

**PHASE I ENVIRONMENTAL
SITE ASSESSMENT REPORT**

**MILLHAVEN PLANTATION, LLC
MILLHAVEN PLANTATION
HIGHWAY 594 AND HUENEFELD
ROAD
MONROE, LOUISIANA**

PPM PROJECT NO. 150401-ESA1

SEPTEMBER 29, 2011

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT

AT

MILLHAVEN PLANTATION
HIGHWAY 594 AND HUENEFELD ROAD
MONROE, LOUISIANA

PREPARED FOR:

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PPM PROJECT NO. 150401-ESA1

SEPTEMBER 29, 2011

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TABLE OF CONTENTS

	<u>PAGE</u>
EXECUTIVE SUMMARY	iv
1.0 INTRODUCTION.....	1
1.1 Purpose	1
1.2 Detailed Scope of Services	2
1.2.1 Records Review	2
1.2.2 Site Reconnaissance.....	3
1.2.3 Interviews	3
1.2.4 Level of Inquiry	3
1.3 Significant Assumptions	4
1.4 Scope Limitations	5
1.5 Special Terms and Conditions.....	5
1.6 User Reliance	6
1.7 PPM Acknowledgement Statement	6
2.0 SITE DESCRIPTION.....	7
2.1 Location and Legal Description	7
2.2 Site and Vicinity General Characteristics.....	7
2.3 Site Use and Improvements	7
2.4 Current Uses of Adjoining Properties	8
3.0 USER PROVIDED INFORMATION	12
3.1 Title Records	12
3.2 Environmental Liens or Activity and Use Limitations	12
3.3 Specialized Knowledge	12
3.4 Valuation Reduction for Environmental Issues	12
3.5 Owner Information	13
3.6 Reason for Performing Phase I	13
3.7 Other Information Provided by User	13
4.0 RECORDS REVIEW	13
4.1 Standard Environmental Record Sources	13
4.2 Additional Environmental Record Sources	14
4.2.1 Additional Environmental Database Sources	14
4.2.2 Other Environmental Records/Sources	14

TABLE OF CONTENTS (continued)

	<u>PAGE</u>
4.3 Physical Setting Sources	17
4.4 Historical Use Information	17
5.0 SITE RECONNAISSANCE	20
5.1 Methodology and Limiting Conditions.....	20
5.2 Area Reconnaissance	21
5.3 Exterior Observations	21
5.4 Interior Observations	23
6.0 INTERVIEWS	23
6.1 Interview with Owner(s)/Previous Owner(s)	23
6.2 Interview with Site Manager(s)/Previous Site Manager(s)	24
6.3 Interview with Occupant(s)	24
6.4 Interview with Local Government Officials.....	25
6.5 Interview with Others	26
7.0 FINDINGS/OPINIONS	27
8.0 CONCLUSIONS	32
9.0 ADDITIONAL SERVICES	35
10.0 COMMONLY USED ABBREVIATIONS	36

FIGURES (Appendix A)

- Figure 1 – Site Location Map
- Figure 2 – Site/Area Map

APPENDICES

- Appendix A – Figures
- Appendix B – Site Photographs
- Appendix C – Regulatory Research Documentation
- Appendix D – Historical Records Documentation
- Appendix E – Other Documentation
- Appendix F – Qualifications of Environmental Professionals

EXECUTIVE SUMMARY

PPM Consultants, Inc. was retained by Millhaven Plantation, LLC to conduct a Phase I Environmental Site Assessment (ESA) of the Millhaven Plantation located at Highway 594 and Huenefeld Road in Monroe, Louisiana. The purpose of this assessment was to identify recognized environmental conditions in connection with the property by means of interviews, review of record information, and site reconnaissance. The environmental assessment was conducted in conformance with the scope of American Society for Testing and Materials (ASTM) Standard Practice E 1527-05.

PPM conducted the site reconnaissance on August 26, 2011. The subject property is agricultural in nature. The property is irregular in shape and encompasses approximately 725 acres. Structural improvements on site include one open sided metal roofed farm shop and a shed, four diesel powered well pumps each with a 500-gallon above ground storage tank (AST), four electric well pumps, and three ASTs near the farm shop. The property is located north of Interstate 20 (I-20) in an agricultural, residential, and commercial area of eastern Ouachita Parish. Available historical resources indicate that the subject property has been agricultural in nature since at least 1941.

This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following:

- **Diesel Well Pumps and ASTs** Four diesel powered well pumps and four single-walled, 500-gallon ASTs formerly containing diesel fuel are located across the southern portion of the subject property. The tanks are empty most of the year. PPM did not observe evidence of leaks, stains, or hydrocarbon odor in the vicinity of the well pumps and tanks. By definition, ASTs located on the subject property represent recognized environmental conditions due to the material threat of future release; however, these tanks appeared to be relatively new and in good condition with no evidence of cracks, bulges, corrosion, or releases.
- **Diesel ASTs** PPM also observed one active 10,000-gallon diesel AST, one inactive 1,000-gallon diesel AST, and one inactive 500-gallon gasoline AST on the subject property in association with the farm shop to the northwest. By definition, ASTs located on a subject property represent recognized environmental conditions due to the material threat of future release. These tanks appeared to be in good condition with no evidence of cracks, bulges or corrosion. PPM did observe light staining was observed near the dispenser on the 10,000 gallon tank.
- **Farm Shop** Empty drums formerly containing fertilizers and herbicides were observed near the farm facility. PPM also observed a number of oil products including solvents, diesel exhaust fluid, lubricants and waste oil located near the farm shop. All of these products were stored under a roof. PPM also observed two empty water tanks used for spreading herbicides and

other agrichemicals. Because these products have likely been stored on and utilized on the subject property for many years, their continued presence on the property represents a recognized environmental condition.

- **EZ Mart No. 114** PPM initially observed EZ Mart No. 114 (338 Millhaven Road) during site reconnaissance. The facility was observed by as an operating active EZ Mart with a retail fuel facility and convenience store. The facility did not show up on the EDR report but was on the orphan list. PPM investigated files located on LDEQ EDMS related to EZ-Mart No. 114. The facility registered three USTs; one 10,000-gallon regular unleaded, one 10,000-gallon premium unleaded, and one 16,000-gallon diesel UST for 2010-2011.

Several spills have been reported and are documented on LDEQ EDMS. None of the releases have been from the USTs. According to the documents, one spill occurred on June 8, 2001 and occurred due to a mechanical failure of the transfer pump and/or oil water separator. Approximately 200 gallons of product were spilled and soil in the immediate area was impacted. Confirmation soil samples collected after the excavation of impacted soils as a result of the June 2001 release, revealed TPH-D concentrations in excess of the LDEQ's RECAP screening standard protective of groundwater. PPM was unable to obtain other documents related to this incident.

A second spill occurred on May 11, 2004, when a truck driver damaged a slave unit on his truck releasing product and resulted in a release that impacted soil in the immediate area around the unit. According to documents obtained from EDMS, a truck driver damaged a pump slave unit which resulted in a spill of product. Fluid was contained in a sump and removed via vacuum truck. An estimated 5 gallons of diesel were released to the surface, and approximately 5-20 gallons were spilled to the soil below the dispenser. The surface spillage was routed to an oil water separator, while some of the subsurface spillage was removed via absorbent pads. The report indicates that residual product lingered in the soil. The spill was a result of human error. PPM was unable to obtain other documents related to this incident.

An additional diesel spill was reported on November 29, 2005. According to the report, a fiberglass line was hit during drilling which caused approximately 300-gallons of diesel to be released. Soil in the immediate area was impacted. Light non-aqueous phase liquids were observed in two monitoring wells following a release which occurred in November 2005. Additional information regarding further investigations at the facility or remedial actions was not documented. PPM was unable to obtain documents describing releases from USTs. Site hydrology would prevent surface releases from impacting the subject property because surface water

flows south and southeast toward Bennett Bayou. Groundwater flow direction was not mentioned in the documents review by PPM.

Although the USTs at the site are monitored for leaks and registered through the state of Louisiana, and no UST leaks or releases have been reported, the proximity of EZ Mart No. 114 represents a recognized environmental condition.

- **Louisiana State Police Troop F** Louisiana State Police Troop F was identified as a RUST facility. According to information obtained from EDR Report and LDEQ EDMS, one 10,000-gallon diesel UST is located on site and used to power an emergency generator. Documents suggest that three tanks were present at one time; however, two have been removed. By definition, USTs located adjacent to the subject property represent recognized environmental conditions due to the material threat of a future release.
- **Former aircraft hangar and chemical mixing facility** A former aircraft hangar and chemical mixing facility were located on adjoining property to the northwest. This facility was built circa 1970 by Mr. Fred Huenefeld and removed in early 2011 by the current owners. According to interviews, all mixing took place on a concrete slab. Chemicals including pesticides, herbicides, fungicides and fertilizers were stored inside the building. Mr. Bruce Brooks, the most recent operator of the former airbase, indicated that only EPA certified chemicals and fertilizers were used.

According to interviews and from information gathered during site reconnaissance, approximately 10 feet of underground piping is located on adjoining property. PPM observed a dispenser coming out of the ground and confirmed that it was used to dispense Jet Fuel contained in ASTs on adjoining property.

However, based on the length of time that this facility was in operation and due to potential data gaps in both personal knowledge and publicly available documents, the former aircraft hangar and chemical mixing facility represent a recognized environmental condition.

- **Waste Connections, Inc.-White Oaks Landfill, Inc.** The orphan summary of the EDR report indicated the presence of a Type I/II and III landfill south of the subject property. PPM confirmed the existence of the active landfill operated by WCI-Inc. According to interviews and information obtained from LDEQ EDMS, the facility has permits to accept and process Type I wastes include (industrial wastes), Type II wastes (solid waste and household garbage), and type III wastes (construction and demolition debris). Documents show that 8 to 9 monitoring wells were installed at White Oaks Landfill in the summer of 2003, and that Type I/II landfill operations began in at the site in July 2003. The wells are sampled during

quarterly groundwater monitoring events. Constituents of concern include volatile organic compounds and 15 metals including arsenic and lead. Interviews with the site manager indicate that the facility does not handle hazardous waste in any form. The site manager revealed that the landfill is both clay and synthetic lined and that leachate ponds on the facility are lined as well. He advised that the facility does handle petroleum impacted soils and that they are stored in the Type I/II cells.

According to interviews, two ASTs on adjoining property to the south are owned by WCI-White Oaks Landfill. One 10,000-gallon tank contained water used for truck washing, while one other 10,000-gallon tank contained diesel fuel. A ditch and 10 foot high railroad berm are located between the ASTs and the subject property presenting two hydrologic barriers. It is likely that these barriers would prevent impacted stormwater runoff from impacting the subject property. However, by definition, ASTs located on adjoining property represent recognized environmental conditions due to the material threat of future release.

Although the facility's waste disposal units and water impoundments are lined with clay and plastic and the facility actively monitors for groundwater contamination per its groundwater monitoring plan, the presence of a landfill adjacent to the subject property, and the potential for ground water from the landfill negatively impacting the subject property represents a recognized environmental condition.

