

PHASE I ENVIRONMENTAL SITE ASSESSMENT

AmSkills Site (4.35 ± Acres and 0.1 ± Acre Pasco Co. Parcel)
4606 Darlington Avenue
Holiday, Pasco County, Florida

TABLE OF CONTENTS

	<u>Page</u>
1.0 EXECUTIVE SUMMARY, FINDINGS, OPINIONS, CONCLUSIONS	1
2.0 INTRODUCTION	8
3.0 USER PROVIDED INFORMATION	12
3.1 Environmental Liens or Activity and Use Limitations (AULs)	
3.2 Specialized Knowledge or Experience of the User	
3.3 Actual Knowledge of the User	
3.4 Reasons for Significantly Lower Purchase Price	
3.5 Commonly Known or Reasonably Ascertainable Information	
3.6 Degree of Obviousness	
3.7 Reasons for Performing Phase I ESA	
3.8 User Provided Environmental Reports	
4.0 SITE RECONNAISSANCE	13
4.1 Site Name	
4.2 Location	
4.3 Inspection Date	
4.4 Site Inspector	
4.5 Site Representative Present	
4.6 Inspection Process and Procedures	
4.7 Surface Access and Egress	
4.8 General Description of Current Improvements and Site Uses	
4.9 Specific Site Observations	
4.10 AST/UST Systems	
4.11 Transformers and PCB Equipment	
4.12 Hazardous Substances and Petroleum Products	
4.13 Drums and Storage Containers	
4.14 Area Reconnaissance (including Vapor Migration Potential)	
5.0 RECORDS REVIEW	18
5.1 Physical Setting Sources	
5.2 Review of Aerial Photographs	
5.3 City Street Directories	
5.4 Sanborn® Maps	
5.5 Historical Topographic Maps	
5.6 History of Property Use	
5.7 Federal and State Regulatory Agency Records Review	
5.8 Tribal Lands Records Review	
5.9 Local Agency Records Review (including Property Ownership Records from Appraiser)	
6.0 INTERVIEWS	28
6.1 Owners	
6.2 Occupants	
6.3 Operators	
6.4 Government Officials	
6.5 Others (including Past Owners/Occupants/Operators)	
7.0 EVALUATION	29
7.1 Findings	
7.2 Opinions	
7.3 Conclusions	
7.4 Additional Investigations Required to Form Conclusion	
7.5 Data Failures/Data Gaps	
7.6 Deviations from ASTM E1527-21	
7.7 Additional Services Performed	
7.8 Signature of Environmental Professional	
7.9 Statement of Qualifications	
8.0 NON-ASTM E1527-21 SCOPE ITEMS.....	32

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TABLE OF CONTENTS (CONTINUED)

9.0 APPENDICES

33

Appendix A – Glossary of Terms Used in ASTM E1527-21
Appendix B – Site Photographs
Appendix C – Physical Setting Resource Documentation
Appendix D – Historical Research Documentation
Appendix E – Regulatory Records Documentation
Appendix F – Property-related Documentation
Appendix G – Interview Documentation
Appendix H – Qualifications of Participating Professionals

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Holiday, Pasco County, Florida

1.0 INTRODUCTION/SUMMARY/FINDINGS/OPINIONS/CONCLUSIONS

1.1 Site Name

AmSkills Site (4.35 ± Acres and 0.1 ± Pasco Co. Parcel)

1.2 Site Location (see **Figure 1 after **Page 13**)**

4606 Darlington Avenue (for all addresses see below)

Holiday, Pasco County, Florida

Section

Section 30 of Township 26S, Range 16E

Pasco County Parcel Numbers (from Pasco County Property Appraiser)

<u>Parcel Number</u>	<u>Acres</u>	<u>Owner</u>	<u>Addresses</u>
30-26-16-0010-03800-0010	3.26	AmSkills, Inc.	4606
30-26-16-0010-03800-0030	0.77	AmSkills, Inc.	4620, 4622, 4624, 4626, 4628, 4630, 4632
30-26-16-0010-03800-0040	0.32	AmSkills, Inc	None listed
30-26-16-0010-03800-0031	0.10	Pasco County	None listed

1.3 Inspection Date

An environmental professional (EP) from Land Assessment Services, Inc. (LAS) inspected the subject property 11/30/22. Weather was 81° and partly cloudy.

1.4 Assessment Team

Richard C. Reynolds, EP, President (inspector 11/30/22)

John W. McMullen, EP, PG

1.5 Summary

Site Description (see **Figure 2** after **Page 15**)

A representative for LAS (EP) visited the subject property on the afternoon of 11/30/22 from 1:30-2:30 pm. Weather was partly cloudy and 81° F. Off-site reconnaissance was performed from 12:30-1:30 pm.

The main structure was on the south side of the subject property. It was the former location of the Polish American Club which had been adapted for use as the AmSkills training facility. The building was primarily constructed out of steel but had a stone façade and an aluminum canopy on its west side covering a decorative entranceway. In the asphalt pavement on the west side of this building were number of cuts most of which were for electrical connections. Also, on the west side of this building was a chain-link/barbed wire enclosure at its southwest corner which was empty. On the north side of the steel building were two (2) chain-link/barbed wire enclosures at each corner. The northwest enclosure had empty yellow metal lockers for future use in storing hazardous/flammable materials. In between these two fence enclosures were stockpiles of concrete forms. The northeast enclosure was empty. On the north side was one rolling door. North of the building was a steel table, empty 55-gallon plastic drum, and an empty 100-gallon plastic water tank. A septic tank and drain field were located in the grassy area on the east side of the building. Also, in this area were a closed storage trailer, pole-mounted electrical transformers, a trailer, a collection of paint cans on a cart (heat wrapped), and an electric-powered water well. Off the southeast corner was a fenced enclosure that was formally the area we believe where natural gas storage was present in addition to a possible cooking grease vat. There were, however, two manhole covers that indicated there was an underground grease trap off the southeast corner.

Inside the structure the occupants were in the process of setting up a training facility with computer-controlled machines, punch presses, and other kinds of machines, most of which were either heat wrapped or in wood cases. At the entrance to the building on its west side were number of rolling lockers and toolboxes. Also noted in the training area were tables, computers on a pallet, and rolling plastic garbage cans. A battery-powered forklift was observed.

Further west of the training facility was an office trailer out of which AmSkills employees currently work, storage trailer, and dumpster. At the entrance into the facility off the unnamed road to the west (Valdes property) was another electric powered water well/pump. In the asphalt pavement around the main structure, we noted some underground storm water drains.

In the northwest section of the property within a chain-link fence were parked a number of RVs, boats, and trailers as well as an electric powered water well in the southeast corner of this section. This area is rented out by the public for storage of large items. On the south side of the chain-link fence enclosure were number of vehicles belonging to the employees.

The northeast parcel of the subject property was an undulating grassy area with some large trees and cacti in its southeast corner. Two areas of pavement, one off Darlington Road and the other further south enclosed an elevated grassy area that appeared to have been at one time the foundation of a former building. Two metal posts were off the road which formally held the business' road sign. On the west side of this tract was a narrow rectangular parcel; an apparent abandoned road. The client indicated that this strip of land will be given to AmSkills as part of the transaction or at some future date. In this strip, LAS noted number of small and large groundwater monitoring (test) wells. This was the former location of a 2,000-gallon underground storage tank (UST) for leaded gas.

AmSkills provided MSDS sheets (see **Appendix E** for links) indicating the following potentially “hazardous” materials and petroleum products used on-site. LAS viewed the presence of none of these materials as “actionable” in terms of actual or intended uses and/or quantities/volumes kept on hand. *It is assumed that these materials will be properly stored once the facility is set up and that any waste products will be properly collected and disposed.*

Lithium Grease	Diesel Exhaust Fluid
Hydraulic Oil	Gasoline/Diesel Fuels
SAE 15/40W	Paint (Latex) (Industrial Enamel)
Metal Working Fluid	Adhesive

Adjoining Sites

North—Darlington Road, single family residential (Orangewood Village), water pump station (Sunshine Water Services Company—30-26-16-0110-00000-4240)

South—Property owned by Valdes Family Properties, LLC (Florida Diamond Center, parking—30-26-16-0010-03800-0000) and Pasco Storage Inc. (storage, retention area for subject site—30-26-16-0010-03800-0050)

East—Internal Medicine practice (Jeffrey M. Davis MD, 4642 Darlington Road—30-26-16-0010-03700-0010) and single-family homes (Orangewood Village) west and east of Grandin Street.

West—Properties owned by Valdes Family Properties, LLC , including private road (primary access to subject property at time of site reconnaissance—30-26-16-0010-03800-0020), properties south to north owned by United Dean Properties, LLC (Doctor’s Urgent Care—30-26-16-0010-03900-0090), GTE Florida, Inc. (Frontier—30-26-16-0010-03900-0071), Christopher F. Rennert, Inc. (used car dealer, office/warehouse—30-26-16-0010-03900-0061), and Holiday Florida Investment Properties, LLC (Walgreen Co.—30-26-16-0010-03900-0010), Julie Lane, Anthony & Mary Ann Saravanos (OnPoint Fashions—30-25-16-0010-03900-0070), Judy’s Natural Foods, Inc. (restaurant—30-26-16-0010-03900-0060), Nick Leone & Mildred A Leone Trust (Goodyear, auto repair—30-26-16-0010-03900-0040), US Highway 19.

Site History

The site was undeveloped, wooded and vacant until planted with citrus between 1951 and 1962. The building occupied by the Polish Club was constructed in 1973. Other structures in the northeast section were constructed prior to 1982, most likely in 1975. The buildings in the northeast section were occupied Interstate Brands, a wholly owned subsidiary of Hostess Brands, Inc. (bread products) until that company filed for bankruptcy in 2012. This branch was in all probability a warehouse/distributor for the area. AmSkills took possession of the site in late 2021 and is in the process of converting the former social club building into a training facility. In the meantime, portions of the site have been fenced off to operate an “RV” storage business.

Regulatory Records Review

LAS identified 17 facilities within ASTM-specified search radii. **The subject property was found listed** with a previous leaking UST (FDEP Fac. No. 8630293). LAS has summarized the data available on the UST below. LAS also provides information on ten (10) other facilities in the vicinity of subject property (within ¼ of a mile), only one of which (adjacent Walgreens) was at a higher reported elevation. A CERLIS site 1,690 feet south of the subject property (Tarpon Tool Corporation, EDM No. 13) was discounted due to its distance away from the property although at a higher reported elevation and intervening hydraulic barriers.

