

**Exhibit Q1: Phase I Environmental Assessment Introduction
Industrial Park East**



**PHASE I ENVIRONMENTAL SITE ASSESSMENT
OF 365 ACRE TRACT
HIGHWAY 397 AND SWIFT PLANT ROAD
LAKE CHARLES, LOUISIANA**

Prepared for:

**Lake Charles Harbor and Terminal District
P. O. Box 3753
Lake Charles, Louisiana 70602**

September 16, 2010

Prepared by:

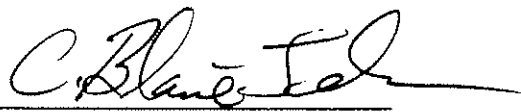
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SUMMARY

Arabie Environmental Solutions, Inc. (Arabie Environmental) conducted a Phase I Environmental Site Assessment (ESA) of a 365-acre tract located on the corner of Swift Plant Road and Highway 397 in Lake Charles, Louisiana. The property is located in a developed area of east Lake Charles. The majority of the investigated property is vacant and utilized for the grazing of cattle. An operating industrial facility, Spartech, is located in the center of the property. A mobile home is located on the northeast corner of the property. Dirt work is being done on the former FEMA mobile home site. Two recognized environmental conditions were noted on the investigated property.

- Five drums were located on the northeast section of the property. These drums are in poor condition and are approximately ½ full of motor oil. No leaks or staining was observed on the drums at the time of the inspection. One drum of herbicide was located east the oil drums. Labels on this drum indicated that it contained a compound call Brash and that it is classified as a hazardous waste by the EPA. This drum was in good condition with no leaks observed. It is recommended that these drums be removed from the property and properly disposed of offsite.
- Spartech is an operating industrial facility located on the investigated property. Spartech takes raw plastic and rubber compounds from an offsite supplier and mixes resins, additives, and pigments to the compounds. Plastic or rubber compounds with different additives could be spilled on the property in the event of a malfunction or problem with the operating systems. Also, hydraulic oil from the process areas or oil from pumps and motors could be released on to the investigated property. The existence of hazardous substances at the facility results in the fact that there is the material threat of a release of these substances to the property. However, visual inspection and regulatory file review indicated no evidence of a release.

Two noteworthy items were identified during the course of this investigation. The first was former pit identified on the property, west of James E. Suddeth Parkway. The pit was likely used for soil borrow purposes and has been filled as confirmed by visual inspection of the tract. A review of local municipal records revealed no evidence of a permit being issued for the pit. The purpose of the pit could not be confirmed nor could the materials used to fill the pit. Investigation activities out the scope of this Phase I ESA would need to be performed to further evaluate the past use and current condition of the filled pit.

The second item is two pipelines located on the property. One pipeline is a natural gas pipeline owned by Gulf South. The right-of-way was maintained through periodical mowing. No signs of releases or spills were noted on the right-of-way. The other pipeline is an abandoned six-inch crude oil line owned by Shell. Conversations with Shell personnel indicated that most of this pipeline has been excavated; however, some of the pipeline still remains underground. It is unclear whether any portion of the pipeline is still buried on the investigated property.

1.0 INTRODUCTION

Arabie Environmental was retained by the Lake Charles Harbor and Terminal District to conduct a Phase I ESA. The Phase I ESA was conducted on a 365-acre tract located on the corner of Swift Plant Road and Highway 397 in Lake Charles, Louisiana.

1.1 PURPOSE

The purpose of this investigation was to identify recognized environmental conditions present at the site. A recognized environmental condition is defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. This definition is taken from the American Society for Testing and Materials (ASTM) Standards on Environmental Site Assessments for Commercial Real Estate, as specified in E 1527-05 (November, 2005).

1.2 DETAILED SCOPE-OF-SERVICES

Prior to performing the site reconnaissance, an environmental database search was conducted. A United States Geological Survey topographical map and historical aerial photographs were reviewed to determine elevations, composition of surrounding properties, and possible sources of environmental concern. Upon review of the environmental database report, maps, and historical aerial photographs, the site reconnaissance was performed on the investigated tract. The site reconnaissance was performed by closely inspecting the tract for possible sources of environmental concern. Upon completion of the visual inspection of the tract, a driving tour was conducted within a 1.0-mile radius of the investigated tract to determine additional possible sources of environmental concerns, which have the possibility to impact the investigated property.

Upon completion of the site reconnaissance, interviews with landowners and state regulatory agencies were conducted to determine any additional environmental concerns associated with the investigated tract.

1.3 SIGNIFICANT ASSUMPTIONS

At the time of this Phase I ESA, there were no facilities or structures identified on or adjacent to the investigated tract, which would cause any significant assumptions to be made regarding the condition of the property.

1.4 LIMITATIONS AND EXCEPTIONS OF THE STUDY

The findings and opinions of Arabie Environmental are based, in part, on data and information provided by others. Arabie Environmental has identified the sources of such information, but makes no warranty or guarantee regarding the accuracy or completeness

of such data, the information obtained, or the conclusions solely based on such data.

Environmental assessments and other preliminary investigations are, by their nature, limited investigations. Arabie Environmental neither guarantees nor warrants that the site is free of toxic or hazardous wastes, or other environmental risks that further investigation might reveal. Additionally, the scope of this Phase I ESA does not constitute an evaluation of the environmental compliance record, requirements, or status of this site.

In addition, the activities of the Phase I ESA have been conducted for the sole purpose of gathering information pertinent to identifying recognized environmental conditions. This assessment does not address physical and working conditions of site improvements and/or buildings, including but not limited to structures, roof foundations, electrical and plumbing systems, air conditioning/heating systems, on-site sanitary sewer systems, and storm drainage.

1.5 SPECIAL TERMS AND CONDITIONS

There are no special terms or conditions, which are applicable to this Phase I ESA.

