# 4100 SUNSET BOULEVARD

## Preliminary Endangerment Assessment

**Prepared for**
**City of Los Angeles**
**Department of City Planning**

**December 2020**

ESA

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# EXECUTIVE SUMMARY

This Preliminary Endangerment Assessment (PEA) has been prepared for the City of Los Angeles' Department of City Planning for the 4100 Sunset project (Project) described herein. The developer proposes to redevelop the property located at 4100 Sunset Boulevard (Site) in the City of Los Angeles and in order to facilitate the development of the property, a cumulative assessment for information regarding known hazardous materials and the potential for adverse effects on people or the environment is necessary.

The purpose of this PEA is to identify whether a release or threatened release of metals, volatile organic compounds (VOCs), and/or total petroleum hydrocarbons (TPH) exists at the Site and to evaluate the potential human health risks. Objectives of the PEA were to evaluate soil sampling data and identify chemicals of potential concern (COPCs), estimate potential future human health impacts as a result of exposure to identified COPCs, and if potential impacts exceed thresholds, provide recommendations to reduce human health impacts below thresholds. This PEA was performed in accordance with the Department of Toxic Substances Control (DTSC) PEA Guidance Manual (DTSC, 2015).

Phase I Environmental Site Assessments (ESAs; Terracon 2007, 2014) and a Phase II limited site investigation (Terracon 2008), which included soil sampling, were conducted for the Site. Sampling results from the Phase II investigation were used in order to determine if any contaminants were detected onsite. Contaminants detected in soil were compared to their respective screening levels in order to determine if the contaminant was a COPC.

The Site had residual levels of TPH in the gasoline, diesel, and motor oil range in soil. The detected levels for the various TPH fractions were determined to be below their respective screening levels. VOCs were not detected at the site. Based on this, these contaminants should not be considered COPCs and no further evaluation is necessary.

Groundwater was encountered at 35 feet below ground surface (bgs) (Terracon 2008) and has been as shallow as 20 feet bgs in the past at the Site (CDMG 1998). The proposed project would have four levels of underground parking. Therefore, construction activities are anticipated to reach groundwater. Dewatering would be implemented in accordance with all applicable regulations. The City of Los Angeles provides a summary document that lists the relevant dewatering regulations and guidelines for compliance (City of Los Angeles undated).

- Los Angeles Municipal Code (LAMC) 62.80 Drainage of Water into Streets - (a) It is unlawful for any person to drain water or other liquids or permit water or other liquids to be drained from lands or premises under such person's management or control onto any public street, or causes interference with or creates a hazard to public travel.

- LAMC 64.70.03 Elimination of Illicit Discharges and Illicit Connections - A. Prohibitions of Illicit Discharges. No person shall discharge non-storm water to the storm drain system, unless authorized by a separate or general NPDES Permit or if the discharges are exempted or conditionally exempted by the Municipal Storm Waters and Urban Runoff NPDES Permit for Los Angeles County, as provided or as subsequently amended or if granted as a special wavier or exemption by the Regional Board.

- Los Angeles Regional Water Quality Control Board (RWQCB) Order No. R4-2018-0095, General NPDES Permit No. CAG994004, Waste Discharge Requirements for Discharges of Groundwater From Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties.

From the discussion above, all contaminants detected at the Site were determined to be below their respective screening levels. Based on this, these contaminants should not be considered COPCs and would not result in human health impacts for potential future receptors. No further investigation is necessary.

# 1. Introduction

This Preliminary Endangerment Assessment (PEA) has been prepared for the City of Los Angeles' Department of City Planning for the 4100 Sunset project (Project) described herein.

## 1.1 Purpose and Objectives

The purpose of this PEA is to consolidate the information from various available reports into a PEA using guidance from the Department of Toxic Substances Control (DTSC) PEA Guidance Manual (DTSC, 2015). The objective is to facilitate the redevelopment of the properties. The focus of this effort is on information regarding known hazardous materials and the potential for adverse effects on people or the environment. The focus does not include repeating all details provided in the Phase I Environmental Site Assessments (ESAs) and Phase II limited site investigation (including soil sampling) conducted for the Site. The reader is referred to the reference documents cited herein for site details not relevant to the risk analyses provide herein.

