaking UST, businesses that utilize hazardous materials, and/or generate hazardous waste and hazardous waste disposal locations. The regulatory review may also include public records requests with one or more Federal, State, Tribal and/or local agencies. A review



of historical sources is also completed to help ascertain previous land uses of the property in question and in the surrounding area.

**Site Reconnaissance** - A property inspection and viewing of adjacent and surrounding properties for conditions that could be recognized environmental conditions.

**Interviews** - Interviews with present and past owners, operators and/or occupants of a property and local government officials.

**Reporting** - Evaluation of the information gathered during the completion of the Phase I ESA and the subsequent preparation of a written report.

### 1.3 Limitations and Exceptions

Concerns regarding liability under the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. 9601 et seq. (CERCLA) and analogous State laws, have been a primary driver for Phase I ESA assignments in commercial real estate transactions. While the ASTM E1527 practice can be used in many contexts, a familiarity with CERCLA and its potential LLPs is critical in understanding and applying the ASTM E1527 practice. We advise consultation with legal counsel if further inquiry or information is desired.

AAI represents the minimum level of inquiry necessary to support the LLPs. However, it is important to understand that additional inquiry ultimately may be necessary or desirable for legal as well as business reasons depending upon the outcome of this inquiry and the particular risk tolerances of a given user. For example, additional inquiry may assist a user of a Phase I ESA in determining whether he or she would have continuing obligations in the event he or she acquires a given property and may also assist the user in defining the scope of future steps to be taken to satisfy such obligations. In addition, a user may be concerned about business environmental risks or non-scope ASTM considerations that do not fall within the definition of a recognized environmental condition. In addition, this assessment did not include subsurface or other invasive exploration. Users are also cautioned that Federal, State, Tribal and local laws may impose environmental assessment obligations that are beyond the scope of the ASTM E1527 practice.

The evaluation, opinion, and conclusions presented herein are based solely on visual observations and regulatory, historical, and personal knowledge related information that existed at the time our assessment was completed. The use of the gathered information is exclusively for the purposes outlined in this report and only for the Site. Our firm can make no warranty, either express or implied, except that the services conducted were performed in accordance with generally accepted environmental assessment practices applicable at the time and location of the assessment and that the conclusions of the assessment have been based in part on professional judgment/experience, an interpretation of readily available data, and the standard of care normally followed by similar professionals practicing in a similar locale and under similar circumstances. Any opinions presented cannot apply to Site changes of which our firm is unaware and has not had the opportunity to evaluate. In addition, this report cannot feasibly include any evaluation of undocumented activities at the Site or on adjacent or nearby properties. Lastly, a Phase I ESA meeting or exceeding this practice and completed less than 180 days prior to the date of acquisition of a given property or (for transactions not involving an acquisition) the date of the intended transaction is presumed to be valid.



## **1.4 Special Terms and Conditions**

This Phase I ESA was prepared in accordance with the terms and conditions of the contract/agreement for the work as executed between our firm and the client. There are no other special terms and conditions established between our firm and the client pertinent to the findings of this ESA or methodology used to complete this assessment. In addition, our firm has no final or other vested interest in the Site or adjacent/surrounding properties, or in any entity that owns or occupies the Site or adjacent/surrounding properties.

## **1.5 Limiting Conditions and Deviations**

There were no significant limiting conditions that would inhibit our ability to identify recognized environmental conditions noted during the completion of this assessment. In addition, there were no deviations from the ASTM E1527 standard noted during the completion of this assessment. Any limiting conditions that are not considered to be ones that would inhibit our ability to identify recognized environmental conditions at the Site are referenced in applicable sections of this report.

## **1.6 Data Failure and Data Gaps**

No instances of data failure were encountered during the completion of this assessment. In addition, no data gaps of significance (i.e. those that would inhibit our ability to identify recognized environmental conditions) were identified during the completion of this assessment. Any data gaps that are not considered to be ones that would inhibit our ability to identify recognized environmental conditions at the Site are referenced in applicable sections of this report.

## **1.7 Reliance**

This report has been prepared for the exclusive use of our client. This report may not be relied upon by any other person or entity without the written consent of both our firm and our client. The scope of services performed for this assessment may not be appropriate to satisfy the specific needs of other users, and any use or reuse of this document would be at the sole risk of said users. Any other party seeking liability protection under CERCLA must take independent action to accomplish its objective.



## 2.0 SITE DESCRIPTION

### 2.1 Location and Legal Description

The Site is a reported 17.43 acres (759,250 square feet), is addressed as 5261 Arlington Avenue, and is further identified by County of Riverside Assessor's Parcel Number (APN) 226-180-015. The Site is located north of Arlington Avenue and east of Streeter Avenue in the City of Riverside, California. A Vicinity Map is included as Figure 1. A Site Plan is included as Figure 2.

### 2.2 Site and Vicinity Characteristics

The Site and the surrounding vicinity are situated in the City of Riverside that consists primarily of commercial and residential properties and public roadways. Additional details pertaining to the Site and its adjoining properties are provided in the sections below.

### 2.3 Current Use of the Site

The Site is currently developed with a single-story department store structure with basement level occupying the central portion of the property and an single-story automotive center with basement level in the western portion of the property. The department store structure is vacant except for the southeastern portion of the ground level which is temporarily occupied by Spirit Halloween. The automotive service structure is vacant. The two on-Site structures were formerly occupied by a Sears department store and Sears Auto Center. It is our understanding that the Site is planned for future redevelopment which will include demolition and conventional grading (i.e., removal and recompaction of soil) and a change in land use to residential.

### 2.4 Description of Site Improvements

There are two commercial buildings located on the Site. The central building is an approximate 170,000-square foot vacant department store structure. The interior of the vacant department store building includes retail areas, warehouse and supply storage areas, sub-grade basement areas, public and freight hydraulic elevators, and restrooms. The basement area contains a disconnected boiler, trash compactor, and emergency generator. A smaller, approximately 28,000-square foot automotive service structure is located on the western portion of the property. This building includes six bay doors opening to a concrete-paved former service area with secondary containment structures, nine hydraulic hoists, and a sub-grade oil/water separator. The construction date of the two structure is likely the early- to mid-1960s based on review of historical documentation. The Site formerly contained a vehicle fueling island with three 10,000-gallon gasoline USTs which were removed in 1985 and seven 1,000 to 2,000-gallon oil and waste oil USTs removed in 1987; the fueling station island and distribution lines were removed in 1994. The balance of the remaining Site property comprises asphalt-paved parking areas, driveways, and minor landscaping.

Access to the Site is provided from Arlington Avenue and Streeter Avenue along the southern and western sides of the property, respectively. Indicators of various utility systems are present throughout the Site, primarily adjoining the building exteriors and along the Site perimeter. A higher level of confidence regarding the nature of extent of surface indicators of subsurface features can be obtained from a utility or geophysical consultant.



## 2.5 Utilities

Utilities that are reported to be present at the Site or provide service in the surrounding area are noted below along with their municipal provider where applicable. If certain utility systems are not provided by public agencies or entities, they are noted as privately maintained.

Utility	Provider (Where Applicable)
Potable Water	Riverside Public Utilities
Sewage Maintenance	Riverside Public Utilities
Electrical	Riverside Public Utilities
Natural Gas	Southern California Gas
Solid Waste Disposal	City of Riverside

## 2.6 Description of Adjoining Properties

Adjoining properties are defined as any real property or properties, the border of which is contiguous or partially contiguous with that of the subject property of a Phase I ESA, or that would be contiguous or partially contiguous with that of a subject property but for a street, road, or other public thoroughfare separating them. To the extent feasible, our firm performed a visual inspection of adjoining properties from the Site boundaries and along public right of ways. We did not encroach on to adjoining private property during the completion of this assessment. The following table identifies the adjoining property uses:

Direction	Adjoining Property Use
North	Residential properties with a chiropractic office to the northwest.
East	Residential properties.
South	Arlington Avenue then commercial properties.
Southwest	Bank of America property.
West	Streeter Avenue then primarily residential properties. A Chevron service station is located west of the Bank of America property.



