PHASE I ENVIRONMENTAL SITE ASSESSMENT

of

Spring Ford County Club Property
29.2 Acre – Farm Land
48 Country Club Road
Limerick Township, Montgomery County, PA 19468

Field Work Conducted and Report Prepared in Accordance with ASTM E-1527-05

Project Number: 2013-01-0- D & L GROUP, LTD Report Date: MAY 31, 2013

Report Prepared for and Reliance Provided to:

Country Club Views II, LLC 886 Vaughn Road Pottstown, PA 19464

Attn: Mr. Gregory Dinnocenti

Prepared by:

The Real Estate Environmental Assessments & Consulting Team



111 Bristol Court 1105-B Carroll Hill Drive Douglassville, PA 19518 West Chester, PA 19382-2302

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1.0 - Executive Summary

1.1 Contract & General Scope of Work

At the request of Mr. Gregory Dinnocenti of *Country Club Views II, LLC* (the Client), The Real Estate Environmental Assessments & Consulting Team, LLC, (*REEACT*) has performed a Phase I Environmental Site Assessment (ESA) of a non-developed, 29.2 acre agricultural parcel of land, located at Spring Ford Country Club, 48 Country Club Road, Limerick Township, Montgomery County, Pennsylvania (Property). This *Phase I Environmental Site Assessment* (Phase I ESA) was completed in general accordance with the scope and limitations set forth in ASTM Practice E 1527-05, and the Scope of Work described in The REEACT proposal dated April 22, 2013, (2013-01-0-D & L Group, LTD - Limerick).

This report is designed to satisfy the requirements for the innocent landowner defense to CERCLA liability as defined in 42 USC 9601 (34) B.

This Phase I ESA was conducted in accordance with ASTM Standard Practice ASTM E 1527-05 to insure that methodologies used constitute appropriate inquiry into the prior uses of the Property consistent with good commercial and customary practice in order to identify and analyze environmental conditions that constitute existing, past, or potential environmental risks associated with a property.

1.2 General Property & Area Information

The Property consisted of approximately 1,271,952 square feet (Sq./Ft.), (29.2) acres of undeveloped agricultural land, was rectangular in shape, and will eventually have future development for the construction of single family residential homes. The Property was agricultural land, with no surface structures of any kind at the time of the site inspection on April 30, 2013. The interior of the Property has always been utilized for agricultural purposes, most recently for sod farming. Areas along the southern and eastern borders were overgrown with trees and vegetation. The Spring Ford Country Club grounds maintenance division utilizes a small portion of the southern area of the Property that borders the golf course for the disposal of pond spoils and discarded landscape debris. Areas along the southern and eastern boundaries of the Property were over grown and partially wooded. The Mingo Creek traverses the Property from north to south along the eastern area of the Property. A municipal storm sewer runs near the Mingo Creek on the Property. The Property owner representatives were not aware of any environmental deed restrictions or violations associated with this Property.

The Property is located on the north side of Spring Ford Country Club, adjacent to the golf course. The Property is bordered by Country Club Road to the west, which is directly across from single family residential homes which are located in a private development called the Country Club Estates. To the east of the Property is bordered by Royersford Road, which also has a residential development directly across from the Property. The residential development is called Walnut Farms, which also consists of single family residential homes. Directly to the north of the Property is agricultural land that borders residential homes to north. The immediate vicinity of the Property is a mix of residential, agricultural, and undeveloped land.

Legal Property Description

The legal description for the Property was obtained through the *D & L Group, LTD, Environmental Data Resources, Inc. (EDR) Environmental Lien and AUL Search,* and by the Montgomery County Recorder of Deeds through an historical deed search conducted by *REEACT.* A deed/indenture was made on the 17th day of September, 1973, between *Paul H. Weaver and Florence H. Weaver, Husband and Wife* (hereinafter called the Grantor), and *Spring Ford Country Club*, (hereinafter called the Grantee). The Parcel Information is as follows; Limerick Township – Block #69; The Deed Book and Page Number are 388, page 109. A copy of the legal description is included in Appendix H - Additional Documentation.

Site and Vicinity General Characteristics

The Property consists of approximately (29.2) acres of land, and was observed as primarily sod farming land with isolated areas of overgrown vegetation and trees on the eastern and southern borders. Mingo Creek runs through the Property from north to south along the eastern area of the Property. The southern border of the Property borders the Spring Ford Country Club golf course. With the exception of the Spring Ford Country Club, the Property is situated in a residential area with no commercial, institutional, retail, or industry located in the general vicinity of the Property.

REEACT did not observe on Tuesday, April 30, 2013, any properties that pose a material treat of release of hazardous substances or petroleum products. *REEACT* did observe gasoline stations, dry cleaners, industrial sites, or manufacturing plants in the general vicinity of the Property. *REEACT* found no surficial evidence of any off-site environmental sources migrating onto the subject site and posing an environmental concern.

Current Use of the Property

The Property is currently used for agricultural uses, which is primarily sod farming. Along the southern portion of the Property, landscape debris, pond spoils, and soil have been deposited by the Spring Ford Country Club's grounds maintenance department. The Property is not developed commercially or residential, and has no road or building structures. The Limerick Township has a storm sewer that runs along the eastern area of the Property.

Physical Setting

REEACT reviewed the 1983 USGS 7.5 Minute Topographic Map Phoenixville, PA 7.5 minute series topographic map (Contour Interval: 10 feet) for this assessment. The Property elevation is approximately 234 feet above Mean Sea Level (MSL) with a nearly level slope downward to the southwest. The Property is not shown on the map. The area surrounding the Property is shown as residential and some specific developments are depicted. A copy of the topographic map can be found in Appendix A - Property Maps and Site Plans of this report.

According to Federal Emergency Management Agency (FEMA) - FEMA Flood Zone Map # 42091C, the subject Property was located in a 100 year flood area.

According to the local USDA NRCS office Wetland Inventory 2007 National Wetland Inventory

obtained from EDR Environmental Data Resources, Inc., the subject Property does contain identified wetland areas.

Historical Research

REEACT was not provided with any information which indicated any valuation reduction for the Property.

Aerial Photographs, City Directories, and Historical Deeds indicate that the Property has always been utilized as agricultural farm land in a family farm and/or residential setting. The Property was purchased by *Spring Ford Country Club* on the 17th day of September, 1973. No environmental liens were reported by the Property owner's representatives or the Client. The legal description for the Property was obtained by the client and the EDR Lien Search. *REEACT* also conducted a review of title records for the Property at the Montgomery County Recorder of Deeds, located at the Montgomery County Court House, Norristown, Pennsylvania.

Evidence of environmental liens or institutional/engineering controls on the Property was not uncovered in the environmental database search. No environmental liens were reported by the Client. The Property Owner did not have any knowledge of any environmental remediation liens or any engineering controls related to construction development, land use restrictions, or institutional controls on the property which would affect the activity and use of the Property. Evidence of environmental liens or institutional/engineering controls on the Property was not uncovered in the Environmental Data Resources, Inc. (EDR) environmental database search. An historical deed search was conducted from the Norristown County Recorder of Deeds; no environmental liens were noted in the deeds. An Environmental Lien and AUL search was conducted by Environmental Data Resources, Inc. (EDR). No environmental liens were reported by EDR.

Environmental Records Research

A review of the state and federal regulatory data as provided by Environmental Data Resources, Inc. has identified the Property and following state or federal listings within the approximate minimum search distance (AMSD) of the Property.

| Standard Environmental Records Review Summary | | | | | | | |
|---|----------------------------|--------------------|-------------------------------|-------------------------|--|--|--|
| Database | Minimum Search Distance | Number of Sites | Subject Property Listed | Concern to Property? | | | |
| FEDERAL DATABASES | | | | | | | |
| Federal NPL List | Federal NPL List | | | | | | |
| FINDS List | NR | 1 | Yes | No | | | |
| NPL Site List | 1.00 mile | 0 | No | No | | | |
| Proposed National Priority List Sites | 1.00 mile | 0 | No | No | | | |

Quotation: 2013-01-0-D & L Group, LTD

| Database | Minimum Search | Number of | Subject | 11 (1) |
|---|----------------|-----------|--------------------|----------------------|
| | Distance | Sites | Property Listed | Concern to Property? |
| Federal CERCLIS List | | | | |
| Superfund (CERCLA) Consent Decrees | 1.00 mile | 0 | No | No |
| FUDS | 1.00 mile | 0 | No | No |
| Deleted National Priority List Sites | 1.00 mile | 0 | No | No |
| CERCLIS Site List | 0.50 mile | 0 | No | No |
| | | | | |
| Federal CERCLIS NFRAP Site L | ist | | | |
| CERCLIS - No Further Remedial Action Planned | 0.25 mile | 0 | No | No |
| | | | | |
| Federal RCRA Facilities List | 1.00 '1 | | | |
| Corrective Action Report | 1.00 mile | 0 | No | No |
| RCRA Non-CORRACTS TSD Facilities | 0.50 mile | 0 | No | No |
| RCRA CORRACTS TSD Facilities List | 1.00 mile | 0 | No | No |
| RCRA Large Quantity Generator List | 0.10 mile | 0 | No | No |
| CCRA Small Quantity Generator ist | 0.10 mile | 0 | No | No |
| CRA - CESQG List | 0.25 mile | 0 | No | No |
| CRA - NonGen List | 0.25 mile | 0 | No | No |
| PILLS List | 0.50 mile | 0 | No | No |
| HST SPILLS List | 0.50 mile | 0 | No | No |
| CRA Admin. Action Tracking ystem | 0.50 mile | 0 | No | No |
| Oxic Release Inventory System | 0.50 mile | 0 | No | No |
| CRAGN List | 0.10 mile | 0 | No | No |
| Sederal ERNS List | | | | |
| RNS List | 0.50 mile | 0 | No | No |
| ICHO LIST | 0.50 mile | <u> </u> | 110 | 110 |

Quotation: 2013-01-0-D & L Group, LTD

| Standard Env | Standard Environmental Records Review Summary | | | | |
|---|---|--------------------|-------------------------------|----------------------|--|
| Database | Minimum Search Distance | Number of Sites | Subject Property Listed | Concern to Property? | |
| NJ SHWS | 0.25 mile | 0 | No | No | |
| Historical Landfill | 0.50 mile | 2 | No | No | |
| Landfill / Solid Waste Disposal Sites List | 0.50 mile | 0 | No | No | |
| State and Tribal Leaking Storag | a Tank Liete | | | | |
| PA LUST List | 0.50 mile | 0 | No | No | |
| PA LAST List | 0.50 mile | 0 | No | No | |
| PA Unregistered LTanks List | 0.50 mile | 0 | No | No | |
| 174 Omegistered Litatiks Eist | 0.50 mile | U | 110 | 140 | |
| State and Tribal Registered Stor | age Tanks | | | | |
| Registered UST List | 0.25 mile | 1 | Yes | No | |
| Registered AST List | 0.25 mile | 0 | No | No | |
| State and Tribal Voluntary Clea | nup Sites | | | | |
| PA VCP List | 0.50 mile | 0 | No | No | |
| Local List of Registered Storage | Tanks | | | | |
| PA ARCHIVE UST | 0.25 mile | 0 | No | No | |
| Local Land Records | | | | | |
| PA ACT 2-DEED | 0.50 mile | 0 | No | No | |
| Other Ascertainable Records | | | | | |
| RCRA NonGen / NLR | 0.25 mile | 0 | No | No | |
| PA Manifest | 0.25 mile | 0 | No | No | |
| NJ Manifest | 0.25 mile | 0 | No | No | |
| FINDS | 0.25 mile | 1 | Yes | No | |
| EDR Exclusive Records | | | | | |
| EDR US Historical Auto Stat | 0.25 mile | 0 | No | No | |
| EDR US Historical Cleaners | 0.25 mile | 0 | No | No | |

Currently the subject Property (29.2 acres of agricultural land) is not listed in the EDR database. The Spring Ford Country Club is listed in the FINDS and Registered Underground Storage tank

(UST) databases. Analysis of the PA Registered UST List indicates the presence of one (1) listed site within the list's AMSD. The Spring Ford Country Club was identified in the PA Registered UST database. Inclusion in the PADEP's UST database is an indicator of the presence of a regulated UST at a site and does not confirm the presence of contamination or a release from an UST. The UST is not located on Property, the Spring Ford Country Club 29.2 acre agricultural parcel of land.

