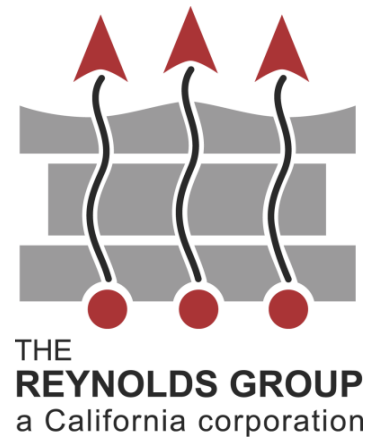


December 23, 2022  
(TRG #7424)

Mark Gilmartin, Esq.  
**Law Offices of Mark B. Gilmartin**  
1534 17<sup>th</sup> Street, Suite 103  
Santa Monica, California 90404



**PROPERTY: 5600 FRANKLIN AVENUE, LOS ANGELES, CALIFORNIA**

**SUBJECT: EVALUATION OF CURRENT ENVIRONMENTAL CONDITIONS AT THE FORMER SCOVEL PROPERTY**

Dear Mr. Gilmartin,

This report presents The Reynolds Group's (TRG) evaluation of current environmental conditions at the Former Scovel Property located at 5600 Franklin Avenue in Los Angeles, California (Site, see **Figure 1** – Site Location Map). The Site is an active Los Angeles Regional Water Quality Control Board (LARWQCB) leaking underground storage tank (LUST) case because of a gasoline release from historical fueling operations. All technical case information can be found on the State of California's database here: [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T10000005251](https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000005251), under the tab "Site Maps / Documents." TRG has completed corrective action activities at the Site under the oversight of the LARWQCB, including assessment and remediation of gasoline-impacted media.

At this time, the Site is being planned for redevelopment with a new four-story residential building with a subterranean parking garage. The building will consist of residential use on floors 1, 2, and 3, and residential amenities on floor 4. The subterranean parking garage will be ventilated, single-level, and extend to approximately 10 feet below the ground surface (bgs). The building and subterranean garage footprint will encompass the Site boundary, which includes the former gasoline station and adjoining residential building to the west (see **Attachment A** – Preliminary Building Plans). It is our understanding that as part of the redevelopment approval process, the City of Los Angeles has requested an evaluation of potential health risks to future occupants of the Site. As discussed herein, current environmental conditions at the Site have an acceptable risk to occupants of the proposed development.

## **BACKGROUND**

The soil and groundwater beneath the Site were impacted as a result of a gasoline release from historical fueling operations. Groundwater is encountered beneath the Site at approximately 85 to 87 feet below the ground surface (bgs) with a flow direction that has ranged historically to the south and more recently to the southeast (TRG, 2022b). To remediate the impacted soil and groundwater, a dual-phase extraction (DPE) system was operated from January 2020 to November 2021. Based on asymptotic soil vapor conditions and sustained low gasoline mass removal rates as a result of successful DPE, a rebound test was performed by TRG from December 2021 to January 2022. The results of the rebound test indicated little to no rebound in soil vapor gasoline concentrations, indicating that the gasoline soil impacts have been acceptably remediated (TRG, 2022c). Semi-annual groundwater monitoring has indicated gasoline constituent concentrations have been significantly reduced in groundwater as a result of remediation activities. The groundwater will be monitored on a semi-annual basis until a case closure determination is obtained from the LARWQCB.

## **EVALUATION OF CURRENT ENVIRONMENTAL CONDITIONS**

As previously discussed, a gasoline release impacted the soil, groundwater, and soil vapor beneath the Site. DPE activities have successfully remediated the impacted soil and significantly reduced gasoline constituent concentrations in groundwater. Furthermore, residual gasoline constituent concentrations that may be remaining in shallow soil will be excavated for the subterranean parking garage, and upon construction, the building and garage would limit direct exposure to future building occupants to any deeper residual concentrations that may be present in the soil. While groundwater continues to be impacted, no groundwater supply wells will be installed for potable use. And based on the depth of the groundwater beneath the ground surface, 85 to 87 feet bgs, there will be no direct exposure route to future occupants of the Site. The ventilation in the subterranean parking garage will also eliminate a direct pathway from residual soil vapor to the residents of the building. As a further conservative measure, to determine if soil vapor might still enter the parking garage, an additional soil vapor survey was completed in July 2022 to further verify the absence of a significant vapor intrusion concern. A

report called “Additional Groundwater and Soil Vapor Assessment” was prepared by TRG and submitted to the LARWQCB and on Geotracker (TRG, 2022c).