Facility	Facility	Address	Lists	Direction/ Miles/ Feet ±/ Elevation	Comments
INTERSTATE BRANDS CO-HOLIDAY EDM No. 1	INTERSTATE BRANDS CO-HOLIDAY	4630 E DARLINGTON RD HOLIDAY, FL 34690	LUST TANKS	SUBJECT PROPERTY (PASCO CO. PARCEL AND ABUTTING PARCEL TO EAST)	Discharge reported 6/20/88. Was in state-funded cleanup program (EDI). Received No Further Action/Site Rehabilitation Completion Order (NFA/SRCA) 6/24/10. Shallow soil and groundwater impacted. Deep wells not >state limits. 41 tons of soil removed. 17 tons of concrete removed. One (1) 2,000-gallon leaded gas UST removed 12/12/01. Installed 7/1/75. Lead in groundwater had to be <state cleanup target limit (CTL) for four quarters for NFA to be granted. Conditionally approved 3/11/10 subject to formal abandonment of monitoring wells. Groundwater contamination appeared to extend onto abutting parcel to east and possibly onto the abutting parcel to the west (both "on-site"). Main contaminant lead in water. Shallow groundwater moving to northwest in 2006. Interstate Brands Corporation was a wholly owned subsidiary of Hostess Brands, Inc., with product line of baked goods such as bread, buns, rolls, snack cakes, doughnuts, sweet rolls and similar products. This company filed for Chapter 11 in 2012.
WALGREENS HOLIDAY EDM No. 2	WALGREENS HOLIDAY	US-19 & DARLINGTON RD HOLIDAY, FL 34691	ECHO FRS	W/0.03/158 HIGHER	If included on ECHO and/or FRS, found on a database or applied for National Pollutant Discharge Elimination System (NPDES) permit, etc. Not considered significant/material environmental/contamination concerns.
UNKNOWN SHEEN INCIDENT AT US 19 AND DARLINGTON ROAD BEHIND THE PLAZA. EDM No. 3	UNKNOWN SHEEN INCIDENT AT US 19 AND DARLINGTON ROAD BEHIND THE PLAZA.	HOLIDAY, FL	ERNS	W/0.09/475 LOWER	This "unknown" sheen on the surface of a pond to the west allegedly resulted in a fish and animal kill in 2018. There was no apparent follow-up to this claim or follow-up report on ERNS. This "impacted" area was west and down-gradient to the subject property.
TENORE TOWERS EDM No. 4	TENORE TOWERS	2401 US HWY 19 HOLIDAY, FL 34691	ECHO FRS	W/0.12/634 LOWER	See EDM No. 2.
OIL SPILL (PROGRESS ENERGY) EDM No. 5	OIL SPILL (PROGRESS ENERGY)	2435 US 19 HOLIDAY, FL 34690	ECHO FRS ERNS	W/0.13/686 LOWER	A 5-gallon oil spill in pond occurred at the site of a public utility in 2007. A contractor was hired to address this matter. This impacted area was west and down-gradient to the subject property.
CVS PHARMACY #1328 EDM No. 6	CVS PHARMACY #1328	2513 US HIGHWAY 19 HOLIDAY, FL 34691	ECHO FRS NONTSD	W/0.15/792 LOWER	The pharmacy is a conditionally exempt small quantity generator of hazardous wastes (CESQG) as of 2019 by generator notification (<100 kg/mo). Waste codes can be found in the EDM report under No. 6. The facility was last inspected 9/30/14. At the time, the facility was considered a SQG (<1000 kg/mo).
PEST CONTROL GENERAL STORE EDM No. 7	PEST CONTROL GENERAL STORE	2636 US HWY 19 N HOLIDAY, FL 34691	FRS	NW/0.19/1,003 LOWER	See EDM No. 2.
DAVID MACLENNAN EDM No. 8	DAVID MACLENNAN	4711 AEGEAN AVE HOLIDAY, FL 34690	SLDWST	NE/0.19/1,003 LOWER	This is an inactive waste tire collector of no consequence to the subject property.
SALVATION ARMY-HOLIDAY, FL EDM No. 9	SALVATION ARMY-HOLIDAY, FL	2225 US HIGHWAY 19 HOLIDAY, FL 34691	ECHO FRS	SW/0.19/1,003 LOWER	See EDM No. 2.
CASABLANCA COIN LAUNDRY & DRY CLEAN ALDI #32 HOLIDAY EXPANSION EDM No. 10	CASABLANCA COIN LAUNDRY & DRY CLEAN ALDI #32 HOLIDAY EXPANSION	2643 US HWY 19 HOLIDAY, FL 34691	DRY ECHO FRS NONTSD TANKS	NW/0.21/1,108 LOWER	Not a generator of hazardous wastes by inspections 10/23/00 and 10/26/86. No violations reported. This closed facility was >1,000 feet northwest and down-gradient to the subject property. Not considered a significant/material environmental or contamination concerns.
CAMPING WORLD OF HOLIDAY, FL EDM No. 11	CAMPING WORLD OF HOLIDAY, FL	2132 ARDSLEY LN HOLIDAY, FL 34690	ECHO FRS	NW/0.23/1,214 LOWER	See EDM No. 2.

UST=underground storage tank. TANKS=state storage tank list. LUST=leaking underground storage tank. DRY=dry cleaner. ERNS=Federal spills database. NONTSD=RCRA listing, i.e., hazardous waste generator.

Key Site Representative Interview

AmSkills is in the process of setting up the main training facility. The plan subject to funding will be to expand into other areas of the site. The RV storage is temporary to obtain some cash flow. They are in the final stage of funding and only need a Phase I ESA to submit its package to HUD. LAS was informed that the Pasco County parcel will be deeded over to AmSkills at a future date. Access to the site will ultimately be from Darlington once the RV storage business is closed.

Previous Environmental Reports

A Transaction Screen Process (TSP) report (not a Phase I ESA) dated 11/8/19 was provided LAS by a consultant working with Republic Bank relating to Valdes Family Properties, LLC properties. This TSP did identify any RECs. *Most of the data in the TSP report was acquired by LAS as a matter of course to complete this full Phase I ESA in accordance with ASTM E1527-21.* Handex and ECT did work on the contamination assessment and remediation of the northeast property. Their reports to the state are found in **Appendix E**. Discussion of their results is in **Section 5.7.2**.

Findings, Opinions and Conclusions

See below in **Sections 1.6** through **1.8**. See also **Section 7.0**.

1.6 Findings (“Environmental” Conditions On-Site)¹

1. For a period of time, all of the subject property as configured for this Phase I ESA was cultivated as a citrus grove. It is possible that agricultural chemicals were applied to these groves as a standard procedure. No structure was noted on aerial images that could be considered a potential storage building for these chemicals, nor was an obvious irrigation well which would be a likely mixing area for the chemicals. However, it is unknown when any of the three wells on the subject property were installed and if they were associated with the citrus grove. None of these existing wells appeared to be of large diameter.
2. The northeast and Pasco County parcels were both impacted by a leaking underground storage tank associated with Interstate Brands (Hostess). This was apparently a source of fuel for the bread company’s fleet of delivery trucks. The 2,000-gallon tank (and 41 tons of impacted soil) was removed in 2001 followed by shallow soil and shallow groundwater assessment.
3. A septic tank and drain field are present in the grassy area east of the main building on-site. In the past the building was occupied by a Polish social club and no handling/use of hazardous substances or petroleum products is assumed. It is possible in a commercial/industrial area for these kinds of systems to receive discharges that might contain harmful substances from an environmental standpoint. It is also assumed that Interstate Brands was also connected to a septic tank/drain field system for wastewater disposal. Where its septic tank/drain field system was located is unknown.
4. Three (3) electric water wells were observed on the subject property. The site is not connected to municipal sources of potable water (or sanitary sewer) although apparently available along US Highway 19 and in residential communities to the north and east.
5. An underground grease trap is at the southeast corner of the building.
6. The remaining permanent building on the subject property was constructed in 1973 at a time in which asbestos containing materials (ACM) were still used in construction. These materials were ultimately phased out due to EPA bans in the ensuing years. It is possible that this building contains some of these materials which if friable could be an indoor air quality threat.
7. Some facilities were identified along US Highway 19 and Julie Lane to the west on regulatory and city street directory listings that would appear to have the potential of adversely impacting the

¹ These can include *recognized environmental conditions (RECs)* (see **Footnote No. 2**). **Section 1.7** discusses LAS’ reasoning for considering or not considering a particular environmental condition a “recognized environmental condition.”

subject property as configured for this assessment by the apparent nature of their operations (auto repair, auto body repair, printing, engraving, etc.).

1.7 Opinions (correspond to above numbers)

1. While the property was devoted to citrus during at least the 1960s and 1970s, it is not possible to conclude that agricultural chemicals were stored and/or mixed on the site. Other groves were present in the area, specifically north of the property across Darlington Road that could have been owned by the same party. It is possible that storage facilities were on adjacent groves and chemical mixing was off-site. It is also important to note that the property was developed after the citrus trees were removed. In our experience, buildings and pavement subsequently added would serve to mitigate residual chemical concentrations that might have been present. In our opinion, this past site usage is not a **Recognized Environmental Condition (REC)**.² If any impacts do remain, in our opinion they would be “*de minimis*” in nature.
2. Regarding the former fuel UST location, after contamination assessment, some remediation in the form of contaminated soil removal, shallow groundwater monitoring, and consideration by the Florida Department of Environmental Protection (FDEP), the site owners received a No Further Action/Site Rehabilitation Completion Order in 2010. Based on the assessment tasks performed at the time, the decision of the Department, and our past experience with similar systems, in our opinion, no further assessment is warranted in this area at this time. **Accordingly, based on ASTM E1527–21, this finding can be considered an Historic REC (HREC)**³.
3. The main facility on the subject property as configured for this assessment is served by a septic tank and drain field for wastewater disposal. In past years, a social club occupied this building, and it is assumed that occupants did not utilize hazardous substances or petroleum products. As for activities occurring while Interstate Brands was on-site, the nature of that business appeared to be warehousing and distribution. It is unlikely that significant hazardous substances or petroleum products were utilized in conjunction with Interstate’s operation. **In our opinion, environmental/contamination risks associated with septic tank/drain field systems previously or presently on the subject property are not RECs at this site.** If any impacts do remain or are present, in our opinion they would be “*de minimis*” in nature.
4. **In our opinion, this finding is not a REC.** If any or all of these wells are not utilized in the future, they should be properly abandoned in accordance with water district rules by a Florida-licensed water well contractor. It is possible for these wells to be converted to irrigation wells in the future if the property is connected to a municipal source of potable water.
5. This grease trap should be checked and drained if necessary. **This is only a potential health concern and is not in our opinion a REC.**
6. Based on our site reconnaissance, the main building appears to have been significantly “gutted” for conversion to a training facility. It is also primarily of metal construction. In our opinion, it is unlikely that ACM still remain in the building sufficient enough to cause any material environmental harm. **In our opinion, this finding is not a REC; however, see Section 8.1.**
7. Based on our review of the physical setting of the site, it is likely that the subject property is hydraulically up-gradient to the facilities located on Julie Lane and US Highway 19 to the west. It also did not appear that these operations were expansive enough and/or handled quantities of materials that would be prone to be significantly harmful to the environment or to migrate in

² The term *recognized environmental condition* means (1) the presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* due to a *release* to the *environment*; (2) the likely presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* due to a *release* or likely *release* to the *environment*; or (3) the presence of *hazardous substances* or *petroleum products* in, on, or at the *subject property* under conditions that pose a *material threat* of a future *release* to the *environment*. A *de minimis condition* is not by definition a *recognized environmental condition*.

