

Elizabeth Gonzalez, P.E.
Managing Principal Engineer
Waterstone Environmental, Inc.

I am currently a Managing Principal Engineer for Waterstone Environmental. I am a Registered Professional Civil Engineer and have 38 years of experience in environmental engineering and project management gained as a regulator and as a consultant.

As a project manager for the Department of Toxic Substances Control - California Environmental Protection Agency (DTSC - Cal EPA), I managed State and Federal Superfund sites and was involved in the remedial investigation, feasibility study, and remedial action stages of the cleanup process. While at DTSC, I also managed permitting projects for treatment, storage, and disposal (TSD) facilities seeking an operating permit or undergoing Resource Conservation and Recovery Act (RCRA) closure. As a result of being a regulator and being intimately involved with the state and federal regulatory process, I developed a sound understanding of environmental laws and regulations. My background as an engineer with knowledge in construction and industrial operations along with a strong understanding of environmental laws and regulations resulted in my expertise in regulatory compliance related to operating industries and in the investigation and cleanup of historical industrial facilities.

I have managed several projects from the assessment/investigation phase through the remediation phase resulting in “no further action” closure from various regulatory agencies. My expertise in site characterization, remediation, and regulatory issues has proven a critical component in developing unique and cost-effective solutions to bring projects to a successful closure. My extensive experience managing projects to obtain regulatory closure on environmental issues and providing regulatory compliance services has translated into my ability to provide expert witness and litigation support services.

Education and Registrations

- B.S., Civil Engineering, University of Texas at El Paso, 1988
- Registered Professional Engineer, Civil Engineering, California, Registration Number C 052301

Specialized Training and Certifications

- Qualified Industrial Storm Water Practitioner
- 40-hour Hazardous Waste Site Operation Course, Pursuant to OSHA 29 CFR 1910.120
- Management and Supervisor Training, Pursuant to OSHA 29 CFR 1910.120
- Environmental Auditing Certificate Program, California State University Long Beach (CSULB), 1990
- California Environmental Protection Agency – RCRA Permit Writer Training

Capabilities

- Litigation Support/Expert Witness
- Regulatory Compliance Support
- Agency Negotiations/Facility Closure
- Due Diligence and Phase I Environmental Assessments
- Remedial (Phase II) Investigation
- Feasibility Studies/ Remedial Action Planning
- Construction Management Engineering/Remediation

Representative Project Experience Summary

Litigation Support/Expert Witness Services

- Provided litigation support to the City of Torrance (Plaintiff) in the case (USDC Case No. 2:17-CV-07732-FWS-JPR) brought against Hi-Shear Corporation, et al. (Defendants). I prepared an Expert Report on behalf of the Plaintiff to offer three opinions. My first opinion was that environmental work conducted by the Plaintiffs was consistent with the NCP and in substantial compliance with applicable requirements in 40 CFR Part 300. My second opinion was that the environmental work conducted by the Plaintiff constituted reasonable and necessary steps towards achieving a CERCLA-quality cleanup. My third opinion was that the environmental response costs represented recoverable, reasonable and necessary costs

I prepared an Expert Report to rebut the Defendant's expert. My rebuttal opinions included (1) a technical defense of the Plaintiff's selected remedy, (2) a finding that response costs presented by the Defendant did not meet the requirements of set forth in 40 CFR 300.160 and were not consistent with the NCP, and (3) impacts to soil vapor and groundwater caused by the Defendant created an imminent and substantial endangerment to public health and the environment.

I provided deposition and trial testimony.

