

Materials
Testing
Consultants, INC.

**REPORT OF
PHASE I ENVIRONMENTAL SITE ASSESSMENT
1011 NORTH MISSION STREET
MOUNT PLEASANT, MICHIGAN**

Prepared For:

MICHIGAN DEPARTMENT OF MANAGEMENT AND BUDGET

Prepared By:

**MATERIALS TESTING CONSULTANTS, INC.
Grand Rapids, Michigan**

November 2006
MTC Project No. 061340

TABLE OF CONTENTS

Title	Page
1.0 EXECUTIVE SUMMARY	1
2.0 INTRODUCTION	2
2.1 Purpose	2
2.2 Detailed Scope-of-Services	2
2.3 Significant Assumptions	3
2.4 Limitations and Exceptions	3
2.5 Special Terms and Conditions	3
2.6 User Reliance	3
3.0 SITE DESCRIPTION	4
3.1 Location and Legal Description	4
3.2 Site and Vicinity General Characteristics	4
3.3 Current Use of Property	4
3.4 Descriptions of Structures, Roads, Other Improvements on the Site	4
3.5 Current Uses of Adjoining Properties	5
4.0 USER PROVIDED INFORMATION	5
4.1 Title Records	5
4.2 Environmental Liens of Activity and Use Limitations	5
4.3 Specialized Knowledge	5
4.4 Commonly Known or Reasonably Ascertainable Information	6
4.5 Valuation Reduction for Environmental Issues	6
4.6 Owner, Property Manager, and Occupant Information	6
4.7 Previous Reports	6
4.8 Reason for Performing Phase I ESA	8
5.0 RECORDS REVIEW	8
5.1 Standard Environmental Record Sources	9
5.1.1 <u>Federal Agency Database Review</u>	9
5.1.1.1 <u>National Priority List (NPL)</u>	9
5.1.1.2 <u>Proposed NPL List</u>	10
5.1.1.3 <u>Delisted NPL</u>	10
5.1.1.4 <u>NPL Recovery</u>	10
5.1.1.5 <u>CERCLIS</u>	10
5.1.1.6 <u>CERC-NFRAP</u>	10
5.1.1.7 <u>CORRACTS</u>	11
5.1.1.8 <u>RCRA TSD</u>	11
5.1.1.9 <u>RCRA Large Quantity Generator</u>	11
5.1.1.10 <u>RCRA Small Quantity Generator</u>	11
5.1.1.11 <u>ERNS</u>	12

TABLE OF CONTENTS (Continued)

Title	Page
5.1.1.12 <u>HMIRS</u>	12
5.1.1.13 <u>US Engineered Controls</u>	12
5.1.1.14 <u>US Institutional Control</u>	12
5.1.1.15 <u>DOD</u>	12
5.1.1.16 <u>FUDS</u>	13
5.1.1.17 <u>US Brownfields</u>	13
5.1.1.18 <u>Consent</u>	13
5.1.1.19 <u>ROD</u>	13
5.1.1.20 <u>UMTRA</u>	13
5.1.1.21 <u>ODI</u>	13
5.1.1.22 <u>Toxic Chemical Release Inventory System (TRIS)</u>	14
5.1.1.23 <u>TSCA</u>	14
5.1.1.24 <u>FITS</u>	14
5.1.1.25 <u>SSTS</u>	14
5.1.1.26 <u>Integrated Compliance Information System (ICIS)</u>	14
5.1.1.27 <u>PADS</u>	15
5.1.1.28 <u>MLTS</u>	15
5.1.1.29 <u>MINES</u>	15
5.1.1.30 <u>FINDS</u>	15
5.1.1.31 <u>RAATS</u>	15
5.1.2 <u>State Agency Database Review</u>	16
5.1.2.1 <u>State Hazardous Waste Sites (SHWS)</u>	16
5.1.2.2 <u>DEL SHWS</u>	16
5.1.2.3 <u>State Landfills</u>	16
5.1.2.4 <u>Historical Landfills</u>	17
5.1.2.5 <u>Michigan Leaking UST Database</u>	17
5.1.2.6 <u>UST Database</u>	18
5.1.2.7 <u>Michigan Aboveground Storage Tank (AST) Database</u>	18
5.1.2.8 <u>PEAS</u>	18
5.1.2.9 <u>AUL</u>	19
5.1.2.10 <u>Drycleaners</u>	19
5.1.2.11 <u>Brownfields</u>	19
5.1.2.12 <u>National Pollutant Discharge Elimination System (NPDES)</u>	19
5.1.2.13 <u>Permits and Emission Inventory Data (AIRS)</u>	19
5.1.2.14 <u>Baseline Environmental Assessment (BEA)</u>	20
5.1.3 <u>Tribal Database Review</u>	21
5.1.3.1 <u>Indian Reservations</u>	21
5.1.3.2 <u>Indian LUST Database</u>	21
5.1.3.3 <u>Indian UST Database</u>	21
5.1.4 <u>EDR Proprietary Database Review</u>	22
5.1.4.1 <u>Manufactured Gas Plants</u>	22

TABLE OF CONTENTS (Continued)

Title	Page
5.2 Additional Environmental Record Sources	22
5.2.1 <u>Local Regulatory Agencies</u>	22
5.3 Physical Setting Source(s)	22
5.3.1 <u>Regional Physiography</u>	23
5.3.2 <u>Groundwater Conditions</u>	23
5.3.3 <u>Soil and Rock Conditions</u>	23
5.4 Historical Use Information on the Property	23
5.4.1 <u>Interview With Property Owner</u>	24
5.4.2 <u>Aerial Photograph Review</u>	24
5.4.3 <u>City Directory Review</u>	25
5.4.4 <u>Fire Insurance Map Review</u>	25
5.5 Historical Use Information on Adjoining Properties	26
6.0 SITE RECONNAISSANCE	27
6.1 Methodology and Limiting Conditions	27
6.2 General Site Setting	27
6.3 Exterior Observations	27
6.3.1 <u>Underground Storage Tanks (USTs)</u>	28
6.3.2 <u>Aboveground Storage Tanks (ASTs)</u>	28
6.3.3 <u>Hazardous Substances or Petroleum Products Use</u>	28
6.3.4 <u>Electrical Transformers/Equipment</u>	28
6.3.5 <u>Dry Wells and Sumps</u>	28
6.3.6 <u>Pits, Ponds, and Lagoons</u>	28
6.3.7 <u>Wells</u>	29
6.3.8 <u>Solid Waste</u>	29
6.3.9 <u>Septic System</u>	29
6.3.10 <u>Stressed Vegetation</u>	29
6.3.11 <u>Soil/Water Sampling</u>	29
6.3.12 <u>Oil/Water Separators</u>	29
6.3.13 <u>Surface Water Runoff</u>	30
6.3.14 <u>Other Observations</u>	30
6.4 Interior Observations	30
6.4.1 <u>Stains or Corrosion</u>	30
6.4.2 <u>Floor Drains</u>	30
6.4.3 <u>Potential Asbestos/Lead-Containing Materials</u>	30
6.4.4 <u>Maintenance Areas</u>	31
6.4.5 <u>Electrical Transformers/Equipment</u>	31
6.4.6 <u>Hazardous Wastes Generated and Waste Storage Areas</u>	31
6.4.7 <u>Aboveground Storage Tanks (ASTs)</u>	31
7.0 INTERVIEWS	31
7.1 Interview with Site Owner	31
7.2 Interview with Site Manager	32

TABLE OF CONTENTS (Continued)

Title	Page
7.3 Interview with Site Occupants	32
7.4 Interview with Local Government Officials	32
7.5 Interviews with Others	32
8.0 FINDINGS	32
9.0 OPINION	33
9.1 Floor Drains in Basement of Structure	33
9.2 Open LUST Status of subject Site	33
9.3 Previous Reports indicating Migration of Contaminated Groundwater On to the subject Site	33
10.0 CONCLUSIONS	33
11.0 DEVIATIONS	34
12.0 ADDITIONAL SERVICES	34
13.0 REFERENCES	35
14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS	36
15.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS	37
APPENDICES	
A Limitations for Phase I Environmental Site Assessments	
B Site Location Map	
C Site Plan	
D Legal Description and Property Information	
E Zoning Map	
F Previous Reports	
G Environmental Database Search Results	
H Interview Documentation	
I Aerial Photographs	
J City Directory Abstracts	
K Fire Insurance Maps	
L Site Photographs	

1.0 EXECUTIVE SUMMARY

In November 2006, Materials Testing Consultants, Inc. (MTC) completed a Phase I Environmental Site Assessment (ESA) for a 0.3-acre property (more or less) located at 1011 North Mission Street, Mount Pleasant, Michigan. The Phase I ESA was completed for The State of Michigan. The current Owner of the parcel is the State of Michigan. The tax identification number for the parcel is 17-000-15-174-00. This assessment was performed in substantial compliance with ASTM Practice Designation E1527-05: *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*.

The purpose of the Phase I ESA was to identify the presence or absence of Recognized Environmental Conditions (RECs) and suspect environmental conditions associated with the subject Site. RECs are defined by ASTM E1527-05 as 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 the 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.