The July 2022 soil vapor survey included the installation and sampling of four soil vapor probes, designated VP-1 through VP-4 (**Figure 2**). The soil vapor probes were installed at 15 feet bgs to collect samples representative of the conditions beneath the future subterranean parking garage. The soil vapor survey was completed per a LARWQCB-approved workplan (Workplan; TRG, 2022a and LARWQCB, 2022).

### **Soil Vapor Analysis and Results**

The Reynolds Group prepared a complete report on the soil vapor survey. As shown in **Table 1** and **Figure 2** which summarize the results, GRO, ethylbenzene, naphthalene, and fuel oxygenates, including MTBE, were not detected in the soil vapor samples. The detected VOCs were benzene, toluene, and xylenes; trace benzene was detected at 7 micrograms per cubic meter ( $\text{ug}/\text{m}^3$ ) in sample VP-3, trace toluene was detected a 4 to 25  $\text{ug}/\text{m}^3$  in samples VP-2, VP-3, and VP-4, and trace xylenes were detected at 19  $\text{ug}/\text{m}^3$  in sample VP-2. Oxygen was reported at 9.03 to 15.8 percent (%). As described in the next paragraph, these results were acceptable.

The detected VOCs were compared to the State Water Control Board’s Low-Threat Underground Storage Tank Case Closure Policy (LTCP; SWRCB, 2012). Per the LTCP, a subsurface oxygen concentration equal to greater than 4% is considered to have a bioattenuation zone. Based on the reported oxygen concentrations at the Site, 9.03 to 15.8%, a bioattenuation zone was identified. Based on the proposed residential development, the soil vapor analytical results were compared to LTCP soil vapor criteria for residential properties with a bioattenuation zone (LTCP soil vapor criteria). As shown in **Table 1**, the reported benzene concentration of 7  $\text{ug}/\text{m}^3$  in VP-3 was well below the LTCP soil vapor criteria of 85,000  $\text{ug}/\text{m}^3$ . There are no LTCP soil vapor criteria for toluene or xylenes. Based on these results, the reported soil vapor concentrations at the Site would not pose a significant vapor intrusion risk to the future building.

As a further conservative measure, the soil vapor analytical results were also compared to the California Department of Toxic Substance Control (DTSC) Human and Ecological Risk Office Note Number 3 and EPA Regional Screening Levels for residential ambient air, modified for soil vapor using a 0.001 attenuation factor (DTSC-SLr and EPA-RSLr, respectively). When both a DTSC-SLr and EPA-RSLr are available for a given chemical, the lower value was used. These soil vapor screening levels are based on an incremental lifetime cancer risk of  $10^{-6}$  (1 in 1 million) and non-cancer hazard index of 1 as a result of exposure to a given chemical. A theoretical resident is very conservatively assumed to occupy a given residence and be exposed to a given chemical for 26 years, 360 days a year, 24 hours a day. As shown in **Table 1**, the detected soil vapor concentrations were below the soil vapor screening levels. Based on these results, the residual soil vapor concentrations beneath the future subterranean parking garage would not pose a significant vapor intrusion concern.

## CONCLUSIONS

A historical gasoline release occurred from historical fueling operations at the Site. Remediation and assessment activities indicate that the soil has been adequately remediated and gasoline constituent concentrations have been significantly reduced in groundwater. At this time, the Site is planned for redevelopment with a four-story residential building with a subterranean parking garage. Residual petroleum constituent concentrations that may be present in shallow soil will be excavated for the construction of the parking garage, and upon completion, the building and garage would limit direct soil exposure to future occupants. The groundwater beneath the Site is not planned for consumption and based on the depth, there is no direct exposure route to future occupants. The soil vapor concentrations are below regulatory screening levels for potential vapor intrusion, and the parking garage would also eliminate a direct exposure pathway to future occupants. Based on this evaluation, no significant human health risks were identified for future occupants of the proposed building. Therefore, the current environmental conditions at the Site are acceptable to move forward with the construction of the proposed building.

