



**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

0 E. Commercial Row
Reno, Nevada, 89512
(APN: 008-370-33)

Prepared for:

Nevada Division of Environmental Protection-Brownfields Program
Attn: Mr. David Friedman
901 S. Stewart St., Suite 4001
Carson City, NV 89701
Task BC03-19
Category 54
Organizational Code 5429
Job Number 6681717

Prepared by:

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Nevada Division of Environmental Protection-Brownfields Program
901 S. Stewart St., Suite 4001
Carson City, NV 89701

Attn: Mr. David Friedman

RE: Phase I Environmental Site Assessment, 0 E. Commercial Row, (APN: 008-370-33), Reno, Nevada 89512.

Dear Mr. Friedman:

Attached is the report titled *Phase I Environmental Site Assessment, 0 E. Commercial Row, (APN: 008-370-33), Reno, Nevada 89512*. This report includes a description of activities performed and results obtained from the investigation.

Should you have questions regarding the work performed or results obtained, please do not hesitate to contact us.

Sincerely,

BROADBENT & ASSOCIATES, INC.



Brandon Reiff, PG, CEM #2300 (exp. 3/23/20)
Senior Geologist

Enclosure: Phase I Environmental Site Assessment

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List of Commonly Used Acronyms

AAI – All Appropriate Inquiries
APN – Assessor’s Parcel Number
AST – Aboveground Storage Tank
ASTM – ASTM International
Broadbent – Broadbent & Associates, Inc.
CDL – Clandestine Drug Laboratory
CERCLA – Comprehensive Environmental Response, Compensation, and Liability Act
CFR – Code of Federal Regulations
CREC – Controlled Recognized Environmental Condition
EDR – Environmental Data Resources
EMI – Emissions Inventory Data
EPA – United States Environmental Protection Agency
ESA – Environmental Site Assessment
FID – Facility Inventory Database
FINDS – Facility Index System
FIFRA – Federal Insecticide, Fungicide and Rodenticide Act
HAZNET – Hazardous Waste Facility & Manifest Database
HREC – Historical Recognized Environmental Condition
LF – Landfill
LUST – Leaking Underground Storage Tank
NAL – Nevada Action Limit
NPL – National Priorities List
NDEP – Nevada Division of Environmental Protection
PCB – Polychlorinated-biphenyls
PCE - Perchloroethylene
ppb – Parts per billion
ppm – Parts per million
PVC – polyvinyl chloride
RCRA – Resource Conservation & Recovery Act
RCRIS – Resource Conservation & Recovery Act Information System
RDA – Redevelopment Agency
REC – Recognized Environmental Condition
SARA – Superfund Amendments and Reauthorization Act
SLIC – Spills, Leaks, and Investigation Cleanups
SCS – Soil Conservation Service
SWEEPS – Statewide Environmental Evaluation and Planning System
SWF – Solid Waste Facility
SWRCY – Solid Waste Recycler Database
TSCA – Toxic Substances Control Act
USDA – United States Department of Agriculture
USGS – United States Geological Survey
UST – Underground Storage Tank

Executive Summary

To assist the City of Reno with their due diligence efforts, Broadbent & Associates, Inc. (Broadbent) has conducted this Phase I Environmental Site Assessment (ESA) on the real property located at 0 E. Commercial Row (APN 008-370-33), Reno, Nevada, 89512. This ESA was conducted in conformance with the scope and limitations of ASTM Practice E1527-13: *Standard Practice for Environmental Site Assessments – Phase I Environmental Site Assessment Process*, and the United States Environmental Protection Agency (EPA) final rule contained within Code of Federal Regulations Volume 40 Part 312 – *Standards and Practices for All Appropriate Inquiries*. Exceptions to, or deletions from, this practice are described in Section 1 of this report. Use of the referenced ASTM Process is intended to satisfy requirements for conducting “all appropriate inquiries” (AAI) under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

This ESA has revealed evidence of the following RECs associated with the Property:

- The Property overlies a regional plume of perchloroethylene (PCE) in groundwater. Adjacent facilities located in proximity of the Property have created PCE impacts to groundwater underlying the Property. The impacted groundwater is within the containment boundary monitored by the Central Truckee Meadows Remediation District. As of the date of this report, remedial action and/or monitoring are being conducted by applicable responsible party(s) and all indications are that this will continue until case closure is granted.
- Following remedial actions, residual petroleum impacts to soil was noted on the Property.
- Based on the observations and analytical results of remediation of petroleum hydrocarbon impacted soil, groundwater may be impacted below the area of remedial excavation.
- The soil and groundwater beneath and in vicinity of the former excavation on the Property has not been fully assessed. As stated in the NDEP’s memo dated February 27, 2006 from Mr. Joe Sawyer (NDEP), *“contaminated soil outside of the construction zone was not delineated or removed. Accordingly, no confirmation samples were collected, and regional contamination may remain in these areas. Additional remediation was outside the scope of this effort and was not required.”*

Section 1: Introduction

This section describes the purpose of and authorization for conducting this assessment. Also discussed are significant assumptions, deviations, special terms and conditions, and user reliance on this report.

1.1 Purpose

To assist the City of Reno with their due diligence efforts relative to the site located at 0 E. Commercial Row, (APN: 008-370-33) in Reno, NV (Property), Broadbent & Associates, Inc. (Broadbent) conducted an All Appropriate Inquiry Phase I Environmental Site Assessment (ESA) consistent with the ASTM International Standard E1527-13: *Standard Practice for Environmental Site Assessments – Phase I Environmental Site Assessment Process*, and the United States Environmental Protection Agency (EPA) final rule contained within Code of Federal Regulations (CFR) Volume 40 Part 312 – *Standards and Practices for All Appropriate Inquiries* (AAI). The purpose of this due diligence investigation is to identify recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), historical recognized environmental conditions (HRECs), and/or *de minimis* conditions as defined below.

A REC is defined by ASTM International as:

“The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions.”

A HREC is defined by ASTM International as:

“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).”

A CREC is defined by ASTM International as:

“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).”

A *De Minimis* Condition is defined by ASTM International as:

“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 recognized environmental conditions nor controlled recognized environmental conditions.”

1.2 Scope of Work

Various investigative methods were utilized to complete this ESA. Specific items accomplished include the following:

- Prepared a general site description
- Reviewed User-provided information
- Reviewed readily ascertainable environmental records
- Conducted a site reconnaissance
- Conducted interviews
- Identified data gaps (if present)
- Prepared this ESA report summarizing assessment results

1.3 Significant Assumptions

Conclusions stated in this report are based upon observations made by employees of Broadbent and also upon information provided by others. It is assumed that these observations and information are accurate. However, Broadbent cannot be held responsible for the accuracy of the information provided by others. The scope of this ESA does not purport to encompass every report, record, or other form of documentation relevant to the Property being evaluated.

1.4 Deviations

There were no deviations from the ASTM International standards.

1.5 Special Terms and Conditions

Observations contained within this assessment are based upon Property conditions readily visible and present at the time of the site reconnaissance. These Property observations are unable to specifically identify conditions of potential mold, asbestos containing building materials, subsurface soil, groundwater, vapor, or underground storage tanks, unless specifically mentioned. This ESA does not attempt to address the unidentified past or forecast future Property conditions.

1.6 Reliance

The enclosed ESA has been conducted for the exclusive use of the City of Reno and NDEP and may not be reproduced, distributed, or relied upon by others without the prior written authorization of NDEP and Broadbent. A Reliance Letter can be prepared for additional use upon request by NDEP.

Section 2: Site Description

This section describes the Property with its location and legal description, general vicinity characteristics, current uses, description of on-site improvements, and current uses of adjoining properties.

2.1 Location and Legal Description

The Property is located adjacent east of downtown Reno, NV. The Property's current physical address is 0 E. Commercial Row, Reno, NV. The Property consists of one parcel assigned the Washoe County Assessor's Parcel Number 008-370-33. A copy of the Washoe County Assessor's Parcel Map for the Property is provided in Appendix A.

