



**PHASE I ENVIRONMENTAL  
SITE ASSESSMENT  
COSTCO WAREHOUSE NO. 122  
PROPOSED WAREHOUSE LOCATION  
2505 AND 2541 EL CAMINO REAL  
TUSTIN, CALIFORNIA**

**November 29, 2018**

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A Report Prepared for:

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COSTCO WAREHOUSE NO. 122  
PROPOSED WAREHOUSE LOCATION  
2505 AND 2541 EL CAMINO REAL  
TUSTIN, CALIFORNIA**

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This report documents a Phase I Environmental Site Assessment (ESA) performed by Kleinfelder for Costco Wholesale Corporation (Costco / Client), of a new location for Costco Warehouse No. 122, which is presently located at 2655 El Camino Real in the City of Tustin, Orange County, California. The proposed new warehouse location will be situated on two parcels of land identified by the Orange County Assessor as Assessor's Parcel Numbers (APNs) 500-185-05 and 500-185-06 (collectively, the Site), located west of the existing Costco facility (see Figure 1). Kleinfelder understands the Client is considering acquiring APN 500-185-05 and leasing APN 500-18-06 for purposes of developing the Site with a new Costco warehouse. In addition, Costco intends to redevelop its existing property (APN 500-185-04) by constructing a new car wash and fuel facility. However, since Costco currently owns APN 500-185-04, that parcel is not included as part of this Phase I ESA.

This report was prepared using the ASTM International Designation E 1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (the "Standard Practice"), the All Appropriate Inquiry (AAI) section of the Small Business Liability Relief and Revitalization Act (the Federal Brownfields Law), and Costco's Development Requirements, Version 2014, revised June 13, 2014. The Phase I ESA findings include the following:

- The Site is located on the eastern corner of the intersection of Tustin Ranch Road and El Camino Real in the City of Tustin, Orange County, California (see Figure 1). It consists of the following two parcels of land (see Figure 2):
  - APN 500-185-05 comprises approximately 1.0 acre of land and is assigned a street address of 2541 El Camino Real. This parcel is occupied by a Goodyear Tire and Auto Center (Goodyear) facility (referred to as Tustin Ranch Tire and Auto Center) and associated parking and landscaping.
  - APN 500-185-06 comprises approximately 9.1 acres of land and is associated with the address of 2505 El Camino Real. This parcel is occupied by a vacant former international supermarket.
- The Site was historically used for agricultural purposes between at least 1938 and 1985. The existing Site building on APN 500-185-06 was constructed in 1993 and was occupied by retail stores, including K-Mart and Sears, until at least 2005. This building was remodeled in 2011 and was occupied by various facilities, including Aria International

Market, Ansar Gallery, Heidar Baba International Restaurant, and Bubbly's café, which were associated with an international supermarket. The building is currently vacant. The existing service building on APN 500-185-05 was constructed as an automobile service center in late-1997 and it has been occupied by a Goodyear facility, operating previously under the name Anaheim Hills Tire Inc., and currently under the name Tustin Ranch Tire and Auto Center.

- Tustin Ranch Tire and Auto Center is listed in the Environmental Data Resources, Inc. (EDR) database report as a small quantity generator (SQG) of hazardous waste in 1997. It is also listed as a permitted aboveground storage tank (AST) facility through the County of Orange. No unauthorized releases or violations were reported for this Site facility.
- The Goodyear facility currently maintains hazardous materials and petroleum products, and generates hazardous waste typical of automobile-related facilities. The facility maintains two 500-gallon ASTs and one 300-gallon AST containing motor oil, and a 500-gallon AST containing used oil. Various 55-gallon drums containing oil, antifreeze, transmission fluid, used auto parts and batteries were observed throughout the Goodyear facility. Thirteen active and two abandoned in-ground hydraulic hoists, and two aboveground hydraulic hoists were observed. A three-stage clarifier is located in a yard in the middle of the Goodyear facility. A parts cleaning station was observed, but reportedly uses hot water and soap for cleaning. Small quantities of other chemicals used in automobile-related services (e.g., spray cans of brake cleaner, solvents, etc.) are present throughout the facility.
- Evidence of leakage and/or staining observed at the Goodyear facility included: leakage from several used car batteries on apparent corroded concrete; leakage from a car under repair at the time of the Site reconnaissance visit; oil staining on the floor near the used oil AST; oil staining on the floor beneath leaky floor jacks stored in the yard area; oil staining near a bolt of one in-ground hoist; and, an area of oil staining near a curb south of the Goodyear facility. In addition, two asphalt patched areas with patched trenching, reported to be associated with sewer repairs, were noted west of the Goodyear facility; and, an unknown patch was observed south of the Goodyear facility yard.
- Various dry-cleaning facilities were listed in the EDR database report as having occupied a tenant space in a building that adjoins the Site to the northeast at 2530 Bryan Avenue from at least 2000 through 2014. At least one of the dry-cleaning facilities used tetrachloroethylene (PCE) and trichloroethylene (TCE) in the dry-cleaning process.

Currently, Chase Cleaners occupies this tenant space. No unauthorized releases were reported to have occurred at this facility location. However, the potential exists for undocumented releases to have occurred at this facility location. No other off-Site facilities were identified as potential concerns to the Site.

This assessment has revealed no evidence of controlled recognized environmental conditions (CRECs) in connection with the Site. The following recognized environmental conditions (RECs) were noted:

- The potential for undocumented releases from the adjoining former and current dry-cleaning facilities, located northeast of the Site, represents a REC.
- The potential for subsurface contamination from former automobile-related activities represents a REC.

Based on the findings and conclusions of this Phase I ESA, Kleinfelder has the following recommendations for further assessment.

- Because Costco plans to lease APN 500-185-06, and because the portion of the parcel nearest the former and current off-Site dry-cleaning facilities, located northeast of the Site, will remain a surface parking lot, Kleinfelder does not recommend subsurface sampling at this time. However, if Costco should develop this area of the property with structures in the future, sampling is recommended to assess potential impacts resulting from the former and current off-Site dry-cleaning facilities.
- Subsurface sampling should be performed at the Goodyear facility to assess areas of concern (e.g., near in-ground hoists, near clarifier, and in areas of observed leakage/staining). In addition, unidentified patches should be assessed using geophysical survey methods to assess for the presence of subsurface features (e.g., underground storage tanks, etc.).
- A pre-renovation and demolition hazardous materials building survey should be performed of the existing structures to assess for the presence of asbestos-containing materials (ACMs), lead-based paint (LBP), and other hazardous building materials such as fluorescent light ballasts.

Deviations, historical RECs (HRECs), and *de minimis* findings are discussed in Section 8 of this report. This report is subject to the limitations in Section 2.5.

This report is a summary of work performed using the guidelines set forth in the Standard Practice, the AAI section of the Federal Brownfields Law, and Costco's Development Requirements, Version 2014, revised June 13, 2014. This report also generally conforms to the Standard Practice's suggested table of contents. Minor format modifications have been made to the Standard Practice's suggested table of contents to assist in better reading and understanding the report findings.

## 2.1 PURPOSE

The purpose of this Phase I ESA is to identify, to the extent feasible pursuant to the scope of services defined in our Proposal No. MPCSTCO.001C/IRV18P80513, dated June 27, 2018, and limitations discussed in this report, RECs and other environmental issues related to the Site.

As defined in the Standard Practice, a REC is:

*"The presence or likely presence of any hazardous substances or petroleum products in, on or at a property: (1) due to a 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. De minimis conditions are not recognized environmental conditions."*

As defined in the Standard Practice, a *de minimis* condition is:

*"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."*

The 2013 Standard Practice also introduced the designation of CREC. As defined in the Standard Practice, a CREC is:

*"... a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the*

*implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."*

The 2013 Standard Practice defines an HREC as:

*"...a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to environmental controls."*

The final decision regarding whether a past release is an HREC rests with the environmental professional (EP), and will be influenced by the current impact (if any) of the past release to the Site.

This report describes Kleinfelder's assessment methodology and documents its findings, subject to the limitations presented in Section 2.5 of this report.

## 2.2 DETAILED SCOPE OF SERVICES

The following sections describe Kleinfelder's work scope:

- Section 2, **Introduction**, includes a discussion of the purpose/reason for performing the Phase I ESA, additional services requested by the Client (e.g., an evaluation of business environmental risk factors associated with the Site), significant assumptions (e.g., property boundaries if not marked in the field), limitations, exceptions, special terms and conditions (e.g., contractual), and user reliance parameters.
- Section 3, **Site Description**, is a compilation of information concerning the Site location, legal description (if provided by the Client), current and proposed use of the Site, a description of structures and improvements on the Site at the time of Kleinfelder's assessment, and adjoining property use.
- Section 4, **Records Review**, is a compilation of Kleinfelder's review of several databases available from Federal, State, and local regulatory agencies regarding hazardous substance use, storage, or disposal at the Site; and for off-Site facilities within the search distances specified by the Standard Practice. Records provided by the Client are summarized, and copies of relevant documents are included in the appendices of this report. Physical setting sources (including topography and soil and groundwater

conditions) and typical Client-provided information (e.g., title records, environmental liens, specialized knowledge, valuation reduction for environmental issues, and owner, property manager, and occupant information) are also summarized. Other interviews with people knowledgeable about the Site (including the Client) are included in Section 7.

