

**Exhibit BB. Parks Geismar Site Phase I Environmental  
Site Assessment**

**BATON ROUGE AREA CHAMBER  
BATON ROUGE, LOUISIANA**

**PHASE I ENVIRONMENTAL  
SITE ASSESSMENT**

**PARKS/GEISMAR PROPERTY  
LA HIGHWAY 75  
GEISMAR, LOUISIANA 70734**

**JANUARY 2015**

**CK Associates' Project No. 11810**

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SITE ASSESSMENT**

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LA HIGHWAY 75  
GEISMAR, LOUISIANA 70734**

Prepared for:

**Baton Rouge Area Chamber  
Baton Rouge, Louisiana**

**JANUARY 2015**

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## EXECUTIVE SUMMARY

CK Associates, LLC (CK) has completed a Phase I Environmental Site Assessment (ESA) for the Parks/Geismar property located on LA Highway 75 in Geismar, Ascension Parish, Louisiana. The property consists of approximately 183.5 acres east of LA Highway 75 and south of LA Highway 3251 (Ashland Road). For the purpose of this ESA, “the property” refers to the 183.5 acres and all improvements therein.

In order to characterize environmental conditions for the project, CK:

- Reviewed federal, state, and local environmental databases;
- Conducted historical research;
- Interviewed pertinent personnel; and
- Performed a site investigation.

CK performed this Phase I ESA in accordance with the scope and limitations of the American Society for Testing and Material (ASTM) Practice E 1527-13 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* of the Parks/Geismar property located on LA Highway 75 in Geismar, Ascension Parish, Louisiana. Any exceptions to, or deletions from, this practice are described in the report. Based on the review of federal, state, and local environmental databases, historical research, interviews, and site investigations, this assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the property.

### 1.0 INTRODUCTION

#### 1.1 Purpose

The purpose of the assessment is to identify any potential RECs located on or in the vicinity of the property, that have, or may have in the past, adversely impacted environmental conditions at the property.

#### 1.2 Scope of Services

CK is responsible for investigating the property in order to identify RECs within and adjacent to the property. Investigation procedures comply with ASTM E 1527-13 and the scope of services for this ESA includes the following:

- Research of available federal, state, and local environmental databases for potential REC sites on, or within a specified distance of, the property;

- Reviews of historical aerial photographs, Sanborn® Fire Insurance Maps, United States Geologic Survey (USGS) topographic maps, and/or published soils and geologic information;
- Interviews with state and local government agency representatives and/or persons knowledgeable of the property regarding documented inspections, violations, incidents, spill response, or past uses of therein;
- Visual observations of accessible portions of the property to identify current and historical REC sites. Visual observations of accessible portions of properties adjacent to the property were also conducted; and
- Preparation of a written report that identifies whether the property contains potential RECs and whether or not conditions warrant further investigation.

In accordance with the procedures outlined in ASTM E 1527-13, a Phase I ESA typically does not include sampling and analysis of soil and/or groundwater. Additionally, a Phase I ESA typically does not include wetland delineations or surveys for cultural or historic resources, threatened or endangered species, lead based paint, or asbestos containing materials. Additionally, the User, the Baton Rouge Area Chamber (BRAC) did not require a chain-of-title review to be included in this assessment.

### **1.3 Significant Assumptions**

No significant assumptions were made in the preparation of this Phase I ESA.

### **1.4 Limitations and Exceptions**

CK's review of records information and environmental databases included information that was reasonably ascertainable from standard sources. *Reasonably ascertainable* denotes (1) information that is publicly available, (2) information that is obtainable within reasonable time and cost constraints, and (3) information that is practically reviewable. CK's review included information gathered directly from governmental and regulatory agencies as well as an electronic database search performed by Environmental Database Resources, Inc. (EDR). References used in the preparation of this document are included in **Appendix A**. Much of this information was gathered from public records and sources maintained by third parties. Although reasonable care was taken to verify this information, CK does not accept responsibility for errors, omissions or inaccurate information.

CK interviewed available individuals identified as having current and historical knowledge of land use, commercial and residential development, and activities

and incidents associated with the property. *Available individuals* include (1) persons with whom contact can be made within reasonable time constraints, and (2) persons willing to share information with interviewers. These individuals were selected based on their employment in state and local government, association with, or proximity to, specific properties, or long-time residence in and knowledge of the area. Significant effort was made to identify and contact individuals possessing direct knowledge of sites; however, no guarantee is made or intended that all individuals with pertinent knowledge of sites were identified and interviewed. Additionally, CK makes no guarantee that information provided during the interviews is free of errors, omissions, or inaccurate information.

Observations made during CK's reconnaissance of the property were limited to (1) sites or portions of sites that were accessible to investigators, and (2) evidence that was visible to the investigators. Observations were based on evidence that was visible to inspectors while walking and driving the property. No ground excavation, vegetation clearing, or physical relocation of obstacles was conducted during site investigations. Accordingly, no guarantee is made or intended that all property conditions were observed.