1.6 USER RELIANCE

No information obtained in performing this Phase I ESA is suspected to be incorrect, skewed, or inaccurate.

2.0 SITE DESCRIPTION

2.1 LOCATION AND LEGAL DESCRIPTION

The investigated property is located along Swift Plant Road and Highway 397, at latitude 30° 13' 13.4" and longitude -93° 7' 52.3". The tract is located in Sections 1 and 12, Township 10 South, Range 8 West, Calcasieu Parish, Louisiana. A legal description of the property including the Calcasieu Parish Police Jury Department of Public Works and Animal Control (CPPJ) facility is attached to the report in Appendix A. However, the CPPJ facility is not part of this assessment.

A site location map included as Figure 1 and a Site Sketch included as Figure 2, are located in Appendix A of this report.

2.2 SITE AND VICINITY CHARACTERISTICS

The investigated property is located in east Lake Charles, Southwest of the intersection of Swift Plant Road and Highway 379. The properties in the vicinity of the investigated tract are a mixture of residential, commercial and vacant properties.

2.3 CURRENT USES OF THE PROPERTY

The majority of the investigated property is currently pasture land utilized for cattle grazing. Dirt moving and grading activities are being done on the former FEMA mobile home site. Spartech, an industrial facility, is located in the center of the property. A residential home site is located on the northeast corner of the property.

2.4 DESCRIPTIONS OF STRUCTURES, ROADS, OTHER IMPROVEMENTS ON THE SITE

Municipal water, electricity, natural gas, and sewage utilities are present on the investigated property. James E. Suddeth Parkway travels north/south through the center of the property. Cattle pens and loading area are located on the northeast section of the property. A mobile home is also located on the northeast corner of the property. Railroad tracks are located on the west side of the property. These tracks are used by the industrial facility located in the center of the investigated property.

2.5 CURRENT USES OF THE ADJOINING PROPERTIES

A mixture of residential and commercial properties is located to the north of the property. South of the investigated site is a commercial development. Highway 397 is located on the eastern border of the property. Residential and commercial properties are located east of Highway 397. West of the investigated property is the CPPJ Public Works and Animal Control facility. Also, west of the property is land occupied by the Calcasieu Parish Department of Corrections and the Chennault International Airport Authority (CIAA).

3.0 USER PROVIDED INFORMATION

The information contained in Section 3.0 was based on information provided by Lake Charles Harbor and Terminal District, the user of this report.

3.1 TITLE RECORDS

The property is owned by the Lake Charles Harbor and Terminal District.

3.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS

No environmental liens or use limitations are known to exist.

3.3 SPECIALIZED KNOWLEDGE

Arabie Environmental was not made aware of any specialized knowledge or experiences that are material to recognized environmental conditions in connection with the investigated property.

3.4 COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION

Arabie Environmental was not made aware of any commonly known or reasonably ascertainable information within the local community that is material to recognized environmental conditions in connection to the investigated property.

3.5 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

No valuation reduction of the property, due to hazardous substances, is known to have occurred on the investigated tract.

3.6 OWNER, PROPERTY MANAGER, AND OCCUPANT INFORMATION

The investigated tract is owned by the Lake Charles Harbor and Terminal District.

3.7 REASON FOR PERFORMING PHASE I ESA

This Phase I ESA was performed to identify and understand potential environmental conditions which could potentially impact the investigated tract.

3.8 OTHER

No other information regarding the investigated tract was provided to Arabie Environmental by the report user.

4.0 RECORDS REVIEW

4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

A computer database search of environmental agency file records was conducted for Arabie Environmental by Environmental Data Resources, Inc. (EDR). A copy of the EDR report (Inquiry Number 2844454.1s) is included as Appendix B. Since the investigated property is large in size, the EDR search radius was expanded by one mile to ensure proper coverage by the research database.

4.1.1 National Priorities List Sites

The National Priorities List (NPL) is the Environmental Protection Agency's (EPA) database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program. A site must meet or surpass a predetermined hazard ranking system score, be chosen as a state's top priority site, or meet three specific criteria set jointly by the US Department of Health and Human Services and the EPA to become an NPL Site. The EDR report did not identify any NPL

site within the 2.0-mile search radius of the investigated site.

4.1.2 Delisted NPL Sites

The National Oil and Hazardous Substance Pollution Contingency Plan (NCP) established the criteria that the EPA uses to delete sites from the NPL. Sites may be deleted from the NPL where no further response is appropriate. The EDR report did not identify any sites that have been deleted from the NPL list within the 2.0-mile search radius of the investigated site.

4.1.3 CERCLIS Sites

The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) is a compilation of records regarding those facilities which the U.S. EPA has identified as having actual or suspected uncontrolled releases of hazardous substances, contaminants, or pollutants. Such sites may have been reported to the EPA by states, municipalities, private companies, or private persons and the EPA may have investigated such sites, or an investigation may be in progress. Some of these sites require immediate remedial response and may eventually be placed on the NPL. The EDR report identified two CERCLIS sites within the 1.5-mile search radius of the investigated site. These sites are listed as:

- Rogers Enterprises, located at 5350 East Broad Street, is approximately 0.75-mile northwest of the investigated property. Refer to section 4.5 for additional information pertaining to this property.
- Lake Charles NRG, located at 6309 Leslie Lane, is approximately 1.0-mile northeast of the investigated property.

Due to the distance from the investigated site, it is not anticipated that this site would cause any environmental impacts to the investigated tract.

4.1.4 No Further Remedial Action Planned Sites

The No Further Remedial Action Planned Report (NFRAP) contains information pertaining to sites, which have been removed from the EPA's CERCLIS database. NFRAP sites may be sites where, following an initial investigation, either no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require federal Superfund action or NPL consideration. The EDR report did identify two NFRAP sites within the 1.5-mile search radius of the investigated site. These sites are listed as:

- Groendyke Transport Inc., located at 6273 Highway 90, is approximately 0.88-mile northwest of the investigated property.

