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PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Nye County Regional Medical Center
(APN 008-261-44)
825 S. Main Street
Tonopah, Nevada**

***Contract DEP14-008
Task Number M16-16***

Prepared for:

***State of Nevada
Department of Conservation & Natural Resources
Division of Environmental Protection
901 South Stewart Street, Suite 4001
Carson City, Nevada 89701***

July 22, 2016

TABLE OF CONTENTS

1.	INTRODUCTION.....	7
1.1	Purpose	7
1.2	Site Location	7
1.3	User Responsibilities	7
1.4	Conditions of Contract	8
1.5	Scope of Work	8
2.	SITE RECONNAISSANCE	9
2.1	Methodology	9
2.2	Observations During Reconnaissance	9
2.3	Site Description and Current Usage.....	11
2.3.1	<i>Main Hospital Building.....</i>	11
2.3.2	<i>Maintenance Building.....</i>	12
2.3.3	<i>Ambulance Building</i>	12
2.3.4	<i>Clinic.....</i>	12
2.3.5	<i>Subject Property Exterior</i>	12
2.4	Adjoining Properties.....	13
2.5	PCB Sources	13
3.	ENVIRONMENTAL SETTING	14
3.1	Regional Physiographic Setting	14
3.2	Geologic Conditions.....	14
3.3	Surface Water Conditions	14
3.4	Groundwater Conditions	14
4.	SITE HISTORY AND HISTORICAL LAND USE	15
4.1	Historical Aerial Photographs.....	15
4.2	Historical Topographic Maps.....	15
4.3	Sanborn Fire Insurance Maps	15
4.4	City Directory Listings	15
4.5	Nye County Assessor's Office.....	16
4.6	Interviews	16
4.6.1	<i>Nye County Building Maintenance.....</i>	16
4.6.2	<i>Past Interviews.....</i>	16
5.	RECORDS REVIEW	17
5.1	EDR Radius Map Report	17
5.2	EDR Vapor Encroachment Screen.....	18
5.2.1	<i>Tier 1 Screening.....</i>	18
5.2.2	<i>Tier 2 Screening.....</i>	18
5.3	Nevada Division of Environmental Protection (NDEP)	18
5.3.1	<i>Nye Regional Medical Center, Facility ID No. 7-000094</i>	19
5.4	EPA Facility Registry Service Database.....	20
6.	FINDINGS	21
6.1	General Findings	21
6.2	Historical Recognized Environmental Conditions	22
6.3	Controlled Recognized Environmental Conditions	23

6.4	Recognized Environmental Conditions.....	23
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	Assessor's Map and Parcel Information
Appendix B	User Questionnaire
Appendix C	Site Photographs
Appendix D	Historical Aerial Photographs and Topographic Maps
Appendix E	Sanborn Map Report and City Directory Listings
Appendix F	EDR Radius Map Report
Appendix G	EDR Vapor Encroachment Screen
Appendix H	Resumes

EXECUTIVE SUMMARY

McGinley and Associates, Inc. (MGA) conducted this Phase I Environmental Site Assessment for the purpose of identifying recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and/or controlled recognized environmental conditions (CRECs) on the 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).

The Subject Property is a hospital complex located at 825 S. Main Street (Highway 95) in the Town of Tonopah, Nye County, Nevada. The Subject Property is comprised of approximately 5.7 acres of land located on one full parcel (APN 008-261-44) and a portion of a second parcel (APN 008-261-45). The Subject Property is located in the W ½ of the NW ¼ of Section 1 and the E ½ of the NE ¼ of Section 2, Township 2 North, Range 42 East, of the Mount Diablo Baseline and Meridian.

The property consists of four buildings, an asphalt-surfaced parking lot, several storage containers, a mobile home/office structure, two banks of solar panels, a propane tank farm, and landscaped areas. The buildings were built in different years and ranged from the 1970s to the 1980s and have been used in the past as the Nye County Regional Medical Center. With the exception of the Clinic Building, which is currently in occupancy by Renown, the buildings are vacated, however, they are being maintained by Nye County maintenance staff. The property is accessed from the north via US Highway 95 (S. Main Street).

Utilities supplied to the Subject Property consist of electric power (NV Energy), sewer and water (Tonopah Public Utilities). Propane is provided to each of the buildings via a propane tank farm located on the property. In addition, solar panels provide most of the electrical power to the facility at this time.

Findings

General Findings

- The Subject Property is comprised of approximately 5.7 acres of land located on one full parcel (APN 008-261-44) and a portion of a second parcel (APN 008-261-45).*
- The Subject Property is developed with four buildings, an asphalt-surfaced parking lot, several storage containers, a mobile home/office structure, two banks of solar panels, a propane tank farm, and landscaped areas. The buildings were built in different years ranging from the 1970s to the 1980s and have been used in the past as the Nye County Regional Medical Center.*
- The main hospital building was constructed in 1971 and is approximately 20,000 square feet in size. It is located on Nye County APN 008-261-44. The main hospital building is comprised of an entrance area, an emergency area, typical hospital patient rooms, surgery rooms, a magnetic resonance imaging facility, x-ray facilities, bathrooms, laboratories, a full-service kitchen and cafeteria, and all of the building systems associated with a health care facility of this size.*
- The maintenance building is located directly south of the main hospital building on Nye County APN 008-261-44. It appears to have been used by the maintenance staff in the past for offices and as a shop. The building was constructed in 1989 and is approximately 1,600 square feet in size. The building is comprised of an office area, a bathroom, and a storage/shop area.*
- The ambulance building is located on Nye County Parcel number 008-261-45. It was constructed in 1996 and is approximately 2,350 square feet in size. The building itself is comprised of an*

office area, a bathroom, and a warehouse area where the ambulances were previously parked. The warehouse floor is surfaced with epoxy-painted concrete and two floor drains were observed in this area.

