1 Introduction

Dudek was retained by Merlone Geier to prepare a Historical Resources Technical Report for the proposed Buena Park Downtown project (Project). This section provides a description of the Project, including information about the location, setting, and proposed Project activities. This section also presents the regulatory setting for the Project, and a description of the Built Environment Study Area.

1.1 Project Location and Description

Project Location

The Buena Park Downtown Mall is located near the junction of Interstate 5 and California State Route 91 in Buena Park, Orange County, California (Figure 1, Project Location Map). The surrounding area is a combination of residential and commercial uses, with the Knott's Berry Farm theme park directly to the west of the Buena Park Downtown Mall. The approximately 28-acre Project site is bound by La Palma Avenue to the north, Stanton Avenue to the west, the Buena Park Downtown Mall property to the east, and single-family residential development to the south. The Project site is zoned CR (Regional Commercial).

The property boundary of the Buena Park Downtown Mall encompasses eight parcels developed with a large commercial building (mall complex) flanked by several stand-alone buildings and landscaped spaces. Specifically, the Project site comprises one parcel: 8150 La Palma Avenue (APN 070-511-01), which contains the Sears building, parking lot, and Sears Automobile Service Station. The Sears building anchors the western end of the mall complex. Detached from the mall complex is the Sears Automobile Service Station further to the west.

The other seven parcels comprising the Buena Park Downtown Mall are immediately adjacent to the Project site. These include: 8150 La Palma Avenue (APN 070-511-01), 8376 La Palma Avenue (APN 070-511-14), 8460 La Palma Avenue (APN 070-511-07), 8201 On the Mall (APN 070-511-15), 8290 On the Mall (APN 070-511-16), 8374 On the Mall (APN 070-511-08), 8374 On the Mall (APN 070-511-05), and APN 070-511-18 (Table 1).

Table 1. Parcels Located in the Buena Park Downtown Mall Property Boundary

Address	APN	Property Description (Construction Date)	Project Site
8150 La Palma Avenue	070-511-01	Sears Building and Sears Automobile Service Station (1959)	Yes
8376 La Palma Avenue	070-511-14	Northern Detached Buildings (2003, 2004, and 2009)	Adjacent
8460 La Palma Avenue	070-511-07	Northern Detached Building (1980)	Adjacent
8201 On the Mall	070-511-15	Central Mall Addition (1961)	Adjacent
8290 On the Mall	070-511-16	Southern Addition (1979)	Adjacent
8450 On the Mall	070-511-08	Eastern Addition (2003)	Adjacent
8374 On the Mall	070-511-05	Parking lot	Adjacent
No Address	070-511-18	Parking lot	Adjacent

Project Description

Merlone Geier is proposing to redevelop the Sears building that was vacated in February 2020 at the Buena Park Downtown Mall located at 8150 La Palma Avenue in the City of Buena Park. The redevelopment plans include 1,381 residential units, 41,500 square feet of amenity and lobby space, and 2,551 residential parking spaces. The approximately 28-acre Project site is bound by La Palma Avenue to the north, Stanton Avenue to the west, the Buena Park Downtown Mall to the east, and single-family residential neighborhoods to the south. The Project site includes the Sears building, auto center, and surrounding parking lots. The property is designated "Entertainment Mixed-Use" in the City of Buena Park General Plan; it is zoned CR (Regional Commercial). Because residential uses are not permitted in the CR zoning district, a zone change would be required. A rezone to "General Mixed Use," which would allow a mix of land uses, including residential, is being contemplated.

Built Environment Study Area

The Built Environment Study Area encompasses all areas that may be affected by the proposed Project (Figure 2, Built Environment Study Area Map). This includes those areas where demolition or construction activities related to the Project may result in impacts to historical resources that are not part of the Project site. The Buena Park Downtown Mall property comprises the Project site as well as adjacent parcels that are not proposed for demolition or alteration as part of the Project. The boundaries of the Buena Park Downtown Mall property form the Built Environment Study Area for the purposes of this study. The Built Environment Study Area includes eight (8) parcels: (APNs 070-511-01, 070-511-14, 070-511-07, 070-511-15, 070-511-16, 070-511-08, 070-511-05, and APN 070-511-18). The Buena Park Downtown Mall property encompasses the proposed project footprints, areas of demolition, new construction, building renovation, and areas used for staging, if known. Defining the Built Environment Study Area as the limits of the Buena Park Downtown Mall property boundary also takes into consideration the maximum extent of potential visual and vibration-related impacts that the near-term projects could have on historic built environment resources.

which brought people from the surrounding areas to eat in the newly expanded tearoom. The restaurant's popularity resulted in long wait times, led the Knotts to develop Ghost Town, Knott's Berry Farm's first attraction, in 1940. Knott's Berry Farm, which is located to the direct west of the Buena Park Downtown Mall, continued to grow and develop, eventually becoming a 57-acre theme park. The Knott family owned the property until 1997, when it was sold to Cedar Fair, L.P., which owns and operates multiple amusement parks in the United States (Brigandi 2008; VBP 2021; Dixon 2004).

The tourism generated by Knott's Berry Farm remains the single largest source of revenue for the City. By the early 1950s, agricultural land surrounding the core of Buena Park began to be redeveloped with single-family tracts. Development was focused around I-5 and Beach Boulevard. Between 1950 and 1960, Buena Park's population increased from 5,483 to 46,601. Locals feared that Buena Park would be absorbed into neighboring cities, such as Anaheim or Fullerton.

To meet the need for with residential services and address safety issues caused by the population boom, Buena Park was incorporated as a City on January 27, 1953. That same year, the City's first city council and mayor were elected. In 1954, the Santa Ana Freeway was expanded through Downtown Buena Park, essentially eliminating the City's original commercial corridor. The freeways continued to bring suburban expansion and multiple residential tracts were developed after incorporation. In 1960, the Buena Park Downtown Mall was first developed into the Buena Park Regional Shopping Center, an open-air regional shopping mall intended to serve the growing Buena Park population. Tourism and entertainment continued to be focal points of Buena Park, with the construction of the Movieland Wax Museum in the late 1970s and Medieval Times in the early 1980s, both along Beach Boulevard. By 2000, the City's population had risen to 78,282, with the majority of the open agricultural lots seen in the 1960s infilled with single-family residences, apartment complexes, and commercial properties. As of 2019, the population of Buena Park is relatively dense, with 81,788 people residing in about ten square miles (NETR 2021; Dixon 2004; Oftelie 2020).

History of the Project Site

Following the construction of the initial Sears building in 1959, the Buena Park Downtown Mall was expanded in multiple stages over the course of a 50-year development period. In addition to physical redevelopment projects, the property changed names four times within its history including the following: Buena Park Regional Shopping Center (1954-1960); Buena Park Center (1961-1975); Buena Park Mall (1976-2003); and Buena Park Downtown (2004-2021). For the purposes of this report, the property will be called the Buena Park Downtown Mall, which includes the eight parcels are located both within and immediately adjacent to the Project site.

Buena Park Regional Shopping Center (1954-1960)

Between the 1930s and 1950s, the Buena Park Downtown Mall (property) was primarily farmland with several small residences spread out on multiple lots. In 1954, the newly

Appendix F

Phase I Environmental Site Assessment

Phase I and Limited Phase II Environmental Site Assessment

8150 La Palma Avenue
Buena Park, California

January 17, 2022

Prepared for:

MGP XII Buena Park Center, LLC

Prepared by:

Roux Associates, Inc.
555 12th Street, Suite 250
Oakland, California 94607

2904.0015S105ICV

Table of Contents

Tables (embedded in text)

Figures

Appendices

Executive Summary

Roux Associates, Inc. (Roux) performed a Phase I and a Limited Phase II Environmental Site Assessment (Phase I ESA and Limited Phase II) at 8150 La Palma Avenue in Buena Park, California (Property), associated with the Assessor Parcel Number (APN) 070-511-01. The Phase I ESA and Limited Phase II were performed on behalf of MGP XII Buena Park Center, LLC (MGP) (User).

The Property comprises approximately 25 acres and is currently improved with a 227,503 square-foot vacant Sears Department Store building, detached 13,360 square-foot Auto Center building that is currently operational, and paved parking areas. Roux understands that the Property use is currently commercial but may in the future be used for residential purposes. The surrounding area is mixed residential and commercial.

This Phase I ESA was performed in general accordance with ASTM Standard Practice E1527-13 on behalf of MGP XII Buena Park Center, LLC (MGP, User), and was performed to identify Recognized Environmental Conditions (RECs), controlled RECs (CRECs), and/or historical RECs (HRECs) at the Property indicating past, current, or material threats of the release of hazardous materials or petroleum hydrocarbons to the Property's soil, groundwater, soil vapor, or surface water. This Phase I ESA was conducted by investigating past Property uses, reviewing the results of a search of environmental databases, reviewing records at relevant government agencies, and performing a reconnaissance of the Property and surrounding area.

The Property was formerly used for agriculture, specifically orchards, beginning in at least 1928. By 1959, the orchards were removed, and the Property was developed with the current Sears Department Store building and Auto Center building. A dispenser island with four pumps existed to the west of the northern Auto Center building between at least 1962 and 2002, which was modified from four to two islands in 1974. In 1988, seven gasoline USTs were removed from directly north of the Auto Center. A former Sears dry-cleaning facility was suspected to have formerly existed on the Property in 1985. The Limited Phase II was performed to assess the potential impacts from the former dry cleaner.

The following RECs were identified during the Phase I ESA.

- Former and Current on-Property Auto Repair Facility, Including Former USTs and Dispenser Islands: An automobile repair facility has been present on the Property since at least 1959. Underground storage tanks were present in front of the Auto Center building between at least 1959 and 1988. In 1974, there were three 10,000-gallon USTs and in 1988, seven USTs of unknown size were removed. Additionally, dispenser islands were located west of the Auto Center building, likely between 1962 and 2002. During the Property reconnaissance, significant staining was observed at several locations in the Auto Center basement, including in the vicinity of compressors, hydraulic fluid containers, and hydraulic lifts. In Roux Associates' 2019 Focused Phase II ESA, three soil samples and three soil vapor samples were collected from the basement of the Auto Center and the vicinity of the former USTs. TPH was detected at a maximum concentration of 93,000 µg/m^3 in the Auto Center, above the residential ESL of 20,000 µg/m^3. Although exceedances were not detected for the other samples, the laboratory screening limit of 50,000 µg/m^3 was above the residential ESL, so it is possible that TPH was present at concentrations above the residential screening level but below the laboratory screening limit in the 2019 samples. In addition, the current operation at this facility operates an oil water separator (OWS), above-ground hydraulic lifts with lift cylinders that extend into the basement level, and compressors. During the reconnaissance, staining was observed in the basement of the Auto Shop building beneath the hydraulic lifts and associated hydraulic fluid tanks. This facility is therefore considered a REC for the Property.
- Potential Historical on-Property Pesticide Use: The Property was used for orchards between at least 1928 and 1959, during which time pesticides and/or herbicides may have been used. This potential

historical pesticide usage may have caused impacts to shallow soil. If the Property is to be redeveloped for residential purposes in the future, this would be considered a REC.

No CRECs or HRECs were identified during the Phase I ESA.

Based on the findings of this Phase I ESA, Roux recommends that the RECs be further investigated after the existing buildings are demolished and prior to excavation and grading activities at the Site, in compliance with Mitigation Measures 5.9-1 and 5.9-2 of the Buena Park General Plan Update Environmental Impact Report.

1. Introduction

Roux Associates, Inc. (Roux) performed a Phase I and a Limited Phase II Environmental Site Assessment (Phase I ESA and Focused Phase II) at 8150 La Palma Avenue in Buena Park, California associated with Assessor Parcel Number (APN) 070-511-01 (Property; Figure 1). The Phase I ESA and Focused Phase II were performed on behalf of MGP XII Buena Park Center, LLC (MGP; User).

The Property comprises approximately 25 acres and is currently improved with a 227,503 square-foot one-story Sears Department Store building, a detached 13,360 square-foot Auto Center one-story building that is currently occupied, and paved parking areas. The Auto Center is currently operational as a vehicle repair center, and as such, hazardous materials including batteries, cleaning chemicals, and motor oil stored in aboveground storage tanks are present at this facility. Roux understands that the Property use is currently commercial but may be used for residential purposes in the future.

This Phase I ESA was conducted in accordance with the scope of work presented in the proposal submitted to User on November 5, 2021 and in general accordance with the American Society of Testing and Materials' (ASTM) International Standard Practice E1527-13 (Standard Practice for Environmental Site Assessments), consistent with the United States Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI) Rule (40 CFR Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule).[1] The preamble for the AAI Rule states:

> *In today's final rule, EPA is referencing the standards and practices developed by ASTM International and known as Standard E1527-05 (entitled "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process") and recognizing the E1527-05 standard as consistent with today's final rule. The Agency determined that this voluntary consensus standard is consistent with today's final rule and is compliant with the statutory criteria for all appropriate inquiries. Persons conducting all appropriate inquiries may use the procedures included in the ASTM E1527-05 standard to comply with today's final rule.*[2]

This AAI Rule was subsequently amended in 2013, as indicated in the following "Background":

> *With today's action, EPA is establishing that parties seeking liability relief under CERCLA's landowner liability protections, as well as recipients of brownfields grants for conducting site assessments, will be considered to have met the standards and practices for all appropriate inquiries, as set forth in the Brownfields Amendments to CERCLA and 40 CFR Part 312, if such parties follow the procedures provided in the ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." EPA made this determination based upon the Agency's finding that the ASTM E1527-13 standard is compliant with the All-Appropriate Inquiries Rule. Therefore, parties conducting all appropriate inquiries may use the procedures in the newly issued ASTM E1527-13 standard when conducting all appropriate inquiries.*[3]

The purpose of the Phase I ESA was to identify, to the extent feasible, Recognized Environmental Conditions (RECs) in connection with the Property. ASTM Standard Practice E1527-13 defines RECs as:

> *…the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any 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*

1 Final Rule and information available at www.epa.gov/swerosps/bf/regneg.htm#final_rule, and https://federalregister.gov/a/2013-31112.

2 Federal Register: November 1, 2005 (Volume 70, Number 210), page 66081.

3 Federal Register: December 30, 2013 (Volume 78, Number 250).

release to the environment. De minimis conditions are not recognized environmental conditions.

ASTM Standard Practice E1527-13 provides that identified RECs can be evaluated and classified into Controlled Recognized Environmental Conditions (CRECs) or Historical Recognized Environmental Conditions (HRECs) based on the following definitions. ASTM Standard Practice E1527-13 defines a CREC as:

> *…a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).*

ASTM Standard Practice E1527-13 defines a HREC as:

> *…a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).*

In order to assess the potential for RECs associated with the Property, Roux utilized a variety of information sources to perform the Phase I ESA, including a radial information search from federal, state, and local regulatory agency databases as well as readily available information from the following sources: Property representative, historical aerial photographs, historical topographic maps, historical Sanborn fire insurance maps, and city directories. Additionally, Freedom of Information Act (FOIA)/public records requests to federal, state, and local regulatory agencies were submitted. The historical research and questionnaire were conducted for the purpose of developing an understanding of the following:

- Current and past use of the Property;
- Current and past use of hazardous substances and/or petroleum at the Property, if any;
- Waste management and disposal practices that might have potentially caused releases or threatened releases of hazardous substances and/or petroleum products at the Property;
- Current and past corrective actions and response activities are undertaken to address past and ongoing releases of hazardous substances and/or petroleum products at the Property, if any;
- The existence of any engineering and/or institutional controls recorded for the Property; and,
- Current and past uses of adjoining properties that could have resulted in releases or threatened releases of hazardous substances and/or petroleum products to the Property.

Roux's Principal Angela Liang Cutting Engineer, Ph.D., P.E.-CA served as the Environmental Professional who conducted the Phase I ESA, with assistance from Staff Assistant Engineer Missy Muilenburg and Staff Assistant Scientist Olivia Bowles. Ms. Cutting possesses sufficient specific education, training, and experience to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases, as defined in 40 CFR §312.1(c) on, at, in, or to a Property, sufficient to meet the objectives and performance factors in 40 CFR §312.20(e) and (f).

2. Methods of Investigation

The methods of investigation used to conduct this Phase I ESA are outlined in the following sections.

2.1 General

The activities performed in conjunction with the Phase I ESA of the Property include:

- Review of federal, state, and local environmental regulatory agency databases provided by Environmental Data Resources, Inc. of Milford, Connecticut (EDR), indicating locations of environmental concern within specified radii from the Property; and
- Submission of FOIA requests/public requests and inquiries to federal, state, and local regulatory agencies.

2.2 Review of Readily Available Information

The resources compiled and reviewed by Roux to-date include the following:

- EDR Radius Report with GeoCheck, dated November 9, 2021 (Appendix A);
- EDR United States Geological Survey Historical Topographic Maps: Downey 15-minute, Anaheim 15-minute, Anaheim 7.5-minute, Los Alamitos 7.5-minute, Artesia 7.5-minute, and Garden Grove 7.5-minute, dated 1896, 1898, 1899, 1901, 1902, 1923, 1925, 1935, 1942, (Appendix B);
- EDR aerial photographs dated 1928, 1938, 1947, 1952, 1954, 1963, 1972, 1977, 1989, 1990, 1994, 2002, 2005, 2009, 2012, and 2016 (Appendix C);
- EDR City Directory Abstract, dated November 15, 2021 (Appendix D);
- EDR Sanborn Map report dated November 9, 2021 (Appendix E);
- Public records from the public agencies listed in Table F in Section 5.2. and relevant documents obtained from public records review (Appendix F); and,
- User-provided documents (Appendix G).

2.3 Property and Surrounding Area Reconnaissance

Pursuant to ASTM Standard Practice E1527-13, Roux conducted reconnaissance of the Property on November 16, 2021 to identify, investigate, and assess potential RECs and other potential environmental concerns. Reconnaissance included observation of the Property to determine the current use and condition of the Property, and indications of past uses of the Property. During the Property reconnaissance, Roux placed particular emphasis on identifying the following features, if present, in accordance with ASTM E1527-13:

- Hazardous substances and petroleum products in connection with identified uses;
- Storage tanks;
- Odors;
- Pools of liquid;
- Drums;
- Hazardous substances and petroleum products containers;
- Unidentified substance containers;

- Polychlorinated biphenyls (PCBs);
- Heating and cooling systems;
- Stains or corrosion;
- Drains and sumps;
- Pits, ponds, or lagoons;
- Stained soil or pavement;
- Stressed vegetation;
- Solid waste;
- Wastewater;
- Wells; and,
- Septic systems.

In addition, Roux observed the general topographic setting of the Property. Photographs from the Property reconnaissance are presented in Appendix H.

3. Property Description

Descriptions of the Property and surrounding areas are included in the following sections. Figure 1 presents the location of the Property in the general context of the city of Buena Park and Figure 2 shows the current Property configuration.

3.1 Property Location and Description

The Property is located at 8150 La Palma Avenue in Buena Park, California associated with APN 070-511-01 and comprises approximately 25 acres. The Property is currently improved with a 227,503 square-foot vacant one-story Sears Department Store building, a detached 13,360 square-foot Auto Center building that is currently operational, and paved parking areas. Roux understands that the Property use is currently commercial, but may in the future be used for residential purposes. The surrounding area is mixed residential and commercial.

3.2 Surrounding Area Uses

The Property is located within the Buena Park Downtown shopping mall and is bordered by La Palma Avenue to the north, Stanton Avenue to the west, On the Mall to the south, and other retail buildings associated with the shopping mall to the east. The surrounding area is mixed residential and commercial. Table A below lists the surrounding area uses.

Table A. Surrounding Area Uses

North	Directly north of the Property is La Palma Avenue, north of which are a commercial shopping center and residential properties.
West	Directly west of the Property is Stanton Avenue. Across Stanton Avenue is the Knotts Berry theme park and associated parking lots.
South	Directly south of the Property is On the Mall, south of which are residential properties.
East	Directly east of the Property are other retail buildings in the Buena Park Downtown shopping mall and associated parking lots.

3.3 Topographic and Hydrogeologic Setting

According to the EDR Radius Map Report (Appendix A) and historical topographic maps (Appendix B), the Property elevation is approximately 85 feet above mean sea level (amsl), and the topographic gradient in the vicinity of the Property is generally flat and gently sloping to the west according to the EDR Geocheck Physical Setting Source Summary (Appendix A).

The Property is located within the Coastal Plain of Orange County groundwater basin,[4] which is bounded by the Puente and Chino Hills to the north, the Santa Ana Mountains to the east, the San Joaquin Hills to the south, the Pacific Ocean to the southwest, and a low topographic divide approximated by the Orange

4 California Department of Water Resources, 2004. *Bulletin 118, South Coast Hydrologic Region, Coastal* Plain of Orange *County Groundwater Basin. Updated* February 27.

County – Los Angeles County line on the northwest. The groundwater basin is dominated by a deep structural depression containing a thick accumulation of fresh water-bearing interbedded marine and continental sand, silt, and clay deposits. Strata in the basin are faulted and folded, and may show rapid changes in grain size. Sediments containing easily recoverable fresh water extend to approximately 2,000 feet in depth.

According to the US Fish and Wildlife National Wetlands Inventory, the nearest surface water body is Carbon Creek, an intermittent stream channel located approximately 0.9 mile south of the Property.[5]

Nearby subsurface investigation reports note that groundwater has been encountered at depths ranging from 7.5 feet to 45 feet below ground surface (bgs) and predominantly flows to the southwest.[6]

5 US Fish and Wildlife National Wetlands Inventory (https:www.fws.gov/wetlands/data/mapper.html). Accessed March 4, 2019.

6 State Water Resources Control Board (SWRCB) GeoTracker Cases: T0605900583; T0605935924; T0605901765

4. Property History

The land use history of the Property was prepared by reviewing topographic maps, historical aerial photographs, city directories, and Sanborn maps. Historical research documentation is provided in Appendices B, C, D, and E. Based on the available sources, the following chronology of the Property was developed (Table B).

