October 21, 2022

Via E-Mail

Councilmember Marqueece Harris-Dawson, Chair
Planning and Land Use Management Committee
c/o Candy Rosales, City Clerk
200 North Spring Street
Los Angeles, California 90012
clerk.plumcommittee@lacity.org
candy.rosales@lacity.org

RE: CF-22-0652 - 2345 S. Santa Fe Avenue, Los Angeles, CA 90058
Case No: ENV-2019-7193-CE-2A; Related Case No: ZA 2019-7192-ZAD-1A

Honorable Councilmember Harris-Dawson and Members of the Planning and Land Use Committee:

Three6ixty represents the Applicant, **Art Colony Property LLC** ("Applicant"), and owner of the property located at **2349 S. Santa Fe Avenue, Los Angeles, CA 90058** ("Project Site") that is the subject of Case Number **ENV-2019-7193-CE-2A** and related Case No:. **ZA 2019-7192-ZAD-1A**

On June 10, 2021, the Associate Zoning Administrator ("ZA") issued a Letter of Determination ("LOD") approving a Zoning Administrator's Determination ("ZAD") allowing for the conversion of, and a 3,672- square-foot addition to, an existing 20,200 square-foot warehouse building for 18 Joint Living and Work Quarters for artists and artisans within the M3-1-RIO Zone ("Project").

The Santa Fe Art Colony Tenants Association, Inc. ("SFACTA") and David and Damien Odell ("Odells") appealed the LOD to the Central Area Planning Commission ("CAPC") (collectively, the "Appeals"). These appeals were categorically denied by the Central Area Planning Commission ("CAPC") at their public hearing on April 12, 2022, upholding the decision of the Zoning Administrator in approving the LOD and the corresponding Categorical Exemption ("CE") for the Project. The ZA Approval was not further appealable, and the action became final.

Subsequently, on May 20, 2022, the CE was appealed by the Concerned Citizens for Santa Fe Arts Colony, represented by attorney Jamie Hall of Channel Law Group. The appeal does not present any information that has not already been exhaustively vetted by the CAPC, and there is no need for any reconsideration of the CAPC decision with respect to the CE by the Planning and Land Use Committee. The appeal issues were thoroughly responded to in an applicant submission to the CAPC on March 15, 2022, attached hereto as Attachment "A".

As set forth in the initial appeal response, and as further demonstrated herein, the Appeals are without merit and clearly fail to meet their burden to demonstrate that the ZA or

the CAPC erred or abused their respective discretion in approving the Project and denying the prior appeals. As such, you should deny the Appeals in full and sustain the prior actions affirming that the Project is exempt from CEQA per Class 32, and there is no substantial evidence demonstrating that an exception to a categorical exemption applies.

1. **A Class 32 Categorical Exemption is Fully Supported by Findings.**

The affordable housing requirement under the original approvals was satisfied years ago. The Appellants claim that the Class 32 Categorical Exemption is inappropriate because the finding that "the Project is consistent with the applicable general plan designation and zoning regulations lacks foundation because the Project fails to ensure compliance with prior approvals requiring an affordable set-aside."

Appellants reference to the original 1986 approval as legally requiring low and moderate rents for the newly converted units, ignores the fact that those requirements were satisfied years ago. There were, in fact, thirty-year affordability covenants imposed upon 43 of the 57 units in the complex. However those covenants have long since expired, a court has rejected the tenants claims regarding the Applicant's inability to charge market rents, and there is no requirement in the previous approval that new covenants be imposed on any future conversion. Moreover, the original restrictions were imposed as express consideration for a loan from the Community Redevelopment Agency, that has since been terminated – See Attachment "B", Covenant Termination. There is no public money involved in this proposed conversion and no other applicable City requirement that would mandate that the artists-in residence units be covenanted as affordable housing.

The Applicant is not seeking any discretionary approval that creates a legal nexus for the City of Los Angeles to require the provision of on- or off-site affordable units. The process for converting industrial buildings to artist in residence units does not include any affordability requirement, not does the Project utilize any affordable housing incentive programs such as a State Density Bonus (SB 1818/AB 1763), or the City's Transit Oriented Communities Program. The Applicant is seeking no deviations from the municipal code with regard to density floor area, height, setbacks, or other development standard necessary to accommodate 18 live-work units on-site. Therefore, as cited earlier, there is no legal nexus for the City to require affordable housing on-site.

Notwithstanding assertions by the Appellants, there is no displacement of tenants at all here – this is the last of the 5 buildings to be converted and the units would be additive to the existing community and supply of live/work units. Furthermore, in accordance with LAMC Section 12.24.X.13, and all units will necessarily be restricted to artists.

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The Project meets all zoning requirements including parking. Despite Appellants' assertions that more parking is required, the previous project approvals do not require a minimum of 75 parking spaces for the existing 57 units. The same 75 spaces have been noted as being provided, since the first approval, notwithstanding subsequent approval of additional units. The reference to 75 spaces is descriptive, not a mandate that a minimum of 75 spaces be required for the 57 units. Indeed the Certificates of Occupancy that were issued for the original units reflect a parking requirement of one space per unit (See Attachment "C", Certificates of Occupancy). The current project is providing new parking to meet its code requirements and thus there is no violation of any LAMC provisions for parking, nor any prior approvals on the Property.

There is no basis for the CAPC to determine that the environmental clearance for the project was issued in error due to a claim about insufficient parking, and thus no basis to grant an appeal based on such a finding.

There has been no "piecemealing" of the Project. Appellants argue that the Project is disqualified from using a Class 32 exemption because "the Project and *successive* related projects would result in cumulative impacts" (emphasis added). Specifically, Appellants argue that the warehouse conversion into artist lofts has been "piecemealed" into four separate discretionary approvals to circumvent environmental review.

To be clear, piecemealing only applies when a larger project is chopped up into a series of approvals to avoid analysis of the total project impacts. Here, the original warehouse conversion of 53-units was approved almost 40 years ago, in 1986. It is true that over time there have been subsequent discretionary approvals, bringing the total number of approved units up to 57, but they have been issued as the warehouse uses have been converted to artist uses overtime; not to circumvent CEQA review, but as a reflection of the gradual elimination of obsolete industrial uses. Each subsequent action had valid CEQA review to analyze the prior project actions at that time.

Moreover, there has been no permit issued for a conversion for more than eight years. And, that permit was issued to legalize a unit that had already been converted many years ago. Thus the additional projects Appellants cite are not "successive" but clearly "previous". Decades after the original conversions, the Applicant seeks to convert the last warehouse on the property (built in 1953) because it is no longer viable for use as a warehouse, <u>not</u> to avoid analysis of impacts that occurred in the 1980's. The Project is not resulting in 75 new joint live work quarters, as the Appellants argue, because that argument ignores the 57 units that have existed for decades. The Project only involves the 18 units that would be located in the 1953 warehouse that is the subject of this conversion.

There are no unusual circumstances. The other exception cited by the appellants is that there are unusual circumstances due to the incompatibility with industrial uses including recycling plants immediately to the west of the project site. However, industrial uses bordered the property long before the original conversions in the 1980s. CEQA is meant to analyze the impact of the project on the environment, not the impact of the environment on the project.

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The zoning code under Section 12.24.X.13 specifically allows the specialized artist-in-residence type uses in industrial zones, in recognition of the occupants' needs to utilize chemicals, welding apparatus, and other similar semi industrial processes in making their art. These types of units are only permitted industrial zones in recognition of their unique use. Thus, they cannot be disqualified from using a categorical exemption which recognizes the fact that they comply with applicable zoning requirements, on the grounds that there are unique circumstances, when those circumstances are the circumstances exactly contemplated by the zoning regulations.

Similarly, Appellants have raised a related concern that it is not safe to have residential uses added to the complex, because of the harmful impacts of chemicals from adjacent properties, and this makes a categorical exemption improper (notwithstanding the fact that Appellants themselves were residing in the complex until very recently, when they left after not paying rent). Prior to June 2018, and before Applicant purchased the Project Site, environmental sampling showed potential impacts to the Project Site from subsurface contamination. To address these potential impacts, Applicant installed a sub-slab depressurization system under the Project Site that has operated continuously from April 2019 to the present. The purpose of this system is to create a vacuum that will intercept VOC vapors that might be migrating upwards through the soil so they do not enter the building. This system has undergone periodic testing to confirm it is performing as intended. The results of these assessments were published in a July 21, 2022 Sub-Slab Depressurization System Performance Report by AEI Consultants, which has been provided to the Regional Water Quality Control Board (see Attachment D, Additional Environmental Documentation).

The results of vacuum measurements in 2020 and 2022 showed that the system was creating a vacuum within US EPA's recommended range to mitigate potential vapor intrusion. Moreover, based on the results of indoor air testing of vacant units in July 2022, AEI Consultant confirmed that the system was protecting residents from vapor intrusion from the subsurface into indoor air. Importantly, specifically with respect to the warehouse building, indoor air samples were consistently below the commercial and residential environmental screening levels Thus, the data does not support the concerns expressed in the appeal.

The complex has operated as a very successful artist-in-residence colony for almost 40 years. This application seeks to build out the remainder of the colony, by converting a warehouse that is no longer useful for industrial purposes. The project fully complies with the requirements for a Class 32 categorical exemption, and all of the facts in record demonstrate that have been gathered to date demonstrate the new units can be located within the industrial area to accommodate the needs of the artists, without incompatibility to the neighboring uses or detriment to the residents.

The Project is not Causing Gentrification. And a Class 32 Exemption Does not Require Analysis of Potential Gentrification Impacts. No residents are being displaced and there is no gentrification. The project is an industrial loft conversion (just like in 1986) and the supply of artist units is being increased. The Appellants' claim of accelerated gentrification is undermined by the fact that the Applicant is trying to create the exact type of housing that the Appellants

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resided in for many years, without apparent harm to the neighborhood. The units will all be restricted to Artists-in-Residence, consistent with the zoning code and applicable regulations.

Moreover, a Class 32 Categorical exception does not require a "gentrification" analysis. Per the City's CEQA policies, the Class 32 "Infill" Categorical Exemption (CEQA Guideline Section 15332), "exempts infill development within urbanized areas if it meets certain criteria. The class consists of environmentally benign infill projects that are consistent with the General Plan and Zoning requirements. … This exemption is not limited to any use type and may apply to residential, commercial, industrial, public facility, and/or mixed-use projects."

The environmental analysis that Appellant's apparently seek is neither required, nor indeed permitted, under CEQA. The fact that the Art Colony has existed and thrived for several decades, and continues to be a vibrant, safe, and healthy place to live and work, is itself substantial evidence that a Class 32 exemption is appropriate.

2. **<u>The Record Fully Supports the Required Findings for Project Approval.</u>**

The proposed Project is part of an existing 57-unit Artist-in-Residence complex known as the Santa Fe Art Colony (the "Art Colony"). The ZA Approval on appeal, allows for the fifth and final industrial building in the complex to be adaptively reused into "Joint Living / Work Quarters for Artists and Artisans," consistent with the other four buildings which have already been approved for "Artist in Residence" use by the City of Los Angeles.

The Art Colony was originally built out between 1916 and 1924 to house the C.B. Van Vorst Furniture Manufacturing Company. The Property remained in use as a factory for seventy years (1916-1986) and was subsequently converted into live-work artist lofts in 1988. As an "Artist in Residence" use, the converted units are subject to unique standards in the municipal code under LAMC Section 12.24.X.13, and remain industrially zoned properties, not residential properties. The Municipal Code under Section 12.24.X.13 specifically restricts the location of live/work for artists uses to industrial and commercial/mixed use zones, and only within existing buildings/warehouses which can demonstrate that the structures are no longer suitable for viable industrial use. There are no residents being displaced by this Project, and the Project will allow the conversion of a warehouse that no longer meets modern industrial requirements into an additional supply of Artist in Residence units, similar to the original conversion approved in 1986. The findings in the record support the ZA's determination that the 5th warehouse on site can be converted into joint live-work artist and artisan quarters, and thus the appeal should be denied.

The ZA appropriately made specific findings prior to permitting joint live-work quarters for artists and artisans, as required by LAMC Section 12.24.X.13. These findings include: (1) that adjacent uses will not be detrimental to health, safety, and welfare of future tenants; and (2) that the project will not displace viable industrial uses. The evidence in the record fully supports both findings.

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Notwithstanding the fact that existing 57 units have been successfully occupied by tenants since 1988, the Appellants assert that the new live/work units created by the warehouse conversion will be negatively impacted by the surrounding industrial uses, and therefore the ZA erred.

As noted in the LOD, page 9, all properties surrounding the site are zoned M3-1-RIO, designated for heavy manufacturing land uses, and are all improved with one-and two-story warehouse and industrial buildings, except for the abutting site to the west, which is a concrete recycling facility. The adjacent concrete plant and other industrial uses have been there for decades before the Art Colony was even established. The existing warehouse that is proposed to be converted is set back approximately 73 feet from the westerly property line, and there is a 30-foot wide abandoned railroad spur that sits between the Property and the recycling center property to the west. Therefore, there is over a 100-foot buffer between the Project and the most intensive industrial use within the vicinity. The industrial uses surrounding the Project remain viable and active, and compatible with the Art Colony.

CONCLUSION

The case file includes comprehensive documentation and extensive technical analysis to support the determination by the ZA. The record is replete with evidence supporting the ZA's conclusion that live/work uses can successfully be located at the Art Colony, and that the Categorical Exemption for the Project is appropriate. Therefore, we respectfully request again that you deny the appeals to the Project and uphold the prior decisions of the Zoning Administrator and the Central Area Planning Commission that the Categorical Exemption is supported by substantial evidence.

Sincerely,

Dana A. Sayles, AICP
Applicant Representative

Cc: Emma Howard, Planning Deputy, CD 14
Jonathan Hershey, Associate Zoning Administrator
Rogelio Navar, Fifteen Group
Amy Forbes, Gibson, Dunn & Crutcher LLP

ATTACHMENTS:

A – March 15 Applicant Appeal Response
B – CRA Covenant Termination
C – Original Certificates of Occupancy
D - Additional Environmental Documentation

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ATTACHMENT A

MARCH 15, 2022 – APPLICANT APPEAL RESPONSE TO CAPC

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March 15, 2022

Via E-Mail

Ms. Ilissa Gold, President
Members of the Central Los Angeles Area Planning Commission
200 N. Spring Street
Los Angeles, California 90012

Etta Armstrong, Commission Executive Assistant
apccentral@lacity.org
(213) 978-1128

RE: 2345-2421 S. Santa Fe Avenue, Los Angeles, CA 90058
Case No: ZA 2019-7192-ZAD-1A; Related Case No: ENV-2019-7193-CE

Dear President Gold and Members of the Central Los Angeles Area Planning Commission:

Three6ixty represents the Applicant, **Art Colony Property LLC** ("Applicant"), and owner of the property located at **2349 S. Santa Fe Avenue, Los Angeles, CA 90058** ("Project Site") that is the subject of Case Number **ZA 2019-7192-ZAD-1A** and related CEQA Case No: **ENV-2019-7193-CE**.

On June 10, 2021, the Associate Zoning Administrator ("ZA") issued a Letter of Determination ("LOD") approving a Zoning Administrator's Determination ("ZA Approval") allowing for the conversion of, and a 3,672- square-foot addition to, an existing 20,200 square-foot warehouse building for 18 Joint Living and Work Quarters for artists and artisans within the M3-1-RIO Zone ("Project"). The Project is exempt from CEQA per Class 32, and there is no substantial evidence demonstrating that an exception to a categorical exemption applies.

The Santa Fe Art Colony Tenants Association, Inc. ("SFACTA") and David and Damien Odell ("Odells") appealed the LOD (collectively, the "Appeals"). As set forth below, the Appeals are without merit and clearly fail to meet their burden to demonstrate that the ZA erred or abused its discretion in approving the Project. As such, the Central Los Angeles Area Planning Commission ("APC") should deny the appeals in full and sustain the ZA's determination for the Project.

The proposed Project is part of an existing 57-unit Artist-in-Residence complex known as the Santa Fe Art Colony (the "Art Colony"). The ZA Approval on appeal, allows for the fifth and final industrial building in the complex to be adaptively reused into "Joint Living / Work Quarters for Artists and Artisans," consistent with the other four buildings which have already been approved for "Artist in Residence" use by the City of Los Angeles.

The Art Colony was originally built out between 1916 and 1924 to house the C.B. Van Vorst Furniture Manufacturing Company. The Property remained in use as a factory for seventy years (1916-1986) and was subsequently converted into live-work artist lofts in 1988. As an "Artist in Residence" use, the converted units are subject to unique standards in the municipal code under LAMC Section 12.24.X.13, and remain industrially zoned properties, not residential properties. The Municipal Code under Section 12.24.X.13 specifically restricts the location of live/work for artists uses to industrial and commercial/mixed use zones, and only within existing buildings/warehouses which can demonstrate that the structures are no longer suitable for viable industrial use. There are no residents being displaced by this Project, and the Project will allow the conversion of a warehouse that no longer meets modern industrial requirements into an additional supply of Artist in Residence units, similar to the original conversion approved in 1986. The findings in the record support the ZA's determination that the 5th warehouse on site can be converted into joint live-work artist and artisan quarters, and thus the appeal should be denied.

The specific points raised by the appeals are addressed below:

1. **<u>The Cultural Heritage Commission Did NOT Need to Review the Project, Because Cultural Heritage Commission Staff, acting pursuant to the Commission's 2005 delegation of authority, Reviewed and Approved the Proposed Physical Alterations to the Warehouse Building and the Project Meets the Secretary of the Interior's Standards for Rehabilitation.</u>**

The Appellants claim that the ZA approval was improper because the proposed changes to the building were not "referred" to the Cultural Heritage Commission ("CHC") as required by Sec. 22.171.14 of the Administrative Code, and were only reviewed by staff. In fact the staff review was fully authorized through authority granted by the CHC to staff in the Office of Historic Resources ("OHR"). Staff's conclusion that the warehouse modifications meet the Secretary of the Interior's Standards for Rehabilitation is well supported. Appellants offer no expert evidence to the contrary, just their bare speculation.

The Applicant submitted an Impacts Analysis Memorandum prepared by Historic Resources Group (HRG), in December 2020, analyzing the proposed changes to the warehouse. The memorandum evaluated the proposed rehabilitation using the Secretary of the Interior's Standards for Rehabilitation. HRG determined that <u>the proposed rehabilitation will meet the Standards</u>, and the historic significance of the C.B. Van Vorst Co. Manufacturing Plant/Santa Fe Art Colony will be maintained after implementation of the proposed rehabilitation. That report was reviewed and concurred in by Cultural Heritage Committee Architect, Lambert Giessinger. (LOD page 9). There was no need to submit the report to the Commission because Mr. Giessinger had sufficient authority pursuant to a Resolution adopted by the CHC in 2005 allowing the delegation of authority to Director of Planning or designee acting on behalf of the Cultural Heritage Commission to approve plans for the alteration or addition of Historic-Cultural Monuments that meet the Secretary of the Interior's Standards so as to avoid unnecessary referrals of plan approvals to the Cultural Heritage Commission. (See Resolution, attached as Exhibit A).

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As part of our process, the Applicant also vetted the project extensively over the period of several months with Mr. Adrian Fine of the LA Conservancy to refine the conversion proposal that was ultimately blessed by the Office of Historic Resources and CHC. It is not surprising that CHC staff found the conversion consistent with the Standards, because the original 1986 industrial to live/work unit conversions were found consistent with the Standards, when the historic resource designation application for the Art Colony was reviewed by the CHC in 2019. At that time the Applicant had indicated its plans to adaptively reuse the warehouse and at least one Commissioner openly expressed an opinion that the required modifications to create additional artist in residence units could be accomplished notwithstanding the designation.

The ZA accordingly did not err by not requiring CHC review of the plans.

2. <u>The Record Fully Supports the Required Findings for Project Approval.</u>

The ZA appropriately made specific findings prior to permitting joint live-work quarters for artists and artisans, as required by LAMC Section 12.24.X.13. These findings include: (1) that adjacent uses will not be detrimental to health, safety, and welfare of future tenants; and (2) that the project will not displace viable industrial uses. The evidence in the record fully supports both findings.

a) ***Objective Evidence Demonstrates that The Project's Location Will Not Impact the Health, Safety and Welfare of Prospective Tenants, And Current Tenants have Lived On-Site for Decades Without Detrimental Effects***

Notwithstanding the fact that existing 57 units have been successfully occupied by tenants since 1988, the Appellants assert that the <u>new</u> live/work units created by the warehouse conversion will be negatively impacted by the surrounding industrial uses, and therefore the ZA erred. *("Dust and contaminants from the concrete facility consistently blow onto the Project Site, impacting the residents who currently reside on the property. The Applicant provided no information addressing how the dust and contaminants would be addressed for existing residents during construction, and for future residents upon Project completion."*)

As noted in the LOD, page 9, all properties surrounding the site are zoned M3-1-RIO, designated for heavy manufacturing land uses, and are all improved with one-and two-story warehouse and industrial buildings, except for the abutting site to the west, which is a concrete recycling facility. The adjacent concrete plant and other industrial uses have been there for decades before the Art Colony was even established. The existing warehouse that is proposed to be converted is set back approximately 73 feet from the westerly property line, and there is a 30-foot wide abandoned railroad spur that sits between the Property and the recycling center property to the west. Therefore, there is over a 100-foot buffer between the Project and the most intensive industrial use within the vicinity. The industrial uses surrounding the Project remain viable and active, and compatible with the Art Colony.

Moreover, as part of the ZA Approval process, the Applicant voluntarily conducted an Air Quality and Health Risk Assessment prepared by Urban Crossroads, dated July 16, 2020, that

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evaluated non-carcinogenic exposures and potential cancer and non-cancer risks due to its location in an industrial area and adjacent to a concrete recycling use, located west of the property, and the analysis concludes the health risks were less than significant. (LOD page 9).

Similarly, the Appeals complain of potential hazardous materials that exist at the Property. However, the materials they refer to were identified in 2017, and Appellants neglect to point out that after purchasing the Property in 2018, current ownership undertook further study which concluded that the source was from an adjacent property. The current ownership installed a soil vapor extraction and treatment system, that continues to be operated, maintained, monitored, and adjusted for optimal performance to mitigate any potential indoor air impact. (See Phase I attached as Exhibit B.) Recent reports demonstrate that the system is functioning as expected and therefore the impacts from any adjacent contamination have been mitigated and the site is in better condition that it was for the many years the Appellants occupied the Property prior to the change in ownership in 2018.

The same Appellants who are complaining of potential impacts have also enjoyed living in the Art Colony for many years without ill effects. Despite this fact, they insist that adverse impacts should preclude new joint living / work quarters for artists and artisans, although they want to stay in their own units on site. The record is replete with evidence supporting the ZA's conclusion that live/work uses can successfully be located at the Art Colony, and thus it is appropriate to permit conversion of the last remaining warehouse on site, which itself has become obsolete for industrial use.

b) The Project Will not Displace a Viable Industrial Use

The Appellants assert that the Project will displace a viable industrial use, because the "*continued presence [of the existing warehouse tenant] through the COVID-19 pandemic demonstrates that the warehouse is viable for smaller industrial operations and, potentially, other tenants. Further, the warehouse utility analysis from DAUM Commercial Real Estate Service was not provided to the public, and it is unclear that the analysis addressed the types of industrial operations that should be considered for a historic warehouse of this size*."

The current tenant of the warehouse prepared and sent a letter to the Department of City Planning dated May 19, 2021, stating that "*I do not believe the conversion is displacing our business, but rather the changing requirements of warehouse users. And this conversion will not lessen the likelihood that the property will be available in the future for industrial uses. Rather the approval adjacent residential uses years ago, the changes in access brought about by the Alameda Corridor improvements, and the designation of the warehouse as historic, are the driving forces in limiting the availability of the warehouse for modern industrial usage*." (See letter from Suns Trading, attached as Exhibit C).

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Since the ZA approval was issued, that tenant has actually vacated the warehouse premises, leaving the building vacant, further supporting the notion that the Appellants assumption of continued operation has proved false. Moreover, as indicated by the tenant and the letter from DAUM Commercial Real Estate Service (LOD page 9), changing market forces and modern-day requirements for industrial uses continue to impact the viability of the warehouse for new industrial uses, not the Project.

For various economic reasons, along with the demands of the industrial sector, manufacturing jobs and uses are relocating away from the downtown area of Los Angeles. Consequently, many of the buildings in the area are being occupied by non-traditional manufacturing uses if they are occupied at all. The demand for industrial property in Los Angeles has evolved towards larger parcels of land with newer improvements within greater floor space, and more modern and efficient interior design, including much higher ceilings to accommodate the equipment internal to the warehouses necessary for shipping, receiving, box stacking, and manufacturing equipment. Older warehouses were originally constructed as one-story buildings approximately 16-20 feet in ceiling height, but now most modern warehouses are built with 20-30-foot ceilings, (some as high as 40 feet), where the internal clearance accommodates modern equipment, and sometimes internal mezzanines necessary for support operations. (See Article from Meybohm Commercial, attached as Exhibit D).

New high-tech distribution and inventory systems are changing how warehouses are used, and even how space in them is described (Amazon for example has been considering using cubic feet—instead of square feet—to measure warehouse footprint). As a series of small buildings – four of which have been used as Artist in Residence quarters for the past 10-30 years, the Art Colony is no longer optimal for ongoing industrial operations.

The current warehouse tenant has elected to voluntarily vacate the premises due to the outdated nature of the existing warehouse facilities, not because of the proposed Project conversion request. The outdated industrial infrastructure of the warehouse and lack of modern conveniences inhibits its ability to function as an efficient industrial property, and the remaining warehouse building is now a standalone remnant of its industrial past. The ability to retrofit the warehouse with adequate space and clearance requirements is even more difficult given the identity of the Property as a Historic Cultural monument, thus it will be significantly more difficult for ownership to proceed to make the necessary industrial upgrades to bring the warehouse to modern standards for light industrial warehouse uses, and changing out the windows and ceiling would be cost prohibitive.

Here are some of the reasons why the existing space is not viable for modern light industrial tenants:

(1) **Design:** The warehouse is not a rectangular shaped building, as is standard in modern industrial developments, and as such the tenant loses usable warehouse space and operational efficiencies from an irregular shaped building.

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(2) **Location:** Delivery drivers are inhibited by the narrow driveways and adjacent tenant parking, which causes various operational difficulties. Truck drivers and customers are often disoriented or lost upon searching for the warehouse entrance given the location in the rear of the larger residential Art Colony. See immediately below for a depiction of the warehouse, outlined in red, entry point for the driveway (marked with a red "X"), and the Google Maps address location.

(3) **Windows/Sun Exposure:** The warehouse has large windows in the warehouse area that are not optimal for storing goods and materials, as the sun exposure damages merchandise.

(4) **Limited Power Loads:** The warehouse as currently wired can offer only limited power load capacity which is insufficient to operate the activities of the tenant.

Other cited concerns are that there is no dedicated parking for the warehouse use, as all of the on-site parking is allocated toward the residential tenants. Any limited space they utilize is shared with the adjacent artist studios and there is no street parking available adjacent to the Property. In addition, due to the inefficient parking layouts on site, truck access and truck turning radii are restricted and prevent larger standard 18-wheel trucks on-site.

The artist-in-residence uses on the property in the remaining 4 buildings were approved more than thirty years ago when the City previously determined that the conversion was appropriate and did not displace a viable industrial use. Potential conflicts with predominant existing residential uses makes continuing and future industrial uses problematic - noise, hours of operation, coordination to accommodate trucks. This Project does not lessen the likelihood the Property could be utilized for future industrial purposes; past approvals, building characteristics, and the decision to declare the warehouse historic have already made that outcome unlikely.

For the reasons discussed above, including the current industrial tenant's and industrial broker's assessment of the modern deficiencies of the warehouse building, the conversion into artist-in-residence units will not displace a viable industrial use at the site. It is inevitable and only practical that the warehouse be converted to live-work units to create a cohesive and seamlessly integrated artist-in-residence community.

3. **A Class 32 Categorical Exemption is Fully Supported.**

The Appellants claim that the Class 32 Categorical Exemption is inappropriate because the Project "will have a demonstrably negative impact on historic elements of the warehouse and, accordingly, will result in a substantial adverse change in the significance of the warehouse as a historical resource." As noted above in Section 1 of this letter, the preservation consulting firm, HRG, and the City's own Office of Historic Resources disagree with Appellants' bare assertion. And, Appellants offer no facts to support their unilateral opinion. Just as the original conversion did not result in the 4 much more historically significant structures losing their historic significance, the 1953 warehouse can be converted and the historic significance of the C.B. Van Vorst Co. Manufacturing Plant/Santa Fe Art Colony will be maintained after implementation of the proposed rehabilitation.

Appellants further complain that "CEQA prohibits Categorical Exemptions when the project is located on a "hazardous waste site" and appears on the State Cortese List." However, Appellants nonetheless concede that "the Project is not currently listed on the Cortese list…" Thus, by their own admission the exception does not apply. And, as noted above in Section 2(a), past contamination is being mitigated and the Property is in fact in better condition than it had been historically from an environmental standpoint. The Applicant submitted an air quality assessment prepared by Urban Crossroads, dated July 16, 2020, that evaluated non-carcinogenic exposures and potential cancer and non-cancer risks due to its location in an industrial area and adjacent to a concrete recycling use, located west of the property, and the analysis concludes the health risks were less than significant. (LOD page 9).

Another Appellant claims: "construction of any kind will negatively impact the current tenants, the future tenants, the neighbors, and any workers involved"; "[t]he current air quality is a continuous challenge to anyone in this general vicinity given the many and diverse businesses and industry that neighbor us"; and "[t]he noise pollution here is at a fever pitch, and is already on the verge of being unhealthy and unsustainable." As a matter of law, however, to the extent Appellants seek an analysis of the "impacts that concrete dust will have on current and future residents" or indeed any other analysis of how current environmental conditions (such as the claimed hazardous materials, noise and existing air quality) will impact future or existing residents, they are violating "CEQA's general rule requiring consideration only of *a project's effect on the environment, not the environment's effects on project users*." There is no general "overarching, general requirement that an agency analyze existing environmental conditions whenever they pose a risk to the future residents or users of a project. (emphasis added)" (Berkeley Hills Watershed Coalition v. City of Berkeley, 31 Cal.App.5th 880, at 894 (2019), citing California Building Industry Assn. v. Bay Area Air Quality Management Dist., 62 Cal.4th 369, at 392 (2015).)

The environmental analysis that Appellant's apparently seek is neither required, nor indeed permitted, under CEQA. The fact that the Art Colony has existed and thrived for several decades, and continues to be a vibrant, safe, and healthy place to live and work, is itself substantial evidence that a Class 32 exemption is appropriate.

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There is no basis for the CAPC to determine that the environmental clearance for the project was issued in error, and thus no basis to grant an appeal based on such a finding.

4. **<u>There is No Nexus For Requiring Affordable Housing</u>**

   a) The Project will Provide 18 New units of Artist in Residence Housing without any subsidy or Deviation from the Code; the addition of Affordable Housing is not legally required.

Appellants claim that *"[g]iven the dire need for affordable units in Los Angeles, it is irresponsible and inconsistent with state and local housing directives to allow private developments to gentrify existing affordable enclaves without providing additional affordable units. The Project incorporates 18 new market rate units without any dedication for affordable housing units. For this reason, the Project should not be approved unless a significant percentage of the proposed units are dedicated for use as affordable housing*."

This argument has no grounding in the law, and the fact is the Art Colony is not an "affordable enclave". In is currently an Artist in Residence complex, and it will continue to be one following conversion of the warehouse. The original conversion in the 1980's was facilitated by a loan from the former redevelopment agency, and as a result some of the units were covenanted for low and moderate housing for thirty years. But those covenants expired years ago, and a court has rejected the tenants claims regarding the Applicant's inability to charge market rents. (See Minute Order dated September 8, 2021 attached as Exhibit E). Moreover, as a factual matter at least 20 of the tenants have not actually paid rent since January 2020, long before the pandemic and any associated hardship. Nor have these tenants had to demonstrate current income or net worth sufficient to qualify for below market rents. Indeed as part of a failed attempt to purchase the Art Colony, the tenant association was itself contemplating the conversion of the warehouse to housing, and even potentially seeking an R4 zoning overlay (without any affordable housing provided). (See email dated April 10, 2019 attached as Exhibit F).

The Applicant is not seeking any discretionary approval that creates a legal nexus for the City of Los Angeles to require the provision of on- or off-site affordable units. The process for converting industrial buildings to artist in residence units does not include any affordability requirement, not does the Project utilize any affordable housing incentive programs such as a State Density Bonus (SB 1818/AB 1763), or the City's Transit Oriented Communities Program. The Applicant is seeking no deviations from the municipal code with regard to density floor area, height, setbacks, or other development standard necessary to accommodate 18 live-work units on-site. Therefore, as cited earlier, there is no legal nexus for the City to require affordable housing on-site.

Notwithstanding assertions by the Appellants, there is no displacement of tenants at all here – this is the last of the 5 buildings to be converted and the units would be additive to the existing community and supply of live/work units. Furthermore, in accordance with LAMC Section 12.24.X.13, and all units will necessarily be restricted to <u>artists</u>. Any insinuation by

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existing residents that new units are inappropriate is basically NIMBY behavior – that the Property is perfectly acceptable for them to live at, but no one else should be allowed in.

CONCLUSION

The case file includes comprehensive documentation and extensive technical analysis to support the determination by the ZA. The appeals before you are baseless, have no legal merit, and only constitute additional attempts by the current tenants to stop any project proposed on the subject property. Therefore, we respectfully request again that you deny the appeals to the Project and uphold the decision of the ZA regarding this Project.

Sincerely,
Three6ixty

Dana A. Sayles, AICP
Applicant Representative

Cc: Kevin De León, Councilmember District 14
Emma Howard, Planning Deputy, CD 14
Osvaldo Garcia, Department of City Planning
Rogelio Navar, Fifteen Group
Amy Forbes, Gibson, Dunn & Crutcher LLP

EXHIBITS:

A – Cultural Heritage Resolution dated 7/27/2005
B – Phase I Report dated 9/10/2019
C – Suns Trading Letter
D – Article from Meybohm Commercial dated 4/3/2021
E – Minute Order from the Superior Court of California dated 9/8/21
F – Email dated 4/10/19

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EXHIBIT A

Cultural Heritage Resolution dated 7/27/2005

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Cultural Heritage Commission

200 North Spring Street, Room 532, Los Angeles, CA 90012 (213) 978-1300
www.cityofla.org/PLN/index.htm

DETERMINATION OF THE CULTURAL HERITAGE COMMISSION

July 27, 2005

COMMISSION RESOLUTION - DELEGATION OF AUTHORITY

At its meeting of June 15, 2005, the Cultural Heritage Commission:

Approved the attached Resolution, as amended, permitting the Director of Planning or designee to act on behalf of the Cultural Heritage Commission on certain matters.

This action was taken by the following votes:

Moved:	Louie
Seconded:	Younger
Ayes:	Barron, Martin
Absent:	Carlisle
Vote:	**4-0**

G. Williams

Gabriele Williams, Commission Executive Assistant II
Cultural Heritage Commission

Attachments: Resolution

c: Robert Sutton, Deputy Director
Dave Gay, Principal Planner, Community Planning Division
Jay Oren/Lambert Giessinger, Historic Resources Office

RESOLUTION

WHEREAS, the delegation of authority to the Director of Planning or designee acting on behalf of the Cultural Heritage Commission has been a longstanding practice; and

WHEREAS, such designation of authority by the Commission has been successful in reducing the number of Cultural Heritage Commission actions on routine matters or of a repetitive nature; and

WHEREAS, there will likely continue to be instances involving routine or repetitive matters; and

WHEREAS, it is necessary to continue the general policy allowing the delegation of authority to the Director to approve plans for the alteration or addition of Historic-Cultural Monuments that meet the Secretary of the Interior's Standards so as to avoid a considerable number of unnecessary referrals of plan approvals to the Cultural Heritage Commission, provided reasonable guidelines and policies are followed by the Director in the exercise of the delegated authority.

WHEREAS, the Director of Planning and the Commission Office routinely receive requests to continue items scheduled for the Cultural Heritage Commission Agenda; and

WHEREAS, delegating to the Director of Planning the authority to grant requests for continuances of Commission meeting dates to act on specific agenda items would streamline procedures, and benefit the public by preventing unnecessary trips to City Hall without prior knowledge that consideration of their item of interest will be considered at a later date; and

WHEREAS, delegating to the Director certain authority to act for the commission is in general conformance with the purpose and intent of Charter Section 559 in that it will reduce the number of Cultural Heritage Commission actions on minor or routine matters of a repetitive nature, and allow greater public participation on items of interest; and

WHEREAS, delegation of routine items to the Director of Planning is consistent with the Mayor's goals of (1) delivering responsive government services (2) providing services delivered effectively and efficiently (3) making government work better and cost less.

NOW, THEREFORE, BE IT RESOLVED that the Director of Planning or designee acting on behalf of the Cultural Heritage Commission is hereby authorized to:

1. Comment for the Cultural Heritage Commission on Certificates of Appropriateness and Certificates of Compatibility and Preservation Plans which are subject to the provisions of Municipal Code Section 12.20.3, and when he/she determines that such comment conforms to the expressed intent of the Cultural Heritage Commission.

2. Approve or disapprove, in accordance with Administrative Code Section 22.132 or successors on behalf of the Cultural Heritage Commission, plans for the addition, substantial alteration, demolition or removal of a Historic-Cultural Monument, subject to the Secretary of Interior's Standards for Rehabilitation. The Director of designee is also authorized to comment on Environmental Impact Reports affecting Historic-Cultural Monuments.

3. Grant for the Cultural Heritage Commission, routine extensions of time and/or continuances to act on items scheduled to be on the Cultural Heritage Commission agenda;

4. Approve, conditionally approve, or deny resolutions or ordinances, architectural plans, or site plans for the Cultural Heritage Commission which have been the subject of minor changes by the City Council or have been redrafted by the City Attorney as to form and legality and are consistent with the expressed intent of the Cultural Heritage Commission; and

5. Approve for the Cultural Heritage Commission other specific items which from time to time may be expressly delegated to the Director on an ad hoc basis including, but not limited to, correspondence, review of revised plans, wording of historic bronze plaques, etc.

EXHIBIT B

Phase I Report dated 9/10/2019

three6ixty

AEI Consultants

September 10, 2019
Site Visit Date August 30, 2019

PHASE I
ENVIRONMENTAL SITE ASSESSMENT

Property Identification:
Santa Fe Art Colony
2345 South Santa Fe Avenue
Los Angeles, Los Angeles County, California 90058

AEI Project No. 406492

Prepared For:
Fifteen Group
47 NE 36th Street
Miami, Florida 33137

Prepared By:
AEI Consultants
20 Gibson Place, , Suite 310
Freehold, NJ 07728
(732) 414-2720

AEI Main Contact: Eugene A. Belli, REPA, CHMM

Environmental Due Diligence

Building Assessments

Site Investigation & Remediation

Energy Performance & Benchmarking

Industrial Hygiene

Construction Risk Management

Zoning Analysis Reports & ALTA Surveys

National Presence
Regional Focus
Local Solutions

AEI Consultants

September 10, 2019

Mr. Mark Sanders
Fifteen Group
47 NE 36th Street
Miami, Florida 33137

Subject: PHASE I ENVIRONMENTAL SITE ASSESSMENT
Santa Fe Art Colony
2345 South Santa Fe Avenue, Los Angeles, California 90058
AEI Project No. 406492

Dear Mr. Sanders:

AEI Consultants is pleased to provide the results of the Phase I Environmental Site Assessment (Phase I ESA) report of the above referenced address (the "subject property"). This assessment was authorized and performed in accordance with the scope of services outlined in the contract, the scope and limitations of ASTM Standard Practice E1527-13, the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), and the requirements of the lender.

We appreciate the opportunity to provide services to you. If you have any questions concerning this report, or if we can assist you in any other matter, please contact me at (732) 414-2720 or gbelli@aeiconsultants.com.

