



October 26, 2022

Warren Manufacturing
1008 37th Street North
Birmingham, Alabama

ATTENTION: Russell Warren

SUBJECT: Phase I Environmental Site Assessment Report
1008 37th Street North
Birmingham, Alabama 35234
Project No. 3711-001-01

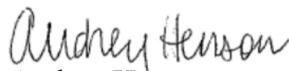
Dear Mr. Warren:


Spectrum Environmental, Inc., (Spectrum) is pleased to provide this Phase I Environmental Site Assessment (Phase I ESA) Report prepared for the above-referenced property. Based on our review of current and historical site data combined with information collected during the site reconnaissance, the following Recognized Environmental Conditions (RECs) were identified:

- The likely use of chlorinated solvents as cleaners in the historical manufacturing operations on the subject property; and
- The historical use of petroleum products, likely stored underground, at the adjoining property to the south and surrounding property to the south-southwest.

Please be aware that according to ASTM Practice E1527-21, this document is generally valid for 180 days, unless changes in site usage have occurred which would impact the environmental conditions of the property. If you have any questions or comments, please contact the undersigned at Spectrum Environmental, Inc. at (205) 664-2000.

Sincerely,
SPECTRUM ENVIRONMENTAL, INC.


Audrey Henson
Staff Scientist


Scott E. Hassler, P.G.
Vice President

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**Phase I Environmental Site Assessment Report
1008 37th Street North
Birmingham, Alabama 35234**

Prepared For:

Warren Manufacturing
1008 37th Street North
Birmingham, Alabama 35234

Report Issuance Date: October 26, 2022

Spectrum Project Number:
3711-001-01

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TABLE OF CONTENTS

Table of Contents	1
1.0 Executive Summary	3
1.1 Property Summary Table	4
1.2 Table of Critical Dates	4
1.2 Conclusions & Recommendation	5
2.0 Introduction.....	6
2.1 Purpose.....	6
2.2 Detailed Scope of Services	7
2.2.1 Records Review	7
2.2.2 Site Reconnaissance.....	8
2.2.3 Interviews.....	9
2.2.4 Evaluation and Report Preparation	9
2.3 Significant Assumptions	9
2.4 Limitations and Exceptions.....	9
2.5 Special Terms and Conditions	10
2.6 User Reliance	10
3.0 Site Description.....	11
3.1 Location and Legal Description.....	11
3.2 Site and Vicinity General Characteristics	11
3.3 Current Use of Property	11
3.4 Descriptions of Structures, Roads, and Other Site Improvements.....	11
3.5 Current Uses of Adjoining Properties.....	11
4.0 User Provided Information	12
4.1 Title and Judicial Records for Environmental Liens and AULs.....	12
4.2 Specialized Knowledge or Experience of the User.....	12
4.3 Valuation Reduction for Environmental Issues	12
4.4 Commonly Known or Reasonably Ascertainable Information.....	12
4.5 Degree of Obviousness	12
4.6 Property Owner, Manager, and/or Occupant Information	12
4.7 Reason for Performing Phase I ESA.....	13
5.0 Records Review	14
5.1 Standard Environmental Record Sources	14
5.1.1 Subject Property.....	14
5.1.2 Surrounding Properties	14
5.1.3 Orphan Sites.....	17
5.2 Additional Environmental Record Sources	17
5.3 Physical Setting Sources	17
5.4 Historical Property Use Information.....	17
5.4.1 Sanborn Fire Insurance Map Review.....	18
5.4.2 Historical Aerial Photographs.....	19
5.4.3 Historical Topographic Maps	20

5.4.4	City Directories.....	20
6.0	Site Reconnaissance.....	22
6.1	Methodology and Limiting Conditions.....	22
6.2	Exterior Observations	22
6.3	Specific Items of Interest	22
6.4	Adjoining Properties	23
7.0	Interviews.....	24
8.0	Non-Scope Services	26
9.0	Vapor Encroachment evaluation.....	27
9.1	Introduction.....	27
9.2	Discussion.....	27
9.3	Findings.....	27
10.0	Opinion	29
10.1	Current and Historical Use of Subject Property	29
10.2	Current and Historical Use of Adjacent Property	30
11.0	Conclusion	32
12.0	Deviations	34
13.0	References.....	35
14.0	Signatures of Environmental Professionals	36
15.0	Qualifications of Environmental Professionals	37
16.0	Appendices.....	39
16.0	Acronyms.....	40

1.0 EXECUTIVE SUMMARY

Spectrum Environmental, Inc. (Spectrum) has prepared this Phase I Environmental Site Assessment (Phase I ESA) report for the property located at 1008 37th Street North in Birmingham, Alabama in accordance with American Society of Testing and Materials (ASTM) Practice E 1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, which Spectrum believes to be in accordance with EPA Standards and Practices for All Appropriate Inquiries (AAI) Regulation listed under 40 CFR Part 312.

The objective of this Phase I ESA was to identify, to the extent feasible, *recognized environmental conditions*¹ (RECs) in connection with the subject property, if any. To accomplish this objective, Spectrum conducted a review of reasonably ascertainable² records (and practically reviewable³), conducted a site reconnaissance, conducted interviews of persons knowledgeable of the site/surrounding areas, and evaluated the data for reporting.

It should be noted that this section is only intended to represent a brief summary of our findings and is not a detailed account of all the information compiled in preparation of this report. The user should review the Phase I in its entirety prior to drawing any final conclusions as to potential environmental conditions associated with the site.

¹ *Recognized Environmental Condition* - (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

² Reasonably ascertainable – Information that is: (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints, and (3) practically reviewable.

³ Practically Reviewable – Means that information provided by the source in a manner and in a form, that, upon examination, yields information relevant to the subject property without the need for extraordinary analysis of irrelevant data.

1.1 Property Summary Table

A summary of the pertinent details of the project is provided below.

Project Summary Table					
Name of Client:	Warren Manufacturing, Inc.	Project Number:	3711-001-01		
Client Contact:	Russell Warren				
Project Description:	Phase I ESA				
Property Name:	Warren Manufacturing				
Property Address:	1008 37 th Street North				
City:	Birmingham	County:	Jefferson	State:	AL
Tax Map Designated Parcel Number:	23 00 19 4 029 007.000				
Property Area (Acres):	±4.09				
Building Area (Square Feet):	±58,353				
Assessor Designated Site Use:	Not Listed				
Year Built:	1954, according to the Jefferson County Tax Parcel Website				
Property Owner:	Warren Manufacturing Inc.				
Assessment Personnel:	Audrey Henson and Scott Hassler				
Accompanied/Escorted By:	Unescorted				
Property Contact:	Terry Thrash and Jack Granger				
Inspection Date:	October 19, 2022				
Weather Conditions:	Sunny and chilly				

1.2 Table of Critical Dates

Table of Critical Dates	
Report Issuance Date	October 26, 2022
Date of Interview of Past and Present Owners and Occupants	October 24, 2022
Date of Recorded Environmental Clean-up Lien Search	-
Date of Government Record Review	October 17, 2022
Date of Visual Inspection of Subject and Adjoining Properties	October 19, 2022
Earliest Date of Interviews, Lien Search, Records Reviews and Inspections	October 17, 2022
Report Viability Date	April 15, 2023

1.2 Conclusions & Recommendation

Spectrum has performed a Phase I Environmental Site Assessment in accordance with the scope and limitations of ASTM Practice E 1527-21 of the subject property. A summary of the findings is provided below.

