



ASTM 1527-05 Phase 1
Environmental Site Assessments

MKA Zoning

**123 Main Street
Elizabeth, KY**

Site Reference: Vacant Land

MKA Project #: 5957-15-2227

Report Completion Date: August 24, 2015

Prepared For: Sample Client, Inc.

**PHASE I ENVIRONMENTAL
SITE ASSESSMENT REPORT
Vacant Land
122 Heartland Drive
Elizabethtown, Kentucky**

MKA Project No. 5957-11-2227

August 29, 2011

Prepared for:

**Mr. Rick Byrd
HealthSouth Corporation
3660 Grandview Parkway, Ste. 200
Birmingham, AL 35243**

Provided by:



6593 Commerce Court
Warrenton, Virginia 20187
Phone: (540) 428-3550
Fax: (540) 428-3560
www.mkassociates.com

Performed by:



Environmental Sciences & Inspection Services

A handwritten signature in black ink, appearing to read 'Anne S. Childress', is written over a light blue horizontal line.

**Anne S. Childress
Project Engineer**

EXECUTIVE SUMMARY

MKAssociates, Inc. (MKA) in association with DMG, Inc. (DMG) was authorized by C. Richard Byrd III to conduct a Phase I Environmental Site Assessment (ESA) of the Property located at 122 Heartland Drive, Elizabethtown, Kentucky 42701 ("the Site").

DMG has conducted this ESA in general accordance with the scope and limitations of ASTM Designation E 1527-2005, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (AAI) in 40 CFR Part 312. There are no exceptions to, or deletions from the ASTM 1527-2005 AAI standard practice and authorized Scope of Services.

This Executive Summary summarizes the key findings of this assessment based on information and data available to DMG during the performance of this project. The Executive Summary also presents Conclusions and Recommendations, which are based on the conditions existing at the time of the assessment. This summary does not contain all the information that is found in the full report. Detailed information regarding these findings is provided in the corresponding section of the text of the report. The report should be read in its entirety to obtain a more complete understanding of the information provided.

Findings and Conclusions

The following table summarizes the findings of the significant elements of this investigation.

ASSESSMENT COMPONENT	ACCEPTABLE	ROUTINE SOLUTION	PHASE II	ESTIMATED COST	REFERENCE SECTION
Historical Review	X				3.0
On-Site Operations	X				4.2
Surface Areas	X				4.3
Hazardous Materials	X				4.5
Waste Generation	X				4.6
PCBs	X				4.7
Storage Tanks	X				4.8
Asbestos	X				4.9
Lead-Based Paint	X				4.10
Radon	X				4.11
Mold	X				4.12
Dry Cleaners	X				4.13
Unidentified Site Concerns	X				4.14
Surrounding Properties	X				4.15
Regulatory Database Review	(1)				5.0

- (1) Two adjacent sites are listed on the UST list (HealthSouth Rehabilitation Hospital and SuperAmerica) as having USTs and the SuperAmerica is listed on the FINDS and RCRA Non Generator List. There is no information in the database listing indicating that there have been releases from these properties to the subject property. Site reconnaissance indicated that the tanks are not directly contiguous to the subject property.

The Site consists of a vacant parcel of land located on the west side of Heartland Drive. There are no improvements on the property.

Based upon evidence obtained by DMG from available aerial photographs, Sanborn maps, historic street directories, county records, interviews, and the Users Questionnaire, the Site appeared to be vacant/agricultural land from as early as 1938 and through the current day. There are no Sanborn maps available for the property and city directory search by EDR indicated no listings for the site. Overall, historic uses of the Site appear to have had low potential for current impact to the Site subsurface.

Based upon evidence obtained by DMG from available aerial photographs, Sanborn maps, historic street directories, and the inspection of the surrounding properties, the adjacent property to the north was depicted as a hospital/rehabilitation clinic (HealthSouth), the property to the east is vacant land, and the properties to the west and south are commercial (physician offices/clinic) and gas station (Speedway). It appears that the site and surrounding areas were largely farmland until construction of Heartland Drive in the 1980s. Some structures (appear to be residential) were located west of the site in the early topographic maps and these lots were gradually replaced by commercial uses. Based on available information, historic uses of the adjacent properties have a low potential for current impact to the Site subsurface, assuming that there have been no releases from the Speedway gas station to the west.

