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PHASE I ENVIRONMENTAL SITE ASSESSMENT

**1 and 55 Sunshine Lane and 40 Kietzke Lane
APN 012-302-14
City of Reno, Washoe County
Nevada**



Prepared for:
Contract No.: DEP17-026
Task No.: MA26-21
McGinley Report No.: BRN067.001

State of Nevada
Department of Conservation & Natural Resources
Division of Environmental Protection
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On behalf of:
the Reno Sparks Indian Colony
December 28, 2020
rev. January 21, 2021

TABLE OF CONTENTS

1.	INTRODUCTION.....	4
1.1	Purpose.....	4
1.2	User Responsibilities.....	4
1.3	Conditions of Contract.....	5
1.4	Scope of Work.....	5
2.	ENVIRONMENTAL SETTING.....	6
2.1	Site Location.....	6
2.2	Regional Physiographic Setting.....	6
2.3	Geologic Conditions.....	6
2.4	Surface Water Conditions.....	6
2.5	Groundwater Conditions.....	6
3.	SITE HISTORY AND HISTORICAL LAND USE.....	7
3.1	Historical Aerial Photographs, Topographic Maps, Sanborn Maps.....	7
3.2	City Directory Listings.....	8
3.3	County Assessor's Office.....	9
3.4	Previous ESA Activities.....	9
4.	RECORDS REVIEW.....	10
4.1	EDR Radius Map Report.....	10
4.2	Nevada Division of Environmental Protection (NDEP).....	11
4.2.1	Division of Environmental Protection.....	11
4.3	Washoe County Health District (WCHD).....	12
4.4	City of Reno Environmental Control Section (ECS).....	12
4.5	Regional PCE Plume.....	13
4.6	EDR Vapor Encroachment Screen.....	13
4.6.1	Tier 1 Screening.....	13
4.6.2	Tier 2 Screening.....	14
5.	SITE RECONNAISSANCE.....	15
5.1	Site Description and Current Usage.....	15
5.2	Methodology.....	15
5.3	Observations During Reconnaissance.....	15
5.3.1	Eastern Portion.....	16
5.3.2	Central Portion.....	16
5.3.3	Southwestern Portion.....	17
5.4	Polychlorinated Biphenyl (PCB) Sources.....	17
5.5	Interview with Current Owner.....	17
5.6	Adjoining Properties.....	18

6.	FINDINGS.....	19
6.1	General Findings.....	19
6.2	Historical Recognized Environmental Conditions.....	20
6.3	Controlled Recognized Environmental Conditions.....	20
6.4	Recognized Environmental Conditions.....	20
6.5	Conclusions.....	20
7.	LIMITATIONS.....	22
7.1	General.....	22
7.2	Data Gaps.....	22
8.	SIGNATURES OF ENVIRONMENTAL PROFESSIONALS.....	23
9.	REFERENCES.....	24

FIGURES

Figure 1	Project Location Map
Figure 2	Site Map

APPENDICES

Appendix A	User Questionnaire
Appendix B	Assessor's Map and Parcel Information
Appendix C	Aerial Photographs, Topographic Maps, and Sanborn Maps
Appendix D	City Directory Listings
Appendix E	EDR Radius Map Report
Appendix F	Regulatory Agency Information
Appendix G	EDR Vapor Encroachment Screen
Appendix H	Site Photographs
Appendix I	Current Owner Documentation
Appendix J	Resumes

EXECUTIVE SUMMARY

This report presents the findings of a Phase I Environmental Site Assessment (ESA) performed on the property addressed at 1 and 55 Sunshine Lane and 40 Kietzke Lane in the City of Reno, Washoe County, Nevada, and hereafter referred to as the Subject Property. McGinley & Associates, Inc. (McGinley) conducted this investigation for the purpose of identifying recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and/or controlled recognized environmental conditions (CRECs) on the Subject Property in accordance with the 2013 ASTM International standard practice for the performance of Phase I Environmental Site Assessments (ASTM E 1527-13). The U.S. Environmental Protection Agency (EPA) has endorsed this practice as satisfying the requirements of All Appropriate Inquiry (AAI). McGinley performed this work for the Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, on behalf of the Reno-Sparks Indian Colony (User).

Findings

- The Subject Property is comprised of approximately 3.63 acres of land identified with Washoe County as Assessor's Parcel Number (APN) 012-302-14. The Subject Property presently includes a two-story office building, a one-story office, and storage yard areas.*
- The Subject Property appears to have largely consisted of irrigated agricultural land from at least the 1930s through 1960s.*
- The southwestern portion of the parcel was first developed with a rural residence by the 1950s. This portion of the parcel was then historically occupied by multiple used car dealers from at least the 1970s through early 2000s. The site was vacant circa 2008 to 2018. In 2018, Vega Asphalt leased the site and ultimately the building was demolished in early 2020. At the time of the site reconnaissance, this portion of the Subject Property was not occupied by a tenant; however, evidence of recent trespassing was observed.*
- The central portion of the parcel appears to have included several small structures during the 1970s and 1980s. Two underground storage tanks (USTs) containing fuel were installed in this area circa 1973 and then were removed in 1993. The existing single story office was constructed in 1995. This portion of the parcel is currently occupied by Owen's Wood Products, a firewood supplier, and historic uses included a used car dealer. At the time of the site reconnaissance, a portable office building was observed which appears to potentially be located beyond the Subject Property boundaries within the adjoining city right-of-way for Kietzke Lane. A 55-gallon drum of hydraulic oil and several aboveground storage tanks (ASTs) were observed. It is suspected that there have been multiple spills of petroleum products due to the filling or dispensing of fuels from the ASTs.*
- The eastern portion of the parcel was developed with the existing two story office building and surrounding storage yard circa the early 1970s. The current occupant, Patrick's Construction Cleanup (PCC), supplies dumpsters to construction sites. Previous tenants are believed to have included automotive salvage and wrecking. The eastern-most corner of the parcel appears to have been utilized by the adjoining landscaping materials company for storage since the 2000s. At the time of the site reconnaissance, it appeared that PCC may perform some automotive repair activities for their fleet vehicles. Multiple 55-gallon drums were observed along the exterior in paved and unpaved areas.*
- The Subject Property was identified as a record in the following databases searched by EDR: Environmental Protection Agency's (EPA) Facility Index Database System (FINDS) and Nevada Underground Storage Tank (UST).*
- Owen's Wood Products received several Occupational Safety and Health Administration (OSHA) violations in 2016 regarding safety equipment. A previous occupant of the Subject Property, Reno Scrap & Steel, located at 41 Sunshine Lane (a historical address corresponding to the central portion of the Subject Property parcel) was equipped with two USTs. Other occupants of the Subject Property were not identified in the regulatory agency databases searched by EDR.*
- According to Washoe County Health District (WCHD) permit records, multiple septic systems have been installed onsite including: one to the west of the 1 Sunshine Lane office*

building in 1970, one to the east of the 55 Sunshine Lane building in 1987, and two within the southwestern portion of the parcel (one to the north of the former building installed in 1995 and an original system which was installed at an unknown date to the west).

- Several complaints have been made to the WCHD for 1 Sunshine Lane regarding illegal dumping of solid wastes and petroleum products. While these reports each appear to be closed, based on the records provided, it is unclear if these complaints were determined to require remedial cleanup actions or not.
- A regional plume of PCE, which has been attributed to historical disposal practices, is known to exist in the vicinity of the Subject Property. McGinley reviewed maps prepared by the Central Truckee Meadows Remediation District (CTMRD) which indicate that a plume of PCE exists in the deeper groundwater beneath the Subject Property, which has been estimated to be below the Nevada state action level of 5 ug/L for PCE. However, a monitoring well located approximately 100 feet west and upgradient of the Subject Property detected PCE at 5.4 ug/L during the first quarter of 2020. As CTMRD wells were not identified on the Subject Property, the current site-specific conditions are unknown at this time.

Historical Recognized Environmental Conditions (HREC)

No historical recognized environmental conditions were found for the Subject Property.

Controlled Recognized Environmental Conditions (CREC)

The following controlled recognized environmental condition was found for the Subject Property:

- Two fuel USTs were removed from the central portion of the Subject Property in 1993. While visible signs of a release were not observed during the removal, the laboratory analytical results identified total petroleum hydrocarbon (TPH) concentrations in two samples which exceeded the 100 mg/kg TPH soil action level. The WCHD granted closure for the systems in April 1993; however, an unknown quantity of soil containing elevated TPH concentrations was closed in place. Impacted soils may be encountered during future construction activities. Additionally, if the land use of the Subject Property should change from commercial/industrial to residential, further investigation may be warranted.

