



Soil Management Plan

5150 University Avenue
San Diego, California

September 28, 2020

Prepared For:

University Storage LLC
c/o Cardinal Industrial
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Prepared By:

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**Soil Management Plan
5150 University Avenue
San Diego, California**

This Soil Management Plan (SMP) has been prepared by Weis Environmental LLC on behalf of University Storage LLC for work to be completed at the above referenced property. This SMP was completed in accordance with the standards of care exercised by environmental professionals in the industry and under the technical direction of the undersigned.

A handwritten signature in black ink that reads "Daniel Weis".

Daniel Weis, R.E.H.S.
Environmental Manager

A handwritten signature in blue ink that reads "Eric M. Cathcart".

Eric M. Cathcart
Senior Geologist
California PG# 7548

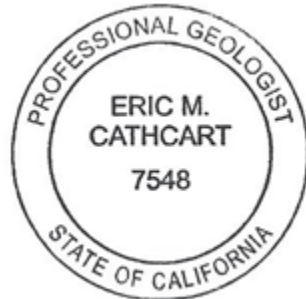


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1.0 INTRODUCTION

On behalf of University Storage LLC, Weis Environmental, LLC has prepared this Soil Management Plan (SMP) pertaining to the property located at 5150 University Avenue in San Diego, California (Site). This SMP presents a work plan to conduct contaminated soil segregation and management activities during redevelopment of the Site. The primary objective of this SMP is to affirm the protection of human health during the proposed grading activities and to complete contaminant source removal activities within the construction footprint for the new Site development. At the completion of the work proposed in this plan, a Report of Soil Removal Action will be prepared by our firm.

1.1 Project Location and Description

The Site is 2.18 acres and is further identified by San Diego County Assessor's Parcel Number 472-383-04-00. Streets bordering the Site include University Avenue to the south, 52nd Street to the east, and 51st Street to the west. A Vicinity Map is included as Figure 1. A Site Plan is included as Figure 2.

1.2 Previous Site Assessment

Prior Phase I and II Environmental Site Assessments were completed for the Site by others. Two underground storage tanks (USTs) were formerly present at the Site (see the Site Plan included as Figure 2). Releases of petroleum hydrocarbons to the subsurface occurred in both tank areas. The releases were assessed under the regulatory oversight of the County of San Diego Department of Environmental Health (DEH). The DEH closed the cases for the tanks upon adequate delineation of the impacts. The closure letters for the tank releases state that the corrective actions would need to be reviewed if the commercial/industrial land use were to change. Being that the Site will remain in use for commercial purposes, notification to the DEH of the planned development project is not required. The closure letters do state that any impacted soil encountered during construction activities will require proper handling. This SMP has been prepared to fulfill that requirement.

1.3 Estimated Distribution of Impacted Soil

The planned construction activities will include the excavation of a single-level basement storage area throughout much of the Site. Total excavation depths for the future basement are expected to range from approximately 12 to 15 feet below existing grades. Other portions of the Site will be subject to conventional grading activities (i.e. removal and recompaction of the upper approximately three to five feet of soil). There are documented residual petroleum hydrocarbon impacts in the areas of the former USTs. However, the impacted is considered to be limited in extent relative to the overall acreage of the Site. Prior residual impacts in the area of the northern UST were not encountered until a depth of 20 feet below existing grades. Therefore, it is not anticipated that such residual impacts will be discovered during conventional grading activities in the area of this former tank. The southern UST area is situated within the future basement area, with prior residual impacts encountered at shallower depths (five feet). As such, petroleum impacted soil is expected to be impacted in this area from approximately five feet to the bottom of the future basement excavation. No excavation beyond the depth required per the project grading will be conducted nor is it required. Petroleum impacted soil that is displaced and removed from the Site is anticipated to be profiled and removed as non-hazardous waste.