- Provided litigation support to the L.A. Terminals, Inc. (Plaintiff) in the case (United States District Court (USDC) Case No. 5:21-cv-01238-GB-SPUSDC Case No. 2:18-cv-06754-MWF-RAO) against the City of Los Angeles, et.al. (Defendants). I prepared an Expert Report on behalf of the Plaintiff. My opinions related to response costs incurred by the Plaintiff and the necessity and consistency of Plaintiff's actions and costs under the federal National Contingency Plan. I also provided deposition testimony.
- Provided litigation support to the Harold Igdaloff (Defendant) in the case (USDC Case No. 2:17-cv-4059-MCS (JEMx)) brought against him by George Torres (Plaintiff). I prepared an Expert Report to offer rebuttal opinions in response to Expert Reports prepared on behalf of the Plaintiff. My opinions related to Plaintiff's Innocent Landowner (ILO) claim under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), claim of having completed an "all appropriate inquiry" per CERCLA and a claim that environmental work performed was NCP compliant. I also provided deposition testimony.
- Provided litigation support to the City of Garden Grove. (Defendant) in the case (USDC Case No. 8:21-cv-1072-DOC-ADS) brought against Garden Grove by Jonathan H. Cannon, et. Al., (Plaintiffs) for cost recovery under CERCLA and contribution under the

California Health and Safety Code. I prepared an Expert Report on behalf of the Defendant to offer two opinions. My first opinion was that the Plaintiffs did not establish that the City of Garden Grove is a responsible Party as defined in CERCLA and the Hazardous Substance Account Act (HSAA); therefore, cost recovery under CERCLA and NCP or the HSAA was appropriate. My second opinion was that the actions taken by the Plaintiff, as a private party, were not consistent with the National Contingency Plan (NCP) as required for cost recovery.

I prepared an Expert Report to rebut the Plaintiff's expert. My opinions in the rebuttal report included (1) CERCLA liability protections related to an Innocent Landowner did not apply to the Plaintiff, (2) Releases of solvents occurred prior to and during the Plaintiff's ownership of the property, (3) Cost documentation provided by the Plaintiff did not meet the requirements of set forth in 40 CFR 300.160 and were not consistent with the NCP.

I also prepared a presentation for mediation and participated in mediation discussions.

- Provided litigation support to Plaintiffs Safety-Kleen Systems, Inc. and Clean Harbors Buttonwillow, LLC, in the matter of *Safety-Kleen Systems, Inc. and Clean Harbors Buttonwillow, LLC, vs. Alco Iron & Metal Company, et al.* Case No. BCV-24-100887. I began preparing an Expert Report to offer my opinion that the defendant did not follow waste determination requirements dictated by laws and regulations and based on information provided to counsel a favorable settlement was secured for the Plaintiffs and the completion of the Expert Report was not required.
- Provided litigation support to Defendants Sims Group USA Corporation ("Sims Group") and SA Recycling in the connection with the case entitled, *DP Etiwanda, LLC., Plaintiffs, vs. Sims Group, et. al.*, USDC Case No. 5:21-cv-01238-GB-SP. I prepared an Expert Report to offer my opinion that the buyer did not conduct appropriate due diligence in accordance with ASTM International Standard for Environmental Site Assessments E-1527-13 and the All Appropriate Inquiry standard established in CERCLA and therefore did not qualify for the landowner liability protections afforded to an innocent landowner.
- Provided litigation support to the Department of Justice (DOJ) in their case against Parish Chemical, a chemical manufacturing facility in Utah. I evaluated the chemical manufacturing operations and solvent recycling methodologies. I also inventoried over 3,000 drums of material stored at the facility. I determined and documented that the facility was not recycling solvents in compliance with regulatory limitations but instead speculatively accumulating hazardous waste and essentially operating as an unpermitted RCRA hazardous waste storage facility. I prepared an Expert Report detailing noncompliance issues and prepared a RCRA facility closure cost estimate. Using two expert reports prepared by Waterstone, the DOJ obtained a court order that required the facility to cease operations, assessed \$100,000 in penalties for violations, and is entitled the DOJ to collect up to \$900,000 for a removal action conducted by the EPA.
- Provided expert testimony regarding the sampling of the domestic water supply, water sampling results at an apartment complex in Inglewood, California in response to a court mandated response to issues of unpleasant odor and color associated with the domestic water supplied to the Subject Property. Water to the apartment complex was found to be consistent with the quality of water provided by the water purveyor and with Maximum

Contaminant Levels (MCLs) mandated by the state of California. A review of water supply drawings provided by the property owner showed no illegal, unpermitted or incorrectly plumbed water connections in the building.