³ A previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations). A *historical recognized environmental condition* is not a *recognized environmental condition*.

groundwater, except possibly the printing and engraving operations. **Based on these factors, it is our opinion that activities on adjoining properties to the west do not pose a material/realistic/imminent environmental/contamination threat to the subject property as configured for this assessment and are not by definition RECs.**

Business Environmental Risks

In carefully considering *business environmental risks (BER)* associated with this property, either explicitly mentioned herein, or others not specifically mentioned in this report, it is the client/user's responsibility to do so in the context of its intentions and objectives for the site, risk posture, legal issues, lender requirements, future plans, and/or any number of other economic and financial considerations.

1.8 Conclusions (also refer to Section 1.7)

Land Assessment Services, Inc. (LAS) has performed a Phase I Environmental Site Assessment (Phase I ESA) of the **AmSkills Site**, located at 4606 Darlington Road, in Holiday, Pasco County, Florida, in general conformance with the scope of work and limitations of ASTM E1527-21.

This assessment has revealed no evidence of RECs, controlled RECs, or historical RECs, in connection with the subject property as configured for this assessment, except the HREC relating to the former UST on the “northeast” parcel and/or the Pasco County parcel (Parcel Nos. 30-26-16-0010-03800-0030 and 30-26-16-0010-03800-0031, respectively). In our opinion, additional testing is not warranted in this area at this time based on FDEP file data, the facility's NFA status, and the SRCO.

See **Section 8.1** for Non-ASTM Scope considerations, including a discussion on ACM.

In our opinion, there were no material data gaps/failures encountered in completing this Phase I ESA.

1.9 Summary—Conditions for Use

The users of this report should understand that this summary ***does not contain all the information that is found in the full report*** and the ***body of the report may not contain information/data mentioned in the summary***. The report should be carefully read ***in its entirety, including footnotes***, to obtain a more complete understanding of LAS' reasoning and/or the supporting information provided, to aid in any decisions made, or actions taken regarding the subject property based on this information and the conclusions derived therefrom. ***Critical issues, however, have been brought forward regarding RECs and significant data gaps.***

2.0 INTRODUCTION

This report is intended exclusively and solely for the use and benefit of AmSkills, Inc. and HUD, subject to the terms, conditions and limitations found herein and the scope of services and cost proposal dated 11/16/22, which was accepted by email on 11/25/22. Therefore, its contents should not be relied upon by any other parties without the express prior written consent of LAS and its client. In no event and under no circumstances will LAS have any duty or obligation, or liability to any third party.

2.1 Purpose and Scope of Standard of Practice ASTM E1527-21 and a Phase I ESA (see Appendix A)

The purpose of this *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation: E1527-21* is to define good commercial and customary practice in the United States of America for conducting an *environmental site assessment*⁴ of a parcel of *commercial real estate* with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. § 9601) and *petroleum products*.⁵ As such, this practice is intended to permit a *user* to satisfy one of the requirements to qualify for the *innocent landowner, contiguous property owner, or bona fide prospective purchaser* limitations on CERCLA liability (hereinafter, the “*landowner liability protections*,” or “*LLPs*”); that is, the practice that constitutes *all appropriate inquiries* into the previous ownership and uses of the *property* consistent with good commercial and customary standards and practices as defined at 42 U.S.C. § 9601(35)(B).

It is important to note that there may be other environmental issues or conditions at a property that parties may wish to assess in connection with commercial real estate that are outside the scope of this practice (non-scope considerations). These may include the presence of substances in quantities and under conditions that may lead to contamination of the property or of nearby properties but are not included as “hazardous substances” under 42 USC § 9601(14). Additionally, an evaluation of *business environmental risk (BER)* associated with a parcel of *commercial real estate* may necessitate investigation beyond that identified in this practice **E1527-21**.

“Non-scope” considerations that the user might elect to address as an “additional issue outside standard practices” include, but are not limited to, “controlled” substances, unless the property is a EPA Brownfields Assessment and Characterization Grant, asbestos containing building materials; radon gas (indoor and/or in the soils); indoor air quality (including vapor intrusion, but not to be confused with the potential for vapor migration); wetlands; industrial hygiene; regulatory compliance; ecological resources; high voltage power lines; health and safety; endangered species; cultural and historic resources; lead in drinking water; lead-based paint; biological agents; mold; or soil, groundwater, sediment, soil vapor, and/or surface water contamination/testing.

It is important to note that by stating the “additional issues” listed above, no implication is intended whatsoever as to the relative importance of inquiry into such considerations, and no such inquiries are necessary to complete the Phase I ESA in accordance with ASTM E 1527-21.

Additionally, this practice does not address whether requirements in addition to *all appropriate inquiries* have been met to qualify for the *LLPs*, including the continuing obligation not to impede the integrity and effectiveness of *activity and use limitations [AULs]*, or the duty to take reasonable steps to prevent *releases*, or the duty to comply with legally required *release* reporting obligations. Further, this practice does not address requirements of any state or local laws or of any federal laws other than the *all appropriate inquiries* provisions of the *LLPs* alluded to herein. *Users* are cautioned that federal, state, and local laws may impose environmental assessment obligations that are beyond the scope of this practice. *Users* should also be aware that there are likely to be other legal obligations regarding *hazardous substances* or *petroleum products* discovered in, on, or at the *subject property* that are not addressed in this practice and that may pose risks of civil and/or criminal sanctions for noncompliance. The EPA is also studying other environmental threats that may result in the generation of new rules after its approval of E1527-21 creating legal obligations related to the subject property. Obviously, this practice does not address future requirements.

LAS has only included, i.e., restated, some portions of ASTM E1527-21 for clarification purposes only. See **Appendix A** for a glossary of terms and common acronyms.

⁴ See **Appendix A** for ASTM Standard of Practice E1527-21 “terminology.”

⁵ Petroleum products are included within the scope of this practice because they are of concern with respect to many parcels of commercial real estate and current custom and usage is to include an inquiry into the presence of petroleum products when doing an environmental site assessment of commercial real estate. Inclusion of petroleum products within the scope of this practice is not based upon the applicability, if any, of CERCLA to petroleum products.

2.2 Phase I ESA Process, Procedures and Methodologies

The process, procedures, terminology and methodologies for this Phase I ESA were generally consistent with those set forth in *ASTM E1527-21*. However, it should be noted that no environmental site assessment can wholly eliminate uncertainty regarding the potential for *recognized environmental conditions* (RECs)⁶ in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and the practice recognizes reasonable limits of time and cost. Further, all appropriate inquiry does not mean an exhaustive assessment of a “clean” property. There is a point at which the cost of information obtained, or the time required to gather it outweighs the usefulness of the information and, in fact, may be a material detriment to the orderly completion of transactions. One of the purposes of ASTM E1527-21 is to identify a balance between the competing goals of limiting the costs and time demands inherent in performing an environmental site assessment and the reduction of uncertainty about unknown conditions resulting from additional information.

2.3 General Phase I ESA Limitations

2.3.1 Natural Limitations

It is important to note that all but an exhaustive investigation might fail to locate buried, covered over or localized surficial events of hazardous substances or petroleum products on-site that are not reasonably visible or suspected at the ground surface. The client should realize that areas on the subject site, which in our opinion, did not show visual evidence of hazardous substances or petroleum products at the ground surface level at the time of our field work, except as may be qualified herein, could later become contaminated due to natural phenomena, human intervention, or on-site or adjacent site impacts. These possibilities are beyond our control.

2.3.2 Guarantees

Parties relying on this assessment should understand that our failure to identify evidence indicative of RECs related to hazardous substances or petroleum products because of completing the ASTM E1527-21 standard of work does not guarantee that such conditions do not exist on-site in a localized, covered over or buried event somewhere on the property.

2.3.3 Comprehensiveness

This report is not a comprehensive site characterization and should not be construed as such. The opinions presented in this report are based on findings derived from completing the ASTM E1527-21 standard of work. While LAS may not have found indicators that suggest hazardous substances or petroleum products exist at the site at levels likely to warrant further assessment or mitigation and as such are considered RECs, not finding such indicators does not mean that hazardous substances or petroleum products do not exist at the site. It should also be clearly understood that no matter how much research is accomplished during the “Phase I” process, **the only way to know about the actual composition and condition of the subsurface areas of the property is through soil and/or groundwater testing and/or excavation.**

2.3.4 Safety Concerns

This standard does not purport to address all the safety concerns, if any, associated with its use. It is the responsibility of the user of this standard to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to use.

2.3.5 Standard of Care

This practice offers a set of instructions for performing one or more specific operations. This document cannot replace education or experience and should be used in conjunction with professional judgment. Not all aspects of this practice may be applicable in all circumstances. This ASTM standard is not intended to represent or replace the standard of care by which the adequacy of a given professional service must be judged, nor should this document be applied without consideration of a project’s many unique aspects. The word “Standard” in the title means only that the document has been approved through the ASTM consensus process.

⁶ The goal of the processes established by this practice is to identify *recognized environmental conditions*.

2.4 User Responsibilities

2.4.1 Scope

The purpose of this section is to describe tasks to be performed by the *user*. The “*All Appropriate Inquiries*” Final Rule (40 C.F.R. Part 312) requires that these tasks be performed by or on behalf of a party seeking to qualify for an *LLP* to CERCLA liability. These tasks must also be completed by or on behalf of EPA Brownfield Assessment and Characterization grantees. **While such information is not required to be provided to the *environmental professional*, the *environmental professional* shall request that the *user* provide the results of these tasks as such information can assist the *environmental professional* in identifying *recognized environmental conditions*.** See Section 3.0 for more information regarding the optional *User Questionnaire* to assist the *user* and the *environmental professional* in gathering information from the *user* that may be material to identifying *recognized environmental conditions*. If the *user* does not communicate the information to the *environmental professional*, the *environmental professional* should consider the significance of the absence of such information pursuant in terms of a “data gap.”

