

**SUPPLEMENTAL ENVIRONMENTAL SITE
ASSESSMENT
1880 DANIELS STREET
APN 222-25-06
MANTECA, CALIFORNIA**

December 19, 2012

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A report prepared for:

Mr. Mark Houghton
City of Manteca
Building Department
1001 W. Center Street
Manteca, CA 95336

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1880 DANIELS STREET
APN 222-25-06
MANTECA, CALIFORNIA**

December 19, 2012
Kleinfelder Job No: 123381.E01

Prepared by:



Doug Heard, PG No. 7071
Senior Geologist/Project Manager



Reviewed by:



Joseph D. Zilles, P.G., No. 7787
Project Manager

DH:bn

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1 EXECUTIVE SUMMARY

Kleinfelder performed a brief agency review, updated site reconnaissance, Key Site manager interview and limited Phase II soil sampling for selected agricultural chemicals for a 12.13 acre parcel located at 1880 Daniels Street (Site). This environmental work was done to supplement a former Phase I Environmental Site Assessment (ESA) conducted by Kleinfelder in 2005. This environmental assessment was conducted for approximately 12 of the original 16 acre site for which the prior ESA was performed.

The Site was primarily vacant and fallow land with recent utilities for future commercial development and a large commercial sign. The Site was relatively flat with some miscellaneous concrete and gravel debris.

Based on a limited agency review, no nearby offsite properties/facilities were noted within a ½ mile radius from the Site and no records were identified for the Site address by the local health department. Based on this limited agency search, no new information was obtained to conclude that a recognized environmental condition (REC) was present for the Site or from nearby offsite properties/facilities.

Five shallow soil samples were collected at the Site and submitted to an accredited laboratory for organochlorine pesticides (OCPs) analyses. The shallow soil sampling results were found to be below laboratory reporting limits for the OCP suite. Based on these results, it appears OCPs are not present above reporting limits in near-surface soil from past agricultural practices at the locations sampled. Kleinfelder therefore does not recommend additional soil sampling for OCPs.

In summary Kleinfelder's environmental assessment has not revealed additional RECs for the Site or significant variation from the former ESA findings relevant to the current Site.

This executive summary and report are subject to the limitations in Section 8.

2 INTRODUCTION AND BACKGROUND

The following is an introduction into the purpose of this report, activities conducted, a brief background of a former Phase I ESA conducted in 2005 and the report outline:

The purpose of this assessment is to provide updated environmental information for this former ESA and assist the client in evaluating RECs at the Site. A REC is defined by the American Society for Testing and Materials (ASTM) standard as “the presence or likely presence of hazardous substances or petroleum products under conditions that indicate a release into structures on the property or into the ground, groundwater or surface water of the property.” Kleinfelder performed a brief background review from the State of California’s Water Resource Control Boards (SWRCB) GeoTracker Website, an updated site reconnaissance, Key Site manager interview and limited Phase II soil sampling for selected agricultural chemicals including organochlorine pesticides. This former Phase I ESA was conducted in general accordance with the scope and limitations of the ASTM; *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527-00)* and *Lowes Development Criteria for Phase I assessments for Real Estate Transactions dated February 1, 2001, revised November 5, 2003.*

The former ESA was conducted for a 16-Acre Parcel including the Site which was titled “Phase I Environmental Site Assessment, Approximately 16 Acres, Proposed Lowe’s, Manteca, California,” (File No 60058.P01), dated September 22, 2005. This current assessment is for approximately 12.13 acres (APN 222-25-06) of the original 16-acre property. The western portion of the prior site is no longer a part of the Site and currently includes a McDonalds restaurant (APN 222-25-05), two vacant/fallow parcels (APN 222-25-08/09) and an elongated parcel making up about half of the asphalt entrance driveway (APN 222-25-10, [See APN Map Appendix A]). This former ESA also included a Preliminary Wetland and Threatened and Endangered Species Evaluation for the Site, which this environmental assessment does not address. Section 6 includes a summary of findings and conclusions from this former ESA with updates.

Report Format

The following sections describe Kleinfelder's scope of work.

