

# **Phase I**

# **Environmental Site Assessment**

Subject Property: Property Address, City, State Zip Fannie Mae Deal Identifier: TBD Client Project Number: TBD

# Engaged By:

Client Name:	Client Contact
Client Company:	Sample Client Name
Client Address:	Client Street Address, Client City, Client State, Zip
Order Number:	Project Number
Date of Engagement:	December 1, 2023
Report Date:	January 20, 2024



Project Number Garden Apartments Property Address City, State Zip

Report Date: January 20, 2024

Date: January 20, 2024

Client Contact Contact Title Sample Client Name Client Street Address Client City, Client State Zip

(Client Project Number TBD)

Dear Client Contact,

CREtelligent was contracted by you on behalf of Sample Client Name (herein referred to as the "Client") to conduct a Phase I Environmental Site Assessment (herein referred to as "ESA") on the Garden Apartments located at Property Address, City, State Zip (herein referred to as the "Subject Property") (Client Project Number TBD). CREtelligent received written authorization from the Client on December 1, 2023 to perform the ESA. This ESA was performed in general accordance with the scope and limitations of ASTM E1527-21, the "All Appropriate Inquiries" ("AAI") rule, promulgated by the EPA (40 C.F.R Part 312), as amended, supplemented, or restated from time to time ("All Appropriate Inquiries"); Form 4251: Fannie Mae Multifamily Instructions for Performing a Multifamily Phase I ESAs, and the Engagement Agreement for Services Proposal Project Number executed by the Client. Exceptions to or deletions from this protocol are discussed in this report.

We appreciate your business. If you have any questions regarding the attached report, or if we can be of any further service to you, please do not hesitate to contact us at (866) 901-7201.

Sincerely,

Signature for Unknown User Senior Technical Reviewer

Signature for Unknown User National Account Manager

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#### **Project Summary Table**

CREtelligent has performed a Phase I Environmental Site Assessment (ESA) for the property at Property Address, City, State Zip (subject property) dated January 20, 2024. This ESA was conducted at the request of Sample Client Name using procedures and practices conforming with the ASTM E1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and the current Fannie Mae DUS Guidelines.

REPORT SECTION	NFA	REC	CREC	HREC	BER	DE-MINIMIS	SECTION
Subject Property General Characteristics	~						2.1
Historical Use Summary	~						3.5
Subject Property Regulatory Database Review	•						4.1
Off-Site Regulatory Database Review	*						<u>4.2</u>
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Asbestos Containing Material					~		7.1
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#### **1.0 EXECUTIVE SUMMARY**

CREtelligent has performed a Phase I Environmental Site Assessment (ESA) for Sample Client Name on the Garden Apartments, located at Property Address, City, State (Subject Property) dated January 20, 2024. CREtelligent performed the Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21, the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), and the Fannie Mae DUS Guidelines of the Subject Property. Any exceptions to, or deletions from, this practice are described in Section 8.0, "About this Environmental Assessment Report" of this report. This assessment evaluated potential environmental liabilities resulting from past and current land uses. The following summary is meant to provide an overview of the report findings. The Client should not draw any conclusions or take any actions without reading this ESA report in its entirety.

A <u>Subject Property Map</u>and <u>photographs</u> of the Subject Property are included in the appendices of this report.

Pertinent information on the Subject Property and a summary of the conclusions and findings are noted below:

#### **Subject Property Information**

Property Use	Multifamily
Year Constructed	1975
Number of Parcels	2
Assessor Parcel Number	Parcel ID
Subject Property Acreage	10.2
Number of Units	275
Number of Buildings	12
Number of Stories	3
Total Building Square Footage	275,000 SF
Additional Improvements	Additional improvements include a single-story leasing office/clubhouse w/swimming pool
Current Commercial Tenants	N/A
Site Assessor	Site Assessor Name

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# **1.1 Conclusions and Findings**

# **RECOGNIZED ENVIRONMENTAL CONDITION (REC):**

This assessment did not reveal evidence of a REC in connection with the Subject Property.

#### HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITION (HREC):

This assessment did not reveal evidence of a HREC in connection with the Subject Property.

# CONTROLLED RECOGNIZED ENVIRONMENTAL CONDITION (CREC):

This assessment did not reveal evidence of a CREC in connection with the Subject Property.

# **DE MINIMIS CONDITION:**

This assessment did not reveal evidence of De Minimis Condition in connection with the Subject Property.

# **BUSINESS ENVIRONMENTAL RISK (BER):**

This assessment did not reveal evidence of a BER in connection with the Subject Property.

#### SIGNIFICANT DATA GAP:

This assessment did not reveal evidence of a significant data gap in connection with the Subject Property.

#### ASTM Non-Scope Considerations

#### ASBESTOS CONTAINING MATERIAL (ACM)

The following ACM concerns were identified:

• Based on the pre-1981 date of construction, it is possible that friable and non-friable ACM are present on the Subject Property. Suspect materials observed by CREtelligent include friable popcorn ceiling texture and non-friable wallboard and joint compound, vinyl floor tile, vinyl sheet flooring, mastic, and roofing materials. The observed materials were in good condition. It should be noted that the popcorn ceiling texture was observed to be encapsulated under several layers of fresh paint and the potential for fiber release is low.



RADON				
The following Radon concerns were identified:				
• Based on the results of short-term radon testing, elevated radon concentrations (above 4.0 pCi/L), were identified in six of the 31 units tested.				
LEAD BASED PAINT (LBP)				
The following LBP concerns were identified:				
• Due to the age of the Subject Property, constructed in 1975, there is a potential that LBP is present. All observed painted surfaces were in good condition with no evidence of peeling or flaking surfaces in the units observed.				
MOLD				
The following mold concerns were identified:				
• None				
WETLANDS				
The following wetland concerns were identified:				
• None				

#### **1.2 Recommendations**

Based on the information referenced in this ESA, CREtelligent recommends the following:

- CREtelligent recommends that additional short-term radon testing of 25% of the ground-contact units within the buildings. This is to include the units that tested at 4.0 pCi/L or greater during the first round of testing. Of note, remediation is required if the average of the two short-term tests is 4.0 pCi/L or greater. This would include the installation of a radon mitigation system in all buildings having a unit with a radon concentration of 4.0 pCi/L or greater.
- CREtelligent recommends that the suspect ACM be managed under an Asbestos Operations and Maintenance (O&M) Program.