Regulatory Compliance

- At a southern California solvent recycling facility permitted as RCRA TSD facility, I prepared a Current Conditions Report, RCRA Facility Investigation Workplans and RCRA Facility Reports to comply with conditions of the facility's RCRA permit. I provided assistance for closure of one of the permitted units. Investigations of the facility are on-going and the facility has successfully obtained a renewal of their RCRA permit with expansion of the facility.
- At a southern California steel manufacturing facility, under EPA oversight, conducted investigations and ultimately the risk-based mitigation of polychlorinated biphenyls (PCBs) in accordance with Title 40 of the Code of Federal Regulations (40 CFR) Section 761.61 (c). Implementation of the EPA and DTSC approved Operation, Maintenance, and Monitoring Plan for the mitigation measures is ongoing.
- At a custom wheels manufacturing facility in Long Beach California, I conducted a compliance audit ahead of the sale of the business and identified several compliance issues. I then prepared a Stormwater Pollution Prevention Plan (SPCC), Spill Control and Countermeasures Plan (SPCC), and prepared Standard Operating Procedures (SOP) for hazardous material storage and disposal, respirator use, forklift use, inspection of equipment with South Coast Air Quality Management District (SCAQMD) permits and provided training to employees.
- At a southern California foreign car staging warehouse near a cargo ship off-loading area, conducted a compliance audit ahead of a regulatory inspection and identified several compliance issues then conducted a second inspection to verify compliance issues were rectified. During the facility inspection, I lead the County inspector through the facility. No violations or compliance issues were identified by the inspector.
- Prepared and certified Closure Plans in accordance with California Title 22-Tiered Permitting for a chrome plated wheel manufacturing facility in unincorporated Los Angeles County, California; for a brass hinge manufacturing facility in Los Angeles, California and for a compact disc manufacturing facility in Anaheim, California.
- Conducted a facility wide audit and provided assistance with compliance at Chrome plating "job shop" facility in the San Fernando Valley. Audited Permit by Rule treatment activities (DTSC), storm water pollution prevention (RWQCB), industrial wastewater discharge (LA DWP), hazardous waste generator activities (DTSC), and activities with permitted air emissions (SCAQMD). Assisted the facility in developing corrective actions for 58 findings of non-compliance.
- Provided consulting services to a Perkin Elmer facility to support the modification of their DTSC tiered permit for wastewater treatment.
- At a personal products manufacturing facility (designated as a pharmaceuticals manufacturing facility by the Los Angeles Bureau of Sanitation), conducted a detailed regulatory compliance audit; updated the facility's Industrial Wastewater Discharge

permit, SWPPP, SPCC Plan, hazardous materials business plan, and hazard communication program; updated facility inventory and determined hazardous waste designations; developed numerous SOPs for hazardous materials management and hazardous waste management; developed and provided training on SOPs; and coordinated with DTSC inspectors assessing the facility drum emptying area, emptying procedures, labeling, and empty drum storage area.