In order to achieve this objective, the assessment included a reconnaissance visit to the Site, a review of the Site history, a limited review of adjacent properties, a review of selected local, state and federal regulatory records, interviews with persons and agencies familiar with the Site, and preparation of this Report. MTC acknowledges our Client's reliance upon the findings and conclusion presented within this Report. MTC's findings from which this conclusion was derived are summarized below:

- Data requests and interviews with the Owner identified no evidence of suspect environmental conditions and one REC (open LUST status of subject Site) through user-supplied information or specialized knowledge of the subject Site.
- Review of federal, state and local regulatory agency databases did not identify evidence of suspect environmental conditions and identified two RECs (open LUST status of subject Site and migration of contaminants from off-site sources) on the subject Site or adjacent properties.
- Reconnaissance by MTC personnel on the exterior of the Site did not identify evidence of suspect environmental conditions and identified evidence of one REC (open LUST status) on the subject Site and no evidence of RECs on adjacent properties.
- Reconnaissance by MTC personnel on the interior of Site structures identified evidence of one suspect environmental condition (floor drains in basement) and evidence of one REC (open LUST status).
- Review of reasonably ascertainable historical information including common knowledge, previous reports, aerial photographs, topographic maps, and city directories did not identify evidence of suspect environmental conditions evidence of one REC (open LUST status) on the subject Site and one REC on adjacent properties (migration of contaminants from off-site sources).

1011 North Mission Street

Project No. 061340

November 27, 2006

Page 2

- Interviews and information requests with local regulatory agencies did not identify evidence of suspect environmental conditions and/or RECs on the subject Site or adjacent properties.

In the opinion of MTC, this assessment identified evidence of one suspect environmental condition (floor drains in basement) and identified evidence of two RECs (open LUST status and migration of contaminants from offsite sources) with regard to the subject Site. Monitoring well abandonment and soil and groundwater sampling with laboratory analyses is needed to evaluate the identified conditions. An asbestos survey is needed to evaluate construction materials for the presence of asbestos.

2.0 INTRODUCTION

2.1 Purpose

The purpose of the Phase I ESA was to identify the presence or absence of suspect environmental conditions and/or RECs associated with the subject Site.

2.2 Detailed Scope-of-Services

MTC's assessment of the subject Site was completed in substantial compliance with ASTM E1527-05. MTC's scope of services consisted of the following activities:

- Interviews with the property owner regarding the current and past Site usage and Site operations;
- Review of federal and state regulatory agency databases identified by ASTM for the subject Site and a selected radius around the subject Site;
- Review of previous environmental reports on the subject Site;
- Review of the Site history through available ASTM Standard Historical Sources;
- Interior and exterior Site reconnaissance to identify evidence of RECs;
- Vicinity reconnaissance of properties within search radii specified by ASTM E1527-05 with limited review of adjoining properties to identify evidence of RECs;
- Contact with local environmental regulatory agencies to inquire about past and present environmental conditions at the subject Site and in its vicinity;
- Preparation of this Report.

2.3 Significant Assumptions

MTC assumes that database records obtained and statements provided by persons interviewed for this Phase I ESA are accurate and complete.

2.4 Limitations and Exceptions

MTC's Environmental Site Assessment was performed in accordance with customary and generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area. MTC observed the degree of care and skill generally exercised by other consultants under similar circumstances and conditions. MTC's findings and conclusions must be considered not as scientific certainties but rather as our professional opinion concerning the significance of the limited data gathered during the course of the Environmental Site Assessment. No other warranty, expressed or implied, is made. Specifically, MTC does not and cannot represent that the subject Site contains no hazardous material, petroleum products or other latent condition beyond that observed by MTC during its Site Assessment. This Report was prepared in accordance with generally accepted environmental practices, and is subject to the limitations contained in Appendix A.

It should be noted that when an assessment is completed without subsurface explorations and chemical screening of soil and groundwater beneath the Site, no data is generated regarding latent subsurface conditions that may be the result of on-site or off-site sources.

2.5 Special Terms and Conditions

MTC acknowledges Client's reliance upon the findings and conclusions presented in this Report. The Report is subject to modification if MTC or any other party develops subsequent information.

2.6 User Reliance

This Phase I ESA Report was prepared on behalf of and for the exclusive use of the State of Michigan (Client). The information in this Report is solely for use in an environmental assessment of the subject Site and may not be used or relied upon by any other party without written consent of MTC. The scope of services performed in this evaluation may not be appropriate to satisfy the needs of other users and use or re-use of this document or the findings, conclusions, or recommendations is at the risk of said user.

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The subject property consists of a 0.3-acre parcel (more or less) located in the SE ¼ of the SW ¼ of Section 10, Town 14 North, Range 4 West, Mount Pleasant Quadrangle, Isabella County, Michigan as shown in Appendix B. The parcel is referred to as the “subject Site” throughout this Report and is commonly referred to as 1011 North Mission Street, Mount Pleasant, Michigan. The parcel number for the subject Site is 17-000-15-174-00. The Site Plan is included as Appendix C. The legal description as provided to MTC is included as Appendix D.

3.2 Site and Vicinity General Characteristics

The subject Site and surrounding area is developed for commercial use. According to the City of Mount Pleasant, the subject Site and adjacent properties located to the north, east and south are zoned Central Business District (C-2). The property located to the west is zoned Industrial District (I-1). A copy of the copyrighted Zoning Map was not available for this report as indicated in Appendix E.

3.3 Current Use of Property

The subject Site has been vacant since 1998 when the Mount Pleasant State Police Post was moved to a new facility. Utilities are currently turned off. Exterior landscaping and lawn areas are maintained.

3.4 Descriptions of Structures, Roads, Other Improvements on the Site

Over 60-percent of the subject Site is occupied by permanent structures and/or paved surfaces. The building footprint occupies approximately 1,900-square feet. The building is a two story brick structure. The roof is shingled. An unfinished basement contains the gas fired boiler. The building is not currently heated. Two small outbuildings are located on the north side of the structure. One is used for storage; the other was formerly used to house a groundwater treatment system.

Paved parking areas are located west and south of the structure. Landscaped areas are located to the east and west of the structure.

3.5 Current Uses of Adjoining Properties

According to the City of Mount Pleasant, the subject Site and adjacent properties are zoned Central Business District (C-2). Observations of adjacent properties conducted from the subject Site and public right-of-way did not reveal evidence of the use of hazardous materials or petroleum products that could represent a REC with respect to the subject Site.

The subject Site is bounded to the west by a United Parcel Service (UPS) distribution center, to the north by a driveway and Southeast Brake beyond, to the east by North Mission Street and commercial businesses (Dollar Daze) beyond, and to the south by Hazer Hardware. A Site Plan is provided in Appendix C. The legal description and survey are included in Appendix D.

4.0 USER PROVIDED INFORMATION

4.1 Title Records

A title search was not completed for this Phase I ESA. The State ownership of the parcel dates back to 1935 as listed on the deed. This is believed to represent the first developed use of the subject Site. Additional title information is included with the legal description and survey contained in Appendix D.

4.2 Environmental Liens of Activity and Use Limitations

A search for environmental liens was not completed for this Phase I ESA.

4.3 Specialized Knowledge

Several agencies of the State of Michigan are aware of the release from a UST system at the subject Site and subsequent cleanup activities and closure. These agencies include the Michigan State Police, Michigan Department of Management and Budget and Michigan Department of Environmental Quality.

1011 North Mission Street

Project No. 061340

November 27, 2006

Page 6

4.4 Commonly Known or Reasonable Ascertainable Information

Common knowledge includes the open LUST status on the subject Site and the potential presence of groundwater contamination from several known sites of contamination in the vicinity of the subject Site.

4.5 Valuation Reduction for Environmental Issues

There are no known value reductions due to environmental issues that indicate knowledge of an environmental condition.

4.6 Owner, Property Manager, and Occupant Information

On September 28, 2006, MTC conducted the site visit and interview with First Lieutenant Christopher Stolicker, Post Commander for the Mount Pleasant State Police. The subject Site is currently owned by the State of Michigan. Information regarding the interview is contained in Section 7.2.

4.7 Previous Reports

The following previous reports were identified for the subject Site.

- 20-Day Initial Abatement Report, Testing Engineers and Consultants (TEC)
- 45-Day Characterization Report and Work Plan, TEC
- Specification of Construction, Groundwater Remediation System, SEG, August 1995
- Remedial Investigation/Feasibility Study and Corrective Action Work Plan, SEG, September 1995
- Final Assessment Report, SEG, October 1996
- 1999 Annual Performance Evaluation of Groundwater Remediation System, SEG, March 2000
- 2000 Annual Performance Evaluation of Groundwater Remediation System, DLZ, March 2001
- 1996-2001 Annual Performance Evaluation of Groundwater Remediation System, DLZ, February 2002
- Draft Supplemental Site Investigation Report, DLZ, July 2002
- Draft Remedial Investigation/Soil Delineation Report, DLZ, December 2002
- Project Summary Report, DLZ, August 2004

1011 North Mission Street

Project No. 061340

November 27, 2006

Page 7

The Project Summary Report issued by DLZ in August 2004 provided a general summary of the site history with respect to the underground storage tank release discovered June, 16, 1992. A general summary of DLZ's report is provided in this section. The entire report is included in Appendix F.

