



GeoTek, Inc.
1548 North Maple Street, Corona, California 92880
(951) 710-1160 Office (951) 710-1167 Fax www.geotekusa.com

**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

**DGS CALIFORNIA CORRECTIONAL INSTITUTION
24900 HIGHWAY 202
TEHACHAPI, CALIFORNIA**

October 19, 2018

Project No. 1863-CR-ESA

Prepared for:



**FOREFRONT
POWER**

**100 Montgomery Street, Suite 1400
San Francisco, California 94104**

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1.0 EXECUTIVE SUMMARY

GEO TEK, INC. (GEO TEK) has performed a Phase I Environmental Site Assessment (ESA) for the DGS California Correctional Institution (the “Site”), located at 24900 Highway 202 in the City of Tehachapi, Kern County, California. Our services were conducted in substantial conformance with the scope and limitations of the American Society of Testing and Materials (ASTM) E 1527-13, “*Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*”, which is approved to meet the requirements of the federal All Appropriate Inquiries (AAI) standards as set forth in the Code of Federal Regulations, Title 40, Section 312 (40 CFR 312), and GEO TEK Proposal No. PI100817-CR, dated November 2, 2017. Any additions or deletions from our scope of services are discussed in the appropriate sections of this assessment.

A representative of GEO TEK conducted a Site reconnaissance on September 25, 2018. The weather was warm with clear skies. The irregular shaped Site is comprised of a portion of one parcel of land (the “Parcel”), and encompasses a total of approximately 32 acres. The Site was accessed from the north, via Highway 202. The Site is primarily vacant land covered with volunteer vegetation. Dirt roads cross the Site. An abandoned water pipeline is present in the southern portion of the Site. No hazardous materials or wastes were observed on the Site. No visual indication of spills or leaks was observed. No pungent or acrid odors were observed emanating from the Site. No stressed vegetation was observed.

The Site is located on the campus of the California Correctional Institution. The area the Site occupies is characterized by vacant land to the north, south, and east, and abandoned water basins and the campus fire station to the west.

Based on readily available historic information, the Site appears to have been primarily vacant land since at least 1943. The vicinity has been generally vacant, with the correctional institution present, since 1943. The ponds to the west were present by 1994, and the solar array to the west was present by 2012. No historic recognized environmental conditions were identified.

The Site does not appear on the environmental database report obtained for this assessment. The adjacent Parcel appears on multiple databases. The most impactful is the leaking underground storage tank (LUST) database for a leaking tank reported in 1987. After many years of remediation and monitoring, the LUST case was closed in 2015. The Parcel also appears as a RCRA Generator and a landfill, and on many minor databases. The source areas for these listings is generally 2,000 feet east of the Site. Based on available information, these listings for the Parcel are not considered to represent a recognized environmental condition to

the Site. There are no additional facilities on the database report within the search distances specified by ASTM E 1527-13.

This Phase I Environmental Site Assessment has not revealed evidence of a recognized environmental condition at the subject Site. No additional investigation is recommended at this time.

This executive summary does not contain all the information that is found in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided and to aid in any decisions made or actions taken based on this information.

2.0 INTRODUCTION

GEO TEK, INC. (GEO TEK) has performed a Phase I Environmental Site Assessment (ESA) for the DGS California Correctional Institution (the “Site”), located at 24900 Highway 202 in the City of Tehachapi, Kern County, California.

2.1 PURPOSE

The purpose of this Phase I ESA was to identify and evaluate actual and potential environmental conditions involving the subject Site. It was not the purpose of this assessment to determine the degree or extent of contamination, if any, but rather the potential for contamination.

2.2 SCOPE OF WORK

The Phase I ESA is a general characterization of environmental concerns based on reasonably ascertainable information and observations. GEO TEK performed the Phase I ESA in substantial accordance with ASTM E 1527-13. The following services were provided for the assessment:

- ◆ A reconnaissance of the Site and surrounding properties was conducted to visually assess current utilization and indications of potential surface contamination. This was accomplished by driving the Site boundaries, and then traversing the Site until the entire Site had been surveyed.
- ◆ A reconnaissance of the surrounding area for approximately one-half mile was conducted, without entering the properties, making observations concerning property uses, conditions, and housekeeping.
- ◆ A review of the geologic and hydrogeologic settings was conducted using reasonably ascertainable public records and documents.
- ◆ An environmental database report was obtained from a data service provider. This database report compiles and locates documented “hazardous waste” facilities within specific minimum search distances as defined by ASTM E 1527-13. If necessary, additional information on identified facilities was gathered by a file review at the appropriate federal, state, local, and/or tribal regulatory agency.
- ◆ A review of reasonably ascertainable historical records (including aerial photographs, topographic maps, building records, and city directories) was conducted to assess the

historical land utilization and indications of potential contamination or sources of contamination for the Site.

