

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Of

Commercial Building (0.11 +/- Acres)



**2630 E. Lake Avenue (33610)
Tampa, Hillsborough County, Florida**

Issued to:

ABC Inc.
1234 Main Street
Tampa, Florida 33601

Issue Date:

August 28, 2017

Prepared by:



**6408 West Linebaugh Avenue
Suite 111
Tampa, Florida 33625
813/335-5811 (Main)
813/908-2233 (Office)
813/908-3588 (Fax)**

LAS Project No. 17-462-01099

*las@landassessmentservices.com
www.landassessmentservices.com*

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Commercial Building (0.11 +/- Acres)
2630 E. Lake Avenue (33601)
Tampa, Hillsborough County, Florida

TABLE OF CONTENTS

	<u>Page</u>
1.0 SUMMARY, FINDINGS, OPINIONS, CONCLUSIONS	1
2.0 INTRODUCTION	5
3.0 USER PROVIDED INFORMATION	9
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	
4.0 RECORDS REVIEW	10
4.1 Federal and State Regulatory Agency Records Review	
4.2 Tribal Lands Records Review	
4.3 Local Agency Records Review (including Property Ownership Records)	
4.4 Review of Aerial Photographs	
4.5 City Street Directories	
4.6 Sanborn® Maps	
4.7 History of Property Use	
4.8 Applicable or User Provided Documents	
4.9 Physical Setting Sources	
5.0 SITE RECONNAISSANCE	18
5.1 Site Name	
5.2 Location	
5.3 Inspection Date	
5.4 Site Inspector	
5.5 Site Representative Present	
5.6 Inspection Process and Procedures	
5.7 Surface Access and Egress	
5.8 General Description of Current Improvements and Site Uses	
5.9 Specific Site Observations	
5.10 AST/UST Systems	
5.11 Transformers and PCB Equipment	
5.12 Hazardous Substances and Petroleum Products	
5.13 Drums and Storage Containers	
5.14 Area Reconnaissance (including Vapor Migration Potential)	
6.0 INTERVIEWS	23
6.1 Owners	
6.2 Occupants	
6.3 Operators	
6.4 Government Officials	
6.5 Others (including Past Owners/Occupants/Operators)	
7.0 EVALUATION	24
7.1 Findings	
7.2 Opinions	
7.3 Additional Investigations Required to Form Conclusion	
7.4 Data Gaps	
7.5 Conclusions	
7.6 Deviations from ASTM E 1527-13	
7.7 Additional Services Performed	
7.8 Signature of Environmental Professional	
7.9 Statement of Qualifications	
8.0 NON-ASTM E 1527-13 SCOPE ITEMS	27

PHASE I ENVIRONMENTAL SITE ASSESSMENT

***Commercial Building (0.11 +/- Acres)
2630 E. Lake Avenue (33601)
Tampa, Hillsborough County, Florida***

TABLE OF CONTENTS (CONTINUED)

9.0 APPENDICES

28

Appendix A – Glossary of Terms Used in ASTM E 1527-13
Appendix B – Regulatory Records Documentation
Appendix C – Property-related Documentation
Appendix D – Historical Research Documentation
Appendix E – Physical Setting Resource Documentation
Appendix F – Site Photographs
Appendix G – Interview Documentation
Appendix H – Qualifications of Participating Professionals

PHASE I ENVIRONMENTAL SITE ASSESSMENT

***Commercial Building (0.11 +/- Acres)
2630 E. Lake Avenue (33601)
Tampa, Hillsborough County, Florida***

1.0 SUMMARY/FINDINGS/OPINIONS/CONCLUSIONS

1.1 Site Name

Commercial Building (0.11 +/- acres)

1.2 Site Location

2630 E. Lake Avenue
Tampa, Hillsborough County, Florida

(See **Figure 1** following **Page 18** and **Figure 2** following **Page 19**)

Section 8 of Township 29S, Range 19E

1.3 Inspection Date

On 8/17/17, LAS visited the subject site at approximately 9:00 a.m. Weather was clear and sunny. Temperature was at 88° F. LAS was escorted by Mr. John Smith of the ABC, and Mr. Dave George, operator of Unique Car Detailing.

1.4 Assessment Team

Richard C. Reynolds, EP, President

1.5 Summary

Site Description

The subject building was obviously constructed in the 1950s, and was configured similarly to an old gas station, but had two front entrance doors; the west into the business office, and the east into a vacant restaurant area. The building was surrounded on its east, west and south sides by a concrete block wall. Entrances to the open, partially-covered east and west sides were through locked iron gates. The concrete floor of the rear area of the building was covered with a flat metal roof supported by aluminum posts. In the northwest corner was a concrete pit or vault. Miscellaneous items were observed in the rear of the building, including, but not limited to, exercise equipment, washing machines, bicycles, potted plants, chairs, bench, and dog pen. The area on the east side was a former walk-up window for the restaurant. On the west side of the building were two (2) "tote" containers with car cleaning liquids and other items used in the car detailing business. Inside the office area appeared to be a compressor, that likely was moved outside for use in the business, miscellaneous items, supplies, and a security system. The restaurant had a tiled sit-down area, restrooms, kitchen with range and sink, and supply closet. In the floor outside the kitchen area was a grease trap with steel cover. The rear area may have also been used for restaurant seating at one time (auto repairs were once performed in this area). The concrete pavement in the front of the

building was cracked, with some sections revealing an original concrete surface. There were semblances of a previous dispenser island and a port hole filled with soil or concrete. Much of the pavement to the south was new which was apparently in the city’s easement (driveway into building and sidewalks—part of a beautification/traffic calming effort on E. Lake Avenue). On the south side of the structure were canopies to shelter the vehicles while detailed.