Two 6,000-gallon USTs were removed and a confirmed release was reported on June 17, 1992 (the release date indicated is inconsistent with MDEQ file information). The release appeared to be associated with the piping run and the quantity of the release was unknown. Free product was not encountered. Approximately 150-cubic yards of contaminated soil were excavated at the time of tank removal.

In 1995, DLZ completed a Remedial Investigation and Feasibility Study to assess the extent of contamination and evaluate groundwater remediation options. The reports indicated groundwater contamination exceeding MDEQ cleanup criteria and soil contamination in the capillary fringe from 8- to 10-feet below ground surface. The recommended treatment alternative was groundwater extraction with air stripping and vapor extraction. Treated groundwater was amended with nutrients and re-injected through an infiltration gallery. The treatment system operated from September 9, 1996 to November 12, 1996 when it was shut down to address iron fouling issues. The system was re-started in March 1998 and operated to May 1999 when it was shut down due to insufficient funding. The system was re-started in March 2000 to January 2001. The system operated intermittently from January 2001 to October 2001 due to repairs and leakage and failure of the infiltration gallery. When the system was shut down in October 2001, a total of 5,081,566-gallons of groundwater was treated.

Laboratory results from groundwater samples collected from site monitoring wells in October 2001 at the time of system shut down were below applicable MDEQ cleanup criteria.

In the spring of 2002, DLZ conducted a supplemental site investigation to determine if contamination had migrated off-site. The results indicated that contamination was present off-site to the west on the UPS property and across the UPS driveway to the north.

In the winter of 2002 DLZ conducted a Remedial Investigation/Soil Delineation to determine the extent of impacted soil remaining above the water table. DLZ concluded the quantity of impacted soil to be "minimal". Groundwater within the former UST basin and to the north and east was impacted by BTEX and MTBE (within the basin and to the north only). DLZ indicated that MTBE was not detected during previous investigations and evaluated the possibility that another plume was impacting the site. Information

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 8

obtained from review of MDEQ files indicated that a contaminant plume had migrated north from the Total Petroleum (TPI) property towards the subject Site and had impacted several monitoring wells between the two properties with BTEX and MTBE.

DLZ conducted additional investigation to determine if the TPI plume was impacting the subject Site. DLZ concluded that groundwater contamination was migrating from the TPI site to the subject Site. TPI's consultant indicated that the plume may be co-mingled with a plume originating from a service station formerly located on the J.W. Filmore property.

With regard to the subject Site, DLZ indicated that upgrading and operating the treatment system was not a cost effective alternative for treating residual contamination attributable to the Mount Pleasant State Police Post Site (subject Site) and recommended natural attenuation and deed restrictions for closing the site. The current release status of the subject Site is "open". This identifies a REC.

The identification of impact to the subject Site from the TPI Site and the former service station located on the J.W. Filmore property also identifies a REC (migration from off-site sources).

4.8 Reason for Performing Phase I ESA

This Phase I ESA was performed for the contemplated future transfer of the property.

5.0 RECORDS REVIEW

The following section is based on reasonably ascertainable public information from various federal, state, and local agencies that maintain environmental regulatory databases. These databases provide information regarding the regulatory status of a property and incidents involving use, storage, spilling or transportation of oil or hazardous materials. Information was gathered by MTC personnel and by a professional data search service, Environmental Data Resources (EDR) of Milford, Connecticut. Thirty-one federal regulatory, fourteen state regulatory, three tribal and one proprietary database searches were performed for the subject Site. EDR expands its database search by an additional one-half mile radius beyond those required under ASTM standards. Federal, state and local regulatory information is presented in Appendix G. A discussion of the reviewed information is presented in the following sections.

5.1 Standard Environmental Record Sources

5.1.1 Federal Agency Database Review

Thirty-one federal databases were provided by EDR for the subject Site and vicinity and reviewed by MTC. Abbreviations and detailed information regarding the database search are contained in Appendix G.

<u>Database</u>	<u>(Radius Searched Miles)</u>
• NPL	1.0
• Proposed NPL	1.0
• Delisted NPL	1.0
• NPL RECOVERY	TP
• CERCLIS	0.5
• CERC-NFRAP	0.5
• CORRACTS	1.0
• RCRA TSD	0.5
• RCRA Lg. Quan. Gen.	0.25
• RCRA Sm. Quan. Gen.	0.25
• ERNS	TP
• HMIRS	TP
• US ENG CONTROLS	0.5
• US INST CONTROL	0.5
• DOD	1.0
• FUDS	1.0
• US BROWNFIELDS	0.5
• CONSENT	1.0
• ROD	1.0
• UMTRA	0.5
• ODI	0.5
• TRIS	TP
• TSCA	TP
• FTTS	TP
• SSTS	TP
• ICIS	TP
• PADS	TP
• MLTS	0.25
• MINES	0.25
• FINDS	TP
• RAATS	TP

TP = Target Property only

5.1.1.1 National Priority List (NPL)

The National Priority List (NPL) is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites were not listed within a 1.0-mile radius of the subject Site.

5.1.1.2 Proposed NPL List

The Proposed National Priority List is a subset of CERCLIS and identifies potential sites for priority cleanup under the Superfund Program. Proposed NPL sites were not listed within a 1.0-mile radius of the subject Site.

5.1.1.3 Delisted NPL

The National Oil and Hazardous Substance Pollution Contingency Plan (NCP) established criteria used by EPA to delete sites from the NPL. In accordance with 40CFR 300.425(e), sites may be deleted from NPL where no further action is appropriate. Delisted NPL sites were not identified within a 1.0-mile radius of the subject Site.

5.1.1.4 NPL Recovery

Under the authority granted the EPA by CERCLA of 1980, the EPA has the authority to file liens against real property in order to recover remedial action expenditures. NPL RECOVERY sites were not identified within a 1.0-mile radius of the subject Site.

5.1.1.5 CERCLIS

CERCLIS contains data on potential hazardous waste sites reported to the USEPA pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) by states, municipalities, private companies and private persons. CERCLIS sites were not listed within a 0.5-mile radius of the subject Site.

5.1.1.6 CERC-NFRAP

CERC-NFRAP contains data on potential hazardous waste sites reported to the USEPA pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) by states, municipalities, private companies and private persons where no additional remediation activities are planned. One CERC-NFRAP site was listed within a 0.5-mile radius of the subject Site. The Dana Corporation site located at 801 East Division is north of the subject Site

and hydraulically downgradient. It is not identified as a REC with regard to the subject Site.

5.1.1.7 CORRACTS

CORRACTS contains data on potential hazardous waste sites reported to the USEPA pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) by states, municipalities, private companies and private persons where a report of corrective action has been issued. CORRACTS sites were not listed within a 1.0-mile radius of the subject Site.

5.1.1.8 RCRA TSD

RCRA TSD includes information on sites that treat, store, or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). RCRA TSD sites were not listed within a 0.5-mile radius of the subject Site.

5.1.1.9 RCRA Large Quantity Generator

The RCRA Large Quantity Generator database identifies facilities that generate large amounts of hazardous waste as defined by RCRA. Large quantity RCRA hazardous waste generators were not identified within a 0.25-mile radius of the subject Site.

5.1.1.10 RCRA Small Quantity Generator

The Resource Conservation and Recovery Act (RCRA) Small Quantity Generator database identifies facilities that generate small amounts of hazardous waste as defined by RCRA. Six small quantity generators (SQGs) were listed within 0.25-mile radius of the subject Site. The identified SQGs are not located adjacent to the subject Site and are not identified a RECs with regard to the subject Site based on their RCRA generator status due to distance and the use of small quantities of hazardous materials. The SQG sites are identified in the environmental database report provided in Appendix G.

5.1.1.11 ERNS

Emergency Response Notification System (ERNS) records information on reported releases of oil and hazardous substances. The search included the subject Site only. The subject Site was not identified on the ERNS database.

5.1.1.12 HMIRS

The Hazardous Materials Information Reporting System (HMIRS) contains information on hazardous material spill incidents reported to DOT. The search included the subject Site only. The subject Site was not identified on the HMIRS database.

5.1.1.13 US Engineering Controls

The US ENG CONTROLS database is a listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health. US ENGINEERING CONTROLS sites were not listed within a 0.5-mile radius of the subject Site.

5.1.1.14 US Institutional Controls

The US INST CONTROL database is a listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls. US INST CONTROL sites were not listed within a 0.5-mile radius of the subject Site.

5.1.1.15 DOD

The Department of Defense (DOD) data set consists of federally owned or administered lands, administered by the DOD, that have an area equal to or greater than 640 acres. DOD sites were not listed within a 1.0-mile radius of the subject Site.

5.1.1.16 FUDS

The Formerly Used Defense Sites (FUDS) listing includes properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions. FUDS sites were not listed within a 1.0-mile radius of the subject Site.

5.1.1.17 US Brownfields

The US BROWNFIELDS database provides a listing of brownfield sites within the United States. A brownfield is defined as an abandoned or under-utilized property where redevelopment is complicated by either real or perceived hazardous substance contamination. US BROWNFIELDS sites were not listed within a 0.5-mile radius of the subject Site.

5.1.1.18 CONSENT

The CONSENT database tracks major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. CONSENT sites were not listed within a 1.0-mile radius of the subject Site.

5.1.1.19 ROD

The Record of Decision (ROD) database lists sites with a ROD. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup. ROD sites were not listed within a 1.0-mile radius of the subject Site.