Approximate latitude and longitude coordinates for the center of the Property are 39.530532 North, -119.801559 West NAD83. The Property is located within the northwest quarter of Section 12, Township 19 North, Range 19 East, relative to the Mount Diablo Baseline and Meridian. The Property is covered by the United States Geological Survey (USGS) 6723545 Reno, NV 7.5-minute quadrangle topographic map. A Site Location and Property Location Map are provided as Figures 1 and 2, respectively.

2.2 Current Uses of the Site

The Property is currently a vacant industrial lot. The Property vicinity includes the Truckee River, Union Pacific Railroad, and general industrial area east of downtown Reno.

No RECs, CRECs, and/or HRECs were noted relative to the Property based on review of current uses of the Property.

2.3 Description of Structures, Roads, and Other Improvements

The Property is a vacant industrial lot with no building structures. Additional Property information is provided in the table below.

Size of Property (approximate)	According to the Washoe County Assessor, the approximate size of parcel 008-370-33 is 0.6 acres.
General Topography of Property	The Property has a gradual downward slope to the east-southeast.
Adjoining and/or Access/Egress Roads	The Property is accessible by entrances/exits on the south side of the Property via E. Commercial Row.
Paved or Concrete Areas (including parking)	A former building concrete pad was observed on the eastern portion of the Property.
Unimproved Areas	There are no known unimproved areas.
Landscaped Areas	No landscaped areas were observed on the Property.
Surface Water	The Truckee River is approximately 150 feet south of the Property.
Potable Water Source	Truckee Meadows Water Authority
Sanitary Sewer Utility	Washoe County

Storm Sewer Utility	Washoe County
Electrical Utility	NV Energy
Natural Gas Utility	NV Energy

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of structures, roads and other improvements to the Property.

2.4 Current Uses of Adjoining Properties

Adjoining properties are used for various purposes. Uses of adjoining properties at the time of this investigation are the following:

<i>Direction</i>	<i>Address</i>	<i>Use & Occupant</i>	<i>Comments</i>
North	N/A	Union Pacific Railroad	None
South	N/A N/A 990 E Morrill Ave. 1010 E Commercial Row	Truckee River E. Commercial Row Municipal Water Pump Facility BayStone	None Public thoroughfare APN: 008-370-21 APN: 008-370-22
West	0 E. Commercial Row	Vacant Lot	APN: 011-450-24
East	0 E Commercial Row 1035 E Commercial Row	Vacant Lot Vacant Warehouse	APN: 008-370-34 APN: 008-370-20

RECs and HRECs were identified relative to the Property based on review of current uses of adjoining properties. According to the EDR report, the adjacent site (1010 E Commercial Row) identified as Basta Investment Company, LLC had a release of diesel that affected soil at the site on March 30, 2017. The site was granted closure on March 7, 2018 by WCHD.

A second adjacent site (310 N. Park St.) identified as Desert Glass/Nevada Forklift (ReTrac Project) had a release of petroleum hydrocarbon that affected soil at the site on November 7, 2005. The site was granted closure on March 9, 2006 by the NDEP.

The adjacent site to the west of the Property identified as Western Sealing & Striping (APN: 011-450-24) had a petroleum hydrocarbon release on July 9, 2003 where soil was impacted. The site was granted closure by the NDEP on October 17, 2006. The site had another petroleum hydrocarbon release on April 23, 2008 that impacted soil and groundwater. As a result of these petroleum hydrocarbon impacts on the site the City of Reno – Redevelopment Agency submitted a Voluntary Cleanup Program (VCP) Enrollment Application dated April 23, 2008 to the NDEP. The NDEP approved enrollment of the Property into the VCP in their letter dated July 2, 2008. The VCP status of the site is currently listed as “active.” Additional information on the historic releases are provided in section 4.5.

Section 3: User-Provided Information

The purpose of this section is to detail User-provided information used to help identify the possibility of RECs in connection with the Property. A User Questionnaire was provided to the User to assist them in compiling pertinent information. User-provided information is summarized below.

3.1 Owner, Key Property Manager, or Occupant Provided Information

According to Washoe County Assessor Data, the Property is owned by the City of Reno. The Property is currently a vacant industrial lot.

3.2 Title Records, Environmental Liens or Activity and Use Limitations

Reasonably ascertainable recorded land title records should be checked by the User to identify environmental liens or activity and use limitations, if currently recorded against the Property. Environmental liens or activity and use limitations so identified are supposed to be reported to the Environmental Professional conducting the ESA. No evidence of environmental liens or activity and/or use limitations was discovered or brought to the attention of Broadbent.

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of title records, environmental liens, or activity and use limitations.

3.3 Specialized Knowledge

If the User has or is aware of any specialized knowledge or experience that is material to RECs in connection with the Property, it is the User's responsibility to communicate this information to the Environmental Professional. If the User has or is aware of any specialized knowledge or experience that is material to RECs in connection with the Property, it is the User's responsibility to communicate this information to the Environmental Professional. For the ESA documented herein, the User provided knowledge that the Property and the adjacent parcel (APN 011-450-24) west of the Property have undergone several Phase I/II environmental assessments. Ms. Lori Miles (Property Manager for the City of Reno) provided a Phase I Environmental Site Assessment Report dated January 22, 2008 (ESA 2008). The ESA 2008 report was performed by AMEC Earth & Environmental, Inc. (AMEC) on the adjacent parcel west of the Property. AMEC found evidence of recognized environmental conditions during their assessment. The findings of the Phase I ESA 2008 include evidence of the following RECs associated with the adjacent parcel west of the Property:

- The site overlies a regional plume of perchloroethylene (PCE) in groundwater. The site does not appear to have contributed to the plume.
- Following remedial actions, residual petroleum in soil was noted in multiple locations and at various depths.
- Based on the observations and analytical results of remediation of the tar pit and the oil pit, groundwater may be impacted below the area of remedial excavation.
- Groundwater at a former boring (B-29) of 2000 was reported as impacted by chloroform.
- A variety of unidentified chemicals may be present beneath the remaining foundations due to the presence of multiple floor drains and to the documented spillage in 2003 of chemicals within the former warehouse on the site.

- The soil and groundwater beneath the former leachfield has not been fully assessed

Further discussion of ESA 2008 Report findings are provided in Section 4.5 of this ESA.

3.4 Valuation Reduction for Environmental Issues

In a transaction involving the purchase of a parcel of real estate, if a User has actual knowledge that the purchase price of the Property is significantly less than the purchase price of comparable properties, the User should try to identify an explanation for the lower price and to make a written record of such explanation. User provided no information relative to valuation reduction relative to the Property.

No RECs, CRECs, and/or HRECs were noted relative to the Property based on review of information relative to valuation reduction for environmental issues.

3.5 Reason for Conducting Phase I

The purpose of this ESA was to identify existing or potential RECs, CRECs, and/or HRECs (as defined by ASTM Standard E1527-13) in connection with the Property, and it is assumed to also be to qualify the User for Landowner Liability Protection (LLP) relative to potential CERCLA liability.

Section 4: Records Review

The purpose of a Records Review is to obtain and review records that will help identify RECs, CRECs, and/or HRECs in connection with the Property. A discussion of each record source is provided below.

4.1 Physical Setting

Physical setting information for the Property was obtained by a review of sources that included, but was not limited to, USGS topographic maps and a USDA soil survey report.

4.1.1 *Topography*

The USGS, 6723545 Reno, NV Quadrangle 7.5-Minute series topographic map was reviewed for this ESA. According to the contour lines on the topographic map, the Property is located at an approximate elevation of 4,474 ft above mean sea level. The contour lines in vicinity of the Property indicate the area has a gradual downward slope to the east-southeast.

4.1.2 *Surface Water Bodies*

The Truckee River is approximately 150 feet south of the Property. No on-site water wells or springs were observed during the Property reconnaissance. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins were observed on the Property during this investigation.

