Voluntary Site Assessment Report
Alabama Department of Environmental Management – Voluntary Cleanup Program
North Country Ford of Jasper
4098 and 4100 Highway 78 East
Jasper, Alabama 35501
Project No: 1660
September 25, 2025

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Alabama Department of Environmental Management
Voluntary Cleanup Program
P.O. Box 301463
Montgomery, AL 36130

SUBJECT: Voluntary Site Assessment
North Country Ford of Jasper
4098 and 4100 Highway 78 East
Jasper, Alabama 35501
Project No: 1660
VCP Number: TBD

Ladies & Gentlemen:

GTEC, LLC is pleased to submit this Voluntary Site Assessment Report for the above-mentioned property. The Voluntary Site Assessment was prepared on behalf of HPH Land Company, LLC and is being submitted to the Alabama Department of Environmental Management (ADEM) Voluntary Cleanup Program (VCP).

GTEC appreciates the opportunity to assist you with this project and looks forward to working with you in the future. Please contact the project personnel below with questions concerning this Voluntary Site Assessment report.

Respectfully submitted,

GTEC,

Alexis Wiltfong, MBA
Environmental Scientist

ALABAMA LICENSED No. 37120-E PROFESSIONAL ENGINEER CHRISTOPHER S. JONES

Christopher S. Jones, P.E.
Senior Engineer

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APPENDICES

1.0 SITE LOCATION AND DESCRIPTION

The subject site is located at 4098 and 4100 Highway 78 East in Jasper, Alabama and consists of Walker County Parcel Numbers 64-17-01-12-3-000-017.002 and 64-17-01-12-3-000-017.001. The property is irregularly shaped and contains about 5.4 acres. Highway 69 forms the western and northern borders to the property and Highway 78 East forms the southern border to the site. The site is occupied by an approximately 35,776 square foot structure that has been occupied by an automotive dealership since its original construction in 1979. The building contains an automotive dealership, service/maintenance center, and detailing center. The remainder of the site is generally paved for automotive parking and storage. A copy of an American Land Title Association (ALTA) survey showing the site layout and identified utilities is provided in Appendix A. The survey also includes the Legal Description of the property.

Development within the immediate vicinity of the site is predominantly located adjacent to the highways. Adjoining properties to the north, across Highway 69, are predominantly residential in use; however, also include commercial developments. Properties to south, across Highway 78 are commercial in use and include a gas station and automotive dealerships. An automotive dealership is also located on the eastern adjoining property, and a used automotive sales business occupies the western adjoining property. Review of the City of Jasper business zoning map shows the subject site and the western, southern, and eastern adjoining properties are zoned B-2, which is defined as a Community Service District. Per the Jasper Code of Ordinances "This district consists of areas where the widest range of commercial uses are permitted at the highest degree of intensity. The district encourages commercial centers to serve the community or region at-large. Commercial activity may be conducted either indoors or, with few exceptions, outdoors. The B-2 District also allows for institutional uses which are compatible with commercial activities."

The onsite structure contains three primary areas including the dealership sales department, service center, and detail center. The service center occupies the northern end of the building, and the detail center is attached to the northeast corner of the service center.

The service center presently contains aboveground automotive lifts. Inground automotive lifts were reportedly used in the eastern service area since it was developed in 1979 until around 2000 when they were removed. Patching in the concrete was observed at former locations of the inground lifts. A trench drain and catchment basin are located within the service center. A second trench drain that reportedly discharges to the municipal sewer is located on the south side of the automotive detail building/bays.

2.0 PHYSICAL SETTING

2.1 Geology

According to the United States Geological Survey, the Pottsville Formation (Upper Part) in the vicinity of the site is composed of cyclic sequences of conglomerates, sandstones, siltstones, mudstones, and coals.

2.2 Soils

The following table shows the soils located onsite based on the National Resources Conservation Service (NRCS) online Web Soil Survey of Alabama.

