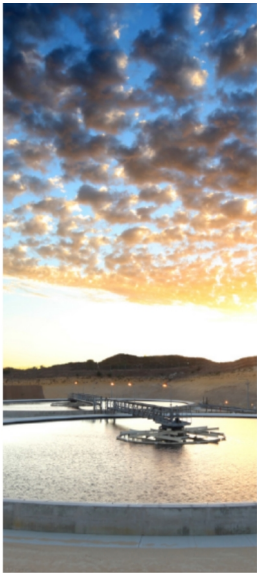


Exhibit BB. T.O. Allen Industrial Park
South Phase I Environmental Site
Assessment





T.O. Allen Industrial Park South Phase I Environmental Site Assessment



Phase I Environmental Site Assessment

Former Allen Estate (Southern Parcel)

22000 Highway 90

Iowa, Louisiana

One Acadiana



Executive Summary

GHD was retained by One Acadiana to complete a Phase I Environmental Site Assessment (ESA) of the southern parcel of the Allen Estates property located at 22000 Highway 90 in Iowea, Louisiana (Site). The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs), as defined in ASTM International (ASTM) Standard E1527-13 (the Standard), at the Site. This ESA was conducted to assist One Acadiana in conducting all appropriate inquiries into previous ownership and use of the Site to qualify for specific landowner liability protections under the Comprehensive Environmental Response, Compensation business environmental risk (BER), as defined in the Standard, for the Site. The Phase I ESA Site reconnaissance was conducted by GHD on September 27, 2016.

The Site consists of an approximately 143-acre parcel of rural agricultural land located near Iowea, Louisiana. The Site was completely overgrown with vegetation at the Site of GHD's reconnaissance. According to Site personnel and based on a review of historical documents, the Site was developed as cultivated land prior to the 1930s and was part of larger farmstead. According to the property owner, the Site has never been developed with any structures.

Findings and Opinion

Based on the Phase I ESA, including the Site reconnaissance, database search, historical records reviewed, information provided by Site personnel, and interviews, the following findings were identified regarding RECs, historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), BER, and *de minimis* conditions, as defined in the Standard, at the Site:

- i. **Agricultural Chemicals:** Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have historically been used on the Site. Information regarding historical use, storage or application rates was not available. If the chemicals were applied in accordance with manufacturer recommendations, residuals remaining in Site soils would be expected to be similar to other area properties. No information was available to determine whether residual concentrations exceeded government use or exposure criteria. Application of agricultural chemicals for intended use is not considered a release; therefore, potential residuals remaining would not be considered an REC. However, the potential presence of agricultural chemicals may have resulted in Site impairment that may have or could result in adverse impact to Site soil and groundwater. Consideration should be given to the potential presence of these chemicals when evaluating business environmental risk and future land use of the Site.

Conclusions

GHD has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of the Standard of the southern parcel of the Allen Estate property located at 22000 Highway 90 in Iowea, Louisiana. Any exceptions to, or deletions from this practice are described in Section 1 of this report.



Recognized Environmental Conditions

This assessment has revealed no evidence of RECs (including CRECs) in connection with this Site.

Business Environmental Risk

The following BER, as described above, has been identified to exist in connection with this Site.

- Agricultural Chemicals

This summary does not contain all of the information that is found in the full report. The report should be read in its entirety to obtain a more complete understanding of the information provided, and to aid in any decisions made, or actions taken, based on this information.



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Appendix B	Assessor Qualifications
Appendix C	Environmental Database Search Results
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1. Introduction

GHD was retained by One Acadiana to complete a Phase I Environmental Site Assessment (ESA) of the southern parcel of the Allen Estate property located at 22000 Highway 90 in Iowa, Louisiana (Site). The purpose of the Phase I ESA was to identify recognized environmental conditions (RECs), as defined in ASTM International (ASTM) Standard E1527-13 (the Standard), at the Site. This ESA was conducted to assist One Acadiana in conducting all appropriate inquiries into previous ownership and use of the Site to qualify for specific landowner liability protections under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) for the Site and to evaluate business environmental risk (BER), as defined in the Standard, for the Site. The Phase I ESA Site reconnaissance was conducted by GHD on September 27, 2016. A Site location map is provided on Figure 1. A Site plan is provided on Figure 2. Photographs taken during the Site reconnaissance are presented in Appendix A.

The Phase I ESA was conducted in general accordance with the Standard for conducting environmental assessments. The assessment included an environmental database search, historical records review, a Site reconnaissance of accessible areas, a review of relevant Site records made available to GHD, and interviews with individuals associated with the Site. This Phase I ESA was prepared by Jeroen Winterink and Charles D. Kizina of GHD, both of whom are environmental professionals, as defined in the Standard. Copies of curricula vitae outlining their qualifications are contained in Appendix B.