Recognized Environmental Conditions (REC)

The following recognized environmental condition was found for the Subject Property:

- The Subject Property has included various automotive and/or industrial occupants for several decades; however, records regarding operations onsite are limited. Drains and sinks were observed in the buildings which may have received discharges of petroleum products and/or hazardous chemicals. The Subject Property was historically developed with other structures and detailed records of those operations were not identified. Additionally, the Subject Property appears to have been equipped with multiple septic systems. Therefore, the possibility that onsite drains and septic systems have been used for the disposal of petroleum products, degreasers, other automotive fluids, and associated contaminated wastewater cannot be ruled out.

Conclusions

McGinley has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of the property identified as APN 012-302-14 in the City of Reno, Nevada, the property. Any exceptions to, or deletions from, this practice are described in Section 7 of this report.

Upon conclusion of our Phase I ESA, and based on the information reviewed, this assessment has revealed no evidence of recognized environmental conditions or controlled recognized environmental conditions in connection with the Subject Property, except for the following:

- CREC: Two fuel USTs were removed from the central portion of the Subject Property in 1993. While visible signs of a release were not observed during the removal, the laboratory analytical results identified total petroleum hydrocarbon (TPH) concentrations in two samples which exceeded the 100 mg/kg TPH soil action level. The WCHD granted closure for the systems in April 1993; however, an unknown quantity of soil containing elevated TPH concentrations was closed in place. Impacted soils may be encountered during future construction activities. Additionally, if the land use of the Subject Property should change from commercial/industrial to residential, further investigation may be warranted.
- REC: The Subject Property has included various automotive and/or industrial occupants for several decades; however, records regarding operations onsite are limited. Drains and sinks were observed in the buildings which may have received discharges of petroleum products and/or hazardous chemicals. The Subject Property was historically developed with other structures and detailed records of those operations were not identified. Additionally, the Subject Property appears to have been equipped with multiple septic systems. Therefore, the possibility that onsite drains and septic systems have been used for the disposal of petroleum products, degreasers, other automotive fluids, and associated contaminated wastewater cannot be ruled out.

Based on the information reviewed for this assessment, McGinley is of the opinion that additional investigations at the Subject Property are warranted to address the RECs identified in this report.

It should be noted that based on evidence indicating past property development, additional septic systems, domestic groundwater wells, and heating oil tanks may have been utilized on the property. Information was not available regarding the use, abandonment, or removal of such features. Additionally, observations of the interior floors and exterior ground surfaces were limited by vehicles, other items, or snow cover. Therefore, caution should be observed during future site redevelopment. If evidence of these types of features or suspect contamination are encountered during construction activity, proper abandonment and/or further assessment may be necessary and a State of Nevada Certified Environmental Manager (CEM) should be consulted at that time.

Furthermore, building materials onsite may include the presence of lead-based paints and/or asbestos-containing materials. Therefore, McGinley recommends that prior to any renovation, demolition, or other disturbance activities impacting building materials on the Subject Property, a comprehensive asbestos and lead paint survey should be performed by a certified professional.

1. INTRODUCTION

1.1 Purpose

This report presents the findings of a Phase I Environmental Site Assessment (ESA) performed on the property addressed at 1 and 55 Sunshine Lane and 40 Kietzke Lane in the City of Reno, Washoe County, Nevada, and hereafter referred to as the Subject Property. McGinley & Associates, Inc. (McGinley) conducted this investigation for the purpose of identifying recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and/or controlled recognized environmental conditions (CRECs) on the Subject Property in accordance with the 2013 ASTM International standard practice for the performance of Phase I Environmental Site Assessments (ASTM E 1527-13). The U.S. Environmental Protection Agency (EPA) has endorsed this practice as satisfying the requirements of All Appropriate Inquiry (AAI).

As defined in ASTM E 1527-13, the term REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to any release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment. The term REC is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and which generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. A HREC is a past release of any hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (to current regulatory standards) or meets unrestricted residential use criteria established by a regulatory authority, without subjecting the property to institutional controls or engineering controls. A HREC will not be considered a REC per ASTM E 1527-13. To the contrary, a CREC is a REC that has been addressed to the satisfaction of the applicable regulatory authority with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (i.e., property use restrictions, activity use limitations, institutional/engineering controls, etc.).

1.2 User Responsibilities

In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "Brownfields Amendments"), the User must complete an AAI compliant user questionnaire and provide it to the environmental professional. Failure to complete this user questionnaire could result in a determination that "all appropriate inquiry" is not complete. The questionnaire determines a baseline of User knowledge of the Subject Property regarding the following items:

- Question 1: Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25);
- Question 2: Activity and land use limitations that are in place on the site or have been filed or recorded in a registry (40 CFR 312.26);
- Question 3: Specialized knowledge or experience of the person seeking to qualify for the LLP related to the property or nearby properties (40 CFR 312.28);
- Question 4: Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29);
- Question 5: Commonly known or reasonably ascertainable information about the property (40 CFR 312.30); and
- Question 6: The degree of obviousness of the presence or likely presence of contamination in, on, or at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).

In order to obtain this information, an AAI compliant user questionnaire was provided to the User of this Phase I ESA. The completed user questionnaire can be found in Appendix A.

1.3 Conditions of Contract

McGinley performed this work for the Nevada Department of Conservation and Natural Resources, Division of Environmental Protection, on behalf of the Reno-Sparks Indian Colony (User) as part of the State of Nevada Brownfields Program (NBP) pursuant to our proposal dated November 4, 2020 and agreed upon through a Scope of Work Approval task letter dated November 3, 2020. The NBP task number for this project under Contract DEP17-026 is MA26-21.

1.4 Scope of Work

The scope of work performed and procedures utilized included the following tasks:

- **Site reconnaissance** of the Subject Property and observation of adjoining properties and vicinity by a qualified person under the direct supervision of a McGinley Certified Environmental Manager;
- **Environmental setting review** to determine potential pathways for the migration of contaminants including solids and liquids at the surface or subsurface, and vapor in the subsurface;
- **Review of site history/land use** through city directory listings, historical aerial photographs, historical topographic maps, local jurisdiction records, and personal interviews/questionnaires;
- **Review of regulatory agency records** to identify and assess any listings of regulatory permits, registrations, or enforcement actions at the Subject Property, adjoining properties, or proximal sites (if necessary), through both a commercial database search and agency inquiries; and,
- **Preparation of this report** that describes all work performed and presents a discussion of the findings and conclusions.

2. ENVIRONMENTAL SETTING

2.1 Site Location

The Subject Property is currently identified with Washoe County as Assessor's Parcel Number (APN) 012-302-14. The Subject Property is located in Section 7, Township 19 North, Range 20 East, of the Mount Diablo Baseline and Meridian. The location of the site and the property boundary are displayed in Figures 1 and 2. A parcel map from the Washoe County Assessor's Office, which depicts the Subject Property parcel, is provided herein as Appendix B.

2.2 Regional Physiographic Setting

The Subject Property is located within the Basin and Range Physiographic Province at an elevation of approximately 4,450 feet above mean sea level. The climate of the region is described as Mid-Latitude Steppe, which is characterized by cold winters, hot summers, and semi-arid precipitation conditions (Houghton et. al., 1975). Historical average minimum and maximum annual temperatures for the area, as recorded at the nearest climate station in Reno, Nevada, are 34.6 and 67.3 degrees Fahrenheit, respectively, while historical annual precipitation and snowfall averages 7.22 and 22.9 inches, respectively (Western Regional Climate Center, 2016).

2.3 Geologic Conditions

The geology underlying the Subject Property has been mapped as younger Quaternary deposits of the Truckee River alluvium (Ramelli and Henry, 2010). The surficial soils found at the Subject Property have been mapped as including the Oest bouldery sandy loam, the Rose Creek loamy fine sand, and the Notus stony loam fine sand. The units are each classified as hydrologic soil group B, which is characterized by moderately low runoff potential when thoroughly wet as water transmission through the soil is unimpeded (NRCS, 2016).

2.4 Surface Water Conditions

There are no surface water bodies such as streams or wetlands located on the Subject Property. The nearest major surface water body to the Subject Property is the Truckee River, which adjoins the Subject Property to the north. According to the Federal Emergency Management Agency (FEMA), the Subject Property is located outside a 100-year flood zone and is listed as being in Zone X, which is characterized as areas determined to be outside the 0.2% annual chance floodplain.

