

PHASE I ENVIRONMENTAL SITE ASSESSMENT

15 SOUTH MAIN STREET
DUBUQUE, IOWA

FOR

SPAHN & ROSE, INC.



IIW, P.C. ♦ ENGINEERS. ARCHITECTS. SURVEYORS.

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PHASE I ENVIRONMENTAL ASSESSMENT REPORT

15 SOUTH MAIN STREET
DUBUQUE, IOWA

May 19, 2016

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IIW PROJECT NO: 16087

Report prepared by:


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5/23/2016
Date

	I hereby certify that this engineering document was prepared by me or under my direct personal supervision and that I am a duly licensed Professional Engineer under the laws of the State of Iowa.	
	FOR IIW, P.C.  Patrick R. Ready, P.E. License Number 15447 My license renewal date is December 31, 2017 Pages or sheets covered by this seal: Entire Report	<u>May 23, 2016</u> Date

Contents

EXECUTIVE SUMMARY	2
PURPOSE AND OBJECTIVES.....	2
METHODOLOGY.....	3
PROPERTY DESCRIPTION.....	3
CURRENT LAND USE.....	3
SITE FEATURES AND DESCRIPTION	3
PHYSICAL SETTING.....	4
PREVIOUS INVESTIGATIONS	4
SITE HISTORY AND DISCUSSION	4
ENVIRONMENTAL RECORD SEARCH.....	5
ONSITE INTERVIEW WITH OWNER/OCCUPANT	8
SITE OBSERVATIONS.....	9
FINDINGS	9
SUMMARY AND CONCLUSIONS	10
VAPOR ENCROACHMENT ASSESSMENT	11
ASSESSMENT LIMITATIONS	11
STATEMENT OF QUALIFICATIONS	12
DEFINITIONS	12

Appendices

APPENDIX A - Figures

APPENDIX B - Aerial Photo

APPENDIX C - Environmental Data Resources Report

APPENDIX D - Site Photographs

APPENDIX E - Previous Investigations

APPENDIX F - VEC Report

APPENDIX G - Qualifications

EXECUTIVE SUMMARY

Spahn & Rose Inc., retained the services of IIW, P.C. (IIW) to conduct a Phase I Environmental Site Assessment (ESA) for a commercial property located at 15 South Main Street, Dubuque, Dubuque County Iowa. The site is currently occupied by Selco Inc., a traffic control equipment rental company that supplies temporary traffic signs, barriers, and miscellaneous traffic control components for use on road construction projects or any project requiring temporary traffic control. The site consists of a single story building and a large outdoor storage area consisting of paved and granular surfaced areas.

IIW completed an ESA of the property in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E 1527-13 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process) and with the requirements of Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312).

This assessment has revealed evidence of the following current and controlled recognized environmental concerns (RECs) with respect to the site:

1. The property is a known former Leaking Underground Storage Tank (LUST) and Underground Storage Tank (UST) site.
2. Groundwater Hazard Statements for the parcels associated with the scrap metal processing facility state that there is a solid waste disposal site and hazardous waste on the property.
3. An abandoned Above Ground Storage Tank (AST) was observed on the adjoining IDOT owned parcel stored outdoors in an uncovered granular surfaced area.
4. Several contaminated sites in the general area and up gradient from the site have been identified in the Environmental Database Report. Migration of contamination from the surrounding area onto the subject site cannot be completely ruled out.

PURPOSE AND OBJECTIVES

The objective of a Phase I Environmental Site Assessment is to identify, to the extent feasible, recognized environmental conditions in connection with the property. The term recognized environmental conditions means the presence or likely presence of any hazardous substance or petroleum product in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include *de minimus* conditions that generally do not present a materials risk of harm to public health or the environment and that generally would not be subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The purpose of the vapor encroachment screening process is to identify the presence or likely presence of chemical vapors of concern in the subsurface of the subject property caused by the release of vapors from contaminated soil or groundwater either on or near the subject property.

An additional objective of this assessment is to satisfy the requirements for "all appropriate inquiries" in order for the owner to qualify for one of the Landowner Liability Protections (LLP) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); these protections include the bona fide prospective purchaser liability protection, contiguous property owner liability protection, and innocent landowner defense from CERCLA liability.

