



**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

0 Lake Street
Reno, Nevada, 89501
(APN: 007-311-21)

Prepared for:

Nevada Division of Environmental Protection-Brownfields Program
Attn: Mr. David Friedman
901 S. Stewart St., Suite 4001
Carson City, NV 89701
Brownfields Contract: DEP #17-026
Task BC04-19
Category 54
Organizational Code 5429
Job Number 6681717

Prepared by:

Broadbent & Associates, Inc.
5450 Louie Lane, #101
Reno, Nevada 89511
775-322-7969

August 2, 2019

Project No.: 19-02-133



BROADBENT

5450 Louie Lane, Suite 101, Reno, NV 89511
[T] 775-322-7969 [F] 775-322-7956
broadbentinc.com

Creating Solutions, Building Trust.

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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 Lake St., (APN: 007-311-21) Reno, Nevada 89501.

Dear Mr. Friedman:

Attached is the report titled *Phase I Environmental Site Assessment, 0 Lake St., (APN: 007-311-21), Reno, Nevada 89501*. 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 Drawings

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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
NDEP – Nevada Division of Environmental Protection
NPL – National Priorities List
PCB – Polychlorinated-biphenyls
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 Lake St. (APN 007-311-21), Reno, Nevada, 89501. 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 RECs and HRECs associated with area and Property, respectively. Regarding RECs:

- The Property overlies/is located within a regional and historic PCE groundwater plume created by adjacent facilities located in proximity of 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.
- Post historic remedial action TPH impacts to soil above Nevada State Reportable concentrations remain in place in multiple locations and at various depths on the Property.
- Based upon observations and laboratory analytical results associated with remediation of an abandoned fuel pipeline on the Property, groundwater may be impacted below the area of remedial excavation.
- As part of a 2003 Phase II ESA investigation, two soil borings were installed on the Property (B-1 and B-2). The soil sample collected from boring B-2 at a depth of 2.5 feet contained a concentration of 2,900 mg/Kg of TPH- oil. Additionally, one groundwater monitoring well (MW-1) was installed on the Property and a water sample collected in 2003 found PCE concentrations above the state action level (5.0 µg/L) at 8.1 µg/L.
- Impacts to soil and groundwater beneath the Property have not been fully assessed. As stated in the NDEP’s memo dated February 27, 2006 from Mr. Joe Sawyer, *“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.”*
- A long history of industrial usage exists adjacent to and north of the Property. The regional groundwater flow direction in vicinity of the Property is assumed to be toward the south and east based on surface topography and proximity to the Truckee River. Consequently, the potential exists for soil and/or groundwater to be impacted beneath the Property by historical adjacent operations and historic heating oil UST releases discovered during RTC Transit Bus Facility development located to the north.

- RECs associated with asbestos containing material (ACM) and lead based paint (LBP) are identified for the Property based on the following:
 - Age of the building and the potential for presence of ACMs and/or LBP;
 - Unknown condition of structural materials potentially containing ACMs and/or LBP; and
 - Undetermined future use of the existing structure on the Property.

For ACM, should renovation and/or demolition activities be undertaken, then it is recommended that an Asbestos Demolition/Renovation Survey be completed and that all ACM that will be impacted by the demolition and/or renovation be properly abated to comply with federal and state regulations.

For LBP, it is recommended that any area to be disturbed be checked prior to disturbance to be in compliance with Nevada lead regulation requirements.

It should be noted, RECs regarding ACM/LBP, could be removed should a date of construction be obtained for the mobile home and/or removing it from the Property prior to redevelopment.

Regarding HRECs, during excavation of fill material for the City of Reno railroad configuration project known as the ReTRAC project (Zone 238), an abandoned 3-inch diameter pipeline was uncovered at the native soil interface on the southern portion of the Property. The pipeline was badly damaged and had, at some point, discharged diesel fuel onto the soil. To remediate the release, approximately 45 cubic yards of petroleum hydrocarbon impacted soil were excavated from the Property. Subsequently, the NDEP issued a No Further Action (case closure) letter (dated March 9, 2006).

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 Lake St., (APN: 007-311-21) 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 NDEP and the City of Reno and may not be reproduced, distributed, or relied upon by others without the prior written authorization of NDEP and/or City of Reno and Broadbent. A Reliance Letter can be prepared for additional use upon request by NDEP or City of Reno.

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 within the incorporated limits of Reno, NV. The Property's current physical address is 0 Lake St., Reno, NV. The Property consists of one parcel assigned Washoe County Assessor's Parcel Number 007-311-21. 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 39.5292420 North, -119.8107190 West NAD83. The Property is located within the northeast ¼ of Section 11, 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 parking lot, with a mobile home trailer and several storage containers parked on the Property. No RECs, CRECs, and/or HRECs were noted relative to the Property based on review of current uses.

2.3 Description of Structures, Roads, and Other Improvements

The Property is currently a parking lot occupied with a mobile home trailer and storage containers. No information was available on the county assessor page for the mobile home trailer located on the Property. The trailer home is currently utilized as the Men's Club accounting office. Additional Property information is provided in the table below.

