

**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

Performed on:

Tract 2
East End Industrial Park
Russellville, Arkansas 72801

EEG PROJECT #18-0115-019

Prepared for:

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DEFINITIONS

Adjoining property refers to any real property of which the border is contiguous or partially contiguous with that of the property. This includes a property that would be contiguous or partially contiguous but for a road, street or other public thoroughfare separating them.

All appropriate inquiries refers to inquiries constituting “all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice” as defined in CERCLA, 42 U.S.C § 9601(35)(B), that will qualify a party to a commercial real estate transaction for one of the threshold criteria for satisfying the LLPs to CERCLA liability, assuming compliance with other elements for the defense.

Approximate minimum search distance identifies the area for which records must be obtained and reviewed as pursuant to ASTM E 1527 Section 8 subject to the limitations provided in that section.

Bona fide prospective purchaser liability protection is defined by ASTM E 1527 Section 3 as a person may qualify as a bona fide prospective purchaser if, among other requirements, such person made “all appropriate inquiries into the previous ownership and uses of the facility in accordance with generally accepted good commercial and customary standards and practices.” Knowledge of contamination resulting from all appropriate inquiries would not generally preclude this liability protection. A person must make all appropriate inquiries on or before the date of purchase. The facility must have been purchased after January 11, 2002.

Brownfield are “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.” Brownfield vary in size, location, age, and past use. Such properties can range from a small, abandoned corner gas station to a large, multi-acre former manufacturing plant that has been closed for years.

Business environmental risk refers to the risk that may have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice. Consideration of business environmental risk issues may involve addressing one or more non-scope considerations, some of which are identified in ASTM E 1527 Section 13.

Contiguous property owner liability protection is defined by ASTM E 1527 Section 3 as a person may qualify for the contiguous property owner liability protection if, among other requirements, such person owns real property that is contiguous to, and that is or may be contaminated by hazardous substances from other real property that is not owned by that person. Furthermore, such person conducted all appropriate inquiries at the time of acquisition of the property and did not know or have reason to know that the property was or could be contaminated by a release or threatened release from the contiguous property. The all-appropriate inquiries must not result in knowledge of contamination. If it does, then such person did “know” or “had reason to know” of contamination and would not be eligible for the contiguous property owner liability protection.

Controlled recognized environmental condition is defined by ASTM E 1527 Section 3 as a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). A condition considered by the environmental professional to be a controlled recognized environmental condition shall be listed in the findings section of the Phase I Environmental Site Assessment report, and as a recognized environmental condition in the conclusions section of the Phase I Environmental Site Assessment report.

De minimis condition refers to a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.

Engineering controls (EC) are the physical modifications to a site or facility to reduce or eliminate the potential for exposure to hazardous substances or petroleum products in the soil, soil vapor, groundwater, and/or surface water on the property. Engineering controls are a type of activity and use limitation (AUL).

Environmental lien is a charge, security, or encumbrance upon title to a property to secure the payment of cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products upon a property, including (but not limited to) liens imposed pursuant to CERCLA 42 USC § 9607 (1) & 9607 (r) and similar state or local laws.

Environmental professional identifies a person meeting the education, training, and experience requirements as set forth in 40 CFR § 312.10(b). Environmental Professional (EP): a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases on, at, in, or to a property, sufficient to meet the objectives and performance factors. Such a person must: (i) hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three (3) years of full-time relevant experience; or (ii) be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries and have the equivalent of three (3) years of full-time relevant experience; or (iii) have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience; or (iv) have the equivalent of ten (10) years of full-time relevant experience.

Historical recognized environmental condition is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical recognized environmental condition, the environmental professional must determine whether the past release is a recognized environmental condition at the time the Phase I Environmental Site Assessment is conducted (for example, if there has been a change in the regulatory criteria). If the EP considers the past release to be a recognized environmental condition at the time the Phase I ESA is conducted, the conditions shall be included in the conclusions section of the report as a recognized environmental condition.

Hazardous waste is defined by RCRA as “a solid waste, or combination of solid wastes, which because of its quantity, concentration, or physical, chemical, or infectious characteristics may – (A) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.”

Institutional controls (IC) are the legal or administrative restrictions on the use of, or access to, a site or facility to (1) reduce or eliminate potential exposure to hazardous substances or petroleum products in the soil or groundwater on the property, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. Institutional controls are a type of activity and use limitation (AUL).

Migrate/Migration refers to the movement of hazardous substances or petroleum products in any form, including, for example, solid and liquid at the surface or subsurface, and vapor in the subsurface.

Practically reviewable means that the information is provided by the source in the manner and in a form that, upon examination, yields information relevant to the property without the need for extraordinary analysis of irrelevant data.

Property is identified as the real property that is the subject of the environmental assessment, including improvements, buildings and other fixtures located on the property and affixed to the land.

Publicly available information is information to which access is allowed to anyone upon request.

Reasonably ascertainable refers to information that is publicly available, obtainable from its source within reasonable time and cost restraints, and practically reviewable.

Recognized Environmental Condition refers to the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. **De minimis conditions are not recognized environmental conditions.**

User refers to the party seeking to use Practice E1527 to complete an environmental site assessment of the property. A user may include, without limitation, a potential purchaser of property, a potential tenant of property, an owner of property, a lender, or a property manager. The user has specific obligations for completing a successful application of this practice outlined in Section 6 of the ASTM E1527-13 Standard.

AST	Above Ground Storage Tank
ASTM	American Society for Testing Materials
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act of 1980
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CFR	Code of Federal Regulations
CORRACTS	Facilities subject to Corrective Action under RCRA
Non-CORRACTS	TSD Facility not subject to Corrective Action under RCRA
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
HREC	Historical Recognized Environmental Condition
LLP	Landowner Liability Protections under the <i>Brownfield Amendments</i>
LUST	Leaking Underground Storage Tank
NFRAP	Former CERCLIS Sites where No Further Remedial Action is Planned under CERLA
NPL	National Priorities List
NRCS	Natural Resource Conservation Service
PCB	Polychlorinated Biphenyls
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
SARA	Superfund Amendments and Reauthorization Act of 1986
SEMS	Superfund Enterprise Management System
SEMS-ARCHIVE	Superfund Enterprise Management System Archive
TSD	Treatment Storage Disposal
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UST	Underground Storage Tank

EXECUTIVE SUMMARY

ENVIRONMENTAL ENTERPRISE GROUP, INC. (EEG) has performed a Phase I Environmental Site Assessment (ESA) in general accordance with the scope and limitations set forth in the Scope of Work and ASTM E 1527-13 for Tract 2 of East End Industrial Park, Russellville, Pope County, Arkansas.

The Property is currently vacant undeveloped property that is zoned industrial. The site is located in Section 12, Township 7 North, Range 20 West and is described as Tract 2 of East End Industrial Park, Russellville, Arkansas. The Property has an irregular shape and consists of approximately 60 acres of undeveloped land. The site is vegetated in pasture and native grasses and wooded along the north portion and along natural drainage conveyances. An agricultural pond is located on the eastern portion of the site, and an area void of topsoil with exposed shale is located on the southwest portion of the Property. The site is fenced on the southern border and can be accessed from Tyler Road through a gate on the southwest portion. The Property is fenced, in part, on the east side. An overhead powerline utility easement is located on the northern portion of the Property and runs through the wooded portion of the Property, north of the pond. The JW Aluminum property is fenced and marks, in part, the western boundary of the subject Property.

The Property is bordered to the north by residential property; to the south by residential property then Tyler Road and beyond Tyler Road agricultural property that is zoned commercial. It is bordered to the east by a mobile home park and Rockline Industries and to the west by JW Aluminum.

According to records from the Pope County Tax Assessor's Office, the Property is currently owned by Arkansas Valley Alliance for Economic Development, Inc. Historically, the Property was agricultural since at least 1937. EEG performed a Phase I Environmental Site Assessment in October 1997 on 100 acres that included the subject Property, EEG Project #98-017. The report referenced a 1937 aerial photograph that indicated that the subject Property was used for agricultural purposes. This 1937 aerial photograph is no longer available at the NRCS office. The Property was platted in 1998 as East End Industrial Park Tract 2. The Property has remained vacant undeveloped land since it was platted and zoned industrial.

ON-SITE CONDITIONS

No recognized environmental conditions were identified on the Property. However, the following notable findings were identified.

According to the U.S. Fish and Wildlife National Wetlands Inventory Data Mapper website <http://www.fws.gov/wetlands/Data/Mapper.html>, wetlands are present on the Property. The wetland is illustrated as Palustrine, Unconsolidated Bottom, Permanently Flooded, Diked/Impounded (PuBHH). This designation is for the agricultural pond located on the eastern portion of the Property. Ponds are typically considered artificial wetlands. It is EEG's opinion, based on this designation, it is unlikely limitations on development would exist. If additional information is needed regarding potential wetlands, a thorough wetland delineation of the Property prior to development or disturbance of the areas will be required. **Figure 4** in **Appendix B** represents the wetland classification from the U.S. Fish and Wildlife National Wetlands Inventory Data Mapper website.

OFF-SITE CONDITIONS

No recognized environmental conditions related to off-site properties were identified. However, the following notable findings were identified.

JW Aluminum, located on westerly adjoining property at 777 Tyler Road, manufactures specialty flat rolled aluminum products. The facility is listed as an RCRA-CESQG that handles 100 kg or less per calendar month of hazardous ignitable and corrosive waste. No violations have been found. The facility is also listed as an aboveground storage tank (AST) facility with eleven 24,000-gallon gasoline ASTs that were installed in 1996. No underground storage tanks (UST) have been reported. The facility is located down-gradient from the subject Property and is not considered a recognized environmental condition to the subject Property.

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of *Tract 2 of East End Industrial Park located in Russellville, Pope County, Arkansas*, the Property. Any exceptions to or deletions from this practice are described in *Section 1.4* of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the Property.

1.0 INTRODUCTION

1.1 Contract Information

On June 7, 2018, **ENVIRONMENTAL ENTERPRISE GROUP, INC. (EEG)** was retained by Ms. Suzy Griffin of River Valley Alliance for Economic Development to conduct a Phase I Environmental Site Assessment (ESA) of the Property as described in EEG Proposal P18-116 dated June 6, 2018. The assessment was to be completed and a final report delivered by July 5, 2018.

1.2 Purpose and Use

The purposes of this Phase I ESA are to identify existing or potential recognized environmental conditions (as defined by ASTM Standard E-1527, hereinafter defined) affecting the Property. The Client may use the information contained in the ESA report to:

- Assist in the evaluation of legal and financial liabilities associated with the Property
- Assist in the evaluation of the Property's overall development potential
- Assist in the determination whether any immediate actions at the Property are necessary to comply with existing environmental laws and regulations
- Constitute partial or whole appropriate inquiries for purposes of CERCLA's innocent landowner defense, all appropriate inquiries, bona fide prospective purchaser liability protection, and contiguous property owner liability protection

1.3 Scope of Work

EEG conducted this assessment in accordance with, at minimum, the requirements set forth in ASTM Standard E 1527-13 and located in **Appendix A**. The Scope of Work is comprised of the following general substantive components:

- Review of historical records and environmental database information
- Site reconnaissance
- Conduct interviews with persons knowledgeable about the Property
- Report preparation

Our professional services have been performed, our findings obtained and our recommendations prepared in accordance with good commercial and customary principles and practices in the fields of environmental science and engineering for conducting an Environmental Site Assessment of a property for the purpose of identifying recognized environmental conditions. This warranty is in lieu of all other warranties either expressed or implied. This company is not responsible for the independent conclusions, opinions or recommendations made by others based on the field exploration and laboratory test data presented in this report. The work performed in conjunction with this assessment and the data developed are intended as a description of available information at the dates and locations given. This report does not warrant against future operations or conditions, nor does it warrant against operations or conditions present of a type or at a location not investigated.

It must be noted that Phase I Environmental Site Assessments are of limited scope, are noninvasive, and cannot rule out the existence of any hazardous materials or petroleum products that are present or have been released at any given site. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions. The user of this report must consider the limitations of the ASTM Standard E 1527-13 when formulating opinions as to risk associated with the site or for any other purpose. If a higher level of confidence is desired or required, a risk may be further evaluated, but not limited to, additional research or assessment. EEG will, at the request of the client, provide additional assessment options that may be available at additional cost.

1.4 Investigation Requirements Not Satisfied

Historical documents were not reasonably ascertainable to allow for the determination of Property development since at least 1940 or first developed use. This is not considered a significant data gap.

Not all of the investigation requirements as stated in ASTM 1527-13 have been satisfied by this assessment because site conditions prohibited comprehensive reconnaissance, and access to all areas of the Property was not possible. Due to heavy vegetative growth and accessibility along the creek and in wooded areas, EEG was unable to visually evaluate all portions of the Property during the site reconnaissance. However, great care was taken to walk all areas where trails, roadways or footpath allowed access.

2.0 PROPERTY DESCRIPTION

2.1 Legal Description

Ms. Suzy Griffin of River Valley Alliance for Economic Development provided the legal description for the Property to EEG; it is included in *Appendix E*.

2.2 Property Description

Mr. Keith Zimmerman, Environmental Professional, performed a site visit on June 8, 2018. The observations noted in this section apply to the site as it appeared on that day. In addition, a review of available geologic and hydrogeologic information, aerial photographs, and 7.5-minute topographic quadrangles was performed to help verify pre-existing or natural conditions of the Property and surrounding area. Site Location Maps showing general site layout are provided in *Appendix B*.

The Property is currently vacant undeveloped property that is zoned industrial. The site is located in Section 12, Township 7 North, Range 20 West and is described as Tract 2 of East End Industrial Park, Russellville, Arkansas. The Property has an irregular shape and consists of approximately 60 acres of undeveloped land. The site is vegetated in pasture and native grasses and wooded along the north portion and along natural drainage conveyances. An agricultural pond is located on the eastern portion of the site, and an area void of topsoil with exposed shale is located on the southwest portion of the Property. The site is fenced on the southern border and can be accessed from Tyler Road through a gate on the southwest portion. The Property is fenced, in part, on the east side. An overhead powerline utility easement is located on the northern portion of the Property and runs through the wooded portion of the Property, north of the pond. The JW Aluminum property is fenced and marks, in part, the western boundary of the subject Property.

The Property is bordered to the north by residential property; to the south by residential property then Tyler Road and beyond Tyler Road agricultural property that is zoned commercial. It is bordered to the east by a mobile home park and Rockline Industries and to the west by JW Aluminum.

2.3 Current Use of Property

The Property is currently vacant undeveloped property zoned industrial. According to records from the Pope County Tax Assessor's Office, the Property is currently owned by Arkansas Valley Alliance for Economic Development, Inc.

2.4 Current Use of Adjoining Properties

The area adjoining the Property consists primarily of residential, agricultural, commercial and industrial sites. Adjoining properties are currently developed as follows:

North	Residential
South	Residential then Tyler Road & then Agricultural Zoned Commercial
East	Commercial & Residential – Mobile Home Park & Rockline Industries
West	Industrial – JW Aluminum

2.5 Site Plan

The Site Plan is located in *Appendix B*.

