PHASE I ENVIRONMENTAL SITE ASSESSMENT

of an

UNDEVELOPED PROPERTY APN 339-200-080 NORTHEAST CORNER (NEC) OF BEREA ROAD AND HEROES COURT MENIFEE, CALIFORNIA 92584

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PHASE I ESA EXECUTIVE SUMMARY OVERVIEW Undeveloped Property

APN 339-200-080, NEC of Bere	A ROAD & HEROES	COURT, MENIFEE, (CA
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Section Topic	No RECs Identified	Non-REC Issue Identified	RECs Identified	Phase II Recommended	Comments
Historical Usage	•				The subject property has been undeveloped land since at least 1938 to the present.
Regulatory Database Review (on-site)	~				
Regulatory Database Review (nearby sites)	•				
On-site Operations	•				
Haz. Mat. Handling	~				
Haz. Waste Handling	~				
USTs/ ASTs	•				
ACMs	•				
LBP/ Lead in H2O	~				
PCBs	•				
Radon	•				
Other	~				

SECTION I. EXECUTIVE SUMMARY & RECOMMENDATIONS

South Shore Testing & Environmental, Inc. (South Shore) was retained by Mr. Rich Wilson of Trademark Construction Co., Inc. (Client) to perform a Phase I Environmental Site Assessment (Phase I ESA or Assessment) of a site located at the northeast corner of Berea Road and Heroes Court in Menifee, California. The site visit was performed by the person whose signature appears in first position on the signature page (Section X of this report). At the time of the April 2, 2020 site visit, the subject property consisted of a total of approximately 10-acres of undeveloped land. The subject property is located on the north side of Heroes Court at the northeast corner of the intersection of Berea Court and Heroes Court, within a commercial and residential area.

This Phase I ESA was performed in general accordance with the scope and limitations of the *American Society for Testing and Materials (ASTM) Phase I ESA Standard E1527-2013* (equivalent to the USEPA's All Appropriate Inquiry [AAI] Standard), the scope of work defined in this report, as well as the signed service agreement. Exceptions or deviations from the standard are typically expressed as data gaps, data failure or limitations, which are primarily discussed in Sections II and IV-H. The following summarizes South Shore's independent conclusions and best professional judgment based upon information available to us during the course of this Assessment.

Based upon the limited site reconnaissance, historical review, regulatory records review, and other information detailed within this report, this Assessment identified the following evidence of ASTM Recognized Environmental Conditions (RECs) or other issues in connection with the subject property:

• Based upon the site reconnaissance, historical review, regulatory records review, and other information detailed within this report, this Assessment identified no obvious evidence of Recognized Environmental Conditions (RECs), Controlled RECs or Historic RECs in connection with the subject property. No further investigation is recommended.

An Executive Summary Overview is also included in the previous section. However, when making any decisions concerning the findings of this Assessment, please also refer to the remainder of this report, which may present other items of interest that are not discussed in the Executive Summary, or further details regarding the above items. In addition, please refer to the Data Gaps section (IV-H) of this report regarding information that may have been unavailable or incomplete which may have a bearing on the findings or usage of this report.

SECTION II. SCOPE OF WORK & LIMITATIONS

PURPOSE

This Phase I Environmental Site Assessment is intended to assist the client regarding one of the requirements for the "innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability" (42 U.S.C.§9601 et seq). Qualification for these limitations is predicated on the assumption that "...the defendant must have undertaken, at the time of acquisition, all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice in an effort to minimize liability...." However, no warranty is made that this report constitutes all appropriate inquiry since numerous other factors, including user responsibilities, are required.

PROTOCOL

The American Society for Testing and Materials (ASTM) Phase I ESA Standard E1527-2013 is the most current method used in attempting to perform the due diligence required to achieve the above purpose. The E1527-2013 Standard Practice was created by the ASTM "...in an effort to define good commercial and customary practice in the United States of America for conducting an environmental site assessment...." and is equivalent to the USEPA's All Appropriate Inquiry [AAI] Standard issued November 1, 2005. The ASTM Standard E1527-2013 is intended to identify recognized environmental conditions (RECs) in connection with a given property. The term recognized environmental conditions is not intended to include "de minimus" conditions that generally do not present a material risk of harm and that are unlikely to be the subject of enforcement actions by governmental agencies.

SCOPE OF WORK

Generally utilizing ASTM Standard Practice E1527-2013, as well as the scope of work discussed below and in the signed work authorization document (including all conditions and limitations therein), this Assessment involved: A site reconnaissance of the subject property, limited observations of adjoining properties, a review of the historical usage of the subject property, and a review of readily available relevant documentation provided by various public and private sources (including the client and/or owner of the subject property) to identify conditions indicative of releases or threatened releases of hazardous substances, as defined in CERCLA Section 101 (14) U.S.C. § 312.1(c) to evaluate the presence or likely existence of:

◆ Recognized environmental conditions, specified by ASTM E1527-2013 as: "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to a release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions."

◆ A brief and general evaluation of limited other potential environmental issues, including: suspect asbestos-containing materials, lead-based paint, polychlorinated bi-phenyls, and radon gas. No lab analyses, quantification, or indepth observations or discussion will be performed.

LIMITATIONS

In addition to the limitations described in this report, it is also subject to the terms and conditions of the service agreement with the Client, and related engagement or subsequently provided information, if applicable. As discussed in ASTM E1527-2013, no Phase I ESA can eliminate uncertainty regarding the potential for RECs in connection with a property. This investigation is simply intended to reduce uncertainty within reasonable limits of time and cost.

Refer to Section VI-A for a brief discussion of some (but not necessarily all) specific limitations to South Shore's subject property observations at the time of the site visit. The observations contained within this Assessment are based upon conditions readily observable during the site visit. These observations are typically unable to address conditions of areas not inspected, hidden from view, subsurface soil, groundwater, soil vapor, USTs, neighboring properties, and the like, unless specifically mentioned. It is not the purpose of this Assessment to determine the actual presence, or extent of contamination (if any) at the subject property. Unless specifically noted within this report, this Assessment does not include evaluation, observations, testing, or sampling to address groundwater, soil, or extraneous materials contamination (including mold and/or bio-hazardous/medical waste issues) in or on South Shore is not providing geological interpretations or the subject property. recommendations. Potential Vapor Intrusion issues from on or off-site sources are not evaluated. Electromagnetic issues (e.g., high-voltage power lines) or radiologic issues (e.g., X-ray usage, other radiation emitting items) are also not included. This Assessment does not include or address reasonably ascertainable environmental liens recorded against the subject property, unless stated. A regulatory compliance audit or health and safety review are not included.

