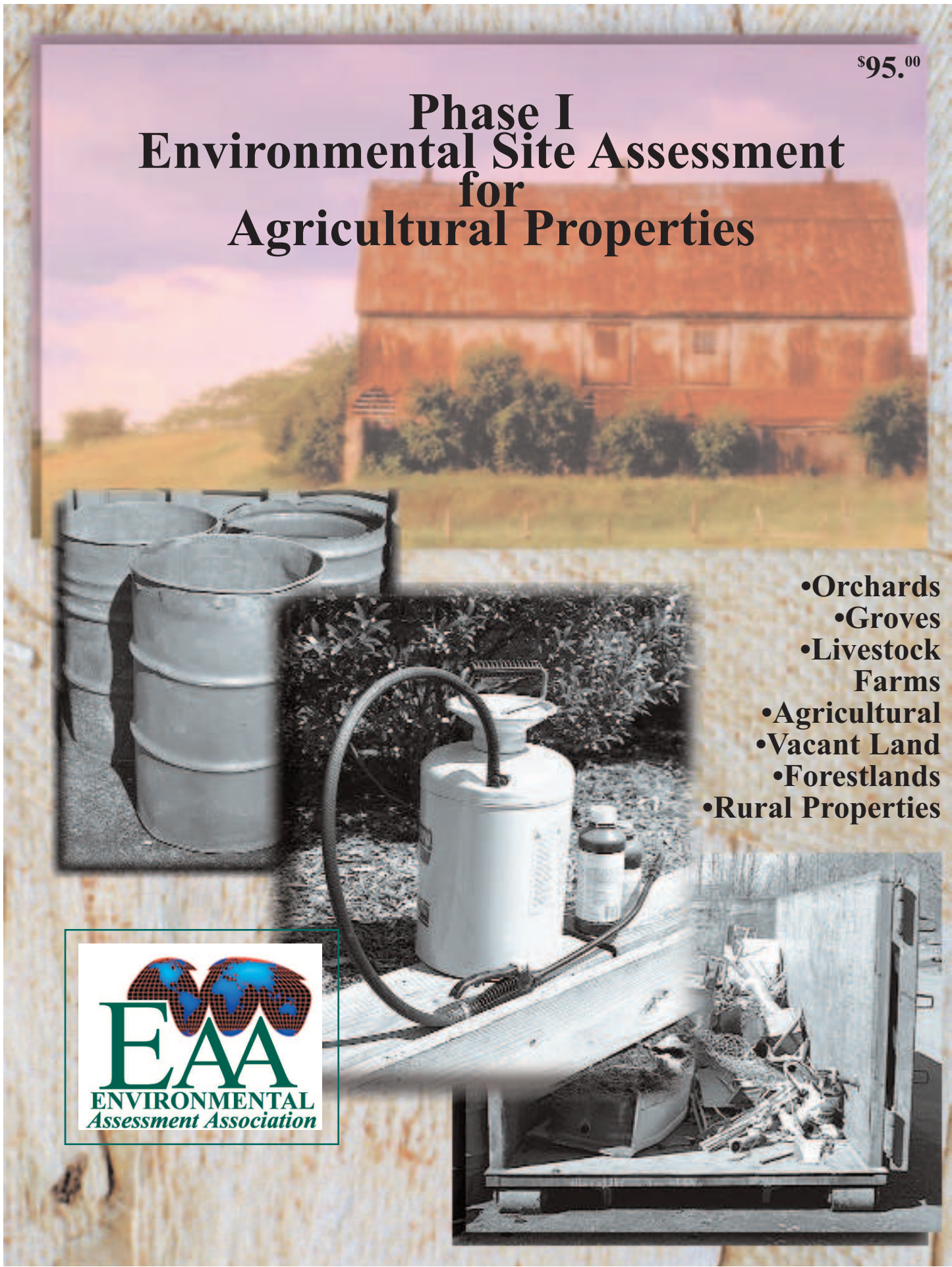


\$95.00

Phase I Environmental Site Assessment for Agricultural Properties

- Orchards
- Groves
- Livestock Farms
- Agricultural
- Vacant Land
- Forestlands
- Rural Properties





Who is EAA?

The Environmental Assessment Association - EAA is the largest organization of Phase I Environmental Service Providers in the world and continues to lead the way in providing guidance, education and support to this area of the environmental industry. EAA's membership from over thirty countries around the world includes: Phase I Site Assessors, Phase II sampling and testing specialists, laboratory personnel, full service remediation companies as well as brownfield redevelopment companies. Our membership also includes employees from Federal, State and Local governments.

EAA is a professional organization dedicated to providing its members with information, education and a professional designation in the field of Environmental Inspection. EAA awards members the "CEI - Certified Environmental Inspector," "CTS - Certified Testing Specialist," "CRS - Certified Remediation Specialist," and "CES - Certified Environmental Specialist" professional designations based on education and work experience criteria.

EAA works closely with many Federal and State agencies, including a current cooperative effort with the EPA for public education on radon, lead and asbestos. Educating FDIC Bank Examiners, setting guidelines on the ASTM E-50 Committee and training lending institutions on environmental compliance are some other examples of EAA's position at the forefront of the environmental industry.

Members of EAA range widely from appraisers and home inspectors to environmental engineers, attorneys and lenders. The material provided by EAA to members is designed to educate our members on environmental law, due diligence, changing regulations, new technologies and includes publications on how to perform an environmental inspection based on historical research and a visual examination of the property.

EAA continues to provide information to members throughout the membership year via publications such as the EAA newspaper, *Environmental Times*, special reports on specific environmental topics, "How to" books, updates and more. Seminars conducted by experienced professionals are presented in the United States and other countries in order to provide members the opportunity for one-on-one education.

EAA now offers its members access to the "Information Super Highway." Internet listings are available for members who want their company information available to the more than 35 million professionals who already access the Internet for information. This is the largest exposure ever available for environmental professionals.

Environmental services will continue to be a major industry in the new century and the Environmental Assessment Association is the leading provider of special information in this area. For more information on joining EAA, write to the association's headquarters at P.O. Box 879, Palm Springs, California 92263 USA. Phone: (877)743-6806, Fax: (760)-327-5631, E-mail: support@assoc-hdqt.org, Internet: <http://www.eaa-assoc.org>.





Environmental Assessment Association

EAA Membership Benefits

- 3 The Best Networking System for Environmental Professionals
- 3 Provides recognition through professional designations
- 3 Official membership card & certificate
- 3 Free environmental publications
- 3 Discounted Environmental Site History Reports
- 3 Environmental Times newspaper, the newsletter of EAA
- 3 Listing in EAA's Annual Membership Directory
- 3 EAA's listing of new business leads and referrals
- 3 Residential and commercial environmental inspection forms
- 3 Environmental guideline booklets
- 3 Monitoring of legislation
- 3 Environmental audit reports
- 3 Discounted environmental testing kits
- 3 Access to discounted group rate E&O Insurance
- 3 Access to EAA's Internet home pages and individual listing
- 3 Access to group hospital, medical and dental insurance
- 3 Invitations to educational seminars
- 3 EAA/ASTM updates
- 3 Invitation to the National Expo & Conference

CEI - Certified Environmental Inspector

CTS - Certified Testing Specialist

CRS - Certified Remediation Specialist

CES - Certified Environmental Specialist

CEM - Certified Environmental Manager

INTRODUCTION

By Bates Fountain, PE, CEI

When the Screening and Phase I Environmental Site Assessment Standards of Practice were adopted in the early 1990's, the practices only focused on commercial properties. A commercial property is one that produces income or is expected to produce an income, either now or in the future.

It was not the intent of the standards to satisfy the requirement of "all appropriate inquiry" on other types of properties, such as agricultural related lands, forestlands or rural properties. The Environmental Assessment Association has introduced this Environmental Site Assessment procedure, including appropriate questionnaires, for use on agricultural related lands, forestlands and rural properties. As you will conclude when you use EAA's procedure/questionnaires, EAA's procedures can be used on any type of property. This is further explained in the enclosed discussion, "an all inclusive Environmental Due Diligence Site Assessment."

As the need arises, EAA will be revising the questionnaires and adding additional ones, such as one on "non-CERCLA land issues" and perhaps another on "business risk issues."

In this document you will find three hypothetical case studies which are intended to assist you in learning how to use this process. These case studies are not necessarily complete, but collectively will be of benefit to a preparer. We hope that you will find this document interesting and of great value and that it will further result in continuing EAA's reputation as "the leader of the pack."

EAA realizes that improvement can always be made and we will always encourage you to make suggestions to this document.

Here's wishing each of you much continued and increasing success.

Bates

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Section I

**Chemical Contamination from
Pesticides - Fertilizers - Solvents**

Contamination of Agricultural Properties

Potential Contamination Problems

**Performing Environmental Site Assessments
on Agricultural Related Properties**

Chemical Contamination from Pesticides, Fertilizers, and Solvents

Chemical contamination from agricultural and golf course /country club applications, landfill disposal, land spreading of domestic /industrial wastes, storage, container disposal of chemicals the use of fertilizers, pesticides, and other chemical control products are an increasing environmental problem. The overall regulation of most of these chemicals is governed by the Insecticide, Fungicide and Rodenticide Act. The use of word chemical(s) will refer to the above mentioned materials.

In the past several years, increasing concern has arisen about the presence of chemicals in the environment and the threat they pose to man and wildlife. The use of chemicals also constitutes a very important aspect of up-to date processes, thus creating dependency on chemicals.

Most chemicals of concern in this study are toxic and therefore can be dangerous when misused. Contamination, fishkill, reproductive problems in animals, and severe illnesses in people have all been attributed to exposure to or ingestion of chemicals-usually as a result of improper application or careless disposal of the chemicals or their containers. Chemical losses from areas of application and contamination of no-target sites such as groundwater and surface water represent a monetary loss as well as a threat to the environment. Thus, proper management of chemicals in order to avoid environmental contamination is a top priority.

How do chemicals move from one area to areas where they are not wanted? There are basically two ways properly applied chemicals may reach other areas: runoff and leaching. Runoff is the physical movement of water perhaps contaminated- over the ground, such as rainwater, which does not penetrate into the soil. Leaching is the process whereby liquids are flushed through the soil by rain or irrigation water as it moves downward. Soils are permeable and therefore leaching can be a more serious problem than runoff.

A chemical may be taken up by a plant or ingested by animals, insects, worms, or microorganisms in the soil. It may move through the soil and either adhere to particles or dissolve. Depending on the chemical it may vaporize and enter the atmosphere or break down via microbial and chemical pathways into other less toxic compounds. The fate of a chemical in the soil depends on two of its properties: persistence and sorption.

Persistence defines the lasting-power of a chemical. Most chemicals breakdown or degrade over time as a result of several chemical and microbiological reactions in the soil. Also, sunlight breaks down some chemicals. Generally, chemical pathways result in only partial deactivation of chemicals, whereas soil microorganisms can completely break down many chemicals to carbon dioxide, water, and other inorganic constituents. Some chemicals produce intermediate substances as they degrade. The biological activity of these substances may also have environmental significance. Because populations of microbes decrease rapidly below the root zone, chemicals leached beyond this depth are less likely to be degraded. However, some chemicals will continue to degrade by chemical reactions after they have left the root zone.

Perhaps the single most important property influencing a chemicals movement with water is its solubility. When a chemical enters soil, some of it will stick to soil particles, particularly organic matter, through a process called sorption, and some will dissolve and mix with the water between soil particles. As more water enters the soil through rain or irrigation, the sorbed chemical molecules may be detached from soil particles through a process called desorption. The solubility results in less sorption.

In estimating chemical losses from soils and their potential to contaminate surface water or groundwater, it

is essential to consider simultaneously both persistence and sorption. Quantitative estimations of chemical losses via runoff or leaching require complex mathematical models. These models are solved using computers and utilize site specific soil and climatological information. This would include soil type and its physical chemical properties; the date, amount, and method of chemical application; the amount, duration, and frequency of rainfall or irrigations following the chemical application; and vegetation growth characteristics. In the absence of such information, however, a qualitative assessment of a chemical's potential to contaminate surface water or groundwater is possible using the sorption and persistence of the chemical.

Easily absorbed and persistent chemicals are likely to remain near the ground surface, increasing the chances of it being carried to surface water via runoff. In contrast, weakly-sorbed by persistent chemicals may be readily leached through the soil and are more likely to contaminate groundwater. For non-persistent chemicals, the possibility of groundwater or surface water contamination depends primarily on whether heavy rains/irrigation occur soon after a chemical application. Without water to move them downward, chemicals could remain within the biologically-active root zone and may be degraded readily. In terms of water quality then, certain chemicals may be considered "safe" because they are not readily leached and degrade fairly rapidly.

Agricultural use of pesticides should be part of an overall pest management strategy which includes biological controls, cultural methods, pest monitoring and other applicable practices. When a pesticide is needed its selection should be based on effectiveness, toxicity to non-target species, cost, and site characteristics, as well as its solubility and persistence. An important purpose of the pesticide container label is to instruct users to apply the pesticide safely and with minimum threat to non-target species, both on and off the application site. Pesticide users assume responsibility to follow label instructions. It is unsafe and unlawful not to do so.

A requirement of an environmental risk assessment is to consider properties, not only adjacent to the subject property, but those within one mile upstream in the direction of the flow of the groundwater, as well as any surface water flow from any direction that flows on or nearby the subject property. It is important that in addition to present land uses, research be done on a 30 year land use basis where agricultural, commercial and, industrial uses could possibly have occurred.

The following, real life contamination problem, illustrates the importance of research that must be done as part of a viable environmental risk assessment. We are not just talking about big industrial polluters, but the mom-and-pop businesses as well.

For decades the city of Tallahassee, Florida provided safe drinking water by pumping water from the aquifer, adding chlorine and supplying it to the system, but no longer. As of April 1990, seven city wells are contaminated as well as an unknown number of private wells. As of last report, the city had tested 90 private wells and found 19 of them contaminated.

What types of businesses are responsible for the contamination? Drycleaners, auto repair, and ??

The chemicals? Trichloroethylene, called TCE and Tetrachlorethylene or PCE. PCE is one of the few chemicals that can seep through red clay.

TCE was a common chemical used for drycleaning, degreasing parts during manufacturing, and cleaning auto parts. PCE is in drycleaning fluids as well as solvents used to remove grease from parts and machinery. Since there were no controls until 1980, the disposal of these chemicals, the problem will only become more widespread. Pesticides used in nursery, and agriculture endeavors will cause similar contamination.

Tallahassee's first contaminated well was found in 1988. Among the suspected sources are an old dryclean-

ing business, about a half mile from the well, that operated in the 1960's (Yes, more than 20 years ago) and an old gas station about three quarters of a mile away. As for the area having private well contamination, there could have been a drycleaners in the area years ago or an auto repair shop could have thrown the used solvents on the ground. Also, a railroad passes through the area and a tank could have leaked. Maybe the source(s) will never be determined.

Today, it's PCE. Is the next a question of which other chemical will become a problem.

Contamination of Agricultural Properties *Potential Contamination Problems*

- Fuel tanks and dispensing areas (hydrocarbons)
- Pesticide storage and mixing areas (pesticides)
- Maintenance areas (waste oil, metals, solvents)
- Landfills (pesticides, heavy metals)
- Cattle excrement storage (nitrates)
- Produce washing areas (pesticides)
- Bulb rinsing areas (heavy metals)
- Waste oil storage and disposal (hydrocarbons)
- Historic wood treating facilities (creosote)
- Historic turpentine stills (volatile organics)
- Cattle dipping vats (hydrocarbons, pesticides)

**Performing Environmental Site
Assessments on
Agricultural Related Properties**

Performing Environmental Site Assessments on Agricultural Related Properties

First of all, lets realize that conducting a Phase I Environmental Site Assessment (ESA) on agricultural type properties is no more difficult than commercial properties. As per the ATSM Standard Practices, a preparer of an ESA is: 1) to make "all appropriate inquiries" into the present and past ownership and uses of the property being assessed, plus all adjoining properties and 2) to observe for all obvious, suspect and/or likelihood recognized environmental conditions.

Paraphrasing paragraphs of both of the ASTM Standard Practices:

SCOPE

Purpose: The purpose of an agricultural related ESA is to define good customary practice for conducting an ESA of a parcel of agricultural related real estate with respect to the range of contaminant's within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products. As such, this procedure is intended to permit a user (i.e. the party seeking to have an ESA conducted) to satisfy one of the requirements to qualify for the "innocent landowner defense" to CERCLA liability: that is, the practices that constitute "all appropriate inquiry into previous ownership and uses of the property consistent with good customary practice'.

Recognized Environmental Conditions: In defining a procedure of good commercial and customary practice for conducting an environmental site assessment of a parcel of property, the goal of the processes established by this procedure is to identify recognized environmental conditions. The term "recognized environmental conditions!" means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public 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.