Overall objectives of this report include the following:

- Evaluate the soil sampling data;
- Identify chemicals of potential concern (COPCs);
- Estimate the human health impacts from exposure to identified COPCs;
- Provide recommendations to reduce risk and determine if further action/investigation is needed.

## 1.2 Scope of Work

Armbruster Goldsmith & Delvac, LLP, the attorneys for the project developer, has requested the preparation of a PEA in support of redeveloping the site that comprises the 4100 Sunset project in the City of Los Angeles, California (see **Figure 1**). Phase I ESAs were conducted for the Site (Terracon 2007, 2014). Based on the results of the 2007 Phase I assessment, a Phase II limited site investigation and soil sampling was conducted to test for potential soil contamination and hazardous building materials (Terracon 2008). This existing information was used to prepare this PEA using guidance from the DTSC PEA Guidance Manual dated October 2015.

Based on the project-specific data, a Conceptual Site Model (CSM) was prepared to identify pathways that represent a potential route of human exposure. Potential human health risks were characterized by comparison to screening levels. Screening levels used were based on DTSC's Human and Ecological Risk Office (HERO) Human Health Risk Assessment (HHRA) Note 3, the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) environmental screening levels (ESLs), and United States Environmental Protection Agency (USEPA) Regional Screening Levels (RSLs).

## 1.3 Assumptions and Exclusions

It is assumed that the existing Phase I ESAs and Phase II investigation results are sufficient to support the PEA, including the human health and ecological screening evaluation, as well as such refined discussions as the Data Quality Objectives (DQOs) and rationale for sampling methodology. Also, an ecological risk assessment was not conducted as the Site is not a suitable habitat for ecological receptors.

It is assumed that public participation would occur separately through the California Environmental Quality Act (CEQA) process, in the event that a Remedial Action Plan (RAP), Removal Action Workplan (RAW), or similar document would be needed as a result of this PEA.

## 1.4 Information Provided from User/Owner/Landowner

The Project developer provided the reports cited in Chapter 12 References. These reports consist of Phase I ESAs and Phase II site investigation.

# 2. Site Description

This section describes the physical setting of the Site and its relation to surrounding areas.

## 2.1 Site Identification

The Site consists of a number of contiguous parcels. The Site and parcel information is listed below in **Table 1**. The parcels within the Site are shown on **Figure 2** in Appendix A.

**TABLE 1**
**PROJECT SITE DESCRIPTION**

| Address | APN | Current USEPA or Other Agency Identification Number, if any | Zoning | Land Use Designation |
|---|---|---|---|---|
| 4100 Sunset | | | | |
| 1071 Manzanita | 5429-002-018 | None | C2-1D | Highway Oriented Commercial |
| 1077 Manzanita | 5429-002-002 | None | | |
| 1083 Manzanita | 5429-002-003 | None | | |
| 1085, 1087, 1089 Manzanita; 4100 Sunset | 5429-002-004 | None | | |

SOURCE: City of Los Angeles, 2016

### 2.1.1 Contact Person

The main contact person and mailing address for the Project is listed below.

Mr. Dave Rand
Armbruster Goldsmith & Delvac LLP
12100 Wilshire Boulevard, Suite 1600
Los Angeles, CA 90025
(310) 209-8800

### 2.1.2 General Property Location and Description

The Site is located at the corner of Manzanita Avenue and Sunset Boulevard (see Figure 1). The Site consists of several parcels, as identified in Table 1. The Site is located within the completely developed urban area of City of Los Angeles. The Site and constituent parcels are currently entirely developed with the zoning and land use designation identified in Table 1 and shown on Figure 2. Other than minor landscaping, the properties have no natural habitat or streams. Chapter 3 provides details of current and previous uses. The Site's latitude and longitude and elevation are listed below in **Table 2**.

