# APPENDIX D

# PHASE I ENVIRONMENTAL SITE ASSESSMENT

# AEI Consultants

June 9, 2021

## PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Property Information:**
2942 College Avenue
Berkeley, Alameda County, California 94705

**Project Information:**
AEI Project No. 430782

**Prepared For:**
Rue-Ell Enterprises, Inc.
2437 Durant Ave, Suite 204
Berkeley, California 94704

**Prepared By:**
AEI Consultants
2500 Camino Diablo, Suite 100
Walnut Creek, CA 94597-3940

Environmental Due Diligence

Building Assessments

Site Investigation & Remediation

Energy Performance & Benchmarking

Industrial Hygiene

Construction Risk Management

Zoning Analysis Reports & ALTA Surveys

AEI Consultants

June 9, 2021

Jeffrey Anhalt
Rue-Ell Enterprises, Inc.
2437 Durant Ave, Suite 204
Berkeley, California 94704

**Subject:** **Phase I Environmental Site Assessment**
2942 College Avenue
Berkeley, California 94705
AEI Project No. 430782

Dear Jeffrey Anhalt:

AEI Consultants is pleased to provide the *Phase I Environmental Site Assessment* of the above referenced property. This assessment was authorized and performed in accordance with the scope of services engaged.

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 (925) 285-8286 or pmcintyre@aeiconsultants.com.

Sincerely,

Peter McIntyre, PG
Executive Vice President
AEI Consultants

# PROJECT SUMMARY

**2942 College Avenue, Berkeley, Alameda County, California 94705**
**AEI Project No. 430782**

| Report Section | | REC | CREC | HREC | OEC | Recommended Action |
|---|---|---|---|---|---|---|
| 1.0 | Introduction | | | | | None |
| 2.0 | Site and Vicinity Description | | | | | None |
| 3.0 | Historical Review of Site and Vicinity | ✔ | | | | Continue to work with lead agency regarding case closure and planned redevelopment |
| 4.0 | Regulatory Agency Records Review | ✔ | | | ✔ | See 3.0 |
| 5.0 | Regulatory Database Records Review | ✔ | | | | See 3.0 |
| 6.0 | Interviews and User Provided Information | ✔ | | | | See 3.0 |
| 7.0 | Site Reconnaissance | ✔ | | | | See 3.0 |
| 8.1 | Asbestos-Containing Building Materials | | | | ✔ | Pre-demolition building materials survey as required |
| 8.2 | Lead-Based Paint | | | | ✔ | See 8.1 |
| 8.3 | Radon | | | | | None |
| 8.4 | Mold | | | | | None |

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# EXECUTIVE SUMMARY

AEI Consultants (AEI) was retained by Rue-Ell Enterprises, Inc. to conduct a Phase I ESA in conformance with AEI's 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 2942 College Avenue, Berkeley, Alameda County, California (the "subject property"). Any exceptions to, or deletions from, this practice are described in Sections 1.4, 1.5, and 1.6 of this report.

Pertinent subject property information is noted below:

| **PROPERTY INFORMATION** | |
|---|---|
| **Site Address(es)** | 2942 College Avenue, Berkeley, Alameda County, California 94705 |
| **Property ID (APN or Block/Lot)** | 52-1568-9 |
| **Location** | West of College Avenue and north of Ashby Avenue |
| **Property Type** | Retail - Free Standing |
| **SITE AND BUILDING INFORMATION** | |
| **Approximate Site Acreage/Source** | 0.147/Assessor |
| **Number of Buildings** | One |
| **Building Construction Date(s)/Source** | 1900/Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises |
| **Building Square Footage (SF)/Source** | 2,317/Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises |
| **Number of Floors/Stories** | One + mezzanine |
| **Basement or Subgrade Area(s)** | None identified; however the garage area is situated slightly sub-grade |
| **Number of Units** | One |
| **Additional Improvements** | A small masonry structure (former boiler room) and wooden shed (former restroom/outhouse) on rear lot, as well as associated landscaping |
| **On-site Occupant(s)** | Vacant |
| **Current On-site Operations/Use** | None; vacant |
| **Current Use of Hazardous Substances** | None identified |
| **REGULATORY INFORMATION** | |
| **Regulatory Database Listing(s)** | CPS-SLIC (x2), LUST (x2), RGA LUST, SWEEPS UST, CA FID UST, DRYCLEANERS, EDR HIST CLEANERS (x2), HWTS (x2), CERS (x2), FINDS (x2), CORTESE, HIST CORTESE, HAZNET, EMI |

A chronological summary of historical subject property information is as follows:

| Date Range | Subject Property Description and Occupancy (Historical Addresses) | Source(s) |
|---|---|---|
| Prior to 1900 | Unknown use/Data failure; refer to Section 1.6.1 | n/a |
| 1900 | Current building constructed | Interviews |

| Date Range | Subject Property Description and Occupancy (Historical Addresses) | Source(s) |
|---|---|---|
| 1911 | Developed with existing structure and a former structure on western portion of property, the eastern structure of which is occupied by a "Japanese Clothes Cleaning" business (2920-2924 College Avenue) | Sanborn map |
| 1920-1994 | Current and former structures occupied by a dry cleaning facility, College Cleaning and Dye Works dba College Cleaners (2929, 2929 1/2, 2942 College Avenue)<br><br>Rear/western structure, along with two others, are demolished in 1994 | Agency records, City directories, Sanborn maps |
| 1996-2018 | Current structure occupied by a dry cleaning facility, C&C Cleaners (2942 College Avenue) | Aerial photographs, regulatory database, agency records, city directories |
| 2019-Present | Current structure is vacant (2942 College Avenue) | Aerial photographs, city directories, site observation |

The immediately surrounding properties consist of the following:

| Direction | Tenant/Use (Address) | Regulatory Database Listing(s) |
|---|---|---|
| **North** | Multi-unit commercial & retail (2936-2940 College Avenue) consisting of the following tenants:<br><br>• Your Basic Bird Shop (2936 College Avenue)<br>• La Mediterranee Restaurant (2940 College Avenue)<br><br>City Parking Lot (no address, APN 52-1568-8-1) | None identified |
| **East** | College Avenue followed by:<br><br>Multi-unit commercial & retail (2941-2945 College Avenue) consisting of the following tenants:<br><br>• La Tour Salon (2941 College Avenue)<br>• Bill's Trading Post and Gem Gallery (2943 College Avenue)<br><br>Multi-unit commercial & retail (2947-2953 College Avenue) consisting of the following tenants:<br><br>• Elwood Stationary (2947 College Avenue)<br>• Therapy Stores, beauty supply (2951 College Avenue)<br>• Vintage Berkeley Wine (2953 College Avenue) | None identified |

| Direction | Tenant/Use (Address) | Regulatory Database Listing(s) |
|---|---|---|
| **South** | Multi- unit commercial, retail, & residential (2944-2956 College Avenue, 2637 Ashby Avenue) consisting of the following commercial tenants:<br>• Dream Fluff Donuts (2637 Ashby Avenue)<br>• Summer Kitchen, restaurant (2944 College Avenue)<br>• Urban Remedy, cafe (2946 College Avenue)<br>• Humphry Slocombe Ice Cream (2948 College Avenue)<br>• Swift Wool, clothes store (2952 College Avenue)<br>• Palm & Perkins, clothes store (2954 College Avenue)<br>• Bluemercury, beauty supply (2956 College Avenue)<br><br>Multi-unit commercial & retail (2629-2635 Ashby Avenue) consisting of the following tenants:<br>• Casa de Cholocates, Labels Luxury Consignment (2629 Ashby Avenue)<br>• The Dailey Method, fitness center (2631 Ashby Avenue)<br>• Donato & Co., restaurant (2635 Ashby Avenue) | EDR HIST AUTO (2944 College Avenue)<br><br>RCRA-VSQG (2950 College Avenue)<br><br>RCRA-NONGEN/NLR (2952 College Avenue)<br><br>HWTS, CERS HAZ WASTE, HAZNET (2956 College Avenue)<br><br>LUST, CORTESE, RCRA-LQG, HIST CORTESE (2929 Ashby Avenue)<br><br>EDR HIST CLEANER (2635, 2639 Ashby Avenue) |
| **West** | Multi-Family Residential (2929 Benvenue) Avenue) | None identified |

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

**FINDINGS**

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.

- The subject property is reported to have been operated by various dry cleaning facilities from 1910 through 2018. The subject property was formerly occupied by College Cleaners and subsequently by C&C Cleaners. Dry cleaning operations appear to have

been conducted within the current building and within a historical commercial building previously located on the western portion of the subject property.

