

Phase I Environmental Site Assessment

2490 Forrest Avenue
Dover, Delaware

June 2018

Project No. 11825.EA



DUFFIELD
ASSOCIATES
Soil, Water & the Environment

Civil



Water/Natural Resources



Geotechnical



Environmental



Construction Review



Coastal/Waterfront



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SUMMARY

This report summarizes Duffield Associates, Inc.'s (Duffield's) Phase I Environmental Site Assessment (ESA) of 2490 Forrest Avenue, in Dover, Delaware (the "Property"). The purpose of this Phase I ESA was to provide environmental due diligence prior to potential purchase of the Property.

Based on the information gathered for this assessment, the Property was utilized as a gasoline station from some time prior to the late 1970s to 2010.

Per ASTM E1527-13, Duffield reviewed the gathered information to identify recognized environmental conditions (RECs). Duffield also considered the presence of "controlled" RECs (CRECs) and "historical" RECs (HRECs) as defined by the ASTM 1527-13 standard. No RECs, HRECs, or CRECs were identified in connection with the Property, except for the following:

- A release of gasoline occurred from a supply line serving one of five underground storage tanks (USTs) at the Property in 2008. The underground storage tanks (USTs) were removed from the Property in 2010, and remedial activities resulted in the Department of Natural Resources and Environmental Control, Tank Management Section (DNREC-TMS) issuing a conditional "No Further Action" (NFA) letter dated December 9, 2014. The conditions of the NFA included the preparation of a contaminated materials management plan (CMMP) if petroleum-impacted soils or groundwater are to be disturbed. The presence of residual petroleum products in soil and groundwater is a REC. Because of the conditions attached to the NFA letter, the former gasoline release also is considered a CREC for the Property.
- Pursuant to a request for "Non Scope" services included as part of this assessment, Duffield collected a water sample from the supply well serving the Property for selected laboratory analysis. Dissolved lead was reported in the water sample at a concentration of 0.025 milligrams per liter or parts per million (ppm), exceeding the Environmental Protection Agency's (EPAs) Primary Drinking Water Standard, Maximum Concentration Level (MCL) of 0.015 ppm permitted in drinking water supplies. The volatile organic compounds (VOCs) acetone, methylene chloride, 2-butanone, and 4-methyl-2-pentanone were also detected in the water supply sample. The presence of the VOCs and the concentration of lead reported in the water sample represents a REC for the Property.

Recommendations related to the listed RECs are included in Section 7, Part D of this report.

1. INTRODUCTION

This report summarizes Duffield's Phase I Environmental Site Assessment (ESA) of 2490 Forrest Avenue, in Dover, Delaware (the "Property"). The assessment was performed in general accordance with the practice outlined in ASTM International's "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessments Process" (ASTM E 1527-13). The ASTM E 1527-13 practice is recognized under the United States, Environmental Protection Agency's (EPA) "Standards and Practices for All Appropriate Inquiries" (Code of Federal Regulations, Title 40, Part 312).

A. LOCATION AND LEGAL DESCRIPTION

The Property is located on the northern side of Forrest Avenue, west of Sharon Hill Road in Dover, Delaware. Figure 1 (Site Location Sketch) depicts the approximate location of the Property. The Property comprises Kent County Tax Parcel Number 2-00-07502-01-1300-00001. The tax parcel information for the Property is included in Appendix A.

B. PURPOSE

The purpose of the Phase I ESA is to identify recognized environmental conditions (RECs) at the Property. Within limitations, the term REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

C. DETAILED SCOPE OF SERVICES

Duffield reviewed selected historical and regulatory information pertaining to the Property and nearby lands, and performed a walking visual reconnaissance in accordance with the scope of services described in our proposal, dated April 13, 2018. A copy of the scope of services is provided in Appendix B.

D. SIGNIFICANT ASSUMPTIONS

This report is based on Duffield's professional judgment of environmental conditions observed during our visual reconnaissance of the Property, our interpretation of the reviewed aerial photographs, historical documents, regulatory information, and information conveyed to us through interviews. Our ability to effectively identify and assess environmental conditions is based on assumptions that: the conditions of concern were visible; the documents reviewed provide a reasonable and accurate record of historic land use and practices; and the interviewees provided thoughtful and truthful responses to the questions posed, and are familiar with past practices and occurrences at the Property.