METHODOLOGY

The scope of services was, in general, completed in accordance with the American Society of Testing and Materials (ASTM) standard guidelines for Phase I Environmental Site Assessments, E-1527-13. No intentional deviations from the ASTM Practice E 1527-13 were made in the completion of this Phase I ESA for the site. No other warranty is made or intended.

PROPERTY DESCRIPTION

The subject property is part of the overall property located at 15 South Main Street in the City of Dubuque and is currently occupied by Selco Inc. The site, located in the SE 1/4 of the NE 1/4 of the SE 1/4 of Section 25 of Township 89 North, Range 2 East is identified on the exhibits in Appendix A.

According to the Dubuque County Assessor's website the subject property is comprised of the following parcels:

Parcel Number

1025433002
1025433003
1025433007
1025433009
1025433010

The overall property also includes four additional adjoining parcels, listed below, that are not included in the potential commercial real estate transaction. The current owner of Selco Inc. leases the four parcels listed below from the IDOT and the Crescent Realty Corporation.

Parcel Number

1025433005
1025433006
1025433008
1025433011

The area of the subject property is approximately 2.1 acres. Selco Inc. operates on an overall property area of 3.1 acres including adjacent land.

CURRENT LAND USE

The subject property is currently occupied by Selco Inc., a traffic control equipment rental company that supplies temporary traffic signs, barriers, and miscellaneous traffic control components for use on road construction projects or any project requiring temporary traffic control.

The current land classification according to the City of Dubuque's Zoning Map is LI – Light Industrial.

SITE FEATURES AND DESCRIPTION

The current site consists of an approximately 12,000 SF single story building with a slab on grade foundation. The areas within the building include an office area, bathrooms, kitchenette/break area, garage and storage areas. The building is surrounded on the north, south and west sides by an outdoor storage and parking area consisting of approximately 15,000 SF of asphalt paving and 13,000 SF of concrete paving and 89,000 SF of granular surfaced area. The entire site is surrounded by a 6 foot high chain linked fence.

Topographically, the entire site is generally flat and slightly sloped to the southeast. The southern portion of the property is rutted in several areas in the granular surfaced area where standing water was observed during site reconnaissance. According to historical weather observations the area had received 0.39 inches of rain within 24-hours of the site reconnaissance on May 4, 2016, and 1.42 inches of rain within the previous 7 days.

The site is provided with electricity from Alliant Energy, natural gas by Black Hills Energy, water and sanitary sewer service by the City of Dubuque.

PHYSICAL SETTING

This site is located at 15 South Main Street in Dubuque, Iowa. Soil information for this area indicates that urban land complex soils dominate and taxonomically occur as psamments. These soils can contain silt, sand, and gravels that are depositional remnants of prior channel and bench deposition from the Mississippi River over time. These soil types exhibit rapid infiltration and rapid hydraulic conductivity. The site occurs in a lowland area in the former floodplain of the Mississippi River. Dolomites/ Limestones occur in bluff positions to the west. The topographic height of the bluffs suggest the Mississippi channel has been incised over 200 feet in this area.

PREVIOUS INVESTIGATIONS

Records related to the Leaking Underground Storage Tank Incident 8LTU16 were requested from the Iowa Department of Natural Resources and reviewed as part of this assessment. The documents received from the IDNR LUST Records included the following:

- Behr Hardware Site Assessment, IIW Engineers & Surveyors, P.C. dated 7/20/92
- IDNR LUST Site Cleanup Report (SCR) dated 8/13/93
- IDNR issued No Further Action Letter dated 8/17/94
- IDNR issued Certificate of Completion for LUST Remediation dated 11/28/94

IIW contacted the Iowa Department of Transportation for the purpose of conducting an interview related to this assessment. The IDOT representative did not have personal knowledge of the site but was able to locate a Phase II Environmental Site Assessment conducted for a portion of the property by HR Green in 2003 which was provided to IIW and reviewed for this assessment.

The documents listed above are included in Appendix E.

SITE HISTORY AND DISCUSSION

Historical plats and abstracts indicate that the site existed in a backwater slough prior to industrial development of the surrounding properties which occurred around 1900. Several historic photos are included in Appendix C. Records also indicate that the site was split into multiple lots with an alley located in the middle of the site parallel to South Main and Salina Streets.