Three USTs were removed from the subject property in 1993, including one heating-oil UST (70-gallon) and two Stoddard solvent USTs (250-gallon and 1,000-gallon). In addition, one Stoddard solvent UST (470-gallon) was reportedly discovered in December 1994 and removed in 1995. The USTs removed from the subject property were reported to have stored Stoddard solvent, petroleum naphtha, during the period College Cleaners and predecessor dry cleaners operating prior to 1995. The former dry cleaners were noted to have used and stored tetrachlorothene (PCE).

Soil investigations were performed between 1992 and 1995 and included collection of approximately 53 soil samples from soil borings and test pits. In June 1997, soil excavation was performed to remove petroleum hydrocarbon-impacted soil from the area of the former 470-gallon Stoddard solvent UST. Confirmation soil sampling indicated that the extent of impacted soil appeared to be restricted to a limited area that is inaccessible for additional excavation due to its proximity to the building wall and underlying foundation. Groundwater investigations were first initiated in 1993 and 1994. Soil gas investigations were first conducted at the subject property in response to observed PCE in groundwater monitoring well MW-5 in November 2000. Prior site investigations concluded that there were separate sources for the petroleum hydrocarbons and PCE, with recent sampling indicating that the PCE did not appear to be related to historical operations of former on-site USTs. Based on this notion, prior consultants recommended case closure of the Stoddard solvent release from the former on-site USTs 2002. The Stoddard solvent case (LUST) was granted closure by the Berkeley Toxics Management Division (TMD) in a letter dated December 30, 2004, with the condition that any redevelopment of the subject property will require TMD approval. In the closure letter, the TMD indicated that subject property owner continue corrective measures assessment and monitoring for the PCE investigation. No other work appears to have been performed at the subject property from 2005 to 2020.

At the request of the property owner, AEI was retained in 2020 and 2021 to perform additional site investigation activities. The investigations were conducted proactively by the owner in an effort to proactively collect recent site data, as part of the case transfer/ oversight process. The open PCE release case (Cleanup Site / SLIC) was transferred from Berkeley TMD to the San Francisco Bay Regional Water Quality Control Board (SFBRWQCB) in 2013 for regulatory oversight. A brief summary of AEI's site investigation work is as follows:

- November 2020 - visited property to attempt to sample monitoring wells. Only the upgradient well had groundwater present.
- December 2020 - attempted to collect grab groundwater samples, however groundwater was not encountered in the soil borings (maximum explored depth was 35 ft bgs). Soil samples were collected and TPHg was found by a former UST (the only area of impacted soil with COCs that exceeded ESLs). Elevated soil gas readings above current ESLs were presented at the rear of the building

- April 2021 - returned to the site to collect groundwater samples. Concentrations were significantly lower than those collected 20 years earlier.

In verbal discussions with the RWQCB, it was noted that additional investigations will likely be required. AEI expects to submit the 2020/2021 investigation results to the RWQCB for formal review/comment as part of a workplan for further investigation. Based on the concentrations of COCs in recent soil vapor sampling, it is possible that vapor mitigation may be required with respect to site redevelopment and that additional investigation may follow once the current structure has been removed.

The open Cleanup Site case constitutes a REC for the subject property. Additional discussion is presented in Sections 4.1 and 4.6.

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.

- The subject property was granted case closure for a former Stoddard Solvent release case in 2004. As previously discussed in the REC bullet above, the closed LUST case is representative of a CREC. Additional discussion is presented in Sections 4.1 and 4.6.

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.

- AEI did not identify evidence of HRECs during the course of this assessment.

Other Environmental Considerations (OEC) warrant discussion, but do not qualify as RECs as defined by the ASTM Standard Practice E1527-13. These include, but are not limited to, de minimis conditions and/or environmental considerations such as the presence of ACMs, LBP, radon, mold, and lead in drinking water, which can 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. A de minimis condition is defined by the ASTM Standard as a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

- According to information provided by the client, demolition of the subject property buildings is planned for the near future. Regardless of building construction date, the EPA's NESHAP requires that a thorough asbestos survey be performed prior to demolition or renovation activities that may disturb ACMs. This requirement may be enforced by federal, state and local regulatory agencies, and specifies that all suspect ACMs be

sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities which may disturb them to prevent potential exposure to workers, building occupants, and the environment.

- Due to the age of the subject property buildings, there is a potential that LBP is present. AEI understands that renovation and/or demolition activities of the subject property buildings are planned. AEI presumes that the planned renovation and/or demolition activities will be performed in accordance with applicable regulations. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.
- The subject property is located with the Berkeley Toxics Management Division (BTMD) Environmental Management Area (EMA). The EMA is an area within the City of Berkeley where known and/or suspected groundwater contamination is present. When construction projects are proposed, the BTMD reviews project descriptions to determine if any special requirements would be applicable. Such requirements can apply to certain excavation or dewatering activities.

## CONCLUSIONS, OPINIONS, AND RECOMMENDATIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) of 2942 College Avenue, Berkeley, Alameda County, California, the *subject property*. Any exceptions to, or deletions from, this practice are described in Sections 1.4, 1.5, and 1.6 of this report.

AEI did not identify evidence of RECs or CRECs in connection with the property except for those previously identified in the Findings section. AEI recommends the following:

- Continue to work with lead agency regarding case closure and planned redevelopment
- Perform required building material survey for asbestos and regulated materials prior to demolition

# 1.0 INTRODUCTION

This report documents the methods and findings of the Phase I Environmental Site Assessment performed in conformance with AEI's 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 2942 College Avenue, Berkeley, Alameda 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.

## 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 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 Environmental Site Assessment 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, current subject property use, 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 assessment was limited by the following:

- While additional assessments may have been conducted on the subject property, these documents must be provided for AEI's review in order for the information to be summarized/included in this report. Please refer to Section 6.3 for a summary of previous reports and other documentation provided to AEI during this assessment.
- 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.
- AEI contacted the RWQCB for information on the subject property in order to identify historical tenants, property use, and/or hazardous substance/petroleum product handling. Due to the time frame of this assessment, records at the RWQCB were not available for review. However, based on the quality of information obtained from other sources including GeoTracker and Berkeley TMD, this limitation is not expected to significantly alter the findings of this assessment.

## 1.6 Data Failure and Data Gaps

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

The following data failure was identified during the course of this assessment:

| | |
|---|---|
| **Data Failure** | The earliest historical resource obtained during this assessment was an interview with the property owner indicating that the current building was constructed in 1910. The lack of historical sources for the subject property dating back to first developed use represents historical data source failure. However, as it is assumed that the subject property would have been previously undeveloped, this data failure is not expected to significantly alter the findings of this assessment. |
| **Information/Sources Consulted** | City directories, Sanborn fire insurance maps, aerial photographs, agency records, interviews |

### 1.6.2 SIGNIFICANT 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 Rue-Ell Enterprises, Inc. 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 contract and Terms and Conditions executed by Rue-Ell Enterprises, Inc. on May 18, 2021. 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 | |
|---|---|
| **Site Address(es)** | 2942 College Avenue, Berkeley, Alameda County, California 94705 |
| **Property ID (APN or Block/Lot)** | 52-1568-9 |
| **Location** | West of College Avenue and north of Ashby Avenue |
| **Property Type** | Retail - Free Standing |
| **SITE AND BUILDING INFORMATION** | |
| **Approximate Site Acreage/Source** | 0.147/Assessor |
| **Number of Buildings** | One |
| **Building Construction Date(s)/Source** | 1900/Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises |
| **Building Square Footage (SF)/Source** | 2,317/Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises |
| **Number of Floors/Stories** | One + mezzanine |
| **Basement or Subgrade Area(s)** | None identified; however the garage area is situated slightly sub-grade |
| **Number of Units** | One |
| **Additional Improvements** | A small masonry structure (former boiler room) and wooden shed (former restroom/outhouse) on rear lot, as well as associated landscaping |
| **On-site Occupant(s)** | Vacant |
| **Current On-site Operations/Use** | None; vacant |
| **Current Use of Hazardous Substances** | None identified |
| **REGULATORY INFORMATION** | |
| **Regulatory Database Listing(s)** | CPS-SLIC (x2), LUST (x2), RGA LUST, SWEEPS UST, CA FID UST, DRYCLEANERS, EDR HIST CLEANERS (x2), HWTS (x2), CERS (x2), FINDS (x2), CORTESE, HIST CORTESE, HAZNET, EMI |

## 2.2 ON-SITE UTILITIES

| Utility | Source/System Information |
|---|---|
| **Heating System** | Natural gas |
| **Cooling System** | Electricity |
| **Potable Water** | East Bay Municipal Utility District (EBMUD) |
| **Sewage Disposal/Treatment** | City of Berkeley/Sanitary Sewer |

Utility source/system information listed in the table above is provided by Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises, unless otherwise noted above.