### **1.5 Special Terms and Conditions**

No significant special terms or conditions with respect to ASTM E 1527-13 standards were made.

### **1.6 User Reliance**

In accordance with ASTM E 1527-13 Section 7.5.2.1, *Reliance*, CK is not required to verify independently the information provided by various sources but may rely on the information unless there is actual knowledge that certain information is incorrect or unless it is obvious that certain information is incorrect based on other information obtained during the course of the investigation or otherwise actually known to the investigators conducting the assessment. However, CK has no indications that the information provided by outside sources is incorrect.

## **2.0 SITE DESCRIPTION**

### **2.1 Location and Legal Description**

The Ascension Parish Assessor's Office records indicate that the property is a portion of parcel number 2034000 owned by Southwood Terminal, LLC. The property is centered at approximately 30° 10' 27.28" N, -90° 59' 17.87".

The legal description of the parcel from the Ascension Parish Assessor's Office is:

237.67 ACRES BELLE HELENE PLAN. SECS. 18, 19, 20, 21, 22 & 23-10-2 (LOTS 7-A-1, 40, 41-B, 42, 43-A-1 & 43-A-2) (290/540-330-538-331) (602/446) (622/131) (MAP #443448) (MAP #727332) (MAP #738498) (MAP #813314)

## **2.2 Site Vicinity and General Characteristics**

The property lies east of LA Highway 75 and south of LA Highway 3251 (Ashland Road) in Geismar, Louisiana on the east bank of the Mississippi River. Chemical plants are present north and east of the property. Pasture and timber are present to the south and west of the property. The mean elevation of the property is approximately 18 feet above mean sea level (MSL) and varies from approximately 25 feet above MSL on the western side of the property to 15 feet above MSL on the eastern side of the property. The site is generally flat with a slope of approximately 0.003 feet/foot.

## **2.3 Current Use of Property**

The property is currently vacant. The southwestern portion of the property has been used as a dirt bike track. The eastern portion of the property is wooded and occasionally hunted by the property owners.

## **2.4 Description of Structures, Roads, and Other Improvements on Site**

There are no improvements on the property. Dirt roads accessible by all-terrain vehicles (ATV) are present throughout the property.

## **2.5 Current Uses of Adjoining Properties**

North: wooded land, followed by LA Highway 3251.  
East: wooded and pasture land, followed by the Univar facility.  
South: wooded and pasture land.  
West: LA Highway 75, flowed by the Mississippi River and levee.

## **3.0 USER PROVIDED INFORMATION**

This section describes the information provided by the User, as defined in ASTM E 1527-13.

### **3.1 Title Records**

As detailed in ASTM E 1527-13 Section 6.2, *Review Title and Judicial Records for Environmental Liens or Activity and Use Limitations (AULs)*, land title records

should be reviewed in order to determine if environmental liens or activity and use limitations have been recorded against the property. In accordance with the agreement between CK and the User, title records were not reviewed as a part of this assessment.

### **3.2 Environmental Liens or Activity and Use Limitations**

CK reviewed state and federal records research provided by EDR of CERCLIS (Superfund) liens, federal land use controls, state sites with controls, and local liens; none were located within ASTM-recommended search distances of the property. The EDR Report is presented in **Appendix B**.

### **3.3 Specialized Knowledge**

The User provided a Geotechnical Engineering Report conducted in October 2012 and a Phase I ESA conducted in May 2013 for Avalon Rare Metals on the northern portion of the property.

### **3.4 Commonly Known or Reasonably Ascertainable Information**

No commonly known or reasonably ascertainable information regarding the environmental history of the property was conveyed to CK.

### **3.5 Valuation Reduction for Environmental Issues**

There is no indication of a valuation reduction due to environmental issues at the property.

### **3.6 Owner, Property Manager, and Occupant Information**

The property is Southwood Terminal LLC, represented by Mr. Lew Parks. An interview with Mr. Parks is summarized Section 6.0.

### **3.7 Reason for Performing Phase I ESA**

This Phase I ESA has been conducted to provide due diligence for property transfer and is intended to permit the 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.

## 4.0 RECORDS REVIEW

Historical sources, physical setting sources, and regulatory databases were reviewed to evaluate current and past land uses and assess environmental impacts that have occurred or may potentially occur in association with the property.

### 4.1 Standard Environmental Record Sources

In accordance with ASTM E 1527-13 Section 8.0, *Records Review*, CK conducted a thorough search of federal, state and local government environmental databases to obtain and review records and/or documents that would aid in the identification of known or potential RECs on or near the property. ASTM E 1527-13 contains a list of records that must be reviewed and the minimum search distance to use.

