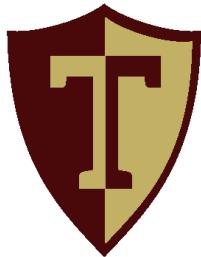


## **APPENDIX E**

*Phase I Environmental Site Assessment*



**TARGUS**  
ENVIRONMENTAL

**Prepared for:**

**2655 Campus POP Owner, LLC  
2755 Campus POP Owner, LLC  
2800 Campus POP Owner, LLC  
2929 Campus POP Owner, LLC  
2955 Campus POP Owner, LLC  
2988 Campus POP Owner, LLC  
c/o Invesco Advisers, Inc.  
2001 Ross Avenue, Suite 3400  
Dallas, Texas 75201**

**Prepared by:**

**Targus Associates, LLC  
Dallas, Texas**

**REPORT OF PHASE I  
ENVIRONMENTAL SITE ASSESSMENT  
AND ADDITIONAL ENVIRONMENTAL SERVICES**

**Peninsula Office Park  
2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo, San Mateo County, California 94403**

**Targus Project T18-3719**

**May 22, 2018**



May 22, 2018

2655 Campus POP Owner, LLC  
2755 Campus POP Owner, LLC  
2800 Campus POP Owner, LLC  
2929 Campus POP Owner, LLC  
2955 Campus POP Owner, LLC  
2988 Campus POP Owner, LLC  
c/o Invesco Advisers, Inc.  
2001 Ross Avenue, Suite 3400  
Dallas, Texas 75201

Attention: Mr. Scott Ballard

Subject: **Report of Phase I Environmental Site Assessment  
and Additional Environmental Services  
Peninsula Office Park  
2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo, San Mateo County, California 94403  
Targus Project T18-3719**

Dear Mr. Ballard:

Targus Associates, LLC (Targus) is pleased to submit this report of the Phase I Environmental Site Assessment and Additional Environmental Services for the Peninsula Office Park, located at 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive in San Mateo, San Mateo County, California. This report discusses background information, purpose and scope of work, execution of work, and conclusions.

ASTM E 1527-13 states that an ESA "meeting or exceeding" this practice and completed less than 180 days prior to the date of acquisition or intended transaction is presumed to be valid if the report is being relied on by the *user* for whom the assessment was originally prepared and the following components were completed: interviews, searches for recorded environmental cleanup liens, regulatory review, site visit, and the declaration by the environmental professional responsible for the assessment. Based on this requirement, this report is presumed to be valid for 180 days after May 2, 2018.

We appreciate your selection of Targus for this project and look forward to assisting you further on other projects. If you have any questions, please do not hesitate to contact either of the undersigned.

Sincerely,  
**Targus Associates, LLC**

A handwritten signature in blue ink that appears to read "David Short".

David Short  
Associate Professional

A handwritten signature in blue ink that appears to read "Kelly Knight".

Kelly Knight  
Project Professional

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## Appendices

### Appendix A - Figures:

- Topographic Map
- Site Plan
- Site (Vicinity) Map

### Appendix B - Photographs

### Appendix C - Historical Research Documentation

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### Appendix E - Interview Documentation

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### Appendix G - Information Requested from Client/Excerpts from Documents Provided by the Client or Others

## 1.0 SUMMARY

Peninsula Office Park  
2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo, San Mateo County, California

On behalf of 2655 Campus POP Owner, LLC, 2755 Campus POP Owner, LLC, 2800 Campus POP Owner, LLC, 2929 Campus POP Owner, LLC, 2955 Campus POP Owner, LLC, and 2988 Campus POP Owner, LLC, Invesco has engaged Targus Associates, LLC (Targus) to perform a Phase I Environmental Site Assessment (ESA) and Additional Environmental Services of the Peninsula Office Park, located at 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive in San Mateo, San Mateo County, California (subject property). The subject property encompassed approximately 26 acres of land and was improved with six office buildings totaling approximately 450,000 square feet (sf), a parking structure, concrete and asphalt parking lots, and limited landscaped areas. Construction dates of the on-site improvements ranged from 1971 (2988 Campus Drive) to 1998 (2955 Campus Drive). The occupant of the subject property was Peninsula Office Park. The subject property was located in an area characterized by single-family and multifamily residences, office buildings, commercial/ retail businesses, a golf course, vacant/ wooded land, and Beresford Creek.

Based on the information obtained to date, Targus' findings, opinion, and conclusions are as follows:

- The results of Targus' subject property and area reconnaissance did not indicate *recognized environmental conditions* associated with observed subject property or surrounding land use.
- Review of historical and regulatory agency information did not indicate on-site or off-site sources of *recognized environmental conditions* associated with recent or historical subject property or surrounding land use.
- Targus conducted additional services in accordance with the proposed scope of work, including the assessment of those enumerated in Section 8.0.

### 1.1 ASTM Services

Targus has performed a Phase I ESA of Peninsula Office Park, located at 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive in San Mateo, San Mateo County, California in general conformance with the scope and limitations of ASTM Practice E 1527-13 and the authorized scope of work. Exceptions to, or deletions from, this practice are described in Section 7.3 of this report.

Based upon the information obtained, as reflected in this report, this assessment has revealed no evidence of *recognized environmental conditions* in connection with the subject property.

### 1.2 NON-ASTM SERVICES

In accordance with the proposed scope of work, Targus conducted additional environmental services as discussed in Section 8.0 of this report. Based on Targus' understanding of the Client's objectives, risk tolerance, and future plans for the subject property, this assessment/

review did not identify *business environmental risk* associated with the additional environmental services performed; however, this conclusion is specifically conditional on proper future management of suspect and confirmed asbestos-containing materials (ACM) in accordance with applicable regulations.

This summary is for convenience only and should not be relied upon without first reading the full contents of this report, including appendix materials<sup>1</sup>.

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<sup>1</sup> Irrespective of verb tense used in the text, this report is considered to be written and effective as of the date of the site visit.

## 2.0 INTRODUCTION

### 2.1 LOCATION AND LEGAL DESCRIPTION

The subject property was located at 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive in San Mateo, San Mateo County, California. Figures depicting the subject property are located in the appendices. An ALTA/ACSM land title survey for the subject property was provided via an online document repository. The boundaries indicated on Targus' site plan were identified on the provided survey and tax appraisal district website and were confirmed by the site contact.

#### 2.1.1 Subject Property and Vicinity General Characteristics

The subject property and area reconnaissance, performed on May 10, 2018, consisted of visual observations made during a foot and vehicular tour of the subject property and adjoining land areas. The area reconnaissance was performed on foot within areas that were reasonably accessible and at Targus' discretion by automobile along publicly accessible roads. Targus' area reconnaissance observations are described in Section 2.1.4, and subject property observations are described in Section 5.0.

#### 2.1.2 Observed Use of the Subject Property

The subject property was used as a campus of multitenant office buildings. Targus noted that each tenant space typically consisted of offices where administrative and/or sales activities were conducted. Information concerning tenants located at the subject property at the time of Targus' site visit is presented in the following table.

Building Number/ Address <sup>2</sup>	Suite Number	Tenant	SREC Y/N	If Yes, Section Discussed
POP 1: 2988 Campus Drive	100, 110, 115, 200	AtHoc (Blackberry)	N	N/A
	300	Vindicia	N	N/A
POP 3: 2800 Campus Drive	100	Sitecore USA Inc.	N	N/A
	125	Hudson Pacific Properties	N	N/A
	135	Nlyte Software Americas	N	N/A
	150	Rael & Letson	N	N/A
	200	American Institutes for Research (AIR) in the Behavioral Sciences	N	N/A
	100	InClin, Inc.	N	N/A
POP 4: 2655 Campus Drive	125	DJI Creative Studio LLC	N	N/A
	200	Trinet HR Corporation	N	N/A
	100	Icefield Capital	N	N/A
POP 5: 2755 Campus Drive	115	Infovity	N	N/A
	125	First American Title Company	N	N/A
	130	Universal Electronics	N	N/A
	150	Verisae	N	N/A
	165	Argyle Data	N	N/A
	175	2D3, Inc.	N	N/A
	210	Shay Glenn	N	N/A
	220	Code 42 Software	N	N/A
	240	KKR Accounting Services	N	N/A

<sup>2</sup> The names of the buildings (POP 1, POP 3, etc...) were designated by Peninsula Office Park.

Building Number/ Address <sup>2</sup>	Suite Number	Tenant	SREC Y/N	If Yes, Section Discussed
POP 8: 2929 Campus Drive	300	Clarizen	N	N/A
	101, 300	NetSuite	N	N/A
	145	Scalyr	N	N/A
	200	Afferent Pharmaceuticals	N	N/A
	225	Sensiba San Filippo	N	N/A
	250	Orchestra	N	N/A
	405	Healthmine Services	N	N/A
	410	Mavericks Capital	N	N/A
	415	Enfos, Inc.	N	N/A
	420	Fisher Lynch Capital	N	N/A
POP 9: 2955 Campus Drive	100, 110, 120, 200, 300, 400	NetSuite	N	N/A
	101	Campus Cafe	N	N/A

### 2.1.3 Descriptions of Structures, Roads, Other Improvements on the Subject Property

The subject property encompassed approximately 26 acres of land and was improved with six office buildings totaling approximately 450,000 square feet (sf), a parking structure, concrete and asphalt parking lots, and limited landscaped areas. Construction dates of the on-site improvements ranged from 1971 (2988 Campus Drive) to 1998 (2955 Campus Drive). No other paved roadways or other structures were located on-site.

### 2.1.4 Observed Uses of the Adjoining Properties

Observed uses of adjoining properties are discussed as follows according to their respective geographic relationship to the subject property. Historical use of the adjoining properties is discussed in Section 4.4.

#### Northwest

The subject property was bordered to the northwest by single-family residences.

#### North

The subject property was bordered to the north by the Peninsula Golf and Country Club.

#### Northeast

The subject property was bordered to the northeast by Campus Drive, followed (from northwest to southeast) by a United States Postal Services (USPS) facility and a vacant office building.

#### East

The subject property was bordered to the east by vacant, wooded land and Beresford Creek.

#### South

The subject property was bordered to the south (from east to west) by vacant wooded land, Oak View Apartments, and Campus Drive (followed by a multitenant retail strip center).

West

The subject property was bordered to the west (from south to north) by Campus Drive and Live Oak Drive, followed by vacant land, followed by the J. Arthur Younger Freeway.

Central

The three parcels that comprise the subject property were centrally adjoined by a multitenant office building (located on the Peninsula Office Park campus, however not part of the subject property assessed by Targus).

## 2.2 CONTRACTUAL DETAILS

### 2.2.1 Purpose

The purpose of this Phase I Environmental Site Assessment (ESA) was to identify *recognized environmental conditions* in connection with the subject property. As defined by ASTM E 1527-13, “The term *recognized environmental conditions* means the presence or likely presence of any *hazardous substances or petroleum products* in, on, or at a *property*: (1) due to any *release* to the *environment*; (2) under conditions indicative of a *release* to the *environment*; or (3) under conditions that pose a *material threat* of a future *release* to the *environment*.” The presence of *hazardous substances or petroleum products* considers substances present in any form or phase, whether solid, liquid, or gas, at the surface or subsurface in soil, water, or vapor.

The term *historical recognized environmental condition* applies to “a past *release* of any *hazardous substances or petroleum products* that has occurred in connection with the *property* and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, *property use restrictions, activity and use limitations, institutional controls, or engineering controls*). Before calling the past *release* a *historical recognized environmental condition*, the *environmental professional [EP]* must determine whether the past *release* is a *recognized environmental condition* at the time the *Phase I Environmental Site Assessment* is conducted (for example, if there has been a change in the regulatory criteria). If the EP considers the past *release* to be a *recognized environmental condition* at the time the Phase I ESA is conducted, the condition shall be included in the conclusions section of the report as a *recognized environmental condition*.”

Similarly, a *controlled recognized environmental condition* is “a *recognized environmental condition* resulting from a past *release* of *hazardous substances or petroleum products* that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with *hazardous substances or petroleum products* allowed to remain in place subject to the implementation of controls (for example, *property use restrictions, activity and use limitations, institutional controls, or engineering controls*). A condition considered by the *environmental professional* to be a *controlled recognized environmental condition* shall be listed in the findings section of the *Phase I Environmental Site Assessment report*, and as a *recognized environmental condition* in the conclusions section of the *Phase I Environmental Site Assessment report*.”

A *de minimis condition* is “a condition that generally does not present a threat to human health or the *environment* and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions

determined to be *de minimis conditions* are not *recognized environmental conditions* nor *controlled recognized environmental conditions*."

The term suspect *recognized environmental condition* as used throughout this report is cited from Section 12.5 of ASTM E 1527-13. Targus uses this term for conditions that have a potential to be known *recognized environmental conditions*, *controlled recognized environmental conditions*, *historical recognized environmental conditions*, or *de minimis conditions* and warrants further discussion as presented within the text of this report. Section 7.0 summarizes each of the known or suspect *recognized environmental conditions* associated with the subject property and presents Targus' opinion of the potential impact a known or suspect *recognized environmental condition* has on the subject property and whether or not the suspect *recognized environmental condition* is currently a *de minimis condition*, a *recognized environmental condition*, a *controlled recognized environmental condition* or a *historical recognized environmental condition*, based on site-specific characteristics.

ASTM E 1527-13 states that an ESA "meeting or exceeding" this practice and completed less than 180 days prior to the date of acquisition or intended transaction is presumed to be valid if the report is being relied on by the *user* for whom the assessment was originally prepared. The components of the practice to be completed within 180 days include: interviews, searches for recorded environmental cleanup liens, regulatory review, site visit and the declaration by the environmental professional responsible for the assessment. The ASTM E 1527-13 practice also states that within this 180 day period, if the assessment will be used by a *user* different than whom the assessment was originally prepared, the subsequent user must also satisfy the *user's* responsibilities.

## 2.2.2 Detailed Scope-of-Services

The scope of services was performed in general conformance with the ASTM E 1527-13 document *Standard Practice for Environmental Site Assessment: Phase I Environmental Site Assessment Process*<sup>3</sup> and Client-specified requirements (see Section 2.2.5).

The Phase I ESA consisted of a historical review of the subject property and area use, regulatory database review, assessment of the physical setting, subject property and area reconnaissance, and a report of Targus' findings, opinions, and conclusions. Data gaps or deviations from this standard, if applicable, are described in Section 7.3.

### Subject Property and Area Use

Using selected sources of reasonably ascertainable public information, Targus attempted to review recent and historical uses of the subject property. The Phase I ESA historical review extends back until 1940 or, for uses prior to that date, back to the time the subject property was undeveloped. Sources of historical use information relating to the subject property and its adjoining properties were acquired and reviewed according to the reasonable availability of the information, the time limits provided for data acquisition and review, as permitted, by the project schedule and cost, and Targus' judgment of the likely value of the information for indicating environmental conditions. Historical sources reviewed by Targus are listed in

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<sup>3</sup> ASTM E 1527-13 is incorporated by reference; Targus can assist the Client with obtaining a copy upon request. It should be noted that the ASTM standard is not intended to represent or replace the standard of care by which the adequacy of a given professional service must be judged, nor should the document be applied without consideration of a project's many unique aspects. The word "Standard" in the title of the document means only that the document has been approved through the ASTM consensus process.

Section 9.0 and typically include local city directories, aerial photographs, and a topographic map. If available through the database provider, the historical sources reviewed also included Fire Insurance Maps.

#### Regulatory Status Review

Targus reviewed a report of select regulatory databases published for the local area to identify facilities potentially constituting a suspect *recognized environmental condition* in regard to the subject property. Targus reviewed the databases to identify recorded facilities located on, or in proximity to, the subject property using the ASTM E 1527-13 standard environmental record sources and recommended approximate minimum search distances.

Targus attempted to obtain additional information regarding listed facilities that, in its professional judgment, may constitute *recognized environmental conditions* in connection with the subject property. In addition, local agencies were contacted regarding recorded information, incidents, or activities of environmental concern relating to the subject property and its immediate environs.

#### Subject Property Physical Setting

Targus obtained and reviewed reasonably ascertainable published subject property information to characterize the physical setting of the subject property. Sources reviewed are listed in Section 9.0 of this report. If reasonably ascertainable, Targus reviewed the *USGS 7.5 Minute Topographic Map* showing the area on which the subject property is located. Targus reviewed one or more physical setting sources at the discretion of the environmental professional to obtain information about the geological, hydrogeological, hydrological, and/or topographical characteristics of the subject property. Discretionary physical setting sources may have been sought if: (1) conditions had been identified in which hazardous substances or petroleum products are likely to be present on-site or to migrate to the subject property from off-site sources; and (2) more information is generally obtained, pursuant to local good commercial or customary practice.

#### Subject Property and Area Reconnaissance

The subject property reconnaissance consisted of field observations of the subject property and adjoining land areas by Targus personnel experienced in environmental site assessments. Targus observed and documented uses of the subject property and searched for indicators of hazardous substances, petroleum products, storage tanks, odors, pools of liquid, drums, containers, liquid polychlorinated biphenyls<sup>4</sup> (PCBs), heating and cooling systems, stains, corrosion, drains and sumps, pits, ponds, lagoons, stressed vegetation, wastes, wells, and septic systems. The area reconnaissance was performed on foot within areas that were reasonably accessible and at Targus' discretion by automobile along publicly accessible roads.

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<sup>4</sup> A limited assessment of the presence of polychlorinated biphenyls (PCBs) is included in the ASTM work scope. Accordingly, our assessment of the presence of PCBs is limited to those potential sources specified in the ASTM E 1527-13 Standard as "electrical or hydraulic equipment known or likely to contain PCBs...to the extent visually and or physically observed or identified from the interview or records review." Note that PCBs may be present in miscellaneous building materials such as caulking, sealants, insulation and sound dampening materials, paint, gaskets, roofing and siding materials, waterproofing compounds and enamel coatings manufactured prior to 1979. Evaluating the subject site building for potential PCB-containing building materials was outside the scope of this Phase I.

### Additional Services

As requested by the Client, Targus conducted certain specified additional services in an attempt to identify *business environmental risk* associated with the subject property. As defined by ASTM E 1527-13, the term *business environmental risk* is a potential environmental condition or environmentally-driven financial impact that could materially affect the identified or planned use of the subject property. These conditions are not necessarily limited to those environmental issues required to be assessed under ASTM E 1527-13. Rather, consideration of *business environmental risk* typically is associated with one or more Client-specified, non-ASTM scope assessment activities such as described in Section 8.0 of this report.

### Report

Targus has prepared this report, which includes the findings concerning known or suspect *recognized environmental conditions* and an opinion as to the potential impact those conditions would have on the subject property. Targus' services also included assessment of *recognized environmental conditions* or other issues that may constitute potential *business environmental risks* at the time of the Phase I ESA. Finally, this report concludes whether or not the assessment revealed *recognized environmental conditions*, or *business environmental risks*, and provides recommendations, if appropriate.

#### 2.2.3 Significant Assumptions

Targus relied on information obtained from the Client, the Client's representative, individuals interviewed, and prior environmental reports unless Targus' reasonable inquiries clearly revealed otherwise<sup>5</sup>.

Conditions observed were considered to be representative of areas that were not observed unless otherwise indicated.

An explanation of our understanding of groundwater can be found in Section 4.2.

#### 2.2.4 Limitations and Exceptions

The findings and opinions presented are relative to the dates the work was conducted and should not be relied on to represent conditions at later dates. The opinions included herein are based on information obtained during the assessment and Targus' experience. If additional information becomes available that may impact Targus' environmental assessment findings, Targus requests the opportunity to review the information, reassess the potential concerns, and modify Targus' opinions, if warranted.

This assessment included visual observations to identify obvious features or conditions indicative of *recognized environmental conditions*.

Although this assessment has attempted to identify *recognized environmental conditions*, Targus cannot eliminate all uncertainty as to *recognized environmental conditions* in connection with the subject property nor represent or warrant that the subject property contains no hazardous substances or petroleum products or other latent conditions beyond those identified through the scope of work identified herein. Other features, conditions, and constituents may have escaped detection due to: (1) the limited scope of this assessment as

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<sup>5</sup> Pursuant to ASTM E1527-13 Section 7.5.2.1.

driven by Client objectives; (2) the inaccuracy of public records; (3) environmental incidents that may have gone undetected or unreported prior to this assessment; (4) inaccessible areas; and/or (5) deliberate concealment of detrimental information.

Although this assessment has attempted to identify *business environmental risk*, potential *business environmental risk* may have escaped detection due to: (1) the limited scope of this assessment; (2) the inaccuracy of public records; (3) the presence of undetected or unreported environmental incidents; (4) inaccessible areas; (5) deliberate concealment of detrimental information; (6) the subjective nature of materiality to the *user* with respect to *business environmental risk*; (7) a lack of understanding of the future use of the subject property; and/or (8) the limited degree of the current state of knowledge for certain non-ASTM scope items.

Targus' professional services have been performed using that degree of care and skill ordinarily exercised, under similar conditions, by reputable environmental consultants undertaking similar studies and practicing in this locality during the same timeframe. No other warranty, express or implied, is intended or made with respect to this report or Targus' services. This assessment was not exhaustive and *users* of this report should consider the scope and limitations related to these services when developing opinions as to risks associated with the subject property. These potential risks may be more thoroughly evaluated as an additional service in an effort to further reduce, but not eliminate, uncertainty. Upon request Targus can provide options for additional research or assessment and anticipated additional cost and timing requirements.

This report presents an assessment of the subject property as defined by information provided by the Client, Client's representative, or Key Site Manager. Targus' findings, opinions, conclusions, and recommendations are based on the locations and boundaries of the subject property as evident in the field and on maps or plats provided by the Client, Client's representative, or Key Site Manager.

## 2.2.5 Special Terms and Conditions

Targus' work was conducted in general conformance with Targus' proposal No. P18-5407, dated May 1, 2018, and the terms and conditions established therein. The *user* is defined as the party seeking to use ASTM E 1527-13 to complete an ESA of the property. The *user* of this Phase I ESA is Targus' Client, Invesco, 2655 Campus POP Owner, LLC, 2755 Campus POP Owner, LLC, 2800 Campus POP Owner, LLC, 2929 Campus POP Owner, LLC, 2955 Campus POP Owner, LLC, and 2988 Campus POP Owner, LLC (collectively the Client).

There are no special terms and conditions between the *user* and Environmental Professional.

## 2.2.6 User Reliance

This report represents Targus' services as of the date hereof. As Targus' final document, it may not be altered after final issuance. This assessment and report were prepared on behalf of and for the exclusive use of Invesco solely for its use and reliance, subject to the terms and conditions agreed upon between Targus and Invesco, 2655 Campus POP Owner, LLC, 2755 Campus POP Owner, LLC, 2800 Campus POP Owner, LLC, 2929 Campus POP Owner, LLC, 2955 Campus POP Owner, LLC, and 2988 Campus POP Owner, LLC (collectively the Client). The Client and Targus were solely involved in shaping

the scope of services. Accordingly, reliance on this report by any other party may involve assumptions leading to an unintended interpretation of findings and opinions. As such, reliance by other parties on the contents of this document is not granted, and any such reliance shall be at the sole risk of the using party. With the consent of Targus and the Client and for a fee, Targus may offer reliance to third parties or contract with other parties to develop findings and opinions related to such party's specific risk management objectives. Except as otherwise agreed in writing, any and all third party reliance upon this Phase I ESA shall be subject to the terms in Targus' standard Terms and Conditions; the \$50,000 liability limitation listed in Targus' standard Terms and Conditions (available upon request) constitutes Targus' aggregate liability to any and all relying third parties for any and all claims.

### **3.0 USER-PROVIDED INFORMATION**

ASTM E 1527-13 requires that the environmental professional request from the *user* of the Phase I ESA, the Client, certain information (discussed as follows) concerning the subject property that will help identify the possibility of *recognized environmental conditions* in connection with the subject property or to request from the *user* the names of other individuals who can provide this information.

To meet the requirements of 40 CFR 312.20 and 312.25, a search for the existence of *environmental liens* and AULs that are filed or recorded against the *property* must be conducted. ASTM E 1527-13 assigns to the Client or its representative the responsibility to report to the environmental professional any environmental liens or AULs<sup>6</sup> (including institutional controls, physical or engineered controls, land use restrictions, restrictive covenants, easements, etc.) known to it. That practice does not impose on the *environmental professional* the responsibility to undertake a review of *recorded land title records* and judicial records for *environmental liens* and AULs. The *user* should either: (1) engage a title company, real estate attorney, or title professional to undertake a review of *reasonably ascertainable recorded land title records* and lien records for *environmental liens* and AULs recorded against or relating to the *property*; or (2) negotiate such an engagement of a title company, real estate attorney, or title professional as an addition to the scope of work of the *environmental professional*. The search for *environmental liens* and AULs is in addition to the *environmental professional's* search of *institutional control* and *engineering control* registries.

Depending on available information and specific site conditions, Targus may conclude that the failure of the *user* to provide environmental lien/AUL search documentation does not present a significant data gap and therefore, can declare that Targus has developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. However, failure of the *user* to provide the information or to engage the environmental consultant or others to obtain and consider that information may separately weaken a defense to liability under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

If the Client or its representative is aware of specialized knowledge or experience that is material to the identification of *recognized environmental conditions*, or if it has actual

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<sup>6</sup> See ASTM E2091 for additional information about *activity and use limitations* (AULs), their use and function, and standard means to check for existence and evaluate compliance with these controls. Targus can assist the Client with obtaining a copy on request.

knowledge that the purchase price of the subject property is significantly less than the purchase price of comparable properties, ASTM E 1527-13 assigns to the Client the obligation to communicate that information to the environmental professional prior to the subject property reconnaissance. ASTM E 1527-13 requires that an explanation of a significant decrease in purchase price be provided in writing.

ASTM E 1527-13 assigns to the Client or its representative the responsibility to inform the environmental professional of the reason it wants the Phase I ESA performed and to provide commonly known, reasonably available information about the subject property that is material to *recognized environmental conditions*. Absent information to the contrary, the purpose for assessment is assumed to be in preparation for a *commercial real estate transaction*.

As part of Targus' engagement to conduct this work, this information was requested from Invesco or its representative. In addition, Targus has requested from Invesco or its representative helpful documents such as those specified in Section 10.8 of ASTM E 1527-13 and as listed in the appendices. Finally, Targus inquired whether Invesco or its representative was aware of: (1) any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property; (2) any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or (3) any notices from governmental entities regarding possible violations of environmental laws or possible liabilities relating to hazardous substances or petroleum products.

Information known to and reported by the Client and provided at the time of authorization is discussed below in Sections 3.1 through 3.8. Information provided by others is discussed in Section 6.0. Information and excerpts from reports provided by Invesco, its representative, or others are included in the Appendices of this report and are listed in Section 9.0.

### 3.1 TITLE RECORDS

Invesco or its representative did not provide Targus with title records that documented the chain of historical ownership. However, at the request of Invesco, Targus obtained a chain-of-title from Environmental Data Resources (EDR). Available information indicated that the subject property was owned from prior to 1940 until present by various individuals, business entities, the City of San Mateo, and the San Mateo Country Club. Available information did not document prior occupants or use that indicated suspect *recognized environmental conditions*.

### 3.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS

As documented in Appendix G, Invesco reported that it was not aware of information indicative of environmental liens, AULs, or governmental notification relating to violations of environmental laws with respect to the subject property. However, at the request of Invesco, Targus obtained an environmental lien/AUL search from EDR. According to the search, no environmental liens/AULs were identified for the subject property. A copy of the environmental lien/AUL search has been included in the appendices.

### 3.3 SPECIALIZED KNOWLEDGE

As documented in Appendix G, Invesco reported that it was not aware of specialized environmental knowledge or experience indicative of *recognized environmental conditions* in connection with the subject property.

### 3.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

As documented in Appendix G, Invesco reported that the purchase price of the subject property was not significantly less than the purchase price of comparable properties.

### 3.5 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION

As documented in Appendix G, Invesco reported that it was not aware of commonly known or reasonably ascertainable information about the subject property within the local community that would be material to *recognized environmental conditions*.

### 3.6 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION

The Client requested that Targus contact Ms. Krista Dixon of Hudson Pacific Properties (Hudson), the property management firm for the subject property, to obtain information and access to the subject property. At Ms. Dixon's direction, Mr. Gary Wilson of Hudson accompanied Targus during the site walk and provided detailed information regarding operations and history. Ms. Dixon indicated that Hudson was a representative of the owner of the subject property and that she had been associated with the subject property for the past nine months. Ms. Dixon stated that she had good knowledge of the uses and physical characteristics of the subject property and was therefore considered the Key Site Manager. Information obtained from interviews with the Key Site Manager is presented in Section 6.0.

The owner was identified on the chain-of-title and environmental lien/AUL search as Hudson Peninsula Office Park, LLC.

At the time of the subject property reconnaissance, Targus noted that the subject property was occupied by an office park.

### 3.7 REASON FOR PERFORMING PHASE I

Targus understands this assessment was required prior to the proposed acquisition of an interest in the subject property. Targus understands that the purpose of this assessment was to complete an evaluation that meets the applicable standard of "all appropriate inquiries into the previous ownership and uses of the subject property consistent with good commercial or customary practice" with the objective of assembling documentation that may help to support one of the threshold criteria for satisfying one or more defenses to CERCLA liability (landowner liability protections<sup>7</sup>) and to assist the Client in understanding potential environmental conditions that could materially impact the operation of the business associated with the subject property (*business environmental risk*).

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<sup>7</sup> Landowner liability protections (LLPs) include the innocent landowner, contiguous property owner, and bona fide prospective purchaser limitations on CERCLA liability; see CERCLA (1980), SARA (1986), "Lender Liability Act" (1996), and "Brownfields Amendments" (2001).

### 3.8 OTHER

Other information that was provided is listed in Section 9.0 and is discussed throughout this report in applicable sections.

## 4.0 RECORDS REVIEW

### 4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

Targus reviewed selected federal, state, and local regulatory information in an attempt to identify recorded information concerning environmental impacts or conditions or concerns associated with the subject property. Targus reviewed the regulatory report included in the following table as obtained from Environmental Data Resources (EDR). Pertinent sections of the database report are attached in the appendices, including a listing of the databases, an explanation of each database, and figures depicting the approximate locations of regulated facilities in the near vicinity of the subject property.

Regulatory listings are limited and include only those facilities or incidents that are known to the regulatory agencies at the time of publication to be contaminated, in the process of evaluation for potential contamination, or to store/ generate potentially hazardous substances, waste, or petroleum. Those listings are compiled by the third-party information services provider engaged by Targus, who is responsible for the accuracy and completeness of its work product.

#### 4.1.1 Federal, State, and Tribal Lists

The following table includes the approximate minimum search distances and a list of the databases reviewed. These databases were selected based on minimum requirements of ASTM E 1527-13. The number of facilities indicates the number of regulated facilities identified by the database provider to be present within the approximate minimum search distance for a particular database.

ASTM FEDERAL, STATE, & TRIBAL DATABASE LISTS		
Database	Approximate Minimum Search Distance	* No. of Facilities
NPL/ Equivalents	One Mile	0
Delisted NPL	One-half Mile	0
SEMS (formerly CERCLIS)/ Equivalents (ENVIROSTOR)	One-half Mile	0
SEMS-ARCHIVE (Formerly CERC-NFRAP) Sites	One-half Mile	0
CORRACTS or Violators/ Enforcement	One Mile	0
RCRA Generators/ Equivalents (HAZNET, San Mateo Co. BI)	Subject Property and Adjoining	8
RCRA TSD Facilities	One-half Mile	0
ERNS	Subject Property	0
SHWS (Cortese, Hist Cortese, Hist Cal-Sites, HWP)	One Mile	4
SWF/LF Report (including SWRCY)	One-half Mile	0
LUST List/ Equivalents	One-half Mile	11
UST List (CA FID UST, HIST UST, SWEEPS UST)	Subject Property and Adjoining	1
VCP List	One-half Mile	0
AST	Subject Property and Adjoining	1
LIENS	Subject Property	0
Drycleaners	One-quarter Mile	3
AUL	Subject Property and Adjoining	0
Institutional Control/ Engineering Control Registries	Subject Property and Adjoining	0
Brownfields Sites	One-half Mile	0

\*If a facility was listed more than once on a particular database, it was counted as one facility for the purposes of this table.

Targus reviewed the regulatory information provided in the database report to identify listed facilities located within the approximate minimum search distances. The subject property was listed in the regulatory database report as discussed below.

Significant on-site and off-site facilities identified are included in the following table along with their distance from the subject property, the regulatory database on which the facility was listed, the apparent hydrological relationship to the subject property, information provided in the database report, Targus' observation of the facility during the area reconnaissance (if pertinent) and/or comments, and whether or not the facility was considered to be a suspect *recognized environmental condition* to the subject property.

Significant Facilities Identified Within Approximate Minimum Search Distance				
Location	Database	Database Information	Additional Information	SREC (Y/N)
<b>SUBJECT PROPERTY</b>				
Peninsula Office Park 2600-2988 Campus Drive Subject Property	HAZNET	<b>Facility and Manifest Data (HAZNET):</b> <ul style="list-style-type: none"> <li>1994 listing for polychlorinated biphenyls (PCBs) and PCB-containing waste.</li> <li>1.2 tons of waste disposed, disposal method unspecified</li> </ul>	Based on the lack of regulatory violations identified in connection with waste disposal from this facility, this listing was not considered to be a suspect <i>recognized environmental condition</i> .	N
EOP – Peninsula Office Park LLC 2655 Campus Drive Subject Property	HAZNET	<b>HAZNET:</b> <ul style="list-style-type: none"> <li>2012 listing for 0.03 tons of unspecified waste transferred off-site.</li> <li>2014 listing for 0.4 tons of asbestos-containing waste, transferred to landfill for treatment and disposal.</li> <li>2015 listing for 0.23 tons of asbestos-containing waste, transferred to landfill for treatment and disposal.</li> </ul>	Based on the lack of regulatory violations identified in connection with waste disposal from this facility, these listings were not considered to be a suspect <i>recognized environmental condition</i> .	N
EOP – Peninsula Office Park LLC/ Equity Office Inc./ Chemcrete International 2755 Campus Drive Subject Property	HAZNET, RCRA-SQG, FINDS, ECHO	<b>HAZNET:</b> <ul style="list-style-type: none"> <li>2007 listing for 0.04 tons of asbestos-containing waste transferred off-site.</li> <li>2011 listings for 0.0425 tons of organic solids waste and 0.03 tons of unspecified oil-containing waste transferred off-site.</li> <li>2014 listing for 0.8 tons of asbestos-containing waste, transferred to landfill for treatment and disposal.</li> </ul> <b>Resource Conservation and Recovery Act (RCRA)- Small Quantity Generator (SQG):</b> <ul style="list-style-type: none"> <li>Chemcrete International listed as small quantity generator.</li> <li>Date form received by agency: 10/27/1987.</li> <li>No wastes identified; no violations found.</li> </ul> <b>Facility Index System (FINDS)/ Environmental Compliance History Online (ECHO):</b> <ul style="list-style-type: none"> <li>FINDS and ECHO listings associated</li> </ul>	Targus has requested files from applicable state and local regulatory agencies regarding the RCRA-SQG status of the former tenant, Chemcrete International. As of the date of this report, applicable files have not been provided.  Based on the lack of regulatory violations identified in connection with hazardous waste disposal from this facility, these listings were not considered to be a suspect <i>recognized environmental condition</i> .	N

		<ul style="list-style-type: none"> <li>with RCRA listing.</li> <li>No violations identified.</li> </ul>		
Equity Office/ Equity Office Corp  2800 Campus Drive  Subject Property	HAZNET	<p><b>HAZNET:</b></p> <ul style="list-style-type: none"> <li>2003 listing for 0.04 tons of organic solid waste transferred off-site.</li> <li>Three 2008 listings for asbestos-containing waste included 0.4 tons transferred to landfill for treatment, 0.035 transferred off-site not for treatment, and 0.1 tons used for fuel blending prior to energy recovery off-site.</li> </ul>	<p>Based on the lack of regulatory violations identified in connection with waste disposal from this facility, these listings were not considered to be a suspect <i>recognized environmental condition</i>.</p>	N
Verizon Wireless Hwy 92 Alameda/ EOP- Peninsula Office Park LLC/ Delaward LLC  2929 Campus Drive  Subject Property	HAZNET, San Mateo Co. BI, FINDS	<p><b>HAZNET:</b></p> <ul style="list-style-type: none"> <li>2010 listing for 0.05 of organic solid waste for disposal off-site.</li> <li>2012 listing for 0.025 tons of unspecified waste for disposal off-site.</li> </ul> <p><b>San Mateo Co. Business Inventory (BI):</b></p> <ul style="list-style-type: none"> <li>Listing for hazardous material storage.</li> <li>Facility listed as active.</li> </ul> <p><b>FINDS:</b></p> <ul style="list-style-type: none"> <li>FINDS listing associated with San Mateo Co. BI listing.</li> <li>No violations noted.</li> </ul>	<p>It is likely that this San Mateo Co. BI listing is in regard to the fuel associated with the on-site generator reported to be owned by Verizon (further discussed in Section 5.0).</p> <p>Based on the lack of regulatory violations identified in connection with hazardous waste or disposal at this facility, these HAZNET and San Mateo Co. BI listings were not considered to be a suspect <i>recognized environmental condition</i>.</p>	N
EOP – Peninsula Office Park/ Equity Office Properties/ Hudson Pacific Properties LLC  2955 Campus Drive  Subject Property	EMI, FINDS, San Mateo Co. BI	<p><b>Emissions Inventory (EMI):</b></p> <ul style="list-style-type: none"> <li>Facility listed 2005-2015.</li> <li>Emissions of hydrocarbon gases, reactive organic gases, carbon monoxide, oxides of nitrogen, oxides of sulphur, and particulate matter listed.</li> <li>No violations identified.</li> </ul> <p><b>San Mateo Co. BI:</b></p> <ul style="list-style-type: none"> <li>Listing for storage of motor vehicle fuel or waste.</li> <li>Facility listed as active.</li> </ul> <p><b>FINDS:</b></p> <ul style="list-style-type: none"> <li>FINDS listings associated with San Mateo Co. BI and EMI listings.</li> <li>No violations noted.</li> </ul>	<p>With the exception of typical building systems and the on-site emergency generators (further discussed in Section 5.0), Targus did not identify on-site systems that would contribute to air emissions on the subject property.</p> <p>Targus has requested files from applicable state and local regulatory agencies regarding the on-site listing for storage of motor vehicle fuel or waste. However, as of the date of this report, applicable files have not been provided. It is likely that this San Mateo Co. BI listing is in regard to the fuel associated with the emergency generator reported to be owned and operated by the landlord of the subject property (further discussed in Section 5.0).</p> <p>Based the lack of regulatory violations identified in connection with the listings for this facility, these listings were not considered to present a suspect <i>recognized environmental condition</i>.</p>	N
Equity Office Properties/ Peninsula Office Park Associates  2988 Campus Drive  Subject Property	HAZNET	<p><b>HAZNET:</b></p> <ul style="list-style-type: none"> <li>Two 2000 listings for 0.01 tons of inorganic solid waste for 0.07 tons of organic solid waste transferred off-site.</li> <li>2009 listing for 0.1 tons of organic solid waste transferred off-site not for treatment.</li> <li>2010 listing for 0.05 tons of organic solid waste transferred off-site not for treatment.</li> <li>2011 listing for 0.11 tons of oil-containing waste transferred off-site not for treatment.</li> </ul>	<p>Targus noted that during site reconnaissance activities, materials observed were generally associated with typical building maintenance activities.</p> <p>Based on the lack of regulatory violations identified in connection with waste disposal from this facility, these listings were not considered to be a suspect <i>recognized environmental condition</i>.</p>	N

NEARBY SIGNIFICANT FACILITIES			
USPS Information Service Center  2700 Campus Drive  Adjoining NE, Generator located ~75 feet from subject property boundary  Down-gradient	UST, AST, San Mateo Co. BI	<p><b>Underground Storage Tank (UST):</b></p> <ul style="list-style-type: none"> <li>Facility ID: 4-000-024882</li> </ul> <p><b>Aboveground Storage Tank (AST):</b></p> <ul style="list-style-type: none"> <li>Facility ID: 4-000-024882CERSID: 10067434</li> </ul> <p><b>San Mateo Co. BI:</b></p> <ul style="list-style-type: none"> <li>Listing for storage of hazardous materials; underground tank with a capacity under 5,000 gallons noted.</li> <li>Facility listed as active.</li> </ul>	Based on down-gradient position relative to the subject property and lack of regulatory listings indicating a petroleum release from the UST or AST, the USPS facility was not considered to be a suspect <i>recognized environmental condition</i> to the subject property.
Holiday Cleaners  3166 Campus Drive  Located in multitenant retail strip center adjoining S, operations approximately 300 feet S.  Hydrologically separated by Beresford Creek	RCRA-SQG, Drycleaners, HAZNET, FINDS, ECHO, San Mateo Co. BI	<p><b>RCRA-SQG:</b></p> <ul style="list-style-type: none"> <li>Holiday Cleaners listed as small quantity generator, also listed as a historical large quantity generator.</li> <li>Date form received by agency 9/1/1996.</li> <li>No wastes identified.</li> </ul> <p><b>Drycleaners:</b></p> <ul style="list-style-type: none"> <li>2015 listing for dry cleaning and laundry services, facility listed as active.</li> </ul> <p><b>HAZNET:</b></p> <ul style="list-style-type: none"> <li>Years listed: 1999-2000</li> <li>Waste category: halogenated solvents (chloroforms, methyl chloride, perchloroethylene).</li> </ul> <p><b>FINDS/ECHO:</b></p> <ul style="list-style-type: none"> <li>FINDS and ECHO listings associated with RCRA listing.</li> </ul> <p><b>San Mateo Co. BI:</b></p> <ul style="list-style-type: none"> <li>One inactive listing for generating/recycling waste oil/ solvent.</li> <li>One inactive listing for storing hazardous materials.</li> <li>One active listing for generating/recycling waste oil/ solvent.</li> </ul>	Based on distance to operations, hydraulically separated position relative to the subject property, and lack of reported releases or violations, Targus does not consider this facility to be a suspect <i>recognized environmental condition</i> to the subject property.

The remaining facilities identified within their respective approximate minimum search distance included one or more LUST facilities and a dry cleaner facility. These facilities were located at least 500 feet from the subject property in topographically down- to cross-gradient positions. Based on distance and other facility-specific characteristics, these facilities are not considered to present suspect *recognized environmental conditions* to the subject property.

Several other facilities were identified on the database report. Area research did not indicate that these facilities were located within their respective approximate minimum search distances. The database report had no listed "orphan" facilities (facilities that were not mapped in the database report due to poor or inadequate address information).

EDR provides proprietary databases that may identify historical cleaners, auto stations, and manufactured gas plants that are known to EDR, typically based on city directory reviews and/or Sanborn Maps. Facilities included on this database typically operated before modern regulations requiring notification/ registration. These facilities may not be listed on regulatory databases but may be suspect *recognized environmental conditions* due to proximity to the subject property. Targus reviewed the proprietary databases, and several of these facilities were found; however, based on distance (greater than 500 feet) from the subject property, topographic gradient, and various other facility-specific characteristics, these facilities were not considered to present a suspect *recognized environmental condition* to the subject property.

#### 4.1.2 Additional Environmental Record Sources

Targus conducted the following local inquiries to enhance and supplement the ASTM E 1527-13 standard environmental record sources when, in the judgment of the environmental professional, such additional records were deemed to be reasonably ascertainable; were sufficiently useful and accurate, and complete in light of the objective of the records review; and were generally obtained pursuant to local good commercial or customary practice.

Additional Environmental Record Sources/ Local Inquiries				
Database/Source	Entity	Facility	Response Received Y/N	Pertinent Information Available Y/N
Municipal Inquiry	City of San Mateo Records Department (includes Fire Department)	Subject Property	Y	No. The City of San Mateo Fire Department forwarded records of a small fire that occurred outside at 2655 Campus Drive (POP 4) in 2017.
		2700 Campus Drive	N	N/A
		3166 Campus Drive	N	N/A
		Subject Property	N	N/A
County Inquiry	San Mateo County Environmental Health Department	2700 Campus Drive	N	N/A
		3166 Campus Drive	N	N/A
		Subject Property	N	N/A
		2700 Campus Drive	N	N/A
Regional Inquiry	Regional Water Quality Control Board	3166 Campus Drive	N	N/A
		Subject Property	N	N/A
		2700 Campus Drive	N	N/A
	Department of Toxic Substances Control	3166 Campus Drive	N	N/A
		Subject Property	N	N/A
		2700 Campus Drive	N	N/A
State Inquiry	California Environmental Protection Agency	3166 Campus Drive	N	N/A
		Subject Property	N	N/A
		2700 Campus Drive	N	N/A
		3166 Campus Drive	N	N/A

Based upon review of other regulatory information discussed above and in Section 4.1.1, findings indicating suspect *recognized environmental conditions* to the subject property were not anticipated from the local inquiries presented above.

ASTM E 1527-13 requires regulatory agency files to be obtained and reviewed if the subject or any adjoining property is identified on one or more of the standard federal, state, or tribal environmental record sources as listed in Section 8.2.1 of the ASTM standard. Regulatory files for the subject property and adjoining regulated facilities have been requested but not received to date (with the exception of the local fire department response discussed above). Based upon the types of regulatory listings and information provided by EDR, the lack of readily available regulatory files did not hinder Targus' ability to identify *recognized environmental conditions*.

## 4.2 PHYSICAL SETTING SOURCES

Physical setting sources specified in Section 9.0 of this report were reviewed to provide information about the geology and hydrogeology of the subject property.

### Surface Drainage

Based upon the topographic map reviewed, the southern portion of the subject property sloped to the south and east and the northern portion of the subject property sloped to the east and northeast toward Beresford Creek, partially located on the southwestern portion of the subject property (see the Topographic Map in the appendices). The subject property had an average surface elevation of approximately 370 feet above the National Geodetic Vertical Datum presented on the topographic map reviewed. Observation of the subject property topography corresponded with information presented on the topographic map.

### Geological Setting

The subject property is located within the Coast Range Geomorphic Province along the Santa Clara Valley. Reviewed sources indicate that the uppermost (late Quaternary) deposits are described as continental in origin and noted to consist of alluvial and fluvial materials. This recent depositional sequence lies upon a relatively older alternating series of marine and non-marine sedimentary deposits dating back to the Pliocene and Pleistocene Periods.

### Groundwater

Review of referenced sources indicated that the subject property lies within the San Mateo Plain Sub-basin of the Santa Clara Valley Groundwater Basin. The San Mateo Sub-basin occupies a structural trough, sub-parallel to the northwest trending Coast Ranges, at the southwest end of San Francisco Bay. San Francisco Bay constitutes its eastern boundary. The Santa Cruz Mountains form the western margin of the San Mateo basin. The Westside basin bounds it on the north and its southern limit is defined by San Francisquito Creek. The basin is composed of alluvial fan deposits formed by tributaries to San Francisco Bay that drain the basin. The water bearing formations of the San Mateo Sub-basin are comprised of two groups; the Santa Clara Formation of Plio-Pleistocene age and the Quaternary age alluvial deposits.

Shallow groundwater may be encountered in the vicinity of the subject property but was not known to be used as a source of drinking water. Shallow water levels will vary depending upon seasonal moisture fluctuations and local waterway levels. Based on Targus' understanding of the available information and the topography of the subject property, shallow groundwater may be expected to be present within 15 to 30 feet below ground surface (bgs).

Shallow groundwater generally flows in directions subparallel to the ground surface slopes and under the influence of gravity toward points of discharge such as creeks, swamps, drainage swales, or pumped groundwater wells. Based upon review of the topographic map, it appeared that the primary groundwater flow direction in the uppermost water-bearing unit across the subject property was radially outward from a ridge in the central portion.

According to the referenced sources, no water wells were located within one-quarter mile of the subject property.

#### 4.3 HISTORICAL USE INFORMATION ON THE SUBJECT PROPERTY

Historical sources specified in Section 9.0 of this report were reviewed to assess on-site historical activities. Targus' findings are presented in the following table. A 2017 aerial photograph of the subject property is appended to this report, as are additional aerial photographs reviewed.

<b>Table of Historical Subject Property Usage</b>			
<b>Observed Use/ Location</b>	<b>Prior Use</b>	<b>Source</b>	<b>Comments</b>
Peninsula Office Park 2655, 2755, 2800, 2929, 2955 & 2988 Campus Drive, San Mateo, California	Agricultural/ pastureland Prior to 1943 to early 1960s  Largely undeveloped/ vacant land with trails/paths Early 1960s to early- 1970s  Office park/ campus Early-1970s to present	A, CD, I, PR, T, COT, GFR	The on-site buildings were completed during the following years: 1971 (2988 Campus Drive); 1973 (2800 Campus Drive); 1974 (2655 Campus Drive); 1976 (2755 Campus Drive); 1982 (2929 Campus Drive); and 1998 (2955 Campus Drive).  Historical tenants of the subject property buildings were identified in city directories reviewed. Suspect tenants were not identified.  Several on-site facilities were identified during review of the regulatory database and are discussed in Section 4.1.1.  Additionally, see discussion of prior agricultural/pastureland usage following this table.

A - Aerial Photographs

GFR - Government File Reviews

PR - Previous Report

COT – Chain-of-Title

I – Interviews

CD - City Directory abstract<sup>8</sup>

T - Topographic Map

#### Agricultural Land Use

Review of historical information indicated that the subject property was used as pasture land from prior to 1943 to the early 1960s. On cultivated land where agricultural chemicals have been applied, it is not uncommon to find residual fertilizers, pesticides, herbicides or related compounds in the soil and groundwater. According to the aerial photographs reviewed, the prior production of grass crops did not involve intensive cultivation. Although these crops may have been treated with fertilizers and/or pesticides during their production; there were no regulatory database listings regarding agricultural activities at the time of Targus' assessment.

Review of aerial photographs (dated from 1943 to 2014) did not indicate the presence of bulk chemical storage or structures where chemicals may have been stored, herbicide/pesticide/ fertilizer loading areas, or other indications of bulk product storage or handling areas on or near the subject property. During Targus' site and area reconnaissance and review of historical information, no evidence of concentrated agricultural chemical use was identified on or near the subject property. Additionally, it has been Targus' experience that during property grading, near-surface soils are typically reworked during clearing and grading activities effectively mixing with underlying materials and attenuating concentrations of agro chemicals.

<sup>8</sup> Targus reviewed an abstract of city directories in an attempt to identify prior occupants of the subject property or adjoining parcels. The abstract was obtained from a third-party service provider Environmental Data Resources (EDR) who is responsible for the accuracy and completeness of its work product.

Based on Targus' review of available regulatory databases and aerial photographs, length of time since agricultural activities occurred, and historical mixing and grading of soil during subject property development, the potential presence of chemicals from historical agricultural activities on the subject property is considered a *de minimis* condition and not a *recognized environmental condition* to the subject property.

In addition to the historical information presented in the preceding table, an assessment as to whether or not historical uses are considered to present a suspect *recognized environmental condition* to the subject property was based on whether or not addresses for the subject property were listed on the regulatory databases reviewed (Section 4.1.1), interviews with local agency personnel (Section 4.1.2), information obtained from prior reports (Section 4.5), Targus' subject property reconnaissance observations (Section 5.0), or interviews with the Key Site Manager and/or owner's representative (Sections 5.0 and 6.0). Based on information obtained by Targus and as presented in the previously-referenced sections, historical uses of the subject property did not present suspect *recognized environmental conditions* to the subject property.

#### 4.4 HISTORICAL USE INFORMATION ON ADJOINING PROPERTIES

Nearby property usage could potentially impact the surface and subsurface conditions at a subject property. Developing a history of past uses or occupancies can provide an indication of the potential for *recognized environmental conditions* associated with the subject property. Historical information specified in Section 9.0 of this report was reviewed to assess off-site activities. Targus' findings are presented in the following table.

Table of Historical Surrounding Land Usage			
Observed Use/ Location	Prior Use	Source	Comments
<b>Northwest:</b> Single-family residences Various addresses	Agricultural/ pastureland Prior to 1943 to late 2000s  Single-family residences Late 2000s to present	A, PR, T	No suspect <i>recognized environmental conditions</i> were identified.
<b>North:</b> Peninsula Golf and Country Club  701 Madera Drive	Golf course Prior to 1943 to present	A, PR, T	Based on the down-gradient location of the golf-course and the lack of potential chemical storage buildings in close proximity to the subject property, Targus did not consider the presence of the Peninsula Golf and Country Club to present a suspect <i>recognized environmental condition</i> .
<b>Northeast:</b> United States Postal Service (USPS) Information Technology & Accounting Service Center  2700 Campus Drive	Agricultural/ pastureland Prior to 1943 to late 1970s/ early 1980s  Commercial/ office building Late 1970s/ early 1980s to present	A, CD, PR, T	Based on city directories reviewed, other former tenants of this facility included Computer Operation Services, Ixalt, Litton Industries, Inc., Systems Technology Management, Tandem Computers, Borel Restaurant Corporation, Davy McKee Corporation, and Proctor and Gamble.  The USPS facility was identified on the regulatory database and is further discussed in Section 4.1.1.

Table of Historical Surrounding Land Usage			
Observed Use/ Location	Prior Use	Source	Comments
Multitenant office building (vacant)  2600 Campus Drive	Agricultural/ pastureland Prior to 1943 to mid-1970s  Office building (currently vacant) Mid-1970s to present	A, CD, PR, T	<p>Based on city directories reviewed, former tenants of this facility included, but were not limited to: Radiomail Corp., University Pronet Inc., Blue Martini Software Inc., Conference Planners LLC, Factset Research Systems Inc., Gemini Mobile Technologies, Laszlo Systems, Inc., Prometheus Development Co. Inc., Seagram Enterprises Inc., Taviz Technology Inc., and Trident Construction Inc.</p> <p>Based on the lack of regulatory listings for this facility, its down-gradient location relative to the subject property, and the former use of this facility as an office building, Targus does not consider the former tenants to present a suspect recognized environmental condition.</p>
<b>East:</b> Vacant wooded land and Beresford Creek	Vacant wooded land and Beresford Creek Prior to 1943 to present	A, PR, T	Beresford Creek is discussed further in Section 8.2.5.
<b>South:</b> Vacant wooded land and Beresford Creek	Vacant wooded land and Beresford Creek Prior to 1943 to present	A, PR, T	Beresford Creek is discussed further in Section 8.2.5.
Oak View Apartments  3135 Campus Drive	Agricultural/ pastureland/ vacant wooded land Prior to 1943 to late 1940s-early 1960s  Agricultural complex Late 1940s-early 1960s  Vacant land Late 1940s-early 1960s to late 1960s/ early 1970s  Multifamily residential complex Late 1960s/ early 1970s to present	A, CD, PR, T	<p>The agricultural complex (several buildings and associated row crops) was located down-gradient from the subject property, across Beresford Creek.</p> <p>No suspect recognized environmental conditions were identified.</p>
(across Campus Drive) Multitenant Retail Strip Center  3150-3182 Campus Drive	Agricultural/ pastureland Prior to 1943 to late 1940s-early 1960s  Agricultural complex Late 1940s-early 1960s  Vacant land Late 1940s-early 1960s to late 1970s/ early 1980s  Retail Strip Center Late 1970s/ early 1980s to present	A, CD, PR, T	<p>Tenants of the retail strip center at the time of Targus' subject property reconnaissance included Bank of America, the UPS store, various restaurants, and a drycleaner (Holiday Cleaners).</p> <p>Based on city directories reviewed, former tenants of this property included, but were not limited to, travel agent offices, insurance businesses, banks, accountants, financial institutions, a nail salon, a photography studio, and a tailor.</p> <p>Holiday Cleaners was identified during regulatory review and is further discussed in Section 4.1.1.</p>
<b>West (across Campus Drive and Live Oak Drive):</b> Vacant land	Agricultural/ pastureland/ vacant land Prior to 1943 to present	A, PR, T	No suspect recognized environmental conditions were identified.

Table of Historical Surrounding Land Usage			
Observed Use/ Location	Prior Use	Source	Comments
<b>Central:</b> Multitenant office building 2855 Campus Drive	Agricultural/ pastureland Prior to 1943 to late 1960s/ early 1970s  Office building Late 1960s/ early 1970s to present	A, CD, PR, T	Based on city directories reviewed, historical tenants of the office building included Synergenix, Sandpiper Limited, Acorn Inc., and Electronics for Imaging Inc. Current tenants include Konica Minolta (digital x-ray company), Menlo Logistics (supply chain company), and Con-Way Inc. (freight transportation and logistics company).  Based on the lack of regulatory listings for this facility and its use as an office building, Targus does not consider this facility to present a suspect <i>recognized environmental condition</i> to the subject property.

A - Aerial Photographs  
T - Topographic Map

CD - City Directories

PR - Previous Report

An assessment as to whether or not historical adjoining land use was considered to present a suspect *recognized environmental condition* to the subject property was based on whether or not the property or occupants were listed on the regulatory databases reviewed (Section 4.1.1), information obtained from prior reports (Section 4.5), Targus' area reconnaissance observations (Section 2.1.4), and interviews with the site contact and/or owner's representative (Sections 5.0 and 6.0). Based on information obtained by Targus and as presented in the previously-referenced sections, prior historical surrounding land usage was not considered a suspect *recognized environmental condition* to the subject property.

#### 4.5 REVIEW OF PREVIOUS REPORTS

Targus reviewed a prior report provided by the Client as summarized in the following table.

Consultant, Report Title, Date	Pertinent Information	Conclusions
<p>IVI Assessment Services, Inc. (IVI)  Phase I Environmental Site Assessment – Peninsula Office Park, 2600, 2655, 2755, 2800, 2929, 2955 &amp; 2988 Campus Drive, San Mateo, California 94403  March 3, 2014</p>	<p>The property assessed by IVI included the subject property assessed by Targus and the adjoining east office building at 2600 Campus Drive.</p> <p>At the time of IVI's assessment, the site was improved with an office park with seven office buildings and a parking garage. During site reconnaissance activities, IVI observed small containers of cleaning chemicals in various maintenance areas, an emergency generator with an associated diesel AST, and multiple hydraulic elevators. IVI did not observe evidence of chemical or hazardous materials spills on the site.</p> <p>IVI identified several regulated facilities including a LUST sites, a RCRA facility, and HAZNET listings. Based on facility specific characteristics, IVI did not consider these facilities to present a <i>recognized environmental condition</i> to the subject property.</p> <p>IVI's historical review did not indicate <i>recognized environmental conditions</i> to the subject property.</p> <p>IVI reasoned that based on the age of the on-site improvements, there was a potential presence of asbestos-containing materials (ACM). IVI observed signs near the roof access of the buildings identifying the presence of non-friable asbestos in roof penetration sealant, as well as signs in several of the basements identifying the presence of non-friable asbestos in the firebrick insulation. IVI noted that the assessed property had an existing Asbestos O&amp;M program in place and that asbestos abatement had historically occurred during tenant suite renovation. IVI noted that confirmed and suspect ACM observed appeared to be in good condition.</p>	<p>IVI concluded that their assessment did not reveal evidence of <i>recognized environmental conditions</i> in connection with the assessed property.</p>

## 5.0 SUBJECT PROPERTY RECONNAISSANCE

### 5.1 METHODOLOGY AND LIMITING CONDITIONS

Targus visually and physically observed accessible areas of the subject property. The periphery of the subject property was visually and/or physically observed, as well as the periphery of structures on the subject property. The subject property was viewed from adjacent public thoroughfares. In the interiors of structures, Targus observed accessible common areas expected to be used by occupants or the public, as well as maintenance and repair areas. Targus also observed a representative sample of tenant spaces.

Limitations imposed by physical obstructions or other limiting conditions included:

- Targus did not have access to the elevator pits during the site reconnaissance. However, Targus was able to obtain recent photographs of the elevator pits as discussed below.

### 5.2 GENERAL SUBJECT PROPERTY SETTING

The subject property reconnaissance was performed by Mr. Tommy Kim, a professional experienced in environmental site assessments, in an attempt to identify apparent visual indications of present or past activities that have or could have contaminated the subject property. Targus was accompanied during the subject property reconnaissance by the Chief

Engineer, Mr. Gary Wilson. Mr. Wilson had been familiar with the subject property for approximately 40 years. A Site Plan has been included in the appendices.

The observed use of the subject property was discussed in Section 2.1.2. A description of structures, roads, and other improvements on the subject property, if any, was presented in Section 2.1.3.

General Subject Property Observations		
Description	Reported or Observed On-site (Y/N)	Comments (Observations considered to be SRECs are further discussed after the table.)
Hazardous Substances and Petroleum Products in Connection with Identified Uses	Y	Limited quantities of paints, maintenance fluids (including hydraulic oil), cleaning supplies, and water treatment chemicals were noted in flammables closets or designated areas on-site including the maintenance office, janitorial rooms and equipment areas. The chemicals were in closed containers without apparent leakage or spills.
Storage Tanks	Y	Two emergency back-up generators, with reported secondary containment, were located on the subject property (specifically, northwest-adjacent to POP 8 and southwest-adjacent to POP 9). The POP 8 generator was reported to be owned by Verizon and was equipped with an approximately 100-gallon sub-base tank containing diesel. The POP 9 generator was reported to be owned by the landlord for life/ safety emergency use purposes, and was equipped with an approximately 130-gallon sub-base tank containing diesel. No evidence of oil leaks or spills was observed in the vicinity of the generators during the subject property reconnaissance. Mr. Wilson was not aware of incidents where fuel leaked from the equipment. An active permit for the POP 9 generator was provided by the client and is located in Appendix G.  One underground grease trap was located in POP 9 for the on-site restaurant. The grease trap was reportedly serviced by Pioneer every two to three months.
Strong, Pungent, or Noxious Odors	N	
Pools of Liquid	N	
Drums	N	
Hazardous Substances and Petroleum Products Containers Not in Connection with Identified Uses	N	
Unidentified Substance Containers	N	
Potential Polychlorinated Biphenyls (PCB)-Containing Hydraulic or Electrical Equipment	Y	Six pad-mounted electrical transformers were observed on the subject property. The transformers were in undamaged physical condition and displayed no visible evidence of leakage. PG&E was the likely owning utility and typically would be responsible for leaks or spills associated with its equipment. Labeling regarding PCB content was not evident on the equipment with the exception of the transformer at POP 1. The label on the POP 1 transformer indicated the equipment was filled with Envirotemp FR3 fluid, a dielectric coolant that is derived from renewable vegetable oils.
Hydraulic Equipment	Y	POP 1 was improved with one traction elevator. The remaining buildings were improved with a total of 10 hydraulic elevators.