- Section 5, **History of the Site**, summarizes the history of the Site and adjoining properties. This Site history is based on various sources, which may include a review of historical aerial photographs, Sanborn Fire Insurance Maps, city or suburban directories, historical topographic maps, building department records, and results of previous Site assessments (if any and reasonably ascertainable).
- Section 6, **Site Reconnaissance**, describes Kleinfelder's observations during the Site reconnaissance. The methodology used and limiting conditions are also described.
- Section 7, **Interviews**, is a summary of telephone and personal interviews performed with "Key Site Managers" that may include the Site owner/manager, occupants/tenants, local government officials, and the Client. Additional interview sources may be contacted if Key Site Managers were not available prior to production of this report, and may include adjoining landowners and people with historical knowledge of the area.
- Section 8, **Evaluation**, is a presentation of findings and opinions regarding the information provided in Sections 3 through 7, and presents the conclusions regarding the presence of RECs connected with the Site, and Kleinfelder's recommendations.
- Section 9, **References**, is a summary listing of the resources used to compile this report.

A statement of qualifications of the signatories of this report is provided in Appendix A, and pertinent documentation regarding the Site is included in Appendices B through D.

### 2.3 ADDITIONAL SERVICES

Kleinfelder's scope of services as part of this Phase I ESA did not include Standard Practice non-scope evaluations of cultural, historic, and archaeological resources; environmental regulatory compliance; wetlands and surface water; and threatened, endangered, and other protected species that may be required for a Phase I ESA pursuant to Costco's Development Requirements publication (revised June 13, 2014). In addition, the Phase I ESA did not include an assessment for asbestos, lead-based paint, radon, lead in drinking water, molds and mildews, indoor air quality, industrial hygiene, health and safety, and other Standard Practice non-scope considerations not described herein.

## 2.4 SIGNIFICANT ASSUMPTIONS

Kleinfelder does not guarantee the accuracy of information supplied by its sources but reserves the right to rely on the information in forming a professional opinion regarding the potential for contamination at the Site. It is assumed the Client provided Kleinfelder all applicable and available environmental records and specialized knowledge in its possession regarding the Site. Kleinfelder has not made other significant assumptions during the performance of this Phase I ESA.

## 2.5 LIMITATIONS AND EXCEPTIONS

Phase I ESAs are non-comprehensive by nature and may not identify all environmental problems and will not eliminate all risk. This report is a qualitative assessment. Kleinfelder offers a range of investigative and engineering services to suit the needs of its clients, including more quantitative investigations. Although risk can never be eliminated, more detailed and extensive investigations yield more information, which may help the Client understand and better manage risks. Since such detailed services involve greater expense, Kleinfelder asks its clients to participate in identifying the level of service that will provide them with an acceptable level of risk. Please contact the signatories of this report if you would like to discuss this issue of risk further.

Kleinfelder performed this Phase I ESA consistent with the guidelines set forth in the Standard Practice; Costco's Development Requirements, Version 2014 (revised June 13, 2014); and the proposed scope of services subsequently approved by Costco. No other warranty, either express or implied, is made. Environmental issues not specifically addressed in this report were beyond the scope of Kleinfelder's services and not included in the evaluation.

This report may be used only by Costco and only for the purposes stated within a reasonable time from its issuance, but in no event later than one year from the date of the report. Land or facility use, on- and off-Site conditions, regulations, or other factors may change over time, and additional work may be required with the passage of time. Since Site activities and regulations beyond Kleinfelder's control may change at any time after the completion of this report, the observations, findings, and opinions provided herein are considered valid only as of the date of the Site visit. Pursuant to Section 4.6 of the Standard Practice, this report should not be relied upon after 180 days from the date of its oldest component. Any party other than the Client who wishes to use this report shall notify Kleinfelder of such intended use. Based on the intended use of the report, Kleinfelder may require that additional work be performed and that an updated report be issued. Non-compliance with any of these requirements by the Client or anyone else will release

Kleinfelder from any liability resulting from the use of this report by any unauthorized party, but only to the extent of any such non-compliance by the Client.

The Phase I ESA has been conducted in accordance with, and conforms to the Costco Wholesale Development Requirements Document and the latest edition of ASTM E 1527. This assessment has been prepared for the sole use of Costco Wholesale Corporation. Its contents should not be relied upon by other parties without the express written consent of Costco Wholesale Corporation.

## 2.6 SPECIAL TERMS AND CONDITIONS

No special terms and conditions were agreed to by the Client and Kleinfelder.

The Site description is presented in this section and describes the condition of the Site at the time of the Phase I ESA. The Site location is shown on Figure 1. Tables 3-1 through 3-4 summarize the physical characteristics of the Site and adjoining properties.

3.1 LOCATION AND LEGAL DESCRIPTION

The information presented in Table 3-1 denotes the physical location and legal description of the Site. This information was obtained from review of various maps (such as topographic maps and tax assessor maps), aerial photographs, public records at City and/or County offices, interviews, and/or information provided by the Client.

**TABLE 3-1**  
**Location and Legal Description**

PARAMETER	INFORMATION/COMMENTS
LOCATION	The Site is located on the eastern corner of the intersection of Tustin Ranch Road and El Camino Real in the City of Tustin, Orange County, California (see Figure 1).
LEGAL DESCRIPTION	The legal description of the Site parcels is presented in the <i>EDR Environmental Lien and AUL Search</i> report (EDR, 2018a) provided in Appendix C.
ASSESSOR'S PARCEL NUMBER	The Site is situated on two parcels of land identified by the Orange County Assessor as APNs 500-185-05 and 500-185-06.
ADDRESS(ES)	APN 500-185-05 – 2541 El Camino Real, Tustin, California APN 500-185-06 – 2505 El Camino Real, Tustin, California
SECTION, TOWNSHIP, AND RANGE	Township 5 South, Range 9 West, Sections 22 and 23 of the San Bernardino Base and Meridian.
ZONING	Based on the Zoning Map of the City of Tustin, dated June 2018, reviewed on the City of Tustin website ( <a href="http://www.tustinca.org/depts/cd/maps.asp">http://www.tustinca.org/depts/cd/maps.asp</a> ), the Site is zoned "PC COM", which indicates a Planned Community Commercial zone.

3.2 CURRENT / PROPOSED USE OF THE PROPERTY

Land use in the general vicinity appeared to be commercial and residential at the time of Kleinfelder's assessment. Current and proposed Site uses are described in Table 3-2.

**TABLE 3-2**  
**Current and Proposed Uses**

<b>PARAMETER</b>	<b>GENERAL OBSERVATIONS</b>
CURRENT USE	A former international supermarket building (currently vacant) at 2505 El Camino Real, a Goodyear facility at 2541 El Camino Real, and associated parking and landscaping.
PROPOSED USE	Redevelopment for relocation of Costco's existing Warehouse No. 122.

**3.3 DESCRIPTION OF STRUCTURES / IMPROVEMENTS**

Structures and/or improvements observed on the Site at the time of Kleinfelder's reconnaissance are described in Table 3-3.

**TABLE 3-3**  
**Structures and Improvements**

<b>PARAMETER</b>	<b>GENERAL OBSERVATIONS</b>
STRUCTURES	A former international supermarket building and a Goodyear building are present on the Site.
IMPROVEMENTS	Asphalt-paved parking lot, landscaping and utility infrastructure.

**3.4 CURRENT USES OF ADJOINING PROPERTIES**

Kleinfelder performed a brief drive-by survey of the properties immediately adjoining to the Site on July 13, 2018. A summary of the observations regarding the surrounding properties is presented in Table 3-4 and shown on Figure 2, Site Map.

**TABLE 3-4**  
**Adjoining Properties**

<b>DIRECTION</b>	<b>LAND USE DESCRIPTION</b>
NORTHEAST	Properties northeast of the Site include: McDonalds (2452 Bryan Avenue); a multi-tenant retail building (2530 Bryan Avenue) including Nails Luv, Salon Ritz, Chase Cleaners, an eye care facility, and dentist; and, a multi-tenant building (2560 Bryan Avenue) including Hoag Urgent Care, vacant tenant suites, and a Taekwondo facility. Bryan Avenue, the El Modena-Tustin Channel and residential properties are located beyond.
SOUTHEAST	The existing Costco Warehouse No. 122 and associated parking and landscaping adjoin the Site to the southeast.
SOUTHWEST	El Camino Real is located southwest of the Site, beyond which are automotive dealerships located at 1, 5 and 9 Auto Center Drive.
NORTHWEST	Tustin Ranch Road is located northwest of the Site, beyond which are residential properties.