The Spring Ford Country Club utilizes a 550 gallon gasoline UST for their lawn maintenance equipment. The UST is not located near the 29.2 acre agricultural parcel Property. The Environmental Interest/Information System (FINDS) supports the RCRA program by tracking of events and activities related to facilities that generate, store, transport and dispose of hazardous waste. The Spring Ford Country Club UST was identified in the EDR data report (FINDS) as having past violations related to performance standards for new/upgraded tanks and compliance with underground storage tank system release detection requirements. This was verified by REEACT by reviewing the PADEP eFACTS web page. No releases were documented and all performance violations were corrected.

The other site listed in the federal data-bases in the EDR report is the (Reifsneider Farms #1 and #2) listed in the State and Local sections of the EDR Report as having historical landfills on their farms. The Reifsneider site is located on Linfield Country Club Road to the northwest of the Property, and were listed as having inactive historical landfills on the farm properties.

The sites were listed in the EDR report as being owned by responsible parties. Any soil or groundwater contamination originating from the listed site would be the responsibility of the property owners.

Site Reconnaissance & Interviews

A site visit was performed by Mr. Robert W. Hoeveler, Jr., Environmental Professional, on Tuesday, April 30, 2013. Mr. Hoeveler was accompanied by Mr. Kim Kryder, Project Manager for Bursich Associates, Inc., the civil engineering company associated with the future development of the Property. Mr. Kryder reviewed the Property boundaries and was also interviewed about current and historical property uses. Observations noted in this section apply to the Property as it appeared on that day. A walk-through investigation of the interior and exterior of the Property boundaries was performed. The exteriors of adjoining properties were visually evaluated as part of the site reconnaissance. The weather at the time of the site visit was sunny and approximately 55 degrees Fahrenheit. The site reconnaissance is conducted in accordance with ASTM Standard Practice ASTM E 1527-05 to identify and analyze environmental conditions that constitute existing, past, or potential environmental risks associated with a property.

The objective of the site survey was to identify recognized environmental conditions (RECs) and historical recognized environmental conditions (HRECs) at or in the immediate vicinity of the Property by means of visual, surficial review. No evidence of a recognized environmental condition or mishandling of any regulated or non-regulated materials on the Property was observed during the site reconnaissance on Tuesday, April 30, 2013. REEACT found no surficial evidence of any off-site environmental sources migrating onto the subject Property during the site reconnaissance on Tuesday, April 30, 2013.

On April 30, 2013, *REEACT* interviewed *Mr. Kim Kryder*, *Project Manager* (Owner Representative – Bursich Associates, Inc.), regarding the current or historical use of the Subject Property. *Mr. Kryder* completed an Owner/Operator Questionnaire provided by REEACT (attached as Appendix E). *Mr. Kryder* had indicated that the Property has always been undeveloped agricultural land. *Mr. Kryder* had indicated that a sanitary sewer line runs near the Mingo Creek. *Mr. Kryder* did not identify use or past use of the Property that was considered an *REC* or *HREC*.

On April 26, 2013, *REEACT* interviewed *Mr. Gregory Dinnocenti* (Country Club Views II, LLC and D & L Group, Ltd.), regarding the current or historical use of the Subject Property. *Mr. Dinnocenti* completed a Questionnaire provided by *REEACT* (attached as Appendix E). *Mr. Dinnocenti* had indicated that the Property is vacant undeveloped wooded land. *Mr. Dinnocenti* did not identify use or past use of the Property that was considered an *REC* or *HREC*.

On May 23, 2013, *REEACT* interviewed *Mr. Sam Tomeo*, the Spring Ford Country Club Managing Director regarding the current or historical use of the Subject Property. *Mr. Tomeo* said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Tomeo* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

On May 23, 2013, *REEACT* interviewed *Mr. Mark Rubbo*, the Spring Ford Country Club Grounds Maintenance Manager regarding the current or historical use of the Subject Property. *Mr. Rubbo* said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Rubbo* did not identify use or past use of the Property that was considered a *REC* or *HREC*. Mr. *Rubbo* indicated that they deposit land scape debris and pond spoils on the southern border of the Property. Mr. *Rubbo* indicated that the pond spoils are analyzed by a laboratory and that all results meet the established parameters. Mr. *Rubbo* indicated that he can furnish copies of the laboratory reports if needed.

On May 25, 2013, *REEACT* interviewed *Mr*. *Tim Haas*, a code enforcement representative with Limerick Township regarding the current or historical use of the Subject Property. *Mr*. *Haas*, said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr*. *Haas*, was not aware of any current or past violations associated with Property. *Mr*. *Haas*, did not identify use or past use of the Property that was considered a *REC* or *HREC*.

On May 25, 2013, *REEACT* interviewed *Mr. John Zatyczyc*, a representative with the Pennsylvania Department of Environmental Protection regarding the current or historical use of the Subject Property. *Mr. Zatyczyc*, was unaware of any current or historical environmental issues with the Property. *Mr. Zatyczyc* was not aware of any releases or investigations associated with the Property. *Mr. Zatyczyc* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

The client reported no specialized knowledge of *recognized environmental concerns*, *historical recognized environmental concerns*, or other potential environmental concerns in connection with the Property.

No Property valuation reduction related to environmental issues or concerns was reported by the client.

Conditions determined to be *de minimis* are not recognized environmental conditions. The term *de minimis* refers to 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. Conditions determined to be *de minimis* are not *recognized environmental conditions*. *REEACT* observed that the Spring Ford Country Club Grounds Maintenance Department had disposed of tree stumps, soil piles, and piles of sandy pond spoils on the southern Property border near the golf course. *REEACT* also observed that construction materials such as cinder blocks, concrete storm drain pipes, lumber, PVC pipes, and large structural steel girders were deposited near the southern areas of the Property. Some of the debris and a camper hood for a pick-up truck were partially buried in a soil pile.

Additional hazards were not observed on the Property.

Additional hazards were not observed on the adjoining properties.

No material deviations from the standard were made in the preparation of this report.

Additional relevant property characteristics were not observed.

REEACT was not provided with any information which indicated any valuation reduction for the Property.

1.3 Summary of Findings & Conclusion

Significant Data Gaps

Significant data gaps were not encountered during the preparation of this Phase I Environmental Site Assessment.

Recognized Environmental Conditions

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Property. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. This assessment has revealed **no** evidence of *recognized environmental conditions* in connection with the Property.

Based on the findings of this Phase I ESA, *REEACT* recommends no further environmental investigation at this time.

2.0 - Introduction

2.1 Purpose

The purpose of this Phase I ESA was to evaluate the surficial conditions at the site to identify existing or potential recognized environmental conditions (RECs), or historical recognized environmental conditions (HRECs), (as defined by ASTM E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process) affecting the Property.

A recognized environmental condition refers to the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, 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. Conditions determined to be *de minimis* are not recognized environmental conditions. The term *de minimis* refers to 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. Conditions determined to be *de minimis* are not recognized environmental conditions.

The ASTM E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process criteria was specifically designed to "define good commercial and customary practice in the United States of America for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of CERCLA and petroleum products." As such, this practice is intended to constitute "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice." As such, this practice is intended to constitute "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice," which is one of the requirements necessary to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (landowner liability protection).

2.2 Detailed Scope of Services

- REEACT was retained by *Country Club Views II*, *LLC* to conduct a Phase I Environmental Site Assessment as per ASTM E 1527-05 on April 23, 2013;
- Authorization to perform the work was provided by *Mr. Gregory Dinnocenti*, Owner of *Country Club Views II*, *LLC* on April 23, 2013;
- Perform a site visit to identify any obvious visual signs of contamination. Access to all portions of the subject property, including roof(s), storage area(s), and basement(s), if applicable will be necessary. If access is unavailable to any portion of the subject property, ability to complete the scope of services described herein may be hindered);

- Investigation of past and present land use. (Should past use dictate, review of previous site usage to identify the possibility of on-site release or disposal of manufacturing or other waste);
- Investigation of adjacent land use and possible source(s) of contamination;
- Review of pertinent readily available documents and maps regarding geologic and hydrogeologic conditions for the site;
- Review and interpretation of available historical aerial photographs and other readily available historical documentation of the site and vicinity and provide representative copies of the photographs reviewed;
- Review of existing facility for potential PCB or PCB-contaminated electrical equipment (if applicable);
- Review county, state, Pennsylvania Department of Environmental Protection (PADEP) and U.S. Environmental Protection Agency (EPA) lists of known or potential hazardous waste sites or landfills, and sites currently under investigation for environmental violations;
- Conduct inquiries to applicable municipal, county, and state regulatory agencies for information regarding building or environmental permits, environmental violations or incidents and/or status of enforcement actions at the subject property;
- Conduct interviews, if appropriate, with subject property owner or manager and maintenance personnel, if available, to evaluate site history and operation and maintenance procedures; and
- Phase II typically includes, but is not limited to, additional sampling and analysis of water, soil, electrical equipment fluid and building materials. This scope does not include services associated with Phase II of an Environmental Site Assessment. This ESA was not intended to substitute for a regulatory compliance audit of the site.

REEACT did not conduct sampling or laboratory analysis for the suspect presence of microbial growth "Mold", asbestos containing materials (ACM), asbestos containing building materials (ACBM), lead based paint (LBP), potable water supplies, radon emissions, electromagnetic radiation, soil contamination, volatile organic compounds (VOCs), or urea formaldehyde insulation.

The Scope of Work for the Phase I ESA is also included in Appendix F of this report.

2.3 Significant Assumptions

This Phase I ESA was conducted in accordance with ASTM Standard Practice ASTM E 1527-05 to insure that methodologies used constitute appropriate inquiry into the prior uses of the property consistent with good commercial and customary practice in order to identify and analyze environmental conditions that constitute existing, past, or potential environmental risks associated with a property.

Performance, in accord with these standards is intended to reduce, but not eliminate uncertainty with respect to the potential for *RECs* associated with a property.

This report is designed to satisfy the requirements for the innocent landowner defense to CERCLA liability as defined in 42 USC 9601 (34) B.

The recommendations and conclusions discussed herein are based solely and in reliance upon information collected as a result of the work-scope described in the "Detailed Scope of Services." *REEACT* neither certifies as to the accuracy nor renders as opinion as to the accuracy or completeness of the statements of the individuals interviewed, government records obtained, environmental reports prepared by other consultants, laboratory analytical reports, or the database search results provided by the national database service provider. Even when using the ASTM E 1527-05 methodologies, property conditions may exist that could not be identified within the scope of the assessment or which were not reasonably identifiable from the available information. The methodologies of this assessment are not intended to produce all inclusive or comprehensive results, but rather to provide the client with information relating to the property.