The following terms used in this report are defined in the Standard as follows:

- REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment (*de minimis* conditions are not RECs).
- Controlled REC (CREC) is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (e.g., property use restrictions, activity and use limitations, institutional controls, or engineering controls).
- Historical REC (HREC) is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (i.e., property use restrictions, activity and use limitations, institutional controls or engineering controls). HRECs are not RECs.
- BER means a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of



commercial real estate, not necessarily limited to those environmental issues required to be investigated by the Standard.

- *De minimis* condition is a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* conditions are not RECs or CRECs.

The following tasks were conducted during the assessment:

- Interviews with personnel associated with the Site
- Review of Federal and State environmental databases and historical records (e.g., fire insurance maps, city directory, etc.)
- Review of historical aerial photographs of the Site
- Review of past and current property use and adjoining property occupancy
- Reconnaissance of the facilities, equipment, utility services, operations, and associated Site records
- Observations of conditions that represent releases or threatened (i.e., likely) releases of hazardous substances or petroleum products to the ground, surface waters or groundwater of the Site
- Review of chemical use and storage and spill/release incidents
- Review of the results of any prior reconnaissance conducted at the Site
- Review of waste handling, accumulation, storage, and disposal practices
- Review of air emissions and wastewater discharges
- Review of equipment that potentially contains polychlorinated biphenyls (PCBs)
- Review of aboveground and underground storage tank records
- Review of previous environmental reports prepared for the Site

GHD relied on information received from third parties and during the ESA interviews to the extent that the information was reasonably ascertainable, and also assumed the information received to be accurate unless contradicted by written documentation or field observations.

The following report summarizes the information gathered by GHD during the Phase I ESA and identifies RECs, HRECs, CRECs, BERs, and *de minimis* conditions as defined in the Standard at the Site.

Evaluation of BER issues may involve opining on findings of environmental concern that do not constitute a release of a hazardous substance and/or petroleum product (i.e., non-scope considerations). Such opinions will be found within the body of this report.

1.1 Exceptions

No exceptions to the Standard were taken in completion of this ESA.



1.2 Limiting Conditions

The following limiting conditions were experienced in completion of the Phase I ESA

- Portions of the Site were densely vegetated and could not be traversed or thoroughly observed.

1.3 Significance and Use

This ESA was conducted in a manner consistent with that level of care and skill exercised by members of the environmental engineering and science profession currently practicing under similar conditions, and was based upon the information made available to GHD representatives at the time of this assessment. It remains important to recognize that no Phase I ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with the Site. The performance of the assessment is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a Site. The User, as defined in the Standard, must recognize reasonable limits of time and cost. For the purpose of this Phase I ESA, the User has been identified as One Acadiana Company.

The Phase I ESA has been prepared for the use of One Acadiana and may not be relied upon by any other party without GHD's written consent. In accordance with Section 4.6 of the Standard, this Phase I ESA is viable until March 26, 2017 which is 180 days from the oldest primary component of the ESA.

2. Site Description and Location

2.1 Site Description

The Site consists of an approximately 143-acre parcel of rural agricultural land located near Iowa, Louisiana. The Site was completely overgrown with vegetation at the time of GHD's reconnaissance.

According to Site personnel and based on a review of historical documents, the Site was developed as cultivated land prior to the 1930s and was part of a larger farmstead. According to a review of available information, no structures are currently or have been historically located at the Site. Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have historically been used on the Site. Information regarding historical use, storage, or application rates was not available.

No pits, ponds, lagoons, or areas of stressed vegetation were observed on Site during the Site reconnaissance.

2.2 Environmental Setting

The Site is located in a predominantly rural and residential area in the western portion of Jefferson Davis Parish, Louisiana, and east of Iowa, Louisiana. General topographic gradient



at the Site and surrounding area is south-southeast, based on the United States Geological Survey (USGS) topographic map and information provided in the GeoCheck section of the EDR Radius Map reports.

No lakes or ponds are located on Site. The closest surface water is the Louisiana Irrigation Canal, located approximately 2500 feet to the west. According to the EDR database reports, the Site is not listed as being in the 100-year or 500-year flood zone.

According to information provided in the GeoCheck section of the EDR Radius Map reports, soils underlying the Site consist of the Crowley Series and Mowata Series and soil surface textures consist of silt loams which are somewhat poorly drained to poorly drained, with very slow infiltration rates. Based on the general topographic gradient at the Site, it is estimated that shallow groundwater beneath the Site would flow towards south-southeast. No Site-specific information was available regarding Site soils, depth to groundwater or groundwater flow direction.

Based on the USGS 7.5-Minute Lacassine, Louisiana Topographic Map, the Site is located at approximately 22 feet above mean sea level.