### 3.0 PHYSICAL SETTING

#### 3.1 Topography

The Site is depicted on the United States Geological Survey (USGS) topographic map for the Riverside West 7.5-minute quadrangle. The Site is shown on the map as being situated at an elevation of approximately 780 feet above mean sea level. The Site and surrounding area appear relatively level with a slight gradient to the west. There are no improvements, structures or surface waters depicted on-Site on the map. Adjoining and surrounding roadways are depicted on the map. The Site as depicted on a topographic map is included as Figure 3.

#### 3.2 Hydrology

The Site is situated within the Middle Santa Ana River Basin. There are no known substantial hydrologic features at the Site including major storm drain inlets or obvious drainages, channels, or surface waters. Due to the substantial amount of current paving at the Site, infiltration of precipitation to the Site is likely to be relatively minor. Currently, excess water appears to flow generally north and west as surface runoff to on-Site storm drains located in the parking areas and near the Site perimeter. On-Site storm drains appear to discharge to the municipal stormwater conveyance system. The Site does not appear to receive significant drainage from off-Site properties.

#### 3.3 Geology

General geologic information pertaining to the Site is presented in the table below.

Geologic Consideration	Details
California Geomorphic Province	Peninsular Ranges.
Mapped Soils or Formation	The Site is underlain by holocene and pleistocene-age unconsolidated sand and pebble- to gravel-sand alluvial fan deposits.
Description of Soils or Formation	According to lithological descriptions provided during prior subsurface investigative work, the Site is underlain by dark brown sandy clay and olive brown sandy silt to approximately 21 feet below ground surface and olive brown poorly graded sand to 35 to 45 feet below ground surface.
Distance/Direction to Mapped Faults	Mapped unnamed faults within the western portion of the San Jacinto Fault Zone are located approximately eight miles east of the Site.

#### 3.4 Hydrogeology

General hydrogeologic information pertaining to the Site is presented in the table below.

Hydrogeologic Consideration	Details
Groundwater Basin or Unit	Upper Santa Ana Valley groundwater basin. Riverside-D Groundwater Management Zone.
Beneficial Uses	Municipal and domestic supply, agricultural supply, industrial service supply, and industrial process supply.



<b>Hydrogeologic Consideration</b>	<b>Details</b>
Estimated Depth to Groundwater	Based on previous subsurface investigative work, depth to groundwater is approximately 25 to 30 feet below ground surface.
Estimated Flow of Groundwater	Northwest.
Known Site or Regional Groundwater Contamination Issues	Previous subsurface assessments identified petroleum impacts associated with former hydrocarbon USTs and chlorinated solvents potentially associated with an up-gradient off-Site former dry cleaning operation.

### 3.5 Oil and Gas Exploration

According to online resources provided by the California Department of Conservation, Geologic Energy Management Division (CalGEM), there are no oil, gas or geothermal wells located on the Site or its adjacent properties.



## 4.0 USER PROVIDED INFORMATION

A representative of the user of this report (Foulger Pratt) was interviewed during the completion of this assessment. The questions posed during the interview are defined by the ASTM E1527 practice. The client also provided our firm with any land title records and judicial records that may be available for the Site as part of the required evaluation for environmental liens and activity and use limitations (AULs) in connection with the subject property of a Phase I ESA. As stated in the ASTM E1527 practice, it is the responsibility of the user of the report to provide any available records pertaining to environmental liens and AULs that may exist in connection with a given property. Any land title and judicial recorded provided to our firm are discussed below. If such information is not discussed in the sections below, it was not provided by the user of the report.

In addition to the contact information obtained, the user of the report was also asked if they are aware of other useful documents that may exist and if so whether copies can be provided to the environmental professional within reasonable time and cost constraints. A list of typical useful documents is included in Section 10.8.1 of the ASTM E1527 practice and include but are not limited to environmental assessment reports, compliance audits and permits, registrations for tank and other aboveground or underground systems, safety plans, spill prevention and other facility related plans and geological/geotechnical studies and environmental governmental agency notices, and/or correspondence. The user provided prior Phase I and II ESAs performed at the Site by Terracon dated December 18, 2014, and April 7, 2015, and an asbestos survey performed at the Site by Watterson dated March 3, 2020. Additionally, the user provided email correspondence with the SA-RWQCB concerning planned future Site development.

### 4.1 Title Records

Our firm was not provided with title records pertaining to the Site.

### 4.2 Environmental Liens

The client is unaware of environmental liens in connection with the Site.

### 4.3 Activity and Use Limitations

The client is unaware of AULs in connection with the Site.

### 4.4 Specialized or Actual Knowledge or Experience

The client provided email correspondence with the Santa Ana Regional Water Quality Control Board (SA-RWQCB) concerning future Site development, land use changes, and potential oversight. Relevant findings and requirements include:

- A “No Further Action” letter was issued by the SA-RWQCB for former on-Site petroleum hydrocarbon USTs in 2003. The letter included a requirement that the SA-RWQCB be contacted and findings/recommendations reevaluated should land use change be proposed for the Site.
- An oversight agreement between the developer and the SA-RWQCB would be needed for consideration of land use changes relative to environmental constraints.



- Existing supplemental documentation (e.g., prior Phase I and II ESAs) have been provided to the SA-RWQCB for review.
- The developer will prepare a work plan detailing any data gaps and a proposed scope of work for SA-RWQCB review and approval.
- The future work plan is expected to include a soil gas investigation beneath existing structures, soil gas plume delineation to non-detect or 2019 environmental screening levels as established by the San Francisco Bay RWQCB, and a minimum of two rounds of indoor air sampling during at least two different seasons.
- Following implementation of the work plan, a written report of findings will be prepared for SA-RWQCB and Office of Environmental Health Hazard Assessment review and approval.
- The report of findings will include a human health risk assessment and proposed implementation of remedial strategies and mitigation measures.

#### **4.5 Commonly Known or Reasonably Ascertainable Information**

The client is unaware of commonly known or reasonably ascertainable information within the local community that is material to recognized environmental conditions in connection with the Site.

#### **4.6 Valuation Reduction for Environmental Issues**

The client is unaware of information pertaining to an undervalued purchase price of the Site relative to the estimated fair market value of the Site due to the presence of contamination.

#### **4.7 Owner, Property Manager, and Occupant Information**

The Site is owned by Seritage SRC Finance and is currently temporarily occupied by Spirit Halloween. Sears Roebuck & Co. (department store and automotive service center) was the Site occupant from the early to mid-1960s to mid-2010s.

#### **4.8 Reason for Performing Phase I ESA**

The client has commissioned this Phase I ESA as part of Site redevelopment. The Phase I ESA is also being completed to assist the client in complying with 40 CFR Part 312.

#### **4.9 Proceedings Involving the Site**

The client is unaware of pending, threatened, or past litigation and administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Site. The client is also unaware of notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products in connection with the Site.

#### **4.10 Other Provided Documents**

The following prior Phase I and II ESAs performed for the Site were provided by the client:

- Terracon. 2014. 1298 – Final Phase I ESA (12-18-14), Sears Store #1298 and Sear Auto Center #6711, 5261 Arlington Avenue, Riverside, Riverside County, California. December 18, 2014.



