Revised Soil and Groundwater Management Plan

September 2025

Marici Project LLC

16207, 16233, and 16253 Gale Avenue
City of Industry, California 91475

Prepared For:

Marici Project LLC
11801 Domain Blvd. Suite 450
Austin, Texas 78758

Prepared By:

TRC
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Irvine, California 92614

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Project Manager

Reviewed and Approved by:
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Principal Hydrogeologist

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APPENDICES

Acronym List

AST	Aboveground storage tank
BER	Business Environmental Risk
BESS	Battery Energy Storage System
BMPs	Best management practices
CAM-17 Metals	California Administrative Manual metals
COCs	Contaminants of concern
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
GC	General Contractor
HAZWOPER	Hazardous Waste Operators and Emergency Response
HASP	Health and Safety Plan
NPDES	National Pollutants Discharge Elimination Permit System
OCPs	Organochlorine pesticides
OSHA	Occupational Safety and Health Administration
PCBs	Polychlorinated Biphenyls
PCE	Perchloroethylene
PPE	Personal protective equipment
PRP	Potential responsible party
pVEC	Potential vapor encroachment condition
REC	Recognized environmental condition
SCAQMD	South Coast Air Quality Management District
SGMP	Soil and Groundwater Management Plan
STLC	Soluble Threshold Limit Concentration
SWPPP	Stormwater Pollution Prevention Plan
TBD	To be determined
TCE	Trichloroethylene
TCLP	Toxicity Characteristic Leaching Procedure
TPH	Total petroleum hydrocarbons
UST	Underground storage tank
VEC	Vapor encroachment conditions
VOCs	Volatile organic compounds
WET	Waste Extraction Test

Soil and Groundwater Management Plan (SGMP) Reference Guide

Site Description	
Project Name:	Marici Project LLC
Project Location:	16207,16233, and 16253 Gale Avenue City of Industry, California 91475
Owner Contacts	
Owner:	Marici Project LLC
Primary Contact:	Alex Evers, Operations Manager Mobile: (626) 437-3346 Email: AEvers@aypa.com
Alternate Contact:	Nate Moore, Vice President of Operations and Maintenance Mobile: (775) 545-2078 Email: AEvers@aypa.com
Contractor Contacts	
General Contractor (GC)	To be determined
Environmental Professional (EP)	To be determined
California Certified Laboratory	To be determined
Relevant Permits/Agency Notification Requirements	
Confined Space Entry Permit	Required if qualified/trained personnel will be entering an excavation deeper than four feet, or if entering a structure with limited ingress/egress and the potential for hazardous atmosphere.
South Coast Air Quality Management District (SCAQMD)	The contractor to confirm that no permit and no notification is required. Best management practices (BMPs) need to be implemented for effective dust control management (confining generated dust to the boundaries of the Property). Any impacted or potentially impacted soils should be covered and/or containerized and handled as indicated herein.
County of Los Angeles Public Health – Environmental Health	Permits are required for soil borings deeper than 10 feet or that extend into groundwater.
State Water Resources Control Board (Water Board)	Stormwater Pollution Prevention Plan (SWPPP) and Construction Stormwater General Permit Order 2022-0057-DWQ coverage are required for construction activities; clearing, demolition, grading, excavation, and other land disturbance activities.

Potential Disposal/Recycling Facilities	
Non-Hazardous Soil	Soil Safe, Adelanto, CA
Hazardous Soil	CWM Kettleman Hills Landfill, Kettleman City, CA
Non-RCRA Hazardous Soil and Groundwater	TBD based on confirmation of compliance status to accept waste at the time of disposal. Potential facilities include: • World Oil Recycling, Compton, CA • Chiquita Canyon Landfill, Castaic, CA • Simi Valley Landfill and Recycling Center, Simi Valley, CA • Azusa Land Reclamation (owned by Waste Management, Inc.), Azusa, CA • Clean Harbors Buttonwillow Landfill Facility, Buttonwillow, CA
Potential Waste Transportation	
Registered Waste Hauler	Belshire Environmental SVCS, Inc.

1.0 Introduction

TRC has prepared this Revised Soil and Groundwater Management Plan (SGMP) to provide background information on environmental site conditions and best management practices (BMPs) for use in the event impacted soil or excavation water is encountered during construction of the Marici Project LLC. The project consists of demolition of existing site features and development of a Battery Energy Storage System (BESS). The project will be developed on parcels comprising 16207, 16233, and 16253 Gale Avenue in the City of Industry, California (Site). A Vicinity Map showing the Site location, and a Site Diagram showing an aerial photograph with the existing site features are included as **Exhibits 1 and 2** in **Appendix A**, respectively.

2.0 Site Description

Site Name	Marici Project LLC
Site Location/Address	16207,16233, and 16253 Gale Avenue City of Industry, California 91475 Los Angeles County Assessor Identification Numbers: 8242-016-033, 8242-016-034, 8242-016-036, 8242-016-044, and 8242-016-061
Site Description	The Site occupies approximately 9.2 acres that is primarily occupied by building improvements, asphalt-paved parking areas and driveways, concrete-paved loading docks, landscaping, and utilities. On-site operations include metal fabricating, food product warehousing, distribution, electronics, transportation services, and administrative business activities (Terracon, 2024, 2025a, 2025b).

Refer to **Appendix A** which includes **Exhibit 1** Vicinity Map showing the Site location and **Exhibit 2** Site Diagram showing an aerial photograph with existing developed conditions.

3.0 Background

The background information regarding the Site is primarily sourced from the five (5) previous Phase I Environmental Site Assessments [ESAs]) and two limited site investigations listed in the References. The Project addresses identified in this SGMP are those documented for the parcels on tax assessor records.

Current and historic land uses at the Site have included agricultural, industrial, and commercial activities, as follows:

- As early as 1894, the area of the Site and surrounding properties consisted of undeveloped and/or agricultural land through approximately the mid-1960s.
- By 1970, the eastern portion of the Site (16253 Gale Avenue) appeared as a Christmas tree farm with small structures/sheds in the east-central portion of the Site.
- By 1976, in the western portion of the Site (16233 Gale Avenue), the existing industrial building used for metal fabrication appeared to be developed.
- In the western portion of the Site (16207 Gale Avenue):

  - From 1970-2009, a stainless-steel commercial appliance manufacturer operated at the Site.
  - From 2009-2022, an auto and tent parts warehouse facility operated at the Site.
  - From 2009-2020, a computer numeric control (CNC) machine shop operated at the Site.
- By 2000, the eastern portion of the Site was developed with the existing multi-tenant logistical warehousing and fulfillment facility.
- Current operations include administrative business activities, warehousing, distribution, electronics, metal fabricating, and transportation services.