2.4.2 Review Title and Judicial Records for Environmental Liens or Activity and Use Limitations (AULs)

To meet the requirements of 40 C.F.R. 312.20 and 312.25, a search for the existence of *environmental liens* and *AULs* that are filed or recorded against the *subject property* must be conducted. To meet this requirement, ***users*** may rely on either of the following two methods:

Method 1 Transaction-Related Title Insurance Documentation Such as Preliminary Title Reports and Title Commitments—The *user* may rely on title insurance documentation, commonly fashioned as preliminary title reports or title commitments, which are prepared while offering title insurance for the *subject property* transaction to identify *environmental liens* or *AULs* filed or recorded against the *subject property*. Title insurance documentation involves a reliable review of *land title records* or judicial records. However, the *user* (or a title professional engaged by the *user*) should closely review the title insurance documentation, particularly the areas of the documentation listing *subject property* encumbrances or “restrictions on record,” for indications of *AULs* or *environmental liens*.

Method 2 Title Search Information Reports Such as Condition of Title, Title Abstracts, and AUL/Environmental Lien Reports—Alternatively, *users* may rely on title search information reports to identify *environmental liens* or *AULs* filed or recorded against the *subject property*. Title search information reports, commonly fashioned as Condition of Title, Title Abstract, *AUL/Environmental Lien*, or similarly titled reports, provide the results of *land title record* and/or judicial records research (as applicable) for information purposes only, rather than for the purposes of offering title insurance. *Users* may rely on title search information reports if the title search information reports meet the following scope:

Scope of Title Search Information Reports—Title search information reports shall identify environmental covenants, environmental easements, land use covenant and agreements, declaration of environmental land use restrictions, environmental land use controls, environmental use controls, *environmental liens*, or any other recorded instrument that restricts, affects, or encumbers the title to the *subject property* due to restrictions or encumbrances associated with the presence of *hazardous substances* or *petroleum products*. Title search information reports shall review *land title records* for documents recorded between 1980 and the present. If judicial records are not reviewed, the title search information report shall include a statement providing that the law or custom in the jurisdiction at issue does not require a search for judicial records to identify *environmental liens*.

Role of the Environmental Professional—The *user*’s responsibility to search for *environmental liens* and *AULs* required by this section is in addition to the *environmental professional*’s search of *institutional control* and *engineering control* registries described in the E1527-21 standard of practice. **Unless this task is expressly added by a change in the scope of work to be performed by the *environmental professional*, the *user* requirements set forth in E1527-21 standard of practice do not impose on the *environmental professional* the responsibility to undertake a review of *land title records* or judicial records for *environmental liens* or *AULs*.**

User Responsibility to Report Environmental Liens and AULs to the Environmental Professional—Any *environmental liens* or *AULs* identified under the requirements of the E1527-21 standard of practice, or otherwise known to the *user*, should be reported to the *environmental professional* conducting the *environmental site assessment*. As set forth in the E1527-21 standard of practice, the *environmental professional* shall request that the *user* provide the results of *user* performed *AUL* and *environmental lien* searches performed under the E1527-21 standard of practice.

Environmental Professional Report Requirements—*Environmental professionals* shall describe in their *report* whether they received the results of the *environmental lien* and *AUL* search required by the E1527-21 standard of practice. The *environmental professional* does not need to review, assess, or otherwise evaluate the *land title records* or the *user's* conclusions as to whether *AULs* or *environmental liens* were identified. The *environmental professional* only needs to identify whether they received *land title records* from the *user* and whether the *user* identified *AULs* or *environmental liens*.

2.4.2.1 Reasonably Ascertainable Title and Judicial Records for Environmental Liens and Activity and Use Limitations

Environmental liens and *AULs* that are recorded or filed in any place other than *land title records* or judicial records (as applicable) are not considered to be *reasonably ascertainable* unless applicable federal, tribal, state, or local statutes or regulations specify a place other than *land title records* or judicial records (as applicable) for recording or filing of *environmental liens* and *AULs*.

2.4.3 Specialized Knowledge or Experience of the User

Users must consider their specialized knowledge to identify conditions indicative of *releases* or threatened *re-leases*. If the *user* has any specialized knowledge or experience that is material to *recognized environmental conditions* in connection with the *subject property*, the *user* should communicate any information based on such specialized knowledge or experience to the *environmental professional*. The *user* should do so before the *site reconnaissance* is conducted.

2.4.4 Actual Knowledge of the User

If the *user* has *actual knowledge* of any *environmental lien* or *AULs* encumbering the *subject property* or in connection with the *subject property*, the *user* should communicate such information to the *environmental professional*. The *user* should do so before the *site reconnaissance* is conducted.

2.4.5 Reason for Significantly Lower Purchase Price

In a transaction involving the purchase of a parcel of *commercial real estate*, the *user* shall consider the relationship of the purchase price of the *subject property* to the fair market value of the *subject property* if the *subject property* was not affected by *hazardous substances* or *petroleum products*. The *user* should try to identify an explanation for a lower price which does not reasonably reflect fair market value if the *subject property* was not contaminated, and make a written record of such explanation. Among the factors to consider will be the information that becomes known to the *user* pursuant to the *Phase I Environmental Site Assessment*. This practice does not require that a real estate appraisal be obtained to ascertain fair market value of the *subject property*. The *user* should inform the *environmental professional* if the *user* believes that the purchase price of the *subject property* is lower than the fair market value due to contamination. The *user* is not required to disclose the purchase price to the *environmental professional*.

2.4.6 Commonly Known or Reasonably Ascertainable Information

Commonly known or reasonably ascertainable information within the local community about the *subject property* must be considered by the *user*. If the *user* is aware of any commonly known or *reasonably ascertainable* information within the local community about the *subject property* that is material to *recognized environmental conditions* in connection with the *subject property*, the *user* should communicate such information to the *environmental professional*. The *user* should do so before the *site reconnaissance* is conducted. The *user* must gather such information to the extent necessary to identify conditions indicative of *releases* or threatened *releases* of *hazardous substances* or *petroleum products*.

2.4.7 Degree of Obviousness

The *user* must consider the degree of obviousness of the presence or likely presence of *releases* or threatened *releases* at the *subject property* and the ability to detect *releases* or threatened *releases* by appropriate investigation including the information collected under the E1527-21 standard of practice.

2.4.8 Other

Either the *user* shall make known to the *environmental professional* the reason why the *user* wants to have the *Phase I Environmental Site Assessment* performed or, if the *user* does not identify the purpose of the *Phase I Environmental Site Assessment*, the *environmental professional* shall assume the purpose is to qualify for an *LLP* to CERCLA liability and state this in the *report*.

3.0 USER PROVIDED INFORMATION (EXPLAINED IN SECTION 2.4)

User Questionnaire was not returned completed. See Appendix G⁷ for Client/User Communications.

3.1 Review Title and Judicial Records for Environmental Liens or Activity and Use Limitations (AULs)

A current title search was not provided by the client for review of matters of public record, e.g., environmental liens.

3.2 Specialized Knowledge or Experience of the User

The client/user owns the subject property except for the Pasco County Parcel.

3.3 Actual Knowledge of the User

The client/user owns the subject property except for the Pasco County Parcel.

3.4 Reason for Significantly Lower Purchase Price

The client/user did not report or provide to LAS an explanation of any reduction in the property's value due to contamination.

3.5 Commonly Known or Reasonably Ascertainable Information

LAS conducted inquiries with knowledgeable parties or possessed research about the subject area. See **Section 6.0**. *However, if information in provided reports or from other reasonably ascertainable sources was sufficient, interviews were not conducted or were limited to the site owner representative.*

3.6 Degree of Obviousness

The client/user was unaware of prior uses of the site (beyond the obvious) that might result in a release as defined in E1527-21 and did not know how to interpret present site conditions.

3.7 Reasons for the Phase I ESA

The client/user is pursuing HUD financing.

3.8 User Provided Environmental Reports

A Transaction Screen Process (TSP) report (not a Phase I ESA) dated 11/8/19 was provided to LAS by a consultant working with Republic Bank relating to Valdes Family Properties, LLC properties. This TSP did identify any RECs. *Most of the data in the TSP report was acquired as a matter of course to complete this full Phase I ESA in accordance with ASTM E1527-21.*

⁷ LAS provided the *User* of this report with a *User Questionnaire* prior to the project's commencement to address the "user provided information" requirements set forth in the E1527-21 standard of practice, i.e., **Section 2.4**. If the *User Questionnaire* was submitted/completed by the *User*, information contained therein has been summarized in **Section 3.0**. If the *User Questionnaire* was not returned completed to LAS, it is possible that LAS has learned of information addressed in **Section 2.4** through verbal interactions with the *User* or has common knowledge of the subject property and/or its vicinity. To the extent that information on the subject property addressed in the *User Questionnaire*, has been verbally communicated to LAS prior to commencement, and/or is common knowledge to LAS, such information is summarized in **Section 3.0**.

4.0 SITE RECONNAISSANCE

4.1 Site Name

AmSkills Site (4.35 ± Acres and 0.1± Acre Pasco Co. Parcel)

4.2 Site Location

4606 Darlington Avenue (for all addresses see below)
Holiday, Pasco County, Florida

Section

Section 30 of Township 26S, Range 16E

Pasco County Parcel Numbers (from Pasco County Property Appraiser)

<u>Parcel Number</u>	<u>Acres</u>	<u>Owner</u>	<u>Addresses</u>
30-26-16-0010-03800-0010	3.26	AmSkills, Inc.	4606
30-26-16-0010-03800-0030	0.77	AmSkills, Inc.	4620, 4622, 4624, 4626, 4628, 4630, 4632
30-26-16-0010-03800-0040	0.32	AmSkills, Inc	None listed
30-26-16-0010-03800-0031	0.10	Pasco County	None listed

For **Site (Vicinity) Map**, see **Figure 1**, on following page.

4.3 Inspection Date

A representative for LAS (EP) visited the subject property on the afternoon of 11/30/22 from 1:30-2:30 pm. Weather was partly cloudy and 81° F. Off-site reconnaissance was performed from 12:30-1:30 pm.

4.4 Site Inspector

Richard C. Reynolds, EP, President (11/30/22)

4.5 Site Representative(s) Present

Tom Mudano, President, and Tyler Mudano, AmSkills, Inc.

4.6 Inspection Process and Procedures

LAS was given unfettered access to the building and the site. A walking introductory tour was conducted with Tom Mudano.

All observations below were made on the date of LAS' site visit. LAS is not responsible to report changes in site conditions in the intervening period between our site visit and report issue date.

4.7 Surface Access and Egress

The site was available from a private road abutting west of the site and from Darlington Road north of the property. The RV storage area was entered through a gate north of the main building.

4.8 Narrative Description of Current Improvements and Site Uses

See **Site Photographs** in **Appendix F**.