- Waste Management of Lake Charles, located at 4935 East Broad Street, is approximately 1.2-mile northwest of the investigated property.

Due to the distance from the investigated site, it is not anticipated that these sites would cause any environmental impacts to the investigated tract.

4.1.5 RCRA-Corrective Action Sites

The Resource Conservation and Recovery Act (RCRA) – Corrective Action (CORRACTS) report contains information pertaining to hazardous waste facilities, including treatment, storage, and disposal (TSD) facilities, which have conducted or are currently conducting a corrective action as required under the RCRA. The EDR report did not identify any CORRACTS sites within the 1.5-mile search radius of the investigated site.

4.1.6 RCRA-TSD Facilities

The Resource Conservation and Recovery Act (RCRA) Facilities database is a compilation by the EPA of facilities, which report treatment, storage, and/or disposal (TSD) of hazardous waste. The EDR report did not identify any RCRA-TSD facilities within the 1.5-mile search radius of the investigated site.

4.1.7 RCRIS Large/Small Quantity Generators

The EPA and the Louisiana Department of Environmental Quality (LDEQ) maintain lists of registered large and small quantity generators of hazardous wastes. The EDR report did identify seven RCRIS generators of hazardous waste within the specified 1.25-mile radius of the investigated site. Two sites were listed as large quantity generators by the EDR report. These sites are listed as:

- Calcasieu Parish Police Jury, located 5540 Swift Plant Road, is approximately 0.56-mile northwest of the investigated property. Refer to section 4.5 for additional information pertaining to this site.
- Enterprise Transportation Company, located at 5625 Broad Street, is approximately 0.62-mile northwest of the investigated property. Refer to section 4.5 for additional information pertaining to this site.

Five sites were listed as small quantity generators by the EDR report. These sites as listed as:

- TETLP-Lake Charles, located at 1284 Highway 397, is approximately 0.13-mile east of the investigated property. Refer to section 4.5 for additional information pertaining to this site.
- Prime Coatings, Inc., located at 5921 Swift Plant Road, is approximately

0.50-mile north of the investigated property.

- Controlled Maintenance, Inc. located at 5716 East Broad Street, is approximately 0.67-mile northwest of the investigated property
- LA Machinery Company, Inc. located at 5415 Broad Street, is approximately 0.70-mile northwest of the investigated property
- Lake Charles Refinery, located at 6309 Leslie Lane, is approximately 1.0-mile northeast of the investigated property.

In addition to these sites, the EDR report also identified nine RCRA Conditionally Exempt Small Quantity Generators (RCRA-CESQG). These sites are listed as:

- Daily Equipment, located at 777 Highway 397, is approximately 0.40-mile northeast of the investigated property.
- Baker Oil Tools, Inc., located at 5432 East Broad Street, is approximately 0.67-mile northwest of the property.
- L & A Body and Fender, located at 5608 Highway 90, is approximately 0.85-mile northwest of the property.
- Groendyke Transport, Inc located at 6273 Highway 90, is approximately 0.88-mile northwest of the investigated property.
- Lake Charles Diesel, Inc. located at 5400 Highway 90, is approximately 0.95-mile northwest of the investigated property.
- Third Coast Speed, LLC, located at 6415 Leslie Lane, is approximately 1.1-mile northeast of the investigated property.
- Signko, Inc., located at 6072 Candice Lane, is approximately 1.1-mile north of the investigated site.
- Southwest RV Camper & Auto Repair, located at 4933 East Broad Street, is approximately 1.2-mile northwest of the investigated property.
- Calcasieu Parish Mosquito Control, located at 1037 Tom Watson Road, is approximately 1.2-mile northwest of the investigated property.

Due to the nature of activities conducted at these sites and the distance from these sites to the investigated property, it is not anticipated that these sites would cause any environmental impacts to the investigated tract.

4.1.8 Emergency Response Notification System

The EPA maintains the Emergency Response Notification System (ERNS), which is a national database system that is used to store information concerning the sudden and/or accidental release of hazardous substances into the environment. The EDR report did not identify the subject property as an ERNS site.

4.1.9 Engineering Control/Institutional Control Sites

The EPA and LDEQ maintain a listing of sites with engineering or institutional 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. 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. The EDR report did not identify any site classified as both an engineering control and institutional control site within the 1.5-mile search radius of the investigated site.

4.1.10 US Brownfield Sites

Included in this listing are brownfields properties addresses by Cooperative Agreement Recipients and by Targeted Brownfields Assessments. EPA's Targeted Brownfields Assessment (TBA) program is designed to help states, tribes, and municipalities, especially those without EPA Brownfields Assessment Demonstration Pilots, minimize the uncertainties of contamination often associated with brownfields. The EDR report did not identify any brownfields site within the 1.5-mile search radius of the investigated site.

4.1.11 State Hazardous Waste Sites

The LDEQ maintains a list of State Hazardous Waste Sites (SHWS). The EDR report identified ten SHWS sites within the 2.0-mile search radius of the investigated site. The sites are listed as:

- Rogers Enterprises, located at 5350 East Broad Street, is approximately 0.75-mile northwest of the investigated property. Refer to section 4.5 for additional information.
- Groendyke Transport, Inc., located at 6273 Highway 90, is approximately 0.88-mile northwest of the investigated property.
- Remadoser Drum Service, located at 6350 Highway 90, is approximately 0.89-mile northwest of the investigated property.

