

PHASE I ENVIRONMENTAL SITE ASSESSMENT

700 ACRE TRACT
HWY 82
CROSSETT, ARKANSAS 71635

December 2018

Prepared for:
CROSSETT ECONOMIC DEVELOPMENT FOUNDATION
125 MAIN STREET
CROSSETT, ARKANSAS 71635

Prepared by:



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ECCI Project Number: 4292-3006

December 2018

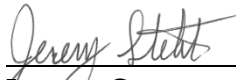
Prepared for:
CROSSETT ECONOMIC DEVELOPMENT FOUNDATION

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

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

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information (Regulation 32.607).

PREPARED BY:



JEREMY STEHLE

SENIOR ENVIRONMENTAL SCIENTIST

REVIEWED BY:



ROD BREUER

PRINCIPAL

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1.0 Executive Summary

ECCI has performed a Phase I Environmental Site Assessment (ESA) for the Crossett Economic Development Foundation. This Phase I ESA was performed on an approximately 700-acre tract located in Crossett, Arkansas. This Phase I ESA was performed in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E 1527 - 13, "*Environmental Site Assessments: Phase I Environmental Site Assessment*," hereinafter referred to as the Standard. Any exceptions to, or deletions from, the Standard are discussed in Section 9.0 of this report. This report will serve to summarize the work performed by ECCI professionals as part of this project.

The purpose of this Phase I ESA on this parcel of commercial real estate is to investigate the presence of the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)(42 U.S.C. §9601) and petroleum products. This report is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability: that is, the practice that constitutes all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice.

While use of this Phase I ESA is intended to constitute all appropriate inquiries, it is not intended that its use be limited to that purpose. This report is intended primarily as an approach to conducting an inquiry designed to identify recognized environmental conditions (RECs) in connection with a property. This practice is intended to reflect a commercially prudent and reasonable inquiry.

The subject property is located south of Hwy 82 in Ashley County, in Crossett, Arkansas. The surrounding properties are utilized in the industrial sector and timber production.

During the course of this project, ECCI performed a site reconnaissance, reviewed federal, state, and local records, and interviewed persons familiar with the

property to ascertain historical use of the property and surrounding areas. ECCI did not observe any controlled environmental conditions, historical recognized environmental conditions, or recognized environmental conditions on the subject property. Information on the findings and conclusions can be found in Table 1.1 below. Further descriptions and a summary of the site characteristics can be found in section 6.0.

Table 1.1 – Summary of Findings, Opinion and Conclusions

FINDINGS	SUMMARY
Primarily Undeveloped Timber Property	There were no spills reported on the subject property or the surrounding property.
	OPINION AND CONCLUSION: ECCI did not observe any controlled environmental conditions, historical recognized environmental conditions, or recognized environmental conditions on the subject property.

The western adjacent property (Alvar Resins, Inc.), is identified in the *EDR Radius Map Report* as large quantity generator of hazardous waste. At the time of site inspection, a large number of totes were observed on the east of the main building. The northeastern adjacent property (Georgia Pacific), historically chipped used railroad ties to be sold as fuel source to other industries. ECCI did not observe any above ground storage tanks, ponds, pits, or lagoons. There were no records indicating that a reportable quantity release had occurred on these sites, however these sites could represent a “*material threat*” to the 700-acre tract property. Therefore, these sites could be considered to represent a potential material threat.

ECCI assumes that information provided by persons interviewed for this project is correct. The investigation is limited to visually observable environmental conditions present on the property at the time of the site inspection. Whenever possible, adjoining properties were visually inspected. This report and all work performed in conjunction with this report is for the exclusive use of the Crossett Economic Development Foundation and their agents or assigns. Other entities or individuals may only rely on

this report with the express written consent of the Crossett Economic Development Foundation and ECCI.

There were no records indicating that a reportable quantity release had occurred on the site. The site could represent a “*material threat*” to the L’Oréal property if any of the tanks were to fail. ECCI did not have access to the adjacent property to determine if there was evidence of damage or deterioration serious enough to cause or contribute to a release of the tank contents. Without access to the property, the condition of the tanks and secondary containment could not be determined. Therefore, the tank farm is considered to represent a potential material threat.

2.0 Introduction

2.1 Purpose of the Phase I Environmental Site Assessment

ECCI was authorized by the Crossett Economic Development Foundation to perform a Phase I ESA on the 700-acre tract of property located south of Highway 82 in Ashley County in the eastern portion of Crossett, Arkansas. The subject property is currently utilized for timber production.