The main structure was on the south side of the subject property. It was the former location of the Polish American Club which had been adapted for use as the AmSkills training facility. The building was primarily constructed out of steel but had a stone façade and an aluminum canopy on its west side covering a decorative entranceway. In the asphalt pavement on the west side of this building were number of cuts most of which were for electrical connections. Also, on the west side of this building was a chain-link/barbed wire enclosure at its southwest corner which was empty. On the north side of the steel building were two (2) chain-link/barbed wire enclosures at each corner. The northwest enclosure had empty yellow metal lockers for future use in storing hazardous/flammable materials. In between these two fence enclosures were stockpiles of concrete forms. The northeast enclosure was empty. On the north side was one rolling door. North of the building was a steel table, empty 55-gallon plastic drum, and an empty 100-gallon plastic water tank. A septic tank and drain field were located in the grassy area on the east side of the building. Also, in this area were a closed storage trailer, pole-mounted electrical transformers, a trailer, a collection of paint cans on a cart (heat wrapped), and an electric-powered water well. Off the southeast corner was a fenced enclosure that was formally the area we believe where natural gas storage was present in addition to a possible cooking grease vat. There were, however, two manhole covers that indicated there was an underground grease trap off the southeast corner.

Inside the structure the occupants were in the process of setting up a training facility with computer-controlled machines, punch presses, and other kinds of machines, most of which were either heat wrapped or in wood cases. At the entrance to the building on its west side were number of rolling

lockers and toolboxes. Also noted in the training area were tables, computers on a pallet, and rolling plastic garbage cans. A battery-powered forklift was observed.

Further west of the training facility was an office trailer out of which AmSkills employees currently work, storage trailer, and dumpster. At the entrance into the facility off the unnamed road to the west (Valdes property) was another electric powered water well/pump. In the asphalt pavement around the main structure, we noted some underground storm water drains.

In the northwest section of the property within a chain-link fence were parked a number of RVs, boats, and trailers as well as an electric powered water well in the southeast corner of this section. This area is rented out by the public for storage of large items. On the south side of the chain-link fence enclosure were number of vehicles belonging to the employees.

The northeast parcel of the subject property was an undulating grassy area with some large trees and cacti in its southeast corner. Two areas of pavement, one off Darlington Road and the other further south enclosed an elevated grassy area that appeared to have been at one time the foundation of a former building. Two metal posts were off the road which formally held the business' road sign. On the west side of this tract was a narrow rectangular parcel; an apparent abandoned road. The client indicated that this strip of land will be given to AmSkills as part of the transaction or at some future date. In this strip, LAS noted number of small and large groundwater monitoring (test) wells. This was the former location of a 2,000-gallon underground storage tank (UST) for leaded gas.

AmSkills provided MSDS sheets (see **Appendix E** for links) indicating the following potentially "hazardous" materials and petroleum products used on-site. LAS viewed the presence of none of these materials as "actionable" in terms of actual or intended uses and/or quantities/volumes kept on hand. *It is assumed that these materials will be properly stored once the facility is set up and that any waste products will be properly collected and disposed.*

Lithium Grease	Diesel Exhaust Fluid
Hydraulic Oil	Gasoline/Diesel Fuels
SAE 15/40W	Paint (Latex) (Industrial Enamel)
Metal Working Fluid	Adhesive

For a **Site Plan**, see **Figure 2**, on the following page.

4.9 AST/UST Systems

Not physically or visually observed.

4.10 Transformers and PCB Equipment

Pole-mounted on south side of Darlington Road and along east border of the site. Underground cable and gas in ROW north of site. (See Site Photographs, **Appendix B**)

4.11 Hazardous Substances and Petroleum Products

No material hazardous substances and petroleum products physically or visually observed.

4.12 Drums and Storage Containers

Not physically or visually observed.

4.13 Additional Site Observations (from general categories in ASTM E1527-21)

<i>Site Vegetation</i>	Grass, weeds, oaks, cacti.
<i>Surface Water</i>	Not physically or visually observed.
<i>Drainage</i>	Underground to retention area in off-site land to south.
<i>Railroad Spurs</i>	Not physically or visually observed.
<i>Utilities, Drains, Vent Pipes, Water Wells, Heating and A/C Systems, Septic Systems</i>	Three (3) water wells. Septic tank and drain field east of main building. Possible septic tank and drain field on the northeast parcel.
<i>Building(s)</i>	See Section 4.8 .
<i>Heavy Equipment, Tankers or Spray Rigs</i>	One (1) battery powered lift truck.
<i>Unusual Odors</i>	Not detected.
<i>Disturbed Soils</i>	Not physically or visually observed.
<i>Surface Impoundments or Holding Ponds</i>	Not physically or visually observed.
<i>Air Emissions or Used Water Discharges</i>	Not physically or visually observed.
<i>Industrial or Manufacturing Activities</i>	Not physically or visually observed.
<i>Monitoring Wells or Remedial Activities</i>	In northeast area of the site, primarily on the Pasco County parcel. Numerous groundwater monitoring well covers, large and small (these wells were reportedly abandoned, i.e., filled with grout)
<i>Stained or Discolored Soil</i>	Not physically or visually observed.
<i>Leachate or Seeps</i>	Not physically or visually observed.
<i>Stressed Vegetation</i>	Not physically or visually observed.
<i>Chemical Spills or Releases</i>	Not physically or visually observed.
<i>Groundwater or Surface Water Contamination</i>	No chemical testing of groundwater was conducted for this Phase I ESA.
<i>Oil or Gas Well Exploration</i>	Not physically or visually observed or suspected.
<i>Farm Used Concerns</i>	Not physically or visually observed.
<i>Evidence of Prolonged Use or Misapplication of Pesticides, Herbicides, or Fertilizers</i>	Not physically or visually observed.
<i>Other environmentally suspicious observations.</i>	There is an underground grease trap at the southeast corner of the subject building. It is unknown when this trap was last evacuated.
<i>Discharges, Leachate, Migration, or Run-off from Off-Site Pollution Sources</i>	Not physically or visually observed.

4.14 Area Reconnaissance

4.14.1 Description and Contamination Potential of Adjoining Properties

North—Darlington Road, single family residential (Orangewood Village), water pump station (Sunshine Water Services Company—30-26-16-0110-00000-4240)

South—Property owned by Valdes Family Properties, LLC (Florida Diamond Center, parking—30-26-16-0010-03800-0000) and Pasco Storage Inc. (storage, retention area for subject site—30-26-16-0010-03800-0050)

East—Internal Medicine practice (Jeffrey M. Davis MD, 4642 Darlington Road—30-26-16-0010-03700-0010) and single-family homes (Orangewood Village) west and east of Grandin Street.

West—Properties owned by Valdes Family Properties, LLC , including private road (primary access to subject property at time of site reconnaissance—30-26-16-0010-03800-0020), properties south to north owned by United Dean Properties, LLC (Doctor's Urgent Care—30-26-16-0010-03900-0090), GTE Florida, Inc. (Frontier—30-26-16-0010-03900-0071), Christopher F. Rennert, Inc. (used car dealer, office/warehouse—30-26-16-0010-03900-0061), and Holiday Florida Investment Properties, LLC (Walgreen Co.—30-26-16-0010-03900-0010), Julie Lane, Anthony & Mary Ann Saravanos (OnPoint Fashions—30-25-16-0010-03900-0070), Judy's Natural Foods, Inc. (restaurant—30-26-16-0010-03900-0060), Nick Leone & Mildred A Leone Trust (Goodyear, auto repair—30-26-16-0010-03900-0040), US Highway 19.

4.14.2 Summary and Discussion

No obvious material environmental/contamination threats were observed on adjoining properties.

4.14.3 Vapor Encroachment

LAS refers to guidance found in ASTM E2600-15 to address **on a cursory basis only** whether a Vapor Encroachment Screen (VES) is warranted to further assess the subject property for “vapor encroachment potential” from actual or perceived pollution sources on-site or on adjoining lands.

It is important to note that this Phase I ESA does not contain a VES nor is it required to. The objective of our cursory review is simply to conclude whether a VES should be conducted as a separate environmental study in addition to or to complement the Phase I ESA.

To create a “default list” of potential “Vapor Encroachment” sources for initial review, LAS generally used the environmental data acquired for the Phase I ESA (see **Section 5.7.2**) and applied the criteria set forth in ASTM E2600-15, e.g., chemicals of concern (COC) or petroleum product COC on the **subject property**, COC reported on listed facilities **within 1,742 ± feet of the subject property**, or petroleum product COC reported on listed facilities **within 528 ± feet of the subject property**. This study area is called the default *area of concern* (AOC) per ASTM E2600-15. *The default AOC may be expanded or reduced by the environmental professional (adjusted AOC) using experience or his or her professional judgment. Consideration may be given, for example, to groundwater flow direction, subsurface characteristics, surficial features and man-made features.*

It is important to note that suspected or confirmed contamination in the soils and/or groundwater of the subject property or adjoining properties based on previous environmental studies or assessments conducted by others or regulatory agencies may provide sufficient evidence alone of the potential for vapor intrusion on or impacting a particular site without performing a VES. Previous environmental studies in the northeast section (Interstate Brands) indicated no material potential for soil vapor intrusion in that area. There were no other on-site or adjoining site impacts that might threaten the site in our professional judgment.

5.0 RECORDS REVIEW

5.1 Physical Setting Sources

5.1.1 Site Topography

LAS reviewed the “Elfers, Fla.” USGS 7.5-minute topographic map (28082-B6 Drawn 1974-Photo-revised 1987). The area was relatively flat. A 15’ contour was drawn in the southwest section of the subject property. 10’ contour lines were off the southwest corner of the site and north of the housing subdivision to the north.

5.1.2 Designated Wetlands

The scope of work for this Phase I ESA did not include a formal wetland delineation. The NWI Wetlands Map (see **Appendix C**) did not indicate the presence of wetlands on-site. A significant wetland system was once southwest of the site, which was subsequently partially reworked into retention ponds to allow for development.

5.1.3 Geotechnical Soils Investigation Reports

See previous environmental testing reports in **Appendix E**. No specific geotechnical engineering study was provided to LAS.