2.0 GEOLOGICAL AND HYDROGEOLOGICAL SETTING

The Site lies within the Peninsular Ranges Geologic Province of California. This geomorphic province is traversed by a group of northwest trending sub-parallel fault zones and encompasses an area that extends 125 miles from the Transverse Ranges and the Los Angeles Basin south to the Mexican Border and beyond another 775 miles to the tip of Baja California. Rocks within the Peninsular Range Province were emplaced during Cretaceous age orogenic events and uplifted into the present mountain ranges during the late Tertiary and Quaternary. Igneous, metamorphic and sedimentary rocks are all found within the Peninsular Ranges. The area is seismically active, with several known active faults crossing the Province.

Near surface soils underlying the Site reportedly consist of yellow brown, clayey silty sands and significant lenses of cobbles. The cobbles reportedly average approximately two to three inches in diameter with some expected to be upwards of six inches in diameter. The materials referenced above are associated with the Mission Valley Formation. Underlying the Mission Valley Formation is the Stadium Conglomerate.

According to the Water Quality Control Plan for the San Diego Basin, the Site is located within the Chollas Hydrologic Subarea of the Pueblo San Diego Hydrologic Unit. Groundwater in the San Diego Mesa Hydrologic Area has no existing beneficial use designations. Historical data indicated a relatively deep depth to water (greater than 100 feet) with an anticipated flow direction to the southwest.



3.0 SOIL MANAGEMENT

3.1 General Approach and Methods

The California Water Code and Titles 23 and 27 of the California Code of Regulations state that soil with detectable concentrations of hazardous substances or petroleum products above interpreted background levels are considered to be “waste” following excavation. Soil containing no such detections of hazardous substances or petroleum products would be considered “inert waste” or non-impacted soil. Waste soil is required to be transported to an appropriate waste management facility and be treated, stored, or disposed, and/or reused on-Site or off-Site in accordance with applicable environmental laws and regulations. Non-impacted soil can generally be moved and reused without restriction.

During the implementation of this SMP, any petroleum contaminated soil (i.e. waste soil) or soil suspected to be contaminated that is displaced by the excavation contractor during the construction activities will be segregated, stockpiled (where appropriate), sampled and shipped to regulated receiving facilities. During the excavation activities, any contaminated soil encountered will be removed using excavators, backhoes, loaders and/or other conventional construction equipment and placed onto trucks for off-Site disposal under appropriate manifesting protocols. Non-impacted soil will also be removed in a similar manner and will be tracked by bills of lading or trucking logs.

Environmental professionals working under the oversight of a California licensed Professional Geologist will be present at on-Site at appropriate times in order to assist in the effective implementation of this SMP. Personnel responsible for and involved in the implementation of this SMP will be thoroughly knowledgeable and experienced in the various aspects of the work to be completed. This knowledge and experience will include, but not be limited to, familiarity with the Site geologic and hydrogeologic conditions, laboratory data, Site physical conditions and access, Site personnel and contacts and Site health and safety rules, procedures, and protocols. Field personnel will have 40-hour Hazardous Waste Operations and Emergency Response (HAZWOPER) training and current 8-hour annual refresher training in accordance with 29 Code of Federal Regulations 1910.120 [Title 8 California Code of Regulations 5192]. Site field work will also be conducted in accordance with a Site-specific, worker health and safety plan. In addition, employees of the excavation contractor retained for this project who will be in contact with contaminated soil will have the proper 40-hour HAZWOPER training. The excavation contractor will also hold a Class A, Engineering Contractor’s license with a Hazardous Substance Removal Certification (HAZ) issued by the State of California. Health and safety monitoring will also be performed. The lead contractor and other consultants on the project, which may include testing and inspection, paleontological, archeological, etc., may also rely on health and safety related protocols, although the contractor and other consultants will be ultimately responsible for the training and health and safety of their own workers and employees.

3.2 Export of Impacted Soils

As stated previously, the planned construction activities will include the excavation of a single-level basement storage area throughout much of the Site. Total excavation depths for the future basement are expected to range from approximately 12 to 15 feet below existing grades. Other portions of the Site will be subject to conventional grading activities (i.e. removal and recompaction of the upper approximately three to five feet of soil).