Immediately adjacent to the Site, land uses have included railroad, utility, and residential, as follows:

- By 1927, Union Pacific Railroad appeared developed north of the Site.
- By 1964:
  - The Southern California Edison Walnut Substation appeared developed east of the Site.
  - Residential neighborhoods appeared developed south of the Site.
- Land uses at the adjoining properties have remained consistent to the present.

Overall, based on the Phase I ESAs (Terracon, 2025a and 2025b) performed for the properties at the Site, the following conclusions regarding environmental conditions of concern have been identified:

- The Site is located within the San Gabriel Valley, Puente Valley Operable Unit (Area 4) Superfund project, which includes regional groundwater that is impacted by halogenated solvents including trichloroethylene (TCE) and perchloroethylene (PCE) above applicable regulatory screening levels. Based on the regional plume maps in November 2020 showing PCE concentrations in shallow groundwater, it appears the plume is mostly located north/northeast of the Site and extends underneath the Site in the vicinity of Gale Avenue (see Figure 14 prepared by Tetra Tech in **Appendix B**). Based on review of the Environmental Protection Agency (EPA) and Regional Water Board records, the Site was not reported as a contributor to the plume (Terracon, 2024) and the Site was not listed as a potential responsible party (PRP; Partner, 2017). Relative to the Site, this Superfund project represents a recognized environmental condition (REC) and potential vapor encroachment condition (pVEC) due to the anticipated shallow depth of groundwater in the Site vicinity (Terracon, 2024, 2025a, 2025b).

- The off-site adjoining SCE Walnut Substation located east of the Site was identified as a potential source for halogenated solvent impacts to shallow groundwater beneath the Site based on the generated waste streams identified (including halogenated solvents), the close proximity to the Site, and the shallow depth to groundwater (approximately 19 feet below grade [fbg]). The off-site SCE Walnut Substation represents a REC to the Site (Terracon, 2024).

- For the 16207 Gale Avenue property, the former stainless-steel commercial appliance manufacturer represents a REC to the Site based on the longevity of industrial operations (approximately 39 years), lack of information concerning waste streams, and

the likely use of petroleum and solvents/chemicals as part of the historical operations (Terracon, 2025a).

- For the 16233 Gale Avenue property, the Metal Cutting Service facility represents a REC to the Site based on longevity of business operations (approximately 49 years), the likely use of petroleum and solvents/chemicals as part of the current and historical operations at the Site, and the potential release of hazardous substances (Terracon, 2025b).

- Polychlorinated biphenyls (PCBs) were identified offsite (SCE Walnut Substation). The Phase I ESAs concluded they do not represent a REC for the Site.

- Organochlorine pesticides (OCPs) from historic agricultural land use are not identified as a REC for the Site.

Limited site investigations (LSIs) were performed at the properties in February 2025, and were reported in Terracon, 2025c and 2025d listed in the References. The objective of the LSIs were to assess the presence of chemicals commonly associated with the RECs identified in the Phase I ESAs. The laboratory results of soil and soil vapor samples collected and analyzed for the LSIs are summarized as follows:

- Soil – TPH and VOCs: Volatile organic compounds (VOCs), total petroleum hydrocarbons gasoline range organics, (TPH-GRO), TPH diesel range organics (TPH-DRO) were not detected above laboratory reporting limits (RLs). Motor oil range organics (TPH-MORO) were detected above the RL for one (1) sample, but it was below its residential and commercials environmental screening levels (ESLs). All other samples were below the RLs for each constituent analyzed.

- Soil – Metals: Metals were not detected above the laboratory RLs with the exception of arsenic, barium, chromium, cobalt, copper, lead, nickel, vanadium, and zinc. The concentrations of the metals listed above are within the range of naturally occurring “background” concentrations, and were below residential, commercial, and construction worker ESLs; except two (2) soil sample results for arsenic above ESLs but below the Department of Toxic Substances Control (DTSC) established regional “background” concentrations for Southern California.

- Soil Gas – TPH and VOCs: Concentrations of 1,3-butadiene, benzene, ethylbenzene, tetrachloroethene (PCE), trichloroethene (TCE), and 1,1,2,2-tetrachloroethane (TCA) were above either residential or commercial ESLs or both. It is noted that concentrations of VOCs in soil gas are generally increasing with depth, which supports that the regional VOC groundwater plume may be a likely source.

4.0 Excavated Soil Characteristics

While no impacted soils have been identified onsite, during excavation and grading, there is a potential to encounter unknown impacted soils, for example, when buildings, foundations or paving are removed or underlying soils are excavated. Based on the identified RECs, potential constituents of concern (COCs) could include total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs). If excavated, impacted soils may result in the generation of waste that would require management and additional precautions during construction.

The groundwater in the Site vicinity is anticipated to be encountered at depths ranging from approximately 21 to 26 fbg (Terracon Geotechnical Report, December 2024). Based on the maximum depth of the proposed excavation activities (up to 10 fbg), groundwater is not anticipated to be encountered at the Project Site during routine earthwork. However, geotechnical exploration soil borings and/or deep foundations for the interconnection support poles have the potential to encounter groundwater, which is further described in **Section 9.0**.

1. **RCRA Hazardous Waste** – excavated soil with representative chemical concentrations exceeding Federal criteria when analyzed by Toxicity Characteristic Leaching Procedure (TCLP). Based on the available data, soil excavated from the Project Site is not anticipated to fall under this category.

2. **Non-RCRA [California] Hazardous Waste** – excavated soil with representative chemical concentrations exceeding State criteria when analyzed by Waste Extraction Test (WET) methods, Soluble Threshold Limit Concentration (STLC), but not exceeding Federal criteria. Based on the available data, soil excavated from the Project Site is not anticipated to fall under this category.

3. **Non-hazardous Waste** – excavated soil with representative chemical concentrations less than State and Federal criteria. Previously undocumented, localized area(s) of soil excavated from the Project Site may fall under this category.

4. **Non-impacted Soil** – soil does not have chemical impacts that would require special handling or off-site disposal. It is anticipated that the vast majority of the soil excavated from the Project Site will fall under this category.

5.0 Notifications and Pre-Excavation Activities

5.1 General Notifications

The GC is responsible for all necessary permits and notifications to regulatory and permitting agencies associated with the project work. BMPs should be implemented by the GC to ensure compliance with the approved SWPPP and dust control plan.