**TABLE 2**
**SITE LOCATION AND ELEVATIONS**

| Latitude | Longitude | Approximate Elevation (feet) |
|---|---|---|
| 34.092900 | -118.281609 | 340 (southwest portion); 360 (northeast portion) |

## 2.2 Site Geology and Hydrogeology

The regional and Site-specific geology and hydrology information summarized below is adapted from the Phase I ESAs and Phase II site investigation (Terracon 2007, 2008, 2014), along with other sources as cited.

### 2.2.1 Regional Geology

The Site is located within the western corner of the triangular Northeastern Block of the Los Angeles Basin. The Los Angeles Basin represents a transition between the Peninsular and the Transverse Range Geomorphic Provinces in Southern California. Geologic structures within the Transverse Range Province trend mostly east-west, in contrast to the prevailing northwest trend elsewhere in the state, including the Peninsular Range Province.

The active Newport Fault is approximately eight miles to the southwest of the Site and the San Jacinto Fault is about 50 miles to the east. The geology within the block consists of up to 24,000 feet of marine sedimentary rocks (Yerkes et al, 1965).

### 2.2.2 Site Geology and Hydrogeology

The Site investigation encountered approximately 10 to 30 feet of native alluvial soils beneath the asphaltic concrete pavement cover. The soils consisted of silty clays and lean to fat clays underlain by siltstone to the maximum depth explored of approximately 40-½ feet below ground surface (bgs). The borings were monitored for groundwater while drilling and immediately after completing the drilling operations. Groundwater was encountered at a depth of approximately 35 feet bgs (Terracon 2008). Based on research of other sites in this area, historical groundwater has been as shallow as 20 feet bgs (CDMG 1998).

# 3. Background

## 3.1 Site Status/Historical Site Information

The current and historical uses are summarized below by parcel, where information is available. The following information on current and historical uses at the Site are from the Phase I ESA (Terracon, 2014).

The Site is an irregular-shaped tract developed with a two-story 9,877 square foot commercial/light industrial building. At the time of the Site reconnaissance, the first floor consisted of an office/warehouse with storage and office mezzanine areas. The second floor was currently occupied by 4100 Bar, which is a lounge-type bar establishment with an office, bar, storage and walk-in refrigerator.

Based on a review of historical information, the Site has had multiple addresses and was primarily vacant land until a portion of the Site was improved with retail/commercial type development sometime in the 1920s. Since development, the Site has been occupied by the following types of businesses: various retail/commercial, refrigeration, furniture, building materials, printing equipment manufacturing, lumber, welding, and brake/muffler service. The City of Los Angeles, Department of Building and Safety records indicated a building was erected on the Site in 1923, and a market / vegetable stand was identified on the site in 1926 and 1927. Demolition of a structure on the Site was noted, with the erection of a new building in approximately 1936. In 1963, a portion of the Site was occupied by a restaurant, and a bar occupied a portion of the Site in 1969. References to an automobile repair shop occupying a structure in the northern portion of the Site was noted in 1972, 1973, 1977, and 1985. The records indicated that the automobile repair shop structure was demolished in approximately 1985.

## 3.2 Hazardous Material/Substance/Waste Management Information

The 2014 Phase I ESA indicated that the current building use (first floor: office/warehouse with storage and office mezzanine areas; second floor with lounge-type bar, office, storage and walk-in refrigerator) would be expected to use negligible volumes of hazardous materials (Terracon, 2014). Of the historical uses, the prior use as a welding shop, brake/muffler service, and automobile repair shop suggest the use of hazardous materials. A Phase II investigation was conducted in 2007 (Terracon, 2008). The results are discussed below in Section 6.1, Summary of Activities, which concluded that the detected low levels of hydrocarbons were naturally occurring, and that further sampling or remediation was not necessary.