North of the site was an alley and vacant property. Further north was 31st Avenue. South of the property was E. Lake Avenue and the CDC’s Youth Center. Southeast of the property was a laundromat reportedly developed by the CDC. East of the site was 29th Street and a soul food store (this was a Texaco station at one time) and some apartments. West of the property was the asphalt-paved parking lot of a Baptist church. The church building was on the adjoining lot further west.

Site History

The subject site was platted as Campobello, Block 16, Lot 24 in 6/24/1903. At that time, E. Lake was named Clark Avenue, and 28th Street was named Richmond Avenue. 29th Street was named Campobello Avenue, which contained or was to contain an electric railway. From at least 1951 to at least 1961, Frank’s Service Station occupied the site. By 1956, Diner Café was listed at 2630 ½. By 1966 the station was no longer operational, but the site was occupied by Jimmie’s Garage (rear area). The restaurant (2630 ½) and the filling station (2630) were listed as vacant. By 1971 the rear area was vacant and another restaurant, Charlie’s Chicken (Charles and Frederica Clark) occupied 2630. City street directories indicated the “rear” area was vacant and 2630 ½ was used for storage. By 1976, 2630 was vacant and 2630 ½ was used for storage. However, in 1981 and 1986, Charlie’s Restaurant was again shown as occupant of 2630. As of 1992, 2628-2630 were vacant. In 1997, another restaurant occupied 2630 ½, but no occupant was listed for 2630. In 2003, Evelyn Roberts was reported to occupy 2630, with no specific use mentioned in the city street directory volume for that year. As of 2008, 2630 was occupied by Unique Auto Detailing, the current occupant.

Regulatory Records Review

LAS identified thirty-two (32) listed facilities within the specified ASTM search radii. The subject site was *not found* listed, but was formerly a filling station. The two (2) closest listed sites were abutting to the west and adjacent to the east. See summaries of the two (2) facilities below:

<u>Facility</u>	<u>FDEP No.</u>	<u>Address</u>	<u>Lists</u>	<u>Miles +/-/ Direction/ (Feet +/-)</u>	<u>Comments</u>
TAMPA CITY-RIGHT OF WAY	9808589 9808589	2628 E. LAKE AVE. RIGHT-OF-WAY TAMPA, FL 33601	LUST TANKS	0.02 W ABUTTING	Abandoned 500 +/- UST found in city ROW. Closed in-place 11/3/06 because of the prevalence of buried utilities. Discharge 9/13/06. Site Rehabilitation Completion Order (SRCO) 12/11/08 after water monitoring.
TEXACO STATION	8627321 8627321CLN 8625796 8627321	2802 E. LAKE AVE. TAMPA, FL 33605	LUST STCERC TANKS	0.02 E ADJACENT	Discharge 6/17/92. Inactive site. Cleanup required. State-funded cleanup. Low priority score: “10”. (4) underground storage tanks (USTs) removed ranging from 550-2000 gallons (leaded and unleaded gas and waste oil tank).

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. The subject site was formerly used as a filling station and auto repair shop. It is not known if the fuel tanks were removed from this property. It is also possible that fuel and/or waste oil tanks are in more than one location on the site.
2. An underground storage tank (UST) was discovered in the city of Tampa right-of-way (ROW) in front of the abutting church to the west in 2006. A discharge was reported for this tank.
3. A filling station was located adjacent east (Texaco) during the 1960s-1980s.
4. The property was developed before EPA bans were instituted prohibiting use of asbestos fibers in most construction materials (ACM) (a non-scope finding²).

1.7 Opinions (correspond to above numbers)

1. Abandoned USTs, if present, could still hold fuel, and could have deteriorated over time and contaminated the soils and groundwater of the subject site. Since the auto repair business may have been a separate operation, with entrance off N. 28th Street to the east, a waste oil UST (or another fuel UST) might have been in use in the rear of the property. **This finding, in our opinion, based on our understanding of the ASTM E 1527-13 definition of a Recognized Environmental Condition (REC)³, is a REC.**
2. This tank was found, assessed, and properly closed “in-place.” A Site Rehabilitation Completion Order (SRCO) was issued by the state. From our review of available regulatory documentation, contamination associated with this tank was inconsequential and reported far enough away from the subject site to pose no material environmental/contamination threat to the property. **This finding is a historical REC⁴ according to our understanding of the ASTM E 1527-13 standard. In our opinion, the presence of this former tank near the subject site does not warrant further assessment on the property at this time.**
3. Known storage tanks have been reportedly removed from this site, and the facility is eligible for state-funded petroleum product contamination cleanup. However, the site has a low priority cleanup score in the state’s program, and assessment/remediation efforts appear inactive. Since the tanks have been removed, associated soil and/or groundwater contamination will have improved over time due to natural attenuation. **In our opinion, because of the nature of the site (across street, closed station, passage of time, tanks removed, eligible for state-funded cleanup, etc.), this finding is not a REC.**
4. This is a “non-scope” finding which should be considered a “business environmental risk.” Any application for a demolition or construction permit must be accompanied by a “pre-demolition asbestos survey.” It is possible that special abatement procedures must be followed if ACM are found and the building is demolished or remodeled.

¹ These can include *recognized environmental conditions (RECs)* (see **Footnote No. 3**). **Section 1.7** discusses LAS’ reasoning for considering or not considering a particular environmental condition a “recognized environmental condition.”

