

Exhibit BB. T.O. Allen Industrial Park
North Phase I Environmental Site
Assessment





T.O. Allen Industrial Park North Phase I Environmental Site Assessment



Phase I Environmental Site Assessment

Former Allen Estate (Northern Parcel)

22000 Highway 90

Iowa, Louisiana

One Acadiana



Executive Summary

GHD was retained by One Acadiana to complete a Phase I Environmental Site Assessment (ESA) of the northern parcel of the Allen Estates property located at 22000 Highway 90 in Iow, Louisiana (Site). The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs), as defined in ASTM International (ASTM) Standard E1527-13 (the Standard), at the Site. This ESA was conducted to assist One Acadiana in conducting all appropriate inquiries into previous ownership and use of the Site to qualify for specific landowner liability protections under the Comprehensive Environmental Response, Compensation business environmental risk (BER), as defined in the Standard, for the Site. The Phase I ESA Site reconnaissance was conducted by GHD on September 27, 2016.

The Site consists of an approximately 563-acre parcel of rural agricultural land located near Iow, Louisiana. The improvements include a tractor shed, a 10-inch diameter steel irrigation well, a diesel-fired irrigation pump, and a 3,200-gallon diesel above-ground storage tank. According to Site personnel and based on a review of historical documents, the Site was developed as cultivated land prior to the 1930s. A former farmstead consisting of a house, a barn, a warehouse, and tractor shed were located approximately along the south-central portion of the Site. The only structure remaining at the Site at the time of the Site reconnaissance is the 400 square-foot tractor shed. An 1,800 square-foot house was historically located east of the tractor shed. The warehouse was located north of the tractor shed, and the barn was located northeast of the tractor shed. According to the property owner, the house, barn, and warehouse were present on the Site from at least 1968 until approximately 1986 when they were demolished and removed.

Findings and Opinion

Based on the Phase I ESA, including the Site reconnaissance, database search, historical records reviewed, information provided by Site personnel, and interviews, the following findings were identified regarding RECs, historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), BER, and *de minimis* conditions, as defined in the Standard, at the Site:

- i. **Agricultural Chemicals:** Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have historically been used on the Site. Information regarding historical use, storage or application rates was not available. If the chemicals were applied in accordance with manufacturer recommendations, residuals remaining in Site soils would be expected to be similar to other area properties. No information was available to determine whether residual concentrations exceeded government use or exposure criteria. Application of agricultural chemicals for intended use is not considered a release; therefore, potential residuals remaining would not be considered an REC. However, the potential presence of agricultural chemicals may have resulted in Site impairment that may have or could result in adverse impact to Site soil and groundwater. Consideration should be given to the potential presence of these chemicals when evaluating business environmental risk and future land use of the Site.



- ii. **Diesel Above-Ground Storage Tank (AST):** A 3,200-gallon AST, containing diesel is located near the diesel-fired irrigation pump. The diesel tank does not have secondary containment. At the time of the Site reconnaissance, no staining at the base of the tank was observed. According to Site personnel, the AST has been in periodic operation for over 60 years. The AST and visible piping appeared to be in good condition. Site personnel were unaware of any releases that may have occurred from the AST, and the Site was not listed on the databases reviewed as reporting any releases from the AST. No information was found to confirm any releases of petroleum products from the AST to the Site. This issue is not considered a REC. However, based on the length of time the AST has been in operation, the potential for a past release of petroleum products to the Site should be considered when evaluating business environmental risk and future land use for the Site.
- iii. **Historical Farmstead:** The Site was historically developed as a farmstead, with all but a shed having been demolished. No information was available regarding potential use of any hazardous substances or petroleum products, the type of heating, UST or AST use, building demolition, or the presence of a septic system, cesspool, or water wells. While no evidence was found to identify this as a REC, insufficient information was found to evaluate potential adverse impact to soil and groundwater at the Site. However, the presence of the above appurtenances at the historical farmstead on the Site should be considered when evaluating business environmental risk and future land use of the Site.

Conclusions

GHD has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of the Standard of the northern Allen Estate property located at 22000 Highway 90 in Iowa, Louisiana. Any exceptions to, or deletions from this practice are described in Section 1 of this report.

Recognized Environmental Conditions

This assessment has revealed no evidence of RECs (including CRECs) in connection with this Site.

Business Environmental Risk

The following BERs, as described above, have been identified to exist in connection with this Site.

- Agricultural Chemicals
- Diesel AST
- Historical Farmstead:

This summary does not contain all of the information that is found in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided, and to aid in any decisions made, or actions taken, based on this information.



Table of Contents

1.	Introduction.....	1
1.1	Exceptions	2
1.2	Limiting Conditions.....	3
1.3	Significance and Use	3
2.	Site Description and Location	3
2.1	Site Description	3
2.2	Environmental Setting.....	4
3.	Environmental Databases Search and Document Review	4
3.1	Environmental Databases Search	4
3.1.1	Database Listing for the Site	6
3.1.2	Database Listings for Adjoining Properties	6
3.1.3	Additional Area Properties.....	6
3.1.4	Unmapped Properties.....	6
3.2	Historical Records Review	6
3.2.1	Sanborn Fire Insurance Maps	6
3.2.2	Property Title Search.....	7
3.2.3	Historical Aerial Photographs	7
3.2.4	City Directories	8
3.2.5	Historical Topographic Maps	8
3.3	Government Records Review.....	9
3.4	Recorded Environmental Clean-up Liens	10
3.5	User Information	10
3.6	Adjoining Properties.....	10
3.7	Previous Site Investigations/ESAs.....	11
4.	Site Reconnaissance.....	11
4.1	Utility Services	12
4.2	Underground Storage Tanks (USTs).....	12
4.3	Aboveground Storage Tanks (ASTs).....	12
4.4	Raw Material and Chemical Use and Storage.....	12
4.5	Non-Hazardous Waste.....	13
4.6	Hazardous/Universal Waste	13
4.7	Wastewater/Sewers	13
4.8	Stormwater.....	13
4.9	Air Emissions	13
4.10	Polychlorinated Biphenyls (PCBs).....	13
4.11	Spills/Releases	14