The west half of the site located between Salina Street and the alley was historically occupied and actively used as a scrap metal storage processing facility from at least 1946 until 2010 and was sold to the current owner of Selco Inc. in 2011.

City directories reviewed for this assessment indicate that JJ Behr Implement Co. owned the east half of the site from at least 1947 until 1995. JJ Behr Implement Co., who later changed their business name to Behr Farm & City Distributing Company and Behr Hardware, was a farm, home, and industrial supply company selling, among other things, fertilizers and pesticides. According to an interview with Irwin Behr in 1992 documented in the Behr Hardware

Site Assessment by IIW Engineers & Surveyors, P.C., the fertilizers and pesticides were sold only in bagged quantities and were not stored in bulk quantities on site.

Iowa Department of Natural Resources Leaking Underground Storage Site records indicate the removal of a 2,000 gallon fuel oil leaking underground storage tank in 1992 on the property. An initial site assessment was completed in 1992 after the tank was removed followed by site monitoring confirmed the release of petroleum. The IDNR issued a Certificate of Completion and No Further Action letter in 1994 for the site to Joseph J. Behr for removal and remediation of the LUST. The records for LUST Site 8LTU16 obtained from the IDNR are included as Appendix E. The 1993 LUST Site Cleanup Report (SCR) states that one 2,000 gallon and one 500 gallon UST were installed at the JJ Behr Implement Co. in 1947. The SCR also states that the 500 gallon UST was removed in 07/1990 and no contamination was detected above IDNR corrective action levels at the time of the removal. The IDNR issued a No Further Action letter for the site related to the 500 gallon UST in 10/1990.

The Iowa Department of Transportation purchased portions of the property during planning phases for the construction of the U.S. HWY 20 bridge over the Mississippi River in 2004 and later sold some of the purchased property to the current owner in 2012.

The IDOT retained the services of Howard R. Green in 2003 to conduct a Phase II Environmental Site Assessment for Parcel Number 1025433004 of the Selco Inc. property prior to acquiring the property. The Phase II ESA is included as Appendix E. The findings of the Phase II ESA identified contamination on site at concentrations below the statewide standards with the exception of arsenic and MTBE. The concentrations of arsenic in the soil samples analyzed, while above the statewide standard, was below the background concentrations of arsenic in the area soils. The concentrations of MTBE identified on site were found to be above the statewide standard but below the unprotected groundwater standard. The report indicated that the source of the MTBE may be from a release from a site in the surrounding area. The recommendation of the ESA indicated that the elevated concentrations of arsenic and MTBE found in the soil and groundwater on the site were not likely to require corrective action.

The Selco property is bound to the north by Dodge Street and the Highway 20 overpass, and to the south by Charter Street, and to the east by South Main Street, and to the West by Salina Street. Surrounding properties include ABC Supply Co. Warehouse to the east on South Main Street, Crescent Electric Supply Company to the south on Charter Street, Spahn & Rose Lumber Company and a vacant lot to the west on Salina Street.

There are several underground storage tanks in the vicinity of the lot. Please refer to the EDR report (Appendix C) for information regarding the exact number, sizes and contents of any buried fuel tanks for specific information.

Historic aerial photographs of the site are provided in Appendix C. These photos show the general land use and surrounding structures. A topographic map has been included for reference in Appendix C. The 1970 Sanborn map (Appendix C) of the site show two buildings, one labeled Iron Storage and one labeled Agricultural Implement Supplies & Service, one shed, and outdoor areas identified as Iron Storage and Junk Yard.

ENVIRONMENTAL RECORD SEARCH

The environmental record search was conducted by a contract search firm. The following is a partial list of the regulatory agency databases that were searched for this report:

1. USEPA Facility Index System (FINDS) - This database is an inventory of facilities regulated by the USEPA;
2. USEPA Resource Conservation and Recovery Information System (RCRIS) - This database tracks the status of registrations, permits, reports, inspections, enforcement activities, and financial data of those regulated under the Resource Conservation and Recovery Act (RCRA);

3. USEPA Comprehensive Environmental Response Compensation and Liability Act Information System (CERCLIS) - This database tracks sites that have come to USEPA's attention as having the potential for releasing or which have released hazardous substances into the environment;
4. USEPA Emergency Response Notification System (ERNS) - This database contains information on releases of oil and hazardous substances. Releases are recorded in ERNS when they are initially reported to the federal government by any party;
5. USEPA Toxic Release Inventory (TRIS) - This database is an inventory of facilities which emit toxic chemicals into the community;
6. Iowa Leaking Underground Storage Tank (LUST) List- This database lists identified leaking underground storage tank sites within the State of Iowa;

The subject property is listed on some of the regulatory agency databases searched for this report. It should be noted that environmental regulatory agencies have only been in existence since the 1970's. Underground storage tank sites have only been regulated since the late 1980's. Facilities that ceased operation prior to the existence of regulations would not be expected to be included on the above listed databases.