2.5 Groundwater Conditions

Based on a review of the Nevada Division of Water Resources (NDWR) Well Log Database, no groundwater wells appear to be located on the Subject Property. No wells were observed or reported to be located on the Subject Property during the site reconnaissance. Groundwater flow direction at the Subject Property is estimated to be generally towards the east based on topography. The depth to groundwater is estimated to be approximately 20 to 40 feet below ground surface, based on a review of well logs from the surrounding area.

3. SITE HISTORY AND HISTORICAL LAND USE

A historical assessment of the Subject Property was performed through a search and review of available historical resources including aerial photographs, topographic maps, Sanborn fire insurance maps, city directory records, and county records. The purpose of the historical assessment was to identify previous land uses that may have impacted the Subject Property in the past. A summary of our historical assessment is presented below.

3.1 Historical Aerial Photographs, Topographic Maps, Sanborn Maps

Environmental Data Resources, Inc. (EDR) was contracted to provide available historical aerial photographs, topographic maps, and fire insurance maps covering the vicinity of the Subject Property. To obtain information regarding the history of development on and near the Subject Property, the following resources were reviewed and a summary of findings is presented in the table below. A copy of the historical aerial photographs, topographic maps, and fire insurance maps that were reviewed are provided in Appendix C. Observations of the Subject Property and/or vicinity details were limited in some images due to onsite foliage, or image scale or quality.

Source Reviewed	Date(s)
Aerial Photographs	1939, 1946, 1953, 1959, 1962, 1966, 1972, 1978, 1980, 1984, 1994, 1999, 2006, 2010, 2013, 2017
Topographic Maps	1891, 1893, 1950, 1951, 1967, 1974, 1982, 2015
Sanborn Maps	Not published for the area of the Subject Property.

Direction	Description
Subject Property:	Irrigated agricultural land (1939-1946); southwestern portion of the parcel appears developed with a rural residence and a barn which extends off of the parcel towards the west (1953); barn structure has been demolished as the adjoining existing road (Kietzke Lane) has been developed, residence and agricultural fields remain (1959-1962); southwestern portion of the parcel appears to include an additional small structure, agricultural fields appear fallow (1966); agricultural uses of the parcel have been discontinued and irrigation channels are no longer observed, northern-central portion of the parcel appears to contain soil mounds or excavated areas, potentially a borrow pit or stockpiles, eastern portion of the parcel appears developed with existing office building and surrounding yard contains vehicles and storage (1972); southwestern portion of the parcel include vehicle storage or salvage yards, central portion appears to include an additional structures along Sunshine Lane and Kietzke Lane, tractor trailers or storage structures added within eastern portion of the parcel (1978-1980); soils in central portions of the parcel appear disturbed (1984); storage yard in the eastern portion of the parcel appears utilized for dense accumulations of unknown materials (1994); existing office structure developed in the central portion of the parcel, eastern storage yard appears cleared, exterior areas throughout the entire parcel appear utilized for vehicle parking, storage, or salvage operations (1999); buildings formerly along Kietzke Lane and Sunshine Lane in the central portion of the parcel are no longer visible, central portion of the parcel appears utilized for existing firewood operations, far eastern-most corner of the parcel appears utilized by southeast adjoining landscaping materials company for gravel storage (2006-2017). Since the most recent aerial, the structures in the southwestern portion of the parcel have been demolished.
North:	Irrigated agricultural land and the Truckee River (1939-1953); existing road (Kietzke Lane) developed (1959-2017).
South:	Land developed with an apparent residence in the western portion of the parcel, plus several ancillary structures and an irrigation channel which appear related to surrounding agricultural land uses (1939-1962); adjoining road (Kuenzli Street)

	developed, agricultural uses appear discontinued (1966); eastern structure demolished, parcel appears utilized for vehicle parking and/or storage (1972-1984); structure appears in eastern portion of the parcel along with building/former residence within the western portion of the property, existing shed office and surrounding concrete area appear developed, and exterior areas utilized as vehicle storage yard (1994-2006); site appears largely cleared and consists of vacant land with apparent storage structures and existing shed office remaining, residence appears to have been demolished and exterior areas not actively used for storage (2010-2013); developed with the existing fenced storage yard, shed office, apparent paved wash area, and covered storage areas (2017).
East:	Irrigated agricultural land with a radio tower to the southeast (1939-1959); existing storage yard utilized for vehicles or other materials (1962); existing road (Sunshine Lane) developed, northern portion of APN 012-302-16 consists of vacant or fallow fields, southern portion appears utilized as a parking lot or vehicle storage yard, APN 012-302-15 is developed with the original portion of the existing service garage building (1966); APN 012-302-16 is developed beyond with the existing western and eastern service garage buildings, the existing addition has been constructed to the eastern portion of the garage within APN 012-302-15, existing highway (Interstate 580/Highway 395) under development beyond (1972); scale house building appears developed within APN 012-302-16, exterior areas of the site appears used for vehicle storage or parking, plus unknown materials storage (1978-1980); existing service garage building developed within central portion of APN 012-302-16 (1984-1994); storage yard utilized for landscaping materials (1999); areas within the eastern portion of 012-302-16 appear to have walls added and portions utilized for landscaping materials storage by the east-adjointing property (2006); materials previously observed in exterior yard of the northern portion of APN 012-302-16 appear to have been removed, vehicle storage remains in other areas of the site (2010-2013); site appears generally consistent with present day conditions including existing scale house, four service garage buildings, storage areas, and parked vehicles (2017).
West:	Irrigated agricultural land (1939-1953); existing road (Kietzke Lane) developed (1959-1978); existing water pumphouse and apparent aboveground fuel tanks developed beyond Kietzke Lane (1980-2017).

3.2 City Directory Listings

At the request of McGinley, EDR searched city directory listings for Sunshine Lane, Kietzke Lane, and Kuenzli Lane. City directory listings as published by Polk's City Directory listings were searched for the years: 1932, 1960, 1964, 1967, 1971, 1976, 1981, and 1986. City directory listings as provided by the EDR Digital Archives were searched for the years: 1992, 1995, 2000, 2005, 2010, 2014, and 2017. A copy of the EDR City Directory report that was reviewed is provided in Appendix D.

Addresses currently assigned by the Washoe County Assessor for the Subject Property parcel were identified as 1 and 55 Sunshine Lane and 40 Kietzke Lane. Additional addresses identified during the site visit, in the other historical records reviewed, or suspected to be associated with the parcel based on street numbers identified in the city directories were identified as 41 and 81 Sunshine Lane and 30 Kietzke Lane.

The Subject Property was listed as the following in the city directory listings reviewed. Other listings for the Subject Property were not identified in the city directories reviewed.

- **1 Sunshine Lane:** Payless Plywood (1976, 1981), Hurley's Auto Wrecking (1986, 1989), Sunshine Auto Dismantlers (1992, 1995).
- **41 Sunshine Lane:** No listings.

- **55 Sunshine Lane:** Owen's Trucking Service (2005, 2010), Owen's Wood Products (2014, 2017).
- **81 Sunshine Lane:** No listings.
- **30 Kietzke Lane:** Warren's Lawn Sprinkling Co (1977).
- **40 Kietzke Lane:** Reno Car Corral (1971), Northern Nevada Enterprises (1987), Instant Enterprises LLC (2000, 2005, 2010).

3.3 County Assessor's Office

According to the Washoe County Assessor's Office, the Subject Property is identified as APN 012-302-14. The land use code of the Subject Property is *General Commercial* and the zoning code is *All - Industrial*. The Subject Property is listed as 3.63 acres in size. The Subject Property is listed as improved with two buildings: a 2,100 square foot light commercial utility building constructed in 1984 and a 240 square foot "office shed" building constructed in 1995. It should be noted that aerial photographs indicate the two story building was present by 1972. Additional improvements listed include a wood shed dated 1960 and a masonry shed dated 1984, plus various fencing and pavement dating back to 1960. The current property owner is Sunshine Industrial, LLC, which has owned the property since 2015. Previous property owners listed include: the Marsh Family Trust (1997-2015) and Robert Marsh (1971-1997). Ownership records prior to 1971 were not provided in the information available for review.

It should be noted that the tenant Owen's Wood Products utilizes a portable office building for their business operations onsite; however, based on the Assessor's aerial depiction of the Subject Property boundaries, the portable office may lie beyond the parcel boundary within the municipal right-of-way for the adjoining Kietzke Lane. Additionally, the southeastern-most portion of the parcel appears to be utilized by the adjoining landscaping materials business which operates on the parcel owned by the Reno-Sparks Indian Colony/USA Trustee.