² Not addressed under ASTM E 1527-13 except as a “business environmental risk.” See **Sections 2.1** and **8.0**.

³ In defining a standard of good commercial and customary practice for conducting an environmental site assessment of a parcel of property, the goal of the processes established by this practice is to identify *recognized environmental conditions*. The term recognized environmental conditions means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. “De minimis” conditions are not recognized environmental conditions.

⁴ A Historical Recognized Environmental Condition (HREC) refers to a past release that has been remediated to below “residential” standards and given regulatory closure with no use restrictions. HREC is defined by ASTM in the E1527-13 standard as “a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

1.8 Conclusions (also refer to Sections 1.7 and 7.5)

Land Assessment Services, Inc. (LAS) has performed a Phase I environmental site assessment (Phase I ESA) of the **Commercial Building (0.11 +/- Acres)**, located at 2630 E. Lake Avenue, in Tampa, Hillsborough County, Florida, in general conformance with the scope of work and limitations of ASTM E 1527-13.

This assessment has revealed no evidence of RECs, controlled RECs,⁵ or historical RECs, in connection with the subject property, except for:

Previous use of the subject site as a gasoline filling station and auto repair shop, without indication that the property was assessed for soil and/or groundwater contamination and the tanks were properly removed or closed in-place.

⁵ A Controlled Recognized Environmental Condition (CREC) is a new term introduced in the ASTM E1527-13 standard. The Controlled REC concept was introduced to address contaminated sites that have received risk-based regulatory closure, where no further remediation is required but residual contamination still exists at a site and the property is subject to some sort of control or use restriction.

2.0 INTRODUCTION

2.1 Purpose and Scope of ASTM E 1527-13 and Phase I ESA (see Appendix A)

The purpose of *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, ASTM Designation: E 1527-13 is to define good commercial and customary practice in the United States of America for conducting an *environmental site assessment* 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*.⁶ 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 practice 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” (see next paragraph) associated with a large commercial real estate parcel or transaction may necessitate investigation beyond that identified in 1527-13.**

Other “non-scope considerations, that the user might elect to address as an “additional issue outside standard practices,” are not included or addressed in this Phase I ESA, such as “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 1527-13.

LAS has only included some portions of ASTM E 1527-13 for clarification purposes only. See **Appendix A** for a glossary of terms and common acronyms.

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 prescribed in *ASTM E 1527-13*. However, it should be noted that no environmental site assessment can wholly eliminate uncertainty regarding the potential for *recognized environmental conditions* (RECs)⁷ 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, 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 E 1527-13 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.

⁶ 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.

⁷ See **Footnote No. 3**.

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 as a result of completing the ASTM E 1527-13 standard of work does not guarantee that such conditions do not exist on-site in a localized, covered over or buried event.

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 E 1527-13 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 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 of 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.

2.3.6 Third Parties/User Reliance

This report is intended exclusively and solely for the use and benefit of *ABC Inc.*, subject to the terms, conditions and limitations found herein, and in LAS' scope of services dated July 13, 2017, which was authorized by the client/user on July 18, 2017. 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**.

2.4 User Responsibilities

2.4.1 Scope

The “All Appropriate Inquiries” Final Rule (40 CFR 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. If the user does not communicate the information to the environmental professional regarding responsibilities stated below, the environmental professional should consider the significance of the absence of such information pursuant to a “data gap.” Nothing in this section relieves the environmental professional of satisfying the environmental professional responsibilities set forth in the All Appropriate Inquiries Final Rule (40 CFR Part 312).

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

To meet the requirements of 40 CFR 312.20 and 312.25, a search for the existence of environmental liens and AULs that are filed or recorded against the property must be conducted. Environmental liens and AULs are legally distinct instruments and have very different purposes and both can commonly be found within recorded land title records (e.g., County Recorder/Registry of Deeds). The types of title reports that may disclose environmental liens and AULs include Preliminary Title Reports, Title Commitments, Condition of Title, and Title Abstracts. Chain of title reports will not normally disclose environmental liens or AULs. Environmental liens and AULs that are imposed by judicial authorities may be recorded or filed in judicial records only. In jurisdictions where environment liens or AULs are only recorded or filed in judicial records, the judicial records must be searched for environmental liens and AULs. Any environmental liens and AULs known to the user should be reported to the environmental professional conducting a Phase I Environmental Site Assessment. **Unless added by a change in the scope of work to be performed by the environmental professional, this practice does not impose on the environmental professional the responsibility to undertake a review of recorded land title records and judicial records for environmental liens and AULs.** The user should either (1) engage a title company, real estate attorney, or title professional to undertake a review of reasonably ascertainable recorded land title records and lien records for environmental liens and AULs currently recorded against or relating to the property, or (2) negotiate such an engagement of a title company, real estate attorney, or title professional as an addition to the scope of work of the environmental professional. The search for environmental liens and AULs in this section is in addition to the environmental professional’s search of institutional control and engineering control registries.

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 recorded land title records are not considered to be reasonably ascertainable unless applicable federal, tribal, state, or local statutes, or regulations specify a place other than recorded land title records for recording or filing of environmental liens and AULs.

2.4.3 Specialized Knowledge or Experience of the User

Users must take into account their specialized knowledge to identify conditions indicative of releases or threatened releases. If the user has any specialized knowledge or experience that is material to recognized environmental conditions regarding the 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 environmental professional conducts the site reconnaissance.