- **Delta Disposal** One 10,000-gallon diesel AST was located in the parking lot of Delta Disposal. According to interviews, two 250-gallon tanks stored waste oil and were located near the shop facility located at the Delta Disposal site. A ditch and 10 foot high railroad berm are located between the ASTs and the subject property presenting two hydrologic barriers. It is likely that these barriers would prevent product or impacted stormwater runoff originating from the Delta Disposal facility from impacting the subject property. However, by definition, ASTs located on adjoining property represent recognized environmental conditions due to the material threat of future release.

- **Browning Ferris Industries-White Oaks Landfill** PPM confirmed the existence of BFI-White Oaks Landfill. This facility was closed and sealed and is undergoing a 30 year long monitoring program. Although the facility was permitted by the State of Louisiana to accept non-hazardous waste, and actively monitors for groundwater contamination per its groundwater monitoring plan, the site, by its nature and its proximity to the subject property, represents a recognized environmental condition.

1.0 INTRODUCTION

1.1 PURPOSE

PPM Consultants, Inc. was retained by the Millhaven Plantation, LLC to conduct a Phase I Environmental Site Assessment (ESA) of the Millhaven Plantation located near the intersection of Highway 594 and Huenefeld Road in east Ouachita Parish, Louisiana. The purpose of this assessment was to determine if recognized environmental conditions were present at the site according to the American Society for Testing and Materials (ASTM) E 1527-05 Standard Practice for Environmental Site Assessment: Phase I Environmental Site Assessment Process. The purpose of the ASTM standard practice is:

“to define good commercial and customary practice...for conducting an environmental site assessment of a parcel of real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products.”

The goal of the processes established by this practice is to identify recognized environmental conditions associated with the property. The term *recognized environmental condition* is defined by ASTM as:

“the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.”

In order to qualify for one of the Landowner Liability Protections (LLP) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001, the User must provide the following information (if available) to the environmental professional (i.e., PPM) as specified in 40 CFR 312.25 through 31:

- 1) Environmental cleanup liens that are filed or recorded against the site;
- 2) Activity and land use limitations that are in place on the site or that have been filed or recorded in a registry;
- 3) Specialized knowledge or experience of the person seeking to qualify for the LLP;
- 4) Relationship of the purchase price to the fair market value of the property if it were not contaminated;

- 5) Commonly known or reasonably ascertainable information about the property; and
- 6) The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation.

Failure to provide this information could result in a determination that “all appropriate inquiry” is not complete. If there is more than one User of this report (e.g. lending institution or borrower/purchaser), a representative of each User must provide this information to seek qualification for the LLP. This and other information provided by the User is presented in **Section 3.0, User Provided Information**.

1.2 DETAILED SCOPE OF SERVICES

The ESA was conducted in accordance with good commercial and customary practices as described in ASTM Designation: E 1527-05, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.” A summary of the scope of work completed is presented in the following sections.

1.2.1 Records Review

PPM reviewed reasonably ascertainable records to establish a history of the site and surrounding properties within the approximate minimum search distances described in ASTM E 1527-05, to include:

- Federal records and databases, including the National Priority List (NPL), Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS), Resource Conservation Recovery Act (RCRA) Generators and Treatment, Storage, and Disposal (TSD) facilities lists, and Emergency Response Notifications System (ERNS) list;
- State and local records, including lists of hazardous waste sites identified for investigation or remediation; solid waste disposal sites; registered and leaking underground storage tank (LUST) lists; and other documents as are reasonably ascertainable;
- Previous environmental site assessment reports, tank closure reports, subsurface investigation reports, corrective action reports, audit reports, and related Federal and state correspondence provided by client or property owner;
- On-site records related to environmental compliance and hazardous substance and petroleum product usage, storage, inventories, handling, and disposal;
- Standard historical sources, which may include aerial photographs, fire insurance maps, and city directories; and

- Physical setting sources, including United States Geological Survey (USGS) Maps, Soil Conservation Service Maps, and other information as available.

1.2.2 Site Reconnaissance

A site reconnaissance was conducted on the property to determine the nature and setting of the site and to visually and/or physically observe the property and any structures on the property to the extent not obstructed by bodies of water, adjacent buildings, or other obstacles. The indoor and outdoor inspections focused on practices that may constitute or contribute to recognized environmental conditions. PPM investigated the following during the site reconnaissance:

- Uses of the site, adjoining properties and surrounding area (past and present).
- Geological, hydrogeological, hydrologic, and topographic conditions.
- Presence of storage tanks; potential PCB-containing equipment; odors; pools of liquid; containers, use, and handling practices of hazardous substances and petroleum products; pits, ponds, and lagoons; stained soil and pavement; stressed vegetation; solid waste disposal; waste water discharge; wells; septic tanks; drains and sumps; stains or corrosion; and heating/cooling system. If any of these items were identified, PPM attempted to determine the nature and potential environmental concern represented by the item through observation, interviews, and record review.

1.2.3 Interviews

PPM made reasonable attempts to obtain information regarding the site by conducting interviews with the following as deemed appropriate:

- User of report;
- Key site manager or site escort, if different;
- Current and past owners, occupants, and tenants;
- Current and past employees;
- State and local environmental, health and emergency response agencies;
- Local Fire Department; and
- Local municipal engineers.

1.2.4 Level of Inquiry

As provided in the ASTM E 1527-05 standard practice, performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with the property. The practice recognizes reasonable limits of time and cost. Although reasonable cost is not defined, reasonable

time is defined as information that can be provided by the source within 20 calendar days of receiving the request by the information provider. If such information was requested and the report was requested by the user in less than 20 calendar days, PPM will issue an addendum to the report upon receipt.

PPM made reasonable attempts to review locally available records and supplement records that are not locally available with telephone interviews, when applicable. If a known or suspected environmental concern was identified on the federal and state databases, PPM made use of the physical setting information, statistical plume studies, local records, and interviews with state and local agencies to provide our opinion of the impact on the property. In situations where such issues could not be brought to closure by these means, the access and review of state or federal case files by either traveling to the state capital or by requesting the information by mail through the Freedom of Information Act was considered a change in scope.

The ASTM standard practice specifies that all obvious uses of the property be identified from the present back to the property's first developed use, or back to 1940, whichever is earlier. The standard practice also specifies a search interval of standard historical resources of approximately five years. It has been PPM's experience that the standard historical resources most likely to provide usable information on historical use are aerial photographs, local street directories, and fire insurance maps; however, the quality, coverage, and local availability of these resources may be highly variable. If local research of these resources did not attain the ASTM objectives, PPM attempted to supplement this information with interviews and by ordering aerial photographs and Sanborn Fire Insurance maps from a national vendor that specializes in the retrieval of such information. Historical information derived from checking these sources was deemed sufficient to comply with the practice, unless additional research was specifically requested by the client.

One of the User's responsibilities specified by the ASTM standard practice is the checking of land title records for environmental liens and land use limitations. Performance of this responsibility is at the discretion of the User; however, it is typical for title records to be researched prior to purchase of a property. Land title records are also a standard historical resource. If land title records were obtained by the client, PPM requested this information be provided to supplement the historical research. PPM did not conduct a land title search unless specifically requested by the client.

1.3 SIGNIFICANT ASSUMPTIONS

A statistical study of petroleum hydrocarbon plume lengths originating from underground storage tank (UST) releases was performed by the Texas Bureau of Economic Geology, Geological Circular No. 97-1. The Texas study found that groundwater benzene plumes [defined as 10 parts per billion (ppb) benzene] were less than 380 feet in length in 90 percent of the sites studied and less than 1,200 feet in length in 99 percent of the sites studied. Based on this study, LUST sites identified within the search area (see **Section 4.1, Standard Environmental Record Sources**) that were greater than 1,000 feet from the property were assumed to have a minimal potential to impact the property unless PPM had specialized knowledge to the contrary. Likewise, LUST sites between 500 and 1,000 feet

from the property that could reasonably be interpreted to be hydrologically down or cross-gradient were also assumed to have a minimal potential to impact the property unless PPM had specialized knowledge to the contrary. LUST sites less than 500 feet from the property were evaluated on a case-by-case basis.

In the absence of area-specific information such as PPM's specialized knowledge or groundwater data obtained from document review, PPM assumes that the groundwater flow direction in the area of the property mimics the topographical gradient indicated by USGS Topographic Maps discussed in **Section 4.3, Physical Setting Sources** and will use this implied groundwater flow direction in the evaluation of potential impacts from offsite sources.

Another factor used in considering the potential impact from petroleum hydrocarbon plumes was the presence of intervening hydrologic barriers such as perennial streams, rivers, and lakes. If such a feature was present between an identified petroleum hydrocarbon release and the property, the release was assumed to have a minimal potential to impact the property.

1.4 SCOPE LIMITATIONS

The scope limitations identified below would be considered data gaps; however, a data gap is only significant if other information and/or professional experience are unable to supplement the missing information in such a way that reasonable opinions can still be made with regard to recognized environmental conditions. The significance of data gaps and how they affected PPM's ability to make reasonable conclusions are discussed in **Section 7.0, Findings/Opinions**.

Scope limitations encountered during this assessment included:

- Information was not readily available concerning some RCRA facilities from USEPA ECHO website;
- Previous owners were not available for interviews;
- The small scale of older historical aerial photographs limited PPM's ability to discern fine details in the determination of land use;
- Data failure in determining site history back to 1940 or first development due to the following:
 - The oldest aerial photograph available from local sources was 1941;
 - The oldest city directory listing available from local sources was 2000; and
 - No coverage of area for Sanborn maps.

1.5 SPECIAL TERMS AND CONDITIONS

The User did not request or specify any special terms or conditions that would limit or reduce the scope of this assessment with respect to the ASTM E 1527-05 practice.

There may be environmental issues or conditions at a property that parties may wish to assess in connection with commercial real estate that are outside the scope of the ASTM E 1527-05 practice. Non-scope considerations include (but are not limited to) asbestos, lead paint, wetlands, or radon. Non-scope considerations were not included in this assessment unless specifically requested by the User. If such non-scope considerations were not addressed by this assessment, no implication is intended as the relative importance of their absence. If any non-scope considerations were addressed by this assessment, they are identified and discussed in **Section 9.0, Additional Services** of this report.

1.6 USER RELIANCE

The Primary User of this Phase I ESA report is Millhaven Plantation, LLC. The findings and conclusions contained within this report may not be used or relied upon by any other parties without the written consent of Millhaven Plantation, LLC.

In accordance with the ASTM E 1527-05 practice, this report may be relied upon by the Primary and Secondary User for a period of up to 180 days until the date of acquisition. If the property is not acquired before 180 days, the following components of the report must be updated:

- Interviews with owners, operators, and occupants;
- Searches for environmental cleanup liens;
- Reviews of federal, tribal, state, and local government records; and
- Visual inspections of the property and of adjoining properties.

If a party different from the original User intends to use this report, the subsequent User must also satisfy the following requirements at a minimum:

- Obtain written authorization to rely on the original report from the original User and PPM.
- Fulfill the User's Responsibilities outlined in **Section 1.1**.
- Contract PPM to update the report if the original report is over 180 days and less than one year old.

If the report is greater than one year old at the time of acquisition by any User, no part of the report can be relied upon in order to satisfy all appropriate inquiry.