3. Environmental Databases Search and Document Review

3.1 Environmental Databases Search

GHD contracted EDR to conduct a search of federal and state environmental databases. Based on the address of the Site and the Site boundaries, the database searches were completed to assist in the identification of RECs in connection with the Site and to assess the likelihood of an impact to the Site from migrating hazardous substances or petroleum products within the approximate minimum search distance (AMSD) specified in the Standard as follows:

Database	Search Radius
National Priority List (NPL)	1 mile
Delisted NPL Database	1 mile
NPL Liens	Site only
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)/ now known as Superfund Enterprise Management System (SEMS)	0.5 mile
CERCLIS No Further Remedial Action Planned (CERC NFRAP)/now known as SEMS-ARCHIVE	0.5 mile
Corrective Action Report (CORRACTS)	1 mile
Resource Conservation and Recovery Act Information (RCRA) Treatment, Storage or Disposal Facility (TSDF)	0.5 mile
RCRA Large Quantity Generator (RCRA-LQG)	Site/Adjoining Property
RCRA Small Quantity Generator (RCRA-SQG)	Site/Adjoining Property
RCRA Conditionally Exempt Small Quantity Generators (RCRA-CESQG)	Site/Adjoining Property



Database	Search Radius
Emergency Response Notification System (ERNS)	Site only
Toxic Chemical Release Inventory System (TRIS)	Site only
US Engineering Controls	0.5 mile
US Institutional Controls	0.5 mile
US Brownfields List	0.5 mile
Superfund (CERCLA) Consent Decrees (Consent)	1 mile
Records of Decision (ROD)	1 mile
Department of Defense (DOD)	1 mile
CERCLA Lien Information (LIENS 2)	Site only
Potential and Confirmed Sites List (SHWS)	1 mile
Solid Waste Facilities (SWF) Landfill (LF) Sites	0.5 mile
Open Dump Inventory (ODI)	0.5 mile
Underground Storage Tank (UST) Facility List	Site/Adjoining Property
Leaking Underground Storage Tank (LUST)	0.5 mile
EDR Recovered Government Archive LUST (RGA-LUST)	0.5 mile
Historical LUST (HIST LUST) Facility List	Site/Adjoining Property
Environmental Liens (Liens)	Site only
Spills	Site only
Spills 90	Site only
Division of Remediation Services Database (REM)	0.5 mile
Institutional and/or Engineering Controls (AUL)	0.5 mile
Voluntary Remediation Program Sites (VCP)	0.5 mile
Drycleaners	0.25 mile
2020 Corrective Action Program List (2020 COR ACTION)	0.5 mile
Risk Management Plan (RMP)	Site only
Indian Reservations	1 mile
Indian UST	Site/Adjoining Property
Indian LUST	0.5 mile
Indian Voluntary Cleanup Priority Listing (Indian VCP)	0.5 mile
Indian ODI	0.5 mile

A copy of the database searches, which includes definitions for the above-referenced databases, are included as Appendix C. It should be recognized that the availability, accuracy and completeness of the record information may vary among information sources, including governmental sources. GHD reviewed information for properties identified within the referenced AMSD. GHD considers a variety of factors in determining which off-Site properties, if any, have the potential to impact the Site. These factors include, but are not limited to, the following:

- Type of database on which a property was identified
- Information presented in the EDR Radius Map report and reasonably ascertainable government databases
- Direction and distance of the property from the Site
- Suspected or known groundwater flow direction at or near the Site
- Likelihood that released contaminants, if any, could migrate to the Site
- Surface and subsurface features (e.g., soil types, utility corridors, etc.)



The following is a summary of the databases searched with the findings as listed.

3.1.1 Database Listing for the Site

The Site address was not listed in any of the aforementioned databases searched.

3.1.2 Database Listings for Adjoining Properties

No adjoining properties were listed in any of the aforementioned databases searched.

3.1.3 Additional Area Properties

No area properties within the effective AMSD of the Site were listed in any of the aforementioned databases searched.

3.1.4 Unmapped Properties

No unmapped properties were listed in the EDR Radius Map report. No unmapped properties were listed in the EDR Radius Map report.

3.2 Historical Records Review

GHD reviewed the following information, where reasonably ascertainable, to identify the historical usage of the Site and adjoining properties.

- Sanborn Fire Insurance Maps
- Property Title Search
- Historical Aerial Photographs
- City Directories
- Historical Topographic Maps

3.2.1 Sanborn Fire Insurance Maps

Sanborn Fire Insurance maps assist in the identification of historical land use and commonly illustrate the existence and location of aboveground and underground storage tanks, structures, improvements, and facility operations. No Sanborn maps were reported to be available for the Site in the EDR Sanborn Library, LLC collection.

A copy of the Certified Sanborn Map reports is presented in Appendix D.

3.2.2 Property Title Search

Property title information for the Site was not available from One Acadiana.

