

**PHASE I ENVIRONMENTAL  
SITE ASSESSMENT  
PROPOSED STERILITE CORPORATION SITE**

**HIGHWAY 72 WEST & CHARLOTTE ROAD  
CLINTON, SOUTH CAROLINA  
S&ME PROJECT NO. 1261-03-577**

Prepared For:



P. O. BOX 445  
LAURENS, SOUTH CAROLINA 29360

Prepared By:



155 Tradd Street  
Spartanburg, South Carolina

November 2003

November 17, 2003

Laurens County  
P. O. Box 445  
Laurens, South Carolina 29360

Attention: Mr. Ernest B. Segars  
Laurens County Administrator

Reference: **PHASE I ENVIRONMENTAL SITE ASSESSMENT**  
**Proposed Sterilite Corporation Site**  
Highway 72 West and Charlottes Road  
Clinton, South Carolina  
S&ME Project No. 1261-03-577

Ladies and Gentlemen:

This report presents the findings of a Phase I Environmental Site Assessment (ESA) of the referenced property. The purpose of the Phase I ESA was to assess the probability or potential of recognized environmental conditions being present or having impacted the subject property. Authorization to perform this assessment was provided by signed acceptance of S&ME Proposal No. 03664 dated October 27, 2003.

S&ME appreciates the opportunity to provide the Phase I ESA for this project. Please contact us at your convenience if there are questions regarding the information contained in this report.

Sincerely,

**S&ME, Inc.**

Michael Ulmer, P.E.  
Project Engineer

Robert Hall, P.E.  
Senior Engineer

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## 1.0 SUMMARY

S&ME, Inc. has completed a Phase I Environmental Site Assessment (ESA) of the proposed Sterilite Corporation site at Highway 72 West and Charlotte Road near Clinston, South Carolina. The purpose of this Phase I ESA is to identify recognized environmental conditions (RECs) in connection with the property to the extent feasible pursuant to the American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (E 1527-00). The ASTM Practice E 1527-00 defines "good commercial and customary practice for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products." This practice is intended to permit a user to satisfy one of the requirements to qualify for the innocent-landowner defense to CERCLA liability.

The subject property consists of approximately 265 acres of land in the north quadrant of the intersection of Highway 72 West and Charlottes Road south of Clinton, South Carolina. The property is bounded generally to the north by Byrd Drive and woodlands, to the east by the Bush River, to the south by SC Highway 72 West, and to the west by Charlottes Road. This site is identified by the Laurens County Tax Assessor's office as parcel 50 and a portion of parcel 20 on Tax Map 594 (TMS 594-00-00-050 and -020).

The majority of the property is presently open and used to pasture horses and grow hay. The rest of the property is wooded. There are a residence and several barns in the south corner of the property. The property has been an active farm since at least the early 1900s. One REC was observed on the site: an above-ground storage tank was observed in the pasture near the residence in the south portion of the site.

One facility was listed on an environmental regulatory databases within the ASTM designated search radii of the subject property. Aaron Industries, which is adjacent to the east side of the property, is listed on the RCRIS database as a small quantity generator of hazardous waste.

## 2.0 INTRODUCTION

### 2.1 PURPOSE

The purpose of this Phase I ESA was to identify, to the extent feasible following the processes described herein, recognized environmental conditions in connection with the subject property. This Phase I ESA was completed in accordance with our understanding of the guidelines set forth in ASTM Practice E 1527-00.

Practice E 1527-00 defines a REC as “the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into the structures on the property or into the ground, groundwater, or surface water of the property.” The term does not include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies.

### 2.2 SCOPE OF SERVICES

This Phase I ESA consists of the following four tasks:

Task 1 - A review of reasonably ascertainable and practically reviewable public records for the site and the immediate vicinity was conducted to characterize environmental features of the site and to identify past and present land use activities, on or in the vicinity of the site, which may indicate a potential for recognized environmental conditions. The review of the public record included:

1. Examination of public records made available to S&ME by regulatory personnel regarding past, present, and pending enforcement actions and investigations at the site and within the immediate vicinity.
2. Examination of one or more of the following resources: aerial photographs, fire insurance maps, street directories, and topographic maps of the site and vicinity for evidence suggesting past uses that might have involved hazardous substances or petroleum products.