Table 1-Soils

Soils	Natural Drainage	Permeability	Slopes (%)
Townley-Urban land complex (TuC)	Well drained	Slow	2-15
Townley silt loam (ToD)	Well drained	Moderately slow	6-15
Sunlight-Townley complex (StE)	Well drained	Moderately slow	15-45

2.3 Hydrology

2.3.1 Surface Water

Review of the United States Geological Survey (USGS) 7.5-Minute Topographic Map, Cordova Quadrangle 2024 shows the closest stream to the subject site consists of Poley Creek, located about 1100 feet north of the subject site. Surface water onsite generally flows north across the parking lots toward stormwater control structures.

2.3.2 Groundwater

GTEC estimates the groundwater flow at this site will be to the north based on surface topography and mapped water features. Shallow groundwater was generally not encountered during previous soil and groundwater studies performed at the site, which are discussed later within this report.

2.3.3 Floodplains

Review of the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) Number 010206 dated October 2, 2014 indicates the majority of the subject site is located within

Flood Zones X. Flood Zone X is determined to be outside the 500-year flood zone and is considered an Area of Minimal Flood Hazard.

3.0 PROPERTY USE

3.1 Subject Site

The subject site is presently occupied by North Country Ford of Jasper, an automotive dealership. The site is occupied by an approximately 35,776 square foot structure that has been occupied by an automotive dealership since its original construction in 1979. The onsite structure contains three primary areas including the dealership sales department, service center, and detail center. The service center occupies the northern end of the building, and the detail center is attached to the northeast corner of the service center.

The service center presently contains aboveground automotive lifts. Inground automotive lifts were reportedly used in the eastern service area since it was developed in 1979 until around 2000 when they were removed. Patching in the concrete was observed at former locations of the inground lifts. A trench drain and catchment basin are located within the service center. A second trench drain that reportedly discharges to the municipal sewer is located on the south side of the automotive detail building/bays.

Aboveground Storage Tanks (ASTs) are utilized onsite for petroleum storage. The onsite ASTs include:

- Three 250-gal ASTs containing new oil are located within the service center.
- One 250-gal AST containing waste oil is located on the north side of the service center within a concrete block building/enclosure.
- One 250-gal AST and one 330-gal Intermediate Bulk Container (IBC) tote containing waste oil are located on the north side of the service center outside of and adjacent to the concrete block building/enclosure.
- Several 55-gal drums and smaller containers are used onsite for storage or new and waste automotive fluids.

3.2 Adjoining Properties

Development within the immediate vicinity of the site is predominantly located adjacent to the highways. Adjoining properties to the north, across Highway 69, are predominantly residential in use; however, also include commercial developments. Properties to south, across Highway 78 are commercial is use and include a gas station and automotive dealerships. An automotive dealership is also located on the eastern adjoining property, and a used automotive sales

business occupies the western adjoining property. Review of the City of Jasper business zoning map shows the subject site and the western, southern, and eastern adjoining properties are zoned B-2, which is defined as a Community Service District. Per the Jasper Code of Ordinances "This district consists of areas where the widest range of commercial uses are permitted at the highest degree of intensity. The district encourages commercial centers to serve the community or region at-large. Commercial activity may be conducted either indoors or, with few exceptions, outdoors. The B-2 District also allows for institutional uses which are compatible with commercial activities." Adjoining property to the north is outside the Jasper City Limits and therefore not subject to business zoning districts.

4.0 PROPERTY ASSESSMENTS

GTEC was provided copies of Phase I ESAs and Limited Subsurface Investigations performed at the subject site. The findings of the reports are summarized below, and copies of the reports are provided in the Appendices.

Phase I ESAs- 2016

4098 Highway 78 - On October 5, 2016, TTL issued a Phase I ESA report for the property located at 4098 Highway 78. The property was previously occupied by Phoenix Restaurant; however, was vacant at the time of the study. No Recognized Environmental Conditions (RECs) were identified in the report for 4098 Highway 78. The full report is provided in Appendix B, Page 186.

4100 Highway 78 - On October 5, 2016, TTL issued a Phase I ESA report for the property located at 4100 Highway 78. At the time of the study, the site was occupied by Ford of Jasper. The RECs identified in the report are summarized below:

- Use of the property as an automotive dealership since 1979.
- The historic use of inground automotive lifts in service area.
- Observed oil releases and staining on the concrete slab in the service area, in paved areas north of the service center near an AST containing waste oil, within concrete block enclosure on north side of the service area, and along floor slab adjacent to the northern wall in the eastern and western service areas.