Size of Property (approximate)	According to the Washoe County Assessor, the approximate size of parcel 007-311-21 is 0.493 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 west side of the Property via Lake St.
Paved or Concrete Areas (including parking)	The Property is a paved asphalt parking lot.
Unimproved Areas	There are no known unimproved areas.
Landscaped Areas	No landscaped areas were observed on the Property.
Surface Water	At its closest point the Truckee River is approximately 1,000 ft. southeast 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 200 E 4 th St.	E Plaza St. RTC 4 th Street Bus Station	Public thoroughfare APN: 007-311-19
South	N/A N/A 270 Lake St.	Union Pacific Railroad Alleyway Men's Club	None Public thoroughfare APN: 011-380-30
West	N/A 300 N. Center St.	Lake St. National Bowling Stadium	Public thoroughfare APN: 011-380-29
East	0 Evans Ave. 0 Evans Ave.	Vacant lot Vacant Lot	APN: 007-311-22 APN: 007-311-23

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 and included in Appendix B.

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 parking 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. For the ESA documented herein, the User provided knowledge that the Property and the adjacent parcels east of the Property have undergone Phase I/II environmental site assessments (ESAs). Ms. Lori Miles (Property Manager for the City of Reno) provided a Union Pacific Railroad Land Transfers Phase I Environmental Site Assessments Final Report dated June 2000 (Phase I 2000). The Phase I 2000 report was performed by Lahontan GeoScience, Inc. (Lahontan) for the Property. The Phase I 2000 report assesses several properties along a 400-foot-wide railroad corridor (200 feet north and south of the tracks) along with adjacent parcels. The railroad corridor properties assessed in the Phase I 2000 extended from the Union Pacific Railroad (UPRR) W. 2nd St. underpass in the west to the intersection of Galletti Way and the UPRR tracks at the Reno City limit in the east. The target Property for this herein Phase I ESA is identified in the Phase I 2000 report as Allright Sierra Parking (APN: 011-380-05).

Lahontan found evidence of recognized environmental conditions during their assessment. The findings of the Phase I ESA 2000 include evidence of the following RECs associated with the Property:

- Adjacent northern parcel 007-311-06 (present day RTC Transit Facility) is currently an active groundwater investigation.
- Two City of Reno boreholes were identified on the eastern side of the Property.

It should be noted that the Property is described in the Phase I 2000 as the defunct parcel of APN: 011-380-05, which is now a part of the current APN for the Property (APN: 007-311-21). Further discussion of Phase I 2000 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 4,499 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 1,000 feet southeast 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 east of 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 "Orr" 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 based on topography is assumed to be toward the south. Depth to groundwater is expected to be approximately 15-40 ft 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)	3/11/19	N	0	N
Federal Delisted NPL Sites (<1.0 mile)	3/11/19	N	0	N
Federal SEMS Sites (< 0.5 mile)	3/11/19	N	0	N
Federal CERCLIS NFRAP – SEMS ARCHIVE Sites (<0.5 mile)	3/11/19	N	2	N
RCRA CORRACTS Sites (<1.0 mile)	3/25/19	N	0	N
RCRA non-CORRACTS TSD Facilities (< 0.5 mile)	3/25/19	N	0	N
RCRA LQG (<0.25 mile)	3/25/19	N	0	N
RCRA SQG (<0.25 mile)	3/25/19	N	0	N
RCRA CESQG (<0.25 mile)	3/25/19	N	4	N
Federal ERNS Sites (Property Only)	3/25/19	N	0	N
US Institutional/Engineering Controls (<0.5 mile)	1/31/19	N	0	N
State Agencies				
State & Tribal equivalent CERCLIS (SHWS) (<1.0 mile)	12/17/18	N	174	N
State & Tribal SWF/LF (<0.5 mile)	11/27/18	N	0	N
State & Tribal LUST (<0.5 mile)	12/17/18	N	2	N
State & Tribal ASTs (<0.25 mile)	1/25/18	N	1	N
State & Tribal USTs (<0.25 mile)	1/25/18	N	40	N
State & Tribal Voluntary Cleanup Sites (<0.5 mile)	12/17/18	N	1	N
State & Tribal Brownfield Sites (<0.5 mile)	12/17/18	N	3	N
Other Ascertainable Records				
US Brownfields (<0.5 mile)	12/17/18	N	16	N
Recycling Facilities in Nevada (SWRCY) (<0.5 mile)	10/12/18	N	5	N
RCRA-NonGen (<0.25)	3/25/19	N	23	N
Facility Index System/Facility Registry System (FINDS) (Property Only)	2/15/19	Y	2	N
Enforcement & Compliance History (ECHO) (Property Only)	3/3/19	Y	1	N
NV NPDES (Property Only)	12/19/18	Y	1	N
EDR Exclusive				
EDR US Historic Auto Station (<0.125 mile)	NA	N	5	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 listed on three of the databases that were searched. Database results for the target Property and those surrounding the target property are discussed below.