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• Based on the condition of the painted surfaces observed on-site, CREtelligent recommends that all painted surfaces be managed under the current LBP operations and maintenance (O&M) program. The objective of the O&M program is to implement a practical management approach to controlling LBP at the Subject Property, by monitoring its condition, controlling any activities that might impact the LBP, and responding promptly should the material be damaged.

#### **1.3 Project Personnel**

Per ASTM standard, this report has been prepared with oversight and final review by an Environmental Professional (EP) as defined in §312.10 of 40 Code of Federal Regulations (CFR) Part 312.

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

Signature for Unknown User

Senior Project Manager Environmental Professional

The following CREtelligent personnel were directly responsible for the preparation of this report:

Signature for Unknown User

Project Manager Project Manager

The resumes of the EP and Project Managers are provided in Appendix-Consultant Resumes.



#### 2.0 SUBJECT PROPERTY INFORMATION

The Subject Property information is based on publicly-available information, information obtained during the site reconnaissance, information provided by the Client, on-line property assessor information, Google Earth, Google Street view, and/or other readily available resources.

#### 2.1 Subject Property General Characteristics

IDENTIFIER	DESCRIPTION OF IDENTIFIED ITEMS
Property Use:	Multifamily
Subject Property Address	Property Address, City, State Zip
Number of Parcels	2
Assessor Parcel Number (APN)	Parcel ID
Subject Property Acreage	10.2
Number of Buildings	12
Number of Stories Above Grade	Three-story
Basement or Subgrade Areas	No
Total Building Square Footage	275,000 SF
Year of Construction	1975
Additional On-site Development	Additional improvements include a single-story leasing office/clubhouse w/ swimming pool
Current Tenants	N/A

#### 2.2 Subject Property Services and Utilities

The following municipal services and utilities are provided to the subject property and/or the surrounding area.



IDENTIFIER	DESCRIPTION OF IDENTIFIED ITEM
Potable Water Supply	City Water
Sewage Disposal System	Municipal Sewer
Storm Water	Municipal Storm Sewer
Electricity	County Electric
Natural Gas	Natural Gas Provider
Heating/Cooling Systems	Heating, ventilation and air conditioning (HVAC) are provided by natural gas and electric split systems.

# **Date of Utility Connection**

Municipal water and sewer services were reportedly available at the time the Subject Property was constructed.

#### 2.3 Adjacent Property Information

During the site reconnaissance, CREtelligent observed the following land use on properties in the immediate vicinity of the Subject Property.

ADDRESS	CURRENT USE	CURRENT OCCUPANT(S)			
NORTH					
100 East 2nd Avenue	Commercial	Multi-tenant retail property under development.			
200 East 2nd Avenue	Gas Station	A BP-branded gas station and convenience store.			
EAST					
413 Brentwood Street	Office	A two-story multi-tenant building used for general office space. Tenants include a dentist office, a law office, an insurance company, and two technology companies.			
N/A	Vacant Land	N/A			



ADDRESS	CURRENT USE CURRENT OCCUPANT(S)			
SOUTH				
400 East 3rd Avenue	Residential	Single-family residence		
404 East 3rd Avenue	Residential	Single-family residence		
WEST				
450 Palmer Road	Residential	Single-family residence		

# 2.4 Physical Settings

The following section provides a brief summary of the physical settings associated with the Subject Property and general site vicinity. These settings include information on elevation, the topographic slope of the general site vicinity, a description of general soil type, nearest surface water body, and estimated depth and flow direction of groundwater where known.

PHYSICAL SETTINGS			
TOPOGRAPHY			
Elevation	30 feet above mean sea level (MSL)		
Topographic Quad	Fredericksburg Quadrangle		
General Slope	The Subject Property is relatively flat, with a slight gradient to the northeast.		
HYDROLOGY			
Nearest Surface Water Body	There are no surface water bodies on or bordering the Subject Property.		
Estimated Depth to Groundwater	20 feet bgs Source: Estimated by local topography		
Estimated Groundwater Flow Direction	Northeast		



PHYSICAL SETTINGS				
GEOLOGIC INFORMATION				
Geology	Antlers Sand or Antlers Sandstone (Ka) Early Cretaceous aged sandstone approximately 200 to 700 feet thick. Source: USGS Geologic Map State.			
SOIL				
Soil Name	The soils in the vicinity of the Property are classified as Urban Land. The Urban Land designation indicates that more than 85 percent of the original soils have been disturbed or covered by paved surfaces, buildings or other structures. Because of the variability of the soil material, onsite investigation would be required to determine the specific soil composition at the Property. Source: USDA Web Soil Survey, Natural Resources Conservation Service Soil Survey, and Geographic Database (SSURGO) included in the ERIS Physical Setting Report.			
	WELLS, PIPELINES, AND MINERALS EXPLORATION			
Oil and Gas Wells	No oil or gas wells or associated production equipment were observed at the Subject Property. No wells were depicted on the USGS Topographic Map. According to the identify source, there are no oil or gas wells on the Subject Property.			
Pipelines	No petroleum pipelines were observed on or adjacent to the Subject Property. No pipelines were depicted on the USGS Topographic Map. According to the identify source, there are no pipelines on the Subject Property.			
Mining	No mining activities were observed on or in the vicinity of the Subject Property. No mining activities were depicted on the USGS Topographic Map.			



#### 3.0 HISTORICAL RECORDS REVIEW

To establish the history of the Subject Property and adjacent properties, CREtelligent ordered, reviewed, and interpreted multiple historical resources. These historical resources were provided by CREtelligent's proprietary database and/or third-party sources. These historical resources include but are not limited to the following: aerial photography; sanborn/fire insurance maps; topographic maps; and city directories (where available). CREtelligent reviewed the following historical documents:

# 3.1 Historical Aerial Photographs

Aerial photographs, which are of a sufficient resolution to allow identification of development and activities of areas encompassing the subject property, can be used in documenting the historical usage of a property. CREtelligent reviewed the following aerial photographs as provided by ERIS, which are included in the <u>Appendices - Historical</u> <u>Resources</u>.

YEAR RANGE	DESCRIPTION
1938-1973	The Subject Property is primarily undeveloped land, with the exception of two small residential structures on the northern portion of the property. Adjoining properties include several small retail businesses to the north, and vacant land with scattered residential development to the east, south and west.
1976-1985	The Subject Property is shown to be improved with the current multifamily structures. Adjoining properties include several small retail businesses to the north, and vacant land with scattered residential development to the east, south and west.
1989-Present	No significant changes to the Subject Property are shown since the previous aerials photographs reviewed. Commercial development is more prevalent on the adjacent properties including the existing gasoline filling station to the north and office development to the east.

