Summary of Ag Park – FRA activities

Project began as simple land trade: Nominally 63-acre FRA Hole Lake property for 59-acre Ag Park Project. FRA property zoned residential and in Airport RPZ zone – City Ag Park property had no Airport Land Use restrictions. City purchased similar zoned 12.3-acre property on Doolittle Avenue in 2002 for $2,400,000

Land trade details with party obligations detailed in May 23, 2003 Exchange, Development and Disposition Agreement.

FRA agreed to "clean-up" the Ag Park – the definition of "clean-up" in the 2003 EDDA was removal of the saline soil from one basin area, demolition of the vacant sewer plant, demolition of the existing pole barn building, and removal of the broken concrete (c&g, sidewalk, etc.) placed by City road department as "slope protection" in the eastern and northern gullys.

FRA commenced the demolition work as defined in the EDDA , no grading permits required for the demolition work – the removal of 4th concrete structure resulted in the discovery of unknown substances in the lower tank portion of the structure, which was below existing ground level.

City removed unknown material to Acorn Street Sewer Treatment Plant and then had it tested. This is when presence of PCBs was discovered. City issued stop work notice to FRA in August 2003 and FRA was told to vacate the site.

The rest of 2003 and all of 2004 was spent by City doing Characterization Studies to determine what was on the Ag Park site, and where was it. City hired two separate consultants to do testing and report preparation.

FRA hired it's own environmental consultant in 2004; they did separate testing and developed a cleanup plan for DTSC review and approval. The process with DTSC took nominally two years to complete with DTSC approval of the cleanup plan in August 2006.

<u>Summary of testing done prior to DTSC Approval in August 2006 of the Cleanup plan: 1,129 tests</u>

658 Soil Samples tested for PCBs
62 soil samples tested for volatile organic compounds (VOCs)
55 soil samples tested for semi-volatile organic compounds (SVOCs)
49 soil samples tested for Polynuclear compounds (PAHs)
57 soil samples tested for Chlorinated Pesticides
25 soil samples tested for Organophosphorous Pesticides
25 soil samples tested for Herbicides
65 soil samples tested for Total Petroleum hydrocarbons
10 soil samples tested for explosive analytes (Perchlorate, NDMA, nitroaromatics and nitramines
73 soil samples tested for Title 22 metals
25 soil samples tested for Arsenic
25 soil samples tested for Dioxins and furans

Revision 1 to the EDDA in 2006 required FRA to complete expanded site cleanup under DTSC oversight
Revision 2 to the EDDA in 2009 split the expanded site cleanup into two phases.

Phase 1 site cleanup work done in 2009 – and the Phase 1 Response Plan implementation Report was approved by DTSC in 2010. Approximately 403 soil samples for confirmation were analyzed for PCBs, 18 soil samples for metals, and 31 soil samples for dioxins/furans for a **total of 452 tests. Air Quality Monitoring done during site removals, no PCBs detected in dust leaving the site.**

- 720 tons of PCB-impacted concrete from the sewer treatment structures was disposed of at Kettleman Hills facility

- 40.6 tons of Sewer Pipe from the south property line to the sewer treatment structures was excavated and disposed of at Kettleman Hills facility

- 8,666 tons of PCB contaminated soil was excavated and disposed of at Kettleman Hills facility

Test.

Phase 2 site cleanup work done in 2013 with Phase 2 Response Plan Implementation Report approved by DTSD in April 2014. **Nominally 995 confirmation** samples were taken during the soil excavation process.

- 165,226 tons of trace PCB contaminated soil was excavated and disposed of at Waste Management Azusa Land Reclamation facility in Azusa, CA

- 30,782 tons of clean soil was excavated and shipped from the site

- 4,481 tons on non-PCP contaminated concrete was shipped from the site

- 422 tons of green waste was shipped from the site

- 51 tons of asbestos cement pipe was shipped from the site

DTSC provided "No Further Action" Letter and Certificate of Completion on April 1, 2014

Total tests done on this site = 1,129 + 452 + 995 = 2,576

FRA commenced rough grading of project site in July 2014.

Concrete crushed onsite is concrete placed on the site by City Public Works/Road Department in gullys and is not contaminated with PCBs.

American Housing Ventures has extensively reviewed the project documents and reports, and has independently satisfied themselves as the cleanup of the project site.

They have prepared draft disclosure documents which provide information on the history of the site and the environmental cleanup of the site.

FRA proposes a third amendment to the EDDA to provide for the offsite mitigation for the CDFW 1600 SAA permit: the mitigation is the 7.2-acre wetlands creation adjacent to Hole Lake on the trade property