5.1.1.20 UMTRA

The UMTRA database provides a listing of sites that contain uranium mill tailings. UMTRA sites were not listed within a 0.5-mile radius of the subject Site.

5.1.1.21 Open Dump Inventory (ODI)

The ODI lists disposal facilities that do not comply with one or more of the criteria set forth in 40 CFR Part 257 or Part 258 Subtitle D Criteria. ODI sites were not listed within a 0.5-mile radius of the subject Site.

5.1.1.22 Toxic Chemical Release Inventory System (TRIS)

Toxic Release Inventory System (TRIS) identifies facilities that release toxic chemical to the air, water, and land in reportable quantities under SARA Title III Section 313. The search included the subject Site only. The subject Site was not identified on the TRIS database.

5.1.1.23 Toxic Substance Control Act (TSCA)

The Toxic Substance Control Act (TSCA) database identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. The search included the subject Site only. The subject Site was not identified on the TSCA database.

5.1.1.24 Federal Insecticide, Fungicide & Rodenticide Act (FTTS)

The FTTS database tracks administrative cases and pesticide enforcement actions and compliance activities related to the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and TSCA. The search included the subject Site only. The subject Site was not identified on the FTTS database.

5.1.1.25 SSTS

FIFRA Section 7 requires all registered pesticide-producing establishments to submit an annual report to the EPA regarding the types and amounts of pesticides produced. The Section Seven Tracking System (SSTS) is the repository for the data. The search included the subject Site only. The subject Site was not identified on the SSTS database.

5.1.1.26 Integrated Compliance Information System (ICIS)

The ICIS supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program. The search included the subject Site only. The subject Site was not identified on the ICIS database.

5.1.1.27 PADS

The PCB Activity Database System (PADS) identifies generators, transporters, commercial storers and/or brokers and disposers of PCBs. The search included the subject Site only. The subject Site was not identified on the PADS database.

5.1.1.28 MLTS

The Material Licensing Tracking System (MLTS) contains a list of sites that possess or use radioactive materials. The search included the subject Site only. The subject Site was not identified on the MLTS database.

5.1.1.29 MINES

The MINES database contains identification and violation information for mines active or opened since 1971. MINES sites were not identified within a 0.25-mile radius of the subject Site.

5.1.1.30 FINDS

The Facility Index System (FINDS) contains the EPA index of identification numbers associated with a property or facility that the EPA has investigated or has been made aware of in conjunction with various regulatory programs. The search included the subject Site only. The subject Site was not identified on the FINDS database.

5.1.1.31 RAATS

RCRA Administrative Action Tracking System (RAATS) contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. Data entry in the RAATS database was terminated in September 1995 though a copy of the database is retained for historical records. The search included the subject Site only. The subject Site was not identified on the RAATS database.

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 16

5.1.2 State Agency Database Review

MTC reviewed the following state and local databases provided by EDR for facilities cited within the specified search radii:

<u>Database</u>	<u>Radius Searched (Miles)</u>
• State Haz. Waste	1.0
• DEL SHWS	1.0
• State Landfill	0.5
• HIST LF	0.5
• LUST	0.5
• UST	0.25
• AST	0.25
• PEAS	TP
• AUL	0.5
• DRYCLEANERS	0.25
• BROWNFIELDS	0.5
• NPDES	TP
• AIRS	TP
• BEA	0.5

TP=Target Property Only

5.1.2.1 State Hazardous Waste Sites (SHWS)

State hazardous waste site (SHWS) records are the equivalent to the Federal CERCLIS. Priority sites planned for cleanup using state funds are identified as well as those sites where potentially responsible parties will pay cleanup costs. Four SHWS sites were listed within a 1.0-mile radius of the subject Site. None of the SHWS sites are located hydraulically upgradient from the subject Site and are not identified as a RECs with regard to the subject Site due to location and distance.

5.1.2.2 DEL SHWS

The DEL SHWS database contains sites that have been delisted from the list of contaminated sites as found in the State Hazardous Waste database. DEL SHWS sites were not listed within a 1.0-mile radius of the subject Site.

5.1.2.3 Solid Waste Facilities Database

Solid Waste Facilities/Landfill records contain an inventory of solid waste disposal facilities or landfills. Information may contain active or inactive facilities and open dumps that failed to meet RCRA Subtitle D Section

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 17

4004 criteria for solid waste landfills or disposal sites. State Landfill sites were not listed within a 0.5-mile radius of the subject Site.

5.1.2.4 Historical Landfills

The Michigan HIST LF database contains information on inactive solid waste facilities. The database contains historical information and is no longer updated. HIST LF sites were not listed within 0.5-mile of the subject Site.

5.1.2.5 Michigan Leaking UST Database

The Michigan Leaking Underground Storage Tank Incident Reports (LUST) database identifies reported active and inactive leaking underground storage tank incidents in the state of Michigan. Eight known LUST sites were identified by EDR within a 0.5-mile radius of the subject Site. The two LUST sites identified by previous reports as having impacted the subject Site were not identified by the search (former TPI and the J.W. Filmore property). The environmental database report is provided in Appendix G. The subject Site and adjacent property were reviewed in detail and are discussed below:

Former Total Petroleum Service Station (former TPI)
815 North Mission Street
Mt. Pleasant, MI

This site is located approximately 400-feet south of the subject Site and is identified as a REC due to previous reports indicating that groundwater contamination from this site has impacted the subject Site. Additional discussion is provided in Section 4.7 and Appendix F.

J.W. Filmore property (former Service Station)
903 North Mission Street
Mt. Pleasant, Michigan

This site was a former service station from approximately 1927 to 1963 and is located approximately 400-feet south of the subject Site. No reports of a release from an underground storage tank are available for this site. Previous reports indicate that the consultant for TPI indicated that contamination from this site had commingled with the TPI contamination

and migrated to the subject Site. Based on this information, this site is identified as a REC with regard to the subject Site. Additional discussion is provided in Section 4.7 and Appendix F.

The remaining sites identified in the environmental database report are not identified as RECs due to distance and location from the subject Site.

5.1.2.6 UST Database

The Michigan Underground Storage Tank (UST) Database identifies registered active and inactive underground storage tanks in the State of Michigan. Ten known UST sites were identified within a 0.25-mile radius of the subject Site. The identified sites are listed in the environmental database report provided in Appendix G. The location of each site was reviewed and FOIAs were submitted for sites located at elevations above the subject Site if the locations were considered to have potential to contribute contaminants to the subject Site. File information from one UST site that had the potential to represent an environmental threat to the subject Site was reviewed and is summarized below:

Olson Tire Service
704 East Pickard
Mt. Pleasant, MI

This site is the former TPI site with a previous address of 815 N. Mission Street that was identified as a REC with regard to the subject Site. Additional discussion is provided in Section 4.7 and Appendix F.

5.1.2.7 Michigan Aboveground Storage Tank (AST) Database

The Michigan Aboveground Storage Tank (AST) Database identifies registered active and inactive aboveground storage tanks in the State of Michigan. Three AST sites were identified within a 0.25-mile radius of the subject Site. None of the AST sites were identified as a REC with regard to the subject site based on the location and distance.

5.1.2.8 PEAS

The Pollution Emergency Alerting System (PEAS) records environmental pollution emergencies that were reported to the Michigan Department of Environmental Quality. Types of emergencies recorded include tanker

accidents, pipeline breaks, and release of reportable quantities of hazardous substances. The search included the subject Site only. The subject Site was not identified on the PEAS database.

5.1.2.9 AUL

The Michigan AUL database contains sites within Michigan that have institutional and/or engineering controls in place. Two AUL sites were identified within 0.5-mile of the subject Site. The identified AUL sites were not considered to represent RECs with regard to the subject Site based on location and distance.

5.1.2.10 Drycleaners

The Michigan DRYCLEANERS database provides a listing of dry cleaning facilities in Michigan. DRYCLEANERS sites were not listed within 0.25-mile of the subject Site.

5.1.2.11 Brownfields

The BROWNFIELDS database lists all state funded Act 451 of 1994 Part 201 and 213 sites, as well as, LUST sites that have been redeveloped by private entities using the Baseline Environmental Assessment process. This listing does not include all potential brownfield sites in Michigan. BROWNFIELDS sites were not listed within 0.5-mile of the subject Site.

5.1.2.12 National Pollutant Discharge Elimination System (NPDES)

The NPDES inventory provides a list of all pollutant discharge and stormwater permits. The search included the subject Site only. The subject Site was not identified on the NPDES database.

5.1.2.13 Permits and Emission Inventory Data (AIRS)

The AIRS inventory provides a list of permit and emissions inventory data. The search included the subject Site only. The subject Site was not identified on the AIRS database.