5.2 Notifications for Impacted Soil

The Owner will require the General Contractor (GC) and its subcontractors to instruct and train workers to be cognizant of the potential for encountering soil contaminated by past activities and to implement measures consistent with this plan.

The Owner shall be immediately notified of any discovery of potentially impacted soil or unanticipated underground feature such as an underground storage tank (UST), septic pit, hydraulic lift component, clarifier, or other unknown feature which is suspected to potentially contain or have in the past contained hazardous substances.

In the event of any indication of impacted soil is observed (i.e., odors, staining, debris, etc.) during an excavation or other work that exposes soil, the Foreman shall immediately notify the

Owner and the Owner shall promptly obtain recommendations from a qualified environmental professional regarding any additional characterization/sampling and remedial activities that should be conducted.

The immediate notification to the Owner for reporting discoveries shall be to:

- **Primary Contact: Alex Evers, Operations Manager**
  Mobile: (626) 437-3346
  E-mail: AEvers@aypa.com

- Alternate Contact: Nate Moore, Vice President of Operations and Maintenance
  Mobile: (775) 545-2078
  E-mail: NMoore@aypa.com

5.3 Worker Education and Safety

This Revised SGMP provides information that will help to support compliance with employer obligations such as employee right-to-know, worker safety, and other regulatory programs while providing general guidelines for reducing the potential for exposure if impacted soils are encountered. However, each employer remains responsible for the health and safety of its own workers. This Revised SGMP is not intended for direct, unmodified use by employers to protect workers. Rather, it intends to provide general considerations and procedures for modification and incorporation by employers into their existing worker safety programs. The GC and environmental consultant must inform and educate their respective workers and subcontractors to be alert for new or undiscovered conditions that could potentially pose risk.

The GC, environmental consultant, and their subcontractors are required to develop and implement independent Health and Safety Plans (HASPs) during all phases of work. The HASP should be prepared by a qualified person experienced in the health and safety risks associated with the identified COCs in accordance with the Federal Occupational Safety and Health Administration (OSHA) Hazardous Waste Operators and Emergency Response (HAZWOPER) standard (29 CFR 1910.120) and Cal-OSHA standard (8 CCR 5192). The HASP should specify administrative and engineering controls and require applicable personal protective equipment (PPE) for worker safety during each stage of the Project.

6.0 Potential Impacted Soils

Based on the findings from the previous Phase I ESAs and the LSIs performed in 2025, which are summarized in Section 3.0 above, construction workers have the potential to be exposed to soil (TPH-MORO) and/or soil gas (VOCs including PCE and TCE) with concentrations that could represent a health hazard (See **Exhibit 2**). From the LSI results, metal concentrations in soil (particularly arsenic) are below DTSC accepted regional background levels.

The environmental consultant shall be onsite when substantive grading or excavations are occurring in soils not previously disturbed by project construction. The GC and environmental consultant shall implement procedures and practices to ensure that their respective workers are trained to be continually observant for potential impacted soils. The Owner, or the GC and

environmental consultant at the Owner's direction, shall provide for active, periodic field oversight including:

- Screening exposed and excavated soils:
    - Using visual indicators and instrumentation (e.g., calibrated photoionization detector) to identify potentially TPH- and VOC-impacted soils.
    - Based on visual indicators or instrumentation, potential collection of select soil samples for laboratory analysis for contaminants of concern (COCs) including TPH, VOCs, and any additional profile testing that may be required by waste disposal facilities, using EPA approved methods. At a minimum, this testing would include profiling of removed soil waste that will be transported for off-site disposal.
- Excavation, separation, and documentation of potentially impacted soils.
- If appropriate, collection of select samples for laboratory analysis (as indicated above) from:
    - Soils remaining where impacted soils have been removed.
    - Impacted soils designated for reuse, additional sampling, and/or for off-site disposal.
- Coordination and facilitation of waste profiling, transportation, and disposal.

7.0 Potential Exposure Pathways and Receptors

Exposure pathways are identified as:

- Inhalation of dust or vapors that could be generated from impacted soil.
- Dermal contact with impacted soil during excavation activities.
- Dermal contact or ingestion of groundwater.

The GC, environmental consultant, and Subcontractor HASPs and BMPs should include hazard assessment and mitigation measures to eliminate or minimize potential exposure pathways.

8.0 Soil Management

8.1 Soil Excavation Parameters

Nearly all of the project site will be graded, and most excavations will be less than 10 feet deep. Two electric tie-line support poles will require deep excavations or borings.

8.2 Waste Minimization/management

If impacted soil is encountered, it should be removed and segregated in a manner to minimize over-excavation or mixing with clean soil. Impacted soils should be removed from the Site frequently to minimize the potential for contact between stormwater and any impacted soils identified during excavation. Excavation in areas where impacted soil is encountered should be protected from stormwater run-on by clean soil berms or other diversionary features to direct

water away from any exposed impacted soils. Other BMP measures such as covering impacted soils with plastic shall be implemented to prevent or minimize stormwater contact with impacted soils.

8.3 Changed Conditions and Soil Stockpiling

The GC and subcontractors should be aware of the regulatory implications of improper management or disposal of contaminated soils. If changed conditions are encountered (i.e., petroleum hydrocarbons, USTs, or obviously impacted soils), the excavated impacted soil shall be stockpiled separately on plastic sheeting under the direction of the environmental consultant, covered with plastic sheeting, and secured with fiber rolls or equivalent until they can be properly evaluated. See **Section 5.2** for notifications. Workers in physical contact with obviously impacted environmental media should have OSHA HAZWOPER training consistent with 29 CFR 1910.120.

If chemical odors, stained or saturated soils, a sheen on water collected in excavations, detected concentrations of COCs from laboratory analysis of select soil samples, or other evidence of potential chemical contamination is encountered during excavation activities, work in the area of the discovery shall cease immediately and the Owner shall be notified. See Section 5.2 for notifications.

8.4 Waste Characterization and Disposal

If impacted soils are identified, the impacted soil shall be characterized as needed to determine which of the waste categories in Section 4.0 it fits in. If off-site disposal is required characterization will also be required by the receiving facility. Based on historical knowledge of the Site and vicinity, if impacted soils are encountered, typical waste profiling parameters, may include TPH carbon chain by EPA Method 8015M and VOCs by EPA Method 8260B. If impacted soil is excavated, proper classification is the responsibility of the Generator, which will be the Owner unless otherwise dictated by contract or state law. All impacted soil characterization and results as well as manifesting shall be coordinated with the Owner.