3.4 Previous ESA Activities

Previous ESA reports prepared for the Subject Property were not provided by the User and were not identified in the public records reviewed within the scope of this report.

4. RECORDS REVIEW

A regulatory agency review was conducted through both a commercial database search and local agency inquiries. The purpose of this regulatory agency review was to ascertain if regulatory actions have ever been imposed on the Subject Property, adjoining properties, or on properties within the search radius guidelines established by the 2013 ASTM Standard Practice for Environmental Site Assessments.

4.1 EDR Radius Map Report

At the request of McGinley, EDR provided records from federal, state, and local environmental databases for regulatory sites located within the *Approximate Minimum Search Distances* as specified in ASTM E 1527-13. A copy of the EDR report is included herein as Appendix E. Included within the report are summaries of the regulatory databases reviewed, a listing of sites identified within the search radius, detailed data on the identified sites, and maps showing the locations of facilities reported to have had regulatory action. The number of listed sites identified within the *Approximate Minimum Search Distances* are summarized in the following table. Detailed information for selected sites is provided in the following section, along with an opinion about the significance of the listing to the analysis of *recognized environmental conditions* in connection with the Subject Property.

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
NPL	Not Listed	1.25	0	0	0	0	0	0
Proposed NPL	Not Listed	1.25	0	0	0	0	0	0
NPL LIENS	Not Listed	1.25	0	0	0	0	0	0
Delisted NPL	Not Listed	1.25	0	0	0	0	0	0
CORRACTS	Not Listed	1.25	0	0	0	0	0	0
RCRA-TSDF	Not Listed	0.75	0	0	0	NR	NR	0
RCRA-LQG	Not Listed	0.5	0	0	1	NR	NR	1
RCRA-SQG	Not Listed	0.5	0	0	1	NR	NR	1
US ENG CONTROLS	Not Listed	0.75	0	0	0	NR	NR	0
ERNS	Not Listed	0.25	0	0	NR	NR	NR	0
LUCIS	Not Listed	0.75	0	0	0	NR	NR	0
FINDS	X	0.25	6	7	NR	NR	NR	16
US INST CONTROLS	Not Listed	0.75	0	0	0	NR	NR	0
RCRA-VSQG	Not Listed	0.5	1	2	12	NR	NR	15
ECHO	Not Listed	0.25	6	7	NR	NR	NR	13
SEMS	Not Listed	0.75	0	0	0	NR	NR	0
SEMS-ARCHIVE	Not Listed	0.75	0	0	0	NR	NR	0
RCRA NonGen / NLR	Not Listed	0.5	3	3	43	NR	NR	49
NV LUST	Not Listed	0.75	0	0	1	1	NR	2
NV SHWS	Not Listed	1.25	2	2	17	42	47	110
NV UST	X	0.5	1	3	15	89	NR	108
CA HAZNET	Not Listed	TP	NR	NR	NR	NR	NR	1

The Subject Property was identified as a record in the following databases searched by EDR: Environmental Protection Agency's (EPA) Facility Index Database System (FINDS) and Nevada Underground Storage Tank (UST). The current tenant Owen's Wood Products, located at 55 Sunshine Lane, was identified in the FINDS database as the facility received several Occupational Safety and Health Administration (OSHA) violations. According to information reviewed via OSHA inspection records online, several safety violations were cited in 2016 regarding equipment, ladders, and fire extinguisher requirements. It appears that the OSHA case has been closed. Additionally, a previous occupant of the Subject Property, Reno Scrap & Steel, identified as located at 41 Sunshine Lane (which is understood to be a historical address corresponding to the Subject Property parcel) was equipped with two USTs. According to EDR,

one 10,000-gallon diesel UST and one 12,000-gallon diesel UST were installed onsite in 1973. Records regarding these USTs were reviewed, see Sections 4.2 and 4.3 of this report. Other occupants of the Subject Property were not identified in the regulatory agency databases searched by EDR.

Additionally, the east-adjointing and downgradient property was identified as including facilities within the following databases: Resource Conservation and Recovery Act (RCRA) Very Small Quantity Generator (VSQG) and solid waste recycling database (SWRCY). The information provided by EDR indicates that Reno Auto Body Shop, 1975 Kuenzli Street, has operated as a RCRA generator since at least 1989. Reno Auto Body Shop appears to have been intermittently inspected and it does not appear that RCRA waste generation violations were identified; however, the facility appears to have operated onsite prior to the first RCRA record. Additionally, American Salvage, 1915 Kuenzli Street, was identified as a recycler of radiators and scrap metal.

The southeast-adjacent and cross to downgradient property, 90 Sunshine Lane, was identified in the RCRA Non-Generator/No-Longer-Regulated (NonGen/NLR) and California Hazardous Waste Tracking System (HAZNET) databases. The information provided by EDR indicates that Ralph's Auto Body operated as a RCRA generator circa 1995 to 2013. According to HAZNET records, the operators disposed of oxygenated solvents offsite between 1995 and 2004. The Ralph's facility appears to have operated onsite prior to the first RCRA designation or waste disposal record noted.

The remaining sites identified in the EDR Radius Map Report were reviewed and were not researched further because they are considered unlikely to have caused environmental impacts to the Subject Property. The sites appear to be located far from the Subject Property; are at locations that are considered likely to be hydrologically downgradient from, or crossgradient to, the Subject Property; have had no reported releases; have had no reported violations of hazardous waste regulations; have received regulatory closure; and/or were not identified as a standard environmental record per ASTM.

The EDR database search also identified a number of sites that could not be mapped due to insufficient address information. McGinley reviewed these sites and determined that the sites are located far from the Subject Property; are at locations that are considered likely to be hydrologically downgradient from, or crossgradient to, the Subject Property; have had no reported releases; have had no reported violations of hazardous waste regulations; and/or have received regulatory closure. For this reason, the unmapped sites are considered unlikely to cause, or to have caused in the past, environmental impact to the Subject Property.

4.2 Nevada Division of Environmental Protection (NDEP)

The regulatory agency review identified one regulatory site administered by the NDEP that could potentially impact the Subject Property. Information obtained from the NDEP is provided below.

4.2.1 Division of Environmental Protection

A review of the available files revealed that one 10,000-gallon diesel UST and one 12,000-gallon diesel UST were installed at 41 Sunshine Lane in 1973. A tank registration completed by Robert Marsh for Reno Scrap & Steel in 1991 indicates the tanks were single-walled steel tanks with galvanized steel piping. The tanks were removed in 1993 and a site assessment reportedly did not detect evidence of a leak. Further records regarding these USTs were reviewed via the Washoe County Health District (WCHD), see Section 4.3 of this report.

4.3 Washoe County Health District (WCHD)

On November 4, 2020, an inquiry regarding inspections, complaints, spills, USTs, or other potential environmental issues in connection with the Subject Property was submitted via electronic mail to WCHD. On November 5, 2020, WCHD personnel replied by email indicating that their office identified a UST case file and several other records for the Subject Property.

In addition to the information obtained from the NDEP Bureau of Corrective Actions, the UST Division of the WCHD maintains records for the Subject Property. According to the file reviewed, the two USTs were removed in 1993 and a WCHD representative oversaw the closure process. The USTs were reportedly aligned end-to-end rather than side by side, therefore soil confirmation samples included one sample from the east end, one from the west end, and a composite sample from the middle area of the excavation. While visible signs of a release were not observed during the removal, the laboratory analytical results identified total petroleum hydrocarbon (TPH) concentrations in the western and middle samples at 120 and 290 mg/kg TPH respectively, which both exceeded the 100 mg/kg TPH soil action level. The WCHD granted closure for the systems in April 1993 as impacts to public health or the environment were not anticipated by the WCHD at the time of closure. However, it should be noted that soil contamination appears to have remained in place and impacted soils may be encountered during future construction activities. Regulatory agency records are included as Appendix F.

Additionally within the WCHD UST file for 41 Sunshine Lane, it was noted that the former Subject Property owner Robert Marsh contacted the WCHD in 1995. According to the information provided, a hydraulic lift line had ruptured. In order to repair the broken line, concrete and soils were excavated within a shop. The exact location of the lift was not specified but it is known that Mr. Marsh owned south-adjointing parcels which include several automotive service shops. According to the records provided, visually contaminated soil was encountered and reportedly excavated; however, documentation of offsite soil disposal or post-excavation soil sampling were not identified.