4.12	CERCLA Liability Potential	14
5.	Summary of Identified Environmental Issues.....	14
5.1	Findings and Opinion	14
5.2	Conclusions	15
5.2.1	Recognized Environmental Conditions	15
5.2.2	Business Environmental Risk	15
5.3	Data Gaps/Data Failure	15
6.	Environmental Professional Statement.....	16
7.	References	16

Figure Index

Figure 1	Site Location
Figure 2	Site Plan

Appendix Index

Appendix A	Site Photographs
Appendix B	Assessor Qualifications
Appendix C	Environmental Database Search Results
Appendix D	Certified Sanborn Map Report
Appendix E	Historical Aerial Photographs
Appendix F	City Directory Search Results
Appendix G	Historical Topographic Maps
Appendix H	Environmental Lien Report
Appendix I	User Questionnaire
Appendix J	Previous Investigations/Documentation



1. Introduction

GHD was retained by One Acadiana to complete a Phase I Environmental Site Assessment (ESA) of the northern Allen Estate property located at 22000 Highway 90 in Iowa, Louisiana (Site). The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs), as defined in ASTM International (ASTM) Standard E1527-13 (the Standard), at the Site. This ESA was conducted to assist One Acadiana in conducting all appropriate inquiries into previous ownership and use of the Site to qualify for specific landowner liability protections under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) for the Site and to evaluate business environmental risk (BER), as defined in the Standard, for the Site. The Phase I ESA Site reconnaissance was conducted by GHD on September 27, 2016. A Site location map is provided on Figure 1. A Site plan is provided on Figure 2. Photographs taken during the Site reconnaissance are presented in Appendix A.

The Phase I ESA was conducted in general accordance with the Standard for conducting environmental assessments. The assessment included an environmental database search, historical records review, a Site reconnaissance of accessible areas, a review of relevant Site records made available to GHD, and interviews with individuals associated with the Site. This Phase I ESA was prepared by Jeroen Winterink and Charles D. Kizina of GHD, both of whom are environmental professionals, as defined in the Standard. Copies of curricula vitae outlining their qualifications are contained in Appendix B.

The following terms used in this report are defined in the Standard as follows:

- REC means 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 RECs).
- Controlled REC (CREC) is a REC 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 (e.g., property use restrictions, activity and use limitations, institutional controls, or engineering controls).
- Historical REC (HREC) 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 (i.e., property use restrictions, activity and use limitations, institutional controls or engineering controls). HRECs are not RECs.
- BER means a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated by the Standard.



- *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. Conditions determined to be *de minimis* conditions are not RECs or CRECs.

The following tasks were conducted during the assessment:

- Interviews with personnel associated with the Site
- Review of Federal and State environmental databases and historical records (e.g., fire insurance maps, city directory, etc.)
- Review of historical aerial photographs of the Site
- Review of past and current property use and adjoining property occupancy
- Reconnaissance of the facilities, equipment, utility services, operations, and associated Site records
- Observations of conditions that represent releases or threatened (i.e., likely) releases of hazardous substances or petroleum products to the ground, surface waters or groundwater of the Site
- Review of chemical use and storage and spill/release incidents
- Review of the results of any prior reconnaissance conducted at the Site
- Review of waste handling, accumulation, storage, and disposal practices
- Review of air emissions and wastewater discharges
- Review of equipment that potentially contains polychlorinated biphenyls (PCBs)
- Review of aboveground and underground storage tank records
- Review of previous environmental reports prepared for the Site

GHD relied on information received from third parties and during the ESA interviews to the extent that the information was reasonably ascertainable, and also assumed the information received to be accurate unless contradicted by written documentation or field observations.

The following report summarizes the information gathered by GHD during the Phase I ESA and identifies RECs, HRECs, CRECs, BERs, and *de minimis* conditions as defined in the Standard at the Site.

Evaluation of BER issues may involve opining on findings of environmental concern that do not constitute a release of a hazardous substance and/or petroleum product (i.e., non-scope considerations). Such opinions will be found within the body of this report.

1.1 Exceptions

No exceptions to the Standard were taken in completion of this ESA.



1.2 Limiting Conditions

The following limiting conditions were experienced in completion of the Phase I ESA

- Portions of the Site were densely vegetated and could not be traversed or thoroughly observed.

1.3 Significance and Use

This ESA was conducted in a manner consistent with that level of care and skill exercised by members of the environmental engineering and science profession currently practicing under similar conditions, and was based upon the information made available to GHD representatives at the time of this assessment. It remains important to recognize that no Phase I ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with the Site. The performance of the assessment is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a Site. The User, as defined in the Standard, must recognize reasonable limits of time and cost. For the purpose of this Phase I ESA, the User has been identified as One Acadiana Company.

The Phase I ESA has been prepared for the use of One Acadiana and may not be relied upon by any other party without GHD's written consent. In accordance with Section 4.6 of the Standard, this Phase I ESA is viable until March 26, 2017 which is 180 days from the oldest primary component of the ESA.

2. Site Description and Location

2.1 Site Description

The Site consists of an approximately 563-acre parcel of rural agricultural land located near Iowla, Louisiana. The improvements include a tractor shed, a 10-inch diameter steel irrigation well, a diesel-fired irrigation pump, and a 3,200-gallon diesel above-ground storage tank (AST).

According to Site personnel and based on a review of historical documents, the Site was developed as cultivated land prior to the 1930s. A former farmstead consisting of a house, a barn, a warehouse, and tractor shed were located approximately along the south-central portion of the Site. The only structure remaining is the 400 square-foot tractor shed. A 1,800 square-foot house was historically located east of the tractor shed. The warehouse was located north of the tractor shed, and the barn was located northeast of the tractor shed. According to the property owner, the house, barn, and warehouse were present on the Site from at least 1968 until approximately 1986 when they were demolished. No information was available regarding demolition of the farmstead, potential USTs, potential ASTs, wastewater disposal, water supply, chemical use/storage, solid waste generation, or potential hazardous waste generation. Based on a review of aerial photographs, no other buildings were historically located on the Site from at least 1952. Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would



likely have historically been used on the Site. Information regarding historical use, storage, or application rates was not available.