Sincerely,

Eugene A. Belli, REPA, CHMM
Executive Vice President
AEI Consultants

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APPENDIX H: QUALIFICATIONS

LIST OF COMMONLY USED ABBREVIATIONS

Units	
µg/L	Micrograms per Liter
mg/kg	Milligrams per Kilogram
mg/L	Milligrams per Liter
pCi/L	PicoCuries per Liter
ppb	Parts per Billion
ppm	Parts per Million
Acronyms	
ACM	Asbestos-Containing Material
AHERA	Asbestos Hazard Emergency Response Act
APN	Assessor's Parcel Number
AST	Aboveground Storage Tank
AUL	Activity and Use Limitation
bgs	Below Ground Surface
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes
CERCLA	Comprehensive Environmental Response Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response Compensation and Liability Information System
COC	Contaminant of Concern
CREC	Controlled Recognized Environmental Condition
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
GPR	Ground-Penetrating Radar
HREC	Historical Recognized Environmental Condition
HVAC	Heating, Ventilation and Air Conditioning
HWS	Hazardous Waste Site
LBP	Lead-Based Paint
LCP	Lead Containing Paint
LLP	Landowner Liability Protection
LQG	Large Quantity Generator
LUST	Leaking Underground Storage Tank
MCL	Maximum Contaminant Level
MTBE	Methyl Tertiary Butyl Ether
ND	None Detected
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFA	No Further Action
NOV	Notice of Violation
NPL	National Priorities List
O&M	Operations and Maintenance
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PCE	Perchloroethylene, Tetrachloroethylene, Tetrachloroethene, PERC
RCRA	Resource Conservation and Recovery Act

REC	Recognized Environmental Condition
RP	Responsible Party
SDS	Safety Data Sheet
SEMS	Superfund Enterprise Management System
SQG	Small Quantity Generator
SVOC	Semi-Volatile Organic Compound
TCE	Trichloroethylene, Trichloroethene
TPH	Total Petroleum Hydrocarbons
TPHd	Total Petroleum Hydrocarbons (diesel range)
TPHg	Total Petroleum Hydrocarbons (gasoline range)
TPHo	Total Petroleum Hydrocarbons (oil range)
TRPH	Total Recoverable Petroleum Hydrocarbons
USDA	United States Department of Agriculture
USGS	United States Geological Survey
UST	Underground Storage Tank
VOC	Volatile Organic Compound

PROJECT SUMMARY

Santa Fe Art Colony
2345 South Santa Fe Avenue, Los Angeles, Los Angeles County, California 90058

Report Section	Acceptable	Requires O&M	Additional Research Required	Phase II	Abatement Required	Costs	Comments
Historical Summary	✔						
Regulatory Database Records Review	✔						
Asbestos-Containing Materials	✔						Maintain ACM O&M Plan
USTs	✔						
ASTs	✔						
Radon	✔						
Lead in Drinking Water	✔						
Lead-Based Paint	✔						Maintain LBP O&M Plan
PCBs	✔						
Waste Sites	✔						
RECs on Neighboring Properties	✔						
On-Site Operations	✔						
Hazardous Materials	✔						
Wetlands	✔						
Dry Cleaners	✔						
Mold	✔						
Other	✔						

COMMENT	
RECs	None identified.
CRECs	None identified.
HRECs	None identified.
Other	In 2017, soil vapor was identified at the Property. While PCE and TCE were detected in the soil vapor, soil samples indicate that the property was not the source. Based on concentration gradients it was demonstrates that the source was from the adjacent property to the north (2305 South Santa Fe Avenue). To mitigate the indoor air impacts from the adjacent site, a soil vapor extraction and treatment (SVET) system was installed at the subject property by AEI in 2019. The SVET system began operating in April 2019, and continues to be operated, maintained, monitored, and adjusted for optimal performance. No further action other than continued operation of the SVET is warranted at this time.

COMMENT	
	Asbestos - Based on the age of the buildings, asbestos may be present in the building material. Building materials were in good condition and can be effectively managed as part of an asbestos Operations and Maintenance (O&M) Plan. Lead-based Paint - Based on the age of the buildings, lead-based paint may be present. All painted areas were in good condition, with no chalking or peeling, and can be effectively managed as part of a lead-based paint Operations and Maintenance (O&M) Program.

EXECUTIVE SUMMARY

AEI Consultants (AEI) was retained by Fifteen Group to conduct a Phase I ESA in conformance with the contract and the scope and limitations of ASTM Standard Practice E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) for the property located at 2345 South Santa Fe Avenue, Los Angeles, Los Angeles County, California. Any exceptions to, or deletions from, this practice are described in Sections 1.4, 1.5, and 1.6 of this report.

PROPERTY DESCRIPTION

PROPERTY INFORMATION	
Subject Property Name	Santa Fe Art Colony
Street Address(es)	2345 South Santa Fe Avenue
City	Los Angeles
State	California
Location	West side of Santa Fe Avenue, approximately 260 feet north of the intersection of Santa Fe Avenue and East 25th Street.
Vicinity Characteristics	Industrial
Approximate Site Acreage/Source	3.39 acres/Assessor
Subject Property Type	Multifamily
Subject Property Use(s)	Residential art studios
Assessor Parcel Number(s)	5167-00-012
SITE AND BUILDING INFORMATION	
Number of Buildings	5
Year(s) of Construction	1916 (three buildings), 1924, and 1953
Number of Floors/Stories	Four 1-story buildings (2345, 2349, 2415, and 2421)/and one 2-story building (2401)
Basement or Subgrade Area(s)	One basement within the 2401 Building; no others observed
Number of Units	58
Building Area (SF)/Source	95,674 SF/Client provided
Building Description(s)	One two-story brick building with basement and elevator (2401); four single-story brick buildings with slab-on-grade foundations (2345, 2349, 2415, and 2421)
Building Occupant(s)	Santa Fe Art Colony
Additional Improvements	Paved parking areas and access ways, brick exterior courtyards and common areas, gated and fenced entryways.
Current On-site Operations	Residences, art studios, office activities, and storage
Current Use of Hazardous Substances	Limited quantities of paints and art supplies; refer to Section 7.1.
UTILITY PROVIDER INFORMATION	
Natural Gas Provider	Southern California Gas Company
Electricity Provider	City of Los Angeles Department of Water and Power
Heating System Fuel Source	Natural gas
Cooling System Power Source	Electricity
Potable Water Provider or Source	City of Los Angeles Department of Water and Power
Sewage Disposal Provider or Treatment System	City of Los Angeles / Municipal Sewer
REGULATORY INFORMATION	
Regulatory Database Listings	HAZNET

Institutional Controls	None identified
Engineering Controls	None identified
Environmental Liens	None identified

Based on a review of historical sources, the subject property was developed for industrial use in 1916. Between 1916 and 1985, the property was utilized at various times as a furniture and mattress factory, warehousing, machinery and scale manufacturing, steel foundry, milling company, molding and trim factory, spring and wire factory, bathrobe manufacturing, art products manufacturing and storage, lithography, polymer factory and a truck dealer. An incinerator operated at the property from the 1920s through the 1980s. A railroad spur extended across the center of the property from the southwest to central-eastern portions of the site during industrial operations. In 1985, the four buildings at 2369, 2401, 2415, and 2421 South Santa Fe Avenue were converted into the current Santa Fe Art Colony and the building at 2345 South Santa Fe Avenue was converted for commercial warehouse and distribution use. The property has been utilized as an art colony and warehouse since that time.

The following historical addresses were associated with the subject property: 2345, 2369, 2401, 2415, and 2421 South Santa Fe Avenue. These addresses were also researched as part of this assessment.

The immediately surrounding properties consist of the following:

Direction from Site	Tenant/Use (Address)	Regulatory Database Listing(s)
North	XCVI, LLC/warehouse (2305-2311 South Santa Fe Avenue)	RCRA NonGen/NLR, ENVIROSTOR (2309-2311 South Santa Fe Avenue) CPS-SLIC (2305 South Santa Fe Avenue)
East	South Santa Fe Avenue, followed by: Accetech Co/wholesale jewelry (2424 East 24th Street) SoCal Recycling Industries/recycling center (2417 East 25th Street)	UST (2414 South Santa Fe Avenue) CPS SLIC, CERS, UST (2418-2420 South Santa Fe Avenue) EDR Hist Auto (2424 South Santa Fe) SWEEPS UST, CA FID UST, NPDES, HAZMAT (2417 East 25th Street)
South	Distribution warehouse (2431 South Santa Fe Avenue) Distribution warehouse (2145 East 25th Street)	None identified
West	25th Street Recycling/concrete and asphalt recycling center (2121 East 25th Street)	RCRA-SQG, FINDS, ECHO, HIST UST, NPDES, HAZMAT,

Direction from Site	Tenant/Use (Address)	Regulatory Database Listing(s)
		CIWQS, CERS, SWEEPS UST, HIST UST, CA FID UST, WDS (2121 East 25th Street)

Based upon topographic map interpretation, the direction of groundwater flow beneath the subject property is inferred to be to the southeast, toward the channelized Los Angeles River. Based on groundwater monitoring data for a nearby site at 2830 East Washington Boulevard (located approximately 0.75 mile east of the subject property) obtained from GeoTracker, groundwater is presumed to be present at an estimated depth of 220 feet bgs.

CONCLUSIONS

AEI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of 2345 South Santa Fe Avenue, Los Angeles, Los Angeles County, California, the Property. Any exceptions to or deletions from this practice are described in Section 1.5 of this report.

This assessment has revealed no evidence of Recognized Environmental Conditions (RECs) or Controlled Recognized Environmental Conditions (CRECs) in connection with the subject property.

Other Environmental Considerations include, but are not limited to, de minimis conditions and/ or business environmental risks such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in the ASTM Standard. These may also affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the subject property.

The following related issues of concern were identified:

- In 2017, soil vapor was identified at the Property. While PCE and TCE were detected in the soil vapor, soil samples indicate that the property was not the source. Based on concentration gradients it was demonstrates that the source was from the adjacent property to the north (2305 South Santa Fe Avenue). To mitigate the indoor air impacts from the adjacent site, a soil vapor extraction and treatment (SVET) system was installed at the subject property by AEI in 2019. The SVET system began operating in April 2019, and continues to be operated, maintained, monitored, and adjusted for optimal performance. No further action other than continued operation of the SVET is warranted at this time.

- Asbestos - Based on the age of the buildings, asbestos may be present in the building material. Building materials were in good condition and can be effectively managed as part of an asbestos Operations and Maintenance (O&M) Plan.

- Lead-based Paint - Based on the age of the buildings, lead-based paint may be present. All painted areas were in good condition, with no chalking or peeling, and can be effectively managed as part of a lead-based paint Operations and Maintenance (O&M) Program.

1.0 INTRODUCTION

This report documents the methods and findings of the Phase I ESA performed in conformance with the contract and scope and limitations of ASTM Standard Practice E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) for the property located at 2345 South Santa Fe Avenue, Los Angeles, Los Angeles County, California (Appendix A: Figures and Appendix B: Property Photographs).

1.1 SCOPE OF WORK

The purpose of the Phase I ESA is to assist the client in identifying potential RECs, in accordance with ASTM E1527-13, associated with the presence of any hazardous substances or petroleum products, their use, storage, and disposal at and in the vicinity of the subject property. Property assessment activities focused on: 1) a review of federal, state, tribal and local databases that identify and describe underground fuel tank sites, leaking underground fuel tank sites, hazardous waste generation sites, and hazardous waste storage and disposal facility sites within the ASTM approximate minimum search distance; 2) a property and surrounding site reconnaissance, and interviews with the past and present owners and current occupants and operators to identify potential environmental contamination; and 3) a review of historical sources to help ascertain previous land use at the site and in the surrounding area.

The goal of AEI Consultants in conducting the environmental site assessment was to identify the presence or likely presence of any hazardous substances or petroleum products on the subject property that may indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum product into the soil, groundwater, or surface water of the subject property. If such conditions were identified, they would be characterized as one of the following:

Recognized Environmental Condition (REC) - is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to 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.

Historical Recognized Environmental Condition (HREC) - 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 any required controls.

Controlled Recognized Environmental Condition (CREC) - A past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

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

Other Environmental Considerations include, but are not limited to, de minimis conditions and/or business environmental risks (BERs) such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in the ASTM Standard. These may also affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the subject property.

1.2 Additional Services

Other Environmental Considerations such as ACMs, LBP, lead in drinking water, radon, mold, and wetlands can result in business environmental risks for property owners which may disrupt current or planned operations or cash flow and are generally beyond the scope of a Phase I assessment as defined by ASTM E1527-13. Based upon the agreed-on scope of services this ESA did not include subsurface or other invasive assessments, business environmental risks, or other services not specifically identified and discussed herein.

1.3 Significant Assumptions

The following assumptions are made by AEI in this report. AEI relied on information derived from secondary sources including governmental agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, and personal interviews. AEI has reviewed and evaluated the thoroughness and reliability of the information derived from secondary sources including government agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, or personal interviews. It appears that all information obtained from outside sources and reviewed for this assessment is thorough and reliable. However, AEI cannot guarantee the thoroughness or reliability of this information.

Groundwater flow, unless otherwise specified by on-site well data or well data from the subject property or nearby sites, is inferred from contour information depicted on the USGS topographic maps. AEI assumes the subject property has been correctly and accurately identified by the client, designated representative of the client, property contact, property owner, and property owner's representatives.

1.4 Limitations

Property conditions, as well as local, state, tribal, and federal regulations can change significantly over time. Therefore, the recommendations and conclusions presented as a result of this assessment apply strictly to the environmental regulations and property conditions existing at the time the assessment was performed. Available information has been analyzed using currently accepted assessment techniques and it is believed that the inferences made are reasonably

representative of the property. AEI makes no warranty, expressed or implied, except that the services have been performed in accordance with generally accepted environmental property assessment practices applicable at the time and location of the assessment.

Considerations identified by ASTM as beyond the scope of a Phase I ESA that may affect business environmental risk at a given property include the following: ACMs, radon, LBP, lead in drinking water, wetlands, regulatory compliance, cultural and historical resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, mold, and high voltage lines. These environmental issues or conditions may warrant assessment based on the type of the property transaction; however, they are considered non-scope issues under ASTM Standard Practice E1527-13.

If requested by the client, these non-scope issues are discussed herein. Otherwise, the purpose of this assessment is solely to satisfy one of the requirements for qualification of the innocent landowner defense, contiguous property owner or bona fide prospective purchaser under CERCLA. ASTM Standard Practice E1527-13 and the United States EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) constitute the "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in:

1. 42 U.S.C. § 9601(35)(B), referenced in the ASTM Standard Practice E1527-13.
2. Sections 101(35)(B) (ii) and (iii) of CERCLA and referenced in the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312).
3. 42 U.S.C. § 9601(40) and 42 U.S.C. § 9607(q).

The Phase I ESA is not, and should not be construed as, a warranty or guarantee about the presence or absence of environmental contaminants that may affect the property. Neither is the assessment intended to assure clear title to the property in question. The sole purpose of assessment into property title records is to ascertain a historical basis of prior land use. All findings, conclusions, and recommendations stated in this report are based upon facts, circumstances, and industry-accepted procedures for such services as they existed at the time this report was prepared (i.e., federal, state, and local laws, rules, regulations, market conditions, economic conditions, political climate, and other applicable matters). All findings, conclusions, and recommendations stated in this report are based on the data and information provided, and observations and conditions that existed on the date and time of the property reconnaissance.

Responses received from local, state, or federal agencies or other secondary sources of information after the issuance of this report may change certain facts, findings, conclusions, or circumstances to the report. A change in any fact, circumstance, or industry-accepted procedure upon which this report was based may adversely affect the findings, conclusions, and recommendations expressed in this report.

AEI's limited radon screening, if included, is intended to provide a preliminary screening to evaluate the potential presence of elevated radon concentrations at the site. The proposed scope is not intended to define the full extent of the presence of radon at the subject property. As such, the results should be used for lending purposes only. The recommendations and conclusions presented as a result of the limited preliminary radon screening apply strictly to the property

conditions existing at the time the sampling was performed. The sample analytical results are only valid for the time, place, and condition of the site at the time of collection and AEI does not warrant that the results will be repeatable or are representative of past or future conditions.

1.5 Limiting Conditions/Deviations

The performance of this Phase I ESA was limited by the following:

- AEI observed a representative sample of interior units: 2349-D and 2401-201. In addition, AEI observed common and exterior areas of the property, including the laundry room, maintenance room, parking lot areas, elevator, parking areas, and SVE compound. Based on the nature of property occupancy (residential), this method of assessment is presumed to be appropriate due to the size of the subject property.

- The User did not complete the ASTM User Questionnaire or provide the User information to AEI. AEI assumes that qualification for the LLPs is being established by the User in documentation outside of this assessment.

1.6 Data Gaps and Data Failure

According to ASTM E1527-13, data gaps occur when the Environmental Professional is unable to obtain information required by the Standard, despite good faith efforts to gather such information. Pursuant to ASTM E1527-13, only significant data gaps, defined as those that affect the ability of the Environmental Professional to identify RECs, need to be documented.

Data failure is one type of data gap. According to ASTM E1527-13, data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met. Pursuant to ASTM E1527-13, historical sources are required to document property use back to the property's first developed use or back to 1940, whichever is earlier, or periods of five years or greater.

1.6.1 Data Failure

AEI did not identify evidence of data failure during the course of this assessment.

1.6.2 Data Gaps

AEI did not identify significant data gaps which affected our ability to identify RECs.

1.7 Reliance

All reports, both verbal and written, are for the benefit of Fifteen Group. This report has no other purpose and may not be relied upon by any other person or entity without the written consent of AEI. Either verbally or in writing, third parties may come into possession of this report or all or part of the information generated as a result of this work. In the absence of a written agreement with AEI granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against AEI, its officers, employees, vendors, successors,

or assigns. Reliance is provided in accordance with AEI's Proposal and Standard Terms and Conditions executed by Fifteen Group on June 3, 2019. The limitation of liability defined in the Terms and Conditions is the aggregate limit of AEI's liability to the client and all relying parties.

2.0 SITE AND VICINITY DESCRIPTION

2.1 SITE LOCATION AND DESCRIPTION

PROPERTY INFORMATION	
Subject Property Name	Santa Fe Art Colony
Street Address(es)	2345 South Santa Fe Avenue
City	Los Angeles
State	California
Location	West side of Santa Fe Avenue, approximately 260 feet north of the intersection of Santa Fe Avenue and East 25th Street.
Vicinity Characteristics	Industrial
Approximate Site Acreage/Source	3.39 acres/Assessor
Subject Property Type	Multifamily
Subject Property Use(s)	Residential art studios
Assessor Parcel Number(s)	5167-00-012
SITE AND BUILDING INFORMATION	
Number of Buildings	5
Year(s) of Construction	1916 (three buildings), 1924, and 1953
Number of Floors/Stories	Four 1-story buildings (2345, 2349, 2415, and 2421)/and one 2-story building (2401)
Basement or Subgrade Area(s)	One basement within the 2401 Building; no others observed
Number of Units	58
Building Area (SF)/Source	95,674 SF/Client provided
Building Description(s)	One two-story brick building with basement and elevator (2401); four single-story brick buildings with slab-on-grade foundations (2345, 2349, 2415, and 2421)
Building Occupant(s)	Santa Fe Art Colony
Additional Improvements	Paved parking areas and access ways, brick exterior courtyards and common areas, gated and fenced entryways.
Current On-site Operations	Residences, art studios, office activities, and storage
Current Use of Hazardous Substances	Limited quantities of paints and art supplies; refer to Section 7.1.
UTILITY PROVIDER INFORMATION	
Natural Gas Provider	Southern California Gas Company
Electricity Provider	City of Los Angeles Department of Water and Power
Heating System Fuel Source	Natural gas
Cooling System Power Source	Electricity
Potable Water Provider or Source	City of Los Angeles Department of Water and Power
Sewage Disposal Provider or Treatment System	City of Los Angeles / Municipal Sewer
REGULATORY INFORMATION	
Regulatory Database Listings	HAZNET
Institutional Controls	None identified
Engineering Controls	None identified
Environmental Liens	None identified

Utility provider information listed in the table above is provided by the respective utility providers, unless otherwise noted above.

Refer to Appendix A: Figures and Appendix B: Property Photographs for site location and description.

2.2 Site and Vicinity Characteristics

The immediately surrounding properties consist of the following:

Direction from Site	Tenant/Use (Address)	Regulatory Database Listing(s)
North	XCVI, LLC/warehouse (2305-2311 South Santa Fe Avenue)	RCRA NonGen/NLR, ENVIROSTOR (2309-2311 South Santa Fe Avenue) CPS-SLIC (2305 South Santa Fe Avenue)
East	South Santa Fe Avenue, followed by: Accetech Co/wholesale jewelry (2424 East 24th Street) SoCal Recycling Industries/recycling center (2417 East 25th Street)	UST (2414 South Santa Fe Avenue) CPS SLIC, CERS, UST (2418-2420 South Santa Fe Avenue) EDR Hist Auto (2424 South Santa Fe) SWEEPS UST, CA FID UST, NPDES, HAZMAT (2417 East 25th Street)
South	Distribution warehouse (2431 South Santa Fe Avenue) Distribution warehouse (2145 East 25th Street)	None identified
West	25th Street Recycling/concrete and asphalt recycling center (2121 East 25th Street)	RCRA-SQG, FINDS, ECHO, HIST UST, NPDES, HAZMAT, CIWQS, CERS, SWEEPS UST, HIST UST, CA FID UST, WDS (2121 East 25th Street)

If the surrounding properties are listed in the regulatory database, please refer to Section 5.1 for discussion.

2.3 Physical Setting

Geology: According to information obtained from the USGS, the area surrounding the subject property is underlain by Holocene- and Pleistocene-aged alluvial deposits. Based on a review of the USDA Soil Survey for the area of the subject property, the soils in the vicinity of the subject property are classified as the Urban land series. Soils from this series are characterized

as mixed alluvium and human-transported fill. The entire subject property is covered by an impervious pavement layer. During recent soil vapor system installation activities, soil at the site was observed to be tan to light brown, moist, silty sand and fine-grained sand.

USGS Topographic Map:	Los Angeles, California Quadrangle
Nearest surface water to subject property:	Los Angeles River/0.5 mile east
Gradient Direction/Source:	South-southeast/topographic map interpretation
Estimated Depth to Groundwater/Source:	220 feet bgs/groundwater monitoring data for a nearby site at 2830 East Washington Boulevard (located approximately 0.75 mile east of the subject property) obtained from GeoTracker
Wetlands:	No / National Wetlands Inventory
Flood Zone Information:	Zone X / Fema Map 06037C1638G dated 12/21/ 2008

Note: Groundwater flow direction can be influenced locally and regionally by the presence of local wetland features, surface topography, recharge and discharge areas, horizontal and vertical inconsistencies in the types and location of subsurface soils, and proximity to water pumping wells. Depth and gradient of the water table can change seasonally in response to variation in precipitation and recharge, and over time, in response to urban development such as storm water controls, impervious surfaces, pumping wells, cleanup activities, dewatering, seawater intrusion barrier projects near the coast, and other factors.

According to the US Fish and Wildlife Service Geospatial Wetlands Information online map interface (http://www.fws.gov/wetlands/Data/Mapper.html), there are no jurisdictional wetlands on the subject property.

3.0 HISTORICAL REVIEW OF SITE AND VICINITY

3.1 HISTORICAL SUMMARY

Reasonably ascertainable standard historical sources as outlined in ASTM Standard E1527-13 were used to determine previous uses and occupancies of the subject property that are likely to have led to RECs in connection with the subject property. A chronological summary of historical data found, including but not limited to aerial photographs, historical city directories, Sanborn fire insurance maps, and agency records, is as follows:

Date Range	Subject Property Description/Use	Source(s)
1894-1915	Vacant and/or residential land	Topographic Maps, Previous Reports
1916-1924	Developed with a furniture and mattress factory (C B Van Vorst Company), including a storage building, warehouse building, planing mill, and rail spur	Agency Records, City Directories, Sanborn Maps, Previous Reports
1924-1936	Developed with an additional warehouse building/furniture factory	Agency Records, City Directories, Sanborn Maps, Aerial Photographs, Previous Reports
1936-1953	Developed with four industrial warehouse buildings and rail spur/ including a furniture factory, scale manufacturer, steel corporation and truck dealer	Agency Records, City Directories, Sanborn Maps, Aerial Photographs, Previous Reports
1953-1985	Developed with an additional warehouse building for a total of five industrial warehouse buildings and a rail spur/furniture company, soft goods company, warehouse (Firestone tires), wire manufacturing company	Agency Records, City Directories, Sanborn Maps, Aerial Photographs, Previous Reports
1985-present	Developed with five buildings and paved parking areas/ four buildings utilized as an art colony artist-in-residence facility and one building utilized as a distribution warehouse	Agency Records, City Directories, Sanborn Maps, Aerial Photographs, Previous Reports, Interviews, Site Observations

Based on a review of historical sources, the subject property was developed for industrial use in 1916. Between 1916 and 1985, the property was utilized at various times as a furniture and mattress factory, warehousing, machinery and scale manufacturing, steel foundry, milling company, molding and trim factory, spring and wire factory, bathrobe manufacturing, art products manufacturing and storage, lithography, polymer factory and a truck dealer. An incinerator operated at the property from the 1920s through the 1980s. A railroad spur extended across the center of the property from the southwest to central-eastern portions of the site during industrial operations. In 1985, the four buildings at 2369, 2401, 2415, and 2421 South Santa Fe Avenue were converted into the current Santa Fe Art Colony and the building at 2345 South Santa Fe Avenue was converted for commercial warehouse and distribution use. The property has been utilized as an art colony and warehouse since that time.

The following historical addresses were associated with the subject property: 2345, 2369, 2401, 2415, and 2421 South Santa Fe Avenue. These addresses were also researched as part of this assessment.

3.2 Aerial Photographs

AEI reviewed aerial photographs of the subject property and surrounding area. A search was made of the NETR Online (www.historicaerials.com) collection of aerial photographs as well as those provided in previous reports. Aerial photographs were reviewed for the following years:

Year(s)	Subject Property Description	Adjacent Site Descriptions
1923	Developed with what appears to be three large industrial warehouses, a rail spur, and a smaller industrial warehouse building.	NORTH: Developed with storage yards and multiple industrial buildings. EAST: Roadway followed by residential and smaller commercial/industrial buildings. SOUTH: Developed with multiple commercial industrial buildings. WEST: Rail lines followed by a storage yard.
1928	Developed with an additional warehouse building in the south-central portion of the property; otherwise, no other significant changes are apparent.	NORTH: No significant changes are apparent. EAST: No significant changes are apparent. SOUTH: No significant changes are apparent. WEST: No significant changes are apparent.
1938	No significant changes are apparent.	NORTH: No significant changes are apparent. EAST: The residences and former commercial/ industrial buildings are redeveloped with industrial warehouse buildings in a different configuration. SOUTH: No significant changes are apparent. WEST: No significant changes are apparent.
1948, 1952	The western portion of the property is cleared and apparently used for storage; otherwise, no other significant changes are apparent.	NORTH: Several storage areas are no longer apparent and the buildings are in a slightly different configuration. EAST: No significant changes are apparent. SOUTH: No significant changes are apparent. WEST: The property is utilized for storage.
1964, 1977, 1983	The northwestern portion of the property is redeveloped with a warehouse building. The remaining areas of the property appear to be paved; otherwise, no other significant changes are apparent.	NORTH: No significant changes are apparent. EAST: No significant changes are apparent. SOUTH: The south-southwest adjacent buildings have been redeveloped into a larger warehouse building. WEST: Additional storage is apparent in the western property.
1994, 2005, 2012, 2014, 2016	No significant changes are apparent.	NORTH: The property has been redeveloped with several large warehouse-style buildings. EAST: No significant changes are apparent. SOUTH: No significant changes are apparent. WEST: The property is vacant and apparently undergoing grading or excavation.

If available, copies of historical aerial photographs are provided in the report appendices.

3.3 SANBORN FIRE INSURANCE MAPS

Sanborn Fire Insurance maps were developed in the late 1800s and early 1900s for use as an assessment tool for fire insurance rates in urbanized areas. A search was made of the EDR collection of Sanborn Fire Insurance maps.

The following maps were reviewed:

Year(s)	Subject Property Description (Listed Address)	Adjacent Site Descriptions
1920	Depicted as developed as an industrial property, labeled "C.B. Van Vorst Company, Furniture and Mattress Company." (2401, 2413, and 2421 Santa Fe Avenue). U*ncluding the following: One two-story building with a basement is depicted in the northeast portion of the site. The building is labeled as having a picker room, spring storage in the basement, iron spring manufacturing on the first floor with offices, and mattress manufacturing and storage on the second floor. An elevator is depicted in the southern portion of the building. A one-story furniture warehouse is depicted in the southeast corner of the property. The building is labeled with a furniture warehouse, finishing room, and furniture manufacturing area with glue pots. The building is noted as kerosene heated. A planing mill is depicted in the north-central section with electric power and wood spring manufacturing. Three lumber sheds and a shaving bin are depicted to the west of the planing mill building. A rail spur is depicted running from the east-central portion of the property, across the middle, and to the southwest portion of the site. A small storage building is located in the south-central portion of the property.	NORTH: Developed with a planing mill and box factory with multiple lumber sheds. Labeled as "Southern California Box Company." EAST: Santa Fe Avenue, with residential duplexes, stores, linseed oil storage and lubricating oils storage (Pennant Oil & Grease Co), and Union Tank and Pipe Company manufacturing beyond. SOUTH: Developed with the Nichols-Loomis Company, with hay storage and a grain mill. WEST: Railroad spur followed by vacant land
1949	Depicted as developed in the same general configuration as the 1920 map, with the addition of a single-story manufacturing warehouse building in the south-central portion of the property. The new building is labeled as a stock room and finishing department. A small residence is located adjacent to the west of the warehouse. The northeastern building is depicted as a	NORTH: The facility to the north is labeled as the L.A. Basket Company EAST: The residences have been redeveloped with a machine tool rebuilding company. A brass and aluminum foundry, restaurant, heat treating and sand blasting facility, and truck wheel sales ware house with a machine shop are located east beyond Santa Fe Avenue. SOUTH: The property to the south is depicted

Year(s)	Subject Property Description (Listed Address)	Adjacent Site Descriptions
	wholesale furniture warehouse. The southeastern building is labeled as a furniture manufacturing, upholstering and sewing warehouse. The north central warehouse building is labeled a planing mill and cabinet shop. A lumber shed is located to the west of the planing mill building. A round iron and brick structure is located between the north central warehouse building and lumber shed; the structure is labeled an incinerator. Rail spurs run north to south along the west side of the property.	as a glass warehouse, scrap metal warehouse, and scrap metal and junk yard. WEST: Railroad spurs followed by two small storage buildings. The yard area of the west adjacent property is labeled as a scrap metal yard.
1953	The north-central onsite building is labeled a woodworking, moulding and trim shop. The southeast building is labeled a moulding manufacturing and warehouse. The residential dwelling is no longer depicted. No other significant changes are depicted.	NORTH: No significant changes are depicted. EAST: No significant changes are depicted. SOUTH: No significant changes are depicted. WEST: No significant changes are depicted.
1955	The northeast, southeast, and north central buildings are depicted in the same general configuration as the 1953 map. The south-central warehouse is labeled as a "Juvenile Furniture and Toys Shipping and Receiving" warehouse. The lumber warehouses in the northwestern portion of the site are redeveloped as a one-story warehouse building labeled "Firestone Tire & Rubber Company Cardboard Forms Warehouse." (2345 Santa Fe Avenue, 2401 Santa Fe Avenue, 2415 Santa Fe Avenue, 2421 Santa Fe Avenue)	NORTH: The property is labeled "L.A. Basket - Division of Pacific States Box and Basket Company." A plating shop and associated machine shops are depicted in the central portion of the property. The plating facility and machine shops are part of "Proto Tool Co." EAST: No significant changes are depicted. SOUTH: No significant changes are depicted. WEST: No significant changes are depicted.
1956	The northwestern building is now labeled as a "Furniture Machinery and Miscellaneous Warehouse." No other significant changes are depicted.	NORTH: No significant changes are depicted. EAST: No significant changes are depicted. SOUTH: No significant changes are depicted. WEST: No significant changes are depicted.
1960	The northeastern building is labeled as a toilet preparations and drug warehouse. The southeast, south-central, and north-central buildings are labeled the California Moulding Company. The southeast building is labeled a moulding manufacturing warehouse; the south-central building a finished products warehouse, and the north-central a wooden moulding and trim shop. The northwest building is labeled	NORTH: No significant changes are depicted. EAST: No significant changes are depicted. SOUTH: One of the south adjacent warehouse is listed as vacant. No other significant changes are depicted. WEST: No significant changes are depicted.

Year(s)	Subject Property Description (Listed Address)	Adjacent Site Descriptions
	"Young Spring and Wire Corporation Flexolator Products Manufacturing." No other significant changes are depicted.	
1963	The northeast warehouse is labeled as general merchandise storage. No other significant changes.	NORTH: No significant changes EAST: No significant changes SOUTH: The vacant warehouse is labeled as a foam rubber warehouse. The second south adjacent warehouse has been redeveloped into a transfer and storage warehouse.
1967	The northeast warehouse is labeled as bath robe manufacturing. The southeast warehouse is labeled as a picture frame factory. The north-central warehouse is labeled as woodworking and painting. The south-central warehouse is labeled as a finished products warehouse. The southeast, north central and south central warehouses are labeled "Windsor Art Products Inc." No other significant changes.	NORTH: No significant changes. EAST: No significant changes SOUTH: The foam storage warehouse is labeled as a glass and plastic container warehouse. WEST: No significant changes.
1968	No significant changes are depicted.	No significant changes are depicted.
1970	The subject property is labeled "Terry Tuck Inc." The northeast building is labeled as bathrobe manufacturing. The southeast, north-central, and south-central buildings are labeled as manufacturing. The northwest building is labeled as a warehouse. (2345, 2349, 1401, 2415, and 2421 Santa Fe Avenue)	NORTH: The former basket company is relabeled as "Uniplex Inc. Weaving." No other significant changes. EAST: No significant changes are depicted. SOUTH: No significant changes are depicted. WEST: No significant changes are depicted.

If available, copies of historical Sanborn maps are provided in the report appendices.

3.4 City Directories

A search of historical city directories was conducted for the subject property utilizing EDR. The following table summarizes the results of the city directory search.

Year(s)	Address - Occupant Listed
1917	2401 Santa Fe Avenue - C B Van Vorst Co (mattress manufacturing)
1928	2401 Santa Fe Avenue - C B Van Vorst Co (furniture manufacturing)
1936	2401 Santa Fe Avenue - Fairbanks Morse & Co (scale manufacturer) 2415 Santa Fe Avenue - Triangle Steel Corporation (tress, pipe steel, wire products) 2421 Santa Fe Avenue - Diamond T Truck Co (truck dealers)
1942	2401 S Santa Fe Avenue - Fairbanks Morse & Co machinery 2421 S Santa Fe Avenue - Advance Furniture Manufacturing Co, Louis and Morris Lippman, Paul Shapiro

Year(s)	Address - Occupant Listed
1958	2421 S Santa Fe Avenue - Borin Manufacturing Co, California Moulding & Manufacturing Co
1962	2345 S Santa Fe Avenue - Automotive Division of Young Spring and Wire Company 2401 S Santa Fe Avenue - Terry Tuck Inc. 2421 S Santa Fe Avenue - Borin Manufacturing Co, California Moulding and Manufacturing Co
1966	2345 S Santa Fe Avenue - Young Spring and Wire Company
1967	2345 S Santa Fe Avenue - Young Spring and Wire Company 2401 S Santa Fe Avenue - California Terry Co, Robes of California Co, Terry Tuck Inc. 2421 S Santa Fe Avenue - Windsor Art Products, Inc., Illinois Molding Co., California Molding & Trim Co.
1970	2345 S Santa Fe Avenue - Young Spring and Wire Company
1971	2401 S Santa Fe Avenue - Robes of California Co, Terry Tuck Inc.
1976	2345 S Santa Fe Avenue - Van Brode Sales Co 2401 S Santa Fe Avenue - Robes of California Co, Terry Tuck Inc. 2411 S Santa Fe Avenue - Los Angeles Lithograph Co Inc
1981	2345 S Santa Fe Avenue - Van Brode Milling Co Inc. 2401 S Santa Fe Avenue - Robes of California Co, Terry Tuck Inc.
1986	2345 S Santa Fe Avenue - Tristar Polymers 2401 S Santa Fe Avenue - Robes of California Co, Terry Tuck Inc.
1990	2345 S Santa Fe Avenue - D C Enterprises 2349 S Santa Fe Avenue - Sharpshooters Photographic, M Scharff Artist, Jim Parker, Andrew Newham, Kheradyar Habib 2401 S Santa Fe Avenue - Fox J, Fox-Venti J, Santa Fe Art Colony, and multiple residential tenants 2415 S Santa Fe Avenue - Johnathon White, J Swanger, L A Stark, Catherine Maclean, Philip M Lubin, Geo Legrady, K Hashimoto, Mary Buck 2421 1/2 S Santa Fe Avenue - Carpet Creations
2000	2345 S Santa Fe Avenue - U F O Inc. 2349 S Santa Fe Avenue - Ayenne Applebaum 2401 S Santa Fe Avenue - Multiple residential tenants 2415 S Santa Fe Avenue - Multiple residential tenants 2421 S Santa Fe Avenue - Santa Fe Art Colony, Multiple residential tenants
2006	2349 S Santa Fe Avenue - Jung Won 2401 S Santa Fe Avenue - Multiple residential tenants

Year(s)	Address - Occupant Listed
	2415 S Santa Fe Avenue - Mari y Rok, Rad Reyna, Ral Reyna, Srnathe M Fields, Kyle Kilty, Robet Milne, Apartments 2421 S Santa Fe Avenue - John Swanger, Santa Fe Art Colong, Wam McGovern, Mary BOIC
2010	2345 S Santa Fe Avenue - First USA Vanlines, Guardian Moving and Storage Inc., Hercules Moving Systems Inc, Movers, SWL, Inc.
2014	2345 S Santa Fe Avenue - Calimex Beef Poultry, First USA Vanlines, Guaranteed Price Movers, LLC, Movers, Mbededom Inc, Suns Trading, SWL Inc.

If available, copies of historical city directories are provided in the report appendices.

3.5 Historical Topographic Maps

A search of historical topographic maps was conducted for the subject property utilizing USGS. Topographic maps were reviewed for the following years:

Year(s)	Subject Property Description	Adjacent Site Descriptions
1894, 1900	Undeveloped land	NORTH: Undeveloped land EAST: Roadway followed by a small building SOUTH: Undeveloped land WEST: Undeveloped land
1928	Developed with three industrial-style buildings and a railroad spur.	NORTH: Developed with several small industrial-style buildings EAST: Roadway followed by five industrial-style buildings SOUTH: Three industrial-style buildings WEST: Rail spurs followed by two small industrial-style buildings
1953	Specific structures are not detailed on the map. The property is depicted with a rail spur within the City of Los Angeles boundaries.	NORTH: No structures depicted. EAST: Roadway, with no other structures depicted. SOUTH: No structures depicted. WEST: Rail spur, with no other structures depicted
1966, 1972, 1981	Shaded pink to indicate dense urban development. No other significant changes.	The surrounding areas are shaded to indicate dense urban development. No other significant changes.

If available, copies of historical topographic maps are provided in the report appendices.

3.6 Chain of Title

In accordance with our approved scope of services, a chain of title search was not performed as part of this assessment.

4.0 REGULATORY AGENCY RECORDS REVIEW

Local and state agencies, such as environmental health departments, fire prevention bureaus, and building and planning departments are contacted to identify any current or previous reports of hazardous substance use, storage, and/or unauthorized releases that may have impacted the subject property. In addition, information pertaining to AULs, defined as legal or physical restrictions, or limitations on the use of, or access to, a site or facility, is requested.

4.1 LOCAL ENVIRONMENTAL HEALTH DEPARTMENT AND/OR STATE ENVIRONMENTAL AGENCY

On August 22, 2019, AEI contacted the Los Angeles County Department of Public Health via information on the subject property. Files at this agency may contain information regarding hazardous substance storage and use, underground storage tanks, unauthorized releases of petroleum hydrocarbons or other contaminants that may affect the soil or groundwater in the area, wells and/or septic systems.

According to the records coordinator, the Los Angeles Fire Department maintains jurisdiction over the subject property.

Additionally, AEI reviewed the California Environmental Protection Agency (CalEPA) Regulated Site Portal database. No listings were identified for the subject property. Listings associated with adjacent properties are further discussed in Section 5.1.

4.2 FIRE DEPARTMENT

On August 22, 2019, AEI contacted the Los Angeles Fire Department website for information on the subject property to identify any evidence of previous or current hazardous substance usage and/or for any historical information available for the subject property.

AEI reviewed the database indexes for historical USTs, current and inactive USTs, current and inactive hazardous materials sites, and current and inactive AST sites, which indicated that there was no information indicating current or prior use or storage of hazardous substances on file for the subject property with the Los Angeles Fire Department.

4.3 BUILDING DEPARTMENT

On August 22, 2019, AEI contacted the Los Angeles Department of Building and Safety website for information on the subject property in order to identify historical tenants, features of concern and property use.

