

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Commercial Office Building

45433 W Main Street, Nowhere, Marion County, Indiana

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<https://www.barrow.site/>

EXECUTIVE SUMMARY	i
1.0 INTRODUCTION.....	1
1.1 SCOPE OF SERVICES	1
1.2 NON-SCOPE SERVICES.....	2
1.3 SIGNIFICANT ASSUMPTIONS.....	2
1.4 LIMITATIONS AND DATA GAPS.....	3
1.5 USER RELIANCE.....	4
2.0 SUBJECT PROPERTY DESCRIPTION	5
2.1 PHYSICAL SETTING.....	5
3.0 HISTORICAL RECORDS REVIEW.....	7
3.1 CHAIN OF TITLE AND ENVIRONMENTAL LIENS	7
3.2 SANBORN FIRE INSURANCE MAPS.....	8
3.3 HISTORICAL AERIAL PHOTOGRAPHS	9
3.4 CITY DIRECTORIES	10
3.5 HISTORICAL TOPOGRAPHIC MAPS.....	12
4.0 REGULATORY DATABASE RECORDS REVIEW	13
4.1 VAPOR MIGRATION.....	16
5.0 LOCAL AGENCY INQUIRIES.....	17
6.0 INTERVIEWS AND USER PROVIDED INFORMATION.....	18
6.2 PREVIOUS REPORTS AND OTHER PROVIDED DOCUMENTATION.....	21
7.0 SUBJECT PROPERTY SITE INSPECTION AND RECONNAISSANCE.....	22
7.1 SUBJECT PROPERTY RECONNAISSANCE FINDINGS.....	22
7.2 ADJACENT PROPERTY RECONNAISSANCE FINDINGS	23
7.3 NON-SCOPE SERVICES.....	23
8.0 FINDINGS AND CONCLUSIONS	25
9.0 DECLARATION OF ENVIRONMENTAL PROFESSIONALS	26

LIST OF TABLES

TABLE 1. GEOPHYSICAL INFORMATION OF THE TARGET PROPERTY
TABLE 2. SUMMARY OF HISTORICAL FIRE INSURANCE MAPS
TABLE 3. SUMMARY OF HISTORICAL AERIAL PHOTOGRAPHS
TABLE 4. SUMMARY OF CITY DIRECTORY ABSTRACT FINDINGS
TABLE 5. SUMMARY OF HISTORICAL TOPOGRAPHIC MAPS
TABLE 6. SEARCH RADIUS AND LISTINGS OF DATABASES (FEDERAL)
TABLE 7. SEARCH RADIUS AND LISTINGS OF DATABASES (STATE/TRIBAL)
TABLE 8. AGENCY RECORDS REQUESTS
TABLE 9. USER QUESTIONNAIRE RESPONSE
TABLE 10. ADJOINING PROPERTIES SUMMARY
TABLE 11. SUMMARY OF FOIA AGENCY REQUESTS

APPENDICES

APPENDIX A. PROPERTY CARDS/MISC.
APPENDIX B. USER STATEMENT/ENV QUESTIONNAIRE
APPENDIX C. FOIA DEPARTMENT SEARCH
APPENDIX D. VFC/PREVIOUS ENV REPORTS
APPENDIX E. RADIUS FILE SEARCH REPORT
APPENDIX F. SANBORN MAPS
APPENDIX G. HISTORIC AERIALS
APPENDIX H. CITY DIRECTORIES
APPENDIX I. PHOTOS
APPENDIX J. PROFESSIONAL CREDENTIALS

Terms & Acronyms	
ACM	Asbestos Containing Material
AHERA	Asbestos Hazard Emergency Response Act
AST	Above Ground Storage Tanks
BGS	Below Ground Surface
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes. BTEX are components of gasoline and commonly used as analytical indicators of a petroleum hydrocarbon release.
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System.
CESQG	Conditionally exempt small quantity generator.
CFR	Code of Federal Regulations
DOT	U.S. Department of Transportation
EPA	U.S. Environmental Protection Agency
ERNS	Emergency Response Notification System.
ESA	Environmental Site Assessment
Hazardous Substance	According to CERCLA, (A) any substance designated pursuant to section 1321(b)(2)(A) of Title 33, (B) any element, compound, mixture, solution, or substance designated pursuant to section 9602 of this title; (C) any hazardous waste having characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (with some exclusions); (D) any toxic pollutant listed under section 1317(a) of Title 33;

Terms & Acronyms	
	(E) any hazardous air pollutant listed under section 112 of the Clean Air Act; and (F) any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action under section 2606 of Title 15.
Hazardous Waste	Solid waste, or combination of solid wastes, which due to quantity, concentration, or physical, chemical, or infectious characteristics may (A) cause, or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (B) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, or disposed of, or otherwise managed.
LQG	Large Quantity Generator.
LUST	Leaking Underground Storage Tank.
MCL	Maximum Contaminant Level. The limit on drinking water contamination that determines whether a supplier can deliver water from a specific source without treatment.
NESHAP	National Emissions Standard for Hazardous Air Pollutants The part of the Clean Air Act regulating the emissions of hazardous air pollutants.
NFRAP	No Further Remedial Action Planned.
NOV	Notice of Violation.
NPDES	National Pollutant Discharge Elimination System. The federal permit system for discharges of contaminated water.
NPL	National Priorities List.

Terms & Acronyms	
OSHA	Occupational Safety and Health Administration or Occupational Safety and Health Act
PACM	Presumed Asbestos-Containing Material.
PCB	Polychlorinated Biphenyl.
pCi/l	Pico Curies per Liter of Air. Unit of measurement for Radon and similar radioactive materials.
Radon	A radioactive gas resulting from radioactive decay of naturally-occurring radioactive materials in rocks and soils.
RCRA	Resource Conservation and Recovery Act.
RCRA Generators	EPA database of facilities that generate hazardous waste as part of their normal business operations.
RCRA CORRACTS/TSI	EPA database of RCRA facilities associated with treatment, storage, and disposal of hazardous materials which are undergoing "corrective action".
RCRA CORRACTS/TSDs	EPA database of facilities that report storage, transportation, treatment, or disposal of hazardous waste. Unlike Does not include RCRA facilities where corrective action is required.
REC	Recognized Environmental Conditions are defined by ASTM E1527-21
SDS	Safety Data Sheets. Forms identifying the physical and chemical traits of hazardous chemicals per OSHA's Hazard Communication Standard.
SPCC	Spill Prevention, Control and Countermeasures.
SPL	State Priority List.