No pits, ponds, lagoons, or areas of stressed vegetation were observed on Site during the Site reconnaissance.

2.2 Environmental Setting

The Site is located in a predominantly rural and residential area in the western portion of Jefferson Davis Parish, Louisiana, and east of Iowa, Louisiana. General topographic gradient at the Site and surrounding area is to the east and to the east-southeast, based on the United States Geological Survey (USGS) topographic map and information provided in the GeoCheck section of the EDR Radius Map reports.

No lakes or ponds are located on Site. Several unnamed drainage ditches cross the Site from the north to south, as does the Louisiana Canal. According to the EDR database reports, the Site is not listed as being in the 100-year or 500-year flood zone.

According to information provided in the GeoCheck section of the EDR Radius Map reports, soils underlying the Site consist of the Crowley Series, Leton Series and Mowata Series. Soil surface texture consists of silt loam which is somewhat poorly drained to poorly drained, with very slow infiltration rates. Based on the general topographic gradient at the Site and the presence of the Louisiana Canal, it is estimated that shallow groundwater beneath the western portion of the Site would flow towards Louisiana Canal, while shallow groundwater beneath the eastern portion of the Site would flow to the east. No Site-specific information was available regarding Site soils, depth to groundwater or groundwater flow direction.

Based on the USGS 7.5-Minute Lacassine, Louisiana Topographic Map, the Site is located at approximately 25 to 30 feet above mean sea level.

3. Environmental Databases Search and Document Review

3.1 Environmental Databases Search

GHD contracted EDR to conduct a search of federal and state environmental databases. Based on the address of the Site and the Site boundaries, the database searches were completed to assist in the identification of RECs in connection with the Site and to assess the likelihood of an impact to the Site from migrating hazardous substances or petroleum products within the approximate minimum search distance (AMSD) specified in the Standard as follows:

Database	Search Radius
National Priority List (NPL)	1 mile
Delisted NPL Database	1 mile
NPL Liens	Site only
Comprehensive Environmental Response, Compensation, and	0.5 mile



Database	Search Radius
Liability Information System (CERCLIS)/ now known as Superfund Enterprise Management System (SEMS)	
CERCLIS No Further Remedial Action Planned (CERC NFRAP)/now known as SEMS-ARCHIVE	0.5 mile
Corrective Action Report (CORRACTS)	1 mile
Resource Conservation and Recovery Act Information (RCRA) Treatment, Storage or Disposal Facility (TSDF)	0.5 mile
RCRA Large Quantity Generator (RCRA-LQG)	Site/Adjoining Property
RCRA Small Quantity Generator (RCRA-SQG)	Site/Adjoining Property
RCRA Conditionally Exempt Small Quantity Generators (RCRA-CESQG)	Site/Adjoining Property
Emergency Response Notification System (ERNS)	Site only
Toxic Chemical Release Inventory System (TRIS)	Site only
US Engineering Controls	0.5 mile
US Institutional Controls	0.5 mile
US Brownfields List	0.5 mile
Superfund (CERCLA) Consent Decrees (Consent)	1 mile
Records of Decision (ROD)	1 mile
Department of Defense (DOD)	1 mile
CERCLA Lien Information (LIENS 2)	Site only
Potential and Confirmed Sites List (SHWS)	1 mile
Solid Waste Facilities (SWF) Landfill (LF) Sites	0.5 mile
Open Dump Inventory (ODI)	0.5 mile
Underground Storage Tank (UST) Facility List	Site/Adjoining Property
Leaking Underground Storage Tank (LUST)	0.5 mile
EDR Recovered Government Archive LUST (RGA-LUST)	0.5 mile
Historical LUST (HIST LUST) Facility List	Site/Adjoining Property
Environmental Liens (Liens)	Site only
Spills	Site only
Spills 90	Site only
Division of Remediation Services Database (REM)	0.5 mile
Institutional and/or Engineering Controls (AUL)	0.5 mile
Voluntary Remediation Program Sites (VCP)	0.5 mile
Drycleaners	0.25 mile
2020 Corrective Action Program List (2020 COR ACTION)	0.5 mile
Risk Management Plan (RMP)	Site only
Indian Reservations	1 mile
Indian UST	Site/Adjoining Property
Indian LUST	0.5 mile
Indian Voluntary Cleanup Priority Listing (Indian VCP)	0.5 mile
Indian ODI	0.5 mile

A copy of the database searches, which includes definitions for the above-referenced databases, are included as Appendix C. It should be recognized that the availability, accuracy and completeness of the record information may vary among information sources, including governmental sources. GHD reviewed information for properties identified within the referenced AMSD. GHD considers a variety of factors in determining which off-Site properties, if any, have the potential to impact the Site. These factors include, but are not limited to, the following:



- Type of database on which a property was identified
- Information presented in the EDR Radius Map report and reasonably ascertainable government databases
- Direction and distance of the property from the Site
- Suspected or known groundwater flow direction at or near the Site
- Likelihood that released contaminants, if any, could migrate to the Site
- Surface and subsurface features (e.g., soil types, utility corridors, etc.)

The following is a summary of the databases searched with the findings as listed.

3.1.1 Database Listing for the Site

The Site address was not listed in any of the aforementioned databases searched.

3.1.2 Database Listings for Adjoining Properties

No adjoining properties were listed in any of the aforementioned databases searched.

3.1.3 Additional Area Properties

No area properties within the effective AMSD of the Site were listed in any of the aforementioned databases searched.

3.1.4 Unmapped Properties

No unmapped properties were listed in the EDR Radius Map report. No unmapped properties were listed in the EDR Radius Map report.

3.2 Historical Records Review

GHD reviewed the following information, where reasonably ascertainable, to identify the historical usage of the Site and adjoining properties.

