



Phase I Environmental Site Assessment

and

October 4, 2023

23329-99

NATIONAL PRESENCE.
LOCAL KNOWLEDGE.

Moran Construction Consultants
866.545.3350 - www.morancc.com

Package Summary Item

██████████
 ██████████, and ██████████
 ██████████
 Assessor's Parcel Number(s): ██████████

Site Size: 9.729 acres
 Property Type: Multi-family Apartments
 Building Size: +/- 317,786

Report Section		Acceptable	REC	HREC	CREC	De Minimis	BER	Notes
3.0	<u>User-Provided Information</u>	✓						
4.1	<u>Subject Property Database Records of Concern</u>	✓						
4.2	<u>Adjacent Properties Database Records of Concern</u>		✓					Adjacent Chevron gasoline station, located at ██████████, identified as a REC.
4.3	<u>Additional Environmental Records Sources</u>	✓						
4.4	<u>Vapor Migration</u>	✓						
5.2	<u>Past Uses of Subject Property</u>	✓						
5.3	<u>Past Uses of Adjoining Properties</u>	✓						
5.4	<u>Past Uses of Surrounding Properties</u>	✓						
6.1.1	<u>Hazardous Substances and Petroleum Products (Identified Uses)</u>	✓						
6.1.2	<u>Underground Storage Tanks (USTs)</u>		✓					Refer to Section 4.2. for additional information.
6.1.3	<u>Odors</u>						✓	Refer to Section 8.4 for additional information.
6.1.4	<u>Hazardous Substances and Petroleum Products (Not Identified Uses)</u>	✓						

Report Section		Acceptable	REC	HREC	CREC	De Minimis	BER	Notes
6.1.5	<u>Transformers or PCB-Containing Equipment/Items</u>		✓					Concrete staining and distressed vegetation was identified around one transformer in-between Buildings 14 and 16 and is identified as a REC.
6.1.6	<u>Drains and Sumps</u>	✓						
6.1.7	<u>Stressed Vegetation, Stained Soil, or Stained Pavement</u>		✓					Refer to Section 6.1.5 for additional information.
6.1.8	<u>Solid Waste and Water/Wastewater Discharge</u>	✓						
7.0	<u>Interviews</u>	✓						
8.1	<u>Asbestos-Containing Materials (ACMs)</u>						✓	Business Environmental Risk (BER) was identified with the potential for the presence of Asbestos Containing Materials (ACMs).
8.2	<u>Lead-Based Paint (LBP)</u>						✓	Business Environmental Risk (BER) was identified with the potential for the presence of Lead-Based Paint (LBP).
8.3	<u>Lead In Drinking Water (LIW)</u>						✓	Business Environmental Risk (BER) was identified with the potential for the presence of Lead in Drinking Water (LIW).
8.4	<u>Microbial Growth</u>						✓	Business Environmental Risk (BER) was identified with the presence of Microbial Growth.
8.5	<u>Radon</u>	✓						
8.6	<u>Emerging Contaminants</u>	✓						

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EXECUTIVE SUMMARY

Moran Construction Consultants completed this Phase I Environmental Site Assessment (ESA) for the property located at [REDACTED], [REDACTED], and [REDACTED] (the Subject Property). This Phase I ESA is performed in accordance with the scope of work and limitations of ASTM Standard Practice E1527-21, the Environmental Protection Agency Standards, and Practices for All Appropriate Inquiries (AAI) (40 CFR Part 312). This report is intended for the sole use of [REDACTED] (the User).

The Subject Property is located northwest of [REDACTED] and [REDACTED] and west of [REDACTED]. While the address of the property is listed as [REDACTED], [REDACTED] is located to the west of the property with no vehicular access present. Instead, access to the property is only provided by [REDACTED].

The Subject Property is currently utilized as multi-family housing and is situated in a suburban area characterized by residential and commercial development. It consists of a +/- 9.73 acre parcel of land, improved with 25 one to three-story buildings that were constructed on-site in 1973; totaling +/- 317,786 gross building square feet (GSF). The on-site buildings consist of 19 two to three-story apartment buildings, three community laundry buildings, one leasing office, one guard shack, and one small maintenance shed. Additional on-site amenities include a swimming pool and a community playground. The Subject Property consists of 263 total residential units. Of the 263 units, there are 40 one bedroom/one bathroom units, 154 two bedroom/one and a half bathroom units, and 39 two bedroom/two bathroom units, and 30 three bedroom/two bathroom units.

An attempt was made to observe 100% of the residential units in addition to all common areas, building exteriors, systems, property grounds, etc. Approximately 90%-95% of the residential units were observed, and the remaining 5%-10% of the units were not accessible due to key availability, violent animals, and a resident diagnosed with Covid 19.

The physical condition of the Subject Property was observed to be fair to poor, as areas of deterioration and deferred maintenance were observed throughout. Observed conditions include, but are not limited to, water intrusion throughout many of the units, widespread apparent microbial growth, and down units in need of extensive repair.

According to available historical sources, prior to the construction of the current on-site multi-family housing structures in 1973, the Subject Property appeared to be vacant, undeveloped land from at least 1946-1952, and cleared, vacant land from at least 1965-1972.

The assessment of the topographic gradient infers that groundwater flow predominantly moves towards the south-south-east direction. It is essential to note that in areas like [REDACTED], where gradients are low and complex hydrogeological conditions exist, groundwater flow patterns are known to exhibit variability.

1.1 - Findings and Opinions

In accordance with ASTM E1527-21, the purpose of this assessment was to identify if there are recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), historical recognized environmental conditions (HRECs), de minimis conditions, or significant data gaps (each of which are defined

in Section 9.2) in connection with the subject property. Based upon the site reconnaissance, and a review of historical records and regulatory environmental databases (state and federal), MCC offers the following findings and opinions:

1.1.1 Recognized Environmental Conditions (RECs)

The following recognized environmental conditions (RECs) were identified:

Records Review - Adjacent Property

The adjoining Chevron facility to the east poses a recognized environmental condition (REC) to the Subject Property based on historical releases, residual contamination, and a history of violations. However, the facility has undergone remediation to rectify the situation, and per the [REDACTED] ([REDACTED]), has affectively addressed the releases and violations. MCC recommends an annual monitoring of records over time, particularly in consideration of historical concerns, the age of the tanks, existing residual contamination, and a significant track record of past violations associated with the adjoining facility. At this juncture, no further actions are deemed necessary. This monitoring aligns and serves as a precautionary measure given the historical violations and incidents of tank releases associated with the adjoining property and their operational practices.

Site Reconnaissance - Transformers

The Subject Property has underground electrical service with pad-mounted transformers owned by [REDACTED], a public utility provider. There was observed apparent leakage from one transformer between Buildings 14 and 16, as evidenced by stained concrete and distressed vegetation around the transformer. This transformer potentially contains PCBs due to its age, as the property was built in 1973. While one transformer had a 2016 manufacturer date, no dates were found on the smaller, older-looking transformers. [REDACTED] could not confirm if the smaller transformers contain PCBs. Since the absence of PCBs within the transformer could not be confirmed, it represents a Recognized Environmental Condition (REC). MCC recommends the identified release of dielectric fluid be reported to [REDACTED] and that [REDACTED] determine the manufacturing date and conduct appropriate response actions to remove the impacted concrete pad and any underlying impacted soil. If PCBs are present, MCC additionally recommends that post-excavation confirmatory soil samples be collected and analyzed for the presence of total petroleum hydrocarbons (TPH) and polychlorinated biphenyls (PCBs). Periodic inspections of other units for leakage are recommended. No other equipment using dielectric or hydraulic fluid was found during the site assessment.

No other RECs were identified in connection with the Subject Property.

1.1.2 Conditional Recognized Environmental Conditions (CRECs)

No controlled recognized environmental conditions (CRECs) were identified in connection with the Subject Property.

1.1.3 Historical Recognized Environmental Conditions (HRECs)

This assessment did not identify any historical recognized environmental conditions (HRECs) in connection with the Subject Property.

1.1.4 De Minimis Conditions

This assessment did not identify any de minimis conditions in connection with the Subject Property.

1.1.5 Business Environmental Risks (BERs)

The following business environmental risks (BERs) were identified:

Asbestos-Containing Materials (ACMs)

Based on the age of the Subject Property, the potential for the presence of ACMs exists. MCC conducted a limited screening survey for the presence of ACM at the Subject Property. MCC collected 12 bulk samples of suspect materials. The samples taken were located in the leasing office and Unit 263. The results indicated that asbestos was not detected in the sampled materials. Previous hurricanes and other forms of water intrusion were reported and observed where interior drywall replacement has been necessary on all floors. With the uncertainty of which the drywall was replaced, if at all, an extensive Asbestos Survey may reveal different results. Please note that the scope of work for this survey was limited to a sample of friable materials or damaged non-friable materials in a few accessible areas and that destructive sampling of undamaged non-friable materials was not conducted.

It should be noted that the limited visual screening survey conducted under the scope of work for the assessment does not constitute a full asbestos inspection, in which all areas of the buildings would have been thoroughly surveyed and sampled. The possibility exists for ACM to be present in areas not accessed or sampled by MCC personnel. Based on the limited scope of work of this assessment, additional suspect ACM may also be present in areas of the buildings that were accessed as part of this assessment.

MCC recommends comprehensive testing and removal of damaged asbestos following state and local regulations. Additionally, MCC recommends that an asbestos inspection be performed in accordance with all applicable federal, state, and local regulatory requirements prior to renovation, demolition, or other activities that could cause a material disturbance. Any removal or disturbance of ACM or suspect ACM should be performed by properly trained personnel and in compliance with federal, state, and local regulations. MCC further recommends the implementation of an Asbestos Operations and Maintenance (O&M) Program. This O&M Plan provides the procedures and guidelines that, when used during facility cleaning, maintenance, and general operations, will minimize human exposure to asbestos fibers and minimize release of asbestos fibers to the environment. This O&M Plan is a long term management approach.

Lead-Based Paint

The Subject Property, constructed before the 1978 ban on lead-based paint (LBP) in consumer products and residences, may contain LBP. Testing is needed to confirm its presence. Paint conditions in rented units and common areas vary (good, fair, and poor), with peeling and flaking in several units inside and outside. Recommendations from MCC include comprehensive testing and removal of damaged LBP following state and local regulations. Non-damaged areas with suspect LBP should be managed under an O&M program. All LBP activities should comply with various regulations, including USEPA's Lead-Based Paint Renovation, Repair, and Painting Program Rule, OSHA's Lead in Construction (CFR Part 1926.62), EPA's Renovate Right regulations, and RCRA guidelines. MCC recommends the development and implementation of a Lead-Based Paint Operations and Maintenance (O&M) Plan for the Subject Property. This O&M Plan provides the procedures and guidelines that, when used during facility cleaning, maintenance, and general operations, will minimize human exposure to lead and minimize release of lead to the environment. This O&M Plan is a long term management approach.

Lead in Drinking Water

Given the age of the buildings at the Subject Property, there is a potential presence of lead in the drinking water attributed to pipes, lead solder, or flux used in the plumbing. However, the assessment's scope did not include taking drinking water samples. To safeguard the integrity of the drinking water supply, MCC recommends performing targeted sampling and analysis to assess the potential presence of lead in the drinking water. This effort will help assess the possible existence of lead within the drinking water system, considering both the historical construction date of the buildings and the potential utilization of lead-based materials in the plumbing infrastructure.

Microbial Growth

MCC made representative observations of areas that are readily accessible, easily visible, and safe with respect to the field observer. The limited observations for microbial growth are not to be construed as an in depth Microbial survey.

Evidence of water intrusion and microbial growth was observed within a majority of the observed units, both occupied and vacant/down units, as well as the common area laundry facilities. The observed microbial growth was present along the drywall ceilings and walls, insulation, within the cabinetry, and along the structural members of the buildings. The observed microbial growth appeared to have been sustained from water damage of a variety of sources, including roof leaks, plumbing leaks, condensate line leaks, and other forms of water intrusion events. Property management appeared to have repaired some of the issues; however, some areas of water intrusion remain active. Microbial growth remediation did not appear to be a standard practice at the Subject Property. Due to the apparent lack of proper remediation, it is reasonable to assume that further microbial growth is present in areas of the buildings that were covered and were unable to be observed.

MCC recommends a Mold Assessment be completed at the property to determine the extent of the growth. Given the extent of affected areas at the Subject Property, MCC further recommends the implementation of a Mold Operation and Maintenance (O&M) Plan be prepared for the Subject Property. A Mold O&M Plan is intended for the owners, employees, and occupants of the Subject Property for their use in controlling the microbial growth and water damaged materials in the building. The O&M Plan provides procedures and guidelines, that used during facility cleaning, maintenance, and general operations, will minimize human exposure to mold and fungus and prevent mold growth due to water damage. A Mold O&M Plan is a long-term management approach and is intended to cover maintenance procedures related to microbial growth, mold, and water damage.

No other BERs were identified in connection with the Subject Property.

1.1.6 Significant Data Gaps

In accordance with ASTM E1527-21, this section documents data gaps in the information obtained and reviewed as part of this Phase I ESA and discusses the associated significance. A data gap is defined in E1527-21 as being *"... a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information."*

No significant data gaps have been identified during the course of this assessment.

1.2 - Conclusions

MCC has performed a Phase I Environmental Site Assessment in conformance with the scope and limitation of ASTM Practice E1527-21 of [REDACTED], the Subject Property. Any exceptions to, or deletions from, this practice are described in Section 9.5 of this report. No historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), or significant data gaps were identified as part of this assessment. This assessment has revealed recognized environmental conditions (RECs) and business environmental risks (BERs) in connection with the Subject Property.

1.3 - Recommendations

Based upon the findings and conclusions of this assessment, MCC recommends the following:

- Regarding the adjoining Chevron facility to the east, MCC recommends an annual monitoring of records over time, particularly in consideration of historical concerns, the age of the tanks, existing residual contamination, and a significant track record of past violations associated with the adjoining facility. At this juncture, no further actions are deemed necessary. This monitoring aligns and serves as a precautionary measure given the historical violations and incidents of tank releases associated with the adjoining property and their operational practices.
- The Subject Property has underground electrical service with pad-mounted transformers owned by [REDACTED], a public utility provider. There was observed apparent leakage from one transformer between Buildings 14 and 16, as evidenced by stained concrete and distressed vegetation around the transformer. This transformer potentially contains PCBs due to its age, as the property was built in 1973. MCC recommends the identified release of dielectric fluid be reported to [REDACTED] and that [REDACTED] determine the manufacturing date and conduct appropriate response actions to remove the impacted concrete pad and any underlying impacted soil. If PCBs are present, MCC additionally recommends that post-excavation confirmatory soil samples be collected and analyzed for the presence of total petroleum hydrocarbons (TPH) and polychlorinated biphenyls (PCBs). Periodic inspections of other units for leakage are recommended.
- MCC recommends comprehensive testing and removal of damaged asbestos following state and local regulations. Additionally, MCC recommends an asbestos inspection be performed in accordance with all applicable federal, state, and local regulatory requirements prior to renovation, demolition, or other activities that could cause a material disturbance. Any removal or disturbance of ACM or suspect ACM should be performed by properly trained personnel and in compliance with federal, state, and local regulations. MCC further recommends the implementation of an Asbestos Operations and Maintenance (O&M) Program. This O&M Plan provides the procedures and guidelines that, when used during facility cleaning, maintenance, and general operations, will minimize human exposure to asbestos fibers and minimize release of asbestos fibers to the environment. This O&M Plan is a long term management approach.
- MCC recommends comprehensive testing and removal of damaged LBP following state and local regulations. Non-damaged areas with suspect LBP should be managed under an O&M program. All LBP activities should comply with various regulations, including USEPA's Lead-Based Paint Renovation, Repair, and Painting Program Rule, OSHA's Lead in Construction (CFR Part 1926.62), EPA's Renovate Right regulations, and RCRA guidelines. MCC recommends the development and implementation of a

Lead-Based Paint Operations and Maintenance (O&M) Plan for the Subject Property. This O&M Plan provides the procedures and guidelines that, when used during facility cleaning, maintenance, and general operations, will minimize human exposure to lead and minimize release of lead to the environment. This O&M Plan is a long term management approach.