## 3.3 Current and Historical Use(s) of Surrounding Properties

The Site is currently developed with a two-story commercial/light industrial building. Historical information indicated the types of businesses that were historically located offsite approximately 60 to 300 feet east/northeast and topographically upgradient of the Site included various

retail/commercial, automobile repair/service, a gasoline station, dry cleaners, printing manufacturing, a print press, taxidermy, automobile body shops, and manufacturing (Terracon, 2014). A Jiffy Lube was identified approximately 60 feet to the east of the Site, and was historically identified as a gasoline and/or automobile service station in the early 1900s. The 2014 Phase I ESA concluded that the historical automotive, fueling, and dry cleaning operations identified offsite and to the east/northeast of the Site do not appear to constitute RECs.

## 3.4 All Appropriate Inquiries Required Information

### 3.4.1 Fair Market Value

This PEA report determined contaminants detected at the Site (as discussed below) were below regional background concentrations and/or screening levels, and should not be considered COPCs. Based on this, property values of the Site would not be impacted and the evaluation of the relationship of the purchase price to the fair market value is not warranted.

### 3.4.2 Commonly Known or Reasonably Ascertainable Information about the Property

Phase I ESAs and the Phase II site investigation conducted for the Site included extensive reconnaissance, which included interviews of individuals with knowledge of the sites' conditions. These individuals consisted of site owners and leasing managers. Based on this, all known or reasonably ascertainable information about the properties was acquired.

### 3.4.3 Records Review Information

The relevant results of the records review were incorporated into the previous sections and are described in further detail in the Phase I ESA in Appendix B.

### 3.4.4 Site Reconnaissance

The relevant results of the site reconnaissance conducted by various consultants were incorporated into the previous sections and are described in further detail in the Phase I ESAs and Phase II site investigation in Appendix B.

### 3.4.5 Interviews

The relevant results of interviews conducted by various consultants were incorporated into the previous sections and are described in further detail in the Phase I ESA in Appendix B.

# 4. Apparent Problem

As previously discussed, historical land uses on the Site included some activities that included the use of hazardous materials. Although the prior land uses that include the substantial use of hazardous materials are no longer present, residual levels of chemicals may be present in soil and groundwater beneath the Site.

The Site had a variety of land uses that included, but was not limited to: retail/commercial shops, welding shop, printing equipment manufacturing, furniture, and automobile repair shop. Based on the 2007 Phase I ESA performed by Terracon, the Site's former use as an automobile repair shop and operations associated with repair shops represented RECs for the Site. Also, surrounding offsite land uses such as the historical automotive, fueling, and dry cleaning operations identified offsite and to the east/northeast represented possible RECs for the Site. Based on this, soil and groundwater sampling were conducted. As previously discussed, the Phase II investigation conducted in 2007 found that the historical automotive, fueling, and dry cleaning operations identified offsite and to the east/northeast of the Site do not appear to constitute RECs (Terracon 2008).

# 5. Conceptual Site Model

The Conceptual Site Model depicts the potential chemical sources present, transport mechanisms, exposure mediums, and exposure routes to potential receptors. It includes the potential sources of contaminants, such as former auto repair shops or drycleaners. For the Site, potential exposure routes to identified receptors included ingestion, dermal contact, and inhalation of dust with affected soil.

Volatile organic compounds (VOCs) were only found in trace quantities at the Site therefore the airborne pathway is limited to dust caused by wind and soil handling activities.

The nearest drinking water well is located more than 2 miles northeast from the Site (LACDPW 2018). The groundwater pathway was not evaluated due to a lack of receptors and is therefore considered an incomplete pathway.

Although there is documented recreational use along the Los Angeles River, there are no known surface water intakes present (CLA 2019). The surface water pathway was not evaluated due to a lack of receptors and is therefore considered an incomplete pathway.

