

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

Ms. Gonzalez is a Principal Engineer and Registered Professional Civil Engineer for Waterstone Environmental with over 35 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), Ms. Gonzalez managed State and Federal Superfund sites and was involved in the remedial investigation, feasibility study, and remedial action stages of the cleanup process. Ms. Gonzalez 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, Ms. Gonzalez has a sound understanding of environmental laws and regulations. Her unique background as an engineer with extensive knowledge of industrial operations along with a strong understanding of environmental laws and regulations has resulted in Ms. Gonzalez' expertise in regulatory compliance related to operating industries.

Ms. Gonzalez' has extensive experience managing projects to obtain regulatory closure on environmental issues and providing regulatory compliance services. Ms. Gonzalez has managed several projects from the investigation through the remediation phase and received "no further action" closure from various regulatory agencies. Ms. Gonzalez' 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.

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

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

Representative Project Experience Summary

Litigation Support

- 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 the L.A. Terminals, Inc. (Plaintiff) in the case (USDC 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 Department of Justice (DOJ) in their case against a chemical manufacturing facility in Utah. Facility chemical manufacturing operations, solvent recycling methodologies were evaluated and over 3,000 drums of material stored

at the facility were inventoried. It was 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. An Expert Report detailing noncompliance issues and a RCRA facility closure cost estimate was prepared. Using the information prepared by Waterstone, the DOJ obtained a court order that required operations to cease, \$100,000 in penalties for violations, and is entitled to collect up to \$900,000 for the Superfund removal action conducted by the EPA.

- Evaluation of the facilities wastewater treatment system and associate equipment, and review of regulator inspection findings. A detailed review of tank integrity assessment reports as well as summaries of tank redesign and retrofitting were used to establishing an opinion regarding the need for replacement and/or retrofitting of tanks and developed an equitable cost allocation methodology to apportion a regulatory imposed fines between the current facility owner and its predecessor. Assisted in the preparation of an affidavit summarizing opinions regarding the facilities historic and present-day operations, evaluation of the facilities wastewater treatment system and associate equipment, and evaluation of regulator and inspection findings. The information provided to legal counsel supported a successful settlement agreement between the current facility owner and its predecessor.
- 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.
- Determined remediation costs associated with proposed remediation activities at a former plating facility. Remediation included metals impacted soil extending to groundwater. Prepared an opinion letter used by legal counsel in sale of the property.
- Prepared a declaration in support of a property owner (plaintiff) seeking to recover costs for investigation and remediation of petroleum hydrocarbon impact to their property caused by a major oil company during the oil company's lease the property from 1986 to 2004. Provided deposition testimony to attorneys representing the oil company (defendant). The information provided to legal counsel supported a successful cost recovery settlement agreement between the property owner and the oil company.

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 1 of 4 phases of investigations was recently completed and submitted to DTSC.
- 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 is currently recommending remediation of arsenic in soil.
- 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 impacted 300 areas of concern.

- Project Engineer for the investigation, feasibility study and remedial action plan for strip mall in Las Vegas, Nevada with a dry-cleaning facility immediately adjacent to a residential area. Investigation results showed a PCE plume in soil and groundwater extending from the strip mall to the residential area. A feasibility study was conducted and using the results of a cost benefit analysis, the Nevada Department of Environmental Protection (NDEP) approved a remedial action plan which was limited to onsite removal of impacted soil and groundwater.

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 compounds, 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 submitting a site closure report to the Department of Toxic Substances Control under its Voluntary Cleanup Program, a ‘No Further Action’ decision was received for the facility.

Regulatory Compliance

- At a southern California solvent recycling facility permitted as RCRA TSD facility, prepared a Current Conditions Report, RCRA Facility Investigation Workplans and RCRA Facility Reports to comply with conditions of the RCRA permit issued by the DTSC.
- At a southern California steel manufacturing facility, under EPA oversight, conducted a risk-based remediation of polychlorinated biphenyls (PCBs) in accordance with Title 40 of the Code of Federal Regulations (40 CFR) Section 761.61 (c).
- 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 facility in developing corrective actions for 58 findings of non-compliance.
- 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.

- 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, Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasures plan, hazardous materials business plan, and hazard communication program; updated facility inventory and determined hazardous waste designations; developed numerous Standard Operating Procedures (SOP) for hazardous materials management and hazardous waste management; developed and provided training on SOPs; and coordinated with Cal-EPA 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.

Due Diligence and Phase I Environmental Assessments

- Project Manager for numerous environmental compliance audits for manufacturing facilities, commercial buildings, industrial facilities, and municipal properties.
- 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.