



Soil Management Plan

Campus Point Master Plan Project
City of San Diego, California

prepared for
LPA Design Studios
1600 National Avenue
San Diego, California 92113

prepared by
Rincon Consultants, Inc.

April 22, 2020



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Environmental Scientists | Planners | Engineers

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April 22, 2020
Project 19-08066

Eric Jones, Managing Director
LPA Design Studios
1600 National Avenue
San Diego, California 92113
Via email: ejones@lpadesignstudios.com

**Subject: Soil Management Plan
Campus Point Master Plan Project
City of San Diego, California**

Dear Mr. Jones:

Rincon has prepared a Soil Management Plan (SMP) for the Campus Point Master Plan Project located in the City of San Diego, California. The Hazardous Materials Technical Study prepared for the subject property by Rincon Consultants, Inc., dated April 21, 2020, indicates that based on current historical uses of the Project site there is the potential for soil impacted with hazardous materials to be encountered during proposed redevelopment activities.

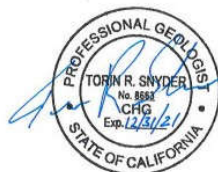
The purpose of this SMP is to present procedures to be followed during subsurface demolition and grading activities to identify potentially impacted soil and how to handle contaminated soil, if encountered. In addition, soil sampling protocols with screening levels are proposed and appropriate remedial excavations may occur if screening levels are exceeded.

If you have any questions, or if we can be of any further assistance, please contact the undersigned.

Sincerely,
Rincon Consultants, Inc.

A handwritten signature in blue ink that reads 'Lisa Bestard'.

Lisa Bestard
Senior Environmental Scientist



Torin Snyder, PG, CHG, ToR QSD/P, CPSS
Principal

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Appendix A Campus Point Master Plan, Exhibit for SMP prepared by MBI (April 13, 2020)



1 Introduction

On behalf of Alexandria Real Estate Equities (ARE) and LPA Design Studios, consultant to ARE, Rincon Consultants, Inc. (Rincon) has prepared this Soil Management Plan (SMP) for the Campus Point Master Plan Project. The Project area consists of eight parcels totaling approximately 84-acres located east of Interstate 5 (I-5) north of Campus Point Court, west of Campus Point Drive, and south of Roselle Street in San Diego, California (Project – Figure 1). Rincon understands that the proposed development project will include the demolition of three existing buildings and the construction of four new technology and life sciences buildings and a parking garage, each with one to two levels of subterranean parking. Other Project improvements include grading, site utilities, access improvements, drainage improvements, landscaping, irrigation, and hardscape.

Based on the current and historical uses of the Project site, soil impacted by former operations may exist and may be encountered during demolition and grading activities. This SMP presents the procedures to be followed during earthwork activities to properly identify, excavate, transport, and dispose of contaminated soil, if encountered.



2 Background

The Project site consists of eight parcels totaling approximately 84-acres located east of I-5, north of Campus Point Court, west of Campus Point Drive, and south of Roselle Street in San Diego, California (Figure 2, Site Map). The project area is identified as Assessor's Parcel Number 343-230 -13-00, -14-00, -17-00, -38-00, -40-00, -41-00, -42-00, and -43-00.

The Project consists of a neighborhood development permit entitlement application (Process 2) for the existing Campus Point campus buildings (10260, 10290, and 10300 Campus Point Drive and two central plant facilities) and the Genesis campus buildings (4110, 4161, 4210/4224, 4242, and 4244 Campus Point Court and 10210 Campus Point Drive). The combined area of the Campus Point and Genesis campuses comprises the Project area.