4.1.3 *Geology and Hydrology*

The Property is located in eastern downtown Reno, NV. The geological deposits of this area are described by the USGS as stratified sequences of quaternary alluvium. Based on the soil survey maps published by the USDA Soil Conservation Service (SCS), the Property is predominately mapped as "Oest" which is gravelly sandy loam soil texture. The Property soil hydrologic group classification is Class B – Moderate infiltration rates. Class B soils are "deep and moderately deep, moderately well and well drained soils with moderately coarse textures."

The groundwater flow direction in the vicinity of the Property is assumed to be toward the south based on surface topography and proximity to the river. Depth to groundwater is expected to be approximately 15-35 feet below land surface (BLS) in the area near and beneath the Property, according to the Nevada Division of Water Resources on-line Well Log Database.

4.2 Environmental Record Sources

Broadbent contracted Environmental Data Resources, Inc. (EDR) to conduct a search of available state, federal, and other ascertainable environmental records. The area searched included the Property and surrounding area within approximate minimum search distances from the Property boundary, dependent on listing type, as defined by ASTM International. A complete listing of records searched is available in the EDR Radius Report provided in Appendix C. An abbreviated list of search results is provided in the table below relative to records that identified a regulatory listing relevant to the Property. A subsequent discussion is provided relative to identified potential concerns.

<i>Standard Database List Per ASTM International</i>	<i>Database Date (M/D/Y)</i>	<i>Subject Property Listed (Y or N)</i>	<i>Total No. of Listings</i>	<i>Environmental Concern Posed to the Subject Property (Y or N)</i>
Federal Agencies				
Federal NPL Sites (<1.0 mile)	11/14/18	N	0	N
Federal Delisted NPL Sites (<1.0 mile)	11/14/18	N	0	N
Federal SEMS Sites (< 0.5 mile)	11/14/18	N	0	N
Federal CERCLIS NFRAP Sites (<0.5 mile)	11/14/18	N	0	N
RCRA CORRACTS Sites (<1.0 mile)	3/1/18	N	0	N
RCRA non-CORRACTS TSD Facilities (< 0.5 mile)	3/1/18	N	0	N
RCRA LQG (<0.25 mile)	3/1/18	N	0	N
RCRA SQG (<0.25 mile)	3/1/18	N	0	N
RCRA CESQG (<0.25 mile)	3/1/18	N	5	N
Federal ERNS Sites (Property Only)	9/24/18	N	0	N
US Institutional/Engineering Controls (<0.5 mile)	7/31/18	N	0	N
State Agencies				
State & Tribal equivalent CERCLIS (SHWS) (<1.0 mile)	9/18/18	N	158	N
State & Tribal SWF/LF (<0.5 mile)	8/27/18	N	0	N
State & Tribal LUST (<0.5 mile)	9/18/18	N	3	N
State & Tribal ASTs (<0.25 mile)	1/25/18	N	3	N
State & Tribal USTs (<0.25 mile)	1/25/18	N	28	N
State & Tribal Voluntary Cleanup Sites (<0.5 mile)	9/18/18	N	1	N
State & Tribal Brownfield Sites (<0.5 mile)	9/18/18	N	3	N
Other Ascertainable Records				
US Brownfields (<0.5 mile)	9/18/18	N	16	N
Recycling Facilities in Nevada (SWRCY) (<0.5 mile)	10/12/18	N	9	N
RCRA-NonGen (<0.25)	3/1/18	N	32	N
Facility Index System/Facility Registry System (FINDS) (Property Only)	8/7/18	N	N/A	N/A
EDR Exclusive				
EDR US Historic Auto Station (<0.125 mile)	NA	N	3	N
EDR US Historic Dry Cleaners (<0.125 mile)	NA	N	0	N
EDR US Manufactured Gas Plants (<0.25 mile)	NA	N	2	N

Based on information contained within the EDR report, the Property was not listed in any of the databases that were searched. Database results for properties surrounding the target property are discussed below.

Results of the records search found 158 sites located within one mile of the Property listed on the Corrective Action Sites (SHWS) database. Twelve of these SHWS sites are within 0.25 miles of the Property. These twelve sites were identified as petroleum hydrocarbon releases affecting soil and/or groundwater. Each of the sites, with exception of one site have been granted closure by the appropriate agency. The nearest “open” site is identified as City of Reno-Redevelopment Agency, 111 Morrill Ave. APN 011-450-24. As discussed in Section 3.3 this site is the former Western Sealing & Striping facility located adjacent west of the Property. This site was identified twice on the SHWS database. Based on information contained within the EDR Report, the site was first enrolled into the SHWS database on July 9, 2003 for a petroleum hydrocarbon release where soil was impacted. The site was granted closure by the NDEP on October 17, 2006. The site was again enrolled into the SHWS database on April 23, 2008 for a petroleum hydrocarbon release that impacted soil and groundwater. As a result of these petroleum hydrocarbon impacts on the Property the City of Reno – Redevelopment Agency submitted a Voluntary Cleanup Program (VCP) Enrollment Application dated April 23, 2008 to the NDEP. The NDEP approved enrollment of the Property into the VCP in their letter dated July 2, 2008. The VCP provides relief from liability to owners who undertake cleanups of contaminated properties under the oversight of the NDEP. According to the EDR Report, the VCP status of the site is currently listed as “active.” Additional information on the site is provided in section 4.5.

The LUST database indicates three sites within 0.5 miles of the Property. The nearest LUST site is approximately 735-feet southwest of the Property. The site is identified as Reno Police Department (Facility ID No. 4-000573). This site was enrolled in the LUST database as a result of a gasoline release which affected soil and groundwater at the site. The site was granted closure on March 5, 2014 by the appropriate agency. Given the site status, and distance from the Property, the potential for environmental impact to the Property appears to be low.

The second LUST site is located approximately 1,515-feet west-northwest of the Property. The site is identified as Marsh Properties, LLC. (Facility ID No. 4-000931). The site was enrolled into the LUST database on February 8, 2018 as a result from a heating oil release which affected soil at the site. The site was granted closure on May 2, 2018, by the appropriate agency. Given the site status and distance from the Property, the potential for environmental impact to the Property appears to be low.

The third LUST site is located approximately 1,795-feet north of the Property. The site is identified as Jacksons Food Stores #19 (Facility ID No. 4-000931). The site was enrolled into the LUST database on November 24, 2014 as a result of a diesel release which affected soil at the site. The site was granted closure on December 22, 2014, 2014 by the appropriate agency. Given the site status and distance from the Property, the potential for environmental impact to the Property appears to be low.

The EDR records search found three sites within 0.5 miles of the Property listed on the NV Brownfields database. The term “brownfield” is used to describe abandoned, idled, or underused industrial or commercial properties taken out of productive use because of real or perceived risks from environmental contamination. The State of Nevada has initiated Brownfields, a land-recycling program, to provide an opportunity to redevelop these undesirable properties and revitalize communities. These three sites were identified as petroleum hydrocarbon releases affecting soil and groundwater. Each of the three sites have been granted closure by the appropriate agency. Given the intervening gradient, site statuses, and distance from the Property, the potential for environmental impact to the Property appears to be low

The Voluntary Cleanup Program (VCP) provides relief from liability to owners who undertake cleanups of contaminated properties under the oversight of the Nevada Division of Environmental Protection. A review of the Nevada VCP list, as provided by EDR, has revealed that there is one NV VCP site within approximately 0.5 miles of the target property. The VCP site is adjacent west of the Property. The site is identified as City of Reno

Redevelopment Agency – 111 Morrill Ave. (Facility ID No. D-000100). As discussed above an oil and tar release affected soil and groundwater at the site. The date of release reported to the NDEP is listed as April 23, 2008. The site's status is currently listed as an active case. RECs are known to be present associated with this site which is located adjacent west of the Property in the form of total petroleum hydrocarbon (TPH) and perchloroethylene (PCE) impacts to groundwater underlying the Property. As of the date of this report, remedial action is being conducted (by the applicable responsible party) to address the PCE plume, including the groundwater underlying the Property. Additional discussion relative to this site is provided in Section 4.5.

