

Exhibit CC. Acadiana Regional Airport P4 Site Phase I Environmental Site Assessment





Acadiana Regional Airport P4 Site Phase I Environmental Site Assessment



Acadiana Regional Airport Site Iberia Parish, Louisiana

Prepared for: One Acadiana 807 East Saint Mary Boulevard Lafayette, Louisiana 70503

August 12, 2019

Prepared in General Accordance with ASTM Standard E 1527-13

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1.0 SUMMARY

Conditions in conjunction with the property and surrounding properties are identified within the environmental site assessment. These conditions are then addressed to determine whether they are suspected recognized environmental conditions (RECs) or fully meet the definition of a REC (see **Footnote 1**).

"We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527 of Acadiana Regional Airport Site, Iberia Parish, Louisiana, the property. Any exceptions to, or deletions from, this practice are described in Section 9.0 of this report. This assessment has revealed no evidence of RECs in connection with the property other than the following:

A fuel fill station was historically located adjoining the northwest portion of the subject property. This site was further researched in the Louisiana Department of Environmental Quality (LDEQ) Electronic Data Management System (EDMS) which identified remediation and soil sampling activities. EDMS indicated that Mr. John Koury of Kourco Environmental Services (KES) was involved with recent soil sampling and LDEQ correspondence at this site. Mr. Koury was contacted and indicated that a Phase II Environmental Site Assessment was conducted at this area which identified several constituents above current non-industrial LDEQ Risk Evaluation/Corrective Action Program (RECAP) limits, however beneath industrial limits. Mr. Koury also indicated that as a result a conveyance was filed on the property restricting use to industrial which was also identified in the LDEQ EDMS. The LDEQ issued a No Further Interest (NFI) letter for this site dated June 14, 2018. This finding therefore presents a **CREC** (controlled recognized environmental condition)."

Significant Data Gaps

The following is a list of significant data gaps that were identified during the course of the environmental site assessment:

All previous occupants and owners of the subject property were not identified in the report to determine all historical uses of the subject property.

(Please also see Section 9.0 for a complete discussion on significant data gaps identified during the course of the environmental site assessment.)

Footnote 1: As defined in ASTM Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process Designation E 1527-13, *RECs* 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 *recognized environmental conditions*. De minimis means 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. A *material threat* is a physically observable or *obvious* threat which is reasonably likely to lead to a *release* that, in the opinion of the *environmental professional*, is threatening and might result in impact to public health or the environment. *Obvious* threats are that which is plain or evident; a condition or fact that could not be ignored or overlooked by a reasonable observer while visually or physically observing the *property*.

2.0 INTRODUCTION

2.1 Purpose

As indicated by the User, the purpose of this Phase I ESA is to identify, to the extent feasible pursuant to ASTM standard E 1527-13, RECs in connection with the property. This report is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (hereinafter, the "landowner liability protections," or "LLPs"): that is, the practice that constitutes "all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. §9601(35)(B). This report is also intended to give the User a better understanding of environmental conditions associated with the subject property.

2.2 Detailed Scope of Services

H & H Environmental, Inc. was asked by Mr. Zach Hager (One Acadiana) to conduct a Phase I ESA for that property described in Section 3.1 of this report. A formal agreement was executed between the parties and is located in Appendix 14.7.

2.3 Significant Assumptions

No significant assumptions were made for this report.

2.4 Limitations and Exceptions

Detailed deviations or exceptions including data gaps are discussed in Section 9.0 of this report. Limitations encountered during the site reconnaissance are specifically discussed in Section 6.1 of this report. Please note that the All Appropriate Inquiry Rule requires a search for recorded environmental cleanup liens. As per agreement with the User of this report, a title search and environmental lien search were not conducted for this assessment. Any information discovered during these searches by the User was not provided to the Environmental Professional.

2.5 Special Terms and Conditions

No special contractual terms or conditions were established for this report.

2.6 User Reliance

This assessment was performed for the User using methods and procedures consistent with ASTM E 1527-13. The independent conclusions stated in this report represent the best professional judgment of the Environmental Professional based on the conditions that existed and the data available during the course of the assessment. Factual information provided by the User, Owner, Occupants, and agencies has been assumed to be correct and complete. This report may be distributed and relied upon by the User and their assigns.

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The property is located approximately 0.17 miles north of the intersection of Highway 3212 and Tiger Drive in Iberia Parish, Louisiana and has a latitude of approximately 30° 01' 35.6" and a longitude of approximately 91° 52' 01.5". The legal description was not provided by the User, however, a site map is located in Appendix 14.2.