- ◆ This report was prepared, which relates the findings of this study and presents our conclusions and recommendations.

Specific items not included in this Scope of Services are soil analysis, water analysis, asbestos containing materials analysis, radon analysis, lead-based paint analysis, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, vapor intrusion, high voltage power lines, and other items not within the scope of ASTM E 1527-13.

2.3 SIGNIFICANT ASSUMPTIONS

Specific assumptions by GEOTEK for this assessment include:

- ◆ GEOTEK had permission to access the Site grounds;
- ◆ The client has provided GEOTEK with available geotechnical or environmental reports for the Site;
- ◆ The client has provided GEOTEK with known current or historic uses of hazardous materials at the Site, or with other specialized knowledge of the environmental history of the Site and surrounding area;
- ◆ The client is not the sole and absolute source of information;
- ◆ Seller has provided proper and complete access to their knowledge, both written and verbal, and GEOTEK can rely on the information.

2.4 LIMITATIONS AND EXCEPTIONS

GEOTEK conducted a Phase I Environmental Site Assessment in substantial accordance with ASTM E 1527-13 and as authorized by FOREFRONT POWER. This study does not include sampling of soil, groundwater and/or the debris on-site for environmental testing. This report is intended for the use of FOREFRONT POWER and their immediate assignees. The contents should not be relied upon by any party other than the aforementioned without the express written consent of GEOTEK.

The findings, conclusions, and recommendations made in this report are based on the information that was made available to GEOTEK, in most instances from public records. The information is relevant to the date of our site work and should not be relied on to represent conditions at any later date. The opinions and conclusions expressed herein are based on information obtained during our assessment and on our experience and current standards of technical practice. GEOTEK makes no other warranties, either express or implied, concerning the completeness of the data furnished to us. GEOTEK cannot be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time our assessment was undertaken. GEOTEK is not responsible, nor liable for work, testing or recommendations performed or provided by others. This Phase I Environmental Site Assessment is not and should not be construed as a warranty or guarantee about the presence or absence of environmental hazards or contaminants, which may affect the subject site. Facts, conditions, and acceptable risk factors change with time; accordingly, this report should be viewed within this context.

Specific limitations to the scope of ASTM E 1527-13 due to contract limitations, availability of resources, and/or encountered Site conditions are discussed in the appropriate section(s) of this report.

2.5 SPECIAL TERMS AND CONDITIONS

This assessment report is presented as fulfilling the standard requirements of most financial institutions, governmental regulatory agencies, ASTM, and generally accepted industry standards and practices. Please refer to GEOTEK Proposal No. P1100817-CR for complete terms and conditions for this assessment.

2.6 RELIANCE

This assessment has been prepared for the exclusive use, and may be relied upon by, FOREFRONT POWER and its successors and assignees. Third party reliance letters may be issued upon request and upon the payment of the, then current, fee for such letters. All third parties relying on this report, by such reliance, agree to be bound by the General Conditions and Limitations agreed to FOREFRONT POWER. No reliance by any party is permitted without such agreement, regardless of the content of the reliance letter itself.

3.0 DESCRIPTION OF SITE AND SURROUNDING AREA

The objective of describing the Site and surrounding area is to document current conditions as observed and to obtain information which would indicate the likelihood of a recognized environmental condition in connection with the Site. A representative of GEOTEK conducted a Site reconnaissance on September 25, 2018. The weather was warm with clear skies. The Site was accessed from the north, via Highway 202.

3.1 SITE LOCATION AND LEGAL DESCRIPTION

The Site is located at 24900 Highway 202 in the City of Tehachapi, Kern County, California. According to the U.S. Geological Survey (USGS) Cummings Mountain Quadrangle topographic map (7.5-minute series), the Site is located in the southeast quarter of Section 29, Township 32 South, Range 32 East, Mount Diablo Baseline and Meridian (see Figure 1 in Appendix A). The Kern County Assessor's Parcel Number (APN) is 376-013-02. The Site occupies approximately 32 acres of the parcel, which is considered to be separate from and adjacent to the Site for the purpose of this assessment (the "Parcel"). A copy of the Assessor's Parcel Map is included in Appendix B.

3.2 SITE AND VICINITY GENERAL CHARACTERISTICS

The Site is located on the campus of the California Correctional Institution. The area the Site occupies is characterized by vacant land. (see Figure 2 in Appendix A).

3.3 CURRENT PROPERTY USE

The Site is currently vacant land.

3.4 SITE IMPROVEMENTS

The Site is vacant land transected with dirt roads. An abandoned water pipeline is present along the southern portion of the Site. Photographs of the Site are included in Appendix C.