ASTM E 1527-13 Section 8.2.1, *Standard Federal, State, and Tribal Environmental Record Sources*, requires a review of the following databases and proscribes various search radii:

Federal NPL <sup>1</sup> Site List	1.0 mi
Federal <i>Delisted</i> NPL Site List	0.5 mi
Federal CERCLIS <sup>2</sup> List	0.5 mi
Federal CERCLIS-NFRAP <sup>3</sup> Site List	0.5 mi
Federal RCRA <sup>4</sup> CORRACTS <sup>5</sup> List	1.0 mi
Federal RCRA Non-CORRACTS TSD <sup>6</sup> Site List	0.5 mi
Federal RCRA LQG/SQG <sup>7</sup>	target/adjoining property
Federal IC/EC <sup>8</sup> Registries	target property
Federal ERNS <sup>9</sup> List	target property
State-Equivalent NPL List	1.0 mi
State-Equivalent CERCLIS List	0.5 mi
State Landfill and/or Solid Waste Disposal Site Lists	0.5 mi
State Leaking UST <sup>10</sup> Lists	0.5 mi
State-Registered UST Lists	target/adjoining property
State IC/EC Registries	target property
State VCP <sup>11</sup>	0.5 mi
State Brownfield Sites	0.5 mi

<sup>1</sup>National Priority List

<sup>2</sup>Comprehensive Environmental Response, Compensation, and Liability Information System

<sup>3</sup>CERCLIS-No Further Remedial Action Planned

<sup>4</sup>Resource Conservation and Recovery Act

<sup>5</sup>Corrective Action Report

<sup>6</sup>Treatment, Storage, and Disposal Facility

- <sup>7</sup>Large or Small Quantity Generator
- <sup>8</sup>Institutional Control/Engineering Control
- <sup>9</sup>Emergency Response Notification System
- <sup>10</sup>Underground Storage Tank
- <sup>11</sup>Voluntary Cleanup Program

Information generated by the database search conducted by EDR is contained in **Appendix B**. Additional information was obtained through searching the Louisiana Department of Environmental Quality's (LDEQ's) Electronic Document Management System (EDMS).

EDR research of the databases revealed 11 records associated with two plottable sites within the ASTM-recommended search radii. EDR noted seven orphan sites, or sites within the same zip code as the property but without sufficient location information to plot. CK's review of LDEQ records revealed none of the orphan sites to be located within one mile of the property.

The two plottable sites identified by EDR are:

Facility Name: Univar USA/Geismar Facility/Houston  
Facility Location: 34200 Distribution Lane, Geismar, LA 70734  
Facility ID: 529  
Database: CERCLIS-NFRAP, RCRA LQG, State Equivalent NPL, Remediation  
Distance/Direction: 0.10 mi west

Facility Name: Old Inger Oil Refinery  
Facility Location: Hwy 75 4½ mi N of Town, Darrow, LA 70725  
Facility ID: 4714  
Database: Delisted NPL, Federal EC, State Equivalent NPL, State EC, Remediation  
Distance/Direction: 0.106 mi south-southwest

Both sites are further discussed in Section 7.0.

#### 4.2 Additional Environmental Record Sources

ASTM E 1527-13 Section 8.2.3, *Additional Federal, State, Tribal, and Local Environmental Record Sources*, states that one or more additional state or local sources may be checked to enhance and supplement the federal and state sources identified in ASTM E 1527-13 Section 8.2.1. EDR's records search included a review of several additional federal, state, and local databases; these are included in **Appendix B**.

CK reviewed LDEQ's EDMS files for the each of the orphan sites reported by EDR in an attempt to determine their locations. CK also reviewed EDMS for any files for the property including files under Avalon and Southwood Terminal, as well as for other facilities observed in the vicinity of the property. This information is presented in Section 7.0.

Water well records obtained by EDR from federal and state agencies were reviewed. The well information and a well location map in relation to the property are included in **Appendix B** with the EDR Report. EDR reported 206 registered wells within a one-mile radius of the property. These include 85 plugged wells, 62 monitoring wells and piezometers primarily associated with Shell Chemical and Vulcan Chemical, 16 USGS wells, six public supply wells, three domestic wells, seven industrial supply wells, 23 recovery wells associated with Vulcan Chemical, three rig supply wells, and one destroyed well. A review of the Louisiana Department of Natural Resources (LDNR) SONRIS database indicates that nine wells are located on the property: three are plugged and six are monitoring wells associated with Shell Chemical.

A review of LDNR's oil and gas well locations revealed 36 listings within one mile of the property. LDNR's SONRIS database depicts three wells located on the property: two are plugged and abandoned dry holes, and one is a plugged and abandoned gas condensate producer. The oil and gas information and a location map in relation to the property are included in **Appendix B** with the EDR Report.

CK reviewed the National Pipeline Mapping System for information on pipelines in the vicinity of the property. A Cypress Gas Pipeline Company natural gas pipeline crosses the property from northwest to southeast. Two Enterprise pipelines run along the southern property boundary: one carries propane or polypropylene, the other carries butane.