This evaluation has been completed by the undersigned. If you have additional questions, please contact the project manager, Alejandro Fuan, at [fuan@reynolds-group.com](mailto:fuan@reynolds-group.com) or (714) 920-9312.

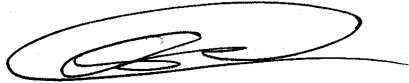
Sincerely,

**THE REYNOLDS GROUP**

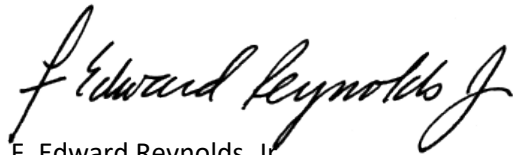
a California corporation by:



Dennis Kawasaki  
Senior Scientist



Alejandro Fuan  
CA Registered Civil Engineer #76387



F. Edward Reynolds, Jr.  
CA Registered Civil Engineer #38677



## REFERENCES

California Department of Toxic Substances Control (DTSC), 2022, Human Health Risk Assessment (HHRA) Note Number 3, DTSC-modified Screening Levels (DTSC-SLs), released June 2020, revised May 2022.

EPA, 2022, Regional Screening Level (RSL) Summary Table, dated May 2022

Los Angeles Regional Water Quality Control Board (LARWQCB), 2022, Underground Storage Tank Program – Workplan Review, Scovel Property (Former), 5600 Franklin Avenue, Los Angeles, California, letter issued to 162-166 Douglas, LLC and LV/Soto, LLC and Scovel Property, dated June 15.

State Water Resources Control Board (SWRCB), 2012, Low-Threat Underground Storage Tank Case Closure Policy, effective August 17, 2012.

The Reynolds Group (TRG), 2022a, Work Plan for Additional Assessment, Former Scovel Property, 5600 Franklin Avenue, Los Angeles, report prepared for the Los Angeles Regional Water Quality Control Board (LARWQCB), dated May 31.

\_\_\_\_\_, 2022b, First Half 2022 Semi-Annual Groundwater Monitoring Report, Former Scovel Property, 5600 Franklin Avenue, Los Angeles, report prepared for the Los Angeles Regional Water Quality Control Board (LARWQCB), dated June 30.

\_\_\_\_\_, 2022c, Additional Groundwater and Soil Vapor Assessment Report, Former Scovel Property, 5600 Franklin Avenue, Los Angeles, report prepared for the Los Angeles Regional Water Quality Control Board (LARWQCB), dated November 18.

## ATTACHMENTS

Table 1 – Soil Vapor Analytical Results – July 2022

Figure 1 – Site Location Map

Figure 2 – Site Plan with Soil Vapor Sample Results

Attachment A – Preliminary Building Plans

cc: Mr. Ilan Gorodezki, **162-166 Douglas, LLC and LV/Soto, LLC**  
Mr. Shane Parker, **Parker Environmental**

## TABLES

**TABLE 1**  
**SOIL VAPOR ANALYTICAL RESULTS - July 2022**  
**5600 FRANKLIN AVENUE**  
**LOS ANGELES, CALIFORNIA**

Soil Vapor Probe ID	Sample Date	Sample Depth (feet bgs)	Oxygen (%)	GRO (ug/m <sup>3</sup> )	VOCs (ug/m <sup>3</sup> )									
					Benzene	Toluene	Ethyl-benzene	Total Xylenes	Naphthalene	MTBE	ETBE	DIPE	TAME	TBA
VP-1	07/25/22	15	9.03	<1,000	<4	<4	<4	<8	<20	<20	<20	<20	<20	<400
VP-2	07/25/22	15	13.0	<1,000	<4	4	<4	19	<20	<20	<20	<20	<20	<400
VP-3	07/25/22	15	17.2	<1,000	7	25	<4	<8	<20	<20	<20	<20	<20	<400
VP-4	07/25/22	15	15.8	<1,000	<4	9	<4	<8	<20	<20	<20	<20	<20	<400
SWRCB Low Threat Closure Policy			See Note*	NA	85,000	NA	1,100,000	NA	93,000	NA	NA	NA	NA	NA
EPA-RSLr			NA	31,000	360	5,200,000	1,100	100,000	83	11,000	35,000	730,000	NA	5,200,000
DTSC-SLr			NA	NA	97	310,000	NA	NA	NA	NA	NA	NA	NA	NA