The full report is provided in Appendix B, Page 409.

Phase II ESA-Limited Subsurface Investigation-2017

4100 Highway 78 - On January 1, 2017, G&RK Consulting Associates (GRK) issued a Limited Phase II ESA-Subsurface Investigation covering the property at 4100 Highway 78. The study was

performed as a result of the RECs identified in TTL's Phase I ESA, discussed above. The full report is provided in Appendix B, Page 728.

Five soil borings were advanced during the study using a track-mounted, hollow-stem auger equipped rig. Four borings were located on the north side of the service building and one boring was located on the west side of the service building. Review of the boring logs show the borings were advanced to auger refusal at depths ranging from 12 to 16 feet below the ground surface. Temporary monitoring wells were installed in the borings; however, groundwater was not encountered during drilling or at conclusion of the day's site activities. Two soil samples from each boring were submitted to Empirical Laboratories, LLC for Volatile Organic Compound (VOC) and Polycyclic Aromatic Hydrocarbon (PAH) analysis. Due to a lack of organic vapor readings and lack of encountered groundwater, GRK selected a sample from 4 to 5 feet depth interval and from the bottom of each boring for laboratory analysis. The following table provides the positive results of the soil analysis:

Table 2-VOC Analytical Results 2017

Sample ID	Acetone (mg/kg)	Toluene (mg/kg)	2-Butanone (mg/kg)
SB-01 (4')	0.0613	BDL	0.00642
SB-01 (14')	0.0236	BDL	0.0032
SB-02 (4')	BDL	0.0215	BDL
SB-02 (11')	0.013	BDL	0.00286
SB-03 (5')	0.0255	BDL	BDL
SB-03 (12')	BDL	BDL	BDL
SB-04 (5')	0.00906	BDL	0.00374
SB-04 (13')	BDL	BDL	BDL
SB-05 (4')	0.085	BDL	0.00862
SB-05 (11')	0.0186	BDL	BDL
EPA RSLs Residential Soil November 2024	**7,000**	**490**	**2,700**

BDL: Below Detection Limit
All results and RSLs shown in mg/kg

Copies of the Phase I ESAs performed by TTL in 2016 and the Phase II ESA-Limited Subsurface Investigation were included in the Appendices of a Phase I ESA performed by Partner Engineering and Science for Penney Motor Company, report dated September 8, 2025. The Phase I ESA prepared by Partner Engineering and Science was provided to GTEC by HPH Land Company and is discussed below.

Phase I ESA-2020

Partner Engineering and Science issued a Phase I ESA on September 8, 2020 to Penney Motor Company. The report covered four tax parcels, including the subject site parcels located at 4098 and 4100 Highway 78. In addition, the report covered two tax parcels on the southern adjoining property to the subject site, across Highway 78 which were occupied by Chrysler Dodge Jeep Ram (CDJR) of Jasper.

4100 Highway 78 – At the time the Phase I ESA was prepared the site was occupied by Ford of Jasper. The RECs identified in the report are summarized below:

- The historic use of inground automotive lifts in service area.
- Significant petroleum-like staining below the 250-gal new oil AST in the service area, below the new oil AST and compressor in the concrete block building/enclosure, and below the AST containing waste oil on the north side of the service building.

The report noted that these concerns were previously noted in the TTL's Phase I ESA from 2016. It was the opinion of Partner Engineering and Science that the Phase II ESA-Limited Subsurface Investigation did not adequately address the RECs identified by TTL in the 2016 Phase I ESA since the borings were not placed in the immediate vicinity relative to the specific concerns.

Partner Engineering and Science also identified the trench drains in the service area and detail area as potential environmental concerns; however, formed the opinion that they were not RECs. A copy of the Phase I ESA performed by Partner Engineering and Science, which includes the 2016 Phase I ESAs and 2017 Phase II ESA-Limited Subsurface Investigation is provided in Appendix B of this report.