The property contains no features that require regulation by state or federal environmental agencies. Federal and state databases were searched for listed sites within a one-half mile radius of the site. These maps can be found in the EDR report (Appendix C).

There are seventeen (17) leaking underground storage tank sites located within a one-half mile radius. The registered underground storage tank sites are as follows:

Equal/Higher Elevation

<u>Site</u>	<u>Address</u>	<u>Direction/Distance</u>
<i>Earthgrains Baking C</i> Facility id: 3290 Facility id: 6391	<i>25 Main St</i>	<i>NNW 0 - 1/8 (0.051 mi.)</i>
<i>Amoco at the Bridge</i> Leak status: unknown Facility id: 2251	<i>351 Dodge St</i>	<i>WNW 0 - 1/8 (0.115 mi.)</i>
<i>Richard D Van Gordon</i> Leak status: stopped Facility id: 151	<i>198 S Locust</i>	<i>WSW 1/8 - 1/4 (0.139 mi.)</i>
<i>Former service station</i> Leak status: unknown Facility id: 5699	<i>200 S Locust</i>	<i>WSW 1/8 - 1/4 (0.140 mi.)</i>
<i>Martin Oil</i> Facility id: 874	<i>280 W Locust St</i>	<i>SSW 1/8 - 1/4 (0.176 mi.)</i>
<i>Hy-Vee Gas #3</i> Leak status: unknown Facility id: 4692	<i>300 S Locust</i>	<i>SSW 1/8 - 1/4 (0.199 mi.)</i>
<i>Former gas station</i> Leak status: stopped Facility id: 393	<i>105 Locust St</i>	<i>NNW 1/8 - 1/4 (0.202 mi.)</i>
<i>Pixler Electric/Form</i> Leak status: unknown Facility id: 2736	<i>605 Dodge St</i>	<i>WNW 1/8 - 1/4 (0.210 mi.)</i>

Dodge House Leak Status: Unknown Facility Id: 426	703 Dodge Street	W 1/4 - 1/2 (0.288 mi.)
Miracle Sinclair Leak Status: Continuing Facility Id: 2440	285 Locust	NNW 1/4 - 1/2 (0.316 mi.)
Best Rental Leak Status: Stopped Facility Id: 5166	301 Central Ave	N 1/4 - 1/2 (0.419 mi.)
Three Rivers FS Co Leak Status: Stopped Facility Id: 813	305 Central Ave	N 1/4 - 1/2 (0.420 mi.)
DK Auto Facility Id: 4134	500 Locust St	NNW 1/4 - 1/2 (0.450 mi.)
Bill Miller Logging Leak Status: Stopped Facility Id: 5202	380 East 4th Street	N 1/4 - 1/2 (0.461 mi.)

Lower Elevation

<u>Site</u>	<u>Address</u>	<u>Direction/Distance</u>
Mulgrew Oil Co Leak Status: Unknown Facility Id: 2245	85 Terminal St	ENE 1/8 - 1/4 (0.165 mi.)
Former Katuin Brothers Leak Status: Stopped Facility Id: 4077	40 Terminal St	ENE 1/8 - 1/4 (0.185 mi.)
Inland Molasses Leak Status: Stopped Facility Id: 1082	5 Jones Street	NE 1/8 - 1/4 (0.188 mi.)

All are located in Dubuque, Iowa

Three sites were listed on the Local Brownfields database. Brownfields are abandoned idle or underused commercial or industrial properties where the expansion or redevelopment is hindered by real or perceived contamination. These sites are at a lower elevation:

<u>Facility</u>	<u>Address</u>	<u>Direction</u>
Sitco Property	102 Terminal St.	NE 0.249 mi.
Dubuque River Terminal	60 Jones St.	NNE 0.314 mi.
Dodds River Terminal	20 Terminal St.	NE 0.322 mi.