3.0 RECORDS REVIEW

3.1 Physical Setting

3.1.1 Topography

EEG reviewed the 2017 revised United States Geological Survey (USGS) Russellville East 7.5-minute Quadrangle series topographic map for this assessment. The topographic map was compiled from December 2015 aerial photographs. The Property elevation ranges from 480 feet to 420 feet above Mean Sea Level (MSL) and slopes gradually to the west and northwest. The Property is not shown as developed on the topographic map. A copy of the topographic map can be found in *Appendix B* of this report.

3.1.2 Soils

According to the United States Department of Agriculture's Soil Survey of Pope County, Arkansas dated April 1981, the soil classification is as follows:

- The Leadvale Silt Loam consists of deep, moderately well-drained soil found on a 1-3 percent slope. Leadvale Silt Loam soils are low in natural fertility, permeability is moderate and the available water capacity is moderate. The soil formed in loamy sediment derived from sandstone and shale. The soil is listed as hydric based on information reviewed from the Hydric Soils of Arkansas List found at: <http://soils.usda.gov/use/hydric/>
- The Mountainburg Gravelly Fine Sandy Loam consists of shallow, well-drained soil found on a 3-8 percent slope. Mountainburg Gravelly Fine Sandy Loam soils are low in natural fertility, permeability is moderate to high and the available water capacity is low. The soil formed in acid sandstone bedrock. The soil is not listed as hydric based on information reviewed from the Hydric Soils of Arkansas List found at: <http://soils.usda.gov/use/hydric/>

3.1.3 Regional Geology

EEG reviewed data from the Geologic Map of Arkansas produced by the U.S. Geological Survey in 1993 and the State of Arkansas Geologic Survey web site. The Property lies within the Arkansas River Valley. To the north lies the Ozark Plateau and to the south the Ouachita Mountains. All of these regions are within the Interior Highlands of Arkansas. The bedrock underlying the Property is consolidated rock of Pennsylvanian Age. The bedrock is defined as the upper part of the Atoka Formation and consists of alternating beds of sandstone, siltstone and shale. Shale is the most abundant rock type in the area. The Atoka Formation ranges in thickness from less than 1,500 feet to at least 9,400 feet.

3.1.4 Local Hydrology

Based on local topography, groundwater should move in westerly and northwesterly directions at an estimated depth of 10-25 feet. Local features may influence groundwater flow direction; therefore, a complete hydrogeologic investigation would be required to adequately determine groundwater flow direction at the Property.

3.1.5 Flood Zone

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Number 05115C0390E from March 2010 obtained at the FEMA website, www.msc.fema.gov, the subject Property is not in an area subject to flooding.

3.2 Historical Use Information

The Property is currently owned by Arkansas Valley Alliance for Economic Development, Inc. Historically, the Property was agricultural since at least 1937. EEG performed a Phase I Environmental Site Assessment in October 1997 on 100 acres that included the subject Property, EEG Project #98-017. The report referenced a 1937 aerial photograph that indicated that the subject Property was used for agricultural purposes. This 1937 aerial photograph is no longer available at the NRCS office. The Property was platted in 1998 as East End Industrial Park Tract 2. The Property has remained vacant undeveloped land since it was platted and zoned industrial.

The property to the north has been developed for residential use. The property to the south has been developed as residential with industrial beyond that and agricultural zoned commercial beyond that. The property to the east has been developed for commercial and residential use. The property to the west has been developed for industrial use.

Details regarding specific usage of the Property and adjoining properties are presented in subsequent sections.

3.2.1 Aerial Photographs

A search was conducted locally and through a national database company for all readily available aerial photographs. Historical aerial photographs of the Property and vicinity were obtained from the Pope County Soils Book, Pope County NRCS Office, AHTD GIS and Google, to be reviewed for indications of previous uses of the Property and potential sources of contamination in the site area. This review included aerial photographs from 1960, 1976, 1982, 1994, 2001, 2004, 2009, 2014 and 2017.

Representative copies of the 1960, 1976, 1982, 1994, 2001, 2004, 2009 and 2017 aerial photographs reviewed can be found in **Appendix C** of this report. A summary of the aerial photograph review is as follows:

TABLE: AERIAL PHOTOGRAPHS		
Flight (Year) & Scale	Condition/Use	
1960 Unknown	PROPERTY	Agricultural & Undeveloped – Wooded on Northern Portion; Incomplete Coverage on Eastern Portion
	SURROUNDING PROPERTIES	
		North: Undeveloped – Wooded
		South: Agricultural
		East: No Coverage
		West: Agricultural

TABLE: AERIAL PHOTOGRAPHS		
Flight (Year) & Scale	Condition/Use	
1976 Unknown	PROPERTY	Agricultural – Incomplete Coverage on Northern & Eastern Portions
	SURROUNDING PROPERTIES	
		North: No Coverage
		South: Residential & Agricultural
		East: No Coverage
		West: Agricultural

TABLE: AERIAL PHOTOGRAPHS		
Flight (Year) & Scale	Condition/Use	
1982 & 1984 Unknown	PROPERTY	Agricultural & Undeveloped/Extant – Wooded on Northern Portion; Utility Easement Runs Across Northern Portion
	SURROUNDING PROPERTIES	
		North: Residential & Undeveloped – Residential Structures Present by 1994; Wooded
		South: Residential, Agricultural & Wooded
		East: Agricultural
		West: Agricultural

TABLE: AERIAL PHOTOGRAPHS		
Flight (Year) & Scale	Condition/Use	
2001, 2004 & 2009 Unknown	PROPERTY	Industrial/Extant – Lot
	SURROUNDING PROPERTIES	
		North: Residential & Wooded/Extant
		South: Residential, Agricultural & Wooded/Extant
		East: Commercial & Agricultural – Commercial Building Present
		West: Industrial & Agricultural/Extant – JW Aluminum

TABLE: AERIAL PHOTOGRAPHS		
Flight (Year) & Scale	Condition/Use	
2014 & 2017 Unknown	PROPERTY	Industrial/Extant – Lot
	SURROUNDING PROPERTIES	
		North: Residential & Wooded/Extant
		South: Residential, Agricultural & Wooded/Extant
		East: Commercial & Residential/Extant – Rockline Industries & Mobile Home Park
		West: Industrial & Agricultural/Extant – JW Aluminum

3.2.2 Fire Insurance Maps

Sanborn Fire Insurance Maps were historically produced for urban areas and utilized for determining fire hazards. When available, these maps are reviewed for further documentation concerning the historical use of the Property and surrounding area. Sanborn Fire Insurance Maps were not available from Environmental Data Resources, Inc. (EDR) for the Property.

3.2.3 City Directories

City Directories were not available for the Property.

3.2.4 Recorded Land Title Records/Property Tax Files

Tax records available at the Pope County Courthouse Tax Assessor's Office were reviewed for the Property. According to these records, Arkansas Valley Alliance for Economic Development, Inc. is the current owner of the Property.

No environmental easements or liens were identified during the records review.

3.2.5 Chain-of-Title Search

A 60-year chain-of-title search was not provided for this assessment. Historical use of the Property was researched utilizing other standard historical sources.

3.2.6 Other Maps & Data

No other maps or data were reviewed for this assessment.

3.3 Environmental Database Records Review

Environmental Data Resources, Inc. (EDR) conducted a search of available environmental records. The EDR Site Assessment Report meets the regulatory records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-13. Discrepancies may exist between EDR listings and the findings of EEG regarding sites of environmental concern. Federal and state-listed facilities may not be plotted in their correct locations or may be listed as unmapped sites due to inadequate address data that will not allow sites to be correctly geocoded. When discrepancies occur, the findings of EEG's site visit and records review will take precedence over information provided by EDR. Unless described in one or more of the following applicable sections, the unmapped State-listed facilities identified in the EDR Site Assessment Report are located beyond the prescribed search radii. The executive summary from the EDR Site Assessment Report for the Property is included in *Appendix D* of this report. The entire EDR report can be provided on CD upon request and can be made available for 180 days.

The following regulatory information concerning recognized environmental conditions at facilities located within the search radii was reported to EEG by EDR.

3.3.1 Federal Database Records

TABLE: FEDERAL DATABASE RECORDS							
List	AMSD*	On Property	Adjoining Property	<0.125 Mile	0.125 to 0.25 Mile	0.25 to 0.5 Mile	0.5 to 1 Mile
Federal NPL Site List	1.0 mile / 1.6 km	0	0	0	0	0	0
Federal Delisted NPL Site List	0.5 mile / 0.8 km	0	0	0	0	0	
Federal SEMS List	0.5 mile / 0.8 km	0	0	0	0	0	
Federal SEMS-ARCHIVE List	0.5 mile / 0.8 km	0	0	0	0	0	
Federal RCRA CORRACTS Facilities List	1.0 mile / 1.6 km	0	0	0	0	0	0
Federal RCRA Non-CORRACTS TSD Facilities List	0.5 mile / 0.8 km	0	0	0	0	0	
Federal RCRA Generators List	Property & Adjoining Properties	0	1				
Federal Institutional/Engineering Controls Registries	Property	0					
Federal ERNS List	Property	0					
Fuels Program List	0.25 mile / 0.4 km	0	0	0	0		

**Approximate Minimum Search Distance, in miles, pursuant to ASTM E 1527-13, Section 8.2.1*

3.3.1.1 NPL List

The EPA publishes the National Priorities List (NPL) of uncontrolled or abandoned hazardous waste sites that have been identified for priority remedial actions under the Superfund Program. A review of the list indicated the Property was not identified and that no NPL sites exist within a 1-mile radius of the Property.

3.3.1.2 Delisted NPL List

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(3), sites may be deleted from the NPL where no further response is appropriate. A review of the list indicated the Property was not identified and that no delisted NPL sites exist within a 1-mile radius of the Property.

3.3.1.3 SEMS List

EEG also reviewed the EPA's list of known or potential hazardous waste sites within the zip code area of the Property. The SEMS (Superfund Enterprise Management System) list, formerly known as CERCLIS, contains sites which are either proposed to be on or are on the NPL and the sites which are in the screening and assessment phase for possible inclusion on the NPL. A site's presence on the SEMS list in no way infers a level of federal activity at that site, nor does it indicate that hazardous conditions necessarily exist at that location. No SEMS sites were listed within a 0.5-mile radius of the Property.

3.3.1.4 SEMS-ARCHIVE List

The SEMS-ARCHIVE list contains no further interest under the Federal Superfund Program based on available information. The SEMS-ARCHIVE list, formerly known as the CERCLIS-NFRAP, includes sites that have been removed and archived from the inventory of SEMS sites. SEMS-ARCHIVE status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site. No SEMS-ARCHIVE sites were listed within a 0.5-mile radius of the Property.

3.3.1.5 RCRA CORRACTS & Non-CORRACTS TSD Facilities List

EEG reviewed the list of facilities that treat, store or dispose of hazardous waste (TSDs). The EPA under the Resource Conservation and Recovery Act (RCRA) publishes the list. Neither the Property nor properties immediately adjoining the Property were listed as TSD facilities. No RCRA CORRACTS facilities were located within a 1-mile radius of the Property. No RCRA Non-CORRACTS TSD facilities were located within a 0.5-mile radius of the Property.

3.3.1.6 RCRA Generator List

In addition to RCRA TSD facilities, EEG also reviewed the RCRA Program's list of hazardous waste generators. The property to the west of the Property was listed as an RCRA generator facility. Specific details are listed below.

Site Name	Site ID Number	Address	Distance	Direction
JW Aluminum	ARR000004663	777 Tyler Road	Adjoining	West
	58001689			
	JW Aluminum, located on westerly adjoining property at 777 Tyler Road, manufactures specialty flat rolled aluminum products. The facility is listed as an RCRA-CESQG that handles 100 kg or less per calendar month of hazardous ignitable and corrosive waste. No violations have been found. The facility is also listed as an aboveground storage tank (AST) facility with eleven 24,000-gallon gasoline ASTs that were installed in 1996. No underground storage tanks (UST) have been reported. The facility is located down-gradient from the subject Property.			

3.3.1.7 Institutional Control/Engineering Control Registries

The US Institutional Controls Registry 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. The US Engineering Controls Registry 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. The Property was not identified on the Institutional Control/Engineering Control Registries.

3.3.1.8 Emergency Response Notification System (ERNS) List

The ERNS is a national database containing information from spill reports concerning oil and hazardous substances made to federal authorities. The Property was not identified as an ERNS facility.

3.3.1.9 Fuels Program List

The Fuels Program is a national database containing facilities that are registered under the Part 80 (Code of Federal Regulations) EPA Fuels Programs. All companies now are required to submit new and updated registrations. No Fuels Program sites were listed within a 0.25-mile radius of the Property.

3.3.2 State Database Records

TABLE: STATE DATABASE RECORDS							
List	AMSD*	On Property	Adjoining Property	<0.125 Mile	0.125 to 0.25 Mile	0.25 to 0.5 Mile	0.5 to 1 Mile
State Lists of Hazardous Waste Sites Identified for Investigation or Remediation NPL-Equivalent	1.0 mile / 1.6 km	0	0	0	0	0	0
State Lists of Hazardous Waste Sites Identified for Investigation or Remediation SEMS-Equivalent	0.5 mile / 0.8 km	0	0	0	0	0	
Landfill and/or Solid Waste Disposal Site List	0.5 mile / 0.8 km	0	0	0	0	0	
Leaking UST List	0.5 mile / 0.8 km	0	0	0	0	0	
Registered Storage Tank List	Property & Adjoining Property	0	1				
State and Tribal Institutional/Engineering Controls Registries	Property	0					
Voluntary Cleanup Program Sites	0.5 mile / 0.8 km	0	0	0	0	0	
Brownfield Program Sites	0.5 mile / 0.8 km	0	0	0	0	0	

*Approximate Minimum Search Distance, in miles, pursuant to ASTM E 1527-13, Section 8.2.1

3.3.2.1 State Priority List

The State lists facilities that are identified as NPL sites that have been prioritized for funding and those that are identified as State Priority List (SPL) Sites. The Priority List contains sites that have been ranked to receive funding for remedial actions and/or investigation under the Hazardous Substance Remedial Action Trust Fund. A review of the list indicated the Property was not identified and that no SPL sites exist within a 1-mile radius of the Property.

3.3.2.2 SEMS List

EEG also reviewed the State's list of known or potential hazardous waste sites within the zip code area of the Property. The SEMS (Superfund Enterprise Management System) list, formerly known as CERCLIS, contains sites which are either proposed to be on or are on the NPL and the sites which are in the screening and assessment phase for possible inclusion on the NPL. A site's presence on the SEMS list in no way infers a level of federal activity at that site, nor does it indicate that hazardous conditions necessarily exist at that location. No SEMS sites were listed within a 0.5-mile radius of the Property.

3.3.2.3 Landfill and/or Solid Waste Disposal Site List

The State maintains a list of facilities permitted as solid waste landfills, incinerators or transfer stations. No permitted landfill and/or solid waste disposal sites were identified within a 0.5-mile radius of the Property.

3.3.2.4 LUST Site List

Reported leaks from underground storage tanks are compiled by the State in a leaking underground storage tank (LUST) database. Neither the Property nor its adjoining properties are listed as LUST sites. No listed LUST sites were identified within a 0.5-mile radius of the Property.