According to the EDR report, the Site address is not identified on any federal regulatory databases. Several sites were listed on various databases within the ASTM specified distances of the Site. The closest listings were the properties adjacent to the north (HealthSouth and SuperAmerica/Speedway). The HealthSouth facility has a listed UST (2000-gallon diesel, installed 1987) which is located behind the building and appears to be related to backup power for the hospital. The gas station site has five active USTs (two 12,000-gallon gasoline, 8,000-gallon gasoline, 8,000-gallon diesel, 1,500-gallon kerosene installed in 1986/1987). Information from the EDR Database search does not indicate any leaks or releases from these facilities. Therefore, based on the available information of these sites, the identification of the Responsible Party, current status, and/or their relative proximity to the Site, these sites pose a low potential to impact subsurface condition at the Site.

Recognized Environmental Conditions and Other Findings

No recognized environmental conditions (REC's) were identified at the subject Site.

Data Gaps

The following data gaps were identified during this assessment:

None.

Conclusions

DMG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Vacant Land located at 122 Heartland Drive in Elizabethtown, Hardin County, Kentucky 42701 (the Site). Any exceptions to or deletions from this practice are described in Section 4.1 of this report. There were no RECs identified at the site.

Recommendations

There are no recommendations for further work at the site.

TABLE OF CONTENTS

EXECUTIVE SUMMARY	iii
1.0 PROJECT DESCRIPTION.....	1
1.1 Site Description	1
1.2 Purpose	1
1.3 Reliance.....	2
1.4 Scope of Services.....	2
1.5 User’s Responsibilities & Obligations	2
Data Gap and Data Failure.....	3
2.0 HYDROGEOLOGIC SETTING	4
2.1 Geologic Setting	4
2.2 Area Hydrogeology.....	4
2.3 Records of Water Wells	4
2.4 Hydrologic & Topographic Conditions	4
2.5 Flood Zone Information	5
3.0 HISTORICAL LAND USE REVIEW	6
3.1 Site Use Summary	6
3.3 Aerial Photographs	6
3.3.1 Past Site Uses	6
3.3.2 Past Adjacent Property Uses.....	6
3.4 City Directories	7
3.5 Local Agency Review	8
3.5.2 Elizabethtown Planning Department	8
3.5.3 Hardin County Property Valuation Administrator	8
3.7 Previous Reports and Proceedings	9
4.0 SITE RECONNAISSANCE	10
4.1 Site Access and Limitations	10
4.2 Current Operations/Tenants	11
4.3 On Site Characteristics	11
4.4 Utilities / Building Systems	11
4.5 Chemical Use and Storage.....	11
4.6 Waste Generation / Storage / Disposal	11
4.7 Potential PCB-Containing Equipment.....	11
4.8 Storage Tanks / Drums	11
4.9 Asbestos-Containing Building Materials (ACBM’s)	11
4.10 Lead Based Paint	11
4.11 Radon.....	11
4.12 Mold	11
4.13 Dry Cleaners and/or Laundry Facilities	11
4.15 Surrounding Property Observations.....	12
5.0 REGULATORY REVIEW.....	13
6.0 FINDINGS/OPINIONS/CONCLUSIONS	17
7.0 STANDARD OF CARE.....	18
REFERENCES.....	19

LIST OF FIGURES

1. Site Topographic Map
2. Site Diagram Map

LIST OF APPENDICES

- A. Resumes
- B. Fire Insurance Map Documentation
- C. Aerial Photographs
- D. City Directories
- E. Photographic Documentation
- F. Additional Information
- G. Regulatory Database Evaluation Report

1.0 PROJECT DESCRIPTION

1.1 Site Description

Site Address	The address for the site is 122 Heartland Drive, Elizabethtown, Hardin County, Kentucky 42701. The Property is further described by the Hardin County Property Valuation Administrator as # 202-30-07-002.
Topographic Location (Lat./Long.)	37° 42.840' (Latitude–North) 85° 52.501' (Longitude – West)
Tenant description	The site is vacant land and there are no tenants at the site.
Site acreage, building(s) description	The Site consists of a vacant parcel of land (Lakeview Plaza Lot 2) and the total acreage of the site is 1.502 acres according to the local PVA office. There are no structures on the site.
Site exterior	The property consists of vacant land.