		With regards to the hydraulic systems, Mr. Wilson was not aware of incidents related to equipment malfunction or fluid loss. The elevators reportedly functioned properly and were serviced by Ameritex Elevator Service. As noted above, Targus did not have access to the elevator pits. No evidence of staining or leaks was observed in the elevator equipment rooms. The elevator systems are discussed below.
Contracted Maintenance Services	Y	Lawn care and pest control activities were reported by the site representative to be conducted by contracted maintenance services. No chemicals typically associated with lawn care or pest control activities were observed by Targus during the site reconnaissance or reported to be present on site by the Key Site Manager.
Utilities and Stormwater Management	Y	Natural gas and electricity were supplied to the subject property by PG&E. California Water Services and San Mateo County provided water and wastewater services to the subject property, respectively.  Surface water runoff from the subject property was expected to drain into various storm drain inlets located throughout the parking lot of the subject property. Stormwater from surrounding properties was not expected to drain onto the subject property.
Other	N	

### Hydraulic Elevators

A total of ten hydraulic elevators that provided access to the top floors of each building (with the exception of POP 1) were observed on the subject property. Property management stated that the elevators seemed to function properly and had not been repaired for fluid loss or removed from service in the previous five years. According to property management, the elevators were maintained by AmeriTEx Elevator Service (AmeriTEx) under a service agreement. Mr. Wilson of Hudson provided access to the reservoir/pump rooms; Targus observed that the reservoir/pump equipment for the hydraulic elevators appeared to be in good condition. The elevator pit areas were inaccessible during the time of the site reconnaissance. At the suggestion of Mr. Hudson, Targus contacted Mr. John Sellen of JESellen Consulting, who performed an assessment of the elevators on May 8, 2018 (two days prior to Targus' assessment) and provided photographs of the elevator pits for Targus. From the photographs provided, limited oil stains were observed in the area of the side rails and no indications of leaking piston seals were observed on the elevator pit floors in the vicinity of the hydraulic pistons.

Targus contacted AmeriTEx for additional information regarding construction details and maintenance schedule. Targus interviewed Mr. Chris Aissa of AmeriTEx, who stated that the elevators were installed according to the information provided in the following table and that to his knowledge they had not experienced leaks associated with the piston seals. Mr. Aissa confirmed that the construction of the subsurface jack cylinders included a polyvinyl chloride (PVC) sleeve with double-capped bottoms. Mr. Aissa was not aware of leaks or releases of hydraulic fluid from the elevator systems. Mr. Aissa indicated that the elevator jack assemblies were non-telescoping; therefore, the components extended approximately two to four stories below ground. In addition, Mr. Aissa confirmed that AmeriTEx performs monthly regular service of the ten hydraulic elevators at the subject property. Installation information provided by Mr. Aissa is as follows:

Building Number/ Address	Number of Hydraulic Elevators	Elevator ID	Year Installed	Installation Company
POP 3: 2800 Campus Drive	1	057858	1974	Westinghouse
POP 4: 2655 Campus Drive	1	059461	1974	Otis
POP 5: 2755 Campus Drive	2	063535	1977	Westinghouse
		063536	1978	Westinghouse
POP 8: 2929 Campus Drive	2	068538	1981	Westinghouse
		068539	1981	Westinghouse
POP 9: 2955 Campus Drive	4	111263	1998	Schindler
		111265	1998	Schindler
		111381	1998	Schindler
		111389	1998	Schindler

Based on the information provided concerning the construction of the on-site elevator systems and that neither property management nor the elevator maintenance company was aware of significant releases of hydraulic fluid, the hydraulic elevators on the subject property are not considered to be a *recognized environmental condition*.

Exterior Observations		
Description	Reported or Observed On-site (Y/N)	Comments (Observations considered to be SRECs are further discussed after the table.)
Pits, Ponds, Lagoons, and Surface Waters	Y	Beresford Creek was identified at the southwestern portion of the subject property. Beresford Creek is further discussed in Section 8.2.5.
Stained Soil or Pavement	Y	Typical parking lot staining, associated with automobile crankcase leakage, was observed.
Stressed Vegetation	N	
Solid Waste	Y	Solid waste dumpsters were observed in the parking lots. According to the site representative, an off-site contractor serviced these dumpsters on a regular basis.
Process/ Industrial Wastewater Discharges	Y	The local municipality has provided sanitary disposal services to the subject property since its first developed use. No process or industrial wastewater discharges were identified.
Wells	N	
Septic Systems	N	

Interior Observations		
Description	Reported or Observed On-site (Y/N)	Comments (Observations considered to be SRECs are further discussed after the table.)
Heating/ Cooling	Y	The on-site buildings are improved with natural gas heat via boilers/ furnaces. POP 9 was equipped with a cooling tower. The remaining buildings were equipped with evaporation condenser units for their cooling systems. There are no heating oil tanks on-site.
Stains or Corrosion	N	

Interior Observations		
Description	Reported or Observed On-site (Y/N)	Comments (Observations considered to be SRECs are further discussed after the table.)
Drains and Sumps	Y	<p>Sumps or drains were observed in the janitorial closets, mechanical areas, and restrooms, and stormwater drains in the parking lot. Targus did not observe stains; strong, pungent, or noxious odors; or evidence of improper disposal of material associated with these drains.</p> <p>Sump pumps were observed in POP 3, 4, 5, and 8. The sump pumps were designed to collect surface and condensation water from cooling equipment. According to Mr. Wilson, the sump pumps do not collect groundwater. There have not been issues or concerns related to groundwater intrusion. The sump pumps discharge to the sanitary sewer. Unusual odor or staining was not observed near the sump pumps.</p>

## 6.0 INTERVIEWS

ASTM E 1527-13 requires that a reasonable attempt be made to interview past and present owners, operators, and occupants who are likely to have material information about uses and conditions that could present a suspect *recognized environmental condition* to the subject property. ASTM E 1527-13 requires that the owner or its representative be asked to identify a person with good knowledge of the uses and physical characteristics of the subject property who is defined as the Key Site Manager. The interviews were conducted in person, by telephone, or in writing and are discussed in the following table.

Name/ Company	Title/ Position	Comments
Hudson Peninsula Office Park, LLC	Owner	The owner of the subject property was not available.
Ms. Krista M. Dixon, Hudson Pacific Properties	Key Site Manager	Targus interviewed the Key Site Manager. Information provided is included in relevant sections of this report. No information regarding environmental liens or AULs was reported to Targus during this interview. The Key Site Manager was not aware of: (1) any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property; (2) any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or (3) any notices from governmental entities regarding possible violations of environmental laws or possible liabilities relating to hazardous substances or petroleum products. Targus also requested whether the Key Site Manager could provide helpful documents such as those specified in Section 10.8 of ASTM E 1527-13 and as listed in the appendices. Documents provided by the Key Site Manager are listed in Section 9.0.
Mr. Gary Wilson, Hudson Pacific Properties	Chief Engineer	Mr. Wilson accompanied Targus on the subject property reconnaissance. Information provided by Mr. Wilson is included in pertinent sections of this report.
Mr. Chris Aissa, AmeriTex Elevator Service	Account Manager	Targus interviewed Mr. Aissa regarding details of construction and the maintenance schedule for the on-site elevators. This information is discussed in Section 5.2.

Name/ Company	Title/ Position	Comments
	Individuals interviewed for prior ESAs	Targus reviewed prior reports that contained documentation of interviews with individuals familiar with the subject property. In accordance with ASTM E 1527-13, these individuals were not questioned concerning information already discussed. Information obtained from the prior interviews is presented in Section 4.5.
	Local Gov. Officials	Information obtained from interviews and contact with local governmental officials is discussed in pertinent sections of this report.

Records of communication for the interviews conducted are provided in the appendices.

## 7.0 EVALUATION

This section documents the findings, opinions and conclusions of the Phase I Environmental Site Assessment.

### 7.1 FINDINGS AND OPINION

Based on the information obtained by Targus to date, the following summarizes Targus' findings and opinion regarding the known or suspect *recognized environmental conditions* identified and the environmental professional's rationale for concluding that a condition is currently a *recognized environmental condition*, a *controlled recognized environmental condition*, a *historical recognized environmental condition*, *de minimis* condition, or not a *recognized environmental condition*.

Description (Address)	Distance & Direction	Report Section	Opinion
Hydraulic elevators	On-Site	5.2	Based on the information provided concerning the elevator construction and considering that neither property management nor the elevator maintenance company were aware of significant releases of hydraulic fluid, the elevators on the subject property are not considered to be a <i>recognized environmental condition</i> .
Historical agricultural/pastureland usage	On-site	4.3	Based on Targus' review of available regulatory databases and aerial photographs, length of time since agricultural activities occurred, and historical mixing and grading of soil during subject property development, the potential presence of chemicals from historical agricultural activities on the subject property are considered a <i>de minimis</i> condition and not a <i>recognized environmental condition</i> to the subject property.

### 7.2 CONCLUSIONS

Targus has performed a Phase I Environmental Site Assessment of the Peninsula Office Park, located at 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive in San Mateo, San Mateo County, California in general conformance with the scope and limitations of ASTM Practice E 1527-13. Exceptions to, or deletions from, this practice are described in Section 7.3 of this report.

Based upon the information obtained, as reflected in this report, this assessment has revealed no evidence of *recognized environmental conditions* in connection with the subject property.

### 7.3 DATA GAPS AND DELETIONS

Data gaps are defined as a lack of or inability to obtain information required by ASTM E 1527-13 despite good faith efforts. Data gaps identified are discussed below and were not considered to be significant data gaps that affected the ability of the environmental professional to identify *recognized environmental conditions*. Known deviations or deletions from the scope of work defined by ASTM E 1527-13 were not intentionally made.

- Certain regulatory agency files requested from various local, regional or state agencies for the subject or adjoining properties had not been received as of the issuance of this report. File review as required by ASTM E 1527-13 was not conducted because the files were not made available prior to the issuance of the report. In light of the collective information received and as reviewed/ discussed in this report, Targus does not consider these files omitted from review to present a significant data gap.

The listed standard historical sources were not reviewed. It is Targus' opinion that these sources would not provide additional meaningful and complete information, or the sources were not considered to be practically reviewable or reasonably ascertainable.

- Building department records; and
- Zoning/ land use records.

### 7.4 SIGNATURES AND QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL(S)

I declare that, to the best of my professional knowledge and belief, I meet the definition of an environmental professional as defined in Section 312.10 of 40 CFR 312, and I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Samuel W. Johnson  
Environmental Professional

In accordance with ASTM E 1527-13, this report includes the qualifications of the environmental professional, and the qualifications of the personnel conducting the site reconnaissance and interviews, if conducted by someone other than an environmental professional. These qualifications are documented in the appendices. A Statement of Qualifications for the company has not been included with this report but can be provided upon request.

## 8.0 Non-ASTM SERVICES

### 8.1 FINDINGS

In accordance with the proposed scope of work, Targus conducted additional services as discussed in Section 8.0 of this report. Based on Targus' understanding of the Client's risk tolerance and future plans for the subject property, this assessment/ review did not identify *business environmental risk* associated with the additional services performed; however, this conclusion is specifically conditional on proper future management of suspect and confirmed asbestos-containing materials (ACM) in accordance with applicable regulations.

Targus understands that confirmed and suspect ACM will be managed in accordance with Invesco's asbestos policy.

### 8.2 INDIVIDUAL SERVICES

#### 8.2.1 Asbestos

A visual asbestos survey of the subject property was performed on May 10, 2018 by Mr. Tommy Kim, an EPA-certified asbestos inspector experienced in regulations and procedures governing asbestos. This survey consisted of a walk-through of limited building areas, and observation of suspect ACM. On-site personnel provided access to the areas observed by Targus.

Asbestos O&M programs were provided for the POP 1 (2988 Campus Drive), POP 3 (2800 Campus Drive), POP 4 (2655 Campus Drive), POP 5 (2755 Campus Drive), and POP 8 (2929 Campus Drive). An asbestos O&M program was not provided for POP 9 (2955), the most recently constructed building (1998). The provided O&M programs are from 2004 and do not contain site-specific asbestos information.

Several limited surveys and abatement reports were provided for the subject property buildings. Three limited inspection reports and one abatement report (Suite 100) were provided for the POP 1 building. The third floor of the POP 1 building was surveyed, asbestos in flooring was identified, and the asbestos-containing flooring was abated in 2016.

The first floor lobby area and Suite 150 in the POP 3 building were surveyed in 2016. No ACMs were identified in the lobby, however ACMs in the form of mastics and glue underneath floor tile and carpet were identified in Suite 150; these were abated in 2016.

The second floor corridor and Suites 100 A, B, and C, Suite 250, and restrooms in the POP 4 building were surveyed in 2017 and 2018. Asbestos was identified in Suite 250 in joint compound, white compound, and mastics; these materials were abated in 2017. ACMs were not detected in the second floor corridor or Suites 100 A, B, and C.

The roof and Suites 130, 200, 210, 300, and 350 in the POP 5 building were surveyed in 2017. Asbestos in black mastic (under vinyl floor tile) was identified in Suites 300 and 350. Additionally, asbestos was identified in roofing materials, including parapet wall flashing and mastics. No ACMs were identified in Suites 130, 200, and 210. No abatement reports were provided for the POP 5 building.

Suites 101, 150, 400, 410, the third and fourth floors of the building, first floor restrooms, and exterior façade of the POP 8 building were surveyed for ACMs in 2015, 2016, and 2017. Asbestos was identified in carpet mastic in Suite 150, in black mastic (under vinyl floor tile) in Suite 410, and in sink undercoat in Suite 410. No ACMs were identified in Suites 101, 200, or 400, in the first floor restrooms, on the third and fourth floors, or on the exterior façade of the building. The asbestos-containing sink undercoat in Suite 410 was abated in 2016. No other abatement records were provided for the POP 8 building.

In the POP 9 building, NetSuite (located on the second floor) and a portion of the first floor corridor were surveyed in 2013 and 2014. Asbestos was not identified in the sampled materials.

The visual asbestos survey scope of work was intended to identify the potential presence of major classes of accessible suspect ACM at the subject property and addresses very limited objectives relating to the characterization of asbestos within the project. Estimation and determination of exact quantities and locations of these materials at the subject property was beyond the scope of this survey. These data alone are not appropriate for planning specific response actions or for health hazard assessment, nor are they sufficient for renovation or demolition activities. In the event renovation or demolition activities are planned, a comprehensive asbestos survey would be required prior to initiation of such activities.

The subject property consisted of an office park. Improvements included six office buildings, a parking garage, concrete and asphalt parking lots, and limited landscaped areas. According to property management, the subject property improvements were not originally constructed in a single phase; therefore, suspect ACM of like appearance was not assumed by Targus to be homogenous. In addition, renovations and individual tenant finish-outs appear to have occurred since original construction. Suspect ACM observed included various wall and ceiling systems (including wallboard, joint compound, and texture), floor tile, mastics, caulking, pipe insulation, boiler insulation, spray-applied fire proofing, and ceiling tiles. On the exterior of the improvements Targus observed suspect ACM including roofing materials, window caulk, and stucco plaster. The suspect ACM was observed by Targus to be in good condition and non-friable. Of note, during site reconnaissance activities, Targus observed signage in multiple buildings indicating potentially hazardous/ACM exposure areas. Signage was observed in POP 1 and POP 8. Signs were observed near the roof access of the buildings identifying the presence of non-friable asbestos in roof penetration sealant, as well as signs in the basements identifying the presence of non-friable asbestos in the firebrick insulation.

Additionally, as mentioned in Section 4.1.1, Targus noted regulatory HAZNET listings for asbestos disposal activities at the subject property. These listings indicate that asbestos abatement has taken place at the subject property, likely in relation to routine maintenance and tenant improvements. No asbestos inventory or additional information about the abatement activities was provided by the key site manager or in the regulatory database report or regulatory files reviewed by Targus.

Although testing was not conducted, in buildings of similar age and type of construction the presence of large quantities of asbestos in major suspect materials is uncommon. Notwithstanding date of construction or likelihood of asbestos, the National Emission Standard for Hazardous Air Pollutants (NESHAP) regulations consider certain building materials that have not been thoroughly tested to be suspect ACM regardless. Such

materials number in excess of 30,000 products, but those commonly encountered in modern building systems include flooring materials, mastics, sealants, finish textures, ceiling tiles, non-fiberglass thermal and other insulation, roofing components, and fireproofing.

Revisions to regulations issued by Occupational Safety and Health Administration (OSHA) require that all thermal system insulation, surfacing materials, and resilient flooring materials installed prior to 1981 be considered Presumed Asbestos-Containing Materials (PACM) and treated accordingly. In order to rebut the designation as PACM, OSHA requires that these materials be surveyed, sampled, and assessed in accordance with the Asbestos Hazard Emergency Response Act of 1986 (AHERA). The visual asbestos survey scope of services was not intended to be sufficient to rebut the PACM designation. Thus, these suspect materials not documented to have been installed after 1981 must be managed as asbestos pending a negative demonstration.

Based on the good condition of the suspect and confirmed ACM identified, asbestos is not considered to be a *business environmental risk* to the subject property. However, the asbestos survey was not comprehensive and should not be relied upon in preparation of renovation or demolition projects. Prior to demolition/ renovation activities or other activities that could potentially disturb suspect ACM, additional sampling and analysis of the materials using protocols specified in AHERA (40 CFR 763) should be performed. Alternatively, the material can be assumed to contain asbestos and treated accordingly. Future activities that involve the disturbance or removal of confirmed or suspect ACM are required to be conducted in accordance with NESHAP and other applicable local, state, and federal regulations.

#### 8.2.2 Radon

Radon ( $Rn^{222}$ ) is a naturally occurring inert, colorless, odorless radioactive gas derived from the decay of radium ( $Ra^{226}$ ). Radium occurs in geological formations containing uranium, granite, shale, phosphate, or pitchblende and was commercially used in luminescent products. Radium decays into reactive, radioactive daughter particles that attach themselves to other particles such as dust and are a lung cancer risk. Radon can move through permeable rocks and soils and can eventually seep into buildings. The movement of radon into buildings is controlled largely by the soil permeability under a foundation and access to the interior of buildings through openings in the foundation.

According to the *EDR-Radius Map with GeoCheck* and the California radon report for zip code 94403 of San Mateo County, Peninsula Office Park was located in EPA Radon Zone 2 (average indoor level between 2 and 4 picoCuries per liter [ $pCi/L$ ]).

Based upon published information and non-residential occupancy, radon does not appear to present a *business environmental risk* to the subject property.

#### 8.2.3 Lead-Based Paint

Some of the on-site improvements were originally constructed prior to 1979 and may contain lead-based paint despite subsequent renovation. During the subject property reconnaissance, Targus noted that building materials and painted surfaces were in good condition. No evidence of significantly damaged or peeling paint was noted.

#### 8.2.4 Lead-in-Drinking Water

Drinking water for the subject property was supplied by the City of San Mateo. Targus reviewed the consumer confidence water system report for water distributed by this system. Data published in 2016 did not identify health-based violations associated with lead-in-drinking water supplied by this system. Based on non-residential occupancy and information provided from the consumer confidence water system report, no lead-in-drinking water testing was conducted.

#### 8.2.5 Wetlands

Beresford Creek was located along the southern portion of the subject property. This creek was depicted on historical topographic maps and aerial photographs reviewed. Review of the United States Fish and Wildlife Service (USFWS) National Wetlands Inventory (NWI) Map indicated that the creek was identified as a potential wetlands area, designated as a “riverine.” Future construction or disturbance in this area may require permitting and special considerations under the guidance of the United States Army Corps of Engineers (USACE) and/or other applicable regulatory agencies.

#### 8.2.6 Endangered Species

Based on information reviewed on the USFWS Information for Planning and Conservation (IPaC) website, endangered species for Wake County, and their listing status' are identified as follows.

Common Name	Scientific Name	Type
Salt Marsh Harvest Mouse	<i>Reithrodontomys raviventris</i>	Mammal
California Clapper Rail	<i>Rallus longirostris obsoletus</i>	Bird
California Least Tern	<i>Sterna antillarum browni</i>	Bird
San Francisco Garter Snake	<i>Thamnophis sirtalis tetrataenia</i>	Reptile
Mission Blue Butterfly	<i>Icaricia icarioides missionensis</i>	Insect
Myrtle's Silverspot Butterfly	<i>Speyeria zerene myrtleae</i>	Insect
San Bruno Elfin Butterfly	<i>Callophrys mossii bayensis</i>	Insect
Fountain Thistle	<i>Cirsium fontinale var. fontinale</i>	Flowering Plant
San Mateo Thormint	<i>Acanthomintha obovata ssp. duttonii</i>	Flowering Plant
San Mateo Woolly Sunflower	<i>Eriophyllum latilobum</i>	Flowering Plant
White-rayed Pentachaeta	<i>Pentachaeta bellidiflora</i>	Flowering Plant

As part of this assessment, Targus' endangered species review included the following:

- On-site observations for listed species and/or their critical habitat as documented on the USFWS website;
- The utilization of the USFWS IPaC application; and
- A comparison of critical habitat and territory information to conditions observed on the subject property.

Based on the list of endangered species identified within San Mateo County, local observations, habitat comparisons, development within the immediate site vicinity, and absence of critical habitat on the subject property (according to the IPaC application), the potential for endangered species to be present at the subject property on a non-transient basis is considered to be low. However, due to the location of Beresford Creek and

associated vegetation on the undeveloped southwestern portion of the subject property, if the southwestern portion of the subject property is planned for future development, further evaluation may be required.

#### 8.2.7 Mold/ Moisture

A limited survey for moisture intrusion, visible fungal growth, and physical deficiencies conducive to mold (i.e., “*mold survey*”) of the subject property was performed by Targus’ field observer Mr. Kim on May 10, 2018. The objective of this *mold survey* was to observe and report on the apparent presence of, or potential for, moisture intrusion and visible fungal growth in readily accessible representative areas of the subject property to the extent feasible within the process described in Targus’ authorized scope. The rationale for and approach to this assessment draws heavily from that laid out in the ASTM Standard Guide for Readily Observable Mold and Conditions Conducive to Mold in Commercial Buildings: Baseline Survey Process (Designation: E 2418-06), but may deviate from that practice in light of our understanding of the Client’s objectives and risk tolerance. As defined by the authorized scope, the degree of thoroughness of this *mold survey* was intended to represent a commercially prudent and reasonable inquiry that balanced the competing goals of limiting time and cost with the reduction of uncertainty about unknown conditions. This *mold survey* was not intended to be comprehensive in all or most building systems and was not intended to eliminate the risk of moisture intrusion or fungal growth. No limited survey can wholly eliminate uncertainty regarding the potential for moisture intrusion or fungal growth.

Property management and maintenance personnel were interviewed in an attempt to gain information indicative of moisture intrusion or fungal growth. Targus was informed by Ms. Dixon that she had not received complaints of mold growth.

Targus’ field observer walked the outside perimeter of the six office buildings and the parking garage building at the subject property to make exterior visual observations. Areas observed included the ground surface, exterior walls, roofs, visible portions of roof areas from the ground, cooling towers, and air intakes. Additional exterior areas may have also been observed as judged by the field observer to merit inclusion. The individual structures were selected based on information gained from the interviews, document review, topographical information and proximity and configuration of stormwater drainage features and areas of accumulation.

Targus’ field observer made visual observations of the interiors of the subject property improvements. Those observations included readily-accessible common (doorways, combustion system exhaust vents), maintenance/ repair, mechanical, and support areas; other assessable areas included basements. Additionally, the interior of several individual tenant spaces were included in the field observations. In general, interior areas selected for observation included cabinets under breakroom sinks and toilet room vanities, along window frames and perimeter walls and wall penetrations, HVAC closets and equipment, and ceilings beneath cooling equipment. These named areas were included as locations where moisture infiltration and fungal growth commonly occur and can often be evident from visual observations. Additional interior areas may have also been observed as judged by the field observer to merit inclusion. Targus’ observations were augmented by measuring the moisture content in building materials and by temperature and humidity readings. No indicators of interior excessive moisture, water-affected building materials, visible fungal growth, or other conditions were observed.

Provided that future maintenance includes timely and pro-active identification of moisture intrusion, vigorous response to fungal growth and tenant complaints, cleaning, repair, or replacement of affected building material in accordance with an accepted standard industry practice, mold growth at the subject property is not considered to constitute a *business environmental risk*.

#### 8.2.8 Oil and Gas Activity

Based on the subject property and area reconnaissance, and review of the topographic map, aerial photographs, and the National Pipeline Mapping System and California Division of Oil, Gas & Geothermal Resources (DOGGR) online databases, no activities or conditions were observed that would indicate the presence of exploration, production, or distribution of oil and gas on or in the immediate vicinity of the subject property.

#### 8.2.9 Flood Plain

Based on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Map Number 06081C0162F, dated July 16, 2015, the subject property was in an unshaded area. The unshaded areas were designated as either: (1) areas determined to be outside the 0.2% annual chance floodplain; or (2) areas in which flood hazards are undetermined, but possible.

#### 8.2.10 Right-to-Know Requirements

The *Emergency Planning and Community Right-to-Know Act* (EPCRA) establishes what are commonly known as “Right-to-Know Requirements” concerning environmental and safety hazards posed by the storage and handling of toxic chemicals. Targus did not identify the subject property occupants to possess chemical inventories in sufficient quantities or be engaged in business operations to which these federal “right-to-know” requirements apply.

#### 8.2.11 Limited Vapor Encroachment Screening

In accordance with the proposed scope of work, Targus conducted a Limited Vapor Encroachment Screening (limited VES) at the *target property* (herein referred to as the “subject property”). The American Society for Testing Materials (ASTM) has published a *Standard Guide for Vapor Encroachment Screening*<sup>9</sup> that is implemented by some for evaluating potential *business environmental risk* associated with volatile compounds in the subsurface. The practices laid out in the guide<sup>10</sup> provide useful information for evaluation of the potential condition using terminology that is clearly defined and widely recognized. Additionally, the guide presents assessment approaches that are beyond the scope of this section of Targus’ report. In accordance with Targus’ engagement, the scope of this project is limited, and although this assessment draws upon the concepts laid out in ASTM E 2600-10 and uses the terminology defined therein, in the interest of efficiency and economy, this section represents services that differed from an ASTM Tier 1 VES. Moreover, the

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<sup>9</sup> *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*. Designation E2600-10. Note that this document replaces the prior guide of the same designation that was previously titled *Standard Practice for Assessment of Vapor Intrusion into Structures on Property Involved in Real Estate Transactions*. Designation E2600-08.

<sup>10</sup> The copyrighted guide is available for purchase; Targus can assist the client in obtaining a copy for its review and edification.

information on which this limited VES is based is limited solely to that identified during the course of the Phase I ESA of which this section is a part.

Targus noted that Holiday Cleaners, the dry cleaning facility located on the south-adjacent property, was located over 800 feet south of the nearest subject property building. Based on distance of nearby regulated facilities, lack of reported releases, evaluation of local topography, and review of regulatory and historical sources, as discussed elsewhere throughout this report, no facilities were identified that present a vapor encroachment condition or *business environmental risk* to the subject property.

#### 8.2.12 Limited PCB-Containing Building Materials Screening

The improvements located on the subject property were constructed between 1971 and 1998, several prior to the 1979 ban on PCB manufacture or distribution in commerce within the United States under the Toxic Substances Control Act (TSCA). PCBs have been found in various building products in buildings constructed or renovated between approximately 1950 and 1979, particularly caulk, glazing, putty, elastomeric sealants, and paint. According to the EPA, PCBs were primarily used in or around windows, door frames, stairways, building joints, masonry columns, and other masonry building materials because of their properties as a plasticizer. The EPA does not compel building owners to proactively conduct bulk sampling of suspect PCB-containing building materials. The EPA requires that building materials containing PCBs at levels greater than 50 ppm must be removed upon discovery. Additionally, if demolition or renovation activities are likely to impact such materials, TSCA regulations require that the waste be properly characterized and disposed.

## 9.0 REFERENCES

- *San Mateo, California Quadrangle*, U.S. Geological Survey (USGS) 7.5 minute series Topographic Map, photo-revised 1997;
- *Soil Survey of San Mateo County, California*, United States Department of Agriculture, Natural Resources Conservation Service, dated 1961;
- *EDR-Radius Map Report with GeoCheck, Peninsula Office Park, 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive, San Mateo, CA 94403*, Inquiry Number 5278277.2s, dated May 2, 2018;
- Aerial photographs purchased from EDR, dated 1943, 1946, 1956, 1963, 1968, 1974, 1982, 1993, 1998, 2005, 2010 and 2014;
- Aerial photograph obtained from Google Earth, dated 2017;
- *EDR-City Directory Image Report, Peninsula Office Park, 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive, San Mateo, CA 94403*, Inquiry Number 5278277.5, dated May 2, 2018;
- Historical Fire Insurance Maps were requested from EDR. According to EDR, no Historical Fire Insurance Maps were available for the subject property;

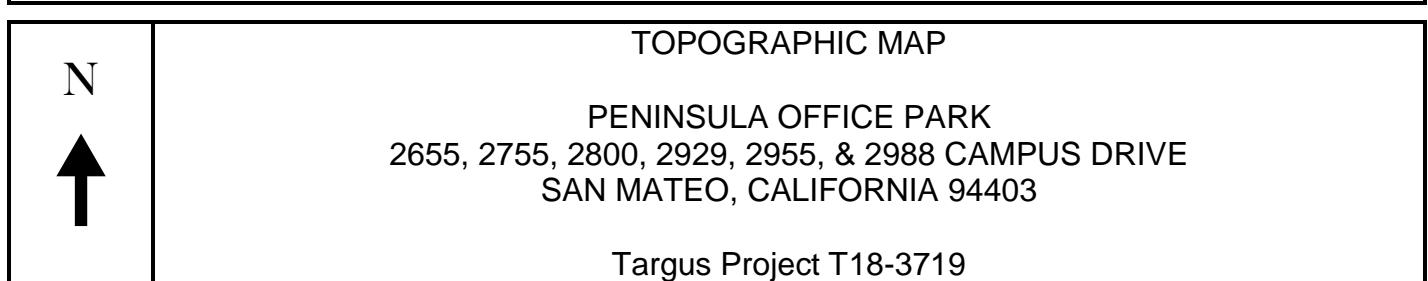
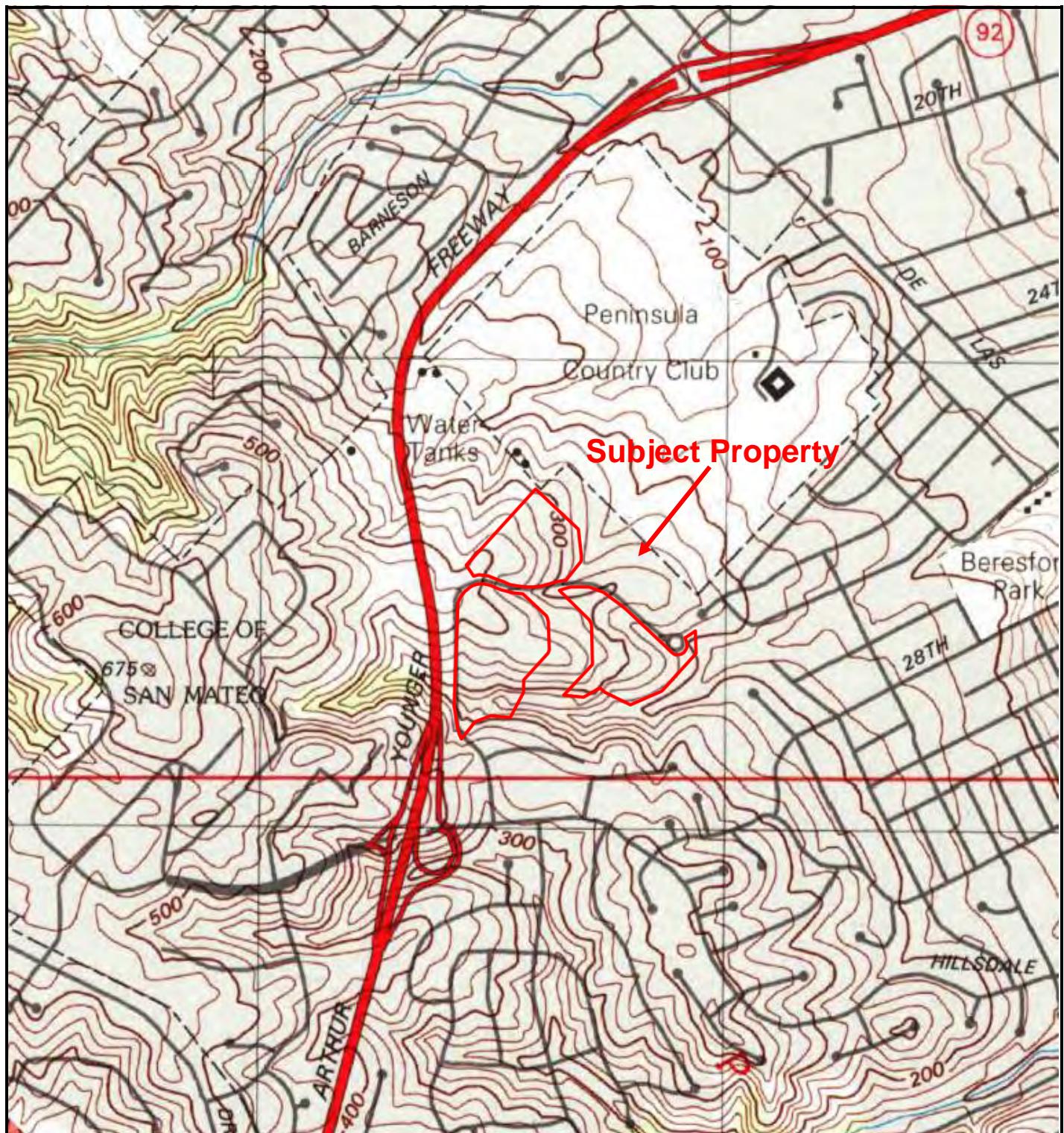
- *Phase I Environmental Site Assessment*, Peninsula Office Park, 2600, 2655, 2755, 2800, 2929, 2955 & 2988 Campus Drive, San Mateo, California 94403, IVI Project No. PC40208560, dated March 3, 2014, prepared by IVI Assessment Services, Inc.;
- Chain-of-Title Search performed by EDR, dated May 14, 2018;
- Environmental Lien and AUL Search performed by EDR, dated May 3, 2018;
- Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), dated July 16, 2015, Community Panel Number 162, Map Number 06081C0162F;
- USFWS NWI map, obtained online at <http://www.fws.gov/wetlands/Data/Mapper.html>;
- EPA Map of Radon Zones, viewed online at <http://www.epa.gov/radon/zonemap.html>;
- List of Threatened and Endangered Species, viewed online at <http://ecos.fws.gov/ipac/>;
- National Pipeline Mapping System (NPMS) map, viewed online at <https://www.npms.phmsa.dot.gov/>;
- 2016 Water Quality Report for the Bayshore District (San Mateo), obtained online at <https://www.calwater.com/docs/ccr/2016/bay-sm-2016.pdf>;
- ALTA/ASCM Title Survey in San Mateo, California, dated January 30, 2015;
- Interviews with Ms. Krista Dixon and Mr. Gary Wilson of Hudson Pacific Properties (property management firm);
- Interview with Chris Aissa of Ameritex Elevator Service; and
- Public information requests submitted to the City of San Mateo, San Mateo County, the Regional Water Quality Control Board, the California Department of Toxic Substances Control and the California Environmental Protection Agency.

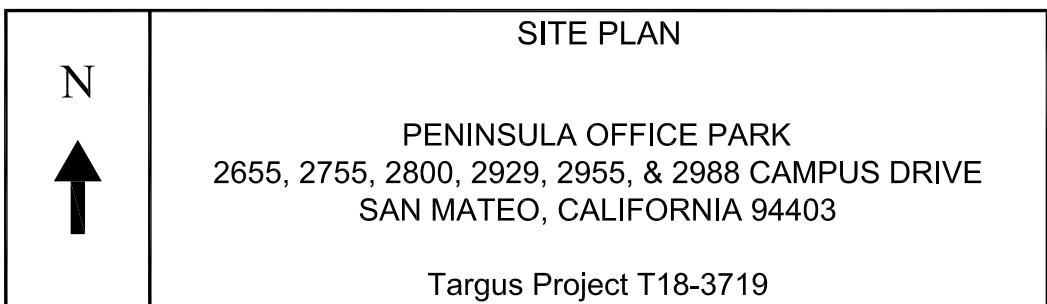
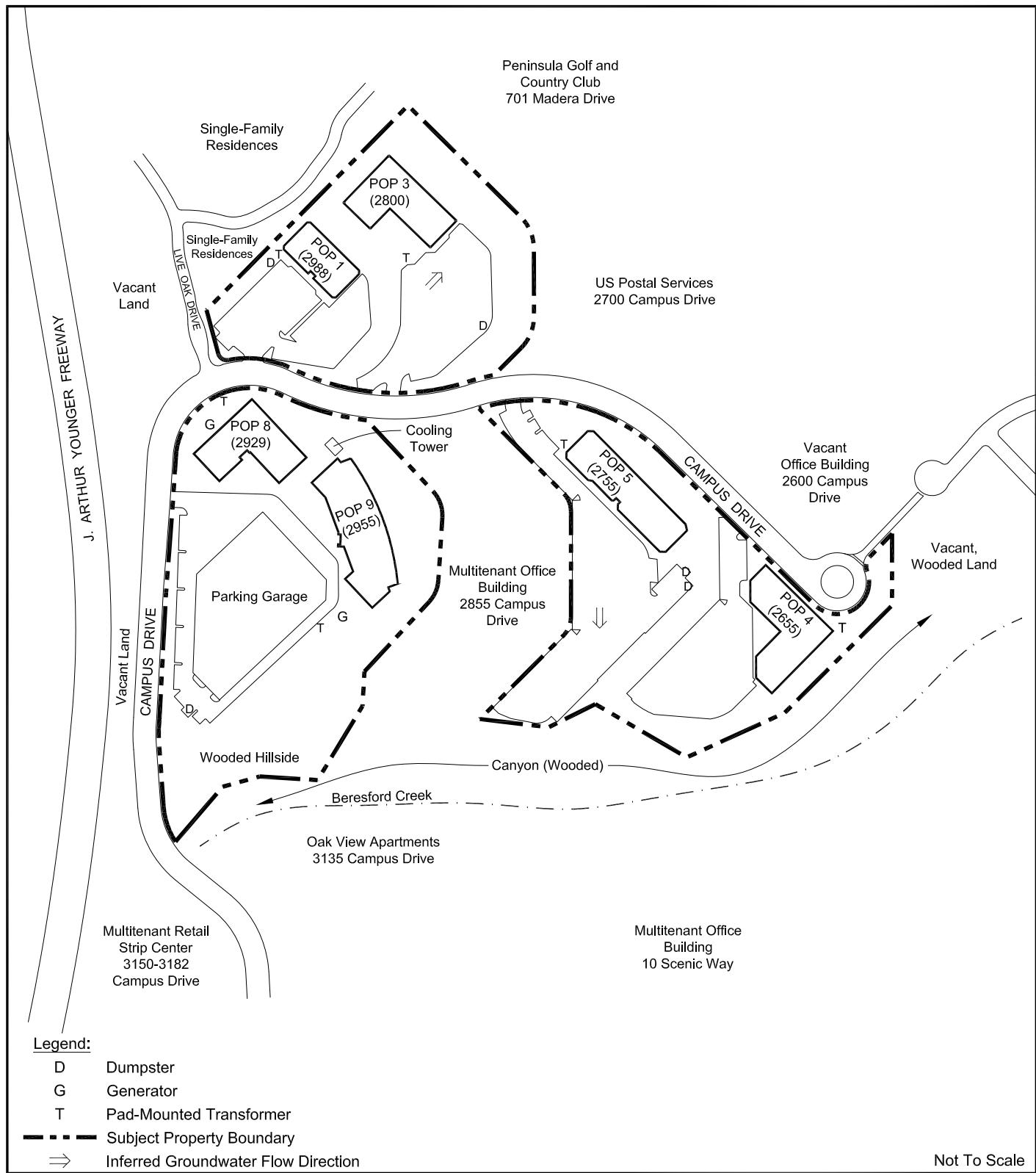
## **Appendices**

**This copy of the report is not exhaustive. The full version of this assessment may include additional appendix materials that are not contained herein due to practical or technological limitations. Those additional materials are available to the Client and relying parties on request and are hereby incorporated by reference.**

## **Appendix A**

## **Figures**







Source: Google Earth, 2017  
Not to Scale



Source: Google Earth, 2017  
Not to Scale

#### SITE (VICINITY) MAP

#### PENINSULA OFFICE PARK

2655, 2755, 2800, 2929, 2955, & 2988 CAMPUS DRIVE  
SAN MATEO, CALIFORNIA 94403



Targus Project T18-3719

## **Appendix B Photographs**



1. View of the POP 1 building, facing to the northeast.



2. View of the POP 3 building, facing to the northwest.



3. View of the POP 4 building, facing to the southeast.



4. View of the POP 5 building, facing to the north.



5. View of the POP 8 building, facing to the northeast.



6. View of the POP 9 building, facing to the east.



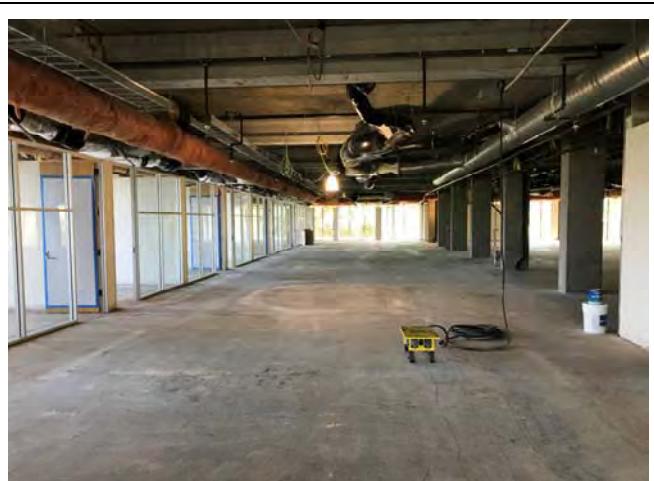
7. View of typical lobby (POP 9).



8. View of typical tenant space (POP 3).



9. View of typical tenant space (POP 8).



10. View of tenant space undergoing renovation (POP 4).



11. View of a typical maintenance room at the subject property (POP 9).



12. View of interior of flammable storage cabinet located in the maintenance room (POP 9).



13. View of elevators at POP 8.



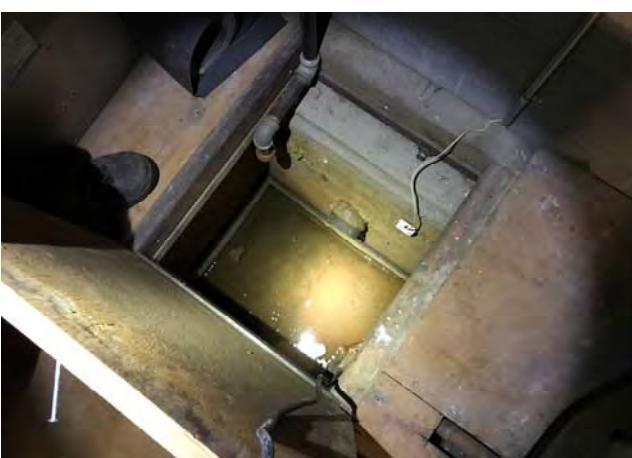
14. View of typical elevator equipment room (POP 5).



15. View of typical elevator pit area (POP 3).



16. View of signage indicating an asbestos hazard area in POP 1.



17. View of sump/ sump pump (POP 3).



18. View of roof of POP 9 showing cooling tower equipment and chemicals.



19. View of grease trap located in the kitchen of the café in POP 9.



20. View of backup generator and associated diesel AST at the subject property, located south of POP 9.



21. View of backup generator and associated diesel AST at the subject property, located at POP 8.



22. View of vacant wooded area in the southern portion of the subject property where Beresford Creek flows.



23. View of typical pad mounted transformer at the subject property.



24. View of stormwater drainage system at the subject property, located south of POP 9 .

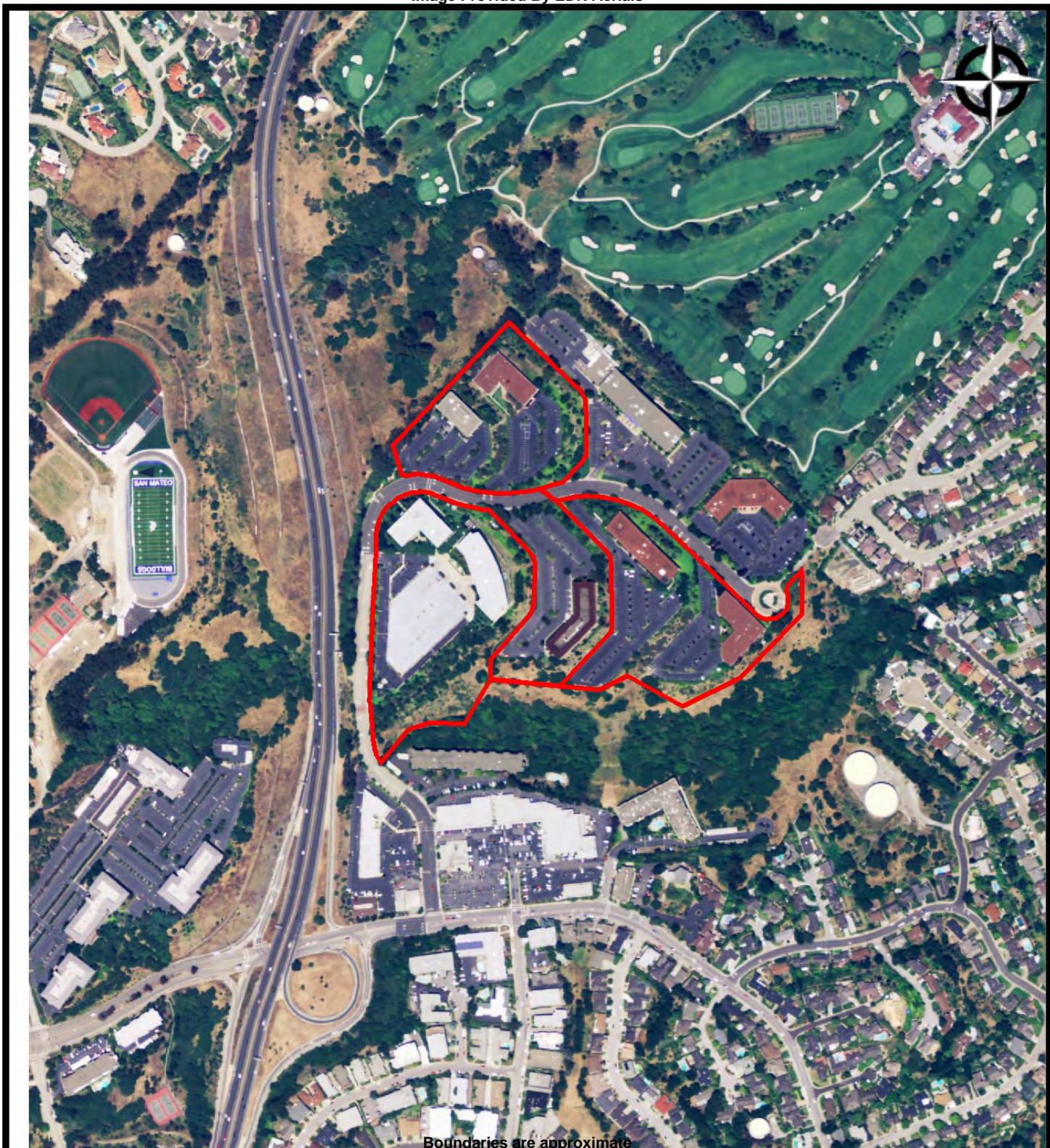
## **Appendix C**

### **Historical Research Documentation**



**TARGUS**  
ENVIRONMENTAL

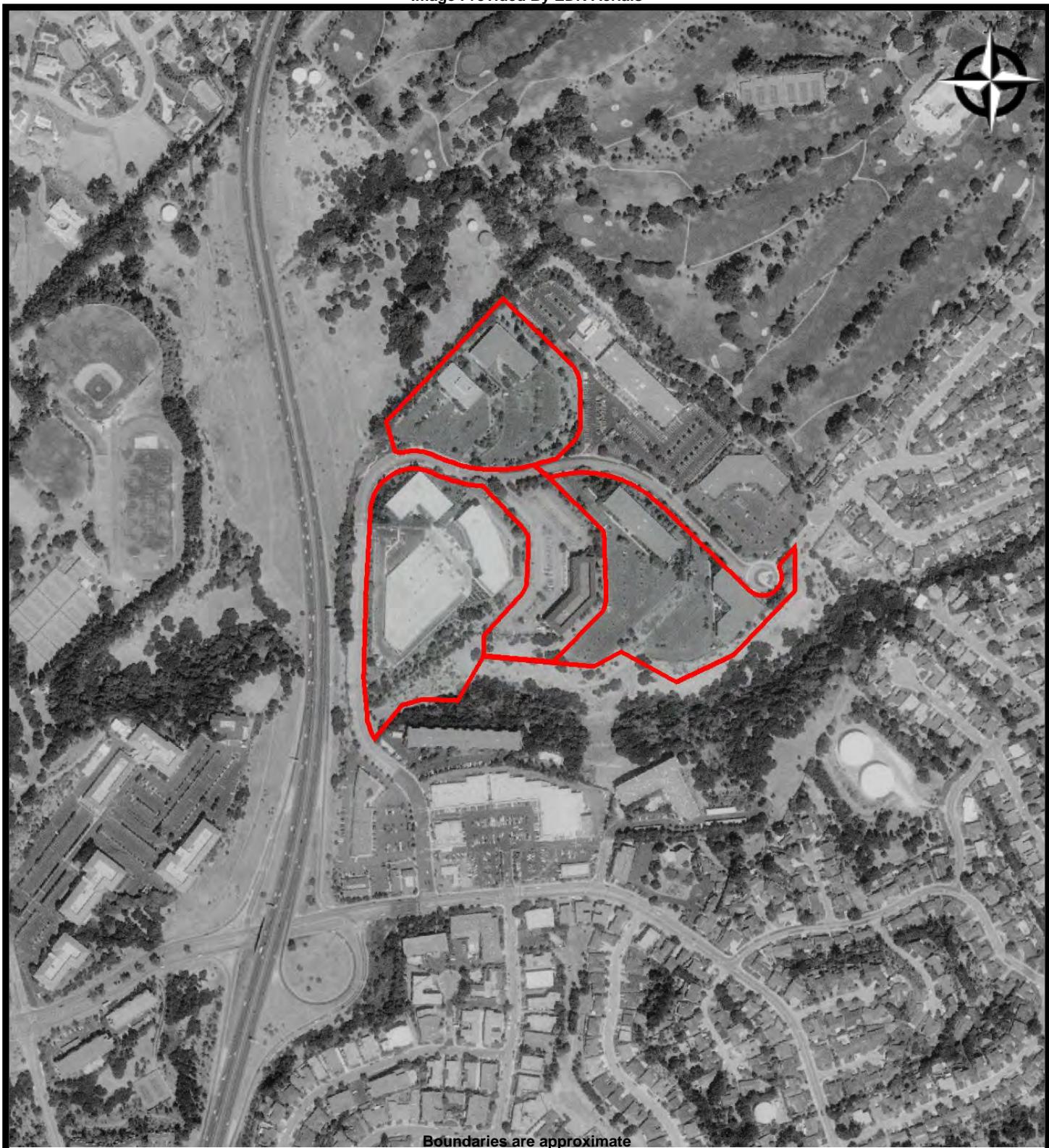
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**San Mateo, California 94403**  
**Not to Scale**



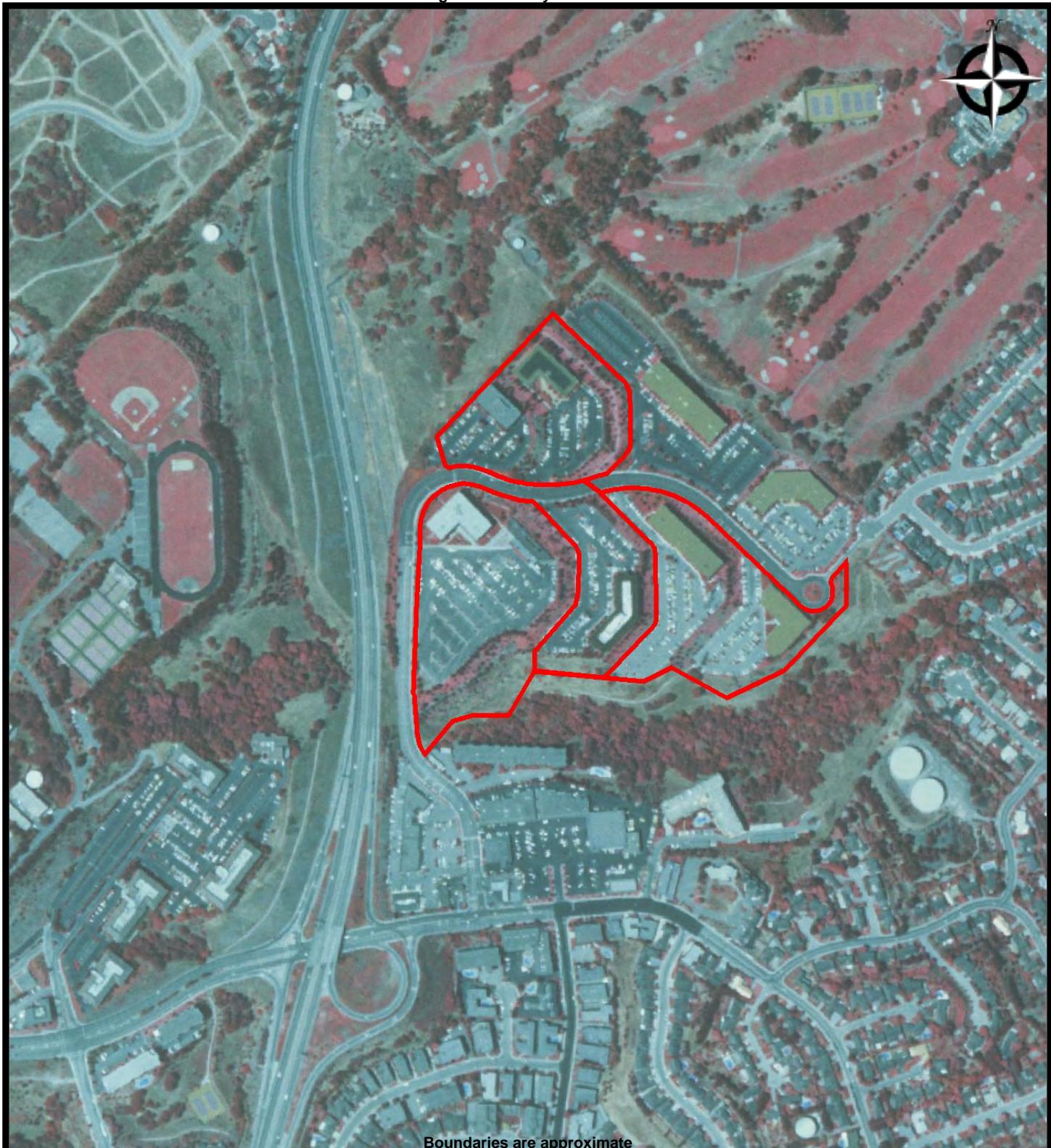
**TARGUS**  
ENVIRONMENTAL

**AERIAL - 2005**  
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**2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive**  
**San Mateo, California 94403**

**Not to Scale**



**AERIAL - 1998**  
**Peninsula Office Park**  
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**San Mateo, California 94403**  
**Not to Scale**



**TARGUS**  
ENVIRONMENTAL

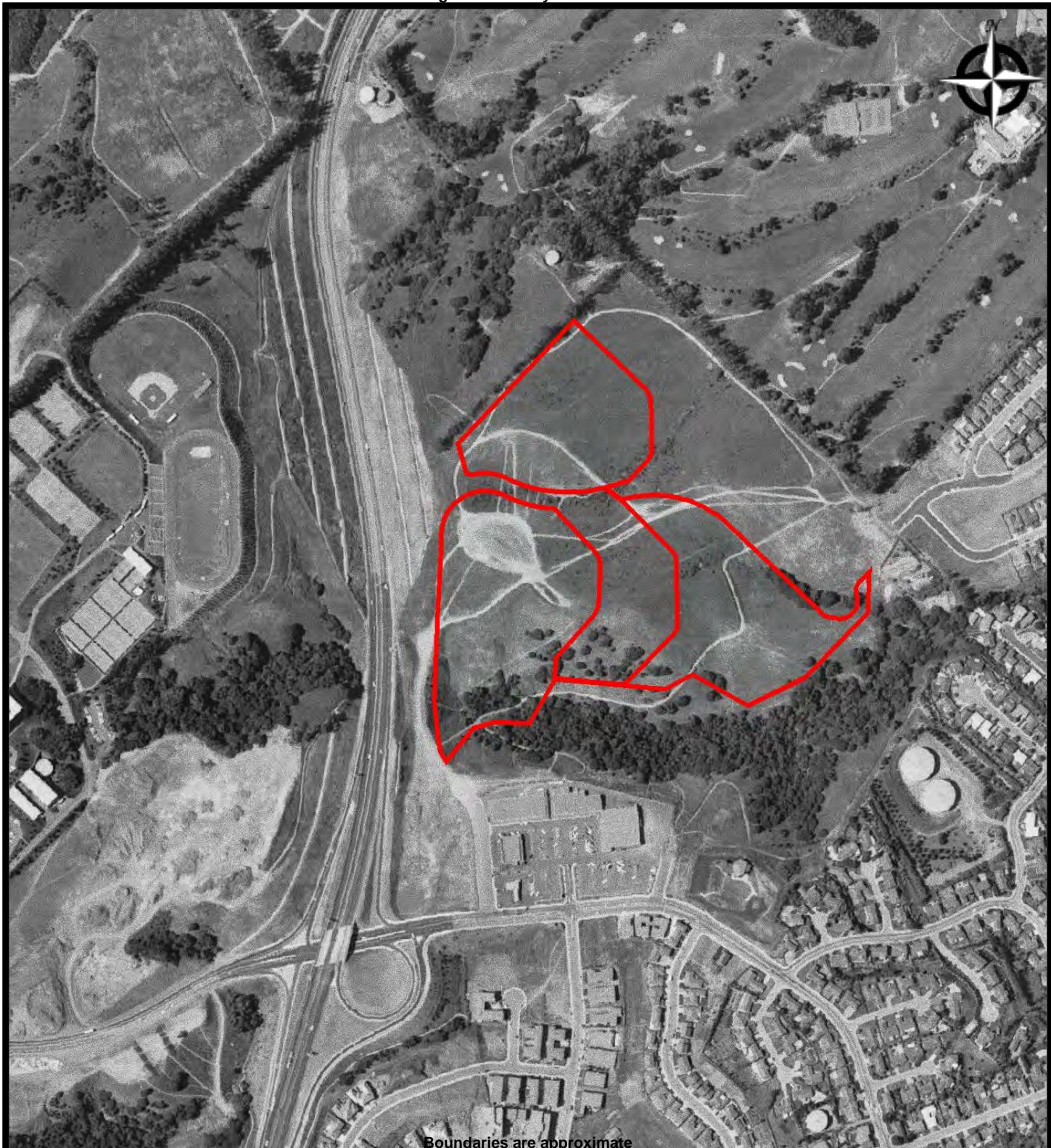
**AERIAL - 1982**  
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**San Mateo, California 94403**  
**Not to Scale**



**TARGUS**  
ENVIRONMENTAL

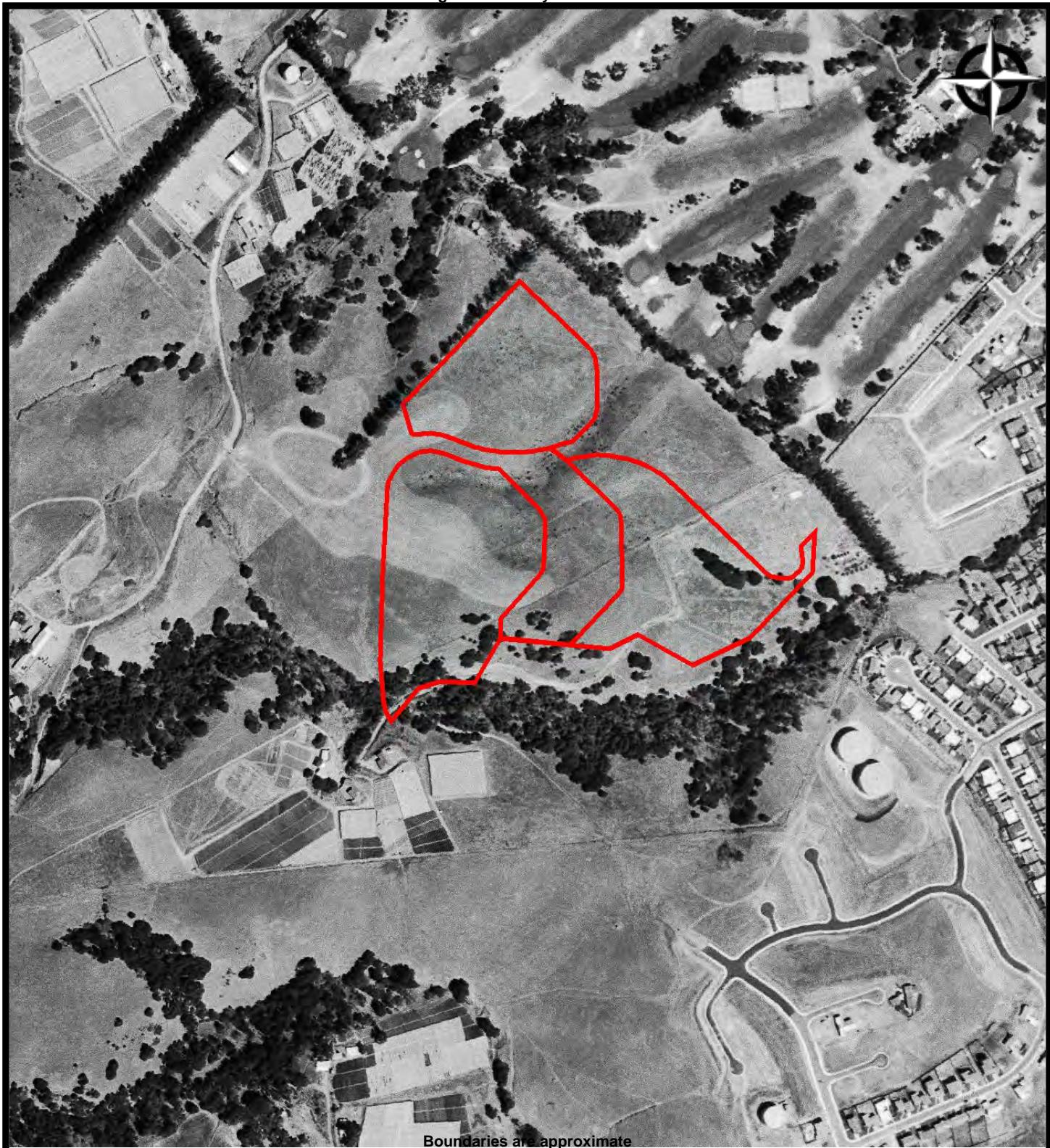
**AERIAL - 1974**  
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**San Mateo, California 94403**

**Not to Scale**



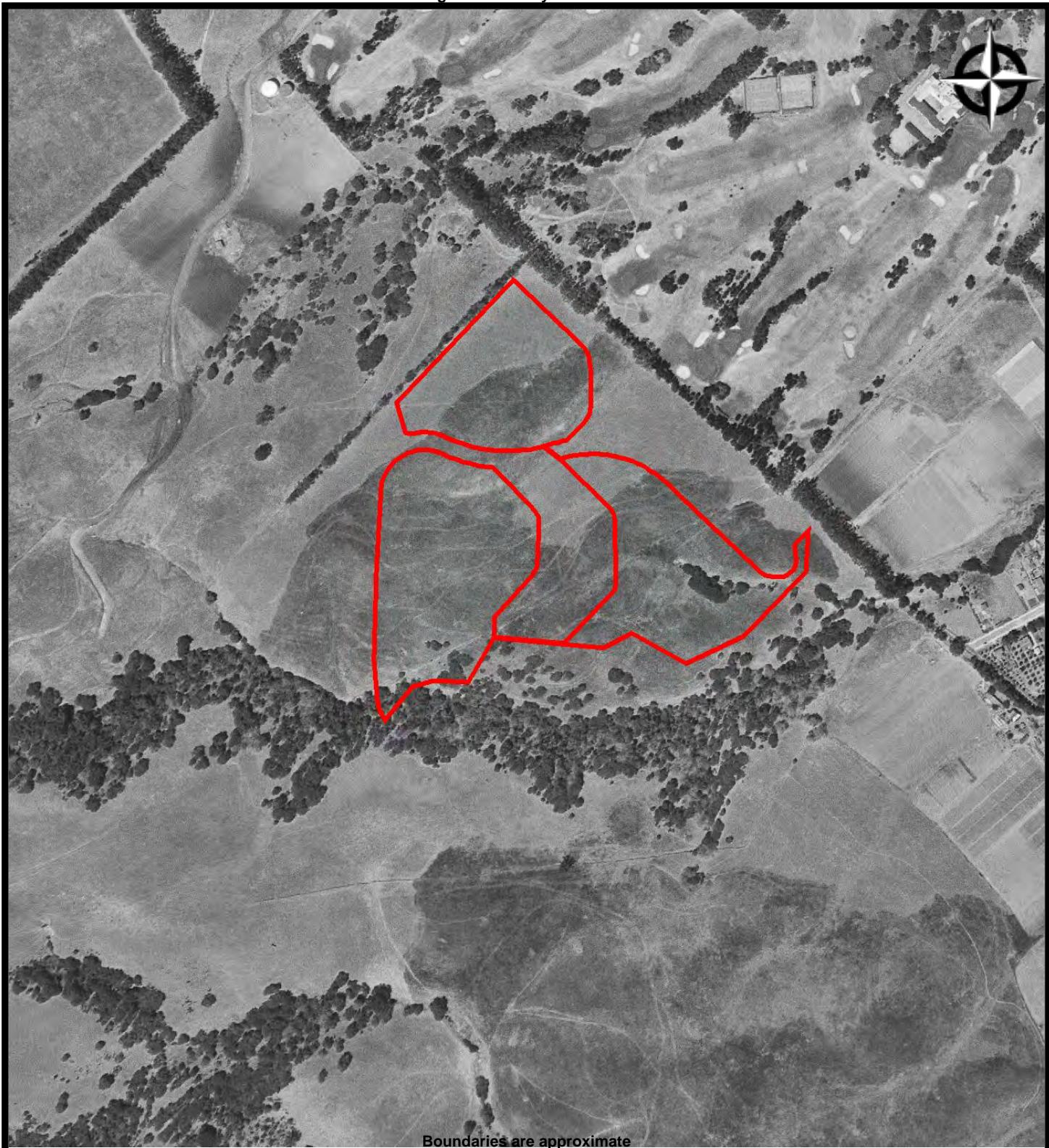
**TARGUS**  
ENVIRONMENTAL

**AERIAL - 1968**  
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**San Mateo, California 94403**  
**Not to Scale**



**TARGUS**  
ENVIRONMENTAL

**AERIAL - 1956**  
**Peninsula Office Park**  
**2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive**  
**San Mateo, California 94403**  
**Not to Scale**



**TARGUS**  
ENVIRONMENTAL

**AERIAL - 1946**  
**Peninsula Office Park**  
**2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive**  
**San Mateo, California 94403**  
**Not to Scale**

# Certified Sanborn® Map Report

05/01/18

**Site Name:**

Peninsula Office Park  
2655, 2755, 2800, 2929, 2955,  
San Mateo, CA 94403  
EDR Inquiry # 5278277.3

**Client Name:**

Targus Associates  
1900 Diplomat Drive  
Dallas, TX 75234  
Contact: Kate Finley



The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Targus Associates were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting [www.edrnet.com/sanborn](http://www.edrnet.com/sanborn).