## 5.1 Factors Related to Soil and Air Pathways

The Site contains a commercial/light industrial building. There are no VOCs of concern, therefore the airborne pathway is limited to dust. Although the Site is currently occupied by various type of receptors, a Resident was determined to be the most likely receptor for both the current and future use of the Site and is the most conservative receptor type for human health risk assessment. Potential exposures evaluated for soils include direct contact to soils (incidental ingestion and dermal contact) and outdoor air inhalation of fugitive dust generated by wind erosion and by soil handling activities.

## 5.2 Factors Related to Water Pathways

The Site lies in the Hollywood Subbasin within the Coastal Plain of the Los Angeles Groundwater Basin. Groundwater flow in the Hollywood Subbasin is generally westward and is mainly produced from the Pleistocene age alluvial sands and gravels at approximately 35 feet bgs (DWR 2004). The nearest drinking water well is located more than 2 miles northeast from the Site (LACDPW 2018). Based on this and the lack of receptors, groundwater is considered an incomplete pathway.

Storm water runoff from the Site enters the Los Angeles County storm drain system that ultimately discharges into the Los Angeles River (LADWP 2018). The Los Angeles River is located over 2 miles east of the Site. Storm water runoff from the Site flows south along Manzanita Street. The nearest storm drain is located 0.14 miles south of the Site. Although there is documented recreational use along the Los Angeles River, there are no known surface water intakes present (CLA 2019, LACDPW, 1996). Based on this and the lack of receptors, surface water is considered an incomplete pathway.

# 6. Sampling Activities and Results

Based upon the 2007 Phase I assessment, a Phase II limited site investigation was completed for the Site (Terracon 2008). The sampling activities and testing results are summarized below.

## 6.1 Summary of Activities

On December 26th and 27th, 2007, soil and groundwater samples were collected from five locations using a limited access hollow stem drill rig. Three of the five proposed borings reached refusal prior to encountering groundwater. Soil samples were collected at the refusal depths (B-01 at 40 feet bgs, B-04 at 15 feet bgs, and B-05 at 20 feet bgs) and analyzed for VOCs and TPH. VOCs were not detected in any of the soil samples. TPH was detected at a maximum concentration of 4.36 milligrams per kilogram (mg/kg) for TPH-gasoline, 1.63 mg/kg for TPH-diesel, and 6.48 mg/kg for TPH-motor oil. A total of two groundwater samples were collected from two of the five boring locations (B-02 at 40 feet bgs and B-03 at 40 feet bgs). Maximum groundwater concentrations were: TPH-gasoline at 88 µg/l; TPH-diesel at 444 µg/l; TPH-motor oil at 3,414 µg/l; and toluene at 4.2 µg/l. Terracon concluded that the low levels of hydrocarbons were naturally occurring due to the site's location near a designated methane zone.

## 6.2 Sample Collection

Soil and groundwater samples were obtained using a limited access hollow stem drill rig. Drilling activities were performed by a State of California licensed driller. Groundwater sampled were obtained using new disposable bailers via temporary wells constructed of new PVC piping and well screens which were 2 feet in length with 0.010-inch slots. Soil was continuously observed in order to document lithology, color, moisture content, and sensory/visual evident impairment.

Soil and groundwater samples were collected in laboratory-supplied glassware and containers with proper labeling, sealed within a resealable plastic bag and placed on ice in a cooler. The sample cooler with chain-of-custody forms were transported and submitted to a California certified analytical laboratory. Upon completion of soil sampling activities, boring holes were backfilled with a bentonite/cement mixture.