Table B. Property History

Source	Year	Status
Historical Topographic Map	1896	The Property is bounded by roads to the north and west. There are two small buildings across the road to the west of the Property and several other small buildings in the surrounding area.
Historical Topographic Map	1898	The 1898 topographic map is consistent with the 1896 topographic map.
Historical Topographic Map	1899	The portion of the map with coverage of the Property is not available for the 1899 topographic map.
Historical Topographic Map	1901	The 1901 topographic map is consistent with the 1989 topographic map.
Historical Topographic Map	1902	The portion of the map with coverage of the Property is not available for the 1902 topographic map.
Historical Topographic Map	1923	The portion of the map with coverage of the Property is not available for the 1923 topographic map.
Historical Topographic Map	1925	The portion of the map with coverage of the Property is not available for the topographic map.
Aerial Photograph	1928	The Property is used for agricultural purposes, specifically, for orchards. The surrounding area is also used for agricultural purposes. Several small buildings are visible to the east and west within approximately 0.25 miles of the Property.
Historical Topographic Map	1935	According to the 1935 topographic map, the Property is at an elevation of approximately 85 feet amsl.
Aerial Photograph	1938	A small building has been constructed on the northwest corner of the Property. Otherwise, the 1938 aerial photograph is generally consistent with the 1928 aerial photograph.
Historical Topographic Map	1942/1947	The small building in the northwest corner of the Property is shown on the 1942/1947 topographic map. The presence of orchards on the Property and surrounding areas is depicted as well.
Historical Topographic Map	1943	The portion of the map with coverage of the Property is not available for the 1943 topographic map.
Historical Topographic Map	1945	The portion of the map with coverage of the Property is not available for the 1945 topographic map.
Aerial Photograph	1947	It appears from the 1947 aerial photograph that the small building shown on the 1938 aerial photograph has been removed. The Property and surrounding areas continue to be used for agricultural purposes.

Source	Year	Status
Historical Topographic Map	1949	The small building on the northwest corner of the Property is still shown on the 1949 topographic map.
Historical Topographic Map	1950	The 1950 topographic map is consistent with the 1949 topographic map.
Aerial Photograph	1952	The 1952 aerial photograph is consistent with the 1947 aerial photograph.
Aerial Photograph	1954	The 1954 aerial photograph is consistent with the 1952 aerial photograph.
Aerial Photograph	1963	There are no remaining orchards on the Property. The Property now comprises of a large building (current Department Store building) connected to a smaller building (former Garden Center building) and a loading dock to the south, another detached building to the southwest (current Auto Center building), and paved parking areas. There is a structure directly west of the Auto Center building that appears to be four dispenser islands. The Property is the western end of a larger retail center, the eastern end of which is still under development. The surrounding area has undergone dramatic development, largely comprised of residential areas. Pockets of agricultural land remain across the street to the northeast and to the southwest. Additionally, Knotts Berry Farm (an amusement park) is present west of the Property.
Historical Topographic Map	1964	The portion of the map with coverage of the Property is not available in the 1964 topographic map.
City Directory	1964	Listings for the Property are for Sears Roebuck Co.
Historical Topographic Map	1965	According to the 1965 topographic map, the Property is the western end of the Buena Park Shopping Center. The surrounding area is predominantly residential with some commercial properties. Knotts Berry Farm Theme Park is approximately 1,400 feet west of the Property.
Aerial Photograph	1972	Between 1963 and 1972, another building south of the Auto Center building was constructed on the Property. Additionally, the area across the road to the north of the Property is has been developed with buildings and paved parking areas. The eastern end of the shopping center has been completed.
Historical Topographic Map	1972	The 1972 topographic map is consistent with the 1972 aerial photograph.
City Directory	1973	Listings for the Property are for Sears Roebuck and Allstate Insurance Sales. The following off-Site listings are noted: • Buena Park Laundraclean at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • Blair's Shell Service Station at 7984 La Palma Ave, across Stanton Avenue to the west of the Property.
City Directory	1976	Listings for the Property are for Sears Roebuck, including Sears Photo Studios, and Allstate Insurance Sales. The following off-Site listings are noted:

Source	Year	Status
		• Buena Park Laundraclean at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • Bob's Super Shell Service Station at 7984 La Palma Ave, across Stanton Avenue to the west of the Property.
Aerial Photograph	1977	On the Property, the structure west of the Auto Center building that appeared to be four dispenser islands seems to have been reduced to two dispenser islands, with the northern portion of the structure appearing to have been removed.
City Directory	1982	Listings for the Property are for Sears Roebuck, USA Petroleum (a potential gasoline service station), and Allstate Insurance Sales. The following off-Site listings are noted: • Old Fashioned Cleaners at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • Bob's Super Shell Service Station at 7984 La Palma Ave, across Stanton Avenue to the west of the Property.
Historical Topographic Map	1981	The 1981 topographic map is consistent with the 1977 aerial photograph.
City Directory	1987	Listings for the Property are for Sears Roebuck, including Sears Dry-Cleaning and Photo Studios, and other retail companies. The following off-Site listings are noted: • Old Fashioned Cleaners at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • 7984 La Palma Ave is no longer listed as a gasoline service station.
Aerial Photograph	1987	A small building has been constructed on the northwest corner of the Property. The agricultural fields across the street to the southwest of the Property are now a part of a large, paved parking area.
Aerial Photograph	1989	A large new commercial development has been added across the street to the northeast of the Property. Otherwise, the 1989 aerial photograph is consistent with the 1987 aerial photograph.
Aerial Photograph	1990	The 1990 aerial photograph is consistent with the 1989 aerial photograph.
City Directory	1992	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Old Fashioned Cleaners at 7942 La Palma Ave, approximately 350 feet west of the Property.

Source	Year	Status
		• All Seasons Tire and Auto Center at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	1994	The 1994 aerial photograph is consistent with the 1990 aerial photograph.
City Directory	1995	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • All Seasons Tire and Auto Center at 7960 La Palma Ave, approximately 300 feet west of the Property. • 7942 La Palma Ave no longer has a listing.
Aerial Photograph	2002	The parking lot area in the southeastern portion of the Property is undergoing redevelopment as part of larger improvement activities across the southern and eastern ends of the shopping center. The commercial development across the street to the northeast of the Property is also being redeveloped.
City Directory	2005	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • All Seasons Tire and Auto Center and U-Haul at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2005	The Garden Center building on the Property has been demolished and replaced with a paved parking area; however, the loading dock remains. Several large buildings and associated parking lots have been added in the redeveloped area south of the main shopping center building. Additionally, the building south of the Auto Center building, the structure that at one point may have been dispenser islands, and the building at the northwest corner of the Property have also been demolished. A concrete drainage ditch runs along the southern portion of the Property. The area across the street to the northeast of the Property is now developed with a large building and paved parking area.
City Directory	2005	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Certified Tire BP at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2009	The 2009 aerial photograph is consistent with the 2005 aerial photograph.
City Directory	2010	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Certified Tire BP at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2012	The 2012 aerial photograph is consistent with the 2009 aerial photograph.

Source	Year	Status
Historical Topographic Map	2012	Little information is available in the 2012 topographic map. However, Property features are likely similar to those shown on the 2012 aerial photograph.
City Directory	2014	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Certified Tire BP at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2016	The 2016 aerial photograph is consistent with the 2012 aerial photograph.

A summary of the Property's history, including these records, is provided in Section 6.

5. Records Review

5.1 EDR Radius Map Report

Roux used a computerized environmental database and radius map report prepared by EDR to conduct a government records database search of sites of potential environmental concern within a maximum of a one-mile radius of the Property. Appendix A contains a complete copy of the EDR Radius Map Report with GeoCheck® and a description of the databases. Tables C and D below show the search results for all the pertinent databases that indicated potential environmental concerns.

Table C. EDR Listings for Facilities Within 1 mile of the Property

Database[7]	Target Property	<1/8 mile	1/8 – 1/4 mile	1/4 – 1/2 mile	1/2 – 1 mile	Total
CORRACTS	0	0	0	0	1	1
CA FID UST	0	1	0	NR	NR	1
CERS HAZ WASTE	0	5	5	NR	NR	10
CERS HAZ WASTE	0	1	NR	NR	NR	1
CHMIRS	1	0	NR	NR	NR	1
CIWQS	0	1	NR	NR	NR	1
Cortese	0	0	1	2	NR	3
DRYCLEANERS	0	2	1	NR	NR	3
ECHO	1	3	NR	NR	NR	4
EDR Hist Auto	0	3	NR	NR	NR	3
EDR Hist Cleaner	0	1	NR	NR	NR	1
ENVIROSTOR	0	0	0	1	9	10
FINDS	1	4	NR	NR	NR	5
HAZNET	2	6	NR	NR	NR	8
HIST CORTESE	0	0	1	3	NR	4
HIST UST	0	0	1	NR	NR	1
HWP	0	0	0	0	1	1
HWTS	6	NR	NR	NR	NR	6
LUST	0	0	2	3	NR	5
PFAS	0	0	1	0	NR	1
RCRA NonGen / NLR	0	18	26	NR	NR	44
RCRA-LQG	1	0	0	NR	NR	1
RCRA-SQG	0	1	3	NR	NR	4

7 Descriptions of the EDR databases can be found in the EDR Radius Report (Appendix A).

Database[7]	Target Property	<1/8 mile	1/8 – 1/4 mile	1/4 – 1/2 mile	1/2 – 1 mile	Total
SWEEPS UST	0	1	0	NR	NR	1
UST	1	1	1	NR	NR	3
TOTAL	13	48	42	9	11	123

NR = Database not requested (NR) at the specified radius interval

Based on the EDR listings provided in Table D, only the Property and the offsite facilities that meet the criteria presented below are discussed further in Sections 5.1.1 and 5.1.2.

- Facilities located immediately adjacent to the Property were examined due to their proximity to the Property and the potential for surface water discharges (e.g., stormwater runoff, surface water effluent discharges) to enter the Property or through the migration of groundwater or soil vapor.
- Facilities, within 1/8-mile of the Property, located topographically or hydraulically upgradient of the Property were examined due to their potential environmental impact to the Property through the migration of contaminated surface water, groundwater, and/or soil vapor. As discussed in Section 3.3, groundwater flows predominantly to the southwest in the vicinity of the Property, generally following surface topography; as such, facilities immediately adjacent to the Property or within 1/8-mile to the northeast and east of the Property are discussed herein as having a potential impact on subsurface conditions at the Property.
- For upgradient or adjacent facilities, the review is focused on database listings at off-site facilities that may be indicative of a release that could impact the Property. Facilities with records in databases where listings are only for regular site operations, with no evidence of release, are not by themselves considered to represent potential RECs for the Property (e.g., listings in a database of hazardous waste manifests, or of hazardous materials use). The following databases contain such records. If no release has specifically been reported in another database, then the presence of a facility with listings only in these following databases is assumed not to represent a potential REC for the Property, and listings for those facilities are not included for further review in this Section:
    - FINDS
    - ECHO
    - EMI
    - HAZNET
    - HWTS
    - RCRA-SQG
    - RCRA-LQG
    - CERS
    - CERS HAZ WASTE

As such, facility listings located on the Property, immediately adjacent to the Property, or within 1/8-mile of the Property to the east and northeast are discussed as having a potential impact on subsurface conditions at the Property.

Table D. EDR Listings for Facilities of Potential Environmental Concern Adjacent to or <1/8-Mile of the Property

Database*	Distance and Orientation Relative to the Property	Facility Listing	EDR Address
FINDS, ECHO, RCRA-LQG, UST, HWTS, HAZNET	TP	SEARS BUENA PARK	8150 LA PALMA AVE
CHMIRS	TP	UNTITLED FACILITY	8150 LA PALMA AVE
EDR HIST AUTO	Adjacent, east	KOLL AGENT FOR SUNRISE BP	8308 ON THE MALL
HWTS, HAZNET, CIWQS, CERS	Adjacent, east	BUENA PARK MALL	8308 ON THE MALL
RCRA-SQG, HWTS, RCRA-SQG, FINDS, ECHO, HAZNET	Adjacent, northwest	PHOTO MAKERS UNITECH CO	LA PALMA AND STANTON
EDR HIST AUTO	130 feet west	BLAIR DONALD R	7984 LA PALMA
RCRA NONGEN / NLR	193 feet northeast	KOHL'S INC - STORE #589	8191 LA PALMA AVE
HWTS, RCRA NONGEN / NLR, FINDS, ECHO, HAZNET	200 feet east	KITS CAMERA C24	8289 ON THE MALL UNIT D
RCRA NONGEN / NLR	253 feet north	NAHI ABRAHAM	7958 CAMELLIA DR
CERS HAZ WASTE, CA FID UST, CERS, UST, SWEEPS UST, EDR HIST AUTO, RCRA NONGEN / NLR	260 feet west	ALL SEASON TIRE (FORMERLY CERTIFIED TIRE)	7960 LA PALMA AVE
EDR HIST CLEANER, HWTS, DRYCLEANERS	350 feet west	OLD FASHIONED CLEANERS	7942 LA PALMA
CERS HAZ WASTE, FINDS, ECHO, RCRA NONGEN / NLR, HWTS, HAZNET	350 feet east	BATH & BODY WORKS #1427	8280 ON THE MALL SPC 270
EDR HIST AUTO	390 feet east	KOLL AGENT FOR SUNRISE BP	8308 ON THE MALL

Database*	Distance and Orientation Relative to the Property	Facility Listing	EDR Address
CIWQS	390 feet east	8308 ON THE MALL	8308 ON THE MALL
HWTS, CERS HAZ WASTE, HAZNET, RCRA NONGEN / NLR, FINDS, ECHO	420 feet east	ROSS DRESS FOR LESS #0440	8361 ON THE MALL
RCRA NONGEN / NLR, HWTS, CERS HAZ WASTE, HAZNET	500 feet east	TJ MAXX 1385	8201 ON THE MALL
FINDS, ECHO, RCRA NONGEN / NLR, HWTS, CERS HAZ WASTE, HAZNET	750 feet east	BED BATH & BEYOND #325	8390 ON THE MALL

*Databases are defined in EDR Radius Report (Appendix A)
TP = Target property

Based on the EDR Radius Report, there are EDR database listings for 13 facilities at the Property. The EDR Radius Report also identified 110 offsite facilities with EDR database listings. The relevant EDR database listings for the Property and off-Property facilities are provided in Sections 5.1.1. and 5.1.2.

5.1.1 Property Listings

Sears Buena Park:

ECHO: The facility is listed in the Enforcement and Compliance Online database with no recorded violations. The date of last inspection is shown as March 1, 1993. The facility has an active RCRA registry ID as a small quantity generator.

FINDS: This facility is listed in the EPA's index system; however, no other information is available.

HAZNET: the facility disposed of the following small quantities of hazardous materials:

- 2014 - 2017: Alkaline solution without metals and a pH more than 12.5; detergent waste chemicals; other empty containers of 30 gallons or more; aqueous solution with total organic residues less than 10%; other organic solids; other inorganic solid waste; unspecified oil-containing waste; hydrocarbon solvents; latex waste; unspecified solvent mixture; and asbestos containing waste.
- 2011 – 2013: waste type is not specified in the listings.
- 2006 - 2010: oil/water separation sludge; aqueous solution with total organic residues less than 10%; liquids with halogenated organic compounds more than 1,000 milligrams per liter; other organic solids; off-specification, aged, or surplus organics; unspecified solvent mixture; and hydrocarbon solvents.
- 2004 - 2005: waste oil and mixed oil; oil/water separation sludge; and other organic solids.
- 2002 - 2003: asbestos containing waste; unspecified solvent mixture; other inorganic solid waste.

- 2001: other inorganic solids; and aqueous solution with total organic residues less than 10%.
- 1995 - 1999: asbestos containing waste; aqueous solution with total organic residues less than 10%; and unspecified solvent mixture.
- 1993: unspecified sludge waste; adhesives; paint sludge; other inorganic solid waste; unspecified sludge waste; and contaminated soil from site cleanup.

This listing records a total of 5.4 tons of contaminated soil from a site cleanup off-hauled from the Property in 1993. No other information regarding the contaminated soil was found in this listing.

RCRA-SQG: The facility was listed as a RCRA – small quantity generator of hazardous waste since at least 1996 and was listed as a large quantity generator of hazardous waste between at least 1985 and 1998. As a large quantity generator, the facility received unspecified violations in 1991 and 1993.

UST: The facility has or had a UST registered with Orange County.

Untitled Facility

CHMIRS: The facility has a report in the California Hazardous Material Incident Reporting System from 2003, under Sears Roebuck and Co. The Buena Park Fire Department noted that a substance was released from a battery room, which appeared to have occurred over time, and was discovered during remodeling. An environmental contractor tested the concrete and obtained a positive reading for battery acid. No other relevant information is available from this listing.

5.1.2 Off-Property Listings

Photo Makers Unitech Co at La Palma and Stanton (northwest-adjacent)

RCRA-SQG: This facility was listed as a RCRA – small quantity generator in at least 1988. No violations were noted.

Blair, Donald R at 7984 La Palma Ave (130 feet west)

EDR HIST AUTO: This facility is listed as having been gasoline service station from at least 1969 to 1971.

Kits Camera at 8289 On The Mall Unit D (200 feet east)

ECHO: This facility is listed as inactive in the Enforcement and Compliance Online database with no recorded violations; no other relevant information is available.

FINDS: This facility is listed in the EPA's index system. No waste codes, process information, or report data were available for this listing.

HAZNET: This facility disposed of the following hazardous wastes between 1993 and 1997: photochemicals/photoprocessing waste; other inorganic solid waste; and metal sludge as an alkaline solution.

RCRA – NONGEN / NLR: This facility was listed as a RCRA – non-generator in at least 1998 and a small quantity generator in 1993. No violations were noted.

All Season Tire (formerly Certified Tire) at 7960 La Palma Ave (260 feet west)

CA FID UST: This facility is listed in the Facility Inventory Database, which lists active or inactive UST locations.

EDR HIST AUTO: This facility is listed as having been an auto parts store from at least 1990 to1996 and a gasoline service station in at least 2005 and 2006.

SWEEPS UST: This facility is recorded as having a petroleum UST, with a last act date in 1992.

UST: The facility had a UST registered with Orange County in 1954.

CERS: This facility is listed in CERS as a chemical storage facility. It was recorded as having multiple minor violations, including for improper waste container storage and failure to keep waste manifests on site. The facility was recorded as having a 240-gallon used oil tank, two 55-gallon used antifreeze drum, one waste brake fluid drum, and three used and drained oil filter drums.

EDR HIST AUTO: This facility was listed as an Automotive Parts Shop, General Automotive Repair Shop, and Gasoline Service Station between 1990 and 2006.

Bath & Body Works at 8280 On The Mall (350 feet east)

HAZNET: This facility disposed of small quantities of off-specification, aged, or surplus organics in 2017.

CERS HAZ WASTE: This facility was listed as a hazardous waste generator. No violations were reported.

FINDS, ECHO: This facility is listed in the FINDS and ECHO databases as a miscellaneous store retailer. No violations were reported.

Old Fashioned Cleaners at 7942 La Palma Ave (350 feet west)

DRYCLEANERS: This facility had a dry-cleaning equipment permit to use perchloroethylene (PCE).

EDR HIST CLEANER: This facility is listed as having been a dry-cleaning plant from at least 1977 to 1994.

HWTS: This facility was inactive in HWTS as of 1995.

Buena Park Mall at 8308 On The Mall (390 feet east)

HAZNET: This facility disposed of 4.214 tons of asbestos containing waste in 1998.

Koll Agent For Sunrise BP at 8308 On The Mall (390 feet east)

EDR HIST AUTO: This facility is listed as having been a gasoline service station from at least 1996 to 1997.

8308 On The Mall at 8308 On The Mall (390 feet east)

CIWQS: This facility is listed in the California Integrated Water Quality System for a storm water construction project that happened at some point between 1997 and 2001.

Buena Park Mall at 8282 On The Mall (420 feet east)

HAZNET: This facility disposed of 4.214 tons of asbestos containing waste in 1998.

Ross Dress For Less at 8361 On The Mall (420 feet east)

FINDS: This facility is listed in the EPA's index system as a Family Clothing Store. No waste codes or process information were listed for the facility.

HAZNET: This facility disposed of the following hazardous waste between 2015 and 2017: off-specification, aged, or surplus organics; and alkaline solution without metals and a pH of more than 12.5.

HWTS: This facility has an active listing in HWTS as of 2020.

CERS HAZ WASTE: This facility was listed as a hazardous waste generator.

Bed Bath & Beyond at 8390 On The Mall (750 feet east)

FINDS, ECHO: This facility is listed in the EPA's index systems as a Miscellaneous Home Furnishing Store. No waste codes or process information were listed for the facility.

HAZNET: This facility disposed of the following hazardous waste from 2014 to 2017: unspecified solvent mixture; other inorganic solid waste; off-specification, aged, or surplus organics; alkaline solution without metals and a pH of more than 12.5; and liquids with a pH of less than 2. Types of hazardous waste disposed of in 2012 and 2013 were not described.

Of these listings, none indicate a potential release. The historic dry-cleaning facility at 7942 La Palma Avenue and automotive facility at All Season Tire could be considered facilities of interest based on the likelihood of historic releases; however, these facilities are located hydraulically downgradient of the Property and are therefore not considered facilities of interest for this Phase I ESA.

5.2 FOIA/Public Records Request Responses

FOIA/Public Records Act requests for the Property were submitted to federal, state, and local regulatory agencies and the requests and responses are summarized in Table F below.

A summary of the FOIA/Public Records Act responses that may pose an environmental concern to the Property is provided in Section 6.

Table F. Regulatory Agencies Contacted and Responses

Agency	Status
South Coast Air Quality Management District	• Records were requested on November 9, 2021. Response was received on November 16, 2021 with records for the Property.
City of Buena Park	• Records were requested on November 8, 2021. Response was received on November 15 and 18, 2021 with records for the Property.
Orange County Public Works Department	• Records were requested on November 9, 2021. Response was received on November 15, 2021 stating that no records were available for the Property.

