

# Phase I ESA Review

**Subject Property:**  
**Main Street, Anytown, CA 95112-2704**

## Engaged By:

<b>Client Name:</b>	<b>Client Contact</b>
<b>Client Company:</b>	<b>Client Company</b>
<b>Client Address:</b>	<b>100 Other Street, Chicago, IL 60604</b>
<b>Order Number:</b>	<b>SAM-23A-38-001</b>
<b>Date of Engagement:</b>	<b>February 10, 2023</b>
<b>Report Date:</b>	<b>February 23, 2023</b>

February 23, 2023

Date: February 23, 2023

Client Contact  
President  
Client Company  
100 Other Street  
Chicago, IL 60604

Dear Client Contact,

CREtelligent was contracted by you on behalf of Client Company (herein referred to as the “Client”) to conduct a review of the Phase I Environmental Site Assessment (ESA) report performed by AEI Consultants (AEI), Project #473364, dated January 3, 2023 on a Commercial Property located at Main Street, Anytown, CA 95112-2704 (herein referred to as the “subject property”). CREtelligent received written authorization from the Client on February 10, 2023 to perform the review.

We appreciate your business. If you have any questions regarding the attached report, or if we can be of any further service to you, please do not hesitate to contact us at (866) 901-7201.

Sincerely,

Ben Larkin  
Client Success Manager  
Direct Line: (866) 901-7201 ext. 111  
b.larkin@CREtelligent.com

## 1.0 PURPOSE

The purpose of this review is to determine if the ESA provided by the Client meets the American Society for Testing and Materials, Standard E1527-21 “Standard Practice for Phase I Environment Site Assessments”, properly identified Recognized Environmental Conditions (RECs) (if present), and makes appropriate recommendations (as needed).

## 2.0 CLIENT PROVIDED ESA OVERVIEW

Overall, the ESA provided by the Client meets the ASTM E1527-21 standards. Excerpted overview from the Findings, Conclusion, and Recommendation of the ESA is as follows:

### 2.1 Subject Property Information

The property is currently used as multi-tenant commercial space. Historical property uses included agricultural land until 1965, then a commercial building from 1966 to present.

Numer of parcels:	One
Assessor Parcel Number (APN):	237-13-101
Subject Property Acreage:	0.79
Number of buildings:	One
Total Building Square Footage:	16,750
Site Assessment Conducted On:	December 28, 2022 by an AEI Consultants representative
Current Operations:	Machine shop, special needs offices, and an auto body shop
First Developed:	1966

### 2.2 Findings of the ESA

The assessment revealed:

- No Controlled Recognized Environmental Conditions (CRECs),
- No Business Environmental Risks (BER),
- No De Minimis Conditions,
- No Historical Recognized Environmental Conditions (HRECs) and
- No significant data gaps.
- AEI identified the following Recognized Environmental Conditions (RECs):
  - A closed LUST Spills, Leaks, Investigation, and Cleanup (SLIC) site with case closed date of 04/13/2009. The Closure letter or the SLIC case, prepared by the SF Bay State Water Resource Control Board (SWRCB) and dated April 14, 2005, stated relatively low concentrations of volatile organic compounds detected in soil and groundwater were below the regulatory cleanup goals at the

time of closure and do not represent a significant threat to human health or the environment. However, the maximum reported tetrachloroethylene (PCE) in groundwater at 2.7 u/L in 2009 exceeds the current SCWRB Tier 1 Environmental Screening Level (ESL) of 0.64 ug/l and approaches the industrial vapor intrusion concern ESL of 2.8 u/L. Chlorinated solvents, such as PCE, are highly mobile chemicals that can easily accumulate in soil and soil gas and migrate to groundwater beneath a facility. Based on this information, the reported presence of PCE in the subsurface constitutes a REC for the subject property.

- A SWEEPS UST listing associated with the subject property listed a 5,000-gallon gasoline UST. AEI attempted to gain more information regarding the operation and/or the removal of the UST but was unable to find any information. Based on the unknown disposition of the UST and the absence of data confirming whether a release had occurred following removal of any USTs, the listing and potential pretense of a UST on the subject property constitutes a REC.
- Site reconnaissance of Neodora LLC work area showed evidence of staining associated with leakage from containers. Two floor drains were observed within the manufacturing welding area. The floor drains represent a potential conduit to the subsurface, given the documented use of hazardous chemicals on the subject property the presence of interior floor drains represents as a REC.
- AEI Identified the following Other Environmental Considerations (OECs):
  - The subject property was historically used for agricultural purposes. There is a potential that agricultural chemicals, such as pesticides, herbicides and fertilizers, were used on site. AEI stated "the subject property is developed and used for commercial/light industrial purposes and thus no further action related to the former agricultural use of the subject property is warranted at this time."
  - Due to the age of the subject property building, there is a potential that LBP is present. During the site inspection, damaged painted surfaces were observed in the building.
  - Due to the age of the subject property building, there is a potential that ACMs are present. The observed suspect ACMs at the subject property were in good condition at the time of the site reconnaissance and are not expected to pose a health and safety concern to the occupants of the subject property at this time. Based on the potential presence of ACMs, AEI recommends the implementation of an O&M Plan which stipulates that the repair and maintenance of damaged materials should be performed to protect the health and safety of the building occupants.

## 2.3 Conclusion and Recommendation of the ESA

The Phase I ESA revealed three RECs in connection with the subject property, related to a historical UST listing with unknown disposition, volatile organic compounds contamination in the soil and groundwater that may exceed today's regulatory clean up limits, and interior floor drains within an area of hazardous chemical use with observed floor staining.

AEI recommended the following:

- Further assessment required for potential on-site USTs in the form of a geophysical survey (including ground penetrating radar [GPR]) followed by a subsurface investigation;
- Further assessment required to evaluate current subsurface vapor concentrations relating to closed SLIC case, including PCE, for comparison to newer SWRCB screening levels; and
- Further assessment required of the drains within welding shop to evaluate the potential for a release in these areas.

### 3.0 CRETELLIGENT COMMENTS AND RECOMMENDATIONS

Per CREtelligent's review of the ESA, the following comments and/or recommendations are provided for the Client's consideration:

- The ESA was prepared by a qualified Environmental Professional in a manner consistent with ASTM Standards.
- A reliance letter should be obtained from AEI because the report was not addressed to Trio Tool & Die Company Inc.
- CREtelligent agrees with the findings and conclusions presented in the ESA and **concurs with the recommended additional assessment.**

#### 4.0 REVIEW LIMITATIONS

To accurately represent the services performed for this Review and Opinion, CREtelligent notes that it does not and cannot represent that the subject property does not contain hazardous materials, products, and/or other latent conditions beyond the Scope of Work for this Review and Opinion and no other warranties, either expressed or implied, apply to the Review and Opinion. CREtelligent cannot warrant the accuracy of prior reports and/or services performed by other firms at the subject property. The Review and Opinion referenced herein is based upon a Client provided ESA that was conducted on the subject property. This review does not account for changes that have occurred in property use or conditions since the time the ESA was prepared.

This Review and Opinion has been prepared for the exclusive use and reliance of the Client. Use or reliance by any other party is prohibited without the written authorization of CREtelligent.

If you have any questions about this review, or if we can be of any further service to you, please do not hesitate to contact us at (866) 901-7201.

Sincerely,

CREtelligent



Tim Smith  
Project Manager



Lucy Mulvey  
Environmental Professional