The environmental professional's qualifications are presented in Appendix C. The environmental professional's statement and signature are presented in Section 8.

E. LIMITATIONS AND EXCEPTIONS

While this evaluation was performed in an effort to generally characterize the environmental conditions of the Property, the observations, conclusions, and recommendations are based solely on conditions encountered at the time of the reconnaissance effort. Latent conditions and other contingencies bearing upon the environmental condition of the site may be evident in the future.

F. SPECIAL TERMS AND CONDITIONS

No special terms or conditions were necessary for this assessment.

G. USER RELIANCE

This report has been prepared for the Kent County Levy Court, the "User" of this document. The Kent County Levy Court is represented by Michael J. Petit de Mange. The Kent County Levy Court may rely on this report subject to the terms and conditions specified in our proposal dated April 13, 2018. No parties other than the Kent County Levy Court may rely upon the information contained in this report without the prior written consent of Duffield.

2. USER-PROVIDED INFORMATION

A. ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS

Duffield's subcontractor, JSR Vetting, performed a search for environmental liens and activity and use limitations (AULs) on the Property from July 23, 2010 through April 25, 2018. According to the environmental lien search report, no environmental liens were identified (see Appendix D).

B. SPECIALIZED KNOWLEDGE

Mr. Michael Petit de Mange, a representative of the User of this report, completed a Questionnaire to support preparation of this Phase I ESA (Appendix E). Responses to the Questionnaire indicated that Mr. Petit de Mange is aware that the Property was formerly used as gasoline station and has had a history of regulatory actions related to leaking underground storage tanks (LUSTs). Mr. Petit de Mange also indicated that he was aware that the Property was subject to cleanup and monitoring requirements by DNREC.

C. COMMONLY KNOWN OR REASONABLY ASCERTAINABLE INFORMATION

According to the completed User Questionnaire, Mr. Petit de Mange is not aware of any commonly known or reasonably ascertainable information regarding the Property.

D. VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES

According to the information provided in User Questionnaire, Mr. Petit De Mange indicated that an appraisal has not been completed for the Property, but will be completed following the completion of this Phase I Environmental Assessment. .

E. OWNERS, PROPERTY MANAGER, AND OCCUPANT INFORMATION

- Owner: The current owner of the Property is 1776 Investments & Holdings.
- Occupant: The Property is currently developed with a vacant convenience store building. There were no occupants.

F. REASON FOR PERFORMING PHASE I

The User of this report is performing environmental due diligence prior to potential purchase of the Property.

3. RECORDS REVIEW

A. PHYSICAL SETTING SOURCE

Based on our review of a United States Geological Survey (USGS) topographic map (see Figure 1 – Site Location Map), the Property ranges from approximately 40 to 50 feet in elevation referenced to the North America Vertical Datum of 1988 (NAVD88). Surface topography generally slopes north towards a creek identified as Cahoon Branch. Topography suggests that stormwater from the Property drains in the direction of Cahoon Branch. Groundwater monitoring performed during the remediation of a gasoline release on the Property indicated that groundwater also flows to the north in the direction of Cahoon Branch (May 2014 groundwater monitoring report prepared by Atlantic Hydrologic, Inc.)

Environmental regulatory databases were reviewed and summarized by our subcontractor, Environmental Data Resources, Inc. (EDR), for sites identified within the ASTM E 1527-13 prescribed search radii. EDR's report (Radius Map Report) presents a summary of the database search results. This report, dated April 20, 2018 is included in Appendix F.

Table A (below) refines the Radius Map Report's search results to listings of the Property, adjoining sites, and potentially "upgradient" sites within the search radii only.

Locations of potentially “upgradient” sites are estimated based on the anticipated groundwater flow direction as described in Section 3.A (Physical Setting Source).

The Property was listed in the environmental databases with the following results in reference to Table A:

- Leaking Underground Storage Tank (LUST) site.
- Registered underground storage tank.