Task 2 - A site reconnaissance was performed to identify visual signs of past or existing contamination on or adjacent to the site and to evaluate any evidence found in the review of public

record that might be indicative of activities resulting in hazardous substances or petroleum products being used or deposited on the site. The site reconnaissance included the following activities:

1. A visual reconnaissance of the site was performed to observe signs of spills, stressed vegetation, buried waste, underground or above ground storage tanks, subsidence, transformers, or unusual soil discoloration which may indicate the possible presence of contaminants on the properties. Adjacent properties were observed from the subject property.
2. The periphery of the property was viewed, and a walk-through of accessible areas of the site interior was conducted.
3. Areas of the site were photographed to document the current use(s) of the property as well as significant conditions such as unusually discolored soil, stressed vegetation, or other significant features associated with the property.

Task 3 - Interviews with appropriate local officials were conducted to consider any local knowledge of hazardous substances or petroleum products on the subject property or on adjacent properties. In addition, the current property owner was interviewed regarding his knowledge of any hazardous substances or petroleum products on the subject property or on adjacent properties.

Task 4 - The collected data were evaluated, and this report was prepared.

### **2.3 SIGNIFICANT ASSUMPTIONS**

The slope of the water table under static conditions (no pumping interference) often approximates the land surface topography in the Piedmont Geologic Province in which the subject property is located. Thus, the movement of groundwater is assumed to be in approximately the same direction as the drop of the topographic slope.

### **2.4 LIMITATIONS AND EXCEPTIONS**

The findings of this report are applicable and representative of conditions encountered at the subject property on the date of this evaluation and may not represent conditions at a later date. The review of public records was limited to that information that was available to S&ME at the time this report was prepared. Interviews with knowledgeable people and local and state government authorities were limited to those people whom S&ME was able to contact during the preparation of this report. S&ME presumes information obtained from the public records and

from interviews is reliable; however, S&ME cannot warrant or guarantee that information provided is complete or accurate. Materials and information used for this project were obtained by S&ME from reasonably-ascertainable and practically-reviewable sources in compliance with our understanding of the standards set forth by ASTM Practice E 1527-00.

## **2.5 SPECIAL TERMS, CONDITIONS, AND RELIANCE**

The resulting report is provided for the use of the client for the current real estate transaction for which it was prepared. Use and reliance on the report by any parties will be subject to the same rights, obligations, and limitations contained in our Agreement for Services Form (AS-931). However, the total liability of S&ME to all addressees of this ESA, shall be limited to the remedies and amounts as provided in the Agreement for Services Form (AS-931) as a single contract. A copy of this Agreement is included in the Appendix.

## **3.0 SITE DESCRIPTION**

### **3.1 LOCATION AND LEGAL DESCRIPTION**

The subject property consists of approximately 265 acres of land in the north quadrant of the intersection of Highway 72 West and Charlottes Road south of Clinton, South Carolina. The property is bounded generally to the north by Byrd Road and woodlands, to the east by the Bush River, to the south by SC Highway 72 West, and to the west by Charlottes Road. This site is identified by the Laurens County Tax Assessor's office as parcel 50 ( $\pm 238$  acres) and a portion of parcel 20 ( $\pm 27$  acres) on Tax Map 594 (TMS 594-00-00-050 and -020).

### **3.2 SITE AND VICINITY GENERAL CHARACTERISTICS**

The subject property and vicinity is generally rural and agricultural in nature. Outlying areas to the west, east, and south are generally wooded or in agricultural use. Outlying areas to the north become more developed as the urban area of Clinton is approached. The Highway 72 corridor to the north of the property contains retail, commercial, and light industrial development.

### **3.3 CURRENT USE OF THE PROPERTY**

The west and south portions of the subject property are open and used to pasture horses and grow hay. The east portion is wooded. There are several small ponds on the property, and the Bush River extends through and along the east side of the site. A residence with several barns is on the south corner.

### **3.4 DESCRIPTIONS OF STRUCTURES, ROADS, AND OTHER IMPROVEMENTS ON THE SITE**

There are a mobile home and several wood barns on the south corner of the property. No other structures were observed on site. There are two upland ponds in the central portion of the property, and two impounded ponds on the south side of the site. A sanitary sewer line parallels the Bush River through the east side of the property. The pasture and wooded areas are portioned by barbed-wire fencing throughout the property.

### **3.5 CURRENT USES OF THE ADJOINING PROPERTIES**

The north side of the property is bordered by a small residential development around Byrd Drive and woodlands. The east side is bordered by the Bush River. Two abandoned waste lagoons and Aaron Industries, Inc. lie on the east side of the Bush River from the property. (The lagoons and Aaron Industries are apparently not related.) Highway 72 West forms the south boundary of the site, and Charlottes Road forms the west boundary. Adjoining areas to the south and west are mostly wooded or agricultural with some residences along Charlottes Road.