3.4.1 Hazardous Substances

No hazardous substances or wastes were observed on the Site. No pungent or acrid odors were observed emanating from the Site. No stressed vegetation was observed.

3.4.2 Storage Tanks

GEO TEK did not observe evidence of underground or above-ground storage tanks (such as vent pipes, fill pipes, regular-shaped depressions, etc.) on the Site.

3.4.3 Poly-Chlorinated Biphenyls (PCBs)

GEO TEK did not observe suspect equipment (transformers, elevators, vehicle lifts, trash compactors, etc.), which may contain PCBs on the Site.

3.4.4 Controlled Substances

GEO TEK consulted the U.S. Drug Enforcement Agency (DEA) website to cross-check the Site address against published facilities subject to DEA enforcement. The Parcel did not appear on the list of published facilities. A copy of the DEA printout is included in Appendix B.

GEO TEK did not observe evidence of illegal or controlled substances being used or manufactured at the Site.

3.4.5 Indications of Solid Waste Disposal

Indications of solid waste disposal were not observed on the Site.

3.4.6 Utility Supply

Utility services were observed near the Site. Electricity services for the vicinity are provided by Southern California Edison Company (SCE). Natural gas service is provided by Southern California Gas Company. Water and sewer service for the Site is provided by the Tehachapi Utilities Department.

3.4.7 Drainage

Natural drainage at the Site is generally interpreted to be toward the west, conforming to the natural topography in the area. Stormwater run-off is anticipated to follow the natural pattern. Standing water was not observed on the Site on the date of our reconnaissance.

3.4.8 Other Conditions of Concern

A groundwater monitoring well was identified near the Site (not believed to be on the Site). Mr. Jon Read of CCI has no knowledge of why this monitoring well is present, but speculates it may have been part of the leaking underground storage tank investigation and clean-up conducted at the Parcel, although no record of a well this far east was identified.

No visual indication of dry wells, septic fields, cesspools, or other conditions of concern that would indicate a recognized environmental condition were observed during the site reconnaissance. No stressed vegetation was observed.

3.4.9 Interviews

GEOTEK interviewed the following individuals while performing this assessment:

- Mr. Sean McCartney of FOREFRONT POWER, in the form of a User Questionnaire;
- Mr. Michael Lee of CCI;
- Mr. Jon Read of CCI.

Information from these interviews is incorporated into the appropriate sections of this report. Mr. Read also accompanied GEOTEK during the site reconnaissance.

3.5 CURRENT ADJOINING PROPERTY USE

The Site is located on the campus of the California Correctional Institution. The area the Site occupies is characterized by vacant land to the north, south, and east, and abandoned water basins and the campus fire station to the west.

The adjacent Parcel is not anticipated to represent an environmental concern.

4.0 CLIENT PROVIDED INFORMATION

As a form of interview, Mr. Sean McCartney of FOREFRONT POWER completed a “User Questionnaire” for the Site in accordance with ASTM E 1527-13. A copy of the completed questionnaire is included in Appendix D.

4.1 ENVIRONMENTAL CLEAN UP LIENS

Mr. McCartney is not aware of any environmental clean-up liens at the Site.

4.2 ACTIVITY AND USE LIMITATIONS

Mr. McCartney is not aware of an activity use limitation at the Site.

4.3 SPECIALIZED KNOWLEDGE

Mr. McCartney indicated that he has no specific knowledge of the chemicals and process used at the Site.

4.4 PURCHASE PRICE

This transaction is a ground lease. Mr. McCartney has indicated that this question is not applicable.

4.5 COMMONLY KNOWN INFORMATION

Mr. McCartney indicated he has no knowledge of past uses of the Site. He is not aware of any specific chemicals, chemical spills, or environmental cleanups at the Site.

4.6 OBVIOUS INDICATORS OF CONTAMINATION

Mr. McCartney is not aware of obvious indicators of a likely environmental impact at the Site.

5.0 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION

This section contains other relevant information regarding this assessment in accordance with ASTM.

5.1 INTERVIEWS

GEOTEK interviewed Mr. Jon Read of CCI. Information from this interview is incorporated into the appropriate sections of this report.

5.2 REASON FOR PERFORMING PHASE I ESA

This Phase I ESA was performed by request of FOREFRONT POWER in order to qualify for one of the Landowner Liability Protections offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2002, in the event it should become necessary.

5.3 OTHER USER PROVIDED INFORMATION

GEOTEK was not provided with additional documents regarding the Site.

6.0 PROPERTY PHYSICAL SETTING

Surface and subsurface environments are of interest because they control the movement of water-borne contaminants, which could be transported to and from the subject Site. GEOTEK reviewed information regarding the physical setting of the subject Site and immediately surrounding area.