3.2.3 Historical Aerial Photographs

Aerial photographs assist in the identification of Site features and outdoor activities of potential environmental concern. Aerial photographs of the Site for the years 1952, 1971,



1981, 1985, 1990, 1994 1998, 2004, 2005, 2006, 2007, 2009 and 2010 were available from EDR and were reviewed by GHD. The specific details observed at the Site and adjoining properties are dependent on the scale and quality of the aerial photographs reviewed. The aerial photographs were reviewed at a scale of one inch equals approximately 500 feet, except for the 1990 and 2004 aerial photographs which were reviewed at a scale of one inch equals approximately 750 feet. Following is a summary of observations based on the review of the aerial photographs.

- 1952: The 1952 aerial photograph depicts the Site as vacant land and the adjoining properties as vacant sparsely vegetated land. A road (current US Highway 90) borders the norther Site boundary. A levee appears to surround the north, south and west sides of the Site. A north-south stream crosses the Site.
- 1971: The 1971 aerial photograph depicts the Site and adjoining properties in a configuration similar to the 1952 aerial photograph, except that a residence is adjoining the east side of the Site along the south side of Highway 90.
- 1981-10: The 1981, 1985, 1990, 1994 1998, 2004, 2005, 2006, 2007, 2009 and 2010 aerial photographs depict the Site and adjoining properties in a configuration similar to 1971 aerial photograph.

Copies of reviewed aerial photographs of the Site are presented in Appendix F.

3.2.4 City Directories

A city directory search was conducted by EDR from the first available directory to the present. Directories were available and were reviewed by EDR at approximately 5-year intervals beginning in 1993 and ending in 2013.

According to EDR, city directory coverage was not available for the Site address.

A copy of the city directory search for the Site address is presented in Appendix G.

3.2.5 Historical Topographic Maps

Historical topographic maps were reviewed to assist in the identification of historical land use, to document the general development of the Site and properties in the vicinity of the Site, and to identify potential on-Site fill activities. Historical topographic maps of the Site and surrounding areas for the years 1946, 1955, 1971, 1985, and 2012 were available from EDR and were reviewed by GHD. The 1946 topographic map was reviewed at a scale of 1:31680, the 1955 and 1971 topographic maps were reviewed at a scale of 62500 and the remaining topographic maps were reviewed at a scale of 1:24000. Due to the size of the Site, two maps were generally provided for each reviewed. Following is a summary of observations based on review of the historical topographic maps.

- 1946: The 1946 topographic maps depict the Site as vacant vegetated land. A road is depicted along the northern side of the Site at the location of Highway 90. The Southern Pacific railroad is depicted approximately 1500 feet to the north of the Site.



1955: The 1955, 1971, 1985 and 2012 topographic maps depict the Site and surrounding area in a similar configuration as the 1946 topographic map.

It should be noted that topographic maps do not always accurately depict structures and development as of the date of the map.

Copies of reviewed historical topographic maps of the Site are presented in Appendix H.

3.3 Government Records Review

GHD submitted FOIA requests for the Site address to:

- The Lacassine Volunteer Fire Department
- Louisiana Department of Environmental Quality (LDEQ)
- Louisiana Department of Natural Resources (LDNR)

Environmental records associated with utilities (i.e., septic systems, wells, etc.), hazardous and solid waste, water, air, remediation, emergency responses, spills/releases, underground and aboveground storage tanks were requested. It should be noted that summarized information received from the agencies is not intended to be all inclusive of the complete files obtained from the agencies; but only to briefly summarize significant findings.

Additionally, GHD conducted a search on the U.S. EPA's MyPropertyInfo website to determine if information was available based on the Site address. The Site address was not listed on the U.S. EPA MyPropertyInfo website.

GHD conducted a search of the Strategic Online Natural Resources Information System (SONRIS) online database maintained by the LDNR. According to the database search, there are no compliance issues associated with the Site.

GHD conducted a search of the ECHO website. GHD's search on the U.S. EPA ECHO website found no information pertaining to the Site.

GHD contacted the Lacassine Volunteer Fire Department regarding any records of USTs or spills at the Site. According to Chief Shane Johnson there are no records of USTs or spills at the Site.

GHD conducted a search of the Electronic Data Management System (EDMS) online database maintained by the LDEQ. According to the database search, there are no compliance issues associated with the Site.

No permanent structures are currently located on the Site and no current and/or former addresses are known to have been associated with the Site. As such, no other Freedom of Information Act (FOIA) requests were submitted for the Site.



3.4 Recorded Environmental Clean-up Liens

GHD contracted EDR to conduct a search of environmental liens and activity and use limitations (AULs) associated with the ownership or occupation of the (Parcel Identification Number: 800007200).

Based on documentation provided by EDR, Linda Allen Lotz and Steven Lotz purchased the Site from Samuel W. Allen and Judith Lantz Allen on June 4, 1991 (date recorded).

The environmental lien and AUL search conducted by EDR indicated that no environmental liens or AULs were recorded for the Site (as of October 14, 2016).

The Site address was not listed in the EDR Radius Map report as having any environmental liens or AULs. Site personnel were unaware of any environmental liens or AULs associated with the Site address.

A copy of the EDR Environmental Lien and AUL Search Report is provided in Appendix I..

3.5 User Information

A User Questionnaire was submitted to Mr. Zach Hager of One Acadiana for completion to address certain User responsibilities in accordance with the Standard. Mr. Hager completed the User Questionnaire, a copy of which is provided in Appendix J. The answers to the User Questionnaire were considered when determining the findings of this report.

3.6 Adjoining Properties

The Site is bordered by the following properties:

North: By US Highway 90 and beyond by agricultural land with a BNSF railway further to the north

East: By agricultural land and residential property

South: By agricultural land

West: By agricultural land

No activities were observed on the adjoining properties during the Site reconnaissance, as viewed from the Site and publicly accessible areas that appeared to pose an obvious risk of migration of hazardous substances or petroleum products to the Site. No evidence of gas or oil wells, water supply wells, or bulk chemical/petroleum storage was observed on properties adjoining the Site.

Based on available information, no adjoining properties were listed in the EDR Radius Map report regarding the use or storage of hazardous substances or petroleum products that pose a risk of migration to the Site. Based on the review of historical aerial photographs, city directories, and historical topographic maps, no operations or conditions that would typically result in a release of hazardous substances or petroleum products were identified relative to the Site.



Individuals associated with the Site were unaware of the release or likely release of hazardous substances or petroleum products that would potentially migrate to the Site from the adjoining properties.

Based on the above, no FOIA requests were submitted to local, state, or federal regulatory agencies for the adjoining properties.

Based on the available information reviewed during this Phase I ESA, no adjoining properties were identified that pose an obvious risk of groundwater or soil vapor migration of hazardous substances or petroleum products to the Site that require further evaluation.

3.7 Previous Site Investigations/ESAs

The following previous ESAs or environmental investigative reports were prepared for the Site and were provided by for GHD review:

- Phase I Environmental Assessment for the Site prepared by GHD Services, for Bakken Oil Express (BOE) & E-Rail Commerce, dated August 31, 2015

Phase I ESA, GHD, August 31, 2015

At the time of the August 31, 2015 Phase I ESA, the Site was cultivated agricultural land. GHD concluded that no RECs were identified to exist at the Site.

A copy of the text, tables and figures from the previous ESA is presented in Appendix J.

4. Site Reconnaissance

On September 27, 2016, Jeroen Winterink of GHD completed a reconnaissance of the property that comprises the Site. The visit included a reconnaissance of the Site review of relevant Site records available to GHD, visual observations of adjoining properties as viewed from the Site and surrounding roadways, and interviews with individuals associated with the Site. GHD was not accompanied during the Site reconnaissance. A subsequent telephone interview was conducted using a prepared questionnaire covering environmental and other Site-related topics. GHD employs a systematic approach to the Site reconnaissance process that seeks to obtain information indicating the likelihood of identifying RECs in connection with the Site, including both exterior observations and those associated with the interior of any structures, as applicable on the Site. Any significant obstructions encountered during the Site reconnaissance were previously identified in Section 1.

A telephone interview was conducted with Gayle Godeaux, Site owner representative, on October 23, 2016. Ms. Godeaux, was identified as the key Site manager to be interviewed. Ms. Godeaux has been associated with the Site for over 50 years, and provided information regarding Site operations and historical Site use.

4.1 Utility Services

According to Ms. Godeaux, potable water is not currently supplied to the Site.



According to Site personnel, no drinking water supply, oil/gas, monitoring, or dry wells are currently or were historically present on the Site. No evidence of any water supply, oil/gas, monitoring, or dry wells was observed by GHD during the Site inspection.

According to Ms. Godeaux, no septic systems are currently present on the Site. No evidence of any septic systems was observed by GHD during the Site inspection.

Electricity and natural gas service is available along Highway 90.

4.2 Underground Storage Tanks (USTs)

According to Site personnel, no USTs are currently located at the Site or are known to have previously been located on Site. No evidence of USTs (e.g., vent pipes, fill ports, etc.) was observed by GHD during the Site reconnaissance. The Site was not listed in the databases searched as having any USTs or releases therefrom.

4.3 Aboveground Storage Tanks (ASTs)

According to Site personnel, no ASTs are currently or have historically been located at the Site. GHD observed no evidence of current or former ASTs during the Site reconnaissance. The Site address was not listed in the AST database reviewed.

4.4 Raw Material and Chemical Use and Storage

No chemicals were observed at the Site by GHD during the Site reconnaissance. No soil staining or distressed vegetation was observed by GHD during the Site reconnaissance.

4.5 Non-Hazardous Waste

Based on observations during the Site inspection, no non-hazardous waste is currently generated on Site. According to Site personnel, no non-hazardous wastes have been disposed on Site. No evidence of the on-Site disposal of non-hazardous waste was observed by GHD during the Site reconnaissance or in the aerial photographs reviewed.