Recognized Environmental Conditions (REC)⁴
Based on our review of current and historical site data combined with information collected during the site reconnaissance, the following RECs were identified: <ul style="list-style-type: none">• The likely use of chlorinated solvents as cleaners in the historical manufacturing operations on the subject property; and• The historical use of petroleum products, likely stored underground, at the adjoining property to the south and surrounding property to the south-southwest.
Historical Recognized Environmental Conditions (HREC)⁵
Based on our review of current and historical site data, no HRECs were identified in connection with the subject property.
Controlled Recognized Environmental Conditions (CREC)⁶
Based on our review of current and historical site data, no CRECs were identified in connection with the subject property.
Business Environmental Risks (BER)⁷
Based on our review of current and historical site data along with information collected during the site reconnaissance, no BERs were identified.
Recommendations
A limited evaluation of soil and/or groundwater may be prudent in order to establish, based on actual sampling data, that the site has not been impacted by historical site/surrounding area uses, or if impacted, to aid in the development of appropriate investigative and/or corrective actions, as necessary.

⁴ *Recognized Environmental Condition* - (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.

⁵ *Historical Recognized Environmental Condition* - a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). A historical recognized environmental condition is not a recognized environmental condition.

⁶ *Controlled Recognized Environmental Condition* - REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations). Based on our review of current and historical site data, no CRECs were identified in connection with the subject property.

⁷ *Business Environmental Risk* - a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice

2.0 INTRODUCTION

2.1 Purpose

The purpose of this Phase I Environmental Site Assessment (Phase I ESA) is to identify, to the extent feasible pursuant to the processes prescribed in the ASTM, E1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, recognized environmental conditions (RECs) in connection with the property. The term REC means “means (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. A de minimis condition is not a REC.” De minimis conditions is defined as “a condition related to a release 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.”

The Phase I ESA Process is intended to permit a *user* to satisfy one of the requirements to qualify for the *innocent landowner*⁸, *contiguous property owner*⁹, or *bona fide prospective*

⁸ Innocent Landowner Defense: A person may qualify as one of three types of innocent landowners: (1) a person who “did not know and had no reason to know” that contamination existed on the subject property at the time the purchaser acquired the subject property; (2) a government entity which acquired the subject property by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain authority by purchase or condemnation; or (3) a person who “acquired the facility by inheritance or bequest.” To qualify for the innocent landowner defense, such person must have made all appropriate inquiries on or before the date of purchase. Furthermore, the all appropriate inquiries must not have resulted in knowledge of the contamination. If it does, then such person did “know” or “had reason to know” of contamination and would not be eligible for the innocent landowner defense.

⁹ Contiguous Property Owner Liability Protection: A person may qualify for the contiguous property owner liability protection if, among other requirements, such person owns real property that is contiguous to, and that is or may be contaminated by hazardous substances from other real property that is not owned by that person. Furthermore, such person conducted all appropriate inquiries at the time of acquisition of the subject property and did not know or have reason to know that the subject property was or could be contaminated by a release or threatened release from the contiguous property. The all appropriate inquiries must not result in knowledge of contamination. If it does, then such person did “know” or “had reason to know” of contamination and would not be eligible for the contiguous property owner liability protection.

*purchaser*¹⁰ limitations on Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability (*landowner liability protections*).

2.2 Detailed Scope of Services

Spectrum employs a phased approach to site investigations by outlining and completing specific work tasks. A Phase I ESA usually consists of a records review, site reconnaissance, personal interviews, and the generation of a report. Results of the initial Phase I ESA help assess whether further investigations may be necessary.

2.2.1 Records Review

The purpose of the records review is to obtain and review records that will help identify RECs in connection with the property. Accuracy and completeness of record information varies among information sources, including governmental sources. Record information is often inaccurate or incomplete. The user or environmental professional is not obligated to identify mistakes or insufficiencies in information provided. However, the environmental professional reviewing records shall make a reasonable effort to compensate for mistakes or insufficiencies in the information reviewed that are obvious in light of other information of which the environmental professional has actual knowledge. A listing of standard environmental record sources, as described in Table 2 of the ASTM 1527-21 Standard is listed below.

¹⁰ Bona fide prospective purchaser liability protection: A person may qualify as a bona fide prospective purchaser if, among other requirements, such person made “all appropriate inquiries into the previous ownership and uses of the facility in accordance with generally accepted good commercial and customary standards and practices.” Knowledge of contamination resulting from all appropriate inquiries would not generally preclude this liability protection. A person must make all appropriate inquiries on or before the date of purchase. The facility must have been purchased after January 11, 2002.

Types of Government Records to be Reviewed		
Standard Environmental Record Resources (where available)	Common Sources for Government Records	Approximate Minimum Search Distance miles (kilometers)
Lists of Federal <i>NPL</i> (Superfund) sites	U.S. EPA Website and available EPA databases listing currently listed sites	1.0 (1.6)
Lists of Federal Delisted <i>NPL</i> sites	U.S. EPA Website and available EPA databases listing delisted <i>NPL</i> sites	0.5 (0.8)
Lists of Federal sites subject to CERCLA removals and CERCLA orders ^A	U.S. EPA Websites (HQs and Regions)	0.5 (0.8)
Lists of Federal CERCLA sites with NFRAP ^B	U.S. EPA Websites (HQs and Regions)	0.5 (0.8)
Lists of Federal RCRA facilities undergoing Corrective Action	U.S. EPA Website and available EPA databases listing RCRA permitted or interim status facilities undergoing corrective action	1.0 (1.6)
Lists of Federal RCRA TSD facilities ^A	U.S. EPA Website and available EPA databases listing RCRA permitted and interim status facilities	0.5 (0.8)
Lists of Federal RCRA <i>generators</i>	U.S. EPA Website and available EPA databases listing RCRA Generators of hazardous waste	<i>subject property and adjoining properties</i>
Federal <i>institutional control/engineering control registries</i>	U.S. EPA Website and available EPA data bases listing response actions at CERCLA sites; RCRA sites with <i>ICs/ECs</i> , etc.	<i>subject property only</i>
Federal <i>ERNS</i> list	EPA and US Coast Guard websites and data bases;	<i>subject property only</i>
Lists of state- and tribal "Superfund" equivalent sites ^A	Varies by state / tribe	1.0 (1.6)
Lists of state- and tribal hazardous waste facilities	Varies by state / tribe	0.5 (0.8)
Lists of state and tribal <i>landfills and solid waste disposal facilities</i>	Varies by state / tribe	0.5 (0.8)
Lists of state and tribal leaking storage tanks ^A	Varies by state / tribe	0.5 (0.8)
Lists of state and tribal registered storage tanks	Varies by state / tribe	<i>subject property and adjoining properties</i>
State and tribal <i>institutional control/ engineering control registries</i>	Varies by state / tribe	<i>subject property only</i>
Lists of state and tribal voluntary cleanup sites ^A	Varies by state / tribe	0.5 (0.8)
Lists of state and tribal brownfield sites	Varies by state / tribe	0.5 (0.8)

^A Records should be researched for both currently active and formerly active sites.

^B Sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the *NPL*, or the contamination was not serious enough to require Federal Superfund action. This should not be interpreted as there being no contamination at the site or that other regulatory agencies, such as at the State level, have not required further action. Such sites may be listed in other environmental record resources.