The Campus Point Master Plan project would retain four existing buildings in the Campus Point campus, 10290 and 10300 Campus Point Drive (CP-1 and CP-2, respectively) and their two associated central plant facilities (CP1-1 and CP2-1), and four existing buildings on the Genesis campus (4242, 4210/4224, and 4244 Campus Point Court [CPS1, CPS3, and CPS4, respectively] and 10210 Campus Point Drive [CPS2]); but, includes plans to demolish the 4110 and 4161 Campus Point Court and 10260 Campus Point Drive buildings. The project includes constructing four new technology and sciences buildings, referred to as CP3, CP5, CP6, and CP7 and a parking structure, referred to as P2. Other Project site improvements include grading, site utilities, access improvements, drainage improvements, landscaping, irrigation, and hardscape. Construction of the four new buildings and the parking structure include below grade construction to depths ranging from approximately 6 to 31 feet below ground surface. A copy of the Campus Point Master Plan, Exhibit for SMP, prepared by MBI and dated April 13, 2020, includes grading information for the proposed buildings and is provided in Appendix A.

Rincon prepared a *Hazardous Materials Technical Study* (HMTS) for the Project site, dated April 21, 2020. The HMTS identified the following seven hazardous material findings:

1. Five underground storage tanks formerly at 10300 Campus Point Drive, removed in 1986.
2. Reported contaminated soil disposed during cleanup activities at 4161 Campus Point Court (Figure 2).
3. Current onsite hazardous and/or flammable materials storage areas at various locations on the Project site (Figure 2).
4. Multiple diesel fuel above-ground storage tanks (ASTs) at various locations at the Project site (Figure 2).
5. Possible subterranean piping that may contain hazardous and/or flammable materials at 10300 Campus Point Drive (Figure 2).
6. Structures built prior to 1989 that may contain asbestos-containing materials (ACM) at 10300, 10210, and 10260 Campus Point Drive and 4224/4110, 4242, and 4244 Campus Point Court.
7. Adjacent I-5 freeway.

Findings 1 and 5 are located in areas of the Project site in which no construction or demolition activities are planned and are therefore not considered to be a concern for the planned



redevelopment activities. One of the buildings identified in Finding 6, 10260 Campus Point Drive, is planned for demolition. Based on the age of construction of the building (pre-1989), there is potential that ACM may be present in the building. However, in accordance with local, state, and federal regulations, a survey to identify ACM within the building must be conducted and any ACM must be properly abated prior to receipt of a demolition permit for the structure. The other five buildings noted in Finding 6 are in areas of the Project site in which no construction or demolition activities are planned. Based on this, the potential presence of ACM in the buildings is not considered to be a concern for the planned demolition, grading, and construction activities for this project.

Findings 2, 3, 4, and 7 may have resulted in impacts to soil that may be encountered during planned demolition and grading activities. Additional discussion of the relevant findings is provided below.

- **Finding 2:** According to the regulatory records reviewed as part of the HMTS, contaminated soil was removed from the Project site associated with a cleanup at 4161 Campus Point Court in 1990 (1 ton) and 1996 (0.5 ton). Additional information regarding the clean-up activities was not available in the records reviewed; therefore, it is unknown where the soil removals were performed or if additional impacted soil remains in place. If impacted soil remains in place that is contaminated with petroleum hydrocarbons or other potential contaminants of concern (COCs), it may be encountered during the planned demolition and grading activities at 4161 Campus Point Court. Excavation activities in the vicinity of 4161 Campus Point Court will extend to depths of approximately 22 feet below ground surface.
- **Findings 3 and 4:** Hazardous/flammable materials appear to be stored in various locations throughout the project area, including diesel ASTs (Figure 2). If releases of hazardous/flammable materials occurred at these locations, soil impacted with petroleum hydrocarbons or other potential COCs may be encountered during planned demolition and/or grading activities in these areas.
- **Finding 7:** According to the historical resources reviewed, the I-5 Freeway has been located adjacent to the west of the alignment since at least 1966. Therefore, aerally-deposited lead (ADL) has the potential to be located in shallow soil on the portions of the Project site adjacent to the freeway. However, the proposed construction plans indicate that demolition, grading, and construction activities are not planned to take place within approximately 150 feet of the I-5 Freeway. In addition, the planned activities are within currently developed portions of the Project site that have previously been mass graded (early 1980s). Based on this information, ADL is not considered to be a concern for the planned demolition, grading, and construction activities for this project.