One (1) site was listed on the RCRA-NonGen database within 0.25 mi. of the site. RCRA is defined as the Resource Conservation and Recovery Act. This is a comprehensive list providing information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the RCRA Act. Non-Generators do not presently generate hazardous waste.

Equal/Higher Elevation

<u>Site</u>	<u>Address</u>	<u>Direction/Distance</u>
Anderson & Weber, Inc.	245 Railroad Ave.	S 0.130 mi.

All located within the City of Dubuque, Iowa

ONSITE INTERVIEW WITH OWNER/OCCUPANT

The current owner and occupant of the site, Mr. Wolff, was interviewed in person by IIW personnel on May 4, 2016, during the site reconnaissance. Mr. Wolff stated that he had been on the property for around 20 years now and indicated that portions of the property were purchased from him by the IDOT and subsequently sold back to Mr. Wolff by the IDOT with the last transaction occurring sometime around 2011. At this time Mr. Wolff still leases the two parcels on the north side of the property from the IDOT and he leases the parcel located in the southeast corner of the property from Crescent Electric. Mr. Wolff indicated that the only property that would be included in the proposed commercial real estate transaction is the property that he currently owns and would not include the leased parcels.

Mr. Wolff thought the existing building was constructed sometime around 1940 and is slated for demolition in the near future.

Mr. Wolff stated that he was aware of the removal of an underground storage tank somewhere around the northwest part of the property. He indicated that contamination was found when the tank was removed and that documentation of the tank removal and contamination was provided to Spahn & Rose. Mr. Wolff indicated that the tank was installed by the previous owner JJ Behr Hardware. Mr. Wolff indicated that an environmental site assessment, either a phase I or II, had been conducted for the property sometime around 1995 and concluded the site was "clean". Mr. Wolff did not think that he still had a copy of that report. Mr. Wolff was not aware of the presence, past or current, of any other underground storage tanks on the site.

Mr. Wolff did indicate that an empty above ground storage tank was stored on the property which was observed near the northwest corner of the property against the fence on the west side of the property. Mr. Wolff stated that the tank had never been in use on this property, but was previously used at the Selco site located in Davenport, Iowa, and was moved to the Dubuque location after the tank was empty for storage. The portions of the tank that could be readily observed appeared to be intact and in relatively good condition with some rust but no major observable defects or damage. A faded label indicated that the tank contained diesel fuel on road low sulfur. The dispensing hose and nozzle were still connected to the top of the tank and appeared to be in good condition. The tank is located outside, uncovered and stored on the granular surfaced area. No staining was visible on the ground in the vicinity of the tank, however the tank could not be observed from all sides due to large traffic signs stacked near the tank and a large stack of metal posts.

Mr. Wolff stated that he stores large quantities of IDOT specified waterborne road paint on the site in 55 gallon drums. Several pallets of 55 gallon drums and individual 55 gallon drums of the waterborne road paint were observed in various locations on the site. The majority of 55 gallon drums appeared to be new, completely intact and clearly labeled to identify the contents. A few 55 gallon drums were observed on site that were being used as trash cans in and around the building. Approximately six (6) 55 gallon drums, in various states of deterioration, were observed in the storage area on the south portion of the property. The drums that were readily accessible appeared to be empty, and no visible staining was observed on the ground in the vicinity of the drums.

Mr. Wolff stated that the painting equipment was tested out on the asphalt paved area on the south side of the building where a large area of paint stripes was observed. Mr. Wolff stated that the only type of road paint ever stored on the site was the waterborne type.

Mr. Wolff stated that all vehicle maintenance occurs off site and no vehicle maintenance occurs in the garages or anywhere on site. Mr. Wolff indicated that he believed that the previous owner, JJ Behr Implement, conducted vehicle and/or equipment maintenance as a service.

When asked if he had knowledge of anything else that could be of environmental significance with respect to the site or general surrounding area, Mr. Wolff stated that there was once a “dump” located on the site on the south side of the property.

SITE OBSERVATIONS

In addition to the observations stated in the previous section, the following observations were made by IIW personnel during the site reconnaissance on May 4, 2016. Photos taken during the site visit are included in Appendix D.