- Lake Charles NRG, LLC, located at 6309 Leslie Lane, is approximately 1.0-mile northeast of the investigated property.
- All Bonds by Lovett, located at 4935 East Broad Street, is approximately 1.2-mile northwest of the investigated property.
- Neff Rental Services, Inc., located at 5117 East Highway 90, is approximately 1.2-mile northwest of the investigated property.
- L & L Environmental Services, Inc. located at 5117 East Highway 90, is approximately 1.2-mile northwest of the investigated property.
- Northrop Grumman Corporation, located at 4400 Sen. J. Bennett Johnson Blvd., is approximately 1.7-mile west of the investigated property.
- City of Lake Charles Landfill, located at 1800 North Shattuck Street, is approximately 1.8-mile northwest of the investigated property.
- Aumillers Petroleum Equipment, located at 908 Egret Street, is approximately 1.8-mile northwest of the investigated property.

Due to the distance from the investigated site, it is not anticipated that this site would cause any environmental impacts to the investigated tract.

4.1.12 Solid Waste Landfill Sites

The LDEQ maintains records that typically contain an inventory of solid waste disposal facilities or landfills within the state. The EDR report did identify one solid waste landfill sites within the 1.5-mile search radius of the investigated site.

- Agrilectric Power Partners LTD, located at 3063 Highway 397, is approximately 1.3-mile south of the investigated property.

Due to the distance from the investigated site, it is not anticipated that this site would cause any environmental impacts to the investigated tract.

4.1.13 Leaking Underground Storage Tank Sites

The LDEQ maintains a database of sites with active and remediated leaking underground storage tanks (LUST). The EDR report did not identify any LUST sites within the 1.5-mile search radius of the investigated site.

4.1.14 Registered Underground Storage Tanks

The LDEQ maintains a database of registered UST's. The EDR report identified twelve

UST locations within the 1.25-mile search radius of the investigated site. The sites are listed as:

- Chardells Auto & Truck Plaza, located at 560 Highway 397, is approximately 0.56-mile northeast of the investigated property. Refer to section 4.5 for additional information pertaining to this site.
- Enterprise Transportation Company, located at 56625 East Broad Street, is approximately 0.62-mile northwest of the investigated property. Refer to section 4.5 for additional information pertaining to this site.
- Carrol's Grocery & Station, located at 5437 East Broad Street, is approximately 0.68-mile northwest of the investigated property.
- La Machinery Company, Inc., located at 5415 East Broad Street, is approximately 0.70-mile northwest of the investigated property.
- Gulf Machine Shop, Inc., located at 5337 East Broad Street, is approximately 0.78-mile northwest of the investigated property.
- Cady's Service Station, located at 6600 Highway 90, is approximately 0.84-mile north of the investigated property.
- Groendyke Transport, Inc located at 6273 Highway 90, is approximately 0.88-mile northwest of the investigated property.
- All Bonds by Lovett, located at 4935 East Broad Street, is approximately 1.2-mile northwest of the investigated property.
- Neff Rental Services, Inc., located at 5117 East Highway 90, is approximately 1.2-mile northwest of the investigated property.
- James Duplichan & Charles Reeves, located at 6208 Leslie Lane, is approximately 1.0-mile northeast of the investigated property.
- Former Oilfield Production Yard, located at 4931 East Broad Street, is approximately 1.2-mile northwest of the investigated property.

Due to the distance from the investigated site, it is not anticipated that these sites would cause any environmental impacts to the investigated tract.

4.1.15 Indian Underground Storage Tank Sites

The EPA maintains a database of UST and LUST sites located on Indian Land. The EDR

report did identify one Indian UST or LUST sites within the specified search radii of the investigated site.

- Lake Charles NRG, LLC located at 6309 Leslie Lane, is approximately 1.0-mile northeast of the investigated property.

Due to the distance from the investigated site, it is not anticipated that this site would cause any environmental impacts to the investigated tract.

4.1.16 Voluntary Remediation Program Sites

The Voluntary Remediation Program (VCP) is a program that provides current property owners with the opportunity to clean up contaminated properties and attain a release of liability for further clean up of historical contamination at the site. The EDR report did not identify any VCP sites within the 1.5-mile search radius of the investigated site.

4.1.17 Unmapped Sites

The EDR report identified 42 unmapped sites. The list of unmapped sites was reviewed and locations verified with respect to the investigated tract. None of the listed sites were observed in the immediate vicinity of the investigated tract. A complete listing of all unmapped sites is included in the attached EDR report.

4.2 ADDITIONAL ENVIRONMENTAL RECORD SOURCES

The EDR report presents additional databases other than the standard ASTM required information. A description of these databases and details of the search area for the databases are listed in the EDR report. The EDR report did identify 12 sites within the specified search radii of the investigated property under the supplemental categories. These listed sites are classified as a RCRA Non-Generator of Hazardous Waste. These sites are listed in the EDR as:

- Shuff Auto Service located at 5608 Broad Street, is approximately 0.62-mile northwest of the investigated property.
- Steve D. Thompson Trucking located at 5428 East Broad, is approximately 0.68-mile northwest of the investigated property.
- Rogers Enterprises located at 5350 East Broad, is approximately 0.75-mile northwest of the investigated property. Refer to section 4.5 for additional information pertaining to this site.
- Environmental Trucking Company located at 6331 Highway 90, is approximately 0.87-mile northwest of the investigated property.

- BJ Service Tools Lake Charles located at 6140 Highway 90, is approximately 0.92-mile northwest of the investigated property.
- Classic Chrome, Inc. located at 6004 Highway 90, is approximately 0.98-mile northwest of the investigated property.
- OVAC, Inc. located at 6208 Leslie Lane, is approximately 1.0-mile northeast of the investigated property.
- Aldan Corporation located at 6314 Leslie Lane, is approximately 1.0-mile northeast of the investigated property.
- Oil Marketers located at 5509 Highway 90, is approximately 1.2-miles northwest of the investigated property.
- Waste Management of Lake Charles located at 4935 East Broad Street, is approximately 1.2-miles northwest of the investigated property.
- L & L Environmental Services and L & L Oil located at 5117 Highway 90, is approximately 1.2 miles northwest of the investigated property.