Terms & Acronyms	
SQG	Small quantity generator.
SWF	Solid Waste Facility
TPH	Total Petroleum Hydrocarbons
TRI	Toxic Release Inventory.
TSCA	Toxic Substances Control Act.
USACE	United States Army Corps of Engineers
USC	United States Code
USGS	United States Geological Survey
USNRCS	United States Department of Agriculture-Natural Resource Conservation Service
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program
VOC	Volatile Organic Compounds

EXECUTIVE SUMMARY

Barrow Engineering, Inc. was retained by John & Jane Doe, Inc. (the "Users") to conduct a Phase I Environmental Site Assessment (ESA) of the property located at 45433 W Main Street, Nowhere, Marion County, Indiana (the "subject property"). This assessment was performed in general conformance with the scope and limitations of ASTM Standard Practice E1527-21 for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The purpose of this Phase I ESA is to identify, to the extent feasible, recognized environmental conditions (RECs) in connection with the subject property. This process is intended to permit the Users to satisfy one of the requirements to qualify for the landowner liability protections (LLPs) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The scope of work included a review of federal, state, and local regulatory records; an evaluation of historical land use through aerial photographs, city directories, and Sanborn maps; a visual reconnaissance of the subject property and adjoining properties; and interviews with relevant parties. User and property representative questionnaires were completed and incorporated into this assessment.

The subject property consists of approximately 2.1 acres of land identified as Parcel Numbers 00-XX-11-123-456.789-101 and 123456. It is currently improved with a multi-story commercial office building totaling approximately 100,000 square feet, housing multiple businesses. The site is located at latitude 39.00001° North and longitude 86.000002° West, at an elevation of approximately 593 feet above mean sea level. Primary access to the site is provided via W Main Street. Based on regional hydrogeological data and local topographic contours, shallow groundwater flow beneath the site is inferred to be toward the west, in the direction of the Winter River. Depth to groundwater is estimated to be between 2 and 8 feet below ground surface.

The structure, originally constructed in 1951, features fire-resistant framing with an exterior composed of brick and metal siding. The building is equipped with a built-up roof system. Internal climate control is provided by a central air conditioning system, and the facility is protected by an automated sprinkler system. On-site improvements include paved parking areas and a stormwater retention pond located on the southern portion of the 2.1-acre parcel.

The regional setting is characterized by the urban/suburban core of downtown Nowhere, IN, and land use in the vicinity of the subject property is a mix of recreational and residential development. Properties to the north and south are occupied by residential developments and associated surface parking. The eastern boundary consists of vacant land. To the west, the area contains multiple residential buildings and a recreational park.

This assessment did not include any testing or sampling of materials such as soil, groundwater, surface water, or building materials. Any specific limiting conditions or deviations encountered during the assessment, such as physical obstructions or data limitations, are discussed below in **Findings**.

FINDINGS

Recognized Environmental Conditions (RECs) are defined by the ASTM Standard Practice E1527-21 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.

No on-site RECs were identified during the course of this assessment.

Controlled Recognized Environmental Conditions (CRECs) are defined by the ASTM Standard Practice E1527-21 as a 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 controls (for example, activity and use limitations or other property use limitations).

No on-site CRECs were identified during the course of this assessment.

Historical Recognized Environmental Condition (HREC) is defined by the ASTM Standard Practice E1527-21 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 property to any controls (for example activity and use limitations, or other property use limitations).

No on-site HRECs were identified during the course of this assessment.

NON-SCOPE ENVIRONMENTAL CONSIDERATIONS

- Sampling and analysis for the presence of radon is not considered part of the scope of a Phase I ESA. According to the Map of Radon Zones published by the United States EPA in 1993, the subject property is located within Zone 1, which represents the highest potential for radon intrusion into indoor air at a level above the action level of 4 pCi/L. It may be necessary to conduct radon sampling in the future to determine if radon mitigation is needed for the subject property.
- The age of the subject property presents a risk for the presence of ACMs. Should routine operation and maintenance, or planned renovation and/or demolition activities potentially disturb any building materials, a thorough asbestos survey to identify ACM is required in accordance with the EPA NESHAP 40 CFR Part 61 prior to these activities.
- The age of the subject property also presents a risk for the presence of lead-based paint (LBP) and other lead-containing materials. A lead inspection by a certified lead inspector can determine the presence or absence of these materials. Any activities that may disturb LBP or other lead-containing materials at the subject property should be conducted with respect to local and federal regulations.

CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E1527-21 of 45433 W Main Street, Nowhere, Marion County, Indiana (the “subject property”). Any exceptions to, or deletions from, this practice are described in Sections 1.4, 1.5 and 1.6 of this report. This assessment has revealed no recognized environmental conditions, controlled recognized environmental conditions, historic recognized environmental conditions, or significant data gaps in connection with the subject property.

RECOMMENDATIONS

No Recognized Environmental Conditions (RECs) were identified in association with the subject property per ASTM E1527-21, and no further environmental investigation is warranted at this time. Non-scope concerns, as noted above, should be evaluated for further consideration.

1.0 INTRODUCTION

Barrow Engineering, Inc. was retained by John & Jane Doe, Inc. (the "Users") to conduct a Phase I Environmental Site Assessment (ESA) of the property located at 45433 W Main Street, Nowhere, Marion County, Indiana (the "subject property"). This assessment was performed in general conformance with the scope and limitations of ASTM Standard Practice E1527-21 for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The purpose of this Phase I ESA is to identify, to the extent feasible, recognized environmental conditions (RECs) in connection with the subject property. This process is intended to permit the Users to satisfy one of the requirements to qualify for the landowner liability protections (LLPs) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The scope of work included a review of federal, state, and local regulatory records; an evaluation of historical land use through aerial photographs, city directories, and Sanborn maps; a visual reconnaissance of the subject property and adjoining properties; and interviews with relevant parties. User and property representative questionnaires were completed and incorporated into this assessment. The subject property consists of approximately 2.1 acres of land identified as Parcel Numbers 00-XX-11-123-456.789-101 and 123456. It is currently improved with a multi-story commercial office building constructed in 1951, and totaling approximately 100,000 square feet. The site is located at latitude 39.000001° North and longitude 86.000002° West, at an elevation of approximately 593 feet above mean sea level. This assessment did not include any testing or sampling of materials such as soil, groundwater, surface water, or building materials. Any specific limiting conditions or deviations encountered during the assessment, such as physical obstructions or data limitations, are discussed in **Section 8**.