2.4 Limitation, And Exceptions

A Phase I ESA is limited by the availability and quality of site documentation. Undocumented, unauthorized releases of hazardous materials, the remains of which are not readily identifiable by visual inspection, are very difficult and often impossible to detect within the scope of such an investigation.

In preparing this report, *REEACT* has relied on certain information provided by various government agencies and officials, interviews, third party environmental database providers, and data available at the time of the site inspection. Although there may be some degree of overlap in the information provided by these various sources, *REEACT* did not attempt to independently verify the accuracy of all information reviewed or received during the course of this Phase I ESA. *REEACT* disclaims any and all liability for any errors, omissions or inaccuracies in information provided by third party sources.

The findings of this report are valid as of the date of this report. Changes in the condition of a property can occur with the passage of time, whether due to natural processes or to the works of man on this or adjacent sites. In addition, changes in state-of-the-art procedures or government regulations may occur. Such changes, which are beyond *REEACT's* control, may render the findings of this report invalid, wholly or in part. *REEACT* has no responsibility for any contingent liabilities for any reason.

The final assessment of the potential for the existence of hazardous material at the subject property should be considered professional opinions based upon the data obtained during the investigations, and should not be considered a definitive statement that hazardous material is or is not present in the area of study. These opinions have been derived in accordance with ASTM Practice E 1527-05.

This report does not constitute legal advice, nor does *REEACT* claim to give legal advice. Any maps, plans, sketches, drawings, or photographs reproduced and included in this report are intended only for the purpose of showing spatial relationships and do not represent legal surveys.

I addition, our survey does not normally include intrusive inspections inside areas behind walls or above ceilings, or beneath existing floors; areas underneath parked motor vehicles; areas obstructed by heavy furniture, stored materials, equipment, etc.; areas obscured by extremely dense vegetation; beneath snow cover; and, inside electric transformers or energized equipment.

2.5 Special Terms and Conditions

All appropriate inquiry into the prior uses of the property was made with good commercial and customary practices in order to identify and analyze REC's constituting existing, past or potential environmental concerns in connection with the Property.

2.6 User Reliance

This assessment was performed at the request of the client utilizing methods and procedures consistent with good commercial or customary practices designed to conform with acceptable industry standards. The independent conclusions represent the best professional judgment of the Environmental Professional based on the conditions that existed and the information and data available to us during the course of this assignment. Factual information regarding operations, conditions, and test data provided by the client, owner, or their representative have been assumed to be correct and complete.

The report may be distributed and relied upon by the client, its successors and assigns.

3.0 - Property Description

A site visit was performed by Mr. Robert W. Hoeveler, Jr., Environmental Professional, on Tuesday, April 30, 2013. The observations noted in this section apply to the site as it appeared on that day. Site maps and plans showing general site layout are provided in Appendix A - Property Maps and Site Plans.

3.1 Property Location and Legal Description

3.1.1 - Property Location

The Property consisted of approximately 1,271,952 square feet (Sq./Ft.), (29.2) acres of undeveloped agricultural land, was rectangular in shape, and will eventually have future development for the construction of single family residential homes. The Property was agricultural land, with no surface structures of any kind at the time of the site inspection on April 30, 2013. The interior of the Property has always been utilized for agricultural purposes, most recently for sod farming. Areas along the southern and eastern borders were overgrown with trees and vegetation. The Spring Ford Country Club grounds maintenance division utilizes a small portion of the southern area of the Property that borders the golf course for the disposal of pond spoils and discarded landscape debris. Areas along the southern and eastern boundaries of the Property were over grown and partially wooded. The Mingo Creek traverses the Property from north to south along the eastern area of the Property. A municipal storm sewer runs near the Mingo Creek on the Property. The Property owner representatives were not aware of any environmental deed restrictions or violations associated with this Property.

The Property is located on the north side of Spring Ford Country Club, adjacent to the golf course. The Property is bordered by Country Club Road to the west, which is directly across from single family residential homes which are located in a private development called the Country Club Estates. To the east of the Property is bordered by Royersford Road, which also has a residential development directly across from the Property. The residential development is called Walnut Farms, which also consists of single family residential homes. Directly to the north of the Property is agricultural land that borders residential homes to north. The immediate vicinity of the Property is a mix of residential, agricultural, and undeveloped land.

3.1.2 - Legal Property Description

The legal description for the Property was obtained through the *D & L Group*, *LTD*, *Environmental Data Resources*, *Inc. (EDR) Environmental Lien and AUL Search*, and by the Montgomery County Recorder of Deeds through an historical deed search conducted by *REEACT*. A deed/indenture was made on the 17th day of September, 1973, between *Paul H. Weaver and Florence H. Weaver*, *Husband and Wife* (hereinafter called the Grantor), and *Spring Ford Country Club*, (hereinafter called the Grantee). The Parcel Information is as follows; Limerick Township – Block #69; The Deed Book and Page Number are 388, page 109.

A copy of the legal description is included in Appendix H - Additional Documentation.

3.2 Site and Vicinity General Characteristics

The Property consists of approximately (29.2) acres of land, and was observed as primarily sod farming land with isolated areas of overgrown vegetation and trees on the eastern and southern borders. Mingo Creek runs through the Property from north to south along the eastern area of the Property. The southern border of the Property borders the Spring Ford Country Club golf course. With the exception of the Spring Ford Country Club, the Property is situated in a residential area with no commercial, institutional, retail, or industry located in the general vicinity of the Property.

REEACT did not observe on Tuesday, April 30, 2013, any properties that pose a material treat of release of hazardous substances or petroleum products. REEACT did observe gasoline stations, dry cleaners, industrial sites, or manufacturing plants in the general vicinity of the Property. REEACT found no surficial evidence of any off-site environmental sources migrating onto the subject site and posing an environmental concern.

3.3 Current Use of the Property

The Property is currently used for agricultural uses, which is primarily sod farming. Along the southern portion of the Property, landscape debris, pond spoils, and soil have been deposited by the Spring Ford Country Club's grounds maintenance department. On May 23, 2013, *REEACT* interviewed *Mr. Mark Rubbo*, the Spring Ford Country Club Grounds Maintenance Manager regarding the current or historical use of the Subject Property. Mr. *Rubbo* indicated that they deposit land scape debris and pond spoils on the southern border of the Property. Mr. *Rubbo* indicated that the pond spoils are analyzed by a laboratory and that all results meet the established parameters. Mr. *Rubbo* indicated that he can furnish copies of the laboratory reports if needed. The Property is not developed commercially or residential, and has no road or structures.

3.4 Descriptions of Structures, Roads, Other Improvements

The Property is currently utilized for farm land, with the exception of a township storm sewer that is in the area of the creek on the Property, there are no roads or building structures.

3.5 Current Use of the Adjoining Properties

The area to the north of the Property was agricultural land similar to the Property, and single family residential homes on the north side of agricultural plot.

The area to the south of the Property was occupied by the golf course for Spring Ford Country Club.

The sites to the east of the Property were occupied by single family residential homes. The residential development is called Walnut Farms, which consists of single family homes.

The area directly to the west of the Property was occupied by single family residential homes in a development called Country Club Estates.

Summary of use of the adjoining properties at the time of the inspection:

| Direction | Development Type | Site Use | Adjoining Street |
|-----------|---------------------------|---|----------------------|
| North | Residential | Agricultural and Single Family Residential Homes. | W. Linfield Road |
| East | Residential | Single Family Residential Homes. | Country Club Road |
| South | Recreational/Institutiona | Spring Ford Country Club Golf Course | Country Club Road |
| West | Residential | Single Family Residential Homes. | Royersford Road |

4.0 - User Provided Information

4.1 Title Records

Title records were provided to *REEACT* by the client and the EDR Lien Search. *REEACT* also conducted a review of title records for the Property from the Montgomery County Recorder of Deeds, located at the Montgomery County Court House, Norristown, Pennsylvania. The following table summarizes title records of ownership since 1940.

A copy of the legal description is included in Appendix H - Additional Documentation.

| Historical Ownership Information | | | | | |
|---|--------------------|-----------------------------|--|--|--|
| Book/Page Number Owner – Use Description | Date (s) Acquired | Final Date (s) of Ownership | | | |
| Book 3888 / Page 109 Spring Ford Country Club | September 17, 1973 | PRESENT | | | |
| Book 2109 / Pages 00301 Paul W. Weaver and Florence H. Weaver, Husband and Wife | August 18, 1950 | September 17, 1973 | | | |
| Jesse M. Ehst and Kathryn W. Ehst, Husband and Wife | 1940 | August 18, 1950 | | | |
| | | | | | |

REEACT did not find any information in these records to indicate any environmental activity and/or use limitations (institutional and engineering controls) on the Property.

4.2 Environmental Liens or Activity and Use Limitations

No environmental liens were reported by the Client. The Property Owner Representative did not have any knowledge of any environmental remediation liens or any engineering controls related to construction development, land use restrictions, or institutional controls on the property which would affect the activity and use of the Property. Evidence of environmental liens or institutional/engineering controls on the Property was not uncovered in the environmental database search. An historical deed search was conducted from the Norristown County Recorder of Deeds; no environmental liens were noted in the deeds. An Environmental Lien and AUL search was conducted by Environmental Data Resources, Inc. (EDR). No environmental liens were reported by EDR.

A copy of the Lien Search reviewed can be found in Appendix C - Historical Research Documentation of this report.

4.3 Specialized Knowledge

The client reported no specialized knowledge of *RECs*, *HRECs* or other potential environmental concerns in connection with the Property or nearby properties. No Property valuation reduction related to environmental issues or concerns was reported by the client.

4.4 Commonly Known or Reasonably Ascertainable Information

REEACT was not provided with any commonly known or reasonably ascertainable information about the Property that was material to *recognized environmental conditions* in connection with the Property.

4.5 Valuation Reduction for Environmental Issues

REEACT was not provided with any information which indicated any valuation reduction for the Property.

4.6 Owner, Property Manager, and Occupant Information

The Property is currently owned by the *Spring Ford Country Club*, and was managed by Mr. Sam Tomoe of the *Spring Ford Country Club*, at the time of the inspection. The Property was agricultural land. Information provided to REEACT by Mr. Tomoe is presented in Section 7.0.

4.7 Reason for Performing the Phase I ESA

This Phase I ESA and report was prepared by *REEACT* at the request of the Client.

The ESA was requested for one or more of the following reasons:

- The Property ESA Site evaluation was part of the requirements for refinancing purposes.
- Assist in the determination whether any immediate actions at the Property are necessary to comply with applicable existing environmental laws and regulations.
- Assist in the evaluation of legal and financial liabilities pertaining to applicable environmental regulations associated with the Property.
- Assist in the evaluation of the Property's overall development potential.
- Constitute partial or whole appropriate inquiry for purposes of CERCLA's innocent landowner defense.

4.8 Other

The user has not made known to the environmental professional any other reason why the user wants to have this Phase I Environmental Site Assessment performed other than the user's desire to qualify for an LLP to CERCLA liability and for refinancing purposes. The Owner did not have any knowledge or experience with the Property that may be pertinent to this ESA.

5.0 - Records Review

5.1 Standard Environmental Records Review

A search of available federal and state environmental records was conducted by Environmental Data Resources, Inc. (EDR). The EDR Radius Report with GeoCheck (Report) for the Property is included in Appendix D-Regulatory Records Documentation of this report.

The provided Report meets or exceeds the regulatory records search requirements of ASTM Practice E 1527-05.