Phase I ESA-2025

On March 4, 2025, Mill Creek Environmental, LLC (MCE) issued a Phase I ESA to Grey Wolf Automotive Group. The report covered the same four tax parcels covered by the Phase I ESA prepared by Partner Engineering and Science and copy of the report is provided in Appendix C. The RECs associated with 4100 Highway 78 (subject site) are summarized below:

- Use of the property as an automotive dealership since 1979.
- The historic use of inground automotive lifts in service area.
- Petroleum staining observed in several locations similar to the findings of the previous Phase I ESAs performed at the site.

Limited Subsurface Investigation-2025

On April 29, 2025, MCE issued a Limited Subsurface Investigation and Ground Penetrating Radar Scan report, to address the RECs identified by MCE in the Phase I ESA-2025. The ground penetrating radar scan was performed at select locations to look for potential oil/water separators. The scope of work and findings of the Limited Subsurface Investigation and Ground Penetrating Radar Scan are summarized below:

A Ground Penetrating Radar (GPR) scan was performed at select locations of the subject site. No oil/water separators or other environmentally significant subsurface features were identified. Eleven direct push soil borings were drilled in areas of concern at the subject site. The following boring location summary was copied from MCE's Limited Subsurface Investigation report.

"SB-01 This location was selected to assess soil and groundwater conditions in the vicinity of the AST storage area located northeast of the service building and petroleum staining located within the building. The groundcover at this location was concrete. Soil boring SB-01 was drilled to a total depth of 8 ft bgs and was terminated upon sample tool refusal in dry clayey silt. Soil sample SB-01-04 was collected from the 0-4 ft bgs interval based on depth. Groundwater was not encountered and a second soil sample (SB-01-08) was collected from the 4-8 ft bgs interval based on depth. No VOCs were detected in any of the recovered material during PID headspace screening.

SB-02 This location was selected to assess soil and groundwater conditions in the vicinity of the AST storage area located northeast of the service building. The groundcover at this location was concrete. Soil boring SB-02 was drilled to a total depth of 7 ft bgs and was terminated upon sample tool refusal in dry clayey silt. Soil sample SB-02-04 was collected from the 0-4 ft bgs interval based on depth. Groundwater was not encountered and a second soil sample (SB-02-07) was collected from the 4-7 ft gs interval based on depth. No VOCs were detected in any of the recovered material during headspace screening.

SB-03 This location was selected to assess soil and groundwater conditions in the vicinity of former inground lifts located in the service building. The groundcover at this location was concrete. Soil boring SB-03 was drilled to a total depth of 9 ft bgs and was terminated upon sample tool refusal in moist clayey silt. Soil sample SB-03-08 was collected from the 4-8 ft gs interval based on depth and adequate recovered material. Groundwater was not encountered and a second soil sample (SB-03-09) was collected from the 8-9 ft bgs interval based on depth. No VOCs were detected in any of the recovered material during headspace screening.

SB-04 This location was selected to assess soil and groundwater conditions in the vicinity of former inground lifts located in the service building. The groundcover at this location was concrete. Soil boring SB-04 was drilled to a total depth of 11 ft bgs and was terminated upon sample tool refusal in moist clayey silt. Soil sample SB-04-08 was collected from the 4-8 ft bgs interval based on depth and headspace screening results. Groundwater was not

encountered and a second soil sample (SB-04-11) was collected from the 8-11 ft bgs interval based on depth and headspace screening results. Low concentrations of VOCs (less than 10 parts per million (ppm)) were detected in the material recovered from the 4-11 ft-bgs interval during headspace screening.

SB-05 This location was selected to assess soil and groundwater conditions in the vicinity of a previously identified oil spill and cracked foundation in the service building. The groundcover at this location was concrete. Soil boring SB-05 was drilled to a total depth of 9 ft bgs and was terminated upon sample tool refusal in moist clayey silt. Soil sample SB-05-04 was collected from the 0-4 ft bgs interval based on depth and headspace screening results. Groundwater was not encountered and a second soil sample (SB-05-09) was collected from the 8-9 ft bgs interval based on depth and headspace screening results. Low concentrations of VOCs (less than 10 ppm) were detected in the material recovered from the 0-9 ft-bgs interval during headspace screening.