3.3.2.5 Registered Storage Tank Site List

The State regulates and maintains a list of registered underground storage tank (UST) facilities that may include aboveground storage tanks (AST). At least one registered storage tank was identified on the Property or on an adjoining Property. Specific details are as follows.

Site Name	Site ID Number	Address	Distance	Direction
JW Aluminum	ARR000004663	777 Tyler Road	Adjoining	West
	58001689			
	JW Aluminum, located on westerly adjoining property at 777 Tyler Road, is a registered storage tank site. See Section 3.3.1.6 above for details.			

3.3.2.6 Institutional Control/Engineering Control Registries

The ADEQ Institutional Controls Registry 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. The ADEQ Engineering Controls Registry 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. The Property was not identified on the Institutional Control/Engineering Control Registries.

3.3.2.7 Voluntary Cleanup Site

Voluntary Cleanup Program Sites are compiled by the State in a voluntary cleanup program site (VCP) database. Neither the Property nor its adjoining properties are listed as VCP sites. No listed VCP sites were identified within a 0.5-mile radius of the Property.

3.3.2.8 Brownfield Site

Brownfield Projects are compiled by the State in a Brownfield database. Neither the Property nor its adjoining properties are listed as Brownfield sites. No listed Brownfield sites were identified within a 0.5-mile radius of the Property.

3.3.3 High Risk Historical Records

The following databases fall within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns but may not show up in current government records searches.

TABLE: STATE DATABASE RECORDS						
List	On Property	Adjoining Property	<0.125 Mile	0.125 to 0.25 Mile	0.25 to 0.5 Mile	0.5 to 1 Mile
EDR Manufactured Gas Plant	0	0	0	0		
EDR US Historical Auto Station	0	0	0	0		
EDR US Historical Cleaners	0	0	0	0		

3.3.3.1 Historical Manufactured Gas Plant (MGP)

Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

A review of the list indicated the Property was not identified and that no Historical Manufactured Gas Plant sites exist within a 1-mile radius of the Property.

3.3.3.2 Historical Auto Stations

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc.

Neither the Property nor its adjoining properties are listed as a Historical Auto Station site. No listed Historical Auto Station sites were identified within a 0.25-mile radius of the Property.

3.3.3.3 Historical Dry Cleaners

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to, dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry, etc.

Neither the Property nor its adjoining properties are listed as a Historical Dry Cleaners site. No listed Historical Dry Cleaners sites were identified within a 0.25-mile radius of the Property.

A review of the list of unmapped sites indicated that none of the unmapped sites appeared to be within the appropriate AMSD.

3.4 Summary of Prior ESAs & Environmental Checklists

EEG performed a Phase I Environmental Site Assessment in October 1997, EEG Project #98-017, on 100 acres that included the subject Property. This report was used as a reference during the current investigation. No recognized environmental conditions were sited either on the Property or on surrounding properties. The report stated the following.

“The previous use of the subject site and its adjacent properties appeared to be vacant pastureland and commercial property with no apparent land use problems.”

The report referenced a 1937 aerial photograph that indicated that the subject Property was used for agricultural purposes. This 1937 aerial photograph is no longer available at the NRCS office.

4.0 PROPERTY RECONNAISSANCE & INTERVIEWS

A site visit was performed by Mr. Keith Zimmerman, Environmental Professional, on June 8, 2018. The observations noted in this report apply to the site as they appeared on that day. As part of this investigation, EEG performed a walk-through investigation of the site and visually evaluated the exterior of the properties adjoining the Property. The inspector was unaccompanied during the site investigation. The weather at the time of the site visit was partly cloudy and approximately 91 degrees Fahrenheit. EEG visually and/or physically observed all areas of the site from the adjoining property boundaries and by walking and driving the Property.

4.1 General Property Characteristics

4.1.1 Solid Waste Disposal

No solid waste is generated at the Property. No dumping was observed on the Property.

4.1.2 Sewage Discharge & Disposal

Sanitary sewage is not generated at the Property.

4.1.3 Surface Water Drainage

Storm water collecting on the Property is absorbed into the ground and flows across the Property in a northwesterly direction, exiting the Property onto adjoining property via a stormwater drainage conveyance.

4.1.4 Heating & Cooling

No buildings exist on the Property.

4.1.5 Wells & Cisterns

EEG did not observe any evidence of wells or cisterns on the Property.

4.1.6 Wastewater

Industrial wastewater is not generated on the Property.

4.1.7 Additional Property Observations

No additional relevant property characteristics were observed.

4.2 Environmental Hazards

4.2.1 Hazardous Substances & Petroleum Products Usage

No hazardous substances or petroleum products are used or stored at the Property.

4.2.2 Containers & Drums

No containers or drums were observed on the Property.

4.2.3 Disposal Locations of Regulated/Hazardous Wastes

No hazardous or biohazardous waste was found at the Property.

- 4.2.4 Stained Soil or Stressed Vegetation
EEG observed no evidence of release exemplified by stained ground cover or stressed vegetation.
- 4.2.5 Landfills
No landfill activities were identified on the Property.
- 4.2.6 Pits, Lagoons, Sumps, Floor Drains, Drywells & Catch Basins
EEG did not identify any evidence of pits, sumps, drywells or catch basins on the Property.
- 4.2.7 On-site Storage Tanks
Historically, underground storage tanks (USTs) and aboveground storage tanks (ASTs) have been documented as being point sources for surface and subsurface contamination. Corrosion of tank materials and improper filling procedures are factors known to contribute to soil and possible groundwater contamination. Determining the presence and locations of USTs and ASTs as part of this investigation is considered essential in assessing this potential contamination source. Visual inspection of the Property included investigation of the site to identify possible indicators associated with USTs and ASTs such as leakage and vegetative distress. Review of tank registration records and visual inspection of the property are conducted to determine the possible existence of USTs and ASTs in the vicinity of the Property. It must be noted, however, that a lack of registration records and the absence of certain physical site conditions or characteristics may restrict or prevent the definite determination regarding the presence, number of and contents of USTs and ASTs possibly located at the Property.
- 4.2.7.1 Aboveground Storage Tanks
No ASTs were identified on the Property.
- 4.2.7.2 Underground Storage Tanks
No USTs were identified on the Property.
- 4.2.8 Polychlorinated Biphenyls (PCBs)
Environmental Protection Agency (EPA) Rule 40 CFR Part 761 states in part that the owner of equipment contaminated with polychlorinated biphenyls (PCBs), such as electrical transformers, is responsible for any environmental liabilities caused by PCB contamination of the environment through leakage, fires, etc. PCB transformer owners must register the transformers with owners of all buildings located within 30 meters of the PCB transformer. A PCB transformer is one containing 500 or more parts per million (ppm) of PCBs. However, if PCB content is unknown (untested by laboratory), the transformers must be considered PCB-contaminated (50 – 499 ppm).

Each large low-voltage capacitor, small capacitor normally used in alternating current circuits and fluorescent light ballast manufactured between July 1, 1978, and July 1, 1988, that does not contain PCBs must be marked by the manufacturer with the statement, "No PCBs." This marking must be placed in a position on the exterior of the item so that any person inspecting or servicing the item can easily read it.

No PCB containing objects were observed on the Property.

4.2.9 Additional Property Hazard Observations

No additional hazards were observed on the Property.

4.2.10 Adjoining Property Hazard Observations

No additional hazards were observed on the adjoining properties.

4.3 Interviews

EEG conducted representative interviews with Suzy Griffin and Bill Clark. The interviews were conducted to determine if the individuals were aware of any recognized environmentally related problems or concerns at the Property. Specific information obtained from the noted individuals appears in the appropriate sections of this report.

An interview was conducted on June 15, 2018, with Ms. Suzy Griffin, Executive Vice President of River Valley Economic Development. Ms. Griffin stated that the Property is maintained by River Valley Economic Development. According to Ms. Griffin, the Property is gated; therefore, dumping on the Property is not an issue. She indicated that the Property is bushhogged about twice per year. According to Ms. Griffin, no known environmental problems exist currently on the Property.

An interview was conducted on June 18, 2018, with Mr. Bill Clark, Code Enforcer for City of Russellville. Mr. Clark indicated that he is not aware of any dumping on the Property. He indicated that he has not inspected the Property since there have been no dumping complaints. According to Mr. Clark, no known environmental problems exist currently on the Property.

4.4 User Provided Information

The AAI questions that require completion by the user are outlined in a User Questionnaire that was provided to the client during this Phase I ESA project. In summary, the User Questionnaire includes AAI questions pertaining to environmental cleanup liens, activity use and limitation records (AULs) such as Institutional Controls, specialized knowledge or experience of the person seeking to qualify for the LLP, relationship of the purchase price to the fair market value of the property if it were not contaminated, commonly known or reasonably ascertainable information about the property and the degree of obviousness of the presence of likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation.

The Client has not reported to EEG the presence of any environmental liens currently recorded against the Property. A User Questionnaire, as outlined in ASTM E1527 -13 X3, is included in **Appendix G** and was completed by Ms. Suzy Griffin of River Valley Economic Development on June 18, 2018; any information obtained from the questionnaire appears in the appropriate sections of this report.

4.5 Non-Scope Services

4.5.1 Asbestos-Containing Materials (ACM)

Asbestos is a general term applied to a wide variety of naturally occurring fibrous minerals. Historically, asbestos remained a curiosity for centuries, with negligible production until the beginning of the twentieth century when it was used as thermal insulation for steam engines and as an ingredient in building materials. Because asbestos is strong, incombustible and corrosion-resistant, it was widely used in buildings constructed prior to 1975. Asbestos was used in over 3,000 types of construction materials.

Unfortunately, the unique physical characteristics of asbestos that make it a good building material are the same characteristics that make it harmful. When inhaled in sufficient quantities, asbestos fibers can cause serious health problems. Although many substances are listed as suspected carcinogens, asbestos is one of the few substances that are a proven carcinogen. For these reasons, federal, state and local governments now regulate the use and removal of ACM.

No buildings exist on the Property; therefore, potential asbestos-containing materials were not addressed as a part of this assessment.

4.5.2 Radon

Radon is an invisible, odorless, radioactive gas produced by the decay of uranium in rock and soil. Radon gas enters a building through cracks in the foundation, areas surrounding drainage pipes, and other openings in the foundation and walls. Buildings with basements and concrete slab foundations are more susceptible to elevated radon gas levels. The radon decay products, once inside a building, may become attached to dust particles and inhaled, or the decayed radioactive particles alone may be inhaled and cause damage to lung tissue.

Radon is measured in picocuries per liter of air (pCi/L). The EPA has established the recommended safe radon level at 4 pCi/L. Long-term and short-term monitoring devices are available for radon level detection.

EEG reviewed Area Radon Information as presented in the EDR report. Pope County, Arkansas, is identified as being located within EPA Radon Zone 3, which indicates that indoor average levels in Zone 3 are less than 2.0 pCi/L. The EDR report noted that 53 sites within the Property zip code of 72801 have been tested. The average indoor levels of radon were 1.015 pCi/L on the first floor and 5.933 pCi/L in the basement.

If more information is needed regarding prevalent radon levels, further investigation will be required. Such investigation may include short-term and/or long-term testing for radon inside existing on-site structures or future construction on the subject Property.

4.5.3 Lead-Based Paint

No buildings exist on the Property. Therefore, lead-based paint was not an issue.

4.5.4 Lead in Drinking Water

According to the 2017 Annual Water Quality Report obtained from the City Corporation website (www.citycorporation.com/reports.htm), the municipal water supply in the City of Russellville is within state and federal standards regarding lead in drinking water.

4.5.5 Wetlands

According to the U.S. Fish and Wildlife National Wetlands Inventory Data Mapper website <http://www.fws.gov/wetlands/Data/Mapper.html>, wetlands are present on the Property. The wetland is illustrated as Palustrine, Unconsolidated Bottom, Permanently Flooded, Diked/Impounded (PuBHh). This designation is for the agricultural pond located on the eastern portion of the Property. Ponds are typically considered artificial wetlands. It is EEG's opinion, based on this designation, it is unlikely limitations on development would exist. If additional information is needed regarding potential wetlands, a thorough wetland delineation of the Property prior to development or disturbance of the areas will be required. **Figure 4** in **Appendix B** represents the wetland classification from the U.S. Fish and Wildlife National Wetlands Inventory Data Mapper website.

5.0 EVALUATION: FINDINGS, OPINIONS & CONCLUSIONS

5.1 Findings

- An adjoining property is listed as an RCRA-CESQG and an AST facility.
- A pond is located on the Property.

5.1.1 On-Site Environmental Conditions

No recognized environmental conditions were identified on the Property.

5.1.2 Off-Site Environmental Conditions

No off-site environmental conditions were identified as recognized environmental conditions in connection with the Property.

5.2 Opinions

JW Aluminum, located on westerly adjoining property at 777 Tyler Road, manufactures specialty flat rolled aluminum products. The facility is listed as an RCRA-CESQG that handles 100 kg or less per calendar month of hazardous ignitable and corrosive waste. No violations have been found. The facility is also listed as an aboveground storage tank (AST) facility with eleven 24,000-gallon gasoline ASTs that were installed in 1996. No underground storage tanks (UST) have been reported. The facility is located down-gradient from the subject Property and is not considered a recognized environmental condition to the subject Property.

According to the U.S. Fish and Wildlife National Wetlands Inventory Data Mapper website <http://www.fws.gov/wetlands/Data/Mapper.html>, wetlands are present on the Property. The wetland is illustrated as Palustrine, Unconsolidated Bottom, Permanently Flooded, Diked/Impounded (PuBHh). This designation is for the agricultural pond located on the eastern portion of the Property. Ponds are typically considered artificial wetlands. It is EEG's opinion, based on this designation, it is unlikely limitations on development would exist. If additional information is needed regarding potential wetlands, a thorough wetland delineation of the Property prior to development or disturbance of the areas will be required. **Figure 4** in **Appendix B** represents the wetland classification from the U.S. Fish and Wildlife National Wetlands Inventory Data Mapper website.

5.3 Conclusions

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of Tract 2 of East End Industrial Park located in Russellville, Pope County, Arkansas, the Property. Any exceptions to or deletions from this practice are described in Section 1.4 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the Property.

6.0 CONSULTANT INFORMATION

6.1 Project Personnel

Site work and research for this Phase I ESA was conducted by the following:



Mr. Keith Zimmerman, P.G.
Environmental Professional

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

6.2 Report Certification

I certify that this assessment was performed under my direction and supervision, that I have reviewed and approved the report, and that the methods and procedures employed in the development of the report to conform to industry standards.



Mr. Keith Zimmerman, P.G.
President/Senior Project Manager

6.3 Report Reliance

This assessment was performed at the request of the Client utilizing methods and procedures consistent with good commercial and customary practice designed to conform to acceptable industries standards. The independent conclusions represent EEG's best professional judgment based on the conditions that existed and the information and data available to us during the course of this assignment. Factual information regarding operations, conditions and test data provided by the Client, owner, or their representative has been assumed to be correct and complete. The report may be distributed and relied upon by the Client, its successors and assigns. Reliance on the information and conclusions presented in this report by any other party(ies) is not authorized by EEG.