- Prepared environmental permits and plans required by Federal, State and local regulatory agencies, including National Discharge Pollution Elimination System (NPDES) permits, industrial wastewater discharge permits, hazardous materials business plans, compliance documentation for hazardous waste storage and treatment permitting, emergency contingency plans, permits for decommissioning and closure of equipment/facilities, grading permits in association with excavations, sewer connection closure permits in association with the removal of clarifiers.
- Prepared reports and obtained Industrial Wastewater Discharge permits by designing and retrofitting wastewater treatment systems for a compact disc manufacturing facility in Hollywood, California; a personal product manufacturing facility in Chatsworth, California; a confidential aircraft part manufacturing facility in Irvine, and for a city vehicle and equipment car wash at the City of Lancaster Maintenance Yard.
- Prepared and certified Spill Prevention Control and Countermeasure (SPCC) plans for Northrop's Commercial Aircraft Division Hawthorne Center in Torrance, California; the City of Lancaster Maintenance Yard; the City of Garden Grove Maintenance Yard; Virco Manufacturing Inc. in Torrance California; the Presidio of San Francisco; Levlad Manufacturing in Chatsworth, California; Padre Oil in Corona, California; Irvine Ranch Water District's Portola Hills Lift Station in Foothill Ranch California; and the Los Alisos Water Reclamation Plant in Lake Forest California, and others. The plans address both administrative and engineering measures to prevent oil spills resulting from onsite storage/handling, emergency response capabilities to address worst-case spill events, and implementation of emergency response procedures to reduce off-site impacts in the events of releases.
- Prepared and certified Storm Water Pollution Prevention Plans (SWPPP) for Industrial Activities at four Orange County Transportation Authority bus terminals; five Hugo NuProler auto shedding facilities; the Los Alisos Water Reclamation Plant in Lake Forest, California; the City of Lancaster Maintenance Yard; the City of Garden Grove Maintenance Yard; and other manufacturing facilities. Plan preparation involved a review of facility operations, the identification of potential pollution sources and non-storm water discharges, the development of storm water management controls, and the development of monitoring plans. SWPPP training was developed and provided.
- Prepared SWPPPs for Construction Activities for remediation at a major petroleum company bulk terminal site; for impacted soil stockpile management at a petroleum company oil field; for two separate residential developments in Montclair, California; for a residential development (from an oil field property) in Santa Fe Springs, California, and other construction sites. Plan preparation involved a review of facility operations, the identification of potential pollution sources and non-storm water discharges, the development of storm water management controls, and the development of monitoring

plans. SWPPP training was developed and provided.

Remedial Investigations/Phase II Investigations (Preliminary Environmental Assessments)

- Project Manager for remedial investigations and PEA reports conducted under the DTSC School Property Evaluation and Cleanup Division for numerous Los Angeles Unified School District (LAUSD) schools including (1) Olive Vista Middle School; (2) Roosevelt High School; Dorsey High School; (3) Humphreys Elementary School; (4) LAUSD South Region Middle School # 6 Site 2A; (5) LAUSD South Region Elementary School # 4 Site 1; (6) Albion Elementary School; (7) LAUSD Central Region Middle School # 7 Site 6; (8) LAUSD Valley Region Elementary School #10; (9) LAUSD Valley Region Elementary School # 12; (10) LAUSD South Region Elementary School # 7; (11) Miles Elementary School; and (12) Sierra Vista Elementary School. Because at each school site project there is a potential for future cost recovery action, all activities must be National Contingency Plan (NCP) compliant including compliance with requirements specified in 40 CFR Section 300.150 for worker health and safety; 40 CFR Section 300.160 documentation for cost recovery; 40 CFR Section 300.400 compliance with permitting and ARARs; 40 CFR Section 300.420 remedial site evaluation; and 40 CFR Section 300.430 remedial investigations.
- Project Manager for a remedial investigation and PEA report prepared under the DTSC Voluntary Cleanup Program for higher education campus on a former manufacturing facility property. The PEA is currently recommending remediation of TPH, VOCs and lead in soil; soil vapor mitigation and institutional controls. Because at there is a potential for future cost recovery action, all activities must be NCP compliant.
- Project Manager for a remedial investigation and PEA report prepared under the DTSC Voluntary Cleanup Program for a former wheel manufacturing facility property. A phased investigation was successfully negotiated with DTSC and Phase 4 of 4 phases of investigations was recently completed and submitted to DTSC with a request for no further action other than a Land Use Covenant (LUC) to maintain the commercial/ industrial use status for the property.
- Project Manager for a PEA prepared under the DTSC Voluntary Cleanup Program for an in-patient drug and alcohol treatment facility occupying a former oil field property. The PEA recommended remediation of arsenic in soil. Federal grants through EPA and state grants through the Brownfield program were successfully obtained due to the non-profit status of the facility owner. The facility is starting the implementation of a remediation plan prepared by and approved by the DTSC. Engineering plans to obtain landscaping, grading, repaving plans required by the City are currently under preparation.
- Project Manager for a PEA prepared under the DTSC Voluntary Cleanup Program for a machine shop in Los Angeles, California. The PEA was followed by remediation of lead in soil and Site closure.
- Project Manager for a PEA prepared under the DTSC Voluntary Cleanup Program for a former maintenance yard in Los Angeles, California. The PEA was followed by remediation of PCBs in soil and Site closure.