## **4.0 USER PROVIDED INFORMATION**

This section is provided to summarize information provided by the user that may help in identification of RECs. As indicated in the ASTM Practice E 1527-00, the environmental professional does not typically generate this information.

### **4.1 TITLE RECORDS**

The user of this assessment did not provide ownership records for this assessment.

S&ME reviewed ownership records for the subject property at the Laurens County Register of Mesne Conveyance (RMC) Office in Laurens, South Carolina. This review indicates Parcel 50 is owned by Collie Lehn and Charlotte Lehn Strickland. The Lehns bought the property in 1991 from descendants of the John T. Young family who owned the property since at least the early 1900s. Parcel 20 is owned by Robert C. Hamer who bought the property in 1972 from Robert P. Hamer who bought the property in 1941 from Janet S. King. This list is not a certified chain of title and may not include all previous owners; however, the deeds reviewed provide no indication that the property was used for commercial or industrial purposes.

#### **4.2 ENVIRONMENTAL LIENS OR ACTIVITY AND USE LIMITATIONS**

The user did not provide deeds or information on environmental liens or use restrictions for the subject property. S&ME's review of ownership records noted no environmental liens in the deeds reviewed.

#### **4.3 SPECIALIZED KNOWLEDGE**

The user did not provide specialized knowledge of environmental or other concerns on the property.

#### **4.4 VALUATION REDUCTION FOR ENVIRONMENTAL ISSUES**

An appraisal or appraised land value was not provided; however, this assessment found no environmental issues that would affect the value of the property.

#### **4.5 OWNER, PROPERTY MANAGER AND OCCUPANT INFORMATION**

The user did not provide owner, property manager, or occupant information.

#### **4.6 REASON FOR PERFORMING PHASE I ESA**

The user did not expressly state the reason they want to have this Phase I ESA performed. S&ME assumes the purpose of this Phase I ESA is to qualify the user for the innocent landowner defense to CERCLA liability.

## **5.0 RECORDS REVIEW**

### **5.1 STANDARD ENVIRONMENTAL RECORD SOURCES**

S&ME contracted Environmental Data Resources, Inc. (EDR) to prepare a FieldCheck™ Report compiling federal and state environmental database information from the regulatory records of the United States Environmental Protection Agency (USEPA) and the South Carolina Department of Health and Environmental Control (SCDHEC). The purpose of the EDR report was to identify environmental sites and activities within a designated search radius of potential concern from the subject property as outlined by ASTM Practice E 1527-00. General descriptions of the databases including the date the information was issued and the search radius employed are provided in the EDR report in the Appendix.

The subject property is not listed on any of the databases reviewed in the EDR report. One facility was listed on an environmental regulatory databases within the ASTM designated search radii of the subject property. Aaron Industries, which is adjacent to the east side of the property, is listed on the RCRIS database as a small quantity generator of hazardous waste.

### **5.2 ADDITIONAL ENVIRONMENTAL RECORD SOURCES**

Several additional environmental databases that are not required by ASTM were searched by EDR and are referenced in the EDR FieldCheck™ Report. The subject site was not listed on these databases.

### **5.3 PHYSICAL SETTING SOURCE**

The property is on the 1983 edition of the United States Geologic Survey *Clinton, SC Quadrangle 7.5 Minute Series Topographic Map*. A USGS Topographic Map prepared with a portion of this quadrangle map is included as Figure 1. The subject property is also visible on Sheet Number 79 of the *Soil Survey of Laurens and Union Counties South Carolina* (USDA SCS, 1975).

The USGS map depicts the subject property much as it exists today. The majority of the property is open, and the west side is mostly wooded. Topography generally slopes downward from a ridge line along Charlottes Road to the west. There are ponds in draws in the central and south portions of the site, and the Bush River flows along and through the east side of the site. Two residences and two barns are shown on Charlottes Road on the southwest portion of the property. Two “Industrial Waste Ponds” are shown on the east side of the Bush River from the property.

The map in the *Soil Survey* is based on aerial photographs from 1970. It depicts the subject property as the USGS map does. The west, central, and south portions of the site are open, and the west portion and draws are wooded. Two ponds are visible on site, and the two lagoons are visible to the northeast across the Bush River. Four home sites are visible in the photograph. Three are along Charlottes Road in the southwest portion of the site, and one is located just north of the pond in the central portion of the property.