Discussions of the sites, listed below in Table A, are provided in Section 8.A

Table A: Refined Environmental Database Site Listings
 (The Property, adjoining sites, and upgradient sites within search radius)

Regulatory Database	Search Radius (miles)	Site Name	Site Address
Federal NPL site list	1.0	None	None
Federal Delisted NPL site list	0.5	None	None
Federal SEMS list	0.5	None	None
Federal SEMS-Archive	0.5	None	None
Federal RCRA Corrective Action Report (CORRACTS)	1.0	None	None
Federal RCRA non-CORRACTS TSD	0.5	None	None
Federal RCRA generators list	Property/ Adjoining	None	None
Federal institutional control/engineering control	Property only	None	None
Federal Emergency Response Notification System list	Property only	None	None
SHWS - State NPL	1.0	Artis Drive Site	141 Artis Drive
State CERCLIS	0.5	None	None
State landfill and/or solid waste disposal sites	0.5	None	None
State leaking storage tank lists (LUST/LAST)	0.5	The Property	2490 Forrest Ave
		Kelly, John R	739 Artis Drive
State registered storage tank lists	Property/ Adjoining	The Property	2490 Forrest Ave
State institutional control/engineering control	Property only	None	None
State voluntary cleanup program (VCP) sites	0.5	None	None
State Brownfield sites	0.5	None	None

Notes: This table should only be referenced within the context of this report.

SWHS = State Hazardous Waste Site

SEMS = Superfund Enterprise Management System

RCRA = Resource Conservation Recovery Act

TSD = Treatment, Storage, and Disposal

Upgradient = Groundwater may flow from an upgradient site downgradient beneath the Property. Sites located upgradient of the Property have the potential to affect the environmental conditions of the Property.

C. REGULATORY AGENCY FILE AND RECORDS REVIEW

The Property was identified on one or more of the “standard environmental record sources” referenced in Section 3.B (Standard Environmental Record Sources). The ASTM E1527-13 method (Section 8.2.2) requires an opinion from the Environmental Professional regarding whether a “regulatory file review” is warranted. The “regulatory file review” conventionally refers to a visit to the Federal or State environmental regulatory agency’s file room. For this assessment, the Property was identified in multiple environmental record sources. Additional Environmental Record Sources (listed in Section 3.D below) and first-hand knowledge of the Property by Duffield personnel allowed the Environmental Professional to provide an opinion regarding the presence or absence of RECs. Therefore, an in-person file review was not performed.

D. ADDITIONAL ENVIRONMENTAL RECORD SOURCES

Duffield reviewed the DNREC’s Delaware Environmental Navigator (DEN) on-line database and found several documents regarding the sites listed in Table A.

- The Property – the Property is listed in the DEN as a registered UST site and LUST site under the names Express 24 and Super Soda Center. Records on the DEN indicate that five underground storage tanks were registered for the Property. The tanks were removed from the Property on May 12, 2010. Prior to removal, a release of gasoline was discovered during a tightness test of the tank systems in 2008. Remedial actions and groundwater monitoring were performed, and a NFA letter was issued for the Property in December 2014. A copy of the last monitoring report and request for no further action prepared by Atlantic Hydrologic, Inc. and the follow-up NFA letter from DNREC are included as Appendix G.
- Crescent Farm – Three USTs were removed from the Crescent Farm site, located approximately 2,000 feet southwest of the Property. Evidence of a release was indicated for a 3,000-gallon heating oil UST removed from the site. A hydrogeologic evaluation was completed for the site and the DNREC-TMS indicated that No Further Action was warranted for the site. A copy of the NFA letter is included in Appendix H.

- Artis Drive – A report prepared by the DNREC Solid Waste Branch was found regarding the discovery and remediation of a small dumpsite located upgradient and approximately 3,300 feet south of the Property. The report is included in Appendix I. DNREC recommended No Further Action for the dumpsite in 1985.

4. HISTORICAL USE INFORMATION

Duffield reviewed historical aerial photographs obtained from the Delaware Environmental Monitoring and Analysis Center (DEMAC). Duffield also requested historic topographic maps and Sanborn fire insurance maps from EDR. The historical use information, summarized below, was reviewed for past uses of the Property and surrounding areas that may affect environmental conditions at the Property. Discussions of environmental concerns, if any, listed below, are provided in Section 8.A (Findings and Opinions).