- Section 3, **Site Setting and Agency Review**, is a compilation of information concerning the site's location, physical setting, geologic and hydrogeologic conditions and findings from a limited agency research.
- Section 4, **Site Reconnaissance and Interview**, describes Kleinfelder's Site observations during the Site reconnaissance and observations of adjacent parcels. This section includes an interview conducted by Kleinfelder with a Key Site Manager knowledgeable about the Site.
- Section 5, **Phase II Assessment**, Kleinfelder conducted Phase II soil sampling to address potential organochlorine pesticide concentrations from former agricultural operations noted in the ESA conducted in 2005.
- Section 6, **Findings and Conclusions**, is a summary of the former ESA findings followed by updates from information in Sections 3 through 5, and presents our opinion regarding the presence of RECs at the Site.
- Sections 7 and 8 present our **Limitations and References**, respectively.

Pertinent documentation regarding the Site is included in Appendices A and B.

3 SITE SETTING AND AGENCY REVIEW

The following presents Site conditions and an overview of potential offsite sources of concern based on the SWRCB GeoTracker database.

3.1 SITE SETTING

The Site location is presented on Plate 1 (Site Vicinity Map) and Plate 2 (Site and Sample Location Map). Tables 1 through 4 describe the physical characteristics of the Site and bordering properties.

The information presented in Table 1 describes the physical location of the Site. This information was obtained from maps, public records, interviews and a Site visit.

**TABLE 1
SITE SETTING**

ASSESSOR'S PARCEL NUMBER AND ADDRESS	APN 222-25-06 San Joaquin County California
LOCATION	1880 Daniels Street, Manteca, California
TOWNSHIP & RANGE	Section 6, Township 2 South, Range 7 East
ACREAGE	Approximately 12.13 acres
CURRENT USE	Fallow Land
PROPOSED USE	Commercial/Industrial

Table 2 presents information about the physical setting of the Site. This information was obtained from published maps and the former ESA.

**TABLE 2
PHYSICAL SETTING**

INFORMATION SOURCES	MAP/UNIT NAME	SUMMARY
USGS TOPOGRAPHIC QUADRANGLE	State of California Department of Water Resources. Manteca, CA Quadrangle, 15-Minute Series, photorevised 1987. Scale: 1 inch = 2,000 feet.	The elevation of the Site is approximately 25 feet above mean sea level (msl). The Site is level and depicted as vacant.
GEOLOGIC MAP	Regional Geologic Map Series, San Francisco-San Jose Quadrangle, Map No. 5A, 1991, Scale: 1 inch = 12 miles	The Site and the adjacent properties are shown as members of the Modesto Formation.

Information on the regional geology and hydrogeology is presented on Table 3. This information was obtained from published data and maps, interviews with public agencies knowledgeable about the Site and from previous investigations conducted by Kleinfelder in the vicinity of the Site.

**TABLE 3
REGIONAL GEOLOGY AND HYDROGEOLOGY**

<p>REGIONAL GEOMORPHIC PROVINCE</p>	<p>The Site is in the western part of the Great Valley Geomorphic Province of California. The valley is 400 miles long, 50 miles wide, and comprises approximately 20,000 square miles. The valley has been filled with a thick sequence of marine and nonmarine sediments from the late Jurassic to Holocene. The uppermost strata of the Great Valley represent, for the most part, the alluvial, flood, and delta plains of two major rivers (Sacramento and San Joaquin Rivers) and their tributaries. The valley deposits are derived from the Coast Ranges to the west and the Sierra Nevada to the east. Granitic and metamorphic rocks outcrop along the eastern and southeastern flanks of the valley. Marine sedimentary rocks outcrop along most of the western, southwestern, southern, and southeastern flanks; and volcanic rocks and deposits outcrop along the northeastern flanks of the valley. The valley geomorphology includes dissected uplands, low alluvial plains and fans, river flood plains and channels, and overflow lands and lake bottoms.</p>
<p>DEPTH TO GROUNDWATER (Source: San Joaquin County Flood Control & Water Conservation District (SJCFC&WCD) Groundwater Report, Figure 3-35: Lines of Equal Depth to Groundwater, Fall 2011 map.</p>	<p>Depth to groundwater was noted at a depth of approximately 15 feet below ground surface (bgs) in the Site area based on the noted SJCFC&WCD map.</p>
<p>GROUNDWATER FLOW DIRECTION Source: SJCFC&WCD Groundwater Report, Figure 3-33: Lines of Equal Elevation to Groundwater, Fall 2011 map.</p>	<p>This SJCFC&WCD map indicated a groundwater flow direction to the northwest. Groundwater depth and flow direction may be influenced by local pumping, rainfall, and irrigation patterns. Evaluation of such factors is beyond the scope of this assessment.</p>

A brief drive-by survey of the parcels adjacent to the Site was conducted on the same day as the Site reconnaissance, November 19, 2012. A summary of the surrounding properties is presented on Table 4.