#### **5.4 HISTORICAL USE INFORMATION ON THE PROPERTY**

The historical use of the subject property was obtained by reviewing topographic maps, city directories, aerial photographs, ownership records, and by conducting interviews. Aerial photographs were reviewed at the Laurens County Offices in Laurens, South Carolina, and telephone cross-reference directories were reviewed at the Laurens County Library in Laurens.

Aerial photographs dated 1995, 1980, and 1964 show the subject site generally as it exists today. The west, central, and south portions of the property are open. The west portions and along the draws are wooded. A small area adjacent to Charlottes Road is also wooded. In the 1995 photograph, there is one residence with several barns in the south corner of the property. In the 1980 photograph, there are two residences on Charlottes Road in the south portion of the property, and in the 1964 photograph, there is a third residence on Charlottes Road and a fourth just north of the pond in the central portion of the site. All of the photographs show the lagoons to the northeast of the Bush River. In 1995, they are overgrown. However, in the 1985 and

1964 photographs, they appear to be active. The Aaron Industries facility adjacent to the east corner of the property on Highway 72 West is visible in only the 1995 photograph. Aerial photographs prior to 1964 were not readily available.

The 2003 *Laurens County South Carolina Polk City Directory* lists a private residence at 2443 Charlottes Road which is the subject site. There are several other listings for residences on the opposite side of Charlottes Road from the property. Aaron Industries, Inc. is listed at 1784 Highway 72 West. Prior to 1998, the area of the subject property including Highway 72 West and Charlottes Road are listed by rural routes. As such, listings cannot be accurately located.

## **5.5 HISTORICAL USE INFORMATION ON ADJOINING PROPERTIES**

All of the historical use information indicates the subject property has been used for pasturing horses and/or cattle or other agricultural purposes since at least the early 1960s. Adjoining areas have also been either undeveloped woodlands or agricultural in use during that time. The lagoons to the northeast of the Bush River have been there since at least 1964, and Aaron Industries was constructed in about 1986.

## **6.0 SITE RECONNAISSANCE**

The site reconnaissance was conducted to observe the current uses of the property, adjoining properties, and properties in the surrounding area, as well as the geologic, hydrogeologic, hydraulic, and topographic conditions of the property and the surrounding area. Interviews with owners and occupants present on the property were conducted to obtain information regarding RECs. Photographs were taken of various portions of the subject site to document existing conditions. Copies of these photographs are included in the Appendix.

### **6.1 METHODOLOGY AND LIMITING CONDITIONS**

The subject property was observed by walking accessible areas of the property. Adjacent properties were observed from the subject property and by driving accessible roads in the area.

## **6.2 GENERAL SITE SETTING**

### **6.2.1 Current Use(s) of the Property**

The property is currently used for residential purposes, to pasture horses, and to grow hay.

### **6.2.2 Past Use(s) of the Property**

The subject property was used for residential and agricultural purposes from the early 1900s.

### **6.2.3 Current Uses of Adjoining and Surrounding Properties**

Adjoining properties to the north contain residential development and woodlands. Adjoining properties to the east contain abandoned waste water lagoons and light industrial development. The lagoons and industrial development are not related. Adjoining properties to the south and west are residential or undeveloped.

### **6.2.4 Past Uses of Adjoining and Surrounding Properties**

Past uses of adjoining properties have mostly been residential and agricultural. The Highway 72 West corridor to the north of the subject site has slowly redeveloped from rural, low-density residential and agricultural uses to mostly service and commercial uses over the past 10 to 20 years.

### **6.2.5 Geologic, Hydrogeologic, Hydrologic, and Topographic Conditions**

Laurens County is in the Piedmont Geologic Province. The Piedmont Physiologic Province is a relatively broad strip extending from central Alabama across Georgia and the Carolinas into Virginia. Rocks of the Piedmont occur in belts that are some of the oldest formations in the United States. The rock types are primarily metamorphic gneiss and schist with some granite intrusions.

The major portion of the bedrock in the Piedmont is covered with a varying thickness of residual soil that has been derived by chemical decomposition and physical weathering of the underlying rock. Residual soils developed during the weathering of this bedrock, consist predominately of

micaceous sandy silts and silty sands which grade to clayey silts with nearness to the ground surface. The thickness of the residual soils can vary from only a few feet to in excess of 100 feet.

The boundary between the residual soil and the underlying bedrock is not sharply defined. Generally, a transition zone consisting of very hard soil to soft rock, appropriately classified as "partially weathered rock", is found. Within the transition zone, large boulders or lenses of relatively "fresh" rock that are generally much harder than the surrounding material often exist. The irregular bedrock surface is basically a consequence of differential weathering of the various minerals and joint patterns of the rock mass.