#### 3.2 Sanborn Fire Insurance Maps

CREtelligent attempted to obtain Sanborn Fire Insurance Maps from ERIS covering the Subject Property and surrounding area. No historical Sanborn maps were identified. The "no coverage" notification is included in Appendix - Historical Resources.



# **3.3 Historical City Directories**

Local city directories identify the name of the individual or company located at a given address. CREtelligent ordered a local street directory search from ERIS, which is included in the <u>Appendices - Historical Resources</u>. The following local city directories were reviewed:

YEAR RANGE	SUBJECT PROPERTY - OCCUPANTS LISTED	ADJACENT - OCUPANTS LISTED
1941-1970	No listings were identified for the current and/or former addresses of the Subject Property in this year range.	No listings were identified for the current and/or former addresses of the adjoining properties in this year range.
1975-1985	The existing Garden Apartments were identified in the directories for this year range.	Residential listings were identified for properties surrounding the Subject Property.
1990-2022	The existing Garden Apartments were identified in the directories for this year range.	North - BP Gas Station (200 East 2nd Avenue) East - Multi-tenant professional office building (413 Brentwood Street) South - Residential development West - Residential development

# 3.4 Historical Topographic Maps

Historical topographic maps can indicate whether an area is undeveloped, lightly developed or heavily developed. They can also indicate if roads, railroad tracks, quarrying operations or water bodies were previously or near a property. CREtelligent reviewed the following topographic maps, relevant portions of which are included in <u>Appendix - Historical Resources</u>.

YEAR RANGE	DESCRIPTION
1941-1969	The Subject Property appears to be primarily undeveloped, with the exception of two small residential structures along the northern portion of the site. Adjoining properties are primarily undeveloped land with scattered residential development. The remainder of the surrounding area is undeveloped.
1969-2022	The Subject Property is shown to be improved with the current multifamily structures. Adjoining properties include several small retail businesses to the north, and vacant land with scattered residential development to the east, south and west.



# 3.5 Historical Use Summary

A summary of historical review for the Subject Property is provided below:

The Subject Property was primarily undeveloped land, with two small residential structures along the northern portion of the Subject Property until the prior residences were razed in preparation for construction of the existing multifamily developments in 1975.

No prior usage of the Subject Property was identified that would be considered a REC.

A summary of our historical review for the adjacent properties is provided below:

The northern, southern, eastern, western adjacent property was initially developed for residential use sometime between 1938 and 1941. The existing BP Gas Station (200 East 2nd Avenue) to the north was reportedly constructed in 1989. The existing multi-tenant professional office building (413 Brentwood Street) toe east was reportedly constructed in 1990

No prior usage of the adjacent properties was identified that would be considered a REC for the Subject Property. Please refer to <u>Section 4.2</u> for further discussion regarding the regulatory listings associated with the adjoining BP Gas Station.

Please see Appendix - Historical Resources to review these resources in their entirety.



#### 4.0 ENVIRONMENTAL RECORDS REVIEW

CREtelligent reviewed regulatory database records provided by a third-party vendor (Appendix <u>Regulatory Database</u> <u>Record Report</u>). Results specific to the Subject Property are presented in Section 4.1.1 Subject Property Regulatory Database Review while the results specific to off-site properties are presented in Section 4.1.2 Off-Site Regulatory Database Review.

For the purposes of this assessment, the potential for vapor migration that may represent a REC to the Subject Property was evaluated by the environmental professional using a limited screening method based on the type of contaminant, location of contaminant (or release) with relation to the subject property, documented extent of chemicals in subsurface, and groundwater flow direction. In addition, screening tools created by regulatory agencies (EPA and various state agencies) may be used to evaluate the significance of a release with respect to the vapor migration and/or vapor intrusion potential concerns. This screening approach is not to be confused with a human health risk assessment, but rather a conservative approach at assessing if a possible risk exists.

#### 4.1 Subject Property Regulatory Database Review

The results of the regulatory database search were reviewed by the environmental professional specific to the Subject Property as well as "orphan or non-plottable" sites which may contain findings specific to the Subject Property. If warranted, additional review of available regulatory files, on-line information, and/or client provided information is additionally presented to provide an environmental professional opinion on the potential environmental risk associated with the identified regulatory finding. The following records were identified on the Subject Property.

DATABASE	SITE NAME	ADDRESS
Spills	"Department of Public Works" (BRDPW)	N/A

The SPILLS listings stated that raw sewage was released from a manhole on the Subject Property in January 2015, and raw sewage was released along the side of an apartment building in February 2017. In 2015, the BRDPW reported a stoppage in the city's main collection line that was repaired. The Public Works cleaned the sewage release in the manhole and the incident was closed. The 2017 release was also addressed by the Public Works, cleaned, and the incident closed. Given the nature of the reported spill incidents and the regulatory status, these listings are not considered a REC.

# 4.2 Off-Site Regulatory Database Review

CREtelligent has reviewed the findings of the ASTM regulatory database search. This information was screened for potential environmental relevance. Sites/listings of greatest significant are discussed in the table below.

Properties identified in the regulatory database search but not discussed in further detail were not identified as an increased environmental risk to the Subject Property for one or more of the following reasons:



a) Site(s) only hold an operating permit with no documented violations and/or releases;

b) Site(s) have been granted "No Further Action" by applicable regulatory agency and/or Corrective Action is on-going under the guidance of applicable regulatory agency and/or subject property was not identified as a responsible party, contributor, or off-site impact;

c) Site(s) had no documentation indicating they impacted the Subject Property's soil, groundwater, and/or vapor media;

d) Site(s) distance and/or topographic position relative to the subject property reduces the level of potential risk associated with the site(s), and/or

e) RCRA TSD facilities reviewed and identified to NOT be hazardous waste generators.