In the future basement area, mass excavation will occur in vertical lifts which are generally five feet in height. As the future basement area is excavated in appropriate sized lifts, petroleum impacted soil will be removed from the former southern UST area as it is encountered. Soil to be removed in other portions of the Site is not expected to require special handling and/or monitoring unless an unforeseen condition is encountered. If such, soil is encountered however, it will be handled by way of the same methods described in this SMP for the southern former UST area. We will work with the selected excavation contractor to direct and guide the excavation and proper segregation of petroleum impacted soil from non-contaminated soil.

If petroleum impacted is encountered, such soil will either be stockpiled based on visual and olfactory observations, photo-ionization detector (PID) screening for undifferentiated VOCs, stationary and/or mobile analytical laboratory sample analysis and/or professional judgment. Such soil may also be loaded directly onto trucks where petroleum impacts are unquestionably present. If soil is temporarily stockpiled during soil management activities, it will be sampled in accordance with sample frequency guidelines as specified by the selected regulated receiving facility or facilities.

Confirmation soil samples will also be obtained to assist in delineating contaminated soil from non-contaminated soil. Such samples will be collected using a stainless-steel hand trowel or auger from the base and sidewalls of the excavated areas. The sample frequency of confirmation soil samples will be determined based in part on field conditions observed but will be no greater than 20 foot lateral distances along sidewalls and 400 square feet of excavation bottoms. If any detectable levels of petroleum hydrocarbons and/or volatile organic compounds (VOCs) are found in one or more of the confirmation soil samples, additional excavation will occur vertically or laterally and additional sampling will be conducted under the same protocol as described previously in this section. It should also be noted that if soil is encountered that exhibits petroleum hydrocarbon staining and/or odors and does not contain petroleum hydrocarbons or VOCs following laboratory analysis, it will not be exported from the Site as non-contaminated soil and will be delivered to a regulated receiving facility. In addition, excavation activities for the project will be limited to lateral and vertical distances as depicted in the forthcoming grading plan for the project. As such, over excavation of soil within the construction footprint for the purposes removing contaminated soil (if encountered) will not be conducted.

The contractor will be required to implement adequate vapor and dust control methods to minimize potential worker and public exposure to dust generated as a result of the planned excavation activities. Engineering and construction practices will be used to reduce vapor emissions including covering off-gassing excavations or stockpiles, misting excavations or stockpiles with water or other vapor suppressing agents, locating stockpiles away from and/or downwind of public receptors and stopping work until mitigation measures are in place. While potential nuisance odors are not considered to be a significant public health hazard, they will be considered a condition that requires attention and control methods. Efforts to minimize nuisance odors will be conducted in a similar manner to those to be implemented for vapor suppression purposes. Dust suppression measures will include but not be limited to covering stockpiled soil with plastic sheeting, reducing the pace of the excavation as required, and/or maintaining levels of soil moisture by means of continuous moistening. There is a zero dust policy for the project and soil should be continuously moistened to minimize dust generated during the earthwork activities.

When petroleum impacted soil is encountered and being displaced, air monitoring will be performed utilizing a hand-held PID to assess any potential levels of organic vapors possibly resulting from gasoline/diesel vapors releasing from excavated soil. Fugitive organic chemical vapors will be



monitored as-needed along the vicinity of the excavation perimeter at minimum 15-minute intervals throughout the times in which displacement of petroleum hydrocarbon impacted soil occurs. A reading of one part per million or greater sustained for one minute or longer or an instantaneous maximum of 10 parts per million on a PID at the down-wind perimeter shall initiate taking corrective measures. The PID will be calibrated in accordance with manufacturer specifications and monitoring records will be maintained and made available for review upon request. As there is a zero dust policy for the project and control measures can be evaluated by way of visual observations, we do not propose conducting dust monitoring utilizing field instruments during the project. Field staff will inform the contractor to increase wetting other dust control measures if any visible dust is observed during the contaminated soil management activities.