#### **4.3 Physical Setting Sources**

In accordance with ASTM E 1527-13, a current USGS 7.5-Minute Topographic Map was utilized as the primary physical setting source (**Figure 1**). Soils at the property have been characterized by the USDA Soil Conservation Service as primarily Commerce and Sharkey series. Commerce soils are silty clay loams. These soils are somewhat poorly drained and are characterized by layers that impede downward flow of water, leading to poor infiltrations rates. Sharkey soils are also silty clay loams. Sharkey soils are clayey and poorly drained; they are often associated with a high water table.

#### **4.4 Historical Use Information on Property and Adjoining Properties**

##### **4.4.1 Local Street Directories**

EDR provided a historical tenant search of Cole Information Services for addresses located on LA Highway 75 and Ashland Road. Directories were reviewed back to 1992. Listings on LA 75 are primarily residential south of the property and commercial and industrial north of the property in all years reviewed. Listings on Ashland Road are primarily industrial. No listings appear to be on the subject property. Local Street Directory documentation is included in **Appendix C**.

##### **4.4.2 Sanborn® Fire Insurance Maps**

Founded in 1867, the Sanborn Fire Insurance Company produced Sanborn® Fire Insurance Maps that document the historical property use of over 12,000 American towns and cities. Known for their tremendous details of size, material composition and minute construction elements of buildings as well as property boundaries and street widths, Sanborn® maps provide a valuable tool for completing an ESA in that land use of a property can be monitored in depth over a long period of time. No Sanborn maps were available for the property. Documentation of the search is included in **Appendix D**.

##### **4.4.3 Historical Topographic Maps**

CK researched historical quadrangles for structures, mines, quarries, clearings, wells, and land use in order to (1) ascertain historical development of the project area, and (2) identify indications of possible REC sites. USGS historical topographic maps dating back to 1892 (**Appendix E**) were reviewed. The property is located within the Gonzales, Louisiana quadrangle on the 7.5-minute series maps and on the Donaldsonville, Louisiana quadrangle on the 15-minute series maps. Maps from 1892, 1935, 1953, 1961, 1962, 1965, 1980, 1991 and 1998 were reviewed.

1892. The 1892 15-minute series map identifies the property as upland located southwest of the Belle Helene community. A tributary to Bayou Conway is mapped in the vicinity of the property. The Mississippi River levee is visible west of the property.

1935. The 1935 7.5-minute series quadrangle maps the property as upland. A crescent shaped wetland is mapped on the property. An intermittent tributary to Bayou Conway flows east from the wetland area. No roads or structures are mapped on the property.

1939. The 1939 15-minute series quadrangle maps the property as upland containing the crescent shaped wetland and the intermittent tributary to Bayou Conway flowing east from the wetland area. The Mississippi River 1930 meander line is mapped from north to south within the property. No roads or structures are mapped on the property.

1953. The 1953 7.5-minute series quadrangle maps as upland containing vegetated areas. The previously observed wetland area is mapped as a depression on the 1953 map. No roads or structures are mapped on the property. LA Highway 1 and the Mississippi River levee are present west of the property.

1961 & 1962. The 1961 7.5-minute series map and the 1962 15-minute series map depict the property similar to the 1953 map. Two oil wells are mapped in the vicinity of the property. LA Highway 30 (previously labeled LA Highway 1) and the Mississippi River levee are present west of the property.

1965. The 1965 15-minute series map depicts the property similar to the 1962 map.

1980. The 1980 7.5-minute series quadrangle is photorevised from the 1961 map. No roads or structures appear to be present on the property. The two previously noted oil wells remain in the vicinity of the property. Portions of the property are mapped as orchards. Industrial facilities are present to the north of the property. LA Highway 75 (previously labeled LA Highway 30) and the Mississippi River levee are present west of the property.

1991. The 1991 7.5-minute series depicts the property as similar to 1980. No roads or structures appear to be present on the property. The two previously noted oil wells are no longer present. Portions of the property previously mapped as orchards are mapped as shrubland in 1991. Industrial facilities are present to the north of the property. Numerous oil and gas wells are mapped south of the property.

1998. The 1998 7.5-minute quadrangle depicts the property as similar to 1991. No roads or structures appear to be present on the property. Two ponds are mapped west of the property and east of LA Highway 75.

#### **4.4.4 Historical Aerial Photographs**

Historical aerial photographs for the years 1961, 1973, 1975, 1985, 1989, 1993, 1995, 2005, 2006, 2007 and 2005 were obtained from EDR and analyzed for information about the site history of the property. The historic aerial

photographs obtained from EDR are included in **Appendix F**. Findings are summarized below.

1961. The property appears to be agricultural in 1961. Treelines appear to separate fields on the majority of the property. A crescent-shaped wooded area is present on the west side of the property. Two oil well pads are visible, one east and one west of the property.