SB-06 This location was selected to assess soil and groundwater conditions in the vicinity of the former inground lifts located in the service building. The groundcover at this location was concrete. Soil boring SB-06 was drilled to a total depth of 10 ft bgs and was terminated upon sample tool refusal in moist clayey silt. Soil sample SB-06-04 was collected from the 0-4 ft bgs interval based on depth. Groundwater was not encountered and a second soil sample (SB-06-10) was collected from the 8-10 ft bgs interval based on depth and headspace screening results. Low concentrations of VOCs (6.0 ppm) were detected in the material recovered from the 8-10 ft-bgs interval during headspace screening.

SB-07 This location was selected to assess soil and groundwater conditions in the vicinity of a floor drain in the service building. The groundcover at this location was concrete. Soil boring SB-07 was drilled to a total depth of 10 ft gs and was terminated upon sample tool refusal in wet clayey silt. Soil sample SB-07-08 was collected from the 4-8 ft bgs interval based on depth and headspace screening results. Groundwater was encountered at a depth of approximately 6 ft-bgs and groundwater sample SB-07-GW was collected. Low concentrations of VOCs (less than 10 ppm) were detected in the material recovered from the 4-10 ft-bgs interval during headspace screening.

SB-08 This location was selected to assess soil and groundwater conditions in the vicinity of former inground lifts located in the service building. The groundcover at this location was concrete. Soil boring SB-08 was drilled to a total depth of 10 ft bgs and was terminated upon sample tool refusal in dry clayey silt. Soil sample SB-08-04 was collected from the 0-4 ft bgs interval based on depth. Groundwater was not encountered and a second soil sample (SB-08-10) was collected from the 8-10 ft bgs interval based on depth and headspace screening results. Low concentrations of VOCs (less than one ppm) were detected in the material recovered from the 8-10 ft-bgs interval during headspace screening.

SB-09 This location was selected to assess soil and groundwater conditions in the vicinity of a previously identified oil spill and cracked foundation in the service building. The

groundcover at this location was concrete. Soil boring SB-09 was drilled to a total depth of 10 ft bgs and was terminated upon sample tool refusal in dry to moist clayey silt. Soil sample SB-09-04 was collected from the 0-4 ft bgs interval based on depth Groundwater was not encountered and a second soil sample (SB-09-10) was collected from the 8-10 ft bgs interval based on depth. Low concentrations of VOCs (less than one ppm) were detected in the material recovered from the 4-8 ft-bgs interval during headspace screening.

SB-10 This location was selected to assess soil and groundwater conditions in the vicinity of the AST storage area located northeast of the service building and petroleum staining located within the building. The groundcover at this location was concrete. Soil boring SB-10 was drilled to a total depth of 7 ft bgs and was terminated upon sample tool refusal in moist clayey silt. Soil sample SB-10-04 was collected from the 0-4 ft bgs interval based on depth. Groundwater was not encountered and a second soil sample (SB-10-07) was collected from the 4-7 ft bgs interval based on depth. No VOCs were detected in any of the recovered material during headspace screening

SB-11 This location was selected to assess soil and groundwater conditions in the vicinity of the AST storage area located northeast of the service building and petroleum staining located within the building. The groundcover at this location was concrete. Soil boring SB-11 was drilled to a total depth of 9 ft bgs and was terminated upon sample tool refusal in moist clayey silt. Soil sample SB-11-04 was collected from the 0-4 ft bgs interval based on depth. Groundwater was not encountered and a second soil sample (SB-11-09) was collected from the 8-9 ft bgs interval based on depth. No VOCs were detected in any of the recovered material during headspace screening."

Soil samples were submitted to Eurofins Analytical Laboratory for VOC, PAH, and RCRA metals analyses. No VOCs were detected in the soil samples submitted for analysis. The positive results of the PAH and RCRA metals analyses are provided in the following tables along with the respective EPA RSLs (Target Risk 1E-06, Hazard Quotient 0.1) November 2024.