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 20

5.1.2.14 Baseline Environmental Assessment (BEA)

The Baseline Environmental Assessment (BEA) database lists all sites within the state of Michigan that have had a BEA. A BEA is an evaluation of environmental conditions that exist at a facility at the time of purchase. The BEA reasonably defines the existing conditions and circumstances at the facility so that in the event of a subsequent release, there is a means of distinguishing the new release from existing contamination. Six BEAs were identified within a 0.5 mile radius of the subject Site. MTC evaluated the locations of the BEAs. Based on location and distance with regard to the subject Site, five BEAs were not considered to represent RECs. MTC completed a review of the following BEA:

Former Total Petroleum Service Station (former TPI)
815 North Mission Street
Mt. Pleasant, Michigan

This site is located approximately 400-feet south of the subject Site. A BEA was completed for the former TPI site by Fitzgerald Henne & Associates, Inc. on July 22, 1999. The BEA referenced a Phase I ESA (also completed by Fitzgerald Henne & Associates, Inc.) that identified three RECs including the following:

- *"The site is a permanently closed service station. Soil and groundwater contamination (including free phase gasoline) has been identified on the property.*
- *The site has been used as a service station since the 1920s. The former building associated with the original service station operation may have been used for repair work. Solvents or waste materials may have been improperly disposed on the site.*
- *The CarQuest property south of the site was formerly a service station and auto repair shop. No records exist regarding whether this property is contaminated, however, groundwater flows north, and contaminants (if present) could migrate from this property onto the site."*

The BEA concluded that the 815 North Mission Street site is a *facility* based on soil and groundwater contamination. Groundwater flow was documented as northerly toward the subject Site. As indicated in Sections 4.7 and 5.1.2.5, this site identifies a REC with regard to the subject Site.

5.1.3 Tribal Database Review

MTC reviewed the following tribal databases provided by EDR for facilities cited within the specified search radii:

<u>Database</u>	<u>Radius Searched (Miles)</u>
• INDIAN RESERV	1.0
• INDIAN LUST	0.5
• INDIAN UST	0.25

5.1.3.1 Indian Reservations

The INDIAN RESERV database lists Indian administered lands of the United States that have any area equal to or greater than 640 acres. One INDIAN RESERV site was listed within 1.0-mile of the subject Site.

Isabella Indian Reservation

The Isabella Indian Reservation includes a large portion of Isabella County including the area surrounding the subject Site. The location of the reservation does not identify a REC.

5.1.3.2 Indian LUST Database

The INDIAN LUST database identifies leaking underground storage tanks (LUSTs) on Indian land. INDIAN LUST sites were not listed within 0.5-mile of the subject Site.

5.1.3.3 Indian UST Database

The INDIAN UST database identifies underground storage tanks (USTs) on Indian land. Six INDIAN UST sites were listed within 0.25-mile of the subject Site. None of the sites were adjacent to the subject Site. Two sites were located hydraulically upgradient from the subject Site. One site upgradient, Olson Tire Service (704 East Pickard, also known as the former TPI site at 815 North Mission Street) was previously identified as a

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 22

REC with regard to the subject Site as discussed in Sections 4.7 and 5.1.2.6 and Appendix F. The second upgradient site Rise Machine (905 North Kinney) is not identified as a REC with regard to the subject Site due to location and distance.

5.1.4 EDR Proprietary Database Review

MTC reviewed the following proprietary database provided by EDR for facilities cited within the specified search radii:

<u>Database</u>	<u>Radius Searched (Miles)</u>
• Manufactured Gas Plants	1.0

5.1.4.1 Manufactured Gas Plants

The Manufactured Gas Plants database includes records of coal gas plants as compiled by EDR's researchers. One Manufactured Gas Plant site was identified within 1.0-mile of the subject Site. The City Gas Company site located at 111 East Pickard is not identified as a REC with regard to the subject Site on the basis of location and distance.

5.2 **Additional Environmental Record Sources**

5.2.1 Local Regulatory Agencies

According to ASTM Practice Designation E1527-05, local regulatory agencies are contacted for file information regarding historical incidents involving the release of hazardous materials or petroleum products at a site. MTC contacted the Central Michigan District Health Department to inquire whether there was a record of fires, chemical spills, or other potentially deleterious activity at the subject Site. The request was denied on the basis that file information is not available on the subject Site. Detailed discussion regarding interviews with local agencies is provided in Section 7.4.

5.3 **Physical Setting Source(s)**

The following section provides information regarding the general physiographic, hydrologic and soil conditions in the vicinity of the subject Site.

5.3.1 Regional Physiography

Regional topographic information was obtained by review of the U.S. Geological Survey (USGS) Mount Pleasant Quadrangle. The subject property has an average elevation of approximately 693-feet above mean sea level (msl). The nearest surface water feature is the Chippewa River located approximately 0.5-mile northwest of the subject Site. Drainage is provided by City storm sewers.

5.3.2 Groundwater Conditions

Groundwater is present approximately 9-feet below the ground surface. The direction of groundwater indicated by previous reports is northerly toward the Chippewa River. The database search identified eleven (11) water wells within a 1.0-mile radius of the subject Site. None of the wells were located on the subject Site. Additional information regarding the depth, construction and location of these and other nearby wells is included in previous reports provided in Appendix F.

5.3.3 Soil and Rock Conditions

The State of Michigan, Department of Natural Resources, Geological Survey Division's *Quaternary Geology of Southern Michigan (1982)* and the EDR Geocheck[®] report were reviewed for information concerning rock and soil conditions at the subject Site.

Site soils consist of the Mecosta Series. The Mecosta sand is characterized by well-drained to excessively well-drained sands and gravels formed in glacial lacustrine deposits. The saturated hydraulic conductivity is high. The depth to water is reported to be more than six feet.

Surficial unconsolidated material is comprised of glacial lacustrine deposits ranging from 100- to 200-feet thick and underlain by Jurassic sandstones (*Hydrogeologic Atlas of Michigan, Western Michigan University 1981*).

5.4 **Historical Use Information on the Property**

The Site history was developed from ASTM Standard Historical Sources and files including:

- Interview with the property owner;

1011 North Mission Street

Project No. 061340

November 27, 2006

Page 24

- Aerial photographs dated 1938, 1952, 1958, 1965, 1972, 1982 and 1992
- Review of City Directory Abstracts from 1926 to 2005.
- Fire Insurance Maps were not available for this site

5.4.1 Interview with Property Owner

On September 28, 2006, MTC conducted the site visit and interview with First Lieutenant Christopher Stolicker, Post Commander for the Mount Pleasant State Police and Owner's representative. No evidence of suspect environmental conditions and/or RECs was identified by the Owner interview. Interview documentation is provided in Appendix H.

5.4.2 Aerial Photograph Review

Aerial photographs dated 1938, 1952, 1958, 1965, 1972, 1982 and 1992 were reviewed to evaluate changes in property use or existence of structures. A description of each photograph is provided below. Copies of aerial photographs are included in Appendix I.

Review of the 1938 photograph indicates that the subject Site is visible. Dense residential development is present southwest of the intersection of Pickard and Mission Street. The area north of Pickard is predominantly agricultural; however, industrial property appears present west of the subject Site. No evidence of a REC was visible on this photograph.

Review of the 1952 photograph indicates additional commercial development on the east side of North Mission Street. Land immediately west of the subject Site appears to be undeveloped. The area southeast of the intersection of Mission and Pickard has undergone significant development. A series of trails appear west of the subject Site. No evidence of a REC was visible on this photograph.

Review of the 1958 photograph indicates continued commercial development along North Mission Street and along Pickard. A series of trails appear west of the subject Site. No evidence of a REC was visible on this photograph.

Review of the 1965 photograph indicates continued development along North Mission and Pickard. Virtually all of the visible agricultural land is developed. Construction of Business Route US-127 is visible to the north. The UPS facility appears to be under construction to the west of the subject Site.

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 25

Review of the 1972 photograph indicates little visible change from the 1965 photograph. Construction appears to be complete on Business Route 127 North and the UPS facility. No evidence of a REC was visible on this photograph.

Review of the 1982 photograph indicates little visible change from the 1972 photograph.

Review of the 1992 photograph indicates little visible change from the 1982 photograph.

MTC's review of aerial photographs did not identify a REC with regard to the subject Site and/or adjacent properties.

5.4.3 City Directory Review

MTC reviewed abstracts from Polk's City Directory from 1926 through 2005. The listed addresses for the 1011 North Mission Street subject Site are summarized below:

1926	Address not listed
1930	Address not listed
1936	Address not listed
1942	Address not listed
1948	Address not listed
1953-1985	Michigan State Police Post
1990	State of Michigan
1995	Address not listed

No additional information regarding specific RECs and/or suspect conditions was developed from the City Directory Abstracts Review for the 1011 North Mission Street address which are provided in Appendix J.

5.4.4 Fire Insurance Map Review

Fire insurance (Sanborn) maps were not available for the subject Site. The certificate indicating "no coverage" is provided in Appendix K.

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 26

5.5 Historical Use Information on Adjoining Properties

The City Directory Abstracts were reviewed with respect to neighboring properties. The following information was obtained regarding properties in the vicinity of the subject Site that may have used hazardous substances as part of their operations.