Agency	Status
Orange County Sanitation Department	• Records were requested on November 9, 2021. Response was received on November 12, 2021 stating that no records were available for the Property.
Orange County Health Care Agency Environmental Health Division	• Records were requested on November 9, 2021. Response was received on November 18, 2021 with records for the Property.
Department of Toxic Substances Control (DTSC), including online Envirostor and Hazardous Waste Tracking System (HWTS)	• Records were requested on November 9, 2021. Response was received on November 10, 2021 stating that no records were available for the Property.
Santa Ana Regional Water Quality Control Board (SARWQCB) online GeoTracker files	• Records were requested on November 9, 2021. Response was received from SARWQCB on November 12, 2021 stating that no records were available for the Property.
CalEPA Regulated Site Portal	• The CalEPA Regulated Site Portal was queried on November 10, 2021. Available records are summarized in Section 5.2.
CalGEM GIS WellFinder	• The CalGEM GIS WellFinder was queried on November 10, 2021. No wells were found in the vicinity of the Property.
GAMA Groundwater Information System	• The GAMA Groundwater Information System was queried on November 10, 2021. Five monitoring wells were found within an approximate 0.25-mile radius of the Property.

Information obtained from all agency correspondence and their associated online databases is included in Appendix F and is summarized below.

South Coast Air Quality Management District

Records were requested on November 9, 2021. A response was received on November 16, 2021 with the following records:

- Permits to operate the following:
  - Four automatic paint and solvent spray booths in 1949 (likely an erroneous date) and 1959 (currently inactive); and
  - Three dichlorodifluoromethane (CFC-12) recovery/recycling operations for motor vehicle air conditioning systems in 1992 that are currently inactive.
- A notice of violation (NOV) was given to the facility in 1989 for failure to submit a Transportation Plan.
- Notification Reports indicate that in 2003, an environmental company removed a total of 8,177 square feet of Class I asbestos-containing materials in the garden/auto shop areas during renovation activities.

City of Buena Park

Building Division:

Permits between 1959 and the early 2000s describe general construction activities such as developing a flower concession store, beauty salon store, setting up a Christmas tree lot, a carnival, various building alterations, and include permits for heating, ventilation, refrigeration & air conditioning and plumbing records. Stormwater NPDES certifications were also included for several of the permits issued after 2010. and Noted records include the following:

- In 1958, a building permit was issued to Sears Roebuck for the Property. Other permits, such as for plumbing and electrical, are also available from this time.
- In 1958, a building permit was issued for a service station.
- A 1965 Certificate of Occupancy was issued for automotive service on the Property.
- A figure with an unknown date indicates there was a fuel dispenser island with four pumps directly west of the Auto Center building at some point (Figure 2).
- In 1974, a building permit was issued for two raised dispenser islands.
- A 1974 figure indicates the presence of three 10,000-gallon USTs with unknown contents.
- In 1984, permits and inspection reports indicate that during interior and exterior improvements, an escalator was installed.
- In 1986, a building permit was issued for an above-ground storage tank (AST) for waste oil inside the auto repair shop.
- A 1992 waste and vent diagram is provided.

Code Enforcement Division:

- Code enforcement inspections between 2001 and 2019 show code violations unrelated to potential environmental issues such as light poles missing electrical panels, structures needing maintenance, trucks and motorhomes using the parking lot for overnight storage, and lights glaring into residential properties.
- In 2003, a Staff Report for the Planning Commission indicates that the Auto Center building was planned for redevelopment and the Garden Center building, and a former Great Western Bank building were planned to be demolished and converted to parking, along with reconfiguration of the parking spaces and landscaping adjacent to the Auto Center building.

Planning Division:

- In 1956, a resolution approval indicates that the Property was approved to be rezoned from single-family residential to a central business zone.
- A 1959 figure shows underground utilities at the Property from this time.
- In 1961, a resolution approval indicates that a canopy was added to an existing service station at the east side of Stanton Avenue, approximately 812 feet south of La Palma Avenue.
- In 1964, a resolution approval indicates that an automotive center building was approved, which likely refers to the additional building south of the current Auto Center building.
- In 1964, a resolution approval indicates that a canopy was erected over an open sales area at the Garden Center. If this sales area was located directly east of the building, it could explain the possible building in that area observed in the 1972 and 1977 aerial photographs.
- In 1974, a resolution approval indicates that the building at the northeast corner of the Property was originally for Citizens Savings & Loan.

- In 1980, a resolution approval indicates that the existing automotive fuel center was relocated and reconstructed. The exact location of this relocation is not identified but was likely still within the vicinity of the Auto Center building.
- In 1980, a resolution approval indicates that the building at the northeast corner of the Property became occupied by Great Western Savings and Loan.
- In 1984, a resolution approval indicates that exterior modifications were made to the Auto Center building including the following:
    - The document describes former gasoline dispending islands on the west side of the building, on which planters were currently located; the resolution states that the dispensing islands and planters both need to be removed.
    - The resolution states that "gasoline tanks" would need to be removed to the satisfaction of the Fire Department. This is likely referring to the former USTs in front of the Auto Center building.
- Additional exterior building modifications were approved for the Auto Center building in 1998 and 2003. Neither document describes dispenser islands or USTs.

Additional resolution approvals between 1956 and 2003 describe a key shop, landscaping, signage, beer and wine sales, and general expansions, modifications, and remodeling

Public Works

One document was included in Public Works records, an NPDES listing for the Christmas tree lot on the Property, Tree Kings. No violations were reported, and the permit was removed in 2014.

Orange County Health Care Agency Environmental Health Division

Records were requested on November 8, 2021. A response received on November 18, 2019 with the following documents:

- Inspection reports from 2009 to 2020 for hazardous waste with a minor violation related to failure to keep waste documentation on site, which was rectified in 2019.
- Inspection reports between 2010 and 2020 indicate the following hazardous wastes: brake fluid, clarifier sludge, aqueous brake parts cleaner, waste oil, absorbent, spent radiator coolant, spent lead/acid batteries, used oil filters, returned/damage flammable products, aerosols, paint debris, water base paint, and fluorescent lights.
- A 2016 inspection report indicates the following petroleum products stored in the auto repair shop:
    - A 500-gallon waste oil tank;
    - A 55-gallon waste oil drum;
    - Five new oil drums between 150 and 300 gallons;
    - A 110-gallon synthetic oil tank; and
    - A 55-gallon automatic transmission fluid tank.
- A 2020 Aboveground Petroleum Storage Tank Inspection Report indicated the following petroleum products stored in the auto repair shop:
    - A 500-gallon used oil tank;
    - Three motor oil tanks (capacity 750 gallons, 500 gallons, and 220 gallons); and
    - A 100-gallon automatic transmission fluid tank.
- A 2021 Hazardous Materials and Wastes Inventory Matrix Report indicates the following petroleum products stored in the auto repair shop:

- A 350-gallon waste oil tank;
- A 500-gallon motor oil tank;
- A 300-gallon storage container for used oil filters;
- A 55-gallon drum storing ethylene glycol
- A 30-gallon drum storing waste brake fluid; and
- A 300-gallon storage container for waste absorbent material

- California Environmental Reporting System (CERS) listings from 2018 to 2021 indicate that the facility had the following hazardous material inventory at this time:
  - ASTs with new motor oil, used motor oil, used motor oil filters, new antifreeze, and used antifreeze;
  - Used lead acid batteries, floor degreaser, new transmission fluid, and diesel fuel; and
  - Propane, waste propane, waste flammable liquids, waste oxidizers, waste toxics, waste aerosols, and floor stripper.

Santa Ana Regional Water Quality Control Board (SARWQCB) online GeoTracker files

Records were requested on November 9, 2021. Response was received from SARWQCB on November 12, 2021 stating that no records were available for the Property. Roux queried RWQCB's online GeoTracker® database on November 10, 2021 and identified one listing in the vicinity of the Property, a closed LUST case located at the J.C. Penney department store approximately 820 feet upgradient. This LUST case regarded a diesel spill that was discovered in 1996 upon closure of a corroded storage tank (unspecified whether AST or UST). The case was closed in June 1997, and no further information is available on GeoTracker. Due to the distance of this site from the Property and the length of time for which the case has been closed, this closed LUST case is not regarded as an environmental concern for this Phase I ESA.

Department of Toxic Substances Control (DTSC), including online Envirostor and Hazardous Waste Tracking System (HWTS)

Records were requested on November 9, 2021. A response was received on November 10, 2021 stating that no records were available for the Property. Additionally, online databases, Envirostor and HWTS, were queried on November 10, 2021. No listings were available in the vicinity of the Property on Envirostor; however, two EPA listings were identified for the Property on HWTS, including a 2003 ID for Sunrise Buena Park that is currently inactive and a 1987 ID for Sears that is currently inactive.

CalEPA Regulated Site Portal

The CalEPA Regulated Site Portal was queried on November 9, 2021. 19 regulated sites were found in the vicinity of the Property, primarily within the adjacent shopping center buildings, including Dollar Tree, Michael's, Carl's Jr, and Walmart. Minor violations were noted for several of these sites, including for improper storage of hazardous waste or lack of documentation, but no indications of a potential release. Michael's was noted as storing 10-gallon containers of consumer/universal waste. Walmart was recorded as having several aboveground storage tanks containing petroleum, including an 800-gallon used oil tank, a 300-gallon used oil tank, and two 400-gallon new oil tanks. All tanks at this site were observed as being secondarily contained as of the latest inspection in 2019, and no evidence of a potential release was noted.

CalGEM GIS WellFinder (formerly DOGGR)

- The CalGEM GIS WellFinder database was queried on November 10, 2021. No oil and gas wells were found in the vicinity of the Property.

GAMA Groundwater Information System

- The GAMA Groundwater Information System was queried on November 10, 2021. Five monitoring wells were found within an approximately 0.25-mile radius of the Property, all in a relatively cross-gradient direction.

In summary, the Property was first developed between 1958 and 1959. A 1958 building permit for a "service station" indicates that USTs and fuel dispensers may have existed since the Auto Center building was developed, around 1959. Additionally, a 1974 figure from City of Buena Park records indicates the presence of three 10,000-gallon USTs in front of the Auto Center building at this time. City of Buena Park Building department records also indicate that there was a fuel dispenser island with four pumps directly west of the Auto Center building which was modified in 1974. None of the public records received included any documentation related to the removal events of the former USTs or fuel dispenser islands. USTs and dispenser islands store petroleum products and have the potential to release large quantities of these products to subsurface soil and groundwater with a risk of volatilization into soil vapor. Therefore, the former presence of USTs and dispenser islands without conclusive documentation that no releases occurred is considered a REC for the Property.

In 1964, an automotive service station had been developed, which likely refers to the former building south of the Auto Center building. In 1986, a building permit was issued for what is likely the current waste oil AST system in the Auto Center building. The Auto Center also had four paint and solvent spray booths in at least 1959 and three CFC-12 recovery/recycling operations for motor vehicle air conditioning systems in at least 1992. During the 2003 redevelopment activities a total of 8,177 square feet of Class I asbestos-containing materials were removed from the Garden Center building, and asbestos was later identified in numerous materials throughout the buildings on the Property. However, assessment of asbestos-containing materials is out of the scope of this Phase I ESA.

The Property received SCAQMD and City of Buena Park Code Enforcement violations, although none reviewed during this Phase I ESA are indicative of a potential release. No violations with the Orange County Health Care Agency Environmental Health Division were identified during this Phase I ESA.

5.3 User-Provided Documents

The following documents were provided by the User (Appendix G).

- 1988 *Compaction Report for Gasoline Storage Tank Backfill Area:*[8] According to this report, six gasoline USTs were removed and backfilled with silty sand. The report indicated that the excavated USTs were located directly north of the auto repair shop, on the west side of the shop.
- 1986-1989 Subcontractor Invoices and Contracts:
    - A 1989 invoice from Jerry's Backhoe Service indicates that the UST excavation pit was 1,455 square feet.

[8] Geo-Etka, Inc. 1988. *Compaction Report for Gasoline Storage Tank Backfill Area, 8150 La Palma Avenue.* October 18.

- A 1988 invoice from Petroleum Industry Consultants, Inc. indicates that six soil samples were collected and analyzed during the UST excavation. Results from these analyses were not provided with this documentation.
- A 1988 invoice from Hank's Service Station Maintenance indicates that a waste oil AST system and piping were installed in 1988.
- A 1986 contract and invoices from 1988 and 1989 between Sears and Hank's Service Station Maintenance were provided for the removal of seven underground petroleum storage tanks.
- A 1988 invoice from G.V. Adams Environmental Services indicates that the seven underground storage tanks were removed.

- 2012 *Asbestos Inspection Survey Report:*[9] According to this report, a building survey for asbestos-containing materials, limited to the sampling of existing flooring materials, was conducted to update previous asbestos inspection data from 1997. Friable asbestos was identified in numerous materials throughout the buildings. The report indicates that asbestos-containing materials were also identified during the 1997 survey and that asbestos-containing materials had been previously removed from pipe insulation from the retail sales floor in 1999, pipe fittings from the retail sales floor in 2002, and a pipe fitting in the mechanical room in 2003.The report also states that the store opened in 1959. However, assessment of asbestos-containing materials is out of the scope of this Phase I ESA.
- *2019 Roux Associates Phase I and Focused Phase II Environmental Site Assessment:* In Roux Associates' 2019 Phase I investigation, three RECs were identified – the former on-Property dry-cleaning facility, the current on-Property auto repair facility, and the former USTs and dispenser islands that were present in front of the auto center building between 1959 and 1988. A Focused Phase II was conducted to assess potential VOC impacts due to these RECs, which consisted of soil and soil vapor sampling. A total of six borings were advanced to 5.5 to 15.5 feet in the vicinity of the former USTs, the basement of the current Auto Center building, and the basement of Sears in the potential historic dry cleaner location. The only exceedance was for TPH, detected at the boring in the basement of the Auto Center. Roux found that TPH was detected in this location at a maximum concentration of 93,000 µg/m^3, above the commercial environmental screening limit (ESL) of 83,000 µg/m^3 and above the residential ESL of 20,000 µg/m^3. All other TPH results were below the laboratory reporting limit of 50,000 µg/m^3, however, this reporting limit is higher than the residential ESL. Similarly, no exceedances were detected for the three borings advanced in the assumed location of the former on-Property dry cleaners, however, the laboratory detection limit of 100 µg/m^3 was above the residential cancer risk ESLs of 15 µg/m^3 for PCE and 16 ug/m^3 for TCE.

5.3.1 User-Provided Documents Summary

The Property was first commercially developed between 1958 and 1959. A 1958 building permit for a "service station" indicates that USTs and fuel dispensers may have existed since the Auto Center building was developed, around 1959. Additionally, a 1974 figure from City of Buena Park records indicates the presence of three 10,000-gallon USTs in front of the Auto Center building at this time. City of Buena Park Building department records also indicate that there was a fuel dispenser island with four pumps directly west of the Auto Center building which was modified in 1974. None of the public records received included any documentation related to the removal events of the former USTs or fuel dispenser islands.

In 1964, an automotive service station had been developed, which likely refers to the former building south of the Auto Center building. In 1986, a building permit was issued for what is likely the current waste oil AST system in the Auto Center building. The Auto Center also had four paint and solvent spray booths in at least 1959 and three CFC-12 recovery/recycling operations for motor vehicle air conditioning systems in at least 1992In its 2019 Phase I ESA, Roux Associates identified this former presence of USTs and dispenser islands

[9] RGA Environmental, 2012. *Asbestos Inspection Survey Report, Sears Retail Store (#1268) & Sears Auto Center (#6731).* July 12.

at the Auto Center building/former service station as a REC, and conducted soil and soil vapor sampling in this area to assess the associated risk. TPH was detected at a maximum concentration of 93,000 µg/m^3 in the vicinity of the former automobile service station, above the commercial ESL of 83,000 µg/m^3. All other TPH results were below the laboratory reporting limit of 50,000 µg/m^3. However, because the Property may be redeveloped for residential purposes in the future, the residential ESL of 20,000 µg/m^3 must be considered. The maximum TPH concentration detected in Roux's 2019 Phase II is above this residential ESL, and because the laboratory reporting limit was also above this ESL, it is unknown if TPH concentrations at other boring locations exceed the residential limit. Therefore, these 2019 sampling results at the Auto Center represent a REC for the Property.

Roux Associates also identified the historical on-Property dry cleaners as a REC, and advanced three soil borings in its assumed former location during its Phase II investigation. No exceedances were detected for these samples, however, the laboratory detection limit of 100 µg/m^3 was above the residential cancer risk ESLs of 15 µg/m^3 for PCE and 16 ug/m^3 for TCE. A potential historic release could have caused elevated levels of CVOCs in the location of this facility that these 2019 samples would not have detected, and it was unknown if the residential cancer risk value was exceeded. Therefore, these 2019 sampling results at the former on-Property dry cleaners represented a potential concern for the Property. Roux Associates conducted additional investigation at this former on-Property dry cleaner in order to address this potential concern, detailed further in Section 8.

6. Property History Summary

The Property has been bounded by roads to the north and west (present-day La Palma and Stanton Avenues) since at least 1896. The Property was formerly used for agriculture, specifically orchards, beginning in at least 1928. Within the orchards, a small building was located in the northeast portion of the Property between at least 1938 and 1942. By 1959, the orchards were removed, and the Property was developed with the current Sears Department Store building and Auto Center building.

Historically, the Property also included a second auto center building directly south of the current Auto Center building between approximately 1989 and 2002. A dispenser island with four pumps existed to the west of the northern Auto Center building between at least 1962 and 2002, which was modified from four to two islands in 1974. By 2005, the second auto center building and the dispenser islands, as well as several other small buildings on the Property, were demolished and replaced with paved parking areas.

A 1958 building permit for a “service station” indicates that these USTs and fuel dispensers may have existed since the Auto Center building was developed, around 1959. USA Petroleum, a possible service station, is listed as a tenant for the Property in 1980. Additionally, a 1974 figure from City of Buena Park records indicated the presence of three 10,000-gallon underground petroleum storage tanks in front of the Auto Center building at the time. In 1988, seven gasoline USTs were removed from directly north of the Auto Center and six soil samples were collected from the excavation pit. No other information regarding the former USTs was identified during this Phase I ESA, and analytical results for the soil samples were not reported. By 2005, the dispenser islands, which appear to have existed in some form since at least 1962, were removed, and no information regarding their removal was identified during this Phase I ESA.

In 1985, a Sears dry-cleaning facility is listed in the city directory for the Property. Dry-cleaning facilities historically handled large volumes of chlorinated solvents with the potential for releases into subsurface soil and groundwater with a risk of volatilization into soil vapor. Roux Associates identified this facility as a REC in its 2019 Phase I ESA, and advanced three soil borings at this location as part of its Focused Phase II. A soil vapor sample was collected at each boring. No exceedances were detected, but the laboratory detection limits for PCE and TCE were higher than the residential cancer risk environmental screening levels, so it was unknown if the residential cancer risk value was exceeded. Therefore, these 2019 sampling results at the former on-Property dry cleaners represented a potential concern for the Property. Roux Associates conducted additional investigation at this former on-Property dry cleaner in order to address this potential concern , detailed further in Section 8.

In 1988, a 500-gallon waste oil AST system and piping were installed at the Auto Center. The Auto Center also had four paint and solvent spray booths in at least 1959 and three dichlorodifluoromethane (CFC-12) recovery/recycling operations for motor vehicle air conditioning systems in at least 1992. The Property has disposed of small quantities of hazardous waste since at least 1985. In 1993, 5.4 tons of contaminated soil from an unspecified site cleanup were off-hauled from the Property. No other information regarding the nature of the cleanup was identified during this Phase I ESA, which is considered a data gap.

Additionally, during redevelopment activities in 2003, battery acid releases from a battery room were discovered and appeared to have been leaking for some time. The location of the battery room and further details of this incident were not identified during this Phase I ESA. The lack of further information regarding a cleanup of the battery leak is considered a data gap as well as a business environmental risk for the Property.

7. Property Reconnaissance

Roux conducted a reconnaissance of the Property on November 16, 2021. Roux was accompanied by the Property Manager, Annette Gens. The objective of the reconnaissance was to check for visual evidence of past/present use or storage of hazardous materials that could potentially affect the soil, groundwater, soil vapor, or surface water quality at the Property. Photographs taken during reconnaissance are provided in Appendix H and described below.

The Property consists of approximately 25 acres and is currently improved with a 227,503 square-foot vacant Sears Department Store building, detached House of Imports Service Center building, and paved parking areas. (Appendix H, Photographs 1 through 32).

At the time of Property reconnaissance, the Property consisted of the following:

- A vacant Sears Department Store building (Appendix H, Photographs 1-13) which was connected along the eastern border of the Property to Buena Park Downtown Mall. The loading dock was occupied by a truck storage lot (Appendix H, Photograph 32).
- A House of Imports Service Center, (Appendix H, Photographs 14-29) which was located in the western portion of the Property (note that this building was formerly used as an automobile repair facility); and
- Associated parking areas (Appendix H, Photographs 30-32).

A portion of the Property parking area was used by Tesla to store vehicles (Appendix H, Photograph 31) and used as storage for an inactive haunted house (Appendix H, Photograph 30).

The Auto Shop building operates an oil water separator (OWS), above-ground hydraulic lifts with lift cylinders that extend into the basement level, and compressors.. During the reconnaissance, staining was observed in the basement of the Auto Shop building beneath the hydraulic lifts and associated hydraulic fluid tanks.

7.1 Utilities

Southern California Edison provides the electricity, Southern California Gas Company provides the natural gas, and the City of Buena Park provides the water for the Property.