## 6.3 Discussion of Results

### *Soil Sampling*

#### Total Petroleum Hydrocarbons

TPH was detected at the three of the seven soil samples collected from the five sampling locations. TPH was differentiated between TPH-gasoline, TPH-diesel, and TPH-motor oil. ESLs for TPH-gasoline, TPH-diesel, and TPH-motor oil have been established for residential receptors at 740 mg/kg, 230 mg/kg, and 11,000 mg/kg. Maximum concentrations for TPH in soil were: TPH-gasoline at 4.36 mg/kg; TPH-diesel at 1.63 mg/kg; and TPH-motor oil at 6.48 mg/kg. The various TPH concentrations detected are well below their respective residential screening levels and therefore should not be considered a COPC. TPH results are summarized in **Table 3.**

### Volatile Organic Compounds

VOCs were not detected in any of the seven soil samples collected from five borings at the Site.

**TABLE 3**
**RESIDUAL CHEMICAL CONCENTRATIONS IN SOIL**

| Chemical | | Minimum | Maximum | Units | ESLs (mg/kg) |
|---|---|---|---|---|---|
| TPH | Gasoline Range (C6-C12) | nd (detection level not reported) | 4.36 | mg/kg | 740 |
| | Diesel Range (C13-C22) | | 1.63 | mg/kg | 230 |
| | Motor Oil Range (C23-C44) | | 6.48 | mg/kg | 11,000 |

mg/kg = milligrams per kilogram
nd = not detected above the cited reporting limit

SOURCE: Terracon, 2008

## *Groundwater Sampling*

As stated previously, groundwater and surface water were considered incomplete pathways due to a lack of receptor exposure. This section presents the groundwater sampling results for information purposes.

### Total Petroleum Hydrocarbons

TPH was detected in two groundwater samples from the Site. TPH was detected at four separate carbon ranges that include C6-C12, C13-C22, C23-C32, and C6-C44. Some concentrations of TPH as diesel were detected above the SFBRWQCB's Tier 1 ESL of 100 micrograms per liter (ug/L) and are summarized in **Table 4**. The Phase II investigation determined that samples from the Site are biased towards heavy-chain hydrocarbons, which would not be typical for a release associated with a service station since the heavy-chain hydrocarbons are not very mobile. Note that TPH as motor oil does not have an ESL. It also stated that the Site is located within approximately one mile of a methane buffer zone. Based on this, the distribution of TPH carbon chain ranges, and the absence of significant metal concentrations in groundwater (which would be suggestive of a petroleum hydrocarbon release), TPH in groundwater at the Site is considered to be naturally occurring and therefore not a COPC.

### Volatile Organic Compounds

Only toluene was detected in two groundwater samples at the Site, no other VOCs were detected. Toluene has a residential ESL of 40 ug/L. The maximum detected concentration of toluene was 4.2 ug/L. This concentration is below the ESL, therefore, toluene should not be considered a COPC.

### Metals

Barium, cobalt, molybdenum, nickel, and zinc were the only metals detected in groundwater samples. The Phase II investigation determined that the metal concentrations were below Maximum Contaminant Levels (MCL) established by the California Department of Public Health. Results of groundwater sampling are shown in **Table 4.**

**TABLE 4**
**RESIDUAL CHEMICAL CONCENTRATIONS IN GROUNDWATER**

| Chemical | Minimum | Maximum | Units |
|---|---|---|---|
| **TPH** | | | |
| Gasoline Range (C6-C12) | 68 | 87.1 | ug/L |
| Diesel Range (C13-C22) | 317 | 444 | ug/L |
| Motor Oil Range (C23-C32) | 612 | 1,773 | ug/L |
| Total Carbon Range (C6-C44) | 1,827 | 3,414 | ug/L |
| **VOCs** | | | |
| Toluene | nd (1.0) | 4.2 | ug/L |
| All other VOCs | nd (0.5 - 50) | nd (0.5 - 50) | ug/L |
| **Metals** | | | |
| Antimony | nd (0.0150) | nd (0.0150) | mg/L |
| Arsenic | nd (0.0100) | nd (0.0100) | mg/L |
| Barium | nd (0.0100) | 0.0392 | mg/L |
| Beryllium | nd (0.00100) | nd (0.00100) | mg/L |
| Cadmium | nd (0.00500) | nd (0.00500) | mg/L |
| Chromium | nd (0.00500) | nd (0.00500) | mg/L |
| Cobalt | nd (0.00500) | 0.0137 | mg/L |
| Copper | nd (0.00500) | nd (0.00500) | mg/L |
| Lead | nd (0.0100) | nd (0.0100) | mg/L |
| Mercury | nd (0.000500) | nd (0.000500) | mg/L |
| Molybdenum | nd (0.00500) | 0.212 | mg/L |
| Nickel | nd (0.00500) | 0.0225 | mg/L |
| Selenium | nd (0.0150) | nd (0.0150) | mg/L |
| Silver | nd (0.00500) | nd (0.00500) | mg/L |
| Thallium | nd (0.0150) | nd (0.0150) | mg/L |
| Vanadium | nd (0.00500) | nd (0.00500) | mg/L |
| Zinc | nd (0.0100) | 0.119 | mg/L |