The target Property was identified on the US National Pollutant Discharge Elimination System (NPDES) database. Under NPDES, all facilities that discharge pollutants from any point source into waters of the United States are required to obtain a permit. The permit will likely contain limits on what can be discharged, impose monitoring and reporting requirements, and include other provisions to ensure that the discharge does not adversely affect water quality. Based on information contained within the EDR Report, the Property obtained a NPDES permit (permit #CSW-29841) on December 20, 2012 for storm water construction. The facility permit status is "terminated."

The target Property is also listed on the ECHO and FINDS databases. The Property being listed on these databases does not indicate a release but rather simply indicates that the site/facility may have possessed chemicals of concern at some point in the past.

Results of the records search found 174 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 12 sites were identified as petroleum hydrocarbon releases affecting soil and/or groundwater. Each of these 12 sites have been granted closure by the appropriate agency. Given the site statuses, and distance from the Property, the potential for environmental impact to the Property appears to be low.

Review of the SEMS-ARCHIVE list has revealed that there are two SEMS - ARCHIVE sites located within approximately 0.5 miles of the Property. The Federal SEMS-ARCHIVE database provides a list of sites that have been removed and archived from the inventory of SEMS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless further information indicates that this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

The nearest SEMS – ARCHIVE site is identified as Washoe Drum Site. This site is located approximately 1,496 feet south of the Property. The Washoe Drum Site is identified as a "Removal Only Site" and no site assessment work is needed. Given the archived site-status and distance from the Property, the potential for environmental impact to the Property relative to this site appears to be low.

The second SEMS – ARCHIVE site is identified as the Palomino Valley Site. This site is located approximately 2,361 feet south-southeast of the Property. Given the archived site-status and distance from the Property, the potential for environmental impact to the Property relative to this site appears to be low.

The LUST database indicates two sites within 0.5 miles of the Property. The nearest LUST site is approximately 1,143-feet north of the Property. The site is identified as March Properties LLC (Facility ID No. 4-000232), and is listed on the LUST database as a result of 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 second LUST site is located approximately 1,256-feet east-southeast of the Property. The site is identified as Reno Police Department (Facility ID No. 4-000573). The Site is listed on the LUST database as a result of a

gasoline release which affected soil and groundwater. 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 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 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 approximately 2,516 feet east of the Property and identified as City of Reno Redevelopment Agency – 111 Morrill Ave. (Facility ID No. D-000100). As a result of historic petroleum hydrocarbon impacts on this 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 Property is currently listed as “active.” Based on personal communication from Mr. David Friedman (NDEP-BCA staff), the case was closed on October 17, 2006 utilizing NAC 445A.227(2)(a-k) criteria. Given the site statuses and distance from the Property, the potential for environmental impact to the Property appears to be low.

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; 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 adjacent sites. Soil borings and a groundwater monitor well associated with the Property were installed 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 Property.

As discussed in Section 4.5 below: groundwater beneath the Site is most likely impacted with PCE; in some areas on the Property soils are known to be impacted with petroleum hydrocarbons in excess of the Nevada Action Limit; groundwater may be impacted with petroleum compounds due to past uses on the Property; and the potential exists for underlying groundwater to be impacted by the long history of industrial uses in the north adjacent RTC Transit Station area.

Based on review of available reports, RECs 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	Property is located in east downtown Reno.	Central Pacific Railroad, V&T Railroad, 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	Property is within the developed part of downtown Reno. The Central Pacific Railroad is adjacent south of the Property.	Increasing development of downtown Reno area. The V & T Railroad is re-routed east of the Property. Reno High School, S. Virginia St., Lake St., Idlewild Park, E. 4 th St., University of Nevada-Reno, the Reno Fair Grounds, and Highland Reservoir are recorded on this map.
1951	Reno Quad 1:62500	No significant change.	No significant change.
1967	Reno Quad 1:24000	No significant change.	US 40 is mapped north of the Property. A Station is identified southwest of the Property on this map. St. Mary’s Hospital is identified northwest of the Property. An aqueduct and police station are recorded southeast of the Property. I-80 is being constructed north of the Property.

1974	Reno Quad 1:24000	No significant change.	Increasing development of Reno. Buildings are identified adjacent north, east, and south of the Property. Interstate 80 and US 395 are being constructed on the map. An apparent vacant lot is observed adjacent west of the Property. Surrounding area of the Property is predominately commercial.
1982	Reno Quad 1:24000	No significant change.	I-80 and US 395 are developed north of the Property. Broadhead Memorial Park is identified east of the Property on this map.
2015	Reno Quad 1:24000	No significant change.	Surrounding area appears to be developed in their current configuration on this map.

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.

<i>Date(s)</i>	<i>Photo Source & Scale</i>	<i>Property Observations</i>	<i>Surrounding Area Observations</i>
1939	USDA 1" = 500'	The Property appears to primarily be a vacant lot in this photo. A small-shed-like structure is observed on the Property.	Surrounding area is predominately developed with apparent industrial/commercial use. Lake St. and East Plaza St. are developed adjacent to the Property. Apparent commercial building structures are seen adjacent north of the Property. The Truckee River is south of the Property. The Union Pacific Railroad is adjacent south of the Property. Apparent warehouse and/or storage containers are seen adjacent west of the Property. A small building structure is seen adjacent east of the Property.
1946	USGS 1" = 500'	There appears to be a container, possibly lumber materials, staged on the Property.	No significant change.