6.1 REGIONAL GEOLOGY

Tehachapi is located in the Tehachapi Mountains of California. The Tehachapi Mountains are largely the result of the movements of the Garlock Fault, located along the southeastern base of the range, a major transform fault which runs from the San Andreas Fault in the west to the Sierra Nevada Fault on the east and some distance beyond.

6.2 LOCAL GEOLOGIC SETTING AND TOPOGRAPHY

The Site and Site area are part of the Tehachapi Mountains. The underlying rock type is identified as Quaternary age alluvium (CDMG, 1964). The surface soil is identified as Tehachapi sandy loam. This soil is described as well drained soil found on terraces and alluvial fans. It formed from alluvium derived from granite. Copies of the geologic map and soil survey report are included in Appendix B.

According to the Earthquake Fault Zones map of California, no faults have been mapped at the Site. No visual evidence of faults or fissures was observed during our Site reconnaissance.

Based on the USGS Cummings Mountain Quadrangle topographic map (7.5-Minute Series) the average elevation of the Site is approximately 3,950 feet above mean sea level (see Figure 1, Appendix A).

6.3 VICINITY SURFACE DRAINAGE

Natural drainage at the Site is generally interpreted to be toward the west, conforming to the natural topography in the area. Stormwater run-off is anticipated to follow the natural pattern. Standing water was not observed on the Site on the date of our reconnaissance.

According to the Federal Emergency Management Agency (FEMA), the Site is located in Zone X, which is an area outside the 100-year flood plain (Community-Panel No. 06029C-3225E, September 26, 2008). The applicable portion of the FEMA map is included in Appendix B.

6.4 HYDROGEOLOGY

According to a review of historical groundwater data (California Department of Water Resources and California State Water Resources Control Board groundwater well data), depth to groundwater has been documented at greater than 70 feet in the general Site area, with a flow direction toward the west. The Water Data Library report for a nearby well is included in Appendix B.

7.0 ENVIRONMENTAL REGULATORY RECORDS REVIEW

The records review is conducted to help identify known recognized environmental conditions at the Site and/or on adjacent or nearby properties which may have impacted the subject Site.

7.1 ENVIRONMENTAL DATABASE RECORDS SEARCH

GEOTEK obtained and reviewed an environmental database report of the federal and state environmental records specified by ASTM E 1527-13. The database report was provided by Environmental Data Resources, Inc. (EDR) of Shelton, Connecticut. Additionally, orphan or unmappable sites listed by EDR were reviewed for the approximate minimum search distances noted and included in our discussion, if applicable. Refer to Appendix E for a copy of the database report.

ENVIRONMENTAL DATABASE	MINIMUM			
U.S. Environmental Protection Agency (EPA) - National Priorities List (NPL), including delisted NPL	1.0 Mile	No	0	0
EPA – Superfund Enterprise Management System (SEMS), including archived sites (formerly CERCLIS)	0.5 Mile	No	1	1
EPA – Resource Conservation and Recovery Act (RCRA), Corrective Action Facilities (CORRACTS)	1.0 Mile	No	0	0
EPA – RCRA, Transportation, Storage, and Disposal facilities (TSD)	0.5 Mile	No	0	0
EPA - RCRA Generators	Site and Adjacent	No	1	1
EPA – Emergency Response Notification System (ERNS)	Site	No	N/A	0
Federal institutional control/engineering control registries	Site	No	N/A	0
California Environmental Protection Agency (CEPA) – State Response Sites (SRS, formerly Annual Work Plan and Bond Expenditure Plan)	1.0 Mile	No	0	0
CEPA – EnviroStor Database (formerly CALSITES)	0.5 Mile	No	0	0
CEPA – CHMIRS - California Hazardous Materials Information Reporting System	Site	No	No	0



ENVIRONMENTAL DATABASE	MINIMUM DISTANCE			
CEPA - Solid Waste Fill/Landfill (SWF/LF), Solid Waste Assessment Test (SWAT)/Waste Management Unit Database System (WMUDS), and Solid Waste Recycling Facilities (SWRCY)	0.5 Mile	No	2	2
CEPA – Leaking Underground Storage Tanks (LUST)	0.5 Mile	No	1	1
CEPA – Underground Storage Tanks (UST), including historic USTs	Site and Adjacent	No	1	1
CEPA – Spills, Leaks, Investigations & Cleanup Cost Recovery Listing (SLIC)	0.5 Mile	No	0	0
State institutional control/engineering control registries	Site	No	N/A	0
Local and/or Tribal databases	Up To 1.0 Mile	No	0	0
Other databases	Up To 0.5 Mile	No	1	1
Unmappable	Up To 1.0 Mile	No	1	1

N/A – Not Applicable

7.2 DISCUSSION OF REGULATORY RECORDS

7.2.1 National Priority List

The National Priority List (NPL) is the EPA's list of confirmed or proposed Superfund sites. Our review of this data includes sites which have been delisted from the NPL. The NPL is searched for a 1.0-mile distance.