3.2 Site and Vicinity General Characteristics

The site is a vacant plot of land. Further, it is surrounded by other plots of land all either vacant or used for transportation, commercial, or agricultural activities with improvements located upon them such as buildings and structures.

3.3 Current Use of the Property

The property is currently used to support agricultural activities.

3.4 Descriptions of Structures, Roads, Other Improvements on the Site (including heating/cooling system, sewage disposal, source of potable water)

The subject property currently has no developments.

3.5 Current Use of the Adjoining Properties

Direction	Use
North	Airport to the northwest and agriculture and commercial to the north
East	Commercial gas station to the northeast and roadway then commercial to the east
South	Agriculture
West	Roadway and agriculture

4.0 USER PROVIDED INFORMATION

4.1 Title Records

Recorded land title records reviewed for environmental liens or activity use limitations were not provided by the User.

4.2 Environmental Liens or Activity and Use Limitations

No environmental liens or use limitations, such as engineering controls, land use restrictions or institutional controls, against the property that are filed or recorded under federal, tribal, state, or local law were reported by the User. Please note that the All Appropriate Inquiry Rule requires a search for recorded environmental cleanup liens. The User did not indicate that this search was to be conducted by the environmental professional. Also, no information related to the recorded environmental cleanup lien search was provided to the environmental professional other than indicated in the User Questionnaire provided in Appendix 14.6.

4.3 Specialized Knowledge

The User reported no specialized knowledge or experience that is material to RECs in connection with the property or nearby properties.

4.4 Commonly Known or Reasonably Ascertainable Information

The User reported no awareness of any commonly known or reasonably ascertainable information within the local community about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases.

4.5 Valuation Reduction for Environmental Issues

No Property valuation reduction related to environmental issues or concerns was reported by the User and the purchase price of the property reflects fair market value.

Classification	Name & Contact Information
Owner	Iberia Parish Police Jury
	Mike Tarantino (337) 367-0834
(representative)	mtarantino@iberiabiz.org
	One Acadiana
	807 E St. Mary Blvd.
User	Lafayette, LA 70503
	Zach Hager-Director, Business Development
	Office: (337) 408-3669/Cell: (337) 849-4997
Voy Site Monogon	Mike Tarantino (337) 367-0834
Key Site Manager	mtarantino@iberiabiz.org
Occupant	Not Applicable

4.6 Owner, User, Manager, and Occupant Information

5.0 **RECORDS REVIEW**

The purpose of the records review is to obtain and review records that will help identify RECs in connection with the property.

5.1 Standard Environmental Record Sources

Documentation of the standard environmental record search is contained in Appendix 14.5. The record search found the following environmental sources within the approximate minimum search distance. The sources were reviewed to determine if a recognized environmental condition, historical recognized environmental condition, controlled recognized environmental condition, or a de minimis condition exists at the property in connection with the listing. Please note that sites which are identified during the standard environmental record source research are listed on various databases and it is possible that the address listed is for the corporate office only and may not be the actual site of concern.

List:	ECHOR06/FRSLA/ICISNPDES		
Site Name:	Spanish Lake Wetland Assimilation Project	Distance:	N/A
Address:	On Tower Drive	Direction:	N/A
City, State:	New Iberia, LA 70563	Elevation:	20 feet
Comments:			
A NPDES water discharge permit was identified for the subject property. There was no evidence discovered that			

A NPDES water discharge permit was identified for the subject property. There was no evidence discovered that indicated that any hazardous substance or petroleum product was spilled, leaked, or improperly disposed on the subject property in relation to this permit or use therefore this is not considered a REC.

List:	FUDS		
Site Name:	Naval Air Station N.I.	Distance:	0.004 miles
Address:	N/A	Direction:	NE
City, State:	New Iberia, LA	Elevation:	19 feet
Commenter			

Comments:

This site was identified as a Formerly Used Defense Site (used by the DOD as a jet training facility). Please see below discussion for Acadiana Regional Airport.