3.3 Sample Collection Procedures

Soil samples to be obtained during the field sampling will be collected into analytical laboratory provided four-ounce glass jars. Sample labels will be attached to the jars, and the following information will be printed on the label:

- Project name
- Sample identification number
- Date and time of collection

Preservatives will not be required for the soil samples. All soil samples will be properly prepared for transportation to the environmental analytical laboratory by placing the samples in coolers containing ice to maintain a shipping temperature of 4°C +/- 2°C.

3.4 Receiving Facilities

Potential landfill/recycling facilities to receive lead impacted soil removed from the Site as a regulated waste are yet to be determined. Final decisions pertaining to the use of such facilities will be made closer to the time of the commencement of excavation. However, all petroleum impacted soil that requires export during construction activities will be delivered to appropriate receiving facilities. The locations of such facilities will be provided in the Report of Soil Management for the project.

3.5 Laboratory Analysis

A list of analytical laboratory methods to be used (as required) during the soil management activities and/or waste profiling during the course of the project is as follows:

- Single element total metal by United States Environmental Protection Agency (EPA) test Method 6010B.
- Title 22 Metals by EPA test Methods 6010B and 7471A
- Total petroleum hydrocarbons by EPA test Method 8015B
- Volatile organic compounds by EPA test Method 8260B
- Semi-volatile organic compounds by EPA test Method 8270C
- Polycyclic Aromatic Hydrocarbons by EPA test Method 8270C with Select Ion Monitoring
- Polychlorinated biphenyls by EPA test Method 8082
- Single element soluble metal – Soluble Threshold Limit Concentration (STLC)
- Single element soluble metal – Toxicity Characteristic Leaching Procedure (TCLP)
- STLC 17 metals



- TCLP 8 metals
- Soil pH by EPA test Method 9045

3.6 Unexpected Discoveries During Soil Management

Due to the uncertainty associated with soil management, especially during mass excavations completed at project in the downtown San Diego area and its neighboring communities, contaminant conditions and distribution may vary from what is described in this SMP. Following discovery of an unexpected condition that requires modification to the soil management methods and protocols described in this SMP, the plan amendments will be prepared if warranted. If any USTs are encountered during the soil management activities, the County of San Diego DEH Hazardous Materials Division and City of San Diego Fire Department (SDFD) will be notified and the UST(s) will be removed under proper permits and in accordance with DEH and SDFD guidelines.



4.0 RECORD KEEPING

4.1 Chain-Of-Custody and Sample Tracking

Chain-of-custody procedures will be followed to establish a written record of sample handling and movement between the Site and the analytical laboratory. All soil samples will be delivered to the analytical laboratories on ice to maintain the samples at a target temperature of 4°C +/- 2°C. The chain-of-custodies will contain the following information:

- Project Location.
- Sample identification number.
- Date and time of collection.
- Sample collector's printed name and signature.
- Sample matrix.
- Analyses requested.
- Signatures of individuals involved in the chain of possession.

4.2 Transportation and Waste Manifesting

Soils will be transported in accordance with applicable DOT regulations. Any soil transported to off-Site regulated landfill or treatment facilities will be done so under proper manifesting protocol to track the movement of soil from the point of generation to the final disposal point. Non-hazardous waste manifests or uniform hazardous waste manifests will be utilized depending on the waste profiling activities to be completed. The excavation contractor will maintain one copy of all waste manifests on-Site with copies provided to University Storage LLC as generator. All manifests will require a signature by the generator. The contractor will also obtain weight tickets, receipts or other documentation confirming the acceptance and disposal for all project soils deposited at the facilities and provide that information to the generator.

4.3 Field Reports

In order to provide complete documentation of the fieldwork activities associates with the management of any impacted soil, records will be maintained by field personnel. These records will include the following information:

- Site name and location.
- Date.
- Name of field log recorder.
- Team members present on-Site and associated duties.
- Other persons on-Site (i.e. subcontractors, regulatory personnel, etc.).
- A brief summary of meeting(s) held at the Site.
- Weather conditions.
- Maps showing the locations of excavations and descriptions of observations relative to such areas.
- Any other relevant information.