1.1 SCOPE OF SERVICES

This Phase I Environmental Site Assessment (ESA) was performed in accordance with the procedures pursuant to ASTM E1527-21, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process. The ESA was conducted and prepared by the Environmental Professionals (EPs) at Barrow Engineering, Inc. The purpose of this ESA is to assist John & Jane Doe, Inc. in developing information to identify recognized environmental conditions (RECs) associated with the subject property, 45433 W Main Street, Nowhere, Indiana. ASTM E1527-21 defines a REC 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. A de minimis condition is not a recognized environmental condition."

The scope of services for this assessment involved a multi-phased approach to identify potential environmental liabilities. A comprehensive review of federal, state, tribal, and local regulatory databases was conducted using standard ASTM search radii to identify facilities with known or suspected releases.

In addition to this comprehensive records review, a visual inspection of the subject property and adjacent properties was conducted, along with interviews of personnel associated with the property, and information requests from local government agencies. If available, user-provided information was requested as part of the standard due diligence and included in the findings. Historical data including aerial photographs, Sanborn Fire Insurance Maps, city directories, and topographic maps were analyzed with the above information to form a complete environmental picture of the subject property.

The site reconnaissance portion of the scope consisted of a visual and physical inspection of the 2.1-acre subject property. This included an evaluation of the building's exterior, common areas, maintenance facilities, and a representative sample of tenant spaces within the 100,000-square-foot office structure. The inspection focused on identifying indicators of hazardous substance or petroleum product use, storage, or disposal, as well as observing the current conditions of adjoining properties from the site boundaries and public thoroughfares.

No deviations from ASTM E1527-21 were identified for this assessment.

1.2 NON-SCOPE SERVICES

Additional services beyond the standard ASTM E1527-21 scope were not authorized for this assessment. The contract for services specifically excluded the evaluation of non-scope considerations that may impact business environmental risk. These exclusions encompass, but are not limited to, formal surveys for asbestos-containing materials, lead-based paint, radon, mold, and wetlands. In addition, some substances may be present on a property in quantities and under conditions that may lead to contamination of the property or of nearby properties but are not included in CERCLA's definition of hazardous substances (42 U.S.C. §9601(14)) or do not otherwise present potential CERCLA liability.

No subsurface investigations or analytical testing of any media were performed. Although the subject property building was constructed in 1951 and contains a hydraulic elevator system, these features were only observed during the standard site reconnaissance. They were not subjected to technical inspections or testing for regulatory compliance. The scope of this assessment was limited to identifying recognized environmental conditions as defined by the ASTM standard, and no additional environmental investigations were conducted at the time of this assessment. **Section 7.3** further elaborates on non-scope services as they relate to the subject property.

1.3 SIGNIFICANT ASSUMPTIONS

This Phase I Environmental Site Assessment (ESA) relies on several significant assumptions regarding the information provided by third-party sources and the physical characteristics of the subject property. It is assumed that all information obtained from government agencies, the Users, and property representatives is accurate and complete. While Barrow Engineering, Inc. has reviewed this information for internal consistency and obvious errors, the consultant cannot guarantee the absolute veracity of data provided by secondary sources.

Depth to groundwater and groundwater flow direction are assumed based on regional topographic contours and hydrogeological data from the United States Geological Survey (USGS) and Indiana Department of Natural Resources (IDNR). In the absence of site-specific monitoring wells, it is assumed that shallow groundwater flow generally follows the local topography toward the West, specifically toward the Winter River. Actual subsurface conditions may vary due to localized geological features or underground utilities.

The subject property is assumed to be correctly identified by the legal descriptions and parcel numbers provided by the Users and local assessor records. This assessment assumes that the 100,000-square-foot commercial office building has remained largely consistent in its structural footprint since its reported construction in 1951, based on the review of historical Sanborn Fire Insurance Maps and aerial photography. Any deviations from these assumptions that may impact the identification of recognized environmental conditions (RECs) are addressed in the Findings and Conclusions sections of this report.

1.4 LIMITATIONS AND DATA GAPS

This Phase I Environmental Site Assessment is subject to certain limitations inherent in the investigative process. The findings and conclusions are based on the conditions of the subject property as they existed at the time of the site reconnaissance and the information available through reasonably ascertainable sources. As specified in the ASTM E1527-21 standard, this assessment did not include the observation of conditions beneath floors, above ceilings, or behind finished walls. Furthermore, the evaluation was limited to the areas that were physically accessible at the time of the inspection.

Exceptions and/or limitations to Standard Practice ASTM E 1527-21 are typically encountered during Phase I ESAs. These may occur in the form of data failures, when all of the standard historical resources that are reasonably available and useful have been considered and yet the objectives have not been met. A data failure is not unusual in attempting to identify the property use at five-year intervals back to a property's first known use or construction (whichever is earlier).

Any ESA may be further limited by an inability to conduct interviews with individuals possessing historic knowledge of the subject property, and/or an inability to perform a review of records from local agencies due to time constraints resulting from information requests that cannot be completed in a reasonable period with respect to the production of a final ESA report. Both limitations constitute a significant data gap.

No significant physical obstructions or constraints were encountered during the site visit that prevented a thorough reconnaissance of the 2.1-acre property or the 100,000-square-foot commercial office building. No deviations from ASTM E1527-21 were identified for this assessment. The scope of work was completed in its entirety as defined by the standard practice and the agreement between the Users and Barrow Engineering, Inc.

The site reconnaissance was conducted on October 3, 2025. Access was obtained to the 100,000-square-foot commercial office building, including the main lobby, common hallways, utility rooms, maintenance areas, and the elevator machine room. A representative sample of commercial tenant

spaces was also inspected. The reconnaissance of the 2.1-acre property included the building's exterior, the northern area containing pad-mounted transformers, and the southern portion of the site where a stormwater retention pond is situated.

Observations were limited to areas that were visually and physically accessible at the time of the visit. No significant limiting conditions, such as physical obstructions, locked gates, or adverse weather, were encountered that prevented a thorough inspection of the property boundaries or the building's periphery. As per the authorized scope, no testing or sampling of soil, groundwater, or building materials was performed.

1.5 USER RELIANCE

This report is prepared for the exclusive use of John & Jane Doe, Inc. (the "Users") and their legal counsel. No other person or organization is entitled to rely upon any part of this report without the prior written consent of Barrow Engineering, Inc. and the Users. The release of this report to third parties is at the discretion of the Users or their counsel; however, such disclosure does not constitute a grant of reliance. Any third party that relies on this report with permission agrees to hold Barrow Engineering, Inc. harmless from any claims arising out of such use or reliance. The assessment followed the ASTM E1527-21 standard. The scope of services included a search of reasonably ascertainable federal, state, and local regulatory databases; a review of historical land use records including aerial photography, Sanborn maps, and city directories; and a physical reconnaissance of the 2.1-acre subject property. Additionally, interviews were conducted with property management, and the User and owner questionnaires were completed and reviewed. No sampling or analytical testing of soil, groundwater, vapor, or building materials was performed. The assessment did not include an evaluation of non-scope considerations such as asbestos-containing materials, lead-based paint, radon, mold, or wetlands. Observations were restricted to areas that were visually and physically accessible during the October 3, 2025, site visit. No deviations from the standard practice were identified.