**TABLE 4
SURROUNDING PROPERTIES**

NORTH	Daniels Street and residential housing.
SOUTH	Highway 120 beyond which is agricultural fields and residential housing.
EAST	Residential housing.
WEST	Asphalt driveway, vacant fields and McDonalds, beyond which is Airport Way and commercial/industrial development.

3.2 AGENCY REVIEW

Kleinfelder visited and evaluated the SWRCB GeoTracker Website for the Site and nearby offsite properties within approximately ½ mile radius from the Site property and requested files for the Site at the San Joaquin County Environmental Health Department (SJCEHD). The GeoTracker Website was developed so that the SWRCB, regional boards and local agencies could “track and archive compliance data from authorized or unauthorized discharges of waste to land, or unauthorized releases of hazardous substances from underground storage tanks.” No nearby offsite properties/facilities were noted within a ½ mile radius from the Site and no records were identified for the Site address by SJCEHD. Based on this limited agency search, no new information was obtained to conclude a REC for the Site or from nearby offsite properties/facilities.

4 SITE RECONNAISSANCE AND INTERVIEW

Kleinfelder conducted a site reconnaissance on November 19, 2012 to assess and photograph Site conditions. The approximate Site boundaries are shown on Plate 2, and photographs of the Site are presented on Plate 3. In addition Kleinfelder conducted a follow up interview with a Key Site manager familiar with the Site.

4.1 SITE RECONNAISSANCE

The Site consists of approximately 12.13 acres of land which was primarily vacant and fallow land. The Site was relatively flat with some irregular surfacing (small low-lying area and shallow mounding) with evidence of storm water prevention practices including hydro seeding, loose straw, and straw wattles. Several utility drainage vaults with surrounding straw wattles were noted in the southern and southwest portions of the Site. A large commercial sign and associated electrical panel and pad-mounted transformer (PMT) were noted in the southeast corner of the Site. An additional PMT was noted in the northeast portion of the Site.

Miscellaneous concrete and gravel debris were noted in the eastern portion of the Site including an abandoned galvanized power or light pole. Several utility structures were noted primarily near the perimeter of the Site including a storm water filtration unit cover and various vault boxes for future electrical and water utilities. Two relatively large diameter (approximately 12 inches) capped plastic casings were noted near the western Site boundary. Two concrete drive entrance structures were noted along the northern Site boundary. Part of an asphalt entrance driveway appears to be located on northern half of the western Site boundary.

The following Table is a summary of Site observations:

**TABLE 5
SITE OBSERVATIONS**

Exterior observations likely to involve the use, storage, disposal, or generation of hazardous substances or petroleum products.		Observed	Not Observed
	Remarks		
Current Use	Site occupied by a fallow field with recent utilities for future commercial development and a large commercial sign.	X	
Past Use	Agricultural cropland		X
Structures	Storm drain catch basins, concrete drive entrances, asphalt driveway entrance and roadway. Large commercial sign, pad-mounted transformers and electrical water and sanitary sewer utilities. Storm water filtration unit.	X	
Terrain	Primarily level and flat with minor irregularities	X	
Hazardous chemical and petroleum products in connection with known use.			X
Aboveground storage tanks			X
UST			X
Odors			X
Pools of Liquid			X
Drums			X
Hazardous chemical and petroleum products in connection with unknown use.			X
Unidentified substance containers			X
Chemical storage or Agricultural chemical mixing areas			X
Asbestos, lead, PCBs			X
Pits, Ponds, or Lagoons			X
Stained soil or pavement			X
Stressed vegetation			X
Hazardous Waste Storage			X
Solid Waste			X
Waste Water			X
Process Wastewater			X
Wells			X
Dry wells			X
Surface water			X
Storm basins/catch		X	
Storm drains	Several storm drain utility vaults and a vault cover for a storm water filtration unit were noted.	X	
Drains and sumps			X
Septic system			X

Exterior observations likely to involve the use, storage, disposal, or generation of hazardous substances or petroleum products.	Observed	Not Observed
Imported Soil		X
Burned or buried debris		X

The Site was bound by Daniels Road and a cinder block wall along the northern and eastern boundary, respectively, beyond which was single family residential housing. A chain link fence was noted along the southern property line beyond which was a highway off-ramp and Highway 120. Two small vacant fields and a relatively new McDonald's restaurant were noted west of the Site, beyond which was Airport Way and commercial development. The western boundary was not well defined in the field.