2.4.4 Actual Knowledge of the User

If the user has actual knowledge of any environmental lien or AULs encumbering the property or regarding the property, the user should communicate such information to the environmental professional. The user should do so before the environmental professional conducts the site reconnaissance.

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 property to the fair market value of the property if the 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 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 in order to ascertain fair market value of the property. The user should inform the environmental professional if the user believes that the purchase price of the 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 property must be taken into account by the user. If the user is aware of any commonly known or reasonably ascertainable information within the local community about the property that is material to recognized environmental conditions regarding the property, the user should communicate such information to the environmental professional. The user should do so before the environmental professional conducts the site reconnaissance. 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 property and the ability to detect releases or threatened releases by appropriate.

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. The user and the environmental professional might also need to modify the scope of services performed under this practice for special circumstances, including, but not limited to, operating industrial facilities or large tracts of land (large areas or corridors).

3.0 USER PROVIDED INFORMATION

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

The client/user reported no environmental liens or AULs to LAS. **A current title search was not provided by the client for review of matters of public record, e.g. environmental liens.** We will review a title search at a later time, if provided by the client/user. *The User Questionnaire provided was returned completed and the client/user's responses are incorporated herein (see Appendix G).*

- 3.2 Specialized Knowledge or Experience of the User

The client/user reported no “specialized knowledge” pertaining to the subject site to LAS.

- 3.3 Actual Knowledge of the User

The client/user reported no “actual knowledge” pertaining to the property to LAS.

- 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 about the subject area.

- 3.6 Degree of Obviousness

The client/user was unaware of prior uses of the site that might result in a release, and did not know how to interpret present site conditions.

- 3.7 Reasons for the Phase I ESA

The client/user is considering purchasing the property.

4.0 RECORDS REVIEW

4.1 Federal and State Regulatory Agency Records Review

4.1.1 Current Regulatory Lists and Records Consulted

LAS reviewed selected environmental regulatory records for registered/listed sites in *general* accordance with ASTM 1527-13, using Environmental Data Management (EDM) data (see **Appendix B** for EDM's report and **Table 1** and **Section 4.1.2** below for a brief summary of EDM's findings).

TABLE 1--ENVIRONMENTAL/REGULATORY REVIEW SUMMARY

Environmental Regulatory Listing	Search Distances (in miles)	Number of Sites Found Recorded
EPA DATABASES		
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	0
Superfund Enterprise Management System Archived Site Inventory List (SEMSARCH)	0.50	0
Archived Cerclis Sites (NFRAP)	0.50	0
Emergency Response Notification System List (ERNS)	0.25	0
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	0
Tribal Tanks List (TRIBALTANKS)	0.25	0
Tribal LUST List (TRIBALLUST)	0.50	0
Brownfields Management System (USBRWNFLDS)	0.50	23
US Institutional and/or Engineering Controls (USINSTENG)	0.25	0
FDEP DATABASES		
State NPL Equivalent (STNPL)	1.00	0
State CERCLIS Equivalent (STCERC)	0.50	11
Solid Waste Facilities List (SLDWST)	0.50	1
Leaking Underground Storage Tanks List (LUST)	0.50	12
Underground/Aboveground Storage Tanks (TANKS)	0.25	6
State Designated Brownfields (BRWNFLDS)	0.50	0
State Voluntary Cleanup (VOLCLNUP)	0.50	1
State Institutional/ Engineering Controls Registry (INSTENG)	0.25	0
State Dry Cleaners (DRY)	0.50	0
SUPPLEMENTAL DATABASES		
Facility Registry System (FRS)	0.25	9
Toxic Release Inventory System (TRIS)	0.25	0

4.1.2 Summary and Discussion

EDM identified thirty-two (32) listed facilities within the specified ASTM search radii. The subject site was *not found* listed, but was formerly a filling station.

LAS has summarized listings within 1,100 +/- feet of the site below:

<u>EDM No.</u>	<u>Facility</u>	<u>FDEP No.</u>	<u>Address</u>	<u>Lists</u>	<u>Miles +/- Direction/ (Feet +/-)</u>	<u>Comments</u>
1	TAMPA CITY-RIGHT OF WAY	9808589 9808589	2628 E LAKE AVE RIGHT OF WAY TAMPA, FL 33601	LUST TANKS	0.02 W (105)	Abandoned 500 +/- UST found in city ROW. Closed in place 11/3/06 because of prevalence of buried utilities. Discharge 9/13/06. SRCO 12/11/08.
2	TEXACO STATION	8627321 8627321CLN 8625796 8627321	2802 E LAKE AVE TAMPA, FL 33605	LUST STCERC TANKS TANKS	0.02 E (105)	Discharge 6/17/92. Inactive site. Cleanup required. State-funded cleanup. Low priority score: "10". (4) USTs removed ranging from 550-2000 gallons (leaded and unleaded gas and waste oil tank).
3	CIAC SEGMENT I	110038521855	UNKNOWN TAMPA, FL 33601	FRS	0.04 E (211)	Routine permitting.
4	C8 - FOLIO 174152 TAMPA CITY-FRMR GAS STATION	110040477383 93121 9804459	2902 EAST LAKE AVENUE TAMPA, FL 33601 3701 N 29TH ST TAMPA, FL 33605	FRS USBRWNFLDS TANKS	0.05 E (264)	Vacant/undeveloped land with documented history of commercial land use which included a retail gasoline facility. U.S. Brownfield. Phase I ESA 12/11/08 and Phase II ESA 2/26/09 performed. No cleanup required. (1) 500-gallon UST removed 12/01.
5	EAST TAMPA AFFORDABLE HOUSING SITE #1	110038759297 60024	2631 EAST 32ND AVENUE TAMPA, FL 33601	FRS USBRWNFLDS	0.08 N (422)	Residential. 0.11 acres. U.S. Brownfield. Phase I ESA 4/25/07. No cleanup required.
6	CP DANNER CONSTRUCTION	9805687 9805687CLN	3511 29TH ST TAMPA, FL 33605	LUST STCERC	0.14 S (739)	Active state cleanup site. (1) 888-gallon UST installed in 1970.
7	EAST TAMPA AFFORDABLE HOUSING SITE	110038766047 60016	2507 EAST 29TH AVENUE EAST TAMPA, FL 33605	FRS USBRWNFLDS	0.16 W (845)	Residential. 0.1 acres. U.S. Brownfield. Phase I ESA 6/5/07. No cleanup required.
8	EAST TAMPA AFFORDABLE HOUSING SITE #9	110038759251 60007	2615 EAST 33RD AVENUE TAMPA, FL 33601	FRS USBRWNFLDS	0.17 N (898)	Residential. 0.12 acres. U.S. Brownfield. Phase I ESA 4/25/07. No cleanup required.
9	EAST TAMPA AFFORDABLE HOUSING SITE #10	110038759288 60023	2919 EAST 33RD AVENUE TAMPA, FL 33601	FRS USBRWNFLDS	0.21 NE (,1108)	Residential. 0.12 acres. U.S. Brownfield. Phase I ESA 4/27/07. No cleanup required.