7.2 Hazardous Substances

Air conditioning and cooling tower chemicals (containers ranging from approximately 20 to 55 gallons in capacity) were observed in the air conditioning equipment room of the main vacant Sears department basement including refrigerant and water softener (Appendix H, Photograph 10). No signs of staining, damaged equipment, or drains were observed in the vicinity of the chemicals. Staining near or towards floor drains was observed coming from the air conditioning equipment (Appendix H, Photograph 6-7). The air conditioner was shut off on November 16, 2021 due to lack of occupants in the vacated Sears building.

One compressor was observed in the air conditioning equipment room in the Sears Department Store basement (Appendix H, Photograph 9). No significant signs of a release such as staining, or floor drains were observed in the area around the compressor.

The Sears Department Store building was equipped with three elevators: one passenger elevator and two freight elevators (Appendix H, Photographs 11-13). The elevators have not been in-use since Sears vacated the property in February 2020. One freight elevator is operational, and one is currently out-of-service. No issues with leaking hydraulic fluid was reported by onsite Sears personnel. The installation date of the elevators is unknown, onsite personnel reported that all three elevators may have been installed in the 1980s. No signs of significant staining were noted in the vicinity of the equipment for the elevators. Hydraulic oil used in elevators and similar applications prior to 1979 was sometimes found to contain PCBs and/or TPH Based on the installation date of the elevators and the age of the Property buildings, hydraulic oils containing PCBs and/or TPH may have been used in the equipment, therefore the on-site elevator equipment represents a *de minimis* condition.

One out-of-commission compressor was located in a shed located on the roof of the vacant Sears Department Store building. No sign of significant staining was observed in the vicinity of the compressor.

The following hazardous substances were observed within the House of Imports Service Center building which is an auto repair shop:

Hazardous Substance	Approximate Container Size	Number of Containers	Location	Secondary Containment
New Motor Oil	500 Gallons	1	House of Imports Service Center	Yes
New Motor Oil	350 Gallons	1	House of Imports Service Center	Yes
New Motor Oil	55 Gallons	5	House of Imports Service Center	No
Mobile Waste Oil Collection Units	30 Gallons	7	House of Imports Service Center	No
Oily Waste Can	5 Gallons	1	House of Imports Service Center	No
Hazardous Waste – Light Bulbs	5 Gallons	1	House of Imports Service Center	No
Hazardous Waste – Batteries	5 Gallons	1	House of Imports Service Center	No
Sorbent Waste	55 Gallons	2	Outside of House of Imports Service Center	No
Used Break Fluid	55 Gallons	1	Outside of House of Imports Service Center	No

Hazardous Substance	Approximate Container Size	Number of Containers	Location	Secondary Containment
Motor Oil	55 Gallons	1	Outside of House of Imports Service Center	Yes
Break Cleaner	55 Gallons	1	Outside of House of Imports Service Center	No
Paper Filters	55 Gallons	2	Outside of House of Imports Service Center	No
Metal Filters	55 Gallons	2	Outside of House of Imports Service Center	No
Compressed Gas Tanks - Empty	30 Gallons	12	Basement of House of Imports Service Center	No

In addition to the materials listed above, numerous unopened small containers (up to one gallon) were observed in Auto Center building including new oil, power steering fluid, battery cleaner, engine cleaning detergent, and coolant/antifreeze (Appendix H, Photographs 14-16). Near the outdoor drum storage area, several empty one-quart bottles of synthetic motor oil were piled next to the drums (Appendix H, Photograph 26). Significant areas of staining were observed throughout the House of Imports Service Center building and surrounding both drum storage areas.

One compressor was observed on the ground level of the House of Imports Service Center building. The area around the equipment had significant indications of staining. Evidence of an oil water separator (OWS) was located near the northwestern corner of the basement; however, drains appear to have been sealed and the OWS was not operational. The OWS has three chambers. No documents were available onsite pertaining to the most recent time that the clarifier was cleaned out.

Two compressors were observed in the House of Imports Service Center basement. Signs of staining were observed around the base of the compressors (Appendix H, Photograph 28).

Equipment from approximately eighteen (18) below-ground hydraulic lifts was observed in the basement of House of Imports Service Center building (Appendix H, Photographs 22-25). Only approximate four lifts appeared to be operational. The hydraulic lifts extend into the basement of House of Imports Service Center building; however, they did not appear to extend into the ground below the basement. Hydraulic fluid storage tanks for each of the approximately 18 lifts were observed in the basement with piping extending to the basement ceiling to provide fluid to the lifts. Several of the tanks piping appeared to be disconnected and no longer in use. Staining was observed around the base of several of the hydraulic fluid containers as well as around the base of several of the lifts (Appendix H, Photographs 22-25). House of Imports Service Center personnel were unaware of the installation date of the hydraulic lifts. Observations on the ground-level indicate that only approximately four below-ground lifts were operational at the time of Property reconnaissance. Several above-ground lifts were also observed to be operational. Onsite personnel had no knowledge of when the remaining below-ground hydraulic lifts were removed from the Property. As noted

above, hydraulic oil used in lifts and similar applications prior to 1979 was sometimes found to contain PCBs and/or TPH.

New and waste automotive batteries were observed in the House of Imports Service Center building, on the ground level. No signs of significant staining or corrosion were observed in the vicinity of the automotive batteries.

Several containers of commercial janitorial cleaning chemicals (up to five gallon in size) were observed in the House of Imports Service Center building. No sign of significant staining was observed in the vicinity of the cleaning chemicals.

7.3 Polychlorinated Biphenyls

Roux observed several floor- and pad-mounted transformers in the Vacant Department Store building, primarily in the basement. These interior transformers appear to be dry-type transformers. The interior transformers were observed to be in generally good condition with no visual staining observed in the vicinity.

The hydraulic elevators are located in the Department Store building. Below-ground hydraulic lifts are present in the Auto Center building.

7.4 Staining and Stressed Vegetation

Small areas of staining were observed throughout the parking areas of the Property. The staining appears to be from leaking parked vehicles and is likely surficial in nature. Based on the small size and the apparent surficial nature of the staining, it is not expected to represent a significant environmental impact.

7.5 Drains and Sumps

Drains located in the loading area south of the main vacant Sears Department Store building are equipped with two sump pumps. The sump pumps are reportedly currently out-of-service. No hazardous materials were observed in the area.

The main Sears Department Store structure was equipped with a septic sump/tank for domestic waste (Appendix H, Photograph 8). Equipment for the sump was observed in the maintenance area of the basement. A mild sewage odor was observed in the area of the septic equipment. No hazardous materials or staining were observed in the immediate vicinity of the equipment.

7.6 Solid Waste

No dumpsters were found on the Property other than the refuse containers. A pile of empty synthetic motor oil containers were piled behind the House of Imports Service Center.

No hazardous materials or signs of illegal dumping were observed in these areas.

7.7 Wastewater

Refer to Section 6.2 and 6.5 above for discussion of wastewater discharge systems.

7.8 Wells

No oil/gas wells or groundwater monitoring wells were observed on the Property during reconnaissance.

7.9 Other

No data gaps were identified during the Property reconnaissance.

8. Limited Phase II ESA

Per the 1985 City Directory, a Sears dry-cleaning facility was suspected to exist on the Property at that time. However, the exact location of the former dry-cleaning facility within the Sears retail building is unknown and no additional documentation for the dry-cleaning facility was identified through the document review process.

To address the environmental concern presented by this former on-Property dry cleaners, Roux conducted a limited Phase II investigation in December 2021. This limited Phase II investigation consisted of the installation and sampling of three soil vapor probes at 5 feet below ground surface. This section summarizes the December 2021 soil vapor sampling event and findings. The scope of work was developed to assess concentrations of volatile organic compounds (VOCs) in soil vapor underneath the former Sears department store.

Soil vapor sampling was conducted in general accordance with the July 2015 California Environmental Protection Agency (CalEPA), Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board, the San Francisco Regional Water Quality Control Board Active Soil Gas Investigations Advisory and the February 2020 CalEPA, DTSC, California Water Resources Control Boards Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (Draft Supplemental Guidance).

The following sections summarize the investigation methods that were used during the sampling event, including pre-field activities, sampling locations and procedures, and field observations.

8.1 Pre-Field Activities

All fieldwork associated with the investigation was performed in accordance with the Site-specific Health and Safety Plan (HASP). The HASP identified the potential physical and chemical hazards at the Site that could present a threat to workers and other Site users while performing the work. Field workers acknowledged their familiarity with all safety procedures and indicated their intent to follow the HASP by signing the HASP after the tailgate safety meeting, which took place at the beginning of each field day. The field work was completed without health and safety incidents of any kind.

8.2 Sub-Surface Utility Clearance

Roux marked the Site with white paint and notified Underground Service Alert (USA) of Southern California, for a DigAlert Ticket (B213420756-00B). Notification was given to USA at least two business days in advance of intrusive subsurface work to identify potentially buried utility lines (e.g., natural gas, electric, water, sewer, telephone, fiber optic, etc.) situated within the bounds of the Site. Roux also contracted with Ground Penetrating Radar Systems, LLC (GPRS) of Los Angeles, California to perform a private geophysical investigation within the former Sears department store to locate potentially buried utility lines or other subsurface features. On December 14, 2021, GPRS cleared the proposed locations prior to intrusive work.

8.3 Soil Vapor Probe Installation

On December 14, 2021, Cascade Drilling of Santa Ana, California (C-57 License #1069034), under the direction of Roux, advanced three soil borings at the Site (SV2021-1 through SV2021-3) and installed temporary soil vapor probes at five feet below ground surface in each boring. All borings were advanced using a hand auger and soil was logged continuously in a manner consistent with the Unified Soil

Classification System for materials, color, moisture and other pertinent geological observations. Boring logs are provided in Appendix I. Drilling equipment was cleaned in a solution of laboratory-grade detergent and rinsed with distilled water between boring locations.

8.4 Soil Vapor Sampling

Roux sampled the three soil vapor probes on December 20, 2021, after more than 48 hours of equilibration time. Prior to purging or sampling, a minimum 60-second shut-in test at a vacuum of 100 inches of water was performed at each probe to confirm that the above-ground lines and valves were properly sealed. Upon successful completion of the shut-in test, three purge volumes of stagnant air were subsequently extracted from the sampling system with a Gil Air Gillian 5000 air pump at a flow rate of 200 milliliters per minute (mL/min). Roux used batch certified, 1-liter SUMMA® canisters equipped with 200 mL/min flow controllers to collect the soil vapor samples, which were transported under proper chain of custody to Enthalpy Analytical in Orange, California for VOC analysis by United States Environmental Protection Agency (USEPA) Test Method TO-15. During purging and sampling, 1,1-difluoroethane was used as a gaseous leak check compound (LCC). The LCC was applied adjacent to the soil vapor probe and sample train connections for detection of potential leaks in the sampling system. Soil vapor probes were subsequently abandoned, and the boreholes were backfilled with hydrated bentonite and sealed at the surface with concrete, flush with the building slab.

8.5 Soil Vapor Sampling Results

The soil vapor sampling results are summarized in Table 1. The laboratory report is provided in Appendix J. Soil vapor screening levels (SLs) were calculated per the Draft Supplemental Guidance, applying an attenuation factor of 0.03 to the DTSC Human and Ecological Risk Office Human Health Risk Assessment Note 3 SLs for Commercial/ Industrial and Residential Air, dated June 2020.

No VOCs were detected at concentrations exceeding the SLs for Commercial/ Industrial or Residential Air. Reporting limits were below the DTSC Commercial/ Industrial and Residential SLs for all compounds.

8.6 Soil Vapor Sampling Conclusions and Recommendations

Concentrations of VOCs detected in soil vapor at all three sampling locations underneath the former Sears department store were less than the DTSC Commercial/ Industrial or Residential SLs. The results of this limited Phase II ESA resolve the potential concern related to the suspected former dry cleaning facility. No additional sampling is recommended.

9. Phase I And Limited Phase II Conclusions

Roux performed a Phase I ESA for the Property on behalf of the User. The Property comprises approximately 25 acres in Buena Park, California and is currently improved with a 227,503 square-foot one-story Sears Department Store building, detached 13,360 square-foot one-story Auto Center building that is currently operational, and paved parking areas. The surrounding area is mixed residential and commercial.

This Phase I ESA was performed in general accordance with ASTM Standard Practice E1527-13 on behalf of MGP XII Buena Park Center, LLC (MGP, User), and was performed to identify Recognized Environmental Conditions (RECs), controlled RECs (CRECs), and/or historical RECs (HRECs) at the Property, indicating past, current, or material threats of the release of hazardous materials or petroleum hydrocarbons to the Property's soil, groundwater, soil vapor, or surface water. This Phase I ESA was conducted by investigating past Property uses, reviewing the results of a search of environmental databases, reviewing records at relevant government agencies, and performing a reconnaissance of the Property and surrounding area.

The Property was formerly used for agriculture, specifically orchards, beginning in at least 1928. By 1959, the orchards were removed, and the Property was developed with the current Sears Department Store building and Auto Center building. A dispenser island with four pumps existed to the west of the northern Auto Center building between at least 1962 and 2002, which was modified from four to two islands in 1974. In 1988, seven gasoline USTs were removed from directly north of the Auto Center. A former Sears dry-cleaning facility was known to have formerly existed on the Property in 1985 as well. One investigation has been completed to date on the Property, Roux Associates' 2019 Phase I and Focused Phase II ESA, for which sampling was conducted in the Auto Center and former Sears building.

The following RECs were identified during the Phase I ESA.

- Former and Current on-Property Auto Repair Facility, Including Former USTs and Dispenser Islands: An automobile repair facility has been present on the Property since at least 1959. Underground storage tanks were present in front of the Auto Center building between at least 1959 and 1988. In 1974, there were three 10,000-gallon USTs and in 1988, seven USTs of unknown size were removed. Additionally, dispenser islands were located west of the Auto Center building, likely between 1962 and 2002. During the Property reconnaissance, significant staining was observed at several locations in the Auto Center basement, including in the vicinity of compressors, hydraulic fluid containers, and hydraulic lifts. In Roux Associates' 2019 Focused Phase II ESA, three soil samples and three soil vapor samples were collected from the basement of the Auto Center and the vicinity of the former USTs. TPH was detected at a maximum concentration of 93,000 µg/m^3 in the Auto Center, above the residential ESL of 20,000 µg/m^3. Although exceedances were not detected for the other samples, the laboratory screening limit of 50,000 µg/m^3 was above the residential ESL, so it is possible that TPH was present at concentrations above the residential screening level but below the laboratory screening limit in the 2019 samples. In addition, the current operation at this facility operates an oil water separator (OWS), above-ground hydraulic lifts with lift cylinders that extend into the basement level, and compressors. During the reconnaissance, staining was observed in the basement of the Auto Shop building beneath the hydraulic lifts and associated hydraulic fluid tanks. This facility is therefore considered a REC for the Property.
- Potential Historical on-Property Pesticide Use: The Property was used for orchards between at least 1928 and 1959, during which time pesticides and/or herbicides may have been used. This potential historical pesticide usage may have caused impacts to shallow soil. If the Property is to be redeveloped for residential purposes in the future, this would be considered a REC.

No CRECs or HRECs were identified during the Phase I ESA.

A *de minimis* concern is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* conditions are not RECs, CRECs, or HRECs. The following *de minimis* conditions were identified:

- Past and present use, storage, and disposal of hazardous materials used in the ordinary course of business located at the Property and surrounding areas.
- Minor staining was observed in the vicinity of a hydraulic elevator near a floor drain, located in the main Sears Department Store building. Based on the installation date of the elevators and the age of the Property buildings, hydraulic oils containing PCBs and/or TPHs may have been used in the equipment, therefore the on-Site elevator equipment represents a *de minimis* condition.

A data gap is a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. The following data gaps were identified during the Phase I ESA.

- Documentation regarding the removal of seven gasoline USTs in 1988, including inspection and approval records, sampling protocol, and soil sample results were not identified during this Phase I ESA. Based on the possibility of a former release that could have been identified during the removal, the lack of documentation for this event is considered a significant data gap.
- Documentation regarding the removal of dispenser islands which occurred at some point between 2002 and 2005 was not identified during this Phase I ESA. Based on the possibility of a former release that could have been identified during the removal, the lack of documentation for this event is considered a significant data gap.
- Documentation regarding the cleanup of 5.4 tons of contaminated soil in 1993, including the nature of the contamination, was not identified during this Phase I ESA and is considered a data gap.
- Documentation regarding the potential cleanup of a battery acid release in a battery room in 2003 was not identified during this Phase I ESA and is considered a data gap.

Based on the findings of this Phase I ESA, Roux recommends that the RECs be further investigated after the existing buildings are demolished and prior to excavation and grading activities at the Site, in compliance with Mitigation Measures 5.9-1 and 5.9-2 of the Buena Park General Plan Update Environmental Impact Report.

10. Report Assumptions and Limitations

The Phase I ESA described herein was conducted by Roux in accordance with ASTM Standard Practice E1527-13, which is consistent with the regulatory requirements for conducting all appropriate inquiries (40 CFR Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule). The preamble for the AAI Rule states:

> *In today's final rule, EPA is referencing the standards and practices developed by ASTM International and known as Standard E1527-05 (entitled "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process") and recognizing the E1527-05 standard as consistent with today's final rule. The Agency determined that this voluntary consensus standard is consistent with today's final rule and is compliant with the statutory criteria for all appropriate inquiries. Persons conducting all appropriate inquiries may use the procedures included in the ASTM E1527-05 standard to comply with today's final rule.*

This AAI Rule was subsequently amended in 2013, as indicated in the following "Background":

> *With today's action, EPA is establishing that parties seeking liability relief under CERCLA's landowner liability protections, as well as recipients of brownfields grants for conducting site assessments, will be considered to have met the standards and practices for all appropriate inquiries, as set forth in the Brownfields Amendments to CERCLA and 40 CFR Part 312, if such parties follow the procedures provided in the ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." EPA made this determination based upon the Agency's finding that the ASTM E1527-13 standard is compliant with the All Appropriate Inquiries Rule. Therefore, parties conducting all appropriate inquiries may use the procedures in the newly issued ASTM E1527-13 standard when conducting all appropriate inquiries.*

It is Roux's understanding that this Phase I ESA was requested so that MGP may qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). One of the requirements that a person acquiring real property must meet in order to qualify for one of these limitations on liability under CERCLA is to perform all appropriate inquiries in conformance with the AAI Rule (or the ASTM Standard Practice E1527-13) prior to the acquisition of the property. The User and MGP haveacknowledged that, under the AAI Rule, Roux's performance of the Phase I ESA described herein will not alone result in MGP satisfying all of the requirements of the AAI Rule and provide a defense to CERCLA liability. Further, the User and MGP have acknowledged that the AAI Rule requires that certain additional inquiries be undertaken to satisfy the CERCLA AAI requirements. Accordingly, Roux makes no guarantees or warranties, expressed or implied, regarding this Phase I ESA, including without limitation, any warranty that this Phase I WSA will in fact qualify MGP for a defense to CERCLA liability.

Roux has performed this Phase I ESA in a professional manner using that degree of skill and care exercised for similar projects under similar conditions by reputable and competent environmental consultants. Professional judgments expressed herein are based on the facts currently available to Roux.

The AAI Rule requires, and the conclusions stated herein represent the application of a variety of engineering and technical disciplines to material facts and conditions associated with the Property. As such, these conclusions are based on subjective interpretations and the exercise of discretion. Many of these facts and conditions are subject to change over time. Accordingly, the conclusions must be considered within this context.

The User and MGP have agreed that Roux shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time the Phase I ESA was performed. To the extent practicable, Roux has identified data gaps and has evaluated the potential significance of such data gaps.

By referencing this information, Roux does not accept responsibility for the accuracy of the underlying reported data.

This Phase I ESA Report should not be considered a legal interpretation of existing environmental laws and regulations. The Phase I ESA was conducted with a reasonable degree of inquiry to identify RECs, but uncertainty is not eliminated. No Phase I ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. The Phase I ESA process is intended to reduce, but not eliminate, the uncertainty involved with identifying RECs.

This Phase I ESA Report is not an appraisal or value judgment of the Property. The User and MGP have agreed that Roux shall not be liable for any use of the Phase I ESA Report as an appraisal or value judgment of the Property.

The Phase I ESA Report has been prepared for the exclusive use of User and MGP for specific application to the Property. The User and MGP have agreed that any third-party use of this Phase I ESA Report, except for use by MGP, is User's and MGP's sole responsibility and at User's and MGP's sole liability.

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

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR 312.

Respectfully submitted,

ROUX ASSOCIATES, INC.

Angela Liang Cutting, P.E.
Principal Engineer

TABLES

(Embedded in Text)

A. Property Addresses

B. Surrounding Area Uses

C. Property History

D. EDR Listings for Facilities Within 1 Mile of the Property

E. EDR Listings for Facilities of Potential Environmental Concern Adjacent to or <1/8 Mile Upgradient of the Property

F. Regulatory Agencies Contacted and Responses

1. Limited Phase II ESA Soil Vapor Sampling Results

FIGURES

1. Property Location Map
2. Site Plan
3. Limited Phase II ESA Soil Vapor Sampling Locations

APPENDICES

A. EDR Radius Map with GeoCheck
B. U.S. Geological Survey Historical Topographic Maps
C. Historical Aerial Photographs
D. City Directory Abstract
E. Sanborn Maps
F. Freedom of Information Act (FOIA) Documents
G. User-Provided Documents
H. Property Photographs
I. Limited Phase II ESA Boring Logs
J. Limited Phase II ESA Analytical Laboratory Report

Table of Contents

Tables (embedded in text)

Figures

Appendices

Executive Summary

Roux Associates, Inc. (Roux) performed a Phase I and a Limited Phase II Environmental Site Assessment (Phase I ESA and Limited Phase II) at 8150 La Palma Avenue in Buena Park, California (Property), associated with the Assessor Parcel Number (APN) 070-511-01. The Phase I ESA and Limited Phase II were performed on behalf of Merlone Geier Partners (MGP) (User).