List:	CPI/FRSLA/HLUST/SEMSARCH/UST		
Site Name:	Acadiana Regional Airport Distance: 0.01 miles		
Address:	510 Ave C Ste A/1213 Ember Drive/ Building 88A	Direction:	North
City, State:	New Iberia, Louisiana 70560	Elevation:	19 feet

Comments:

Numerous underground storage tanks were identified at this location. Further investigation in the Louisiana LDEQ EDMS indicated that a tank farm for fuel was located historically approximately 0.12 miles southwest of the subject property when the property was occupied by the Department of Defense. Remediation activities existed at this location which were reviewed by the LDEQ. The location is a lower elevation than the property, therefore it is highly unlikely that surface drainage could have transported contamination from this location to the property. The exact groundwater flows at the property cannot be determined without further investigation, however, due to the distance of the tank farm from the subject property and the knowledge that historically, the majority of underground storage tank leaks rarely have contamination migrate more than 0.1 miles if the contamination reaches initial groundwater levels, it is highly unlikely that contamination from this site could have reached the subject property through soil and groundwater or vapor migration, therefore this is not considered a REC.

A fueling island was historically located adjoining the northwest portion of the subject property. This site was further researched in the LDEQ EDMS which identified remediation and soil sampling activities. Mr. John Koury of KES was involved with recent soil sampling and LDEQ correspondence at this site. Mr. Koury was contacted and indicated that a Phase II Environmental Site Assessment was conducted at this area which identified several constituents above current non-industrial LDEQ Risk Evaluation/Corrective Action Program (RECAP) limits, however beneath industrial limits. Mr. Koury also indicated that as a result a conveyance was filed on the property restricting use to industrial which was also identified in the LDEQ EDMS. The LDEQ also issued a No Further Interest (NFI) letter for this site dated June 14, 2018. This finding therefore presents a CREC (controlled recognized environmental condition).

A pipeline was identified in the LDEQ EDMS which connected the tank farm and the fueling island. The Owner provided historical correspondence between Mr. John Koury and the airport which indicated that there were three 6" metal fuel lines buried approximately 2'-3' deep connecting the fueling island and the tank farm. Mr. Koury observed concrete in the end of the line at the fueling island and believed that the line was completely filled with cement and was terminated approximately at the grade of the parking lot in the center of the island. Mr. Koury further indicated that the other two fuel lines continued towards the center fueling island, where one of the lines turned towards the surface and was terminated approximately at the grade of the parking lot in the center of the island. Mr. Koury believed that it was also completely filled with cement as he observed concrete in the end of the line within the island. The third line continued towards the last island, which is nearest Ember Drive. It turned towards the surface and was terminated approximately at the grade of the parking lot in the center of the island. Mr. Koury believed that it was also completely filled with cement as he observed concrete in the end of the line within the island. Based on the findings of Kourco's exploratory efforts, Mr. Koury believed that the former product lines were inert. In addition, he indicated that none of the soils that were excavated during this process had any hydrocarbon odors. Mr. Koury was also contacted to further discuss these findings and he further noted that the 6" lines were thick walled steel and appeared to be welded rather than connected with threaded couplings therefore presenting less chance for a leak or release. Due to these findings, it is highly unlikely that there were any leaks or spills from the connecting 6" piping from the tank farm to the fueling island, therefore this is not considered a REC.

List:	NLRUST/UST		
Site Name:	Chevron Service Station/Fuel Up Sugarena	Distance:	0.01 miles
Address:	2911 W Admiral Doyle Dr.	Direction:	NE
City, State:	New Iberia, LA 70560	Elevation:	19 feet

Comments:

Please note that the underground storage tanks which exist at this site are approximately 0.1 miles northeast of the subject property. The location is at a lower elevation than the property, therefore it is highly unlikely that surface drainage could have transported possible contamination from this location to the property. Also, this site is separated from the subject property by a coulee. The exact groundwater flows at the property cannot be determined without further investigation, however, due to the distance of the site from the subject property and the knowledge that historically, the majority of underground storage tank leaks rarely have contamination migrate more than 0.1 miles if the contamination reaches initial groundwater levels, it is highly unlikely that possible contamination from this site could have reached the subject property through soil and groundwater or vapor migration, therefore this is not considered a REC.

List:	RCRAGR06		
Site Name:	Tetra Technology	Distance:	0.07 miles
Address:	3019 W Admiral Doyle Drive	Direction:	North
City, State:	New Iberia, LA 70560	Elevation:	19 feet
Commonter			

Comments:

No evidence was discovered through the records research, interviews, or visual inspection to indicate that any petroleum products or hazardous waste was ever spilled, leaked, or improperly disposed of at this location and adversely impacted the property, therefore this is not considered a REC.