The following records of greatest significance were identified on adjacent and/or surrounding properties:

DATABASE	SITE NAME	ADDRESS	DIST. (FT) / DIR.	ELEV. DIFF. (FT)	RISK
UST/LUST	BP Filling Station	(XXXXX East 2nd Avenue)	Adjacent/North	5	

This facility currently maintains three 10,000-gallon gasoline USTs that were reportedly installed in 1989. According to the review of regulatory files associated with this site, UST compliance inspections conducted in 2015, 2016, 2016, 2018, and 2022 citing many UST system maintenance violations including equipment failure, failure to maintain secondary containment, failure to operate UST system to prevent spills and/or overfills, and failure to maintain under-dispenser containment in good condition; the generation of non-halogenated hazardous waste from 2001 through 2023, and as a closed LUST case site.

This site is listed on the LUST database due to a release discovered in November 1996. A site assessment was conducted at that time and remediation commenced in January 1997. The leak was determined to be from the product piping which was reportedly removed and replaced with new fiberglass piping. During removal, soil excavation was conducted and soil samples were obtained. Soil samples collected from the over-excavation, confirmed contaminated soil had been successfully removed. Excavated soil was successfully bioremediated at the site and used as backfill. The regulatory agency issued a site closure letter in January 1998.

Another LUST case was opened in September 2013 and was subsequently closed in March 2014. On September 11, 2013, soil samples were obtained as part of a due diligence investigation. Analytical results identified concentrations up to 1,190 ppm TPHd under one of the tanks and 880 ppm under the dispenser. A total of 12 soil samples were collected below the UST/ dispenser/piping area (Soil Samples #1- #12). Soil sample concentrations at the dispenser were identified to be 370 ppm and 880 ppm TPHd at two and six feet, respectively, and samples under the tank were 1,190 ppm at 2 feet and 124 ppm TPHd at 6 feet below the UST. All other soil samples collected were non-detect (ND) for BTEX, MTBE, ETBE, DIPE, TAME, and TBA.



DATABASE	SITE NAME	ADDRESS	DIST. (FT) / DIR.	ELEV. DIFF. (FT)	RISK
In October 2013, three soil borings (B-1, B-2, B-3) were advanced in the area of the former dispenser area (B-1) and two in the vicinity of the fill end of the tank (B-2, B-3) to depths between 20 and 30 feet (ft) below grade (bg). Soil samples were analyzed for diesel-range hydrocarbons (C11-C22) using EPA Method 8015B and volatile organic compounds and oxygenates using EPA method 8260B. All samples were non-detect (ND) for all constituents tested. The stockpiled soil removed and was also characterized and 12.1 ppm TPHd was detected in stockpile sample S#6. Groundwater was not encountered during the drilling to the maximum depth explored (30 ft bg).					
The three soil borings were advanced in October 2013 and subsurface conditions in the former UST area were found to contain minimal subsurface hydrocarbon concentrations remaining in situ. The consultant indicated further delineation or assessment of soil conditions was not warranted. Based on the data, it was concluded that TPHd detected in soil samples was					

Based on the prior investigations conducted, the presumed groundwater flow direction (northeast), the intervening distance of the tank hold to the boundaries of the Subject Property (over 200 feet) and the lack of current release incidents or ongoing remediation/cleanup, this site is not considered a REC to the Subject Property.

limited, and further assessment and/or remediation was not warranted. Remediation was not conducted at this second

# 4.3 State Environmental Superliens

location. A case closure letter was issued on March 7, 2014.

CREtelligent searched the NETR Online Environmental Lien and AUL State Statutes website to determine if State has an environmental superlien which would allow environmental authorities the right to place a first priority lien on the Subject Property.

The Subject Property is not located in a State that has a statute imposing a super priority lien for clean up of hazardous waste.



#### **5.0 INTERVIEWS & USER PROVIDED INFORMATION**

According to ASTM E1527-21 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), certain items should be researched by the prospective landowner or grantee, and the results of such inquiries provided to the Environmental Professional preparing the ESA for his/her consideration.

The table below outlines information that CREtelligent requested in our effort to identify or alleviate possible RECs in connection with the Subject Property. Information provided by the User (if any) is summarized below the table.

USER PROVIDED INFORMATION	NOT PROVIDED BY USER	PROVIDED BY USER
User Questionnaire		~
Title Records	~	
Environmental Cleanup Liens or AULs		~
Specialized Knowledge		~
Valuation Reduction for Environmental Issues		~
Prior Environmental Reports	~	
Other	•	

- No information was provided at the time of the report
- The user questionnaire was completed by the current owner of the Subject Property, dated October 23, 2023.
- The Subject Property was identified as a Multifamily. No change of property use is anticipated at this time.
- User indicated the reason for conducting the Phase I ESA was to assist in the underwriting of a proposed mortgage loan backed by the Subject Property.

#### 5.1 Interviews

Interviews were conducted with various individuals knowledgeable of the subject property. The interviews were conducted to determine an awareness of any recognized environmentally-related problems or concerns at the subject property. Specific information obtained from the noted individuals appears in the appropriate sections of this report.



The information gained from the interviews conducted by CREtelligent for this ESA were obtained from sources considered reliable and believed to be true and correct. However, CREtelligent has made no independent investigation as to such matters and undertakes no responsibility for the accuracy of these items.

TITLE	COMMENTS
Seller Questionnaire	Returned to CREtelligent on October 23, 2023. No environmental concerns were noted based on the information included in the returned questionnaire.
Owner	At the time of the ESA, the owner not available for interview.
Current Site Manager, Occupants, or Employees	At the time of this investigation, the property manager was available for interview. The property manager has been associated with the property for five years. No environmental concerns were identified during the interview.
Past Site Manager, Occupants, or Employees	At the time of the ESA, past site manager, occupants, or employees were not available for interview.
State/Local Agency	Interviews with State/Local agencies were summarized in <u>Section 3.5</u> .
Other	At the time of the ESA, other individuals were not available for interview.

# 5.2 Summary of Previous Investigations

No copies of previous investigations or other environmentally-related information about the Subject Property was provided by the Client.

Please see <u>Appendix - Client Provided Information</u>.

#### 5.3 Agency Records Review

The purpose of the additional regulatory agency file review is to obtain sufficient information to assist CREtelligentpersonnel in determining if a REC, HREC, CREC, BER, or a De Minimis condition exists at the Subject Property in connection with the identified database listings. Pertinent regulatory files and/or records received by the date of this report have been added into <u>4.0 Environmental Records Review</u>. The following additional environmental records were reviewed to supplement the standard environmental record database search.