4.2 INTERVIEW

Kleinfelder conducted an interview on December 13, 2012 with Mr. Marne Bouillon, who has been a design and construction director for Kitchell Development for the Site over the last 7 years (since 2004). Mr. Bouillon clarified several observations made during the site reconnaissance and was not aware of any hazardous spills or releases at the Site.

Mr. Bouillon stated that storm water prevention practices had been implemented at the Site in September and October of 2012 for disturbed areas due to soil construction activities (associated with the former proposed Lowes) at the Site which included hydro-seeding, application of loose straw and straw wattles around catch basins (utility drain vaults). He noted that most of the utility features at the Site were related to the formerly proposed Lowes Home Improvement Store (Lowes) to be constructed at this Site. Mr. Bouillon commented the proposed use is now office buildings/commercial use. The utility drain vaults were constructed for storm water runoff. Mr. Bouillon noted the Site was disked in May or June of 2012 and that he was unaware of the cause of irregular surfacing noted at the Site. The two plastic casings noted along the western Site boundary were noted as stubbed sanitary sewer casings for future use.

A relatively large "Contech," vault near the southeast corner of the Site was noted as a storm water filtration unit that Mr. Bouillon commented was approximately 17 feet deep. Mr. Bouillon was unaware of the purpose of an abandoned galvanized pole (assumed to be a power/light pole) noted in the eastern portion of the Site. Mr. Bouillon stated that irrigation piping and control structures noted in the prior ESA were removed along the southern property boundary,

and may be cause for the low lying area noted in the southwest corner and southern boundary area. He stated that no transite piping or other asbestos material was noted during removal of this piping or irrigation structures. Mr. Bouillon was not aware of the source of the concrete and gravel debris located in the eastern portion of the Site. Paired utility boxes noted at the Site were noted for electrical and water utilities. Mr. Bouillon stated that the Site was likely used for agricultural purposes in the past.

5 PHASE II ASSESSMENT

Kleinfelder performed a limited Phase II Soil Assessment to assess the potential for the past application of OCPs due to evidence of former agricultural use noted in the prior ESA in 2005.

On November 19, 2012, Kleinfelder collected five discrete soil samples from five locations over the Site's 12.13 acres. The sampling locations were located in approximately equal portions of the Site in an attempt to collect representative soil samples of the Site (see Plate 2). One soil sample was collected from each of the five locations at depths of approximately six inches bgs. Grasses, weeds, and miscellaneous vegetation were removed prior to collecting the discrete soil samples.

Soil samples were obtained by driving a hardened steel core sampler with a slide hammer into the soil at the desired sampling depth. The soil was removed from the core sampler and emptied into new zip lock™ plastic baggies. The sampling equipment was decontaminated between sample locations with a Liquinox™ (laboratory-grade detergent) and potable water wash and a distilled water rinse.

The soil samples were labeled, logged on to a chain-of-custody form, and immediately stored in an iced cooler. The samples were transported under chain-of-custody control to Kleinfelder's office and then transported in a chilled ice chest to California Laboratory Services (CLS) of Sacramento, California. CLS is accredited by the State of California Department of Health Services (DHS) to perform the requested analyses.

The five soil samples submitted to the laboratory and were analyzed for OCPs by EPA Method 8081A. The shallow soil sampling results were found to be below laboratory reporting limits for the 8081A suite.

Based on these results, it appears OCPs concentrations from the EPA 8081A suite from past agricultural practices are not present at or above reporting limits in near-surface soil at the locations sampled. OCPs have been recognized to be persistent, typically present in shallow soil, and attenuate rapidly with depth when found. Based on this data and information, Kleinfelder does not recommend additional soil sampling for OCPs.

If unusual odors or discolored soils are encountered, additional investigation may be necessary, and a qualified environmental profession should be contacted for further consultation.