The Site does not appear on the NPL. There are no facilities on the NPL within 1.0 mile of the Site.

7.2.2 Superfund Enterprise Management System

The Superfund Enterprise Management System (SEMS, formerly CERCLIS) is a compilation of sites that the EPA has investigated or is currently investigating for a release or threatened

release of hazardous substances. Our review of SEMS sites includes archive (no further remedial action planned) facilities. The SEMS list is searched for a 0.5-mile distance.

The Site does not appear on the SEMS list. The Parcel appears on the SEMS database.

The CCI appears on the SEMS list, but indicates a state/local lead. This listing appears to be associated with the LUST case, which will be discussed further in Section 7.2.10.

There are no additional facilities on the SEMS list within 0.5 mile of the Site.

7.2.3 Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act compile selective information on facilities which generate, transport, store, treat and or dispose of hazardous waste. RCRA facilities can be listed on one of three databases:

- ◆ *Corrective Action Facilities (CORRACTS)* are facilities undergoing corrective action. A corrective action order is issued pursuant to RCRA Section 3008(h) when there has been a release of hazardous waste or constituents into the environment from a RCRA facility. The CORRACTS list is searched for a 1.0-mile distance.

The Site does not appear on the CORRACTS list. There are no facilities on the CORRACTS list within 1.0 mile of the Site.

- ◆ *Transportation, Storage, and Disposal Facilities (TSD)* includes facilities that transport, store or dispose of hazardous waste and are not listed on the RCRA Generators list. The TSD is searched for a 0.5-mile distance.

The Site does not appear on the RCRA TSD list. There are no facilities on the RCRA TSD list within 0.5 mile of the Site.

- ◆ *Generators List* identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA Generators database is a compilation by the EPA of reporting facilities that generate hazardous waste. The RCRA generators list is searched for the Site and adjacent properties.

The Site is not listed on the RCRA Generators list. The adjacent Parcel is listed as a RCRA Generator.

The CCI is listed as a Small-Quantity generator, although it has historically been a Large-Quantity generator. The waste generated is not reported. However, there are no violations recorded. Based on this, it is our opinion that the adjacent CCI facility does not represent a recognized environmental condition to the Site.

7.2.4 Emergency Response Notification System

The Emergency Response Notification System (ERNS) is a national database used to collect information on reported releases of oil or hazardous substances. The ERNS list is searched for the Site. The Site does not appear on the ERNS list.

7.2.5 Federal Institutional Control/Engineering Control Registries

The EPA maintains two databases which list sites that have institutional and/or engineering controls in place as part of their operations. These databases are searched for the Site. The Site does not appear on either of these databases.

7.2.6 State Response Sites

The State Response Sites (SRS) records are the state equivalent to the federal National Priorities List (NPL) database. The SRS is searched for a 1.0-mile distance.

The Site does not appear on the on the SRS. There are no SRS facilities listed within a 1.0-mile distance of the Site.

7.2.7 EnviroStor Database

The EnviroStor Database (ENVIROSTOR, formerly CALSITES) records are the state equivalent to the federal CERCLIS database. EnviroStor is searched for a 0.5-mile distance.

The Site does not appear on the ENVIROSTOR database. There are no ENVIROSTOR facilities listed within a 0.5-mile distance of the Site.

7.2.8 California Hazardous Material Incident Report System

The California Hazardous Material Incident Report Systems (CHMIRS) is a state database used to collect information on reported hazardous materials incidents (accidental leaks and spills). The CHMIRS list is searched for a 0.25-mile distance.

The Site does not appear on the CHMIRS list. The adjacent CCI facility does.

There were six (6) different incidents reported, all involving spills or leaks from trucks or motorized equipment. In each case the material was remediated. It is our opinion these listings do not represent a recognized environmental condition to the Site.

There are no additional CHMIRS facilities located within 0.25 mile of the Site.

7.2.9 Solid Waste Facilities List

The Solid Waste Fill/Landfill (SWF/LF), Solid Waste Assessment Test (SWAT), Solid Waste Information System (SWIS), and Waste Management Unit Database System (WMUDS) databases includes information pertaining to closed and open solid waste facilities operating in the state of California. The California Solid Waste Recycling information database (SWRCY) includes facilities that engage in recycling activities. The SWF/LF, SWAT, SWIS, WMUDS and SWRCY databases are searched for a 0.5-mile distance.

The Site does not appear on the SWF/LF, SWAT, SWIS, WMUDS, or SWRCY lists. The adjacent Parcel appears on the SWIS list twice.