1953	USGS 1" = 500'	Two apparent smaller shed-like buildings are seen on the southern portion of the Property. The Property appears to be used as a parking lot.	Plaza St. adjacent north of the Property is developed.
1966	USGS 1" = 500'	The property is developed as a parking lot.	A large parking lot is developed adjacent west of the Property. It appears N. Center St. and E. 4 th St. have been widened. Apparent railroad cars are seen adjacent east of the Property.
1972	SLA 1" = 500'	No significant change.	I-80 is seen under construction north of the Property.
1980	USGS 1" = 750'	Poor photo quality can't properly observe the Property.	No significant change (poor resolution to photo).
1984	USGS 1" = 1000'	No significant change.	No significant change.
1994	USGS 1" = 500'	No significant change (poor photo).	I-80 is developed north of the Property. The National Bowling Stadium is developed west of the Property (poor quality photo).
1999	USGS/DOQQ 1" = 500'	No significant change.	An apparent parking garage is observed southwest of the Property in this photo. RTC bus station is seen adjacent north of the Property. Further development of downtown hotels northwest of the Property is seen in this photo.
2006	USDA/NAIP 1" = 500'	No change to Property.	The Reno Convention Center is developed northwest of the Property in this photo. Apparent vacant lots are seen adjacent east and north of the Property. A commercial building and parking lot are seen adjacent south of the Property.
2010	USDA/NAIP 1" = 500'	No significant change.	Surrounding area buildings appear to be developed in their current configuration in this photo.
2017	USDA/NAIP 1" = 500'	No significant change.	No significant change.

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 regarding the uses of properties at specified dates. A copy of the Certified Sanborn Map Report is provided in Appendix D.

Date(s)	Map Source	Property Observations	Surrounding Area Observations
1885	Sanborn	A Reno Lumber Company building is mapped on the Property. Central Pacific Railroad tracks are mapped on the southern portion of the Property.	The Central Pacific Railroad is mapped adjacent of the Property. The Central Pacific Railroad Freight House is adjacent west of the Property. 3 rd St. is adjacent north of the Property. The Depot Hotel is mapped adjacent southwest of the Property. Apparent residential dwellings are mapped adjacent north of the Property. A vacant lot is mapped south of the Property.
1890	Sanborn	A railroad infrastructure building is mapped on the Property. An additional railroad track is mapped on the middle portion of the Property. Central Pacific Railroad tracks are mapped on the southern portion of the Property. are mapped on the southern portion of the Property.	A Railroad freight depot is mapped adjacent west of the Property. The G.P. Railroad Depot is mapped adjacent southwest of the Property. The Virginia & Truckee Railroad is mapped south of the Property. Additional railroad tracks are mapped south of the Property. The Central Pacific Railroad Roundhouse is mapped southeast of the Property. The Reno Mill & Lumber Company building is mapped east-northeast of the Property. Additional residential dwellings are mapped adjacent north of the Property. Lake St. and Peavine St. are mapped east and west, respectively of the Property.

1899	Sanborn	A Railroad Depot is mapped on the Property. Additional NV-CA-OR Railroad tracks are mapped on the northern portion of the Property while, Sierra Pacific Railroad tracks are mapped on the southern portion of the Property.	The Hotel Clarendon is mapped south of the Property. A bowling alley and additional dwellings are mapped south of the Property. A Railroad freight depot is mapped adjacent west of the Property. The G.P. Railroad Depot is mapped adjacent southwest of the Property. The Virginia & Truckee Railroad is mapped south of the Property. Additional railroad tracks are mapped south of the Property. The Central Pacific Railroad Roundhouse is mapped southeast of the Property. The Reno Mill & Lumber Company building is mapped east-northeast of the Property. Additional residential dwellings are mapped adjacent north of the Property.
1904	Sanborn	Nev.Cal.OR Railroad Depot and Offices are mapped on the Property. Railroad tracks are mapped on the southern and northern portions of the Property. .	The Overland Hotel and Hotel Clarendon are mapped adjacent south of the Property. is mapped adjacent east of the Property. E. 4 th St. and E. Plaza St. are mapped north and south of the Property, respectively. Hotel Nevada is mapped northwest of the Property. The Reno Mercantile General Store is mapped east of the Property.
1906	Sanborn	No significant changes.	No significant changes.
1918	Sanborn	Buildings are no longer mapped on the Property. NV.CA.OR and the Sierra Pacific Railroad tracks are mapped on the Property.	E. Plaza St., dwellings, lodgings, a laundry facility, and hotel are mapped adjacent north of the Property. Depot buildings are mapped adjacent west of the Property. E. Commercial Row and several hotels are mapped adjacent south of the Property. The main Sierra Pacific Railroad tracks are mapped adjacent east of the Property.
1949	Sanborn	No significant change.	A large warehouse and several commercial structures are mapped adjacent north of the Property. An apparent railroad structure is mapped adjacent northeast of the Property. A large Building Material and Feed Warehouse is mapped east of the Property. Sierra Pacific Railroad tracks and the Railway Express Agency building are mapped adjacent south of the Property. A Freight Office building is mapped adjacent west of the Property. Reno Junior High School is mapped northwest of the Property. The Southern Pacific Freight Station is mapped southeast of the Property.