Objectives: Objectives guiding the development of this procedure are: 1) to synthesize and put in writing good customary practice for ESA's, 2) to facilitate high quality, standardized ESA's, 3) to ensure that the standard of appropriate inquiry is practical and reasonable and 4) to clarify an industry standard for "appropriate inquiry" in an effort to guide interpretation of CERCLA's "innocent landowner defense".

If an ESA's subject property has many environmental concerns or is large in area, it may be advisable to subdivide the property into smaller parts (but not necessarily equal parts) in order to fully assist in describing what exists and where located. When sub-divided a drawing or map, showing and labeling each division, should be included in the ESA's report.

The following deals with the inspection and investigation (I/I) of agricultural related facilities:

The I/I of agricultural facilities can require a large increase in the total amount of time required to conduct all of the appropriate inquiries to permit a user to satisfy one of the requirements to qualify for the innocent landowner defense of CERLA liability. Therefore, there can be no time or cost constraints, on an agricultural facility, including many adjoining properties, for conducting a non-intrusive ESA on such properties.

When conducting a non-intrusive, agricultural related ESA, the preparer must, in addition to present day agricultural procedures and operations, investigate as to what and how potentially contaminating products were used in the past, perhaps even decades ago.

Pesticide contamination can be the result of

- improper or careless storage, mixing, application and/or the rinse water from equipment cleaning,
- the waste water discharge from the produce washing areas,
- the animal dipping vats (Also see the petroleum products section.)
- disposal of containers, waste water, excess pesticide solutions onto the ground or into pits, ponds, lagoons, dumps and landfills.
- poultry production that extensively uses pesticides to control external parasites (such as fleas, ticks, mites, and lice). The applications might be applied directly to the poultry or throughout all areas and structures where the poultry are raised.

OTHER RECOGNIZED ENVIRONMENTAL CONCERNS

Heavy metals

Heavy metals (not hard rock music but certain metals having a high atomic weight, such as cadmium, chromium, lead, mercury, silver and zinc) can result in high toxicity that can persist for a long time.

Ornamental flower crops, such as gladioli, were and are treated with compounds containing lead. The rinsing of the bulbs before "going to market" can result in heavy metals in the rinse water.

In addition to being found in dumps and landfills, heavy metal contaminated soil can be found where used motor oil was disposed of. Also, at the water irrigation pivot point on an agricultural facility, it is common to find that the: 1) used motor oil was disposed of onto the ground and 2) the tank for the fuel for operating the engine, which generates the electricity for moving the pivot and pumping the water, is a source of contamination, mainly due to the carelessness when filling the tank.

Turpentine Manufacturing

In specific areas, turpentine stills in their distillation procedure produced a waste product called "still dross" that was disposed of onto the ground. The disposal area inhibited plant growth for decades. However, the volatile organics that were in the "still dross" decay with time but some sites still could be contaminated.

Wood Treating Operations

Agricultural operations and the railroads treated fence posts and railroad ties by constructing a pit into which creosote was placed. The posts and ties were placed into the pit and left to soak up the creosote. (Electric companies used the same procedure to creosote light poles and these pits were larger in size.) The creosote contaminated pits can still be found today.

Inspections of agriculture sites requires a detailed present-day review of the site as well as the historical uses and operations of the site and adjoining properties. The size of some agricultural facilities is so large that the

required "walk" of the site could take days, if not weeks. There might be cases when the site inspections could demand an inspection by helicopter, especially if the site consists of many wooded areas or open fields and/or is in a remote location.

Of great importance is the fact that a large number of the most toxic and hazardous substance contaminated sites are related to the historical use of chemicals on agricultural properties. Also, many of the past uses of toxic or hazardous substances were not directly/actually related to farming or the production activities and the normal agricultural operations result in great quantities of solid waste. As a means of solid waste disposal many farms had unregulated dumps/landfills. These disposal dumps, pits and ponds were commonly used for the disposal of waste oil, pesticide containers and solvents that were used to degrease engine parts. Once again, the dumps/landfills on agricultural type properties might contain potentially significant environmental contamination, that would be considered as a recognized environmental condition.

The use of agricultural chemicals prior to 1940 was somewhat limited, but some of them, that were perhaps used improperly, could have left significant contamination conditions. Many of the "updated" agricultural chemicals were also persistent in the environment but the number and toxicity of them increased substantially. Some of them were banned but their residual toxicity can still be found.

PETROLEUM PRODUCTS (HYDORCARBONS) AND SOLVENTS

Contamination from petroleum products and solvents on an agricultural related facility can be found at:

- UST/AST locations and at their dispensing areas,
- vehicle maintenance areas, including any used motor oil disposal site,
- animal dipping vats, i.e. a hole in the ground, that were mandated by the US Department of Agriculture for the control of chronic disease problems associated with insect pests on cattle, horses, and other livestock raising operations. The vats were filled with kerosene to diesel and later pesticides such as DDT. Some of the vats were operated by a private owner but many were operated by the US Department of Agriculture on private lands. (Also see the pesticides section.),
- the pivot point of a pivot water irrigation system. (Also see the heavy metals section.)

PESTICIDES

For this recognized environmental condition the use of the word pesticide will include herbicides, insecticides, fungicides, rodenticides, etc.

The historic use of mixing areas can contain significant quantities of contamination, even after many years, that do not break down into harmless compounds (i.e. are not biodegradable). In fact some of the residues, that remain after the decomposition of the original compounds, are more toxic than the original compound. Since the use of pesticides may have occurred over long periods of time, the impact to the ground water or to the drinking water specifically, is an important concern.

Section II

**Environmental Due Diligence
Site Assessment
For Use With Any
Type of Property**

A NON-INTRUSIVE ALL INCLUSIVE ENVIRONMENTAL DUE DILIGENCE SITE ASSESSMENT

OBJECTIVE

The purpose of an Environmental Due Diligence Site Assessment (EDDSA) based on this guide is to identify recognized environmental conditions, to the extent feasible, in accordance with the processes described herein. Although a common purpose of an EDDSA is to satisfy one of the requirements to qualify for the innocent purchaser defense, it may be used for a number of reasons, such as a management tool. The industry standards for commercial real estate are the two by ASTM (formerly the American Society for Testing and Materials). ASTM is a respected industry organization that sets standards for many products, materials, systems and services. The main difference between these two ASTM environmental site assessment standards is the amount of appropriate inquiry that needs to be conducted.

The innocent purchaser defense legislation did not set standards to be followed in order to comply with the act, but indicated that an industry standard should be created. The ASTM environmental site assessment standards are an attempt to comply with this law as does this guide.

This guide, including the expandable questionnaires, allows the preparer to conduct all appropriate inquiry for the user, be it a Screen or a Phase I equivalent, without having to resort to other guidelines, documents or questionnaires. Also, this guide includes environmental issues of radon, lead in paint, lead in drinking water, asbestos, wetlands, endangered species, stormwater runoff and other regulatory concerns.

This guide, along with the questionnaires, has been designed so that the user/purchaser can satisfy one of the requirements to qualify for CERCLA's "innocent purchaser defense." It is absolutely necessary that the user be involved in all of the aspects of conducting the "all appropriate inquiry." It is the user who decides when further inquiry is desired. Hence, the user can decide at any time that further inquiry is NOT desired or that further inquiry is desired. Again, it is the user that makes these decisions!

There is a provision on the back page of each questionnaire (i.e. residential, non-residential structure, etc.) for the user to indicate that there's (i.e. for intent of the transaction) a need for further inquiry or that there's no need to proceed with further inquiry. The user's signature is required for each of the appropriate questionnaires as well as on the report's cover page in order that the user/purchaser can indicate the user's total concurrence.

The expandable questionnaire, which is non-bound (i.e. loose pages) and is a part of this guide, has been designed so that the preparer or user may employ those sections, and as many times as needed, that apply to a specific site. Each section of the questionnaire is complete in itself and, for example, the section on adjoining properties can be included as many times as necessary. When the subject site is large, there could be many different uses on the adjoining properties. The preparer or user would complete an "adjoining property section" for each of the adjoining properties.

This guide addresses the CERCLA requirements in order to satisfy one of the requirements to qualify for CERCLA's innocent purchaser defense in self-contained sections, plus other sections for agricultural concerns that might need to be addressed in order for the assessment to conform to the "all appropriate inquiry" requirements, such as disposal practices and the proper use and storage of pesticides.

Any actual knowledge that environmental contamination exists or that there is suspect environmental contamination on an agricultural parcel of land or in a structure on the land does not necessarily require that sampling

be conducted. Even if the contamination is considered to be a hazardous substance, the degree of contamination could be so insignificant that it does not present a material risk to human health or the environment. Such a condition-would not warrant further inquiry.

In some cases, information obtained during the non-intrusive investigations may require additional non-intrusive investigation in order to satisfy the "all appropriate inquiry" requirement.

QUESTIONNAIRE, SECTIONS SA THRU SF

Section SA: This section is for a residential structure and contents only. The preparer or user is to complete a copy of this Section for each attached or detached residential unit (i.e. for each house, duplex, apartment or mobile home) on the subject property. The preparer or user is to use a Section C questionnaire for all land-use(s) inquiries.

Note: The back side of each Section has an area for: comments, signature, etc. for the preparer, reviewer, or supervisor and user; and an option to indicate if it is felt that further inquiry is needed or not needed.

Section SB: The Section is for non-residential structures and contents only. The preparer or user is to complete a copy of this Section for each non-residential structure, even if attached to a residential unit or consists of a roof only, on the subject property. The preparer or user is to use a Section C questionnaire for all land-use(s) inquiries.

Section SC: This Section is for land issues and uses, on the subject property, only. All areas, present and past uses, should be identified by completing a copy of this Section for each individual area and the preparer or user is to complete a copy for each area.

If the subject property has many environmental concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what exists and where located. When sub-divided, a drawing or map, showing and labeling each division, shall be included in the appendices.

Section SD: This Section is for adjoining properties. The preparer or user is to complete a copy of this Section for each adjoining property.

Section SE: This Section is for the preparer or user for conducting inquiry into government records and historical sources for the subject site.

Section SF: This Section is for the preparer or user to use for other inquiries that are significant on the subject site.

A Non-Intrusive All Inclusive

**ENVIRONMENTAL DUE DILIGENCE
SITE ASSESSMENT**

A Screen Process that Expands
into a Phase I Equivalent

On

For

Date of Last Site Inspection _____ Report Issue Date _____

Signature of Preparer: _____ Date _____

Address: _____

Phone No.: _____

Signature of User: _____ Date _____

Address: _____

Phone No.: _____

Project No.

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Site Description

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Section C.	Land Issues and Site Visit	SC <u>1</u> of _____
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Section F.	Other Inquiries	SF <u>1</u> of _____

Optional Appendices

Copy of Contract

Legal Maps, Photos

Regulatory Documentation

Interview Documentation

Preparer's Qualifications

Questionnaire - Residential Structure(s) - Section A (SA)

This section is for a residential structure and contents only. Complete a copy of this Section for each attached or detached residential unit (ie for each house, duplex, apartment or mobile home) on the subject property. Use Section C for all land inquiries.

Description of unit _____

Year(s) of construction and major remodeling _____

Has the structure ever been used for anything other than residential? _____

If yes, for what purpose? _____

CERCLA Based Concerns

- o Are there toxic materials, including pesticides or herbicides, stored in the structure indicating more than household use? _____

Non-CERCLA Concerns

- o Is there any obviously suspect, friable, exposed asbestos? _____
- o Does the EPA Map of Radon Zones for the county in which the subject property is located indicate a predicted annual average radon level greater than 4 pci/L? _____
- o Has the subject structure been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? _____
- o Has the radon level in a structure in the general location of the subject property been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? _____

For the source of drinking water:

- o Is the subject structure served by a private well _____, a non-public water system _____, or a public water system _____?
- o If served by a private well or non-public water system, has the drinking water source been tested for contaminants, other than bacteria, and found to exceed the criteria of the appropriate regulatory agency? _____ List all contaminants that exceed their criteria in the comments for this structure in this section.
- o Regardless of the source of the drinking water, has a water sample, taken from inside the structure, been determined to contain lead in excess of 10 ug/L? _____

ANSWER CODE: Y for yes, N for no, U for unknown, NA for not appropriate

Page SA _____ of _____

Comments:

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

REVIEWER: I feel that there is need, no need for further inquiry into this section of this environmental assessment.
SUPERVISOR

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

USER: The user feels that there is need, no need for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

Questionnaire - Non-Residential Structure(s) - Section B (SB)

This section is for non-residential structure and contents only. Complete a copy of this Section for each non-residential structure on the subject property, even if it is attached to a residential structure or consists of only a roof.

Use Section C for all land inquiries.

Size, Age, Description, Location and Purpose of this structure: _____

Present and past uses of this structure: _____

CERCLA Based Concerns

o Are there any observed electrical or hydraulic equipment with labels indicating PCB's in the structure? _____

o Are there any stained/discolored floors or walls in the structure? _____
If yes, explain in the comments section for this structure.

o Are there any suspected hazardous substances stored in this structure? _____
If yes, list all suspected substances, the estimated amounts and the type of container for each:

(If needed continue in Comments on other side.)

Answer Code: Y for yes, N for no, U for unknown, and NA for not applicable

Page SB ____ of ____

Questionnaire - Land Issues and Uses Section C (SC)

This section is for land issues and uses, on the subject property, only. All areas, present and past uses, as listed here (as well as others not mentioned) should be identified by completing a copy of this section for each individual environmental concern: UST's; AST's; disposal areas including septic tanks, ponds, pit and lagoons that are or were used for disposal; storage areas, mixing areas, maintenance areas.

If the subject property has many of these concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what is found and where located. When sub-divided, a drawing or map, showing and labeling each subdivision, shall be included in the appendices.

CERCLA Based Concerns:

- o Are there any: UST's _____ ; AST's _____ ; Disposal Areas _____ ; Septic Tanks _____ ; Ponds, Pits or Lagoons that are or ever were used for disposal _____ ; Storage Areas _____ ; Mixing Areas _____ ; Maintenance Areas _____ ; Landfills or Dumps _____ ; Stained or Discolored Soil _____ ; Areas lacking Vegetation and/or having Stressed Vegetation _____ ; Fill Dirt _____ ; Suspicious Mounds or Recesses _____ ; Are there any Transformers or Hydraulic Equipment that might indicate PCB's _____ ?
- o For yes answer(s):
- o Is the area within 100 feet of a drinking water well? _____
Which area(s)?
- o Describe the area(s) in the comments portion of this section.
- o Has the subject property ever been used for dry cleaning,, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling or injection well(s)? _____ If yes, describe in comments portion.
- o Does surface or stormwater flow on to the subject property? _____
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate.

Page SC _____ of _____

Comments:

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or section of this environmental assessment.

SUPERVISOR

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

USER: The user feels that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? _____
If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? _____
If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property.
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? _____
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD ____ of ____

Comments:

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or section of this environmental assessment.

SUPERVISOR

_____	_____	_____
printed name	signature	date

address		

_____	_____	
phone number	fax number	

USER: The user feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	
phone number	fax number	

Questionnaire - Records Review Section E (SE)

GOVERNMENT RECORDS/HISTORICAL SOURCES INQUIRY

Do any of the following Federal government record systems list the Property or any property within the circumference of the area noted below:

- | | | |
|---|-----|----|
| National Priorities List -- within 1.0 mile/1.6 Km? | Yes | No |
| CERCLIS List -- within .5 mile/.8 Km? | Yes | No |
| RCRA TSD Facilities -- within 1.0 mile/1.6Km? | Yes | No |

Do any of the following State record systems list the property or any property within the circumference of the area noted below:

List maintained by State Environmental Agency of hazardous waste sites identified for investigation or remediation that is the State agency equivalent of NPL -- within approximately 1.0 mile/1.6 Km?

	Yes	No
--	-----	----

List maintained by State Environmental Agency of sites identified for investigation or remediation that is the state equivalent to CERCLIS -- within .5 mile/.8 Km?

	Yes	No
--	-----	----

Leaking Underground Storage Tank (LUST) List -- within .5 mile/.8 Km?

	Yes	No
--	-----	----

Solid Waste/Landfill Facilities -- within .5 mile/.8 Km?

	Yes	No
--	-----	----

Comments:

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or section of this environmental assessment.

SUPERVISOR

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

USER: The user feels that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

Questionnaire - Other Inquiries - Section F (SF)

Comments:

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or section of this environmental assessment.

SUPERVISOR:

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

USER: The user feels that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	_____
phone number	fax number	

Section III

Case Study

*160 acres, that for study
purposes, have been
sub-divided into sixteen
10 acre subsites.*

*There are
four adjoining properties*

CASE STUDY

For this case study, the 160 acre subject property has been subdivided into sixteen 10 acre sub-sites, that are labelled SSa thru SSp. The subject property is served by the Rural Electric Co-op.

On SSa there is a 1957 brick residential structure that has never been repainted and a 1988 mobile home that are occupied. Except for possible lead paint in the brick home, there are no obvious recognized environmental conditions. A drinking water well and one septic tank serve both of the residences. The drinking water well is less than forty feet from the septic tank, a UST and an AST.