- To safeguard the integrity of the drinking water supply, MCC recommends performing targeted sampling and analysis to assess the potential presence of lead in the drinking water. This effort will help assess the possible existence of lead within the drinking water system, considering both the historical construction date of the buildings and the potential utilization of lead-based materials in the plumbing infrastructure.
- MCC recommends a Mold assessment be completed at the property to determine the extent of the growth. Given the extent of affected areas at the Subject Property, MCC further recommends the implementation of a Mold Operation and Maintenance (O&M) Plan be prepared for the Subject Property. A Mold O&M Plan is intended for the owners, employees, and occupants of the Subject Property for their use in controlling the microbial growth and water damaged materials in the building. The O&M Plan provides procedures and guidelines, that used during facility cleaning, maintenance, and general operations, will minimize human exposure to mold and fungus and prevent mold growth due to water damage. A Mold O&M Plan is a long-term management approach and is intended to cover maintenance procedures related to microbial growth, mold, and water damage.

1.4 - Report Viability

In accordance with ASTM E1527-21, the following components of this assessment must be conducted or updated within 180 days prior to the date of acquisition of the subject property or prior to the date of the transaction:

Component	Date
Date of Environmental Database	September 11, 2023
Visual inspection of Subject Property and Adjoining Properties	September 5, 2023
Interviews with owners, operators, and occupants	September 1, 2023 and September 5, 2023
Declaration by the Environmental Professional	October 4, 2023

SITE INFORMATION

A description of the key characteristics of the Subject Property is provided below. This description is derived from information provided by the User and information gathered during the site reconnaissance unless otherwise noted.

2.1 - Subject Property

The Subject Property overview is depicted below:

SUBJECT PROPERTY INFORMATION	
Item	Subject Property Description
Address	[REDACTED] [REDACTED]
County	[REDACTED]
Subject Property Acreage	9.729
Current Owner	[REDACTED]
Number of Buildings	25
Current Occupant(s)	[REDACTED] - Multi-family residential
Number of Parcels	One
Tax ID / Parcel #(s)	[REDACTED]
Legal Description	[REDACTED] [REDACTED]
Current Zoning/Primary Land Use	[REDACTED] Suburban Multi-Family Residential District

2.2 - Building Information

The following buildings were present on the Subject Property:

BUILDING INFORMATION	
Building Identifier	Apartment Buildings (19)

BUILDING INFORMATION	
Total Square Footage of Building(s)	+/- 291,897 Square Feet
Number of Floors	Two and three floor buildings
Construction Date	1973
Current Use	Multi-family housing
Foundation	Concrete slab on grade
Building Materials	Conventional wood framing
Roof Materials	Mixture of modified bitumen, thermoplastic polyolefin (TPO), and asphalt shingles
Heating Source	Electric furnaces
Cooling Source	Split-systems with roof-mounted condensers and closet-mounted air-handlers



Apartment Building Exterior



Apartment Building Exterior

BUILDING INFORMATION	
Building Identifier	Other Buildings (6) - Leasing Office, Guard Shack, Community Laundry Facilities (3), and Maintenance Shed
Total Square Footage of Building(s)	+/- 26,060 Square Feet
Number of Floors	One floor
Construction Date	1973
Current Use	Leasing Office, Maintenance Shed, and Community Laundry Facilities

BUILDING INFORMATION	
Foundation	Concrete slab on grade
Building Materials	Conventional wood framing
Roof Materials	Asphalt shingles
Heating Source	The Leasing Office is heated by an electric furnace, while the Guard Shack, Community Laundry Facilities (3), and Maintenance Shed do not have a heating source.
Cooling Source	The Leasing Office is cooled by a split-system with a pad-mounted condenser and closet-mounted air handler, while the Guard Shack, Community Laundry Facilities (3), and Maintenance Shed do not have a cooling source.



Leasing Office Front Elevation



Community Laundry Facility Exterior

UTILITIES	
Electrical	Electricity is provided by [REDACTED].
Natural Gas	There is no natural gas present at the Subject Property.
Potable Water	Potable water is provided by [REDACTED].
Wastewater/Sewer	Sewage service is provided by [REDACTED].
Other Utility Information	There are no other utilities present at the Subject Property.

2.3 - Adjacent Properties

The adjacent properties were occupied by the following:

Direction From Subject Property	Current Use
North	Residential homes with addresses ranging from [REDACTED] to [REDACTED], [REDACTED], and multi-family housing ranging from [REDACTED] to [REDACTED].
South	[REDACTED], beyond which is [REDACTED]
East	Chevron gas station at [REDACTED], multi-family housing ranging from [REDACTED] to [REDACTED], and [REDACTED]. Beyond is [REDACTED].
West	[REDACTED], single-family residences from [REDACTED], and [REDACTED].



North Adjacent - Single-family Residential



East Adjacent - Chevron Gas Station and Time Saver



South Adjacent - North [REDACTED]



West Adjacent - Single-family Residential

2.4 - Physical Setting

TOPOGRAPHY	
Setting	Description
Elevation	Approximately 6.5 feet below mean sea level. Elevations do not vary significantly across the Subject Property.
Slope	The slope in the general topographic region appears to be to the south-south-east.
Nearest Body of Water	The nearest body of water is [REDACTED], located approximately 125 feet west of the Subject Property.

SOILS	
Setting	Description
Soil Classification	The Subject Property is located in an area comprised of the soil type known as Allemands Muck (Ae).
Soil Drainage	Allemands Muck (Ae) typically has poor drainage qualities.

GEOLOGY	
Setting	Description
Rock Types	The primary rock types are clay and mud, while the secondary rock type is sand.
Description	Gray to brownish gray clay and silty clay, reddish brown in the Red River Valley, some sand and gravel locally.
Estimated Depth to Bedrock	Greater than 200 centimeters.

HYDROGEOLOGY	
Setting	Description
Estimated Depth to Water Table	The estimated depth to groundwater is 27 inches.
Estimated Groundwater Flow Direction	South-south-east

OTHER PHYSICAL SETTING INFORMATION	
Setting	Description
Flood Zone	The majority of the Subject Property is located in flood zone X; however, a portion of the southwest corner is located in flood zone AE. X - Moderate risk areas within the 0.2-percent-annual-chance floodplain, areas of 1-percent-annual-chance flooding where average depths are less than 1 foot, areas of 1-percent-annual-chance flooding where the contributing drainage area is less than 1 square mile, and areas protected from the 1-percent-annual-chance flood by a levee. No BFEs or base flood depths are shown within these zones. (Zone X (shaded) is used on new and revised maps in place of Zone B.) AE - Areas subject to inundation by the 1-percent-annual-chance flood event determined by detailed methods. BFEs are shown within these zones. (Zone AE is used on new and revised maps in place of Zones A1-A30.)
Wetlands	Review of the National Wetlands Inventory indicated that the Subject Property is not located in a designated wetlands area.
Oil & Gas Records	Review of the [REDACTED] indicated that no oil and gas wells were identified at or near the Subject Property.

USER-PROVIDED INFORMATION

In accordance with ASTM Standard E1527-21, Moran Construction Consultants requested that the User of this Phase I ESA provide information that would assist in identifying the potential for RECs in connection with the Subject Property. Information received from the User is contained in the appendices of this report and is summarized in the table below. Issues identified by Moran Construction Consultants during the review of the information along with related comments are also presented.

Type of Information	User Provided	Issue Identified	Comments
Title Records	No	No	No title information was requested or provided. Title records were researched back to 2014. No environmentally significant ownership was identified. A full chain of title search was not performed based on the scope of work of this assessment. Readily available ownership information was reviewed from the local tax assessor's office.
Environmental Liens or Activity and Use Limitations	No	No	The user did not engage MCC to review title and judicial records for environmental liens or Activity and Use Limitations (AULs) recorded against the Subject Property. Furthermore, these documents were not provided to MCC for review. The lack or inability to obtain this information represents a data gap. However, based on the findings of this report, the absence of this information is not considered a significant data gap.
Specialized Knowledge	No	No	
Commonly Known or Reasonably Ascertainable Information	No	No	
Valuation Reduction for Environmental Issues	No	No	
Previous Reports	Yes	Yes	One REC was identified. See below for additional details.
User Provided Documentation	Yes	No	
Reason for Performing the Phase I	Yes	No	
ASTM User Questionnaire	Yes	No	

MCC was provided a copy of a previous Phase I Environmental Site Assessment report for the Subject Property, prepared by [REDACTED] and dated April 7, 2014. Pertinent information identified in that report is as follows:

- The Subject Property was occupied by the current improvements at the time of the previous assessment.
- The Scope of Work for this previous assessment consisted of ASTM E 1527-13.
- The review of historical data for the Subject Property and surrounding area did not identify significant environmental concerns.
- The review of operations at the Subject Property did not identify any significant environmental concerns.
- The Subject Property was not involved in the use of hazardous materials, with the exception of routine janitorial and maintenance supplies.
- The Subject Property was not involved in the generation of hazardous, regulated, or medical waste.
- Environmental sampling (lead paint, radon, asbestos, mold, etc.) was not performed. Based on the construction date, OGI determined there may be a potential for asbestos and lead-based paint.
- No evidence of storage tanks or pipelines (above or below ground) was identified.
- The review of regulatory agency data identified the [REDACTED] Chevron [REDACTED] located at [REDACTED] [REDACTED] which adjoins the Subject Property to the east. [REDACTED] determined the USTs, although they do not appear to have contributed to groundwater contamination beneath the site, may be considered an area of potential environmental concern due to their relative position. [REDACTED] recommended a periodic review of the most current information from the [REDACTED] website for corrective action in order to assess the potential for future impacts to the subject site. Refer to [4.2 Adjacent Properties Database Records of Concern](#) for additional and updated information.
- No other action or investigation was recommended.

RECORDS REVIEW

In accordance with ASTM Practice E1527-21, Moran Construction Consultants reviewed applicable and reasonably accessible federal, state, and local records as part of this Phase I ESA. The environmental records review was performed in the form of an environmental database search conducted by Environmental Risk Information Services (ERIS), in an attempt to ascertain whether the Subject Property or neighboring properties were suspected of having environmental conditions with the potential to impact (or that have impacted) the soil, groundwater, and/or soil gas at the Subject Property. The database search included regulatory agency lists of known or potential hazardous waste facilities, landfills, hazardous waste generators, and disposal facilities in addition to properties under investigation under investigation due to identified or potential contamination. The information provided in this section was obtained from publicly available sources. The locations of the properties listed in this report are plotted with a geographic information system (GIS) utilizing geocoding of property addresses. Specific records and search distances for these environmental databases were reported by ERIS to be consistent with ASTM Practice E1527-21 and are discussed in the ERIS report (dated September 11, 2023). The ERIS report is contained in the Database Report Appendix of this Phase I ESA report.

Regulatory Report Summary

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
AFS	0.02	0	-	-	-	-	0
ALT FUELS	0.25	0	0	0	-	-	0
ASBESTOS	0.125	0	0	-	-	-	0
BFLD [REDACTED] [REDACTED]	0.5	0	0	1	2	-	3
BFLD POTENTIAL	0.5	0	0	0	0	-	0
BULK TERMINAL	0.25	0	0	0	-	-	0
CDL	0.02	0	-	-	-	-	0
CERCLIS	0.5	0	0	0	0	-	0
CERCLIS LIENS	0.02	0	-	-	-	-	0
CERCLIS NFRAP	0.5	0	0	0	0	-	0

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
CONSENT DECREES	0.25	0	0	0	-	-	0
DDEB	0.25	0	0	0	-	-	0
DEBRIS	0.5	0	0	0	0	-	0
DEBRIS	0.5	0	0	0	0	-	0
DELETED NPL	0.5	0	0	0	0	-	0
DELISTED DRYCLEANERS	0.25	0	0	0	-	-	0
DELISTED FED DRY	0.25	0	0	0	-	-	0
DELISTED FRP	0.25	0	0	0	-	-	0
DELISTED INDIAN LST	0.5	0	0	0	0	-	0
DELISTED INDIAN UST	0.25	0	0	0	-	-	0
DELISTED LUST	0.5	0	0	0	0	-	0
DELISTED SHWS	1.0	0	0	0	0	0	0
DELISTED TANK	0.25	0	0	0	-	-	0
DOE FUSRAP	1.0	0	0	0	0	0	0
DRYCLEANERS	0.25	0	0	2	-	-	2
ERNS	0.02	0	-	-	-	-	0
ERNS 1982 TO 1986	0.02	0	-	-	-	-	0
ERNS 1987 TO 1989	0.02	0	-	-	-	-	0

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
ERNS PFAS	0.5	0	0	0	0	-	0
EVAL AND CLOSED	0.5	0	1	2	2	-	5
FED BROWNFIELDS	0.5	0	0	0	0	-	0
FED DRYCLEANERS	0.25	0	0	1	-	-	1
FED ENG	0.5	0	0	0	0	-	0
FED INST	0.5	0	0	0	0	-	0
FEMA UST	0.25	0	0	0	-	-	0
FINDS/FRS	0.02	0	1	-	-	-	1
FORMER NIKE	1.0	0	0	0	0	0	0
FRP	0.25	0	0	0	-	-	0
FTTS ADMIN	0.02	0	-	-	-	-	0
FTTS INSP	0.02	0	-	-	-	-	0
FUDS	1.0	0	0	0	0	0	0
FUDS MRS	1.0	0	0	0	0	0	0
HIST GAS STATIONS	0.25	0	0	0	-	-	0
HIST MLTS	0.02	0	-	-	-	-	0
HIST TSCA	0.125	0	0	-	-	-	0
HMIRS	0.125	0	0	-	-	-	0
ICIS	0.02	0	-	-	-	-	0
INDIAN LUST	0.5	0	0	0	0	-	0
INDIAN UST	0.25	0	0	0	-	-	0
INST	0.5	0	0	2	0	-	2

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
IODI	0.5	0	0	0	0	-	0
LIENS	0.02	0	-	-	-	-	0
LM SITES	1.0	0	0	0	0	0	0
LUCIS	0.5	0	0	0	0	-	0
LUST	0.5	0	1	2	4	-	7
LUST HISTORICAL	0.5	0	1	0	4	-	5
MINES	0.25	0	0	0	-	-	0
MLTS	0.02	0	-	-	-	-	0
MRDS	1.0	0	0	0	0	0	0
NCDL	0.125	0	0	-	-	-	0
NPL	1.0	0	0	0	0	0	0
NPL IC	0.5	0	0	0	0	-	0
ODI	0.5	0	0	0	0	-	0
PCB	0.5	0	0	0	0	-	0
PCBT	0.5	0	0	0	0	-	0
PFAS	0.5	0	0	0	0	-	0
PFAS E-MANIFEST	0.5	0	0	0	0	-	0
PFAS FED SITES	0.5	0	0	0	0	-	0
PFAS IND	0.5	0	0	0	0	-	0
PFAS NPDES	0.5	0	0	0	0	-	0
PFAS NPL	0.5	0	0	0	0	-	0
PFAS SSEHRI	0.5	0	0	0	0	-	0
PFAS TRI	0.5	0	0	0	0	-	0
PFAS TSCA	0.5	0	0	0	0	-	0

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
PFAS WATER	0.5	0	0	0	0	-	0
PIPELINE INCIDENT	0.02	0	-	-	-	-	0
PROPOSED NPL	1.0	0	0	0	0	0	0
PRP	0.02	0	-	-	-	-	0
RCRA CONTROLS	0.5	0	0	0	0	-	0
RCRA CORRACTS	1.0	0	0	0	0	0	0
RCRA LQG	0.25	0	0	0	-	-	0
RCRA NON GEN	0.25	0	0	0	-	-	0
RCRA SQG	0.25	0	0	2	-	-	2
RCRA TSD	0.5	0	0	0	0	-	0
RCRA VSQG	0.25	0	1	2	-	-	3
RECYCLING	0.5	0	0	0	0	-	0
REFN	0.25	0	0	0	-	-	0
SCRD DRYCLEANER	0.5	0	0	0	0	-	0
SEMS	0.5	0	0	0	0	-	0
SEMS ARCHIVE	0.5	0	0	0	0	-	0
SEMS LIEN	0.02	0	-	-	-	-	0
SERVICE STATIONS	0.5	0	0	0	0	-	0
SHWS	1.0	0	0	1	0	0	1
SHWS INACT	1.0	0	0	1	1	0	2

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
SMCRA	1.0	0	0	0	0	0	0
SPILLS	0.125	0	5	-	-	-	5
SSTS	0.25	0	0	0	-	-	0
SUPERFUND ROD	1.0	0	0	0	0	0	0
SWF PERMITS	0.5	0	0	0	1	-	1
SWF/LF	0.5	0	0	0	0	-	0
TRIS	0.02	0	-	-	-	-	0
TSCA	0.125	0	0	-	-	-	0
UST	0.25	0	1	3	-	-	4
UST HISTORICAL	0.25	0	0	0	-	-	0
VCP	0.5	0	0	2	0	-	2
WASTE PITS	0.5	0	0	0	0	-	0
WASTE TIRE GEN	0.02	0	-	-	-	-	0

4.1 - Subject Property Database Records of Concern

Moran Construction Consultants reviewed the regulatory information provided in the database report to identify listed facilities located within the approximate minimum search distances. The Subject Property was not listed in the regulatory database report.