South Shore makes no warranties or guarantees as to the accuracy or completeness of information obtained from or compiled by others. Information may also exist which was beyond the scope of this investigation, or was not provided to South Shore that may have an impact on the conclusions of this Assessment. This Assessment does not attempt to address past or forecast future site conditions. South Shore also cannot forecast or be responsible for changes in regulatory guidelines or protocols, industry standards or the like, which may affect the conclusions and/or future usage of this report.

This Assessment has been conducted and prepared in accordance with generally accepted practices and procedures exercised by reputable professionals under similar circumstances. South Shore makes no other warranties or guarantees, either expressed or implied, as to the findings, opinions, or recommendations contained in the report, or as to the existence or non-existence of RECs or other issues at the subject property.

SECTION III. GENERAL SITE DESCRIPTION

South Shore Testing & Environmental, Inc. (South Shore) was retained by Mr. Rich Wilson of Trademark Construction Co., Inc. (Client) to perform a Phase I Environmental Site Assessment (Phase I ESA or Assessment) of a site located at the northeast corner of Berea Road and Heroes Court in Menifee, California. The site visit was performed by the person whose signature appears in first position on the signature page (Section X of this report). At the time of the April 2, 2020 site visit, the subject property consisted of a total of approximately 10-acres of undeveloped land.

The subject property is located on the north side of Heroes Court at the northeast corner of the intersection of Berea Court and Heroes Court, within a commercial and residential area. The subject property location is shown on various Figures in the appendix.

During the site visit, which was performed by public access methods, the South Shore Assessor was unaccompanied. However, the Key Site Manager was notified in advance of the visit and permission for site access was granted to South Shore.

Mr. Richard D. Wilson, CEO of Boulders Menifee LLC, was identified as the "Key Site Manager." As defined by ASTM E1527-2013, the Key Site Manager is that person having good knowledge of the uses and physical characteristics of the subject property, and in a position to provide reasonably accurate information for the Key Site Manager Environmental Questionnaire (and this person may or may not be the property owner). Mr. Wilson completed the Key Site Manager Environmental Questionnaire subsequent to the site visit. A copy of the questionnaire is included in the appendix of this report. No RECs were identified as a result of the questionnaire review.

A. CLIENT PROVIDED INFORMATION

As discussed in ASTM E1527-2013, the User (e.g., Client) is required to perform certain tasks or provide certain information to South Shore in order to identify potential RECs. Tasks or information to be provided by the Client/User include: 1) review of judicial and title records for environmental liens, environmental deed restrictions or activity and use limitations (AULs); 2) provide specialized, actual, commonly known or reasonably ascertainable knowledge regarding the property; and, 3) identify reasons for a significantly lower purchase price (if applicable).

The Client or Key Site Manager (as applicable) has not provided or reported to South Shore any information which indicates the subject property is being sold, purchased or valued at a significantly reduced price due to outstanding environmental issues. Nor has the Client or Key Site Manager provided or reported to South Shore information indicating a specific knowledge of RECs, historic RECs, Environmental Liens, Activity and Use Limitations, or Environmental Deed Restrictions related to the subject property.

However, South Shore was not privy to the original purchase price versus valuation metrics of the property by the current owner or seller (as applicable), and therefore cannot evaluate this parameter. The Client/User of this report may wish to perform such an evaluation.

In addition, no previous environmental documentation (Phase I ESAs, Phase II ESAs, etc.) concerning the subject property was provided to South Shore or reported to exist by the Client or Key Site Manager. It is possible information contained in prior reports (if any) could change South Shore's conclusions or recommendations herein. If previous environmental documentation becomes available to the Client or subject property owner, a copy should be provided to South Shore for review. South Shore reserves the right to alter its conclusions herein based upon such new information.

B. ADJOINING AND ADJACENT PROPERTIES

As discussed in ASTM E1527-2013, an adjoining property is any real property whose border is contiguous or partially contiguous with the subject property, or would be if the properties were not separated by a roadway, street or other public thoroughfare.

Specifically, the subject property is bordered by the following:

North	Immediately by a concrete flood control channel, then by single-family
	residential-use properties followed by Dorval Court.
East	Immediately by single-family residential-use properties and Harzburg Road,
	then by Edina Road.
South	Immediately by Heroes Court, then by Spirit Park.
West	Immediately by Berea Road, then by Champion RV & Boat Self Storage at
	29985 Berea Road.

C. USGS TOPOGRAPHIC MAP

The subject property's physical setting was researched employing a United States Geological Survey (USGS) 7.5 Minute Topographic Quadrangle (Quad) Map relevant to the subject property. The USGS 7.5 Minute Quad Map has an approximate scale of 1 inch to 2,000 feet, and shows physical features such as wetlands, roadways, mines, and buildings. The USGS 7.5 Minute Quad Map was used as the Standard Physical Setting Source, and is sufficient as a single reference. A copy is included in the appendix.

The Romoland, California Quad Map (dated 2012) shows no physical features that are likely to environmentally impact the subject property. The subject property is identified as undeveloped land. No mines, wells, aboveground storage tanks, or wetlands were depicted in the immediate area of the subject property. The elevation of the subject property is approximately 1,412 feet above mean sea level with a slight topographic gradient to the southeast.

D. GENERAL HYDROGEOLOGIC CHARACTERISTICS

The general area of the subject property is located near the Perris Valley, which is located in the northern part of the Peninsular Ranges Province and located within the central part of the Perris Block between the Elsinore and San Jacinto fault zones. The geologic unit mapped within the area of the subject property consists of early Pleistocene very old alluvial-fan deposits comprised of well-dissected, well-indurated reddish-brown sand deposits.

Although site-specific groundwater information for the subject property was unavailable, according to information obtained from the State Water Resources Control Board's on-line GeoTracker database (www.geotracker.swrcb.ca.gov), the closest LUST site with available on-line groundwater data (24610 Railroad Canyon Road in Canyon Lake, CA, located approximately 1.25 miles to the southwest) indicates a reported depth to first groundwater of between approximately 13.6 and 15.6 feet below ground surface. The available on-line data also indicates a general southwesterly direction of groundwater flow at that site. However, local groundwater can be influenced by several factors, and may not conform to the reported nearby pattern. Shallower groundwater zones may also occur. Please note that South Shore is not providing geological interpretation or recommendations in this Assessment.

SECTION IV. HISTORICAL REVIEW

The site historical review is used to develop an understanding of the previous uses of the subject property and surrounding area in an effort to identify the likelihood of past uses, or activities having environmentally impacted, the subject property. The historical review consisted of a search of various public and private Standard Historical Sources, as detailed in the sections below.