1.7 PPM ACKNOWLEDGEMENT STATEMENT

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

2.0 SITE DESCRIPTION

2.1 LOCATION AND LEGAL DESCRIPTION

Street Address:	Near the intersection of Highway 594 and Huenefeld Road		
Parish:	Ouachita Parish		
City, State, Zip Code:	Monroe, Louisiana 71201		
Was a Legal Description Provided?	Yes (see Appendix E, Other Documentation)		
Source of Legal Description:	Millhaven Plantation, LLC		
Reference Map:	Figure 1, Site Location Map, Appendix A		

2.2 SITE AND VICINITY GENERAL CHARACTERISTICS

General Land Use:	Agricultural				
General Setting:	Agricultural, residential, and commercial				
General Topography:	Relatively flat				
USGS 7.5 Quadrangle:	Section:	5, 29, 32	Township:	17, 18 N	Range: 5 E
	Name:	Swartz, Louisiana			Date: 1994
Coordinates:	Latitude:	32° 30' 12" N		Longitude:	91° 59' 05" W
Nearest Major Thoroughfare:	Name:	Louisiana Highway 594			
	Distance:	Adjoining			
	Direction:	West			

2.3 SITE USE AND IMPROVEMENTS

Date of Site Visit:	August 26, 2011
Current use of property:	
Currently, the subject property is used exclusively for agricultural purposes. A farm shop and equipment parking is located on the subject property in the northwest corner. Vehicle and tractor fueling takes place near the farm shop as does light maintenance and equipment repair.	

Property Size:	Approximately 725 acres	Shape:	Irregular polygon
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Describe buildings on site:	
One open sided structure is located on the subject property. The building's supports are made of steel and the roof is metal as well.	

Describe vegetation and landscaping on site:	
Vegetation is limited to crop plants during planting and growing seasons, scrub grasses and weeds between these seasons, and hedgerow species along the southern and eastern edge. A pecan grove is located near the southwest corner of the property, and hydric vegetation is associated with flume ditches found running the length of the property from north to south, and east to west adjoining the railroad tracks.	

Describe roads, paths, paved areas on site:	
Roads and path ways are limited to gravel near the access point to the property of Huenefeld road, a small paved drive associated with the pecan grove, and dirt turn rows found through the fields splits sections of the property and parallel some of the ditches. In the northwest corner, there is a partially paved runway originating on adjoining property and running south onto the subject property.	

Type of Sewage Disposal:	None
Source of Drinking Water:	City
Type of HVAC System:	None

Adjoining Roads:	
North:	Huenefeld Road
East:	Sincere Street
South:	Meadowlark Drive
West:	Louisiana Highway 594

Reference Map:	Figure 2, Site/Area Map, Appendix A
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Reference Photographs:	Site Photographs, Appendix B
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2.4 CURRENT USES OF ADJOINING PROPERTIES

From Due North, then Clockwise:	
Name:	Farmland
Address:	Huenefeld Road
Use:	Agriculture
Direction:	North
Intervening Street:	Huenefeld road

Name:	King Solomon Missionary Baptist Church
Address:	346 Huenefeld Road
Use:	Church
Direction:	Northeast
Intervening Street:	None

Name:	Cottonland Village Apartments
Address:	343 Huenefeld Road
Use:	Residential
Direction:	Northeast
Intervening Street:	Huenefeld Road

Name:	Elmwood Apartments
Address:	372 Huenefeld Road
Use:	Residential
Direction:	Northeast
Intervening Street:	None

Name:	Multiple residences
Address:	Multiple Sincere Street addresses
Use:	Residential
Direction:	Northeast
Intervening Street:	None

Name:	Louisiana Land and Water Company
Address:	End of Sincere Road, adjoining Cottonland Trailer Park
Use:	Sewage treatment plant
Direction:	East
Intervening Street:	None

Name:	Farmland
Address:	None
Use:	Agricultural
Direction:	East
Intervening Street:	None

Name:	Vacant
Address:	None
Use:	Vacant, undeveloped land
Direction:	Southeast
Intervening Street:	None

Name:	Kansas City Southern Railroad
Address:	None
Use:	Railroad
Direction:	South
Intervening Street:	None

Name:	WCI-White Oaks Landfill
Address:	632 Meadowlark Drive
Use:	Refuse disposal
Direction:	South-southeast
Intervening Street:	Meadowlark Drive

Name:	Cell Tower
Address:	107 Meadowlark Drive
Use:	Relay tower for transmission of cellular phone signals
Direction:	South
Intervening Street:	Meadowlark Drive

Name:	Cell Tower
Address:	522 Meadowlark Drive
Use:	Relay tower for transmission of cellular phone signals
Direction:	South
Intervening Street:	Meadowlark Drive

Name:	United Automobile Workers Local 1977
Address:	107 Meadowlark Drive
Use:	Meeting place
Direction:	South
Intervening Street:	Meadowlark Drive

Name:	E-Z Mart
Address:	338 Millhaven Road
Use:	Retail fuel station
Direction:	Southwest
Intervening Street:	Meadowlark Drive

Name:	GuideCo Plant
Address:	11000 Millhaven Road
Use:	Former General Motors plant
Direction:	Southwest
Intervening Street:	Millhaven Road and Louisiana Highway 594

Name:	Mojo Outdoors
Address:	623 Highway 594
Use:	Commercial
Direction:	West
Intervening Street:	Louisiana Highway 594

Name:	Ouachita Parish High School
Address:	681 Highway 594
Use:	School
Direction:	West
Intervening Street:	Louisiana Highway 594

Name:	Residence
Address:	700 Highway 594
Use:	Residential
Direction:	West
Intervening Street:	Louisiana Highway 594

Name:	Vacant
Address:	800-900 Highway 594
Use:	Vacant, unimproved farmland
Direction:	West
Intervening Street:	Louisiana Highway 594

Name:	Louisiana State Police Troop F
Address:	1240 Highway 594
Use:	Police Station
Direction:	Northwest
Intervening Street:	Huenefeld Road

Reference Map:	Figure 2 , Site/Area Map, Appendix A
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Reference Photographs:	Site Photographs, Appendix B
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3.0 USER PROVIDED INFORMATION

3.1 TITLE RECORDS

Did the User provide title records for the property?	No
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3.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS

Is the User aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state, or local law?	No
Is the User aware of any AULs, such as engineering controls, land use restrictions, or institutional controls that are in place at the site and/or have been filed or recorded under federal, tribal, state, or local law?	No

3.3 SPECIALIZED KNOWLEDGE

Does the User have any specialized knowledge or experience related to the property or nearby properties? For example, is the User involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?	No
Is the User aware of any commonly known or reasonably ascertainable information about the property that would help PPM identify conditions indicative of releases or threatened releases?	Yes
a. Does the User know the past uses of the property?	Yes
b. Does the User know of specific chemicals that are present or once were present at the property?	No
c. Does the User know of any spills or other chemical releases that have taken place at the property?	No
d. Does the User know of environmental cleanups that have taken place at the property?	No
Based on the User's knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property?	No

3.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

Does the User believe the purchase price for this property reasonably reflects the fair market value of the property?	Yes
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3.5 OWNER INFORMATION

Property Owner:	Millhaven Plantation, LLC
Owner Representative:	Mr. Frederick Huenefeld
Address:	P.O. Box 2303 Monroe, Louisiana 71207
Telephone Number:	318-348-2733 (cell)

3.6 REASON FOR PERFORMING PHASE I

Reason for Phase I:	Louisiana Economic Development Site Certification
Type of Transaction:	None stated
Special Instructions:	Harvesting corn; will be completed by August 21

3.7 OTHER INFORMATION PROVIDED BY USER

The user provided PPM several survey plats depicting the property boundaries, as well as a copy of an Exchange Deed from George B. Franklin & Sons, Inc. and CWI White Oaks Landfill, LLC, and a copy of a preliminary wetlands assessment conducted on the property in August 2011.

4.0 RECORDS REVIEW

4.1 STANDARD ENVIRONMENTAL RECORD SOURCES

Standard environmental record resources were researched by obtaining regulatory databases from a national vendor that specializes in the retrieval of such information. The regulatory database report is provided in **Appendix C, Regulatory Research Documentation**.

Type of Site	Search Distance	Number Identified	
		Potential	Actual
NPL	1 mile	0	0
NPL Delisted Sites	0.5 mile	0	0
CERCLIS	0.5 mile	0	0
CERLCIS-NFRAP	0.5 mile	0	0
RCRA CORRACTS	1 mile	0	0
RCRA TSD	0.5 mile	0	0
RCRA Generator	On or Adjoining	0	1
ERNS	On site	0	0
State/Tribal Equivalent NPL	1 mile	0	0
State/Tribal Equivalent CERCLIS	0.5 mile	0	0
State/Tribal Landfill/SWD	0.5 mile	0	1
State/Tribal LUST	0.5 mile	0	0
State/Tribal RUST	On or Adjoining	0	2
Institutional/Engineering Control	On site	0	0

Voluntary Cleanup Sites	0.5 mile	0	0
Brownfields Sites	0.5 mile	0	0
Database Provider:	Environmental Data Resources, see Appendix C		

There were fourteen registered underground storage tank (RUST) facilities identified in the orphan summary of the environmental database report; due to the distance (more than 1,500 feet) between some of the RUST sites and the subject property, twelve have been dismissed from further discussion within this report. PPM verified that only two RUST facilities, Louisiana State Police Troop F, and EZ-Mart No. 114 located within 1,000 feet of the boundary of the subject property.

One LANDFILL facility, WCI-White Oaks Landfill was identified in the orphan summary of the database report; PPM verified that this facility was located on adjoining property south of Meadowlark Drive. The database provided recent operating permit information but no other data. PPM verified information in the EDR report with documents from the LDEQ EDMS.

There were seven RCRA-CESQG facilities identified in the orphan summary of the database report; one RCRA-CESQG identified in the orphan summary included the Louisiana State Police Troop F, which is located on adjoining property to the northwest across Huenefeld Road. PPM verified that the remaining six RCRA CESQG facilities were located greater than 500 feet from the subject property. Due to the distance between these facilities and the subject property, they have been dismissed from further discussion within this report.

4.2 ADDITIONAL ENVIRONMENTAL RECORD SOURCES

4.2.1 Additional Environmental Database Sources

Multiple other non-ASTM databases were reviewed to determine if facilities that may adversely affect the subject property were located in the area. However, the orphan summary indicated that none of the sites were

4.2.2 Other Environmental Records/Sources

Millhaven Plantation, LLC

Title:	Survey Plats-Millhaven Plantation	Source:	Mrs. Becky Harrod	Date:	July 2011
Survey plat of the subject property completed in summer 2011.					

Title:	Preliminary Wetlands Assessment-Millhaven Plantation	Source:	Mrs. Becky Harrod	Date:	August 21, 2011
Preliminary wetland investigation completed in August 2011. Results of the investigation suggest that there are no definitive wetlands located on site; however, the southern end of the north-south flume ditch may possess hydric plants, soils, and hydrology.					