A. HISTORICAL FIRE INSURANCE MAPS

Duffield requested Sanborn Fire Insurance Maps (Sanborn Maps) from our subcontractor, EDR, to evaluate historical usage that may affect environmental conditions both at the Property and in surrounding areas. According to EDR's Certified Sanborn Map Report, no Sanborn Maps were available for the Property. The Certified Sanborn Map Report is included in Appendix J.

B. HISTORICAL AERIAL PHOTOGRAPHS

Duffield reviewed aerial photographs obtained via the Delaware Environmental Monitoring and Analysis Center, to evaluate historical usage that may have affected environmental conditions both at the Property and in the surrounding area. Duffield's review included photographs from the years 1937, 1954, 1961, 1968, 1992, 1997, 2002, 2006, 2007, 2009, 2011, 2012, and 2013. The following summarizes pertinent information from our review of the aerial photographs, copies of which have been included in Appendix K.

Table B: Historical Aerial Photograph Summary

Aerial Photograph Date	The Property	Adjoining Sites
1937	The Property appears to be undeveloped. The northern portion of the Property appears to be wooded.	The adjoining site to the north appears to be wooded. The adjoining site to the east appears to be partially developed, and partially wooded. The adjoining site to the south appears to be developed with a residential home, and utilized for agricultural purposes. The adjoining site to the west appears to be developed with at least one building structure.
1954	No obvious changes to the Property.	The uses of the adjoining sites cannot be determined due to distortion of the 1954 image.
1961	No obvious changes to the Property.	No obvious changes to the adjoining site to the north. The adjoining site to the east appears to be occupied by at least one structure. No obvious changes to the adjoining sites to the south and west.
1968	A large area of soil disturbance is apparent on the Property.	No obvious changes to the adjoining sites.
1992	The Property appears to be developed with one building structure, as well as a large concrete pad. An area of soil disturbance is apparent on the central portion of the Property.	The adjoining site to the north contains a residential home. The adjoining site to the east contains at least two structures. No obvious changes to the adjoining sites to the south and west.
1997	A canopy, likely covering former fuel dispensers, is apparent on the southern portion of the Property. An area of soil disturbance is apparent north of the structure on the Property.	No obvious changes to the adjoining sites.
2002 - 2009	The area of soil disturbance north of the structure on the Property is no longer apparent.	No obvious changes to the adjoining sites.
2011 - 2013	The canopy on the southern portion of the Property is no longer apparent.	No obvious changes to the adjoining sites.

C. HISTORICAL TOPOGRAPHY MAPS

Duffield reviewed topography maps provided by EDR to evaluate historic uses of the Property that may be of environmental concern, such as tanks, quarries, mines, or orchards. Our review included topography maps from the years 1899, 1906, 1926, 1930, 1931, 1956, 1981, 1993, and 2014. The following table summarizes information from the review of historical topography maps, which have been included in Appendix L.

Table C: Historical Topography Map Summary

Topography Map Date	The Property	Adjoining Sites
1899-1931	The Property appears to be undeveloped land. A stream is depicted on the Property.	The adjoining sites appear to be undeveloped land.
1956 - 1981	The Property appears to be occupied by at least two small buildings.	The adjoining site to the north appears to be undeveloped. A pond is also depicted to the north of the Property. The adjoining sites to the east, west, and south appear to be residential sites. A cemetery is depicted to the southwest of the Property.
1993 - 2014	No obvious changes to the Property.	A structure is depicted on the adjoining site to the north, likely a residential dwelling. No obvious changes to the adjoining sites to the east and west. A depression is depicted on the adjoining site to the south, possibly associated with the present day horse farm.

5. SITE RECONNAISSANCE

Mr. Cole Petrillo (Project Scientist with Duffield) completed a reconnaissance of the Property on May 21, 2018. The walking reconnaissance consisted of a visual review of present site conditions for indications of RECs. Observed site conditions during the site reconnaissance alluded to the former use of the Property as a gasoline filling station and convenience store, but at the time of the visit, the Property was unoccupied.

A. METHODOLOGY AND LIMITING CONDITIONS

Duffield personnel encountered limiting conditions during the walking reconnaissance of the Property. Very thick vegetation covering most of the Property north of the building limited access and the ability to review that area.

B. SITE SETTING

The Property is located along the northern side of Forrest Road, near Dover, Delaware. Land use in the vicinity of the Property was residential and agricultural. Wooded areas were associated with Cahoon Branch running along the north boundary of the Property.