3 Potential Contaminants of Concern

This section describes the potential COCs that may be encountered in soil during construction-related soil excavations at the Project site. Based on the information reviewed in the HMTS, there are no known COCs at the Project site. However, based upon the historical and current site uses identified in the HMTS the following are considered potential COCs for the Project site:

- TPH in the gasoline range (TPH-g), diesel range (TPH-d), and oil range (TPH-o)
- Volatile organic compounds (VOCs)



4 Contaminated Soil Management

The following section outlines how to handle contaminated soil if encountered during construction activities. Dust mitigation and stormwater management measures are addressed in Sections 4.6 and 4.7, respectively.

4.1 Health and Safety

The site health and safety plan (HSP) outlines the measures to be followed to minimize exposure to onsite workers and the public. The HSP is prepared in accordance with Occupational Safety and Health Administration (OSHA) requirements (California Code of Regulations [CCR] Title 8 Section 5192) and contains safety provisions for routine response activities and unexpected emergencies. The plan contains information on chemical and physical hazards, personal protective equipment, decontamination procedures, personnel responsibilities, and emergency response protocols. The HSP will be presented to all onsite personnel and signed prior to the commencement of work. This document is required by Federal law. An HSP will be prepared by the Contractor in accordance with CCR Title 8 Section 5192 prior to the start of demolition and grading activities.

4.2 Excavation/Grading Contractor

Excavation/grading work in areas with known or suspected contamination will be performed by a Contractor with an active General A or B, and a HAZ Contractor's license with the State of California. Per OSHA regulations (Federal Standards –29 Code of Federal Regulations [CFR], Part 1926 and CCR Title 8 Section 5192), if the soil is classified as a hazardous waste then the Contractor's employees working on the Project site within the exclusion zone may be required to be 40-hour trained in Hazardous Materials and Waste Operations (HAZWOPER) prior to conducting excavation activities at the Project site, in accordance with the HSP. Proof of the required training for each of the onsite excavation Contractor's employees will be maintained at the Project site.

4.3 Identification of Contaminated Soil

Areas of known contaminated soil have not been identified on the Project site at this time. The Contractor will be responsible for identifying areas of possible contamination that may be encountered during the course of construction. Field evidence of contamination includes and is not limited to discolored/stained soil (grey or black, greenish, or other abnormal color), buried debris (such as metal, asphalt, pipes, concrete, or burned debris), or odors (such as "diesel," "oil," or "solvent" smell). Fuel releases such as gasoline, diesel, and motor oil tend to exhibit field evidence of contamination as described above. However, elevated metals concentrations, chlorinated solvents, pesticides, and other contaminants may not exhibit field evidence of contamination.

If field evidence of soil contamination is encountered during subsurface work, work should cease in that area of the Project site and ARE should be contacted. Soil exhibiting field evidence of contamination should be sampled under the direct oversight of a Professional Geologist or Professional Engineer. The analytical program should be determined based on the field evidence,



historic operations at the Project site, and history of the Project site. Work should not resume in potentially contaminated areas of the Project site without the permission of ARE. If the Project site is enrolled in a regulatory oversight program, with the approval of the ARE, the agency Case Worker should be notified. The Case Worker may direct and witness sampling or remedial soil excavation, if appropriate.

4.4 Excavation and Handling of Contaminated Soil

Excavation activities involving potentially contaminated soil shall be performed by a Contractor possessing all applicable permits. Air quality should be monitored by environmental field personnel during all activities in which contaminated, or potentially contaminated materials, are disturbed or handled, in accordance with the HSP. All onsite contractors engaged in earth disturbing activities or involved in the handling and/or management of impacted or potentially impacted soil and environmental field personnel shall be properly trained in accordance with federal and OSHA requirements, as applicable to their job tasks. Required personal protective equipment must be made immediately available, if deemed necessary, as identified in the HSP. Removal, handling, transportation, and disposal of contaminated soil excavated during the project will be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances.

As soil is excavated, it will be temporarily stored at designated staging areas on Project site. If the soil is impacted, direct hauling to a designated disposal site may also be considered. For direct hauling, excavated material will be characterized (Section 4.8) and loaded directly into trucks for transportation to an approved off-site disposal facility.

