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PHASE I ENVIRONMENTAL SITE ASSESSMENT

**80 and 90 Sunshine Lane and
1975 and 1985 Kuenzli Street
APNs 012-302-15 and 012-302-16
City of Reno, Washoe County
Nevada**



***Prepared for:
Contract No.: DEP17-026
Task No.: MA26-21
McGinley Report No.: BRN067.002***

***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.....	5
1.1	Purpose.....	5
1.2	User Responsibilities.....	5
1.3	Conditions of Contract.....	6
1.4	Scope of Work.....	6
2.	ENVIRONMENTAL SETTING.....	7
2.1	Site Location.....	7
2.2	Regional Physiographic Setting.....	7
2.3	Geologic Conditions.....	7
2.4	Surface Water Conditions.....	7
2.5	Groundwater Conditions.....	7
3.	SITE HISTORY AND HISTORICAL LAND USE.....	8
3.1	Historical Aerial Photographs, Topographic Maps, Sanborn Maps.....	8
3.2	City Directory Listings.....	9
3.3	County Assessor's Office.....	10
3.4	Previous ESA Activities.....	10
4.	RECORDS REVIEW.....	11
4.1	EDR Radius Map Report.....	11
4.2	Nevada Division of Environmental Protection (NDEP).....	12
4.2.1	Division of Environmental Protection.....	12
4.3	Washoe County Health District (WCHD).....	12
4.4	City of Reno Environmental Control Section (ECS).....	13
4.5	Regional PCE Plume.....	13
4.6	EDR Vapor Encroachment Screen.....	14
4.6.1	Tier 1 Screening.....	14
4.6.2	Tier 2 Screening.....	14
5.	SITE RECONNAISSANCE.....	16
5.1	Site Description and Current Usage.....	16
5.2	Methodology.....	16
5.3	Observations During Reconnaissance.....	16
5.3.1	APN 012-302-15.....	17
5.3.2	APN 012-302-16.....	17
5.4	Polychlorinated Biphenyl (PCB) Sources.....	18
5.5	Interview with Current Owner.....	19
5.6	Adjoining Properties.....	20
6.	FINDINGS.....	21

6.1	General Findings.....	21
6.2	Historical Recognized Environmental Conditions.....	22
6.3	Controlled Recognized Environmental Conditions.....	22
6.4	Recognized Environmental Conditions.....	22
6.5	Conclusions.....	23
7.	LIMITATIONS.....	25
7.1	General.....	25
7.2	Data Gaps.....	25
8.	SIGNATURES OF ENVIRONMENTAL PROFESSIONALS.....	26
9.	REFERENCES.....	27

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 80 and 90 Sunshine Lane and 1975 and 1985 Kuenzli Street 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 4.34 acres of land identified with Washoe County as Assessor's Parcel Numbers (APNs) 012-302-15 and 012-302-16. The Subject Property presently includes four service repair garage buildings, a scale house and truck scales, and exterior storage yard areas.*
- The Subject Property appears to have largely consisted of irrigated agricultural land from at least the 1930s through 1960s.*
- The southern portion of the Subject Property was first developed circa 1966 with a storage yard and a portion of the existing service garage building within APN 012-302-15. By the early 1970s, an addition was constructed to extend the eastern portion of the service garage. The current occupant, Streamline Auto Body & Paint, conducts automotive services including body work and painting, repairs, and maintenance. Previous tenants are believed to have included automobile repair, paint and body repair, upholstery repair, and HVAC contractors. At the time of the site reconnaissance, the service garage included a paint booth, parts washers, and in-ground hydraulic lifts. A shower stall within the eastern restroom contained a drum and basin which appeared to potentially be utilized as a parts washer or other hazardous liquid container. Numerous 55-gallon drums and five-gallon containers of petroleum products, coolants, paints, and wash thinner solvents were observed. Staining and pooled liquids were observed, including evidence of automotive fluids leaking from a vehicle and flowing into pavement cracks. Multiple floor drains were observed throughout the building interior. Concrete patches were observed which may indicate former drains or in-ground lifts. Along the eastern exterior of the building, numerous metal drums were observed which reportedly include drums that were salvaged by the previous property owner. The former or current contents of the drums are unknown.*
- During the 1970s, APN 012-302-16 was developed with the existing western and eastern service garage buildings, scale house and truck scales, and the exterior vehicle storage and salvage yards. The existing service garage building within the central portion of APN 012-302-16 was later constructed in 1984.*
- The current occupant of the western service garage within APN 012-302-16 is Streamline Auto Body & Paint. Previous tenants are believed to have included automobile repair, paint and body repair, automobile wrecking, and scrap salvage operations. At the time of the site reconnaissance, the service garage included a paint booth and an aboveground hydraulic lift. Numerous 55-gallon drums and five-gallon containers of automotive fluids were observed. A trench drain was observed which reportedly does not have a discharge point. The exterior yard to the south and east of the building contained numerous vehicles and several 55-gallon drums.*
- The current occupants of the scale house and associated yard areas are Cleo Transportation and Green Action Lawn Service. The historic uses of the property included automobile wrecking, scrap salvage, commercial truck sales, green waste transfer station, trucking businesses, and possibly a concrete block supplier. The*

inoperative heavy-duty truck scales onsite are reportedly equipped with a set of underground hydraulics.