Other sites listed in the table above, but not yet specifically discussed, do not likely pose a significant environmental concern relative to the Property for one or more of the following reasons: distance from Property; relative location to the Property, regulatory status of site, operating UST facilities with no violations, UST facilities that are permanently out of service, site listing not indicative of a release but rather simply indicating that the site/facility may possess chemicals of concern (e.g. RCRA Non-Gen).

4.3 Vapor Intrusion

Various environmental investigations have been completed across the Property and the adjacent site west of the Property;

Soil and groundwater borings and adjacent groundwater monitor wells associated with the adjoining western parcel (APN: 011-450-24) were installed on the eastern portion of this parcel to characterize and assess the extent of potential contaminants of concern in the subsurface. Results of investigations and post-remediation soil and groundwater sampling indicate that residual soil and groundwater contaminant concentrations may still exist on the adjoining western site to the Property. As discussed in Section 3.3, AMEC on behalf of the City of Reno Redevelopment Agency conducted a Phase I ESA on APN: 008-360-07 the adjacent site/parcel west of the Property (ESA 2008). It should be noted that APN: 008-360-07 no longer exists, as it now comprises the eastern portion of APN: 011-450-24. A portion of ESA 2008 is included in Appendix E.

As discussed in ESA 2008 AMEC states, that groundwater beneath the Site is most likely impacted with PCE. Site soils are impacted with petroleum, in some areas well in excess of the Nevada Action Limit (NAL), and as deep as groundwater at about 30 feet below site grade. Soil is impacted beneath the remaining foundation with petroleum and possibly with other chemicals used, stored and spilled within the former warehouse. Groundwater may be impacted with petroleum compounds due to past uses on the Site. The potential exists for groundwater to be impacted beneath the Site by the long history of industrial uses in the adjacent industrial areas.

Based on review of ESA 2008 and the proximity of APN: 011-450-24, recognized environmental conditions are identified on the Property. These findings are further discussed in Section 4.5. Currently there are no building structures on the Property. However, should the Property be developed, vapor intrusion is potentially an issue of concern in connection with the Property.

4.4 Historical Record Sources

The following standard historical sources may be used to meet the historical record sources review requirements of ASTM E1527-13: aerial photographs; fire insurance maps; property tax files; land title records (although these cannot be the sole historical source consulted); topographic maps; city directories; building department records; or zoning/land use records. ASTM E1527-13 requires "All obvious uses of the property shall be identified from the present, back to the property's first developed use, or back to 1940, whichever is earlier." This task requires reviewing only as many of the standard historical sources as are necessary and that are reasonably ascertainable and likely to be useful.

4.4.1 Historical Topographic Maps

The following historical topographic maps were reviewed and described. Copies of the historical topographic maps are provided in Appendix D.

<i>Date(s)</i>	<i>Map Source & Scale</i>	<i>Property Observations</i>	<i>Surrounding Area Observations</i>
1891	Reno Quad 1:125000	The Property appears undeveloped.	Downtown Reno is recorded west of the Property on this map. Central Pacific Railroad, V&T Railroad, Wells Ave, and the Truckee River are recorded on this map.
1893	Reno Quad 1:125000	No significant change.	No significant change.
1950	Reno Quad 1:62500	No significant change.	Increasing development of downtown Reno area. Apparent building structures are observed adjacent east of the Property. Reno Fair Grounds, S. Virginia St., University of Nevada-Reno, Scott Island, County Hospital, and Veteran's Hospital are recorded on this map.
1951	Reno Quad 1:62500	No significant change.	No significant change.
1967	Reno Quad 1:62500	No significant change.	Proposed I-80 development is shown on this map, The Reno Indian Colony, and Paradise Park are included on this map. Increased development of area to the northeast of the property. A gravel pit is recorded adjacent east of the Property. The Wells Ave. overpass is constructed west of the Property. A police station and medical center are recorded southwest of the Property on this map.
1974	Reno Quad 1:24000	No significant change.	Increasing development of Reno. Interstate 80 is being constructed on the map. Surrounding area of the Property is predominately industrial. Apparent warehouses are seen adjacent north and east of the Property.

1982	Reno Quad 1:24000	No significant change.	I-80 is developed north of the Property. Apparent residential areas are developed northeast of the Property. Brodhead Memorial Park is identified south of the property. A gravel pit is recorded east of the Property on this map.
2015	Reno Quad 1:24000	No significant change.	Surrounding area appears to be developed in its current configuration in this photo.

No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of the historical topographic maps.

4.4.2 Historical Aerial Photographs

The following historical aerial photographs were reviewed and described. Copies of the historical aerial photographs are provided in Appendix D.

Date(s)	Photo Source & Scale	Property Observations	Surrounding Area Observations
1939	USDA 1" = 500'	Property has two or three small structures on it. A dirt road is observed on the Property on this map.	Surrounding area is primarily industrial/commercial north of the Property and residential to the south. Apparent industrial structures are seen adjacent south and east of the Property. Railroad tracks are seen adjacent north of the Property. A vacant lot and Wells Ave. is seen adjacent west of the Property. The Truckee River is seen south of the Property in this photo.
1946	USGS 1" = 500'	A several small structures are seen on the western edge of the Property.	Additional warehouses are developed on adjacent site east of the Property. Vacant land is adjacent south of the Property in this photo.

1953	USGS 1" = 500'	Several small structures, equipment, and vehicles are seen on the Property in this photo.	Increasing development of land east of the Property. Additional warehouses and an apparent storage yard are seen adjacent east of the Property. An apparent gravel pit is observed east of the Property. Apparent containers or small building structures are seen adjacent south of the Property. A larger warehouse is observed southeast of the Property adjacent to the Truckee River in this photo. An apparent industrial warehouse and a storage yard are seen adjacent west of the Property. Increasing development of apparent industrial buildings north of the Property in this photo.
1966	USGS 1" = 500'	Property appears to be used as a storage yard. Several apparent vehicles, containers, and materials are seen on the Property in this photo.	Gravel pit east of the Property appears to be filled in. Additional construction of industrial buildings and equipment is seen east of the Property in this photo. Development of additional industrial warehouses are seen north of the Property. Several residential properties north of the Property have been removed and/or replaced with apparent commercial/industrial structures. Apparent contractor storage yard is seen adjacent west of the Property.
1972	SLA 1" = 500'	No significant change.	Construction of I-80 is seen north of the Property in this photo. Wells Ave has been expanded in this photo. An apparent gravel pit/construction area is seen east of the Property. Further development of several industrial structures north of the Property.
1978	NHD 1" = 500'	Property appears to be vacant except for a few small vehicles/containers. Morrill Ave. cuts through the Property.	Completion of I-80 is seen in this photo. A large hotel is seen completed northeast of the Property. Further development of warehouse structures south of the Property. Additional storage items/structures are seen on adjacent site to the west. A large warehouse is developed east of the Property.

1980	BELL 1" = 1000'	Several small building structures appear on the Property. E. Commercial Row is seen adjacent south to the Property.	A large apartment complex is being constructed south of the Property across the Truckee river. Apparent storage yard with several materials are seen adjacent west of the Property.
1984	USGS 1" = 1000'	No significant change.	Further development of structures and storage materials is seen on adjacent east, west, and south sites to the Property. Apparent residential apartment complex is developed south of the Property.
1994	USGS 1" = 500'	No significant change (poor quality photo).	No significant change (poor quality photo).
1999	USGS/DOQQ 1" = 500'	Several small building structures and storage containers, material, equipment, and vehicles are seen on the Property in this photo.	Several small building structures are constructed adjacent south of the Property. Large warehouse structures are constructed on adjacent west and east sites to the Property. Surrounding area appears predominately industrial.
2006	USDA/NAIP 1" = 500'	Road on the Property is now a cul-de-sac. Morrill Ave. no longer cuts across the Property. The Property is now a vacant lot.	E. Commercial Row now appears to be paved. Site adjacent west and east of the Property are vacant lots. An apparent concrete building foundation is still seen on the adjacent west site. Several of the warehouses and related storage materials are no longer seen east of the Property. A single warehouse and associated concrete barriers and storage materials are seen east of the Property. Several small building structures are seen adjacent south of the Property. A large building is observed southeast of the Property adjacent to the Truckee River.
2010	USDA/NAIP 1" = 500'	No significant change.	Greater Nevada Field and electrical substation are now developed west of the Property in this photo.
2013	USDA/NAIP 1" = 500'	No significant change.	No significant change.