According to WCHD permit records, multiple septic systems have been installed onsite. In 1970, a septic system was installed within APN 012-302-14 to the west of the 1 Sunshine Lane office building. In 1987, a septic system was installed within APN 012-302-14, to the east of the 55 Sunshine Lane building. Also noted in the 1987 permit was the location of an "existing dispenser" proximal to Kietzke Lane, which may correspond to fuel tank dispensers (see above paragraphs). In 1995, a septic system was installed within APN 012-302-14 at 40 Kietzke Lane, identified as the address assigned to the former structure within the southern portion of the parcel. Maps indicate the new system was installed to the north of the building and an original septic system was located to the west of the building.

Several complaints have been made to the WCHD for 1 Sunshine Lane regarding illegal dumping of solid wastes and petroleum products. While these reports each appear to be closed, based on the records provided, it is unclear if these complaints were determined to require remedial cleanup actions or not. Other records for the Subject Property were not identified.

4.4 City of Reno Environmental Control Section (ECS)

On November 4, 2020, an inquiry regarding inspections, complaints, spills, underground storage tanks, hazardous materials or petroleum products, building department records related to potential heating oil or HVAC equipment, or other potential environmental issues in connection with the Subject Property was submitted via an online public records request to the City of Reno. On the same day, City of Reno personnel replied indicating that one responsive record for the Subject Property was identified. According to the record provided, a motorhome located along the exterior of the Subject Property parcel, parked on Sunshine Lane, was determined to be intentionally discharging black water to the street. The issue appears to have been resolved and was related to the transient occupant of the motorhome rather than the operator or owner of the Subject Property. Other records for the Subject Property were not identified.

4.5 Regional PCE Plume

A plume of the organic solvent perchloroethylene (PCE), which has been attributed to historical disposal practices, is known to exist throughout much of the Reno-Sparks area, including the vicinity of the Subject Property. In order to address the PCE issue, the NDEP and the WCHD created a "remediation district" in 1998 known as the Central Truckee Meadows Remediation District (CTMRD) whose purpose included gathering detailed background information on the problem, providing a listing of recommended actions, defining the boundaries of the CTMRD, and evaluating remediation (cleanup) costs. Because the issue is a regional problem, it is considered unlikely that responsible parties will be named. In addition, it appears that innocent landowners within the district may be exempt from liability through legislation passed by the State of Nevada. Nevada Revised Statutes 540.260 Part 4 states that, *"An owner or lessee of property within the district who did not cause or contribute to the condition which the district was created to remedy is not subject to criminal or civil liability, including, without limitation, any liability for the cost of remediation or any related damage or injury caused by the condition, except to the extent of any unpaid assessments levied against the property."*

McGinley reviewed PCE plume maps prepared by the CTMRD for the first Quarter of 2020. The review of these maps indicates that a low-concentration plume of PCE exists in the deeper groundwater beneath the Subject Property which may range from 0.5 micrograms per liter (ug/L) to 5 ug/L, which is below the Nevada state action level of 5 ug/L for PCE. During the first quarter sampling, a monitoring well located on the west-adjointing TMWA property beyond Kietzke Lane, approximately 100 feet west and upgradient of the Subject Property ("KIETZKE") detected PCE at 5.4 ug/L. As CTMRD wells were not identified on the Subject Property, the current site-specific conditions are unknown at this time.

4.6 EDR Vapor Encroachment Screen

McGinley conducted a Vapor Encroachment Screen (VES) investigation in accordance with the 2015 ASTM Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions (ASTM E 2600-15). The VES investigation used available information and professional judgment to derive our conclusions. The goal of the VES investigation was to identify the potential for vapors from hazardous substances and petroleum releases to reach the Subject Property. ASTM E2600-15 defines the term, vapor encroachment condition (VEC) as the presence or likely presence of chemical of concern (COC) vapors in the vadose zone of the Subject Property caused by the release of vapors from contaminated soil and/or groundwater either on or near the Subject Property as identified by Tier 1 or Tier 2 procedures. McGinley performed a VES investigation for the area encompassing the Subject Property by reviewing each of the regulatory sites that were provided by EDR within a 1/3-mile primary search radius from the boundary of the Subject Property.

4.6.1 Tier 1 Screening

Initially, 95 site listings were identified by EDR within the 1/3-mile primary search radius surrounding the Subject Property. Of these initial 95 sites, 93 were excluded because they were determined to be outside the area of concern for vapor migration based on distance, estimated hydrologic gradient, and chemical of concern (COC); were not identified as a *standard environmental record* within the default approximate minimum search distance per ASTM; were determined to have limited potential for the presence of COCs; and/or were determined to be beyond the critical distance for vapor migration to the Subject Property per ASTM. For the remaining listings, located on the Subject Property, a Tier 2 Screening was performed. McGinley additionally identified known regional contamination with subsurface impacts in the vicinity of the Subject Property, see Section 4.5 of this report. For the remaining site, the Central Truckee Meadows Remediation District, a Tier 2 Screening was performed.

4.6.2 Tier 2 Screening

According to the records reviewed in Sections 3 and 4 of this report, operations within the Subject Property are known or suspected to have utilized hazardous materials and/or petroleum products. Detailed records of waste disposal or historical operations were not readily available. Additionally, the Subject Property was identified as historically equipped with onsite septic systems. As the potential for improper hazardous waste or petroleum product disposal to a septic system, spills, or other releases cannot be ruled out, a VEC cannot be ruled out. Furthermore, according to the corrective action reports reviewed in Section 4.3, residual diesel contaminated soil originating from a release occurring prior to 1993 was present within the Subject Property. As such, a potential VEC cannot be ruled out.

The 2020 PCE plume map prepared by the CTMRD indicates that a low-concentration plume of PCE exists in the deeper groundwater beneath the Subject Property. The PCE concentration in the CTMRD groundwater plume beneath the Subject Property is likely below the Nevada state action level of 5 ug/L for PCE. Due to the presence of documented groundwater contamination by a COC (PCE), a VEC exists at the Subject Property per ASTM E2600-15. However, the regional groundwater contamination does not appear to represent a REC to the site at this time. A copy of the VES report is included herein as Appendix G.

5. SITE RECONNAISSANCE

5.1 Site Description and Current Usage

The Subject Property is comprised of approximately 3.63 acres of land and consists of a two-story office building, a one-story office building, and exterior storage yard areas. The property is accessed from the east via Sunshine Lane, the south via Kuenzli Street, and the west via Kietzke Lane. Utilities supplied to the Subject Property area include electric power (NV Energy), natural gas (NV Energy), sewer (City of Reno), and water (Truckee Meadows Water Authority). Additionally, records of onsite septic systems were identified by the WCHD.

5.2 Methodology

For the purpose of assessing current site conditions, a visit to the Subject Property and surrounding area was conducted on November 9, 2020 under partly cloudy and cold conditions. Some of the ground surface was covered by materials storage, was covered in snow, or was wet from precipitation, which limited observations during the site visit. During the site visit, observations were made in regards to RECs, *de minimis* conditions, and general site characteristics. Photographs taken during the site reconnaissance are provided in Appendix H.

5.3 Observations During Reconnaissance

The accessible portions of the site were walked and observed for the presence of RECs. The following is a list of some of the items of interest that were looked for during the site visit. If the item was observed during the site visit, it will be noted as such. A description of the findings during the site visit follows in the section below.

Item or Feature	Observed
Staining or discoloration of soil and/or pavement	X
Wastewater systems, septic systems, sumps, and/or seeps	X
Wells	
Patched areas of asphalt or concrete	X
Standing surface water, ponds, farm tanks, etc.	
Railroad spurs	
Suspect or possible PCB containing equipment	
Hydraulic Equipment	X
Underground storage tank (UST) systems/vent pipes	
Aboveground storage tanks (ASTs)/bulk storage containers	X
Sand-oil separators or grease interceptors	
Paint booths, spray rigs, etc.	
Unorthodox heating and ventilation systems	
Emergency generators	
Petroleum products, chemical/waste generation and/or storage	X
Unusual odors	
Dumping, disturbed soils, direct burial activity	X
Floor drains	
Air quality control equipment, air emissions, or smoke stacks	
Industrial or manufacturing activities	
Stressed vegetation	
Oil or gas well exploration or refinery activities	
Surface water contamination	
Farm waste, feed lot spoils, or manure stockpile	
Prolonged use, misapplication or storage of pesticides	
Discharges, or run-off of potential contaminants from off-site sources	
Basements and/or subsurface vaults	

5.3.1 Eastern Portion

At the time of the site reconnaissance, the eastern portion of the Subject Property was occupied by Patrick's Construction Cleanup (PCC). PCC is understood to store dumpsters and trucks onsite which are used to provide waste dumpsters to construction sites. The dumpsters are then hauled to an offsite landfill for disposal of the collected materials. The interior of the two-story building generally contained offices, restrooms, and storage areas. The storage areas included an air compressor, washing machine and dryer, and miscellaneous material storage. Limited quantities of household cleaning agents and paints are utilized and stored by the existing tenant for maintenance purposes. These products were stored in containers that were five gallons in volume or less. Chicken wire fenced kennel areas were observed in the upstairs area which indicate animals may have resided inside the building at some point. The restroom onsite was observed to contain a bucket in the sink to capture washwater, indicating a potential issue with the plumbing system.