**Notes:**

Sample ID - soil vapor probe identification

feet bgs - feet below the ground surface

Oxygen analyzed in accordance with ASTM D1946

GRO - gasoline range organics (C<sub>4</sub>-C<sub>12</sub>)

VOCs - volatile organic compounds analyzed in accordance with EPA 8260E

% - percent

ug/m<sub>3</sub> - micrograms per cubic meter

< - no detectable concentration above the laboratory reporting limited provided

NA - not applicable / not available

SWRCB Low Threat Closure Policy - California State Water Resources Control Board Low-Threat Underground Storage Tank Case Closure Policy (LTCP) Residential Soil Gas Criteria with Bioattenuation Zon

\* Per the LTCP, an oxygen concentration equal to or greater than 4% is considered to have a Bioattenuation Zone

EPA RSLr - EPA Region 9, Regional Screening Levels for residential ambient air, dated May 2022, modified for soil vapor using a 0.001 attenuation factor

DTSC-SLr - California Department of Toxic Substances Control, Human and Ecological Risk Office Note 3, ambient air screening levels for residential land use, dated May 2022, modified for soil vapor using a 0.001 attenuation factor

MTBE - methyl tert-butyl ether

ETBE - ethyl-tert-butylether

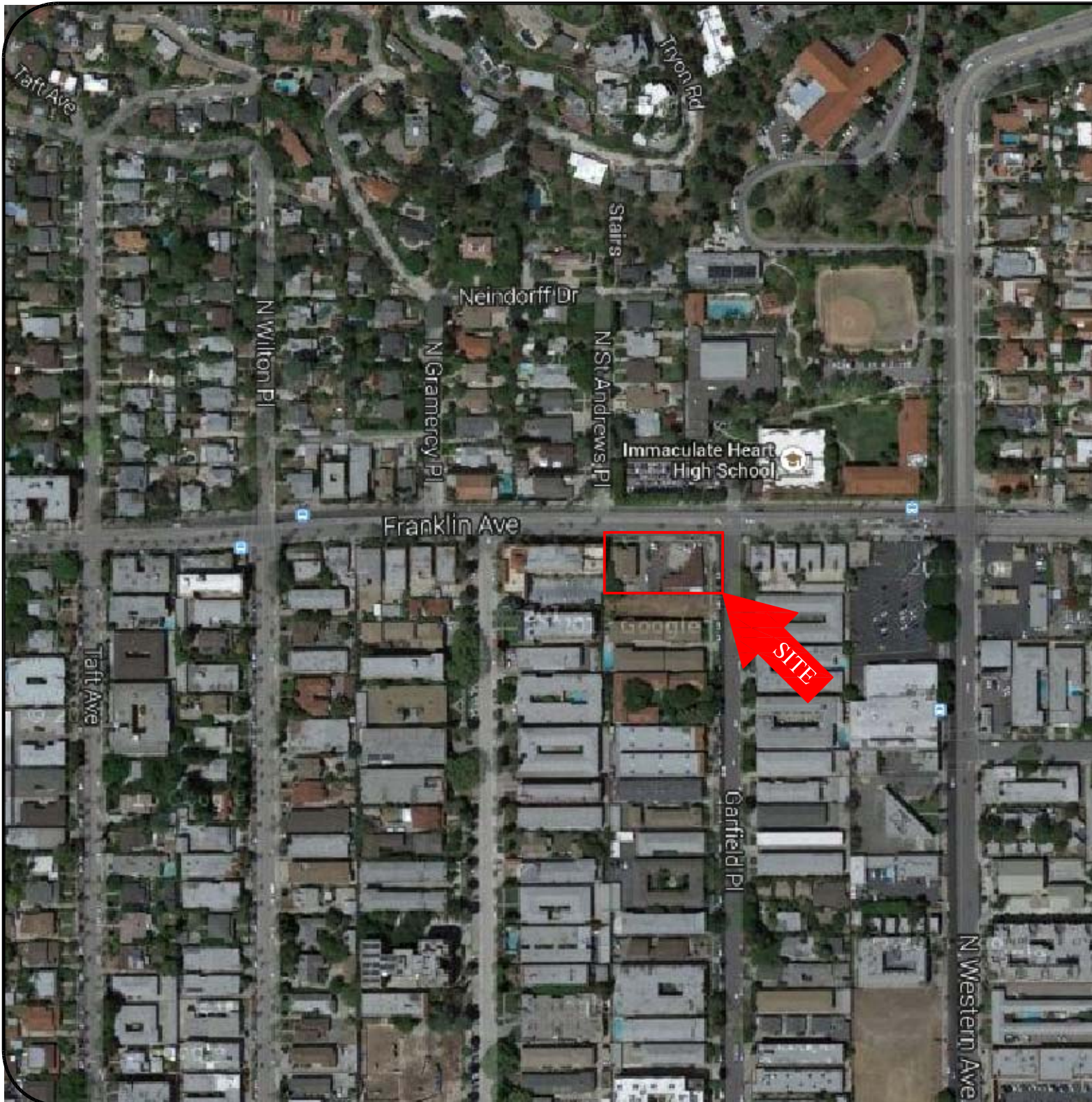
DIPE - diisopropyl ether

TAME - tert-amyl methyl ether

TBA - tert-butyl alcohol



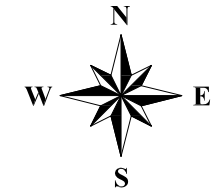
## FIGURES



#### General Notes

 - Approximate Site Boundary

\* ADAPTED FROM GOOGLE EARTH 2011



#### Project Details

<b>Name</b>	162-166 DOUGLAS LLC & LV / SOTO LLC
<b>Address</b>	5600 Franklin Ave Los Angeles, CA
<b>Number</b>	7424

#### Figure Details

SITE LOCATION MAP

<b>Figure #</b>	Figure 1
<b>Revise Date</b>	January 2020
<b>*NOT TO SCALE</b>	<b>Scale</b>

#### Company Information

<b>Address</b>	520 West 1st Street Tustin, CA 92780
<b>Telephone</b>	(714) 730-5397
<b>Fax</b>	(714) 730-6476







**ATTACHMENT A**

**PRELIMINARY BUILDING PLANS**

OWNER:  
ILAN GORODEZKI  
LV/SOTO, LLC &  
162-166 DOUGLAS, LLC  
9201 WILSHIRE BLVD. # 202  
BEVERLY HILLS, CA 90210

NOT FOR CONSTRUCTION

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF THE ARCHITECT AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH THE ARCHITECT. WRITTEN DIMENSIONS TAKE PRECEDENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF THE ARCHITECT PRIOR TO COMMENCEMENT OF ANY WORK.