Appendix

Appendix A

Scope of Work

ENVIRONMENTAL ENTERPRISE GROUP, INC.

PHASE I ENVIRONMENTAL SITE ASSESSMENTS

Each Phase I Environmental Site Assessment is performed in accordance with the standards set forth in ASTM Designation E 1527-13 and the following Scope of Work Summary. EEG will also perform these assessments according to specific lending institution guidelines when applicable.

Purpose and Scope of Work

The purpose of a Phase I Environmental Site Assessment is to review past and present land-use practices to identify recognized environmental conditions at the site. The qualitative assessment will be accomplished by, and limited to, a review of presently and readily available information regarding past and current land use for indications of the manufacture, generation, use, storage and/or disposal of hazardous substances at the site, and site reconnaissance to observe existing site conditions.

Specifically, the scope of work entails:

- 1) Performing a site visit to identify any obvious visual signs of contamination. (It is important that EEG is allowed access to all portions of the subject property, including storage area(s), and basement(s), if applicable. If access is unavailable to any portion of the subject property, EEG's ability to complete the scope of services described herein may be hindered);
- 2) Investigation of past and present land use. (Should past use dictate, review of previous site usage to identify the possibility of on-site release or disposal of manufacturing or other waste);
- 3) Investigation of adjacent land use and possible source(s) of contamination;
- 4) Review of pertinent readily available documents and maps regarding geologic and hydrogeologic conditions for the site;
- 5) Review and interpretation of available historical aerial photographs of the site and vicinity and provide representative copies of the photographs reviewed;
- 6) Review of existing facility for potential PCB or PCB-contained electrical equipment (if applicable);
- 7) Review county, state, and U.S. Environmental Protection Agency (EPA) lists of known or potential hazardous waste sites or landfills and sites currently under investigation for environmental violations;
- 8) Conduct inquiries to applicable municipal, county, and state regulatory agencies for information regarding building or environmental permits, environmental violations or incidents and/or status of enforcement actions at the subject property;
- 9) Conduct interviews, if appropriate, with subject property owner or manager and maintenance personnel, if available, to evaluate site history and operation and maintenance procedures;
- 10) Non-Scope Services: Review facility for potential presence of Asbestos-Containing Building Materials, Radon, Lead-Based Paint, Lead-in-Drinking-Water, and potential Wetlands; and,
- 11) Prepare a report of findings of the above investigation including color photographic documentation of the subject site and site maps. The report does not include a recommendation to perform a Phase II Environmental Site Assessment to evaluate environmental concerns or recognized environmental conditions disclosed during Phase I. Phase II typically includes but is not limited to, additional sampling and analysis of water, soil and electrical equipment fluid.

Appendix B

Figures



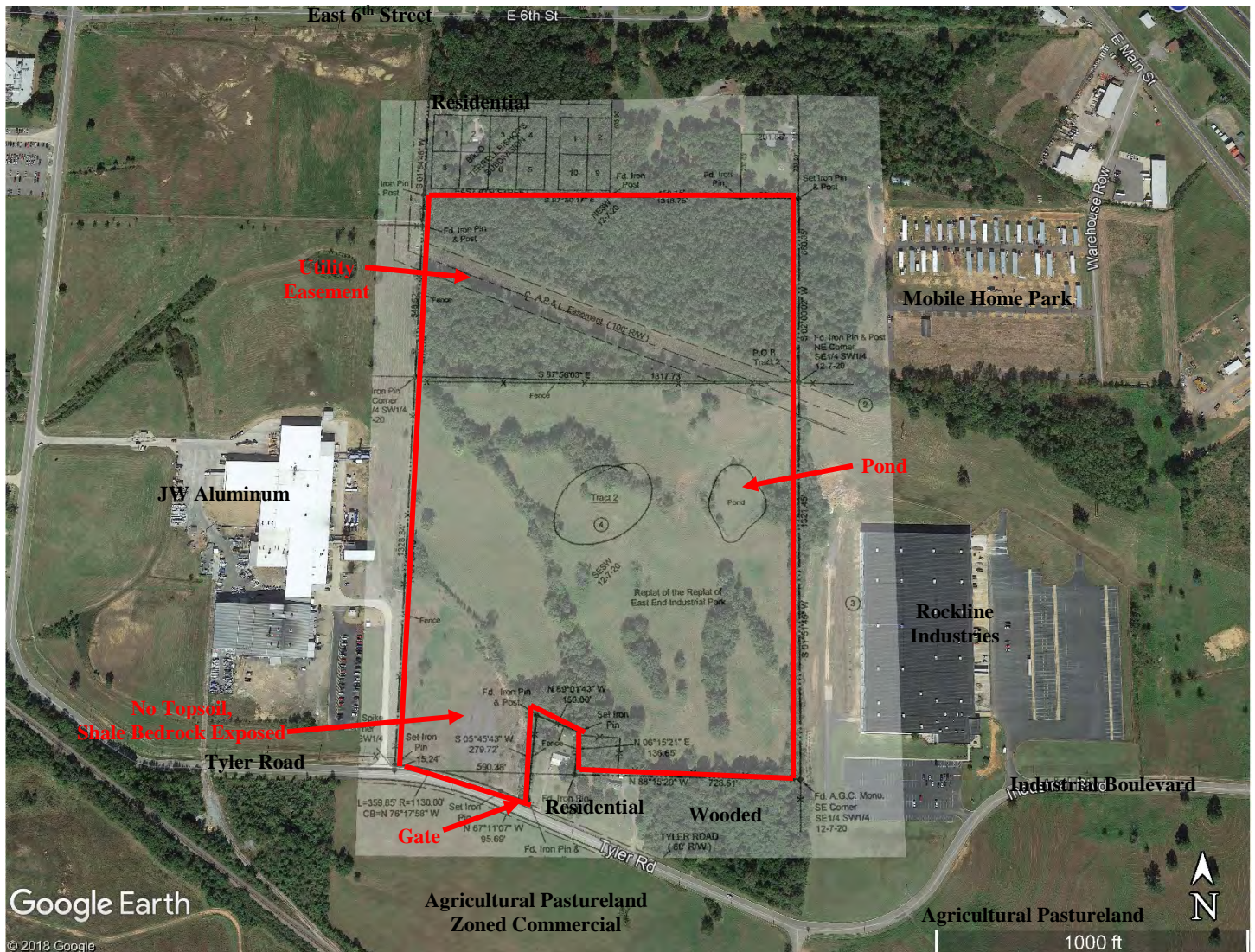
Figure 1: 2017 Russellville East Topographic Map

TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS

EEG Project #18-0115-019

EEG
Environmental
Enterprise Group, Inc.

www.eegonline.com



2014 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

EEEG
**Environmental
Enterprise Group, Inc.**

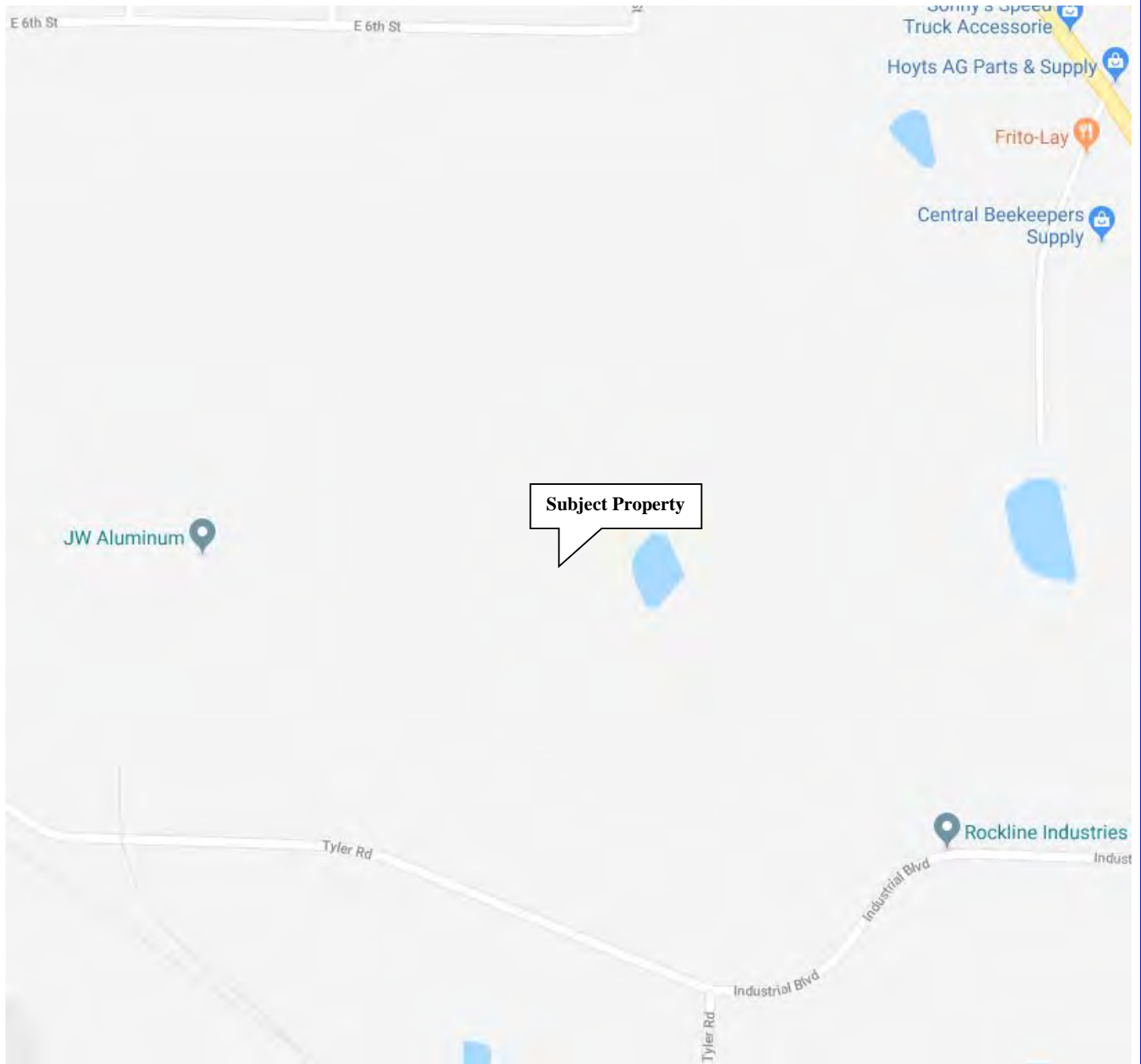
Project Number:

18-0115-019

Figure:

2

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**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

18-0115-019

Figure:

3

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Wetlands Map

According to U.S. Fish and Wildlife Service Website <https://www.fws.gov/wetlands/Data/Mapper.html>,

"PUBHh" means wetland is Palustrine (P), Unconsolidated Bottom (UB), Permanently Flooded (H), and diked/impounded (h)

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

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Project Number:

18-0115-019

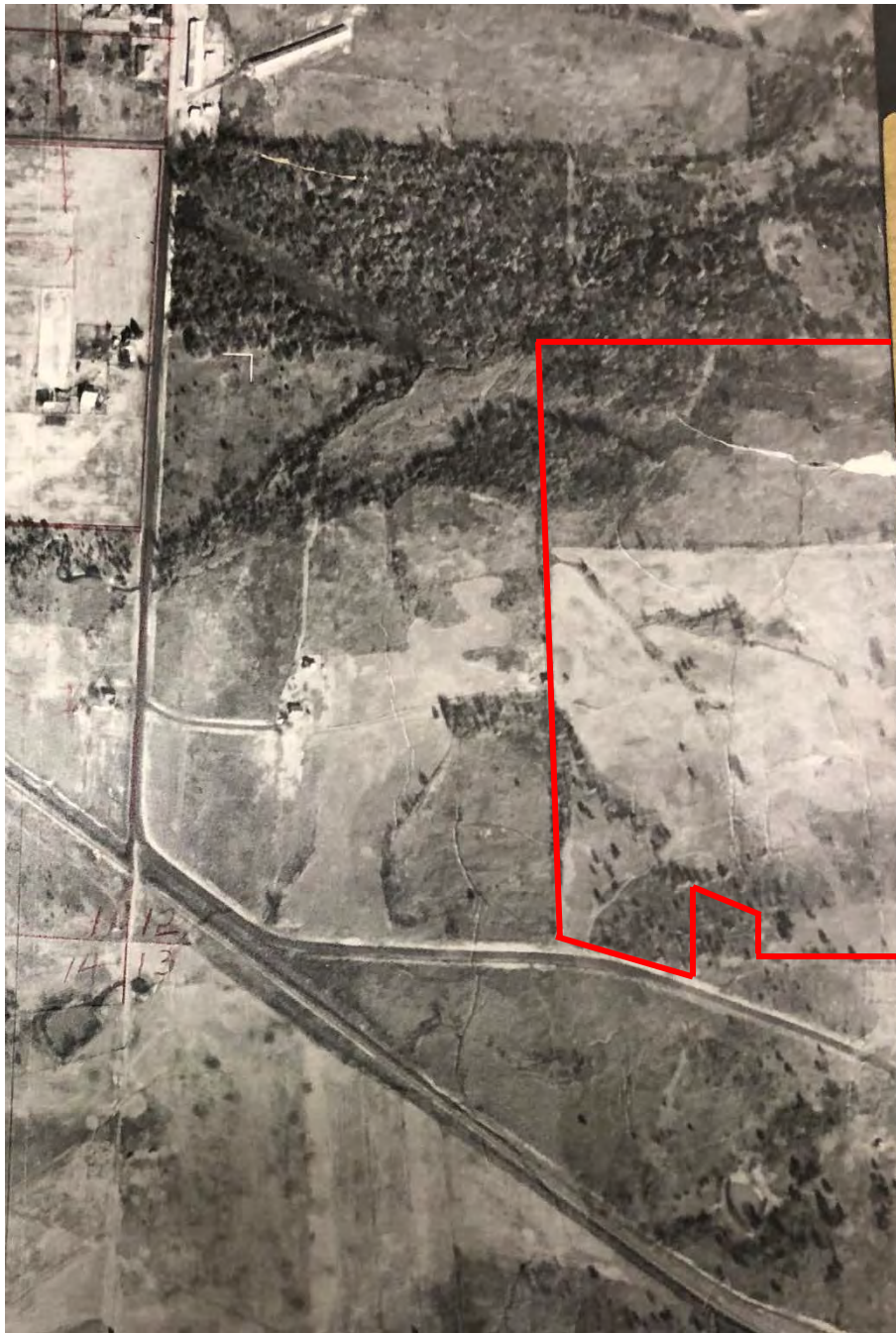
Figure:

4

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Appendix C

Historical Maps and Photographs



1960 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

18-0115-019

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1976 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