GuideCo Plant

Title:	Phase I ESA	Source:	PPM, Inc.	Date:	2008
<p>A Phase I was conducted in 2008 to determine the current and historical recognized environmental conditions present at the facility. Nine historical recognized environmental conditions and 19 recognized environmental conditions were identified. A secondary investigation was conducted on several RECs.</p>					

Title:	Soil Remediation Plan	Source:	LDEQ-EDMS	Date:	January 2010
<p>This document indicates that a subsurface investigation was conducted at the site in September 2009. Analytical results collected during the investigation and a comparison of those results with RECAP Screening Standards was conducted. Since the impacted media at the site consisted of surface soil, the recommended remediation included excavation with confirmation sample collection and analysis for contaminants. Following the receipt of confirmation sample analysis that indicates that the impacted soil had been removed, the excavated areas can be filled and compacted.</p>					

Title:	Remedial Action Completion Report	Source:	LDEQ-EDMS	Date:	February 2010
<p>This document indicates that a subsurface investigation was conducted at the site in September 2009, and additional soil samples were collected from previous sample locations in November 2009 in an attempt to eliminate several areas from further investigation/remediation activities. Sample locations were chosen based on potential problem areas identified as recognized environmental conditions and historical recognized environmental conditions during a previous Phase I (completed in 2008). This document indicates that 600 tons of impacted soil was removed from the site during the remediation activities. The results of the analysis of the confirmation samples provide evidence that soil identified as impacted during the subsurface investigation has been removed from the site.</p>					

Title:	Certificate of Reuse (EPA and LDEQ)	Source:	LDEQ-EDMS	Date:	January 2011
<p>This document certifies that GuideCo Properties LLC, owner of the vacant GuideCo Plant located at 11000 Millhaven Road, has successfully conducted investigation (including the 2008 Phase I), remediation and risk management activities, and the environmental conditions at the property to a standard that is protective of human health and the environment based on its current and anticipated future use as a commercial and or industrial property.</p>					

EZ Mart No. 114

Title:	Leak Detector Testing- E-Z Mart No. 114	Source:	LDEQ-EDMS	Date:	December 2010
<p>Results of leak detector testing on tanks located on site. Report indicates that the leak detectors on site were working properly. Each tank was individually tested. The tanks include one 10,000-gallon regular unleaded, one 10,000-gallon premium unleaded, and the 16,000-gallon diesel tank.</p>					

Title:	UST Registration- E-Z Mart No.114	Source:	LDEQ-EDMS	Date:	June 2011
<p>Registration for three USTs at the site including the 10,000-gallon regular unleaded, the 10,000-gallon premium unleaded, and the 16,000-gallon diesel tank.</p>					

Title:	Waste Disposition Report	Source:	LDEQ-EDMS	Date:	June 2001
<p>Report indicating that a spill occurred after a pump failed on an oil-water separator. Fluid, including 221 gallons of diesel fuel was removed from the sump containing the pump and separator, while approximately 15 yards of impacted soil from an area 90 feet long by approximately 1 to 5 feet wide were removed and transported to a landfill.</p> <p>Following the excavation, another consultant collected four soil samples from the bottom of the excavation to document residual diesel concentrations in the top soil. Sampling was witnessed by the Louisiana Department of Environmental Quality. Total petroleum hydrocarbons as diesel (TPH-D) concentrations ranged from 4.4 mg/kg to 2,600 mg/kg. The report indicates that additional soil sampling will be conducted to determine the depth of TPH-D concentrations exceeding the LDEQ's Risk Evaluations/Corrective Action Plan program protective of groundwater. PPM was unable to locate an NFA letter regarding this incident.</p>					

Title:	Spill Report	Source:	LDEQ-EDMS	Date:	May 2004
<p>This document indicates that in May 2004 a truck driver damaged a pump slave unit which resulted in a spill of product. Fluid was contained in a sump and removed via vacuum truck. An estimated 5 gallons of diesel were released to the surface, and approximately 5-20 gallons were spilled to the soil below the dispenser. The surface spillage was routed to an oil water separator, while some of the subsurface spillage under the dispenser was removed via absorbent pads. The report indicates that residual product lingered in the soil. The spill was a result of human error.</p>					

Title:	Unauthorized Discharge Notification Report	Source:	LDEQ-EDMS	Date:	November 2005
<p>The reports states that JM American Canopies broke a diesel fuel line while drilling for canopy footing installation. The store failed to shut off pumps after being notified of damage. Someone removed barricades and pumped fuel causing approximately 300 gallons of diesel to leak from the UST piping. Perry and Sons responded for clean up and repair. Diesel was removed with a vac-truck and absorbent material for disposal. Impacted soil was also removed. The document indicated that the status of the investigation was "pending". No other information regarding this incident was available.</p>					

Louisiana State Police Troop F

Title:	UST Registration-LA State Police Troop F	Source:	LDEQ-EDMS	Date:	June 2011
<p>Registration of one 10,000-gallon diesel UST located approximately 500 feet from the subject property.</p>					

WCI-White Oaks Landfill

Title:	WCI-White Oaks Landfill Quarterly Groundwater Monitoring Report	Source:	LDEQ-EDMS	Date:	July 2011
<p>This report, completed by another consultant, indicates that no volatile organic compounds were detected in any of the monitoring wells. However, the report states that reportable levels of arsenic, barium, and zinc (3 of 15 metallic COCs) were detected in groundwater on the perimeter of the landfill facility. However, these levels were below screening standards defined by Louisiana RECAP standards for landfills. The water level elevations from eleven monitoring wells and three piezometers were used to construct the potentiometric map included in the report. Historically the inferred flow direction has been from the northwest to the east southeast, away from the subject property. As shown in the diagram, the typical east southeast groundwater flow direction was inferred for the east half of the facility. There was, however, an apparent trend towards the northwest (towards the subject property) for the west half of the facility. This trend appears seasonal as water levels in the northwest corners drop during the summer months and return to normal in the winter. The cause for the apparent draw down is unknown.</p>					

Closed BFI-White Oaks Landfill

Title:	BFI Landfill Closure Plan	Source:	LDEQ-EDMS	Date:	June 1994
Plan developed by BFI to close White Oaks Landfill in accordance with state regulations. The facility stopped receiving waste in October 1994 and has been involved with a 30 monitoring program and methane gas collection program.					

Louisiana Land and Water Company

Title:	Permit Application	Source:	LDEQ-EDMS	Date:	January 2006
This is a copy of a discharge permit application. The application includes information regarding the facility operation and technical details including direction of discharge, and volume of sewage treated per day. The application identified one outfall to a ditch located south of the ponds and requested an average discharge of 80,000 gallons of sanitary waste water per day. The discharge is to an unnamed ditch flowing along the boundary of the subject property and thence into Gourd Bayou south of the site.					

Title:	Discharge Monitoring Report	Source:	LDEQ-EDMS	Date:	February 2011
This document is the most recent discharge monitoring report for the LLWC facility. The facility is monitored for daily flow, and biological oxygen demand, fecal coliform, pH, total suspended solids once per month. No exceedances were reported.					

4.3 PHYSICAL SETTING SOURCES

LIST OF PHYSICAL SETTING SOURCES REVIEWED:					
Title:	Quadrangle Topographic Map	Source:	USGS	Date:	1984
Title:	USDA Soil Survey of Ouachita Parish	Source:	USDA	Date:	1974

Comments: The USGS topographic Map shows the property to have an approximate elevation between 64 and 71 feet above mean sea level (MSL) in an area that slopes gently southeast. The estimated depth to groundwater is between one and three feet below ground surface (BGS). The United States Department of Agriculture Soil Survey of Ouachita Parish indicated that soils beneath the site consist of Herbert Silt Loams or Herbert; Sterlington Silt Loam, Portland Silt Loam, Rill Silt Loam, and Perry Clay all of which are poorly drained.

4.4 HISTORICAL USE INFORMATION

AERIAL PHOTOGRAPHS:		
Year:	Comments:	
1941	Property:	The majority of the property contains agriculture fields. The northeast corner, the southwest corner, and a small area of the west central portion of the subject property appear wooded. An orchard is visible near a residential structure in the southwest corner of the site. Three roads or trails appear to transect the property from north to south.
	Adjoining:	Louisiana Highway 594 is visible adjoining the west side of the subject property, Huenefeld Road is visible to the north and a railroad track and adjoining road run parallel to the southern boundary of the subject property. Land to the north, east, and west appear agricultural in nature. Residences appear along Highway 594 on the southwest side of the subject property. Development appears adjoining the northwest corner of the property, as well as the northeast corner.

1951	Property:	The northeast corner, the southwest corner, and areas of the west central portion of the subject property are wooded; however, clearing of the southeastern corner of the property has occurred. Residential structures may be present on the eastern side of the subject property. The orchard is visible near the southwest corner. Three roads or trails appear to transect the property from north to south.
	Adjoining:	Louisiana Highway 594 is visible adjoining the west side of the subject property, Huenefeld Road is visible to the north and a railroad track and adjoining road run parallel to the southern boundary of the subject property. Land use appears similar to the 1941 photograph with residences appearing to the west and southwest of the subject property.
1967	Property:	The majority of the trees have been cleared on the subject property with the exception of the orchard near the southwest corner. Three roads or trails appear to transect the property from north to south, and residential structures are located along the east side of the property.
	Adjoining:	Adjoining properties appear residential or agricultural in nature. Land adjoining the subject property in the southeast corner is undeveloped. Development has occurred east of Highway 594.
1998	Property:	The subject property appears much like it does today. The entire property, except the southwest corner, and the northern area near the farm shop, has been improved for agricultural purposes. In the southwest, the pecan orchard is visible, and a stable is visible north of the orchard. The northwest corner of the subject property is still agricultural in nature, and the farm shop, an AST, and the runway are visible.
	Adjoining:	Substantial development has occurred on all sides of the subject property. To the northwest, the State Police barracks are visible across Huenefeld Road. Land to the east has been developed to include a number of apartment buildings and sewage retention ponds. Adjoining land along the eastern boundary and south of the sewer ponds appears agricultural in nature, but appears forested along the southeastern edge of the subject property. The railroad tracks are clearly visible along with Meadowlark Drive. A number of buildings are visible, and industrial development has occurred south of the railroad tracks intervened by Meadowlark Drive. A large pond is visible as well. The GuideCo facility and E-Z Mart convenience store are visible to the southwest of the site, while Ouachita High School and the Mojo Outdoors building can be seen to the west. Calvary Baptist Church and the Louisiana State Police Troop are visible as well.
2009	Property:	The subject property appears similar to before. No major changes to land use appear to have taken place on the subject site except for the removal of the stable buildings accompanying the pecan orchard located southwest.
	Adjoining:	Development south of the railroad tracks along the southern border of the property appears extensive. A number of buildings are visible, and industrial development has occurred south of Meadowlark Drive. A new apartment complex is located northeast of the subject property, north of Huenefeld Road, and three sewage ponds are located on the eastern boundary. One closed landfill facility (BFI-White Oaks Landfill) is visible, as well as WCI-White Oaks Landfill located east of the stormwater pond at the lower center of the image. The GuideCo facility and E-Z Mart convenience store are visible south of the site along Millhaven Road, along with Ouachita High School, and the Mojo Outdoors building to the west. The Louisiana State Police Troop building is visible as well.
Aerial Source:		Dates:
United States Geological Survey		1998
United States Department of Agriculture		1941,195,1967

Digital Globe	2009
Copies of aerials provided in Appendix D, Historical Records Documentation	

CITY DIRECTORIES:		
Source:		Ouachita Parish Genealogical Library (see Appendix D)
Year:	Comments:	
1940-1995	Property and Adjoining Property	Huenefeld Road, Millhaven Road, Meadowlark Drive, and Highway 594 were not included in Polk City Directories.
2000	Property:	The subject property was not listed.
	Adjoining:	Adjacent property listings consisted of the following: <ul style="list-style-type: none"> - Residential (140,166,343 Huenefeld Road) - Brooks Flying Service (206 Huenefeld Road) - King Solomon Baptist Church (346 Huenefeld Road) - E-Z Mart (338 Highway 594) - OPHS Baseball (621 Highway 594) - Three-I Industries (623 Highway 594) - Ouachita Parish High School (681 Highway 594) - Calvary Baptist Church (1155 Highway 594) - Louisiana State Police (1240 Highway 549) - GuideCo Corporation (11000 Millhaven Road) - United Auto Workers Local 1977 (170 Meadowlark Drive) - Cingular Wireless Tower (206 Meadowlark Drive) - Crane and Hoist Services Group (544 Meadowlark Drive) - Diesel Specialists Northwest (546 Meadowlark Drive) - CWI and White Oaks Landfill (588 Meadowlark Drive)
2005	Property:	The subject property was not listed.
	Adjoining:	Adjacent property listings consisted of the following: <ul style="list-style-type: none"> - Residential (140,166,343 Huenefeld Road) - King Solomon Baptist Church (346 Huenefeld Road) - E-Z Mart (338 Highway 594) - OPHS Baseball (621 Highway 594) - Three-I Industries (623 Highway 594) - Ouachita Parish High School (681 Highway 594) - Calvary Baptist Church (1155 Highway 594) - Bob's Texaco and Louisiana State Police (1240 Highway 549) - Trade Union (170 Meadowlark Drive) - Electric Data Systems Corporation, GuideCo Corporation, Inland Fisher Guide Division, United Auto Workers Local 1977 (11000 Millhaven Road)
2010	Property:	The subject property was not listed.
	Adjoining:	Adjacent property listings consisted of the following: <ul style="list-style-type: none"> - Residential (140,166,343 Huenefeld Road) - Brooks Flying Service (206 Huenefeld Road) - King Solomon Baptist Church (346 Huenefeld Road) - E-Z Mart (338 Highway 594) - Three-I Industries (623 Highway 594) - Ouachita Parish High School (681 Highway 594) - Calvary Baptist Church (1155 Highway 594) - Monroe Police Department and Louisiana State Police (1240 Highway 549) - Gorilla Axle (1289 Highway 594) - Hoist and Crane Service (544 Meadowlark Drive) - White Oaks Landfill (588 Meadowlark Drive)

		- GuideCo Properties, LLC, and Gray Construction Company (11000 Millhaven Road)
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SANBORN MAPS:

No coverage

USGS TOPOGRAPHIC MAPS:

Quadrangle Name: Swartz, Louisiana see **Figure 1, Appendix A**

Year:	Comments:	
1994	Property:	The subject property is bound by Huenefeld Road, Highway 594, and Meadowlark Drive. The landing strip is visible in the northwest corner. Two buildings are located on the subject property near the pecan orchard in the southwest corner. Four unimproved trails are located on the property as well. Topography indicates that the property drains to the southeast.
	Adjoining:	Louisiana State Police Troop F and the former hangar and mixing facility are located to the northwest, while Solomon Baptist Church and the sewage treatment ponds are visible to the northeast. The Southeast adjoining property is wooded. Approximately six structures are visible south of Meadowlark Drive. The GuideCo plant is visible to the southwest as well as Ouachita Parish High School to the west.
1982	Property:	The map only shows the northern half of the subject property. The subject property is bound by Huenefeld Road and Highway 594. The landing strip is visible in the northwest corner. Four unimproved trails are visible on the property as well. Topography indicates that the property drains to the southeast.
	Adjoining:	Louisiana State Police Troop F is not visible in this map. However, the former hangar and mixing facility are visible in the northwest, while Solomon Baptist Church is visible to the northeast. A sewage lagoon is shown on adjoining property to the west across Highway 594.
1969	Property:	This map only shows the extreme southern portion of the subject property. The pecan orchard and possibly two structures are indicated on the map. The eastern portion of the subject property appears wooded.
	Adjoining:	Adjoining property to the south does not appear developed. However, Illinois Central Railroad is shown adjoining the subject property and Gourd Bayou is visible as well.
1957	Property:	The 1957 map shows only the northern third of the subject property. A wooded portion is visible to the northeast near Solomon Baptist Church. One intermittent stream as well as two unimproved roads and three dwellings are shown as well.
	Adjoining:	Solomon Baptist Church is visible to the northeast. Five dwellings are located west of Highway 594.

5.0 SITE RECONNAISSANCE

5.1 METHODOLOGY AND LIMITING CONDITIONS

Were there any conditions limiting ability to perform the site inspection?	No
Was there any special methodology used to inspect the target property?	No
During the site visit, PPM visually and physically observed the property to the extent not obstructed by bodies of water or other obstacles.	
General Methodology used to Inspect Property:	
PPM conducted a site and area reconnaissance to verify data provided by EDR and to inspect the site and	

surrounding properties for conditions that might warrant environmental concern. Observations concerning sites identified by the regulatory database are presented in **Section 4.1**. Observations made of suspect activities in exterior areas on the subject property or on adjoining properties are presented in **Section 5.3, Exterior Observations**. Observations made of suspect activities in interior areas of the subject property are presented in **Section 5.4, Interior Observations**. Observations made of suspect activities for sites in the surrounding area that are not adjoining or were not identified by the regulatory database are presented in **Section 5.2, Area Reconnaissance**.

5.2 AREA RECONNAISSANCE

PPM conducted the area reconnaissance on August 26, 2011. The general area is agricultural; however, PPM did observe a large industrial facility to the southwest, as well as a landfill to the southeast. PPM noted one AST located on Meadowlark Drive, one UST site, E-Z Mart located south of the facility on Highway 594. PPM also observed two churches, two apartment complexes, a sewage retention pond, a State Police barracks and a former aircraft hangar and chemical mixing facility located northwest of the subject property. This had a history of aerial chemical application. There were no other obvious suspect activities in the surrounding area.

EDR provided a list of "Non-Geocoded Sites" located in the general site vicinity whose locations were not mapped due to partial or erroneous addresses. The Non-Geocoded Summary did not identify any sites that appeared to have a potential to be in the study area.

5.3 EXTERIOR OBSERVATIONS

Were the following conditions observed or suspected?		Onsite		Adjoining	
		Yes	No	Yes	No
1	Pits, Ponds, and Lagoons	X		X	
2	Stained Soil or Pavement	X		X	
3	Stressed Vegetation		X		X
4	Solid Waste	X		X	
5	Waste Water		X		X
6	Wells	X		X	
7	Septic Systems		X		X
8	Storage Tanks	X		X	
9	Drums	X			
10	Hazardous Substance Containers	X			X
11	Petroleum Product Containers	X			X
12	Unidentified Substance Containers		X		X
13	Odors		X		X
14	Pools of Liquid	X			X
15	Potential PCB Equipment		X	X	

Onsite Description: The subject property is a 725-acre tract of farmland east of Louisiana Highway 594, north of Meadowlark Drive, and South of Huenefeld Road in Ouachita Parish, Louisiana. There are two permanent structures on the subject property, one dilapidated wood frame shed and one open-sided storage/shop area. The fields are used to grow corn, soybean, and cotton.

1	One north-south flume ditch extends from the north side of the property to the southern end. This ditch was holding some water during the site visit. There was no sign of sheen or hydrocarbon odor near the ditch or the water.
2	PPM observed lightly stained dirt under the dispenser of the 10,000-gallon diesel tank near the farm shop.
4	Solid waste observed on the subject property included several empty plastic drums, plastic and wood and metal debris. The waste was associated with the farm shop in the northwest corner of the subject property.
6	PPM observed eight covered water wells on the subject property. Four were located along Highway 594 and the remaining four were located in the fields on the south portion of the property.
8	PPM observed seven ASTs on the subject property. Three of the ASTs are associated with the farm shop in the northwest corner of the subject property. Tanks include one active 10,000-gallon diesel tank, one empty 1,000-gallon diesel tank, and one empty 500-gallon gasoline tank. PPM

	<p>observed light staining in the soil below the dispenser on the 10,000-gallon tank. This staining was likely the result of tank over fill or a dripping dispenser nozzle. The tanks themselves appeared to be in good condition and did not show signs of leaks, bulges or corrosion.</p> <p>Four, 500-gallon diesel ASTs are located near portable well pumps located on the south side of the subject property. The tanks appeared empty at the time of the site visit. The tanks were not double-walled, but appeared to be in good condition and did not show signs of leaks, cracks, or bulges. No hydrocarbon odor was encountered around the tanks. Vegetation below and immediately around the tanks did not appear stressed beyond normal seasonal conditions, and soil below the tanks and the pump engines was not stained.</p> <p>Two trailer-mounted tanks used for spreading fertilizer, and three 300-gallon plastic totes containing Diesel Exhaust Fluid were contained under the shop roof.</p>
9	PPM observed approximately ten 30-gallon drums near the farm shop. All of the drums were empty and waiting for pick up by a disposal company. The drums formerly contained concentrated solutions of the herbicides Round-Up® and GramoxoneInteon® (Syngenta).
10	A number of potentially hazardous chemicals were observed and included the aforementioned herbicides, but also small volumes of solvents and cleaners used during the maintenance of the machinery and equipment stored at the farm shop.
11	Petroleum products included a container of used oil located in the farm shop as well as solvents and lubricants used during equipment and tractor maintenance.
14	Standing water was visible in the north to south plume ditch.
Off-Site Description: A full list of adjoining properties and their descriptions can be found in Section 2.4 of this report. Suspect activities on adjoining properties include: Louisiana Land and Water Company, Inc. sewage ponds to the east, the Delta Disposal facility, WCI-White Oaks Landfill, the closed BFI-Landfill and EZ Mart facility to the south, as well as GuideCo Plant to the southwest. The Louisiana State Police Troop F was also considered a suspect site.	
1	PPM observed a pond south of the subject property along the south side of Meadowlark Drive. PPM observed the entrance to the LWC sewage ponds located on adjoining property to the east.
2	PPM observed light staining under the 10,000 gallon diesel tank located at the Delta Disposal facility. The staining was likely the result of repeated tank overflow during refueling.
4	Solid waste was visible along the side of Meadowlark Drive associated with the White Oaks Landfill and the Delta Disposal facility. There were also fragments of metal and plastic located near the former hangar and chemical mixing facility.
6	PPM observed two covered water wells on adjoining property to the west along highway 594.
8	One 10,000-gallon tank was observed at the Delta Disposal facility located south of Meadowlark Drive. The tank contained diesel fuel and was used to fuel the company's fleet of garbage trucks.
15	PPM observed at least six pole-mounted transformers along Huenefeld Road, Meadowlark Drive and Highway 594.