The garage area consists of three bays, a large center bay where trucks are loaded and unloaded, and two smaller bays on either side. The concrete floors in the garage and storage areas inside the building were observed to be in good condition with few cracks. The floor drains in these areas are connected to the sanitary sewer but were all observed to be permanently capped.

The west garage bay is used primarily for storage of equipment which included: road painting equipment, air compressors, pressure washers, a small tractor, and other various small miscellaneous equipment. Small portable gasoline containers used to operate the equipment are stored in the same general area with the equipment. Small containers of miscellaneous chemicals and 5-gallon LP tanks are also stored on shelves in the same area. Minor paint staining was observed on the concrete floor in the general vicinity of the painting equipment. No floor drain was observed in this area. Several 55-gallon drums of waterborne road paint area stored separately in the west garage bay which is where the open and actively in use paint drums are kept.

The east garage bay is used for storage of signs and sign components. There are several work areas where maintenance is performed on signs. Large quantities of size D alkaline batteries are stored in this area, which are used to power the orange blinking lights used on traffic signs. The roof was observed to be leaking in two places inside the east bay creating small puddles on the floor.

The outside storage area was used to store vehicles, larger signs and traffic control equipment. Several areas outside could not be visually observed where components were stacked in large quantities covering large areas of ground including a large area near the center of the property on the south side of the building where a large quantity of concrete barriers are stacked.

Standing water was observed within ruts in the gravel surface on the south side of the property. The area is relatively flat and the ruts and uneven grading would appear to prevent storm water runoff. Two storm drains were observed outside in the paved areas; no staining was observed in or around the drains.

Historical aerials indicate that portable toilets used to be stored at this location in large quantities, however, none were observed during the site visit.

FINDINGS

IIW has completed the Phase I ESA for the site in general conformance with the scope and limitations of ASTM Practice E1527-13 (Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process) of 15 South Main Street located in Dubuque, Iowa. Any intentional exceptions to, or deletions from this practice are noted in the report. Based on the information reviewed for this assessment IIW has identified the following RECs, controlled RECs, and de minimis conditions in connection with the site.

RECs:

- Several contaminated sites in the general area and up gradient from the site have been identified in the Environmental Database Report. Migration of contamination from the surrounding area onto the subject site cannot be completely ruled out.

- An abandoned Above Ground Storage Tank (AST) was observed on the adjoining IDOT owned parcel stored outdoors in an uncovered granular surfaced area. However, the tank appeared to be intact and generally in good condition. If documentation, verifying that the tank was properly abandoned, can be produced this would be considered a de minimus condition.

Controlled RECs:

- The property is a known former Leaking Underground Storage Tank (LUST) and Underground Storage Tank (UST) site.
- Groundwater Hazard Statements for the parcels associated with the scrap metal processing facility state that there is a solid waste disposal site and hazardous waste on the property. The Groundwater Hazard Statement indicates that no notice from the IDNR has been received that deems the site to be potentially hazardous due to the solid waste disposal site. The statement further indicates that the hazardous waste that is present on the property is being managed in accordance with IDNR rules.

De minimus conditions:

De Minimis conditions observed during the site reconnaissance included deteriorated 55-gallon drums with no or illegible labels which appeared to be empty, small containers of gasoline and various maintenance fluids stored inside the garage area, storage of large quantities of waterborne road paint, and use of paint on asphalt paved area for equipment testing, few small containers of petroleum based paint observed in the outdoor storage area, vehicles and equipment stored outside on granular surfaced areas.

SUMMARY AND CONCLUSIONS

Based on a review of all available information this assessment has identified the presence of RECs, Controlled RECs, and de minimus conditions associated with the site.

The previous investigations made available and reviewed for this assessment were primarily to characterize the site contamination with respect the LUST incident. The maps provided in the documents indicate that the subsurface investigations were conducted on the IDOT and JJ Behr Implement parcels and did not include the parcels associated with the scrap metal processing facility. While no level of site assessment can completely characterize a site or eliminate uncertainty, it is unlikely that additional investigation of the IDOT and JJ Behr Implement parcels would result in additional findings of any significance.