SSb and SSc are used for growing fruit trees and vegetables for consumption by the residents.

Until about 1978 there was an uncrolled dump on SSd, that was used by the public, which was covered with contaminated soil in 1978. This area can not be used for farming since nothing will grow on it.

On SSe there is an auto and farm machinery parking area and a vehicle storage area. There is a roof-only, multi-use storage area and a vehicle maintenance structure. The area below the roof is sometimes used for the washing of produce before shipping. The rinse water flows onto the sandy ground. Used motor oil is poured onto the ground in the SW area of SSe.

On SSp there is a one acre pit that contains water. Trash, garbage and used pesticide containers were among the items that were disposed of into this pit until last year. Until 1991 the NW area of SSp was used as a pesticide mixing area. Also on SSSp there is a roof only storage structure for pesticides, fertilizers and other farm related products that are used in the farming operations. There are many 55 gallon drums around the area.

On adjoining properties and within 1/8 of a mile to the subject property:

- Until last year there was a large chemical and pesticide manufacturing facility on adjoining property #1.
- On the north portions of:
 - adjoining property #2 there is a large on-site dry cleaning facility.
 - adjoining property #4 there is a farm tractor sales, maintenance and tractor repair facility that employs 50 people.
- The southern half of adjoining properties #2 and #4 are sometimes leased for commercial farming operations.
- Adjoining property #3 is used commercially as a fruit tree orchard. This operation uses fertilizers and chemicals to control both above and below ground insects.

CASE STUDY
On An Agricultural Property

Adjoining Property #1

OLD DIRT ROAD

Subject Site
 160 Total
 Acres

Adjoining
 Property #4

SSa	SSb	SSc	SSd
SSE	SSf	SSg	SSh
SSi	SSj	SSk	SSl
SSm	SSn	SSo	SSp

Adjoining
 Property #2

Adjoining Property #3

A Non-Intrusive All Inclusive

**ENVIRONMENTAL DUE DILIGENCE
SITE ASSESSMENT**

For an Agricultural Facility

**A Screen Process that Expands
into a Phase I Equivalent**

**On
160+/- Acres**

On

OLD DIRT ROAD

For

**FARMERS FIRST BANK
Anytown, USA 99999**

Date of Last Site Inspection 8/08/94 Report Issued Date 8/09/94

Signature of Preparer: _____ Date 8/04/94

Address: _____

Phone: _____

Signature of User: _____ Date 8/10/94

Address: _____

Phone: _____

Table of Contents

Summary

Introduction PAGE 1

Site Description

Questionnaire		SA1 - SE2
Section A. Residential Structures		SA1 - SA4
Section B. Non-Residential Structures		SB1 - SB4
Section C. Land Issues and Site Visit		SC1 - SC8
Section D. Adjoining Properties		SD1 - SD8
Section E. Records Inquiry		SE1 - SE2
Section F. Other Inquiries		SF NA

Optional Appendices

Copy of Contract

Legal Maps, Photos

Regulatory Documentation **Not Included**

Interview Documentation

Preparer's Qualifications

SUMMARY

The intent of this non-intrusive environmental site assessment was for the determination of recognized environmental conditions, readily apparent or suspected, on a 160 acre agricultural site on Old Dirt Road, Anytown, USA. This “all appropriate inquiry” assessment was conducted on August 2 thru August 8, 1994 on the authorization of the owner, Mr. I. Ownit.

The “need or no need” for further inquiry, based on the opinion of the preparer, is stated, along with the preparer’s signature, in the allocated part of each appropriate questionnaire.

INTRODUCTION

The purpose of this non-intrusive assessment report is to document the fact finding efforts that were used to determine the potential recognized environmental conditions related to the subject property and the adjoining properties. It is not necessarily intended or designed to fully comply with all applicable Federal and/or State environmental statutes, but rather is limited to the specific matters stated herein that make up the different questionnaires.

SITE DESCRIPTION

The 160 acre subject site is on Old Dirt Road, Anytown, USA, about 3 miles east of state road #69. In order to facilitate the identification of the different findings on the 160 acres, the subject site has been sub-divided into sixteen ten acre sub-sites that have been labeled SSa thru SSp.

Questionnaire - Residential Structures - Section A (SA)

This section is for a residential structure and contents only. Complete a copy of this Section for each attached or detached residential unit (ie for each house, duplex, apartment or mobile home) on the subject property. Use Section C for all land inquiries.

Description of unit Brick Home (in SSa sub-section)

Year(s) of construction and major remodeling 1957

Has the structure ever been used for anything other than residential? N

If yes, for what purpose? _____

CERCLA Based Concerns

- o Are there toxic materials, including pesticides or herbicides, stored in the structure indicating more than household use? N

Non-CERCLA Concerns

- o Is there any obviously suspect, friable, exposed asbestos? N
- o Does the EPA Map of Radon Zones for the county in which the subject property is located indicate a predicted annual average radon level greater than 4 pci/L? N
- o Has the subject structure been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? U
- o Has the radon level in a structure in the general location of the subject property been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? U

For the source of drinking water:

- o Is the subject structure served by a private well Y, a non-public water system N, or a public water system N?
- o If served by a private well or non-public water system, has the drinking water source been tested for contaminants, other than bacteria, and found to exceed the criteria of the appropriate regulatory agency? N List all contaminants that exceed their criteria in the comments for this structure in this section.
- o Regardless of the source of the drinking water, has a water sample, taken from inside the structure, been determined to contain lead in excess of 10 ug/L? U

ANSWER CODE: Y for yes, N for no, U for unknown, NA for not appropriate

Page SA 1 of 4

Comments:

None

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date
123 Main Street, Anytown, USA		
address		
_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or
SUPERVISOR section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER: The user feels that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		
_____	_____	
phone number	fax number	

Questionnaire - Residential Structures - Section A (SA)

This section is for a residential structure and contents only. Complete a copy of this Section for each attached or detached residential unit (ie for each house, duplex, apartment or mobile home) on the subject property. Use Section C for all land inquiries.

Description of unit Mobile Home (in SSa sub-section)

Year(s) of construction and major remodeling 1988

Has the structure ever been used for anything other than residential? N

If yes, for what purpose? _____

CERCLA Based Concerns

- o Are there toxic materials, including pesticides or herbicides, stored in the structure indicating more than household use? N

Non-CERCLA Concerns

- o Is there any obviously suspect, friable, exposed asbestos? N
- o Does the EPA Map of Radon Zones for the county in which the subject property is located indicate a predicted annual average radon level greater than 4 pci/L? N
- o Has the subject structure been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? U
- o Has the radon level in a structure in the general location of the subject property been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? U

For the source of drinking water:

- o Is the subject structure served by a private well Y, a non-public water system N, or a public water system N?
- o If served by a private well or non-public water system, has the drinking water source been tested for contaminants, other than bacteria, and found to exceed the criteria of the appropriate regulatory agency? N List all contaminants that exceed their criteria in the comments for this structure in this section.
- o Regardless of the source of the drinking water, has a water sample, taken from inside the structure, been determined to contain lead in excess of 10 ug/L? U

ANSWER CODE: Y for yes, N for no, U for unknown, NA for not appropriate

Page SA 3 of 4

Comments:

None

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		

_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or
SUPERVISOR section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	
phone number	fax number	

USER: The user feels that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		

_____	_____	
phone number	fax number	

Questionnaire - Non-Residential Structure(s) - Section B (SB)

This section is for non-residential structure and contents only. Complete a copy of this Section for each non-residential structure on the subject property, even if it is attached to a residential structure or consists of only a roof.

Use Section C for all land inquiries. This questionnaire is for the front structure.

Size, Age, Description, Location and Purpose of this structure: _____

Roof only. Structure for general use. (in sub-site SSe)

20' X 40', age unknown

Present and past uses of this structure: _____

Multi-use: storage area and vehicle maintenance.

Sometimes used for the washing of produce.

CERCLA Based Concerns

- o Are there any observed electrical or hydraulic equipment with labels indicating PCB's in the structure? N
- o Are there any stained/discolored floors or walls in the structure? N
If yes, explain in the comments section for this structure.
- o Are there any suspected hazardous substances stored in this structure? Y
If yes, list all suspected substances, the estimated amounts and the type of container for each:

Suspected/known substances: fertilizers, pesticides in various sized containers.

Estimated amounts: total amount in excess of 100 gallons or equivalent.

Types of containers: varies

Other recognized environmental condition: the rinse water from the produce washing flows onto the sandy ground.

(If needed continue in Comments on other side.)

Answer Code: Y for yes, N for no, U for unknown, and NA for not applicable

Page SB 1 of 4

Comments:

None

If more space is needed use the Additional Comments page.

PREPARER:

The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER:

I feel that there is need, no need for further inquiry into this section of this environmental assessment.

or SUPERVISOR

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER:

The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		
_____	_____	
phone number	fax number	



Comments:

This area, especially under the structure, is very messy.

Empty containers are randomly disposed of.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>8/09/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or
SUPERVISOR section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>8/09/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

Questionnaire - Land Issues and Uses Section C (SC)

This section is for land issues and uses, on the subject property, only. All areas, present and past uses, as listed here (as well as others not mentioned) should be identified by completing a copy of this section for each individual environmental concern: UST's; AST's; disposal areas including septic tanks, ponds, pit and lagoons that are or were used for disposal; storage areas, mixing areas, maintenance areas.

If the subject property has many of these concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what is found and where located. When sub-divided, a drawing or map, showing and labeling each subdivision, shall be included in the appendices.

CERCLA Based Concerns: In sub-site SSa

- o Are there any: UST's Y ; AST's Y ; Disposal Areas N ; Septic Tanks Y ; Ponds, Pits or Lagoons that are or ever were used for disposal N ; Storage Areas N ; Mixing Areas N ; Maintenance Areas N ; Landfills or Dumps N ; Stained or Discolored Soil N ; Areas lacking Vegetation and/or having Stressed Vegetation N ; Fill Dirt N ; Suspicious Mounds or Recesses N ; Are there any Transformers or Hydraulic Equipment that might indicate PCB's N ?
- o For yes answer(s):
- o Is the area within 100 feet of a drinking water well? Y
Which area(s)? Septic tank, UST's, AST's.
- o Describe the area(s) in the comments portion of this section.
- o Has the subject property ever been used for dry cleaning,, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling or injection well(s)? N If yes, describe in comments portion.
- o Does surface or stormwater flow on to the subject property? N
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate.

Page SC 1 of 8

Comments:

The septic tank is located within forty feet of the drinking water well.

The UST and AST are located within eighty feet of the drinking water well.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or
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_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		
_____	_____	
phone number	same fax number	

Questionnaire - Land Issues and Uses Section C (SC)

This section is for land issues and uses, on the subject property, only. All areas, present and past uses, as listed here (as well as others not mentioned) should be identified by completing a copy of this section for each individual environmental concern: UST's; AST's; disposal areas including septic tanks, ponds, pit and lagoons that are or were used for disposal; storage areas, mixing areas, maintenance areas.

If the subject property has many of these concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what is found and where located. When sub-divided, a drawing or map, showing and labeling each subdivision, shall be included in the appendices.

CERCLA Based Concerns: In sub-site SSd

- o Are there any: UST's N ; AST's N ; Disposal Areas N ; Septic Tanks N ; Ponds, Pits or Lagoons that are or ever were used for disposal N ; Storage Areas N ; Mixing Areas N ; Maintenance Areas N ; Landfills or Dumps Y ; Stained or Discolored Soil N ; Areas lacking Vegetation and/or having Stressed Vegetation Y ; Fill Dirt Y ; Suspicious Mounds or Recesses N ; Are there any Transformers or Hydraulic Equipment that might indicate PCB's N ?
- o For yes answer(s):
- o Is the area within 100 feet of a drinking water well? N
Which area(s)?
- o Describe the area(s) in the comments portion of this section.
- o Has the subject property ever been used for dry cleaning,, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling or injection well(s)? N If yes, describe in comments portion.
- o Does surface or stormwater flow on to the subject property? N
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate.

Comments:

Until about 1978 there was an uncontrolled dump on this sub-site (SSd) that was used by the public.

The dump was covered with suspected contaminated soil in 1978.

The area, where the dump was, cannot be used for farming since nothing will grow on it.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature 8/09/94 date
_____ address
_____ phone number _____ fax number

REVIEWER: I feel that there is need, no need for further inquiry into this or section of this environmental assessment.
SUPERVISOR

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature 8/09/94 date
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_____ phone number _____ fax number

Questionnaire - Land Issues and Uses Section C (SC)

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CERCLA Based Concerns: In sub-site SSe

- o Are there any: UST's N ; AST's N ; Disposal Areas Y ; Septic Tanks N ; Ponds, Pits or Lagoons that are or ever were used for disposal N ; Storage Areas N ; Mixing Areas N ; Maintenance Areas N ; Landfills or Dumps N ; Stained or Discolored Soil Y ; Areas lacking Vegetation and/or having Stressed Vegetation Y ; Fill Dirt N ; Suspicious Mounds or Recesses N ; Are there any Transformers or Hydraulic Equipment that might indicate PCB's N ?
- o For yes answer(s):
- o Is the area within 100 feet of a drinking water well? N
Which area(s)? _____
- o Describe the area(s) in the comments portion of this section.
- o Has the subject property ever been used for dry cleaning,, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling or injection well(s)? N If yes, describe in comments portion.
- o Does surface or stormwater flow on to the subject property? N
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate.

Comments:

In the southwest area of sub-site SSe, used motor oil has always been poured onto the ground.

The used motor oil disposal area, which covers about forty square feet, is discolored, saturated with used oil and lacks vegetation.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ 8/09/94
printed name signature date

address
_____ ~~-----~~
phone number fax number

REVIEWER: I feel that there is need, no need for further inquiry into this or
SUPERVISOR section of this environmental assessment.

_____ date
printed name signature

address
_____ ~~-----~~
phone number fax number

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ 8/09/94
printed name signature date

address
_____ ~~-----~~
phone number fax number

Questionnaire - Land Issues and Uses Section C (SC)

This section is for land issues and uses, on the subject property, only. All areas, present and past uses, as listed here (as well as others not mentioned) should be identified by completing a copy of this section for each individual environmental concern: UST's; AST's; disposal areas including septic tanks, ponds, pit and lagoons that are or were used for disposal; storage areas, mixing areas, maintenance areas.

If the subject property has many of these concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what is found and where located. When sub-divided, a drawing or map, showing and labeling each subdivision, shall be included in the appendices.

CERCLA Based Concerns: In sub-site SSp

- o Are there any: UST's N ; AST's N ; Disposal Areas Y ; Septic Tanks N ; Ponds, Pits or Lagoons that are or ever were used for disposal Y ; Storage Areas Y ; Mixing Areas Y ; Maintenance Areas N ; Landfills or Dumps N ; Stained or Discolored Soil Y ; Areas lacking Vegetation and/or having Stressed Vegetation Y ; Fill Dirt N ; Suspicious Mounds or Recesses N ; Are there any Transformers or Hydraulic Equipment that might indicate PCB's N ?
- o For yes answer(s):
- o Is the area within 100 feet of a drinking water well? N
Which area(s)? _____
- o Describe the area(s) in the comments portion of this section.
- o Has the subject property ever been used for dry cleaning,, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling or injection well(s)? N If yes, describe in comments portion.
- o Does surface or stormwater flow on to the subject property? N
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate.

Comments:

On SSp, sub-site: There is one acre, water filled pit, that was used until last year for the disposal of trash, garbage and empty fertilizer pesticide, etc. containers. There are an estimated seventy 55 gallon drums in this sub-site, some empty, others partially filled. On the northwest area (about one hundred square feet) of this sub-site is a stained soil, no vegetation area that until 1991 was used for pesticide mixing.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ 8/09/94
printed name signature date

address

phone number fax number

REVIEWER: I feel that there is need, no need for further inquiry into this section of this environmental assessment.
SUPERVISOR

printed name signature date

address

phone number fax number

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ 10/07/94
printed name signature date

address

phone number same fax number

Questionnaire - Adjoining Properties - Section D (SD) #1

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

To the north of and across Old Dirt Road from the subject site:
until last year there was an estimated 100,000 square foot chemical
and pesticide manufacturing facility.

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? N
If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N
If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property. Y
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? Y
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 1 of 8

Questionnaire - Adjoining Properties - Section D (SD) #4

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

To the west and adjacent to the subject site, on the north portion
is a farm tractor sales, maintenance and repair facility. The
southern portion is sometimes leased for farming operations.