Properties adjoining the Site are likely to use hazardous materials and/or petroleum products, and generate hazardous waste (e.g., Chase Cleaners northeast of the Site; automobile dealerships southwest of the Site). However, hazardous materials and petroleum products were not observed to be stored on the properties adjoining the Site. No other environmental conditions were apparent on the adjoining properties at the time of Kleinfelder's Site reconnaissance.

#### 4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

The purpose of the records review is to obtain and review records that would help to evaluate RECs in connection with the Site and bordering properties. Federal, State, and local regulatory agencies publish databases or “lists” of businesses and properties that handle hazardous materials or hazardous waste or are the known location of a release of hazardous substances to soil and/or groundwater. These databases are available for review and/or purchase at the regulatory agencies, or the information may be obtained through a commercial database service. Kleinfelder contracted a commercial database service, EDR, of Shelton, Connecticut, to perform the government database search for listings within the appropriate Standard Practice minimum search distance of the Site, and the distances set forth in Costco’s Development Requirements, Version 2014, revised June 13, 2014. Included in the EDR Radius Map™ Report with GeoCheck® (EDR, 2018b) is a listing of specific databases outlined by the Standard Practice. A listing of the search distances, databases evaluated, dates the databases were last updated, and types of information contained in each database are included in the regulatory database search report provided in Appendix B of this report.

EDR utilizes a geographical information system to plot the locations of reported spills, leaks, incidents, etc. Kleinfelder reviews this information to help establish if the Site or nearby properties are listed in the databases and lists. Each of the listings was reviewed by Kleinfelder to assess whether the corresponding property details included in EDR’s report revealed a potential environmental impact to the Site. Many listings in the report were concluded not to have the potential to impact the Site based on the following, or a combination thereof:

- The listed property is located at a distance where the facility is unlikely to impact the Site based on Kleinfelder’s evaluation of the relevant data in EDR’s report and knowledge of the Site vicinity.
- The listed property is located in a down-gradient or cross-gradient direction from the Site, based on the anticipated direction of groundwater flow (east-southeast) at the property being evaluated, and is located at a distance such that it is unlikely to impact the Site. Judgements as to down- or cross-gradient direction are best made if groundwater flow direction information is available for a specific property.

- The listed property is identified in the underground storage tank (UST) or SQG databases and does not immediately adjoin the Site. The property is furthermore not listed in other databases that report a release of a hazardous substance or petroleum product and/or is not listed as having environmental violations. The listing of a facility in these databases alone is not indicative of an unauthorized release.
- The listing for the facility suggested a short-term release occurred (e.g., from incidental traffic accidents or involving limited quantities of chemicals from illegal drug labs found at residences), with associated response actions completed.
- The quantity of the hazardous substances or petroleum product released from an off-Site, non-adjointing facility was not judged to have resulted in contamination above the most stringent criteria requiring regulatory action. Therefore, no impact to the Site is anticipated.
- The listed property record indicates that the property was characterized, the reported release affected soil only, the listed property was not on or adjacent to the Site, and the release was not recognized as indicative of area-wide conditions or was characterized as a soil removal action only.
- The listed property record indicates that contamination on the property is limited to relatively non-mobile contaminants, including polyaromatic hydrocarbons (PAHs) and metals, in soil only, on a non-adjacent property.
- The listed property record indicates that the case for the property has been closed to the satisfaction of the designated lead regulatory agency, and residual contamination, if present, is not considered likely to affect the Site based on one or more of the criteria mentioned in the bulleted items above (a condition referred to by the Standard Practice as an HREC).

Based on these criteria indicating no material threat of a release that affected the Site and/or no release that could require future regulatory agency oversight, the listings concluded not to have the potential to impact the Site were not evaluated further and are not discussed in the following sections.

## 4.2 RESULTS OF DATABASE SEARCH

The remaining property listings, if applicable, were reviewed to assess whether these properties had environmental releases that may have resulted in RECs in connection with the Site. Listed

properties for which a reported release may have resulted in a REC in connection with the Site were further assessed by performing a review of agency files available through the GeoTracker™ website (<https://geotracker.waterboards.ca.gov/>) operated by the State Water Resources Control Board (SWRCB), and/or review of other relevant regulatory agency websites, to evaluate whether the listed release represents a potential impact to the Site.

#### 4.2.1 Site Listings

*"Tustin Ranch Tire and Auto Ctr" (2541 El Camino Real)* – This facility is listed as a SQG of hazardous waste in 1997 with no reported violations. In addition, the facility is permitted through the County of Orange to maintain ASTs with a total capacity of 1,320 gallons. No releases were reported for this facility. The listing information alone does not suggest a REC for the Site.

#### 4.2.2 Off-Site Listings

Numerous facilities in the Site vicinity are listed in various databases searched by EDR. A summary of off-Site listings that were further reviewed as to the potential to impact the Site is presented in Table 4-1.



**Table 4-1  
Off-Site Facilities of Potential Concern**

FACILITY OR SITE NAME	FACILITY OR SITE ADDRESS	PROXIMITY TO SITE (FEET)	COMMENTS
"Costco Wholesale No. 122", "Costco Wholesale #122"	2655 El Camino Real	Adjoins northeast	Costco is listed in various databases searched by EDR. Of note, Costco was listed in the California Hazardous Materials Incident Reporting System (CHMIRS) and Emergency Response Notification System (ERNS) databases for having several reported incidental releases including: over flow of 100-gallons of sewage from a manhole in 2007 believed to be due to a blocked grease interceptor; a release of Freon gas in 2016 due to unknown reasons; and, a release of Freon gas in 2016 due to a broken pipe from the main refrigeration rack. Costco was also listed in the Facility and Manifest database (HAZNET), Facility Index System (FINDS), Enforcement and Compliance History Online (ECHO) and Resource Conservation and Recovery Act (RCRA) Large Quantity Generator (LQG) databases for having generated and disposed of varying quantities of off-specification or aged surplus organics/inorganics, pharmaceutical waste, halogenated solvents, oxygenated solvents, asbestos-containing waste, and unspecified solvent mixtures in 2014 and 2016. The listing information reviewed for the Costco facility does not suggest evidence of a REC to the Site.
"Brite Cleaners dba, Neshia Enterprises"; "RSR Enterprises, Inc"; "Chase Cleaners"; "Martinizing Cleaners"	2530 Bryan Avenue Suite C	Adjoins northeast	These facilities are listed in various databases searched by EDR. Based on our review of the database listing information, a dry-cleaning facility has been present at this location between at least 2000 and 2014. Martinizing Cleaners was reported as a SQG of hazardous waste, including PCE and TCE. Chase Cleaners is indicated to be active at this location. No releases or violations were reported for these facilities. However, the potential for undocumented spills or releases to have occurred is considered a REC.
"Tustin Ranch Collision"; "Tustin Hyundai"; "Tustin Chevrolet"; "Executive Pontiac"; "Tustin Chevrolet Geo"; "Long Automotive Inc"	16 Auto Center Drive	Approximately 475 feet south-southeast	These facilities are listed in various databases searched by EDR. Notably, the Tustin Ranch Collision facility had a release of gasoline, reported in October 2008, that affected groundwater. The case (Case No. 08UT009) was indicated to be closed as of May 23, 2011. Remediation was completed and the case (Case No. 08UT009) closed as of May 23, 2011. Further discussion is provided in Section 4.3.6. Based on the closure status and down-gradient to cross-gradient location from the Site, this facility is not considered a REC.
"Joe MacPherson Oldsmobile/Auto"; Caliber Collision Centers-Tustin"; "Joe Macpherson Mitsubishi"; "MacPherson Enter Inc. J"; "Joe Mac Pherson Automotive"	5 Auto Center Drive	Adjoins southwest	These facilities are located southwest of the Site across El Camino Real, but are considered adjoining pursuant to the Standard Practice. The facilities are listed in various databases searched by EDR that indicate the use/storage of hazardous materials and petroleum products, and generation of hazardous waste. No releases are reported for this location. Thus, these facilities are not considered a REC.