The Property comprises approximately 25 acres and is currently improved with a 227,503 square-foot vacant Sears Department Store building, detached 13,360 square-foot Auto Center building that is currently operational, and paved parking areas. Roux understands that the Property use is currently commercial, but may in the future be used for residential purposes. The surrounding area is mixed residential and commercial.

This Phase I ESA was performed in general accordance with ASTM Standard Practice E1527-13 on behalf of Merlone Geier Partners (MGP, User), and was performed to identify Recognized Environmental Conditions (RECs), controlled RECs (CRECs), and/or historical RECs (HRECs) at the Property indicating past, current, or material threats of the release of hazardous materials or petroleum hydrocarbons to the Property's soil, groundwater, soil vapor, or surface water. This Phase I ESA was conducted by investigating past Property uses, reviewing the results of a search of environmental databases, reviewing records at relevant government agencies, and performing a reconnaissance of the Property and surrounding area.

The Property was formerly used for agriculture, specifically orchards, beginning in at least 1928. By 1959, the orchards were removed, and the Property was developed with the current Sears Department Store building and Auto Center building. A dispenser island with four pumps existed to the west of the northern Auto Center building between at least 1962 and 2002, which was modified from four to two islands in 1974. In 1988, seven gasoline USTs were removed from directly north of the Auto Center. A former Sears dry-cleaning facility was suspected to have formerly existed on the Property in 1985. The Limited Phase II was performed to assess the potential impacts from the former dry cleaner.

The following RECs were identified during the Phase I ESA.

- Former and Current on-Property Auto Repair Facility, Including Former USTs and Dispenser Islands: An automobile repair facility has been present on the Property since at least 1959. Underground storage tanks were present in front of the Auto Center building between at least 1959 and 1988. In 1974, there were three 10,000-gallon USTs and in 1988, seven USTs of unknown size were removed. Additionally, dispenser islands were located west of the Auto Center building, likely between 1962 and 2002. During the Property reconnaissance, significant staining was observed at several locations in the Auto Center basement, including in the vicinity of compressors, hydraulic fluid containers, and hydraulic lifts. In Roux Associates' 2019 Focused Phase II ESA, three soil samples and three soil vapor samples were collected from the basement of the Auto Center and the vicinity of the former USTs. TPH was detected at a maximum concentration of 93,000 µg/m^3 in the Auto Center, above the residential ESL of 20,000 µg/m^3. Although exceedances were not detected for the other samples, the laboratory screening limit of 50,000 µg/m^3 was above the residential ESL, so it is possible that TPH was present at concentrations above the residential screening level but below the laboratory screening limit in the 2019 samples. In addition, the current operation at this facility operates an oil water separator (OWS), above-ground hydraulic lifts with lift cylinders that extend into the basement level, and compressors.. During the reconnaissance, staining was observed in the basement of the Auto Shop building beneath the hydraulic lifts and associated hydraulic fluid tanks. This facility is therefore considered a REC for the Property.
- Potential Historical on-Property Pesticide Use: The Property was used for orchards between at least 1928 and 1959, during which time pesticides and/or herbicides may have been used. This potential

historical pesticide usage may have caused impacts to shallow soil. If the Property is to be redeveloped for residential purposes in the future, this would be considered a REC.

No CRECs or HRECs were identified during the Phase I ESA.

Based on the findings of this Phase I ESA, Roux recommends that the RECs be further investigated during redevelopment after the existing buildings are demolished.

1. Introduction

Roux Associates, Inc. (Roux) performed a Phase I and a Limited Phase II Environmental Site Assessment (Phase I ESA and Focused Phase II) at 8150 La Palma Avenue in Buena Park, California associated with Assessor Parcel Number (APN) 070-511-01 (Property; Figure 1). The Phase I ESA and Focused Phase II were performed on behalf of Merlone Geier Partners (MGP; User).

The Property comprises approximately 25 acres and is currently improved with a 227,503 square-foot one-story Sears Department Store building, a detached 13,360 square-foot Auto Center one-story building that is currently occupied , and paved parking areas. The Auto Center is currently operational as a vehicle repair center, and as such, hazardous materials including batteries, cleaning chemicals, and motor oil stored in aboveground storage tanks are present at this facility. Roux understands that the Property use is currently commercial, but may be used for residential purposes in the future.

This Phase I ESA was conducted in accordance with the scope of work presented in the proposal submitted to User on November 5, 2021 and in general accordance with the American Society of Testing and Materials' (ASTM) International Standard Practice E1527-13 (Standard Practice for Environmental Site Assessments), consistent with the United States Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI) Rule (40 CFR Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule).[1] The preamble for the AAI Rule states:

> *In today's final rule, EPA is referencing the standards and practices developed by ASTM International and known as Standard E1527-05 (entitled "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process") and recognizing the E1527-05 standard as consistent with today's final rule. The Agency determined that this voluntary consensus standard is consistent with today's final rule and is compliant with the statutory criteria for all appropriate inquiries. Persons conducting all appropriate inquiries may use the procedures included in the ASTM E1527-05 standard to comply with today's final rule.*[2]

This AAI Rule was subsequently amended in 2013, as indicated in the following "Background":

> *With today's action, EPA is establishing that parties seeking liability relief under CERCLA's landowner liability protections, as well as recipients of brownfields grants for conducting site assessments, will be considered to have met the standards and practices for all appropriate inquiries, as set forth in the Brownfields Amendments to CERCLA and 40 CFR Part 312, if such parties follow the procedures provided in the ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." EPA made this determination based upon the Agency's finding that the ASTM E1527-13 standard is compliant with the All Appropriate Inquiries Rule. Therefore, parties conducting all appropriate inquiries may use the procedures in the newly issued ASTM E1527-13 standard when conducting all appropriate inquiries.*[3]

The purpose of the Phase I ESA was to identify, to the extent feasible, Recognized Environmental Conditions (RECs) in connection with the Property. ASTM Standard Practice E1527-13 defines RECs as:

> *…the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any 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*

1 Final Rule and information available at www.epa.gov/swerosps/bf/regneg.htm#final_rule, and https://federalregister.gov/a/2013-31112.

2 Federal Register: November 1, 2005 (Volume 70, Number 210), page 66081.

3 Federal Register: December 30, 2013 (Volume 78, Number 250).

release to the environment. De minimis conditions are not recognized environmental conditions.

ASTM Standard Practice E1527-13 provides that identified RECs can be evaluated and classified into Controlled Recognized Environmental Conditions (CRECs) or Historical Recognized Environmental Conditions (HRECs) based on the following definitions. ASTM Standard Practice E1527-13 defines a CREC as:

> *…a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).*

ASTM Standard Practice E1527-13 defines a HREC as:

> *…a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).*

In order to assess the potential for RECs associated with the Property, Roux utilized a variety of information sources to perform the Phase I ESA, including a radial information search from federal, state, and local regulatory agency databases as well as readily available information from the following sources: Property representative, historical aerial photographs, historical topographic maps, historical Sanborn fire insurance maps, and city directories. Additionally, Freedom of Information Act (FOIA)/public records requests to federal, state, and local regulatory agencies were submitted. The historical research and questionnaire were conducted for the purpose of developing an understanding of the following:

- Current and past use of the Property;
- Current and past use of hazardous substances and/or petroleum at the Property, if any;
- Waste management and disposal practices that might have potentially caused releases or threatened releases of hazardous substances and/or petroleum products at the Property;
- Current and past corrective actions and response activities are undertaken to address past and ongoing releases of hazardous substances and/or petroleum products at the Property, if any;
- The existence of any engineering and/or institutional controls recorded for the Property; and,
- Current and past uses of adjoining properties that could have resulted in releases or threatened releases of hazardous substances and/or petroleum products to the Property.

Roux's Principal Angela Liang Cutting Engineer, Ph.D., P.E.-CA served as the Environmental Professional who conducted the Phase I ESA, with assistance from Staff Assistant Engineer Missy Muilenburg and Staff Assistant Scientist Olivia Bowles. Ms. Cutting possesses sufficient specific education, training, and experience to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases, as defined in 40 CFR §312.1(c) on, at, in, or to a Property, sufficient to meet the objectives and performance factors in 40 CFR §312.20(e) and (f).

2. Methods of Investigation

The methods of investigation used to conduct this Phase I ESA are outlined in the following sections.

2.1 General

The activities performed in conjunction with the Phase I ESA of the Property include:

- Review of federal, state, and local environmental regulatory agency databases provided by Environmental Data Resources, Inc. of Milford, Connecticut (EDR), indicating locations of environmental concern within specified radii from the Property; and
- Submission of FOIA requests/public requests and inquiries to federal, state, and local regulatory agencies.

2.2 Review of Readily Available Information

The resources compiled and reviewed by Roux to-date include the following:

- EDR Radius Report with GeoCheck, dated November 9, 2021 (Appendix A);
- EDR United States Geological Survey Historical Topographic Maps: Downey 15-minute, Anaheim 15-minute, Anaheim 7.5-minute, Los Alamitos 7.5-minute, Artesia 7.5-minute, and Garden Grove 7.5-minute, dated 1896, 1898, 1899, 1901, 1902, 1923, 1925, 1935, 1942, (Appendix B);
- EDR aerial photographs dated 1928, 1938, 1947, 1952, 1954, 1963, 1972, 1977, 1989, 1990, 1994, 2002, 2005, 2009, 2012, and 2016 (Appendix C);
- EDR City Directory Abstract, dated November 15, 2021 (Appendix D);
- EDR Sanborn Map report dated November 9, 2021 (Appendix E);
- Public records from the public agencies listed in Table F in Section 5.2. and relevant documents obtained from public records review (Appendix F); and,
- User-provided documents (Appendix G).

2.3 Property and Surrounding Area Reconnaissance

Pursuant to ASTM Standard Practice E1527-13, Roux conducted reconnaissance of the Property on November 16, 2021 to identify, investigate, and assess potential RECs and other potential environmental concerns. Reconnaissance included observation of the Property to determine the current use and condition of the Property, and indications of past uses of the Property. During the Property reconnaissance, Roux placed particular emphasis on identifying the following features, if present, in accordance with ASTM E1527-13:

- Hazardous substances and petroleum products in connection with identified uses;
- Storage tanks;
- Odors;
- Pools of liquid;
- Drums;
- Hazardous substances and petroleum products containers;
- Unidentified substance containers;

- Polychlorinated biphenyls (PCBs);
- Heating and cooling systems;
- Stains or corrosion;
- Drains and sumps;
- Pits, ponds, or lagoons;
- Stained soil or pavement;
- Stressed vegetation;
- Solid waste;
- Wastewater;
- Wells; and,
- Septic systems.

In addition, Roux observed the general topographic setting of the Property. Photographs from the Property reconnaissance are presented in Appendix H.

3. Property Description

Descriptions of the Property and surrounding areas are included in the following sections. Figure 1 presents the location of the Property in the general context of the city of Buena Park and Figure 2 shows the current Property configuration.

3.1 Property Location and Description

The Property is located at 8150 La Palma Avenue in Buena Park, California associated with APN 070-511-01 and comprises approximately 25 acres. The Property is currently improved with a 227,503 square-foot vacant one-story Sears Department Store building, a detached 13,360 square-foot Auto Center building that is currently operational, and paved parking areas. Roux understands that the Property use is currently commercial, but may in the future be used for residential purposes. The surrounding area is mixed residential and commercial.

3.2 Surrounding Area Uses

The Property is located within the Buena Park Downtown shopping mall and is bordered by La Palma Avenue to the north, Stanton Avenue to the west, On the Mall to the south, and other retail buildings associated with the shopping mall to the east. The surrounding area is mixed residential and commercial. Table A below lists the surrounding area uses.

Table A. Surrounding Area Uses

North	Directly north of the Property is La Palma Avenue, north of which are a commercial shopping center and residential properties.
West	Directly west of the Property is Stanton Avenue. Across Stanton Avenue is the Knotts Berry theme park and associated parking lots.
South	Directly south of the Property is On the Mall, south of which are residential properties.
East	Directly east of the Property are other retail buildings in the Buena Park Downtown shopping mall and associated parking lots.

3.3 Topographic and Hydrogeologic Setting

According to the EDR Radius Map Report (Appendix A) and historical topographic maps (Appendix B), the Property elevation is approximately 85 feet above mean sea level (amsl), and the topographic gradient in the vicinity of the Property is generally flat and gently sloping to the west according to the EDR Geocheck Physical Setting Source Summary (Appendix A).

The Property is located within the Coastal Plain of Orange County groundwater basin,[4] which is bounded by the Puente and Chino Hills to the north, the Santa Ana Mountains to the east, the San Joaquin Hills to the south, the Pacific Ocean to the southwest, and a low topographic divide approximated by the Orange

4 California Department of Water Resources, 2004. *Bulletin 118, South Coast Hydrologic Region, Coastal* Plain of Orange *County Groundwater Basin. Updated* February 27.

County – Los Angeles County line on the northwest. The groundwater basin is dominated by a deep structural depression containing a thick accumulation of fresh water-bearing interbedded marine and continental sand, silt, and clay deposits. Strata in the basin are faulted and folded, and may show rapid changes in grain size. Sediments containing easily recoverable fresh water extend to approximately 2,000 feet in depth.

According to the US Fish and Wildlife National Wetlands Inventory, the nearest surface water body is Carbon Creek, an intermittent stream channel located approximately 0.9 mile south of the Property.[5]

Nearby subsurface investigation reports note that groundwater has been encountered at depths ranging from 7.5 feet to 45 feet below ground surface (bgs) and predominantly flows to the southwest.[6]

5 US Fish and Wildlife National Wetlands Inventory (https:www.fws.gov/wetlands/data/mapper.html). Accessed March 4, 2019.

6 State Water Resources Control Board (SWRCB) GeoTracker Cases: T0605900583; T0605935924; T0605901765

4. Property History

The land use history of the Property was prepared by reviewing topographic maps, historical aerial photographs, city directories, and Sanborn maps. Historical research documentation is provided in Appendices B, C, D, and E. Based on the available sources, the following chronology of the Property was developed (Table B).

Table B. Property History

Source	Year	Status
Historical Topographic Map	1896	The Property is bounded by roads to the north and west. There are two small buildings across the road to the west of the Property and several other small buildings in the surrounding area.
Historical Topographic Map	1898	The 1898 topographic map is consistent with the 1896 topographic map.
Historical Topographic Map	1899	The portion of the map with coverage of the Property is not available for the 1899 topographic map.
Historical Topographic Map	1901	The 1901 topographic map is consistent with the 1989 topographic map.
Historical Topographic Map	1902	The portion of the map with coverage of the Property is not available for the 1902 topographic map.
Historical Topographic Map	1923	The portion of the map with coverage of the Property is not available for the 1923 topographic map.
Historical Topographic Map	1925	The portion of the map with coverage of the Property is not available for the topographic map.
Aerial Photograph	1928	The Property is used for agricultural purposes, specifically, for orchards. The surrounding area is also used for agricultural purposes. Several small buildings are visible to the east and west within approximately 0.25 miles of the Property.
Historical Topographic Map	1935	According to the 1935 topographic map, the Property is at an elevation of approximately 85 feet amsl.
Aerial Photograph	1938	A small building has been constructed on the northwest corner of the Property. Otherwise, the 1938 aerial photograph is generally consistent with the 1928 aerial photograph.
Historical Topographic Map	1942/1947	The small building in the northwest corner of the Property is shown on the 1942/1947 topographic map. The presence of orchards on the Property and surrounding areas is depicted as well.
Historical Topographic Map	1943	The portion of the map with coverage of the Property is not available for the 1943 topographic map.
Historical Topographic Map	1945	The portion of the map with coverage of the Property is not available for the 1945 topographic map.
Aerial Photograph	1947	It appears from the 1947 aerial photograph that the small building shown on the 1938 aerial photograph has been removed. The Property and surrounding areas continue to be used for agricultural purposes.

Source	Year	Status
Historical Topographic Map	1949	The small building on the northwest corner of the Property is still shown on the 1949 topographic map.
Historical Topographic Map	1950	The 1950 topographic map is consistent with the 1949 topographic map.
Aerial Photograph	1952	The 1952 aerial photograph is consistent with the 1947 aerial photograph.
Aerial Photograph	1954	The 1954 aerial photograph is consistent with the 1952 aerial photograph.
Aerial Photograph	1963	There are no remaining orchards on the Property. The Property now comprises of a large building (current Department Store building) connected to a smaller building (former Garden Center building) and a loading dock to the south, another detached building to the southwest (current Auto Center building), and paved parking areas. There is a structure directly west of the Auto Center building that appears to be four dispenser islands. The Property is the western end of a larger retail center, the eastern end of which is still under development. The surrounding area has undergone dramatic development, largely comprised of residential areas. Pockets of agricultural land remain across the street to the northeast and to the southwest. Additionally, Knotts Berry Farm (an amusement park) is present west of the Property.
Historical Topographic Map	1964	The portion of the map with coverage of the Property is not available in the 1964 topographic map.
City Directory	1964	Listings for the Property are for Sears Roebuck Co.
Historical Topographic Map	1965	According to the 1965 topographic map, the Property is the western end of the Buena Park Shopping Center. The surrounding area is predominantly residential with some commercial properties. Knotts Berry Farm Theme Park is approximately 1,400 feet west of the Property.
Aerial Photograph	1972	Between 1963 and 1972, another building south of the Auto Center building was constructed on the Property. Additionally, the area across the road to the north of the Property is has been developed with buildings and paved parking areas. The eastern end of the shopping center has been completed.
Historical Topographic Map	1972	The 1972 topographic map is consistent with the 1972 aerial photograph.
City Directory	1973	Listings for the Property are for Sears Roebuck and Allstate Insurance Sales. The following off-Site listings are noted: • Buena Park Laundraclean at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • Blair's Shell Service Station at 7984 La Palma Ave, across Stanton Avenue to the west of the Property.
City Directory	1976	Listings for the Property are for Sears Roebuck, including Sears Photo Studios, and Allstate Insurance Sales. The following off-Site listings are noted:

Source	Year	Status
		• Buena Park Laundraclean at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • Bob's Super Shell Service Station at 7984 La Palma Ave, across Stanton Avenue to the west of the Property.
Aerial Photograph	1977	On the Property, the structure west of the Auto Center building that appeared to be four dispenser islands seems to have been reduced to two dispenser islands, with the northern portion of the structure appearing to have been removed.
City Directory	1982	Listings for the Property are for Sears Roebuck, USA Petroleum (a potential gasoline service station), and Allstate Insurance Sales. The following off-Site listings are noted: • Old Fashioned Cleaners at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • Bob's Super Shell Service Station at 7984 La Palma Ave, across Stanton Avenue to the west of the Property.
Historical Topographic Map	1981	The 1981 topographic map is consistent with the 1977 aerial photograph.
City Directory	1987	Listings for the Property are for Sears Roebuck, including Sears Dry-Cleaning and Photo Studios, and other retail companies. The following off-Site listings are noted: • Old Fashioned Cleaners at 7942 La Palma Ave, approximately 350 feet west of the Property. • Goodyear Tire and Rubber Co at 7960 La Palma Ave, approximately 300 feet west of the Property. • 7984 La Palma Ave is no longer listed as a gasoline service station.
Aerial Photograph	1987	A small building has been constructed on the northwest corner of the Property. The agricultural fields across the street to the southwest of the Property are now a part of a large, paved parking area.
Aerial Photograph	1989	A large new commercial development has been added across the street to the northeast of the Property. Otherwise, the 1989 aerial photograph is consistent with the 1987 aerial photograph.
Aerial Photograph	1990	The 1990 aerial photograph is consistent with the 1989 aerial photograph.
City Directory	1992	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Old Fashioned Cleaners at 7942 La Palma Ave, approximately 350 feet west of the Property.

Source	Year	Status
		• All Seasons Tire and Auto Center at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	1994	The 1994 aerial photograph is consistent with the 1990 aerial photograph.
City Directory	1995	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • All Seasons Tire and Auto Center at 7960 La Palma Ave, approximately 300 feet west of the Property. • 7942 La Palma Ave no longer has a listing.
Aerial Photograph	2002	The parking lot area in the southeastern portion of the Property is undergoing redevelopment as part of larger improvement activities across the southern and eastern ends of the shopping center. The commercial development across the street to the northeast of the Property is also being redeveloped.
City Directory	2005	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • All Seasons Tire and Auto Center and U-Haul at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2005	The Garden Center building on the Property has been demolished and replaced with a paved parking area; however, the loading dock remains. Several large buildings and associated parking lots have been added in the redeveloped area south of the main shopping center building. Additionally, the building south of the Auto Center building, the structure that at one point may have been dispenser islands, and the building at the northwest corner of the Property have also been demolished. A concrete drainage ditch runs along the southern portion of the Property. The area across the street to the northeast of the Property is now developed with a large building and paved parking area.
City Directory	2005	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Certified Tire BP at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2009	The 2009 aerial photograph is consistent with the 2005 aerial photograph.
City Directory	2010	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Certified Tire BP at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2012	The 2012 aerial photograph is consistent with the 2009 aerial photograph.

Source	Year	Status
Historical Topographic Map	2012	Little information is available in the 2012 topographic map. However, Property features are likely similar to those shown on the 2012 aerial photograph.
City Directory	2014	Listings for the Property are for Sears Roebuck and other retail companies. The following off-Site listings are noted: • Certified Tire BP at 7960 La Palma Ave, approximately 300 feet west of the Property.
Aerial Photograph	2016	The 2016 aerial photograph is consistent with the 2012 aerial photograph.

A summary of the Property's history, including these records, is provided in Section 6.

5. Records Review

5.1 EDR Radius Map Report

Roux used a computerized environmental database and radius map report prepared by EDR to conduct a government records database search of sites of potential environmental concern within a maximum of a one-mile radius of the Property. Appendix A contains a complete copy of the EDR Radius Map Report with GeoCheck® and a description of the databases. Tables C and D below show the search results for all the pertinent databases that indicated potential environmental concerns.