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? N
If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N
If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property. Y
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? Y
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 7 of 8

Comments: Adjoining Property #4

Due to the investigative time involved (so as not to delay this report), further investigations, after obtaining permission to be on the adjoining site and/or to inquire as to operations, etc., should be considered, by the user of this assessment, on this adjoining site: (1) into their disposal practices over time and (2) investigations into environmental law(s), permit(s), violation(s) to determine if any violation(s) might have environmentally effected the subject property.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature 8/09/94 date
_____ address
_____ phone number _____ fax number

REVIEWER: I feel that there is need, no need for further inquiry into this or section of this environmental assessment.
SUPERVISOR

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature 8/09/94 date
_____ address
_____ phone number _____ same fax number

Questionnaire

Section E (SE)

GOVERNMENT RECORDS/HISTORICAL SOURCES INQUIRY

Do any of the following Federal government record systems list the Property or any property within the circumference of the area noted below:

- National Priorities List -- within 1.0 mile/1.6 Km? Yes No
- CERCLIS List -- within .5 mile/.8 Km? Yes No
- RCRA TSD Facilities -- within 1.0 mile/1.6Km? Yes No

Do any of the following State record systems list the property or any property within the circumference of the area noted below:

List maintained by State Environmental Agency of hazardous waste sites identified for investigation or remediation that is the State agency equivalent of NPL -- within approximately 1.0 mile/1.6 Km?

Yes No

List maintained by State Environmental Agency of sites identified for investigation or remediation that is the state equivalent to CERCLIS - within .5 mile/.8 Km?

Yes No

Leaking Underground Storage Tank (LUST) List -- within .5 mile/.8 Km?

Yes No

Solid Waste/Landfill Facilities -- within .5 mile/.8 Km? Yes No

Comments:

None.

If more space is needed use the Additional Comments page.

PREPARER:

The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		

_____	_____	
phone number	fax number	

REVIEWER:
SUPERVISOR

I feel that there is need, no need for further inquiry into this or section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		

_____	_____	
phone number	fax number	

USER:

The user feels that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	8/09/94
printed name	signature	date

address		

_____	_____	
phone number	same fax number	

Section IV

Environmental Due Diligence Site Assessment for Agricultural Related Properties

- *Animal Raising*
 - *Farms*
- *Groves/Orchards*
 - *Vacant Land*

ENVIRONMENTAL DUE DILIGENCE SITE ASSESSMENT FOR AGRICULTURAL RELATED PROPERTIES

Chapter 1

- Purpose and Goals of Course
- History and Objectives of Environmental Site Assessments and ASTM

Chapter 2

- Introduction of ASTM-Standard Practices, Scope and Terminology
- Recognized Environmental Considerations
- Non-Scope Hazards Per ASTM Standards Practices

Chapter 3

- Other Environmental Considerations

Chapter 4

- Use of the ASTM Questionnaire

Chapter 5

- Use of Non-Intrusive Questionnaires as Used on Agricultural Related Environmental Site Assessments

Chapter 6

- Environmental Site Assessment Acts
- Government Records, Historical Sources, and Visual Observation

CHAPTER I INTRODUCTION PURPOSE AND GOALS

The purpose and goals of this Environmental Due Diligence Site Assessment (EDDSA) course on agricultural related properties is to:

- Provide the technical and practical knowledge necessary to conduct a non-intrusive environmental due diligence site assessment, including the use of questionnaires.
- Provide the insight into the relevant concerns that are appropriate when conducting an EDDSA inspection and associated investigations.
- Provide the necessary means for completing an EDDSA.
- Give the information about laws and legislation that have impacted the environmental site assessment industry.

HISTORY AND OBJECTIVES OF ENVIRONMENTAL SITE ASSESSMENTS AND ASTM

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and its Superfund Amendments and Reauthorization Act (SARA) created the necessity for conducting an environmental site assessment (ESA) on non-residential properties prior to the completion of a transaction. The Acts did not provide the means for: 1) conducting an ESA or 2) qualifying for the innocent landowner/purchaser defense to CERCLA liability. This resulted in ESA's being conducted without any uniform guidelines.

ASTM formed the ESO Environmental Committee that promulgated two Standard Practices:

- E1527 for Phase I Environmental Site Assessment and
- E1528 Transaction Screen Process

The purpose of these Standard Practices is to define good commercial and customary practice in the United States of America for conducting an ESA of a parcel of commercial real estate with respect to the range of contaminants within the scope of CERCLA and petroleum products. These practices are intended to permit a nonresidential real estate purchaser to satisfy one of the requirements to qualify for the innocent landowner/purchaser defense to CERCLA liability; ie. the practices that constitute all appropriate inquiry into the commercial or customary practice.

The innocent purchaser defense to CERCLA liability is available only if the purchaser also shows the following: (ie. in addition to having made "all appropriate inquiry" that showed that there was no visible environmental problems at the site, that the purchaser had no knowledge of environmental problems-at the site and that the purchase price did not reflect a reduction on account of environmental problems)

- The release or threat of release was caused solely by a third party.
- The third party is/was not an employee or agent of the person attempting to qualify for the innocent purchaser defense.

CHAPTER 2

(Include E1527 and E1528 ASTM Standards)

Refer to Practice Standards for:

- 1.1 Purpose and scope
 - 1.1.1 Recognized Environmental Conditions
- 3. Terminology (3.1 through 3.4.22)
- 11. Non-Scope Considerations

ASBESTOS

Asbestos is a mineral fiber found in rocks. There are several kinds of asbestos fibers, all of which are fire resistant and extremely durable. These qualities inside asbestos very useful in construction mid industry. Between approximately 1900 and 1972 asbestos was commonly used in many kinds of buildings. In the 1970s, However, (the use of asbestos was first restricted and was gradually phased out of use in building materials.

It was discovered that the inhalation of Airborne asbestos fibers can cause various types of cancer, as well as asbestosis (a serious degenerative lung disease). The danger posed by asbestos is through the breathing of asbestos fibers, which most often escape into the air when surfaces coated with "friable" asbestos begin to deteriorate (Asbestos is called "friable" if it crumbles easily when subjected to hand pressure.)

Although the dangers associated with the use of asbestos have been evident for quite some time, asbestos's superior fire resisting and insulating abilities practically dictated its use until very recently. Between 1900 and 1980, it has been estimated that more than 30 million tons of asbestos were used in the United States. Uses of asbestos that should be looked for are:

- hot water pipe covering, duct and boiler insulation in vinyl floor tiles, rolled linoleum and covace material
- siding on both residential and commercial buildings roofing shingles and felts spray-on
- insulation or paint on walls and ceilings, acoustical ceiling tiles, window putty
- fuse boxes heat reflectors, such as found on wood stoves, air duct lining
- light fixture insulation

By some estimates, 75 percent of residential properties which are more than 30 years old and are heated with steam or hot water, contain asbestos in some form. Location of the property has no bearing on the potential for asbestos. Although banned for over a decade, some asbestos containing building materials are still available.

There are three common types of materials that can contain friable asbestos that may signal the need for further inquiry. These are:

1. A fluffy, sprayed-on material used for fireproofing ceilings or walls or other structural features (sometimes it appears to look like cotton candy) or a sprayed or troweled-on material which resembles a granular, cement-like plaster and is usually for fire and sound proofing on walls and ceilings.
2. Non-friable asbestos wall board (that presents no threat unless it is broken) with sprayed or troweled-

on material behind, serving as insulation.

3. Asbestos-based pipe or boiler insulation which may appear as felt-like, cement-like or resemble a fibrous wrapping paper.

Remember, friable asbestos-containing material can easily be crumbled by hand pressure. If you suspect asbestos, or in fact have accidentally crumbled material that may be asbestos, take care not to breathe in the fibers or get them near your face. Keep away from any dust in a suspected area. If one has cause to believe that asbestos may be present, they should exercise due care to insure that the material is not disturbed (scraped, sanded, drilled through, etc.)

In large part due to federal legislation that required asbestos inspections to be undertaken for every school in the nation, most local county health officials are knowledgeable regarding asbestos identification and abatement procedures. Further, each Environmental Protection Agency (EPA) regional office has a Regional Asbestos Coordinator, who is knowledgeable in a technical sense, as well as being able to provide names of local laboratories and contractors to assist in testing for and removing asbestos. Speak with current owners, former owners, or neighbors to determine if they are aware of any asbestos now or previously on the property. Ask about special pipe covering, hot water unit covers, asbestos tile, asbestos siding or any other asbestos products. If improvements have been made to file property, the inspector should determine the age of these improvements. Asbestos Regulations were, first issued by OSHA in 1972 and in 1979 these regulations were made stricter. Buildings constructed prior to these dates have a much higher chance of having asbestos products in them.

There is some controversy as to whether it is better to leave asbestos in place and encapsulate it rather than to removed it, assuming tile asbestos is not friable. A 1991 report commissioned by Congress stated that tile actual health effects from asbestos affected so few people that it would be better to focus on other risks. The report further stated that tile removal process usually released more asbestos into the air than if it was left undisturbed, and that encapsulation would be a better alternative. This is not the end of the asbestos controversy, but at present the tendency seems to be to leave it alone if it is in good condition. However, asbestos still must be noted where suspected and/or present.

RADON

Exposure to indoor radon is one of the most serious environmental health problems facing the American public - second only to smoking as a cause of cancer. Radon is a radioactive, colorless, odorless, naturally occurring gas that seeps through the soil, rock and water and collects in homes.

More specifically, radon gas is produced when certain natural radioactive minerals break down or decay. These natural minerals are always present in the environment in slight amounts and are found in increased quantities in particular geologic deposits. Radon gas further decays into smaller particles known as radon "daughters" or progeny, which attach to soil or dust particles in the air. As these particles are limited, the daughter products can be deposited in the lining of the lung and subsequently decay or emit radioactive particles. This radioactive decay damages lung tissue and causes cellular changes which may transform normal cells into cancer cells.

Although there is no truly "safe" level of radon, the EPA recommends that home owners fix their homes if radon levels above 4.0 picocuries per liter (pCi/L) are found and confirmed. While radon is found in every state in the United States, the percentage of homes within each state with radon levels above 4.0 pCi/L, ranges from 71% to 1%. However, states with relatively low-risk areas may still have individual homes with high

radon levels. The only way to know is to test the home.

There are certain areas of the country where the incidence of Radon is very high. In the state of Pennsylvania, for example, of over 30,000 homes tested, 55% had levels of Radon considered potentially dangerous. There is no way to determine which homes or buildings might have high levels of Radon. Two adjacent structures can have completely different levels of radon, which is dependent on the structure of the subsurface rocks.

It is believed that entry of the gas occurs through slats, cracks and leaks, and through porous building materials and crawl spaces. The highest Radon readings are usually found in the lowest levels of a structure and decrease significantly on the first and second floors. Fortunately, curing a structure of Radon gas is relatively easy and inexpensive once the problem has been discovered. It is simply a process of sealing the cracks and crevices that allow the gas to leak in or creating a way to vent the gas out of the structure.

Indoor radon concentrations depend on many factors: the concentration of radon in the underlying soil, the ease with which the Radon can move through the soil, and several aspects of the house construction which determine both the ease with which the radon can enter the bottom of the home and the extent to which lowered pressure in the home actively draws the gas out of the ground. Testing for the maximum radon reading is done in the lowest potential living level of the building. Various sampling techniques are available through specialized contractors.

The EPA operates two voluntary proficiency programs - The Radon Measurement Proficiency (RMP) Program and the Radon Contractor Proficiency (RCP) Program - evaluate the proficiency of radon measurement and mitigation companies, respectively. Recently, EPA added a new component to the RMP designed to evaluate the proficiency of individuals offering on-site residential measurement services. If a person plans to hire a trained contractor or test or fix their home, the EPA recommends that he or she hire a qualified radon firm as determined by the RMP or RCP Programs.

The scientific principles and policies guiding the Radon Programs have been distilled into succinct "user friendly" publication for dissemination through radon public outreach programs. In 1992 and 1993, the EPA published three new policy documents, A Citizen's Guide to Radon, Home Buyer's and Seller's Guide to Radon, and the consumer's Guide to Radon Reduction.

EPA recognizes that it should not be the sole "source" for communicating about radon risks. Hence, EPA has established and expanded communications networks in which multiple, key organizations serve as sources of radon information. These organizations include the American Lung Association, National Association of Counties, Consumer Federation of America, Environmental Assessment Association, Environmental Law Institute, the National Medical Association, National Safety Council, National Children's Theater for the Environment, and many others. EPA, in conjunction with these national organizations, will focus efforts on:

- Implementing radon resistant new construction standards,
- Promoting testing before or during the real estate transaction,
- Identifying and targeting high risk areas and population (e.g. smokers), and,
- Ensuring equitable presentation of radon risk information to minority populations.

LEAD

Lead is a pliable, soft metal that is used for pipes, rods, and containers. Before 1978, lead was a coalition ingredient in paint because it added strength, shine and extended the life of the paint. In 1978 the United States

banned the use of lead pigments in paints used on interior and exterior residential surfaces.

Over the course of the past few years, the federal government has strengthened its regulation of lead products. Recognizing that lead can be extremely toxic, can impair physical and mental development of young children and can apparently lead to increases in high blood pressure in adults, the Environmental Protection Agency, the Department of Housing and Urban Development and the Consumer Product Safety Commission have moved to restrict people's exposure to lead.

The presence of old lead-based paint in Housing represents the most significant hazard remaining for lead poisoning, particularly for young children. The most common means of exposure is young children eating peeled and flaked pieces of paint, which is a significant problem in inner-city, lower-income areas where housing may be older and poorly maintained.

Lead poisoning can also result from children having access to surfaces that have perfectly intact lead-based paint covering that are chewable (e.g., door edging, window sills, banisters, etc.). It is estimated nearly a total of 30 to 40 million older homes around the country contain lead-based paint.

Recent studies have shown that, in addition to eating paint containing lead, the dust produced by normal oxidation of tile paint can contain significant amounts of lead. This dust can be easily ingested by children who touch it with their fingers and then put them in their mouths. Lead paint dust can also exist in high concentrations in soil near a home that had lead paint used on its exterior. If the paint was scraped or sand-blasted off, dust from the paint may have settled in the soil around the home and be picked up and ingested.

Ingestion of peeling or flaking paint remains a significant problem for any child where lead-based paint may be present. Many cities and towns have thus passed ordinances requiring certification before the sale/lease of the building.

There are presently only two ways in which lead-based paint may be tested. These are through laboratory analysis of paint chips and by portable X-ray fluorescence analyzers. Nationally, the number of laboratories and X-ray fluorescence analyzers, to test for lead's presence in paint currently is quite limited.

There are simple ways to determine if lead is present in paint, such as JW Lead Check devices, but these do not provide a reading of the amount of lead, only of its presence. These devices must not be represented as a "test", they merely indicate whether lead is present.

Interview owners, if possible, to determine if they are aware of any lead paint being used on the property. Ask them if tests were performed and what the results were. Lead paint regulations were not issued until 1977 and any paint manufactured after that date should not contain harmful amounts of lead. However, the use of lead paint was not prohibited until 1980. Buildings constructed or renovated between 1940 and 1980 have a much higher probability of having lead paint than those constructed at later dates. Look for chipped or peeling paint found anywhere on the inside or outside of a building. If the building was constructed before 1980 lead paint should be suspected].

Another source of lead in a hazardous state is lead produced by vehicle emissions that, over time, has settled in soil. This is especially a problem in areas that have had a high traffic flow for a number of years. As an example, some New York City neighborhoods have extremely high levels of lead from years of exposure to high traffic use. The advent of unleaded gasoline in the early 1970s has tremendously reduced this problem in newer neighborhoods.

LEAD IN DRINKING WATER

The harmful effects of lead ingested by humans from drinking water are the same as those from lead paints. The combined effect is cumulative.

Most public water has a very low level of lead when it leaves the water treatment plant. It picks up lead from the pipes it travels through from the treatment plant to the human who drinks it. Lead may leach from the lead pipes through which it travels, from the lead solder used to connect copper pipes and from lead used in the manufacture of plumbing fixtures.

It was not until 1986 that Congress passed the *Safe Drinking Water Act 16* which requires the use of "lead-free" solder, lead free pipes and flux for the installation and repair of any public water system or any plumbing in a residential or non-residential facility that is connected to a public water system.

To be classified as lead free, solders and flux can contain no more than 0.2 percent lead and pipes and fittings are considered lead free when they contain no more than 8% lead. Prior to this, a typical solder or flux contained over 50% lead.

Fortunately, as pipes and fixtures get older, they become coated with other minerals from the water and the amount of lead that they shed is substantially reduced. Studies show that the most dangerous periods for lead in water is the first 24 months after the product is used or installed and that the danger substantially reduces after 5 years. Therefore, as the years go by, the problem of lead in drinking water will gradually disappear without any abatement action.

WETLANDS

Wetlands are lands where saturation with water is the dominant factor determining the nature of soil development and the types of plant and animal communities living in the soil and on its surface. Historically wetlands have been considered to be wastelands of little value to society and have been subject to dumping, filling and draining, with little thought given to the consequences caused by these activities. Only relatively recently has the role of wetlands become more understood in maintaining and improving environmental quality.

