



LAW

ENGINEERING AND ENVIRONMENTAL SERVICES, INC.

**REPORT OF
PHASE I ENVIRONMENTAL
SITE ASSESSMENT**

**Woodfield
International Boulevard
Fountain Inn, South Carolina**

Prepared For:

**LIBERTY PROPERTY TRUST
Malvern, Pennsylvania**

Prepared By:

**LAW ENGINEERING AND ENVIRONMENTAL SERVICES, INC.
Four Interchange Boulevard
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December 18, 1996

LAW Project 20320-6-1374, Phase 05

EXECUTIVE SUMMARY
Woodfield
International Boulevard
Fountain Inn, South Carolina

Law Engineering and Environmental Services, Inc. (LAW) has performed a Phase I Environmental Site Assessment (PESA) of a property located on Interstate Highway 385, near Fountain Inn, Laurens County, South Carolina. Specifically, the subject site is known as the Woodfield development (Woodfield). Woodfield consists of an approximate 250 acre parcel of vacant property. A separate PESA report has been prepared for the Woodfield Spec Building located in Woodfield.

LAW has reviewed environmental regulatory lists, related historical and geological information and information obtained during our site and surrounding area reconnaissance. LAW's Phase I Environmental Site Assessment has not identified evidence of recognized environmental conditions at the subject site related to:

- Neighboring Site Reconnaissance - Our neighboring site reconnaissance did not identify off-site activities considered potential sources of recognized environmental conditions at the subject site, other than facilities identified in the regulatory review.
- Site Reconnaissance - Our site reconnaissance did not identify on-site activities that are expected to have adversely impacted the subject site.
- Site History - Our site history review indicated that prior to the present use, the site was farmland and wooded.
- Surrounding Property History - Our surrounding property history review indicated that prior to the present commercial development, the surrounding area was farmland and residential.

LAW's Phase I Environmental Site Assessment has identified evidence of potential recognized environmental conditions at the subject site related to:

- Regulatory Review - Our review of federal, state, and local regulatory information identified the adjacent Allibert, Nicca, and Van Dorn Demag facilities as a Resource Conservation and Recovery Act (RCRA) Generators of hazardous waste. These facilities are upgradient such that contamination could potentially affect the subject site. However, we have not found any information indicating that releases have occurred. The Allibert, Nicca, and Van Dorn Demag facilities represent a low degree of environmental concern to the subject site.

Pratt Coatings & Chemical is located north of Interstate Highway 385, upgradient of the subject site, and is reported to operate an underground storage tank. Leakage or spillage of materials from this UST were not reported in the regulatory databases reviewed. The Pratt Coatings & Chemical facility represents a low degree of environmental concern to the subject site.

The adjacent Nicca facility was also identified as a Resource Conservation and Recovery Act (RCRA) Large Quantity Generator of hazardous waste. The Nicca facility is situated upstream and along a small tributary which forms the southern border of the site, such that contamination entering the stream from the Nicca facility could potentially affect the subject site. Nicca is listed on the Emergency Response Notification System (ERNS) list, dated July, 1996, as having had a spill of 500 gallons of sulfuric acid in July, 1989. Our review of the RMT report "Environmental Assessment of Laurens County Site" dated July, 1990, and provided to LAW by Liberty Properties indicated the presence of ground-water contamination at the Nicca facility. LAW recommends a review of files located at the Greenville, SC office of the South Carolina Department of Health and Environmental Control (SCDHEC) related to the reported ground-water contamination at the Nicca facility.

Because this site is vacant of structures, neither a building condition survey nor an asbestos survey were conducted. Additionally, no samples were collected for radon, lead-in-water nor lead-in-paint.

1.0 INTRODUCTION

Law Engineering and Environmental Services, Inc. (LAW) has performed a Phase I Environmental Site Assessment (PESA) of a property located on Interstate Highway 385, near Fountain Inn, Laurens County, South Carolina. Specifically, the subject site is known as the Woodfield development (Woodfield). Woodfield consists of an approximate 250 acre parcel of vacant property. A separate PESA report has been prepared for the Woodfield Spec Building located in Woodfield.

This report has been prepared on behalf of and for use by Liberty Property Trust and their affiliates. No other party has a right to rely on the contents of this report without the express written authorization of LAW.