905 North Mission Street

1926	Roy D. Hafer Oil Co.
1936	Michigan State Police
1942	Hafer Oil Co.
1948	Hafer Oil Co. & Straker Supply Oil
1953-1958	Residence
1962	Hafer Oil Co.
1966	Hafer Oil Co.
1970	Hafer Oil Co.
1975	Hafer Oil Co.
1980	Hafer Oil Co.
1985-2005	Not Listed

1015 North Mission Street

1980	Lee-Wrights, Inc.
1985	Nu-Way Brake & Equipment
1990-2005	Southwest Brake & Parts

1104 North Mission Street

1962-1975	North American Drilling Co.
1985	Mason Drilling Fluids

The Roy D. Hafer Oil Company was listed at 905 North Mission Street from 1926 to 1948 (not including 1936). The address of the Michigan State Police Post was also listed as 905 North Mission in 1936 and then is listed at 1001 North Mission Street in 1948, and 1011 North Mission subsequent to 1953. It was not determined if the directory is in error, the street numbering was changed or if the Hafer Oil Company formerly occupied the subject Site. Hafer Oil is known to have operated a service station at the northwest corner of Pickard and North

Mission Street. Groundwater flow is known to be northerly at this location. The former presence of a service station immediately south of the subject Site identifies a REC. None of the other addresses listed by the City Directory Abstracts identifies a REC.

Additional historical information regarding adjacent properties is provided in Section 5.4.2.

6.0 SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

The purpose of MTC's site reconnaissance was for visual observation specifically to evaluate the subject Site for evidence of RECs which could suggest the presence of hazardous materials or petroleum products in the environment or suspect environmental conditions. The following sections describe MTC's observations and findings resulting from our reconnaissance. Mr. Stephen K. Young, C.P.G. (Environmental Department Manager) conducted the Site visit and completed the site visit questionnaire on September 28, 2006 (Appendix H). Photographs taken during the site visit are included in Appendix L.

6.2 General Site Setting

The subject property is located in the SE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 10, Town 14 North, Range 4 West, Mount Pleasant Quadrangle, Isabella County, Michigan. According to the City of Mount Pleasant, the parcel is zoned Central Business District (C-2). Based on a limited reconnaissance, adjacent properties consist of commercial properties with no visual evidence of suspect environmental conditions and/or RECs. Southwest Brake located immediately north of the subject Site may use hazardous chemicals or petroleum products as part of their day-to-day operations. Evidence of a release was not observed during site reconnaissance.

6.3 Exterior Observations

The exterior of the property consists of a two-story brick building and two galvanized metal small outbuildings on the north side of the structure. One is used for storage; the other was formerly used to house a groundwater treatment system. The structure and paved surfaces occupy approximately 60-percent of the subject Site. Additional observations consistent with requirements in ASTM E1527-05 are summarized below.

6.3.1 Underground Storage Tanks (USTs)

No evidence of existing USTs was identified on the subject Site. A UST system was removed from the subject Site in 1992. Equipment associated with an inactive groundwater treatment system is present on the subject Site. Evidence of a former groundwater treatment system identifies a REC.

6.3.2 Aboveground Storage Tanks (ASTs)

No evidence of the presence of ASTs was observed on the exterior of the structure. No evidence of a REC related to current on-site AST systems is present.

6.3.3 Hazardous Substances or Petroleum Products Use

The identification of a groundwater treatment system and associated monitoring wells indicates a past release of hazardous substances and/or petroleum products which identifies a REC. Other evidence of the use of hazardous materials and/or petroleum products was not identified.

6.3.4 Electrical Transformers/Equipment

Electrical transformers were not identified on the subject Site. Based on this information, no evidence of a REC or suspect environmental condition related to exterior electrical transformers/equipment is present.

6.3.5 Dry Wells and Sumps

Evidence of exterior drywells or sumps was not observed on the exterior of the subject Site during MTC's reconnaissance. Based on this information, no evidence of a REC or suspect environmental condition related to dry wells and/or sumps related to exterior property use is present.

6.3.6 Pits, Ponds, and Lagoons

No evidence of pits, ponds, or lagoons was observed on the exterior of the subject Site during MTC's site reconnaissance. No evidence of a REC or suspect environmental condition related to pits, ponds, or lagoons on the subject Site is present.

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 29

6.3.7 Wells

No evidence of drinking water wells was observed during MTC's reconnaissance. The site receives potable water from the City of Mount Pleasant municipal system. Several monitoring wells were observed on the subject Site, which were associated with the UST release. Evidence of a past release identifies a REC.

6.3.8 Solid Waste

The subject Site is vacant. Based on interview documentation and site reconnaissance, the subject Site does not generate solid waste and does not have a scheduled solid waste pick up. Based on this information, there is no evidence of a REC or suspect environmental condition related to solid waste.

6.3.9 Septic System

Evidence of a septic system was not observed on-site. Based on this information, no evidence of a REC or suspect environmental condition related to septic systems or drain fields is present.

6.3.10 Stressed Vegetation

Approximately 60-percent of the subject Site is covered by pavement and/or structures. Stressed vegetation was not observed during MTC's site reconnaissance.

6.3.11 Soil/Water Sampling

Soil/groundwater sampling and/or chemical analyses were not part of MTC's Phase I ESA scope of services.

6.3.12 Oil/Water Separators

Evidence of oil/water separators was not observed or known to exist on the exterior of the subject Site. There was no observable evidence of a suspect environmental condition and/or REC from oil/water separators on the subject Site.

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 30

6.3.13 Surface Water Runoff

The subject Site is approximately 60-percent occupied by structures and/or pavement. Several stormwater catch basins are located along North Mission Street.

6.3.14 Other Observations

Drum scars were observed on the asphalt pavement west of the outbuildings. The scars are most likely associated with the handling of fluids during installation of the treatment system and/or monitoring wells. The former UST release was identified as a REC. No other exterior observations were made at the subject Site with respect to RECs.

6.4 **Interior Observations**

6.4.1 Stains or Corrosion

Staining was observed in the basement of the structure due to flooding. Additional stains appear to be associated with the boiler. Since this staining appears to be from water, it is not identified as a REC.

6.4.2 Floor Drains

Several vertical pipes were observed in the basement floor. The pipes appear to be drains without grates and/or covers. The connection to the City's sanitary sewer was not confirmed. The presence of drains without confirmation of the point of discharge identifies a suspect environmental condition.

6.4.3 Potential Asbestos/Lead-Containing Materials

Asbestos surveys are not required in Phase I ESAs under ASTM E1527-05. MTC was not retained to evaluate site structures for the presence of asbestos containing materials (ACMs). Due to the age of the structure, ACMs and lead-based paint may be present within the structure.

6.4.4 Maintenance Areas

Maintenance areas were not identified. Two cans of paint were properly stored on storage shelves. An empty weapons rack was also identified on the main floor that formerly contained various firearms maintenance items. Evidence of a REC related to maintenance areas was not identified.

6.4.5 Electrical Transformers/Equipment

Electrical transformers were not identified on the subject Site. Based on this information, there is no evidence of a REC or suspect environmental condition related to electrical equipment or transformers.

6.4.6 Hazardous Wastes Generated and Waste Storage Areas

The subject Site was not known to generate hazardous waste. Hazardous waste was not observed on the interior of the subject Site. Based on this information, there is no evidence of a REC or suspect environmental condition related to hazardous waste generation and/or storage.

6.4.7 Aboveground Storage Tanks (ASTs)

Regulated ASTs were not observed on the interior of the subject Site. Based on this information, there is no evidence of a REC or suspect environmental condition related to ASTs located on the interior of the structure.

7.0 INTERVIEWS

7.1 **Interview with Site Owner**

The current owner of the property is the State of Michigan. A representative for the State of Michigan (Ms. Tracy DeClercq) completed the ASTM E1527-05 User Questionnaire which is contained in Appendix H. An interview was conducted with First Lieutenant Christopher Stolicker, Post Commander for the Mount Pleasant State Police who functions as the Owner's representative and Site Manager.

7.2 Interview with Site Manager

On September 28, 2006, MTC conducted the site visit and interview with First Lieutenant (F/Lt.) Christopher Stolicker, Post Commander for the Mount Pleasant State Police. F/Lt. Stolicker was stationed at the subject Site from 1994 to 1998. He indicated that new Mount Pleasant State Police Post was occupied in 1999 at which time, operations ceased at the subject Site. F/Lt. Stolicker indicated that the former groundwater treatment system ceased operations in approximately 1998. No evidence of suspect environmental conditions and/or RECs was identified by the Owner interview. Interview documentation is provided in Appendix H.

7.3 Interviews with Site Occupants

The subject Site is vacant and by definition does not have occupants.

7.4 Interviews with Local Government Officials

According to ASTM Practice Designation E1527-05, local regulatory agencies are contacted for file information regarding historical incidents involving the release of hazardous materials or petroleum products at the subject Site.

MTC submitted a Freedom of Information Act Request to the Central Michigan District Health Department in Mount Pleasant, Michigan to obtain file information regarding environmental spills or cleanup. The FOIA was denied on the basis that files do not exist for the subject Site. The denial letter is included in Appendix G. Based on reasonably ascertainable information obtained through our contact with local agencies, no evidence of suspect environmental conditions or RECs was documented at the subject Site.

7.5 Interviews with Others

No other interviews were conducted.

8.0 FINDINGS

Based on protocol established in ASTM E1527-05, the following items were identified as suspect environmental conditions, *de-minimus* conditions or RECs. Additional discussion regarding the status of these issues is provided in Section 9.0.

- Floor Drains in Basement

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 33

- Open LUST Status of subject Site
- Migration of Contaminants from Off-site Sources

9.0 OPINION

The following discussion provides rationale regarding suspect environmental conditions and whether in the opinion of MTC, they should be considered RECs at the time of this Phase I ESA.