Due to the distance between these sites and the investigated tract, it is not anticipated that these sites would cause any environmental impacts to the investigated tract.

4.3 PHYSICAL SETTING SOURCE

A United States Geological Survey (USGS) 7.5-minute Topographical Map was reviewed as part of this Phase I ESA. The USGS 7.5-minute Topographical Map is included as Figure 1 in Appendix A.

4.4 HISTORICAL USE INFORMATION ON THE PROPERTY AND ADJOINING PROPERTIES

4.4.1 Aerial Photograph Review

Historical aerial photographs from flights flown in 1964, 1973, 1983, 1989, 1998, 2004, and 2008 were reviewed as part of this Phase I ESA. The aerial photographs are included as Appendix C.

In the 1964, 1973, and 1983 aerial photographs, the majority of the investigated property appears to be undeveloped. Some development is visible on the northeast corner of the property. Railroad tracks are visible leading from the development to the west, then south along the western property boundary. The properties to the east of the investigated tract appear to be used for agricultural purposes. North of the investigated tract is a mixture commercial and residential properties.

In the 1989 aerial photograph, the investigated property appears to be vacant. A pit is visible on the northern portion of the property. The properties to the east of the investigated tract appear to be used for agricultural purposes. The current Tennessee Pipeline property is seen at the east boundary in this area. North of the investigated tract is a mixture commercial and residential property. South of the investigated tract is a mixture of vacant land and commercial property. The Calcasieu Parish Department of Corrections and CIAA are seen west of the investigated tract.

In the 1998 and 2004 aerial photograph, much of the investigated property appears to have been divided with levees, possibly for agriculture purposes. The pit seen in the previous photograph appears to be partially filled in these photographs. The northern portion of the investigated property is utilized as a home site. An industrial development (the current Spartech facility) is visible in the center of the property. A railroad spur is located along the western property boundary leading to the Spartech facility. A roadway is seen leading from Spartech to the industrial facility. North of the investigated tract is a mixture commercial and residential property. South of the investigated tract is a mixture of vacant land and commercial property. Properties west of the investigated tract appear as before.

In the 2008 aerial photograph, the much of the investigated property remains vacant. A mobile home appears to be located on the northeast corner of the property. The Spartech facility and a railroad spur leading to it are seen in this photograph. A mobile home park is visible on the east side of the property. North and east of the investigated tract is a mixture commercial and residential properties. South of the investigated tract is a mixture of vacant land and commercial property. Calcasieu Parish Department of Corrections and CIAA are visible west of the investigated tract.

4.4.2 City Directory Review

City Directories were reviewed at the Calcasieu Parish Library (Genealogy Division). City Directories were reviewed from 1960 to 2008 (the last available directory) for listings of the investigated property. The 1967 directory had the first listing for Swift Plant Road and Highway 397. From 1967 to 1980, there were several listings in the vicinity of the investigated tract; however, it was unclear if any of these listings were located on the property. These listings included residential home sites, mechanic shops, grain and feed stores, farming equipment sales and service, and oil field services. From 1980 to 2000 there were no listings on the investigated tract. From 2000 to 2008, a residential property was listed on the investigated site off of Swift Plant Road. James E. Suddeth Parkway, the road leading to the Spartech facility, was listed in the 2008 directory. The Spartech facility was the only listing on the parkway.

4.5 LDEQ RECORDS REVIEW

A review of the LDEQ Environmental Data Management System (EDMS) of the adjacent properties was also performed as part of this Phase I ESA. This review was performed to

determine any additional possible environmental concerns for the investigated property and the surrounding area. Several sites were listed on or adjacent to the investigated property. These sites are listed as:

- Spartech, located at 1101 James E. Suddeth Parkway, is located on the investigated property. Spartech is an industrial facility that combines various plastic and rubber compounds with different types of additives. The file review revealed that Spartech disposes of off-spec plastics at a permitted offsite disposal facility. Spartech also has a small source air permit. No evidence of past spills or releases was recorded in the reviewed files.
- Texas Eastern Transmission, LP – Lake Charles, located at 1284 Hwy 397, is located on the adjacent property to the east of the investigated tract. The EDMS files revealed that this site is a small quantity generator of hazardous waste. No violations were listed in the reviewed EDMS files. The reviewed files also indicated that there were two USTs removed from the property in October 1993. A 10,000 gallon gasoline and a 6,000 diesel tank were removed. Soil sampling revealed no petroleum hydrocarbons present on the site. LDEQ issued closure status for the tanks January 1994. Based on the reviewed files it is not anticipated that this site would cause any environmental impacts to the investigated tract.
- Chardells Auto & Truck Plaza, located at 560 Highway 397, is approximately 0.55-mile northeast of the investigated site. The EDMS files reviewed that there are currently five 8,000 gallon USTs located on the property. The files indicated that there are no leaks or concerns associated with the USTs. Based on the reviewed files it is not anticipated that this site would cause any environmental impacts to the investigated tract.
- Enterprise Transportation Company, located at 5625 East Broad Street, is located northeast of the investigated property. The EDMS files revealed that this site is a large quantity generator of hazardous waste. The last inspection performed by LDEQ personnel revealed no violations on the property. The EDMS files also indicated that one 12,000 gallon diesel tank was removed from the property in February 1999. Soil sampling revealed no petroleum hydrocarbons present on the site. Based on the reviewed files it is not anticipated that this site would cause any environmental impacts to the investigated tract.
- Calcasieu Parish Police Jury Department of Public Works, located at 5540 Swift Plant Road, is located on the adjacent property to the north and west of the investigated tract. The EDMS files revealed that the site is a small quantity generator of hazardous waste. No evidence of past spills or releases was recorded in the reviewed files. Based on the reviewed files it

is not anticipated that this site would cause any environmental impacts to the investigated tract.