**Table 4-1 (Continued)**  
**Off-Site Facilities of Potential Concern**

FACILITY OR SITE NAME	FACILITY OR SITE ADDRESS	PROXIMITY TO SITE (FEET)	COMMENTS
"DCH Tustin Acura"; "Tustin Acura"	9 Auto Center Drive	Adjoins south	This facility is located south of the Site across El Camino Real, but is considered adjoining pursuant to the Standard Practice. The facility is listed in various databases searched by EDR that indicate the use/storage of hazardous materials, and generation of hazardous waste. The facility had a release of gasoline in 1988 that affected soil only. The case (Case No. 88UT148) was reported closed as of August 22, 1990. A release of gasoline was also reported in 2002 during tank removal activities. Groundwater was indicated to have been affected. Remediation was completed and the case (Case No. 02UT021) closed as of May 5, 2006. Further discussion is provided in Section 4.3.6. Based on the closure status and down-gradient to cross-gradient location from the Site, this facility is not considered a REC.
APSI Chevron-1491201233; Chevron # 201233/1491	2740 Bryan Avenue	Approximately 900 feet southeast	This facility is listed in various databases. It is indicated to be a SQG of ignitable hazardous waste associated with a gasoline service station. The Site is registered in the UST database. No violations or releases were reported for this facility. Based on the distance and down-gradient to cross-gradient direction of this facility from the Site, it is not considered a REC.
Beacon Bay Car Wash	2762 El Camino Real	Approximately 1,000 feet southeast	This facility is listed in various databases searched by EDR. The facility maintains fuel USTs; however, no violations or releases have been reported. Based on the down-gradient direction from the Site and lack of reported releases, this facility is not considered a REC.
"Power Ford Tustin"; "Joe MacPherson Ford"; "Auto Nation Ford"	2 Auto Center Drive	Approximately 475 feet southwest	This automobile facility is listed in various databases searched by EDR that indicate the use/storage of hazardous materials or petroleum products, and generation of hazardous waste. No releases are reported at this facility location. Based on the distance and lack of reported releases, this facility is not considered a REC.
"Tustin Buick/GMC"; "Tustin Buick Pontiac GMC Hummer"; "McLean Cadillac"	1 Auto Center Drive	Adjoins southwest	This automobile facility is listed in various databases searched by EDR that indicate the use/storage of hazardous materials or petroleum products, and generation of hazardous waste. The McLean Cadillac facility reportedly maintained four USTs between at least 1988 and 1992; however, the Cadillac dealership had relocated, and no registration of the USTs was found. Therefore, it is assumed the USTs are no longer active and/or present. No releases were reported at this facility location. Based on the lack of current registration information and lack of reported releases, this facility is not considered a REC.
"Nestle Purina Petcare Company"	Kern County, CA	Not applicable	This facility is plotted by EDR to be located north of the intersection of Bryan Avenue and Tustin Ranch Road. However, the listing information refers to the facility's Maricopa Plant, which is located in Kern County, California. Therefore, this facility is not considered a REC to the Site.
Marketplace Cleaners	2981 El Camino Real	Approximately 2,300 feet southeast	This dry-cleaning facility is listed as having had a release of PCE, although the date of the release and quantity are not reported. The County of Orange issued a Closure Certification on June 13, 1997, but the Regional Water Quality Control Board (RWQCB) has an open case status as of June 23, 2009. Although this case appears to be open with the RWQCB, based on the distance and down-gradient direction from the Site, it is not considered a REC.

### 4.2.3 Orphan List

Facilities not plotted by EDR due to poor or inadequate address information are referred to as orphan facilities. Two orphan facilities are listed. However, based on one or more of the criteria outlined in Section 4.1 above, the listed orphan facilities are not considered RECs likely to affect environmental conditions beneath the Site.

### 4.3 OTHER RECORDS REVIEWED / AGENCIES CONTACTED

The following additional sources of environmental records were reviewed during this Phase I ESA for the purposes of meeting the Standard Practice. Local regulatory agencies were contacted for reasonably ascertainable and practically reviewable documentation regarding RECs present at the Site and adjoining facilities. Summaries of interviews with local regulatory agency representatives, when performed, are included in Section 7 of this report (with interview documentation included in Appendix C). Information was obtained or reviewed from the following agencies:

- ..... Pipeline and Hazardous Materials Safety Administration (PHMSA), National Pipeline Mapping System (NPMS)
- ..... State of California, Division of Oil, Gas and Geothermal Resources (DOGGR)
- ..... Building and Safety Department
- ..... South Coast Air Quality Management District (SCAQMD)
- ..... Orange County Health Care Agency (OCHCA)
- ..... State Water Resources Control Board, GeoTracker™
- ..... Department of Toxic Substances Control (DTSC)

Information/responses from the agencies contacted and agency databases reviewed is presented below:

#### 4.3.1 Pipeline and Hazardous Materials Safety Administration, National Pipeline Mapping System

Pipeline information is available at the PHMSA's online NPMS website (<https://www.npms.phmsa.dot.gov>). Kleinfelder researched pipeline information on the website on June 28, 2018 for the Site and vicinity. Based on Kleinfelder's review of the NPMS website, no mapped natural gas transmission pipelines or hazardous liquid pipelines are located on Site. However, SFPP, LP operates two hazardous liquid pipelines, which are depicted west of the Site, running parallel along Tustin Ranch Road. Both pipelines are indicated to be active, but only one

of the pipelines is indicated to be filled. No releases were reported to have occurred along these pipelines in the vicinity of the Site. A copy of the NPMS map is included in Appendix C.

#### 4.3.2 State of California Division of Oil, Gas and Geothermal Resources

Kleinfelder searched the State of California DOGGR website (<http://www.conservation.ca.gov/dog>) for oil and gas wells at the Site or in the Site vicinity. No oil or gas wells are depicted in the immediate vicinity of the Site. A copy of the DOGGR map results is presented in Appendix C.

#### 4.3.3 Building and Safety Department

Building permits were provided for the Site by the City of Tustin Building Division. A summary of permits for the Site is provided below:

##### 2541 El Camino Real (APN 500-185-05)

- May 6, 1997 – Building permit issued to Henry Kumagai for construction of a new automotive service building.
- May 31, 1997 – Building permit issued to Henry Kumagai for precise grading for a new 9,735 square-foot, one-story automotive service building with a mezzanine.
- July 29, 1997 – Building permit issued to Henry Kumagai for installation of fire sprinklers for a new service building.
- October 1, 1997 – Building permit issued to Henry Kumagai as owner, and Goodyear Tire as the tenant, for the installation of 10 hydraulic lifts.
- March 3, 1998 – Certificate of Occupancy issued to Henry Kumagai as the owner and Tustin Ranch Goodyear as the tenant.
- May 21, 1998 – Building permit issued to Goodyear for three internally illuminated wall signs.
- November 19, 2010 – Permit issued to Imperial T&L to slurry and restripe excess accessible parking stalls and convert to standard stalls.

2505 El Camino Real (APN 500-185-06)

- A building permit was issued to K-Mart on April 26, 1993 for the construction of a new retail store. Other permits were issued to K-Mart between May 24, 1993 and March 25, 1997 associated with the new retail building, including: plumbing; electrical; heating, ventilation, and refrigeration; fire alarms/suppression systems; tenant improvements associated with a vision center and portrait area; and seismic anchorage for storage racks. A Certificate of Occupancy was issued to K-Mart on July 14, 1994.
- Permits dated between April 25, 2005 and November 2, 2005 were issued to FGHK LTD for various improvements, including: fixtures, optical and portrait area associated with Sears; installation of fire sprinklers and alarms system; and, replacement of propane storage cages.
- A September 9, 2011 permit was issued to Chemical Trust Co CA for tenant improvements to a 72,650 square-foot building for a supermarket. Subsequent permits were issued to Chemical Trust Co CA between February 3, 2012 and February 28, 2017 associated with: installation of signs; fire sprinkler systems and alarms; demolition of non-load-bearing partition walls; installation of a sink for an eyebrow threading station; and, other tenant improvements (e.g., new offices, restrooms, partition walls, water heater, hood for pizza oven, and outdoor dining area). The permits appeared to be associated with a supermarket (Aria International Market), Ansar Gallery (March 2014), and Bubbly's Cafe (November 2016).

The potential for subsurface contamination to be present as a result of activities associated with the Goodyear facility (e.g., potential leakage from hydraulic hoists) represents a REC. Other building permit information for the Site did not suggest evidence of a REC. A copy of building permit information provided by the City of Tustin Building Division is provided in Appendix C.

#### 4.3.4 South Coast Air Quality Management District

Kleinfelder searched the SCAQMD web tool (<http://www.aqmd.gov/nav/online-services/public-records/public-document-search/>) on July 30, 2018 for available information pertaining to the Site. No permits were indicated to be associated with the address 2541 El Camino Real. Information associated with 2505 El Camino Real is summarized below.

- “Ansar Gallery” – This facility is listed active, but with no permitted equipment. A Notice to Comply was issued on December 13, 2013, which indicated registration for chillers with

greater than 50 pounds of refrigerant should be submitted. Compliance was achieved the same day the Notice to Comply was issued.

- “Heidar Baba International Restaurant” – This facility is listed active. A permit was issued on June 17, 2016 to operate a charcoal charbroiler; however, the permit status is indicated to be inactive. A Notice to Comply was issued on April 29, 2016 for failure to register the charbroiler where meat juices fall into open flames. Upon re-inspection on May 24, 2016, the facility was indicated to be in compliance.
- “K-Mart Stores” – This facility is listed active, but with no permitted equipment. No violations or Notices to Comply were issued for this facility.