- The current occupant of the central service garage is Reno Auto Body Shop Inc. The current and historic uses of the property have included automobile paint and body shops. At the time of the site reconnaissance, the service garage included both in-ground and aboveground hydraulic lifts, plus indications of several former in-ground hydraulic lifts. Numerous 55-gallon drums and five-gallon containers of automotive fluids were observed. A trench drain was observed which reportedly does not have a discharge point.
- The current occupant of the eastern service garage is ATS Mechanics. The current and historic uses of the property have included automobile repair. Equipment observed within the service garage included a parts washer, a space heater which utilizes used oil, and in-ground and aboveground hydraulic lifts. Multiple 55-gallon drums and five-gallon containers of automotive fluids were observed, plus a bulk used oil container. Staining and absorbent materials were observed on the concrete floor proximal to several containers, especially within the eastern portion of the building. A trench drain was observed which reportedly does not have a discharge point.
- The Subject Property was identified as a record in the following databases searched by EDR: Resource Conservation and Recovery Act (RCRA) Very Small Quantity Generator (VSQG), RCRA Non-Generator/No-Longer-Regulated (NonGen/NLR), Environmental Protection Agency's (EPA) Facility Index Database System (FINDS), Enforcement and Compliance History (ECHO), solid waste recycling database (SWRCY), and California Hazardous Waste Tracking System (HAZNET).
- 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. Ralph's Auto Body/90 Sunshine Lane also operated as a RCRA generator circa 1995 to 2013. According to HAZNET records, Ralph's Auto Body 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. American Salvage/1915 Kuenzli Street, was additionally identified as a recycler of radiators and scrap metal. Other occupants of the Subject Property were not identified in the regulatory agency databases searched by EDR.
- In 1995, the Washoe County Health District (WCHD) received a report from the previous Subject Property owner that a hydraulic lift line had ruptured. In order to repair the broken line, concrete and soils were excavated within a shop. The location was not specified, but is suspected to have been one of the service garage buildings located within the Subject Property. 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 1965, a septic system was installed to the south of the building within APN 012-302-15. Additionally, the Washoe County Assessor indicates that APN 012-302-16 is equipped with septic systems; however, permits were not provided by the WCHD.
- Several complaints have been made to the WCHD for 80 and 90 Sunshine Lane and 1915 Kuenzli Street 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 300 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)

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

Recognized Environmental Conditions (REC)

The following recognized environmental conditions were found for the Subject Property:

- The Subject Property buildings appear to have been equipped with several hydraulic lifts with subsurface components. Additionally, the inoperative truck scales are reportedly equipped with underground hydraulic components. Releases of hazardous substances, including hydraulic fluids and associated cleaning solvents, are known to be associated with the operation and maintenance of in-ground hydraulic lifts. According to the information reviewed, no documentation regarding potential environmental sampling of the lifts is known; however, at least one release is known to have occurred. A such, the potential release of hazardous substances to the subsurface over the lifetime of these lifts cannot be ruled out.*
- 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. 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 APNs 012-302-15 and 012-302-16 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:

- REC: The Subject Property buildings appear to have been equipped with several hydraulic lifts with subsurface components. Additionally, the inoperative truck scales are reportedly equipped with underground hydraulic components. Releases of hazardous substances, including hydraulic fluids and associated cleaning solvents, are known to be associated with the operation and maintenance of in-ground hydraulic lifts. According to the information reviewed, no documentation regarding potential environmental sampling of the lifts is known; however, at least one release is known to have occurred. A such, the potential release of hazardous substances to the subsurface over the lifetime of these lifts cannot be ruled out.*
- 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. 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 80 and 90 Sunshine Lane and 1975 and 1985 Kuenzli Street 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 Numbers (APNs) 012-302-15 and 012-302-16. 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 parcels, 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 is located approximately 150 feet north of the Subject Property. 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 (1939-1962); 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 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 (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 (1984-1999); 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); Subject Property appears generally consistent with present day conditions including existing scale house, four service garage buildings, storage areas, and parked vehicles (2017).
North:	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); existing road (Sunshine Lane) developed, southwestern portion of the parcel appears to include an additional small structure, agricultural fields appear fallow (1966); agricultural uses beyond 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 parking or storage yard, western 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, existing office shed structure developed in the western central portion of the parcel (1994); eastern storage yard appears cleared, exterior areas throughout the entire parcel appear utilized for vehicle parking or storage (1999); buildings formerly along Kietzke Lane and Sunshine Lane in the western portion of the parcel are no longer visible, northern-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 most portion of the parcel have been demolished.
South:	Irrigated agricultural land with apparent rural residences (1939-1962); existing service repair garage/office building and aboveground fuel tank developed (1966-2017).
East:	Irrigated agricultural land with a radio tower (1939-1959); vehicles or other materials storage yard developed (1962-1994); storage yard utilized for landscaping materials (1999-2017).
West:	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); existing road (Sunshine Lane) developed, agricultural uses appear discontinued (1966); one 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).