- Rogers Enterprises, located at 5350 East Broad Street, is approximately 0.75-mile from the investigated property. Rogers Enterprises received crude oil bottoms and salvage oil from production and lease pits in the area. The site was operated from 1971 to 1985. The owner filed bankruptcy in 1985. The LDEQ conducted sampling of the site in 1986. Sample results revealed petroleum hydrocarbons located on the property above the allowable standards. The LDEQ contacted the EPA and the site was cleaned up under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The site was remediated from 1997 to 2000 in a joint effort by the EPA and LDEQ. The EDMS files reviewed indicated that the petroleum contamination was contained on the property and would not cause an environmental concern to the subject site. Based on the reviewed files it is not anticipated that this site would cause any environmental impacts to the investigated tract.

5.0 SITE RECONNAISSANCE

5.1 METHODOLOGY AND LIMITING SITE CONDITIONS

The investigated property was visually inspected by walking the tract. No limiting conditions were present which impeded the complete inspection of the tract.

5.2 SITE OBSERVATIONS

5.2.1 Exterior Observations

The investigated property consists of approximately 365 acres. The majority of the investigated property is vacant and utilized for the grazing of cattle. James E. Suddeth Parkway travels north and south through the center of the investigated property. The northeast section of the property was the former location of the Swift Meat Packing plant. Some remains of the Swift Meat Packing plant (cattle loading/unloading structures) are still visible at this location. These structures consist of concrete steps and platforms, metal fences, and concrete walls. Concrete tiles are visible throughout the grounds of the former meat packing plant area. Five drums of motor oil are located on this section of the investigated property. These drums were in poor condition and approximately ½ full. One drum of herbicide was located east of the oil drums. Labels on this drum indicated that it contained a compound call Brash and that it is classified as a hazardous waste by the EPA. This drum was in good condition and approximately ½ full. In addition to these drums, there were also several empty drums located on this section of the property. No leaks or holes were noted on the drums. No soil staining was observed around any of the drums. A mobile home is located on the northeast corner of the investigated property. At the time of the investigation, the mobile home was unoccupied.

On the east side of the investigated property was on-going construction at the former FEMA mobile home site. All mobile homes have been removed from this section of property and dirt work was being performed to restore the property to the original elevation. Construction equipment such as bulldozers, tractors, and dump trucks were located on the property. One roll-off box was located on this section of property. The construction company was using this roll-off box for the storage of trash and woodwaste. A temporary diesel fuel tank was located at the construction site. The tank was owned by Pumpelly Oil Company. The tank had a metal secondary containment structure and there were no leaks observed during the time of the inspection.

On the west side of the investigated property was the location of a former pit that has been filled. The elevation of this location was higher than the surrounding property. It is unknown if this pit was used for the removal of dirt or used as a landfill of some kind. There are no records with the CPPJ of City of Lake Charles concerning the operation or permitting of this pit. A large amount of concrete and rock is piled on the west side of the property. On the western property boundary is a railroad track that services the Spartech facility.

Located in the center of the investigated property is the Spartech facility. This industrial facility combines additives and pigments to raw plastic and rubber compounds. The facility is contained in a six foot high chain-link fence. The facility consists of office area, warehouse, two processing areas, truck and railcar loading/unloading areas, storage tanks, maintenance shop, maintenance and parts sheds, and a quality control lab. The railcar loading and unloading area is located on the south side of the facility. The contents of the railcars are unloaded and stored in six large cylindrical tanks located on the south side of the facility. Primarily resin compounds are stored in these tanks. No leaks or spills were noted around the tanks at the time of the inspection. Two small sheds are located on the west side of the facility. These sheds are utilized for the storage of parts and maintenance items such as tools, solvents, and spare pumps and motors. Some soil staining was noted around the maintenance shed. The stain was small in size and appeared to be oil from a motor or pump. The truck loading and unloading area is located on the north side of the facility. The raw plastic and rubber material is unloaded at this location and stored in the warehouse. Employee parking areas are located on the east side of the facility. No additional spills or soil staining was noted around the outside of the facility.

Two pipelines were observed on the investigated property. Gulf South has a natural gas pipeline running east/west through the northern portion of the property. The right-of-way is maintained through periodical mowing. No signs of releases or spills were noted on the right-of-way. Shell has a pipeline running east/west through the southern portion of property. There was no visible right-of-way or markings for this pipeline.

Photographs taken during the site inspection are included in Appendix D.

5.2.2 Interior Observations

The interior of the Spartech facility was inspected as part of this Phase I ESA. The office area consisted of a large room with several cubicles, offices, and a conference room. Miscellaneous office furniture such as desks, tables, and filing cabinets were located in this area.

The warehouse is a large metal structure with concrete floors. The warehouse contained the raw plastic and rubber compounds. The plastic and rubber compounds were stored and stacked in cardboard boxes and cardboard drums. No spills or staining was noted in the warehouse at the time of the inspection. The maintenance shop is located on the south side of the warehouse. Tools in the maintenance shop consisted of wrenches, a compressor, drill press, etc. No stains were noted on the shop floor at the time of the inspection.

The two processing areas are located on each side of the warehouse. The process area to the east of the warehouse is used to process the rubber compounds. The process area to the west of the warehouse is used to process the plastic compounds. Both process areas were metal structures with concrete floors. In the process areas was equipment such as conveyor lines, hoppers, extruders, and mixers. This equipment is used to mix the plastic and rubber compounds with various types of resins, additives, and pigments. Small amounts of resins, plastics, rubber, and oil were noted on the floor of both process areas.