5.2 Additional Environmental Record Sources

To enhance and supplement the standard environmental record sources, local records and/or additional federal, state, or tribal records shall be checked when, in the judgment of the environmental professional, such additional records (1) are reasonably ascertainable, (2) are sufficiently useful, accurate, and complete in light of the objective of the records review, and (3) are generally obtained, pursuant to local good commercial and customary practice, in initial environmental site assessments in the type of commercial real estate transaction involved. To the extent additional sources are used to supplement the Standard Environmental Record Sources, approximate minimum search distances should not be less than those specified in ASTM 1527-13. Documentation of additional environmental record sources is contained in Appendix 14.5. Any sites identified during the additional records search are addressed in Section 5.1.

5.3 Physical Setting Source(s)

A current USGS 7.5-Minute Topographic Map (or equivalent) showing the area on which the property is located shall be reviewed.

Source	Description / Identification	
Current USGS 7.5 Minute Topographic Map	USGS quadrangle map (equivalent) entitled "New Iberia North, La." provided by	
	GeoSearch	
USGS and/or State Geological Survey-	Not obtained for this report	
Groundwater Map	Not obtained for this report	
USGS and/or State Geological Survey-	Louisiana Geological Survey (LGS) Geologic	
Surficial Geologic Maps	Map of Louisiana (LA)	

Source	Description / Identification
Soil Conservation Service Soil Maps	Not obtained for this report
Other Physical Setting Sources	Louisiana Department of Natural Resources (LDNR) SONRIS online database for water,
	oil, and natural gas wells.

The following table summarizes the conclusions reached after review of the above referenced physical setting sources.

Quadrangle contour interval	5 feet
Property elevation	20 feet
Property slope direction (including storm water flows)	The property appears to be generally level and storm water flows onto the adjacent properties, roadway drainage ditches, or dissecting coulees.
General topography of surrounding area	Generally level
Geologic, hydrogeologic, and hydrologic description	According to the LGS Geologic Map of Louisiana, the property is located on Quaternary-aged Prairie Terraces (Map Symbol Qtp), which consists, in general, of light gray to light brown clay, sandy clay, silt, sand and some gravel. This particular area is also characterized by surficial deposits of loess, which is described, in general, as tan to reddish brown massive silt with some clay and minor amounts of very fine sand. The loess can vary from 1 to 9 meters in thickness.
Bedrock geography	Not ascertainable from sources reviewed
Flood zone	Not ascertainable from sources reviewed

5.4 Historical Use Information on the Property

The objective of consulting historical sources is to develop a history of the previous uses of the property and surrounding area, in order to help identify the likelihood of past uses having led to RECs in connection with the property.

	Development					
Year	Subject Property	North	South	East	West	How ascertained
2015 2013	Agriculture and wooded on the east	Agriculture and structures	Agriculture and roadways	Roadway then structures	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch
2010 2009	Agriculture and wooded on the east and north	Agriculture and structures	Agriculture and roadways	Roadway then structures	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch
2007 2006 2005 2004	Agriculture and wooded on the east and north	Agriculture and structures	Wooded and roadways	Roadway then structures	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch
1998	Agriculture and wooded on the east and north	Agriculture and wooded with structures on the northwest	Wooded and roadways	Roadway then agriculture	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch
1989	Agriculture and wooded with apparent activity on the northwest	Wooded and structures on northwest	Wooded and roadways	Roadway then agriculture and wooded	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch

Year	Subject Property	North	South	East	West	How ascertained
1983	Vacant with dissecting coulee on the east and in the center of the property with apparent metal roofed structure along the southeastern property boundary	Vacant and structures	Roadways and vacant	Roadways and vacant	Structure along the northwest property boundary, roadways and vacant	Topographic mapping viewed on the USGS online database
1981	Agriculture, wooded, vacant, with apparent structure on the northwest	Wooded and structures on northwest	Wooded and roadways	Roadway then agriculture and wooded	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch
1976	Agriculture, wooded, vacant, with apparent structure on the northwest and southeast	Wooded and structures on northwest	Wooded and roadways	Roadway then agriculture and wooded	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch

	Development					
Year	Subject Property	North	South	East	West	How ascertained
1968	Agriculture, wooded, vacant, with apparent structure on the northwest	Wooded and structures on northwest	Wooded and roadways	Roadway then agriculture and wooded	Roadway then agriculture with structure on northwest	Aerial Photograph provided by GeoSearch
1956 1952 1951	Agriculture and structures on north	Agriculture	Agriculture and roadways	Roadway then structures and agriculture	Roadway then structures and agriculture	Aerial Photograph provided by GeoSearch
1940	Agriculture and structures on north	Agriculture and structures on northeast	Agriculture and roadways	Roadway then structures and agriculture	Roadway then structures and agriculture	Aerial Photograph provided by GeoSearch

5.5 Historical Use Information on Adjoining Properties

Uses in the area surrounding the property shall be identified in the report, but this task is required only to the extent that this information is revealed in the course of researching the property itself. Please see Section 5.4.