A copy of a portion of the topographic map of the area with the Site location marked is included as Figure 1.

1.2 Purpose

The purpose of this ESA was to identify the potential for *recognized environmental conditions* to exist at the Site. The term recognized environmental conditions means 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 structures on the property or into the ground, groundwater, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to 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 an enforcement action if brought to the attention of appropriate governmental agencies.

DMG understands this ESA is also being completed for purposes of qualifying for Landowner Liability Protections (LLPs) under CERCLA to CERCLA unless otherwise so stated in this report.

Environmental issues or concerns at a property that are outside the scope of ASTM E1527-2005 that parties may wish to assess in connection with commercial real estate transactions include, but are not limited to the following: asbestos-containing materials, radon, lead-based paint, lead in drinking water, wetlands, regulatory compliance, cultural and historic resources, health and safety, ecological resources, endangered species, indoor air quality, and high voltage (EMF) powerlines. These items, unless requested by the client or as deemed relevant to a Site on a case-specific basis, are not included in this ESA.

1.3 Reliance

The Services performed hereunder (including the reports prepared by DMG) are for the use and benefit of C. Richard Byrd III or any of their affiliates, agents and advisors, initial and subsequent holders from time to time of any debt and/or debt securities secured, directly or indirectly, by any participation interest in any such debt, any indenture trustee, servicer or other agent acting on behalf of such holders of such debt and/or debt securities; any rating agencies; and the institutional provider(s) from time to time of any liquidity facility or credit support for such financings, and their respective successors and assigns.

1.4 Scope of Services

DMG's Scope of Services for this Phase I ESA conforms with the American Society for Testing and Materials (ASTM) due diligence standards detailed in the ASTM document "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" (ASTM designation E1527-2005) and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312). Services provided for this project included:

- A review of readily available topographic, geologic, and hydrogeologic information pertaining to the Site and surrounding area;
- A review of readily available information regarding historical land use activities at the Site, and interviews with people that have knowledge regarding the past or present uses of the Site, and with present and past owners, operators, and occupants of the Site, where feasible;
- A reconnaissance of the Site to visually and physically observe the Site for evidence of potential recognized environmental conditions;
- A limited review of federal, State, and local regulatory information records for reported potential environmental hazards on or in the vicinity of the Site; and
- Review of previous environmental reports, if available.

Sampling or analytical testing was not conducted as part of this Phase I ESA. This Phase I ESA does not constitute a regulatory compliance audit of the Site; however, any obvious issues of noncompliance are noted in the report. Copies of resumes of DMG staff involved in the preparation of this report are included as Appendix A.

1.5 User's Responsibilities & Obligations

It is the responsibility of the User to review title and judicial records for environmental liens and activity and use limitations (AULs) pertaining to the property. Mr. C. Richard Byrd III was provided a User Questionnaire to complete, about the existence of environmental liens encumbering the Site property and specialized knowledge and experience or actual knowledge that was material to RECs in connection to the Site and adjoining properties. There was no indication of known environmental conditions on the subject property in the completed questionnaire. A copy of the User's Questionnaire is included in Appendix F.

Data Gap and Data Failure

According to ASTM E1527-05, data gaps occur when the Environmental Professional is unable to obtain information required, despite good faith efforts to gather such information. Data failure is one type of data gap. According to ASTM E1527-05 “data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met”. Pursuant to ASTM Standards, historical sources are required to document property use back to the property’s first developed use or back to 1940, whichever is earlier.

The following data gaps were identified during this assessment:

None.

2.0 HYDROGEOLOGIC SETTING

Readily available hydrogeologic information was reviewed to evaluate surface and subsurface characteristics in the vicinity of the Site. This section summarizes the results of the hydrogeologic evaluation. Information reviewed for this project is listed in the Reference Section.

2.1 Geologic Setting

Published geologic information indicates the following:

Topographic Site Elevation	~757 feet above mean sea level
Surficial Materials	According to the EDR information, the geologic units underlying the Site and environs include Mississippian formations (typically limestone).