- The clinic building is located on Nye County APN 008-261-44. It was constructed in 1983 and is approximately 9,000 square feet in size. At the time of the site visit, a portion of the clinic was in use by Renown Hospitals. The building itself is comprised of a patient waiting area, patient rooms, staff offices, bathrooms, a laboratory, and storage areas. Currently, most of the building is not in use by Renown.
- Evidence of asbestos-containing building materials were observed within the main hospital building.
- Two solar-panel electricity generating systems were observed on the southern portions of the Subject Property and are used to generate power for the facility.
- A sewer manhole was observed proximal to the western exterior wall of the ambulance building. A possibility exists that the manhole provides access for a sand interceptor that eventually drains to the sanitary sewer.
- A diesel-powered generator was observed within a locked exterior structure. Evidence of below ground piping previously used to convey fuel to the generator were observed next to the generator within the structure. A diesel odor and evidence of staining on the concrete floor of the structure were also observed.
- An above ground storage tank containing diesel fuel was observed within a concrete secondary containment structure located proximal to the generator building. Above ground piping leading from the tank and into the building was also observed.
- Two unused generators located within containers were observed. It does not appear that the generators have ever been used on the property.
- One storage container and a storage building were observed on the western edge of the Subject Property. Access to these structures were not provided at the time of the site visit. However, the structures were said to contain hospital records.
- A four foot by five foot structure containing a leaking pipe and formerly used for pumping water to the facility was observed on the southern portion of the site. The interior of the building was in disrepair and a continuous leak was observed from a pipe extending out of the concrete floor.
- Five propane tanks were observed on a concrete pad near the southern portion of the site. The propane tanks are used for heating all of the buildings.
- A 500 gallon diesel tank associated with a former incinerator which previously operated on the property, was permanently closed in May of 1995 via filling with sand. At that time, the tank was filled with sand and the openings secured. On February 21, 1997, the Director of Nye County Public Works provided test results for two samples located proximal to the ends of the tank closed in place. The concentrations of TPH in the two samples were reported to be less than the laboratory detection limit of 10 mg/kg. Based on these results, NDEP provided a letter to Nye County stating that "based on the information provided by Nye County (dated February 21, 1997), the Division will not require remediation at this time".
- A 750 gallon diesel tank, which conveyed diesel fuel to a generator, was permanently removed from the ground in 1998.
- A 10,000 gallon heating oil tank was abandoned in place in 1999. On December 16, 1998, an assessment was conducted to determine if petroleum product impacts from a 10,000 gallon tank had occurred to the surrounding soil. Two soil borings were advanced at each end of the tank to

a maximum depth of 20 feet bgs. Samples were collected at 15 feet bgs and submitted to the laboratory for TPH analysis. The samples were both reported to contain 25 mg/kg which was below the State of Nevada action level for TPH (100 mg/kg). Based on those results and due to a 6-inch water line determined to overly the UST, a request for the UST to be abandoned in place was made to the NDEP. On February 3, 1999, the NDEP provided a letter stating that they had received the report and that contamination levels associated with the 10,000 gallon tank are below Nevada Action Levels and require no further action.

Historical Recognized Environmental Conditions (HREC)

No historical recognized environmental conditions were found for the Subject Property except for the following:

- A 500 gallon diesel tank associated with a former incinerator which previously operated on the property, was permanently closed in May of 1995. At that time, the tank was filled with sand and the openings secured. On February 21, 1997, the Director of Nye County Public Works provided test results for two samples located proximal to the ends of the tank closed in place. The concentrations of TPH in the two samples were reported to be less than the laboratory detection limit of 10 mg/kg. Based on these results, NDEP provided a letter to Nye County stating that “based on the information provided by Nye County (dated February 21, 1997), the Division will not require remediation at this time”.
- A 10,000 gallon heating oil tank was abandoned in place in 1999. On December 16, 1998, an assessment was conducted to determine if petroleum product impacts from a 10,000 gallon tank had occurred to the surrounding soil. Two soil borings were advanced at each end of the tank to a maximum depth of 20 feet bgs. Samples were collected at 15 feet bgs and submitted to the laboratory for TPH analysis. The samples were both reported to contain 25 mg/kg which was below the State of Nevada action level for TPH (100 mg/kg). Based on those results and due to a 6-inch water line determined to overly the UST, a request for the UST to be abandoned in place was made to the NDEP. On February 3, 1999, the NDEP provided a letter stating that they had received the report and that contamination levels associated with the 10,000 gallon tank are below Nevada Action Levels and require no further action.

Controlled Recognized Environmental Conditions (CREC)

No controlled recognized environmental conditions were found for the Subject Property except for the following:

- A release of petroleum hydrocarbons was discovered on the Subject Property after the removal of a 750 gallon UST. Samples collected at each end of the tank were reported to have TPH concentrations above laboratory detection limits. The sample collected near the west end of the tank was reported to have a TPH concentration of 176 mg/kg, which was above the State of Nevada action level for TPH of 100 mg/kg. Due to the “remote location of the site and the relatively low concentration of TPH encountered during the UST closure” the consultant conducted an A through K site evaluation and based on the evaluation, requested administrative closure for limited soil impact based on the conditions outlined in NAC 459.9973, Sections 1(a) through 1(k). After concurrence by NDEP, a letter stating that no further action was required at that time was provided to Nye Regional Medical Center in February of 1999.

Recognized Environmental Conditions (REC)

No recognized environmental conditions were found for the Subject Property except for the following:

- At the time of the site visit, two pipes located proximal to the generator were observed protruding from the concrete floor within the generator structure. The pipes may have been diesel feed pipes for the generator. In addition, vent piping was observed on the exterior wall of the generator.

structure. It is unknown if the piping (both feed and vent) are associated with one of the tanks previously closed at the site.

Conclusions

MGA has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527 of the hospital property addressed at 825 Main Street in the Town of Tonopah, 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 controlled recognized environmental conditions or recognized environmental conditions in connection with the Subject Property, except for the following:

- A release of petroleum hydrocarbons was discovered on the Subject Property after the removal of a 750 gallon UST. Samples collected at each end of the tank were reported to have TPH concentrations above laboratory detection limits. The sample collected near the west end of the tank was reported to have a TPH concentration of 176 mg/kg, which was above the State of Nevada action level for TPH of 100 mg/kg. Due to the “remote location of the site and the relatively low concentration of TPH encountered during the UST closure” the consultant conducted an A through K site evaluation and based on the evaluation, requested administrative closure for limited soil impact based on the conditions outlined in NAC 459.9973, Sections 1(a) through 1(k). After concurrence by NDEP, a letter stating that no further action was required at that time was provided to Nye Regional Medical Center in February of 1999.*
- At the time of the site visit, two pipes located proximal to the generator were observed protruding from the concrete floor within the generator structure. The pipes may have been diesel feed pipes for the generator. In addition, vent piping was observed on the exterior wall of the generator structure. It is unknown if the piping (both feed and vent) are associated with one of the tanks previously closed at the site.*

Based on the information reviewed for this assessment, MGA is of the opinion that additional investigations at the Subject Property, including an asbestos assessment, are warranted at this time.

1. INTRODUCTION

1.1 Purpose

This report presents the findings of a Phase I Environmental Site Assessment (ESA) performed on the property addressed at 825 South Main Street in Tonopah, Nye County, Nevada, and hereafter referred to as the Subject Property. McGinley and Associates, Inc. (MGA) 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 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).