Along the eastern exterior of the building, a covered garage area was observed. It appears that the tenant may perform some automotive repair activities for their fleet vehicles, as evidenced by a truck which appeared to have recently been worked on in the paved area along the garage space. Multiple 55-gallon drums were observed inside the covered area upon concrete pavement; however, several additional drums were observed along the exterior in an unpaved area. Labeling on some of the drums indicated contents such as antifreeze and petroleum oils; however, several drums were unlabeled. The drums appeared in generally fair condition with some visible staining; however, it should be noted that observations of the ground surface in these areas was limited by snow. Capped piping along the exterior of the building may correspond to a septic or sewer cleanout.

The exterior storage yard areas of this portion of the property included gravel covered parking areas, parked vehicles, and empty dumpster storage. *De minimis* staining was observed in the parking lot which appears to be a result of drips from parked vehicles. Fencing south of the garage area implies a property boundary; however, the Washoe County assessor maps indicate the parcel extends to the southeast. This area appears utilized by the adjoining landscaping materials tenant of the southeast-adjointing parcel.

5.3.2 Central Portion

At the time of the site reconnaissance, the central portion of the Subject Property was occupied by Owen's Wood Products, a firewood supplier. Owen's utilizes a portable building for administrative offices. It should be noted that based on parcel maps reviewed, the portable office building appears to potentially be located beyond the Subject Property boundaries in the adjoining city right-of-way for Kietzke Lane.

The central portion also included a small office building which included a restroom. The interior of the building appeared utilized for the storage of a 55-gallon drum of hydraulic oil. Staining and petroleum odors were observed within the building, it was unclear if staining in the restroom was related to normal use or potential disposal of regulated fluids. Several aboveground storage tanks (ASTs) and a portable oil change pan were observed along the exterior of the building. The contents of the ASTs is not currently known, but are suspected to contain fuel for onsite or fleet vehicles, and potential a heating oil tank for the building. It is suspected that there have been multiple spills of petroleum products due to the filling or dispensing of fuels from the ASTs, as evidenced by sawdust on the ground surface which appeared utilized as an absorbent material. Capped piping along the exterior of the building may correspond to a septic or sewer cleanout.

The exterior storage yard areas of this portion of the property included firewood and timber storage, bare soil, and parked vehicles and construction equipment. Due to recent precipitation, it was difficult to identify areas of soil staining versus damp soils.

5.3.3 Southwestern Portion

At the time of the site reconnaissance, the southwestern portion of the Subject Property was not occupied by a tenant; however, evidence of trespassing by unsheltered people was observed. This portion of the Subject Property does not currently contain structural improvements, but concrete paved areas appeared related to foundations of former structures onsite. Scattered areas of dumped debris were observed. Evidence of dumped petroleum products or hazardous substances was not observed during the site reconnaissance.

5.4 Polychlorinated Biphenyl (PCB) Sources

PCBs are man-made chemicals known to have potential harmful effects on human health and the environment. Federal law banned U.S. production of PCBs as of July 2, 1979. However, PCB-containing materials may still be present in electrical equipment manufactured prior to 1979. Because the building on the Subject Property was originally constructed before 1979, the presence of PCB-containing equipment at the site cannot be ruled out. However, no privately owned electrical transformers were observed during site reconnaissance. Pole-mounted electrical transformers were observed and are suspected to be maintained by NV Energy. The transformers appeared to be in good condition with no observed leaks. Furthermore, NV Energy has indicated that they no longer use PCB-containing oils in their transformers and make every effort to remove PCB-containing transformers and replace them with environmentally safer equipment.

5.5 Interview with Current Owner

An environmental questionnaire was completed by Ms. Kimberly Marsh Guinasso, Manager of Sunshine Industrial, LLC, the current owner of the Subject Property. The environmental questionnaire was intended to gather information from the current owner regarding the past uses of the Subject Property and its adjoining properties. Ms. Guinasso also provided a narrative of her knowledge of the Subject Property and surrounding parcels which were historically owned by her father, Robert Marsh, prior to his death. The provided documents are included Appendix I. The following paragraphs summarize the information provided by Ms. Guinasso.

The eastern portion of the parcel, 1 Sunshine Lane, has been occupied by Patrick's Construction Cleanup for many years. This company is understood to supply dumpsters to construction sites. The historic uses of the property included storage of dumpsters and trucks. Ms. Guinasso was not aware of the nature of a prior businesses occupying this location. The building onsite is understood to have always served as an office and storage building.

The central portion of the parcel, 55 Sunshine Lane, has been occupied by Owen's Wood Products for many years. This company is understood to supply firewood to the public. The historic uses of the property included a used car dealer. Prior to the mid 1990s, the property was briefly developed in anticipation of a bus company tenant, including the installation of one or more underground fuel storage tanks. The bus company does not appear to have occupied the site and the tanks were removed. The building onsite is understood to only include a small office and restroom.

The southwestern portion of the parcel, 40 Kietzke Lane, was historically occupied by multiple used car dealers. The site was vacant circa 2008 to 2018. In 2018, Vega Asphalt leased the site and began remodeling of the structure onsite without a permit from the City of Reno and in violation of their lease. When Vega Asphalt then applied for a business license with the City, they were unwilling or unable to meet all the requirements from the City of Reno. Therefore, Vega Asphalt entered into an agreement with Sunshine Industrial to complete the demolition of the building onsite in early 2020 to the satisfaction of the City, in exchange for early termination of their lease.

Ms. Guinasso stated that the two buildings remaining onsite are believed to be served by septic systems. It was noted that Sunshine Industrial, LLC receives a sewer bill for "44-54 Kietzke Lane" and it is unknown if sewer service specifically extends to the Subject Property parcel.

5.6 Adjoining Properties

The Subject Property is bordered by the following:

Direction	Description
North:	The Truckee River and Kietzke Lane.
South:	Kuenzli Lane with a trucking company beyond.
East:	Sunshine Lane with automotive service garages, a landscaping materials company, and Interstate 580/Highway 395 beyond.
West:	Kietzke Lane with vacant land and a TMWA groundwater pump station beyond.

At the time of the site visit, the properties immediately surrounding the Subject Property consisted primarily of commercial and light industrial properties. The west-adjoining TMWA facility is discussed in Section 4.5 of this report as it pertains to a regional groundwater contamination plume. Reconnaissance of the other publicly accessible portions of the properties located immediately adjoining to the Subject Property did not reveal visible evidence of environmental concerns impacting the Subject Property.