The soils on the subject property are mapped predominantly as Cecil and Appling soils. The soils in the floodplain along the Bush River are mapped as Cartecay-Toccoa complex. According to the *Soil Survey*, the depth to bedrock in the Cecil and Appling soils is typically more than five feet, the depth to groundwater is typically greater than six feet, and the Hydrologic Soils Group is B. The slope of the water table under static conditions (no pumping interference) often approximates the land surface topography in the Piedmont Geologic Province. Thus, the movement of groundwater is assumed to be in approximately the same direction as the drop of the topographic slope which is generally to the east.

Based on data from the *Soil Survey*, Laurens County receives an average of 47.2 inches of precipitation per year. Precipitation is relatively evenly spread throughout the year. The 10-year 24-hour rainfall (TP-40) for Laurens County is 5.5 inches.

#### **6.2.6 General Description of Roads and Structures**

There are a residence and two large barns on the south corner of the property. The residence is a mobile home. The barns are wood frame structures with dirt floors. There are no roads on the property.

### **6.2.7 Potable Water Supply and Sewage Disposal System**

Municipal water and sanitary sewer are available in the area of the subject property. Based on the age of the former residences on the site, it is probable that groundwater wells, privies, and/or septic tanks are present on the property. Residential septic systems are typically not considered environmental concerns.

### **6.3 EXTERIOR OBSERVATIONS**

The subject property comprises approximately 265 acres of mostly undeveloped land. The majority of the north, central, and south portions of the property are open pasture. The east side of the site and a draw in the south portion are wooded with pine and hardwood trees and light to thick underbrush. There are two upland ponds in the draw in the central portion of the property, and two impounded ponds on the stream in the draw on the south side of the site. Both draws drain to the Bush River which runs along and through the east side of the property. A sanitary sewer line parallels the Bush River through the east side of the property. The pasture and wooded areas are portioned by barbed-wire fencing throughout the property.

Remnants of a house and a well were observed in the woods just north of the central pond. Dumping was also observed throughout the edge of the woods. The dumped materials include household refuse including glass, tin cans, plastic, and an old appliance. This opportunistic dumping does not appear to be indicative of systematic dumping, and no obviously hazardous materials or petroleum products were observed. Therefore, the dumping appears to be a *de minimis* environmental condition. A second well was observed on the southwest side of the site near an old home site.

An above-ground storage tank (AST) with a hand pump and hose was observed in the pasture on the south side of the site. The tank was approximately half full, but the content was not sampled. No significant staining was observed around the tank; however, some staining was observed directly below the tank.

Overhead power lines are present along Charlottes Road and Highway 72 West, and numerous underground utilities are present along both roads. Pole-mounted electrical transformers were observed on the east side of the site. The transformers appear to be relatively new, and no signs of leaking were noted.

#### **6.4 INTERIOR OBSERVATIONS**

There are a residence and two large barns on the south corner of the property. The residence is a mobile home that is currently occupied. It was not entered. The barns are wood frame structures with dirt floors. One barn is used to store a tractor and a lawn mower. Several containers of lubricant, anti-freeze, and other chemicals were observed on the barn floor; however, no significant staining was observed. There are several other small pens and sheds around the barns and residence.

### **7.0 INTERVIEWS**

Interviews were conducted to obtain information from individuals who have knowledge of current and past activities at the site.

#### **7.1 INTERVIEW WITH OWNER**

S&ME talked with Mr. Collie Lehn (864-984-6531), the current owner of the property. Mr. Lehn stated that his family bought the farm in 1991 and that it has been used to raise cattle or pasture horses for the last 50 years. He stated that the previous owner, the Young family, had owned the property since the late 1800s, and he speculated that the farm probably was used for cotton production during the first half of the 20<sup>th</sup> century. Mr. Lehn stated that the current mobile home residence was placed on site when they bought the land in 1991. There were no houses on the property at that time. He knew of no environmental concerns on the property.

#### **7.2 INTERVIEW WITH KEY SITE MANAGER**

See Section 7.1 above.

#### **7.3 INTERVIEW WITH OCCUPANT**

See Section 7.1 above. The current occupant of the residence was not interviewed.