1973. The property appears similar to its 1961 appearance. The crescent-shaped area appears to hold water in 1973. The oil well pads remain visible.

1975. The property appears similar to its 1973 appearance.

1985. The majority of the property appears in similar condition to that seen in 1975. Two areas within the north-central portion of the property have been cleared of trees. A road leading east into the southwestern portion of the property is present; this may be an oil well road. Additional development associated with the oil well adjacent to the east side of the property is visible.

1989. The property is in similar condition to that seen in the 1985 photograph. The cleared areas noted on the 1985 photograph appear to be partially vegetated. Another cleared area is present at the northeast corner of the property. The road at the southwestern corner of the property does not appear to have been maintained; however, the area surrounding it is clear of trees. Additional development associated with the oil well adjacent to the east side of the property is visible. The well road on the west side of the road is no longer visible.

1993. The eastern portion of the property appears similar to that seen in the 1989 photograph. The southwestern portion of the property appears to have been partially cleared of trees. A pit southwest of the property and LA Highway 75 appears to be in the process of being filled in the 1993 photograph. The location is the site of the Old Inger Oil Refinery (see Section 7.0 for further information).

1995. The 1995 photographs depict the property in similar condition to the 1993 photographs.

2005. The property is noticeably more vegetated than previous photographs. The majority of the property is covered with trees, and the cleared areas are no longer visible, although the trees appear to be in rows. Two corridors (possibly pipelines) are visible in the southwest portion of the property, and two cleared areas are present on either side of the central portion of the crescent shaped

waterbody. The pit southwest of the property and LA Highway 75 appears to be completely filled.

2006. The majority of the property appears vegetated as seen on the 2005 photograph. A sinuous dirt road is visible in the southwestern portion of the property.

2007. The majority of the property appears vegetated as seen on the 2006 photograph. The sinuous dirt road in the southwestern portion of the property appears to be further developed.

2009. The 2009 photograph depicts the property in similar condition to that seen on the 2007 photograph.

2010. The 2010 photograph depicts the property in similar condition to that seen on the 2009 photograph.

#### **4.4.5 Radon**

Current Federal and State guidelines indicate that concentrations of radon at less than four picoCurries per liter (pCi/L) are non-threatening to human health, concentrations of radon between four and 20 pCi/L pose a risk of long term exposure, and concentrations of radon greater than 20 pCi/L pose an immediate threat to human health.

The EDR Radius Map (**Appendix B**) identifies Ascension Parish as a Zone 3 area with a predicted indoor average radon level of less than two pCi/L.

## **5.0 SITE RECONNAISSANCE**

In accordance with ASTM E 1527-13 Section 9.0, *Site Reconnaissance*, field investigations were conducted in order to inspect the property and surrounding areas for structures, oil and gas exploration and production, land use, runoff patterns, and indications of environmental impacts. The investigation was conducted December 29, 2014. Photographs from the investigation are presented in **Appendix G**.

### **5.1 Methodology and Limiting Conditions**

The property was investigated in order to identify RECs, current and historical, that have, or may have in the past, adversely impacted environmental conditions at the property. ASTM E 1527-13 Section 9.0, *Site Reconnaissance*, addresses aspects of site field investigations. CK, as described in this report, has investigated the property for RECs based on information gathered during historical research, the environmental database review, interviews with

pertinent personnel, and field reconnaissance in accordance with ASTM E 1527-13 standards, as applicable and appropriate.

Observations made during CK's reconnaissance of the property were limited to (1) portions of the site that were accessible to investigators, and (2) evidence that was visible to the investigators. Observations were based on evidence that was visible to inspectors while driving or walking the property. Due to the thick vegetation, the interior of the wooded area in the northern portion of the property was not accessible. No ground excavation or physical relocation of obstacles was conducted during inspections. Accordingly, no guarantee is made or intended that all property conditions were observed.

## **5.2 General Site Setting**

ASTM E 1527-13 Section 9.4.1, *General Site Setting*, addresses current and past use of the property being assessed, adjoining properties, and the surrounding area. The property lies east of LA Highway 75 and south of LA Highway 3251 (Ashland Road) in Geismar, Louisiana on the east bank of the Mississippi River. Chemical plants are present north and east of the property. Pasture and timber are present to the south and west of the property. The mean elevation of the property is approximately 18 feet above MSL.

## **5.3 Exterior Observations**

The interior of the property was accessed via all-terrain vehicle and on foot via established trails. The property is primarily wooded. Numerous drainage features were observed within the property, and a crescent-shaped pond is located on the western side of the property. The southwestern portion of the property was used as a motocross course, and an unmaintained sinuous dirt road is present in this area.

### **5.3.1 Pits, Ponds, or Lagoons**

A crescent-shaped pond is located on the western side of the property. Standing water from recent rain was noted in several areas on the property.