Please refer to the following table for a listing of permits reviewed:

Year(s)	Owner/Applicant	Description of Permit and Building Use
1916	C.B. Van Vorst	(2401 S. Santa Fe) - New factory building
1916	C.B. Van Vorst	(2401 S. Santa Fe) - New storage building
1916	C.B. Van Vorst	(2401 S. Santa Fe) - New mill building
1916	C.B. Van Vorst	(2401 S. Santa Fe) - Change front of warehouse
1923	C.B. Van Vorst	(2401 S. Santa Fe) - Tenant improvement, assembling room

Year(s)	Owner/Applicant	Description of Permit and Building Use
1924	C.B. Van Vorst	(2401 S. Santa Fe) - New storage and assembly building
1924	C.B. Van Vorst	(2401 S. Santa Fe) - Tenant improvement
1927	C.B. Van Vorst	(2401 S. Santa Fe) - Office buildout
1928	C.B. Van Vorst	(2421 S. Santa Fe) - Tenant improvement, furniture manufacturing
1930	Lippman & Shipiro	(2421 S. Santa Fe) - Sample room for furniture
1930	Biltmore EI Co. Std.	(2401 S. Santa Fe) - Connect vents for two dry ovens
1930	Geo. Van Vorst	(2401 S. Santa Fe) - Install Van Vorst
1930	Biltmore Ero Co.	(2401 S. Santa Fe) - Install sprinklers
1937	Advance Furniture Co.	(2421 S. Santa Fe) - Addition to warehouse
1938	Advance Furniture Co.	(2421 S. Santa Fe) - Install sprinkler in lumber shed
1944	Geo Van Vorst	(2401 S. Santa Fe) - Masonry vault and office
1947	Van Vorst Properties	(2415 S. Santa Fe) - Replace damaged warehouse truss
1948	Restwell Manufacturing Co	(2421 S. Santa Fe) - Add paint storage room
1949	Van Vorst Properties	(2415 S. Santa Fe) - Tenant improvement furniture company
1953	Van Vorst Properties	(2345 S. Santa Fe) - New warehouse building
1957	Van Vorst Properties / Mobile Incinerator Corp	(2415 S. Santa Fe) - Convert silo to multi-chamber incinerator
1959	Van Vorst Properties	(2401 S. Santa Fe) - Vacant furniture manufacturing to pillow manufacturing use change
1961	Terry Tuck Inc.	(2401 S. Santa Fe) - Certificate of Occupancy
1969	Terry Tuck Inc.	(2401 S. Santa Fe) - Tenant improvement, separate filling room from sewing room
1976	George W. Van Vorst	(2345 S. Santa Fe) - Footing for storage silo
1979	Richard Van Vorst	(2345 S. Santa Fe) - Fire repairs (3% of building)
1986	Michael O'Rourke	(2401 S. Santa Fe) - Tenant improvement, partitions
1987	Santa Fe Art Colony	(2401 S. Santa Fe) - Convert buildings to artist in residence
1988	Santa Fe Art Colony	(2415 S. Santa Fe) - Mezzanine remodel
1988	Santa Fe Art Colony	(2415 S. Santa Fe) - Loft addition
1989	Santa Fe Art Colony	(2421 S. Santa Fe) - Convert to artist in residence
2013	Santa Fe Art Colony	(2349 S. Santa Fe) - Convert to artist in residence
2019	Santa Fe Art Colong	(2345 S. Santa Fe) - Pad for SVE system installation

The subject property was developed for industrial use as early as 1916. Features associated with the former industrial activities include paint storage rooms, dry ovens, and an onsite incinerator.

Additional permits were on file for the subject property buildings; however, these permits were comprised of minor tenant improvements, electrical and roof permits, and sign permits and were not indicative of any environmental concerns.

4.4 Planning Department

On August 22, 2019, AEI contacted the Los Angeles Planning Department ZIMAS website for information on the subject property in order to identify AULs associated with the subject property.

AEI reviewed the ZIMAS database, which indicated that evidence indicating the existence of AULs was not on file for the subject property with the Los Angeles Planning Department.

4.5 County Assessor Office

On August 22, 2019, AEI contacted the Los Angeles County assessor's office website for information on the subject property in order to determine the earliest recorded date of development and use.

According to the Los Angeles County assessor's office, the current buildings were constructed in 1916 (three buildings), 1924, and 1953.

4.6 Oil and Gas Wells/Pipelines

On August 22, 2019, AEI reviewed the California Department of Conservation Division of Oil, Gas, and Geothermal Resources maps and the National Pipeline Mapping System (NPMS) Public Map Viewer concerning the subject property and nearby properties. The maps contain information regarding oil and gas development.

According to the California Department of Conservation Division of Oil, Gas, and Geothermal Resources map, oil or gas wells are not located within 500 feet of the subject property. AEI did not identify evidence of environmental concerns during the map review.

According to the NPMS Public Map Viewer, pipelines are not located within 500 feet of the subject property. AEI did not identify evidence of environmental concerns during the map review.

4.7 Other Agencies Searched

On August 22, 2019, AEI contacted the **South Coast Air Quality Monitoring District (SCAQMD)** for information regarding any records of PTO, NOV, or NTC issued to occupants of the subject property and associated with air emission equipment primarily related to stationary sources of air pollution, such as dry cleaning machines, boiler, and/or underground storage tanks.

- One PTO was listed for DC Enterprise for open spraying, dated 1993. No NOVs or NTCs were on file for the subject property.

On August 22, 2019, AEI accessed the **California Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System (HWTS)** online database for information pertaining to hazardous waste disposal associated with the subject property. The HWTS generates reports on hazardous waste shipments for generators, transporters, and treatment, storage or disposal facilities (TSDFs).

- The subject property is listed twice within the database. One listing is for the Santa Fe Art Colony at 2401 South Santa Fe Avenue and the second listing is for Van Vroman Plastics at 2345 South Santa Fe Avenue. Neither listing contains specific generator details or data.

On August 22, 2019 AEI accessed the **California Department of Toxic Substances Control (DTSC) EnviroStor database**, which contains information on investigation, cleanup, permitting, and/or corrective actions that are planned, being conducted or have been completed under DTSC oversight.

- No information indicating any release of hazardous materials from the subject property was found on the EnviroStor website.

On August 22, 2019, AEI accessed the **California State Water Resources Control Board (SWRCB) GeoTracker database**, a data management system for managing sites that impact groundwater, especially those requiring groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites.

- No information indicating any release of hazardous materials from the subject property was found on the GeoTracker website.

4.8 State Environmental Superliens and Property Transfer Laws

On August 22, 2019, the NETR Online Environmental Lien and AUL State Statuses website was visited to determine if the State of California has environmental superlien and/or property transfer laws which would allow environmental authorities the right to place a first priority lien on the subject property.

According to the NETR Online Environmental Lien and AUL State Statuses website, the State of California does not have environmental superlien and/or property transfer laws.

5.0 REGULATORY DATABASE RECORDS REVIEW

AEI contracted Environmental Data Resources, Inc. (EDR) to conduct a search of publicly available information from federal, state, tribal, and local databases containing known and suspected sites of environmental contamination and sites of potential environmental significance. Data gathered during the current regulatory database search is compiled by EDR into one regulatory database report. Location information for listed sites is designated using geocoded information provided by federal, state, or local agencies and commonly used mapping databases with the exception of "Orphan" sites. Due to poor or inadequate address information, Orphan sites are identified but not geocoded/mapped by EDR, rather, information is provided based upon vicinity zip codes, city name, and state. The number of listed sites identified within the approximate minimum search distance from the federal and state environmental records database listings specified in ASTM Standard E1527-13 is summarized in Section 5.1, along with the total number of Orphan sites. A copy of the regulatory database report is included in Appendix C of this report.

The subject property was identified in the regulatory database report as follows: HAZNET. See Section 5.1 for additional discussion.

In determining if a listed site is a potential environmental concern to the subject property, AEI generally applies the following criteria to classify the site as lower potential environmental concern: 1) the site only holds an operating permit (which does not imply a release), 2) the site's distance from, and/or topographic position relative to, the subject property, and/or 3) the site has recently been granted "No Further Action" by the appropriate regulatory agency.

5.1 RECORDS SUMMARY

Database	Search Distance (Miles)	Subject Property Listed	Number of Listings within Search Distance	Recognized Environmental Condition or Other Environmental Consideration (Yes or No)
NPL	1	No	0	
DELISTED NPL	0.5	No	0	
SEMS (formerly CERCLIS)	0.5	No	1	No, based on distance and/or direction relative to the subject property and/or regulatory status.
SEMS-ARCHIVE (formerly CERCLIS NFRAP)	0.5	No	6	No, based on distance and/or direction relative to the subject property and/or regulatory status.
RCRA CORRACTS	1	No	4	No, based on distance and/or direction relative to the subject property and/or regulatory status.
RCRA-TSDF	0.5	No	0	
RCRA LQG, SQG, CESQGs, VGN, NLR	SP/ADJ	No	3	No; three adjacent listings are further discussed below.
US ENG CONTROLS	SP	No	0	
US INST CONTROLS	SP	No	0	

Database	Search Distance (Miles)	Subject Property Listed	Number of Listings within Search Distance	Recognized Environmental Condition or Other Environmental Consideration (Yes or No)
ERNS	SP	No	0	
STATE/TRIBAL HWS	1	No	127	No; six adjacent property listings and four sites from the immediate vicinity are further discussed below.
STATE/TRIBAL SWLF	0.5	No	7	No, based on distance and/or direction relative to the subject property and/or regulatory status.
STATE/TRIBAL REGISTERED STORAGE TANKS	SP/ADJ	No	6	No; six adjacent listings are further discussed below.
STATE/TRIBAL LUST	0.5	No	15	No, based on distance and/or direction relative to the subject property and/or regulatory status.
STATE/TRIBAL EC and IC	SP	No	0	
STATE/TRIBAL VCP	0.5	No	3	No, based on distance and/or direction relative to the subject property and/or regulatory status.
STATE/TRIBAL BROWNFIELD	0.5	No	1	No, based on distance and/or direction relative to the subject property and/or regulatory status.
ORPHAN	N/A	No	6	No; none of the identified orphan sites are located in the immediate vicinity (500 feet) of the subject property with the exception of the one site further discussed below (2418 & 2420 South Santa Fe)
ADDITIONAL ENVIRONMENTAL RECORD SOURCES	SP/ADJ	No	19	No; one on-site listing and eighteen off-site listings are further discussed below.

Facility Name: Van Vrode Plastics
Database(s): HAZNET Address: 2345 South Santa Fe Avenue, Vernon, CA Distance: Subject Property Direction: N/A
Comments: The subject property is listed in the HAZNET database as disposing waste oil and mixed oil via an off-site recycling facility in 1984. There are no reported violations or releases associated with these waste generator activities; therefore, this listing does not represent an environmental concern to the subject property.

Facility Name: Former Exide Facility
Database(s): Area of Concern (AOCONCERN) Address: N/A Distance: 451 Feet Direction: South (hydrologically down-gradient)

Comments: The subject property is located within 500 feet of the boundary for the area of concern associated with the Former Exide site, which is a cleanup area of lead-impacted soil from aerially deposited lead, surrounding the former Exide Battery Recycling Plant. Since the subject property is outside of the AOCONCERN boundary, this listing is not considered an environmental concern for the subject property.

Facility Name: XCVI / First Nationwide Bank
Database(s): RCRA NonGen/NLR, ENVIROSTOR Address: 2309-2311 South Santa Fe Avenue Distance: Adjacent Direction: North (hydrologically up-gradient)
Comments: This north adjacent property is listed as a RCRA-NonGen/NLR as of 2013, under the name XCVI. The type of hazardous wastes generated is not provided in the information provided; however, it does indicate that there are no violations associated with the former hazardous waste generation activities at the site. This listing does not represent an environmental concern to the subject property. The property is listed within the ENVIROSTOR database under the name First Nationwide Bank, in association with a historical release case. The listed information indicates the case was associated with potential halogenated organic compounds, halogenated solvents and oil contamination within soil. The site screening, which was completed on November 30, 1993 indicates that soil sample results identified oil and grease-ranged petroleum hydrocarbons (TPH-o) concentrations ranged from 590 to 9,900 milligrams per kilogram (mg/kg) and tetrachloroethylene (PCE) concentrations ranged from 0.89 to 17.0 mg/kg in soil. Based on these results, the DTSC recommended that a Preliminary Endangerment Assessment (PEA) be completed. The PEA was completed and reviewed by DTSC; who indicated that the levels of contaminants observed were protective of human health and the environment, and recommended No Further Action was required. The case was granted closure on April 26, 1994. Based on the regulatory closure of this release, this listing does not represent an environmental concern to the subject property.

Facility Name: 2305 S Santa Fe Ave Site
Database(s): CPS-SLIC Address: 2305 South Santa Fe Avenue, Los Angeles Distance: Adjacent Direction: North (hydrologically up-gradient)
Comments: This north adjacent property is listed within the Cleanup Program Sites (CPS-SLIC) database (GeoTracker) as an active cleanup program site associated with a release of PCE, TCE, lead, nickel, other metals, and total petroleum hydrocarbons to soil, and soil vapor. According to results documented in two Phase II Environmental Site Assessment reports, concentrations of PCE and TCE in soil vapor were detected at the property above regional screening levels. A review of the site information on the GeoTracker website indicates a Phase 1 Environmental Site Assessment report (November 13, 2018), Phase II Subsurface Investigation report (December 2018) and Additional Phase II Subsurface Investigation report (January 2019) were submitted to the Los Angeles Regional Water Control Board (LARWCB) for review. The reports were prepared on behalf of City National Bank and JNJJ, LLC (Symphony Fashion Inc.). The LARWCB summarized the three reports as follows: • The Phase 1 report identified long-term industrial use during a pre-regulatory period (circa 1920-1970) and the associated historical activities, which included the use of two machine shops (circa 1955-1956 and Circa 1960-1970), a maintenance shop (circa 1960-1970), a knife manufacturing shop (1959), and a tow motor repair shop/area (circa 1949), as a REC.

- The December 2018 Phase II Subsurface Investigation report identified concentrations of tetrachloroethene (PCE) in six soil samples, one of which exceeded the San Francisco Regional Water Quality Control Board (SFRWQCB) Environmental Screening Level (ESL) for soil for a commercial/industrial use scenario of 2.7 mg/kg. Concentrations of trichloroethene (TCE) were non-detect in five soil samples and had a detection of 0.00208 milligrams per kilogram (mg/kg) in one soil sample.

  Concentrations of PCE (231 micrograms per liter [µg/L] to 453 µg/L) were detected in six soil vapor samples collected from five feet below ground surface (bgs). The concentration of PCE detected in the six soil vapor samples exceeded the RWQCB ESL established for PCE for a commercial/industrial use scenario of 2.1µg/L. Concentrations of trichloroethene (TCE) were detected in six soil vapor samples, one of which exceeded the RWQCB ESL established for TCE for a commercial/industrial use scenario of 3 µg/L. No other volatile organic compounds (VOCs) were detected in the soil vapor samples. The detected concentration of PCE indicated a human health risk from potential vapor intrusion.

- The January 2019 Additional Phase II Subsurface Investigation report identified one soil sample that had total lead concentrations that exceeded the expected upper background level, but were below the RWQCB screening level of 320 mg/kg for commercial use. Detected concentrations of all other metals were within the expected background levels when compared to soil in Southern California (Kearney Foundation Special Report, Background Concentrations of Trace and Major Elements in California Soils, 1996). Concentrations of total petroleum hydrocarbons (TPH) as oil were detected in four soil samples, all of which were below the RWQCB ESL of 140,000 mg/kg for commercial use. Low levels of PCE were detected in the 15-foot soil matrix samples. Low levels of PCE were detected in the 5-foot soil matrix samples, ranging from non-detect to 1.70 mg/kg (SB13-5). All concentrations of PCE in the soil matrix samples were below the RWQCB ESL for commercial use for PCE (2.7 mg/kg). PCE was detected in 5-foot soil vapor samples (51 to 361 ug/L) above the RWQCB ESL for commercial/ industrial use. Indoor air sampling indicated that PCE in indoor air (2.4 to 21 µg/ m^3) exceeded the RWQCB ESL for Commercial Use. Based on the result of soil vapor sampling and indoor air sampling, a vapor intrusion risk was identified for the property.

In May 2019, the Regional Board requested a staff toxicologist, specialist at the California Office of Environmental Health Hazard Assessment (OEHHA) review of the Additional Phase II. The summary and conclusions from the OEHHA memo are below:

- Estimated risks and hazards from construction workers' potential exposure to contaminants in soils were below typical worker thresholds.

- Estimated risks and hazards to indoor workers from contaminants in soil vapor were well above typical worker thresholds, primarily due to PCE. Predicted indoor TCE concentrations exceed the Urgent Action Level (UAL) and the Accelerated Action Level (AAL).

- Measured indoor air PCE concentrations were associated with risks at or below the threshold of 10^{-5}, with a hazard index of 0.12, less than the threshold of 1 and TCE concentrations below the AAL. These data apply only to the current building. Future construction may require re-assessment.

- Off-site residential risks and hazard estimates based on on-site soil vapor measurements were well above the residential threshold of 10^{-6}, with a hazard index above the residential threshold of 1. These are conservative (upper-bound) estimates and are likely to over-estimate the actual risks and hazards experienced by potentially exposed off-site residents.

- OEHHA recommended an additional round of indoor air sampling be conducted in a different season.

In a letter dated June 13, 2019, LARWCB requested a work plan for the additional round of indoor air sampling recommended by OEHHA. The requested work plan was submitted, and approved by LARWCB on July 1, 2019.

Facility Name: ACTA NORTH-PARCEL NE-024-SFGS
Database(s): CPS-SLIC (two listings), CERS Address: 2328 South Santa Fe Avenue Distance: Adjacent Direction: Northeast (hydrologically up- to cross-gradient)
Comments: The northeast adjacent parcel is listed within the CPS-SLIC database twice as a cleanup program site. The facility was evaluated as part of the Santa Fe Avenue grade separation and was granted no further on May 27, 2003 due to the low likelihood of impacts to the property. Based on the closed status of the former cases, the CPS-SLIC listings are not considered likely to represent a significant environmental concern for the subject property. The parcel is listed within the CERS database in association with the CPS-SLIC listings.

Facility Name: ACTA North - American Brass & Aluminum / American Brass & Aluminum
Database(s): CPS-SLIC, CERS, HAZMAT Address: 2400 South Santa Fe Avenue Distance: Adjacent Direction: East (hydrologically cross-gradient)
Comments: The northeast adjacent parcel is listed within the CPS-SLIC database twice as a cleanup program site. The facility was evaluated as part of the Santa Fe Avenue grade separation and was granted no further on July 5, 2002 due to the low likelihood of impacts to the property. Based on the closed status of the former cases, the CPS-SLIC listings are not considered to represent an environmental concern for the subject property. The parcel is listed within the CERS database in association with the CPS-SLIC listings. The facility is listed as an inactive hazardous materials permit site registered with the County of Los Angeles. No violations were identified in association with the listing.

Facility Name: 2414 South Santa Fe Avenue
Database(s): UST Address: 2414 South Santa Fe Avenue Distance: Adjacent Direction: East (hydrologically cross-gradient)
Comments: The east adjacent property is listed as formerly maintaining a UST. The parcel has since been redeveloped as part of the South Santa Fe Avenue grade separation project. Based on the lack of a documented release, the review of regulatory agency files for this site was not deemed necessary, and the site does not represent an environmental concern.

Facility Name: ACTA NORTH - PARCEL NE-028-SFGS
Database(s): CPS-SLIC, CERS, UST Address: 2418-2420 South Santa Fe Avenue Distance: Adjacent Direction: East (hydrologically cross-gradient)
Comments: The northeast adjacent parcel is listed within the UST database as historically maintaining an underground tank. The property is listed CPS-SLIC database as a cleanup program site. The facility was evaluated as part of the Santa Fe Avenue grade separation project and was granted no further on March 17, 2003 due to the low likelihood of impacts to the property. Based on the closed status of the former cases, the CPS-SLIC and UST listings do not represent an environmental concern for the subject property. The parcel is listed within the CERS database in association with the CPS-SLIC listing.

Facility Name: American Truck Body Works
Database(s): EDR Hist Auto Address: 2424 South Santa Fe Avenue Distance: Adjacent Direction: East (hydrologically cross-gradient)
Comments: The east adjacent parcel is listed within the EDR Hist Auto database as operating as an auto repair facility in 1937. No other listings are associated with the facility. Based on the lack of a documented release, the review of regulatory agency files for this site was not deemed necessary, and the site is not expected to represent an environmental concern.

Facility Name: Angelus Mill Supply
Database(s): SWEEPS UST, CA FID UST, NPDES, HAZMAT Address: 2417 East 25th Street Distance: Adjacent Direction: East (hydrologically cross-gradient)
Comments: The property is listed within the SWEEPS UST and CA FID UST databases as an inactive tank facility. The property is listed within the NPDES database as a recycling facility with an industrial stormwater permit. No violations were identified in association with the listing. The property is listed in the HAZMAT database as an inactive permit holder (Sam's Disposal Inc.) with the County of Los Angeles. Based on the lack of a documented release, the review of regulatory agency files for this site was not deemed necessary, and the site is not expected to represent an environmental concern.

Facility Name: Michael P. McCaffrey / M.P. McCaffrey, Inc. / M P McCaffrey Incorporated
Database(s): RCRA-SQG, FINDS, ECHO, HIST UST, NPDES, HAZMAT, CIWQS, CERS, SWEEPS UST, HIST UST, CA FID UST, WDS Address: 2121 East 25th Street Distance: Adjacent Direction: West (hydrologically cross-gradient)
Comments: The south adjacent facility is listed within the RCRA-SQG, FINDS, and ECHO databases as a small quantity generator of hazardous waste. The facility was first registered in 1993. No violations are associated with the listing. The facility is listed in the HIST UST (two listings), SWEEPS UST, and CA FID UST databases as formerly maintaining a 3,000-gallon unleaded fuel UST, a 3,575-gallon waste UST, a 500-gallon waste oil UST, and a 10,000-gallon diesel UST.

The facility is listed in the CERS database in association with chemical storage activities and the former USTs. Several administrative violations associated with business plan errors and training issues were noted in the CERS database; as of July 2019, all prior violations were returned to compliant status.

The facility is listed within the WDS, NPDES and CIWQS database as maintaining three terminated industrial stormwater permits. No violations are associated with the listings.

The facility is listed as maintaining an active hazardous materials permit with the County of Los Angeles. The permit is listed for Security Paving Company.

Based on the lack of a documented release, the review of regulatory agency files for this site was not deemed necessary, and the site is not expected to represent an environmental concern.

Facility Name: ACTA North- Parcel NE-022-SFGS
Database(s): CPS-SLIC (two listings), CERS Address: 2320 South Santa Fe Avenue Distance: 0.043-mile Direction: Northeast (hydrologically cross-gradient)
Comments: The facility is listed within the CPS-SLIC database twice as a cleanup program site. The facility was evaluated as part of the Santa Fe Avenue grade separation project and was granted no further action on May 20, 2003 due to the low likelihood of impacts to the property. The CERS listing is associated with the CPS_SLIC listings. Based on the closed status of the former case, and its cross-gradient location, the CPS-SLIC and CERS listings are not considered likely to represent a significant environmental concern for the subject property.

Facility Name: ACTA North K&K Apparel
Database(s): CPS-SLIC, CERS Address: 2300 South Santa Fe Avenue Distance: 0.062-mile Direction: Northeast (hydrologically cross-gradient)
Comments: The facility is listed within the CPS-SLIC database as a cleanup program site. The facility was evaluated as part of the Santa Fe Avenue grade separation project and was granted no further action on July 25, 2002 due to the low likelihood of impacts to the property. The CERS listing is associated with the CPS_SLIC listing. Based on the closed status of the former case, and its cross-gradient location, the CPS-SLIC and CERS listings are not considered likely to represent an environmental concern for the subject property.

Facility Name: Chair Factory, Inc.
Database(s): HAZMAT, LA Co. Site Mitigation Address: 2315 South Santa Fe Avenue Distance: 0.064-mile Direction: North-northeast (hydrologically cross-gradient)
Comments: The facility is listed within the LA Co. Site Mitigation database as a former release case. According to the database listing, the site was abated on July 1, 1991. No further information was provided pertaining to the release listing. Based on the distance and closed case status, this listing is not considered likely to represent a significant environmental concern for the subject property.

The HAZMAT listing indicates the site is an inactive site under Facility ID No. FA0008993. This listing is not expected to represent an environmental concern to the subject property.

5.2 VAPOR MIGRATION

AEI reviewed reasonably ascertainable information for the subject and nearby properties, including a regulatory database, files for nearby release sites, and/or historical documentation, to determine if potential vapor-phase migration concerns may be present which could impact the subject property.

Based on a review of available resources as documented in this report, chloinated solvents, including PCE are present in sub-slab soil vapor as well as indoor air at the subject property; however, steps have been taken to address the concern, including a sub-slab vapor extraction system installed in May 2019 at the subject property. Details pertaining to the extraction system are further discussed in Section 6.3.

6.0 INTERVIEWS AND USER PROVIDED INFORMATION

6.1 INTERVIEWS

Pursuant to ASTM E1527-13, the following interviews were performed during this assessment in order to obtain information indicating RECs in connection with the subject property.

6.1.1 INTERVIEW WITH OWNER

The subject property owner was not interviewed during this assessment. Based on information obtained from other sources, including the key site manager, this limiting condition is not expected to alter the overall findings of this assessment.

6.1.2 INTERVIEW WITH KEY SITE MANAGER

The key site manager, Ms. Danielle Williams, Community Director of the Santa Fe Art Colony, was interviewed in person on August 30, 2019. Ms. Williams has been associated with the subject property since approximately 2018. and stated that there is no large scale hazardous materials use at the property. Ms. Williams indicated that there have been prior assessments and investigations conducted at the subject property and that a Soil Vapor Extraction system operates on site. Ms. Williams was asked if she was aware of any of the following:

	Yes	No
Any knowledge of USTs, clarifiers or oil/water separators, sumps, or other subsurface features.		✔
Any knowledge of previous environmental investigations conducted on site.	✔	
Any knowledge of current or past industrial operations and/or other operations which would involve the use of hazardous substances and/or petroleum products.		✔
Any known plans for site redevelopment or change in site use.		✔
Any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property.		✔
Any pending, threatened or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the property.		✔
Any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.		✔
Any incidents of flooding, leaks, or other water intrusion, and/or complaints related to indoor air quality.		✔
Comments: Previous assessments and investigations have been conducted on site, and a soil vapor extraction/ sub-slab depressurization system currently operates at the subject property. Details pertaining to the assessments are included in Section 6.3.		

6.1.3 PAST OWNERS, OPERATORS, AND OCCUPANTS

AEI did not attempt to interview past owners, operators, and occupants of the subject property because information from these sources would likely be duplicative of information already obtained from other sources.

6.1.4 Interview with Others

Information obtained during interviews with local government officials is incorporated into the appropriate segments of this section.

6.2 User Provided Information

User provided information is intended to help identify the possibility of RECs in connection with the subject property. According to ASTM E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), certain items should be researched by the prospective landowner or grantee, and the results of such inquiries may be provided to the Environmental Professional. The responsibility for qualifying for LLPs by conducting the inquiries ultimately rests with the User, and providing the information to the Environmental Professional would be prudent if such information is available.

The User did not complete the ASTM User Questionnaire or provide the User information to AEI. AEI assumes that qualification for the LLPs is being established by the User in documentation outside of this assessment.

6.3 Previous Reports and Other Provided Documentation

Documentation was provided to AEI by the report User during this assessment. A summary of this information follows:

Freddie Mac Multi-Family Environmental Report, prepared by Consulting Solutions Inc. (April 26, 2017)

Consulting Solutions, Inc. (CSI) conducted a Phase I ESA at the subject property in conformance with ASTM E1527-13 and the Freddie Mac Guidelines. The assessment included a site reconnaissance, interviews, historical records review, agency records review, and regulatory database radius review.

At the time of the assessment, CSI described the subject property as five buildings that appear to have been constructed as various warehouses / commercial occupants since the early 1900's. In 1985 four of the five buildings were converted to residential units. The buildings are identified as 2415, 2421, 2349 and 2401 and have a total of 57 dwelling units of various sizes. A management office and maintenance shop are located at the subject as part of Building 2349. An additional building, Building 2345, is a 20,200 square foot building leased for warehousing. Asphalt parking and drives are present, with 100 open spaces. Entry to the parking for the subject is controlled by an access gate. Landscaping is minimal but is well developed, consisting of mature grass, trees and shrubs.

CSI identified one REC based on the past industrial use of the property, which included the C.B. Van Vorst Furniture & Mattress Manufacturing Factory which utilized metal molding and painting operations, a Firestone Tire and Rubber Co Manufacturing facility, the Young Spring & Wire Corp. Flexolator Products Manufacturing facility, California Moulding Co, Windsor Art Products Inc., Terry Tuck Inc., and a rail spur line which once served the property. CSI noted that the time frame during which the industrial / manufacturing operations were occurring (1920's-1970's) was prior to the establishment of many environmental regulations regarding chemical and waste

disposal, raising the concern that hazardous wastes may have been improperly disposed of on site; additionally, no prior environmental assessments of
the property were obtained to eliminate the possibility of potential contamination on site.

CSI also identified potential asbestos-containing materials, lead-based paint, moisture management, and PCB transformers as business environmental risks.

Based on their findings, CSI recommended a Phase II Environmental Site Assessment be conducted at the subject property; and also recommended implementation of asbestos and lead-based paint operations * maintenance programs, a moisture management plan, and a PCB transformer operations and maintenance plan.

Phase II Environmental Site Assessment, 2345 South Santa Fe Avenue, prepared by EFI Global (May 24, 2017)

EFI Global (EFI) conducted a Phase II Environmental Site Assessment at the subject property. According to EFI's report, the property was historically utilized by a number of industrial occupants since the early 1900s, during a period that preceded environmental oversight. Furthermore, EFI determined that the historical uses typically involved the use of metals and other hazardous materials, including chlorinated solvents.

As part of the assessment, EFI conducted a geophysical survey of the subject property to clear 20 soil boring locations. On May 4 and 5, 2017, EFI directed Optimal Technology (Optimal) to conduct a soil vapor survey throughout the site to evaluate for the presence of VOCs in the subsurface. A total of 30 soil vapor samples were collected (B1-SV-5 through B30-SV-5) and two duplicate samples (B16-SV-5 Dup and B30-SV-5 Dup) were evaluated. All probes were set at approximately 5 feet bgs.

Soil borings B1-B4, B10, B11, B17-B19, and B25-B30 were advanced in the exterior areas of the property. Borings B5 and B6 were advanced within the 2349 residential structure; borings B7-B9 were advanced within the basement of the 2401 residential structure; borings B12-B14 were advanced within the 2415 residential structure; borings B15 and B16 were advanced within the 2421 residential structure, and borings B20-B24 were advanced within the 2345 commercial warehouse structure. All soil vapor samples were immediately analyzed in an on-site mobile laboratory for VOCs by Modified EPA Method 8021B.

Soil samples were collected at locations B21 and B23, the two locations with the highest VOCs in soil vapor concentrations. The soil samples were analyzed by an off-site laboratory for Title 22 (CAM 17) Metals by EPA Methods 6010B/7471A (2-foot soil samples) or for VOCs by EPA Method 8260B (5-foot soil samples). Detectable concentrations of VOCs in soil were not present in the five-foot bgs soil samples (B21-S-5 and B23-S-5) collected at the Site. Therefore, VOCs in soil, including PCE, do not appear to be of significant concern at the Site in the areas tested.

Tetrachloroethene (PCE) was detected at the subject property in all 30 soil vapor samples and 2 duplicates up to a maximum residential-area concentration of 155.78 micrograms per liter (µg/L) adjacent to the north of the 2349 building, and a maximum commercial-area

concentration of 205.14 µg/L detected within the 2345 commercial warehouse building. TCE was detected in 16 soil vapor samples (but neither duplicate sample), at maximum residential-area concentration of 0.61 µg/L within the basement of the 2401 residential building and a maximum commercial-area concentration of 0.72 µg/L within the 2345 commercial warehouse building. All PCE concentrations exceeded the residential and commercial screening levels. Additionally, several residential-area TCE concentrations exceeded residential screening levels.

EFI ran a Johnson and Ettinger (J&E) model for each on-site soil vapor scenario. EFI determined that the on-site buildings had potentially unacceptable carcinogenic risks for vapor intrusion.

With the exception of arsenic, all metals detected in shallow soil were found below their respective CHHSLs for commercial properties. Lead and arsenic were detected above the CHHSLs for residential properties. No VOCs were detected in soil.

EFI recommended further site characterization, including further assessment of vapor intrusion conditions, attempts to identify an on-site source of VOCs, and additional sampling for metals at the subject property.

Phase I Environmental Site Assessment, Santa Fe Art Colony, 2345, 2349, 2401, 2415, and 2421 South Santa Fe Avenue, prepared by EBI Consulting (June 15, 2017)

EBI Consulting (EBI) conducted a Phase I ESA at the subject property in general accordance with ASTM E1527-13. The assessment included a site reconnaissance, interviews, historical records review, agency records review, and regulatory database radius review.

EBI described the subject property as rectangular-shaped parcel, totaling approximately 3.38 acres. At the time of assessment, the Subject Property was occupied by 57 live-work units and a warehouse, comprising the Santa Fe Art Colony. The Subject Property was improved with a five building complex including one two-story building, and four single-story buildings. There is a basement present beneath the two-story structure. The existing improvements were constructed between 1916 and 1953. There are currently no manufacturing or industrial operations conducted at the Subject Property.

Historical resources indicated that the Subject Property was developed in 1916 for commercial / industrial operations and was used for furniture manufacturing, moulding fabrication, foam mattress products, a Firestone Tire and Rubber Company manufacturing facility, clothing assembly and warehousing through the 1970s. The Santa Fe Art Colony has occupied the subject property since 1986.

The findings of EBI's assessment were generally consistent with the 2017 CSI Phase I ESA. EBI identified the historical industrial use of the subject property as a REC and recommended a that a limited subsurface investigation be conducted in order to determine whether the historical use of the Subject Property has adversely impacted environmental conditions at the property. EBI also recommended asbestos and lead-based paint operations and maintenance plans.

Soil Vapor Extraction and Treatment System Startup Report, prepared by AEI Consultants (May 15, 2019)

This report summaries the start-up operations of a soil vapor extraction and treatment (SVET) system that was installed at the subject property to mitigate the onsite indoor air quality impacted by PCE from the adjacent property to the north. The system was installed based on the EFI Phase II Investigations results and an additional indoor air quality survey conducted by The Source Group, Inc. (SGI), in August 2017 which indicated that PCE was present in indoor air that exceeded the Department of Toxic Substance Control (DTSC) residential screening level for PCE of 0.46 µg/m^3 and the commercial screening level of 2.0 µg/m^3. The source of the PCE is the adjacent property to the north.

The SVET system includes the following components:

- Soil vapor is extracted from beneath the on-site buildings using 11 horizontal wells advanced beneath the on-site buildings which are connected to five conveyance lines, one for each building, that are run to the treatment system compound.

- Soil vapor is extracted with a 10-horsepower vacuum blower, capable of up to 300 cubic feet per minute. Entrained liquids are separated from the vapor steam in a knockout tank.

- The extracted soil vapor is treated with two 1,000-pound granular activated carbon (GAC) vessels connected in series, prior to the blower.

- The extracted and treated vapors are discharged to the atmosphere through an exhaust stack with a minimum height of 10-feet, with a rain cap (AQMD Permit Condition 19).

- Pressure, flow, and temperature gauges are located at select locations within the system.

The SVET system was started on April 1, 2019, and operation and maintenance activities were performed on a weekly basis since April 8, 2019. Influent and effluent concentrations were monitored according to AQMD permit requirements. Influent and effluent samples were collected on April 4, 2019 for laboratory analysis, the results of which are summarized below.

- PCE was detected in the influent vapor sample at a concentration of 700 micrograms per cubic meter (µg/m^3), and in the effluent vapor sample at a concentration of 670 µg/m^3.

- TCE was detected only in the effluent vapor sample, observed at a concentration of 5.1 µg/m^3.

- Total VOCs, measured as hexane, was reported for the influent vapor sample at a concentration of 13,000 µg/m^3, but were not detected in the effluent sample.

The SVET system at the subject property continues to be operated, maintained, and monitored, and is being adjusted for optimal performance.

Copies of the reports are included in the appendices.

Note: If the above documentation was not prepared by AEI, the information obtained was not verified for accuracy and a critique of the information contained therein is beyond the scope of this assessment.

7.0 SITE RECONNAISSANCE

Site Reconnaissance Date	August 30, 2019
AEI Site Assessor(s)	Devina Horvath
Property Escort(s)/Relationship(s) to Property	Danielle Williams / manager
Units/Areas Observed	Representative portions of the interiors of the five buildings on site including common areas, restrooms, laundry room, maintenance room, and units 2349 D and 2401 - 201 (approximately 8% of total units) as well as the exterior common areas of the subject property, SVE system compound, and parking areas.
Area(s) not accessed and reason(s)	Remaining units due to tenant occupany
Weather	Sunny and clear

7.1 SUBJECT PROPERTY RECONNAISSANCE FINDINGS

Yes	No	Observation
	✔	Regulated Hazardous Substances/Wastes and/or Petroleum Products in Connection with Property Use
	✔	Aboveground Hazardous Substance or Petroleum Product Storage Tanks (ASTs)
	✔	Underground Hazardous Substance or Petroleum Product Storage Tanks (USTs)
	✔	Hazardous Substance and Petroleum Product Containers Not in Connection with Property Use
	✔	Unidentified Substance Containers
✔		Electrical or Mechanical Equipment Likely to Contain Fluids
	✔	Interior Stains or Corrosion
	✔	Strong, Pungent, or Noxious Odors
	✔	Pools of Liquid
✔		Drains, Sumps, and Clarifiers
	✔	Pits, Ponds, and Lagoons
✔		Stained Soil or Pavement
	✔	Stressed Vegetation
	✔	Solid Waste Disposal or Evidence of Fill Materials
	✔	Waste Water Discharges
✔		Wells
	✔	Septic Systems
	✔	Biomedical Wastes
	✔	Dry Cleaners
✔		Other

The subject property is currently occupied by the Santa Fe Art Colony. On-site operations consist of residential live-work artist studios in four of the buildings and warehousing/storage in the fifth building.

UNIDENTIFIED SUBSTANCE CONTAINERS

Two unmarked 55-gallon drums containing solid materials were observed along the central-western property boundary during the site inspection. According to AEI personnel, the drums were present since prior to the on-site SVE system installation. The drums were in good condition with no apparent stains or spills. The drums were stored directly upon asphalt pavement. AEI performed waste characterization sampling and subsequently disposed of the drums off site at a licensed disposal facility. No other action is required.

ELECTRICAL OR MECHANICAL EQUIPMENT LIKELY TO CONTAIN FLUIDS

Toxic PCBs were commonly used historically in electrical equipment such as transformers, fluorescent lamp ballasts, and capacitors. According to United States EPA regulation 40 CFR Part 761, there are three categories for classifying such equipment: <50 ppm of PCBs is considered "Non-PCB"; between 50 and 500 ppm is considered "PCB-Contaminated"; and >500 ppm is considered "PCB-Containing". Pursuant to 15 U.S.C. 2605(e)(2)(A), the manufacture, process, or distribution in commerce or use of any polychlorinated biphenyl in any manner other than in a totally enclosed manner was prohibited after January 1, 1977.

Transformers

Type	Quantity	Owner	Presumed Date of Installation	Spills or Stains Observed (Yes/ No)	Non-PCB Label (Yes/ No)
Pole-Mounted	6	Los Angeles Department of Water and Power	Post 1980 (based on observations)	No	No

The management of potential PCB-containing transformers is the responsibility of the local utility or the transformer owner. Actual material samples need to be collected to determine if transformers are PCB-containing.

Transformers installed prior to 1977 may be PCB containing while transformers installed after 1977 are unlikely to be PCB containing. Federal Regulations (40 CFR 761 Subpart G) require any release of material containing >50 ppm PCB and occurring after May 4, 1987, be cleaned up by the transformer owner following the United States EPA's PCB spill cleanup policy.

AEI did not observe evidence of spills, staining, or leaks on or around the transformers. Based on the good condition of the equipment, the transformers are not expected to represent a significant environmental concern.

Elevators

The subject property building located at 2401 South Santa Fe Avenue is equipped with a hydraulic elevator. The hydraulic fluid contained within elevator systems can potentially contain toxic PCBs. Based on the construction date of the building (pre-1978), the potential exists that hydraulic fluid within the equipment may have contained PCBs.

The equipment room for the elevator, which is located in the basement area of the 2401 building, and was not accessible during AEI's site reconnaissance. The elevator is reportedly maintained by Performance Elevators. Based on the regular maintenance of the equipment, the elevator is not expected to represent a significant environmental concern.

DRAINS, SUMPS, AND CLARIFIERS

A large trench drain was observed in the accessway in the central portion of the property in the footprint of the former railroad spur. AEI did not observe evidence of hazardous substances or petroleum products in the vicinity of the drain. Based on the use of the drain solely for storm water runoff, the presence of the drain is not expected to represent a significant environmental concern.

STAINED SOIL AND PAVEMENT

Minor amounts of oily surface staining were observed in the parking area. The staining appears to be from leaking vehicles and is surficial in nature. Based on the small size and the surficial nature of the staining, it is not expected to represent a significant environmental concern.

WELLS

Multiple soil vapor extraction wells were observed across the subject property in association with the active SVET system. The system is further discussed in Section 6.3. A map of the wells is included with the SVET installation report in the Appendices.

OTHER

The subject property is currently occupied by residential and art studio tenants. Small amounts of cleaning supplies, paints, and oxygenated solvents were observed on site. All materials were packaged in consumer quantities and no signs of inappropriate material handling were observed. Based on the nature of these materials, the presence or use of these materials at the subject property is not expected to represent a significant environmental concern.

