



TETRA TECH

May 19, 2021

Mr. Jose Capati
USA Portola East, LLC
20 Corporate Plaza Drive
Newport Beach, CA 92660

**Subject: Soil Stockpile Excavation Dust Monitoring
Portola Hills Northeast
Northeast of Glenn Ranch Road and Viejo Ridge Drive
Lake Forest, California**

Dear Mr. Capati:

In accordance with the request, Tetra Tech, Inc. (Tetra Tech) is pleased to present this Dust Monitoring Plan for the planned soil excavation and soil disposal activities at the above referenced project. It is Tetra Tech's understanding that Empire Equipment personnel will excavate approximately 20,000 cubic yards of material from an existing stockpile that is located within the Portola Hills Northeast residential site for transportation and disposal at a permitted disposal facility. The work is anticipated to begin on May 19, 2021 and will continue for approximately 3 to 4 weeks, with no soil excavation activities to be occurring during weekends.

The Tetra Tech Team (Tetra Tech and StrongArm Environmental) have been scoped to visually observe and monitor soil excavation and loading of soil into trucks for transportation to an off-site disposal facility. The technician will monitor ambient air with a photoionization detector (PID) within the breathing zone downwind from the soil excavation and loading activities for the detection of organic compounds in air. The technician will also monitor five TSI 8533 Dust Track DRX monitors that will be setup along the property perimeter at upwind, downwind and crosswind locations and as far as possible from the soil excavation and loading operations to monitor for visible nuisance dust and dust particles that may be detected by the Dust Track monitor devices (Figure 1). If readings on the Dust Track register at established action levels for dust or if the PID registers organics detections at three times background levels, the technician will request that the Baldwin and Sons Site representative ask that the on-site water truck(s) deliver more water to the soil stockpile to enhance dust suppression activities.

All soil excavation and loading, and instrument monitoring observation activities will be performed in compliance with CA Code of Regulations Title 8 General Industry and 29 CFR 1910 and 29 CFR 1926 Construction regulations.

We understand that Empire Equipment operators will perform soil excavating, loading and on-site hauling activities within the closed cabs of the equipment. Empire Equipment operators will have access to dusk masks if for any reason they need to step out of the equipment cab during active soil excavation and loading activities. On-site Baldwin & Sons personnel will also have access to dust masks should any of their daily activities require their presence on-site during active soil excavation and loading activities.

Air monitoring will be performed at the Site during all soil disturbance activities and will include:

- Monitoring nuisance dust levels downwind and crosswind and as far as possible from the soil excavation and loading and hauling activities along the perimeter of the property line. In the event that nuisance dust levels exceed the Site or community action levels presented in the chart below, the air monitoring professional will request the Baldwin & Sons Site representative to direct Empire Water Truck personnel to apply additional water to the soil excavation area to enhance dust suppression activities during soil excavation and loading activities until the dust levels decrease to an acceptable level.
- The Strongarm Environmental technician conducting the nuisance dust air monitoring activities will be responsible for the daily calibration of the Dust Track real-time aerosol monitors.
- The on-site Strongarm technician will continuously monitor airborne dust levels for dusts generated by soil excavation activities. The on-site Strongarm technician will base Site safety procedures, including dust control measures, on the Action Levels specific in the chart below:

Exposure Guidelines for Site Hazards					
Chemical Name	Odor Threshold	Cal/OSHA PEL^a	ACGIH TLV^b	Site Action Levels^c	Community Action Level (Fenceline)^d
Nuisance Dust (Respirable Fraction)	Not Listed	5 mg/m ³	5 mg/m ³	2.5 mg/m ³	0.05 mg/m ³

- Notes:
- a PELs per California OSHA Article 107, Table AC1.
- b TLVs for Chemical Substances and Physical Agents and Biological Exposure Indices (ACGIH,1990-1991).
- c Site Action Level is calculated as one half of TLV or PEL (as measured by NIOSH methods), whichever is smaller. If a Site Action Level is equaled or exceeded, then additional dust mitigation measures will be implemented.
- d Community action level for total dust/particulate is based on SCAQMD regulations. Site dust levels will be measured using real-time aerosol monitors
- PEL Permissible Exposure Limit
- TLV Threshold Limit Value
- ACGIH American Conference of Governmental Industrial Hygienists
- ppm parts per million
- mg/m³ milligrams per cubic meter

This monitoring plan is flexible in respect to if the dust suppression watering activities are not able to control dust or organic compound emissions from a particular area where excavation, loading and hauling activities are occurring, then work will be temporarily suspended in that area and shifted to another area until adequate water suppression activities can be resumed. Should it be determined that additional effort or application of vapor/odor control products may be required, the plan will be adjusted to accommodate the additional measures.

**Sincerely,
Tetra Tech, Inc.**

A handwritten signature in black ink that reads "Dave Brown". The signature is written in a cursive, flowing style.

**Dave Brown
Project Manager**