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 parcels were identified as 80 and 90 Sunshine Lane and 1975 and 1985 Kuenzli Street. 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 1915 Kuenzli Street

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.

- **80 Sunshine Lane:** Reno Scrap and Steel (1976); ABC Block Co (1981); A-Action Towing (1986, 1989), D&S Auto and Truck Dismantlers and Public Scales (1992, 1995), Reno Scrap & Steel Corp. (1995), Nevada Auto Body (2000), Commercial Truck & Auto Body Repair (2005), Streamline Paint & Body (2010, 2014, 2017).

- **90 Sunshine Lane:** All Nite Garage (1971), Pameco Aire refrigeration equipment distributor (1976, 1981, 1986, 1989, 1992, 1995), De Martini's Sunshine Body Shop (1976, 1981), B&E Auto Upholstery (1976), Lee-Dan's Auto Upholstery (1981, 1986, 1989), Ralph's Body Shop (1986, 1989, 1992, 1995, 2000, 2005, 2010), Alfaro Upholstery (1995), Custom Bilt Inc. (2000, 2010, 2014, 2017), M&M Auto Electric (2000, 2010, 2014, 2017), Rony Espinoza (2005), High Country Sales and Leasing (2005).
- **1915 Kuenzli Street:** Northern Nevada Scrap & Salvage (1981), A&A Scrap & Salvage (1986), Reno Truck Stop Scale (1989), D&S Auto and Truck Dismantlers (1989), D&S Towing (1992, 1995), Sunshine Public Scales (2000, 2005).
- **1975 Kuenzli Street:** Reno Auto Body Shop (1986, 1989, 1992, 1995, 2000, 2005, 2014, 2017), Wreck Check of Nevada Inc. (2000, 2014).
- **1985 Kuenzli Street:** Commercial Truck & Auto Repair (1986, 1989, 1992, 1995, 2000, 2005), Bob's Auto & Truck Repair (2010, 2017).

3.3 County Assessor's Office

According to the Washoe County Assessor's Office, the Subject Property is identified as APNs 012-302-15 and 012-302-16. The land use code of APN 012-302-15 is *General Commercial* and the land use code of APN 012-302-16 is *General Industrial - light industry, trucking and warehousing, service, repair*. The zoning code for both parcels is *All - Industrial*. The Subject Property is listed as 4.34 acres in size. APN 012-302-15 is listed as improved with a 8,640 square foot service repair garage building constructed in 1966. APN 012-302-16 is listed as improved with four buildings including: a 3,280 square foot service repair garage building constructed in 1960, a 6,500 square foot service repair garage building constructed in 1972, a 500 square foot shed office structure constructed in 1977, and a 3,984 square foot service repair garage building constructed in 1984. Additional improvements listed include a septic system dated 1960 and 40-ton truck scale dated 1977, plus various fencing and pavement dating back to 1960. It should be noted that based on the Assessor's aerial depiction of the Subject Property boundaries, the eastern portion of APN 012-302-16 appears to be utilized by the adjoining landscaping materials business which operates on the parcel owned by the Reno-Sparks Indian Colony/USA Trustee. 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.

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	X	0.5	0	2	12	NR	NR	15
ECHO	X	0.25	4	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	X	0.5	2	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	Not Listed	0.5	3	15	89	NR	NR	108
CA HAZNET	X	TP	NR	NR	NR	NR	NR	1
SWRCY	X	0.75	1	3	NR	NR	NR	4

The Subject Property was identified as a record in the following databases searched by EDR: Resource Conservation and Recovery Act (RCRA) Very Small Quantity Generator (VSQG), RCRA Non-Generator/No-Longer-Regulated (NonGen/NLR), Environmental Protection Agency's (EPA) Facility Index Database System (FINDS), Enforcement and Compliance History (ECHO), solid waste recycling database (SWRCY), and California Hazardous Waste Tracking System (HAZNET). The information provided by EDR indicates that Reno Auto Body Shop, 1975 Kuenzli Street, has operated as a RCRA generator since at least 1989. The facility is classified as a automotive body, paint, interior repair, and maintenance facility. 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. Ralph's Auto Body, located at 90 Sunshine Lane, operated as a RCRA generator circa 1995 to 2013. According to HAZNET records, Ralph's Auto Body disposed of oxygenated solvents offsite between 1995 and 2004. The Ralph's facility appears to have operated onsite prior to the first RCRA or waste disposal records identified. Additionally, American Salvage, 1915 Kuenzli Street, was identified as a recycler of radiators and scrap metal. Other occupants of the Subject Property were not identified in the regulatory agency databases searched by EDR.