Feasibility Studies/Remedial Action Plans

- Project Manager for preparing Feasibility Study/Remedial Action Plans (FS/RAP) under the DTSC School Property Evaluation and Cleanup Division for numerous LAUSD schools including (1) Valley Region Elementary School #10; (2) LAUSD Valley Region Elementary School # 12; (3) LAUSD South Region Elementary School # 7; (4) LAUSD Albion Elementary School, and (5) LAUSD Latona Elementary School. Because at each school site project there is a potential for future cost recovery action, all activities must be NCP compliant including compliance with requirements specified in 40 CFR Section 300.430 FS and remedy selection.
- Project Engineer for the expedited site characterization of a 1600-acre oil field operating since the 1940s. The project involved investigating over 300 potential areas of concern using four sample collection crews simultaneously was completed in 8 months by using Rapid Optical Screening Tool (ROST) technology followed by conventional drilling and electronic data compiled and evaluated electronically through the use of an Access database and Global Positioning System coordinates for each sample. The overwhelming documentation of contamination of the property resulted in oil field operator agreeing to cleanup all 300 areas of concern.

Construction Management/Engineering/Remediation

- Project Manager for the remediation of the LAUSD proposed 15-acre school Site for South Region High School #12 in Los Angeles, California which included three city blocks formerly occupied by commercial and industrial businesses. Two Underground Storage Tanks (USTs) were removed and soil excavation was conducted in 18 areas with volatile organic compound, total petroleum hydrocarbon, and metals impacted soils classified as non-hazardous and California (non-RCRA) hazardous waste. A “no further action” letter was received from the DTSC upon completion. Because at each school site project there is a potential for future cost recovery action, all activities must be NCP compliant including compliance with requirements specified in 40 CFR Section 300.435 remedial action and operation and maintenance.
- Project Manager for the investigation, remedial action plan preparation, and remediation of the LAUSD proposed 5-acre school Site for South Region Elementary School #7 in Los Angeles, California which included twenty-four parcels occupied by a mix of commercial and residential properties. Investigations showed soil contaminated with lead and organochlorine pesticide (OCP) at 15 of the 24 parcels. A “no further action” letter was received from the DTSC upon completion. Because at each school site project there is a potential for future cost recovery action, all activities must be NCP compliant including compliance with requirements specified in 40 CFR Section 300.435 remedial action and operation and maintenance.
- Project Manager for the investigation, remedial action plan preparation, and remediation of the LAUSD proposed school Site for Valley Region Elementary School #10 in Canoga Park, California. The 3.5-acre Site was determined to contain soil impacted with arsenic, lead, and OCP. The soil removal action included the excavation and off-site disposal of approximately 7,639.2 tons of California hazardous waste and 75.2 tons of non-hazardous

waste. Upon successful completion of the remediation, a “no further action” letter was received from the DTSC. Because at each school site project there is a potential for future cost recovery action, all activities must be NCP compliant including compliance with requirements specified in 40 CFR Section 300.435 remedial action and operation and maintenance.