### **5.3.2 Stained Soil or Pavement**

No areas of stained soil, gravel, or pavement indicating the discharge of petroleum product or hazardous substances were observed on the property.

### **5.3.3 Stressed Vegetation**

No stressed vegetation was observed on the property.

#### **5.3.4 Solid Waste**

Remnants of wooden and metal deer stands and other hunting equipment were noted on the property.

#### **5.3.5 Wells**

No wells were observed on the property. CK navigated to the listed coordinates of the monitoring wells reported to be on the property; no monitoring wells were observed at the listed locations.

#### **5.3.6 Septic Systems**

No septic systems were observed on the property.

#### **5.3.7 Oil and Gas Drilling Activities**

There is no visible evidence of current or past oil or gas drilling activities on the property.

#### **5.3.8 Storage Tanks**

No storage tanks were observed on the property.

#### **5.3.9 Odors**

No strong, pungent, or noxious odors were detected on the exterior of the property or adjacent properties during the site reconnaissance.

#### **5.3.10 Pools of Liquid**

No pools of liquid other than rainwater puddles were observed on the property.

#### **5.3.11 Drums and Containers**

No drums or containers were observed on the property.

#### **5.3.12 Unidentified Substance Containers**

No unidentified containers were observed.

#### **5.3.13 Polychlorinated Biphenyls (PCBs)**

No PCB-containing equipment was observed on the property.

#### **5.4 Interior Observations**

There are no interior spaces on the property.

### **6.0 INTERVIEWS**

CK spoke with Mr. Lew Parks, the property owner, on December 16, 2014. Mr. Parks has owned the property for approximately 23 years. Mr. Parks answered the owner questionnaire (**Appendix G**) via telephone. He was not aware of any environmental concerns on the property. He stated that previous ESAs and/or risk assessments had been completed at the property, possibly under the name Avalon, and agreed to provide those documents for review. Mr. Parks indicated that the southwest corner of the property had been used as a dirt bike track, and that other portions of the property are used for timber and hunting. CK spoke with Mr. Parks again on January 5, 2015, to request any information regarding the monitoring wells that plot on the property, and the former oil wells that plot on the property. Mr. Parks had no knowledge of monitoring wells on the property, and indicated that his father, Mr. Fred Parks, has been associated with the property and may know the history. Mr. Parks thought that all oil wells were adjacent to the property. He confirmed that the Univar facility is located east of the property, and that there is a buffer between the property and the Univar facility. He indicated that he was unaware of any incidents at the Univar facility that may have affected the property.

CK spoke with Mr. Fred Parks, who works at the facility adjacent to the property and is the owner's father with historical knowledge of the property, during the site reconnaissance on December 29, 2014. Mr. Parks indicated that he was not aware of any monitoring wells on the property. Mr. Parks stated that no facility was ever present at the location plotted by EDR as Univar on Distribution Lane on the north side of the property.

CK corresponded with Mr. Kevin Poche, who works in Shell-Geismar's environmental division, via email on January 6, 2015. Mr. Poche indicated that Shell-Geismar does not have any off-site monitoring wells.

## 7.0 EVALUATION

### 7.1 Findings

As defined in ASTM E 1527-13 Section 1.1.1, REC means:

“...the presence or likely presence of any *hazardous substances* or *petroleum products* in, on, or at a *property*: (1) due to 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*.”

#### 7.1.1 Potential RECs Outside Property Limits

Facility Name: Univar USA/Geismar Facility/Houston  
Facility Location: 34200 Distribution Lane, Geismar, LA 70734  
Facility ID: 529  
Database: CERCLIS-NFRAP, RCRA LQG, State Equivalent NPL, Remediation  
Distance/Direction: 0.10 mi west

The Univar facility is actually located approximately ¼-mile east of the property at Distribution Lane and Van Waters and Rogers Lane. The facility has operated since the 1970s as a chemical distribution terminal that receives, temporarily stores, blends, and redistributes corrosive liquids and solvents. The facility is permitted as a large-quantity generator of numerous regulated materials. It also holds air and water permits. There are several minor permit violations noted in EDMS. CK did not find records of releases in EDMS from the Univar facility that may have impacted the property.

Facility Name: Old Inger Oil Refinery  
Facility Location: Hwy 75 4½ mi N of Town, Darrow, LA 70725  
Facility ID: 4714  
Database: Delisted NPL, Federal EC, State Equivalent NPL, State EC, Remediation  
Distance/Direction: 0.106 mi south-southwest

The Old Inger site was a former oil refinery and waste oil reclamation facility that began operation in 1967. The four primary areas of the site included the surface tankage, the waste lagoons, the swamp, and the buried waste area. The facility was purchased by Old Inger Oil Refinery in 1976 and operated until March 1978. When the site was active, waste oils were brought to the facility by truck and by barge. The waste oils were processed in the cracking tower and stored onsite. Final products were generally shipped from the site by truck. The lagoons were used for disposal of waste sludges, oils, and surface water. Liquid would

occasionally be siphoned from one of the lagoons to the swamp to maintain storage capacity in the lagoon. The siphoning process resulted in the discharge of oily materials into the swamp. Contamination at the site resulted from tanks being overfilled, discharges to the lagoons and swamps, and drums and construction debris being buried in lagoons. A large spill occurred in March 1978 that resulted in the discharge of used oil into the swamp. After the spill occurred in 1978, ownership of the property changed. The new owners intended to clean up the site. However, the new property owners found the cleanup to be uneconomical and abandoned the site in 1980.