An environmental site assessment meeting or exceeding this practice and completed less than 180 days prior to the date of acquisition of the property or (for transactions not involving an acquisition) the date of the intended transaction, is presumed to be valid.

A representative of John & Jane Doe, Inc. completed the User Questionnaire on September 22, 2025. The User reported no knowledge of any environmental cleanup liens or activity and use limitations (AULs), such as engineering controls or institutional controls, filed or recorded against the 2.1-acre subject property. The User indicated no specialized knowledge or experience related to the property or nearby properties, nor any knowledge of past uses, specific chemicals, spills, or environmental cleanups.

2.0 SUBJECT PROPERTY DESCRIPTION

The subject property is located at 45433 W Main Street in Nowhere, Marion County, Indiana 46225. The site is situated within Center Township at latitude 39.00001° North and longitude 86.000002° West. The regional setting is characterized by the urban/suburban core of downtown Nowhere.

The subject property consists of approximately 2.1 acres of land, identified by the Marion County Assessor as Parcel Numbers 00-XX-11-123-456.789-101 and 123456, and is improved with a single commercial office building encompassing approximately 100,000 square feet, housing multiple businesses. The structure, originally constructed in 1951, features fire-resistant framing with an exterior composed of brick and metal siding. The building is equipped with a built-up roof system. Internal climate control is provided by a central air conditioning system, and the facility is protected by an automated sprinkler system.

Primary access to the site is provided via W Main Street, with on-site improvements including paved parking areas and a stormwater retention pond located on the southern portion of the 2.1-acre parcel.

The topography of the subject property and the immediate vicinity is generally level, with a regional elevation of approximately 593 feet above mean sea level. Based on regional hydrogeological data and local topographic contours, shallow groundwater flow beneath the site is inferred to be toward the west, in the direction of the Winter River. Depth to groundwater is estimated to be between 2 and 8 feet below ground surface.

Land use in the vicinity of the subject property is a mix of recreational and residential development. Properties to the north and south are occupied by residential buildings and associated surface parking. The eastern boundary is adjacent to vacant land. To the west are more residential structures and a park.

2.1 PHYSICAL SETTING

The subject property is depicted on the United States Geological Survey (USGS) 7.5 Minute Topographic Map, Nowhere West, Indiana Quadrangle (2019). The site is situated at an elevation of approximately 593 feet above mean sea level. The local topography is generally level, with surface drainage appearing to follow the regional slope toward the west.

Regional geological data obtained from the Natural Resource Conservations Service Web Soil Survey (WSS) indicates that the site is underlain by multiple deposit types primarily consisting of surface material as urban land complex, which is common in densely developed metropolitan settings where the original soil profile has been significantly altered or covered by impervious surfaces.

Based on the Unconsolidated Aquifers of Marion County Potentiometric Surface Map, the shallow groundwater flow direction beneath the subject property is inferred to be toward the west, discharging into the Winter River. The Winter River is the nearest major surface water body, located approximately 0.5 miles west of the site. Depth to the water table in the vicinity is estimated to range from 2 to 8 feet below ground surface.

According to the U.S. Environmental Protection Agency (EPA), the subject property is located in Radon Zone 1. This classification indicates a high potential for elevated indoor radon levels, with a predicted average indoor screening level greater than 4.0 picoCuries per liter (pCi/L). Review of Federal Emergency Management Agency (FEMA) data indicates that while some nearby parcels are located within the 100-year floodplain, the subject property itself is not mapped within an estimated 100-year floodplain zone. Historical topographic maps were not available for review during this assessment.

Table 1. Geophysical Information of the Subject Property		
Geophysical Setting Information		Source
Subject Property Elevation	Approximately 593 feet above sea level (NGVD).	Subject Property Reconnaissance, 10/3/25; EDR Report, 09/22/25
Surface Runoff/ Topographic Gradient	North-Northwest	
Closest Surface Water	Winter River; 0.5 mi. West	
Soil Characteristics		
Soil Types	Christiana-Urban land complex	Natural Resource Conservation Service Web Soil Survey, obtained 11/14/25
	Christiana-Urban land complex	
	Iuka-Urban land complex	
	Sunnyside-Urban land complex	
	Sunnyside-Urban land complex	
	Udorthents, clayey, smoothed	
Geology/Hydrogeology		
Description	IK, Mesozoic Era and Cretaceous System	EDR Report, 09/22/25
Estimated Depth to First Occurrence of Groundwater	Approximately 2.86 feet	EDR Report, 09/22/25. Based on USGS water well located 2,717 feet northeast from the subject property.
*Hydrogeologic Gradient	The hydrogeologic gradient appears to be to the West	

3.0 HISTORICAL RECORDS REVIEW

A review of standard historical sources was conducted to develop a chronology of the subject property's use and to identify past activities that may have resulted in recognized environmental conditions. The research included an evaluation of Sanborn Fire Insurance Maps, historical aerial photographs, and city directories. The subject property was identified as vacant land as early as 1887. Development began in approximately 1951 with the construction of a school. This use continued for several decades before the site was redeveloped with the current commercial office structure. Standard historical records researched are elaborated on in the sections below.

3.1 CHAIN OF TITLE AND ENVIRONMENTAL LIENS

A chain-of-title report or deed history was not available for review. Information regarding the chronological sequence of ownership for the subject property from its first developed use to the present was therefore not reviewed. Historical use and occupancy information, which may indicate past ownership interests, was evaluated using other standard historical sources as described in the historical review. Additionally, no environmental liens were found in connection to the subject property.

3.2 SANBORN FIRE INSURANCE MAPS

A review of historical Sanborn Fire Insurance Maps was conducted to evaluate the development history of the subject property and to identify specific land uses in the surrounding area. The maps provided coverage for the subject property and adjacent blocks for the years 1887, 1898, 1908, 1914, 1927, 1941, 1950, 1956, 1960, 1965, and 1969. Maps from 1887-1950 depicted the subject property as vacant land, while subsequent maps documented the establishment and expansion of a large-scale educational facility. The following table provides a detailed summary of the observations made during this review.