2.2 Area Hydrogeology

Published hydrogeologic maps indicate the following:

Depth to groundwater beneath Site	Depth to groundwater is unknown for the site.
Regional groundwater flow direction	Regional groundwater flow direction is unknown for the site. However, based on the general topography of the area, groundwater flow would be anticipated to be southerly or southeasterly.
Sole source aquifer (if present)	N/A

(Groundwater flow direction is estimated. Site specific groundwater flow conditions may be impacted by a variety of factors including, but not limited to, local topography, subsurface karst conditions, geologic anomalies, utilities, nearby wells or sumps, and local drainage patterns. Site-specific groundwater information would require a groundwater investigation, which is beyond the scope of this ESA.)

2.3 Records of Water Wells

According to the EDR Report, there are numerous groundwater wells located within a one-mile radius of the Site. The closest of these wells are located east of the property as the City of Elizabethtown Water Supply is related to Freeman Lake, which is located north of the site (see Figure 1).

2.4 Hydrologic & Topographic Conditions

Based upon a review of the United States Geological Survey 7.5 Minute Topographic Map for the Elizabethtown and Cecilia Quadrangles (USGS, 1989) the site is at an elevation of approximately 757 feet above mean sea level and gently slopes to the south/southeast. Surface water drainage at the Site is expected to flow south/southeast towards Heartland Drive.

2.5 Flood Zone Information

A review of the Flood Insurance Rate Maps, published by the FEMA, was performed. According to FEMA Map for Hardin County 21093C, 0303D, dated 8/16/2007, the Site appears to be outside of a flood zone but this could not be confirmed with the on-line version of the flood map. Note that the subject site is located south of the Freeman Lake reservoir.

Readily available hydrogeologic information was reviewed to evaluate surface and subsurface characteristics in the vicinity of the Site. This section summarizes the results of the hydrogeologic evaluation. Information reviewed for this project is listed in the Reference Section.

3.0 HISTORICAL LAND USE REVIEW

Readily available historical information was reviewed to evaluate the previous uses of the Site, and previous uses of properties in the vicinity of the Site. This section summarizes the results of the historical evaluation. Information reviewed for this project is listed in the Reference Section.

3.1 Site Use Summary

Based upon evidence obtained by DMG from available aerial photographs, Sanborn maps, historic street directories, and the Users Questionnaire, the Site appeared to be vacant land (or farmland) not used for any discernable purpose from as early as 1938 and the site does not appear to have any historic structures. Overall, historic uses of the Site appear to have had low potential for current impact to the Site subsurface.

In general, the area in the vicinity of the Site property began to undergo development with construction of Heartland Drive in 1985. Based on information discussed, historic uses of the adjacent properties have a low potential for current impact to the Site subsurface.

3.2 Sanborn Fire Insurance Maps

Fire insurance maps were created for insurance underwriters and often contain information regarding the uses of individual structures, and the locations of fuel and/or chemical storage tanks, which may have been on a particular property. Review of the EDR fire insurance map collection indicated that there are no Sanborn maps for the Site.

3.3 Aerial Photographs

Aerial photographs for the Site area were available for review at EDR. Photographs for the years 1959, 1960, 1967, 1983, 1988, 1991, 1997, 2006, and 2008 were reviewed for this ESA. Copies of photographs are included in Appendix C.

3.3.1 Past Site Uses

YEAR(S)	USE
1959, 1960, 1967, 1983, 1988, 1991, 1997, 2006, 2008	The aerial photograph depicts the Site as vacant land not used for any discernable purpose.

No previous uses indicative of environmentally suspect practices or activities were identified on the Site. Refer to Section 3.1.

3.3.2 Past Adjacent Property Uses

1959, 1960, 1967	
Direction	Use
North, South, East, West	The aerial photograph depicts the properties as vacant or agricultural land. It appears that a residence may have been located south of the subject site. Freeman Lake to the north is first visible in the 1967 photo.

1983	
Direction	Use
North, East, South	The aerial photograph depicts these areas as vacant or agricultural land.
West	Commercial properties are located to the west along Dixie Highway.

1988, 1991, 1997	
Direction	Use
North	The aerial photograph depicts the Heartland Rehabilitation Hospital to the north.
East	These areas are still undeveloped.
West, South	The aerial photograph depicts the properties to the west as commercial with commercial properties to the southwest across Heartland Drive.

2006, 2008	
Direction	Use
North	The Rehabilitation Hospital is located to the north and the Atria Retirement Village is located to the northeast.
East	The aerial photograph depicts the east adjacent property unchanged (still undeveloped/vacant).
South, West	These areas have been developed for commercial use.