The purpose of this Phase I ESA is to identify and describe past uses of the property which involved hazardous substances or petroleum products and existing or potential recognized environmental conditions, controlled recognized environmental condition, or historical recognized environmental conditions (as defined by ASTM Practice E 1527-13) in connection with the Property. A **Recognized Environmental Condition** (REC) is defined in the Standard as 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. A **controlled recognized environmental condition** is defined 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, with hazardous substances or petroleum products

allowed to remain in place subject to the implementation of required controls. A **historical recognized environmental condition** is defined as 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 meet unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. A **de minimis condition** is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. *De minimis* conditions are not Recognized Environmental Conditions.

2.2 Detailed Scope of Services

The Standard identifies four (4) component parts of a Phase I ESA. The components are site reconnaissance, records review, interviews, and evaluation and report preparation. The scope of work developed for this project as defined by the four (4) components is as follows:

2.2.1 Site Reconnaissance

Mr. Jeremy Stehle with ECCI conducted a site visit on the subject property located in Crossett, Arkansas on December 5, 2018. The purpose of the visit was to visually and physically observe the property and any structures located on the subject property. During the visit, the environmental professional noted information about the general conditions and site setting of the subject property. The objective of the site visit was to obtain information to identify and describe past uses of the property which involved hazardous substances or petroleum products and to identify potential RECs associated with the property.

2.2.2 Records Review

A review of reasonably ascertainable federal and state records was performed to help identify RECs in connection with the property. ECCI obtains federal and state records from Environmental Data Resources (EDR) in

Southport, Connecticut. Standard environmental record sources reviewed included:

- National Priorities List (NPL);
- CERCLIS List;
- CERCLIS NFRAP Site List;
- RCRA CORRACTS;
- RCRA Transportation, Storage, and Disposal Facilities;
- RCRA Generators List;
- Federal institutional control/engineering control registries;
- Federal ERNS List;
- State and tribal lists of hazardous waste sites identified for investigation or remediation;
- Emergency Response Notification System List;
- State Remedial Action Site List;
- State and Tribal Landfill List;
- State and Tribal Voluntary Cleanup Sites;
- State and Tribal Brownfields Sites;
- State and Tribal Registered and Leaking Storage Tank Lists;
- Local Brownfields Lists;
- Local Lists of Landfills/SWDS; and
- Registered Storage Tanks.

ECCI also reviewed the current United States Geological Survey (USGS) 7.5 Minute Topographic Maps. This is a standard source for information regarding the physical setting of the property. Historical use information was obtained by reviewing available standard historical sources, which included aerial photographs. Sanborn Fire Insurance Maps and City Directories were accessed for review through EDR.

2.2.3 Interviews

In order to obtain information about current and historical use of the property and to attempt to identify any recognized environmental conditions, ECCI interviewed the following personnel.

Table 2.1 - Interviews

	Name and Number	Duration of Occupancy
Current Owner Representative	Mike Smith 479-631-1321	48 years
Key Site Manager	N/A	N/A

Current Occupants	City of Crossett and Weyerhaeuser	N/A
Historical Owner/Occupants	Plum Creek	Unavailable

Information from these interviews is summarized in Section 7.0 of this report.

2.2.4 Evaluation and Report Preparation

The final report for this project was prepared by Environmental Professionals and reviewed for technical quality by an Environmental Professional as defined by the Standard. The report includes all documentation to support the analysis, opinions, and conclusions found herein. The documentation is of sufficient detail to reconstruct all research at a later date, if necessary, as required by the Standard.

2.3 Significant Assumptions

This Phase I ESA was conducted in accordance with ASTM Standard Practice ASTM E 1527-13 to insure that methodologies used constitute appropriate inquiry into the prior uses of the property consistent with good commercial and customary practice in order to identify and analyze environmental conditions that constitute existing, past, or potential environmental risks associated with a property. Performance, in accord with these standards is intended to reduce, but not eliminate uncertainty with respect to the potential for RECs associated with a property. This report is designed to satisfy the requirements for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability as defined in 42 USC 9601(35) B. ECCI assumes that information provided by persons interviewed for this project is correct.

2.4 Limitations and Exceptions

The information presented and conclusions made in this report are based upon the site inspection, interviews and records review performed by ECCI. The assessment

is limited to visually observable environmental conditions present on the properties at the time of the site inspection. Specific assessments of the following potential environmental conditions are *excluded* from this project: asbestos, lead-based paint, potential radon gas hazards, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, biological agents and mold.