Table 2. Summary of Historical Fire Insurance Maps	
	Description
Target Property	1887: The subject property is undeveloped and vacant. 1898 - 1969: The subject property is observed as developed with the current structure. No significant changes to the subject property are evident in the remaining available maps.
North	1887 - 1914: Residential dwellings are observed directly north. A horse stable is shown NE of the subject property. 1927 - 1941: There is no discernable change. 1950 - 1960: The stables are no longer present and multiple two-story residential dwellings have been built in their place. 1965: No significant change is visible. 1969: Additional residential dwellings have been developed north of the subject property.
East	1887 - 1969: There are no developments. Land remains vacant.
West	1887 - 1941: There are no developments west of the subject property. 1950 - 1956: Residential subdivisions and a construction site have been developed. 1960: A park is under development. 1965: The park is fully developed. 1969: There is no discernable change.
South	1887: There are no developments south of the target property. 1898 - 1927: A 2-story residential dwelling has been constructed. 1941: A second 2-story residential dwelling has been constructed. 1950 - 1969: There is no discernable change.

3.3 HISTORICAL AERIAL PHOTOGRAPHS

A review of historical aerial photographs was conducted to evaluate the development history of the subject property and the surrounding area. Historical aerial imagery for the subject property was reviewed for the years 1941, 1950, 1956, 1962, 1966, 1972, 1978, 1979, 1986, 1990, 1995, 2000, 2005, 2010, 2015, 2020, and 2024. The photographs were evaluated for indications of significant land disturbances, industrial activities, or other features of environmental concern. The following table provides a detailed summary of the observations made during this review.

Table 3. Summary of Historical Aerial Photographs	
	Description
Target Property	1941: The subject property is improved with the current structure in this image. 1950 - 2024: No noticeable changes after 1952.
North	1941: Residential dwelling units are visible, as well as a commercial/industrial building NE of the subject property. 1950 - 1956: The area has more residential dwellings. The commercial/industrial building is no longer visible. 1962 - 1978: Additional residential dwellings have been constructed. 1979 - 2024: No significant changes occur north of the target property.
East	1941 - 2024: Area east of the subject property is vacant and undeveloped.
West	1941: The area west of the target property is largely undeveloped. 1952: Residential subdivisions and a construction site are visible. 1956 - 1966: A park has been developed. 1972 - 1995: More residential development is visible west of the subject property. 2000 - 2024: Area west of the subject property is relatively unchanged.
South	1941: The area south of the subject property shows a residential dwelling. 1950: A second residential dwelling has been constructed. 1956 - 2024: No significant changes are visible south of the subject property.

3.4 CITY DIRECTORIES

City directories were reviewed at approximately five-year intervals for the subject property and surrounding addresses for the period between 1925 and 2005 to identify historical occupants and potential environmental concerns. The following table provides a detailed summary of this review.

Table 4. Summary of City Directory Abstract Findings	
Year(s)	Listed Occupants
Subject Property	
1925-1950	No Listings
1955-1990	-112, 116, 118, and 120 W Main St.: Riverside Gardens School -120 W Main St.: Riverside Community Chapel
1995-2005	-116, 118, 120 and 132 W Main St.: Riverside Gardens Shops -132 W Main St.: Riverside Community Health Club
North Adjacent Properties	
1925	92 32 th St.: 7 Riverside Gardens Dwellings
1960	-94 32 th St.: Riverside Gardens Property Office -101, 103, 105, 107, 109, 111, 113, 117, 119, 121, 123, 125, 127, 129, 131, 135, 93, 95, 97, 99, 101, 103, and 105 33 rd St.: Riverside Gardens Residences -153 Maple Ave.: Riverside Gardens Residences
1964	-94 32 th St.: Riverside Gardens Property Office -101, 103, 105, 107, 109, 113, 115, 117, 119, 121, 123, 125, 127, 129, 131, 135, 93, 95, 97, 99, 101, 103, and 105 33 rd St.: Riverside Gardens Residences -153 Maple Ave.: Riverside Gardens Residences
1969	-92 33 rd St.: Riverside Gardens Residences -151 Maple Ave.: Riverside Gardens Residences -153 Maple Ave.: Riverside Gardens Residences
East Adjacent Properties	
1925-2005	No Listings
West Adjacent Properties	
1925-1950	No Listings
1950	-1301, 1303, 1305 and 1311 Garden St.: W Riverside Residences
1955	-1299, 1301, 1303, 1305, 1307 and 1311 Garden St.: W Riverside Residences
1960	-1299, 1301, 1303, 1305, 1307 and 1311 Garden St.: W Riverside Residences -1400, 1450 and 1500 Garden St.: Riverside Gardens Park
1965-2025	No change in listings

Table 4. Summary of City Directory Abstract Findings

South Adjacent Properties	
1925-1940	-107, 109, 125, 129, 131, 133, 135, 93, 95, 97, and 101 W Main St: Riverside Gardens Residences -101 W Main St: Riverside Gardens Residences -151 Maple Ave: Riverside Gardens Residences
1945-2005	-107, 109, 125, 129, 131, 133, 135, 137, 139, 141, 93, 95, 97, and 101 W Main St: Riverside Gardens Residences -101, 103 W Main St: Riverside Gardens Residences -151 Maple Ave: Riverside Gardens Residences

3.5 HISTORICAL TOPOGRAPHIC MAPS

United States Geological Survey (USGS) Historical Topographic Maps were reviewed to evaluate potential RECs associated with the subject property and surrounding development. These maps can indicate significant changes in grading, the placement of fill material, or modifications to natural drainage patterns. Maps were available for the following years: 1899, 1900, 1906, 1945, 1950, 1951, 1957, 1965, 1971, 1979, 2014. The following table provides a summary of this review.

Table 5. Summary of Historical Topographic Maps	
	Description
Target Property	1899: Subject property is vacant. 1900-1950: There is no discernable change. 1951 - 2014: Subject property contains the current building configuration.
North	1899 - 1906: Residential structures are visible. 1945 - 1950: Additional residential structures are visible. 1951-2014: There is no discernable change.
East	1899-2014: Adjacent property to the east is vacant.
West	1899: Residential structures are visible. 1900-1906: There is no discernable change. 1945: Additional residential structures are visible. 1951 - 2014: There is no discernable change.
South	1899: Residential structures are visible. 1900 - 1906: There is no discernable change. 1945: Additional residential structures are visible. 1950 - 2014: There is no discernable change.

4.0 REGULATORY DATABASE RECORDS REVIEW

Barrow Engineering, Inc. contracted a search of federal, state, tribal, and local databases to identify known or suspected sites of environmental contamination and potential RECs relevant to the subject property. The search was conducted by EDR on September 22, 2025, using the subject property coordinates and an elevation of approximately 593 feet above mean sea level. The search distances utilized were in accordance with the approximate minimum search distances specified in the ASTM E1527-21 standard. The subject property was not identified in any of the regulatory databases searched, and relevant findings are summarized below.