4.6 Hazardous/Universal Waste

According to Site personnel, the Site does not generate any universal or hazardous wastes. No evidence of the on-Site generation or management of hazardous waste was observed by GHD during the Site reconnaissance. The Site is not listed in the databases reviewed as a hazardous waste generator or management facility.

4.7 Wastewater/Sewers

According to Site personnel, no wastewater is currently generated or discharged on Site.

4.8 Stormwater

Stormwater generated at the Site infiltrates undeveloped Site surfaces or flows via sheet flow to the east.



No evidence of outdoor storage of materials or industrial activity with the potential to impact stormwater runoff quality was observed by GHD during the Site reconnaissance.

4.9 Air Emissions

According to Site personnel and based on GHD 's observations, there are no air emissions sources present at the Site.

4.10 Polychlorinated Biphenyls (PCBs)

Electricity is not currently provided to the Site. Jefferson Davis Electric Cooperative provides electrical service to the vicinity of the Site. Several pole-mounted transformers located along US Highway 90 provide electricity to the adjoining property. None of the transformers were observed to have labels indicating PCB content, and none of the transformers were observed as being stained or as having evidence of any leakage of dielectric fluid. The transformers are owned by the utility and the utility would be responsible for any reporting, inspections, testing, or release response. No potential PCB-containing equipment was observed on Site by GHD during the Site reconnaissance.

4.11 Spills/Releases

According to Site personnel, no spills or releases of hazardous substances or petroleum products have occurred at the Site. No obvious evidence of any spills or releases of hazardous substances or petroleum products was observed by GHD during the Site reconnaissance. No evidence of any exterior staining or distressed vegetation was observed during the Site reconnaissance. The Site was not listed in the ERNS or Spills databases.

4.12 CERCLA Liability Potential

The Site is not listed on the NPL or in the State Hazardous Waste Sites Database. The Site has never defended any environmental-related claims or litigation asserted by any governmental agency or third party, and no potential claims or litigation presently exist to the best knowledge of Ms. Godeaux. According to Ms. Godeaux, the Site has never received notification from any government agency or third party of liability as a potential responsible party for any hazardous waste treatment, storage, or disposal Site.

5. Summary of Identified Environmental Issues

5.1 Findings and Opinion

Based on the Phase I ESA including the Site reconnaissance, database search, historical records reviewed, information provided by Site personnel, and interviews, the following findings were identified regarding RECs, HRECs, CRECs, BERs, and *de minimis* conditions as defined in the Standard, at the Site:

- i. **Agricultural Chemicals:** Based on the historical use of the Site as cultivated land, agricultural chemicals such as pesticides, herbicides, and fertilizer would likely have



historically been used on the Site. Information regarding historical use, storage or application rates was not available. If the chemicals were applied in accordance with manufacturer recommendations, residuals remaining in Site soils would be expected to be similar to other area properties. No information was available to determine whether residual concentrations exceeded government use or exposure criteria. Application of agricultural chemicals for intended use is not considered a release; therefore, potential residuals remaining would not be considered an REC. However, the potential presence of agricultural chemicals may have resulted in Site impairment that may have or could result in adverse impact to Site soil and groundwater. Consideration should be given to the potential presence of these chemicals when evaluating business environmental risk and future land use of the Site.

5.2 Conclusions

GHD has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of the Standard of the southern parcel of the Allen Estates Site located at 22000 Highway 90 in Iowa, Louisiana. Any exceptions to, or deletions from this practice are described in Section 1 of this report.

5.2.1 Recognized Environmental Conditions

This assessment has revealed no evidence of RECs (including CRECs) in connection with this Site.

5.2.2 Business Environmental Risk

The following BER, as described above, was identified to exist in connection with this Site.

- Agricultural Chemicals

5.3 Data Gaps/Data Failure

A data gap, as defined in the Standard, is an absence of information that affects the ability of the environmental professional to identify RECs. Data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met. Data failure is not uncommon in trying to identify the use of the Site at 5 year intervals back to first use or 1940 (whichever is earlier). The following data gap was identified in this Phase I ESA.

- **Historical Source Interval:** Standard historical sources reviewed for this ESA were not available at the 5-year intervals described in Section 8.3.2.1 of the Standard. Additional information sources were not considered reasonably ascertainable. Based on the consistent historical use of the Site as undeveloped land, it is unlikely that additional information would impact the conclusions of this report.



6. Environmental Professional Statement

This Phase I ESA was completed by or under the direct supervision of an Environmental Professional (EP), who to the best of our professional knowledge and belief, meets the definition of Environmental Professional as defined in §312.10 of 40 CFR 312. The EP has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed all appropriate inquiries (AAI) in conformance with the standards and practices set forth in 40 CFR Part 312. Under the final AAI Standard, certain aspects of the Phase I ESA (interviews, on-site visual reconnaissance, the historical records review, and the search for environmental liens) may require an update if the timeframe between their completion and acquisition of the Site exceeds 180 days.