Discrepancies may exist between the EDR report and the findings of *REEACT's* research and reconnaissance regarding sites identified in the Report. Listed facilities may not be plotted in correct locations or may be listed as unmapped sites because of incomplete or incorrect addresses or other inadequate data. When discrepancies occur, the findings of *REEACT's* site reconnaissance and other records review will take precedence over information provided by EDR.

| Standard Environmental Records Review Summary | | | | | |
|---|----------------------------|--------------------|-------------------------------|----------------------|--|
| Database | Minimum Search Distance | Number of Sites | Subject Property Listed | Concern to Property? | |
| | FEDERAL DATABA | ASES | | | |
| Federal NPL List | | | | | |
| NPL Site List | 1.00 mile | 0 | No | No | |
| Proposed National Priority List Sites | 1.00 mile | 0 | No | No | |
| | | | | | |
| Federal CERCLIS List | | | | | |
| Superfund (CERCLA) Consent Decrees | 1.00 mile | 0 | No | No | |
| FUDS | 1.00 mile | 0 | No | No | |
| Deleted National Priority List Sites | 1.00 mile | 0 | No | No | |
| CERCLIS Site List | 0.50 mile | 0 | No | No | |
| | | | | | |
| Federal CERCLIS NFRAP Site I | List | | | | |
| CERCLIS - No Further Remedial Action Planned | 0.25 mile | 0 | No | No | |
| | | | | | |
| Federal RCRA Facilities List | | | | | |

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| Standard Envi | ronmental Record | s Review S | ummary | |
|---|----------------------------|--------------------|-------------------------------|----------------------|
| Database | Minimum Search Distance | Number of Sites | Subject Property Listed | Concern to Property? |
| Corrective Action Report | 1.00 mile | 0 | No | No |
| RCRA Non-CORRACTS TSD Facilities | 0.50 mile | 0 | No | No |
| RCRA CORRACTS TSD Facilities List | 1.00 mile | 0 | No | No |
| RCRA Large Quantity Generator List | 0.10 mile | 0 | No | No |
| RCRA Small Quantity Generator List | 0.10 mile | 0 | No | No |
| RCRA - CESQG List | 0.25 mile | 0 | No | No |
| RCRA - NonGen List | 0.25 mile | 0 | No | No |
| SPILLS List | 0.50 mile | 0 | No | No |
| HIST SPILLS List | 0.50 mile | 0 | No | No |
| RCRA Admin. Action Tracking System | 0.50 mile | 0 | No | No |
| Toxic Release Inventory System | 0.50 mile | 0 | No | No |
| RCRAGN List | 0.10 mile | 0 | No | No |
| Federal ERNS List | | | | |
| ERNS List | 0.50 mile | 0 | No | No |
| STAT | E AND TRIBAL DA | TABASES | | |
| NJ SHWS | 0.25 mile | 0 | No | No |
| Historical Landfill | 0.50 mile | 2 | No | No |
| Landfill / Solid Waste Disposal Sites List | 0.50 mile | 0 | No | No |
| State and Tribal Leaking Storage | Tank Lists | | | |
| PA LUST List | 0.50 mile | 0 | No | No |
| PA LAST List | 0.50 mile | 0 | No | No |
| PA Unregistered LTanks List | 0.50 mile | 0 | No | No |
| State and Tribal Registered Storag | na Tanks | | | |
| Registered UST List | 0.25 mile | 1 | Yes | No |

Phase I ESA: Spring Ford Country Club - 29.2 Acre Property

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| Standard Environmental Records Review Summary | | | | |
|---|----------------------------|--------------------|-------------------------------|----------------------|
| Database | Minimum Search Distance | Number of Sites | Subject Property Listed | Concern to Property? |
| Registered AST List | 0.25 mile | 0 | No | No |
| State and Tribal Voluntary Clea | nup Sites | | | |
| PA VCP List | 0.50 mile | 0 | No | No |
| Local List of Registered Storage | Tanks | | | |
| PA ARCHIVE UST | 0.25 mile | 0 | No | No |
| | | | | |
| Local Land Records | | | 4 | |
| PA ACT 2-DEED | 0.50 mile | 0 | No | No |
| | | | | |
| Other Ascertainable Records | | | | |
| RCRA NonGen / NLR | 0.25 mile | 0 | No | No |
| PA Manifest | 0.25 mile | 0 | No | No |
| NJ Manifest | 0.25 mile | 0 | No | No |
| FINDS | 0.25 mile | 1 | Yes | No |
| | | | | |
| EDR Exclusive Records | | | | |
| EDR US Historical Auto Stat | 0.25 mile | 0 | No | No |
| EDR US Historical Cleaners | 0.25 mile | 0 | No | No |

5.1.1 Federal Environmental Records

The following information concerning environmental conditions at federally regulated facilities located within the AMSD was reported in the EDR Report or otherwise obtained by *REEACT* during reconnaissance and research of the Property.

FINDS

The Environmental Interest/Information System (FINDS) supports the RCRA program by tracking of events and activities related to facilities that generate, store, transport and dispose of hazardous waste.

FINDS - Facility Index System List

| Site Name | SPRINGFORD COUNTRY CLUB | Distance | SITE |
|-------------|-------------------------|-----------|----------|
| Address | 48 COUNTRY CLUB ROAD | Direction | NA |
| City, State | ROYERSFORD, PA 19468 | Elevation | 234 FEET |

The Property has no violations. The FINDS system indicated that the Spring Ford Country Club is regulated by the PADEP due to regulated substances and/or petroleum products utilized in the site operations. A site's presence in the FINDS database does not infer a level of federal activity at that site, nor does it indicate that hazardous conditions necessarily exist at that location. Based on PADEP public information referenced in eFACTs, the Spring Ford Country Club had several past inspection violations during Facility Operations Inspections for the 550 gallon UST. Based on an interview with Mr. John Zatyczyc, a PADEP Environmental Clean-up — Brownsfields Representative, Mr. Zatyczyc indicated that no releases from the UST were documented with the state.

5.1.2 NPL List

The EPA publishes the National Priorities List ("NPL") of uncontrolled or abandoned hazardous waste sites that have been identified for priority remedial actions under the Superfund Program. The NPL is the EPS's list of Superfund Site and represents the worst of all unidentified, uncontrolled, and/or abandoned hazardous waste sites.

Analysis of the NPL did not identify the Property or any sites within a ½ mile radius of the Property as NLP Sites.

5.1.3 Delisted NPL Sites

Delisted NPL sites are sites that have been deleted from the NPL where no further response is necessary. The search did not identify the Property or any sites within the ½ mile radius of the Property as a delisted NPL site.

5.1.4 CERCLIS List

The EPA's list of known or potential hazardous waste sites within the zip code area of the Property was also reviewed. The CERCLIS contains sites that are either proposed to be on or are on the NPL, and sites being assessed by the EPA for possible inclusion on the NPL. A site's presence on the CERCLIS list does not infer a level of federal activity at that site, nor does it indicate that hazardous conditions necessarily exist at that location. A CERCLIS listing is a potential Superfund site currently or previously investigated for a release or threatened release of hazardous waste materials.

The search did not identify the Property or any sites within a one mile radius of the Property as a delisted CERCLIS site.

5.1.5 CERCLIS NFRAP Listings

The CERCLIS NFRAP database is a list archived sites that have been removed and archived from the inventory of CERCLIS sites. A CERCLIS "No Further Action Planned" (NFRAP) facility is a property where, to the best of the EPA's current knowledge, assessment at the facility has been completed and the EPA has determined that no further action will be taken to list this site on the NPL. This decision does not necessarily imply that there is no hazard associated with a listed site; it only implies that, based upon the available information, the location is not meet the criteria to be a NPL site. Several reasons include no measurable contamination levels were found, contamination was delineated and remediated quickly, contamination was not found at levels at levels that would require Federal Superfund or NPL action.

The search did not identify the Property or any sites within a ½ mile radius of the Property as a CERCLIS NFRAP listing.

5.1.6 RCRA Generator List

The EPA maintains a listing of all regulated generators of hazardous wastes as defined by RCRA. A RCRA generator facility is a facility that generates or transports hazardous waste or meets other RCRA requirements. The classifications are as follows; Large Quantity Generator (LQG), Small Quantity Generator, or Conditionally Exempt Small Quantity Generator (RCRA-CESQG).

The Property was not identified on the list. Analysis of the RCRA-SQG and the RCRA-CESQG Generator List indicated no sites within a ½ mile radius of the Property.

5.1.7 RCRA CORRACTS Facilities List

A RCRA CORRACTS facility is a hazardous waste handler with reported violations and corrective action activity.

The radius search did not identify the Property or any sites within a one-mile radius of the Property as RCRA CORRACTS facilities

5.1.8 RCRA CORRACTS TSD Facilities List

The RCRA TSD facility is a facility licensed to store, treat, and dispose of hazardous waste

materials. The radius search did not identify the Property or any sites within a one-mile radius of the Property as RCRA non-CORRACTS TSD facilities.

5.1.9 PA ERNS List

The State maintains an Emergency Response Notification System (ERNS).

Analysis of the ERNS List indicates than an environmental violation, improper handling or storage of regulated or hazardous materials, or a release into the subsurface, etc. has occurred. The radius search did not identify the Property or any sites within a ½ mile radius of the Property as an ERNS facility.

5.1.10 Tribal Land

Tribal land sites are sites with boundaries established by treaty, statute, and/or executive or court order recognized by the Federal Government as territory in which American Indian tribes have primary governmental authority.

The radius search did not identify the Property or any sites within a one-mile radius of the Property as tribal sites.

5.1.11 State/Tribal Sites

The State/Tribal Sites database is a database of sites with the PADEP's Hazardous Sites Cleanup Program.

The radius search did not identify the Property or any sites within a one-mile radius of the Property as State/Tribal Sites.

5.1.12 State/Tribal SWL Sites

State/tribal SWL sites are permitted solid waste landfills.

The radius search did not identify the Property or any sites within a one-mile radius of the Property as State/Tribal SWL Sites.

However, the EDR report identified the (Reifsneider Farms #1 and #2) as having historical landfills on their farms. The Reifsneider site is located on Linfield Country Club Road to the northwest of the Property, and were listed as having inactive historical landfills on the farm properties.

The sites were listed in the EDR report as being owned by responsible parties. Any soil or groundwater contamination originating from the listed site would be the responsibility of the property owners.

5.1.13 State NPL List

The State lists facilities that are identified as NPL sites that have been prioritized for funding and those that are identified as State Priority List ("SPL") Sites. The SPL contains sites that have been ranked to receive funding for remedial actions and/or investigation under the Hazardous Substance Remedial Action Trust Fund.

Analysis of the Pennsylvania NPL List indicates there are not any listed sites present within the list's AMSD. The Property was not identified on the list.

5.1.14 State CERCLIS List

The state regulates and maintains a list of facilities that are considered state-equivalent CERCLIS sites.

Analysis of the Pennsylvania CERCLIS List indicates there are not any listed sites present within the list's AMSD. The Property was not identified on the list.

5.1.15 State Landfill / Solid Waste Disposal Sites List

A list of facilities permitted as solid waste landfills, incinerators or transfer stations is maintained by each state. No active landfills, incinerators or transfer stations were listed in the EDR radius search, however, the two (2) Reifsneider Farms located on Linfield Country Club Road, were listed as having inactive historical landfills on the farm properties.

Analysis of the Pennsylvania Landfill/Solid Waste Disposal Sites List indicates there are not any listed sites present within the list's AMSD. The Property was not identified on the list.