Table 6. Search Radius and Listings of Databases (Federal)

Database	Description	Radius (miles)	Subject Property	Listings
NPL	EPA database of uncontrolled or abandoned hazardous waste facilities listed for priority remedial action under the Superfund Program.	1	Not Listed	0
NPL (Delisted)	Facilities that have been removed from the NPL.	0.5	Not Listed	0
CERCLIS	EPA database of facilities that are undergoing or have undergone investigation for a release or threatened release of hazardous substances pursuant to the CERCLA of 1980.	0.5	Not Listed	0
CERCLIS NFRAP	CERCLIS/NFRAP refers to facilities that have been removed and archived from EPA's inventory of CERCLA sites.	0.5	Not Listed	1
RCRA CORRACTS	The EPA maintains a database of RCRA facilities associated with treatment, storage, and disposal (TSD) of hazardous waste that are undergoing "corrective action." A "corrective action" order is issued when there has been a release of hazardous waste or constituents into the environment from a RCRA facility.	1	Not Listed	0
RCRA-TSDF; RCRA CORRACTS TSD	EPA database of facilities reporting treatment storage disposal or transportation of hazardous waste. Does not include RCRA facilities where corrective action is required.	0.5	Not Listed	0
RCRA Generators	Facilities that generate hazardous waste as part of their normal business practices.	0.25	Not Listed	4
IC / EC	Database of sites with institutional and/or engineering controls in place. IC can include administrative measures (restrictions relative to groundwater, construction, property use, and	0.5	Not Listed	0

Table 6. Search Radius and Listings of Databases (Federal)

Database	Description	Radius (miles)	Subject Property	Listings
	post remediation maintenance). Deed restrictions are typically required as part of ICs. EC can include caps, building foundations, liners, and treatment methods to prevent contaminant migration.			
ERNS	Emergency Response Notification System (ERNS) is an EPA database of reported releases of petroleum and hazardous substances to the air, soil and/or water.	0.001	Not Listed	0

Table 7. Search Radius and Listings of Databases (State/Tribal)				
Database	Description	Radius (miles)	Subject Property	Listings
NPL	State and tribal equivalent CERCLIS. Contains information on releases of oil and hazardous materials that have been reported to DDOE.	1.0	Not Listed	Not searched by EDR
SHWS	State and/or Tribal database of solid waste facilities located within the District of Columbia. The database information may include the facility name, class, operation type, area, estimated operational life, and owner.	1.0	Not Listed	0
Landfill/ Solid Waste	State and/or Tribal database of leaking underground storage tanks in the District of Columbia	0.5	Not Listed	0
LUST/LAST	State and/or Tribal database of registered storage tanks in the District of Columbia, which may include the owner, and location of the tanks.	0.5	Not Listed	17
UST/AST	State and/or Tribal database of underground storage tanks in the District of Columbia.	0.25	Not Listed	8
Brownfields	State and/or Tribal facilities included as Voluntary Cleanup Program sites.	0.5	Not Listed	14

The database search identified several facilities within the search radii. The most significant nearby listing is RKE LLC, located at 16 E. Vervain Street, approximately 574 feet north-northeast of the subject property. This facility is situated at a higher relative elevation and is listed in the State Cleanup Program (SCP) and ULCERS databases due to a historical release of trichloroethylene (TCE) into the groundwater. According to the regulatory records, the site was granted No Further Action (NFA) status by the Indiana Department of Environmental Management (IDEM) on February 12, 2020. This listing does not represent a REC for the subject property because the regulatory agency has confirmed that cleanup activities were completed to its satisfaction.

Universal Outfitters Inc., located at 511 S. Beacon Avenue, is situated approximately 629 feet north-northeast and east-northeast of the subject property. This facility is listed in the EPA UST, LUST, and RCRA databases. The site contains three closed gasoline underground storage tanks (USTs) and received NFA status for a historical release.

Jemson Enterprises, located at 23 W. Vervain Street, is approximately 467 feet northwest of the subject property at a lower relative elevation. This site is listed in the LUST database and also maintains NFA

status. Neither of these listings represents a REC for the subject property based on their regulatory closure status and topographic positions.

This assessment has not revealed evidence of recognized environmental conditions (RECs) in connection with the subject property. As detailed in the Findings, minor data gaps were identified during the course of this assessment.

4.1 VAPOR MIGRATION

A vapor encroachment condition (VEC) evaluation was performed to assess the potential for subsurface vapor-phase migration of hazardous substances or petroleum products to the subject property. This analysis followed the tiering process outlined in ASTM E2600-22, focusing on nearby facilities with documented releases of volatile organic compounds (VOCs) or petroleum hydrocarbons. As noted in the regulatory records review, several facilities were identified within the default search distances for vapor migration. The primary source of concern is the RKE LLC site, located approximately 574 feet north-northeast of the subject property, which had a historical release of trichloroethylene (TCE). While this site received No Further Action (NFA) status from the Indiana Department of Environmental Management (IDEM) on February 12, 2020, the proximity and high volatility of chlorinated solvents were specifically evaluated.

Regulatory closure documentation for the RKE LLC site indicates that cleanup activities for soil and groundwater were completed to the satisfaction of IDEM. Although NFA status typically addresses direct contact and ingestion pathways, the regulatory closure of the case serves as the primary basis for assessing vapor risk. Given that the case is closed and the source has been addressed to regulatory standards, the potential for significant vapor encroachment from this off-site source is considered low. Additional facilities, including Universal Outfitters Inc. (629 feet NNE) and Jemson Enterprises (467 feet NW), also maintain NFA status for historical petroleum releases. Petroleum hydrocarbons generally biodegrade more rapidly in the subsurface than chlorinated solvents, further reducing the likelihood of vapor-phase migration over these distances.

During the site reconnaissance conducted on October 3, 2025, no evidence of significant subsurface penetrations, such as unsealed sumps or large floor cracks, was observed in the 100,000-square-foot commercial office building that would provide preferential pathways for vapor intrusion. The building is constructed with a concrete basement. No chemical odors or other sensory indicators of vapor-phase contaminants were noted during the inspection. Based on the regulatory closure of nearby release sites and the distance to active petroleum or VOC facilities, it does not appear that a vapor-phase migration concern currently exists at the subject property.