2017	USDA/NAIP 1" = 500'	Several apparent vehicles appear on the Property in this photo.	Surrounding area buildings appear to be developed in their current configuration in this photo.
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No RECs, CRECs, and/or HRECs were identified relative to the Property based on review of the historical aerial photographs.

4.4.3 Fire Insurance Maps

Fire insurance maps were initially produced by private companies (such as Sanborn, Perris, and the Fire Underwriters Inspection Bureau) for the insurance industry to provide information on the fire risks of buildings and other structures. Fire insurance maps have become a valuable historical resource for persons concerned with evaluating the potential for site contamination based on the history of past Property use. Fire insurance maps are available for approximately 12,000 US cities and towns during the period from 1852 to the present. Map coverage is most comprehensive in urban core areas and in older suburbs. Map coverage is limited in suburban areas developed after 1950. Broadbent queried EDR's collection of fire insurance maps for coverage of the Property. A copy of the Certified Sanborn Map Report is provided in Appendix D.

Date(s)	Map Source	Property Observations	Surrounding Area Observations
1904	Sanborn	Property is not yet mapped.	Reno Mill and Lumber Planning Mill is mapped north of the Property. N. Park and Alameda Avenue are mapped north of the Property. The Sierra Pacific Railroad is mapped adjacent north of the Property.
1906	Sanborn	No significant change.	Reno Brewing Company bottling warehouse is mapped northeast of the Property.
1918	Sanborn	Property is mapped with an irrigation ditch running through it.	The Truckee River is now mapped south of the Property. Apparent residential area is mapped south of the Truckee River. Morrill Ave. is mapped north of the Property. The Verdi Lumber Company warehouse and related building infrastructure and storage yard is mapped north of the Property. A sheet metal facility, Nevada Packing Company, and a hotel gallery are mapped north of the Property on this map.

1949	Sanborn	No significant change.	Further development of apparent residential structures south of the Property. The A.T. Eveleth Lumber Company warehouse, storage yard and associated buildings are mapped north of the Property. Nevada Rock & Sand Company, Glass Glazing, and automotive repair garages are mapped north of the Property. Alameda Ave. underpass is developed adjacent west of the Property. A Iron and Steel warehouse is mapped north of the Property. Alameda Ave. underpass of the Sierra Pacific Railroad is mapped west of the Property. Increase in development of commercial/industrial buildings northwest of the Property is seen on this map.
1955	Sanborn	No significant change.	Sierra Machinery Company warehouses are mapped north of the Property.
1957	Sanborn	Multiple small building structures for a machinery & equipment contractor's storage yard are mapped on the Property.	Contractor's storage yard buildings are mapped adjacent east of the Property.
1966	Sanborn	No significant Change	Alameda Ave is renamed to Wells Ave. on this map. Further development of apparent residential/commercial structures south of the Property and Truckee River on this map.
1970	Sanborn	No significant change.	No significant change.
1972	Sanborn	No significant change.	No significant change.

No environmental RECs, CRECs, and/or HRECs were identified relative to the Property based on review of the historical fire insurance maps.

4.4.4 City Directories

City directories have been published for cities and towns across the US since the 1700s. Originally a list of residents, the city directory developed into a sophisticated tool for locating individuals and businesses in a particular urban or suburban area. Twentieth-century directories are generally developed into three sections: a business index, a list of resident names and addresses, and a street index. With each address, the directory lists the name of the resident or, if a business is operated from this address, the name and type of business (if unclear from the name). While city directory coverage is comprehensive for major cities, it may be less comprehensive for rural areas and small towns.

Broadbent requested EDR to provide a search of available historic city directories that may list the Property. EDR researched Cole Information and Polk's City Directories for non-sequential years beginning in 1932 and up to 2013. It should be noted that residential addresses within the unincorporated portions of counties were typically not included within city directories. Results of this search did not yield any results on the target Property. Results of this search are included in Appendix D.

No environmental RECs, CRECs, and/or HRECs were noted relative to the Property based on review of the historical city directories.

4.5 Other Environmental Records

A file review of NDEP documents indicates that on January 15, 2004, Camp, Dresser & McKee, Inc. (CDM) collected one 4-point composite sample from soil generated during Granite Construction's (Granite) trenching for the Morrill Avenue water line relocation as part of the City of Reno railroad configuration project known as the ReTRAC project. Trenching activities were stopped temporarily due to discovery of a 2 to 12-inch layer of petroleum hydrocarbon impacted soil on the Property. The composite confirmation soil sample collected by CDM indicated total petroleum hydrocarbon (TPH) concentrations above Nevada State Action Levels. TPH-extractable concentrations were 290 mg/Kg. No volatile organic compounds (VOCs) or Toxicity characteristic Leaching Procedure (TCLP) 7-metals were detected. Subsequently, CDM reported the release to NDEP on January 19, 2004. To remediate the release, approximately 15 cubic yards of petroleum hydrocarbon impacted soil was excavated from the Property by Granite. Specific details relative to this assessment are provided in Appendix E.

In a memo dated February 27, 2006 from Mr. Joe Sawyer (NDEP), a closure strategy for the Property and associated ReTRAC construction projects was developed based upon a meeting between the NDEP and WCHD. Within the memo it is stated "*prior to construction activities the regulatory agencies agreed to remove or remediate soils within the construction zone only... reasonable efforts to remove contamination within the construction zones were exercised. However contaminated soil outside of the construction zone was not delineated or removed. Accordingly, no confirmation samples were collected, and regional contamination may remain in these areas. Additional remediation was outside the scope of this effort and was not required.*" Subsequently, RECs associated with soil and groundwater outside of the construction zone have not been adequately assessed and therefore residual impacts to soil and/or groundwater potentially remain on the Property. A copy of this memo is provided in Appendix E.

Subsequently, the NDEP issued a No Further Action (case closure) letter (dated March 20, 2006), a copy of which is provided in Appendix E. In their October 17, 2006 letter the NDEP states, "the NDEP has determined that additional corrective action is not necessary per Nevada Administrative Code 445A.227."

Additionally, as discussed in Section 3.3, AMEC on behalf of the City of Reno Redevelopment Agency conducted a Phase I ESA on the adjacent site/parcel west of the Property in 2008. Review of the ESA 2008 indicates the following RECs associated with this site:

- The site overlies a regional plume of PCE in groundwater. The site does not appear to have contributed to the plume.
- Following remedial actions, residual petroleum in soil was noted in multiple locations and at various depths on the site.
- Based on the observations and analytical results of remediation of the tar pit and the oil pit, groundwater may be impacted below the area of remedial excavation.

- Groundwater at a former boring (B-29) on the site in 2000 was reported as impacted by chloroform.
- A variety of unidentified chemicals may be present beneath the remaining foundations due to the presence of multiple floor drains and to the documented spillage in 2003 of chemicals within the former warehouse on the site.
- The soil and groundwater beneath the former leachfield on the site has not been fully assessed.

AMEC concluded in their ESA 2008, *that groundwater beneath the Site is most likely impacted with PCE. Site soils are impacted with petroleum, in some areas well in excess of the NAL, and as deep as groundwater at about 30 feet below site grade. Soil is impacted beneath the remaining foundation with petroleum and possibly with other chemicals used, stored and spilled within the former warehouse. Groundwater may be impacted with petroleum compounds due to past uses on the Site. The potential exists for groundwater to be impacted beneath the Site by the long history of industrial uses in the adjacent industrial areas.*

The regional groundwater flow direction in the vicinity of the Property is assumed to be toward the south/southeast based on surface topography and proximity to the Truckee River. A long history of industrial usage has existed adjacent north of the Property, the potential exists for soil and/or groundwater to be impacted beneath the Property by historical adjacent off-site operations. Broadbent concurs with the AMEC assessment and conclusions for the evidence presented in ESA 2008. Due to the proximity of the adjacent western Site and the long history of industrial usage in proximity to the Property, the potential exists for soil and/or groundwater to be impacted beneath the Property. A portion of the ESA 2008 is included in Appendix E.