5.1.16 State/Tribal LUST List

Reported leaks from USTs are compiled by the State in a LUST database.

Analysis of the Pennsylvania LUST List indicates there are not any listed sites present within the list's AMSD. The Property was not identified on the list.

5.1.17 PA UNREG LTANKS List

Reported leaks from unregulated USTs are compiled by the State in a PA UNREG LTANKS database.

Analysis of the PA UNREG LTANKS List indicates there are not any listed sites present within the list's AMSD. The Property was not identified on the list.

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5.1.18 State/Tribal Registered USTs and ASTs List

The State regulates and maintains a list of registered underground and aboveground storage tanks. The State/Tribal UST/AST database is the state list of registered USTs and ASTs. Analysis of the PA Registered UST List indicates the presence of one (1) listed site within the list's AMSD. The Spring Ford Country Club was identified in the PA Registered UST database.

Inclusion in the PADEP's UST database is an indicator of the presence of a regulated UST at a site and does not confirm the presence of contamination or a release from an UST. The search did identify the Spring Ford Country Club as having a registered gasoline USTs at their site. The UST is not located on the Property. The Spring Ford Country Club UST was identified in the EDR data report (FINDS) as having past violations related to performance standards for new/upgraded tanks and compliance with underground storage tank system release detection requirements. This was verified by REEACT by reviewing the PADEP eFACTS web page. No releases were documented and all performance violations were corrected.

PA Registered UST List

| Site Name | SPRINGFORD COUNTRY CLUB | Distance | SITE |
|-------------|-------------------------|-----------|----------|
| Address | 48 COUNTRY CLUB ROAD | Direction | NA |
| City, State | ROYERSFORD, PA 19468 | Elevation | 234 FEET |

Analysis of the Pennsylvania Registered UST List indicates the Spring Ford Country Club utilizes a 550 gallon gasoline UST. Inclusion in the PADEP's UST database is an indicator of the presence of a regulated UST at the site and does not confirm the presence of contamination or a release from a UST. The site was listed in the EDR report as being owned by a responsible party. Any soil or groundwater contamination originating from this site would be the responsibility of the property owner. The property is not expected to have an adverse environmental impact on the site. No releases were documented and all performance violations were corrected.

5.1.19 Federal/State/tribal Brownfields Sites

The Federal Brownfield program is a list of EPA Brownfield sites and Superfund sites that have either an institutional or engineering control. State/Tribal Brownfield sites are the PADEP's Land Recycling Program Act II sites, and sites listed on the PA Sitefinder website.

The search did not identify the Property or other sites within a ½ mile radius of the subject Property as Federal/State/tribal brownfield sites.

5.1.20 State/tribal IC/EC Sites

State/Tribal IC/EC sites are sites with institutional or engineering controls in place as part of remediation action completion/response action. Institutional controls include administrative measures, construction restrictions for foundations, subsurface utilities, and infrastructure, groundwater use restrictions, property use restrictions, and post remediation responsibilities and requirements intended to prevent exposure pathways to contaminants remaining on site.

Engineering controls include various forms of surface caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or affect human health.

The search did not identify the Property as a State/tribal IC/EC site or other sites within a ½ mile radius of the subject Property as State/tribal IC/EC sites.

5.1.21 State and Tribal Voluntary Cleanup Sites (VCP)

The VCP listings include completed remedial sites, sites in remedial progress, and ACT 2 Non-Use Aquifer Determination Sites. The State/Tribal Voluntary Cleanup Sites (VCP) provides an incentive to remediate petroleum oil and gasoline related contamination by participants in the program as long as they did not cause or contribute to the contamination. Applicants to the program receive a release of liability to the state in exchange for a successful cleanup of the property.

The search did not identify the Property or other sites within a ½ mile radius of the subject Property as VCP sites.

5.1.22 - Unmappable "Orphan" Sites

Unmapped facilities are those that do not contain sufficient address or location information to evaluate the facility listing locations relative to the site. The EDR report listed two (2) facilities in the ERD Exclusive Records section unmapped section. These facilities are listed in the EDR in Appendix D.

No facilities could be positively identified to be within the AMSD. Due to inaccurate or missing information provided by the appropriate governmental agency, the database search contractor was unable to accurately plot these sites. If we were able to locate such a property within a respectable ASTM search radius, it was included above in the appropriate database sections of this ESA. It was unlikely that these facilities presented a material threat to the Property and are not considered *REC's. REEACT* also determined that neither the Property nor any adjacent properties were identified on the list of unmappable sites.

5.2 Additional Environmental Records Sources

5.2.1 State Records – Pennsylvania Department of Environmental protection (PADEP)

REEACT requested access to records the PADEP may retain for the Property on May 23, 2013. On May 25, 2013, REEACT interviewed Mr. John Zatyczyc, a representative with the Pennsylvania Department of Environmental Protection Brownfields Clean-up Program regarding the current or historical use of the Subject Property. Mr. Zatyczyc, was unaware of any current or historical environmental issues with the Property. Mr. Zatyczyc did not identify use or past use of the Property that was considered a REC or HREC. Mr. Zatyczyc was not aware of any violations associated with Property.

5.2.2 Local Records - Code Enforce - Licensing and Inspection

REEACT contacted the Middletown Township Office of Code Enforcement on May 25, 2013. The Code Enforcement Officer, *Mr. Tim Haas*, was familiar with the Property for years and was unaware of environmental violations or emergency responses associated with the Property. That information is contained in Section 7 of this report.

5.2.3 Fire Department

REEACT contacted the Limerick Township Fire Department on May 23, 2013, and requested access to any historical incident report and/or records (i.e., UST permits, HAZMAT incidents, etc.). However, as of the issuance of this report, a response to our request has not been received. If information of environmental significance is subsequently uncovered in records retained for the Property by the Fire Department, the client and Property owner will be notified verbally and in writing.

5.2.4 Local Environmental Permits for Abatement or Remediation and/or Violations

REEACT did not discover any environmental permits and/or violations for the Property at any of the local offices contacted during the preparation of this ESA.

5.3 Physical Setting Sources

5.3.1 - Topography

REEACT reviewed the 1983USGS 7.5 Minute Topographic Map Phoenixville, PA 7.5 minute series topographic map (Contour Interval: 10 feet) for this assessment. The Property elevation is approximately 234 feet above Mean Sea Level (MSL) with a nearly level slope downward to the southwest. The Property is not shown on the map. The area surrounding the Property is shown as residential and some specific developments are depicted. A copy of the topographic map can be found in Appendix A - Property Maps and Site Plans of this report.

5.3.2 - Regional Geology

The Property is situated within the Brunswick (Trb) Formation, which consists primarily of reddish-brown Shale, siltstone, and mudstone, containing a few green and brown shale interbeds; red and dark-gray, interbedded argillites, near base. Youngest beds in the Brunswick may be Jurassic according to the Geologic Map of Pennsylvania.

5.3.3 - Soil Survey Information

According to the United States Department of Agriculture's Soil Survey of Montgomery County, PA, the predominant soil classification for the Property is as follows:

| Soil Classification | | Penn – Silt Loam |
|---------------------|-------------|-----------------------------|
| Percent Slope | Not Listed | Water Capacity Intermediate |
| Depth | > 35 Inches | Surface Runoff Intermediate |

| Drainage | Well Drained | Hydric Soil Type | Not Hydric |
|-------------------|-------------------|------------------|------------------------|
| Natural Fertility | Not Listed | Formed In | Silt – Clay materials. |
| Permeability | Slow Infiltration | | |

Penn Silt Loam — Class C — Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures. AASHTO Group; Silt-Clay Materials (more than 35 pct. Passing No. 200), Silty Soils.

5.3.4 - Groundwater Depth and Movement

Based on local topography and other physiographic information obtained, the groundwater is anticipated to flow toward the Mingo Creek in the southeast area of the Property at an unknown depth. However, it is possible that groundwater may not be present in unconsolidated material above bedrock in the area or may be seasonally present along bedrock surfaces. Local features may influence groundwater flow direction; therefore, a complete hydrogeologic investigation would be required to adequately determine groundwater flow direction at the Property.

5.3.5 - Flood Zone Map

According to Federal Emergency Management Agency (FEMA) - FEMA Flood Zone Map # 42091C, the subject Property was located in a 100 year flood area.

5.3.6 - Wetlands Map

According to the local USDA NRCS office Wetland Inventory 2007 National Wetland Inventory obtained from EDR Environmental Data Resources, Inc., the subject Property does contain identified wetland areas.

5.3.7 - Other Maps and Data

No additional maps or other data were provided by the client or obtained during the assessment.

5.4 Historical Use Information on the Property

5.4.1 - Land Use and Development

Aerial Photographs, City Directories, and Historical Deeds indicate that the Property has always been utilized as agricultural farm land in a farming and/or residential setting. The Property was purchased by *Spring Ford Country Club* on the 17th day of September, 1973. No environmental liens were reported by the Client. The legal description for the Property was obtained by the client and the EDR Lien Search. *REEACT* also conducted a review of title records for the Property at the Montgomery County Recorder of Deeds, located at the Montgomery County Court House, Norristown, Pennsylvania.

5.4.2 - City Directories

City directories have been produced for most urban and some rural areas since the late 1800s. The directories were produced by several companies for use by municipalities and private

companies. Historical city directories are often archived as reference documents in research and other libraries; however, these collections are rarely comprehensive. City directories were reviewed for the years 1972, 1980, 1987, 1993, 2001, and 2007. The Property was listed in the database. Based on Property and surrounding properties no *HRECs* or *RECS* were observed.

Representative copies of the City Directories reviewed can be found in Appendix C - Historical Research Documentation of this report.

5.4.3 - Fire Insurance Maps

Sanborn® Fire Insurance Maps were produced for urban areas since the late 1800s and were utilized for determining fire hazards. When available, these maps were reviewed for further documentation concerning the historical use of the Property and surrounding area. A search was conducted locally and through a national database company for all readily available Fire Sanborn® Insurance Maps.

According to information provided by Environmental Data Resources, no Sanborn® Fire Insurance Maps map coverage exists for the Property.

The Property is non-developed agricultural land.

5.4.4 - Aerial Photographs

Aerial photographs of both developed and undeveloped land have been produced since approximately 1930. Historical photographs are often available from local and federal government agencies. Numerous private companies also maintain collections for certain parts of the country. Where available, aerial photographs provide a valuable tool for evaluating the historical use of the Property and surrounding area. A search was conducted locally and/or through national providers for readily available aerial photographs.

Historical aerial photographs of the Property and vicinity were obtained from Environmental Data Resources, Inc. The photographs were reviewed by *REEACT* for indications of previous uses of the Property and potential environmental concerns in the area.

