

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Daniel Drive Building (1.2 ± Acres, 20,000 ± SF)
12705 Daniel Drive (33762)
Clearwater, Pinellas County, Florida

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Clearwater, Pinellas County, Florida***

1.0 INTRODUCTION/SUMMARY/FINDINGS/OPINIONS/CONCLUSIONS

1.1 Site Name

Daniel Drive Building (1.2 ± Acres, 20,000 SF)

1.2 Site Location (see **Figure 1 after **Page 12**)**

12705 Daniel Drive (33762)
Clearwater, Pinellas County, Florida

Section

Section 9 of Township 30S, Range 16E

Pinellas County Parcel Number (from Pinellas County Property Appraiser) (www.PCPAfl.org)

09-30-16-20295-000-0010 1.20 ± Acres

1.3 Inspection Date

An environmental professional (EP) from Land Assessment Services, Inc. (LAS) inspected the subject property on 10/24/24 beginning at 1:30 p.m. and concluding at 2:15 p.m. Weather was 82° F under sunny skies.

1.4 Assessment Team

Richard C. Reynolds, EP, President
John W. McMullen, EP, Florida PG (inspector 10/24/24)

1.5 Summary

Site Description (see **Figure 2** after **Page 13**)

The property was a steel metal warehouse building in a light industrial area of Clearwater, Florida. Two tenants occupied the warehouse. The northern half of the building was Seaboard Manufacturing, which produces machine parts for the aircraft industry. Big Storm Brewing Co. was using the southern half of the building for extra storage. Seaboard Manufacturing uses specialized machining equipment to produce aircraft parts. On the warehouse floor were several specialized machining units. During LAS' site visit, the warehouse was dark, and the machines were off. Numerous 55-gallon drums of lubricant used in the machines were observed inside the warehouse and outside the warehouse. LAS also observed inside and outside the warehouse numerous 55-gallon drums and plastic totes full of metal shards, a byproduct of the manufacturing process. In the northeast corner of the warehouse were two stories of office space being used by Seaboard Manufacturing. Big Storm Brewing was storing extra brewing equipment, kegs, kitchen equipment, small propane tanks, wooden casks, and pallets of Big Storm Brewing products. Also inside the southern half of the warehouse was a workout gym and a workshop with hand tools and power tools. On the east side of the warehouse were five (5) large, 10-foot roll-up doors, a parking lot, several cargo trailers, a roll-off dumpster, and a regular dumpster.

Adjoining Properties

North—one rectangular metal building similar to the subject property building with Chris M Electric, LLC, Street Auto Sales, LLC, and Overhead Door Company of Clearwater

South—one rectangular metal building similar to the subject property building with AWS Carpenter Contractors

East—one-story warehouse units for rent, with most appearing to be vacant.

West—Daniel Drive, more light industrial buildings west of Daniel Drive

Brief Site History

The 20,000-square-foot light manufacturing building was constructed in 1975. The site was not developed prior to that time. It seemed to be preceded by farms or rangeland. Rural residential areas were present in the east. Rainbow Graphics appeared to be the first major tenant of the building.

LAS obtained a City Street Directory study for this assessment. According to these records, the subject property was occupied as follows.

1926-27 to 1979—*Street Not Listed*

1985—*Rainbow Graphics (Julius W. Wilson Jr.), 12750b Suncoast Waterbeds*

1989—*Rainbow Graphics, 12750b Vacant*

1997—*Greg L. Stuart*

2000—*Not listed.*

2003—*Cabinet System International*

2008—*LT Revenge LLC (boat building, repairing, manufacturing)*

2012—*LT Revenge LLC*

2016—*Not Listed*

2020—*Not listed*

2023—*Not listed*

According to available aerial images, the subject property and surrounding lands were vacant and rangeland from 1941 until at least 1952. By 1962, the subject property was cleared and appeared as a grassy pasture. Several warehouse-like commercial buildings were along 49th Street, northwest of the subject property. In 1970, the subject property remained grassy pasture. Numerous new commercial buildings were north and northwest of the subject property. By 1980, the subject property appeared to have been developed with a rectangular-shaped warehouse building. According to property records, the building currently on the subject property was constructed in 1975. The 1980 aerial shows the subject property surrounded by commercial warehouse buildings on all sides except to the west, where a narrow grassy area remains. The 1986 aerial showed two new commercial buildings west of the subject property. By 1994, three (3) new commercial buildings were west and northwest of the subject property. Since 1994, no significant obvious changes have occurred on the subject property or in the surrounding area.

Physical Setting

LAS reviewed the subject site area on the USGS topographic map for the “Safety Harbor” quadrangle (27082-H6) published in 1956/photo revised in 1987. A 15’ contour line is drawn west of the subject property, and a 10’ contour is drawn east of the subject property. The area around the subject property is densely populated with rectangular-shaped structures. The subject property is a flat parcel with very little relief. In general, the area slopes gradually downward from west to east. The NWI Wetlands Map did not indicate a wetland on the property.