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

**Certified Sanborn Results:**

**Certification #** BD3C-454E-B49F

**PO #** T18-3719

**Project** Peninsula Office Park



Sanborn® Library search results

Certification #: BD3C-454E-B49F

**UNMAPPED PROPERTY**

This report certifies that the complete holdings of the Sanborn Library, LLC collection have been searched based on client supplied target property information, and fire insurance maps covering the target property were not found.

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- Library of Congress
- University Publications of America
- EDR Private Collection

*The Sanborn Library LLC Since 1866™*

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Peninsula Office Park  
2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo, CA 94403

Inquiry Number: 5278277.14S  
May 14, 2018

## The EDR 1940 Chain of Title

## EDR Chain of Title

The EDR Chain of Title Report tracks a line of successive owners from the present back to 1940 of a particular parcel of property, linked together by recorded transactions which pass title. Available nationwide, this report provides a summary of a property's ownership history and is a valuable source for determining the prior uses of a property.

A network of professional abstractors following established procedures, uses client supplied address information to locate:

- Historical Chain of Title research
- Leases and Miscellaneous

### Thank you for your business.

Please contact EDR at 1-800-352-0050  
with any questions or comments.

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## EDR Chain of Title

### TARGET PROPERTY INFORMATION

#### ADDRESS

Peninsula Office Park  
2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo, CA 94403

#### Research Source

Source 1: [San Mateo County Recorder of Deeds](#)  
Source 2: [San Mateo County Assessor](#)  
Examiner's Note: Public records of San Mateo County, California were searched from January 1, 1940 to May 14, 2018, and no other deeds vesting title in the subject property were found of record during the period searched.

### PROPERTY DESCRIPTION

Current Owner: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Legal Description: All that certain piece or parcel of land being Lot 1 and an undivided 1/8 interest in Parcel 'A' Common Area of "Peninsula Office Park, City of San Mateo, San Mateo County, California", filed 10/02/1972 in Book 78 of Maps at Pages 32 and 33, situate and lying in the County of San Mateo, State of California.  
Property Identifiers: 041-521-010

Current Owner: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Legal Description: All that certain piece or parcel of land being Lot 2 and an undivided 1/8 interest in Parcel 'A' Common Area of "Peninsula Office Park, City of San Mateo, San Mateo County, California", filed 10/02/1972 in Book 78 of Maps at Pages 32 and 33, situate and lying in the County of San Mateo, State of California.  
Property Identifiers: 041-521-020

Current Owner: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Legal Description: All that certain piece or parcel of land being Lot 5 and an undivided 1/8 interest in Parcel 'A' Common Area of "Peninsula Office Park, City of San Mateo, San Mateo County, California", filed 10/02/1972 in Book 78 of Maps at Pages 32 and 33, situate and lying in the County of San Mateo, State of California.  
Property Identifiers: 041-522-010

Current Owner: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Legal Description: All that certain piece or parcel of land being Lot 6 and an undivided 1/8 interest in Parcel 'A' Common Area of "Peninsula Office Park, City of San Mateo, San Mateo County, California", filed 10/02/1972 in Book 78 of Maps at Pages 32 and 33, situate and lying in the County of San Mateo, State of California.  
Property Identifiers: 041-522-020

Current Owner: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Legal Description: All that certain piece or parcel of land being a portion of Parcels 1 and 2, as said parcels are shown on that certain map entitled, "Parcel Map No. 154", filed on 12/22/1976 in Book 34 of Parcel Maps, at Page 34 and an undivided 1/16 interest in Parcel 'A' Common Area of "Peninsula Office Park, City of San Mateo, San Mateo County, California", filed 10/02/1972 in Book 78 of Maps at Pages 32 and 33, situate and lying in the County of San Mateo, State of California.  
Property Identifiers: 041-522-070

Current Owner: Hudson Peninsula Office Park, LLC, a Delaware limited liability company

Legal Description: All that certain piece or parcel of land being a portion of Parcels 1 and 2, as said parcels are shown on that certain map entitled, "Parcel Map No. 154", filed on 12/22/1976 in Book 34 of Parcel Maps, at Page 34, situate and lying in the County of San Mateo, State of California.

Property Identifiers: 041-522-080

**HISTORICAL CHAIN OF TITLE**

See Exhibit "A"

**LEASES AND MISCELLANEOUS**

See Exhibit "B"

**EDR Chain of Title**

**Chain of Title**

**Exhibit “A”**

## EDR Chain of Title

### HISTORICAL CHAIN OF TITLE

#### PARCEL NO. 041-521-010

##### **Chain 1**

Type of Deed: Deed  
Title is vested in: San Mateo Country Club  
Title received from: City of San Mateo  
Date Recorded: 07/23/1946  
Book: 206  
Page: 347

##### **Chain 2**

Type of Deed: Deed  
Title is vested in: Peninsula Office Park  
Title received from: San Mateo Country Club  
Date Recorded: 11/17/1965  
Instrument #: 43621

##### **Chain 3**

Type of Deed: Grant Deed  
Title is vested in: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Title received from: EOP-Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, LP, a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership  
Date Executed: 04/01/2015  
Date Recorded: 04/03/2015  
Instrument #: 32359

#### PARCEL NO. 041-521-020

##### **Chain 1**

Type of Deed: Deed  
Title is vested in: San Mateo Country Club  
Title received from: City of San Mateo  
Date Recorded: 07/23/1946  
Book: 206  
Page: 347

##### **Chain 2**

Type of Deed: Deed  
Title is vested in: Peninsula Office Park  
Title received from: San Mateo Country Club  
Date Recorded: 11/17/1965  
Instrument #: 43621

**Chain 3**

Type of Deed: Grant Deed  
Title is vested in: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Title received from: EOP-Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, LP, a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership  
Date Executed: 04/01/2015  
Date Recorded: 04/03/2015  
Instrument #: 32359

**PARCEL NO. 041-522-010****Chain 1**

Type of Deed: Deed  
Title is vested in: San Mateo Country Club  
Title received from: City of San Mateo  
Date Recorded: 07/23/1946  
Book: 206  
Page: 347

**Chain 2**

Type of Deed: Deed  
Title is vested in: Peninsula Office Park  
Title received from: San Mateo Country Club  
Date Recorded: 11/17/1965  
Instrument #: 43621

**Chain 3**

Type of Deed: Grant Deed  
Title is vested in: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Title received from: EOP-Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, LP, a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership  
Date Executed: 04/01/2015  
Date Recorded: 04/03/2015  
Instrument #: 32359

**PARCEL NO. 041-522-020****Chain 1**

Type of Deed: Deed  
Title is vested in: San Mateo Country Club  
Title received from: City of San Mateo  
Date Recorded: 07/23/1946  
Book: 206  
Page: 347

**Chain 2**

Type of Deed: Deed  
Title is vested in: Peninsula Office Park  
Title received from: San Mateo Country Club  
Date Recorded: 11/17/1965  
Instrument #: 43621

**Chain 3**

Type of Deed: Grant Deed  
Title is vested in: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Title received from: EOP-Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, LP, a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership  
Date Executed: 04/01/2015  
Date Recorded: 04/03/2015  
Instrument #: 32359

**PARCEL NO. 041-522-070****Chain 1**

Type of Deed: Deed  
Title is vested in: San Mateo Country Club  
Title received from: City of San Mateo  
Date Recorded: 07/23/1946  
Book: 206  
Page: 347

**Chain 2**

Type of Deed: Deed  
Title is vested in: Peninsula Office Park  
Title received from: San Mateo Country Club  
Date Recorded: 11/17/1965  
Instrument #: 43621

**Chain 3**

Type of Deed: Grant Deed  
Title is vested in: Hudson Peninsula Office Park, LLC, a Delaware limited liability company  
Title received from: EOP-Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, LP, a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership  
Date Executed: 04/01/2015  
Date Recorded: 04/03/2015  
Instrument #: 32359

**PARCEL NO. 041-522-080****Chain 1**

Type of Deed: Deed  
Title is vested in: San Mateo Country Club  
Title received from: City of San Mateo  
Date Recorded: 07/23/1946  
Book: 206  
Page: 347

**Chain 2**

Type of Deed: Deed  
Title is vested in: Peninsula Office Park  
Title received from: San Mateo Country Club  
Date Recorded: 11/17/1965  
Instrument #: 43621

**Chain 3**

Type of Deed: Grant Deed

Title is vested in: Hudson Peninsula Office Park, LLC, a Delaware limited liability company

Title received from: EOP-Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, LP, a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership

Date Executed: 04/01/2015

Date Recorded: 04/03/2015

Instrument #: 32359

**EDR Chain of Title**

**LEASES and MISCELLANEOUS**

**Exhibit “B”**

## EDR Chain of Title

### LEASES and MISCELLANEOUS

1. Type of Instrument:

First Party:

Second Party:

Recorded:

Book:

Page:

Document No.:

Comments:

2. Type of Instrument:

First Party:

Second Party:

Recorded:

Book:

Page:

Document No.:

Comments:

**FIRST AMERICAN TITLE INSURANCE COMPANY**

**RECORDING REQUESTED BY  
AND WHEN RECORDED MAIL TO:**

Hudson Peninsula Office Park, LLC  
c/o Hudson Pacific Properties  
11601 Wilshire Blvd., Suite 1600  
Los Angeles, California 90025  
Attn: Alex Vouvalides

**AND MAIL TAX STATEMENTS TO:**

Hudson Peninsula Office Park, LLC  
c/o Hudson Pacific Properties  
11601 Wilshire Blvd., Suite 1600  
Los Angeles, California 90025  
Attn: Dale Shimoda

APN No.: 041-521-010,041-521-020,041-522-020,041-521-040,041-522-070,041-522-080,041-522-010

**2015-032359**

11:45 am 04/03/15 DE Fee: 36.00

Count of Pages 8 SM

Recorded in Official Records

County of San Mateo

Mark Church

Assessor-County Clerk-Recorder



\* R 0 0 0 2 0 0 1 9 9 7 \*

(Space Above for Recorder's Use) *81*

The undersigned Grantor declares:

County Documentary Transfer Tax is \$221,282.05  
City of San Mateo Documentary Transfer Tax is \$1,005,827.50  
Computed on full value of the interest or property conveyed.

**GRANT DEED**

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, EOP-Peninsula Office Park L.L.C., a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, L.P. a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership ("Grantor"), does hereby GRANT, SELL AND CONVEY to Hudson Peninsula Office Park, LLC, a Delaware limited liability company ("Grantee"), all of that certain real property in the County of San Mateo, State of California, as more particularly described in Exhibit A attached hereto and incorporated herein by this reference and made a part hereof (the "Land"), together with any and all buildings and structures located thereon and the associated parking and landscaped areas and all other improvements located thereon (collectively, the "Improvements"), all of Grantor's right, title and interest in and to all rights, privileges, easements, and appurtenances benefiting the Land and/or the Improvements, including without limitation all rights as declarant, if any, under any easements, covenants, conditions and restrictions, to the extent belonging or appertaining to the Land or such structures and improvements (together with the Land and the Improvements, the "Property").

This conveyance is made and accepted subject to all real property taxes and assessments not due and payable, unrecorded leases, all matters of record as of the date hereof and all matters that would be reflected on an accurate survey or shown by a physical inspection of the Property, as of the date hereof.

**Mail tax statements as directed above**

[Peninsula Office Park]  
010396-1455-14908-ACTIVE.16934378

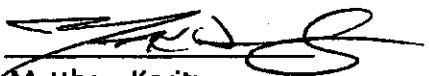
*NCS - 65081*

This document is dated April 1, 2015.

"GRANTOR"

EOP-PENINSULA OFFICE PARK L.L.C.

By:



Name: Matthew Koritz

Title: Vice President – Legal, General Counsel

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF ILLINOIS )

COUNTY OF COOK )

On 2/25 2015, before me, Sharon M Roulz, a Notary Public, personally appeared Matthew Koritz, who proved to me on the basis of satisfactory evidence to be the persons whose name is subscribed to the within instrument, and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature Sharon M Roulz



**EXHIBIT A**

**Legal Description**

**PARCEL A:**

**PARCEL ONE:**

Lot 1, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL TWO:**

An undivided 1/8 interest in Parcel 'A' Common Area, as designated on the Map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL B:**

**PARCEL ONE:**

Lot 2, as shown on that certain map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL TWO:**

An undivided 1/8 interest in Parcel 'A' Common Area as shown on that certain map entitled "PENINSULA OFFICE PARK CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California on October 2, 1972 in Book 78 of Maps, at pages 32 and 33, San Mateo County Records.

**PARCEL C:**

**PARCEL ONE:**

Lot 6, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL TWO:**

An undivided 1/8 interest in Parcel 'A' Common Area, as designated on the map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which

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map was filed in the office of the Recorder of the County of San Mateo, State of California on October 2, 1972 in Book 78 of Maps at Pages 32 and 33.

**PARCEL D:**

**PARCEL ONE:**

Lot 4, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL TWO:**

An undivided 1/8 interest in Parcel 'A' Common Area, as designated on the map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL E:**

**PARCEL ONE:**

A portion of Parcels 1 and 2, as said parcels are shown on that certain map entitled "PARCEL MAP NO. 154", filed in the office of the County Recorder of San Mateo County, State of California, on December 22, 1976 in Book 34 of Parcel Maps at page(s) 34, and being more particularly described as follows:

**BEGINNING** at the most Southerly corner of said Parcel 2 and from which point a radial line bears North 56° 38' 58" East; thence along the Westerly and Northerly line of said Parcel 2 the following ten courses;

- 1) Northerly along a curve to the right having a radius of 167.50 feet, through a central angle of 29° 17' 00", an arc length of 85.61 feet;
- 2) North 4° 04' 02" West, a distance of 148.37 feet to the beginning of a tangent curve to the right;
- 3) Along said curve having a radius of 192.50 feet, through a central angle of 7° 05' 13", an arc length of 23.81 feet;
- 4) North 3° 01' 11" East, a distance of 313.89 feet;
- 5) North 4° 17' 34" East, a distance of 270.07 feet;
- 6) North 3° 01' 11" East, a distance of 38.15 feet to the beginning of a tangent curve to the right;

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7) Along said curve having a radius of 161.50 feet, through a central angle of  $54^{\circ} 09' 50''$ , an arc length of 152.67 feet;

8) North  $57^{\circ} 11' 01''$  East, a distance of 7.00 feet to the beginning of a tangent curve to the right;

9) Along said curve having a radius of 161.50 feet, through a central angle of  $58^{\circ} 51' 32''$ , an arc length to 165.91 feet to a point of reverse curvature;

10) Along said curve having a curve having a radius of 597.50 feet, through a central angle of  $12^{\circ} 55' 09''$ , an arc length of 134.73 feet to the most Northeasterly corner of said Parcel 2 and the most Northwesterly corner of said Parcel 1; thence leaving said Parcel 2 line and along the Northerly line of said Parcel 1 said curve having a radius of 597.50 feet, through a central angle of  $1^{\circ} 11' 55''$ , an arc length of 12.50 feet; thence leaving said Parcel 1 line South  $46^{\circ} 48' 30''$  West, a distance of 92.39 feet; thence South  $43^{\circ} 11' 30''$  East, a distance of 33.00 feet; thence South  $46^{\circ} 48' 30''$  West, a distance of 394.53 feet; thence South  $1^{\circ} 58' 13''$  West, a distance of 226.01 feet; thence South  $43^{\circ} 11' 30''$  West, a distance of 86.14 feet; thence South  $28^{\circ} 47' 31''$  East, a distance of 195.81 feet to the Southerly line of said Parcel 2; thence along said Parcel 2 line South  $74^{\circ} 33' 08''$  West, a distance of 87.00 feet; thence continuing along said line South  $40^{\circ} 38' 08''$  West, a distance of 164.3 Being the property described as "Proposed Parcel Two" in that certain Approval of Lot Line Adjustment, recorded May 23, 1997, Document No. 97061640.

**PARCEL TWO:**

An undivided 1/16th interest in Parcel 'A' Common Area, as designated on the Map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo County, State of California on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL F:**

**PARCEL ONE:**

A portion of Parcels 1 and 2, as said parcels are shown on that certain map entitled "PARCEL MAP NO. 154", filed in the office of the County Recorder of San Mateo County, State of California, on December 22, 1976 in Book 34 of Parcel Maps at page(s) 34, and being more particularly described as follows:

BEGINNING at the most Northerly corner of said Parcel 1 from which point a radial line bears North  $13^{\circ} 07' 24''$  East; thence along the Northerly, Easterly, and Southerly line of said Parcel 1 of the following seven courses;

- 1) Easterly along a curve to the left having a radius of 597.50 feet, through a central angle of  $1^{\circ} 11' 55''$ , an arc length of 12.50 feet to the true point of beginning.
- 2) Continuing along said curve to the left having a radius of 597.50 feet, through a central angle

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of 5° 30' 50", an arc length of 57.50 feet;

3) South 42° 57' 37" East, a distance of 220.08 feet to the beginning of a tangent curve to the right;

4) Along said curve having a radius of 80.00 feet, through a central angle of 46° 35' 20", an arc length of 65.05 feet;

5) South 3° 37' 43" West, a distance of 142.48 feet to the beginning of a tangent curve to the right;

6) Along said curve having a radius of 80.00 feet, through a central angle of 39° 12' 37", an arc length of 54.75 feet;

7) South 42° 50' 20" West, a distance of 208.30 feet to the most Southerly corner of said Parcel 1 and the most Southerly corner of said Parcel 2; thence leaving said Parcel 1 line and along the Southerly line of said Parcel 2 the following four courses;

1) South 42° 50' 20" West, a distance of 7.36 feet;

2) South 3° 22' 21" West, a distance of 78.64 feet;

3) South 31° 14' 08" West, a distance of 196.19 feet;

4) North 86° 28' 52" West, a distance of 132.00 feet; thence leaving said Parcel 2 line North 28° 47' 31" West, a distance of 195.81 feet; thence North 43° 11' 30" West, a distance of 86.14 feet; thence North 1° 58' 13" East, a distance of 226.01 feet; thence North 46° 48' 30" East, a distance of 394.54 feet; thence North 43° 11' 30" West, a distance of 33.00 feet; thence North 46° 48' 30" East, a distance of 92.39 feet to the true point of beginning.

Being the property described as "Proposed Parcel One" in that certain Approval of Lot Line Adjustment recorded May 23, 1997, Document No. 97061640.

**PARCEL G:**

**PARCEL ONE:**

Lot 5, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

**PARCEL TWO:**

An undivided 1/8 interest in Parcel 'A' Common Area as designated on the map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California on

010396-1455-14908-ACTIVE.16934378

October 2, 1972 in Book 78 of Maps at Pages 32 and 33.

**PARCEL THREE:**

An easement for parking purposes, being a strip of land over and across Lot 6, as said Lot is shown on the map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California in Book 78 of Maps at pages 32 and 33, said strip of land being more particularly described as follows:

BEGINNING at the Southwesterly corner of Lot 5 as shown on the aforesaid map; thence North 45° 00' 00" East 313.62 feet; thence, along the arc of a curve to the left, having a radius of 82.00 feet, through a central angle of 22° 03' 15" an arc distance of 31.56 feet; thence South 45° 00' 00" West 345.99 feet; thence South 59° 48' 02" East 6.21 feet to the point of beginning.

APN: APN: 041-521-010 (Parcel A), 041-521-020 (Parcel B), 041-522-020 (Parcel C), 041-521-040 (Parcel D), 041-522-070 (Parcel E), 041-522-080 (Parcel F), 041-522-010 (Parcel G)

JPN No.: 041-052-521-01A (Parcel A), 041-052-521-02A (Parcel B), 041-052-522-02A (Parcel C), 041-052-521-04A (Parcel D), 041-052-522-04A (Parcel E), 041-052-522-04.01A (Parcel F), 041-052-522-01A (Parcel G)

010396-1455-14908-ACTIVE.16934378

**Peninsula Office Park**

2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo, CA 94403

Inquiry Number: 5278277.7  
May 03, 2018

## EDR Environmental Lien and AUL Search

## EDR Environmental Lien and AUL Search

The EDR Environmental Lien and AUL Search Report provides results from a search of available current land title records for environmental cleanup liens and other activity and use limitations, such as engineering controls and institutional controls.

A network of professional, trained researchers, following established procedures, uses client supplied address information to:

- search for parcel information and/or legal description;
- search for ownership information;
- research official land title documents recorded at jurisdictional agencies such as recorders' offices, registries of deeds, county clerks' offices, etc.;
- access a copy of the deed;
- search for environmental encumbering instrument(s) associated with the deed;
- provide a copy of any environmental encumbrance(s) based upon a review of key words in the instrument(s) (title, parties involved, and description); and
- provide a copy of the deed or cite documents reviewed.

***Thank you for your business.***

Please contact EDR at 1-800-352-0050  
with any questions or comments.

### Disclaimer - Copyright and Trademark Notice

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. **NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OR DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT.** Purchaser accepts this Report "AS IS". Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

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## EDR Environmental Lien and AUL Search

### TARGET PROPERTY INFORMATION

#### ADDRESS

2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
Peninsula Office Park  
San Mateo, CA 94403

#### RESEARCH SOURCE

##### **Source 1:**

San Mateo Recorder  
San Mateo, CA

### PROPERTY INFORMATION

#### **Deed 1:**

Type of Deed: deed  
Title is vested in: Hudson Peninsula Office Park LLC  
Title received from: EOP Peninsula Office Park LLC  
Deed Dated: 4/1/2015  
Deed Recorded: 4/3/2015  
Book: NA  
Page: na  
Volume: na  
Instrument: na  
Docket: NA  
Land Record Comments:  
Miscellaneous Comments:  
  
**Legal Description:** See Exhibit  
  
**Legal Current Owner:** Hudson Peninsula Office Park LLC  
  
**Parcel # / Property Identifier:** 041-521-010, 041-521-020, 041-522-010, 041-522-020, 041-522-070, 041-522-080  
  
**Comments:** See Exhibit

### ENVIRONMENTAL LIEN

Environmental Lien: Found  Not Found

### OTHER ACTIVITY AND USE LIMITATIONS (AULs)

AULs: Found  Not Found

## **Deed Exhibit 1**

4  
FIRST AMERICAN TITLE INSURANCE COMPANY

RECORDING REQUESTED BY  
AND WHEN RECORDED MAIL TO:

Hudson Peninsula Office Park, LLC  
c/o Hudson Pacific Properties  
11601 Wilshire Blvd., Suite 1600  
Los Angeles, California 90025  
Attn: Alex Vouvalides

AND MAIL TAX STATEMENTS TO:

Hudson Peninsula Office Park, LLC  
c/o Hudson Pacific Properties  
11601 Wilshire Blvd., Suite 1600  
Los Angeles, California 90025  
Attn: Dale Shimoda

APN No.: 041-521-010,041-521-020,041-522-020,041-521-040,041-522-070,041-522-080,041-522-010

**2015-032359**

11:45 am 04/03/15 DE Fee: 36.00

Count of Pages 8 SM

Recorded in Official Records

County of San Mateo

Mark Church

Assessor-County Clerk-Recorder



\* R 0 0 0 2 0 0 1 9 9 7 \*

(Space Above for Recorder's Use) 81

The undersigned Grantor declares:

County Documentary Transfer Tax is \$221,282.05  
City of San Mateo Documentary Transfer Tax is \$1,005,827.50  
Computed on full value of the interest or property conveyed.

**GRANT DEED**

FOR VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, EOP-Peninsula Office Park L.L.C., a Delaware limited liability company, formerly known as Peninsula Office Park LLC, a Delaware limited liability company, formerly known as Peninsula Office Park Associates, L.P. a California limited partnership, formerly known as Peninsula Office Park, a California limited partnership ("Grantor"), does hereby GRANT, SELL AND CONVEY to Hudson Peninsula Office Park, LLC, a Delaware limited liability company ("Grantee"), all of that certain real property in the County of San Mateo, State of California, as more particularly described in Exhibit A attached hereto and incorporated herein by this reference and made a part hereof (the "Land"), together with any and all buildings and structures located thereon and the associated parking and landscaped areas and all other improvements located thereon (collectively, the "Improvements"), all of Grantor's right, title and interest in and to all rights, privileges, easements, and appurtenances benefiting the Land and/or the Improvements, including without limitation all rights as declarant, if any, under any easements, covenants, conditions and restrictions, to the extent belonging or appertaining to the Land or such structures and improvements (together with the Land and the Improvements, the "Property").

This conveyance is made and accepted subject to all real property taxes and assessments not due and payable, unrecorded leases, all matters of record as of the date hereof and all matters that would be reflected on an accurate survey or shown by a physical inspection of the Property, as of the date hereof.

Mail tax statements as directed above

[Peninsula Office Park]  
010396-1455-14908-ACTIVE.16934378

NCS - 650881

This document is dated April 1, 2015.

"GRANTOR"

**EOP-PENINSULA OFFICE PARK L.L.C.**

By:



Name: Matthew Koritz

Title: Vice President – Legal, General Counsel

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

STATE OF ILLINOIS )  
 )  
COUNTY OF COOK )

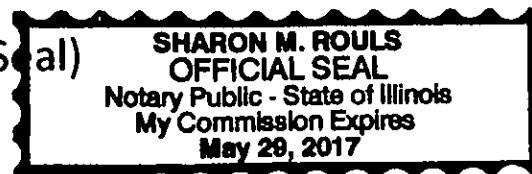
On 2/25, 2015, before me, Sharon M. Rouls, a Notary Public, personally appeared Matthew Koritz, who proved to me on the basis of satisfactory evidence to be the persons whose name is subscribed to the within instrument, and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or the entity upon behalf of which the person acted, executed the instrument.

WITNESS my hand and official seal.

Signature



(Seal)



**EXHIBIT A**

**Legal Description**

PARCEL A:

PARCEL ONE:

Lot 1, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL TWO:

An undivided 1/8 interest in Parcel 'A' Common Area, as designated on the Map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL B:

PARCEL ONE:

Lot 2, as shown on that certain map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL TWO:

An undivided 1/8 interest in Parcel 'A' Common Area as shown on that certain map entitled "PENINSULA OFFICE PARK CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California on October 2, 1972 in Book 78 of Maps, at pages 32 and 33, San Mateo County Records.

PARCEL C:

PARCEL ONE:

Lot 6, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL TWO:

An undivided 1/8 interest in Parcel 'A' Common Area, as designated on the map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which

map was filed in the office of the Recorder of the County of San Mateo, State of California on October 2, 1972 in Book 78 of Maps at Pages 32 and 33.

PARCEL D:

PARCEL ONE:

Lot 4, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL TWO:

An undivided 1/8 interest in Parcel 'A' Common Area, as designated on the map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL E:

PARCEL ONE:

A portion of Parcels 1 and 2, as said parcels are shown on that certain map entitled "PARCEL MAP NO. 154", filed in the office of the County Recorder of San Mateo County, State of California, on December 22, 1976 in Book 34 of Parcel Maps at page(s) 34, and being more particularly described as follows:

BEGINNING at the most Southerly corner of said Parcel 2 and from which point a radial line bears North 56° 38' 58" East; thence along the Westerly and Northerly line of said Parcel 2 the following ten courses;

- 1) Northerly along a curve to the right having a radius of 167.50 feet, through a central angle of 29° 17' 00", an arc length of 85.61 feet;
- 2) North 4° 04' 02" West, a distance of 148.37 feet to the beginning of a tangent curve to the right;
- 3) Along said curve having a radius of 192.50 feet, through a central angle of 7° 05' 13", an arc length of 23.81 feet;
- 4) North 3° 01' 11" East, a distance of 313.89 feet;
- 5) North 4° 17' 34" East, a distance of 270.07 feet;
- 6) North 3° 01' 11" East, a distance of 38.15 feet to the beginning of a tangent curve to the right;

7) Along said curve having a radius of 161.50 feet, through a central angle of  $54^{\circ} 09' 50''$ , an arc length of 152.67 feet;

8) North  $57^{\circ} 11' 01''$  East, a distance of 7.00 feet to the beginning of a tangent curve to the right;

9) Along said curve having a radius of 161.50 feet, through a central angle of  $58^{\circ} 51' 32''$ , an arc length to 165.91 feet to a point of reverse curvature;

10) Along said curve having a curve having a radius of 597.50 feet, through a central angle of  $12^{\circ} 55' 09''$ , an arc length of 134.73 feet to the most Northeasterly corner of said Parcel 2 and the most Northwesterly corner of said Parcel 1; thence leaving said Parcel 2 line and along the Northerly line of said Parcel 1 said curve having a radius of 597.50 feet, through a central angle of  $1^{\circ} 11' 55''$ , an arc length of 12.50 feet; thence leaving said Parcel 1 line South  $46^{\circ} 48' 30''$  West, a distance of 92.39 feet; thence South  $43^{\circ} 11' 30''$  East, a distance of 33.00 feet; thence South  $46^{\circ} 48' 30''$  West, a distance of 394.53 feet; thence South  $1^{\circ} 58' 13''$  West, a distance of 226.01 feet; thence South  $43^{\circ} 11' 30''$  West, a distance of 86.14 feet; thence South  $28^{\circ} 47' 31''$  East, a distance of 195.81 feet to the Southerly line of said Parcel 2; thence along said Parcel 2 line South  $74^{\circ} 33' 08''$  West, a distance of 87.00 feet; thence continuing along said line South  $40^{\circ} 38' 08''$  West, a distance of 164.3 Being the property described as "Proposed Parcel Two" in that certain Approval of Lot Line Adjustment, recorded May 23, 1997, Document No. 97061640.

PARCEL TWO:

An undivided 1/16th interest in Parcel 'A' Common Area, as designated on the Map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo County, State of California on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL F:

PARCEL ONE:

A portion of Parcels 1 and 2, as said parcels are shown on that certain map entitled "PARCEL MAP NO. 154", filed in the office of the County Recorder of San Mateo County, State of California, on December 22, 1976 in Book 34 of Parcel Maps at page(s) 34, and being more particularly described as follows:

BEGINNING at the most Northerly corner of said Parcel 1 from which point a radial line bears North  $13^{\circ} 07' 24''$  East; thence along the Northerly, Easterly, and Southerly line of said Parcel 1 of the following seven courses;

- 1) Easterly along a curve to the left having a radius of 597.50 feet, through a central angle of  $1^{\circ} 11' 55''$ , an arc length of 12.50 feet to the true point of beginning.
- 2) Continuing along said curve to the left having a radius of 597.50 feet, through a central angle

of  $5^{\circ} 30' 50''$ , an arc length of 57.50 feet;

3) South  $42^{\circ} 57' 37''$  East, a distance of 220.08 feet to the beginning of a tangent curve to the right;

4) Along said curve having a radius of 80.00 feet, through a central angle of  $46^{\circ} 35' 20''$ , an arc length of 65.05 feet;

5) South  $3^{\circ} 37' 43''$  West, a distance of 142.48 feet to the beginning of a tangent curve to the right;

6) Along said curve having a radius of 80.00 feet, through a central angle of  $39^{\circ} 12' 37''$ , an arc length of 54.75 feet;

7) South  $42^{\circ} 50' 20''$  West, a distance of 208.30 feet to the most Southerly corner of said Parcel 1 and the most Southerly corner of said Parcel 2; thence leaving said Parcel 1 line and along the Southerly line of said Parcel 2 the following four courses;

1) South  $42^{\circ} 50' 20''$  West, a distance of 7.36 feet;

2) South  $3^{\circ} 22' 21''$  West, a distance of 78.64 feet;

3) South  $31^{\circ} 14' 08''$  West, a distance of 196.19 feet;

4) North  $86^{\circ} 28' 52''$  West, a distance of 132.00 feet; thence leaving said Parcel 2 line North  $28^{\circ} 47' 31''$  West, a distance of 195.81 feet; thence North  $43^{\circ} 11' 30''$  West, a distance of 86.14 feet; thence North  $1^{\circ} 58' 13''$  East, a distance of 226.01 feet; thence North  $46^{\circ} 48' 30''$  East, a distance of 394.54 feet; thence North  $43^{\circ} 11' 30''$  West, a distance of 33.00 feet; thence North  $46^{\circ} 48' 30''$  East, a distance of 92.39 feet to the true point of beginning.

Being the property described as "Proposed Parcel One" in that certain Approval of Lot Line Adjustment recorded May 23, 1997, Document No. 97061640.

PARCEL G:

PARCEL ONE:

Lot 5, as shown on that certain map entitled "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", filed in the office of the County Recorder of San Mateo County, State of California, on October 2, 1972 in Book 78 of Maps at pages 32 and 33.

PARCEL TWO:

An undivided 1/8 interest in Parcel 'A' Common Area as designated on the map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California on

October 2, 1972 in Book 78 of Maps at Pages 32 and 33.

PARCEL THREE:

An easement for parking purposes, being a strip of land over and across Lot 6, as said Lot is shown on the map entitled, "PENINSULA OFFICE PARK, CITY OF SAN MATEO, SAN MATEO COUNTY, CALIFORNIA", which map was filed in the office of the Recorder of the County of San Mateo, State of California in Book 78 of Maps at pages 32 and 33, said strip of land being more particularly described as follows:

BEGINNING at the Southwesterly corner of Lot 5 as shown on the aforesaid map; thence North 45° 00' 00" East 313.62 feet; thence, along the arc of a curve to the left, having a radius of 82.00 feet, through a central angle of 22° 03' 15" an arc distance of 31.56 feet; thence South 45° 00' 00" West 345.99 feet; thence South 59° 48' 02" East 6.21 feet to the point of beginning.

APN: APN: 041-521-010 (Parcel A), 041-521-020 (Parcel B), 041-522-020 (Parcel C), 041-521-040 (Parcel D), 041-522-070 (Parcel E), 041-522-080 (Parcel F), 041-522-010 (Parcel G)

JPN No.: 041-052-521-01A (Parcel A), 041-052-521-02A (Parcel B), 041-052-522-02A (Parcel C), 041-052-521-04A (Parcel D), 041-052-522-04A (Parcel E), 041-052-522-04.01A (Parcel F), 041-052-522-01A (Parcel G)

## **Appendix D**

# **Regulatory Records Documentation**

**Peninsula Office Park**

2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo, CA 94403

Inquiry Number: 5278277.2s  
May 02, 2018

## The EDR Radius Map™ Report with GeoCheck®



6 Armstrong Road, 4th floor  
Shelton, CT 06484  
Toll Free: 800.352.0050  
[www.edrnet.com](http://www.edrnet.com)

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***Thank you for your business.***  
 Please contact EDR at 1-800-352-0050  
 with any questions or comments.

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## EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E 2247-16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E 1528-14) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

### TARGET PROPERTY INFORMATION

#### ADDRESS

2655, 2755, 2800, 2929, 2955, & 2988 CAMPUS DRIVE  
SAN MATEO, CA 94403

#### COORDINATES

Latitude (North): 37.5365510 - 37° 32' 11.58"  
Longitude (West): 122.3264020 - 122° 19' 35.04"  
Universal Tranverse Mercator: Zone 10  
UTM X (Meters): 559512.2  
UTM Y (Meters): 4154405.0  
Elevation: 373 ft. above sea level

### USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 5640626 SAN MATEO, CA  
Version Date: 2012

### AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 20140608  
Source: USDA

**MAPPED SITES SUMMARY**

**Target Property Address:**  
 2655, 2755, 2800, 2929, 2955, & 2988 CAMPUS DRIVE  
 SAN MATEO, CA 94403

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
A1	EOP- PENINSULA OFFIC	2755 CAMPUS DR	HAZNET		TP
A2	PENISULA OFFICE PARK	2600 - 2988 CAMPUS D	HAZNET		TP
A3	EQUITY OFFICE MANAGE	2988 CAMPUS DR	HAZNET		TP
A4	EQUITY OFFICE INC	2755 CAMPUS DR	HAZNET		TP
A5	EOP - PENINSULA OFFI	2955 CAMPUS DRIVE	EMI		TP
A6	EQUITY OFFICE PROPER	2988 CAMPUS DR	HAZNET		TP
A7	EOP-PENINSULA OFFICE	2655 CAMPUS DR	HAZNET		TP
A8	VERIZON WIRELESS HWY	2929 CAMPUS	San Mateo Co. BI		TP
A9	PENINSULA OFFICE PAR	2988 CAMPUS DR	HAZNET		TP
A10	EQUITY OFFICE INC	2755 CAMPUS DR	HAZNET		TP
A11	EOP-PENINSULA OFFICE	2929 CAMPUS DR	HAZNET		TP
A12	EQUITY OFFICE PROPER	2955 CAMPUS DRIVE	EMI		TP
A13	EOP-PENINSULA OFFICE	2655 CAMPUS DR	HAZNET		TP
A14	EOP-PENINSULA OFFICE	2929 CAMPUS DR	HAZNET		TP
A15	VERIZON WIRELESS HWY	2929 CAMPUS DR	FINDS		TP
A16	EQUITY OFFICE	2955 CAMPUS DR STE B	FINDS		TP
A17	EQUITY OFFICE	2800 CAMPUS DR	HAZNET		TP
A18	CHEMCRETE INTERNATIO	2755 CAMPUS SUITE 12	RCRA-SQG, FINDS, ECHO		TP
A19	EOP - PENINSULA OFFI	2955 CAMPUS DRIVE	FINDS		TP
A20	EQUITY OFFICE CORP	2800 CAMPUS DR	HAZNET		TP
A21	HUDSON PACIFIC PROPE	2955 CAMPUS	San Mateo Co. BI		TP
B22	USPS INFORMATION SVC	2700 CAMPUS DR	UST	Lower	91, 0.017, NE
B23	USPS INFORMATION SVC	2700 CAMPUS	San Mateo Co. BI	Lower	91, 0.017, NE
B24	USPS INFORMATION SVC	2700 CAMPUS DR	AST	Lower	91, 0.017, NE
C25	CHARMERS	3176 CAMPUS	San Mateo Co. BI	Higher	176, 0.033, SSW
C26	PENINSULA PRESS	3168 CAMPUS	San Mateo Co. BI	Higher	176, 0.033, SSW
C27	PG&E: HILLSDALE SUBS	ACROSS FROM 800 26TH	San Mateo Co. BI	Lower	262, 0.050, ENE
C28	HOLIDAY CLEANERS	3166 CAMPUS DRIVE	RCRA-SQG, FINDS, ECHO, San Mateo Co. BI,...	Higher	308, 0.058, SSW
C29	SPRINT NEXTEL SF13XC	3130 CAMPUS	San Mateo Co. BI	Lower	387, 0.073, SSW
D30	SHELL	1400 WEST HILLSDALE	RGA LUST	Lower	541, 0.102, SSW
D31	COLLEGE PLAZA SHELL	1400 W HILLSDALE BLV	UST	Lower	541, 0.102, SSW
D32	COLLEGE PLAZA SHELL	1400 WEST HILLSDALE	RGA LUST	Lower	541, 0.102, SSW
D33	SHELL	1400 WEST HILLSDALE	LUST	Lower	541, 0.102, SSW
D34	COLLEGE SHELL AUTO C	1400 HILLSDALE	LUST, San Mateo Co. BI	Lower	541, 0.102, SSW
D35	SHELL OIL STATION	1400 W HILLSDALE BLV	LUST, SWEEPS UST, HIST UST, CA FID UST	Lower	541, 0.102, SSW
D36	HILLSDALE / CAMPUS	1400 W HILLSDALE BLV	HIST UST	Lower	541, 0.102, SSW
D37	COLLEGE PLAZA SHELL	1400 HILLSDALE	San Mateo Co. BI, HIST CORTESE	Lower	541, 0.102, SSW
D38	SHELL	1400 W HILLSDALE BLV	RGA LUST	Lower	541, 0.102, SSW
D39	COLLEGE PLAZA SHELL	1400 W HILLSDALE BLV	EDR Hist Auto	Lower	541, 0.102, SSW

**MAPPED SITES SUMMARY**

**Target Property Address:**  
 2655, 2755, 2800, 2929, 2955, & 2988 CAMPUS DRIVE  
 SAN MATEO, CA 94403

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
D40	SHELL	1400 HILLSDALE	RGA LUST	Lower	541, 0.102, SSW
D41	SHELL	1400 HILLSDALE BLVD	RGA LUST	Lower	541, 0.102, SSW
D42	CELIA'S MEXICAN REST	3190 CAMPUS	San Mateo Co. BI	Higher	551, 0.104, SSW
D43	CHEVRON 9-5716	1350 HILLSDALE BLVD	RGA LUST	Lower	628, 0.119, South
D44	RITE AID #5903	1320 HILLSDALE	San Mateo Co. BI	Lower	628, 0.119, South
D45	CHEVRON STATION #571	1350 W HILLSDALE BLV	LUST, SWEEPS UST, HIST UST	Lower	628, 0.119, South
D46	CHEVRON USA INC SERV	1350 W HILLSDALE BLV	RCRA NonGen / NLR, FINDS, ECHO	Lower	628, 0.119, South
D47	RITE AID #5903	1320 W HILLSDALE BLV	RCRA-CESQG, FINDS, ECHO	Lower	628, 0.119, South
D48	MCDONALDS	1324 HILLSDALE	San Mateo Co. BI, HAZNET	Lower	628, 0.119, South
D49	CHEVRON 5716	1350 HILLSDALE BLVD	RGA LUST	Lower	628, 0.119, South
D50	CHEVRON	1350 HILLSDALE	LUST, San Mateo Co. BI, HIST CORTESE	Lower	628, 0.119, South
D51	CHEVRON 9-5716, FORM	1350 HILLSDALE	RGA LUST	Lower	628, 0.119, South
D52	CHEVRON 9-5716, FORM	1350 WEST HILLSDALE	RGA LUST	Lower	628, 0.119, South
D53	CHEVRON	1350 HILLSDALE BLVD	RGA LUST	Lower	628, 0.119, South
D54	LAURELWOOD CHEVRON	1350 W HILLSDALE	EDR Hist Auto	Lower	628, 0.119, South
D55	CHEVRON 9-5716, FORM	1350 WEST HILLSDALE	LUST	Lower	628, 0.119, South
E56	CASABLANCA VIDEO	1238 W HILLSDALE BLV	RCRA-SQG, FINDS, ECHO	Lower	802, 0.152, South
E57	LP'S TOWN & COUNTRY	1234 HILLSDALE	San Mateo Co. BI	Lower	809, 0.153, South
E58	TOWN AND COUNTRY CLE	1234 W HILLSDALE BLV	DRYCLEANERS	Lower	809, 0.153, South
E59	TOWN & COUNTRY CLEAN	1234 W HILLSDALE	EDR Hist Cleaner	Lower	809, 0.153, South
E60	TOWN & COUNTRY CLEAN	1234 W HILLSDALE BLV	RCRA-SQG, FINDS, ECHO, San Mateo Co. BI,...	Lower	809, 0.153, South
E61	WELLMORE ENTERPRISES	1232 W HILLSDALE BLV	EDR Hist Cleaner	Lower	813, 0.154, South
E62	PIAZZAS FINE FOODS	1218 HILLSDALE	San Mateo Co. BI	Lower	824, 0.156, South
E63	AT & T MOBILITY	1206 HILLSDALE	San Mateo Co. BI	Lower	825, 0.156, SSE
F64	VISA INTERNATIONAL	3000 CLEARVIEW	San Mateo Co. BI	Higher	910, 0.172, WSW
F65	INTERLAND EXECUTIVE	3000 CLEARVIEW WAY	HIST UST	Higher	910, 0.172, WSW
F66	INTERLAND EXECUTIVE	3000 CLEARVIEW WAY	SWEEPS UST, CA FID UST	Higher	910, 0.172, WSW
G67	PENINSULA GOLF AND C	701 MADERA	LUST, San Mateo Co. BI	Lower	1961, 0.371, NE
G68	PENNINSULA GOLF & CO	701 MADERA DR	RGA LUST	Lower	1961, 0.371, NE
G69	PENINSULA GOLF & COU	701 MADERA	LUST, San Mateo Co. BI, HIST CORTESE	Lower	1961, 0.371, NE
G70	PENINSULA GOLF & COU	701 MADERA	RGA LUST	Lower	1961, 0.371, NE
G71	PENINSULA GOLF & COU	701 MADERA	RGA LUST	Lower	1961, 0.371, NE
G72	PENINSULA GOLF & COU	701 MADERA DR	RGA LUST	Lower	1961, 0.371, NE
G73	PENNINSULA GOLF AND	701 MADERA DR	RGA LUST	Lower	1961, 0.371, NE
H74	COLLEGE OF SAN MATEO	1700 W HILLSDALE BLV	LUST, NPDES	Higher	2479, 0.470, WSW
H75	COLLEGE OF SAN MATEO	1700 WEST HILLSDALE	LUST	Higher	2479, 0.470, WSW
H76	COLLEGE OF SAN MATEO	1700 HILLSDALE	RGA LUST	Higher	2479, 0.470, WSW
H77	COLLEGE OF SAN MATEO	1700 WEST HILLSDALE	RGA LUST	Higher	2479, 0.470, WSW
H78	COLLEGE OF SAN MATEO	1700 WEST HILLSDALE	RGA LUST	Higher	2479, 0.470, WSW

**MAPPED SITES SUMMARY**

**Target Property Address:**  
 2655, 2755, 2800, 2929, 2955, & 2988 CAMPUS DRIVE  
 SAN MATEO, CA 94403

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
H79	COLLEGE OF SAN MATEO	1700 HILLSDALE W	RGA LUST	Higher	2479, 0.470, WSW
H80	COLLEGE OF SAN MATEO	1700 HILLSDALE	LUST, San Mateo Co. BI, HIST CORTESE	Higher	2479, 0.470, WSW
H81	COLLEGE OF SAN MATEO	1700 HILLSDALE BLVD	RGA LUST	Higher	2479, 0.470, WSW
82	SEQUOIA HOSPITAL	170 ALAMEDA DE LAS P	RGA LUST	Lower	2533, 0.480, North
83	HILLSDALE HIGH SCHOOL	3115 DEL MONTE STREE	ENVIROSTOR, SCH	Lower	2653, 0.502, ESE
84	ARAGON HIGH SCHOOL	900 ALAMEDA DE LAS P	ENVIROSTOR, SCH	Lower	4505, 0.853, North
85	ARCO SERVICE STATION	3600 ALAMEDA DE LAS	Notify 65	Lower	5027, 0.952, ESE
86	ONE HR. DRY CLG. MAR	111 WEST 25TH AVENUE	ENVIROSTOR	Lower	5143, 0.974, ENE

## EXECUTIVE SUMMARY

Facility Id: 41720086  
 Status: Refer: Other Agency

### ***State and tribal leaking storage tank lists***

LUST: Leaking Underground Storage Tank (LUST) Sites included in GeoTracker. GeoTracker is the Water Boards data management system for sites that impact, or have the potential to impact, water quality in California, with emphasis on groundwater.

A review of the LUST list, as provided by EDR, has revealed that there are 11 LUST sites within approximately 0.5 miles of the target property.

<b>Equal/Higher Elevation</b>	<b>Address</b>	<b>Direction / Distance</b>	<b>Map ID</b>	<b>Page</b>
<b>COLLEGE OF SAN MATEO</b>	<b>1700 W HILLSDALE BLV</b>	<b>WSW 1/4 - 1/2 (0.470 mi.)</b>	<b>H74</b>	<b>78</b>
Database: SAN MATEO CO. LUST, Date of Government Version: 01/22/2018 Facility Id: 110100 Facility Status: 9- Case Closed Global ID: T0608100823				
COLLEGE OF SAN MATEO	1700 WEST HILLSDALE	WSW 1/4 - 1/2 (0.470 mi.)	H75	81
Database: LUST, Date of Government Version: 03/12/2018 Status: Completed - Case Closed Global Id: T0608100823				
<b>COLLEGE OF SAN MATEO</b>	<b>1700 HILLSDALE</b>	<b>WSW 1/4 - 1/2 (0.470 mi.)</b>	<b>H80</b>	<b>83</b>
Database: LUST REG 2, Date of Government Version: 09/30/2004 Facility Status: Case Closed date9: 12/7/2000				
<b>Lower Elevation</b>	<b>Address</b>	<b>Direction / Distance</b>	<b>Map ID</b>	<b>Page</b>
<b>SHELL</b>	<b>1400 WEST HILLSDALE</b>	<b>SSW 0 - 1/8 (0.102 mi.)</b>	<b>D33</b>	<b>30</b>
Database: LUST, Date of Government Version: 03/12/2018 Status: Completed - Case Closed Global Id: T10000000879 Global Id: T0608100466				
<b>COLLEGE SHELL AUTO C</b>	<b>1400 HILLSDALE</b>	<b>SSW 0 - 1/8 (0.102 mi.)</b>	<b>D34</b>	<b>36</b>
Database: LUST REG 2, Date of Government Version: 09/30/2004 Facility Status: Case Closed date9: 9/18/2001				
<b>SHELL OIL STATION</b>	<b>1400 W HILLSDALE BLV</b>	<b>SSW 0 - 1/8 (0.102 mi.)</b>	<b>D35</b>	<b>37</b>
Database: SAN MATEO CO. LUST, Date of Government Version: 01/22/2018 Facility Id: 110021 Facility Id: 110171 Facility Status: 9- Case Closed Global ID: T0608100466				
<b>CHEVRON STATION #571</b>	<b>1350 W HILLSDALE BLV</b>	<b>S 0 - 1/8 (0.119 mi.)</b>	<b>D45</b>	<b>44</b>
Database: SAN MATEO CO. LUST, Date of Government Version: 01/22/2018 Facility Id: 110097 Facility Status: 9- Case Closed Global ID: T0608100814				
<b>CHEVRON</b>	<b>1350 HILLSDALE</b>	<b>S 0 - 1/8 (0.119 mi.)</b>	<b>D50</b>	<b>56</b>
Database: LUST REG 2, Date of Government Version: 09/30/2004				

# OVERVIEW MAP - 5278277.2S



Target Property

Sites at elevations higher than or equal to the target property

Sites at elevations lower than the target property

Manufactured Gas Plants

National Priority List Sites

Dept. Defense Sites

Indian Reservations BIA

Power transmission lines

100-year flood zone

500-year flood zone

National Wetland Inventory

State Wetlands

Upgradient Area

Areas of Concern

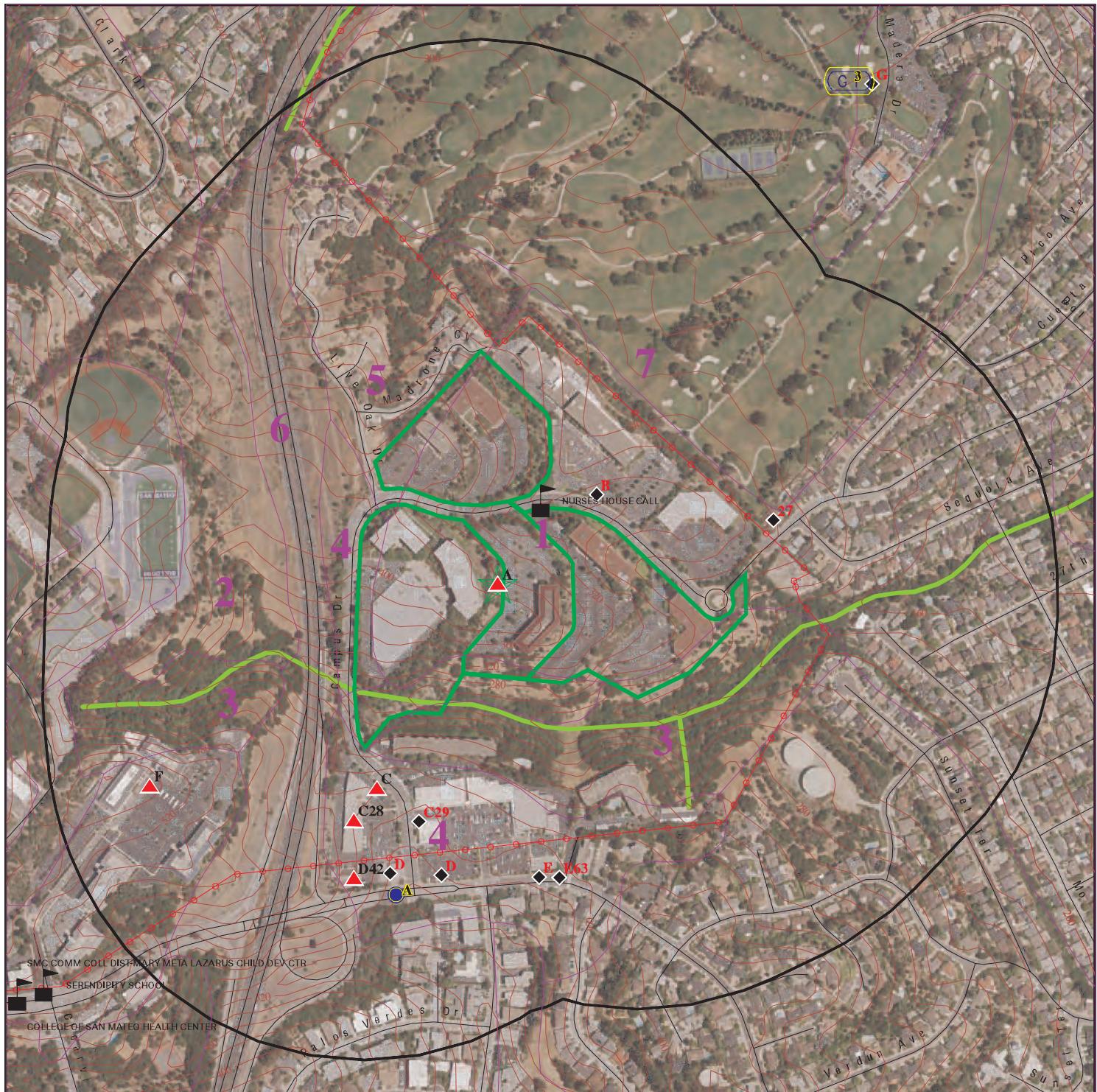


This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

**SITE NAME:** Peninsula Office Park  
**ADDRESS:** 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
 San Mateo CA 94403  
**LAT/LONG:** 37.536551 / 122.326402

**CLIENT:** Targus Associates  
**CONTACT:** Kate Finley  
**INQUIRY #:** 5278277.2s  
**DATE:** May 02, 2018 7:42 am

# DETAIL MAP - 5278277.2S



Target Property

Sites at elevations higher than or equal to the target property

Sites at elevations lower than the target property

Manufactured Gas Plants

Sensitive Receptors

National Priority List Sites

Dept. Defense Sites

Indian Reservations BIA

Power transmission lines

100-year flood zone

500-year flood zone

National Wetland Inventory

State Wetlands

Areas of Concern



This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

**SITE NAME:** Peninsula Office Park  
**ADDRESS:** 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
 San Mateo CA 94403  
**LAT/LONG:** 37.536551 / 122.326402

**CLIENT:** Targus Associates  
**CONTACT:** Kate Finley  
**INQUIRY #:** 5278277.2s  
**DATE:** May 02, 2018 7:43 am

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
<b><u>STANDARD ENVIRONMENTAL RECORDS</u></b>								
<b><i>Federal NPL site list</i></b>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	TP		NR	NR	NR	NR	NR	0
<b><i>Federal Delisted NPL site list</i></b>								
Delisted NPL	1.000		0	0	0	0	NR	0
<b><i>Federal CERCLIS list</i></b>								
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
SEMS	0.500		0	0	0	NR	NR	0
<b><i>Federal CERCLIS NFRAP site list</i></b>								
SEMS-ARCHIVE	0.500		0	0	0	NR	NR	0
<b><i>Federal RCRA CORRACTS facilities list</i></b>								
CORRACTS	1.000		0	0	0	0	NR	0
<b><i>Federal RCRA non-CORRACTS TSD facilities list</i></b>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<b><i>Federal RCRA generators list</i></b>								
RCRA-LQG	0.250		0	0	NR	NR	NR	0
RCRA-SQG	0.250	1	1	2	NR	NR	NR	4
RCRA-CESQG	0.250		1	0	NR	NR	NR	1
<b><i>Federal institutional controls / engineering controls registries</i></b>								
LUCIS	0.500		0	0	0	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
<b><i>Federal ERNS list</i></b>								
ERNS	TP		NR	NR	NR	NR	NR	0
<b><i>State- and tribal - equivalent NPL</i></b>								
RESPONSE	1.000		0	0	0	0	NR	0
<b><i>State- and tribal - equivalent CERCLIS</i></b>								
ENVIROSTOR	1.000		0	0	0	3	NR	3
<b><i>State and tribal landfill and/or solid waste disposal site lists</i></b>								
SWF/LF	0.500		0	0	0	NR	NR	0
<b><i>State and tribal leaking storage tank lists</i></b>								
LUST	0.500		6	0	5	NR	NR	11

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
INDIAN LUST	0.500		0	0	0	NR	NR	0
SLIC	0.500		0	0	0	NR	NR	0
<b><i>State and tribal registered storage tank lists</i></b>								
FEMA UST	0.250		0	0	NR	NR	NR	0
UST	0.250		2	0	NR	NR	NR	2
AST	0.250		1	0	NR	NR	NR	1
INDIAN UST	0.250		0	0	NR	NR	NR	0
<b><i>State and tribal voluntary cleanup sites</i></b>								
INDIAN VCP	0.500		0	0	0	NR	NR	0
VCP	0.500		0	0	0	NR	NR	0
<b><i>State and tribal Brownfields sites</i></b>								
BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b><u>ADDITIONAL ENVIRONMENTAL RECORDS</u></b>								
<b><i>Local Brownfield lists</i></b>								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
<b><i>Local Lists of Landfill / Solid Waste Disposal Sites</i></b>								
WMUDS/SWAT	0.500		0	0	0	NR	NR	0
SWRCY	0.500		0	0	0	NR	NR	0
HAULERS	TP		NR	NR	NR	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
IHS OPEN DUMPS	0.500		0	0	0	NR	NR	0
<b><i>Local Lists of Hazardous waste / Contaminated Sites</i></b>								
US HIST CDL	TP		NR	NR	NR	NR	NR	0
HIST Cal-Sites	1.000		0	0	0	0	NR	0
SCH	0.250		0	0	NR	NR	NR	0
CDL	TP		NR	NR	NR	NR	NR	0
Toxic Pits	1.000		0	0	0	0	NR	0
US CDL	TP		NR	NR	NR	NR	NR	0
<b><i>Local Lists of Registered Storage Tanks</i></b>								
SWEEPS UST	0.250		2	1	NR	NR	NR	3
HIST UST	0.250		3	1	NR	NR	NR	4
CA FID UST	0.250		1	1	NR	NR	NR	2
<b><i>Local Land Records</i></b>								
LIENS	TP		NR	NR	NR	NR	NR	0
LIENS 2	TP		NR	NR	NR	NR	NR	0
DEED	0.500		0	0	0	NR	NR	0
<b><i>Records of Emergency Release Reports</i></b>								
HMIRS	TP		NR	NR	NR	NR	NR	0