1955	Sanborn	The NV.CA.OR railroad tracks no longer appear on the northern portion of the Property.	No significant changes.
1957	Sanborn	No significant change.	Northside Junior High School is mapped northwest of the Property. Peavine Ave. is now mapped as Evans Ave.
1966	Sanborn	No significant change.	A home storage yard is mapped east of the Property.
1970	Sanborn	Fewer railroad tracks appear on the Property.	Several motels are mapped north of the Property. A gas & oil structure and used auto sales building are mapped north of the Property. A large parking lot is mapped adjacent northwest of the Property.
1972	Sanborn	No significant changes.	No significant changes.

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 Polk's City Directories for non-sequential years beginning in 1932 and up to 2014. 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 June 18, 2004, during excavation of fill material for the City of Reno railroad configuration project known as the ReTRAC project (Zone 238), an abandoned 3-inch diameter pipeline was uncovered at the native soil interface on the southern portion of the Property. The

pipeline was badly damaged and had, at some point, discharged diesel fuel onto the soil. Camp, Dresser & McKee, Inc. (CDM) collected one 4-point composite sample to characterize impacted soil for disposal, which detected total petroleum hydrocarbon (TPH) extractable concentrations above Nevada State Action Levels, at 810 mg/Kg. No volatile organic compounds (VOCs) or Toxicity characteristic Leaching Procedure (TCLP) 7-metals (with exception of Barium) were detected. CDM reported the release to NDEP on November 7, 2005 (NDEP spill #051107-07). To remediate the release, approximately 45 cubic yards of petroleum hydrocarbon impacted soil was excavated from the Property. The impacted soil was properly disposed of at the Lockwood Landfill under City of Reno waste manifests 238-0001 to 238-0003. Specific details relative to this assessment are provided in Appendix E.

In a memo dated February 27, 2006 from Mr. Joe Sawyer of NDEP, a closure strategy for the Property and associated ReTRAC construction projects was developed based upon a meeting between the NDEP and the Washoe County Health Department (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.”* Based upon this information, 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 present 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 9, 2006), a copy of which is provided in Appendix E. In their March 9, 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, Lahontan on behalf of the City of Reno conducted a Phase I ESA (previously identified as Phase I ESA 2000) on several properties along a 400-foot-wide railroad corridor (200 feet north and south of the tracks) along with adjacent parcels. The railroad corridor properties assessed in the Phase I 2000 extended from the Union Pacific Railroad (UPRR) W. 2nd St. underpass in the west to the intersection of Galletti Way and the UPRR tracks at the Reno City limit in the east. The target Property for the Phase I ESA provided herein is identified in the Phase I ESA 2000 report as Allright Sierra Parking. It should be noted that the Property is described in the Phase I ESA 2000 as the defunct parcel of APN: 011-380-05, which is now a part of the current APN for the Property (APN: 007-311-21).

Review of the Lahontan Phase I ESA 2000 revealed evidence of the following RECs associated with the Property:

- Adjacent northern parcel 007-311-06 is listed as an active UST case with the Washoe County Health Department (WCHD). Three to five unregistered USTs are suspected to be located on the Property. A suspected release was reported in 1989. Due to the unresolved nature of the UST case, the potential exists for soil and/or groundwater to be impacted beneath the Property.
- Two City of Reno boreholes were identified on the eastern side of the Property. These were presumed to be boring locations for the ReTrac Environmental Investigation Project.

A Phase II ESA Report was submitted by Ninyo & Moore/Black Eagle Consulting, Inc. on September 16, 2003. That Phase II ESA was conducted on 12 parcels including the target Property for this Phase I ESA. The subject site is bounded by E. 4th St. to the north, Lake St. to the west, Evans St. to the east, and the railroad to the south. The Phase II was conducted to assist the Regional Transportation Commission (RTC) in developing the 4th Street Transit Station. The Phase II ESA concluded that several heating oil USTs were located on the subject site. The Phase II also concluded that soil and groundwater contained petroleum hydrocarbons and PCE in excess of state action levels. As part of the Phase II ESA, two soil borings were installed on the Property (B-1

and B-2). The soil sample collected from boring B-2 at a depth of 2.5 feet bls contained a concentration of 2,900 mg/Kg of oil range petroleum hydrocarbons. Additionally, one groundwater monitoring well (MW-1) was installed on the Property. Groundwater samples collected from MW-1 during the Phase II Assessment on August 11, 2003 indicated concentrations of tetrachloroethene (PCE) above the state action level (5.0 µg/L) at 8.1 µg/L. Phase II ESA findings are summarized in Kleinfelder's *Letter Report of Findings*, dated September 14, 2007 (Appendix E). A full copy of the Ninyo & Moore Phase II 2003 report was not provided nor located in regulatory file reviews.