Other sources of information that could be reviewed include, but is not limited to, the Alabama Department of Environmental Management (ADEM), the local Fire Department, Planning Department, Building Permits Department, aerial photographs, fire insurance maps, property tax files, recorded land title records, topographic maps, and city directories.

2.2.2 Site Reconnaissance

The objective of the site reconnaissance was to collect information and make observations to help identify RECs in connection with the subject property. A site reconnaissance was conducted by Spectrum personnel experienced in hazardous materials/petroleum product surveys. Surface conditions and current activities on the subject property and on adjoining properties were observed. An inventory of potential contaminant sources on, and adjoining, the subject property was completed based on regulatory agency record reviews and visual observations. Limitations encountered during the site reconnaissance are included in the discussion of the report.

2.2.3 Interviews

The objective of interviews was to obtain information indicating RECs in connection with the property. Interviews with present owner, operators, and/or occupants of the property, where possible, were conducted as part of this Phase I ESA. Other persons potentially interviewed could include state and local government officials, local fire department personnel, local historians, and others that may have specialized knowledge of the site and/or surrounding properties.

2.2.4 Evaluation and Report Preparation

This Phase I ESA report summarizes the findings from the tasks described above. Spectrum has provided a discussion of potential and existing contamination sources, and conclusions regarding our evaluation of the likelihood of contamination on the subject property.

2.3 Significant Assumptions

No significant assumptions were made during the conduct of this Phase I ESA unless otherwise stated.

2.4 Limitations and Exceptions

Spectrum has performed our services for this project in accordance with our agreement, ASTM Practice E 1527-21, and the site-specific requirements provided by client, where applicable. No guarantees are either expressed or implied. The records search was limited to information available from public sources; this information is changing continually and is frequently incomplete. Unless we have actual knowledge to the contrary, all information obtained from interviews or provided to us has been assumed to be correct and complete. Spectrum assumes no liability for findings or conclusions we may draw based on misleading or false information provided to us. Further, we assume no liability for items, conditions, or situations not visible or readily accessible through the application of standard professional care and practice.

There is no investigation that is thorough enough to preclude the presence of materials on the subject property that presently, or in the future, may be considered hazardous. Because regulatory evaluation criteria are constantly changing, concentrations of contaminants present and considered to be acceptable may, in the future, become subject to different regulatory standards and require remediation. Spectrum assumes no liability for findings or conclusions we may draw based on misleading or false information provided to us. Further, we assume no liability for items, conditions, or situations not visible or readily accessible through the application of standard professional care and practice.

2.5 Special Terms and Conditions

There are no special terms and/or conditions pertaining to this Phase I ESA.

2.6 User Reliance

This report is certified to Warren Manufacturing, Inc. Any reliance on this report by other parties shall be at such party's sole risk.

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The subject property encompasses ± 4.09 acres of industrial use land and is located at 1008 37th Street North in Birmingham, Alabama (Figure 1- Appendix A). The property is centered at Latitude 33.537681°N, Longitude -86.787097°W. An aerial view of the subject property is provided as Figure 2 and a tax map is provided as Figure 3.

3.2 Site and Vicinity General Characteristics

The subject property is in a predominately industrial and commercial use area of Birmingham, Alabama. The uses of adjoining properties are listed in Section 3.5 below.

3.3 Current Use of Property

The subject property is currently developed for industrial use and formerly operated as Warren Manufacturing, a truck body manufacturing company. The property was vacant at the time of the site reconnaissance.

3.4 Descriptions of Structures, Roads, and Other Site Improvements

The subject property has been improved with one industrial building (two-story) and one storage building (single-story). A partially enclosed wooden canopy is located at the west end of the property. Rollup bay doors are located on the east side of the industrial building for vehicle access. The remainder of the property predominately consists of gravel, concrete, and asphalt. The property can be accessed from 37th Street North.

3.5 Current Uses of Adjoining Properties

Direction	Use
North	Undeveloped (Former McWane Cast Iron Pipe)/Parking Lot
South	Undeveloped (Former Birmingham Fastener Mfg Plant), then Nucor Steel Tubular Products.
East	Commercial (Warren Truck & Trailer)
West	Undeveloped (Parking Lot); entrance to former McWane Cast Iron Pipe

4.0 USER PROVIDED INFORMATION

A User Questionnaire was completed by Russell Warren (on behalf the User) to assist the environmental professionals evaluate the potential for RECs to be associated with the subject property. A copy of the completed User Questionnaire is provided in Appendix B and a summary of the information provided is discussed below.

4.1 Title and Judicial Records for Environmental Liens and AULs

The User did not identify any environmental liens or AULs in connection with the subject property. Title Records were not provided to Spectrum for review and discussion in this Phase I ESA report.

4.2 Specialized Knowledge or Experience of the User

The User stated that they do not have specialized knowledge of the activities conducted on the subject property.

4.3 Valuation Reduction for Environmental Issues

This Phase I ESA was done prior to the sale of the property via auction and a value has not been established at this time of this report.

4.4 Commonly Known or Reasonably Ascertainable Information

The User is aware of the past uses of the property. However, the User is not aware of any spills or environmental incidents associated with the property.

4.5 Degree of Obviousness

Based on the knowledge and experience related to the subject property, the user indicated that there are no obvious indicators that point to the presence or likely presence of releases at the subject property.

4.6 Property Owner, Manager, and/or Occupant Information

The subject property is owned by Warren Manufacturing Inc and has been assigned Parcel Number 23 00 19 4 029 007.000.

4.7 Reason for Performing Phase I ESA

According to the User, this Phase I ESA has been conducted as part of environmental due diligence and prior to listing the property for sale by auction to identify potential RECs and/or BERs that might exist in connection with the property.

5.0 RECORDS REVIEW

5.1 Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR) conducted a search of available environmental records. The report, dated October 17, 2022, was designed to assist parties seeking to meet the requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-21) or custom requirements developed for the evaluation of environmental risks associated with a parcel of real estate.

EDR's search of available ("reasonably ascertainable") government records on the subject property and within the search radius around the subject property are included in the databases listed on Executive Summary of the database report (Appendix C).

5.1.1 Subject Property

Under the name Warren MFG Inc, Warren Manufacturing Shop, and Warren Truck and Trailer, Inc., the subject property was identified in the FINDS, ECHO, and RCRA VSQG databases. The property is listed in the RCRA database as a Very Small Quantity Generator of hazardous waste in 2013. There are no RCRA violations reported. The FINDS listing is associated with an NPDES permit and enforcement/compliance activity that occurred in 2016. No violations of the Clean Water Act or RCRA were identified in the ECHO database. No other information was obtained from a review of ADEM's [eFile database](#).

5.1.2 Surrounding Properties

Discussion of Groundwater Flow Direction - The position (with respect to the groundwater flow direction) of any site to the subject property is essential in helping evaluate whether or not a site (or contamination associated with a site) represents a recognized environmental condition (REC) to the subject property. Based on our review of site topography, it appears that the target property sits on a topographical high and general groundwater flow direction from the subject property would be generally to the north towards Village Creek.