5.1.4 General Stratigraphy

The site lies on the western edge of the Gulf Coastal Lowlands region of west central Florida (White, 1970 and Puri and Vernon 1964). Various depositional environments over time have led to a complex stratigraphic sequence in the general region of sands, clays, shell beds, limestone, sandstones, and dolomite. The ages of these sediments range from Pliocene to recent. Generally, the region has not undergone deformation and sediments reflect conditions at the time of deposition. Free of deformation, the region’s stratigraphic elements increase in age with depth. In and around the subject property, shallow sediments are primarily undifferentiated sands, clays and shell beds extending upwards of 30-40’ below land surface (bls). Underlying the surficial sediments is the Tampa Member of the Arcadia Formation, a carbonate unit of the Hawthorne Formation that extends from 30-40’ bls to approximately 120’ bls. In this area this carbonate unit is the beginning of the Upper Floridan Aquifer System. Underlying the Tampa Member of the Arcadia Formation is a limestone sequence from the Suwannee, Ocala and Avon Park Formations that are encountered with depth. In the area around the subject property Suwannee Limestone has a thickness of approximately 200’, Ocala Limestone has a thickness of approximately 150’ and the Avon Park Formation extends down to a depth of at least 500-700’ bls. See **Appendix C**.

5.1.5 Shallow Soil Survey

The USDA Soil Survey for Pasco County indicated two (2) primary soil type for the subject site:

15-Tavares-Urban land complex, 0 to 5 percent slopes. *This map unit consists of areas of Urban land and nearly level to gently sloping, moderately well drained Tavares soils on low ridges. Tavares soils make up 45 to 65 percent of the map unit, and Urban land makes up from 30 to 45 percent. The areas of Tavares soils and Urban land are so intricately mixed, or so small, that it is not practical to separate them in mapping at the scale used.*

38-Urban land. *In this miscellaneous area, the original soil has been modified through cutting, grading, filling, and shaping for urban development. Major soil properties that originally limited urban uses have been overcome in an acceptable manner. Urban facilities such as paved parking areas, streets, industrial buildings, houses, shopping centers, and underground utilities have been constructed on 75 percent or more of the mapped area. In the places not covered by urban facilities, the soils generally have been so altered that identification is not feasible.*

See **Appendix C** for the specific soil map for the property.

5.1.6 Area Hydrologic/Hydrogeologic Maps Charts

The subject site is in the Southwest Florida Water Management District (SWFWMD). For regional hydrogeologic information, see “*Hydrogeologic Framework of the Southwest Florida Water Management District*,” in **Appendix C** (Florida Geological Survey, Bulletin No. 68, 2008; Plate 11, Cross Section H-H’, W-16609).

5.1.7 Primary and Secondary Aquifers

According to SWFWMD maps and other hydrogeological information, two (2) aquifer systems are present in the study area: the surficial aquifer system and the Upper Floridan aquifer system.

5.1.8 On-site Water Wells

Three (3) water wells were observed on-site. EDM/ SWFWMD did not report a permitted water well on the subject site, however. It is important to note that EDM Public Water Well No. 1, Orangewood Water System, 4627 Darlington Road (adjacent north of the subject site and the former UST location on the northeast parcel), was sampled/tested 8/29/11 for solvents and volatile organic compounds (VOC’s), but *all levels were reported under laboratory method detection levels*. See **Figure 2** and **Appendix E**.

5.1.9 Groundwater Depth

The scope of services for this Phase I ESA did not include measurement of the shallow groundwater depth. However, soil testing in 2006 in the UST location had the shallow groundwater table at $8 \pm$ feet below land surface (Handex Supplemental Site Assessment Report, 4/17/06). See **Appendix E**.

5.1.10 Groundwater Flow

Based on available potentiometric and topographic maps, the predicted groundwater flow direction in the Floridan aquifer system is generally to the **west** in the study area. The predicted groundwater flow direction for the surficial aquifer system within the study area, was not determinable without site-specific groundwater elevation measurements. *However, the Handex assessment in 2006 (on-site) indicated shallow groundwater moving to the **northwest**.* See **Appendix C** and **Appendix E**.

5.2 Review of Aerial Photographs

5.2.1 Summary of Selected Historical Aerial Photographs (from EDM and Google Earth)⁸

1942—The area is generally rangeland with the site partially wooded and vacant. An east-west dirt road abuts to the north, possibly the beginnings of Darlington Road. There is a north-south trail further east. Wetlands are prominent to the south and west. US Highway 19 is *not* present to the west. There are cleared agricultural plots to the east.

1951—The site is very wooded which appears to be natural growth over time. US 19 is now present. Citrus is planted to the north across Darlington Road. There is a cleared area to the east and another larger cleared area further east. Darlington Road becomes more defined to the east. There is a north-south road present to the east which appears to be the beginnings of Grand Boulevard.

1962—The site is now fully planted with citrus. US Highway 19 to the west has been widened. Across Darlington Road is a larger citrus grove. There is a short road cut into abutting land to the east with some citrus trees. Further east is a large citrus grove.

1973—The subject property remains a citrus grove. W of US 19 and north and east of the subject site is dense residential development. Adjacent areas to the west are now commercial or retail businesses. South of the property is low and ponded

1982—The subject property is now fully developed with the Polish club and buildings in the northeast corner.

1991—There is no significant change to the subject property. Development is mature and dense in all directions around the property. South of the site are two defined ponds.

2001—There are no significant material changes noted. New east-west rectangular buildings are to the south. The two ponds south of the subject property remain.

2011—The subject property remains improved. There are no vehicles around the buildings. There is some activity abutting south off the southwest corner.

2020—The northeast section of the site has now been cleared. There are cars parked off the southwest corner of the site. Otherwise, no significant changes were observed.

5.2.2 Aerial Photographs Provided

See **Figures 1** and **2** for current aerial photograph and **Appendix D** for historical aerals (from EDM with Google Earth consulted 1995 to present).

⁸ This section is a *summary* of our observations from a review of reasonably ascertainable historical aerial images. LAS also reviewed aerial images available on Google Earth beginning in 1995 to present. It is important to note that our comments *do not include exhaustive descriptions either of the subject property or adjoining properties* unless what is observed is in our professional opinion germane to the ultimate determination of real issues of environmental risk.

5.3 City Street Directories⁹

Acquired from ERIS. For complete list see **Appendix D**

4616 Darlington Road

<i>Year</i>	<i>Listing</i>
1956-1968	Street not listed
1971-1986	Street range not listed
2000-2008	Polish American Pulaski Inc
2012	Polish American Pulaski Inc Polish American Pulaski Assn
2016-2020	Polish American Pulaski Assn
2022	Not listed

Julie Lane

<i>Year</i>	<i>Listing</i>
1956-1971	Street not listed
1976	5253a Baker Bros Inc.whol air condtg refrig 5253b AAA Awnings Inc
1981	5257 One Stop Auto Garage
1986	5257 Vacant
2000-2003	2420 Frames & Things Mfg... <i>card printing and engraving, except greeting</i> 2420 New Age Graphix Signs... <i>card printing and engraving, except greeting</i> 2430 JMT Auto... <i>engine repair</i>
2008	2420 Frames & Things Manufacturing... <i>MFG signs</i> 2420 Frames & Things Silk Screening... <i>screen printing</i> 2420 New Age Graphix...special trade contractor 2430 JMT Auto... <i>automobile repairing & service</i> 2432 Bay Area Automotive Rfnshng... <i>auto body repair</i>
2012	2420 Brown & Bigelow... <i>non-classified establishment</i> 2420 New Age Graphix... <i>special trade contractor</i> 2432 Bay Area Automotive Rfnshng... <i>auto body repair</i>
2016	Brown & Bigelow...advertising-specialties (whls)
2020-2022	2420 Amy Oronoz...residential 2420 Hi-Liquidation...liquidators 2420 Hi-Liquidation...appliances-household-major dealers

According to ERIS, Darlington Road was not listed in the city directories from 1956-1968. From 1971-1986 Darlington Road was listed in the city directories but the street range that included 4606 & 4616 was not listed. From 2000-2020 4616 Darlington Road was listed with Polish American Pulaski Inc. or Polish American Pulaski Association.

EDM #1 listed the subject property as Interstate Brands Company 4620-4630 Darlington Road for underground storage tanks. Storage Tank Registrations show the tanks installed in 1975 on the subject property. This means Interstate Brands occupied the subject property from at least 1975.

5.4 Sanborn® Maps

No map coverage in the subject property area based on LAS' experience.

⁹ City street directories may exist for a particular site but may not prove useful in our judgment in some cases in determining previous site uses since they do not extend back far enough in time or do not produce the kind of useful historical information gained through the review/study of aerial images, atlases, Google maps, topographic maps, appraiser information, available deeds, and other historical information. As a matter of practice, LAS will typically order and review city street directories where the previously listed historical records are not reasonably ascertainable and/or in dense commercial/retail/industrial areas, especially where there has been redevelopment and the directories are known or likely to exist.

5.5 Historical Topographic Maps

1943 (First Available)—Site is wooded. Darlington is unimproved. Large wetland/pond off southwest corner. US 19 is not present. Two unimproved roads to the east south of Darlington, each with a house near the road. House south of the wetland/pond. House east of the wetland/pond. Significant wetlands to north.

1944—The site is vacant and cleared. Wooded to south and east. No change otherwise from 1943.

1948—No material changes observed on the map.

1974—The property is shown as a citrus grove. House omission tint surrounds site. Wetlands indicated to the southwest.

1987—Two buildings in northeast corner. One larger building in the southwest section. Citrus grove markings remain.

5.6 History of Property Use (see also **Section 6.1**)

The site was undeveloped, wooded and vacant until planted with citrus between 1951 and 1962. The building occupied by the Polish Club was constructed in 1973. Other structures in the northeast section were constructed prior to 1982, most likely in 1975. The buildings in the northeast section were occupied Interstate Brands, a wholly owned subsidiary of Hostess Brands, Inc. (bread products) until that company filed for bankruptcy in 2012. This branch was in all probability a warehouse/distributor for the area. AmSkills took possession of the site in late 2021 and is in the process of converting the former social club building into a training facility. In the meantime, portions of the site have been fenced off to operate an “RV” storage business.

5.7 Federal and State Regulatory Agency Records Review

5.7.1 Current Regulatory Lists and Records Consulted

LAS reviewed selected environmental regulatory records for registered/listed sites (see summary of listed sites found in **the table** below) in *general* accordance with ASTM E1527-21, using Environmental Data Management (EDM) data (see **Appendix E** for EDM's full report).