1. CURRENT USE OF THE PROPERTY

The Property is currently occupied by a vacant convenience store.

2. DESCRIPTIONS OF STRUCTURES, ROADS, AND OTHER IMPROVEMENTS ON THE PROPERTY

At the time of site reconnaissance, the Property contained one building and one storage shed.

3. CURRENT USES OF ADJOINING PROPERTIES

The adjoining sites were used for residential purposes. The following describes each adjoining site:

- North: The adjoining site to the north was occupied by a residential dwelling.
- East: The adjoining site to the east (Photograph 1) was occupied by a residential dwelling.
- South: The adjoining site to the south (Photograph 2) was occupied by a residential dwelling.
- West: The adjoining site to the west was occupied by a residential dwelling.

C. EXTERIOR OBSERVATIONS

The area to the south and west of the building was finished with concrete. The area to the east of the building was covered in gravel, and was reportedly the location where five underground storage tanks were removed from the Property. The area to the north of the building was overgrown with thick vegetation (Photograph 3). A utility trailer (Photograph 4), as well as a food service trailer (Photograph 5) were observed on the Property. A shed was also observed on the Property. Disposed solid waste in the form of household refuse was observed on the Property.

D. INTERIOR OBSERVATIONS

The main building was unoccupied at the time of site reconnaissance, however, it appeared to be consistent with the past use as a convenience store. The building contained a main store area (Photograph 6), a walk-in refrigerator (Photograph 7), and a restroom. The interior was somewhat dilapidated and building materials were scattered throughout the interior of the building. *De minimis* quantities of paint containers were observed in the building (Photograph 8). Two floor drains were observed in the building (represented by Photograph 9). No indications of staining was observed around the floor drains.

6. INTERVIEWS

A. INTERVIEW WITH OWNER

The listed owner of the Property is 1776 Investments & Holdings, represented by Mr. Robert Duncan. Duffield completed an interview with Mr. Duncan on June 6, 2018. A

copy of the interview form completed by Mr. Duncan is included as Appendix M. The following information was noted from the interview.

- Mr. Duncan purchased the Property in the late 1970s from Mr. John Watts.
- Mr. Watts had used the Property as a gasoline station and USTs were in-place when Mr. Duncan purchased the Property.
- Mr. Duncan used the USTs left by Mr. Watts and installed newer USTs in the same tank field. Mr. Duncan could not recall which tanks were the older ones, but all were located in the same tank field and removed from the Property in 2010.
- Mr. Duncan indicated that the Property was not used for automobile repair by Mr. Watts or by Mr. Duncan.
- Mr. Duncan did not know the depth of the supply well serving the Property.
- Mr. Duncan indicated that the Property is served by a gravity septic system and the septic tank is located behind the building. Mr. Duncan also indicated that the septic system has always functioned properly.

B. INTERVIEW WITH GOVERNMENT OFFICIALS

Duffield contacted Mr. Alex Rittberg of the DNREC Tank Management Section (TMS) on May 24, 2018 for information regarding the Property. Mr. Rittberg stated that any documents providing information of environmental concern could be found on the Delaware Environmental Navigator (DEN) database. Information found on the DEN database is included in Section 3.D of this report.

7. EVALUATION

Duffield's environmental professional has evaluated the data used to support the preparation of this Phase I ESA report. The environmental professional's qualifications and those of the project scientist are presented in Appendix B. The environmental professional's statement and signature are presented in Section 8.

A. FINDINGS AND OPINIONS

Duffield reviewed the gathered information to identify RECs. According to 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: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. RECs do not include *de minimis* conditions, which generally do not present a threat to human health or the environment and generally would not be the subject of an enforcement action if brought to the attention of regulatory agencies.

- **The Property.** A petroleum release was reported to have occurred on the Property in 2008. Five USTs were removed from the Property in 2010. A NFA letter was issued to the Property in December 2014 in regards to a release of gasoline that occurred prior to

the tank removal process. The referenced NFA letter for the Property included conditions for site use. Those conditions included the preparation of a CMMP if petroleum-impacted soils or groundwater is to be disturbed. Any petroleum-impacted soils that are excavated may not be re-used as clean fill, and any re-use of excavated soils must be approved in advance by the DNREC-TMS. If petroleum-impacted soils are to be transported off-site, it must be hauled by a State-licensed solid waste hauler and disposed of in an approved manner.