7.2 ADJACENT PROPERTY RECONNAISSANCE FINDINGS

Yes	No	Observation
	✔	Hazardous Substances/Wastes and/or Petroleum Products in Connection with Property Use
	✔	Aboveground Hazardous Substance or Petroleum Product Storage Tanks (ASTs)
	✔	Underground Hazardous Substance or Petroleum Product Storage Tanks (USTs)
	✔	Hazardous Substance and Petroleum Product Containers Not in Connection with Property Use
	✔	Unidentified Substance Containers
	✔	Electrical or Mechanical Equipment Likely to Contain Fluids
	✔	Strong, Pungent, or Noxious Odors
	✔	Pools of Liquid
	✔	Drains, Sumps, and Clarifiers
	✔	Pits, Ponds, and Lagoons

Yes	No	Observation
	✔	Stained Soil or Pavement
	✔	Stressed Vegetation
	✔	Solid Waste Disposal or Evidence of Fill Materials
	✔	Waste Water Discharges
	✔	Wells
	✔	Septic Systems
	✔	Dry Cleaners
	✔	Other

8.0 OTHER ENVIRONMENTAL CONSIDERATIONS

8.1 ASBESTOS-CONTAINING BUILDING MATERIALS

Asbestos is the name for a group of naturally occurring silicate minerals that can be separated into fibers. The fibers are strong, durable, and resistant to heat and fire. They are also long, thin and flexible, so they can even be woven into cloth. Because of these qualities, asbestos has been used in thousands of consumer, industrial, maritime, automotive, scientific and building products. During the 20th century, some 30 million tons of asbestos have been used in industrial sites, homes, schools, shipyards and commercial buildings in the United States. Commercial use of ACM began in the early 1900s and peaked in the period between 1940 and into the 1970's. Common ACMs include pipe-covering, insulating cement, insulating block, refactory and boiler insulation materials, transite board, fireproofing spray, joint compound, vinyl floor tile, ceiling tile, mastics, roofing products, and duct insulation for HVAC applications. Inhalation of asbestos fibers can result in deleterious health effects.

The potential for ACM was evaluated based the United States EPA Guidance Document: *Managing Asbestos in Place - A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials* ("Green Book"). In 1973, NESHAPS banned the use of most spray-applied surfacing ACM, specifically asbestos containing spray-on fireproofing and insulation. Subsequent revisions to this regulation in 1975 and 1978 effectively eliminated the use of friable pre-molded pipe, boiler, turbine, and duct insulation; and the spray application of friable asbestos-containing materials for all uses in buildings. In 1989, the EPA issued regulations to ban some asbestos-containing products and phase out most others over a multi-year period. The "Ban and Phase-Down" rule was challenged in court and the regulation remanded to the agency. As a result, any asbestos-containing products then "in commerce" would not be banned. Those not in commerce would be banned. Those materials "banned" could not be sold. It did not affect such materials already installed, or in use. Most United States firms voluntarily ceased production of asbestos containing building materials not covered by the aforementioned Federal bans by the mid-1980s. In 1994, the OSHA determined that employers and building owners are required to treat installed thermal system installation and sprayed on and troweled-on surfacing materials, as well as vinyl or asphalt flooring material, as ACM in buildings constructed no later than 1980 until tested by laboratory analysis to prove otherwise.

The information below is for general informational purposes only and does not constitute an asbestos survey. In addition, the information is not intended to comply with federal, state or local regulations in regards to ACM.

Based on the Green Book, the Ban and Phase-Down rule and the 1916 (three buildings), 1924, and 1953 dates of construction, building materials may contain asbestos. According to the EPA, while suspect or presumed ACM may be managed in place under an operations and maintenance program, sampling would be required to document the presence or absence of asbestos-containing material. A summary of suspect or presumed ACM is provided below.

Material	Location	Estimated Quantity	Friable (Yes/No)	Physical Condition	Action
Drywall systems	Throughout building interiors	>10,000 sf	No	Good	O&M

Material	Location	Estimated Quantity	Friable (Yes/No)	Physical Condition	Action
Insulation and pipe coating	Throughout building interiors within wall space	>10,000 sf	Yes	Good	O&M
Roofing Materials	Building roofs	>10,000 sf	No	Good	O&M

Based on the age of the buildings, asbestos may be present in the building material. Building materials were in good condition and can be effectively managed as part of an asbestos O&M Plan until such time as renovation or demolition activities necessitate their removal. An O&M Plan was not in place at the subject property.

8.2 LEAD-BASED PAINT

Lead-based Paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has ≥1 mg/cm² (5,000 µg/g or 5,000 ppm) or more of lead by federal guidelines; state and local definitions may differ from the federal definitions in amounts ranging from 0.5 mg/cm² to 2.0 mg/cm². Section 1017 of the Housing and Urban Development (HUD) Guidelines, Residential Lead-Based Paint Hazard Reduction Act of 1992, otherwise known as "Title X", defines a LBP hazard as "any condition that causes exposure to lead that would result in adverse human health effects" resulting from lead-contaminated dust, bare, lead-contaminated soil, and/or lead-contaminated paint that is deteriorated or present on accessible, friction, or impact surfaces. Therefore, under Title X, intact LBP on most walls and ceilings would not be considered a "hazard", although the paint should be maintained and its condition monitored to ensure that it does not deteriorate and become a hazard. Additionally, Section 1018 of this law directed HUD and EPA to require the disclosure of known information on LBP and LBP hazards before the sale or lease of most housing built before 1978. Most private housing, public housing, or federally owned or subsidized housing is affected by this rule.

LBP is defined as any paint with any detectable amount of lead present in it. It is important to note that LBP may create a lead hazard when being removed. The condition of these materials must be monitored when they are being disturbed. In the event LBP is subject to abrading, sanding, torching, and/or cutting during demolition or renovation activities, there may be regulatory issues that must be addressed.

The information below is for general informational purposes only and does not constitute a lead hazard evaluation. In addition, the information is not intended to comply with federal, state, or local regulations in regards to LBP.

In buildings constructed after 1978, it is unlikely that LBP is present. Structures built prior to 1978 and especially prior to the 1960s should be expected to contain LBP.

Due to the date of construction (pre-1978), lead-based paint may be present. All painted surfaces were observed to be in good condition with no chalking, peeling or flaking. Since the subject property is used for residential use, AEI recommends the development of a Lead Based Paint Operations and Maintenance (O&M) Plan along with the appropriate notification of occupants until testing is performed to document the absence of lead based paint.

8.3 RADON

Radon is a naturally-occurring, odorless, and invisible gas. Natural radon levels vary and are closely related to geologic formations. Radon may enter buildings through basement sumps or other openings.

The United States EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three radon zones, with Zone 1 being those areas with the average predicted indoor radon concentration in residential dwellings exceeding the EPA Action Limit of 4.0 pCi/L. It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the EPA recommends site specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not requested as part of this assessment. According to the US EPA, the radon zone level for the area is Zone 2, which has a predicted average indoor screening level between 2 pCi/L and 4 pCi/L, equal to or below the action level of 4 pCi/L set forth by the US EPA.

8.4 DRINKING WATER SOURCES AND LEAD IN DRINKING WATER

The City of Los Angeles Department of Water and Power supplies potable water to the subject property. The most recent water quality report (2018) states that the 90th percentile value for lead levels in samples obtained from the area's water supply was 0.22 µg/L. Zero samples out of a total of 57 samples had lead levels exceeding the regulatory action level. Typical sources of lead in drinking water include corrosion of household plumbing systems. Overall, lead levels are well within standards established by the United States EPA.

8.5 MOLD

Molds are simple, microscopic organisms, which can often be seen in the form of discoloration, frequently green, gray, white, brown, or black. When excessive moisture or water accumulates indoors, mold growth will often occur, particularly if the moisture problem remains undiscovered or is not addressed. As such, interior areas of buildings characterized by poor ventilation and high humidity are the most common locations of mold growth. Building materials including drywall, wallpaper, baseboards, wood framing, insulation, and carpeting often play host to such growth. Mold spores primarily cause health problems through the inhalation of mold spores or the toxins they emit when they are present in large numbers. This can occur primarily when there is active mold growth within places where people live or work.

Mold, if present, may or may not visually manifest itself. Neither the individual completing this inspection, nor AEI has any liability for the identification of mold-related concerns except as defined in applicable industry standards. In short, this Phase I ESA should not be construed as a mold survey or inspection.

AEI observed interior areas of the subject property buildings to identify the potential presence of mold. AEI did not note obvious visual or olfactory indications of the presence of mold, nor did AEI observe obvious indications of significant water damage. As such, no bulk sampling of

suspect surfaces was conducted as part of this assessment and no additional action with respect to suspect mold appears to be warranted at this time.This activity was not designed to discover all areas which may be affected by mold growth on the subject property. Rather, it is intended to give the client an indication if significant (based on observed areas) mold growth is present at the subject property. Additional areas of mold not observed as part of this limited assessment, possibly in pipe chases, HVAC systems, and behind enclosed walls and ceilings, may be present on the subject property.

9.0 FINDINGS, OPINIONS AND CONCLUSIONS

9.1 FINDINGS

9.1.1 RECOGNIZED ENVIRONMENTAL CONDITIONS

Recognized Environmental Condition (REC) is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to 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.

This assessment has revealed no evidence of RECs in connection with the subject property,

9.1.2 CONTROLLED RECOGNIZED ENVIRONMENTAL CONDITIONS

Controlled Recognized Environmental Condition (CREC) is defined by the ASTM Standard Practice E1527-13 as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

This assessment has revealed no evidence of CRECs in connection with the subject property.

9.1.3 HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITIONS

Historical Recognized Environmental Condition (HREC) is defined by the ASTM Standard Practice E1527-13 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 any required controls.

This assessment has revealed no evidence of HRECs in connection with the subject property.

9.1.4 OTHER ENVIRONMENTAL CONSIDERATIONS (NON-ASTM SCOPE)

Other Environmental Considerations include, but are not limited to, de minimis conditions and/ or business environmental risks such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in the ASTM Standard. These may also affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the subject property.

The following related issues of concern were identified:

- In 2017, soil vapor was identified at the Property. While PCE and TCE were detected in the soil vapor, soil samples indicate that the property was not the source. Based on concentration gradients it was demonstrates that the source was from the adjacent property to the north (2305 South Santa Fe Avenue). To mitigate the indoor air impacts from the adjacent site, a soil vapor extraction and treatment (SVET) system was installed at the subject property by AEI in 2019. The SVET system began operating in April 2019, and continues to be operated, maintained, monitored, and adjusted for optimal performance. No further action other than continued operation of the SVET is warranted at this time.
- Asbestos - Based on the age of the buildings, asbestos may be present in the building material. Building materials were in good condition and can be effectively managed as part of an asbestos Operations and Maintenance (O&M) Plan.

- Lead-based Paint - Based on the age of the buildings, lead-based paint may be present. All painted areas were in good condition, with no chalking or peeling, and can be effectively managed as part of a lead-based paint Operations and Maintenance (O&M) Program.

9.2 CONCLUSIONS

AEI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of 2345 South Santa Fe Avenue, Los Angeles, Los Angeles County, California, the Property. Any exceptions to or deletions from this practice are described in Section 1.5 of this report.

This assessment has revealed no evidence of RECs or CRECs in connection with the subject property.

Other Environmental Considerations include, but are not limited to, de minimis conditions and/ or business environmental risks such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in the ASTM Standard. These may also affect the liabilities and financial obligations of the client, the health and safety of site occupants, and the value and marketability of the subject property.

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- Lead-based Paint - Based on the age of the buildings, lead-based paint may be present. All painted areas were in good condition, with no chalking or peeling, and can be effectively managed as part of a lead-based paint Operations and Maintenance (O&M) Program.

10.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR Part 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 40 CFR Part 312.

Prepared By:	Reviewed By:
Devina Horvath	
Devina Horvath Associate Consultant	David Grupp Senior Author

11.0 REFERENCES

Item	Date(s)	Source
Soils Information	August 22, 2019	USDA Web Soil Survey http://websoilsurvey.nrcs.usda.gov/ app/WebSoilSurvey.aspx
Topographic Map	1981	USGS
Depth to Groundwater Information	August 22, 2019	GeoTracker (http://geotracker.waterboards.ca.gov)
Wetlands Information	August 22, 2019	Wetlands Mapper (https://www.fws.gov/wetlands/data/ mapper.html)
Flood Zone Information	August 22, 2019	FEMA (https://msc.fema.gov)
Aerial Photographs	1923-2016 (non-inclusive)	NETR Online (www.historicaerials.com)
Sanborn Map Report/Search	1920-1970 (non-inclusive)	EDR
City Directories	1917-2014 (non-inclusive)	EDR and Los Angeles Public Library
Historical Topographic Maps	1894-1981 (non-inclusive)	USGS
Environmental Health Department/State Environmental Agency	August 22, 2019	Los Angeles County Department of Public Health
Fire Department	August 22, 2019	Los Angeles Fire Department
Building Department	August 22, 2019	Los Angeles Department of Building and Safety
Planning Department	August 22, 2019	Los Angeles Planning Department
Assessor's Information and Parcel Map	August 22, 2019	Los Angeles County assessor's office
Oil and Gas Wells/Pipelines	August 22, 2019	California Department of Conservation Division of Oil, Gas, and Geothermal Resources and NPMS Public Map Viewer https://www.npms.phmsa.dot.gov/ PublicViewer/composite.jsf
Other Agencies Searched	August 22, 2019	CalEPA Regulated Site Portal (https://siteportal.calepa.ca.gov/nsite), GeoTracker, DTSC Envirostor (https://siteportal.calepa.ca.gov/nsite), DTSC HWTS (https://hwts.dtsc.ca.gov), and SCAQMD FIND (https://xappprod.aqmd.gov/find)
State Environmental Superliens / Property Transfer Laws	August 22, 2019	NETR Online Environmental Lien and AUL State Statuses website http://environmental.netronline.com/ lienStatutes.aspx
Regulatory Database Report	August 23, 2019	EDR
Interview with Key Site Manager	August 30, 2019	Ms. Danielle Williams

Item	Date(s)	Source
Previous Report	April 26, 2017	*Freddie Mac Multi-Family Environmental Report, Santa Fe Art Colony, 2345 South Santa Fe Avenue*, prepared by Consulting Solutions Inc.
Previous Report	May 24, 2017	*Phase II Environmental Site Assessment Report, 2345 South Santa Fe Avenue, Vernon, CA 90058* prepared by EFI Global
Previous Report	June 15, 2017	*Phase I Environmental Site Assessment, Santa Fe Art Colony, 2345, 2349, 2401, 2415, and 2421 South Santa Fe Avenue,*prepared by EBI Consulting
Previous Report	May 15, 2019	*Soil Vapor Extraction and Treatment System Startup Report,* prepared by AEI Consultants
Radon Zone Information	1993	US EPA Map of Radon Zones https://www.epa.gov/radon
Water Quality Report	2018	City of Los Angeles Department of Water and Power

EXHIBIT C

Suns Trading Letter

three6ixty

SUNS
TRADING

2345 S. Santa Fe Ave.
Los Angeles , CA 90058
(323)583-8100
jason@sunstrading.com

Dear Mr. Garcia,

I, unfortunately, couldn't make the zoning administrator hearing yesterday but I understand there were some questions as to whether the loft conversion of the warehouse building (that my company currently occupies) would displace viable industrial uses or lessen the likelihood that the property will be available in the future for industrial uses. I plan to move my business, and would do so regardless of the proposed conversion. Here is a summary of reasons why we are looking to move from the warehouse that I thought you should be aware of:

1. **Unideal Location** - We have always had issues with our truck drivers finding our warehouse for deliveries and for pick-ups because the warehouse is housed within the larger art colony. More often than not drivers will get lost trying to find our entrance and this causes many issues operationally. This applies to customers finding us as well and for them to find parking, which is not ideal.

2. **Shape of the warehouse** - Because the warehouse isn't a perfect rectangle we lose a lot of usable warehousing space. We are looking for a more traditional rectangle space so that we make more efficient use of the space.

3. **Height of the warehouse -** The height of the current warehouse is too low. It is around 16' in height with areas going to 21' but there are large beams running across the entire warehouse so this makes it difficult for us to set up racking systems so that we can store our goods high. We are currently looking for spaces that are 17-30' of clear height. My understanding is that because the tenants succeeded in having the 1950's warehouse that we occupy designated as an historic resource, along with the rest of the art colony, even if we wanted to (and it were cost effective), we couldn't raise the roof height.

4. **Windows/sun exposure -** The building has large windows in the warehouse area that is not optimal for warehousing as the sun exposure damages our merchandise.

5. **Limited power loads -** The warehouse as it currently stands can only offer a limited power load which is not enough to run our business adequately. We find ourselves having to strategize the different power outlets we can use throughout the warehouse to avoid the breaker being reset.

These are a few of the limiting factors that is driving our decision to look at alternate warehouses. I do not believe the conversion is displacing our business, but rather the changing requirements of warehouse users. And this conversion will not lessen the likelihood that the property will be available in the future for industrial uses. Rather the approval adjacent residential uses years ago, the changes in access brought about by the Alameda Corridor improvements, and the designation of the warehouse as historic, are the driving forces in limiting the availability of the warehouse for modern industrial usage.

Thanks,

Jason

EXHIBIT D

Article from Meybohm Commercial dated 4/3/2021

three6ixty

Industrial Basics – Why Care About Ceiling Height?

Posted on April 3, 2021 by Jonathan Aceves

You've probably seen ceiling height called out in listings for warehouses and manufacturing buildings. But why should that number matter to you?

What is "clear ceiling height"?

- "Clear ceiling height" is the height at which product can safely be stored on racking. It's also defined as the height of a building from the floor to the bottom of the lowest-hanging item on the ceiling, such as sprinklers or HVAC ducts.

Why should ceiling height matter to you?

- Warehouse capacity is determined by clear height. So, a tenant can increase the capacity of a warehouse by 10% to 25%, just by increasing clear height from 32 feet to 36 feet. After all, true warehouse capacity is how much product can be stored in a three-dimensional space—a measurement of volume (cubic feet) rather than area (square feet).

How have ceiling heights changed over time?

- Clear height under 20 feet was normal many years ago, but now most modern warehouses are built with 30-foot ceilings (some as high as 40 feet). New high-tech distribution and inventory systems are changing how warehouses are used, and even how space in them is described (Amazon for example has been considering using cubic feet—instead of square feet—to measure warehouse footprint).

What impact do ceiling heights have on building operations?

- A pallet of goods generally measures 64 inches, meaning that a building with 32-foot ceilings can stack between four to six pallets high. A building with 36-foot ceilings can provide between 10% and 25% more capacity. But the cost of the additional height has to measured against the cost of a larger building with lower ceilings—assuming that a user could actually make use of the higher ceilings.
- Low ceiling heights affect how much inventory can be stored in a building, as well as what kind of equipment and machinery can be used or moved around in a building. Many manufacturers have equipment that requires high ceilings—think monorail systems to move merchandise for processing.

Can low ceiling heights be remedied?

- Yes, contractors can raise the ceiling height on a warehouse, but costs can be very high ($5 to $25 per square foot—the price drops as the building gets bigger). Most contractors would advise you to demolish the building and start from scratch.

What's the takeaway?

- During site selection, ensure the team you're working with is thinking creatively in order to identify the space you need for your operations. Ceiling height is one of many factors that can help you maximize a warehouse's full potential.

This post originally appeared in Jonathan Aceves's blog and is republished with permission. You can read the original here.

Posted in Uncategorized Tagged Ceiling Height, CRE, Industrial, NNN, Warehouse

4 Reasons why you benefit from Exclusive Representation in Commercial Real Estate

Augusta Economic Overview

Join Our Community

Get Started

EXHIBIT E

Minute Order from the Superior Court of California dated 9/8/21

three6ixty

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES
Civil Division
Central District, Stanley Mosk Courthouse, Department 71

20STUD00380 September 8, 2021
ART COLONY PROPERTY LLC vs MICHAEL J. KLEINDIENST 9:30 AM

Judge: Honorable Monica Bachner CSR: None
Judicial Assistant: A. Barton ERM: None
Courtroom Assistant: D. Major Deputy Sheriff: None

APPEARANCES:

For Plaintiff(s): Chris Evans by Matthew Hogan

For Defendant(s): Elena Irene Popp (LACourtConnect)

Other Appearance Notes:

NATURE OF PROCEEDINGS:
Motion of Plaintiff, Art Colony Property LLC, for Summary Adjudication

Matter is called for hearing and argued.

The Court adopts its tentative ruling as its final order as follows:
Plaintiff/Landlord Art Colony Property, LLC's motion for summary adjudication of the 6th (Tenant Protection Act of 2019) affirmative defense raised Defendant/Tenant Michael J. Kleindienst and Defendants/Tenants in the related cases is granted.

Plaintiff Art Colony Property, LLC ("Plaintiff" or "Landlord") moves for summary adjudication against Defendant/Tenant Michael J. Kleindienst ("Defendant" or "Tenant") on the sole issue that he cannot establish his fourth affirmative defense alleging that the amount of rent demanded is defective because the rent was increased in excess of what is allowable under the Tenant Protection Act of 2019 ("TPA"). (Notice of Motion, pg. 1; Answer, pg. 5.) The Court notes that on February 22, 2021, the parties stipulated that the instant motion in the lead case would apply to all related cases in the action. Accordingly, Landlord moves for summary adjudication of the TPA affirmative defense as raised by Tenant as well as the other tenants/defendants (collectively, "Tenants" or "Defendants") in the related cases.

Evidentiary Objections

The Court notes Tenants' opposition refers to Evidentiary Objections to certain evidence submitted by Landlord in its moving papers; however, no Evidentiary Objections have been filed. Tenants' only filing is the 8/20/21 opposition which includes the opposition memorandum, a declaration of Tenants' counsel, a proof of service, and a Proposed Order for a matter with a

different case number and case name that appears wholly unrelated to the instant action. (Opposition, pgs. 8, 9.) To the extent Tenants object to the Declaration of Amy Forbes, the Court deems the objections immaterial to its disposition on the motion, and accordingly, declines to rule on them. (C.C.P. §437c(q).)

Landlord's 8/27/21 evidentiary objections to the Declaration of Elena Popp ("Popp") are not numbered; however, the Court assigns standard numeration. Landlord's evidentiary objection to the declaration in its entirety for lack of authentication is sustained [No. 1]. In the event Tenant submits a signed version of the declaration in advance of the hearing, Landlord's evidentiary objections are sustained as to Nos. 2, 3, 4, 5, 6, and 7.

Background

On January 14, 2020, Landlord filed the instant unlawful detainer action against Tenant for the premises located at 2415 S. Santa Fe Avenue, #2415, Los Angeles, CA 90058 (the "Tenant's Property").

The complaint alleges on January 8, 2019, Landlord served Tenant with a Three-Day Notice to Pay Rent or Quit (the "Notice") purporting to terminate Tenant's tenancy under C.C.P. §1161(2) via posting and mailing. (Complaint ¶¶7(a)(1), 8(a), Exh. 2.) On February 4, 2020, Tenant filed his answer, which includes a general denial and affirmative defenses. On June 22, 2020, Landlord filed a Notice of Related Case indicating that 20 identified cases all relate to the residential complex located at 2349, 2401, 2415, and 2412 South Santa Fe Avenue, Los Angeles, 90058 (collectively, "Property") which Landlord owns and which includes 57 residential units occupied by the defendants in the related cases. On June 29, 2020, the Court granted Landlord's motion for leave to amend the complaint and deemed the first amended complaint ("FAC") filed as of that date. (6/29/20 Minute Order.) The Court also ordered Tenant to file an amended answer by July 15, 2020. (6/29/20 Nunc Pro Tunc Order.) However, a review of the Court's record suggests Tenant did not file an amended answer, as only the February 4, 2020 answer is on file. On December 28, 2020, the Court granted Landlord's unopposed motion to reclassify the instant action to an unlimited civil case, and ordered the entire action reclassified. On March 31, 2021, Landlord filed a Notice of Related Case indicating an additional unlawful detainer ("UD") action concerning the Property had been filed, such that 21 pending cases involved tenants at the Property owned by Landlord. On April 29, 2021, the Court found the cases related and deemed the instant action the lead case, assigning it to Department 71. On May 28, 2021, Landlord filed the instant motion for summary adjudication. As noted above, the parties had previously stipulated that the motion for summary adjudication in the lead case would apply to all related

cases. [The Court notes the 2/22/21 Minutes indicate "defendant's" motion; however, this appears to be in error.] On August 20, 2020, Tenants filed their opposition. On August 27, 2021, Landlord filed its reply and evidentiary objections.

The Court notes the case Art Colony Property LLC vs. George Herbert, Case No. 21STUD01351 ("Herbert"), was on June 4, 2021, and was not related to the instant action at the time Landlord filed its motion for summary adjudication. Tenants argue Herbert should also be related to the instant action for the purposes of the issue raised in the instant motion. (Opposition, pg. 3.) In reply, Landlord does not address relating Herbert, and as such, does not appear to oppose relating it for this issue. On June 11, 2021, Defendant George Herbert ("Herbert"), a self-represented litigant, filed an answer in which he asserts the affirmative defense that rent increase is invalid under the TPA. (Herbert Answer, Attachment 3(o), pgs. 7-8.) A notice of related case has not yet been filed, and on July 9, 2021, Herbert was assigned to Department 93.

6th Affirmative Defense (TPA)

Tenants' sixth affirmative defense is based on the following allegations: (1) the amount of rent demanded in the notice is defective because the Property is subject to the TPA and the rent was increased in excess of what is allowable under the TPA; (2) Landlord increased the rent prior to January 1, 2020 and did not decrease the rent to the permissible rate after January 1, 2020 [C.C.P. §194712(h)(1)]; (3) the Property was previously subsidized by the government and a base rent was set prior to March 15, 2019; (4) the November 2019 rent increase violated the TPA; (5) Landlord has not demonstrated under penalty of perjury its compliance with Gov. Code §§65863.10, 65863.11, and 65863.13 to establish the rent increase is permissible [C.C.P. §1947.12]; (6) Landlord alleges it is exempt from the provisions of the TPA but failed to provide written notice of exemption. (Answer, pg. 4.)

The TPA, codified in Civil Code §1946, et seq., limits the amount by which an owner can increase rent, on or after March 15, 2019, to no more than "5 percent plus the percentage change in the cost of living, or 10 percent, whichever is lower" for a 12-month period." (Civ. Code §1947.12(a).)

Civil Code §1947.13(a)(1) further provides: "Notwithstanding Section 1947.12, upon expiration of rental restrictions, the following shall apply: (1) The owner of an assisted housing development who demonstrates, under penalty of perjury, compliance with all applicable provisions of Sections 65863.10, 65863.11, and 65863.13 of the Government Code and any other applicable law or regulation intended to promote the preservation of assisted housing, may

establish the initial unassisted rental rate for units in the applicable housing development. Any subsequent rent increase in the development shall be subject to Section 1947.12." (Emphasis added.)

Landlord submitted evidence that for a 30-year period starting in 1986, certain units at the Property were subject to rent restrictions for low or moderate-income households pursuant to a recorded covenant between the Property's prior owner and the Community Redevelopment Agency of the City of Los Angeles ("CRA"), under which, in exchange for loans from the CRA, the prior owner agreed to restrict rents (collectively, "CRA Agreement"). (Decl. of Navar ¶6.) Landlord submitted evidence it purchased the Property in July 2018 after the Property's prior owner had purported to increase the rents to market rates; however, at the time of the purchase, counsel for the Tenants Association informed Landlord that the prior owner's 2016 and 2017 notices (of intent to increase rents to market rates) failed to comply with Gov. Code §65863.10 and 6583.11, and accordingly demanded Landlord comply with the required notice provisions before collecting rents and requested Landlord rescind rent increases of low and low-moderate income housing that took effect in October 2017, and return any increased rental income. (Decl. of Navar ¶7.) Landlord submitted evidence that on October 26, 2018, it notified Tenants it was rescinding the October 2017 rent increases on low and moderate units, resetting the rents to conform with what the rents would have been had the rental restrictions remained in place, and Landlord refunded the prior owner's previously collected rent increases to Defendants as rent disgorgements. (Decl. of Navar ¶8.) Landlord agreed to entirely set back all market increases and to keep Tenants' rents at their prior rent-restricted rates during the 12-month period that followed. (Decl. of Navar ¶8.)

Landlord submitted evidence that at the time of its November 2019 rent increases, the 30-year rental restrictions on the Property, which had expired in 2016, had already expired. (Decl. of Navar ¶6.) Landlord submitted evidence that it did not reset Tenants' rents to market rates until November 2019. (Decl. of Navar ¶¶6-9.) Landlord submitted evidence that prior to increasing rates to the initial market rate effective November 1, 2019, it provided all statutory notices required under Government Code §§56863.10 and 65863.11 by: (1) providing Tenants a 12-month notice on October 26, 2018 [Section 65863.10]; (2) providing qualified entities Notice of an Opportunity to Purchase Property on October 24, 2018 [Section 65863.11]; and (3) providing Tenants six-month notices regarding the increased rents on April 26, 2019 [Section 65863.10]. (Decl. of Navar ¶9, Exhs. 2, 3, 4.)

As discussed above, Landlord also submitted evidence the 2017 rent increases did not constitute the initial "mark to market," namely, the one-time increase to initial unassisted rental rates after

expiration of a rental restriction and sending applicable notices for purposes of the statute [Section 1947.13] given those increases were rescinded and disgorged. (Motion, pg. Decl. of Navar ¶¶7-8.)

Landlord met its burden with respect to Tenants' 6th affirmative defense. Specifically, Landlord's evidence suggests Tenants cannot establish the rents were increased in excess of what is allowable under the TPA and/or that the November 2019 Rent increase violated the TPA. As discussed above, Landlord's evidence shows the Property's rental restrictions had expired in 2016, and as such it was no longer subject to rental restrictions. Landlord also submitted evidence that since the expiration of those restrictions, rents had not been effectively raised to "the initial unassisted market rate" given the 2017 increase was rescinded and disgorged. As such, the Property was not subject to the TPA's limits, and instead Landlord was entitled to establish the initial unassisted rental rate for units in the property, provided it complied with notice provisions, and thereafter any subsequent rent increase would be subject to the limits set forth in Section 1947.12.

Therefore, the burden shifts to Tenants to create a triable issue of material fact. As discussed below, Tenants did not meet their burden.

Tenants failed to submit any evidence creating a triable issue of material fact as to whether they can establish their 6th affirmative defense. Notably, Tenants contend the issue of whether Landlord is entitled to summary adjudication of the 6th affirmative defense is based on whether the Court determines the "initial [unassisted] rental rate… upon the expiration of the [rental] restriction[s]," for the purposes of being exempt from the TPA, was established on October 17, 2017, in which case Tenants would prevail, or on November 1, 2019, in which case Landlord would prevail. (Opposition, pg. 3.) As discussed above, Landlord submitted evidence the initial unassisted rental rate for the units in the property was set on November 1, 2019. Tenants did not submit evidence or cite to applicable authority suggesting the unassisted rate was in fact set on October 17, 2017. Tenants argue that notwithstanding Landlord's October 26, 2018 and April 26, 2019 notices, the "initial unassisted rental rate" was not established in November 2019 because: (1) the regulatory agreement [the CRA Agreement] ended more than two years before the notices were issued; (2) Landlord's act of re-issuing the notices was a "voluntary initiative" to resolve a "private conflict" it had with the Tenants Association; and (3) no rent restrictions remained in place when the notices were issued. (Opposition, pg. 5.) However, these arguments are not sufficiently supported. Tenants cite to no authority suggesting there is a time limit for issuing the required notices for the purposes of setting rent at an initial unassisted rate after the expiration of a rent restriction, and the terms of the statute do not imply a time limit, of two years or any

amount, exists. Tenants' assertion that the act of re-issuing the notices was a "voluntary initiative… to resolve a private conflict" fails to submit evidence or authority in support of the assertion that the existence of a conflict between the parties and/or the re-issuing of notices would preclude the TPA from applying to the new notices issued by Landlord. It appears Tenants argue that Landlord's rescinding of the rent increases and disgorgement of the amounts paid was simply to resolve a private matter separate from complying with the TPA, and voluntarily carried out by Landlord. However, Tenants do not dispute that the notices associated with the purported October 2017 increases were noncompliant and not effective for the purposes of increasing the rents to unassisted rates at that time, and the prior owner was not entitled to increase the rents to unassisted rates. As such, the undisputed evidence suggests while the prior owner attempted to increase the units to unrestricted rents, it was unsuccessful in doing so, making Landlord's November 2019 increase the initial increase, provided notices were proper. Finally, Tenants cite to no authority suggesting the fact no rental restrictions were in place at the time Landlord issued the new notices renders them invalid for the purposes of entitling Landlord to exemption from the TPA for the purpose of setting an initial unassisted rate on the units. The statute does not preclude properties for which the regulatory agreement no longer exists; rather, it applies to properties that were previously subject to a rental restriction. Here, it is undisputed the Property was subject to the rental restrictions under the CRA Agreement, which had expired by its own terms in 2016.

In addition, Tenants did not submit evidence creating a triable issue of fact as to whether Landlord complied with applicable notice provisions of Gov. Code §§65863.10, 65863.11, and 65863.13 for purposes of the TPA. Tenants argue the notices did not include "anticipated" rent as required by the statute, and instead only gave "approximate" rent. (Opposition, pg. 5.) However, whether the notice labeled the expected rent for the unit as "anticipated," "approximate," or "expected," all of these carry the same definition of what the rent was likely to be in the future, in a looking forward sense. Tenants cite to no authority suggesting the statute required the notices include exact amount of rent to be charged.

Based on the foregoing, Landlord's motion for summary adjudication of Tenants' 6th affirmative defense (Tenant Protection Act of 2019) is granted.

The Court's written Ruling is signed and filed this date.

Status conference is held.

On the Court's own motion, the Mandatory Settlement Conference (MSC) scheduled for 09/10/2021 is vacated . The Court will discuss scheduling of mandatory settlement on September 10, 2021.

Defendant is to give notice.

EXHIBIT F

Email dated 4/10/19

three6ixty

Message

From: Donna Smithey [donna.smithey@gmail.com]
Sent: 4/10/2019 4:09:48 PM
To: Teri Deaver [teri.deaver@artspace.org]
Subject: Re: Santa Fe Arts Colony

I was just on a call with LISC LA and they said they would love for ArtSpace to come to their City!

On Wed, Apr 10, 2019 at 3:33 PM Donna Smithey <donna.smithey@gmail.com> wrote:

Yes, the warehouse is included in the property. One scenario is to create more live/work spaces in the warehouse.

Alternately, a consultant has analyzed the parcel, and believes the warehouse could be torn down and a new 175 building on the western portion of the site. That would be under a R4 zoning overlay.

It's also possible a performance or other cultural organization might like to develop the warehouse.

On Wed, Apr 10, 2019 at 3:09 PM Teri Deaver <teri.deaver@artspace.org> wrote:

Thank you!
Does the bid include the parcel that has the single building, commercial tenant? There was an import or export group leasing it when I last visited. Would that be the location for a possible new build or other, synergistic creative business use?

Teri

On Wed, Apr 10, 2019 at 4:18 PM Donna Smithey <donna.smithey@gmail.com> wrote:

Teri:

Thanks for following up on SFAC. I'm attaching a short Executive Summary and a proforma.

Our current SFAC plan is to make a bid by April 22. The current owner is required to consider the bid, but is not obligated to sell. The Tenants Association isn't really in a position to own the property, so we are seeking a non-profit or mission oriented for-profit to purchase and own the property, perhaps with some consultative role for the TA, or even an option to purchase in the future. There is some indication that the current owner may be willing to sell, but we won't really know until a bid is submitted.

Some affordable units are substantially below allowable levels, however the tenants know that they will have to eventually pay at the increased amounts, even if stepped in over a year or two.

SFAC may or may not work with an Opportunity Zone Fund. We haven't really determined that yet.

Please let me know what questions you might have after reviewing the information. And thanks for your interest!

Donna

On Wed, Apr 10, 2019 at 2:08 PM Teri Deaver <teri.deaver@artspace.org> wrote:

Hi Donna,

I wanted to reach out to you separately since you are also working with Sylvia and others at the Santa Fe Arts Colony. I haven't talked with her in awhile but if in the work you are doing there you think that there is any similar opportunity in approach as with Vulcan Lofts, that you think we could be of help with, let me know. While I have been plugged in with them somewhat over the past couple of years, there hasn't been a funding model (or city support) enough for us to intervene in a truly meaningful way. However, if we can figure out a reasonable and sustainable approach to Vulcan that translates over, I'd like to talk with Steve and others in our office about helping in LA. Not sure if there's an opening with the new owner or if any headway that the artists make for themselves, will need to be in that current ownership context.

Thanks

Teri

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Teri Deaver
Vice President, Consulting and Strategic Partnerships
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twitter

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Donna Smithey
499 Embarcadero 3-7
Oakland, CA 94606
312-404-6204

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Donna Smithey
499 Embarcadero 3-7
Oakland, CA 94606
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Donna Smithey
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ATTACHMENT B

CRA COVENANT TERMINATION

three6ixty

This page is part of your document - DO NOT DISCARD

20171280703

Pages:
0005

Recorded/Filed in Official Records
Recorder's Office, Los Angeles County,
California

11/07/17 AT 11:23AM

FEES:	16.00
TAXES:	0.00
OTHER:	0.00
PAID:	16.00

LEADSHEET

201711073240038

00014476438

008710994

SEQ:
01

DAR - Counter (Upfront Scan)

THIS FORM IS NOT TO BE DUPLICATED

E548176

RECORDING REQUESTED BY:

WHEN RECORDED MAIL TO:

NAME Ronald S. Berg, Esq.

MAILING ADDRESS Berg LLP
Post Office Box 5205

CITY, STATE and ZIP CODE Montecito, CA
93150-5205

11/07/2017

20171280703

SPACE ABOVE THIS LINE RESERVED FOR RECORDER'S USE

TITLE(S)

Termination of Agreement Containing Covenants Affecting Real Property

B015 rev 20170331

RECORDING REQUESTED BY:
Recording Requested By, and
When Recorded, Return to:

_____
_____
_____
_____

Space above for recorder's use

TERMINATION OF AGREEMENT CONTAINING COVENANTS AFFECTING REAL PROPERTY

The City of Los Angeles ("City"), a municipal corporation, acting by and through the Los Angeles Housing and Community Investment Department ("Department") as successor to the housing assets and housing functions of the former Community Redevelopment Agency of the City of Los Angeles (the "former CRA/LA"), under California Health and Safety Code Section 34176(a) and pursuant to the Agreement regarding CRA/LA Affordable Housing Assets and Functions with an effective date of April 5, 2013, hereby terminates the "Agreement Containing Covenants Affecting Real Property", affecting the real property described in Exhibit "A" hereto, dated July 1, 1986, executed by Santa Fe Art Colony, a California general partnership in favor of the former CRA/LA, recorded on February 23, 1987, as Instrument No. 87-259560 of the Official records of Los Angeles County, State of California.

APN: 5167-008-012

LEGAL DESCRIPTION: See Exhibit A

DATED: November 3, 2017

For: **THE CITY OF LOS ANGELES**

RUSHMORE D. CERVANTES
General Manager
Los Angeles Housing and Community
Investment Department

By: _____
SEAN L. SPEAR
Its: Assistant General Manager
Housing Development Bureau

EXHIBIT A
Legal Description

PARCEL 1:

That portion of Block "A" of the Huntington Industrial Tract, in the City of Los Angeles, County of Los Angeles, State of California, as per map recorded in Book 6, Page 10 of Maps, in the office of the County Recorder of said County, described as follows:

Beginning at a point in the East line of said Block "A", distant South 0° 45' 30" East 745.81 feet from the Northeast corner of said Block, said point being the Southeast corner of the land conveyed to the Southern California Box Company by deed recorded in Book 4613, Page 38 of Deeds, Records of said County; thence along the Southerly line of the land so conveyed to said Southern California Box Company and its prolongation South 89° 44' West 557.58 feet; thence South 0° 29' East 30 feet, being a point in the West line of the land conveyed to Van Vorst & Berman Company by deed recorded in Book 5741, Page 107 of Deeds, Records of said County; thence continuing South 0° 29' East along said West line 234.09 feet to the Southwest corner of said land; thence along the Southerly line of the land conveyed by said last mentioned deed, North 89° 44' East 558.85 feet to the East line of said Block "A"; thence North 0° 45' 30" West 264.10 feet to the point of beginning.

PARCEL 2:

An easement for a single spur track over that portion of said Block "A", described as follows:

Beginning at the Southwest corner of said tract of land so conveyed to said Van Vorst and Berman Company; thence along the Southerly line of the land so conveyed, North 89° 44' East 41 feet to a point in a curve concave to the East and having a radius of 230 feet the radial line at said point bears South 57° 57' East; thence Southerly along said curve 97.80 feet; thence tangent to said curve South 7° 41' West 53.20 feet to a point in the Easterly line of the 30 foot strip of land conveyed to the Southern Pacific Railroad Company, by Deed recorded in Book 5033, Page 225 of Deeds, Records of said County; thence along said East line North 0° 29' West 144.50 feet to the point of beginning.