5.0 REPORTING

The implementation of this SMP will be documented in a Report of Soil Management. The report will be signed by a State of California licensed Professional Geologist and will describe the implementation of the SMP, the results of any waste profiling, stockpile and confirmation sampling and laboratory analysis and the disposition of contaminated soil that is exported from the Site. The report will also include plans that depict the locations of select soil samples that will demonstrate that contaminated soil was adequately segregated from non-contaminated soil and removed from the Site. Other supporting documentation to be submitted with the report will include copies of analytical laboratory reports and copies of weight ticket reports and manifests from the regulated facilities receiving contaminated soil that is exported from the Site.



FIGURES

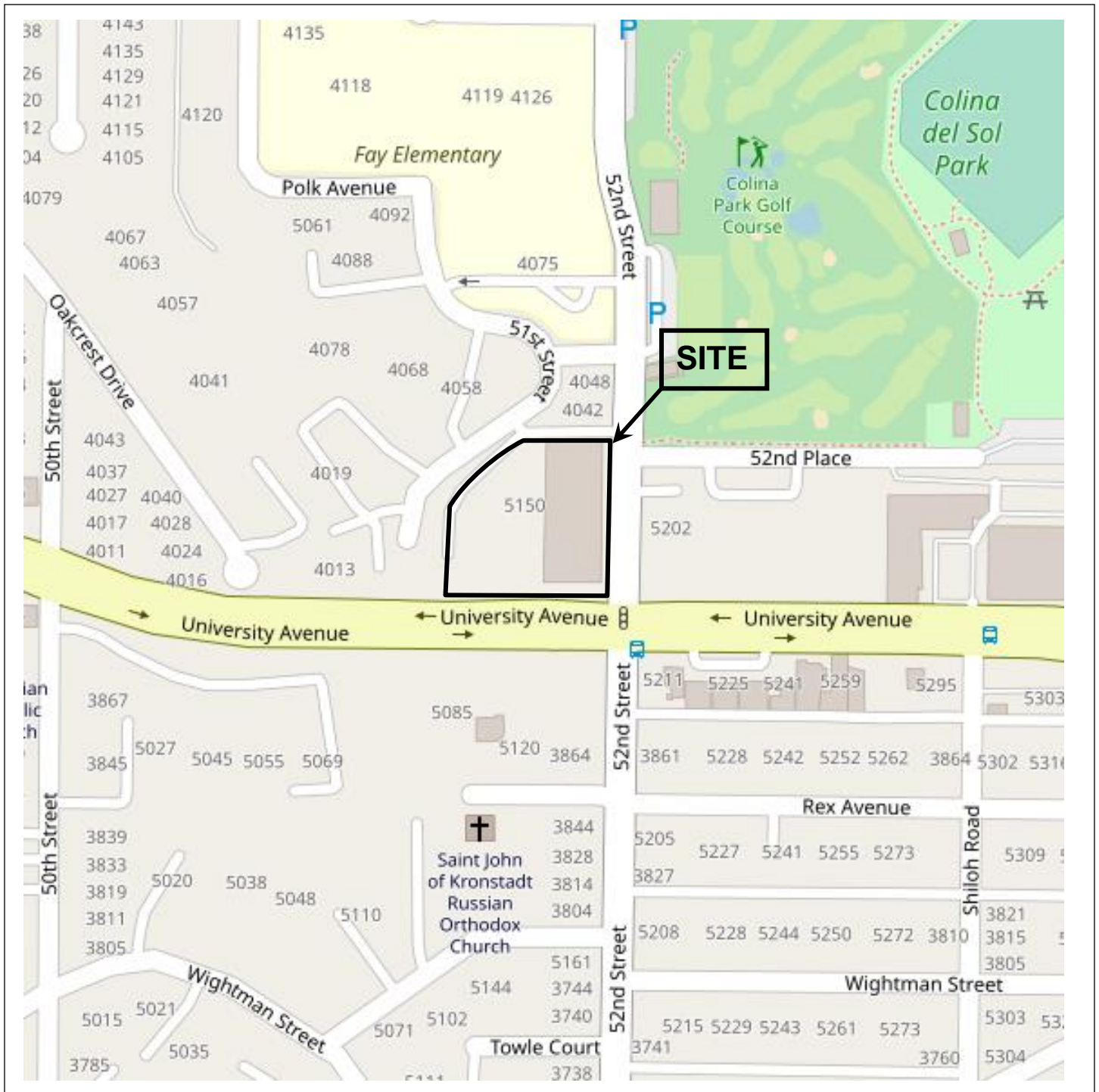


Figure 1 - Vicinity Map

5150 University Avenue
San Diego, California



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Carlsbad, CA 92008





Figure 2 - Site Plan

5150 University Avenue
San Diego, California



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October 26, 2020

University Storage LLC
c/o Cardinal Industrial
Attn: George Hicker
15260 Ventura Boulevard Suite 1120
Sherman Oaks, CA 91403

Subject: 5150 University Avenue
San Diego, California

Dear Mr. Hicker:

Weis Environmental LLC understands that the lender for your project located at 5150 University Avenue in San Diego, California (Site) is requesting information pertaining to the anticipated costs and timing for the removal of petroleum hydrocarbon impacted soil to be completed at the Site. Our firm recently prepared a Soil Management Plan (SMP) for the Site. As stated in the SMP, two underground storage tanks (USTs) were formerly present at the Site. Releases of petroleum hydrocarbons to the subsurface occurred in both tank areas. One of the USTs was located in the northern portion of the Site and the other in the southern area.

The planned construction activities will include the excavation of a single-level basement storage area throughout much of the Site. Total excavation depths for the future basement are expected to range from approximately 12 to 15 feet below existing grades. Other portions of the Site will be subject to conventional grading activities (i.e. removal and recompaction of the upper approximately three to five feet of soil). There are documented residual petroleum hydrocarbon impacts in the areas of the former USTs. However, the impacted is considered to be limited in extent relative to the overall acreage of the Site. Prior residual impacts in the area of the northern