As defined by ASTM E1527-2013, a Standard Historical Source is considered complete if the information contained within the source identifies all uses of the subject property from the time the property was first used for residential, agricultural, commercial, industrial or governmental purposes. Ideally, the information should be available in either five-year intervals or site milestone events (i.e., initial construction activities, demolition activities, etc.). However, available public and private historical sources do not always fulfill this goal, in which case, the closest approximation is made based upon the sources readily available at the time of historical review.

Historical Review Summary: From the historical information review discussed below, South Shore concludes that the subject property was undeveloped land from at least 1938 until the present. Most of the neighboring properties were also structurally developed during the 1990s, 2000s, and the 2010s with residential and commercial structures. Prior to the late 1990s, most of the neighboring properties were undeveloped land. No dry cleaners, gasoline stations, major landfills, military bases, manufacturing facilities, or heavy industrial businesses were identified on the subject property.

A. AERIAL PHOTOGRAPH REVIEW

Aerial photographs were reviewed to evaluate past land-use patterns of the subject property and vicinity. The photos were supplied by Environmental Data Resources, Inc. Copies of representative aerial photographs are included in the Site Maps appendix. This review revealed the following:

- 1938: The subject property is undeveloped land and granite rock outcroppings are located in the south-central portion of the subject property. One unimproved road trends from the southwest property corner to the eastern property line. North: immediately and further by undeveloped land. East: immediately and further by undeveloped land. South: immediately by Newport Road, then by undeveloped land. West: immediately and further by undeveloped land.
- 1949: The subject property is undeveloped land and granite rock outcroppings are located in the south-central portion of the subject property. One unimproved road trends along the southern property line. North: immediately and further by undeveloped land. East: immediately and further by undeveloped land. South: immediately by Newport Road, then by undeveloped land followed by a residence. West: immediately and further by undeveloped land.

- 1953: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph. The northwest half of the subject property has been mowed.
- 1961: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph. The northwest half of the subject property has been mowed.
- 1967: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph. The northwest half of the subject property has been mowed.
- 1974: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph. The northwest half of the subject property has been mowed.
- 1978: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph. The northwest half of the subject property has been mowed.
- 1985: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph. The northwest half of the subject property has been mowed.
- 1989: The subject property is undeveloped land. The majority of the subject property has been mowed and granite rock outcroppings are located in the south-central portion of the subject property. North: immediately and further by undeveloped land. East: immediately and further by undeveloped land. South: immediately by Newport Road, then by undeveloped land followed by a residence. West: immediately by undeveloped land, then by a residential-use property.
- 1994: The subject property is undeveloped land with several unimproved roads onsite and granite rock outcroppings located in the south-central portion of the subject property. North: immediately by a concrete storm drain channel, then by single-family residential-use properties. East: immediately by single-family residential-use properties and Harzburg Road, then by Edina Road. South: immediately by Newport Road and undeveloped land, then by undeveloped land and a residence. West: immediately by undeveloped land, then by a residential-use property.
- 1997: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph, with the exception of somewhat greater development in the general area.

- 2002: The subject property is undeveloped land with several unimproved roads onsite and granite rock outcroppings located in the south-central portion of the subject property. North: immediately by a concrete storm drain channel, then by single-family residential-use properties. East: immediately by single-family residential-use properties and Harzburg Road, then by Edina Road. South: immediately by Newport Road and undeveloped land, then by undeveloped land and a residence. West: immediately by Berea Road, then by a commercial-use property and undeveloped land.
- 2006: The subject property is undeveloped land with several unimproved roads onsite and granite rock outcroppings located in the south-central portion of the subject property. North: immediately by a concrete storm drain channel, then by single-family residential-use properties. East: immediately by single-family residential-use properties and Harzburg Road, then by Edina Road. South: immediately by Newport Road and undeveloped land, then by graded land and undeveloped land. West: immediately by Berea Road, then by a commercial-use property and undeveloped land.
- 2009: The subject property is undeveloped land with several unimproved roads onsite and granite rock outcroppings located in the south-central portion of the subject property. North: immediately by a concrete storm drain channel, then by single-family residential-use properties. East: immediately by single-family residential-use properties and Harzburg Road, then by Edina Road. South: immediately by Berea Road and undeveloped land, then by graded land and Newport Road. West: immediately by Berea Road, then by a commercial-use property.
- 2012: Conditions at the subject property and the adjoining properties appear similar to those observed in the previous aerial photograph, with the exception of somewhat greater development in the general area.
- 2016: The subject property is undeveloped land with several unimproved roads onsite and granite rock outcroppings located in the south-central portion of the subject property. North: immediately by a concrete storm drain channel, then by single-family residential-use properties. East: immediately by single-family residential-use properties and Harzburg Road, then by Edina Road. South: immediately by Heroes Court and Spirit Park, undeveloped land, and Newport Road, then by graded residential lots and undeveloped land. West: immediately by Berea Road, then by a commercial-use property.

B. BUILDING PERMIT REVIEW

No building permit information was located during this Assessment because no addresses are associated with the subject property six tax parcels. No past demolition or underground storage tank (UST) permits for the subject property were located as a result of this search.

In a further effort to evaluate the development history of the subject property, South Shore reviewed Riverside County Assessor's (RCA) information obtained from the RCA's website. Review of this information indicated the Assessor's Parcel Numbers for the subject property are 339-200-080; the parcel consists of approximately 10 acres; and the Property Type/Use Code is identified as Residential. No other information significant to this report was obtained from the Assessor's data.

C. SANBORN FIRE INSURANCE MAP REVIEW

South Shore attempted to review Sanborn Fire Insurance Maps for the area of the subject property as provided by EDR. Sanborn Maps are detailed drawings that show the location and use of structures on a given property during specific years. These maps were originally utilized by insurance companies to assess fire risk, but are now utilized as a valuable source of historical and environmental-risk information. However, according to EDR, no maps were available for the subject property.

D. CITY STREET DIRECTORY REVIEW

Based upon the other historical sources available, the current undeveloped nature of the subject property, and the confirmed previous agricultural usage city street directories were not reviewed for the subject property.

E. HISTORICAL TOPOGRAPHIC MAP REVIEW

Based upon the other historical sources available, the current undeveloped nature of the subject property, and the confirmed previous agricultural usage, historical topographic maps were not reviewed for the subject property.

F. INTERVIEWS

Mr. Richard D. Wilson, CEO of Boulders Menifee LLC

South Shore interviewed Mr. Richard D. Wilson, CEO of Boulders Menifee LLC, in an effort to obtain information regarding the current and former uses of the subject property via the Key Site Manager Environmental Questionnaire. Mr. Wilson stated that the subject property was acquired in 2020. Mr. Wilson reported that the subject property was undeveloped bare land prior to 4/11/2020. Mr. Wilson was unaware of any hazardous material contamination from the current operations or from past subject property usage.