ACKNOWLEDGMENT

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Los Angeles)

On November 3, 2017 before me, Donya C. Plazo, Notary Public
(insert name and title of the officer)

personally appeared Sean L. Spear,
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

DONYA C. PLAZO
Notary Public - California
Los Angeles County
Commission # 2160011
My Comm. Expires Jul 16, 2020

Signature Donya C. Plazo (Seal)

ATTACHMENT C

ORIGINAL CERTIFICATES OF OCCUPANCY

three6ixty

Address of Building 2415 So. Santa Fe Avenue

CITY OF LOS ANGELES

CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Law—for following occupancies:

Issued 5/2/88 **Permit No. and Year** LA66737/87

Entire one story warehouse change of occupancy to 15 Artist in Residence spaces.

CUZ 86-0404 2 9 1 0 0 2 0 0 2 3 4

15 Required parking spaces provided.

Owner Marvin Zeidler

Owner's Address 401 No. Clifford
Los Angeles, CA 90049

Form B-95b

BY J. CARNEY/flp

Address of Building 2401 S. Santa Fe Avenue

CITY OF LOS ANGELES

CERTIFICATE OF OCCUPANCY

NOTE: Any change of use or occupancy must be approved by the Department of Building and Safety.

This certifies that, so far as ascertained by or made known to the undersigned, the building at the above address complies with the applicable requirements of the Municipal Code, as follows: Ch. 1, as to permitted uses, Ch. 9, Arts. 1, 3, 4, and 5; and with applicable requirements of State Housing Law—for following occupancies:

Issued 5/2/88 **Permit No. and Year** LA66737/87

Entire two story warehouse change of occupancy to 30 Artist in Residence.

CUZ 86-0404

2 9 1 0 0 2 0 2 3 3

30 Required parking spaces provided.

Owner Marvin Zeidler

Owner's Address 401 N. Cliffwood
Los Angeles, CA 90049

Form B-95b

BY J. CARNEY/flp

Address of Building 2421 So. Santa Fe Ave.

CITY OF LOS ANGELES

CERTIFICATE OF OCCUPANCY

Note: Any change of use of occupancy must be approved by the Department of Building and Safety.

☒ This certifies that, so far as ascertained or made known to the undersigned, the vacant land, building or portion of building described below and located at the above address complies with the applicable construction requirements (Chapter 9) and/or the applicable zoning requirements (Chapter 1) of the Los Angeles Municipal Code for the use, or occupancy group in which it is classified * (Non-Residential Uses)

☒ This certifies that, so far as ascertained by or made known to the undersigned, the building or portion of building described below and located at the above address complies with the applicable requirements of the Municipal Code, as follows Ch 1, as to permitted uses, Ch 9, Arts 1, 3, 4, and 5, and with applicable requirements of State Housing Law-for following occupancies * (Residential Uses)

Permit No and Year 89HO-00724

Change of use from a one story type III-N, 100' X 120', brick building B-4 manufacturing to a one story type III one hour, 100' X 120', brick building, B-2/R-1, Artist in Residence with 8 dwelling units.

No Change in parking.

Total Parking Required _____ ☒ No Change in Parking requirement

Total Parking Provided _____ = Standard _____ + Compact _____

* ALSO SUBJECT TO ANY AFFIDAVITS OR BUILDING AND ZONING CODE MODIFICATIONS WHETHER LISTED ABOVE OR NOT

Issued By / Office HO LA - VN - WLA - SP - C D #____ Bureau (BLDG) BCS Division GEN - MS (EQ -) BMI - COMM

Owner : Marvin Ziedler/Leonard Sturo

Owner's Address : 401 N. Cliffwood Ave.
Los Angeles Ca 90021

Issued 3-9-90 By M. Perez

B & S B-95A (R 3/88)

1 4 4 2 0 8 0 0 1 6 2

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

CERTIFICATE OF OCCUPANCY

CORRECTED

OWNER SANTA FE ART COLONY LP

0 PO BOX 25965
SHAWNEE MISSION KS 6 25

building or structure or portion thereof and no trailer park or portion thereof shall be used or occupied until a Certificate of Occupancy has been issued thereo Section

CERTIFICATE: Issued-Valid
BY: WINSTON P DUNNING
DATE: 08/19/2015

SITE IDENTIFICATION
ADDRESS: 2349 S SANTA FE AVE 90058

LEGAL DESCRIPTION

TRACT	BLOCK	LOT(s)	ARB	CO. MAP REF #	PARCEL PIN	APN
HUNTINGTON INDUSTRIAL TRACT	BLK A	"UNNUMBERED LT"	28	M B 6-10	117A217 26	5167-008-012

This certifies that, so far as ascertained or made known to the undersigned, the vacant land, building or portion of building described below and located at the above address(es) complies with the applicable construction requirements (Chapter 9) and/or the applicable zoning requirements (Chapter 1) of the Los Angeles Municipal Code for the use and occupancy group in which it is classified and with applicable requirements of the State Housing Law for the following occupancies and is subject to any affidavits or building and zoning code modifications whether listed or not.

COMMENT CHANGE OF USE CONVERT A SINGLE STORY MANUFACTURING BUILDING TO 4 ARTIST IN RESIDENCE UNITS "A , C, D and E" AND TO ADD MEZZANINES IN EACH UNIT, AND CREATE MANAGERIAL STORAGE UNIT "B"

USE

PRIMARY	OTHER
Artist-in-Residence	Manufacturing

PERMITS
12016-10000-04857 | 13016-10000-18272 |

STRUCTURAL INVENTORY

ITEM DESCRIPTION	CHANGED	TOTAL
Dwelling Unit	2 Units	2 Units
Floor Area (ZC)	0 Sqft	11769 Sqft
Height (BC)	0 Feet	
Height (ZC)	0 Feet	
Length	0 Feet	100 Feet
Mezzanine	1 Levels	1 Levels
NFPA-13 Fire Sprinklers Thru-out		
Stories	0 Stories	1 Stories
Type V-B Construction		
Width	0 Feet	100 Feet
R2 Occ. Group	6008 Sqft	6008 Sqft
R2 Occ. Load	30 Max Occ.	30 Max Occ.
S2 Occ. Group	-6008 Sqft	5761 Sqft
S2 Occ. Load	-24 Max Occ.	29 Max Occ.
Parking Req'd for Bldg (Auto+Bicycle)	0 Stalls	0 Stalls
Parking Req'd for Site (Auto+Bicycle)	75 Stalls	75 Stalls

CITY LA DBS
DEPARTMENT OF BUILDING AND SAFETY

APPROVAL

CERTIFICATE NUMBER	105297
BRANCH OFFICE:	LA
COUNCIL DISTRICT:	14
BUREAU:	INSPECTN
DIVISION:	BLDGINSP
STATUS:	CofO Issued
STATUS BY:	WINSTON P DUNNING
STATUS DATE:	08/19/2015

Winston Dunning

APPROVED BY:	WINSTON P DUNNING
EXPIRATION DATE:	

Certificate No: *105297

PERMIT DETAIL

PERMIT NUMBER	PERMIT ADDRESS	PERMIT DESCRIPTION	STATUS - DATE - BY
12016-10000-04857	2349 S Santa Fe Ave	CHANGE OF USE TO CONVERT PORTION OF SINGLE STORY MANUFACTURING BUILDING TO 2 ARTIST IN RESIDENCE UNITS "A AND C" AND TO ADD MEZZANINES IN EACH UNIT, AND TO COMPLY WITH DEPARTMENT ORDER effective date 05/11/2011. PERMIT WILL EXPIRE 30 DAYS FROM ISSUANCE DATE.	CofO Issued - 08/19/2015 WINSTON P DUNNING
13016-10000-18272	2349 S Santa Fe Ave	ADAPTIVE-REUSE: CHANGE OF USE TO CONVERT PORTION OF SINGLE STORY MANUFACTURING BUILDING TO 2 ARTIST IN RESIDENCE UNITS "D" AND "E" ADDING MEZZANINE'S TO EACH UNIT, AND CREATE MANAGERIAL STORAGE UNIT "B", AND TO COMPLY WITH DEPARTMENT ORDER effective date 05/11/2011. PERMIT WILL EXPIRE 30 DAYS FROM ISSUANCE DATE.	Permit Finaled - 08/19/2015 ERNESTO CORRAL

PARCEL INFORMATION

Area Planning Commission: Central
Community Plan Area: Central City North
Energy Zone: 8
Lot Cut Date: 08/18/1924
Parking Dist.: CCPD
Census Tract: 2060.50
Council District: 14
Fire District: 2
Lot Cut Date: PRIOR-06/01/1946
Thomas Brothers Map Grid: 674-H2
Certified Neighborhood Council: Downtown Los Angeles
District Map: 117A217
LADBS Branch Office: LA
Near Source Zone Distance: 0
Zone: M3-1

PARCEL DOCUMENT

City Planning Cases (CPC) CPC-1983-506-SP
City Planning Cases (CPC) CPC-1997-423
Community Development Block Grant (CDBG) LARZ-Central City
Ordinance (ORD) ORD-164855-SA3270
Specific Plan Area (SPA) South Los Angeles Alcohol Sales
Zoning Information File (ZI) ZI-2129 East Los Angeles State Enterprise Zone
City Planning Cases (CPC) CPC-1986-607-GPC
City Planning Cases (CPC) CPC-2007-3036-CA
Community Development Block Grant (CDBG) SEZ-East Los Angeles State Enterprise Zone
Ordinance (ORD) ORD-171682
Zoning Administrator"s Case (ZA) ZA-1986-404-CUZ
City Planning Cases (CPC) CPC-1995-352-CPU
Community Development Block Grant (CDBG) FEZ-Los Angeles
Ordinance (ORD) ORD-162128
Rent Stabilization Ordinance (RENT) YES
Zoning Administrator"s Case (ZA) ZA-2011-2074-ZAD

CHECKLIST ITEMS

Attachment - Plot Plan
Std. Work Descr - Seismic Gas Shut Off Valve

PROPERTY OWNER, TENANT, APPLICANT INFORMATION

OWNER(S)
Santa Fe Art Colony Lp — 0 Po Box 25965 — SHAWNEE MISSION KS 66225

TENANT

APPLICANT
Relationship: Agent for Owner
Mehrzad Givechi- — 19162 Van Ness St — TORRANCE, CA 90501 — (310) 782-9100

BUILDING RELOCATED FROM:

(C)ONTRACTOR, (A)RCHITECT & (E)NGINEER INFORMATION

	NAME	ADDRESS		CLASS	LICENSE #	PHONE #
(C)	Decoma Structural Industries Inc	19162 Van Ness Avenue,	Torrance, CA 90501	B	751888	
(E)	Givechi, Mehrzad	344 Via Colusa,	Redondo Beach, CA 90277	NA	C45725	

SITE IDENTIFICATION-ALL

ADDRESS:
2349 S SANTA FE AVE 90058

LEGAL DESCRIPTION-ALL

TRACT	BLOCK	LOT(s)	ARB	CO.MAP REF #	PARCEL PIN	APN
HUNTINGTON INDUSTRIAL TRACT	BLK A	NUMBERED	28	M B 6-10	117A217 26	5167-008-012

ATTACHMENT D

ADDITIONAL ENVIRONMENTAL DOCUMENTATION

three6ixty

AEI Consultants

July 21, 2022

SUB-SLAB DEPRESSURIZATION SYSTEM PERFORMANCE REPORT

Property Identification:
2345-2421 South Santa Fe Avenue
Los Angeles, California 90058

AEI Project No. 393142

Prepared for:
Art Colony LLC
c/o Mr. Joseph Manasseri
Fifteen Group
47 NE 36th Street
Second Floor
Miami, Florida 33137

Prepared by:
AEI Consultants
701 Campus Square W, Suite 723A
El Segundo, California 90245
(310) 798-4255

Environmental Due Diligence

Building Assessments

Site Investigation & Remediation

Energy Performance & Benchmarking

Industrial Hygiene

Construction Risk Management

Zoning Analysis Reports & ALTA Surveys

National Presence
Regional Focus
Local Solutions

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FIGURE

Figure 1 PCE Concentrations in Indoor Air

TABLE

Table 1 Indoor Air Sample Data Summary – May/July 2019

APPENDICES

Appendix A EKI Environment & Water, Inc. Letter Report on Indoor Air Sampling, July 19, 2022.
Appendix B Laboratory Analytical Reports

July 21, 2022

Art Colony, LLC
c/o Mr. Joseph Manaserri
Fifteen Group
47 NE 36th Street
Second Floor
Miami, Florida 33137

Subject: **SSD System Performance Report**
2345-2421 South Santa Fe Avenue
Los Angeles, California 90058
AEI Project No. 393142

Dear Mr. Manaserri:

AEI Consultants (AEI) is pleased to provide this summary report which describes the activities and results of assessments of the sub-slab depressurization system (SSD) at the Santa Fe Art Colony located at 2401-2435 South Santa Fe Avenue in Los Angeles, California (the Site).

1.0 BACKGROUND

The Site is an industrial mixed-use live/work space consisting of five (5) brick buildings (2401, 2415, 2421, 2349, and 2421) on the western side of South Santa Fe Avenue in Los Angeles, California (Figure 1). Four of the buildings are single-story and one building (2421) was constructed with a full basement. The largest building (2345), located in the northwestern portion of the Site is the location of Sun's Trading Company (Sun's), a commercial business.

On June 15, 2018, Art Colony Property LLC acquired the Site. During the due diligence process historical documents regarding the Site were provided by the seller, including portions of a May 24, 2017, *Phase II Environmental Site Assessment Report (Phase II)* prepared by EFI Global (EFI) that presented the results of previous subsurface investigation activities at the Site. The Phase II identified concentrations of volatile organic compounds (VOCs) in soil vapor that suggested a potential risk of vapor intrusion into the overlying commercial and joint live/work buildings at the Site. The report indicated that VOC impacts to soil vapor were likely from an off-site source.

To mitigate the potential for VOCs, specifically tetrachloroethylene (PCE)-impacted soil vapor from affecting indoor air quality within the overlying commercial and joint live/work buildings at the Site, AEI was retained to design and install an SSD system. The SSD system was installed between January 17 and March 29, 2019 and began operation on April 1, 2019. The system has been

operating continuously since startup, with the exception of brief shutdown periods to perform routine maintenance.

The SSD system includes approximately 1,585-feet of horizontal borings for installation of the sub-slab extraction wells, conveyance lines from the wells to the system compound, a 300-standard cubic feet per minute vacuum blower and two 1,000-pound granular activated carbon (GAC) vessels connected in series. The SSD system is operated under the conditions of the South Coast Air Quality Management District. To maintain compliance, the SSD system requires replacement of the 2,000-pounds of GAC approximately each quarter. To protect their tenants, Art Colony Property LLC has spent approximately $1,050,000 for the installation and approximately $100,000 yearly for the ongoing compliant operation of the SSD system.

Further documented in the recent investigation activities conducted at the adjoining property to the north, 2305 South Santa Fe Avenue, Los Angeles, California (Regional Water Board Site Cleanup Program [SCP] No. 1458, Site ID. No. 2040577) there are significant soil impacts at off-site properties and a regional groundwater plume exists in the Site vicinity originating at upgradient properties.

2.0 INDOOR AIR SAMPLING ACTIVITIES

Following startup of the SSD system, AEI assessed the performance of the system that it was meeting the design objectives. This assessment included two rounds of indoor air testing in May and July 2019 and two rounds of sub-slab vacuum assessments. In addition, EKI Environmental & Water, Inc. (EKI) recently conducted indoor air testing in selected vacant units, the results of which are described in their July 19, 2022, letter, which is attached as Appendix A.

2.1 Indoor Air Sampling – 2019

On May 20 and July 11, 2019, indoor air sampling was performed within select tenant suites at the Site. Indoor air sampling activities were conducted in general accordance with the guidelines outlined in *Final – Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance)* – October 2011, issued by the California Department of Toxic Substances Control (DTSC). For each sampling event, 20 indoor air samples (IA-1 through IA-20) and two (2) ambient air samples (AA-1 and AA-2) were collected. The samples were collected over a period of approximately 24 hours using laboratory-supplied individually laboratory-certified 6-liter evacuated sample canisters. The indoor and ambient air sample locations are shown on Figure 1.

During the sampling event, the status of the indoor climate control conditions was noted along with the outdoor weather conditions such as the temperature and wind direction. The flooring beneath the sample was noted. This information was recorded on sampling field data sheets.

The initial vacuum for each sample canister was checked and recorded prior to beginning sampling activities. After the vacuum was recorded, air sample collection began, and the air sample was drawn into the sample canister and through a dedicated flow controller. Following the designated time period of sample collection, each sample canister was sealed with a slight vacuum remaining. Once the final vacuum was recorded, the sample collection ceased and the valve to the sample canister was closed. The inlet of the sample canister was sealed with an air-tight cap.

The indoor and ambient air samples were labeled and transferred under appropriate chain-of-custody documentation to Advanced Technology Laboratories of Signa Hill, California for the May 2019 sampling event and to Pace Analytical Laboratories of Mt. Juliet, Tennessee for the July 2019 sampling event. A total of 44 indoor and ambient air samples were analyzed by the laboratory for PCE by United States Environmental Protection Agency Method TO-15 SIM.

2.1.1 Analytical Results – 2019

Table 1 presents a summary of the indoor air sample results. Laboratory analytical reports are included in Appendix B. The laboratory results of indoor and ambient air analyses were reviewed and compared to the Environmental Screening Levels (ESLs), human health initial screening levels for residential and commercial/industrial use scenarios, revised by the San Francisco Bay Regional Water Quality Control Board in July 2019, Revision 2.

The ESL comparison values provide conservative screening levels for over 100 chemicals commonly encountered at sites with impacted indoor air as well as soil, groundwater, and soil vapor. The primary goal of the ESLs is the identification and evaluation of potential environmental concerns at impacted sites. Under most circumstances, the presence of a chemical in soil, soil vapor, or groundwater detected at concentrations below their respective corresponding ESL comparison value can generally be assumed to not pose a significant threat to human health or the environment. The ESLs are not enforceable cleanup standards, and the presence of a chemical at or in excess of an ESL does not necessarily indicate that adverse impacts to human health or the environment are occurring, rather they indicate that a potential for adverse risk may exist and additional evaluation is warranted. The ESL comparison value for PCE for indoor air under commercial/industrial use scenarios is 2.0 micrograms per cubic meter ($\mu g/m^3$). The ESL comparison value for PCE under residential use scenarios is 0.42 $\mu g/m^3$.

It should be noted that the detection of PCE in indoor air does not, by itself, indicate that there is vapor intrusion from the subsurface. Some portion of PCE detected in indoor air may come from indoor sources, such as dry cleaned clothing or the use consumer products with a tenant suite. Many of the Site residents are artists who may use a variety of products containing VOCs in their live/work space.

Results of the May 2019 Sampling Event

Table 1 presents the summary of the indoor air sample results. During the May 2019 sampling event, PCE was detected in 19 of the 22 air samples submitted to the laboratory for analysis. The results can be summarized as follows:

- PCE was not detected at or above the laboratory method reporting limit in the 2 ambient air samples and in indoor air sample IA-13, which was collected from Unit 10 in Building 2415.
- Four (4) indoor air samples were collected from Building 2345 each yielded PCE at concentrations below the commercial and residential ESL comparison values.
- The indoor air sample collected from the Office in Building 2349 was below both the residential and commercial/industrial ESL comparison values.
- PCE was detected in six (6) of the indoor air samples collected from work/live units at concentrations below the residential ESL comparison value.

- In Building 2401 (Units B02, B05, B08 and B09), PCE was detected in the four indoor air samples (IA-8 through IA-11) collected, observed at concentrations ranging from 1.9 µg/m^3 to 9.9 µg/m^3, which are at or above the residential and commercial/industrial ESL comparison values.
- Of the four indoor air samples (IA-17 through IA-20) collected in Building 2421 (Units 21, 24, 25 and 27), PCE was detected in each of the four samples, observed at concentrations ranging from 0.88 µg/m^3 to 3.3 µg/m^3, exceeding the residential ESL comparison values. The PCE concentration also exceeded the commercial/industrial ESL in the air sample collected in Unit 21(IA20).

Results of the July 2019 Sampling Event

Table 1 presents the summary of the indoor air sample results. During the July 2019 sampling event, PCE was detected in 20 of the 22 air samples submitted to the laboratory for analysis. The results can be summarized as follows:

- PCE was not detected in each of the 2 ambient air samples at or above the laboratory method reporting limit.
- The detections of PCE in the 4 indoor air samples (IA-1 through IA-4) collected from Warehouse Building 2345 and the indoor air sample (IA-6) collected from the office in Building 2349 were below the commercial and residential ESL comparison values.
- PCE was detected in six (6) air samples below the residential ESL comparison value in samples IA-5 and IA-12 through IA-16.
- PCE was detected in the residential Unit A (IA-7) in Building 2349 at a concentration that exceeded the residential ESL comparison value.

  PCE was detected in the four indoor air samples (IA-8 through IA-11) collected in Building 2401(Units B02, B05, B08 and B09) ranging in concentration from 2.76 µg/m^3 to 18.2 µg/m^3, which exceed the residential ESL comparison value.

  PCE was detected in one of the four indoor air samples (IA-14) collected in Building 2415 at a concentration (0.731 µg/m^3) slightly exceeding the residential ESL comparison value.
- The four air samples collected within Building 2421 (IA21, IA24, IA25 and IA27) collected in Units 21, 24, 25 and 27, ranged in concentrations from 0.55 µg/m^3 to 9.09 µg/m^3 exceeding the residential ESL comparison value.

2.2 Further Evaluation of SSD System Performance

Following the indoor air survey, in order to further evaluate the effectiveness of the SSD and the potential for vapor intrusion, AEI conducted a sub-slab vacuum assessment in March 2020. The results of this assessment are reported in AEI's April 3, 2020, *Sub-Slab Vacuum Assessment Summary*. Sub-slab vacuum measurements ranged between 0.05 to 0.24 inches of water column. As presented in the US EPA's Engineering Issue *Indoor Air Vapor Intrusion Mitigation Approaches* October 2008 (EPA/600/R-080115) recommends a sub-slab vacuum between 0.016 and 0.04 inches of water column to protect from the potential for vapor intrusion. Therefore, as of March 2020, the SSD system appeared to be creating a sufficient vacuum beneath the buildings, where measured, that would be expected to limit the intrusion of PCE affected soil vapor into the buildings at the Site.

To confirm that the SSD system continued to operate effectively, AEI performed another sub-slab vacuum assessment in January 2022. The results of this assessment are reported in AEI's January 11, 2022, *Sub-Slab Vacuum Assessment Summary*. Sub-slab vacuum measurements ranged between 0.05 to 0.17 inches of water column, once again within the US EPA recommended range. Accordingly, as of January 2022, the SSD system continued to create a sufficient vacuum beneath the building, where measured, that would be expected to limit the intrusion of PCE affected soil vapor into the buildings at the Site.

2.3 Indoor Air Sampling –2022

In July 2022, EKI Environment & Water (EKI) collected eight air samples and one duplicate sample from within 5 recently vacated units. Prior to sampling, the units were all cleaned, thereby reducing the potential for a contribution from indoor sources of VOCs, including, but not limited to products and solvents utilized by the former tenants. A copy of EKI's report is included in Appendix A. The results can be summarized as follows:

- PCE was detected in eight of the nine indoor air samples collected and analyzed. Each of the observed PCE concentrations were below the residential ESL comparison value, with the exception of one sample that yielded PCE at a concentration of 0.789 µg/m^3. However, the duplicate sample yielded PCE at a concentration of 0.272 µg/m^3, which is below the residential ESL comparison value.

- Two outdoor air samples were taken in July 2022. One had PCE detected at a concentration of 0.253 µg/m^3, which is similar to the levels detected in indoor air. The second ambient sample had 19.6 µg/m^3, which is above the commercial ESL comparison value. Therefore, ambient PCE concentrations likely affected the results of the indoor air samples and the observed PCE concentrations in indoor air is not likely from vapor intrusion.

- TCE was not detected in the indoor air samples collected and analyzed from within the 5 units at or above the laboratory method reporting limit.

Based upon the sampling of these vacant units where PCE was previously observed above the residential ESL comparison value, and when vacant PCE was not observed at concentrations above ambient air concentrations indicates that the SSD system at the Site is protecting indoor air quality from the potential for vapor intrusion of PCE affected soil vapor beneath the Site.

AEI appreciates the opportunity to support this important project. If there are any questions regarding our investigation, please do not hesitate to contact Valerie Marshall at 310.847.9972.

Sincerely,
AEI Consultants

REGISTERED PROFESSIONAL ENGINEER
TRENT A. WEISE
No. C64480
Exp. 6/30/23
CIVIL
STATE OF CALIFORNIA

Trent A. Weise, P.E. (Lic. No. C64480)
Vice President
C: (408) 656-1738

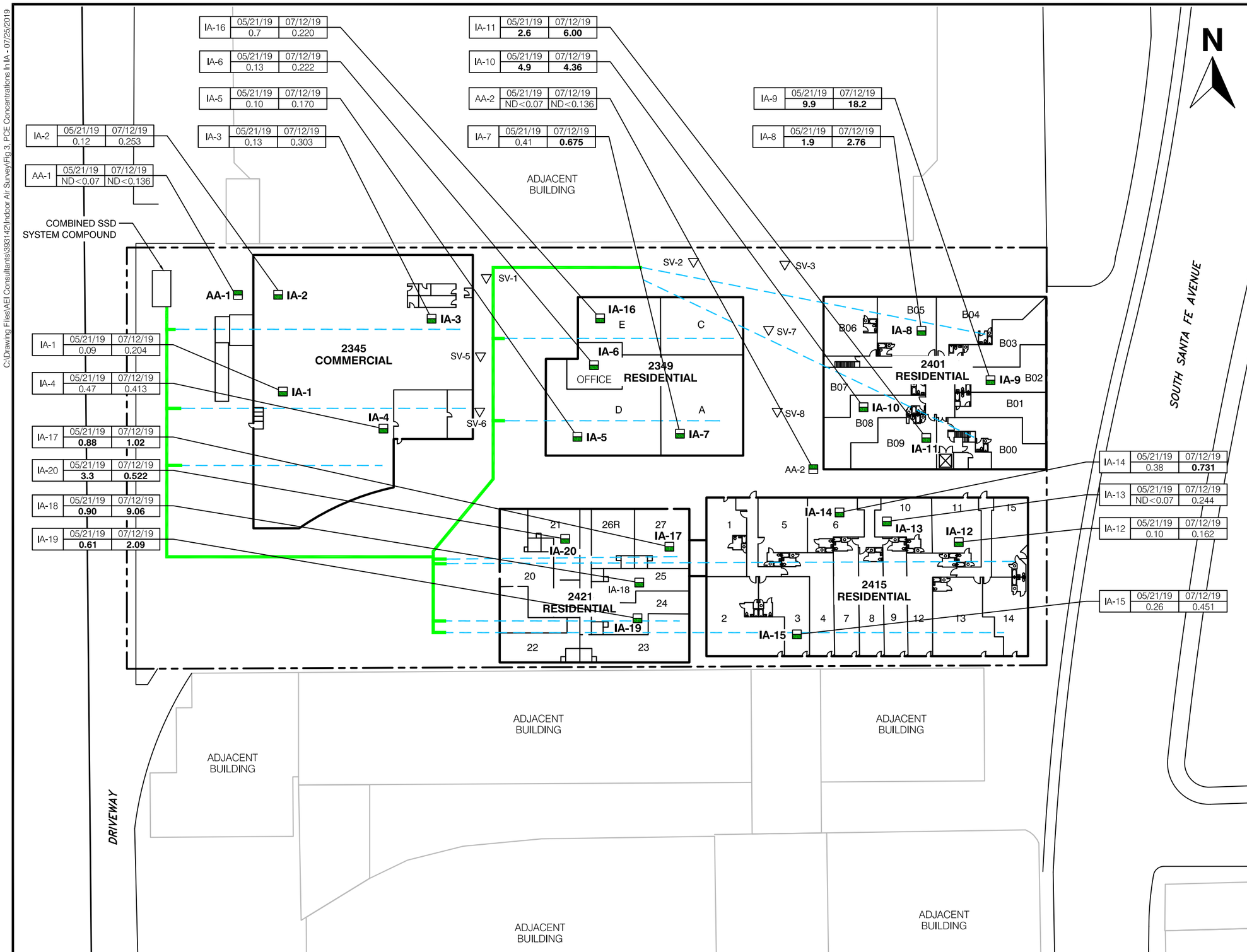
Valerie Marshall
Vice President
C: (310) 847-9972

AEI Consultants
701 Campus Square W, Suite 723A
El Segundo, California 90245

FIGURE

PCE Concentrations in Indoor Air

C:\Drawing Files\AEI Consultants\393142\Indoor Air Survey\Fig 3. PCE Concentrations In IA - 07/25/2019



LEGEND

- AA-1 Location of Ambient Air Sampling
- IA-20 Location of Indoor Air Sampling
- SV-8 Soil Vapor Probe Location
- Approximate Location of Sub-Slab Extraction Piping
- Approximate Location of Conveyance Piping Trench
- Property Boundary

Notes:

PCE Concentration in Micrograms per Cubic Meter ($\mu g/m^3$)
2401 - Floor plan depicts the building basement

Base Map Sources:
EFI Global Engineering, Fire & Environmental Services, 5/17/2017

0 60 120
APPROXIMATE SCALE IN FEET

AEI Consultants

2207 West 190th Street
Torrance, California

PCE CONCENTRATIONS IN INDOOR AIR

2345 South Santa Fe Avenue
Los Angeles, California

FIGURE 1
Project No. 393142

TABLE

Indoor Air Sample Data Summary-
May/July 2019

TABLE 1: INDOOR AIR SAMPLE DATA SUMMARY
2401-2435 South Santa Fe Avenue, Los Angeles California 90058
AEI Project No. 393142

U.S. EPA Method TO-15 SIM

Location ID	Date	Tetrachloroethylene (PCE)		Building No.	Unit
		($\mu g/m^3$)			
		Residential Units	Commercial Units		
IA-1	5/21/2019	--	0.09	2345	warehouse
	7/12/2019	--	0.204	2345	warehouse
IA-2	5/21/2019	--	0.12	2345	warehouse
	7/12/2019	--	0.253	2345	warehouse
IA-3	5/21/2019	--	0.13	2345	warehouse
	7/12/2019	--	0.303	2345	warehouse
IA-4	5/21/2019	--	0.47	2345	warehouse
	7/12/2019	--	0.413	2345	warehouse
IA-5	5/21/2019	0.10	--	2349	D
	7/12/2019	0.170	--	2349	D
IA-6	5/21/2019	--	0.13	2349	Office
	7/12/2019	--	0.222	2349	Office
IA-7	5/21/2019	0.41	--	2349	A
	7/12/2019	**0.675**	--	2349	A
IA-8	5/21/2019	**1.9**	--	2401	B05
	7/12/2019	**2.76**	--	2401	B05
IA-9	5/21/2019	**9.9**	--	2401	B02
	7/12/2019	**18.2**	--	2401	B02
IA-10	5/21/2019	**4.9**	--	2401	B08
	7/12/2019	**4.36**	--	2401	B08
IA-11	5/21/2019	**2.6**	--	2401	B09
	7/12/2019	**6.00**	--	2401	B09
IA-12	5/21/2019	0.10	--	2415	11
	7/12/2019	0.162	--	2415	11
IA-13	5/21/2019	ND<0.07	--	2415	10
	7/12/2019	0.244	--	2415	10
IA-14	5/21/2019	0.38	--	2415	6
	7/12/2019	**0.731**	--	2415	6
IA-15	5/21/2019	0.26	--	2415	3
	7/12/2019	0.451	--	2415	3
IA-16	5/21/2019	0.07	--	2349	E
	7/12/2019	0.220	--	2349	E
IA-17	5/21/2019	**0.88**	--	2421	27
	7/12/2019	**1.02**	--	2421	27
IA-18	5/21/209	**0.90**		2421	25
	7/12/2019	**9.06**	--	2421	25
IA-19	5/21/2019	**0.61**	--	2421	24
	7/12/2019	**2.09**	--	2421	24
IA-20	5/21/2019	**3.3**	--	2421	21
	7/12/2019	**0.522**	--	2421	21
AA-1	5/21/2019	ND<0.07	--	NW corner of 2345	
	7/12/2019	ND<0.136	--	NW corner of 2345	
AA-2	5/21/2019	ND<0.07	--	between 2401 and 2415	
	7/12/2019	ND<0.136	--	between 2401 and 2415	
Comparison Values in $\mu g/m^3$ - Environmental Screening Levels, Table IA-1, Residential; SFBRWQCB, January 2019, Rev. 1		0.46	--		
Comparison Values in $\mu g/m^3$ - Environmental Screening Levels, Table IA-1, Comm/Ind; SFBRWQCB, January 2019, Rev 1		--	2.0		

Notes:

$\mu g/m^3$	Micrograms per cubic meter
Table IA-1	Direct Exposure Human Health Risk Levels
SFBRWQCB	San Fransisco Bay Regional Water Qualtiy Control Board
VOCs	Volatile Organic Compounds
EPA	Environmental Protection Agency
Bold	Result exceeds a Comparison Value

APPENDIX A

EKI Environmental & Water, Inc.
Letter Report on Indoor Air Sampling,
July 19, 2022

eki environment & water

2355 Main Street, Suite 210
Irvine, CA 92614
(650) 292-9100
ekiconsult.com

19 July 2022

To: **Art Colony Property LLC**
C/O Fifteen Group
Attn: Joe Manasseri

From: Michelle K. King, PhD (EKI)
Chris Ingalls (EKI)
Kian Lew (EKI)

Subject: Summary of Indoor and Outdoor Air Analytical Data
2345-2421 S. Santa Fe Avenue, Los Angeles, California
(EKI C20112.00)

EKI Environment & Water, Inc. (EKI) is pleased to submit this Summary of Indoor and Outdoor Air Analytical Data, which summarizes the July 2022 investigation of indoor air quality for the property located at 2345-2421 S. Santa Fe Avenue in Los Angeles, California (Site). The Site, owned by Art Colony Property LLC (Property Owner), is currently occupied by four residential buildings (2349, 2401, 2415, and 2421 South Santa Fe Avenue) and one unoccupied commercial building (2345 S. Santa Fe Avenue) with a paved surface parking area in the southwest corner of the Site. Three of the residential buildings (2349, 2415, and 2421 S. Santa Fe Avenue) are single story and building 2401 S. Santa Fe Avenue is two stories with a basement. These buildings are referred to by their building address number throughout this summary document. The Site, referred to as the Santa Fe Art Colony, is identified as APN 5167-008-0012.

This summary was prepared for the sole use and reliance of Property Owner. Unless specifically authorized in writing in an agreement acceptable to EKI, reliance on this report by any other entity is not permitted or authorized. Reliance on the information contained in this summary document by any third party without authorization by EKI does not make the third party a beneficiary to EKI's agreement with Property Owner. Any such unauthorized reliance on or use of this summary document, including any of its information, conclusions, or recommendations, will be at third party's risk.

INDOOR AIR SAMPLING PROCEDURES

EKI performed one round of 24-hour indoor air testing at the Site starting on 6 July 2022 and ending on 7 July 2022. The indoor air sampling was performed in general accordance with the Department of Toxic Substances Control (DTSC) Vapor Intrusion Guidance (DTSC, 2011). The sampling focused on vacant units to minimize disruption to occupants. In addition, the sampling was biased toward the basement units because the highest volatile organic compound (VOC) concentrations were detected in the basement units in a previous indoor air sampling event (AEI, 2020). Additional details regarding the indoor air sample collection are described below.

- For the July 2022 air sampling event, eight air samples and one duplicate sample were collected from the interior of three of the four residential buildings (2401, 2415, and 2421 buildings). Two outdoor air samples were collected from the roofs of buildings 2345 and 2401 to assess ambient

concentrations generally upwind and downwind of the Site. The prevailing wind direction is northeast.

- A site reconnaissance walk was conducted on 5 July 2022 with a MiniRAE 3000 photoionization detector (PID) set to parts per billion (ppb) to determine the most appropriate areas to collect indoor and outdoor samples. During the site reconnaissance walk, EKI personnel recorded notes and readings in areas that could be preferential pathways, conditions of units, the presence of chemical products in the units, and wind direction.
- Interior sample locations were selected based on the 5 July 2022 site reconnaissance walk and vacancy of residential units. Samples collected in building 2401 were setup in the basement in units B00, B01, and B07. Samples collected from building 2415 were collected in unit 10. Samples collected from building 2421 were collected in unit 25. Indoor air samples collected from buildings 2415 and 2421 previously had detected VOC concentrations, but at levels that were lower than the basement unit VOC concentrations.
- In building 2041, each residential unit sampled had one air sample collected in the main room (designated with an "-1" at the end of the sample ID) and one air sample collected in the bathroom to represent occupied space with penetrations that could potentially serve as pathways for vapor intrusion (designated with an "-2" at the end of the sample ID).
- For the July 2022 sampling event, the vacant residential units were ventilated with fans and open windows for 72 hours which were then shutoff and closed for at least 24 hours prior to testing. None of the units had centralized heating ventilation and cooling (HVAC) systems. An existing soil vapor extraction (SVE) system, that also appears to be designed to serve as a sub slab depressurization system, was noted on the Site and appeared to be operating during the sampling event.
- The air samples were collected in pre-evacuated 6-liter SUMMA® passivated, stainless steel sample canisters supplied by the analytical laboratory, K-Prime, Inc. analytical laboratory in Santa Rosa, California (K-Prime). Each sample canister was fitted with a flow controller to collect the sample over an approximate 24-hour period, and a vacuum gauge to monitor the vacuum in the canister during sampling. Each canister, flow controller, and gauge was individually certified to be free of the selected VOC analytes at the specified analytical reporting limits. The sample canisters for the air samples were setup with the sampling inlet at a breathing zone height of approximately three to five feet above either the building floor or roof.
- Air samples were analyzed for the select VOCs tetrachloroethene (PCE) and trichloroethene (TCE). PCE and TCE were the only VOCs detected in sub slab soil vapor samples collected at the Site (AEI, 2020). All air samples were analyzed by K-Prime using United States Environmental Protection Agency (U.S. EPA) Method TO-15 using selected ion monitoring (SIM).
- During the sample collection period, EKI periodically recorded the vacuum in each sample canister, as indicated on the vacuum gauge provided with the canister, to verify acceptable sample collection rates. EKI personnel completed chain-of-custody (COC) documentation which was included with the air samples for return delivery to K-Prime (see COC with the air sample laboratory analytical reports in Attachment A).
- Following completion of sample collection, EKI returned the sample containers and equipment to the laboratory using chain-of-custody procedures. All sampling materials and equipment were removed from the Site by EKI immediately following the sampling activities.

INDOOR AIR SAMPLING RESULTS

A summary of analytical sample results for PCE and TCE measured during the July 2022 indoor air event are described below. Analytical results for PCE and TCE concentrations measured in the July 2022 air samples are provided on Table 1 and are compared with the residential screening levels referenced in the table. Laboratory data sheets for the July 2022 indoor air events are provided in Attachment A.

July 2022 Indoor Air Sample Results

- PCE was detected in 10 of the 11 samples, including the duplicate and outdoor samples. However, PCE was only detected above the residential indoor air screening level of 0.46 ug/m^3 in one indoor sample, IA-B07-1 (0.789 ug/m^3); the PCE concentration in the duplicate sample (IA-B07-1-DUP) collected directly next to IA-B07-1 was below the residential indoor screening level at a concentration of 0.272 ug/m^3. PCE was detected in both outdoor air samples with the upwind air sample OA-1 above the residential indoor air screening level of 0.46 ug/m^3 at a concentration of 19.6 ug/m^3. PCE concentrations in sample OA-1 may be attributed to newer roofing material noted on building 2345.
- TCE was detected in 1 of the 11 air samples which was outdoor air sample OA-1. The TCE concentration in OA-1 (0.0572 ug/m^3) was below the residential indoor air screening level of 0.48 ug/m^3.

Information from K-Prime regarding the July 2022 indoor air samples, including reports of residual vacuum and individual certification reports for the sample canisters, is provided in Attachment A. Samples were all analyzed within the 30-day hold time for SUMMA canisters. PCE and TCE were not detected in the laboratory blank at the laboratory reporting limit. Analytes and surrogates in the laboratory spike and spike duplicate samples were all recovered within their acceptable limits.

For the duplicate sample collected on 7 July 2022 from location IA-B07-1, relative percent differences (RPDs) could only be calculated for samples with detected concentrations. The RPDs for PCE was 97.46%. Overall, the RPD indicates poor agreement between the primary and duplicate samples.

SUMMARY

- In general, the PCE concentrations in indoor air samples collected in the July 2022 air sampling event were below the residential indoor air screening level of 0.46 ug/m^3 with the exception of location IA-B07-1. Although IA-B07-1 was above the residential screening level, the PCE concentration in the duplicate sample collected directly next to it was below the residential screening level. This duplicate sample PCE concentration of 0.272 ug/m^3 was similar to the second sample (IA-B07-2) collected in this residential unit that had a PCE concentration of 0.245 ug/m^3.
- PCE concentrations of the outdoor air samples showed a concentration significantly greater than the residential air screening level in the upwind location (OA-1) and below the residential air screening level in the downwind location (OA-2). The PCE concentration at location OA-2 was 0.253 ug/m^3 and appears to be consistent with most of the indoor air sample concentrations.