7. References

- ASTM Standard E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.
- The EDR Radius Map™ Report with GeoCheck®, 22000 Highway 90 Street, Iowa, Louisiana, dated October 5, 2016
- Certified Sanborn® Map Report, 22000 Highway 90 Street, Iowa, Louisiana, EDR, dated October 5, 2016
- The EDR Aerial Photo Decade Package, 22000 Highway 90 Street, Iowa, Louisiana, dated October 6, 2016
- The EDR-City Directory Abstract, 22000 Highway 90 Street, Iowa, Louisiana, dated October 5, 2016
- EDR Historical Topographic Map Report, 22000 Highway 90 Street, Iowa, Louisiana, dated October 5, 2016
- The EDR Environmental Lien Search, Parcel Numbers: 800007200, dated October 14, 2016
- Telephone interview with Ms. Godeaux on October 21, 2016
- United States Environmental Protection Agency MyPropertyInfo website



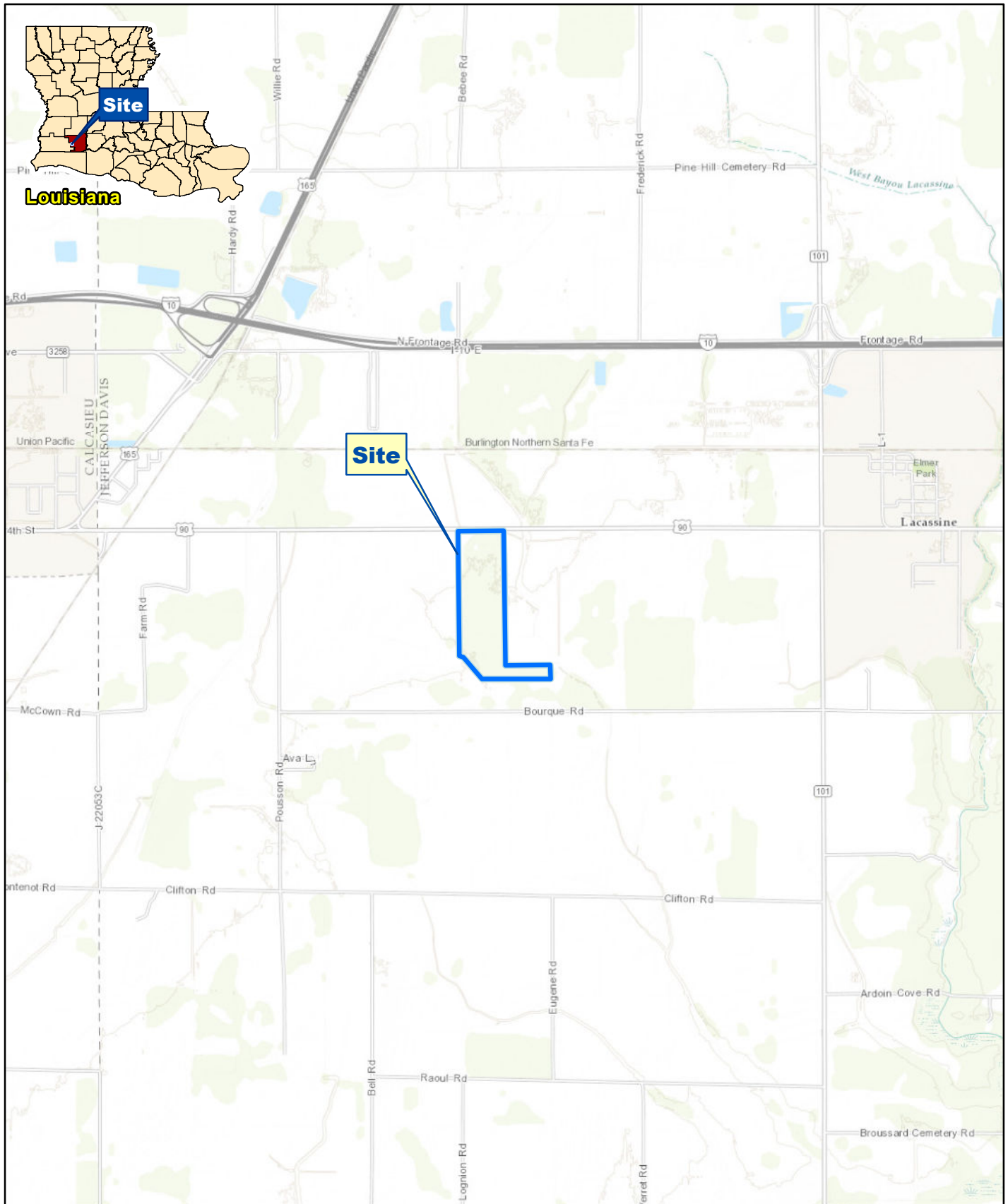
All of Which is Respectfully Submitted,
GHD

A handwritten signature in blue ink, appearing to read 'Jeroen'.