#### **Local Agencies**

DATE REQUESTED	RESOURCE	COMMENTS
10/23/23	City	A response was received and no records were on file for the subject property.
10/23/23	City Permit Department	Files were available for the subject property. See Appendix Regulatory Agency Records.
10/24/23	County	Files were available for the subject property. See Appendix Regulatory Agency Records.
10/23/23	Fire Department	Files were available for the subject property. See Appendix Regulatory Agency Records.

Please see Appendix-<u>Regulatory Agency Records</u>.



#### **6.0 FIELD RECONNAISSANCE**

A visual review of the Subject Property was completed to document site conditions and identify recognized environmental conditions. The reconnaissance was completed on .

The site reconnaissance included a systematic evaluation of the property exterior was conducted in a manner consistent with the ASTM standard. Property interior was comprehensively assessed with exception of the items in the table below. Photographs are provided in the Subject Property Photographs of this report.

#### 6.1 Subject Property Observations & Limitations

The following lists the areas of the subject property that were or were not accessible during our site visit.

Site Escort:	Maintenance Supervisor
What locations on the Subject Property <b>WERE NOT</b> observed/inspected to evaluate the environmental condition of the Subject Property? (not accessible)	All locations on the subject property were made accessible to the site inspector, including 25% of the resident units.
Were there any discrepancies noted in property boundary? Different from the image provided?	No discrepancies were noted in the property boundaries.
Were adjacent properties observed from the Subject Property premises? Were any items of environmental concern identified?	All adjacent properties were observed from the subject property premises, and no items of environmental concern were identified.
Limiting conditions to the site visit:	None
If yes, please describe:	N/A

#### **Units Inspected**

A representative sample of residential units were accessed and observed by CREtelligent, including the following:

	UNITS OBSERVED	
Building 1/Unit 2	Building 1/Unit 3	Building 1/Unit 5
Building 1/Unit 8	Building 1/Unit 11	Building 1/Unit 12
Building 1/Unit 15	Building 2/Unit 5	Building 2/Unit 6

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	UNITS OBSERVED	
Building 2/Unit 8	Building 2/Unit 9	Building 2/Unit 14
Building 3/Unit 5	Building 3/Unit 6	Building 3/Unit 10
Building 3/Unit 11	Building 3/Unit 15	Building 4/Unit 3
Building 4/Unit 6	Building 4/Unit 8	Building 4/Unit 12
Building 5/Unit 3	Building 5/Unit 7	Building 5/Unit 10
Building 5/Unit 15	Building 6/Unit 3	Building 6/Unit 4
Building 6/Unit 8	Building 6/Unit 11	Building 6/Unit 12
Building 6/Unit 14		

# 6.2 Observations Checklist

The following are the observations that were collected specifically to the ASTM inspection criteria for "*Interior and Exterior Observations*".

ASTM OBSERVATIONS	OBSERVED	RISK
Hazardous Substances and Petroleum Products in Connection with Current Business Type	Yes	
Hazardous Substance and Petroleum Product Containers Not in Connection with Current Business Type	No	
Storage Tanks (UST/ASTs)	Yes	
Strong, Pungent, or Noxious Odors	No	
Standing Surface Water and Pools or Sumps Containing Liquids Likely to be Hazardous Substances or Petroleum Products	No	
Drums, Totes, and Intermediate Bulk Containers	No	
Unidentified Substance Containers	No	



ASTM OBSERVATIONS	OBSERVED	RISK
PCB Containing Items	Yes	
Heating/Cooling	Yes	
Stains or Corrosion on Floors, Walls, or Ceilings (Interior)	No	
Stained Soil or Pavement (Exterior)	No	
Drains, Sumps, and Wastewater	No	
Pits, Ponds, or Lagoons	No	
Stressed Vegetation (other than insufficient water)	No	
Solid Waste (e.g., construction debris, demolition debris, or other solid waste disposal, or mounds or depressions suggesting trash or other solid waste disposal) Not trash dumpsters	No	
Wells (e.g, dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	No	
Septic Systems (on-site septic systems or cesspools)	No	

#### **Observations Summary**

ASTM OBSERVATIONS	COMMENTS
Hazardous Substances and Petroleum Products in Connection with Current Business Type	Limited amounts of cleaning supplies, paints, pool chemicals, and other chemicals used as part of general maintenance at the property/complex are present. These products are used in small quantities and the storage conditions appeared satisfactory.
Storage Tanks (USTs/ASTs)	CREtelligent noted the presence of two underground propane tanks. The tanks are located to the north of the office/clubhouse and are used to fuel the dryers in the laundry facility. At normal temperatures and pressure, propane is a gas and, therefore a release would not impact soils or groundwater. While the propane tanks could be considered a fire or safety concern, the presence of this type of tank is not considered to represent a REC.



ASTM OBSERVATIONS	COMMENTS
PCB Containing Items	Numerous pad-mounted electrical distribution transformers are located on the Subject Property. At the time of CREtelligent's site reconnaissance, the transformers were observed to be in good condition with no signs of leaks or staining. Based on the pre-1979 date of construction of the property improvements, it is possible that PCB-containing electrical equipment is present. Based on correspondence with the customer service department, the electrical equipment is owned by the local utility company, which maintains operational responsibility for the equipment and any associated issues. was not able to confirm the presence or absence of PCBs; however, in accordance with Freddie Mac guidelines, based on confirmed ownership and operational responsibility of the transformers by , no further action is required at this time.
Heating/Cooling	The heating, ventilation and air conditioning (HVAC) systems are electric, packaged systems including individual tenant unit exterior ground-mounted condensers and interior air handler closets. No evidence of past or present heating oil usage was identified
Please see Appendix-Subject Property	Photographs for additional perspective.



#### 7.0 ASTM NON-SCOPE CONSIDERATIONS

The ASTM Standard recognizes that there may be environmental issues or conditions at a property that parties may wish to consider. These are considered ASTM Non-Scope Considerations. The scope of services for this assessment included the following:

# 7.1 Asbestos Containing Material

Asbestos is the name given to a number of naturally occurring, fibrous silicate minerals mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. The Occupational Safety and Health Administration (OSHA) regulation 29 CFR 1926.1101 requires certain construction materials to be presumed to contain asbestos, for purposes of this regulation. Construction materials including, but not limited to, thermal system insulation (TSI), surfacing material, and asphalt/vinyl flooring that are present in a building and that have not been appropriately tested may be considered "presumed asbestos-containing material" (PACM).