1.2 Site Location

The Subject Property is a hospital complex located in the Town of Tonopah, Nye County, Nevada and exists on two parcels of land (APN 008-261-44 and 008-261-45). The Subject Property is located in the W ½ of the NW ¼ of Section 1 and the E ½ of the NE ¼ of Section 2, Township 2 North, Range 42 East, of the Mount Diablo Baseline and Meridian. A parcel map from the Nye County Assessor's Office, which depicts the Subject Property parcels, is provided herein as Appendix A. The location of the site and the property boundary is displayed in Figures 1 and 2.

1.3 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:

1. Environmental cleanup liens that are filed or recorded against the site (40 CFR 312.25);
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);
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);
4. Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29);
5. Commonly known or reasonably ascertainable information about the property (40 CFR 312.30); and
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 B.

1.4 Conditions of Contract

MGA performed this work for the Nevada Division of Environmental Protection (NDEP) on behalf of Nye County as part of the State of Nevada Brownfields program pursuant to our Scope of Work approval dated June 8, 2016 and in accordance with Contract DEP14-008, Task Number M16-16.

1.5 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 an MGA 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 site, 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. SITE RECONNAISSANCE

2.1 Methodology

For the purpose of assessing current site conditions, a visit to the Subject Property and surrounding area was conducted on June 21, 2016 under sunny and warm conditions. During the site visit, observations were made in regards to *recognized environmental conditions (RECs)*. As defined by ASTM E 1527-13, a REC is the presence, or likely presence, of any hazardous substances or petroleum products in, on, or at the 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. Photographs taken during the site reconnaissance are provided in Appendix C.

2.2 Observations During Reconnaissance

The entire site was 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 inspection. If the item was not observed, it will be noted as “Not Observed”. If the item was observed during the site visit, it will be noted as “**Observed**” and a short description of the finding will follow.

- Staining or discoloration of soil and/or pavement
De minimis staining was observed in the parking lot area. The staining appears to be the result of drips from parked vehicles. **Observed**
- Wastewater systems, septic systems, sumps, and/or seeps **Not Observed**
- Wells
Currently no wells are used by the property as water is supplied by a municipal source. However, a small out-building was observed and appeared to be either a well house or a booster pump house. **Observed**
- Patched areas of asphalt or concrete
Asphalt and concrete patches were observed at the rear portion of the main hospital building. The patches appear to be associated with utilities. **Observed**
- Standing surface water, ponds, farm tanks, etc. **Not Observed**
- Railroad spurs **Not Observed**
- Suspect PCB containing equipment
Several pole-mounted and pad-mounted electrical transformers or capacitors were observed on the Subject Property. The transformers appeared to be in good condition and no leaks or stains were observed. It is unknown if the equipment contains PCBs in the cooling fluid. **Observed**

- Hydraulic equipment Not Observed
- Underground storage tank (UST) systems/Vent Pipes
A vent pipe was observed proximal to a generator building. In addition, two disconnected pipes protruding from the concrete pad below the generator equipment were also observed within the building. Currently, diesel fuel is provided to the generator via an aboveground storage tank located adjacent to the building. It is unknown if the piping (feed and vent) were associated with a previously closed UST. Observed
- Above ground storage tanks (ASTs)
A single-wall steel aboveground storage tank was observed adjacent to the generator structure. The storage tank contains diesel fuel for the generator and is surrounded by a concrete secondary containment structure. Aboveground piping leading from the tank was observed entering the building and were also observed to be connected to the generator. Observed
- Sand-oil separators or grease interceptors
Floor drains within the ambulance building indicate the potential presence of a sand-oil separator. Evidence of the separator, in the form of a single manhole cover, was observed adjacent to the ambulance building. Observed
- Paint booths, spray rigs, etc. Not Observed
- Unorthodox heating and ventilation systems Not Observed
- Emergency generators
One working and two non-working generators were observed on the Subject Property. The working generator is supplied diesel fuel via the aboveground storage tank located adjacent to the building. The non-working generators were not connected to a fuel supply and the equipment did not appear to have been used in the past. Observed
- Chemical/waste generation and/or storage
Evidence suggesting past medical waste generation and storage was observed throughout the main hospital building. In addition, anecdotal evidence indicates that an incinerator was operated on the site in the past. Observed
- Unusual odors Not Observed
- Dumping, disturbed soils, direct burial activity Not Observed

- Floor drains
Multiple floor drains were observed throughout the property, mainly in restrooms and cleaning closets. Two in-ground drains were observed in the ambulance building within the parking bay. It is unknown if the drains lead directly to the sanitary sewer system or to a sand-oil separator prior to entering the sanitary sewer system. **Observed**
- Air emissions
Several stacks were observed on the roof of the main hospital building. The stacks appear to be associated with boiler equipment for heating the building through the use of propane. **Observed**
- Industrial or manufacturing activities **Not Observed**
- Distressed, discolored or stained vegetation **Not Observed**
- Oil or gas well exploration or refinery activities **Not Observed**
- Surface water contamination **Not Observed**
- Farm waste, feed lot spoils, or manure stockpile **Not Observed**
- Prolonged use, misapplication or storage of pesticides **Not Observed**
- Discharges, or run-off of potential contaminants from off-site sources **Not Observed**
- Basements and/or subsurface vaults **Not Observed**

2.3 Site Description and Current Usage

The Subject Property is comprised of approximately 5.7 acres of land located on one full parcel (APN 008-261-44) and a portion of a second parcel (APN 008-261-45). The property is a hospital complex consisting of four buildings, an asphalt-surfaced parking lot, several storage containers, a mobile home/office structure, two banks of solar panels, a propane tank farm, and landscaped areas. The buildings were built in different years and ranged from the 1970s to the 1980s and have been used in the past as the Nye County Regional Medical Center. The property is accessed from the north via US Highway 95 (S. Main Street). Utilities supplied to the Subject Property consist of electric power (NV Energy), sewer and water (Tonopah Public Utilities). Propane to each of the buildings is provided via a propane tank farm located on the property. In addition, solar panels provide most of the electrical power to the facility at this time.

2.3.1 Main Hospital Building

According to assessors records, the main building was constructed in 1971 and is approximately 20,000 square feet in size. It is located on Nye County APN 008-261-44. The main hospital building is comprised of an entrance area, an emergency area, typical hospital patient rooms, surgery rooms, a magnetic resonance imaging facility, x-ray facilities,

bathrooms, laboratories, a full-service kitchen and cafeteria, and all of the building systems associated with a health care facility of this size. In general, the building appeared to be run-down and evidence of possible asbestos containing building materials were observed throughout the building.