All sites listed in the database report were reviewed. However, only those sites in close proximity and in an apparent crossgradient/upgradient position relative to the subject property are evaluated in this report. A discussion of the surrounding sites is provided in the table below:

FACILITY	STREET	MILES	DIR.	DATABASE
Thermo King of BHAM	3657 Richard Arrington Jr	0.073	SE	RCRA VSQG, FINDS, ECHO
<p>This site is located approximately 0.073 miles to the southeast and is in an interpreted upgradient position relative to the subject property. The site is listed in the RCRA database as a Very Small Quantity Generator in 2014. There are no RCRA violations reported. <i>Based on this information, specifically the lack of reported violations, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
Mcwane Cast Iron Pipe Facility	3600 10 th Avenue North	0.040	NW	LAST
<p>This site adjoins the subject property to the north and is in an interpreted upgradient to crossgradient position relative to the subject property. The site is listed in the LAST database for a release incident associated with an AST that was reported in January 2012.</p> <p>Spectrum conducted a review of additional information provided in ADEM's eFile database. Based on this review, it appears that the release occurred in 2000. A report was made of a suspect release of diesel fuel. The most recent groundwater sampling data was obtained from a February 2016 Corrective Action Natural Attenuation Groundwater Monitoring Report. ADEM eventually issued No Further Action (NFA) with Conditions in November 2016 based on the results of the February 2016 report. Based on a review of the groundwater sampling results provided in this report, concentrations of fluorene, pyrene, and phenanthrene were detected in the samples collected from the wells closest to the subject property; however, based on a comparison to the May 2022 EPA Regional Screening Level (RSL) Summary Table, these concentrations do not exceed their respective thresholds for tapwater. Shallow groundwater flow at this site was determined to be to the east toward Avondale Creek. <i>Based on a review of the most recent groundwater sampling results, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
Birmingham Fastener Mfg – Plant 1	3624 Richard Arrington Jr Blvd N	0.025	S	RCRA NONGEN
<p>This site adjoins the subject property to the south and is in an interpreted upgradient position relative to the subject property. The site is listed in the RCRA database as a Non-Generator. There are no RCRA violations reported. <i>Based on this information, specifically the lack of reported violations, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
Birmingham Terminal Railway Ensley Car Shop	3400 9 th Avenue	0.156	S	RCRA VSQG
<p>This site is located approximately 0.156 miles to the south and is in an interpreted upgradient position relative to the subject property. The site is listed in the RCRA database as a Very Small Quantity Generator of ignitable waste and lead. The facility was previously classified as a Large Quantity Generator in 2004. RCRA violations were reported in 2003; however, the facility has returned to compliance. <i>Based on this information, specifically the distance from the subject property, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
Action Auto Genl Auto Repr Shop	3700 Richard Arrington Jr Blvd	0.056	SE	EDR HIST AUTO
<p>This site is located approximately 0.056 miles to the southeast and is in an interpreted crossgradient position relative to the subject property. The site is listed in the EDR Historical Auto database as an auto repair shop in 2001. <i>Based on the crossgradient position and results of a previous Phase I ESA conducted by Spectrum in June 2022, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				

FACILITY	STREET	MILES	DIR.	DATABASE
Trackside Gasoline	3619 10 th Ave N	0.065	S	EDR HIST AUTO
<p>This site is located approximately 0.065 miles to the south and is in an interpreted upgradient position relative to the subject property. The site is listed in the EDR Historical Auto database as a gas station in 1961 and 1967. Spectrum was unable to obtain records associated with any USTs at this site. The site also shows up as a gas station in the Sanborn maps for the year 1969. <i>Based on the interpreted upgradient position, distance, and lack of UST documents to confirm a release did not occur, this site is interpreted to represent a REC in connection with the subject property.</i></p>				
USCO Power Equipment	824 36 th Way N	0.204	S	RCRA NONGEN
<p>This site is located approximately 0.204 miles to the south and is in an interpreted upgradient position relative to the subject property. The site is listed in the RCRA database as a Non-Generator and was historically classified as a Conditionally Exempt Small Quantity Generator of ignitable waste in 1991. There are no RCRA violations reported. <i>Based on this information, specifically the distance, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
East Birmingham Bronze Foundry	831 N 36 th Way	0.218	S	RCRA SQG, UST, FINANCIAL ASSURANCE
<p>This site is located approximately 0.218 miles to the south and is in an interpreted upgradient position relative to the subject property. The site is listed in the RCRA database as a Small Quantity Generator of lead. RCRA violations were reported in 1996 and 2000; however, the facility has returned to compliance. Additionally, the site is listed in the UST database for having one 950-gallon gasoline UST. The tank was installed in 1985 and removed in 1993. No closure information was provided in ADEM's eFile database. <i>Based on the distance, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
Green Care Tree & Shrub Service	3708 8 th Ave N	0.233	SE	RCRA NONGEN, UST, FINANCIAL ASSURANCE, RCRA VSQG, FINDS, ECHO
<p>This site is located approximately 0.233 miles to the southeast and is in an interpreted upgradient position relative to the subject property. The site is listed in the RCRA database as a Non-Generator in 1993 and Very Small Quantity Generator of ignitable waste in 1996. There are no RCRA violations reported. Additionally, the site is listed in the UST database for having one 1000-gallon gasoline UST. The tank was installed in 1964 and removed in 1991. Based on a review of the 1991 UST Closure Report obtained from ADEM's eFile database, TPH concentrations in soil ranged 11-22 mg/kg. ADEM issued No Further Action in May 1991. <i>Based on this information, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
Avondale Business Center	720 39 th St N	0.471	SE	LUST, UST, HIST UST, FINANCIAL ASSURANCE
Former Amsouth Operations Building	720 39 th St N	0.471	SE	VCP
<p>This site is located approximately 0.471 miles to the southeast and is in an interpreted upgradient to crossgradient position relative to the subject property. The site is listed in the UST database for having one 10,000-gallon diesel tank and two 15,000-gallon diesel tanks. The 10,000-gallon tank was installed in 1979 and removed in 1992. The other two tanks were installed in 1992 and last used in 2017. The site is also listed in the LUST database for releases that were reported in 1993. Further, the site is listed in the VCP database. Based on a review of soil sampling data provided in the December 2008 VCP Application, a trichloroethylene concentration of 0.010 mg/kg was detected in one of the soil samples. No groundwater sampling data was found for this site. <i>Based on the distance, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				
Goslin-Birmingham MFG	Not Listed	0.402	SSW	FUDS
<p>This site is located approximately 0.402 miles to the south-southwest and is in an interpreted upgradient position relative to the subject property. The site is listed in the FUDS database for the production of 155 mm shells during WWII. No sampling information could be found in ADEM's eFile database. <i>Based on the distance, this site is not interpreted to represent a REC in connection with the subject property.</i></p>				

5.1.3 Orphan Sites

Fourteen Orphan sites were identified in the database report. After further review, it appears that these sites are located over 0.5 miles from the subject property. *Based on the distance from the subject property, none of these sites are interpreted to represent RECs to the subject property.*

5.2 Additional Environmental Record Sources

No additional environmental record sources were reviewed.

5.3 Physical Setting Sources

A USGS topographic map showing the subject property was reviewed and provided in Appendix A - Figure 1. Site-specific physical setting information obtained pursuant to agency file reviews are included in Appendix C. A summary of general site setting information is included in the table below.

Physical Source	Discussion
Property Address	1008 37 th Street N, Birmingham, AL 35234 Latitude (North): 33.537681 Longitude (West): -86.787097
Site Soils Description Reference: USDA NRCS	The subject property consists of urban land.
Site Geology Description Reference: USGS	The near surface geology consists of Ketona Dolomite, which is described as light to medium-gray thick-bedded coarsely crystalline dolomite (Szabo, M.W. et al.).