- Terracon. 2014. 1298 –Phase II ESA Report, 1298\_CA\_DD\_Final Phase II ESA Report, Sears Store #1298 and Sear Auto Center #6711, 5261 Arlington Avenue, Riverside, Riverside County, California. April 7, 2015.

Terracon prepared these reports on behalf of Sears Holdings Management Corporation. The Phase I ESA was performed in general accordance with ASTM Standard E1527-13 and consisted of a site reconnaissance, interviews with knowledgeable personnel, review of historical documentation, and review of federal, state, and local regulatory databases. Findings, relevant information, and conclusions presented in the Terracon Phase I ESA include:

- The Site was occupied by Sears and improved with two buildings, a retail department store and an automotive service center. Sears operations began in the early to mid-1960s; prior land use was agricultural.
- Ten USTs were formerly located on-Site: three 10,000-gallon gasoline USTs, one 1,000-gallon waste oil tank, four 1,000-gallon oil tanks, and two 2,000-gallon oil tanks. The tanks were associated with the auto center and a former fueling island located on the western portion of the property. The tanks were removed in 1985 and 1987 and the fueling island and associated distribution lines were removed in 1994.
- A leak was discovered during UST removal. Soil investigation and groundwater monitoring took place between 1993 and 2003. The SA-RWQCB granted regulatory closure for the UST release via a “No Further Action” letter dated June 26, 2003. The letter indicates that corrective action should be reviewed in the future if land use changes. Terracon determined that groundwater contaminants were present at the Site at concentrations exceeding regulatory risk-based groundwater screening levels (specifically total petroleum hydrocarbons [TPH] as gasoline, ethylbenzene, xylenes, and tetrachloroethene [PCE]). The former USTs were identified as a controlled recognized environmental condition.
- The automotive center oil/water separator was identified as a recognized environmental condition. Evidence supporting this conclusion included the long duration of automotive service (approximately 60 years at the time), unknown chemical usage, hazardous waste management disposal activities, lack of soil/groundwater data, and absence of continuous service records.
- PCE detected in groundwater was also identified as a recognized environmental condition. The Crown Cleaners facility located approximately 600 feet south (up-gradient) of the Site in the Heritage Plaza Shopping Mall was the location of a documented release and was identified as the likely source.
- 2002 Site asbestos abatement work included the removal of sheetrock joint compound, acoustic ceiling tile adhesive, vinyl floor tile, and flooring adhesive. Additional asbestos containing materials reportedly remains on Site.

Based on the above findings, a Phase II ESA was performed by Terracon. The general scope of work and associated findings and conclusions are as follows:

- On March 6, 2015, five direct push boring locations were advanced to a maximum depth of 45 feet below ground surface for co-located soil and groundwater sampling. Sample locations were chosen to characterize potential impacts related to the former on-Site UST system, the automotive center oil/water separator, and solvent releases from the up-gradient off-Site Crown Cleaners facility.



- TPH concentrations below the applicable Los Angeles RWQCB maximum screening levels and volatile organic compound (VOC) concentrations below the United States Environmental Protection Agency (USEPA) Region 9 Regional Screening Levels were detected in soil collected from the former UST and oil/water separator areas.
- PCE was detected in groundwater collected from each of the five locations at concentrations above the laboratory method detection limits but below the USEPA Region 9 Regional Screening Level.
- VOCs (specifically benzene, ethylbenzene, 1,2-dichloroethane, and total xylenes) were detected at concentrations greater than California Environmental Protection Agency (CalEPA) Maximum Contaminant Levels (MCLs) in groundwater collected from one location near the former fueling island and area. VOCs were also detected in groundwater collected near the automotive service center, but at concentrations below respective CalEPA MCLs.
- TPH (gasoline, diesel, and oil range fractions) was detected at concentrations above the San Francisco RWQCB Regional Environmental Screening Levels in the vicinity of the former USTs, oil/water separator, and southeast portion of the Site.



## 5.0 REGULATORY RECORDS REVIEW

Our firm commissioned the preparation of a regulatory database report from Environmental Risk Information Services (ERIS) as part of the regulatory records review. ERIS searches a myriad of Federal, State, and local government environmental databases during the preparation of their deliverables. Certain databases are specifically required by the ASTM E1527 practice and are referenced as “standard ASTM regulatory databases.” Such databases are searched to at least the minimum search distance around a given property as defined in the practice. Other regulatory databases are also searched that are not specifically referenced in ASTM E1527. Such databases are referenced as “non-ASTM regulatory databases” and are searched as varying radii around a given property as selected by ERIS.

Descriptions of each database searched and the dates that the regulatory databases were last updated by the applicable agencies are included in the ERIS report. The extent of historical information varies with each database and current information is determined by what is publicly available to ERIS at the time of an updates. ERIS updates databases in accordance with ASTM E1527 which states that government information from nongovernmental sources may be considered current if the source updates the information at least every 90 days, or, for information that is updated less frequently than quarterly by the government agency, within 90 days of the date the government agency makes the information available to the public.

Our firm also reviewed unplottable sites listed in the database report by cross-referencing reasonably ascertainable information pertaining to such properties that may include facility names, street names, zip codes or other information. Unplottable sites are ones that cannot be formally mapped or geocoded due to various reasons, including limited geographic information. Unplottable sites that we identify within the specified search radii have been evaluated as part of the preparation of this report. A copy of the regulatory database report is included in Appendix A.

### 5.1 Standard ASTM Regulatory Database Search

The tables below present the standard Federal, State, Tribal and local ASTM databases that were searched by ERIS including the search distances from the Site. Below the tables are descriptions of any listings for the Site that may appear in the databases. In addition, a discussion of adjoining properties or properties in the Site vicinity that are listed in one or more regulatory databases that in our professional judgment and opinion have the potential to adversely impact the Site due to current or former releases of hazardous substances and/or petroleum products that occurred at said properties is presented. This practice of discussing only properties of potential environmental concern to the Site is noted in ASTM E1527 which states that the environmental professional may make statements applicable to multiple properties listed in regulatory databases that are not likely to have current or former releases of hazardous substances and/or petroleum products with the potential to migrate to the a given subject property. Our professional judgment and opinions discussed herein are based on several factors including the nature of the regulatory database listings, distance of the off-Site listed properties from the Site, orientation of the listed properties relative to the Site, interpreted the direction of groundwater flow, and/or regulatory case status information for the various properties as described in the databases.



The following Federal standard ASTM databases were searched:

Standard Environmental Record Source Name	ERIS Regulatory Database Identification	Search Distance From Site (Miles)
National Priorities List (NPL) Site List	NPL – Proposed NPL – Superfund Record of Decision (ROD)	1.0
Delisted NPL Site List	Deleted NPL	0.5
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List	CERCLIS - SEMS – SEMS Archive – ODI – IODI	0.5
CERCLIS List	CERCLIS LIENS – SEMS LIEN	Site
CERCLIS No Further Remedial Action Planned (NFRAP) Site List	CERCLIS NFRAP	0.5
Resource Conservation and Recovery Act (RCRA) Corrective Action Sites (CORRACTS) Facilities List	RCRA CORRACTS – Department of Energy (DOE) Formerly Utilized Sites Remedial Action Program (FUSRAP)	1.0
RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) Facilities List	RCRA TSD	0.5
RCRA Generators List	RCRA LQG – RCRA SQG – RCRA VSQG – RCRA NON GEN – BULK TERMINAL – REFN – FEMA UST – Facility Response Plan (FRP) – HIST GAS STATIONS	0.25
Institutional Control/Engineering Control Registries	FED ENG – FED INST – FED Brownfields – Land Use Control Information System (LUCIS)	0.5
Emergency Response Notification System (ERNS) List	ERNS – ERNS 1982 to 1986 – ERNS 1987 to 1989	Site

**Site** –Sears No. 1298/6711 is listed at 5261 Arlington Avenue in the RCRA NON GEN database. The records identify Sears as an implementor not a generator. The RCRA NON GEN database identifies persons or sites that do not presently generate hazardous waste. No spills or violations are noted.