5.0 LOCAL AGENCY INQUIRIES

Local and state agencies were contacted to identify records of site-specific permits, enforcement actions, hazardous materials use, storage, unauthorized releases, or other environmental concerns that could constitute a REC relative to the subject property. as well as information regarding Activity and Use Limitations (AULs) that may restrict property development or use. This process supplements the standard database search by accessing localized files that may not be captured in federal or state registries. A reasonable attempt was made to identify and contact relevant agencies that may possess knowledge or records pertaining to environmental concerns associated with the subject property. Depending on the state and locality of a subject property, agencies that may be typically included in this portion of the records review for a Phase I ESA are the planning department, building department, health department, fire department, department of the environment and department of public works. The following inquiries and responses were sent in regards to local agency environmental records for the subject property:

Table 8. Agency Records Requests	
Agency	Description
Indianapolis Fire Dept.	Contacted 11/20/2025, responded no relevant data
Marion County Public Health Dept.	11/14/2025, 11/17/2025 responded no relevant data
Marion County Buildings Dept.	11/12/2025, 11/14/2025 responded no relevant data

6.0 INTERVIEWS AND USER PROVIDED INFORMATION

Pursuant to ASTM E1527-21, interviews were conducted and questionnaires were distributed to parties knowledgeable about the subject property to identify potential environmental concerns. John & Jane Doe, Inc., completed the User Questionnaire on September 22, 2025. The User reported no knowledge of environmental liens, activity and use limitations (AULs), or specialized knowledge regarding the property. The User further indicated that the purchase price reflects fair market value and that no commonly known information suggests the presence of releases or threatened releases. These responses are summarized in the table below.

Sally Ride, Vice President of Asset Management, completed the owner/occupant questionnaire on October 3, 2025. Ms. Ride has been associated with the 2.1-acre property for approximately six years. She reported no knowledge of hazardous substance releases, historical industrial uses such as dry cleaning or gas stations, or the presence of underground storage tanks (USTs). Additionally, Jed Shepherd, Maintenance Manager for the subject property was interviewed during the site reconnaissance on October 3, 2025, and provided no information indicating environmental concerns. His responses are also summarized in the table below.

Interviews with past owners, operators, and occupants were not conducted as these parties were not available within the timeframe of this assessment. Information regarding local government officials is incorporated into the regulatory records review.

The responses from the interviews and questionnaires are provided in the tables below. These responses offer a comprehensive view of the subject property's history and current status as reported by knowledgeable parties.

INTERVIEW WITH SITE REPRESENTATIVE

The site representative provided information regarding the current operational status of the 2.1-acre property. The interview did not identify any known environmental concerns, as detailed in the following table. Maintenance staff present during the site reconnaissance did not identify any known environmental conditions.

PRIOR OWNERS AND OCCUPANTS

Past owners, operators, and occupants were not available for interview during the course of this assessment.

USER INFORMATION

The User provided detailed information through the ASTM User Questionnaire. The specific responses regarding environmental liens, activity and use limitations, and property history are detailed in **Table 9** below.

Table 9. User Questionnaire Responses	
User Questionnaire Item	User's Response Yes/No
<i>Environmental liens that are filed or recorded against the property (40 CFR 312.25).</i> Did a search of recorded land title records (or judicial records where appropriate) identify any environmental liens filed or recorded against the property under federal, tribal, state or local law?	No
<i>Activity and use limitations that are in place on the property or that have been filed or recorded against the property (40 CFR 312.26(a)(1)(v) and vi)).</i> Did a search of recorded land title records (or judicial records where appropriate) identify any activity and use limitations (AULs), such as engineering controls, land use restrictions or institutional controls that are in place at the property and/or have been filed or recorded against the property under federal, tribal, state or local law?	No
<i>Specialized knowledge or experience of the person seeking to qualify for the LLP (40 CFR 312.28).</i> Do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business?	Yes
<i>Relationship of the purchase price to the fair market value of the property if it were not contaminated (40 CFR 312.29).</i> Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?	Yes

Table 9. User Questionnaire Responses	
User Questionnaire Item	User's Response Yes/No
<i>Commonly known or reasonably ascertainable information about the property (40 CFR 312.30).</i> Are you aware of commonly known or reasonably ascertainable information about the property that would help the environmental professional to identify conditions indicative of releases or threatened releases? For example, a. Do you know the past uses of the property? b. Do you know of specific chemicals that are present or once were present at the property? c. Do you know of spills or other chemical releases that have taken place at the property? d. Do you know of any environmental cleanups that have taken place at the property?	Yes-school No No No
<i>The degree of obviousness of the presence or likely presence of contamination at the property, and the ability to detect the contamination by appropriate investigation (40 CFR 312.31).</i> Based on your knowledge and experience related to the property are there any obvious indicators that point to the presence or likely presence of releases at the property?	No

In order to qualify for one of the Landowner Liability Protections (LLPs) offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "Brownfields Amendments"), the user must conduct the following inquiries required by 40 CFR 312.25, 312.28, 312.29, 312.30, and 312.31. These inquiries must also be conducted by EPA Brownfields Assessment and Characterization grantees. The user should provide the following information to the environmental professional. Failure to conduct these inquiries could result in a determination that "all appropriate inquiries" is not complete.

6.2 PREVIOUS REPORTS AND OTHER PROVIDED DOCUMENTATION

No previous environmental site assessment reports, site investigation reports, or environmental compliance audits were provided by the User or the property owner for review during this assessment. Additionally, no documentation regarding site-specific environmental permits, such as wastewater discharge permits or underground storage tank registrations, was made available for evaluation.

Information regarding environmental liens and activity and use limitations (AULs) was requested from the User; however, a formal environmental lien search report or title abstract was not provided. As noted in the preceding sections, the User indicated no knowledge of such encumbrances in the completed questionnaire. No other historical documents, such as chain-of-title reports or prior geotechnical studies, were provided for evaluation. The assessment of the subject property's history and regulatory status relied on the resources independently obtained by Barrow Engineering, Inc., as detailed in the respective sections of this report.

7.0 SUBJECT PROPERTY SITE INSPECTION AND RECONNAISSANCE

The objective of the subject property site inspection and reconnaissance was to obtain information indicating potential RECs in connection with the subject property. A site reconnaissance of the 2.1-acre subject property was conducted on October 3, 2025, to identify features, activities, or conditions indicative of a release or material threat of a release of hazardous substances or petroleum products. The subject property was visually and/or physically observed and any structure(s) located on the property (to the extent that they are not obstructed by bodies of water, adjacent buildings, or other obstacles) were observed. Observations were conducted by walking the periphery of the site and all structures, as well as viewing the property from adjacent public thoroughfares. Access was provided to the 100,000-square-foot commercial office building, and a representative sample of the interior of the subject property, accessible common areas expected to be used by occupants or the public (such as lobbies, hallways, utility rooms, recreation areas, etc.), maintenance and repair areas, and occupant spaces, was visually and/or physically observed.