No previous uses indicative of environmentally suspect practices or activities were identified at the surrounding properties except the gas station located to the west (Speedway/SuperAmerica). The Rehabilitation Hospital to the north also has a UST for backup power.

3.4 City Directories

City Directories provide listings, arranged by street address, of facilities for the year the directory was published. DMG obtained a City Directory Abstract Report from EDR for review of listings for the Site and properties in the vicinity of the Site. City directories were available for the following years: 1972, 1976, 1982, 1987, 1991, 1996, 2001, 2006 and 2011. The subject site was not listed in any of the directories searched and there was no listing for Heartland Drive until 1991. The adjacent property at 134 Heartland Drive was identified as HealthSouth Rehabilitation Center/Lakeview Rehabilitation Hospital in 1991 through 2011. Atria Elizabethtown Residential Home Care was listed at 122 Heartland Drive in 2006 and 2011 with Medical Builders of America at this address in 2001. Copies of the city directory information are included as Appendix D.

No previous uses indicative of environmentally suspect practices or activities were identified on the Site. Refer to Section 3.1 and see Appendix D.

No information was provided for surrounding properties in the EDR city directories report. Historic uses of surrounding properties are not expected to have resulted in the potential for current impacts to the Site subsurface. It appears the Site was primarily surrounded by vacant land and later the rehabilitation hospital to the north (134 Heartland Drive) and commercial properties along Dixie Highway. Refer to Section 3.1 and Appendix D.

3.5 Local Agency Review

3.5.2 Elizabethtown Planning Department

CONTACT NAME SOURCE TYPE PHONE NUMBER	COMMENTS
Elizabethtown Planning Department, 200 W. Dixie (270) 765-6121	Reviewed zoning information. Site is zoned as C-2 (commercial).

3.5.3 Hardin County Property Valuation Administrator

CONTACT NAME SOURCE TYPE PHONE NUMBER	COMMENTS
Hardin County PVA, 14 Public Square (270) 765-2129	Obtained the identification number and lot number. File information was limited due to a major fire and loss of county records in about the 1950s. File information indicated that the property was owned by Louis and Mary Simon in 1971/1972 and in 1985/1986 was owned by multiple parties including Dr. Malik.

As indicated previously, the property is identified as 122 Heartland Drive, Lakeview Plaza Lot 2, #202-30-07-002 and is owned by the Malik Children's Trust.

3.5.4 Other Local Environmental Records Sources

Elizabethtown Fire Department

The Elizabethtown Fire Department indicated that there have been no fires or chemical spill incidents at the site.

The following individuals were interviewed in conjunction with this ESA.

CONTACT NAME	AFFILIATION	DATE INTERVIEWED	COMMENTS
Ms. Paula Wheeler	HealthSouth Rehabilitation Hospital	8/16/11	Ms. Wheeler did not have any detailed information for the site.

CONTACT NAME	AFFILIATION	DATE INTERVIEWED	COMMENTS
Dr. Malik	Malik Children's Trust	8/24/11	Dr. Malik indicated that he purchased the property in 1985/1986 and subsequently developed the site. His initial purchase was 12 acres. Dr. Malik indicated that he developed the area, Heartland Drive, and HealthSouth Rehabilitation Hospital. He was not aware of any tanks, dumpsites, or historic structures on the subject site.

Reasonably ascertainable information from city directories, historic aerials and historic topographic maps did not indicate any known or suspect environmental concerns associated with the Site.

3.7 Previous Reports and Proceedings

There were no previous reports associated with the site.

3.8 Chain of Title Search

The commitment for title insurance (Stewart Title Guaranty Company) effective date 7-29-11 was reviewed and this information indicated that the property is owned by Malik Childrens Trust. Based on a review of the title, no suspect environmental concerns were identified. A copy of this Title is located in Appendix F.

4.0 SITE RECONNAISSANCE

Anne Childress of DMG conducted a reconnaissance of the Site on August 19, 2011 to identify potential recognized environmental conditions in connection with the Site. A diagram of the Site is attached as Figure 2. Selected photographs taken during the Site reconnaissance are included as Appendix D.