One listing is identified as CCI Main Landfill, an unpermitted landfill no longer in use. According to Mr. Read, the old landfill is located over half a mile to the northwest of the Site. The second listing is identified as the Women's Prison Burn Dump. Mr. Read indicated it too was over half a mile away. Both landfills are closed, and no records of spills, leaks, or violations are recorded. Therefore, it is our opinion that these facilities do not represent a recognized environmental condition to the Site.

There are no additional facilities on the SWF/LF, SWAT, SWIS, WMUDS, or SWRCY lists within 0.5-mile of the subject Site.

7.2.10 Leaking Underground Storage Tanks List

The California Leaking Underground Storage Tanks (LUST) list is a compilation of petroleum storage tank sites that have reported a release. The LUST list is searched for a 0.5-mile distance.

The Site did not appear on the LUST list. The adjacent CCI facility does appear on the LUST list.

According to records from the California Regional Water Quality Control Board, Central Valley Region (RWQCB), a leak was reported in 1987 during removal of two underground storage tanks. Soil and groundwater were found to be impacted by gasoline (including methyl-tertiary-butyl-ether [MTBE] and diesel. The source area is identified as the Motor Pool, located approximately 2,000 feet east of the Site. Investigations determined the groundwater was between 50 and 85 feet deep, with a flow direction to the west. Groundwater remediation via pumping and treatment, vapor extraction, and soil disposal were utilized to remediate the leak (URS 2014). The last quarterly monitoring report was issued in August 2014. A pre-closure letter was issued by the RWQCB in November 2014. Monitoring wells were reported destroyed in April 2015, and the facility was issued “Case Closed” status in December 2015. Copies of the URS 2014 report, the pre-closure letter, and the Well Decommissioning Report (URS 2015) are included in Appendix D. A copy of the closure letter could not be located, but the RWQCB records indicate a date of December 10, 2015.

There are no additional facilities listed on the LUST list within 0.5 mile of the Site.

7.2.11 Underground Storage Tanks List

The California Underground Storage Tank (UST) list is a compilation of petroleum storage tank sites that are registered with the state of California. The UST list is searched for the Site and adjacent properties.

The Site does not appear on the UST list. The adjacent Parcel appears on the UST list.

The CCI is listed as currently having two (2) USTs and up to seven (7) former USTs. The former USTs contributed to the LUST case discussed in Section 7.2.10. The current USTs are reported to be double-walled and have not reported leaks or spills. They are also located approximately 2,000 feet west of the Site. Therefore, it is our opinion that these USTs do not represent a recognized environmental condition to the Site.

7.2.12 Spills, Leaks, Investigation and Cleanup Cost Recovery Listing (SLIC)

The SLIC database is compiled by the CEPA California Regional Water Quality Control Board, San Diego Region. It is designed to protect and restore water quality from spills, leaks, and similar discharges. The SLIC is searched for a 0.5-mile distance.

The Site does not appear on the SLIC. There are no SLIC facilities listed within a 0.5-mile distance of the Site.

7.2.13 State Institutional Control/Engineering Control Registries

The State of California maintains institutional and engineering control databases or registries. This lists sites with engineering or institutional controls in place. Institutional controls include administrative measures intended to prevent exposure to contaminants remaining on site. Engineering controls include various forms of caps, building foundations, liners, and treatment methods. The State Institutional Control/Engineering Control Registries is searched for the Site.

The subject Site does not appear on the State Institutional Control/Engineering Control Registries.

7.2.14 Tribal Databases

Tribal governments are under the jurisdiction of the EPA for environmental concerns. Currently, the EPA Region 9 publishes LUST and UST information for tribes in Arizona, California, Hawaii, Nevada, and the Pacific Territories. The LUST database is searched for 0.5 mile, and the UST database is searched for 0.25 mile.

The Site does not appear on the Tribal LUST or UST databases. No facilities were identified on the Tribal LUST or UST databases within 0.5 mile of the Site.

7.2.15 Other Databases

EDR compiles information from multiple federal, state, local, and proprietary databases. Most are secondary or tertiary or redundant. Facilities compiled on these other databases are evaluated based on the severity of the listing, distance, and location.

The adjacent Parcel appears on several databases, all of which appear to be redundant to the databases previously discussed.

7.2.16 Unmappable Facilities

The database report usually contains a list of facilities that, for one reason or another, cannot be properly geocoded on a map.

The adjacent CCI facility was reported five (5) times on the unmappable facilities list in the database report. These listings appear to be part of the LUST case discussed in Section 7.2.10.

7.3 LOCAL REGULATORY AGENCY RECORDS

GeoTek contacted the Kern County Environmental Health Division (KCEHD) regarding underground or above ground storage tanks, hazardous material permits or business plans, emergency responses, spills, inspections, or other information of an environmental or hazardous nature.