<i>Environmental Regulatory Listings</i>	<i>Search Distances (in miles)</i>	<i>Number of Sites Found Recorded by EDM</i>
<i>EPA DATABASES</i>		
National Priority List (NPL)	1.00	0
Superfund Enterprise Management System Active Site Inventory List (SEMSACTV)	0.50	0
Comprehensive Environmental Response, Compensation & Liability Information System List (CERCLIS)	0.50	1
Superfund Enterprise Management System Archived Site Inventory List (SEMSARCH)	0.50	1
Archived CERCLIS Sites (NFRAP)	0.50	1
Emergency Response Notification System List (ERNS)	0.25	2
RCRIS Handlers with Corrective Action (CORRACTS)	1.00	0
RCRA-Treatment, Storage and/or Disposal Sites (TSD)	1.00	0
RCRA-LQG, SQG, CESQG and Transporters (NONTSD)	0.25	2
Tribal Tanks List (TRIBALTANKS)	0.25	0
Tribal LUST List (TRIBALLUST)	0.50	0
Brownfields Management System (USBRWNFLDS)	0.50	0
US Institutional and/or Engineering Controls (USINSTENG)	0.25	0
NPL Liens List (NPLLIENS)	1.00	0
Enforcement and Compliance History (ECHO)	0.25	8
<i>FDEP DATABASES</i>		
State NPL Equivalents (STNPL)	1.00	0
State CERCLIS Equivalents (STCERC)	0.50	2
Solid Used Facilities List (SLDWST)	0.50	3
Leaking Underground Storage Tanks List (LUST)	0.50	6
Underground/Aboveground Storage Tanks (TANKS)	0.25	3
State Designated Brownfields (BRWNFLDS)	0.50	0
State Voluntary Cleanup (VOLCLNUP)	0.50	2
State Institutional/ Engineering Controls Registry (INSTENG)	0.25	0
State Dry Cleaners (DRY)	0.50	1
<i>SUPPLEMENTAL DATABASES</i>		
Facility Registry System (FRS)	0.25	10
Toxic Release Inventory System (TRIS)	0.25	0

5.7.2 Summary and Discussion

EDM identified 17 facilities within ASTM-specified search radii. ***The subject property was found listed*** with a previous leaking UST (FDEP Fac. No. 8630293). LAS has summarized the data available on the UST in the table below. LAS has also provided information on ten (10) other facilities in the vicinity of subject property (within ¼ of a mile), only one of which (adjacent Walgreens) was at a higher reported elevation. A CERLIS site 1,690 feet south of the subject property (Tarpon Tool Corporation, **EDM No. 13**) was discounted due to 1) its distance away from the property although at a higher reported elevation and 2) intervening hydraulic barriers (see **Appendix E** for EDM's full report).

Facility	Regulatory Nos.	Address	Lists	Direction/ Miles/ Feet ±/ Elevation per EDM	Comments
INTERSTATE BRANDS CO- HOLIDAY EDM No. 1	8630293	4630 E DARLINGTON RD HOLIDAY, FL 34690	LUST TANKS	SUBJECT PROPERTY (PASCO CO. PARCEL AND ABUTTING PARCEL TO EAST)	Discharge reported 6/20/88. Was in state-funded cleanup program (EDI). Received No Further Action/Site Rehabilitation Completion Order (NFA/SRCO) 6/24/10. Shallow soil and groundwater impacted. Deep wells not >state limits. 41 tons of soil removed. 17 tons of concrete removed. One (1) 2,000-gallon leaded gas UST removed 12/12/01. Installed 7/1/75. Lead in groundwater had to be <state cleanup target limit (CTL) for four quarters for NFA to be granted. Conditionally approved 3/11/10 subject to formal abandonment of monitoring wells. Groundwater contamination appeared to extend onto abutting parcel to east and possibly onto the abutting parcel to the west (both "on-site"). Main contaminant lead in water. Shallow groundwater moving to northwest in 2006. Interstate Brands Corporation was a wholly owned subsidiary of Hostess Brands, Inc., with product line of baked goods such as bread, buns, rolls, snack cakes, doughnuts, sweet rolls and similar products. This company filed for Chapter 11 in 2012.
WALGREENS HOLIDAY EDM No. 2	110037934983	US-19 & DARLINGTON RD HOLIDAY, FL 34691	ECHO FRS	W/0.03/158 HIGHER	If included on ECHO and/or FRS, found on a database or applied for National Pollutant Discharge Elimination System (NPDES) permit, etc. Not considered significant/material environmental/contamination concerns.
UNKNOWN SHEEN INCIDENT AT US 19 AND DARLINGTON ROAD BEHIND THE PLAZA. EDM No. 3	1203859	HOLIDAY, FL	ERNS	W/0.09/475 LOWER	This "unknown" sheen on the surface of a pond to the west allegedly resulted in a fish and animal kill in 2018. There was no apparent follow-up to this claim or follow-up report on ERNS. This "impacted" area was west and down-gradient to the subject property.
TENORE TOWERS EDM No. 4	110024813727	2401 US HWY 19 HOLIDAY, FL 34691	ECHO FRS	W/0.12/634 LOWER	See EDM No. 2.
OIL SPILL (PROGRESS ENERGY) EDM No. 5	110030915678 618666	2435 US 19 HOLIDAY, FL 34690	ECHO FRS ERNS	W/0.13/686 LOWER	A 5-gallon oil spill in pond occurred at the site of a public utility in 2007. A contractor was hired to address this matter. This impacted area was west and down-gradient to the subject property.
CVS PHARMACY #1328 EDM No. 6	110045969403 FLR000186205	2513 US HIGHWAY 19 HOLIDAY, FL 34691	ECHO FRS NONTSD	W/0.15/792 LOWER	The pharmacy is a conditionally exempt small quantity generator of hazardous wastes (CESQG) as of 2019 by generator notification (<100 kg/mo). Waste codes can be found in the EDM report under No. 6. The facility was last inspected 9/30/14. At the time, the facility was considered a SQG (<1000 kg/mo).
PEST CONTROL GENERAL STORE EDM No. 7	FL0000642546	2636 US HWY 19 N HOLIDAY, FL 34691	FRS	NW/0.19/1,003 LOWER	See EDM No. 2.
DAVID MACLENNAN EDM No. 8	101787	4711 AEGEAN AVE HOLIDAY, FL 34690	SLDWST	NE/0.19/1,003 LOWER	This is an inactive waste tire collector of no consequence to the subject property.
SALVATION ARMY-HOLIDAY, FL EDM No. 9	110020170857	2225 US HIGHWAY 19 HOLIDAY, FL 34691	ECHO FRS	SW/0.19/1,003 LOWER	See EDM No. 2.
CASABLANCA COIN LAUNDRY & DRY CLEAN ALDI #32 HOLIDAY EXPANSION EDM No. 10	6379230 950065111000 110058283478 FLD981750243	2643 US HWY 19 HOLIDAY, FL 34691	DRY ECHO FRS NONTSD TANKS	NW/0.21/1,108 LOWER	Not a generator of hazardous wastes by inspections 10/23/00 and 10/26/86. No violations reported. This closed facility was >1,000 feet northwest and down-gradient to the subject property. Not considered a significant/material environmental or contamination concerns.
CAMPING WORLD OF HOLIDAY, FL EDM No. 11	110067176068	2132 ARDSLEY LN HOLIDAY, FL 34690	ECHO FRS	NW/0.23/1,214 LOWER	See EDM No. 2.

UST=underground storage tank. TANKS=state storage tank list. LUST=leaking underground storage tank. DRY=dry cleaner. ERNS=Federal spills database. NONTSD=RCRA listing, i.e., hazardous waste generator.

None of the above listed facilities, with obvious exception of No. 1, found within the ASTM-prescribed search radii, were realistic contamination threats to the subject site due to proximity, hydraulic gradient, and/or nature of activity.

5.7.3 Other Regulatory Federal and/or State Records Reviewed

LAS checked appropriate Florida Department of Environmental Protection (FDEP) Oculus website files¹⁰ for the subject facility and certain nearby listed facilities. These include, but are not limited to, storage tank facilities, hazardous used generators, landfills, cattle dip vat locations (none obvious) and waste cleanup sites. *The known regulatory listings from the EDM report contain links to state databases which have been checked where appropriate.*

See **Appendix E** for selected contents in the FDEP file for the subject property and **Section 5.7.2** for brief commentaries on nearby regulatory listed facilities.

5.8 Tribal Lands Records Review

The subject site was not near property controlled by tribal interests. (Nearest Tribal Interest in Tampa > 25 miles east)

¹⁰ <http://dwmedms.dep.state.fl.us/Oculus/servlet/login>

5.9 Local Governmental Agency Records Review

5.9.1 Pasco County Property Appraiser

LAS utilized the website of the Pasco County Property Appraiser (PCPA) in this report. The following data was culled from appraiser information.

<i>Physical Address/ Parcel ID No./ Zoning</i>	<i>Owner</i>	<i>Ac. ± SF</i>	<i>Building Constructed</i>	<i>Acquired (based on deed)</i>
4606 Darlington Road Holiday, Florida 34690 30-26-16-0010-03800-0010 C-2	AMSKILLS INC 7143 STATE ROAD 54 PMB 285 NEW PORT RICHEY, FL 34653	3.26 12,424 (main)	1973	3/2021 (from Pasco Storage, Inc.)
4620, 4622, 4624, 4626, 4628, 4630, 4632 Darlington Road Holiday, Florida 34690 30-26-16-0010-03800-0030 C-2	AMSKILLS INC 4606 DARLINGTON ROAD HOLIDAY, FL 34690	0.77	1975	12/2021 (from Panagiotis & Pavlakidis)
Darlington Road Holiday, Florida 34690 30-26-16-0010-03800-0040 C-2	AMSKILLS INC 4606 DARLINGTON ROAD HOLIDAY, FL 34690	0.32	N/A	12/2021 (from Panagiotis & Pavlakidis)
Holiday, Florida 34690 30-26-16-0010-03800-0031 C-1	PASCO COUNTY FACILITIES MANAGEMENT DEPT 7220 OSTEEN RD NEW PORT RICHEY, FL 34653- 2359	0.1	1975 (Paving-- Road)	N/A

5.9.1.1 Legal Descriptions

See **Appendix F**.

5.9.1.2 Property Sizes

See **Appendix F** and **Section 5.9.1**.

5.9.1.3 Zoning

See **Appendix F** and **Section 5.9.1**.

5.9.1.4 Current Ownership Information

See **Appendix F** and **Section 5.9.1** and **5.9.1.5**.

5.9.1.5 Prior Ownership Records Review

LAS utilized available deeds from PCPA. Below is a *partial list* of prior owners. See **Appendix F**.

Parcel ID No. 30-26-16-0010-03800-0010 (3.26 ± Acre Parcel) (Main Parcel)		
	From	To
5/4/76	B&N Distributing Co. Inc.	Bank of Holiday Inc.
7/26/78	Bank of Holiday Inc.	Polish American Pulaski, Association, Inc.
7/24/18	Polish American Pulaski, Association, Inc.	Valdes Family Properties, LLC
3/27/20	Valdes Family Properties, LLC	Pasco Storage, Inc.
3/30/21	Pasco Storage, Inc.	AmSkills, Inc.