Mr. Michael Hagan of Liberty Property Trust requested that LAW perform this assessment in accordance with LAW Proposal No. PAW-4-11324 dated August 11, 1994. It is our understanding that Liberty Property Trust is considering purchasing the subject site from Liberties Properties Group, the present site owner.

2.0 PURPOSE, SCOPE AND REPORT FORMAT

2.1 PURPOSE

The purpose of our Phase I Environmental Site Assessment was to characterize the general site and adjacent property conditions relative to environmental concerns and to identify obvious actual and potential environmental concerns. It was not the purpose of this study to determine the actual presence, degree, or extent of contamination, if any, on the subject site. Additional exploratory work, including sampling and laboratory analysis, was not part of this assessment.

2.2 SCOPE OF WORK

The Phase I Environmental Site Assessment is a general characterization of environmental concerns based on readily available information and site observations. The following assessment services were provided:

1. A review of the site's location, present use and improvements, topography, soils, geology, and hydrogeology.
2. A review of site history information, including aerial photographs, maps, and other readily available site development data.
3. A review of select available regulatory information published by state and federal agencies, health and/or environmental agencies. A listing of facilities in federal and state databases within the site area was obtained from Datasite Services.
4. A neighboring site reconnaissance, including a review of adjacent property uses as well as significant area property uses.
5. A site reconnaissance and environmental review, including a site survey, and inspections for chemicals and raw materials, polychlorinated biphenyls (PCBs), wells, hazardous and solid wastes, on-site landfills, pits and sumps, storage tanks, and utilities.
6. A visual asbestos survey for potentially asbestos-containing building materials. Since the building was constructed in 1990, no samples were collected or analyzed.
7. Collection of drinking water samples for lead analysis.
8. Preparation of this report containing our conclusions and recommendations.

Since the building has no basement, no radon testing was conducted. Since there are no daycare facilities at the site, no lead paint sampling was conducted.

2.3 REPORT FORMAT

Our report format contains six major assessment sections:

- Site Location and Geology
- Site History
- Regulatory Review
- Neighboring Site Reconnaissance
- Site Reconnaissance and Environmental Review

Recommendations based on the five sections are included in an evaluation section:

- Conclusions and Recommendations

A statement of interpretive limitations follows the recommendations.

3.0 SITE LOCATION AND GEOLOGY

3.1 SITE LOCATION

The subject site is located southeast of the intersection of Interstate Highway 385 and the border between Greenville County and Laurens County, near Fountain Inn, Laurens County, South Carolina. The site consists of the vacant property in the Woodfield development. Portions of the site are wooded, with approximately 40 percent covered with grasses and weeds. The surrounding area is developed with industrial facilities, farmland and residential developments.

3.2 SITE GEOLOGY/HYDROGEOLOGY

A consideration of surface and subsurface drainage and geology are of interest since they provide an indication of the direction that contaminants, if present, could be transported.

LAW reviewed the following information regarding the hydrogeology of the subject site and surrounding area:

- *Geological Map of Crystalline Rocks of South Carolina*, United States Geological Survey (USGS) Miscellaneous Investigations Map I-413, 1965.
- *Fountain Inn, South Carolina* quadrangle, USGS map, 7.5 minute series, dated 1983 (Figure 1).

- *The Geology of the Carolinas*, Carolina Geological Society, 1991.

The site is located within the Piedmont Physiographic Province. Based on published literature, the site is underlain at depth by bedrock consisting of gneiss and schist. The bedrock is generally overlain by a mantle of residual soil formed by the in-place weathering of the bedrock. During our site walkover, bedrock outcrops were not observed.

Based on a review of the topographic map, the site is located on moderately sloping terrain. The surface elevation at the site ranges from approximately 740 to 820 feet above mean sea level (msl). Site grades generally slope to the west, with the exception of a small portion located west of Stoddard Creek, which slopes to the east. Three tributaries of Stoddard Creek are located on the subject site. These tributaries flow to the west. A small pond was also observed on the southern portion of the subject site. Surface water run-off from the subject site would be expected to generally flow towards Stoddard Creek (Figure 2).

In this geologic setting, ground water generally occurs under water table conditions as a result of infiltration of surface water through the overlying materials. The shape of the water-table (shallow) aquifer is usually a subdued reflection of the surface topography, with shallow ground water generally flowing toward the nearest stream or drainage-way. Based on the area topography, ground-water flow at the subject site is generally expected to flow west towards Stoddard Creek.