4.5 Soil Staging

All soil stockpiles and storage containers will be protected following the prescribed Best Management Practices (BMPs), which will be detailed in an approved Storm Water Pollution Prevention Plan (SWPPP) that will be prepared for the project.

If contaminated soil is stored on Project site, it shall be stockpiled stored on undamaged high-density polyethylene or equivalent impermeable barrier and covered with high-density polyethylene or equivalent impermeable barrier or placed in United States Department of Transportation (DOT) approved containers. The dimensions of the polyethylene sheeting shall exceed the dimensions of the stockpile. Containers will be covered and stored in such a fashion that minimizes the escape of contaminant vapors and odors, as well as erosion of the soil and rainwater infiltration. Impacted and potentially impacted soil must be stored separately from clean soil to limit contaminating clean soil.

The stockpile shall not be located in sensitive site areas or in areas containing inlets to storm drains and other water ways. Stockpile areas will not contain standing water at any time. Residual water resulting from excavated soil that is too wet to transport will be properly containerized, analyzed, and disposed.

4.6 Dust Mitigation and Track-Out Controls

To minimize dust generation, excavation areas will be controlled with soil wetting and physical barriers (e.g., plastic sheeting), as needed. Wetted surfaces will be visually wet, and care shall be taken during wetting to avoid generation of runoff.



Stray waste material and impacted soil on vehicles and tires will be removed manually with a brush at each excavation and soil staging area over plastic sheeting, as deemed necessary. Construction entrance plates (or shaker plates) will be used to help remove soil from tire treads of trucks leaving the Project site, if deemed necessary.

4.7 Stormwater Management

Stormwater management methods and strategies to reduce the sediment and pollutants being transported off site during subsurface and grading activities will be implemented in accordance with the erosion control plan and SWPPP.

In addition, hazardous waste management activities shall be performed as outlined in the *California Stormwater Quality Association Best Management Practices Handbook* (CASQA, 2015). BMPs will be applied to stockpiles to reduce the potential of sediment being transported off site by wind gusts and storm events.

4.8 Waste Characterization and Profiling

Soil for waste characterization for off-site disposal will be sampled, at an appropriate frequency and for the identified COCs, in accordance with the waste profiling requirements of the selected disposal facility(ies). Waste characterization sampling will be done in general conformance with the United States Environmental Protection Agency (EPA) SW-846 requirements. Only discrete soil samples will be collected. Samples shall be collected randomly on a three-dimensional grid using a random number generator.

Sampling equipment will be decontaminated using a triple-rinse procedure using non-phosphate detergent to prevent cross-contamination. Equipment intended for one-time use will be packaged for appropriate disposal.

Soil samples will be collected as described in Section 5.1. Archived samples must be appropriately preserved and analyzed within the maximum holding time.

4.9 Transportation Requirements and Procedures

4.9.1 Requirements for Haulers

Only qualified haulers will be retained to transport contaminated soil from the Project site. The selected haulers will be fully licensed and insured to transport the soils. Haulers will follow all applicable requirements in CFR, Title 49, Parts 174 through 177 with regard to loading, unloading, and general handling, based on transport mode.

4.9.2 Truck Loading Operations

As necessary, contaminated soils will be loaded into trucks at designated staging areas for transportation to the designated disposal facility. Stray waste material on vehicles, tires, or the lip of the container, etc., will be removed manually with a brush. The container of the truck will be covered to prevent release of soil and/or dust from the truck during transport. Prior to leaving the soil staging areas, each truck carrying contaminated soil will be inspected by environmental field personnel or the site supervisor to ensure that the containers are adequately covered or secured,

the trucks are cleaned of excess and stray soil, and the shipment is properly manifested and signed by the property owner or responsible party. Each truck will receive the proper placarding and paperwork provided by the Contractor. Water spray or dust suppressant will be applied during soil loading operations, as appropriate or necessary to minimize dust generation.