Building systems observed at the time of the site visit included a boiler system, an air conditioning system, cold and hot water radiators, one in-service generator, two unused generators, and an above ground diesel fuel tank for the diesel-powered generator.

2.3.2 Maintenance Building

The maintenance building is located directly south of the main hospital building on Nye County APN 008-261-44. It appears to have been used by the maintenance staff in the past for their offices and as a shop. The building was constructed in 1989 and is approximately 1,600 square feet in size. The building is comprised of an office area, a bathroom, and a storage/shop area. It does not appear that the building has been recently used.

2.3.3 Ambulance Building

The ambulance building is located on Nye County Parcel number 008-261-45. It was constructed in 1996 and is approximately 2,350 square feet in size. The building itself is comprised of an office area, a bathroom, and a warehouse area where the ambulances were previously parked. The warehouse floor is surfaced with epoxy-painted concrete and two floor drains were observed in this area. It is unknown where the drains direct flow. However, a manhole exists just outside of the warehouse area and according to the current facility groundskeeper, water within the manhole appeared to be clear in nature. The manhole was not opened at the time of the site visit. A possibility exists that the manhole provides access for a sand interceptor that eventually drains to the sanitary sewer.

2.3.4 Clinic

The clinic building is located on Nye County APN 008-261-44. It was constructed in 1983 and is approximately 9,000 square feet in size. At the time of the site visit, a portion of the clinic was in use by Renown Hospitals. The building itself is comprised of a patient waiting area, patient rooms, staff offices, bathrooms, a laboratory, and storage areas. Currently, most of the building is not in use by Renown.

2.3.5 Subject Property Exterior

The exterior portions of the Subject Property mainly consisted of asphalt-surfaced parking areas and travel ways; landscaped planters located proximal to the structures; and undeveloped land comprised of desert grasses and shrubs. The following items were observed on the exterior portions of the property:

- Two solar-panel electricity generating systems were observed on the southern portions of the Subject Property and are used to generate power for the facility.
- A sewer manhole was observed proximal to the western exterior wall of the ambulance building. A possibility exists that the manhole provides access for a sand interceptor that eventually drains to the sanitary sewer.
- A diesel-powered generator was observed within a locked exterior structure. Evidence of below ground piping previously used to convey fuel to the generator were observed within the structure next to the generator. A diesel odor and evidence of staining on the concrete floor of the structure were also observed.

- A 150 gallon above ground storage tank containing diesel fuel was observed within a concrete secondary containment structure located proximal to the generator building. Above ground piping leading from the tank and into the building was also observed.
- Two unused generators located within containers were observed. It does not appear that the generators have ever been used on the property.
- One storage container and a storage building were observed on the western edge of the Subject Property. Access to these structures were not provided at the time of the site visit. However, the structures were reported to contain hospital records.
- A four foot by five foot structure containing a leaking pipe and formerly used for pumping water to the facility was observed on the southern portion of the site. The building may be a health hazard due to the leaking water and filthy conditions observed within its interior.
- Five propane tanks were observed on a concrete pad near the southern portion of the site. The propane tanks are used for heating all of the buildings.

2.4 Adjoining Properties

The Subject Property is bordered by the following:

North:	Highway 95 (Main St.) with a commercial auto repair shop beyond.
South:	A senior center and undeveloped property.
East:	Undeveloped property with Highway 95 (Main St.) beyond.
West:	Nevada Department of Transportation maintenance yard and field offices.

At the time of the site visit, the properties immediately surrounding the Subject Property consisted primarily of undeveloped, commercial, and State-owned maintenance properties. Reconnaissance of the publicly accessible portions of the properties located immediately adjoining the Subject Property to the north, south, and east, revealed no visible evidence of environmental concerns that could potentially impact the Subject Property. The NDOT maintenance yard located to the west was observed to have multiple above ground storage tanks and equipment storage.

2.5 PCB Sources

Polychlorinated biphenyl (PCB) is a man-made chemical 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. Records indicate that portions of the Subject Property were constructed prior to 1979. Therefore, it is possible that PCB-containing equipment exists at the site.

Several pad-mounted electrical transformers and pole-mounted transformers were observed on the Subject Property. One pad-mounted transformer located near the southern edge of the site appeared to be older in nature and rusted. However, no staining was observed. The remaining transformers appeared to be in good condition with no observed leaks. 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.

3. ENVIRONMENTAL SETTING

3.1 Regional Physiographic Setting

The Subject Property is located within the Basin and Range Physiographic Province at an elevation of approximately 6,147 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 Tonopah, Nevada, are 40.4 and 61.9 degrees Fahrenheit, respectively, while historical annual precipitation averages 4.81 inches (Western Regional Climate Center, 2016).

3.2 Geologic Conditions

The geology underlying the Subject Property has been mapped as Tertiary-age *Sedimentary Strata and Interbedded Tuffs*, as well as *Fraction Tuffs*. The Sedimentary Strata and Interbedded Tuffs deposits are described as chiefly volcanogenic sedimentary rocks of lacustrine and fluvia-tile origin intercalated with rhyolitic air-fall tuffs. Local algal reefs, marly and coquinoid limestone, and diatomite beds are also present. The Fraction Tuff deposits are described as lithic-rich rhyolitic to quartz latitic ash-flow tuffs (Kleinhampl & Ziony 1985).

The surficial soils found at the Subject Property have been primarily mapped as the Pintwater-Rock outcrop complex with 15 to 50 percent slopes. The unit is classified as hydrologic soil group D, which is characterized by high runoff potential when thoroughly wet, as water is restricted or very restricted to transmittance through the soil (NRCS, 2014).

3.3 Surface Water Conditions

There are no surface water bodies such as streams, ponds, or wetlands located on the subject property. Further, no major surface water body exists in the vicinity of Tonopah, Nevada. Run-off from occasional isolated precipitation events causes the majority of precipitation to flow towards a storm drainage culvert located along the northern border of the Subject Property. The culvert directs stormwater flows towards downtown Tonopah to the northwest.

According to the Federal Emergency Management Agency (FEMA), the site 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.

3.4 Groundwater Conditions

Based on a review of the Nevada Division of Water Resources (NDWR) Well Log Database, water wells may be located in the vicinity of the Subject Property, but their exact locations are unknown and their existence has not been field-verified. No wells were observed or reported to be located on the Subject Property during site reconnaissance. Groundwater flow direction at the Subject Property is estimated to be primarily towards the north-northwest. MGA estimates that the groundwater depth is estimated to be greater than 100 feet below ground surface.

4. SITE HISTORY AND HISTORICAL LAND USE

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

4.1 Historical Aerial Photographs

Environmental Data Resources, Inc. (EDR) provided aerial photographs covering the area of the Subject Property for the years: 1974, 1976, 1980, 1984, 1994, 1999, 2006 and 2010. Aerial photographs for years other than these were not reviewed. The photos associated with the years 1974, 1976, and 1980 were too blurry to provide any credible information. The first occurrence of development in the vicinity of the Subject Property appears in the 1974 aerial photo. Although blurry, the NDOT facility to the west and an oval track facility to the south can be made out. Structures on the Subject Property can be clearly seen in the 1984 photo and the main hospital building observed at the time of the site visit appears similar in shape as the structure observed in the 1984 photo. The review of these aerial photographs did not reveal any potential environmental issues that may have impacted the Subject Property in the past. A copy of the historical aerial photograph report that was reviewed is provided in Appendix D.

4.2 Historical Topographic Maps

Historical topographic maps were provided by EDR covering the area of the Subject Property for the years: 1960, 1961, 1974, 1982, and 2014. Topographic maps for years other than these were not reviewed. A hospital appears on the Subject Property in all of the topo maps reviewed. The review of these maps did not reveal any potential environmental issues that may have impacted the Subject Property in the past. A copy of the historical topographic map report that was reviewed is provided in Appendix D.

4.3 Sanborn Fire Insurance Maps

A Sanborn Map Report for the Subject Property was provided by EDR. However, Sanborn fire insurance maps, which can often provide detailed historical information about a site, have not been published for the area of the Subject Property. A copy of the EDR Sanborn Map Report that was reviewed is provided in Appendix E.

4.4 City Directory Listings

At the request of MGA, EDR searched City Directory listings for South Main Street and Erie Main Street. City directory listings as published by Cole Information Services City Directory listings were searched for the years: 1992, 1995, 1999, 2003, 2008, and 2013. According to the City Directories, the Subject Property appears to have two addresses associated with the Subject Property, 825 S. Main Street and 825 Erie Street. A summary of findings from the available city directory listings for the Subject Property and surrounding properties is provided in the table below. A copy of the EDR city directory report that was reviewed is provided in Appendix E.

YEAR	DESCRIPTION			
	Subject Property		Adjoining Properties	
	825 S. Main St.	825 Erie St.	805 S. Main St.	826 Erie St.
1992	Mental Health Center , Nevada Health Inspection, and Tonopah Mental Health center	Residential and Hospital Nye General	Nevada Transportation	Not Listed
1995	Residential and Health Inspector	Not Listed	Not Listed	Not Listed
1999	Nye Regional Medical Center, Southwest Vision Services of Ronald Dutton, and Beraldo Vasquez MD, and Nevada State Government offices Health Services	Not Listed	Nevada State Government Offices Transportation	Not Listed
2003	Residential	Residential	Not Listed	Not Listed
2008	Residential	Not Listed	Not Listed	Not Listed
2013	Residential	Nye Regional Medical Center	State of Nevada Department of Transportation	Economy Inn

4.5 Nye County Assessor's Office

According to the Nye County Assessor's Office, the Subject Property is listed as APN 008-261-44 and a portion of 008-261-45. The land use code of the Subject Property is listed as *General Commercial*. The build date of the on-site building is listed as 1987 and the building square footage is listed as 29,158 square feet. The current property owner is listed as Nye County State of Nevada, which has owned the property since 2015. Previous property owners listed include Tuna Park LTD (2006 to 2015). Ownership information prior to 2006 was not provided in the information available for review.

4.6 Interviews

4.6.1 Nye County Building Maintenance

At the time of the site visit, Mr. Sheldon, from Nye County Building Maintenance, provided a tour of the facility. Mr. Sheldon indicated that he had been at the Subject Property for approximately six months and was in charge of making sure the facility was maintained while the hospital was closed for business. His knowledge was limited to the current status of the building systems and some of the history of the structures.

During the site visit, several areas within the hospital building were visited that appeared to have thermal system insulation (TSI) piping above the ceiling tiles. Mr. Sheldon also provided access to the heating and air conditioning systems which he was worried still used asbestos-containing building materials. The areas of his concern appeared to be friable in nature. Other than the possible asbestos-containing materials, Mr. Sheldon was not aware of any other environmental concerns at the Subject Property.

4.6.2 Past Interviews

During an interview previously conducted for a Phase I ESA on the adjacent property to the south, MGA staff spoke with Mr. Jerry Seelig, the former Nye County Regional Medical Center President. For that interview, Mr. Seelig was asked questions regarding the adjacent property and his knowledge of possible environmental issues, chemical spills, or releases on that property. He was not aware of any. Mr. Seelig also indicated that the Nye County hospital had previously operated an incinerator on the hospital property.

5. RECORDS REVIEW

As defined in ASTM E 1527-13, a *historical recognized environmental condition* 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 *controlled recognized environmental condition* 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.).

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.

5.1 EDR Radius Map Report

At the request of MGA, 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 F. 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. MGA reviewed and evaluated all of the sites in the EDR report.

The Subject Property was identified as a record in the following databases searched by EDR: One Nevada State Hazardous Waste Site (SHWS), one Underground Storage Tank (NV UST), two Environmental Protection Agency's Facility Index Database Systems, two Enforcement and Compliance History Online, three Recovered Government Archive State Hazardous Waste Facilities, and two Recovered Government Archive Leaking Underground Storage Tank sites.

In addition, the following regulatory listings were identified within the *Approximate Minimum Search Distances* in the databases searched by EDR: one Superfund Enterprise Management System (SEMS) site, one Resource Conservation and Recovery Act (RCRA) Small Quantity Generator (SQG) site, seven Nevada State Hazardous Waste sites (SHWS), two Nevada Underground Storage Tank (UST) sites, three US Brownfields sites, one formerly used defense site (FUDS), and one EDR proprietary Manufactured Gas Plant.

In order to evaluate potential impacts to the Subject Property, a review of pertinent regulatory agency files was conducted on one of the above listed sites, which is associated with the Subject Property. Additional information obtained for this site is provided in Section 5.3 of this report.

The remaining sites identified in the EDR Radius Map Report were not researched further because they are considered unlikely to have caused environmental impacts to the Subject Property in the past, because they appear to be located far from the Subject Property, are at locations that are considered likely to be hydrologically downgradient from, or cross-gradient

to, the Subject Property, have had no reported releases, have had no reported violations of hazardous waste regulations, and/or have received regulatory closure.