4.0 SITE HISTORY

4.1 PAST SITE USES

LAW reviewed the following available information in order to ascertain the historical uses of the subject site and adjacent properties to evaluate the presence of activity of potential environmental concern:

- Aerial photograph, dated 1980, from the Laurens County Tax Office.
- Aerial photographs dated 1968 and 1989 from the Greenville County Planning Commission.

- USGS map, *Fountain Inn, South Carolina* quadrangle, 7.5 minute series, dated 1983.

A chain-of-ownership was not provided to LAW for review as part of this assessment. Historical city directories and Sanborn maps were not available for the subject site. Our review of the USGS map generally corresponded with our aerial photograph review.

The subject site appears to be undeveloped farmland or pasture prior to the development of Woodfield. In the 1989 aerial photograph, the subject site appears essentially as observed at the time of our area reconnaissance. Based on our review of property cards listing present and previous owners, it appears that the properties which were combined to create Southchase were owned by individuals prior to purchase by Liberty Life Insurance Company, Inc. in 1986.

4.2 PAST IMMEDIATELY SURROUNDING LAND USES

The surrounding properties to the north and west appear to be residential, and relatively unchanged, in the 1968 through 1980 aerial photographs. The surrounding properties to the east and south appear to be farmland/pastureland in the 1968 through 1989 aerial photographs.

Properties to the west of the subject site appear to be partially industrial and partially undeveloped. The adjacent Nicca facility appears in the 1989 aerial photograph.

4.3 DOCUMENT REVIEW

LAW was provided with a previous report entitled *Environmental Assessment of Laurens County Site*, prepared by RMT, Inc. (RMT) for Liberty Properties Group, Inc. and dated July 1990. The stated purpose of the report was to "...provide information related to possible environmental liabilities that may be associated with the Laurens County site." The report did not identify any evidence of potentially significant environmental concerns at the subject site. Surface water and sediment samples from the on-site tributaries of Stoddard Creek were collected and analyzed for priority pollutant metals and volatile organic compounds (VOCs). RMT reported that no VOCs were detected and that the concentrations of metals detected "...do not appear to constitute a significant deviation from the range of anticipated background levels of (the detected) metals."

A geophysical survey of the subject site was also performed by RMT. RMT reported "The geophysical survey showed somewhat elevated conductivity readings near the three streams that enter the property from off-site." RMT also stated "In summary, evidence revealed by this study (conducted by RMT) did not suggest significant environmental impairment of the subject property."

4.4 OIL AND GAS ACTIVITY

No oil or gas transmission lines were observed in the vicinity of the subject site.

5.0 REGULATORY REVIEW

5.1 LOCAL

LAW interviewed Mr. Charles Bristow of the South Carolina Department of Health and Environmental Control (SCDHEC) - Greenville office, concerning hazardous materials incidents or reported ground-water contamination in the area of the subject site. Mr. Bristow indicated that he was not aware of significant environmental concerns at the site or in the surrounding area.

5.2 STATE AND FEDERAL

LAW conducted a review of regulatory lists and permitted landfills published by state and federal regulatory agencies to determine whether the subject site or nearby properties are listed as having a past or present record of actual or potential environmental impact or are under investigation for an environmental impact. Regulatory information was provided to LAW by Datasite Services. A copy of the Datasite report is provided as Appendix C. Listed facilities identified within the search radius of the subject site are discussed below.

Regulatory listings are limited and include only those sites which are known to regulatory agencies to be contaminated at the time of publication, to be in the process of evaluation, to be subject to monitoring for potential contamination, or to be otherwise regulated.

EPA NATIONAL PRIORITIES LIST (NPL), dated August 15, 1996

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) established the National Priorities List (NPL) of federal "Superfund" sites. These are contaminated sites that have been assigned a high ranking, in terms of potential public health effects, by the Environmental Protection Agency (EPA) and require remediation.

- The subject site does not appear on the NPL list.
- There are no facilities listed on the NPL within one mile of the subject site.

STATE PRIORITY SITE LIST, dated September 19, 1996

The SCDHEC Bureau of Solid and Hazardous Waste maintains an inventory of state priority contaminated sites identified as the Hazardous Waste Site State Equivalent of National Priority List (HWS) list.

- The subject site does not appear on the SCDHEC HWS.
- There are no facilities listed on the SCDHEC HWS list within one mile of the subject site.