## 2.3 SITE AND VICINITY CHARACTERISTICS

The subject property is located in a mixed commercial, retail, and residential area of Berkeley, California. The immediately surrounding properties consist of the following:

| Direction | Tenant/Use (Address) | Regulatory Database Listing(s) |
|---|---|---|
| **North** | Multi-unit commercial & retail (2936-2940 College Avenue) consisting of the following tenants:<br>• Your Basic Bird Shop (2936 College Avenue)<br>• La Mediterranee Restaurant (2940 College Avenue)<br><br>City Parking Lot (no address, APN 52-1568-8-1) | None identified |
| **East** | College Avenue followed by:<br><br>Multi-unit commercial & retail (2941-2945 College Avenue) consisting of the following tenants:<br>• La Tour Salon (2941 College Avenue)<br>• Bill's Trading Post and Gem Gallery (2943 College Avenue)<br><br>Multi-unit commercial & retail (2947-2953 College Avenue) consisting of the following tenants:<br>• Elwood Stationary (2947 College Avenue)<br>• Therapy Stores, beauty supply (2951 College Avenue)<br>• Vintage Berkeley Wine (2953 College Avenue) | None identified |
| **South** | Multi- unit commercial, retail, & residential (2944-2956 College Avenue, 2637 Ashby Avenue) consisting of the following commercial tenants:<br>• Dream Fluff Donuts (2637 Ashby Avenue)<br>• Summer Kitchen, restaurant (2944 College Avenue)<br>• Urban Remedy, cafe (2946 College Avenue)<br>• Humphry Slocombe Ice Cream (2948 College Avenue)<br>• Swift Wool, clothes store (2952 College Avenue) | EDR HIST AUTO (2944 College Avenue)<br><br>RCRA-VSQG (2950 College Avenue)<br><br>RCRA-NONGEN/NLR (2952 College Avenue)<br><br>HWTS, CERS HAZ WASTE, HAZNET (2956 College Avenue)<br><br>LUST, CORTESE, RCRA-LQG, HIST CORTESE (2929 Ashby Avenue)<br><br>EDR HIST CLEANER (2635, 2639 Ashby Avenue) |

| Direction | Tenant/Use (Address) | Regulatory Database Listing(s) |
|---|---|---|
| | • Palm & Perkins, clothes store (2954 College Avenue)<br>• Bluemercury, beauty supply (2956 College Avenue)<br><br>Multi-unit commercial & retail (2629-2635 Ashby Avenue) consisting of the following tenants:<br>• Casa de Cholocates, Labels Luxury Consignment (2629 Ashby Avenue)<br>• The Dailey Method, fitness center (2631 Ashby Avenue)<br>• Donato & Co., restaurant (2635 Ashby Avenue) | |
| **West** | Multi-Family Residential (2929 Benvenue) Avenue) | None identified |

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

## 2.4 PHYSICAL SETTING

| | |
|---|---|
| **Geologic Unit: Description/Source** | Qtc (Temescal Formation): Chiefly characterized as interfingering lenses of clayey gravel, sandy silty clay, and sand-clay-silt mixtures, dissected, deposited in an alluvial environment, age Pleistocene/USGS and United States Department of the Interior |
| **Soil Series: Description/Source** | Urban Land-Tierra Complex (2 to 5 percent slopes: this designation indicates that more than 85 percent of the original soils have been disturbed or covered by paved surfaces, buildings or other structures/USDA Soil Survey<br><br>Soils encountered during prior on-site subsurface investigations have chiefly consisted of interbedded and intermixed sand, silt, and clay |
| **Groundwater Flow Direction/Source** | West-southwest/Topographic map interpretation and groundwater monitoring for the subject property since 1994 |
| **Depth to Groundwater/ Source** | 6 to 24 feet below ground surface (bgs)/Groundwater monitoring for the subject property since 1994 |
| **Surface waters on the subject property or adjoining sites** | None |
| **Additional notes** | None |

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.

# 3.0 HISTORICAL REVIEW OF SITE AND VICINITY

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 and Occupancy (Historical Addresses) | Source(s) |
|---|---|---|
| Prior to 1900 | Unknown use/Data failure; refer to Section 1.6.1 | n/a |
| 1900 | Current building constructed | Interviews |
| 1911 | Developed with existing structure and a former structure on western portion of property, the eastern structure of which is occupied by a "Japanese Clothes Cleaning" business (2920-2924 College Avenue) | Sanborn map |
| 1920-1994 | Current and former structures occupied by a dry cleaning facility, College Cleaning and Dye Works dba College Cleaners (2929, 2929 1/2, 2942 College Avenue)<br><br>Rear/western structure, along with two others, are demolished in 1994 | Agency records, City directories, Sanborn maps |
| 1996-2018 | Current structure occupied by a dry cleaning facility, C&C Cleaners (2942 College Avenue) | Aerial photographs, regulatory database, agency records, city directories |
| 2019-Present | Current structure is vacant (2942 College Avenue) | Aerial photographs, city directories, site observation |

The subject property was identified to be developed with the existing structure (2942 College Avenue) in 1900 and occupied by dry cleaning facilities as early as 1910. A former structure (2929 College Avenue) existed on the western portion of the subject property from at least 1911 to 1994 and was depicted as occupied by a dry cleaner in the 1950 and 1980 Sanborn maps.

Historical addresses include 2920-2924, 2929 and 2929 1/2 College Avenue were identified and included as part of the assessment. The addresses were researched during this assessment, where appropriate.

Environmental concerns identified for the subject property historical dry cleaner usage are discussed in Sections 4.1, 4.2 and 4.6.

If available, copies of historical sources are provided in Appendix D.

## 3.1 AERIAL PHOTOGRAPHS

AEI reviewed aerial photographs of the subject property and surrounding area. A search was made of the EDR collection of aerial photographs. Aerial photographs were reviewed for the following years:

| Year(s) | Subject Property Description | Adjoining Site Descriptions |
|---|---|---|
| 1939, 1940, 1946, 1950, 1958, 1963, 1968, 1974, 1982 | Developed with existing structure on eastern portion of lot, a former structure is also visible on western portion | NORTH: Developed with existing structure and former structure(s)<br>EAST: Developed with existing road and structures<br>SOUTH: Developed with existing structures<br>WEST: Developed with former structures |
| 1993 | No significant changes visible | NORTH: Developed with existing structure and parking lot<br>EAST: No significant changes visible<br>SOUTH: No significant changes visible<br>WEST: Developed with existing structures |
| 1998 2005 2009 2012 2016 | Developed with existing structure on eastern portion of lot, former structure on western portion no longer visible | NORTH: No significant changes visible<br>EAST: No significant changes visible<br>SOUTH: No significant changes visible<br>WEST: No significant changes visible |

Due to poor image quality and/or scale, detailed observation of site features was not possible in various images.

The tenancy of the subject property is discussed in Section 4.6.

The southern adjacent site is discussed in Section 5.1.

## 3.2 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) | Adjoining Site Descriptions |
|---|---|---|
| 1911 | Depicted as developed with two structures, the existing structure and a former structure on the western portion of the lot. The existing structure is depicted as occupied by a "Japanenese Clothes Cleaning" facility and an unspecified storefront, while the former | NORTH: Depicted with unimproved land<br>EAST: Depicted with College Avenue, followed by unimproved land<br>SOUTH: Former structures are depicted as occupied by unspecified storefronts, wood and coal storage is depicted to the rear<br>WEST: Former residences and unimproved land are depicted |

| Year(s) | Subject Property Description (Listed Address) | Adjoining Site Descriptions |
|---|---|---|
| | structure is depicted as used for clothes cleaning, an electric motor, and occupied by "Jap Seep'g Rooms."<br><br>Existing structure is addressed 2920-2924 College Avenue, while former structure is addressed 2920 College Avenue | |
| 1950 | Depicted as developed with two structures, the existing structure and a former structure on the western portion of the lot. The existing structure is depicted as occupied by a clothes pressing facility, while the former structure is depicted as used for dry cleaning. A small shed is visible with illegible labeling.<br><br>Existing structure is addressed 2942 College Avenue (and possibly 2942 1/2), while former structure is addressed 2929 1/2 College Avenue<br><br>What appears to be a small structure is depicted immediately northwest of the existing structure; the use is illegible | NORTH: Existing structure is depicted as occupied by several unnamed storefronts, a small parking structure followed by residences are also depicted<br>EAST: Depicted with College Avenue, followed by existing structures occupied by several unnamed storefronts<br>SOUTH: Existing structures are depicted as occupied by a parking garage with some auto repair, a donut maker, and several unnamed storefronts<br>WEST: Depicted as occupied by residences |
| 1980 | No significant changes depicted | NORTH: Existing structure is depicted as occupied by a picture framing business and an unnamed storefronts, existing parking lot is depicted<br>EAST: No significant changes depicted<br>SOUTH: No significant changes depicted<br>WEST: No significant changes depicted |

Based on review of the Sanborn maps, the subject property was identified to be occupied by a dry cleaning facility since 1911; refer to Section 4.6 for further discussion.