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
CHMIRS	TP		NR	NR	NR	NR	NR	0
LDS	TP		NR	NR	NR	NR	NR	0
MCS	TP		NR	NR	NR	NR	NR	0
<b>Other Ascertainable Records</b>								
RCRA NonGen / NLR	0.250		1	0	NR	NR	NR	1
FUDS	1.000		0	0	0	0	NR	0
DOD	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
US FIN ASSUR	TP		NR	NR	NR	NR	NR	0
EPA WATCH LIST	TP		NR	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0
ROD	1.000		0	0	0	0	NR	0
RMP	TP		NR	NR	NR	NR	NR	0
RAATS	TP		NR	NR	NR	NR	NR	0
PRP	TP		NR	NR	NR	NR	NR	0
PADS	TP		NR	NR	NR	NR	NR	0
ICIS	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
COAL ASH DOE	TP		NR	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
PCB TRANSFORMER	TP		NR	NR	NR	NR	NR	0
RADINFO	TP		NR	NR	NR	NR	NR	0
HIST FTTS	TP		NR	NR	NR	NR	NR	0
DOT OPS	TP		NR	NR	NR	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
FUSRAP	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
LEAD SMELTERS	TP		NR	NR	NR	NR	NR	0
US AIRS	TP		NR	NR	NR	NR	NR	0
US MINES	0.250		0	0	NR	NR	NR	0
ABANDONED MINES	TP		NR	NR	NR	NR	NR	0
FINDS	TP	4	NR	NR	NR	NR	NR	4
UXO	1.000		0	0	0	0	NR	0
DOCKET HWC	TP		NR	NR	NR	NR	NR	0
ECHO	TP	1	NR	NR	NR	NR	NR	1
FUELS PROGRAM	0.250		0	0	NR	NR	NR	0
CA BOND EXP. PLAN	1.000		0	0	0	0	NR	0
San Mateo Co. BI	0.250	2	12	5	NR	NR	NR	19
Cortese	0.500		0	0	0	NR	NR	0
CUPA Listings	0.250		0	0	NR	NR	NR	0
DRYCLEANERS	0.250		1	2	NR	NR	NR	3
EMI	TP	2	NR	NR	NR	NR	NR	2
ENF	TP		NR	NR	NR	NR	NR	0
Financial Assurance	TP		NR	NR	NR	NR	NR	0
HAZNET	TP	13	NR	NR	NR	NR	NR	13

## MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
ICE	TP	NR	NR	NR	NR	NR	NR	0
HIST CORTESE	0.500	2	0	2	NR	NR	NR	4
HWP	1.000	0	0	0	0	NR	NR	0
HWT	0.250	0	0	NR	NR	NR	NR	0
MINES	TP	NR	NR	NR	NR	NR	NR	0
MWMP	0.250	0	0	NR	NR	NR	NR	0
NPDES	TP	NR	NR	NR	NR	NR	NR	0
PEST LIC	TP	NR	NR	NR	NR	NR	NR	0
PROC	0.500	0	0	0	NR	NR	NR	0
Notify 65	1.000	0	0	0	1	NR	NR	1
UIC	TP	NR	NR	NR	NR	NR	NR	0
WASTEWATER PITS	0.500	0	0	0	NR	NR	NR	0
WDS	TP	NR	NR	NR	NR	NR	NR	0
WIP	0.250	0	0	NR	NR	NR	NR	0

### EDR HIGH RISK HISTORICAL RECORDS

#### ***EDR Exclusive Records***

EDR MGP	1.000	0	0	0	0	NR	0
EDR Hist Auto	0.250	2	0	NR	NR	NR	2
EDR Hist Cleaner	0.250	0	2	NR	NR	NR	2

### EDR RECOVERED GOVERNMENT ARCHIVES

#### ***Exclusive Recovered Govt. Archives***

RGA LF	0.500	0	0	0	NR	NR	0	
RGA LUST	0.500	10	0	11	NR	NR	21	
- Totals --		23	45	14	18	4	0	104

### NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

		MAP FINDINGS	
Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number
A1 Target Property	EOP- PENINSULA OFFICE PARK, LLC 2755 CAMPUS DR SAN MATEO, CA 94403	HAZNET	S118208587 N/A
Actual: 373 ft.	<p><b>Site 1 of 21 in cluster A</b></p> <p>HAZNET:  envid: S118208587  Year: 2014  GEPAID: CAC002768956  Contact: MICHELLE HERNANDEZ  Telephone: 6503723558  Mailing Name: Not reported  Mailing Address: 2655 CAMPUS DR STE 100  Mailing City,St,Zip: SAN MATEO, CA 944032520  Gen County: San Mateo  TSD EPA ID: CAD982042475  TSD County: Solano  Waste Category: Asbestos containing waste  Disposal Method: Landfill Or Surface Impoundment That Will Be Closed As Landfill( To Include On-Site Treatment And/Or Stabilization)  Tons: 0.8  Cat Decode: Not reported  Method Decode: Not reported  Facility County: San Mateo</p>		
A2 Target Property	PENISULA OFFICE PARK 2600 - 2988 CAMPUS DR. SAN MATEO, CA 94403	HAZNET	S112858058 N/A
Actual: 373 ft.	<p><b>Site 2 of 21 in cluster A</b></p> <p>HAZNET:  envid: S112858058  Year: 1994  GEPAID: CAC000979488  Contact: WM. OLSON &amp; ASSOC.  Telephone: 0000000000  Mailing Name: Not reported  Mailing Address: 2929 CAMPUS DR.  Mailing City,St,Zip: SAN MATEO, CA 944030000  Gen County: Not reported  TSD EPA ID: AZD983476680  TSD County: Not reported  Waste Category: Polychlorinated biphenyls and material containing PCBs  Disposal Method: Invalid Code  Tons: 1.2000  Cat Decode: Not reported  Method Decode: Not reported  Facility County: San Mateo</p>		

Map ID	Direction	Distance	Elevation	Site	MAP FINDINGS	Database(s)	EDR ID Number	EPA ID Number
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A3 EQUITY OFFICE MANAGEMENT LLC  
Target 2988 CAMPUS DR  
Property SAN MATEO, CA 94403

HAZNET S112983760  
N/A

Site 3 of 21 in cluster A

**Actual:** HAZNET:  
**373 ft.**

envid:	S112983760
Year:	2011
GEPAID:	CAC002663198
Contact:	JIM SOUTTER
Telephone:	6503723553
Mailing Name:	Not reported
Mailing Address:	2655 CAMPUS DR STE 100
Mailing City,St,Zip:	SAN MATEO, CA 944032520
Gen County:	Not reported
TSD EPA ID:	CAD028409019
TSD County:	Not reported
Waste Category:	Unspecified oil-containing waste
Disposal Method:	Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery (H010-H129) Or (H131-H135)
Tons:	0.11
Cat Decode:	Not reported
Method Decode:	Not reported
Facility County:	San Mateo

A4 EQUITY OFFICE INC  
Target 2755 CAMPUS DR  
Property SAN MATEO, CA 94403

HAZNET S112964386  
N/A

Site 4 of 21 in cluster A

**Actual:** HAZNET:  
**373 ft.**

envid:	S112964386
Year:	2007
GEPAID:	CAC002621279
Contact:	JAMES SOTTER
Telephone:	4084874128
Mailing Name:	Not reported
Mailing Address:	1740 TECHNOLOGY DR STE 150
Mailing City,St,Zip:	SAN JOSE, CA 951101348
Gen County:	Not reported
TSD EPA ID:	CAD028409019
TSD County:	Not reported
Waste Category:	Asbestos containing waste
Disposal Method:	Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery (H010-H129) Or (H131-H135)
Tons:	0.04
Cat Decode:	Not reported
Method Decode:	Not reported
Facility County:	San Mateo

MAP FINDINGS

Map ID	Site	Database(s)	EDR ID Number
Direction			EPA ID Number
Distance			
Elevation			

**A5**      **EOP - PENINSULA OFFICE PARK, L**  
**Target**    **2955 CAMPUS DRIVE**  
**Property**   **SAN MATEO, CA 94403**

**EMI**   **S113747754**  
**N/A**

**Site 5 of 21 in cluster A**

**Actual:**      **EMI:**  
**373 ft.**

Year:	2010
County Code:	41
Air Basin:	SF
Facility ID:	16529
Air District Name:	BA
SIC Code:	6512
Air District Name:	BAY AREA AQMD
Community Health Air Pollution Info System:	Not reported
Consolidated Emission Reporting Rule:	Not reported
Total Organic Hydrocarbon Gases Tons/Yr:	0
Reactive Organic Gases Tons/Yr:	0
Carbon Monoxide Emissions Tons/Yr:	0.001
NOX - Oxides of Nitrogen Tons/Yr:	3.0000000000000001E-3
SOX - Oxides of Sulphur Tons/Yr:	0
Particulate Matter Tons/Yr:	0
Part. Matter 10 Micrometers and Smllr Tons/Yr:	0
Year:	2011
County Code:	41
Air Basin:	SF
Facility ID:	16529
Air District Name:	BA
SIC Code:	6512
Air District Name:	BAY AREA AQMD
Community Health Air Pollution Info System:	Not reported
Consolidated Emission Reporting Rule:	Not reported
Total Organic Hydrocarbon Gases Tons/Yr:	0
Reactive Organic Gases Tons/Yr:	0
Carbon Monoxide Emissions Tons/Yr:	0.001
NOX - Oxides of Nitrogen Tons/Yr:	0.003
SOX - Oxides of Sulphur Tons/Yr:	0
Particulate Matter Tons/Yr:	0
Part. Matter 10 Micrometers and Smllr Tons/Yr:	0
Year:	2012
County Code:	41
Air Basin:	SF
Facility ID:	16529
Air District Name:	BA
SIC Code:	6512
Air District Name:	BAY AREA AQMD
Community Health Air Pollution Info System:	Not reported
Consolidated Emission Reporting Rule:	Not reported
Total Organic Hydrocarbon Gases Tons/Yr:	0
Reactive Organic Gases Tons/Yr:	0
Carbon Monoxide Emissions Tons/Yr:	0.001
NOX - Oxides of Nitrogen Tons/Yr:	0.003
SOX - Oxides of Sulphur Tons/Yr:	0
Particulate Matter Tons/Yr:	0
Part. Matter 10 Micrometers and Smllr Tons/Yr:	0
Year:	2013

Map ID  
Direction  
Distance  
Elevation

Site

MAP FINDINGS

Database(s) EDR ID Number  
EPA ID Number

**EOP - PENINSULA OFFICE PARK, L (Continued)**

**S113747754**

County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0.001  
NOX - Oxides of Nitrogen Tons/Yr: 0.003  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

**A6** **EQUITY OFFICE PROPERTIES**  
**Target** **2988 CAMPUS DR**  
**Property** **SAN MATEO, CA 94403**

**HAZNET** **S112981466**  
**N/A**

**Site 6 of 21 in cluster A**

**Actual:** HAZNET:  
**373 ft.** envid: S112981466  
Year: 2010  
GEPAID: CAC002648420  
Contact: JIM SOUTTER  
Telephone: 6503723553  
Mailing Name: Not reported  
Mailing Address: 2655 CAMPUS DR STE 100  
Mailing City,St,Zip: SAN MATEO, CA 944032520  
Gen County: Not reported  
TSD EPA ID: CAD028409019  
TSD County: Not reported  
Waste Category: Other organic solids  
Disposal Method: Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery  
(H010-H129) Or (H131-H135)  
Tons: 0.05  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo  
  
envid: S112981466  
Year: 2009  
GEPAID: CAC002648420  
Contact: JIM SOUTTER  
Telephone: 6503723553  
Mailing Name: Not reported  
Mailing Address: 2655 CAMPUS DR STE 100  
Mailing City,St,Zip: SAN MATEO, CA 944032520  
Gen County: Not reported  
TSD EPA ID: CAD028409019  
TSD County: Not reported  
Waste Category: Other organic solids  
Disposal Method: Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery  
(H010-H129) Or (H131-H135)  
Tons: 0.1  
Cat Decode: Not reported

Map ID	MAP FINDINGS	EDR ID Number
Direction		EPA ID Number
Distance		
Elevation		
Site		

**EQUITY OFFICE PROPERTIES (Continued)**

S112981466

Method Decode: Not reported  
Facility County: San Mateo

A7 EOP-PENINSULA OFFICE PARK, LLC HAZNET S118222725  
Target 2655 CAMPUS DR N/A  
Property SAN MATEO, CA 94403

Site 7 of 21 in cluster A

Actual:	HAZNET:
373 ft.	envid: S118222725
	Year: 2015
	GEPAID: CAC002837152
	Contact: GARY WILSON
	Telephone: 6505705468
	Mailing Name: Not reported
	Mailing Address: 950 TOWER LN
	Mailing City,St,Zip: FOSTER CITY, CA 944042121
	Gen County: San Mateo
	TSD EPA ID: CAD982042475
	TSD County: Solano
	Waste Category: Asbestos containing waste
	Disposal Method: Landfill Or Surface Impoundment That Will Be Closed As Landfill( To Include On-Site Treatment And/Or Stabilization)
	Tons: 0.23
	Cat Decode: Not reported
	Method Decode: Not reported
	Facility County: San Mateo
	envid: S118222725
	Year: 2014
	GEPAID: CAC002786543
	Contact: MICHELLE HERNANDEZ
	Telephone: 6503723558
	Mailing Name: Not reported
	Mailing Address: 2655 CAMPUS DR STE 100
	Mailing City,St,Zip: SAN MATEO, CA 944032520
	Gen County: San Mateo
	TSD EPA ID: CAD982042475
	TSD County: Solano
	Waste Category: Asbestos containing waste
	Disposal Method: Landfill Or Surface Impoundment That Will Be Closed As Landfill( To Include On-Site Treatment And/Or Stabilization)
	Tons: 0.4
	Cat Decode: Not reported
	Method Decode: Not reported
	Facility County: San Mateo

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**A8** **VERIZON WIRELESS HWY 92 ALAMEDA**  
**Target** **2929 CAMPUS**  
**Property** **SAN MATEO, CA 94403**

**San Mateo Co. BI** **S107472806**  
**N/A**

**Site 8 of 21 in cluster A**

**Actual:** San Mateo Co. BI:  
**373 ft.** Region: SAN MATEO  
Facility ID: FA0029388  
Prog Element Code: STORES HAZ MAT <1,199GAL,9,999LB,4,799FT3  
Record Id: PR0049935  
Description: STORES HAZ MAT <1,199GAL,9,999LB,4,799CF  
Facility Status: ACTIVE

**A9** **PENINSULA OFFICE PARK ASSOCIATES**  
**Target** **2988 CAMPUS DR**  
**Property** **SAN MATEO, CA 94403**

**HAZNET** **S112882568**  
**N/A**

**Site 9 of 21 in cluster A**

**Actual:** HAZNET:  
**373 ft.** envid: S112882568  
envid: S112882568  
Year: 2000  
GEPAID: CAC001325048  
Contact: GENELLE OSENDORF - SR MGR  
Telephone: 6503495531  
Mailing Name: Not reported  
Mailing Address: 2929 CAMPUS DR STE 145  
Mailing City,St,Zip: SAN MATEO, CA 944030000  
Gen County: Not reported  
TSD EPA ID: CAD044429835  
TSD County: Not reported  
Waste Category: Other inorganic solid waste  
Disposal Method: Disposal, Other  
Tons: 0.01  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo  
  
envid: S112882568  
envid: S112882568  
Year: 2000  
GEPAID: CAC001325048  
Contact: GENELLE OSENDORF - SR MGR  
Telephone: 6503495531  
Mailing Name: Not reported  
Mailing Address: 2929 CAMPUS DR STE 145  
Mailing City,St,Zip: SAN MATEO, CA 944030000  
Gen County: Not reported  
TSD EPA ID: CAD028409019  
TSD County: Not reported  
Waste Category: Other organic solids  
Disposal Method: Transfer Station  
Tons: 0.07  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**A10** **EQUITY OFFICE INC**  
**Target** **2755 CAMPUS DR**  
**Property** **SAN MATEO, CA 94403**

**HAZNET** **S112996368**  
**N/A**

**Site 10 of 21 in cluster A**

**Actual:** **373 ft.**

HAZNET:  
envid: S112996368  
Year: 2011  
GEPAID: CAC002679673  
Contact: JAMES SOUTER  
Telephone: 6503723553  
Mailing Name: Not reported  
Mailing Address: 2655 CAMPUS DR STE 100  
Mailing City,St,Zip: SAN MATEO, CA 94403  
Gen County: Not reported  
TSD EPA ID: CAD028409019  
TSD County: Not reported  
Waste Category: Other organic solids  
Disposal Method: Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery (H010-H129) Or (H131-H135)  
Tons: 0.0425  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

envid: S112996368  
Year: 2011  
GEPAID: CAC002679673  
Contact: JAMES SOUTER  
Telephone: 6503723553  
Mailing Name: Not reported  
Mailing Address: 2655 CAMPUS DR STE 100  
Mailing City,St,Zip: SAN MATEO, CA 94403  
Gen County: Not reported  
TSD EPA ID: CAD028409019  
TSD County: Not reported  
Waste Category: Unspecified oil-containing waste  
Disposal Method: Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery (H010-H129) Or (H131-H135)  
Tons: 0.03  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

**A11** **EOP-PENINSULA OFFICE PARK LLC DELAWARD LIMITED LIA**  
**Target** **2929 CAMPUS DR**  
**Property** **SAN MATEO, CA 94403**

**HAZNET** **S113458698**  
**N/A**

**Site 11 of 21 in cluster A**

**Actual:** **373 ft.**

HAZNET:  
envid: S113458698  
Year: 2010  
GEPAID: CAC002650883  
Contact: GARY WILSON  
Telephone: 6502804821  
Mailing Name: Not reported  
Mailing Address: 2929 CAMPUS DR  
Mailing City,St,Zip: SAN MATEO, CA 944032518

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**EOP-PENINSULA OFFICE PARK LLC DELAWARD LIMITED LIABILITY CO (Continued)**

**S113458698**

Gen County: Not reported  
TSD EPA ID: CAD028409019  
TSD County: Not reported  
Waste Category: Other organic solids  
Disposal Method: Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery (H010-H129) Or (H131-H135)  
Tons: 0.05  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

**A12 Target Property** **EQUITY OFFICE PROPERTIES**  
**2955 CAMPUS DRIVE**  
**SAN MATEO, CA 94403**

**EMI S108431838**  
**N/A**

**Site 12 of 21 in cluster A**

**Actual: 373 ft.** EMI:  
Year: 2005  
County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: .001  
Reactive Organic Gases Tons/Yr: .0008367  
Carbon Monoxide Emissions Tons/Yr: .003  
NOX - Oxides of Nitrogen Tons/Yr: .014  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: .001  
Part. Matter 10 Micrometers and Smllr Tons/Yr: .000976  
  
Year: 2006  
County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: .001  
Reactive Organic Gases Tons/Yr: .0008367  
Carbon Monoxide Emissions Tons/Yr: .003  
NOX - Oxides of Nitrogen Tons/Yr: .014  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: .001  
Part. Matter 10 Micrometers and Smllr Tons/Yr: .000976  
  
Year: 2007  
County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**EQUITY OFFICE PROPERTIES (Continued)**

**S108431838**

Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: .001  
Reactive Organic Gases Tons/Yr: .0008367  
Carbon Monoxide Emissions Tons/Yr: .003  
NOX - Oxides of Nitrogen Tons/Yr: .012  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: .001  
Part. Matter 10 Micrometers and Smllr Tons/Yr: .000976

Year: 2008  
County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: .001  
Reactive Organic Gases Tons/Yr: .0008367  
Carbon Monoxide Emissions Tons/Yr: .003  
NOX - Oxides of Nitrogen Tons/Yr: .012  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: .001  
Part. Matter 10 Micrometers and Smllr Tons/Yr: .000976

Year: 2009  
County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0.001  
NOX - Oxides of Nitrogen Tons/Yr: 3.0000000000000001E-3  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr: 0

Year: 2014  
County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0.000202663  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0.000612

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**EQUITY OFFICE PROPERTIES (Continued)**

**S108431838**

NOX - Oxides of Nitrogen Tons/Yr: 0.002815072  
SOX - Oxides of Sulphur Tons/Yr: 1.305e-006  
Particulate Matter Tons/Yr: 0.000209559  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0.000201176

Year: 2015  
County Code: 41  
Air Basin: SF  
Facility ID: 16529  
Air District Name: BA  
SIC Code: 6512  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0.000202663  
Reactive Organic Gases Tons/Yr: 0.000197311  
Carbon Monoxide Emissions Tons/Yr: 0.000612  
NOX - Oxides of Nitrogen Tons/Yr: 0.002815072  
SOX - Oxides of Sulphur Tons/Yr: 1.305e-006  
Particulate Matter Tons/Yr: 4.0203e-005  
Part. Matter 10 Micrometers and Smllr Tons/Yr:3.8595e-005

A13  
Target  
Property

**EOP-PENINSULA OFFICE PARK**  
**2655 CAMPUS DR**  
**SAN MATEO, CA 94403**

**HAZNET S113782583**  
N/A

**Site 13 of 21 in cluster A**

Actual:  
373 ft.

HAZNET:  
envid: S113782583  
Year: 2012  
GEPAID: CAC002697102  
Contact: JAME SOUTTER  
Telephone: 6503723553  
Mailing Name: Not reported  
Mailing Address: 2655 CAMPUS DR STE 100  
Mailing City,St,Zip: SAN MATEO, CA 94403  
Gen County: San Mateo  
TSD EPA ID: CAD028409019  
TSD County: Los Angeles  
Waste Category: Not reported  
Disposal Method: Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery  
(H010-H129) Or (H131-H135)  
Tons: 0.03  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

Map ID	Direction	Distance	Elevation	Site	Database(s)	EDR ID Number	EPA ID Number
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**A14** **EOP-PENINSULA OFFICE PARK LLC DELAWARD LIMITED LIA** **HAZNET** **S113782530**  
**Target** **2929 CAMPUS DR** **N/A**  
**Property** **SAN MATEO, CA 94403**

**Site 14 of 21 in cluster A**

**Actual:** **HAZNET:**  
**373 ft.** **envid:** S113782530  
**Year:** 2012  
**GEPAID:** CAC002697029  
**Contact:** JAMES SOUTTER  
**Telephone:** 6503723553  
**Mailing Name:** Not reported  
**Mailing Address:** 2655 CAMPUS DR STE 199  
**Mailing City,St,Zip:** SAN MATEO, CA 944032519  
**Gen County:** San Mateo  
**TSD EPA ID:** CAD028409019  
**TSD County:** Los Angeles  
**Waste Category:** Not reported  
**Disposal Method:** Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery (H010-H129) Or (H131-H135)  
**Tons:** 0.025  
**Cat Decode:** Not reported  
**Method Decode:** Not reported  
**Facility County:** San Mateo

**A15** **VERIZON WIRELESS HWY 92 ALAMEDA** **FINDS** **1023344535**  
**Target** **2929 CAMPUS DR** **N/A**  
**Property** **SAN MATEO, CA 94403**

**Site 15 of 21 in cluster A**

**Actual:** **FINDS:**  
**373 ft.** **Registry ID:** 110066403573

Environmental Interest/Information System  
STATE MASTER

Click this hyperlink while viewing on your computer to access  
additional FINDS: detail in the EDR Site Report.

**A16** **EQUITY OFFICE** **FINDS** **1023361546**  
**Target** **2955 CAMPUS DR STE B100** **N/A**  
**Property** **SAN MATEO, CA 94403**

**Site 16 of 21 in cluster A**

**Actual:** **FINDS:**  
**373 ft.** **Registry ID:** 110066587642

Environmental Interest/Information System  
STATE MASTER

Map ID  
Direction  
Distance  
Elevation

Site

MAP FINDINGS

Database(s) EDR ID Number  
EPA ID Number

**EQUITY OFFICE (Continued)**

1023361546

Click this [hyperlink](#) while viewing on your computer to access additional FINDS: detail in the EDR Site Report.

A17      **EQUITY OFFICE**  
Target    **2800 CAMPUS DR**  
Property **SAN MATEO, CA 94403**

HAZNET    S112931411  
N/A

**Site 17 of 21 in cluster A**

Actual:    HAZNET:  
373 ft.      envid:    S112931411  
              Year:    2003  
              GEPAID:   CAC002567805  
              Contact:   THERESA MARKS  
              Telephone: 6503495531  
              Mailing Name: Not reported  
              Mailing Address: 2929 CAMPUS DR STE 145  
              Mailing City,St,Zip: SAN MATEO, CA 94403  
              Gen County: Not reported  
              TSD EPA ID: CAD028409019  
              TSD County: Not reported  
              Waste Category: Other organic solids  
              Disposal Method: Transfer Station  
              Tons: 0.04  
              Cat Decode: Not reported  
              Method Decode: Not reported  
              Facility County: San Mateo

A18      **CHEMCRETE INTERNATIONAL P SHIP**  
Target    **2755 CAMPUS SUITE 125**  
Property **SAN MATEO, CA 94403**

RCRA-SQG    1000297070  
FINDS    CAD982355927  
ECHO

**Site 18 of 21 in cluster A**

Actual:    RCRA-SQG:  
373 ft.      Date form received by agency: 10/27/1987  
              Facility name:    CHEMCRETE INTERNATIONAL P SHIP  
              Facility address: 2755 CAMPUS SUITE 125  
                              SAN MATEO, CA 94403  
              EPA ID:    CAD982355927  
              Contact:    ENVIRONMENTAL MANAGER  
              Contact address: 2755 CAMPUS SUITE 125  
                              SAN MATEO, CA 94403  
              Contact country: US  
              Contact telephone: 415-541-7700  
              Contact email: Not reported  
              EPA Region: 09  
              Classification: Small Small Quantity Generator  
              Description: Handler: generates more than 100 and less than 1000 kg of hazardous waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of hazardous waste at any time

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**CHEMCRETE INTERNATIONAL P SHIP (Continued)**

**1000297070**

Owner/Operator Summary:

Owner/operator name: CHEMCRETE CORP  
Owner/operator address: NOT REQUIRED  
Owner/operator country: NOT REQUIRED, ME 99999  
Owner/operator telephone: 415-555-1212  
Owner/operator email: Not reported  
Owner/operator fax: Not reported  
Owner/operator extension: Not reported  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported  
  
Owner/operator name: NOT REQUIRED  
Owner/operator address: NOT REQUIRED  
Owner/operator country: NOT REQUIRED, ME 99999  
Owner/operator telephone: 415-555-1212  
Owner/operator email: Not reported  
Owner/operator fax: Not reported  
Owner/operator extension: Not reported  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
User oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

Violation Status: No violations found

FINDS:

Registry ID: 110002800014

Environmental Interest/Information System

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**CHEMCRETE INTERNATIONAL P SHIP (Continued)**

**1000297070**

Click this [hyperlink](#) while viewing on your computer to access additional FINDS: detail in the EDR Site Report.

ECHO:

EnvId:

1000297070

Registry ID:

110002800014

DFR URL:

<http://echo.epa.gov/detailed-facility-report?fid=110002800014>

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<b>A19</b>	<b>EOP - PENINSULA OFFICE PARK, L</b>	<b>FINDS</b>	<b>1011989262</b>
<b>Target</b>	<b>2955 CAMPUS DRIVE</b>		<b>N/A</b>
<b>Property</b>	<b>SAN MATEO, CA 94403</b>		

**Site 19 of 21 in cluster A**

**Actual:** FINDS:  
**373 ft.**

Registry ID: 110038008125

Environmental Interest/Information System  
AIR EMISSIONS CLASSIFICATION UNKNOWN

Click this [hyperlink](#) while viewing on your computer to access additional FINDS: detail in the EDR Site Report.

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<b>A20</b>	<b>EQUITY OFFICE CORP</b>	<b>HAZNET</b>	<b>S112969885</b>
<b>Target</b>	<b>2800 CAMPUS DR</b>		<b>N/A</b>
<b>Property</b>	<b>SAN MATEO, CA 94403</b>		

**Site 20 of 21 in cluster A**

**Actual:** HAZNET:  
**373 ft.**

envId:	S112969885
Year:	2008
GEPAID:	CAC002629874
Contact:	ROD MURISON
Telephone:	6503723554
Mailing Name:	Not reported
Mailing Address:	2655 CAMPUS DR STE 100
Mailing City,St,Zip:	SAN MATEO, CA 944032520
Gen County:	Not reported
TSD EPA ID:	CAD028409019
TSD County:	Not reported
Waste Category:	Asbestos containing waste
Disposal Method:	Storage, Bulking, And/Or Transfer Off Site--No Treatment/Recovery (H010-H129) Or (H131-H135)
Tons:	0.035
Cat Decode:	Not reported
Method Decode:	Not reported
Facility County:	San Mateo

envId: S112969885  
Year: 2008  
GEPAID: CAC002629874  
Contact: ROD MURISON

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**EQUITY OFFICE CORP (Continued)**

**S112969885**

Telephone: 6503723554  
Mailing Name: Not reported  
Mailing Address: 2655 CAMPUS DR STE 100  
Mailing City,St,Zip: SAN MATEO, CA 944032520  
Gen County: Not reported  
TSD EPA ID: CAD982042475  
TSD County: Not reported  
Waste Category: Asbestos containing waste  
Disposal Method: Landfill Or Surface Impoundment That Will Be Closed As Landfill( To  
Include On-Site Treatment And/Or Stabilization)  
Tons: 0.4  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo  
  
envid: S112969885  
Year: 2008  
GEPAID: CAC002629874  
Contact: ROD MURISON  
Telephone: 6503723554  
Mailing Name: Not reported  
Mailing Address: 2655 CAMPUS DR STE 100  
Mailing City,St,Zip: SAN MATEO, CA 944032520  
Gen County: Not reported  
TSD EPA ID: CAD028409019  
TSD County: Not reported  
Waste Category: Asbestos containing waste  
Disposal Method: Fuel Blending Prior To Energy Recovery At Another Site  
Tons: 0.10425  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

---

**A21** **HUDSON PACIFIC PROPERTIES LLC**  
**Target** **2955 CAMPUS**  
**Property** **SAN MATEO, CA 94403**

**San Mateo Co. BI** **S108276899**  
**N/A**

**Site 21 of 21 in cluster A**

**Actual:** San Mateo Co. BI:  
**373 ft.** Region: SAN MATEO  
Facility ID: FA0032772  
Prog Element Code: STORES MV FUELS OR WASTE ONLY  
Record Id: PR0052037  
Description: STORES MV FUELS OR WASTE ONLY  
Facility Status: ACTIVE

MAP FINDINGS

Map ID	Site	Database(s)	EDR ID Number	EPA ID Number
B22	<b>USPS INFORMATION SVC CTR</b> NE 2700 CAMPUS DR < 1/8 SAN MATEO, CA 94497 0.017 mi. 91 ft. Site 1 of 3 in cluster B		UST	U004262439 N/A
Relative: Lower	UST: Facility ID: 41-000-024882			
Actual: 290 ft.	Permitting Agency: San Mateo County Environmental Health Latitude: 37.538422 Longitude: -122.325073			
B23	<b>USPS INFORMATION SVC CTR</b> NE 2700 CAMPUS < 1/8 SAN MATEO, CA 94497 0.017 mi. 91 ft. Site 2 of 3 in cluster B		San Mateo Co. BI	S103993759 N/A
Relative: Lower	San Mateo Co. BI: Region: SAN MATEO Facility ID: FA0024882			
Actual: 290 ft.	Prog Element Code: STORES HAZ MAT <3,499GAL,27,999LB,13,999FT3 Record Id: PR0033343 Description: STORES HAZ MAT <3,499GAL,27,999LB,13,999CF Facility Status: ACTIVE			
	Region: SAN MATEO Facility ID: FA0024882 Prog Element Code: 2352 Record Id: PR0073293 Description: TIER I: TANK STOR CAP =>1,320 & <5,000 GAL Facility Status: ACTIVE			
	Region: SAN MATEO Facility ID: FA0024882 Prog Element Code: UNDERGROUND TANK - GENERAL Record Id: PR0031299 Description: UNDERGROUND TANK - GENERAL Facility Status: ACTIVE			
B24	<b>USPS INFORMATION SVC CTR</b> NE 2700 CAMPUS DR < 1/8 SAN MATEO, CA 94497 0.017 mi. 91 ft. Site 3 of 3 in cluster B		AST	A100425693 N/A
Relative: Lower	AST: Certified Unified Program Agencies: Not reported Owner: US POSTAL SERVICE			
Actual: 290 ft.	Total Gallons: Not reported CERSID: 10067434 Facility ID: 41-000-024882 Business Name: USPS INFORMATION SVC CTR Phone: (650) 377-1337 Fax: Not reported Mailing Address: 2700 CAMPUS DR Mailing Address City: SAN MATEO Mailing Address State: CA			

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**USPS INFORMATION SVC CTR (Continued)**

**A100425693**

Mailing Address Zip Code: Not reported  
Operator Name: USPS INFORMATION SVC CTR  
Operator Phone: (650) 377-5169  
Owner Phone: (650) 377-1337  
Owner Mail Address: 2700 CAMPUS DR  
Owner State: CA  
Owner Zip Code: Not reported  
Owner Country: United States  
Property Owner Name: Not reported  
Property Owner Phone: Not reported  
Property Owner Mailing Address: Not reported  
Property Owner City: Not reported  
Property Owner Stat: Not reported  
Property Owner Zip Code: Not reported  
Property Owner Country: Not reported  
EPAID: Not reported

**C25** **CHARMERS**  
**SSW** **3176 CAMPUS**  
**< 1/8** **SAN MATEO, CA 94403**  
**0.033 mi.**  
**176 ft.** **Site 1 of 4 in cluster C**

**San Mateo Co. BI** **S106982127**  
**N/A**

**Relative:** San Mateo Co. BI:  
**Higher** Region: SAN MATEO  
**Actual:** Facility ID: FA0026572  
**379 ft.** Prog Element Code: STORES HAZ MAT <219GAL,1,999LB, 879FT3  
Record Id: PR0038540  
Description: STORES HAZ MAT <219GAL,1,999LB, 879CF  
Facility Status: INACTIVE

**C26** **PENINSULA PRESS**  
**SSW** **3168 CAMPUS**  
**< 1/8** **SAN MATEO, CA 94403**  
**0.033 mi.**  
**176 ft.** **Site 2 of 4 in cluster C**

**San Mateo Co. BI** **S106981897**  
**N/A**

**Relative:** San Mateo Co. BI:  
**Higher** Region: SAN MATEO  
**Actual:** Facility ID: FA0024491  
**379 ft.** Prog Element Code: GENERATES <27 GAL/YEAR  
Record Id: PR0029201  
Description: GENERATES <27 GAL/YEAR  
Facility Status: INACTIVE

Region: SAN MATEO  
Facility ID: FA0024491  
Prog Element Code: STORES MV FUELS OR WASTE ONLY  
Record Id: PR0029202  
Description: STORES MV FUELS OR WASTE ONLY  
Facility Status: INACTIVE

MAP FINDINGS

Map ID	Site	Database(s)	EDR ID Number
Direction			EPA ID Number
Distance			
Elevation			

27 PG&E: HILLSDALE SUBSTATION San Mateo Co. BI S119781552  
 ENE ACROSS FROM 800 26TH AVE/ N/A  
 < 1/8 SAN MATEO, CA 94404  
 0.050 mi.  
 262 ft.

Relative: San Mateo Co. BI:  
 Lower Region: SAN MATEO  
 Actual: Facility ID: FA0022397  
 242 ft. Prog Element Code: STORES HAZ MAT <15999GAL, 111999LB, 5599FT^3  
 Record Id: PR0024234  
 Description: STORES HAZ MAT <15999GAL, 111999LB, 5599CF  
 Facility Status: ACTIVE

C28 HOLIDAY CLEANERS RCRA-SQG 1000247934  
 SSW 3166 CAMPUS DRIVE FINDS CAD981998156  
 < 1/8 SAN MATEO, CA 94403 ECHO  
 0.058 mi.  
 308 ft. Site 3 of 4 in cluster C San Mateo Co. BI  
 Relative: DRYCLEANERS  
 Higher HAZNET  
 Actual: RCRA-SQG:  
 380 ft. Date form received by agency: 09/01/1996  
 Facility name: HOLIDAY CLEANERS  
 Facility address: 3166 CAMPUS DR  
 SAN MATEO, CA 94402  
 EPA ID: CAD981998156  
 Contact: Not reported  
 Contact address: Not reported  
 Not reported  
 Contact country: US  
 Contact telephone: Not reported  
 Contact email: Not reported  
 EPA Region: 09  
 Classification: Small Small Quantity Generator  
 Description: Handler: generates more than 100 and less than 1000 kg of hazardous waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of hazardous waste at any time

Owner/Operator Summary:  
 Owner/operator name: NOT REQUIRED  
 Owner/operator address: NOT REQUIRED  
 NOT REQUIRED, ME 99999  
 Owner/operator country: Not reported  
 Owner/operator telephone: 415-555-1212  
 Owner/operator email: Not reported  
 Owner/operator fax: Not reported  
 Owner/operator extension: Not reported  
 Legal status: Private  
 Owner/Operator Type: Operator  
 Owner/Op start date: Not reported  
 Owner/Op end date: Not reported  
 Owner/operator name: SUSAN KIM  
 Owner/operator address: NOT REQUIRED  
 NOT REQUIRED, ME 99999  
 Owner/operator country: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**HOLIDAY CLEANERS (Continued)**

**1000247934**

Owner/operator telephone: 415-555-1212  
Owner/operator email: Not reported  
Owner/operator fax: Not reported  
Owner/operator extension: Not reported  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
User oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

Historical Generators:

Date form received by agency: 06/10/1987  
Site name: HOLIDAY CLEANERS  
Classification: Large Quantity Generator

Violation Status: No violations found

FINDS:

Registry ID: 110001168566

Environmental Interest/Information System

California Hazardous Waste Tracking System - Datamart (HWTS-DATAMART) provides California with information on hazardous waste shipments for generators, transporters, and treatment, storage, and disposal facilities.

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

HAZARDOUS AIR POLLUTANT MAJOR

[Click this hyperlink](#) while viewing on your computer to access additional FINDS: detail in the EDR Site Report.

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**HOLIDAY CLEANERS (Continued)**

**1000247934**

ECHO:

EnvId: 1000247934  
Registry ID: 110001168566  
DFR URL: <http://echo.epa.gov/detailed-facility-report?fid=110001168566>

San Mateo Co. BI:

Region: SAN MATEO  
Facility ID: FA0005805  
Prog Element Code: GENERATES and RECYCLES WASTE OIL/SOLVENT  
Record Id: PR0010741  
Description: GENERATES & RECYCLES WASTE OIL/SOLVENT  
Facility Status: INACTIVE

Region: SAN MATEO  
Facility ID: FA0005805  
Prog Element Code: STORES HAZ MAT <219GAL,1,999LB, 879FT3  
Record Id: PR0003408  
Description: STORES HAZ MAT <219GAL,1,999LB, 879CF  
Facility Status: INACTIVE

Region: SAN MATEO  
Facility ID: FA0058768  
Prog Element Code: GENERATES and RECYCLES WASTE OIL/SOLVENT  
Record Id: PR0081385  
Description: GENERATES & RECYCLES WASTE OIL/SOLVENT  
Facility Status: ACTIVE

**DRYCLEANERS:**

EPA Id: CAL000407073  
NAICS Code: 81232  
NAICS Description: Drycleaning and Laundry Services (except Coin-Operated)  
SIC Code: 7211  
SIC Description: Power Laundries, Family and Commercial  
Create Date: 05/19/2015  
Facility Active: Yes  
Inactive Date: Not reported  
Facility Addr2: Not reported  
Owner Name: JUNG JUN  
Owner Address: 1510 CHERRY ST  
Owner Address 2: Not reported  
Owner Telephone: 4089668914  
Contact Name: JUNG JUN  
Contact Address: 1510 CHERRY ST  
Contact Address 2: Not reported  
Contact Telephone: 6505731273  
Mailing Name: Not reported  
Mailing Address 1: 3166 CAMPUS DR  
Mailing Address 2: Not reported  
Mailing City: SAN MATEO  
Mailing State: CA  
Mailing Zip: 94403  
Owner Fax: Not reported  
Region Code: 2

**HAZNET:**

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**HOLIDAY CLEANERS (Continued)**

**1000247934**

envid: 1000247934  
Year: 2000  
GEPAID: CAD981998156  
Contact: SUSAN KIM  
Telephone: 6505731273  
Mailing Name: Not reported  
Mailing Address: 3166 CAMPUS DR  
Mailing City,St,Zip: SAN MATEO, CA 944030000  
Gen County: Not reported  
TSD EPA ID: CAD981397417  
TSD County: Not reported  
Waste Category: Halogenated solvents (chloroforms, methyl chloride, perchloroethylene, etc)  
Disposal Method: Not reported  
Tons: 0.07  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

envid: 1000247934  
Year: 1999  
GEPAID: CAD981998156  
Contact: DAVID KIM  
Telephone: 0000000000  
Mailing Name: Not reported  
Mailing Address: 3166 CAMPUS DR  
Mailing City,St,Zip: SAN MATEO, CA 944030000  
Gen County: Not reported  
TSD EPA ID: CAD981397417  
TSD County: Not reported  
Waste Category: Not reported  
Disposal Method: Recycler  
Tons: .0000  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

envid: 1000247934  
Year: 1999  
GEPAID: CAD981998156  
Contact: DAVID KIM  
Telephone: 0000000000  
Mailing Name: Not reported  
Mailing Address: 3166 CAMPUS DR  
Mailing City,St,Zip: SAN MATEO, CA 944030000  
Gen County: Not reported  
TSD EPA ID: CAD981397417  
TSD County: Not reported  
Waste Category: Halogenated solvents (chloroforms, methyl chloride, perchloroethylene, etc)  
Disposal Method: Recycler  
Tons: .2882  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

envid: 1000247934

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**HOLIDAY CLEANERS (Continued)**

**1000247934**

Year: 1999  
GEPAID: CAD981998156  
Contact: DAVID KIM  
Telephone: 0000000000  
Mailing Name: Not reported  
Mailing Address: 3166 CAMPUS DR  
Mailing City,St,Zip: SAN MATEO, CA 944030000  
Gen County: Not reported  
TSD EPA ID: CAD981397417  
TSD County: Not reported  
Waste Category: Halogenated solvents (chloroforms, methyl chloride, perchloroethylene, etc)  
Disposal Method: Not reported  
Tons: .0900  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo  
  
envid: 1000247934  
Year: 1999  
GEPAID: CAD981998156  
Contact: DAVID KIM  
Telephone: 0000000000  
Mailing Name: Not reported  
Mailing Address: 3166 CAMPUS DR  
Mailing City,St,Zip: SAN MATEO, CA 944030000  
Gen County: Not reported  
TSD EPA ID: CA0000084517  
TSD County: Not reported  
Waste Category: Liquids with halogenated organic compounds >= 1,000 Mg./L  
Disposal Method: Transfer Station  
Tons: .0975  
Cat Decode: Not reported  
Method Decode: Not reported  
Facility County: San Mateo

[Click this hyperlink](#) while viewing on your computer to access  
7 additional CA\_HAZNET: record(s) in the EDR Site Report.

**C29** SPRINT NEXTEL SF13XC814  
**SSW** 3130 CAMPUS  
< 1/8 SAN MATEO, CA 94403  
**0.073 mi.**  
**387 ft.** Site 4 of 4 in cluster C

San Mateo Co. BI S109521294  
N/A

**Relative:** San Mateo Co. BI:  
**Lower** Region: SAN MATEO  
**Actual:** Facility ID: FA0044820  
**353 ft.** Prog Element Code: STORES HAZ MAT <219GAL,1,999LB, 879FT3  
Record Id: PR0056948  
Description: STORES HAZ MAT <219GAL,1,999LB, 879CF  
Facility Status: INACTIVE

MAP FINDINGS

Map ID	Site	Database(s)	EDR ID Number
Direction			EPA ID Number
Distance			
Elevation			
D30	<b>SHELL</b> <b>SSW 1400 WEST HILLSDALE BOULEVARD</b> <b>&lt; 1/8 SAN MATEO, CA</b>		<b>RGA LUST S114689345</b> <b>N/A</b>
0.102 mi.			
541 ft.	<b>Site 1 of 26 in cluster D</b>		
Relative:	RGA LUST:		
Lower	2012 SHELL 1400 WEST HILLSDALE BOULEVARD		
Actual:	2011 SHELL 1400 WEST HILLSDALE BOULEVARD		
338 ft.	2010 SHELL 1400 WEST HILLSDALE BOULEVARD		
	2009 SHELL 1400 WEST HILLSDALE BOULEVARD		
	2008 SHELL 1400 WEST HILLSDALE BOULEVARD		
D31	<b>COLLEGE PLAZA SHELL</b> <b>SSW 1400 W HILLSDALE BLVD</b> <b>&lt; 1/8 SAN MATEO, CA 94403</b>		<b>UST U004263235</b> <b>N/A</b>
0.102 mi.			
541 ft.	<b>Site 2 of 26 in cluster D</b>		
Relative:	UST:		
Lower	Facility ID: Not reported		
Actual:	Permitting Agency: San Mateo County Environmental Health		
338 ft.	Latitude: 37.533188		
	Longitude: -122.327988		
D32	<b>COLLEGE PLAZA SHELL</b> <b>SSW 1400 WEST HILLSDALE BLVD</b> <b>&lt; 1/8 SAN MATEO, CA</b>		<b>RGA LUST S114604822</b> <b>N/A</b>
0.102 mi.			
541 ft.	<b>Site 3 of 26 in cluster D</b>		
Relative:	RGA LUST:		
Lower	2012 COLLEGE PLAZA SHELL 1400 WEST HILLSDALE BLVD		
Actual:	2011 COLLEGE PLAZA SHELL 1400 WEST HILLSDALE BLVD		
338 ft.	2010 COLLEGE PLAZA SHELL 1400 WEST HILLSDALE BLVD		
	2009 COLLEGE PLAZA SHELL 1400 WEST HILLSDALE BLVD		
D33	<b>SHELL</b> <b>SSW 1400 WEST HILLSDALE BOULEVARD</b> <b>&lt; 1/8 SAN MATEO, CA 94403</b>		<b>LUST S109517598</b> <b>N/A</b>
0.102 mi.			
541 ft.	<b>Site 4 of 26 in cluster D</b>		
Relative:	LUST:		
Lower	Lead Agency: SAN MATEO COUNTY LOP		
Actual:	Case Type: LUST Cleanup Site		
338 ft.	Geo Track: <a href="http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000000879">http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000000879</a>		
	Global Id: T10000000879		
	Latitude: 37.532744		
	Longitude: -122.328281		
	Status: Completed - Case Closed		
	Status Date: 07/08/2014		
	Case Worker: Not reported		
	RB Case Number: Not reported		
	Local Agency: Not reported		
	File Location: Local Agency		
	Local Case Number: 110171		

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

EDR ID Number  
Database(s) EPA ID Number

**SHELL (Continued)**

**S109517598**

Potential Media Affect: Aquifer used for drinking water supply, Soil  
Potential Contaminants of Concern: Gasoline  
Site History: Extracted from Green Environment's January 21, 2008 Status report on Subsurface Investigation, San Mateo County does not take responsibility for the accuracy of the statements made or any professional interpretations made in the referenced report. The subject site was previously an open Leaking Underground Fuel Tank (LUFT) site with the San Mateo County Health System Groundwater Protection Program (GPP), which was closed during 2001. Based on a review of site data, the current open LUFT case may be related to the previous release at the site. Therefore, the below summary includes the previous case information. 1986 Subsurface Investigation: During March 1986, Emcon Associates (Encon) advanced five exploratory borings (S-A through S-E) at the site to assess the impact of a reported product loss. Boring S-B was converted into a tank backfill well within the underground storage tank (UST) complex, and well S-B contained approximately 10 inches of separate-phase hydrocarbons at the time of installation. 1988 Subsurface Investigation: During 1988, Woodward-Clyde Consultants (WCC) of Oakland, California installed three groundwater monitoring wells (S-1, S-2, and S-3) to evaluate soil and groundwater quality beneath the site. The results of this investigation are reported in WCCs Well Installations report dated May 20, 1988. August 1989 Tank Backfill Well Installation: During August 1989, GeoStrategies, Inc. (GSI) of Hayward, California installed a second tank backfill well (S-F) within the UST complex. This backfill well was installed adjacent to backfill well S-B to aid in SPH removal. Installation activities are described in the GSI Quarterly Report dated October 12, 1989. 1986-1991 Separate-Phase Hydrocarbon Removal: Between 1986 and 1991, approximately 21 gallons of separate-phase hydrocarbons (SPH) were hand bailed from backfill wells S-B and S-F. This information is presented in a December 21, 1991 GSI Site Update report. 1998 UST System Upgrade: During October 1998, Armer/Norman and Associates of Pacheco, California removed two 5,000-gallon and two 8,000-gallon gasoline USTs as well as the associated product piping, vent piping, and dispensers from the site. A 2-inch hole was observed on the bottom of the northern-most 5,000-gallon UST during removal. No holes were observed in the remaining USTs removed. Water from a broken sewer line was also observed in the northwest corner of the UST pit. After the tanks were removed, soil was overexcavated in the former UST pit to a depth of approximately 15 feet below grade (fbg) for the installation of three 10,000-gallon double-walled fiberglass USTs. Approximately 1,176 tons of soil were excavated and disposed of at a landfill. Two tank backfill wells, S-B and S-F, were destroyed and not replaced during UST removal activities. Cambria Environmental Technology, Inc. (Cambria) collected soil samples from beneath the former USTs following the overexcavation, and from beneath the former product piping and dispenser islands. Results of the sampling are summarized in Cambrias February 25, 1999 Tank Removal, Hoist Removal, Dispenser and Product Piping Sampling Report. Groundwater Monitoring: Routine groundwater monitoring was conducted at the site between 1998 and 2001. Depth to water in site monitoring wells S-1, S-2, and S-3 ranged from 18.41 feet to 30.30 feet below the tops of casings. Groundwater flow direction at the site was typically southwest. Gasoline constituent concentrations were near or below reporting limits in site wells throughout monitoring activities. Well S-3 was paved over during 1999. 2001 Case Closure: During 2001, the GPP

Map ID  
Direction  
Distance  
Elevation

Site

MAP FINDINGS

EDR ID Number  
Database(s) EPA ID Number

**SHELL (Continued)**

**S109517598**

closed the LUFT case, and wells S-1 and S-2 were destroyed. 2008 Subsurface Investigation: During August 2008, Delta Consultants, Inc. (Delta) advanced three soil borings B-1, B-2, and B-3 to assess soil and groundwater conditions beneath the site. Gasoline constituents were detected in the soil and grab groundwater samples collected from boring B-3, and a low methyl tertiary butyl ether (MTBE) concentration was detected in the grab groundwater sample from boring B-2. Investigation activities are summarized in the September 29, 2008 Phase II Environmental Site Assessment report prepared by Delta. Based on these results, the GPP reopened the LUFT case for the site.

**LUST:**

Global Id:	T10000000879
Action Type:	Other
Date:	09/29/2008
Action:	Leak Reported
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	05/01/2012
Action:	Site Assessment Report - Regulator Responded
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	07/06/2009
Action:	Staff Letter - #20090706
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	06/15/2011
Action:	Staff Letter - #20110615
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	12/14/2012
Action:	Soil and Water Investigation Report
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	06/02/2014
Action:	Well Destruction Workplan - Regulator Responded
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	04/28/2014
Action:	Staff Letter - #20140428
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	02/25/2014
Action:	Staff Letter - #20140225
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	04/27/2009
Action:	Staff Letter - #20090427
Global Id:	T10000000879

Map ID  
Direction  
Distance  
Elevation

Site

MAP FINDINGS

Database(s) EDR ID Number  
EPA ID Number

**SHELL (Continued)**

**S109517598**

Action Type:	ENFORCEMENT
Date:	07/08/2014
Action:	Closure/No Further Action Letter - #20140708
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	01/14/2009
Action:	Notice of Responsibility - #20090115
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	02/10/2009
Action:	Staff Letter - #20090210a
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	08/15/2013
Action:	Monitoring Report - Semi-Annually
Global Id:	T10000000879
Action Type:	Other
Date:	08/21/2008
Action:	Leak Stopped
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	11/15/2011
Action:	Monitoring Report - Quarterly
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	02/15/2012
Action:	Monitoring Report - Quarterly
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	08/29/2014
Action:	Well Destruction Report
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	07/15/2010
Action:	Staff Letter - #20100715
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	08/15/2012
Action:	Monitoring Report - Quarterly
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	11/15/2012
Action:	Monitoring Report - Quarterly
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	08/30/2012

Map ID  
Direction  
Distance  
Elevation

Site

MAP FINDINGS

Database(s) EDR ID Number  
EPA ID Number

**SHELL (Continued)**

**S109517598**

Action:	Staff Letter - #20120830
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	12/01/2010
Action:	Soil and Water Investigation Workplan - Regulator Responded
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	11/15/2010
Action:	Monitoring Report - Quarterly - Regulator Responded
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	02/12/2009
Action:	Notice of Responsibility - #20090212
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	05/15/2012
Action:	Monitoring Report - Quarterly
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	02/15/2013
Action:	Monitoring Report - Semi-Annually
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	02/10/2009
Action:	Staff Letter - #20090210b
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	03/06/2009
Action:	Verbal Communication
Global Id:	T10000000879
Action Type:	ENFORCEMENT
Date:	12/12/2011
Action:	Staff Letter - #20111212
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	02/15/2011
Action:	Monitoring Report - Quarterly - Regulator Responded
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	05/15/2011
Action:	Monitoring Report - Quarterly - Regulator Responded
Global Id:	T10000000879
Action Type:	RESPONSE
Date:	11/01/2011
Action:	Soil and Water Investigation Report - Regulator Responded

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**SHELL (Continued)**

**S109517598**

Global Id: T10000000879  
Action Type: RESPONSE  
Date: 09/10/2009  
Action: Preliminary Site Assessment Workplan

Global Id: T10000000879  
Action Type: Other  
Date: 08/21/2008  
Action: Leak Discovery

Global Id: T10000000879  
Action Type: RESPONSE  
Date: 08/15/2011  
Action: Monitoring Report - Quarterly

**LUST:**

Global Id: T10000000879  
Status: Open - Case Begin Date  
Status Date: 08/21/2008

Global Id: T10000000879  
Status: Open - Site Assessment  
Status Date: 03/02/2009

Global Id: T10000000879  
Status: Open - Eligible for Closure  
Status Date: 12/27/2012

Global Id: T10000000879  
Status: Completed - Case Closed  
Status Date: 07/08/2014

Lead Agency: SAN MATEO COUNTY LOP  
Case Type: LUST Cleanup Site  
Geo Track: [http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T0608100466](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T0608100466)  
Global Id: T0608100466  
Latitude: 37.533183  
Longitude: -122.327971  
Status: Completed - Case Closed  
Status Date: 09/18/2001  
Case Worker: Not reported  
RB Case Number: 41-0490  
Local Agency: Not reported  
File Location: Local Agency Warehouse  
Local Case Number: 110021  
Potential Media Affect: Other Groundwater (uses other than drinking water)  
Potential Contaminants of Concern: Gasoline  
Site History: Not reported

**LUST:**

Global Id: T0608100466  
Contact Type: Regional Board Caseworker  
Contact Name: Regional Water Board  
Organization Name: SAN FRANCISCO BAY RWQCB (REGION 2)  
Address: 1515 CLAY ST SUITE 1400  
City: OAKLAND

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**SHELL (Continued)**

**S109517598**

Email: Not reported  
Phone Number: Not reported

LUST:

Global Id: T0608100466  
Action Type: REMEDIATION  
Date: 08/29/1989  
Action: Free Product Removal

Global Id: T0608100466  
Action Type: REMEDIATION  
Date: 08/29/1989  
Action: Pump & Treat (P&T) Groundwater

Global Id: T0608100466  
Action Type: Other  
Date: 02/10/1990  
Action: Leak Reported

Global Id: T0608100466  
Action Type: Other  
Date: 02/10/1990  
Action: Leak Discovery

Global Id: T0608100466  
Action Type: ENFORCEMENT  
Date: 01/31/1989  
Action: Notice of Responsibility - #1

LUST:

Global Id: T0608100466  
Status: Open - Case Begin Date  
Status Date: 01/31/1989

Global Id: T0608100466  
Status: Completed - Case Closed  
Status Date: 09/18/2001

D34 COLLEGE SHELL AUTO CARE  
SSW 1400 HILLSDALE  
< 1/8 SAN MATEO, CA 94403  
0.102 mi.  
541 ft. Site 5 of 26 in cluster D

LUST S105126481  
San Mateo Co. BI N/A

Relative: LUST REG 2:  
Lower Region: 2  
Actual: Facility Id: Not reported  
338 ft. Facility Status: Case Closed  
Case Number: 110021  
How Discovered: OM  
Leak Cause: Unknown  
Leak Source: Unknown  
Date Leak Confirmed: Not reported  
Oversight Program: LUST  
Prelim. Site Assesment Wokplan Submitted: Not reported  
Preliminary Site Assesment Began: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**COLLEGE SHELL AUTO CARE (Continued)**

**S105126481**

Pollution Characterization Began: Not reported  
Pollution Remediation Plan Submitted: Not reported  
Date Remediation Action Underway: Not reported  
Date Post Remedial Action Monitoring Began: Not reported

San Mateo Co. BI:

Region: SAN MATEO  
Facility ID: FA0053931  
Prog Element Code: GENERATES and RECYCLES WASTE OIL/SOLVENT  
Record Id: PR0074507  
Description: GENERATES & RECYCLES WASTE OIL/SOLVENT  
Facility Status: ACTIVE

Region: SAN MATEO  
Facility ID: FA0053931  
Prog Element Code: LESS THAN 500 TIRES  
Record Id: PR0074505  
Description: LESS THAN 500 TIRES  
Facility Status: ACTIVE

Region: SAN MATEO  
Facility ID: FA0053931  
Prog Element Code: STORES MV FUELS OR WASTE ONLY  
Record Id: PR0074506  
Description: STORES MV FUELS OR WASTE ONLY  
Facility Status: ACTIVE

D35      **SHELL OIL STATION**  
SSW      **1400 W HILLSDALE BLVD**  
< 1/8      **SAN MATEO, CA 94403**  
0.102 mi.

541 ft.      **Site 6 of 26 in cluster D**

LUST      **S101593769**  
SWEEPS UST      N/A  
HIST UST  
CA FID UST

Relative: SAN MATEO CO. LUST:  
Lower      Region: SAN MATEO  
Actual:      Facility ID: 110021  
338 ft.      Facility Status: 9- Case Closed  
Global ID: T0608100466  
APN Number: 041362280  
Case Type: SAN MATEO CO. LUST  
EDR Link ID: SAN MATEO CO. LUST

Region: SAN MATEO  
Facility ID: 110171  
Facility Status: 9- Case Closed  
Global ID: Not reported  
APN Number: 041362280  
Case Type: SAN MATEO CO. LUST  
EDR Link ID: SAN MATEO CO. LUST

**SWEEPS UST:**  
Status: Active  
Comp Number: 110092  
Number: 2  
Board Of Equalization: Not reported  
Referral Date: 04-18-94  
Action Date: 04-18-94

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**SHELL OIL STATION (Continued)**

**S101593769**

Created Date: 10-13-88  
Owner Tank Id: 6894-1404-RV-1  
SWRCB Tank Id: 41-000-110092-000001  
Tank Status: A  
Capacity: 5000  
Active Date: 04-18-94  
Tank Use: M.V. FUEL  
STG: P  
Content: REG UNLEADED  
Number Of Tanks: 5

Status: Active  
Comp Number: 110092  
Number: 2  
Board Of Equalization: Not reported  
Referral Date: 04-18-94  
Action Date: 04-18-94  
Created Date: 10-13-88  
Owner Tank Id: 6894-1404-RV-2  
SWRCB Tank Id: 41-000-110092-000002  
Tank Status: A  
Capacity: 5000  
Active Date: 04-18-94  
Tank Use: M.V. FUEL  
STG: P  
Content: REG UNLEADED  
Number Of Tanks: Not reported

Status: Active  
Comp Number: 110092  
Number: 2  
Board Of Equalization: Not reported  
Referral Date: 04-18-94  
Action Date: 04-18-94  
Created Date: 10-13-88  
Owner Tank Id: 6894-1404-SU  
SWRCB Tank Id: 41-000-110092-000003  
Tank Status: A  
Capacity: 8000  
Active Date: 04-18-94  
Tank Use: M.V. FUEL  
STG: P  
Content: PRM UNLEADED  
Number Of Tanks: Not reported

Status: Active  
Comp Number: 110092  
Number: 2  
Board Of Equalization: Not reported  
Referral Date: 04-18-94  
Action Date: 04-18-94  
Created Date: 10-13-88  
Owner Tank Id: 6894-1404-SR  
SWRCB Tank Id: 41-000-110092-000004  
Tank Status: A  
Capacity: 8000  
Active Date: 04-18-94

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**SHELL OIL STATION (Continued)**

**S101593769**

Tank Use: M.V. FUEL  
STG: P  
Content: PREMIUM UNLE  
Number Of Tanks: Not reported  
  
Status: Active  
Comp Number: 110092  
Number: 2  
Board Of Equalization: Not reported  
Referral Date: 04-18-94  
Action Date: 04-18-94  
Created Date: 10-13-88  
Owner Tank Id: 6894-1404-5WO1  
SWRCB Tank Id: 41-000-110092-000005  
Tank Status: A  
Capacity: 500  
Active Date: 04-18-94  
Tank Use: OIL  
STG: W  
Content: WASTE OIL  
Number Of Tanks: Not reported

**HIST UST:**

File Number: 0002C2D0  
URL: <http://geotracker.waterboards.ca.gov/ustpdfs/pdf/0002C2D0.pdf>  
Region: Not reported  
Facility ID: Not reported  
Facility Type: Not reported  
Other Type: Not reported  
Contact Name: Not reported  
Telephone: Not reported  
Owner Name: Not reported  
Owner Address: Not reported  
Owner City,St,Zip: Not reported  
Total Tanks: Not reported  
  
Tank Num: Not reported  
Container Num: Not reported  
Year Installed: Not reported  
Tank Capacity: Not reported  
Tank Used for: Not reported  
Type of Fuel: Not reported  
Container Construction Thickness: Not reported  
Leak Detection: Not reported

[Click here for Geo Tracker PDF:](#)

**CA FID UST:**

Facility ID: 41000477  
Regulated By: UTNKA  
Regulated ID: Not reported  
Cortese Code: Not reported  
SIC Code: Not reported  
Facility Phone: Not reported  
Mail To: Not reported  
Mailing Address: P O BOX

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**SHELL OIL STATION (Continued)**

**S101593769**

Mailing Address 2: Not reported  
Mailing City,St,Zip: SAN MATEO 94403  
Contact: Not reported  
Contact Phone: Not reported  
DUNs Number: Not reported  
NPDES Number: Not reported  
EPA ID: Not reported  
Comments: Not reported  
Status: Active

**D36 HILLSDALE / CAMPUS**  
**SSW 1400 W HILLSDALE BLVD**  
**< 1/8 SAN MATEO, CA 94403**  
**0.102 mi.**  
**541 ft.**

**HIST UST U001596076**  
**N/A**

Site 7 of 26 in cluster D

**Relative:** HIST UST:  
**Lower:** File Number: Not reported  
**Actual:** URL: Not reported  
**338 ft.** Region: STATE  
Facility ID: 00000037881  
Facility Type: Gas Station  
Other Type: Not reported  
Contact Name: DAVID A. HYLEN  
Telephone: 4155737959  
Owner Name: SHELL OIL COMPANY  
Owner Address: P.O. BOX 4848  
Owner City,St,Zip: ANAHEIM, CA 92803  
Total Tanks: 0005  
  
Tank Num: 001  
Container Num: 1  
Year Installed: 1967  
Tank Capacity: 00008000  
Tank Used for: PRODUCT  
Type of Fuel: UNLEADED  
Container Construction Thickness: 1/4  
Leak Detection: Stock Inventor, 10  
  
Tank Num: 002  
Container Num: 2  
Year Installed: 1969  
Tank Capacity: 00000550  
Tank Used for: WASTE  
Type of Fuel: WASTE OIL  
Container Construction Thickness: 12  
Leak Detection: Stock Inventor, 10  
  
Tank Num: 003  
Container Num: 3  
Year Installed: 1969  
Tank Capacity: 00008000  
Tank Used for: PRODUCT  
Type of Fuel: REGULAR  
Container Construction Thickness: 1/4  
Leak Detection: Stock Inventor, 10  
  
Tank Num: 004

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**HILLSDALE / CAMPUS (Continued)**

**U001596076**

Container Num: 4  
Year Installed: 1969  
Tank Capacity: 00005000  
Tank Used for: PRODUCT  
Type of Fuel: PREMIUM  
Container Construction Thickness: 1/4  
Leak Detection: Stock Inventor, 10

Tank Num: 005  
Container Num: 5  
Year Installed: 1969  
Tank Capacity: 00005000  
Tank Used for: PRODUCT  
Type of Fuel: PREMIUM  
Container Construction Thickness: 1/4  
Leak Detection: Stock Inventor, 10

D37 COLLEGE PLAZA SHELL  
SSW 1400 HILLSDALE  
< 1/8 SAN MATEO, CA 94403  
0.102 mi.  
541 ft. Site 8 of 26 in cluster D

San Mateo Co. BI S105126305  
HIST CORTESE N/A

Relative: San Mateo Co. BI:  
Lower Region: SAN MATEO  
Actual: Facility ID: FA0016960  
338 ft. Prog Element Code: LESS THAN 500 TIRES  
Record Id: PR0045759  
Description: LESS THAN 500 TIRES  
Facility Status: INACTIVE  
  
Region: SAN MATEO  
Facility ID: FA0016960  
Prog Element Code: GENERATES <27 GAL/YEAR  
Record Id: PR0024066  
Description: GENERATES <27 GAL/YEAR  
Facility Status: ACTIVE  
  
Region: SAN MATEO  
Facility ID: FA0016960  
Prog Element Code: STORES MV FUELS OR WASTE ONLY  
Record Id: PR0003294  
Description: STORES MV FUELS OR WASTE ONLY  
Facility Status: ACTIVE  
  
Region: SAN MATEO  
Facility ID: FA0016960  
Prog Element Code: UNDERGROUND TANK - GENERAL  
Record Id: PR0022153  
Description: UNDERGROUND TANK - GENERAL  
Facility Status: ACTIVE

HIST CORTESE:  
Region: CORTESE  
Facility County Code: Not reported  
Reg By: Not reported  
Reg Id: Not reported



MAP FINDINGS

Map ID	Site	Database(s)	EDR ID Number
Direction			EPA ID Number
Distance			
Elevation			

**SHELL (Continued)**

**S114689343**

2004 SHELL 1400 HILLSDALE  
2003 SHELL 1400 HILLSDALE

**D41** SHELL RGA LUST **S114689342**  
**SSW** 1400 HILLSDALE BLVD W N/A  
**< 1/8** SAN MATEO, CA

**0.102 mi.**  
**541 ft.** Site 12 of 26 in cluster D

Relative: RGA LUST:  
Lower 2002 SHELL 1400 HILLSDALE BLVD W  
Actual: 2001 SHELL 1400 HILLSDALE BLVD W  
338 ft. 2000 SHELL 1400 HILLSDALE BLVD W  
1998 SHELL 1400 HILLSDALE BLVD W  
1997 SHELL 1400 HILLSDALE BLVD W  
1996 SHELL 1400 HILLSDALE BLVD W  
1995 SHELL 1400 HILLSDALE BLVD W  
1994 SHELL 1400 HILLSDALE BLVD W  
1993 SHELL 1400 HILLSDALE BLVD W

**D42** CELIA'S MEXICAN RESTAURANT San Mateo Co. BI **S121021281**  
**SSW** 3190 CAMPUS N/A  
**< 1/8** SAN MATEO, CA 94401

**0.104 mi.**  
**551 ft.** Site 13 of 26 in cluster D

Relative: San Mateo Co. BI:  
Higher Region: SAN MATEO  
Actual: Facility ID: FA0062670  
382 ft. Prog Element Code: STORES MV FUELS OR WASTE ONLY  
Record Id: PR0085546  
Description: STORES MV FUELS OR WASTE ONLY  
Facility Status: ACTIVE

**D43** CHEVRON 9-5716 RGA LUST **S114598068**  
**South** 1350 HILLSDALE BLVD W N/A  
**< 1/8** SAN MATEO, CA

**0.119 mi.**  
**628 ft.** Site 14 of 26 in cluster D

Relative: RGA LUST:  
Lower 1995 CHEVRON 9-5716 1350 HILLSDALE BLVD W  
Actual:  
341 ft.