Only an authorized transporter can transport soils offsite. Transport and shipping documentation shall be coordinated with the Owner. Receiving facilities must be licensed to receive the types and concentrations of COCs in the soil shipment. Some licensed disposal/recycling facilities and waste transporters are listed in the **SGMP Reference Guide**. The listed facilities are not intended to be limiting.

9.0 Groundwater and Stormwater Management

If either groundwater or stormwater that has contacted impacted soils is handled during construction, management measures in this plan must be adhered to. The groundwater in the Site vicinity is anticipated to be at depths of approximately 21 to 26 fbg. Groundwater is not expected to be encountered during construction except potentially for construction of the deep foundations for the electric tie-line support poles, and potentially in borings if additional geotechnical drilling is conducted. If stormwater collects in any excavation during construction, it should be visually inspected for evidence of sheen or other indication of COC presence such as visually impacted soil in the excavation wall. If groundwater or storm water that has come in

contact with potentially impacted soils is to be removed from an excavation, the water shall be managed as potentially contaminated and evaluated through chemical analysis prior to discharge and/or off-site disposal. Samples shall be collected by a qualified person and characterization shall be coordinated with the Owner.

Produced and/or captured groundwater or stormwater that has contacted impacted soils shall be containerized in suitable portable aboveground storage tanks (ASTs) compatible with the potential COCs and properly secured to prevent unsafe exposure, contact with stormwater, or discharge to the surface, storm drains, or waterways. Secondary containment of the containerized water shall be established for volumes greater than 100 gallons and shall have a capacity of 110 percent (%) of the total volume of the containers, regardless of actual volume stored in the containers. Additional BMPs such as regular inspection of the containers and secondary containment and proper labeling shall be maintained.

9.1 Permits

Discharge of untested and/or untreated groundwater or potentially impacted stormwater to the ground surface, storm drain, or sanitary sewer system is prohibited. It is the responsibility of the GC, and/or its subcontractors to obtain the necessary permit and equipment to conduct any dewatering and discharging activities that might be needed and to ensure that required characterization (e.g., laboratory analysis of COCs using EPA-approved methods) of such water occurs under the direction of the environmental consultant. Impacted water must be managed in accordance with applicable waste regulations. Impacted water may be shipped off-site by a licensed hauler to a permitted treatment facility or treated on-site and discharged under a valid permit. Water generated may be temporarily stored on-site in ASTs, as described above, pending necessary permitting, testing, and/or treatment. Some licensed disposal/recycling facilities and waste transporters are identified in the SGMP Reference Guide. The listed options are not intended to be limiting.

Project construction will need to occur under the State Water Resources Control Board Construction General Permit Order 2022-0057-DWQ, adopted September 8, 2022, effective September 1, 2023.

9.2 Sampling and Testing Groundwater or Stormwater

If either groundwater or stormwater that has contacted impacted soils must be handled, the GC will ensure that sampling and testing occur in accordance with applicable regulations as directed by the environmental consultant. All sampling shall be conducted by qualified personnel. Samples shall be collected in laboratory-provided pre-cleaned, EPA-approved sample containers, transported to an accredited laboratory in a cooler with ice, and shipped with chain-of-custody documentation. Based on the known potential chemicals of concern, if groundwater is pumped, samples shall be collected and analyzed pursuant to regulatory permit requirements, and may include TPH by EPA Method 8015M and VOCs by EPA Method 8260B. Additional sampling and analysis may be required for waste characterization or discharge to local sanitary sewer system and/or storm drain according to applicable permit requirements, such as general chemistry, pH, and temperature.

10.0 Additional Project Controls

The following additional control measures, or measures with similar of greater effectiveness, shall be implemented to limit the potential for worker or public exposure to impacted soils, if present.

10.1 Dust Control Measures

The GC will be responsible for controlling dust in accordance with SCAQMD requirements. A Dust Control Permit and a Dust Mitigation Plan may be required. Supplemental permits may also be needed for activities such as (but not limited to) stockpiling, backfilling, or crushing, etc. A complete list of the necessary supplemental permits typically is available on the SCAQMD web as follows:

http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/fugitive-dust.

The GC will be responsible for the preparation of and adherence to the Dust Mitigation Plan, as well as adhering to other pertinent requirements referenced.

10.2 Stormwater Quality Controls

Project construction will require coverage under State Water Resources Control Board Construction General Permit Order 2022-0057-DWQ for storm water discharges from construction sites. The Owner will hold the General Permit and will require the GC to comply with the permit and with the SWPPP required by the permit. The SWPPP will be prepared by a Qualified SWPPP Developer and will include BMPs to prevent stormwater contact with potential contaminants site-wide. The SWPPP will be complementary to this Revised SGMP, and the GC and subcontractor work and environmental consultant directives will be required to follow applicable BMPs from both if impacted soil or groundwater is managed.

11.0 Documentation

Upon completion of Site excavation activities and receipt of any necessary laboratory analytical results and waste manifest documentation, the GC and/or environmental consultant shall prepare a report that will include:

- Field Logs or Activities Summaries and photo-documentation related to any encounters of impacted soil or water.
- Tabulated summary of samples taken.
- Laboratory results for testing of soil and groundwater samples, and characterization of wastes, if any.
- Site map indicating sample locations and limits of contamination encountered, if any.
- Waste profile forms, if any.
- Waste manifests for soil and water transported off-site for disposal and/or recycling, if any.

12.0 Limitations

This Revised SGMP has been developed to inform the GC, environmental consultant, and subcontractors of the potential for encountering contaminated soil or water during excavation activities at the Site. If encountered, impacted soil or water could contain COCs at concentrations that could present a health hazard to construction personnel via dermal contact, inhalation of dust or vapors, or accidental ingestion. The measures herein are intended to inform the GC, environmental consultant, and subcontractors of the potential for impacted soil or groundwater to be encountered and to provide general guidance and project-specific requirements for management of impacted soil, stormwater that has contacted impacted soil, or groundwater. It is not intended to fulfill any GC, environmental consultant, or subcontractor obligation for worker health and safety, waste management, or environmental protection. The GC, environmental consultant, and its subcontractors engaged in activities at the project are responsible for conducting Site activities in accordance with all applicable federal, state, and local environmental and safety regulations. Additionally, since there are no known impacted soils on the Project site and this plan is primarily oriented toward the discovery of currently unknown conditions, this plan should be updated during construction in the event any such need is identified.