ONSITE AST SYSTEM:				
Information:	Tank 1:	Tank 2:	Tank 3:	Tanks 4-7:
Unique Tank ID:	No. 1	No. 2	No. 3	No. 4-7
Active/Inactive:	Active	Inactive/Empty	Inactive/Empty	Seasonally active
Contents:	Diesel	Diesel	Gasoline	Diesel
Capacity (gal.):	10,000	1,000	500	500
Location:	Northwest corner of subject property	Northwest corner of subject property	Northwest corner of subject property	Near well pumps on southern half of property
Tank Construction:	Steel	Steel	Steel	Steel
Tank Age:	N/A	N/A	N/A	N/A
Underground Piping?	No	No	No	No

Piping Construction:	Steel	Steel	Steel	Steel
Pressurized or Suction:	Pressurized	None	None	Suction
Underground Length:	None	None	None	None
Hazard Labeling:	None	None	None	None
Traffic Protection:	None	None	None	None
Permanent/Temporary?	Permanent	Temporary	Temporary	Temporary
External Condition:	Good	Good	Good	Good
Secondary Containment?	No	No	No	No
Evidence of Release?	Yes	No	No	No
SPCC Plan?	No	No	No	No

5.4 INTERIOR OBSERVATIONS

Are there any interior spaces on the property?	No
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6.0 INTERVIEWS

6.1 INTERVIEW WITH OWNER(S)/PREVIOUS OWNER(S)

Interviewer:	Kody Chase		
Date(s):	August 26, 2011		
Name:	Mr. Frederick Huenefeld		
Affiliation:	Current owner Millhaven Plantation, LLC		
Title/Job:	Owner	Phone:	318-548-3939
Address:	P.O. Box 2303 Monroe, Louisiana 71207		
<p>Comments: Mr. Frederick Huenefeld is part owner of Millhaven Plantation, LLC He advised that he and his sister, Mrs. Becky Harrod, bought the 725-acre property in 1996 from their father Mr. Fred Huenefeld Sr. He advised that the land had been in his family for three generations, and was originally purchased in 1916 by his great grandfather Mr. Carl Frederick Huenefeld. He advised that the land has been used exclusively for agriculture purposes since the initial acquisition, aside from stable that existed near the pecan grove. He advised the stable was built around 1950, remodeled in the 1970s and 1990s, closed in 2000 and removed in 2006. He advised that there were no USTs or ASTs associated with the two stable buildings.</p> <p>Mr. Huenefeld advised that cotton, soybean, corn millet, and pecans have been grown on the property in the past. He advised that currently, the subject property was leased to Mr. Stanley Johnson, owner of Johnson Farms. According to Mr. Huenefeld, Mr. Johnson used the subject property to grow crops, and used the northwest corner as a staging area for farm equipment including tractors and implements, storage and mixing of agrichemicals including fertilizers, fungicides, and herbicides, and for light equipment repair and maintenance as well as vehicle fueling operations. Mr. Huenefeld told PPM that diesel fuel was stored in the 10,000-gallon AST on the north side of the subject property.</p> <p>Mr. Huenefeld advised that the concrete runway had not been used for approximately 5-6 years. He advised that Brooks Agricultural Services, Inc. (Brooks Flying Service, Inc.) used a former hangar facility and multiple ASTs formerly located near the hangar facility. He advised that chemical mixing occurred there as well. Mr. Huenefeld was not aware of any USTs on the subject property or on adjoining property. Mr. Huenefeld stated that there were approximately 10 feet of shallow, underground piping and a dispenser located near the former hangar.</p>			

Interviewer:	Kody Chase		
Date(s):	September 09, 2011		
Name:	Mr. Fred Huenefeld		
Affiliation:	Former owner of Millhaven Plantation		
Title/Job:	Former owner	Phone:	318-348-9767
Address:	Not stated		
<p>Comments: Mr. Fred Huenefeld took the management role of the plantation from his father circa 1951. From that time, he used the property to raise corn and cotton until he leased the subject property to Mr. Stanley Johnson around 1985. He advised that prior to his farming operation, his father also raised crops on the plantation as well. He advised that in 1996, he and his children initiated a deed transfer giving control of the property to his children. He opened Millhaven Flying Service on adjoining property around 1972 and leased the property to Bruce Brooks who in turn operated Brook's Flying Service on the adjoining property until 2006.</p> <p>Mr. Huenefeld told PPM that the irrigation wells located on the subject property were relatively new, having been dug sometime after 1996 when his son and daughter assumed ownership of the property. He also told PPM that he was not ware of any gas or oil wells on the property. Similarly, Mr. Huenefeld advised PPM that he was not aware of USTs on the property at any time in its history. Mr. Huenefeld did advise that there were several ASTs on the subject property associated with the farm shop. He was not aware of any environmental investigations or liens against the property or adjoining properties.</p>			

6.2 INTERVIEW WITH SITE MANAGER(S)/PREVIOUS SITE MANAGER(S)

Comments: Interviews with the site manager were not made by PPM because Millhaven Plantation, LLC does not manage the property.

6.3 INTERVIEW WITH OCCUPANT(S)

Interviewer:	Kody Chase		
Date(s):	August 26, 2011		
Name:	Mr. Stanley Johnson		
Affiliation:	Johnson Farms		
Title/Job:	Owner/operator	Phone:	318-801-0371
Address:	Not stated		
<p>Comments: Mr. Stanley Johnson advised PPM that he leases the subject property from Millhaven Plantation, LLC. He advised that he has been leasing and farming the land since at least 1982. He told PPM that over the years he has grown corn, soybean, and cotton on the subject property. He advised that Brook's Flying Service had operated near the subject property, but that the company has not operated for several years. He advised that a former hangar and ASTs were removed in spring 2011.</p> <p>Mr. Johnson told PPM that he was not aware of any current or former USTs on the subject property, or on the adjoining property, including near the former hangar. He advised that current chemical applications at the site include the use of EPA approved dry and liquid fertilizers including nitrogen and potash, and glycosphate-based herbicides are used on the fields. He told PPM that the chemicals were stored under a roof at the shop facility. He advised that he and his employees mix the chemicals with municipal water and apply it to the fields before planting and after harvesting.</p> <p>He told PPM that light tractor maintenance occurs under the roof of the farm shop building and that refueling activities also occur in the area immediately around the active 10,000-gallon diesel AST. He</p>			

advised that the 500-gallon AST and the 1,000-gallon AST near the 10,000-gallon AST on the subject property were empty but formerly contained gasoline and diesel, respectively. Mr. Johnson told PPM that there were eight wells on the subject property. He stated that four wells located along the highway were powered with electric pumps, while the others, spread across the fields were pumped with four diesel motors. He stated that four, 500-gallon diesel ASTs were used to power the well pumps during the growing season, and advised that the tanks sit empty until the irrigation is needed during planting and growing seasons.

Interviewer:	Kody Chase		
Date(s):	August 26, 2011		
Name:	Mr. Bruce Brooks		
Affiliation:	Brooks' Agriculture Service, Inc. (Brooks' Flying Service, Inc.)		
Title/Job:	Owner/operator	Phone:	318-801-0371
Address:	Not stated		
Comments: Mr. Brooks advised that he owned and operated an agricultural flying service that was headquartered on property he formerly leased from Millhaven Plantation, LLC. The property he leased is not part of the subject property, although the runway extends on to the subject property. He advised that he started the business in 1982 and ran the business until 2006. He advised that he offered aerial herbicide, fungicide, and pesticide application to farmers. Mr. Brooks told PPM that chemical mixing did occur on site, and that the chemicals were approved by the EPA. He stated that mixing occurred on a concrete slab under a roof and that he took every precaution to insure that no chemicals were released during storage and mixing. He advised that light aircraft repairs and maintenance occurred at the facility and fuel was stored in ASTs located on the exterior of the hangar and chemical building. He told PPM that he was not aware of any USTs on the property, but that approximately 10-12 feet of underground piping were used at the hangar facility to connect the fuel AST to the dispenser.			

6.4 INTERVIEW WITH LOCAL GOVERNMENT OFFICIALS

Interviewer:	Kody J. Chase		
Date(s):	September 9, 2011		
Name:	Mr. Mark Juneau		
Affiliation:	Louisiana Department of Environmental Quality		
Title/Job:	Environmental Specialist	Phone:	318-362-5445
Address:	Northeast Regional Office 1823 Hwy 546 West Monroe, Louisiana		
Comments: Mark Juneau has been involved with the LDEQ UST division for a number of years. He advised PPM that two of three USTs were removed by Perry and Sons from the Louisiana State Police Troop barracks sometime around 2002. He advised that the tanks pits were sampled and samples were free of constituents of concern.			
He advised that E-Z Mart No. 114 has never had a release from a UST, but he remembered that several spills had occurred on site, and were cleaned and remediated.			
Mr. Juneau was advised that the former BFI Landfill located west of White Oaks Landfill is involved in a 30 year monitoring program as required by LDEQ landfill closure procedures.			

6.5 INTERVIEW WITH OTHERS

Interviewer:	Kody J. Chase		
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Date(s):	September 8, 2011		
Name:	Mr. Danny Massey		
Affiliation:	Waste Connections of Louisiana, Inc.		
Title/Job:	District Manager	Phone:	318-537-2325
Address:	888 Meadowlark Drive Monroe, Louisiana 71202		
<p>Comments: Mr. Massey was interviewed during a phone conversation on September 8, 2011. He told PPM that he is the District Manager of Waste Connections of Louisiana, Inc. and that he oversees the operations at the White Oaks Landfill and Delta Disposals. Mr. Massey told PPM that the facility has a permit to accept and process Type I wastes (industrial wastes), Type II wastes (solid waste and household garbage), and type III wastes (construction and demolition debris). Mr. Massey advised that 8-9 groundwater monitoring wells were installed at White Oaks Landfill in the summer of 2003, and that Type I/II landfill operations began in at the site in July 2003. He indicated that an adjoining BFI landfill began operations as a Type I/II landfill sometime around 1986 and was closed circa 1996.</p> <p>Mr. Massey told PPM that there are 8-9 monitoring wells on the landfill property, all of which are sampled during quarterly groundwater monitoring events. He advised that constituents of concern include volatile organic compounds and 15 metals including arsenic and lead. He advised that groundwater flow was from west to east. Mr. Massey advised that the large pond adjoining Meadowlark Drive was a stormwater retention pond that captured water from a former BFI landfill located just south of the pond.</p> <p>He advised that the facility does not handle hazardous waste in any form. Mr. Massey told PPM that the facility conducts quarterly groundwater monitoring and has never been out of compliance. He advised that the landfill is both clay and synthetic lined and that leachate ponds on the facility are lined as well. He advised that the facility does handle petroleum impacted soils and that they are stored in the Type I/II cells. He advised that there is one 10,000-gallon diesel AST located near the truck scales at the landfill entrance, one 10,000-gallon AST storing water used for cleaning trucks. He advised that one active 10,000-gallon diesel AST at the Delta Disposal facility as well two 250-gallon waste oil ASTs are located near the shop facility.</p>			

Interviewer:	Kody J. Chase		
Date(s):	September 12, 2011		
Name:	Brandy Pruitt		
Affiliation:	LWC		
Title/Job:	Manager of Cottonland Mobile Home Park	Phone:	318-397-2835
Address:	2800 N 7 th Street, West Monroe, Louisiana 71291		
<p>Comments: According to Brandy Pruitt, Manager of the Cottonland Mobile Home Park, the ponds located near the Cottonland Mobile Home Park adjoining the subject property, are sewage treatment ponds. She advised that there is no chlorine at the facility and that treatment of the sewage is conducted via aeration and settling. Mrs. Pruitt told PPM that a lift station is found on site as well as an old building that was a former water treatment facility. She advised that there had never been any spills or releases from either facility. She advised that the facility is permitted and that discharge from one outfall is to an unnamed ditch south of the ponds.</p>			

7.0 FINDINGS/OPINIONS

The findings of this Phase I ESA and PPM's opinions as to whether any of the suspect activities identified represent recognized environmental conditions, historical recognized environmental conditions or *de minimis* conditions associated with the property are presented below.

