CSRS | BUILDING STRONGER, SMARTER COMMUNITIES TOGETHER.

Exhibit CC. Terre Haute Development Phase I Environmental Site Assessment

LOUISIANA ECONOMIC DEVELOPMENT CERTIFIED SITE

GREATER NEW ORLEANS INC
REGIONAL ECONOMIC DEVELOPMENT

Terre Haute Development Phase I Environmental Site Assessment

Report Date: October 01, 2020

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Terre Haute Development
West Airline Highway and Terre Haute Road • St. John the Baptist Parish • Louisiana • 70084

Conducted For:
GNO, Inc.
1100 Poydras Street, Suite 3475 • New Orleans • Louisiana • 70163

Prepared by Rob Tootle
Project Manager
CEG Assessments

Reviewed by Amanda Leitzman Roman
Executive Vice President
CEG Assessments

CEG ASSESSMENTS • P.O. Box 3750 • St. Francisville • LA • 70775
866.557.6564 • eFax 800.650.8984

TABLE OF CONTENTS

TABLE OF CONTENTS

EXECUTIVE SUMMARY

CEG performed a Phase I Environmental Site Assessment that included on-site observations of the accessible areas of the Terre Haute Development (the "Project") on September 22, 2020. The Project is located at West Airline Highway and Terre Haute Road in St. John the Baptist Parish, Louisiana 70084 and is located on approximately 180 acres.

The following summarizes the independent conclusions representing CEG's best professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the Client, owner, or their representative have been assumed to be correct and complete. Additionally, the conclusions presented are based on the conditions that existed at the time of the assessment.

The Project consists of a portion of two contiguous, irregular-shaped parcels totaling approximately 180 acres. The Project operates as a privately-owned agricultural facility and recreational camp. Agricultural activities at the site consist of an approximately 160-acre lease of row-crop sugarcane production, held by Uncle Sam Planting. Improvements to the Project include a cabin, a maintenance shed, gardening shed, and barn, and associated gravel-paved access roads.

Based upon interviews and a review of chain of title information, local agency records, historical maps, city directories, and aerial photographs, the Project has existed as primarily agricultural land since at least 1952. In the 1952 and 1961 aerial photographs, the Project and surrounding properties are depicted as agricultural land. A small commercial-scale structure is first evidenced adjacent to the southeast of the Project in the 1972 aerial photograph. The cabin and maintenance building at the Project were constructed in the early 1980s and are first evidenced in the 1982 aerial photograph. The east adjacent property, the Port of South Louisiana Executive Regional Airport, is first depicted in the 1988 aerial photograph. The construction of the storage building at the Project, located to the north of the agricultural pond, is first evidenced in the 2006 aerial photograph. By 2010, development of the Project and surrounding area stabilized with the construction of the south adjacent retail gasoline station.

CEG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of West Airline Highway and Terre Haute Road in St. John the Baptist Parish, Louisiana 70084. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this report.

This assessment has revealed no evidence of Recognized Environmental Conditions (RECs), Historical RECs (HRECs), or Controlled RECs (CRECs) in connection with the Project.

However, the following item of environmental note was identified:

Hazardous Materials / Petroleum Products Storage and Handling (Section 5.2)

- Numerous flammable materials are used and stored at the Project, including gasoline, various automotive maintenance fluids, various agricultural fluids, and various maintenance materials, such as paint. The materials observed do not appear to pose a hazard to the Project, provided they are used as designed, are properly handled, and all regulations regarding their use are followed. Although no indication of a significant release of hazardous materials or petroleum products was observed during CEG's site visit, the flammable materials observed were not found to be stored within a flammable materials cabinet.

The following actions are recommended:

- Flammable materials should be properly stored within flammable materials cabinets.

1.0 INTRODUCTION

1.1 Site Description

CEG has completed a Phase I Environmental Site Assessment of the Terre Haute Development (the "Project") located at West Airline Highway and Terre Haute Road in St. John the Baptist Parish, Louisiana 70084. The assessment was performed at the Client's request using the methods and procedures consistent with good commercial and customary practice designed to conform to acceptable industry standards. The on-site Environmental Site Assessment consisted of a walk-through observation of the accessible areas and interviews with facility personnel and local agency representatives. On-site activities and interviews were conducted by Angela Ellis, Executive Vice President, with:

- Stephen Guidry, On-site Point of Contact (POC) and Project Owner

A Pre-Survey Questionnaire was completed as a part of this assessment which is included in the Appendices. The Questionnaire was completed with the POC. Information obtained from the Questionnaire has been used in the preparation of this report.

Areas accessed included: Project landscaped grounds; the perimeter of wooded areas; the perimeter of the row cropped fields; interiors of the storage buildings, chicken coop, and gardening shed; and the Project boundaries. Specific areas for which access was unavailable included wall cavity spaces, pipe chases, above drop ceilings; locked interior areas in the storage shed; and the interior of the wooded areas and row cropped fields.

Weather conditions at the time of the Project assessment were rainy, with temperatures in the 70's (F) and light winds.

1.2 Scope of Services

CEG reviewed available federal, state, and local records in an effort to identify sites of known or suspected hazardous waste activity located at or near the Project which could have an adverse impact on the Project. In an attempt to determine whether historical uses of the Project and surrounding area have had an environmental impact on the Project, CEG interviewed individuals knowledgeable about the Project and reviewed available pertinent records and documents. This assessment is based on the evaluation of the information gathered, laboratory analysis of samples collected (when required), and accessibility at the time of the assessment.

1.3 Standard of Care

The purpose of this report is to provide the Client an assessment concerning environmental conditions (limited to those issues identified in the report) as they existed at the Project. The assessment was conducted utilizing generally accepted Phase I industry standards using the American Society for Testing and Materials (ASTM) Standard Practice E 1527-13. The scope of work included an evaluation of:

- The Project history in an attempt to identify any possible ownership(s) and/or uses that would suggest an impact to the environmental integrity of the Project as identified through review of reasonably ascertainable standard historical sources.

- Physical characteristics of the Project as identified through review of reasonably ascertainable topographic maps.

- Current Project conditions (as applicable), including compliance with appropriate regulations as they pertain to the presence or absence of:

  - Facility storage tanks, drums, containers (above or below ground), etc.

  - Transformers and other electrical equipment which utilize fluid which may potentially contain PCBs.

  - The use of hazardous materials/chemicals and petroleum products, and/or the generation, treatment, storage, or disposal of hazardous, regulated, or medical waste.

  - An evaluation of information contained in programs such as the NPL, CERCLIS, SHWS, RCRIS, SWF, LUST, and other governmental information systems within specific search distances of the Project. This evaluation was performed to identify any sites that would have the potential to impact the environmental integrity of the Project.

- The regulatory agency report provided is based on an evaluation of the data collected and compiled by a contracted data research company. The report is based on a radius search which focuses on both the Project and neighboring sites that may impact the Project. Neighboring sites listed in governmental environmental records are identified within a specific search distance. The search distance varies depending upon the particular government record being checked. The search is designed to meet the requirements of ASTM Standard E 1527-13. The information provided is assumed to be correct and complete.

- Visual observation of the Project and adjacent properties and review of readily available historical and regulatory information to identify the potential for known or suspected migration of hazardous substances or petroleum products in any form, including solid and liquid at the surface or subsurface, and vapor in the subsurface. Note: This assessment is not intended to comply with *E2600 Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*.

1.4 Additional Scope Limitations, ASTM Deviations, and Significant Data Gaps

In addition, at the Client's request, the assessment included the following non-scope items:

- A review of the physical characteristics of the Project as identified through review of reasonably ascertainable wetlands, flood plain, soils, geology, and groundwater data.

- A screening approach for the potential existence of:

- Asbestos, including the identification of all suspect materials in accessible areas (interior and exterior). The materials are considered suspect until tested and proven otherwise. Friable materials are those which can be easily crumbled or pulverized by hand pressure. This screening approach is not a comprehensive (i.e., AHERA-Style) asbestos survey, nor is it intended to fulfill the NESHAP requirements for demolition/renovation purposes, but is intended to identify the potential for an asbestos hazard in accessible areas. This screening is not intended to be used for demolition, abatement, renovation, or repair work. The basis for "suspect" determination is taken from the materials listed in Appendix G of the United States Environmental Protection Agency (USEPA) publication Managing Asbestos in Place (the "Green Book"). Therefore, all materials listed in the Green Book which were installed prior to 1981 are considered suspect with the exception of resilient floor tile, asbestos-cement board (transite), and roofing felt, which are considered suspect regardless of installation date (these materials continue to be manufactured and installed in the United States).

- Radon gas propensity, through the review of the USEPA's Map of Radon Zones.

- Lead-based paint for all properties constructed prior to 1978. The basis for this determination is taken from the Lead Paint Poisoning Act passed by the Congress of the United States that banned the use of lead paint starting January 1, 1978. Therefore, all paint applied prior to 1978 is considered suspect.

- Lead in water, based on information provided by the municipal water provider.

- Mold, including the identification of visible mold growth, conditions conducive for mold growth, and evidence of moisture in accessible areas of the Project. In addition, CEG interviewed Project personnel regarding any known or suspected mold contamination, water intrusion, or mildew like odor problems. Sampling was not performed as a part of this assessment. CEG notes that this assessment does not constitute a comprehensive mold survey of the Project, and the conclusions made are based solely on observable conditions in readily accessible interior areas of the Project on the assessment date.

Data gaps in information exist from 1940 to present. No further investigation appears warranted to address this data gap and because the data gaps were not determined to be material in identifying a Recognized Environmental Conditions (RECs) they are not considered by ASTM standards to be *significant* and, therefore, are not individually addressed in this report.

The information presented in this Phase I ESA report is based on visual observations, records information, and interviews with persons knowledgeable about the Project. Other conditions may exist that were not detected or were not made known to CEG. In addition, it is known that subsurface conditions can change with time and under human

influences. Due to the inherent limitations of Phase I ESA reports, CEG does not provide a certification as to the absence of hazardous materials that may have potentially impacted the environmental setting at the Project.

CEG's recommendations and determinates expressed are reliant on occupant reporting, regulatory records, and a one-time visit that represents a "snap-shot" in time. CEG makes no representations that the information relied upon provided by others is true and accurate. CEG cannot under any circumstances warrant or guarantee that not finding regulatory, historic or active indicators of hazardous materials means that hazardous materials or contamination does not exist at the Project. It should be noted that the absence of reported regulatory violations and current good-housekeeping practices does not necessarily constitute the absence of adverse impacts to the environmental integrity of the Project. Additional work, including subsurface testing can minimize risks for potential environmental concerns, but cannot eliminate these risks altogether.

1.5 Reliance

This report is exclusively for the use and benefit of GNO, Inc. and all affiliates and subsidiaries thereof. The purpose for which this report is used shall be limited one calendar year from the date of this report, and limited to the use as stated in the contract between the client and CEG.

This report is not for the use or benefit of, nor may it be relied upon by any other person or entity, for any purpose without the advance written consent of CEG. In expressing the opinions stated in this report, CEG has exercised the degree of skill and care ordinarily exercised by a reasonable prudent environmental professional in the same community and in the same time frame given the same or similar facts and circumstances. Documentation and data provided by the Client, designated representatives of the Client or other interested third parties, or from the public domain, and referred to in the preparation of this assessment, have been used and referenced with the understanding that CEG assumes no responsibility or liability for their accuracy.

1.6 Client Provided Information

The Client retained CEG to complete this Phase I Environmental Site Assessment for financing purposes for a purchase.

The independent conclusions represent our professional judgment based on information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the Client or their representative has been assumed to be correct and complete. The conclusions presented are based on the data provided, observations, and conditions that existed on the date of the on-site visit.

If you have any questions regarding this report, please contact CEG at 225.341.1474.