2.5 Special Terms and Conditions

The scope of work provided by ECCI and approved by the client contained no special terms and conditions to the investigation.

2.6 User Reliance

The report may be distributed and relied upon by Crossett Economic Development Foundation and their successors and assigns. Reliance on the information and conclusions presented in this report by any other party(ies) is not authorized by ECCI.

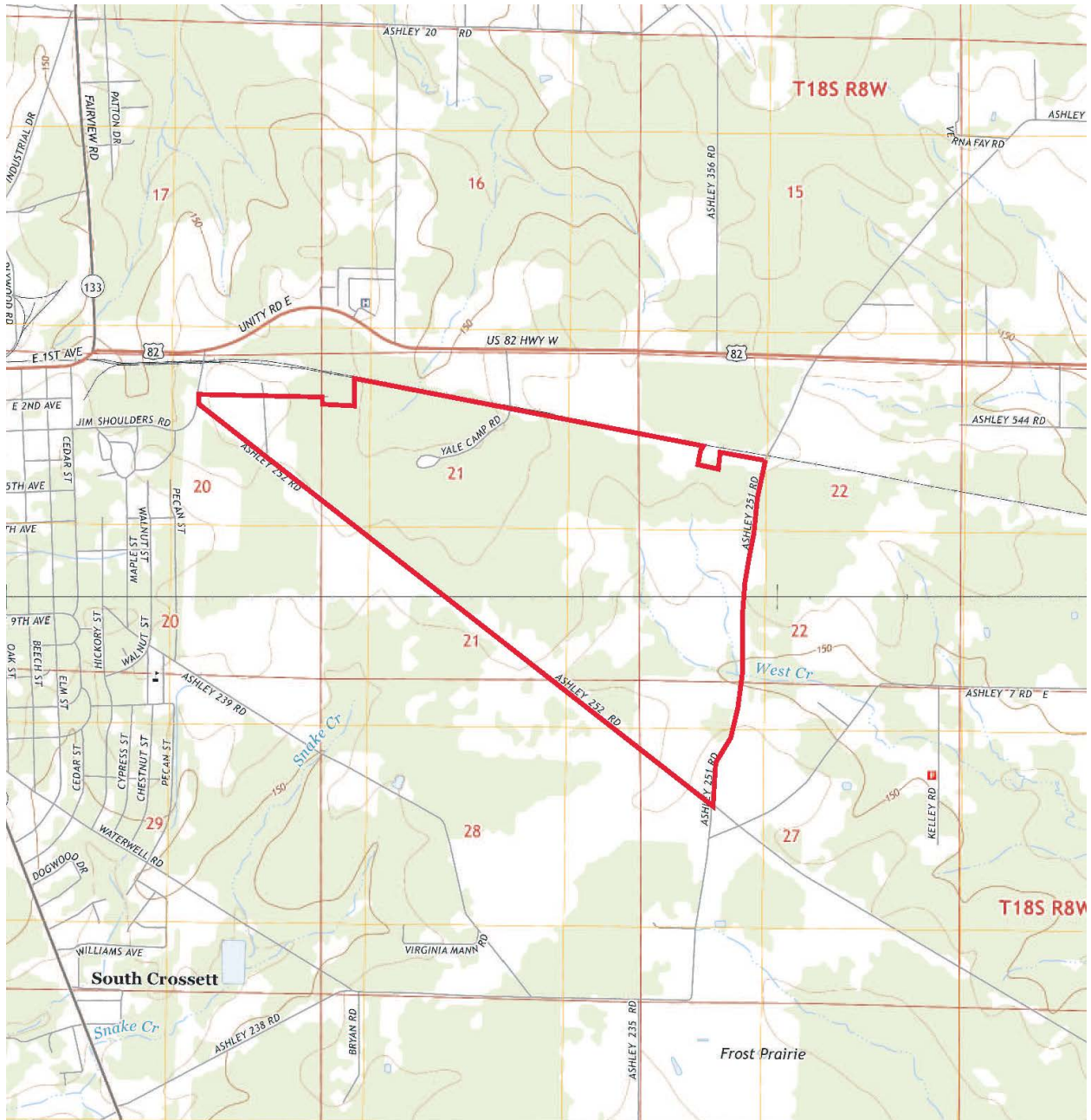
3.0 Site Description

3.1 Location and Legal Description

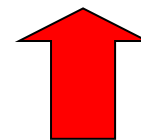
The subject property is located south of Hwy 82, north of Ashley County Road 252, west of Murphy Road and east of the Crossett Industrial Park in Ashley County, Arkansas. The property is comprised of approximately 700 acres and is utilized for timber production.