Representative copies of the aerial photographs reviewed can be found in Appendix B – Site Photographs of this report. A summary of the aerial photograph review is as follows:

1937 1942 1946 1957 1965 1968 1971 1988 1992 2002 2005 2008 2010

| Ae | rial Photo Maps - Property | and Adjoining Propertion | es |
|----------------------|----------------------------|--------------------------|----|
| Year / Scale Area | | Details | |

| 2010 (1:500) | Property and Surrounding Properties | Homes: The Property and surrounding properties are much as it is today. The Spring Ford Country Club is depicted to the immediate south of the property, with the golf course on the southern border of the Property. The aerial depicts the residential development, Country Club Estates directly across Country Club Road to the west of the Property. The Walnut Farms residential development which consists of single family residential homes was depicted directly across Royersford Road. Farmland and single family residential homes are depicted to the north of the Property. No observed <i>HRECs</i> or <i>RECs</i> . |
|-----------------|---|--|
| 2008 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club/Residential Single family Homes: The Property and surrounding properties are much as it is today. The aerial also depicts the early phases of construction for the residential development, Country Club Estates, which is directly across Country Club Road to the west of the Property. No observed <i>HRECs</i> or <i>RECs</i> . |
| 2005 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. The Walnut Farms residential development which consists of single family residential homes was depicted directly across Royersford Road. A large family farm with structures is observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are in 2002. No observed <i>HRECs</i> or <i>RECs</i> . |
| 2002 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Single family residential dwellings were observed to the east and southeast of the Property, directly across Royersford Road. A large family farm with structures is observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are in 1988. No observed <i>HRECs</i> or <i>RECs</i> . |
| 1992 (1:500) | Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Single family residential dwellings were observed to the east of the Property, directly across Royersford Road. A large family farm with structures is observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are in 1988. No observed <i>HRECs</i> or <i>RECs</i> . |

| 1988 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Single family residential dwellings were observed to the south east of the Property, directly across Royersford Road. A large family farm with structures is observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are in 1971. No observed <i>HRECs</i> or <i>RECs</i> . |
|-----------------|---|---|
| 1971 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Single family residential dwellings were observed to the south east of the Property, directly across Royersford Road. A large family farm with structures is observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are in 1968. No observed HRECs or RECs. |
| 1968 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Single family residential dwellings were observed to the south east of the Property, directly across Royersford Road. A large family farm with structures is observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are in 1965. No observed HRECs or RECs. |
| 1965 (1:500) | Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Single family residential dwellings were observed to the south east of the Property, directly across Royersford Road. Small family farms, and/or residential dwellings were observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are 1957. No observed HRECs or RECs. |
| 1957 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Single family residential dwellings were observed to the south east of the Property, directly across Royersford Road. Small family farms, and/or residential dwellings were observed to the northwest of the Property, along Linfield Trappe Road. No observed <i>HRECs</i> or <i>RECs</i> . |

| 1946 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land, with the exception of the area to the immediate southwest of the Property, which clearly is the Spring Ford Country Club and golf course. Agricultural farm land is depicted to the immediate north, east, and west of the Property. Historical orchards were no longer observed up-gradient from the Property. Small family farms, and/or residential dwellings were observed to the northwest of the Property, along Linfield Trappe Road. The aerial photograph depicts the demographics much as they are 1942. No observed <i>HRECs</i> or <i>RECs</i> . |
|-----------------|---|--|
| 1942 (1:500) | Property and Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land with no structures. With the exception of the area to the immediate southwest of the Property, which appears to be the Spring Ford Country Club and golf course, agricultural farm land and orchards are depicted to the north, east, and west of the Property. Country Club Road, Linfield Trappe Road, and Royersford Road were depicted to the north, east, and west of the Property. Historical orchards that once existed up-gradient from target properties can sometimes pose environmental concerns due to the heavy use of pesticides. Because the historical orchards have been removed, and developed into residential communities and covered with roads and other infrastructure, no observed <i>HRECs</i> or <i>RECs</i> . The aerial photograph depicts the demographics much as they are 1937. No observed <i>HRECs</i> or <i>RECs</i> . |
| 1937 (1:500) | Surrounding Properties | Agricultural Land/Spring Ford Country Club: The Property and surrounding properties are agricultural land with no structures. With the exception of the area to the immediate southwest of the Property, which appears to be the Spring Ford Country Club and golf course, agricultural farm land and orchards are depicted to the north, east, and west of the Property. Country Club Road, Linfield Trappe Road, and Royersford Road were depicted to the north, east, and west of the Property. Historical orchards that once existed up-gradient from target properties can sometimes pose environmental concerns due to the heavy use of pesticides. Because the historical orchards have been removed, and developed into residential communities and covered with roads and other infrastructure, no observed <i>HRECs</i> or <i>RECs</i> . |

A review of aerial photographs for the Property from 1937 to 2010 did not identify usage of the Property or adjoining sites that was considered evidence of an *REC*, *HREC* or a potential *REC*. The property was always depicted as agricultural land. The surrounding properties have always been the Spring Ford Country Club, agricultural land, and single family residential homes and family farms.

5.4.5 - Historical Topographic Maps

REEACT reviewed the following historical topographic maps published by the United States Geologic Survey (USGS) and obtained from the USGS:

- 1906 Phoenixville, PA 15 Minute, USGS Topographic Map
- 1943 Phoenixville, PA 15 Minute, USGS Topographic Map
- 1955 Phoenixville, PA 7.5 Minute, USGS Topographic Map
- 1968 Phoenixville, PA 7.5 Minute, USGS Topographic Map
- 1973 Phoenixville, PA 7.5 Minute, USGS Topographic Map
- 1983 Phoenixville, PA 7.5 Minute, USGS Topographic Map

The color-coding used on the maps indicates areas that are historically-developed, recently-developed, or undeveloped at the time of the publication of the map.

Based on the review of the historical topographic maps identified above, obvious indications of *RECs* were not observed on the subject site or adjoining properties.

5.4.6 - Prior Reports and Other Documentation

REEACT was not provided with, nor did we obtain, prior Phase I Site Assessment reports or any related environmental reports or investigations for the Property during the investigative process. The owner was not aware of any previous environmental investigations conducted at the Property.

5.4.7 - Building Department Records

Building Department Records were not reviewed during the assessment. The property is agricultural land.

5.4.8 - Zoning/Land Use Records

Zoning Land Use Records were not reviewed during the assessment.

5.4.9 - Property Tax Files

Property Tax Files were not reviewed during the assessment.

5.4.10 - Other Historical Sources

Other Historical Sources were not reviewed during the assessment.

5.4.11 - Historical Use of the Property Table

The following table summarizes historical land uses identified for the Property:

| | Historical Use I | nformation on the P | roperty |
|---------|------------------|---------------------|------------------|
| Year(s) | Property Use | | Reference Source |

| Historical Use Information on the Property | | | |
|--|---|------------------|--|
| Year(s) | Property Use | Reference Source | |
| 1906 – 1983 | Based on the review of the historical topographic maps identified above, obvious indications of RECs were not observed on the subject site or adjoining properties. | | |
| 1937 – 2010 | Based on the review of the historical aerial photographs identified above, obvious indications of RECs were not observed on the subject site or adjoining properties. | | |
| 1940 - Present | Based on the review of the historical deed review, obvious indications of RECs were not observed on the subject site or adjoining properties. | Higtoriaal Doods | |
| 1972 - 2007 | Based on the review of the City Directories identified above, obvious indications of RECs were not observed on the subject site or adjoining properties. | City Dinatany | |

5.5 Historical Use Information on Adjoining Properties

The following table summarizes historical land uses identified for adjoining properties:

| Historical Use Information on Adjoining Properties | | | | | |
|--|---|-------------------------|--|--|--|
| Year(s) | Property Use | Reference Source | | | |
| Adjoining Pro | Adjoining Properties | | | | |
| 1906 – 1983 | Based on the review of the historical topographic maps identified above, obvious indications of RECs were not observed on the subject site or adjoining properties. | | | | |
| Adjoining Pro | perties | | | | |
| 1937 – 2010 | Based on the review of the historical aerial photographs identified above, obvious indications of RECs were not observed on the subject site or adjoining properties. | A swip I Die sta annuit | | | |
| Adjoining Pro | perties | | | | |
| 1972 - 2007 | Based on the review of the City Directories identified above, obvious indications of RECs were not observed on the subject site or adjoining properties. | City Directory | | | |

6.0 - Site Reconnaissance

6.1 Methodology and Limiting Conditions

A site visit was performed by Mr. Robert W. Hoeveler, Jr., Environmental Professional, on Tuesday, April 30, 2013. Mr. Hoeveler was accompanied by Mr. Kim Kryder, Project Manager for Bursich Associates, Inc., the civil engineering company associated with the future development of the Property. Mr. Kryder reviewed the Property boundaries and was also interviewed about current and historical property uses. Observations noted in this section apply to the Property as it appeared on that day. A walk-through investigation of the interior and exterior of the Property boundaries was performed. The exteriors of adjoining properties were visually evaluated as part of the site reconnaissance. The weather at the time of the site visit was sunny and approximately 55 degrees Fahrenheit. The site reconnaissance is conducted in accordance with ASTM Standard Practice ASTM E 1527-05 to identify and analyze environmental conditions that constitute existing, past, or potential environmental risks associated with a property. The objective of the site survey was to identify recognized environmental conditions (RECs) and historical recognized environmental conditions at or in the immediate vicinity of the Property by means of visual, surficial review.

In addition, during the regular course of the site reconnaissance, the environmental professional will also conduct an evaluation of surficial conditions at and in the immediate vicinity of the Property for evidence of significant environmental concerns, moderate environmental concerns, and *de minimis* conditions. *REEACT's* reconnaissance consisted of a systematic traverse of the Property to provide a view of Property improvements, facilities, grounds, and activities. *REEACT* also attempted to visually gather information on the exterior portions of adjacent properties observable from within the boundaries of the Property, or public access vantage points.

6.2 General Site Setting

The Property is located on the north side of Spring Ford Country Club, adjacent to the golf course. The Property is bordered by Country Club Road to the west, directly across from single family residential homes which are located in a private development called the Country Club Estates. To the east of the Property is bordered by Royersford Road, which also has a residential development directly across from the Property. The residential development is called Walnut Farms, which consists of single family residential homes. Directly to the north of the Property is agricultural land that borders residential homes to north. The immediate vicinity of the Property is a mix of residential, agricultural, and undeveloped land.

The Property consisted of approximately 1,271,952 square feet (Sq./Ft.), (29.2) acres of agricultural land with no structures, was rectangular in shape, and will eventually be sub-divided into lot and/or parcels for the future development of residential homes. The Property was overgrown, undeveloped agricultural land, with no structures of any kind at the time of the site inspection on April 30, 2013. The southern and eastern boundaries of the Property had isolated areas of tree growth, and the Mingo Creek traverses the Property from north to south along the eastern area of the Property. The Property at one time was utilized for agricultural purposes, most recently as a sod farm. The Property was not being cultivated or harvested at the time of the

site inspection. The Property owner was not aware of any environmental deed restrictions associated with this Property.

6.2.1 Wells and Cisterns

No evidence of monitoring wells or cisterns was identified on the Property.

6.2.2 Landfills

No landfill activities were identified on the Property.

6.2.3 Biohazardous Waste

No evidence of biohazard waste was observed on the Property.

6.2.4 Stained Soil or Stressed Vegetation

Several piles of burned tree trucks and wood were observed on the southern border near the golf course. The soil from the burned wood appeared to be dark black in color. No evidence of a release exemplified by stained ground cover or stressed vegetation was observed on the Property.

6.2.5 Pits and Sumps

REEACT did not identify any evidence of pits, sumps, drywells or catch-basins on the Property.

6.2.6 Solid Waste Disposal

The Property was agricultural land with no building structures on Tuesday, April 30, 2013. *REEACT* observed that the Spring Ford Country Club Grounds Maintenance Department had disposed of tree stumps, soil piles, and piles of sandy pond spoils on the southern Property border near the golf course. *REEACT* also observed that construction materials such as cinder blocks, concrete storm drain pipes, lumber, PVC pipes, and large structural steel girders were deposited near the southern areas of the Property. Some of the debris and a camper hood for a pick-up truck were partially buried in a soil pile.