- Sanborn Fire Insurance Maps
- Property Title Search
- Historical Aerial Photographs
- City Directories
- Historical Topographic Maps

3.2.1 Sanborn Fire Insurance Maps

Sanborn Fire Insurance maps assist in the identification of historical land use and commonly illustrate the existence and location of aboveground and underground storage tanks, structures, improvements, and facility operations. No Sanborn maps were reported to be available for the Site in the EDR Sanborn Library, LLC collection.



A copy of the Certified Sanborn Map reports is presented in Appendix D.

3.2.2 Property Title Search

Property title information for the Site was not available from One Acadiana.

3.2.3 Historical Aerial Photographs

Aerial photographs assist in the identification of Site features and outdoor activities of potential environmental concern. Aerial photographs of the Site for the years 1952, 1971, 1981, 1985, 1990, 1994 1998, 2004, 2005, 2006, 2007, 2009 and 2010 were available from EDR and were reviewed by GHD. The specific details observed at the Site and adjoining properties are dependent on the scale and quality of the aerial photographs reviewed. The aerial photographs were reviewed at a scale of one inch equals approximately 500 feet, except for the 1990 and 2004 aerial photographs which were reviewed at a scale of one inch equals approximately 750 feet. Following is a summary of observations based on the review of the aerial photographs.

- 1952: The 1952 aerial photograph depicts the Site as vacant land and the adjoining properties as vacant sparsely vegetated land. A railroad track (currently Union Pacific/BNSF) borders the northern Site boundary, and a second railroad track borders the western Site boundary. A road (current US Highway 90) borders the southern Site boundary. Several north-south flowing streams, and a man-made canal (Louisiana Irrigation Canal) cross the Site. A farmstead is located on the southern boundary of the Site, near the center of the Site.
- 1971: The 1971 aerial photograph depicts the Site and adjoining properties in a configuration similar to the 1952 aerial photograph. An additional structure has been constructed northeast of the farmstead on the 600-acre parcel. Residential properties and a business (currently G&H Outdoor Store) are depicted near the western boundary of the Site.
- 1981: The 1981 aerial photograph depicts the Site and adjoining properties in a configuration similar to 1971 aerial photograph. Additional structures are depicted to the west of the southwest corner of the Site. A pipeline right-of-way is depicted crossing the Site southeasterly from the northwest corner of the Site. A pond or pit is located near the Louisiana Irrigation Canal. Grain silos are present at the farmstead across US Highway 90
- 1985: The 1985 aerial photograph depicts the Site buildings in a configuration similar to the 1981 aerial photograph, with the exception of the building northeast of the farmstead, which is no longer present. The remainder of the Site and surrounding properties remain in a similar configuration to that observed in the 1981 aerial photograph. A trailer park has been constructed north of the Union Pacific/BNSF railroad track
- 1990: The 1990 aerial photograph depicts the Site and adjoining properties in a configuration similar to the 1985 aerial photograph.



- 1994: The 1994 aerial photograph depicts the Site and adjoining properties in a configuration similar to the 1990 aerial photograph. The farmstead at the Site, with the exception of a small shed, is no longer present.
- 1998: The 1998 aerial photograph depicts the Site and adjoining properties in a configuration similar to the 1994 aerial photograph. A power substation is depicted south of US Highway 90, west of the former farmstead. Additional residential properties have been constructed south of US Highway 90. Additional silos have been constructed at the farmstead south of the Site.
- 2004-06: The 2004, 2005 and 2006 aerial photographs depict the Site and adjoining properties in a configuration similar to the 1998 aerial photograph.
- 2007-10: The 2007, 2009 and 2010 aerial photographs depict the Site and adjoining properties in a configuration similar to the 2006 aerial photograph. A right-of-way for the Kinder Morgan pipeline is depicted across the western portion of Site. An aggregate storage facility is depicted north of the Union Pacific/BNSF railroad track near the northeast corner of the Site.

Copies of reviewed aerial photographs of the Site are presented in Appendix F.

3.2.4 City Directories

A city directory search was conducted by EDR from the first available directory to the present. Directories were available and were reviewed by EDR at approximately 5-year intervals beginning in 1993 and ending in 2013.

According to EDR, city directory coverage was not available for the Site address.

A copy of the city directory searches for the Site address are presented in Appendix G.

3.2.5 Historical Topographic Maps

Historical topographic maps were reviewed to assist in the identification of historical land use, to document the general development of the Site and properties in the vicinity of the Site, and to identify potential on-Site fill activities. Historical topographic maps of the Site and surrounding areas for the years 1946, 1955, 1971, 1985, and 2012 were available from EDR and were reviewed by GHD. The 1946 topographic map was reviewed at a scale of 1:31680, the 1955 and 1971 topographic maps were reviewed at a scale of 62500 and the remaining topographic maps were reviewed at a scale of 1:24000. Due to the size of the Site, two maps were generally provided for each reviewed. Following is a summary of observations based on review of the historical topographic maps.

- 1946: The 1946 topographic maps depict the Site as vacant vegetated land. The Southern Pacific railroad borders the northern boundary, the Missouri Pacific railroad borders the western boundary, and a roadway is indicated at the current location of US Highway 90 along the southern boundary of the Site. The Louisiana Canal bisects the Site from north to south. Several small structures are depicted along both sides of US Highway 90.



- 1955: The 1955 topographic map depicts the Site remaining as vacant land. Several structures (on-Site farmstead) are depicted near US Highway 90 east of the Louisiana Irrigation Canal.
- 1971: The 1971 topographic maps depict the Site remaining as vacant land. A pipeline is shown crossing the Site from near the southwest corner to the Site boundary north of the farmstead.
- 1985: The 1985 topographic maps depict the majority of the Site as vacant land with several buildings at the location of the former farmstead. A flume is depicted east of the Louisiana Irrigation Canal and a second flume is depicted near the northeast corner of the Site. Additional structures are depicted to the west and additional farmsteads are depicted south of the Site.
- 2012 The 2012 topographic maps depict the Site in a similar configuration as the 1985 topographic maps

It should be noted that topographic maps do not always accurately depict structures and development as of the date of the map.