5.4 Historical Property Use Information

Historical information of the subject and surrounding properties was obtained through a search of readily available and reasonable ascertainable sources that included a review of Sanborn Fire Insurance Maps, historical maps and aerial photographs, and interviews with persons knowledgeable of the site. A discussion of historical information sources is provided below and interviews with persons knowledgeable of the site are provided in Section 7.0 - [Interviews](#).

5.4.1 Sanborn Fire Insurance Map Review

A review of available Fire Insurance Map indexes, as provided by EDR, indicates coverage for the subject property and surrounding area for select years between 1911 and 1969. A copy of this documentation is provided in Appendix D.

Year	Property	Discussion
1911	Subject	The property appears to be improved with several residential buildings, a storage building, an office building, and building marked "CHRPR."
	Adjoining	North: church and residential buildings East: Birmingham Bottleworks West: undeveloped South: Southern Iron & Commission Co Rolling Mill, American Bolt Co
1929	Subject	The property appears to be improved with several residential buildings, a storage building, aboveground fuel oil tanks, and a railroad spur. <i>Since the tanks were aboveground, it is Spectrum's opinion that any release would be visible and would not directly impact soil or groundwater; therefore, the presence of aboveground tanks represents a de minimis condition and not a REC.</i>
	Adjoining	North: residential buildings and an unlabeled manufacturing company with apparent oil storage East: undeveloped West: Goslin Birmingham Mfg Co South: Southern Iron & Commission Co Rolling Mill, American Bolt Co
1950	Subject	The property appears to operate as Virginia Steel Co Inc. A steel fabrication plant is depicted on the property along with a railroad spur and small office buildings. Gas tanks are no longer depicted on the property.
	Adjoining	North: residential buildings and an unlabeled manufacturing company with apparent oil storage East: Dimmick Castings foundry West: undeveloped South: Southern Household Products Co Mfg iron furniture with apparent paint spraying operations
1969	Subject	The property appears to operate as Fontaine Truck Co. Inc and includes a building for the manufacturing of truck bodies, several offices, a shed, and railroad spur.
	Adjoining	North: an unlabeled manufacturing company with apparent oil storage East: Dimmick Castings foundry West: undeveloped South: Southern Household Products Co Mfg iron furniture with a gas tank visible and apparent paint spraying operations. A gas station is depicted on a surrounding property approximately 330 feet to the south-southwest (discussed in Section 5.1.2 as Trackside Gasoline). <i>Based on the interpreted upgradient position and distance from the subject property, it is Spectrum's opinion that the historical use of petroleum products, likely stored underground, at the adjoining property to the south and</i>

Year	Property	Discussion
		<i>surrounding property to the south-southwest is interpreted to represent a REC.</i>

5.4.2 Historical Aerial Photographs

Historical aerial photographs for the subject property were obtained through EDR. The historical photographs are provided in Appendix E. A summary of these photographs is provided below:

Year	Property	Discussion
1941	Subject	The subject property appears to be undeveloped.
	Surrounding	Adjoining properties to the south appear to be developed for industrial use. Adjoining properties to the north appear to be developed for mixed residential/industrial use. Adjoining properties to the east and west appear to be predominately undeveloped.
1947	Subject	The property has not changed significantly from the previous aerial photograph.
	Surrounding	An adjoining property to the east appears to be developed for industrial use.
1951	Subject	The subject property appears to be developed for industrial use and is improved with one large building.
	Surrounding	An adjoining property to the southeast appears to be developed for commercial or industrial use.
1956, 1967	Subject	The subject property has not changed significantly from the previous aerial photograph.
	Surrounding	Adjoining properties to the south appear to be further developed for industrial use. Adjoining residential buildings to the north appear to have been demolished.
1970, 1977, 1981	Subject	The subject property has not changed significantly from the previous aerial photographs.
	Surrounding	Adjoining properties to the east appear to be primarily developed for industrial use.
1988, 1992, 1997, 2006, 2009	Subject	The subject property has not changed significantly from the previous aerial photographs.
	Surrounding	The adjoining property to the west appears to be developed as a parking lot.
2013	Subject	The subject property has not changed significantly from the previous aerial photographs.
	Surrounding	One commercial building is depicted to the south. The adjoining property to the west remains developed as a parking lot, adjoining properties to the north remain developed for industrial use, adjoining properties to the east appear to be developed for mixed commercial/industrial use.
2017	Subject	The subject property remains developed for commercial use.
	Surrounding	Adjoining buildings to the north have been demolished with the exception of one or two commercial buildings.

5.4.3 Historical Topographic Maps

Historical topographic maps for the subject property were obtained through EDR. The historical maps are provided in Appendix F. A summary of these maps is provided below:

Year	Property	Discussion
1889, 1892, 1895	Subject	There are no buildings depicted on the subject property.
	Surrounding	There are no buildings depicted on adjoining properties. Railroads are depicted to the east and west.
1904, 1906, 1907	Subject	Several likely residential buildings are depicted on the property.
	Surrounding	Buildings are depicted on adjoining properties to the north, east, and south. A railroad spur adjoins the property to the south.
1959, 1971, 1975, 1978	Subject	A large likely industrial building is depicted on the property.
	Surrounding	Commercial or industrial buildings are depicted on adjoining properties to the east, south, and north.
1987	Subject	No buildings are depicted on the property.
	Surrounding	No buildings are depicted on adjoining properties.
1997	Subject	No buildings are depicted on the subject property.
	Surrounding	A large industrial building is depicted to the north.
2014, 2018, 2020	Subject	No buildings are depicted on the property.
	Surrounding	No buildings are depicted on adjoining properties.

5.4.4 City Directories

The following information was obtained from a city directory search for the subject property and adjoining property addresses. Based on a review of fire insurance maps, it appears that the subject property address has changed several times. It has previously been listed as 1100-1113 N 39th Street, 1100 N 36th Way, and 1020-1028 N 37th Street on fire insurance maps. City Directory listings were obtained from EDR and are provided in Appendix G.

Year	Property	Listing
1930	Subject	1022 37 th Street N – Residential 1028 37 th Street N – Residential
	Adjoining	South: 3900 10 th Ave N – Southern Steel & Rolling Mill Inc
1935	Subject	1020 37 th Street N – Residential
	Adjoining	West: 3700 10 th Street N – Goslin Bham Mfg Co Inc machy
1946	Subject	Not Listed
	Adjoining	South: 3640 10 th Ave N – Southern Household Products cab mkr
1952, 1956, 1961	Subject	Not Listed
	Adjoining	South: 3640 10 th Ave N – Southern Household Products cab mkr East: 1006 37 th Pl N – Dimick Casting Co
1991	Subject	1008 37 th St N – Warren Manufacturing Inc truck bodies & trailer
	Adjoining	Not Listed

Year	Property	Listing
1994, 1996, 1999	Subject	1008 37th St N – Warren Manufacturing Inc truck bodies & trailer
	Adjoining	South: 3624 10th Ave N – Birmingham Fastener Mfg Inc
2001, 2004	Subject	1008 37th St N – Warren Manufacturing Inc truck bodies & trailer
	Adjoining	East: 3700 Richard Arrington Jr Blvd –auto repr shop South: Birmingham Fastener & Supply Inc
2008	Subject	Not Listed
	Adjoining	East: 3716 Richard Arrington Jr Blvd N – Warren Truck & Trailer Inc
2009	Subject	1008 37th St N – Warren Manufacturing Inc truck bodies & trailer
	Adjoining	East: 3716 Richard Arrington Jr Blvd – Warrant Truck & Trailer Inc

6.0 SITE RECONNAISSANCE

6.1 Methodology and Limiting Conditions

Spectrum personnel (Audrey Henson and Scott Hassler) conducted a visual reconnaissance of the subject property on October 19, 2022. Spectrum personnel walked the property in an attempt to identify potential RECs and/or BERs, if any. There were no limiting conditions preventing Spectrum from assessing the subject property. Photographs of features, activities, uses, and conditions indicative of recognized environmental conditions and de minimis conditions are included in Appendix H.