The general location of the property is depicted in Figure 3-1, Topographic General Location Map and the site layout can be seen in Figure 3-2, Aerial Photograph of General Site Layout with Adjoining Properties.

Figure 3-1 - Topographic General Location Map

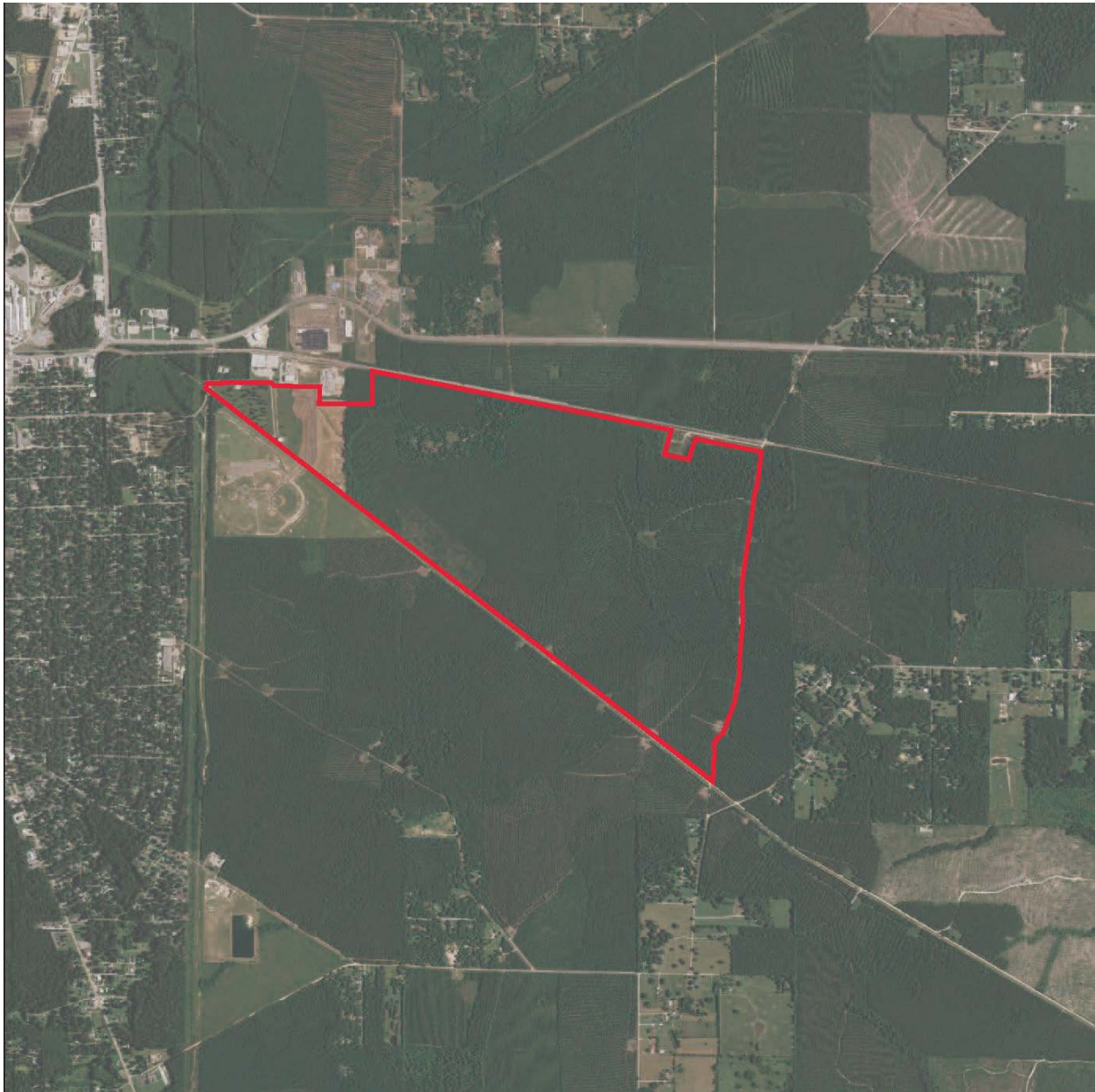


7.5 Minute Topographic Map
Crossett, Arkansas
Source: USGS/ Environmental Data Resources, Inc.
Approximate Location - Not to Scale