According to the research department of the American Institute of Real Estate Appraisers, approximately 54% of the country's original wetlands no longer exist. Wetlands have been lost to rising sea levels, erosion, sediment deposition changes, and biotic factors such as overgrazing. Many more have been lost to land reclamation for housing and commerce, landfills and waste disposal, navigation channels and reservoir construction: oil and gas canals and pipelines and strip and peat mining. Agriculture accounts for the majority of wetlands destruction, being responsible for 87% of those lost from the mid 1950s to the mid 1970s. The ecological value of wetlands has been increasingly recognized and studied in recent years. Many diverse groups have lobbied with Congress to halt wetlands destruction since the growing realization of the strategic value of these resources. In the last two decades, much protective legislation restricting wetlands development and use has been issued on federal, state and local levels.

The major piece of federal wetland legislation is Section 404 of the Clean Water Act (33 U. S.F. 1251 et seq.) which stipulates that a permit must be obtained from the U.S. Army Corps of Engineers by individuals or businesses interested in altering wetlands through dredging or filling. This includes most ditching, land clearing and land leveling activities; and construction of levees, dikes, dams and most roads along waterways.

Failure to determine the presence of wetlands on a subject site and whether proposed activities will require a Section 404 permit, as well as compliance with any state and local regulations, can have serious and expensive consequences. In some instances, government agencies have required existing structures to be removed and the land to be returned to its natural state. Wetland legislation can drastically affect highest and best use of real estate containing or bordering wetlands and significantly alter a property's value.

Wetlands can minimize the damage to downstream property owners by decreasing the velocity of the water and acting as a storage basin. When a stream overflows its banks, it spreads horizontally into a surrounding wetland where the vegetation acts as numerous tiny barriers temporarily detaining the water. Along with controlling flood waters, wetlands also serve to maintain water quality. They have a "self-cleaning" ability which can filter or take up pollutants from runoff before they enter an adjoining waterway. In many respects, wetlands function much like sophisticated sewer treatment plants by removing nutrients and other pollutants prior to discharge to a waterway.

A wetland acts as a buffer zone to trap sediments resulting from natural and man-induced erosion. However, increased development along many of the state's watercourses can hinder our wetlands' capability to trap these sediments. Often special measures need to be taken to decrease the sediment runoff in urbanizing areas. The benefits that wetlands provide will become more significant as development intensifies. With increased development, the demand for clean water supplies, flood protection, wildlife and recreation also increases.

Wetlands provide essential wildlife habitat as well. A large number of animals use wetlands as their sole habitat, while others exploit the wetland from time to time for breeding, feeding or refuge. All wetlands function in providing an important source of food for wildlife and thus represent a critical link in life cycles and food chains.

CHAPTER 3

OTHER ENVIRONMENTAL CONSIDERATIONS

This chapter deals with other environmental considerations and are included for informational purposes only. The first item that follows is from EPA and lists household hazardous materials.

Hazardous Residential Waste

In the aftermath of the extensive flooding in Central and South Georgia, the U.S. Environmental Protection Agency gave recommendations for special disposal of household hazardous materials.

Waxes and Polishes (shoe polish, floor waxes, furniture polishes and spray dust cleaners)

Caustic Cleaners (drain, toilet bowl and oven cleaners)

Fertilizers, Lacquers and Thinners

Spot and stain removers

Liquid paint

Used motor oil

Motor oil additives

Aerosols

Transmission fluid and additives

Engine lubricants

Canister or replaceable filter elements**Gasoline and diesel fuel additives****Degreasers** (engine cleaners-most are solvents)**Solvents** (mineral spirits, turpentine, alcohols, cresol, naphtha)**Pesticides** (including but not limited to yard and garden sprays, roach powder, flea and tick products -for pets, fly strips, moth balls, personal bug sprays or stick creams, rodenticides, fungicides, algicides and herbicides)

Other hazardous materials which the EPA said would not be accepted in this cleanup included: explosives, shock sensitive chemicals and organic peroxides, infectious wastes, radioactive wastes, such as smoke detectors, gas (propane) cylinders and other pressurized containers.

Types of Disposal Sites

Dumps - A site where wastes have been disposed, perhaps indiscriminately, and not in compliance with any disposal requirements. Dumps are not lined and the disposal materials, may be hazardous, can be piles along the side of roads or thrown into a pit/ditch or over a hillside.

Landfill - A waste disposal system, where the waste is compacted and covered over, for disposing of debris, process wastes and sludges including industrial wastes.

Surface Impoundments - Usually a manmade lined site into which waste material, that can be a solid or a liquid, can be disposed of

Endangered Species - Birds, fish, plants, and reptiles that are rare and maybe close to extinction.

Formaldehyde - A colorless gaseous chemical compound. It has a pungent odor that is a nuisance rather than a hazardous substance.

Indoor Air Pollution - Chemicals that are released inside a building can create indoor air pollution and can cause a "sick building syndrome"

PCB's (Polychlorinated Biphenyls) - PCBs are used in electric and hydraulic equipment. PCB's have to be ingested to be harmful.

Radiological Hazards - A substance is radioactive when the center of atoms break apart and form other elements. This process gives off energy in the form of particles and electromagnetic waves

Chapter 4**ENVIRONMENTAL SITE ASSESSMENT
TRANSACTION SCREEN QUESTIONNAIRE**

This document is an excerpt of E 1528-93: Standard Practice for Environmental Site Assessments: Transaction Screen Process, which is under the jurisdiction of ASTM Committee E-50 on Environmental Assessment and is the direct responsibility of Subcommittee E 50.02 on Commercial Real Estate Transactions. This questionnaire represents only items 5.1 through 6.1 of E 1528-93 and should not be construed as being the complete standard. It is necessary to refer to the full standard prior to using this questionnaire. COPY-

RIGHT 1993 AMERICAN SOCIETY FOR TESTING AND MATERIALS, Philadelphia, PA-PCN: 13-515280-65. For the complete standard, or to order additional copies of this questionnaire, contact ASTM Customer Service at (215) 299-5585.

5. Introduction to Transaction Screen Questionnaire

5.1 Process-The transaction screen process consists of asking questions contained within the transaction screen questionnaire of owners and occupants of the property, observing site conditions at the property with direction provided by the transaction screen questionnaire, and, to the extent reasonably, ascertainable, conducting limited research regarding certain government records and certain standard historical sources. The questions asked of owners when conducting site visits are the same questions as those asked of occupants.

5.2 Guide-The transaction screen questionnaire is followed by a guide designed to assist the person completing the transaction screen questionnaire. The guide to the transaction screen questionnaire is set out in Sections 7 through 10 of this practice. The guide is divided into three sections: Guide for Owner/Occupant Inquiry, Guide to Site Visit, and Guide to Government Records/Historical Sources Inquiry.

5.2.1 To assist the user, its employee or agent, or the environmental professional in preparing a report, the guide repeats each of the questions set out in the transaction screen questionnaire in both the guide for owner/occupant inquiry and the guide to site visit. The questions regarding government records/historical sources inquiry are also repeated in the guide to that section.

5.2.2 The guide also describes the procedures to be followed to determine if reliance upon the information in a prior environmental site assessment is appropriate under this practice.

5.2.3 A user, his employee or agent, or environmental professional conducting the transaction screen process should not use the transaction screen questionnaire without reference to, or familiarity from prior usage with, the guide.

5.3 User and Preparer-The user conducting the transaction screen process is the party seeking to perform appropriate inquiry with respect to the property. The user may delegate the preparation of the transaction screen questionnaire to an employee or agent of the user or may contract with a third party to prepare the questionnaire on behalf of the user. The person preparing the questionnaire is the preparer who may be either the user or the person to whom the user has delegated the preparation of the transaction screen questionnaire.

5.4 Exercise of Care-The preparer conducting the transaction screen process should use good faith efforts in determining answers to the questions set forth in the transaction screen questionnaire. The user should take time and care to check whatever records are in the user's possession. The preparer should ask all persons to whom questions are directed to give answers to the best of the respondent's knowledge. As required by Section 9601(35)(B) of CERCLA, the user or preparer should discuss with a responsible person in authority in the user's organization (if any) any specialized knowledge or experience relating to hazardous substances on the property and the preparer should understand such information.

5.5 Knowledge-The owner or occupant of the property to which portions of the transaction screen questionnaire are directed should have sufficient knowledge and experience with respect to the property or in the owner's or occupant's particular business to understand the purpose and use of the transaction screen questionnaire. All answers should be given to the best of the owner's or occupant's actual knowledge.

5.5.1 While the Person conducting the transaction screen process has an obligation to ask the questions set

forth in the transaction screen questionnaire, in many instances the parties to whom the questions are addressed will have no obligation to answer them. The user is only required to obtain information to the extent it is reasonably ascertainable.

5.5.2 If the preparer asks the questions set forth in the transaction screen questionnaire, but does not receive any response or receives partial responses, the questions will be deemed to have been answered provided the questions have been asked, or were attempted to be asked, in person or by telephone and written records have been kept of the person to whom the questions were addressed and their responses, or the questions have been asked in writing sent by certified or registered mail, return receipt requested, postage prepaid, or by private, commercial overnight carrier and no responses have been obtained after at least two follow-up telephone calls were made or written request was sent again asking for responses.

5.5.3 The transaction screen questionnaire and the transaction screen guide sometimes include the phrase "to the best of your knowledge." Use of this phrase shall not be interpreted as imposing a constructive knowledge standard when it is not included or as imposing anything other than an actual knowledge standard for the person answering the questions, regardless of whether it is used. It is sometimes included as an assurance to the person being questioned that he or she is not obligated to search out information he or she does not currently have in order to answer the particular question.

5.6 *Conclusions Regarding Affirmative or Unknown Answers*-If any of the questions set forth in the transaction screen questionnaire are answered in the affirmative, the user must document the reason for the affirmative answer. If any of the questions are not answered or the answer is unknown, the user should document such nonresponse or answer as unknown and evaluate it in light of the other information obtained in the transaction screen process, including, in particular, the site visit and the government records/historical sources inquiry. If the user decides no further inquiry is warranted after receiving no response, an answer of unknown or an affirmative answer, the user must document the reasons for any such conclusion.

5.6.1 Upon obtaining an affirmative answer, an answer of unknown or no response, the user should first refer to the guide. The guide may provide sufficient explanation to allow a user to conclude that no further inquiry is appropriate with respect to the particular question.

5.6.2 If the guide to a particular question does not, in itself, permit a user to conclude that no further inquiry is appropriate, then the user should consider other information obtained from the transaction screen process relating to this question. For example, while on the site performing a site visit, a person may find a storage tank on the property and therefore answer Question 10 of the transaction screen questionnaire in the affirmative. However, during or subsequent to the owner/ occupant inquiry the owner may produce evidence that substances now or historically contained in the tank (e.g., water) are not likely to cause contamination.

5.6.3 If either the guide to the question or other information obtained during the transaction screen process does not permit a user to conclude no further inquiry is appropriate with respect to such question, then the user must determine, in the exercise of the user's reasonable business judgment, based upon the totality of unresolved affirmative answers or answers of unknown received during the transaction screen process, whether further inquiry may be limited to those specific issues identified as of concern or should proceed with the full Phase I Environmental Site Assessment.

5.7 *Presumption*-A presumption exists that further inquiry is necessary if an affirmative answer is given to a question because the answer was unknown or no response was given. In rebutting this presumption, the user should evaluate information obtained from each component of the transaction screen process and consider whether sufficient information has been obtained

to conclude that no further inquiry is necessary. The user must determine, in the exercise of the user's reasonable business judgment, the scope of such further inquiry, whether to proceed with a Phase I Environmental Site Assessment prepared in accordance with Practice E 1527 or a lesser inquiry directed at specific issues raised by the questionnaire.

5.8 Further Inquiry Under Practice E 1527-Upon completing the transaction screen questionnaire, if the user concludes that a Phase I Environmental Site Assessment is needed, the user should proceed with such inquiry with the advice and guidance of an environmental professional. Such further inquiry should be undertaken in accordance with Practice E 1527.

5.9 Signature-The user and the preparer of the transaction screen questionnaire must complete and sign the questionnaire as provided at the end of the questionnaire.

6. Transaction Screen Questionnaire

6.1 Persons to be Questioned-The following questions should be asked of (1) the current owner of the property, (2) any major occupant of the property or, if the property does not have any major occupants, at least 10% of the occupants of the property, and (3) in addition to the current owner and the occupants identified in (2), any occupant likely to be using, treating, generating, storing or disposing of hazardous substances or petroleum products on or from the property. A major occupant is any occupant using at least 40% of the leasable area of the property or any anchor tenant when the property is a shopping center. In a multifamily property containing both residential and commercial uses, the preparer does not need to ask questions of the residential occupants. The preparer should ask each person to answer all questions to the best of the respondent's actual knowledge and in good faith. When completing the site visit column, the preparer should be sure to observe the property and any buildings and other structures on the property. The guide provides further details on the appropriate use of this questionnaire.

Description of Site: Address:

Question	Owner	Occupants (if applicable)	Observed During Site Visit
1. Is the property or an adjoining property used for an industrial use?	Yes No	Yes No Unk	Yes No Unk
2. To the best of your knowledge, has the property or any adjoining property been used for an industrial use in the past?	Yes No	Yes No Unk	Yes No Unk
3. Is the property or any adjoining property used as a gasoline station, motor repair facility, commercial printing facility, dry cleaners, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal,			

processing, or recycling facility?	Yes No	Yes No Unk	Yes No Unk
4. To the best of your knowledge, has the property or any adjoining property been used as a gasoline station, motor repair facility, commercial printing facility, dry cleaners, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal, processing, or recycling facility?	Yes No	Yes No Unk	Yes No Unk
5. Are there currently, or to the best of your knowledge have there been previously, any damaged or discarded automotive or industrial batteries, or pesticides, paints or other chemicals in individual containers of greater than 5 gal (19 L) in volume or 50 gal (19 L) in the aggregate, stored on or used at the property or at the facility?	Yes No	Yes No Unk	Yes No Unk
6. Are there currently, or to the best of your knowledge have there been previously, any industrial drums Typically 55 gal (208 L) or sacks of chemicals located on the property or at the facility?	Yes No	Yes No Unk	Yes No Unk
7. Has fill dirt been brought onto the property that originated from a contaminated site or that is of unknown origin?	Yes No	Yes No Unk	Yes No Unk
8. Are there currently, or to the best of your knowledge have there been previously, any pits, ponds, or lagoons located on the property in connection with waste treatment or waste disposal?	Yes No	Yes No Unk	Yes No Unk
9. Is there currently, or to the best of your knowledge has there been previously, any stained soil on the property?	Yes No	Yes No Unk	Yes No Unk
10. Are there currently, or to the best of your knowledge have there been previously, any registered or unregistered storage tanks (above or underground) located on the property?	Yes No	Yes No Unk	Yes No Unk
11. Are there currently, or to the best			

of your knowledge have there been previously, any vent pipes, fill pipes, or access ways indicating a fill pipe protruding from the ground on the property or adjacent to any structure located on the property?

Yes No

Yes No Unk

Yes No Unk

12. Are there currently, or to the best of your knowledge have there been previously, any flooring, drains, or walls located within the facility that are stained by substances other than water or are emitting foul odors?

Yes No

Yes No Unk

Yes No Unk

13. If the property is served by a private well or non-public water system, have contaminants been identified in the well or system that exceed guidelines applicable to the water system or has the well been designated as contaminated by any government environmental/health agency?

Yes No

Yes No Unk

Yes No Unk

14. Does the owner or occupant of the property have any knowledge of environmental liens or governmental notification relating to past or recurrent violations of environmental laws with respect to the property or any facility located on the property?

Yes No

Yes No Unk

Yes No Unk

15. Has the owner or occupant of the property been informed of the past or current existence of hazardous substances or petroleum products or environmental violations with respect to the property or any facility located on the property?

Yes No

Yes No Unk

Yes No Unk

16. Does the owner or occupant of the property have any knowledge of any environmental site assessment of the property or facility that indicated the presence of hazardous substances or petroleum products on, or contamination of, the property or recommended further assessment of the property?

Yes No

Yes No Unk

Yes No Unk

17. Does the owner or occupant of the property know of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any hazardous substance or petroleum products involving the property by any owner or occupant of the property?

Yes No

Yes No Unk

Yes No Unk

18. Does the property discharge wastewater on or adjacent to the property other than storm water into a sanitary sewer system?

Yes No

Yes No Unk

Yes No Unk

19. To the best of your knowledge, have any hazardous substances or petroleum products, unidentified waste materials, tires, automotive or industrial batteries or any other waste materials been dumped above grade, buried and/or burned, on the property?

Yes No

Yes No Unk

Yes No Unk

20. Is there a transformer, capacitor, or any hydraulic equipment for which there are any records indicating the presence of PCB's?

Yes No

Yes No Unk

Yes No Unk

Government Records/Historical Sources Inquiry

(See guide. Section 10 or ASTM E 1528-93)

21. Do any of the following Federal government record systems list the property or any property within the circumference of the area noted below:

National Priorities List (NPL) - within 1.0 mile (1.6 km)?

Yes No

CERCLIS List-within 0.5 mile (0.8 km)?

Yes No

RCRA TSD Facilities-within 1.0 mile (1.6 km)?