6.2 Exterior Observations

The subject property is currently vacant and has been improved with one industrial building, one partially enclosed canopy, and one small storage building. Rollup bay doors are located on the east side of the industrial building for vehicle access. The remainder of the property consists of gravel, concrete, and asphalt.

6.3 Specific Items of Interest

In addition to the general observations described above, specific items/areas of interest are discussed below.

Area of Interest	Discussion
USTs	None Observed
ASTs	Two hydraulic oil ASTs were observed in the industrial building. Staining was observed on the floor below the tanks as well as several other areas in the building. Since the staining was observed on concrete floors, it is Spectrum’s opinion that the staining represents a de minimis condition and not a REC.
Drums	One empty 55-gallon drum was observed in the small storage building at the east end.
Drains/Sumps	Floor drains sealed with concrete were observed in the industrial building.
Stained Soil/Stressed Vegetation	None Observed
Water Wells	None Observed
Septic Tanks/Field Lines	None Observed
Electrical Transformers	Pole-mounted transformers were observed at the north end of the property. No stains or leaks were observed.
Solid Wastes	None Observed
Pits, Ponds, and/or Lagoons	None Observed
In-ground Hydraulic Lifts	None Observed
Waste Incineration	None Observed
Chemicals and/or Waste Materials	None Observed
Pipelines	None Observed

6.4 Adjoining Properties

Direction	Use
North	Undeveloped (Former McWane Cast Iron Pipe)/Parking Lot
South	Undeveloped (Former Birmingham Fastener Mfg Plant), then Nucor Steel Tubular Products.
East	Commercial (Warren Truck & Trailer)
West	Undeveloped (Parking Lot); entrance to former McWane Cast Iron Pipe

7.0 INTERVIEWS

Property Owner – Russell Warren

Spectrum interviewed Mr. Russell Warren, the property owner, via phone on October 24, 2022. Mr. Warren stated that he has been familiar with the property since 1978, which is when he first started working on the property. At that time, the property operated as Fontaine Truck Co., a trailer and truck body manufacturing facility. He stated that Fontaine operated on the property from 1961 to 1985. At that time, the property began operating as Warren Manufacturing Co., also a trailer and truck body manufacturing company. Warren Manufacturing Co. operated on the property until 2019. At that time, the property was leased to KT Pacer, a European company that continued to do truck body manufacturing on the property. KT Pacer operated on the property until August 2020, which was when it was vacated. Mr. Warren believes the property was occupied by a steel fabricator prior to Fontaine. He stated that the property is supplied city sewer connection and city water. He believes that the floor drains in the building are connected to city sewer. He is unaware of any USTs or in-ground lifts that were in use on the property. He stated that the two hydraulic oil ASTs that are currently on the property have been there since he started working on the property in 1978. He stated that there was also a 100-gallon diesel AST on the property, but it was removed after 2019. He stated that the truck body manufacturing process involved painting and hydraulic oil was used to put into the truck bodies and trailers. Mr. Warren stated that paint waste and a small amount of transmission fluid was generated during the manufacturing process. A third-party vendor was paid to pick up paint and oil/transmission fluid waste. Chemicals and waste materials were stored inside the building where the two ASTs are currently located. He stated that a cleaner was also used in the process to get welding smoke off of aluminum truck bodies, but this cleaner was considered “environmentally safe” enough for disposal via sewer. He said that this cleaner (name unknown) was used for about 10 years until they decided to use a rag to wipe off the aluminum instead. Mr. Warren stated that the small building at the north side of the property has been used as a bathroom, locker room, and maintenance shop for onsite equipment. He is unaware of any chemicals stored inside the building but believes there may have been some hydraulic oil stored there. Further, Mr. Warren is not aware of any

environmental responses or incidents associated with the subject property other than an electric fire caused by lightning. Finally, Mr. Warren reached out to KT Pacer for a copy of a previous Phase I ESA, but he has not received a response from them.

Birmingham Fire Department

Spectrum left a message with the Birmingham Fire Department on October 24, 2022. As of the issuance date of this report, no response has been received.

8.0 NON-SCOPE SERVICES

No additional services outside the Scope of the Phase I ESA were completed in conjunctions with this report.

9.0 VAPOR ENCROACHMENT EVALUATION

9.1 Introduction

Spectrum conducted a vapor encroachment evaluation as part of this Phase I ESA to identify a Vapor Encroachment Condition¹¹ (VEC) associated with the subject property. Factors considered by Spectrum's Environmental Professional included the following:

- Use of Subject property
- Types of Chemicals of Concern (COC)
- Location(s) of Known/Suspected Contamination
- Soil Characteristics
- Depth to Groundwater
- Vapor Conduits
- Cleanup Status of Contaminated Property(s)

9.2 Discussion

As part of the vapor encroachment evaluation, Spectrum considered the above factors in addition to the anticipated groundwater flow direction and barriers/conduits affecting groundwater flow, if any. The position (with respect to the groundwater flow direction) of any site to the subject property is essential in helping evaluate whether or not a site (or contamination associated with a site) represents a VEC to the subject property. Based on our review of site topography and surface water drainage features, it appears that the groundwater flow direction in the vicinity of the subject property would be toward the north.

9.3 Findings

Based on a review of historical resources, the subject property has been developed for industrial use since at least the early 1950s. At that time, the property was occupied by Virginia Steel Co Inc., a steel manufacturing company. By 1961, the property was occupied by Fontaine Truck Co. Inc, a manufacturer of truck bodies. By 1985, the property was

¹¹ Vapor Encroachment Condition (VEC) — the presence or likely presence of COC vapors in the sub-surface of the subject property (TP) caused by the release of vapors from contaminated soil or groundwater either on or near the TP.

occupied by Warren Manufacturing Inc., a manufacturer of truck bodies. KT Pacer leased the property from 2019 to 2020 and also manufactured truck bodies onsite. The property was vacated by August 2020. Prior to the 1950s, the property was developed for mixed commercial/residential use. Based on a review of the 1911 Sanborn Map, the property was improved with residential buildings, office buildings, and a storage building in 1911. Based on a review of the 1929 Sanborn Map, the property was improved with residential buildings, a storage building, and aboveground fuel oil tanks. Currently, the property is vacant and consists of one industrial building and one storage building.

Based on an interview with the property owner, Spectrum understands that a cleaner was used in the truck body manufacturing process, but it was considered to be safe enough to dispose of down drains that connect to city sewer. The type of cleaner could not be confirmed; however, since truck body manufacturing operations took place on the property as early as 1961, it is likely that chlorinated solvents such as trichloroethylene and tetrachloroethylene were involved in the cleaning process at some period. Further, based on the age of the building, the piping has likely deteriorated over time. It is Spectrum's opinion that the likely use of chlorinated solvents in the manufacturing process is interpreted to represent a REC to the subject property.