A copy of the information obtained from the SCAQMD website is provided in Appendix C.

#### 4.3.5 Orange County Health Care Agency

Kleinfelder reviewed available information for the Site at the OCHCA on August 21, 2018. According to a representative of the OCHCA, a hazardous waste file was available for the Site address 2505 El Camino Real, but the file was purged in 2010 due to inactivity. Thus, no records for this address were available for review. Records for the Site address 2541 El Camino Real was available for Tustin Ranch Tire & Auto. Inspection and general audit reports were available between 2008 and 2014. The information contained in the inspection and audit reports indicates the facility has maintained two 500-gallon new oil ASTs, a 300-gallon new oil AST, a 110-gallon transmission fluid AST, and a 500-gallon used oil AST since 1998, when the ASTs were installed. Each of the ASTs was indicated to be constructed of steel with secondary containment. No significant violations were reported for this facility.

#### 4.3.6 State Water Resources Control Board

Kleinfelder reviewed the SWRCB GeoTracker™ database (<http://geotracker.waterboards.ca.gov/>) on June 28, 2018 for information pertaining to the Site and adjoining properties. The Site is not listed. One adjoining property was listed that had a reported release, and is summarized below.

Tustin Acura (9 Auto Center Drive) – This facility is located south of the Site, beyond El Camino Real, but is considered adjoining pursuant to the Standard Practice. The facility had a release of gasoline, discovered during the removal of a UST in 2002. Groundwater monitoring was performed between February 2004 and May 2005. Total petroleum hydrocarbons in the gasoline (TPHg) range and benzene were detected at maximum concentrations of 138 micrograms per

liter ( $\mu\text{g/L}$ ) and 38  $\mu\text{g/L}$ , respectively. Methyl *tertiary* butyl ether (MtBE) was detected at a maximum concentration of 52  $\mu\text{g/L}$ . TPHg and benzene were not detected in samples in the latest three monitoring events. MtBE was detected in one sample during the last three monitoring events, with a concentration of 7  $\mu\text{g/L}$  detected in well MW3 in May 2005 (The Reynolds Group, 2005). The OCHCA issued closure for the case on May 5, 2006. Based on our review, the monitoring wells were located at least 300 feet south of the Site. Groundwater was encountered at depths between 14 and 16 feet below ground surface (bgs) and was reported to flow consistently to the east and southeast, in a down-gradient location from the Site. Based on this information, the release from this facility is not considered a REC likely to have affected soil, soil vapor or groundwater beneath the Site.

#### 4.3.7 Department of Toxic Substances Control

Kleinfelder reviewed the DTSC's EnviroStor website (<https://www.envirostor.dtsc.ca.gov/public/>) on June 28, 2018, for available files pertaining to the Site and adjoining properties. The Site and adjoining properties are not listed. A copy of the EnviroStor search results is presented in Appendix C.

#### 4.4 PHYSICAL SETTING SOURCE(S)

Table 4-2 presents information concerning the physical setting of the Site. The information was primarily obtained from published maps.

**TABLE 4-2**  
**Physical Setting**

<b>DATA</b>	<b>GENERAL INFORMATION</b>
USGS TOPOGRAPHIC QUADRANGLE	Based on the United States Geological Survey (USGS) Tustin Quadrangle 7.5-Minute Series (Topographic) Map, dated 1981, the Site elevation ranges between approximately 85 and 90 feet above mean sea level (msl). The Site has a slight topographical slope towards the southwest.
SOIL TYPE	Soil beneath the Site consists of clay loam to silty clay loam with moderate infiltration rates, moderately well to well drained soils. (EDR, 2018b).
OIL AND GAS WELLS	Information concerning oil and gas fields was obtained by Kleinfelder on June 28, 2018 from the DOGGR website ( <a href="http://www.conservation.ca.gov/dog">http://www.conservation.ca.gov/dog</a> ). Based on Kleinfelder's review, no oil or gas wells are located within the immediate vicinity of the Site.

Table 4-3 presents information concerning regional geology and hydrogeology. The information was obtained from published maps and other sources.

**TABLE 4-3**  
**Regional Geology and Hydrogeology**

<b>PHYSICAL PARAMETER</b>	<b>INFORMATION/COMMENTS</b>
REGIONAL PHYSIOGRAPHY AND GEOLOGY	The Site is located in the Peninsular Ranges Geomorphic Province of Southern California. The Peninsular Ranges are a series of ranges separated by northwest-trending valleys extending from south of the Santa Monica Mountains and bound by the Colorado Desert (California Geological Survey [CGS], 2002).
REGIONAL HYDROGEOLOGY	The Site is located within the Coastal Plain of Orange County Groundwater Basin, which underlies a coastal alluvial plain in the northwestern portion of Orange County. The basin is bound by consolidated rocks exposed on the north in the Puente and Chino Hills, on the east in the Santa Ana Mountains, and on the south in the San Joaquin Hills. The basin is bound by the Pacific Ocean to the southwest, and by a low topographic divide approximated by Orange County – Los Angeles County line on the northwest (California Department of Water Resources [CDWR], 2004).
DEPTH TO GROUNDWATER DIRECTION OF ANTICIPATED FLOW <sup>1</sup>	Based on information obtained from the SWRCB GeoTracker™ database, groundwater was reportedly encountered at depths between 14 and 16 feet bgs at a property located adjoining to the south of the Site. Groundwater flow was reported consistently towards the east and southeast based on groundwater monitoring performed between 2004 and 2005 (The Reynolds Group, 2005). Groundwater at two other facilities located between 700 and 1,800 feet southeast of the Site was reported to flow to the west (Ocean Blue Engineers, Inc., 2010) and to the west-southwest (CDM Smith, 2012).
REGIONAL GROUNDWATER QUALITY PROBLEMS	Groundwater within the Coastal Plain of Orange County Groundwater Basin is primarily sodium-calcium bicarbonate. Impairments include sea water intrusion near the coast; colored water from natural organic materials in the lower aquifer system; and, increasing salinity, high nitrates and MtBE. However, regional groundwater quality problems were not identified in the vicinity of the Site.
WATER SUPPLY	The Site is connected to the municipal water system.
FLOOD ZONE DESIGNATION	According to The EDR Radius Map™ Report with GeoCheck®, the Site is not located within a 100-year or 500-year flood zone (EDR, 2018b). However, the adjoining concrete-lined channel along the southeastern Site boundary is depicted within a 500-year flood zone.

<sup>1</sup> Groundwater flow direction is based on regional information sources. Site-specific conditions may vary due to a variety of factors including geologic anomalies, utilities, nearby pumping wells (if present), and others.

#### 4.5 USER PROVIDED INFORMATION

According to the Client, the purpose for performing this Phase I ESA is to evaluate the potential for RECs at the Site prior to purchasing APN 500-185-05 (Goodyear parcel) and leasing APN 500-185-06. Information regarding the current owners/occupants of the Site is summarized in Table 4-4.

**TABLE 4-4  
Owner and Occupant Information**

ENTITY	NAME
OWNER	According to the <i>EDR Environmental Lien and AUL Search</i> report (EDR, 2018a), the current owners of the Site parcels are indicated to be: Henry Kumagai and Judy Kumagai and Ted H. Ike and Gail F. Ike (APN 500-185-05); and, "Kmart Corporation" (APN 500-185-06).
OCCUPANT(S)	The former supermarket building on APN 500-185-06 is currently vacant. Goodyear (Tustin Ranch Tire and Auto Center) occupies the building on APN 500-185-05.

Summaries of interviews of key individuals with knowledge of the Site ("Key Site Managers") are provided in Section 7. The following sections present information provided to Kleinfelder by the Client.

#### 4.6 TITLE RECORDS

Chain-of-title information was not provided by the Client. Therefore, a review of a chain-of-title report was not reviewed as part of this Phase I ESA.

#### 4.7 ENVIRONMENTAL LIENS AND USAGE LIMITATIONS

According to information provided in EDR's regulatory agency database search report (EDR, 2018b), there are no liens pertaining to the Site listed in the Federal superfund liens list maintained by the United States Environmental Protection Agency (US EPA), nor known recorded land-use environmental deed restrictions pertaining to the Site listed in the State Liens Database. Kleinfelder's review of the *EDR Environmental Lien and AUL Search* report (EDR, 2018a) indicated no environmental liens or activity and use limitations (AULs) are associated with the Site (Appendix C).

#### 4.8 VALUE REDUCTION

As part of the Standard Practice process, information is to be gathered regarding the prospective purchase price of the Site relative to its fair market value. If there appears to be a value reduction, that reduction must be identified with respect to whether the difference may be attributed to environmental degradation of the property. The Client has not yet provided Kleinfelder with information pertaining to whether the purchase price of the property reflects the fair market value for the Goodyear parcel it intends to purchase. Since the Client intends to lease APN 500-185-

06, the question regarding whether the purchase price of the property reflects the fair market value is not applicable for that property.