Yes No

22. Do any of the following state record systems list the property or any property within the circumference of the area noted below:

List maintained by state environmental agency of hazardous waste sites identified for investigation or remediation that is the state agency equivalent to NPL-within approximately 1.0 mile (1.6 km)?

Yes No

List maintained by state environmental agency of sites identified for investigation or remediation that is the state equivalent to CERCLIS within 0.5 mile (0.8 km)?

Yes No

Solid Waste/Landfill Facilities-within 0.5 mile (0.8 km)?

Yes No

The preparer of the transation screen questionnaire must complete and sign the following statement. (For definition of preparer and user, see 5.3 or 3.3.25 of ASTM E 1528-93.)

This questionnaire was completed by:

Name _____

Title _____

Firm _____

Address _____

Phone number _____

Date _____

If the preparer is different than the user, complete the following:

Name of user _____

User's address _____

Preparer's relationship to site _____

Preparer's relationship to user _____
(for example, principle, employee, agent, consultant)

Copies of the completed questionnaire have been filed at: _____

Copies of the completed questionnaire have been mailed or delivered to: _____

Preparer represents that to the best of the preparer's knowledge the above statements and facts are true and correct and to the best of the preparer's actual knowledge, no material facts have been suppressed or misstated.

Signature _____ Date _____

Signature _____ Date _____

Signature _____ Date _____

OBJECTIVE

The purpose of an Environmental Due Diligence Site Assessment (EDDSA) based on this guide is to identify recognized environmental conditions, to the extent feasible, in accordance with the processes described herein. Although a common purpose of an EDDSA is to satisfy one of the requirements to qualify for the innocent purchaser defense, it may be used for a number of reasons, such as a management tool. The industry standards for commercial real estate are the two by ASTM (formerly the American Society for Testing and Materials). ASTM is a respected industry organization that sets standards for many products, materials, systems and services. The main difference between these two ASTM environmental site assessment standards is the amount of appropriate inquiry that needs to be conducted.

The innocent purchaser defense legislation did not set standards to be followed in order to comply with the act, but indicated that an industry standard should be created. The ASTM environmental site assessment standards are an attempt to comply with this law as does this guide.

This guide, including the expandable questionnaires, allows the preparer to conduct all appropriate inquiry for the user, be it a Screen or a Phase I equivalent, without having to resort to other guidelines, documents or questionnaires. Also, this guide includes environmental issues of radon, lead in paint, lead in drinking water, asbestos, wetlands, endangered species, stormwater runoff and other regulatory concerns.

This guide, along with the questionnaires, has been designed so that the user/purchaser can satisfy one of the requirements to qualify for CERCLA's "innocent purchaser defense." It is absolutely necessary that the user be involved in all of the aspects of conducting the "all appropriate inquiry". It is the user who decides when further inquiry is desired. Hence, the user can decide at any time that further inquiry is NOT desired or that further inquiry is desired. Again, it is the user who makes these decisions

There is a provision on the back page of each questionnaire (i.e. residential, non-residential structure, etc.) for the user to indicate that there's (i.e. for intent of the transaction) a need for further inquiry or that there's no need to proceed with further inquiry. The user's signature is required for each of the appropriate questionnaires as well as on the report's cover page in order that the user/purchaser can indicate the user's total concurrence.

The expandable questionnaire, which is non-bound (i.e. loose pages) and is a part of this guide, has been designed so that the preparer or user may employ those sections, and as many times as needed, that apply to a specific site. Each section of the questionnaire is complete in itself and, for example, the section on adjoining properties can be included as many times as necessary. When the subject site is large, there could be many different uses on the adjoining properties. The preparer or user would complete an "adjoining property section" for each of the adjoining properties.

This guide addresses the CERCLA requirements in order to satisfy one of the requirements to qualify for CERCLA's innocent purchaser defense in self-contained sections, plus other sections for agricultural concerns that might need to be addressed in order for the assessment to conform to the "all appropriate inquiry" requirements, such as disposal practices and the proper use and storage of pesticides.

Any actual knowledge that environmental contamination exists or that there is suspect environmental contamination on an agricultural parcel of land or in a structure on the land does not necessarily require that sampling be conducted. Even if the contamination is considered to be a hazardous substance, the degree of contamination could be so insignificant that it does not present a material risk to human health or the environment. Such a condition would not warrant further inquiry.

In some cases, information obtained during the non-intrusive investigations may require additional non-intrusive investigation in order to satisfy the "all appropriate inquiry" requirement.

QUESTIONNAIRE. SECTIONS SA THRU SF

Section SA: This section is for a residential structure and contents only. The preparer or user is to complete a copy of this Section for each attached or detached residential unit (i.e. for each house, duplex, apartment or mobile home) on the subject property. The preparer or user is to use a Section C questionnaire for all land-use(s) inquiries.

Note: The back side of each Section has an area for: comments, signature, etc. for the preparer, reviewer, or supervisor and user; and an option to indicate if it is felt that further inquiry is needed or not needed.

Section SB: The Section is for non-residential structures and contents only. The preparer or user is to complete a copy of this Section for each non-residential structure, even if attached to a residential unit or consists of a roof only, on the subject property. The preparer or user is to use a Section C questionnaire for all land-use(s) inquiries.

Section SC: This Section is for land issues and uses, on the subject property, only. All areas, present and past uses, should be identified by completing a copy of this Section for each individual area and the preparer or user is to complete a copy for each area.

If the subject property has many environmental concerns or is large in area, it is advisable to subdivide into smaller parts (not necessarily equal parts) in order to describe what exists and where located. When subdivided, a drawing or map, showing and labeling each division, shall be included in the appendices.

Section SD: This Section is for adjoining properties. The preparer or user is to complete a copy of this Section for each adjoining property.

Section SE: This Section is for the preparer or user for conducting inquiry into government records and historical sources for the subject site.

Section SF: This Section is for the preparer or user to use for other inquiries that are significant on the subject site.

A Non-Intrusive All Inclusive

**ENVIRONMENTAL DUE DILIGENCE
SITE ASSESSMENT**

**A Screen Process that Expands
into a Phase I Equivalent**

On

For

Date of Last Site Inspection _____ Report Issue Date _____

Signature of Preparer: _____ Date _____

Address: _____

Phone No.: _____

Signature of Preparer: _____ Date _____

Address: _____

Phone No.: _____

Project No.

Table of Contents

Summary

Introduction

Site Description

Questionnaire	S _____ -S _____	
Section A.	Residential Structure(s)	SA1 of
Section B.	Non-Residential Structure(s)	SB1 of
Section C.	Land Issues and Site Visit	SC1 of
Section D.	Adjoining Properties	SD1 of
Section E.	Records Inquiry	SE1 of
Section F.	Other Inquiries	SF1 of

Optional Appendices

Copy of Contract

Legal Maps, Photos

Regulatory Documentation

Interview Documentation

Preparer's Qualifications

Questionnaire-Residential Structures Section A (SA)

This section is for a residential structure and contents only. Complete a copy of this Section for each attached or detached residential unit for each house, duplex, apartment, or mobile home on the subject property. Use Section C for all land inquiries.

Description of unit _____

Year(s) of construction and major remodeling _____

Has the structure ever been used for anything other than residential? _____

If yes, for what purpose? _____

CERCLA Based Concerns

Are there toxic materials, including pesticides or herbicides, stored in the structure indicating more than household use? _____

Non-CERCLA Concerns

Is there any obviously suspect, friable, exposed asbestos? _____

Does the EPA Map of Radon Zones for the county in which the subject property is located indicate a predicted annual average radon level greater than 4 pci/L? _____

Has the subject structure been tested by a qualified professional and the annual average level determined to be greater than pci/L? _____

Has the radon level in a structure in the general location of the subject property been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? _____

For the source of drinking water:

Is the subject structure served by a private well _____, a non-public water system _____, or a public water system _____?

If served by a private well or non-public water system, has the drinking water source been tested for contaminants, other than bacteria, and found to exceed the criteria of the appropriate regulatory agency? _____
List all contaminants that exceed their criteria in the comments for this structure in this section.

Regardless of the source of the drinking water, has a water sample, taken from inside the structure, been determined to contain lead in excess of 10 ug/L? _____

ANSWER CODE: Y for Yes, N for no, U for unknown, NA for not appropriate

Comments: _____

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

REVIEWER or SUPERVISOR:
I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

USER: The user feels that there is need, no need for further inquiry into this section of this environmental assessment.

_____ printed name _____ signature _____ date
_____ address
_____ phone number _____ fax number

Questionnaire - Land Issues and Site Visit Section C (SC)

This section is for land issues and uses, on the subject property, only. All areas, present and past uses, as listed here (as well as other not mentioned) should be identified by completing a copy of this section for each individual environmental concern: UST's; AST's; disposal areas including septic tanks, ponds, pit and lagoons that are or were used for disposal; storage areas, mixing areas, maintenance areas.

If the subject property has many of these concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what is found and where located. When sub-divided, a drawing or map, showing and labeling each subdivision, shall be included in the appendices.

CERCLA Based Concerns: Are there any: UST's _____; AST's _____; Disposal Areas _____; Septic Tanks _____; Ponds, Pits or Lagoons that are or ever were used for disposal _____; Storage Areas _____; Mixing Areas _____; Maintenance Areas _____; Landfills or Dumps _____; Stained or Discolored Soil _____; Areas Lacking Vegetation and/or having Stressed Vegetation _____; Fill Dirt _____; Suspicious Mounds or Recesses _____; Are there any Transformers or Hydraulic Equipment that might indicate PCB's _____?

For yes answer(s):

Is the area within 100 feet of a drinking water well? _____
Which area(s)?

Describe the area(s) in the comments portion of this section.

Has the subject property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, or injection well(s)? _____
If yes, describe in comments portion.

Does surface or stormwater flow on to the subject property? _____
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? _____

If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? _____

If yes, describe in comments portion.

Describe in comments:

Any suspicious, potentially hazardous substances, operations, landfills, drums or disposal area(s) that are within approximately 1/8 mile (200 m) of the subject property.

Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? _____

If yes, describe in comments

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Questionnaire - Section E (SE)

GOVERNMENT RECORDS/HISTORICAL SOURCES INQUIRY

Do any of the following Federal government record systems list the Property or any property within the circumference of the area noted below:

National Priorities List - within 1.0 mile/1.6 KM?	Yes	No
CERCLIS List - within .5 mile/.8 KM?	Yes	No
RCRA-TSD Facilities - within 1.0 mile/1.6 KM?	Yes	No

Do any of the following State record systems list the property or any property within the circumference of the area noted below:

List maintained by State Environmental Agency of hazardous waste sites identified for investigation or remediation that is the State agency equivalent of NPL - within approximately 1.0 mile/1.6 KM?	Yes	No
List maintained by State Environmental Agency of sites identified for investigation or remediation that is the state equivalent to CERCLIS within .5 mile/.8 KM?	Yes	No
Leaking Underground Storage Tank (LUST) List-within .5 mile/.8 KM?	Yes	No
Solid Waste/Landfill Facilities - within .5 mile/.8 KM?	Yes	No

Questionnaire - Other Inquiries - Section F (SF)

Additional Comments - Section S

CERCLA - The Comprehensive Environmental Response, Compensation and Liability Act of 1980

CERCLA is also known as Superfund. CERCLA affixed joint, several and strict liability for persons, corporations, and/or owners/operators for any site declared to be an imminent hazard to human health or the environment. (This means that any potentially liable party can be forced to pay for the entire cost of cleanup, regardless of fault.)

Superfund provided the federal government the ability to take emergency (remedial action) to clean up both abandoned and existing disposal sites whenever a release or threat of release of hazardous substance, which compose imminent and substantial danger to public health and welfare.

CERCLA defines four categories of persons who are financially responsible for hazardous waste cleanup:

- A) Present owner of the contaminated property;
- B) Past owners and operators of the facility which operated at the time when the hazardous substance was disposed of on the site;
- C) Parties who arrange for on-site treatment and disposal of waste, and;
- D) Parties who transport the hazardous substances.

SARA - The Superfund Amendments and Reauthorization Act of 1986

SARA contains provisions defining who is liable for cleanup of contamination caused by past activities. SARA amended CERCLA, creating an “innocent purchaser” defense.

To claim innocence, the property owner must demonstrate that at the time of purchase there was “no reason to know” that the property was contaminated and that “all good and commercial or customary practice” was undertaken to detect such potential. Further, the landowner must also demonstrate that “all appropriate inquiry” into prior uses of the property “consistent with good commercial or customary practices” was undertaken to detect the potential contamination.

SARA increases the amount in Superfund to \$8.5 billion and sets completion deadlines for clean-up projects. In addition, SARA increased EPA’s enforcement authority in cost recover, recordkeeping and site visits. SARA, Section 126, requires federal OSHA to promulgate a health and safety standard for workers engaged in hazardous waste operations.

Historical Record Review

- 1) Review the use and improvements made to the site by conducting a title search, interviewing last and present owners, neighbors, and anyone else who may have knowledge of the history of the property such as building inspectors, health inspectors and assessors.
- 2) Review records, permits, and licenses that give information on what has been built or installed on the property. This includes building, zoning, planning, sewer, water, fire, environmental and other department records that would have information on or have an interest in the property and neighboring properties.
- 3) An investigation of the subject property in “neighboring properties with regard to the F.1. As National Priority List or Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) List and similar state lists showing known locations of hazardous waste sites.

The following are suggested Federal and State Standard Environmental Record Sources:

- Federal NLP Site List (1 mile)

-
-
- Federal CERCLIS List (.5 mile)
 - Federal RCRA TSD Facilities List (1 mile)
 - Federal RCRA Generators List (Property and adjoining property)
 - Federal ERNS List (Property only)
 - State Lists of Hazardous Waste Sites
 - State Landfill and/or Solid Waste Disposal (.5 mile)
 - State Leaking UST List (.5 mile)
 - State Registered UST Lists (Property and adjoining property)

4)Analyze aerial photographs to determine the construction or destruction of buildings and the existence of ponds and disposal areas on the property over time.

5)A review of the Department of Health Services, Solid Waste Management Board, Regional Water Quality Control Board, Air Quality management District, and other Boards or Agencies records whose actions may affect the subject property and neighboring properties.

How to Obtain Information About a Property

There are a number of ways to obtain environmental information about a property in addition to direct observation. Some of these are:

Title Search-This will show the history of ownership of the property. Look for past owners who have operated a business that could have used or produced hazardous materials or waste. Some residential properties may have been developed on sites that were commercial, industrial or agricultural or may have soil problems from previous owners or operators.

Municipal Fire Department or State Fire Marshal - This is a good source for discovering if any action or response has been taken with regard to a property.

City-Building permits and sewer discharge permits can disclose the nature of a business that was or is operated from a property. Some residential properties are leased for business purposes and have out-buildings that may have been used to run the business. Building permits may give a clue to the nature of the business.

County-Air pollution, sewer and septic records available from the county may indicate environmental problems.

EPA-ID numbers, sites, air permits and other information may exist on a property. Any past action or complaints about a property will be available.

State Agencies-All states have official departments to regulate air quality, water, wastes, etc. These are good sources of information to determine if past problems have existed.

Utility Companies-Utilities often have detailed records of any environmental problems reported or observed.

Aerial Photographs-This is often the easiest way to look at surrounding property. If it is possible to obtain older photos as well as recent photos, the inspector will have a good idea of the type of previous and current activities on or adjacent to the subject property. Look for the construction or destruction of buildings and the existence of ponds or disposal areas on or near the site.

Environmental Consultants-This is an expensive way to find information and should be used only at a clients request. Generally it is not part of the Phase I Environmental Inspection, and is suited more to a Phase II Environmental Audit.

Site Inspection-Visual Observation of the Property

1)An inspection entails observing the subject site and adjacent and surrounding properties within a 1/2 mile radius. Look for improvements made to the subject property with particular attention to the use of hazardous materials in the structure or operating equipment.

2)Identify the: presence or potential presence of Hazardous Wastes; Leaking Underground Storage Tanks; Contaminated Drinking Water, Soil and Groundwater; Asbestos; UREA Formaldehyde Foam Insulation; Lead Paint; Pesticides and Herbicides; PCBs; Radon and Electromagnetic Fields.

Appendix

Two Case Studies

- Non-Agricultural Related**

*A vacant one acre site that at one time
was a manufacturing facility*

- Chemical Related**

Deals with a chemical facility

A Non-Intrusive Case Study #1

INFORMATION

For this case study, a non-intrusive Environmental Site Assessment (ESA) was deemed appropriate since the subject one acre site was used for various (some unknown) types of operations. The objective of conducting an ESA is to evaluate the environmental condition of a site by investigating recognized environmental conditions in order to determine whether hazardous substances or petroleum products have been disposed of at the subject site. An ESA is intended to provide the level of knowledge necessary to satisfy the innocent landowner defense. That is, the completion will conclude that either (a) the ESA has provided sufficient information from which to determine that there is no reasonable basis for suspecting the presence of hazardous substances or petroleum products at the subject site, or (b) the ESA has confirmed the possible presence of hazardous substances or petroleum products at the subject site. Also, due to the suspect different types of operations over the years, an ESA was considered appropriate since it was decided that all appropriate inquiry could not be accomplished within twenty (20) days. Referring to 7.1.4.2 in ASTM Phase I Standard Practice, E1527, information that is obtainable within reasonable time and cost constraints, means that the information can be obtained within twenty (20) days.