6.0 SITE RECONNAISSANCE

A site visit was performed by Mr. Ben Harmon, Environmental Professional (H & H Environmental, Inc.) on Friday, July 19, 2019. The observations noted in this Section apply to the property and surrounding property as they appeared on that day. The objective of the site reconnaissance is to obtain information indicating the likelihood of identifying RECs in connection with the property.

6.1 Methodology and Limiting Conditions

The site boundary was traversed via automobile by the environmental professional in such a fashion that all exterior surface areas were visible to the eye. The following limitations were encountered during the site visit: 1) areas covered by grass or undergrowth preventing the visual inspection of the soil could not be observed, 2) areas covered by agricultural crop could not be inspected, 3) then northern property boundary could not be observed as during the site inspection it began to rain and there was no apparent field roadway which could be traversed via automobile to complete the inspection, and 4) the eastern portion of the subject property along the coulee could not be visually observed as it was heavily vegetated.

6.2 General Site Setting

(1) Current Use(s) of the Property

Requirement:

Identify current use of property (more specific information is more helpful then less detailed data). Current uses likely to involve the use, treatment, storage, disposal, or generation of hazardous substances or petroleum products shall be identified. Unoccupied occupant spaces should be noted.

Commentary:

The property is currently used as agricultural. Agricultural use typically involves the use, treatment, storage, disposal, or generation of hazardous substances or petroleum products. Opinions and conclusions on findings are discussed in Section 1.0 and Section 8.0.

(2) Past Use(s) of the Property

Requirement:

Identify past use of property to the extent that indications of past uses are visually and/or physically observed or are identified in the interviews or record review. Describe if they are likely to have involved the use, treatment, storage, disposal, or generation of hazardous substances or petroleum products.

Commentary:

The property appears to have been used as agricultural in the past. Agricultural use typically involves the use, treatment, storage, disposal, or generation of hazardous substances or petroleum products. Past uses of the property identified in the interviews, historical research, or records review are listed in Section 5.4, Section 7.0, Appendix 14.4, and Appendix 14.6. Opinions and conclusions on findings are discussed in Section 1.0 and Section 8.0.

(3) Current Use(s) of Adjoining Properties Requirement:

Identify current use to the extent that current uses are visually and/or physically observed or are identified in the interviews or records review. Describe if they are likely to indicate RECs in connection with the adjoining properties or the property.

Commentary:

North: Airport to the northwest and agriculture and commercial to the north - suspect RECs indicated

East: Commercial (gas station) to the northeast and roadway then commercial to the east - suspect RECs indicated

South: Agriculture - suspect RECs indicated

West: Roadway and agriculture - suspect RECs indicated

Current uses of the property identified in the interviews, historical research, or records review are listed in Section 5.4, Section 7.0, Appendix 14.4, and Appendix 14.6. Opinions and conclusions on findings are discussed in Section 1.0 and Section 8.0.

(4) Past Use(s) of Adjoining Properties

Requirement:

Identify use to the extent that past uses are visually and/or physically observed or are identified in the interviews or records review. Describe if they are likely to indicate RECs in connection with the adjoining properties or the property.

Commentary:

No visual evidence was apparent to indicate past uses of adjoining properties. Past uses of the adjoining properties identified in the interviews, historical research, or records review are listed in Section 5.4, Section 7.0, Appendix 14.4, and Appendix 14.6. Opinions and conclusions on findings are discussed in Section 1.0 and Section 8.0.

(5) Current or Past Use(s) in the Surrounding Area

Requirement:

Identify use to the extent that such uses are visually and/or physically observed, or going to or from the property for the site visit, or are identified in the interviews or records review. Describe if they are likely to indicate RECs in connection with the adjoining properties or the property.

Commentary:

Roadways, commercial businesses, and agricultural properties are located in the surrounding area and are not likely to indicate RECs in connection with the adjoining properties or the property. Past uses of the property identified in the interviews, historical research, or records review are listed in Section 5.4, Section 7.0, Appendix 14.4, and Appendix 14.6. Opinions and conclusions on findings are discussed in Section 1.0 and Section 8.0.