Table 3-PAH Results 2025

Sample ID	Anthracene	Benzo[a]anthracene	Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[g,h,i]perylene	Benzo[k]fluoranthene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	Phenanthrene	Pyrene
SB-01-04 (0-4')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-01-08 (4-8')	ND	ND	**0.0048**	**0.0065**	**0.025**	**0.005**	ND	**0.02**	ND	ND	**0.036**	ND	ND
SB-02-04 (0-4')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-02-07 (4-7')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-03-08 (4-8')	**0.110**	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-03-09 (8-9')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-04-08 (4-8')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-04-11 (8-11')	ND	ND	ND	ND	ND	ND	ND	ND	ND	**0.0049**	ND	ND	ND
SB-05-04 (0-4')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-05-09 (8-9')	ND	ND	ND	ND	ND	ND	ND	ND	ND	**0.0073**	ND	ND	ND
SB-06-04 (4-8')	ND	ND	ND	ND	**0.0057**	ND	**0.0026**	ND	ND	ND	ND	**0.006**	**0.002**
SB-06-10 (8-10')	ND	ND	ND	ND	ND	ND	**0.0058**	ND	ND	**0.0043**	ND	ND	ND
SB-07-08 (4-8')	ND	**0.0022**	ND	ND	**0.0076**	ND	**0.0036**	ND	ND	ND	ND	**0.011**	**0.0046**
SB-08-04 (0-4')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	**0.003**	ND
SB-08-10 (8-10')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-09-04 (0-4')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-09-10 (8-10')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-10-04 (0-4')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-10-07 (4-7')	ND	ND	ND	ND	**0.004**	ND	ND	ND	ND	ND	ND	**0.0033**	ND
SB-11-04 (0-4')	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
SB-11-09 (8-9')	**0.019**	ND	ND	ND	ND	ND	**0.015**	ND	**0.0042**	ND	ND	**0.011**	**0.0088**

Sample ID	Anthracene	Benzo[a]anthracene	Benzo[a]pyrene	Benzo[b]fluoranthene	Benzo[g,h,i]perylene	Benzo[k]fluoranthene	Chrysene	Dibenz(a,h)anthracene	Fluoranthene	Fluorene	Indeno[1,2,3-cd]pyrene	Phenanthrene	Pyrene
EPA RSLs Residential Soil	**1,800**	**1.1**	**0.11**	**1.1**	**NA**	**11**	**110**	**0.11**	**240**	**240**	**1.1**	**NA**	**180**

All results shown in mg/kg, ND: Not Detected above the reported detection limit.

Table 4-RCRA Metal Soil Results 2025

Sample ID	Arsenic	Chromium	Lead	Barium
SB-01-04 (0-4')	4.9	13	8.4	21
SB-01-08 (4-8')	3.5	8.3	9	15
SB-02-04 (0-4')	3	7	6.5	13
SB-02-07 (4-7')	2	9.4	10	11
SB-03-08 (4-8')	2.1	13	5.3	15
SB-03-09 (8-9')	2.2	5	4.7	12
SB-04-08 (4-8')	4.1	11	6.2	16
SB-04-11 (8-11')	1.6	5.5	5.6	20
SB-05-04 (0-4')	3	8.5	5.6	11
SB-05-09 (8-9')	3.8	8	6.6	13
SB-06-04 (4-8')	2.7	5.8	4.8	12
SB-06-10 (8-10')	2.5	7.3	8.8	20
SB-07-08 (4-8')	3.8	12	6.7	8
SB-08-04 (0-4')	3.8	7.5	6.1	12
SB-08-10 (8-10')	1.7	10	12	16
SB-09-04 (0-4')	4.3	21	6.1	11

Sample ID	Arsenic	Chromium	Lead	Barium
SB-09-10 (8-10')	2.3	8.7	7.1	13
SB-10-04 (0-4')	2.6	6.9	6	14
SB-10-07 (4-7')	2.4	12	5.3	11
SB-11-04 (0-4')	2.3	5.7	3.8	10
SB-11-09 (8-9')	7.3	14	10	13
EPA RSLs Industrial Soil	**3.0**	**20**	**800**	**22,000**

All results shown in mg/kg
Red results are greater than the EPA RSL for Industrial Soil

Groundwater was only encountered in one boring/temporary monitoring well, SB-07. A groundwater sample was collected from this location and submitted to the Eurofins Analytical Laboratory for VOC, PAH, and RCRA metals analysis.