RESEARCHED BY: Rob Tootle
Project Manager

SURVEYED BY: Angela Ellis
Executive Vice President

WRITTEN BY:

Rob Tootle
Project Manager

REVIEWED BY:

Amanda Leitzman Roman
Executive Vice President

2.0 PHYSICAL SETTING

The Project is located at West Airline Highway and Terre Haute Road in St. John the Baptist Parish, Louisiana 70084.

2.1 Project Description

The Project consists of a portion of two contiguous, irregular-shaped parcels totaling approximately 180 acres. The Project operates as a privately-owned agricultural facility and recreational camp. Agricultural activities at the site consist of an approximately 160-acre lease of row-crop sugarcane production, held by Uncle Sam Planting. Improvements to the Project include a cabin, a maintenance shed, gardening shed, and barn, and associated gravel-paved access roads.

The Project is serviced by a private water well and septic system. Refer to Sections 5.10 and 5.3, respectively, for further information.

Domestic hot water is generated by and provided to the cabin building and storage building by one electric water heater in each building.

Heat and air-conditioning are supplied to the cabin building from one electrically-operated split system, with a pad-condensing unit and interior propane-fired furnace unit. Conditioned air is distributed via thermostatically controlled, ducted supply and return systems.

2.2 Miscellaneous Systems

- **Tenant equipment** - Numerous air compressors and residual and operational agricultural equipment
- **Emergency generator** - None
- **Elevator** - None
- **Trash compactor** - None
- **Sump pump** - None
- **Sewerage treatment** - None

2.3 Environmental Settings

TARGET PROPERTY ADDRESS:	West Airline Highway and Terre Haute Road
TARGET PROPERTY CITY:	St. John the Baptist Parish
TARGET PROPERTY STATE:	Louisiana
TARGET PROPERTY ZIP:	70084
LATITUDE (NORTH):	30.081216
LONGITUDE (WEST):	-90.588445
UNIVERSAL TRANSVERSE MERCATOR:	Zone 15
UTM X (METERS) & UTM Y (METERS):	UTM X (Meters): 732438.4 UTM Y (Meters): 3330057.2

2.3.1 Topography

Review of the *Reserve, LA* Topographic Quadrangle map, published by the United States Geological Survey (USGS) and dated 2018 indicated the following:

- The Project has an average elevation of approximately 10 feet above mean sea level. Elevations range from approximately 15 feet in the south-central portion of the Project to approximately 5 feet in the northwestern portion of the Project. The slope of the Project is estimated between 0 and 1 percent in a northwesterly direction.

- The slope in the general topographic region of the Project appears to be to the north.

- The nearest surface water feature is the Mississippi River located approximately 1.6 miles south of the Project. It should be noted that the Maurepas Swamp wetlands are located approximately 2,000 feet north of the Project.

A copy of the topographic map is appended.

2.3.2 Wetlands

A National Wetlands Inventory (NWI) Map for the area of the Project, published by the United States Fish and Wildlife Service, was obtained from the US Fish and Wildlife Service website. Review of the NWI map and observations during the on-site assessment identified the following:

- A designated Freshwater Pond Wetland area (PUBHx) is located on the eastern portion of the Project. The designated Freshwater Pond corresponds with an agricultural pond visually identified by CEG in the location accurately described by the NWI map. No evidence of a release of hazardous substances or petroleum products was observed in the vicinity of this feature.

A copy of the wetlands map is appended.

2.3.3 Floodplain

Review of the Flood Insurance Rate Map, published by the Federal Emergency Management Agency (FEMA) and dated November 4, 2010, indicated the following:

- The Project is located in Zone X (Shaded), defined as areas of moderate flood hazard, usually the area between the limits of the 100-year and 500-year floods.

A copy of the floodplain map is appended.

2.3.4 Soils/Geology

Review of the Soil Survey published by the United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) indicated the following:

- The Project is located in an area comprised of the soil type known as Cancienne silt loam (CmA), 0 to 1 percent slopes.
- The Cancienne series is considered to be a somewhat poorly drained, silt loam and silty clay loam textured soil.
- Depth to the water table is approximately 5 to 10 feet.

Review of information obtained from the USGS Geology of the Conterminous United States, King and Beikman, 1974, indicated the following:

- The Project is located within the Mississippi Alluvial Plain physiographic province of Louisiana. The Project is further located over a Quaternary-aged formation consisting of sedimentary deposits.

2.3.5 Groundwater Hydrology

Shallow groundwater flow is expected to follow the ground level slope of surface elevations towards the nearest open body of water or intermittent stream. The direction of this flow at the Project is anticipated to be in a northerly direction.

Estimated groundwater levels may vary due to seasonal fluctuations in precipitation, local usage demands, geology, underground structures, or dewatering operations.

3.0 HISTORICAL REVIEW

Review of information available from the owner indicated that the Project is known as West Airline Highway and Terre Haute Road, St. John the Baptist Parish, Louisiana 70084.

3.1 Prior Use Interviews

CEG met with Stephen Guidry, On-site Point of Contact (POC) and Project Owner, who was cooperative and provided information that appeared to be accurate, based upon our subsequent site observations. It is CEG's opinion that the POC was knowledgeable about the Project and about questions CEG posed during the interview process. According to the POC, the Project was developed over a century ago into the current agricultural use. The POC was unaware of any prior uses of the Project. The POC has been associated with the Project directly since 1996, although the Project has been family-owned for over a century.

CEG contacted the St. John the Baptist Parish Assessor's Office for information concerning current property ownership, abbreviated legal description, construction date(s), building and land area and use, addresses associated with the Project, and/or any other environmentally relevant items. A legal description for the Project is provided in the appendices. According to the Project property cards, the Project is currently owned by TEN - G LLC and was constructed in the early 1980s. The Project consists of approximately 180 acres of land. According to Assessor's Office records, there is no street address associated with the Project.

CEG contacted the St. John the Baptist Parish Planning and Zoning Department, which includes the Building Inspections department, for information on any potential building code violations, outstanding permits, or any other environmentally relevant items. As of the time of this writing, no response to the Freedom of Information Act request has been received from the Department.

CEG contacted the St. John the Baptist Parish Fire Department for any information regarding fire code violations or items of environmental note. As of the time of this writing, no response to the Freedom of Information Act request has been received from the Department.