The north-adjoining and crossgradient property was identified as a record in the Nevada Underground Storage Tank (UST) database. Reno Scrap & Steel, located at 41 Sunshine Lane (which is understood to be a historical address corresponding to the north-adjoining parcel) was equipped with two USTs. According to EDR, one 10,000-gallon diesel UST and one 12,000-gallon diesel UST were installed in 1973. Records regarding these USTs were reviewed, see Sections 4.2 and 4.3 of this report.

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 for the north-adjoining property 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 records for the Subject Property and a UST case file for the north-adjoining parcel. Regulatory agency records are included as Appendix F.

In addition to the information obtained from the NDEP Bureau of Corrective Actions, the WCHD maintains records for the north-adjoining UST facility. According to the file reviewed,

two USTs were removed in 1993 and a WCHD representative oversaw the closure process. While visible signs of a release were not observed during the removal, soil confirmation samples identified total petroleum hydrocarbon (TPH) concentrations in two samples at 120 and 290 mg/kg TPH, which 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.

Additionally within the WCHD UST file for the north-adjoining property, 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 two adjoining parcels plus the Subject Property 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. During the current site reconnaissance, several hydraulic lifts with subsurface components were observed, as well as indications of several former lifts such as dismantled equipment and concrete patches, within the buildings of the Subject Property see Section 5.3 of this report.

According to WCHD permit records, multiple septic systems have been installed onsite. In 1965, a septic system was installed to the south of the building within APN 012-302-15, 90 Sunshine Lane. Additionally, the Washoe County Assessor indicates that APN 012-302-16 is equipped with septic systems; however, permit records were not provided by the WCHD.

Several complaints have been made to the WCHD for 80 and 90 Sunshine Lane and 1915 Kuenzli Street 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.

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 ECS records were provided which document that several operators within APN 012-302-16 have been inspected since 2012. It is unclear if inspections were performed onsite prior to 2012. Multiple formal and informal violations have been cited by ECS, including solid waste disposal issues, abandoned vehicles, and records keeping issues regarding receipts/manifests for the removal/pumping of wastes and controlled substances. 80 Sunshine Lane has been identified as including multiple containers of waste oil and waste antifreeze, plus a paint recycler and paint booth. Records for 1985 Kuenzli indicate that multiple 55-gallon drums of waste oil, antifreeze, and parts washer solvent have been located onsite. Additionally, 1985 Kuenzli is equipped with a "dead end" trench drain and shop floor drains which have been allegedly plugged at an unknown time. The trench was reportedly inspected by H2O Environmental and determined to not discharge elsewhere; however, City officials stressed the importance of not allowing waste oil or other fluids to enter and accumulate in the drain. Other similar trench drains and various floor drains were observed in the other onsite buildings.

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 TMWA property beyond Kietzke Lane, approximately 300 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, 92 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.

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 4.34 acres of land and consists of four service repair garage buildings, a scale house building, and exterior storage yard areas. The property is accessed from the west via Sunshine 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. Additionally, several portions of the exterior storage yard area were guarded by dogs and access was not provided. 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	
Sand-oil separators or grease interceptors	
Paint booths, spray rigs, etc.	X
Unorthodox heating and ventilation systems	X
Emergency generators	
Petroleum products, chemical/waste generation and/or storage	X
Unusual odors	
Dumping, disturbed soils, direct burial activity	
Floor drains	X
Air quality control equipment, air emissions, or smoke stacks	
Industrial or manufacturing activities	X
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 APN 012-302-15

At the time of the site reconnaissance, the APN 012-302-15 service garage building was occupied by automotive shops. The current owner indicated Streamline Auto Body & Paint utilizes this building; however, signage and business licenses were observed onsite which indicated the past or current occupant included M&M Electric. The building was comprised of service garage suites with restrooms and storage areas. Operations onsite appeared to include a variety of automotive services including body work and painting, repairs, and maintenance. Automotive parts, tools, and equipment were observed throughout the work areas. Equipment observed within the service garages included an overhead crane, a paint booth, portable oil change pans, compressors, compressed gas tank, parts washers, overhead space heaters, and in-ground hydraulic lifts with subsurface components. Indications of hydraulic fluid staining was observed proximal to the lift within the eastern portion of the building. The restroom in the eastern portion of the building had a sign indicating the restroom was out of service. A shower stall within the restroom contained a drum and basin which appeared to potentially be utilized as a parts washer or other hazardous liquid container. Numerous 55-gallon drums and five-gallon containers of automotive fluids, including petroleum products, coolants, paints, and wash thinner solvents were observed. Staining was observed on the concrete floor proximal to several containers. Additionally, staining and pooled liquids were observed within the vicinity of several vehicles. Liquids appeared to be automotive fluids which were leaking from the vehicles and flowing into pavement cracks and disappearing beneath the slab. Absorbent materials were observed in scattered areas which indicated past releases to the floor. Multiple floor drains were observed throughout the building interior. Several circular concrete patches and large rectangular concrete patches were observed which may indicate former drains, auto body chain anchors, or in-ground lifts which have been removed.