Additionally, according to the NDEP, *“sites contaminated with PCE are found in virtually every major city and state within the U.S. The Las Vegas Valley and the Reno metro area are no different. Fortunately, the geology and hydrology in the Las Vegas Valley largely restrict PCE contamination to the shallow groundwater, which is not used as a water supply source due to its naturally poor quality (high salt content). NDEP is currently investigating 28 sites in the Las Vegas Valley where PCE has been found in soil and/or shallow groundwater.*

In the Reno metro area a remediation district has been established to address PCE groundwater contamination. The district, known as the Central Truckee Meadows Remediation District (CTMRD), was established by Legislative statute NRS 540A.250; the statute authorizes county commissions to form remediation districts to address water quality issues such as PCE contamination.

In Washoe County [Reno metro area] the Washoe County Department of Water Resources is managing the CTMRD with technical assistance provided through an advisory committee. NDEP and other affected entities are participating in the advisory committee process.”

As of the date of the report provided herein, the Property continues to be located within the CTMRD Containment Boundary (https://www.washoecounty.us/csd/files/downloads1/2014_Well_Network.pdf). This documented PCE related REC, associated with multiple historic point sources located in proximity to the Property, is not the responsibility of the Property. Furthermore, all indications are that the CTMRD will continue to monitor groundwater impacts in this area, and if deemed necessary, the CTMRD will undertake the effort to remediate impacts where most applicable.

HRECs were noted relative to the petroleum hydrocarbon release discussed above for the Property, based on review of available reports, and a closure letter granted by the NDEP on March 20, 2006. Based on review of available reports/documents, recognized environmental conditions are believed to be present at the Property RECs associated with the Property include the following:

- The Property overlies a regional plume of PCE in groundwater. The Property does not appear to have contributed to the plume.
- Following remedial actions, residual petroleum in soil was noted on the Property.
- Based on the observations and analytical results of remediation of petroleum hydrocarbon impacted soil, groundwater may be impacted below the area of remedial excavation.
- The soil and groundwater beneath and in vicinity of the former excavation on the Property has not been fully assessed. As stated in the NDEP's memo dated February 27, 2006 from Mr. Joe Sawyer (NDEP), *"contaminated soil outside of the construction zone was not delineated or removed. Accordingly, no confirmation samples were collected, and regional contamination may remain in these areas. Additional remediation was outside the scope of this effort and was not required."*

Section 5: Site Reconnaissance

Mr. Brandon Reiff of Broadbent conducted a site reconnaissance of the Property on January 28, 2019, as discussed below. The weather was overcast and warm. Photographs of the Property and vicinity taken during the site reconnaissance are provided within Appendix F.

5.1 Hazardous Substances in Connection with Identified Uses

No hazardous substances or petroleum products in connection with current identified uses were observed within the boundaries of the Property during the site reconnaissance. No hazardous substances or petroleum products in connection with current identified uses were observed on properties adjoining the Property when observed from the Property or publicly accessible areas. As such, no RECs from hazardous substances or petroleum products in connection with current identified uses were known to be present on the Property at the time of the reconnaissance.

5.2 Hazardous Substance and Unidentified Substance Containers

No hazardous substance, unidentified substance, or petroleum products containers were observed within the boundaries of the Property during the site reconnaissance. No hazardous substance, unidentified substance, or petroleum product containers were observed on properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs from hazardous substance or unidentified substance containers were known to be present on the Property at the time of the reconnaissance.

5.3 Storage Tanks

No evidence of existing or historic storage tanks, vent pipes, fill pipes, or access ways indicating USTs or ASTs was observed within the boundaries of the Property during the site reconnaissance or records review. According to the EDR report, the adjacent site (1010 E Commercial Row) identified as National Oil and Burner had four USTs and three ASTs removed and was subsequent closed by WCHD. A second adjacent site (307 Morrill Ave) identified as Reno Forklift, Inc. has one active 1,000-gallon heating oil UST and three permanently out of use USTs onsite. No RECs from storage tanks were known to be present on the Property at the time of the reconnaissance.

5.4 Polychlorinated Biphenyls

Polychlorinated biphenyls (PCBs) are a class of stable compounds that are toxic to the liver and are linked to cancer. The US EPA considers PCBs a Priority Pollutant under the Clean Water Act. The maximum contaminant level of PCBs allowed in drinking water is 0.5 parts per billion (ppb). Due to PCBs' toxicity and classification as a persistent organic pollutant, the United States prohibited the manufacture of PCBs after July 1, 1979 in the Toxic Substances Control Act (TSCA) of 1976. Until then, PCBs were widely used as coolant and dielectric insulating fluids for oil-filled electrical transformers and capacitors (such as those used in ballasts of old fluorescent and high-intensity discharge lights). PCBs were also used as plasticizers in paints and cements, stabilizing additives in flexible polyvinyl chloride (PVC) coatings of electrical wiring and electronic components, pesticide extenders, cutting oils, reactive flame retardants, lubricating oils, vacuum pump fluids, hydraulic fluids, and sealants for caulking in schools and commercial buildings.

Although manufacture was prohibited after 1979, PCBs already in commerce continued to be allowed in "totally enclosed uses" such as transformers and capacitors. Due to their extended working life, some oil-filled electrical equipment may still contain PCBs. The US EPA considers a product to be "PCB-Contaminated" if the

oil contains between 50-500 parts per million (ppm), and to be a PCB product if more than 500 ppm. After July 1, 1979 and through 1998, the US EPA required new oil-filled electrical equipment to be marked "No PCBs." If an item is not so labeled, and no information is available as to the date of manufacture, an item might be assumed to contain PCBs until proven otherwise. PCB content may or may not be a matter of record with equipment or transformers belonging to a utility company.

No indication of leaks or releases from electrical equipment was observed during the site visit. No verifiable RECs, CRECs, and/or HRECs associated with PCBs were observed or known to be present on the Property at the time of the site reconnaissance.

5.5 Odors, Pools of Liquid

No pools of liquids and/or standing surface water were observed within the boundaries of the Property during the site reconnaissance. No strong, pungent, or noxious odors were noted during the site reconnaissance. No odors, pools of liquid, or standing surface water were observed on properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs associated with potential odors, pools of liquid, or standing surface water were known to be present on the Property at the time of the site reconnaissance.

5.6 Pits, Ponds, Lagoons

No pits, ponds, or lagoons were observed within the boundaries of the Property during the site reconnaissance. No pits, ponds, or lagoons were observed on properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs from pits, ponds, or lagoons were known to be present on the Property at the time of the reconnaissance.

5.7 Stained Soil/Pavement, Stressed Vegetation

Stained soil and/or pavement was not observed within the boundaries of the Property during the Property reconnaissance. Additionally, stressed vegetation was not observed on the Property or properties adjoining the Property when observed from the Property or publicly-accessible areas. As such, no RECs from stressed vegetation or stained pavement were observed to be present on the Property at the time of site reconnaissance.

5.8 Indications of Solid Waste Disposal

Evidence of solid waste disposal was observed on the Property during the reconnaissance visit. Various trash and broken blocks of concrete were observed on the Property. Solid waste is not a part of the definition of a REC. Consequently, no RECs from solid waste disposal are known to be present at the Property. However, the potential exists for a REC to be concealed by the solid waste.

