GEOTECHNICAL & GEOLOGY BRANCH 180 5th Street East St. Paul, MN 55101

PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT – Upper Saint Anthony Falls

Disposition Study Minneapolis, Hennepin County, Minnesota

11 March 2020

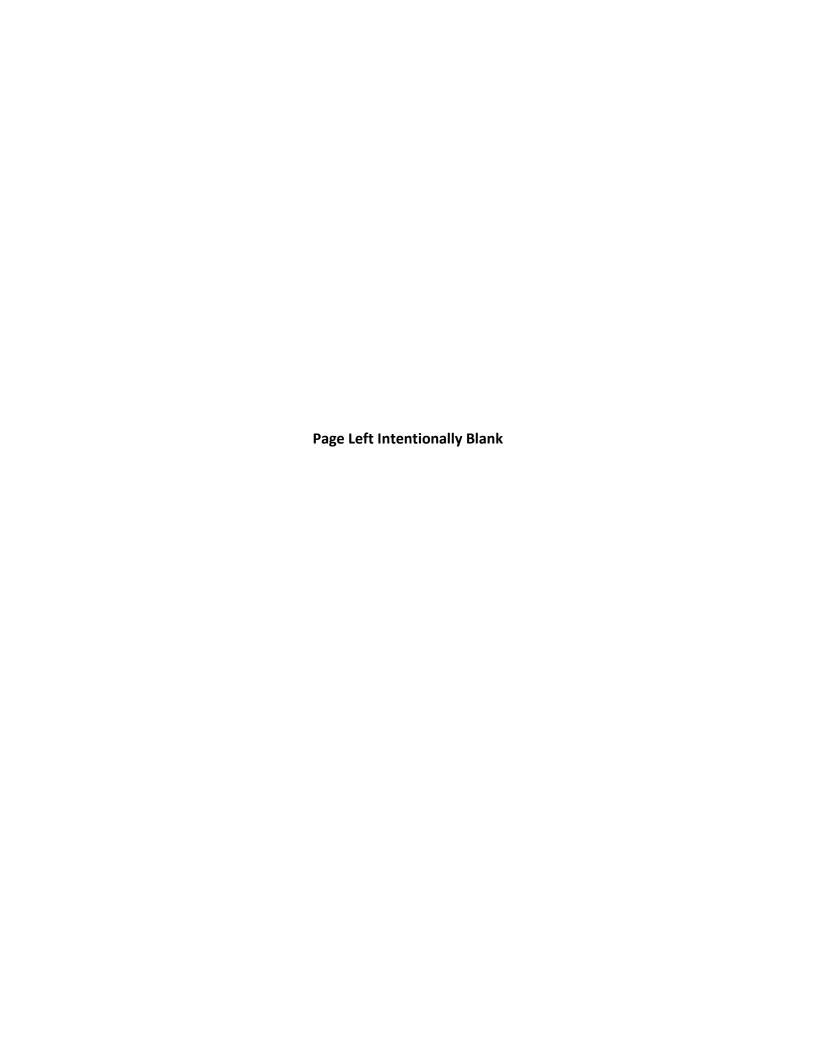


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1.0 Abbreviations

ACM Asbestos Containing Material

AIRS Aerometric Information Retrieval System

AST Aboveground Storage Tank
AUL Activity and Use Limitation

ASTM American Society for Testing Materials

CDL Clandestine Drug Labs

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act of

1980

CERCLIS Comprehensive Environmental Response, Compensation, and Liability

Information System

CESQG Conditionally-Exempt Small Quantity Generators

CFR Code of Federal Regulations
CONSENT Superfund Consent Decrees
CORRACTS Corrective Action Report
DOD Department of Defense Sites
EDR Environmental Data Resources

EPA United States Environmental Protection Agency

ERNS Emergency Response Notification System

ESA Environmental Site Assessment

FIFRA Federal Insecticide, Fungicide, & Rodenticide Act

FINDS Facility Index System

FOIA Freedom of Information Act
FTTS FIFRA/TSCA Tracking System
FUDS Formerly Used Defense Sites

FR Federal Register

HMIRS Hazardous Materials Information Reporting System

LQG Large Quantity Generators

LAST Leaking Aboveground Storage Tank
LUCIS Land Use Control Information System
LUST Leaking Underground Storage Tank

MGS Minnesota Geological Survey

MLTS Material Licensing Tracking System
MPCA Minnesota Pollution Control Agency

NFRAP Former CERCLIS Sites

NPDES National Pollutant Discharge Elimination

NPL National Priorities List
NPL LIENS Federal Superfund Liens
NWI National Wetlands Inventory

ODI Open Dump Inventory

PADS PCB Activity Database System
PCBs Polychlorinated Biphenyls
PDF Portable Digital Format

Phase I Environmental Site Assessment Report – USAF Disposition

PLP Permanent List of Priorities

RAATS RCRA Administrative Action Tracking System RCRA Resource Conservation and Recovery Act

RCRIS Resource Conservation and Recovery Information System

REC Recognized Environmental Condition

ROD Records of Decision

SEMS Superfund Enterprise Management System Archive

SHWS State Hazardous Waste Sites

SPILLS Spills Database

SQG Small Quantity Generators SSTS Section 7 Tracking Systems

SWF Solid Waste Facility
SWRCY Solid Waste Recycling

TRIS Toxic Chemical Release Inventory System

TSCA Toxic Substances Control Act

TSDF Treatment, Storage, and Disposal Facilities

UMTRA Uranium Mill Tailings Sites

USACE United States Army Corps of Engineers

USC United States Code

USGS United States Geological Survey
UST Underground Storage Tank
VCP Voluntary Cleanup Program

2.0 Liability Statement

The following excerpts, unless otherwise noted, are from ASTM E 1527-13; Appendix X1.1.5.2; CERCLA Operator Liability:

'A person may be liable as a CERCLA operator when they exercise control over a facility.'

As defined in 42 U.S.C. 9601 (20) (A) The term "owner or operator" means (ii) in the case of an onshore facility or an offshore facility, any person owning or operating such facility.

As defined in 42 U.S.C. 9601 (9) (A) The term "facility" means any building, structure, installation, equipment, pipe or pipeline, well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located.

'Some courts have held that a person may be liable as a current CERCLA operator where the person did not exercise control over historic operations that caused the contamination but dispersed or moved around contaminated soil...'

'Like a past CERCLA owner, a past operator must have exercised control over the site "at the time of disposal" to be liable as a CERCLA operator. Many courts have held that disposal is not limited to the original release but can encompass subsequent dispersal or movement of hazardous substances.'

Project Information: Upper Saint Anthony Falls Disposition Study

3.0 General Information

Site Information:	U.S. Army Corps of Engineers St. Paul District Upper St. Anthony Falls Lock and Dam 1 Portland Avenue Minneapolis, MN 55401
County: Latitude, Longitude:	Hennepin 44.914849, -93.202606
Site Assessor:	Ashley M. Woods Geologist
Senior Reviewer:	Grant A. Riddick, P.G. Geologist
Environmental Profession	nal Qualification:
	of my professional knowledge and belief, I meet the definition of hal as defined in § 312.10 of 40 CFR 312.
property of the nature, hi	cations based on education, training, and experience to assess a istory, and setting of the subject property. I have developed and riate inquiries in conformance with the standards and practices set
Grant A. Riddick, P.G.	

4.0 Executive Summary

4.1 Subject Property Description

Upper St. Anthony Falls (USAF) Lock and Dam is located at #1 Portland Avenue in downtown Minneapolis Minnesota on the west bank of Mississippi River, between the Third Avenue Bridge and the Stone Arch Bridge. As originally authorized the purpose of the subject property was for navigation (Rivers and Harbors Act 1937). A second authorization (Flood Control Act of 1944) was for the purposes of recreation. During periods of high river stages the dam is operated so that river flows can pass downstream. The dam also serves to help maintain a minimum pool for the City of Minneapolis drinking water supply. As directed by the Water Resources Reform and Development Act of 2014, the lock at USAF was closed to navigation on June 9th, 2015.