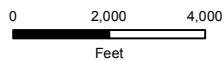
Jeroen Winterink

A handwritten signature in blue ink, appearing to read 'Charles D. Kizina'.

Charles D. Kizina



Source: ESRI World Topographic Maps.



Coordinate System:
NAD 1983 UTM Zone 15N

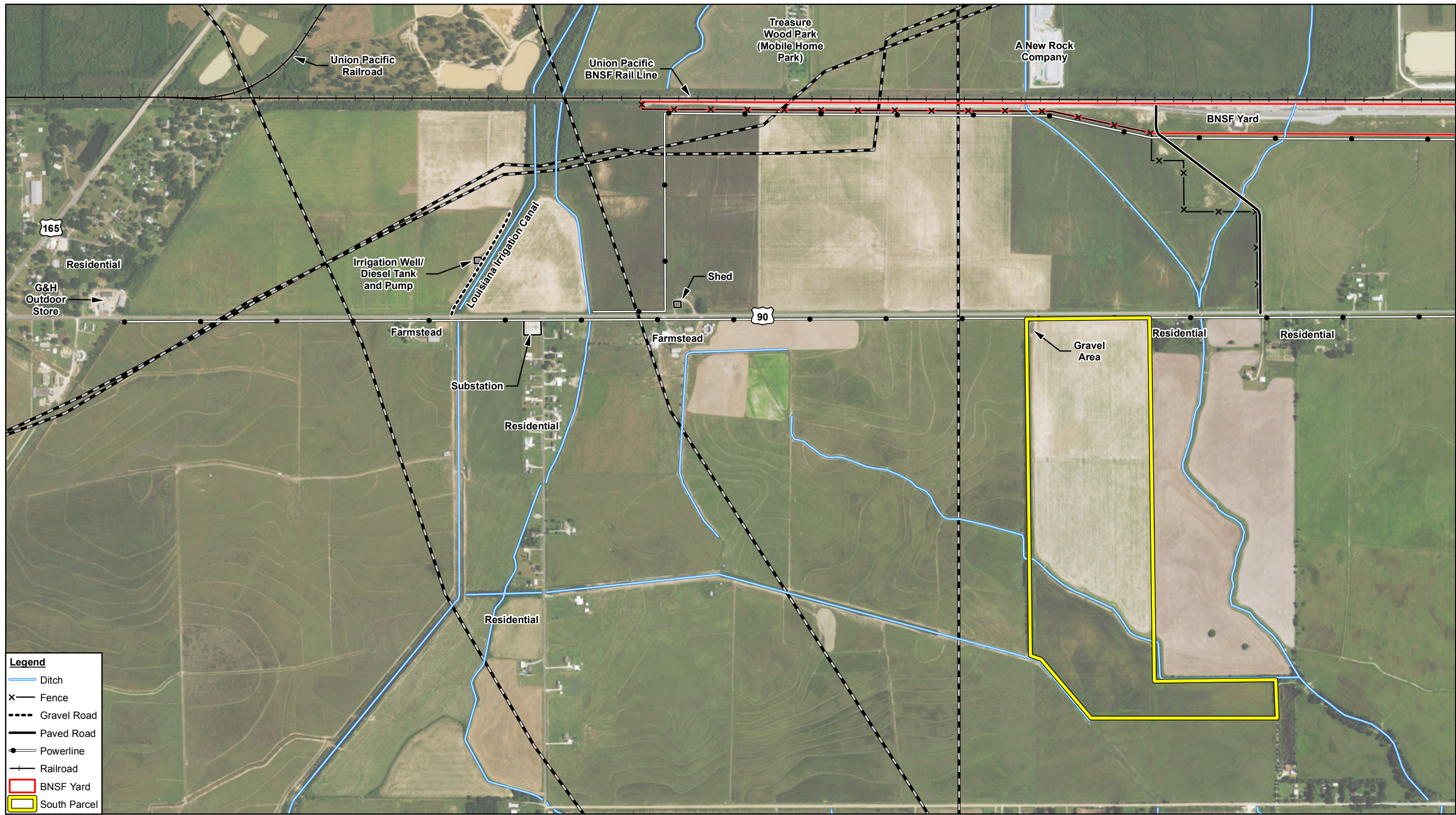


IOWA, LOUISIANA
ALLEN ESTATE - SOUTH PARCEL

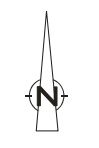
Oct 21, 2016

VICINITY MAP

FIGURE 1



Source: ESRI World Basemap Imagery Service.



Coordinate System:
NAD 1983 UTM Zone 15N



IOWA, LOUISIANA
ALLEN ESTATE - SOUTH PARCEL

SITE MAP

11119657-00
Oct 21, 2016

FIGURE 2