- **Historical and current use of the property.** The subject property has been owned by the Huenefeld family since 1916. Based on interviews, city directories, and aerial photographs the subject property has consisted primarily of farmland, residential properties, undeveloped property and woodland from 1941-2011. Currently, the property is used exclusively as farm land. The entire 725-acre subject property has been leased from the Huenefeld family since 1982 by Mr. Stanley Johnson. According to interviews, Mr. Johnson has grown corn, soybean, cotton, and millet on the property. Several environmental concerns were observed by PPM.
 - **Water wells** Eight water wells located on the property were drilled around 1997 by the owners. The wells are used several times per year to irrigate agricultural fields. The wells are not used for drinking water and they are covered. The water wells located on the property do not represent a recognized environmental condition.
 - **Gas wells** EDR indicated the presence of gas wells on the north side of the subject property. PPM did not observe the well heads or gas transmission structures during the site visit. During interviews, neither the current owner nor the previous owner, whose knowledge of the site goes back to at least 1941, were aware of the presence of gas wells on the subject property. Based on the lack of personal knowledge surrounding the reported gas wells as well as the lack of documentation involving potential gas well development and closure, the presence of gas wells, as indicated by the database report, is not considered a recognized environmental condition.
 - **Diesel Well Pumps and ASTs** Four diesel powered well pumps and four single-walled, 500-gallon ASTs formerly containing diesel fuel are located across the southern portion of the subject property. The tanks are empty most of the year. PPM did not observe evidence of leaks, stains, or hydrocarbon odor in the vicinity of the well pumps and tanks. By definition, ASTs located on the subject property represent recognized environmental conditions due to the material threat of future release; however, these tanks appeared to be relatively new and in good condition with no evidence of cracks, bulges, corrosion, or releases.
 - **Diesel AST** PPM also observed one active 10,000-gallon diesel AST, one inactive 1,000-gallon diesel AST, and one inactive 500-gallon gasoline AST on the subject property in association with the farm shop in the northwest corner of the subject property. By definition, ASTs located on a subject property represent recognized environmental conditions due to the material

threat of future release. PPM did observe light staining near the dispenser on the 10,000 gallon tank. However, the tanks appeared to be in good condition with no evidence of cracks, bulges or corrosion.

- **Farm Shop** Empty drums formerly containing fertilizers and herbicides were observed near the farm facility. PPM also observed a number of oil products including solvents, diesel exhaust fluid, lubricants and waste oil located near the farm shop. All of these products were stored under a roof. PPM also observed two empty water tanks used for spreading herbicides and other agrichemicals. Because these products have likely been stored on and mixed at the subject property for many years, their presence represents a recognized environmental condition.
- **Historical and current uses in the surrounding area.** Based on interviews, city directories, and aerial photographs, the area surrounding the subject property primarily consisted of farmland, woodland, and residential properties from at least 1941 until the 1970s. In the 1970s, the GuideCo facility was constructed southwest of the site and was used for manufacturing auto parts. The Orphan Summary of the environmental database report reported RCRA-CESQ, RUST (USTs), and NPDES facilities in the surrounding area. The report also identified one SWF/LF.
 - **EZ Mart No. 114** PPM initially observed EZ Mart No. 114 (338 Millhaven Road) during site reconnaissance. The facility was observed by as an operating active EZ Mart with a retail fuel facility and convenience store. The facility did not show up on the EDR report but was on the orphan list. PPM investigated files located on LDEQ EDMS related to EZ-Mart No. 114. The facility registered three USTs; one 10,000-gallon regular unleaded, one 10,000-gallon premium unleaded, and one 16,000-gallon diesel UST for 2010-2011.

Several spills have been reported and are documented on LDEQ EDMS. None of the releases have been from the USTs. According to the documents, one spill occurred on June 8, 2001 and occurred due to a mechanical failure of the transfer pump and/or oil water separator. Approximately 200 gallons of product were spilled and soil in the immediate area was impacted. Confirmation soil samples collected after the excavation of impacted soils as a result of the June 2001 release, revealed TPH-D concentrations in excess of the LDEQ's RECAP screening standard protective of groundwater. PPM was unable to obtain other documents related to this incident.

A second spill occurred on May 11, 2004, when a truck driver damaged a slave unit on his truck releasing product and resulted in a release that impacted soil in the immediate area around the unit. According to documents obtained from EDMS, a truck driver damaged a pump slave unit which resulted in a spill of product. Fluid was contained in a sump and removed via vacuum truck. An estimated 5 gallons of diesel were released to the surface, and approximately 5-20 gallons were spilled to the soil below the dispenser. The surface spillage was routed to an oil water separator,

while some of the subsurface spillage was removed via absorbent pads. The report indicates that residual product lingered in the soil. The spill was a result of human error. PPM was unable to obtain other documents related to this incident.

An additional diesel spill was reported on November 29, 2005. According to the report, a fiberglass line was hit during drilling which caused approximately 300-gallons of diesel to be released. Soil in the immediate area was impacted. Light non-aqueous phase liquids were observed in two monitoring wells following a release which occurred in November 2005. Additional information regarding further investigations at the facility or remedial actions was not documented. PPM was unable to obtain documents describing releases from USTs. Site hydrology would prevent surface releases from impacting the subject property because surface water flows south and southeast toward Bennett Bayou. Groundwater flow direction was not mentioned in the documents review by PPM.

Although the USTs at the site are monitored for leaks, are registered through the state of Louisiana, and no UST leaks or releases have been reported, the proximity of EZ Mart No. 114 to the subject property represents a recognized environmental condition.

- **Louisiana State Police Troop F** Louisiana State Police Troop F was identified as a RUST facility. According to information obtained from EDR Report and LDEQ EDMS, one 10,000-gallon diesel UST is located on site and used to power an emergency generator. Documents suggest that three tanks were present at one time; however, two have been removed. By definition, USTs located adjacent to the subject property represent recognized environmental conditions due to the material threat of a future release.
- **Former aircraft hangar and chemical mixing facility** A former aircraft hangar and chemical mixing facility were located on adjoining property to the northwest. This facility was built circa 1970 by Mr. Fred Huenefeld and removed in early 2011 by the current owners. According to interviews, all mixing took place on a concrete slab. Chemicals including pesticides, herbicides, fungicides and fertilizers were stored inside the building. Mr. Bruce Brooks, the most recent operator of the former airbase, indicated that only EPA certified chemicals and fertilizers were used.

According to interviews and from information gathered during site reconnaissance, approximately 10 feet of underground piping is located on adjoining property. PPM observed a dispenser coming out of the ground and confirmed that it was used to dispense Jet Fuel contained in ASTs on adjoining property.

However, based on the length of time that this facility was in operation and due to potential data gaps in both personal knowledge and publicly available documents, the former aircraft hangar and chemical mixing facility represent a recognized environmental condition.

- **Waste Connections, Inc.-White Oaks Landfill, Inc.** The orphan summary of the EDR report indicated the presence of a Type I/II and III landfill south of the subject property. PPM confirmed the existence of the active landfill operated by WCI-Inc. According to interviews and information obtained from LDEQ EDMS, the facility has permits to accept and process Type I wastes include (industrial wastes), Type II wastes (solid waste and household garbage), and type III wastes (construction and demolition debris). Documents show that 8 to 9 monitoring wells were installed at White Oaks Landfill in the summer of 2003, and that Type I/II landfill operations began in at the site in July 2003. The wells are sampled during quarterly groundwater monitoring events. Constituents of concern include volatile organic compounds and 15 metals including arsenic and lead. Interviews with the site manager indicate that the facility does not handle hazardous waste in any form. The site manager revealed that the landfill is both clay and synthetic lined and that leachate ponds on the facility are lined as well. He advised that the facility does handle petroleum impacted soils and that they are stored in the Type I/II cells.

According to interviews, two ASTs on adjoining property to the south are owned by WCI-White Oaks Landfill. One 10,000-gallon tank contained water used for truck washing, while one other 10,000-gallon tank contained diesel fuel. A ditch and 10 foot high railroad berm are located between the ASTs and the subject property presenting two hydrologic barriers. It is likely that these barriers would prevent of impacted stormwater runoff from impacting the subject property. However, by definition, ASTs located on adjoining property represent recognized environmental conditions due to the material threat of future release.

Although the facility's waste disposal units and water impoundments are lined with clay and plastic and the facility actively monitors for groundwater contamination per its groundwater monitoring plan, the presence of a landfill adjacent to the subject property, and the potential for ground water from the landfill negatively impacting the subject property represents a recognized environmental condition.

- **Delta Disposal** One 10,000-gallon diesel AST was located in the parking lot of Delta Disposal. According to interviews, two 250-gallon tanks stored waste oil and were located near the shop facility located at the Delta Disposal site. A ditch and 10 foot high railroad berm are located between the ASTs and the subject property presenting two hydrologic barriers. It is likely that these barriers would prevent product or impacted stormwater runoff originating from the Delta Disposal facility from impacting the subject property. However, by definition, ASTs located on adjoining property represent recognized environmental conditions due to the material threat of future release.
- **Browning Ferris Industries-White Oaks Landfill** PPM confirmed the existence of BFI-White Oaks Landfill. This facility was closed and sealed

and is undergoing a 30 year long monitoring program. Although the facility was permitted by the State of Louisiana to accept non-hazardous waste, and actively monitors for groundwater contamination per its groundwater monitoring plan, the site, by its nature and its proximity to the subject property, represents a recognized environmental condition.

- **GuideCo Plant** The former GuideCo plant, located on adjoining property to the southwest was a former manufacturing plant. GuideCo Properties LLC, owner of the vacant GuideCo Plant located at 11000 Millhaven Road, has successfully conducted investigation, remediation and risk management activities, and the environmental conditions at the property are protective of human health and the environment based on its current and anticipated future use as a commercial and or industrial property. The facility has been issued an official "Notice of Reuse" by the U.S. Environmental Protection Agency and the LDEQ signifying that the facility is protective of human health and the environment. Because the issuance of this notice signifies compliance with industry accepted standards regarding environmental and health regulations, the facility does not represent a recognized environmental condition.