**D44** RITE AID #5903 San Mateo Co. BI **S112437480**  
**South** 1320 HILLSDALE N/A  
**< 1/8** SAN MATEO, CA 94403

**0.119 mi.**  
**628 ft.** Site 15 of 26 in cluster D

Relative: San Mateo Co. BI:  
Lower Region: SAN MATEO  
Actual: Facility ID: FA0007272  
341 ft. Prog Element Code: 2231

**MAP FINDINGS**

Map ID	Site	Database(s)	EDR ID Number
Direction			EPA ID Number
Distance			
Elevation			

**LP'S TOWN & COUNTRY (Continued)**

**S117398849**

Facility Status: ACTIVE

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**E58** **TOWN AND COUNTRY CLEANERS** **DRYCLEANERS** **S104576112**  
**South** **1234 W HILLSDALE BLVD** **N/A**  
**1/8-1/4** **SAN MATEO, CA 94403**

**0.153 mi.**

**809 ft.** **Site 3 of 8 in cluster E**

**Relative:** DRYCLEANERS:  
**Lower** EPA Id: CAL000040443  
**Actual:** NAICS Code: 81232  
**346 ft.** NAICS Description: Drycleaning and Laundry Services (except Coin-Operated)  
SIC Code: 7211  
SIC Description: Power Laundries, Family and Commercial  
Create Date: 09/17/1990  
Facility Active: No  
Inactive Date: 06/30/2014  
Facility Addr2: Not reported  
Owner Name: LAUNDRY & DC EQUIPMEN  
Owner Address: 1234 W HILLSDALE BLVD  
Owner Address 2: Not reported  
Owner Telephone: 4153490555  
Contact Name: JOHN KIM OWNER  
Contact Address: 1234 W HILLSDALE BLVD  
Contact Address 2: Not reported  
Contact Telephone: 4153490555  
Mailing Name: Not reported  
Mailing Address 1: 1234 W HILLSDALE BLVD  
Mailing Address 2: Not reported  
Mailing City: SAN MATEO  
Mailing State: CA  
Mailing Zip: 944033124  
Owner Fax: 0000000000  
Region Code: 2

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**E59** **TOWN & COUNTRY CLEANERS** **EDR Hist Cleaner** **1018768483**  
**South** **1234 W HILLSDALE** **N/A**  
**1/8-1/4** **SAN MATEO, CA 94403**

**0.153 mi.**

**809 ft.** **Site 4 of 8 in cluster E**

**Relative:** EDR Hist Cleaner  
**Lower**

**Actual:** **346 ft.** Year: Name: Type:  
1980 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1982 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1983 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1985 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1986 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1987 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1988 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1989 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1990 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1991 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1992 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs  
1993 TOWN & COUNTRY CLEANERS Drycleaning Plants, Except Rugs

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

EDR ID Number  
EPA ID Number  
Database(s)

**TOWN & COUNTRY CLEANERS (Continued)**

**1018768483**

1994	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
1995	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
1996	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
1997	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
1998	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
1999	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2000	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2001	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2002	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2003	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2004	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2005	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2006	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2007	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2008	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2009	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2010	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2011	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2012	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2013	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs
2014	TOWN & COUNTRY CLEANERS	Drycleaning Plants, Except Rugs

E60	<b>TOWN &amp; COUNTRY CLEANERS</b>	<b>RCRA-SQG</b>	<b>1000303955</b>
South	1234 W HILLSDALE BLVD	<b>FINDS</b>	<b>CAD981632649</b>
1/8-1/4	SAN MATEO, CA 94403	<b>ECHO</b>	
0.153 mi.		<b>San Mateo Co. BI</b>	
809 ft.	<b>Site 5 of 8 in cluster E</b>	<b>DRYCLEANERS</b>	
<b>Relative:</b> <b>Lower</b>	<b>RCRA-SQG:</b>	<b>EMI</b>	

<b>Actual:</b> <b>346 ft.</b>	Date form received by agency: 09/01/1996
	Facility name: TOWN & COUNTRY CLEANERS
	Facility address: 1234 W HILLSDALE BLVD SAN MATEO, CA 94403
	EPA ID: CAD981632649
	Contact: Not reported
	Contact address: Not reported
	Not reported
	Contact country: US
	Contact telephone: Not reported
	Contact email: Not reported
	EPA Region: 09
	Classification: Small Small Quantity Generator
	Description: Handler: generates more than 100 and less than 1000 kg of hazardous waste during any calendar month and accumulates less than 6000 kg of hazardous waste at any time; or generates 100 kg or less of hazardous waste during any calendar month, and accumulates more than 1000 kg of hazardous waste at any time

**Owner/Operator Summary:**

Owner/operator name:	NOT REQUIRED
Owner/operator address:	NOT REQUIRED
	NOT REQUIRED, ME 99999
Owner/operator country:	Not reported
Owner/operator telephone:	415-555-1212
Owner/operator email:	Not reported
Owner/operator fax:	Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

Owner/operator extension: Not reported  
Legal status: Private  
Owner/Operator Type: Operator  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported  
  
Owner/operator name: SONG CHOW  
Owner/operator address: NOT REQUIRED  
NOT REQUIRED, ME 99999  
Owner/operator country: Not reported  
Owner/operator telephone: 415-555-1212  
Owner/operator email: Not reported  
Owner/operator fax: Not reported  
Owner/operator extension: Not reported  
Legal status: Private  
Owner/Operator Type: Owner  
Owner/Op start date: Not reported  
Owner/Op end date: Not reported

Handler Activities Summary:

U.S. importer of hazardous waste: No  
Mixed waste (haz. and radioactive): No  
Recycler of hazardous waste: No  
Transporter of hazardous waste: No  
Treater, storer or disposer of HW: No  
Underground injection activity: No  
On-site burner exemption: No  
Furnace exemption: No  
Used oil fuel burner: No  
Used oil processor: No  
User oil refiner: No  
Used oil fuel marketer to burner: No  
Used oil Specification marketer: No  
Used oil transfer facility: No  
Used oil transporter: No

Historical Generators:

Date form received by agency: 12/09/1986  
Site name: TOWN & COUNTRY CLEANERS  
Classification: Large Quantity Generator

Violation Status: No violations found

FINDS:

Registry ID: 110001171286

Environmental Interest/Information System  
HAZARDOUS AIR POLLUTANT MAJOR

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

Map ID  
Direction  
Distance  
Elevation

Site

MAP FINDINGS

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

STATE MASTER

Click this [hyperlink](#) while viewing on your computer to access additional FINDS: detail in the EDR Site Report.

ECHO:

Envid: 1000303955  
Registry ID: 110001171286  
DFR URL: <http://echo.epa.gov/detailed-facility-report?fid=110001171286>

San Mateo Co. BI:

Region:	SAN MATEO
Facility ID:	FA0017018
Prog Element Code:	GENERATES and RECYCLES WASTE OIL/SOLVENT
Record Id:	PR0010657
Description:	GENERATES & RECYCLES WASTE OIL/SOLVENT
Facility Status:	INACTIVE
Region:	SAN MATEO
Facility ID:	FA0017018
Prog Element Code:	STORES HAZ MAT <219GAL,1,999LB, 879FT3
Record Id:	PR0003284
Description:	STORES HAZ MAT <219GAL,1,999LB, 879CF
Facility Status:	INACTIVE

DRYCLEANERS:

EPA Id:	CAL000401234
NAICS Code:	81232
NAICS Description:	Drycleaning and Laundry Services (except Coin-Operated)
SIC Code:	7211
SIC Description:	Power Laundries, Family and Commercial
Create Date:	10/13/2014
Facility Active:	Yes
Inactive Date:	Not reported
Facility Addr2:	Not reported
Owner Name:	LEEPAK CORPORATION
Owner Address:	1234 W HILLSDALE BLVD
Owner Address 2:	Not reported
Owner Telephone:	4082012540
Contact Name:	PHILIP LEE
Contact Address:	1234 W HILLSDALE BLVD
Contact Address 2:	Not reported
Contact Telephone:	4082012540
Mailing Name:	Not reported
Mailing Address 1:	1234 W HILLSDALE BLVD
Mailing Address 2:	Not reported
Mailing City:	SAN MATEO
Mailing State:	CA
Mailing Zip:	94403
Owner Fax:	Not reported
Region Code:	2

EMI:

Year:

1987

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 2  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 1990  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 1995  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 1996  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 1997  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 1998  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 1999  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2000  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2001  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 1  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2002  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2003  
County Code: 41

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2004  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0.499  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2005  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2006  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: .499  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2007  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: .499  
Reactive Organic Gases Tons/Yr: .3486014  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2008  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: .819  
Reactive Organic Gases Tons/Yr: .128  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

Year: 2009  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0.499  
Reactive Organic Gases Tons/Yr: 0  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0

Map ID  
Direction  
Distance  
Elevation

MAP FINDINGS

Site

Database(s) EDR ID Number  
EPA ID Number

**TOWN & COUNTRY CLEANERS (Continued)**

**1000303955**

Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0  
  
Year: 2010  
County Code: 41  
Air Basin: SF  
Facility ID: 311  
Air District Name: BA  
SIC Code: 7216  
Air District Name: BAY AREA AQMD  
Community Health Air Pollution Info System: Not reported  
Consolidated Emission Reporting Rule: Not reported  
Total Organic Hydrocarbon Gases Tons/Yr: 0.8189999999999995  
Reactive Organic Gases Tons/Yr: 0.47660140000000001  
Carbon Monoxide Emissions Tons/Yr: 0  
NOX - Oxides of Nitrogen Tons/Yr: 0  
SOX - Oxides of Sulphur Tons/Yr: 0  
Particulate Matter Tons/Yr: 0  
Part. Matter 10 Micrometers and Smllr Tons/Yr:0

---

**E61 WELLMORE ENTERPRISES INC** EDR Hist Cleaner **1020118676**  
South **1232 W HILLSDALE BLVD** N/A  
1/8-1/4 **SAN MATEO, CA 94403**

**0.154 mi.**  
**813 ft.** Site 6 of 8 in cluster E

Relative: EDR Hist Cleaner  
Lower

Actual: Year: Name: Type:  
**347 ft.** 1971 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs  
1972 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs  
1973 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs  
1974 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs  
1975 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs  
1976 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs  
1977 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs  
1978 WELLMORE ENTERPRISES INC Drycleaning Plants, Except Rugs

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**E62 PIAZZAS FINE FOODS** San Mateo Co. BI **S119781511**  
South **1218 HILLSDALE** N/A  
1/8-1/4 **SAN MATEO, CA 94403**

**0.156 mi.**  
**824 ft.** Site 7 of 8 in cluster E

Relative: San Mateo Co. BI:  
Lower Region: SAN MATEO  
Actual: Facility ID: FA0004179  
**351 ft.** Prog Element Code: STORES MV FUELS OR WASTE ONLY  
Record Id: PR0083772  
Description: STORES MV FUELS OR WASTE ONLY  
Facility Status: ACTIVE

Count: 0 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
NO SITES FOUND					

## GEOCHECK® - PHYSICAL SETTING SOURCE ADDENDUM

### TARGET PROPERTY ADDRESS

PENINSULA OFFICE PARK  
2655, 2755, 2800, 2929, 2955, & 2988 CAMPUS DRIVE  
SAN MATEO, CA 94403

### TARGET PROPERTY COORDINATES

Latitude (North):	37.536551 - 37° 32' 11.58"
Longitude (West):	122.326402 - 122° 19' 35.05"
Universal Tranverse Mercator:	Zone 10
UTM X (Meters):	559512.2
UTM Y (Meters):	4154405.0
Elevation:	373 ft. above sea level

### USGS TOPOGRAPHIC MAP

Target Property Map: 5640626 SAN MATEO, CA  
Version Date: 2012

EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

Assessment of the impact of contaminant migration generally has two principal investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata.

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

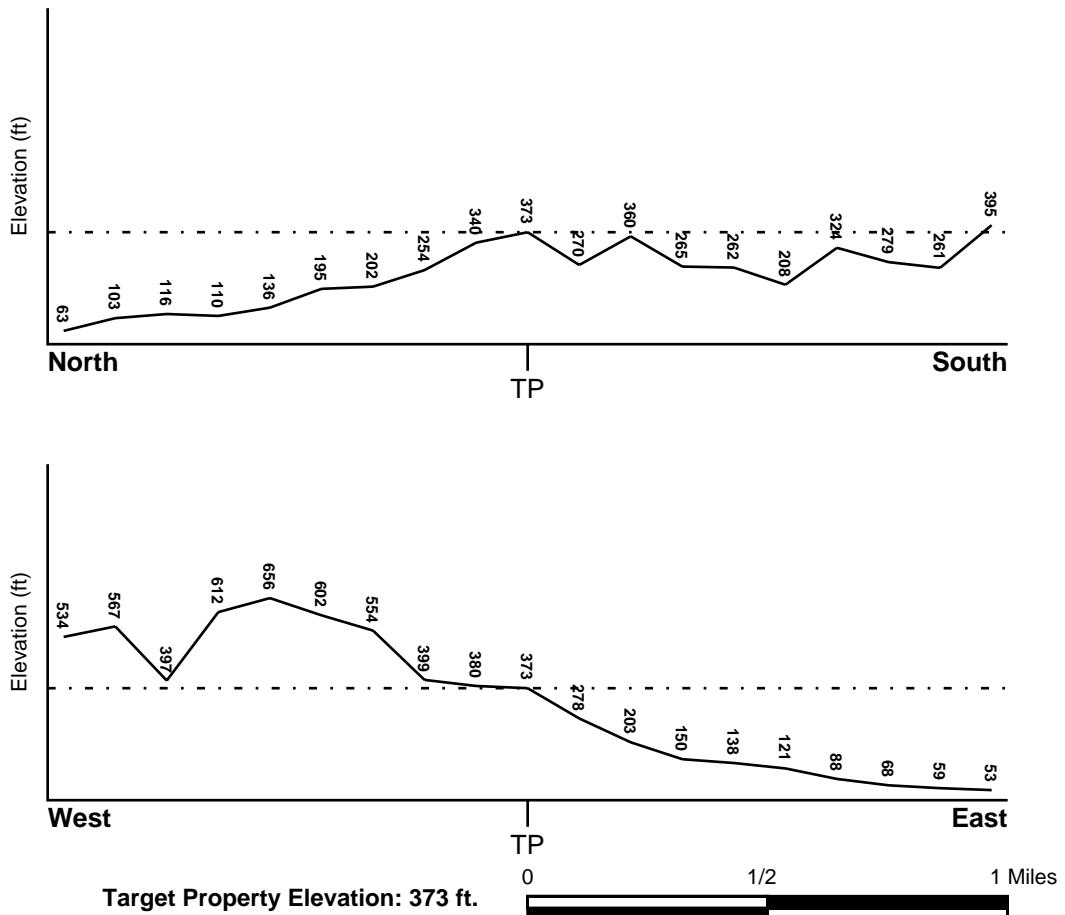
### TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

#### **TARGET PROPERTY TOPOGRAPHY**

General Topographic Gradient: General ENE

#### **SURROUNDING TOPOGRAPHY: ELEVATION PROFILES**



Source: Topography has been determined from the USGS 7.5' Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### **HYDROLOGIC INFORMATION**

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

### **FEMA FLOOD ZONE**

<u>Flood Plain Panel at Target Property</u>	<u>FEMA Source Type</u>
06081C0162F	FEMA FIRM Flood data
<u>Additional Panels in search area:</u>	<u>FEMA Source Type</u>
0603200000B	FEMA Q3 Flood data
06081C0166F	FEMA FIRM Flood data
0603110140B	FEMA Q3 Flood data
0603280000B	FEMA Q3 Flood data
06081C0168F	FEMA FIRM Flood data

### **NATIONAL WETLAND INVENTORY**

<u>NWI Quad at Target Property</u>	NWI Electronic
SAN MATEO	<u>Data Coverage</u> YES - refer to the Overview Map and Detail Map

### **HYDROGEOLOGIC INFORMATION**

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

#### ***Site-Specific Hydrogeological Data\*:***

Search Radius: 1.25 miles  
Status: Not found

### **AQUIFLOW®**

Search Radius: 1.000 Mile.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

<u>MAP ID</u>	<u>LOCATION FROM TP</u>	<u>GENERAL DIRECTION GROUNDWATER FLOW</u>
A1	1/4 - 1/2 Mile SSW	ENE
A2	1/4 - 1/2 Mile SSW	SSW
3	1/4 - 1/2 Mile NE	Not Reported
1G	1/4 - 1/2 Mile NE	Not Reported

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

<u>MAP ID</u>	<u>LOCATION</u>	<u>GENERAL DIRECTION</u>
	<u>FROM TP</u>	<u>GROUNDWATER FLOW</u>
2G	1/4 - 1/2 Mile SSW	ENE
3G	1/4 - 1/2 Mile SSW	SSW

For additional site information, refer to Physical Setting Source Map Findings.

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

### GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

#### ROCK STRATIGRAPHIC UNIT

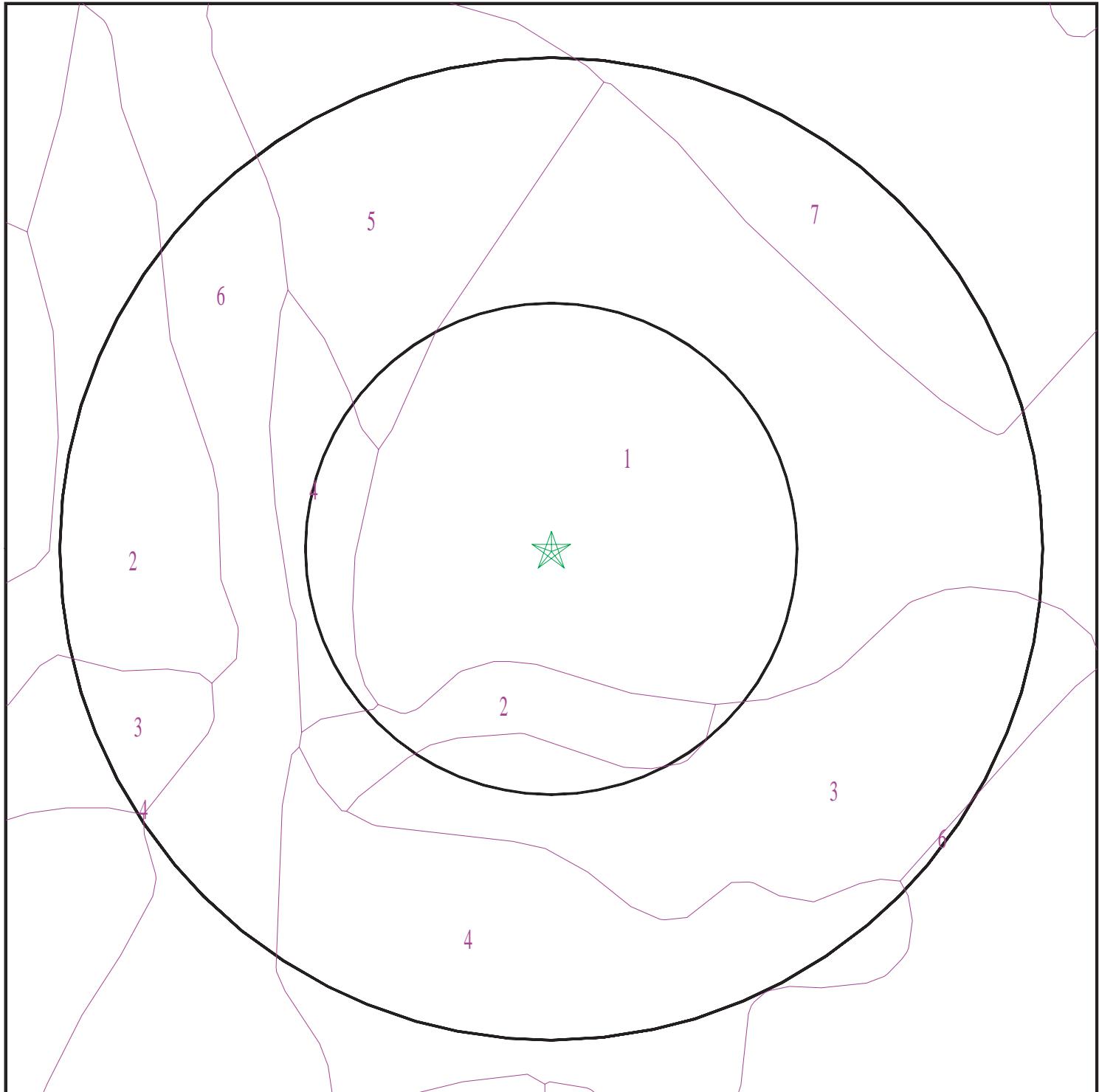
Era: Mesozoic  
System: Cretaceous  
Series: Upper Mesozoic  
Code: uMze(*decoded above as Era, System & Series*)

#### GEOLOGIC AGE IDENTIFICATION

Category: Eugeosynclinal Deposits

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

# SSURGO SOIL MAP - 5278277.2s



★ Target Property

~ SSURGO Soil

~ Water

SITE NAME: Peninsula Office Park  
ADDRESS: 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
San Mateo CA 94403  
LAT/LONG: 37.536551 / 122.326402

CLIENT: Targus Associates  
CONTACT: Kate Finley  
INQUIRY #: 5278277.2s  
DATE: May 02, 2018 7:44 am

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. The following information is based on Soil Conservation Service SSURGO data.

---

#### Soil Map ID: 1

Soil Component Name: Urban land

Soil Surface Texture:

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class:

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	5 inches		Not reported	Not reported	Max: 0.01 Min: 0	Max: Min:

---

#### Soil Map ID: 2

Soil Component Name: Orthents

Soil Surface Texture:

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	59 inches		Not reported	Not reported	Max: Min:	Max: Min:

### Soil Map ID: 3

Soil Component Name: Los Gatos

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 91 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information							
	Boundary			Classification		Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil		
1	0 inches	22 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay. FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 14 Min: 4	Max: 7.3 Min: 5.6
2	22 inches	35 inches	sandy clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 4 Min: 1.4	Max: 7.3 Min: 5.6

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Soil Layer Information								
	Boundary			Classification			Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil			
3	35 inches	40 inches	unweathered bedrock	Not reported	Not reported		Max: Min:	Max: Min:

### Soil Map ID: 4

Soil Component Name: Urban land

Soil Surface Texture:

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class:

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information								
	Boundary			Classification			Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil			
1	0 inches	5 inches		Not reported	Not reported		Max: 0.01 Min: 0	Max: Min:

### Soil Map ID: 5

Soil Component Name: Fagan

Soil Surface Texture: loam

Hydrologic Group: Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.

Soil Drainage Class: Well drained

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Moderate

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information								
	Boundary			Classification			Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil			
1	0 inches	5 inches	loam	Not reported	Not reported		Max: 14 Min: 4	Max: 7.3 Min: 5.6
2	5 inches	25 inches	clay loam	Not reported	Not reported		Max: 4 Min: 1.4	Max: 7.3 Min: 5.6
3	25 inches	42 inches	clay	Not reported	Not reported		Max: 1.4 Min: 0.42	Max: 7.3 Min: 5.6
4	42 inches	46 inches		Not reported	Not reported		Max: Min:	Max: Min:

### Soil Map ID: 6

Soil Component Name: Orthents

Soil Surface Texture:

Hydrologic Group: Class D - Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.

Soil Drainage Class: Well drained

Hydric Status: Not hydric

Corrosion Potential - Uncoated Steel: Not Reported

Depth to Bedrock Min: > 0 inches

Depth to Watertable Min: > 0 inches

Soil Layer Information								
	Boundary			Classification			Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil			
1	0 inches	59 inches		Not reported	Not reported		Max: Min:	Max: Min:

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### Soil Map ID: 7

Soil Component Name: Orthents  
Soil Surface Texture: variable  
Hydrologic Group: Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.  
Soil Drainage Class: Well drained  
Hydric Status: Not hydric  
Corrosion Potential - Uncoated Steel: Not Reported  
Depth to Bedrock Min: > 0 inches  
Depth to Watertable Min: > 0 inches

Soil Layer Information								
	Boundary			Classification			Saturated hydraulic conductivity micro m/sec	Soil Reaction (pH)
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil			
1	0 inches	59 inches	variable	Not reported	Not reported		Max: Min:	Max: Min:

### LOCAL / REGIONAL WATER AGENCY RECORDS

EDR Local/Regional Water Agency records provide water well information to assist the environmental professional in assessing sources that may impact ground water flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

### WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

### FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION</u> <u>FROM TP</u>
_____	_____	_____

## GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

### FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No Wells Found		

### FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

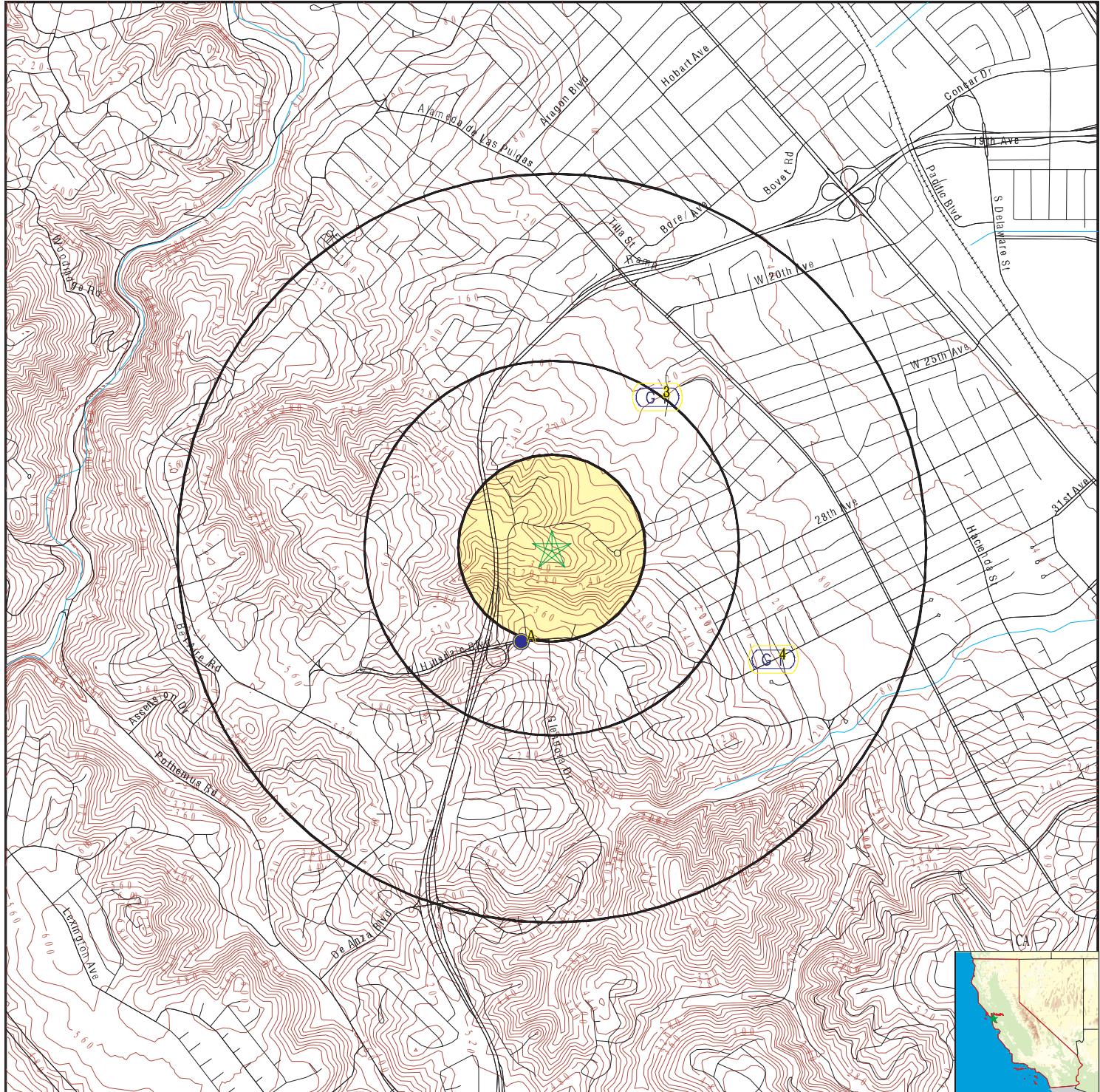
MAP ID	WELL ID	LOCATION FROM TP
No PWS System Found		

Note: PWS System location is not always the same as well location.

### STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No Wells Found		

# PHYSICAL SETTING SOURCE MAP - 5278277.2s



County Boundary

Major Roads

Contour Lines

Earthquake Fault Lines

Earthquake epicenter, Richter 5 or greater

Water Wells

Public Water Supply Wells

Cluster of Multiple Icons

0 1/4 1/2 1 Miles

- ↑ Groundwater Flow Direction
- (GI) Indeterminate Groundwater Flow at Location
- (GV) Groundwater Flow Varies at Location
- (HD) Closest Hydrogeological Data
- Oil, gas or related wells

SITE NAME: Peninsula Office Park  
 ADDRESS: 2655, 2755, 2800, 2929, 2955, & 2988 Campus Drive  
 San Mateo CA 94403  
 LAT/LONG: 37.536551 / 122.326402

CLIENT: Targus Associates  
 CONTACT: Kate Finley  
 INQUIRY #: 5278277.2s  
 DATE: May 02, 2018 7:44 am

## GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance Elevation		Database	EDR ID Number
<b>A1</b> <b>SSW</b> <b>1/4 - 1/2 Mile</b> <b>Lower</b>	Site ID: 110072 Groundwater Flow: ENE Shallow Water Depth: 28.46 Deep Water Depth: 38.42 Average Water Depth: Not Reported Date: 02/18/1999	<b>AQUIFLOW</b>	<b>67138</b>
<b>A2</b> <b>SSW</b> <b>1/4 - 1/2 Mile</b> <b>Lower</b>	Site ID: 41-0490 Groundwater Flow: SSW Shallow Water Depth: 10.57 Deep Water Depth: 29.51 Average Water Depth: Not Reported Date: 10/12/1989	<b>AQUIFLOW</b>	<b>67170</b>
<b>3</b> <b>NE</b> <b>1/4 - 1/2 Mile</b> <b>Lower</b>	Site ID: 41-0411 Groundwater Flow: Not Reported Shallow Water Depth: 8.66 Deep Water Depth: 10.61 Average Water Depth: Not Reported Date: 02/26/1996	<b>AQUIFLOW</b>	<b>67616</b>
<b>4</b> <b>ESE</b> <b>1/2 - 1 Mile</b> <b>Lower</b>	Site ID: 110114 Groundwater Flow: Not Reported Shallow Water Depth: 7.2 Deep Water Depth: 20 Average Water Depth: Not Reported Date: 12/22/1988	<b>AQUIFLOW</b>	<b>67774</b>
<b>1G</b> <b>NE</b> <b>1/4 - 1/2 Mile</b> <b>Lower</b>	Site ID: 41-0411 Groundwater Flow: Not Reported Shallow Water Depth: 8.66 Deep Water Depth: 10.61 Average Water Depth: Not Reported Date: 02/26/1996	<b>AQUIFLOW</b>	<b>67616</b>
<b>2G</b> <b>SSW</b> <b>1/4 - 1/2 Mile</b> <b>Lower</b>	Site ID: 110072 Groundwater Flow: ENE Shallow Water Depth: 28.46 Deep Water Depth: 38.42 Average Water Depth: Not Reported Date: 02/18/1999	<b>AQUIFLOW</b>	<b>67138</b>
<b>3G</b> <b>SSW</b> <b>1/4 - 1/2 Mile</b> <b>Lower</b>	Site ID: 41-0490 Groundwater Flow: SSW Shallow Water Depth: 10.57 Deep Water Depth: 29.51 Average Water Depth: Not Reported Date: 10/12/1989	<b>AQUIFLOW</b>	<b>67170</b>

# GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

## RADON

### AREA RADON INFORMATION

State Database: CA Radon

#### Radon Test Results

Zipcode	Num Tests	> 4 pCi/L
94403	68	1

Federal EPA Radon Zone for SAN MATEO County: 2

Note: Zone 1 indoor average level > 4 pCi/L.

- : Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
- : Zone 3 indoor average level < 2 pCi/L.

---

Federal Area Radon Information for Zip Code: 94403

Number of sites tested: 2

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	0.450 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	Not Reported	Not Reported	Not Reported	Not Reported

# UNINCORPORATED AREA 060311

Subject Property

CITY OF SAN MATEO  
060328

92



MAP SCALE 1" = 500'

250 0 500 1000 FEET  
METRES

NFIP

PANEL 0162F

**FIRM**  
FLOOD INSURANCE RATE MAP  
SAN MATEO COUNTY,  
CALIFORNIA  
AND INCORPORATED AREAS

## PANEL 162 OF 510

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
SAN MATEO COUNTY	060311	0162	F
HILLSBOROUGH, TOWN OF	060320	0162	F
SAN MATEO, CITY OF	060328	0162	F

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.



MAP NUMBER  
06081C0162F

MAP REVISED  
JULY 16, 2015

Federal Emergency Management Agency

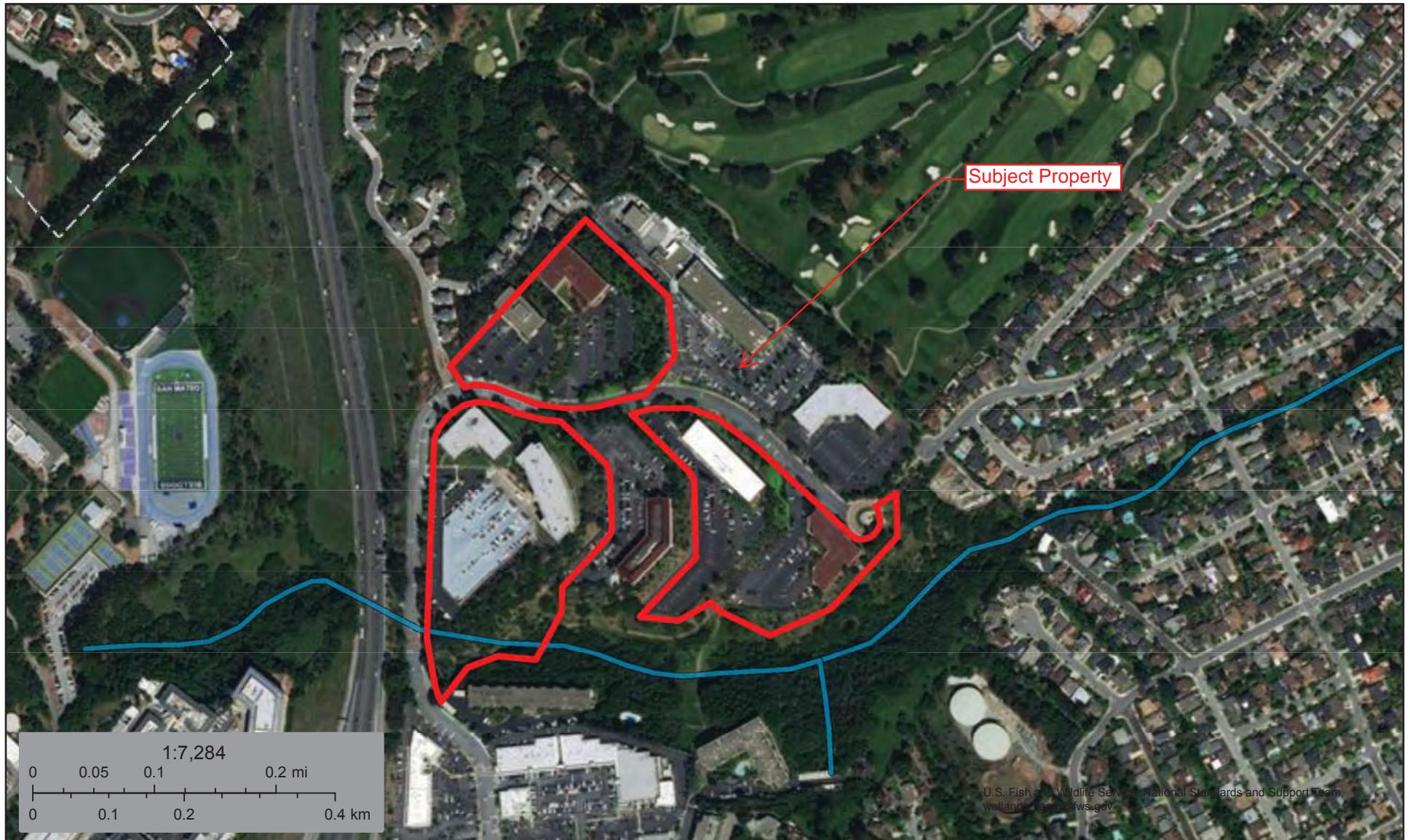
This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at [www.msfc.fema.gov](http://www.msfc.fema.gov)



U.S. Fish and Wildlife Service

# National Wetlands Inventory

T18-3719



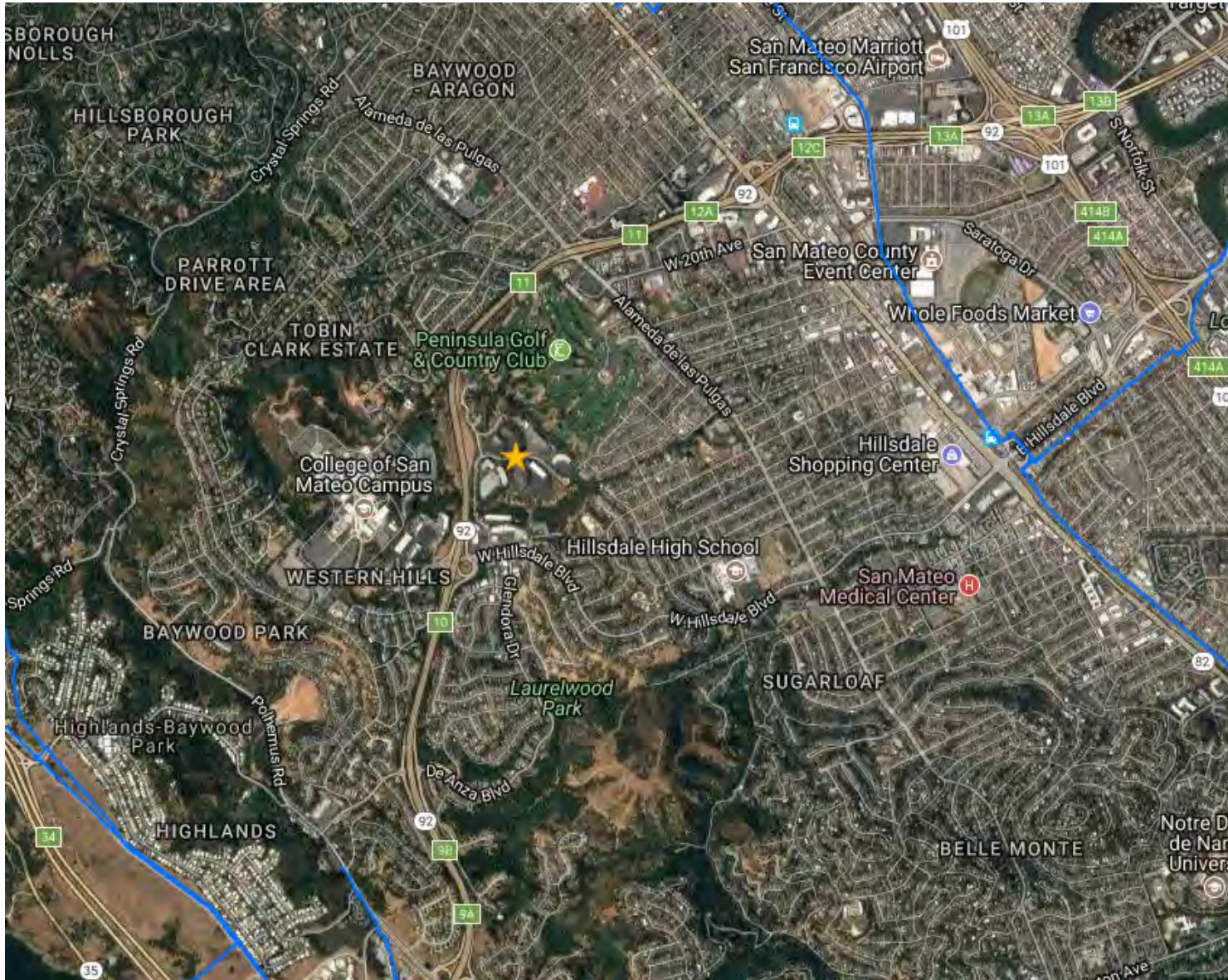
May 2, 2018

## Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

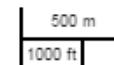
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



## Legend

- Accidents (Liquid)
- Incidents (Gas)
- LNG Plants
- Breakout Tanks
- Gas Transmission Pipelines
- Hazardous Liquid Pipelines



Pipelines depicted on this map represent gas transmission and hazardous liquid lines only. Gas gathering and gas distribution systems are not represented.

This map should never be used as a substitute for contacting a one-call center prior to excavation activities. Please call 811 before any digging occurs.

Questions regarding this map or its contents can be directed to npms@dot.gov.

Projection: Geographic

Datum: NAD83

Map produced by the Public Viewer application at [www.npms.phmsa.dot.gov](http://www.npms.phmsa.dot.gov)

Date Printed: May 02, 2018



Quality. Service. Value.<sup>®</sup>



## 2016 Water Quality Report

Bayshore District  
San Mateo

Este informe contiene información muy importante sobre su agua potable.  
Tradúzcalo o hable con alguien que lo entienda bien.



# 2016 Water Quality Table

(Continued)

Microbiological	Year Tested	Unit	MCL (SMCL)	PHG (MCLG)	In Compliance	Range	Average	Source of Substance
Total coliform (systems with >40 samples/month) (Total Coliform Rule)	2016	positive samples	5%	(0)	Yes	ND	ND	Naturally present in the environment
Giardia lamblia <sup>5</sup>	2016	cyst/L	TT	0	Yes	ND–0.08	0.01	Naturally present in the environment

## Other Regulated Substances

Metals	Year Tested	Unit	AL	PHG (MCLG)	In Compliance	90 <sup>th</sup> Percentile	Samples > AL	Source of Substance
Copper	2016	ppm	1.3	0.3	Yes	ND	0 of 31	Internal corrosion of household plumbing systems; erosion of natural deposits; leaching from wood preservatives
Lead	2016	ppb	15	0.2	Yes	ND	0 of 31	Internal corrosion of household plumbing systems; discharge from industrial manufacturers; erosion of natural deposits

<sup>5</sup>Giardia lamblia samples were collected from pretreated water. Giardia lamblia is inactivated through treatment technique.

## **Appendix E**

### **Interviews**



RECORD OF CONVERSATION ( ) MEETING (X)	
TARGUS PROJECT NO.: T18-3719	CONTACT: Ms. Krista M. Dixon / Mr. Gary Wilson
DATE: May 10, 2018	COMPANY: Hudson Pacific Properties
TIME: 0905	TITLE: Portfolio Manager / Key Site Manager
TARGUS CONTACT: Tommy Kim	PHONE: 650-280-4821
CONCERNING: On-Site Interview	

Ms. Dixon was present during the site reconnaissance. Ms. Dixon stated she had been associated the subject property for nine months. Ms. Dixon stated that she had good knowledge pertaining to the administrative activities associated with the subject property. However, for site-specific operations and maintenance issues, Ms. Dixon referred Targus to speak with Mr. Gary Wilson the Chief Engineer. Ms. Dixon considered herself the Key Site Manager.

No information regarding AULs, environmental liens or governmental notification relating to past or current violations of environmental laws with respect to the subject property were reported to Targus during this interview. Ms. Dixon was not aware of (1) any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property; or (2) any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on or from the subject property.

As noted above, Ms. Dixon referred Targus to Mr. Wilson, who escorted Targus during the site reconnaissance. Mr. Wilson stated that he has been associated with the subject property for approximately 40 years and that he had good knowledge of the uses and physical characteristics of the subject property.

Mr. Wilson provided the following information:

- There are 10 hydraulic elevators and one traction elevator at the subject property. With regards to the hydraulic systems, Mr. Wilson was not aware of incidents related to equipment malfunction or fluid loss. The elevators reportedly functioned properly and are serviced by Ameritex Elevator Service.
- Stormwater that enters the roof drains and storm drains at the subject property discharges to the storm sewer.
- Sump pumps are located in Peninsula Office Park (POP) 3, 4, 5, and 8. The sumps collect surface water and discharge to the sanitary sewer. The sumps do not collect groundwater. There reportedly are no groundwater infiltration issues in the buildings.
- POP 9 is the only building that has a cooling tower. The remaining buildings are equipped with evaporation condenser units.
- There are no petroleum product or hazardous substance USTs. There are no wells on-site.
- There are two generators on the subject property (specifically, adjacent to POP 8 and 9). The POP 8 generator belongs to Verizon and was equipped with an approximate 100-gallon sub-base tank containing diesel. The POP 9 generator belongs to the landlord for life/ safety emergency use and was equipped with an approximate 130-gallon sub-base tank containing diesel.
- Natural gas and electricity were supplied to the subject property by PG&E.
- There are no reported incidents involving mold or moisture intrusion.
- Water was supplied by California Water Services.
- Sanitary sewer services were managed by the county.
- Pest control and landscape services are contracted with Crane and Bright View, respectively. The contractors do not store their chemicals or equipment on-site.
- Nalco provided water treatment chemicals and services to the on-site chiller and condenser systems.



### RECORD OF CONVERSATION (X) MEETING 0

Date: May 15, 2018

Job Name / #: T18-3719 Peninsula Office Park

Recorded By: David Short

Owner / Client: Invesco

Talked With: Chris Aissa

Of: AmeriTex Elevator Service

Position: Account Manager

Phone: 650-339-2474

Main Subject: Elevator Construction & Maintenance

Targus interviewed Mr. Chris Aissa, sales account manager for AmeriTex Elevator Service, regarding details of elevator construction as well as maintenance schedule and service calls for the ten hydraulic elevators at the subject property. Mr. Aissa confirmed that the elevators at the subject property were installed between 1974 and 1998 by the manufacturers of the elevators (Otis, Schindler & Westinghouse). Mr. Aissa described the construction of the elevator as having a subsurface piston shaft which included a PVC sleeve and a double-capped bottom. Mr. Aissa said that to his knowledge the elevators had not experienced leaks associated with piston seals and that other than the routine maintenance no other service calls had been requested for the subject property. In addition, Mr. Aissa confirmed that the elevators were routinely maintained (monthly) by AmeriTex under a service contract.

## David Short

---

**From:** San Mateo Public Records Center <sanmateoca@mycusthelp.net>  
**Sent:** Monday, May 07, 2018 4:15 PM  
**To:** David Short  
**Subject:** Public Records Request :: W001444-050718



Thank you for your interest in public records of the City of San Mateo. Your request was received by the City of San Mateo on 5/7/2018 and given the reference number **W001444-050718** for tracking purposes.

Record(s) Requested: **Targus is currently performing a Phase I Environmental Site Assessment in San Mateo and would like to request information for the following addresses (they are all part of the Peninsula Office Park): 2655 Campus Drive, San Mateo CA 94403 2755 Campus Drive, San Mateo CA 94403 2800 Campus Drive, San Mateo CA 94403 2929 Campus Drive, San Mateo CA 94403 2955 Campus Drive, San Mateo CA 94403 2988 Campus Drive, San Mateo CA 94403 Your assistance and file information for this address is requested to identify potential sources of environmental concern that may have occurred. Such information may consist of fuel or chemical storage activities, emergency responses to fires, hazardous material responses, spills, and/or releases or observations noted during routine fire inspections. We appreciate your help with this project. Please contact David Short by telephone at (972) 247-7229 or via email at dshort@targusassociates.com or facsimile at (972) 247-7810 with any questions or comments regarding this inquiry. Thank you for your time. Sincerely, Targus Associates, LLC**

The request is being forwarded to appropriate department(s) for processing.

Monitor request progress at the link below. The City will email you when the request is complete. Thank you for using the San Mateo Records Center.

---

To monitor the progress or update this request please log into the [San Mateo Records Center](#).

**David Short**

---

**From:** San Mateo Public Records Center <sanmateoca@mycusthelp.net>  
**Sent:** Thursday, May 10, 2018 1:09 PM  
**To:** David Short  
**Subject:** California Public Records Request :: W001444-050718

**Attachments:**

[2655 Campus Drive.pdf](#)

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of May 07, 2018, **Reference # W001444-050718**

Dear Mr./Ms. Short,

The City received the following request from you on May 07, 2018.

**Targus is currently performing a Phase I Environmental Site Assessment in San Mateo and would like to request information for the following addresses (they are all part of the Peninsula Office Park):**

**2655 Campus Drive, San Mateo CA 94403  
2755 Campus Drive, San Mateo CA 94403  
2800 Campus Drive, San Mateo CA 94403  
2929 Campus Drive, San Mateo CA 94403  
2955 Campus Drive, San Mateo CA 94403  
2988 Campus Drive, San Mateo CA 94403**

**Your assistance and file information for this address is requested to identify potential sources of environmental concern that may have occurred. Such information may consist of fuel or chemical storage activities, emergency responses to fires, hazardous material responses, spills, and/or releases or observations noted during routine fire inspections.**

**We appreciate your help with this project. Please contact David Short by telephone at (972) 247-7229 or via email at [dshort@targusassociates.com](mailto:dshort@targusassociates.com) or facsimile at (972) 247-7810 with any questions or comments regarding this inquiry. Thank you for your time.**

**Sincerely,**  
**Targus Associates, LLC**

Please see attached incident report for the property at 2655 Campus Drive. We do not have any other outstanding incidents or potential sources of environmental concern on any other properties. You may want to contact County Environmental Health to get any other information they can provide

If you have any questions, please contact me. Thank you for your attention.

Sincerely,

Mary Way  
Office Assistant  
Fire  
650-522-7940

---

To monitor the progress or update this request please log into the [San Mateo Records Center](#).

# Belmont / Foster City / San Mateo Fire Incident Report

## Incident

Incident #	2017-0006474-000
Status	Closed
Incident Type	160 - Special outside fire, other
Station	27
Address	2655 CAMPUS DR
City, State ZipCode	San Mateo, CA 94401
Location	1 - Street address
Mutual Aid	N - None
Alarm Date/Time	06/12/2017 20:55:28
Arrival Date/Time	06/12/2017 20:59:00
Controlled Date/Time	06/12/2017 21:06:00
Cleared Date/Time	06/12/2017 22:24:59
Shift	C
Alarms	1
District	27
Action Taken1	10 - Fire control or extinguishment, other
Property Loss	\$2,000.00
Content Loss	\$70.00
Property Value	\$2,000.00
Content Value	\$70.00
Property Use	965 - Vehicle parking area
Officer In Charge	S20798 - Eitel Calvin E. Fire Captain
Officer Assignment	1 - Fire suppression, included are HazMat, rescue, IC
Officer Date	06/12/2017

## Resources

### Unit: BC5

Unit Type	92 - Chief officer car
Dispatch Date/Time	06/12/2017 21:23:25
Enroute Date/Time	06/12/2017 22:03:14
Arrival Date/Time	06/12/2017 21:31:42
Cleared Date/Time	06/12/2017 22:03:14
Unit Report By	F82044 - Goodwin Chuck Battalion Chief

**Unit: BC5**

Action Taken1	86 - Investigate
Priority Arrival	Code 2
From Quarters	No
Narrative	<p>BC5 was dispatched to this incident at 21:23 hours. We arrived on scene at 21:31 hours. The primary task performed by our company was investigation.</p> <p>BC5 responded to assist E27 with a fire at a construction site where a porta-toilet burned up. BC5 requested an investigator and stayed on scene until her arrival. BC5 then cleared the scene.</p>

**Personnel (2) - Unit: BC5**

Personnel	BL310 - Thorne Jeff Captain
Personnel	BC6 - MutualAid

**Unit: E27**

Unit Type	11 - Engine
Dispatch Date/Time	06/12/2017 20:55:28
Enroute Date/Time	06/12/2017 20:56:45
Arrival Date/Time	06/12/2017 20:59:00
Cleared Date/Time	06/12/2017 21:40:41
Unit Report By	S20798 - Eitel Calvin E. Fire Captain
Action Taken1	11 - Extinguishment by fire service personnel
Priority Arrival	Code 3
From Quarters	Yes
Narrative	<p>At 20:55 hours on Monday, June 12, 2017 (C-Shift), we responded to special outside fire. E27, the first unit to arrive, was on scene at 20:59 hours (Code 3). The last unit cleared the scene at 22:24 hours.</p>

The incident occurred at 2655 CAMPUS DR San Mateo (AT THE BOTTOM OF CAMPUS) in District 27. This location can be referenced on maps 2651 and (TB) 748:J5. The primary station for this address is 27 (1801 De Anza Blvd San Mateo). E-27 arrived to find a porta-potty on fire in an outside fenced construction debris area in the parking lot of 2655 Campus Drive. Co. 27 used the bumper line to extinguish it as San Mateo Police Officer Brazil arrived. B/C 5 was advised and he arrived and called for a fire inspector. The security Guard Richard Lohman, 510-358-1876, from Securitas arrived and stated he had patrolled the area about 20 minutes prior and there was no fire, however, he noted a white Honda was leaving the parking lot as he was entering. E-27 was secured and returned to service. B/C 5 stayed on scene until Fire Inspector Martin arrived and did her investigation. For further info see B/C 5's report, Inspector Martin's report and San Mateo Police Officer Brazil's report.

**Personnel (3) - Unit: E27**

Personnel	S20798 - Eitel Calvin E. Fire Captain
Personnel	S24618 - Hogan Craig J. Firefighter Engineer
Personnel	S26165 - Cowger Corey D. Firefighter Engineer

**Unit: PR5C**

Unit Type	92 - Chief officer car
Dispatch Date/Time	06/12/2017 21:24:43
Enroute Date/Time	06/12/2017 22:24:59
Arrival Date/Time	06/12/2017 21:59:44
Cleared Date/Time	06/12/2017 22:24:59
Unit Report By	S27607 - Martin Melinda Fire Inspector
Action Taken1	86 - Investigate
Priority Arrival	Code 2
From Quarters	No
Narrative	PR5C was dispatched to this incident at 21:24 hours. We arrived on scene at 21:59 hours. The primary task performed by our company was investigation. See attached PDF for report.

**Personnel (1) - Unit: PR5C**

Personnel	S27607 - Martin Melinda Fire Inspector
-----------	--

**Wildland Fire**

Wildland Fire Cause	7 - Incendiary
Heat Source	UU - Undetermined
Factors Contributing to Ignition1	00 - Factors contributing to ignition, other
Fire Suppression Factors1	200 - Act or omission, other
Area Type	3 - Rural/urban or suburban
Equipment Involved In Ignition	000 - Other equipment involved in ignition
Total Acres Burned	0.01

---

# SAN MATEO/FOSTER CITY/BELMONT FIRE DEPARTMENT

## FIRE INVESTIGATION REPORT

N#2017-0006474-000

6-12-2017

2655 Campus Drive, San Mateo

Structure Fire

1 **References:** Captain Cal Eitel's report for incident 2017-0006474-000 and San Mateo Police  
2 Department case 170612018.

3 **Cause:** Incendiary

4  
5 **Conditions:** The weather was partly cloudy with wind coming out of the West at approximately 18 mph.  
6 The mean temperature averaged 55 degrees Fahrenheit and the humidity was approximately 77%  
7 (obtained from Weather Underground).

8  
9  
10 **Synopsis:** The fire occurred in the parking lot of 2655 Campus Drive in San Mateo at 2055  
11 hours. I was paged to the incident by Public Safety Communications from home at 2124  
12 hours. I arrived on scene at approximately 2159 hours. The fire occurred in a fenced-in  
13 construction area in the parking lot of an office building. Inside were portable toilets and a hand  
14 washing station. The hand washing station and a portable toilet were damaged by the fire.

15  
16 **Police Department:** A San Mateo Police Officer responded to the scene (Officer Brazil, Badge 136).  
17 He made a report with a case number of 170612018.

18  
19 **Evidence/Photos:** 10 color photographs were taken by Investigator Melinda Martin with a Canon  
20 PowerShot ELPH 170IS digital camera. All files were transferred to the Fire Investigation "Q" drive and  
21 then deleted from the camera.

22  
23 **Details of Investigation:**

24  
25 **Examination:** I began my investigation of the scene by conducting a 360-degree inspection around the  
26 area of origin. A chain link fence surrounded the area of origin and was covered by black netting. The  
27 fenced-in area was approximately 20 feet by 50 feet in size. No incendiary devices were found around  
28 the chain link fence. On the Southeast side of the fencing, a section of the black netting was burned away  
29 from the chain links of the fence (IMG\_291). This area was next to a hand washing station which could  
30 be seen through the fence. On the Northeast side, three-quarters of the black netting had burned away  
31 (IMG\_289). A portable toilet and hand washing station were located next to the fence in this area. The  
32 entrance to the area of origin was located on the Northeast/Northwest corner of the fencing. The fence  
33 had not been locked or secured (IMG\_293).

34  
35 I entered the area of origin inside the fence line and found a large amount of melted plastic debris on the  
36 ground to the left (IMG\_294). Burned paper towels were visible in the melted plastic debris which was a  
37 grayish color (IMG\_295). Two portable toilets and a hand washing station were located in the area of  
38 origin.

39  
40 Toilet #2 was undamaged and was not secured or locked (IMG\_298). Toilet number #2 was located to  
41 the left along the Southeast fence line.

42  
43 Next to Toilet #2 was a portable hand washing station. The hand washing station was to the left of Toilet  
44 #2 in the Northeast corner of the area of origin. The paper towel dispenser was oriented facing the  
45 entrance to the fenced-in area (area of origin) and Toilet #1. The sink area of the hand washing station  
46 was melted away by the heat from the fire (IMG\_296). The paper towel dispenser above the sink area  
47 was still intact. Burned paper towels were visible inside the towel dispenser and on the ground below.

48  
49 Toilet #1 sustained the most fire damage and was the point of origin. Toilet #1 had been composed of a  
50 grayish plastic material and had melted down to the ground, creating the melted plastic debris on the

**SAN MATEO/FOSTER CITY/BELMONT FIRE DEPARTMENT**  
**FIRE INVESTIGATION REPORT**

N#2017-0006474-000

6-12-2017

**2655 Campus Drive, San Mateo**

**Structure Fire**

51 ground (see lines 34/35). In the middle of the melted remains of Toilet #1 was a heavily burned toilet  
52 paper roll and an aluminum soda can (IMG\_297). There were no contents inside the soda can.