UST were not encountered until a depth of 20 feet below existing grades. Therefore, it is not anticipated that such residual impacts will be discovered during conventional grading activities in the area of this former tank. The southern UST area is situated within the future basement area, with prior residual impacts encountered at shallower depths (five feet). As such, petroleum impacted soil is expected to be impacted in this area from approximately five feet to the bottom of the future basement excavation in this area (12 feet). No excavation beyond the depth required per the project grading will be conducted nor is it required as this is not considered to be a remedial effort. The impacted soil handling and disposal is considered to be conventional soil management completed during the course of general construction. Such activities are common at development sites in urban settings in the San Diego region where former USTs were present. Petroleum impacted soil that is displaced and removed from the Site will be profiled and removed as non-hazardous waste.



Based on a former UST excavation size of 200 square feet (10 feet by 20 feet) and a seven foot deep zone of petroleum hydrocarbon impacted soil (five feet to 12 feet), the estimated volume of impacted soil to be removed from the southern former UST area is on the order of 50 cubic yards, or 75 tons. The cost for the loading, transportation and disposal of such soil at the Otay Landfill in Chula Vista, California is \$58.30 per ton (cost provided by the excavation contractor for the project). The corresponding cost is \$4,372.50. The impacted soil excavation will be completed concurrent with general grading activities, which in the future basement area will include approximately five foot vertical lifts of soil excavated concurrent with the installation of wooden lagging associated with the shoring system. When the vertical excavation reaches the bottom finished grade for the future basement area, the contaminated soil management activities will be deemed complete.

As stated in the project SMP, following completion of the soil excavation activities, we will prepare a Report of Soil Management. The report will describe in detail the implementation of the SMP for the Site. The report will be completed within approximately 30 days after the completion of Site grading activities.

We appreciate the opportunity to be of service on this project. If you should have any questions regarding this report, or if we can be of further assistance, please contact us at 760.585.7070.

Sincerely,



Daniel Weis, R.E.H.S.
Environmental Manager



Eric M. Cathcart, MS, PG
Senior Geologist
California Professional Geologist #7548