mg/kg = milligrams per kilogram
ug/kg = micrograms per kilogram
nd = not detected above the cited reporting limit

SOURCE: Terracon, 2008

# 7. Human Health Screening Evaluation

## 7.1 Risk Characterization Summary

Based on the results of Phase I ESAs and Phase II site investigation conducted for the Site, COPCs were not identified at any of the sites and a human health screening evaluation was not warranted.

# 8. Ecological Screening Evaluation

## 8.1 Biological Characterization

The Site is proposed for residential and commercial development. The proposed development would not maintain or be suitable for wildlife habitat.

## 8.2 Ecological Pathway Assessment

The Site would not have significant amounts of wildlife based on the proposed development, therefore, an assessment of potential exposure to sensitive ecological receptors is unnecessary.

## 8.3 Ecological Screening Evaluation Summary

Based on the development being located in a highly urbanized area that is highly disturbed, the proposed land uses would not support or be suitable for wildlife, therefore, an ecological screening evaluation was not conducted.

# 9. Community Profile

It is assumed that further public participation would occur separately through the CEQA process, in the event that a RAP, RAW, or similar document would be needed as a result of this PEA.

# 10. Environmental Professional Opinion, Conclusions, and Recommendations

## 11.1 Summary Opinion and Conclusions

Levels of TPH-gasoline, TPH-diesel, and TPH-motor oil found in onsite soil were determined to be below their respective residential screening levels. Detected VOCs were below their respective ESLs. Although groundwater concentrations of TPH-diesel were above screening levels, it is likely due to naturally occurring TPH. Based on this, these contaminants should not be considered COPCs and would not result in human health impacts for potential future receptors. No further investigation is necessary.

## 11.2 Recommendations

Based on the above-stated conclusion that the testing results indicate no human health impacts for potential future receptors, no special soil management procedures are required. In the event that construction extends to groundwater at about 35 feet below grade, groundwater removed for dewatering purposes, if any, would have to be managed in accordance with all applicable federal, state, and local disposal practices.

## 11.3 Data Gaps

No data gaps were identified.

# 12. References


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# 13. Signatures and Qualifications of Environmental Professionals

This section includes qualification statements of the environmental professionals responsible for conducting the PEA.

Mr. Michael Burns, PG, CEG, CHG, of ESA conducted the Phase 1 Environmental Site Assessment portion of this PEA. Mr. Burns has over 30 years of experience in environmental site investigations, characterizations, and assessments, including Phase I Environmental Site Assessments.

Ms. Heidi Rous, CPP, of ESA conducted the Risk Assessment portion of this PEA. Ms. Rous has over 25 years of experience in conducting Risk Assessments.

Mr. Burns and Ms. Rous declare that, to the best of their professional knowledge and belief, they meet the definition of Environmental Professional as defined in 40 CFR §312.10. 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 40 CFR Part 312.

Geologist:

_____ December , 2020

Michael G. Burns, PG #4532, CEG #1846, CHG #280

Risk Assessor:

_____ December , 2020

Heidi Rous, CPP