#### 4.9 OTHER INFORMATION / DOCUMENTS PROVIDED

Other information and documents pertaining to the Site were not provided to Kleinfelder for review.

**5 SITE HISTORY**

The history of the Site was researched to identify obvious uses. Historical land use was researched to the first developed use, or back to 1940, whichever was earlier or readily available. Table 5-1 summarizes the availability of information reviewed during this assessment.

**TABLE 5-1  
Historical Information Sources**

<b>SOURCE</b>	<b>YEARS REVIEWED</b>	<b>SOURCE / AVAILABILITY</b>
SANBORN FIRE INSURANCE MAPS	Not available	EDR, 2018c
AERIAL PHOTOGRAPHS	1938, 1946, 1952, 1963, 1972, 1977, 1985, 1989, 1994, 2005, 2009, 2012, and 2016	EDR, 2018d
CITY DIRECTORIES	1962 through 2014 (select years)	EDR, 2018e
HISTORICAL TOPOGRAPHIC MAP REPORT	1896, 1901, 1902, 1932, 1935, 1942, 1948, 1950, 1965, 1972, 1981, and 2012	EDR, 2018f
BUILDING DEPARTMENT	1993 - 2017	City of Tustin Building Division
PREVIOUS ASSESSMENT(S)	Not available	Not available

**5.1 SANBORN FIRE INSURANCE MAPS**

Sanborn Fire Insurance Maps provide historical land use information for some metropolitan areas and small, established towns. Kleinfelder requested EDR to search its library of Sanborn Fire Insurance Maps for maps of the Site. EDR responded that Sanborn Fire Insurance Maps were not available for the Site (EDR, 2018c) (Appendix D).

**5.2 AERIAL PHOTOGRAPHS**

A review of historical aerial photography may indicate past activities at a property that may not be documented by other means or observed during a reconnaissance visit. The effectiveness of this technique depends on the scale and quality of the photographs and the available coverage. Aerial photographs were obtained from several historical photograph collections through EDR (2018d) and span a period of 78 years. A tabulation of the aerial photographs reviewed by Kleinfelder is presented in Table 5-2. Copies of the aerial photographs provided by EDR are included in Appendix D.

**TABLE 5-2**  
**Historical Aerial Photographs Reviewed**

<b>YEAR</b>	<b>APPROXIMATE SCALE</b>	<b>SUMMARY</b>
1938 1946 1952	1" = 500'	<p><b>Site:</b> The Site appears to be developed for agricultural purposes (low-lying crops). No structures are evident on the Site. An unimproved road appears to pass through the field in a general northeast-southwest direction.</p> <p><b>Surrounding Area:</b> A road and the El Modena-Tustin Channel are apparent northeast of the Site; and the channel changes direction farther to the southeast of the Site. The surrounding area consists of agricultural land. A few structures are apparent southwest and southeast of the Site, although not adjoining. The structures southwest of the Site are gone by 1952.</p>
1963 1972 1977	1" = 500'	<p><b>Site:</b> The Site appears generally the same as in the previously reviewed aerial photographs.</p> <p><b>Surrounding Area:</b> Surrounding properties remain agricultural with the nearest structures apparent off-Site to the southeast. No structures adjoin the Site.</p>
1985	1" = 500'	<p><b>Site:</b> The Site appears generally the same as on the 1977 aerial photograph.</p> <p><b>Surrounding Area:</b> The surrounding area continues to be used for agricultural purposes, except properties to the northwest, west and southwest appear to be under construction (graded) for the present-day development of the area.</p>
1989	1" = 500'	<p><b>Site:</b> The Site appears to be fallow with no roads or structures.</p> <p><b>Surrounding Area:</b> Present-day roads are apparent, including Tustin Ranch Road (northwest), El Camino Real (southwest) and Bryant Road (northeast) of the Site. The surrounding areas appeared to be developed with present-day residential structures (northeast and northwest) and automobile related facilities (southwest). The adjoining property to the southeast is fallow, similar to the Site, with apparent on-going construction/development of the properties farther to the east and southeast.</p>
1994	1" = 500'	<p><b>Site:</b> The existing vacant supermarket building and associated parking areas are apparent on the Site. The Goodyear structure is not yet visible.</p> <p><b>Surrounding Area:</b> The adjoining properties and surrounding area appear generally the same as what was observed during the Site reconnaissance. However, the pad buildings that currently adjoin the Site to the northeast are not apparent.</p>
2005 2009 2012 2016	1" = 500'	<p><b>Site:</b> The Goodyear building is now apparent and the Site appears similar to present-day conditions.</p> <p><b>Surrounding Area:</b> The adjoining properties and surrounding area appear generally the same as what was observed during the Site reconnaissance.</p>

Note: Aerial photographs only provide information concerning indications of land use, and no conclusions regarding the release of hazardous substances or petroleum products can be drawn from the review of photographs alone.

### 5.3 CITY DIRECTORIES

City directories provide information regarding property occupants by address. EDR provided a city directory image report (EDR, 2018e), which included a review of city directories for properties along El Camino Real for select years between 1962 and 2014. City directory listings for properties along Bryant Avenue and Tustin Ranch Road were not provided by EDR. El Camino Real was not listed until the 1992 city directory. Site listings are summarized below:

- 2541 El Camino Real (APN 500-185-05) – This property was listed as occupied by “Anaheim Hills Tire Inc.” in the years 2000, 2005, 2010, and 2014.
- 2505 El Camino Real (APN 500-186-06) – This property was listed as occupied by “Kmart Corporation” in 2000. In 2005, the property was listed under multiple names including Jenny G Mach Hung Optometric, Kmart Corporation, Sears Optical. In 2010, listings included EFT, Kmart Corporation and Sears Optical. Allen Foods was listed at this address in 2014.

Adjoining property listings along El Camino Real included the following:

- 2655 El Camino Real – “Costco One Hour Photo” and “Costco Wholesale Corporation” were listed as the occupant of this adjoining property in the 1995, 2000 and 2005 city directories. In 2010 and 2014, “Costco Wholesale Corporation” was listed at this location.

### 5.4 HISTORICAL TOPOGRAPHIC MAP REVIEW

Kleinfelder obtained information regarding historical topographic maps of the Site vicinity from EDR (2018f). The topographic maps reviewed for this assessment are listed in Table 5-3 and copies of the maps are included in Appendix D.

**TABLE 5-3**  
**Historical Topographic Maps Reviewed**

YEAR	SCALE	SUMMARY
1896 1901 1902	1:24,000	<b>Site:</b> The Site is depicted as undeveloped land. <b>Surrounding Area:</b> The immediate Site vicinity is depicted as undeveloped land. A road is present along the southwestern border of the Site.

**TABLE 5-3 (Continued)**  
**Historical Topographic Maps Reviewed**

YEAR	SCALE	SUMMARY
1932 1935	1:24,000	<p><b>Site:</b> The Site is depicted as undeveloped land, although an unimproved road is shown passing generally northeast-southwest through the Site.</p> <p><b>Surrounding Area:</b> The immediate Site vicinity is depicted generally undeveloped. However, Bryant Road and a canal are shown northeast of the Site. Scattered residential size structures are shown off-Site to the southwest and southeast.</p>
1942 1948 1950 1965 1972	1:24,000	<p><b>Site:</b> The Site is depicted generally the same as on the previously-reviewed maps.</p> <p><b>Surrounding Area:</b> The surrounding properties are shown generally the same as on the previously-reviewed maps, although Bryant Road appears to have been improved. Residential-size structures off-Site to the southwest are no longer shown.</p>
1981	1:24,000	<p><b>Site:</b> The Site is depicted generally the same as on the previously-reviewed maps, except the unimproved road passing through the Site is no longer shown.</p> <p><b>Surrounding Area:</b> The surrounding area appears similar to previously reviewed maps with the exception that the land to the south is increasingly more developed with commercial properties.</p>
2012	1:24,000	<p><b>Site:</b> The 2012 topographic map depicts physical features (e.g., roads and surface water) with no structures. A road passes through the Site in a northeast-southwest direction. No structures are depicted.</p> <p><b>Surrounding Area:</b> Tustin Ranch Road and El Camino Real are now shown adjoining the northwestern and southwestern borders of the Site. Other off-Site roads are shown in current configurations. No structures are shown on the map.</p>

## 5.5 BUILDING PERMITS

Building permits for the Site were provided by the City of Tustin Building Division. A summary is provided in Section 4.3.

## 5.6 PREVIOUS ASSESSMENTS

No previous environmental assessments were available for the Site.

**6 SITE RECONNAISSANCE**

Kleinfelder's Phase I ESA activities included a Site reconnaissance. This section summarizes the findings from the Site reconnaissance.