Along the eastern exterior of the building, numerous metal drums were observed to form a wall along the Subject Property boundary. According to the client representative, it is understood that these drums were salvaged by the previous property owner from the South Pacific. The former or current contents of the drums are unknown. The remaining exterior areas included asphalt paved parking areas. *De minimis* staining was observed in the parking lot which appears to be a result of drips from parked vehicles.

5.3.2 APN 012-302-16

At the time of the site reconnaissance, APN 012-302-16 included three service garage buildings and a scale house. The western of the three service garages was occupied by Streamline Auto Body & Paint. The building was comprised of a service garage, an administrative area, restroom, and storage areas. Operations onsite appeared to include a variety of automotive services including body work and painting, repairs, and maintenance. Automotive parts, tools, and equipment were observed throughout the work area. Equipment observed within the service garage included a paint booth, balancing equipment, a propane powered forklift, compressors, portable oil change pans, compressed gas tanks, overhead space heaters, and an aboveground hydraulic lift. Numerous 55-gallon drums and five-gallon containers of automotive fluids, including petroleum products, coolants, paints, and paint thinner solvents were observed. Staining was observed on the concrete floor proximal to several containers. Absorbent materials were observed in scattered areas which indicated past releases to the floor. A trench drain was observed crossing the building interior. According to the tenant, this drain does not have a known discharge point. The majority of the floor within the building was unable to be observed due to vehicles and storage of other items, therefore it is possible that additional floor drains or in-ground lifts may exist onsite. The exterior yard to the south and east of the building is understood to be used for the storage of vehicles owned or being worked on by Streamline. Several concrete pads were observed in the yard area, but as there were vehicles, other items, or snow obstructing observations, it is unknown if these concrete pads were wash areas, former building foundations, or if they served another purpose. Multiple 55-gallon drums were observed along the exterior in unpaved areas. 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.

The central of the three service garages was occupied by Reno Auto Body Inc. The building was comprised of service garages, an administrative area, restroom, and storage areas. Operations onsite appeared to include a variety of automotive services including body work and painting, repairs, and maintenance. Automotive parts, tools, and equipment were observed throughout the work areas. Equipment observed within the service garages included compressors, compressed gas tanks, overhead space heaters, and in-ground and aboveground hydraulic lifts. Additionally, indications of several former in-ground hydraulic lifts, including dismantled equipment and concrete patches were observed. Numerous 55-gallon drums and five-gallon containers of automotive fluids, including diesel fuel, other petroleum products, coolants, paints, and paint thinner solvents were observed. Staining and absorbent materials were observed on the concrete floor proximal to several containers. A trench drain was observed crossing the building interior. According to the tenant, this drain does not have a known discharge point. Additionally, several circular concrete patches and large rectangular concrete patches were observed which may indicate former drains, auto body chain anchors, or in-ground lifts which have been removed. Much of the flooring within the building was unable to be observed due to vehicles and storage of other items, therefore it is possible that additional floor drains or in-ground lifts may exist onsite. The current tenant reported that the building is understood to utilize a septic system. The exterior of the building included paved and unpaved areas.

The eastern of the three service garages was occupied by AT's Automotive. The building was comprised of a service garages, an administrative area, restroom, and storage areas. Operations onsite appeared to include a variety of automotive services including repairs and maintenance. Automotive parts, tools, and equipment were observed throughout the work areas. Equipment observed within the service garage included a parts washer, portable oil change pans, a space heater, and in-ground and aboveground hydraulic lifts. Multiple 55-gallon drums and five-gallon containers of automotive fluids, including petroleum products, coolants, and waste water, plus a bulk waste oil container, were observed. A building heater observed within the western portion of the building is understood to utilize used oil as a fuel source. Staining and absorbent materials were observed on the concrete floor proximal to several containers, especially within the eastern portion of the building. Absorbent materials were observed in scattered areas which indicated past releases to the floor. A trench drain was observed crossing the building interior. According to the tenant, this drain does not have a known discharge point. Much of the flooring within the building was unable to be observed due to vehicles and storage of other items, therefore it is possible that additional floor drains or in-ground lifts may exist onsite. The current tenant reported that the building is understood to utilize a septic system. The exterior of the building included paved and unpaved areas. Due to recent precipitation, it was difficult to identify areas of soil staining versus damp soils; however, a sheen was observed on the surface of pooled water along the southern exterior of the building. Capped piping along the exterior of the building may correspond to a septic clean out.