Groundwater flow direction within the Surficial aquifer system typically follows localized topographical relief patterns. It is not determinable without site-specific testing, which was not included in the scope of this Phase I ESA. However, LAS was able to use site assessments performed for the former Reliable Circuits Upgradient Investigation, which indicated groundwater flow in the surficial aquifer of the subject property to the east-northeast.

Regulatory Records Review

For information on listed facilities, see the EDM and ERIS reports in **Appendix E**. EDM found 71 sites on the regulatory records searched according to the ASTM 1527-21 scope, including the subject *site*.

The subject property was found in the following lists: ECHO, FRS, NONTSD, and STCERC. It is situated in a heavily populated commercial/industrial section of Pinellas County on the east and west side of 49th Street North, south of Ulmerton Road. To characterize the area, there are 33 hazardous waste generators, 18 facilities on the state's contamination cleanup list, and 17 leaking storage tanks within 0.25 miles of the subject property. Of the 71 listed sites, only 30 were shown at a higher elevation. In theory, there is less of a chance that contamination at lower elevations will migrate via groundwater to higher elevations.

The subject property was constructed in 1975. One of its initial tenants was Rainbow Graphics. The name indicates possibly a printing operation. The business notified the EPA/FDEP in 1988 that it was a small quantity generator (SQG) of hazardous wastes, meaning it generated less than 1,000 kg of waste per month, which is consistent with a printing operation. There is another category below that, a "conditionally exempt" SQG of hazardous wastes, which would generate less than 100 kg per month. As of 11/9/92, the business was inspected by the FDEP, which found four (4) RCRA violations.¹ Enforcement followed on 12/22/92, with an FDEP warning letter sent. The matter was closed as of 1/6/93. A follow-up state inspection occurred on 7/5/12, and no "generator" was found on-site. File details relating to Rainbow Graphics were not reasonably ascertainable at this time.

Key Site Representative Interview

While on-site, LAS interacted with building occupants who did not appear to be site owners but workers. We are assuming that the broker and prospective buyer have been in contact with the seller. The User's Questionnaire was not returned to LAS.

Previous Environmental Reports

None provided.

Findings, Opinions, and Conclusions

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

¹ Resource Conservation and Recovery Act (RCRA), enacted in 1976.

1.6 Findings (“Environmental” Conditions On-Site)²

1. The subject building is a commercial/industrial building constructed in 1975. Over nearly 50 years, it has been occupied by a graphics company, a boat builder, a cabinet maker, a machine shop, and a brewery (overflow). At least one of these occupants was a hazardous waste generator, with violations recorded with regulators. It is also generally acknowledged that boat builders typically have to use solvents in their work. Lastly, there is a general threat to the area’s groundwater from dense industrial activity in adjoining areas.
2. A former large quantity generator of hazardous wastes (Reliable Circuit) was present 500 ± feet to the east. A release from this business into the surface waters of a nearby ditch was thought to have threatened the subject site at one time. There is also an ongoing groundwater monitoring program in areas in the vicinity of Reliable Circuit, checking for the presence of vinyl chloride (a chlorinated solvent) in the groundwater.
3. LAS observed 55-gallon drums, totes, and containers of other sizes containing liquids and metals used or generated by the occupants, particularly the machine shop.

1.7 Opinions (correspond to the above numbers)

1. Establishing a baseline regarding groundwater quality on-site is important in order to assess the impacts of long-time commercial/industrial activity on-site and in the region. ***In our opinion, these uses over a protracted timeframe constitute a recognized environmental condition (REC), especially in light of file data indicating poor housekeeping and/or a confirmed release.***³
2. ***See No. 1 above.***
3. ***This is a point of information. The Sunbelt Lubricants used on-site are likely bio-degradable.***

² 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.”

³ 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*.

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 **Daniel Drive Building (1.2 ± Acres)** located at **12705 Daniel Drive**, in **Clearwater, Pinellas 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,⁴ or historical RECs,⁵ in connection with the subject property, except for

1. *Previous on-site concerns, including a possible printing operation with regulatory violations relating to the generation and handling of hazardous wastes, and the potential for solvent use by a past on-site boat builder.*
2. *The ongoing monitoring of solvent groundwater contamination caused by the former Reliable Circuit business located at 12880 Automobile Blvd, Clearwater, Fl 33520, to the east. The subject property was also part of a previous “migration” study of a contaminant release from Reliable Circuit into surface water (a ditch) that borders the subject property to the north.*

These general factors have called into question the status of the subject property’s underlying shallow groundwater, which would be susceptible to these activities. In our opinion, this is a Recognized Environmental Condition (REC). In the absence of site-specific groundwater data, LAS cannot determine that no RECs have occurred from these sources/activities.

It is important to understand that the sheer number of regulatory-listed sites in the vicinity of the site would require exhaustive study, which cannot be justified in the context of “time is of the essence” and a limited budget for the work.