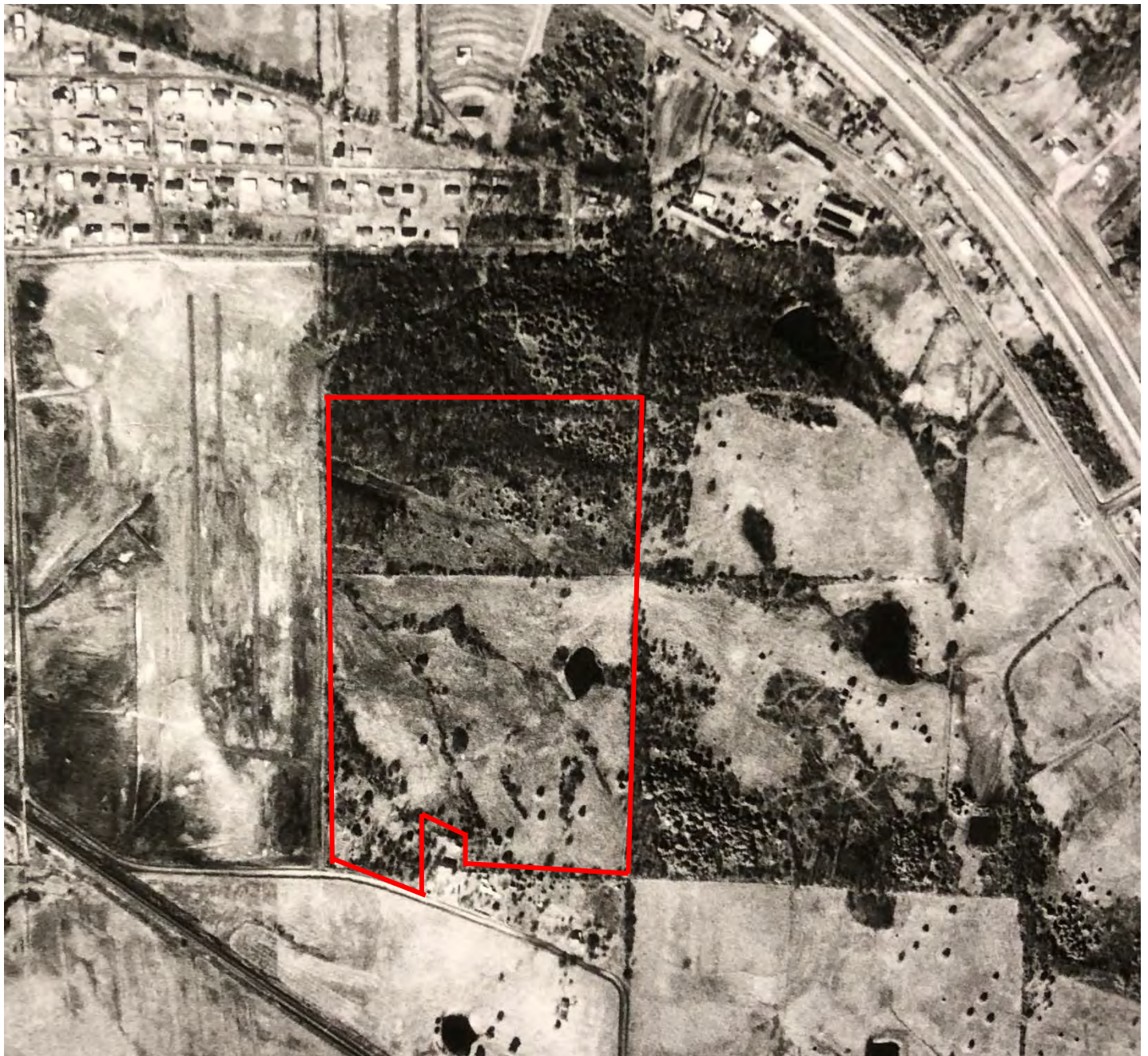
18-0115-019

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1982 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

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1994 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

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2001 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

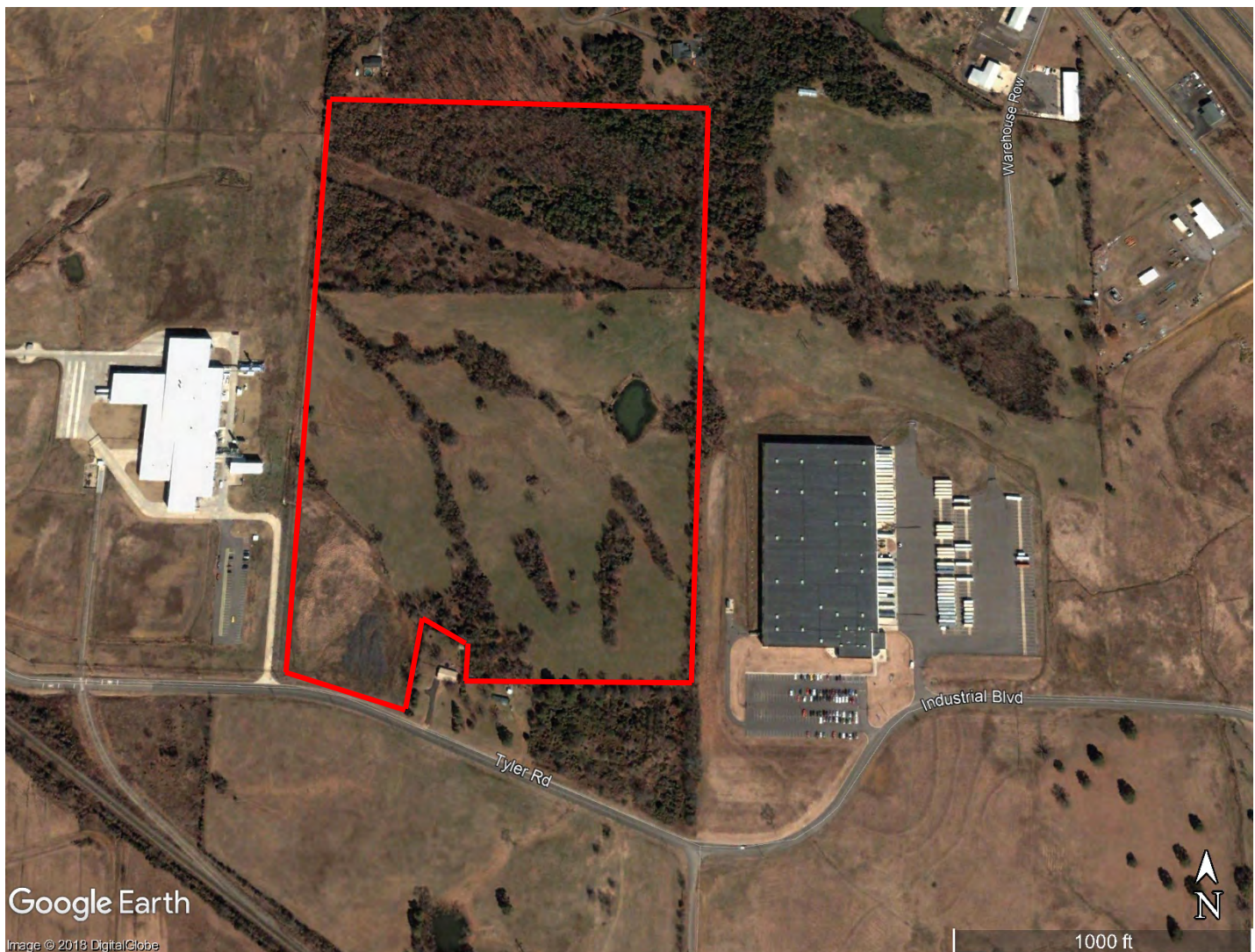
18-0115-019

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2004 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

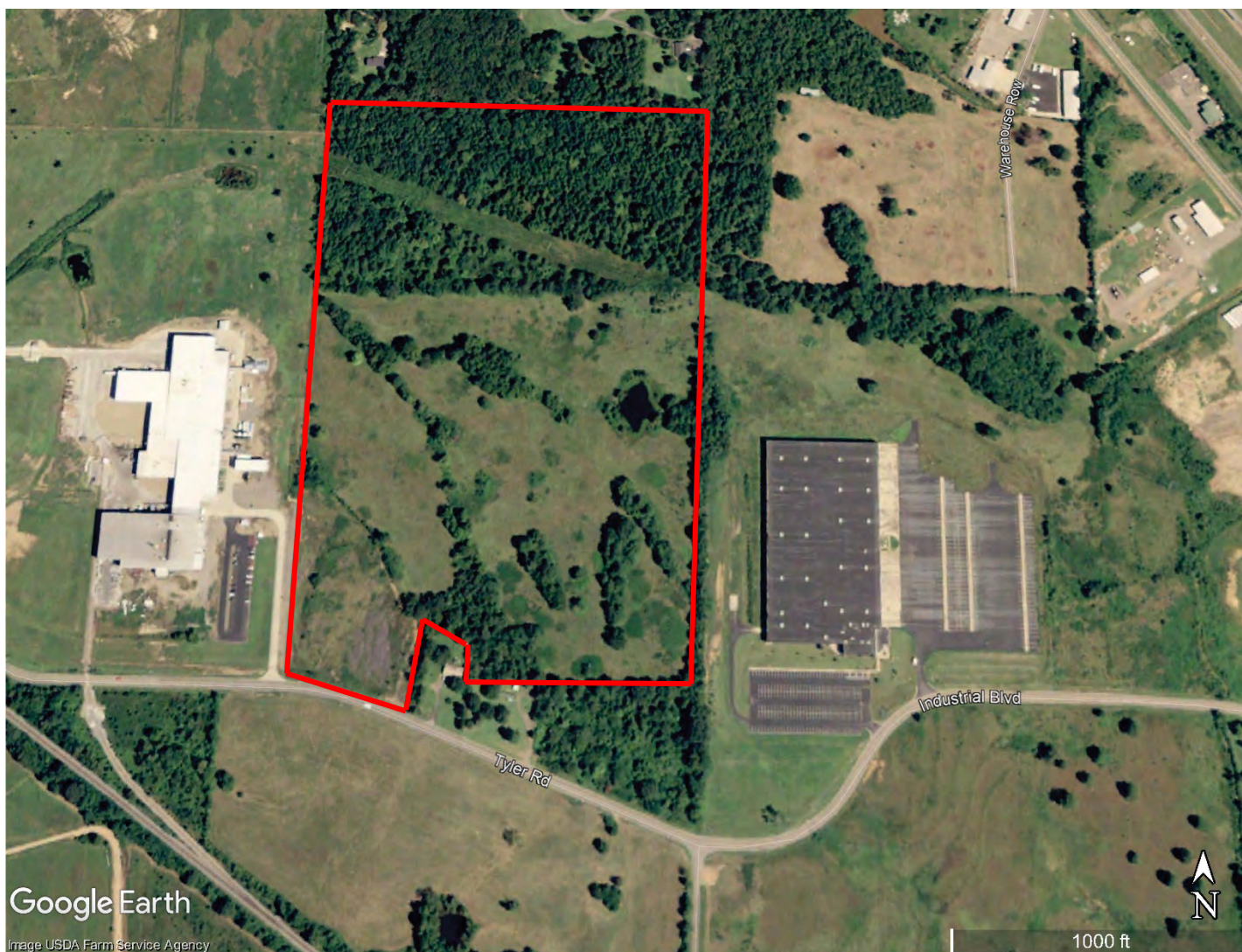
18-0115-019

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2009 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

18-0115-019

Appendix:

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2017 Aerial Photograph

— Approximate Property Boundary

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

Project Number:

18-0115-019

Appendix:

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Appendix D

Environmental Database Research

18-0115-019

Vacant Industrial Property

S12-T7N-R20W

Russellville, AR 72802

Inquiry Number: 5326371.2s

June 08, 2018

The EDR Radius Map™ Report with GeoCheck®



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13), the ASTM Standard Practice for Environmental Site Assessments for Forestland or Rural Property (E 2247-16), the ASTM Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (E 1528-14) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

S12-T7N-R20W
RUSSELLVILLE, AR 72802

COORDINATES

Latitude (North):	35.2620180 - 35° 15' 43.26"
Longitude (West):	93.0765750 - 93° 4' 35.67"
Universal Transverse Mercator:	Zone 15
UTM X (Meters):	493034.6
UTM Y (Meters):	3901904.8
Elevation:	476 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map:	6064095 RUSSELLVILLE EAST, AR
Version Date:	2014
South Map:	6065189 HOLLA BEND, AR
Version Date:	2014

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from:	20151020, 20150717
Source:	USDA

MAPPED SITES SUMMARY

Target Property Address:
S12-T7N-R20W
RUSSELLVILLE, AR 72802

Click on Map ID to see full detail.

MAP ID	SITE NAME	ADDRESS	DATABASE ACRONYMS	RELATIVE ELEVATION	DIST (ft. & mi.) DIRECTION
A1	ROCKLINE INDUSTRIES,	500 INDUSTRIAL BLVD	FINDS, ECHO	Lower	959, 0.182, ENE
A2	ROCKLINE INDUSTRIES,	500 INDUSTRIAL BLVD	PERMITS	Lower	959, 0.182, ENE
B3	BUBBUS MOBILE HOME P	400 BLOCK OF WAREHOS	PERMITS	Lower	2150, 0.407, NNE
B4	BUBBUS MOBILE HOME P	400 BLOCK OF WAREHOS	FINDS	Lower	2150, 0.407, NNE
C5	AMERICOLD LOGISTICS	203 INDUSTRIAL BLVD	SPILLS, TIER 2	Lower	2509, 0.475, ESE
C6		203 INDUSTRIAL BLVD	ERNS	Lower	2509, 0.475, ESE
C7	AMERICOLD, RUSSELLEV	203 INDUSTRIAL BLVD	RMP	Lower	2509, 0.475, ESE
C8	AMERICOLD, RUSSELLEV	203 INDUSTRIAL BLVD	FINDS	Lower	2509, 0.475, ESE
C9	CARMAR VALLEY	203 INDUSTRIAL BLVD	FINDS, ECHO	Lower	2509, 0.475, ESE
C10	RUSSELLEVILLE VALLEY	203 INDUSTRIAL BLVD	RMP	Lower	2509, 0.475, ESE
C11	AMERICOLD LOGISTICS	203 INDUSTRIAL BLVD	RMP	Lower	2509, 0.475, ESE
D12	RELIANT ENERGY INC	4408 E MAIN ST	EDR Hist Auto	Lower	2699, 0.511, NE
D13	ARKLA ENERGY RESOURC	HIGHWAY 64 EST & POL	UST, PERMITS	Higher	2753, 0.521, NE
14	ROAD RUNNER #49	I-40 & COVE	UST, PERMITS	Higher	3002, 0.569, NE
E15	JW ALUMINUM	777 TYLER RD	RCRA-CESQG	Lower	3302, 0.625, NW
E16	J W ALUMINUM COMPANY	777 TYLER ROAD	AST	Lower	3302, 0.625, NW

EXECUTIVE SUMMARY

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
NPL LIENS..... Federal Superfund Liens

Federal Delisted NPL site list

Delisted NPL..... National Priority List Deletions

Federal CERCLIS list

FEDERAL FACILITY..... Federal Facility Site Information listing
SEMS..... Superfund Enterprise Management System

Federal CERCLIS NFRAP site list

SEMS-ARCHIVE..... Superfund Enterprise Management System Archive

Federal RCRA CORRACTS facilities list

CORRACTS..... Corrective Action Report

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

Federal RCRA generators list

RCRA-LQG..... RCRA - Large Quantity Generators
RCRA-SQG..... RCRA - Small Quantity Generators