7.1 SUBJECT PROPERTY RECONNAISSANCE FINDINGS

The subject property is improved with a single 100,000-square-foot commercial office building situated on approximately 2.1 acres. During the site reconnaissance, chemical storage was observed to be limited to maintenance and tenant-related materials. Three 1-gallon containers of Clear Glide lubricant and a flammable safety cabinet containing small quantities of paint, polyurethane, and oils were observed in the basement utility room. Additionally, eleven 50 lb. bags of Fast Setting Quickrete were staged on a pallet outside the loading dock, located on the western edge of the subject property. No staining, odors, or evidence of releases were associated with these storage areas.

Utility services are provided by municipal and private entities. Potable water and sanitary sewer services are supplied by the City of Nowhere. Natural gas service availability was not confirmed during the site visit. Electrical equipment on-site consists of two pad-mounted transformers located on the northern portion of the property. These units are owned by the Energy Company and were observed to be labeled as non-PCB containing. The building is equipped with an electric passenger elevator system, which includes a hydraulic tank located on the eastern side of the structure. No leaks or staining were noted on the floor or surrounding surfaces near the hydraulic equipment. Surface water drainage is managed via a stormwater retention pond on the southern portion of the parcel. Two dumpsters are located on the southeast end of the property for solid waste disposal. No staining or significant debris was noted near the waste disposal area. Interior observations identified two floor drains within the restroom facilities; however, no floor drains or sumps were observed in the warehouse or mechanical areas. No evidence of underground storage tanks (USTs) or aboveground storage tanks (ASTs), such as vent pipes or fill ports, was identified during the inspection.

Additional interior improvements include a health club area featuring a racquetball court and a sauna.

7.2 ADJACENT PROPERTY RECONNAISSANCE FINDINGS

The surrounding area was observed from the subject property boundaries and adjacent public rights-of-way on October 3, 2025 during the site reconnaissance visit. The vicinity is characterized by a mix of recreational and residential land uses. The surrounding area was observed from the subject property boundaries and public rights-of-way. Properties to the north consist of residential dwellings. To the south, the area is occupied by residential developments. The eastern boundary is entirely vacant. To the west, the area contains a mix of residential structures and a park. No obvious conditions indicative of a release were observed on the adjacent parcels. No recognized environmental conditions were identified in connection with the surrounding area.

7.3 NON-SCOPE SERVICES

The scope of services for this assessment was primarily limited to the inquiry requirements of ASTM E1527-21. Supplemental evaluations of non-scope considerations were conducted for informational purposes to assist the User in identifying potential business environmental risks. These evaluations were limited to visual observations and a review of readily available regional data; no analytical testing or invasive sampling of building materials, air, or water was performed.

ASBESTOS CONTAINING MATERIALS

The 100,000-square-foot commercial office building was originally constructed in 1951. Due to the age of the structure, there is a potential for asbestos-containing materials (ACMs) to be present. No formal asbestos survey or bulk sampling was conducted. Under EPA NESHAP 40 CFR Part 61, a comprehensive asbestos inspection is required prior to any renovation or demolition activities that may disturb suspect materials. Materials observed at the subject property that could warrant further inspection from a certified asbestos inspector included, floor tile, popcorn ceilings, and boiler insulation, all of which were noted during the site reconnaissance visit.

LEAD-BASED PAINT

Given the 1951 construction date, lead-based paint (LBP) may be present on interior and exterior building surfaces. No sampling or X-ray fluorescence (XRF) surveys were performed. Maintenance or construction activities that disturb lead-containing paints and materials must comply with OSHA lead standards (29 CFR 1910.1025 and 1926.62). A lead inspection by a certified lead inspector can determine the presence or absence of these materials.

RADON

EPA regional data indicates the subject property is located in Radon Zone 1, where the predicted average indoor radon concentration exceeds the action level of 4.0 pCi/L. No site-specific radon testing was performed. Sampling and analysis for the presence of radon is not considered part of the scope of a Phase I ESA. It may be necessary to conduct radon sampling in the future to determine if radon mitigation is needed for the subject property. No radon detectors were noted inside of the subject property, and interviews with the maintenance staff revealed that radon had not recently been tested for.

ADDITIONAL CONSIDERATIONS

Potable water is supplied to the property by the City of Nowhere. Water quality documentation indicates that lead levels in the municipal supply are within established EPA standards. During the site reconnaissance on October 3, 2025, no visual or olfactory evidence of significant mold growth or water damage was observed in the accessible portions of the building. No evidence of significant soil erosion was noted on the 2.1-acre parcel.

8.0 FINDINGS AND CONCLUSIONS

FINDINGS

As detailed in **Section 7.1**, no RECs, CRECs, or HRECs were identified in connection with the subject property. Observations of minor chemical storage for maintenance and tenant operations were classified as de minimis conditions.

DATA GAPS

Two minor data gaps were identified during this assessment, including the lack of documented property use prior to 1895 and the unavailability of specific historical resources such as a chain-of-title report, and an environmental lien search back to 1941. As documented in the evaluation of these limitations, these gaps are considered minor and did not impede the identification of recognized environmental conditions.

CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-21 of 45433 W Main Street, Nowhere, Indiana, the subject property. This assessment has revealed no recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the subject property. No further environmental investigation is recommended at this time.

9.0 DECLARATION OF ENVIRONMENTAL PROFESSIONALS

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 C.F.R. § 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 C.F.R. Part 312. This Phase I Environmental Site Assessment (ESA) has been performed in general conformance with the scope and limitations of ASTM Practice E1527-21.

[NAME - TO BE COMPLETED BY REVIEWING EP]

[SIGNATURE - TO BE COMPLETED BY REVIEWING EP]

[DATE - TO BE COMPLETED BY REVIEWING EP]

APPENDIX A PROPERTY CARDS/MISC.

APPENDIX B USER STATEMENT/ENVIRONMENTAL QUESTIONNAIRE

APPENDIX C LOCAL AGENCY INQUIRIES SEARCH

APPENDIX D PREVIOUS ENVIRONMENTAL REPORTS

APPENDIX E RADIUS FILE SEARCH REPORT

APPENDIX F HISTORICAL SANBORN FIRE INSURANCE MAPS

APPENDIX G HISTORIC AERIAL PHOTOGRAPHS

APPENDIX H CITY DIRECTORIES

APPENDIX I SITE VISIT PHOTOGRAPHS

APPENDIX J PROFESSIONAL CREDENTIALS