The EDR database search also identified a number of sites that could not be mapped due to insufficient address information. MGA reviewed all of these sites and has determined that each are located far from the Subject Property, are at locations that are considered likely to be hydrologically downgradient from, or cross-gradient 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.

5.2 EDR Vapor Encroachment Screen

MGA 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 is 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. MGA performed a VES 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.

5.2.1 Tier 1 Screening

Initially, 14 sites were identified within the 1/3 mile primary search radius surrounding the Subject Property. MGA reviewed each of the 14 sites to evaluate their potential to create a vapor encroachment condition. Of the initial 14 sites, 12 sites had limited potential for the presence of contaminants of concern; were determined to be outside the area of concern based on distance, gradient, and the type of COC; and/or were determined to be beyond the critical distance for vapor migration to the Subject Property. For the remaining site, a Tier 2 Screening was performed.

5.2.2 Tier 2 Screening

According to NDEP files available for review regarding USTs previously used at the Subject Property, all three tanks were closed permanently in the 1990s. An assessment conducted at the time of closure of the 750 gallon diesel tank determined that levels of TPH above Nevada Action Levels were reported in one of the assessment samples. However, due to the remote nature of Tonopah and the lower levels of TPH found, a risk based A-K closure was granted. Therefore, the contamination (150 mg/kg diesel) was left in place above regulatory action levels. However, based on the concentrations of diesel in the soil and the nature of diesel having a low volatility and a low potential for vapors to migrate, vapor migration from this site is not a concern at this time and a VEC is not likely to exist. A copy of the VES report is included herein as Appendix G.

5.3 Nevada Division of Environmental Protection (NDEP)

The regulatory agency review identified the Subject Property as a regulatory site administered by the NDEP. Therefore, those agency files were requested for review from the NDEP.

5.3.1 Nye Regional Medical Center, Facility ID No. 7-000094

Based on the information available for review from the NDEP, the Nye County Regional Medical Center has had three USTs previously registered with the State of Nevada. According to the NDEP UST Database available online, the tanks associated with Facility ID No. 7-000094 included a 10,000 gallon heating oil tank, a 750 gallon diesel tank, and a 500 gallon diesel tank. The tanks were installed in 1968, 1968, and 1971 respectively and were all constructed of bare steel or asphalt coated.

In September of 1993, the 500 gallon diesel tank was placed in temporary closure and in May of 1995, the tank was filled with sand and the openings secured. The tank appears to have been associated with an incinerator that was operated on site for the facility. At that time, an assessment was not conducted which is required if a tank is to be permanently closed. After requesting an assessment be conducted on three separate occasions, the NDEP provided a letter to the Director of the Nye County Department of Public Works which required that the assessment be completed and its results reported to NDEP no later than February 28, 1997. On February 21, 1997, the Director of Nye County Public Works provided test results for two samples located proximal to the ends of the tank closed in place. The concentrations of TPH in the two samples were reported to be less than the laboratory detection limit of 10 mg/kg. Based on these results, NDEP provided a letter to Nye County stating that “based on the information provided by Nye County (dated February 21, 1997), the Division will not require remediation at this time”.

On November 25, 1998, the 750 gallon diesel tank was closed by removal. At that time, a closure assessment was conducted and samples of native soils were collected from the excavation side wall near each end of the UST. Each sample was collected at a depth of approximately 12 feet below ground surface (bgs). The two samples were analyzed for TPH. Both samples had a reported TPH concentration above laboratory detection limits. The sample collected near the west end of the tank was reported to have a TPH concentration of 176 mg/kg, which was above the State of Nevada action level for TPH (100 mg/kg). Due to the “remote location of the site and the relatively low concentration of TPH encountered during the UST closure” the consultant conducted an A through K site evaluation. Based on the evaluation, they requested administrative closure for limited soil impact based on the conditions outlined in NAC 459.9973, Sections 1(a) through 1(k). The NDEP concurred with that request and a letter stating that no further action was required at that time was provided to Nye Regional Medical Center in February of 1999.

On December 16, 1998, an assessment was conducted to determine if petroleum product impacts from a 10,000 gallon tank had occurred to the surrounding soil. Two soil borings were advanced at each end of the tank to a maximum depth of 20 feet bgs. Samples were collected at 15 feet bgs and submitted to the laboratory for TPH analysis. The samples were both reported to contain 25 mg/kg of TPH in the oil range, which was below the State of Nevada action level for TPH (100 mg/kg). Based on these results and due to a 6-inch water line overlying the UST, a request for the UST to be abandoned in place was made to the NDEP. On February 3, 1999, the NDEP provided a letter stating that they had received the report and that contamination levels associated with the 10,000 gallon tank are below Nevada Action Levels and require no further action.

5.4 EPA Facility Registry Service Database

The regulatory agency review identified the Subject Property as a Criteria Air Pollutant Major facility. Records associated with the facility appear to indicate that an air permit for its incinerator was issued in the State of Nevada while it was in use. Potential pollutants included ozone, lead, particulate matter, and sulfur dioxide. The incinerator no longer exists at the facility.

6. FINDINGS

6.1 General Findings

- The Subject Property is comprised of approximately 5.7 acres of land located on one full parcel (APN 008-261-44) and a portion of a second parcel (APN 008-261-45).
- The Subject Property is developed with four buildings, an asphalt-surfaced parking lot, several storage containers, a mobile home/office structure, two banks of solar panels, a propane tank farm, and landscaped areas. The buildings were built in different years ranging from the 1970s to the 1980s and have been used in the past as the Nye County Regional Medical Center.
- The main hospital building was constructed in 1971 and is approximately 20,000 square feet in size. It is located on Nye County APN 008-261-44. The main hospital building is comprised of an entrance area, an emergency area, typical hospital patient rooms, surgery rooms, a magnetic resonance imaging facility, x-ray facilities, bathrooms, laboratories, a full-service kitchen and cafeteria, and all of the building systems associated with a health care facility of this size.
- The maintenance building is located directly south of the main hospital building on Nye County APN 008-261-44. It appears to have been used by the maintenance staff in the past for offices and as a shop. The building was constructed in 1989 and is approximately 1,600 square feet in size. The building is comprised of an office area, a bathroom, and a storage/shop area.
- The ambulance building is located on Nye County Parcel number 008-261-45. It was constructed in 1996 and is approximately 2,350 square feet in size. The building itself is comprised of an office area, a bathroom, and a warehouse area where the ambulances were previously parked. The warehouse floor is surfaced with epoxy-painted concrete and two floor drains were observed in this area.
- The clinic building is located on Nye County APN 008-261-44. It was constructed in 1983 and is approximately 9,000 square feet in size. At the time of the site visit, a portion of the clinic was in use by Renown Hospitals. The building itself is comprised of a patient waiting area, patient rooms, staff offices, bathrooms, a laboratory, and storage areas. Currently, most of the building is not in use by Renown.
- Evidence of asbestos-containing building materials were observed within the main hospital building.
- Two solar-panel electricity generating systems were observed on the southern portions of the Subject Property and are used to generate power for the facility.
- A sewer manhole was observed proximal to the western exterior wall of the ambulance building. A possibility exists that the manhole provides access for a sand interceptor that eventually drains to the sanitary sewer.
- A diesel-powered generator was observed within a locked exterior structure. Evidence of below ground piping previously used to convey fuel to the generator were observed next to the generator within the structure. A diesel odor and evidence of staining on the concrete floor of the structure were also observed.
- An above ground storage tank containing diesel fuel was observed within a concrete secondary containment structure located proximal to the generator building. Above ground piping leading from the tank and into the building was also observed.