(6) Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

Requirement:

Note topographic conditions of the property and surrounding area to the extent visually and/or physically observed or determined from interviews as well as the general topography of the area surrounding the property that is visually and/or physically observed from the periphery of the property. If any information obtained shows there are likely to be hazardous substances or petroleum products on the property or on nearby properties and those hazardous substances or petroleum products are of a type that migrate, topographic observations shall be analyzed in connection with geologic, hydrogeologic, hydrologic, and topographic information obtained pursuant to records review and interviews to evaluate whether hazardous substances or

petroleum products are likely to migrate to the property, or within or from the property, into groundwater or soil.

Commentary:

The subject property slopes generally to the adjacent properties, roadway ditches, or coulees on the subject property. Any migration of substances onto the subject property would likely occur via the groundwater, ditches, or coulees. No visual evidence was discovered which might indicate a concern of such migration. Determining groundwater flow direction which would require further investigation.

(7) General Description of Structures

Requirement:

Generally describe the structures or other improvements on the property, for example: number of buildings, number of stories each, approximate age of buildings, ancillary structures (if any), etc.

Commentary:

There are currently no structures on the subject property.

(8) Roads

Requirement:

Public thoroughfares adjoining the property shall be identified and any roads, streets, and parking facilities on the property shall be described.

Commentary:

The subject property is bordered to the southeast by Highway 3212 and to the west by Tiger/Ember Drive.

(9) Potable Water Supply

Requirement:

The source of potable water for the property shall be identified.

Commentary:

Not applicable.

(10) Sewage Disposal System

Requirement:

The sewage disposal system for the property shall be identified. Inquiry shall be made as to the age of the system as part of the interview process.

Commentary:

Not applicable.

6.3 Exterior Observations

Observation	Commentary				
Roads/paths on	No roads or paths were observed which were likely to have been used				
property with no	as an avenue for disposal of hazardous substances or petroleum				
outlet	products				
Hazardous substances					
and petroleum					
products identified					
(Chemical/product,	No hazardous substances or petroleum products were identified				
approx. quantities,					
container types,					
storage conditions)					
Unidentified					
substance containers					
(Approximate	No unidentified substance containers were identified				
quantities, container	No unidentified substance containers were identified				
types, storage					
conditions)					
Above ground storage	No above ground storage tanks were identified				
tanks	No above ground storage tanks were identified				
Underground storage	No underground storage tanks or vent pipes, fill pipes, or access ways				
tanks	indicating UST's were observed. Several active apparent natural gas or				
(Including	petroleum pipelines were identified on or adjoining the subject				
underground process					
piping)	property.				
Odors	Strong, pungent, or noxious odors were not identified				
Pools of liquids	No standing surface water was identified				
Sumps	No sumps containing liquids likely to be hazardous substances or				
Sumps	petroleum products were identified				
Drums	No drums were identified				
	No electrical or hydraulic equipment was identified which might				
PCB equipment	contain PCB's other than nearby electrical transformers on and				
	adjoining the subject property				
Pits, ponds, lagoons	No pits, ponds, or lagoons were identified other than coulees on and				
	adjoining the subject property.				
Stained soil/pavement	No stained soil or pavement was identified				
Stressed vegetation	No stressed vegetation was identified				
Solid waste	No solid waste disposal areas were identified				
	No wastewater or liquid flows (excluding storm water) were identified				
Wastewater	which might flow into a drain, ditch, underground injection system, or				
	stream on or adjacent to the property.				
Wella	No dry wells, irrigation wells, injection wells, abandoned wells, or				
Wells					
	other wells were identified				

	~
Observation	Commentary
Hazardous substances	
and petroleum	
products identified	
(Chemical/product,	
approx. quantities,	
container types,	
storage conditions)	
Unidentified substance	
containers	
(Approximate	
quantities, container	
types, storage	
conditions)	
Above ground storage	
tanks	
Underground storage	
tanks	
(Including	
underground process	
piping)	
Odors	
Pools of liquids	
Sumps	
Drums	
PCB equipment	
Heating / cooling	
(Incl. fuel source)	
Stains or corrosion	
Drains	

6.4 Interior Observations - Not Applicable

7.0 INTERVIEWS

The objective of interviews is to obtain information indicating RECs in connection with the property. Appendix 14.6 contains a complete summary and documentation of the interview process.