**Adjoining Properties** – Adjoining properties are listed on the RCRA SQG and RCRA NON GEN standard Federal ASTM regulatory databases.

- Chevron Station at 5305 Arlington Avenue is listed on the RCRA SQG database which identifies generators of small quantities of hazardous waste. Records indicate Chevron generated ignitable and benzene-containing wastes. There are no spills, monitoring, enforcement, or violations associated with this facility in this listing. This property is not considered to be a significant environmental concern to the Site.
- Jones Dry Cleaners at 5335 Arlington Avenue is listed on the RCRA SQG database which identifies generators of small quantities of hazardous waste. The record identifies a 1993 facility inspection. There are no spills, monitoring, enforcement, or violations associated with



this facility in this listing. This property is not considered to be a significant environmental concern to the Site.

- USA #1 Photo at 5222 Arlington Avenue Suite D in the southern adjoining Heritage Plaza Shopping Mall is listed on the RCRA SQG database which identifies generators of small quantities of hazardous waste. Specific wastes are not identified in this listing. There are no spills, monitoring, enforcement, or violations associated with this facility in this record. This property is not considered to be a significant environmental concern to the Site.
- Smart & Final #514, Saloncentric Inc., and R & T Oil Inc. at 5202, 5222, and 5305 Arlington Avenue, respectively, are listed on the RCRA NON GEN database. The RCRA NON GEN database identifies persons or sites that do not presently generate hazardous waste. No spills or violations are noted. This property is not considered to be a significant environmental concern to the Site.

**Other Properties** – There are 20 listings pertaining to multiple properties in the surrounding area that are identified on various databases including RCRA TSD (two listings), RCRA SQG (two listings), and RCRA NON GEN (16 listings). These properties are not considered to be significant environmental concerns to the Site.

The following State, Tribal, and local standard ASTM databases were searched:

Standard Environmental Record Sources Name	ERIS Regulatory Database Identification	Search Distance From Site (Miles)
Equivalent NPL	RESPONSE	1.0
Equivalent CERCLIS	ENVIROSTOR – DELISTED ENVS – HWP – HHSS	0.5
Landfill and/or Solid Waste Disposal Site Lists	SWF/LF – LDS – SWAT – SWRCB SWF – Construction and Demolition (C & D) DEBRIS RECY – CONTAINER RECY – RECYCLING – PROCESSORS	0.5
Leaking Storage Tank Lists	LUST – DELISTED LST – UST CLOSURE – CLEANUP SITES – INDIAN LUST – DELISTED ILST – LOP RIVERSIDE	0.5
Registered Storage Tank Lists	UST – AST – AST SWRCB – TANK OIL GAS – DELISTED TNK – CERS TANK – DELISTED CTNK – HIST TANK – UST SWEEPS – INDIAN UST – DELISTED IUST – DELISTED COUNTY – UST RIVERSIDE	Site and Adjoining Properties
Institutional Control/Engineering Control Registries	LUR – HLUR - DEED	Site
Voluntary Cleanup Sites	VCP	0.5
Brownfield Sites	CALSITES	0.5



**Site** –The Site is listed on the following the State, Tribal, and local standard ASTM regulatory databases: LUST, HHSS, DELISTED CTNK, HIST TANK, and LOP RIVERSIDE. Historical tank listings indicate that 10 USTs were installed on-Site in 1964: three 10,000-gallon fuel tanks, one 500-gallon waste oil tank, and six 1,000- to 2,000-gallon product/oil tanks. The fuel tanks were removed in 1985, the oil tanks were removed in 1987, and the fueling island and associated distribution lines were removed in 1994.

Listings identify that in June 1985, leakage from on-Site gasoline USTs was detected during tank removal and closure activities. In 1988, the leakage case was referred to the SA-RWQCB. Six groundwater monitoring wells were installed in 1985; these wells were abandoned in 1992 when four new wells were installed. Five more wells were installed, and quarterly groundwater monitoring began in 1993. Remedial activities reportedly included removal of free product and impacted soil. A “No Further Action” letter indicating regulatory closure for the release was issued on June 26, 2003. The letter indicates that corrective action should be reviewed in the future if land use changes.

**Adjoining Properties** – Adjoining properties are listed on the following State, Tribal, and local standard ASTM regulatory databases: RECYCLING, CLEANUP SITES, VCP, ENVIROSTOR, DELISTED TNK, LUST, HHSS, UST, CERS TANK, HIST TANK, UST SWEEPS, LOP RIVERSIDE and UST RIVERSIDE

- Alexys Recycling at 5204 Arlington Avenue in the southern adjoining Heritage Plaza Shopping Mall is listed on the RECYCLING database. This database is a list of certified recycling centers that are operating under the State of California’s Beverage Container Recycling Program. There are no spills, monitoring, enforcement, or violations associated with this facility in this record. This property is not considered to be a significant environmental concern to the Site.
- Crown Cleaners at 5190 Arlington Avenue in the southern adjoining Heritage Plaza Shopping Mall is listed on the CLEANUP SITES, VCP, and ENVIROSTOR databases. Listings identify a leak at this facility discovered on February 1, 2003, and reported on April 25, 2003. Remediation via excavation of PCE-impacted soil (defined as soil containing 1.5 parts per million [ppm] PCE or greater) was reported on July 1, 2003. The excavation took place beneath the former dry cleaning equipment and the adjacent suite to a depth of nine feet below ground surface; PCE was not detected above 1.5 ppm in excavation confirmation samples. Case closure was provided via a “No Further Action” letter from the SA-RWQCB on October 7, 2003. On December 9, 2019, a standard voluntary cleanup agreement was entered into by the Tarski Group, LLC with the CalEPA Department of Toxic Substances Control (DTSC) for the Crown Cleaners site. A Preliminary Environmental Assessment Report, approved on March 26, 2020, identified PCE impacts at the facility and recommended additional investigation and/or remediation. A supplemental site investigation evaluating the nature and extent of contamination was completed on March 31, 2021. The supplemental evaluation concluded that human receptor exposure pathways via dermal contact with soil and volatilization from soil to soil gas were potentially complete; the exposure pathway from soil to groundwater to a human receptor was not considered complete due to the reportedly low concentrations (less than the MCL) of PCE in groundwater. Groundwater sample results were not available for review. As described in Section 4.0, potential contaminant migration from the Crown Cleaners facility to the Site was considered and evaluated in the 2015 subsurface evaluation of the Site. Subsequent investigations of the Crown Cleaners facility have identified PCE-impacted environmental media; however, only low groundwater PCE concentrations were reported. PCE that was



previously identified in the subsurface at the Site is potentially due to the release of drycleaning solvents that occurred at this property.

- Chevron Station #93673 and R & T Oil, Inc. at 5305 Arlington Avenue are listed on the DELISTED TNK, LUST, HHSS, UST, CERS TANK, HIST TANK, UST SWEEPS, LOP RIVERSIDE, and UST RIVERSIDE databases. Listings identify four removed and three active gasoline USTs at this facility. On October 23, 1986, a petroleum hydrocarbon leak was discovered and reported during UST removal. Six groundwater monitoring wells were installed and between 4.9 and 19.7 inches of free product were measured. A vapor extraction system was installed in 1995 and operated until July 26, 1996 reportedly extracting 15,719 pounds of hydrocarbon vapors. Subsequent groundwater monitoring confirmed much of the source had been removed during remedial activities and no free product was observed. The UST case was closed and a “No Further Action” letter issued by the SA-RWQCB on May 14, 2002. Based on reviewed regulatory closure and the cross- or down-gradient location, this property is not considered to be a significant environmental concern to the Site.