- Two unused generators located within containers were observed. It does not appear that the generators have ever been used on the property.
- One storage container and a storage building were observed on the western edge of the Subject Property. Access to these structures were not provided at the time of the site visit. However, the structures were said to contain hospital records.
- A four foot by five foot structure containing a leaking pipe and formerly used for pumping water to the facility was observed on the southern portion of the site. The interior of the building was in disrepair and a continuous leak was observed from a pipe extending out of the concrete floor.
- Five propane tanks were observed on a concrete pad near the southern portion of the site. The propane tanks are used for heating all of the buildings.
- A 500 gallon diesel tank associated with a former incinerator which previously operated on the property, was permanently closed in May of 1995 via filling with sand. At that time, the tank was filled with sand and the openings secured. On February 21, 1997, the Director of Nye County Public Works provided test results for two samples located proximal to the ends of the tank closed in place. The concentrations of TPH in the two samples were reported to be less than the laboratory detection limit of 10 mg/kg. Based on these results, NDEP provided a letter to Nye County stating that “based on the information provided by Nye County (dated February 21, 1997), the Division will not require remediation at this time”.
- A 750 gallon diesel tank, which conveyed diesel fuel to a generator, was permanently removed from the ground in 1998.
- A 10,000 gallon heating oil tank was abandoned in place in 1999. On December 16, 1998, an assessment was conducted to determine if petroleum product impacts from a 10,000 gallon tank had occurred to the surrounding soil. Two soil borings were advanced at each end of the tank to a maximum depth of 20 feet bgs. Samples were collected at 15 feet bgs and submitted to the laboratory for TPH analysis. The samples were both reported to contain 25 mg/kg which was below the State of Nevada action level for TPH (100 mg/kg). Based on those results and due to a 6-inch water line determined to overly the UST, a request for the UST to be abandoned in place was made to the NDEP. On February 3, 1999, the NDEP provided a letter stating that they had received the report and that contamination levels associated with the 10,000 gallon tank are below Nevada Action Levels and require no further action.

6.2 Historical Recognized Environmental Conditions

No *historical recognized environmental conditions* were found for the Subject Property except as follows:

- A 500 gallon diesel tank associated with a former incinerator which previously operated on the property, was permanently closed in May of 1995. At that time, the tank was filled with sand and the openings secured. On February 21, 1997, the Director of Nye County Public Works provided test results for two samples located proximal to the ends of the tank closed in place. The concentrations of TPH in the two samples were reported to be less than the laboratory detection limit of 10 mg/kg. Based on these results, NDEP provided a letter to Nye County stating that “based on the information provided by Nye County (dated February 21, 1997), the Division will not require remediation at this time”.
- A 10,000 gallon heating oil tank was abandoned in place in 1999. On December 16,

1998, an assessment was conducted to determine if petroleum product impacts from a 10,000 gallon tank had occurred to the surrounding soil. Two soil borings were advanced at each end of the tank to a maximum depth of 20 feet bgs. Samples were collected at 15 feet bgs and submitted to the laboratory for TPH analysis. The samples were both reported to contain 25 mg/kg which was below the State of Nevada action level for TPH (100 mg/kg). Based on those results and due to a 6-inch water line determined to overly the UST, a request for the UST to be abandoned in place was made to the NDEP. On February 3, 1999, the NDEP provided a letter stating that they had received the report and that contamination levels associated with the 10,000 gallon tank are below Nevada Action Levels and require no further action.

6.3 Controlled Recognized Environmental Conditions

No *controlled recognized environmental condition* was found for the Subject Property except as follows:

- A release of petroleum hydrocarbons was discovered on the Subject Property after the removal of a 750 gallon UST. Samples collected at each end of the tank were reported to have TPH concentrations above laboratory detection limits. The sample collected near the west end of the tank was reported to have a TPH concentration of 176 mg/kg, which was above the State of Nevada action level for TPH of 100 mg/kg. Due to the “remote location of the site and the relatively low concentration of TPH encountered during the UST closure” the consultant conducted an A through K site evaluation and based on the evaluation, requested administrative closure for limited soil impact based on the conditions outlined in NAC 459.9973, Sections 1(a) through 1(k). After concurrence by NDEP, a letter stating that no further action was required at that time was provided to Nye Regional Medical Center in February of 1999.

6.4 Recognized Environmental Conditions

No *recognized environmental conditions* were found for the Subject Property except as follows:

- At the time of the site visit, two pipes located proximal to the generator were observed protruding from the concrete floor within the generator structure. The pipes may have been diesel feed pipes for the generator. In addition, vent piping was observed on the exterior wall of the generator structure. It is unknown if the piping (both feed and vent) are associated with one of the tanks previously closed at the site.

6.5 Conclusions

MGA has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527 of the hospital property addressed at 825 Main Street in the Town of Tonopah, 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 controlled recognized environmental conditions or recognized environmental conditions in connection with the Subject Property, except for the following

- A release of petroleum hydrocarbons was discovered on the Subject Property after the removal of a 750 gallon UST. Samples collected at each end of the tank were reported to have TPH concentrations above laboratory detection limits. The sample collected near the west end of the tank was reported to have a TPH concentration of 176 mg/kg, which was

above the State of Nevada action level for TPH of 100 mg/kg. Due to the “remote location of the site and the relatively low concentration of TPH encountered during the UST closure” the consultant conducted an A through K site evaluation and based on the evaluation, requested administrative closure for limited soil impact based on the conditions outlined in NAC 459.9973, Sections 1(a) through 1(k). After concurrence by NDEP, a letter stating that no further action was required at that time was provided to Nye Regional Medical Center in February of 1999.