Based on the above Phase II findings, the RTC applied for an NDEP Brownfields Program grant which was approved by NDEP in a letter dated June 1, 2007 (provided in Appendix E). NDEP requested that Kleinfelder provide UST removal services. Kleinfelder removed eight USTs from the subject site during December 2007. Details of UST removal activities are discussed in Kleinfelder's *Memorandum* dated December 11, 2007, *Request for Risk-Based Closure* dated December 21, 2007, and *Report of Completion – Underground Storage Tank Removal* dated January 8, 2008 (Appendix E).

In September 2008, RTC contracted Granite Construction Company (Granite) for site preparation activities for the proposed 4th Street Transit Station adjacent north of the Property. During site preparation activities, additional USTs were encountered. Additional 2008 UST removal activities and soil assessment activities are summarized in Kleinfelder's *Request for Risk-Based Closure* dated November 21, 2008 (Appendix E).

Based on the information provided in Kleinfelder's, *Request for Risk-Based Closure* report dated November 21, 2008, the NDEP issued a No Further Action (case closure) letter (dated December 11, 2008), a copy of which is provided in Appendix E. In their December 11, 2008 letter, the NDEP states, "based on this review, no contaminants remain in soil or groundwater above action levels or remediation standards at locations UST 2, 11, 12, 13, and 14; therefore the NDEP has determined that no further assessment or remediation is required to be protective of human health and the environment per Nevada Administrative Code 445A.2272(b)." The NDEP closure letter also states, "at UST 8, 10, 15, 16, 17, 18, 19,20 and Alley Black Soil; heating oil remain(s) above action levels or remediation standards in soil. However, based on current land and groundwater uses, NDEP has determined that no further assessment or remediation is required to be protective of human health and the environment per Nevada Administrative Code 445A.227 (2).

It should be noted that the Property is described in the above-mentioned reports as defunct parcel of APN: 011-380-05, which is now a part of the current APN for the Property (APN: 007-311-21). No USTs were discovered on the target Property. The regional groundwater flow direction in vicinity of the Property is assumed to be toward the east/southeast based on surface topography and proximity to the Truckee River.

RECs and HRECs were noted relative to the multiple petroleum hydrocarbon releases discussed above for the Property and adjacent Reno 4th St. Transit facility site, based on review of available reports, and closure letters granted by the NDEP on March 9, 2006 and December 11, 2008.

In summary, and based on review of available reports/documents, recognized environmental conditions (RECs) 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. PCE above the state action level of 5.0 µg/L was discovered in well MW-1 on the Property.
- Following remedial actions, residual petroleum hydrocarbons in soil were noted on the Property.
- Based upon field observations and laboratory analytical results for soil remaining in place at the bottom of on-site soil remediation excavations, groundwater may be impacted below the area of remedial excavation.

- Soil and groundwater beneath and in vicinity of former excavations 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 May 24, 2019 as discussed below. The weather was warm and overcast. 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

As discussed in Section 4.5 above, a Phase II ESA Report was submitted by Ninyo & Moore/Black Eagle Consulting, Inc. on September 16, 2003. That Phase II ESA was conducted on 12 parcels including the Property subject to the Phase I ESA documented herein. That Phase II ESA concluded that several heating oil USTs were located on the parcel adjacent north of the Property (current RTC Transit Facility). The Phase II also concluded that soil and groundwater contained petroleum hydrocarbons and PCE in excess of state action levels. As part of the Phase II ESA, two soil borings were installed on the Property (B-1 and B-2). The potential former boring locations were observed during the site reconnaissance. Pictures of the potential former boring locations are included in Appendix F. Additionally, one groundwater monitoring well (MW-1) was installed on the Property. Evidence of the former monitoring well location was not observed during the site reconnaissance.

Phase II ESA findings are summarized in Kleinfelder's *Letter Report of Findings*, dated September 14, 2007 (Appendix E). A full copy of the Ninyo & Moore Phase II 2003 report was not provided nor located in regulatory file reviews.

Based on the above Phase II findings, the RTC applied for an NDEP Brownfields Program grant which was approved by NDEP in a letter dated June 1, 2007 (provided in Appendix E). NDEP requested that Kleinfelder provide UST removal services. Kleinfelder removed eight USTs from the subject site during December 2007. Details of UST removal activities are discussed in Kleinfelder's *Memorandum* dated December 11, 2007, *Request for Risk-Based Closure* dated December 21, 2007, and *Report of Completion – Underground Storage Tank Removal* dated January 8, 2008 (Appendix E).

In September 2008, RTC contracted Granite Construction Company (Granite) for site preparation activities for the proposed 4th Street Transit Station adjacent north of the Property. During site preparation activities, additional USTs were encountered. Additional 2008 UST removal activities and soil assessment activities are summarized in Kleinfelder's *Request for Risk-Based Closure* dated November 21, 2008 (Appendix E).