It is also important to note that drums and other fluid containers were noted in the building. These must be properly and carefully moved prior to closing.

1.9 Summary—Conditions for Use

The users of this report should understand that this summary ***does not contain all the information 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. ***Important issues, however, have been brought forward regarding RECs and significant data gaps.***

⁴ Recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations).

⁵ 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.***

2.0 INTRODUCTION

This report is intended exclusively and solely for the use and benefit of ____, or his assigns, subject to the terms, conditions, and limitations found herein and the scope of services and cost proposal dated 10/14/24, which was accepted by the user on 10/16/24. Therefore, its contents should not be relied upon by any other parties without LAS and its client's express prior written consent. In no event and under no circumstances will LAS have any duty, 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*⁶ 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*.⁷ 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 an 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 per 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 all the appropriate inquiry provisions of the *LLPs* alluded to herein. *Users* are cautioned that federal, state, and local laws may impose environmental assessment obligations beyond this practice's scope. *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 it approves 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.

⁶ See **Appendix A** for ASTM Standard of Practice E1527-21 “terminology.”

⁷ 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 outlined 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)⁸ 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 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 fieldwork, 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 we completed 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. Prior to use, it is the responsibility of the user to establish appropriate safety and health practices and determine the applicability of regulatory limitations.

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 that the document has only been approved through the ASTM consensus process.

⁸ 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 to 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 covenants 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 the 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 the *user*’s *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 evaluate the *land title records* or the *user's* conclusions regarding 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 *releases*. 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* knows of any environmental lien or *AULs* encumbering the subject property or related to it, the *user* should communicate such information to the environmental professional 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 subject property's purchase price to the subject property's fair market value 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 that does not reasonably reflect fair market value if the subject property was not contaminated and make a written record of such an 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 a real estate appraisal to ascertain the subject property's fair market value. 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

The *user* must consider common or reasonably ascertainable information within the local community about the subject property. 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 them by *appropriate investigation*, including the information collected under the E1527-21 standard of practice.

2.4.8 Other

Either the *user* shall tell 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)

The User Questionnaire was not returned completed. Answers included herein are based on conversations with the client/user and/or his broker.

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

The client/user did not provide a current title search for reviewing matters of public record, such as environmental liens.

3.2 Specialized Knowledge or Experience of the User

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

3.3 Actual Knowledge of the User

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

3.4 Reason for Significantly Lower Purchase Price

The client/user did not report or explain any property value reduction to LAS due to contamination.

3.5 Commonly Known or Reasonably Ascertainable Information

LAS conducted inquiries with knowledgeable parties or performed research on the subject area. See **Section 6.0**. *However, if information in provided reports or other reasonably ascertainable sources was sufficient, interviews were not conducted or limited.*

3.6 Degree of Obviousness

The 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 conducting “due diligence” for a pending transaction on the subject property.

3.8 User-Provided Environmental Reports

Not provided.

4.0 SITE RECONNAISSANCE

4.1 Site Name

Daniel Drive Building (1.2 ± Acres, 20,000 SF)

4.2 Site Location

12705 Daniel Drive (33762)
Clearwater, Pinellas County, Florida

Section

Section 9 of Township 30S, Range 16E

Pinellas County Parcel Number (from Pinellas County Property Appraiser) (www.PCPAfl.org)

09-30-16-20295-000-0010 1.20 ± Acres

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

4.3 Inspection Date

An environmental professional (EP) from Land Assessment Services, Inc. (LAS) inspected the subject property on 10/24/24 beginning at 1:30 p.m. and concluding at 2:15 p.m. Weather was 82° F under sunny skies.

4.4 Site Inspector

John McMullen, EP, PG (10/24/24)

4.5 Site Representative(s) Present

One unnamed employee from Big Storm Brewing was present and let LAS inside the building. One employee, named Mackie, from Seaboard Manufacturing, was present.

4.6 Inspection Process and Procedures

The site was accessed from Daniel Drive. LAS walked the subject property and took photos.

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

4.7 Surface Access and Egress

The subject site was accessible from Daniel Drive to the west.

4.8 Narrative Description of Current Improvements and Site Uses

See **Site Photographs** in **Appendix B**.

The property was a steel metal warehouse building in a light industrial area of Clearwater, Florida. Two tenants occupied the warehouse. The northern half of the building was Seaboard Manufacturing, which produces machine parts for the aircraft industry. Big Storm Brewing Co. was using the southern half of the building for extra storage. Seaboard Manufacturing uses specialized machining equipment to produce aircraft parts. On the warehouse floor were several specialized machining units. During LAS' site visit, the warehouse was dark, and the machines were off. Numerous 55-gallon drums of lubricant used in the machines were observed inside the warehouse and outside the warehouse. LAS also observed inside and outside the warehouse numerous 55-gallon drums and plastic totes full of metal shards, a byproduct of the manufacturing process. In the northeast corner of the warehouse were two stories of office space being used by Seaboard Manufacturing. Big Storm Brewing was storing extra brewing equipment, kegs, kitchen equipment, small propane tanks, wooden casks, and pallets of Big Storm Brewing products. Also inside the southern half of the warehouse was a workout gym and a workshop with hand tools and power tools. On the east side of the warehouse were five (5) large, 10-foot roll-up doors, a parking lot, several cargo trailers, a roll-off dumpster, and a regular dumpster.