Copies of reviewed historical topographic maps of the Site are presented in Appendix H.

3.3 Government Records Review

GHD submitted FOIA requests for the Site address to:

- The Lacassine Volunteer Fire Department
- Louisiana Department of Environmental Quality (LDEQ)
- Louisiana Department of Natural Resources (LDNR)

Environmental records associated with utilities (i.e., septic systems, wells, etc.), hazardous and solid waste, water, air, remediation, emergency responses, spills/releases, underground and aboveground storage tanks were requested. It should be noted that summarized information received from the agencies is not intended to be all inclusive of the complete files obtained from the agencies; but only to briefly summarize significant findings.

Additionally, GHD conducted a search on the U.S. EPA's MyPropertyInfo website to determine if information was available based on the Site address. The Site address was not listed on the U.S. EPA MyPropertyInfo website.

GHD conducted a search of the Strategic Online Natural Resources Information System (SONRIS) online database maintained by the LDNR. According to the database search, there are no reported compliance issues associated with the Site.

GHD conducted a search of the ECHO website. GHD's search on the U.S. EPA ECHO website found no information pertaining to the Site.

GHD contacted the Lacassine Volunteer Fire Department regarding any records of USTs or spills at the Site. According to Chief Shane Johnson there are no records of USTs or spills at the Site.



GHD conducted a search of the Electronic Data Management System (EDMS) online database maintained by the LDEQ. According to the database search, there are no reported compliance issues associated with the Site.

3.4 Recorded Environmental Clean-up Liens

GHD contracted EDR to conduct a search of environmental liens and activity and use limitations (AULs) associated with the ownership or occupation of the (Parcel Identification Number: 800007200).

Based on documentation provided by EDR, Linda Allen Lotz and Steven Lotz purchased the Site from Samuel W. Allen and Judith Lantz Allen on June 4, 1991 (date recorded).

The environmental lien and AUL search conducted by EDR indicated that no environmental liens or AULs were recorded for the Site (as of October 14, 2016).

The Site address was not listed in the EDR Radius Map report as having any environmental liens or AULs. Site personnel were unaware of any environmental liens or AULs associated with the Site address.

A copy of the EDR Environmental Lien and AUL Search Report is provided in Appendix I..

3.5 User Information

A User Questionnaire was submitted to Mr. Zach Hager of One Acadiana for completion to address certain User responsibilities in accordance with the Standard. Mr. Hager completed the User Questionnaire, a copy of which is provided in Appendix J. The answers to the User Questionnaire were considered when determining the findings of this report.

3.6 Adjoining Properties

The Site is bordered by the following properties:

North: By a Union Pacific/BNSF Rail Line and beyond by vacant land, Treasure Wood Trailer Park, and A New Rock Company

East: By a BNSF Rail Yard and beyond by agricultural land

South: By US Highway 90 and beyond by agricultural land and residential properties

West: By residential properties and G&H Outdoor Store

No activities were observed on the adjoining properties during the Site reconnaissance, as viewed from the Site and publicly accessible areas that appeared to pose an obvious risk of migration of hazardous substances or petroleum products to the Site. No evidence of gas or oil wells, water supply wells, or bulk chemical/petroleum storage was observed on properties adjoining the Site.

Based on available information, no adjoining properties were listed in the EDR Radius Map report regarding the use or storage of hazardous substances or petroleum products that pose a risk of migration to the Site. Based on the review of historical aerial photographs, city



directories, and historical topographic maps, no operations or conditions that would typically result in a release of hazardous substances or petroleum products were identified relative to the Site.

Individuals associated with the Site were unaware of the release or likely release of hazardous substances or petroleum products that would potentially migrate to the Site from the adjoining properties.

Based on the above, no FOIA requests were submitted to local, state, or federal regulatory agencies for the adjoining properties.

Based on the available information reviewed during this Phase I ESA, no adjoining properties were identified that pose an obvious risk of groundwater or soil vapor migration of hazardous substances or petroleum products to the Site that require further evaluation.

3.7 Previous Site Investigations/ESAs

The following previous ESAs or environmental investigative reports were prepared for the Site and were provided by for GHD review:

- Phase I Environmental Assessment for the Site prepared by GHD Services, for Bakken Oil Express (BOE) & E-Rail Commerce, dated August 31, 2015

Phase I ESA, GHD, August 31, 2015

At the time of the August 31, 2015 Phase I ESA, the Site was agricultural land with the current tractor shed, well pump and fuel AST. BOE concluded that no RECs were identified to exist at the Site.

A copy of the text, tables and figures from the previous ESA is presented in Appendix J.

4. Site Reconnaissance

On September 27, 2016, Jeroen Winterink of GHD completed a reconnaissance of the property and building that comprise the Site. The visit included a reconnaissance of the Site and Site structure, review of relevant Site records available to GHD, visual observations of adjoining properties as viewed from the Site and surrounding roadways, and interviews with individuals associated with the Site. GHD was not accompanied during the Site reconnaissance. A subsequent telephone interview was conducted using a prepared questionnaire covering environmental and other Site-related topics. GHD employs a systematic approach to the Site reconnaissance process that seeks to obtain information indicating the likelihood of identifying RECs in connection with the Site, including both exterior observations and those associated with the interior of structures, as applicable on the Site. Any significant obstructions encountered during the Site reconnaissance were previously identified in Section 1.

A telephone interview was conducted with Gayle Godeaux, Site owner representative, on October 23, 2016. Ms. Godeaux, was identified as the key Site manager to be interviewed.



Ms. Godeaux has been associated with the Site for over 50 years, and provided information regarding Site operations and historical Site use.

4.1 Utility Services

According to Ms. Godeaux, potable water is not currently supplied to the Site. An on-Site irrigation well is located west of a dirt road extending north of US Highway 90. According to Ms. Godeaux, the well is in working condition. According to the EDR database report, the 10-inch diameter steel irrigation well was installed in 1953.