The former tank in the COT ROW is indicative of the kind of tank(s) that may remain on the subject site relating to its previous use as a filling station. It is also important to note that tanks were routinely closed in-place with sand or concrete in the 1980s and earlier, with or without environmental testing. See **Appendix B** for selected copies of FDEP file documents. EDM's report in **Appendix B** has significant information regarding these facilities.

4.2 Tribal Lands Records Review

LAS checked a map of tribal lands in Hillsborough County and the subject site was not near property controlled by tribal interests. See **Appendix B**.

4.3 Other Governmental Agencies Agency Records Review

4.3.1 Environmental Protection Commission (EPC) of Hillsborough County

LAS contacted the Environmental Protection Commission (EPC) of Hillsborough County, and was sent *environmental* warning and complaint files for Section 8 of Township 29S, Range 19E. 83 complaints and 33 warnings were reported. The subject property was **not found**.

The closest listed complaint (8/24/06) involved an abandoned storage tank found in the City of Tampa ROW in front of the abutting church parking lot to the west (2628 E. Lake Ave.—EDM No. 1). The tank was estimated at 500-800 gallons. There was no petroleum odor in the tank. See **Section 4.1.2** and **Appendix B** for the resolution to this finding. Another complaint involved a former gasoline station site owned by the COT at the northeast corner of 29th Street and E. Lake Av. See EDM No. 4 above in **Section 4.1.2**.

It is important to note that complaints made to the EPC are often not confirmable or are found to be erroneous in nature. Also, some of the complaints that have “closing” dates are transferred to other departments and could be still active.

See EPC file data in **Appendix B** (recent EPC printouts).

4.3.3 Hillsborough County Property Appraiser⁸

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

Address/ PIN/Folio No.	Owner	Ac. +/- SF +/-	Buildings Constructed	Last Activity (based on deeds)
2630 E. Lake Avenue A-08-29-19-4NB-000015-00024.0 174183-0000	Annette Brooks	0.11 2,556 SF w/756 and 144 SF canopies	1953	2013

4.3.3.1 Legal Description

See **Appendix C**.

4.3.3.2 Property Size

See **Appendix C** and **Section 4.3.3**.

4.3.3.3 Zoning/Use

COD1 Comm Class 4, Neighborhood Commercial (CN). See **Appendix C**.

4.3.3.4 Current Ownership Information

See **Appendix C** and **Section 4.3.3**.

4.3.3.5 Previous Ownership Information (Partial)

See **Appendix C** for a copy of the deed available on the website of the HCPA.

Ainsworth B. Robinson, PR for the Estate of Diane J. Price to Annette Brooks	12/17/13
Peru Price to Diane J. Price	1/14/02
Curtis McFarland to Peru Price and Diane Price	12/3/96
Charlie Clark and Frederica A. Clark to Curtis McFarland	2/10/94
Angelina Dibona Tagliarini to Charlie Clark and Frederica A. Clark	1/30/70

⁸ <http://www.hcpafl.org/>

4.4 Review of Aerial Photographs

4.4.1 Summary of Selected Historical Aerial Photographs Acquired from the University of Florida⁹ (1938, 1948 not available, 1957), Florida Department of Transportation¹⁰ (1965-1987), and Google Earth (1995-2017)

1957—*Poor resolution.* General area developed with buildings and dwellings.

1965—Two (2) apparent buildings on-site. Rear may just be covered. Church abuts to W. One (1) building adjacent E. Building at SW corner of Lake and 28th.

1975—*Poor resolution.* Building on-site. Church to W. Area adjacent to E occupied.

1980—One (1) building on-site. Area occupied to N beyond alleyway (appears residential). Church to W, filling station to E. Large building adjacent S.

1987—No significant obvious changes noted.

1998—*Poor resolution.* However, no significant obvious changes noted.

2007—Lake Avenue appears to be improved, including ROW areas. Area to N cleared.

2017—No significant obvious changes noted.