13.0 References

Partner Engineering and Science, Inc. (Partner), 2017, *Phase I Environmental Site Assessment Report*, prepared for Morgan Stanley Mortgage Capital Holdings, LLC, for the property located at 16253-16293 East Gale Avenue, City of Industry, Los Angeles County, California 91475; dated December.

Terracon Consultants, Inc. (Terracon) 2023, *Phase I Environmental Site Assessment Report*, prepared for Aypa Power Development, LLC, for the Marici - City of Industry Battery Energy Storage System (BESS) Project located at 16253-16293 East Gale Avenue, City of Industry, Los Angeles County, California 91475; dated November 1 (Revised November 21).

Terracon Consultants, Inc.(Terracon) 2024, *Phase I Environmental Site Assessment Report,* prepared for Aypa Power Development, LLC, for the Marici - City of Industry Battery Energy Storage System (BESS) Project located at 16253-16293 East Gale Avenue, City of Industry, Los Angeles County, California 91475; dated August 23.

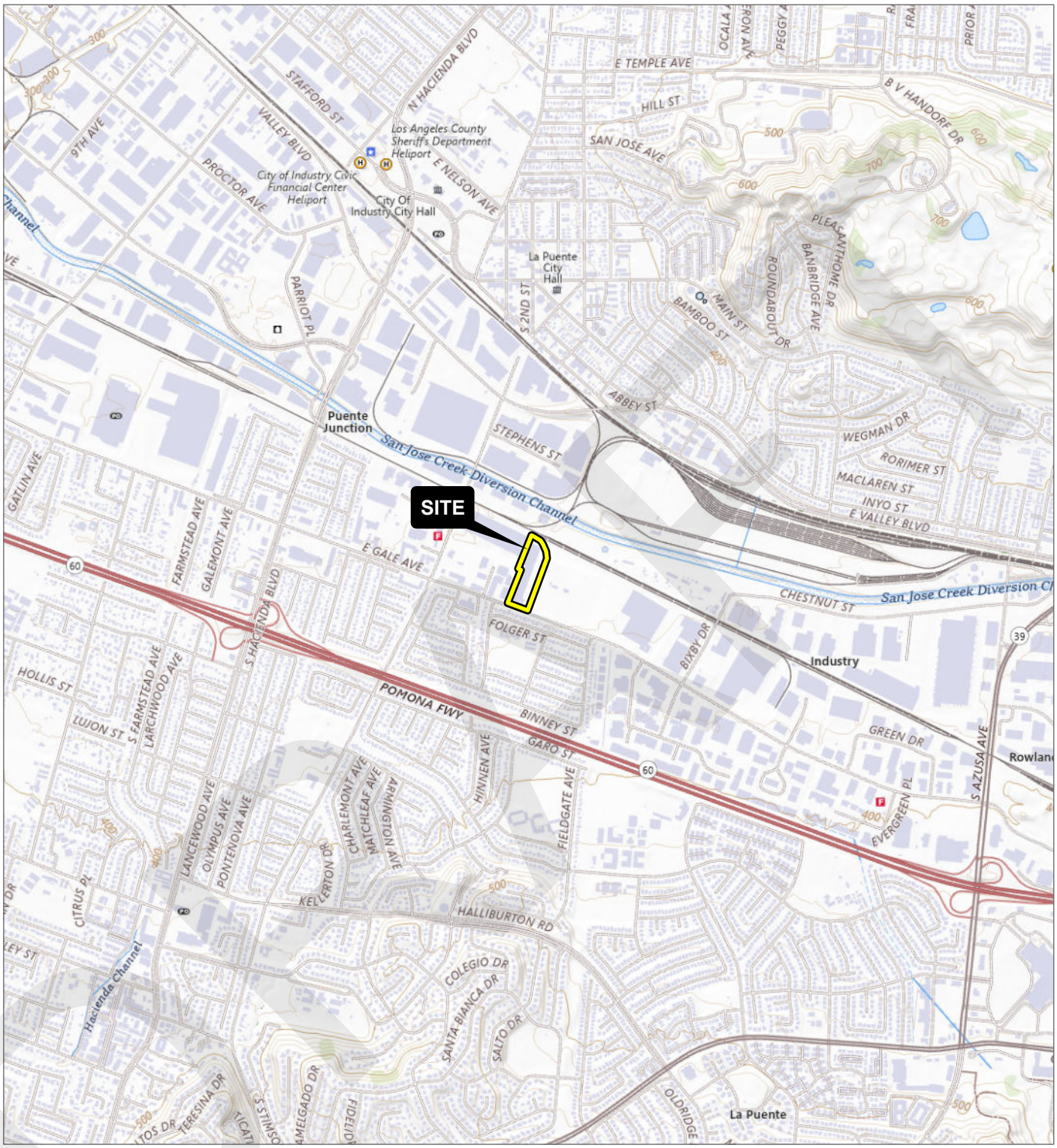
Terracon Consultants, Inc.(Terracon) 2025a, *Phase I Environmental Site Assessment Report,* prepared for Aypa Power Development, LLC, for the Marici - City of Industry Battery Energy Storage System (BESS) – 16233 Gale Avenue Project located at 16233 and 16235 Gale Avenue, City of Industry, Los Angeles County, California 91475; dated January 7.

Terracon Consultants, Inc.(Terracon) 2025b, *Phase I Environmental Site Assessment Report,* prepared for Aypa Power Development, LLC, for the Marici - City of Industry Battery Energy Storage System (BESS) – 16207 Gale Avenue Project located at 16207 and 16209 Gale Avenue, City of Industry, Los Angeles County, California 91475; dated January 27.

Terracon Consultants, Inc.(Terracon) 2025c, *Limited Site Investigation Report,* prepared for Aypa Power Development, LLC, for the Marici - City of Industry Battery Energy Storage System (BESS) – 16207 Gale Avenue Project located at 16207 and 16209 Gale Avenue, City of Industry, Los Angeles County, California 91475; dated March 26.

Terracon Consultants, Inc.(Terracon) 2025d, *Limited Site Investigation Report,* prepared for Aypa Power Development, LLC, for the Marici - City of Industry Battery Energy Storage System (BESS) – 16233 Gale Avenue Project located at 16233 and 16235 Gale Avenue, City of Industry, Los Angeles County, California 91475; dated March 26.