6. FINDINGS

6.1 General Findings

- The Subject Property is comprised of approximately 3.63 acres of land identified with Washoe County as Assessor's Parcel Number (APN) 012-302-14. The Subject Property presently includes a two-story office building, a one-story office, and storage yard areas.
- The Subject Property appears to have largely consisted of irrigated agricultural land from at least the 1930s through 1960s.
- The southwestern portion of the parcel was first developed with a rural residence by the 1950s. This portion of the parcel was then historically occupied by multiple used car dealers from at least the 1970s through early 2000s. The site was vacant circa 2008 to 2018. In 2018, Vega Asphalt leased the site and ultimately the building was demolished in early 2020. At the time of the site reconnaissance, this portion of the Subject Property was not occupied by a tenant; however, evidence of recent trespassing was observed.
- The central portion of the parcel appears to have included several small structures during the 1970s and 1980s. Two underground storage tanks (USTs) containing fuel were installed in this area circa 1973 and then were removed in 1993. The existing single story office was constructed in 1995. This portion of the parcel is currently occupied by Owen's Wood Products, a firewood supplier, and historic uses included a used car dealer. At the time of the site reconnaissance, a portable office building was observed which appears to potentially be located beyond the Subject Property boundaries within the adjoining city right-of-way for Kietzke Lane. A 55-gallon drum of hydraulic oil and several aboveground storage tanks (ASTs) were observed. It is suspected that there have been multiple spills of petroleum products due to the filling or dispensing of fuels from the ASTs.
- The eastern portion of the parcel was developed with the existing two story office building and surrounding storage yard circa the early 1970s. The current occupant, Patrick's Construction Cleanup (PCC), supplies dumpsters to construction sites. Previous tenants are believed to have included automotive salvage and wrecking. The eastern-most corner of the parcel appears to have been utilized by the adjoining landscaping materials company for storage since the 2000s. At the time of the site reconnaissance, it appeared that PCC may perform some automotive repair activities for their fleet vehicles. Multiple 55-gallon drums were observed along the exterior in paved and unpaved areas.
- The Subject Property was identified as a record in the following databases searched by EDR: Environmental Protection Agency's (EPA) Facility Index Database System (FINDS) and Nevada Underground Storage Tank (UST).
- Owen's Wood Products received several Occupational Safety and Health Administration (OSHA) violations in 2016 regarding safety equipment. A previous occupant of the Subject Property, Reno Scrap & Steel, located at 41 Sunshine Lane (a historical address corresponding to the central portion of the Subject Property parcel) was equipped with two USTs. Other occupants of the Subject Property were not identified in the regulatory agency databases searched by EDR.
- According to Washoe County Health District (WCHD) permit records, multiple septic systems have been installed onsite including: one to the west of the 1 Sunshine Lane office building in 1970, one to the east of the 55 Sunshine Lane building in 1987, and two within the southwestern portion of the parcel (one to the north of the former building installed in 1995 and an original system which was installed at an unknown date to the west).
- Several complaints have been made to the WCHD for 1 Sunshine Lane regarding illegal dumping of solid wastes and petroleum products. While these reports each appear to be closed, based on the records provided, it is unclear if these complaints were determined to require remedial cleanup actions or not.
- A regional plume of PCE, which has been attributed to historical disposal practices, is known to exist in the vicinity of the Subject Property. McGinley reviewed maps prepared by the Central Truckee Meadows Remediation District (CTMRD) which indicate that a plume of PCE exists in the deeper groundwater beneath the Subject Property, which has been estimated to be below the Nevada state action level of 5 ug/L for PCE. However, a

monitoring well located approximately 100 feet west and upgradient of the Subject Property detected PCE at 5.4 ug/L during the first quarter of 2020. As CTMRD wells were not identified on the Subject Property, the current site-specific conditions are unknown at this time.

6.2 Historical Recognized Environmental Conditions

No *historical recognized environmental conditions* were found for the Subject Property.

6.3 Controlled Recognized Environmental Conditions

The following *controlled recognized environmental condition* was found for the Subject Property:

- Two fuel USTs were removed from the central portion of the Subject Property in 1993. While visible signs of a release were not observed during the removal, the laboratory analytical results identified total petroleum hydrocarbon (TPH) concentrations in two samples which exceeded the 100 mg/kg TPH soil action level. The WCHD granted closure for the systems in April 1993; however, an unknown quantity of soil containing elevated TPH concentrations was closed in place. Impacted soils may be encountered during future construction activities. Additionally, if the land use of the Subject Property should change from commercial/industrial to residential, further investigation may be warranted.

6.4 Recognized Environmental Conditions

The following *recognized environmental condition* was found for the Subject Property:

- The Subject Property has included various automotive and/or industrial occupants for several decades; however, records regarding operations onsite are limited. Drains and sinks were observed in the buildings which may have received discharges of petroleum products and/or hazardous chemicals. The Subject Property was historically developed with other structures and detailed records of those operations were not identified. Additionally, the Subject Property appears to have been equipped with multiple septic systems. Therefore, the possibility that onsite drains and septic systems have been used for the disposal of petroleum products, degreasers, other automotive fluids, and associated contaminated wastewater cannot be ruled out.

6.5 Conclusions

McGinley has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of the property identified as APN 012-302-14 in the City of Reno, Nevada, the property. Any exceptions to, or deletions from, this practice are described in Section 7 of this report.

Upon conclusion of our Phase I ESA, and based on the information reviewed, this assessment has revealed no evidence of recognized environmental conditions or controlled recognized environmental conditions in connection with the Subject Property, except for the following:

- CREC: Two fuel USTs were removed from the central portion of the Subject Property in 1993. While visible signs of a release were not observed during the removal, the laboratory analytical results identified total petroleum hydrocarbon (TPH) concentrations in two samples which exceeded the 100 mg/kg TPH soil action level. The WCHD granted closure for the systems in April 1993; however, an unknown quantity of soil containing elevated TPH concentrations was closed in place. Impacted soils may be encountered during future construction activities. Additionally, if the land use of the Subject Property should change from commercial/industrial to residential, further investigation may be warranted.
- REC: The Subject Property has included various automotive and/or industrial occupants for several decades; however, records regarding operations onsite are limited. Drains and

sinks were observed in the buildings which may have received discharges of petroleum products and/or hazardous chemicals. The Subject Property was historically developed with other structures and detailed records of those operations were not identified. Additionally, the Subject Property appears to have been equipped with multiple septic systems. Therefore, the possibility that onsite drains and septic systems have been used for the disposal of petroleum products, degreasers, other automotive fluids, and associated contaminated wastewater cannot be ruled out.

Based on the information reviewed for this assessment, McGinley is of the opinion that additional investigations at the Subject Property are warranted to address the RECs identified in this report.

It should be noted that based on evidence indicating past property development, additional septic systems, domestic groundwater wells, and heating oil tanks may have been utilized on the property. Information was not available regarding the use, abandonment, or removal of such features. Additionally, observations of the interior floors and exterior ground surfaces were limited by vehicles, other items, or snow cover. Therefore, caution should be observed during future site redevelopment. If evidence of these types of features or suspect contamination are encountered during construction activity, proper abandonment and/or further assessment may be necessary and a State of Nevada Certified Environmental Manager (CEM) should be consulted at that time.

Furthermore, building materials onsite may include the presence of lead-based paints and/or asbestos-containing materials. Therefore, McGinley recommends that prior to any renovation, demolition, or other disturbance activities impacting building materials on the Subject Property, a comprehensive asbestos and lead paint survey should be performed by a certified professional.

7. LIMITATIONS

7.1 General

The conclusions and recommendations presented are based upon the agreed scope of work outlined herein. McGinley makes no warranties or guarantees as to the accuracy or completeness of information obtained from others. It is possible that information exists beyond the scope of this investigation. Additional information, which is not available to McGinley at the time of writing the report, may result in a modification of the conclusions and recommendations presented. The services performed by McGinley have been conducted in a manner consistent with the level of care ordinarily exercised by members of our profession currently practicing under similar conditions. This report is not a legal opinion, but may under certain circumstances be prepared at the direction of counsel, may be in anticipation of litigation, and may be classified as an attorney-client communication or as an attorney work product.

This report has been prepared for the sole use of the addressee(s) of this report, and cannot be released without consent from McGinley. If a third party relies on the information provided in this report, McGinley accepts no responsibility for damages suffered by the third party as a result of reliance of information contained in this report, and that nothing contained in this report shall create a contractual relationship or cause the third party to bring suit against McGinley & Associates, Inc.

7.2 Data Gaps

The following data gaps were encountered during the course of this Phase I ESA:

- Historical aerial photographs were not available prior to the first developed use of the property (agriculture). However, this data gap is not considered significant since it is likely that agricultural use was the first developed use of the property.
- Historical information found for the Subject Property may have exceeded five year intervals. This data gap is not considered significant as the specific use of the property and adjoining properties appears unchanged during the period of time that exceeded five years.
- Some of the ground surface on the Subject Property was covered in snow, vehicles, other materials, or was observed to be wet from precipitation, which limited observations during the site visit. In McGinley's opinion, the ground cover does not represent a significant limitation that would preclude the identification of additional RECs in connection with the Subject Property. Therefore, this data gap is not considered significant.

8. SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, this Phase I ESA has been prepared and reviewed under the guidance of McGinley staff meeting the definition of Environmental Professional (EP) as defined in 312.10 of 40 CFR 312. McGinley EPs have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Resumes of the environmental professionals utilized in performance of this Phase I ESA are attached in Appendix J.

Respectfully Submitted:

McGinley & Associates, Inc.

I hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession, and to the best of my knowledge, comply with all applicable federal, state and local statutes, regulations and ordinances.