- Project Engineer for closure of a former bulk petroleum product tank farm for a major oil company in the Port of Los Angeles, California, under the oversight of the RWQCB, Los Angeles Region. Prepared and received agency approval of a feasibility study report on various treatment options for the petroleum impacted soil and groundwater. Prepared and received agency approval on a remedial action plan for the site. Managed the remediation which included installing watertight shoring across half of the Site to insure safe excavation to a depth of 15 feet below the groundwater table; excavation of over 30,000 tons of petroleum impacted soil; on-site and off-site thermal desorption of impacted soil; dewatering and treatment of water with regulatory agency approved discharge to the storm drain system.
- Project Manager for the design, permitting and construction oversight of a three-bay vehicle and equipment wash facility at the City of Lancaster Maintenance Yard.
- Project Manager for the investigation, remedial action plan preparation and remediation of impacted soil inside a retail tenant space in a strip mall in Riverside, California. Approximately 60 cubic yards (90 tons) of impacted soils were removed from inside two adjoining 20-foot by 60-foot suites using a compact excavator and conveyor system for soil removal. Upon successful remediation, a “no further action” letter was received from the Santa Ana RWQCB.
- Project Manager for the investigation, remedial action plan preparation and remediation of impacted soil at a former bulk oil storage facility in Carson, California. Approximately 560 cubic yards of TPH, VOC and arsenic impacted soils were removed from two areas. The soil removal in one area located along the property boundary required removal using a wide diameter auger. Wide diameter auger drilling was conducted to achieve removal of soils to a depth of 22-feet while avoiding the use of shoring or the need to slope the excavation sidewall at the property boundary. Upon successful remediation, a “no further action” letter was received from the Los Angeles RWQCB.
- Project Manager for the investigation, removal and closure of several projects involving UST removals. In each case agency oversight and closure was handled by the local Fire Department. Projects included the removal or in-place closure of approximately 2 UST removals in San Jose, California; 2 UST removals in San Diego, California; an in-place clarifier closure in Santa Fe Springs, California; a clarifier removal in Lancaster, California.

Agency Negotiation/Facility Closure

- Project Manager for the closure of a anodizing facility in Lynwood, California under the regulatory oversight of the Los Angeles County Fire Department (CUPA). Prepared closure workplan and managed the closure of the facility which included removal of solid and liquid hazardous materials and hazardous waste; decontamination, demolition,

removal and disposal of anodizing lines which involved 30 tanks. Prepared closure reports. Negotiations for closure are underway with the CUPA.

- Project Manager for the closure of a jet engine refurbishing facility in San Diego, California under the regulatory oversight of the San Diego County, Hazardous Materials Management Division (HMMD) and the Regional Water Quality Control Board (RWQCB), San Diego Region. Prepared closure workplans, site investigation workplans and soil remediation workplans. Managed the closure of the facility which included removal of solid and liquid hazardous materials inventory and hazardous waste; decontamination, demolition, removal and disposal of plating facilities, parts cleaning facilities, paint booths, welding booths; removal of five underground tanks; removal of an air ventilation system including three roof mounted air scrubbers; lead and asbestos abatement. Managed the soil investigation and soil remediation activities conducted to obtain regulatory closure including a basement excavation requiring limited access excavation equipment and hydraulic shoring. Prepared closure reports and negotiated closure with agencies to received regulatory approval/closure.
- Project Manager for the implementation of closure activities for a tier permitted (permit-by-rule) wastewater treatment system associated with plating operations at a printed circuit board manufacturing facility in Placentia, California. Prepared a report certifying clean closure and obtained approval of the clean closure from the Orange County Health Agency.
- Project Manager for the implementation of closure activities for a tier permitted (permit-by-rule) wastewater treatment system associated with a compact disc manufacturing facility in Anaheim, California. Prepared a report certifying clean closure and obtained approval of the clean closure from the City of Anaheim CUPA.
- Project Manager for soil investigations at a maintenance shop in Los Angeles, California. Managed the preparation of a risk assessment that showed elevated levels of lead in soil and conducted hot spot soil removal of impacted soil. After submittal of a site closure report to the DTSC under its Voluntary Cleanup Program, a 'No Further Action' decision was received for the facility.

Due Diligence and Phase I Environmental Assessments

- Project Manager for numerous environmental assessments for existing and proposed school sites; manufacturing facilities; retail properties; hotels; business center buildings; industrial facilities; and municipal properties in California, Nevada and Texas where environmental assessments were conducted in accordance with industry standards and the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments.