



Phase I Environmental Site Assessment Report

September 13, 2023



Crosspoint

Verizon Wireless # US-NC-5292
NC Highway 42
Moncure, North Carolina 27559
Trileaf # 732555

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1.0 EXECUTIVE SUMMARY

This report presents the results of a Phase I Environmental Site Assessment (ESA) conducted by Trileaf Corporation (Trileaf) of a portion of the property owned by Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple and proposed to be leased by Vertical Bridge REIT, LLC (Vertical Bridge) at NC Highway 42, Moncure, Chatham County, North Carolina 27559 (Subject Property). Specifically, the ‘*Subject Property*’, hereinafter refers to the area that is proposed to be leased or otherwise disturbed by the proposed Vertical Bridge installation. The Subject Property and immediate surrounding area were evaluated for this report.

This study was initiated by Vertical Bridge, hereinafter referred to as ‘User’, to investigate potential environmental concerns at the Subject Property.

The proposed lease area of the Subject Property is currently grass-covered land, while the proposed access/utility easement is currently grass-covered land and a dirt road. The Subject Property is located within the boundaries of a ‘*parent parcel*,’ which refers to County Assessor’s Parcel Number (APN) 0083021, totaling approximately 37.8 acres. The parent parcel is generally used for the activities of agricultural land. The Subject Property is approximately located in the center of the parent parcel.

The proposed Subject Property development includes the construction of a 195-foot monopole telecommunications tower, (199-foot with appurtenances) 497 square foot equipment area, a backup generator on a concrete pad, an equipment cabinet on a concrete pad, a proposed 30-foot waveguide bridge, and other associated ground-based equipment within a proposed 60-foot by 60-foot fenced compound within a 100-foot by 100-foot lease area. Access and utilities would be granted via a new proposed 30-foot wide easement extending approximately 665-feet north partially through an existing easement extending generally northeast, then diverting northwest terminating at NC Highway 42.

Subject Property details are as follows:

<i>Table 1.0: Subject Property Details</i>	
Parent Parcel Number(s)	0083021
Subject Property/Lease Area Size	10,000 square feet
Existing Compound Size	N/A
Owner	Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple
Tower Type	Raw-Land New Build

TAB 9-Phase 1 Report-Summary Version

Refer to the site sketches in the [Site Plan and Other Maps \(Appendix 13.2\)](#) for the general layout and location of the proposed lease area and utilities. Trileaf has assessed the entire proposed compound area, the proposed Verizon lease area, the proposed site access and utility routes, and the areas immediately surrounding these areas. In the event that the construction and installation plans deviate marginally from the drawings provided in Appendix 13.2, it should not change Trileaf's findings or conclusions regarding the site.

Trileaf has performed a Phase I ESA in conformance with the scope and limitations of ASTM E1527-21 of the Subject Property. Exceptions to, or deletions from, this practice are described in Section 2.4 of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the Subject Property.

In addition, Trileaf reviewed the site for environmental conditions that are beyond the scope of ASTM E1527-21, and has determined the following:

- No wetlands were identified within 300 feet of the Subject Property. However, an unnamed tributary of Buckhorn Creek is located approximately 0.15 miles north of the proposed lease area and approximately 250 feet north of the proposed access/utility easement at its closest point.
- No lead-based paint, lead-containing paint, or asbestos-containing materials are anticipated to be disturbed as part of the proposed installation.
- No wastewater discharges, drains, or wells were identified within 300 feet of the Subject Property. However, a roadside drainage ditch was observed along NC Highway 42 bisecting the terminus of the proposed access/utility easement.

It is the opinion of Trileaf that no further investigation is warranted at this time.

These conclusions are based on the review of available historical information, regulatory records, site reconnaissance and interviews when possible. These conclusions are not subject to environmental concerns or contamination that is hidden, unpublished, or otherwise unknown using standard ASTM E 1527-21 Phase I ESA methodology. .

It should be noted that this section is only a brief summary of the findings and does not represent a detailed summary of the information gathered in the preparation of this report. The report should be reviewed in its entirety to fully understand environmental conditions associated with the Subject Property.

2.0 INTRODUCTION

2.1 Purpose

The purpose of this assessment is to identify RECs, including Controlled RECs (CRECs) associated with the Subject Property, establish bona fide prospective purchaser liability protection and contiguous property owner liability protection in relation to the Subject Property. ASTM E1527-21 defines the term “recognized environmental condition” as:

“...(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...”

ASTM E1527-21 defines the term “controlled recognized environmental condition” as:

“...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).”

In addition, this assessment summarizes Historical RECs (HRECs) associated with the Subject Property. ASTM E1527-21 defines the term “historical recognized environmental condition” as:

“...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).”

ASTM E1527-21 also defines a “*de minimis* condition” as:

“...a condition related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.”

2.2 Detailed Scope-of-Services and ASTM Standard Practice E 1527-21

On August 18, 2023, Vertical Bridge REIT, LLC contracted with Trileaf to conduct a standard Phase I ESA for the Subject Property. Trileaf performed the following services:

- Site reconnaissance

- Records review of federal and state databases
- Review of previous environmental reports (when available)
- Interviews (where possible) and review of government records
- Review of historical topographic maps
- Review of historical aerial photographs
- Review of historical Sanborn fire insurance maps (when available)
- Review of city directories (when available)
- Research additional items not covered by ASTM E1527-21

The most recent U.S. Geological Survey topographic map is included in the [Site Vicinity Map \(Appendix 13.1\)](#). A site plan is also included in the [Site Plan and Other Maps \(Appendix 13.2\)](#).

2.3 Significant Assumptions

It is assumed that the direction of surface water flow in the vicinity of the Subject Property approximates the direction of subsurface shallow groundwater flow in lieu of additional local shallow groundwater information; however, localized geologic characteristics and other subsurface conditions could alter the normally expected shallow groundwater flow direction. In order to more accurately determine the direction of local groundwater flow, subsurface water table measurements would be required.

2.4 Deviations

This Phase I ESA has been subject to the following data gaps, limiting conditions, deviations, deletions and/or exceptions:

- Some historical records reviewed were not readily available in five-year intervals or prior to first use of the Subject Property.

It is Trileaf's opinion that none of the above-mentioned data failures, data gaps, limiting conditions, deviations, deletions and exceptions have significantly affected Trileaf's ability to identify RECs in connection with the Subject Property.

2.5 Limitations and Exceptions

The information presented in this report is compiled from a variety of sources over which Trileaf has neither affiliation nor control. Although these sources are considered reliable, no ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with the Subject Property. Performance of the practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property. This Phase I ESA was done in conformance with ASTM E1527-21.

Based upon this review, Trileaf found no significant data gaps that affected our ability to identify RECs associated with the Subject Property.

2.6 Special Terms and Conditions

This assessment has been conducted in accordance with ASTM E1527-21. There were no special terms or conditions involved with this assessment.

2.7 User Reliance

This report may be relied upon by Vertical Bridge only. Reliance on this document by any other party is forbidden without the express written consent of Trileaf in the form of a signed Reliance Letter and that party’s acceptance of mutually agreeable terms and conditions. Use of this report for purposes beyond those reasonably intended by Vertical Bridge and Trileaf will be at the sole risk of the unintended user.

This report is based on the best current available information and prepared in accordance with generally accepted practices in the field of environmental consulting. Trileaf is not responsible for independent conclusions or recommendations made by others based on the data presented in this report.

3.0 SITE DESCRIPTION

3.1 Subject Property Location and Legal Description

The Subject Property consists of a 10,000-square-foot proposed lease area, as well as an approximately 695-foot long proposed access/utility easement extending generally north from the lease area. The proposed lease area of the Subject Property is located on the central portion of the parent parcel.

The parent parcel is located in Chatham County, North Carolina. The parent parcel is developed with agricultural land.

The following table summarizes the location and legal description of the Subject Property.

<i>Table 3.1: Location and Legal Description</i>	
Parent Parcel Number(s)	0083021
Parent Parcel Acreage	37.8 acres
Subject Property/Lease Area Size	10,000 square feet
Land Use of Parent Parcel	Agricultural land
Address	NC Highway 42
City, State	Moncure, North Carolina

<i>Table 3.1: Location and Legal Description</i>	
County	Chatham
Zip	27559
Site Coordinates of Proposed Lease Area	35.572401° North latitude and 78.993161° West longitude

The Subject Property location is indicated on a Site Vicinity Map included in [Appendix 13.1](#) and a site plan is included in [Appendix 13.2](#). A full legal description of the parent parcel can be found in the Title Report located in [Appendix 13.9](#).

3.2 Site and Vicinity General Characteristics

<i>Table 3.2: Site and Vicinity General Characteristics</i>	
Proposed Lease Area Description	Currently grass-covered land
Subject Property Location Type	Rural
Current Subject Property Use	Grass-covered land
General Surrounding Property Characteristics	Grass-covered land
Elevation	288.46
Shallow Groundwater Flow	Local topography and surface water drainage suggests that the direction of shallow groundwater flow beneath the Subject Property is to the south-southeast. In order to more accurately determine the direction of local shallow groundwater flow, groundwater potentiometric surface measurements would be required.

3.3 Current and Past Uses of the Subject Property

The parent parcel of the Subject Property is currently utilized as agricultural and wooded land. The Subject Property itself currently consists of grass-covered land of the parent parcel.

3.4 Descriptions of Structures, Roads, and Other Improvements on the Subject Property

The following table provides information on improvements present on the Subject Property at the time of the site reconnaissance.

<i>Table 3.4: Summary of Subject Property Improvements</i>		
Item	Observed on the Subject Property	Comments
Structures	No	
Heating/Cooling System	No	
Potable Water Source	No	
Sewage Disposal System	No	
Drainage Control Measures	Yes	A roadside drainage ditch was observed along NC Highway 42 bisecting the terminus of the proposed access/utility easement.
Roads	Yes	An existing dirt road comprises a portion of the proposed access/utility easement.
Other Improvements (specify)	No	

Trileaf did not observe additional potentially adverse environmental conditions associated with the adjoining properties during the site walkover.

3.5 Current and Past Uses of Adjoining/Surrounding Properties

<i>Table 3.5: Summary of Adjoining Property Use</i>		
Direction	Current Use(s)	Past Use(s)
North	NC Highway 42 followed by wooded land (2627 NC Highway 42)	NC Highway 42 followed by wooded land
East	Grass-covered land followed by agricultural land (Parent Parcel)	Wooded land followed by agricultural land; agricultural land

<i>Table 3.5: Summary of Adjoining Property Use</i>		
Direction	Current Use(s)	Past Use(s)
South	Wooded land (Parent Parcel)	Wooded land
West	Grass-covered land followed by church and cemetery (2438 Avent Ferry Road)	Wooded land followed by church and cemetery; Agricultural followed by a church and cemetery

3.6 Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions

The EDR GeoCheck Physical Setting Source (PSS) Addendum, contained within the radius search report, was used as the primary source for the following information. Other maps, including but not limited to regional topographical maps, geological maps, and U.S. Geological Survey well maps, were also reviewed.

<i>Table 3.6: Geologic, Hydrologic, and Topographic Conditions</i>	
Item	Description
Lithology (Soils)	
Source	U.S. Department of Agriculture Soil Conservation Service
Soil Type(s)	Creedmoor sandy loam
Infiltration Rate	Low
Drainage	moderately well
Soil Profile	A typical profile of a Creedmoor sandy loam soil consists of sandy loam from 0 to 8 inches, followed by sandy clay loam from 8 to 19 inches, followed by a layer of clay from 19 to 56 inches, followed by a layer of sandy loam from 56 to 77 inches, followed by a layer of unweathered bedrock from 77 to 81 inches, subsurface.
Geology	
Geologic Sources(s)	Rhodes, Thomas S., and Conrad, Stephen G., 1985, Geologic Map of North Carolina: Department of Natural Resources and Community Development, Division of Land Resources, and the NC Geological Survey, compiled by Brown, Philip M., et al, and Parker, John M. III, and in association with the State Geologic Map Advisory Committee, scale 1:500,000.

<i>Table 3.6: Geologic, Hydrologic, and Topographic Conditions</i>	
Item	Description
Geologic Description	Based on a review of the Geologic Map of North Carolina, dated 1985, the Property is underlain by the Metamorphosed Granitic Rock of the Cambrian/ Late Proterozoic geologic age, consisting of granite.
Hydrology	
Hydrologic Source(s)	EDR’s PSS Addendum map
On-Property Water Bodies	None
Off-Property Water Bodies	<p>An unnamed tributary of Buckhorn Creek is located approximately 0.15 miles north of the proposed lease area and approximately 250 feet north of the proposed access/utility easement at its closest point.</p> <p>A freshwater pond is located approximately 0.14 miles southwest of the proposed lease area and approximately 0.18 miles southwest of the proposed access/utility easement at its closest point.</p> <p>An unnamed tributary of Buckhorn Creek is located approximately 0.27 miles east of the lease area and approximately 0.27 miles east of the proposed access/utility easement at its closest point.</p> <p>Shearon Harris Reservoir is located approximately 0.81 miles east of the proposed lease area and approximately 0.81 miles from the proposed access/utility easement at its closest point.</p>
Presumed Groundwater Flow Direction	Local topography and surface water drainage suggests that the direction of shallow groundwater flow beneath the Subject Property is to the south-southeast. In order to more accurately determine the direction of local shallow groundwater flow, groundwater potentiometric surface measurements would be required.
Groundwater Wells	According to EDR PSS Addendum map, there are water wells located within 0.5 miles of the Subject Property, though none are located on or adjoining the Property. Shallow groundwater depth was not reported in the well identified by EDR.
Topographic Conditions	
Topographic Source(s)	7.5-minute U.S. Geological Survey Topographic Map Cokesbury, North Carolina Quadrangle, dated 2019
Subject Property Elevation	approximately 288.46 feet AMSL
Subject Property Setting	Rural

<i>Table 3.6: Geologic, Hydrologic, and Topographic Conditions</i>	
Item	Description
Topography	Generally flat
Surface Water Runoff	South-southeast

4.0 USER PROVIDED INFORMATION

The following table summarizes whether the User provided pertinent information to Trileaf. In the event the User provided information, it is detailed in the sections following the table.

4.1 User Questionnaire

Trileaf reviewed the All Appropriate Inquiries (AAI) User Questionnaire prepared by Ms. Victoria M. Farmer. Based upon this review, Ms. Victoria M. Farmer had no specialized knowledge of environmental clean-up liens or activity and use limitations. In addition, Ms. Victoria M. Farmer had no knowledge pertaining to the storage of chemicals, spills, environmental clean-ups, or contamination that might have resulted in the degradation of the environmental quality of the Subject Property. A copy of the AAI User Questionnaire is provided in the User Questionnaire ([Appendix 13.7](#)).

4.2 Title Records and Environmental Liens

Trileaf obtained chain-of-title information at the request of the User. Based upon the title chain, the Subject Property is currently owned by Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple. Trileaf also reviewed all previous owners noted in the title chain, and found none that may represent a potential REC.

4.3 Activity and Use Limitations

Trileaf has reviewed the title documents provided by the User, referenced in Section 4.2 above, and has found no evidence of environmental liens or activity and use limitations.

4.4 Specialized Knowledge

The User reported no Specialized Knowledge or experience material to RECs in connection with the Subject Property; actual knowledge of valuation reduction associated with environmental issues for the Subject Property; or commonly known reasonably ascertainable information within the local community about the Subject Property that is material to RECs in connection with the Subject Property. ASTM Standard E 1527-21 defines the term “reasonably ascertainable” as “*information that is: (1) publicly available; (2) obtainable from its source within reasonable time and cost constraints; and (3) practically reviewable.*”

4.5 Owner, Subject Property Manager, and Occupant Information

The Subject Property is currently owned by Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple and is proposed to be leased by Vertical Bridge REIT, LLC. There are no reported occupants or property managers associated with the Subject Property.

4.6 Proposed Site Design Drawings

See [Section 4.7](#) below and [Appendix 13.2](#) for a description and drawings depicting the proposed Vertical Bridge REIT, LLC installation.

4.7 Proposed Structure Information, Including Proposed Height and Foundation Depth

The proposed Subject Property development includes the construction of a 195-foot monopole telecommunications tower, (199-foot with appurtenances) 497 square foot equipment area, a backup generator on a concrete pad, an equipment cabinet on a concrete pad, a proposed 30-foot waveguide bridge, and other associated ground-based equipment within a proposed 60-foot by 60-foot fenced compound within a 100-foot by 100-foot lease area. Access and utilities would be granted via a new proposed 30-foot wide easement extending approximately 665-feet north partially through an existing easement extending generally northeast, then diverting northwest terminating at NC Highway 42. The proposed foundation depth was not reported to Trileaf.

4.8 Other

Trileaf reviewed a Phase I Environmental Site Assessment conducted on NC Highway 42, dated March 1, 2023 prepared by Trileaf on behalf of Verizon Wireless. This report was prepared in accordance with American Society for Testing and Materials (ASTM) Standard E 1527-13, which was the current standard at the time. According to this report, the Subject Property was grass-covered land prior to construction of the existing improvements. The Phase I report did not identify RECs, CRECS, HRECs, or *de minimis* conditions in connection with the Subject Property. A copy of the report is available upon request.

5.0 SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

The site reconnaissance included a walkover and examination of the Subject Property and the adjacent properties. Observations of the Subject Property and the adjoining properties were made from within the Subject Property boundaries, and photographs were taken. Photographic documentation is included in the [Site Photographs \(Appendix 13.3\)](#).

<i>Table 5.1: Methodology and Limiting Conditions</i>	
Date of Site Visit:	September 1, 2023
Personnel:	Mr. William McLean
Escort(s):	N/A
Limiting Conditions:	None

5.2 General Site Setting

A summary of the General Site Setting is provided in the table below.

<i>Table 5.2: General Site Setting</i>	
Subject Property Size	10,000 (square feet)
Feet Above Mean Sea Level	288.46
Area Use	Rural
Site County	Chatham
Site State	North Carolina
Topography	<p>Generally flat</p> <p>The Subject Property is located on relatively flat land with no creeks, or ravines. However, a roadside drainage ditch was observed along NC Highway 42 bisecting the terminus of the proposed access/utility easement.</p> <p>No bedrock outcrops or sinkholes were noted in the area.</p>

<i>Table 5.2.1 Site Reconnaissance Summary</i>			
Feature	Observed on or near Subject Property	Comment(s) in Section	Environmental Concern
Buried Debris, Debris/Soil Piles, Evidence of Dumping, and/or Fill Material	No	-	No

<i>Table 5.2.1 Site Reconnaissance Summary</i>			
Feature	Observed on or near Subject Property	Comment(s) in Section	Environmental Concern
Detention or Retention Basins, Stormwater Drains, or Other Stormwater / Water Features	Yes	5.3	No
Drains (other than municipal sanitary waste drains such as sinks, showers, and toilets)	No	-	No
Drums and Chemical Containers (capacity 5 to 55 gallons)	No	-	No
Generation, Storage, and/or Disposal of Hazardous Waste (including waste oil and batteries)	No	-	No
Heating and Cooling Systems	No	-	No
High-Voltage Electrical Transmission Lines	No	-	No
Interceptors and/or Separators (including OWS)	No	-	No
On-Site Records	No	-	No
Pools, Pits, Cisterns, Sumps, Vaults, or Similar Receptacles Where Liquids Drain, Collect or are Stored, and Pooled Liquids	No	-	No
Septic Systems	No	-	No
Stained Surfaces and/or Stressed Vegetation	No	-	No
Sources of Polychlorinated Biphenyls (PCBs)	No	-	No
Storage Tanks (USTs, ASTs, or totes)	No	-	No
Unidentified Substances	No	-	No
Wastewater (excluding sanitary wastes)	No	-	No
Wells (potable, monitoring, observation, or dry)	No	-	No

<i>Table 5.2.1 Site Reconnaissance Summary</i>			
Feature	Observed on or near Subject Property	Comment(s) in Section	Environmental Concern
Other Improvements, Features, or Environmental Concerns	No	-	No

No obvious signs of environmental concerns (monitoring wells, soil staining, stressed vegetation, odors, pools of liquid, and other signs of potential environmental concerns) were noted on the Subject Property or on the adjoining properties.

5.3 Exterior Observations

The Subject Property consisted of grass covered land associated with agricultural land. Easements extended through grass-covered land terminating at NC Highway 42.

A roadside drainage ditch was observed along NC Highway 42 bisecting the terminus of the proposed access/utility easement. This ditch is not considered an environmental concern to the Subject Property.

5.3.1 Utilities

The Subject Property currently consists of an unutilized portion of the parcel and is therefore served by no utilities.

5.3.2 Waste Generation

The Subject Property is currently vacant and does not produce any debris. No evidence of hazardous waste generation was observed during site reconnaissance.

5.3.3 Storage Tanks and Use

The Subject Property was inspected for visual evidence of both aboveground and underground storage tanks, including vent pipes, fill pipes, and manways.

No evidence of storage tanks was noted during the site inspection.

5.3.4 Chemical Use and Storage

No chemicals were observed on the Subject Property.

5.3.5 Toxic Substances Control Act – Polychlorinated Biphenyls and other Substances

Historically, PCBs, a group of hazardous substances and suspected human carcinogens, were widely used as an additive in cooling oils for electrical components. Typical sources of PCBs can include elevators and hydraulic equipment.

No potential PCB sources (i.e., transformers and hydraulic equipment) were observed on the Subject Property.

5.3.6 Other Concerns / Emerging Contaminants

As defined in 3.2.36 of the ASTM Phase I practice, *hazardous substance* means “those substances defined as a *hazardous substance* pursuant to CERCLA 42 U.S.C. § 9601(14), as interpreted by EPA regulations and the courts.” There are some substances that non-*environmental professionals* and others may assume to be *hazardous substances* that are not defined (or not yet defined) as *hazardous substances* under CERCLA through interpretation by EPA regulations and the courts. These substances may include: (1) some substances that occur naturally or through biological digestion (for example, methane), and (2) substances about which human understanding is evolving (for example, per- and polyfluoroalkyl substances, also known as “PFAS”). These and any other “emerging contaminants,” where they are not identified as a *hazardous substance* by CERCLA, as interpreted by EPA regulations and the courts, are not included in the scope of this practice. Some of these substances may be considered a “*hazardous substance*” (or equivalent) under applicable state laws. In those instances, where a *Phase I Environmental Site Assessment* is performed to satisfy both federal and state requirements, or as directed by the *user* of the *report*, it is permissible to include analysis and/or discussion of these substances in the same manner as any other Non-Scope Consideration. If and when such emerging contaminants are defined to be a *hazardous substance* under CERCLA, as interpreted by EPA regulations and the courts, such substances shall be evaluated within the scope of this practice.

Trileaf did not identify any emerging contaminants as potential concerns during the course of this assessment.

No other concerns were noted during the site inspection.

5.4 Interior Observations

There were no buildings on the Subject Property, therefore no interior observations were required.

5.5 Asbestos

The use of Asbestos Containing Material (ACM) was curtailed after the United States Environmental Protection Agency (EPA) began to consider regulating the commercial uses of asbestos in 1979. ACM was officially banned in 1989; however, in 1991, the courts overturned the majority of the ban. Therefore, ACM is still legal and utilized in many applications. Building materials that are Suspect Asbestos-Containing

Materials (Suspect ACM) are divided into three categories: surfacing materials that are sprayed or troweled on for acoustical, decorative, or fireproofing purposes (examples include textured ceilings or drywall, exterior stucco and structural steel fireproofing); Thermal System Insulation (TSI) used to inhibit heat transfer from pipes, boilers, tanks, ducts, and various other components of hot and cold water systems and HVAC systems (examples include hard cementitious “mud” type insulation on pipes, boilers and flues); and miscellaneous materials consisting mostly of non-friable products and materials such as floor tile, drywall, ceiling tile and roofing felt.

As there are no structures on the Subject Property, no Suspect ACM is anticipated to be disturbed as part of the proposed wireless installation.

5.6 Lead-Based Paint

The EPA defines “lead-based paint” (LBP) as paint containing equal-to or greater-than one milligram per square centimeter or 0.5% by weight of lead (5,000 parts-per-million). The EPA banned the use of LBP in target housing and child-occupied facilities in 1978; however, LBP is still utilized in other applications. According to 41 CFR 101-42.001, Lead-Containing Paint (LCP) is defined as paint or other similar surface coating material that contains lead or lead compounds in excess of 0.06 percent of the weight of the total nonvolatile content of the paint or the weight of the dried paint film. However, it should be noted that for all tasks governed by OSHA’s Lead in Construction Standard (29 CFR 1926.62), if a paint contains any level of lead, employers must comply with the assessment measures and any applicable protections of that standard.

As there are no painted structures on the Property, no LBP or LCP is anticipated to be disturbed as part of the proposed installation.

5.7 Mold

As there are no structures on the Subject Property, any mold on the Subject Property is the result of natural, ambient levels.

6.0 INTERVIEWS

Trileaf conducted and/or attempted to conduct the following interviews in relation to the Subject Property.

<i>Table 6.0: Summary of Interviews</i>				
Title	Contact	Contact Information	Date(s) Contacted	Response Received?
Owner(s)	Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple Subject Property Owner representative: Ms. Kimberly Cotten-West	919-971-5828	September 9, 2023	Yes
Neighbors	N/A	N/A	N/A	No
Site Manager	N/A	N/A	N/A	No
Site Occupants	N/A	N/A	N/A	No
Local Government Officials	North Carolina Department of Environmental Quality (NCDEQ)	https://www.deq.nc.gov/ news/ requesting-public-records	August 21, 2023	Yes
	Chatham County Emergency Management (CEM)	steve.newton@chathamcountync.gov	August 21, 2023	Yes
Other	N/A	N/A	N/A	No

6.1 Interview with Owner(s)

According to the Chatham County Assessor, the Subject Property is owned by Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple and Ms. West identified herself as the current owner representative. The parent parcel is primarily used as agricultural land.

Ms. Cotton-West was forthcoming with information and stated that she had owned the land since approximately September of 2016. Ms. Cotton-West was unaware of any environmental concerns associated with the Subject Property and/or parent parcel.

Ms. Cotton-West was unaware of previous environmental site assessment reports, USTs or ASTs, chemical storage, fill material, notices or other correspondence from government agencies relating to past or current violations of environmental laws, hazardous waste generator notices or reports associated with the Subject Property.

Ms. Cotton-West had no knowledge of pending, threatened, or past litigation or administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Subject Property, or notices from any governmental entity regarding possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products.

The contact information for Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple is included in the [Interviews and Records Requests \(Appendix 13.6\)](#).

6.2 Interview with Neighbors

No neighbors were interviewed for the purpose of this report.

6.3 Interview with Site Manager

No site managers were reported to Trileaf, with the exception of the representative of Harvey L. West, Jr. and Kimberly Anne Cotten-West, A Married Couple described in Section 6.1.

6.4 Interviews With Local Government Officials and Records Requests

On August 21, 2023, Trileaf submitted a Public Records Request (PRR) via email to the North Carolina Department of Environmental Quality (NCDEQ). Trileaf requested information pertaining to potential environmental concerns associated with the Subject Property. On August 21, 2023, NCDEQ replied via email that they had no records related to the request.

On August 21, 2023, Trileaf submitted a Freedom of Information Act (FOIA) request via email to the Chatham County Emergency Management (CCEM). Trileaf requested information pertaining to potential environmental concerns associated with the Subject Property. On August 21, 2023, CCEM replied via email that they had no records related to the request.

6.5 Interviews with Others

Trileaf conducted no other interviews for the purpose of this report.

7.0 RECORDS REVIEW

7.1 Environmental Records Sources per Scope of Work

Trileaf reviewed an environmental database search dated August 21, 2023. The environmental database search meets the government records search requirements of ASTM E1527-21 for Environmental Site Assessments. The relevant portions of the search will be summarized in this section. A table of the total number of sites in each respective category can be found in the report in the [Regulatory Records Documentation \(Appendix 13.5\)](#).

TAB 9-Phase 1 Report-Summary Version

Regulatory Report Summary

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
NPL	1.000	0	0	0	0	0	0
Proposed NPL	1.000	0	0	0	0	0	0
NPL LIENS	0	NR	NR	NR	NR	NR	0
Delisted NPL	1.000	0	0	0	0	0	0
FEDERAL FACILITY	0.500	0	0	0	0	NR	0
SEMS	0.500	0	0	0	0	NR	0
SEMS-ARCHIVE	0.500	0	0	0	0	NR	0
CORRACTS	1.000	0	0	0	0	0	0
RCRA-TSDF	0.500	0	0	0	0	NR	0
RCRA-LQG	0.250	0	0	0	NR	NR	0
RCRA-SQG	0.250	0	0	0	NR	NR	0
RCRA-VSQG	0.250	0	0	0	NR	NR	0
LUCIS	0.500	0	0	0	0	NR	0
US ENG CONTROLS	0.500	0	0	0	0	NR	0

TAB 9-Phase 1 Report-Summary Version

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
US INST CONTROL	0.500	0	0	0	0	NR	0
ERNS	0.250	0	0	0	NR	NR	0
NC HSDS	1.000	0	0	0	0	0	0
SHWS	1.000	0	0	0	0	0	0
SWF/LF	0.500	0	0	0	0	NR	0
DEBRIS	0.500	0	0	0	0	NR	0
OLI	0.500	0	0	0	0	NR	0
LCID	0.500	0	0	0	0	NR	0
LUST	0.500	0	0	0	0	NR	0
LAST	0.500	0	0	0	0	NR	0
INDIAN LUST	0.500	0	0	0	0	NR	0
LUST TRUST	0.500	0	0	0	0	NR	0
FEMA UST	0.250	0	0	0	NR	NR	0
UST	0.250	0	0	0	NR	NR	0
AST	0.250	0	0	0	NR	NR	0
INDIAN UST	0.250	0	0	0	NR	NR	0
INST CONTROL	0.500	0	0	0	0	NR	0
VCP	0.500	0	0	0	0	NR	0

TAB 9-Phase 1 Report-Summary Version

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
INDIAN VCP	0.500	0	0	0	0	NR	0
BROWNFIELDS	0.500	0	0	0	0	NR	0
US BROWNFIELDS	0.500	0	0	0	0	NR	0
HIST LF	0.500	0	0	0	0	NR	0
SWRCY	0.500	0	0	0	0	NR	0
INDIAN ODI	0.500	0	0	0	0	NR	0
DEBRIS REGION 9	0.500	0	0	0	0	NR	0
ODI	0.500	0	0	0	0	NR	0
IHS OPEN DUMPS	0.500	0	0	0	0	NR	0
US HIST CDL	0	NR	NR	NR	NR	NR	0
US CDL	0	NR	NR	NR	NR	NR	0
LIENS 2	0	NR	NR	NR	NR	NR	0
HMIRS	0	NR	NR	NR	NR	NR	0
SPILLS	0.500	0	0	0	0	NR	0
IMD	0.500	0	0	0	0	NR	0
SPILLS 90	0.500	0	0	0	0	NR	0
SPILLS 80	0.500	0	0	0	0	NR	0

TAB 9-Phase 1 Report-Summary Version

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
RCRA NonGen / NLR	0	NR	NR	NR	NR	NR	0
FUDS	1.000	0	0	0	0	0	0
DOD	1.000	0	0	0	0	0	0
SCRD DRYCLE ANERS	0.500	0	0	0	0	NR	0
US FIN ASSUR	0	NR	NR	NR	NR	NR	0
EPA WATCH LIST	0	NR	NR	NR	NR	NR	0
2020 COR ACTION	0.250	0	0	0	NR	NR	0
TSCA	0.250	0	0	0	NR	NR	0
TRIS	0.250	0	0	0	NR	NR	0
SSTS	0	NR	NR	NR	NR	NR	0
ROD	1.000	0	0	0	0	0	0
RMP	0	NR	NR	NR	NR	NR	0
RAATS	0	NR	NR	NR	NR	NR	0
PRP	0	NR	NR	NR	NR	NR	0
PADS	0	NR	NR	NR	NR	NR	0
ICIS	0	NR	NR	NR	NR	NR	0
FTTS	0.250	0	0	0	NR	NR	0
MLTS	0.250	0	0	0	NR	NR	0

TAB 9-Phase 1 Report-Summary Version

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
COAL ASH DOE	0	NR	NR	NR	NR	NR	0
COAL ASH EPA	0.500	0	0	0	0	NR	0
PCB TRANSFORMER	0	NR	NR	NR	NR	NR	0
RADINFO	0	NR	NR	NR	NR	NR	0
HIST FTTS	0	NR	NR	NR	NR	NR	0
DOT OPS	0	NR	NR	NR	NR	NR	0
CONSENT	1.000	0	0	0	0	0	0
INDIAN RESERV	1.000	0	0	0	0	0	0
FUSRAP	1.000	0	0	0	0	0	0
UMTRA	0.500	0	0	0	0	NR	0
LEAD SMELTERS	0	NR	NR	NR	NR	NR	0
US AIRS	0	NR	NR	NR	NR	NR	0
US MINES	0.250	0	0	0	NR	NR	0
ABANDONED MINES	0.500	0	0	0	0	NR	0
FINDS	0.250	0	0	0	NR	NR	0
UXO	1.000	0	0	0	0	0	0

TAB 9-Phase 1 Report-Summary Version

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
DOCKET HWC	0	NR	NR	NR	NR	NR	0
ECHO	0	NR	NR	NR	NR	NR	0
FUELS PROGRAM	0.250	0	0	0	NR	NR	0
PFAS NPL	0.250	0	0	0	NR	NR	0
PFAS FEDERAL SITES	0.250	0	0	0	NR	NR	0
PFAS TSCA	0.250	0	0	0	NR	NR	0
PFAS RCRA MANIFEST	0.250	0	0	0	NR	NR	0
PFAS ATSDR	0.250	0	0	0	NR	NR	0
PFAS WQP	0.250	0	0	0	NR	NR	0
PFAS NPDES	0.250	0	0	0	NR	NR	0
PFAS ECHO	0.250	0	0	0	NR	NR	0
PFAS ECHO FIRE TRAINING	0.250	0	0	0	NR	NR	0

TAB 9-Phase 1 Report-Summary Version

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
PFAS PART 139 AIRPORT	0.250	0	0	0	NR	NR	0
AQUEOUS FOAM NRC	0.250	0	0	0	NR	NR	0
PFAS	0	NR	NR	NR	NR	NR	0
AIRS	0	NR	NR	NR	NR	NR	0
ASBESTOS	0	NR	NR	NR	NR	NR	0
COAL ASH	0.500	0	0	0	0	NR	0
DRYCLEANERS	0.250	0	0	0	NR	NR	0
Financial Assurance	0	NR	NR	NR	NR	NR	0
NPDES	0	NR	NR	NR	NR	NR	0
UIC	0	NR	NR	NR	NR	NR	0
AOP	0	NR	NR	NR	NR	NR	0
PCSRP	0.500	0	0	0	0	NR	0
SEPT HAULERS	0	NR	NR	NR	NR	NR	0
MINES MRDS	0	NR	NR	NR	NR	NR	0
PFAS TRIS	0.250	0	0	0	NR	NR	0
CCB	0.500	0	0	0	0	NR	0

Database	Search Radius	Target Property	Within 0.12mi	0.12mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
EDR MGP	1.000	0	0	0	0	0	0
EDR Hist Auto	0.125	0	0	NR	NR	NR	0
EDR Hist Cleaner	0.125	0	0	NR	NR	NR	0
RGA HWS	0	NR	NR	NR	NR	NR	0
RGA LF	0	NR	NR	NR	NR	NR	0
RGA LUST	0	NR	NR	NR	NR	NR	0

No sites were mapped within the respective search radii.

For detailed descriptions of the databases referenced below, please refer to the database descriptions in the environmental database search report included in [Regulatory Records Documentation](#) Appendix 13.5.

It should be noted that additional listings may appear in the table below if they are affiliated with another listing with a larger search radius and includes the categories and search radii required by Verizon Wireless SOW.

7.1.1 Orphan Sites

In addition, Trileaf reviewed the list of “orphan” sites – sites that were unable to be mapped – and found that a total of one (1) orphan site was identified in the regulatory records. Trileaf reviewed site information and found that the orphan site does not pose an environmental concern to the Subject Property based on it's location and/or regulatory status.

A listing of the orphan sites is included in the [Regulatory Records Documentation](#) ([Appendix 13.5](#)).

7.2 Deviations

Trileaf has encountered no deviations from ASTM E1527-21 with regard to environmental records or environmental records sources.

7.3 Additional Environmental Record Sources

Neither the Subject Property nor adjacent parcels were listed in the regulatory records; therefore, it is the opinion of Trileaf that an in-person regulatory file review is unnecessary for the purpose of this assessment.

7.4 Radon

Radon is an odorless, colorless, radioactive gas that occurs naturally in soil, rock and building materials. It results from the natural radioactive decay of radium. In outdoor air, radon is generally diluted to such low concentrations that it is not of concern. In enclosed spaces such as homes or offices, radon can accumulate and pose an environmental concern. Indoor levels of radon depend on a building's construction and the concentration of radon in underlying soil and rock. The EPA recommended action level for radon is 4 picocuries per liter (pCi/L). According to the EPA, Chatham County, North Carolina is located in Zone 3, which has a predicted average indoor radon screening of less than 2.0 pCi/L. There is a low potential that elevated indoor radon concentrations will be encountered if any enclosed spaces are constructed below grade surface; however, since there will be no occupants associated with the structures constructed for the proposed scope of work for this project, radon levels should pose no environmental concern to the Subject Property.

7.5 Wetlands and State Open Waters

According to a desktop review of the US Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) map, in addition to a USGS topographic map, the Subject Property is not mapped within or within 300 feet of a wetland, and the topography does not imply hydrologic activity. In addition, during Trileaf's site reconnaissance, no obligate hydrophytic vegetation was observed within the Subject Property boundaries itself. Finally, according to the Soil Survey provided in the PSSA and sourced from the U.S. Soil Conservation Service Soil Survey (see Section 3.6.2 above), the soil beneath the Subject Property does not meet hydric criteria. Therefore, Trileaf has determined that the Subject Property (including both lease area and easements) is not located within or within 300 feet of a wetland. The Site Vicinity Map is located in Appendix 13.1, and NWI map is included in Appendix 13.2.

In addition, Trileaf reviewed the USGS topographic map and aerial photographs in combination with site reconnaissance and determined that an unnamed tributary of Buckhorn Creek is located approximately 0.15 miles north of the proposed lease area and approximately 250 feet north of the easement terminus with NC HWY 42. The Site Vicinity Map is located in Appendix 13.1, and the NWI map is included in Appendix 13.2.

7.6 Physical Settings Sources

Physical Settings Sources are discussed in [Section 3.6](#).

7.7 Historical Use Information on the Subject Property

Review of the historical information did not identify adverse environmental conditions associated with the Subject Property or adjoining properties. Note that these statements are made from the best information available. Trileaf has found no reason to believe that the use of the Subject Property has been altered between available information sources. Based upon this historical review, Trileaf found no data gaps that significantly affected Trileaf’s ability to identify RECs associated with the Subject Property.

The past use of the Subject Property is summarized in the following table.

<i>Table 7.7: Historical Subject Property Use Summary</i>		
Date(s)	Source(s)	Subject Property Use(s)
1938 - 1993	Historic aerial photographs, historic topographic maps	Wooded and agricultural land; dirt road along northern portion of easement
1998 - 2016	Historic aerial photographs, historic topographic maps	Wooded land; dirt road along northern portion of the easement
2020 - Present	Historic aerial photographs, site reconnaissance, owner interview	Grass-covered land and existing dirt road in the northern portion of the easement

The Subject Property was developed as wooded and agricultural land as early as the 1930s. The northern portion of the easement was used as a dirt road as early as the 1930s. The land regressed into wooded land by the late 1990s and was later cleared to its current state by 2020. See also the [Historical Research Documentation](#) Appendix.

Review of the historical information did not identify adverse environmental conditions associated with the Subject Property.

7.8 Historical Use Information on Adjoining Properties

The past use of the adjoining properties is summarized in the following table.

<i>Table 7.8: Historical Adjoining Property Use Summary</i>		
Date(s)	Source(s)	Property Use(s)
North		

<i>Table 7.8: Historical Adjoining Property Use Summary</i>		
Date(s)	Source(s)	Property Use(s)
1938 - Present	Historic aerial photographs, historic topographic maps, site reconnaissance, owner interview	NC Highway 42 followed by wooded land (2627 NC Highway 42)
East		
1938 - 1993	Historic aerial photographs, historic topographic maps	Agricultural land
1998 - 2016	Historic aerial photographs, historic topographic maps	Wooded land followed by agricultural land
2020 - Present	Historic aerial photographs, site reconnaissance, owner interview	Grass-covered land followed by agricultural land (Parent Parcel)
South		
1938 - Present	Historic aerial photographs, historic topographic maps, site reconnaissance, owner interview	Wooded land (Parent Parcel)
West		
1938 - 1993	Historic aerial photographs, historic topographic maps	Agricultural followed by a church and cemetery
1998 - 2016	Historic aerial photographs, historic topographic maps	Wooded land followed by church and cemetery
2020 - Present	Historic aerial photographs, site reconnaissance, owner interview	Grass-covered land followed by church and cemetery (2438 Avent Ferry Road)

The surrounding area was originally used as agricultural and wooded land as early as the 1930s. A nearby church was also developed to the west by the 1930s and remains to present day. Land surrounding the Subject Property consists of wooded and agricultural land. See also the Historical Research Documentation Appendix.

Trileaf did not observe additional potentially adverse environmental conditions associated with the adjoining properties during the site walkover.

8.0 FINDINGS

The Subject Property consists of an approximately 10,000-square-foot lease area and approximately 695-foot long easement, and is located at NC Highway 42, Moncure, Chatham, North Carolina 27559. The proposed lease area of the Property is currently grass-covered land, while the proposed easement is currently an existing dirt-covered road and grass-covered land. The past use of the Property consisted of wooded and agricultural land. Land surrounding the Property consists of wooded and agricultural land.

A roadside drainage ditch was observed along NC Highway 42 bisecting the terminus of the proposed access/utility easement.

Neither the parent parcel nor the Subject Property were listed in the regulatory records.

8.1 Vapor Encroachment

Trileaf has conducted a Vapor Encroachment Screen (VES) by evaluating historic and regulatory record sources along with soil, topographic, and groundwater data in the vicinity of the Subject Property. The purpose of the VES is to determine the likelihood that Vapor Encroachment Conditions (VECs) exist at the Subject Property. It should be noted that this VES was not conducted in full compliance with ASTM E2600-15; rather, this VES is the equivalent of a Tier 1 screening. Consideration of vapor encroachment consists of reviewing available information and use of professional judgment in determining 1) whether contamination is suspected in the soil and/or groundwater at, or near, the Subject Property, and 2) whether identified contamination is suspected to exist within a 'Critical Distance' from the Subject Property.

“Critical Distances”, as defined in *ASTM E2600-15 Standard Guide for Vapor Encroachment Screening on Subject Property Involved in Real Estate Transactions*, refer to the maximum distances at which vapor encroachment may occur. These distances vary depending on topographic and hydrologic gradient, width of the contaminant plume, and type of contaminant known, or suspected, to exist. Generally, Critical Distances are 100 feet for non-petroleum contaminants of concern (COCs) and 30 feet for dissolved petroleum COCs. If a facility is beyond the critical distance, it is highly unlikely that a VEC exists. Consideration of topographic gradient is key to defining the Areas of Concern (AOCs) within which Critical Distances are applied. When plume data is not available, AOCs are used in lieu of Critical Distance to determine whether a VEC exists or not. According to ASTM E2600, the AOCs for these critical distances are as follows:

- 1,760 feet (1/3 mile) for contamination located up-gradient of the Subject Property, except for dissolved petroleum hydrocarbons, which have a distance of 528 feet (1/10 mile),
- 365 feet for contamination located cross-gradient of the Subject Property,
- 100 feet for contamination located down-gradient of the Subject Property, with the exception of dissolved petroleum hydrocarbons, which have a distance of 30 feet. If non-aqueous phase petroleum hydrocarbons (LNAPL) are present, the 100-foot distance is utilized.

Based on Trileaf's VES, this investigation has identified no potential VECs in connection with the Subject Property.

9.0 CONCLUSIONS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-21 of NC Highway 42, Moncure, Chatham County, North Carolina 27559, the *Subject Property*. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report.

This assessment has revealed no evidence of recognized environmental conditions in connection with the Subject Property.

In addition, Trileaf reviewed the site for environmental conditions that are beyond the scope of ASTM E1527-21, and has determined the following:

- No wetlands were identified within 300 feet of the Subject Property. However, an unnamed tributary of Buckhorn Creek is located approximately 0.15 miles north of the proposed lease area and approximately 250 feet north of the proposed access/utility easement at its closest point.
- No lead-based paint, lead-containing paint, or asbestos-containing materials are anticipated to be disturbed as part of the proposed installation.
- No wastewater discharges, drains, or wells were identified within 300 feet of the Subject Property. However, a roadside drainage ditch was observed along NC Highway 42 bisecting the terminus of the proposed access/utility easement.

It is the opinion of Trileaf that no additional investigation is warranted at this time. These conclusions are based on the review of available historical information, regulatory records, site reconnaissance, and interviews.

10.0 OPINIONS AND RECOMMENDATIONS

This assessment has revealed no evidence of recognized environmental conditions in connection with the Subject Property.

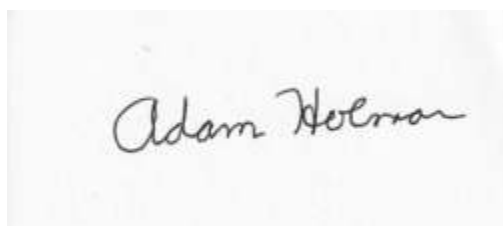
It is the opinion of Trileaf that no additional investigation is warranted at this time. These conclusions are based on the review of available historical information, regulatory records, site reconnaissance, and interviews.

Significant Data Gaps include the following:

11.0 CERTIFICATION STATEMENT. SIGNATURES OF ENVIRONMENTAL PROFESSIONAL

The following environmental professionals and others of Trileaf participated in the writing of this report. This Phase I ESA was performed in accordance with the generally accepted practices in the field of environmental consulting. The analysis and recommendations indicated in this report are based upon the best current available information that could be obtained in the specified time frame. Trileaf assumes no liability for independent conclusions or recommendations made by others in conjunction with the data presented in this report.

We declare that, to the best of our professional knowledge and belief, we meet the definition of *Environmental professional* as defined in § 312.10 of 40 C.F.R. § 312, and We have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of the *subject property*. We have developed and performed the *all appropriate inquiries* in conformance with the standards and practices set forth in 40 C.F.R. Part 312.



Adam Holman
Senior Project Scientist



Gabe Steil
Project Manager II
Environmental Professional

This declaration is dated September 13, 2023.

Resumes of the environmental professionals and others who participated in the preparation of this ESA are included in [Qualifications of Environmental Professionals and Others \(Appendix 13.10\)](#).

12.0 REFERENCES

ASTM E1527-21

Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process

Designation: E1527-21

ASTM International

100 Barr Harbor Drive

West Conshohocken, PA 19428-2959

U.S. Geological Survey

Cokesbury Quadrangle, Subject Property State – 7.5-Minute Series (2019)

[https://viewer.nationalmap.gov/](https://viewer.nationalmap.gov/basic/?basemap=b1&category=ustopo&title=US%20Topo%20Download#startUp)

[basic/?basemap=b1&category=ustopo&title=US%20Topo%20Download#startUp](https://viewer.nationalmap.gov/basic/?basemap=b1&category=ustopo&title=US%20Topo%20Download#startUp)

Environmental Database Resources

6 Armstrong Road, 4th Floor

Shelton, CT 06484

<http://edrnet.com>

Google Inc. (2023)

Google Earth Pro (Version 7.3.1.4507) [Software]. Available from: <http://www.google.com/earth/>

Wetlands Map - US Fish and Wildlife Service

National Wetland Inventory (NWI)

<https://www.fws.gov/wetlands/Data/Mapper.html>