Attachment A: Exhibit 1 – Vicinity Map
Exhibit 2 – Site Diagram



PROPERTY BOUNDARY

BASE MAP: USGS 7.5' QUADRANGLES : BALDWIN PARK(34117-A8)
DATA SOURCES: TRC

0 1,000 2,000
FEET
1:24,000 1" = 2,000'

PROJECT: AYPA POWER DEVELOMENT LLC
MARICI - CITY OF INDUSTRY BESS
16253-16293 GALE AVENUE
LOS ANGELES COUNTY, CALIFORNIA

TITLE: VICINITY MAP

DRAWN BY:	R. COLLINS	PROJ. NO.:	604109.1PPL.0000
CHECKED BY:	J. MALDONADO		
APPROVED BY:	J. TROMPETER		EXHIBIT 1
DATE:	MAY 2025		

TRC
13810 SE EASTGATE WAY
SUITE 440
BELLEVUE, WA 98005
PHONE: 425.395.0010

FILE: MARICI_EXHIBITS

COORDINATE SYSTEM: NAD 1983 STATEPLANE CALIFORNIA V FIPS 0405 FEET: MAP ROTATION: 0
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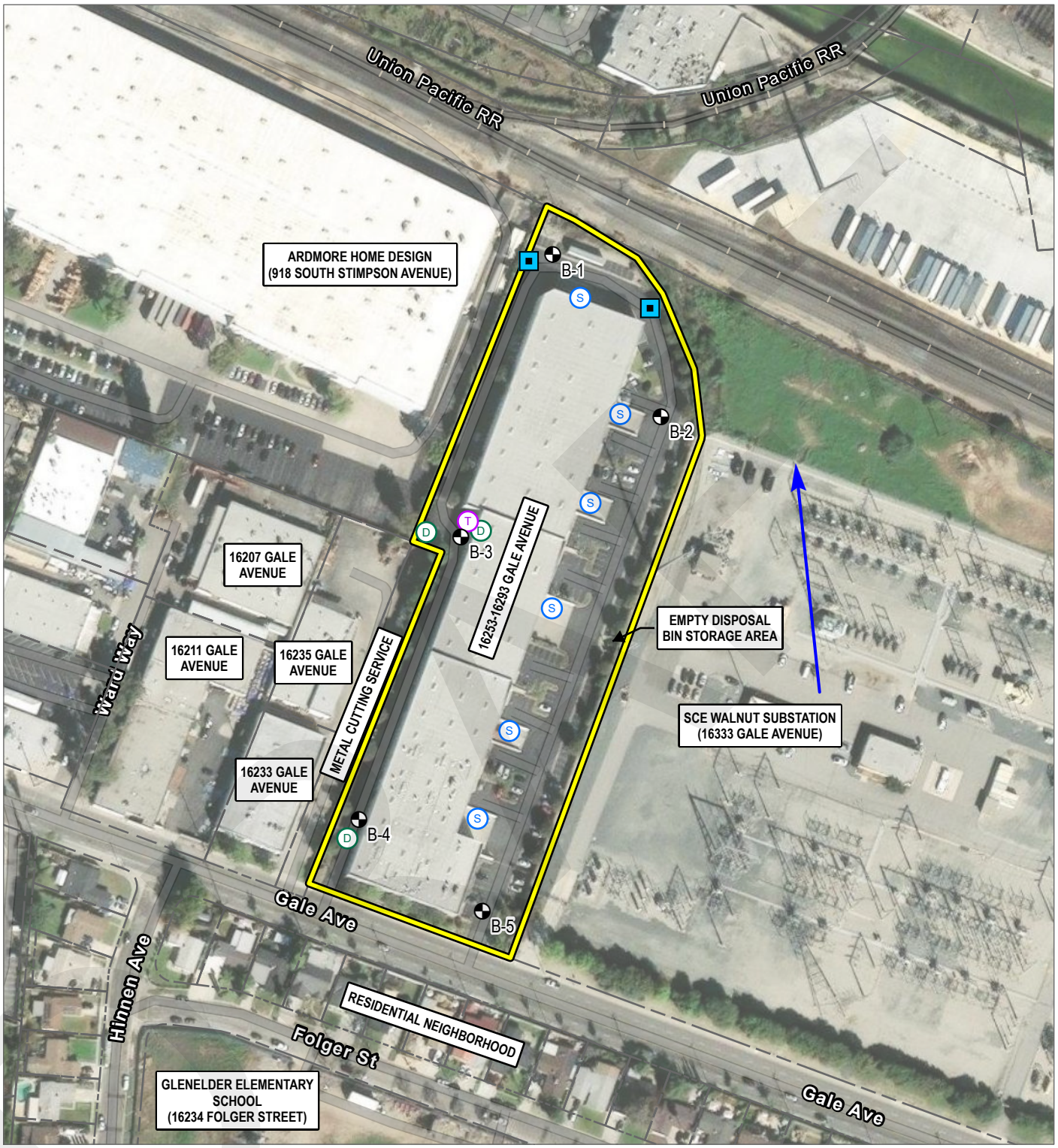


LEGEND

- PROPERTY BOUNDARY
- BORING LOCATIONS FROM 2023 TERRACON GEOTECHNICAL INVESTIGATION (LA235125)
- (D) SOLID WASTE DISPOSAL BINS
- (T) TRANSFORMER (PAD MOUNT)
- (S) SUMP/PUMP
- STORM CURB INLET
- ANTICIPATED GROUNDWATER FLOW DIRECTION

BASE MAP: GOOGLE SATELLITE IMAGERY
DATA SOURCES: TRC

N

0 100 200
FEET
1:2,400 1" = 200'