**Other Properties** – There are three listings on the State, Tribal and local standard ASTM regulatory databases pertaining to multiple properties in the surrounding area that are identified on the CONTAINER RECY (one listing), LUST (one listing), and UST SWEEPS (one listing) databases. These properties are not considered to be significant environmental concerns to the Site.

## 5.2 Non-ASTM Regulatory Database Search

A myriad of non-ASTM regulatory databases was searched by ERIS as noted in the regulatory database report.

**Site** – The Site is listed on the following non-ASTM databases: FINDS/FRS, HIST CHMIRS, HAZNET, HIST MANIFEST, and DELISTED HAZ databases.

- Sears & Roebuck Co. is listed on the FINDS/FRS, HAZNET, HIST MANIFEST, and DELISTED HAZ databases. Findings include storage, manifesting, and disposal of hazardous waste materials including alkaline solutions, aqueous solutions with organic residue, asbestos containing waste, paint sludge, hydrocarbon solvents, halogenated solvents, liquids with halogenated compounds, waste oil, latex, unspecified organic material and liquids, and other unspecified solvents and inorganic waste. Reviewed listings are consistent with ASTM database findings and previously identified historical information. There are no spills or violations indicative of potential releases noted.
- 5261 Arlington Avenue is listed on the HIST CHMIRS which identifies a propane release due to mechanical failure of a tank on a Winnebago R/V. This listing is not considered an environmental concern to the Site.

**Adjoining Properties** – Adjoining properties are listed on the following non-ASTM databases: HAZNET, CDL, FED DRYCLEANERS, DRYCLEANERS, EMISSIONS, CERS HAZ, HWG RIVERSIDE, and MED WST RIVERSIDE databases.

- William G. Byrne, D.D.S. at 5171 Arlington Avenue Suite 8 and Riverside West Dental Group at 6945 Streeter Avenue are listed on the MED WST RIVERSIDE database. Both facilities are



identified as small quantity generators of medical waste. There are no violations or releases noted. This property is not considered to be a significant environmental concern to the Site.

- An illegal drug lab was identified at 6975 Capistrano Street in the CDL database. This property is not considered to be a significant environmental concern to the Site.
- Crown Cleaners and Jones Dry Cleaners at 5190 and 5335 Arlington Avenue, respectively, are listed on one or more of the DRYCLEANERS, FED DRYCLEANERS, and EMISSIONS databases. Reviewed information is consistent with previously described ASTM database and historical documentation findings. PCE that was previously identified in the subsurface at the Site is potentially due to the release of drycleaning solvents that occurred at the 5190 Arlington Avenue property.
- Wing Stop, Smart & Final, and Del Taco at 5200, 5202, and 5290 Arlington Avenue, respectively, are listed on one or both the CERS HAZ and HWG RIVERSIDE databases. Findings pertaining to minor violations (e.g., site map, business plan, employee training, and reporting requirements) are identified. Listed violations are not indicative of chemical releases at these facilities. This property is not considered to be a significant environmental concern to the Site.
- R & T Oil, Inc. at 5305 Arlington Avenue is listed on the EMISSIONS and HWG RIVERSIDE databases. There are no violations or releases noted. This property is not considered to be a significant environmental concern to the Site.

**Other Properties** – There are ten listings on the non-ASTM regulatory databases pertaining to properties in the surrounding area that are identified on the FED DRYCLEANERS (one listing), MRDS (one listing), DRYCLEANERS (one listing), CERS HAZ (one listing), EMISSIONS (one listing), CDL (one listing), HWG RIVERSIDE (one listing), and MED WST RIVERSIDE (three listings) databases. These properties are not considered to be significant environmental concerns to the Site.

### 5.3 Regulatory Agency File Reviews

If a property being assessed under a Phase I ESA or any of the adjoining properties are identified on one or more of the above referenced standard environmental record sources, pertinent regulatory files and/or records associated with such listings should be reviewed to assist the environmental professional in evaluating if recognized environmental conditions existing at a given subject property in connection with any listings. However, if in the environmental professional's opinion, such a review is not warranted, file reviews need not be conducted if the environmental professional provides justification for not doing so.

Agency file reviews for the Site completed during this assessment are noted below. No file reviews for adjoining properties or properties in the surrounding area were deemed warranted with the exception of research completed on the State Water Resources Control Board Geotracker database regarding properties in the surrounding area of the Site. The agency inquiries were performed by way of on-line searches/queries of published databases, and/or direct inquiries with public records clerks at one or more agencies.



Regulatory Agency	Jurisdiction	Date of Inquiry or Request	Contact	Response or Information From Agency
United States EPA Envirofacts/ECHO/ TRIS	Federal	9/27/2021	Online <a href="https://enviro.epa.gov/">https://enviro.epa.gov/</a>  <a href="https://echo.epa.gov/facilities/facility-search">https://echo.epa.gov/facilities/facility-search</a>  <a href="https://www.epa.gov/toxics-release-inventory-tri-program">https://www.epa.gov/toxics-release-inventory-tri-program</a>	Records Identified
California Department of Toxic Substances Control	State	9/27/2021	<a href="https://www.envirostor.dtsc.ca.gov/public">https://www.envirostor.dtsc.ca.gov/public</a>  <a href="https://hwts.dtsc.ca.gov/">https://hwts.dtsc.ca.gov/</a>	No Records Identified
State Water Resources Control Board/Regional Water Quality Control Board	State	9/27/2021	<a href="https://geotracker.waterboards.ca.gov/">https://geotracker.waterboards.ca.gov/</a>  <a href="https://geotracker.waterboards.ca.gov/historical_ust_facilities">https://geotracker.waterboards.ca.gov/historical_ust_facilities</a>	Records Identified

As shown in the table above, records pertaining to the Site were provided by each of the agencies contacted. Records pertaining to adjoining properties and properties in the vicinity of the Site were provided by two of the agencies contacted. A records search with the Riverside County DEH was not deemed warranted due to the SA-RWQCB being the lead regulatory agency for the former release case at the Site. The records provided as discussed below.

**United States Environmental Protection Agency** – Sears #1298/6711 was identified in the RCRAInfo Facility Information and Enforcement and Compliance databases. No waste codes, process information, reports, or violations were identified for the Site. Information from these records is consistent with mapped regulatory database findings discussed in Sections 5.1 and 5.2. No records regarding previously unidentified violations, USTs, or specific hazardous substance use, storage, or releases were found.

**DTSC** – No records were identified in the DTSC ENVIROSTOR or Hazardous Waste Tracking System databases.

**State Water Resources Control Board** – Sears Retail is listed as a closed case with no further action as of June 25, 2003. This closure is related to the previously identified petroleum hydrocarbon UST leakage from 1985. A June 25, 2003 “No Further Action” letter issued by SA-RWQCB for the Site was available on the GeoTracker database. Information from these records is consistent with mapped regulatory database findings discussed in Sections 5.1 and 5.2. No records were found regarding previously unidentified violations, USTs, or specific hazardous substance use, storage, or releases. A copy of the SD-RWQCB issued “No Further Action” letter is included in Appendix B.