The southern adjacent site is discussed in Section 5.1.

### 3.3 City Directories

A search of historical city directories was conducted for the subject property utilizing EDR. Please refer to the appendices for a complete list of historical subject property tenants identified by EDR. Directories were reviewed in approximate five-year increments from 1920 to 2017. The first listing for the subject property appeared in 1920. The following table summarizes the results of the city directory search.

| Year(s) | Address - Occupant Listed |
|---|---|
| 1920 | 2924 College Street - College Cleaning & Dying Works, Jap Day Work Co |
| 1925 | 2942 College Avenue - College Cleaning & Dying Works<br>2924 College Ter - Eagle Candy Store |
| 1926, 1928, 1932 | Subject property not listed |
| 1933, 1938 | 2942 College Avenue - College Cleaning & Dying Works |

| Year(s) | Address - Occupant Listed |
|---|---|
| 1938 | 2924 College Street - Schaidt August Tailor |
| 1940 | Subject property not listed |
| 1943 | 2942 College Avenue - Walter Gertrude Groesbeck, clothes cleaner |
| 1945 | 2942 College Avenue - College Cleaning & Dying Works Berkeley |
| 1946 | Subject property not listed |
| 1950 | 2942 College Avenue - College Cleaners & Dyers, Frances Boyd Hosiery Repair |
| 1951, 1954 | Subject property not listed |
| 1955 | 2942 College Avenue - College Cleaners & Dyers Berkeley |
| 1956, 1959, 1960 | Subject property not listed |
| 1962 | 2942 College Avenue - College Cleaners |
| 1965, 1967 | Subject property not listed |
| 1970 | 2942 College Avenue - College Cleaners Berkeley |
| 1973 | Subject property not listed |
| 1975 | 2942 College Avenue - College Cleaners |
| 1976, 1979 | Subject property not listed |
| 1980 | 2942 College Avenue - College Cleaners |
| 1982, 1984 | Subject property not listed |
| 1986, 1991, 1992 | 2942 College Avenue - College Cleaners |
| 1993 | Subject property not listed |
| 1994 | 2942 College Avenue - College Cleaners |
| 1996 | 2942 College Avenue - C&C Cleaners |
| 2002 | Subject property not listed |
| 2004, 2006, 2009, 2014, 2017 | 2942 College Avenue - C&C Cleaners*<br><br>*Sung Balk in 2004 |

*If listed above, XXXX indicates that the address is valid but there is no occupancy information available.*

Based on review of the city directories, the subject property was identified to be occupied by dry cleaning facilities from 1925 to 2017; refer to Section 4.6 for further discussion.

### 3.4 Historical Topographic Maps

Based on the quality of information obtained from other sources, historical topographic maps were not reviewed as a part of this assessment.

### 3.5 Chain of Title

Based on the quality of information obtained from other sources, 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

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| City of Berkeley Toxics Management Division (TMD) - CUPA | May 25, 2021 | Website | Mr. Paul Miller, TMD Staff | Records discussed below |
| Alameda County Department of Environmental Health Local Oversight Program database | June 8, 2021 | Website | n/a | No records on file |

Files were available for years dating back to 1996 and consisted of prior technical reports, hazardous materials business plans (HMBPs), hazardous materials inspections, notice of violation documentation, stormwater facility inspection forms, enforcement orders, waste manifest forms, invoices, eviction notices for C&C Cleaners in 2018, agency-RP correspondence, and other administrative forms.

Per an August 2011 HMBP, C&C Cleaners is listed as storing a maximum daily amount of 140 gallons of dry cleaning fluid (DF-2000, an isoparaffinic hydrocarbon-based fluid) and 60 gallons of waste solvent (DF-2000) within steel drums.

Per a December 2013 HMBP, C&C Cleaners is listed as storing a maximum daily amount of 35 gallons of PCE within a steel drum, 25 gallons of waste PCE within a steel drum, 55 gallons of waste water contaminated with PCE within a steel drum, 40 gallons of soaps and detergents within plastic bottles, and 5 gallons of spot cleaners within plastic bottles. A hazardous waste manifest was on file for the disposal of an undetermined quantity of waste PCE and non-RCRA hazardous liquid waste in July 2013. Based on an August 2011 TMD Fee Summary Sheet, C&C Cleaners is listed as storing or handling 160 gallons of hazardous materials and 80 gallons of hazardous waste. Based on a June 2014 TMD Fee Summary Sheet, C&C Cleaners is listed as storing or handling 200 gallons of hazardous materials and 60 gallons of hazardous waste. Based on a June 2017 TMD Fee Summary Sheet, C&C Cleaners is listed as storing or handling 204 gallons of hazardous materials and 60 gallons of hazardous waste.

Notice of violations were issued for lack of or accurate HMBP documentation, failure to submit facility closure documents, failure to submit annual reports, and failure to submit required reports for the Stoddard solvent and PCE cases. In November 2011, a compliance inspection performed by the TMD observed dry cleaning machines, more than 55 gallons of a petroleum-based cleaner, and a drum with a hazardous label. Hazardous materials inspections were performed in 2012; violations were issued for incomplete business information, and failure to submit hazardous materials inventory statements/HMBPs. An April 2012 hazardous materials inspection

report indicates that PCE operation had been discontinued as part of C&C Cleaners operations and would be installing a new hydrocarbon dry cleaning machine. Hazardous waste was observed to be property stored and labeled during a November 2013 compliance site inspection; no violations were issued.

Additional information regarding included technical reports and the identified release of PCE to the subsurface and subsequent site investigation work are discussed in Section 4.6.

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| California Environmental Protection Agency (CalEPA) | June 6, 2021 | Website | N/A | Records discussed below |

The subject property, identified as College Cleaners with an address of 2942 College Avenue, is listed as a Leaking Underground Storage Tank (LUST) site with an environmental interest end of 12/28/2004 and a Cleanup Program site with an environmental start date of 12/05/1992; refer to Section 4.6 for further discussion.

## 4.2 FIRE DEPARTMENT

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| Berkeley Fire Department (BFD) | May 25, 2021 | Website | Ms. Cynthia McClellan, BFD Staff | Records discussed below |

*Records Summary*

| Date | Occupant | Document Type | Document Notes/Violations |
|---|---|---|---|
| 1959 to 1993 | College Cleaners with a owner of Wells Fargo Bank | BFD Inspection Log | The log included inspections of the dry cleaning facility, solvent machine area, UST testing inspections, UST decommissioning and removals, fire prevention concerns, and health and safety.<br><br>Review of the documents revealed the following:<br><br>• In 1966, new machinery was installed;<br>• In 1969, two tanks, an oil and potential solvent tank, were removed from the front sidewalk, one tank was unable to be removed due to an overlying water line, the tank was pumped out and filled with sand mix and grout; |

| Date | Occupant | Document Type | Document Notes/Violations |
|---|---|---|---|
| | | | • In 1992, two Stoddard solvent USTs were unable to be removed due to access problems, **a third tank was also indicated as found**<br>• In 1993, removal of a 70-gallon tank was witnessed (note stated it was not a 500 gallon) |
| February 1992 | College Cleaners | Fire Permit | Permit for the precision testing of a solvent tank |
| November 1992 | College Cleaners | Fire Permit | Permit for the removal of one 250-gallon and one 1,000-gallon UST |
| February 1993 | College Cleaners | Fire Permit | Permit for the removal of a 70-gallon oil UST (500 gallon was crossed out) |
| April 1995 | Well Fargo Bank | Fire and Building Permits | Permits for the removal of a 400-gallon UST from rear of subject property |

Other documents included UST Cleanup Fund-related and consultant/agency correspondence.

Refer to Section 4.6 for further discussion of the former on-site dry cleaning facilities and associated release cases/former USTs.

### 4.3 BUILDING DEPARTMENT

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| Berkeley Building and Safety Division (BBSD) | May 25, 2021 | Email | BBSD Staff | Records discussed below |

Files were available for years 1947 to 2021 and consisted of building permits, inspection tickets, permits for UST removals, invoices, agency-tenant correspondence, and administrative documents. Building permits consisted of demolition and electrical, plumbing, signage, roofing, machine placement, and interior partition alterations. On file was a demolition permit for the removal of three structures in 1994. The property appears to be slated for mixed-use redevelopment, as noted in a permit from March 2021.

Refer to Section 4.6 for further discussion of the former on-site dry cleaning facilities.

### 4.4 PLANNING DEPARTMENT

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| Berkeley Planning and Development Division (BPDD) | May 25, 2021 | Website | Mr. Steve Schoonover, BPDD Staff | Per the City of Berkeley Zoning map, the subject property is zoned Elmwood Commercial (C-E). The subject property is located within a City of Berkeley Environmental Management Area. No evidence indicating the existence of AULs on file for the subject property. |

The subject property is located with the Berkeley Toxics Management Division (BTMD) Environmental Management Area (EMA). The EMA is an area within the City of Berkeley where known and/or suspected groundwater contamination is present. When construction projects are proposed, the BTMD reviews project descriptions to determine if any special requirements would be applicable. Such requirements can apply to certain excavation or dewatering activities.