- **Louisiana Land and Water Company Sewage Facility** According to interviews and documents obtained from EDMS, this facility treats domestic sewage via aeration and settling. It is permitted to process up to 100,000 gallons of wastewater per day. The single outfall is monitored weekly for flow, and monthly for several parameters including BOD, TSS, fecal coliform, and pH. Treated wastewater is discharged to an unnamed ditch south of the facility and adjoining the subject property and thence south and east into Gourd Bayou. Because the facility only treats residential sewage, is permitted by the state, and the discharge is regularly monitored, the facility does not represent a recognized environmental concern.

- **Pole-mounted electrical transformers located onsite.** Dielectric fluids in some electrical transformers contain PCBs. The content of the dielectric fluid for the transformers on site and on adjoining property is unknown but there were no signs of rust, leakage, staining or stressed vegetation associated with the transformers. Transformers in this area would be owned by Entergy who would retain any environmental liability associated with a release from these units. The transformers do not appear to represent a recognized environmental condition.

PPM was unable to review aerial photographs prior or city directories prior to 1941. PPM was not able to research the property to initial development, but was told during interviews by two generations of owners that the land was bought as farmland in 1916. None of the data gaps presented in **Section 1.4** were considered to be significant, and thus did not impact PPM's ability to form an opinion regarding the presence of recognized environmental conditions.

8.0 CONCLUSIONS

PPM has performed a Phase I ESA in general conformance with the scope and limitations of ASTM Standard Practice E 1527-05 at the Millhaven Plantation located near Huenefeld Road and Highway 594 in Monroe, Louisiana. This assessment has revealed no evidence of recognized environmental conditions in connection with the property, except for the following:

- **Diesel Well Pumps and ASTs** Four diesel powered well pumps and four single-walled, 500-gallon ASTs formerly containing diesel fuel are located across the southern portion of the subject property. The tanks are empty most of the year. PPM did not observe evidence of leaks, stains, or hydrocarbon odor in the vicinity of the well pumps and tanks. By definition, ASTs located on the subject property represent recognized environmental conditions due to the material threat of future release; however, these tanks appeared to be relatively new and in good condition with no evidence of cracks, bulges, corrosion, or releases.
- **Diesel ASTs** PPM also observed one active 10,000-gallon diesel AST, one inactive 1,000-gallon diesel AST, and one inactive 500-gallon gasoline AST on the subject property in association with the farm shop to the northwest. By definition, ASTs located on a subject property represent recognized environmental conditions due to the material threat of future release. These tanks appeared to be in good condition with no evidence of cracks, bulges or corrosion. PPM did observe light staining was observed near the dispenser on the 10,000 gallon tank.
- **Farm Shop** Empty drums formerly containing fertilizers and herbicides were observed near the farm facility. PPM also observed a number of oil products including solvents, diesel exhaust fluid, lubricants and waste oil located near the farm shop. All of these products were stored under a roof. PPM also observed two empty water tanks used for spreading herbicides and other agrichemicals. Because these products have likely been stored on and utilized on the subject property for many years, their continued presence on the property represents a recognized environmental condition.
- **EZ Mart No. 114** PPM initially observed EZ Mart No. 114 (338 Millhaven Road) during site reconnaissance. The facility was observed by as an operating active EZ Mart with a retail fuel facility and convenience store. The facility did not show up on the EDR report but was on the orphan list. PPM investigated files located on LDEQ EDMS related to EZ-Mart No. 114. The facility registered three USTs; one 10,000-gallon regular unleaded, one 10,000-gallon premium unleaded, and one 16,000-gallon diesel UST for 2010-2011.

Several spills have been reported and are documented on LDEQ EDMS. None of the releases have been from the USTs. According to the documents, one spill occurred on June 8, 2001 and occurred due to a mechanical failure of the

transfer pump and/or oil water separator. Approximately 200 gallons of product were spilled and soil in the immediate area was impacted. Confirmation soil samples collected after the excavation of impacted soils as a result of the June 2001 release, revealed TPH-D concentrations in excess of the LDEQ's RECAP screening standard protective of groundwater. PPM was unable to obtain other documents related to this incident.

A second spill occurred on May 11, 2004, when a truck driver damaged a slave unit on his truck releasing product and resulted in a release that impacted soil in the immediate area around the unit. According to documents obtained from EDMS, a truck driver damaged a pump slave unit which resulted in a spill of product. Fluid was contained in a sump and removed via vacuum truck. An estimated 5 gallons of diesel were released to the surface, and approximately 5-20 gallons were spilled to the soil below the dispenser. The surface spillage was routed to an oil water separator, while some of the subsurface spillage was removed via absorbent pads. The report indicates that residual product lingered in the soil. The spill was a result of human error. PPM was unable to obtain other documents related to this incident.

An additional diesel spill was reported on November 29, 2005. According to the report, a fiberglass line was hit during drilling which caused approximately 300-gallons of diesel to be released. Soil in the immediate area was impacted. Light non-aqueous phase liquids were observed in two monitoring wells following a release which occurred in November 2005. Additional information regarding further investigations at the facility or remedial actions was not documented. PPM was unable to obtain documents describing releases from USTs. Site hydrology would prevent surface releases from impacting the subject property because surface water flows south and southeast toward Bennett Bayou. Groundwater flow direction was not mentioned in the documents review by PPM.

Although the USTs at the site are monitored for leaks and registered through the state of Louisiana, and no UST leaks or releases have been reported, the proximity of EZ Mart No. 114 represents a recognized environmental condition.

- **Louisiana State Police Troop F** Louisiana State Police Troop F was identified as a RUST facility. According to information obtained from EDR Report and LDEQ EDMS, one 10,000-gallon diesel UST is located on site and used to power an emergency generator. Documents suggest that three tanks were present at one time; however, two have been removed. By definition, USTs located adjacent to the subject property represent recognized environmental conditions due to the material threat of a future release.
- **Former aircraft hangar and chemical mixing facility** A former aircraft hangar and chemical mixing facility were located on adjoining property to the northwest. This facility was built circa 1970 by Mr. Fred Huenefeld and removed in early 2011 by the current owners. According to interviews, all mixing took place on a concrete slab. Chemicals including pesticides,

herbicides, fungicides and fertilizers were stored inside the building. Mr. Bruce Brooks, the most recent operator of the former airbase, indicated that only EPA certified chemicals and fertilizers were used.

According to interviews and from information gathered during site reconnaissance, approximately 10 feet of underground piping is located on adjoining property. PPM observed a dispenser coming out of the ground and confirmed that it was used to dispense Jet Fuel contained in ASTs on adjoining property.

However, based on the length of time that this facility was in operation and due to potential data gaps in both personal knowledge and publicly available documents, the former aircraft hangar and chemical mixing facility represent a recognized environmental condition.

- **Waste Connections, Inc.-White Oaks Landfill, Inc.** The orphan summary of the EDR report indicated the presence of a Type I/II and III landfill south of the subject property. PPM confirmed the existence of the active landfill operated by WCI-Inc. According to interviews and information obtained from LDEQ EDMS, the facility has permits to accept and process Type I wastes include (industrial wastes), Type II wastes (solid waste and household garbage), and type III wastes (construction and demolition debris). Documents show that 8 to 9 monitoring wells were installed at White Oaks Landfill in the summer of 2003, and that Type I/II landfill operations began in at the site in July 2003. The wells are sampled during quarterly groundwater monitoring events. Constituents of concern include volatile organic compounds and 15 metals including arsenic and lead. Interviews with the site manager indicate that the facility does not handle hazardous waste in any form. The site manager revealed that the landfill is both clay and synthetic lined and that leachate ponds on the facility are lined as well. He advised that the facility does handle petroleum impacted soils and that they are stored in the Type I/II cells.

According to interviews, two ASTs on adjoining property to the south are owned by WCI-White Oaks Landfill. One 10,000-gallon tank contained water used for truck washing, while one other 10,000-gallon tank contained diesel fuel. A ditch and 10 foot high railroad berm are located between the ASTs and the subject property presenting two hydrologic barriers. It is likely that these barriers would prevent of impacted stormwater runoff from impacting the subject property. However, by definition, ASTs located on adjoining property represent recognized environmental conditions due to the material threat of future release.

Although the facility's waste disposal units and water impoundments are lined with clay and plastic and the facility actively monitors for groundwater contamination per its groundwater monitoring plan, the presence of a landfill adjacent to the subject property, and the potential for ground water from the landfill negatively impacting the subject property represents a recognized environmental condition.

- **Delta Disposal** One 10,000-gallon diesel AST was located in the parking lot of Delta Disposal. According to interviews, two 250-gallon tanks stored waste oil and were located near the shop facility located at the Delta Disposal site. A ditch and 10 foot high railroad berm are located between the ASTs and the subject property presenting two hydrologic barriers. It is likely that these barriers would prevent product or impacted stormwater runoff originating from the Delta Disposal facility from impacting the subject property. However, by definition, ASTs located on adjoining property represent recognized environmental conditions due to the material threat of future release.

- **Browning Ferris Industries-White Oaks Landfill** PPM confirmed the existence of BFI-White Oaks Landfill. This facility was closed and sealed and is undergoing a 30 year long monitoring program. Although the facility was permitted by the State of Louisiana to accept non-hazardous waste, and actively monitors for groundwater contamination per its groundwater monitoring plan, the site, by its nature and its proximity to the subject property, represents a recognized environmental condition.

9.0 ADDITIONAL SERVICES

There were no additional services provided by PPM under this scope of work.

10.0 COMMONLY USED ABBREVIATIONS

The following is a list of abbreviations that are commonly used in Phase I ESA reports:

AST	aboveground storage tank
ASTM	American Society of Testing and Materials
ATG	Automatic Tank Gauge
BTEX	benzene, toluene, ethylbenzene, and xylenes (gasoline components)
BDL	Below Detection Limits
BGS	below ground surface
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CESQG	Conditionally Exempt Small Quantity Generator (<100 kg per month)
CFR	Code of Federal Regulations
CORRACTS	Corrective Action Reports
ECHO	Enforcement & Compliance History Online (from USEPA)
EDR	Environmental Data Resources
ERNS	Emergency Response and Notification System
ESA	Environmental Site Assessment
FRP	Fiberglass Reinforced Plastic
LDEQ	Louisiana Department of Environmental Quality
LQG	Large Quantity Generator of hazardous waste (>1,000 kg per month)
LUST	leaking underground storage tank
NFA	No Further Action
NFRAP	No Further Remedial Action Planned
NPL	National Priority List
MTBE	methyl tertiary butyl ether (common gasoline additive)
PAH	polynuclear aromatic hydrocarbons (common diesel components)
ppm	parts per million
PPM	PPM Consultants, Inc.
RCRA	Resource Conservation and Recovery Act
RUST	registered underground storage tank
SWD	Solid Waste Disposal
SQG	Small Quantity Generator of hazardous waste (100 to 1,000 kg per month)
TSD	Treatment, Storage, and Disposal
USEPA	United States Environmental Protection Agency
USDA	United States Department of Agriculture
USGS	United States Geological Survey
UST	underground storage tank