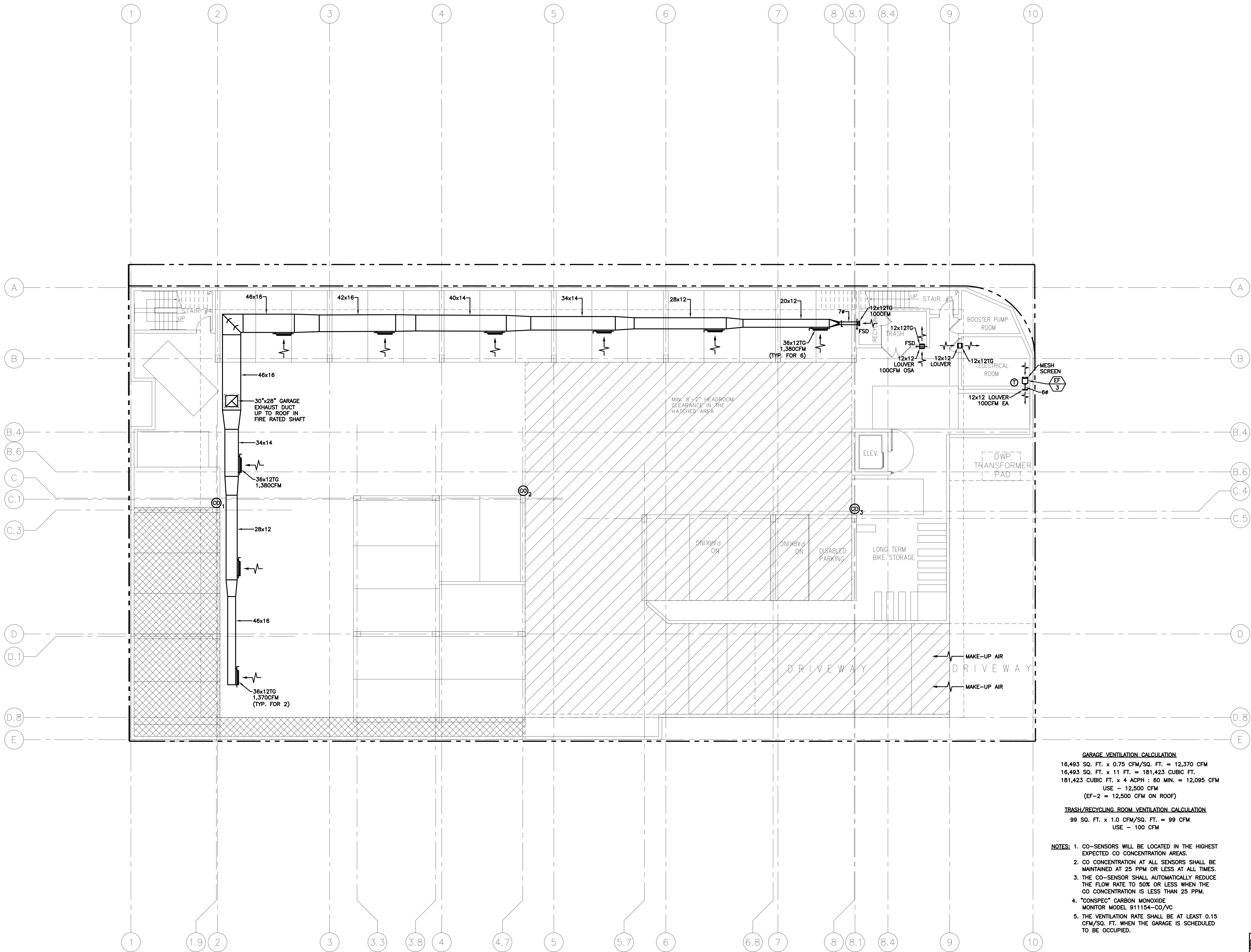
[illegible]

CHECKED BY	DATE
DRAWN BY	JOB NUMBER

SHEET TITLE	
-------------	--

GARAGE PLAN

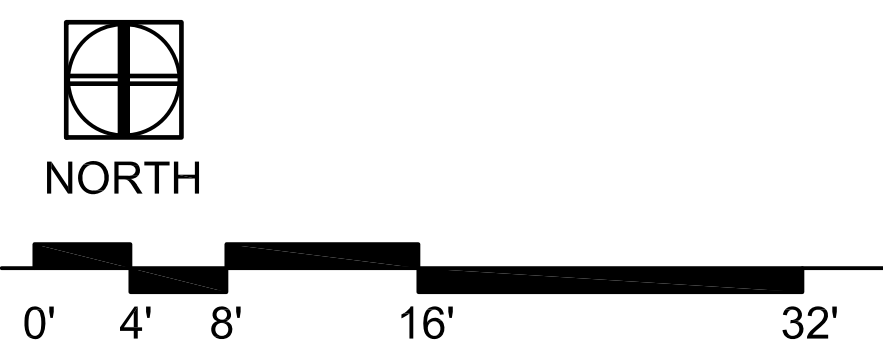
SHEET NUMBER **M1.0**



## GARAGE PLAN



SCALE: 1/8" = 1'-0"



**OWNER:**  
**ILAN GORODEZKI**  
**LV/SOTO, LLC &**  
**162-166 DOUGLAS, LLC**  
**9201 WILSHIRE BLVD. # 202**  
**BEVERLY HILLS, CA 90210**