#### **7.4 INTERVIEW WITH LOCAL GOVERNMENT OFFICIALS**

S&ME contacted the Laurens County Fire Department (864-833-7520) to request that they review their files to determine if there have been spills, leaks, or releases of hazardous substances at the subject or adjacent properties. S&ME talked with Mr. Larry Hall, the County Fire Coordinator, who said that the property is used to pasture horses and that he knew of no hazardous material responses, fires, or other environmental concerns on the property.

S&ME also contacted Mr. Ralph Lewis, the Director of Public Works for the City of Clinton (864-833-7520) and Mr. Sam Bennett, the City Manager (864-833-7505). We asked about the waste lagoons to the north of the property. Mr. Lewis and Mr. Bennett stated that these lagoons are the former sanitary sewer waste lagoons operated by the City of Clinton. They said they were abandoned when the Joanna waste-water treatment plant was constructed around 1989.

#### **7.5 INTERVIEWS WITH OTHERS**

S&ME called Mr. Mike Johnson with Aaron Industries, Inc. (864-833-2067). Mr. Johnson is the plant manager for the facility adjacent to the subject property. Mr. Johnson stated that the plant was built about 1987, and they produce food grade chemicals for the pharmaceuticals and other uses. Mr. Johnson said the plant uses and produces no hazardous materials.

#### **7.6 REVIEW OF SUBSURFACE EXPLORATION**

S&ME reviewed the Subsurface Exploration report prepared for the subject property concurrently with this Phase I ESA. Fifty-four soil test borings were performed to depths from 15 to 100 feet below the existing ground surface for geotechnical purposes. Generally, the borings encountered a surface layer of organic laden topsoil underlain by natural residual soils. No indications of fill, buried debris, or other environmental concerns were noted in the borings.

### **8.0 FINDINGS**

**On-site Findings:** The following findings of an environmental nature were identified on site during the Phase I ESA:

1. Dumping was observed within the woods throughout the property.
2. An above-ground storage tank was observed in the pasture in the south portion of the site.

**Off-site Findings:** Offsite findings of an environmental nature were identified during the Phase I ESA for the subject site.

1. One facility was listed on environmental regulatory databases within the ASTM designated search radii of the subject property. The Aaron Industries facility at 1784 Highway 72 West is listed on the RCRIS database as a small quantity generator of hazardous waste.
2. Historical information indicates two “Industrial Waste Ponds” adjacent to the northeast side of the property.

## 9.0 OPINION

**Onsite Finding:** S&ME offers the following opinions concerning on-site findings of potential environmental concern.

1. The dumping, although wide spread, does not appear to be systematic, and no obviously hazardous materials were observed in these areas. It is S&ME’s opinion that this dumping is a *de minimis* condition and is not considered a REC.
2. The AST is about half full. No significant staining was observed around the tank; however, some staining was observed directly below the tank. This AST is a REC.

**Offsite Findings:** S&ME offers the following opinion concerning the off-site finding of potential environmental concern.

1. The plant manager for the Aaron Industries facility stated that the plant produces no hazardous materials and does not know why the facility is listed on the RCRIS database.

There were no permit or other violations indicated in the EDR report. It is S&ME's opinion this facility is not a REC.

2. The "Industrial Waste Ponds" are the former City of Clinton sanitary sewer treatment lagoons. They were abandoned about 1989 when the Joanna WWTP was constructed. They have been allowed to re-vegetate since that time. It is S&ME's opinion these lagoons are not a REC.

## **10.0 CONCLUSIONS**

S&ME has performed a Phase I Environmental Site Assessment in conformance with our understanding of the scope and limitations of ASTM Practice E 1527-00 of the proposed Southside High School site on Jacobs Road in Greenville, South Carolina. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. This assessment has revealed no evidence of RECs in connection with the subject property except for the following:

1. An above-ground storage tank was observed in the pasture on the south portion of the site. Staining below the tank indicates there has been a release from the tank.

## **11.0 REFERENCES**

Published references used for this assessment are noted in the Section of the report in which they appear.

## **12.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS**

Signatures are on the cover letter of this report.

## **13.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS**

The environmental professionals for this project are Mr. Michael Ulmer, P.E. and Mr. Robert Hall, P.E. Mr. Ulmer conducted the assessment and prepared the report. He holds a BS and MS in Civil Engineering from Clemson University and a BA from Furman University. He is a registered professional engineer with 10 years consulting experience. Mr. Ulmer has performed numerous environmental assessments for real estate transactions.

Mr. Hall has over 25 years of consulting experience and provided senior review for the project. He holds a BSCE from Clemson University and is a registered professional engineer in several states. He has managed and provided senior review for numerous environmental assessments for real estate transactions.