The Louisiana Environmental Control Commission formally declared the site abandoned in 1981. The site was found to be contaminated with a wide variety of organic and inorganic compounds in sludges, soil, sediments, ground water, and surface water. Surface water in the swamp and the lagoons were also determined to be impacted by site contamination. The site was placed on the NPL in September 1983.

Between April 1983 and August 1988, five emergency removal actions were conducted at the site. These removal actions involved providing site security, providing control of migration of onsite contamination, excavation, consolidation, and containment of soils, and sampling and analysis. The contaminants of concern included heavy metals, phenols, benzene, naphthalene, benzo(a)pyrene, and benzo(a)anthracene.

The remedy selected in the 1984 Record of Decision (ROD) included the closing and sealing of an onsite ungrouted well; carbon adsorption treatment; in situ treatment, containment, and capping of heavily contaminated soils; land use restrictions; and ground water monitoring. Results of the ground water evaluation supported the issuance of an Explanation of Significant Differences (ESD) and a Final Close Out Report (FCOR) on September 12, 2006. In 2007, the EPA completed a Five-Year remedy review and found the remedy protective of public health and the environment.

#### Additional Facilities

CK reviewed the 2013 User-provided Phase I ESA, which identified four additional plottable sites within ASTM-search radii that did not appear on the EDR database report: Occidental Chemical Corporation (LDEQ Agency Interest [AI] Number 3400), Shell Chemical Company – Geismar Facility (AI Number 1136), Air Product & Chemicals, Inc. – Syngas Plant #1 (AI Number 2679), and Carline Tank Services, Inc. – Geismar Facility. CK observed these facilities to be present within the vicinity of the property.

Occidental Chemical Corporation (OxyChem) is located at 8318 Ashland Road, Geismar, LA approximately 1,400 feet northeast of the property. The facility has been an active manufacturing facility since 1968. EDMS records indicate Oxychem has reported numerous unauthorized discharges which involved spills of various chemicals. However, the majority of releases were contained and cleaned up during the facility's emergency response efforts, properly disposed, and the incident files closed.

The facility has had several notable incidents resulting in long-term groundwater monitoring. None of these incidents appear to have impacted the property. They include groundwater monitoring in five water-bearing units beneath the facility: B zone (8 to -4 feet MSL), D Zone (-24 to -47 feet MSL, F/G Zone (-65 to -110 feet MSL), 180 Foot Zone (-170 to -190 feet MSL), and the Norco Aquifer (-210 to -360 feet MSL). The extensive investigations identified 21 constituents of concern (COCs) at the site, all of which are chlorinated hydrocarbons. A Groundwater Recovery System at the site has been removing dense non-aqueous phase liquids (DNAPL) since 1981 as reported in quarterly groundwater reports. Records indicate that the network of monitoring wells is limited to the facility and the few off-site wells do not extend beyond Ashland Road to the south. A few off-site wells are also located west of the railroad tracks in which the closest wells to the property are east of Distribution Lane that leads to the Univar facility. Although the direction of groundwater varies within each quarter, iso-concentration maps presented in the groundwater reports show that the groundwater areas of interest (AOI) are mostly within the boundaries of the plant proper with the exception of the B Zone and D Zone. The groundwater AOI at the B Zone extends west of the railroad tracks and into a portion of Ashland Road. However, the groundwater AOI does not appear to reach Distribution Lane. Within the D Zone, the groundwater AOI extends slightly west of the railroad tracks. Therefore, none of the groundwater concerns at this facility are seen to have any impacts on the subject property.

An EDMS records search indicates Oxychem conducted a Corrective Action at a caustic spill area along the railroad tracks northeast of the property. A caustic release had reportedly occurred at the facility north of Ashland Road and the railroad tracks. The site of the release is approximately 1,600 feet northeast of the property. The Corrective Action Report does not indicate impact extending into the property.

EDMS records indicate Oxychem conducts semiannual groundwater monitoring as a result of a 1989 EDC Pipeline Release on BASF Property (Site 1) and a 1994 EDC Pipeline Release on BASF Property (Site 2). Both sites are greater than one mile from the property. Therefore, based on the distance, the EDC releases are not likely to have impacted the property.