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

Not physically or visually observed.

4.11 Hazardous Substances and Petroleum Products

Numerous 55-gallon drums of industrial lubricant from Sunbelt Lubricants, Inc. See information on Sunbelt Lubricants in the **Appendix**.

4.12 Drums and Storage Containers

Numerous 55-gallon drums of industrial lubricant from Sunbelt Lubricants, Inc.

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

<i>Site Vegetation</i>	Grass
<i>Surface Water</i>	Not physically or visually observed.
<i>Drainage</i>	Via storm drains along the roadway to an unknown retention area.
<i>Railroad Spurs</i>	Not physically or visually observed.
<i>Utilities, Drains, Vent Pipes, Water Wells, Heating and A/C Systems, Septic Systems</i>	Sewer and water utilities are available at the site.
<i>Building(s)</i>	Metal warehouse building on-site.
<i>Heavy Equipment, Tankers or Spray Rigs</i>	Propane-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 Wastewater Discharges</i>	Not physically or visually observed.
<i>Industrial or Manufacturing Activities</i>	The northern half of the warehouse was a machine shop, manufacturing metal parts for aircraft.
<i>Monitoring Wells or Remedial Activities</i>	Not physically or visually observed.
<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 Waste 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>	Numerous containers (55-gallon drums and plastic totes) contain metal shards, a byproduct of manufacturing aircraft parts.
<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

Adjoining Properties

North—one rectangular metal building similar to the subject property building with Chris M Electric, LLC, Street Auto Sales, LLC, and Overhead Door Company of Clearwater

South—one rectangular metal building similar to the subject property building with AWS Carpenter Contractors

East—one-story warehouse units for rent, with most appearing to be vacant

West—Daniel Drive, more light industrial buildings west of Daniel Drive

4.14.2 Summary and Discussion

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

4.14.3 Vapor Encroachment

LAS refers to the 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. Our cursory review aims to determine whether a VES should be conducted as a separate environmental study in addition to or in addition to 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 outlined 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 the default *area of concern* (AOC) per ASTM E2600-15.

The environmental professional may expand or reduce the default AOC (adjusted AOC) using experience or 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.

Based on the above parameters, existing regulatory reporting, and our professional judgment, a separate VES is not necessary to complement this Phase I ESA for due diligence purposes. It is important to note that the reported contaminant in the groundwater area was a degraded solvent.

5.0 RECORDS REVIEW

5.1 Physical Setting Sources

5.1.1 Site Topography

LAS reviewed the subject site area on the USGS topographic map for the “Safety Harbor” quadrangle (27082-H6) published in 1956/photo revised in 1987. A 15’ contour line is drawn west of the subject property, and a 10’ contour is drawn east of the subject property. The area around the subject property is densely populated with rectangular-shaped structures. The subject property is a flat parcel with very little relief. In general, the area slopes gradually downward from west to east.

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 a wetland on the property.

5.1.3 Geotechnical Soils Investigation Reports

Not provided.

5.1.4 General Stratigraphy

(Florida Geological Survey, Bulletin No. 68, 2008; Plate 31, Cross Section BB-BB’, W-16197).

The site is in the Gulf Coastal Lowlands region of west central Florida (White, 1970; Puri and Vernon, 1964). Generally, the stratigraphy and lithology of the upper sediments in the Gulf Coastal Lowlands region consists of a sequence of sands, clays, shell beds, sandstone, limestone, and dolomite. Pliocene to recent age sands of variable thickness overlies Tertiary carbonates and clays. Free of deformation, the region’s stratigraphic elements increase in age with depth. In and around the site, Pleistocene to Recent shallow sediments are primarily undifferentiated sands and silts extending approximately 50’-75’ below land surface (BLS). The silt and clay content of these sands increases with depth. The surficial sediments comprise the unconfined surficial aquifer. Underlying the surficial sediments is the Hawthorn Formation, consisting of clay, sand, and limestone lenses, with the limestone typically occurring towards the bottom of the formation. The Hawthorne Group Formation, with an approximate thickness of 100’, forms an intermediate confining unit of low permeability between the unconfined shallow aquifer and the deeper Floridan Aquifer System. At the southern end of Pinellas County, the Hawthorn Group is replaced by the Arcadia Formation. Underlying the Hawthorne Formation is the beginning of the Florida Aquifer System with the Tampa Member of the Arcadia Formation, with an approximate thickness of 150’. Underlying the Tampa Member of the Arcadia Formation is a limestone sequence from the Suwannee, Ocala, and Avon Park encountered with depth. See **Appendix C** for specific geological information on the property.