There are two buildings on the subject site. The user has informed the preparer that, to the best available knowledge, the subject site was used at various times:

- The front building as a lumber curing/drying only facility, perhaps 50 years ago.
- The rear building for fertilizer manufacturing, perhaps 40 years ago.
- Part of the front building was used in the last ten (10) years as an auto repair shop, not a body shop.

Regarding the two buildings on the subject site: the front building (see photos 1 & 2, and 5-8 for indoor conditions) appears to be in fair-to-good condition. The all-wooden rear building is in very poor condition, as is shown in photos 3, 4 and 9. There are four above ground tanks, as shown in photos 3 and 10, that supposedly stored nitrogen for use in fertilizer production, and are on the railroad right-of-way.

ADJOINING PROPERTIES

The adjoining property to the west and across the street from the subject site is undeveloped and is used for baseball/softball games.

The adjoining property to the north is shown in photos 2, 3 and 11. For this case study, this adjoining property is a grain storage facility.

The adjoining property to the south is shown in photo 12. For this case study, this adjoining property is a vehicle/motor repair shop.

Immediately to the east of the subject site is a railroad line. There is undeveloped property on the other side of the railroad tracks.

A Non-Intrusive All Inclusive

**ENVIRONMENTAL DUE DILIGENCE
SITE ASSESSMENT**

**For: M.A. BELL
THE BELL ACRE
-ONE ACRE-**

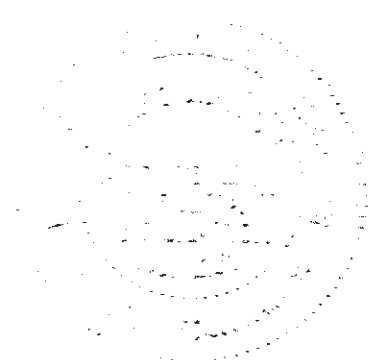
**On
HARD-TO-FIND WAY
WAYOUT, THERE
12378**

**For
LAST STATE BANK
NOWHAT, TH.
12345**

Date of Last Site Inspection 10/06/94, Report Issue Date 10/07/94

Signature & Date of Preparer: _____ Date: 10/07/94
Address: _____
Phone No.: _____

Signature & Date of User: _____ Date: 20/07/94
Address: _____
Phone No.: _____



Project No. 94P2A01

A NON-INTRUSIVE
ENVIRONMENTAL SITE ASSESSMENT

SUMMARY

THE INTENT OF THIS NON-INTRUSIVE ENVIRONMENTAL SITE ASSESSMENT (ESA) WAS FOR THE DETERMINATION OF RECOGNIZED ENVIRONMENTAL CONDITIONS. READILY APPARENT OR SUSPECTED, ON A VACANT ONE ACRE SITE, THAT AT ONE TIME WAS A MANUFACTURING FACILITY, ON HARD-TO-FIND WAY, WAYOUT, THERE, USA. THIS "ALL APPROPRIATE INQUIRY" ESA WAS CONDUCTED ON OCTOBER 2 THRU OCTOBER 6, 1994 ON THE AUTHORIZATION OF THE PRESENT OWNER, MR. M. A. BELL.

INTRODUCTION

THE PURPOSE OF THIS NON-INTRUSIVE ESA REPORT IS TO DOCUMENT THE FACT FINDING EFFORTS THAT WERE USED TO DETERMINE THE POTENTIAL RECOGNIZED ENVIRONMENTAL CONDITIONS RELATED TO THE SUBJECT PROPERTY AND THE ADJOINING PROPERTIES. IT IS NOT NECESSARILY INTENDED OR DESIGNED TO FULLY COMPLY WITH ALL APPLICABLE FEDERAL AND/OR STATE ENVIRONMENTAL STATUTES, BUT RATHER IS LIMITED TO THE SPECIFIC MATTERS STATED HEREIN THAT MAKE UP THE DIFFERENT QUESTIONNAIRES.

SITE DESCRIPTION

THE VACANT ONE ACRE SITE IS ON HARD-TO-FIND WAY, WAYOUT, THERE, USA, ABOUT ONE BLOCK EAST OF STATE ROAD #121. THERE ARE NO RESIDENTIAL STRUCTURES ON THE SUBJECT SITE WHICH IS IN AN AREA OF COMMERCIAL AND MANUFACTURING ENTERPRISES. THERE ARE TWO BUILDINGS ON THE SUBJECT SITE, BOTH OF WHICH WERE VACANT ON THE INSPECTION DATES. THE FRONT BUILDING WAS IN FAIR-TO-GOOD CONDITION, BUT THE REAR BUILDING WAS IN VERY POOR CONDITION.

FINDINGS

THE QUESTIONNAIRES, THAT WERE SELECTED FOR USE ON THIS ESA, CONTAIN THE PREPARER'S OBSERVATIONS THAT WERE ARRIVED AT BY THE SITE INSPECTIONS AND CONVERSATIONS WITH THE OWNER AND OTHERS. ON THE BACK SIDE OF EACH QUESTIONNAIRE IS THE PREPARER'S STATEMENT OF NEED OR NO NEED FOR FURTHER INQUIRY INTO THE APPROPRIATE SECTION OF THE ESA. THE QUESTIONNAIRE DEALING WITH THE FRONT BUILDING AND TWO OF THE SECTION D QUESTIONNAIRES, ON THE PROPERTIES TO THE NORTH AND SOUTH, INDICATE THAT FURTHER INQUIRY IS NEEDED.

Questionnaire - Non-Residential Structure(s) - Section B (SB)

This section is for non-residential structure and contents only. Complete a copy of this Section for each non-residential structure on the subject property, even if it is attached to a residential structure or consists of only a roof.

Use Section C for all land inquiries. This questionnaire is for the front structure.

Size, Age, Description, Location and Purpose of this structure: _____

Size: approx. 40,000 sq. ft. Age: 40+ years. Brick, in fair to good condition, on Hard-To-Find Way in Wayout, There.

For purpose, see the following:

Present and past uses of this structure: _____

The preparer was advised by the present owner that this structure was used at various times as a lumber curing/drying only facility and an auto repair facility.

CERCLA Based Concerns

- o Are there any observed electrical or hydraulic equipment with labels indicating PCB's in the structure? N
- o Are there any stained/discolored floors or walls in the structure? Y (See photos 5-8)
If yes, explain in the comments section for this structure.
- o Are there any suspected hazardous substances stored in this structure? U (See Photos 5-8)
If yes, list all suspected substances, the estimated amounts and the type of container for each:

(If needed continue in Comments on other side.)

Answer Code: Y for yes, N for no, U for unknown, and NA for not applicable

Page SB 1 of 4

Comments:

The stained/discolored floor and the 55 gal. drums and 5 gal. pails
(see photos 5-8) require further investigation.

If more space is needed use the Additional Comments page.

PREPARER:

The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

123 Main Street, Anytown, USA		
address		
_____	_____	_____
111-222-3333	111-222-3334	
phone number	fax number	

REVIEWER:
SUPERVISOR

I feel that there is need, ~~no need~~ for further inquiry into this or section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		
_____	_____	_____
phone number	fax number	

USER:

The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

456 Broad Street. Anytown, USA 99999		
address		
_____	_____	_____
111-456-7890	same	
phone number	fax number	

Questionnaire - Non-Residential Structure(s) - Section B (SB)

This section is for non-residential structure and contents only. Complete a copy of this Section for each non-residential structure on the subject property, even if it is attached to a residential structure or consists of only a roof.

Use Section C for all land inquiries. This questionnaire is for the rear structure.

Size, Age, Description, Location and Purpose of this structure: _____

Size: approx. 100,000 sq. ft. Age: 40+ years. All wooden, in very poor condition, on Hard-To-Find Way in Wayout, There.

For purpose, see the following:

Present and past uses of this structure: _____

The present owner informed the preparer that this structure was used for fertilizer manufacturing.

CERCLA Based Concerns

o Are there any observed electrical or hydraulic equipment with labels indicating PCB's in the structure? N

o Are there any stained/discolored floors or walls in the structure? N
If yes, explain in the comments section for this structure.

o Are there any suspected hazardous substances stored in this structure? N
If yes, list all suspected substances, the estimated amounts and the type of container for each:

(If needed continue in Comments on other side.)

Answer Code: Y for yes, N for no, U for unknown, and NA for not applicable

Comments:

None.

If more space is needed use the Additional Comments page.

PREPARER:

The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER:

I feel that there is need, no need for further inquiry into this section of this environmental assessment.

or SUPERVISOR

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER:

The user feels that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	same fax number	

Questionnaire - Land Issues and Uses Section C (SC)

This section is for land issues and uses, on the subject property, only. All areas, present and past uses, as listed here (as well as others not mentioned) should be identified by completing a copy of this section for each individual environmental concern: UST's; AST's; disposal areas including septic tanks, ponds, pit and lagoons that are or were used for disposal; storage areas, mixing areas, maintenance areas.

If the subject property has many of these concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what is found and where located. When sub-divided, a drawing or map, showing and labeling each subdivision, shall be included in the appendices.

CERCLA Based Concerns:

- o Are there any: UST's N ; AST's N ; Disposal Areas N ; Septic Tanks N ; Ponds, Pits or Lagoons that are or ever were used for disposal N ; Storage Areas N ; Mixing Areas N ; Maintenance Areas N ; Landfills or Dumps N ; Stained or Discolored Soil N ; Areas lacking Vegetation and/or having Stressed Vegetation N ; Fill Dirt N ; Suspicious Mounds or Recesses N ; Are there any Transformers or Hydraulic Equipment that might indicate PCB's N ?
- o For yes answer(s):
- o Is the area within 100 feet of a drinking water well? N
Which area(s)?
- o Describe the area(s) in the comments portion of this section.
- o Has the subject property ever been used for dry cleaning,, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling or injection well(s)? N If yes, describe in comments portion.
- o Does surface or stormwater flow on to the subject property? N
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate.

Page SC 1 of 2

Comments:

None, except that the subject site and the adjacent property
to the south were served by an out-house at one time.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____ 10/07/94
printed name signature date

address

phone number fax number

REVIEWER: I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.
or
SUPERVISOR

_____ date
printed name signature

address

phone number fax number

USER: The user feels that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____ 10/07/94
printed name signature date

address

phone number same fax number

Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

4.7 acres, Across the way from the subject site,

Baseball/Softball Diamond

Undeveloped

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? N
If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N
If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property. N
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? N
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 1 of 6

Comments:

None.

If more space is needed use the Additional Comments page.

PREPARER:

The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is ~~no~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER:
or
SUPERVISOR

I feel that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER:

The user feels that there is need, no need for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	same fax number	

Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

Adjacent to the north of the subject site.

A grain storage facility. 3.1 acres

See photo eleven (11)

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? N
If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N
If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property. N
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? N
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 3 of 6

Comments:

None.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this section of this environmental assessment.

SUPERVISOR

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	same fax number	

Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

Adjacent to the south of the subject site.

A vehicle/motor repair shop. 2.7 acres

See photo twelve (12).

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? N
If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N
If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property. N
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? N
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 5 of 6

Comments:

At one time this site was served by an outhouse.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, ~~no need~~ for further inquiry into this or section of this environmental assessment.

SUPERVISOR

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	same fax number	

Questionnaire

Section E (SE)

GOVERNMENT RECORDS/HISTORICAL SOURCES INQUIRY

Do any of the following Federal government record systems list the Property or any property within the circumference of the area noted below:

- National Priorities List -- within 1.0 mile/1.6 Km? Yes No
- CERCLIS List -- within .5 mile/.8 Km? Yes No
- RCRA TSD Facilities -- within 1.0 mile/1.6Km? Yes No

Do any of the following State record systems list the property or any property within the circumference of the area noted below:

List maintained by State Environmental Agency of hazardous waste sites identified for investigation or remediation that is the State agency equivalent of NPL -- within approximately 1.0 mile/1.6 Km? Yes No

List maintained by State Environmental Agency of sites identified for investigation or remediation that is the state equivalent to CERCLIS -- within .5 mile/.8 Km? Yes No

Leaking Underground Storage Tank (LUST) List -- within .5 mile/.8 Km? Yes No

Solid Waste/Landfill Facilities -- within .5 mile/.8 Km? Yes No

Comments:

None.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER: I feel that there is need, no need for further inquiry into this or section of this environmental assessment.

SUPERVISOR

_____	_____	_____
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER: The user feels that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	<u>10/07/94</u>
printed name	signature	date

address		
_____	_____	
phone number	same fax number	

CASE STUDY #2
A PHASE ONE ESA

Information

User: Mr. R. Brown is the intended purchaser of the subject site, known as D.D.T. Chemical Distributors, Inc. D.D.T., Inc. is an active business that is located at 180 1st Ave., Good Town, AL, 40762, Telephone 205-444-5678.

Preparer: You, the student.

Assignment: The User needs an Environmental Site Assessment, in accordance with the ASTM Standard Practice or the equivalent, in order to meet one of the requirements for qualifying for the "innocent purchaser defense" of CERCLA and to determine if further appropriate inquiry or possible remediation is necessary. The user does not care as to the type of ESA report that is employed.

Description of Subject Site:

The legal description of the subject property is Lot A, Block B, located at 180 1st Ave., Good Town, AL 40762. The site is approximately 260' on all sides. The subject site and the adjoining properties are all level. As shown in photo #1 there is only one building on the subject site and it has a total area of 12,000 square feet. To the right of the overhead door in photo #1 is a 1,400 square foot residential area where the superintendent and his family reside for property security measures. The remainder of the building is used for storage, offices and shipping areas.

On the subject site there are a diesel fuel dispensing pump (photo 3), 55 gallon used drums (photo 4) and more 55 gallon used drums near the rear of the property (photo 5). The 55 gallon drums; according to the superintendent, a Mr. I. Donotknow; contained various hazardous chemicals. There is a 1,000 gallon UST for storing diesel fuel for use in the delivery trucks. DDT, Inc., does not manufacture chemicals on the site, but they do repackage both liquid and pellet size chemicals into smaller containers. The subject site, as well as all of the adjoining properties, is supplied with all utilities by the Necessary Utilities Cooperative.

Area Data:

1st Avenue and 2nd Street are not main thoroughfares but they are paved. There are no curbs or gutters for stormwater collection. The groundwater flows to the west, i.e. it flows from the light colored office building in the background of photo 7 towards the subject site. The site of the light colored office building was for 3 decades the site of a gasoline service station and a motor repair facility. The address of this adjoining site is 200 1st Avenue.

The adjoining property, located at the southeast corner of the intersection of 1st Avenue and 2nd Street, address 109 2nd Street, is shown in photos 6, 7 and 8. This facility is the location of a sheet metal fabrication enterprise. There are a degreasing operation and an outdoor painting operation both in the area of the blue 55 gallon drum in photo 7. Photo 8 shows the lack of "good housekeeping" on this adjoining site. The name of this enterprise is We Makeit, Inc.

The adjoining property, located at the southwest corner of the intersection of 1st Avenue and 2nd Street, address 110 2nd Street, is shown in photos 9, 10 and 11. This facility is the location of an Office Supply, Inc. business. On this adjoining site there are discarded 55 gallon drums (photo 10) and above ground storage tanks (photo 11). The past or present contents of the drums and the AST's, according to the present owner of the site, are unknown. The owner informs that they were there when the property was purchased. The owner refused to reply when asked what business(es) were previously on the site.

Questionnaires To Be Used:

The user agreed that the preparer use available questionnaires. These questionnaires have sections for: residential and non-residential structures, land uses, adjoining properties and government records/historical sources inquiry.



Location of Photo #5

Location of Photo #4

PHOTO 2
Main Building on subject Site Photo #1

Location of Photo #3

Site of an old gas station
The rear building in Photo #7 is now located on this site.

180 1st Ave.

200 1st Ave.

1st Ave.

Location of Photo #10

Adjoining Site Photo #9

Location of above ground tanks. Photo #11

110 2nd St.

2nd St.

Adjoining Site
Photos 6 and 7
Front view
location of Photo #8

109 2nd St.