Table C. EDR Listings for Facilities Within 1 mile of the Property

Database[7]	Target Property	<1/8 mile	1/8 – 1/4 mile	1/4 – 1/2 mile	1/2 – 1 mile	Total
CORRACTS	0	0	0	0	1	1
CA FID UST	0	1	0	NR	NR	1
CERS HAZ WASTE	0	5	5	NR	NR	10
CERS HAZ WASTE	0	1	NR	NR	NR	1
CHMIRS	1	0	NR	NR	NR	1
CIWQS	0	1	NR	NR	NR	1
Cortese	0	0	1	2	NR	3
DRYCLEANERS	0	2	1	NR	NR	3
ECHO	1	3	NR	NR	NR	4
EDR Hist Auto	0	3	NR	NR	NR	3
EDR Hist Cleaner	0	1	NR	NR	NR	1
ENVIROSTOR	0	0	0	1	9	10
FINDS	1	4	NR	NR	NR	5
HAZNET	2	6	NR	NR	NR	8
HIST CORTESE	0	0	1	3	NR	4
HIST UST	0	0	1	NR	NR	1
HWP	0	0	0	0	1	1
HWTS	6	NR	NR	NR	NR	6
LUST	0	0	2	3	NR	5
PFAS	0	0	1	0	NR	1
RCRA NonGen / NLR	0	18	26	NR	NR	44
RCRA-LQG	1	0	0	NR	NR	1
RCRA-SQG	0	1	3	NR	NR	4

7 Descriptions of the EDR databases can be found in the EDR Radius Report (Appendix A).

Database[7]	Target Property	<1/8 mile	1/8 – 1/4 mile	1/4 – 1/2 mile	1/2 – 1 mile	Total
SWEEPS UST	0	1	0	NR	NR	1
UST	1	1	1	NR	NR	3
TOTAL	13	48	42	9	11	123

NR = Database not requested (NR) at the specified radius interval

Based on the EDR listings provided in Table D, only the Property and the offsite facilities that meet the criteria presented below are discussed further in Sections 5.1.1 and 5.1.2.

- Facilities located immediately adjacent to the Property were examined due to their proximity to the Property and the potential for surface water discharges (e.g., stormwater runoff, surface water effluent discharges) to enter the Property or through the migration of groundwater or soil vapor.
- Facilities, within 1/8-mile of the Property, located topographically or hydraulically upgradient of the Property were examined due to their potential environmental impact to the Property through the migration of contaminated surface water, groundwater, and/or soil vapor. As discussed in Section 3.3, groundwater flows predominantly to the southwest in the vicinity of the Property, generally following surface topography; as such, facilities immediately adjacent to the Property or within 1/8-mile to the northeast and east of the Property are discussed herein as having a potential impact on subsurface conditions at the Property.
- For upgradient or adjacent facilities, the review is focused on database listings at off-site facilities that may be indicative of a release that could impact the Property. Facilities with records in databases where listings are only for regular site operations, with no evidence of release, are not by themselves considered to represent potential RECs for the Property (e.g., listings in a database of hazardous waste manifests, or of hazardous materials use). The following databases contain such records. If no release has specifically been reported in another database, then the presence of a facility with listings only in these following databases is assumed not to represent a potential REC for the Property, and listings for those facilities are not included for further review in this Section:
    - FINDS
    - ECHO
    - EMI
    - HAZNET
    - HWTS
    - RCRA-SQG
    - RCRA-LQG
    - CERS
    - CERS HAZ WASTE

As such, facility listings located on the Property, immediately adjacent to the Property, or within 1/8-mile of the Property to the east and northeast are discussed as having a potential impact on subsurface conditions at the Property.

Table D. EDR Listings for Facilities of Potential Environmental Concern Adjacent to or <1/8-Mile of the Property

Database*	Distance and Orientation Relative to the Property	Facility Listing	EDR Address
FINDS, ECHO, RCRA-LQG, UST, HWTS, HAZNET	TP	SEARS BUENA PARK	8150 LA PALMA AVE
CHMIRS	TP	UNTITLED FACILITY	8150 LA PALMA AVE
EDR HIST AUTO	Adjacent, east	KOLL AGENT FOR SUNRISE BP	8308 ON THE MALL
HWTS,HAZNET, CIWQS, CERS	Adjacent, east	BUENA PARK MALL	8308 ON THE MALL
RCRA-SQG, HWTS,RCRA-SQG,FINDS,ECHO,HAZNET	Adjacent, northwest	PHOTO MAKERS UNITECH CO	LA PALMA AND STANTON
EDR HIST AUTO	130 feet west	BLAIR DONALD R	7984 LA PALMA
RCRA NONGEN / NLR	193 feet northeast	KOHL'S INC - STORE #589	8191 LA PALMA AVE
HWTS,RCRA NONGEN / NLR,FINDS,ECHO,HAZNET	200 feet east	KITS CAMERA C24	8289 ON THE MALL UNIT D
RCRA NONGEN / NLR	253 feet north	NAHI ABRAHAM	7958 CAMELLIA DR
CERS HAZ WASTE,CA FID UST,CERS, UST,SWEEPS UST, EDR HIST AUTO, RCRA NONGEN / NLR	260 feet west	ALL SEASON TIRE (FORMERLY CERTIFIED TIRE)	7960 LA PALMA AVE
EDR HIST CLEANER, HWTS,DRYCLEANERS	350 feet west	OLD FASHIONED CLEANERS	7942 LA PALMA
CERS HAZ WASTE, FINDS,ECHO, RCRA NONGEN / NLR, HWTS,HAZNET	350 feet east	BATH & BODY WORKS #1427	8280 ON THE MALL SPC 270

Database*	Distance and Orientation Relative to the Property	Facility Listing	EDR Address
EDR HIST AUTO	390 feet east	KOLL AGENT FOR SUNRISE BP	8308 ON THE MALL
CIWQS	390 feet east	8308 ON THE MALL	8308 ON THE MALL
HWTS,CERS HAZ WASTE,HAZNET, RCRA NONGEN / NLR, FINDS,ECHO	420 feet east	ROSS DRESS FOR LESS #0440	8361 ON THE MALL
RCRA NONGEN / NLR, HWTS,CERS HAZ WASTE,HAZNET	500 feet east	TJ MAXX 1385	8201 ON THE MALL
FINDS, ECHO, RCRA NONGEN / NLR, HWTS,CERS HAZ WASTE,HAZNET	750 feet east	BED BATH & BEYOND #325	8390 ON THE MALL

*Databases are defined in EDR Radius Report (Appendix A)
TP = Target property

Based on the EDR Radius Report, there are EDR database listings for 13 facilities at the Property. The EDR Radius Report also identified 110 offsite facilities with EDR database listings. The relevant EDR database listings for the Property and off-Property facilities are provided in Sections 5.1.1. and 5.1.2.

5.1.1 Property Listings

Sears Buena Park:

ECHO: The facility is listed in the Enforcement and Compliance Online database with no recorded violations. The date of last inspection is shown as March 1, 1993. The facility has an active RCRA registry ID as a small quantity generator.

FINDS: This facility is listed in the EPA's index system; however, no other information is available.

HAZNET: the facility disposed of the following small quantities of hazardous materials:

- 2014 - 2017: Alkaline solution without metals and a pH more than 12.5; detergent waste chemicals; other empty containers of 30 gallons or more; aqueous solution with total organic residues less than 10%; other organic solids; other inorganic solid waste; unspecified oil-containing waste; hydrocarbon solvents; latex waste; unspecified solvent mixture; and asbestos containing waste.
- 2011 – 2013: waste type is not specified in the listings.
- 2006 - 2010: oil/water separation sludge; aqueous solution with total organic residues less than 10%; liquids with halogenated organic compounds more than 1,000 milligrams per liter; other organic solids; off-specification, aged, or surplus organics; unspecified solvent mixture; and hydrocarbon solvents.

- 2004 - 2005: waste oil and mixed oil; oil/water separation sludge; and other organic solids.
- 2002 - 2003: asbestos containing waste; unspecified solvent mixture; other inorganic solid waste.
- 2001: other inorganic solids; and aqueous solution with total organic residues less than 10%.
- 1995 - 1999: asbestos containing waste; aqueous solution with total organic residues less than 10%; and unspecified solvent mixture.
- 1993: unspecified sludge waste; adhesives; paint sludge; other inorganic solid waste; unspecified sludge waste; and contaminated soil from site cleanup.

This listing records a total of 5.4 tons of contaminated soil from a site cleanup off-hauled from the Property in 1993. No other information regarding the contaminated soil was found in this listing.

RCRA-SQG: The facility was listed as a RCRA – small quantity generator of hazardous waste since at least 1996 and was listed as a large quantity generator of hazardous waste between at least 1985 and 1998. As a large quantity generator, the facility received unspecified violations in 1991 and 1993.

UST: The facility has or had a UST registered with Orange County.

Untitled Facility

CHMIRS: The facility has a report in the California Hazardous Material Incident Reporting System from 2003, under Sears Roebuck and Co. The Buena Park Fire Department noted that a substance was released from a battery room, which appeared to have occurred over time, and was discovered during remodeling. An environmental contractor tested the concrete and obtained a positive reading for battery acid. No other relevant information is available from this listing.

5.1.2 Off-Property Listings

Photo Makers Unitech Co at La Palma and Stanton (northwest-adjacent)

RCRA-SQG: This facility was listed as a RCRA – small quantity generator in at least 1988. No violations were noted.

Blair, Donald R at 7984 La Palma Ave (130 feet west)

EDR HIST AUTO: This facility is listed as having been gasoline service station from at least 1969 to 1971.

Kits Camera at 8289 On The Mall Unit D (200 feet east)

ECHO: This facility is listed as inactive in the Enforcement and Compliance Online database with no recorded violations; no other relevant information is available.

FINDS: This facility is listed in the EPA's index system. No waste codes, process information, or report data were available for this listing.

HAZNET: This facility disposed of the following hazardous wastes between 1993 and 1997: photochemicals/photoprocessing waste; other inorganic solid waste; and metal sludge as an alkaline solution.

RCRA – NONGEN / NLR: This facility was listed as a RCRA – non-generator in at least 1998 and a small quantity generator in 1993. No violations were noted.

All Season Tire (formerly Certified Tire) at 7960 La Palma Ave (260 feet west)

CA FID UST: This facility is listed in the Facility Inventory Database, which lists active or inactive UST locations.

EDR HIST AUTO: This facility is listed as having been an auto parts store from at least 1990 to1996 and a gasoline service station in at least 2005 and 2006.

SWEEPS UST: This facility is recorded as having a petroleum UST, with a last act date in 1992.

UST: The facility had a UST registered with Orange County in 1954.

CERS: This facility is listed in CERS as a chemical storage facility. It was recorded as having multiple minor violations, including for improper waste container storage and failure to keep waste manifests on site. The facility was recorded as having a 240-gallon used oil tank, two 55-gallon used antifreeze drum, one waste brake fluid drum, and three used and drained oil filter drums.

EDR HIST AUTO: This facility was listed as an Automotive Parts Shop, General Automotive Repair Shop, and Gasoline Service Station between 1990 and 2006.

Bath & Body Works at 8280 On The Mall (350 feet east)

HAZNET: This facility disposed of small quantities of off-specification, aged, or surplus organics in 2017.

CERS HAZ WASTE: This facility was listed as a hazardous waste generator. No violations were reported.

FINDS, ECHO: This facility is listed in the FINDS and ECHO databases as a miscellaneous store retailer. No violations were reported.

Old Fashioned Cleaners at 7942 La Palma Ave (350 feet west)

DRYCLEANERS: This facility had a dry-cleaning equipment permit to use perchloroethylene (PCE).

EDR HIST CLEANER: This facility is listed as having been a dry-cleaning plant from at least 1977 to 1994.

HWTS: This facility was inactive in HWTS as of 1995.

Buena Park Mall at 8308 On The Mall (390 feet east)

HAZNET: This facility disposed of 4.214 tons of asbestos containing waste in 1998.

Koll Agent For Sunrise BP at 8308 On The Mall (390 feet east)

EDR HIST AUTO: This facility is listed as having been a gasoline service station from at least 1996 to 1997.

8308 On The Mall at 8308 On The Mall (390 feet east)

CIWQS: This facility is listed in the California Integrated Water Quality System for a storm water construction project that happened at some point between 1997 and 2001.

Buena Park Mall at 8282 On The Mall (420 feet east)

HAZNET: This facility disposed of 4.214 tons of asbestos containing waste in 1998.

Ross Dress For Less at 8361 On The Mall (420 feet east)

FINDS: This facility is listed in the EPA's index system as a Family Clothing Store. No waste codes or process information were listed for the facility.

HAZNET: This facility disposed of the following hazardous waste between 2015 and 2017: off-specification, aged, or surplus organics; and alkaline solution without metals and a pH of more than 12.5.

HWTS: This facility has an active listing in HWTS as of 2020.

CERS HAZ WASTE: This facility was listed as a hazardous waste generator.

Bed Bath & Beyond at 8390 On The Mall (750 feet east)

FINDS, ECHO: This facility is listed in the EPA's index systems as a Miscellaneous Home Furnishing Store. No waste codes or process information were listed for the facility.

HAZNET: This facility disposed of the following hazardous waste from 2014 to 2017: unspecified solvent mixture; other inorganic solid waste; off-specification, aged, or surplus organics; alkaline solution without metals and a pH of more than 12.5; and liquids with a pH of less than 2. Types of hazardous waste disposed of in 2012 and 2013 were not described.

Of these listings, none indicate a potential release. The historic dry-cleaning facility at 7942 La Palma Avenue and automotive facility at All Season Tire could be considered facilities of interest based on the likelihood of historic releases; however, these facilities are located hydraulically downgradient of the Property and are therefore not considered facilities of interest for this Phase I ESA.

5.2 FOIA/Public Records Request Responses

FOIA/Public Records Act requests for the Property were submitted to federal, state, and local regulatory agencies and the requests and responses are summarized in Table F below.

A summary of the FOIA/Public Records Act responses that may pose an environmental concern to the Property is provided in Section 6.

Table F. Regulatory Agencies Contacted and Responses

Agency	Status
South Coast Air Quality Management District	• Records were requested on November 9, 2021. Response was received on November 16, 2021 with records for the Property.
City of Buena Park	• Records were requested on November 8, 2021. Response was received on November 15 and 18, 2021 with records for the Property.
Orange County Public Works Department	• Records were requested on November 9, 2021. Response was received on November 15, 2021 stating that no records were available for the Property.

Agency	Status
Orange County Sanitation Department	• Records were requested on November 9, 2021. Response was received on November 12, 2021 stating that no records were available for the Property.
Orange County Health Care Agency Environmental Health Division	• Records were requested on November 9, 2021. Response was received on November 18, 2021 with records for the Property.
Department of Toxic Substances Control (DTSC), including online Envirostor and Hazardous Waste Tracking System (HWTS)	• Records were requested on November 9, 2021. Response was received on November 10, 2021 stating that no records were available for the Property.
Santa Ana Regional Water Quality Control Board (SARWQCB) online GeoTracker files	• Records were requested on November 9, 2021. Response was received from SARWQCB on November 12, 2021 stating that no records were available for the Property.
CalEPA Regulated Site Portal	• The CalEPA Regulated Site Portal was queried on November 10, 2021. Available records are summarized in Section 5.2.
CalGEM GIS WellFinder	• The CalGEM GIS WellFinder was queried on November 10, 2021. No wells were found in the vicinity of the Property.
GAMA Groundwater Information System	• The GAMA Groundwater Information System was queried on November 10, 2021. Five monitoring wells were found within an approximate 0.25-mile radius of the Property.

Information obtained from all agency correspondence and their associated online databases is included in Appendix F and is summarized below.

South Coast Air Quality Management District

Records were requested on November 9, 2021. A response was received on November 16, 2021 with the following records:

- Permits to operate the following:
  - Four automatic paint and solvent spray booths in 1949 (likely an erroneous date) and 1959 (currently inactive); and
  - Three dichlorodifluoromethane (CFC-12) recovery/recycling operations for motor vehicle air conditioning systems in 1992 that are currently inactive.
- A notice of violation (NOV) was given to the facility in 1989 for failure to submit a Transportation Plan.
- Notification Reports indicate that in 2003, an environmental company removed a total of 8,177 square feet of Class I asbestos-containing materials in the garden/auto shop areas during renovation activities.

City of Buena Park

Building Division:

Permits between 1959 and the early 2000s describe general construction activities such as developing a flower concession store, beauty salon store, setting up a Christmas tree lot, a carnival, various building alterations, and include permits for heating, ventilation, refrigeration & air conditioning and plumbing records. Stormwater NPDES certifications were also included for several of the permits issued after 2010. and Noted records include the following:

- In 1958, a building permit was issued to Sears Roebuck for the Property. Other permits, such as for plumbing and electrical, are also available from this time.
- In 1958, a building permit was issued for a service station.
- A 1965 Certificate of Occupancy was issued for automotive service on the Property.
- A figure with an unknown date indicates there was a fuel dispenser island with four pumps directly west of the Auto Center building at some point (Figure 2).
- In 1974, a building permit was issued for two raised dispenser islands.
- A 1974 figure indicates the presence of three 10,000-gallon USTs with unknown contents.
- In 1984, permits and inspection reports indicate that during interior and exterior improvements, an escalator was installed.
- In 1986, a building permit was issued for an above-ground storage tank (AST) for waste oil inside the auto repair shop.
- A 1992 waste and vent diagram is provided.

Code Enforcement Division:

- Code enforcement inspections between 2001 and 2019 show code violations unrelated to potential environmental issues such as light poles missing electrical panels, structures needing maintenance, trucks and motorhomes using the parking lot for overnight storage, and lights glaring into residential properties.
- In 2003, a Staff Report for the Planning Commission indicates that the Auto Center building was planned for redevelopment and the Garden Center building, and a former Great Western Bank building were planned to be demolished and converted to parking, along with reconfiguration of the parking spaces and landscaping adjacent to the Auto Center building.

Planning Division:

- In 1956, a resolution approval indicates that the Property was approved to be rezoned from single-family residential to a central business zone.
- A 1959 figure shows underground utilities at the Property from this time.
- In 1961, a resolution approval indicates that a canopy was added to an existing service station at the east side of Stanton Avenue, approximately 812 feet south of La Palma Avenue.
- In 1964, a resolution approval indicates that an automotive center building was approved, which likely refers to the additional building south of the current Auto Center building.
- In 1964, a resolution approval indicates that a canopy was erected over an open sales area at the Garden Center. If this sales area was located directly east of the building, it could explain the possible building in that area observed in the 1972 and 1977 aerial photographs.
- In 1974, a resolution approval indicates that the building at the northeast corner of the Property was originally for Citizens Savings & Loan.

- In 1980, a resolution approval indicates that the existing automotive fuel center was relocated and reconstructed. The exact location of this relocation is not identified but was likely still within the vicinity of the Auto Center building.
- In 1980, a resolution approval indicates that the building at the northeast corner of the Property became occupied by Great Western Savings and Loan.
- In 1984, a resolution approval indicates that exterior modifications were made to the Auto Center building including the following:
    - The document describes former gasoline dispending islands on the west side of the building, on which planters were currently located; the resolution states that the dispensing islands and planters both need to be removed.
    - The resolution states that "gasoline tanks" would need to be removed to the satisfaction of the Fire Department. This is likely referring to the former USTs in front of the Auto Center building.
- Additional exterior building modifications were approved for the Auto Center building in 1998 and 2003. Neither document describes dispenser islands or USTs.

Additional resolution approvals between 1956 and 2003 describe a key shop, landscaping, signage, beer and wine sales, and general expansions, modifications, and remodeling

Public Works

One document was included in Public Works records, an NPDES listing for the Christmas tree lot on the Property, Tree Kings. No violations were reported, and the permit was removed in 2014.

Orange County Health Care Agency Environmental Health Division

Records were requested on November 8, 2021. A response received on November 18, 2019 with the following documents:

- Inspection reports from 2009 to 2020 for hazardous waste with a minor violation related to failure to keep waste documentation on site, which was rectified in 2019.
- Inspection reports between 2010 and 2020 indicate the following hazardous wastes: brake fluid, clarifier sludge, aqueous brake parts cleaner, waste oil, absorbent, spent radiator coolant, spent lead/acid batteries, used oil filters, returned/damage flammable products, aerosols, paint debris, water base paint, and fluorescent lights.
- A 2016 inspection report indicates the following petroleum products stored in the auto repair shop:
    - A 500-gallon waste oil tank;
    - A 55-gallon waste oil drum;
    - Five new oil drums between 150 and 300 gallons;
    - A 110-gallon synthetic oil tank; and
    - A 55-gallon automatic transmission fluid tank.
- A 2020 Aboveground Petroleum Storage Tank Inspection Report indicated the following petroleum products stored in the auto repair shop:
    - A 500-gallon used oil tank;
    - Three motor oil tanks (capacity 750 gallons, 500 gallons, and 220 gallons); and
    - A 100-gallon automatic transmission fluid tank.
- A 2021 Hazardous Materials and Wastes Inventory Matrix Report indicates the following petroleum products stored in the auto repair shop:

- A 350-gallon waste oil tank;
- A 500-gallon motor oil tank;
- A 300-gallon storage container for used oil filters;
- A 55-gallon drum storing ethylene glycol
- A 30-gallon drum storing waste brake fluid; and
- A 300-gallon storage container for waste absorbent material

- California Environmental Reporting System (CERS) listings from 2018 to 2021 indicate that the facility had the following hazardous material inventory at this time:
  - ASTs with new motor oil, used motor oil, used motor oil filters, new antifreeze, and used antifreeze;
  - Used lead acid batteries, floor degreaser, new transmission fluid, and diesel fuel; and
  - Propane, waste propane, waste flammable liquids, waste oxidizers, waste toxics, waste aerosols, and floor stripper.