The entire property including guide-walls, but exclusive of the river channel proper, is approximately 2,300 feet long. The main working area, which includes the existing structures, is roughly 300 feet by 850 feet and encompass an estimated 3.2 acres. This area contains one lock and dam office building with visitor center, two control buildings, one storage garage, one public use restroom facility, an access road, and public use parking lot. The surrounding area is heavily developed giving rise to a varied land use including recreational, residential, and commercial properties. (NOTE: the river channel itself is not included as a part of this proposed action).

4.2 Environmental Report Summary

The subject property is operated by the U.S. Army Corps of Engineers Saint Paul District. The property is a Hazardous Waste Minimal Quantity Generator for used oil, is a former petroleum leak site, and has one active 500 gallon diesel fuel AST. A series of Brownfield and Petroleum Brownfield remediation sites are near subject property. These sites originated as historic buildings related to the milling industry, and have since been remodeled, demolished or repurposed. It is not anticipated these sites have impacted the subject property.

Upon document review, USAF has *de minimis* conditions for cinders. The USAF western locks were excavated and constructed where Upton Island once stood. The northern extent of this island was once a fill foundation for milling platforms. In this area of the subject property, historic boring logs described cinders and ash above the Platteville Limestone. 2012 and 2015 soil boring logs from the subject property parking lot and unnamed road identify a 7 to 10 foot thick layer of fill above bedrock. The bottom portion of this fill layer is described containing cinders and ash. The EPA does not regulate cinders as a hazardous material, and is not a recognized environmental concern at the subject property.

4.3 Recommendations

Based on the information obtained during the site reconnaissance and document review, *a Phase II ESA is not recommended* for the subject property. It should be noted that the complete report must be read in order to fully understand the findings associated with the subject property.

5.0 Introduction

5.1 Purpose

The purpose of the Phase I ESA was to evaluate the current and historic conditions of the subject property in an effort to identify recognized environmental conditions (REC) in connection with the subject property and surrounding operations.

A Recognized Environmental Condition (REC) is defined by ASTM E 1527-13 as:

The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. *De minimis* conditions are not recognized environmental conditions.

5.2 Scope of Work

The Phase I ESA conducted at the subject property was in accordance with ASTM Standard Practice E 1527-13 and further defined below:

- USACE has gathered and reviewed available historic data, including fire
 insurance maps, survey plat maps, aerial photography, and topographic maps
 from the United States Geological Survey (USGS), hydrogeology and geologic
 maps from the Minnesota Geologic Survey (MNGS), USACE construction
 documents, and interviews with knowledgeable persons.
- USACE has reviewed state and federal environmental databases including NPL, CERCLIS, CORRACTS, RCRA, ERNS, SHWS, SWF, LUST, LAST, UST, AST, CDL, HMIRS, PADS, and SPILLS.
- USACE has physically inspected the subject property via walking survey, looking for signs of recognized environmental conditions such as stressed vegetation, soil staining, dumping, and evidence of aboveground and underground storage tanks.

 USACE has physically observed adjoining properties, paying particular attention to evidence of underground storage tanks, questionable housekeeping practices, or unusual business practices.

5.3 Limitations and Exceptions

The information, conclusions, and recommendations stated in the report are based upon work undertaken by trained professional and technical staff working for the U.S. Army Corps of Engineers, and also upon information provided by others. We have accepted as true and accurate the information provided by other sources, we cannot be held responsible for the accuracy of this information.

The Phase I ESA was conducted in a manner consistent with that level of care and skill ordinarily exercised by members of the environmental profession under similar conditions. No other warranty or guarantee, expressed or implied, is included or intended in this report or otherwise.

The scope of this assessment does not purport to encompass every report, record, or other form of documentation relevant to the subject property being evaluated. The observations contained herein are made during site reconnaissance, review of ownership records, discussions with local government personnel, and review of readily accessible environmental databases. The Phase I ESA is based upon our professional judgment concerning the significance of the data collected and in no way attempts to forecast future site conditions.

6.0 Site Description

6.1 Location and Legal Description

Address: U.S. Army Corps of Engineers

Saint Paul District

Upper Saint Anthony Falls Lock and Dam

1 Portland Avenue Minneapolis, MN 55401

Legal Description: Fourth Principal Meridian, Minnesota

T29 N, R24W, Sec. 23, SE 1/4,

The area described contains 3.2 acres of land, more or less.



Figure 1 Upper Saint Anthony Falls Lock and Dam Subject Property

6.2 Site and Vicinity Description

Currently, the Upper Saint Anthony Falls subject property is home to a lock and dam, maintained and operated by the U.S. Army Corps of Engineers, Saint Paul District. The site is located along the Mississippi River within the city limits of Minneapolis, at about River Mile 854. A majority of the developed portion of the site is bound by the Mississippi River to the north, and the Central Mississippi Riverfront Regional Park along the right river bank (facing downstream).

Extensive commercial development of the Saint Anthony Falls did not begin until the 1850s. Industries included saw mills, grain mills, iron foundries, railways, switch yards, limestone quarries, and additional businesses to support the mills and their workers. In addition to developing the land, features of the Mississippi River were altered to grow the milling industry.

From 1959 to 1963 the USAF western locks were constructed on Upton Island, as authorized by the Rivers and Harbors act of 1937. A masonry dam, water canals, and a series of mills separated the island from the downtown area (Fig. 2).

Historically the western extent of Upton Island was utilized as a foundation for mills. Existing boring logs indicated surface soils on the island were almost entirely composed of fill or alluvial soils. Upton Island was excavated into bedrock for the USAF western locks construction (Fig. 3). Post construction soil borings describe a remnant fill layer containing cinder and ash in multiple borings within the parking area and adjacent access road.

After heavy industry left the vicinity of USAF, a series of remediation efforts were completed in part to revitalize the Minneapolis river front. In 1971 the Saint Anthony Falls Historic District was nominated to the National Register of Historic Places. Abandoned rail lines were removed, and contaminated industrial lands were remediated to allow for development. In addition to private dollars, the Brownfields Program provided assistance to several properties cleanup programs. Parks were also planned in the redevelopment. A portion of the right bank in the intermediate pool between USAF and Lower St. Anthony Falls Lock and Dam was leased by an aggregate supply company as a storage area. In 1988 the lease was terminated and the mills area was excavated to be preserved as Mill Ruins Park. Currently the ongoing riverfront revitalization project sites are host to a museum, a theatre, parks, store fronts, restaurants, hotels, offices, and residential housing.

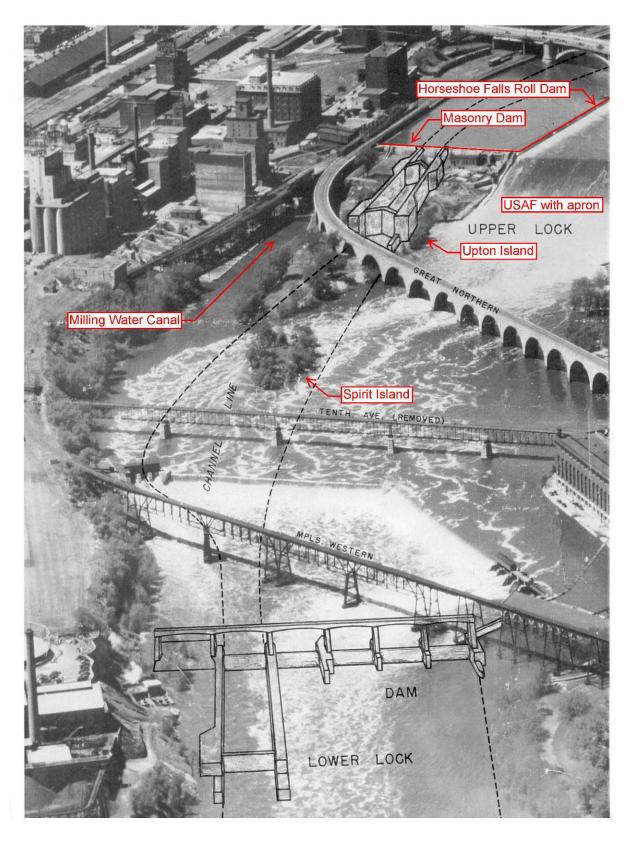


Figure 2 Pictorial Depiction of Saint Anthony Falls Locks and Dams



Figure 3 Upper Saint Anthony Falls Lock Construction

6.2.1 Site Geology

Most of downtown Minneapolis has moderate to no relief, which can be credited to the last glaciations that encompassed the area from 25,000 to 10,000 years ago. The present Mississippi River Valley from USAF to Saint Paul forms a relatively shallow gorge and was cut in the last 10,000-12,000 years during high melt-water discharge of the retreating glaciers. The Mississippi River at the location of USAF is about 1500 feet wide. Due to the presence of the river gorge the Mississippi River water surface is approximately 40-70 feet below the majority of downtown streets.

The surface soils at the subject property are fill, and/or alluvial/fluvial deposits of sand with gravel, silt, clay and limestone slabs. These soils overlie bedrock sedimentary rock units. In descending order the bedrock units are the Platteville Limestone Formation, the Glenwood Shale Formation, and the St. Peter Sandstone Formation.

In the project vicinity, the Platteville Limestone Formation is the cap rock of the Mississippi River bluffs. Above St. Anthony Falls the river bed is composed of this limestone and a remnant remains encased in concrete

at the current location of the falls. Beneath the project site the limestone ranges from 8-10 feet to non-existent. This formation pinches out upstream of USAF. Beneath the Platteville Limestone lies the more easily eroded Glenwood Shale Formation, this unit is composed of dark green to gray shale and sandy shale. The Glenwood Shale is approximately three to five feet thick locally. Beneath the shale lies the Saint Peter Sandstone Formation. The poorly cemented sandstone allows it to be easily eroded.

6.2.2 Site Hydrogeology

The USAF project location was previously an island. Today, a bluff and excavated mill race remain, partially separating the majority of the subject property from downtown Minneapolis. Groundwater in the vicinity of USAF flows generally to the east, towards and downriver of, the lock and dam. Groundwater elevation and flow are influenced by the river elevation and seasonal weather variations. The average water surface elevation of the USAF pool is 799 ft., and 750 ft. (1912 MSL) downstream as the Lower Saint Anthony Falls pool. Groundwater flowing from downtown Minneapolis towards the subject property, may discharge into the mill race then flow downstream into the Mississippi River.

The Glenwood Shale and the Platteville Limestone Formations are the top confining layers above the St. Peter Sandstone Aquifer. The Glenwood Shale is the primary aquatard, limiting downward groundwater percolation into the St. Peter Aquifer.

The permeability of the St. Peter Sandstone varies regionally. Groundwater in this aquifer flows towards, then follows the Mississippi River Valley down gradient (Kanivetsky, 1989).

6.3 Current Use of the Property

In 2015, in compliance with guidance from the U.S. Congress, the locks at USAF were closed for navigation and recreation. The lock structure proper is now part of the damming surface at Upper St. Anthony Falls. This allows the dam to continue to assist with water pool elevations for the City of Minneapolis water supply intake, hydroelectric power generation, and the preservation of Saint Anthony Falls itself. Public tours are provided by the National Park Service.

6.4 Adjoining Property Information

The adjoining properties are recreational in use. During the site reconnaissance the following properties were identified in the immediate vicinity:

Direction from Site	Use	Property Type
North	River	
South	Recreational	Vacant Land-commercial
West	Recreational Parking lot	Vacant Land-commercial Commercial-preferred
East	River/Rec.	Vacant Land-commercial

North of USAF, on the left bank (facing downstream) of the Mississippi River, is the University of Minnesota- St. Anthony Falls Hydraulics Laboratory, Xcel Energy Hydroelectric Plant, and Hennepin Island.

South of USAF across a remnant milling tail race, adjacent properties are the Central Mississippi Riverfront Regional Park, and the West River Parkway. Beyond the adjacent properties further east lies a series of commercial and residential properties.

6.5 Local Government and Past Owner Provided Information

USACE conducted in-person interviews with Michael DeRusha (USAF Lockmaster) on September 8th 2018. An electronic interview with Andri Dahlmeier with the MPCA was also conducted throughout January 2019. The purpose of the interview was to determine if there are any known past or present environmental concerns associated with the site.

There were no unusual conditions identified from the interviews. An asbestos report was referred to, indicating asbestos wrapping around utility piping in the lock buildings. This full report is available on the project site.

7.0 Records Review

7.1 Standard Environmental Records Sources

At the request of the USACE, Environmental Data Resources, Inc. (EDR) conducted a search of Federal and State databases containing potential or known sites of environmental contamination. The number of listed sites identified within a one

mile search radius are summarized in the following table. For a detailed listing of databases and findings, a copy of the EDR Radius Map Report has been included in Appendix A of this report.

Database List	Subject Property Listings	Total Number of Listings	Environmental Concerns Posed to Subject Property
CDL Sites	N	2	None
Federal NPL Sites	N	0	None
Federal Delisted NPL Site	s N	0	None
Federal CERCLIS Sites	N	1	None
Federal CERCLIS NFRAP S	ites N	2	None
RCRA CORRACTS Sites	N	2	None
RCRA TSD Facilities	N	1	None
RCRA SQG	N	20	None
RCRA LQG	N	20	None
RCRA-CESQG	Υ	199	None
Federal ERNS Sites	N	37	None
MN SPILLS Reports	N	398	None
Landfill/SW Disposal Site	s N	2	None
US Brownfield sites	N	7	None
State HW Sites	N	0	None
State CERCLIS Sites	N	5	None
State Institutional Contro	ol Sites N	14	None
MN delisted NLP Sites	N	1	None
MN PLP	N	2	None
MN AIRS Sites	N	19	None
MN Brownfield sites	N	199	None
MN SRS	Υ	372	None
MN Voluntary Cleanup Si	tes N	167	None
LUST/LAST Sites	Υ	178	None
UST/AST Sites	Υ	303	None

Upon review of the EDR report, the subject property is a previously listed underground storage tank (UST) petroleum leak site, a hazardous waste minimal quantity generator for used oil, and has one active 500 gallon diesel above ground storage tank (AST). Two UST's were removed in 1995, one 300 gallon diesel tank, and one 285 gallon tank holding fuel oil. During removal, the fuel oil tank was discovered leaking, and the site was remediated and closed.

There are three adjacent properties; The West River Parkway, Central Mississippi Riverfront Regional Park (CMRRP), and Mill Ruins Park. These properties are currently river corridor greenways. The West River Parkway and Central Mississippi Riverfront Regional Park properties are not identified with HTRW database hits. Mill Ruins Park (a portion of the CMRRP) was identified in the EDR search, as a previous Petroleum Brownfield site. The site had a Phase 2 investigation conducted, then was closed and reviewed in 2001, the same year the park was opened to public.

South of USAF, on the bluff above the lock and dam, is located an area of historic industrial use. There were several Brownfields, and Voluntary Investigation and Cleanup sites. These nearby sites are associated with historic milling, shipping, and supporting industries that have since have been rebuilt, remodeled or repurposed. Between these sites and the USACE subject property is the Central Mississippi Riverfront Regional Park, Mill Ruins Park, the West River Parkway, and a remnant water canal which serve to act as a buffer.

7.2 Physical Setting Sources

Physical setting sources were provided by the EDR GeoCheck Physical Setting Source Addendum unless otherwise noted. A copy of the GeoCheck report can be found in Appendix A of this report.

Groundwater flow direction was identified by the EDR AQUIFLOW Information System. The groundwater flow gradient shifts towards the Mississippi River, flowing east, through the assessment area. The GeoCheck report and site visit confirmed that no monitoring wells or water wells were identified on the subject property. Piezometers, which record water levels for dam monitoring, are present within the property.

The EDR report describes general surface soils as a loamy coarse sand, with well drained to excessively drained sands and gravel. USACE soil boring logs from preconstruction of the USAF locks indicated the surface portion of Uptown Island was composed entirely of fill. Post construction, logs from 1988 and 1991 describe remnants of that fill containing cinders. 2012 and 2015 borings (American Engineering Testing Inc.) on the subject property beneath a parking lot and an access road identified construction fill consisting of a silty sand with gravel and occasional cobbles. The lower portion of this fill also described cinders, concrete, and wood.

7.3 Historical Use

7.3.1 Sanborn Fire Insurance Maps

Historic fire insurance maps were requested from EDR and a search of the Sanborn Library, LLC was conducted. Certified Sanborn Maps were

available for the following years: 1885, 1890, 1904, 1912, 1949, 1950, 1952, 1966, and 1969. Historic maps are detailed drawings that show the locations and use of structures on a given property during a specific year. The maps were originally used by insurance companies to assess fire risk. A copy of the Sanborn Map Report can be found in Appendix B of this report.

There were no unusual entries identified from the Sanborn Fire Insurance Maps.

7.3.2 City Directories

Historic and current city directories of the subject property and subject property street were requested from EDR. City directories were obtained between 1920 and 2014, records were published about every 5 years. City directories have been published for cities and towns across the United States since the 1700s. Originally a list of residents, the city directory developed into a tool for locating individuals and businesses. A copy of the available information for the subject property can be found in Appendix C of this report.

There were no unusual entries identified from the city directories.

7.3.3 Topographical Maps

Historic topographic map coverage of the subject property was requested from EDR. Partial copies of the topographic maps can be found in Appendix D of this report. USGS topographic mapping was obtained for the years 1901, 1951, 1952, 1958, 1967, 1972, 1977, 1993, and 2013. Refer to the Topo Sheet Key in Appendix D for scale and other mapping details.

There were no unusual conditions identified from the topographic maps.

7.3.4 Aerial Photos

Historic aerial photos of the subject property were requested from EDR. Photo coverage was available for the following years: 1937, 1940, 1947, 1957, 1966, 1969, 1972, 1978, 1984, 1987, 1991, 1997, 2005, 2010, 2013, and 2017. A copy of the EDR aerial photo package can be found in Appendix E of this report. USACE historic aerial photos and sketches were also reviewed.

There were no unusual conditions identified from the aerial photos.

8.0 Site Reconnaissance

8.1 Methodology and Limiting Conditions

Site reconnaissance was conducted on September 5th, 2018 by Ashley Woods, geologist with the U.S. Army Corps of Engineers, St. Paul District. The inspector was unaccompanied during the site reconnaissance. Weather conditions at the time of the site reconnaissance were cloudy, warm (approximately 60° F), and breezy. During the inspection buildings were entered, and adjoining properties were only observed from public right-of-way. Photographs taken during the site reconnaissance can be found in Appendix F of this report.

8.2 Site Visit Findings

Note: All referenced photos can be found in Appendix F of this report.

8.3.1 Subject Property

- One diesel Above Ground Storage Tank (AST) and generator was encountered in the assessment area. No visible evidence of leaks were noted during the inspection and the diesel AST was installed over a spill containment structure. An emergency spill kit was readily available.
- Machine shops and the majority of chemical storage for this lock are located off site at the nearby USACE Lower Saint Anthony Falls property.
- General sound and organized housekeeping was observed.
- Two hydraulic cranes for emergency boat launches were noted in the assessment area. No visible evidence of leaks were visible during the inspection.
- An asbestos report pertaining to the subject property is available on site.

9.0 Conclusions

The U.S. Army Corps of Engineers has conducted a Phase I Environmental Site Assessment of the subject property in conformance with the scope and limitations of ASTM Standard Practice E 1527-13. This assessment revealed that there were no observed potential risks for contamination due to recognized environmental conditions on the subject property.

Based on the information obtained during the site reconnaissance and document review, **a Phase II** Environmental Site Assessment is not currently recommended for the subject property.