5.1.5 Shallow Soil Survey

The USDA Soil Survey for Pinellas County indicated one (1) primary soil type for the subject site:

17—Myakka soils and Urban land

Setting

Landscape: Lower Coastal Plain

Landform: Flatwoods

Shape of areas: Irregular

Size of areas: 10 to 250 acres

Composition

Myakka and similar soils: 25 to 65 percent Urban land: 35 to 75 percent

Dissimilar soils: 5 percent

Urban land consists of high-density residential developments, commercial buildings, streets, highways, parking lots, and other types of impervious ground cover. The areas of Myakka soil that are not covered by impervious material are too small to be delineated separately at the scale of mapping and are mostly grassy areas. The Urban land dominates this map unit, except for a small area that remains in native condition in the northeast corner of the county.

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 31, Cross Section BB-BB', W-16197).

5.1.7 Primary and Secondary Aquifers

According to SWFWMD maps and other hydrogeological information, three (3) primary aquifer systems may be present in the study area: the surficial aquifer system, the intermediate aquifer system/confining unit, and the Upper Floridan aquifer system.

5.1.8 On-site Water Wells

None observed. EDM/ERIS data did not report a permitted water well on the subject site. See **Appendix E**.

5.1.9 Groundwater Depth

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

5.1.10 Groundwater Flow

Groundwater flow direction within the Surficial aquifer system typically follows localized topographical relief patterns. It is not determinable without site-specific testing, which was not included in the scope of this Phase I ESA.

However, LAS was able to use site assessments performed for the former Reliable Circuit Upgradient Investigation, which indicated that groundwater flow in the surficial aquifer around the subject property was to the east-northeast. See **Appendix E**.

Based on available potentiometric maps, the groundwater flow direction in the Upper Floridan aquifer system was generally to the *west* (see **Appendix C**).

5.2 Review of Aerial Photographs

5.2.1 Summary of Selected Historical Aerial Photographs⁹

According to available aerial images, the subject property and surrounding lands were vacant and rangeland from 1941 until at least 1952. By 1962, the subject property was cleared and appeared as a grassy pasture. Several warehouse-like commercial buildings were along 49th Street, northwest of the subject property. In 1970, the subject property remained grassy pasture. Numerous new commercial buildings were north and northwest of the subject property. By 1980, the subject property appeared to have been developed with a rectangular-shaped warehouse building. According to property records, the building currently on the subject property was constructed in 1975. The 1980 aerial shows the subject property surrounded by commercial warehouse buildings on all sides except to the west, where a narrow grassy area remains. The 1986 aerial showed two new commercial buildings west of the subject property. By 1994, three (3) new commercial buildings were west and northwest of the subject property. Since 1994, no significant obvious changes have occurred on the subject property or in the surrounding area.

5.2.2 Aerial Photographs Provided

See **Figures 1** and **2** for current aerial photographs and **Appendix D** for historical aerials—aerial photographs obtained from LAS archives and Google Earth.

⁹ This section is a *summary* of our observations from a review of reasonably ascertainable historical aerial images. 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 Directories¹⁰

LAS obtained a City Street Directory study from ERIS. Five (5) year intervals were generally checked (see **Appendix D** for the ERIS report). LAS focused on Daniel Drive.

Subject Property, see Appendix D for surrounding properties.

1926-27 to 1979—Street Not Listed

1985—Rainbow Graphics (Julius W. Wilson Jr.), 12750b Suncoast Waterbeds

1989—Rainbow Graphics, 12750b Vacant

1997—Greg L. Stuart

2000—Not listed.

2003—Cabinet System International

2008—LT Revenge LLC (boat building, repairing, manufacturing)

2012—LT Revenge LLC

2016—Not Listed

2020—Not listed

2023—Not listed

5.4 Sanborn Fire Insurance Maps

LAS ordered Sanborn® fire insurance maps from ERIS for this assessment. ERIS reported that no information was found for this site or adjacent properties. No maps are available for this area. See **Appendix D**.

5.5 Historical Topographic Maps

Historic USGS topographic maps (Safety Harbor quad map) indicate the subject property as non-wooded vacant land with unimproved trails north, west, and east of the subject property in 1943 and 1952. The 1956 topographic map depicts the subject property as vacant land with wooded areas to the west, north, and east. Ulmerton Road and 49th Street North are shown as improved roadways. In the 1969 map, the subject property remains vacant land. Numerous large commercial structures are depicted north and west of the subject property. Numerous structures are shown northeast of the subject property. The 1981 and 1987 topographic maps show the subject property with a rectangular-shaped structure present. Daniel Drive is west of the subject property. The subject property is surrounded by rectangular-shaped structures similar to the subject property. The 1998 topographic map is similar to the 1981 and 1987 maps, except structures are not shown on the 1998 map.