Pursuant to a request for “Non Scope” services included as part of this assessment and described in Section 8 of this report, Duffield collected a water sample from the supply well serving the Property for selected laboratory analysis. Lead was reported in the water sample at a concentration of 0.025 ppm, exceeding the EPA’s MCL of 0.015 ppm in drinking water supplies. Lead detected in water derived from drinking water wells can originate from steel well casings, pumps, and piping solder. Another potential source could be leaded gasoline released from the older USTs that served the Property.

B. DATA GAPS

A data gap is an absence of information or an inability to obtain information required by ASTM E 1527-13 despite *good faith* efforts by the environmental professional to gather such information. No data gaps were identified during completion of this Phase I ESA.

C. DEVIATIONS

There were no deviations from the proposed scope of services.

D. CONCLUSIONS

Duffield has performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E 1527-13 of the Property, located at 2490 Forrest Avenue in Dover, Delaware. Any exceptions to, or deletions from, this practice are described in Section 7.C (Deviations) of this report. This assessment has revealed no evidence of RECs in connection with the Property, except for the following:

- Because residual petroleum substances are present in the subsurface of the Property, the historic gasoline release from the tanks are considered a REC for the Property. Because conditions for site use have been attached to DNREC’s NFA letter for the Property, the gasoline release is also considered a controlled REC or CREC. In the event that future soil excavation is planned, a CMMP should be issued to the DNREC-TMS, and any excavated soils that are found to be impacted with petroleum products would have to be handled in accordance with the CMMP.
- The detection of lead at a concentration exceeding the EPA Primary MCL of 0.015 ppm and VOCs in the water supply well sample represents a REC for the Property. Collection of a second, confirmatory sample is often completed to confirm the presence or absence of the contaminants. In the event that the containments are

confirmed to be present in the water supply, and the water will be used for consumption, potential options to address the contaminants include: (1) a water treatment system; (2) installation of a replacement well drilled into a deeper, confined aquifer; or (3) a public water supply if available.

8. NON-SCOPE SERVICES

Duffield Associates collected a representative water samples from the supply well serving the Property on May 21, 2018. The water system was flushed prior to sampling for a period of 15 minutes to purge stagnant water from the pump, well casing, and piping. In addition, a flame was applied to spigot from which the sample was collected to eliminate any potential any bacteria at the opening of the tap.

The water samples were submitted to Envirocorp Laboratories, Inc. for analysis of coliform and fecal coliform bacteria, nitrates, and dissolved lead. A portion of the sample was also submitted to Test America, Inc. for analysis of the Environmental Protection Agency Target Compound List of volatiles organic compounds (VOCs). Copies of the laboratory reports are included as Appendix N. The analytical results are summarized as follows.

- Dissolved lead was reported at a concentration of 0.025 ppm, exceeding the EPA Primary MCL of 0.015 ppm.
- Nitrates were reported in the water sample at a concentration of 9.27 ppm. The EPA and Delaware Department of Health and Social Services currently maintains a Primary Drinking Water Standard MCL of 10 ppm.
- Neither coliform nor fecal coliform bacteria were detected in the water sample.
- The volatile organic compounds acetone, methylene chloride, 2-Butanone and 4-methyl-2-pentanone were detected in the water supply sample. Acetone and methylene chloride are often detected as laboratory contaminants, but 2-Butanone and 4-methyl-2-pentanone are used in plastics.

No additional services beyond the scope of the ASTM E 1527-13 standard were requested at the time of this Phase I ESA.

9. STATEMENT OF ENVIRONMENTAL PROFESSIONAL

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of the United States Environmental Protection Agency's "Standards and Practices for All Appropriate Inquiries" Code of Federal Regulations Title 40, Part 312 (40 CFR Part 312). I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all-appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Steven Cahill, P.G.
Environmental Professional

10. REFERENCES

- ASTM International, 2013. *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM-E1527-13.*
- Delaware Environmental Navigator. Website: www.nav.dnrec.delaware.gov
- Environmental Data Resources, Inc. Website <http://www.edrnet.com/>
- JSR Vetting Services, LLC. *Environmental Lien Search.*

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