- At the time of the site visit, two pipes located proximal to the generator were observed protruding from the concrete floor within the generator structure. The pipes may have been diesel feed pipes for the generator. In addition, vent piping was observed on the exterior wall of the generator structure. It is unknown if the piping (both feed and vent) are associated with one of the tanks previously closed at the site.

Based on the information reviewed for this assessment, MGA is of the opinion that additional investigations at the Subject Property, including an asbestos assessment, are warranted at this time.

7. LIMITATIONS

7.1 General

The conclusions and recommendations presented above are based upon the agreed scope of work outlined in the above report. McGinley and Associates, Inc. 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 and Associates, Inc. at the time of writing the report, may result in a modification of the conclusions and recommendations presented. The services performed by McGinley and Associates, Inc. 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 of this report, and cannot be released without consent from McGinley & Associates Inc. If a third party relies on the information provided in this report, McGinley and Associates, Inc. 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 1974. However, this data gap is not considered significant since it is likely all information obtained would be duplicative of information obtained from other sources.
- Historical information found for the Subject Property may have exceeded five year intervals. This data gap is not considered significant as specific use of the property and adjoining properties appears unchanged during the period of time that exceeded five years.
- Past owners were not available within reasonable time and/or cost constraints for interview for this report. However, based on information obtained from EDR and Washoe County records, this data gap is not considered significant since it is likely all information obtained would be duplicative of information obtained from other sources.

8. SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We certify that, to the best of our knowledge and belief, we meet the definition of Environmental Professionals, as defined in 40 CFR §312.10(b). We have specific qualifications based on education, training, and experience to assess a property of this nature, history, and setting. We have developed and performed 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 H.

Respectfully Submitted:

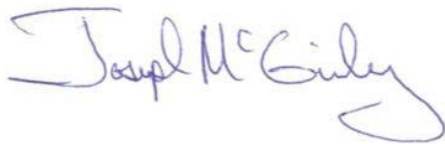
McGinley and Associates, Inc.

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.



Brett Bottenberg, C.E.M. #1690, Exp. Date 10/7/2017
Project Manager

Reviewed by:



Joseph M. McGinley, P.E., P.G., C.E.M. #1036, Exp. Date 11/23/2016
Principal

9. REFERENCES

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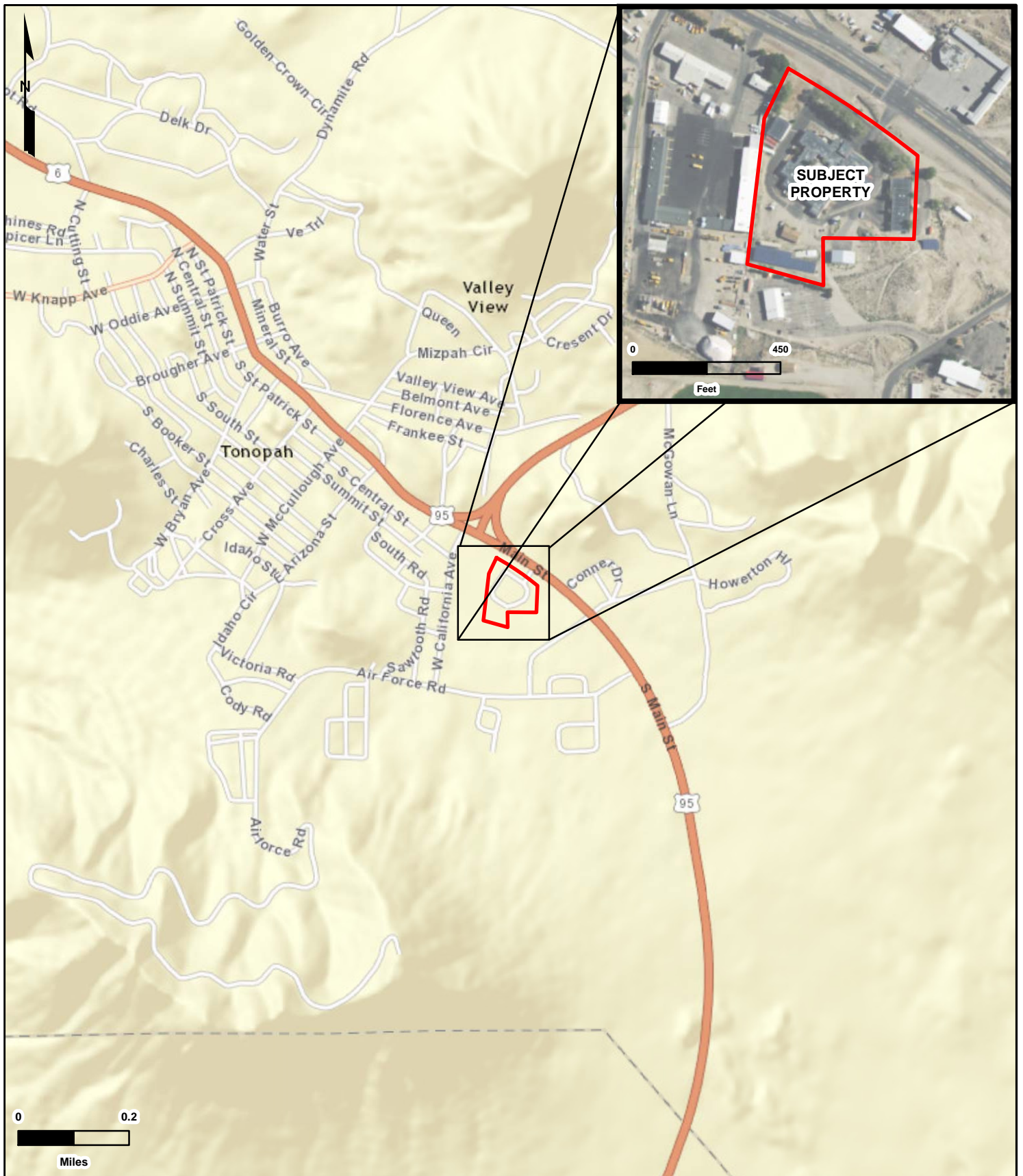
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FIGURE 1

PROJECT LOCATION MAP
-SHOWING-
NYE COUNTY REGIONAL
MEDICAL CENTER
825 S. MAIN STREET
TONOPAH, NEVADA



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REVISIONS	NO.	BY	DATE
A	DESIGNED	RJ	
	DRAWN	TAD	
	CHECKED	RJ	
JOB NO.: BRN-036	APPROVED		

FIGURE 2

**SITE MAP
-SHOWING-
NYE COUNTY REGIONAL
MEDICAL CENTER
825 S. MAIN STREET
TONOPAH, NEVADA**



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