The EDR database report identified several surrounding sites, which are discussed in Section 5.1.2. Based on our review of the environmental database report, a reconnaissance of the surrounding properties, and our review of surface water drainage patterns, the historical use of petroleum products, likely stored underground, at the adjoining property to the south and surrounding property to the south-southwest is interpreted to represent a REC to the subject property.

Based on our review of the information presented above, it is our opinion that a VEC to the subject property cannot be ruled out.

10.0 OPINION

Based on the information obtained during the site reconnaissance, records reviews, a review of environmental record sources, and interviews, Spectrum has evaluated current and historical information pertaining to the subject and surrounding properties. Based on these evaluations, opinions regarding conditions observed and the classification of these conditions is presented below. For each condition, Spectrum has classified each as a REC, a historical REC¹², a Controlled REC¹³, or a BER and presents an opinion why the condition is classified as such.

10.1 Current and Historical Use of Subject Property

Based on a review of historical resources, the subject property has been developed for industrial use since at least the early 1950s. At that time, the property was occupied by Virginia Steel Co Inc., a steel manufacturing company. By 1961, the property was occupied by Fontaine Truck Co. Inc, a manufacturer of truck bodies. By 1985, the property was occupied by Warren Manufacturing Inc., a manufacturer of truck bodies. KT Pacer leased the property from 2019 to 2020 and also manufactured truck bodies onsite. The property was vacated by August 2020. Prior to the 1950s, the property was developed for mixed commercial/residential use. Based on a review of the 1911 Sanborn Map, the property was improved with residential buildings, office buildings, and a storage building in 1911. Based on a review of the 1929 Sanborn Map, the property was improved with residential buildings, a storage building, and aboveground fuel oil tanks. Currently, the property is vacant and consists of one industrial building and one storage building.

¹² *Historical Recognized Environmental Condition*—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 (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical recognized environmental condition, the environmental professional must determine whether the past release is a recognized environmental condition at the time the Phase I Environmental Site Assessment is conducted (for example, if there has been a change in the regulatory criteria). If the EP considers the past release to be a recognized environmental condition at the time the Phase I ESA is conducted, the condition shall be included in the conclusions section of the report as a recognized environmental condition.

¹³ *Controlled Recognized Environmental Condition*—A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

During the site reconnaissance, Spectrum identified two hydraulic oil ASTs in the main building. Staining was observed underneath the ASTs and several other areas of the industrial building; however, the staining was considered to be a de minimis condition.

Based on a review of the environmental database report, under the name Warren MFG Inc, Warren Manufacturing Shop, and Warren Truck and Trailer, Inc., the subject property was identified in the FINDS, ECHO, and RCRA VSQG databases. The property is listed in the RCRA database as a Very Small Quantity Generator of hazardous waste in 2013. There are no RCRA violations reported. The FINDS listing is associated with an NPDES permit and enforcement/compliance activity that occurred in 2016. No violations of the Clean Water Act or RCRA were identified in the ECHO database. No other information was obtained from a review of ADEM's eFile website.

Based on an interview with the property owner, Spectrum understands that a cleaner was used in the truck body manufacturing process, but it was considered to be safe enough to dispose of down drains that connect to city sewer. The type of cleaner could not be confirmed; however, since truck body manufacturing operations took place on the property as early as 1961, it is likely that chlorinated solvents such as trichloroethylene and tetrachloroethylene were involved in the cleaning process at some period. Further, based on the age of the building, the piping has likely deteriorated over time. It is Spectrum's opinion that the likely use of chlorinated solvents in the manufacturing process is interpreted to represent a REC to the subject property.

Based on our review of current and historical site data combined with information collected during the site reconnaissance, the likely use of chlorinated solvents as cleaners in the historical manufacturing operations on the subject property is interpreted to represent a recognized environmental condition.

10.2 Current and Historical Use of Adjacent Property

Based on our review of current and historical record resources, adjoining properties were developed for mixed industrial/residential use from at least 1911 until the late 1960s. By

that time, adjoining residential buildings were demolished and the surrounding area was primarily developed for industrial use. Currently, the subject property is adjoining by vacant land to the north, west, and south, and Warren Truck & Trailer to the east.

Based on a review of the 1969 Sanborn Map, a gas station was located on a surrounding property approximately 330 feet to the south-southwest. This site, identified in EDR as Trackage Gasoline, was also identified in the EDR Historical Auto database (discussed in Section 5.1.2) as a gas station in 1961 and 1967. Additionally, a gas tank was depicted on the adjoining property to the south on the 1969 map. No documents associated with the closure of tanks at these sites could be obtained from a review of ADEM's eFile website. *Based on the interpreted upgradient position and distance from the subject property, it is Spectrum's opinion that the historical use of petroleum products, likely stored underground, at the adjoining property to the south and surrounding property to the south-southwest is interpreted to represent a REC.*

The EDR database report identified several surrounding sites, which are discussed in Section 5.1.2. *Based on our review of the environmental database report, a reconnaissance of the surrounding properties, and our review of surface water drainage patterns, the historical use of petroleum products, likely stored underground, at the adjoining property to the south and surrounding property to the south-southwest is interpreted to represent a REC to the subject property.*

11.0 CONCLUSION

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527 for the subject property. Any exceptions to, or deletions from, this practice are described in Section 12.0 – Deviations of this report. Additionally, a Limited Phase II Environmental Site Assessment was conducted at the site. Based on our review of current and historical site data, the following conclusions are presented.

Recognized Environmental Conditions

A recognized environmental condition (REC), as defined in the ASTM Standard, means (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. *Based on our review of current and historical site data combined with information collected during the site reconnaissance, the following RECs were identified:*

- *The likely use of chlorinated solvents as cleaners in the historical manufacturing operations on the subject property; and*
- *The historical use of petroleum products, likely stored underground, at the adjoining property to the south and surrounding property to the south-southwest.*

Historical Recognized Environmental Conditions

A historical recognized environmental condition (HREC), as defined in the ASTM Standard, a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). A historical

recognized environmental condition is not a recognized environmental condition. *Based on our review of current and historical site data, no HRECs were identified in connection with the subject property.*

Controlled Recognized Environmental Conditions

A controlled recognized environmental condition (CREC), as defined in the ASTM Standard, is a REC affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations). Based on our review of current and historical site data, no CRECs were identified in connection with the subject property. *Based on our review of current and historical site data, no CRECs were identified in connection with the subject property.*

Business Environmental Risks

A business environmental risk (BER), as defined in the ASTM Standard, is a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice. *Based on our review of current and historical site data, no BERs were identified in connection with the subject property.*

Recommendations

A limited evaluation of soil and/or groundwater may be prudent in order to establish, based on actual sampling data, that the site has not been impacted by historical site/surrounding area uses, or if impacted, to aid in the development of appropriate investigative and/or corrective actions, as necessary.

12.0 DEVIATIONS

Historical information regarding the subject site has been obtained through the use of historical topographic maps, aerial photographs and interviews with individuals cognizant of the site. The earliest photograph that was readily available and reviewed was an 1889 topographic map. Based on our review of historical site data, the historical use of the property could not be evaluated on 5-year increments back to the first developed use. However, the data gaps in the historical review were not during times of significant change on the subject property. As such, it is not believed that this lack of readily available or reasonable ascertainable data represents a significant data gap that would lead to the identification of additional RECs or BERs on the subject property.