3.2 Historical City Directories

Historical city directories were reviewed for the Project as provided by Environmental Data Resources Inc. (EDR). City directories have tenant listings by address. This review revealed the following information:

Project Address:

- **1986** - The Project streets were not identified in this directory.
- **1992, 1995, 2000, 2005, 2010, 2014 and 2017** - An address likely to be associated with the Project is not listed in these directories.

Surrounding Properties:

- The south adjoining gasoline station and casino, addressed at 4450 West Airline Highway, was identified as Fattys II Restaurant / Reserve Truck & Casino in 2010; Chevron Station Reserve / Super Stop Enterprises Inc. in 2014, and SuperStopEnterprises Inc. in 2017. Reserve Truck Stop was listed in the UST database, further discussed in Section 4.0.
- The southeast adjacent property, addressed at 4317 West Airline Highway, was identified as Louisiana Light and Power in 2000 and Entergy in 2014. Entergy was listed in the DEL SHWS, ASBESTOS, and REM databases, further discussed in Section 4.0.
- No other environmentally significant listings were identified.

A copy of the The EDR-city directory image report is appended.

3.3 Historical Maps

Historical Sanborn Fire Insurance Maps

Historical Sanborn Fire Insurance maps are detailed scale drawings that show the location and use of buildings and structures that occupied a given area. CEG contacted EDR in an attempt to determine if there were any historical maps in the EDR Historic Map Collection. However, there was no historical map coverage for the Project in the EDR Historical Map Collection, for the period covering the years 1867 to present. As a general rule, the absence of historical maps for a given area tends to support evidence that the area was not significantly developed.

A copy of the "No Coverage" letter from EDR is appended.

Historical Topographic Maps

Historical topographic maps are maps that show the topography or land contours, by means of contour lines. Contour lines are curves that connect contiguous points of the same altitude. Topographic maps show elevations of land, building locations, and sometimes historical use of a given area. CEG reviewed available historical topographic maps as available from EDR. The review of the topographic maps revealed the following:

The 1892 topographic map revealed the following information:

- **Project:** The Project appears to be developed with apparent unimproved roads without any structures on this map.
- **Adjacent properties:** The adjacent properties to the north, east, south, and west are depicted as developed with apparent unimproved roads without any structures on this map. Notations on the map indicate marshland further to the north and apparent drainage creeks / ditches and railroad tracks further to the east. Development and railroad tracks are depicted further to the south.

The 1935, 1940, 1949, and 1962 topographic maps revealed the following information:

- **Project:** The Project appears to be developed unimproved roads, and drainage ditches are depicted on the property on these maps.
- **Adjacent properties:** Airline Highway is shown to have been developed along the southern perimeter of the Project. The adjacent properties to the north, east, south, and west are depicted as developed with apparent unimproved roads without any structures on this map. Notations on the map indicate marshland further to the north and apparent drainage creeks / ditches and railroad tracks further to the east. Development and railroad tracks are depicted further to the south.

The 1981 topographic map differs from the previous topographic maps in that:

- **Project:** The Project appears to be developed with small structures along the southeastern portion of the property.
- **Adjacent properties:** The southeast-adjacent property is shown to be developed with building.

The 1994, 1999, and 2012 topographic maps differ from the previous topographic map in that:

- **Project:** The Project appears as previously depicted with the addition of a manmade pond in the east-central portion of the property, just north of the structures.
- **Adjacent properties:** The east-adjacent property is shown to be developed with a landing strip listed as St. John the Baptist Parish Airport.

The 2018 topographic map, which utilizes an aerial photograph background image, differs from the previous topographic maps in that:

- **Project:** The Project appears to be agricultural land and developed with small structures along the southeastern portion of the property.

- **Adjacent properties:** An apparent radar pad is depicted on the north-adjacent property. The south-adjacent property is shown to be developed with an apparent gasoline station and convenience store.

Copies of the topographic maps are appended.

3.4 Aerial Photography

CEG reviewed available aerial photographs as provided by EDR and Google Earth. CEG's aerial photographs search revealed the following:

The 1952 and 1961 aerial photographs revealed the following information:

- **Project:** The Project appears to be developed as agricultural land with unimproved roads bisecting field lines. Vehicular access is available from a south-adjoining road.

- **Adjacent properties:** The adjacent properties to the north, east, south, and west are depicted as agricultural land on these aerial photographs. An east-west trending roadway immediately abuts the southern property boundary.

The 1972 aerial photograph differs from the previous aerial photographs in that:

- **Adjacent properties:** The adjacent property to the southeast is now depicted as developed with a structure. An apparent commercial structure is also shown further to the south.

The 1982 aerial photograph differs from the previous aerial photograph in that:

- **Project:** The Project now appears to be developed with structures located along the southeast portion of the property that are consistent with residential and/or farm support uses.

The 1988 aerial photograph differs from the previous aerial photograph in that:

- **Project:** The Project appears to be developed with an additional structure and a pond along the southeast portion of the property.

- **Adjacent properties:** The adjacent property to the east is developed with an apparent runway for a small airport.

The 1998 aerial photograph differs from the previous aerial photograph in that:

- **Adjacent properties:** Additional structures have been developed at the east-adjoining airport. An apparent radar pad is shown to the north.

The 2005 and 2007 aerial photographs differ from the previous aerial photograph in that:

- **Project:** The Project appears to be developed with additional structures along the southeast portion of the property.

The 2009, 2010, 2013, 2016, 2017, and 2019 aerial photographs differ from the previous aerial photographs in that:

- **Adjacent properties:** An apparent gasoline station and convenience store facility is depicted developed south-adjoining property.

Copies of representative aerial photographs are appended.

3.5 Environmental Liens

The user did not engage CEG to review title and judicial records for environmental liens or Activity and Use Limitations (AULs) recorded against the Project. Furthermore, these documents were not provided to CEG for review. The lack or inability to obtain this information represents a data gap. However, based on the findings of this report, the absence of this information is not considered a significant data gap.

3.6 Previous Investigations / Assessments

CEG was not provided with any previously conducted environmental reports.