6 FINDINGS AND CONCLUSIONS

6.1 FINDINGS

The following is a summary of conclusions and recommendations from the previously referenced 2005 Phase I Report which included the Site area (APN 222-25-06) and four currently subdivided parcels no longer considered part of the Site (APNs 222-25-07, -08, -09 and -10). Kleinfelder has included italicized responses and current findings for the numbered findings below based on this supplemental environmental assessment, followed by a brief summary discussion:

1. On properties with a history of agricultural use, many underground pipelines may exist. It was common for said pipelines to contain asbestos (e.g. Transite pipe). Subsurface exploration is not a part of a typical Phase I Environmental Site Assessment scope of work. In the event that any subsurface structures are encountered during site development or excavation on site, care should be exercised in determining whether or not the subsurface structures contain asbestos. If they contain asbestos, they should be removed, handled, transported, and disposed of in accordance with local, state, and federal laws and regulations. Additionally, if suspect materials are encountered, the signatories of this report should be notified. *Although irrigation piping has reportedly been removed along the southern boundary of the Site, this original finding remains the same since additional historical subsurface piping may still be present.*
2. Due to the historical agricultural use of the site it is possible that environmentally persistent pesticides may have been applied to the site. Kleinfelder recommends soil sampling and analysis for potential residual organochlorine pesticides. *Kleinfelder conducted limited shallow soil sampling to address this finding (see Section 5). Kleinfelder's soil sampling results for OCPs were below laboratory reporting limits and therefore it appears OCPs are not present above reporting limits in near-surface soil from past agricultural practices at the locations sampled. OCPs have been recognized to be persistent, typically present in shallow soil, and attenuate rapidly with depth when found. Based on this data and information, Kleinfelder does not recommend additional soil sampling for OCPs.*
3. A marker for a PG&E subsurface gas pipeline was noted in the southwest corner of the site. PG&E pipelines would not usually be expected to adversely impact the subject site unless leaks occurred and were not addressed by PG&E. However evaluation of natural gas pipeline hazards (such as explosion hazards) is beyond the scope of this report. *This appears to be an observation that is currently offsite, in addition no PG&E subsurface gas pipeline was noted in the southwest corner of the current Site. However this finding remains the same for the Site.*
4. Subsurface utility lines were noted trending along the northern border of the site. No staining, evidence of leakage, stressed vegetation, or odors were observed and the utilities are not currently expected to have an adverse impact on the site. *This finding remains the same for the Site.*

5. A pad-mounted transformer was noted on the northern border of the site. Soil stains and a petroleum odor were noted adjacent and north of the transformer. The staining appeared "deminimus" per the ASTM standard and does not appear to pose an environmental concern. *No staining was noted associated with PMTs noted on the Site. This finding remains the same for the Site.*
6. Soil piles were noted trending along the northern border of the site. The soil piles appear to be native material associated with the installation of the subsurface utilities. *No soil piles were noted at the Site during the site reconnaissance. It is possible the initial soil piles were spread over the Site from disking and subsequent soil disturbance activities conducted since 2005. No additional information was obtained in this assessment that would indicate this finding is a REC for the Site*
7. Two pits and associated soil piles are located in the northwest corner of the site. According to the onsite contractors, the pits are associated with the installation of the subsurface utilities. No staining, leakage or stressed vegetation was noted in association with the pits or the associated soil piles. The pits and associated soil piles are not currently expected to have an adverse impact on the site. *This appears to be a past observation that was not within the current Site boundary. In addition no pits or soil piles were noted at the current Site. This former finding is not evaluated as a REC for the Site.*
8. A storage shed and trailer are located in the northeast corner of the site. The storage shed was locked at the time of Kleinfelder's site reconnaissance. The contents of the shed should be characterized and any petroleum products and/ or hazardous materials encountered should be disposed of or recycled in accordance with local, state and federal regulations. If any soil staining or release of hazardous substances is observed during removal, the signatories of this report should be contacted. *The shed and trailer were not noted on the Site, nor were stained soils noted at the Site. No additional information was obtained to indicate that the former shed or trailer are a REC for the Site.*
9. Two concrete debris piles (approximately 5 cubic yards) were noted throughout the site and three gallon-size paint cans were note in the southeast corner of the site. The debris should be removed prior to development. Any petroleum products and/or hazardous materials encountered should be disposed of or recycled in accordance with local, state and federal regulations. If any staining is encountered during removal, the signatories of this report should be contacted. *These observations (paint cans and soil piles) were not identified during our site reconnaissance. It appears the noted debris and soil piles were removed and/or is no longer within the current Site boundaries. The former finding regarding disposal and soil staining is still relevant to the Site. The former observations were not found to be a REC for the Site.*
10. An irrigation well is located in the southwest corner of the site. If the well is intended for future use, it should be tested for suitability. If the well is to be removed, Kleinfelder recommends that the well be abandoned in accordance with local, state and federal regulations. *This appears to be a past observation that was not within the current Site boundary. In addition no wells were noted at the current Site. This former finding is not evaluated as a REC for the Site.*
11. Due to lack of noticeable wetland features (lack of obvious surface hydrology, disturbed soils and lack of hydric vegetation) found on-site during the subject preliminary investigation, a USACE-jurisdictional wetland delineation would not likely be warranted. *This assessment does not include and evaluation regarding wetland and biological features or the context subjects of this finding.*