MCC researched the [REDACTED] [REDACTED] to perform a file review on the Subject Property for [REDACTED]. No documents were found on file within the database; therefore, no further action appears warranted.

4.2 - Adjacent Properties Database Records of Concern

Significant off-site facilities identified in the database report are included in the following table and discussed below the table.

Other off-site facilities were identified and evaluated in the regulatory database report but were not considered to be significant based on considerations such as the type of regulatory listing, apparent hydrological relationship to the Subject Property, information provided in the database report, and/or Moran Construction Consultants's observation during the area reconnaissance.

Surrounding Properties Summary

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
RCRA VSQG	CHEVRON [REDACTED]	[REDACTED]	0.01/NE	0	See further discussion below.
FINDS/FRS	CHEVRON [REDACTED]	[REDACTED]	0.01/NE	0	See further discussion below.
UST	[REDACTED] Chevron	[REDACTED]	0.01/NE	0	Active. See further discussion below.
EVAL AND CLOSED	[REDACTED] Chevron	[REDACTED]	0.01/NE	0	Approved Completion of "NFA w/ BOD"- No Further Action (NFA) with Basis of Decision. See further discussion below.
SPILLS		[REDACTED]	0.01/NE	0	Closed. See further discussion below.
LUST HISTORICAL	CHEVRON [REDACTED]	[REDACTED]	0.01/NE	0	See further discussion below.
LUST	[REDACTED] Chevron	[REDACTED]	0.01/NE	0	No Further Action. See further discussion below.

Database	Site Name	Address	Dist. (mi) / Dir.	Elev. diff. (ft)	Comments
SPILLS	██████	██████████ ██████████ ██████████ ██████████ ██████	0.03/WSW	-1	Closed. No concerns identified.
SPILLS		██████████ ██████████ ██████████ ████	0.09/WSW	-2	Closed. No concerns identified.
SPILLS	██████	██████████ ██████████ ██████████ ██████████ ██████████	0.09/SE	-1	Closed. No concerns identified.
SPILLS	██████████ ██████████ ██████████ ██████████ ██████	██████████ ██████████ ██████████ ██████████	0.09/SE	-1	Referred to enforcement. Based on distance, this SPILLS listing is not anticipated to affect the environmental integrity of the Subject Property.
UST	██████ ██████	██████████ ██████████ ██████████ ██████	0.20/ESE	1	No concerns identified.
EVAL AND CLOSED	██████ ██████	██████████ ██████████ ██████████ ██████	0.20/ESE	1	Closed. No concerns identified.
LUST	██████ ██████	██████████ ██████████ ██████████ ██████	0.20/ESE	1	Closed. REM, UST Incident NFA'd. No concerns identified.
RCRA VSQG	████ TAILOR & CLNRS	██████████ ██████████ ██████████ ██████████	0.21/N	-1	As of July 2023, there are no Compliance Monitoring and Enforcement (violation) records associated with this facility. No concerns identified.

The SPILLS database states an incident on December 20, 2008, where a spill of less than five (5) gallons occurred. The spill occurred as a customer was fueling a vehicle in the unattended mode and the automatic fuel shutoff failed. Absorbents were used to recover spilled gas on the pavement. The gas pump was serviced and the automatic fuel shutoff was repaired. The media affected is listed as water and soil. However, only pavement is mentioned. The incident status is listed as closed. Such a status is awarded only when contamination, if any, has been investigated and/or remediated in accordance with the regulatory standards accepted at the time closure was granted. Based on the regulatory status, quantity of release, and reported clean up no further action appears warranted in regards to this listing.

The UST database is a listing of facilities that are required to register their USTs for tracking purposes. The UST database indicates that three tanks of gasoline have UST Certificates last issued on May 7, 2023.

The LUST HISTORICAL database provides descriptive leaking facility reports from [REDACTED]. This database has not been updated since 1999. Information in the database indicates a Chevron employee discovered a spill bucket was pulled off an unleaded fill port. Product and water was removed from the tank pit. Reportedly 100 gallons of gasoline overfill occurred on September 17, 1998. A limited site assessment was received on January 19, 1999 and approved on February 9, 1999. This was listed as Incident No. [REDACTED]. No additional information for this database was provided.

Information in the LUST database indicates a gasoline release. The site is listed as Agency Interest (AI) # [REDACTED] and a completed date was listed as April 5, 2011 with the incident task description listed as "REM, UST Incident NFA'd", which describes remediation occurred due to a UST incident and No Further Action (NFA) was issued. Such a status is awarded only when contamination, if any, has been investigated and/or remediated in accordance with the regulatory standards accepted at the time closure was granted. However, residual contamination often remains at sites that have received regulatory closure and use limitations, and other restrictions may exist as a condition of the regulatory closure.

The Remediation Division of [REDACTED] includes sites on their Evaluated and Closed (EAC) list when (a) some sort of remediation (either investigation and/or corrective action) has taken place, or (b) after an initial review, a determination has been made that the site does not fall under their jurisdiction. Information in the EVAL AND CLOSED listing indicates remediation oversight was conducted, and the status indicated an approved completion NFA w/ BOD as of April 5, 2011 ([REDACTED] ID [REDACTED]), which means a Basis of Decision with No Further Action. No other information was provided.

MCC researched the [REDACTED] to perform a file review regarding the adjoining Chevron gasoline station. The UST registrations identified three 9,728-gallon fiberglass with reinforced plastic double-walled gasoline tanks were installed on January 1, 1988. Internal protection was reported as "none" at this time.

A fill port release of gasoline occurred on September 16, 1998. The responsible party for a release was named as "Chevron Products Company", otherwise known as Chevron Facility No. [REDACTED]. This release appears to relate to the LUST HISTORICAL and LUST database listings. A leak of unleaded gasoline resulted from the separation of a spill containment bucket from the drop tube, which was subsequently repaired. The initial site investigation was conducted by [REDACTED]. Six soil exploration borings (MW-1 through MW-6) were installed to a maximum depth of 12.5 feet and completed as four-inch diameter monitor wells. Soils encountered were predominantly of clay and silty/sandy clays overlying sandy silts and silty sands. Analyses of two of the soil samples revealed concentrations of petroleum hydrocarbons above RECAP Screening Standards in soil samples from MW-3 and MW-5 (near the tank hold area). Analyses of groundwater samples revealed

concentrations of benzene and TPH-G above RECAP Screening Standards in the samples from MW-3 and MW-5. The highest concentrations of dissolved hydrocarbon constituents were detected from monitoring well MW-5, located northeast (downgradient) of the tank hold, which was determined to be the source of the release. No phase-separated hydrocarbons were encountered in any of the monitor wells (MW-1 through MW-6). Total lead in groundwater was detected above RECAP Screening Standards in MW-1, MW-2, and MW-3. Groundwater flow was determined to be to the east and west. However, directional flow in the appended maps indicate to the east northeast. The results of the investigation indicated that hydrocarbon impact is limited to the vicinity of the tank hold and an area north of the tank hold on the property. Quarterly monitoring was recommended as required by [REDACTED].

In June of 2000, the site was razed in order for the construction of the new Chevron facility. During the construction activities, monitor wells MW-2 and MW-3, which interfered with the new station layout, were plugged and abandoned. In August of 2000, approximately 75 cubic yards of impacted soil were excavated in the vicinity of MW-5. Monitoring well MW-5 was plugged and abandoned as a result of the excavation.

In November of 2002, an investigation was conducted that included the installation of six soil borings (SB-04 through SB-09) and the collection of soil and groundwater samples for BTEX, MTBE, TPH-GRO, lead, and VPH were analyzed. Concentrations of BTEX, TPH-GRO, and VPH exceeded the Remediation Evaluation, Cost Analysis, and Project Manager (RECAP) limits for soils, and BTEX, MTBE, TPH-GRO, lead, and VPH exceeded the RECAP limits for groundwater. The results of a RECAP evaluation indicated two areas of concern (AOCs) where soil benzene and xylene concentrations and groundwater benzene concentrations were detected above site-specific limits RECAP standards (LRS). [REDACTED] requested a Corrective Action Plan (CAP) for the site.

In November 4, 2004, a [REDACTED] was identified. This document noted three wells were installed to be sampled annually.

A work plan proposed to further delineate the extent of the elevated constituent of concerns (COCs) beneath the building as well as extent of impact in the vicinity of the UST tank was approved by [REDACTED] on September 26, 2005. Enclosed structure (indoor air) concerns were initiated under the [REDACTED] June 20, 2000, RECAP; however, the enclosed structure standards were revised in accordance to the 2003 RECAP document.

An inspection on [REDACTED] after Hurricane [REDACTED], by [REDACTED], was performed. The inspection indicated the property was not in operation and had no electricity yet. [REDACTED] performed some checking of the tanks and a manhole was open. The property was indicated to have flooded by approximately five feet of water but the facility was no longer submerged. No significant damage was reported.

By 2006, the UST tanks were back in operation with registered permits. In November of 2006, an investigation included the installation of eight soil borings (SB-10 through SB-15, MW-7, and MW-8) and the collection of soil and groundwater samples for lab analyses. The laboratory results indicated concentrations of benzene and xylenes exceeded the site-specific LRS for soils.

On March 6, 2007, [REDACTED] requested a Corrective Action Plan (CAP) addendum to adequately reduce contaminant at the site. The risk evaluation was updated and the report was revised for the areas of concern (AOC-1/AOC-2) to evaluate using an industrial exposure setting, including an enclosed structure standard.

Analytical data submitted January 12, 2010 indicated that concentrations in soil and groundwater fall below the standards. Correspondence dated April 20, 2010 stipulated the monitoring wells present at the property be properly plugged and abandoned prior to the issuance of an NFA-ATT (Assessment Termination or Transfer) decision by [REDACTED]. A report submitted to [REDACTED], dated September 2, 2010, indicated proper closure of monitoring wells MW-1, MW-4, and MW-6 through MW-9.

On April 5, 2011 [REDACTED] issued a No Further Action Notification for FID No. [REDACTED], Incident number [REDACTED]. [REDACTED] reviewed the site investigation and RECAP report dated June 30, 2004, Risk Evaluation/Corrective Action Program (RECAP) Addendum dated May 7, 2007, and the Monitor Well and Abandonment/NFA-ATT Request dated September 2, 2010 for the area of investigation. Based on [REDACTED]'s review, [REDACTED] determined no further action was necessary at this time and a Basis of Decision notification was presented. [REDACTED] instructed that no soils may be removed from the site without prior approval from [REDACTED] unless they are removed and disposed at a permitted disposal facility. Prior to the construction of enclosed structures over any portion of the impacted area, further evaluation and approval from [REDACTED] is required.

A routine UST compliance inspection from [REDACTED] was conducted on March 9, 2017, which indicated the tanks are fiberglass reinforced plastic (FRP) and were installed January 1, 1988. The piping is fiberglass and pressured. Spill and overfill prevention devices were installed on June 1, 1994. [REDACTED] documented the facility had not retained 36 months of release detection records as required. Specifically, the facility was missing release detection records for November 2015 through February 2017. The facility manager, [REDACTED], stated that the records were accidentally thrown away. The test readings passed for each tank at the time of inspection.

[REDACTED] performed a compliance inspection on January 10, 2023 that indicated the respondent failed to submit a UST-REG form to the department and failed to ensure that the spill prevention equipment is liquid tight. The spill prevention on the tanks do not have liquid-tight sides and bottom according to the failed test conducted on August 23, 2021 by [REDACTED], Inc. Additionally, the respondent failed to ensure the overfill device is inspected every three years and failed to perform monthly and annual walkthrough inspections on time. A notice of penalty was issued by [REDACTED] on January 13, 2023. On March 2, 2023, new spill overfill prevention in the form of an automatic shut off for each tank was installed. March 27, 2023, [REDACTED] determined the areas concern from these penalties have been adequately addressed.

The adjoining Chevron facility to the east poses a recognized environmental condition (REC) to the Subject Property based on historical releases, residual contamination, and a history of violations. However, the facility has undergone remediation to rectify the situation, and per the [REDACTED] ([REDACTED]), has affectively addressed the releases and violations. MCC recommends an annual monitoring of records over time, particularly in consideration of historical concerns, the age of the tanks, existing residual contamination, and a significant track record of past violations associated with the adjoining facility. At this juncture, no further actions are deemed necessary. This monitoring aligns and serves as a precautionary measure given the historical violations and incidents of tank releases associated with the adjoining property and their operational practices.

4.3 - Additional Environmental Records Sources

Local and state agencies were contacted to review available current or previous documentation of hazardous materials use, storage, and/or unauthorized releases that may have impacted the Subject Property. The agencies contacted are listed in the table below.

Source	Date Contacted	Information Received	Comments
Zoning Department	09/12/23		A FOIA request to the [REDACTED] Planning Commission was made for information regarding the Subject Property. A response was provided by the department; however, the response did not contain pertinent information. Online information from the City of [REDACTED] determined the Subject Property is zoned [REDACTED]; Suburban Multi-Family Residential District.
Fire Department	09/12/23	✓	A FOIA request to the [REDACTED] Fire Department was made for information regarding the Subject Property. The fire department stated that their research dates from January 1, 2000, to present, and that there are no current fire code violations at the Subject Property. They stated that the last fire department inspection was on May 31, 2022, where no violations were observed. They further stated that no documentation of any petroleum product/hazardous material storage tanks was found that was addressed by [REDACTED]. Regarding releases of petroleum products and/or hazardous materials, they stated that the [REDACTED] documented a report of an odor of gas in unit #251 on September 1, 2013. No further information or documentation was found regarding releases.
[REDACTED] [REDACTED] [REDACTED] [REDACTED] ([REDACTED])	09/14/23	✓	MCC researched the [REDACTED] database for the Subject Property and nearby areas of concern. No information was identified for the Subject Property. Information identified for nearby areas of concern can be found in Section 4.2.
Code Enforcement	9/12/23	✓	A FOIA request to the [REDACTED] Code Enforcement Department was made for information regarding the Subject Property. A response was provided by the department where past records regarding code violations were available for purchase. Review of the purchased records did not indicate any environmentally significant concerns or information

4.4 - Vapor Migration

Moran Construction Consultants conducted a vapor migration screening of the Subject Property. MCC's site observations and review of the environmental database report did not identify any conditions on the Subject Property or adjoining properties, with the exception of the adjoining Chevron gasoline station located at [REDACTED] in [REDACTED]. As cited in Section 4.2, in 1998 a release was reported at the Chevron gas station. Later, in 2011 after remediation, [REDACTED] determined no further action was necessary at this time.

■■■■ instructed that no soils may be removed from the site without prior approval from ■■■■ unless they are removed and disposed at a permitted disposal facility, indicating the potential for residual contamination. Based on the laboratory analyses reported, soil contamination was not reported near the monitoring wells located on the west boundary of the Chevron gasoline station, near the Subject Property. Instead initial actionable levels were reported just north and east of the UST area, further away from the Subject Property. Based on the current regulatory status and subsurface characteristics, no further action appears warranted at this time.

This vapor migration screening was conducted in accordance with ASTM E1527 and is not intended to satisfy the requirements of ASTM E2600 Standard guide for Vapor Encroachment Screening. The scope of this screening was limited to visual observations and review of the environmental database report and did not include the collection and laboratory analysis of air samples to confirm or refute the presence of airborne contaminants by vapor intrusion.

HISTORICAL RECORDS REVIEW

As part of this Phase I ESA, Moran Construction Consultants attempted to develop a history of the previous uses of the Subject Property and surrounding area to help identify past uses that may have resulted in one or more RECs at the Subject Property. Efforts were made to identify the uses of the Subject Property back to the Subject Property's first use, or back to 1940, whichever is earlier.

5.1 - Historical Records Sources & Availability

The table below summarizes the historical resources that were available for review.