Local, State, and Federal regulations indicate that any building material, regardless of age, should be presumed to contain greater than 1% Asbestos Containing Material (ACM). As a result, it is always advisable to conduct an asbestos survey prior to the disturbance of building materials to confirm the presence or absence of ACMs at a property.

Based on the pre-1981 date of construction, it is possible that friable and non-friable ACM are present on the Subject Property. Suspect materials observed by CREtelligent include friable popcorn ceiling texture and non-friable wallboard and joint compound, vinyl floor tile, vinyl sheet flooring, mastic, and roofing materials. The observed materials were in good condition. It should be noted that the popcorn ceiling texture was observed to be encapsulated under several layers of fresh paint and the potential for fiber release is low.

#### 7.2 Radon

Radon is an odorless, colorless, tasteless radioactive gas that occurs from the natural breakdown (radioactive decay) of radium, uranium and thorium. The United States Environmental Protection Agency (EPA) has specified a Radon action level of 4.0 picocuries per liter of air (pCi/L). The health risk associated with radon is its potential rate of accumulation within confined areas, particularly confined areas near or in the ground, such as basements, where vapors can readily transfer to indoor air from the ground through foundation cracks or other pathways. Indoor gas levels depend primarily on the underlying geological forations and building construction characteristics. Large, adequately ventilated rooms generally present limited risk for radon exposure.

In accordance with the 2023 Enterprise Multifamily Radon Policy, short-term radon testing was completed within 25% of ground contact residential units, with no less than one unit per building.



The on-site radon measurement activities were conducted by (radon professional), a radon measurement professional credentialed by the National Radon Proficiency Program (NRPP) and licensed by the State of (Site State), between October 24, 2023 and October 27, 2023. A total of 25 passive charcoal adsorption measurement devices were deployed within 25 ground contact residential units within 12 buildings.

LOCATION (BUILDING/UNIT)	RADON CONCENTRATION (PCI/L)
Building 1/Unit 2	1.2 pCi/L
Building 1/Unit 4	1.1 pCi/L
Building 1/Unit 5	2.0 pCi/L
Building 1/Unit 8	3.4 pCi/L
Building 1/Unit 10	4.2 pCi/L
Building 2/Unit 3	3.5 pCi/L
Building 2/Unit 6	6.0 pCi/L
Building 2/Unit 7	2.8 pCi/L
Building 2/Unit 9	1.5 pCi/L
Building 3/Unit 1	2.5 pCi/L
Building 3/Unit 4	3.2 pCi/L
Building 3/Unit 5	5.2 pCi/L
Building 3/Unit 9	4.1 pCi/L
Building 4/Unit 1	2.6 pCi/L
Building 4/Unit 3	3.2 pCi/L
Building 4/Unit 6	1.2 pCi/L
Building 4/Unit 8	1.2 pCi/L
Building 5/Unit 4	2.1 pCi/L



LOCATION (BUILDING/UNIT)	RADON CONCENTRATION (PCI/L)
Building 5/Unit 5	5.3 pCi/L
Building 5/Unit 6	3.4 pCi/L
Building 5/Unit 9	4.0 pCi/L
Building 6/Unit 4	1.2 pCi/L
Building 6/Unit 7	1.3 pCi/L
Building 6/Unit 8	1.8 pCi/L
Building 6/Unit 9	2.0 pCi/L

According to the analytical results, six of the units tested were determined to have radon concentrations that meet or exceed the EPA action level of 4.0 pCi/L.

A copy of the radon laboratory report is included in the appendices.

# 7.3 Lead Based Paint

Lead is a highly toxic metal that affects human health. Lead-Based Paint (LBP) is defined as any paint, varnish, stain, or other applied coating that has 1 mg/cm2 (or 5,000 ug/g or 0.5% by weight) or more of lead. Congress passed the Residential Lead-Based Paint Hazard Reduction Act of 1992, also known as "Title X", to protect families from exposure to lead from paint, dust, and soil. Under Section 1017 of Title X, intact LBP on most walls and ceilings is not considered a "hazard," although the condition of the paint should be monitored and maintained to ensure that it does not become deteriorated. Further, Section 1018 of this law directed the Housing and Urban Development (HUD) and the US EPA to require the disclosure of known information on LBP and LBP hazards before the sale or lease of most housing built before 1978.

Due to the age of the Subject Property, constructed in 1975, there is a potential that LBP is present. All observed painted surfaces were in good condition and are not expected to pose a health and safety concern to the occupants of the Subject Property at this time.

#### 7.4 Lead in Drinking Water

Lead in drinking water typically comes from lead elements in the plumbing, and not from the local treatment plant or well. Many buildings built in the early 1900s used lead pipes for interior plumbing. Lead piping was also used for many service connections that join to public water supplies. In 1986, restrictions on the use of lead pipes for drinking

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water supplies were developed. The lead pipes were replaced with copper pipes, however, lead solders and flux were often used to join the pipes, and the lead solder is a major cause of lead contamination in drinking water today. Since 1988, solder that has a lead content over 0.2 percent cannot be used for joints or fittings in any private or public drinking water system. Faucets themselves may also be a significant source of lead contamination. Chrome-plated faucets are generally made of brass, which contains 3 to 8 percent lead, and contamination can occur when water comes in contact with these fixtures. An additional cause for lead in drinking water is from drinking water coolers.

The EPA has established an 'action level' of 15 parts per billion (ppb) for lead in tap water. Since much of the lead contamination in drinking water comes from the internal building lines, rather than from the water supply itself, a maximum contaminant level is no longer in place for lead. Those at the greatest risk of lead contaminated water are young children and pregnant women. Sampling for lead in drinking water was not within the scope for this assessment. Water supplied to the Subject Property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper.

# 7.5 Mold

Molds are microscopic organisms found virtually everywhere, indoors and outdoors. Mold will grow and multiply under the right conditions, needing only sufficient moisture (e.g. in the form of very high humidity, condensation, or water from a leaking pipe, etc.) and organic material (e.g., ceiling tile, drywall, paper, or natural fiber carpet padding).

CREtelligent observed interior areas of the Subject Property building in order to identify the significant presence of mold. CREtelligent did not note obvious visual or olfactory indications of the presence of mold, nor did CREtelligent observe obvious indications of significant water damage.