12. A preliminary biological site evaluation, which examined the site's potential to host State of California and Federally Threatened and Endangered listed animal species, was conducted at the proposed Lowe's project site. Based on the results of the preliminary biological site evaluation, it is unlikely there are any special-status plant or wildlife species with a moderate or high potential to be present within the project area. Further work such as biological surveys and assessment of potential site development is not recommended based on the current disturbed site conditions. *This assessment does not include an evaluation regarding wetland, biological or endangered species or the context subjects of this finding.*
13. To insure that significant cultural and historic resources are not compromised or overlooked, it is recommended that an archaeological field survey be undertaken before construction at this site begins.

No subsurface archaeological survey has been conducted within the proposed project area. Unidentified cultural or historic resources may be encountered during construction activities, which may require further study and evaluation by a qualified professional of the appropriate discipline (archaeologist, architectural historian, historian, etc.). In the event that a cultural or historical resource is encountered during construction, it is recommended that work in the immediate vicinity of the resource halt until a qualified professional has evaluated the discovery to determine its importance and appropriate treatment. Section 7050.5 of the California Health and Safety Code states that it is a misdemeanor to knowingly disturb a human burial. If human remains are encountered, the County Coroner must be contacted immediately, as must the Native American Heritage Commission in Sacramento so that a most likely descendent may be consulted. *This assessment does not include and evaluation regarding archaeological surveys, cultural resources, wetland and biological features or the context subjects of this finding.*

14. Airport Way Hwy 120 Bypass Exit, located at the Airport Way Hwy 120 Bypass exit, near the southern border of the site appears on the ERNS database. The facility is listed on the ERNS database due to a waste oil spill of 165 gallons on 11/01/1988. The incident is not expected to pose an environmental concern to the site. *No additional information was obtained to indicate this offsite property as a REC to the Site.*
15. 1805 Daniels Street, adjacent to the northeast of the site appears on the ERNS database. The facility is listed on the ERNS database due to a car hitting both the pad mounted transformer and the fire hydrant next to it on 03/24/2002. PG&E cleaned up material around the transformer and replaced the transformer. Based on this status the incident is not expected to pose an environmental concern to the site. *No additional information was obtained to indicate this offsite property as a REC to the Site.*

The former ESA also concluded that the original 16-acre site was not listed on regulatory agency databases researched. In addition offsite facilities identified on regulatory agency databases within the ASTM search distance were not identified as a REC. *No additional information was obtained to indicate the Site or offsite properties as a REC to the Site.*

6.2 CONCLUSIONS

The following a summary of Kleinfelder's conclusions:

- Based on the limited agency research conducted for this supplemental environmental assessment, no new information was obtained to conclude a REC for the Site or from nearby offsite properties/facilities.
- OCP concentrations from the EPA 8081A suite of analyses were not reported at or above laboratory reporting limits in near-surface soil from past agricultural practices at the locations sampled. OCPs have been recognized to be persistent, typically present in shallow soil, and attenuate rapidly with depth when found. Based on this data and information, Kleinfelder does not recommend additional soil sampling for OCPs.
- This supplemental environmental assessment has not revealed evidence of RECs in connection with the Site.
- If unusual odors or discolored soils are encountered at this Site, additional investigation may be necessary, and a qualified environmental profession should be contacted for further consultation.