**6.1 METHODOLOGY AND LIMITING CONDITIONS**

Mr. Pasquale Amendola of Kleinfelder performed a Site reconnaissance of the Site parking lot and Site vicinity on July 13, 2018. Mr. Paolo Dizon and Ms. Lindsey Dandridge-Perry of Kleinfelder performed a Site reconnaissance of the Goodyear facility on August 1, 2018. Access had not been provided into the vacant former supermarket building. The Site reconnaissance included a visual inspection of the Site to assist in identifying the presence or likely presence of hazardous substances or petroleum hydrocarbons under conditions that indicate an existing release, a past release, or threat of release into structures, soil, groundwater, or surface water at the Site (i.e., RECs). Observations of readily-apparent environmental conditions are summarized in Table 6-1, and color photographs of the Site are presented on Figures 4A through 4O. The approximate Site boundaries are shown on Figure 2. A detail map of the Goodyear facility is shown on Figure 3.

**6.2 GENERAL SITE SETTING**

The Site consists of two parcels of land located on the eastern corner of the intersection of Tustin Ranch Road and El Camino Real, in the City of Tustin, Orange County, California. It is located within an area developed with a mix of residential, commercial and automobile-related properties.

**6.3 SITE OBSERVATIONS**

Kleinfelder's Site observations are summarized in Table 6-1.

**TABLE 6-1  
Site Observations**

GENERAL OBSERVATIONS	REMARKS	OBSERVED	NOT OBSERVED
Current use	International supermarket (vacant), Goodyear facility, and associated parking and landscaping.	X	
Current use likely to indicate RECs	The use of oils and potential leaks from automotive repair activities, in-ground hoists, and a 3-stage clarifier from the Goodyear facility represent RECs.	X	

**TABLE 6-1 (Continued)**  
**Site Observations**

GENERAL OBSERVATIONS	REMARKS	OBSERVED	NOT OBSERVED
Past use	The Site was historically used for agricultural purposes between at least 1938 and 1985. The existing supermarket building was constructed in 1993 and was occupied by a retail store (K-Mart and Sears) through at least 2005. Since at least 2011, the building was occupied by a supermarket. The Goodyear facility was constructed in late-1997.		X
Past use likely to indicate RECs	The routine application of pesticides on agricultural properties is not considered a REC pursuant to the Standard Practice. Since the Site has been redeveloped, the potential for residual pesticides to be present in shallow soil is considered low.		X
Structures	The Site is developed with a vacant supermarket building, and an active Goodyear service building.	X	
Roads			X
Topography of Site and surrounding area	Topography of the Site is flat.	X	
<b>Interior and exterior observations or environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.</b>		<b>Observed</b>	<b>Not Observed</b>
Aboveground storage tanks (ASTs)	Four ASTs (three motor oil, and one used oil) in Goodyear facility.	X	
Below grade vaults	Three-stage clarifier within Goodyear facility.	X	
Burned or buried debris			X
Chemical storage	Waste antifreeze and gear oil drums stored in Goodyear facility.	X	
Chemical mixing areas			X
Discolored soil or water			X
Ditches, streams			X

**TABLE 6-1 (Continued)**  
**Site Observations**

<b>Interior and exterior observations or environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.</b>		<b>Observed</b>	<b>Not Observed</b>
Drains and piping	Drains were observed in the Goodyear facility.	X	
Drums	Five drums for used filters, one drum gear oil, five drums antifreeze and waste antifreeze, and two drums miscellaneous waste auto parts.	X	
Electrical or hydraulic equipment (polychlorinated biphenyls [PCBs])	Three pad-mounted transformers observed on Site. No evidence of leakage or staining was observed. Potential for PCBs in oil associated active/abandoned in-ground hoists.	X	
Fill dirt from an unknown source			X
Fill dirt from a known source			X
Hazardous chemical and petroleum products in connection with known use	Hazardous chemicals and petroleum products stored at the Goodyear facility.	X	
Hazardous chemical and petroleum products in connection with unknown use			X
Non-hazardous containers with contents	Drums with waste auto parts.	X	
Hazardous waste storage	ASTs and drums contained waste oils, used oil/fuel filters and waste antifreeze at the Goodyear facility.	X	
Heating and cooling system and fuel source			X
Industrial waste treatment equipment			X
Loading and unloading areas	Loading area located northeast of the supermarket building.	X	
Odors			X
Pits, ponds, or lagoons			X
Pools of liquid	Antifreeze or coolant leaking from car inside a service bay at the Goodyear facility.	X	
Process waste water			X

**TABLE 6-1 (Continued)**  
**Site Observations**

<b>Interior and exterior observations or environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.</b>		<b>Observed</b>	<b>Not Observed</b>
Sanitary sewer system	The Site is connected to the municipal sewer system. Sewer line is located in the parking lot southeast of the off-Site McDonalds restaurant. Sewer manhole was located west of the Goodyear facility.	X	
Septic system (e.g. tank and leach fields)			X
Soil piles			X
Solid waste/evidence of unauthorized dumping			X
Stained pavement, soil or concrete	Normal ( <i>de minimis</i> ) staining throughout parking lot area from parked cars. Multiple areas of oil staining on the floor in the Goodyear facility near used-oil AST, near antifreeze drums under car jacks, near a drain in one of the bays, and near curb outside of the Goodyear facility.	X	
Stains or corrosion (interior, non-water)	Possible corrosion of concrete floor under stored used batteries at the Goodyear facility.	X	
Storm drains/catch basins	Several storm drains observed throughout the Site.	X	
Stressed vegetation			X
Sumps and clarifiers	One three-stage clarifier observed at the Goodyear facility.	X	
Surface water			X
UST(s) (including heating oil tanks)			X
Unidentified substance containers			X
Waste water discharge			X
Water supplies (potable and process)	The Site is connected to the municipal water supply.	X	
Wells (irrigation, monitoring, or domestic)			X

**TABLE 6-1 (Continued)**  
**Site Observations**

Interior and exterior observations or environmental conditions that may involve the use, storage, disposal or generation of hazardous substances or petroleum products.	Observed	Not Observed
Wells (dry)		X
Wells (oil and gas)		X

#### 6.4 RESULTS OF SITE RECONNAISSANCE

The Site is currently occupied by a vacant former international supermarket, a Goodyear facility, and retail center parking lot. A Costco Wholesale Warehouse is located adjoining the Site to the southeast and other retail businesses adjoin the Site to the north and northeast. Access had not been granted to the supermarket building, therefore the interior of that building was not observed during the Site reconnaissance. The following observations were made during the parking lot Site reconnaissance. The Site parking lot consisted of asphalt-paved parking and landscaping. Parking lot lighting and other utility infrastructure was observed. Three pad-mounted transformers were observed; one at the western corner of the existing supermarket building; one in the parking lot in front of the supermarket, and one on the eastern side of the supermarket behind the Goodyear facility. No evidence of leakage or staining was observed. Drains observed on-Site included catch basins and storm drains located around the perimeter of the Site. No evidence of standing liquid or staining was observed. Some household trash was observed scattered around dumpsters in the loading dock area associated with the supermarket.

During the Goodyear Site reconnaissance, Kleinfelder met with the Service Manager (Jim Crowell), the Goodyear broker (Kevin), the Goodyear regional representative, and the Costco representative (Steve MacArthur). The Goodyear facility had three bay areas (west, north, and east) with a yard in the middle. According to Jim, the Goodyear was built in 1997 and Jim has been the service manager since its construction. The three-stage clarifier was located in the yard. The store front was located on the east side of the building. Two in-ground hoists, an above-ground hoist, an abandoned in-ground hoist, multiple storage racks with motor oil, brake cleaner, used car batteries, and other supplies, were located in the east bay. The electrical control panel and hydraulic system were also present in the east bay. Some of the used car batteries had signs of leakage and the concrete beneath the batteries appeared corroded.

Five in-ground hoists, three motor oil ASTs (two 500-gallon capacity, and one 300-gallon capacity), one used oil AST (500-gallon capacity), one above-ground hoist, an air compressor system, one abandoned in-ground hoist, and six drums (five contained used filters) were present in the west bay. A leak (possible antifreeze) from a car under repair was observed on the floor. Oil staining was observed on the floor in the vicinity of the used oil AST.

A drum containing gear oil, five drums containing antifreeze, leaky floor jacks, and other equipment were stored in the yard adjoining the west bay. Oil staining was observed under the jacks. The antifreeze drums were stored on secondary containment.

Six in-ground hoists were observed in the north bay. Oil was observed around the bolts of one of these in-ground hoists (this may be the result of a possible seal break or surface spill). A parts cleaner was observed along the north wall of the north service bay. According to Jim, hot water and soap was used instead of solvents. Multiple containers of motor oil and other chemicals associated with automotive processes were observed throughout the bays.