No sampling of suspect surfaces was conducted as part of this assessment and no additional action with respect to mold appears to be warranted at this time. This visual survey was not designed to discover all areas which may be affected by mold growth on the subject property. Rather, it is intended to give the Client an indication if significant (based on observed areas) mold growth is present at the subject property. Additional areas of mold not observed as part of this limited assessment, possibly in pipe chases, HVAC systems, and behind enclosed walls and ceilings, may be present on the Subject Property.

#### 7.6 Wetlands

Wetlands are areas where water covers the soil, or is present either at or near the surface of the soil throughout the majority of the year. Within the United States wetlands are regulated at a federal (USACE, EPA) and state level. unpermitted filling or alteration of wetlands can lead to notice of violations and fines. A wetland delineation survey was beyond the scope of this assessment.

CREtelligent reviewed the applicable United States Fish and Wildlife Service National Wetlands Inventory (NWI) map. Based on this information, no wetland resources were identified on or adjoining the Subject Property.

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# 7.7 Flood Zone

CREtelligent reviewed available FEMA Flood Insurance Rate Maps (FIRM) and the United States Fish and Wildlife Service National Wetlands Inventory (NWI) website, in an attempt to determine if the Subject Property was located in a flood hazard area. This screening was based on a and should not be considered a formal flood hazard determination.

Based on the review of the aforementioned sources, the Subject Property is located within Zone X Unshaded, defined as areas of minimal flood hazard.



#### 8.0 ABOUT THIS ENVIRONMENTAL SITE ASSESSMENT REPORT

On December 1, 2023, Sample Client Name retained CREtelligent to conduct a Phase I Environmental Site Assessment of the property at Property Address, City, State, Zip (herein, the "subject property"). This assessment was performed in general conformance with ASTM E1527-21, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," following all prescribed methodologies and protocols detailed in this Practice.

Any environmental Site Assessment that meets or exceeds the above-described methods is presumed valid under all applicable standards. Any exceptions to, or deletions from, this Practice are described in this report.

This report is valid for 180 days beginning January 20, 2024.

#### 8.1 Purpose

This Phase IESA is intended to assist the user in identifying Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs), Historical Recognized Environmental Conditions (HRECs), de minimis conditions, and Business Environmental Risks (BERs) as defined by ASTM E1527-21.

A REC, as defined in ASTM E1527-21, 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* 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, as defined in ASTM E1527-21, 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 implementation of required controls (for example, *activity and use limitations* or other *property use limitations*)."

A HREC, as defined in ASTM E1527-21, 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 *subject property* to any controls (for example, *activity and use limitations* or other *property use limitations*). A *historical recognized environmental condition* is not a *recognized environmental condition*."

A de minimis condition, as defined in ASTM E1527-21, is "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 appropriate governmental agencies. A condition determined to be a *de minimis condition* is not considered a *recognized environmental condition (REC)* nor a *controlled recognized environmental condition (CREC)*.



A BER, as defined by ASTM E1527-21, is a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.

#### 8.2 Scope of Work

In accordance with ASTM Practice E1527-21, CREtelligent's assessment activities included: 1) a review of available historical resources (e.g. historical aerial photographs, city directories, and fire insurance maps; 2) a review Federal, State, County, and Local regulatory agency records; 3) a review of a regulatory database report provided by a third-party vendor; 4) onsite reconnaissance of the subject property and adjacent/adjoining properties; and 5) interviews, when reasonably possible, with onsite personnel and the subject property owner(s).

During the site visit, a CREtelligent representative conducted site reconnaissance to assess the possible presence of petroleum products and/or other hazardous materials on the subject property and made every reasonable effort to interview site personnel about current and past subject property use.

#### 8.3 Report Reliance

In accordance with the terms of CREtelligent's Client Services Agreement, which governs the nature, scope, and purpose of this ESA, all reports, both verbal and written, are for the sole benefit of Sample Client Name, Fannie Mae, and their affiliates, successors and assigns. Other parties may not rely on this report without written consent from CREtelligent.

Third parties coming into possession of all or part of this report, whether verbal or written, must obtain written permission from CREtelligent for report reliance. Specific conditions and fees may apply to third-party reliance letters. In the absence of a written agreement with CREtelligent, no third party shall have any rights of recourse or recovery whatsoever under any course of action against CREtelligent, its officers, employees, vendors, successors or assigns. Any such unauthorized user shall be responsible to protect, indemnify and hold CREtelligent as well as Sample Client Name and their respective officers, employees, vendors, successors, and assigns harmless from any and all claims, damages, losses, liabilities, expenses (including reasonable attorneys' fees) and costs attributable to such report reliance. Unauthorized use of this report shall constitute acceptance of and commitment to these responsibilities, which shall be irrevocable and shall apply regardless of the cause of action or legal theory pled or asserted. Additional legal penalties may apply for unauthorized use of this report.

All facsimile transmissions, accompanying documents, and signatures shall be treated as original documents and shall bind and inure the parties involved in this agreement.



# 8.4 Significant Assumptions

While compiling this report, CREtelligent has assumed the veracity of sources of information widely considered within the industry to be authoritative, true, and correct. Nevertheless, CREtelligent has conducted no independent survey of the subject property nor made any independent investigation verifying the veracity of its sources. CREtelligent assumes no responsibility for the accuracy of these sources. All descriptions of dimensions, capacities, quantities, distances, historical site use, and ownership history information gathered from these sources are provided to assist the Client in visualizing the property and evaluating its likely exposure to environmental risk.

Further, it is assumed that all environmental site assessments contain data gaps. Data gaps that may be filled in by reasonable inference or that are unlikely to have a material effect on the environmental health of a property are considered insignificant and have been identified as such throughout this report. Significant data gaps, such as the current disposition of an environmental cleanup action or the number of hazardous materials used, stored, and/ or hazardous waste generated on the subject property, are also identified and discussed. Significant data gaps may result in a recommendation for further assessment.

# 8.5 Limitations

CREtelligent warrants that the findings and conclusions contained herein were accomplished in accordance with the methodologies set forth in ASTM Practice E1527-21 at "Scope of Work." These methodologies are described as representing good commercial and customary practice for conducting an ESA of a property for the purpose of identifying recognized environmental conditions. However, even with the proper application of these methodologies, conditions may exist on the subject property that could not be identified within the scope of the assessment or which were not reasonably identifiable from available information. Further, the conclusions and findings set forth in this report are strictly limited in time to the date of the evaluations. The conclusions presented in the report are based solely on the services described therein, and not on scientific tasks or procedures beyond the scope of agreed-upon services or the time and budgeting restraints imposed by the Client. CREtelligent makes no other warranty, either expressed or implied.