### 4.5 ASSESSOR'S OFFICE

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| Alameda County Assessor's Office | June 6, 2021 | Website | N/A | Information obtained is discussed below |

*Records Summary*

| | |
|---|---|
| **APN** | 52-1568-9 |
| **Acreage** | 0.147 acres |
| **Construction Date** | Not provided |
| **Building Square Footage** | Not provided |
| **Current Owner** | Not provided |
| **Additional Information** | According to the key site contact, the current main structure has an area of approximately 2,317 square feet and was constructed circa 1900. However, a State of California Department of Parks and Recreation historical survey indicated that the building was constructed in 1910.<br><br>According to online research (PropertyShark.com), current property ownership is vested in Srue Corporation & Dan Mar Corporation since 1997. |

### 4.6 OTHER AGENCIES SEARCHED

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| CA State Regional Water Resources Control Board (RWRCB) GeoTracker | June 6, 2021 | Website | N/A | Records discussed below |

| Agency | Date Contacted | Method of Contact | Name & Title of Contact | Agency Response |
|---|---|---|---|---|
| RWQCB (formal FOIA) | May 25, 2021 | Email | N/A | Response pending, refer to Section 1.5 |
| CA Department of Toxic Substances Control (DTSC) Hazardous Waste Tracking System (HWTS) | June 6, 2021 | Website | N/A | Records discussed below |
| CA DTSC EnviroStor | June 6, 2021 | Website | N/A | No records on file |
| Bay Area Air Quality Management District (BAAQMD) | May 25, 2021 | Email | Ms. Rochele Henderson, Public Records Section | Records discussed below |

*RWRCB online GeoTracker database*

The subject property is reported to have been operated as a dry cleaning facility since 1910. The subject property was formerly occupied by College Cleaners and subsequently by C&C Cleaners. Three USTs were removed from the subject property in 1993, including one heating-oil UST (70-gallon) and two Stoddard solvent USTs (250-gallon and 1,000-gallon). In addition, one Stoddard solvent UST (470-gallon) was reportedly discovered in December 1994 and removed in 1995. The USTs removed from the subject property were reported to have stored Stoddard solvent, petroleum naphtha, during the period College Cleaners and predecessor dry cleaners operating prior to 1995. The former dry cleaners were noted to have used and stored tetrachlorothene (PCE).

Soil investigations were performed between 1992 and 1995 and included collection of approximately 53 soil samples from soil borings and test pits. The following maximum concentrations were reported in soil: PCE at 0.14 ppm, Total Petroleum Hydrocarbons (TPH) at 6,750 parts per million (ppm), TPH as diesel (TPHd) at 4,000 ppm, TPH as gasoline (TPHg) at 1,400 ppm, oil and grease at 19 ppm, benzene at 0.055 ppm, toluene at 0.65 ppm, ethylbenzene at 1.7 ppm, and xylenes at 14 ppm.

In June 1997, soil excavation was performed to remove petroleum hydrocarbon-impacted soil from the area of the former 470-gallon Stoddard solvent UST. The excavation extended to depths of 14 feet bgs and included the removal of approximately 200 cubic yards of impacted soil. Groundwater was not encountered in the excavation cavity. TPHg and oil and grease were detected in the confirmation samples at maximum concentrations of 5,000 ppm and 250 ppm, respectively. Confirmation soil sampling indicated that the extent of impacted soil appeared to be restricted to a limited area that is inaccessible for additional excavation due to its proximity to the building wall and underlying foundation.

Groundwater investigations were first initiated in 1993 and 1994 with the installation of wells MW-1 through MW-5; the wells were monitored on a quarterly basis until January 2004. Wells MW-1 and MW-5 are located within 20 feet of the former USTs; MW-5 was located northeast of a former sump; wells MW-2 and MW-3 upgradient and crossgradient, and off-site well MW-4 approximately 150 feet downgradient (west) of the former USTs. Historical water level data in the wells has varied seasonably from approximately 6 to 24 feet bgs with a groundwater

flow generally to the west. From 1994 to 2004, TPHg and Stoddard solvent were detected at maximum concentrations of 34,000 parts per billion (ppb) and 22,000 ppb were detected in wells MW-1 and MW-4. Minor concentrations of toluene, ethylbenzene, and total xylenes were also detected in the wells. From 1994 to 2004, PCE was detected ranging in concentration from 0.7 ppb to 860 ppb (May 2000 in MW-5) in wells MW-1, MW-2, MW-3, and MW-5.

Soil gas investigations were first conducted at the subject property in response to observed PCE in groundwater monitoring well MW-5 in November 2000. Soil gas investigations were performed in an effort to identify and characterize potential areas where PCE may have been released to the subsurface. Soil gas sample results revealed the presence of soil gas in PCE at a maximum concentration of 36 micrograms per liter in the rear lot and along the sewer line. No other VOCs other than PCE were detected in the soil gas samples. Soil gas data indicated PCE may have been released to shallow soil via possible leaks of solvent discharged into an underground sewer line and/or surface spills in the area directly behind the property building. Evaluation of site data indicated possible separate sources for the releases of petroleum hydrocarbons and PCE to subsurface soils.

In Azure Environmental's (Azure's) *Summary of Corrective Action Work Plan and Ground Water Beneficial Use Evaluation, Former College Cleaners Facility, 2942 College Avenue, Berkeley, California*, dated November 28, 2001, Azure concluded that there were separate sources for the petroleum hydrocarbons and PCE, with recent sampling indicating that the PCE did not appear to be related to historical operations of former on-site USTs. Azure recommended case closure of the Stoddard solvent release from the former on-site USTs in the above report. SECOR International Inc. petition for case closure of the Stoddard solvent release in a letter dated January 15, 2002. The Stoddard solvent case was granted closure by the TMD in a letter dated December 30, 2004, with the condition that any redevelopment of the subject property will require TMD approval. In the closure letter, the TMD indicated that subject property owner continue corrective measures assessment and monitoring for the PCE investigation. The TMD noted in the letter that Wells Fargo, on behalf of the Cassie Conwell Trust, has declared their role in the investigation of the subject property is limited to release of Stoddard solvent and that it was undetermined who would be the responsible party for continued investigation of the PCE release.

During the First Quarter 2004 groundwater monitoring event, PCE was detected in wells MW-1 and MW-5 at concentrations of 1,800 ppb and 400 ppb, respectively.

No other work appears to have been performed at the subject property from 2005 to 2020.

*CalEPA HWTS online database*

College Cleaners, with an address of 2942 College Avenue, is listed as generating 6.15 tons of other empty containers >=30 gallons (likely reference to former USTs), liquids with halogenated organic compounds >=1,000 milligrams per liter between 1993 and 2003, 0.5795 tons of halogenated solvents in 1999 and 2000, and 1.9 tons of waste and mixed oil in 1995.

EPA IDs were obtained for the subject property address under the names C&L/C Cleaners in 2007 and 2013; however, no waste manifest data was available.

*BAAQMD Files*

College Cleaners, with an address of 2942 College Avenue, is listed as a BAAQMD plant with end dates of 12/09/1994 and 12/01/2012. The facility is listed as a "Hoyt petroleum solvent" plant with a dry cleaning machine. From June 2010 to June 2011, the facility is listed as emitting 1.91 pounds of perchlorothene (PCE) a day.

### 4.7 Oil and Gas Wells

| Agency | Date Referenced | Resource | Oil or gas wells located within 500 feet of the subject property |
|---|---|---|---|
| California Geologic Energy Management Division (CalGEM) | June 6, 2021 | CalGEM Map | No |

### 4.8 Oil and Gas Pipelines

| Agency | Date Referenced | Resource | Pipelines located within 500 feet of the subject property |
|---|---|---|---|
| National Pipeline Mapping System (NPMS) | June 6, 2021 | NPMS Public Map Viewer | No |

### 4.9 State Environmental Superliens

In accordance with our approved scope of services, AEI did not assess whether the subject property is subject to any state environmental superliens.

### 4.10 State Property Transfer Laws

In accordance with our approved scope of services, AEI did not assess whether the subject property is subject to any state property transfer laws.

# 5.0 REGULATORY DATABASE RECORDS REVIEW

AEI contracted 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, which includes detailed descriptions of the databases noted below, is included in Appendix C of this report.

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.

Regulatory database listings associated with the subject property, adjoining site(s) and/or nearby sites of concern that were determined to warrant additional discussion are identified and further discussed in Section 5.1.