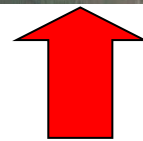


North

Figure 3-2 –Aerial Photograph of General Site Layout with Adjoining Properties



Subject Property
Crossett, Arkansas
Source: USDA/Environmental Data Resources, Inc.
Approximate Boundaries - Not to Scale



North

3.2 Site and Vicinity General Characteristics

This 700-acre tract is located in the eastern portion of Crossett, Arkansas. The property lies between Highway 82, Wellfield Road, Ashley County Road 252, and Murphy Road. The adjacent properties to the west are industrial facilities and the remaining surrounding properties in timber production.

3.3 Current Use of the Property

The Yale Girl Scout Camp is located on the northwest portion of the property. The primary use for the property is timber production. The property appears relatively flat but drains primarily to the west-northwest.

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

The property has a dirt road, Yale Camp Road entrance that extends into the western portion of the property. At the end of Yale Camp Road is the Yale Girl Scout Camp. The camp has several small cabins used by girl scouts and a larger community building all located around the circle drive at the end of Yale Camp Road. There are no other improvements on the property. Photographs of the subject property are included in Appendix B.

3.5 Site Utilities

There are no utilities located on the property. However, there are utilities on the adjacent properties to the east.

3.6 Current Use of the Adjoining Properties

There is a car dealership and medical offices to the north and west of the subject property, north of Hwy 82. There are industrial properties and a new city owned fire station to the west of the subject property. To the southwest is a city park. The remaining surrounding properties are in timber production. Highway 82 to the north, of the property, is being widened from a two-lane highway to a four-lane highway.

4.0 User Provided Information

4.1 Title Records

ECCI was not provided with documentation of the title history of the subject property for this Phase I ESA.

4.2 Environmental Liens or Activity and Use Limitations

No records of environmental liens or activity and use limitations were identified as being associated with the property or were provided to ECCI by the user.

4.3 Specialized Knowledge

The client did not provide ECCI with any information related to specialized knowledge of the subject property beyond that information discussed in the previous Phase I ESAs.

4.4 Commonly Known or Reasonably Ascertainable Information

ECCI does not have any commonly known or reasonably ascertainable information about the subject property that is material to recognized environmental conditions in connection with the subject property.

4.5 Owner, Property Manager, and Occupant Information

The Mike Smith indicated that the property has been owned for timber production for more than 50 years. The property has been owned by Georgia Pacific, Plum Creek and now by Weyerhaeuser.

4.6 Reason for Performing Phase I

ESAs are generally requested to qualify for a landowner liability protection under CERCLA. These protections include the following:

- **Bona Fide Prospective Purchase Liability Protection** 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 April 11, 2002.

- **Contiguous Property Owner Liability Protection** - 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.
- **Innocent Land Owner Defense** - a person may qualify as one of three types of innocent landowners: (i) a person who “did not know and had no reason to know” that contamination existed on the property at the time the purchaser acquired the property; (ii) a government entity which acquired the property by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain authority by purchase or condemnation; and (iii) a person who “acquired the facility by inheritance or bequest.” To qualify for the innocent landowner defense, such person must have made all appropriate inquiries on or before the date of purchase. Furthermore, the all appropriate inquiries must not have resulted in knowledge of the contamination. If it does, then such person did “know” or “had reason to know” of contamination and would not be eligible for the innocent landowner defense.

This Phase I ESA and report was prepared by ECCI at the request of the Crossett Economic Development Foundation to qualify as a bona fide prospective purchaser for liability protection.

5.0 Records Review

5.1 Standard Environmental Record Sources

ECCI obtains information regarding federal environmental databases from EDR in Southport, Connecticut. These databases contain site-specific information regarding a variety of potential environmental concerns including hazardous waste activities, the operation of aboveground and underground storage tanks, remediation investigations performed by the EPA, and other items. During this search, numerous databases are reviewed to identify sites which are in close proximity to the property and which may present a potential environmental risk to the property. The databases searched are detailed in the EDR Radius Map Report that presents information identifying any facilities found in the ASTM search radius, including the subject property. For this

Phase I ESA, the EDR Radius Map Report identified only one property in the specific records types searched. Information for this site is included in Table 5.1.