G. RECORDED LAND TITLE RECORDS

As specified in ASTM E1527-2013, recorded land titles are records usually maintained by the municipal or county recorder of deeds which detail ownership fees, leases, land contracts, easements, and other encumbrances attached to or recorded against the subject property. Due to state land trust regulations and laws, land-title records typically only provide trust names,

owner's names, or easement holders, and not information concerning previous uses or occupants of the subject property. Therefore, this Assessment has relied upon other standard historical information sources which are typically more informative than recorded land titles. The Client has not provided land title records, a title report, or an environmental liens/activity usage limitation search for South Shore's review, or requested that such a search be performed by South Shore. It would be prudent to perform a review of title documentation to evaluate potential use restrictions or other issues. According to the ASTM E1527-2013 guidelines, it is the responsibility of the User of this report to perform such a review.

H. DATA GAPS

As specified in ASTM E1527-2013, data gaps are defined as "a lack or inability to obtain information required by the standards and practices listed in the regulation despite good faith efforts by the Environmental Professional or prospective landowner to gather such information". Data failure is one form of a data gap and occurs when historical research does not identify standard historical sources that are "reasonably ascertainable" and "likely to provide useful information to identify prior uses of the property". Per ASTM E1527-13, the assessment must document data failure and give reasons why historical sources were not available or excluded (if applicable).

Based on South Shore's research, the following data gap(s) and/or data failure was/were identified:

Information relative to deed restrictions and environmental liens, a title search, and completion of a pre-survey questionnaire from the report User were not provided by the Client. Based on the other information reviewed as part of this assessment, it appears unlikely this data gap will significantly affect South Shore's report conclusions.

As discussed in Section VI-A, and other sections of this report, changes to the property over time, and/or conditions at the time of the site visit, limited South Shore's observations of historical (and possibly current) conditions at the subject property. These changes included, but are not necessarily limited to: the unknown nature of the use of unreinforced BMX bicycle mounds constructed in the south-central portion of the subject property and used by people from the surrounding neighborhoods in the time of the Covid-19 Pandemic on the date of the site visit (4/2/2020). In addition, regarding the historical businesses at the property, South Shore was limited to review of available regulatory records and interviews of third-parties, since the prior business owners are unknown.

Building permits were unavailable or incomplete.

Historical data was not available in five-year increments. However, based on the sources reviewed, and the previously structurally undeveloped status of the subject property and neighboring properties as observed in the aerial photographs reviewed, it is unlikely this data gap will impact the findings and conclusions of this assessment.

SECTION V. AGENCY RECORDS REVIEW

In an effort to evaluate whether the subject property and/or nearby sites have reported USTs, hazardous waste generation, or hazardous material releases, regulatory information from the federal, state, and local agencies listed below were reviewed. The database report was compiled by a third-party database provider and is reportedly the most recent database information available from each agency. A copy of the database report is included in the appendix. According to the database provider, their search of the various databases conforms to ASTM E1527-2013 Standards. However, the accuracy of the information provided by the agencies is not without error or omission, and the information listed is limited to that which was reported to or gathered by that agency. A limited discussion of the number of sites identified, and of their potential impact to the subject property, follows the database descriptions. In addition, South Shore may request state and/or local regulatory agency information useful for this Assessment. The primary databases reviewed and their general search range criteria are below:

Federal Database	Search Range		
USEPA NPL/Superfund databases:	Target Property to 1.0 mile		
USEPA CERCLIS databases:	Target Property to 0.5 mile		
USEPA RCRIS facilities databases			
Corrective Action Sites:	1.0 mile		
TSD Facilities:	0.5 mile		
Generators:	0.25 mile		
USEPA ERNS database:	Target Property		
US Engineering Controls:	0.5 mile		
US Institutional Controls:	0.5 mile		
US DOD/FUDS databases:	1.0 mile		
US Brownfields:	0.5 mile		
State/Local Database	Search Range		
State Superfund databases:			
EnviroStor/Response databases:	1.0 mile		
Hist Cal-Sites:			
CA Bond Exp. Plan			
State Landfills database:	0.5 mile		
State Cortese	0.5 mile		
State/Local LUST databases:	0.5 mile		
State Spills databases:			
SLIC:	0.5 mile		
CHMIRS:	Target Property		
State/Local UST/AST databases:	0.25 mile		
State Liens database:	Target Property		
State Deed database:	0.5 mile		
State VCP database:	0.5 mile		
State HAZNET database:	Target Property		
Local Haz-Mat/Cleanup databases:	Target Property		

A. REVIEW OF FEDERALLY REPORTED ENVIRONMENTAL DATA

The review of the federal environmental databases listed below attempts to identify environmental problem sites, activities, and occurrences from the records of the U.S. Environmental Protection Agency (USEPA). The detailed listing, and a map showing the location of the sites relative to the subject property, is included in the appendix.

National Priorities List (NPL) of Superfund Sites:

The NPL is the USEPA's database of hazardous waste sites currently identified and targeted for priority cleanup action under the Superfund program. This search includes Proposed NPL sites, Delisted NPL sites, and NPL Recovery sites. NPL sites may encompass relatively large areas. As such, polygon coverage for the site boundaries (for a majority of the NPL sites), as produced by the EPA may be provided.

National Priorities List Liens (NPL Liens):

The NPL Liens database contains a list of filed notices of Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability.

Superfund Enterprise Management System (SEMS):

SEMS (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of EPA's Superfund Program across the United States. The list was formerly known as CERCLIS, renamed to SEMS by the EPA in 2015. The list contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). This dataset also contains sites which are either proposed to or on the National Priorities List (NPL) and the sites which are in the screening and assessment phase for possible inclusion on the NPL.

Superfund Enterprise Management System (SEMS) - Archive

SEMS-ARCHIVE tracks sites that have no further interest under the Federal Superfund Program based on available information. The list was formerly known as the CERCLIS-NFRAP, renamed to SEMS ARCHIVE by the EPA in 2015. EPA may perform a minimal level of assessment work at a site while it is archived if site conditions change and/or new information becomes available.

Archived sites have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list the site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. The decision does not necessarily mean that there is no hazard associated with a given site; only that based upon available information, the location is not judged to be potential NPL site.

RCRIS Corrective Action (RCRIS-CA) Sites:

The RCRIS-CA report contains information pertaining to hazardous waste handling facilities which have conducted, or are currently conducting corrective actions, as regulated by the Resource Conservation and Recovery Act.