## 5.1 RECORDS SUMMARY

| Database | Search Distance (Miles) | Listings Within Search Distance | Subject Property | Adjoining Site(s) | Other Nearby Sites of Concern |
|---|---|---|---|---|---|
| NPL | 1.0 | 0 | | | |
| DELISTED NPL | 0.5 | 0 | | | |
| SEMS/CERCLIS | 0.5 | 0 | | | |
| SEMS-ARCHIVE/CERCLIS NFRAP | 0.5 | 0 | | | |
| RCRA CORRACTS | 1.0 | 0 | | | |
| RCRA-TSDF | 0.5 | 0 | | | |
| RCRA LQG, SQG, CESQGs, NLR | SP/ADJ | See below | | ✔ | |
| US ENG CONTROLS | SP | 0 | | | |
| US INST CONTROLS | SP | 0 | | | |
| ERNS | SP | 0 | | | |
| STATE/TRIBAL HWS | 1.0 | 6 | ✔ | | |
| STATE/TRIBAL SWLF | 0.5 | 0 | | | |
| STATE/TRIBAL REGISTERED STORAGE TANKS | SP/ADJ | 0 | | | |

| Database | Search Distance (Miles) | Listings Within Search Distance | Subject Property | Adjoining Site(s) | Other Nearby Sites of Concern |
|---|---|---|---|---|---|
| STATE/TRIBAL LUST | 0.5 | 17 | ✔ | ✔ | |
| STATE/TRIBAL EC and IC | SP | 0 | | | |
| STATE/TRIBAL VCP | 0.5 | 0 | | | |
| STATE/TRIBAL BROWNFIELD | 0.5 | 0 | | | |
| ORPHAN | N/A | 2 | | | |
| ADDITIONAL ENVIRONMENTAL RECORD SOURCES | SP/ADJ | See below | ✔ | ✔ | |

| | |
|---|---|
| **Facility Name** | College Cleaners, C&C DryCleaner |
| **Address** | 2942 College Avenue, Berkeley, CA |
| **Distance & Direction** | Subject Property |
| **Hydrologic Position** | N/A |
| **Databases Listed** | CPS-SLIC (x2), LUST (x2), RGA LUST, SWEEPS UST, CA FID UST, DRYCLEANERS, EDR HIST CLEANERS (x2), HWTS (x2), CERS (x2), FINDS (x2), CORTESE, HIST CORTESE, HAZNET, EMI |
| **Comments** | According to the regulatory database, the subject property was historically occupied by various dry cleaners as early as 1925 (College Cleaning and DyeWorks) through at least 2014 (C&C Dry Cleaners).<br><br>Various hazardous waste listings were noted including generation of halogenated solvent waste and other empty containers > 30-gallons. These are references to the former dry cleaning operations and former removed USTs.<br><br>The former dry cleaners and associated release cases are further discussed in Sections 4.1, 4.2, and 4.6. |

| | |
|---|---|
| **Facility Name** | Elmwood Market, Bluemercury Berkeley, John Gordon |
| **Address** | 2944, 2950, 2952, 2956 College Avenue, Berkeley, CA |
| **Distance & Direction** | Adjoining to the south |
| **Hydrologic Position** | Crossgradient |
| **Databases Listed** | EDR HIST AUTO (2944 College Avenue)/RCRA-VSQG (2950 College Avenue)/RCRA-NONGEN/NLR (2952 College Avenue)/HWTS, CERS HAZ WASTE, HAZNET (2956 College Avenue) |
| **Comments** | Elmwood Market, with an address of 2944 College Avenue, is listed as a gasoline station from 2001 to 2008.<br><br>John Gordon, with an address of 2952 College Avenue, is listed as a non-generator of hazardous waste (RCRA-NONGEN/NLR), filed in February 2019, with no noted evaluations or violations. |

| | |
|---|---|
| | Bluemercury Berkeley, with addresses of 2950 and 2956 College Avenue, is listed as a conditionally-exempt small quantity generator (RCRA-VSQG), filed in September 2020, with no noted evaluations or violations. Per the RCRA-VSQG listing, the facility is listed as generating ignitable waste. The facility is listed as generating 0.19 tons of other inorganic solid waste in 2005 which was transported off-site for transfer.<br><br>Review of available historical information for the address of 2944 College Avenue is not consistent with the reported gasoline station from 2001 to 2008; this listing is expected to be erroneous. 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 a significant environmental concern. |

| | |
|---|---|
| **Facility Name** | Gordon Commercial Property, Wright's Automotive, London Jacks Fine Cleaners, TA Haroney |
| **Address** | 2929, 2635, 2639 Ashby Avenue, Berkeley, CA |
| **Distance & Direction** | Adjoining to the south |
| **Hydrologic Position** | Cross-gradient |
| **Databases Listed** | LUST, CORTESE, RCRA-LQG, HIST CORTESE (2929 Ashby Avenue)/EDR HIST CLEANER (2635, 2639 Ashby Avenue) |
| **Comments** | *LUST Case*<br><br>Wright's Automotive, with an address of 2629 Ashby Avenue, is listed as a former LUST case granted closure in June 1999. According to the June 1999 case closure summary available on the GeoTracker online database, a release of petroleum hydrocarbons was identified following the removal of one 500-gallon and one 1,000-gallon gasoline USTs in 1996. During the UST removals, 37.4 tons of impacted soil was removed and transported off-site for disposal. A soil and groundwater investigation was performed in 1997. The LUST case was granted closure by the RWQCB in a letter dated June 25, 1999. At the time of closure, the following maximum concentrations were reported in groundwater: 1,000 ppb gas, 9 ppb benzene, 5 ppb toluene, 34 ppb xylenes, 12 ppb ethylbenzene, and 9 ppb methyl tertiary butyl ether (MTBE).<br><br>Based on the closed regulatory status of the release, time elapsed since closure and review of associated data, this adjacent former LUST case is not expected is not expected to represent a significant environmental concern at this time.<br><br>*Other Listings*<br><br>Gordon Commercial Property, with an address of 2629 Ashby Avenue, is listed as a large quantity generator of hazardous waste (RCRA-LQG), filed in April 2008, with no noted evaluations or violations. Per the RCRA-LQG listing, the facility is listed as generating the following hazardous wastes: ignitable and corrosive waste, chromium, lead, methyl ethyl ketone, and oil/water separator sludges.<br><br>London Jacks Fine Cleaners and TA Haroney, with address of 2635 and 2639 Ashby Avenue, are listed as former dry cleaners in 2008 and 1933, respectively. |

| | |
|---|---|
| | Based on the lack of a documented release, gradient and apparent short duration of the dry cleaner facilities, the review of regulatory agency files for this site was not deemed necessary, and the site is not expected to represent a significant environmental concern. |

## 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.

Potential vapor migration concerns for the subject property are discussed in Section 4.6.

# 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 OWNER AND KEY SITE MANAGER

| Relation to Property | Name | Date Interviewed | Method of Contact | Year First Associated w/ Property | Notes |
|---|---|---|---|---|---|
| Owner/Owner Representative | Srue Corporation & Mar Dan Corporation | May 26, 2021 | In Person | 1997 | Interviewed; see Interview Summary table below |
| Key Site Manager | Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises | May 26, 2021 | In Person | 2005 | Owner is acting Key Site Manager; see Interview Summary table below |

*Interview Summary*

| Question | Owner (Representative) Response/Comment | Key Site Manager Response/ Comment |
|---|---|---|
| Do you have any knowledge of USTs, clarifiers or oil/water separators, sumps, or other subsurface features? | Yes; Mr. Anhalt was aware of the USTs discussed in Section 4.6 | N/A |
| Do you have any knowledge of previous environmental investigations conducted on site? | Yes; Mr. Anhalt was aware of the environmental work discussed in Section 4.6 | N/A |
| Do you have any knowledge of current or past industrial operations and/or other operations which would involve the use of hazardous substances and/or petroleum products? | Yes; Mr. Anhalt was aware of the prior on-site dry cleaners discussed in Section 4.6 | N/A |
| Are you aware of any known plans for site redevelopment or change in site use? | Yes | N/A |
| Are you aware of any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property? | No | N/A |
| Are you aware of any pending, threatened or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the property? | No | N/A |
| Are you aware of any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products? | No | N/A |
| Are you aware of any incidents of flooding, leaks, or other water intrusion, and/or complaints related to indoor air quality? | No | N/A |

| Question | Owner (Representative) Response/Comment | Key Site Manager Response/ Comment |
|---|---|---|
| Additional information provided: | None | N/A |

### 6.1.2 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.

### 6.1.3 Interview with Others

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

## 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.

| Question | Response/ Comment |
|---|---|
| **1. Environmental liens that are filed or recorded against the property (40 CFR 312.25)**<br><br>Did a search of recorded land title records (or judicial records where appropriate) identify any environmental liens filed or recorded against the property under federal, tribal, state or local law? | Information not provided |
| **2. Activity and use limitations that are in place on the property or that have been filed or recorded against the property (40 CFR 312.26(a)(1)(v) and vi)).**<br><br>Did a search of recorded land title records (or judicial records where appropriate) identify any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the property under federal, tribal, state or local law? | Information not provided |
| **3. Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).** | Information not provided |

| Question | Response/ Comment |
|---|---|
| Do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business? | |
| **4. Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29).**<br><br>Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property? | Information not provided |
| **5. Commonly known or reasonably ascertainable information about the property (40 CFR 312.30).**<br><br>Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example:<br>(a) Do you know the past uses of the property?<br>(b) Do you know of specific chemicals that are present or once were present at the property?<br>(c) Do you know of spills or other chemical releases that have taken place at the property?<br>(d) Do you know of any environmental cleanups that have taken place at the property? | Information not provided |
| **6. The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).**<br><br>Based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property? | Information not provided |

### 6.3 Previous Reports and Other Provided Documentation

No prior reports or other relevant documentation in association with the subject property was made available to AEI during the course of this assessment.