PROJECT: AYPA POWER DEVELOMENT LLC
MARICI - CITY OF INDUSTRY BESS
16253-16293 GALE AVENUE
LOS ANGELES COUNTY, CALIFORNIA

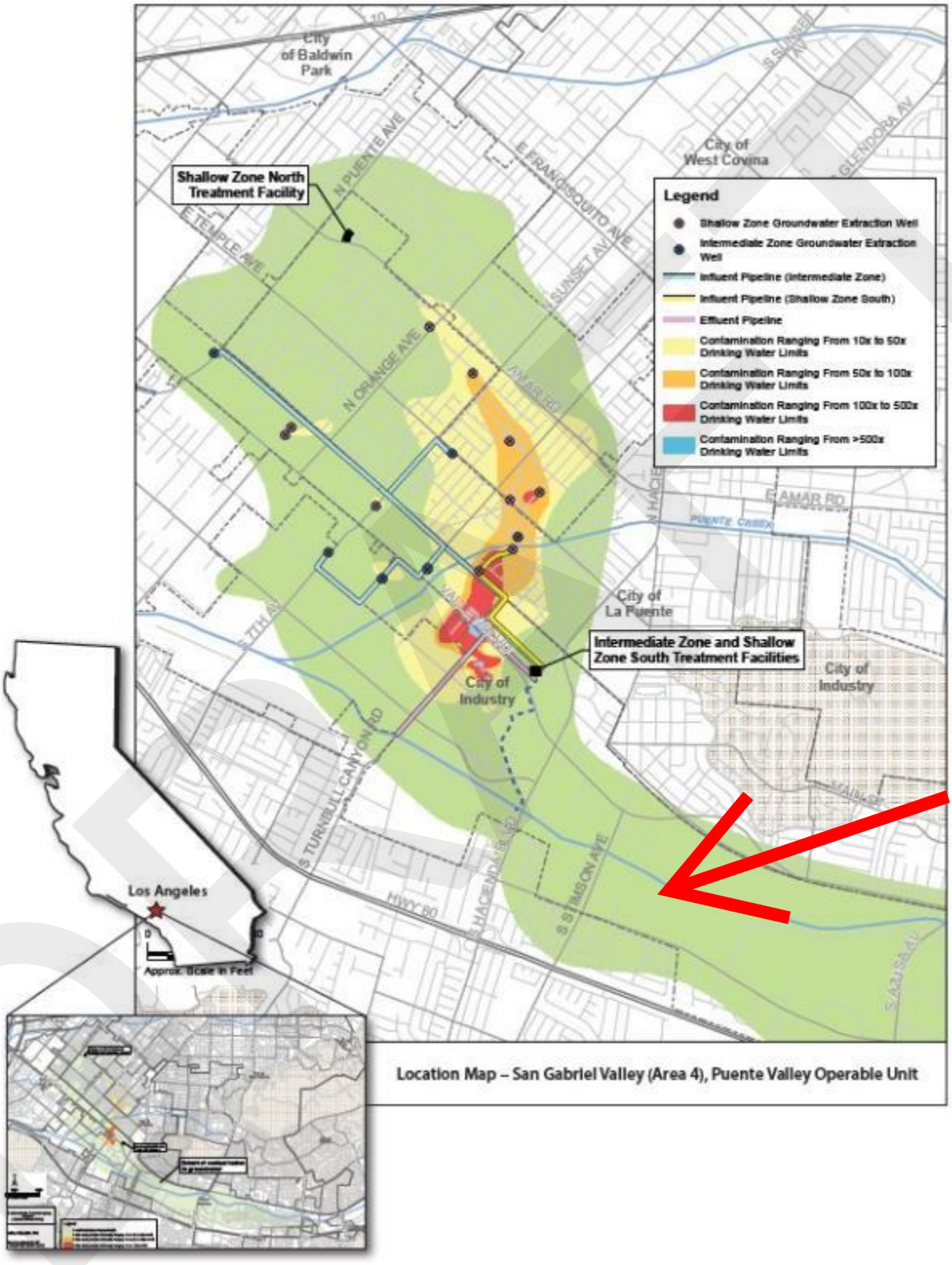
TITLE: SITE DIAGRAM

DRAWN BY:	R. COLLINS	PROJ. NO.:	604109.1PPL.0000
CHECKED BY:	J. MALDONADO		
APPROVED BY:	J. TROMPETER		EXHIBIT 2
DATE:	MAY 2025		