The EDR Zip Code Scan Report identifies sites in three ways; mapped sites, orphan sites, and zip code scan sites. The EDR Zip Code Scan Report identified other sites that were not mapped due to poor, duplicate, or inadequate addresses. ECCI has made a reasonable effort to reconcile this information utilizing resources which ECCI currently has available to determine if any of the sites located in Zip Code Scan Report were located within the approximate minimum search distances. There were four orphan sites reported. The Georgia Pacific Timber facility was listed as an orphan. The site is listed as an archived RCRA NonGen/NLR (no longer regulated).

A copy of the EDR Radius Map Report detailing all databases searched is included in Appendix C.

The sites identified in the EDR Radius Map database report within the ASTM search distances from the subject property are summarized in Table 5.1 below.

Table 5.1 – Sites Identified in Records Review

Map and Zip Code Identified Sites	Database Information
Alvar Resins, Inc. 141 Mac McGoogan Drive Crossett, AR 71635 West northwest 472 feet Lower elevation of 167 feet RCRA-LQG FINDS ECHO	<ol style="list-style-type: none"> 1. RCRA-LQG - This site is listed as a large quantity generator of hazardous waste. The site generates 1,000 kilograms or more per month of hazardous waste. There were six written informal and two written formal enforcement actions taken by ADEQ. Items cited were in used oil, facility standards, contingency plan and emergency procedures, container use, and pre-transport. 2. FINDS - This site is listed on the ADEQ permits database as having an air permit, NPDES permit, and a RCRA permit. 3. ECHO - This site is listed on the online Enforcement and Compliance History Online database managed by the EPA. No violations were listed on this database.

5.2 Agency File Review/Other Available Records

No other records or reports were reviewed.

5.3 Fire Department

ECCI did not interview the Crossett Fire Department to see if they have been to the subject property for any fires or chemical releases. The subject property has been used historically for timber production.

5.4 Health Department

ECCI did not contact the Ashley County Health Unit of the Arkansas Department of Health regarding any responses the department has had at the property, because of the historical use of the property.

5.5 Specialized Information, Prior Reports and Other Documentation

ECCI did not use any specialized information, prior reports or other documentation in the preparation of this report.

5.6 Physical Setting Source(s)

The ASTM Standard requires that the USGS Topographic Map for the subject property be reviewed as standard practice. The target property address is located in the Crossett North and Crossett South, Arkansas Quadrangles. The map is shown as Figure 3-1 of this report. The property is located at roughly 170 feet above mean sea level.

5.6.1 Surface Water Characteristics

The site investigation and review of the USGS topographic maps found that the property gradient is generally to the west-northwest.

5.6.2 Groundwater and Soil Characteristics

Groundwater flow direction and velocity is determined by using site-specific geologic and soil strata data. Other information, such as geologic age identification, rock stratigraphic unit, and soil characteristic data is also used to

determine groundwater characteristics. General groundwater flow for the site is not reported. The general topographic gradient is to the general south.

Information provided by EDR detailed one Rock Stratigraphic Unit for the area. Geologic information in the general area of the subject property is reported as being of the Cenozoic Era within the Quaternary System and the Pleistocene Series. The Geologic Age Identification category is a stratified sequence.

According to the U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) surveys, there is one soil component occurring on the subject property. The soil type is identified as Henry Soil. The surface soil texture of the Henry soils is that of silt loam. These soils are classified within Hydrological Group D which have very slow infiltration rates. These soils are poorly drained and the corrosion potential for uncoated steel in this type of soil is high. Detailed information on soils data is presented in the EDR Radius Map Report included in Appendix C.

5.6.3 Flood Zone Map

ECCI reviewed the EDR GeoCheck report, and according to the EDR Detail Map, the southwestern portion of the property is located within the 100-year floodplain.

5.7 Historical Use Information on the Property

The subject property is located in Ashley County in the eastern portion of the city of Crossett, Arkansas. The Girl Scout camp is visible on the 1949 aerial photo. The remaining portions of the subject property appear vacant at the time of the 1949 photo. For this report, ECCI utilized historical topographic maps, aerial photos, and other information from EDR and ADEQ.

5.7.1 Aerial Photographs

Historical aerial photos dating back to 1949 depict the character of the site and surrounding areas. Copies of the aerial photographs received from EDR are included in Appendix D. A brief description of each aerial photograph is

presented in Table 5.2 below.