4.4.2 Aerial Photographs Provided

See **Figures 1** and **2** for current aerial photograph and **Appendix D** for selected photographs.

4.5 City Street Directories (see Appendix D) See **Section 4.7** for *Site Specific* City Directory Info.

<i>Year</i>	<i>Address</i>	<i>Occupant</i>
1951, 1956 1961 1966 1971, 1976, 1981, 1986, 1997, 2003, 2008, 2013	2628 E. Lake Avenue	Mason Memorial Church St. Joseph's Methodist Church, Brown's Elementary School Lily White Hospital (storage) Peace Progressive Ind. Baptist Church
1966, 1971, 1976, 1981, 1986 1992	2802 E. Lake Avenue	A One Texaco Service Station Vacant
1951 1956, 1976, 1981 1961, 1966, 1971 1986	2631 E. Lake Avenue	Rabbit Foot Bar and Grill Stardust Bar (liquors) Stardust Bar, The Cherry's Grill Vacant
1966, 1971 1976 1981 1986, 1992 1997 2003, 2008, 2013	2804 E. Lake Avenue	Penny Pantry Grocery Your Fish Market Vacant King's Grocery Tampa Bay's Café & Market (?) Soul Food store

LAS reviewed available city street directories at the John F. Germany Library in downtown Tampa, Florida. 5 +/- year intervals consulted.

⁹ <http://ufdcweb1.uflib.ufl.edu/ufdc/?c=flap>

¹⁰ <http://www.dot.state.fl.us/surveyingandmapping/apac.shtm>

4.6 Sanborn® Maps

Sanborn fire insurance maps were obtained from GeoSearch. Years 1931, 1951, and 1979 were available/provided. See **Appendix D** for Sanborn Maps.

The subject site was vacant in 1931. Stores occupied the northeast corner of Lake and N. 28th St. (3702). A dry cleaner was at 3703 N. 28th St. The general area was primarily residential.

In 1951, the property was occupied by a store and filling station (south end—2630 E. Lake Av.) and an auto repair facility on a concrete floor (north end—3704 N. 28th St.). St. Joseph's Methodist Church occupied 2628 E. Lake, and the intervening lot was vacant. A store and restaurant, and a store, were at the southwest corner and northeast (3702 28th St.) corners of Lake and N. 28th St., respectively. Another filling station was at the northeast corner of 28th St. and Lake.

As of 1979, the property was improved with a store and restaurant (south ½). An auto repair/filling station was on the west side of the northeast corner of 28th St. and Lake Av. A store and restaurant was also located at the southwest corner of 28th and Lake, and a store occupied the southeast corner of Lake and 28th St.

4.7 History of Property Use

The subject site was platted as Campobello, Block 16, Lot 24 in 6/24/1903. At that time, E. Lake was named Clark Avenue, and 28th Street was named Richmond Avenue. 29th Street was named Campobello Avenue, which contained or was to contain an electric railway. From at least 1951 to at least 1961, Frank's Service Station occupied the site. By 1956, Diner Café was listed at 2630 ½. By 1966 the station was no longer operational, but the site was occupied by Jimmie's Garage (rear area). The restaurant (2630 ½) and the filling station (2630) were listed as vacant. By 1971 the rear area was vacant and another restaurant, Charlie's Chicken (Charles and Frederica Clark) occupied 2630. City street directories indicated the "rear" area was vacant and 2630 ½ was used for storage. By 1976, 2630 was vacant and 2630 ½ was used for storage. However, in 1981 and 1986, Charlie's Restaurant was again shown as occupant of 2630. As of 1992, 2628-2630 were vacant. In 1997, another restaurant occupied 2630 ½, but no occupant was listed for 2630. In 2003, Evelyn Roberts was reported to occupy 2630, with no specific use mentioned in the city street directory volume for that year. As of 2008, 2630 was occupied by Unique Auto Detailing, the current occupant.

4.8 Applicable and User Provided Document Review

Not applicable.

4.9 Physical Setting Sources

4.9.1 Site Topography

LAS reviewed the 7.5-minute USGS topographic map for the “Tampa” quadrangle in which the subject site is located (27082-H4) (drawn in 1956/photo-revised in 1981). “House omission tint” was over the property, representing a primarily residential area. Topography of the study area was “flat.” Historic topographic maps: **1947**—House omission tint over site. **1956, 1969, 1981, 1995**—House omission tint. Church to W. See **Appendix B** (EDM Report) for **USGS topo maps**.

4.9.2 Designated Wetlands

The scope of work for this Phase I ESA did not include a formal wetland delineation. However, the NWI Wetlands Map consulted indicated no wetland feature on the subject site. See **Appendices B** (EDM report) and **E**.

4.9.3 Geotechnical Soils Investigation Reports

Not available.

4.9.4 General Stratigraphy

The stratigraphy and lithology of the upper sediments in the Southwest Florida-Central Florida Groundwater Basin, in which the subject site is located, consists of a sequence of sands, clays, shell beds, sandstone, limestone, and dolomite. The ages of these sediments range from Miocene to recent. The limestone sequence typically associated with the upper Floridan aquifer system is within 20 +/- feet of land surface. See **Appendix E**.

4.9.5 Shallow Soil Survey

The USDA Soil Survey for Hillsborough County indicated Wabasso-Urban Land Complex (No. 58) as the primary soil type. Urban land has been substantially reworked by development. See **Appendix E** for the specific soil map for the property.

4.9.6 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 E** (Florida Geological Survey, Bulletin No. 68, 2008; Plate 13, Cross Section J-J’, W-14668).