Year	Aerial Photographs	Historical Topographic Maps	Fire Insurance Maps	City Directories
Not Available				
Prior to 1940		✓		✓
1940 - 1945	✓	✓		✓
1946 -1950				
1951 -1955	✓	✓		✓
1956 - 1960				✓
1961 - 1965	✓			✓
1966 - 1970		✓		✓
1971 - 1975	✓	✓		✓
1976 - 1980	✓	✓	✓	
1981 - 1985				✓
1986 - 1990	✓			✓
1991 - 1995		✓	✓	✓
1996 - 2000	✓	✓		✓
2001 - 2005	✓			✓
2006 - 2010	✓			✓
2011 - 2015	✓	✓		✓

Year	Aerial Photographs	Historical Topographic Maps	Fire Insurance Maps	City Directories
2016 - 2020	✓	✓		✓
Current	✓			✓

5.2 - Past Uses of Subject Property

Based on User provided information and a review of available records including aerial photographs, topographic maps, city directories, and fire insurance maps, the previous uses of the Subject Property are described in the table below in intervals where meaningful property changes were noted.

PAST USES OF SUBJECT PROPERTY		
Date	Description	Historical Source
1892-1952	The Subject Property appeared to be wooded, undeveloped land.	Aerial Photograph Topographic Map City Directory
1965-1972	The Subject Property appeared to be wooded, undeveloped land and vacant landcleared of trees, shrubbery, etc.	Aerial Photograph Topographic Map City Directory
1973-Present	The Subject Property appeared to be developed with multi-family housing from at least 1973 to present day.	Aerial Photograph Topographic Map Fire Insurance Maps City Directory Other

5.3 - Past Uses of Adjoining Properties

Based on a review of available records including aerial photographs, topographic maps, city directories, and fire insurance maps, the historic uses of the adjoining properties are described in the table below.

PAST USES OF ADJOINING PROPERTIES			
Date	Direction	Description	Historical Source
1946-1952	North	The adjoining property appeared to be wooded, undeveloped land.	Aerial Photograph Topographic Map City Directory
	South	The adjoining property appeared to be wooded, undeveloped land.	

PAST USES OF ADJOINING PROPERTIES			
Date	Direction	Description	Historical Source
	East	The adjoining property appeared to be wooded, undeveloped land.	
	West	The adjoining property appeared to be wooded, undeveloped land.	
1965	North	The adjoining property appeared to be cleared, vacant land.	Aerial Photograph Topographic Map City Directory
	South	The adjoining property appeared to be developed with [REDACTED]	
	East	The adjoining property appeared to be utilized as agricultural land.	
	West	The adjoining property appeared to be cleared, vacant land.	
1972-1978	North	The adjoining property appeared to be developed with residential homes.	Aerial Photograph Topographic Map City Directory
	South	Expansion of [REDACTED] at the adjoining property continued.	
	East	Commercial housing development of the adjoining property appeared present.	
	West	Development of [REDACTED] occurred.	
1989-Present	North	Continued residential development.	Aerial Photograph Topographic Map Fire Insurance Maps City Directory
	South	No further changes to the adjoining property appeared to have occurred.	
	East	Construction of a structure that appears to be the same building as the currently occupied Chevron gas station. Refer to Section 4.2 for further information.	
	West	No further changes to the adjoining property appeared to have occurred.	

5.4 - Past Uses of Surrounding Properties

Based on a review of available records including aerial photographs, topographic maps, city directories, and fire insurance maps. the historical uses of the surrounding properties are described in the table below.

PAST USES OF SURROUNDING PROPERTIES			
Date	Direction	Description	Historical Sources
1946-1952	North	The surrounding properties appeared to be wooded, undeveloped land.	Aerial Photograph Topographic Map City Directory
	South	The surrounding properties appeared to be wooded, undeveloped land.	
	East	The surrounding properties appeared to be wooded, undeveloped land.	
	West	The surrounding properties appeared to be wooded, undeveloped land.	
1965	North	The surrounding properties to the north appeared to be cleared, vacant land.	Aerial Photograph Topographic Map City Directory
	South	The surrounding properties to the south appeared to be wooded, undeveloped land.	
	East	The surrounding properties to the east appeared to be utilized as agricultural land.	
	West	The surrounding properties to the west appeared to be cleared, vacant land.	
1972	North	The surrounding properties to the north appeared to be developed with residential homes.	Aerial Photograph Topographic Map City Directory
	South	The surrounding properties to the south appeared to be developed with commercial housing.	
	East	The surrounding properties to the east appeared to be utilized as agricultural land.	
	West	Apparent residential home development continued.	
1978	North	Apparent residential home development continued.	Aerial Photograph Topographic Map City Directory
	South	No changes to the surrounding properties appeared to have occurred.	
	East	The surrounding properties to the east appeared to be developed with commercial housing.	
	West	Apparent residential home development continued.	

PAST USES OF SURROUNDING PROPERTIES			
Date	Direction	Description	Historical Sources
1989-2009	North	Apparent residential home development continued.	Aerial Photograph Topographic Map Fire Insurance Maps City Directory
	South	Further construction of commercial structures appeared to have occurred.	
	East	No changes to the surrounding properties appeared to have occurred.	
	West	No changes to the surrounding properties appeared to have occurred.	
2010	North	No changes to the surrounding properties appeared to have occurred.	Aerial Photograph Topographic Map City Directory
	South	A commercial housing property to the south appeared to have gone under demolition.	
	East	No changes to the surrounding properties appeared to have occurred.	
	West	No changes to the surrounding properties appeared to have occurred.	
2013-2015	North	No changes to the surrounding properties appeared to have occurred.	Aerial Photograph Topographic Map City Directory
	South	The previously demolished property to the south appeared to be vacant land.	
	East	No changes to the surrounding properties appeared to have occurred.	
	West	No changes to the surrounding properties appeared to have occurred.	
2017-Present	North	No changes to the surrounding properties appeared to have occurred.	Aerial Photograph Topographic Map City Directory
	South	Construction of an apparent new commercial structure on the previously demolished/vacant property to the south appeared to have occurred.	
	East	No changes to the surrounding properties appeared to have occurred.	
	West	No changes to the surrounding properties appeared to have occurred.	

SITE RECONNAISSANCE

As part of the site reconnaissance, Moran Construction Consultants looked for evidence of the presence of hazardous substances used, stored, or discarded at and near the Subject Property. A summary of the site reconnaissance is provided below. Locations of pertinent observations are depicted on the Figures provided in this report. Photographs of pertinent findings and features observed during the site reconnaissance are provided in the Photographic appendix of this report.

6.1 - Site Reconnaissance Findings

An overview of the findings during on-site reconnaissance are notated below:

Feature or Condition	Observed on Subject Property	Observed on Adjacent Property
Hazardous Substances and Petroleum Products in Connection with Identified Uses	✓	✓
Underground Storage Tanks (UST)		✓
Aboveground Storage Tanks (AST)		
Odors	✓	
Standing Surface Water and Pools or Sumps Containing Liquids Likely to be Hazardous Substances or Petroleum Products		
Drums, Totes, and Intermediate Bulk Containers		
Hazardous Substance and Petroleum Product Containers Not in Connection with Identified Uses	✓	
Unidentified Substance Containers		
Transformers or PCB-Containing Equipment/Items	✓	
Stains or Corrosion on Floors, Walls, or Ceilings		
Drains and Sumps	✓	
Pits, Ponds, or Lagoons		
Stained Soil or Pavement	✓	
Stressed Vegetation	✓	
Solid Waste	✓	✓

Feature or Condition	Observed on Subject Property	Observed on Adjacent Property
Water/Wastewater Discharge	✓	
Wells		
Septic Systems or Cesspools		

6.1.1 Hazardous Substances and Petroleum Products (Identified Uses)

HAZARDOUS SUBSTANCES AND PETROLEUM PRODUCTS IN CONNECTION WITH IDENTIFIED USES			
Substance	Approximate Quantity	Location	Storage Condition
Routine Janitorial Supplies	Small retail sized containers and up to 1 gallon containers.	Leasing Office janitorial supply and maintenance closets, as well as within cabinets and residential units.	Good: No leaks or spills
Pool Treatment Compounds	Small quantity containers, 5 gallon containers, and a container that is approximately 75 gallons (25% filled with hypochlorite solution).	Leasing Office exterior near the pool and scattered throughout interior of the office.	Good: No leaks or spills
Routine Maintenance Supplies (Paint, Drain Cleaner, WD-40, Vacuum Pump Oil, etc.)	Retail sized containers and up to 5 gallon containers.	Leasing Office. In closets and scattered throughout interior.	Good: No leaks or spills

The Subject Property is involved in the use of hazardous substances and petroleum products as described in the above table.

Some of the identified materials appear to be properly stored; however, small quantity flammable should be placed in designated flammable cabinets which was not observed during the time of the assessment. No evidence of spills or staining was observed. The materials observed do not appear to pose a hazard to the Subject Property, provided they continue to be used as designed, are properly handled, and all regulations regarding their use are followed. No further action or investigation is recommended regarding the use of hazardous substances or petroleum products at the Subject Property.

Photographs



Routine Maintenance Supplies



Routine Maintenance and Janitorial Supplies



Pool Chemicals



Pool Chemicals

6.1.2 Underground Storage Tanks (USTs)

No USTs were identified at the Subject Property.

At the time of the site assessment the adjoining property to the east was a Chevron gasoline station and Time Saver convenience store, which contained three USTs. Refer to Section [4.2](#) for additional information on the Chevron gasoline station and tanks associated.

6.1.3 Odors

At the time of the site assessment, olfactory evidence revealed strong odors typically associated with possible microbial growth that were found in multiple units throughout the Subject Property. Further olfactory evidence typically associated with sewage was observed in various units, most notably, down units. Refer to Section [8.3](#) for additional information.

6.1.4 Hazardous Substances and Petroleum Products (Not Identified Uses)

HAZARDOUS SUBSTANCE AND PETROLEUM PRODUCT CONTAINERS NOT IN CONNECTION WITH IDENTIFIED USES				
Substance	Approximate Quantity	Container	Location	Storage Condition
Apparent Gasoline	1	1-gallon can	Unit 104	Good: No leaks or spills
Apparent Gasoline	2	5-gallon cans	Unit 104 and Unit 241	Good: No leaks or spills

During the assessment, small red storage cans containing what appeared to be gasoline were identified in Units 104 and 241. The purpose of these containers was not documented or reported. Hazardous materials, such as gasoline, must either be stored in a designated flammable materials storage cabinet if they are actively used on the property, or they should be properly disposed of in accordance with regulations.

Photographs



Unit 241 Gas Can



Unit 104 Gas Cans

6.1.5 Transformers or PCB-Containing Equipment/Items

PCB CONTAINING ITEMS				
Type of Equipment	Year Installed	Location	Staining / Releases Identified	Suspected of Containing PCBs
14 small pad-mounted electrical transformers	Presuming 1973 - not specified	Scattered throughout Subject Property	Yes	✓
Large pad-mounted electrical transformer	Dated 2016	Across from the Office	No	

The Subject Property is supplied with underground electrical service from pad-mounted transformers. The transformers are designated as the property of [REDACTED], the public utility provider. Apparent leakage was observed from one pad-mounted transformer, between Buildings 14 and 16, where staining on the concrete pad and distressed vegetation surrounding it was present. No leakage of the other transformers was observed at the time of the site assessment.

Hydraulic fluid in equipment presents the potential of containing PCBs. The USEPA banned the manufacturing of PCB-containing hydraulic fluid in 1976, and the manufacturing of PCBs ceased in 1977. Typically, industrial equipment installed prior to 1978 is assumed to contain PCBs. The property was built in 1973. Although the larger transformer, had a manufacturer date of 2016 no manufacturer dates could be identified on the smaller transformers. The smaller transformers appeared older in nature.

MCC contacted [REDACTED] to determine if the smaller transformers on site are PCB containing. According to Mr. [REDACTED], the [REDACTED] with [REDACTED], the age of the transformer and history is not known. Mr. [REDACTED] was unaware if the transformer with staining and distressed vegetation contains PCBs. This represents a REC for the Subject Property. MCC recommends the identified release of dielectric fluid be reported to [REDACTED] and that [REDACTED] determine the manufacturing date and conduct appropriate response actions to remove the impacted concrete pad and any underlying impacted soil. If PCBs are present, MCC additionally recommends that post-excavation confirmatory soil samples be collected and analyzed for the presence of total petroleum hydrocarbons (TPH) and polychlorinated biphenyls (PCBs).

The remaining units should be periodically inspected for leakage. If leakage is visible, the property manager should contact the public utility.

No additional equipment with the potential to utilize dielectric or hydraulic fluid was observed as a result of the site assessment.

Photographs



Apparent Leaking Transformer



Apparent Leaking Transformer

6.1.6 Drains and Sumps

Visual observations identified storm water catch basins located throughout the Subject Property's paved areas. No spills or releases were identified.

6.1.7 Stressed Vegetation, Stained Soil, or Stained Pavement

Visual observation of the Subject Property identified evidence of distressed vegetation and staining around one pad-mounted transformer located between Buildings 14 and 16. Refer to Section [6.1.5](#) for further discussion. No other evidence of distressed vegetation, staining, or surface migration of releases onto or off of the Subject Property were observed.

Minor staining of the pavement areas was observed. The staining appeared to stem from typical vehicular usage. No concerns were identified.

6.1.8 Solid Waste and Water/Wastewater Discharge

Domestic sewage is disposed to the municipal sanitary sewer system. Municipal trash is stored in bins, and disposed of by a contracted waste hauler. Nuisance debris was identified in multiple units, and small amounts of miscellaneous debris were observed along the exteriors of the Subject Property. No hazardous materials or petroleum products were identified around the areas of debris.

Evidence of spills or staining was not observed in the areas of waste generation or pre-disposal storage. The concrete floors appeared intact, and no cracks were observed in the areas of waste generation or pre-disposal storage.

MCC observed adjacent properties from afar in regards to wastes operations. Trash containers, and dumpsters were observed. No apparent environmental concerns were identified in the areas of waste collection at the time of the assessment.

INTERVIEWS

The following persons were contacted for interviews by Moran Construction Consultants in an effort to obtain information regarding the current and historical occupants and uses of the Subject Property and surrounding properties.

Source	Name, Title, Organization	Interview Conducted	Comments
Property Owner	██████████, Property Manager, ██████████	✓	An interview with the current property manager, ██████████, was conducted during the site visit. He advised that to the best of his knowledge, there are no current or historical tanks or spills/releases present at the property.
Occupant	Apartment unit tenants	✓	During the course of the assessment, MCC interviewed a few apartment unit tenants to obtain any additional information on active moisture intrusion within their units. Refer to Section 8.4.

NON-SCOPE CONSIDERATIONS

In accordance with Moran Construction Consultants's scope of work for this project, the below-listed "non-scope considerations," as defined in ASTM E1527-21, were evaluated as part of this Phase I ESA.

8.1 - Asbestos-Containing Materials (ACMs)

Asbestos is a naturally-occurring mineral fiber that, because of its strength and heat resistance, has been used in a variety of building construction materials as a fire retardant and insulation. Asbestos-containing building materials are generally classified as friable or non-friable. Friable materials include materials that can be crumbled, pulverized, or reduced to powder by hand pressure, or by normal use or maintenance can be expected to emit asbestos fibers into the air. Non-friable materials are of particular concern when damaged by maintenance work, demolition, or other any other activity that renders the material friable.

Based on the age of the Subject Property, the potential for the presence of ACMs exists. MCC conducted a limited screening survey for the presence of ACM at the Subject Property. Friable suspect ACMs in the form of drywall, joint compound, and wall texture were observed in several areas in good to poor condition, and were sampled and tested for asbestos using Polarized Light Microscopy. Other suspect friable and non-friable ACMs were observed or have the potential to be present at the Subject Property. These items include, but are not limited to, insulation, caulking, window glazing, floor mastics, and HVAC duct connectors; however, due to either the conditions of the observed areas, or presence of tenants inhabiting the units, sampling was not performed on these items.