Resource Conservation and Recovery Act Information System (RCRIS) Treatment, Storage, and Disposal (TSD) Facilities:

The RCRA program identifies and tracks hazardous waste from generation source to the point of ultimate disposal. The RCRIS-TSD facilities database is the composite of reporting facilities that transport, store, or dispose of controlled or hazardous waste. Identification on this list does not indicate that a site has impacted the environment.

RCRIS Generator Facilities:

The RCRIS program identifies and tracks hazardous waste from generation source to the point of ultimate disposal. The RCRIS generator facilities database (large and small quantity generators and various derivations) is the composite of reporting facilities that generate hazardous waste. Identification on these lists does not indicate that a site has impacted the environment.

Emergency Response Notification System (ERNS):

The ERNS database is the historical record of releases of hazardous substances reported to the USEPA.

EPA Engineering and Institutional Controls (US ENG/INST CONTROL)Sites:

These databases include listings of sites with engineering or institutional controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are required as part of the institutional controls.

Department of Defense (DOD) Sites:

The Unites States Geological Survey (USGS) maintains the DOD database, which consists of federally owned or administered lands, administered by the DOD, that have an area equal to or greater than 640 acres of the United States, Puerto Rico, and the US Virgin Islands. Identification on this database does not necessarily indicate that a site has impacted the environment.

Formerly Used Defense Sites (FUDS):

The U.S. Army Corps of Engineers database contains a listing of locations of Formerly Used Defense Sites (FUDS) where the U.S. Army Corps of Engineers is actively working or will take necessary cleanup actions. Identification on this database does not indicate that a site has impacted the environment.

US Brownfields Sites (Brownfields):

The US Brownfields site includes brownfields properties addressed by Cooperative Agreement Recipients (CAR) and brownfields properties addressed by Targeted Brownfields Assessments (TBA). EPA's TBA program is designed to help states, tribes, and municipalities minimize the uncertainties of contamination often associated with brownfields. Cooperative Agreement Recipients (states, political subdivisions, territories, and Indian tribes) become Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients when they enter into BCRLF cooperative agreements with the USEPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

CERCLA Lien Information (LIENS 2):

A Federal Superfund Lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

Facility Index System (FINDS) sites:

The FINDS Report is a computerized inventory of all facilities that are regulated or tracked by the U.S. Environmental Protection Agency. These facilities are assigned a unique identification number that serves as a cross-reference for databases in the EPA's program system. Identification on this database does not indicate that a site has impacted the environment.

B. REVIEW OF STATE-REPORTED ENVIRONMENTAL DATA

A general description of the databases searched and the corresponding responsible state or local agency. The detailed listing, and a map showing the location of the sites relative to the subject property, is included in the appendix.

State Hazardous Waste Site (SHWS) Databases:

State Hazardous Waste Site records are the states' equivalent to CERCLIS (refer to CERCLIS discussion).

California EnviroStor Databases:

The Department of Toxic Substances Control's (DTSC's) Cal-Sites database contains potential or confirmed hazardous substance release properties. CalSites database was created by the DTSC, but DTSC no longer up-dates the The CalSites database was replaced by the EnviroStor CalSites database. database. The DTSC's RESPONSE database identifies confirmed release sites where DTSC is involved in remediation, either in a lead or oversight capacity. These confirmed release sites are generally high-priority and high potential risk at the time of listing. The DTSC's Site Mitigation and Brownfields Reuse Program's (SMBRPs) EnviroStor database identifies sites that have reported contamination or sites for which there may be reason to investigate further. The database includes the following site types: Federal Superfund Sites (National Priorities List (NPL)); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in Cal-Sites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites.

Solid Waste Facilities, Landfills and Recycling Facilities:

The State Solid Waste Facilities and Landfills and Recycling databases include an inventory of active, closed, and inactive solid waste disposal facilities, landfills, refuse transfer stations, and recycling facilities (non-landfill sites).

Historical Cortese Database:

The Historical Cortese list contains hazardous waste and substance sites compiled pursuant to Assembly Bill 3750 (Cortese, Chapter 1048, Statutes of 1986). The information included in this list was compiled with information from the California DTSC, the State Water Resources Control Board, and the California Waste Management Board. This database contains primarily LUST sites, although other types of sites may be included.

Leaking Underground Storage Tanks (LUSTs):

State and/or local agencies maintain inventories of LUSTs (also known as LTANKS) in a statewide database.

State/Local Spills Databases:

The Spills, Leaks, Investigations, and Cleanup (SLIC) Cost Recovery Listing program is designed to protect and restore water quality from spills, leaks, and similar discharges. The database(s) included in this section are the states' equivalent to the ERNS report and generally contain information for reported hazardous material/waste surface or groundwater contamination release investigations reported in that state or locality. The California Hazardous Material Incident Report System (CHMIRS) database contains information on reported hazardous waste material incidents (accidental releases or spills).

Underground Storage Tanks (USTs)/Aboveground Storage Tanks (ASTs):

USTs are regulated under Subtitle I of the RCRA (as well as various state regulations), and must be registered with the State Underground Storage Tank Program. These are registered USTs only, and identification on this list(s) does not necessarily indicate that the site has impacted the environment. This search includes review of the Active UST Facilities (UST) database, Facility Inventory Database (CA FID UST), Hazardous Substance Storage Container Database (HIST UST), and SWEEPS UST Listing database (SWEEPS UST). Also potentially included in this section are sites identified on historic UST databases that are no longer maintained. The AST database is the State Water Resources Control Board's Hazardous Substance Storage Container Database for registered ASTs. Note: The nature of this listing indicates a UST and/or AST has been reported at the respective address; however, the nature of the UST and/or AST listing does not indicate whether the presence of the UST(s) and/or AST(s) has resulted in an impact to the environment. UST/AST sites with reported releases

are typically identified on other listed databases which indicate a reported release or environmental impact and are discussed accordingly.

Environmental Liens Listing (LIENS):

The Department of Toxic Substances Control's (DTSC) LIENS database includes a listing of property locations with environmental liens for California where DTSC is a lien holder.

Deed Restriction Listing (DEED):

The Department of Toxic Substances Control's (DTSC) DEED database includes a listing of Site Mitigation and Brownfields Reuse Program (SMBRP) Facility Sites with Deed Restrictions and Hazardous Waste Management Program Facility Sites with Deed/Land Use Restrictions. The SMBRP list includes sites cleaned up under the program's oversight and generally does not include current or former hazardous waste facilities that required a hazardous waste facility permit. The list represents deed restrictions that are active, and some sites have multiple deed restrictions. The DTSC Hazardous Waste Management Program (HWMP) has developed a list of current or former hazardous waste facilities that have a recorded land use restriction at the local county recorder's office. The land use restrictions on this list were required by the DTSC HWMP as a result of the presence of hazardous substances that remain on site after the facility (or part of the facility) has been closed or cleaned up. The types of land use restriction include deed notice, deed restriction, or a land use restriction that binds current and future owners.