9.1 Floor Drains in Basement

Several open pipes located in the basement of the structure appear to be drains. The discharge point for the drains was not determined. The presence of drains with an unknown discharge point identifies a suspect environmental condition. A dye test should be conducted to determine if the drains are connected to the sanitary sewer. If the drain are determined to be drywells, sampling should be conducted near the drain terminus. If the drains are determined to be connected to the storm sewer, the connection should be permanently grouted.

9.2 Open LUST Status of subject Site

The LUST status of the subject Site identifies a REC. Additional work is not currently being performed pursuant to closure of the confirmed release based on an argument presented by DLZ that migration of contamination from properties to the south had impacted the subject Site. In addition, the infiltration gallery had become fouled and inoperable. DLZ indicated that rejuvenation of the system would not be cost effective. The identification of contaminants on the subject Site whether from on-site or off-site sources identifies a REC.

9.3 Migration of Contaminants from Off-site Sources

Previous reports provide evidence of the migration of contaminants from the former TPI site located at 815 North Mission Street and the J.W. Filmore Site located at 903 North Mission Street. This information identifies a REC.

10.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM E1527-05 of a parcel located at 1011 North Mission Street in Mount

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 34

Pleasant, Michigan. This ESA has revealed evidence of one suspect environmental condition (floor drains in basement) and two RECs (open LUST status and migration of contaminants from off-site sources) in connection with the subject Site. A potential buyer of the property must accept any and all risk associated with the suspect conditions or perform sampling or obtain documentation necessary to evaluate said risk. If sampling is conducted and elevated levels of contaminants are found, a Baseline Environmental Assessment (BEA) would be completed to evaluate the nature and extent of any contamination and provide the means to distinguish past from future releases. The BEA must be performed within 45-days of the closing date and disclosed to the MDEQ. After completing the BEA, the purchaser would not be responsible under Act 451 Part 201 as amended, for cleanup of contaminants identified (if any) provided that conditions are not exacerbated. Exacerbation could include excavation, exposure, or transport of contaminated materials. Due Care requirements will continue with all ownership as necessary to prevent unacceptable exposures to hazardous materials. Any exceptions or deletions from this practice, as applicable, are described in Section 11.0 of this Report.

11.0 DEVIATIONS

Deviations from ASTM E1527-05 procedures are identified as data gaps and include the following:

An Environmental Lien Check was not completed for this Phase I ESA. The subject Site is listed as an open LUST site with no previous history of environmental investigation or cleanup.

The Michigan State Police Post is believed to represent the first developed use of the subject Site; however, this was not documented.

In a strict interpretation of ASTM E1527-05, the above identifies data gaps.

12.0 ADDITIONAL SERVICES

Completion of this Phase I ESA for the property located at 1011 North Mission Street in Mount Pleasant, Michigan has identified one suspect environmental condition (floor drains in basement) and two RECs (open LUST status and migration of contaminants from off-site sources) connected to the subject Site. Based on our findings, soil and groundwater sampling is necessary to evaluate if the subject Site meets the definition of a "facility" under Part 201 and whether a BEA should be completed. Sampling may be completed as part of a Phase II ESA. If contaminant concentrations are detected above applicable cleanup standards, a BEA should be completed to protect the purchaser from liability under Act 451, Part 201 as amended.

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 35

13.0 REFERENCES

ASTM Practice Designation E1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process: American Society for Testing and Materials, 100 Barr Harbor Drive, West Conshohocken, PA, 2000.

Hydrogeologic Atlas of Michigan, Western Michigan University, Kalamazoo, Michigan, 1981.

Quaternary Geology of Southern Michigan: Michigan, Department of Natural Resources, Geological Survey Division, 1982.

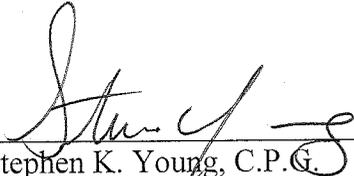
1011 North Mission Street
Project No. 061340
November 27, 2006
Page 36

14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, we meet the definition of *Environmental professional* as defined in §312.10 of 40 CFR 312 and

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

This Report Prepared By:



Stephen K. Young, C.P.G.
Environmental Department Manager
Materials Testing Consultants, Inc.
693 Plymouth Avenue NE
Grand Rapids, MI 49505

This Report Reviewed By:

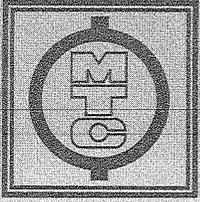


Christopher J. Kestner, C.I.E.
Environmental Division Manager
Materials Testing Consultants, Inc.
693 Plymouth Avenue NE
Grand Rapids, MI 49505

12/06, 2006

1011 North Mission Street
Project No. 061340
November 27, 2006
Page 37

15.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS



Materials
Testing
Consultants, INC.

STEPHEN K. YOUNG, C.P.G., C.P.

EXPERIENCE:

Environmental Department Manager. 2000-Present

Responsible for business development and management of environmental projects and staff. Project responsibilities include Project Manager for Michigan Department of Management and Budget contracts for environmental projects associated with demolition, remediation and UST closure, Environmental Permitting, Phase I and II Environmental Site Assessments, Baseline Environmental Assessments, Section 7a Compliance, stormwater issues, UST investigations, implementation of operation and maintenance contracts.

Years with Other Companies: 12

PROJECT PARTICIPATION:

Western Wayne County Correctional Facility, Plymouth, Michigan. Management of all contracts and environmental issues associated with Phase I Environmental Site Assessment and human health risk assessment for a 175-Acre, 10-structure, 700-inmate prison facility constructed within and above a former open dump. Project consisted of the evaluation of exposure risks to employees, inmates, visitors and nearby residents through contact and inhalation pathways. Sampling activities include landfill gas assessment, geophysical studies to delineate the extent of waste materials, soil, surface water and groundwater sampling and preparation of the risk assessment. Project completed under State of Michigan Design/Construction Consultant Services contract.

J.H. Campbell Plant, West Olive, Michigan. Project management for all environmental issues related to the completion of an engineering study for a marine dredge and construction project associated with delivery of Selective Catalytic Reduction (SCR) system components to the Consumers Energy J.H. Campbell Plant in Ottawa County, West Olive, Michigan. Installation of the SCR components is part of Consumer Energy's strategic plan to reduce NOx emissions for Clean Air Act Title I, Title IV, and Michigan Rule 801. The engineering report evaluated three alternatives considered for delivery of the SCR components and provided rationale for selection of the preferred alternative including relative impacts on potentially sensitive environmental receptors (i.e., critical dunes, wetlands, fisheries, threatened species). The selected alternative was delivery of SCR components via Great Lakes barge. Dredging of 16,000-cubic yards was necessary to accommodate barge delivery. Construction of a temporary barge mooring/offloading area was also required. Testing of

Stephen K. Young, C.P.G., C.P.

Page 2

potential dredge material indicated an inert composition and allowed disposal as clean sand for beach nourishment.

Private Lake and Gravel Mine Design and Permitting. Evaluation of gravel deposit and hydrogeology for mining and development of a 15-acre lake and associated wetlands. Included collection of data and negotiations with the State of Michigan and local units of government. Successful permit applications were completed for regulations associated with wetlands, inland lakes and streams and soil erosion and sedimentation control.

Northville Psychiatric Hospital – Northville, Michigan. Project Management of all environmental issues associated with Phase I, Phase II Environmental Site Assessments and a Feasibility Study for demolition and sale of a 422-Acre, 25-structure state hospital campus. Environmental conditions included underground storage tanks, above ground storage tanks, oil wells and pipelines, vehicle maintenance areas, paint facilities, a coal burning power plant, salt storage areas, and 7.5-acres of onsite dump containing hospital waste. Project included site reconnaissance using global positioning system technology, soil and groundwater sampling, and expedited onsite mobile laboratory analyses for metals, polychlorinated biphenyls, volatile and semi-volatile organic compounds. Upon completion of the Phase II ESA, the Feasibility Study was completed to review remedial alternatives and evaluate cleanup costs.

Grand Center Expansion – Grand Rapids, Michigan. Management of all environmental issues associated with the 220-million dollar expansion of the trade show and convention center located in downtown Grand Rapids. The project included demolition of several multi-story buildings on an 11-acre urban brownfield site located on a major river with a 100-year industrial history. MTC conducted asbestos surveys, investigative activities to identify and define areas of environmental impact, conducted Phase I and II Environmental Site Assessments, Baseline Environmental Assessments, Part 201 Section 7a Compliance evaluations, UST remediation and closure, feasibility assessments, reviewed treatment technologies, negotiated discharge permits with State and City officials, addressed stormwater issues, and managed waste characterization, excavation and disposal of 150,000 cubic yards of contaminated material.

Clinton Valley Center. Project Manager for Michigan Department of Management and Budget project LUST remediation contract. Project included hazardous Materials Abatement, Building Demolition, Underground Storage Tank Removal and Closure. This Michigan Department of Management and Budget project consisted of professional engineering and industrial hygiene services necessary to provide project management for demolition, environmental remediation, and site restoration for the Clinton Valley Center, a 360-acre, 37 building complex in Pontiac, Michigan. MTC personnel inspected the site for the presence

Stephen K. Young, C.P.G., C.P.