4.9.3 Transportation

Transportation of non-hazardous waste or hazardous waste offsite will be in accordance with Department of Transportation (DOT) regulations contained in CFR, Title 49 and the California Hazardous Waste Control Law (Health and Safety Code [HSC] Section 25100 et seq.; CCR, Title 22, Section 66428 et Seq.). Vehicle idling time of diesel equipment will be limited to no more than five (5) consecutive minutes. However, idling limit does not apply to:

- When queuing (waiting to load or unload material)
- Verifying that equipment is in safe operating condition
- For testing, servicing, repairing or diagnostic purposes
- When necessary to accomplish work for which the equipment was designed
- Warming the equipment to normal operating temperature, as specified by the manufacturer; and necessary to ensure safe operation of the equipment

In accordance with the above-mentioned regulations, all waste haulers will satisfy and provide documentation of the following requirements:

- Vehicles will have passed a current annual inspection
- Vehicle operators will be trained in the safe handling of the waste/material
- Haulers will document their ability to pay damages that may be caused by their operations through maintaining proper and current insurance coverage
- Haulers will have valid licenses issued by the California Highway Patrol (CHP) for transportation of hazardous materials
- Haulers will take certain actions to minimize waste discharges during transport (e.g., covering the load to prevent the discharge of dust/particulates into the atmosphere during hauling)

In accordance with the above-mentioned regulations, hazardous waste haulers will satisfy the following additional requirements:

- Haulers will have a valid DTSC registration
- Haulers will have an active EPA identification number
- Haulers will comply with the Uniform Hazardous Waste Manifest System

4.9.4 Route

Waste transportation routes will be on arterial streets and freeways approved for truck traffic to minimize potential impacts on the local neighborhood. Transportation should be conducted in accordance with the National Hazardous Material Route Registry - US Department of Transportation DOT - Federal Motor Carrier Safety Administration (FMCSA) Hazardous Materials (HM) designated, preferred, or prescribed routes for transportation of hazardous materials in California. Truck routes will be determined in advance of any hauling activity once a disposal facility is selected, as necessary.



4.9.5 Traffic Control Procedures

Soil for delivery to offsite disposal facilities will be transported in trucks from the Project site. Prior to loading, trucks will be staged in a controlled and orderly manner to avoid impacts on the local streets. Traffic will be coordinated in such a manner that, at any given time, a limited number of trucks will be at the Project site to reduce truck traffic on surrounding surface streets and to reduce dust generation during onsite movement. While at the Project site, vehicles will be required to maintain slow speeds (e.g., less than five miles per hour) for safety purposes, and to minimize dust generation to the extent practicable.

4.9.6 Shipment Documentation

The appropriate non-hazardous waste manifest or Uniform Hazardous Waste Manifest will be used to track the movement of waste soils from the point of generation to the disposal facility. Prior to transporting the excavated soil offsite, a representative authorized by ARE will sign each waste manifest. Copies of each waste manifest for each truckload will be maintained in each truck during transport to the disposal facility, as well as onsite until completion of the project. At a minimum, the shipping document will include the following information:

- Name and address of waste generator
- Name and address of waste hauler
- Name and address of disposal facility
- Description of the waste
- Quantity of waste shipped

Waste transportation will comply with the California Vehicle Code (CVC), CHP Regulations (13 CCR), California State Fire Marshal Regulations (19 CCR), DOT Regulations, Title 49, Code of Federal Regulations (49 CFR), and the California HSC and 22 CCR. These requirements include keeping of appropriate records during transportation activities. The representative authorized by the Contractor will be responsible for maintaining a record book of all waste management and trucking activities during onsite work. The record book will serve to document observations, personnel onsite, as well as truck arrival and departure times.

4.9.7 Contingency Plan

The waste hauler has prepared a contingency plan for emergency situations (vehicle breakdown, accident, diesel spill, fire, explosion, etc.) during transportation of soils off-site. Once the hauler is selected, a contingency plan will be reviewed and available on the Project site. In the event of an off-site release, accident involving transported material, or in the event of encountering potentially hazardous road conditions (e.g., accident sites, inclement weather, and nightfall or other cause of restricted visibility) alternate routes may be used, or transport will be delayed. Truck drivers will be in direct radio communication with their dispatchers. In the event of equipment failure or other contingency, the dispatcher will contact the most appropriate source of aid. Notification will immediately be given to the CHP, other appropriate agencies, and the Contractor.