According to Site personnel, no drinking water supply, oil/gas, monitoring, or dry wells are currently or were historically present on the Site. No evidence of any oil/gas, monitoring, dry wells or other water supply wells was observed by GHD during the Site inspection.

According to Ms. Godeaux, no septic systems are currently present on the Site and a septic system was in use when the farmstead was present at the Site. According to Ms. Godeaux, the septic system was removed in the late 1980s. No evidence of any septic systems was observed by GHD during the Site reconnaissance.

Electricity and natural gas service is available along Highway 90.

4.2 Underground Storage Tanks (USTs)

According to Site personnel, no USTs are currently located at the Site or are known to have previously been located on the Site. No evidence of USTs (e.g., vent pipes, fill ports, etc.) was observed by GHD during the Site reconnaissance. The Site was not listed in the databases searched as having any USTs or releases therefrom.

4.3 Aboveground Storage Tanks (ASTs)

According to Ms. Godeaux and based on the Site reconnaissance, an AST is present at the Site. The following table lists the location and observations of the non-process-related AST.

AST #	Contents	Capacity (Gallons)	Location	Description
1	Diesel (empty)	3,200	Near diesel pump for irrigation well	Single steel wall, good condition w/steel supports, but no secondary spill containment

When required, bulk diesel fuel is delivered to the Site via tank truck. Any release from the AST that was not localized could discharge to the Louisiana Irrigation Canal located approximately 50 feet east of the diesel tank. The diesel fuel AST was empty at the time of the Site reconnaissance. No staining was observed beneath the diesel AST.

4.4 Raw Material and Chemical Use and Storage

No chemicals were observed at the Site by GHD during the Site reconnaissance. GHD did not observe the storage of any raw materials or chemicals in the shed located near US Highway 90. According to Site personnel, the shed was used for the storage of a tractor. No



soil staining or distressed vegetation in the vicinity of the shed was observed by GHD during the Site reconnaissance.

4.5 Non-Hazardous Waste

Based on observations during the Site inspection, no non-hazardous waste is currently generated on Site. According to Site personnel, no non-hazardous wastes have been disposed on Site. No evidence of the on-Site disposal of non-hazardous waste was observed by GHD during the Site reconnaissance or in the aerial photographs reviewed

4.6 Hazardous/Universal Waste

According to Site personnel, the Site does not generate any hazardous wastes. No evidence of the on-Site generation or management of hazardous waste was observed by GHD during the Site reconnaissance. The Site is not listed in the databases reviewed as a hazardous waste generator or management facility.

4.7 Wastewater/Sewers

According to Site personnel, no wastewater is currently generated or discharged on Site. As described in Section 4.1, sanitary wastewater generated at the former farmstead was discharged to a sanitary septic system which was reportedly removed in the late 1980s.

4.8 Stormwater

Stormwater generated at the Site infiltrates undeveloped Site surfaces or flows via sheet flow to one of the four drainage canals that cross the Site.

No evidence of outdoor storage of materials or industrial activity with the potential to impact stormwater runoff quality was observed by GHD during the Site reconnaissance, except for the diesel AST without containment.

4.9 Air Emissions

According to Site personnel and based on GHD 's observations, the only air emissions from the Site are associated with the diesel-fired irrigation pump.

4.10 Polychlorinated Biphenyls (PCBs)

Electricity is not currently provided to the Site. Jefferson Davis Electric Cooperative provides electrical service in the vicinity of the Site. Several pole-mounted transformers are located along US Highway 90 to provide electricity to the adjoining property. None of the transformers were observed to have labels indicating PCB content, and none of the transformers were observed as being stained or as having evidence of any leakage of dielectric fluid. The transformers are owned by the utility and the utility would be responsible for any reporting, inspections, testing, or release response. No potential PCB-containing equipment was observed on Site by GHD during the Site reconnaissance.



4.11 Spills/Releases

According to Site personnel, no spills or releases of hazardous substances or petroleum products have occurred at the Site. No obvious evidence of any spills or releases of hazardous substances or petroleum products was observed by GHD during the Site reconnaissance. No evidence of any exterior staining or distressed vegetation was observed during the Site reconnaissance. The Site was not listed in the ERNS or Spills databases.

4.12 CERCLA Liability Potential

The Site is not listed on the NPL or in the State Hazardous Waste Sites Database. The Site has never defended any environmental-related claims or litigation asserted by any governmental agency or third party, and no potential claims or litigation presently exist to the best knowledge of Ms. Godeaux. According to Ms. Godeaux, the Site has never received notification from any government agency or third party of liability as a potential responsible party for any hazardous waste treatment, storage, or disposal Site..

5. Summary of Identified Environmental Issues

5.1 Findings and Opinion

Based on the Phase I ESA including the Site reconnaissance, database search, historical records reviewed, information provided by Site personnel, and interviews, the following findings were identified regarding RECs, HRECs, CRECs, BERs, and *de minimis* conditions as defined in the Standard, at the Site:

- I. **Agricultural Chemicals:** Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have historically been used on the Site. Information regarding historical use, storage or application rates was not available. If the chemicals were applied in accordance with manufacturer recommendations, residuals remaining in Site soils would be expected to be similar to other area properties. No information was available to determine whether residual concentrations exceeded government use or exposure criteria. Application of agricultural chemicals for intended use is not considered a release; therefore, potential residuals remaining would not be considered an REC. However, the potential presence of agricultural chemicals may have resulted in Site impairment that may have or could result in adverse impact to Site soil and groundwater. Consideration should be given to the potential presence of these chemicals when evaluating business environmental risk and future land use of the Site.
- II. **Diesel Above-Ground Storage Tank (AST):** A 3,200-gallon AST, containing diesel is located near the diesel-fired irrigation pump. The diesel tank does not have secondary containment. At the time of the Site reconnaissance, no staining at the base of the tank was observed. According to Site personnel, the AST has been in periodic operation for over 60 years. The AST and visible piping appeared to be in good condition. Site personnel were unaware of any releases that may have occurred from the AST, and the



Site was not listed on the databases reviewed as reporting any releases from the AST. No information was found to confirm any releases of petroleum products from the AST to the Site. This issue is not considered a REC. However, based on the length of time the AST has been in operation, the potential for a past release of petroleum products to the Site should be considered when evaluating business environmental risk and future land use for the Site.

