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June 2, 2020
Project No. 3611-SD

Nolen Communities, LLC
1680 North Coast Highway, Unit 51
Encinitas, California 92024

Attention: Mr. Sean Kilkenny

Subject: Soil Management Plan
Fox Point Farms
1150 Quail Gardens Drive
City of Encinitas, San Diego County, California

References: See Page 4

Dear Mr. Kilkenny:

As requested, GeoTek, Inc. (GeoTek) has prepared this Soil Management Plan (SMP) for the excavation of TPH impacted soil at the subject site.

Based on a review of a *Fox Point Farms Concept Plan A* prepared by Schmidt Design Group, dated October 8, 2019, we understand that the project structure type varies from two-story bungalows to three-story multi-family residential buildings, a recreational area and commercial space.

Previous work at the site by this firm includes a *Phase I Environmental Site Assessment* (GeoTek, 2019a), a *Geotechnical Investigation* (GeoTek, 2019b), a *Limited Additional Soil Sampling* (GeoTek, 2020a) and a *Report of Supplemental Sampling Results* (GeoTek, 2020b).

A subsurface evaluation was performed and a report was prepared presenting our findings, conclusions, and recommendations (GeoTek, 2020a). Fifteen (15) locations ranging at depths between the surface and two (2) feet below surface were selected across the Site. The samples were analyzed for total petroleum hydrocarbons (TPH), organo-chlorinated pesticides (OCPs), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, arsenic and selectively for polychlorinated biphenyls (PCBs).

The soil sampling revealed evidence of subsurface contamination with heavy oils resulting from a leaking trash compactor at the Site (GeoTek, 2020a). Based on results from GB-1

(surface sample), TPH in the diesel range (diesel range organics [DROs]) and mid-range organics (MROs) were found to be 24,000 milligrams per kilogram (mg/Kg) and 44,000 mg/Kg, respectively. However, the sample taken at a depth of two (2) feet (GB-2) and five (5) feet to the north (directly downgradient) at the surface and two (2) feet below (GB-1+5-0 and GB-1+5-2) showed DROs and MROs below 100 mg/Kg (Figures 1A and 1B).

Samples GB-2 and GB-3 were also found to have TPH above the reporting limit. Sample GB-2 was found to have MROs at the surface sample to contain 340mg/kg and the 2 foot deep sample was found to contain 140 mg/kg (Figure 2). GB-3 was found to have MROs at the surface of 240 mg/kg and no detection at a depth of 2 feet (Figure 3).

Based on the assessments performed by this firm (GeoTek, 2019a, 2020a and 2020b), the impacted soil related to heavy oils were recommended and it is our continued recommendation that the heavy oil impacted site soils be removed and properly disposed of offsite in covered leak free containers. The estimated quantity of TPH impacted soil is approximately six (6) to eight (8) cubic yards of soil. Defining limits of the excavation will be determined by a competent person from GeoTek and preliminarily based on visual observations and a PID. Confirmation samples should be performed along the excavation sides at mid-height and bottom-central to confirm that the impacted soil has been mitigated.

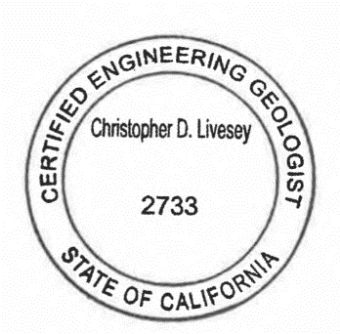
Although the area of the TPH impacted soils is relatively small and located within isolated locations of the site, site controls for the project will include fencing of the entire site prior to demolition, earthwork activities, etc. Signs instructing visitors to check in at the appropriate location on the project will be posted. Dust control will include the application of water while grading, excavating, etc. and limited vehicle speeds to 5-miles per hour or less on unpaved portions of the site. Additional dust control measures may be identified and implemented during the construction, especially if dry and windy conditions persist during the periods of earthwork.

Monitoring of the earthwork construction will be performed by competent personnel from our firm. If any unforeseen contamination is discovered via odor, vision, dust monitoring devices, etc. the work area will be ceased, and soil samples will be collected for possible contamination.

A completion report summarizing the site grading activities and verification sampling results will be prepared by GeoTek.

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 (760) 599-0509.

Respectfully Submitted,
GEOTEK, INC.



Christopher D. Livesey
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ENCLOSURES

Figure 1 – TPH Impacted Area (Trash Compactor)
Figure 2 – TPH Impacted Area (GB-2)
Figure 3 – TPH Impacted Area (GB-3)

REFERENCES

GeoTek, Inc., 2019a, "Phase I Environmental Site Assessment, Fox Point Farms Project, 1150 Quail Gardens Drive, Encinitas, San Diego County, California 92082" Project No. 3611-SD, dated November 18.

_____, 2019b, "Preliminary Geotechnical Evaluation, Fox Point Farms, 1150 Quail Gardens Drive, Encinitas, California," Project No. 3611-SD, dated November 27.