5.6 History of Property Use

The building was built in 1975. Its occupants have included, but are not limited to, a graphics company, possibly a cabinet maker, a boat builder, a machine shop, and an overflow warehouse for a brewery located elsewhere in the industrial park. Prior to development, it was vacant land.

¹⁰ 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, 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.

5.7 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 a 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).

ENVIRONMENTAL REGULATORY LISTINGS	SEARCH DISTANCES (IN MILES)	NUMBER OF SITES FOUND RECORDED BY EDM
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	1
Archived CERCLIS Sites (NFRAP)	0.50	1
Emergency Response Notification System List (ERNS)	0.25	1
RCRIS Handlers with Corrective Action (CORRACTS)	1.00	1
RCRA-Treatment, Storage and/or Disposal Sites (TSD)	1.00	2
RCRA-LQG, SQG, CESQG and Transporters (NONTSD)	0.25	34
Tribal Tanks List (TRIBALTANKS)	0.25	0
Tribal LUST List (TRIBALLUST)	0.50	0
Brownfields Management System (USBRWNFLDS)	0.50	1
US Institutional and/or Engineering Controls (USINSTENG)	0.25	0
NPL Liens List (NPLLIENS)	1.00	0
Enforcement and Compliance History (ECHO)	0.25	42
FDEP DATABASES		
State NPL Equivalents (STNPL)	1.00	2
State CERCLIS Equivalents (STCERC)	0.50	18
Solid Waste Facilities List (SLDWST)	0.50	9
Leaking Underground Storage Tanks List (LUST)	0.50	23
Underground/Aboveground Storage Tanks (TANKS)	0.25	17
State Designated Brownfields (BRWNFLDS)	0.50	1
State Voluntary Cleanup (VOLCLNUP)	0.50	11
State Institutional/ Engineering Controls Registry (INSTENG)	0.25	0
State Dry Cleaners (DRY)	0.50	0
SUPPLEMENTAL DATABASES		
Facility Registry System (FRS)	0.25	73
Toxic Release Inventory System (TRIS)	0.25	5

5.7.2 Summary and Discussion

For information on listed facilities, see the EDM and ERIS reports in **Appendix E**. EDM found 71 sites on regulatory records searched according to the ASTM 1527-21 scope, including the subject *site*.

The subject property was found in the following lists: ECHO, FRS, NONTSD, and STCERC. It is situated in a heavily populated commercial/industrial section of Pinellas County on the east and west side of 49th Street North, south of Ulmerton Road. To characterize the area, there are 33 hazardous waste generators, 18 facilities on the state's contamination cleanup list, and 17 leaking storage tanks within 0.25 miles of the subject property. Of the 71 listed sites, only 30 were shown at a higher elevation. In theory, there is less of a chance that contamination at lower elevations will migrate via groundwater to higher elevations.

The subject property was constructed in 1975. One of its initial tenants was Rainbow Graphics. The name indicates possibly a printing operation. The business notified the EPA/FDEP in 1988 that it was a small quantity generator (SQG) of hazardous wastes, meaning it generated less than 1,000 kg of waste per month, which is consistent with a printing operation. Another category below is a "conditionally exempt" SQG of hazardous wastes, which would generate less than 100 kg per month. As of 11/9/92, the business was inspected by the FDEP, which found four (4) RCRA violations.¹¹ Enforcement followed on 12/22/92, with an FDEP warning letter sent. The matter was closed as of 1/6/93. A follow-up state inspection occurred on 7/5/12, and no "generator" was found on-site. File details relating to Rainbow Graphics were not reasonably ascertainable at this time.

Because of the sheer volume of sites listed, LAS will not summarize each here. EDM provides the data with summaries in **Appendix E**. LAS also acquired data on the subject property in accordance with ASTM E1527-21 from ERIS, which was part of a data package including aerial images, city street directory information, and geological data.

In the body of this report, LAS will discuss *upgradient and downgradient facilities within 0.10 miles of the subject property*. See below.

EDM NO. 2—FLR000014902 AMERICAN MARINE COMPOSITE 12855 B DANIEL DR CLEARWATER, FL 33762. HIGHER.

This facility was inspected on 3/27/96 and deemed a CESQG. No violations were reported, and no data was available on file.

EDM NO. 3—FLD020973756 PROFESSIONAL BUSINESS PRINTING 4745 126TH AVE N CLEARWATER, FL 33762-4708. LOWER.

This facility was 150 ± feet to the southeast. It appeared to be operational in 1983, but no information is available on the company or its operations.

EDM NO. 4—FLD10755518 WESTCOAST LINENS 4711 126TH AVE N CLEARWATER, FL 33762-4739. LOWER.

¹¹ Resource Conservation and Recovery Act (RCRA), enacted in 1976.

Located 316 feet to the southeast at a lower elevation, Westcoast had a waste stream, including chlorinated solvents, as of 11/23/87. As of 2012, the business appeared to be non-operational. It notified the responsible agencies as an SQG. No violations were indicated.