4.9.7 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.

4.9.8 On-site Water Well(s)

EDM did not report a water well on the property. LAS did not observe a water well on-site.

4.9.9 Groundwater Depth

The scope of services for this Phase I ESA did not include measurement of the shallow groundwater depth.

4.9.10 Groundwater Flow

Based on available potentiometric and topographic maps, the predicted groundwater flow direction in the Floridan aquifer system is generally to the *south* in the study area. The predicted groundwater flow direction for the surficial aquifer system on-site was not determinable without site-specific groundwater elevation measurements. See **Appendix E**.

5.0 SITE RECONNAISSANCE

5.1 Site Name

Commercial Building (0.11 +/- acres)

5.2 Site Location

2630 E. Lake Avenue (33601)
Tampa, Hillsborough County, Florida

Section 8 of Township 29S, Range 19E

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

5.3 Inspection Date

LAS visited the site on 8/17/17 at approximately 9:00 a.m. Weather was sunny with a temperature of 88°F.

5.4 Site Inspector

Richard C. Reynolds, EP, President

5.5 Site Representatives Present

Mr. John Smith, ABC

Mr. Dave George, Unique Auto Detailing

5.6 Inspection Process and Procedures

LAS walked the subject site with Mr. Smith and Mr. Dave George as escorts. **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.**

5.7 Surface Access and Egress

From E. Lake Avenue to the south. Alley to north. Sidewalk to east. Wall around east, west and north sides of site.

5.8 General Description of Current Improvements and Site Uses

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

The subject building was obviously constructed in the 1950s, and was configured similarly to an old gas station, but had two front entrance doors; the west into the business office, and the east into a vacant restaurant area. The building was surrounded on its east, west and south sides by a concrete block wall. Entrances to the open, partially-covered east and west sides were through locked iron gates. The concrete floor of the rear area of the building was covered with a flat metal roof supported by aluminum posts. In the northwest corner was a concrete pit or vault. Miscellaneous items were observed in the rear of the building, including, but not limited to, exercise equipment, washing machines, bicycles, potted plants, chairs, bench, and dog pen. The area on the east side was a former walk-up window for the restaurant. On the west side of the building were two (2) "tote" containers with car cleaning liquids and other items used in the car detailing business. Inside the office area appeared to be a compressor, that likely was moved outside for use in the business, miscellaneous items, supplies, and a security system. The restaurant had a tiled sit-down area, restrooms, kitchen with range and sink, and supply closet. In the floor outside the kitchen area was a grease trap with steel cover. The rear area may have also been used for restaurant seating at one time (auto repairs were once performed in this area). The concrete pavement in the front of the building was cracked, with some sections revealing an original concrete surface. There were semblances of a previous dispenser island and a port hole filled with soil or concrete. Much of the pavement to the south was new which was apparently in the city's easement (driveway into building and sidewalks—part of a beautification/traffic calming effort on E. Lake Avenue). On the south side of the structure were canopies to shelter the vehicles while detailed.

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

5.9 Specific Site Observations

Site Vegetation	Minimal vegetation on-site.
Surface Water	Not physically or visually observed.
Drainage	To municipal storm water sewers on streets.
Railroad Spurs	Not physically or visually observed.
Utilities, Drains, Vent Pipes, Water Wells, Heating and A/C Systems, and Septic Systems	Municipal utilities were available to the site. Wall A/C unit. No obvious vents pipes associated with fuel tanks were observed. Roof vent. No water well.
Building(s)	See Section 5.8 above.
Heavy Equipment, Tankers or Spray Rigs	Not physically or visually observed.
Unusual Odors	Not detected.
Disturbed Soils	Not physically or visually observed.
Surface Impoundments or Holding Ponds	Not physically or visually observed.
Air Emissions or Wastewater Discharges	Not physically or visually observed.
Industrial or Manufacturing Activities	Not physically or visually observed.
Monitoring Wells or Remedial Activities	Not physically or visually observed.
Stained or Discolored Soil	Not physically or visually observed.
Leachate or Seeps	Not physically or visually observed.
Stressed Vegetation	Not physically or visually observed.
Chemical Spills or Releases	Not physically or visually observed.
Groundwater or Surface Water Contamination	No chemical testing of groundwater was conducted.
Oil or Gas Well Exploration	Not physically or visually observed.
Farm Waste Concerns	Not physically or visually observed.
Evidence of Prolonged Use or Misapplication of Pesticides, Herbicides, or Fertilizers	Not physically or visually observed.
Other Environmentally Suspicious Conditions	Patchy concrete on south side of building.
Discharges, Leachate, Migration, or Run-off from Off-Site Pollution Sources	Not physically or visually observed.

5.10 AST/UST Systems

Not physically or visually observed.

5.11 Transformers and PCB Equipment

Not physically or visually observed.

5.12 Hazardous Substances and Petroleum Products

Not physically or visually observed. However, cleaning fluids were present on-site.

5.13 Drums and Storage Containers

There were several storage containers of different sizes on-site related to the auto detailing business.

5.14 Area Reconnaissance

5.14.1 Description and Contamination Potential of Adjoining Properties

North of the site was an alley and vacant property. Further north was 31st Avenue. South of the property was E. Lake Avenue and the CDC's Youth Center. Southeast of the property was a laundromat reportedly developed by the CDC. East of the site was 29th Street and a soul food store (this was a Texaco station at one time) and some apartments. West of the property was the asphalt-paved parking lot of a Baptist church. The church building was on the adjoining lot further west.