6.2.7 Sewage Discharge

Sanitary sewage will be discharged into the municipal sewer when the Property is finally developed.

6.2.8 Process Wastewater

Process wastewater was not currently generated at the Property.

6.2.9 Surface Water Drainage

Surface water on the Property was absorbed into the ground or flowed over land into storm drains.

6.2.10 Utilities

No utilities are available on the Property. When construction is completed, the Property will be serviced by the following utilities:

| Utility | Present / Provider | |
|----------|-------------------------------|--|
| Electric | Philadelphia Electric Company | |
| Water | American Water Company | |
| Gas | PECO | |
| Sewer | Limerick Municipal Authority | |

6.2.11 Additional Property Conditions

A municipal storm sewer is located on the eastern area of the Property near the creek.

6.3 Exterior Observations

6.3.1 Landfills

No landfill activities were identified on the Property.

6.3.2 - Summary of Exterior Observations Table

Summary of exterior observations:

| Category | Item or Feature | Item or Feature Observed |
|--|--|-----------------------------|
| Site Operations, Processes, and Equipment | Emergency generators | NA |
| | Evidence of aboveground storage tanks | NA |
| or Waste Storage | Drums, barrels and/or containers >= 5 gallons | NA |
| Underground Chemical or Waste Storage, Drainage or Collection Systems | Evidence of underground storage tanks or ancillary UST equipment | NA |
| | Sumps, cisterns, catch basins and/or dry wells | NA |
| | Septic tanks and/or leach fields | NA |
| | Pipeline markers | NA |
| Electrical Transformers/ PCBs | Pad or pole mounted transformers and/or capacitors | NA |
| | Generators | NA |
| Evidence of Releases or | Stressed vegetation | NA |
| Potential Releases | Stained soil | NA |
| | Stained pavement or similar surface | NA |

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| - Category | Item or Feature | Item or Feature Observed |
|--|--|-----------------------------|
| | Leachate or waste seaps | NA |
| | Trash, debris and/or other waste materials | Yes |
| | Dumping or disposal areas | Yes |
| | Construction/demolition debris and/or dumped fill dirt | Yes |
| | Surface water discoloration, odor, sheen, and/or free floating product | NA |
| | Strong, pungent or noxious odors | NA |
| | Exterior pipe discharges and/or other effluent discharges | NA |
| | Discharge from roof drains | NA |
| | Discharge other than roof drains | NA |
| | Compressor blowdown | NA |
| Other Notable Site | Surface water bodies | NA |
| Features | Quarries or pits | NA |
| | Monitoring Wells | NA |
| | Additional observations | NA |
| Hazardous Materials and Petroleum Products | Hazardous materials and petroleum products | NA |

6.3.3 Storage Tanks

Historically, underground storage tanks (USTs) and aboveground storage tanks (ASTs) have been documented as being point sources for surface and subsurface contamination. Corrosion of tank materials and improper filling procedures are factors known to contribute to soil and possible groundwater contamination. Determining the presence and locations of USTs and ASTs as part of this investigation is considered essential in assessing this potential contamination source.

Visual inspection of the Property included investigation of the site to identify possible indicators associated with USTs and ASTs such as leakage and vegetative distress. Review of tank registration records and visual inspection of the property are conducted to determine the possible existence of USTs and ASTs in the vicinity of the Property. It must be noted, however, that a lack of registration records and the absence of certain physical site conditions or characteristics may restrict or prevent the definite determination regarding the presence, number of and contents of USTs and ASTs possibly located at the property.

6.3.4 Underground Storage Tanks

No visual evidence of underground storage tanks was identified on the Property. The Property is

farm land with no structures. Spring Ford Country Club and the Property representatives were unaware of any present or historical *USTs* at the Property. No visual evidence of underground storage tanks (USTs) was identified on the Property. However, the Spring Ford Country Club utilizes a 550 gallon gasoline UST for their equipment. The UST is not located near the Property. The Spring Ford Country Club UST was identified in the EDR data report as having past violations related to performance standards for new/upgraded tanks and compliance with underground storage tank system release detection requirements. This was verified by REEACT by reviewing the PADEP eFACTS web page. No releases were documented and all violations were corrected.

6.3.5 Aboveground Chemical or Waste Storage

Evidence of aboveground storage tanks (Exterior)

No exterior above ground chemical or waste storage tanks were observed on the Property during the site reconnaissance on Tuesday, April 30, 2013.

6.3.6 Aboveground Chemical or Waste Storage

Drums, barrels and/or containers >= 5 gallons

No drums, barrels and/or containers were observed on the Property on Tuesday, April 30, 2013.

6.3.7 Polychlorinated Biphenyls (PCBs)

Environmental Protection Agency (EPA) Rule 40 CFR Part 761 states in part that the owner of equipment contaminated with polychlorinated biphenyls (PCBs), such as electrical transformers, is responsible for any environmental liabilities caused by PCB contamination of the environment through leakage, fires, etc. PCB transformer owners must register the transformers with owners of all buildings located within 30 meters of the PCB transformer. A PCB transformer is one containing 500 or more parts per million (ppm) of PCBs. However, if PCB content is unknown (untested by laboratory), the transformers must be considered PCB-contaminated (50 - 499 ppm).

Each large low-voltage capacitor, a small capacitor normally used in alternating current circuits and fluorescent light ballasts manufactured between July 1, 1978, and July 1, 1988, that does not contain PCBs must be marked by the manufacturer with the statement, "No PCBs." This marking must be placed in a position on the exterior of the item so that it can be easily read by any person inspecting or servicing the item.

Suspect PCB-containing articles were not identified on the Property.

6.3.8 Electrical Transformers/ PCBs

Pad or pole mounted transformers and/or capacitors

During preparer's inspection, No pad or pole mounted transformers were observed on the Property.

6.3.9 Other Notable Site Features

Groundwater Monitoring Wells - Soil/Groundwater Remediation Systems

No groundwater monitoring wells or environmental radiation equipment was observed in or around the subject Property.

6.4 Interior Observations

6.4.1 - Building Heating and Cooling

No structures were observed on the Property. The Property is agricultural land.

6.4.2 - Biohazardous Waste

No evidence of biohazard waste was observed on the Property

6.4.3 - Summary of Interior Observations Table

Summary of interior observations:

| Category | Item or Feature | Item or Feature Observed |
|--|--|-----------------------------|
| Site Operations, | Elevators | NA |
| Processes, and | Air compressors | NA |
| Equipment | Hydraulic equipment | NA |
| | Film/X-ray developing equipment | NA |
| Aboveground | Evidence of aboveground storage tanks | NA |
| Chemical or Waste | Drums, barrels and/or containers >= 5 gallons | NA |
| Storage | Cleaning and/or similar supplies | NA |
| | MSDS | NA |
| Underground Chemical or Waste | Evidence of underground storage tanks or ancillary UST equipment | NA |
| Storage, Drainage or | Grease traps | NA |
| Collection Systems | Oil/water separators | NA |
| | Interior floor drains | NA |
| Evidence of Releases | Stained pavement or similar surface | NA |
| or Potential Releases | Laboratory hoods and/or Incinerators | NA |
| | Waste treatment systems and/or water treatment systems | NA |
| Other Notable Site Features | Additional observations | NA |
| Hazardous Materials and Petroleum Products | Hazardous materials and petroleum products | NA |

6.4.4 Site Operations, Processes, and Equipment

Currently no construction operations were observed on the Property.

6.4.5 Aboveground Chemical or Waste Storage

Evidence of aboveground storage tanks Interior

Not observed during site investigation, the Property is agricultural land.

6.4.6 Aboveground Chemical or Waste Storage

Drums, barrels and/or containers >= 5 gallons

Not observed during site investigation, the Property is farm land.

6.4.7 Underground Chemical or Waste Storage, Drainage or Collection Systems Interior floor drains

Not observed during site investigation, the Property is farm land.

6.4.8 Hazardous Materials and Petroleum Products

Hazardous materials and petroleum products

Not observed during site investigation, the Property is farm land.

6.4.9 PCB Light Ballasts

Light fixtures

Not observed during site investigation, the Property is farm land.

6.4.10 Asbestos-Containing Materials

Thermal Insulation, Roofing & Building Materials

Asbestos is a general term applied to a wide variety of naturally occurring fibrous minerals. Historically, asbestos remained a curiosity for centuries, with negligible production until the beginning of the twentieth century when it was used as thermal insulation for steam engines and as an ingredient in building materials. Because asbestos is strong, incombustible and corrosion-resistant, it was widely used in buildings constructed prior to 1975. Asbestos was used in over 3,000 types of construction materials.

The unique physical characteristics of asbestos that make it a good building material are the same characteristics that make it harmful. When inhaled in sufficient quantities, asbestos fibers can cause serious health problems. Although many substances are listed as suspected carcinogens, asbestos is one of the few substances that is a proven carcinogen. For these reasons, federal, state and local governments now regulate the use and removal of Asbestos Containing Materials (ACM).

For informational purposes, a visual review of the building was conducted to identify suspect ACM as part of the site inspection. Materials suspected of containing asbestos were not visually identified.

No suspect ACM or ACBM was observed during site investigation on Tuesday, April 30, 2013.

6.4.11 Explosive Gas

REEACT did not observe any site operation (such as landfilling) or geologic conditions (such as oil or natural gas deposits) that could constitute source of explosive gas.

6.4.12 Airborne and Waterborne Contamination

REEACT did not observe any physical evidence of air borne or water borne contamination from on-site activities or adjacent properties.

6.4.13 Lead Based paint (LBP)

Not observed during site investigation, the Property is agricultural land.

6.4.14 Microbial Contamination (MOLD)

Not observed during site investigation, the Property is undeveloped agricultural land. Visual inspection and testing for mold is beyond the scope of this ESA.

6.4.15 Vapor Intrusion

REEACT did not conduct vapor intrusion assessment, as defined by ASTM E 2600-08, because such evaluation is beyond the scope of this ESA.

6.4.16 Additional Hazard Observations on the Property

Additional hazards were not observed on the Property.

6.4.17 - Additional Hazard Observations on Adjacent Properties

Additional hazards were not observed on the adjoining properties.

7.0 – Interviews

Representative interviews were conducted with various individuals knowledgeable of the Property. The interviews were conducted to determine an awareness of any recognized environmentally related problems or concerns at the Property. Specific information obtained from the noted individuals appears in the appropriate sections of this report.

7.1 Interview with Owner

On April 30, 2013, *REEACT* interviewed *Mr. Kim Kryder*, *Project Manager* (Owner Representative – Bursich Associates, Inc.), regarding the current or historical use of the Subject Property. *Mr. Kryder* completed an Owner/Operator Questionnaire provided by REEACT (attached as Appendix E). *Mr. Kryder* had indicated that the Property has always been undeveloped agricultural land. *Mr. Kryder* had indicated that a sanitary sewer line runs along the Mingo Creek. *Mr. Kryder* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

7.2 Interview with Country Club Views II, LLC

On April 26, 2013, *REEACT* interviewed *Mr. Gregory Dinnocenti* (Country Club Views II, LLC and D & L Group, Ltd.), regarding the current or historical use of the Subject Property. *Mr. Dinnocenti* completed a Questionnaire provided by *REEACT* (attached as Appendix E). *Mr. Dinnocenti* had indicated that the Property is vacant undeveloped wooded land. *Mr. Dinnocenti* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

7.3 Interview with Occupants of Spring Ford Country Club

On May 23, 2013, *REEACT* interviewed *Mr. Sam Tomeo*, the Spring Ford Country Club Managing Director regarding the current or historical use of the Subject Property. *Mr. Tomeo* said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Tomeo* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

On May 23, 2013, *REEACT* interviewed *Mr. Mark Rubbo*, the Spring Ford Country Club Grounds Maintenance Manager regarding the current or historical use of the Subject Property. *Mr. Rubbo* said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Rubbo* did not identify use or past use of the Property that was considered a *REC* or *HREC*. Mr. *Rubbo* indicated that they pile land scape debris and pond spoils on the southern border of the Property. Mr. *Rubbo* indicated that the pond spoils are analyzed by a laboratory and that all results meet the established parameters. Mr. *Rubbo* indicated that he can furnish copies of the laboratory reports if needed.