3.7 Plans and Specifications

As-built/renovation-site plans, drawings, or specifications were not available for review at the Project or local agency offices visited for this assessment.

3.8 Title Records

CEG conducted a limited Chain of Title Search for the Project. Records indicate the current owner of the Project to be TEN-G, LLC, which acquired the property in 1997. The Parcel Card did not list previous owners of the Project.

3.9 Historical Summary

Based upon interviews and a review of chain of title information, local agency records, historical maps, city directories, and aerial photographs, the Project has existed as primarily agricultural land since at least 1952. In the 1952 and 1961 aerial photographs, the Project and surrounding properties are depicted as agricultural land. A small commercial-scale structure is first evidenced adjacent to the southeast of the Project in the 1972 aerial photograph. The cabin and maintenance building at the Project were constructed in the early 1980s and are first evidenced in the 1982 aerial photograph. The east adjacent property, the Port of South Louisiana Executive Regional Airport, is first depicted in the 1988 aerial photograph. The construction of the storage building at the Project, located to the north of the agricultural pond, is first evidenced in the 2006 aerial photograph. By 2010, development of the Project and surrounding area stabilized with the construction of the south adjacent retail gasoline station.

4.0 REGULATORY DATABASE REVIEW

Based on review of the regulatory database report, and by cross-referencing name, address, and zip code, CEG concludes that the Project is not a listed site. Furthermore, the area search of the Project for sites listed in these databases identified various sites. The regulatory database report is included in the Appendices.

CEG also reviewed the unmappable sites in the database report, cross-referencing addresses and site names. Unmappable sites are environmental risk sites that cannot be plotted with confidence, but can be located by zip code or city name. In general, a site cannot be geocoded because of inaccurate or missing location information in the record provided by the agency. Any identified unmappable site within the specified search radii is included below.

The following databases were reviewed for this assessment:

- ***NPL Listing:*** The National Priorities (Superfund) List (NPL) is United States Environmental Protection Agency (USEPA's) database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program.
- ***Delisted NPL Listing:*** The Delisted NPL database is a listing of sites which have been deleted from the NPL list by the USEPA.
- ***RCRA-TSD Facilities Listing:*** The USEPA's Resource Conservation and Recovery Act (RCRA) Program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA-TSD database is a compilation by the USEPA of reporting facilities that transport, treat, store or dispose of hazardous waste.
- ***RCRA-Corracts Facilities Listing:*** The USEPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Sites Listing contains information pertaining to hazardous waste treatment, storage, and disposal facilities (RCRA TSD) which have conducted, or are currently conducting, a corrective action(s) as regulated under RCRA.
- ***SEMS (formerly CERCLIS) Listing:*** This database is a compilation of sites which the USEPA has investigated or is currently investigating for a release or threatened release of hazardous substances.
- ***NFRAP Listing:*** This database contains information regarding sites which have been removed from the USEPA CERCLIS database.
- ***RCRA-Generator Listing*****:** The USEPA identifies and tracks hazardous waste from the point of generation to the point of disposal through the Resource Conservation and Recovery Information System (RCRIS). The RCRIS-Generators database is a compilation by the USEPA of facilities that report hazardous waste generation. Hazardous waste generators tracked under the (RCRA are classified as either a Conditionally Exempt Small Quantity Generator (CESQG), Small Quantity Generator (SQG), or Large Quantity Generator (LQG). A RCRA-CESQG is a facility that generates less than 100 kilograms of hazardous waste, or less than one kilogram of acutely hazardous waste per month. A RCRA-SQG is a facility that generates between 100 kilograms and 1,000 kilograms of hazardous waste per month. A RCRA-LQG is defined as a facility that generates over 1,000 kilograms of hazardous waste, or over 1 kilogram of acutely hazardous waste per month.
- ***ERNS:*** The Emergency Response Notification System (ERNS) is a national database used to collect information on reported releases of oil or hazardous substances.
- ***Federal institutional control registry:*** This database contains information on sites with federal institutional controls.
- ***Federal engineering control registry:*** This database contains information on sites with federal engineering controls.
- ***SHWS Listing:*** This database is a comprehensive listing of sites which are considered to be a threat to the public health and welfare by the State of LA Department of Environmental Quality. Further, this is the state equivalent of a CERCLIS List.
- ***SWF Listing:*** This database is a comprehensive listing of all State Permitted Solid Waste Landfills.
- ***LUST*****:** This database contains a summary of information pertaining to leaking underground storage tank (LUST) sites identified by the state.
- ***Underground Storage Tanks:*** This database contains a summary of information pertaining to registered underground storage tanks (USTs) identified by the state.
- ***State Brownfield sites:*** This database contains information on brownfield sites as maintained by the State**.**
- ***State Voluntary Cleanup Sites:*** This database contains a listing of sites which are in the State voluntary cleanup program.
- ***State institutional control registry*****:** This database contains information on sites with institutional controls as maintained by the State.
- ***Tribal LUST:*** This database contains information on Tribal LUST sites.
- ***Tribal UST*****:** This database contains information on Tribal UST sites.

- ***ASBESTOS:*** This State database lists property that have had asbestos abatement activities.