The Site-adjointing Chevron #3673 and Crown Cleaners are listed as closed cases with no further action as of May 14, 2002 and October 7, 2003, respectively. These closures are related to the previously discussed petroleum hydrocarbon and PCE leak cases. “No Further Action” letters issued by SA-RWQCB for the Sites are available on the GeoTracker database. Information from these records is consistent with mapped regulatory database findings discussed in Section 5.2. No records were found



regarding previously unidentified violations, USTs, or specific hazardous substance use, storage, or releases.



## 6.0 HISTORICAL RESOURCE REVIEW

The objective of consulting historical sources is to develop a history of the previous uses of a property and surrounding area, in order to help identify the likelihood of past uses having led to recognized environmental conditions in connection with a given property. The goal of the historical research is to identify all obvious uses of a subject property from the present, back to the property’s first developed use, or back to 1940, whichever is earlier. The environmental professional exercises professional judgment in reviewing only as many of the standard historical sources referenced in ASTM E1527 that are deemed necessary, are reasonably ascertainable and are likely to be useful. Historical resources reviewed during the completion of this assessment are referenced below. Copies of the historical resources were obtained from the 2014 Phase I ESA prepared by Terracon and are included in Appendix C.

### 6.1 Aerial Photographs

We reviewed historical aerial photographs from the years 1938, 1948, 1953, 1966, 1977, 1985, 1990, 1994, 2005, 2006, 2009, 2010, and 2012 obtained by Environmental Data Resources, Inc. (EDR). The table below presents the results of the photograph review.

Photograph Year	Site Observations	Adjoining Property Observations
1938	The Site appears to be part of a larger agricultural use area. Several small structures are visible in the southern portion of the Site. Arlington Avenue and Streeter Avenue are present to the south and west of the Site, respectively.	Adjoining properties appear to be part of a larger agricultural use area. Several small structures are present to the north, south, and west of the Site. The eastern adjoining property appears to be an open field.
1948	The Site configuration appears consistent with the previous year except that there is an additional small structure on the northwest corner of the Site.	Adjoining properties to the north, west, and south appear consistent with the previous year. Significant residential development consistent with current configurations appear on the eastern adjoining property.
1953	The Site configuration appears consistent with the previous years except that there are additional small structures on the western and southern portions of the Site.	Significant residential development has taken place to the west and north of the Site, replacing former agricultural areas. Two large commercial structures and a parking lot are depicted on the southern adjoining property. Adjoining property configurations to the east appear consistent with the previous year.
1966 to 1977	The large retail and automotive center structures and parking areas are depicted on-Site. The former fueling island is depicted on the western portion of the Site.	Additional commercial and residential development has taken place at the southern and northern adjoining properties, respectively. Adjoining properties to the east and west are fully developed and appear generally consistent with current configurations.
1985 to 1990	The Site configuration appears consistent with aerial photographs dating back to 1966.	Additional commercial development has taken place at the southern adjoining properties including the Bank of America building immediately southwest of the Site. Adjoining properties to the north, east, and appear generally consistent with previous years.



Photograph Year	Site Observations	Adjoining Property Observations
1994	The Site configuration appears consistent with aerial photographs dating back to 1966.	The adjoining properties appear generally consistent with current configurations.
2005 to 2012	The small fueling island structure is no longer present on the western portion of the Site. The Site appears consistent with the current configuration.	The adjoining properties appear generally consistent with current configurations.

As stated above, the Site has been previously used for agricultural purposes. During historical agricultural activities throughout the State of California, various pesticides and more specifically organochlorine pesticides (OCPs) were commonly applied during the normal course of agricultural operations. Such compounds have since been banned from production and use in the United States. Based on the regulatory and historical research completed during the preparation of this assessment, no information has been revealed that would lead us to believe that an accidental spill or release of pesticide products has occurred at the Site. As such, the potential presence of residual agricultural chemicals in Site soils is not considered to be a recognized environmental condition in connection with the Site. Regardless, during future soil sampling analysis to be completed at the Site, shallow soils can be screening for the potential present of residual agricultural chemicals.

## 6.2 Topographic Maps

Our firm reviewed topographic maps from the years 1901, 1942, 1947, 1953, 1967, 1973, and 1980 obtained by EDR.

- Beginning in 1901 until 1947, several small structures are depicted on the southern portion of the Site. Roads appear along the southern and western portions of the Site. Small structures are depicted on the adjoining properties in all directions and generally increase in density over time.
- In 1953, an increased number of small structures are depicted on the western and southern portions of the Site. Significant residential development is depicted on the western and eastern adjoining properties. Two larger structures are visible on the southern adjoining property.
- Beginning in 1967, the large retail and automotive center structures are depicted on-Site. The former fueling island is depicted on the western portion of the Site. Adjoining properties appear generally consistent with current configurations.

## 6.3 City Directories

Our firm reviewed a city directory abstract prepared by Terracon in the client-provided Terracon 2014 Phase I ESA. The abstract was prepared using city directories available through EDR dated 1921 to 2013 and were reviewed at approximate five-year intervals, if readily available. Listings for the Site begin in 1966 when Allstate Insurance Co and Sears Roebuck & Co are identified. Sears retail operation is identified throughout the reviewed directories. Other identified Site listings include Rosenbaum S A optometrist (1977-1981), Sears Driving School (1977-1996), H&R Block (1986-2001), Katz Neil OD (1986-1996), Sears Dry Cleaners (1986), Miracle Ear Center (2002-2013), Cole Vision Corp (2008), Dr. Pham Tahoo OD (2008-2013), Gary Group (2008), and Univance Telecommunications (2008). The city directories are generally consistent with previously identified Site knowledge.



Adjoining and nearby properties in the surrounding area are primarily referenced in the directories as individual residences and/or as being used for general commercial and retail purposes. Findings were consistent with previously identified knowledge.

#### **6.4 Fire Insurance Maps**

No fire insurance maps were found showing the Site or nearby properties.

#### **6.5 Other Historical Sources**

Other historical sources are referenced in the ASTM E1527 practice as any source or sources other than the standard historical sources referenced in the practice that are credible to a reasonable person and that identify past uses of a subject property. This category includes, but is not limited to miscellaneous maps and directories, newspaper archives, internet sites, community organizations, local libraries, historical societies, current owners or occupants of neighboring properties, or records in the files and/or personal knowledge of the property owner and/or occupants. No historical sources other than the standard sources described above were deemed necessary and useful to assist in identifying recognized environmental conditions.



## **7.0 SITE RECONNAISSANCE**

The objective of the Site reconnaissance is to obtain information indicating the likelihood of identifying recognized environmental conditions in connection with a subject property. The Site visit for our assessment was completed on September 22, 2021, by James Wright who was unaccompanied during the reconnaissance.

### **7.1 Methodology and Limiting Conditions**

The Site reconnaissance consisted of observing the exterior grounds of the Site on foot, the accessible portions of the retail department store building interior, and walking publicly accessible areas surrounding the Site. Keys and/or property management with access to the automotive service center building and limited portions of the retail building basement level were not available during the site visit. Specific limitations are noted in Section 7.4. However, this is not considered a data gap as in-place features were reviewed and documented during a 2014 Phase I ESA. Select photographs of the Site obtained during the Site reconnaissance are included in Appendix D.

### **7.2 Current General Site and Vicinity Characteristics**

The Site and the surrounding vicinity are situated in the City of Riverside that consists primarily of commercial and residential properties and public roadways. The Site is currently developed with a single-story department store structure with basement level occupying the central portion of the property and an single-story automotive center with basement level in the western portion of the property. The department store structure is vacant except for the southeastern portion of the ground level which is temporarily occupied by Spirit Halloween. The automotive service structure is vacant. The two on-Site structures were formerly occupied by a Sears department store and Sears Auto Center. It is our understanding that the Site is planned for future redevelopment which will include demolition and conventional grading (i.e., removal and recompaction of soil) and a change in land use to residential.