Federal institutional controls / engineering controls registries

LUCIS..... Land Use Control Information System
US ENG CONTROLS..... Engineering Controls Sites List
US INST CONTROL..... Sites with Institutional Controls

EXECUTIVE SUMMARY

State- and tribal - equivalent NPL

SHWS..... Hazardous Substance Remedial Action Trust Fund Priority List

State and tribal landfill and/or solid waste disposal site lists

SWF/LF..... Solid Waste Facility Permit Database
SWID..... Solid Waste Illegal Dumps Database

State and tribal leaking storage tank lists

LTANKS..... Leaking Storage Tank Location Listing
INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

State and tribal registered storage tank lists

FEMA UST..... Underground Storage Tank Listing
INDIAN UST..... Underground Storage Tanks on Indian Land

State and tribal institutional control / engineering control registries

ENG CONTROLS..... Engineering Controls Sites Listing
INST CONTROL..... Institutional Control/Land Use Restriction Sites

State and tribal voluntary cleanup sites

INDIAN VCP..... Voluntary Cleanup Priority Listing
VCP..... Voluntary Cleanup Program Sites

State and tribal Brownfields sites

BROWNFIELDS..... Brownfields Projects

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS..... A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

SWRCY..... Recycling Directory
INDIAN ODI..... Report on the Status of Open Dumps on Indian Lands
DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations
ODI..... Open Dump Inventory
IHS OPEN DUMPS..... Open Dumps on Indian Land

Local Lists of Hazardous waste / Contaminated Sites

US HIST CDL..... Delisted National Clandestine Laboratory Register
CDL..... Methamphetamine Contaminated Properties Listing
US CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

EXECUTIVE SUMMARY

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System
 SPILLS 90..... SPILLS 90 data from FirstSearch
 SPILLS 80..... SPILLS 80 data from FirstSearch

Other Ascertainable Records

RCRA NonGen / NLR..... RCRA - Non Generators / No Longer Regulated
 FUDS..... Formerly Used Defense Sites
 DOD..... Department of Defense Sites
 SCRDRYCLEANERS..... State Coalition for Remediation of Drycleaners Listing
 US FIN ASSUR..... Financial Assurance Information
 EPA WATCH LIST..... EPA WATCH LIST
 2020 COR ACTION..... 2020 Corrective Action Program List
 TSCA..... Toxic Substances Control Act
 TRIS..... Toxic Chemical Release Inventory System
 SSTs..... Section 7 Tracking Systems
 ROD..... Records Of Decision
 RAATS..... RCRA Administrative Action Tracking System
 PRP..... Potentially Responsible Parties
 PADS..... PCB Activity Database System
 ICIS..... Integrated Compliance Information System
 FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
 MLTS..... Material Licensing Tracking System
 COAL ASH DOE..... Steam-Electric Plant Operation Data
 COAL ASH EPA..... Coal Combustion Residues Surface Impoundments List
 PCB TRANSFORMER..... PCB Transformer Registration Database
 RADINFO..... Radiation Information Database
 HIST FTTS..... FIFRA/TSCA Tracking System Administrative Case Listing
 DOT OPS..... Incident and Accident Data
 CONSENT..... Superfund (CERCLA) Consent Decrees
 INDIAN RESERV..... Indian Reservations
 FUSRAP..... Formerly Utilized Sites Remedial Action Program
 UMTRA..... Uranium Mill Tailings Sites
 LEAD SMELTERS..... Lead Smelter Sites
 US AIRS..... Aerometric Information Retrieval System Facility Subsystem
 US MINES..... Mines Master Index File
 ABANDONED MINES..... Abandoned Mines
 UXO..... Unexploded Ordnance Sites
 DOCKET HWC..... Hazardous Waste Compliance Docket Listing
 FUELS PROGRAM..... EPA Fuels Program Registered Listing
 AIRS..... Permitted Facility Emission & Stack Data
 ASBESTOS..... Asbestos Notification of Intent Database
 COAL ASH..... Coal Ash Disposal Site Listing
 ENF..... Consent Administrative Order, Notice of Violation Information Database
 Financial Assurance..... Financial Assurance Information Listing
 AR Sludge..... Poultry Sludge Permit Sites
 UIC..... Underground Injection Wells Database Listing

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP..... EDR Proprietary Manufactured Gas Plants

EXECUTIVE SUMMARY

EDR Hist Cleaner..... EDR Exclusive Historical Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS..... Recovered Government Archive State Hazardous Waste Facilities List
RGA LF..... Recovered Government Archive Solid Waste Facilities List
RGA LUST..... Recovered Government Archive Leaking Underground Storage Tank

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property. Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

STANDARD ENVIRONMENTAL RECORDS

Federal RCRA generators list

RCRA-CESQG: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

A review of the RCRA-CESQG list, as provided by EDR, and dated 12/11/2017 has revealed that there is 1 RCRA-CESQG site within approximately 0.75 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
JW ALUMINUM	777 TYLER RD	NW 1/2 - 1 (0.625 mi.)	E15	61

Federal ERNS list

ERNS: The Emergency Response Notification System records and stores information on reported releases of oil and hazardous substances. The source of this database is the U.S. EPA.

A review of the ERNS list, as provided by EDR, and dated 01/16/2018 has revealed that there is 1 ERNS site within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
Not reported	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C6	27

EXECUTIVE SUMMARY

State and tribal registered storage tank lists

UST: RST Owner & Facilities.

A review of the UST list, as provided by EDR, and dated 03/19/2018 has revealed that there are 2 UST sites within approximately 0.75 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ARKLA ENERGY RESOURC Tank Status: PO Facility Id: 58000005 Facility Id: 58000005 ADEQ Facility ID: 58-00501	HIGHWAY 64 EST & POL	NE 1/2 - 1 (0.521 mi.)	D13	50
ROAD RUNNER #49 Tank Status: PO Facility Id: 58000130 Facility Id: 58000130 ADEQ Facility ID: 58-00614	I-40 & COVE	NE 1/2 - 1 (0.569 mi.)	14	56

AST: Aboveground Tank Database

A review of the AST list, as provided by EDR, and dated 03/19/2018 has revealed that there is 1 AST site within approximately 0.75 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
J W ALUMINUM COMPANY Facility Id: 58001689 Facility Id: 58001689 AFIN: 5800272	777 TYLER ROAD	NW 1/2 - 1 (0.625 mi.)	E16	63

ADDITIONAL ENVIRONMENTAL RECORDS

Records of Emergency Release Reports

SPILLS: Emergency Response Incidents database.

A review of the SPILLS list, as provided by EDR, and dated 04/08/2018 has revealed that there is 1 SPILLS site within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
AMERICOLD LOGISTICS	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C5	14

EXECUTIVE SUMMARY

Other Ascertainable Records

RMP: When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

A review of the RMP list, as provided by EDR, and dated 11/02/2017 has revealed that there are 3 RMP sites within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
AMERICOLD, RUSSELLEV	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C7	27
RUSSELLEVILLE VALLEY	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C10	39
AMERICOLD LOGISTICS	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C11	44

FINDS: The Facility Index System contains both facility information and "pointers" to other sources of information that contain more detail. These include: RCRIS; Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]; CERCLIS; DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes); Federal Underground Injection Control (FURS); Federal Reporting Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PADS; RCRA-J (medical waste transporters/disposers); TRIS; and TSCA. The source of this database is the U.S. EPA/NTIS.

A review of the FINDS list, as provided by EDR, and dated 02/21/2018 has revealed that there are 4 FINDS sites within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ROCKLINE INDUSTRIES,	500 INDUSTRIAL BLVD	ENE 1/8 - 1/4 (0.182 mi.)	A1	8
BUBBUS MOBILE HOME P	400 BLOCK OF WAREHOS	NNE 1/4 - 1/2 (0.407 mi.)	B4	14
AMERICOLD, RUSSELLEV	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C8	38
CARMAR VALLEY	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C9	38

ECHO: ECHO provides integrated compliance and enforcement information for about 800,000 regulated facilities nationwide.

A review of the ECHO list, as provided by EDR, and dated 01/13/2018 has revealed that there are 2 ECHO sites within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ROCKLINE INDUSTRIES,	500 INDUSTRIAL BLVD	ENE 1/8 - 1/4 (0.182 mi.)	A1	8
CARMAR VALLEY	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C9	38

EXECUTIVE SUMMARY

PERMITS: A list of sites permitted by the Department of Environmental Quality, including Air, Mining, Solid Waste and Water.

A review of the PERMITS list, as provided by EDR, and dated 03/12/2018 has revealed that there are 2 PERMITS sites within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ROCKLINE INDUSTRIES, Facility Status: A	500 INDUSTRIAL BLVD	ENE 1/8 - 1/4 (0.182 mi.)	A2	8
BUBBUS MOBILE HOME P Facility Status: A	400 BLOCK OF WAREHOS	NNE 1/4 - 1/2 (0.407 mi.)	B3	11

TIER 2: A listing of facilities which store or manufacture hazardous materials and submit a chemical inventory report.

A review of the TIER 2 list, as provided by EDR, and dated 12/31/2013 has revealed that there is 1 TIER 2 site within approximately 0.5 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
AMERICOLD LOGISTICS Facility Record Id: FATR20128D9D9L00JP9U Facility Record Id: FATR2013932CSA002SG2	203 INDUSTRIAL BLVD	ESE 1/4 - 1/2 (0.475 mi.)	C5	14

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR Hist Auto: EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

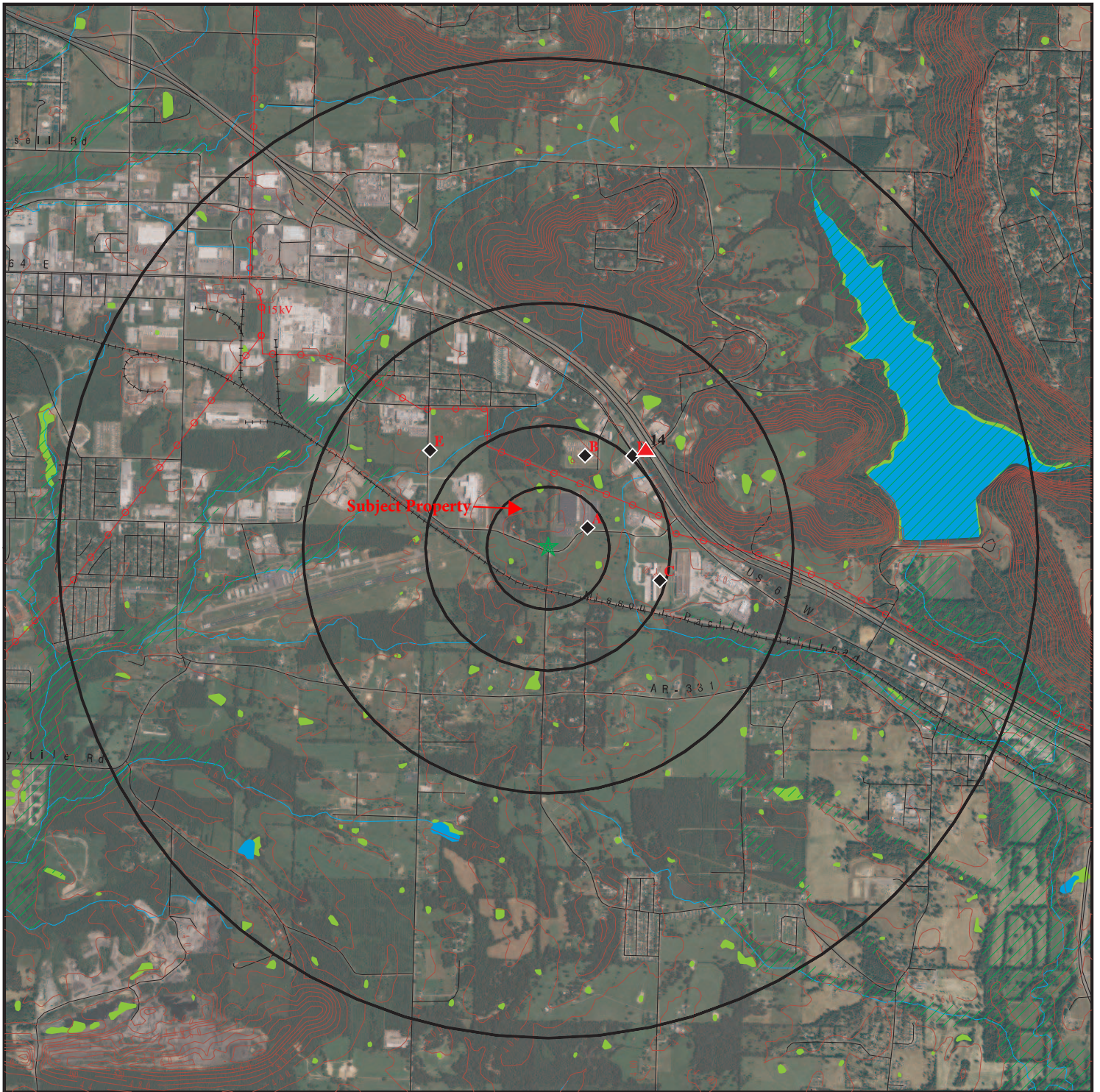
A review of the EDR Hist Auto list, as provided by EDR, has revealed that there is 1 EDR Hist Auto site within approximately 0.625 miles of the target property.

<u>Lower Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
RELIANT ENERGY INC	4408 E MAIN ST	NE 1/2 - 1 (0.511 mi.)	D12	50

EXECUTIVE SUMMARY

There were no unmapped sites in this report.