Santa Ana Regional Water Quality Control Board (SARWQCB) online GeoTracker files

Records were requested on November 9, 2021. Response was received from SARWQCB on November 12, 2021 stating that no records were available for the Property. Roux queried RWQCB's online GeoTracker® database on November 10, 2021 and identified one listing in the vicinity of the Property, a closed LUST case located at the J.C. Penney department store approximately 820 feet upgradient. This LUST case regarded a diesel spill that was discovered in 1996 upon closure of a corroded storage tank (unspecified whether AST or UST). The case was closed in June 1997, and no further information is available on GeoTracker. Due to the distance of this site from the Property and the length of time for which the case has been closed, this closed LUST case is not regarded as an environmental concern for this Phase I ESA.

Department of Toxic Substances Control (DTSC), including online Envirostor and Hazardous Waste Tracking System (HWTS)

Records were requested on November 9, 2021. A response was received on November 10, 2021 stating that no records were available for the Property. Additionally, online databases, Envirostor and HWTS, were queried on November 10, 2021. No listings were available in the vicinity of the Property on Envirostor; however, two EPA listings were identified for the Property on HWTS, including a 2003 ID for Sunrise Buena Park that is currently inactive and a 1987 ID for Sears that is currently inactive.

CalEPA Regulated Site Portal

The CalEPA Regulated Site Portal was queried on November 9, 2021. 19 regulated sites were found in the vicinity of the Property, primarily within the adjacent shopping center buildings, including Dollar Tree, Michael's, Carl's Jr, and Walmart. Minor violations were noted for several of these sites, including for improper storage of hazardous waste or lack of documentation, but no indications of a potential release. Michael's was noted as storing 10-gallon containers of consumer/universal waste. Walmart was recorded as having several aboveground storage tanks containing petroleum, including an 800-gallon used oil tank, a 300-gallon used oil tank, and two 400-gallon new oil tanks. All tanks at this site were observed as being secondarily contained as of the latest inspection in 2019, and no evidence of a potential release was noted.

CalGEM GIS WellFinder (formerly DOGGR)

- The CalGEM GIS WellFinder database was queried on November 10, 2021. No oil and gas wells were found in the vicinity of the Property.

GAMA Groundwater Information System

- The GAMA Groundwater Information System was queried on November 10, 2021. Five monitoring wells were found within an approximately 0.25-mile radius of the Property, all in a relatively cross-gradient direction.

In summary, the Property was first developed between 1958 and 1959. A 1958 building permit for a "service station" indicates that USTs and fuel dispensers may have existed since the Auto Center building was developed, around 1959. Additionally, a 1974 figure from City of Buena Park records indicates the presence of three 10,000-gallon USTs in front of the Auto Center building at this time. City of Buena Park Building department records also indicate that there was a fuel dispenser island with four pumps directly west of the Auto Center building which was modified in 1974. None of the public records received included any documentation related to the removal events of the former USTs or fuel dispenser islands. USTs and dispenser islands store petroleum products and have the potential to release large quantities of these products to subsurface soil and groundwater with a risk of volatilization into soil vapor. Therefore, the former presence of USTs and dispenser islands without conclusive documentation that no releases occurred is considered a REC for the Property.

In 1964, an automotive service station had been developed, which likely refers to the former building south of the Auto Center building. In 1986, a building permit was issued for what is likely the current waste oil AST system in the Auto Center building. The Auto Center also had four paint and solvent spray booths in at least 1959 and three CFC-12 recovery/recycling operations for motor vehicle air conditioning systems in at least 1992. During the 2003 redevelopment activities a total of 8,177 square feet of Class I asbestos-containing materials were removed from the Garden Center building, and asbestos was later identified in numerous materials throughout the buildings on the Property. However, assessment of asbestos-containing materials is out of the scope of this Phase I ESA.

The Property received SCAQMD and City of Buena Park Code Enforcement violations, although none reviewed during this Phase I ESA are indicative of a potential release. No violations with the Orange County Health Care Agency Environmental Health Division were identified during this Phase I ESA.

5.3 User-Provided Documents

The following documents were provided by the User (Appendix G).

- 1988 *Compaction Report for Gasoline Storage Tank Backfill Area:*[8] According to this report, six gasoline USTs were removed and backfilled with silty sand. The report indicated that the excavated USTs were located directly north of the auto repair shop, on the west side of the shop.
- 1986-1989 Subcontractor Invoices and Contracts:
    - A 1989 invoice from Jerry's Backhoe Service indicates that the UST excavation pit was 1,455 square feet.

[8] Geo-Etka, Inc. 1988. *Compaction Report for Gasoline Storage Tank Backfill Area, 8150 La Palma Avenue.* October 18.

- A 1988 invoice from Petroleum Industry Consultants, Inc. indicates that six soil samples were collected and analyzed during the UST excavation. Results from these analyses were not provided with this documentation.
- A 1988 invoice from Hank's Service Station Maintenance indicates that a waste oil AST system and piping were installed in 1988.
- A 1986 contract and invoices from 1988 and 1989 between Sears and Hank's Service Station Maintenance were provided for the removal of seven underground petroleum storage tanks.
- A 1988 invoice from G.V. Adams Environmental Services indicates that the seven underground storage tanks were removed.

- 2012 *Asbestos Inspection Survey Report:*[9] According to this report, a building survey for asbestos-containing materials, limited to the sampling of existing flooring materials, was conducted to update previous asbestos inspection data from 1997. Friable asbestos was identified in numerous materials throughout the buildings. The report indicates that asbestos-containing materials were also identified during the 1997 survey and that asbestos-containing materials had been previously removed from pipe insulation from the retail sales floor in 1999, pipe fittings from the retail sales floor in 2002, and a pipe fitting in the mechanical room in 2003.The report also states that the store opened in 1959. However, assessment of asbestos-containing materials is out of the scope of this Phase I ESA.
- *2019 Roux Associates Phase I and Focused Phase II Environmental Site Assessment:* In Roux Associates' 2019 Phase I investigation, three RECs were identified – the former on-Property dry-cleaning facility, the current on-Property auto repair facility, and the former USTs and dispenser islands that were present in front of the auto center building between 1959 and 1988. A Focused Phase II was conducted to assess potential VOC impacts due to these RECs, which consisted of soil and soil vapor sampling. A total of six borings were advanced to 5.5 to 15.5 feet in the vicinity of the former USTs, the basement of the current Auto Center building, and the basement of Sears in the potential historic dry cleaner location. The only exceedance was for TPH, detected at the boring in the basement of the Auto Center. Roux found that TPH was detected in this location at a maximum concentration of 93,000 µg/m^3, above the commercial environmental screening limit (ESL) of 83,000 µg/m^3 and above the residential ESL of 20,000 µg/m^3. All other TPH results were below the laboratory reporting limit of 50,000 µg/m^3, however, this reporting limit is higher than the residential ESL. Similarly, no exceedances were detected for the three borings advanced in the assumed location of the former on-Property dry cleaners, however, the laboratory detection limit of 100 µg/m^3 was above the residential cancer risk ESLs of 15 µg/m^3 for PCE and 16 ug/m^3 for TCE.

5.3.1 User-Provided Documents Summary

The Property was first commercially developed between 1958 and 1959. A 1958 building permit for a "service station" indicates that USTs and fuel dispensers may have existed since the Auto Center building was developed, around 1959. Additionally, a 1974 figure from City of Buena Park records indicates the presence of three 10,000-gallon USTs in front of the Auto Center building at this time. City of Buena Park Building department records also indicate that there was a fuel dispenser island with four pumps directly west of the Auto Center building which was modified in 1974. None of the public records received included any documentation related to the removal events of the former USTs or fuel dispenser islands.

In 1964, an automotive service station had been developed, which likely refers to the former building south of the Auto Center building. In 1986, a building permit was issued for what is likely the current waste oil AST system in the Auto Center building. The Auto Center also had four paint and solvent spray booths in at least 1959 and three CFC-12 recovery/recycling operations for motor vehicle air conditioning systems in at least 1992In its 2019 Phase I ESA, Roux Associates identified this former presence of USTs and dispenser islands

[9] RGA Environmental, 2012. *Asbestos Inspection Survey Report, Sears Retail Store (#1268) & Sears Auto Center (#6731).* July 12.

at the Auto Center building/former service station as a REC, and conducted soil and soil vapor sampling in this area to assess the associated risk. TPH was detected at a maximum concentration of 93,000 µg/m^3 in the vicinity of the former automobile service station, above the commercial ESL of 83,000 µg/m^3. All other TPH results were below the laboratory reporting limit of 50,000 µg/m^3. However, because the Property may be redeveloped for residential purposes in the future, the residential ESL of 20,000 µg/m^3 must be considered. The maximum TPH concentration detected in Roux's 2019 Phase II is above this residential ESL, and because the laboratory reporting limit was also above this ESL, it is unknown if TPH concentrations at other boring locations exceed the residential limit. Therefore, these 2019 sampling results at the Auto Center represent a REC for the Property.

Roux Associates also identified the historical on-Property dry cleaners as a REC, and advanced three soil borings in its assumed former location during its Phase II investigation. No exceedances were detected for these samples, however, the laboratory detection limit of 100 µg/m^3 was above the residential cancer risk ESLs of 15 µg/m^3 for PCE and 16 ug/m^3 for TCE. A potential historic release could have caused elevated levels of CVOCs in the location of this facility that these 2019 samples would not have detected, and it was unknown if the residential cancer risk value was exceeded. Therefore, these 2019 sampling results at the former on-Property dry cleaners represented a potential concern for the Property. Roux Associates conducted additional investigation at this former on-Property dry cleaner in order to address this potential concern , detailed further in Section 8.

6. Property History Summary

The Property has been bounded by roads to the north and west (present-day La Palma and Stanton Avenues) since at least 1896. The Property was formerly used for agriculture, specifically orchards, beginning in at least 1928. Within the orchards, a small building was located in the northeast portion of the Property between at least 1938 and 1942. By 1959, the orchards were removed, and the Property was developed with the current Sears Department Store building and Auto Center building.

Historically, the Property also included a second auto center building directly south of the current Auto Center building between approximately 1989 and 2002. A dispenser island with four pumps existed to the west of the northern Auto Center building between at least 1962 and 2002, which was modified from four to two islands in 1974. By 2005, the second auto center building and the dispenser islands, as well as several other small buildings on the Property, were demolished and replaced with paved parking areas.

A 1958 building permit for a “service station” indicates that these USTs and fuel dispensers may have existed since the Auto Center building was developed, around 1959. USA Petroleum, a possible service station, is listed as a tenant for the Property in 1980. Additionally, a 1974 figure from City of Buena Park records indicated the presence of three 10,000-gallon underground petroleum storage tanks in front of the Auto Center building at the time. In 1988, seven gasoline USTs were removed from directly north of the Auto Center and six soil samples were collected from the excavation pit. No other information regarding the former USTs was identified during this Phase I ESA, and analytical results for the soil samples were not reported. By 2005, the dispenser islands, which appear to have existed in some form since at least 1962, were removed, and no information regarding their removal was identified during this Phase I ESA.

In 1985, a Sears dry-cleaning facility is listed in the city directory for the Property. Dry-cleaning facilities historically handled large volumes of chlorinated solvents with the potential for releases into subsurface soil and groundwater with a risk of volatilization into soil vapor. Roux Associates identified this facility as a REC in its 2019 Phase I ESA, and advanced three soil borings at this location as part of its Focused Phase II. A soil vapor sample was collected at each boring. No exceedances were detected, but the laboratory detection limits for PCE and TCE were higher than the residential cancer risk environmental screening levels, so it was unknown if the residential cancer risk value was exceeded. Therefore, these 2019 sampling results at the former on-Property dry cleaners represented a potential concern for the Property. Roux Associates conducted additional investigation at this former on-Property dry cleaner in order to address this potential concern , detailed further in Section 8.

In 1988, a 500-gallon waste oil AST system and piping were installed at the Auto Center. The Auto Center also had four paint and solvent spray booths in at least 1959 and three dichlorodifluoromethane (CFC-12) recovery/recycling operations for motor vehicle air conditioning systems in at least 1992. The Property has disposed of small quantities of hazardous waste since at least 1985. In 1993, 5.4 tons of contaminated soil from an unspecified site cleanup were off-hauled from the Property. No other information regarding the nature of the cleanup was identified during this Phase I ESA, which is considered a data gap.

Additionally, during redevelopment activities in 2003, battery acid releases from a battery room were discovered and appeared to have been leaking for some time. The location of the battery room and further details of this incident were not identified during this Phase I ESA. The lack of further information regarding a cleanup of the battery leak is considered a data gap as well as a business environmental risk for the Property.

7. Property Reconnaissance

Roux conducted a reconnaissance of the Property on November 16, 2021. Roux was accompanied by the Property Manager, Annette Gens. The objective of the reconnaissance was to check for visual evidence of past/present use or storage of hazardous materials that could potentially affect the soil, groundwater, soil vapor, or surface water quality at the Property. Photographs taken during reconnaissance are provided in Appendix H and described below.

The Property consists of approximately 25 acres and is currently improved with a 227,503 square-foot vacant Sears Department Store building, detached House of Imports Service Center building, and paved parking areas. (Appendix H, Photographs 1 through 32).

At the time of Property reconnaissance, the Property consisted of the following:

- A vacant Sears Department Store building (Appendix H, Photographs 1-13) which was connected along the eastern border of the Property to Buena Park Downtown Mall. The loading dock was occupied by a truck storage lot (Appendix H, Photograph 32).
- A House of Imports Service Center, (Appendix H, Photographs 14-29) which was located in the western portion of the Property (note that this building was formerly used as an automobile repair facility); and
- Associated parking areas (Appendix H, Photographs 30-32).

A portion of the Property parking area was used by Tesla to store vehicles (Appendix H, Photograph 31) and used as storage for an inactive haunted house (Appendix H, Photograph 30).

The Auto Shop building operates an oil water separator (OWS), above-ground hydraulic lifts with lift cylinders that extend into the basement level, and compressors.. During the reconnaissance, staining was observed in the basement of the Auto Shop building beneath the hydraulic lifts and associated hydraulic fluid tanks.

7.1 Utilities

Southern California Edison provides the electricity, Southern California Gas Company provides the natural gas, and the City of Buena Park provides the water for the Property.

7.2 Hazardous Substances

Air conditioning and cooling tower chemicals (containers ranging from approximately 20 to 55 gallons in capacity) were observed in the air conditioning equipment room of the main vacant Sears department basement including refrigerant and water softener (Appendix H, Photograph 10). No signs of staining, damaged equipment, or drains were observed in the vicinity of the chemicals. Staining near or towards floor drains was observed coming from the air conditioning equipment (Appendix H, Photograph 6-7). The air conditioner was shut off on November 16, 2021 due to lack of occupants in the vacated Sears building.

One compressor was observed in the air conditioning equipment room in the Sears Department Store basement (Appendix H, Photograph 9). No significant signs of a release such as staining, or floor drains were observed in the area around the compressor.

The Sears Department Store building was equipped with three elevators: one passenger elevator and two freight elevators (Appendix H, Photographs 11-13). The elevators have not been in-use since Sears vacated the property in February 2020. One freight elevator is operational, and one is currently out-of-service. No issues with leaking hydraulic fluid was reported by onsite Sears personnel. The installation date of the elevators is unknown, onsite personnel reported that all three elevators may have been installed in the 1980s. No signs of significant staining were noted in the vicinity of the equipment for the elevators. Hydraulic oil used in elevators and similar applications prior to 1979 was sometimes found to contain PCBs and/or TPH Based on the installation date of the elevators and the age of the Property buildings, hydraulic oils containing PCBs and/or TPH may have been used in the equipment, therefore the on-site elevator equipment represents a *de minimis* condition.

One out-of-commission compressor was located in a shed located on the roof of the vacant Sears Department Store building. No sign of significant staining was observed in the vicinity of the compressor.

The following hazardous substances were observed within the House of Imports Service Center building which is an auto repair shop:

Hazardous Substance	Approximate Container Size	Number of Containers	Location	Secondary Containment
New Motor Oil	500 Gallons	1	House of Imports Service Center	Yes
New Motor Oil	350 Gallons	1	House of Imports Service Center	Yes
New Motor Oil	55 Gallons	5	House of Imports Service Center	No
Mobile Waste Oil Collection Units	30 Gallons	7	House of Imports Service Center	No
Oily Waste Can	5 Gallons	1	House of Imports Service Center	No
Hazardous Waste – Light Bulbs	5 Gallons	1	House of Imports Service Center	No
Hazardous Waste – Batteries	5 Gallons	1	House of Imports Service Center	No
Sorbent Waste	55 Gallons	2	Outside of House of Imports Service Center	No
Used Break Fluid	55 Gallons	1	Outside of House of Imports Service Center	No
Motor Oil	55 Gallons	1	Outside of House of Imports Service Center	Yes

Hazardous Substance	Approximate Container Size	Number of Containers	Location	Secondary Containment
Break Cleaner	55 Gallons	1	Outside of House of Imports Service Center	No
Paper Filters	55 Gallons	2	Outside of House of Imports Service Center	No
Metal Filters	55 Gallons	2	Outside of House of Imports Service Center	No
Compressed Gas Tanks - Empty	30 Gallons	12	Basement of House of Imports Service Center	No

In addition to the materials listed above, numerous unopened small containers (up to one gallon) were observed in Auto Center building including new oil, power steering fluid, battery cleaner, engine cleaning detergent, and coolant/antifreeze (Appendix H, Photographs 14-16). Near the outdoor drum storage area, several empty one-quart bottles of synthetic motor oil were piled next to the drums (Appendix H, Photograph 26). Significant areas of staining were observed throughout the House of Imports Service Center building and surrounding both drum storage areas.

One compressor was observed on the ground level of the House of Imports Service Center building. The area around the equipment had significant indications of staining. Evidence of an oil water separator (OWS) was located near the northwestern corner of the basement; however, drains appear to have been sealed and the OWS was not operational. The OWS has three chambers. No documents were available onsite pertaining to the most recent time that the clarifier was cleaned out.

Two compressors were observed in the House of Imports Service Center basement. Signs of staining were observed around the base of the compressors (Appendix H, Photograph 28).

Equipment from approximately eighteen (18) below-ground hydraulic lifts was observed in the basement of House of Imports Service Center building (Appendix H, Photographs 22-25). Only approximate four lifts appeared to be operational. The hydraulic lifts extend into the basement of House of Imports Service Center building; however, they did not appear to extend into the ground below the basement. Hydraulic fluid storage tanks for each of the approximately 18 lifts were observed in the basement with piping extending to the basement ceiling to provide fluid to the lifts. Several of the tanks piping appeared to be disconnected and no longer in use. Staining was observed around the base of several of the hydraulic fluid containers as well as around the base of several of the lifts (Appendix H, Photographs 22-25). House of Imports Service Center personnel were unaware of the installation date of the hydraulic lifts. Observations on the ground-level indicate that only approximately four below-ground lifts were operational at the time of Property reconnaissance. Several above-ground lifts were also observed to be operational. Onsite personnel had no knowledge of when the remaining below-ground hydraulic lifts were removed from the Property. As noted above, hydraulic oil used in lifts and similar applications prior to 1979 was sometimes found to contain PCBs and/or TPH.

New and waste automotive batteries were observed in the House of Imports Service Center building, on the ground level. No signs of significant staining or corrosion were observed in the vicinity of the automotive batteries.

Several containers of commercial janitorial cleaning chemicals (up to five gallon in size) were observed in the House of Imports Service Center building. No sign of significant staining was observed in the vicinity of the cleaning chemicals.

7.3 Polychlorinated Biphenyls

Roux observed several floor- and pad-mounted transformers in the Vacant Department Store building, primarily in the basement. These interior transformers appear to be dry-type transformers. The interior transformers were observed to be in generally good condition with no visual staining observed in the vicinity.

The hydraulic elevators are located in the Department Store building. Below-ground hydraulic lifts are present in the Auto Center building.

7.4 Staining and Stressed Vegetation

Small areas of staining were observed throughout the parking areas of the Property. The staining appears to be from leaking parked vehicles and is likely surficial in nature. Based on the small size and the apparent surficial nature of the staining, it is not expected to represent a significant environmental impact.

7.5 Drains and Sumps

Drains located in the loading area south of the main vacant Sears Department Store building are equipped with two sump pumps. The sump pumps are reportedly currently out-of-service. No hazardous materials were observed in the area.

The main Sears Department Store structure was equipped with a septic sump/tank for domestic waste (Appendix H, Photograph 8). Equipment for the sump was observed in the maintenance area of the basement. A mild sewage odor was observed in the area of the septic equipment. No hazardous materials or staining were observed in the immediate vicinity of the equipment.

7.6 Solid Waste

No dumpsters were found on the Property other than the refuse containers. A pile of empty synthetic motor oil containers were piled behind the House of Imports Service Center.

No hazardous materials or signs of illegal dumping were observed in these areas.

7.7 Wastewater

Refer to Section 6.2 and 6.5 above for discussion of wastewater discharge systems.

7.8 Wells

No oil/gas wells or groundwater monitoring wells were observed on the Property during reconnaissance.

7.9 Other

No data gaps were identified during the Property reconnaissance.

8. Limited Phase II ESA

Per the 1985 City Directory, a Sears dry-cleaning facility was suspected to exist on the Property at that time. However, the exact location of the former dry-cleaning facility within the Sears retail building is unknown and no additional documentation for the dry-cleaning facility was identified through the document review process.

To address the environmental concern presented by this former on-Property dry cleaners, Roux conducted a limited Phase II investigation in December 2021. This limited Phase II investigation consisted of the installation and sampling of three soil vapor probes at 5 feet below ground surface. This section summarizes the December 2021 soil vapor sampling event and findings. The scope of work was developed to assess concentrations of volatile organic compounds (VOCs) in soil vapor underneath the former Sears department store.

Soil vapor sampling was conducted in general accordance with the July 2015 California Environmental Protection Agency (CalEPA), Department of Toxic Substances Control (DTSC), the Los Angeles Regional Water Quality Control Board, the San Francisco Regional Water Quality Control Board Active Soil Gas Investigations Advisory and the February 2020 CalEPA, DTSC, California Water Resources Control Boards Draft Supplemental Guidance: Screening and Evaluating Vapor Intrusion (Draft Supplemental Guidance).