7.1 Interview with Owner

The property owner (representative), Mr. Michael Tarantino, was asked about the existence of environmental related documents and no documents were identified as existing. The property owner was also asked a series of question regarding the current and past use of the subject property and no affirmative responses were received during the interview other than the following:

• Property usage: Agriculture

The interview did reveal evidence of a known or suspect REC (see Section 8.0 for more information on designation of REC's).

7.2 Interview with Site Manager

The Key Site Manager is the same as the Owner.

7.3 Interviews with Occupants

The subject property is currently not occupied.

7.4 Interviews with Local Government Officials

Brett Doumit with the Iberia Parish Fire District #1 was interviewed and no affirmative answers were received during the interview concerning registered transformers with PCB's, hazardous substance or petroleum products releases, or an incident on the subject property involving mobilization of the fire department. The interview did not reveal evidence of a known or suspect REC.

7.5 Interviews with Others

The User Questionnaire, as supplied in Appendix X3 of ASTM 1527-13, was provided to the User and a copy is located in Appendix 14.6. A summary of the findings are located in Section 4.0.

8.0 EVALUATION

8.1 FINDINGS & OPINIONS

The report shall have a findings section which identifies known or suspect RECs, controlled RECs, historical RECs, and de minimis conditions. The report shall include the environmental professional's opinion(s) of the impact on the property of known or suspect environmental conditions identified in the findings section. The logic and reasoning used by the environmental professional in evaluating information collected during the course of the investigation related to known or suspect environmental conditions shall be discussed. The opinion shall specifically include the environmental professional's rationale for concluding that a known or suspect environmental conditions identified by the environmental professional as RECs currently shall be listed in the conclusions section of the report. Please note that all findings and opinions on findings concerning the governmental records review are located in Section 5.0. Any RECs identified in Section 5.0 are summarized in Section 1.0.

Finding	Opinion on Impact and Classification as REC
	Pesticides and herbicides are typically used for agricultural purposes. There was no evidence, whether visual or by interviews or research, which was discovered throughout the course of the environmental site assessment to indicate that any of these products was used on the property in amounts other than required through the course of normal agricultural practices which generally would 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, therefore this is considered a de minimis condition and not a REC.
Coulees were identified on and adjoining the subject property.	No visual evidence was discovered during the site assessment to indicate that any hazardous substances or petroleum products were ever spilled, leaked, or improperly disposed in the coulees therefore this is not considered a REC.
or petroleum pipelines were	No visual evidence was discovered during the site assessment to indicate that any petroleum products were ever spilled or leaked from these pipelines therefore this is not considered a REC.
	The transformers appeared to be in good condition and relatively new. Also an interview with the local fire department indicated that to the best of their knowledge, there were no transformers within the immediate area which contained PCBs, therefore this is not considered a REC.

8.2 CONCLUSIONS

The report shall include a conclusions section that summarizes all RECs connected with the property and the impact of these RECs on the property. Please see Section 1.0.

9.0 LIMITING CONDITIONS/DEVIATIONS

Deletions and Deviations

Deviations from ASTM Practice E 1527-13 were necessary as discussed below.

Data Gaps/Data Failures

If a data failure is encountered, the report shall document the failure and, if any of the standard historical sources were excluded, give the reasons for their exclusion. If the data failure represents a significant data gap, the report shall identify and comment on significant data gaps that affect the ability of the environmental professional to identify RECs and identify the sources of information that were consulted to address the data gaps.

8.3.2 Uses of the Property - All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier.

8.3.2.1 Intervals - Review of standard historical sources at less than approximately five year intervals is not required ... If the specific use of the property appears unchanged over a period longer than five years then it is not required by this practice to research the use during that period

The above requirements were deviated from. The records listed in this section were searched in an effort to determine all obvious uses of the property back to the property's obvious first developed use, or back to 1940, whichever is earlier. Since the term "developed use" includes agricultural uses, it is necessary to determine when the property was undeveloped.

<u>Aerial Photographs</u> Aerial photographs were provided by GeoSearch.

Fire Insurance Maps

Sanborn maps were not searched as the subject property is not part of a historical town which would normally have map coverage.

Property Tax Files

Property tax files were not searched as tax files rarely provide additional historical information beyond what interviews, aerial photography, and topographic mapping provide.

Recorded Land Title Records

Please note that the All Appropriate Inquiry Rule does not require that any specific type of historic information be collected, in particular a chain of title document for the property. The rule allows for the environmental professional to use professional judgment when determining what types of historical documentation may provide the most useful information about a property's ownership, uses, and potential environmental conditions when seeking to comply with the objectives and performance factors for the inquiries. As per agreement with the User of this report, a title search and environmental lien search were not conducted for this assessment. Any information discovered during these searches by the User was not provided to the Environmental Professional.