Very truly yours,

EKI ENVIRONMENT & WATER, INC.

Michelle K. King, Ph.D.
President

Chris Ingalls
Principal Geologist

Attachments

Table 1 Summary of Indoor and Outdoor Air Sample Analytical Results for VOCs

Attachment A Analytical Laboratory Data Sheets, July 2022 Sampling Event

References

AEI, 2020. Sub-slab Vacuum Assessment Summary. Art Colony LLC, 2345 South Santa Fe Avenue Los Angeles CA. AEI Consultants. 3 April 2020.

DTSC, 2022. Human Health Risk Assessment (HHRA) Note Number 3. California EPA, Department of Toxic Substances Control, Office of Human Health and Ecological Risk (HERO), June 2020. Revised May 2022.

DTSC, 2011. Guidance for the Evaluation and Mitigation of Subsurface Vapor Intrusion to Indoor Air (Vapor Intrusion Guidance), October 2011.

Table 1
Indoor and Outdoor Air Analytical Results for VOCs (Target Compounds)
2345-2421 S. Santa Fe Avenue
Los Angeles, California 90058

Sample Location		Sample ID	Sample Collection Date	Analytical Results µg/m^3 (a, b)	
Building	Room			PCE	TCE
Indoor Air Samples					
2415	10	IA-10	7/7/2022	<0.0678	<0.0537
2421	25	IA-25	7/7/2022	0.0855	<0.0537
2401	B00	IA-B00-1	7/7/2022	0.143	<0.0537
		IA-B00-2	7/7/2022	0.153	<0.0537
	B01	IA-B01-1	7/7/2022	0.201	<0.0537
		IA-B01-2	7/7/2022	0.119	<0.0537
	B07	IA-B07-1	7/7/2022	**0.789**	<0.0537
		IA-B07-1-DUP	7/7/2022	0.272	<0.0537
		IA-B07-2	7/7/2022	0.245	<0.0537
Outdoor Air Samples					
2345	Roof	OA-1	7/7/2022	**19.6**	0.0572
2401	Roof	OA-2	7/7/2022	0.253	<0.0537
Residential Ambient Air Screening Level (c)				**0.46**	**0.48**

Notes:
(a) Bold Above residential screening levels
(b) Air samples were analyzed by K Prime Inc., Santa Rosa, California using U.S. EPA Method TO-15 SIM for VOCs.
(c) Screening levels from DTSC-SLs

Abbreviations:
<0.49 = not detected above the laboratory reporting limit
DTSC = California Department of Toxic Substances Control
PCE = tetrachloroethene
TCE = trichloroethene
µg/m^3 = micrograms per kilogram

References:
DTSC, 2022. HERO HHRA Note Number 3: DTSC-modified Screening Levels (DTSC-SLs). California Department of Toxic Substances Control, June 2020. Revised May 2022.

K PRIME INC.

LABORATORY TEST REPORT

ACCT: 9115

TO: MS. MICHELLE KING
MR. KIAN LEW
MR. DANIEL MORRIS
EKI ENVIRONMENT & WATER, INC.
2001 JUNIPERO SERRA BOULEVARD, SUITE 300
DALY CITY, CA 94014

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mkking@ekiconsult.com
klew@ekiconsult.com
dmorris@ekiconsult.com

FROM: Richard A. Kagel, Ph.D. RAK
Laboratory Director by AB 7/15/22

SUBJECT: LABORATORY RESULTS FOR YOUR PROJECT: C20112.00

The following samples were received at our laboratory July 11, 2022.

SAMPLE ID	TYPE	DATE	TIME	KPI LAB #
OA-1	AIR	7/7/2022	9:13	234740
IA-10	AIR	7/7/2022	10:33	234741
IA-25	AIR	7/7/2022	11:14	234742
IA-B01-2	AIR	7/7/2022	11:20	234743
IA-B07-1	AIR	7/7/2022	11:24	234744
IA-B07-1-DUP	AIR	7/7/2022	11:24	234745
IA-B07-2	AIR	7/7/2022	12:13	234746
IA-B00-1	AIR	7/7/2022	12:01	234747
IA-B00-2	AIR	7/7/2022	12:03	234748
IA-B01-1	AIR	7/7/2022	13:00	234749
OA-2	AIR	7/7/2022	13:45	234750

Test results included in this report meet the requirements of ISO/IEC 17025:2017 as verified by the ANSI-ASQ National Accreditation Board (ANAB), and/or the requirements of the California Environmental Laboratory Accreditation Program (CA-ELAP), as applicable. Refer to certificates and scopes of accreditation AT-1427 (ANAB) and CA-ELAP #1532.

Results relate only to the samples tested. This test report shall not be reproduced except in full, without written permission of the laboratory.

If there are questions or concerns regarding this report, please contact your laboratory representative.

K Prime, Inc.
3621 Westwind Blvd.
Santa Rosa, CA 95403
Tel: (707)-527-7574 Fax: (707)-527-7879

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	OA-1
LAB NO:	234740
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	9:13
BATCH ID:	071222A5
DATE ANALYZED:	07/12/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	0.0106	0.0537	0.0572
TETRACHLOROETHENE	127-18-4	0.0100	2.88	0.0678	19.6

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-10
LAB NO:	234741
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	10:33
BATCH ID:	071222A5
DATE ANALYZED:	07/12/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	ND	0.0678	ND

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-25
LAB NO:	234742
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	11:14
BATCH ID:	071222A5
DATE ANALYZED:	07/12/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0126	0.0678	0.0855

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-B01-2
LAB NO:	234743
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	11:20
BATCH ID:	071222A5
DATE ANALYZED:	07/12/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0176	0.0678	0.119

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-B07-1
LAB NO:	234744
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	11:24
BATCH ID:	071222A5
DATE ANALYZED:	07/12/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.116	0.0678	0.789

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-B07-1-DUP
LAB NO:	234745
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	11:24
BATCH ID:	071222A5
DATE ANALYZED:	07/12/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0401	0.0678	0.272

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-B07-2
LAB NO:	234746
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	12:13
BATCH ID:	071222A5
DATE ANALYZED:	07/13/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0361	0.0678	0.245

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-B00-1
LAB NO:	234747
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	12:01
BATCH ID:	071222A5
DATE ANALYZED:	07/13/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0211	0.0678	0.143

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-B00-2
LAB NO:	234748
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	12:03
BATCH ID:	071222A5
DATE ANALYZED:	07/13/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0226	0.0678	0.153

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	IA-B01-1
LAB NO:	234749
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	13:00
BATCH ID:	071222A5
DATE ANALYZED:	07/13/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0296	0.0678	0.201

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY REPORT

K PRIME PROJECT: 9115
CLIENT PROJECT: C20112.00

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

SAMPLE ID:	OA-2
LAB NO:	234750
SAMPLE TYPE:	AIR
DATE SAMPLED:	07/07/2022
TIME SAMPLED:	13:45
BATCH ID:	071222A5
DATE ANALYZED:	07/13/2022

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	0.0373	0.0678	0.253

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
RL - REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

APPROVED BY: AB
DATE: 7/14/22

K PRIME, INC.
LABORATORY METHOD BLANK REPORT

METHOD BLANK ID: B071222A5
SAMPLE TYPE: AIR

BATCH ID: 071222A5
DATE ANALYZED: 07/12/2022

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

		PPB (V/V)		µg/cu. m	
COMPOUND NAME	**CAS NO.**	**RL**	**SAMPLE CONC**	**RL**	**SAMPLE CONC**
TRICHLOROETHENE	79-01-6	0.0100	ND	0.0537	ND
TETRACHLOROETHENE	127-18-4	0.0100	ND	0.0678	ND

NOTES:
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT
MRL - METHOD REPORTING LIMIT
NA - NOT APPLICABLE OR AVAILABLE
µg/cu. m VALUES ARE CALCULATED FROM PPB RESULTS USING NORMAL TEMPERATURE AND PRESSURE (NPT).

K PRIME, INC.
LABORATORY QUALITY CONTROL REPORT

LAB CONTROL ID: L071222A5
LAB CONTROL DUPLICATE ID: D071222A5

SAMPLE TYPE: AIR
BATCH ID: 071222A5
DATE ANALYZED: 07/12/2022

METHOD: VOC'S IN AIR
REFERENCE: EPA METHOD TO 15 (GC-MS-SIM)

COMPOUND NAME	SPIKE ADDED (PPB)	REPORTING LIMIT (PPB)	SAMPLE CONC (PPB)	SPIKE CONC (PPB)	SPIKE REC (%)	REC LIMITS (%)
1,1-DICHLOROETHENE	0.500	0.010	ND	0.399	80	60 - 140
BENZENE	0.500	0.050	ND	0.466	93	60 - 140
TRICHLOROETHENE	0.500	0.010	ND	0.572	114	60 - 140
TOLUENE	0.500	0.050	ND	0.504	101	60 - 140
TETRACHLOROETHENE	0.500	0.010	ND	0.522	104	60 - 140

COMPOUND NAME	SPIKE ADDED (PPB)	SPIKE DUP CONC (PPB)	SPIKE DUP REC (%)	RPD (%)	QC LIMITS RPD (%)	QC LIMITS REC (%)
1,1-DICHLOROETHENE	0.500	0.399	80	0.2	25	60 - 140
BENZENE	0.500	0.472	94	1.3	25	60 - 140
TRICHLOROETHENE	0.500	0.580	116	1.3	25	60 - 140
TOLUENE	0.500	0.511	102	1.4	25	60 - 140
TETRACHLOROETHENE	0.500	0.529	106	1.4	25	60 - 140

NOTES:
NA - NOT APPLICABLE OR AVAILABLE
ND - NOT DETECTED AT OR ABOVE THE STATED REPORTING LIMIT

EKI Environment & Water, Inc.

CHAIN OF CUSTODY RECORD

9115

PAGE 1 OF 1

CONSULTING ENGINEERS AND SCIENTISTS | 2355 Main Street, Suite 210, Irvine CA 92614 | PHONE: 650-292-9100 | http://www.ekiconsult.com

Project Name: Art Colony Property LLC

Project No.: C20112.00

Location: 2345 - 2421 Santa Fe Ave, Los Angeles CA

Sampled By: Daniel Morris/Kian Lew

Reporting:
Electronic Format: Hard Copy Format: PDF
QA Data Report Level:
Please report results to the following people:
(1) Data Archive: labs@ekiconsult.com
(2) Michelle King mkking@ekiconsult.com
(3) Kian Lew klew@ekiconsult.com
(4) Daniel Morris dmorris@eki consult.com

Laboratory:
K-Prime Laboratories, Inc.
3621 Westwind Boulevard
Santa Rosa, CA, USA 95403
(707) 527-7574

ANALYSES REQUESTED

EKI COC No.: (20220707-1)

Revision: _____ (A, B, C, D, etc.)
Date: By:

Field Sample ID	Lab Sample No.	Date	Time	Matrix	Container Count & Type	EPA TO-15 SIM PCE	EPA TO-15 SIM TCE						Extract and HOLD	HOLD	Cannister Vaccum (In/Hg) Initial	Final	EXPECTED TURNAROUND TIME	Remarks/Summa ID No.
OA-1	234740	7/7/2022	9:13	Air	(1) 6 Liter Summa	X	X								29	2	5-Day	ICA-511
IA-10	234741	7/7/2022	10:33	Air	(1) 6 Liter Summa	X	X								30	3.5	5-Day	ICA-923
IA-25	234742	7/7/2022	11:14	Air	(1) 6 Liter Summa	X	X								>30	5	5-Day	ICA-786
IA-B01-2	234743	7/7/2022	11:20	Air	(1) 6 Liter Summa	X	X								30	4.5	5-Day	ICA-306
IA-B07-1	234744	7/7/2022	11:24	Air	(1) 6 Liter Summa	X	X								30	4.5	5-Day	ICA-330
IA-B07-1-DUP	234745	7/7/2022	11:24	Air	(1) 6 Liter Summa	X	X								30	4	5-Day	ICA-724
IA-B07-2	234746	7/7/2022	~~11:24~~ *1	Air	(1) 6 Liter Summa	X	X								29.5	5.5	5-Day	ICA-738
IA-B00-1	234747	7/7/2022	12:01	Air	(1) 6 Liter Summa	X	X								>30	5	5-Day	ICA-309
IA-B00-2	234748	7/7/2022	12:03	Air	(1) 6 Liter Summa	X	X								30	5	5-Day	ICA-790
IA-B01-1	234749	7/7/2022	13:00	Air	(1) 6 Liter Summa	X	X								>30	5.5	5-Day	ICA-735
OA-2	234750	7/7/2022	13:45	Air	(1) 6 Liter Summa	X	X								>30	6	5-Day	ICA-508

Special Instructions:
*PER CI 7/14/22 ←
1. 12:13

Relinquished by: (Signature/Affiliation)	Date & Time	Received by: (Signature/Affiliation or Carrier/Air Bill No.)
DANIEL MORRIS EKI	7/8/22 1430	
Relinquished by: (Signature/Affiliation)	**Date & Time**	**Received by: (Signature/Affiliation)**
FEDEX 2753 1135 3300	7/11/2022 12:20	KPI
Relinquished by: (Signature/Affiliation)	**Date & Time**	**Received by: (Signature/Affiliation)**

=FieldDataForms-2021-03

APPENDIX B

LABORATORY ANALYTICAL REPORTS

June 03, 2019

Alicia Siegel
AEI Consultants
2207 W. 190th St.
Torrance, CA 90504
Tel: (310) 798-4255
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ELAP No.: 1838
CSDLAC No.: 10196
ORELAP No.: CA300003

Re: ATL Work Order Number : 1902084
Client Reference : SFAC, 393142

Enclosed are the results for sample(s) received on May 22, 2019 by Advanced Technology Laboratories. The sample(s) are tested for the parameters as indicated on the enclosed chain of custody in accordance with applicable laboratory certifications. The laboratory results contained in this report specifically pertains to the sample(s) submitted.

Thank you for the opportunity to serve the needs of your company. If you have any questions, please feel free to contact me or your Project Manager.

Sincerely,

Edgar Caballero
President & Laboratory Director

The cover letter and the case narrative are an integral part of this analytical report and its absence renders the report invalid. Test results contained within this data package meet the requirements of applicable state-specific certification programs. The report cannot be reproduced without written permission from the client and Advanced Technology Laboratories.

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

SUMMARY OF SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
AA-1	1902084-01	Air	5/21/19 8:00	5/22/19 11:00
AA-2	1902084-02	Air	5/21/19 9:04	5/22/19 11:00
IA-1	1902084-03	Air	5/21/19 8:43	5/22/19 11:00
IA-2	1902084-04	Air	5/21/19 9:00	5/22/19 11:00
IA-3	1902084-05	Air	5/21/19 8:56	5/22/19 11:00
IA-4	1902084-06	Air	5/21/19 8:53	5/22/19 11:00
IA-5	1902084-07	Air	5/21/19 9:19	5/22/19 11:00
IA-6	1902084-08	Air	5/21/19 9:17	5/22/19 11:00
IA-7	1902084-09	Air	5/21/19 9:29	5/22/19 11:00
IA-8	1902084-10	Air	5/21/19 9:43	5/22/19 11:00
IA-9	1902084-11	Air	5/21/19 9:45	5/22/19 11:00
IA-10	1902084-12	Air	5/21/19 9:49	5/22/19 11:00
IA-11	1902084-13	Air	5/21/19 9:48	5/22/19 11:00
IA-12	1902084-14	Air	5/21/19 9:53	5/22/19 11:00
IA-13	1902084-15	Air	5/21/19 9:56	5/22/19 11:00
IA-14	1902084-16	Air	5/21/19 10:02	5/22/19 11:00
IA-15	1902084-17	Air	5/21/19 10:08	5/22/19 11:00
IA-16	1902084-18	Air	5/21/19 9:39	5/22/19 11:00
IA-17	1902084-19	Air	5/21/19 10:07	5/22/19 11:00
IA-18	1902084-20	Air	5/21/19 10:11	5/22/19 11:00
IA-19	1902084-21	Air	5/21/19 10:13	5/22/19 11:00
IA-20	1902084-22	Air	5/21/19 10:09	5/22/19 11:00

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID AA-1

Lab ID: 1902084-01

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	ND	0.07	1	B9F0014	05/31/2019	05/31/19 16:02	
Surrogate: 4-Bromofluorobenzene	*94.0 %*	*70 - 130*		B9F0014	05/31/2019	*05/31/19 16:02*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID AA-2

Lab ID: 1902084-02

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	ND	0.07	1	B9F0014	05/31/2019	05/31/19 16:53	E3
Surrogate: 4-Bromofluorobenzene	*111 %*	*70 - 130*		B9F0014	05/31/2019	*05/31/19 16:53*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-1

Lab ID: 1902084-03

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte		Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene		**0.09**	0.07	1	B9E0976	05/29/2019	05/29/19 01:42	
Surrogate: 4-Bromofluorobenzene	*77.7 %*		*70 - 130*		B9E0976	05/29/2019	*05/29/19 01:42*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-2

Lab ID: 1902084-04

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.12**	0.07	1	B9E0976	05/29/2019	05/29/19 02:29	
Surrogate: 4-Bromofluorobenzene	*79.0 %*	*70 - 130*		B9E0976	05/29/2019	*05/29/19 02:29*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-3

Lab ID: 1902084-05

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.13**	0.07	1	B9E0976	05/29/2019	05/29/19 03:18	
Surrogate: 4-Bromofluorobenzene	*78.7 %*	*70 - 130*		B9E0976	05/29/2019	*05/29/19 03:18*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-4

Lab ID: 1902084-06

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.47**	0.07	1	B9E0976	05/29/2019	05/29/19 09:05	
Surrogate: 4-Bromofluorobenzene	*91.9 %*	*70 - 130*		B9E0976	05/29/2019	*05/29/19 09:05*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-5

Lab ID: 1902084-07

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.10**	0.07	1	B9E0976	05/29/2019	05/29/19 09:50	E3
Surrogate: 4-Bromofluorobenzene	*62.6 %*	*70 - 130*		B9E0976	05/29/2019	*05/29/19 09:50*	S10

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-6

Lab ID: 1902084-08

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.13**	0.07	1	B9E0976	05/29/2019	05/29/19 10:36	E3
Surrogate: 4-Bromofluorobenzene	*84.2 %*	*70 - 130*		B9E0976	05/29/2019	*05/29/19 10:36*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-7

Lab ID: 1902084-09

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.41**	0.07	1	B9F0014	05/31/2019	05/31/19 20:13	
Surrogate: 4-Bromofluorobenzene	*72.4 %*	*70 - 130*		B9F0014	05/31/2019	*05/31/19 20:13*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-8
Lab ID: 1902084-10

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**1.9**	0.07	1	B9E0983	05/29/2019	05/29/19 16:05	
Surrogate: 4-Bromofluorobenzene	*72.7 %*	*70 - 130*		B9E0983	05/29/2019	*05/29/19 16:05*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-9

Lab ID: 1902084-11

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**9.9**	0.07	1	B9E0983	05/29/2019	05/29/19 16:52	
Surrogate: 4-Bromofluorobenzene	*83.6 %*	*70 - 130*		B9E0983	05/29/2019	*05/29/19 16:52*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-10

Lab ID: 1902084-12

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**4.9**	0.07	1	B9F0014	05/31/2019	05/31/19 21:06	
Surrogate: 4-Bromofluorobenzene	*135 %*	*70 - 130*		B9F0014	05/31/2019	*05/31/19 21:06*	S5

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-11

Lab ID: 1902084-13

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**2.6**	0.07	1	B9F0014	05/31/2019	05/31/19 21:59	E3
Surrogate: 4-Bromofluorobenzene	*96.7 %*	*70 - 130*		B9F0014	05/31/2019	*05/31/19 21:59*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-12

Lab ID: 1902084-14

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.10**	0.07	1	B9E0983	05/29/2019	05/29/19 19:11	
Surrogate: 4-Bromofluorobenzene	*78.6 %*	*70 - 130*		B9E0983	05/29/2019	*05/29/19 19:11*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-13

Lab ID: 1902084-15

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte		Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene		ND	0.07	1	B9F0014	05/31/2019	05/31/19 22:53	
Surrogate: 4-Bromofluorobenzene	*61.7 %*		*70 - 130*		B9F0014	05/31/2019	*05/31/19 22:53*	S13

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-14

Lab ID: 1902084-16

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.38**	0.07	1	B9F0014	05/31/2019	05/31/19 19:20	E3
Surrogate: 4-Bromofluorobenzene	*68.7 %*	*70 - 130*		B9F0014	05/31/2019	*05/31/19 19:20*	S13

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-15

Lab ID: 1902084-17

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.26**	0.07	1	B9F0014	05/31/2019	05/31/19 23:46	
Surrogate: 4-Bromofluorobenzene	*62.5 %*	*70 - 130*		B9F0014	05/31/2019	*05/31/19 23:46*	S13

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-16

Lab ID: 1902084-18

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.07**	0.07	1	B9F0014	06/01/2019	06/01/19 00:38	
Surrogate: 4-Bromofluorobenzene	*105 %*	*70 - 130*		B9F0014	06/01/2019	*06/01/19 00:38*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-17

Lab ID: 1902084-19

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.88**	0.07	1	B9E0983	05/30/2019	05/30/19 00:39	
Surrogate: 4-Bromofluorobenzene	*73.8 %*	*70 - 130*		B9E0983	05/30/2019	*05/30/19 00:39*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-18

Lab ID: 1902084-20

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.90**	0.07	1	B9F0014	06/01/2019	06/01/19 01:33	E3
Surrogate: 4-Bromofluorobenzene	*87.4 %*	*70 - 130*		B9F0014	06/01/2019	*06/01/19 01:33*	

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-19

Lab ID: 1902084-21

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**0.61**	0.07	1	B9F0014	06/01/2019	06/01/19 02:27	E3
Surrogate: 4-Bromofluorobenzene	*68.4 %*	*70 - 130*		B9F0014	06/01/2019	*06/01/19 02:27*	S13

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Client Sample ID IA-20

Lab ID: 1902084-22

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) **Analyst: MFR**

Analyte	Result (ug/m³)	PQL (ug/m³)	Dilution	Batch	Prepared	Date/Time Analyzed	Notes
Tetrachloroethene	**3.3**	0.07	1	B9F0014	06/01/2019	06/01/19 03:20	
Surrogate: 4-Bromofluorobenzene	*50.0 %*	*70 - 130*		B9F0014	06/01/2019	*06/01/19 03:20*	S13

Certificate of Analysis

AEI Consultants	Project Number :	SFAC, 393142
2207 W. 190th St.	Report To :	Alicia Siegel
Torrance , CA 90504	Reported :	06/03/2019

QUALITY CONTROL SECTION

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) - Quality Control

Analyte	Result (ug/m³)	PQL (ug/m³)	MDL (ug/m³)	Spike Level	Source Result	% Rec	% Rec Limits	RPD	RPD Limit	Notes
Batch B9E0976 - EPA 5030										
Blank (B9E0976-BLK1)					Prepared: 5/28/2019 Analyzed: 5/28/2019					
Tetrachloroethene	ND	0.07	0.03							
Surrogate: 4-Bromofluorobenzene	*5.878*			*7.15738*		*82.1*	*70 - 130*			
LCS (B9E0976-BS1)					Prepared: 5/28/2019 Analyzed: 5/28/2019					
Tetrachloroethene	0.854187	0.07	0.03	0.678250		126	70 - 130			
Surrogate: 4-Bromofluorobenzene	*6.295*			*7.15738*		*88.0*	*70 - 130*			
LCS Dup (B9E0976-BSD1)					Prepared: 5/28/2019 Analyzed: 5/28/2019					
Tetrachloroethene	0.857104	0.07	0.03	0.678250		126	70 - 130	0.341	20	
Surrogate: 4-Bromofluorobenzene	*6.094*			*7.15738*		*85.1*	*70 - 130*			

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) - Quality Control

Analyte	Result (ug/m³)	PQL (ug/m³)	MDL (ug/m³)	Spike Level	Source Result	% Rec	% Rec Limits	RPD	RPD Limit	Notes
Batch B9E0983 - EPA 5030										
Blank (B9E0983-BLK1)					Prepared: 5/29/2019 Analyzed: 5/29/2019					
Tetrachloroethene	ND	0.07	0.03							
Surrogate: 4-Bromofluorobenzene	*5.453*			*7.15738*		*76.2*	*70 - 130*			
LCS (B9E0983-BS1)					Prepared: 5/29/2019 Analyzed: 5/29/2019					
Tetrachloroethene	0.530459	0.07	0.03	0.678250		78.2	70 - 130			
Surrogate: 4-Bromofluorobenzene	*5.692*			*7.15738*		*79.5*	*70 - 130*			
LCS Dup (B9E0983-BSD1)					Prepared: 5/30/2019 Analyzed: 5/30/2019					
Tetrachloroethene	0.771305	0.07	0.03	0.678250		114	70 - 130	37.0	20	R
Surrogate: 4-Bromofluorobenzene	*5.140*			*7.15738*		*71.8*	*70 - 130*			

Certificate of Analysis

AEI Consultants	Project Number :	SFAC, 393142
2207 W. 190th St.	Report To :	Alicia Siegel
Torrance , CA 90504	Reported :	06/03/2019

Volatile Organic Compounds in AIR by TO-15 SIM (ug/m3) - Quality Control

Analyte	Result (ug/m³)	PQL (ug/m³)	MDL (ug/m³)	Spike Level	Source Result	% Rec	% Rec Limits	RPD	RPD Limit	Notes
Batch B9F0014 - EPA 5030										
Blank (B9F0014-BLK1)					Prepared: 5/31/2019 Analyzed: 5/31/2019					
Tetrachloroethene	ND	0.07	0.03							
Surrogate: 4-Bromofluorobenzene	*5.137*			*7.15738*		*71.8*	*70 - 130*			
LCS (B9F0014-BS1)					Prepared: 5/31/2019 Analyzed: 5/31/2019					
Tetrachloroethene	0.799453	0.07	0.03	0.678250		118	70 - 130			
Surrogate: 4-Bromofluorobenzene	*5.137*			*7.15738*		*71.8*	*70 - 130*			
LCS Dup (B9F0014-BSD1)					Prepared: 5/31/2019 Analyzed: 5/31/2019					
Tetrachloroethene	0.758893	0.07	0.03	0.678250		112	70 - 130	5.21	20	
Surrogate: 4-Bromofluorobenzene	*5.046*			*7.15738*		*70.5*	*70 - 130*			

Certificate of Analysis

AEI Consultants		Project Number :	SFAC, 393142
2207 W. 190th St.		Report To :	Alicia Siegel
Torrance , CA 90504		Reported :	06/03/2019

Notes and Definitions

S5	Surrogate recovery was above laboratory acceptance limit. Sample reanalysis showed the same high recovery.
S13	Surrogate recovery was below laboratory acceptance limit. Sample reanalysis showed the same low recovery.
S10	Surrogate recovery was outside of laboratory acceptance limit due to possible matrix interference.
R	RPD value outside acceptance criteria. Calculation is based on raw values.
E3	Internal standard recoveries did not meet method acceptance due to matrix interference. Result value is estimated.
ND	Analyte is not detected at or above the Practical Quantitation Limit (PQL). When client requests quantitation against MDL, analyte is not detected at or above the Method Detection Limit (MDL)
PQL	Practical Quantitation Limit
MDL	Method Detection Limit
NR	Not Reported
RPD	Relative Percent Difference
CA2	CA-ELAP (CDPH)
OR1	OR-NELAP (OSPHL)

Notes:
(1) The reported MDL and PQL are based on prep ratio variation and analytical dilution.
(2) The suffix [2C] of specific analytes signifies that the reported result is taken from the instrument's second column.
(3) Results are wet unless otherwise specified.

ADVANCED TECHNOLOGY LABORATORIES
3275 Walnut Ave., Signal Hill, CA 90755
Tel: (562) 989-4045 • Fax: (562) 989-4040

CHAIN OF CUSTODY RECORD

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Instruction: Complete all shaded areas.

For Laboratory Use Only — ATLCOC Ver:20190413

Method of Transport: ☐ Client ☐ ATL ☐ FedEx ☐ OnTrac ☐ GSO ☐ Other: _____

Sample Conditions Upon Receipt					
Condition	Y	N	Condition	Y	N
1. CHILLED	☐	☐	5. # OF SAMPLES MATCH COC	☐	☐
2. HEADSPACE (VOA)	☐	☐	6. PRESERVED	☐	☐
3. CONTAINER INTACT	☐	☐	7. COOLER TEMP, deg C:		
4. SEALED	☐	☐			

CUSTOMER

Company: AEI
Address: 2207 W 190th Street
City: Torrance State: CA Zip: 90504
Tel: 310-798-4255
Fax:

SEND REPORT TO:
Attn: Alicia Siegel Email: asiegel@aelconsultants.com
Company:
Address: Page 1
City: State: Zip:

SEND INVOICE TO: ☐ same as SEND REPORT TO
Attn: Accounts Payable Email:
Company:
Address: ON FILE
City: State: Zip:

EDD: ☒ Excel ☐ EDF ☐ Equis ☐ _____

QA/QC: ☒ Routine ☐ Caltrans ☐ Legal ☐ RWQCB ☐ Level IV ☐ _____

PROJECT SAMPLES

Project Name: SFAC
Project No.: 393142
Sampler: Dash Geyer / Kate lamb
Quote #:
PO #:
Special Instructions/Comments: only analyze for PCE by TO-15 SIM

ITEM	Laboratory ID (For Lab Use Only)	Sample Description: Sample ID / Location	Date	Time	PCE by TO-15 SIM	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Select Soil Matrix	Select Solid Matrix	Select Water Matrix	Select Wastewater Matrix	Select Non-aqueous Matrix	Enter Custom Matrix	Turnaround Time (TAT)	Container: Quantity	Type: 1=Tube; 2=VOA; 3=Liter; 4=Pint; 5=Jar; 6=Tedlar; 7=Canister	Material: 1=Glass; 2=Plastic; 3=Metal	Preservative: 1=HCl; 2=HNO3; 3=H2SO4; 4=4C; 5=ZnI(Ac)2; 6=NaOH; 7=NAZS2O3	Remarks
1	1902084-11	1A-9	5/21/19	0945	X																							5	1	7	3		
2	-12	1A-10		0949	X																												
3	-13	1A-11		0948	X																												
4	-14	1A-12		0953	X																												
5	-15	1A-13		0956	X																												
6	-16	1A-14		1002	X																												
7	-17	1A-15		1008	X																												
8	-18	1A-16		0939	X																												
9	-19	1A-17		1007	X																												
10	-20	1A-18		1011	X																												

TERMS

1. Sample receiving hours: 7:30 AM to 7:30 PM Monday - Friday; Saturday 8:00 AM to 12:00 PM.
2. Samples submitted AFTER 5:00 PM are considered received the following business day at 8:00 AM.
3. The following turnaround time conditions apply:
   - TAT = 0 : 300% Surcharge SAME BUSINESS DAY if received by 9:00 AM
   - TAT = 1 : 100% Surcharge NEXT BUSINESS DAY (COB 5:00 PM)
   - TAT = 2 : 50% Surcharge 2ND BUSINESS DAY (COB 5:00 PM)
   - TAT = 3 : 30% Surcharge 3RD BUSINESS DAY (COB 5:00 PM)
   - TAT = 4 : 20% Surcharge 4TH BUSINESS DAY (COB 5:00 PM)
   - TAT = 5 : NO SURCHARGE 5th BUSINESS DAY (COB 5:00 PM)
4. Weekend, holiday, after-hours work — ask for quote.
5. Subcontract TAT is 10 - 15 business days. Projects requiring shorter TATs will incur a surcharge respective to the subcontract lab --- ask for quote.
6. Liquid and solid samples will be disposed of after 45 calendar days from receipt of samples; air samples will be disposed of after 14 calendar days after receipt of samples.
7. Electronic records maintained for five (5) years from report date.
8. Hard copy reports will be disposed of after 45 calendar days from report date.
9. Storage and Report Fees:
   - Liquid & solid samples: Complimentary storage for forty-five (45) calendar days from receipt of samples; $2/sample/month if extended storage or hold is requested.
   - Air samples: Complimentary storage for ten (10) calendar days from receipt of samples; $20 sample/week if extended storage is requested.
   - Hard copy and regenerated reports/EDDs: $17.50 per hard copy report requested; $50.00 per regenerated/reformatted report; $35 per reprocessed EDD.
10. Rush TCLP/STLC samples: add 2 days to analysis TAT for extraction procedure.
11. Unanalyzed samples will incur a disposal fee of $7 per sample.
12. The laboratory will randomly select from all QC samples received the sample to spike for Matrix Spike/ Matrix Spike Duplicate (MS/MSD) at no cost. However, if you want the laboratory to additionally perform MS/MSD on your sample, a charge will be assessed for the specific sample used.

Relinquished by: (Signature and Printed Name)	Date:	Time:	Received by: (Signature and Printed Name)	Date:	Time:
[signature]	5/22/19	1100	[signature]	5/22/19	1100
[signature]	5/22/19	1141	[signature]	5/22/19	1141
[signature]					

As the authorized agent of the company above, I hereby purchase laboratory services from ATL as shown above and hereby guarantee payment as quoted.

Dashiell Geyer — Printed Name
[signature] — Signature

ADVANCED TECHNOLOGY LABORATORIES
3275 Walnut Ave., Signal Hill, CA 90755
Tel: (562) 989-4045 • Fax: (562) 989-4040

CHAIN OF CUSTODY RECORD

Page 3 of 3

Instruction: Complete all shaded areas.

For Laboratory Use Only — ATLCOC Ver:20190413

Method of Transport	Sample Conditions Upon Receipt					
	Condition	Y	N	Condition	Y	N
☐ Client ☐ ATL	1. CHILLED	☐	☐	5. # OF SAMPLES MATCH COC	☐	☐
☐ FedEx ☐ OnTrac	2. HEADSPACE (VOA)	☐	☐	6. PRESERVED	☐	☐
☐ GSO	3. CONTAINER INTACT	☐	☐	7. COOLER TEMP, deg C:		
☐ Other: _____	4. SEALED	☐	☐			

CUSTOMER

Company: AEI
Address: 2207 W 190th Street
Tel: 310-798-4255
City: Torrance State: CA Zip: 90504 Fax:

SEND REPORT TO:
Attn: Page 1 Email:
Company:
Address:
City: State: Zip:

SEND INVOICE TO: ☐ same as SEND REPORT TO
Attn: Accounts Payable Email:
Company: on FILE
Address:
City: State: Zip:

EDD: ☒ Excel ☐ EDF ☐ Equis ☐ _____

QA/QC: ☒ Routine ☐ Caltrans ☐ Legal ☐ RWQCB ☐ Level IV ☐ _____

PROJECT SAMPLES

Project Name: SFAC
Project No.: 393142
Sampler: Dash Geyer / Kate Lamb
Quote #:
PO #:
Special Instructions/Comments: only analyze PCE by TO-15 SIM

ITEM	Laboratory ID (For Lab Use Only)	Sample ID / Location	Date	Time	PCE by TO-15 SIM	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Select Soil Matrix	Select Solid Matrix	Select Water Matrix	Select Wastewater Matrix	Select Non-aqueous Matrix	Enter Custom Matrix	Turnaround Time (TAT)	Quantity	Type: 1=Tube; 2=VOA; 3=Liter; 4=Pint; 5=Jar; 6=Tedlar; 7 = Canister	Material: 1=Glass; 2=Plastic; 3=Metal	Preservative: 1=HCl; 2=HNO3; 3=H2SO4; 4=4C; 5=Zn(Ac)2; 6=NaOH; 7=NA2S2O3	Remarks
1	1902084-21	1A-19	5/21/19	1013	X																							5	1	7	3		
2	↓ -22	1A-20	↓	1009	X																							↓	↓	↓	↓		
3																																	
4																																	
5																																	
6																																	
7																																	
8																																	
9																																	
10																																	

TERMS

1. Sample receiving hours: 7:30 AM to 7:30 PM Monday - Friday; Saturday 8:00 AM to 12:00 PM.
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   - TAT = 3 : 30% Surcharge 3RD BUSINESS DAY (COB 5:00 PM)
   - TAT = 4 : 20% Surcharge 4TH BUSINESS DAY (COB 5:00 PM)
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4. Weekend, holiday, after-hours work --- ask for quote.
5. Subcontract TAT is 10 - 15 business days. Projects requiring shorter TATs will incur a surcharge respective to the subcontract lab --- ask for quote.
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7. Electronic records maintained for five (5) years from report date.
8. Hard copy reports will be disposed of after 45 calendar days from report date.
9. Storage and Report Fees:
   - Liquid & solid samples: Complimentary storage for forty-five (45) calendar days from receipt of samples; $2/sample/month if extended storage or hold is requested.
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   - Hard copy and regenerated reports/EDDs: $17.50 per hard copy report requested; $50.00 per regenerated/reformatted report; $35 per reprocessed EDD.
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[signature]	5/22/19	1100	[signature]	5/22/19	11:00
[signature]	5/22/19	1141	[signature]	5-22-19	11:41
Relinquished by: (Signature and Printed Name)	Date:	Time:	Received by: (Signature and Printed Name)	Date:	Time:

As the authorized agent of the company above, I hereby purchase laboratory services from ATL as shown above and hereby guarantee payment as quoted.

Dashiell Geyer
Printed Name

Signature

ADVANCED TECHNOLOGY LABORATORIES
3275 Walnut Ave., Signal Hill, CA 90755
Tel: (562) 989-4045 • Fax: (562) 989-4040

CHAIN OF CUSTODY RECORD

Page 1 of 3

Instruction: Complete all shaded areas.

For Laboratory Use Only — ATLCOC Ver:20190413

Method of Transport	Sample Conditions Upon Receipt					
	Condition	Y	N	Condition	Y	N
☐ Client ☑ ATL ☐ FedEx ☐ OnTrac ☐ GSO ☐ Other:	1. CHILLED	☐	☐	5. # OF SAMPLES MATCH COC	☐	☐
	2. HEADSPACE (VOA)	☐	☐	6. PRESERVED	☐	☐
	3. CONTAINER INTACT	☐	☐	7. COOLER TEMP, deg C:		
	4. SEALED	☐	☐			

CUSTOMER

Company: AEI
Address: 2207 W 190th Street
City: Torrance State: CA Zip: 90504
Tel: 310-798-4255
Fax:

SEND REPORT TO:
Attn: Alicia Siegel
Email: asiegel@aeiconsultants.com
Company: AEI
Address: 2207 W 190th Street
City: Torrance State: CA Zip: 90504

SEND INVOICE TO: ☐ same as SEND REPORT TO
Attn: Accounts Payable
Email:
Company:
Address: on FILE
City: State: Zip:

EDD: ☒ Excel ☐ EDF ☐ Equis ☐ _____

QA/QC: ☑ Routine ☐ Caltrans ☐ Legal ☐ RWQCB ☐ Level IV ☐ _____

PROJECT SAMPLES

Project Name: SFAC
Project No.: 393142
Sampler: Dash Geyer / Kate Lamb
Quote #:
PO #:
Special Instructions/Comments: only analyze for PCE by TO-15 SIM

ITEM	Laboratory ID (For Lab Use Only)	Sample ID / Location	Date	Time	PCE by TO-15 SIM	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Select Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Enter Custom Analysis	Select Soil Matrix	Select Solid Matrix	Select Water Matrix	Select Wastewater Matrix	Select Non-aqueous Matrix	Enter Custom Matrix	Turnaround Time (TAT)	Quantity	Type: 1=Tube; 2=VOA; 3=Liter; 4=Pint; 5=Jar; 6=Tedlar; 7=Canister	Material: 1=Glass; 2=Plastic; 3=Metal	Preservative: 1=HCl; 2=HNO3; 3=H2SO4; 4=4C; 5=Zn(Ac)2; 6=NaOH; 7=NA2S2O3	Remarks
1	1902084-01	AA-1	5/21/19	0800	X																							5	1	7	3		
2	-02	AA-2		0904	X																												
3	-03	IA-1		0843	X																												
4	-04	IA-2		0900	X																												
5	-05	IA-3		0856	X																												
6	-06	IA-4		0853	X																												
7	-07	IA-5		0919	X																												
8	-08	IA-6		0917	X																												
9	-09	IA-7		0929	X																												
10	-10	IA-8		0943	X																												

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Relinquished by: (Signature and Printed Name)	Date:	Time:	Received by: (Signature and Printed Name)	Date:	Time:
	5/22/19	1100		5/22/19	1100
	5/22/19	1141		5-22-19	1141

As the authorized agent of the company above, I hereby purchase laboratory services from ATL as shown above and hereby guarantee payment as quoted.

Dashiell Geyer
Printed Name

Signature

ANALYTICAL REPORT

July 23, 2019

AEI Consultants - Torrance, CA

Sample Delivery Group:	L1119007
Samples Received:	07/16/2019
Project Number:	393142
Description:	SFAC
Report To:	Kate Lamb 2207 W. 190th Street Torrance, CA 90504

Entire Report Reviewed By:

Brian Ford

Brian Ford
Project Manager

Results relate only to the items tested or calibrated and are reported as rounded values. This test report shall not be reproduced, except in full, without written approval of the laboratory. Where applicable, sampling conducted by Pace Analytical National is performed per guidance provided in laboratory standard operating procedures ENV-SOP-MTJL-0067 and ENV-SOP-MTJL-0068. Where sampling conducted by the customer, results relate to the accuracy of the information provided, and as the samples are received.