Table 5.2 – Aerial Photograph Descriptions

Year	Description
1949	This aerial photograph depicts the girl scout camp on the northwest portion of the property. The subject property and surrounding lands are otherwise depicted as wooded properties. The Arkansas and Louisiana Missouri Rail Line is visible on the norther boundary. Highway 82 is also visible to the north beyond the rail line. The county roads to the south and east are also present.
1972	This photo depicts the subject and surrounding properties similarly as the previous photos. The roads appeared to have been improved.
1989, 1990, and 1994	The surrounding properties to the north, south, and east have had some development. The subject property appears as it did in the previous photos.
2006	The middle section of the subject property has been clear cut. The Georgia Pacific property located along the rail line along the northeastern portion of the subject property is visible. There has been some development of the properties to the west, north and east.
2010	The southwestern portion of the property has been clear cut. Development has increased in the surrounding properties.
2013 and 2017	The subject and surrounding properties are shown as they appear today.

5.7.2 Topographic Map

Historical topographic maps dated back to 1973 were available and were reviewed for this Phase I ESA. Copies of the topographic maps produced by the USGS were received from EDR. These maps can be found in Appendix D. A brief description of these maps is presented in Table 5.3 below.

Table 5.3 – Topographic Map Description

Year	Description
1973	The map provided by EDR is made up of two quadrangles, North Crossett and South Crossett. The map provided is a 7.5-minute map. The map depicts the Yale Girl Scout Camp on the subject property. The rest of the subject property appears vacant. The rail line, Hwy 82, and the county roads to the south and east are visible. There is some development depicted on the north side of the Hwy 82 where a car dealership exists today. The remaining surrounding properties are drawn as vacant.
1978	This is a 15-minute map titled Hamburg, Arkansas. Hamburg is approximately 13 miles from the subject property. The Yale camp is drawn on this map also. The subject property and the surrounding properties to the west, south and east appear as vacant.
2002	This 7.5-minute map is of the South Crossett quadrangle only. Only the southern most portions of the subject property are visible. The available subject and surrounding properties are drawn as vacant.

Year	Description
2014	This 7.5-minute map is made up from the North Crossett and South Crossett quadrangles. No buildings are depicted on this map. There are no new roads depicted on this map.

5.7.3 Sanborn Fire Insurance Maps

Fire Insurance Maps were produced for urban areas since the late 1800s and were 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 unavailable for the subject property. A copy of the Sanborn Fire Insurance Map report from EDR is presented in Appendix D.

5.8 City Directories

City Directories are a screening tool designed to evaluate potential liability on a target property resulting from past activities at their facility and nearby sites. The City Directory Report includes a search of available city directory data at five year intervals. The City Directories Report lists the occupants on the target street of Hwy 82 West and Yale Camp Road which is the access road on the northwestern portion of the subject property. The report for Hwy 82 West dates back to 1995. The addresses listed in the City Directory appear to be residential in the vicinity of the subject property. A copy of the City Directory Report for that property is presented in Appendix D.

5.9 Historical Use Information on Adjoining Properties

It appears that the subject and surrounding properties were developed for residential, commercial, and industrial uses during the period between 1972 and 1989.

6.0 Site Reconnaissance

6.1 Methodology and Limiting Conditions

Archival research, staff interviews, and visual site inspections were used to obtain the necessary information for preparation of this Phase I ESA. During the visual inspection, ECCI personnel used information gathered from the archival research to

identify possible recognized environmental conditions. Features inspected included: ditches, drains, soils and vegetation. The visual inspection also observed adjoining properties to identify potential sources of contamination that might have migrated or could migrate onto the subject property.

6.2 General Site Setting

On December 5, 2018, Mr. Jeremy Stehle visited the subject property located in Crossett, Arkansas. The purpose of the site visit was to visually and physically observe the property and any structures located on the subject property. During the site reconnaissance, ECCI observed the current condition of the property. The observed conditions are described below.

The subject property is primarily used for timber production. The Yale Girl Scout Camp is located on the northwest portion of the subject property. There is a new city owned, full-time fire station, and industrial properties to the west of the subject property. There is a car dealership and medical offices to the north of Hwy 82 north and east of the subject property. The properties to the south and west are also in timber production. There is a city park to the southwest across the county road from the subject property.

The observations and findings are further noted below. Photographs of the subject property are included in Appendix B.

6.3 Site Reconnaissance Observations

Table 6.1 identifies potential environmental concerns noted during the site reconnaissance. Discussion of these items is presented in the following sections.