5 Soil Sampling and Analysis Protocol

5.1 Confirmation Soil Sampling

If stained or odiferous soil is encountered during subsurface activities, soil samples will be collected to confirm the adequate removal of the impacted soil. The frequency and location of samples collected will be determined by the Environmental Professional based upon the conditions encountered and will be performed in accordance with the County of San Diego Department of Environmental Health (DEH) Site Assessment and Mitigation (SAM) Manual. If the Project site is enrolled in a regulatory oversight program the agency Case Worker should be notified and approval obtained on the sampling frequency and locations in advance.

Soil samples will be collected using either an excavator or hand tools. Soil samples will be collected from the center of the soil mass in the excavator bucket. If hand tools are used, the equipment will be decontaminated to prevent cross-contamination using a three-stage process using a non-phosphate detergent and potable water solution and potable water and deionized or distilled water rinses. Equipment intended for one-time use will be packaged for appropriate disposal.

Soil samples will be collected in laboratory-supplied containers appropriate to the selected analytical methods. Containers will be labeled and placed on ice in a cooler for shipment. The cooler will be transported to a State-certified laboratory under chain-of-custody documentation. Soil will be analyzed by a California-certified analytical laboratory for the COCs identified by the Environmental Professional using the appropriate laboratory analytical methods

5.1.1 Screening Levels

Concentrations of detected COCs will be compared to the California Department of Toxic Substances Control (DTSC)-modified screening levels for commercial/industrial soil, or EPA Regional Screening Levels (RSLs) for industrial soil, if DTSC-modified screening levels have not been established. If COCs are detected at concentrations that exceed the screening levels, additional excavation and confirmation sampling may be required.

5.1.2 Actions Based on Soil Results

The screening levels presented above will be considered when reviewing soil analytical results. If concentrations are below screening levels, no further action will be necessary and remedial excavation activities can cease. If the Project site is enrolled in a regulatory oversight program the agency Case Worker should be notified and approval obtained prior to additional excavation activities in the area.

If detected concentrations of COC exceed screening levels, ARE will be notified and additional excavation and confirmation sampling may be required. If the Project site is enrolled in a regulatory oversight program the agency Case Worker should be notified and concurrence obtained on the additional excavation and sampling plan.

6 Other

This SMP has not incorporated additional requirements that may be required in permits that may apply to this project. If there are terms in this SMP that contradict permit conditions, the permit requirement(s) will take precedence.

It may be necessary to include updated and additional information to this plan as the project progresses. Approved amendments shall be inserted into the appropriate section of this report.



7 Reporting

A copy of this SMP should be submitted to the County of San Diego Department of Environmental Health (DEH) Voluntary Assistance Program (VAP) for their review and approval along with an application to enroll in the VAP and associated application fee.

A report including a summary of the excavation methodology, volumes and locations of impacted soil removed from the Project site, a detailed map depicting sample locations, tabulated laboratory analytical results and copies of waste manifests should be prepared and submitted to ARE and the DEH. The report should be signed and stamped by a California Professional Geologist or California Professional Engineer.

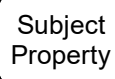


8 References

- CASQA, 2015. Stormwater Best Management Practice Handbook, Construction. January 2015.
- County of San Diego Department of Environmental Health, 2011, Site Assessment and Mitigation Manual, Section 5, Site Investigation Techniques. August 15, 2011.
- DTSC, 2019. Human Health Risk Assessment Note 3 – DTSC-Modified Screening Levels (DTSC-SLs). April 2019.
- Rincon Consultants, Inc., 2020, Hazardous Materials Technical Study, Campus Point Master Plan Project, City and County of San Diego, California. April 21, 2020.
- United States Environmental Protection Agency, 2019. Regional Screening Levels. November 2019.