5.9 Water, Storm Water, and Wastewater

Evidence of constructed storm water management drainage channels was observed along E Commercial Row adjacent south of the Property. No evidence of on-site current or historic water supply wells, constructed storm water management systems, or historic wastewater systems was observed within the boundaries of the Property during the Property reconnaissance or discovered during interviews or records review. As such, no RECs from water, storm water, or wastewater were known to be present on the Property at the time of the reconnaissance.

5.10 Monitoring Wells

One groundwater monitoring well (CORWSSMW1) and one PCE treated production well (Morrill Well) were observed on adjacent parcels southwest (APN 008-370-22) and south (APN 008-370-21) of the Property, respectively. Broadbent contacted Mr. Chris Benedict (Remediation District Program Manager for Washoe County) with regard to identification and purpose of these wells. According to Mr. Benedict, the monitoring well is identified as CORWSSMW1 and it is currently part of the Central Truckee Meadows Remediation District (CTMRD) monitoring network. The CTMRD was created by Nevada state statute and Washoe County ordinance in 1995 in order to address the presence of tetrachloroethene (PCE) in groundwater in Reno and Sparks. PCE contamination in the central Truckee Meadows is widespread and likely to have originated from multiple sources over time. According to Mr. Benedict, *monitoring well CORWSSMW1 is a 2" well, screened from 29 to 49 feet below ground surface. The well was installed in August 2006 by the City of Reno as part of a Phase II ESA for the former Western Sealing and Striping facility at/near this location.*

The CTMRD samples the well annually (in September/October each year). The last 5 years of groundwater sample results are provided in Appendix E. Except for a single, low-concentration of dichloromethane (2.5 µg/L) detected in September 2017, groundwater constituents have been below laboratory reporting limits. Each groundwater constituent analyzed in the last 5 years from monitoring well CORWSSMW1 has been below state reportable concentrations. As such, no RECs from groundwater were known to be present on the Property at the time of the reconnaissance.

The Morrill Well, adjacent south of the Property pumps groundwater for potable use with PCE in excess of drinking water standards. The water is treated at the well head before entering the distribution system. The Morrill Well is screened from 178 to 578 feet below ground surface and has a pumping capacity of 1,400 gallons per minute. The Morrill Well is owned by the Truckee Meadows Water Authority and the remediation is paid for by the CTMRD.

Section 6: Interviews

The following interviews were conducted in accordance with the requirements of ASTM E1527-13.

6.1 Interviews with Past and Present Owners and Occupants

Interviews were conducted with the following individuals. Use-Provided Information Questionnaires completed by the interviewees are provided in Appendix B.

<i>Role</i>	<i>Title</i>	<i>Name</i>	<i>Company</i>	<i>Method</i>	<i>Comments</i>
ESA User	Property Agent	Ms. Lori Miles	City of Reno	Questionnaire	Previous Phase I & II ESAs conducted on the Property and adjacent sites. NDEP issued a no further action letter dated March 20, 2006 for the Property.

RECs and/or HRECs as discussed in Section 4.5 were noted relative to the Property based on review of information gathered via interviews.

6.2 Interviews with State and/or Local Government Officials

Broadbent contacted the Nevada Division of Environmental Protection (NDEP) with regard to reported environmental issues at the Property. Environmental records on file with the NDEP include CDM documents, closure memo, and No Further Action Letter. Copies of the available reports/documents are provided in Appendix E.

Broadbent contacted the Washoe County Environmental Health Department (WCHD) with regard to any past and/or current environmental issues at the Property. WCHD has identified records on file are located at the NDEP.

Broadbent contacted the Central Truckee Meadows Remediation District with regard to reported environmental issues at the Property. Information provided by CTMRD is previously discussed in Sections 4.5 and 5.10.

Section 7: Data Gaps

A data failure is failure to achieve the historical research objectives of ASTM E1527-13. A data gap is the incompleteness in activities required in this practice. The following data gaps occurred during conduct of this ESA: Recorded land title records were not provided by the client, the City Directory did not provide coverage of the Property, and County and City development records were not reviewed.

Based on the experience and good faith efforts of the environmental professionals responsible for conducting and reviewing this ESA, the above data gaps do not constitute a data failure and are not significant enough to affect identification of recognized environmental conditions on the Property.

Section 8: Findings

Findings of the ESA have been discussed throughout the body of this report and are tabulated below.

Report Section		REC (Y/N)	CREC (Y/N)	HREC (Y/N)	De Minimis Conditions (Y/N)	Comments
2	Site Description	N	N	Y	N	Vacant industrial lot.
3	User-Provided Information	Y	N	Y	N	Review of ESA 2008 and NDEP files
4	Records Review	Y	N	Y	N	RECs associated with adjacent facilities located in proximity of the Property in the form of potential PCE impacts to groundwater underlying the Property; residual petroleum hydrocarbon impacts to soil on the Property; HRECs: Former petroleum hydrocarbon impacted soil and associated remedial activities.
5	Site Reconnaissance	N	N	N	N	Vacant industrial lot. Observed two monitoring wells on adjacent Property.
6	Interviews	Y	N	Y	N	Review of User provided ESA 2008 and NDEP records

This ESA has revealed evidence of RECs and HRECs associated with area and Property, respectively. Regarding RECs:

- The Property overlies a regional plume of PCE in groundwater. Adjacent facilities located in proximity of the Property have created PCE impacts to groundwater underlying the Property. The impacted groundwater is within the containment boundary monitored by the Central Truckee Meadows Remediation District. As of the date of this report, remedial action and/or monitoring are being conducted by applicable responsible party(s) and all indications are that this will continue until case closure is granted.
- Following remedial actions, residual petroleum impacts to soil was noted on the Property.
- Based on the observations and analytical results of remediation of petroleum hydrocarbon impacted soil, groundwater may be impacted below the area of remedial excavation.
- The soil and groundwater beneath and in vicinity of the former excavation on the Property has not been fully assessed. As stated in the NDEP's memo dated February 27, 2006 from Mr. Joe Sawyer (NDEP), *"contaminated soil outside of the construction zone was not delineated or removed. Accordingly, no confirmation samples were collected, and regional contamination may remain in these areas. Additional remediation was outside the scope of this effort and was not required."*

HRECs were noted relative to the petroleum hydrocarbon release discussed above for the Property, based on review of available reports, and a closure letter granted by the NDEP on March 20, 2006.

Section 9: Conclusion

Broadbent has conducted this ESA in conformance with the scope and limitations of ASTM Practice E1527-13 for the Property located at 0 E. Commercial Row, Reno, NV. Exceptions to, or deviations from, this practice are described in Section 1.4 of this report.

This ESA has revealed evidence of the following RECs associated with the Property:

- The Property overlies a regional plume of PCE in groundwater. Adjacent facilities located in proximity of the Property have created PCE impacts to groundwater underlying the Property. The impacted groundwater is within the containment boundary monitored by the Central Truckee Meadows Remediation District. As of the date of this report, remedial action and/or monitoring are being conducted by applicable responsible party(s) and all indications are that this will continue until case closure is granted.
- Following remedial actions, residual petroleum impacts to soil was noted on the Property.
- Based on the observations and analytical results of remediation of petroleum hydrocarbon impacted soil, groundwater may be impacted below the area of remedial excavation.
- The soil and groundwater beneath and in vicinity of the former excavation on the Property has not been fully assessed. As stated in the NDEP's memo dated February 27, 2006 from Mr. Joe Sawyer (NDEP), *"contaminated soil outside of the construction zone was not delineated or removed. Accordingly, no confirmation samples were collected, and regional contamination may remain in these areas. Additional remediation was outside the scope of this effort and was not required."*

Section 10: Limitations & Exceptions of Assessment

Broadbent prepared this report for the NDEP and City of Reno. This ESA is based on review of the site description, User-provided information, readily ascertainable environmental records, and results of site reconnaissance and interviews. This ESA was conducted in accordance with generally accepted environmental practices and procedures, as of the date of the report. Reputable environmental professionals practicing in this or similar localities conducted the services employing a degree of care and skill ordinarily exercised under similar circumstances. Findings and conclusions were made using methodologies employed per ASTM International Practice E1527-13 described by ASTM International as representing good commercial and customary practice for conducting an ESA of a property for the purpose of identifying RECs. No other warranties are implied or expressed.