### 6.4 Environmental Lien Search

In accordance with our approved scope of services, an environmental lien search was not performed as part of this assessment.

# 7.0 SITE RECONNAISSANCE

| | |
|---|---|
| **Site Reconnaissance Date** | May 26, 2021 |
| **AEI Site Assessor(s)** | Adrian Angel |
| **Property Escort(s)/ Relationship(s) to Property** | Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises |
| **Units/Areas Observed** | Interior subject property building and rear outbuildings; exterior areas |
| **Area(s) not accessed and reason(s)** | None |
| **Other Physical Constraints** | None |

*Reconnaissance Findings Summary*

| Feature | Observed on Subject Property (see Section 7.1) | Observed on Adjoining Property (see Section 7.2) |
|---|---|---|
| Regulated Hazardous Substances/Wastes and/or Petroleum Products in Connection with Property Use | | |
| Aboveground/Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs/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 | | |
| Other | | |

## 7.1 SUBJECT PROPERTY RECONNAISSANCE FINDINGS

During the site reconnaissance, AEI observed the items listed in the above Reconnaissance Findings Summary table, which are further discussed below.

### 7.1.1 HAZARDOUS SUBSTANCE AND PETROLEUM PRODUCT CONTAINERS NOT IN CONNECTION WITH PROPERTY USE

| Substance/Waste | Size/Quantity | Location | Secondary Containment | Staining/Spills |
|---|---|---|---|---|

| | | | | |
|---|---|---|---|---|
| Investigation-derived waste (IDW) | 55-gallon drum/1 and 5-gallon bucket/2 | Exterior west side of property building | No | No |

The drum and buckets appear to be related to recent on-site subsurface investigation work. Refer to Section 4.6 for further discussion of subsurface conditions and investigations.

### 7.1.2 Drains, Sumps, and Clarifiers

Trench drains were observed within the garage area and within the boiler outbuilding.

Refer to Section 4.6 for discussion of subsurface conditions and investigations.

### 7.1.3 Wells

Several groundwater and vapor wells were observed on the rear lot and within the front gutter on College Avenue. Refer to Section 4.6 for discussion of subsurface conditions and investigations.

## 7.2 Adjoining Property Reconnaissance Findings

During the site reconnaissance, AEI observed the items listed in the above Reconnaissance Findings Summary table, which are further discussed below.

### 7.2.1 Drains, Sumps, and Clarifiers

Several storm drains were observed in the parking areas of the adjoining properties and adjoining roadways. AEI did not observe evidence of hazardous substances or petroleum products in the vicinity of the drains. Based on the use of the drains solely for storm water runoff, the presence of the drains is not expected to represent a significant environmental concern.

# 8.0 NON-ASTM SERVICES

## 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 1970s. Common ACMs include pipe-covering, insulating cement, insulating block, refractory 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 (the Green Book). In 1973 the 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 US 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.

Due to the age of the subject property buildings, there is a potential that ACMs are present. A limited list of typical suspect ACMs is included in the following table:

| Material Type | Location |
|---|---|
| Plaster (acoustical and smooth) | Walls and ceilings |
| Ceiling tile | Ceiling systems |
| Thermal systems insulations, packings, and gaskets | Heating systems, cooling systems, domestic and heating and cooling piping, ductwork, and other equipment |
| Floor tile and associate mastics, flooring felts, and papers (under hardwood/other) | Floors |
| Vinyl sheet flooring and adhesives | Floors |
| Cove base and associated mastics | Walls |
| Ceramic tile adhesives and grouts | Walls, floors, and ceilings |
| All adhesives | Mirrors, wall coverings, construction, etc. |
| Grout and caulking | Windows and doors |
| Gypsum board, tape, and joint compound | Wall and ceiling systems |
| Insulation materials | Walls, ceilings, and attic spaces |
| Roofing materials (felts, rolled, shingle, flashings, adhesives, tar, and insulations) | Roof and parapet wall systems |
| Brick and block, mortars | Walls |

According to the property owner, demolition of the subject property buildings is planned for the near future. Regardless of building construction date, the EPA's NESHAP requires that a thorough asbestos survey be performed prior to demolition or renovation activities that may disturb ACMs. This requirement may be enforced by federal, state and local regulatory agencies, and specifies that all suspect ACMs be sampled to determine the presence or absence of asbestos prior to any renovation or demolition activities which may disturb them to prevent potential exposure to workers, building occupants, and the environment.

## 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.

Under OSHA, lead-containing paint (LCP) is defined as any paint with any detectable amount of lead present in it. Therefore, all LBP is considered LCP. Conversely, LCP may not meet the criteria to be considered LBP in accordance with HUD guidelines or some states' definition of LBP.

It is important to note that LCP may create a lead hazard when being removed. The condition of these materials must be monitored when they are being disturbed. In the event LCP 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; however, some paints utilized after 1978 will be LCP under OSHA. Structures built prior to 1978 and especially prior to the 1960s should be expected to contain LBP.

Due to the age of the subject property buildings, there is a potential that LBP is present. AEI understands that renovation and/or demolition activities of the subject property buildings are planned. AEI presumes that the planned renovation and/or demolition activities will be performed in accordance with applicable regulations. It should be noted that construction activities that disturb materials or paints containing any amount of lead may be subject to certain requirements of the OSHA lead standard contained in 29 CFR 1910.1025 and 1926.62.

### 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 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 may occur, particularly if the moisture problem remains undiscovered or unaddressed. 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 spores or the toxins they emit when they are present in large numbers. This can occur 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.

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. Potential areas of mold growth, such as in pipe chases, HVAC systems, and behind enclosed walls and ceilings, were not observed as part of this limited assessment.

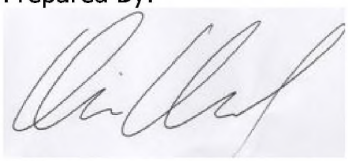
AEI observed interior areas of the subject property buildings to identify the potential presence of mold. AEI did not note obvious visual or olfactory indications of the presence of mold, nor did AEI observe obvious indications of significant water damage. As such, no bulk sampling of suspect surfaces was conducted as part of this assessment and no additional action with respect to suspect mold appears to be warranted at this time.

## 9.0 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:



Adrian Angel
Associate Consultant

Reviewed By:

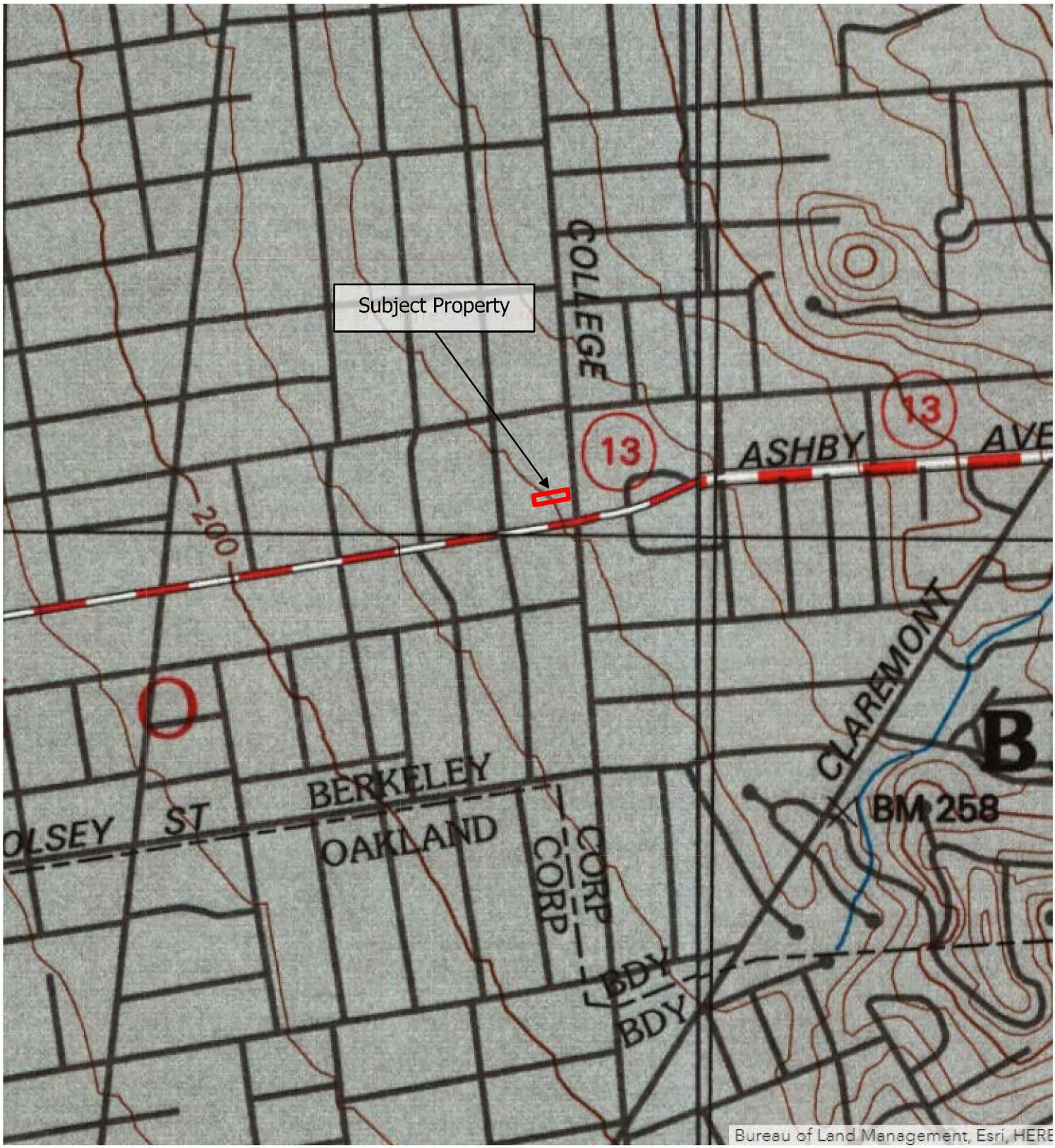
Katie Hindt, REPA
Senior Author

## 10.0 REFERENCES

| Item | Date(s) | Source |
|---|---|---|
| Soils Information | Accessed June 2021 | USDA Web Soil Survey http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx |
| Topographic Map | 1993 | USGS, Oakland West |
| Depth to Groundwater Information | Accessed June 2021 | Groundwater monitoring on the subject property |
| Aerial Photographs | 1939-2016 (non-inclusive) | EDR |
| Sanborn Map Report/Search | 1911-1980 (non-inclusive) | EDR |
| City Directories | 1920-2017 (non-inclusive) | EDR |
| Environmental Health Department | May 25, 2021<br><br>June 8, 2021 | City of Berkeley Toxics Management Division<br><br>Alameda County Department of Environmental Health Local Oversight Program database |
| State Environmental Agency | June 6, 2021 | California Environmental Protection Agency |
| Fire Department | May 25, 2021 | Berkeley Fire Department |
| Building Department | May 25, 2021 | Berkeley Building and Safety Division |
| Planning Department | May 25, 2021 | Berkeley Planning and Development Division |
| Assessor's Information and Parcel Map | June 6, 2021 | Alameda County Assessor's Office |
| Other Agencies Searched | May 25, 2021 (BAAQMD, RWQCB)<br><br>June 6, 2021 (others) | SWRCB GeoTracker, RWQCB, DTSC HWTS, DTSC EnviroStor, BAAQMD |
| Oil and Gas Wells | June 6, 2021 | California Geologic Energy Management Division |
| Oil and Gas Pipelines | June 6, 2021 | NPMS Public Map Viewer https://www.npms.phmsa.dot.gov/PublicViewer/composite.jsf |
| Regulatory Database Report | May 24, 2021 | EDR |
| Interview with Owner | May 26, 2021 | Srue Corporation & Mar Dan Corporation |
| Interview with Key Site Manager | May 26, 2021 | Jeffrey Anhalt, Risk Manager, Rue-Ell Enterprises |
| Radon Zone Information | 1993 | US EPA Map of Radon Zones https://www.epa.gov/radon |

# APPENDIX A

# FIGURES



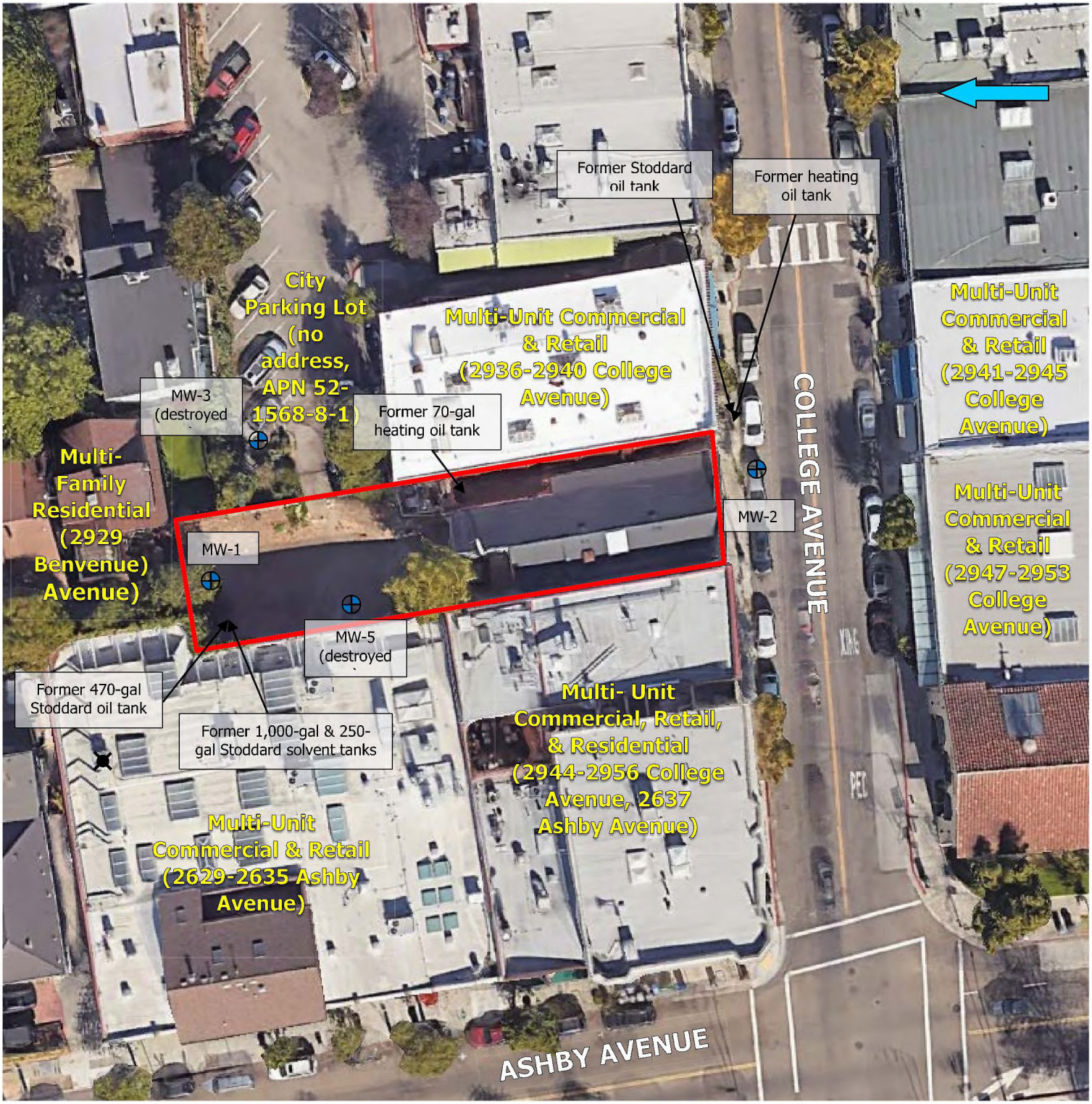

Legend
Approximate Subject Property Boundary
Source: USGS Topographic Map *Oakland West, California* (1993)

N

# Figure 1: TOPOGRAPHIC MAP

2942 College Avenue, California 94705
Project Number: 430782

AEI Consultants




Legend

Estimated Groundwater Flow Direction ➡ Groundwater Monitoring Well ⊕

Approximate Property Boundary ——

Listed in Environmental Database Report *

N

# Figure 2: SITE MAP

2942 College Avenue, California 94705

Project Number: 430782

AEI Consultants