MCC collected 12 bulk samples of suspect materials. The samples taken were located in the leasing office and Unit 263. Both of these areas are located on the first floors of their respective buildings. The results, listed in the chart below, indicated that asbestos was not detected in the sampled materials. The samples taken were located within the leasing office and in down Unit 263, where the ceilings are 8-10' in height. After sampling was concluded, it was brought to MCC's attention that in [REDACTED], Hurricane [REDACTED] caused the water levels at the property to rise above the first floor ceilings and years later approximately five feet of flooding also occurred again for Hurricane [REDACTED]. It was not known if all drywall affected by the flooding was replaced after the hurricanes; however, it is assumed to have been replaced, as it is a typical good building practice to replace drywall after being affected by water intrusion. Additionally, plumbing and roof leaks were observed and reported where interior drywall replacement has been necessary on all floors. With the uncertainty of which the drywall was replaced, if at all, an extensive Asbestos Survey may reveal different results. Please note that the scope of work for this survey was limited to a sample of friable materials or damaged non-friable materials in a few accessible areas and that destructive sampling of undamaged non-friable materials was not conducted. Suspect ACM samples were submitted to [REDACTED] in [REDACTED], [REDACTED] for laboratory analysis by polarized light microscopy (PLM).

It should be noted that the limited visual screening survey conducted under the scope of work for the assessment does not constitute a full asbestos inspection, in which all areas of the buildings would have been thoroughly surveyed and sampled. The possibility exists for ACM to be present in areas not accessed or sampled by MCC personnel. Based on the limited scope of work of this assessment, additional suspect ACM may also be present in areas of the buildings that were accessed as part of this assessment.

Due to the continued distribution of a wide variety of asbestos-containing building materials, asbestos may be present in some of the roofing, flooring, floor mastics, HVAC duct connectors, wall and ceiling materials, caulking/putties, adhesives, window glazing, spackling compounds, and insulation materials, as well as other building materials that may be used at the Subject Property. Additional suspect ACM may be present in inaccessible areas, including, but not limited to, roofs, pipe chases behind solid walls and ceilings, concealed floor coverings, the interior of machinery or equipment, within pipe chases, or water and sewer systems. Sampling many of these materials requires techniques that may be destructive to subject facilities, and in the case of roofing material, may void warranties.

MCC recommends comprehensive testing and removal of damaged asbestos following state and local regulations. Additionally, MCC recommends that an asbestos inspection be performed in accordance with all applicable federal, state, and local regulatory requirements prior to renovation, demolition, or other activities that could cause a material disturbance. Any removal or disturbance of ACM or suspect ACM should be performed by properly trained personnel and in compliance with federal, state, and local regulations. MCC further recommends the implementation of an Asbestos Operations and Maintenance (O&M) Program. This O&M Plan provides the procedures and guidelines that, when used during facility cleaning, maintenance, and general operations, will minimize human exposure to asbestos fibers and minimize release of asbestos fibers to the environment. This O&M Plan is a long term management approach.

The following table presents the bulk samples of suspect ACM collected at the Subject Property:

Polarized Light Microscopy (PLM) Results

Sample #	Layer #	Location	Physical Description	Homogeneous Area (Y/N)	Asbestos Type/ Calibrated Visual Estimated %
1A	1A-1	Clubhouse - Maintenance Closet Wall	Wall Texture - Tan Surfaced White Compound	N	None Detected
1B	1B-1	Clubhouse - Restroom Wall	Wall Texture - Tan Surfaced White Compound	N	None Detected
1C	1C-1	Clubhouse - Storage Room Near Office	Wall Texture - Tan Surfaced White Compound	N	None Detected
	1C-2	Clubhouse - Storage Room Near Office	White Drywall with Paper	N	None Detected
1D	1D-1	Clubhouse - Restroom Ceiling	Ceiling Texture - Tan Textured Surfacing	N	None Detected

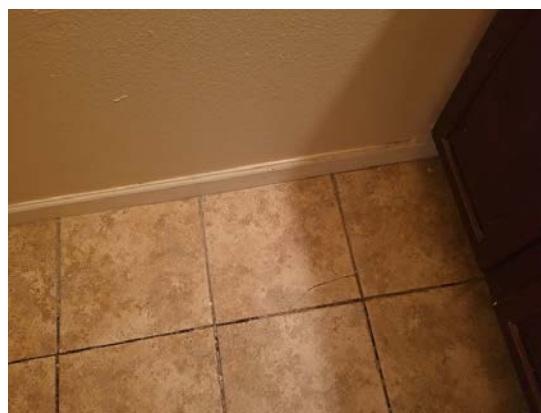
Sample #	Layer #	Location	Physical Description	Homogeneous Area (Y/N)	Asbestos Type/ Calibrated Visual Estimated %
1E	1E-1	Clubhouse - Front Storage Room Near Office Ceiling	Ceiling Texture - Tan Textured Surfacing	N	None Detected
1F	1F-1	Clubhouse - Maintenance Storage Room Ceiling	Ceiling Texture - Tan Textured Surfacing	N	None Detected
2A	2A-1	Unit 263 - Hallway Ceiling to Bedroom	Ceiling Texture - Tan Surfaced White Compound	N	None Detected
	2A-2	Unit 263 - Hallway Ceiling to Bedroom	White Drywall with Paper	N	None Detected
2B	2B-1	Unit 263 - Middle Bedroom Ceiling	Ceiling Texture - Tan Surfaced White Compound	N	None Detected
	2B-2	Unit 263 - Middle Bedroom Ceiling	White Drywall with Paper	N	None Detected
2C	2C-1	Unit 263 - Middle Bathroom Ceiling	Ceiling Texture - Tan Surfaced White Compound	N	None Detected
	2C-2	Unit 263 - Middle Bathroom Ceiling	White Compound Beneath Tape	N	None Detected
	2C-3	Unit 263 - Middle Bathroom Ceiling	White Drywall with Paper	N	None Detected
2D	2D-1	Unit 263 - Living Room Wall Behind Kitchen	Wall Texture - Tan Surfaced White Compound	N	None Detected
	2D-2	Unit 263 - Living Room Wall Behind Kitchen	White Drywall with Paper	N	None Detected

Sample #	Layer #	Location	Physical Description	Homogeneous Area (Y/N)	Asbestos Type/ Calibrated Visual Estimated %
2E	2E-1	Unit 263 - Middle Bathroom Wall	Wall Texture - Tan Surfaced White Compound	N	None Detected
	2E-2	Unit 263 - Middle Bathroom Wall	White Drywall with Paper	N	None Detected
2F	2F-1	Unit 263 - Middle Bedroom Wall	Wall Texture - Tan Surfaced White Compound	N	None Detected
	2F-2	Unit 263 - Middle Bedroom Wall	White Drywall with Paper	N	None Detected

Photographs



Caulking (Suspect ACM)



Ceramic Tile & Grout (Suspect ACM)

8.2 - Lead-Based Paint (LBP)

MCC evaluated the age of the Subject Property to determine whether it is pre-disposed to contain LBP, and if the presence of LBP is likely, made observations of the condition of painted surfaces. In the course of conducting observations for the presence of LBP, only representative accessible portions of the Subject Property improvements were inspected. In those observed portions, such observations were limited to representative areas that were readily accessible, easily visible, and safe with respect to the field observer. For this reason, MCC does not warrant that findings represent conditions in unobserved areas. The limited observations for LBP are not to be construed as an in-depth LBP survey.

Lead affects the majority of systems within the body. At high levels it can cause convulsions, coma, and even death. Lower levels of lead can adversely affect the brain, central nervous system, blood cells, and kidneys.

Old lead-based paint is the most significant source of lead exposure in the U.S. today. Most homes built before 1960 contain heavily leaded paint. Some homes built as recently as 1978 may also contain lead paint. This paint could be on window frames, walls, the outside of homes, or other surfaces. Harmful exposures to lead can be created when lead-based paint is improperly removed from surfaces by dry scraping, sanding, or open-flame burning.

In 1978, lead-based paint (LBP) was banned for residential use by the USEPA through the United States Department of Housing and Urban Development (HUD). However, the term LBP is applicable only to residential applications, and does not apply to commercial construction applications.

A previous investigation conducted by [REDACTED], LLC indicated that suspect LBP is suspected of being present based on the date of construction. [REDACTED] recommended that interior and exterior samples be obtained from the areas to be renovated, for LBP and other potential contaminant analyses and that the appropriate actions be taken based on the resulting analyses. [REDACTED] recommended a LBP operation and maintenance plan for the site, to be prepared and implemented.

Since the Subject Property was constructed prior to the Consumer Product Safety Commission's 1978 ban on the sale of LBP to consumers and the use of LBP in residences, there is a potential that LBP may have been applied at the Subject Property. Testing would be required in order to determine whether LBP exists. Painted surfaces observed within the rented units and common areas were in good, fair, and poor condition. Peeling and flaking was observed within multiple units along the interiors and exteriors of the Subject Property.

MCC recommends that all suspect damaged LBP be properly tested under a comprehensive LBP survey and all identified LBP be removed in accordance with all State and Local regulations. No further action, other than maintaining the suspect LBP under an O&M program, is recommended for the non-damaged areas in good condition with suspect LBP. All activities involving LBP should be conducted in accordance with the USEPA's Lead-Based Paint Renovation, Repair and Painting Program Rule, the OSHA Lead in Construction (CFR Part 1926.62), the EPA Renovate Right regulations, and RCRA guidelines.

8.3 - Lead In Drinking Water (LIW)

The major source of Lead in Drinking Water is the leaching of lead from household plumbing materials or water serviced lines used to bring water from the main to the building. Since 1986, the Safe Drinking Water Act (SDWA) has required that only "lead free" pipe, solder, or flux can be used in plumbing in residential or non-residential facilities providing water for human consumption. Properties built before 1986 are more likely to have lead pipes, fixtures and solder. The most common problem is with brass or chrome-plated brass faucets and fixtures which can leach significant amounts of lead into the water, especially hot water. Therefore, they are at a higher risk of having elevated lead levels in drinking water. Health concerns regarding lead in water are the same as they are for lead in paint.

Given the age of the buildings at the Subject Property, there is a potential presence of lead in the drinking water attributed to pipes, lead solder, or flux used in the plumbing. However, the assessment's scope did not include taking drinking water samples. To safeguard the integrity of the drinking water supply, MCC recommends performing targeted sampling and analysis to assess the potential presence of lead in the drinking water. This

effort will help assess the possible existence of lead within the drinking water system, considering both the historical construction date of the buildings and the potential utilization of lead-based materials in the plumbing infrastructure.

According to an online review of the [REDACTED] Annual Update and 2022 Consumer Confidence Report on Water Quality, the water that is supplied to the Project is within federal, state, and local drinking water quality standards.

8.4 - Microbial Growth

Excess moisture can lead to the proliferation of microbial growth on porous building materials, such as gypsum board, wall and ceiling insulation, and carpeting. Failure to control or mitigate moisture sources can transform these materials into breeding grounds for microorganisms. Various potential sources of moisture include rainwater and groundwater intrusion, condensation on cold surfaces, and building system water leaks (e.g., plumbing or HVAC system leaks, overflowing drains). Inadequate ventilation in areas like clothes dryers and shower stalls can also create conditions conducive to excessive moisture. Microbial growth may manifest as visible conditions (e.g., ceramic tile mortar in shower stalls) or remain concealed within wall cavities without any apparent external evidence.

Interior areas of the Subject Property buildings to which access was provided and in which building elements were readily observable were inspected for the presence of moisture and visible or olfactory evidence of microbial development. No disassembly of systems or building components or physical or invasive testing was performed. No observations were conducted within concealed locations (construction elements behind wall and ceiling finishes, and other building components, etc.). The scope of this assessment was limited to visual observations of accessible areas for microbial growth and water damaged materials and did not include the collection and laboratory analysis of bulk samples or air samples to confirm the presence of microbial elements.

In the course of conducting observations for the presence of microbial growth, only representative accessible portions of the Subject Property improvements were inspected. In those observed portions, MCC made representative observations of areas that are readily accessible, easily visible, and safe with respect to the field observer. For this reason, MCC does not warrant that findings represent conditions in unobserved areas. The limited observations for microbial growth are not to be construed as an in depth Microbial survey.

Although microbial growth is ubiquitous and may occur in a very short time span, an effort was made to identify conspicuous microbial growth in the areas surveyed. Evidence of water intrusion and microbial growth was observed within a majority of the observed units, both occupied and vacant/down units, as well as the common area laundry facilities. The observed microbial growth was present along the drywall ceilings and walls, insulation, within the cabinetry, and along the structural members of the buildings.

Evidence of water intrusion and microbial growth was observed within a majority of the observed units, both occupied and vacant/down units, as well as the common area laundry facilities. The observed microbial growth was present along the drywall ceilings and walls, insulation, within the cabinetry, and along the structural members of the buildings. The observed microbial growth appeared to have been sustained from water damage of a variety of sources, including roof leaks, plumbing leaks, condensate line leaks, and other forms of water intrusion events. Property management appeared to have repaired some of the issues; however, some areas of water intrusion remain active. Microbial growth remediation did not appear to be a standard practice at the Subject Property. Due to the apparent lack of property remediation, it is reasonable to assume that further

microbial is present in areas of the buildings that were covered and were unable to be observed. In addition to our observation efforts, [REDACTED] Owner, completed a questionnaire which indicated the presence of moisture intrusion.

MCC recommends a Mold assessment be completed at the property to determine the extent of the growth. Given the extent of affected areas at the Subject Property, MCC further recommends the implementation of a Mold Operation and Maintenance (O&M) Plan be prepared for the Subject Property. A Mold O&M Plan is intended for the owners, employees, and occupants of the Subject Property for their use in controlling the microbial growth and water damaged materials in the building. The O&M Plan provides procedures and guidelines, that used during facility cleaning, maintenance, and general operations, will minimize human exposure to mold and fungus and prevent mold growth due to water damage. A Mold O&M Plan is a long-term management approach and is intended to cover maintenance procedures related to microbial growth, mold, and water damage.

Photographs



Unit Apparent Microbial Growth



Unit Apparent Microbial Growth

8.5 - Radon

Radon is a naturally occurring odorless and colorless gas that results from the decay of radioactive materials potentially present in soil and bedrock. Radon breaks down (decays) into solid radioactive elements called *radon progeny* (such as polonium-218, polonium-214, and lead-214). Radon progeny can attach to dust and other particles and can be breathed into the lungs. As radon and radon progeny in the air break down, they give off alpha particles, a form of high-energy radiation that can damage the DNA inside the body's cells.

The USEPA guidance action level for annual exposure to radon in residential environments is 4 picoCuries per liter (pCi/L) of air. Private owners of commercial real estate are generally not subject to regulatory enforcement of this action level, but it is commonly used for comparison purposes to indicate whether further action at a building may be warranted. Additionally, it is essential to note that state and local regulations can vary.

The United States EPA has prepared a map to assist national, state, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three radon zones, with Zone 1 being those areas with the highest potential average predicted indoor radon concentration in residential dwellings exceeding the EPA Action Limit of 4.0 pCi/L. Zone 2 with moderate potential and average

indoor radon levels between 2 and 4 pCi/L. Last, Zone 3 with a low potential and average indoor radon levels less than 2 pCi/L. It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the EPA recommends site specific testing in order to determine radon levels at specific locations. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not requested as part of this assessment. Review of the USEPA's Radon Map for [REDACTED] in [REDACTED] indicated that the Subject Property is located in Zone 3, areas with a predicted average indoor radon screening level less than 2 picoCuries per liter (pCi/L) of air.

Based on the propensity and in accordance with the scope of work, radon sampling was not conducted as part of this assessment.

8.6 - Emerging Contaminants

Emerging Contaminants are some substances that non-environmental professionals and others may assume to be hazardous substances that are not defined (or not yet defined) as hazardous substances under CERCLA through interpretation by EPA regulations and the courts. These substances may include: (1) some substances that occur naturally or through biological digestion (for example, methane), and (2) substances about which human understanding is evolving (for example, per- and polyfluoroalkyl substances, also known as PFAS). These and any other emerging contaminants, where they are not identified as a hazardous substance by CERCLA, as interpreted by EPA regulations and the courts, are not included in the scope of this report.

Some of these substances may be considered a hazardous substance (or equivalent) under applicable state laws. In those instances, where a Phase I Environmental Site Assessment is performed to satisfy both federal and state requirements, or as directed by the user of the report, it is permissible to include analysis and/or discussion of these substances in the same manner as any other Non-Scope Consideration. If and when such emerging contaminants are defined to be a hazardous substance under CERCLA, as interpreted by EPA regulations and the courts, such substances shall be evaluated within the scope of this report.

Perfluoroalkyl and polyfluoroalkyl substances (PFAS) are a class of man-made chemicals that are widely used in industrial processes and in consumer products, including food contact surfaces (cookware, pizza boxes, fast food wrappers, etc.), polishes, waxes, paints, stain repellents, cleaning products, dust suppression for chrome plating, electronics manufacturing, oil and mining for enhanced recovery, and performance chemicals (hydraulic fluid, fuel additives, etc.). PFAS or PFA products are also used found in aqueous film forming foams (AFFF), which are used in firefighting and emergency response actions, industrial processes, landfills, and wastewater treatment effluent.