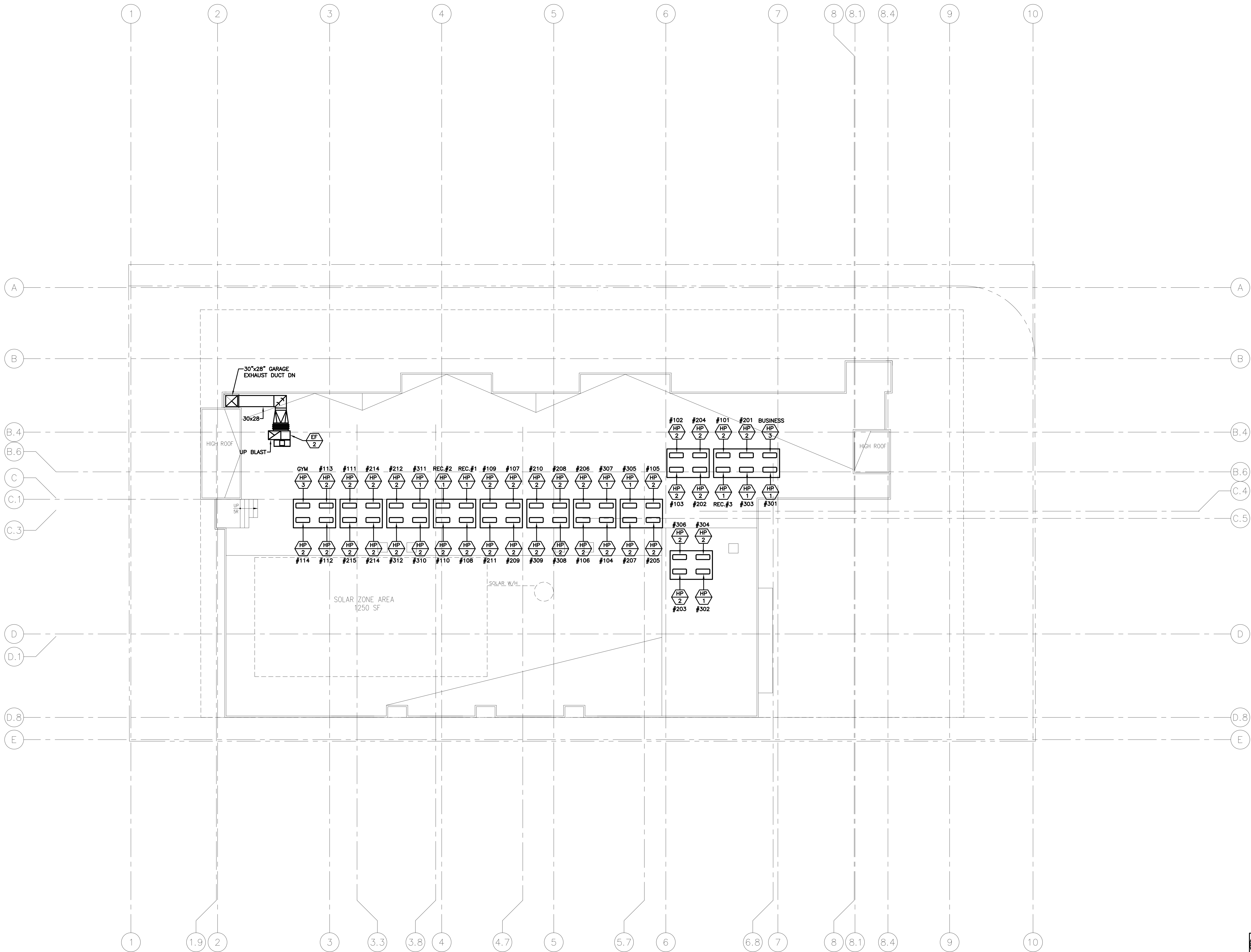
NOT FOR CONSTRUCTION

THESE DRAWINGS AND SPECIFICATIONS ARE THE PROPERTY AND COPYRIGHT OF THE ARCHITECT AND SHALL NOT BE USED ON ANY OTHER WORK EXCEPT BY AGREEMENT WITH THE ARCHITECT. WRITTEN DIMENSIONS TAKE PREFERENCE OVER SCALED DIMENSIONS AND SHALL BE VERIFIED ON THE JOB SITE. ANY DISCREPANCY SHALL BE BROUGHT TO THE NOTICE OF THE ARCHITECT PRIOR TO COMMENCEMENT OF ANY WORK.

[illegible]

CHECKED BY	DATE
DRAWN BY	JOB NUMBER

SHEET TITLE	
ROOF PLAN	
SHEET NUMBER	M1.5



ACCESSIBLE.  
BUILDING

SCALE: 1/8" = 1'-0"