EPA COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION AND LIABILITY INFORMATION SYSTEM (CERCLIS) LIST, dated August 15, 1996

The CERCLIS list identifies suspected contamination sites throughout the nation; however, a facility or site on this list does not necessarily have environmental problems.

- The subject site does not appear on the CERCLIS list.
- There are no facilities listed on the CERCLIS list within one-half mile of the subject site.

EPA RESOURCE CONSERVATION & RECOVERY INFORMATION SYSTEM (RCRIS),
dated October 21, 1996

RCRIS, or RCRA Notifiers list, is the EPA database of facilities that generate, transport, treat, store, or dispose of hazardous waste.

- The subject site does not appear on the RCRIS list.
- There are three facilities listed on the RCRIS generators list adjacent to Woodfield.
- There are no facilities listed on the RCRIS treatment, storage, and disposal (TSD) list within one mile of the subject site.

The facilities are summarized as follows

| FACILITY | ADDRESS | LOCATION | GENERATOR LEVEL | VIOLATIONS | GRADIENT |
|----------------------|------------------------|--------------------|-----------------|------------|------------|
| Allibert Inoac, Inc. | 101 International Blvd | adjacent north | LQG | No | Upgradient |
| Nicca USA, Inc. | 5000 Nelson Road | adjacent northeast | LQG | No | Upgradient |
| Van Dorn Demag, Inc. | 235 S. Woods Drive | adjacent north | CESQG | No | Upgradient |

CESQG - Conditionally Exempt Small Quantity Generator

SQG - Small Quantity Generator

LQG - Large Quantity Generator

The three aforementioned facilities are upgradient of the subject site, and could potentially affect the subject site in the event of a release. However, we have found no evidence of RCRA violations at the three sites.

STATE REGISTERED STORAGE TANK (RST) LIST, dated October 30, 1996

This list identifies registered storage tanks on or in the vicinity of the subject property and indicates the age, capacity, size, and contents of the RST.

- The subject site does not appear on the RST list.
- Pratt Coating and Chemicals, located north of the subject site, was listed as having a registered underground storage tank. This facility did not appear on the leaking UST list.

STATE LEAKING UNDERGROUND STORAGE TANK (LUST) LIST, dated September 24, 1996

The LUST list identifies properties which have been reported to the state as having known leakage from tanks.

- The subject site does not appear on the LUST list.
- There are no facilities listed on the LUST list within one-half mile of the subject site.

EPA EMERGENCY RESPONSE NOTIFICATION SYSTEM (ERNS) LIST, dated July 11, 1996

The ERNS list is a national database used to collect information on reported releases of oil and hazardous substances.

- The subject site does not appear on the ERNS list.

STATE LANDFILLS LIST, dated July 10, 1996

A list of permitted solid waste landfills is maintained by South Carolina. This landfill listing does not include unpermitted landfills or dumps.

- The subject site does not appear on the Landfills list.
- There are no facilities listed on the Landfills list within one-half mile of the subject site.

6.0 NEIGHBORING SITE RECONNAISSANCE

The neighboring site reconnaissance was performed on December 5, 1996 by LAW professional Mr. Ken Voyles to assist in evaluating whether adjacent land uses have or could contaminate the subject

site. The neighboring site reconnaissance was conducted by touring the area by automobile, and viewing particular businesses from public rights-of-way.

The properties surrounding the subject site consist of undeveloped land, commercial buildings, industrial facilities and single family residences. The findings of our neighboring site reconnaissance are discussed below according to the geographic relation to the subject site.

6.1 NORTH

The subject site is bounded to the north by Frontage Road and Interstate Highway 385. Across Interstate Highway 385 lie several commercial and light industrial properties. Residential areas are located further north of the commercial areas.

Environmental concerns were not noted north of the subject site.

6.2 SOUTH

The subject site is bounded to the south by wooded property and farmland.

Environmental concerns were not noted southeast of the subject site.

6.3 WEST

The subject site is bounded to the west by farmland and wooded property.

Environmental concerns were not noted west of the subject site.

6.4 EAST

The site is bounded to the east by industrial areas and undeveloped property. Nicca, Allibert, Lacs and Teknor Apex are located east and northeast of the subject site.

Nicca and Allibert were listed on the RCRA list as Large Quantity Generators of hazardous a waste.