53

54 **Statements:**

55 **W1: Captain Cal Eitel – Engine 27 – first on scene**

56 I spoke with W1 Captain Eitel who responded to the fire. When Engine 27 arrived, flames were seen  
57 actively burning on Toilet #1. At this point, the toilet had melted to the ground. There were no locks or  
58 security devices on the entrance point into the fenced-in area. No one was in the area when Engine 27  
59 arrived.

60

61 **W2: Richard Lohman – PH: 510-358-1876 - Securitas employee (security officer)**

62 I spoke with San Mateo Police Officer Kevin Brazil who gave me W2 Lohman's statement. I was unable  
63 to contact W2 Lohman (W2 Lohman had left the scene, refer to San Mateo Police report, case  
64 170612018). W2 Lohman had been patrolling the area when he entered the parking lot of 2655  
65 Campus Drive. As he entered, he noticed a white Honda vehicle leaving the parking lot. The person  
66 was not able to be identified.

67

68 **W3: James Schroeder – employee of management**  
69 **company (Hudson Pacific Properties)**

70 I spoke with W3 Schroeder who was on site. He stated the fenced-in construction area was never  
71 locked and anyone had free access.

72

73 **Conclusion & Opinion:** The area of origin of the fire was the fenced-in construction area with the  
74 point of origin being Toilet #1. No sources of ignition were found in the area of origin which could cause  
75 the portable toilet and hand washing station to ignite.

76

77 I cannot rule out incendiary activity as a cause of this fire. Statements from W2 Lohman place an  
78 individual at the scene of the fire when it was burning. The fence was not locked or secured making  
79 the area inside accessible for foul play.

80

81 This fire is ruled as incendiary.

82

83 The formation of the above conclusion is based upon the existence, maintenance and utilization of  
84 relevant NFPA and ASTM codes, standards, guidelines or recommended practices when possible.  
85 This literature has widespread acceptance in the scientific community. The hypotheses presented  
86 have withstood all appropriate challenges while all reasonable alternatives to the hypotheses have  
87 been considered and eliminated due to their failure to withstand a valid challenge.

88

89 **END OF REPORT**

90

91

92

93 Melinda Martin  
94 Fire Investigator

95

96 Melinda Martin 6/21/2017

97

98

99

100

Reviewed by  
Deputy Fire Marshal



## David Short

---

**From:** San Mateo Public Records Center <sanmateoca@mycusthelp.net>  
**Sent:** Wednesday, May 09, 2018 9:00 AM  
**To:** David Short  
**Subject:** Public Records Request :: W001451-050918



Thank you for your interest in public records of the City of San Mateo. Your request was received by the City of San Mateo on 5/9/2018 and given the reference number **W001451-050918** for tracking purposes.

Record(s) Requested: **Targus is currently performing a Phase I Environmental Site Assessment in San Mateo and would like to request information for the following addresses: USPS - 2700 Campus Drive, San Mateo CA 94403 Holiday Cleaners - 3166 Campus Drive, San Mateo CA 94403 Your assistance and file information for this address is requested to identify potential sources of environmental concern that may have occurred. Such information may consist of fuel or chemical storage activities, emergency responses to fires, hazardous material responses, spills, and/or releases or observations noted during routine fire inspections. We appreciate your help with this project. Please contact David Short by telephone at (972) 247-7229 or via email at dshort@targusassociates.com or facsimile at (972) 247-7810 with any questions or comments regarding this inquiry. Thank you for your time. Sincerely, Targus Associates, LLC**

The request is being forwarded to appropriate department(s) for processing.

Monitor request progress at the link below. The City will email you when the request is complete. Thank you for using the San Mateo Records Center.

---

To monitor the progress or update this request please log into the [San Mateo Records Center](#).

## David Short

---

**From:** San Mateo Public Records Center <sanmateoca@mycusthelp.net>  
**Sent:** Monday, May 14, 2018 12:54 PM  
**To:** David Short  
**Subject:** California Public Records Request :: W001451-050918

--- Please respond above this line ---



RE: PUBLIC RECORDS REQUEST of May 09, 2018, Reference # **W001451-050918**

Dear Mr./Ms. Short,

The City received the following records request from you on May 09, 2018.

**Targus is currently performing a Phase I Environmental Site Assessment in San Mateo and would like to request information for the following addresses:**

**USPS - 2700 Campus Drive, San Mateo CA 94403**

**Holiday Cleaners - 3166 Campus Drive, San Mateo CA 94403**

**Your assistance and file information for this address is requested to identify potential sources of environmental concern that may have occurred. Such information may consist of fuel or chemical storage activities, emergency responses to fires, hazardous material responses, spills, and/or releases or observations noted during routine fire inspections. We appreciate your help with this project. Please contact David Short by telephone at (972) 247-7229 or via email at [dshort@targusassociates.com](mailto:dshort@targusassociates.com) or facsimile at (972) 247-7810 with any questions or comments regarding this inquiry. Thank you for your time. Sincerely, Targus Associates, LLC**

Responsive records are available via the San Mateo Records Request Portal. Select the link below to view your request. I would also recommend contacting the San Mateo County Office of Environmental Health to check their records for additional information.

<https://ehesubmit.smchealth.org/servlet/guest?service=0&formId=88&saveAction=2&enterprise=9>

If you have any questions, or wish to discuss this further, please contact me.

Sincerely,

Aleta Cook  
Administrative Assistant  
Fire  
650-522-7940

---

To monitor the progress or update this request please log into the [San Mateo Records Center](#).

## David Short

---

**From:** David Short  
**Sent:** Wednesday, May 09, 2018 1:41 PM  
**To:** 'envhealth@smcgov.org'  
**Subject:** Records Request

Targus is currently performing a Phase I Environmental Site Assessment in San Mateo, CA and would like to request information for the following addresses (all part of the Peninsula Office Park):

**2655 Campus Drive, San Mateo CA 94403**  
**2755 Campus Drive, San Mateo CA 94403**  
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Sincerely,  
Targus Associates, LLC

## David Short

---

**From:** HS\_EH\_EnvHealth <EnvHealth@smgov.org>  
**Sent:** Thursday, May 10, 2018 4:32 PM  
**To:** David Short  
**Subject:** RE: Records Request

Hello,

Please submit your file review request using the following link <http://smchealth.org/ehfilereview>

Best regards,

**SAN MATEO COUNTY  
ENVIRONMENTAL HEALTH**  
2000 Alameda de las Pulgas, Suite 100  
San Mateo, CA 94403  
Phone: (650) 372-6200  
Fax: (650) 627-8244  
Email: [envhealth@smgov.org](mailto:envhealth@smgov.org)



---

**From:** David Short [mailto:DShort@targusassociates.com]  
**Sent:** Wednesday, May 09, 2018 11:41 AM  
**To:** HS\_EH\_EnvHealth <EnvHealth@smgov.org>  
**Subject:** Records Request

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## David Short

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**Sent:** Wednesday, May 09, 2018 1:41 PM  
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Sincerely,  
Targus Associates, LLC

1900 Diplomat Drive  
Dallas, TX 75234  
Phone: (972) 247-7229  
Fax: (972) 247-7810



# Fax Transmission

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**To:** FOIA Agent                    **From:** David Short

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**Company:** DTSC Berkeley Office                    **Project:** T18-3719

---

**Fax:** (510) 540-3738                    **Date:** 5/9/2018

---

**Phone:** (510) 540-2122                    **Pages:** 1

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**Re:**    **CC:**

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**Urgent**     **For Review**     **Please Comment**     **Please Reply**     **Please Recycle**

---

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Sincerely,  
Targus Associates, LLC

David Short  
Project Professional

1900 Diplomat Drive  
Dallas, TX 75234  
Phone: (972) 247-7229  
Fax: (972) 247-7810



# Fax Transmission

**To:** FOIA Agent **From:** David Short

---

**Company:** DTSC Berkeley Office **Project:** T18-3719

---

**Fax:** (510) 540-3738 **Date:** 5/9/2018

---

**Phone:** (510) 540-2122 **Pages:** 1

---

**Re:** **CC:**

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**Urgent**  **For Review**  **Please Comment**  **Please Reply**  **Please Recycle**

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Sincerely,  
Targus Associates, LLC

A handwritten signature in blue ink that reads "David Short".

David Short  
Project Professional

## David Short

---

**From:** David Short  
**Sent:** Wednesday, May 09, 2018 9:51 AM  
**To:** PubRecReq@waterboards.ca.gov  
**Subject:** Records Request

Good morning.

Targus is currently performing a Phase I Environmental Site Assessment in San Mateo, CA and would like to request information for the following addresses (all part of the Peninsula Office Park):

**2655 Campus Drive, San Mateo CA 94403**  
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Sincerely,  
Targus Associates, LLC

David Short  
Project Professional

## David Short

---

**From:** David Short  
**Sent:** Wednesday, May 09, 2018 9:53 AM  
**To:** 'PubRecReq@waterboards.ca.gov'  
**Subject:** Records Request

Targus is currently performing a Phase I Environmental Site Assessment in San Mateo, CA and would like to request information for the following addresses:

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Sincerely,  
Targus Associates, LLC



David Short  
Project Professional

## David Short

---

**From:** David Short  
**Sent:** Wednesday, May 09, 2018 9:13 AM  
**To:** 'Jessica.Diedesch@calepa.ca.gov'  
**Subject:** Records Request

Good Morning.

Targus is currently performing a Phase I Environmental Site Assessment in San Mateo, CA and would like to request information for the following addresses (all part of the Peninsula Office Park):

**2655 Campus Drive, San Mateo CA 94403**  
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Sincerely,  
David Short  
Targus Associates, LLC

## David Short

---

**From:** David Short  
**Sent:** Wednesday, May 09, 2018 9:58 AM  
**To:** 'Jessica.Diedesch@calepa.ca.gov'  
**Subject:** Records Request

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Sincerely,  
Targus Associates, LLC

## **Appendix F**

### **Qualifications of Environmental Professionals**

**DAVID SHORT**  
**Project Professional, Environmental Services**

**EDUCATION**

Bachelor of Science, Biology, Texas Tech University, 2008

**PROFESSIONAL REGISTRATIONS, CERTIFICATIONS AND TRAINING**

Leaking Petroleum Storage Tank PM #0000521

Certified OSHA 40-Hour Hazardous Waste Operations

**CAREER SUMMARY**

Mr. Short entered the environmental field in October 2008 in pursuit of a career as an environmental professional. He has undergone and continues to undergo specialized training in order to perform thorough Phase II investigations, remediation projects and associated consulting services.

**REPRESENTATIVE PROJECTS**

**PHASE II LIMITED SUBSURFACE INVESTIGATION**

Mr. Short has been involved with numerous Phase II Environmental Site Assessments on properties that have been identified as potentially impacted by adverse environmental conditions, including dry cleaning solvents and other volatile organic compounds, metals, and petroleum hydrocarbons. These projects included the collection of soil, groundwater, and soil vapor samples from the identified sites for laboratory analyses, followed by making recommendations based on comparison of laboratory data to regulatory action limits, contaminants of concern, and extent of contamination.

**SOIL & GROUNDWATER REMEDIATION**

Mr. Short has been involved with numerous Remediation projects on sites requiring environmental action for soil and/or groundwater clean-up. Mr. Short has extensive experience in various types of remedial approaches, including both fixed-system and mobile dual-phase extraction vacuum (MDPE), dig-and-haul remediation, pump-and-treat remediation, in-situ and bioremediation. In addition, these projects require an acute awareness of various state action levels for various contaminants, disposal requirements of multiple waste streams, as well as a firm understanding of project management and compliance requirements.

**PETROLEUM STORAGE TANK (PST) COMPLIANCE**

Mr. Short has performed many (hundreds) of compliance inspections and offered compliance guidance for PST entities/gas stations. These inspections include the visual inspection, maintenance, repair, clean-out, monitoring, and waste disposal of PST-related equipment including spill buckets, turbine sumps, dispenser sumps, Stage 1 & Stage II vapor recovery systems, probe risers and cathodic protection systems. In addition, Mr. Short has been involved with dozens of tank removal and tank installation projects, as well as fuel-line replacement or redirection projects.

**PHASE I ENVIRONMENTAL SITE ASSESSMENTS (ESAs)**

Mr. Short has assessed various property types including vacant, industrial, office buildings and commercial/retail facilities. Projects have included additional services relating to lead-based paint, drinking water quality, potential historical impact, wetlands, endangered species, indoor air quality/ mold, radon, regulatory compliance, oil and gas activity and flood plain designation. Responsibilities have incorporated technical oversight, project coordination, and regulatory agency interaction in Texas.

**KELLY KNIGHT**  
**Project Professional**

## **EDUCATION**

Bachelor of Arts in Environmental Studies, University of North Carolina at Chapel Hill, 2011  
Juris Doctor, University of North Carolina School of Law, 2014

## **PROFESSIONAL REGISTRATIONS, CERTIFICATIONS, AND TRAINING**

- Certified Occupational Safety and Health Administration (OSHA) 40-Hour Hazardous Waste Operations (HAZWOPER)
- American Association of Radon Scientists and Technologists (AARST) National Radon Proficiency Program (NRPP) Residential Measurement Provider
- Phase I Environmental Site Assessment (ESA) Training ASTM E1527-13 & All Appropriate Inquiry

## **CAREER SUMMARY**

Ms. Knight entered the environmental field in July 2015 in pursuit of a career as an environmental professional. She has conducted and assisted senior professionals and principals in conducting multiple Phase I ESAs. She has also compiled data related to radon, asbestos, lead-in-drinking water, and similar environmental due diligence assessments. She has completed specialized training in the performance of Phase I ESAs.

## **REPRESENTATIVE PROJECTS**

### **PHASE I ENVIRONMENTAL SITE ASSESSMENTS**

Ms. Knight has assessed various properties including vacant/undeveloped land, commercial/retail facilities, warehouses, and multifamily apartment complexes. Projects have incorporated additional services relating to potential historical impact, asbestos, wetlands, endangered species, radon, regulatory compliance, and national ambient air quality attainment status. Responsibilities have included training, technical oversight, project coordination, review of regulatory data, regulatory agency interaction, file management, and oversight of report and appendix materials.

### **PHASE II ENVIRONMENTAL SITE ASSESSMENTS**

Ms. Knight has been involved with numerous Phase II Environmental Site Assessments on properties that have been identified as potentially impacted by adverse environmental conditions, including dry cleaning solvents and other volatile organic compounds, metals, and petroleum hydrocarbons. These projects included the collection and oversight of soil, groundwater, and soil vapor samples during sampling events from the identified sites for laboratory analyses.

**ELIZABETH BARGAR, P.G.**  
**Senior Professional**

**EDUCATION**

Master of Science in Geology, Vanderbilt University  
Bachelor of Arts in Geology, The College of Wooster

**PROFESSIONAL REGISTRATIONS, CERTIFICATIONS AND TRAINING**

Professional Geologist, Texas and Louisiana  
Texas Asbestos Inspector and Management Planner  
Texas Corrective Action Project Manager

**CAREER SUMMARY**

Ms. Bargar has more 25 years of experience in environmental consulting. She has conducted and supervised Environmental Site Assessments, Asbestos Surveys, Underground Storage Tank Removals, Site Contamination Assessments, Site Remediation Programs, Stormwater Pollution Prevention Plans, and Due Diligence surveys for Commercial Real Estate and Oil and Gas properties across the United States. She has worked on projects involving several state voluntary cleanup programs. Her responsibilities included technical review as a Principal Geologist, project management, and business development.

**REPRESENTATIVE PROJECTS**

**Phase I Environmental Site Assessments** - Ms. Bargar has managed and performed environmental site assessments on diverse properties across the country. These projects have included portfolios of commercial and industrial sites with expedited completion schedules. Her responsibilities have included technical oversight, project coordination, and regulatory agency interaction in several states.

**Phase II Environmental Assessments** - Ms. Bargar managed the completion of Phase II Environmental Site Assessments on properties identified to have *recognized environmental conditions* during the completion of Phase I ESAs. This information was used to assess business environmental risk associated with the purchase of the properties. Ms. Bargar managed the assessment activities required to characterize the magnitude and extent of contamination in order to complete an "Affected Property Assessment Report" (APAR) in accordance with Texas Risk Reduction Program regulations.

**Underground Storage Tanks** - Ms. Bargar managed and performed environmental consulting services associated with the identification and removal of underground storage tanks at several properties. The scope of services typically included completion of an environmental site assessment of the property in which the UST was identified, interaction with regulatory agencies to facilitate the removal of the tank, coordination with the tank removal contractor, performance of confirmatory soil sampling and laboratory analysis, and completion of the required submittals to the state regulatory agency.

**Voluntary Cleanup Program Assessments** - Ms. Bargar provided technical oversight and project management for the completion of Site Investigations, Response Action Work Plans, response action implementation, and Response Action Completion Reports for several sites.

*Elizabeth Bargar, P.G. (continued)*

**Asbestos Surveys** - Ms. Bargar has performed comprehensive asbestos surveys for clients intending to renovate or demolish structures on a property. She has managed asbestos abatement projects on behalf of clients. She has also performed limited asbestos surveys as an additional service to Phase I ESAs.

**Stormwater/Wastewater** - Ms. Bargar participated in the preparation of Stormwater Pollution Prevention Plans for several vehicle maintenance facilities in North Texas and Oklahoma. The project included performing on-site compliance evaluations, providing recommendations to address areas of non-compliance, development of Best Management Practices (BMPs), and providing assistance with implementation of the plans.

**SAMUEL JOHNSON, P.G.  
Principal, Senior Professional**

**EDUCATION**

Doctor of Philosophy in Soil Physics, Texas A&M University, 1989  
Master of Science in Geography, Texas A&M University, 1985  
Bachelor of Science in Geology, Lamar University, 1983

**PROFESSIONAL REGISTRATIONS, CERTIFICATIONS AND TRAINING**

Professional Geologist: TN (1478), GA (1123), TX (1000), AL (1272)  
Professional Soil Scientist: TX (6777)  
PST Corrective Action Project Mgr: TX (PM 73)

**CAREER SUMMARY**

Mr. Johnson has 20 years experience in environmental research and consulting. He has conducted, supervised, and reviewed thousands of Phase I and II Environmental Site Assessments and completed comprehensive assessments, including mold, IAQ and PCAs, of hundreds of properties. He has supervised, managed, planned, and executed a broad range of non-due diligence environmental projects including: site contamination, migration and fate assessments; hazardous and solid waste management and facility permitting; RFIs and hazardous waste unit closures/upgrades; corrective action planning and implementation; emergency spill planning, response and remediation; environmental regulatory compliance assessments of industrial and institutional facilities; pre-transaction environmental site assessments, and litigation support. These projects have been conducted for petroleum, petrochemical, plastics, and automotive manufacturing businesses, commercial, local government, health care and other institutional clients.

**REPRESENTATIVE PROJECTS**

**Mixed-Use Redevelopment of Industrial Site, San Jose, CA** – Phase I ESA, extensive regulatory agency file review and peer review of prior and ongoing assessment and risk assessment services. Multi-family and retail development was planned for the former 330-acre electronics manufacturing facility previously operated by Hitachi and IBM. Conditions evaluated included soil and groundwater contamination with chlorinated solvents, associated remediation, human health risk associated with potential future indoor vapor inhalation, and closure under oversight by two state regulatory agencies.

**Alachua County Hospital System, Gainesville, FL** – Phase I ESA, testing for lead, radon, IAQ, asbestos, hazardous wastes, Phase II, AST and UST removal, AST and UST installation. Subject properties included regional acute care hospital, several satellite hospitals, and numerous clinics.

**Trinity River Multi-Use Redevelopment, Dallas, TX** – Phase I ESA, ACM testing, Phase II, remediation, regulatory closure, and land use restriction for non-drinking water. Former industrial property included eight buildings occupying approximately 50 acres between downtown Dallas and the Trinity River.

*Samuel Johnson, PG (continued)*

**Regional Hospital Systems, Salt Lake City, UT; Buffalo/Niagara Falls, NY; Nashville, TN; Conroe, TX; Gainesville, FL; Birmingham, AL; south-central and eastern TN; central GA** – Services included Phase I ESA, testing for lead, radon, IAQ, asbestos, hazardous wastes, life-safety evaluation, and Phase II ESA. Properties included an aggregate of 20 hospital complexes, 25 medical clinics and scores of associated properties.

**Aircraft Components Refurbisher, Dallas, TX** – Phase I ESA and health and safety and environmental compliance assessment. Facility was formerly used for the manufacture and refurbishment of aircraft components and for assembly of underwater sound detection systems for the US Navy. Issues identified and addressed included un-permitted air emissions, improper worker protection, and improper oil, solvent, and hazardous waste storage.

**ADT Automotive, Nationwide** – Phase I ESA and environmental assessments of 40 vehicle auction and transport facilities. Issues addressed included: hazardous waste; air emissions; NPDES/stormwater; USTs; inactive/ uncontrolled hazardous waste site and landfills; and asbestos and PCBs.

**Appendix G**  
**Information Requested From Client**  
**Excerpts from Documents Provided by**  
**Client or Others**

## APPENDIX B USER INFORMATION REQUEST

*In accordance with ASTM E1527-13 (All Appropriate Inquiry) in order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001, the **USER OF THE ASSESSMENT REPORT MUST** provide the following information (if available) to the environmental professional. Failure to provide this information could result in a determination that "all appropriate inquiry" is not complete. The Key Site Manager has good knowledge of the uses and physical characteristics of the property.*

User/Client Info:

Name: **Scott Ballard - Invesco**      Phone No: **972-715-7435**

Address: **2001 Ross Avenue, Suite 3400 Dallas, Texas 75201**

**AAI-Required Information:**

1. Is the **USER** aware of environmental liens (federal, state, tribal, or local) associated with the *property*?  
 No       Yes      If yes, please attach an explanation and copies of environmental lien information.
  
2. Is the **USER** aware of deed restrictions, engineering or institutional controls, or other Activity and Use Limitations (AULs) filed under federal, state, tribal, or local law?  
 No       Yes      If yes, please attach an explanation and copies of AUL information.
  
3. Does the **USER** possess actual or specialized knowledge or experience that is material to potential *recognized environmental conditions*?  
 No       Yes      If yes, please attach an explanation.
  
4. If the property is being purchased, is the purchase price...  
 less than fair market value? **no**  
 more than fair market value? **no**  
 the same as fair market value? **no**  
 relationship to fair market value unknown? **no**

(NOTE: You do not have to disclose the purchase price.)

If the purchase price is *less than* fair market value, is the **USER** aware of reasons, environmental or otherwise, that would explain the differential?

No     Yes    If yes, please provide an explanation. **Not applicable**

5. Is the **USER** aware of commonly known or reasonably ascertainable information that is material to potential *recognized environmental conditions*?

For example: Do you know the past uses of the *property*?  
Do you know of specific chemicals that are present or once were present at the *property*?  
Do you know of spills or other chemical releases that have occurred at the *property*?  
Do you know of chemical cleanups that have occurred at the *property*?)

No       Yes      If yes, please attach an explanation.

6. Does the **USER** possess knowledge of (1) pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the property; (2) pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on or from the property; or (3) notices from governmental entity regarding possible violations of environmental laws or possible liability relating to hazardous substances or petroleum products?

No       Yes      If yes, please attach an explanation.

***Additional Requested Information:***

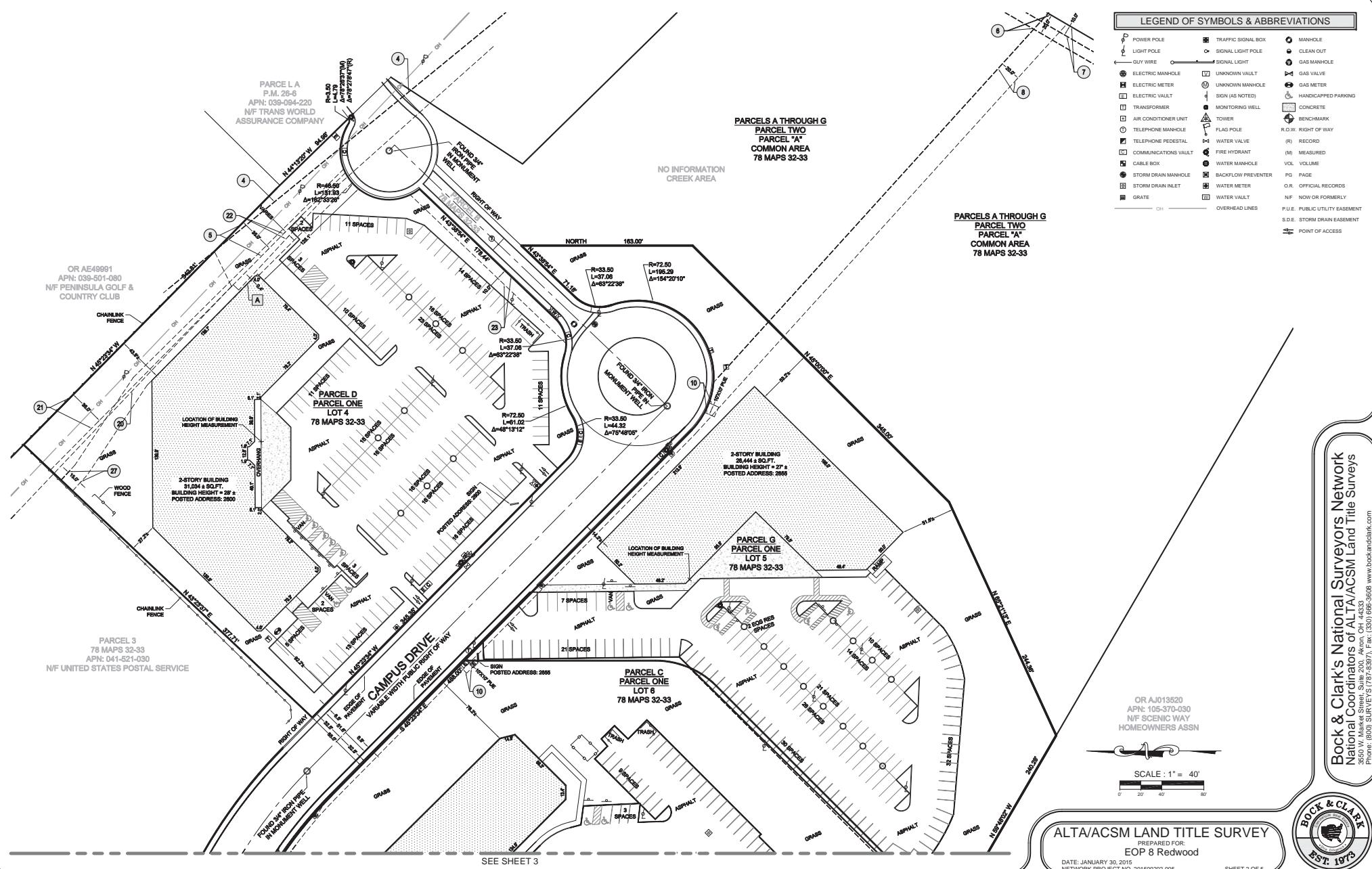
7. What is the **USER'S** reason for having the Phase I Environmental Site Assessment performed?

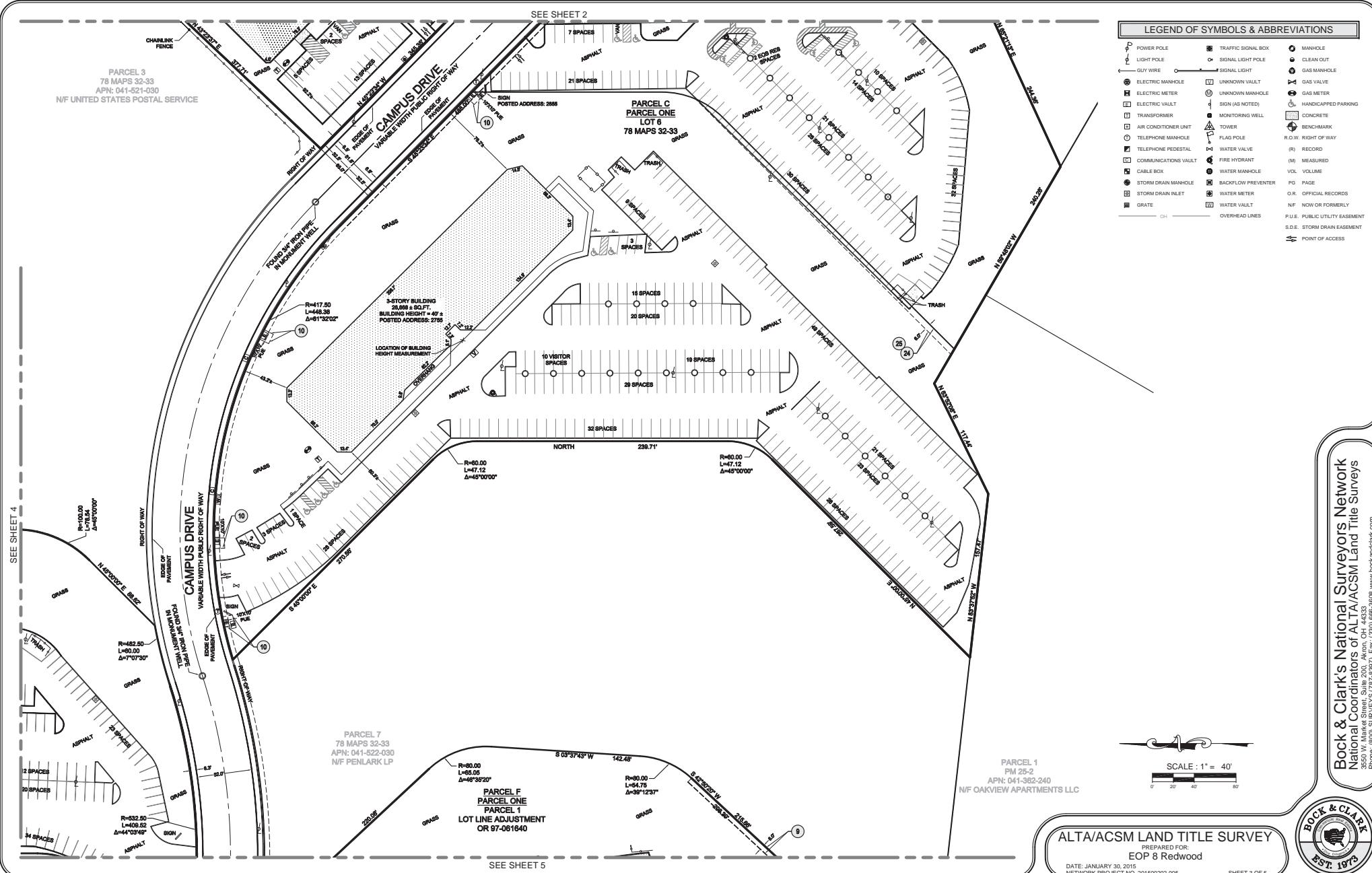
Purchase       Lease       Other (please attach explanation)  
 Sale       Loan

In addition, the following information is needed for the assessment process. Please attach if available.

- (a) Owners name and contact information
- (b) Legal description of property
- (c) Site contact name and phone number
- (d) Tenant list
- (e) Chain-of-title
- (f) Plans and specifications
- (g) Environmental site assessment reports or environmental audit reports
- (h) Environmental permits; underground and above ground storage tank registrations
- (i) Material Safety Data Sheets
- (j) Community right to know plan
- (k) Hazardous waste generator permits, notices, reports
- (l) Asbestos surveys, ACM abatement documentation, O&M Plans
- (m) Geotechnical Studies
- (n) The scope of services desired for the Phase I (including whether parties to the *property* transaction may have a required standard scope of services on whether considerations beyond the requirements of Practice E 1527 are to be considered

*See periodic transmittals of pertinent information as it is received*







SEE SHEET 3

PARCEL 1  
PM 25-2  
APN: 041-362-240  
OAKVIEW APARTMENTS LLC

#### LEGEND OF SYMBOLS & ABBREVIATIONS

4126 OR 242  
STATE OF CALIFORNIA

## CAMPUS DRIVE

**ALTA/ACSM LAND TITLE SURVEY**  
PREPARED FOR:  
FDR & Reduced

DATE: JANUARY 30, 2015  
NETWORK PROJECT NO. 201500202-005

NETWORK PROJECT NO. 201300202-003

SHEETS OF

**Bock & Clark's National Surveyors Network**  
National Coordinators of ALTA/ACSM Land Title Surveys  
200 Market Street, Suite 200, Akron, OH 44333  
Phone: (800) SURVEY (787-8897), Fax: (330) 668-3608 [www.bockandclark.com](http://www.bockandclark.com)





## PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Peninsula Office Park  
2600, 2655, 2755, 2800, 2929, 2955 & 2988 Campus Drive  
San Mateo, California 94403**



**Prepared for:  
Equity Office Properties Trust  
San Mateo, California**

**March 3, 2014  
IVI Project No.: PC40208560**



**IVI Assessment Services, Inc.**

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THIS REPORT IS THE PROPERTY OF IVI AND EQUITY OFFICE PROPERTIES TRUST AND WAS  
PREPARED FOR A SPECIFIC USE, PURPOSE, AND RELIANCE AS DEFINED WITHIN THE  
AGREEMENT BETWEEN IVI AND EQUITY OFFICE PROPERTIES TRUST AND WITHIN THIS  
REPORT. THERE SHALL BE NO THIRD PARTY BENEFICIARIES, INTENDED OR IMPLIED, UNLESS  
SPECIFICALLY IDENTIFIED HEREIN.



PROPERTY CONDITION & ENVIRONMENTAL  
DUE-DILIGENCE

**IVI ASSESSMENT SERVICES, INC.**

55 West Red Oak Lane  
White Plains, New York 10604  
(914) 694-9600 (tel)  
(914) 694-1335 (fax)  
[www.ivi-intl.com](http://www.ivi-intl.com)

March 3, 2014

Mr. James Soutter  
Director of Engineering  
Equity Office Properties Trust  
2655 Campus Drive, Suite 100  
San Mateo, California 94403  
(650) 372-3553  
[james\\_soutter@equityoffice.com](mailto:james_soutter@equityoffice.com)

Re: Phase I Environmental Site Assessment  
Peninsula Office Park  
2600, 2655, 2755, 2800, 2929, 2955 & 2988 Campus Drive  
San Mateo, California 94403  
IVI Project No.: PC40208560

Dear Mr. Soutter:

IVI Assessment Services, Inc. ("IVI") is pleased to submit this copy of our Phase I Environmental Site Assessment on the above-referenced property. This report outlines the findings of IVI's site reconnaissance, historical land use research, review of governmental records, interviews, and our Pre-Survey Questionnaire.

I declare that, to the best of my professional knowledge and belief, I meet the definition of *environmental professional* as defined in § 312.10 of 40 CFR 312 and I have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the *subject property*. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Please contact the undersigned at **914.694.9600 (x-1933)** or by email at [michael.kennedy@ivi-intl.com](mailto:michael.kennedy@ivi-intl.com) should you have any questions.

Sincerely,

IVI Assessment Services, Inc.

Michael Kennedy  
Environmental Professional

NEW YORK · BOSTON · ATLANTA · DALLAS · LOS ANGELES  
CHICAGO · AUSTIN · DENVER · MIAMI · WASHINGTON, D.C.  
LONDON · PARIS · STOCKHOLM

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This report documents IVI's findings from our Phase I Environmental Site Assessment on the Peninsula Office Park, located at 2600, 2655, 2755, 2800, 2929, 2955, and 2988 Campus Drive, San Mateo, California (the "Subject"). The property, which is situated in a suburban area characterized by residential and commercial retail development and vacant land, consists of a 29.43-acre parcel improved with a 16 to 43-year-old (built in 1971-1998), office park. Prior to the construction of the existing improvements, the site was vacant land.

The purpose of this Phase I Environmental Site Assessment was to assess existing site conditions and render an opinion as to the identified or potential presence of recognized environmental conditions in connection with the property within the scope and limitations of ASTM International's Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-13 and the limitations identified herein. Exceptions to or deletions from the scope of work are described in Section 2.0.

This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the Subject; however, the following item of potential environmental concern was identified which warrants mention:

### **Asbestos-Containing Material (ACM)**

Based on the age of the site improvements, the potential presence of asbestos containing materials exists. IVI noted signs located near the roof access of the buildings identifying the presence of non-friable asbestos in roof penetration sealant. Signs were also noted in several of the basements regarding the presence of non-friable asbestos in the firebrick insulation. Furthermore, the friable acoustical ceiling tiles are suspected to contain asbestos; and the non-friable resilient floor finish assemblies, wallboard assemblies, roofing materials, caulking, and mastics may contain asbestos. The Subject has an existing Asbestos Operations and Maintenance (O&M) Program which is adequate and in-use. Since the suspect ACM was observed to be in good condition, no further action is recommended at this time other than maintaining same in good condition under the existing Asbestos O&M Program.

### 2.1 General

IVI was retained by Equity Office Properties Trust (“Client” or “User”) to prepare a Phase I Environmental Site Assessment, in conformance with ASTM International’s Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-13 on the Subject in accordance with our Agreement dated February 12, 2014.

### 2.2 Purpose and Scope

#### 2.2.1 Purpose

The purpose of this report is to identify Recognized Environmental Conditions in connection with the property, using the methodology recommended by ASTM International in order for a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser defenses to CERCLA liability and/or to help understand potential environmental conditions that could materially impact the operation of the business associated with the Subject. Specifically, this methodology is referred to as *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* Designation: E 1527-13.

The term Recognized Environmental Conditions is defined by ASTM Standard E 1527-13 as “...the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.”

#### 2.2.2 Scope

In general, the scope of this assessment consisted of reviewing readily available information and environmental data relating to the property; interviewing readily available persons knowledgeable about the site; reviewing readily available maps, aerial photographs and records maintained by federal, state, and local regulatory agencies; and conducting a site visit.

Of importance, the client is advised that federal, state, and local laws may impose environmental assessment obligations beyond the scope of this practice. Client is also notified that there are likely to be other legal obligations with regard to hazardous substances or petroleum products discovered on the Subject that are not addressed in this practice and that may pose risks of civil and/or criminal sanctions for non-compliance.

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The specific scope of this assignment included the following:

**2.2.2.1** Performing a site reconnaissance to characterize on-site conditions and assess the site's location with respect to surrounding property uses and natural surface features. In addition, IVI conducted a reconnaissance of the surrounding roads and readily accessible adjacent properties to identify obvious potential environmental conditions on neighboring properties. Photographs taken as part of the site reconnaissance are provided in Appendix A.

The site visit was conducted on February 20, 2014, by Ms. Carol Noland representing IVI. The site was represented by Ms. Michelle Hernandez, General Manager, and Mr. Gary Wilson, Chief Engineer. It was sunny and the temperature was approximately 75° F at the time of our site survey. IVI conducted the site reconnaissance in a systematic manner focusing initially on the exterior, which was surveyed in a grid pattern. IVI also surveyed a representative sampling of the interior spaces in a systematic manner.

**2.2.2.2** Interviewing persons familiar with the property to obtain information on present and previous on-site activities potentially resulting in the environmental degradation of the site or adjoining properties. A Pre-Survey Questionnaire to be filled out was provided to someone knowledgeable about the site. A blank copy of the Pre-Survey Questionnaire is provided in Appendix B.

The following table presents a summary of the individuals contacted or to whom requests for documentation were made as part of this assessment:

Name	Affiliation	Telephone No.
Michelle Hernandez	General Manager - Subject	(650) 372-3558
Gary Wilson	Chief Engineer - Subject	(650) 570-5468
Tanya Adamovitch	San Mateo County Environmental Health	(650) 372-6200
Debbie Ten Bruggencate	San Mateo Fire Department	(650) 522-7953
Customer Service Representative	Pacific Gas & Electric (PG&E)	(800) 743-5000

**2.2.2.3** If provided, reviewing of information such as previously prepared appraisals, building plans and specifications, and environmental reports.

- 2.2.2.4** Reviewing readily available historical documents, such as topographic maps, aerial photographs, city directories, Sanborn Fire Insurance Maps and atlases, to identify previous activities on and in the vicinity of the Subject. Copies of these documents are included in Appendix C.
- 2.2.2.5** Reviewing readily available environmental databases maintained by federal, state, and local agencies within the approximate minimum search distances as described within the Regulatory Review Section 6.0 of this report. A copy of the Computerized Environmental Report, provided by Environmental Data Resources, Inc. can be referenced in Appendix D.
- 2.2.2.6** Conducting a “Tier I” (non-intrusive) Vapor Encroachment Screening (VES) on the Subject in accordance with the methodology set forth in ASTM E 2600-10 “*Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*”. During the VES, the Area of Concern (AOC) was minimized using the methodology taught in the ASTM Screening for Vapor Encroachment onto Property Involved in Real Estate Transactions Training Course.
- 2.2.2.7** Conducting a visual survey of readily accessible common areas to identify the presence of the most obvious and common types of suspect asbestos containing materials (ACM). The basis for “suspect” determination is taken from the materials listed in Appendix G of the United States Environmental Protection Agency (USEPA) publication Managing Asbestos in Place (also known as the Green Book). All building materials listed within Appendix G of the Green Book are considered to be suspect ACMs at the Subject. This screening is not intended to be used for demolition, abatement, renovation, or repair work.

THIS LIMITED SURVEY IS NOT TO BE CONSTRUED AS A COMPREHENSIVE ASBESTOS SURVEY, WHICH OFTEN ENTAILS DESTRUCTIVE TESTING OR THE SURVEY OF AREAS BEHIND WALLS, ABOVE CEILINGS, IN TENANT SPACES AND IN OTHER TYPICALLY INACCESSIBLE AREAS. MOREOVER, IVI DOES NOT WARRANT THAT ALL ACMs AT THE SUBJECT HAVE BEEN IDENTIFIED.

- 2.2.2.8** Reviewing published radon occurrence maps to determine whether the site is located in an area with a propensity for elevated radon concentrations.

**2.2.2.9** An analysis of mold and/or mold issues was beyond the scope of this report.

**2.2.2.10** Assessing the age of the Subject to determine whether it is predisposed to contain lead-based paint. During our walkthrough survey, IVI noted the condition of the paint observed. Note, a compliance audit for lead paint was not conducted.  
NOTWITHSTANDING, THIS SCAN FOR LEAD-BASED PAINT SHOULD NOT BE CONSTRUED AS AN IN-DEPTH LEAD-BASED PAINT SURVEY.

**2.2.2.11** Testing, if any, was designed solely to meet the requirements of the client's scope of work, not to meet any local, State or Federal regulations and shall not be utilized as such.

### 2.3 Data Gaps

According to § 3.2.21 of ASTM Standard E 1527-13, a data gap is a lack of or inability to obtain information required by the ASTM Standard despite good faith efforts to gather same. Data gaps may result from incompleteness in any of the activities required by the ASTM Standard. The following data gaps occurred in connection with this report:

Data Gap	Explanation	Significance of Gap
Site History	Site history not conducted in 5-year intervals (See § 5)	Low - not likely to alter Report's conclusions due to IVI's search of standard historical sources of information such as aerial photographs, historic topographic maps, city directory abstracts, and interviews with knowledgeable individuals who were familiar with the property.
User Interview	AAI User Questionnaire not returned to IVI	Low - not likely to alter Report's conclusions
Former Owner or Operator Interview	Unable to interview former site owner or operator due to inability to locate	Low - not likely to alter Report's conclusions
Current Owner or Operator Interview	Pre-survey Questionnaire not returned to IVI	Low - not likely to alter Report's conclusions
Governmental Records	FOIAs not returned (See § 8.6)	Unknown - However, if receipt of FOIAs alters the Report's conclusion, the client will be notified

### 3.0 SALIENT ASSIGNMENT INFORMATION

Peninsula Office Park  
San Mateo, California

<b>Salient Assignment Information</b>	
<b>IVI Project No.:</b>	PC40208560
<b>Project Name:</b>	Peninsula Office Park (POP)
<b>Street Address:</b>	2600 Campus Drive (aka POP 6) 2655 Campus Drive (aka POP 4) 2755 Campus Drive (aka POP 5) 2800 Campus Drive (aka POP 3) 2929 Campus Drive (aka POP 8) 2955 Campus Drive (aka POP 9) 2988 Campus Drive (aka POP 1)
<b>City, State and Zip:</b>	San Mateo, California 94403
<b>Primary Use:</b>	Office
<b>Year Built and Age of Improvements:</b>	POP 1: Built in 1971; 43 Years Old POP 3: Built in 1973; 41 Years Old POP 4: Built in 1974; 40 Years Old POP 5: Built in 1976; 38 Years Old POP 6: Built in 1976; 38 Years Old POP 8: Built in 1982; 32 Years Old POP 9: Built in 1998; 16 Years Old
<b>Site Area:</b>	29.43 Acres (According to the county Assessor) POP 1: 2.79 Acres POP 3: 4.25 Acres POP 4: 3.38 Acres POP 5: 5.03 Acres POP 6: 3.62 Acres POP 8: 3.68 Acres POP 9: 6.68 Acres
<b>Building Size:</b>	POP 1: 41,005 SFG POP 3: 47,208 SFG POP 4: 52,016 SFG POP 5: 81,626 SFG POP 6: 62,050 SFG POP 8: 90,823 SFG POP 9: 134,728 SFG
<b>Number of Buildings:</b>	Seven

### 4.1 Property Location

The site is located at 2600, 2655, 2755, 2800, 2929, 2955, and 2988 Campus Drive in San Mateo, San Mateo County, California and is identified on local tax maps as Parcel Nos. 041-521-010; 041-521-020; 041-521-040; 041-522-010; 041-522-020; 041-522-070; and 041-522-080. Please refer to the Site Plan and maps provided within Appendix C.

The buildings are designated by the property management with individual building numbers as follows:

2988 Campus Drive – POP (Peninsula Office Park) 1  
2800 Campus Drive – POP 3  
2655 Campus Drive – POP 4  
2755 Campus Drive – POP 5  
2600 Campus Drive – POP 6  
2929 Campus Drive – POP 8  
2955 Campus Drive – POP 9

POP 2 and 7 are not included within the scope of this assessment.

For purposes of this report, the buildings will be referred to by their designated numbers as defined above in various sections.

### 4.2 Surrounding Land Use

The property is located in a suburban setting characterized by residential and commercial retail development and vacant land. The following is a tabulation of surrounding property usage:

Direction	Adjacent Properties	Surrounding Properties
Northeast	A US Postal Service data center (2700 Campus Drive) is located on the northeast side of the Subject. The Peninsula Golf & Country Club (701 Madera Drive) is located adjacent to the northeast.	Residential and commercial properties
Northwest	Construction of a residential neighborhood is underway adjacent to the northwest.	Vacant and residential properties.
South	An office building (2855 Campus Drive). Across Beresford Creek, downhill to the south, are the Oak View Apartments (3135 Campus Drive)	Laurelwood Shopping Center (contains Holiday Cleaners, 3166 Campus Drive)
East	Residential areas are located adjacent to the east.	Residential and school properties

Direction	Adjacent Properties	Surrounding Properties
West	State Route 92 is located to the west across Campus Drive. San Mateo College (1700 W. Hillsdale Boulevard) is located on a hilltop to the west.	Residential properties and vacant land

### 4.3 Physical Site Setting

#### 4.3.1 Size and Shape of Parcel

The property is irregular in shape and 29.43-acres in size.

#### 4.3.2 Topography

The Subject is depicted on the United States Geological Survey (USGS) *San Mateo, CA* 7.5 Minute Series topographic map. The topography across the Subject varies, but in general slopes moderately from the west to east at an average gradient of 7.5 percent. The topographic elevation on the west side of the Subject is approximately 380' above mean sea level (msl), while the elevation on the east side of the Subject is approximately 260' above msl.

#### 4.3.3 Surface Waters and Wetlands

##### Surface Waters

There are no surface waters on the Subject. Beresford Creek is located adjacent to the south of the Site.

##### Wetlands

IVI reviewed a wetlands map of the subject area prepared using the US Department of the Interior, Fish and Wildlife Service's Internet Wetland Interactive Mapper. The source material used to produce the National Wetlands Inventory digital data for these maps was prepared primarily by stereoscopic analysis of high altitude aerial photographs. Based on this review, IVI did not identify any federally regulated wetlands on the subject property. Additionally, IVI did not observe vegetation characteristic of wetlands on the subject site.

### 4.3.4 Soils, Geology and Groundwater

#### Soils

According to the *Soil Survey of San Mateo County, California*, dated May 1991, issued by the United States Department of Agriculture, Soil Conservation Service, the soils at the site are classified as Urban Land-Orthents, cut and fill complex with 5 to 75 percent slopes. Urban Land complex are those soils in which the soil's original structure and content have been so altered by human activities it has lost its original characteristics and is thus unidentifiable.

#### Geology

There are no predominant geological surface features such as rock outcroppings on the Subject. The Subject is located within the Coast Ranges Geomorphic Province of California, which is characterized by northwest-trending structural features, including folds, faults and geologic units. The Subject has been mapped as being underlain by alluvial sediments, described as weakly consolidated, slightly weathered, poorly sorted clay, silt, sand and gravel.

#### Groundwater

Under natural, undisturbed conditions, shallow groundwater flow generally follows the topography of the land surface and on this basis, the topography suggests that groundwater flow across the site is in a southerly direction. However, localized conditions can alter flow direction and thus the presumed flow may not coincide with the actual in the subject area. Shallow groundwater in the vicinity of the site is anticipated to be encountered at a depth of approximately 15-30' below ground surface.

## 4.4 Site Improvements

### 4.4.1 Utilities

The Subject is served with the following utilities:

Water:	California Water Service
Sanitary Sewer:	City of San Mateo Public Works
Storm Sewer:	City of San Mateo Public Works
Electric:	Pacific Gas & Electric (PG&E)
Natural Gas:	PG&E

According to 2012 Water Quality Report published by California Water Service Company, the water supplied to the Subject meets federal and state water quality standards.

Stormwater runoff collected by catch basins is discharged into the municipal stormwater management system.

### 4.4.2 Building Description

Construction consists of conventional concrete spread footings at perimeter and intermittent columns, and a concrete SOG. The superstructure for all the buildings with the exception of POP 9 is comprised of a concrete-framing system supporting elevated concrete slabs. POP 9 has a substructure that is comprised of structural steel framing supporting elevated composite slabs. The facade system of POP 4 and POP 5 consist predominantly of brick veneer with ribbon windows. POP 1, 3, 6, and 8 façade systems consist predominately of precast concrete panels with a ribbon window system. POP 9 has a façade system consisting of an aluminum-framed slate-tile panels and glass curtain wall system with reflective glazing. Roofing consists of a BUR system with ballast or a mineral cap in a flat design.

Interior finishes include floor coverings of carpet, resilient floor tile, sheet vinyl, and painted concrete; walls of painted gypsumboard and ceilings typically consist of painted drywall and a suspended system with inlaid acoustical ceiling tiles.

Central heating and air conditioning are generally provided by a DX-system consisting of a cooling tower working with a boiler, supply and return fans, and compressors. This system is present in all of the buildings except for POP 9 which has a chilled water system consisting of a chiller, boiler, cooling tower, and supply and return fans. Central domestic water is provided by gas-fired tank type water heaters. Electricity and gas are centrally metered. Fire protection is provided by a stand pipe system and monitored by a supervised fire alarm. The Subject is complete with hydraulic elevators.

### 4.5 Current Property Use

The Subject is developed with an office park. All tenants use the Subject for general office purposes only. The following table summarizes the Subject's tenants

Tenant	Location
Equity Office	2655 Campus Drive (POP 4)
Critical Path	2655 Campus Drive
Clarizen	2655 Campus Drive
Shay Glenn LLP	2755 Campus Drive (POP 5)
Afferent Pharmaceuticals	2755 Campus Drive
Infovity	2755 Campus Drive
First American Title NCS	2755 Campus Drive
Argyle Data	2755 Campus Drive
2d3 Sensing	2755 Campus Drive
Kindred Partners	2755 Campus Drive
First Cal	2755 Campus Drive
KKR Accounting Services LLC	2755 Campus Drive
Quantance	2800 Campus Drive (POP 3)
Jelastic Inc.	2800 Campus Drive
NLyte Software	2800 Campus Drive
Hexit Cyber Solutions, Inc.	2800 Campus Drive
American Institutes for Research	2800 Campus Drive
Account Temps	2929 Campus Drive (POP 8)
Cloud Share	2929 Campus Drive
ENFOS Inc.	2929 Campus Drive
Fisher Lynch Capital	2929 Campus Drive
Fourth Dimension Software	2929 Campus Drive
Mainstay Saline	2929 Campus Drive
MEDIAmobz Video Commutations	2929 Campus Drive
Office Team	2929 Campus Drive
Robert Half International, Inc.	2929 Campus Drive
Sensiba San Filipe LLP	2929 Campus Drive
Shank/Belfour Beatty	2929 Campus Drive
Towers Watson	2929 Campus Drive
Campus Café	2955 Campus Drive (POP 9)
NetSuite	2955 Campus Drive
Wize Commerce	2955 Campus Drive
Bosch Solar Energy Corporation	2988 Campus Drive (POP1)
AtHoc	2988 Campus Drive
Spencer Stuart	2988 Campus Drive

The building at 2600 Campus Drive (POP 6) is currently vacant.

Based on the operations currently conducted at the Subject, significant quantities of hazardous waste are not generated. The current on-site activities are not suspected to have degraded the environmental quality of the subject site.

### 4.6 Environmental Permits

The Subject buildings have been issued air emissions permits by the Bay Area Air Quality Management District (BAAQMD) for the operations of natural gas-powered boilers. In addition, a BAAQMD permit was issued for the building at 2955 Campus Drive for the operation of a diesel-powered generator.

### 4.7 Plans and Specifications

Neither building drawings nor specifications were provided for our review.

### 5.1 Historical Summary

Prior to the construction of the existing improvements, the site was vacant land.

### 5.2 Topographic Maps

IVI reviewed historic USGS *San Mateo, CA* 7.5 Minute Series topographic maps of the Subject area provided by EDR. The following maps were provided for our review:

Year Revised	Subject Property	Surrounding Properties
1949	The Subject is depicted as vacant land.	The Peninsula Country Club is located to the northeast. A residential area is located to the east. The remainder of the surrounding area appears primarily undeveloped.
1956	Similar to the previous topographic map reviewed, although a road appears to cross through the southeastern end of the Subject.	Increased residential development is located to the east. Two water towers are depicted approximately 0.10 mile to the southeast. No other significant changes were noted.
1968	Similar to the previous topographic map reviewed.	State Route 92 is present to the west, followed by the College of San Mateo. Commercial buildings are located approximately 0.10 mile to the south, followed by residential development. No other significant changes were noted.
1973	Campus Drive is in place. The POP1 building is present on the northwest end of the Subject. Another building is depicted in the current location of POP 8 and POP 9 near the southwest end of the Subject. None of the other current buildings are present.	The building at 2855 Campus Drive, which is not a part of the Subject, is in place. Several additional buildings are present to the west across State Route 92. No other significant changes were noted.
1980	POP 1 through POP 6 are present on the Subject. No other significant changes were noted.	The building at 2700 Campus Drive is depicted on the northeast end of the office park. No other significant changes were noted.

The topographic maps identify the existing improvements in red tint, which indicates they were constructed between 1973 and 1980. No industrial facilities, landfills or wetlands were identified on, or immediately adjacent to the Subject.

### 5.3 Historical Maps

#### Sanborn Fire Insurance Maps (Sanborn Maps)

IVI had a search of Sanborn Maps conducted. This search did not identify Sanborn Map coverage for the Subject area. The lack of Sanborn mapping suggests that the Subject area was not a historically urbanized area.

### 5.4 Aerial Photographs

Aerial photographs frequently provide visual documentation of site conditions at the time of the photographs. Activities such as dumping or industrial use of a site can often be discerned through the examination of aerial photographs. IVI reviewed historic aerial photographs provided by EDR. The following is a synopsis of the aerial photographs reviewed:

Year	Subject Property	Adjacent and Surrounding Properties
1943	The Subject is depicted as vacant land.	The Peninsula Country Club is located to the northeast. Some agricultural land and a residential area are located to the east. The remainder of the surrounding area appears primarily undeveloped.
1946	Similar to the previous aerial photograph reviewed.	Similar to the previous aerial photograph reviewed.
1956	Similar to the previous aerial photograph reviewed.	Increased residential development is located to the east. Two water towers are depicted approximately 0.10 mile to the southeast. Several buildings are located to the northwest. No other significant changes were noted.
1968	Similar to the previous aerial photograph reviewed.	State Route 92 is present to the west, followed by the College of San Mateo. Commercial buildings are located approximately 0.10 mile to the south, followed by residential development. Increased residential development is also located to the east. No other significant changes were noted.
1974	POP 1, POP 3, and POP 4 are depicted on the Subject. Another building is depicted in the current location of POP 8 and POP 9 near the southwest end of the Subject.	The building at 2855 Campus Drive, which is not a part of the Subject, is in place. An apartment building is located to the south across Beresford Creek. Several additional buildings are present to the west across State Route 92. No other significant changes were noted.

## 5.0 HISTORICAL USE

Peninsula Office Park  
San Mateo, California

Year	Subject Property	Adjacent and Surrounding Properties
1983	All buildings except POP 9 are present on the Subject.	The building at 2700 Campus Drive is depicted on the northeast end of the office park. Increased commercial development is located to the south. No other significant changes were noted.
1993	Similar to the previous aerial photograph reviewed.	Similar to the previous aerial photograph reviewed.
1998	POP 9 and the associated parking structure are present on the western end of the Subject. No other significant changes were noted.	Similar to the previous aerial photograph reviewed.
2005	Similar to the previous aerial photograph reviewed.	Similar to the previous aerial photograph reviewed.
2009	Similar to the previous aerial photograph reviewed.	Similar to the previous aerial photograph reviewed.
2012	Similar to the previous aerial photograph reviewed.	Similar to the previous aerial photograph reviewed.

### 5.5 Chain-of-Ownership

A copy of the Subject's Chain-of-Title has not been provided to IVI for review.

### 5.6 Previous Reports

Although requested, no previously prepared environmental reports such as Phase I or II Environmental Site Assessments, lead-based paint surveys, lead-in-water surveys, asbestos surveys or geotechnical reports were provided for our review.

### 5.7 City Directories

A Historical City Directory Abstract obtained from EDR was reviewed. This Abstract provides site occupant listings by address. Of note, the building at 2955 Campus Drive was previously occupied by a restaurant at 2951 Campus Drive. This review yielded the following information:

Year	Subject Property	Surrounding Properties
1977	2655 Campus – office building 2800 Campus – Office building 2951 Campus – Borel's Restaurant 2988 Campus – Office building	2855 Campus – Office building 3135 Campus – Oak View Apartments

## 5.0 HISTORICAL USE

Peninsula Office Park  
San Mateo, California

Year	Subject Property	Surrounding Properties
1980	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2951 Campus – Borel's Restaurant 2988 Campus – Office building	2700 Campus – Office building 2855 Campus – Office building 3135 Campus – Oak View Apartments
1985	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2929 Campus – Office building 2951 Campus – Borel's Restaurant 2988 Campus – Office building	2700 Campus – Office building 2855 Campus – Office building 3135 Campus – Oak View Apartments
1990	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2929 Campus – Office building 2951 Campus – Borel's Restaurant 2988 Campus – Office building	2700 Campus – US Postal Service Data Center 2855 Campus – Office building 3135 Campus – Oak View Apartments 3166 Campus – Holiday Cleaners
1995	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2929 Campus – Office building 2951 Campus – Peninsula Office Park 2988 Campus – Office building	2700 Campus – US Postal Service Data Center 2855 Campus – Office building 3135 Campus – Oak View Apartments 3166 Campus – Holiday Cleaners
1999	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2929 Campus – Office building 2988 Campus – Office building	2700 Campus – US Postal Service Data Center 2855 Campus – Office building 3135 Campus – Oak View Apartments 3166 Campus – Holiday Cleaners
2003	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2929 Campus – Office building 2955 Campus – Office building 2988 Campus – Office building	2700 Campus – US Postal Service Data Center 2855 Campus – Office building 3135 Campus – Oak View Apartments 3166 Campus – Holiday Cleaners

## 5.0 HISTORICAL USE

Peninsula Office Park  
San Mateo, California

Year	Subject Property	Surrounding Properties
2008	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2929 Campus – Office building 2955 Campus – Office building 2988 Campus – Office building	2700 Campus – US Postal Service Data Center 2855 Campus – Office building 3135 Campus – Oak View Apartments 3166 Campus – Kim's Holiday Cleaners
2013	2600 Campus – Office building 2655 Campus – Office building 2755 Campus – Office building 2800 Campus – Office building 2929 Campus – Office building 2955 Campus – Office building 2988 Campus – Office building	2700 Campus – US Postal Service Data Center 2855 Campus – Office building 3135 Campus – Oak View Apartments 3166 Campus – Kim's Holiday Cleaners

Of note, Holiday Cleaners at 3166 Campus Drive is located over 584 feet to the south/southwest, downgradient of the Subject, and is not considered a significant concern.

No other concerns were identified.

### 5.8 Interviews

According to Michelle Hernandez, the General Manager, the site contact, who has been involved with the property for the past seven years, the Subject buildings were constructed at various times between 1971 and 1998.

According to Gary Wilson, the Chief Engineer, who has been involved with the property for the past 35 years, the Subject buildings were constructed at various times between 1971 and 1998. Mr. Wilson stated that the land currently occupied by POP 9 originally contained Borel's Restaurant. All of the other buildings were constructed on previously unimproved land.

### 5.9 Municipal Records

#### Tax Assessor Records

According to the tax assessor records reviewed, the Subject consists of seven parcels totaling 29.43 acres.

### 5.10 Internet Search

IVI conducted a cursory internet search for the Subject's name and address using the Google search engine on February 24, 2014.

No environmentally related information was identified on the first page of the Google search results.

A copy of regulatory database information contained within a Computerized Environmental Report (CER) provided by Environmental Data Resources, Inc. (EDR) appears in Appendix D. The CER is a listing of sites identified on select federal and state standard source environmental databases within the approximate minimum search distance specified by ASTM Standard Practice for Environmental Site Assessments E 1527-13. IVI reviewed each environmental database to determine if certain sites identified in the CER are suspected to represent a material negative environmental impact to the Subject. The following table lists the number of sites by regulatory database within the prescribed minimum search distance appearing in the CER.