5.14.2 Summary and Discussion

The building to the east, being a former gasoline station, could potentially adversely impact the subject site. See **Section 4.1.2**.

5.14.3 Vapor Migration Potential

LAS uses the basic guidelines in E2600-15 to formally address potential “vapor migration” sources if suspected.

However, to initially screen a site for potential “vapor migration” LAS continues to use the “Buonicore Methodology,”¹¹ which is based on E2600-10, and divides potential contamination sources into three (3) categories: perceived *up-gradient* within 1,760 +/- feet; perceived *cross-gradient* within 365 +/- feet; and perceived *down-gradient* within 100 +/- feet.

Based on EDM regulatory search data, and information obtained by LAS for this Phase I ESA from multiple sources, based on this methodology, LAS did not identify a material vapor migration concern near the subject site, with the possible exception of the former Texaco station site to the east (likely cross-gradient).

The subject site itself, of course, is a historic gas station site.

¹¹Buonicore, A.J., Methodology for Identifying the Area of Concern Around a Property Potentially Impacted by Vapor Migration from Nearby Contaminated Sources, Paper No. 2011-A-301, Proceedings, Air & Waste Management Association, 104th Annual Meeting, Orlando, Florida, June 20-24, 2011.

6.0 INTERVIEWS

6.1.1 Owner

Ms. Annette Brooks
(313) 415-1585

LAS talked to Ms. Annette Brooks and was given the name of Mr. Dave George as the site contact. She reported that he was advised we would be on-site.

6.2 Occupants

LAS talked to Mr. Dave George while on-site 8/17/17.

6.3 Operators

See **Section 6.2**

6.4 Government Officials

LAS checked the on-line files of the Florida Department of Environmental Protection (FDEP) for storage tank facilities and hazardous waste generators, if necessary. LAS also checked the complaint and warning files of the Environmental Protection Commission (EPC) of Hillsborough County. Finally, information on file with the Hillsborough County Property Appraiser (HCPA) was utilized in this report.

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

LAS met ABC's Mr. John Smith while on-site on 8/17/17.

LAS also used knowledge and information culled from many different resources to obtain other historical data about the subject site and the surrounding areas.

7.0 EVALUATION

7.1 Findings (“Environmental” Conditions On-Site)

1. The subject site was formerly used as a filling station and auto repair shop. It is not known if the fuel tanks were removed from this property. It is also possible that fuel and/or waste oil tanks are in more than one location on the site.
2. An UST was discovered in the city of Tampa ROW in front of the abutting church to the west in 2006. A discharge was reported for this tank.
3. A filling station was located adjacent east (Texaco) during the 1960s-1980s.
4. The property was developed before EPA bans were instituted prohibiting use of asbestos fibers in most construction materials (ACM) (a non-scope finding).

7.2 Opinions (correspond to above numbers)

1. Abandoned USTs, if present, could still hold fuel, and could have deteriorated over time and contaminated the soils and groundwater of the subject site. Since the auto repair business may have been a separate operation, with entrance off N. 28th Street to the east, a waste oil UST (or another fuel UST) might have been in use in the rear of the property. **This finding, in our opinion, based on our understanding of the ASTM E 1527-13 definition of a REC, is a REC.**
2. This tank was found, assessed, and properly closed “in-place.” A SRCO was issued by the state. From our review of available regulatory documentation, contamination associated with this tank was inconsequential and reported far enough away from the subject site to pose no material environmental/contamination threat to the property. **This finding is a historical REC according to our understanding of the ASTM E 1527-13 standard. In our opinion, the presence of this former tank near the subject site does not warrant further assessment on the property at this time.**
3. Known storage tanks have been reportedly removed from this site, and the facility is eligible for state-funded petroleum product contamination cleanup. However, the site has a low priority cleanup score in the state’s program, and assessment/remediation efforts appear inactive. Since the tanks have been removed, associated soil and/or groundwater contamination will have improved over time due to natural attenuation. **In our opinion, because of the nature of the site (across street, closed station, passage of time, tanks removed, eligible for state-funded cleanup, etc.), this finding is not a REC.**
4. This is a “non-scope” finding which should be considered a “business environmental risk.” Any application for a demolition or construction permit must be accompanied by a “pre-demolition asbestos survey.” It is possible that special abatement procedures must be followed if ACM are found and the building is demolished or remodeled.

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

No title search was provided to verify previous ownership. No environmental lien search was conducted.

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 **Commercial Building (0.11 +/- Acres)**, located at 2630 E. Lake Avenue, in Tampa, Hillsborough County, Florida, in general conformance with the scope of work and limitations of ASTM E 1527-13.

This assessment has revealed no evidence of RECs, controlled RECs, or historical RECs, in connection with the subject property, *except for:*

Previous use of the subject site as a gasoline filling station and auto repair shop, without indication that the property was assessed for soil and/or groundwater contamination and the tanks were properly removed or closed in-place.

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 in light of the conditions identified and the mitigating factors presented herein.

7.6 Deviations from ASTM E 1527-13

In our opinion, there were no material deviations from ASTM E 1527-13 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 the 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 Statement of Qualifications

See **Appendix H**.

8.0 NON-SCOPE CONSIDERATIONS

8.0 Non –ASTM E 1527-13 Scope Items

The building (1953) was older than when EPA asbestos bans went into effect in the late 1970s. It is important to note that to demolish the current structures, or to renovate them, a “pre-demolition” asbestos survey may be required to obtain a permit through the city.

9.0 APPENDICES