- III. **Historical Farmstead:** The Site was historically developed as a farmstead, with all but a shed having been demolished. No information was available regarding potential use of any hazardous substances or petroleum products, the type of heating, UST or AST use, building demolition, or the presence of a septic system, cesspool, or water wells. While no evidence was found to identify this as a REC, insufficient information was found to evaluate potential adverse impact to soil and groundwater at the Site. However, the presence of the above appurtenances at the historical farmstead on the Site should be considered when evaluating business environmental risk and future land use of the Site.

5.2 Conclusions

GHD has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of the Standard of the northern parcel of the Allen Estates Site located at 22000 Highway 90 in Iowa, Louisiana. Any exceptions to, or deletions from this practice are described in Section 1 of this report.

5.2.1 Recognized Environmental Conditions

This assessment has revealed no evidence of RECs (including CRECs) in connection with this Site.

5.2.2 Business Environmental Risk

The following BERs, as described above, were identified to exist in connection with this Site.

- Agricultural Chemicals
- Diesel AST
- Historical Farmstead

5.3 Data Gaps/Data Failure

A data gap, as defined in the Standard, is an absence of information that affects the ability of the environmental professional to identify RECs. Data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met. Data failure is not uncommon in trying to identify the use of the Site at 5 year intervals back to first use or 1940 (whichever is earlier). The following data gap was identified in this Phase I ESA.

- **Historical Source Interval:** Standard historical sources reviewed for this ESA were not available at the 5-year intervals described in Section 8.3.2.1 of the Standard. Additional



information sources were not considered reasonably ascertainable. Based on the consistent historical use of the Site as undeveloped land, it is unlikely that additional information would impact the conclusions of this report.

6. Environmental Professional Statement

This Phase I ESA was completed by or under the direct supervision of an Environmental Professional (EP), who to the best of our professional knowledge and belief, meets the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. The EP has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed all appropriate inquiries (AAI) in conformance with the standards and practices set forth in 40 CFR Part 312. Under the final AAI Standard, certain aspects of the Phase I ESA (interviews, on-site visual reconnaissance, the historical records review, and the search for environmental liens) may require an update if the timeframe between their completion and acquisition of the Site exceeds 180 days.

7. References

- ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.
- The EDR Radius Map™ Report with GeoCheck®, 22000 Highway 90 Street, Iowa, Louisiana, dated October 5, 2016
- Certified Sanborn® Map Report, 22000 Highway 90 Street, Iowa, Louisiana, EDR, dated October 5, 2016
- The EDR Aerial Photo Decade Package, 22000 Highway 90 Street, Iowa, Louisiana, dated October 6, 2016
- The EDR-City Directory Abstract, 22000 Highway 90 Street, Iowa, Louisiana, dated October 5, 2016
- EDR Historical Topographic Map Report, 22000 Highway 90 Street, Iowa, Louisiana, dated October 5, 2016
- The EDR Environmental Lien Search, Parcel Numbers: 01-03-300-005 and 01-01-400-010, Iowa, Louisiana, dated October 14, 2016
- Telephone interview with Ms. Godeaux on October 23, 2016
- United States Environmental Protection Agency MyPropertyInfo website



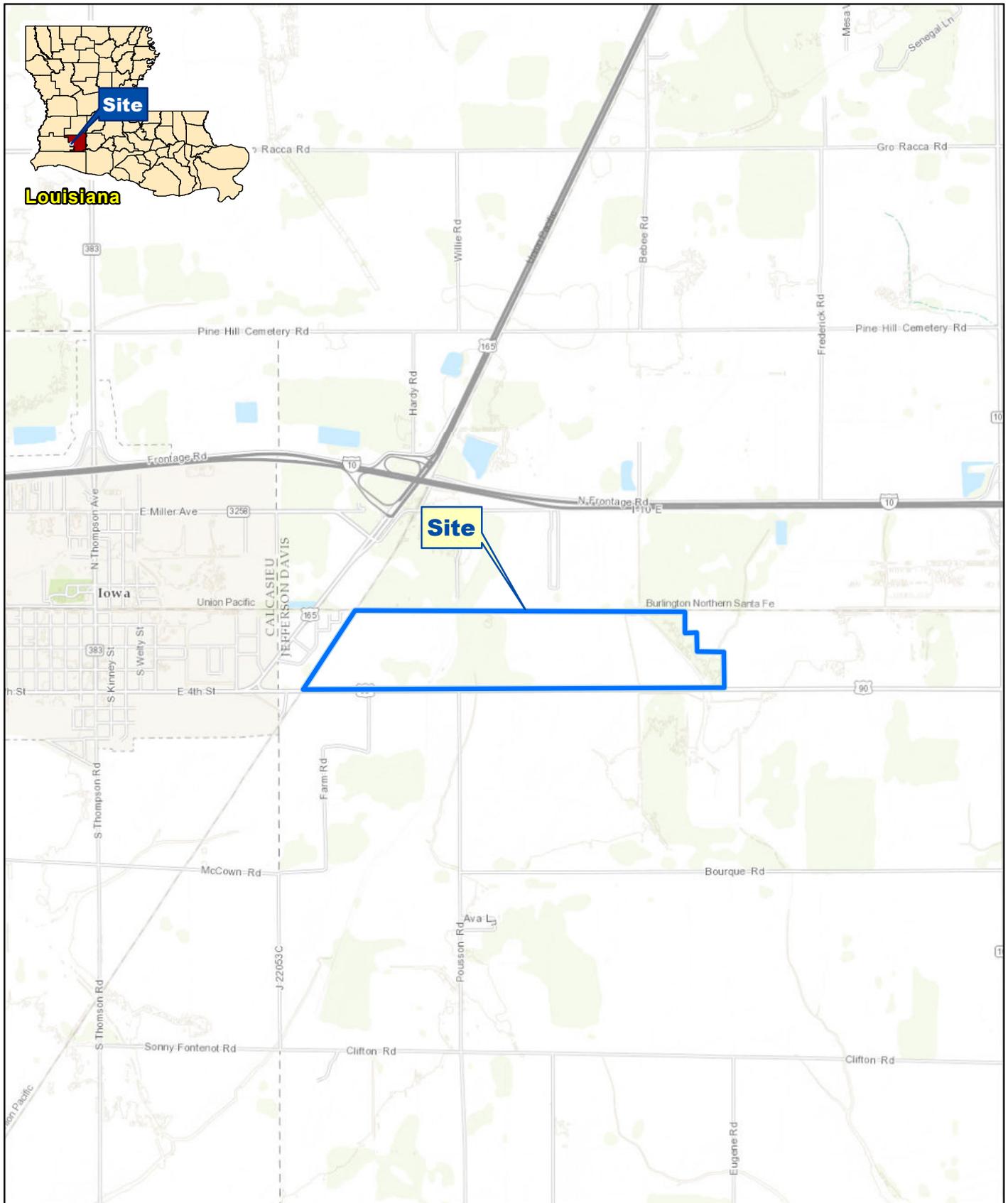
All of Which is Respectfully Submitted,
GHD