A truck scale and associated building was observed within the western portion of the parcel. The scale is understood to be out of service but equipped with subsurface hydraulic equipment. The interior of the scale house was not available for inspection at the time of the site reconnaissance. The remaining exterior yards are understood to be used for the storage of vehicles owned or being worked on by Subject Property tenants. Due to vehicle storage and recent precipitation, it was difficult to observe the ground surface and identify areas of soil staining versus damp soils.

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.

APN 012-302-15, 90 Sunshine Lane, has been occupied by Streamline Auto Body & Paint for many years. This company is understood to be an automobile paint and body shop. The historic uses of the property included automobile repair, paint and body repair, upholstery repair, and HVAC contractors. Ms. Guinasso indicated the building may have included hydraulic vehicle lifts, "waste oil drainage systems", and paint booths.

Four addresses were identified by Ms. Guinasso for APN 012-302-16. 80 Sunshine Lane has also been occupied by Streamline Auto Body & Paint for many years. The historic uses of the property included automobile repair, paint and body repair, automobile wrecking, and scrap salvage. Ms. Guinasso indicated the building may have included hydraulic vehicle lifts, "waste oil drainage systems", and paint booths; as well as outdoor heavy equipment such as front-end loaders, car crushers, and cranes.

1915 Kuenzli Street is reportedly occupied by two tenants: Cleo Transportation and Green Action Lawn Service. This company is understood to be trucking company and landscaper. The historic uses of the property included automobile wrecking, scrap salvage, commercial truck sales, green waste transfer station, trucking businesses, and possibly a concrete block supplier. Ms. Guinasso indicated the property may have included the use of outdoor heavy equipment such as front-end loaders, car crushers, and cranes, as well as trucks, vegetation chippers, and landscaping tools. The inoperative heavy-duty truck scales onsite reportedly operated with a set of underground hydraulics.

1975 Kuenzli Street has been occupied by Reno Auto Body Shop Inc. for many years. The current and historic uses of the property is understood to include automobile paint and body shops. Ms. Guinasso indicated the building may have included hydraulic vehicle lifts, "waste oil drainage systems", and paint booths.

1985 Kuenzli Street has been occupied by ATS Mechanics since June 2018 and was previously occupied by Bob's Commercial Truck and Auto Repair for many years. The current and historic uses of the property included automobile repair. Ms. Guinasso indicated the building may have included hydraulic vehicle lifts and "waste oil drainage systems."

Ms. Guinasso stated that the buildings 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 parcels.

5.6 Adjoining Properties

The Subject Property is bordered by the following:

Direction	Description
North:	Kuenzli Street with vacant land, a firewood company, and a solid waste disposal transportation company.
South:	Automotive service garage and taxi company and the Reno Sparks Tribal residences.
East:	A landscaping materials company with Interstate 580/Highway 395 beyond.
West:	Sunshine Lane with a trucking company beyond.