EDM NO. 5—110070299652 BIG STORM BREWING CO. 12707 49TH ST. N CLEARWATER, FL 33762. HIGHER.

This listing was due to entry into the OSHA database. This was as of 2018.

EDM NO. 6—FLT060076569 CONTROLLED RELEASE TECHNOLOGIES 12745 49TH ST N CLEARWATER, FL 33762-4604. HIGHER.

EPA inspection dated 1/17/2006 indicated that the company was a CESQG. There were no violations listed.

EDM NO. 7—FLD067239103 WATKINS YACHTS INC 12645 49TH ST N CLEARWATER, FL 33762-4600. HIGHER.

As of 8/11/14, by inspection, the facility was not a generator. As of 5/11/90, by notification, the company was an SQG. Two violations were found as of 1986, resulting in an FDEP warning letter, which was cleared by 1987.

EDM NO. 8—FLTMP9404962 WASTE MANAGEMENT 12700 AUTOMOBILE BLVD. PINELLAS PARK, FL 33520. LOWER.

This facility is/was 475 ± feet from the subject site. As of 1994, the EPA indicated that it was a CESQG. No violations were reported.

EDM NO. 9—FLR000014894 EVELAND BROTHERS INC 12790 AUTOMOBILE BLVD CLEARWATER, FL 33762-4719. LOWER.

As of 1996, the facility was a CESQG. Three (3) violations were found at that time, resulting in an FDEP warning letter. The violations appeared to be quickly cleared.

EDM NO. 10—FLD982117004 POLYMATICS PLASTIC PROCESSING 12650 AUTOMOBILE BLVD CLEARWATER, FL 33762-4717. LOWER.

As of 2010, the company was a CESQG; by 2012, it was not a generator. Two violations were reported in 2010, but no data regarding their resolution were available. The earliest entry was in 1987.

EDM NO. 11—536342 UNKNOWN SHEEN INCIDENT 12995 DANIELS DR. CLEARWATER, FL. HIGHER.

This apparent release drainage ditch 475 ± feet to the north occurred in 2000. It appeared to be an oily substance.

EDM NO. 12—FLD096597711 RELIABLE CIRCUIT SYSTEMS, INC 12880 AUTOMOBILE BLVD CLEARWATER, FL 33520. LOWER.

528 ± feet northeast. Discovery of a release occurred in 1987. Solvents used on the property. As of 1996, numerous violations. FDEP warning letters. FDEP consent order. As of 2024, 3 of 5 state

monitoring wells (not on site) still have vinyl chloride above the state's maximum level of 1 part per billion.

5.7.3 Other Regulatory Federal and/or State Records Reviewed

LAS checked the appropriate Florida Department of Environmental Protection (FDEP) Oculus website files¹² for the subject facility and certain nearby listed facilities. These included, but were not limited to, storage tank facilities, hazardous waste generators, landfills, cattle dip vat locations, and waste cleanup sites. ***The known regulatory listings from the EDM report contain links to state databases, which have been checked where appropriate and functional. See Appendix E.***

5.8 Tribal Lands Records Review

LAS checked a map of tribal lands in Pinellas County, and the subject site was not near property controlled by tribal interests. (Nearest Tribal interest >20 miles to NE)

¹² <http://dwmedms.dep.state.fl.us/Oculus/servlet/login>

5.9 Local Governmental Agency Records Review

5.9.1 Pinellas County Property Appraiser

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

<i>PHYSICAL ADDRESS/ PARCEL ID NO./ PROPERTY USE/ ZONING</i>	<i>OWNER</i>	<i>AC. ±</i>	<i>BUILDING CONSTRUCTED</i>	<i>ACQUIRED (BASED ON DEED)</i>
12705 DANIEL DR CLEARWATER, FL 33762 (Unincorporated) 09-30-16-20295-000-0010 4800 GENERAL WAREHOUSE	PROPERTYCRAFT ENTERPRISES LLC 12707 49TH ST N STE 300 CLEARWATER, FL 33762- 4609	1.2 ± ACRES	1975	3/14/16

5.9.1.1 Legal Description

DANIEL'S INDUSTRIAL PARK N 312FT OF LOT 1 & THAT PT LOT 13 PINELLAS GROVES ALL DESC IN SEC 09-30-16 BEG NE COR OF SD LOT 1 FOR POB TH S00D07'30" W 312F.

See **Appendix F**.

5.9.1.2 Property Size

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

5.9.1.3 Zoning/Use

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

5.9.1.4 Current Ownership Information

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

5.9.1.5 Prior Ownership Records Review

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

<i>AVAILABLE DEEDS</i>		
<i>PARCEL ID NO. 09-30-16-20295-000-0010</i>		
	<i>FROM</i>	<i>TO</i>
3/15/2016	SPIRIT REAL ESTATE CORPORATION	PROPERTYCRAFT ENTERPRISES LLC
3/13/2001	SOUTHTRUST BANK, N.A. versus RAINBOW GRAPHICS, INC.	SPIRIT REAL ESTATE CORPORATION
7/28/1983	GROVER E. DANIEL, married	JULIUS WINFIELD WILSON, JR.