REAR VIEW

A Non-Intrusive All Inclusive
ENVIRONMENTAL DUE DILIGENCE
SITE ASSESSMENT

For a Chemical Facility

**A Screen Process that Expands
into a Phase I Equivalent**

On

**180 1st Avenue
Good Town, AL 40762**

For

Mr. R. Brown

Date of Last Site Inspection 11/21/94 Report Issue Date 11/21/94

Signature of Preparer: _____ Date 11-22-94
Address: _____

Phone: _____

Signature of User: _____ Date 11-23-94
Address: _____

Phone: _____

Project No. 94PI234

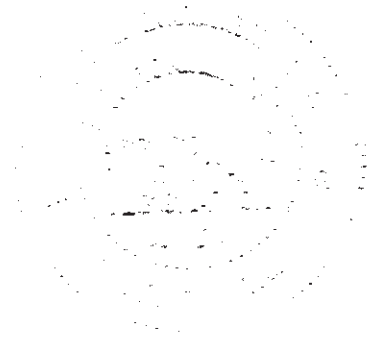


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Introduction

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Questionnaire

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Section B.	Non-Residential Structure(s)	<u>SB 1 - SB2</u>
Section C.	Land Issues and Site Visit	<u>SC 1 - SC2</u>
Section D.	Adjoining Properties	<u>SD 1 - SD6</u>
Section E.	Records Inquiry	<u>SE 1 - SE2</u>

Optional Appendices

Copy of Contract

Legal Maps, Photos

Regulatory Documentation

Interview Documentation

Preparer's Qualifications

PHASE ONE
ENVIRONMENTAL SITE ASSESSMENT

SUMMARY

The intent of this environmental site assessment was for the determination of recognized environmental conditions, readily apparent or suspected, on an 1.5± acre site at 180 1st Avenue, Good Town, AL 40762. This "all appropriate inquiry" assessment was conducted on November 18 thru November 21, 1994 on the authorization of the user, Mr. R. Brown.

The "need or no need" for further inquiry, based on the opinion of the preparer, is stated in the allocated area of each appropriate questionnaire.

INTRODUCTION

The purpose of this non-intrusive assessment report is to document the fact finding efforts that were used to determine the potential recognized environmental conditions related to the subject property and the adjoining properties. It is not necessarily intended or designed to fully comply with all applicable Federal and/or State environmental statutes, but rather is limited to the specific matters stated herein that make up the different questionnaires.

SITE DESCRIPTION

The 1.5± acre subject site is located at the northwest corner of the intersection of 1st Avenue and 2nd Street in Good Town, AL. The subject site, as well as the adjoining properties, is level and there appears to be no stormwater runoff problems. Most of the surrounding properties are undeveloped.

Questionnaire - Residential Structures - Section A (SA)

This section is for a residential structure and contents only. Complete a copy of this Section for each attached or detached residential unit (ie for each house, duplex, apartment or mobile home) on the subject property. Use Section C for all land inquiries.

Description of unit Residential, 1,400 square feet, Area

Year(s) of construction and major remodeling 1983

Has the structure ever been used for anything other than residential? Y

If yes, for what purpose? Part of structure used for commercial operations

CERCLA Based Concerns

- o Are there toxic materials, including pesticides or herbicides, stored in the structure indicating more than household use? N

Non-CERCLA Concerns

- o Is there any obviously suspect, friable, exposed asbestos? N
- o Does the EPA Map of Radon Zones for the county in which the subject property is located indicate a predicted annual average radon level greater than 4 pci/L? N
- o Has the subject structure been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? U
- o Has the radon level in a structure in the general location of the subject property been tested by a qualified professional and the annual average level determined to be greater than 4 pci/L? U

For the source of drinking water:

- o Is the subject structure served by a private well N, a non-public water system N, or a public water system Y?
- o If served by a private well or non-public water system, has the drinking water source been tested for contaminants, other than bacteria, and found to exceed the criteria of the appropriate regulatory agency? N/A List all contaminants that exceed their criteria in the comments for this structure in this section.
- o Regardless of the source of the drinking water, has a water sample, taken from inside the structure, been determined to contain lead in excess of 10 ug/L? U

ANSWER CODE: Y for yes, N for no, U for unknown, NA for not appropriate

Page SA 1 of 2

Comments:

No further investigation is required.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	11/22/94
printed name	signature	date

address		
_____	_____	
phone number	fax number	

REVIEWER: I feel that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

~~OF~~
SUPERVISOR

_____	_____	11/22/94
printed name	signature	date

address		
_____	_____	
phone number	fax number	

USER: The user feels that there is ~~need~~, no need for further inquiry into this section of this environmental assessment.

_____	_____	11/22/94
printed name	signature	date

address		
_____	_____	
phone number	same fax number	

Questionnaire - Non-Residential Structure(s) - Section B (SB)

This section is for non-residential structure and contents only. Complete a copy of this Section for each non-residential structure on the subject property, even if it is attached to a residential structure or consists of only a roof.

Use Section C for all land inquiries.

Size, Age, Description, Location and Purpose of this structure: _____

10,600 square feet, 11 years, 180 1st Avenue, Chemical Retail and Wholesale Sales

Present and past uses of this structure: _____

Chemical Sales 10,600 square feet;

Residential 1,400 square feet

CERCLA Based Concerns

o Are there any observed electrical or hydraulic equipment with labels indicating PCB's in the structure? N

o Are there any stained/discolored floors or walls in the structure? N
If yes, explain in the comments section for this structure.

o Are there any suspected hazardous substances stored in this structure? Y
If yes, list all suspected substances, the estimated amounts and the type of container for each:

This information requires further investigating.

(If needed continue in Comments on other side.)

Answer Code: Y for yes, N for no, U for unknown, and NA for not applicable

Comments:

Further investigation is required.

If more space is needed use the Additional Comments page.

PREPARER: The preparer has observed, inspected, and/or inquired into all of the areas and concerns that are contained in this section of this assessment. I feel that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____	_____	<u>11/22/94</u>
printed name	signature	date

address		
_____	_____	
phone number	fax number	

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~~of~~
~~SUPERVISOR~~

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phone number	same fax number	

Questionnaire - Land Issues and Uses Section C (SC)

This section is for land issues and uses, on the subject property, only. All areas, present and past uses, as listed here (as well as others not mentioned) should be identified by completing a copy of this section for each individual environmental concern: UST's; AST's; disposal areas including septic tanks, ponds, pit and lagoons that are or were used for disposal; storage areas, mixing areas, maintenance areas.

If the subject property has many of these concerns or is large in area, it is advisable to sub-divide into smaller parts (not necessarily equal parts) in order to describe what is found and where located. When sub-divided, a drawing or map, showing and labeling each subdivision, shall be included in the appendices.

CERCLA Based Concerns:

- o Are there any: UST's Y ; AST's N ; Disposal Areas Y ; Septic Tanks N ; Ponds, Pits or Lagoons that are or ever were used for disposal N ; Storage Areas Y ; Mixing Areas Y ; Maintenance Areas N ; Landfills or Dumps N ; Stained or Discolored Soil N ; Areas lacking Vegetation and/or having Stressed Vegetation N ; Fill Dirt N ; Suspicious Mounds or Recesses N ; Are there any Transformers or Hydraulic Equipment that might indicate PCB's N ?
- o For yes answer(s):
- o Is the area within 100 feet of a drinking water well? NA
Which area(s)?
- o Describe the area(s) in the comments portion of this section.
- o Has the subject property ever been used for dry cleaning,, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling or injection well(s)? N If yes, describe in comments portion.
- o Does surface or stormwater flow on to the subject property? N
If yes, describe in comments portion.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate.

Page SC 1 of 2

Comments:

Further investigation is required.

If more space is needed use the Additional Comments page.

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address

phone number same fax number

Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

Location: 200 1st Avenue, across 2nd Street to the west from

subject site. A metal building, approx. 8,000 square feet.

Now an office building. See comments for past uses.

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? Y

If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N

If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property.
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? N
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 1 of 6

Comments:

This site was a gasoline service station and motor repair facility
for three decades.

Further investigation is required.

If more space is needed use the Additional Comments page.

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printed name signature date

address

phone number fax number

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~~or~~
SUPERVISOR

_____ 11-22-94
printed name signature date

address

phone number fax number

USER: The user feels that there is need, ~~no need~~ for further inquiry into this section of this environmental assessment.

_____ 11/22/94
printed name signature date

address

phone number fax number

Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

Location: 109 2nd Street, Diagonally across the interesection from

subject site. A metal structure, approx. 15,000 square feet.

A sheet metal fabrication enterprise.

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? N
If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N
If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property.
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? N
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 3 of 6

Comments:

There are degreasing and painting operations in the outdoor areas of the site.

Other outdoor area shows the lack of "good housekeeping."

Further investigation is required.

If more space is needed use the Additional Comments page.

PREPARER:

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phone number fax number

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SUPERVISOR

printed name signature 11.22.94 date
address
phone number fax number

USER:

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printed name signature 11/22/94 date
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Questionnaire - Adjoining Properties - Section D (SD)

Complete a copy of this section for each property that adjoins the subject property. Adjoining Property's location, description, size:

Adjacent to the south of the subject site.

A vehicle/motor repair shop. 2.7 acres

See photo twelve (12).

Has the adjoining property ever been used for dry cleaning, commercial printing, junkyard, commercial photo developing, recycling facility, oil drilling, injection well(s), landfill? N

If yes, describe in comments portion.

Does surface or stormwater flow onto the subject property? N

If yes, describe in comments portion.

Describe in comments:

- o Any suspicious, potentially hazardous substance(s), operation(s), landfills, drums or disposal area(s) that are within approximately 1/8 mile (200m) of the subject property. N
- o Are any of these area(s) a potential source that should be investigated for environmental law/permit violations? N
If yes, describe in comments.

Answer code: Y for yes, N for no, U for unknown, NA for not appropriate

Page SD 5 of 6

Comments:

These are, contents unknown, discarded 55 gallon drums and aboveground storage tanks (ASTs).

Further investigation is required.

If more space is needed use the Additional Comments page.

PREPARER:

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REVIEWER:

I feel that there is need, ~~no need~~ for further inquiry into this or section of this environmental assessment.

SUPERVISOR

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phone number	fax number	

Questionnaire

Section E (SE)

GOVERNMENT RECORDS/HISTORICAL SOURCES INQUIRY

Do any of the following Federal government record systems list the Property or any property within the circumference of the area noted below:

- National Priorities List -- within 1.0 mile/1.6 Km? Yes No
- CERCLIS List -- within .5 mile/.8 Km? Yes No
- RCRA TSD Facilities -- within 1.0 mile/1.6Km? Yes No

Do any of the following State record systems list the property or any property within the circumference of the area noted below:

List maintained by State Environmental Agency of hazardous waste sites identified for investigation or remediation that is the State agency equivalent of NPL -- within approximately 1.0 mile/1.6 Km? Yes No

List maintained by State Environmental Agency of sites identified for investigation or remediation that is the state equivalent to CERCLIS - within .5 mile/.8 Km? Yes No

Leaking Underground Storage Tank (LUST) List -- within .5 mile/.8 Km? Yes No

Solid Waste/Landfill Facilities -- within .5 mile/.8 Km? Yes No

Comments:

No further investigation is required.

If more space is needed use the Additional Comments page.

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address
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PHOTOS

Photo

- 1 The only building on the subject site, containing residential, storage, offices and shipping areas.
- 2 Storage area is a rear corner of the subject site building.
- 3 A diesel fuel dispensing pump located outside near the rear corner of the subject site building.
- 4 Used 55 gallon drums located back of the subject site building.
- 5 Used 55 gallon drums located near the rear of the subject site.
- 6, 7 Front and rear views of the adjoining structure located at the southeast corner of the intersection of 1st Avenue and 2nd Street. The light colored building in the background of photo 7 is an office building.
- 8 Disposal area at the rear of the structure shown in photo 7.
- 9 Front and side view of the adjoining structure located at the southwest corner of the intersection of 1st Avenue and 2nd Street.
- 10, 11 Used 55 gallon drums and above ground storage tanks that are located to the rear of the structure shown in photo 9.

Agricultural Environmental Site Assessment Test

True/False

1. The presence of lead-based paint in a home is a significant hazard to young children.
2. Asbestos is “friable” if it crumbles when normal hand pressure is applied.
3. Increasing concern has arisen about the presence of chemicals in the environment and the threat they pose to people.
4. Contamination, fish kills and illnesses have not been attributed to exposure to hazardous materials.
5. Asbestos removal is often not a building owner’s best course of remedial action. In fact, improper removal can make the situation worse.
6. The purpose of an ESA does not include the identification of recognized environmental conditions.
7. ASTM rates standards for many products, material, systems and services.
8. Asbestos is a mined mineral fiber.
9. There is no truly “safe” level of radon.
10. Radon is not found in every state in the U.S.
11. The single most important factor influencing a chemical movement in water is its solubility.
12. It is not absolutely necessary that the user/owner be involved in all of the aspects of conducting all appropriate inquiry.
13. Cattle excrement storage is not a potential contamination problem.
14. The use of pesticides in poultry production does not contribute to possible soil contamination.
15. Heavy metals, such as lead and mercury can contribute to high toxicity and contamination.
16. For recognized environmental conditions, the use of the word “pesticides” can include herbicides, insecticides and fungicides.
17. The use of pesticides on a parcel of real estate over long periods of time, is not an important concern on the impact to ground water.
18. Radon does not damage lung tissue if it comes from water.
19. The historic use of mixing areas can contain significant quantities of contamination, even after many years.
20. Some of the residues that remain after the decomposition of the original compounds can be more toxic than the original compound.
21. Radon is a radioactive, colorless, odorless, naturally occurring gas that can be found practically everywhere.
22. Leaching is the process whereby liquids move through the soil.
23. Most chemicals break down or degrade over time.
24. An environmental risk assessment or site assessment only has to consider the subject site.
25. An important purpose of a pesticide container label is to instruct a pesticide user to apply the pesticide safely and properly.

Multiple Choice

-
-
26. An ESA can include which of the following environmental issues:
- (a) All of the following
 - (b) Radon
 - (c) Lead in paint and/or drinking water
 - (d) Asbestos
27. Petroleum contamination on an agricultural facility can be found at:
- (a) Underground storage tanks
 - (b) Vehicle maintenance areas
 - (c) At the pivot point of water irrigation systems
 - (d) All of the above
28. Which of the following does not contribute to soil contamination:
- (a) TCE
 - (b) H₂O
 - (c) PCE
 - (d) Petroleum products
29. Which of the following types of business may be responsible for property contamination:
- (a) Auto repair
 - (b) Gas service stations
 - (c) Dry cleaners
 - (d) All of the above
30. Which of the following does not contribute to contamination:
- (a) Turpentine manufacturing
 - (b) Rinsing of flower bulbs
 - (c) Sell clothing
 - (d) Wood treating
31. Pesticide contamination can be the result of:
- (a) Careless handling or storage
 - (b) Animal dipping vats
 - (c) Excess pesticide solutions/mixtures
 - (d) All of the above
32. Which of the following might contaminate an agricultural property:
- (a) All of the following
 - (b) Pesticides
 - (c) Heavy metals
 - (d) Volatile organics
33. Objectives of an agricultural site assessment are:
- (a) To put in writing good ESA practice
 - (b) To facilitate standardized ESA's
 - (c) To ensure that the standard of inquiry is practical
 - (d) All of the above
34. Which of the following is not considered a hazardous residential waste:

-
-
- (a)Waxes and polishes
(b)Banana peelings
(c)Motor oil
(d)Caustic cleaners
35. TCI, Trichloroethylene was a common chemical used in:
(a)Dry-cleaning
(b)Degreasing oily parts during manufacturing
(c)Cleaning auto parts
(d)All of the above
36. Heavy metals are:
(a)Metals that weigh more than 5 pounds
(b)Metals that are in a rock band
(c)Metals that do not cause contamination
(d)None of the above
37. Animal dipping vats(a trench, hole in the ground or tank) may have been used with:
(a)Kerosene
(b)Pesticides
(c)Diesel fuel
(d)All of the above
38. In some cases, information obtained during the site investigation may require additional investigation in order to:
(a)Satisfy the “all appropriate inquiry” requirement
(b)Satisfy the need of the user
(c)Clarify the need for further investigations
(d)All of the above
39. Chemical contamination from which of the following are an increasing environmental concern:
(a)Landfills
(b)Golf courses
(c)Land spreading of wastes
(d)All of the above
40. The purpose of an ESA are:
(a)To satisfy the requirements to qualify for the innocent landowner/purchaser defense
(b)To identify recognized environmental conditions
(c)To be used as a management tool
(d)All of the above



Membership Application

Professional Designations

- CEI
Certified Environmental Inspector
- CTS
Certified Testing Specialist
- CRS
Certified Remediation Specialist
- CES
Certified Environmental Specialist

MEMBERSHIP APPLICATION

Payment by check or credit card

- CEI - *Certified Environmental Inspector* \$225.00
- CTS - *Certified Testing Specialist* \$225.00
- CRS - *Certified Remediation Specialist* \$225.00
- CES - *Certified Environmental Specialist* \$225.00
- CEM- *Certified Environmental Manager* \$225.00

I do hereby apply for professional membership in the Environmental Assessment Association. I certify that all statements herein have been made honestly to the best of my knowledge and ability.

Signature _____
Date _____

Name _____
Title _____
Company _____
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Palm Springs, California 92263 USA Tel:
(877)743-6806 • Fax: (760)327-5631
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