Some of the information provided in this report is based upon personal interviews, and research of available documents, records, and maps held by the appropriate government and private agencies. This report is therefore subject to the limitations of historical documentation, availability, and accuracy of pertinent records, and the personal recollections of those interviewed.

ASTM Practice E1527-21 does not address requirements of any state or local laws or of any federal laws other than the all-appropriate inquiry provisions of the landowner liability protections. Further, this report does not intend to address all possible safety concerns, if any, associated with the subject property. While CREtelligent may comment on such matters, this report may not be construed as or used to certify that conditions on the subject property do not pose safety or health risks to its occupants or their visitors.



# 8.6 Limiting Conditions

No ESA can wholly eliminate uncertainty about whether environmental concerns affect the subject property. This report, therefore, is intended to reduce rather than eliminate uncertainty.

The performance of this ESA does not, in and of itself, meet the eligibility requirements qualifying landowners for certain liability protections set forth in 40 Code of Federal Regulations (CFR), Part 312, and authorized under the CERCLA.

Conditions may exist which were not identified as a result of our site reconnaissance or review of available historical and regulatory resources which might otherwise impact our conclusions concerning the condition of the subject property. Any conditions discovered or revealed which were not identified during the completion of this assessment should be reported to CREtelligent upon discovery and may impact the conclusions and recommendations of this Report.

CREtelligent utilized limited information concerning regulatory compliance in the preparation of this ESA report; however, this report is not intended as a compliance audit and may not be assumed to be, relied upon, or otherwise utilized as evidence of regulatory compliance.

In addition, the findings and conclusions expressed in this report are subject to all the limitations inherent to the methodologies prescribed in ASTM Practice E1527-21. Specific limitations, such as the unavailability of owner contact information, responses to FOIA requests not made available within agreed-upon service deadlines, areas inaccessible to the CREtelligent inspector at the time of site reconnaissance, etc. are noted and their impact discussed in the appropriate sections of this report.

#### 8.7 Limitations of Liability

CREtelligent's liability, if any, for any claim, costs, loss or damage resulting from CREtelligent's negligence, if any, relating to this agreement or the work performed pursuant hereto shall not exceed the amount of the payment(s) actually received by CREtelligent hereunder; provided, however, CREtelligent's liability, if any, for claims involving "professional liability", "general liability" or "pollution liability" shall not exceed the amount of insurance maintained by CREtelligent. CREtelligent currently maintains (i) professional liability insurance, general liability insurance, and pollution liability insurance in the amount of \$1,000,000 and an umbrella liability policy in the amount of \$2,000,000.

#### 8.8 Data Gaps

A data gap is defined as the "lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information."

CREtelligent did not encounter any data gaps during this assessment:



#### 9.0 TERMS AND ACRONYMS

Terms and Acronyms	Description
Adjacent Property	Any real property or properties the border of which is contiguous or partially contiguous with that of the subject property, or that would be contiguous or partially contiguous with that of the property but for a street, road, or other public thoroughfare separating them.
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
AUL	Activity and Use Limitation
BER	A BER, as defined by ASTM E1527-21, is a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice.
BGS	Below Ground Surface
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes
CDL	Clandestine Drug Lab
CERCLIS	Comprehensive Environmental Response Compensation and Liability Information System
сос	Contaminant of Concern
CREC	A CREC, as defined in ASTM E1527-21, is "a recognized environmental condition affecting the <i>subject property</i> that has been addressed to the satisfaction of the applicable regulatory authority or authorities with <i>hazardous substances</i> or <i>petroleum products</i> allowed to remain in place subject to implementation of required controls (for example, <i>activity and use limitations</i> or other <i>property use limitations</i> )."
Data Gap	A data gap, as defined in ASTM E1527-21, is the "lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information."
De Minimis Condition	A de minimis condition, as defined in ASTM E1527-21, is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be De Minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.
ERNS	Emergency Response Notification System
FED ENG/FED INST	Federal Engineering Controls/Federal Institutional Controls
FOIA	Freedom of Information Act
FUDS	Formerly Used Defense Sites



	A HREC, as defined in ASTM E1527-21, 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
HREC	criteria established by the applicable regulatory authority or authorities without subjecting
	the <i>subject property</i> to any controls (for example, <i>activity and use limitations</i> or other <i>property</i>
	use limitations). A historical recognized environmental condition is not a recognized
	environmental condition."
ICIS	Integrated Compliance Information System
LST	Leaking Storage Tank
LPST/LUST	Leaking Petroleum Storage Tank   Leaking Underground Storage Tank
LUR	Land Use Restriction
MSL	Mean Sea Level
NFA/NFRA/NFRAP	No Further Action/No Further Remedial Action/No Further Remedial Action Planned
ND	None Detected
NOV	Notice of Violation
NPL	National Priorities List (aka Superfund)
РСВ	Polychlorinated Biphenyls
PCE/PERC	Perchloroethylene, Tetrachloroethylene, Tetrachloroethene
PRP	Potentially Responsible Parties List
PST	Petroleum Storage Tank
RCRA	Resource Conservation and Recovery Act
RCRA CESQG	RCRA Conditionally Exempt Small Quantity Generator
RCRA CORRACTS	RCRA Corrective Action
RCRA LQG	RCRA Large Quantity Generators List
RCRA NON GEN	RCRA Non-Generator
RCRA SQG	RCRA Small Quantity Generators List
RCRA TSD	RCRA non-CORRACTS TSD Facilities
	A REC, as defined in ASTM E1527-21, is "(1) the presence of <i>hazardous substances</i> or <i>petroleum</i>
	<i>products</i> in, on, or at the <i>subject property</i> due to a <i>release</i> to the <i>environment;</i> (2) the likely
DEC	presence of hazardous substances or petroleum products in, on, or at the subject property due
REC	to a <i>release</i> or likely <i>release</i> to the <i>environment;</i> or (3) the presence of <i>hazardous</i>
	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."
SEMS	Superfund Enterprise Management System
SUPERFUND ROD	Superfund Record of Decision
SWF/LF	Solid Waste Facility/Landfill
TRIS	Toxic Release Inventory Program
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program



VOC/HVOC	Volatile Organic Compound/Halogenated Volatile Organic Compound
USGS	United States Geological Survey