USGS 7.5 minute topograhic maps

Topographic mapping was viewed on the USGS website.

Local Street Directories

Local street directories were not searched as the subject property address was not provided.

Building Department Records

Building department records were not searched as the subject property address was not provided and no recent structures on the site were identified through other historical sources which would have likely been listed in readily accessible building department records.

Zoning/Land Use Records

Zoning records were not searched for the subject property as they rarely provide additional historical information beyond what interviews, aerial photography, and topographic mapping provide.

Please see Section 5.4 for a complete list of all information discovered during the historical record search.

Based on the above attempts, determining all obvious uses of the property back to the property's obvious first developed use, or back to 1940, whichever is earlier and at 5 year intervals was not deemed "reasonably ascertainable" for the purposes of this report, subject to the constraints of "data failure" as listed above.

Data Gaps Other Than Historical

The report shall identify and comment on significant data gaps that affect the ability of the Environmental Professional to identify RECs and identify the sources of information that were consulted to address the data gaps. A data gap is only significant if other information and/or professional experience raises reasonable concerns involving the data gap.

The following is a list of data gaps, other than historical, which were identified during the course of the environmental site assessment:

All previous occupants and owners of the subject property were not identified in the report to determine all historical uses of the subject property.

10.0 ADDITIONAL SERVICES

The Louisiana Department of Natural Resources (LDNR) SONRIS database was searched for any water wells, oil wells, natural gas wells, or well pits on the subject property and none were identified. Please see Appendix 14.4 for LDNR SONRIS database supporting documentation.

11.0 REFERENCES

ASTM E 1527-13, Standard Practice for Environmental Site Assessments

Radius Report and Aerial Photographs provided by GeoSearch

USGS Topographic Mapping obtained from http://store.usgs.gov.

LDNR SONRIS database: http://www.dnr.state.la.us

Louisiana Geological Survey, 1984, Geologic Map of Louisiana

Louisiana Department of Environmental Quality Electronic Data Management System

12.0 SIGNATURE(S) OF ENVIRONMENTAL PROFESSIONAL(S)

The environmental professional(s) responsible for the Phase I Environmental Site Assessment shall sign the report.

Ben Harmon

Ben Harmon (H & H Environmental, Inc.), Environmental Professional

<u>August 12, 2019</u> Date

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

13.0 QUALIFICATION(S) OF ENVIRONMENTAL PROFESSIONAL(S)

Ben Harmon – H & H Environmental, Inc.

EDUCATION

- Associate of Science Louisiana State University (Eunice, LA) 1993
- Bachelor of Science McNeese State University (Lake Charles, LA) 1995 Major - Environmental Science Minor - Chemistry

EXPERIENCE

- Environmental reports concerning compliance with water quality regulations, air quality regulations, and solid waste regulations.
- Obtained water discharge permits in accordance with environmental laws
- Prepared pollution prevention plans
- Prepared spill contingency plans
- Assessed site compliance with existing environmental regulations
- Prepared emergency response plans
- Prepared risk management plans
- Prepared storm water pollution prevention plans
- Prepared best management practices
- Prepared Environmental Site Assessments for purposes of innocent land owner defense
- Experience in the oil & gas exploration and production industry regarding environmental permitting and compliance matters
- Experience in the petrochemical industry regarding environmental permitting
- Provided consultation regarding environmental compliance
- Ten years relevant experience as defined in Paragraph 312.10 of 40 CFR 312

The above experience and knowledge demonstrates that the above named Environmental Professional is qualified to conduct and prepare a Phase I ESA.

14.0 APPENDICES

- 14.1 Site (Vicinity) Map
- 14.2 Site Plan
- 14.3 Site Photographs
- 14.4 Historical Research Documentation (aerial photographs, fire insurance maps, historical topographical maps, etc.)
- 14.5 Regulatory Records Documentation
- **14.6** Interview Documentation
- 14.7 Special Contractual Conditions between User and Environmental Professional
- **14.8** Qualifications of the Environmental Professional(s)
- 14.9 Industry Standard Definitions for Reference as defined in ASTM E 1527-13
- 14.10 List of Acronyms

Appendix 14.1 - Site (Vicinity) Map

USGS 7.5 minute Quadrangle (Please see Appendix 14.5) Appendix 14.2 - Site Plan