Shell Chemical Company – Geismar Plant (Shell), located at 7594 LA Highway 75, Geismar, LA is approximately 600 feet north of the property. Records indicate the facility has conducted soil and groundwater investigations and Risk Evaluation/Corrective Action Program (RECAP) Evaluations within the various water-bearing zones on the facility. However, a review of the records dating back to 2005 indicates the impacted areas are localized within the facility with no offsite migration of COCs, and these investigations and/or corrective actions have obtained No Further Action (NFA) status. Therefore, it does not appear that operations at Shell have impacted the property.

Air Products & Chemicals, Inc. – Syngas Plant # 1 (Air Products), 8013 Highway 3251, Geismar, LA is located at the southern edge of Shell near the railroad tracks approximately 800 feet north of the property. Air Products primarily operates under their Title V Permit and NPDES water discharge permit, according to EDMS records. Records indicate that in 2005, the facility reported an unauthorized release of a liquid that contained ethanol and isopropyl alcohol resulting from heavy rains causing a tank overflow onto surrounding ground. The spillage was reportedly contained on site within the secondary containment ditch system.

The 2013 Phase I ESA reported that Carline Tank Services, Inc. – Geismar Facility (Carline Tanks), 7268 Highway 75, Geismar, LA, located adjacent and west of the property and east of the Mississippi River levee, is a barge repair and cleaning facility conducting a combination of boat repair and boat cleaning. It was documented that the barges cleaned most commonly contained dry bulk commodities (grains, food additives and other biological feedstock, pig iron, iron ores, minerals, food products, scrap aluminum, fertilizers, rigger products, wood products, stone and other miscellaneous items) with no cleaning conducted on piping, vessels or tanks that have contained petroleum products. Carline Tanks holds an LDPEs permit; no violations that are likely to have impacted the property were noted.

### **7.1.2 Potential REC at the Property**

A review of EDMS documents related to Southwood Terminal (AI #169267) revealed a February 2010 response letter from LDEQ to the submittal of a Phase II ESA dated January 2009. The Phase II ESA is not included in LDEQ's files; however, the letter indicates that concentrations of constituents analyzed in the soil and groundwater as a part of the Phase II ESA fell below applicable LDEQ standards, with the exception of pentachlorophenol in one groundwater sample. The LDEQ states that a risk evaluation, if conducted, would determine that the detected concentration of pentachlorophenol would be protective of groundwater use at the property. A copy of the letter is included in **Appendix B**.

Six monitoring wells registered to Shell plot on the property in state databases. The property owner has no knowledge of these wells on the property, the wells were not observed on the property, and a Shell representative indicated that Shell has no wells outside of its facility. Additionally, the User-provided 2013 Phase I ESA concluded that the wells were plotted incorrectly and belonged to Occidental Chemical. Therefore, it is likely that the wells are incorrectly plotted and not actually located on the property.

The User-provided Phase I ESA noted an in-ground brick structure, a wooden structure, and a wooden wagon on the property. CK did not observe these items during site reconnaissance. None were considered RECs in the 2013 report.

## **7.2 Opinion**

A review of federal, state, and local environmental databases, historical research, interviews, and site investigations revealed no evidence that the facilities located in the vicinity of the property have impacted environmental conditions at the property. Because the EPA has determined that no further action is planned, engineering controls are in place, and soil and groundwater sampling at the property has indicated no on-site impact (see Section 7.1.2), CK considers the Old Inger Oil Refinery to be a historical REC that does not represent a current REC at the property. No RECs were noted on the property.

## **7.3 Data Gaps**

Data gaps are defined in ASTM E 1527-13 Section 3.2.21, *data gap*, as a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. No significant data gaps were encountered.

## **7.4 Conclusions**

CK has performed this Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM E 1527-13 for approximately 183.5-acre Parks/Geismar property located east of LA Highway 75 and south of LA Highway 3251 (Ashland Road). Any exceptions to, or deletions from this practice are described in Section 1.4, Limitations and Exceptions, of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property.

## **7.5 Deviations**

The following deletions or deviations from the ASTM Standard Practice E 1527-13 were made during this investigation:

- In accordance with CK's agreement with the User, title records were not reviewed.
- Local and state government officials were not interviewed as part of this Phase I ESA because no clarification of the environmental documentation relating to the subject property was required. However, inquiries into state government files were performed online and through EDR's government records searches.

## 7.6 Signature and Qualifications of Environmental Professional

"I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental professional as defined in §312.10 of 40 CFR 312."

"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."



Jennifer Lindquist, P.E.  
Senior Environmental Geologist

Ms. Jennifer Lindquist is a Professional Geologist with over 20 years of experience in the environmental field and has performed and reviewed numerous environmental studies. Ms. Lindquist has a B.S. degree in Environmental Science and Geology and a M.S. degree in Environmental Science. Ms. Lindquist's resume is presented in **Appendix H**.