TRC
13810 SE EASTGATE WAY
SUITE 440
BELLEVUE, WA 98005
PHONE: 425.395.0010

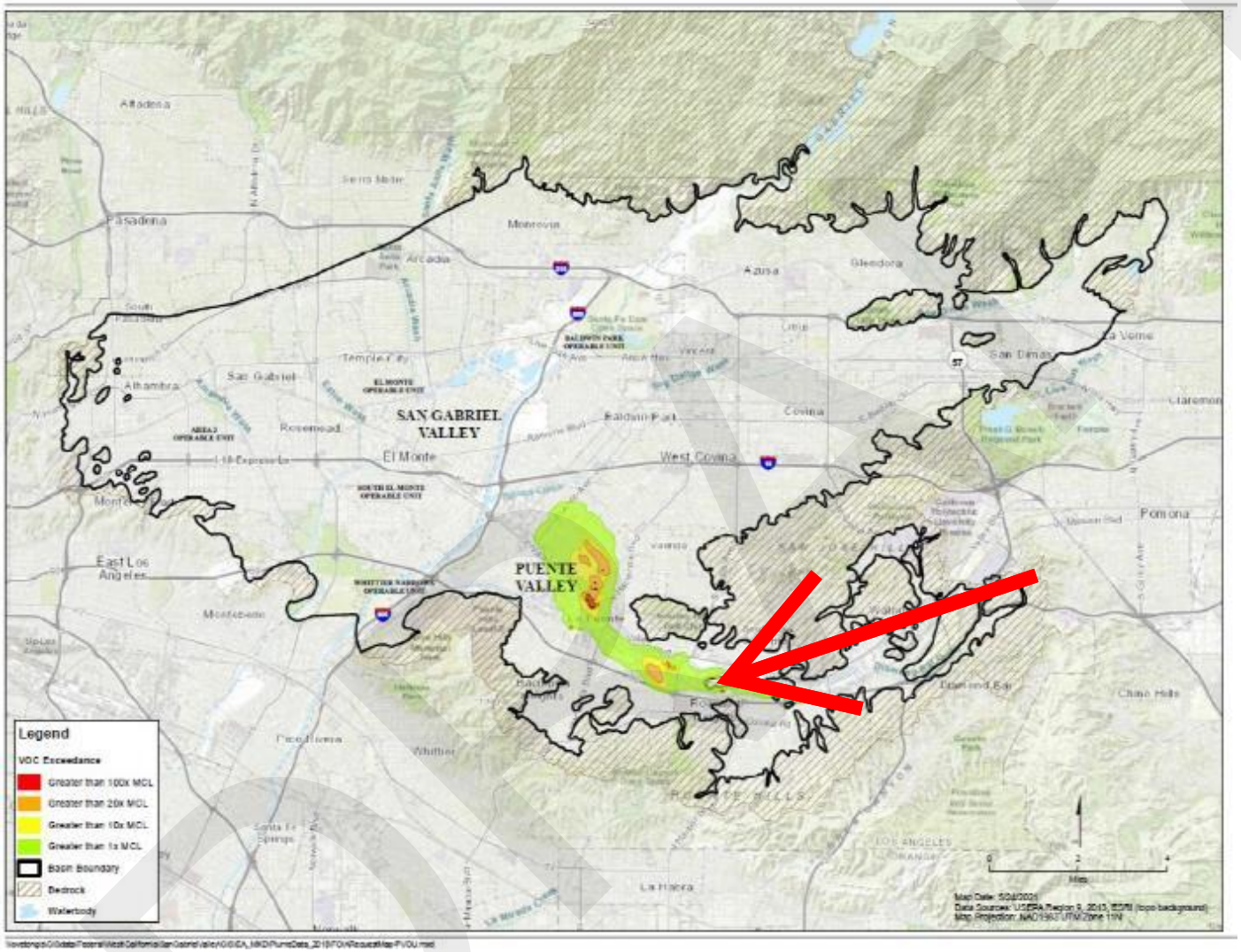
FILE: MARICI_EXHIBITS

Attachment B: San Gabriel Valley Regional Groundwater Plume Maps



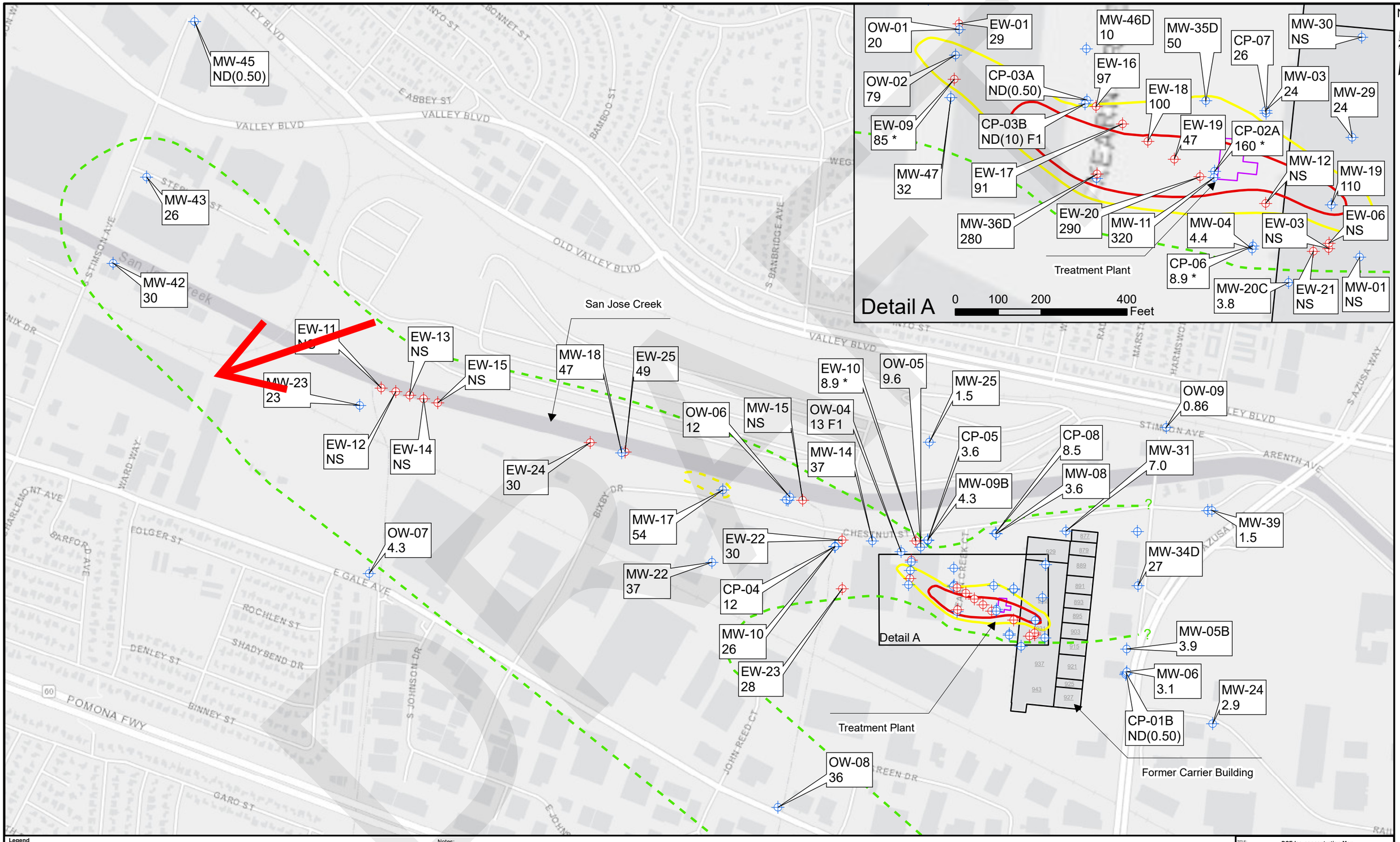
Source: EPA, 2021.

Figure 2. Detailed Map of San Gabriel Valley Area 4



Source: EPA, 2021.

Figure 3. San Gabriel Groundwater Basin



Legend

- 20 Times to 100 Times the MCL PCE Isoconcentration (100-500 µg/L)
- Inferred 20 Times to 100 Times the MCL PCE Isoconcentration (100-500 µg/L)
- 10 Times to 20 Times the MCL PCE Isoconcentration (50-100 µg/L)
- Inferred 10 Times to 20 Times the MCLMCL PCE Isoconcentration (50-100 µg/L)
- MCL to 10 Times the MCL PCE Isoconcentration (5-50 µg/L)
- Inferred MCL to 10 Times the MCL PCE Isoconcentration (5-50 µg/L)
- Groundwater Monitoring Well
- Groundwater Extraction Well
- NS = Not Sampled (insufficient water level/ Inopreable extraction well)
- 929 Unit Address

Notes:
MCL – Maximim Contaminant Level
µg/L – Micrograms per liter
PCE – Tetrachloroethene
* - Laboratory control spike or laboratory control spike duplicate is outside acceptance limits.
F1 - Matrix spike and/or matrix spike duplicate recovery exceeds control limits.

0 300 600 1,200 Feet

K-23

TITLE:	PCE Iso-concentration Map Shallow Transmissive Zone November 2020
LOCATION:	Former Carrier Corporations Facility City of Industry, California
TETRA TECH	APPROVED: JG DRAFTED: TM PROJECT#: 117-2210112 DATE: 06-20-2019 FIGURE: 14

Document Path: M:\GIS\Carrier\CAO figures\2020 Q4 CAO\Figure 14 PCE Shallow Transmissive Zone.mxd