Phase I Environmental Site Assessment Report – USAF Disposition

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Appendix A

EDR Radius Map with GeoCheck

Appendix B

Certified Sanborn Map Reports

Appendix C

EDR City Directory Image Reports

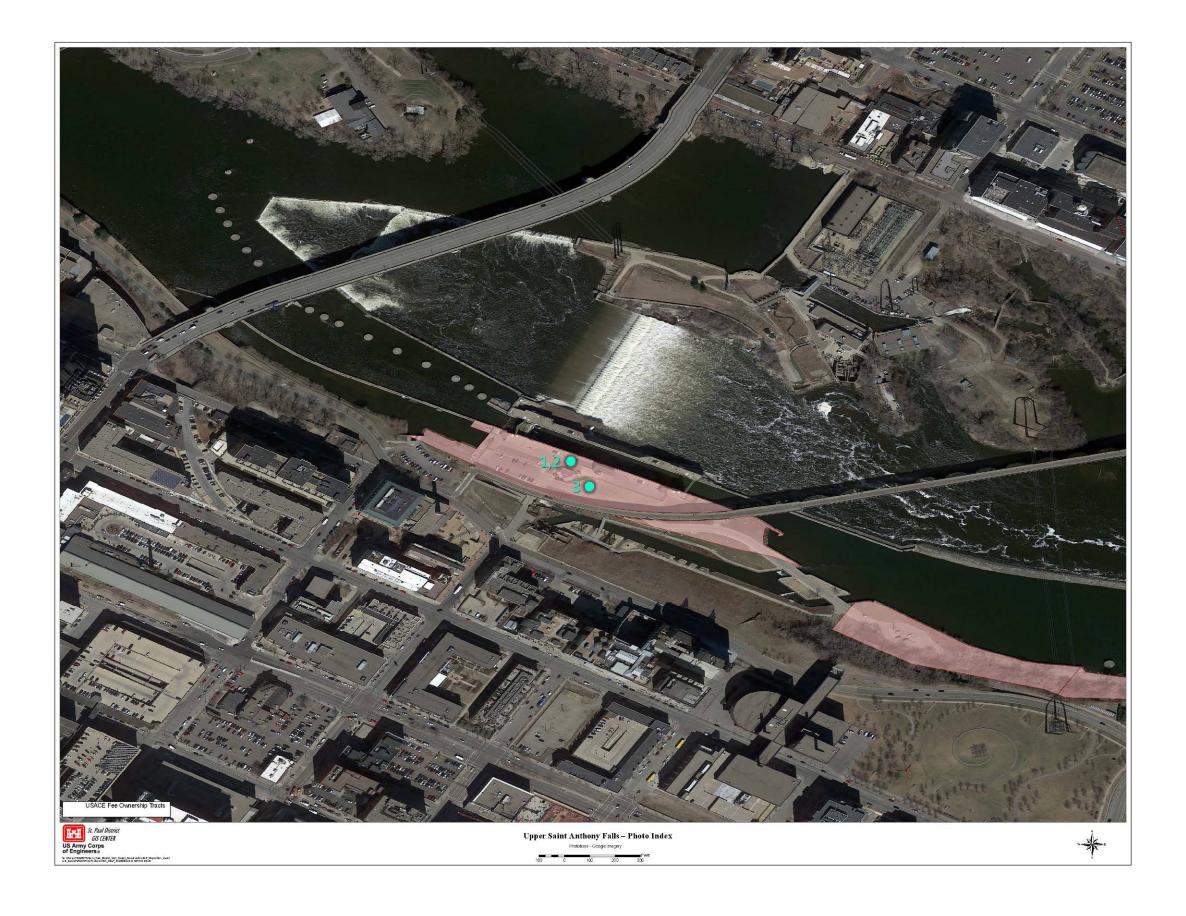
Appendix D

EDR Historical Topographic Map Reports

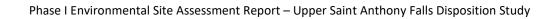
Appendix E

EDR Aerial Photo Decade Packages

<u>FIGURE</u>	<u>Page</u>
FIGURE 1. 500 GALLON DIESEL AST	4
FIGURE 2. GENERATOR	4
FIGURE 3. UTILITY BOX	5



Appendix F – Site Reconnaissance Photographs



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Appendix F – Site Reconnaissance Photographs



Figure 1. 500 Gallon Diesel AST



Figure 2. Generator



Figure 3. Utility Box