No environmental sampling and associated analyses were undertaken for this ESA report. It is possible that variations in conditions could exist beyond points explored in this investigation.

This report represents professional opinion and judgment, which are dependent upon information obtained during the performance of consulting services. Environmental conditions may exist at the Property that cannot be identified. Conclusions are based, in part, on information supplied by others, the accuracy or sufficiency of which may not be independently reviewed. No investigation can be thorough enough to exclude the presence of hazardous materials at a given site; therefore, if no hazardous materials are identified during an assessment, such a finding should not be construed as a guarantee of the absence of such materials on a property, but rather the results of services conducted within project scope, cost, and other real limitations.

Opinions presented apply to conditions existing at the time services were conducted. Broadbent is unable to report on, or accurately predict events that may impact the Property following performance of the described services, whether occurring naturally or caused by the actions of others. Broadbent assumes no responsibility for conditions it is not authorized to investigate or conditions not generally recognized as environmentally unacceptable at the time services are conducted. Broadbent is not responsible for change in applicable environmental standards, practices, laws, or regulations following performance of services.

Section 11: Certification Statement & Signatures

As required by 40 CFR Part 312.21(d), I declare that, to the best of my professional knowledge and belief, I meet the definition of an Environmental Professional as defined in §312.10 of this part. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject Property. I have developed and conducted the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. My qualifications as an Environmental Professional are presented within Appendix G.

BROADBENT & ASSOCIATES, INC.

Signature:



Name: Brandon Reiff

Title: Senior Geologist

Date: March 21, 2019

Registration No.: 2300

State of: NV

Section 12: References

- AMEC Earth Earth & Environmental, Inc., 22 January 2008. Phase I Environmental Site Assessment – Tax Assessors Parcel 008-360-07, Reno, Washoe County, Nevada.
- American Society for Testing and Materials, 6 November 2013. Designation E1527-13: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.
- Environmental Data Resources, 14 December 2018. The EDR Aerial Photo Decade Package: City of Reno Brownfields, 0 E Commercial Row., Reno, NV 89501 (Inquiry # 5512658.54).
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- Environmental Data Resources, 14 December 2018. The EDR Radius Map Report with GeoCheck: City of Reno Brownfields, 0 E Commercial Row., Reno, NV 89501 (Inquiry # 5512658.47s).
- Environmental Data Resources, 14 December 2018. Certified Sanborn Map Report: City of Reno Brownfields, 0 E Commercial Row., Reno, NV 89501 (Inquiry # 5512658.48).
- Environmental Data Resources, 14 December 2018. EDR Historical Topographic Map Report: City of Reno Brownfields, 0 E Commercial Row., Reno, NV 89501 (Inquiry # 5512658.49).
- Nevada Division of Environmental Protection, 2 July 2008. Voluntary Cleanup Program – City of Reno Redevelopment Agency Approval Letter for VCP Application.
- Nevada Division of Environmental Protection, 17 October 2006. Groundwater Investigation Summary, Former Western Sealing and Stripping, 111 Morrill Avenue, Reno, NV, NDEP Facility ID#D-000100.
- Nevada Division of Environmental Protection, 27 February 2006. Reno ReTrac case closure strategy memo to file.
- Nevada Division of Environmental Protection, 20 March 2006. No Further Action Required, ReTrac Zone 233 – PVS, NDEP Spill Response No. 040119-02, Facility ID# D-000124.

FIGURES

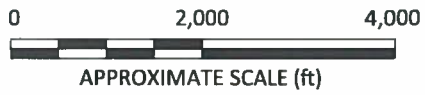
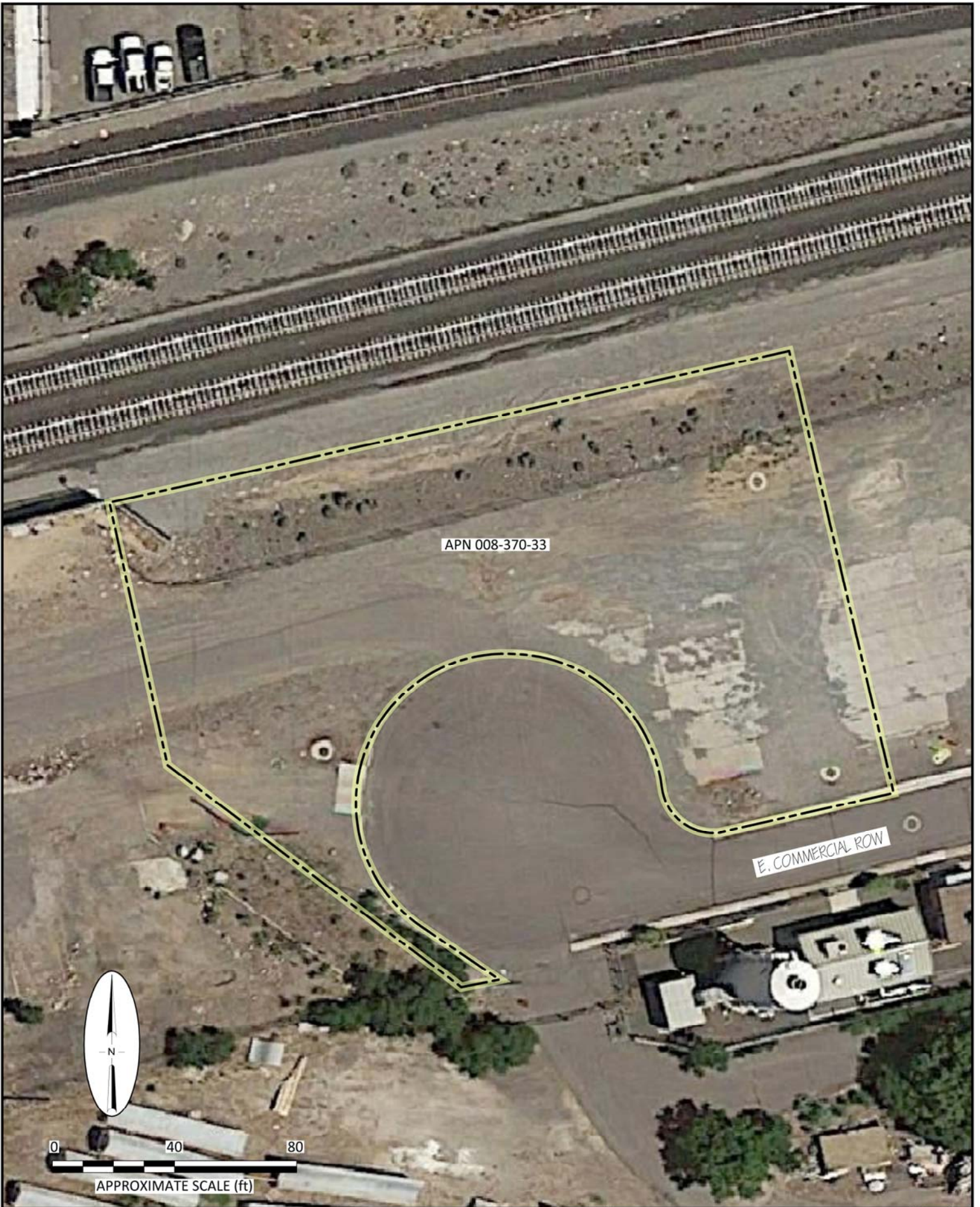
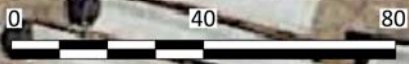


IMAGE SOURCE: Google Earth



APN 008-370-33

E. COMMERCIAL ROW



APPROXIMATE SCALE (ft)



BROADBENT

5450 Louie Lane, #101
Reno, Nevada 89511

Project No.: 18-02-211 Date: 1/23/2019

Phase I ESA
0 E. Commercial Row
Reno, Nevada

Property Location Map

Drawing

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