7.3.1 Interview with Neighbors

Neighbors were not available for interview during the site reconnaissance.

7.4 Interviews with Local and State Government Officials

On May 25, 2013, *REEACT* interviewed *Mr. Tim Haas*, a code enforcement representative with Limerick Township regarding the current or historical use of the Subject Property. *Mr. Haas*, said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Haas*, was not aware of any current or past violations associated with Property. *Mr. Haas*, did not identify use or past use of the Property that was considered a *REC* or *HREC*.

On May 25, 2013, *REEACT* interviewed *Mr. John Zatyczyc*, a representative with the Pennsylvania Department of Environmental Protection regarding the current or historical use of the Subject Property. *Mr. Zatyczyc*, was unaware of any current or historical environmental issues with the Property. *Mr. Zatyczyc* was not aware of any releases or investigations associated with the Property. *Mr. Zatyczyc* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

7.5 Interviews with Others

Additional interviewees were not available for the drafting of this report.

Copies of interview documentation can be found in Appendix E Interview Documentation.

8.0 - Findings

The following findings and opinions were derived from *REEACT's* assessment of the *Spring Ford Country Club* – (29.2 acres of agricultural land) Property, located at 48 Country Club Road, Limerick Township, Montgomery County, Pennsylvania.

REEACT was not provided with any information which indicated any valuation reduction for the Property. No *Property valuation reduction* related to *environmental issues* or concerns was reported by the client or Property owner.

No environmental liens were reported by the Client or Property owner. The client and the Property owner reported no specialized knowledge of recognized environmental concerns (RECs), historical recognized environmental concerns (HRECs) or other potential environmental concerns in connection with the Property.

REEACT was not provided with, nor did we obtain, prior Phase I Site Assessment Reports or any related environmental reports or investigations for the Property during the investigative process. The owner was not aware of any previous environmental investigations conducted at the Property.

Currently the property is agricultural land with no utilities. *Mr. Gregory Dinnocenti* (Country Club Views II, LLC and D & L Group, Ltd.), indicated that the Property will utilize *public water* should residential construction begin. REEACT observed that no wells are utilized on the Property for industrial or public use on April 30, 2013.

Aerial Photographs, City Directories, and Historical Deeds indicate that the Property has always been utilized as agricultural farm land in a family farm and/or residential setting. The Property was purchased by *Spring Ford Country Club* on the 17th day of September, 2013. The legal description for the Property was obtained by the client and the EDR Lien Search. Evidence of environmental liens or institutional/engineering controls on the Property was not uncovered in the environmental database search. An Environmental Lien and AUL search was conducted by Environmental Data Resources, Inc. (EDR). No environmental liens were reported by EDR. No environmental liens were reported by the Client. The Property Owner's representative did not have any knowledge of any environmental remediation liens or any engineering controls related to construction development, land use restrictions, or institutional controls on the property which would affect the activity and use of the Property. An historical deed search was conducted from the Norristown County Recorder of Deeds; no environmental liens were noted in the deeds.

No visual evidence of underground storage tanks was identified on the Property. The Property is farm land with no standing structures. Spring Ford Country Club and the Property representatives were unaware of any present or historical *USTs* at the Property. No visual evidence of underground storage tanks (USTs) was identified on the Property. However, the Spring Ford Country Club utilizes a 550 gallon gasoline UST for their equipment. The UST is not located near the Property. The Spring Ford Country Club UST was identified in the EDR data report (FINDS) as having past violations related to performance standards for new/upgraded tanks and compliance with underground storage tank system release detection requirements. This was verified by REEACT by reviewing the PADEP eFACTS web page. No releases were

documented and all performance violations were corrected.

On April 30, 2013, *REEACT* interviewed *Mr. Kim Kryder*, *Project Manager* (Owner Representative – Bursich Associates, Inc.), regarding the current or historical use of the Subject Property. *Mr. Kryder* completed an Owner/Operator Questionnaire provided by REEACT (attached as Appendix E). *Mr. Kryder* had indicated that the Property has always been undeveloped agricultural land. *Mr. Kryder* had indicated that a sanitary sewer line runs near the Mingo Creek. *Mr. Kryder* did not identify use or past use of the Property that was considered an *REC* or *HREC*.

On April 26, 2013, *REEACT* interviewed *Mr. Gregory Dinnocenti* (Country Club Views II, LLC and D & L Group, Ltd.), regarding the current or historical use of the Subject Property. *Mr. Dinnocenti* completed a Questionnaire provided by *REEACT* (attached as Appendix E). *Mr. Dinnocenti* had indicated that the Property is vacant undeveloped wooded land. *Mr. Dinnocenti* did not identify use or past use of the Property that was considered an *REC* or *HREC*.

On May 23, 2013, *REEACT* interviewed *Mr. Sam Tomeo*, the Spring Ford Country Club Managing Director regarding the current or historical use of the Subject Property. *Mr. Tomeo* said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Tomeo* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

On May 23, 2013, *REEACT* interviewed *Mr. Mark Rubbo*, the Spring Ford Country Club Grounds Maintenance Manager regarding the current or historical use of the Subject Property. *Mr. Rubbo* said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Rubbo* did not identify use or past use of the Property that was considered a *REC* or *HREC*. Mr. *Rubbo* indicated that they deposit land scape debris and pond spoils on the southern border of the Property. Mr. *Rubbo* indicated that the pond spoils are analyzed by a laboratory and that all results meet the established parameters. Mr. *Rubbo* indicated that he can furnish copies of the laboratory reports if needed.

On May 25, 2013, *REEACT* interviewed *Mr. Tim Haas*, a code enforcement representative with Limerick Township regarding the current or historical use of the Subject Property. *Mr. Haas*, said that he was very familiar with the Property and was unaware of any current or historical environmental issues with the Property. *Mr. Haas*, was not aware of any current or past violations associated with Property. *Mr. Haas*, did not identify use or past use of the Property that was considered a *REC* or *HREC*.

On May 25, 2013, *REEACT* interviewed *Mr. John Zatyczyc*, a representative with the Pennsylvania Department of Environmental Protection regarding the current or historical use of the Subject Property. *Mr. Zatyczyc*, was unaware of any current or historical environmental issues with the Property. *Mr. Zatyczyc* was not aware of any releases or investigations associated with the Property. *Mr. Zatyczyc* did not identify use or past use of the Property that was considered a *REC* or *HREC*.

According to Federal Emergency Management Agency (FEMA) - FEMA Flood Zone Map # 42091C, the subject Property was located in a 100 year flood area.

According to the local USDA NRCS office Wetland Inventory 2007 National Wetland Inventory obtained from EDR Environmental Data Resources, Inc., the subject Property does contain identified wetland areas.

REEACT observed that the Spring Ford Country Club Grounds Maintenance Department had disposed of tree stumps, soil piles, and piles of sandy pond spoils on the southern Property border near the golf course. REEACT also observed that construction materials such as cinder blocks, concrete storm drain pipes, lumber, PVC pipes, and large structural steel girders were deposited near the southern areas of the Property. Some of the debris and a camper hood for a pick-up truck were partially buried in a soil pile.

Additional hazards were not observed on the Property.

Additional hazards were not observed on the adjoining properties.

No material deviations from the standard were made in the preparation of this report.

9.0 - Opinion

No evidence of a recognized environmental condition or mishandling of any regulated or non-regulated materials on the Property. *REEACT* found no surficial evidence of any off-site environmental sources migrating onto the subject Property. *Mr. Gregory Dinnocenti* (Country Club Views II, LLC and D & L Group, Ltd.), had indicated that any residential home that they construct will utilize public water and utilities on the subject Property.

REEACT was not provided with any information which indicated any valuation reduction for the Property. No *Property valuation reduction* related to *environmental issues* or concerns was reported by the client or Property owner.

Conditions determined to be *de minimis* are not recognized environmental conditions. The term *de minimis* refers to 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. Conditions determined to be *de minimis* are not *recognized environmental conditions*. *REEACT* observed that the Spring Ford Country Club Grounds Maintenance Department had disposed of tree stumps, soil piles, and piles of sandy pond spoils on the southern Property border near the golf course. *REEACT* also observed that construction materials such as cinder blocks, concrete storm drain pipes, lumber, PVC pipes, and large structural steel girders were deposited near the southern areas of the Property. Some of the debris and a camper hood for a pick-up truck were partially buried in a soil pile.

Currently the subject Property is not listed in the EDR database associated with federal or state environmental violations.

The client, Mr. Gregory Dinnocenti (Country Club Views II, LLC and D & L Group, Ltd.), and the Property representatives, Mr. Sam Tomeo, the Spring Ford Country Club Managing Director, Mr. Mark Rubbo, the Spring Ford Country Club Grounds Maintenance Manager, and Mr. Kim Kryder, Project Manager - (Owner Representative – Bursich Associates, Inc.), regarding the current or historical use of the Subject Property. The aforementioned interviewees were very familiar with the Property and were unaware of any current or historical environmental issues with the Property. The aforementioned interviewees did not identify use or past use of the Property that was considered a REC or HREC.

No visual evidence of underground storage tanks was identified on the Property. The Property is farm land with no structures. The Property owner *was* unaware of any present or historical *USTs* at the Property.

Mr. Gregory Dinnocenti or the Spring Ford Country Club was not aware of any previous environmental investigations conducted at the Property. REEACT was not provided with, nor did we obtain, prior Phase I Site Assessment reports or any related environmental reports or investigations for the Property during the investigative process.

10.0 - Conclusions

10.1 Conclusions

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Property. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. This assessment has revealed no recognized environmental conditions, no historical recognized environmental conditions, and no significant environmental findings in connection with the subject property and/or vicinity.

10.1.1 - Significant Data Gaps

Significant data gaps were not encountered during the preparation of this Phase I Environmental Site Assessment.

10.1.2 - Recognized Environmental Conditions

This assessment has revealed no evidence of recognized environmental conditions in connection with the Property.

10.1.3 - Historical Recognized Environmental Conditions

This assessment has revealed no evidence of recognized environmental conditions in connection with the Property.

10.1.4 - Significant Environmental Concerns

None

10.1.5 - Moderate Environmental Concerns

None

10.1.6 - de minimis Conditions

REEACT observed that the Spring Ford Country Club Grounds Maintenance Department had disposed of tree stumps, soil piles, and piles of sandy pond spoils on the southern Property border near the golf course. REEACT also observed that construction materials such as cinder blocks, concrete storm drain pipes, lumber, PVC pipes, and large structural steel girders were deposited near the southern areas of the Property. Some of the debris and a camper hood for a pick-up truck were partially buried in a soil pile.

10.2 Additional Investigation

Based on the findings of this Phase I ESA, *REEACT* recommends no further environmental investigation at this time.