The following table indicates the number of sites identified for each regulatory database within the specified search radii:

DATABASE	ON-SITE	REMAINING WITHIN 1/8 MILE	1/8 - 1/4 MILE	1/4 - 1/2 MILE	1/2 - 1 MILE
NPL		0	0	0	0
Proposed NPL		0	0	0	0
NPL LIENS		0	0	0	0
Delisted NPL		0	0	0	0
CORRACTS		0	0	0	0
RCRA-TSDF		0	0	0	NR
RCRA-LQG		0	0	NR	NR
RCRA-SQG		0	0	NR	NR
US ENG CONTROLS		0	0	0	NR
ERNS		NR	NR	NR	NR
LUCIS		0	0	0	NR
SEMS		0	0	0	NR
SEMS-ARCHIVE		0	0	0	NR
US INST CONTROLS		0	0	0	NR
FEDERAL FACILITY		0	0	0	NR
RCRA-VSQG		0	0	NR	NR
FEMA UST		0	0	NR	NR
SHWS		0	0	0	0
DEL SHWS		1	0	0	0
SWF/LF		0	0	3	NR
LUST		0	0	0	NR
HIST LUST		0	0	0	NR
UST		1	0	NR	NR
AUL		0	0	3	NR
VCP		0	0	0	NR
BROWNFIELDS		0	0	0	NR
DEBRIS		0	0	1	NR
REM		1	0	4	NR
SWRCY		0	0	1	NR
HIST DEBRIS		0	0	0	NR
INDIAN LUST		0	0	0	NR
INDIAN UST		0	0	NR	NR
INDIAN VCP		0	0	0	NR

Name of Facility:	Reserve Truck Stop
Address of Facility:	4450 West Airline Highway
Distance:	Adjoining
Direction:	South
Database(s) Listed On:	UST
Gradient:	Upgradient
Comments:	This facility is listed as having a 10,000-gallon gasoline UST, a 16,000-gallon gasoline UST and a 16,000-gallon diesel UST that were installed in 2008. A 2018 LDEQ compliance inspection for this facility was obtained from the LDEQ website. The inspection report did not indicate any violations for this facility with regards to the facility's UST system. This gasoline station does not represent a recognized environmental condition to the Project based on the current regulatory status of this facility and absence of a reported release.

Name of Facility:	Entergy Reserve Office
Address of Facility:	4317 West Airline Highway
Distance:	Adjacent
Direction:	Southeast
Database(s) Listed On:	DEL SHWS, ASBESTOS, REM
Gradient:	Upgradient
Comments:	This facility is listed on the Asbestos database for having conducted asbestos abatement activities. Based on the nature of this listing and the type of material involved, this listing is not indicative of a recognized environmental condition to the Project. This facility is also listed on the DEL SHWS and REM regulatory databases for a release that was granted closure in July 29, 2016. A review of available information on the Louisiana Department of Environmental Quality file system revealed subsurface investigations performed at this property in 2005 and 2012, identified concentrations of dissolved extractable petroleum hydrocarbons (EPH), arsenic, and cadmium that exceeded LDEQ RECAP standards. An additional subsurface investigation at this property in 2013 indicated only dissolved arsenic exceeded LDEQ RECAP standards. The groundwater gradient at this property was determined to be in a north-northwesterly direction and toward a system of drainage ditches located northwest from this property. Based on conceptual modeling of on-site subsurface conditions, the LDEQ granted a No Further Action closure for the site. Based on the current regulatory status of this facility and conditions at the time of closure, the Entergy facility does not represent a recognized environmental condition to the Project at this time. Copies of subsurface investigation reports at this facility are available upon request.

Name of Facility:	ST. John the Baptist Parish Government - Airport Road Debris
Address of Facility:	356 Airport Road
Distance:	Adjacent
Direction:	East
Database(s) Listed On:	DEBRIS, SWF/LF
Gradient:	Crossgradient
Comments:	This facility is listed as a landfill for staging, chipping & grinding, composting, and burning of vegetative debris. It does not appear that actual landfilling activities are associated with this listing. Therefore, this listing does not represent a recognized environmental condition to the Project.

The remaining identified properties are either; release sites located greater than 500 feet cross- or down-gradient from the Project; do not include up-gradient release sites within 1,000 feet, and/or are identified in databases whose ASTM search radii are not beyond adjacent relative to the Project. Based on the distance of the identified properties relative to the Project, the estimated groundwater flow direction, and/or regulatory status, the remaining sites identified within the specified search radii are not anticipated to have adversely impacted the environmental integrity of the Project.

5.0 PROJECT RECONNAISSANCE

5.1 Operational Activities / Noteworthy Tenants

The Project consists of a portion of two contiguous, irregular-shaped parcels totaling approximately 180 acres. The Project operates as a privately-owned agricultural facility and recreational camp. Agricultural activities at the site consist of an approximately 160-acre lease of row-crop sugarcane production, held by Uncle Sam Planting. Improvements to the Project include a cabin, a maintenance shed, gardening shed, barn, and associated gravel-paved access roads.

Considering the onsite operations, permits, notifications and registrations do not appear to be required.

5.2 Hazardous Materials/Petroleum Products Storage and Handling

The Project is involved in the use of hazardous materials and petroleum products in the form of the following:

- Routine janitorial and maintenance supplies are present in retail-size up to five-gallon containers and is stored in designated areas. These materials are used for Project maintenance and upkeep.
- Gasoline is used at the Project for the fueling of light landscaping and agricultural equipment and is stored in five and six-gallon containers located in the maintenance shed.
- New motor oil is used at the Project for the maintenance of light landscaping and agricultural equipment and is stored in quart size and five-gallon pails located in the maintenance shed.
- Antifreeze and brake fluid is used at the Project for the maintenance of vehicle and agricultural equipment and is stored in quart to half gallon size containers located in the maintenance shed.
- Agricultural chemicals, including fertilizers, herbicides, fungicides, and insecticides, are present at the Project and are utilized in the operations and maintenance of the Project landscaping and grounds.
- Refrigerants, presumably R-12 and R-407c based on the color and nature of the refrigerant storage vessels, is used at the Project for the maintenance of light landscaping and agricultural equipment and is stored in the maintenance shed.
-
- Paint is used at the Project for maintenance and upkeep and is located in one-gallon to five-gallon containers in storage areas.
- Per the POC, propane is used at the Project as a fuel source for the cabin heat and stove, which is stored in one 300-gallon above-ground storage tank (AST). Smaller retail-size propane canisters are used at the Project for the fueling of equipment. According to the site contact, Lacox services the propane tank annually. Refer to Section 5.5 for further discussion of the AST.

The materials observed do not appear to pose a hazard to the Project, provided they are used as designed, are properly handled, and all regulations regarding their use are followed. Although no indication of a significant release of hazardous materials or petroleum products was observed during CEG's site visit, the flammable materials observed were not found to be stored within a flammable materials cabinet.