13.0 REFERENCES

40 CFR Part 312 – Innocent Landowners, Standard for Conducting All Appropriate Inquiry.

American Society of Testing and Materials (ASTM), Practice E 1527-21. Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

EDR Database Report dated October 17, 2022.

EDR Fire Insurance Map Report dated October 17, 2022.

EDR Historical Aerial Photograph Report, dated October 17, 2022.

EDR Historical Topographic Map Report, dated October 17, 2022.

EDR City Directory Report, dated October 18, 2022.

Szabo, M. W., Osborne, E. W., Copeland, C. W. Jr., Neathery; T. L., 1988, Geologic Map of Alabama, Geological Survey of Alabama Special Map 220, scale 1:250,000.

14.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that to the best of our professional knowledge and belief, we meet the definition of Environmental Professional¹⁴, responsible for conducting the Phase I Environmental Site Assessment and preparation of the report, as defined in §312.10 of 40 CFR Part §312. We have the 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 all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.


Spectrum Environmental, Inc.



Scott E. Hassler, P.G.
Vice President

¹⁴ Environmental Professional – (1) a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases on, at, in, or to a property, sufficient to meet the objectives and performance factors in §312.20(e) and (f). (2) Such a person must (i) hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory and have the equivalent of three years full-time relevant experience; or be licensed/certified by the Federal government, a state, tribe, and U.S. Territory to perform environmental inquiries as defined in §312.21 and have the equivalent of three years full-time relevant experience; or have a baccalaureate or higher degree from an accredited institution from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five years of full time relevant experience; or have the equivalent of ten years of full time relevant experience.

15.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS



SPECTRUM
Solutions to Your Environmental Challenges

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<p>Areas of Expertise</p> <ul style="list-style-type: none">• Management and Coordination• Technical Oversight• Contamination Assessments• Environmental Assessments, Brownfield, and VCP• Regulatory Compliance Analysis & Planning• Hazardous Material Management Program Development, Implementation & Training• NPDES & SID Permitting Technical Assistance• Stormwater Management Services Implementation & Training• Expert Testimony	<p>Overview</p> <p>Mr. Hassler is a graduate of the University of North Carolina-Wilmington with a BS degree in Geology. He also holds a Master's degree in Geology from the University of Alabama. With more than 24 years of diverse experience, Mr. Hassler specializes in environmental site assessments, contamination assessments, environmental audits, industrial and construction stormwater compliance and Brownfield redevelopment. Scott has been employed with Spectrum since 1996.</p> <p>In addition to technical oversight of the group, Mr. Hassler is responsible for the overall development of Spectrum's staff, technical review of various work products, client coordination and management, preparation of annual budgets, accounting reviews.</p> <p>Mr. Hassler is a Licensed Professional Geologist in the State of Alabama and was issued license number ALPG #409.</p> <p>Areas of Involvement/Responsibility</p> <ul style="list-style-type: none">• Technical Oversight of environmental site assessments/facility siting projects;• Phase I and II Property evaluations for Real Estate Transactions and Development• Brownfield and VCP site assessment and coordination;• NPDES and SID Permitting-Technical Assistance• Stormwater Management Services including: Permitting, Implementation, Sampling and Training;• Best Management Practices (BMP) and Spill Prevention Control and Countermeasure (SPCC) Plan Development and Implementation;• Waste management and tracking program development;• Underground Storage Tank (UST) Assessment and Remediation;• Expert Witness Testimony and Technical Case Preparation Services;• Regulatory Compliance Analysis and Planning, and• HAZCOM Program Development, Implementation and Training.
<p>Years of Experience <i>With Spectrum:</i> 24 years <i>With Other Firms:</i> 4 years</p>	
<p>Education 1990 – BS Geology, UNCW 1992 – MS Geology, U. of Alabama</p>	

Scott E. Hassler, P.G. (continued)

Page 2 of 2

Significant Achievements / Projects

- Site Manager/Geologist - Phase I Environmental Site Assessment, Cleveland, Mississippi. During the Phase I, Scott discovered the site was previously used for the manufacture of pesticides; including DDT and Toxaphene. Scott prepared work plans to assess the site in phases, then coordinated and provided oversight of the plan implementation. Activities included collection of soil samples and the installation of Type II & Type III groundwater monitoring wells.
- Site Manager/Geologist - Pesticide release response to the burial of drums containing Lindane. Scott managed the initial source area investigation and source area excavation. Responsibilities included material characterization & profiling and coordination of the transportation & disposal of the excavated material. Subsequently, Scott worked with the MDEQ in preparing and implementation of groundwater quality assessment work plans. During the course of investigative actions, Type II well, double-cased wells (Type III) and triple cased wells were installed and sampled. Scott designed and implemented a hydrogeological assessment of the site including slug testing, aquifer testing, and the evaluation/reporting of the data. Scott designed and managed the installation of the groundwater treatment system still in operation at the site.
- Alternate Project Coordinator, USEPA Site. Responsible for the preparation of preliminary work plans for review & approval by the client & the EPA. With EPA approval, Scott provided primary oversight of field activities in addition to soil and groundwater sampling. Direct push, hollow-stem, & air rotary drilling techniques utilized for the collection of soil samples and the installation of peizometers, Type II wells, and Type III wells. Scott also designed & implemented slug and aquifer testing appropriate for a Karst terrain. Upon completion of field activities, Scott was responsible for the reporting of the data to client and Federal Environmental Agencies.
- Environmental Professional and senior reviewer for Phase I Environmental Site Assessments for national client. These Phase I ESA Reports must be compliance with current ASTM standards (ASTM E1527-13 and other various State and/or Federal Requirements (HUD, Rural Development, R.A.D, and state housing authority guidelines). Additionally, many of these projects also include ASTM non-scope considerations that testing for ACM, LBP, radon, as well as other reviews that go beyond that required under ASTM E1527-13.
- Project Liason for national client with hundreds of properties across the U.S. Duties include coordinating EP Desktop Reviews, Phase I ESAs, and other needs as required (environmental permitting, preparation of BMP/SWPPP Plans, contamination assessments, and coordination with regulatory authorities).

Community Involvement

2012-Present – Chairman of the Board of Adjustments, City of Helena, Alabama.

2015-Present – Member of YMCA Board – Shelby County (Pelham) YMCA.

16.0 APPENDICES

The following appendices are included and attached to this report:

Appendix A: Figures

Appendix B: User Questionnaire

Appendix C: Regulatory Records Documentation (Computer Database Report)

Appendix D: Sanborn Fire Insurance Map Report

Appendix E: Historical Aerial Photographs

Appendix F: Historical Topographic Maps

Appendix G: City Directories

Appendix H: Site Reconnaissance Photographs

16.0 ACRONYMS

Acronym	Full Name
ADEM	Alabama Department of Environmental Management
AST	Aboveground Storage Tank
ASTM	American Society of Testing and Materials
AUL	Activity Use Limitation
BER	Business Environmental Risk
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CREC	Controlled Recognized Environmental Condition
ECHO	Enforcement and Compliance History Online
EDR	Environmental Data Resources, Inc.
FINDS	Facility Index System
HREC	Historical Recognized Environmental Condition
LUST	Leaking Underground Storage Tank
Phase I ESA	Phase I Environmental Site Assessment
RCRA	Resource Conservations and Recovery Act
REC	Recognized Environmental Condition
Spectrum	Spectrum Environmental, Inc.
UST	Underground Storage Tank
VSQG	Very Small Quantity Generator