Page 3

and location of asbestos and other environmental hazards. All 37 structures were targeted for demolition including power generation facility with 170-foot stack, four 30,000-gallon fuel oil UST's, one leaking 5,000-gallon gasoline UST, water tower, and approximately 972,060 square feet of building space. MTC provided engineering services for environmental

remediation of five USTs, which was complicated by the presence of rick wells and steam tunnels. MTC developed bid documents and specifications for all demolition and environmental remediation activities. Our inspectors and technicians documented all demolition activities, and our geologists and engineers certified UST closure.

Gratiot County Landfill - St. Louis, Michigan. Project manager for current Michigan Department of Environmental Quality Superfund project, which has included design and installation of a groundwater remediation system for a solid waste disposal facility. MTC supervised installation of the remediation system consisting of extraction wells, monitoring wells, treatment building, pumps, controls and associated piping, effluent force main, and air stripper. MTC performed all operation and maintenance for the first year of operation and received three and five-year extensions to the contract.

Plating Lagoon Closure. Corrective Measures Study and Corrective Action Work plan for hexavalent chromium remediation at RCRA facility. Developed statistical sampling plan for verification of soil remediation. Geophysical pilot study using electromagnetic resonance imaging to track plume. Hydrogeological investigation to map extent of contaminant plume as it interacted with the Grand River sediments.

EDUCATION:

Michigan State University Bachelors of Science (Geological Sciences)
Post Graduate Studies

CERTIFICATES/CONTINUING EDUCATION:

Certified Professional Geologist No. 10853 - American Institute of Professional Geologists
MDEQ Certified Underground Storage Tank Professional No. 1067
MDEQ Part 91 Soil Erosion and Sedimentation Control, Certificate No. 01-0548
MDEQ Certified Construction Site Stormwater Operator, Certificate No. C-03084
29 CFR 1910.120 40-hour Hazardous Waste Worker Training
29 CFR 1910.146 Confined Space Entry Training
Applied Groundwater Flow & Contaminant Transport Modeling
ASTM Risk-Based Corrective Action at Petroleum Release Sites

Stephen K. Young, C.P.G., C.P.

Page 4

Sampling Strategies and Statistical Application for Compliance With Part 201 Cleanup Criteria

Soil Erosion Control Concepts 2002

RCRA Facility Assessment Training

Michigan Qualified Underground Storage Tank Consultants and Certified Professionals Seminar

Soil Mechanics and Soil Barrier Systems

Accelerated Bioremediation Using Slow Release Compounds

PROFESSIONAL AFFILIATIONS:

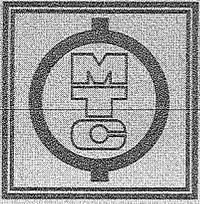
National Groundwater Association

American Institute of Professional Geologists

PUBLICATIONS:

Young, S.K., Eluskie, J.A., Sibley, D.F., and Westjohn, D.B., "Diagenesis of the Marshall Sandstone, " Michigan, Its Geology and Geologic Resources, 2nd Symposium, Program and Abstracts, Geologic Survey Division, Michigan Department of Natural Resources, East Lansing, Michigan, 1991

Young, S.K.; Sibley, D. F.; Zacharias, K. F.; Westjohn, D. B.; Long, D.T. 1993, Burial Diagenesis and pore-water chemistry evolution in the Marshall Sandstone regional aquifer, Michigan Basin: Michigan: "Its Geology and Geologic Resources", 3rd Symposium, Programs and Abstracts, p.17.



Materials
Testing
Consultants, INC.

CHRISTOPHER J. KESTNER, C.I.E.

EXPERIENCE:

Environmental Division Manager. April 2003 – Present

Responsibilities include overseeing project and personnel management, review of quality assurance programs, training new employees in analytical procedures and techniques, client and public relations, method and new business development for the Environmental Division.

Asbestos Department Manager. October 2000 – Present

Responsibilities include overseeing project and personnel management, review of quality assurance programs, training new employees in analytical procedures and techniques, client and public relations, method and new business development. Performance of asbestos air monitoring and analysis using Polarized Light Microscopy (PLM) and Phase Contrast Microscopy (PCM).

Project Manager. 1990 – October 2000

Responsibilities include project and personnel management, review of quality assurance programs, training new employees in analytical procedures and techniques, client and public relations, method and new business development. Performance of Phase I and II Environmental Site Assessments, project management of Underground Storage Tank removals, and asbestos air monitoring and analysis using Polarized Light Microscopy (PLM), and Phase Contrast Microscopy (PCM).

Years with Other Companies: 7

PROJECT PARTICIPATION:

Project Management, Personnel Management and Training, Air Monitoring, PCM Analysis, Coordination for the following asbestos-related projects:

DeVos Place, Grand Rapids, Michigan
Clinton Valley Center, Pontiac, Michigan
Former Ypsilanti Regional Psychiatric Hospital, Milan, Michigan
Delta College, University Center, Michigan
Caro Center, Caro, Michigan
Northville Psychiatric Hospital, Northville, Michigan

Numerous Phase I Environmental Assessments

Numerous Commercial and Residential Asbestos Air Clearances

EDUCATION:

Central Michigan University

BS Biology/Psychology

Christopher J. Kestner, C.I.E.
Page 2

PROFESSIONAL CERTIFICATIONS:

Asbestos Building Inspector, Michigan
Asbestos Management Planner, Michigan
Asbestos Project Designer, Michigan
Certified Indoor Environmentalist

CERTIFICATIONS/CONTINUING EDUCATION:

Asbestos Building Inspector Course, WMI Environmental Services, 7/93.
Annual Refresher AHERA Inspector Training, Various Locations, 7/94 - present.
Asbestos Management Planner Course, DeLisle Associates, LTD, 9/00.
Annual Refresher Asbestos Management Planner Course, Various Locations, 6/01 - present.
Asbestos Project Designer Course, Jensen Environmental Training Services, Inc., 11/00.
Annual Refresher Asbestos Project Designer Course, Various Locations, 10/01 - present.
Sampling and Evaluating Airborne Asbestos Dust (582), US Department of Health and Human Services, NIOSH, 5/91.
Quantitative Asbestos Analysis, McCrone Research Institute, 4/91.
Microscopical Identification of Asbestos, McCrone Research Institute, 2/91.
OSHA 40-Hour Hazardous Waste Operations Course, Tillotson Environmental Occupational Consulting, 9/93.
Annual 8-Hour Refresher Hazardous Waste Site Operations Training, Various Locations, 7/92 - 2000.
Nuclear Testing Equipment - Radiological Safety and Gauge Operation, Troxler Electronic Laboratories, Inc., 5/93.
Environmental Risk Management for Business and Property Transactions, Environmental Data Resources, 12/92.
Adult CPR, American Red Cross, 11/92.
Annual CPR Refresher Training, Various Locations, 3/94 - 2000.
Standard First Aid, American Red Cross, 11/92.
3-Year Refresher - Standard First Aid, Environmental, Safety and Health, Inc., 3/94 - 2000.
Lead Paint Abatement, HUD Guidelines Course, Leadtec Services, Inc., 10/91.
Guidelines for the Assessment of Microbiological Contamination in Indoor Environments, AIHA Teleweb Virtual Seminar, 4/02.
Certified Indoor Environmental Course, 10/02.

PROFESSIONAL AFFILIATIONS:

American Industrial Hygiene Association (AIHA)
Association of Professional Industrial Hygienists (APIH)
Society of American Military Engineers (SAME)
Construction Specifications Institute
Indoor Air Quality Association (IAQA)

APPENDIX A

Limitations for Phase I Environmental Site Assessments

**LIMITATIONS
FOR
PHASE I ENVIRONMENTAL SITE ASSESSMENTS**

1. The observations were made of the Site and structures as described in this ESA Report and under the conditions stated therein. Where access to portions of the Site or structures on the Site was unavailable or limited, MTC renders no opinion as to the presence of hazardous materials or to the presence of indirect evidence relating to hazardous material in that portion of the Site or structure. In addition, MTC renders no opinion as to the presence of hazardous material, or to the presence of indirect evidence as to the presence of hazardous material where direct observation of the interior walls, floor, or ceiling of the structure on the Site was obstructed by objects or coverings on or over these surfaces. The conclusions presented in the Report were based solely upon the services described therein, and not on scientific tasks or procedures beyond the scope of described services or the time and budgetary constraints imposed by Client.
2. In preparing this Report, MTC relied upon certain information provided by federal, state or local officials and other parties referenced therein, and on information contained in files of agencies made available to MTC at the time of this ESA. MTC did not attempt to independently verify the accuracy or completeness of all information reviewed or received during the course of this ESA.
3. In the event that bank counsel or title examiner for Client obtains information on environmental or hazardous waste issues at the Site that are not contained in this Report, MTC requests that such information be brought to MTC's attention forthwith such that on the basis of MTC's evaluation of such information, MTC may modify the conclusions of this Report.
4. MTC did not perform any testing or analysis for the presence of PCBs, asbestos or lead at the Site or in the environment at the Site unless otherwise specified in the Report. Where such analysis have been conducted by an outside laboratory, MTC has relied upon the data provided, and has not conducted an independent evaluation of the reliability of the data.
5. The purpose of this ESA was to assess the physical characteristics of the Site with respect to the presence of hazardous material or oil in the environment. No attempt was made to check on the compliance of present or past owners or operators of the Site with federal, state or local laws and regulations, environmental or otherwise.