The historical records indicate that the parcels associated with the scrap metal processing facility have been used as such since at least 1946 through 2010. Properties associated with this type of land use are notorious for having some level of contamination. Given the duration of use since at least 1946 it is likely that, at a minimum, the soils beneath the site would contain elevated levels of metals leached from the scrap metals, stored directly on the ground surface and exposed to precipitation to the soils. Generally, and depending on the soil properties and other contaminants present, metals tend to remain bound to the soil and are not very mobile.

Visual inspection of the parcels associated with the scrap metal processing facility did not reveal areas of obvious indications of the presence or likely presence of contamination in the visually observed surface. The historical documents did not reveal additional information of potential environmental significance regarding the scrap metal processing facility other than its existence. Given the limited level of detail regarding the parcels associated with the scrap metal processing facility revealed by this assessment, additional investigation to include subsurface characterization would be appropriate.

VAPOR ENCROACHMENT ASSESSMENT

The vapor encroachment assessment is to determine whether a vapor encroachment condition exists, is likely to exist, or cannot be ruled out or can be ruled out because it does not exist or is unlikely to exist.

The Tier 1 Vapor Encroachment Assessment process is designed as a screening tool and does not involve soil or groundwater vapor testing. It is based on the establishment of an area of concern around the site for volatile/semi-volatile hazardous substances and petroleum hydrocarbon base chemicals of concern. A Tier 2 Vapor Encroachment Assessment process determines the presence of vapor conditions on the property due to COC (chemicals of concern) through an invasive or non-invasive testing process.

Non-Scope Considerations:

The vapor encroachment assessment at both the Tier 1 and Tier 2 level does not consider the following:

- a) Indoor Air-quality
- b) Explosion Hazard Assessment
- c) Naturally Occurring Gases associated with certain types of subsurface geology
- d) Vapor Intrusion Assessment
- e) Vapor Intrusion Mitigation
- f) Health Threat notification or communication
- g) Vapor migration onto any other property other than the subject property

The hydraulic gradient is assumed to be from NW to SE or West to East toward the Mississippi River.

The report of the vapor encroachment screening is presented as Appendix F.

ASSESSMENT LIMITATIONS

There may be environmental issues or conditions relevant to a particular property or property transactions that are outside the scope of assessment prescribed by ASTM E-1527-13 (non-scope considerations). Typical non-scope considerations include, but are not limited to, evaluation of asbestos, radon, lead based paint, lead in drinking water, toxic molds, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, and high voltage power lines. Unless otherwise noted in the Scope of Service section, non-scope considerations are not included in this assessment.

The findings and conclusions presented in this report are based on the procedures described in the ASTM Practice E 1527-13, informal discussions with various agencies, available literature cited in this report, conditions noted at the time of our Phase I ESA, and our interpretation of the information obtained as part of this Phase I ESA. Our findings and conclusions are limited to the specific project and properties described in this report and by the accuracy and completeness of the information provided by others.

An environmental site assessment cannot wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property within reasonable limits of time and cost.

This report offers no certification, warranty or guarantee of the truthfulness, validity, accuracy or completeness of governmental or regulatory records or databases, database search services, information provided by others, or observations made in connection with this assessment. Similarly, this report offers no certification, warranty or guarantee regarding the presence or absence of recognized environmental conditions, whether or not recognized environmental conditions are identified in this report.

No intentional deviations from the ASTM Practice E 1527-13 were made in the completion of this Phase I ESA for the site. No other warranty is made or intended.

STATEMENT OF QUALIFICATIONS

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312

DEFINITIONS

The following definitions are from ASTM E1527-13:

Controlled Recognized Environmental Condition: A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

De Minimis Condition: A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not recognized environmental conditions or controlled recognized environmental conditions.

Historical Recognized Environmental Condition: A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

Material Threat: A physically observable or obvious threat which is reasonably likely to lead to a release that, in the opinion of the environmental professional, is threatening and might result in impacts to public health or the environment.

Recognized Environmental Condition (REC): the presence or likely presence of any hazardous substance or petroleum product in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

Adjoining properties means: any real property or properties the border of which is (are) shared in part or in whole with that of the subject property, or that would be shared in part or in whole with that of the subject property but for a street, road, or other public thoroughfare separating the properties.

Data gap means: a lack of or inability to obtain information required by the standards and practices listed in subpart C of this part despite good faith efforts by the environmental professional or persons identified under §312.1(b), as appropriate, to gather such information pursuant to §§312.20(e)(1) and 312.20(e)(2).