Identified		Observation
Yes	No	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substances and/or Petroleum Products in Connection with Site Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Aboveground & Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substance and Petroleum Product Containers and Unidentified Containers not in Connection with Site Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Unidentified Substance Containers
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Electrical or Mechanical Equipment Likely to Contain Fluids
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Interior Stains or Corrosion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Strong, Pungent or Noxious Odors
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pool of Liquid
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Drains and Sumps
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pits, Ponds and Lagoons
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stained Soil or Pavement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stressed Vegetation
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Solid Waste Disposal or Evidence of Fill Materials
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Waste Water Discharges
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Wells
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Septic Systems
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other

The Site consists of vacant land consisting of 1.502 acres according to the local PVA. There are no structures located on the property. Most of the lot is a mowed grass lot with some mature trees and a small wooded area located on the northwest part of the site. The property had not been surveyed at the time of reconnaissance and exact property boundaries could not be discerned.

The Site is bound on the east and south by Heartland Drive, to the north/northeast by HealthSouth Rehabilitation Hospital and Atria Retirement Village, and to the west by commercial properties including Hardin Health Care, Speedway gas station, and Commonwealth Family Chiro (see Figure 2).

During the Site reconnaissance, no Recognized Environmental Concerns (REC's) were noted for the Site.

4.1 Site Access and Limitations

There were no access limitations to the site. Weather at the time of reconnaissance was sunny and hot.

4.2 Current Operations/Tenants

The Site is vacant and there are no current operations or tenants located on the property.

4.3 On Site Characteristics

During the Site visit, no apparent hazardous materials, hazardous waste, sludge ponds, monitoring wells, underground storage tanks, or hazardous conditions were noted.

4.4 Utilities / Building Systems

There are no active utilities located on the property.

4.5 Chemical Use and Storage

There were no chemical use or storage areas at the site.

4.6 Waste Generation / Storage / Disposal

There were no wastes visible at the site with the exception of minor trash.

4.7 Potential PCB-Containing Equipment

No PCB-containing equipment was identified by visual observation during the Site investigation.

4.8 Storage Tanks / Drums

No aboveground storage tanks or evidence of underground storage tanks, such as fill pipes/ports or vent pipes, were observed on the Site.

4.9 Asbestos-Containing Building Materials (ACBM's)

There are no structures located on the property.

4.10 Lead Based Paint

There are no structures located on the property.

4.11 Radon

According to the EPA's Map of Radon Zones for Kentucky (1993), the site is located in EPA Zone 2 (predicted to have an average indoor radon screening potential between 2 and 4 pCi/L).

4.12 Mold

There are no structures located on the property.

4.13 Dry Cleaners and/or Laundry Facilities

No dry cleaners or laundry facilities are currently located on the Site.

4.14 Potential Additional Unidentified Site Concerns

No potential additional unidentified Site concerns were identified as a result of this ESA.

4.15 Surrounding Property Observations

General observations of properties adjoining the Site were conducted in conjunction with on-Site observations made August 19, 2011 during DMG's Site reconnaissance and are summarized below.

SURROUNDING PROPERTY OBSERVATIONS		
Direction	Use	Observed Chemical Use/Storage?
North	The Site is bordered by HealthSouth Rehabilitation Hospital to the north and Atria Elizabethtown Retirement Home to the northeast.	Yes, tank/emergency generator area appears to be located at the rear of the hospital site.
East, South	The Site is bordered by Heartland Drive with vacant property located across Heartland Drive to the east.	No
West	The Site is bordered by Hardin Health Care, Speedway Gas Station and Commonwealth Family Chiro to the west. These properties are located along Dixie Highway. Tanks located on gas station property are at least 100-120 feet west of the site.	Yes, USTs located at Speedway gas station to the west.

Based on information discussed, the current surrounding properties are not expected to have resulted in the potential for current impact to the Site subsurface. EDR Database information does not indicate releases from tanks located at either Speedway or HealthSouth.

5.0 REGULATORY REVIEW

DMG reviewed regulatory agency database information compiled by Environmental Data Resources, Inc. (EDR) to help identify recognized environmental conditions in connection with the Site. Unless stated otherwise in this section, the scope of DMG's review is limited to review of the information provided by EDR, and does not include review of regulatory agency files pertaining to specific sites that may have been identified. The regulatory review incorporates the Approximate Minimum Search Distances (AMSDs) as set forth by ASTM and any additional Client-specific required search distances that may exceed the AMSDs or as deemed applicable by DMG.