MCC utilized the Environmental Working Group (EWG) PFAS Contamination in the U.S. Map, https://www.ewg.org/interactive-maps/pfas_contamination/map/, to review for past use of the site as it relates to landfills and industrial activities. The public water system which served the Subject Property and vicinity, was not identified on the EWG Map for detection of PFAS. PFAS impacts to the subsurface of the subject property are not expected.

No PFAS-containing materials were observed on the Subject Property during the site reconnaissance.

Based on a review of this map, on-site reconnaissance, the historical use of the Subject Property, and surrounding area and a review of the regulatory database report, emerging contaminants such as PFAS compounds do not appear to be a concern associated with the Subject Property at this time.

REPORT INFORMATION

This report documents the methods and findings of the Phase I ESA performed in general conformance with 42 U.S.C. §9601(35)(B) – *Standards and Practices for All Appropriate Inquiries (AAI)*, and ASTM International – *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* E1527-21, the specific scope of work provided, and generally accepted industry standards. The purpose of the Phase I ESA is to identify “Recognized Environmental Conditions” (RECs), historical recognized environmental conditions (“HRECs”), and/or controlled recognized environmental conditions (“CRECs”) at the Subject Property and potential impacts from nearby facilities.

9.1 - Scope of Work

The scope of this Phase I ESA included:

- A review of the general site setting and condition, including known information regarding the regional and local geologic and hydrologic conditions.
- A review of information provided by the User. Copies of documents provided to Moran Construction Consultants by [REDACTED] are included in the appendices of this report.
- A review of regulatory agency records to obtain information regarding environmental conditions on or near the Subject Property. The records review included retaining the services of a commercial database firm (Environmental Risk Information Services) to provide a listing of publicly documented environmental records for the Subject Property and at nearby properties within a one-mile radius. A copy of this report is included in the appendices of this report.
- A review of available public agency records for information regarding environmental permits, violations, or incidents, and/or the status of enforcement actions. Copies of relevant documents obtained from agency files are included in the Agency Records appendix.
- A review of historical records for the Subject Property and adjacent properties to assess potential for environmental impairment. Historical records reviewed included historical aerial photographs, historical topographic maps, historical fire insurance maps (if available), and historical city directory files. Copies of these historical records are included in the appendices of this report.
- Interviews to help identify current and past Subject Property and adjoining property uses and occupants.
- Performance of a site reconnaissance to observe general conditions at the Subject Property and adjacent properties as they relate to potential environmental impacts. The purpose of the reconnaissance was to identify, to the extent possible, current uses and improvements at the Subject Property, past uses of the Subject Property, current uses of adjacent properties, and evidence of existing and/or historical hazardous materials use, disposal, storage, and release on the Subject Property and/or adjacent properties. Photographs representative of conditions at the time of the reconnaissance and the property assessment questionnaire completed by the Subject Property owner are included in the appendices of this report.
- Preparation of this Phase I ESA report, which documents the above activities, our findings and opinions as they pertain to the identification of RECs, and data gaps.

9.2 - Definitions

For the purpose of this report, and as defined by ASTM Standard E1527-21, a REC is, *“(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.”*

A CREC is a *“recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, activity and use limitations, or other property use limitations).”*

A HREC is *“a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the property to any controls (for example activity and use limitations or other property use limitations).”*

De minimis conditions are *“a condition related to a release 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 the appropriate governmental agencies.”*

Significant data gap is *“a data gap that affects the ability of the environmental professional to identify a recognized environmental condition.”*

Data gap is *“a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to, site reconnaissance and interviews.”*

9.3 - Reliance

This Phase I ESA report has been prepared solely for the benefit of [REDACTED], the User. Moran Construction Consultants has issued the Phase I ESA report to this entity and grants the right to rely on the report contents.

No third party, other than the User and its creditor, financial or insurance underwriter, shall have the right to rely on the Moran Construction Consultants opinions rendered in connection with the services without written consent. Any reliance shall be conditioned on the third party's agreement to be bound to the conditions and limitations included within this Phase I report under Section 9.4. It should be noted that Moran Construction Consultants consent to provide a right-to-rely on this Phase I ESA report is further subject to the User's approval.

9.4 - Limitations

This Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs, HRECs, and CRECs to be present at the Subject Property. Not every property warrants the same level of assessment. Consistent with good commercial or customary practice, the appropriate level of assessment was guided by the type of property subject to assessment and the information developed in the course of inquiry.

Additional services considered optional by ASTM Standard E1527-21, such as asbestos-containing building materials, biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, industrial hygiene, lead-based paint, lead in drinking water, mold, radon, and wetlands were not included in the scope of work, with the exception of limited screenings for asbestos-containing building materials, lead-based paint, lead in drinking water, microbial growth, radon, and wetlands. Additionally, per the request of the Client, limited asbestos sampling was performed.

The findings and conclusions presented in this Phase I ESA are the result of professional interpretation of the information collected at the time of this study. This Phase I ESA was not an exhaustive search of all available records. Moran Construction Consultants cannot “certify” or guarantee that the Subject Property is free of environmental impairment; no warranties regarding the environmental quality of the property are expressed or implied. Specific limitations to our conclusions as a result of information gaps or incomplete information are documented in this section of the report.

The findings of this report, to the best of our knowledge, are valid as of the date of this report. However, changes in the conditions of a property can occur with the passage of time, whether due to natural processes or the works of man on this or adjacent properties. In addition, changes in applicable or appropriate regulations and standards may occur, whether they result from legislation, from the broadening of knowledge, or from other reasons. Per the ASTM E1527-21 Standard (the Standard), a Phase I ESA completed less than 180 days prior to the date of acquisition of the Subject Property is presumed valid. A Phase I ESA for which the information was collected or updated within one year of the date of acquisition of the Subject Property may be used, provided that the report is updated within 180 days of the date of purchase or intended transaction. Per the Standard, if a Phase I ESA or Phase I ESA Update is not completed within 12 months of the information collected, a new Phase I ESA is required. A list of the applicable dates associated with this investigation are referenced in the Report Viability section of this Report.

Specified information contained in this report has been obtained from publicly available sources and other secondary sources of information. Although care has been taken in compiling this information, Moran Construction Consultants disclaims any and all liability for any errors, omissions, or inaccuracies in the data provided by third parties in such information and data.

The work was performed using the degree of care and skill ordinarily exercised under similar circumstances by environmental consultants practicing in this or similar localities at the time these services were provided. No other warranty or guarantee, expressed or implied, is made as to the findings, opinions, and conclusions included in this report.

9.5 - Exceptions & Deviations

In performance of this Phase I ESA, Moran Construction Consultants has not identified potential exceptions or deviations from the ASTM E1527-21 standard of practice except where noted.

9.6 - Terms & Conditions

No special terms and conditions were in effect for this report.

9.7 - Signature of Environmental Professional

MCC has performed a Phase I Environmental Site Assessment of the property located at [REDACTED], [REDACTED], and [REDACTED] in [REDACTED], [REDACTED] and is in conformance with the scope and limitations of the protocol and the limitations stated earlier in this report. Exceptions to or deletions from this protocol are discussed earlier in this report.

This Phase I Environmental Site Assessment was performed by the undersigned. Angie Ellis is an Environmental Professional as defined by the ASTM E1527-21 standard.

We declare, that to the best of our professional knowledge and belief, Angie Ellis meets the definition of Environmental Professional as defined in 40 CFR §312.10(b), and has the specific qualifications based on education, training, and experience to assess a property for the nature, history, and setting of the Subject Property. We have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Cameron Roussel
Associate Consultant



Angie Ellis
Senior Due Diligence Manager

REFERENCES

40 Code of Federal Regulations (CFR) Part 312 – Standards and Practices for All Appropriate Inquiries (AAI)

ASTM E1527-13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment"

ASTM E1527-21, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment"

10.1 - Environmental Database Report(s)

Environmental Risk Information Services, 11 September 2023, The Environmental Risk Information Services Database Report – [REDACTED]"

10.2 - Historical Resources

Environmental Risk Information Services, 11 September 2023, "Historical Aerial Report," [REDACTED]"

Environmental Risk Information Services, 11 September 2023, "City Directory Report," [REDACTED]"

Environmental Risk Information Services, 11 September 2023, "Fire Insurance Map Report," [REDACTED]"

Environmental Risk Information Services, 11 September 2023, "Historical Topographic Map Report," [REDACTED]"

10.3 - Physical Setting Information Sources

United States Geological Survey (USGS), 2020 USGS Topo: [REDACTED], [REDACTED]; [REDACTED], [REDACTED]: USGS 7.5 Minute Topographic Map.

United States Department of Agriculture, "Soil Survey of [REDACTED]," <http://websoilsurvey.nrcs.usda.gov>

10.4 - Previous Reports

[REDACTED], LLC., 17 April 2014, "Phase I Environmental Site Assessment of [REDACTED]"

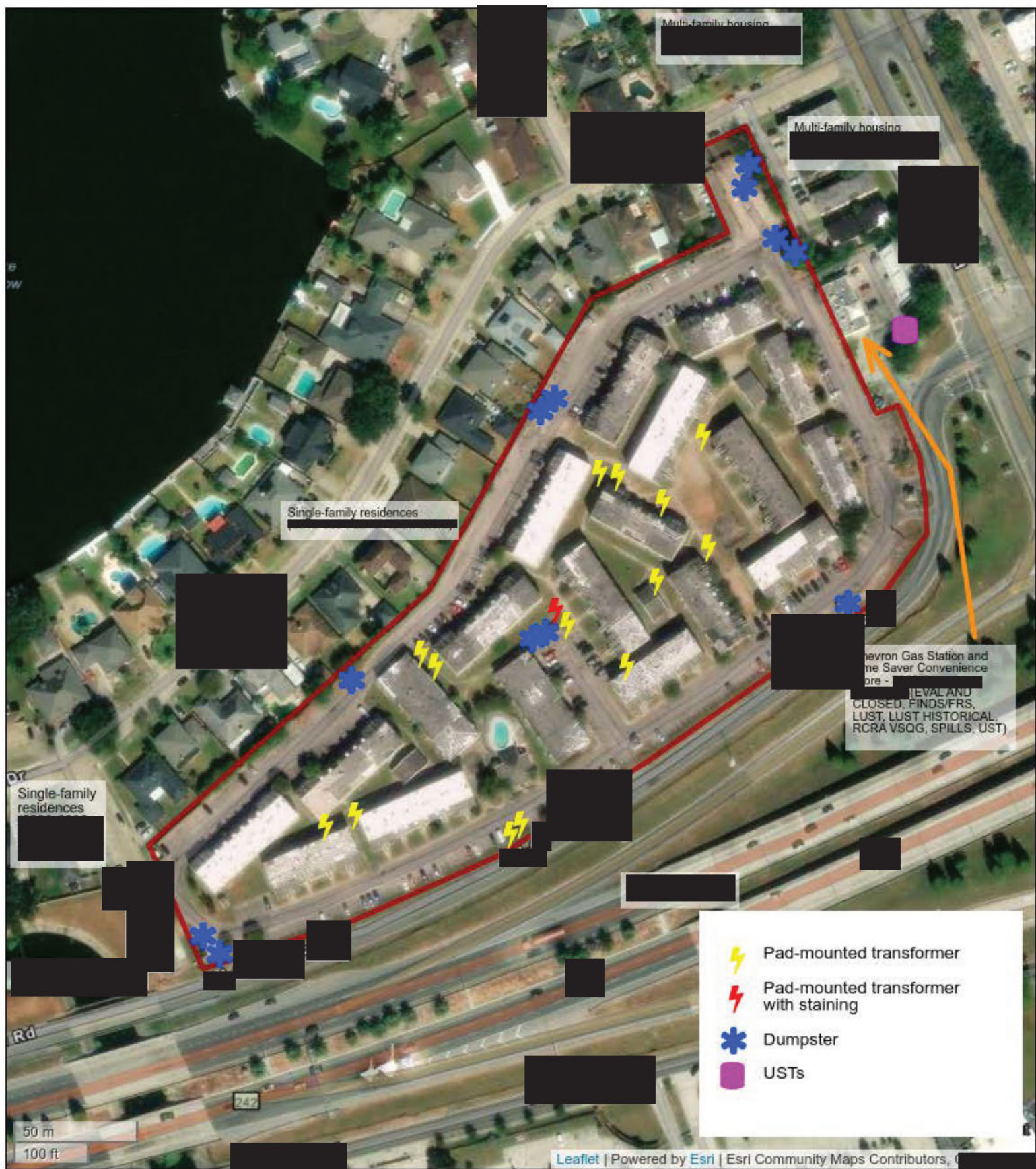
[REDACTED], LLC., 26 July 2022, "Property Condition Assessment, [REDACTED]"

Environmental Acronyms

Acronym	Definition
AAI	EPA All Appropriate Inquiries Rule
ACM	Asbestos-Containing Materials
APAR	Affected Property Assessment Report
AST	Above-Ground Storage Tank
BTEX	Benzene, Toluene, Ethylbenzene, and Total Xylenes (Gasoline Components)
CA	Corrective Action
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
COC	Chemical of Concern
DNAPL	Dense Non-Aqueous Phase Liquid
EDR	Environmental Database Resources
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment, Usually a Phase I
IHW	State Listed Industrial & Hazardous Waste Sites
LBP	Lead-Based Paint
LLPs	Landowner Liability Protections
LNAPL	Light Non-Aqueous Phase Liquid
LPST	Leaking Petroleum Storage Tank
MSD	Municipal Setting Designations
MTBE	Methyl Tert-Butyl Ether (Gasoline Additive)
NPL	National Priorities List
PAH	Polycyclic Aromatic Hydrocarbons
PCBs	Polychlorinated Biphenyls
PCL	Protective Concentration Level
Perc	Perchloroethylene (Dry Cleaning Solvent)
PSH	Phase-Separated Hydrocarbons/Floating Product
PST	Petroleum Storage Tank

Acronym	Definition
RAP	Response Action Plan
RBCA	Risk-Based Corrective Action
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
SPCC	Spill Prevention Control and Countermeasure Plan
SPLP	Synthetic Precipitation Leaching Procedure
SQG/LQG	Small Quantity Generator / Large Quantity Generator of Hazardous Waste
SWLF	Solid Waste Landfill
SWPPP	Storm Water Pollution Prevention Plans
TCLP	Toxicity Characteristic Leaching Procedure
TPH	Total Petroleum Hydrocarbons
TSDF	Treatment Storage Disposal Facilities
UST	Underground Storage Tank
VEC	Vapor Encroachment Condition
VI	Vapor Intrusion
VOC	Volatile Organic Compound