At the time of the site visit, the properties immediately surrounding the Subject Property consisted primarily of commercial and light industrial properties. Reconnaissance of the 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 4.34 acres of land identified with Washoe County as Assessor's Parcel Numbers (APNs) 012-302-15 and 012-302-16. The Subject Property presently includes four service repair garage buildings, a scale house and truck scales, and exterior storage yard areas.
- The Subject Property appears to have largely consisted of irrigated agricultural land from at least the 1930s through 1960s.
- The southern portion of the Subject Property was first developed circa 1966 with a storage yard and a portion of the existing service garage building within APN 012-302-15. By the early 1970s, an addition was constructed to extend the eastern portion of the service garage. The current occupant, Streamline Auto Body & Paint, conducts automotive services including body work and painting, repairs, and maintenance. Previous tenants are believed to have included automobile repair, paint and body repair, upholstery repair, and HVAC contractors. At the time of the site reconnaissance, the service garage included a paint booth, parts washers, and in-ground hydraulic lifts. A shower stall within the eastern restroom contained a drum and basin which appeared to potentially be utilized as a parts washer or other hazardous liquid container. Numerous 55-gallon drums and five-gallon containers of petroleum products, coolants, paints, and wash thinner solvents were observed. Staining and pooled liquids were observed, including evidence of automotive fluids leaking from a vehicle and flowing into pavement cracks. Multiple floor drains were observed throughout the building interior. Concrete patches were observed which may indicate former drains or in-ground lifts. Along the eastern exterior of the building, numerous metal drums were observed which reportedly include drums that were salvaged by the previous property owner. The former or current contents of the drums are unknown.
- During the 1970s, APN 012-302-16 was developed with the existing western and eastern service garage buildings, scale house and truck scales, and the exterior vehicle storage and salvage yards. The existing service garage building within the central portion of APN 012-302-16 was later constructed in 1984.
- The current occupant of the western service garage within APN 012-302-16 is Streamline Auto Body & Paint. Previous tenants are believed to have included automobile repair, paint and body repair, automobile wrecking, and scrap salvage operations. At the time of the site reconnaissance, the service garage included a paint booth and an aboveground hydraulic lift. Numerous 55-gallon drums and five-gallon containers of automotive fluids were observed. A trench drain was observed which reportedly does not have a discharge point. The exterior yard to the south and east of the building contained numerous vehicles and several 55-gallon drums.
- The current occupants of the scale house and associated yard areas are Cleo Transportation and Green Action Lawn Service. The historic uses of the property included automobile wrecking, scrap salvage, commercial truck sales, green waste transfer station, trucking businesses, and possibly a concrete block supplier. The inoperative heavy-duty truck scales onsite are reportedly equipped with a set of underground hydraulics.
- The current occupant of the central service garage is Reno Auto Body Shop Inc. The current and historic uses of the property have included automobile paint and body shops. At the time of the site reconnaissance, the service garage included both in-ground and aboveground hydraulic lifts, plus indications of several former in-ground hydraulic lifts. Numerous 55-gallon drums and five-gallon containers of automotive fluids were observed. A trench drain was observed which reportedly does not have a discharge point.
- The current occupant of the eastern service garage is ATS Mechanics. The current and historic uses of the property have included automobile repair. Equipment observed within the service garage included a parts washer, a space heater which utilizes used oil, and in-ground and aboveground hydraulic lifts. Multiple 55-gallon drums and five-gallon containers of automotive fluids were observed, plus a bulk used oil container. Staining and absorbent materials were observed on the concrete floor proximal to several

containers, especially within the eastern portion of the building. A trench drain was observed which reportedly does not have a discharge point.

- The Subject Property was identified as a record in the following databases searched by EDR: Resource Conservation and Recovery Act (RCRA) Very Small Quantity Generator (VSQG), RCRA Non-Generator/No-Longer-Regulated (NonGen/NLR), Environmental Protection Agency's (EPA) Facility Index Database System (FINDS), Enforcement and Compliance History (ECHO), solid waste recycling database (SWRCY), and California Hazardous Waste Tracking System (HAZNET).
- 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. Ralph's Auto Body/90 Sunshine Lane also operated as a RCRA generator circa 1995 to 2013. According to HAZNET records, Ralph's Auto Body 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. American Salvage/1915 Kuenzli Street, was additionally identified as a recycler of radiators and scrap metal. Other occupants of the Subject Property were not identified in the regulatory agency databases searched by EDR.
- In 1995, the Washoe County Health District (WCHD) received a report from the previous Subject Property owner that a hydraulic lift line had ruptured. In order to repair the broken line, concrete and soils were excavated within a shop. The location was not specified, but is suspected to have been one of the service garage buildings located within the Subject Property. 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 1965, a septic system was installed to the south of the building within APN 012-302-15. Additionally, the Washoe County Assessor indicates that APN 012-302-16 is equipped with septic systems; however, permits were not provided by the WCHD.
- Several complaints have been made to the WCHD for 80 and 90 Sunshine Lane and 1915 Kuenzli Street 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 300 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

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

6.4 Recognized Environmental Conditions

The following *recognized environmental conditions* were found for the Subject Property:

- The Subject Property buildings appear to have been equipped with several hydraulic lifts with subsurface components. Additionally, the inoperative truck scales are reportedly equipped with underground hydraulic components. Releases of hazardous substances,

including hydraulic fluids and associated cleaning solvents, are known to be associated with the operation and maintenance of in-ground hydraulic lifts. According to the information reviewed, no documentation regarding potential environmental sampling of the lifts is known; however, at least one release is known to have occurred. A such, the potential release of hazardous substances to the subsurface over the lifetime of these lifts cannot be ruled out.

- 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. 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 APNs 012-302-15 and 012-302-16 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:

- **REC:** The Subject Property buildings appear to have been equipped with several hydraulic lifts with subsurface components. Additionally, the inoperative truck scales are reportedly equipped with underground hydraulic components. Releases of hazardous substances, including hydraulic fluids and associated cleaning solvents, are known to be associated with the operation and maintenance of in-ground hydraulic lifts. According to the information reviewed, no documentation regarding potential environmental sampling of the lifts is known; however, at least one release is known to have occurred. A such, the potential release of hazardous substances to the subsurface over the lifetime of these lifts cannot be ruled out.
- **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. 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. Additionally, several portions of the exterior storage yard areas were guarded by dogs and access was not provided. 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.