7.0 SITE RECONNAISSANCE AND ENVIRONMENTAL REVIEW

Mr. Ken Voyles of LAW conducted the site reconnaissance on December 4 and 5, 1996. The site reconnaissance was conducted on foot.

7.1 GENERAL SITE EVALUATION

The subject site consists of approximately 250 acres situated within Woodfield. Portions of the site are wooded, with approximately 30 percent covered with grasses and weeds. The surrounding area is developed with industrial facilities, farmland and residential developments. With the exception of the potential for wetlands in the area of the pond and other on-site surface waters, no recognized environmental conditions were observed.

What appeared top be a former homesite was observed on the northeast portion of the site. Several old appliances, piles of food cans and other domestic items were noted. Additionally, an apparent bored well was also observed in this area.

Near the central portion of the site, a small area where dumping had occurred was observed. The discarded items consisted of chairs, mattresses and other domestic items. An empty 55-gallon drum partially filled with household waste was observed. No odors or stained soils were observed.

7.2 INTERVIEWS CONDUCTED

Mr. William Camp of Liberty Properties was interviewed concerning the subject site. The information obtained is reflected in the following sections.

7.3 CHEMICALS AND RAW MATERIALS

No chemicals were observed at the subject site.

7.4 PCB ELECTRICAL TRANSFORMERS

Electrical transformers are a potential source of environmental concern due to the possible presence of polychlorinated biphenyl (PCB) containing cooling oils used in some units.

One transformer was observed on the subject property, near the Woodfield Spec Building. No indications of damage or leakage was observed.

7.5 ASBESTOS-CONTAINING MATERIAL (ACM)

As the subject site is vacant of structures, an asbestos survey was not performed.

7.6 RADON

As the subject site is vacant of structures, a radon survey was not performed.

7.7 LEAD IN PAINT AND WATER

As the subject site is vacant of structures, a lead-in-paint survey was not performed.

7.8 DRINKING-WATER WELLS

An apparent bored well was observed in the northwest corner of the property. The well appeared to have not been used for some time.

7.9 HAZARDOUS AND SOLID WASTES

No hazardous wastes are currently generated at the subject site.

7.10 ON-SITE LANDFILLS

From our review of the State Landfill list, aerial photographs and observations during our site reconnaissance, no on-site landfills were identified, with the exception of the apparent one-time on-site dumping of domestic waste.

7.11 PITS AND SUMPS

No on-site pits or sumps were observed during the site reconnaissance.

7.12 STORAGE TANKS

No evidence of underground or aboveground storage tanks was observed during the site reconnaissance.

7.13 WASTEWATER STREAMS AND UTILITIES

As the subject site is vacant of structures, no wastewater streams or utility connections were observed. Electric power in the area is provided by Duke Power Company. Natural gas service is provided by Piedmont Natural Gas. Sanitary wastewater handling is provided by the Western Carolina Regional Sewer Authority.

7.14 DRINKING WATER

Drinking water service is provided by the Greenville Water System.

8.0 CONCLUSIONS AND RECOMMENDATIONS

LAW has reviewed environmental regulatory lists, related historical and geological information and information obtained during our site and surrounding area reconnaissance. LAW's Phase I Environmental Site Assessment has not identified evidence of recognized environmental conditions at the subject site related to:

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LAW recommends a review of files located at the Greenville, SC office of the South Carolina Department of Health and Environmental Control (SCDHEC) related to the reported ground-water contamination at the Nicca facility.

Because this site is vacant of structures, neither a building condition survey nor an asbestos survey were conducted. Additionally, no samples were collected for radon, lead-in-water nor lead-in-paint.

9.0 LIMITATIONS

The findings and opinions are relevant to the dates of our site work and should not be relied on to represent conditions at substantially later dates.

The opinions included herein are based on information obtained during the study and on our experience under similar circumstances. If additional information becomes available which might impact our environmental conclusions, we request the opportunity to review the information, reassess the potential concerns, and modify our opinion, if warranted. This assessment included a review of reports prepared by other consultants. It must be recognized that LAW has no responsibility for the accuracy of information contained therein.

Although this assessment has attempted to identify the potential for contamination of the subject property, potential sources of contamination may have escaped detection due to: (1) the limited scope of this assessment, (2) the inaccuracy of public records, and (3) the presence of undetected and unreported environmental accidents.