The EDR report includes an Orphan list of facilities that could not be precisely located due to inadequate address information. DMG reviewed this list and determined where these facilities are located relative to the Site and none of the orphan listings appear to be on or near the subject property... The information was incorporated into the discussion of the appropriate database. Additionally, DMG's field survey verifies the locations of EDR-identified facilities in relation to the Site, and, if necessary, adjusts their distances and directions with respect to their actual locations.

The results of the review for each database are discussed below. The locations for the facilities discussed in this section are shown on the figures in the EDR report, included as Appendix G. A detailed description of each regulatory database searched is included in the EDR Report.

The following databases were searched:

- Federal NPL
- Federal Delisted NPL
- Federal CERCLIS
- Federal CERCLIS NFRAP
- Federal RCRA CORRACTS
- Federal RCRA non-CORRACTS TSD facilities
- **Federal RCRA Generators**
- Federal institutional controls/engineering controls registries
- Federal ERNS
- **State CERCLIS/Hazardous Waste Site List**
- State Solid Waste Facilities/Landfills
- State Leaking Underground Storage Tanks

- **State UST List**
- State Institutional Controls lists
- State Voluntary Cleanup sites
- State Brownfield's
- Local Landfill/Solid Waste Disposal Sites
- Local Lists of Hazardous Waste Sites/contaminated sites
- Local land records
- Records of emergency releases
- Other records such as **RCRA-non generators**, DOT OPS, DOD, FUDS, CONSENT, ROD, UMTRA, MINES, TRIS, TSCA, FTTS, **MANIFEST**, Historic FTTS, SSTS, ICIS, PADS, MLTS, RADINFO, FINDS, RAATS, Drycleaners, NPDES, AIRS, LEAD, Indian Reservations, SCRD Drycleaners, Coal ASH EPA, Financial Assurance, Coal ASH DOE, COAL ASH, PCB Transformer, Manufactured Gas Plants

Lists shown in bold (above) indicate that there are listed sites within the search radius of the property. Note that the subject property was not listed on any of the databases searched. A copy of the EDR database search is attached (Appendix G).

The following presents a discussion of listed sites within the databases searched.

RCRA - Generators List (CESQG): RCRA Info is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites, which generate, transport, store, treat, and/or dispose of hazardous waste as defined by RCRA. Conditional exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste or less than 1 kg of acutely hazardous waste per month. The most recent list was reviewed and there was one listed site within the search radius. This site is the following:

Swope Motors Inc.
North Dixie Highway

This site is located about 1/8-1/4 mile north of the site and is also on the FINDS list and information from EDR indicates that this facility has had several violations in 1995 and these violations appear to have been corrected. Given this information and the location, this facility is not expected to have affected the subject site.

RCRA Non-Generator: This list includes selective information on sites, which generate, transport, store, or treat hazardous wastes. The sites listed on the RCRA Non-Generator list do not presently generate hazardous waste. A review of this database indicated that there were several listed sites within the search radius of the property and these sites are the following:

Elizabethtown Water Plant #2
1011 North Dixie Highway

SuperAmerica #5656
1005 Dixie Highway

The water plant facility is located east of the property (at least 1/8 mile from the site) and is not shown to have any violations. Given the information and the property location, it is not expected to have affected the subject property. SuperAmerica also has no violations and therefore, it is not expected to have affected the property.

UST-Underground Storage Tank: This list contains registered underground storage tanks regulated under Subtitle I of RCRA and must be registered with the state department responsible for administering the UST program. A review of this database indicated that there were several listed sites within the search radius of the property and these sites are the following:

HealthSouth Rehabilitation Hospital of Central KY
134 Heartland Drive

SuperAmerica #5656
1005 Dixie Highway

Cott Beverages USA
1201 N. Dixie Highway

The Cott Beverages site is located at least 1/4-1/2 mile north of the site and the tanks at this facility have been removed and there is no indication of releases from this site and therefore, it is not expected to have affected the subject property. HealthSouth is located directly north of the property and there is a 2,000-gallon diesel tank located on the property, which was installed in 1987. This tank is for the emergency generator and appears to be north of the hospital building and therefore, not directly adjacent to the site. The SuperAmerica (Speedway) site is located west of the property and has five USTs, which were installed at the site in 1986/1987. These tanks (two 12,000-gallon gasoline, one 8,000-gallon gasoline, 8,000-gallon diesel, 1,500-gallon kerosene) appear to be at least 120 feet west of the site and there is no indication of problems at this facility. Therefore, given the available information, neither of these facilities is expected to have affected the subject property.