The quality control lab is located south of the office area. The lab is used to test the finished products before they are shipped from the facility. Equipment used to process samples of plastic and rubber was located in the lab. No spills or stains were noted on the floor of the lab.

The interior to the parts and maintenance sheds were not inspected. The plant manager stated that the sheds are utilized for the storage of parts and maintenance items such as tools, solvents, and spare pumps and motors.

Photographs taken during the site inspection are included in Appendix D.

5.3 HAZARDOUS SUBSTANCES

Five drums of oil were located on the northeast section of the property. The drums appeared to be in bad condition and all were approximately ½ full. No leaks were noted on the drums. No soil staining was observed around the drums. One drum of Brash herbicide was located on the northeast section of the property. Labels on this drum indicated that it is classified as a hazardous waste by the EPA. This drum was in good condition and approximate ½ full. No leaks were observed around this drum. In addition, hazardous substances are used at the Spartech facility. No evidence was discovered that there has been a release of these substances to the property.

5.4 INDICATORS OF POLYCHLORINATED BIPHENYLS (PCBs)

Transformers are located along Broad Street and Highway 397. All of the transformers observed appeared to be in good condition, and no leaks were observed. Entergy Gulf States, Inc. has been contacted in the past with respect to its transformers. Entergy has stated in previous correspondence that their transformers are operated in compliance with all Federal and State regulatory guidelines, including those promulgated by the US EPA in Part 761 of Title 40, Toxic Substance Control Act. In case of a spill from a transformer on any site, Entergy will take the appropriate action.

Several large transformers are located at the Spartech facility. The transformers were in condition and enclosed in a fenced area. No leaks were observed around the transformers.

5.5 SOLID WASTE DISPOSAL

No indications of waste disposal currently being conducted on the property were observed. There was a large amount of broken concrete and rock located on the western section of the investigated property near the location of a former pit. It could not be confirmed whether this pit was used for solid waste disposal purposes. Several drums were located on the northeast section of the property. There were five drums of oil, one drum of herbicide, and four empty drums which the contents were unknown.

5.6 STORAGE TANKS

Six storage tanks were located at the Spartech facility. These tanks are utilized for the storage of resin powder that is used in the process at the facility. These tanks were in good shape with no visible leaks observed. One diesel storage tank was located at the construction site at the former FEMA mobile home site. The tank was owned by Pumpelly Oil Company. The tank was in good condition and contained in a secondary containment structure. No leaks were observed during the time of the inspection.

Located on the adjacent property to the west of the investigated site is the Calcasieu Parish Police Jury Department of Public Works facility. At this facility there are three aboveground gasoline and diesel tanks. These tanks are contained in a concrete secondary containment structure. There is also a large aboveground water storage tank located on the property.

6.0 INTERVIEWS

6.1 INTERVIEWS WITH OWNERS

Ms. Linda Manuel, of the Lake Charles Harbor and Terminal District was interviewed as part of this Phase I ESA. Ms. Manuel stated that the port owned the property for approximately 20 years. Ms. Manuel stated that there was a pit located on the property; however she was unaware what the pit was utilized for. She stated that the engineering department of the port believed the location to be a borrow pit. Ms. Manuel stated to the

best of his knowledge there are no environmental issues associated with the investigated property.

Interview questionnaires for each interview performed as part of this Phase I ESA is included in Appendix E.

6.2 INTERVIEW WITH SITE MANAGER

Refer to Section 6.1 for interview with Site Manager.

6.3 INTERVIEWS WITH OCCUPANTS

Mr. Richard Leonards is a current tenant of the investigated property. Mr. Leonards grazes cattle on the majority of the investigated property. Mr. Leonards stated that the northeast corner of the property was utilized as the Swift Meat Packing Plant. Mr. Leonards stated to the best of his knowledge there are no environmental issues associated with the investigated property.

Mr. Anand Chowbey, plant manager for Spartech, was interviewed as part of this environmental assessment. Mr. Chowbey stated that the Spartech facility has been located on the investigated property for approximately 15 years. He stated that to his knowledge there have been no spills or release at the facility. Mr. Chowbey stated that the facility has a small source air permit and disposes of off-spec plastics at a permitted offsite disposal facility. Mr. Chowbey also stated that majority of the off-spec plastics is now being recycled at another facility.

Interview questionnaires for each interview performed as part of this Phase I ESA is included in Appendix E.

6.4 INTERVIEWS WITH LOCAL GOVERNMENT OFFICIALS

Mr. Scott Wilkerson with the Southwest Regional Office of the LDEQ was interviewed regarding environmental issues pertaining to the tract. Mr. Wilkerson stated that he was not aware of any unauthorized discharges, outstanding violations, or enforcement actions associated with the investigated or adjacent properties.

Interview questionnaires for each interview performed as part of this Phase I ESA is included in Appendix E.

6.5 INTERVIEWS WITH OTHERS

Brian Keller with Shell Pipeline Division was interviewed regarding the pipeline on the investigated property. Mr. Keller stated that the six-inch crude oil line was abandoned in the late 1980's. Mr. Keller was unaware if the pipeline still remained on the investigated property. He stated that most of the pipeline has been removed from underground;

however some of the pipeline still remains. Mr. Keller stated that to his knowledge, no releases have occurred on the investigated property.

Several attempts to contact Gulf South regarding the pipeline on the investigated property were unsuccessful.

7.0 ADDITIONAL SERVICES

No additional services were provided as part of this Phase I ESA.

8.0 FINDINGS

Based on the results of the activities performed during this Phase I ESA, two recognized environmental conditions were identified with the investigated tract.

Five drums of motor oil are located on the northeast section of the property. These drums are in poor condition and are approximately ½ full. One drum of herbicide was located on this section of property as well. Labels on this drum indicated that it contained a compound call Brash and that it is classified as a hazardous waste by the EPA. No leaks or staining was observed around any of the drums.