Two asphalt patched areas with patched trenching were present west of the Goodyear building. Per Jim, these patches were associated with sewer repairs. A tire storage area, two dumpsters, and two 55-gallon drums with used automotive parts were stored against the supermarket wall, west of the Goodyear. Minor staining was observed on the asphalt. An unknown patch in the concrete was located south of the Goodyear yard area, and oil staining was observed on the curb south of the Goodyear.

Evidence of discolored water, stressed vegetation, USTs, wells, pits, ponds, or lagoons was not observed on the Site during the reconnaissance.

## 7 INTERVIEWS

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Key Site Managers are contacted to obtain current and historical environmental information concerning the Site. The following sections highlight information revealed during the interviews.

### 7.1 INTERVIEW WITH CLIENT/OTHERS

Kleinfelder distributed a User Questionnaire to Ms. Jenifer Murillo, Director of Real Estate Development for Costco, on June 27, 2018. A completed questionnaire has not been received to date.

### 7.2 INTERVIEW WITH OWNER/MANAGER

Kleinfelder spoke with the Goodyear service manager, Mr. Jim Crowell, during the Site reconnaissance. Jim had been the service manager for Goodyear since it was built in 1997. During the Site walk, Jim indicated that the two observed abandoned in-ground hoists had been for trucks, and had not been used and were abandoned. Jim indicated that the three-stage clarifier gets serviced every other year. Also, Jim indicated that parts cleaner uses hot water and soap, instead of a solvent. Additional information obtained from Jim at the time of the Site reconnaissance is included in Section 6.

### 7.3 INTERVIEW WITH OCCUPANT(S)

At the request of Costco, occupants were not interviewed during the Site reconnaissance.

### 7.4 INTERVIEWS WITH LOCAL GOVERNMENT OFFICIALS

Interviews with representatives of these agencies were deemed unnecessary and were not performed as part of the Phase I ESA.

## 8 EVALUATION

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Kleinfelder performed this Phase I ESA of the Site in conformance with the scope and limitations of the Standard Practice, the scope of services in our Proposal No. MPCOSTCO.001C/IRV18P73076 dated June 27, 2018, and in accordance with Costco Wholesale Development Requirements, Version 2014, Revised June 13, 2014. The following sections describe Kleinfelder's findings and provide general background information about the Site. Findings address RECs, HRECs, CRECs, and notation of *de minimis* quantities, as applicable to the Site. In summary, Kleinfelder's assessment revealed the following information concerning the Site:

### 8.1 BACKGROUND

The following is a summary of the Site background information:

- The Site is located on the eastern corner of the intersection of Tustin Ranch Road and El Camino Real in the City of Tustin, Orange County, California (see Figure 1). It consists of the following two parcels of land (see Figure 2):
  - APN 500-185-05 comprises approximately 1.0 acre of land and is assigned a street address of 2541 El Camino Real. This parcel is occupied by a Goodyear Tire and Auto Center (Goodyear) facility (referred to as Tustin Ranch Tire and Auto Center) and associated parking and landscaping.
  - APN 500-185-06 comprises approximately 9.1 acres of land and is associated with the address of 2505 El Camino Real. This parcel is occupied by a vacant international supermarket.
- The Site was historically used for agricultural purposes between at least 1938 and 1985. The existing Site building on APN 500-185-06 was constructed in 1993 and was occupied by retail stores, including K-Mart and Sears, until at least 2005. This building was remodeled in 2011 and was occupied by various facilities, including Aria International Market, Ansar Gallery, Heidar Baba International Restaurant, and Bubbly's café, which were associated with an international supermarket. The building is currently vacant. The existing service building on APN 500-185-05 was constructed as an automobile service center in late-1997 and it has been occupied by a Goodyear facility, operating previously under the name Anaheim Hills Tire Inc., and currently under the name Tustin Ranch Tire and Auto Center.

## 8.2 FINDINGS AND OPINIONS

The following is a summary of findings and opinions for the Site:

- Tustin Ranch Tire and Auto Center is listed in the EDR database report as a SQG of hazardous waste in 1997. It is also listed as a permitted AST facility through the County of Orange. No unauthorized releases or violations were reported for this Site facility.
- The Goodyear facility currently maintains hazardous materials and petroleum products, and generates hazardous waste typical of automobile-related facilities. The facility maintains two 500-gallon ASTs and one 300-gallon AST containing motor oil, and a 500-gallon AST containing used oil. Various 55-gallon drums containing oil, antifreeze, transmission fluid, used auto parts and batteries were observed throughout the Goodyear facility. Thirteen active and two abandoned in-ground hydraulic hoists, and two aboveground hydraulic hoists were observed. A three-stage clarifier is located in a yard in the middle of the Goodyear facility. A parts cleaning station was observed, but reportedly uses hot water and soap for cleaning. Small quantities of other chemicals used in automobile-related services (e.g., spray cans of brake cleaner, solvents, etc.) are present throughout the facility.
- Evidence of leakage and/or staining observed at the Goodyear facility included: leakage from several used car batteries on apparent corroded concrete; leakage from a car under repair at the time of the Site reconnaissance visit; oil staining on the floor near the used oil AST; oil staining on the floor beneath leaky floor jacks stored in the yard area; oil staining near a bolt of one in-ground hoist; and, an area of oil staining near a curb south of the Goodyear facility. In addition, two asphalt patched areas with patched trenching, reported to be associated with sewer repairs, were noted west of the Goodyear facility; and, an unknown patch was observed south of the Goodyear facility yard.
- Various dry-cleaning facilities were listed in the EDR database report as having occupied a tenant space in a building that adjoins the Site to the northeast at 2530 Bryan Avenue from at least 2000 through 2014. At least one of the dry-cleaning facilities used PCE and TCE in the dry-cleaning process. Currently, Chase Cleaners occupies this tenant space. No unauthorized releases were reported to have occurred at this facility location. However, the potential exists for undocumented releases to have occurred at this facility location. No other off-Site facilities were identified as potential concerns to the Site.

### 8.3 DEVIATIONS AND ADDITIONAL SERVICES

The scope of this Phase I ESA does not incorporate Standard Practice non-scope considerations, such as asbestos, lead, radon, lead in drinking water, industrial hygiene, health and safety, ecological resources, indoor air quality/vapor intrusion, and high-voltage power lines.

### 8.4 CONCLUSIONS

Kleinfelder has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-13 of two parcels of land identified by the Orange County Assessor as APNs 500-185-05 and 500-185-06, in the City of Tustin, Orange County, California. Any exceptions to, or deviations from, this practice are described in Section 8.3 of this report.

In summary, this assessment has revealed no evidence of CRECs in connection with the Site. The following RECs were noted:

- The potential for undocumented releases from the adjoining former and current dry-cleaning facilities, located northeast of the Site, represents a REC.
- The potential for subsurface contamination from former automobile-related activities represents a REC.

Based on the findings and conclusions of this Phase I ESA, Kleinfelder has the following recommendations for further assessment.

- Because Costco plans to lease APN 500-185-06, and because the portion of the parcel nearest the former and current off-Site dry-cleaning facilities, located northeast of the Site, will remain a surface parking lot, Kleinfelder does not recommend subsurface sampling at this time. However, if Costco should develop this area of the property with structures in the future, sampling is recommended to assess potential impacts resulting from the former and current off-Site dry-cleaning facilities.
- Subsurface sampling should be performed at the Goodyear facility to assess areas of concern (e.g., near in-ground hoists, near clarifier, and in areas of observed leakage/staining). In addition, unidentified patches should be assessed using geophysical survey methods to assess for the presence of subsurface features (e.g., underground storage tanks, etc.).

- A pre-renovation and demolition hazardous materials building survey should be performed of the existing structures to assess for the presence of ACMs, LBP, and other hazardous building materials such as fluorescent light ballasts.

## 8.5 DATA GAPS

Data gaps, which may affect the identification of hazardous substances or petroleum products for the evaluation of RECs at the Site, include the following:

- A completed User Questionnaire has not been received to date.
- Access to the interior of the vacant supermarket building on was not available; therefore, the interior of this building was not observed during the Site reconnaissance.

The absence of the questionnaires and observations of the interior of the vacant supermarket building do not constitute significant data failures.

9 REFERENCES

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## FIGURES

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**APPENDIX A**  
**STATEMENT OF QUALIFICATIONS**

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## STATEMENT OF QUALIFICATIONS

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We declare that to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all-appropriate inquiries in conformance with the standards and practices set forth in CFR Part 312.

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Lindsey Dandridge-Perry  
Staff Professional I

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Margaret R. Carroll  
Senior Environmental Professional

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Lizanne Simmons, PG  
Senior Principal Geologist

The resumes of above-listed environmental professionals performing this Phase I ESA are on file at the Kleinfelder office and are available upon request.

**APPENDIX B**  
**REGULATORY AGENCY DATABASE REPORT**

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**APPENDIX C**  
**USER PROVIDED AND REGULATORY AGENCY DOCUMENTATION**

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**APPENDIX D**  
**HISTORICAL RESEARCH DOCUMENTATION**

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