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IA-11B L1119007-12 20

IA-12B L1119007-13 21

IA-13B L1119007-14 22

IA-14B L1119007-15 23

IA-15B L1119007-16 24

IA-17B L1119007-17 25

IA-18B L1119007-18 26

IA-19B L1119007-19 27

IA-20B L1119007-20 28

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1 Cp
2 Tc
3 Ss
4 Cn
5 Ds
6 Sr
7 Qc
8 Gl
9 Al
10 Sc

IA-1B L1119007-01 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 08:30	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1312594	1	07/17/19 23:00	07/17/19 23:00	AMC	Mt. Juliet, TN

IA-2B L1119007-02 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 08:35	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1312594	1	07/17/19 23:43	07/17/19 23:43	AMC	Mt. Juliet, TN

IA-3B L1119007-03 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 08:40	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1312594	1	07/18/19 00:26	07/18/19 00:26	AMC	Mt. Juliet, TN

IA-4B L1119007-04 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 08:45	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1312594	1	07/18/19 01:09	07/18/19 01:09	AMC	Mt. Juliet, TN

IA-5B L1119007-05 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 09:53	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1312594	1	07/18/19 01:52	07/18/19 01:52	AMC	Mt. Juliet, TN

IA-6B L1119007-06 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 09:51	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 13:41	07/18/19 13:41	AMC	Mt. Juliet, TN

IA-7B L1119007-07 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 09:52	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 14:24	07/18/19 14:24	AMC	Mt. Juliet, TN

IA-16B L1119007-08 Air

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 09:50	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 15:06	07/18/19 15:06	AMC	Mt. Juliet, TN

IA-8B L1119007-09 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:49 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 15:49	07/18/19 15:49	AMC	Mt. Juliet, TN

IA-9B L1119007-10 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:45 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 16:32	07/18/19 16:32	AMC	Mt. Juliet, TN

IA-10B L1119007-11 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:47 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 17:14	07/18/19 17:14	AMC	Mt. Juliet, TN

IA-11B L1119007-12 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:42 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 17:57	07/18/19 17:57	AMC	Mt. Juliet, TN

IA-12B L1119007-13 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:40 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 18:39	07/18/19 18:39	AMC	Mt. Juliet, TN

IA-13B L1119007-14 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:35 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 19:21	07/18/19 19:21	AMC	Mt. Juliet, TN

IA-14B L1119007-15 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:38 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 20:04	07/18/19 20:04	AMC	Mt. Juliet, TN

IA-15B L1119007-16 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:33 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 20:47	07/18/19 20:47	AMC	Mt. Juliet, TN

IA-17B L1119007-17 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 10:10 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 21:29	07/18/19 21:29	AMC	Mt. Juliet, TN

IA-18B L1119007-18 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 10:05 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 22:12	07/18/19 22:12	AMC	Mt. Juliet, TN

IA-19B L1119007-19 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 09:55 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 22:55	07/18/19 22:55	AMC	Mt. Juliet, TN

IA-20B L1119007-20 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 10:00 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/18/19 23:38	07/18/19 23:38	AMC	Mt. Juliet, TN

AA-1B L1119007-21 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 08:20 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/19/19 00:21	07/19/19 00:21	AMC	Mt. Juliet, TN

AA-2B L1119007-22 Air

Collected by: Dash Geyer | Collected date/time: 07/12/19 08:25 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Volatile Organic Compounds (MS) by Method TO-15	WG1313521	1	07/19/19 01:04	07/19/19 01:04	AMC	Mt. Juliet, TN

INTERMEDIATE L1119007-23 Solid

Collected by: Dash Geyer | Collected date/time: 07/12/19 10:35 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Total Solids by Method 2540 G-2011	WG1314814	1	07/22/19 08:25	07/22/19 08:36	KBC	Mt. Juliet, TN
Volatile Organic Compounds (GC/MS) by Method 8260B	WG1315153	792	07/18/19 16:41	07/22/19 04:03	DWR	Mt. Juliet, TN
Volatile Organic Compounds (GC/MS) by Method 8260B	WG1315447	7920	07/18/19 16:41	07/22/19 23:38	ACG	Mt. Juliet, TN

INTERMEDIATE L1119007-24 Waste

Collected by: Dash Geyer | Collected date/time: 07/12/19 10:35 | Received date/time: 07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Preparation by Method 1311	WG1312760	1	07/17/19 11:21	07/17/19 11:21	RT	Mt. Juliet, TN
Volatile Organic Compounds (GC/MS) by Method 8260B	WG1313377	1	07/18/19 13:46	07/18/19 13:46	ACG	Mt. Juliet, TN

EFFLUENT L1119007-25 Solid

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 10:15	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Total Solids by Method 2540 G-2011	WG1314814	1	07/22/19 08:25	07/22/19 08:36	KBC	Mt. Juliet, TN
Volatile Organic Compounds (GC/MS) by Method 8260B	WG1315447	198	07/18/19 16:41	07/22/19 23:57	ACG	Mt. Juliet, TN

EFFLUENT L1119007-26 Waste

Collected by	Collected date/time	Received date/time
Dash Geyer	07/12/19 10:15	07/16/19 08:45

Method	Batch	Dilution	Preparation date/time	Analysis date/time	Analyst	Location
Preparation by Method 1311	WG1312760	1	07/17/19 11:21	07/17/19 11:21	RT	Mt. Juliet, TN
Volatile Organic Compounds (GC/MS) by Method 8260B	WG1313377	1	07/18/19 14:06	07/18/19 14:06	ACG	Mt. Juliet, TN

1 Cp
2 Tc
3 Ss
4 Cn
5 Ds
6 Sr
7 Qc
8 Gl
9 Al
10 Sc

All sample aliquots were received at the correct temperature, in the proper containers, with the appropriate preservatives, and within method specified holding times, unless qualified or notated within the report. Where applicable, all MDL (LOD) and RDL (LOQ) values reported for environmental samples have been corrected for the dilution factor used in the analysis. All Method and Batch Quality Control are within established criteria except where addressed in this case narrative, a non-conformance form or properly qualified within the sample results. By my digital signature below, I affirm to the best of my knowledge, all problems/anomalies observed by the laboratory as having the potential to affect the quality of the data have been identified by the laboratory, and no information or data have been knowingly withheld that would affect the quality of the data.

Brian Ford

Brian Ford
Project Manager

Volatile Organic Compounds (MS) by Method TO-15

Client ID	Lab Sample ID	Analyte	CAS #	Mol. Wt.	RDL1	RDL2	Result	Result	Qualifier	Dilution	Batch
					ppbv	ug/m3	ppbv	ug/m3			
IA-1B	L1119007-01	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0301	0.204		1	WG1312594
IA-2B	L1119007-02	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0372	0.253		1	WG1312594
IA-3B	L1119007-03	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0446	0.303		1	WG1312594
IA-4B	L1119007-04	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0608	0.413		1	WG1312594
IA-5B	L1119007-05	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0251	0.170		1	WG1312594
IA-6B	L1119007-06	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0328	0.222		1	WG1313521
IA-7B	L1119007-07	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0994	0.675		1	WG1313521
IA-16B	L1119007-08	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0323	0.220		1	WG1313521
IA-8B	L1119007-09	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.406	2.76		1	WG1313521
IA-9B	L1119007-10	Tetrachloroethylene	127-18-4	166	0.0200	0.136	2.68	18.2		1	WG1313521
IA-10B	L1119007-11	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.642	4.36		1	WG1313521
IA-11B	L1119007-12	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.883	6.00		1	WG1313521
IA-12B	L1119007-13	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0239	0.162		1	WG1313521
IA-13B	L1119007-14	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0359	0.244		1	WG1313521
IA-14B	L1119007-15	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.108	0.731		1	WG1313521
IA-15B	L1119007-16	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0665	0.451		1	WG1313521
IA-17B	L1119007-17	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.151	1.02		1	WG1313521
IA-18B	L1119007-18	Tetrachloroethylene	127-18-4	166	0.0200	0.136	1.33	9.06		1	WG1313521
IA-19B	L1119007-19	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.308	2.09		1	WG1313521
IA-20B	L1119007-20	Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0769	0.522		1	WG1313521

Volatile Organic Compounds (GC/MS) by Method 8260B

Client ID	Lab Sample ID	Analyte	Result (dry)	Qualifier	MDL (dry)	RDL (dry)	Dilution	Analysis	Batch
			mg/kg		mg/kg	mg/kg		date / time	
INTERMEDIATE	L1119007-23	Chloroform	0.954	J	0.409	2.46	792	07/22/2019 04:03	WG1315153
INTERMEDIATE	L1119007-23	cis-1,2-Dichloroethene	27.7		0.679	2.46	792	07/22/2019 04:03	WG1315153
INTERMEDIATE	L1119007-23	Tetrachloroethene	4170		6.89	24.6	7920	07/22/2019 23:38	WG1315447
INTERMEDIATE	L1119007-23	Trichloroethene	177		0.394	0.985	792	07/22/2019 04:03	WG1315153
EFFLUENT	L1119007-25	Benzene	0.720		0.0972	0.243	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	Chloroform	7.63		0.101	0.608	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	1,1-Dichloroethane	0.257	J	0.140	0.608	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	1,1-Dichloroethene	0.347	J	0.122	0.608	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	cis-1,2-Dichloroethene	80.5		0.168	0.608	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	Ethylbenzene	0.966		0.129	0.608	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	Methyl tert-butyl ether	1.01		0.0717	0.243	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	1,1,2-Trichlorotrifluoroethane	0.606	J	0.164	0.608	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	Toluene	3.54		0.304	1.22	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	1,2,4-Trimethylbenzene	0.776	J	0.282	1.22	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	1,2,3-Trimethylbenzene	0.325	J	0.280	1.22	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	1,3,5-Trimethylbenzene	0.304	J	0.263	1.22	198	07/22/2019 23:57	WG1315447
EFFLUENT	L1119007-25	Xylenes, Total	2.63		1.16	1.58	198	07/22/2019 23:57	WG1315447

Volatile Organic Compounds (GC/MS) by Method 8260B

Client ID	Lab Sample ID	Analyte	Result	Qualifier	RDL	Limit	Dilution	Analysis	Batch
			mg/l		mg/l	mg/l		date / time	
INTERMEDIATE	L1119007-24	Tetrachloroethene	0.165		0.0500	0.70	1	07/18/2019 13:46	WG1313377

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0301	0.204		1	WG1312594
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*106*				WG1312594

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0372	0.253		1	WG1312594
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*113*				WG1312594

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0446	0.303		1	WG1312594
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*109*				WG1312594

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0608	0.413		1	WG1312594
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*110*				WG1312594

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0251	0.170		1	WG1312594
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*114*				WG1312594

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0328	0.222		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*112*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0994	0.675		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*112*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0323	0.220		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*117*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.406	2.76		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*114*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	2.68	18.2		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*116*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.642	4.36		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*112*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.883	6.00		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*113*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0239	0.162		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*109*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0359	0.244		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*113*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.108	0.731		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*108*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0665	0.451		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*110*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.151	1.02		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*113*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	1.33	9.06		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*110*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.308	2.09		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*112*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	0.0769	0.522		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*111*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	ND	ND		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*104*				WG1313521

Volatile Organic Compounds (MS) by Method TO-15

Analyte	CAS #	Mol. Wt.	RDL1 ppbv	RDL2 ug/m3	Result ppbv	Result ug/m3	Qualifier	Dilution	Batch
Tetrachloroethylene	127-18-4	166	0.0200	0.136	ND	ND		1	WG1313521
(S) 1,4-Bromofluorobenzene	*460-00-4*	*175*	*60.0-140*		*107*				WG1313521

Total Solids by Method 2540 G-2011

Analyte	Result %	Qualifier	Dilution	Analysis date / time	Batch
Total Solids	80.4		1	07/22/2019 08:36	WG1314814

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result (dry) mg/kg	Qualifier	MDL (dry) mg/kg	RDL (dry) mg/kg	Dilution	Analysis date / time	Batch
Acetone	U		13.4	24.6	792	07/22/2019 04:03	WG1315153
Acrylonitrile	U		1.86	12.3	792	07/22/2019 04:03	WG1315153
Benzene	U		0.394	0.985	792	07/22/2019 04:03	WG1315153
Bromobenzene	U		1.03	12.3	792	07/22/2019 04:03	WG1315153
Bromodichloromethane	U		0.776	2.46	792	07/22/2019 04:03	WG1315153
Bromoform	U		5.89	24.6	792	07/22/2019 04:03	WG1315153
Bromomethane	U		3.64	12.3	792	07/22/2019 04:03	WG1315153
n-Butylbenzene	U		3.78	12.3	792	07/22/2019 04:03	WG1315153
sec-Butylbenzene	U		2.49	12.3	792	07/22/2019 04:03	WG1315153
tert-Butylbenzene	U		1.53	4.92	792	07/22/2019 04:03	WG1315153
Carbon disulfide	U		4.00	12.3	792	07/22/2019 04:03	WG1315153
Carbon tetrachloride	U		1.06	4.92	792	07/22/2019 04:03	WG1315153
Chlorobenzene	U		0.564	2.46	792	07/22/2019 04:03	WG1315153
Chlorodibromomethane	U		0.443	2.46	792	07/22/2019 04:03	WG1315153
Chloroethane	U		1.06	4.92	792	07/22/2019 04:03	WG1315153
Chloroform	0.954	J	0.409	2.46	792	07/22/2019 04:03	WG1315153
Chloromethane	U		1.37	12.3	792	07/22/2019 04:03	WG1315153
2-Chlorotoluene	U		0.906	2.46	792	07/22/2019 04:03	WG1315153
4-Chlorotoluene	U		1.11	4.92	792	07/22/2019 04:03	WG1315153
1,2-Dibromo-3-Chloropropane	U		5.02	24.6	792	07/22/2019 04:03	WG1315153
1,2-Dibromoethane	U		0.517	2.46	792	07/22/2019 04:03	WG1315153
Dibromomethane	U		0.985	4.92	792	07/22/2019 04:03	WG1315153
1,2-Dichlorobenzene	U		1.43	4.92	792	07/22/2019 04:03	WG1315153
1,3-Dichlorobenzene	U		1.68	4.92	792	07/22/2019 04:03	WG1315153
1,4-Dichlorobenzene	U		1.94	4.92	792	07/22/2019 04:03	WG1315153
Dichlorodifluoromethane	U		0.806	2.46	792	07/22/2019 04:03	WG1315153
1,1-Dichloroethane	U		0.566	2.46	792	07/22/2019 04:03	WG1315153
1,2-Dichloroethane	U		0.467	2.46	792	07/22/2019 04:03	WG1315153
1,1-Dichloroethene	U		0.492	2.46	792	07/22/2019 04:03	WG1315153
cis-1,2-Dichloroethene	27.7		0.679	2.46	792	07/22/2019 04:03	WG1315153
trans-1,2-Dichloroethene	U		1.40	4.92	792	07/22/2019 04:03	WG1315153
1,2-Dichloropropane	U		1.24	4.92	792	07/22/2019 04:03	WG1315153
1,1-Dichloropropene	U		0.689	2.46	792	07/22/2019 04:03	WG1315153
1,3-Dichloropropane	U		1.73	4.92	792	07/22/2019 04:03	WG1315153
cis-1,3-Dichloropropene	U		0.668	2.46	792	07/22/2019 04:03	WG1315153
trans-1,3-Dichloropropene	U		1.50	4.92	792	07/22/2019 04:03	WG1315153
2,2-Dichloropropane	U		0.781	2.46	792	07/22/2019 04:03	WG1315153
Di-isopropyl ether	U		0.344	0.985	792	07/22/2019 04:03	WG1315153
Ethylbenzene	U		0.522	2.46	792	07/22/2019 04:03	WG1315153
Hexachloro-1,3-butadiene	U		12.4	24.6	792	07/22/2019 04:03	WG1315153
Isopropylbenzene	U		0.849	2.46	792	07/22/2019 04:03	WG1315153
p-Isopropyltoluene	U		2.29	4.92	792	07/22/2019 04:03	WG1315153
2-Butanone (MEK)	U		12.3	24.6	792	07/22/2019 04:03	WG1315153
Methylene Chloride	U		6.54	24.6	792	07/22/2019 04:03	WG1315153
4-Methyl-2-pentanone (MIBK)	U		9.85	24.6	792	07/22/2019 04:03	WG1315153
Methyl tert-butyl ether	U		0.291	0.985	792	07/22/2019 04:03	WG1315153
Naphthalene	U		3.07	12.3	792	07/22/2019 04:03	WG1315153
n-Propylbenzene	U		1.16	4.92	792	07/22/2019 04:03	WG1315153
Styrene	U		2.69	12.3	792	07/22/2019 04:03	WG1315153
1,1,1,2-Tetrachloroethane	U		0.492	2.46	792	07/22/2019 04:03	WG1315153

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result (dry) mg/kg	Qualifier	MDL (dry) mg/kg	RDL (dry) mg/kg	Dilution	Analysis date / time	Batch
1,1,2,2-Tetrachloroethane	U		0.384	2.46	792	07/22/2019 04:03	WG1315153
1,1,2-Trichlorotrifluoroethane	U		0.665	2.46	792	07/22/2019 04:03	WG1315153
Tetrachloroethene	4170		6.89	24.6	7920	07/22/2019 23:38	WG1315447
Toluene	U		1.23	4.92	792	07/22/2019 04:03	WG1315153
1,2,3-Trichlorobenzene	U		0.615	2.46	792	07/22/2019 04:03	WG1315153
1,2,4-Trichlorobenzene	U		4.75	12.3	792	07/22/2019 04:03	WG1315153
1,1,1-Trichloroethane	U		0.271	2.46	792	07/22/2019 04:03	WG1315153
1,1,2-Trichloroethane	U		0.869	2.46	792	07/22/2019 04:03	WG1315153
Trichloroethene	177		0.394	0.985	792	07/22/2019 04:03	WG1315153
Trichlorofluoromethane	U		0.492	2.46	792	07/22/2019 04:03	WG1315153
1,2,3-Trichloropropane	U		5.02	12.3	792	07/22/2019 04:03	WG1315153
1,2,4-Trimethylbenzene	U		1.14	4.92	792	07/22/2019 04:03	WG1315153
1,2,3-Trimethylbenzene	U		1.13	4.92	792	07/22/2019 04:03	WG1315153
Vinyl chloride	U		0.673	2.46	792	07/22/2019 04:03	WG1315153
1,3,5-Trimethylbenzene	U		1.06	4.92	792	07/22/2019 04:03	WG1315153
Xylenes, Total	U		4.70	6.40	792	07/22/2019 04:03	WG1315153
(S) Toluene-d8	*104*			*75.0-131*		*07/22/2019 04:03*	WG1315153
(S) Toluene-d8	*98.6*			*75.0-131*		*07/22/2019 23:38*	WG1315447
(S) 4-Bromofluorobenzene	*102*			*67.0-138*		*07/22/2019 04:03*	WG1315153
(S) 4-Bromofluorobenzene	*95.3*			*67.0-138*		*07/22/2019 23:38*	WG1315447
(S) 1,2-Dichloroethane-d4	*118*			*70.0-130*		*07/22/2019 04:03*	WG1315153
(S) 1,2-Dichloroethane-d4	*117*			*70.0-130*		*07/22/2019 23:38*	WG1315447

Preparation by Method 1311

Analyte	Result	Qualifier	Prep date / time	Batch
TCLP ZHE Extraction	-		7/17/2019 11:21:13 AM	WG1312760

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result mg/l	Qualifier	RDL mg/l	Limit mg/l	Dilution	Analysis date / time	Batch
Benzene	ND		0.0500	0.50	1	07/18/2019 13:46	WG1313377
Carbon tetrachloride	ND		0.0500	0.50	1	07/18/2019 13:46	WG1313377
Chlorobenzene	ND		0.0500	100	1	07/18/2019 13:46	WG1313377
Chloroform	ND		0.250	6	1	07/18/2019 13:46	WG1313377
1,2-Dichloroethane	ND		0.0500	0.50	1	07/18/2019 13:46	WG1313377
1,1-Dichloroethene	ND		0.0500	0.70	1	07/18/2019 13:46	WG1313377
2-Butanone (MEK)	ND	J4	0.500	200	1	07/18/2019 13:46	WG1313377
Tetrachloroethene	0.165		0.0500	0.70	1	07/18/2019 13:46	WG1313377
Trichloroethene	ND		0.0500	0.50	1	07/18/2019 13:46	WG1313377
Vinyl chloride	ND		0.0500	0.20	1	07/18/2019 13:46	WG1313377
(S) Toluene-d8	*108*		*80.0-120*			*07/18/2019 13:46*	WG1313377
(S) 4-Bromofluorobenzene	*102*		*77.0-126*			*07/18/2019 13:46*	WG1313377
(S) 1,2-Dichloroethane-d4	*88.3*		*70.0-130*			*07/18/2019 13:46*	WG1313377

Total Solids by Method 2540 G-2011

Analyte	Result %	Qualifier	Dilution	Analysis date / time	Batch
Total Solids	81.5		1	07/22/2019 08:36	WG1314814

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result (dry) mg/kg	Qualifier	MDL (dry) mg/kg	RDL (dry) mg/kg	Dilution	Analysis date / time	Batch
Acetone	U		3.33	6.08	198	07/22/2019 23:57	WG1315447
Acrylonitrile	U		0.462	3.04	198	07/22/2019 23:57	WG1315447
Benzene	0.720		0.0972	0.243	198	07/22/2019 23:57	WG1315447
Bromobenzene	U		0.255	3.04	198	07/22/2019 23:57	WG1315447
Bromodichloromethane	U		0.191	0.608	198	07/22/2019 23:57	WG1315447
Bromoform	U		1.45	6.08	198	07/22/2019 23:57	WG1315447
Bromomethane	U		0.900	3.04	198	07/22/2019 23:57	WG1315447
n-Butylbenzene	U		0.933	3.04	198	07/22/2019 23:57	WG1315447
sec-Butylbenzene	U		0.615	3.04	198	07/22/2019 23:57	WG1315447
tert-Butylbenzene	U		0.377	1.22	198	07/22/2019 23:57	WG1315447
Carbon disulfide	U		0.987	3.04	198	07/22/2019 23:57	WG1315447
Carbon tetrachloride	U		0.263	1.22	198	07/22/2019 23:57	WG1315447
Chlorobenzene	U		0.139	0.608	198	07/22/2019 23:57	WG1315447
Chlorodibromomethane	U		0.109	0.608	198	07/22/2019 23:57	WG1315447
Chloroethane	U		0.263	1.22	198	07/22/2019 23:57	WG1315447
Chloroform	7.63		0.101	0.608	198	07/22/2019 23:57	WG1315447
Chloromethane	U		0.338	3.04	198	07/22/2019 23:57	WG1315447
2-Chlorotoluene	U	J4	0.223	0.608	198	07/22/2019 23:57	WG1315447
4-Chlorotoluene	U		0.275	1.22	198	07/22/2019 23:57	WG1315447
1,2-Dibromo-3-Chloropropane	U		1.24	6.08	198	07/22/2019 23:57	WG1315447
1,2-Dibromoethane	U		0.128	0.608	198	07/22/2019 23:57	WG1315447
Dibromomethane	U		0.243	1.22	198	07/22/2019 23:57	WG1315447
1,2-Dichlorobenzene	U		0.352	1.22	198	07/22/2019 23:57	WG1315447
1,3-Dichlorobenzene	U		0.414	1.22	198	07/22/2019 23:57	WG1315447
1,4-Dichlorobenzene	U		0.479	1.22	198	07/22/2019 23:57	WG1315447
Dichlorodifluoromethane	U		0.199	0.608	198	07/22/2019 23:57	WG1315447
1,1-Dichloroethane	0.257	J	0.140	0.608	198	07/22/2019 23:57	WG1315447
1,2-Dichloroethane	U		0.115	0.608	198	07/22/2019 23:57	WG1315447
1,1-Dichloroethene	0.347	J	0.122	0.608	198	07/22/2019 23:57	WG1315447
cis-1,2-Dichloroethene	80.5		0.168	0.608	198	07/22/2019 23:57	WG1315447
trans-1,2-Dichloroethene	U		0.347	1.22	198	07/22/2019 23:57	WG1315447
1,2-Dichloropropane	U		0.308	1.22	198	07/22/2019 23:57	WG1315447
1,1-Dichloropropene	U		0.171	0.608	198	07/22/2019 23:57	WG1315447
1,3-Dichloropropane	U		0.425	1.22	198	07/22/2019 23:57	WG1315447
cis-1,3-Dichloropropene	U		0.164	0.608	198	07/22/2019 23:57	WG1315447
trans-1,3-Dichloropropene	U		0.372	1.22	198	07/22/2019 23:57	WG1315447
2,2-Dichloropropane	U		0.193	0.608	198	07/22/2019 23:57	WG1315447
Di-isopropyl ether	U		0.0851	0.243	198	07/22/2019 23:57	WG1315447
Ethylbenzene	0.966		0.129	0.608	198	07/22/2019 23:57	WG1315447
Hexachloro-1,3-butadiene	U		3.08	6.08	198	07/22/2019 23:57	WG1315447
Isopropylbenzene	U		0.210	0.608	198	07/22/2019 23:57	WG1315447
p-Isopropyltoluene	U		0.566	1.22	198	07/22/2019 23:57	WG1315447
2-Butanone (MEK)	U		3.04	6.08	198	07/22/2019 23:57	WG1315447
Methylene Chloride	U		1.61	6.08	198	07/22/2019 23:57	WG1315447
4-Methyl-2-pentanone (MIBK)	U		2.43	6.08	198	07/22/2019 23:57	WG1315447
Methyl tert-butyl ether	1.01		0.0717	0.243	198	07/22/2019 23:57	WG1315447
Naphthalene	U		0.759	3.04	198	07/22/2019 23:57	WG1315447
n-Propylbenzene	U		0.287	1.22	198	07/22/2019 23:57	WG1315447
Styrene	U		0.663	3.04	198	07/22/2019 23:57	WG1315447
1,1,1,2-Tetrachloroethane	U		0.122	0.608	198	07/22/2019 23:57	WG1315447

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result (dry) mg/kg	Qualifier	MDL (dry) mg/kg	RDL (dry) mg/kg	Dilution	Analysis date / time	Batch
1,1,2,2-Tetrachloroethane	U		0.0948	0.608	198	07/22/2019 23:57	WG1315447
1,1,2-Trichlorotrifluoroethane	0.606	J	0.164	0.608	198	07/22/2019 23:57	WG1315447
Tetrachloroethene	U		0.171	0.608	198	07/22/2019 23:57	WG1315447
Toluene	3.54		0.304	1.22	198	07/22/2019 23:57	WG1315447
1,2,3-Trichlorobenzene	U		0.152	0.608	198	07/22/2019 23:57	WG1315447
1,2,4-Trichlorobenzene	U		1.17	3.04	198	07/22/2019 23:57	WG1315447
1,1,1-Trichloroethane	U		0.0668	0.608	198	07/22/2019 23:57	WG1315447
1,1,2-Trichloroethane	U		0.215	0.608	198	07/22/2019 23:57	WG1315447
Trichloroethene	U		0.0972	0.243	198	07/22/2019 23:57	WG1315447
Trichlorofluoromethane	U		0.122	0.608	198	07/22/2019 23:57	WG1315447
1,2,3-Trichloropropane	U		1.24	3.04	198	07/22/2019 23:57	WG1315447
1,2,4-Trimethylbenzene	0.776	J	0.282	1.22	198	07/22/2019 23:57	WG1315447
1,2,3-Trimethylbenzene	0.325	J	0.280	1.22	198	07/22/2019 23:57	WG1315447
Vinyl chloride	U		0.166	0.608	198	07/22/2019 23:57	WG1315447
1,3,5-Trimethylbenzene	0.304	J	0.263	1.22	198	07/22/2019 23:57	WG1315447
Xylenes, Total	2.63		1.16	1.58	198	07/22/2019 23:57	WG1315447
(S) Toluene-d8	*96.1*			*75.0-131*		*07/22/2019 23:57*	WG1315447
(S) 4-Bromofluorobenzene	*91.2*			*67.0-138*		*07/22/2019 23:57*	WG1315447
(S) 1,2-Dichloroethane-d4	*119*			*70.0-130*		*07/22/2019 23:57*	WG1315447

Preparation by Method 1311

Analyte	Result	Qualifier	Prep date / time	Batch
TCLP ZHE Extraction	-		7/17/2019 11:21:13 AM	WG1312760

Volatile Organic Compounds (GC/MS) by Method 8260B

Analyte	Result mg/l	Qualifier	RDL mg/l	Limit mg/l	Dilution	Analysis date / time	Batch
Benzene	ND		0.0500	0.50	1	07/18/2019 14:06	WG1313377
Carbon tetrachloride	ND		0.0500	0.50	1	07/18/2019 14:06	WG1313377
Chlorobenzene	ND		0.0500	100	1	07/18/2019 14:06	WG1313377
Chloroform	ND		0.250	6	1	07/18/2019 14:06	WG1313377
1,2-Dichloroethane	ND		0.0500	0.50	1	07/18/2019 14:06	WG1313377
1,1-Dichloroethene	ND		0.0500	0.70	1	07/18/2019 14:06	WG1313377
2-Butanone (MEK)	ND	J4	0.500	200	1	07/18/2019 14:06	WG1313377
Tetrachloroethene	ND		0.0500	0.70	1	07/18/2019 14:06	WG1313377
Trichloroethene	ND		0.0500	0.50	1	07/18/2019 14:06	WG1313377
Vinyl chloride	ND		0.0500	0.20	1	07/18/2019 14:06	WG1313377
(S) Toluene-d8	*106*		*80.0-120*			*07/18/2019 14:06*	WG1313377
(S) 4-Bromofluorobenzene	*100*		*77.0-126*			*07/18/2019 14:06*	WG1313377
(S) 1,2-Dichloroethane-d4	*87.0*		*70.0-130*			*07/18/2019 14:06*	WG1313377

Method Blank (MB)

(MB) R3433270-1 07/22/19 08:36

Analyte	MB Result %	MB Qualifier	MB MDL %	MB RDL %
Total Solids	0.000			

L1119009-07 Original Sample (OS) • Duplicate (DUP)

(OS) L1119009-07 07/22/19 08:36 • (DUP) R3433270-3 07/22/19 08:36

Analyte	Original Result %	DUP Result %	Dilution	DUP RPD %	DUP Qualifier	DUP RPD Limits %
Total Solids	86.2	86.0	1	0.250		10

Laboratory Control Sample (LCS)

(LCS) R3433270-2 07/22/19 08:36

Analyte	Spike Amount %	LCS Result %	LCS Rec. %	Rec. Limits %	LCS Qualifier
Total Solids	50.0	50.0	100	85.0-115	

Method Blank (MB)

(MB) R3431732-3 07/17/19 11:55

Analyte	MB Result ppbv	MB Qualifier	MB MDL ppbv	MB RDL ppbv
Tetrachloroethylene	U		0.00457	0.0200
(S) 1,4-Bromofluorobenzene	*96.7*			*60.0-140*

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3431732-1 07/17/19 09:48 • (LCSD) R3431732-2 07/17/19 10:30

Analyte	Spike Amount ppbv	LCS Result ppbv	LCSD Result ppbv	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Tetrachloroethylene	0.500	0.533	0.539	107	108	70.0-130			1.01	25
(S) 1,4-Bromofluorobenzene				*101*	*103*	*60.0-140*				

Method Blank (MB)

(MB) R3432175-2 07/18/19 09:54

Analyte	MB Result ppbv	MB Qualifier	MB MDL ppbv	MB RDL ppbv
Tetrachloroethylene	U		0.00457	0.0200
(S) 1,4-Bromofluorobenzene	*84.5*			*60.0-140*

Laboratory Control Sample (LCS) • Laboratory Control Sample Duplicate (LCSD)

(LCS) R3432175-1 07/18/19 09:11 • (LCSD) R3432175-3 07/18/19 10:36

Analyte	Spike Amount ppbv	LCS Result ppbv	LCSD Result ppbv	LCS Rec. %	LCSD Rec. %	Rec. Limits %	LCS Qualifier	LCSD Qualifier	RPD %	RPD Limits %
Tetrachloroethylene	0.500	0.544	0.547	109	109	70.0-130			0.509	25
(S) 1,4-Bromofluorobenzene				*96.6*	*101*	*60.0-140*				

Method Blank (MB)

(MB) R3432661-2 07/18/19 10:25

Analyte	MB Result mg/l	MB Qualifier	MB MDL mg/l	MB RDL mg/l
Benzene	U		0.0165	0.0500
Carbon tetrachloride	U		0.0165	0.0500
Chlorobenzene	U		0.0165	0.0500
Chloroform	U		0.0825	0.250
1,2-Dichloroethane	U		0.0165	0.0500
1,1-Dichloroethene	U		0.0165	0.0500
2-Butanone (MEK)	U		0.165	0.500
Tetrachloroethene	U		0.0165	0.0500
Trichloroethene	U		0.0165	0.0500
Vinyl chloride	U		0.0165	0.0500
(S) Toluene-d8	*109*			*80.0-120*
(S) 4-Bromofluorobenzene	*98.7*			*77.0-126*
(S) 1,2-Dichloroethane-d4	*76.3*			*70.0-130*

Laboratory Control Sample (LCS)

(LCS) R3432661-1 07/18/19 09:05

Analyte	Spike Amount mg/l	LCS Result mg/l	LCS Rec. %	Rec. Limits %	LCS Qualifier
Benzene	0.0250	0.0245	98.0	70.0-123	
Carbon tetrachloride	0.0250	0.0250	100	68.0-126	
Chlorobenzene	0.0250	0.0257	103	80.0-121	
Chloroform	0.0250	0.0250	100	73.0-120	
1,2-Dichloroethane	0.0250	0.0176	70.5	70.0-128	
1,1-Dichloroethene	0.0250	0.0254	102	71.0-124	
2-Butanone (MEK)	0.125	0.0397	31.8	44.0-160	J4
Tetrachloroethene	0.0250	0.0268	107	72.0-132	
Trichloroethene	0.0250	0.0261	105	78.0-124	
Vinyl chloride	0.0250	0.0228	91.3	67.0-131	
(S) Toluene-d8			*109*	*80.0-120*	
(S) 4-Bromofluorobenzene			*96.2*	*77.0-126*	
(S) 1,2-Dichloroethane-d4			*82.1*	*70.0-130*	

L1119049-01 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1119049-01 07/18/19 14:46 • (MS) R3432661-3 07/18/19 15:06 • (MSD) R3432661-4 07/18/19 15:26

Analyte	Spike Amount mg/l	Original Result mg/l	MS Result mg/l	MSD Result mg/l	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Benzene	1.25	ND	1.03	1.12	82.6	89.2	1	17.0-158			7.70	27
Carbon tetrachloride	1.25	ND	1.10	1.23	88.0	98.1	1	23.0-159			10.8	28
Chlorobenzene	1.25	ND	1.17	1.25	93.4	100	1	33.0-152			6.89	27
Chloroform	1.25	ND	1.10	1.18	88.2	94.5	1	29.0-154			6.89	28
1,2-Dichloroethane	1.25	ND	0.985	1.00	78.8	80.3	1	29.0-151			1.85	27
1,1-Dichloroethene	1.25	ND	1.18	1.18	94.7	94.0	1	11.0-160			0.680	29
2-Butanone (MEK)	6.25	ND	3.57	3.46	57.1	55.4	1	10.0-160			3.05	32
Tetrachloroethene	1.25	ND	1.10	1.22	88.0	97.6	1	10.0-160			10.4	27
Trichloroethene	1.25	ND	1.09	1.20	87.4	95.7	1	10.0-160			9.12	25
Vinyl chloride	1.25	ND	0.858	0.972	68.7	77.7	1	10.0-160			12.4	27
(S) Toluene-d8					*105*	*108*		*80.0-120*				
(S) 4-Bromofluorobenzene					*99.5*	*103*		*77.0-126*				
(S) 1,2-Dichloroethane-d4					*99.0*	*100*		*70.0-130*				

Method Blank (MB)

(MB) R3432932-2 07/21/19 21:10

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Acetone	U		0.0137	0.0250
Acrylonitrile	U		0.00190	0.0125
Benzene	U		0.000400	0.00100
Bromobenzene	U		0.00105	0.0125
Bromodichloromethane	U		0.000788	0.00250
Bromoform	U		0.00598	0.0250
Bromomethane	U		0.00370	0.0125
n-Butylbenzene	U		0.00384	0.0125
sec-Butylbenzene	U		0.00253	0.0125
tert-Butylbenzene	U		0.00155	0.00500
Carbon disulfide	U		0.00406	0.0125
Carbon tetrachloride	U		0.00108	0.00500
Chlorobenzene	U		0.000573	0.00250
Chlorodibromomethane	U		0.000450	0.00250
Chloroethane	U		0.00108	0.00500
Chloroform	U		0.000415	0.00250
Chloromethane	U		0.00139	0.0125
2-Chlorotoluene	U		0.000920	0.00250
4-Chlorotoluene	U		0.00113	0.00500
1,2-Dibromo-3-Chloropropane	U		0.00510	0.0250
1,2-Dibromoethane	U		0.000525	0.00250
Dibromomethane	U		0.00100	0.00500
1,2-Dichlorobenzene	U		0.00145	0.00500
1,3-Dichlorobenzene	U		0.00170	0.00500
1,4-Dichlorobenzene	U		0.00197	0.00500
Dichlorodifluoromethane	U		0.000818	0.00250
1,1-Dichloroethane	U		0.000575	0.00250
1,2-Dichloroethane	U		0.000475	0.00250
1,1-Dichloroethene	U		0.000500	0.00250
cis-1,2-Dichloroethene	U		0.000690	0.00250
trans-1,2-Dichloroethene	U		0.00143	0.00500
1,2-Dichloropropane	U		0.00127	0.00500
1,1-Dichloropropene	U		0.000700	0.00250
1,3-Dichloropropane	U		0.00175	0.00500
cis-1,3-Dichloropropene	U		0.000678	0.00250
trans-1,3-Dichloropropene	U		0.00153	0.00500
2,2-Dichloropropane	U		0.000793	0.00250
Di-isopropyl ether	U		0.000350	0.00100
Ethylbenzene	U		0.000530	0.00250
Hexachloro-1,3-butadiene	U		0.0127	0.0250

Method Blank (MB)

(MB) R3432932-2 07/21/19 21:10

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Isopropylbenzene	U		0.000863	0.00250
p-Isopropyltoluene	U		0.00233	0.00500
2-Butanone (MEK)	0.0137	J	0.0125	0.0250
Methylene Chloride	U		0.00664	0.0250
4-Methyl-2-pentanone (MIBK)	U		0.0100	0.0250
Methyl tert-butyl ether	U		0.000295	0.00100
Naphthalene	U		0.00312	0.0125
n-Propylbenzene	U		0.00118	0.00500
Styrene	U		0.00273	0.0125
1,1,1,2-Tetrachloroethane	U		0.000500	0.00250
1,1,2,2-Tetrachloroethane	U		0.000390	0.00250
Toluene	U		0.00125	0.00500
1,1,2-Trichlorotrifluoroethane	U		0.000675	0.00250
1,2,3-Trichlorobenzene	U		0.000625	0.00250
1,2,4-Trichlorobenzene	U		0.00482	0.0125
1,1,1-Trichloroethane	U		0.000275	0.00250
1,1,2-Trichloroethane	U		0.000883	0.00250
Trichloroethene	U		0.000400	0.00100
Trichlorofluoromethane	U		0.000500	0.00250
1,2,3-Trichloropropane	U		0.00510	0.0125
1,2,3-Trimethylbenzene	U		0.00115	0.00500
1,2,4-Trimethylbenzene	U		0.00116	0.00500
1,3,5-Trimethylbenzene	U		0.00108	0.00500
Vinyl chloride	U		0.000683	0.00250
Xylenes, Total	U		0.00478	0.00650
(S) Toluene-d8	*110*			*75.0-131*
(S) 4-Bromofluorobenzene	*104*			*67.0-138*
(S) 1,2-Dichloroethane-d4	*103*			*70.0-130*

Laboratory Control Sample (LCS)

(LCS) R3432932-1 07/21/19 20:08

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Acetone	0.625	0.504	80.6	10.0-160	
Acrylonitrile	0.625	0.679	109	45.0-153	
Benzene	0.125	0.106	84.6	70.0-123	
Bromobenzene	0.125	0.137	110	73.0-121	
Bromodichloromethane	0.125	0.128	102	73.0-121	

Laboratory Control Sample (LCS)