Databases Reviewed	Approximate Minimum Search Distance (AMSD)	Number of Sites Within AMSD
Federal National Priorities List (NPL) Site List	One-Mile	0
Federal Delisted NPL Site List	One-Half Mile	0
Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)	One-Half Mile	0
Federal CERCLIS No Further Remedial Action Planned (NFRAP) Sites	One-Half Mile	0
Federal Resource Conservation and Recovery Information System (RCRIS) Treatment, Storage, and Disposal (TSD) List	One-Half Mile	0
Federal RCRIS Generators List	On-Site and Adjoining Properties	1
Federal Corrective Action Tracking System (CORRACTS)	One-Mile	0
Federal Emergency Response Notification System (ERNS) List	On-Site	0
Federal Institutional/Engineering Control Registries	On-Site	0
California and Tribal Lists of NPL Equivalent Hazardous Waste Sites Identified for Investigation and/or Remediation	One-Mile	0
California and Tribal Lists of CERCLIS Equivalent Hazardous Waste Sites Identified for Investigation and/or Remediation	One-Half Mile	0
California and Tribal Landfills or Solid Waste Facilities List	One-Half Mile	0
California and Tribal Registered Underground Storage Tank (RUST) Facility List	On-Site and Adjoining Properties	0
California and Tribal Leaking UST/Spill List	One-Half Mile	11
California and Tribal Institutional/Engineering Control Registries	On-Site	0

Databases Reviewed	Approximate Minimum Search Distance (AMSD)	Number of Sites Within AMSD
California and Tribal Voluntary Cleanup Sites	One-Half Mile	0
California and Tribal Brownfields Sites	One-Half Mile	0
California HAZNET	On-Site	14
California EMI	On-Site	2
San Mateo County Business Inventory	On-Site	2

The CER identified 20 "Orphan Sites". "Orphan Sites" are those sites that could not be mapped or "geocoded" due to inadequate address information. Please refer to the CER for a list of these "Orphan Sites". IVI attempted to locate these sites via a review of street maps, vehicular reconnaissance and/or interviews with people familiar with the area. "Orphan Sites" that were identified in this manner were analyzed in their respective regulatory database below.

A description of the databases reviewed by IVI and an analysis of sites identified within the prescribed search area are presented below.

### 6.1 Federal Databases

#### NPL

The NPL database is a listing of the most serious uncontrolled or abandoned hazardous waste sites identified for possible long-term remedial action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA or "Superfund"). A site must be on the NPL to receive money from the Trust Fund for Remedial Action.

*Analysis/Comment:* The CER did not identify NPL sites within the AMSD.

#### Delisted NPL Site List

The EPA may delete a final NPL site if it determines that no further response is required to protect human health or the environment, under Section 300.425(e) of the National Contingency Plan (55 FR 8845, March 8, 1990). Sites that have been deleted from the NPL remain eligible for further Superfund-financed remedial action in the unlikely event that conditions in the future warrant such action. Partial deletions can also be conducted at NPL sites.

*Analysis/Comment:* The CER did not identify Delisted NPL sites within the AMSD.

### CERCLIS

CERCLIS is the USEPA's system for tracking potential hazardous-waste sites within the Superfund program. A site's presence on CERCLIS does not imply a level of federal activity or progress at a site, nor does it indicate that hazardous conditions necessarily exist at the location. Within one year of being entered into CERCLIS, the USEPA performs a preliminary assessment of a site. Based upon the results of the preliminary assessment, the USEPA may conduct additional investigation, which could lead to a site being listed on the NPL.

*Analysis/Comment:* The CER did not identify CERCLA sites within the AMSD.

#### CERCLIS No Further Remedial Action Planned (NFRAP) Sites

As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from the CERCLIS list. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to warrant Federal Superfund Action or NPL consideration.

*Analysis/Comment:* The CER did not identify CERCLA NFRAP sites within the AMSD.

### RCRIS TSD

The RCRIS TSD contains information pertaining to those facilities that treat, store, or dispose of hazardous waste. While these facilities represent some form of hazardous waste activity, they are most significant if determined to be out of compliance or to have violations.

*Analysis/Comment:* The CER did not identify RCRIS TSD facilities within the AMSD.

### RCRIS Generators

IVI reviewed the list of sites, which have filed notification with the USEPA in accordance with RCRA requirements. These sites include generators of hazardous waste regulated under RCRA. Under RCRA, hazardous waste generators are classified by the quantity of hazardous waste generated in a calendar month into the following categories: Large Quantity Generator (LQG), greater than 1,000 kilograms (kg); Small Quantity Generator (SQG), 100 to 1,000 kg; and Conditionally-Exempt Small Quantity Generator (CESQG), less than 100 kg. RCRA Generators, while they represent some form of hazardous waste activity, are most significant if they are determined to have Class I Violations or to be non-compliant.

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*Analysis/Comment:* The CER identified the following RCRA Generator located within the AMSD:

Property Name/ Address	Distance (Mile)	Direction	Presumed Hydrogeologic Relationship	Regulatory Status
Chemcrete International/ 2755 Campus Drive	On-Site	NA	NA	Compliant/No Violations

This listing is for a former occupant of the Subject, listed as a small quantity generator. The EPA ID number for the site, CAD982355927, has been inactive since 1998. Inclusion of a site on the RCRA Generator list does not necessarily constitute environmental contamination, but instead merely indicates that a hazardous waste stream was or is generated. Moreover, the waste stream may not be generated at the site listed, as these addresses at times merely reflect the generator's corporate office.

Nevertheless, this listing was not cross-referenced on any regulatory databases that report releases or contamination conditions, such as the SHWS, LUST or SLIC databases. Based on the above information, this listing is not suspected to be of a significant environmental concern to the Subject.

### Corrective Action Tracking System (CORRACTS)

CORRACTS is a list of facilities that are found to have had hazardous waste releases and require RCRA corrective action activity, which can range from site investigations to remediation.

*Analysis/Comment:* The CER did not identify CORRACTS sites within the AMSD.

### ERNS

The ERNS is a database of notifications of oil discharges and hazardous substance releases made to the Federal government. These notifications are used by "On-Scene Coordinators" to determine an emergency response and release prevention. When a call is made to the National Response Center or one of the 10 USEPA Regions, a report is created containing all of the release information that the caller provided. This report is transferred to an appropriate agency to evaluate the need for a response and the records are electronically transferred to the ERNS database. As such, if a reported release of oil or a hazardous substance is deemed to require a response, it should also be listed in the appropriate federal or state environmental database such as CERCLIS, state equivalent CERCLIS, or state leaking underground storage tank or spills lists.

***Analysis/Comment:*** The CER did not identify the Subject on the ERNS database.

**Federal Institutional Control/Engineering Control Registries**

These Federal registries contain listings of those sites which have either engineering and/or institutional controls in place. Engineering controls include various physical control devices such as fences, caps, building slabs, paved areas, liners and treatment methods to eliminate pathways for regulated substances to enter the environment or affect human health. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions (Activity and Use Limitations) are generally required as part of institutional controls.

***Analysis/Comment:*** The CER did not identify the Subject on the Federal Institutional or Engineering Control registries.

### FINDS

FINDS contains both facility information and “pointers” to other environment database sources that contain additional detail. These other databases include: RCRIS, PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]), CERCLIS, DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), FRDS (Federal Reporting Data System), SIA (Surface Impoundments), CICIS (TSCA Chemicals in Commerce Information System), PADS, RCRA-J (medical waste transporters/disposers), TRIS and TSCA.

***Analysis/Comment:*** The CER identified the Subject on the FINDS database, under the name of Chemcrete International at 2755 Campus Drive. The listing appears to be related to the identification of this business on the RCRA SQG list, as discussed above.

The Subject is also listed on the FINDS database under the name of Equity Office Management at 2955 Campus Drive. This listing is related to the National Emissions Inventory database, Criteria and Hazardous Air Pollutant Inventory list, likely related to the operation of a permitted generator at the Subject. This listing has an associated EMI listing as well (see below).

Nevertheless, these listings were not cross-referenced on any regulatory databases that report releases or contamination conditions, such as the SHWS, LUST or SLIC databases. Based on the above information, these listings are not suspected to be of a significant environmental concern to the Subject.

### 6.2 California Environmental Protection Agency (Cal/EPA) Databases

#### **Response and Tribal NPL Equivalent Hazardous Waste Sites (HWS)**

The Response database is a list of confirmed release sites where DTSC is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk.

*Analysis/Comment:* The CER did not identify sites within the AMSD.

#### **Envirostor, HIST Cal-Sites, and Tribal CERCLIS Equivalent Hazardous Waste Sites (HWS)**

The Department of Toxic Substances Control's (DTSC's) Site Mitigation and Brownfields Reuse Program's (SMBRP's) EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (National Priorities List (NPL)); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

The HIST Cal-Sites database is a list of facilities subject to investigation concerning likely or threatened releases of hazardous substances. These sites are either being actively remediated, or are currently under evaluation for further action, if necessary. This database has been replaced by Envirostor and is no longer being updated.

Tribal CERCLIS Equivalent HWS list is an inventory of toxic sites listed by Tribal Environmental and Health Authorities. These sites are either under remediation, or are currently under evaluation for further action, if necessary.

*Analysis/Comment:* The CER did not identify California and/or Tribal CERCLIS Equivalent Hazardous Waste sites within the AMSD of 0.5 mile.

#### **California and/or Tribal Solid Waste Facilities (SWF) List**

The SWF list is an inventory of active, closed and inactive landfills and other sites that manage solid wastes.

*Analysis/Comment:* The CER did not identify SWF sites within the AMSD.

### **California and/or Tribal Registered Underground Storage Tanks (UST), HIST USTs and SWEEPS UST Facility Lists**

The UST facility list is an inventory of registered liquid bulk storage tanks. The HIST UST database, aka the Hazardous Substance Storage Container Database, is a historical listing of UST sites. The SWEEPS UST database, aka the Statewide Environmental Evaluation and Planning System, is a list of USTs that was updated and maintained by a company contacted by the State Regional Water Quality Control Board in the early 1980's. This listing is no longer updated or maintained but has historical significance.

Inclusion of a site on these lists does not necessarily constitute environmental contamination, but instead merely indicates the presence of registered bulk storage tanks.

*Analysis/Comment:* The CER did not identify sites within the AMSD.

### **California and Tribal Leaking Underground Storage Tanks (LUST) List and Spills, Leaks, Investigations and Cleanups (SLIC) Records**

The LUST list is an inventory of reported spills and leaks, both active and inactive maintained by the various California Regional Water Quality Control Boards. It includes stationary and non-stationary source spills reported to state and federal agencies, including remediated and contaminated leaking UST sites. SLIC records, which are maintained by the various Regional Water Quality Control Boards, document unauthorized discharges from spills and leaks from sources other than UST and other regulated sites.

*Analysis/Comment:* The CER identified 11 LUST/SLIC sites within the AMSD, 10 of which have been granted a Case Closed status. A Case Closed status is granted to those sites that do not exhibit levels of contamination requiring clean-up, have been remediated to the satisfaction of the lead regulatory agency, or are not suspected to represent a significant threat to human health or the environment. As such, absent additional information to the contrary, it is unlikely that contamination originating at sites with a Case Closed status have had a significant negative environmental impact on the Subject.

The remaining open LUST site is discussed below:

Property Name/ Address	Distance (Mile)	Direction	Presumed Hydrogeologic Relationship	Regulatory Status
College Plaza Shell/1400 W. Hillsdale Blvd.	0.15 (corrected)	South	Downgradient	Eligible for closure

This site is an active Shell-branded gasoline station. In 1986, in order to assess the impact of a reported product loss, five borings were installed at the site, under the direction of the San Mateo County Groundwater Protection Program (GPP). One of the borings was converted into a tank backfill well within the UST complex, and was found to contain approximately 10 inches of separate-phase hydrocarbons (SPH). Three groundwater monitoring wells were installed at the site in 1988 to further assess the soil and groundwater quality beneath the site. A second tank backfill well was installed in 1989 to assist in the removal of the SPH within the UST complex. Between 1986 and 1991, approximately 21 gallons of SPH were hand-bailed from the two backfill wells.

In 1998, two 5,000-gallon and two 8,000-gallon gasoline USTs, along with the associated piping and product dispensers, were removed from the site. One of the 5,000-gallon USTs was found to contain a 2-inch hole in the bottom. No holes were found in the other USTs. Soil from the UST pit was overexcavated to a depth of approximately 15 feet below grade for the installation of three 10,000-gallon, double-walled fiberglass USTs. Approximately 1,176 tons of soil were excavated and disposed of at an off-site landfill. The two tank backfill wells were destroyed and not replaced. Soil samples were collected from beneath the former USTs, piping and dispenser islands, although the results of the soil sampling were not readily available for review. Groundwater monitoring took place between 1998 and 2001, and gasoline constituents were found to be near or below reporting limits. In 2001, the County GPP issued a site closure letter to the site.

In 2008, three soil borings were installed to assess the soil and groundwater conditions beneath the site. Gasoline constituents were detected in the soil and grab groundwater samples collected from one of the borings. Low levels of MTBE were detected in the grab groundwater from another boring. Based on the results of this investigation, the County GPP reopened the LUST case at the site. Three groundwater monitoring wells were subsequently installed in 2010, and elevated gasoline constituent concentrations were reported in the samples collected.

In early 2012, two additional on-site groundwater monitoring wells were installed and two off-site soil borings were drilled. No elevated gasoline constituents were detected in the soil samples collected from the offsite borings. However, elevated levels of TPHg, benzene and MTBE were detected in the grab groundwater samples from the off-site borings, as well as from the groundwater samples collected from the on-site wells. In October 2012, one soil boring was drilled to the south-southeast of the site for additional off-site delineation. No elevated gasoline constituents were detected in the soil samples collected from the offsite boring. A minor level of MTBE was detected in a grab groundwater sample from the boring, but no other gasoline constituents were detected.

The site's consultant, Conestoga-Rovers & Associates, have submitted a request to the County GPP to close the site under the Low-Threat Underground Storage Tank Closure Policy. The site is undergoing quarterly monitoring while awaiting a response to the request for site closure.

Due to the site's downgradient location and its separation from the Subject by Beresford Creek, which likely would act as a hydraulic barrier prohibiting the migration of contaminated groundwater from impacting the Subject, it is unlikely that contamination originating at this site has migrated on to the Subject.

### **California Deed Restriction Listing and Tribal Institutional Control/Engineering Control Registries**

The DTSC SMBRP list includes sites remediated under the program's oversight that have active deed restrictions. The DTSC Hazardous Waste Management Program Facility Sites (HWMP) list includes current and former hazardous waste facilities with deed/Land Use Restrictions that have been recorded with the County. The type of land use restrictions includes deed notices, deed restrictions, or a land use restriction that binds current and future owners.

The Tribal Institutional Control/Engineering Control Registries contain listings of those sites which have either engineering and/or institutional controls in place. Engineering controls include various physical control devices such as fences, caps, building slabs, paved areas, liners and treatment methods to eliminate pathways for regulated substances to enter the environment or effect human health. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions (Activity and Use Limitations) are generally required as part of institutional controls.

***Analysis/Comment:*** The CER did not identify the Subject on the SMBRP, HWMP or Tribal Institutional or Engineering Control registries.

### **California and Tribal Voluntary Cleanup Program (VCP) Sites**

The California VCP properties list includes "low" threat level properties with either confirmed or unconfirmed releases and the project proponents have requested that the DTSC oversee the investigation and cleanup.

***Analysis/Comment:*** The CER did not identify VCP sites within the AMSD

### California and Tribal Brownfield Sites

A Brownfield site was defined in the 2002 Small Business Liability Relief and Brownfields Revitalization Act (Brownfields Law) as "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant". In connection with the passage of the Brownfields Law, the Environmental Protection Agency grants awards to states and tribes for activities under Section 128 (a).

*Analysis/Comment:* The CER did not identify Brownfield sites within the AMSD.

### California HAZNET

The data is extracted from the copies of hazardous waste manifests received each year by the DTSC. The annual volume of manifests is typically 700,000 - 1,000,000 annually, representing approximately 350,000 - 500,000 shipments. Data are from the manifests submitted without correction, and therefore many contain some invalid values for data elements such as generator ID, TSD ID, waste category, and disposal method.

*Analysis/Comment:* The CER identified 14 separate HAZNET listings for the Subject addresses. The listings were for the removal of asbestos-containing waste, organic solids, unspecified oil-containing wastes, and PCBs. Since no manufacturing activities occur at the Subject, these wastes are likely part of the general maintenance operations for the on-site equipment, and for asbestos waste generated during tenant improvement activities. Of note, each of the EPA numbers identified is noted as inactive on the State of California DTSC Hazardous Waste Tracking System. However, the DTSC system notes one active EPA ID, CAC002760637, for the address of 2600 Campus Drive, which according to Gary Wilson, the Chief Engineer, is for the removal of asbestos-containing floor mastic from that building.

None of the Subject addresses were identified on any regulatory databases that report releases or contamination conditions, such as the SHWS, LUST or SLIC databases. Based on the above information, these listings are not suspected to be of a significant environmental concern to the Subject.

### California Emissions Inventory Data (EMI)

Database of toxics and criteria pollutant emissions data collected by the California Air Resources Board.

*Analysis/Comment:* The Subject address of 2955 Campus Drive was twice identified on the EMI database, under the name of Equity Office Properties and EOP – Peninsula Office Park. It is likely that these listings are related to

emissions from the diesel-powered generator at the Subject. These listings are not suspected to be of a significant environmental concern to the Subject since this database provides information on facilities with air emissions permits and not on spills or cleanups. Therefore, inclusion on this database does not represent an adverse impact on the subject property.

### **San Mateo County Business Inventory**

Any business that has hazardous materials onsite - hazardous materials storage sites, underground storage tanks, waste generators. This listing also deals with properties that have filed a business plan with the County of Sacramento or have a food establishment. The ML is maintained by the San Mateo County Environmental Health Services Division.

***Analysis/Comment:*** The CER identified Equity Office at 2955 Campus Drive on the San Mateo County Business inventory list, Facility ID number FA0032772 for the storage of diesel fuel for the on-site generator. Additionally, Verizon Wireless at 2929 Campus Drive was identified for the storage of hazardous materials (batteries) associated with a cell site located on the roof of the building.

Nevertheless, none of these listings was cross-referenced on any regulatory databases that report releases or contamination conditions, such as the SHWS, LUST or SLIC databases. Based on the above information, these listings are not suspected to be of a significant environmental concern to the Subject.

### **6.3 EDR Proprietary Databases**

#### **EDR Manufactured Gas Plants**

This database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to the 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of wastes. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

***Analysis/Comment:*** The CER did not identify the Subject or any adjacent properties on the manufactured gas plant database.

### **EDR Historic Auto Stations**

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc.

***Analysis/Comment:*** The CER identified the Subject on the historical auto stations database. Specifically, Autowatch was listed at 2800 Campus Drive in 2006. However, Autowatch is a software website company and not an actual auto repair business. Thus, this listing is not a concern to the Subject.

### **EDR Historic Cleaners**

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc.

***Analysis/Comment:*** The CER did not identify the Subject or any adjacent properties on the historical cleaners database.

### 7.1 Chemical Storage and Usage

With the exception of chemicals customarily used for routine building maintenance and cleaning, IVI did not observe any hazardous chemicals stored on-site. For the most part, the maintenance chemicals are stored in a flammable storage cabinet located in the engineering office located in POP 9. Of note, floor drains were not observed in the vicinity of the chemical storage areas. MSDSs are maintained on-site. In addition, housekeeping was generally considered satisfactory. The chemicals, which are stored in their original containers, do not appear to represent an impact to the environmental quality of the site provided that they are used as intended, properly handled, and the regulations pertaining to their usage are followed.

Of note, each building has a cooling tower which uses a Chem-Aqua water treatment system.

### 7.2 Bulk Storage Tanks

#### Underground Storage Tanks (USTs)

No USTs were identified on the subject property and no common indicators of USTs such as vent pipes, fill ports, manways, pavement cuts, fuel gauges or dispensers were observed. In addition, according to Gary Wilson, there are no USTs on-site. Furthermore, the Subject was not identified on the California list of registered UST facilities.

No underground storage tanks were reportedly removed, closed-in-place or abandoned at the site and no common indicators of closed tanks were observed.

#### Aboveground Storage Tanks (ASTs)

ASTs per the following schedule were observed:

Tank No.	Location	Capacity (Gallons)	Product	Visible Condition	Secondary Containment
1	Within emergency generator	109	Diesel	Good	Yes

The emergency generator contains an integral base tank. The tank is of double-walled construction. No evidence of leakage or staining was observed on or around the tank. As such, this tank is not an environmental concern to the Subject.

### 7.3 Site Waste and Wastewater

#### Solid Waste

Non-hazardous solid waste is disposed of in dumpsters and is removed from the Subject on a regular basis by Recology. Potential sources of contamination, such as waste oil or automobile batteries, were not observed in the vicinity of the dumpsters.

#### Sanitary Sewage

Sanitary sewage disposal is provided by the City of San Mateo. IVI did not observe any sources of wastewater or liquid discharge into the sewer other than sanitary sewage.

#### Hazardous Waste

No hazardous waste was observed or reported to be generated on the Subject. However, one former occupant, Chemcrete International at 2755 Campus Drive, Suite 125, was listed as a small quantity generator. The EPA ID number for the site, CAD982355927, has been inactive since 1998.

Additionally, 14 separate HAZNET listings were identified in the CER (see Section 6.2) for the Subject addresses. The listings were for the removal of asbestos-containing waste, organic solids, unspecified oil-containing wastes, and PCBs. Since no manufacturing activities occur at the Subject, these wastes are likely part of the general maintenance operations for the on-site equipment, and for asbestos waste generated during tenant improvement activities. Of note, each of the EPA numbers identified is noted as inactive on the State of California DTSC Hazardous Waste Tracking System. However, the DTSC system notes one active EPA ID, CAC002760637, for the address of 2600 Campus Drive, which according to Gary Wilson, the Chief Engineer, is for the removal of asbestos-containing floor mastic from that building.

As noted previously, none of the Subject addresses were identified on any regulatory databases that report releases or contamination conditions, such as the SHWS, LUST or SLIC databases. Based on the above information, these listings are not suspected to be of a significant environmental concern to the Subject.

### 7.4 Stained Soil, Stained Pavement, or Stressed Vegetation

There was no evidence of significant soil staining, stained pavement, or stressed vegetation observed on-site.

### 7.5 Liquid Discharges

No visible evidence of liquid discharges, suspected to represent an environmental concern were observed during our survey.

### 7.6 Pools of Liquid

IVI did not observe significant standing surface water or pools containing liquids likely to be hazardous substances or petroleum products.

### 7.7 Pits, Ponds, or Lagoons

No pits, ponds or lagoons suspected of containing hazardous substances or petroleum products were identified on-site.

### 7.8 Wells

IVI did not identify on-site dry wells, irrigation wells, injection wells, observation wells, monitoring wells, potable water wells, recovery wells or abandoned wells.

### 7.9 On-Site Fill

Based on our observations, other than typical engineered fill used in foundation construction, it does not appear that a significant amount of fill has been imported onto the Subject.

### 7.10 Drums and Containers for Storing Waste

With the exception of non-hazardous solid waste containers, IVI did not identify containers suspected of storing waste. With respect to the non-hazardous solid waste containers, no significant environmental concerns were noted.

### 7.11 Floor Drains and Sumps

IVI did not identify any floor drains or sumps that were stained, emitting foul odors, or connected to an on-site sewage disposal system, or located adjacent to chemical storage areas. Of note, all of the buildings, except POP 1 and POP 9, have a basement with a sump pump. In addition, POP 9 has a grease interceptor located in the kitchen of Campus Café. IVI has no significant environmental concerns regarding same.

### 7.12 Odors

IVI did not identify strong, pungent, or noxious odors suspected to represent an environmental concern.

### 7.13 Air Emissions

IVI did not identify processes or equipment that emit noticeable vapors or fumes.

### 7.14 Polychlorinated Biphenyls (PCBs)

#### Transformers

IVI observed numerous utility-owned, pad-mounted electrical transformers throughout the Subject. Based on their presumed age, these transformers may contain between 49-500 ppm of PCBs, which classifies them as PCB contaminated. In any event, the electrical equipment IVI observed appeared to be in good condition, free of leakage.

Moreover, in accordance with *Title 40—Protection of Environment, Chapter 1—Environmental Protection Agency, Subchapter R—Toxic Substance Control Act (TSCA), Part 761—Polychlorinated Biphenyls (PCBs), Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions*, the owner of the transformers, Pacific Gas & Electric (PG&E), is responsible for the transformers' maintenance and remediation in the event of a leak.

#### Elevators

IVI identified hydraulic elevators in all of the buildings except POP 1, and in the parking structure for POP 9. Since the elevators in POP 3, POP 4, POP 5, and POP 6 were likely installed prior to the 1979 ban on the manufacturing of PCB-containing hydraulic fluid, IVI is of the opinion that the elevator hydraulic fluid may contain PCBs. The elevators in POP 8 and POP 9 were installed after 1979, and PCB-contaminated hydraulic fluid is not likely to be found in these hydraulic elevator operating systems. No significant staining or pools of hydraulic fluid were observed around the elevator equipment in any of the buildings.

Of note, in 1994, an EPA ID number was issued to the Peninsula Office Park, 2600-2988 Campus Drive, for the removal of 1.2 tons of PCBs and/or materials containing PCBs. The area from which the PCBs were removed was not noted, but appears to have occurred in all of the buildings associated with the park. Since no manufacturing activities occur at the Subject, these wastes were likely part of the general maintenance operations for the on-site equipment, possibly for the hydraulic elevators.

### 7.15 Asbestos-Containing Material (ACM)

Based on the age of the site improvements, the potential presence of asbestos containing materials exists. IVI noted signs located near the roof access of the buildings identifying the presence of non-friable asbestos in roof penetration sealant. Signs were also noted in several of the basements regarding the presence

of non-friable asbestos in the firebrick insulation. Furthermore, the friable acoustical ceiling tiles are suspected to contain asbestos; and the non-friable resilient floor finish assemblies, wallboard assemblies, roofing materials, caulk, and mastics may contain asbestos. The Subject has an existing Asbestos Operations and Maintenance (O&M) Program which is adequate and in-use. Since the suspect ACM was observed to be in good condition, no further action is recommended at this time other than maintaining same in good condition under the existing Asbestos O&M Program.

Of note, Ms. Hernandez and Mr. Wilson indicated that at various times over the years, as tenants vacate office suites and new tenant improvements occur, samples of suspect asbestos-containing materials are collected. Most recently, samples were collected from POP 6, consisting of vinyl floor tile and mastic, baseboard, joint compound, and ceiling tiles. Asbestos was detected in samples of black floor tile mastic and was appropriately abated by a licensed contractor. In addition, EPA ID numbers were issued in 2007 and 2008 for the removal of asbestos-containing waste from POP 3 and POP 5.

### **7.16 Lead-in-Drinking Water**

Based on our conversations with utility personnel, the water at the Subject is not expected to contain elevated levels of lead.

### **7.17 Radon**

Based on statistical information maintained by the State of California Indoor Radon Program, radon concentrations in San Mateo County average 1.3 picocuries per liter (pCi/L), which is below the 4.0 pCi/L action level established by the USEPA and places the Subject in an EPA Radon Zone 3. Based solely on this data, it is unlikely that radon represents an environmental concern at this time.

### **7.18 Lead-Based Paint (LBP)**

Since portions of the Subject were constructed prior to the Consumer Product Safety Commission's 1978 ban on the sale of LBP to consumers and the use of LBP in residences, there is a potential that LBP may have been applied at the Subject. However, painted surfaces were observed in good condition. Furthermore, the Subject is only used for commercial purposes. Accordingly, IVI has no significant environmental concerns regarding LBP on-site.

### 8.1 Questionnaires

IVI sent a Pre-Survey Questionnaire and an AAI User Questionnaire to the site contact and the User, respectively. The purpose of these questionnaires was to disclose any previous or existing hazardous waste or toxic material conditions, which may not have been apparent at the time of our site reconnaissance and to satisfy the User interview all appropriate inquiry requirements.

As of this writing, neither the site contact nor the User has returned the completed questionnaires.

### 8.2 User

#### 8.2.1 Title Records

A copy of the Subject's Chain-of-Title has not been provided to IVI for review.

#### 8.2.2 Environmental Clean Up Liens and Activity and Use Limitations (AULs)

The User has not returned the AAI User Questionnaire.

#### 8.2.3 Specialized Knowledge

The User has not returned the AAI User Questionnaire.

#### 8.2.4 Relationship of Purchase Price to Fair Market Value Due to Contamination in Connection with the Subject

The User has not returned the AAI User Questionnaire.

#### 8.2.5 Common Knowledge or Reasonably Ascertainable Information

The User has not returned the AAI User Questionnaire.

#### 8.2.6 Purpose for Conducting the Phase I Environmental Site Assessment

The User has not returned the AAI User Questionnaire.

#### 8.2.7 Proceedings Involving the Property

The User has not returned the AAI User Questionnaire.

### 8.3 Key Site Manager

#### 8.3.1 Historic Site Use

According to Michelle Hernandez, the General Manager, the site contact, who has been involved with the property for the past seven years, the Subject buildings were constructed at various times between 1971 and 1998.

According to Gary Wilson, the Chief Engineer, who has been involved with the property for the past 35 years, the Subject buildings were constructed at various times between 1971 and 1998. Mr. Wilson stated that the land currently occupied by POP 9 originally contained Borel's Restaurant. All of the other buildings were constructed on previously unimproved land.

#### 8.3.2 Proceedings Involving the Property

Neither Ms. Hernandez nor Mr. Wilson had any knowledge of pending, threatened, or past litigation, administrative proceedings, or notices from governmental agencies regarding violations of environmental laws regarding hazardous substances or petroleum products.

### 8.4 Occupants

No occupants, other than Ms. Hernandez and Mr. Wilson, were interviewed.

### 8.5 Past Owners

IVI was unable to locate the site's former owner.

### 8.6 Local Regulatory Agency Interviews and/or File Reviews

#### Fire Department

IVI has sent a request to the City of San Mateo Fire Department for environmental information pertaining to the subject property. As of this writing, the Fire Department has not responded to our request. Should receipt of a response from the Fire Department change the conclusions of this report, the Client will be notified in writing by IVI.

#### Health Department

IVI has sent a request to the County of San Mateo Health Department for environmental information pertaining to the subject property. As of this writing, the Health Department has not responded to our request. Should receipt of a response from the Health Department change the conclusions of this report, the Client will be notified in writing by IVI.

### **Tax Assessor**

A cursory review of property tax files did not identify any environmental liens with respect to the subject property.

### **Department of Planning and Zoning**

Review of available zoning records maintained by the City of San Mateo Planning Department indicates that the Subject is currently zoned E1-1 Executive Park. According to the planning and zoning records, no additional zoning changes were listed for the Subject.

IVI conducted a “Tier I” (non-intrusive) Vapor Encroachment Screening (VES) on the Subject in accordance with the methodology set forth in ASTM E 2600-10 “*Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*”. During the VES, the Area of Concern (AOC) was minimized using the methodology taught in the ASTM Screening for Vapor Encroachment onto Property Involved in Real Estate Transactions Training Course. The purpose of the Tier I VES is to conduct an initial screen to identify, to the extent feasible, the potential for a vapor encroachment condition (VEC) in connection with the Subject with respect to chemicals of concern that may migrate as vapors into the subsurface of the Subject as a result of contaminated soil and groundwater on or near the property.

This VES utilized readily available data sources previously discussed in this Phase I ESA to include the type of soils, geology and groundwater characteristics of the Subject area (refer to Section 4.3) as well as known or potentially contaminated sites as identified on Federal, State, tribal and local databases. IVI also utilized previously discussed standard historical sources of information to identify potential historical sources of contamination on the Subject and surrounding properties which may be indicative of a VEC. This data collection and analysis was coupled with our site reconnaissance of the Subject and surrounding properties. Based upon the results of our data collection, reconnaissance and analysis, a summary of our Tier I VES findings is presented in the table below:

Potential for Vapor Encroachment to Impact the Subject	
Area of Concern	Conclusion
Subject Property Operations or Existing Conditions	None identified
Historical Uses of the Subject Property	None identified
Adjoining Property Operations or Existing Conditions	None identified
Historical Uses of Adjoining Properties or Nearby Properties	None identified
Regulatory Review of sites identified on Federal, State, tribal and Local Environmental Databases which were located in Approximate Minimum Search Distance (AMSD)	Several Identified, but none of concern.

Based on the above, a VEC is not a significant environmental concern.

## **10.0 FINDINGS, CONCLUSIONS AND RECOMMENDATIONS**

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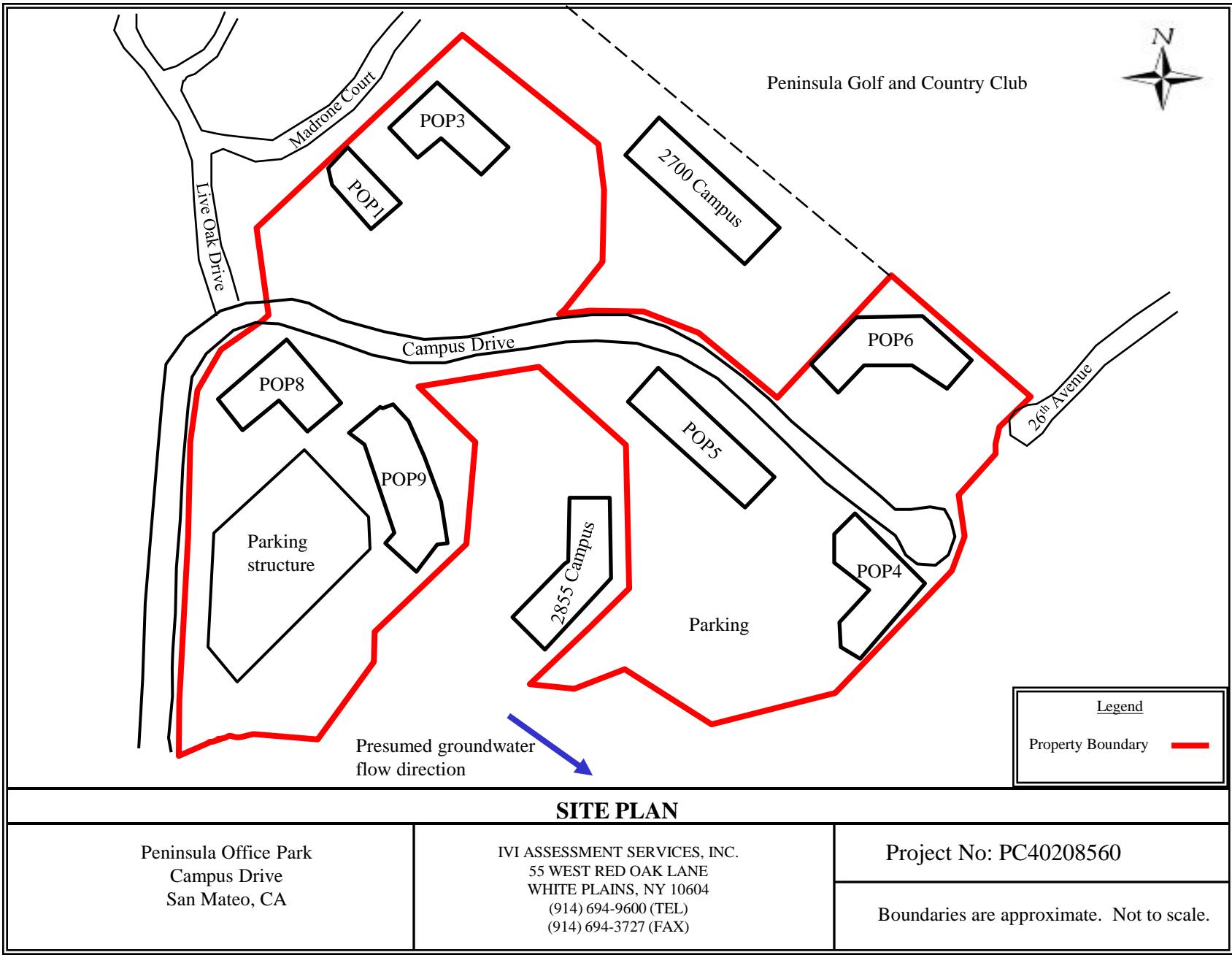
Peninsula Office Park  
San Mateo, California

IVI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E1527-13 of the Peninsula Office Park at 2600, 2655, 2755, 2800, 2929, 2955, and 2988 Campus Drive, San Mateo, California. Any exceptions to, or deletions from, the standard practice are described within Section 2.0 of this report.

This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the Subject; however, the following item of potential environmental concern was identified which warrants mention:

### **Asbestos-Containing Material (ACM)**

Based on the age of the site improvements, the potential presence of asbestos containing materials exists. IVI noted signs located near the roof access of the buildings identifying the presence of non-friable asbestos in roof penetration sealant. Signs were also noted in several of the basements regarding the presence of non-friable asbestos in the firebrick insulation. Furthermore, the friable acoustical ceiling tiles are suspected to contain asbestos; and the non-friable resilient floor finish assemblies, wallboard assemblies, roofing materials, caulking, and mastics may contain asbestos. The Subject has an existing Asbestos Operations and Maintenance (O&M) Program which is adequate and in-use. Since the suspect ACM was observed to be in good condition, no further action is recommended at this time other than maintaining same in good condition under the existing Asbestos O&M Program.



This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE  
November 01, 2018



**Owner Mailing Contact:**

Hudson Peninsula Office Park, LLC  
2655 Campus Dr #100  
San Mateo , CA 94403  
Attn: Gary Wilson



**Facility ID:** 16529

Hudson Peninsula Office Park, LLC  
2955 Campus Drive  
San Mateo , CA 94403

**Owning Entity:**

Hudson Peninsula Office Park, LLC



**DEVICES**

This document serves as your Permit to Operate the following:

**S1**

**Permitted**

Emergency Back-up Generator,  
Diesel Internal Combustion Engine  
Stationary, Emergency Standby  
160 BHP Cummins 1996

Authorized emissions flows from this device:  
S1 --> P1

The operating parameters described above are based on information supplied by the permit holder and may differ from the limits set forth in the attached conditions of this Permit To Operate. The limits of operation in the permit conditions are not to be exceeded. Exceeding these limits is considered a violation of BAAQMD and is subject to enforcement action.



**PERMIT CONDITIONS**

The devices described in this document are subject to the following permit conditions:

**S1** Subject to Condition #: **22820**

**Condition #:** 22820   **S1**

1. The owner/operator shall not exceed 20 hours per year per engine for reliability-related testing.  
Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]
2. The owner/operator shall operate each emergency standby engine only for the following purposes: to mitigate emergency conditions, for emission testing to demonstrate compliance with a District, State or Federal emission limit, or for reliability-related activities (maintenance and other testing, but excluding emission testing). Operating while mitigating emergency conditions or while emission testing to show compliance with District, State or Federal emission limits is not limited.  
[Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]
3. The owner/operator shall operate each emergency standby engine only when a non-resettable totalizing meter (with



This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE  
November 01, 2018

a minimum display capability of 9,999 hours) that measures the hours of operation for the engine is installed, operated and properly maintained.

[Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

4. Records: The owner/operator shall maintain the following monthly records in a District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). Log entries shall be retained on-site, either at a central location or at the engine's location, and made immediately available to the District staff upon request.
  - a. Hours of operation for reliability-related activities (maintenance and testing).
  - b. Hours of operation for emission testing to show compliance with emission limits.
  - c. Hours of operation (emergency).
  - d. For each emergency, the nature of the emergency condition.
  - e. Fuel usage for each engine(s).

[Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

5. At School and Near-School Operation:

If the emergency standby engine is located on school grounds or within 500 feet of any school grounds, the following requirements shall apply:

The owner/operator shall not operate each stationary emergency standby diesel-fueled engine for non-emergency use, including maintenance and testing, during the following periods:

- a. Whenever there is a school sponsored activity (if the engine is located on school grounds)
- b. Between 7:30 a.m. and 3:30 p.m. on days when school is in session.

"School" or "School Grounds" means any public or private school used for the purposes of the education of more than 12 children in kindergarten or any of grades 1 to 12, inclusive, but does not include any private school in which education is primarily conducted in a private home(s). "School" or "School Grounds" includes any building or structure, playground, athletic field, or other areas of school property but does not include unimproved school property.

[Basis: Title 17, California Code of Regulations, section 93115, ATCM for Stationary CI Engines]

**END OF CONDITIONS**



**IMPLIED CONDITIONS**

Unless your specific permit conditions state otherwise, the throughputs, fuel and material consumptions, capacities and hours of operation described in your permit application will be considered maximum allowable limits.

A new permit will be required before any increase in parameters, such as throughputs, fuel and material consumption, capacities, and hours of operation, or change in materials, equipment or permit conditions may be made.



This document does not permit the holder to violate any BAAQMD regulation or any other law.

**PERMIT EXPIRATION DATE**  
November 01, 2018



#### **RIGHT OF ACCESS**

In accordance with Regulation 1-440, BAAQMD shall be granted the right of access to any premises on which an air pollution source is located for the purposes of:

- a) The inspection of the source,
- b) The sampling of materials used at the source,
- c) The conduct of an emission source test, and
- d) The inspection of any records required by BAAQMD rule or permit condition



This Permit To Operate does not authorize violations of the rules and regulations of BAAQMD (may be viewed at [www.baaqmd.gov](http://www.baaqmd.gov)), California or Federal law. Compliance with conditions in this permit does not mean that the permit holder is currently in compliance with BAAQMD Rules and Regulations. It is the responsibility of the permit holder to have knowledge of and be in compliance with all BAAQMD rules and regulations.



This document does not permit the holder to violate any BAAQMD regulation or any other law.

PERMIT EXPIRATION DATE  
November 01, 2018

## Reported Source Emissions

For Renewal Period 11/1/2015 to 11/1/2017

Source	Facility Source Description	Annual Average lbs/day				
		PM	Org	NOx	SO2	CO
S1	Emergency Back-up Generator	0.00	0.00	0.00	0.00	0.00
	<b>TOTALS</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

### Prioritization Score: 0

*Prioritization scores are calculated based on the quantity of toxic air contaminant emissions, the toxicity of the toxic air contaminants, and the proximity of the facility to potential receptors such as residences, hospitals, schools, and workers.*

**END OF DOCUMENT**



BAY AREA AIR QUALITY  
MANAGEMENT DISTRICT

**PERMIT  
TO OPERATE**

This document does not permit the holder to violate any BAAQMD regulation or any other law.

**PERMIT EXPIRATION DATE**  
OCT 1, 2019

Plant# 24063

Hudson Peninsula Office Park  
2955 Campus Drive  
San Mateo, CA 94403

Location: 2655 Campus Drive  
San Mateo, CA 94403

**Registration**

S#	DESCRIPTION	[Schedule]	PAID
2	Industrial Boiler - Other, 2500K BTU/hr max, Natural gas Boiler (2655 Campus Dr.)	200 [R, 730 days]	

---

1 Registered Source

# ENVIRONMENTAL HEALTH

SAN MATEO COUNTY



**PERMIT 16- 1136**

## CERTIFIED UNIFIED PROGRAM AGENCY

### THIS PERMIT IS ISSUED FOR THE FOLLOWING:

2160 PR0052037 STORES MV FUELS OR WASTE ONLY

#### FACILITY:

HUDSON PACIFIC PROPERTIES LLC  
2955 CAMPUS DR B100  
SAN MATEO, CA 94403

#### OWNER:

HUDSON PACIFIC PROPERTIES LLC  
2800 CAMPUS DR., STE 125  
SAN MATEO CA 94403

FA0032772

**DATE ISSUED:** 7/1/2016

**EXPIRATION DATE:** 7/1/2021

Heather Forshey, MS, REHS

DIRECTOR, ENVIRONMENTAL HEALTH SERVICES

**THIS PERMIT IS NONTRANSFERABLE AND MUST BE POSTED ON-SITE IN A CONSPICUOUS PLACE**



October 20, 2004

Mr. Paul Saccone  
Vice President Engineering and Construction  
Equity Office Properties Trust  
Two North Riverside Plaza, 22<sup>nd</sup> Floor  
Chicago, IL 60606

**Subject: Asbestos Guidance Manual for Equity Office Properties  
MACTEC Project No. 6380-03-0152.05**

Dear Mr. Saccone:

MACTEC Engineering and Consulting, Inc. (MACTEC) is pleased to submit this Updated Asbestos Guidance Manual. This updated manual is intended as a replacement to the manual issued July, 1999, MACTEC Project No. 52030-9-1928-01-606. This manual is being provided to Equity Office Properties Trust (Equity) in electronic form.

MACTEC appreciated the opportunity to serve as your consultants for this update and looks forward to our continued association with Equity.

Sincerely,

**MACTEC ENGINEERING AND CONSULTING, INC.**

*Shawn E. Brigham/sy*  
Shawn E. Brigham  
Project Manager

*Brian J. DuChene*  
Brian J. DuChene  
Principal Professional

*Equity Asbestos O&M 10-20-2004 Final.doc*

MACTEC Engineering and Consulting, Inc.  
4150 North John Young Parkway  
Orlando, Florida 32804  
407-522-7570 • 407-522-7576 FAX

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## **i. INTRODUCTION**

This Manual is divided into three main sections:

### **1.0 ASBESTOS HEALTH EFFECTS AND REGULATIONS**

This section is designed to meet the asbestos “Construction Industry” and General Industry minimum two-hour Awareness Training, as required by OSHA. This training is to be given annually to employees who work in areas of buildings where asbestos containing materials (ACM) are present, and whose work activities may reasonably cause the employees to come in contact with ACM. The discussion of Class I, II, or III (see section 1.5 for definitions) work practices and engineering controls are beyond the scope of this awareness training.

### **2.0 ASBESTOS MANAGEMENT**

This section is intended to provide general and typical guidance for an Asbestos Coordinator in the management of asbestos in place. The material in this section, when properly supplemented with appropriate site-specific information (see Section 3.0), may be used as an Operations and Maintenance (O&M) Program Manual.

### **3.0 SITE SPECIFIC ASBESTOS INFORMATION**

This section will include site specific asbestos information as included by the Asbestos Coordinator and Competent Person.

MACTEC Engineering and Consulting, Inc. (MACTEC) has based the recommendations within this manual on its previous experience and on the application of generally accepted technology for reducing human asbestos exposure.

This manual was developed to provide general awareness and guidance regarding the presence of asbestos-containing materials within typical office facilities. MACTEC cautions that application of the general information contained in this manual to all site-specific situations may not be appropriate for all situations, and is beyond the control of MACTEC. Application of the appropriate regulations and decisions concerning site-specific conditions shall be Equity's responsibility. MACTEC recommends that a qualified Asbestos Management Planner or Competent Person supervise all work covered under the OSHA Asbestos Regulations. In the text of this document, the Competent Person is anticipated to be the Equity Office Properties Regional Engineer, Vice President of Engineering and Construction or the Senior Vice President of Design and Engineering. When duties within this document are assigned to the Competent Person, it is further anticipated that the Equity Office Properties Competent Person will be working in conjunction with the Contractor's on-site Competent Person, as applicable. The Asbestos Coordinator is intended to be the on-site building engineer representing Equity Office Properties.

A glossary of technical terms is provided in Appendix P.

## ii. ACTIVITY REFERENCE GUIDE

Activity Requiring Action	Action Required	Section	Responsible Person
New employee hired.	Determine if employee's work will contact/disturb asbestos. IF SO, THEN:  Obtain & file a signed Employee Notice  Facilitate Initial/Annual Training	1.5.3 & 2.3.1  2.5.1  2.4	Coordinator  " "  " "
Maintenance or engineering work in areas where asbestos is present.	Determine OSHA Work Class  IF MATERIAL WILL BE DISTURBED, THEN: Do not disturb it, engage abatement contractor  Ensure proper work practices  Issue Work Control/Permit	1.5  2.8  1.5.4  App. H	Competent Person  " "  Coordinator  Coordinator
Outside contractor on-site to do maintenance or repair work in areas where asbestos is present.	Obtain and file signed Contractor/Tenant Notice  Determine OSHA Work Class  Issue Work Control/Permit	2.5.1  1.5  App. H	Coordinator  Competent Person  Coordinator
New custodial firm doing housekeeping in areas where asbestos is present.	Obtain and file signed Cleaning Contractor Employer Notice  Ensure proper work practices	2.5.1  1.6.4	Coordinator  Coordinator
Renovation or demolition project. (Tenant Improvement Work)	Determine whether asbestos is present within project limits  IF SO, THEN: Determine Response Action  Determine OSHA Work Class  Issue Work/Control Permit  Obtain Bids  Engage Consultant for Air Monitoring  Provide notifications as appropriate  Ensure proper work practices  Keep project records	2.9.1  2.9.2  1.5  App. H  2.9.2  2.7.4  2.9.4  2.9.5  2.6.8	Coordinator  Competent Person  " "  Coordinator  " "  " "  " "  " "  " "
Emergency involving disturbance of asbestos.	Implement Emergency Response	1.8	Coordinator
Periodically assess for changes in material condition.	Perform periodic surveillance  Perform Hazard Assessment  Determine need for Air Monitoring  Determine Response Actions  Determine need for signs/labels - Ensure posting where needed	2.3.3  2.3.3  2.7.1  2.3.3  1.6	Coordinator  " "  " "  Competent Person  Coordinator

## 1.0 ASBESTOS HEALTH EFFECTS AND REGULATIONS

### 1.1 OVERVIEW

Airborne microscopic asbestos fibers pose a health hazard to humans. Certain activities can release asbestos fibers to the air. "Friable" asbestos is more susceptible to fiber release than non-friable material. A material is friable when it is capable of being crumbled, pulverized, or reduced to powder by hand pressure. Asbestos-containing materials usually become more friable with age. Water or physical damage caused by maintenance or other personnel could result in increased friability. Any one or a combination of factors could result in significant increases in airborne asbestos fiber levels and may be cause for facility management personnel to re-evaluate the potential hazard and take further or additional corrective actions.

There are no state, United States Environmental Protection Agency (EPA), or United States Occupational Health and Safety Administration (OSHA) regulations mandating removal of ACM from an office or commercial building. In Guidance for Controlling Asbestos-Containing Materials in Buildings (EPA 560/5-85-024, June 1985), the EPA states: "*The presence of asbestos in a building does not mean that the health of building occupants is necessarily endangered. As long as asbestos-containing material (ACM) remains in good condition and is not disturbed, exposure is unlikely. When building maintenance, repair, renovation or other activities disturb ACM, or if it is damaged, asbestos fibers may be released creating a potential hazard. Although not required to do so by federal law, the prudent building owner will take steps to limit building occupants' exposure to airborne asbestos.*"

In Managing Asbestos In Place (EPA document 20T 2003 the "Green Book", July 1990), where ACM has been identified and is not to be removed immediately, EPA recommends that a pro-active Operations and Maintenance (O&M) program be implemented.

The 1994 OSHA regulations take a risk-based approach to classify the activities more likely to create elevated airborne concentrations of asbestos. Equity's facilities can be categorized into three groups:

- 1) Facilities with asbestos containing spray-applied fireproofing. These facilities have the potential for frequent contact with ACM fireproofing debris by engineering and service personnel.
- 2) Facilities built prior to 1981. OSHA has identified facilities built before 1981 to have a greater potential for ACM to be present. The regulations mandate presumption of certain materials as ACM.
- 3) Facilities built after 1980. The OSHA regulations indicate that it is "much less likely" that facilities built after 1980 contain asbestos. However, owners and operators are still required to exercise "due diligence" and "to investigate materials installed after 1980 when they suspect the materials may be asbestos containing." This manual should be consulted unless a certified "Asbestos Inspector" declares a facility "asbestos free". Equity's Competent Person should make site-specific determinations regarding the applicability of the Surveys and Surveillance, Notifications, and Training of Building Staff sections of this manual.

## 1.2     HEALTH EFFECTS OF ASBESTOS EXPOSURE

Most of the information on the health effects of exposure to asbestos has been derived from studies of workers exposed to asbestos in the course of their occupation. Asbestos fiber concentrations for such workers are many times higher than those encountered by the general public, or by most workers in buildings with asbestos-containing material (ACM). Because their exposure was much higher, asbestos workers will have a much higher incidence of asbestos-related diseases than people who live or work in buildings with ACM will. This is known as the dose-response effect. However, people in buildings with ACM are still likely to experience higher risks than the public at large. Unfortunately, the available data does not allow us to reliably estimate the actual risk.

Because asbestos fibers appear to be ubiquitous, virtually everyone is exposed to some extent. During autopsy, asbestos fibers have been detected in the lungs of most urban residents. Exposure of the general public is troublesome, because we are talking about a large population that includes unhealthy as well as healthy persons. Moreover, exposure may begin during childhood, leaving a long period for the manifestation of asbestos-related disease. Furthermore, asbestos may enhance the carcinogenic effects of other materials. Thus, additional exposure to asbestos caused by living or working in buildings with ACM should be avoided.

To be a significant health concern, asbestos fibers must be inhaled.

The body has several mechanisms by which it filters the air it breathes. The tiny hairs in the nose filter out dust and airborne particles. Like the nose, the trachea and the bronchi are lined with small fine "hairs" called cilia. Together with mucus secreted by cells lining the airways, cilia trap particles and help prevent respiratory infections. The cilia beat in an upward direction sweeping foreign particles up the back of the mouth from where they are expelled or swallowed. Enzymes called lysozymes in the mucus cells also attack viruses and bacteria. Microbes that slip through are usually handled by white blood cells called phagocytes that envelop and eat these invaders in the lung.

Cigarette smoking temporarily paralyzes the cilia. If smoking continues long enough, the cilia wither and die. They are never replaced. The efficiency of the cilia is replaced by the smoker's inefficient cough, which attempts to rid the respiratory tract of foreign particles and excess mucus.

Dirty, contaminated air presents the greatest challenge to the respiratory system. Some of the particles entering the airways reach the alveoli. When this occurs, white blood cells called macrophages attempt to engulf and digest the particles. In the case of asbestos, we are dealing with a mineral fiber, a substance which macrophages can often not successfully attack. As a means of secondary defense, the macrophages deposit a coating on the fibers, which are then deposited in the small passages. Here they clog and actually scar the tissues. The walls of the alveoli lose their elasticity and useful function in respiration. Coated asbestos fibers ("asbestos bodies") are often seen at autopsy.

Asbestos is known to be hazardous based on studies of asbestos workers and laboratory animals. However, the risks associated with low-level, non-occupational exposure (for example, as an occupant of a building containing ACM) are not well established. Attempts have been made to estimate low-level risks by extrapolation from occupational exposure data. This is not a straightforward process and its validity is questionable.

Based on a thorough review of the health effects literature, the EPA concludes: there is no level of exposure below which the risks of contracting an asbestos-related disease are not zero. That is, there is no threshold level of exposure.

A 1984 survey sponsored by EPA attempted to assess exposure to ACM in public and commercial buildings. According to the data, a lower percentage of public and commercial buildings contain friable ACM than do school buildings (20% vs. 35%). However, limitations in the data prevent firm conclusions regarding the number of persons exposed, exposure levels, or the exposure levels of service/maintenance workers in comparison with the public.

Asbestos fibers accumulate in the lungs. As exposure increases, the risk of disease likewise increases. Measures to minimize exposure and consequently minimize the accumulation of fibers, reduce the risk of adverse health effects.

Modern knowledge concerning asbestos and a lung disease called asbestosis dates to 1900. Autopsy reports from 1938-1949 indicated that a large number of persons who died with asbestosis also had lung cancer. In the 1960s, the link between asbestos and a rare form of cancer called mesothelioma was established. These diseases are discussed below:

Asbestosis is a scarring (fibrosis) of the lung. The scarring impairs the elasticity of the lung tissue and hampers its ability to exchange gases. This leads to inadequate oxygen intake to the blood. The disease restricts breathing leading to decreased lung volume, and it increases resistance in the airways. These last two impairments make the actual act of breathing difficult. It is a slowly progressive disease with a latency period of 15-30 years. Asbestosis is irreversible and may progress even after exposures to asbestos have ceased. The earliest symptom of asbestosis is often coughing. As the disease progresses, shortness of breath upon exertion is noted. Changes in pulmonary (lung) function, rales (crackling sounds in the lower half of the lung), and clubbed fingers are disease markers. As the disease advances, x-rays of the chest will help demonstrate the incidence of fibrosis, although a lung biopsy provides the only definitive diagnosis. Relatively high doses of exposure are needed before asbestosis is observed. While there is no cure for asbestosis, anyone suffering with the disease should be removed from further exposure, as eliminating further inhalation of asbestos fibers can prevent more disabling fibrosis.

Lung cancer is a malignant tumor of the bronchi covering. The tumor grows through surrounding tissue, invading and often obstructing the air passages. The earliest symptom is often a persistent cough; a physical exam may attribute the symptoms to chronic bronchitis. Chest x-rays sometimes show shadows that indicate tumors and enlarged lymph nodes. However, the definitive diagnosis of lung cancer is based upon microscopic examination of lung

tissue. The time between exposure to asbestos and the occurrence of lung cancer is 20-30 years. Although there are many causes of lung cancer, a clear increase in risk has been found among people who work with asbestos. Moreover, there is no threshold or limit of exposure below which the risk of lung cancer is not increased.

Mesothelioma is a cancer of the mesothelium – the lining of the chest or the lining of the abdominal wall. It is considered to be a marker disease for asbestos exposure. Early stages are associated with few symptoms. By the time it is diagnosed, it is almost always fatal. Effective therapy does not exist. There is no exposure threshold for mesothelioma. This is suggested by the observation that family members of asbestos-exposed workers have developed mesothelioma. Presumably cleaning the clothes of the exposed worker has exposed these individuals to asbestos dust that led to the disease. Similar to other asbestos-related diseases, mesothelioma has an extended latency period: 30-40 years.

Other diseases and adverse health effects have been noted among the population exposed to asbestos fibers. Increased incidences of nonrespiratory cancers have been observed in some recent epidemiological studies. Cancers of the larynx, esophagus, stomach, colon-rectum, kidney and pancreas are present at slightly higher than predicted levels. An abnormality found on x-rays of persons exposed to asbestos is pleural plaque, a fibrous thickening of the lining of the chest cavity. These are usually not symptomatic of asbestos diseases and require no treatment. However, they tend to increase the statistical likelihood of eventually developing lung cancer. Pleural plaques are found in exposed workers as well as in the members of his or her family. Plaques are also found in people living near mines, shipyards, and manufacturing plants where asbestos is utilized.

#### Relationship Between Asbestos and Smoking

Cigarette smoking is the single most important known cause of lung cancer in humans. People who smoke 20 cigarettes per day increase their risk of developing lung cancer by ten-fold (10X) when compared to the non-smoker. Workers exposed to the same level of asbestos as insulation workers historically increase their risk of developing lung cancer by five-fold (5X). **These two factors working together have a synergistic effect; the smoker exposed to asbestos fibers is at least fifty times (50X) more likely to develop lung cancer than the general public.**

Accordingly, OSHA regulations require that attendees be encouraged to quit smoking. Many local agencies conduct smoking cessation programs. A listing of public health organizations that provide such assistance is provided in Appendix J of the Construction Industry Standard (see Appendix D of this manual).

### 1.3 DISCUSSION OF ASBESTOS CONTAINING MATERIALS

Asbestos is a naturally occurring mineral. It is distinguished from other minerals because its crystals form long, thin fibers. Deposits of asbestos are found throughout the world. Asbestos minerals are divided into two groups – serpentine and amphibole. The distinction between groups is based upon crystalline structure.

There are six recognized types of asbestos:

Chrysotile, the only mineral in the serpentine group, is the most commonly used type of asbestos and accounts for approximately 95% of the asbestos found in buildings in the United States.

Five types of asbestos are found in the amphibole group. They include:

Amosite is the type second most likely to be found in buildings.

Crocidolite was commonly used in high temperature insulation applications.

Anthophyllite, tremolite, and actinolite are extremely rare and of little commercial value. Occasionally they are found as contaminants in ACM.

While it is often possible to “suspect” that a material or product is, or contains asbestos, by visual determination, actual determinations can only be made by instrumental analysis. The EPA requires that the asbestos content of suspect materials be determined by collecting bulk samples and analyzing them by polarized light microscopy (PLM). The PLM technique determines the type of asbestos and estimates the percent asbestos in the bulk material.

EPA and OSHA define ACM as bulk material containing asbestos minerals in concentrations greater than 1%.

Friable materials are those that can be crushed or reduced to powder with hand pressure when dry, and can easily release asbestos fibers.

Current OSHA regulations designate surfacing materials and thermal system insulations found in buildings constructed prior to 1981 as presumed asbestos-containing materials (PACM). Resilient flooring installed prior to 1981 must be treated as ACM. Sampling of these materials is required to rebut this designation. If the designation is not rebutted, the materials must be treated as ACM (refer to Section 2.3). Building owners and employers are to exercise due diligence in determining whether miscellaneous materials are ACM.

General classes of materials found to contain asbestos include:

### **1.3.1 Surfacing Materials**

#### Spray-Applied

Asbestos-containing fireproofing is generally spray-applied onto a building's structural elements. It typically interfaces HVAC return air plenums above ceilings. Due to friability and possible erosion from airflow, the potential for asbestos fiber release from the spray-applied fireproofing is high. Disturbance of the material should always be done utilizing protective measures. Spray-applied acoustic ceilings or wall textures may also contain asbestos. Until removal is feasible, the material should be routinely monitored for damage, deterioration, or fallout.

#### Troweled-On

Asbestos has been used in surfacing materials for several purposes: as wall and ceiling plasters, as troweled-on textured finishes, and as fireproofing troweled onto a building's structural elements. Additionally, drywall joint compounds have been found to contain asbestos. The EPA allows the joint compound to be considered integral with the gypsum drywall to form a single composite system. OSHA guidance indicates the two materials must be analyzed and considered separately. It should be noted that drywall joint compound used at wallboard joints and over nails/screws is not considered a surfacing material and thus, not considered PACM.

### 1.3.2 Thermal System Insulation

Asbestos-containing insulation on piping and equipment takes many forms including chalky mixtures of magnesia and asbestos, preformed fibrous asbestos wrapping, asbestos fiber felt, and insulating cement. In most cases, the insulating material is covered with a protective jacket (lagging) made of cloth, tape, paper, metal or cement. The coatings and laggings on pipes and equipment minimize spontaneous fiber release and help protect against impact disturbances.

Damage from physical impact or water leaks is relatively easy to observe. However, the damaged ACM insulation is not often easily accessible and, due to high temperatures and restrictions on service interruptions, is not easily repaired. Disturbance to the insulating material is also often caused by pipe repair, maintenance, and non-related nearby activity, which may occur during normal maintenance activities.

Where damage to pipe or equipment covering is isolated, properly performed repair of the damaged material is an effective method of control. Where large portions of material must be removed, however, extensive protective measures should be taken (Class I Work). If small sections of insulation must be disturbed for replacement of pipes, valves or other mechanical equipment, the affected area can be sealed in a plastic containment (Class III Work – glove bag) and the ACM removed in a procedure, which isolates it from the local environment.

### 1.3.3 Miscellaneous Materials

#### Floor Tile/Sheet Vinyl Flooring and Mastic

Asbestos-containing resilient flooring, floor tiles, and mastics installed prior to 1981 are assumed ACM. Newer products may also contain asbestos. For those materials considered to be ACM, floor tile in good condition is considered to be non-friable unless disturbed. The mastic beneath the floor tiles is well bound and is also considered non-friable. The level of potential fiber release from these materials is greatly dependent on the degree of damage caused by personal activity, repairs, and/or renovations.

#### Ceiling Tile

Asbestos has been used in certain types of ceiling tiles. Ceiling tiles are a readily accessible material and therefore, have a high potential for fiber release. Suspended ceiling tiles generally are friable, and

therefore vulnerable to physical damage from periodic maintenance. They may also be subject to vibration from mechanical equipment, water damage from pipes, or surface erosion if used as an air plenum or near a forced air stream (e.g., air from a heating vent).