### **7.3 Indications of Past Site and Vicinity Uses**

Evidence of historical Site use and operations are consistent with known and previously discussed information. No previously unidentified indications of past use of the Site or adjoining properties suggestive of environmental concerns were observed during Site reconnaissance.

### **7.4 Site-Specific Observations**

We examined visible and accessible areas of the Site for the features and conditions noted in the table below.



Feature or Condition	Details
General Description of Structures	<p>The primary retail building at the Site is an approximately 170,000-square foot structure with a basement level. The building was formerly occupied by Sears. Currently the southeastern portion of the ground level is occupied by Spirit Halloween and the remainder of the building is vacant. A vacant automotive service center formerly occupied by Sears is present in the western portion of the Site. The auto center is reportedly 28,000-square feet with a basement level. The auto center building and portions of the retail building were not accessible during site reconnaissance. The two structures are surrounded by an asphalt-paved parking area with minor landscaping.</p> <p>There are two commercial buildings located on the Site. The central building is an approximate 170,000-square foot vacant department store structure. The interior of the vacant department store building includes retail areas, warehouse and supply storage areas, sub-grade basement areas, public and freight hydraulic elevators, and restrooms. The basement area contains a disconnected boiler, trash compactor, and emergency generator. A smaller, approximately 28,000-square foot automotive service structure is located on the western portion of the property. This building includes six bay doors opening to a concrete-paved former service area with secondary containment structures, nine hydraulic hoists, and a sub-grade oil/water separator. The construction date of the two structure is likely the early- to mid-1960s based on review of historical documentation. The Site formerly contained a vehicle fueling island with three 10,000-gallon gasoline USTs which were removed in 1985 and seven 1,000 to 2,000-gallon oil and waste oil USTs removed in 1987; the fueling station island and distribution lines were removed in 1994. The balance of the remaining Site property comprises asphalt-paved parking areas, driveways, and minor landscaping. Access to the Site is provided from Arlington Avenue and Streeter Avenue along the southern and western sides of the property, respectively. Indicators of various utility systems are present throughout the Site, primarily adjoining the building exteriors and along the Site perimeter.</p>
Drains and Sumps	Interior floor drains are present in the bathrooms and former maintenance areas of the retail building. Reportedly, two sumps are present in the retail building basement; however, these areas were not accessible during site reconnaissance. Exterior stormwater drains are present throughout the parking area.
Heating/Cooling Systems	A chiller and disconnected boiler are present in the retail building basement level.
Potable Water Supply	Riverside Public Utilities.
Roads	Arlington Avenue and Streeter Avenue border the southern and western sides of the Site, respectively.
Septic Systems / Sewage Disposal System	Riverside Public Utilities.
Wastewater and Stormwater Discharges	None observed. Stormwater appears to flow as surface runoff to storm drains located throughout the parking area. Stormwater drains appear to discharge to the municipal stormwater system.
Wells	None observed.



Feature or Condition	Details
Drums	None observed.
Electrical or Hydraulic Equipment Known to Contain PCBs or Likely to Contain PCBs	Two public and two freight hydraulic elevators were observed in the retail building. With the exception of the central freight elevator, maintenance rooms were inaccessible during site reconnaissance. No staining was observed in the accessible elevator maintenance room. Reportedly, one elevator and nine hydraulic hoists are present in the vacant automotive service center building. The auto center building was inaccessible during site reconnaissance.
Hazardous Substances and Petroleum Products in Connection with Identified Uses	Reportedly, the retail building contains a natural gas-fueled emergency generator and air compressor in the basement level, and the auto center building contains three air compressors, a subsurface oil/water separator, and former hazardous materials storage areas. Due to accessibility issues, these areas and features were not observed during site reconnaissance and their continued presence and/or condition are unknown.
Hazardous Substance and Petroleum Products Not Necessarily in Connection With Identified Uses	None observed.
Odors	None noted.
Pits, Ponds or Lagoons	None observed.
Pools of Liquid	None observed.
Solid Waste (Including Fill Material)	A loading dock and solid waste receptacle are present at the northern portion of the retail building. A trash compactor is present in the retail building basement. Minor staining was observed of the concrete floor in the trash compactor area.
Stained Soil or Pavement	Minor asphalt staining consistent with typical automotive parking areas was observed.
Stains or Corrosion	As noted above, minor staining was observed of the concrete floor in the trash compactor area.
Chemical Storage Tanks	None observed.
Stressed Vegetation	None observed.
Unidentified Substance Containers	None observed.



## **8.0 INTERVIEWS**

### **8.1 Site Owner**

A representative of the Site owner was interviewed during the preparation of this assessment. The Site owner is aware of the former leaking UST case for the Site and the requirement from the SA-RWQCB to complete additional assessment in conjunction with the future change in land use.

### **8.2 Key Site Manager**

The Site owner representative is also the Key Site Manager. Please refer to Section 8.1 above.

### **8.3 Current Occupants**

The southeastern portion of the ground level of the retail building is temporarily occupied by Spirit Halloween a seasonal retail operation selling Halloween costumes and decoration. The remainder of the retail building and the automotive center building are unoccupied. The temporary Site occupant was not interviewed during the completion of this assessment. This is not considered to be a data gap of significance.

### **8.4 Local Government Official**

Local government officials were not contacted during the preparation of this assessment. This is not considered to be a data gap of significance as it is well known that additional assessment at the Site will be required by the SA-RWQCB in conjunction with the future change in land use.

### **8.5 Other Parties**

Interviews with other persons were not conducted during the preparation of this assessment. As stated in the ASTM E1527 practice, interviews with past owners, operators, and occupants of a subject property who are likely to have material information regarding the potential for contamination at a given property shall be conducted to the extent that they have been identified and that the information likely to be obtained is not duplicative of information already obtained from other sources. Interviews with persons with past association with the Site were not deemed warranted during the completion of this assessment.



## **9.0 ADDITIONAL SERVICES – NON-SCOPE ASTM CONSIDERATIONS**

No additional services as defined by ASTM were completed by our firm during the preparation of this assessment. Several non-scope ASTM considerations are referenced in the ASTM E1527 practice that a user of a report may wish to evaluate. Listed considerations in the practice include asbestos-containing building materials, biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, indoor air quality (unrelated to releases of hazardous substances or petroleum products into the environment), industrial hygiene, lead-based paint, lead in drinking water, mold, radon, regulatory compliance and wetlands. No implication is intended by the practice as to the relative importance of inquiry into such non-scope considerations, and the list of considerations is not intended to be all-inclusive. An evaluation of one or more of the non-scope considerations was not requested of our firm as part of the scope of services for the assessment. Therefore, no findings, opinions and conclusions of this assessment are based on said non-scope ASTM considerations.



## 10.0 FINDINGS AND OPINIONS

No features and/or conditions indicating the presence or likely presence of hazardous substances and/or petroleum products at the Site that are considered to have the potential to adversely impact the Site were identified during the completion of this assessment, with the exception of the following:

- The former presence of USTs at the Site and the release of petroleum hydrocarbons that occurred at the Site.

The former USTs and release is considered to be a historical recognized environmental condition in connection with the Site. As stated previously, the SA-RWQCB issued a “No Further Action” letter for the Site based on the existing land use at the time (commercial). Because the Site will change land use to residential, additional assessment will be required under SA-RWQCB oversight.