As of the date of this report, the KCEHD has not responded to our request. When the information is made available, and if that information changes the conclusions or recommendations of this report, an addendum to this report will be issued.

8.0 VAPOR ENCROACHMENT SCREEN

The purpose of a Vapor Encroachment Screen (VES) is to identify, to the extent feasible, if a vapor encroachment condition exists at the Site.

Utilizing data from the environmental database report, it was determined that there are no current or historic auto stations, gas stations, or cleaners located up-gradient and/or within 600 feet of the Site. Therefore, it is our opinion that a vapor encroachment condition (VEC) does not likely exist at the Site.

9.0 SITE AND SURROUNDING AREA HISTORY

In order to construct the history of the Site and the surrounding area, GEOTEK reviewed reasonably ascertainable public documents, including aerial photographs, topographic maps, building records, city directories, fire insurance maps, and county assessor history records.

9.1 HISTORICAL SITE USAGE

9.1.1 Aerial Photograph Review

GEOTEK reviewed aerial photographs dated 1963, 1994, 1995, 2005, 2009, 2010, 2012, 2014, 2014-17, and 2017.

The 1963 aerial photograph shows the Site to be vacant land.

The 1994 and 1995 aerial photographs show no significant changes from the 1963 photograph.

The 2005 aerial photograph shows dirt roads transecting the Site.

The remaining aerial photographs show no significant changes to the Site from the 2005 photograph. The 2017 photograph is included as Figure 3 in Appendix A.

9.1.2 Assessors Information

GEOTEK inquired about the ownership of the Site at the Kern County Assessor's Office. According to records, the Site is owned by the State of California.

9.1.3 Building Department Records

GEOTEK requested available building records for the Parcel at the Tehachapi Building Department. We were informed that permits for "the prison" were not on file, as they are kept at the State Architects office in Sacramento. Therefore, building records for the Parcel are not reasonably ascertainable.

9.1.4 Chain of Title

GEOTEK has not received, nor was authorized to obtain Chain-of-Title documents as part of this assessment. The provided Title Report is not a chain-of-title document.

9.1.5 City Directory Review

As the Site has no specific address, and has been part of the CCI campus since at least 1943, historic city directories were not reviewed for this assessment.

9.1.6 Sanborn Map Review

Sanborn Fire Insurance Maps for the parcel were requested from EDR-Sanborn, which owns and maintains the largest and most complete collection of the maps. No coverage for the Site was available. The Sanborn Map Report is included in Appendix B.

9.1.7 Topographic Map Review

GEO TEK reviewed the Cummings Mountain Quadrangle topographic map (15-Minute Series) dated 1943 and Cummings Mountain Quadrangle (7.5-Minute Series), dated 1966, 2012, and 2018.

The Site appears to be vacant land on the topographic maps. The CCI was identified in the vicinity on all the maps. The 2018 map shows little detail beyond the streets in the vicinity. The 2012 map is included as Figure I in Appendix A.

9.2 HISTORICAL IMMEDIATELY SURROUNDING PROPERTY USAGE

9.2.1 Aerial Photograph Review

GEO TEK reviewed aerial photographs dated 1963, 1994, 1995, 2005, 2009, 2010, 2012, 2014, 2014-17, and 2017.

The 1963 aerial photograph shows the vicinity to be primarily vacant land, with the CCI facility to the west.

The 1994 aerial photograph shows detention ponds to the west, part of the CCI facility.

The 1995, 2005, 2009, and 2010 aerial photographs show no significant changes from the 1994 photograph.

The 2012 aerial photograph shows a solar power array present to the west. No other significant changes were observed from the previous photographs.

The remaining aerial photographs show no significant changes from the 2012 photograph. The 2017 photograph is presented as Figure 3 in Appendix A.

9.2.2 City Directory Review

Since the vicinity has been primarily part of the CCI, city directories were not reviewed as part of this assessment.

9.2.3 Sanborn Map Review

Sanborn Fire Insurance Maps for the Site were requested from EDR-Sanborn, which owns and maintains the largest and most complete collection of the maps. According to EDR, no coverage was available for the property; therefore, it is not likely that coverage would be available for the adjoining properties.

9.2.4 Topographic Map Review

GEO TEK reviewed the Cummings Mountain Quadrangle topographic map (15-Minute Series) dated 1943 and Cummings Mountain Quadrangle (7.5-Minute Series), dated 1966, 2012, and 2018.

The CCI was identified in the vicinity on all the maps. The 2018 map shows little detail beyond the streets in the vicinity. The 2012 map is included as Figure 1 in Appendix A.