Figures



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Figure 1

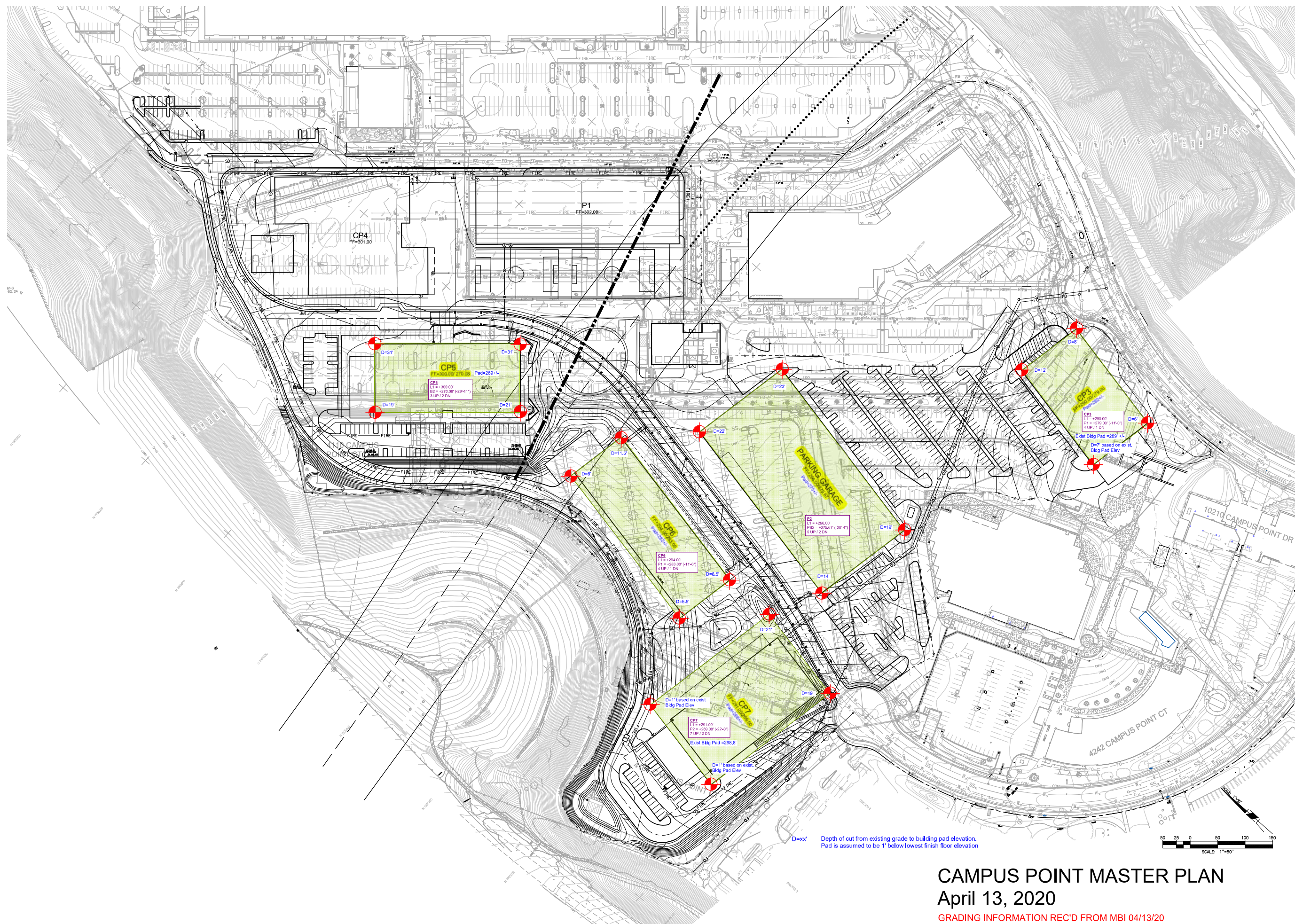


Site Map

Figure 2

Appendix A

Campus Point Master Plan, Exhibit for MSP prepared by MBI (April 13, 2020)



CAMPUS POINT MASTER PLAN

April 13, 2020

GRADING INFORMATION REC'D FROM MBI 04/13/20
EXHIBIT FOR SMP BLDG DEPTH COORD FOR RINCON & MBI 04/22/20