Based on the information provided in Kleinfelder's, *Request for Risk-Based Closure* report dated November 21, 2008, the NDEP issued a No Further Action (case closure) letter (dated December 11, 2008), a copy of which is provided in Appendix E. In their December 11, 2008 letter, the NDEP states, "based on this review, no contaminants remain in soil or groundwater above action levels or remediation standards at locations UST 2, 11, 12, 13, and 14; therefore the NDEP has determined that no further assessment or remediation is required to be protective of human health and the environment per Nevada Administrative Code 445A.2272(b)." The NDEP closure letter also states, "at UST 8, 10, 15, 16, 17, 18, 19,20 and Alley Black Soil; heating oil remain(s) above action levels or remediation standards in soil. However, based on current land and groundwater uses, NDEP has determined that no further assessment or remediation is required to be protective of human health and the environment per Nevada Administrative Code 445A.227 (2).

It should be noted that the Property is described in the above-mentioned reports as defunct parcel of APN: 011-380-05, which is now a part of the current APN for the Property (APN: 007-311-21). No USTs were discovered on the target Property. The regional groundwater flow direction in vicinity of the Property is assumed to be toward the east/southeast based on surface topography and proximity to the Truckee River. A long history of industrial usage has existed adjacent north of the Property, and as such, the potential exists for soil and/or groundwater to be impacted beneath the Property by historical adjacent operations. Due to the proximity of the adjacent RTC Transit Station 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.

In summary, RECs and HRECs were noted relative to the multiple heating oil UST releases discussed above for the Property and adjacent Reno 4TH St. Transit facility site, based on review of available reports, and closure letter granted by the NDEP on December 11, 2008.

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 pavement was observed within the boundaries of the Property during the Property reconnaissance. However, the pavement staining was observed to be limited to paved vehicle parking areas and did not appear to affect non-paved surfaces. Staining on the pavement appears to be de-minimis condition. 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

Solid waste generated at the Property is disposed of in commercial dumpsters or recycled. An independent solid waste disposal/recycling contractor removes waste from the Property. No evidence of illegal dumping of solid waste was observed during the site reconnaissance. As such, no RECs from solid waste disposal were known to be present on the Property at the time of the reconnaissance.

5.9 Water, Storm Water, and Wastewater

Evidence of constructed storm water management drainage channels was observed along Lake Street west 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 Asbestos-Containing Material

Asbestos containing material (ACM) is commonly found in buildings constructed prior to the 1980s. A trailer home was observed on the Property at the time of the site reconnaissance. The construction age of the trailer was unknown.

For ACM, should renovation and/or demolition activities be undertaken, then it is recommended that an Asbestos Demolition/Renovation Survey be completed and that all ACM that will be impacted by the demolition and/or renovation be properly abated to comply with federal and state regulations.

5.11 Lead-Based Paint

Lead based paint (LBP) is a hazard in residential properties constructed prior to 1978. A trailer home was observed on the Property at the time of the site reconnaissance. The construction age of the trailer was unknown.

For LBP, it is recommended that future areas to be disturbed be checked prior to disturbance so as to be in compliance with Nevada lead regulation requirements.

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 9, 2006 for the Property.

RECs and HRECs 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. The Property is identified as NDEP Facility ID #D-000725. Environmental records on file with the NDEP include Kleinfelder documents, closure memo, and No Further Action Letter(s). Copies of the available reports/documents are provided in Appendix E.

Broadbent contacted the WCHD with regard to past and/or current environmental issues at the Property. WCHD has identified records on file are located with the NDEP.

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 Ninyo & Moore full Phase II ESA Report could not be located, the age of the trailer home could not be verified, and County and City development records were not reviewed for the Property.

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.

<i>Report Section</i>		<i>REC (Y/N)</i>	<i>CREC (Y/N)</i>	<i>HREC (Y/N)</i>	<i>De Minimis Conditions (Y/N)</i>	<i>Comments</i>
2	Site Description	N	N	N	N	Parking lot with a mobile home trailer and storage containers.
3	User-Provided Information	Y	N	Y	N	Review of Lahontan Phase I 2000 ESA Report
4	Records Review	Y	N	Y	N	RECs associated with potential PCE impacts to groundwater underlying the Property; Residual petroleum hydrocarbon impacts to soil and groundwater from former fuel pipeline on the Property; RECs/HRECs: Former UST heating oil releases and associated remedial activities related to adjacent RTC Transit Facility.
5	Site Reconnaissance	Y	N	Y	Y	De Minimis: Pavement staining related to automobile parking and site operations. HREC: Observed two former soil boring locations on the Property REC: ACM and LBP associated with trailer observed during site visit
6	Interviews	Y	N	Y	N	Review of User provided Phase I ESA 2000 and NDEP records. RECs associated with potential PCE impacts to groundwater underlying the Property; Residual petroleum hydrocarbon impacts to soil and groundwater from former fuel pipeline on the Property; RECs/HRECs: Former UST heating oil releases and associated remedial activities related to adjacent RTC Transit Facility.