Figures

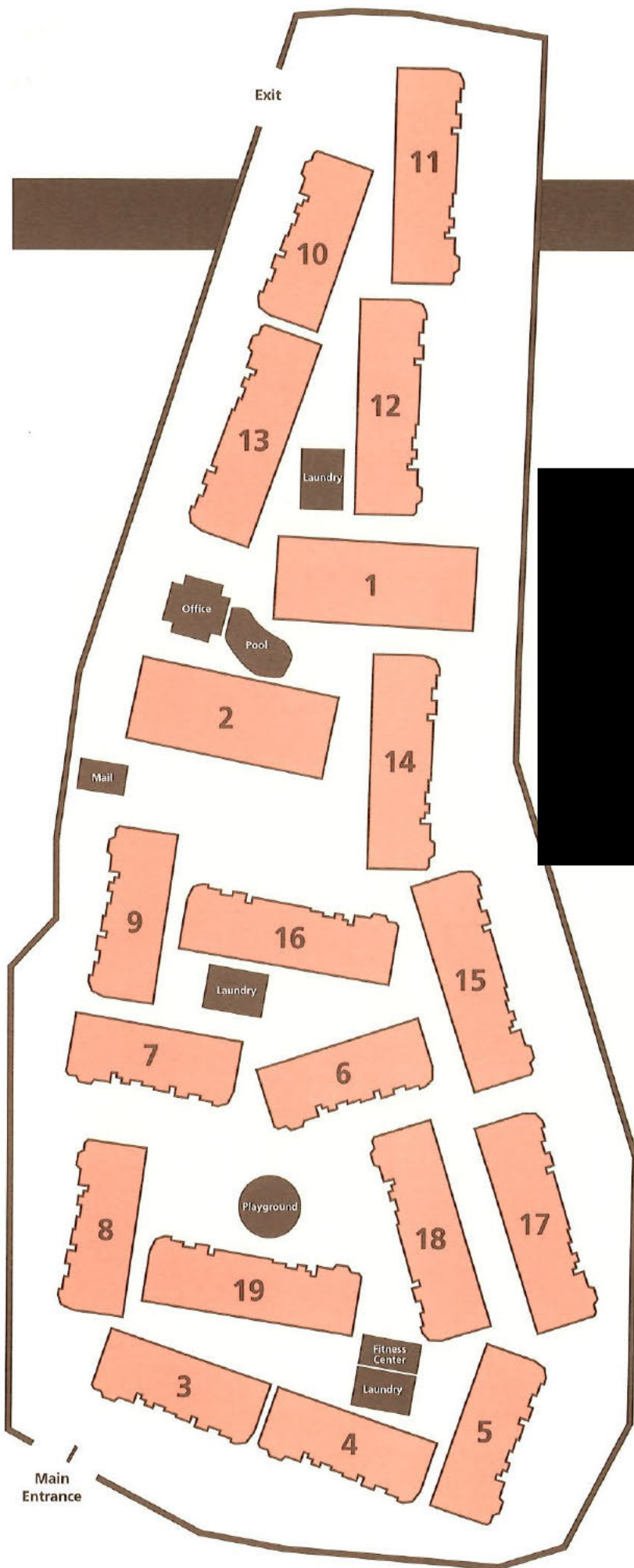


Field Sketch



User Provided Documents

SITE MAP



BUILDING ADDRESSES


BLDG 11

~~100 - 114~~


BLDG 16

~~209 - 223~~


BLDG 8

~~308 - 319~~


BLDG 12

115 - 129


BLDG 14

224 - 238


BLDG 3

320 - 327


BLDG 1

130 - 149


BLDG 15

239 - 253


BLDG 4

328 - 335


BLDG 10

150 - 161


BLDG 7

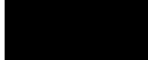
254 - 265


BLDG 5

336 - 347


BLDG 13

162 - 176


BLDG 6

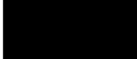
266 - 277


BLDG 17

348 - 362


BLDG 2

177 - 196


BLDG 18

278 - 292


BLDG 9

197 - 208


BLDG 19

293 - 307

Photographs

SITE PHOTOGRAPHS



Property West Overview



Property East Overview



Subject Property Partial North Elevation



Subject Property Partial East Elevation



Subject Property Partial South Elevation



Subject Property Partial West Elevation

SITE PHOTOGRAPHS



Leasing Office Front Elevation



Apartment Building Exterior



Apartment Building Exterior



Apartment Buildings' Exteriors



Apartment Building Exterior



Apartment Building Exterior

SITE PHOTOGRAPHS



Apartment Building Exterior



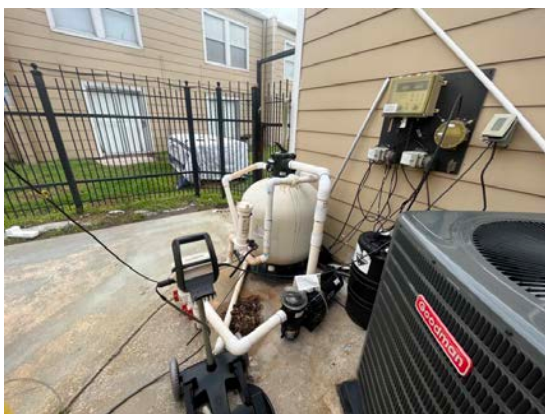
Apartment Building Exterior



Community Laundry Facility Exterior



Community Pool



Community Pool Equipment



Courtyard and Playground

SITE PHOTOGRAPHS



Transformer



Dumpster



Leasing Office Interior



Leasing Office Interior



Leasing Office Kitchen



Community Laundry Facility Interior

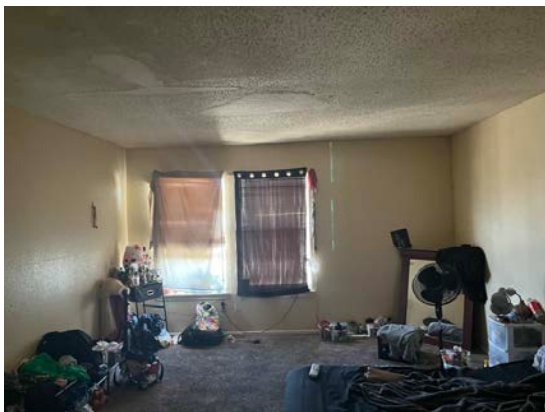
SITE PHOTOGRAPHS



Stairwell to Units



Down Unit 263



Unit Living Area



Unit Kitchen



Unit Bathroom



Unit Water Heater

SITE PHOTOGRAPHS



Unit Air Handler



Unit Apparent Microbial Growth



Unit Apparent Microbial Growth



Unit Apparent Microbial Growth



Unit 118 Microbial Growth



Unit 118 Microbial Growth

Database Report with Physical Setting Report

Historical Aerial Photographs



HISTORICAL AERIALS

Project Property:



Project No: 23329

Requested By: Moran Construction Consultants, LLC

Order No: 23083000136

Date Completed: September 11, 2023

Aerial Maps included in this report are produced by the sources listed above and are to be used for research purposes including a phase I report. Maps are not to be resold as commercial property. ERIS provides no warranty of accuracy or liability. The information contained in this report has been produced using aerial photos listed in above sources by ERIS Information Inc. (in the US) and ERIS Information Limited Partnership (in Canada), both doing business as 'ERIS'. The maps contained in this report do not purport to be and do not constitute a guarantee of the accuracy of the information contained herein. Although ERIS has endeavored to present information that is accurate, ERIS disclaims, any and all liability for any errors, omissions, or inaccuracies in such information and data, whether attributable to inadvertence, negligence or otherwise, and for any consequences arising therefrom. Liability on the part of ERIS is limited to the monetary value paid for this report.

Environmental Risk Information Services

A division of Glacier Media Inc.

1.866.517.5204 | info@erisinfo.com | erisinfo.com

Date	Source	Scale	Comments
1945	Army Corps of Engineers	1" = 500'	
1952	Army Mapping Service	1" = 500'	
1965	United States Geological Survey	1" = 500'	
1972	United States Geological Survey	1" = 500'	
1978	United States Geological Survey	1" = 500'	
1989	Army Corps of Engineers	1" = 500'	
1998	United States Geological Survey	1" = 500'	
2004	United States Geological Survey	1" = 500'	
2005	United States Department of Agriculture	1" = 500'	
2006	United States Department of Agriculture	1" = 500'	
2007	United States Department of Agriculture	1" = 500'	
2009	United States Department of Agriculture	1" = 500'	
2010	United States Department of Agriculture	1" = 500'	
2013	United States Department of Agriculture	1" = 500'	
2015	United States Department of Agriculture	1" = 500'	
2017	United States Department of Agriculture	1" = 500'	
2019	United States Department of Agriculture	1" = 500'	
2021	United States Department of Agriculture	1" = 500'	
2022	MAXAR TECHNOLOGIES	1" = 500'	

Environmental Risk Information Services

A division of Glacier Media Inc.

1.866.517.5204 | info@erisinfo.com | erisinfo.com

500
Feet



Year: 1945
Source: USACE
Scale: 1" = 500'
Comment:

Address: [REDACTED]
Approx Center: [REDACTED]

Order No: 23083000136



500
Feet



Year: 1952
Source: AMS
Scale: 1" = 500'
Comment:

Address: [REDACTED]
Approx Center: [REDACTED]

Order No: 23083000136



500
Feet



Year: 1965
Source: USGS
Scale: 1" = 500'
Comment:

Address: [REDACTED]
Approx Center: [REDACTED]

Order No: 23083000136



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Feet



Year: 1972
Source: USGS
Scale: 1" = 500'
Comment:

Address: [REDACTED]
Approx Center: [REDACTED]

Order No: 23083000136



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Feet



Year: 1978
Source: USGS
Scale: 1" = 500'
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Approx Center: [REDACTED]

Order No: 23083000136



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Scale: 1" = 500'
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Approx Center: [REDACTED]

Order No: 23083000136



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Approx Center: [REDACTED]

Order No: 23083000136



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Order No: 23083000136



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Feet



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Scale: 1" = 500'
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Order No: 23083000136



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Order No: 23083000136



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Order No: 23083000136



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Order No: 23083000136



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Order No: 23083000136



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Feet



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Approx Center: - [REDACTED]

Order No: 23083000136



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Feet



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Order No: 23083000136



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Feet



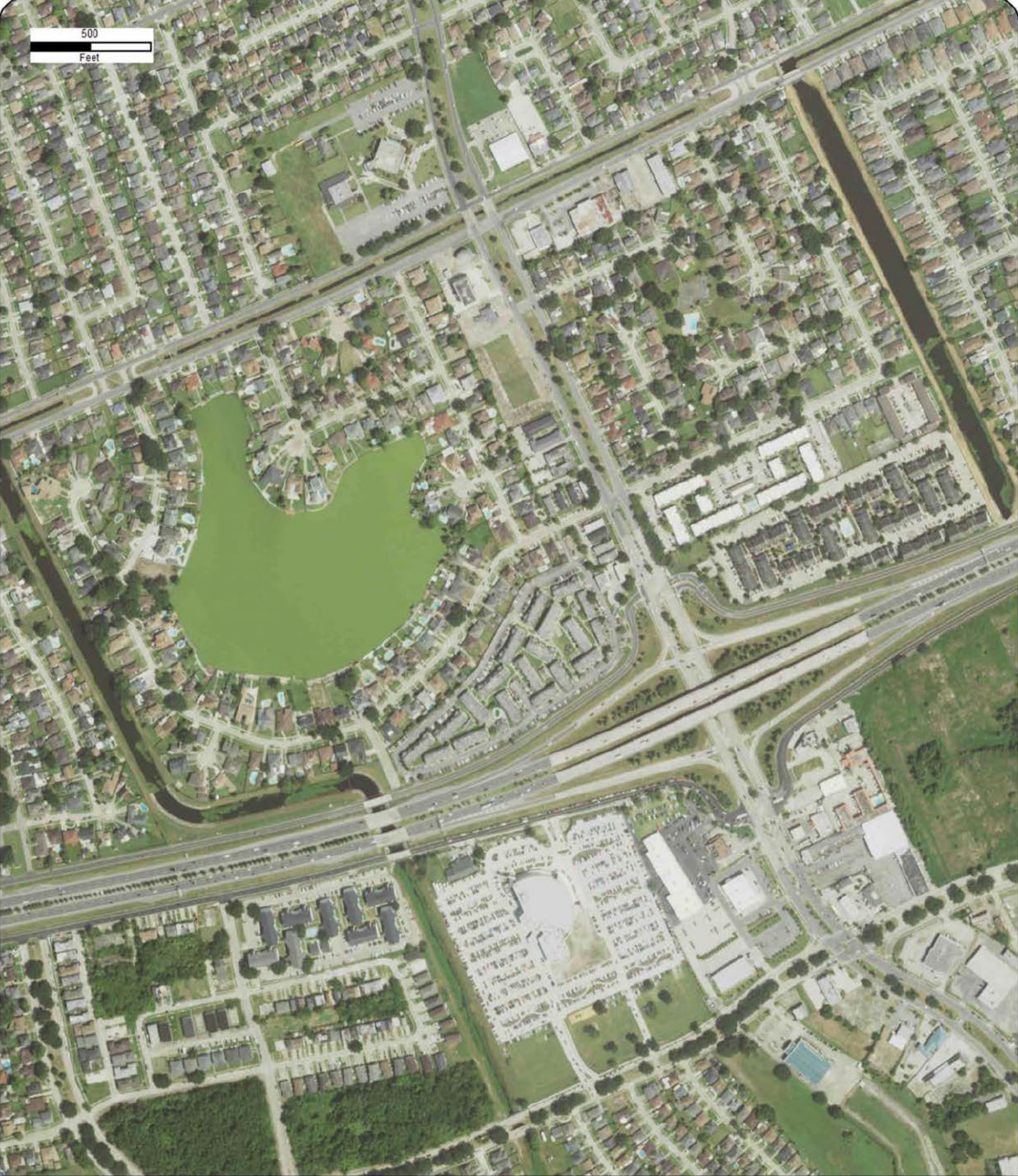
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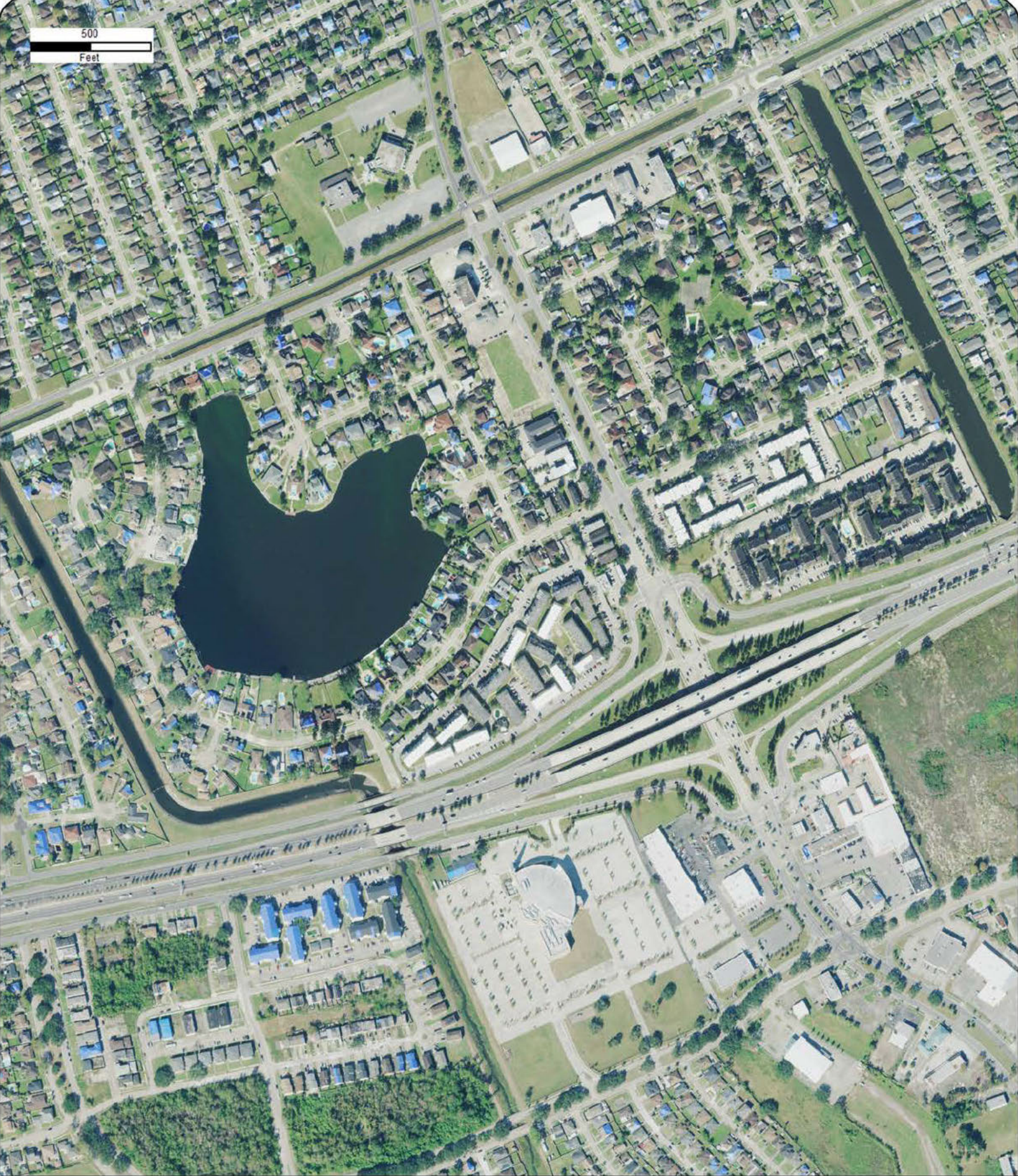