#### Roofing Materials

Roofs with built-up layers are likely to contain asbestos materials. However, the bitumen used in roofing construction acts as an encapsulant, binding together asbestos fibers and offering resistance to damage from impact. The composition of the alternating layers of felt and bitumen also form a stable and generally non-friable material. Non-metallic roof flashing materials and roofing mastics also may contain asbestos. However, access to roof tops is usually limited, posing little threat of exposure to building occupants.

Precautions (i.e., worker protection) should be taken prior to any actions, which would disturb the asbestos-containing roofing materials. This includes re-roofing, repairs to roofing or sidewall flashing, any coring or cutting for mechanical or electrical penetrations, and the addition or removal of rooftop equipment.

#### Other Miscellaneous Materials

A partial list of the more common miscellaneous asbestos containing materials in office facilities includes:

- Packing around pipes and floor or wall penetrations
- Fabric used for ductwork expansion joints
- Cement used to seal joints of air ducts
- Elevator brake pads/equipment panels
- Gaskets
- Fire doors
- Cooling tower panels

- Cement asbestos (“Transite”) siding and piping
- Sound deadening material on stainless steel sinks
- Insulating paper
- Vinyl wall coverings
- Other adhesives, mastics, caulking or putties
- Spackling or wall texture compounds

## **1.4 OSHA AND EPA REGULATIONS**

The listing of federal asbestos regulations and guidance documents is given in Appendix A.

There are currently two federal government agencies responsible for the regulations regarding exposure to asbestos at commercial facilities: the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA). The occasionally referenced National Institute for Occupational Safety and Health (NIOSH) is an independent entity, which is the research arm of OSHA.

### **1.4.1 EPA**

The most relevant EPA Regulations include a 1973 ban on spray-applied ACM for insulating or fireproofing purposes. This was later amended in 1975 to include molded or wet applied insulation and again, in 1978, to include decorative application. The EPA National Emissions Standards for Hazardous Air Pollutants (NESHAP), dated November 10, 1990, state that “the owner or operator of a demolition or renovation activity and prior to the commencement of the demolition or renovation, thoroughly inspect the affected facility or part of the facility where the demolition or renovation operation will occur for the presence of asbestos.” 40 CFR Part 61, Subpart M requires asbestos to be properly handled during renovation, demolition and disposal.

For an abstract of the rules and the text of the EPA NESHAP regulation, refer to Appendix B.

The Asbestos Hazards Emergency Response Act (AHERA), 40 CFR Part 763, is an EPA regulation which requires local education agencies to identify friable and nonfriable ACM in public and private elementary and secondary schools. Visual inspection of school buildings for such materials if they are not assumed to be ACM and sample analysis by appropriate techniques are referred to in this rule. In addition local education agencies are required to use persons who have been accredited to conduct inspections, reinspections, develop management plans, or prepare response actions.

The Asbestos School Hazard Abatement Reauthorization Act (ASHARA), 40 CFR Part 763, is the EPA regulation that amended AHERA to extend some of the training and accreditation requirements to persons performing such work in public and commercial buildings. Accreditation as a management planner is not required in order to prepare an ACM management plan. A person who inspects for ACM must be an accredited inspector. A person must be accredited as a worker, contractor/supervisor, or project designer to carry out, supervise or design, respectively, any of the following activities with respect to friable ACM:

1. A response action other than a small-scale short-duration activity.
2. A maintenance activity that disturbs friable ACM other than a small-scale short-duration activity.
3. A response action for a major fiber release episode.

#### **1.4.2 OSHA**

The OSHA asbestos regulations were first issued in 1971 and amended in 1976, 1986, 1988, 1994 and 1995. They specify airborne exposure standards, engineering controls, work practices, medical surveillance, and worker protection requirements. The current OSHA rules are divided into three sets of regulations: one covering the Construction Industry (29 CFR 1926.1101), one covering the Shipyard Industry (29 CFR 1915.1001), and one covering General Industry (29 CFR 1910.1001). The Construction Industry Standard applies to individuals engaged in building maintenance, repair, renovation (including remodeling and decoration), and demolition, or in asbestos control (enclosure, encapsulation, or removal of ACM). The Shipyard Industry includes all work performed on ships or vessels. The General Industry Standard applies to facilities with ACM present, where workers may be exposed to airborne asbestos.

Both the Construction Industry and General Industry regulations can apply to workers in a building with ACM. For example, both office workers and service personnel (housekeeping and maintenance staff) are covered by the General Industry regulations, since asbestos is present in the

facility. Workers are also covered by the Construction Industry regulations when they perform maintenance, repair, renovation, or asbestos abatement tasks. Outside contractors (e.g., electricians, plumbers, carpenters, and asbestos contractors) are covered by the Construction Industry regulations.

The text of the OSHA General Industry and Construction Industry regulations is provided in Appendix D. A summary of the important points covered in these OSHA asbestos regulations is included in Appendix C. It is intended to be used by the Asbestos Coordinator as a first check to see if there are immediately apparent regulatory issues that would need to be addressed in a particular situation.

#### **1.4.2.1 *Classes of Work***

The OSHA Construction Industry regulations include a scheme, which ties work classifications to the type of material being removed or the intent of the work. OSHA specifies minimum work practices and engineering controls, training requirements and respirator protection for each class of work. The work classifications are:

- Class I:** Removal of thermal system insulation and spray-applied or troweled on surfacing ACM and/or PACM;
- Class II:** Removal of other ACM;
- Class III:** Repair or maintenance operations where ACM is likely to be disturbed (not to exceed one glove-bag or waste bag per operation);
- Class IV:** Maintenance and custodial activities where employees contact ACM or PACM and activities to clean-up waste and debris containing ACM or PACM generated by Class I, II, or III work.

#### **1.4.2.2 *Regulated Areas***

Regulated areas are required to be established at the following locations:

- Areas where Class I, II and III asbestos work is conducted (i.e., where an abatement contractor is working).

- Areas where debris and waste from asbestos work accumulates (i.e., rooms where asbestos is stored).
- Areas within which airborne concentrations of asbestos exceed, or may exceed, the permissible exposure limit (PEL).

Typically, only asbestos that is significantly damaged and friable, with either "moderate" or "high" potential for disturbance would necessitate this action (refer to Section 2.3.2). If such a condition is detected, the Asbestos Coordinator should arrange for removal, repair or clean up as discussed in Section 2.2.2.

Requirements for regulated areas include the following:

- Demarcate in any manner that minimizes the number of persons within the work area and protects persons outside the area from exposure to airborne concentrations of asbestos;
- Specified signs shall be provided and displayed (see Section 1.6);
- Access to regulated areas shall be limited to persons who have received asbestos training appropriate to the work they perform inside the regulated area (i.e., at least Awareness Training, since contact with asbestos will occur).
- All persons entering a regulated area are required to wear respirators;
- Employees may not drink, eat, smoke, chew tobacco or gum, or apply cosmetics; and
- A Competent Person must supervise all asbestos work performed in regulated areas.

#### 1.4.2.3 Competent Person

OSHA regulations require that a “Competent Person” oversee asbestos work. “The competent person must be capable of identifying asbestos hazards in the workplace and selecting the appropriate control strategy for asbestos exposure, and who has the authority to take prompt corrective measures to eliminate them.”

The Competent Person therefore should be able to determine:

- The Class of Work involved in specific situations;
- Whether regulated areas are required;
- The Hazard Ranking for specific materials; and
- Appropriate Response Actions.

Typically, the abatement contractor’s supervisor will act as the Competent Person for Class I, II or III work. Equity personnel may fill the roll of the Competent Person for Class IV work performed in the facility. OSHA mandates that the designated Competent Person overseeing Class III or IV work satisfactorily complete 16 hour O&M Worker training, or equivalent, with annual updates.

### 1.5 WORK THAT COULD DISTURB ASBESTOS CONTAINING MATERIALS

#### 1.5.1 Class I and Class II Asbestos Work

Class I asbestos work includes renovation or demolition activities that involve the removal of ACM thermal system insulation or spray-applied or troweled-on surfacing materials. OSHA defines Class II asbestos work as the removal of all other ACM, which includes, but is not limited to, the removal of asbestos-containing floor tile, sheet vinyl flooring, mastics, roofing materials and ceiling tile. **An Abatement Contractor shall perform this work.**

The Asbestos Coordinator and Competent Person must select an appropriate abatement strategy prior to the performance of Class I and Class II activities. Site specific procedures including appropriate plans and abatement specifications should be developed by a qualified consultant for the abatement activity.

### 1.5.2 Class III Asbestos Work

OSHA defines Class III asbestos work as repair and maintenance operations where any ACM is likely to be disturbed. "Disturbance means activities that disrupt the matrix of ACM or PACM, crumble or pulverize ACM or PACM, or generate visible debris from ACM or PACM. Disturbance includes cutting away small amounts of ACM or PACM." **An Abatement Contractor shall perform this work.** Typical Class III activities are as follows:

- Installation, removal or repair of pipe supports, valves, flanges, or fittings likely to cause the disturbance of ACM insulating coverings;
- Repair of portions of insulated equipment or accidentally damaged insulation likely to cause the disturbance of ACM insulating coverings;
- Coring, drilling, sawing through ACM floor tile/sheet vinyl flooring and mastic (assumed ACM for floor tile installed before 1981);
  - Renovation involving installation of new flooring over existing floor tile likely to cause the disturbance of ACM floor tile/sheet vinyl flooring and mastic (assumed ACM in pre-1981 buildings);
  - Coring, drilling, sawing through wall or ceiling finishes (surfacing materials) in buildings constructed prior to 1981;
  - Coring, drilling, sawing through ACM wall or ceiling finishes (surfacing materials);
- Coring, drilling, sawing through ACM wall or ceiling drywall;
- Coring, drilling, sawing through ACM roofing materials;
- Coring of floor slabs to create penetrations likely to cause the disturbance of ACM fireproofing; and
- Mounting or anchoring fixtures, furnishings or equipment to ACM walls or ceilings likely to cause the disturbance of ACM;

- Renovation which involves attaching hangers to beams and/or decking likely to cause the disturbance of ACM spray-applied fireproofing;
- Installation or renovation of electrical, or telecommunication lines, lighting fixtures, vents, diffusers or alarms, which requires the temporary removal of ceilings where ACM spray-applied fireproofing or damaged thermal system insulation is present above;
- Removing and/or replacing ACM ceiling tiles.

### 1.5.3 Class IV Asbestos Work

OSHA defines Class IV asbestos work as maintenance and custodial activities during which employees contact ACM; and activities to clean-up dust, waste or debris containing ACM or PACM. Building employees must have two-hour "Awareness" Training to do this work. Contract workers must be properly trained and notified by their employers (see Section 2.5.1). Typical Class IV activities include:

- Activities which are likely to cause damage or abrasion to ACM insulating coverings;
- Maintenance of ACM floor tile/sheet vinyl flooring and associated mastic (assumed ACM for materials installed prior to 1981);
- Changing filters utilized in air ventilation systems where significant amounts of friable ACM are present in the facility;
- Housekeeping activities in areas where damaged PACM and/or ACM is present; and
  - Clean-up damaged/fallen ACM wall or ceiling materials.
  - Clean-up of other minor asbestos releases.

#### 1.5.4 Class IV Work Practices

The following preventative measures are required to be implemented to reduce the potential disturbance of asbestos during all Class IV asbestos work. A Regulated Area (area demarcation, controlled access, respirators, etc.) is required to be created only when airborne concentrations of asbestos within the work area exceeds, or may exceed, the PEL. If the following preventative measures are taken, a Regulated Area (and hence a respirator) typically will not be needed:

- Assume dust, waste and debris, in areas where friable thermal system insulation, or surfacing material is present (PACM or known ACM), contains asbestos.
- Use only vacuum cleaners equipped with HEPA filters to collect dust, waste, and debris containing asbestos. HEPA filters and associated collected waste must be handled by a licensed asbestos abatement contractor.
- Do not dry mop or sweep to clean dust, waste and debris containing asbestos. Use wet methods, or wetting agents when cleaning or disturbing asbestos-containing dust, waste or debris.
- promptly clean-up dust, waste and debris contaminated with asbestos and dispose in leak-tight containers.
- Stripping of ACM floors shall be performed using wet methods and low abrasion pads at speeds lower than 300 RPM.
- Burnishing or dry buffing may only be performed over ACM flooring that has a finish sufficient to prevent pads from contacting the flooring.
- Sanding or grinding of asbestos-containing flooring is prohibited.
- Use of compressed air for cleaning dust, waste, and debris containing asbestos is prohibited.

Persons performing Class IV work are required to have annual two-hour "Awareness" Training. Any work that goes beyond Class IV work is to be performed only by an abatement contractor.

## 1.6 WARNING SIGNS AND LABELS

The OSHA regulations require that building owners and employers ensure that workers in and contiguous to Regulated Areas comprehend warning signs and labels. The following paragraphs summarize warning sign and label requirements.

### General Warning Signs and Labels

Where feasible, the Asbestos Coordinator (as defined in Section 2.2) shall arrange for labels to be placed on installed PACM and/or ACM. Labels are not required on materials, which are coated in such that they may be considered encapsulated (i.e. painted walls or ceilings and waxed floors). Where it is not feasible to directly label the materials (i.e., flooring or ceilings), informational signs can be placed in nearby areas frequented by persons likely to disturb the subject materials. Additionally, "Non-Asbestos" labels can be placed on infill replacement sections of insulation in locations where asbestos materials are prevalent. The Asbestos Coordinator should cause labels to be positioned with an orientation and frequency to minimize the unknowing disturbance of ACM. Labels shall contain the following text:

DANGER  
CONTAINS ASBESTOS FIBERS  
AVOID CREATING DUST  
CANCER AND LUNG DISEASE HAZARD

The Asbestos Coordinator shall arrange for signs to be affixed or posted at the entries to mechanical areas (inside the entry is acceptable) where PACM and/or ACM is present so that employees will be notified of the material, its location, and the appropriate work practices which, if followed, will minimize disturbance to ACM. The text of the signs shall be:

DANGER  
ASBESTOS  
CANCER AND LUNG DISEASE HAZARD  
AUTHORIZED PERSONNEL ONLY  
(Then list: ACM material, location, appropriate work practices)

### Abatement Warning Signs

The employer shall also attach similar signs at all entries to each regulated area so employees who are likely to be exposed will clearly notice them. Since the Regulated Areas will normally only be created by an Abatement Contractor, they would be responsible for placing these signs. Where the use of respirators and protective clothing is required in the regulated area, the warning signs shall also include the following text:

**RESPIRATORS AND PROTECTIVE CLOTHING ARE REQUIRED IN THIS AREA**

## **1.7 WORKER PROTECTION**

OSHA regulations have established exposure standards for airborne fibers, as measured by Phase Contrast Microscopy (PCM), for all asbestos work in all industries, as follows:

- Permissible Exposure Limit (PEL) of 0.1 fibers per cubic centimeter (f/cc), on an 8 hour time-weighted average (TWA); and,
- Excursion Limit (EL) of 1.0 f/cc, averaged over a sampling period of thirty minutes.

It is not anticipated that these limits will be exceeded in normal operations of commercial buildings.

However, if Class I, II or III asbestos work does occur within the facility or there is a possibility of exceeding these limits, the Competent Person and Environmental Consultant shall oversee an Asbestos Contractor in its engineering and work practice controls, establishment of regulated areas, and protection for exposed employees, to include:

### **1.7.1 Respiratory Protection**

The OSHA asbestos regulations require, as a minimum, that respiratory protection be provided in the following four situations where personnel are subjected to asbestos fiber concentrations that may exceed OSHA established limits. The employer must then establish a respirator program in accordance with the requirements of the American National Standards Institute (ANSI) Practices for Respiratory Protection, ANSI Z88.2-1969. Refer to Appendix E for Program Requirements and

**Respirator Selection Guidelines.** An asbestos abatement contractor should be engaged if it is believed that a work activity will require the use of a respirator. The following identifies when the use of a respirator is required:

1. During the interval necessary to implement work practices (e.g. wet cleaning, intact removal of material. Use of drop cloth) and engineering controls (e.g. exhaust ventilation with HEPA filtered dust collection, general ventilation, HEPA filtered vacuum cleaners, enclosure and isolation practices, etc.).
2. Work operations (e.g. maintenance and repair activities) or other activities for which engineering controls are not feasible.
3. Work situations where feasible engineering controls are not yet sufficient to reduce exposure below the PEL or EL.
4. In emergencies (refer to Section 1.8).

### **1.7.2 Medical Surveillance**

Medical surveillance is not required for general building occupants or persons involved in only Class IV work.

Employers must obtain a respiratory determination for those personnel whose responsibility is to respond to potential emergency situations, or wear respirators only “occasionally”, or perform Class I, II, or III work less than 30 days per year. A physician shall determine whether the individual is able to wear a respirator based upon evaluation of a pulmonary function test of forced expiratory volume at 1 second (FEV 1.0) and forced vital capacity (FVC).

Employers must provide comprehensive examinations for personnel who (for more than 30 days per year) will be required to wear respirators or will be exposed to airborne concentrations of asbestos fibers at or above the PEL or EL, or perform Class I, II, or III work. Refer to Appendix F for the requirements of a full Medical Surveillance Program.

## **1.8 EMERGENCY SITUATIONS**

An emergency situation is an occurrence that would cause an immediate increase in airborne fiber levels (a fiber release) due to disturbance of friable ACM or contamination of the building environment by unprotected ACM. Special procedures are required to properly respond to a fiber release episode. These procedures will vary, depending upon the friability, quantity and location of the asbestos. For example, a minimal response would be required if one asbestos ceiling tile was crumbled in a storage area, whereas, a full containment and cleanup by an abatement contractor could be required if several feet of asbestos pipe insulation delaminated in an air-handling room.

### **1.8.1 Typical Occurrences**

Typical occurrences that might create a fiber release are:

- Fire;
- Water damage from roof leakage, pipe rupture, or other means;
- Construction procedures causing excessive vibrations such as coring, jack hammering, or vibrations from other mechanical constructive devices;
- Improperly planned or executed renovation or remodeling activities; and
- Earthquakes, structural failures or other catastrophic building movements.

A “small” fiber release typically involves up to 3 square or linear feet (per EPA) of friable ACM. A “large” fiber release involves over 3 square or linear feet (per EPA) of friable ACM. Some states have a more restrictive definition. Equity’s Competent Person and Asbestos Coordinator shall determine the extent of the response to fiber release episodes.

### **1.8.2 Immediate Procedures To Be Implemented**

The Competent Person and Asbestos Coordinator shall be notified in case of an emergency situation affecting ACM. An Asbestos Emergency Response Team may be assembled to assist the asbestos coordinator to perform the following procedures when a large fiber release occurs:

- Turn off air handling system in affected area;
  - Evaluate the evacuation of contaminated area of all non-essential occupants;
- Without hampering life-safety activities and within the scope of the Team's authority, ensure that personnel in the potentially contaminated area are aware of the asbestos hazard, and that they are properly protected;
- Isolate affected areas by closing all doors.;
- Immediately notify the Competent Person, Asbestos Coordinator, the designated consultant's representative, and designated building contractor;
- Fill out an Asbestos Episode Report and maintain in the filing system;
- Arrange for the construction of airtight sealed door spaces, window spaces and other openings in the area with plastic sheeting; and
- A qualified consultant in conjunction with the Competent Person and Asbestos Coordinator as required shall develop additional procedures.

### **1.8.3 Secondary Procedures To Be Implemented**

The Asbestos Coordinator should do the following when an emergency situation affecting ACM occurs:

- Secure the affected area of the building;
- Establish written procedures for authorization and access to affected area;
- Keep security team informed of the status of the emergency situation;
- During remediation, provide security in the work area to protect tenant property;

- Arrange for specialty consultants if required; and
- Consider the effect of emergency situation on utilities, HVAC systems, elevators and the building structure.

#### **1.8.4 General Information**

- Fire can significantly disperse asbestos fibers.
- After an incident, treat the environment as contaminated until proven otherwise.
- Collect as much data about the situation as possible, as quickly as possible.
- If contaminated, stairwells and elevators should be decontaminated first.

## **2.0 ASBESTOS MANAGEMENT**

### **2.1 ASBESTOS RESPONSE ACTIONS**

The four commonly accepted approaches to controlling asbestos exposure in buildings are as follows:

- Removal: Asbestos material is removed and properly disposed.
- Encapsulation: Asbestos material is coated with a bonding agent called a sealant or an encapsulant.
- Enclosure: Asbestos material is isolated from the building environment by an airtight barrier.
- Operations and Maintenance Program: No immediate removal action is taken. An Operations and Maintenance (O&M) program is instituted and designed to reduce the risk of generating airborne fibers through disturbance of the materials by those individuals present within the facility.

#### **2.1.1 Removal**

Proper removal is the only final solution to problems created by the presence of ACM in buildings. Removal eliminates the asbestos source and the need for subsequent special operations and maintenance procedures. However, due to physical constraints and location of materials, complete removal of all ACM in a building is sometimes impractical. Removal often requires replacement of the removed materials with non-asbestos containing materials. Removal almost always presents the highest initial cost of the available alternatives, although long term costs of removal may be comparable or less than the alternatives described below.

#### **2.1.2 Encapsulation**

Encapsulation consists of spraying ACM with a sealant to bind asbestos fibers and other components together to reduce the risk of fiber release and increase the materials resistance to damage. The initial cost of encapsulation may be lower than removal, although over the long term, operations and maintenance procedures, periodic reassessment, monitoring of building activities, and even reapplication of sealant due to degradation over a period of time can result in an overall cost exceeding that of removal. With encapsulation, the source of the hazard remains in the building and must be considered when planning renovation, demolition or extensive maintenance activities. In some cases the encapsulant can cause separation of ACM from building surfaces, increasing the potential for fiber release. In addition, encapsulation can make subsequent removal more difficult and hazardous since some of these products create a hard and impermeable surface, which cannot easily be wetted to facilitate removal.

#### **2.1.3 Enclosure**

Enclosure involves the construction of an airtight barrier around the ACM. Carefully constructed airtight enclosures can reduce and even eliminate release of airborne fibers into the building environment. Enclosure is impractical in certain instances, particularly where the existence of or need for access to other building components in close proximity to the ACM exists. This alternative does not require replacement of the ACM and usually exhibits a lower initial cost than removal. However, since the ACM remain in the building, special procedures are required for controlling access to the enclosure, maintenance activities, and renovations in the area which can make the long-term costs comparable or even higher than removal.

#### **2.1.4 Operations and Maintenance Program**

When the existing ACM in a building is in good condition, the implementation of an O&M Program is acceptable industry-wide as an interim provision prior to removal.

The function of an O&M program is to effectively reduce the potential for disturbance of ACM, describe adequate respiratory protection to personnel working in the vicinity of ACM, and

initiate a record keeping system to document the use and function of this program within the facility. Use of this program should continue as long as ACM remain present in the facility.

In some cases, based on the condition of the ACM and the exposure assessment, removal, encapsulation or enclosure may be deferred and other positive control measures undertaken. Whenever ACM is known to exist in a building, O&M procedures should be established to maintain an acceptable level of airborne fibers and limit exposure to them.

Periodic inspection to monitor changes in the exposure potential of the materials is an integral part of this program. Removal/replacement of damaged ACM, and clean-up are performed per the requirements of the O&M program.

Persons who may come in contact with ACM, particularly management employees, and maintenance or housekeeping personnel, must be informed of the presence of the hazardous materials, and cautioned against damaging or disturbing them. Disturbance of the areas where fibers may collect should be avoided unless proper precautions and personnel protection are provided. Remodeling and renovation plans should be carefully reviewed with respect to the disturbance of the ACM.

An O&M Program should follow the guidelines outlined in the United States Environmental Protection Agency (EPA) document entitled *"A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials,"* (EPA 20T-2003, July, 1990) also known as the "Green Book".

To be effective, an O&M Program requires thoughtful input and participation by the building owner and manager. A good O&M Program is proactive in nature, and requires ongoing commitment.

## 2.2 ASBESTOS COORDINATOR

An Asbestos Coordinator should be assigned to implement, or arrange for the implementation of, the procedures of an O&M Program. The duties can be grouped into the following general categories:

### **2.2.1 Program Administration**

- Schedule required training;
- Establish a location within the facility, and a system for retaining the records specified herein (refer to Appendix G); and
- Inform employees and contractors about the existence and requirements of an O&M Program. Refer to Section 2.5.1 for specific notification requirements.

### **2.2.2 Coordinating Renovation/Construction Activity**

- Coordinate work between asbestos abatement contractor(s) and non-abatement contractor(s). Refer to section 2.9 for a discussion of the issues, decisions and typical sequence for managing renovation/improvement projects.
- The Asbestos Coordinator should be aware that certain ACM is still in use commercially. MACTEC recommends that contractors provide written confirmation that materials newly installed in the facility do not contain asbestos.
- Well in advance of any Renovation/Improvement/Construction activity, review the available asbestos survey and previous abatement project reports. Additionally, visually assess the planned affected area. Conclude that all potentially affected materials which could be ACM have been rebutted as “non ACM”, or arrange for a qualified consultant to perform a survey of the area as outlined in Section 2.3.1.
- Review and approve all planned maintenance, renovation or installation activities that may contact or disturb ACM. Complete a request for Work Control/Permit (Appendix H) before any such work in the facility begins. The Asbestos Coordinator should review the completed form and the applicable work practices with the affected workers.

### **2.2.3 Routine Maintenance**

- Receive Awareness Training as described in Section 2.4.
- Be aware of all housekeeping, building engineering and tenant activities that are likely to affect asbestos. A Work Activity Log should be kept for these activities.
- Ensure routine maintenance and related activities comply with recommended procedures as outlined in Section 2.8.

### **2.2.4 Ongoing Assessment**

- Evaluate areas that may require special cleaning;
- Schedule and coordinate periodic (semi-annual) surveillance of ACM condition;
- Arrange for appropriate air monitoring before, during and after abatement/renovation activities (see Section 2.7 for detailed air monitoring requirements); and
- Determine the need for, and monitor the condition of, warning labels and signs.

## **2.3 SURVEYS AND SURVEILLANCE**

### **2.3.1 Pre-Demolition or Pre-Renovation Survey**

A survey is not required until suspect materials are planned to be disturbed by renovation (including maintenance activities) or demolition activities. The objective of a survey conducted prior to demolition or renovation activities is to reduce the quantity and types of materials that are required to be treated as ACM because those materials are PACM or assumed ACM. MACTEC cautions that surveys not conducted to current OSHA regulations will likely be insufficient to properly rebut materials as PACM.

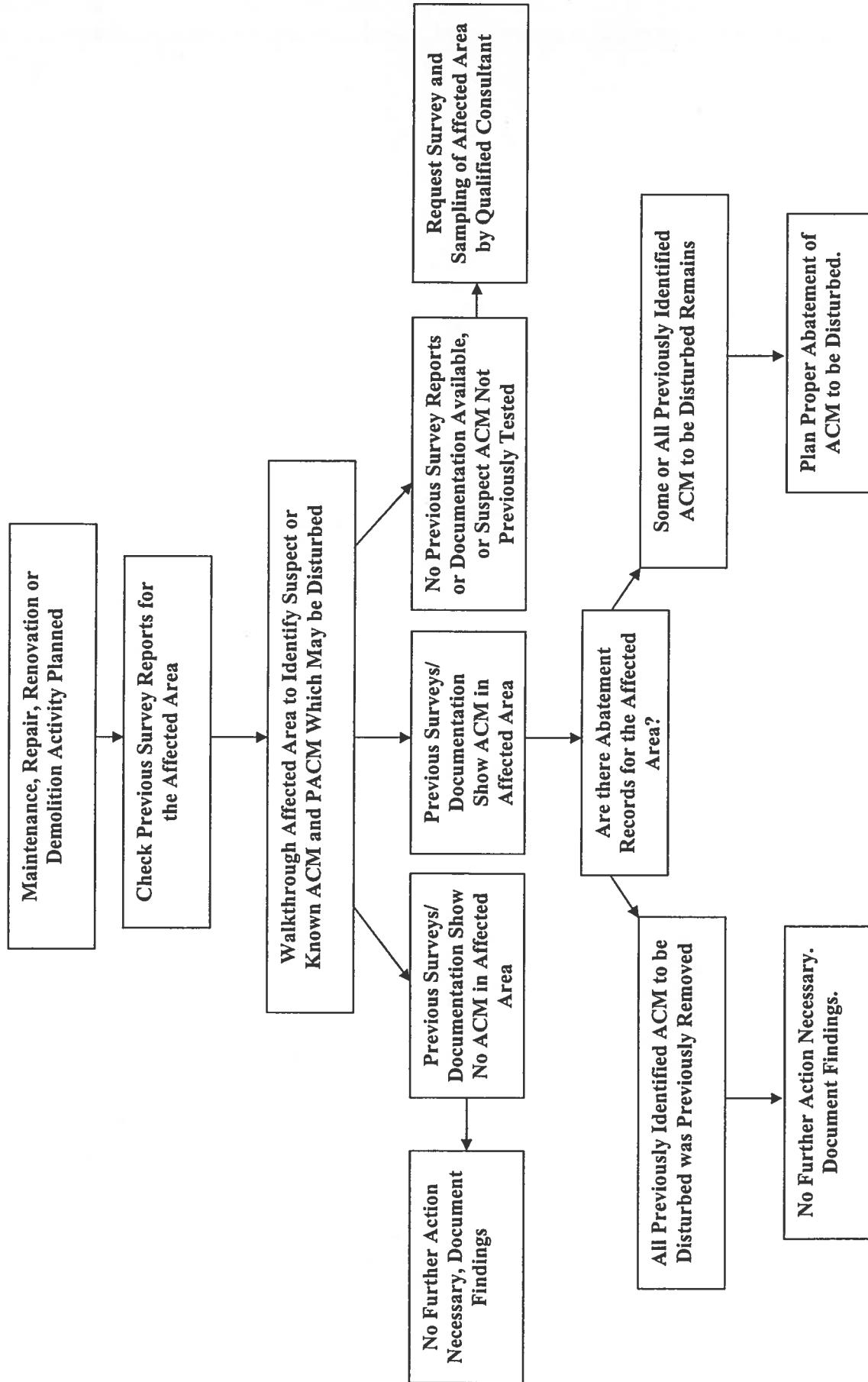
A survey conducted to AHERA standards by a qualified inspector is now required. The standard requires that multiple “negative” samples of TSI or surfacing materials from the same homogeneous area are required to rebut a material as PACM. It should be noted that one positive result is enough to require that a homogeneous material be designated as ACM.

A building survey with bulk sampling is necessary to properly identify and locate asbestos containing materials. Polarized Light Microscopy (PLM) coupled with dispersion staining is the EPA-recommended method of bulk sample analysis.. In the absence of such a survey, the building owner is required to treat all PACM (for pre-1981 buildings) as asbestos. Do not proceed with renovation or demolition activities until impacted suspect ACM has been sampled and analysis results evaluated.

For buildings built after 1980, OSHA only requires that an employer exercise “due diligence” and “inquire into the possibility that a building material is asbestos-containing. The required extent of the inquiry may vary, depending on the prevalence of the ACM for that use in that location, previous surveys, inspections, and other knowledgeable sources, and the date the material was installed.”

EPA NESHAP regulations require a “thorough inspection” for asbestos prior to any demolition or renovation (including routine maintenance) activity which may impact assumed, presumed, or suspected ACM. Sampling is not specifically mentioned. EPA does not specify the qualifications of persons making this inspection; however, in a clarification memorandum they have referenced the EPA Model Accreditation Plan requirement that an accredited asbestos inspector perform the inspection, although this is only a recommendation and not part of the rule. OSHA and most states require that only a certified asbestos inspector can determine the presence or absence of asbestos in buildings.

Prior to remodeling or renovation, Equity’s Competent Person and Asbestos Coordinator will make the initial determination regarding the need for a survey of the affected space(s). The following procedures should be used in making this determination:



Step 1 – Record Review:

- Review existing documentation (e.g. due diligence records from when the property was acquired or existing O&M surveys, See Section 3.0) to evaluate whether a survey in compliance with current OSHA standards is on file.
- If survey documentation indicates ACM is present in the space, review abatement records to determine whether identified suspect ACM has been removed as the result of abatement.
- There are usually certification documents on file from building or renovation contracts, specifications, and drawings from contractors or designers who previously built out a space that all existing materials are “non-asbestos”. Care should be taken to evaluate the qualifications of the persons preparing the certification and the basis for their knowledge of whether ACM was used. Many roofing, coating, and sealant products still contain asbestos and could be used in a tenant build-out, re-roofing, repair or maintenance activity.

Step 2 – Walkthrough

- Once the existing documentation has been reviewed, a walkthrough of the renovation or demolition area should be conducted to confirm that all suspect ACMs have been addressed. As a minimum, the walkthrough should be conducted by on-site personnel with experience in construction means and methods and who have completed the Asbestos Awareness course.

Step 3 – Determine if a Survey is Required

- If limited or no survey documentation exists for the areas to undergo demolition, renovation, repair, or maintenance work, an additional survey may be required. Key items to consider include the construction or renovation date(s) for the space.
  - The use of friable TSI and surfacing was banned by 1981 in the U.S., and so these materials would not be considered suspect ACM in space constructed after this date.
  - By the mid 1980s many, but not all of U.S. flooring manufacturers discontinued the use of asbestos in their products. However, the use of asbestos in these products has not been banned, and ACM flooring was imported at least as late as 1989. Flooring installed after 1990 would have a low probability of containing asbestos
- Evaluate the type, location, quantity, and extent of materials to be disturbed.
  - If only one area or type of material will be impacted by the demolition, renovation, repair or maintenance activity, and a survey is deemed necessary only limited bulk or a limited survey will be required.
  - If the demolition, renovation, repair or maintenance activities are extensive, impact numerous suspect materials, and will occur in large areas of the facility, then a more extensive survey should be performed.
- Evaluate the state and local regulatory, permit and notification requirements.
  - Many state and local jurisdiction have been granted enforcement authority for the EPA NESHAP rule. The majority of these jurisdictions enforce requirements similar to the EPA NESHAP regulation.

- However, some state and local regulatory agencies enforce more stringent requirements which may include requiring a survey of all buildings regardless of age, not allowing the use of building records (i.e. contractor “asbestos-free” certifications), and requiring specific survey protocols (i.e. AHERA compliant sampling procedures). Refer to Appendix Q for a summary of State Specific requirements.

See Section 2.9 for “Typical Procedures for Renovation/Improvement Work”.

### 2.3.2 Asbestos Condition Assessment

There are various recognized schemes for the condition and potential for disturbance of ACM and prioritizing response actions. The most common are the procedures described in the “Asbestos Hazard Emergency Response Act” (AHERA), promulgated by the EPA for use in schools. The Classifications for Material Conditions and their Potential for Disturbance is defined below:

#### 2.3.2.1 *Surfacing Materials*

##### Poor condition (significantly damaged) as defined in AHERA

- Material with one or more of the following characteristics:
- The surface is crumbling or blistered over at least one tenth of the surface if the damage is evenly distributed (one quarter if the damage is localized).
- One tenth (one quarter, if localized) of material hanging from the surface, deteriorated, or showing adhesive failure.
- Water stains, gouges, or marks over at least one tenth of the surface if the damage is evenly distributed (one quarter if the damage is localized).
- Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the material can be used as confirmatory evidence.

##### Fair Condition (Damaged)

- Material with the following characteristics:
- The surface is crumbling, blistered, water-stained, gouged, marred or otherwise abraded over less than one tenth of the surface if the damage is evenly distributed (one quarter if the damage is localized).
- Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the material can be used as confirmatory evidence.

Good Condition

- Material with no visible damage or deterioration, or showing only very limited damage or deterioration.

**2.3.2.2 Thermal System Insulation**

Poor Condition (Significantly Damaged) as defined in AHERA:

- Material with one or more of the following characteristics:
- Missing jackets on at least one tenth of the piping or equipment. Crushed or heavily gouged or punctured insulation on at least one tenth of pipe runs, risers, boilers, tank, duct, etc., if the damage is evenly distributed (one quarter if the damage is localized).
- Accumulation of powder, dust, or debris similar in appearance to the suspect material on surfaces beneath the pipe, boiler, tank, duct, etc., can be used as confirmatory evidence.

Fair Condition (Damaged) as defined in AHERA:

- Material with one or more of the following characteristics:
- A few water stains or less than one tenth of insulation with missing jackets.
- Crushed insulation or water stains, gouges, punctures, or mars on up to one tenth of the insulation if the damage is evenly distributed (or up to one quarter if the damage is localized).

Good Condition

- Material with no visible damage or deterioration, or showing only very limited damage or deterioration.

**2.3.2.3 Potential for Disturbance Factors**

Potential for Contact with the Material

HIGH Service workers work in the vicinity of the material more than once per week,

or

The material is in a public area such as a hallway, corridor, auditorium and accessible to building occupants.

MODERATE Service workers work in the vicinity of the material once per month to once per week.

LOW Service workers work in the vicinity of the material less than once per month,

or

The material is visible but not within reach of occupants.

#### Influence of Vibration

HIGH	Loud motors or engines present (e.g., some fan rooms), <u>or</u> intrusive noises or easily sensed vibrations (e.g., major airports, and a major highway).
MODERATE	Motors or engines present but not obtrusive (e.g., ducts vibrating but no fan in the area), or Occasional loud sounds such as a music room.
LOW	None of the above.

#### Potential for Air Erosion

HIGH	High Velocity air (e.g., elevator shaft, fan room).
MODERATE	Noticeable movement of air (e.g., airshaft, ventilator air stream).
LOW	None of the above.

### 2.3.3 Periodic Building Surveillance

In order to detect deterioration or disturbance that may lead to fiber release, surveillance of ACM by knowledgeable personnel is recommended. Recommended procedures to be included in an O&M program for detection of deterioration are as follows:

- In facilities where ACM spray applied fireproofing is present, and when recommended by site-specific O&M policies, conduct semi-annual or annual prevalent level air monitoring;
- Visually assess exposed ACM on a regular basis for water damage, maintenance damage or deterioration, utilizing the condition assessment and potential for disturbance factors explained in Section 2.3.2; and
- Based on the condition assessment, use the table below to select a Response Action. Note that over time, the condition of the material can change and that materials in good condition, but with a high potential for disturbance may warrant more extensive response actions to

prevent future fiber release episodes. After determining the material condition and potential for disturbance, assign a Response Action as follows:

Condition	Response
Poor/Significantly Damaged	Isolate area and restrict access. Remove or enclose the material as soon as possible.
Fair/Damaged	Include material in an O&M program. Repair or remove material as soon as practical and cost effective, or eliminate material's potential for disturbance.
Good/Un-Damaged	Include material in an O&M program. Continue O&M until major renovation or demolition would disturb the material, thereby requiring removal under NESHAP.

## 2.4 TRAINING OF BUILDING STAFF

An annual two hour (minimum) Awareness Training Session must be conducted for all management, maintenance and housekeeping employees reasonably expected to contact ACM as part of their work, or who may perform Class IV asbestos work. A record of each person attending should be kept along with a certificate signed by the employee that he or she understood the material presented (see Appendix M).

A training program to meet General Industry Standards for housekeeping or maintenance employees who work in areas where asbestos is present should include:

- The health risks associated with asbestos exposure;
- The relationship between smoking and asbestos exposure;
- Recognition of ACM in the Facility;
- Asbestos condition assessment;
- Basic understanding of current EPA, OSHA and local regulations;
- Appropriate custodial and housekeeping work procedures;
- Emergency Procedures

Employees involved in Construction Industry Class IV asbestos work shall also be trained in:

- Discussion of work that could disturb asbestos;

- Understanding warning signs and labels;

Persons who perform Class III asbestos work must attend a State-Agency accredited course equivalent in curriculum and training to the 16-hour course developed by the EPA for maintenance and custodial workers who conduct activities that will result in the disturbance of ACM. The 16-hour “O&M” course must include hands-on training in the use of respiratory protection and work practices. Equity employees will not generally receive this level of training, and therefore are not qualified to disturb ACM.

Requirements for Competent Person training vary by the work that the competent person directly supervises. For Class I and II asbestos work, the Competent Person must be trained as a “Supervisor”, or equivalent. Normally, an abatement contractor would provide this competent person. For Class III and IV asbestos work, the Competent Person must be trained in the 16-hour O&M course.

## 2.5 NOTIFICATIONS

### 2.5.1 Building Occupants and Contractors

The OSHA General Industry Standards requires owners to exercise “Due diligence” to notify employers and employees of the presence and location of ACM/PACM in order to prevent the unintentional and improper disturbance of ACM/PACM. The extent to which Equity will notify will be affected by:

- Restrictions on tenant activities through leases or published building policies;
- Reasonableness of contact with friable ACM;
- Age of construction within the affected space; and,
- The type of ACM present in the space (including above ceiling areas).

The Asbestos Coordinator should inform affected outside contractors who enter the facility, of the presence and location of ACM in the areas where they will work, and emphasize the need for these firms to comply with the facility’s O&M procedures. A signed copy of the **Contractor Asbestos Notice (Appendix K)** should be received from each affected authorized representative. All contract documents provided to the contractor should include a copy for Appendix K for their signature. This only needs to be done once. Should we clarify?

The Asbestos Coordinator should inform employers of housekeeping employees of the presence and location of ACM present in the work areas of their employees. A signed copy of the **Housekeeping Employer Asbestos Notice** (Appendix L) should be received from the employer.

Before work subject to the OSHA Construction Industry Standard occurs (including Class IV work), the building owner shall identify the presence, location and quantity of ACM in the affected worksite, and shall notify the following:

- Bidding contractors (including short-term utility, communications, electrical or mechanical installers) whose employees reasonably can be expected to work in areas containing ACM:
  - A signed copy of the **Contractor** Asbestos Notice (Appendix K) should be received from each affected authorized representative.
- Employers of employees who will perform work in areas containing ACM to the extent that they are likely to contact ACM:
  - This notification also should extend to short-term workers (i.e. trades people in the building to perform specific tasks). Any such individuals likely to disturb ACM should sign a **Contractor** Asbestos Notice (Appendix K).
- Certain facility manager/owner's employees (i.e., management, housekeeping, engineering, security, etc.) who will work in areas containing ACM:
  - Personnel who are reasonably likely to contact ACM during the course of their normal work duties should be advised of potential asbestos hazards and asked to sign an **Employee** Asbestos Notice (Appendix M).
  - Provide a copy of "Guide for Minimizing Exposure to Asbestos-Containing Materials" (Appendix N) to all custodial/maintenance employees reasonably likely to disturb ACM.

## 2.5.2 Government Agencies

The EPA and (typically) state level environmental and/or worker protection agencies require notification of most demolition/renovation activities involving asbestos. Notification is typically required to be sent on a specific form to the relevant government agencies.

#### **2.5.3 Signs and Labels**

OSHA requires that installed ACM and PACM be labeled in routine maintenance areas such as mechanical rooms or areas above ceilings where air conditioning filters are changed. Such labels are not required in tenant areas, lobbies or other public areas. The labels must meet the requirements of the OSHA asbestos rule and be displayed in such a manner as to allow an employee to avoid a potential asbestos hazard by identifying the presence of asbestos (See Section 1.6).

As an alternative to labels, a building or facility owner or manager may install signs, so long as the signs include all of the information on a label and allow the affected employees to avoid the hazard. One example so the use of signs in lieu of labels would be to post a sign in the closet where the equipment and supplies are kept for stripping, waxing and buffing ACM vinyl floor tile. Since the employees would see the sign each time they initiated this housekeeping activity it would be equivalent to a label on the ACM.

It should be noted that some state and local regulations are more stringent than federal OSHA regulations regarding signs and labels (see Appendix Q). On site personnel should confirm the appropriate signs and labels with their "Asbestos Coordinator", local Environmental Consultant, or Director of Engineering prior to installation.

#### **2.6 RECORD KEEPING**

MACTEC recommends that special files be established and maintained for permanent records. Additional publication or microfilming for security or safety is also recommended. Pursuant to 29 CFR Section 1910.1001 (General Industry Standard), all employee exposure records and medical records pertaining to employees exposed to toxic substances or harmful physical agents must be preserved and maintained by the employer for 30 years.

Whenever an employee or his designated representative requests access to a record, the employer must assure that such access is provided in a reasonable time, place and manner. This provision, however, does not require the employer to post such records. However, specific OSHA asbestos regulations have

been interpreted to require that within 15 working days after the receipt of the results of any monitoring performed under the standard, that the employer notify the affected employees of the results in writing either individually or by posting the results in an appropriate location accessible to affected employees.

A list of separate file folders recommended to be maintained is given in Appendix G. The following records should be maintained:

#### **2.6.1 Survey and Surveillance Reports**

A copy of all survey reports performed for the facility documenting the location and condition of ACM must be maintained as long as relied upon, and shall be transferred to subsequent owners. This file should include reports of reinspection performed to monitor subsequent conditions of affected materials.

#### **2.6.2 Training Records**

The following training records must be maintained for a period of one year beyond the last date of employment (MACTEC recommends a 30-year retention):

- A list of attendees at each training program
- The nature of each training program
- The signed acknowledgement of training form
- Copies of the certificates who complete EPA-accredited training

#### **2.6.3 Copies of Notifications**

- Tenant Asbestos Notice
- Contractor Asbestos Notice
- Housekeeping Employer Asbestos Notice
- Employee Asbestos Notice
- O&M Worker's Acknowledgment

#### **2.6.4 Medical Records**

Medical records for any of the building owner's employees required to wear respirators must be retained for a period of at least 30 years. A copy of each employee's medical record should be placed in the employee's personnel file. Records to be maintained should include:

- All Examination records
- All Physician's Written Opinions
- All Annual Fit Test records

#### **2.6.5 Air Monitoring Reports**

Reports indicating the following should be maintained for future reference:

- Prevalent level (semi-annual assessments) of airborne fiber concentrations
- Documentation of Negative Exposure Assessments
- Any employee personal air sampling results
- Airborne fiber concentrations collected for abatement activities
- Airborne fiber concentrations during or following emergency investigations

In addition, 29 CFR Section 1926.1101 (OSHA Construction Industry Asbestos Standard) requires that an employer notify affected employees of the monitoring results that represent that employee's exposure as soon as possible following receipt either in writing individually or by posting at a central location that is accessible to affected employees.

### **2.6.6 Floor Plans**

MACTEC recommends creation of floor plans that include, as a minimum, the following information:

- Locations of known ACM
- Clear identification of removed ACM and replacement material location
- Date of each abatement activity and contractor's name

These plans should be updated as required.

### **2.6.7 Work Control/Permits**

- A work activity log should be updated each time ACM is disturbed, or whenever personnel don respirators as a precaution against potential fiber release from their activities.
- Work Control/Permit forms and associated documents should be maintained chronologically and kept in the property's O&M file.

### **2.6.8 Asbestos Project Documentation**

Contracts documents for each asbestos project should require the following and copies should be retained. The information should include:

- All EPA, State or Local NESHAP "Notification of Demolition or Renovation" forms
- Exact locations of the worksites within the building
- Type and scope of asbestos work conducted
- All ACM left within the worksite boundaries
- Type of replacement material used (if applicable)
- Dates of Work
- Abatement Contractor's Name (s) and address(es)
- Contractor's insurance Certificate
- Landfill Receipts and EPA NESHAP Asbestos Waste Shipment Records
- Tabulation of all Air Sample Results
- "In/Out" Log to document each person who entered the regulated area

- For Each Abatement Worker:
  - Name
  - Copy of current training certificate and license (if applicable)
  - Current Physician's Written Opinion
  - Current Fit Test Record

Copies of these records are to be maintained in the property's O&M File. A copy of the Consultant's post abatement report should be provided to at Equity Office Properties' Corporate Office, care of the Vice President of Corporate Engineering.

## 2.7 AIR MONITORING

Air sample analysis can be performed by either Transmission Electron Microscopy (TEM), in accordance with AHERA protocols, or by Phase Contrast Microscopy (PCM), in accordance with the National Institute of Occupational Safety and Health (NIOSH) Method 7400. TEM analysis has several advantages over PCM analysis:

- The PCM method counts any fibers detected within a specified dimensional range, and cannot distinguish asbestos fibers from non-asbestos fibers, while the TEM method positively identifies asbestos;
- TEM analysis of air samples is mandated under AHERA for clearance sampling of asbestos abatement projects in primary and secondary schools. As such, it is considered the best recognized method of air sample analysis (industry state of the art);
- During minor O&M activities, and ambient air monitoring, the many types of non-asbestos fibers present within the facility (from linens, carpet, clothing, paper goods, etc.) can produce elevated fiber counts. These non-asbestos fibers cannot be excluded from counting under PCM analysis. It is not possible to determine actual asbestos fiber levels when reviewing PCM-derived fiber counts; and

Air monitoring is not mandated, except associated with most asbestos abatement projects. The various categories of air monitoring and the purpose of each, are:

### **2.7.1 Prevalent Level Airborne Fiber Concentration**

As part of a site-specific O&M Program, air monitoring can be performed in the facility during periodic re-inspections to document prevalent (ambient) airborne fiber concentrations. To exclude any non-asbestos fibers from contributing to fiber level concentrations, TEM must be used to analyze the air samples. These tests form the base line data and shall be one of the deciding factors from which future decisions shall be made in dealing with the ACM. Background air samples should also be taken prior to tenant improvement or abatement operations to document existing fiber concentrations.

### **2.7.2 Negative Exposure Assessment**

A “Competent Person” makes a Negative Exposure Assessment (NEA) (see Section 1.4.2.3). An NEA utilizes an evaluation of air monitoring data, work practices, and engineering controls to determine “with a high degree of certainty” that a specific activity will not generate airborne asbestos fiber concentrations above OSHA exposure limits.

Based on industry practices, it is typical that activities found to generate airborne asbestos fiber concentrations above prevalent (background) levels would prevent an NEA from being made.

**The following guidelines must be followed in making an NEA:**

- Sampling must be performed on the same individuals, or individuals who have the same level of OSHA-specified training as those individuals who will perform the work being assessed.
- Sampling can be done during the initial phase of a project to conclude that an NEA can be made for that project.

- Data from a recent previous project (within the last 12 months) that “closely resembles” a proposed job can be used to make an NEA for a proposed project. However, all of the following must be similar:
  - Level of worker training;
  - Type of material being disturbed;
  - Work practices; and,
  - Engineering controls (i.e work area isolation procedures)
- An NEA cannot be made when untrained workers will be involved.

**Unless an NEA is made, activities that may disturb ACM are to be treated as asbestos O&M or abatement work.**

#### **2.7.3 Air Monitoring During Minor Asbestos Work**

Personal air monitoring is recommended to be performed during minor asbestos activities (see Section 2.8) in areas where asbestos surfacing material or TSI is present. Repeat sampling annually thereafter to obtain exposure levels that can be expected during similar activities. Generally this sampling will document whether respirators and regulated areas are required.

Minor asbestos activities should be monitored periodically by a qualified consultant to determine typical airborne fiber levels that may be generated. Monitoring should include both area and personal sampling as defined below. Any activities that are likely to generate fiber counts greater than the PEL or EL should only be performed as an abatement activity.

#### **2.7.4 Air Monitoring During Asbestos Abatement Work**

Air monitoring should be performed during all abatement activities to document airborne fiber concentrations both inside and outside the regulated work area. OSHA requires that daily perimeter air monitoring be performed adjacent to regulated areas in occupied buildings. Specific project requirements should be addressed and performed by a qualified consultant. Air monitoring should be performed to obtain both environmental and personal samples.

### Environmental (Area) Air Monitoring

Asbestos fibers which are too small to be seen by the human eye are potentially the most dangerous to one's health. Insight can be gained, however, by collecting air samples and analyzing them by Phase Contrast Microscopy (PCM). Area air monitoring gives an indication as to how well airborne asbestos fibers are being contained inside the work areas. Samples should be taken prior to and during the full period of the actual removal operation.

Air samples should be taken immediately outside of the work area for the purpose of detecting leakage of asbestos fibers from the work area. This is especially important in situations where people who are not protected are present in immediately adjacent areas. Areas around entrances and exits to the work area should be tested. If diminished pressure methods are used, it is recommended to monitor the air being exhausted from the work area.

Area air samples taken within the work area serve to give an indication of the effectiveness of the contractor's work procedures. It should be noted that area air samples cannot be substituted for personal samples to satisfy the OSHA requirements concerning personal sampling to determine actual worker exposure levels. Only personal air monitoring indicates worker's fiber exposure levels, which in turn indicate the type of respirator that should be worn by the employee. Both types should be taken during any major asbestos activity.

The actual number of samples and air volumes required at each work area will be different and even change from day-to-day depending on the work activity. Remember that the most important area samples are those taken outside the work area. It is the data from these samples that provides the record of whether the asbestos fibers are being confined to the work area or not. Also, maintaining low fiber concentrations during the removal will make the clean-up procedures easier at the end of the job.

As with the personal sampling records, the results of all area sampling should be maintained along with other documentation (landfill receipts, medical records, etc.) from each job.

### Personal Air Monitoring

Personal air monitoring is the method used to document a maintenance employee's or abatement worker's exposure to airborne asbestos fibers. During asbestos removal projects, the abatement contractor is responsible for personal monitoring of his workers.

Personal air samples, (which must include both PEL and EL sampling) are used to indicate whether exposure levels exceed, or do not exceed, those which correspond to the type of respiratory protection being used. The higher the concentration of asbestos fibers detected, the greater the degree of protection that is needed from a respirator. Under the current OSHA asbestos standard, employees have the right to review the results of their personal monitoring and to be informed of measures being taken to protect them. The Asbestos Coordinator is to maintain personal air sampling records which may occasionally be generated during typical or test O&M activities by employees of the facility.

If properly used, the personal sampling data can indicate what methods of removal and control result in the lowest employee exposure. Air sampling results from past projects should be kept on file.

### Final Clearance Air Monitoring

Following abatement or other major activities during which ACM are disturbed, air monitoring should be performed to document airborne fiber concentrations after final cleaning. This will serve to assess the effectiveness of abatement operations and compliance with pre-specified clearance airborne fiber levels.

Unless more stringently specified in state or local regulations the following clearance levels should be utilized, as a minimum:

ACM Quantity per Work Area	PCM	TEM
Less than 160 SF or 260 LF of friable ACM	All samples less than or equal to 0.01 fiber f/cc	N/A
Greater than 160 SF or 260 LF of friable ACM	N/A	All samples less than, or equal to 0.01 str/cc

**PCM – Phase Contrast Microscopy**  
**TEM – Transmission Electron Microscopy**  
**SF – Square Feet**  
**LF – Linear Feet**  
**f – fibers**  
**str – asbestos structures**  
**cc – cubic centimeter of air**

**Note: PCM may be used for clearance on projects where only non-friable ACM (such as floor tile) is removed and the ACM remains non-friable during removal, even if the quantity exceeds 160 SF or 260 LF.**

## **2.8 TYPICAL PROCEDURES FOR MINOR ASBESTOS WORK**

For the purposes of this Manual, minor asbestos work is defined as Class III work, which is limited to disturbance of ACM where the debris can all be placed into one standard (60"x60") waste bag. Disturbance of ACM in quantities greater than this should only be undertaken as Class I or II work. OSHA Regulations allow persons who are trained as O&M workers, and who participate in a Respiratory Protection and a Medical Surveillance Program, to perform minor asbestos activities. We understand that it will generally be Equity's policy that an abatement contractor be retained for this work.

Contact the Asbestos Coordinator to prepare a general description of the maintenance activity to be performed, along with the size and location of the project area. Determine that the work is not Class I or II work.

Vacate the room or areas in which the maintenance activity is to occur. Shut off the air handling system or otherwise isolate the work site to minimize the distribution of any released fibers. Arrange for a contractor to do the work as soon as practical. Review the Contractor's work procedures prior to initiating the project.

Generally, the contractor should:

- Post caution signs meeting the specifications of OSHA 29 CFR 1926.1101 at all entrances to the work area.
- Pre-clean any items that are to be moved from the work area using High Efficiency Particulate Air (HEPA)-vacuum equipment and, where feasible, wet cleaning methods.

- Pre-clean and isolate (with plastic sheeting) fixed objects that will remain within the proposed work area.
- Use polyethylene critical barriers, mini-enclosures, or glove bags to isolate the removal activity from the rest of the facility.
- Place a 6-mil polyethylene plastic drop sheet beneath the location of the maintenance work, extending at least 10 feet beyond all sides of the work site.
- Unless an NEA has been made, ensure workers wear protective clothing and respirators.
- Create Local Exhaust Ventilation (LEV) by continuously operating a HEPA vacuum air intake in the vicinity of the activity to draw airborne fibers into the vacuum. Direct the vacuum exhaust away from the work location so that it does not create airflows that contribute to airborne fiber dispersal.
- Use a low-pressure airless sprayer and amended water to thoroughly wet the area of asbestos-containing materials to be disturbed.
- Use a HEPA-vacuum air intake in close proximity to power drills, saws, or other tools that may disturb asbestos materials.
- HEPA-vacuum any debris apparent on the plastic drop sheet, floor or elsewhere.
- Wipe with a damp cloth any surfaces in the project area that may have been contaminated with asbestos-containing materials during the activity.
- Wipe the plastic drop sheet with a damp cloth. Carefully fold the plastic sheet and discard the sheet and cloth as asbestos waste.
- Double-bag, in properly labeled, 6-mil polyethylene bags, any ACM that are removed during the activity and dispose of as asbestos waste.

- Dispose of, in properly labeled 6-mil polyethylene bags, all cloths, vacuum bags/filters and other ACM as asbestos waste.

## 2.9 TYPICAL PROCEDURES FOR RENOVATION/IMPROVEMENT WORK

This section outlines the recommended operating procedures when planning and executing work that involves: disturbing any walls or ceilings, flooring installation or removal, or mechanical system changes.

These projects may or may not affect ACM. It is important that the below-outlined process is followed so that liability is reduced and compliance with regulations occurs without needless expenditure of funds.

### 2.9.1 Determine the Presence and Extent of ACM

- Buildings built after 1980 are “much less likely” to contain ACM, but an investigation into their possible presence must be made.
- Review the proposed construction activity and assess whether any known or suspected ACM will be affected. Refer to Section 1.5.
- Review available asbestos survey reports to determine whether all suspect materials have been sampled and analyzed. If appropriate, perform supplementary sampling per the guidance in section 2.3.1. Remember additional sampling may impact the project’s completion schedule.
- Map the extent of materials determined to be ACM. If any ACM is present continue with the following steps.

### 2.9.2 Examine Options

A qualified consultant in conjunction with the Asbestos Coordinator should evaluate response options. Abatement alternatives generally include:

- Clean dust and debris in the planned construction area

- Clean, repair and/or encapsulate any damaged or friable ACM
- Modify construction plans or details so ACM is not disturbed
  - Clean and enclose the ACM from the construction area

If it is determined that removal of asbestos is required, follow the general procedures in 2.9.5 below. Long term cost consequences should be considered, keeping in mind that NESHAP regulations require removal of all friable or potentially friable ACM from a facility before demolition.

- If ACM will be cleaned up, encapsulated, or enclosed (but not removed), provide the renovation bidders with an asbestos notice per section 2.5.1.
- Based on the complexity of the project, use appropriate bid documents to obtain abatement contractor bids. Note that a combination of response actions may be appropriate.
- Realize that it is advisable to plan two weeks for bidding and two additional weeks before the awarded bidder will be able to start work.

### **2.9.3 Notifications and Permits**

- Compare the project extent with EPA notification requirements given in Appendix B. Also be aware of any additional state and local notification and/or permit requirements. Allow time for the agency approval process.
- Obtain copies of accepted notifications before allowing work to start. Ensure that other employers whose worker's are likely to contact ACM on this worksite have been notified per section 2.5.1, paragraph "2)".

### **2.9.4 Major Asbestos Work**

Major asbestos work requires the implementation of extensive work area isolation and barriers, the use of sufficient respiratory equipment and protective clothing, as well as progress and clearance air monitoring. All major asbestos work must be performed in regulated areas, and a Competent Person must supervise the work. The scope of major abatement projects typically limits this work to unoccupied areas where access is restricted and HVAC and electrical systems are shut down.

Procedures for these activities should be addressed in specifications prepared by a qualified consultant. Solely qualified asbestos abatement contractors should perform all major activities. A qualified consultant retained directly by the owner should perform air sampling before, during, and at the completion of the abatement activities.

The following items are general procedures commonly followed during major various asbestos removal operations. These procedures are not meant to be specifications, but rather as a list for the Asbestos Coordinator to understand typical asbestos-related control activities.

#### Preparation

- Review the contractor's permits and abatement notification.
- If the project is large or complex, retain a consultant to prepare specifications and administer the project.
- Arrange for the isolation of the affected room or area as well as heating, cooling, and ventilating air systems to prevent contamination and fiber dispersal to other areas of the structure.
- Arrange a location within the facility for the abatement contractor to store his materials, and bagged asbestos waste.
- If not contaminated, remove furnishings from work area if feasible. If contaminated, abatement contractor shall first clean or dispose of the furnishings.

- Arrange for the building of solid barriers, or the locking of all entrances to and exits from the work area.

#### During Removal

- Arrange for a consultant to observe the contractor's work for conformance to regulations and site-specific specifications. Request daily status updates.
- Arrange for a consultant to perform air monitoring per section 2.7.4.
- Arrange for a consultant to perform final visual inspection of the cleaning in the work area after the performance of the abatement work to determine whether the area is free of dust, dirt and debris.

#### Clearance

- Arrange for an aggressive air clearance test after the consultant has visually assessed that the work area has been decontaminated. Whether clearance air sample analyses should be done by PCM or TEM should be decided in consultation with the air-sampling consultant
- Arrange for a final walk-through of the work area after the successful performance of the abatement work to assess whether areas are free of dust, dirt and debris. Document any damage to the facility caused by the abatement contractor.

### Asbestos Disposal

- All contaminated material must be removed from the work area in properly marked 6-mil polyethylene bags, or in marked and sealed drums. The facility owner retains title to the waste. Each container must be labeled with the generator's (owner's) name and facility address.
- UNDER NO CONDITIONS, SHOULD ASBESTOS MATERIALS BE DISPOSED OF IN ANY TOXIC WASTE DUMPSITE. In addition, if an on-site dumpster is utilized for storage before disposal, the Asbestos Coordinator should arrange for 24 hour security of said dumpster (i.e., the dumpster may be locked in a secured area with limited access).
  - Obtain documentation of disposal including the Waste Shipment Record form. Copy the form when each load of asbestos is removed from the site. A fully signed form is to be returned to the facility within 35 days, or the owner must notify the EPA, or the state or local NESHAP coordinator.

### Final Project Documentation

- The Contractor is to provide asbestos project documentation, as stated in section 2.6.8. One copy should be kept on-site in the building's O&M Plan files and another copy is to be sent to the Director of Engineering (DOE).

#### **2.9.5 Engaging a Consultant**

When an environmental consultant is required, the asbestos coordinator or the competent person is to call the DOE. The options will be discussed, and if it is determined that a consultant is necessary, a proposal will be solicited from a qualified environmental consultant. The proposal is to be sent to the DOE. For consultants, the Equity Office Properties Consulting Agreement modified for Environmental work only (EO 3008a8) must be used. The proposals or consulting agreements noted herein can only be signed by the DOE, Vice President of Corporate Engineering, or the Senior Vice President of Engineering and Energy Operations.

#### **2.9.6      Contracts for Asbestos Abatement Work**

The Equity Office Properties Construction Agreement, Form EO 3006, is to be used in all asbestos abatement work. These contracts can only be signed by the DOE, Vice President of Corporate Engineering, or the Senior Vice President of Engineering and Energy Operations