OVERVIEW MAP - 5326371.2S



★ Target Property

▲ Sites at elevations higher than or equal to the target property

◆ Sites at elevations lower than the target property

⚙ Manufactured Gas Plants

☒ National Priority List Sites

☒ Dept. Defense Sites

Indian Reservations BIA

Power transmission lines

100-year flood zone

500-year flood zone

National Wetland Inventory

State Wetlands

Upgradient Area

0 1/2 1 2 Miles

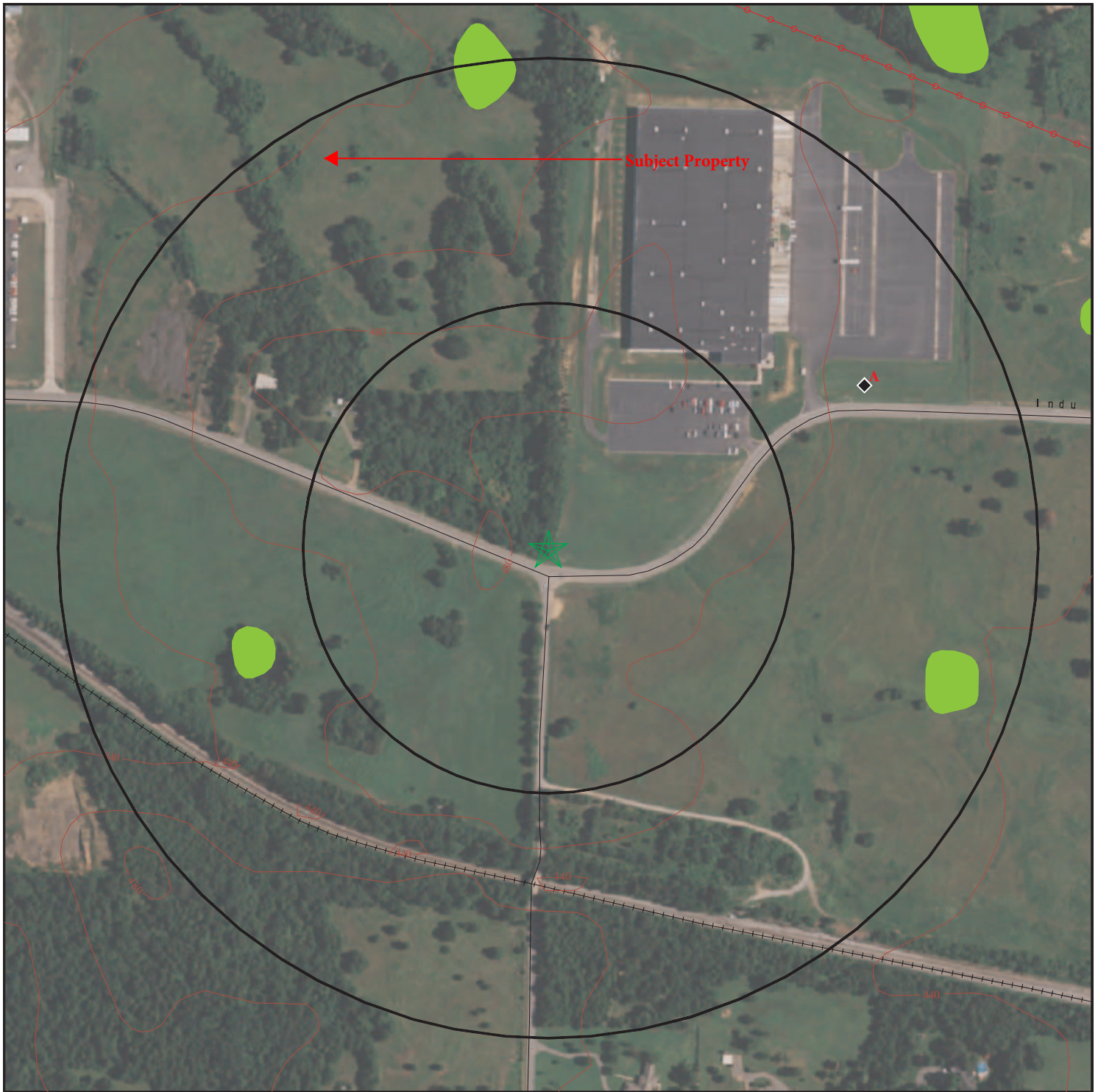


This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Vacant Industrial Property
ADDRESS: S13-T7N-R20W
Russellville AR 72802
LAT/LONG: 35.262018 / 93.076575

CLIENT: Environmental Enterprise Group
CONTACT: Tara Freeman
INQUIRY #: 5326371.2s
DATE: June 08, 2018 2:41 pm

DETAIL MAP - 5326371.2S



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ⚡ Manufactured Gas Plants
- ⚠ Sensitive Receptors
- 🏠 National Priority List Sites
- 🏠 Dept. Defense Sites

- 🏠 Indian Reservations BIA
- ⚡ Power transmission lines
- 🌊 100-year flood zone
- 🌊 500-year flood zone
- 🌊 National Wetland Inventory
- 🌊 State Wetlands

This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Vacant Industrial Property
 ADDRESS: S13-T7N-R20W
 Russellville AR 72802
 LAT/LONG: 35.262018 / 93.076575

CLIENT: Environmental Enterprise Group
 CONTACT: Tara Freeman
 INQUIRY #: 5326371.2s
 DATE: June 08, 2018 2:41 pm

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
<i>Federal NPL site list</i>								
NPL	1.500		0	0	0	0	0	0
Proposed NPL	1.500		0	0	0	0	0	0
NPL LIENS	0.500		0	0	0	NR	NR	0
<i>Federal Delisted NPL site list</i>								
Delisted NPL	1.500		0	0	0	0	0	0
<i>Federal CERCLIS list</i>								
FEDERAL FACILITY	1.000		0	0	0	0	NR	0
SEMS	1.000		0	0	0	0	NR	0
<i>Federal CERCLIS NFRAP site list</i>								
SEMS-ARCHIVE	1.000		0	0	0	0	NR	0
<i>Federal RCRA CORRACTS facilities list</i>								
CORRACTS	1.500		0	0	0	0	0	0
<i>Federal RCRA non-CORRACTS TSD facilities list</i>								
RCRA-TSDF	1.000		0	0	0	0	NR	0
<i>Federal RCRA generators list</i>								
RCRA-LQG	0.750		0	0	0	0	NR	0
RCRA-SQG	0.750		0	0	0	0	NR	0
RCRA-CESQG	0.750		0	0	0	1	NR	1
<i>Federal institutional controls / engineering controls registries</i>								
LUCIS	1.000		0	0	0	0	NR	0
US ENG CONTROLS	1.000		0	0	0	0	NR	0
US INST CONTROL	1.000		0	0	0	0	NR	0
<i>Federal ERNS list</i>								
ERNS	0.500		0	0	1	NR	NR	1
<i>State- and tribal - equivalent NPL</i>								
SHWS	1.500		0	0	0	0	0	0
<i>State and tribal landfill and/or solid waste disposal site lists</i>								
SWF/LF	1.000		0	0	0	0	NR	0
SWID	1.000		0	0	0	0	NR	0
<i>State and tribal leaking storage tank lists</i>								
LTANKS	1.000		0	0	0	0	NR	0
INDIAN LUST	1.000		0	0	0	0	NR	0
<i>State and tribal registered storage tank lists</i>								
FEMA UST	0.750		0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
UST	0.750		0	0	0	2	NR	2
AST	0.750		0	0	0	1	NR	1
INDIAN UST	0.750		0	0	0	0	NR	0
State and tribal institutional control / engineering control registries								
ENG CONTROLS	1.000		0	0	0	0	NR	0
INST CONTROL	1.000		0	0	0	0	NR	0
State and tribal voluntary cleanup sites								
INDIAN VCP	1.000		0	0	0	0	NR	0
VCP	1.000		0	0	0	0	NR	0
State and tribal Brownfields sites								
BROWNFIELDS	1.000		0	0	0	0	NR	0
ADDITIONAL ENVIRONMENTAL RECORDS								
Local Brownfield lists								
US BROWNFIELDS	1.000		0	0	0	0	NR	0
Local Lists of Landfill / Solid Waste Disposal Sites								
SWRCY	1.000		0	0	0	0	NR	0
INDIAN ODI	1.000		0	0	0	0	NR	0
DEBRIS REGION 9	1.000		0	0	0	0	NR	0
ODI	1.000		0	0	0	0	NR	0
IHS OPEN DUMPS	1.000		0	0	0	0	NR	0
Local Lists of Hazardous waste / Contaminated Sites								
US HIST CDL	0.500		0	0	0	NR	NR	0
CDL	0.500		0	0	0	NR	NR	0
US CDL	0.500		0	0	0	NR	NR	0
Local Land Records								
LIENS 2	0.500		0	0	0	NR	NR	0
Records of Emergency Release Reports								
HMIRS	0.500		0	0	0	NR	NR	0
SPILLS	0.500		0	0	1	NR	NR	1
SPILLS 90	0.500		0	0	0	NR	NR	0
SPILLS 80	0.500		0	0	0	NR	NR	0
Other Ascertainable Records								
RCRA NonGen / NLR	0.750		0	0	0	0	NR	0
FUDS	1.500		0	0	0	0	0	0
DOD	1.500		0	0	0	0	0	0
SCRD DRYCLEANERS	1.000		0	0	0	0	NR	0
US FIN ASSUR	0.500		0	0	0	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
EPA WATCH LIST	0.500		0	0	0	NR	NR	0
2020 COR ACTION	0.750		0	0	0	0	NR	0
TSCA	0.500		0	0	0	NR	NR	0
TRIS	0.500		0	0	0	NR	NR	0
SSTS	0.500		0	0	0	NR	NR	0
ROD	1.500		0	0	0	0	0	0
RMP	0.500		0	0	3	NR	NR	3
RAATS	0.500		0	0	0	NR	NR	0
PRP	0.500		0	0	0	NR	NR	0
PADS	0.500		0	0	0	NR	NR	0
ICIS	0.500		0	0	0	NR	NR	0
FTTS	0.500		0	0	0	NR	NR	0
MLTS	0.500		0	0	0	NR	NR	0
COAL ASH DOE	0.500		0	0	0	NR	NR	0
COAL ASH EPA	1.000		0	0	0	0	NR	0
PCB TRANSFORMER	0.500		0	0	0	NR	NR	0
RADINFO	0.500		0	0	0	NR	NR	0
HIST FTTS	0.500		0	0	0	NR	NR	0
DOT OPS	0.500		0	0	0	NR	NR	0
CONSENT	1.500		0	0	0	0	0	0
INDIAN RESERV	1.500		0	0	0	0	0	0
FUSRAP	1.500		0	0	0	0	0	0
UMTRA	1.000		0	0	0	0	NR	0
LEAD SMELTERS	0.500		0	0	0	NR	NR	0
US AIRS	0.500		0	0	0	NR	NR	0
US MINES	0.750		0	0	0	0	NR	0
ABANDONED MINES	0.750		0	0	0	0	NR	0
FINDS	0.500		0	1	3	NR	NR	4
UXO	1.500		0	0	0	0	0	0
ECHO	0.500		0	1	1	NR	NR	2
DOCKET HWC	0.500		0	0	0	NR	NR	0
FUELS PROGRAM	0.750		0	0	0	0	NR	0
AIRS	0.500		0	0	0	NR	NR	0
ASBESTOS	0.500		0	0	0	NR	NR	0
COAL ASH	1.000		0	0	0	0	NR	0
ENF	0.500		0	0	0	NR	NR	0
Financial Assurance	0.500		0	0	0	NR	NR	0
PERMITS	0.500		0	1	1	NR	NR	2
AR Sludge	1.000		0	0	0	0	NR	0
TIER 2	0.500		0	0	1	NR	NR	1
UIC	0.500		0	0	0	NR	NR	0

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP	1.500	0	0	0	0	0	0
EDR Hist Auto	0.625	0	0	0	1	NR	1
EDR Hist Cleaner	0.625	0	0	0	0	NR	0

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA HWS	0.500	0	0	0	NR	NR	0
---------	-------	---	---	---	----	----	---

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
RGA LF	0.500		0	0	0	NR	NR	0
RGA LUST	0.500		0	0	0	NR	NR	0
- Totals --		0	0	3	11	5	0	19

NOTES:

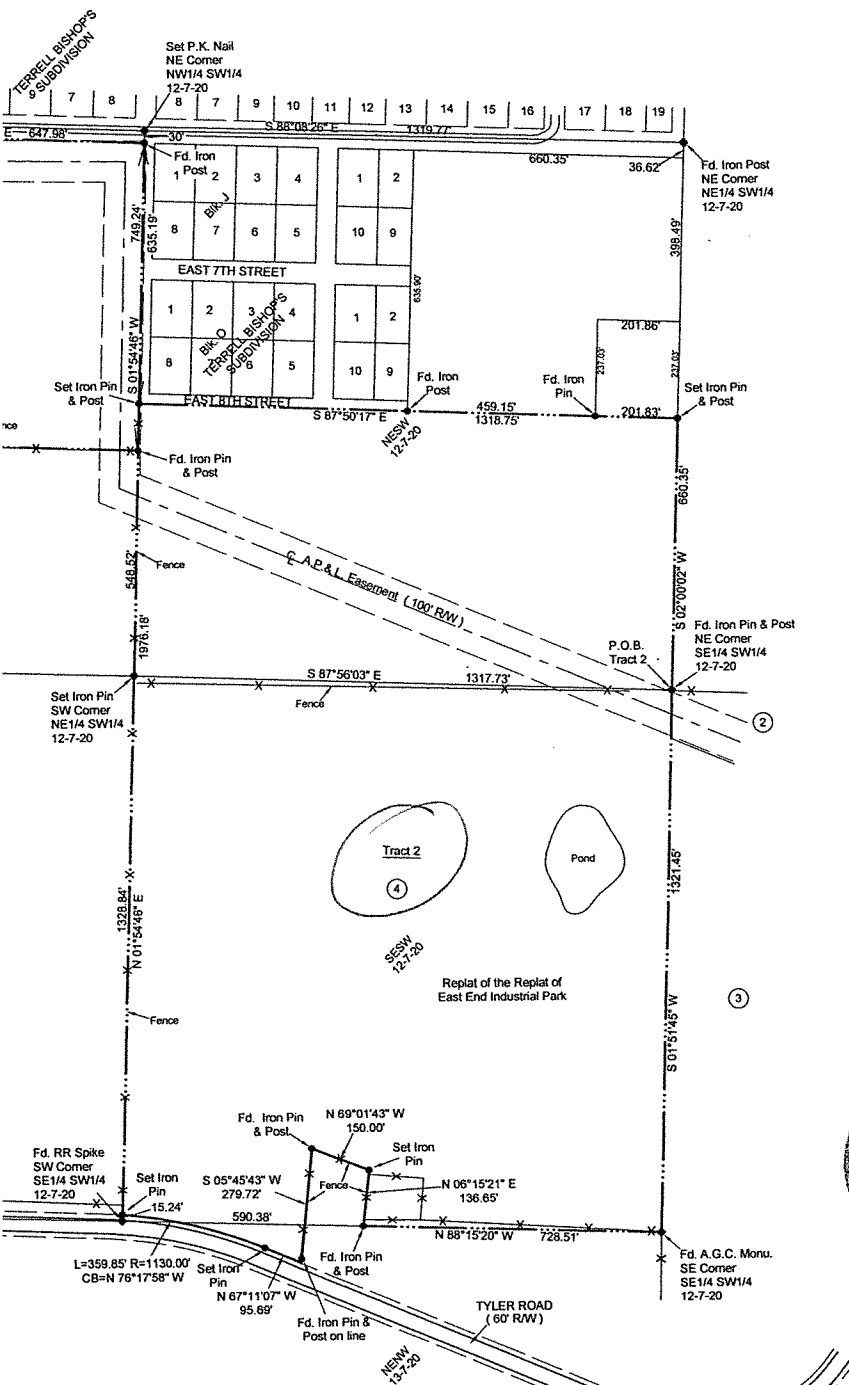
TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

Appendix E

Legal Description



3 N 89°36'08" E, along the South
 3 S 01°54'46" W, 749.24 ft.; thence
 ng. Containing 22.47 acre as surveyed.

12, and a part of the NE1/4 of the NW1/4
 11°51'45" W, along the East line thereof,
 3 N 69°01'43" W, 150.00 ft.; thence
 along said right-of-way, along a curve to the
 ne, 1976.18 ft.; thence S 87°50'17" E,
 ng. Containing 20.02 acres in the NE1/4 of
 15 acres as surveyed.