Table 6.1 – Site Reconnaissance Observations

Description	Observation		Additional Information
	Yes	No	
Hazardous Substances/Petroleum Products		X	
Storage Tanks (AST and UST)/Boilers		X	
Odors		X	
Pools of Liquid		X	

Description	Observation		Additional Information
	Yes	No	
Drums		X	
Landfills		X	
Unidentified Substances Containers		X	
Potential PCB Equipment		X	
Pits, Ponds, Lagoons, and Surface Impoundments		X	
Stained Concrete, Soil or Pavement		X	
Stressed Vegetation		X	
Solid Waste	X		
Wastewater		X	
Wells		X	
Septic Systems		X	
Trenches and Sumps		X	
Drains and Pipes		X	
Hydraulic Equipment		X	
Other		X	

6.3.1 Solid Waste

Solid waste was found along the county roads that form the southern and western boundaries. The waste found was a dishwasher and indoor plumbing fixtures. Other household trash was also found along the county roads.

7.0 Interviews

The purpose of the interviews conducted during the development of the ESA is primarily to support information obtained during this project.

7.1 Interview with Historical Owner's Representative, Site Manager, Occupant

For this Phase I ESA, ECCI interviewed Mr. Mike Smith, representative of the property. Mr. Smith provided a timeline for the property ownership. The information provided by Mr. Smith was used throughout this report. The completed the Phase I questionnaire contained within Appendix D.

7.2 Interviews with Local Government Officials

ECCI did not contact the Crossett Fire Department to determine if they have responded to any fires or spills onsite due to the historic and current use of the subject property. ECCI did not contact the local health department officials due to the historic and current use of the property.

7.3 Interviews with Local Utilities

The local utilities were not contacted by ECCI for this property because there are no utilities on the property.

8.0 Findings, Opinions, and Conclusions

This ESA has been performed in accordance with ASTM “Phase I Environmental Site Assessment Standards” (ASTM E1527-13) on the a 700-acre tract, located off of Highway 82 West in Crossett, Arkansas. Any exceptions to, or deletions from, this practice are described in Section 9.0 of this report.

During the course of this project, ECCI performed a site reconnaissance, reviewed federal, state, and local records, and interviewed persons familiar with the property to ascertain historical use of the property and surrounding areas. ECCI did not observe any recognized environmental condition, controlled environmental conditions, or historical recognized environmental conditions on the subject property. Information on the findings and conclusions can be found in Table 8.1 below. Further descriptions and a summary of the site characteristics can be found in section 6.0.

Table 8.1 – Summary of Findings, Opinion and Conclusions

FINDINGS	SUMMARY
	There were no spills reported on the subject property or the surrounding property.

FINDINGS	SUMMARY
Primarily Undeveloped Timber Property	OPINION AND CONCLUSION: ECCI did not observe any controlled environmental conditions, historical recognized environmental conditions, or recognized environmental conditions on the subject property.

The western adjacent property (Alvar Resins, Inc.), is identified in the EDR Radius Map Report as large quantity generator of hazardous waste. At the time of site inspection, a large number of totes were observed on the east of the main building. The northeastern adjacent property (Georgia Pacific), historically chipped used railroad ties to be sold as fuel source to other industries. ECCI did not observe any above ground storage tanks, ponds, pits, or lagoons. There were no records indicating that a reportable quantity release had occurred on these sites, however these sites could represent a “material threat” to the 700-acre tract property. Therefore, these sites could be considered to represent a potential material threat.

8.1 Data Gaps

There were no data gaps encountered.

8.2 Additional Investigation

ECCI was not contracted to complete any additional investigations.

9.0 Deviations

This Phase I ESA was performed in general conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E 1527 - 13, “*Environmental Site Assessments: Phase I Environmental Site Assessment*”.

10.0 Additional Services

ECCI was not contracted to perform any additional investigation or services regarding the subject property.

11.0 References

The following people, documents, maps or other publications may have been utilized specifically in the preparation of this Phase I ESA Report or generally in the development of the report format. References to specific documents are also provided in appropriate sections of the report.

Persons Contacted:

- Mr. Mike Smith, Representative, (870) 364-8745

Resources Consulted:

- Federal and State Databases reviewed are listed in the text of the report and in the Environmental Data Resources report.
- www.adeq.state.ar.us

Documents:

- Environmental Data Resources. Radius Map Report, Crossett Economic Development, Crossett, Arkansas, December 6, 2018.
- American Society of Testing and Materials, E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, 2013.

12.0 Environmental Professional Statement

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

We declare that, to the best of our knowledge, we meet the definition of environmental *professional* as defined in §312.10 of 40 CFR Part 312. Résumés for these individuals may be found in Appendix A