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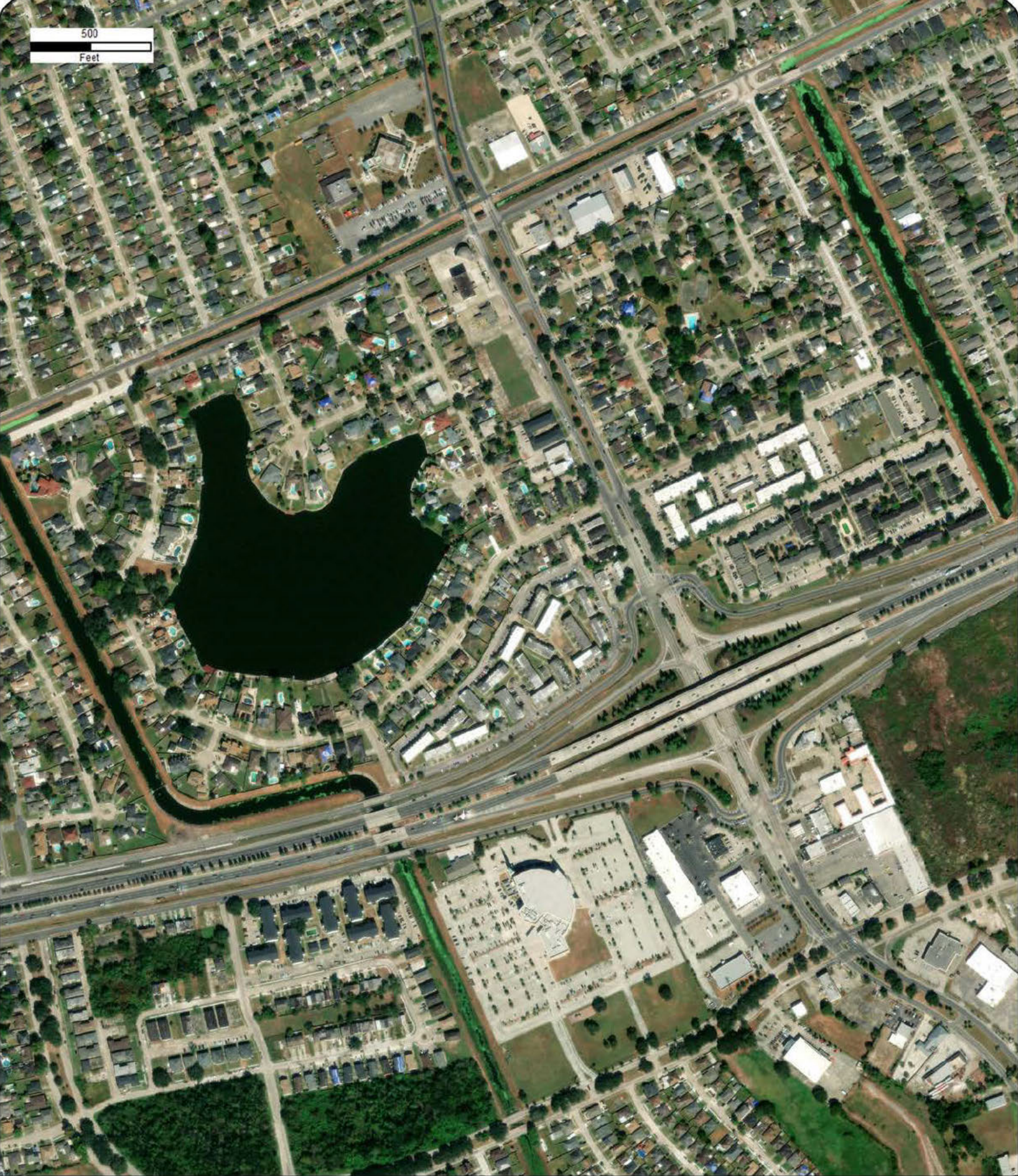
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Order No: 23083000136



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Feet



Year: 2022
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Order No: 23083000136



Historical Topographic Maps

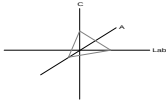
Fire Insurance Maps

City Directories

Questionnaires

Supporting Documents

**Dedicated to
Quality**



Materials Characterization - Bulk Asbestos Analysis

Laboratory Analysis Report - Polarized Light

Moran Construction Consultants

9432 Common Street
Baton Rouge, LA 70809

Attn: Angie Ellis

Customer Project: [REDACTED]
Reference #: CBR23097115

Date: 9/18/2023

Analysis and Method

Summary of polarizing light microscopy (PLM / Stereomicroscopy bulk asbestos analysis) using the methods described in 40CFR Part 763 Appendix E to Subpart E (Interim and EPA 600 / R-93 / 116 (Improved)). The sample is first viewed with the aid of stereomicroscopy. Numerous liquid slide preparations are created for analysis under the polarized microscope where identifications and quantifications are performed. Calibrated liquid refractive oils are used as liquid mounting medium. These oils are used for identification (dispersion staining). A calibrated visual estimation is reported, should any asbestiform mineral be present. Other techniques such as acid washing are used in conjunction with refractive oils for detection of smaller quantities of asbestos. All asbestos percentages are based on calibrated visual estimation traceable to NIST standards for regulated asbestos. Traceability to measurement and calibration is achieved by using known amounts and types of asbestos from standards where analyst and laboratory accuracy are measured. As little as 0.001% asbestos can be detected in favorable samples, while detection in unfavorable samples may approach the detection limit of 0.50% (well above the laboratory definition of trace).

Discussion

Vermiculite containing samples may have trace amounts of actinolite-tremolite, where not found by PLM should be analyzed using TEM methods and / or water separation techniques. Suspected actinolite/vermiculite presence will be indicated through the sample comment section of this report.

Fibrous talc containing samples may even contain a related asbestos fiber known as anthophyllite. Under certain conditions the same fiber may actually contain both talc and anthophyllite (a phenomenon called intergrowth). Again, TEM detection methods are recommended. [REDACTED] PLM report comments will denote suspected amounts of asbestiform anthophyllite with talc, where further analysis is recommended.

Some samples (floor tiles, surfacings, etc.) may contain fibers too small to be detectable by PLM analysis and should be analyzed by TEM bulk protocols.

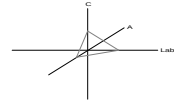
A "trace asbestos" will be reported if the analyst observes far less than 1% asbestos. [REDACTED] defines "trace asbestos" as a few fibers detected by the analyst in several preparations and will indicate as such under these circumstances.

Quantification of <1% will actually be reported as ≤1% (allowable variance close to 1% is high). Such results are ideal for point counting, and the technique is mandatory for friable samples (NESHAP, Nov. 1990 and clarification letter 8 May 1991) under 1% percent asbestos and the "trace asbestos". **In order to make all initial PLM reports issued from [REDACTED] NESHAP compliant, all <1% asbestos results (except floor tiles) will be point counted at no additional charge.**

Qualifications

[REDACTED] is accredited by the National Voluntary Accreditation Program (NVLAP) for selected test methods for airborne fiber analysis (TEM), and for bulk asbestos fiber analysis (PLM). All analysts have a college degree in a natural science (geology, biology, or environmental science) or are recognized by a state professional board in one of these disciplines. Extensive in-house training programs are used to augment education background of the analyst. The group leader of polarized light has received supplemental McCrone Research training for asbestos identification. This report is not covered by the scope of AIHA accreditation. Analysis performed at [REDACTED].

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Overview of Project Sample Material Containing Asbestos

Customer Project: [REDACTED] **Project #:** CBR23097115

Sample #	Layer #	Analysts	Physical Description of Subsample	Asbestos type / calibrated visual estimate percent	List of Affected Building Material Types
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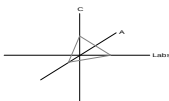
No Asbestos Detected.

Glossary of abbreviations (non-asbestos fibers and non-fibrous minerals):

ca - carbonate	pe - perlite	fg - fiberglass	pa - palygorskite (clay)
gypsum - gypsum	qu - quartz	mw - mineral wool	
bi - binder		wo - wollastinite	
or - organic		ta - talc	
ma - matrix		sy - synthetic	
mi - mica		ce - cellulose	
ve - vermiculite		br - brucite	
ot - other		ka - kaolin (clay)	

This report relates to the items tested. This report is not to be used by the customer to claim product certification, approval or endorsement by NVLAP, NIST, AIHA LAP, LLC, or any other agency of the federal government. This report may not be reproduced except in full without written permission from [REDACTED]. These results are submitted pursuant to [REDACTED] current terms and sale, condition of sale, including the company's standard warranty and limitations of liability provisions and no responsibility or liability is assumed for the manner in which the results are used or interpreted. Unless notified in writing to return the samples covered by this report, [REDACTED] will store the samples for a period of ninety (90) days before discarding. A shipping or handling fee may be assessed for the return of any samples.

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Polarized Light Asbestiform Materials Characterization

Customer Info: Attn: Angie Ellis
Moran Construction Consultants
9432 Common Street
Baton Rouge, LA 70809

Customer Project:

Project #:
CBR23097115

Phone # 337-418-1205
Fax #

Turnaround Time: 5 day

Date: 9/18/2023
Samples Received: 9/12/2023
Date Of Sampling: 9/5/2023
Purchase Order #: 23329

Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
1A		1A-1	Tan Surfaced White Compound	N	None Detected		100% qu, mi, bi, ca
1B		1B-1	Tan Surfaced White Compound	N	None Detected		100% qu, mi, bi, ca
2A		2A-1	Tan Surfaced White Compound	N	None Detected		100% qu, mi, bi, ca
		2A-2	White Drywall with Paper	N	None Detected	10% ce	90% qu, gy
2B		2B-1	Tan Surfaced White Compound	N	None Detected		100% qu, mi, bi, ca
		2B-2	White Drywall with Paper	N	None Detected	10% ce	90% qu, gy
2C		2C-1	Tan Surfaced White Compound	N	None Detected		100% qu, mi, bi, ca

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116)
Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion attaining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gypsum - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastinite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:

Sidney Pinkerton

Sidney Pinkerton
Analyst

Chris Williams

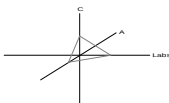
Senior Analyst
Alicia Stretz

Laboratory Director
Chris Williams

1. Fire Damage significant fiber damage - reported percentages reflect unaltered fibers
2. Fire Damage no significant fiber damages effecting fibrous percentages
3. Actinolite in association with Vermiculite
4. Layer not analyzed - attached to previous positive layer and contamination is suspected
5. Not enough sample to analyze

6. Anthophyllite in association with Fibrous Talc
7. Contamination suspected from other building materials
8. Favorable scenario for water separation on vermiculite for possible analysis by another method
9. < 1% Result point counted positive
10. TEM analysis suggested

**Dedicated to
Quality**



Polarized Light Asbestiform Materials Characterization

Customer Info: Attn: Angie Ellis
Moran Construction Consultants
9432 Common Street
Baton Rouge, LA 70809

Customer Project:

Project #:
CBR23097115

Phone # 337-418-1205
Fax #

Turnaround Time: 5 day

Date: 9/18/2023
Samples Received: 9/12/2023
Date Of Sampling: 9/5/2023
Purchase Order #: 23329

Sample #	Comment	Layer #	Analysts Physical Description of Subsample	Homo-geneous (Y/N)	Asbestos type / calibrated visual estimate percent	Non-asbestos fiber type / percent	Non-fibrous type / percent
White Compound Beneath							
2C-2	Tape			Y	None Detected		100% qu, mi, ca
2C-3	White Drywall with Paper			N	None Detected	10% ce	90% qu, gy
2D	2D-1 Tan Surfaced White Compound			N	None Detected		100% qu, mi, bi, ca
	2D-2 White Drywall with Paper			N	None Detected	10% ce	90% qu, gy
2E	2E-1 Tan Surfaced White Compound			N	None Detected		100% qu, mi, bi, ca
	2E-2 White Drywall with Paper			N	None Detected	10% ce	90% qu, gy
2F	2F-1 Tan Surfaced White Compound			N	None Detected		100% qu, mi, bi, ca

Analysis Method: Interim (40CFR Part 763 Appendix E to Subpart E) / Improved (EPA-600 / R-93/116)
Preparation Method: HCL acid washing for carbonate based samples, chemical reduction for organically bound components, oil immersion for identification of asbestos types by dispersion attaining / becke line method.

ca - carbonate	mi - mica	fg - fiberglass	ce - cellulose
gypsum - gypsum	ve - vermiculite	mw - mineral wool	br - brucite
bi - binder	ot - other	wo - wollastinite	ka - kaolin (clay)
or - organic	pe - perlite	ta - talc	pa - palygorskite (clay)
ma - matrix	qu - quartz	sy - synthetic	

Approved Signatories:

Sidney Pinkerton

Sidney Pinkerton
Analyst

Chris Williams

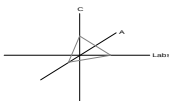
Senior Analyst
Alicia Stretz

Laboratory Director
Chris Williams

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			2F-2 White Drywall with Paper	N	None Detected	10% ce	90% qu, gy
1C			1C-1 Tan Surfaced White Compound	N	None Detected		100% qu, mi, bi, ca
			1C-2 White Drywall with Paper	N	None Detected	10% ce	90% qu, gy
1D			1D-1 Tan Textured Surfacing	N	None Detected		100% qu, mi, bi, ca
1E			1E-1 Tan Textured Surfacing	N	None Detected		100% qu, mi, bi, ca
1F			1F-1 Tan Textured Surfacing	N	None Detected		100% qu, mi, bi, ca

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Sidney Pinkerton
Analyst

Senior Analyst
Alicia Stretz

Laboratory Director
Chris Williams

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Resumes



CAMERON ROUSSEL

ASSOCIATE CONSULTANT

EDUCATION

**BACHELOR OF SCIENCE IN
ENGINEERING,
CONSTRUCTION
MANAGEMENT**

**LOUISIANA STATE
UNIVERSITY**

EXPERIENCE

**MORAN CONSTRUCTION
CONSULTANTS**
2022 THRU PRESENT

**WERCO BUILDING
SPECIALITIES, INC.**
2020 THRU 2022

PROFILE

Cameron is currently an associate consultant working alongside our consultants in performing Property Condition Assessments and Phase I Environmental Site Assessments, as well as Accessibility Audits, in our Due Diligence Division.

RESPONSIBILITIES

MORAN CONSTRUCTION CONSULTANTS
ASSOCIATE CONSULTANT

- Physical Needs Assessments
- Property Condition Assessment
- Capital Needs Assessment
- Depreciated Value Reporting
- Insurable Value Reporting
- Cost Consulting
- Replacement Reserve
- Stabilized Property Inspections and Reports
- Phase I Environmental Site Assessments
- Asbestos Surveys

CERTIFICATIONS

- TWIC badge owner
- Certified Occupational Safety Specialist
- OSHA 7845, 7505, & 510
- FAA Part 107 Certification for U.S. Commercial Drone Pilots
- Certified Asbestos Inspector in the State of Louisiana
- Environmental Site Assessment (ESA) Training



ANGIE ELLIS

SENIOR DUE DILIGENCE MANAGER

EDUCATION

M.B.A.

UNIVERSITY OF LOUISIANA
LAFAYETTE

BACHELOR OF SCIENCE

UNIVERSITY OF NEW
ORLEANS

EXPERIENCE

**MORAN CONSTRUCTION
CONSULTANTS**
2023 THRU PRESENT

CEG ASSESSMENTS
2004 THRU 2023

PROFILE

With over 19 years of ESA and PCA experience, Angie has managed and conducted environmental, and engineering services for real estate planning, including Reserve Studies, Phase I Environmental Site Assessments (ESAs) with environmental sampling (Radon, Lead Paint, Lead in Water, and Asbestos), Asbestos Inspections, Property Condition Assessments (PCAs), Property Condition Reports (PCRs) and Capital Needs Assessments (CNAs) for clients nationwide.

RESPONSIBILITIES

MORAN CONSTRUCTION CONSULTANTS
CONSULTANT

- Physical Needs Assessments
- Property Condition Assessment
- Capital Needs Assessment
- Environmental Site Assessment
- Depreciated Value Reporting
- Insurable Value Reporting
- Cost Consulting
- Replacement Reserve

CERTIFICATIONS

- Registered Environmental Manager (REM)
- Certified Environmental Scientist (CES)
- Environmental Professional (EP)
- Phase 1 Environmental Site Assessment Training
- Vapor Encroachment based on E2600
- PCA Training
- PCA HUD Training
- Lead Based Paint Inspector & Risk Assessor
- XRF Lead Paint Inspection System Factor Training
- Lead Hazard Control Visual Assessment Course
- Asbestos Inspector Certificate