5.3 Waste Generation, Treatment, Storage, and Disposal

Visual observation for the generation, treatment, storage, and disposal of wastes was performed. CEG identified the following waste generation listed below.

- Domestic sewage is disposed to an onsite septic system situated on the southeast portion of the property.
- Municipal trash is stored in bins and disposed of by the municipal waste management system.
- One 55-gallon drum of unknown content was observed in the vicinity of the storage building. No indication of the previous contents of the drum was visible, and the container was closed. The drum appears old in nature. The POC indicated the drum is empty and not utilized. No staining was observed in the vicinity of the drum.

- Two 55-gallon drums containing waste oil were observed in the interior of the storage building. The drums appeared to be intact with no indication of staining observed.

- One waste tire was observed on the exterior concrete of the barn. Waste tires are reportedly disposed by a contracted waste hauler.

- Two five-gallon containers of 15W-40 were identified on the ground under agricultural equipment. No indication of a release from the containers observed at the time of the assessment.

- Residual and abandoned agricultural and mechanical equipment, including one approximately 300-gallon empty tank formerly containing propane, two approximately 200-gallon empty tanks formerly containing water, numerous derelict and residual agricultural and mechanical implements, and residual water pumps, were observed in the vicinity of the pond, the eastern portion of the property, and the storage and maintenance buildings.

Evidence of spills or staining was not observed in the areas of waste generation or pre-disposal storage. The concrete floors of the buildings appeared intact and no cracks were observed in the areas of waste generation or pre-disposal storage.

5.4 Polychlorinated Biphenyls (PCBs)

The Project is supplied with overhead secondary electrical service from three pole-mounted transformers. The transformers are designated as the property of the public utility. The units should be periodically inspected for leakage. If leakage is visible, the Project owner/manager should contact the public utility, which will remediate the situation. Should the units have to be replaced, the utility is responsible, provided the cause is equipment failure, not customer misuse. No leakage of the transformers was observed at the time of the assessment.

5.5 Facility Storage Tanks and Pipelines (above or below ground)

Visual observations for manways, vent pipes, fill connections, concrete pads, and saw cuts in paved areas did not identify any surface connections or disturbances that would indicate the potential for an underground storage tank (UST) installation at the Project. No underground storage tanks (USTs) were observed at the Project.

The Project contains the aboveground storage tank (AST) listed in the table below. Current Louisiana regulations do not require registration of this type of tank. Mr. Guidry was unaware of any releases from the AST. The AST appeared to be in good condition, with no audible or olfactory evidence of a release. CEG also observed empty ASTs that formerly contained water or propane, as previously discussed in Section 5.3. No environmental concerns were noted associated with the empty ASTs at the Project.

The remaining manways and surface caps observed at the Project were for site services (i.e., domestic water, storm water, and sanitary sewer system).

Review of currently installed mechanical equipment and historical information concerning mechanical equipment, identified the use of alternate fuel sources (i.e., electric, natural gas), thereby eliminating the need for additional on-site fuel storage at the Project.

Based on the review of the state list of registered USTs, no USTs are registered for the Project.

Interviews with persons knowledgeable of the Project did not identify evidence of additional current or historic storage tanks (above or below ground) at the Project.

Visual observations did not identify surface markings indicating the existence of subsurface product pipelines at the Project.

ABOVEGROUND STORAGE TANK TABLE	
Tank Number	1 (registration not required)
Location	Eastern Project boundary in the vicinity of the cabin building
Construction Materials	Steel
Year Installed	Unknown
Tank Size/Capacity	Approximately 300 gallons

Contents	Propane
Use of Contents	Fuel source for cabin building furnace unit
Tank Status (Active, Inactive, Removed, Abandoned)	Active
Registered (Yes/No)	N/A
LUST List (Yes/No)	N/A

5.6 Surface Areas

The Project is serviced by a private potable well located northwest of the residential structure on the southeast portion of the property. According to the POC, the well was at one point used for irrigation and attached to the pumps and water tanks; however, once the camp house was brought onto the property in 2001, the well was converted to a potable drinking well.

Visual observations did not identify any evidence of on-site surface impoundment facilities, pits, dry wells, or dumping of apparent hazardous substances at the Project.

Visual observations did not identify any surface water features including lagoons, ponds or other bodies of water at the Project, other than the manmade pond in the southeastern portion of the Project. No staining or unusual odors were identified in the vicinity of the pond.

Visual observation of the Project and adjacent properties did not identify any evidence of distressed vegetation, staining, or surface migration of petroleum releases or hazardous materials onto or off the Project, with the exception of a patch of distressed vegetation in the vicinity of the derelict propane and water tanks and farming equipment. According to the POC, Round-up is utilized as vegetation control in these areas. No olfactory evidence of spills or releases was identified in this area. The observed condition of the vegetation does not appear to represent an environmental concern to the Project at this time.

A sinkhole is a natural depression or hole in surface topography caused by removal of soil and/or bedrock by water. Sinkholes have been used as disposal sites for various forms of waste, which can cause soil and groundwater contamination. Visual observations and review of historical topographic maps and aerial photographs did not identify evidence of sinkholes at the Project.

In addition, no evidence of mining or land filling was identified.

5.7 Asbestos-containing Materials (ACM)

Asbestos is a naturally-occurring mineral fiber that, because of its strength and heat resistance, has been used in a variety of building construction materials as a fire retardant and insulation. Asbestos-containing building materials are generally classified as friable or non-friable. Friable materials include materials that can be crumbled, pulverized, or reduced to powder by hand pressure, or by normal use or maintenance can be expected to emit asbestos fibers into the air. Non-friable materials are of particular concern when damaged by maintenance work, demolition, or other any other activity that renders the material friable.

Suspect non-friable ACM, in the form of roofing materials, vinyl floor tile, wallboard/joint compound, and various mastics, were identified. These materials were observed to be in good condition.

Additional suspect ACM may be present in inaccessible areas, including, but not limited to, wall cavities, ceiling cavities, concealed flooring, the interior of machinery or equipment, and/or sewer and water systems.

In accordance with the scope of work for this assessment, no samples were collected.