Voluntary Cleanup Program (VCP):

The DTSC's VCP database contains low threat level properties with either confirmed or unconfirmed releases and the project proponents have requested that DTSC oversee the investigation and/or cleanup activities and have agreed to provide coverage for DTSC's costs.

State and/or Local Agency Generators (HWTS/HAZNET):

The Hazardous Waste Tracking System (HWTS or HAZNET) data is extracted from copies of hazardous waste manifests kept by the Cal-EPA-DTSC. These manifests track hazardous wastes from generation source to the point of ultimate disposal. Permit data is generally culled from local agency database(s) for hazardous material handlers and generators. Identification on these lists does not indicate that a site has impacted the environment and the data has not always been verified for accuracy by the DTSC or local agencies.

National Pollutant Discharge Elimination System (NPDES) Database:

The National Pollutant Discharge Elimination System (NPDES) includes sites that have had or have a permit for the discharge of wastewater or storm water issued by the Regional Water Quality Control Board or a local agency (e.g., Public Works Department). Identification on this database does not necessarily indicate that a site has impacted the environment, only that permitted discharge(s) have occurred.

State and/or Local Agency Air Emissions Database (EMI):

The EMI data is extracted from permits for air emissions kept by the state or local air resources agency. The nature of the EMI listings indicates the emission of volatile materials to the air; however, the nature of the EMI listings does not indicate whether the related activities resulted in an impact to the environment. Sites with reported releases are typically identified on other listed databases which indicate a reported release or reported impact to the environment (e.g., LUST, SLIC, Cortese) and are discussed accordingly.

Drycleaners Database:

The California Department of Toxic Substance Control (DTSC) maintains a listing of drycleaners and drycleaner related facilities that have EPA ID numbers. EPA ID numbers are assigned to facilities with certain SIC codes (power laundries; garment pressing and cleaner's agents; etc.). The nature of the Drycleaners listings indicates the facility has been given an EPA ID number due to a SIC code assignment; however, the nature of the Drycleaners listings does not indicate whether the related activities resulted in an impact to the environment. Sites with reported releases are typically identified on other listed databases which indicate a reported release or reported impact to the environment (e.g., LUST, SLIC, Cortese) and are discussed accordingly.

Notify 65 Database:

Notify 65 listings generally indicate that some type of release and/or groundwater impact have occurred which was required to be reported under Proposition 65 rules. These types of listings typically indicate groundwater has been impacted by the listed site; however, details are typically not provided in this type of database.

EDR Historical Auto Stations, Historical Cleaners, & Manufactured Gas Plants Databases:

These databases include former gas stations, auto repair shops, dry cleaners, Laundromats, and manufactured gas plants that are typically no longer active. Identification on these databases does not necessarily indicate that such activities actually occurred at that site or that a site has impacted the environment.

Local Regulatory Databases:

The Riverside County Department of Environmental Health (RCDEH) maintains a list of USTs and LUSTs (Riverside Co. UST/LUST). Identification on this database typically does not indicate that a site has impacted the environment.

<u>Database Discussion</u> – Below is a brief discussion of those sites listed in the database as at or nearby the subject property, and potentially sites at a further distance that, in South Shore's experience, have an obvious potential to impact the subject property (e.g., NPL sites).

SUBJECT PROPERTY Database Listings				
Listing Database(s) Discussion				
Name/Address				
No listings at subject	n/a	n/a		
property				

Selected OFF-SITE Database Listings					
Site Name/Address	Distance (miles/direction)	Gradient Position	Database(s)		Status
O'Reilly Auto Parts 25894 Newport Road	1,290 feet east- southeast	Cross- gradient	CERS WASTE, HAZNET, O		No reported release

Discussion: The next closest site with hazardous waste generation is plotted 1,290 feet to the east-southeast and up-gradient. There was no reported release at this site and based on the distance from the subject property (approximately ¼-mile southeast and cross-gradient), this site does not appear to be a significant environmental concern for the subject property.

Based upon the distance (over 1,925 feet), status (no releases reported within 0.9 miles), type of listing and/or cross-gradient location, the three remaining database listings appear unlikely to have significantly environmentally impacted the subject property.

Unlocatable/Unplottable Sites:

Unplottable "orphan" sites are those which could not be plotted by the database provider using conventional geo-coding methods, typically because the information provided in the

original government database was unclear, incorrect or missing. A listing of orphan sites (if any) appears at the end of the database, immediately after the last plottable site description.

South Shore reviewed the orphan list for sites with the same name as the subject property (if applicable) and/or the same or similar property address. This review is inherently limited by the incomplete and/or possibly incorrect data reported in the orphan listings. For orphans apparently not related to the subject property, only those obviously located adjoining or within a short distance that may affect the property are discussed. Orphan sites which are also listed in the plotted section are not re-discussed.

South Shore's review of the unlocatable/orphan list revealed no obvious sites of concern listed at or adjoining the subject property.

C. LOCAL AGENCY RECORDS SEARCH

The following is a discussion of the results of South Shore's written records requests, online regulatory database review, and/or personal/telephone contacts (as applicable) made to state and/or local government agencies in an effort to obtain potential information relevant to the subject property. Please note that, as discussed in the ASTM E1527-13 Standard, Section 8.1.5, records are considered available within a *reasonable time and cost*, only if available within 20 calendar days of the request and for a nominal cost (only covering the source's cost of retrieving and/or duplicating the information):

Santa Ana Regional Water Quality Control Board (SARWQCB):

South Shore searched SARWQCB records in an effort to evaluate whether hazardous material incidents, USTs, and/or LUSTs have been reported at the subject property. However, the SARWQCB informed South Shore that such a search cannot be performed without a specific property address. Since no address is assigned to the subject property, such a search is impractical. Based upon the historically undeveloped nature of the property and on South Shore's other research performed, this is unlikely to affect the conclusions of this report.

Riverside County Department of Environmental Health (RCDEH):

South Shore contacted the RCDEH in an effort to evaluate whether hazardous material incidents, USTs, and/or LUSTs have been reported at the subject property. However, the RCDEH informed South Shore that such a search cannot be performed without a specific property address. Since no address is assigned to the subject property, such a search is impractical. Based upon the historically undeveloped nature of the property and on South Shore's other research performed, this is unlikely to affect the conclusions of this report.