_____, 2020a, "Limited Additional Soil Sampling, Fox Point Farms Project, 1150 Quail Gardens Drive, Encinitas, San Diego County, California 92082" Project No. 3611-SD, dated January 28.

_____, 2020b, "Report of Supplemental Sampling Results, Fox Point Farms Project, 1150 Quail Gardens Drive, Encinitas, San Diego County, California 92082" Project No. 3611-SD, dated May 20.

San Francisco Bay Regional Water Quality Control Board, Environmental Screening Levels, dated January 25, 2019

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NORTH

Figure 1A

TPH Impacted Area (Trash Compactor)

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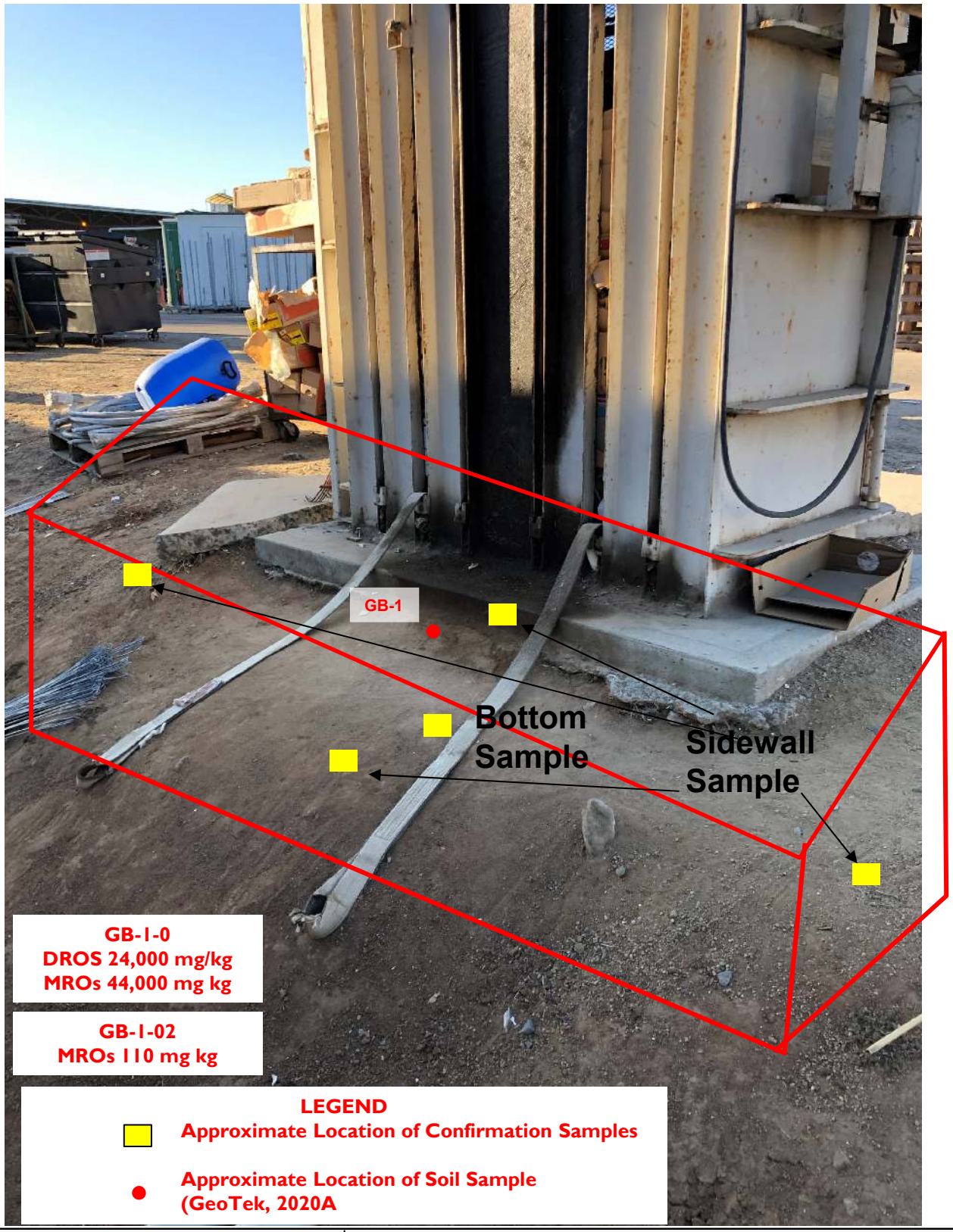

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NORTH

Figure 1B

TPH Impacted Area (Trash Compactor)

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LEGEND

Approximate Location of Confirmation Samples

Approximate Location of Soil Sample (GeoTek, 2020A

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Figure 2

TPH Impacted Area (GB-2)

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LEGEND

Approximate Location of Confirmation Samples

Approximate Location of Soil Sample (GeoTek, 2020A

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Figure 3

TPH Impacted Area (GB-3)

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