Spartech is an operating industrial facility located on the investigated property. Spartech takes raw plastic and rubber compounds and mixes resins, additives, and pigments to the compounds. Since this site is in operation, there is the threat of a release from this facility. Plastic or rubber compounds with different additives could be spilled on the property in the event of a malfunction or problem with the operating systems. Also, hydraulic oil from the process or oil from pumps and motors could be released on to the investigated property.

Two other noteworthy items were identified during the course of this investigation. There was former pit identified on the property, west of James E. Suddeth Parkway. The pit was likely used for soil borrow purposes and has been filled as confirmed by visual inspection of the tract. A review of local municipal records revealed no evidence of a permit being issued for the pit. The purpose of the pit could not be confirmed nor could the materials used to fill the pit. Investigation activities out the scope of this Phase I ESA would need to be performed to further evaluate the use and current condition of the filled pit.

Also, there are two pipelines located on the property. One pipeline is a natural gas pipeline owned by Gulf South. The right-of-way was maintained through periodical mowing. No signs of releases or spills were noted on the right-of-way. The other pipeline is an abandoned six-inch crude oil line owned by Shell. Conversations with Shell personnel indicated that most of this pipeline has been excavated; however, some of the pipeline still remains underground. It is unclear that the pipeline is still on the investigated property.

9.0 OPINIONS

There are two recognized environmental conditions identified with this tract. .

Five drums of motor oil are located on the northeast section of the property. These drums are in poor condition and are approximately ½ full. No leaks or staining was observed on the drums at the time of the inspection. One drum of herbicide was located near the oil drums. Labels on this drum indicated that it contained a compound call Brash and that it is classified as a hazardous waste by the EPA. This drum was in good condition with no leaks observed. It is recommended that these drums be removed from the property and property disposed of offsite.

Spartech is an operating industrial facility located on the investigated property. Spartech takes raw plastic and rubber compounds and mixes resins, additives, and pigments to the compounds. Since this site is in operation, there is the threat of a release from this facility. Plastic or rubber compounds with different additives could be spilled on the property in the event of a malfunction or problem with the operating systems. Also, hydraulic oil or oil from pumps and motors could be released on to the investigated property.

10.0 CONCLUSIONS

Arabie Environmental has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527 of the investigated tract described in the legal description provided in Appendix A, the property. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report. This assessment has revealed evidence of two recognized environmental conditions in connection with the property.

- Five drums of motor oil are located on the northeast section of the property. These drums are in poor condition and are approximately ½ full. No leaks or staining was observed on the drums at the time of the inspection. One drum of herbicide was located near the oil drums. Labels on this drum indicated that it contained a compound call Brash and that it is classified as a hazardous waste by the EPA. This drum was in good condition with no leaks observed. It is recommended that these drums be removed from the property and properly disposed of offsite.
- Spartech is an operating industrial facility located on the investigated property. Spartech takes raw plastic and rubber compounds and mixes resins, additives, and pigments to the compounds. Since this site is in operation, there is the threat of a release from this facility. Plastic or rubber compounds with different additives could be spilled on the property in the event of a malfunction or problem with the operating systems. Also, hydraulic oil or oil from pumps and motors could be released on to the investigated property. The existence of hazardous substances at the facility results in the fact that there is the material threat of a release of these substances to the property. However, visual inspection and regulatory file review indicated no evidence of a release.

Two noteworthy items were identified during the course of this investigation. The first was former pit identified on the property, west of James E. Suddeth Parkway. The pit was likely used for soil borrow purposes and has been filled as confirmed by visual inspection of the tract. A review of local municipal records revealed no evidence of a permit being issued for the pit. The purpose of the pit could not be confirmed nor could the materials used to fill the pit. Investigation activities out the scope of this Phase I ESA would need to be performed to further evaluate the past use and current condition of the filled pit.

The second item is two pipelines located on the property. One pipeline is a natural gas pipeline owned by Gulf South. The right-of-way was maintained through periodical mowing. No signs of releases or spills were noted on the right-of-way. The other pipeline is an abandoned six-inch crude oil line owned by Shell. Conversations with Shell personnel indicated that most of this pipeline has been excavated; however, some of the pipeline still remains underground. It is unclear whether any portion of the pipeline is still buried on the investigated property.

11.0 DEVIATIONS

No deviations from ASTM Practice E 1527 were made during the investigation.

12.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

Arabie Environmental has extensive experience in environmental investigations and in Phase I and II Environmental Site Assessments. Since 1989, Arabie Environmental has completed numerous assessments. Many of these assessments have been performed for repeat clients and have involved diverse properties including private, commercial, light industrial and heavy industrial properties. These properties have ranged in size from hundreds of acres and many buildings, to small lots containing no buildings.

12.1 QUALIFICATIONS AND CREDENTIALS OF ARABIE ENVIRONMENTAL PERSONNEL

Resumes of Arabie Environmental personnel who participated in this investigation are included as Appendix F. The Environmental Professional's Statement is included in Appendix G.

13.0 REFERENCES

- ASTM International, 2005.11, E 1527-05, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", Pgs. 1-35. ASTM International, West Conshohocken, PA.
- Delorme Software, 1999, 3-D TopoQuads. USGS 7.5-Minute Topographical Map, Lake Charles Quadrangle.

- Environmental Data Resources, 2009, EDR Radius Map Report, Inquiry Number 2844454.1s, prepared for Arabie Environmental Solutions, Inc., Lake Charles, Louisiana.
- Historical Aerial Photography obtained from Louisiana Department of Transportation, Baton Rouge, Louisiana.
- Infrared Aerial Photography obtained from <http://atlas.lsu.edu>, from Louisiana State University, Baton Rouge, Louisiana.
- Lake Charles City Directories, Calcasieu Parish, Louisiana (1950 – 2008), Calcasieu Parish Library.