South Coast Air Quality Management District (SCAQMD):

South Shore reviewed the SCAQMD's online database (www.aqmd.gov) in an effort to evaluate whether hazardous material-related emissions records were available for the subject property. That search revealed no records listed for the subject property.

California EPA - Department of Toxic Substances Control (DTSC):

South Shore searched DTSC records in an effort to evaluate whether hazardous materials usage, hazardous waste generation, hazardous material incidents have been reported at the subject property. However, the DTSC informed South Shore that such a search cannot be performed without a specific property address. Since no address is assigned to the subject property, such a search is impractical. Based upon the historically undeveloped nature of the property and on South Shore's other research performed, this is unlikely to affect the conclusions of this report.

South Shore also reviewed CalEPA-DTSC's Hazardous Waste Tracking System (HWTS) online database (http://hwts.dtsc.ca.gov) in an effort to identify potential hazardous waste generation/disposal activities associated with the subject property. However, the DTSC informed South Shore that such a search cannot be performed without a specific property address. Since no address is assigned to the subject property, such a search is impractical. Based upon the historically undeveloped nature of the property and on South Shore's other research performed, this is unlikely to affect the conclusions of this report.

California SWRCB GeoTracker & DTSC-EPA EnviroStor Databases:

South Shore reviewed the online GeoTracker and EnviroStor databases in an effort to identify potential USTs, hazardous materials releases or similar issues associated with the subject property address. That search revealed no listings for the subject property.

California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) Maps:

South Shore reviewed DOGGR maps available on the DOGGR website in an effort to identify whether oil or gas wells have been reported in the vicinity of the subject property. According to the DOGGR website mapping interface, no oil or gas wells are reported in the immediate subject property area (within 1/8-mile).

D. VAPOR ENCROACHMENT SCREENING

South Shore has performed a limited Vapor Encroachment Screening (VES) for the subject property as mentioned in ASTM Standard Practice E2600-15. The purpose of this VES was to identify existing Vapor Encroachment Conditions (VECs), which is defined by ASTM E2600-15 as "the presence or likely presence of chemical of concern vapors in the subsurface of the target property caused by the release of vapors from contaminated soil and/or groundwater either on or near the target property." However, the review was general in nature and may not encompass all aspects of the E2600-15 guidelines. South Shore has reviewed known or reported releases of petroleum hydrocarbon or other constituents of concern (COCs, including volatile organic compounds - VOCs) to subsurface soils and/or groundwater within the vicinity of ASTM-specified distances from the subject property, as reported within the radius report. It should be noted that since this review only addresses sites

with reported releases in the radius report, it does not address potential unreported impact from nearby sites, if any.

Based on the South Shore's review, the following is indicated about the sites with known releases relative to a potential vapor encroachment condition (VEC) at the subject property.

	Number/Name of Sites	VEC Exists	VEC Does Not Exist
Petroleum Releases (<528 feet)	0		X
VOC Release (<1,742 feet)	0		X

Based upon the above review, a VEC at the subject property from off-site database listings has not been identified.

E. TRIBAL RECORDS SEARCH

According ASTM E1527-2013, records for local and tribal records shall be checked to satisfy all appropriate inquiry for this assessment. The following is a discussion of the results of South Shore's written records requests, online regulatory database review, and/or personal/telephone contacts (as applicable) made to tribal governmental agencies in an effort to obtain potential information relevant to the subject property:

The subject property is not located on tribal property and therefore no inquiry was necessary.

SECTION VI. SITE VISIT OBSERVATIONS

A. SURFACE CHARACTERISTICS

At the time of the site visit, the subject property consisted of a total of approximately 10-acres of undeveloped land. The weeds and grasses appeared to be in good condition with no signs of unnatural or chemically induced stress. No pits, ponds, lagoons, swales, or surface impoundments potentially containing hazardous materials were observed on the subject property. Weather conditions at the time of the site visit consisted of overcast skies, with temperatures in the 70s.

Specific observations of note from the site visit included: The subject property consists of approximately 10 acres of undeveloped land that is open (unfenced) on the west and south sides of the property, with black wrought iron fencing on the south side of the property extending from the eastern end of Heroes Court eastward to the southeastern corner of the subject property. An opening in the black wrought iron fencing is located west of the southeastern property corner and has created an unimproved footpath access into the subject property. An approximately 6-foot high masonry-block wall separates the eastern property line of the tax parcel from single-family residences located to the east with an opening in the masonry-block wall at the terminus of Harzburg Road that allows limited foot traffic access into the subject property. A storm drain opening is located immediately north of the southwestern property corner, on the east side of Berea Road. An approximately 5-foot high chain link fence extends along the northern property line and separates the subject property from a concrete storm drain channel located to the north followed by single-family residences. Unreinforced BMX bicycle mounds constructed in the south-central portion of the subject property amongst granite rock outcroppings are used by people from the surrounding neighborhoods for unsupervised recreational purposes. Isolated pieces of abandoned furniture are located throughout the site including a mattress, a couch, carpet, a wood pallet, and pieces of Styrofoam. Small areas of standing water were observed onsite from recent rains.

A Conceptual Site Plan of the Boulders Mixed Use site proposed in the western half of the subject tax parcel north of Heroes Court was created by Summa Architecture and dated 1/13/2019. The Conceptual Site Plan was adapted by South Shore Testing & Environmental as an Infiltration Test Location Map and was copied from a South Shore Onsite Stormwater Infiltration System Investigation report dated 2/24/2020. The proposed development for the subject property represented on the Summa Architecture Conceptual Site Plan includes 490 parking stalls (including 265 open/carport stalls and garages) for 238 one, two, and three bedroom apartment dwelling units, a 30,000 square foot 3-story commercial office and child care structure and plaza located in the southwest property corner, a 2,000 square foot fitness structure and recreation area in the center of the site, a 4,400 square foot clubhouse and recreation area located in the southeast corner of the proposed mixed use development, and five trash enclosures located throughout the site. The site area was estimated to be 432,115 square feet on the Conceptual Site Plan with approximately 342,800 square feet of total building area. Site access would be provided by a driveway approach located on the west side of the site and the main site entrance located on the south side of the site. The eastern half of

the subject tax parcel would remain undeveloped according to the Conceptual Site Plan (the Conceptual Site Plan is included in the Site Maps portion of the Appendix.

B. WASTEWATER AND STORMWATER MANAGEMENT

At the time of the site inspection, the subject property was undeveloped land, and no wastewater generating activities were observed.

C. POTABLE WATER SUPPLY AND SEWER SERVICE

The subject property would reportedly utilize future water service supplied by the Western Municipal Water District (WMWD) and future sewer service by the Quail Valley Sewer District. During the course of the site visit, no obvious evidence of active or abandoned water supply wells or septic systems were observed onsite.