Acetone was detected at a concentration of 19 ug/L, which is less than EPA RSL for tap water of 1,800 ug/L and methyl tert-butyl benzene (Mtbe) was detected at a concentration of 3.3 ug/L which is less than the EPA RSL for tap water of 14 ug/L. No other VOCs were detected in the groundwater sample.

The following tables show the positive results of the PAH and RCRA Metals analysis along with the EPA RSL for tap water.

Table 5-PAH Groundwater Results 2025

Sample ID	Anthracene	Benzo[a]anthracene	Phenanthrene	Pyrene
SB-07-GW	12	15	31	15
EPA RSLs Tap Water	**180**	**0.030**	**NA**	**12**

All results are in ug/L
NA: No RSL Established
Red results are greater than the EPA RSL for Tap Water

Table 6-RCRA Metals Groundwater Results 2025

Sample ID	Arsenic	Cadmium	Chromium	Lead	Barium
SB-01-04 (0-4')	9.6	1.2	220	370	2,200
MCL	**10**	5	100	10	2,000
EPA RSLs Tap Water	**0.052**	**0.18**	**NA**	**10**	**380**

All results are in ug/L
NA: No RSL Established
Red results are greater than the EPA RSL for Tap Water, or MCL

Based on the results of the Limited Subsurface Investigation, Mill Creek Environmental, LLC recommended postponing the real estate transaction until ADEM was notified and a Responsible Party identified. A copy of the report is provided in Appendix D.

During subsequent conversations with the planned lender, GTEC learned a No Further Action/Letter of Concurrence would be required to facilitate the real estate closing.

Assessment Summary and Opinions-GTEC 2025

Based on review of the previous assessment reports and onsite observations, it is the opinion of GTEC that the Limited Subsurface Investigation performed in 2025 by Mill Creek Environmental adequately addressed the RECs identified in the Phase I ESAs performed in 2016, 2020, and 2025. GTEC believes the detected concentrations of RCRA metals in soil are consistent with naturally occurring background concentrations and are not indicative or the result of an onsite release. The results of the testing support this opinion since the metals were detected at similar concentrations in all the soil samples analyzed. Further, GTEC believes the detected metal concentrations in groundwater are likely a result of suspended sediment in the samples, which Mill Creek Environmental noted as a possibility in their report. Therefore, RCRA metals will not be considered Chemicals of Concern in the following risk assessment.

It is the opinion of GTEC that no additional assessment investigations are warranted based on the findings of the Limited Subsurface Investigations previously performed at the site which include:

- No VOCs or PAHs detected in the soil above EPA RSLs for residential soil.
- The low-level detection of benzo[a]anthracene and pyrene in one groundwater sample collected from an area adjacent to the potential release scenario. It is noted that benzo[a]anthracene was detected in the soil sample from this location at a concentration well below the EPA RSL for residential soil. Benzo[a]anthracene was not detected in any other soil samples during the 2025 Limited Subsurface Investigation. Groundwater was not encountered in the remaining borings drilled at the site.

5.0 CHEMICALS OF CONCERN

Based on the previous studies performed at the site, the identified Chemicals of Concern (COC) include benzo[a]anthracene and pyrene.

6.0 SITE CONCEPTUAL EXPOSURE MODEL

The current and future use of the property will be for commercial purposes. Based on the findings of the studies performed at the site and onsite observations, the suspected release scenarios include poor housekeeping practices related to petroleum storage and the adjacent floor drain. Adjoining properties are fully developed and commercial in use. Therefore, adult commercial workers are the current and most likely future receptors.

No sensitive ecological receptors were identified in the vicinity of the site. The adjoining properties are fully developed.

6.1 Surface and Subsurface Soils

The results of the Limited Subsurface Investigations show no VOCs or PAHs were detected in the soil at the site above the EPA RSLs for residential soil. The subject site is developed and fully paved for automotive storage. Based on the above information, the surface and subsurface soil exposure pathways are considered incomplete.