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Project Manager / Environmental Scientist

Reviewed by:

Joseph McGinley, P.E., P.G., C.E.M. #1036, Exp. Date 11/23/2022
Principal

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Figures

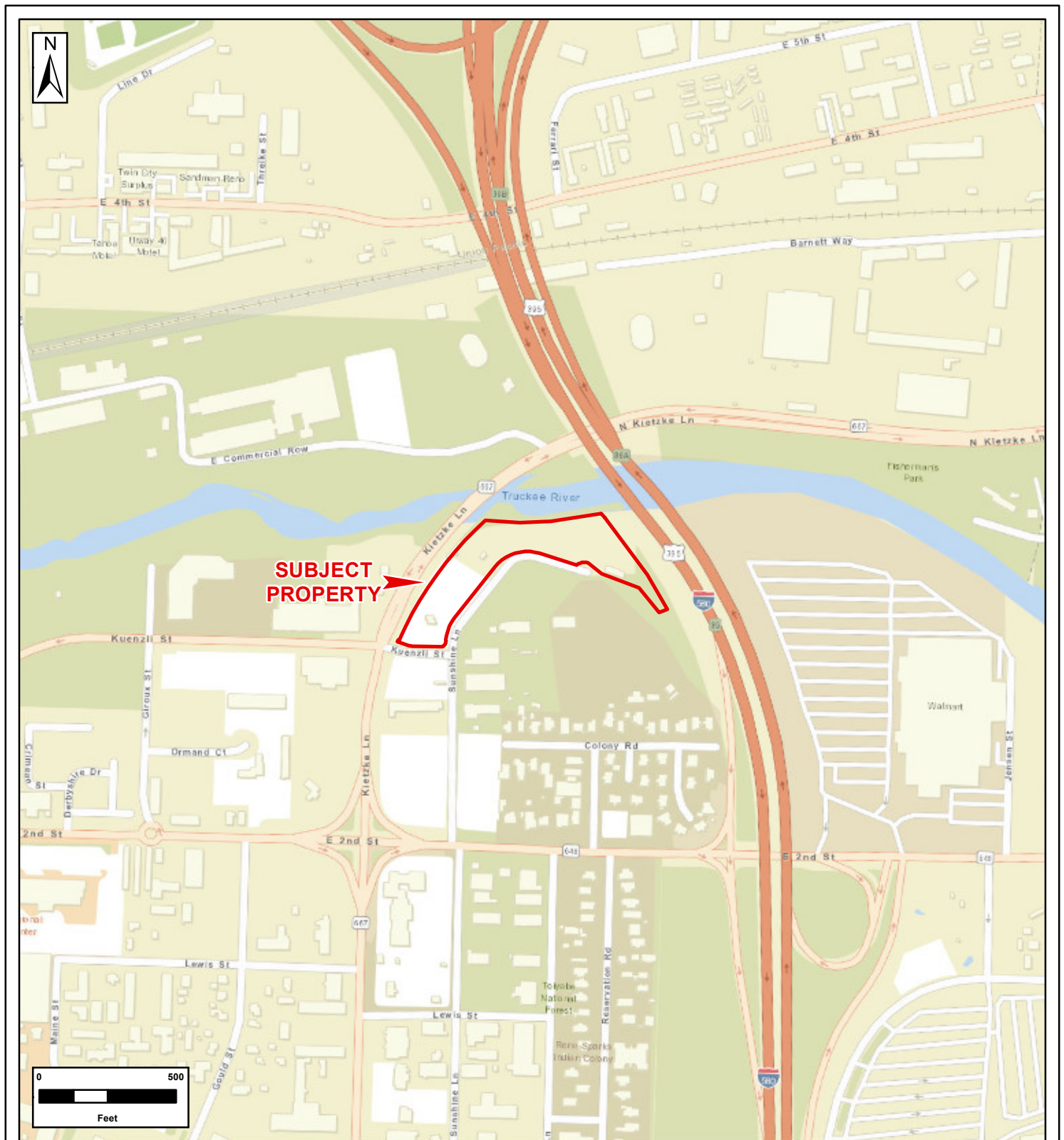


FIGURE 1

TITLE:

**PROJECT LOCATION MAP
-SHOWING-
APN: 012-302-14
RENO, WASHOE COUNTY, NV**

JOB NO.:
BRN067.001

DATE:
11/19/2020



FILE:
Fig 1 - Project Location Map

COORDINATE SYSTEM:
NAD 1983 UTM Zone 11N

REF.	DESIGNED	KW	CHECKED	KW	REVISION:
	DRAWN	HC	APPROVED	KW	

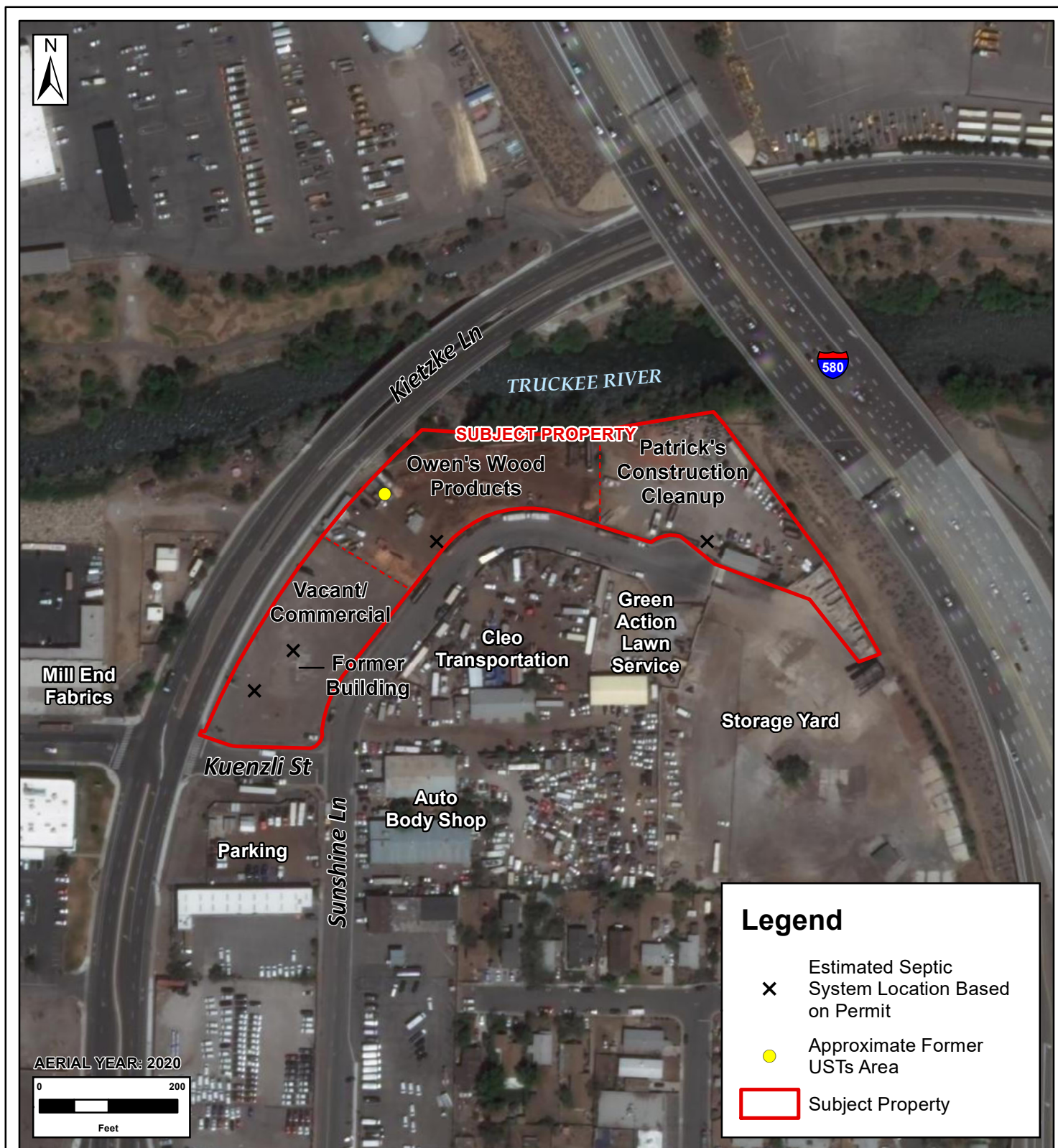


FIGURE 2

TITLE:

**SITE MAP
-SHOWING-
APN: 012-302-14
RENO, WASHOE COUNTY, NV**

JOB NO.:
BRN067.001

DATE:
1/19/2021

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FILE:
Fig 2 - Site Map

COORDINATE SYSTEM:
NAD 1983 UTM Zone 11N

DESIGNED	KW	CHECKED	KW	REVISION:
DRAWN	HC	APPROVED	KW	-