MANIFEST List: This list appears to contain a database of facilities, which generate hazardous wastes. A review of this database indicated that there was one listed site within the search radius of the property and this facility is the following:

Swope Auto Center
1012 N. Dixie Highway

This facility is located across Dixie Highway from the property and at least 1/8-1/4 mile from the site. Other Swope Motors facilities are also located at least 1/8 mile north of the site and these facilities appear to consist of new and used auto sales along with maintenance activities. However, none of these facilities is directly located in the property vicinity and given the information available, these facilities are not expected to have affected the property.

SHWS-State Leads List: This list contains records of state sites, which are the equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list.

Cott Beverages USA
1201 N. Dixie Highway

Estes West Dixie Ashland
105 St. John Road

Hensley Property
401 Sycamore Street

All of these facilities are listed as closed sites and are located at least 1/4-1/2 miles from the site. Given this information, these SHWS sites are not expected to have affected the property.

FINDS: Facility Index System/Facility Registry System: This list contains facility information regarding sites that are listed on various federal and state lists regarding compliance activities or other environmental matters including PCS, AIRS, DOCKET, FFIS, STATE, and PADS lists. The following facilities were listed within the search radius of the site:

Elizabethtown Water Plant #2
1011 North Dixie Highway

SuperAmerica #5656
1005 Dixie Highway

Swope Motors Inc.
North Dixie Highway

As indicated previously, these facilities are not expected to have affected the subject site.

In addition, none of the orphan listed sites appear to be in the site vicinity.

6.0 FINDINGS/OPINIONS/CONCLUSIONS

The Site consists of a vacant parcel of land with an address of 122 Heartland Drive in Elizabethtown, Hardin County, Kentucky. There are no improvements located on the property.

Based upon evidence obtained by DMG from available aerial photographs, city directories, and historic topographic maps, the property appears to have always been undeveloped property. The subject site is not listed in the EDR Database search and although nearby properties are listed, the EDR Database search does not indicate that there have been releases from these UST sites.

Recognized Environmental Conditions and Other Findings

Based upon the available information, there were no RECs found for the subject site and no further work is recommended.

Data Gaps

The following data gaps were identified during this assessment:

None.

Conclusions

DMG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the vacant land located at 122 Heartland Drive in Elizabethtown, Hardin County, Kentucky 42701 (the Site). Any exceptions to or deletions from this practice are described in Section 4.1 of this report. As previously indicated, there were no RECs identified for the site.

Recommendations

Based on the findings of this Phase I Environmental Site Assessment, no further work is recommended at the site.

7.0 STANDARD OF CARE

The services performed by DMG on this project have been conducted with that level of care and skill ordinarily exercised by reputable members of the profession, practicing in the same locality, under similar budget and time constraints. We declare that to the best of our knowledge one or more of the parties involved in the preparation of this report meet the definition of environmental professional as to be defined in §312.10 of 40 C.F.R. 312 and 12.13.2. One or more of the parties involved in the preparation of this report have the specific qualifications base on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed the all appropriate inquiries in conformance with the standards and practices as set forth in 40 C.F.R. Part 312. No other warranty is expressed or intended.

This report is exclusively for the use and benefit of those listed on the title page of this report and may not be relied upon by any other person or entity without written permission from DMG.

PREPARED BY:

DMG, INC.



Anne S. Childress
Project Engineer
Kentucky PG, License No. 493



REFERENCES

OTHER REFERENCES

U.S. EPA, 1993, EPA's Map of Radon Zones, Kentucky.

Federal Emergency Management Act (FEMA) website.

HISTORICAL REFERENCES

Aerial Photographs – Environmental Data Resources, Inc. (EDR), Milford, Connecticut.

City Directories – Environmental Data Resources, Inc. (EDR), Milford, Connecticut.

Sanborn Maps – Environmental Data Resources, Inc. (EDR), Milford, Connecticut.

Topographic Maps – Environmental Data Resources, Inc. (EDR), Milford, Connecticut

State and Federal Regulatory database Report—Environmental Data Resources, Inc. (EDR)
Milford, Connecticut