A handwritten signature in blue ink, appearing to read 'Jeroen'.

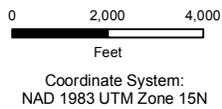
Jeroen Winterink

A handwritten signature in blue ink, appearing to read 'Charles D. Kizina'.

Charles D. Kizina



Source: ESRI World Topographic Maps.

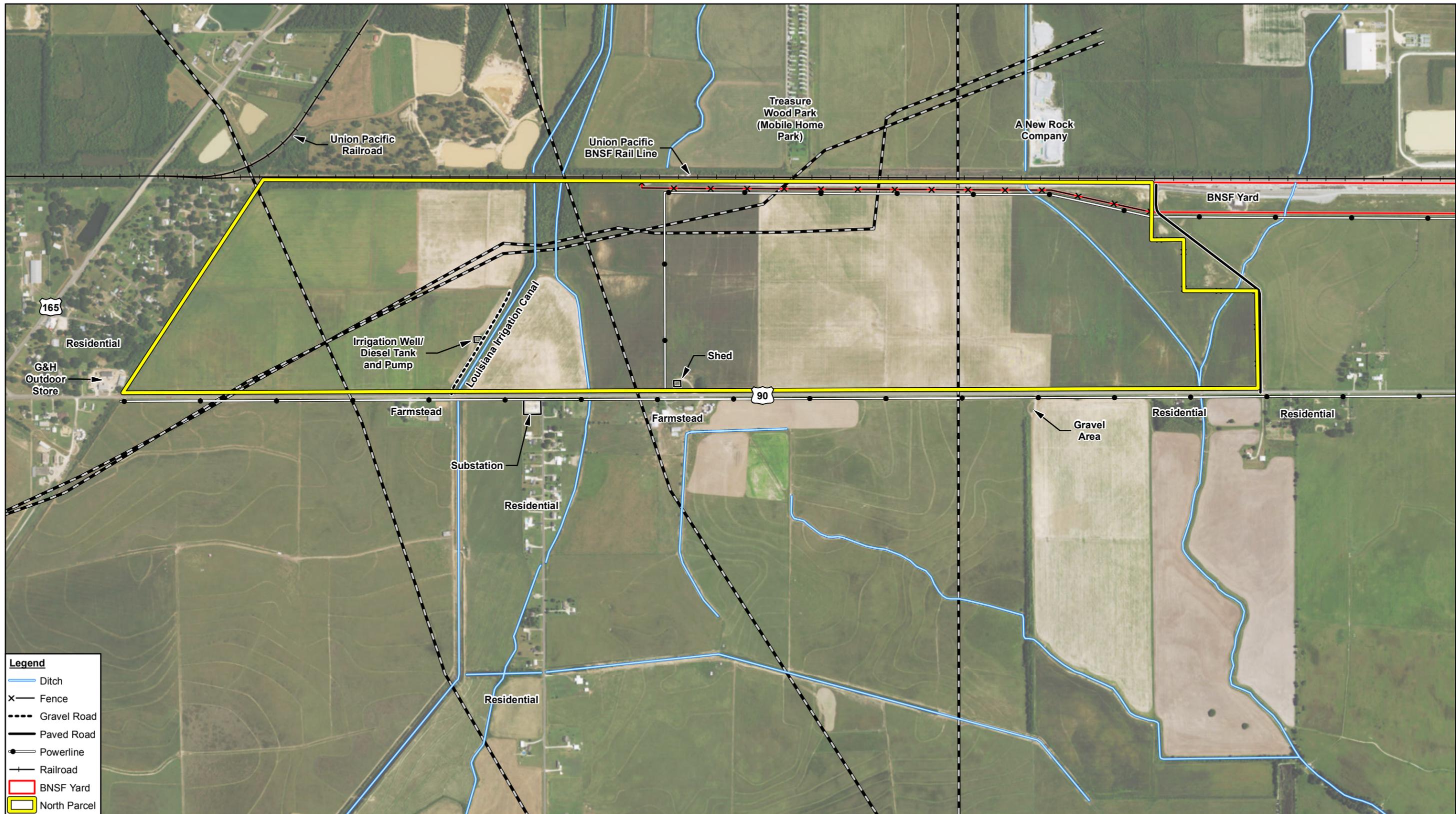


IOWA, LOUISIANA
ALLEN ESTATE - NORTH PARCEL

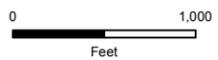
Oct 21, 2016

VICINITY MAP

FIGURE 1



Source: ESRI World Basemap Imagery Service.



Coordinate System:
NAD 1983 UTM Zone 15N



IOWA, LOUISIANA
ALLEN ESTATE - NORTH PARCEL

SITE MAP

11119657-00
Oct 21, 2016

FIGURE 2