Krista Wahnefried, C.E.M. #2474, Exp. Date 04/01/2021
Project Manager / Environmental Scientist

Reviewed by:

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

9. REFERENCES

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Figures

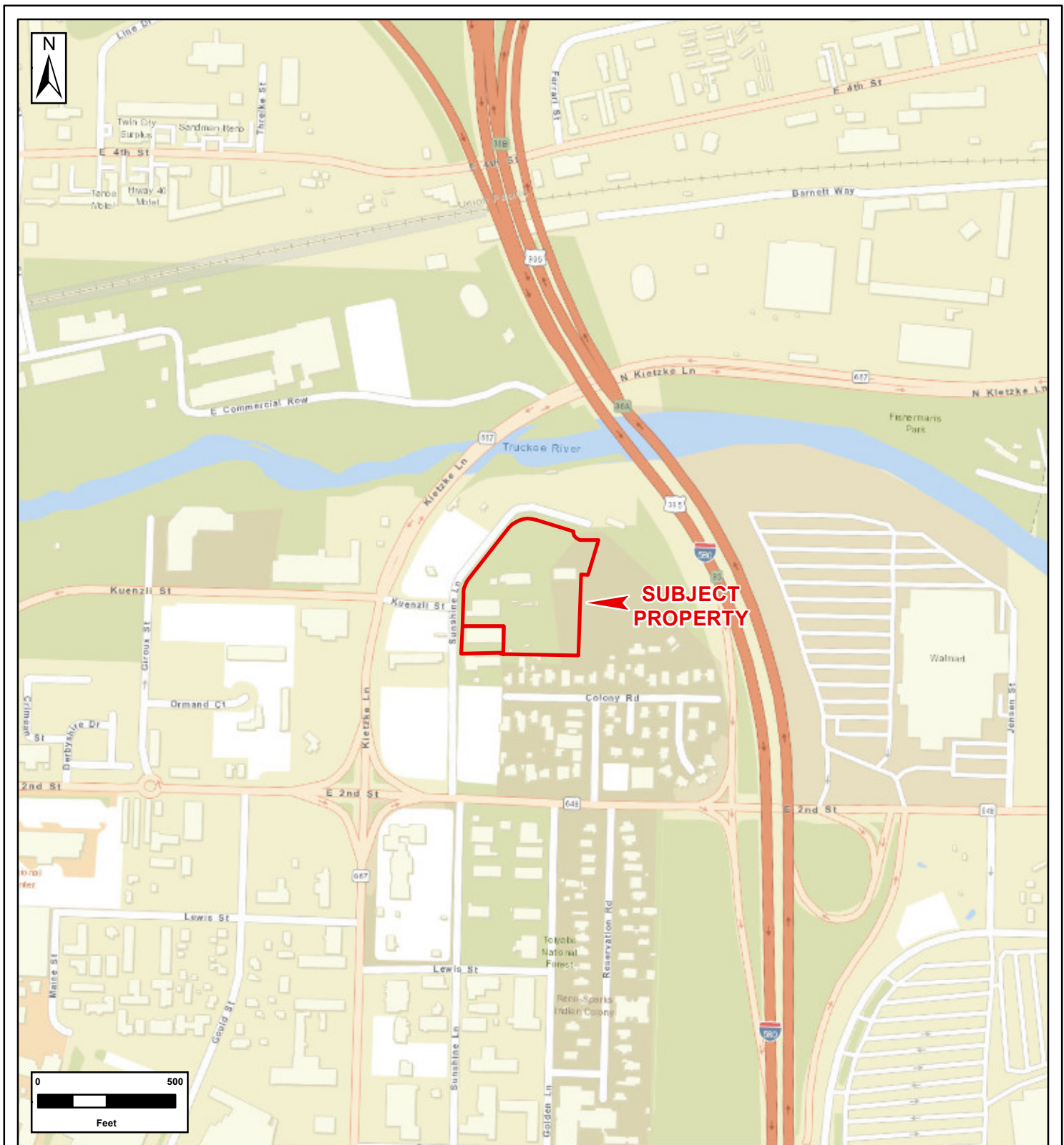


FIGURE 1

TITLE:

**PROJECT LOCATION MAP
-SHOWING-
APN: 012-302-15 AND -16
RENO, WASHOE COUNTY, NV**

JOB NO.:
BRN067.002

DATE:
11/19/2020



FILE:
Fig 1 - Project Location Map

COORDINATE SYSTEM:
NAD 1983 UTM Zone 11N

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



FIGURE 2

TITLE:

**SITE MAP
-SHOWING-
APN: 012-302-15 AND -16
RENO, WASHOE COUNTY, NV**

JOB NO.:
BRN067.002

DATE:
1/19/2021



FILE:
Fig 2 - Site Map

COORDINATE SYSTEM:
NAD 1983 UTM Zone 11N

DESIGNED	KW	CHECKED	KW	REVISION:
DRAWN	HC	APPROVED	KW	-