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

- The Property overlies/is located within a regional and historic PCE groundwater plume created by adjacent facilities located in proximity of 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.
- Post historic remedial action TPH impacts to soil above Nevada State Reportable concentrations remain in place in multiple locations and at various depths on the Property.
- Based upon observations and laboratory analytical results associated with remediation of an abandoned fuel pipeline on the Property, groundwater may be impacted below the area of remedial excavation.
- As part of a 2003 Phase II ESA investigation, two soil borings were installed on the Property (B-1 and B-2). The soil sample collected from boring B-2 at a depth of 2.5 feet contained a concentration of 2,900 mg/Kg of TPH- oil. Additionally, one groundwater monitoring well (MW-1) was installed on the Property and a water sample collected in 2003 found PCE concentrations above the state action level (5.0 µg/L) at 8.1 µg/L.
- Impacts to soil and groundwater beneath the Property have not been fully assessed. As stated in the NDEP's memo dated February 27, 2006 from Mr. Joe Sawyer, *"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."*
- A long history of industrial usage exists adjacent to and north of the Property. The regional groundwater flow direction in vicinity of the Property is assumed to be toward the south and east based on surface topography and proximity to the Truckee River. Consequently, the potential exists for soil and/or groundwater to be impacted beneath the Property by historical adjacent operations and historic heating oil UST releases discovered during RTC Transit Bus Facility development located to the north.
- RECs associated with ACM and LBP are identified for the Property based on the following:
 - Age of the building and the potential for presence of ACMs and/or LBP;
 - Unknown condition of structural materials potentially containing ACMs and/or LBP; and
 - Undetermined future use of the existing structure on the Property.

For ACM, should renovation and/or demolition activities be undertaken, then it is recommended that an Asbestos Demolition/Renovation Survey be completed and that all ACM that will be impacted by the demolition and/or renovation be properly abated to comply with federal and state regulations.

For LBP, it is recommended that any area to be disturbed be checked prior to disturbance to be in compliance with Nevada lead regulation requirements.

Regarding HRECs, during excavation of fill material for the City of Reno railroad configuration project known as the ReTRAC project (Zone 238), an abandoned 3-inch diameter pipeline was uncovered at the native soil interface on the southern portion of the Property. The pipeline was badly damaged and had, at some point,

discharged diesel fuel onto the soil. To remediate the release, approximately 45 cubic yards of petroleum hydrocarbon impacted soil were excavated from the Property. Subsequently, the NDEP issued a No Further Action (case closure) letter (dated March 9, 2006).

Section 9: Conclusion

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

This ESA has revealed evidence of RECs and HRECs associated with the 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 TPH in soil above Nevada State Reportable concentrations was noted in multiple locations and at various depths on the Property.
- Based on the observations and analytical results of remediation of the abandoned fuel pipeline on the Property, groundwater may be impacted below the area of remedial excavation.
- As part of the 2003 Phase II ESA two soil borings were installed on the Property (B-1 and B-2). The soil sample collected from boring B-2 at a depth of 2.5 feet contained a concentration of 2,900 mg/Kg of oil range petroleum hydrocarbons. Additionally, one groundwater monitoring well (MW-1) was installed on the Property. Groundwater samples collected from MW-1 during the Phase II Assessment on August 11, 2003 indicated concentrations of tetrachloroethene (PCE) above the state action level (5.0 µg/L) at 8.1 µg/L.
- The soil and groundwater beneath 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."*
- The regional groundwater flow direction in the vicinity of the Property is assumed to be toward the east/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 regional groundwater flow direction in the vicinity of the Property is assumed to be toward the east/southeast based on surface topography and proximity to the Truckee River. Subsequently, the potential exists for soil and/or groundwater to be impacted beneath the Property by historical adjacent operations and the historic heating oil UST releases discovered during the RTC Transit Bus Facility development.
- RECs associated with ACM and LBP are identified for the Property based on the following:
 - Age of the building and the potential for presence of ACMs and/or LBP;
 - Unknown condition of structural materials potentially containing ACMs and/or LBP; and

- Undetermined future use of the existing structure on the Property.

For ACM, should renovation and/or demolition activities be undertaken, then it is recommended that an Asbestos Demolition/Renovation Survey be completed and that all ACM that will be impacted by the demolition and/or renovation be properly abated to comply with federal and state regulations. For LBP, it is recommended that any area to be disturbed be checked prior to disturbance to be in compliance with Nevada lead regulation requirements.

It should be noted, RECs regarding ACM/LBP, could be removed should a date of construction be obtained for the mobile home and/or removing it from the Property prior to redevelopment.

Regarding HRECs, during excavation of fill material for the City of Reno railroad configuration project known as the ReTRAC project (Zone 238), an abandoned 3-inch diameter pipeline was uncovered at the native soil interface on the southern portion of the Property. The pipeline was badly damaged and had, at some point, discharged diesel fuel onto the soil. To remediate the release, approximately 45 cubic yards of petroleum hydrocarbon impacted soil was excavated from the Property. Subsequently, the NDEP issued a No Further Action (case closure) letter (dated March 9, 2006).

Section 10: Limitations & Exceptions of Assessment

Broadbent prepared this report for the exclusive use of NDEP and the 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: August 2, 2019

Registration No.: 2300

State of: NV

Section 12: References

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- Washoe County District Health Department, 17 March 2006. RE: ReTrac Closure Strategy.