

28 May 2020

Murphy's Bowl LLC
c/o Chris Holmquist
Wilson Meany, L.P.
6701 Center Drive, Suite 950
Los Angeles, California 90045

Subject: Hexavalent Chromium Detections in Soil
Inglewood Basketball and Entertainment Center Project
(EKI B71091.00)

Dear Mr. Holmquist:

This follows up on the *Inglewood Basketball and Entertainment Center Project Investigations* and *Inglewood Basketball and Entertainment Center Project Soil and Soil Gas Investigations* memoranda prepared by EKI dated 28 June 2019 (EKI Reports). Among other things, the EKI Reports include reported results of hexavalent chromium in soil concentrations below the commercial Regional Screening Level ("RSL") and above the residential RSL for soil samples three locations taken at the IBEC Project Site within the areas identified as the Arena Site, Western Parking Structure and Well Site areas in the EKI Reports.

Hexavalent chromium is most commonly associated with industrial uses such as electroplating, stainless steel production, leather tanning, textile manufacturing, and wood preservation. It is also associated with drilling muds from oil and gas operations. As described in the EKI Reports, no such past or present industrial uses have been identified at the IBEC Project Site; thus, there is no evidence of past or present sources of hexavalent chromium at the IBEC Project Site. Furthermore, hexavalent chromium concentrations in soil from such industrial uses would be expected to be several times higher than the residential and commercial RSLs, rather than the slightly elevated detected concentrations in the IBEC Project Site sample results.

As noted in the EKI Reports, the results indicated hexavalent chromium detections in method blank samples associated with the analyses of the soil samples in the Western Parking Structure and Well Site areas. A method blank is a sample of clean material prepared and analyzed at the analytical laboratory, and thus should not contain the analytes being measured. Method blank detections can be caused by issues such as contamination of laboratory equipment or the method blank material by the substance being tested for.

EKI has encountered similar issues at other sites in Southern California, where laboratory results indicated detection of low-level hexavalent chromium at soil concentrations above the residential RSL value in soil without known or suspected sources, and hexavalent chromium was also detected in the laboratory method blank samples. In those situations, EKI was able to confirm that hexavalent chromium was in fact not present at concentrations above the RSL in soil.

The digestion method used in the laboratory process likely elevated the reported hexavalent levels at all three locations, including the Arena site. A digestion method is a decomposition of a sample from a solid into a liquid by dissolving the sample in a solution; the choice of solution will significantly affect the concentrations of analytes in the liquid sample. The standard method for digestion of hexavalent chromium uses an alkaline solution; this method is known to convert some trivalent chromium, which is naturally occurring in soil at much higher concentrations than hexavalent chromium, to hexavalent chromium during digestion. In the case of the IBEC Project Site, the detections of hexavalent chromium indicated in the laboratory results are likely caused by those same issues and do not indicate the likely presence of elevated hexavalent chromium concentrations in soil within the IBEC Project Site.

Based on the known history of the IBEC Project Site, past experience with the laboratory that prepared the analysis, the testing method, and project experience at other sites, it is EKI's professional judgment that the results reported do not indicate the presence of hexavalent chromium above the residential RSL within the IBEC Project site.

Mitigation Measure 3.8-4 of the IBEC Project EIR requires the preparation, approval, and implementation of a soil management plan, which will include additional investigation to address the results of the June 2019 report and confirm that hexavalent chromium is not present within the IBEC Project site. Even if such investigation were to reveal hexavalent chromium above the residential RSL but below the commercial RSL, the removal of such soil would not require special handling or disposal procedures and could be taken to the same disposal facility as any excavated soils from the site.

If you have any questions, please contact me at (650) 292-9100.

Very truly yours,

EKI ENVIRONMENT & WATER, INC.



James Yoon, P.E.
Project Manager