The following sections summarize the investigation methods that were used during the sampling event, including pre-field activities, sampling locations and procedures, and field observations.

8.1 Pre-Field Activities

All fieldwork associated with the investigation was performed in accordance with the Site-specific Health and Safety Plan (HASP). The HASP identified the potential physical and chemical hazards at the Site that could present a threat to workers and other Site users while performing the work. Field workers acknowledged their familiarity with all safety procedures and indicated their intent to follow the HASP by signing the HASP after the tailgate safety meeting, which took place at the beginning of each field day. The field work was completed without health and safety incidents of any kind.

8.2 Sub-Surface Utility Clearance

Roux marked the Site with white paint and notified Underground Service Alert (USA) of Southern California, for a DigAlert Ticket (B213420756-00B). Notification was given to USA at least two business days in advance of intrusive subsurface work to identify potentially buried utility lines (e.g., natural gas, electric, water, sewer, telephone, fiber optic, etc.) situated within the bounds of the Site. Roux also contracted with Ground Penetrating Radar Systems, LLC (GPRS) of Los Angeles, California to perform a private geophysical investigation within the former Sears department store to locate potentially buried utility lines or other subsurface features. On December 14, 2021, GPRS cleared the proposed locations prior to intrusive work.

8.3 Soil Vapor Probe Installation

On December 14, 2021, Cascade Drilling of Santa Ana, California (C-57 License #1069034), under the direction of Roux, advanced three soil borings at the Site (SV2021-1 through SV2021-3) and installed temporary soil vapor probes at five feet below ground surface in each boring. All borings were advanced using a hand auger and soil was logged continuously in a manner consistent with the Unified Soil

Classification System for materials, color, moisture and other pertinent geological observations. Boring logs are provided in Appendix I. Drilling equipment was cleaned in a solution of laboratory-grade detergent and rinsed with distilled water between boring locations.

8.4 Soil Vapor Sampling

Roux sampled the three soil vapor probes on December 20, 2021, after more than 48 hours of equilibration time. Prior to purging or sampling, a minimum 60-second shut-in test at a vacuum of 100 inches of water was performed at each probe to confirm that the above-ground lines and valves were properly sealed. Upon successful completion of the shut-in test, three purge volumes of stagnant air were subsequently extracted from the sampling system with a Gil Air Gillian 5000 air pump at a flow rate of 200 milliliters per minute (mL/min). Roux used batch certified, 1-liter SUMMA® canisters equipped with 200 mL/min flow controllers to collect the soil vapor samples, which were transported under proper chain of custody to Enthalpy Analytical in Orange, California for VOC analysis by United States Environmental Protection Agency (USEPA) Test Method TO-15. During purging and sampling, 1,1-difluoroethane was used as a gaseous leak check compound (LCC). The LCC was applied adjacent to the soil vapor probe and sample train connections for detection of potential leaks in the sampling system. Soil vapor probes were subsequently abandoned and the boreholes were backfilled with hydrated bentonite and sealed at the surface with concrete, flush with the building slab.

8.5 Soil Vapor Sampling Results

The soil vapor sampling results are summarized in Table 1. The laboratory report is provided in Appendix J. Soil vapor screening levels (SLs) were calculated per the Draft Supplemental Guidance, applying an attenuation factor of 0.03 to the DTSC Human and Ecological Risk Office Human Health Risk Assessment Note 3 SLs for Commercial/ Industrial and Residential Air, dated June 2020.

No VOCs were detected at concentrations exceeding the SLs for Commercial/ Industrial or Residential Air. Reporting limits were below the DTSC Commercial/ Industrial and Residential SLs for all compounds.

8.6 Soil Vapor Sampling Conclusions and Recommendations

Concentrations of VOCs detected in soil vapor at all three sampling locations underneath the former Sears department store were less than the DTSC Commercial/ Industrial or Residential SLs. The results of this limited Phase II ESA resolve the potential concern related to the suspected former dry cleaning facility. No additional sampling is recommended.

9. Phase I And Limited Phase II Conclusions

Roux performed a Phase I ESA for the Property on behalf of the User. The Property comprises approximately 25 acres in Buena Park, California and is currently improved with a 227,503 square-foot one-story Sears Department Store building, detached 13,360 square-foot one-story Auto Center building that is currently operational, and paved parking areas. The surrounding area is mixed residential and commercial.

This Phase I ESA was performed in general accordance with ASTM Standard Practice E1527-13 on behalf of Merlone Geier Partners (MGP, User), and was performed to identify Recognized Environmental Conditions (RECs), controlled RECs (CRECs), and/or historical RECs (HRECs) at the Property, indicating past, current, or material threats of the release of hazardous materials or petroleum hydrocarbons to the Property's soil, groundwater, soil vapor, or surface water. This Phase I ESA was conducted by investigating past Property uses, reviewing the results of a search of environmental databases, reviewing records at relevant government agencies, and performing a reconnaissance of the Property and surrounding area.

The Property was formerly used for agriculture, specifically orchards, beginning in at least 1928. By 1959, the orchards were removed, and the Property was developed with the current Sears Department Store building and Auto Center building. A dispenser island with four pumps existed to the west of the northern Auto Center building between at least 1962 and 2002, which was modified from four to two islands in 1974. In 1988, seven gasoline USTs were removed from directly north of the Auto Center. A former Sears dry-cleaning facility was known to have formerly existed on the Property in 1985 as well. One investigation has been completed to date on the Property, Roux Associates' 2019 Phase I and Focused Phase II ESA, for which sampling was conducted in the Auto Center and former Sears building.

The following RECs were identified during the Phase I ESA.

- Former and Current on-Property Auto Repair Facility, Including Former USTs and Dispenser Islands: An automobile repair facility has been present on the Property since at least 1959. Underground storage tanks were present in front of the Auto Center building between at least 1959 and 1988. In 1974, there were three 10,000-gallon USTs and in 1988, seven USTs of unknown size were removed. Additionally, dispenser islands were located west of the Auto Center building, likely between 1962 and 2002. During the Property reconnaissance, significant staining was observed at several locations in the Auto Center basement, including in the vicinity of compressors, hydraulic fluid containers, and hydraulic lifts. In Roux Associates' 2019 Focused Phase II ESA, three soil samples and three soil vapor samples were collected from the basement of the Auto Center and the vicinity of the former USTs. TPH was detected at a maximum concentration of 93,000 µg/m^3 in the Auto Center, above the residential ESL of 20,000 µg/m^3. Although exceedances were not detected for the other samples, the laboratory screening limit of 50,000 µg/m^3 was above the residential ESL, so it is possible that TPH was present at concentrations above the residential screening level but below the laboratory screening limit in the 2019 samples. In addition, the current operation at this facility operates an oil water separator (OWS), above-ground hydraulic lifts with lift cylinders that extend into the basement level, and compressors.. During the reconnaissance, staining was observed in the basement of the Auto Shop building beneath the hydraulic lifts and associated hydraulic fluid tanks. This facility is therefore considered a REC for the Property.
- Potential Historical on-Property Pesticide Use: The Property was used for orchards between at least 1928 and 1959, during which time pesticides and/or herbicides may have been used. This potential historical pesticide usage may have caused impacts to shallow soil. If the Property is to be redeveloped for residential purposes in the future, this would be considered a REC.

No CRECs or HRECs were identified during the Phase I ESA.

A *de minimis* concern is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* conditions are not RECs, CRECs, or HRECs. The following *de minimis* conditions were identified:

- Past and present use, storage, and disposal of hazardous materials used in the ordinary course of business located at the Property and surrounding areas.
- Minor staining was observed in the vicinity of a hydraulic elevator near a floor drain, located in the main Sears Department Store building. Based on the installation date of the elevators and the age of the Property buildings, hydraulic oils containing PCBs and/or TPHs may have been used in the equipment, therefore the on-Site elevator equipment represents a *de minimis* condition.

A data gap is a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. The following data gaps were identified during the Phase I ESA.

- Documentation regarding the removal of seven gasoline USTs in 1988, including inspection and approval records, sampling protocol, and soil sample results were not identified during this Phase I ESA. Based on the possibility of a former release that could have been identified during the removal, the lack of documentation for this event is considered a significant data gap.
- Documentation regarding the removal of dispenser islands which occurred at some point between 2002 and 2005 was not identified during this Phase I ESA. Based on the possibility of a former release that could have been identified during the removal, the lack of documentation for this event is considered a significant data gap.
- Documentation regarding the cleanup of 5.4 tons of contaminated soil in 1993, including the nature of the contamination, was not identified during this Phase I ESA and is considered a data gap.
- Documentation regarding the potential cleanup of a battery acid release in a battery room in 2003 was not identified during this Phase I ESA and is considered a data gap.

Based on the findings of this Phase I ESA, Roux recommends that the RECs be further investigated during redevelopment after the existing buildings are demolished.

10. Report Assumptions and Limitations

The Phase I ESA described herein was conducted by Roux in accordance with ASTM Standard Practice E1527-13, which is consistent with the regulatory requirements for conducting all appropriate inquiries (40 CFR Part 312, Standards and Practices for All Appropriate Inquiries; Final Rule). The preamble for the AAI Rule states:

> *In today's final rule, EPA is referencing the standards and practices developed by ASTM International and known as Standard E1527-05 (entitled "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process") and recognizing the E1527-05 standard as consistent with today's final rule. The Agency determined that this voluntary consensus standard is consistent with today's final rule and is compliant with the statutory criteria for all appropriate inquiries. Persons conducting all appropriate inquiries may use the procedures included in the ASTM E1527-05 standard to comply with today's final rule.*

This AAI Rule was subsequently amended in 2013, as indicated in the following "Background":

> *With today's action, EPA is establishing that parties seeking liability relief under CERCLA's landowner liability protections, as well as recipients of brownfields grants for conducting site assessments, will be considered to have met the standards and practices for all appropriate inquiries, as set forth in the Brownfields Amendments to CERCLA and 40 CFR Part 312, if such parties follow the procedures provided in the ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process." EPA made this determination based upon the Agency's finding that the ASTM E1527-13 standard is compliant with the All Appropriate Inquiries Rule. Therefore, parties conducting all appropriate inquiries may use the procedures in the newly issued ASTM E1527-13 standard when conducting all appropriate inquiries.*

It is Roux's understanding that this Phase I ESA was requested so that MGP may qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). One of the requirements that a person acquiring real property must meet in order to qualify for one of these limitations on liability under CERCLA is to perform all appropriate inquiries in conformance with the AAI Rule (or the ASTM Standard Practice E1527-13) prior to the acquisition of the property. The User and MGP haveacknowledged that, under the AAI Rule, Roux's performance of the Phase I ESA described herein will not alone result in MGP satisfying all of the requirements of the AAI Rule and provide a defense to CERCLA liability. Further, the User and MGP have acknowledged that the AAI Rule requires that certain additional inquiries be undertaken to satisfy the CERCLA AAI requirements. Accordingly, Roux makes no guarantees or warranties, expressed or implied, regarding this Phase I ESA, including without limitation, any warranty that this Phase I WSA will in fact qualify MGP for a defense to CERCLA liability.

Roux has performed this Phase I ESA in a professional manner using that degree of skill and care exercised for similar projects under similar conditions by reputable and competent environmental consultants. Professional judgments expressed herein are based on the facts currently available to Roux.

The AAI Rule requires, and the conclusions stated herein represent the application of a variety of engineering and technical disciplines to material facts and conditions associated with the Property. As such, these conclusions are based on subjective interpretations and the exercise of discretion. Many of these facts and conditions are subject to change over time. Accordingly, the conclusions must be considered within this context.

The User and MGP have agreed that Roux shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time the Phase I ESA was performed. To the extent practicable, Roux has identified data gaps and has evaluated the potential significance of such data gaps.

By referencing this information, Roux does not accept responsibility for the accuracy of the underlying reported data.

This Phase I ESA Report should not be considered a legal interpretation of existing environmental laws and regulations. The Phase I ESA was conducted with a reasonable degree of inquiry to identify RECs, but uncertainty is not eliminated. No Phase I ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. The Phase I ESA process is intended to reduce, but not eliminate, the uncertainty involved with identifying RECs.

This Phase I ESA Report is not an appraisal or value judgment of the Property. The User and MGP have agreed that Roux shall not be liable for any use of the Phase I ESA Report as an appraisal or value judgment of the Property.

The Phase I ESA Report has been prepared for the exclusive use of User and MGP for specific application to the Property. The User and MGP have agreed that any third-party use of this Phase I ESA Report, except for use by MGP, is User's and MGP's sole responsibility and at User's and MGP's sole liability.

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

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR 312.

Respectfully submitted,

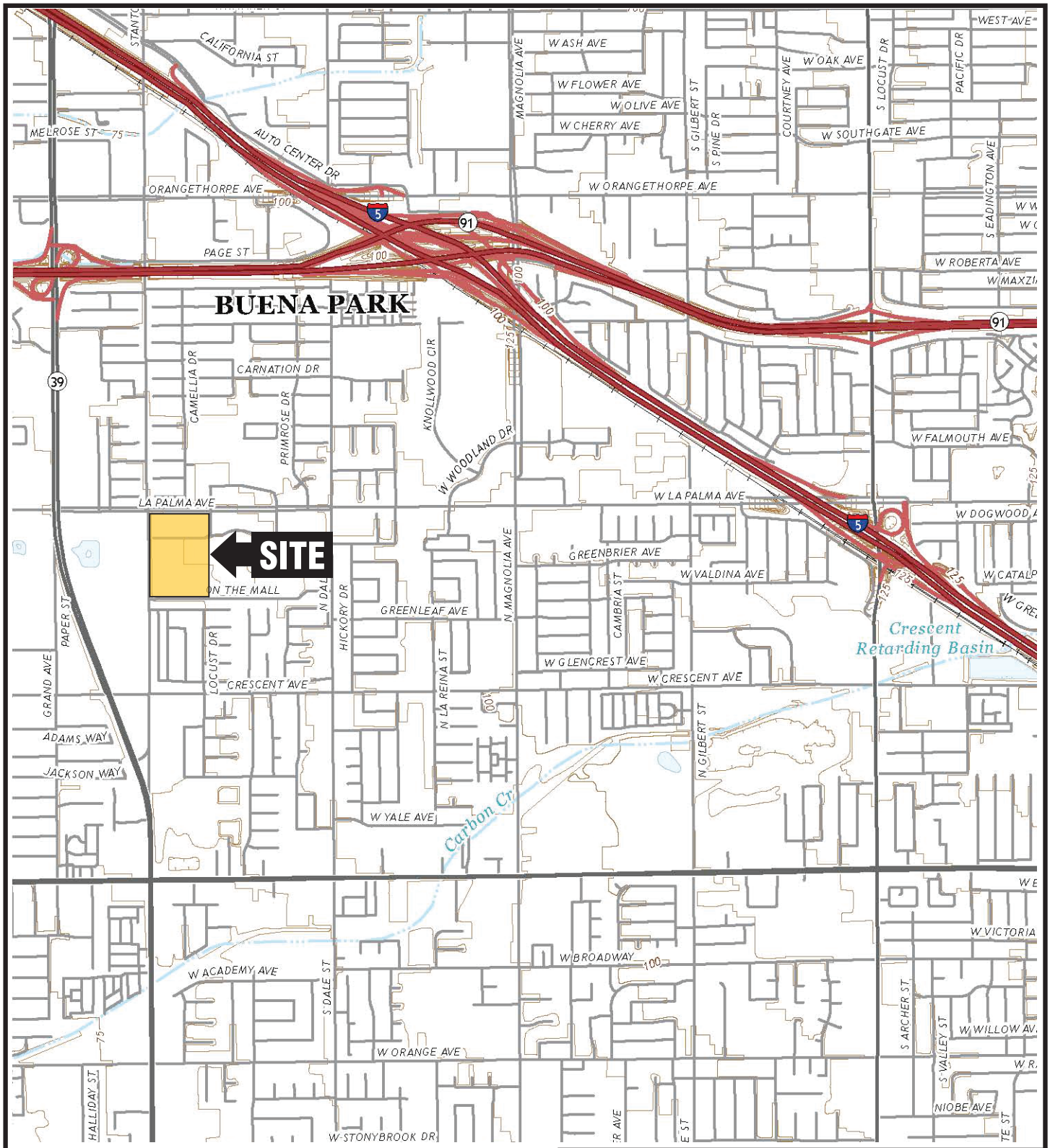
ROUX ASSOCIATES, INC.

Angela Liang Cutting
Principal Engineer

Table 1 - Volatile Organic Compounds in Soil Vapor
8150 La Palma Avenue, Buena Park, CA

Sample Location	Depth (feet bgs)	Date Sampled	Freon 12	Chloromethane	Vinyl Chloride	Trichlorofluoromethane	Acetone	Carbon Disulfide	Isopropanol (IPA)	Methylene Chloride	trans-1,2-Dichloroethene	n-Hexane	cis-1,2-Dichloroethene	2-Butanone	Benzene	Trichloroethene	4-Methyl-2-Pentanone	Toluene	Tetrachloroethene	m,p-Xylenes	o-Xylene	1,1,2,2-Tetrachloroethane	1,2,4-Trimethylbenzene	Xylene (total)
Analytical Method			**USEPA TO-15**																					
Unit			**µg/m^3**																					
DTSC Residential Soil Vapor SL (AF = 0.03)[1]			**NS**	**NS**	**0.32**	**43,333**	**NS**	**NS**	**NS**	**33.3**	**2,767**	**NS**	**277**	**NS**	**3.2**	**67**	**NS**	**10,333**	**15**	**NS**	**NS**	**1.6**	**NS**	**NS**
DTSC Commercial/ Industrial Soil Vapor SL (AF = 0.03)[2]			**NS**	**NS**	**5.3**	**176,667**	**NS**	**NS**	**NS**	**400**	**11,667**	**NS**	**1,167**	**NS**	**14**	**267**	**NS**	**43,333**	**67**	**NS**	**NS**	**7.0**	**NS**	**NS**
SV2021-1	5	12/21/2021	**1.9**	**1.1**	<0.048	**3.1**	**35**	**1.1**	**9.3**	**2.5**	<1.2	**2.6**	<1.2	<4.4	**2.3**	<1.6	<1.2	**7.2**	<2.0	**4.0**	**1.5**	<0.066	**2.0**	**5.5**
SV2021-2	5	12/21/2021	**1.9**	**1.0**	<0.048	**2.3**	**31**	**1.1**	**10**	**1.4**	<1.2	**2.1**	<1.2	<4.4	**2.2**	<1.6	**1.5**	**5.7**	<2.0	**3.6**	**1.4**	<0.066	**1.6**	**5.0**
SV2021-3	5	12/21/2021	**1.9**	**1.1**	**0.11 J**	**3.4**	**46**	**1.6**	**58**	**1.4**	<1.2	**7.2**	<1.2	**5.3**	**2.2**	<1.6	**1.7**	**14**	<2.0	**3.9**	**1.5**	<0.066	**1.8**	**5.3**

Notes:
bgs = below ground surface
USEPA = United States Environmental Protection Agency
AF = attenuation factor
[1] = Values estimated using DTSC Residential Ambient Air SL, dated June 2020, and an AF of 0.03 in accordance with DTSC Supplemental Guidance: Screening and Evaluating Vapor Intrusion, dated February 2020
[2] = Values estimated using DTSC Industrial Ambient Air SL, dated June 2020, and an AF of 0.03 in accordance with DTSC Supplemental Guidance: Screening and Evaluating Vapor Intrusion, dated February 2020
µg/m^3 = micrograms per cubic meter
NS = No standard established
J = Estimated value
Bold indicates that sample exceeds laboratory reporting limit (RL) or method detection limit (MDL) for vinyl chloride and 1,1,2,2-tetrachloroethane
<X = analyte not detected above laboratory RL except vinyl chloride and 1,1,2,2-tetrachloroethane were reported to the MDL
Only analytes detected in at least one sample and select analytes are included in the table



QUADRANGLE LOCATION

N

0 2000'

SOURCE:
USGS; (2018) Anaheim, CA
7.5 Minute Topographic Quadrangle

Title:

SITE LOCATION MAP

8150 LA PALMA AVENUE
BUENA PARK, CALIFORNIA

Prepared for:

MERLONE GEIER PARTNERS

ROUX

Compiled by: M.M.	Date: 10NOV21	FIGURE
Prepared by: B.H.C..	Scale: AS SHOWN	1
Project Mgr: A.L.C.	Project: 2904.0015S000	
File: 2904.0015S100.01.CDR		

\2904S\0015S\100\2904.0015S100.01.CDR

LEGEND

PROPERTY BOUNDARY

N

200’ 0 200’

Title:

SITE PLAN

8150 LA PALMA AVENUE
BUENA PARK, CALIFORNIA

Prepared for:

MERLONE GEIER PARTNERS

ROUX

Compiled by: M.M.	Date: 10NOV21	FIGURE
Prepared by: B.H.C..	Scale: AS SHOWN	2
Project Mgr: A.L.C.	Project: 2904.0015S000	
File: 2904.0015S100.01.CDR		

\2904\S\0015S\100\2904.0015S100.01.CDR

LEGEND

PROPERTY BOUNDARY

SV2021-2 SOIL VAPOR SAMPLING LOCATION

N

200' 0 200'

Title:

SOIL VAPOR SAMPLING LOCATIONS

8150 LA PALMA AVENUE
BUENA PARK, CALIFORNIA

Prepared for:

MERLONE GEIER PARTNERS

ROUX

Compiled by: M.M.	Date: 10NOV21
Prepared by: B.H.C..	Scale: AS SHOWN
Project Mgr: A.L.C.	Project: 2904.0015S000
File: 2904.0015S100.01.CDR	

FIGURE 3

\2904\S\0015S\100\2904.0015S100.01.CDR