7 LIMITATIONS

Environmental assessments are non-comprehensive by nature and are unlikely to identify all environmental problems or eliminate all risk. The attached report is a qualitative assessment. Kleinfelder offers a range of investigative and engineering services to suit the needs of our clients, including more quantitative investigations. Although risk can never be eliminated, more detailed and extensive investigations yield more information, which may help you understand and better manage your risks. Since such detailed services involve greater expense, we ask our clients to participate in identifying the level of service that will provide them with an acceptable level of risk. Please contact the signatories of this report if you would like to discuss this issue of risk further.

Kleinfelder performed this environmental assessment in accordance with generally accepted standards of care practiced by other members of our profession in San Joaquin County, California at the time the work was completed, and subsequently approved by you as our client. Environmental issues not specifically addressed in the report were beyond the scope of our work and not included in our evaluation.

This report may only be used by the City of Manteca and only for the purposes stated, within a reasonable time from its issuance, but no more than one year from the date of the report. All information gathered by Kleinfelder is considered confidential and will be released only upon written authorization of the City of Manteca or as required by law. Non-compliance with any of these requirements by the City of Manteca or anyone else, unless specifically agreed to in advance by Kleinfelder in writing, will release Kleinfelder from any liability resulting from the use of this report by any unauthorized party and the City of Manteca agrees to defend, indemnify, and hold harmless Kleinfelder from any claim or liability associated with such unauthorized use or non-compliance.

Kleinfelder offers various levels of investigative and engineering services to suit the varying need of different clients. It should be recognized that definition and evaluation of geologic and environmental conditions are a difficult and inexact science. Judgments leading to conclusions and recommendations are generally made with incomplete knowledge of the subsurface conditions present. Although risk can never be eliminated, more detailed and extensive investigations yield more information, which may help understand and manage the

level of risk. Since such detailed investigation and analysis involve greater expense, our clients participate in determining levels of service that provide adequate information for their purposes at acceptable levels of risk. More extensive studies may be performed to reduce uncertainties. Acceptance of this report will indicate that the City of Manteca has reviewed the document and determined that it does not need or want a greater level of service than provided.

During the course of the performance of Kleinfelder's services, hazardous materials may be discovered. Kleinfelder will assume no responsibility or liability whatsoever for any claim, loss of property value, damage, or injury that results from pre-existing hazardous materials being encountered or present on the project site, or from the discovery of such hazardous materials. Nothing contained in this report should be construed or interpreted as requiring Kleinfelder to assume the status of an owner, operator, generator, or person who arranges for the disposal, transport, storage or treatment of hazardous materials within the meaning of any governmental statute, regulation or order. The City of Manteca will be solely responsible for notifying all governmental agencies, and the public at large, of the existence, release, treatment or disposal of any hazardous materials observed at the project site, either before or during performance of Kleinfelder's services. The City of Manteca will be responsible for all arrangements to lawfully store, treat, recycle, dispose, or otherwise handle hazardous materials, including samples resulting from Kleinfelder's services.

Regulations and professional standards applicable to Kleinfelder's services are continually evolving. Techniques are, by necessity, often new and relatively untried. Different professionals may reasonably adopt different approaches to similar problems. As such, our services are intended to provide The City of Manteca with a source of professional advice, opinions, and recommendations. Our professional opinions and recommendations are based on our research activities limited by the scope of work, in accordance with the generally accepted consulting practice that exists at the time and may depend on, and be qualified by, information gathered previously by others and provided to Kleinfelder. Consequently, no warranty or guarantee, express or implied, is intended or made.

Land use, site conditions (both on-site and off-site) and other factors will change over time. Since site activities and regulations beyond our control could change at any time after the completion of this report, our observations, findings and opinions can be considered valid only as of the date of the site visit. This report should not be relied upon after 180 days from the date of its issuance.

8 REFERENCES

Division of Oil and Gas: <ftp://ftp.consrv.ca.gov/pub/oil/maps/dist6/608/Map608.pdf>

Environmental Data Resources, SEC Daniels Drive and Airport Way Daniels Drive/Airport Way, Manteca, CA 95337. Inquiry Number 1481021.2s August 4, 2005.

Environmental Data Resources, SEC Daniels Drive and Airport Way Daniels Drive/Airport Way, Manteca, CA 95337. Aerial Photography Print Service, Inquiry Number 1481021.2s August 5, 2005.

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