Parcel ID No. 30-26-16-0010-03800-0030 (0.77 ± Parcel) (Northeast Parcel)		
	From	To
1/14/75	William M. Register Jr., William T. Young, Jr. individually and as trustees and wives Roeloffe F. Register and Claudia P. Young	B&N Distributing Co. Inc.
6/15/83	B&N Distributing Co. Inc.	Pavlakidis, et al
11/10/08	Pavlakidis, et al	Personal Representatives' Distributive Deed
12/28/15	Pavlakidis, et al	Darlington Road Properties, LLC
12/22/21	Darlington Road Properties, LLC	AmSkills, Inc.

Parcel ID No. 30-26-16-0010-03800-0031 (Pasco Co. Parcel/.10 ± Acre Parcel) (West Side of Northeast Parcel)		
	From	To
5/4/76	B&N Distributing Co. Inc. (Robert W. Anderson)	Bank of Holiday Inc.

Parcel ID No. 30-26-16-0010-03800-0040 (0.32 ± Acre Parcel) (Southeast)		
	From	To
2/27/76	B&N Distributing Co. Inc.	John K. Boerema and Betty S. Boerema
6/15/83	John K. Boerema and Betty S. Boerema	Pavlakidis, et al
12/28/15	Pavlakidis, et al	Darlington Road Properties, LLC
12/22/21	Darlington Road Properties, LLC	AmSkills, Inc.

Pasco Storage, Inc. owns the parcel south of the main parcel. This parcel has the retention area that appears to receive stormwater runoff from the main parcel.

LAS checked reasonably ascertainable land atlases for Pasco County available through J. M. Smedley and Rockford Map Publishers (See **Appendix D**). These atlases indicated that the subject property was subdivided early on (1950s) as/by Tampa and Tarpon Springs Land Company, and no specific owner was shown.

No title search was provided to LAS for its review.

6.0 INTERVIEWS

6.1 Owner

LAS interviewed Mr. Tom Mudano of AmSkills, Inc., chief executive, on-site. His comments are incorporated throughout this report where appropriate. Some E-mail communications are included in **Appendix G**. Mr. Mudano arranged for his personnel to provide us with MSDS sheets for materials used in their operation. Links have been provided. See **Appendix E**.

6.2 Occupants

See **Section 6.1**.

6.3 Operator

See **Section 6.1**.

6.4 Government Officials

LAS checked the on-line files of the Florida Department of Environmental Protection (FDEP) for storage tank facilities, waste cleanup sites, cattle dip vats, landfills, and hazardous used generators.¹¹ Information on file with the Pasco County Property Appraiser (PCPA) was also utilized in this report.

6.5 Others (Including past owners, occupants, and operators)¹²

LAS consulted other reasonably ascertainable information to learn about the history of the site and surrounding areas, and previous owners, i.e., Secretary of State files, Google searches, etc.

¹¹ See **Footnote No. 11**.

¹² LAS attempts to contact parties previously associated with the property if there is a perceived “need to know.” Principals of LAS have prepared Phase I ESA reports for 30 years in the region, and a body of general knowledge has been acquired/compiled on many areas. Further, principals of LAS have lived and worked in the region since 1954, with families in the area since the early 1900s. This “common” knowledge is included herein where appropriate, in many cases without reference. LAS consulted other reasonably ascertainable information to learn about the history of the site and surrounding areas, as well as previous owners.

7.0 EVALUATION

7.1 Findings (“Environmental” Conditions On-Site)

1. For a period of time, all of the subject property as configured for this Phase I ESA was cultivated as a citrus grove. It is possible that agricultural chemicals were applied to these groves as a standard procedure. No structure was noted on aerial images that could be considered a potential storage building for these chemicals, nor was an obvious irrigation well which would be a likely mixing area for the chemicals. However, it is unknown when any of the three wells on the subject property were installed and if they were associated with the citrus grove. None of these existing wells appeared to be of large diameter.
2. The northeast and Pasco County parcels were both impacted by a leaking underground storage tank associated with Interstate Brands (Hostess). This was apparently a source of fuel for the bread company’s fleet of delivery trucks. The 2,000-gallon tank (and 41 tons of impacted soil) was removed in 2001 followed by shallow soil and shallow groundwater assessment.
3. A septic tank and drain field are present in the grassy area east of the main building on-site. In the past the building was occupied by a Polish social club and no handling/use of hazardous substances or petroleum products is assumed. It is possible in a commercial/industrial area for these kinds of systems to receive discharges that might contain harmful substances from an environmental standpoint. It is also assumed that Interstate Brands was also connected to a septic tank/drain field system for wastewater disposal. Where its septic tank/drain field system was located is unknown.
4. Three (3) electric water wells were observed on the subject property. The site is not connected to municipal sources of potable water (or sanitary sewer) although apparently available along US Highway 19 and in residential communities to the north and east.
5. An underground grease trap is at the southeast corner of the building.
6. The remaining permanent building on the subject property was constructed in 1973 at a time in which asbestos containing materials (ACM) were still used in construction. These materials were ultimately phased out due to EPA bans in the ensuing years. It is possible that this building contains some of these materials which if friable could be an indoor air quality threat.
7. Some facilities were identified along US Highway 19 and Julie Lane to the west on regulatory and city street directory listings that would appear to have the potential of adversely impacting the subject property as configured for this assessment by the apparent nature of their operations (auto repair, auto body repair, printing, engraving, etc.).

7.2 Opinions (correspond to above numbers)

1. While the property was devoted to citrus during at least the 1960s and 1970s, it is not possible to conclude that agricultural chemicals were stored and/or mixed on the site. Other groves were present in the area, specifically north of the property across Darlington Road that could have been owned by the same party. It is possible that storage facilities were on adjacent groves and chemical mixing was off-site. It is also important to note that the property was developed after the citrus trees were removed. In our experience, buildings and pavement subsequently added would serve to mitigate residual chemical concentrations that might have been present. In our opinion, this past site usage is not a **REC**. If any impacts do remain, in our opinion they would be “*de minimis*” in nature.
2. Regarding the former fuel UST location, after contamination assessment, some remediation in the form of contaminated soil removal, shallow groundwater monitoring, and consideration by the Florida Department of Environmental Protection (FDEP), the site owners received a No Further Action/Site Rehabilitation Completion Order in 2010. Based on the assessment tasks performed at the time, the decision of the Department, and our past experience with similar systems, in our opinion, no further assessment is warranted in this area at this time. **Accordingly, based on ASTM E1527–21, this finding can be considered an HREC.**

3. The main facility on the subject property as configured for this assessment is served by a septic tank and drain field for wastewater disposal. In past years, a social club occupied this building, and it is assumed that occupants did not utilize hazardous substances or petroleum products. As for activities occurring while Interstate Brands was on-site, the nature of that business appeared to be warehousing and distribution. It is unlikely that significant hazardous substances or petroleum products were utilized in conjunction with Interstate's operation. **In our opinion, environmental/contamination risks associated with septic tank/drain field systems previously or presently on the subject property are not RECs at this site.** If any impacts do remain or are present, in our opinion they would be "*de minimis*" in nature.
4. **In our opinion, this finding is not a REC.** If any or all of these wells are not utilized in the future, they should be properly abandoned in accordance with water district rules by a Florida-licensed water well contractor. It is possible for these wells to be converted to irrigation wells in the future if the property is connected to a municipal source of potable water.
5. This grease trap should be checked and drained if necessary. **This is only a potential health concern and is not in our opinion a REC.**
6. Based on our site reconnaissance, the main building appears to have been significantly "gutted" for conversion to a training facility. It is also primarily of metal construction. In our opinion, it is unlikely that ACM still remain in the building sufficient enough to cause any material environmental harm. **In our opinion, this finding is not a REC; however, see Section 8.1.**
7. Based on our review of the physical setting of the site, it is likely that the subject property is hydraulically up-gradient to the facilities located on Julie Lane and US Highway 19 to the west. It also did not appear that these operations were expansive enough and/or handled quantities of materials that would be prone to be significantly harmful to the environment or to migrate in groundwater, except possibly the printing and engraving operations. **Based on these factors, it is our opinion that activities on adjoining properties to the west do not pose a material/realistic/imminent environmental/contamination threat to the subject property as configured for this assessment and are not by definition RECs.**

Conditions described and discussed above, in our opinion, should be carefully considered by the client as carrying various levels of *business environmental risk (BER)* (See Section 2.1). Many factors/risks that LAS might not consider, in its own opinion, material enough to rise to the level of a REC, CREC or HREC, may be reason enough for the client/user, in its own view, to proceed with further assessment and/or subsurface testing, in light of the client/user's intentions and objectives for the site, risk posture, legal issues, lender requirements, future plans, and/or any number of other economic and financial considerations.

7.3 Additional Investigation Required to Form Conclusion (found in Section 7.5)

In our opinion, not required.

7.4 Data Gaps

In our opinion, there were no material data gaps/failures encountered in completing this Phase I ESA.

7.5 Conclusions (refer to Section 7.2)

Land Assessment Services, Inc. (LAS) has performed a Phase I environmental site assessment (Phase I ESA) of the **AmSkills Site**, located in Holiday, Pasco County, Florida, in general conformance with the scope of work and limitations of ASTM E1527-21.

This assessment has revealed no evidence of RECs, controlled RECs, or historical RECs, in connection with the subject property as configured for this assessment, except the HREC relating to the former UST on the “northeast” parcel and/or the Pasco County parcel (Parcel Nos. 30-26-16-0010-03800-0030 and 30-26-16-0010-03800-0031, respectively). In our opinion, additional testing is not warranted in this area at this time based on FDEP file data, the facility’s NFA status, and the SRCO.

See **Section 8.1** for Non-ASTM Scope considerations, i.e., ACM.

It is important to consider and weigh the opinions in preceding Section 7.2 when evaluating the RECs (or CRECS or HRECS) listed above, or the exclusion of a particular environmental finding as a REC, CREC or HREC. The client/user’s risk posture and objectives should be contemplated considering the conditions identified and the mitigating factors presented herein.

7.6 Deviations from ASTM E1527-21

In our opinion, there were no material deviations from ASTM E1527-21 in this Phase I ESA report.

7.7 Additional Services Performed

None.

7.8 Signature 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 §312.10 of 40 CFR 312, and 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 all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. See **Appendix H** for “qualifications of participating environmental professionals.”



Richard C. Reynolds
President

Signature/Seal

7.9 Statements of Qualifications

See **Appendix H**.

8.0 NON-ASTM SCOPE CONSIDERATIONS

- 8.1 Asbestos Containing Materials (ACM) may have been used in the construction of the main building (pre 1980). However, future risks to occupants are limited due to the nature of the building (metal) and renovations already completed. The timeframe in which the building was constructed was just prior to EPA bans on asbestos in building materials. It took a period of time for these materials to be phased out. There is no way of knowing for certain if ACM are present in the building without sampling and laboratory testing.

9.0 APPENDICES

See Attached.