## 11.0 CONCLUSIONS AND RECOMMENDATIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM International Practice E1527 of the Site located at 5261 Arlington Avenue in the City of Riverside, Riverside County, California. Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report. This assessment has revealed no evidence of current or controlled recognized environmental conditions in connection with the Site. The former presence of USTs at the Site and the release of petroleum hydrocarbons that occurred at the Site is considered to be a historical recognized environmental condition. Future additional assessment at the Site will be conducted under the oversight of the SA-RWQCB.



## 12.0 ENVIRONMENTAL PROFESSIONAL STATEMENT

I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in Section 312.10 of 40 CFR. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Qualifications of personnel involved with the completion of this report are included in Appendix E.



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Daniel Weis, R.E.H.S.  
Environmental Manager



## 13.0 ASSUMPTIONS

No Phase I ESA effort can eliminate uncertainty regarding the potential for recognized environmental conditions to exist in connection with a given property. Performance of the ASTM E1527 practice may reduce such uncertainty but in no way should the findings and report be misconstrued as insurance or a guarantee regarding the potential for recognized environmental conditions in connection with a given property. The ASTM E1527 practice recognizes reasonable limits of time and cost relative to the completion of a Phase I ESA.

During the completion of this ESA, our firm relied on certain information obtained from secondary sources, including but not limited to the user of the report, government agencies, historical research business entities, environmental databases, and interviews with one or more persons. The sources obtained and/or consulted are assumed to be reliable. However, our firm cannot warranty or guarantee that the information provided by these other sources is wholly accurate or complete. Our firm is not responsible for any misrepresentations or false statements that may be provided by others or the lack of pertinent/relevant information that should have been provided/disclosed by others and we assume no responsibility for any consequence as a result of such omissions or withheld information.

Accuracy and completeness of records varies among information sources, including from governmental agencies. As a result, there is a possibility that even with the proper application of the methodologies presented in ASTM E1527, conditions may exist that could not be identified within the scope of this assessment or which were not reasonably identifiable from the available information. In addition, any responses received from Federal, State, Tribal, and local regulatory agency secondary sources of information after the issuance of this report may change certain findings and conclusions of this report.

Estimations and opinions regarding the potential for off-Site properties to adversely impact a given subject property is one of the key components of a Phase I ESA. In most cases, recent property-specific or adjacent-property specific measured groundwater data or other hydrogeological information is not reasonably ascertainable. In the absence of such data, reasonable assumptions regarding the depth and flow of groundwater are made based on various sources including comparisons to surface elevations, land topography and available hydrogeological on the State of California Geotracker database. In addition, estimations and opinions regarding potential impacts from off-Site locations may be based on certain assumptions that a hazardous substance or petroleum product may not migrate laterally within unsaturated soil for a substantial distance and that contaminants that have reached saturated soil and groundwater may attenuate over time and/or may decrease in concentration relative to distance from its source. While any interpretations presented herein may be effective in reducing uncertainty regarding potential impacts to a subject property from off-Site locations, in no way should the findings and report be misconstrued as insurance or a guarantee regarding the potential for such impacts to occur. Greater certainty regarding subsurface conditions at a given property can only be achieved by way of a subsurface sampling effort of one or more media.



## 14.0 DEFINITIONS

Definitions of key terminology relevant to the ASTM E1527 practice are presented below.

**Recognized Environmental Condition** - The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

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

**Data Failure** - A failure to achieve the historical research objectives as outlined in the ASTM E1527 practice even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Data failure is one type of data gap.

**Data Gap** - A lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by the ASTM E1527 practice, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.). Data gaps are only considered to be significant if they affect the ability of the environmental professional to identify recognized environmental conditions.

**De Minimis Condition** - A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.

**Environment** - (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act [16 U.S.C. §§ 1801 et seq.], and (B) any other surface water, groundwater, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.

**Good Faith** - The absence of any intention to seek an unfair advantage or to defraud another party; an honest and sincere intention to fulfill one's obligations in the conduct or transaction concerned.

**Hazardous Substance** - Includes hazardous substances designated under section 311 of the Clean Water Act (CWA) or Section 102 of CERCLA, any toxic pollutant listed under Section 307(a) of the CWA, any waste that has been listed as a RCRA hazardous waste or possesses a RCRA hazardous waste characteristic, any substance that is identified as a hazardous pollutant under Section 112 of the Clean Air Act (CAA), and any imminently hazardous chemical that EPA has taken action pursuant to Section 7 of the Toxic Substances Control Act (TSCA).

**Historical Recognized Environmental Condition** - A past release of any hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority or



meeting unrestricted use criteria established by a regulatory authority, without subjecting the property in question to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

**Petroleum Exclusion** – While the definition of a CERCLA hazardous substance specifically excludes petroleum products and crude oil, the EPA has determined that the petroleum exclusion applies to petroleum products such as gasoline and other fuels containing lead, benzene or other hazardous substances that are normally added during the refining process. Notwithstanding the existence of the petroleum exclusion, petroleum products are included within the scope of the ASTM E1527 practice for multiple reasons. Petroleum products have historically been widely used at commercial properties. In addition, other federal and state laws may impose liability for releases or spills of petroleum products.

**Reasonably Ascertainable Information** - Information that is (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints and (3) practically reviewable.

**Release or Threatened Release** - Spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment (including the abandonment or discarding of barrels, containers and other closed receptacles containing any hazardous substance, or pollutant or contaminant).



## 15.0 REFERENCES

Sources of information consulted during the completion of our Phase I ESA are noted in the sections below.

### 15.1 Documents, Plans and Reports

- All Appropriate Inquiry” as necessary to satisfy the defenses available under 42 U.S.C. §§ 9607(b)(3), 9607(r)(1), and 9607(q), relying on definitions provided at 42 U.S.C. §§ 9601(35)(B); and as further explained in 40 CFR §§ 312.1 – 312.31.
- ASTM International, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," ASTM Designation E 1527-13, Published November 2013.
- California Geological Survey, 2002, California Geomorphic Provinces Note 36, Electronic Copy, Revised December.
- California State Water Resources Control Board, Water Quality Control Plan for the Santa Ana River Basin (8), California, Published 2019.
- ERIS Database Report dated September 8, 2021.
- State Water Resources Control Board (SWRCB), GeoTracker, accessed September 17, 2021.
- USGS topographic map, Tustin, California Quadrangle (2016).
- Stantec. 2018. Phase I Environmental Site Assessment, Warner Red Hill, 2300, 2310, and 2320 Red Hill Avenue, Santa Ana, California. Prepared for: RHW Holdings, LLC c/o CT Realty. July 2, 2018.
- Stantec. 2018. Phase II Environmental Site Assessment, Former Ricoh Electronics, Inc. Facility, 2300, 2310, and 2320 Red Hill Avenue, Santa Ana, California. Prepared for: RHW Holdings, LLC c/o CT Realty. July 24, 2018.

### 15.2 Personal Communications

- Designated Site Owner Representative – Mr. Chris Campbell
- Key Site Manager – Mr. Chris Campbell

### 15.3 Agencies Consulted

- California Department of Conservation, Geologic Energy Management Division (CalGEM)
- California Department of Toxic Substances Control
- California State Water Resources Control Board
- United States EPA



## FIGURES

**FIGURE 1**  
VICINITY MAP

**FIGURE 2**  
**SITE PLAN**

**FIGURE 3**  
TOPOGRAPHIC MAP

## **APPENDICES**

**APPENDIX A**  
REGULATORY DATABASE REPORT

**APPENDIX B**  
NO FURTHER ACTION LETTER

**APPENDIX C**  
HISTORICAL RESOURCES

**APPENDIX D**  
**PHOTOGRAPHS**

**APPENDIX E**  
**QUALIFICATIONS**