9.3 HISTORICAL USE SUMMARY

Based on readily available historic information, the Site appears to have been primarily vacant land since at least 1943. The vicinity has been generally vacant, with the correctional institution present, since 1943. The ponds to the west were present by 1994, and the solar array to the west was present by 2012. No historic recognized environmental conditions were identified.

No historic information was readily available or reasonably obtainable prior to 1943. This represents data failure according to ASTM E 1527-13. Data gaps from 1943 to 1963, 1966 to 1994, and 1995 to 2005 are due to the limited resources which are readily available and reasonably ascertainable in the local area. However, it is our opinion that additional historic information, if it were to become available, is not likely to change the conclusions or recommendations of this assessment.

10.0 SIGNIFICANT DATA GAPS

No significant data gaps were discovered while performing this Phase I Environmental Site Assessment. Therefore, it is our opinion that sufficient information was obtained to identify current Site conditions and past Site usage.

Minor data gaps include:

- ◆ Gaps in the historic records from 1943 to 1963, 1966 to 1994, and 1995 to 2005;
- ◆ GEOTEK was not provided with, nor authorized to obtain, a chain-of-title report for this assessment;
- ◆ As of the date of this report, the KCEHD has not responded to our request for information.

However, it is our opinion that additional information, if it were to become available, is not likely to change the conclusions or recommendations of this assessment.

11.0 CONCLUSIONS AND RECOMMENDATIONS

GEOTEK has performed a Phase I Environmental Site Assessment (ESA) for the subject Site in substantial conformance with the scope and limitations of ASTM E 1527-13 and GEOTEK Proposal No. P1100817-CR, dated November 2, 2017. Any exceptions to, or deletions from, this practice are described in the appropriate section(s) of this report.

This Phase I Environmental Site Assessment has not revealed evidence of a recognized environmental condition at the subject Site. No further investigation is recommended at this time.

12.0 CERTIFICATIONS

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

The qualifications of the Project Team are included in Appendix F.

We appreciate this opportunity to be of service. If you have any questions, or if we can be of further service, please contact us at (951) 710-1160.

Sincerely,
GEOTEK, INC.



J. Michael Batten, CEM, REPA
Environmental Services Manager
Registered Environmental Property Assessor No. 113162
(Expires 06/15/19)

1863-CR-ESA-Report-ForeFront-DGS CCI-JMB-101918

13.0 REFERENCES

CALIFORNIA, STATE OF

- ◆ Geologic Survey
 - Geologic Atlas of California, Bakersfield Sheet, 1964
 - Seismic Hazard Zones inquiry
- ◆ Regional Water Quality Control Board, Central Valley Region
 - Records review
- ◆ State Water Resources Control Board
 - GeoTracker database inquiry
- ◆ Toxic Substances Control, Department of
 - EnviroStor database inquiry
- ◆ Water Resources, Department of
 - Hydrologic data

CALIFORNIA CORRECTIONAL INSTITUTION

- ◆ Personal interview with Mr. Jon Read
- ◆ Personal interview with Mr. Michael Lee

ENVIRONMENTAL DATA RESOURCES, INC.

- ◆ Certified Sanborn Map Report, Inquiry No. 5433303.5, September 24, 2018
- ◆ Radius Map Report, Inquiry No. 5433303.2s, September 24, 2018

FOREFRONT POWER

- ◆ User Questionnaire prepared by Mr. Sean McCartney

GOOGLE EARTH

- ◆ Aerial photograph dated 2017

TEHACHAPI, CITY OF

- ◆ Building Department
 - Inquiry

KERN COUNTY

- ◆ Assessor
 - Parcel Map
 - Inquiry

- ◆ Environmental Health Division
Records inquiry
- ◆ Recorder
Records inquiry

NATIONWIDE ENVIRONMENTAL TITLE RESEARCH

- ◆ Aerial Photographs dated 1963, 1994, 1995, 2005, 2009, 2010, 2012, and 2014

URS

- ◆ *“Second Quarter 2014 Groundwater Monitoring Report and Sensitive Receptor Survey”*, August 5, 2014
- ◆ *“Well Decommissioning Report”*, April 30, 2015

U.S. GOVERNMENT

- ◆ Drug Enforcement Agency
Records inquiry <http://www.dea.gov/seizures>
- ◆ Federal Emergency Management Agency (FEMA)
Flood Insurance Rate Map, Community-Panel Number 06029C-3225E,
September 26, 2008
- ◆ Geological Survey
Cummings Mountain Quadrangle, 15-Minute Series topographic map, 1943,
Cummings Mountain Quadrangle, 7.5-Minute Series topographic map, 1966,
2012, and 2018
- ◆ Natural Resources Conservation Service
“Custom Soil Resource Report for Kern County, California, Southeastern Part”,
2018 with aerial photograph dated 2014-2017