(LCS) R3432932-1 07/21/19 20:08

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Bromoform	0.125	0.107	85.4	64.0-132	
Bromomethane	0.125	0.132	106	56.0-147	
n-Butylbenzene	0.125	0.119	94.9	68.0-135	
sec-Butylbenzene	0.125	0.125	100	74.0-130	
tert-Butylbenzene	0.125	0.103	82.5	75.0-127	
Carbon disulfide	0.125	0.117	93.9	56.0-133	
Carbon tetrachloride	0.125	0.130	104	66.0-128	
Chlorobenzene	0.125	0.108	86.0	76.0-128	
Chlorodibromomethane	0.125	0.125	99.8	74.0-127	
Chloroethane	0.125	0.103	82.2	61.0-134	
Chloroform	0.125	0.117	93.6	72.0-123	
Chloromethane	0.125	0.139	111	51.0-138	
2-Chlorotoluene	0.125	0.118	94.1	75.0-124	
4-Chlorotoluene	0.125	0.106	84.7	75.0-124	
1,2-Dibromo-3-Chloropropane	0.125	0.126	101	59.0-130	
1,2-Dibromoethane	0.125	0.109	87.0	74.0-128	
Dibromomethane	0.125	0.112	89.3	75.0-122	
1,2-Dichlorobenzene	0.125	0.117	93.4	76.0-124	
1,3-Dichlorobenzene	0.125	0.126	101	76.0-125	
1,4-Dichlorobenzene	0.125	0.0984	78.7	77.0-121	
Dichlorodifluoromethane	0.125	0.147	118	43.0-156	
1,1-Dichloroethane	0.125	0.144	115	70.0-127	
1,2-Dichloroethane	0.125	0.134	107	65.0-131	
1,1-Dichloroethene	0.125	0.131	105	65.0-131	
cis-1,2-Dichloroethene	0.125	0.120	95.6	73.0-125	
trans-1,2-Dichloroethene	0.125	0.119	95.5	71.0-125	
1,2-Dichloropropane	0.125	0.134	107	74.0-125	
1,1-Dichloropropene	0.125	0.110	88.2	73.0-125	
1,3-Dichloropropane	0.125	0.130	104	80.0-125	
cis-1,3-Dichloropropene	0.125	0.112	89.9	76.0-127	
trans-1,3-Dichloropropene	0.125	0.121	96.8	73.0-127	
2,2-Dichloropropane	0.125	0.133	106	59.0-135	
Di-isopropyl ether	0.125	0.125	99.7	60.0-136	
Ethylbenzene	0.125	0.116	92.7	74.0-126	
Hexachloro-1,3-butadiene	0.125	0.118	94.0	57.0-150	
Isopropylbenzene	0.125	0.105	84.1	72.0-127	
p-Isopropyltoluene	0.125	0.117	93.9	72.0-133	
2-Butanone (MEK)	0.625	0.713	114	30.0-160	
Methylene Chloride	0.125	0.112	89.5	68.0-123	
4-Methyl-2-pentanone (MIBK)	0.625	0.627	100	56.0-143	

Laboratory Control Sample (LCS)

(LCS) R3432932-1 07/21/19 20:08

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Methyl tert-butyl ether	0.125	0.120	96.1	66.0-132	
Naphthalene	0.125	0.138	110	59.0-130	
n-Propylbenzene	0.125	0.118	94.7	74.0-126	
Styrene	0.125	0.107	85.5	72.0-127	
1,1,1,2-Tetrachloroethane	0.125	0.126	101	74.0-129	
1,1,2,2-Tetrachloroethane	0.125	0.109	87.0	68.0-128	
Toluene	0.125	0.118	94.4	75.0-121	
1,1,2-Trichlorotrifluoroethane	0.125	0.119	95.0	61.0-139	
1,2,3-Trichlorobenzene	0.125	0.146	117	59.0-139	
1,2,4-Trichlorobenzene	0.125	0.121	96.9	62.0-137	
1,1,1-Trichloroethane	0.125	0.121	97.1	69.0-126	
1,1,2-Trichloroethane	0.125	0.115	91.9	78.0-123	
Trichloroethene	0.125	0.142	114	76.0-126	
Trichlorofluoromethane	0.125	0.128	103	61.0-142	
1,2,3-Trichloropropane	0.125	0.123	98.3	67.0-129	
1,2,3-Trimethylbenzene	0.125	0.116	93.1	74.0-124	
1,2,4-Trimethylbenzene	0.125	0.112	89.3	70.0-126	
1,3,5-Trimethylbenzene	0.125	0.127	101	73.0-127	
Vinyl chloride	0.125	0.117	93.6	63.0-134	
Xylenes, Total	0.375	0.333	88.8	72.0-127	
(S) Toluene-d8			*104*	*75.0-131*	
(S) 4-Bromofluorobenzene			*106*	*67.0-138*	
(S) 1,2-Dichloroethane-d4			*108*	*70.0-130*	

L1119030-03 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1119030-03 07/22/19 02:00 • (MS) R3432932-3 07/22/19 04:45 • (MSD) R3432932-4 07/22/19 05:06

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Acetone	0.625	U	0.325	0.352	52.0	56.3	1	10.0-160			7.88	40
Acrylonitrile	0.625	U	0.682	0.697	109	111	1	10.0-160			2.13	40
Benzene	0.125	U	0.102	0.108	81.7	86.3	1	10.0-149			5.52	37
Bromobenzene	0.125	U	0.142	0.147	114	118	1	10.0-156			3.33	38
Bromodichloromethane	0.125	U	0.127	0.130	101	104	1	10.0-143			2.31	37
Bromoform	0.125	U	0.101	0.103	80.9	82.3	1	10.0-146			1.66	36
Bromomethane	0.125	U	0.138	0.142	110	114	1	10.0-149			3.12	38
n-Butylbenzene	0.125	U	0.117	0.130	93.3	104	1	10.0-160			10.8	40
sec-Butylbenzene	0.125	U	0.123	0.135	98.5	108	1	10.0-159			8.92	39
tert-Butylbenzene	0.125	U	0.106	0.110	84.7	88.3	1	10.0-156			4.10	39

L1119030-03 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1119030-03 07/22/19 02:00 • (MS) R3432932-3 07/22/19 04:45 • (MSD) R3432932-4 07/22/19 05:06

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
Carbon disulfide	0.125	U	0.109	0.116	86.9	93.1	1	10.0-145			6.90	39
Carbon tetrachloride	0.125	U	0.137	0.146	110	117	1	10.0-145			6.31	37
Chlorobenzene	0.125	U	0.112	0.110	89.9	88.0	1	10.0-152			2.14	39
Chlorodibromomethane	0.125	U	0.124	0.129	99.1	103	1	10.0-146			3.76	37
Chloroethane	0.125	U	0.103	0.106	82.0	84.7	1	10.0-146			3.27	40
Chloroform	0.125	0.000544	0.123	0.124	98.1	98.5	1	10.0-146			0.390	37
Chloromethane	0.125	U	0.153	0.157	122	126	1	10.0-159			2.91	37
2-Chlorotoluene	0.125	U	0.122	0.129	97.4	104	1	10.0-159			6.14	38
4-Chlorotoluene	0.125	U	0.120	0.117	95.9	93.4	1	10.0-155			2.71	39
1,2-Dibromo-3-Chloropropane	0.125	U	0.0980	0.103	78.4	82.5	1	10.0-151			5.10	39
1,2-Dibromoethane	0.125	U	0.108	0.105	86.7	84.3	1	10.0-148			2.81	34
Dibromomethane	0.125	U	0.112	0.119	89.6	95.3	1	10.0-147			6.25	35
1,2-Dichlorobenzene	0.125	U	0.111	0.118	89.1	94.1	1	10.0-155			5.43	37
1,3-Dichlorobenzene	0.125	U	0.127	0.136	101	109	1	10.0-153			7.18	38
1,4-Dichlorobenzene	0.125	U	0.101	0.103	80.7	82.2	1	10.0-151			1.86	38
Dichlorodifluoromethane	0.125	U	0.174	0.186	140	149	1	10.0-160			6.61	35
1,1-Dichloroethane	0.125	U	0.144	0.151	115	121	1	10.0-147			4.83	37
1,2-Dichloroethane	0.125	U	0.143	0.154	114	123	1	10.0-148			7.42	35
1,1-Dichloroethene	0.125	U	0.138	0.151	110	121	1	10.0-155			9.29	37
cis-1,2-Dichloroethene	0.125	U	0.120	0.121	96.1	97.0	1	10.0-149			0.891	37
trans-1,2-Dichloroethene	0.125	U	0.116	0.120	92.8	96.0	1	10.0-150			3.48	37
1,2-Dichloropropane	0.125	U	0.130	0.136	104	109	1	10.0-148			4.26	37
1,1-Dichloropropene	0.125	U	0.115	0.115	91.9	92.3	1	10.0-153			0.417	35
1,3-Dichloropropane	0.125	U	0.125	0.127	100	102	1	10.0-154			1.45	35
cis-1,3-Dichloropropene	0.125	U	0.112	0.117	89.3	93.4	1	10.0-151			4.49	37
trans-1,3-Dichloropropene	0.125	U	0.120	0.121	96.3	97.2	1	10.0-148			0.914	37
2,2-Dichloropropane	0.125	U	0.128	0.134	103	107	1	10.0-138			4.04	36
Di-isopropyl ether	0.125	U	0.130	0.130	104	104	1	10.0-147			0.120	36
Ethylbenzene	0.125	U	0.118	0.121	94.7	97.1	1	10.0-160			2.51	38
Hexachloro-1,3-butadiene	0.125	U	0.0966	0.0951	77.3	76.1	1	10.0-160			1.64	40
Isopropylbenzene	0.125	U	0.106	0.109	84.8	86.9	1	10.0-155			2.36	38
p-Isopropyltoluene	0.125	U	0.117	0.124	93.2	98.8	1	10.0-160			5.82	40
2-Butanone (MEK)	0.625	0.0151	0.765	0.752	120	118	1	10.0-160			1.82	40
Methylene Chloride	0.125	U	0.109	0.107	87.6	85.4	1	10.0-141			2.54	37
4-Methyl-2-pentanone (MIBK)	0.625	U	0.641	0.650	103	104	1	10.0-160			1.46	35
Methyl tert-butyl ether	0.125	U	0.109	0.121	86.8	96.5	1	11.0-147			10.5	35
Naphthalene	0.125	U	0.0911	0.0964	72.9	77.1	1	10.0-160			5.62	36
n-Propylbenzene	0.125	U	0.129	0.137	103	109	1	10.0-158			5.47	38
Styrene	0.125	U	0.105	0.111	83.7	89.1	1	10.0-160			6.23	40
1,1,1,2-Tetrachloroethane	0.125	U	0.126	0.128	101	102	1	10.0-149			1.03	39

L1119030-03 Original Sample (OS) • Matrix Spike (MS) • Matrix Spike Duplicate (MSD)

(OS) L1119030-03 07/22/19 02:00 • (MS) R3432932-3 07/22/19 04:45 • (MSD) R3432932-4 07/22/19 05:06

Analyte	Spike Amount mg/kg	Original Result mg/kg	MS Result mg/kg	MSD Result mg/kg	MS Rec. %	MSD Rec. %	Dilution	Rec. Limits %	MS Qualifier	MSD Qualifier	RPD %	RPD Limits %
1,1,2,2-Tetrachloroethane	0.125	U	0.0972	0.0986	77.8	78.9	1	10.0-160			1.39	35
Toluene	0.125	U	0.115	0.120	92.1	95.7	1	10.0-156			3.82	38
1,1,2-Trichlorotrifluoroethane	0.125	U	0.146	0.150	117	120	1	10.0-160			2.66	36
1,2,3-Trichlorobenzene	0.125	U	0.0999	0.103	79.9	82.0	1	10.0-160			2.60	40
1,2,4-Trichlorobenzene	0.125	U	0.0855	0.0941	68.4	75.3	1	10.0-160			9.60	40
1,1,1-Trichloroethane	0.125	U	0.133	0.138	106	110	1	10.0-144			3.77	35
1,1,2-Trichloroethane	0.125	U	0.112	0.114	89.9	91.0	1	10.0-160			1.19	35
Trichloroethene	0.125	U	0.159	0.164	127	131	1	10.0-156			3.25	38
Trichlorofluoromethane	0.125	U	0.144	0.154	115	123	1	10.0-160			6.72	40
1,2,3-Trichloropropane	0.125	U	0.121	0.134	97.1	107	1	10.0-156			9.71	35
1,2,3-Trimethylbenzene	0.125	U	0.110	0.114	88.2	91.2	1	10.0-160			3.40	36
1,2,4-Trimethylbenzene	0.125	U	0.106	0.113	84.9	90.6	1	10.0-160			6.53	36
1,3,5-Trimethylbenzene	0.125	U	0.126	0.134	100	107	1	10.0-160			6.15	38
Vinyl chloride	0.125	U	0.116	0.125	93.0	100	1	10.0-160			7.49	37
Xylenes, Total	0.375	U	0.340	0.345	90.7	92.0	1	10.0-160			1.46	38
(S) Toluene-d8					*106*	*104*		*75.0-131*				
(S) 4-Bromofluorobenzene					*103*	*100*		*67.0-138*				
(S) 1,2-Dichloroethane-d4					*115*	*116*		*70.0-130*				

Method Blank (MB)

(MB) R3433140-2 07/22/19 23:00

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Acetone	U		0.0137	0.0250
Acrylonitrile	U		0.00190	0.0125
Benzene	U		0.000400	0.00100
Bromobenzene	U		0.00105	0.0125
Bromodichloromethane	U		0.000788	0.00250
Bromoform	U		0.00598	0.0250
Bromomethane	U		0.00370	0.0125
n-Butylbenzene	U		0.00384	0.0125
sec-Butylbenzene	U		0.00253	0.0125
tert-Butylbenzene	U		0.00155	0.00500
Carbon disulfide	U		0.00406	0.0125
Carbon tetrachloride	U		0.00108	0.00500
Chlorobenzene	U		0.000573	0.00250
Chlorodibromomethane	U		0.000450	0.00250
Chloroethane	U		0.00108	0.00500
Chloroform	U		0.000415	0.00250
Chloromethane	U		0.00139	0.0125
2-Chlorotoluene	U		0.000920	0.00250
4-Chlorotoluene	U		0.00113	0.00500
1,2-Dibromo-3-Chloropropane	U		0.00510	0.0250
1,2-Dibromoethane	U		0.000525	0.00250
Dibromomethane	U		0.00100	0.00500
1,2-Dichlorobenzene	U		0.00145	0.00500
1,3-Dichlorobenzene	U		0.00170	0.00500
1,4-Dichlorobenzene	U		0.00197	0.00500
Dichlorodifluoromethane	U		0.000818	0.00250
1,1-Dichloroethane	U		0.000575	0.00250
1,2-Dichloroethane	U		0.000475	0.00250
1,1-Dichloroethene	U		0.000500	0.00250
cis-1,2-Dichloroethene	U		0.000690	0.00250
trans-1,2-Dichloroethene	U		0.00143	0.00500
1,2-Dichloropropane	U		0.00127	0.00500
1,1-Dichloropropene	U		0.000700	0.00250
1,3-Dichloropropane	U		0.00175	0.00500
cis-1,3-Dichloropropene	U		0.000678	0.00250
trans-1,3-Dichloropropene	U		0.00153	0.00500
2,2-Dichloropropane	U		0.000793	0.00250
Di-isopropyl ether	U		0.000350	0.00100
Ethylbenzene	U		0.000530	0.00250
Hexachloro-1,3-butadiene	U		0.0127	0.0250

Method Blank (MB)

(MB) R3433140-2 07/22/19 23:00

Analyte	MB Result mg/kg	MB Qualifier	MB MDL mg/kg	MB RDL mg/kg
Isopropylbenzene	U		0.000863	0.00250
p-Isopropyltoluene	U		0.00233	0.00500
2-Butanone (MEK)	0.0195	J	0.0125	0.0250
Methylene Chloride	U		0.00664	0.0250
4-Methyl-2-pentanone (MIBK)	U		0.0100	0.0250
Methyl tert-butyl ether	U		0.000295	0.00100
Naphthalene	U		0.00312	0.0125
n-Propylbenzene	U		0.00118	0.00500
Styrene	U		0.00273	0.0125
1,1,1,2-Tetrachloroethane	U		0.000500	0.00250
1,1,2,2-Tetrachloroethane	U		0.000390	0.00250
Tetrachloroethene	U		0.000700	0.00250
Toluene	U		0.00125	0.00500
1,1,2-Trichlorotrifluoroethane	U		0.000675	0.00250
1,2,3-Trichlorobenzene	U		0.000625	0.00250
1,2,4-Trichlorobenzene	U		0.00482	0.0125
1,1,1-Trichloroethane	U		0.000275	0.00250
1,1,2-Trichloroethane	U		0.000883	0.00250
Trichloroethene	U		0.000400	0.00100
Trichlorofluoromethane	U		0.000500	0.00250
1,2,3-Trichloropropane	U		0.00510	0.0125
1,2,3-Trimethylbenzene	U		0.00115	0.00500
1,2,4-Trimethylbenzene	U		0.00116	0.00500
1,3,5-Trimethylbenzene	U		0.00108	0.00500
Vinyl chloride	U		0.000683	0.00250
Xylenes, Total	U		0.00478	0.00650
(S) Toluene-d8	*101*			*75.0-131*
(S) 4-Bromofluorobenzene	*90.6*			*67.0-138*
(S) 1,2-Dichloroethane-d4	*111*			*70.0-130*

Laboratory Control Sample (LCS)

(LCS) R3433140-1 07/22/19 22:03

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Acetone	0.625	0.865	138	10.0-160	
Acrylonitrile	0.625	0.781	125	45.0-153	
Benzene	0.125	0.120	95.9	70.0-123	
Bromobenzene	0.125	0.121	96.7	73.0-121	

Laboratory Control Sample (LCS)

(LCS) R3433140-1 07/22/19 22:03

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
Bromodichloromethane	0.125	0.102	82.0	73.0-121	
Bromoform	0.125	0.114	91.2	64.0-132	
Bromomethane	0.125	0.125	99.9	56.0-147	
n-Butylbenzene	0.125	0.121	96.5	68.0-135	
sec-Butylbenzene	0.125	0.115	92.1	74.0-130	
tert-Butylbenzene	0.125	0.0947	75.8	75.0-127	
Carbon disulfide	0.125	0.112	89.5	56.0-133	
Carbon tetrachloride	0.125	0.117	93.6	66.0-128	
Chlorobenzene	0.125	0.103	82.8	76.0-128	
Chlorodibromomethane	0.125	0.107	85.8	74.0-127	
Chloroethane	0.125	0.137	110	61.0-134	
Chloroform	0.125	0.116	92.4	72.0-123	
Chloromethane	0.125	0.157	126	51.0-138	
2-Chlorotoluene	0.125	0.0935	74.8	75.0-124	J4
4-Chlorotoluene	0.125	0.126	101	75.0-124	
1,2-Dibromo-3-Chloropropane	0.125	0.128	102	59.0-130	
1,2-Dibromoethane	0.125	0.105	84.0	74.0-128	
Dibromomethane	0.125	0.107	85.4	75.0-122	
1,2-Dichlorobenzene	0.125	0.112	90.0	76.0-124	
1,3-Dichlorobenzene	0.125	0.107	85.8	76.0-125	
1,4-Dichlorobenzene	0.125	0.111	88.9	77.0-121	
Dichlorodifluoromethane	0.125	0.132	106	43.0-156	
1,1-Dichloroethane	0.125	0.132	106	70.0-127	
1,2-Dichloroethane	0.125	0.144	115	65.0-131	
1,1-Dichloroethene	0.125	0.136	109	65.0-131	
cis-1,2-Dichloroethene	0.125	0.106	84.8	73.0-125	
trans-1,2-Dichloroethene	0.125	0.111	88.5	71.0-125	
1,2-Dichloropropane	0.125	0.109	87.0	74.0-125	
1,1-Dichloropropene	0.125	0.113	90.4	73.0-125	
1,3-Dichloropropane	0.125	0.113	90.1	80.0-125	
cis-1,3-Dichloropropene	0.125	0.114	91.0	76.0-127	
trans-1,3-Dichloropropene	0.125	0.117	93.7	73.0-127	
2,2-Dichloropropane	0.125	0.148	118	59.0-135	
Di-isopropyl ether	0.125	0.155	124	60.0-136	
Ethylbenzene	0.125	0.121	96.8	74.0-126	
Hexachloro-1,3-butadiene	0.125	0.123	98.1	57.0-150	
Isopropylbenzene	0.125	0.105	84.3	72.0-127	
p-Isopropyltoluene	0.125	0.107	85.3	72.0-133	
2-Butanone (MEK)	0.625	0.906	145	30.0-160	
Methylene Chloride	0.125	0.109	86.9	68.0-123	

Laboratory Control Sample (LCS)

(LCS) R3433140-1 07/22/19 22:03

Analyte	Spike Amount mg/kg	LCS Result mg/kg	LCS Rec. %	Rec. Limits %	LCS Qualifier
4-Methyl-2-pentanone (MIBK)	0.625	0.806	129	56.0-143	
Methyl tert-butyl ether	0.125	0.131	105	66.0-132	
Naphthalene	0.125	0.110	87.6	59.0-130	
n-Propylbenzene	0.125	0.112	89.7	74.0-126	
Styrene	0.125	0.0979	78.3	72.0-127	
1,1,1,2-Tetrachloroethane	0.125	0.0938	75.0	74.0-129	
1,1,2,2-Tetrachloroethane	0.125	0.139	111	68.0-128	
Tetrachloroethene	0.125	0.108	86.6	70.0-136	
Toluene	0.125	0.114	91.3	75.0-121	
1,1,2-Trichlorotrifluoroethane	0.125	0.121	96.9	61.0-139	
1,2,3-Trichlorobenzene	0.125	0.115	91.9	59.0-139	
1,2,4-Trichlorobenzene	0.125	0.111	88.5	62.0-137	
1,1,1-Trichloroethane	0.125	0.127	101	69.0-126	
1,1,2-Trichloroethane	0.125	0.0989	79.1	78.0-123	
Trichloroethene	0.125	0.111	88.9	76.0-126	
Trichlorofluoromethane	0.125	0.128	102	61.0-142	
1,2,3-Trichloropropane	0.125	0.113	90.7	67.0-129	
1,2,3-Trimethylbenzene	0.125	0.100	80.3	74.0-124	
1,2,4-Trimethylbenzene	0.125	0.0973	77.9	70.0-126	
1,3,5-Trimethylbenzene	0.125	0.105	83.8	73.0-127	
Vinyl chloride	0.125	0.126	101	63.0-134	
Xylenes, Total	0.375	0.297	79.2	72.0-127	
(S) Toluene-d8			*95.7*	*75.0-131*	
(S) 4-Bromofluorobenzene			*91.7*	*67.0-138*	
(S) 1,2-Dichloroethane-d4			*113*	*70.0-130*	

1 Cp
2 Tc
3 Ss
4 Cn
5 Ds
6 Sr
7 Qc
8 Gl
9 Al
10 Sc

Guide to Reading and Understanding Your Laboratory Report

The information below is designed to better explain the various terms used in your report of analytical results from the Laboratory. This is not intended as a comprehensive explanation, and if you have additional questions please contact your project representative.

Results Disclaimer - Information that may be provided by the customer, and contained within this report, include Permit Limits, Project Name, Sample ID, Sample Matrix, Sample Preservation, Field Blanks, Field Spikes, Field Duplicates, On-Site Data, Sampling Collection Dates/Times, and Sampling Location. Results relate to the accuracy of this information provided, and as the samples are received.

Abbreviations and Definitions

(dry)	Results are reported based on the dry weight of the sample. [this will only be present on a dry report basis for soils].
MDL	Method Detection Limit.
MDL (dry)	Method Detection Limit.
ND	Not detected at the Reporting Limit (or MDL where applicable).
RDL	Reported Detection Limit.
RDL (dry)	Reported Detection Limit.
Rec.	Recovery.
RPD	Relative Percent Difference.
SDG	Sample Delivery Group.
(S)	Surrogate (Surrogate Standard) - Analytes added to every blank, sample, Laboratory Control Sample/Duplicate and Matrix Spike/Duplicate; used to evaluate analytical efficiency by measuring recovery. Surrogates are not expected to be detected in all environmental media.
U	Not detected at the Reporting Limit (or MDL where applicable).
Analyte	The name of the particular compound or analysis performed. Some Analyses and Methods will have multiple analytes reported.
Dilution	If the sample matrix contains an interfering material, the sample preparation volume or weight values differ from the standard, or if concentrations of analytes in the sample are higher than the highest limit of concentration that the laboratory can accurately report, the sample may be diluted for analysis. If a value different than 1 is used in this field, the result reported has already been corrected for this factor.
Limits	These are the target % recovery ranges or % difference value that the laboratory has historically determined as normal for the method and analyte being reported. Successful QC Sample analysis will target all analytes recovered or duplicated within these ranges.
Original Sample	The non-spiked sample in the prep batch used to determine the Relative Percent Difference (RPD) from a quality control sample. The Original Sample may not be included within the reported SDG.
Qualifier	This column provides a letter and/or number designation that corresponds to additional information concerning the result reported. If a Qualifier is present, a definition per Qualifier is provided within the Glossary and Definitions page and potentially a discussion of possible implications of the Qualifier in the Case Narrative if applicable.
Result	The actual analytical final result (corrected for any sample specific characteristics) reported for your sample. If there was no measurable result returned for a specific analyte, the result in this column may state “ND” (Not Detected) or “BDL” (Below Detectable Levels). The information in the results column should always be accompanied by either an MDL (Method Detection Limit) or RDL (Reporting Detection Limit) that defines the lowest value that the laboratory could detect or report for this analyte.
Uncertainty (Radiochemistry)	Confidence level of 2 sigma.
Case Narrative (Cn)	A brief discussion about the included sample results, including a discussion of any non-conformances to protocol observed either at sample receipt by the laboratory from the field or during the analytical process. If present, there will be a section in the Case Narrative to discuss the meaning of any data qualifiers used in the report.
Quality Control Summary (Qc)	This section of the report includes the results of the laboratory quality control analyses required by procedure or analytical methods to assist in evaluating the validity of the results reported for your samples. These analyses are not being performed on your samples typically, but on laboratory generated material.
Sample Chain of Custody (Sc)	This is the document created in the field when your samples were initially collected. This is used to verify the time and date of collection, the person collecting the samples, and the analyses that the laboratory is requested to perform. This chain of custody also documents all persons (excluding commercial shippers) that have had control or possession of the samples from the time of collection until delivery to the laboratory for analysis.
Sample Results (Sr)	This section of your report will provide the results of all testing performed on your samples. These results are provided by sample ID and are separated by the analyses performed on each sample. The header line of each analysis section for each sample will provide the name and method number for the analysis reported.
Sample Summary (Ss)	This section of the Analytical Report defines the specific analyses performed for each sample ID, including the dates and times of preparation and/or analysis.

Qualifier	Description
J	The identification of the analyte is acceptable; the reported value is an estimate.
J4	The associated batch QC was outside the established quality control range for accuracy.

ACCREDITATIONS & LOCATIONS

Pace National is the only environmental laboratory accredited/certified to support your work nationwide from one location. One phone call, one point of contact, one laboratory. No other lab is as accessible or prepared to handle your needs throughout the country. Our capacity and capability from our single location laboratory is comparable to the collective totals of the network laboratories in our industry. The most significant benefit to our one location design is the design of our laboratory campus. The model is conducive to accelerated productivity, decreasing turn-around time, and preventing cross contamination, thus protecting sample integrity. Our focus on premium quality and prompt service allows us to be YOUR LAB OF CHOICE.
* Not all certifications held by the laboratory are applicable to the results reported in the attached report.
* Accreditation is only applicable to the test methods specified on each scope of accreditation held by Pace National.

State Accreditations

Alabama	40660	Nebraska	NE-OS-15-05
Alaska	17-026	Nevada	TN-03-2002-34
Arizona	AZ0612	New Hampshire	2975
Arkansas	88-0469	New Jersey–NELAP	TN002
California	2932	New Mexico [1]	n/a
Colorado	TN00003	New York	11742
Connecticut	PH-0197	North Carolina	Env375
Florida	E87487	North Carolina [1]	DW21704
Georgia	NELAP	North Carolina [3]	41
Georgia [1]	923	North Dakota	R-140
Idaho	TN00003	Ohio–VAP	CL0069
Illinois	200008	Oklahoma	9915
Indiana	C-TN-01	Oregon	TN200002
Iowa	364	Pennsylvania	68-02979
Kansas	E-10277	Rhode Island	LAO00356
Kentucky [1 6]	90010	South Carolina	84004
Kentucky [2]	16	South Dakota	n/a
Louisiana	AI30792	Tennessee [1 4]	2006
Louisiana [1]	LA180010	Texas	T104704245-18-15
Maine	TN0002	Texas [5]	LAB0152
Maryland	324	Utah	TN00003
Massachusetts	M-TN003	Vermont	VT2006
Michigan	9958	Virginia	460132
Minnesota	047-999-395	Washington	C847
Mississippi	TN00003	West Virginia	233
Missouri	340	Wisconsin	9980939910
Montana	CERT0086	Wyoming	A2LA

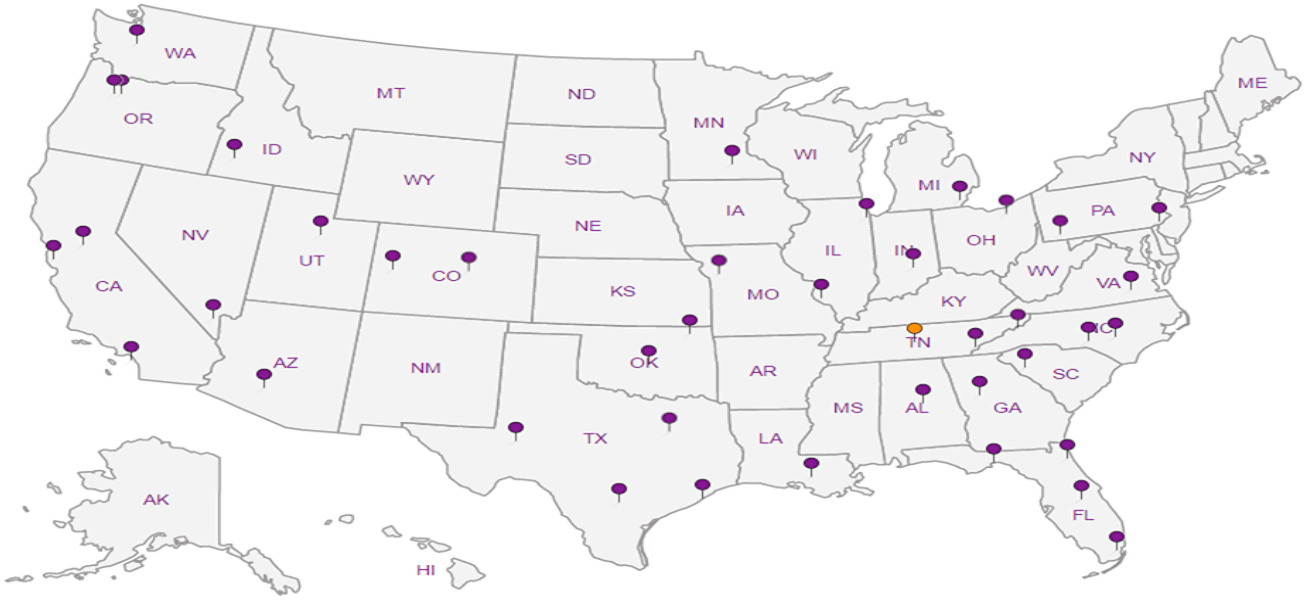
Third Party Federal Accreditations

A2LA – ISO 17025	1461.01	AIHA-LAP,LLC EMLAP	100789
A2LA – ISO 17025 [5]	1461.02	DOD	1461.01
Canada	1461.01	USDA	P330-15-00234
EPA–Crypto	TN00003		

[1] Drinking Water [2] Underground Storage Tanks [3] Aquatic Toxicity [4] Chemical/Microbiological [5] Mold [6] Wastewater n/a Accreditation not applicable

Our Locations

Pace National has sixty-four client support centers that provide sample pickup and/or the delivery of sampling supplies. If you would like assistance from one of our support offices, please contact our main office. Pace National performs all testing at our central laboratory.



AEI Consultants - Torrance, CA

2207 W. 190th Street
Torrance, CA 90504

Billing Information:
Accounts Payable
2207 W. 190th Street
Torrance, CA 90504

Report to: Kate Lamb

Email To: klamb@aeiconsultants.com

Project Description: SFAC

City/State Collected: Vernon, CA

Phone: 949-752-9300
Fax:

Client Project # 393142

Lab Project # AEICONICA-LAMB

Collected by (print): Dash Geyer

Site/Facility ID #

P.O. # 199246

Collected by (signature):

Immediately Packed on Ice N ____ Y ____

Rush? (Lab MUST Be Notified)
___ Same Day X Five Day
___ Next Day ___ 5 Day (Rad Only)
___ Two Day ___ 10 Day (Rad Only)
___ Three Day

Quote #

Date Results Needed

Pres Chk

Analysis / Container / Preservative

Chain of Custody Page 1 of 3

Pace Analytical®
National Center for Testing & Innovation

12065 Lebanon Rd
Mount Juliet, TN 37122
Phone: 615-758-5858
Phone: 800-767-5859
Fax: 615-758-5859

L # 1119007

F195

Acctnum: AEICONICA
Template: T152332
Prelogin: P716926
TSR: 110 - Brian Ford
PB: BF 7/3/19

Shipped Via: FedEX Saver

Sample ID	Comp/Grab	Matrix *	Depth	Date	Time	No. of Cntrs	TO-15SIM Summa (PCE only)	Remarks	Sample # (lab only)
1A-1B	–	Air	–	7/12/19	0830 ~~0820~~	1	X		01
1A-2B	–	Air	–		0835 ~~0825~~		X		02
1A-3B	–	Air	–		0840		X		03
1A-4B	–	Air	–		0845		X		04
1A-5B	–	Air	–		0953		X		05
1A-6B	–	Air	–		0951		X		06
1A-7B	–	Air	–		0952		X		07
1A-16B	–	Air	–		0950		X		08
1A-8B	–	Air	–		0949		X		09
1A-9B	–	Air	–		0945		X		10

* Matrix:
SS - Soil AIR - Air F - Filter
GW - Groundwater B - Bioassay
WW - WasteWater
DW - Drinking Water
OT - Other_____

Remarks:

pH _____ Temp _____
Flow _____ Other _____

Samples returned via:
__ UPS __ FedEx __ Courier __ _____

Tracking # fedex 4044 8309 1397

Sample Receipt Checklist
COC Seal Present/Intact: NP __Y __N
COC Signed/Accurate: __Y __N
Bottles arrive intact: __Y __N
Correct bottles used: __Y __N
Sufficient volume sent: __Y __N
If Applicable
VOA Zero Headspace: __Y __N
Preservation Correct/Checked: __Y __N

Relinquished by : (Signature)	Date: 7/12/19	Time: 7/13/19 1301	Received by: (Signature)	Trip Blank Received: Yes / No HCL / MeoH TBR
Relinquished by : (Signature)	Date: 7/15/19	Time: 1750	Received by: (Signature)	Temp: Amb °C Bottles Received: 24
Relinquished by : (Signature)	Date:	Time:	Received for lab by: (Signature)	Date: 7/16/19 Time: 8:45

If preservation required by Login: Date/Time

Hold:

Condition: NCF / OK

AEI Consultants - Torrance, CA

2207 W. 190th Street
Torrance, CA 90504

Billing Information:
Accounts Payable
2207 W. 190th Street
Torrance, CA 90504

Pres Chk

Analysis / Container / Preservative

Chain of Custody Page 2 of 3

Pace Analytical®
National Center for Testing & Innovation

12065 Lebanon Rd
Mount Juliet, TN 37122
Phone: 615-758-5858
Phone: 800-767-5859
Fax: 615-758-5859

Report to: Kate Lamb

Email To: klamb@aeiconsultants.com

Project Description: SFAC

City/State Collected: Vernon CA

Phone: 949-752-9300
Fax:

Client Project # 393142

Lab Project # AEICONICA-LAMB

L # 1119007

Table #

Collected by (print): Dash Geyer

Site/Facility ID #

P.O. # 199246

Acctnum: AEICONICA
Template: T152332
Prelogin: P716926
TSR: 110 - Brian Ford
PB: BF 7/3/19

Collected by (signature):

Immediately Packed on Ice N ___ Y ___

Rush? (Lab MUST Be Notified)
___ Same Day X Five Day
___ Next Day ___ 5 Day (Rad Only)
___ Two Day ___ 10 Day (Rad Only)
___ Three Day

Quote #

Date Results Needed

Shipped Via: FedEX Saver

Sample ID	Comp/Grab	Matrix *	Depth	Date	Time	No. of Cntrs	TO-15SIM Summa (PCE only)									Remarks	Sample # (lab only)
1A-10B	–	Air	–	7/12/19	0947	1	X										11
1A-11B	–	Air	–		0942		X										12
1A-12B	–	Air	–		0940		X										13
1A-13B	–	Air	–		0935		X										14
1A-14B	–	Air	–		0938		X										15
1A-15B	–	Air	–		0933		X										16
1A-17B	–	Air	–		1010		X										17
1A-18B	–	Air	–		1005		X										18
1A-19B	–	Air	–		0955		X										19
1A-20B	–	Air	–		1000		X										20

* Matrix:
SS - Soil AIR - Air F - Filter
GW - Groundwater B - Bioassay
WW - WasteWater
DW - Drinking Water
OT - Other_____

Remarks:

pH _____ Temp _____
Flow _____ Other _____

Samples returned via:
__ UPS __ FedEx __ Courier __ _____

Tracking #

Sample Receipt Checklist
COC Seal Present/Intact: __NP __Y __N
COC Signed/Accurate: __Y __N
Bottles arrive intact: __Y __N
Correct bottles used: __Y __N
Sufficient volume sent: __Y __N
If Applicable
VOA Zero Headspace: __Y __N
Preservation Correct/Checked: __Y __N

Relinquished by : (Signature)	Date:	Time:	Received by: (Signature)	Trip Blank Received: Yes / No HCL / MeoH TBR	If preservation required by Login: Date/Time
	7/12/19	7/15/19 1401		0	
Relinquished by : (Signature)	Date:	Time:	Received by: (Signature)	Temp: °C Bottles Received: Amb 24	
	7/15/19	1750			
Relinquished by : (Signature)	Date:	Time:	Received for lab by: (Signature)	Date: Time: 7/16/19 8:45	Hold: / Condition: NCF / OK

AEI Consultants - Torrance, CA

2207 W. 190th Street
Torrance, CA 90504

Billing Information:
Accounts Payable
2207 W. 190th Street
Torrance, CA 90504

Pres Chk

Report to: Kate Lamb

Email To: klamb@aeiconsultants.com

Project Description: SFAC

City/State Collected: Vernon, CA

Phone: 949-752-9300
Fax:

Client Project # 393142

Lab Project # AEICONICA-LAMB

Collected by (print): Dash Geyer

Site/Facility ID #

P.O. # 199246

Collected by (signature):

Immediately Packed on Ice N ____ Y ____

Rush? (Lab MUST Be Notified)
___ Same Day X Five Day
___ Next Day ___ 5 Day (Rad Only)
___ Two Day ___ 10 Day (Rad Only)
___ Three Day

Date Results Needed

Quote #

Analysis / Container / Preservative

Chain of Custody Page 3 of 3

Pace Analytical®
National Center for Testing & Innovation

12065 Lebanon Rd
Mount Juliet, TN 37122
Phone: 615-758-5858
Phone: 800-767-5859
Fax: 615-758-5859

L# 119607

Table #

Acctnum: AEICONICA
Template: T152332
Prelogin: P716926
TSR: 110 - Brian Ford
PB: BF 7/3/19

Shipped Via: FedEX Saver

Sample ID	Comp/Grab	Matrix *	Depth	Date	Time	No. of Cntrs	TO-15SIM Summa (PCE only)	Total VOCs 8260B	TCLP 8260B	Remarks	Sample # (lab only)
AA-1B	–	Air	–	7/12/19	0820	1	X				21
AA-2B	–	Air	–	↓	0825	↓	X				22
Intermediate	Grab	OT	–	7/12/19	1035			X	X		23
Effluent	Grab	OT	–	↓	1015			X	X		24

* Matrix:
SS - Soil AIR - Air F - Filter
GW - Groundwater B - Bioassay
WW - WasteWater
DW - Drinking Water
OT - Other_____

Remarks:

pH _____ Temp _____
Flow _____ Other _____

Samples returned via:
__ UPS __ FedEx __ Courier __ _____

Tracking #

Sample Receipt Checklist
COC Seal Present/Intact: __NP __Y __N
COC Signed/Accurate: __Y __N
Bottles arrive intact: __Y __N
Correct bottles used: __Y __N
Sufficient volume sent: __Y __N
If Applicable
VOA Zero Headspace: __Y __N
Preservation Correct/Checked: __Y __N

Relinquished by: (Signature)	Date:	Time:	Received by: (Signature)	Trip Blank Received: Yes / No HCL / MeoH TBR
	7/12/19	7/15/19 1401		0
Relinquished by : (Signature)	Date:	Time:	Received by: (Signature)	Temp: °C Bottles Received:
	7/15/19	1750		Amb 24
Relinquished by : (Signature)	Date:	Time:	Received for lab by: (Signature)	Date: Time:
				7/16/19 8:45

If preservation required by Login: Date/Time

Hold:

Condition: NCF / OK