6.0 INTERVIEWS

6.1 Owner

Not consulted. The client/user did not return the questionnaire. Basic information from the client/user and broker.

6.2 Occupants

LAS talked briefly with a worker on-site.

6.3 Operator

See **Section 6.1**.

6.4 Government Officials

LAS checked the online files of the Florida Department of Environmental Protection (FDEP) for storage tank facilities, waste cleanup sites, cattle dip vats, landfills, and hazardous waste generators. LAS also checked information on file with the Pinellas County Property Appraiser (PCPA), which was utilized in this report.¹³

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

LAS consulted other reasonably ascertainable information to learn about the history of the site, surrounding areas, and previous owners, if necessary.¹⁴ LAS possessed a base amount of information on the industrial area dating back to the late 1970s.

¹³ Other government agencies, including fire departments, are only contacted if a material issue is discovered that requires elaboration, confirmation, or clarification.

¹⁴ 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 33 years in the region, and a body of general knowledge has been acquired/compiled in 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.

7.0 EVALUATION

7.1 Findings (“Environmental” Conditions On-Site)

1. The subject building is a commercial/industrial building constructed in 1975. Over nearly 50 years, it has been occupied by a graphics company, a boat builder, a cabinet maker, a machine shop, and a brewery (overflow). At least one of these occupants was a hazardous waste generator, with violations recorded with regulators. It is also generally acknowledged that boat builders typically have to use solvents in their work. Lastly, there is a general threat to the area’s groundwater from dense industrial activity in adjoining areas.
2. A former large quantity generator of hazardous wastes (Reliable Circuit) was present 500 ± feet to the east. A release from this business into the surface waters of a nearby ditch was thought to have threatened the subject site at one time. There is also an ongoing groundwater monitoring program in areas in the vicinity of Reliable Circuit, checking for the presence of vinyl chloride (a chlorinated solvent) in the groundwater.
3. LAS observed 55-gallon drums, totes, and containers of other sizes containing liquids and metals used or generated by the occupants, particularly the machine shop.

7.2 Opinions (correspond to the above numbers)

1. Establishing a baseline regarding groundwater quality on-site is important in order to assess the impacts of long-time commercial/industrial activity on-site and in the region. ***In our opinion, these uses over a protracted timeframe constitute a recognized environmental condition (REC), especially in light of file data indicating poor housekeeping and/or a confirmed release.***
2. ***See No. 1 above.***
3. ***This is a point of information. The Sunbelt Lubricants used on-site are likely biodegradable.***

The client/user should carefully consider the conditions described and discussed above as they carry various levels of *business environmental risk (BER)*. Many factors/risks that LAS might not consider in its own opinion and interpretation material enough to rise to the level of a REC, CREC, or HREC may be reason enough for the client/user, considering its intentions and objectives for the site, risk posture, legal issues, lender requirements, and/or any number of other economic and financial considerations, to proceed with further assessment and/or subsurface testing.

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

In our opinion, not required.

7.4 Data Gaps

No material “data gaps” were encountered during the completion of this Phase I ESA. See **Section 7.5**.

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 **Daniel Drive Building (1.2 ± Acres)** located at **12705 Daniel Drive**, in **Clearwater, Pinellas 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, except for

1. *Previous on-site concerns, including a possible printing operation with regulatory violations relating to the generation and handling of hazardous wastes, and the potential for solvent use by a past on-site boat builder.*
2. *The ongoing monitoring of solvent groundwater contamination caused by the former Reliable Circuit business located at 12880 Automobile Blvd, Clearwater, Fl 33520, to the east. The subject property was also part of a previous “migration” study of a contaminant release from Reliable Circuit into surface water (a ditch) that borders the subject property to the north.*

These general factors have called into question the status of the subject property’s underlying shallow groundwater, which would be susceptible to these activities. In our opinion, this is a Recognized Environmental Condition (REC). In the absence of site-specific groundwater data, LAS cannot determine that no RECs have occurred from these sources/activities.

It is important to understand that the sheer number of regulatory-listed sites in the vicinity of the site would require exhaustive study, which cannot be justified in the context of “time is of the essence” and a limited budget for the work.

It is also important to note that drums and other fluid containers were noted in the building. These must be properly and carefully moved prior to closing.

Considering and weighing the opinions preceding Section 7.2 when evaluating the RECs (or CRECS or HRECS) listed above or excluding a particular environmental finding as a REC, CREC, or HREC is important. 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

There were no *material* deviations from ASTM E1527-21 in this Phase I ESA report. Some data may not have been mentioned in the summary report, but has been provided in the **Appendix**.

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 conforming to the standards and practices outlined 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-SCOPE CONSIDERATIONS

Not Applicable. No asbestos testing was performed.

9.0 APPENDICES

See Attached.