D. STRUCTURE CONSTRUCTION

The subject property was undeveloped land at the time of the site inspection. No structures or evidence of past structures (e.g., foundations, etc.) were noted.

E. BUSINESS OPERATIONS DESCRIPTION

At the time of the site visit, the subject property was undeveloped land. South Shore's research indicates no dry cleaners, gasoline stations, military bases, industrial facilities, or major manufacturing operations have occupied the subject property.

SECTION VII. HAZARDOUS MATERIAL/WASTE OBSERVATIONS

A. HAZARDOUS MATERIALS HANDLING AND STORAGE

At the time of the site visit, the subject property consisted of undeveloped land. Hazardous materials handling and/or storage activities were not observed at the subject property during the site visit.

B. WASTESTREAM GENERATION, STORAGE AND DISPOSAL

At the time of the site visit, the subject property consisted of undeveloped land. Waste stream/hazardous waste generation, storage, and/or disposal activities were not observed at the subject property during the site visit.

C. SOLID WASTE DISPOSAL

At the time of the site visit, the subject property consisted of undeveloped land. Solid waste disposal activities were not observed at the subject property during the site visit.

D. ABOVEGROUND STORAGE TANKS (ASTs)

Visual or physical indicators of current or former hazardous material ASTs were not observed at the subject property during the site visit.

E. UNDERGROUND STORAGE TANKS (USTs)

As discussed in the Section V (Agency Records Review) of this report, no USTs were reported at the subject property. In addition, no visual or physical evidence of current or past USTs was discovered during the site visit in the readily visible areas of the property. In particular, South Shore searched for: fill pipes, vent pipes, manways, manholes, access covers, concrete pads not homogeneous with surrounding surfaces, concrete built-up areas potentially indicating pump islands, abandoned pumping equipment, or fuel pumps.

SECTION VIII. OTHER POTENTIAL ISSUES OF CONCERN

A. PCB-CONTAINING EXTERIOR ELECTRICAL TRANSFORMERS

Exterior pad-mounted, pole-mounted, or below-ground (vaulted) electrical transformers were not observed at the subject property during the site visit.

B. OTHER PCB-CONTAINING INTERIOR OR EXTERIOR EQUIPMENT

At the time of the site visit, the subject property consisted of undeveloped land, and no structures with fluorescent light fixtures containing PCBs, or other evidence of any other equipment likely containing PCB-contaminated fluid (e.g., interior electric transformers, hydraulic elevators, hydraulic hoists/lifts, hydraulic loading dock ramps, other fluid containing equipment, etc.) was observed.

C. SUSPECT ASBESTOS-CONTAINING MATERIALS (ACMs)

At the time of the site visit, the subject property consisted of undeveloped land. Therefore, suspect asbestos-containing building materials were not observed. However, this report does not address the potential presence of naturally occurring asbestos or asbestos-like minerals which may or may not be present on-site. Such research is beyond the scope of this report.

D. LEAD-BASED PAINT (LBP)

At the time of the site visit, the subject property consisted of undeveloped land. Therefore, suspect lead based paint covered building materials were not observed.

E. LEAD IN DRINKING WATER

At the time of the site visit, the subject property consisted of undeveloped land. Therefore, drinking water plumbing systems related to structures were not observed.

F. AIR QUALITY

Unusual smells, noxious odors, or visual emissions were not observed during the inspection of the subject property. However, these observations are general in nature and should not be construed as an air quality assessment.

G. RADON

According to the USEPA, the general area of the site has a predicted average indoor screening level of less than the EPA guideline action level of 4.0 picoCuries per liter of air (EPA Radon Zone Level of 2 or 3). Therefore, based upon the reported subsurface characteristics of the area, the subject property exhibits a low potential for high-level radon exposure.

H. RAILROAD RIGHTS-OF-WAY

There are several potential environmental risks associated with railroad rights-of-way, including the usage of herbicides, pesticides, petroleum materials and related heavy metals (e.g. arsenic) to maintain the tracks, as well as the potential spillage of hazardous materials from railcars. During the site visit, railroad rights-of-way, spurs, or related features were not observed on or immediately adjoining the subject property.

SECTION IX. ADJOINING PROPERTY OBSERVATIONS

As discussed below, based upon limited observations of the adjoining properties from publicly accessible locations, as well as a review of federal, state, and local environmental databases, none of the adjoining properties appeared to have significantly environmentally impacted the subject property at this time.

Historically, nearby properties utilized various hazardous materials, and some of these sites may have impacted the environment (refer to Section V). However, based upon the limited database information available to South Shore, these sites do not appear to have significantly environmentally impaired the subject property at this time.

A. ADJOINING PROPERTIES MATERIALS STORAGE

Visual observations of the portions of the adjoining properties visible from the subject property or public roadways did not indicate the exterior storage of hazardous materials or wastes. No indications of spillage or staining were observed in the observable exterior areas of these sites. Additionally, no obvious indications of improper hazardous material storage or unusual or suspicious materials handling or storage practices were observed.

B. ADJOINING PROPERTIES WASTESTREAM DISPOSAL

No unusual or suspicious waste stream disposal activities were observed on the portions of the adjoining properties visible from the subject property or public roadways.

SECTION X. STATEMENT OF THE ENVIRONMENTAL PROFESSIONALS

This Assessment has been performed for the exclusive use and benefit of the addressee(s) identified on the cover of this report, or agents directly specified by it (them), for the transaction at issue concerning the subject property described in this report. This Assessment shall not be used or relied upon by others without the prior written consent of South Shore Testing & Environmental, Inc. and of the addressee(s) named on the cover of this report. In addition to any limitations described in this report, it is also subject to the terms and conditions of the signed service agreement with the Client.

STATEMENT OF QUALITY ASSURANCE

The conclusions contained within this Assessment are based upon site conditions that were readily observed and were reasonably ascertainable and present at the time of the site visit, and upon the other research performed as detailed within this report. The findings and conclusions represent our best professional opinion and judgment. In addition, the conclusions and recommendations stated in this report are based upon personal observations made by South Shore and upon information provided by others and such information is presumed accurate.

Signature of Environmental Assessor/Professional - Kevin M. Clark, PG #8573:

Signature/Environmental Assessor/Professional

STATEMENT OF QUALITY CONTROL

I declare that, to the best of my professional knowledge and belief, I meet the definition of an Environmental Professional as defined in 40 CFR §312.10. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Signature of Environmental Professional - John P. Frey, Senior Assessor:

Signature/Environmental Professional

No. 8573