6.2 Groundwater and Surface Water

No potable groundwater wells were identified onsite, on the adjoining properties, or within 1,000 feet of the subject site. There are no public supply wells within 1-mile of the subject site. The affected area of the site is limited to beneath the existing structure and concrete slab near a floor drain. No surface waters are located on the subject site or the adjoining properties. Therefore, the groundwater ingestion and surface water exposure pathways are considered incomplete.

6.3 Vapor Intrusion-Inhalation

COCs were identified in groundwater below the building's concrete floor slab at concentrations above the EPA's RSLs for tap water. Therefore, the indoor inhalation of vapor emissions pathway is considered complete.

7.0 RISK ASSESSMENT-HUMAN EXPOSURE PATHWAYS

7.1 Groundwater Assessment-Vapor Intrusion

The target COC groundwater concentrations based on residential/unrestricted use of the site were calculated using the EPA's Vapor Intrusion Screening Level (VISL) calculator with default values and the target risk and hazard index equal to $1.00E^{-06}$ and 0.1, respectively. COC concentrations detected in the groundwater sample from SB-07-GW were used as the representative groundwater concentrations and entered into the VISL calculator using the default values. No inhalation toxicity data is available for pyrene; therefore, no output is generated by the VISL calculator

The following table shows the target groundwater concentrations generated by the VISL calculator for the COCs detected in the groundwater.

Table 5: Target Risk 1.0^{-06} and Hazard Quotient 0.1

COC	SB-07-GW (ug/L)	VISL Target Concentration (ug/L)
Pyrene	15.0	NA
Benzo[a]anthracene	15.0	34.4

The detected concentration of benzo[a]anthracene was less than the respective VISL-calculated target groundwater concentrations indicating the COC concentrations detected at the site do not pose an unacceptable risk related to vapor migration into the indoor air.

The VISL-calculated cumulative carcinogenic risk based on the COC concentrations from SB-07-GW was $4.35E^{-07}$. No Hazard Quotient/Index was generated indicating the COC does not pose a non-carcinogenic health risk related to vapor intrusion. The VISL-calculated cumulative carcinogenic risk is significantly less than the allowable target risk of $1.00E^{-05}$.

8.0 SUMMARY AND CONCLUSIONS

This assessment was performed for HPH Land Company, LLC to assist in a proposed real estate transaction. The findings of this assessment are summarized below:

- No VOCs or PAHs have been detected in soil at the site above the EPA RSLs for residential soil.
- RCRA metals were identified in soil at the site at concentrations consistent with naturally occurring background concentrations and are therefore not considered COC.
- Benzo[a]anthracene and pyrene were detected in one groundwater sample at concentrations greater than the EPA RSL for tap water. The sample location was located

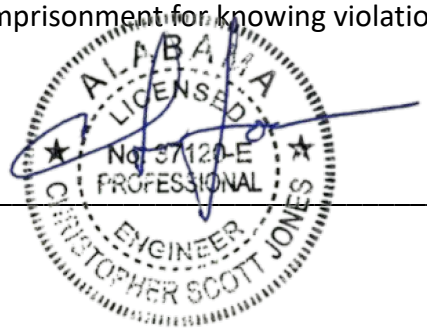
near a floor drain in the service area and appears to be isolated since no groundwater was encountered in the remaining borings/temporary monitoring wells drilled at the site during two previous subsurface investigations.

- The only identified exposure pathway identified during this study consists of indoor inhalation of vapor emissions.
- The detected COC concentrations in the groundwater at the site are less than the EPA VISL calculated target groundwater concentrations protective of the indoor inhalation pathway.
- The VISL calculated cumulative carcinogenic risk for a resident was $4.35E^{-07}$, which is less than the allowable risk of $1.0E^{-05}$. A Hazard Index was not generated since benzo[a]anthracene is primarily considered a carcinogen and there is insufficient health data to determine non-carcinogenic risks.

Therefore, the findings indicate the subject property is suitable for unrestricted use. It is the opinion of GTEC that the identified contamination does not warrant additional investigation or property use restrictions.

9.0 CERTIFICATION

I certify under penalty of law that this document and all attachments, excluding historical reports issued by others, were prepared under my direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



September 25, 2025