

## PHASE I ESA ACTIVITIES

The purpose of the proposed Phase I ESA activities are to evaluate the subject properties for actual and potential sources of environmental risks and liabilities associated with on-site chemical contamination from on-site or off-site sources. The proposed scope of services will consist of a site reconnaissance visit, regulatory records search, interviews with past and present owners/operators of the property, employees, and public officials, and a written report.

The proposed Phase I ESA will be conducted based upon The Traverse Group's interpretation of and in general conformance with the scope and limitations of the United States Environmental Protection Agency (USEPA) Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), and guidelines established by the American Society for Testing and Materials (ASTM) in the *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process / Designation E 1527-05* (ASTM Standard Practice E 1527-05).

To accomplish this Scope of Work, The Traverse Group will perform the following tasks:

### Task 1 – Site Reconnaissance

The goal of the site reconnaissance is to assess whether conditions suggest that recognized environmental conditions or hazardous substances are present. The Traverse Group will perform an on-site inspection of the grounds of the subject property for visual evidence of recognized environmental conditions that have or could have adversely affected the environmental resources on that property. The Traverse Group will identify current property occupants and document operations. The subject property will be visually inspected for topographic conditions, drainage, surficial soil characteristics and general layout. The property building(s) and property will be inspected to identify and assess the potential for sources of on-site chemical releases. These sources may include but are not limited to: aboveground/underground storage tanks, polychlorinated biphenyl (PCB) containing equipment, areas indicating past chemical usage and waste storage, on-site disposal areas. Evidence of surficial contamination, such as stressed vegetation, stained soil, and stained concrete, will be noted if observed. Adjoining properties will be visually observed from the subject property for similar reasons. Photographs of the subject property and adjoining properties will be taken during the assessment showing the overall general conditions of the properties, discolored soils, or other identified potential concerns or conditions.

## Task 2 - Interviews

The Traverse Group will make a reasonable attempt to interview at least one staff member of one of the following types of local government agencies; the local fire department that serves the property; the local health agency or local/regional office of state health agency; the local agency having jurisdiction over hazardous waste disposal or other environmental matters in the area in which the subject property is located, and/or local agencies responsible for the issuance of building permits or groundwater use permits that document the presence of activity and use limitations on the property. In addition, The Traverse Group will attempt to interview the current owner/operator of the subject property and/or previous owners, employees, or other persons who may have knowledge of past waste practices and activities at the subject property unless directed otherwise by the Client in order to maintain confidentiality.

## Task 3 – Records Research

The purpose of the records review is to identify past land uses and waste disposal practices that may be detrimental to the environmental resources of the subject property. The Traverse Group will include a limited research of physical and historical information of the subject property. The research may include, but will not necessarily be limited to, or all inclusive of, the review of topographic maps, aerial photographs, city directories, historic maps, Sanborn<sup>®</sup> Fire Insurance Maps, previous environmental investigations of the subject property (if available), chain-of-title documents (if provided), visual observations, a review of available City records, and interviews. The extent of research will be subject to the time constraint imposed upon the completion of the assessment.

A record search service will be used to identify sites of concern as outlined in the table below. Publicly available information from local, state, and federal agency databases will be reviewed. The following table identifies the source and search radii of records to be searched by the records search service.

<b>RECORD SEARCH SOURCES</b>	<b>SEARCH RADIUS</b>
EPA National Priority List	1 mile
EPA CERCLA List	½ mile
EPA CERCLA NFRAP List	½ mile
EPA RCRA Treatment, Storage, and/or Disposal Facilities	½ mile
EPA RCRA CORRACTS	1 mile

<b>RECORD SEARCH SOURCES</b>	<b>SEARCH RADIUS</b>
EPA RCRA Hazardous Waste Generators	Subject/adjoining property
Emergency Response Notification System (ERNS) Database	Subject property
Michigan Sites of Environmental Contamination	1 mile
Michigan Leaking Underground Storage Tank (LUST) Sites	½ mile
Michigan Solid Waste Facilities	½ mile
State Registered UST List	Subject/adjoining property
Areas of Critical Environmental Concern	½ mile
Brownfield Sites	½ mile
Federal Land Use	½ mile
State Spills List	Subject/adjoining property

#### Task 4 – Phase I ESA Report

Following completion of the assessment, The Traverse Group will prepare a comprehensive report, which describes the activities performed and discusses in detail the results of the Phase I ESA. The Traverse Group will render a professional opinion as to whether or not recognized environmental conditions exist on-site which pose actual or potential impairment to the subject property, and offer logical recommendations for course of action to further evaluate those concerns, which represent an immediate risk. The Traverse Group will provide four final bound copies of the report with color attachments and one electronic version.

The Traverse Group realizes that this project may be extremely sensitive to public and private scrutiny. Therefore, The Traverse Group maintains strict document control procedures to ensure reporting confidentiality, and that the content of these assessments are held in strict confidence during and upon completion of the project.

To effectively use all available resources, The Traverse Group requests that the Client provide timely access to the subject property, site plans, and accurate information on the subject property location, construction records, related subject property information, copies of previous environmental studies on the subject property, and a copy of the most recent real estate appraisal. The scope of services does not include procurement of a 50-year chain-of-title document. If deemed necessary, The Traverse Group can provide a 50-year environmental title search for the subject property at an additional cost.

## **COMMUNITY OUTREACH**

A key component of any EPA Site Assessment Grant is community outreach and involvement. By arming the community with knowledge, public involvement can result in better solutions and help facilitate project implementation. Community outreach will help educate the public, developers, and other stakeholders in order to keep the momentum going for brownfield redevelopment projects in their community. The Traverse Group recognizes that each brownfield project requires a clear understanding of the goals of the community, excellent communication, the ability to engage and empower all stakeholder groups, and the ability to provide real economic development opportunities while still providing environmental safeguards to future occupants of the property. We also realize that on a larger scale, brownfield redevelopment should be but one component of community revitalization.

Our community outreach and education presentations utilize the full capability of our Information Technology Department including websites and educational videos. Our EPA and Clean Michigan Initiative projects have the most formalized community outreach and education programs tailored to meet the needs of each community. The Traverse Group is fully qualified to conduct workshops for the DEA with participant representation from municipalities, residents, non-profit organizations, and real estate professionals.