R-20-W, and more particularly described as
 3 S 89°21'41" E, 170.11 ft. to a point on the
 follows: N 80°47'43" W, 107.66 ft.;
 *43°54" W, 282.31 ft.; S 64°48'23" W, 92.42
 nt-of-way, 269.01 ft. to a point on the West

-of-way of the Union Pacific Railroad and the
 1g said East line, 181.29 ft. to a point on the
 SE1/4; thence N 02°24'59" E, along said

Basis of Bearings
 Arkansas State Plane North / US Survey Foot
 Combined Scale Factor: 0.999951551766
 Convergence Factor: -0°37'35"
 Corner: SE
 Coordinate: N: 340167.585 / E: 990969.917

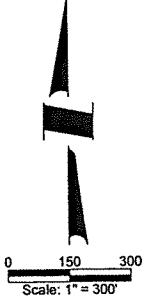
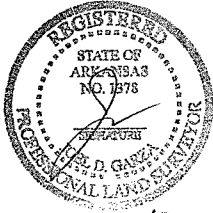
Coding Data: 500-07N-20W-0-11-220-58-1378
 Coding Data: 500-00N-20W-0-12-300-58-1378
 Coding Data: 500-07N-20W-0-13-410-58-1378

NOTE: Part of tract 3 is in a designated 100 Year Flood Plain
 as per FEMA Map No. 05115C0390E, dated March 2, 2010.
 All other tracts are not in said 100 Year Flood Plain.

SURVEYOR'S CERTIFICATE

This is to certify that the above described property has been surveyed under my
 personal supervision and the above plat is an acceptable accurate representation thereof
 and shows the location of the property, its exterior boundaries, roadways, any known
 easements and observable encroachments, if any.

This survey is made for the use of the parties shown hereon and also for those who
 purchase, mortgage or guarantee the title for said parties. Barrett & Associates, Inc., its
 associates, and/or agents shall not be liable for use of this survey by any other entities or
 persons for any purpose beyond the date shown. This document should contain a red seal



Revisions



**Arkansas Valley Alliance for
 Economic Development Inc.**
 Property Surveys



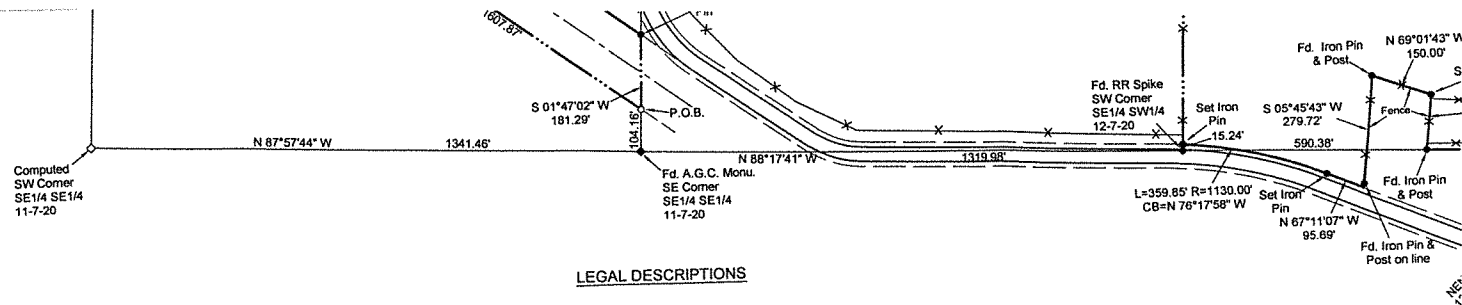
WWW.BARRETTANDASSOC.COM
 608 WEST "B" STREET
 RUSSELLVILLE, ARKANSAS 72801
 Off (479) 688-5005 Fax (479) 688-5564

Date: 02/28/17

Scale: 1" = 300'

Job No: 1623-01

Sheet No.



LEGAL DESCRIPTIONS

Tract 1:

A part of the NW1/4 of the SW1/4 of Section 12, T-7-N, R-20-W, Russellville, Pope County, Arkansas, more particularly described as follows:

Commencing at the NW Corner of said NW1/4 of the SW1/4; thence S 02°07'52\" W, along the West line thereof, 60.00 ft. to the Point of Beginning; thence N 89°36'08\" E, along the South right-of-way of East 6th Street, 670.66 ft.; thence S 87°50'02\" E, along said right-of-way, 647.98 ft. to a point on the East line of said NW1/4 of the SW1/4; thence S 01°54'46\" W, 749.24 ft.; thence N 87°51'55\" W, 1320.84 ft. to a point on the West line of said NW1/4 of the SW1/4; thence N 02°07'52\" E, along said West line, 719.95 ft. to the Point of Beginning. Containing 22.47 acre as surveyed. Subject to any right-of-way dedications and easements of record.

Tract 2:

Lot 4, Replat of the Replat of East End Industrial Park, to the City of Russellville, Pope County, Arkansas, being a part of the E1/2 of the SW1/4 of Section 12, and a part of the NE1/4 of the NW1/4 of Section 13, all in T-7-N, R-20-W, more particularly described as follows: Beginning at the NE Corner of the SE1/4 of the SW1/4 of said Section 12; thence S 01°51'45\" W, along the East line thereof, 1321.45 ft. to the SE Corner of said SE1/4 of the SW1/4; thence N 88°15'20\" W, along the South line thereof, 728.51 ft.; thence N 06°15'21\" E, 136.65 ft.; thence N 69°01'43\" W, 150.00 ft.; thence S 05°45'43\" W, 279.72 ft. to a point on the North right-of-way of Tyler Road; thence N 67°11'07\" W, along said right-of-way, 95.69 ft.; beginning N 76°17'58\" W, along said right-of-way, along a curve to the left, having a radius of 1130.00 ft., and a curve length of 359.85 ft. to a point on the West line of the E1/2 of the SW1/4; thence N 01°54'46\" E, along said West line, 1976.18 ft.; thence S 87°50'17\" E, 1318.75 ft. to a point on the East line of the NE1/4 of the SW1/4 of said Section 12; thence S 02°00'02\" W, along said East line, 660.35 ft. to the Point of Beginning. Containing 20.02 acres in the NE1/4 of the SW1/4 of Section 12, 39.54 acres in the SE1/4 of the SW1/4 of Section 12, and 0.29 acres in the NE1/4 of the NW1/4 of Section 13, for an aggregate of 59.85 acres as surveyed.

Tract 3:

Lot 1, Tyler Road Industrial Development, to the City of Russellville, Pope County, Arkansas, being a part of the SE1/4 of the SE1/4 of Section 11, T-7-N, R-20-W, and more particularly described as follows: Beginning at the NW Corner of said SE1/4 of the SE1/4; thence S 88°06'20\" E, along the North line thereof, 1130.76 ft.; thence S 01°49'16\" W, 116.86 ft.; thence S 89°21'41\" E, 170.11 ft. to a point on the West right-of-way of Tyler Road; thence S 02°17'55\" W, along said right-of-way, 75.52 ft. to a point on the centerline of a Branch; thence along said Branch as follows: N 80°47'43\" W, 107.66 ft.; N 67°42'37\" W, 47.74 ft.; N 49°21'13\" W, 96.89 ft.; N 31°05'17\" W, 80.26 ft.; N 88°25'27\" W, 293.11 ft.; N 85°26'03\" W, 63.70 ft.; S 46°42'25\" W, 100.36 ft.; S 62°43'54\" W, 282.31 ft.; S 64°48'23\" W, 92.42 ft.; S 83°36'24\" W, 38.62 ft.; S 52°04'10\" W, 17.62 ft. to a point on the Northerly right-of-way of the Union Pacific Railroad; thence N 54°05'01\" W, along said right-of-way, 269.01 ft. to a point on the West line of said SE1/4 of the SE1/4; thence N 02°24'59\" E, along said West line, 146.10 ft. to the Point of Beginning. Containing 3.73 acres as surveyed.

Tract 4:

A part of the SE1/4 of the SE1/4 of Section 11, T-7-N, R-20-W, Russellville, Pope County, Arkansas, more particularly described as follows: Commencing at the NW Corner of said SE1/4 of the SE1/4; thence S 02°24'59\" W, along the West line thereof, 146.10 ft. to a point on the Northerly right-of-way of the Union Pacific Railroad and the Point of Beginning; thence S 54°05'01\" E, along said right-of-way, 1605.43 ft. to a point on the East line of said SE1/4 of the SE1/4; thence S 01°47'02\" W, along said East line, 181.29 ft. to a point on the Southerly right-of-way of the Union Pacific Railroad; thence N 54°03'06\" W, along said right-of-way, 1607.87 ft. to a point on the West line of said SE1/4 of the SE1/4; thence N 02°24'59\" E, along said West line, 179.79 ft. to the Point of Beginning. Containing 5.53 acres as surveyed. Subject to any right-of-way dedications and easements of record.

Appendix F

Photographs



Northern Border of Subject Property



Southern Border of Subject Property

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

EEG Project #18-0115-019

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Southern Border of Subject Property



Eastern Border of Subject Property

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RUSSELLVILLE, ARKANSAS**

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Western Border of Subject Property



Overview of Northern Portion Subject Property

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Overview of Southern Portion of Subject Property



Overview of Subject Property

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Utility Easement Across Northern Portion of Subject Property



Pond on Eastern Portion of Subject Property

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RUSSELLVILLE, ARKANSAS**

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Northerly Adjoining Property



Northeasterly Adjoining Property

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RUSSELLVILLE, ARKANSAS**

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Southerly Adjoining Property



Southerly Adjoining Property

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Easterly Adjoining Property



Easterly Adjoining Property

**TRACT 2
EAST END INDUSTRIAL PARK
RUSSELLVILLE, ARKANSAS**

EEG Project #18-0115-019

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Appendix G

User Questionnaire

USER PROVIDED INFORMATION – USER'S RESPONSIBILITIES

ASTM 1527-13 Section 6 describes task to be performed by the user. In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "*Brownfields Amendments*"), the user must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. These inquiries must also be conducted by EPA Brownfield Assessment and Characterization grantees.

The user information provided can assist the environmental professional in identifying recognized environmental conditions. The User Questionnaire is to assist the user in gathering information that may be material to identifying recognized environmental conditions. The user should provide the following information to the environmental professional. Failure to conduct these inquiries could result in a determination that "all appropriate inquiries" is not complete.

USER QUESTIONNAIRE

P18-116

Date Completed: June 18, 2018

Completed By (Print Name & Title): Suzy Griffin Vice President Signature: Suzy Griffin

Review Title and Judicial Records for Environmental liens and Activity and Use Limitations (AULs)
(40 CFR 312.20 and 40 CFR 312.25).

1. Did a search of recorded land title records (or judicial records where appropriate) identify any environmental liens filed or recorded against the property under federal, tribal, state or local law? (Chain of title reports will not normally disclose environmental liens.)

no

2. Did a search of recorded land title records (or judicial records where appropriate) identify any AULs, such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the property under federal, tribal, state or local law? (Chain of title reports will not normally disclose AULs.)

no

Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).

3. Do you have any specialized knowledge or actual experience related to the property or nearby properties to identify conditions indicative of a release or threatened release? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?

no

Reason for Significantly Lower Purchase Price (40 CFR 312.29).

4. Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?

property is not being sold at this time

Commonly known or reasonably ascertainable information (40 CFR 312.30). Commonly known or reasonably ascertainable information within the local community about the property must be taken into account by the user.

- 5a. Do you know the past uses of the property?

Vacant land - nothing since last Phase I study.

- 5b. Do you know of specific chemicals that are present or once were present at the property?

no

- 5c. Do you know of spills or other chemical releases that have taken place at the property?

no

- 5d. Do you know of any environmental cleanups that have taken place at the property?

no

The degree of obviousness (40 CFR 312.31).

6. Based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of releases at the property?

none

Appendix H

Credentials

Keith Zimmerman, P.G.

President and Senior Project Manager

Education

B.S. Geology
University of Arkansas
Fayetteville, Arkansas (1984)

M.S. Geology
University of Arkansas
Fayetteville, Arkansas (1987)

Certifications

Registered Professional
Geologist #1643 - State of Arkansas

EPA/AHERA Accredited
Asbestos Inspector
State Certified in Arkansas
State Certified in Missouri

Training Courses

Environmental Site Assessments for
Commercial Real Estate, Technical
and Professional Training, American
Society for Testing and Materials
(ASTM) E 1527-00; E 1528-00;
E 1527-05; E 1528-05

OSHA 40 Hour HAZWOPER

National Institute of Occupational
Safety and Health (NIOSH) 582
Certification Course

Environmental Training Corp.
Quality Control for Asbestos
Analysis Laboratories

Airborne Asbestos Sampling and
Laboratory Analysis 582 Certification
Course, Texas Engineering Extension
Service, Texas A&M University
System

McCrone Research Institute TEM
introduction and TEM Asbestos
Analysis

TSI Indoor Air Quality Training

Seminar Instruction EEG, Inc.
NIOSH 582 Equivalency Course

Keith Zimmerman obtained a *Bachelor of Science degree in Geology* and a *Master of Science degree in Geology* from the University of Arkansas in Fayetteville, Arkansas. Keith is President of EEG and Senior Project Manager.

He serves as EEG's environmental consultant on issues regarding air quality, water quality, and hazardous waste. Mr. Zimmerman has worked with EEG in the environmental services field since 1989, with primary emphasis on Phase I Environmental Site Assessments, Phase II Subsurface Environmental Site Assessments involving groundwater investigations, UST removal projects and Phase III soil remediation activities. Mr. Zimmerman is listed with the Arkansas Department of Environmental Quality (ADEQ) as outlined by the Arkansas Pollution Control and Ecology Commission's Regulation 32. This Regulation requires ADEQ maintain a list of environmental professionals who meet the education and experience requirements set forth in federal regulations 40 CFR 312.10 and Regulation 32 32.301(B) Certification Criteria for Phase I Consultants.

Mr. Zimmerman supervises the quality and final review of EEG's reports. His review ensures that technical issues have been addressed in a thorough and accurate manner, and that EEG maintains its standards for the production of high-quality technical reports. Keith has been involved with the accurate and timely production of more than 10,000 environmental and analytical reports. Prior to joining EEG he was employed as a geologist for the Arkansas Department of Pollution Control and Ecology (ADPC&E) currently ADEQ and worked as a consultant geologist for Weyerhaeuser Company.

PROJECT EXPERIENCE

Environmental Site Assessments/Hazard Assessment Surveys

Arvest Bank
Centennial Bank
CenterPoint Energy
First Security Bank
Harps Food Stores
Lindsey Management Company
Martin Marietta Materials
Regions Bank
Specialized Real Estate Group
Tyson Foods
University of Arkansas Fayetteville
University of Arkansas for Medical Science
U.S. Forest Service
Veterans Healthcare System of the Ozarks

Professional Associations

Arkansas Environmental Federation

The Geological Society of America

Geological Investigations

Arkansas Department of Pollution Control &
Ecology

International Paper

Weyerhaeuser Company

Chart Industries

Asbestos Investigations

University of Arkansas for Medical Sciences
(UAMS)

Veterans Healthcare System of the Ozarks