5.8 Radon Gas

Radon is a naturally occurring odorless and colorless gas that results from the decay of radioactive materials potentially present in soil and bedrock. Radon breaks down (decays) into solid radioactive elements called *radon progeny* (such as polonium-218, polonium-214, and lead-214). Radon progeny can attach to dust and other particles and can be breathed

into the lungs. As radon and radon progeny in the air break down, they give off alpha particles, a form of high-energy radiation that can damage the DNA inside the body's cells.

The USEPA guidance action level for annual exposure to radon in residential environments is 4 picoCuries per liter (pCi/L) of air. Private owners of commercial real estate are not subject to regulatory enforcement of this action level, but it is commonly used for comparison purposes to indicate whether further action at a building may be warranted.

Review of the USEPA's Radon Map for St. John the Baptist Parish, Louisiana indicated that the Project is located in Zone 3, areas with a predicted average indoor radon screening level less than 2 picoCuries per liter (pCi/L) of air.

Consequently, based on the Radon Zone in which the Project is located and based on the Scope of Work, radon sampling was not performed as a part of this assessment.

5.9 Lead-based Paint (LBP)

Lead affects the majority of systems within the body. At high levels it can cause convulsions, coma, and even death. Lower levels of lead can adversely affect the brain, central nervous system, blood cells, and kidneys.

Old lead-based paint is the most significant source of lead exposure in the U.S. today. Most homes built before 1960 contain heavily leaded paint. Some homes built as recently as 1978 may also contain lead paint. This paint could be on window frames, walls, the outside of homes, or other surfaces. Harmful exposures to lead can be created when lead-based paint is improperly removed from surfaces by dry scraping, sanding, or open-flame burning.

In 1978, lead-based paint (LBP) was banned for residential use by the USEPA through the United States Department of Housing and Urban Development (HUD). However, the term LBP is applicable only to residential applications, and does not apply to commercial construction applications.

The oldest buildings at the Project were originally constructed in the early 1980s. Generally, due to the date of construction (post-1977), the potential use of LBP was minimized due to regulatory requirements and sound business practice. Based on the date of construction, no suspect LBP was observed, and no samples were collected.

5.10 Lead in Drinking Water

Lead is rarely found in source water, but enters tap water through corrosion of plumbing materials. Homes built before 1986 are more likely to have lead pipes, fixtures and solder. The most common problem is with brass or chrome-plated brass faucets and fixtures which can leach significant amounts of lead into the water, especially hot water. Health concerns regarding lead in water are the same as they are for lead in paint.

Potable water is provided to the Project from a private water production well located in the southeast portion of the Project. Sample data to determine the quality of water and/or presence of contaminants was not provided. Based on the date of construction of the buildings (early 1980s), lead drinking water piping, lead solder, and/or flux on copper drinking water piping may be present. In accordance with the scope of work for this assessment, no samples were collected.

5.11 Mold

CEG performed a limited visual assessment for the presence of mold, conditions conducive to mold, and evidence of moisture in readily accessible interior areas of the Project. As this is a non-scope item CEG is not liable for opinions expressed, or the omission of opinions expressed with regards to mold.

No suspect mold or water damage was observed.

This assessment does not constitute a comprehensive mold survey of the Project. The reported observations and conclusions are based solely on interviews with Project personnel and conditions as observed in readily accessible interior areas of the Project on the assessment date.

5.12 Threatened & Endangered Species

Threatened and endangered species have been identified in Louisiana. CEG did not note obvious visual indications of the presence of threatened and endangered species at the Project. CEG did not identify any of the listed United States Fish & Wildlife threatened or endangered species on or adjacent to the Project.

This assessment does not constitute a comprehensive survey of the Project. The reported observations and conclusions are based solely on conditions as observed at the Project, on the assessment date, by CEG. A field biologist experienced in species identification would be required for a definitive determination regarding the presence of threatened and/or endangered species.

A copy of the USFWS Threatened and Endangered Species list for Louisiana is appended.

6.0 ADJACENT PROPERTIES

The general vicinity of the Project consists of agricultural land, industrial facilities, commercial retail facilities, and the Port of South Louisiana Executive Regional Airport.

DIRECTION FROM SITE	COMMENTS
North	Agricultural land
South	Reserve Truck Stop & Casino (4450 West Airline Highway) and West Airline Highway followed by agricultural land to the south and southwest and Entergy (4317 West Airline Highway) to the southeast
East	Port of South Louisiana Executive Regional Airport (355 Airport Road)
West	Agricultural land

Based on observations and available regulatory information, the adjacent property uses are not anticipated to adversely impact the environmental integrity of the Project. The east, southeast, and south adjoining facilities were identified on numerous environmental databases, which are further discussed in the Regulatory Database Review, Section 4.0.

7.0 FINDINGS, CONCLUSIONS, & RECOMMENDATIONS

7.1 Findings/Conclusions

This assessment has revealed no evidence of Recognized Environmental Conditions (RECs), Historical RECs (HRECs), or Controlled RECs (CRECs) in connection with the Project.

However, the following item of environmental note was identified:

Hazardous Materials / Petroleum Products Storage and Handling (Section 5.2)

- Numerous flammable materials are used and stored at the Project, including gasoline, various automotive maintenance fluids, various agricultural fluids, and various maintenance materials, such as paint. The materials observed do not appear to pose a hazard to the Project, provided they are used as designed, are properly handled, and all regulations regarding their use are followed. Although no indication of a significant release of hazardous materials or petroleum products was observed during CEG's site visit, the flammable materials observed were not found to be stored within a flammable materials cabinet.

7.2 Recommendations

The following actions are recommended:

- Flammable materials should be properly stored within flammable materials cabinets.

8.0 DECLARATION

I, Amanda Leitzman Roman, declare that to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312; and I have the specific qualifications based on education, training and experience to assess a site of the nature, history, and setting of the site. I have developed and performed the All Appropriate Inquiries conformance with the standards and practices set forth in 40 CFR Part 312.

Amanda Leitzman Roman - Executive Vice President

FIELD SKETCH

Appendix A – Field Sketch