

1 COCHISE ROW
BISBEE, ARIZONA
PHASE I ENVIRONMENTAL SITE ASSESSMENT
COCHISE COUNTY, ARIZONA

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LIST OF ACRONYMS

Acronym	Definition
ACIDS	Arizona CERCLA Information and Data Systems
AIRS	Aerometric Information Retrieval System
APP	Aquifer Protection Permits
Aquifer	Waste Water Treatment Facilities
AST	Aboveground Storage Tanks
ASTM	American Society of Testing and Materials
AUL	DEUR Database
AZ	Arizona
AZ Airs	Arizona Airs Database
AZ Spills	Hazardous Material Logbook
BCRLF	Brownfields Cleanup Revolving Loan Fund
Brownfields	Brownfields Tracking System
CAR	Cooperative Agreement Recipients
C-DOCKET	Criminal Docket System used to track criminal enforcement actions for all environmental statutes
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP	CERCLIS No Further Remedial Action Planned
CESQG	Conditionally Exempt Small Quantity Generators
Coal Gas	Former Manufactured Gas
CONSENT	Superfund Consent Decrees
CORRACTS	Corrective Action Report
Delisted NPL	National Priority List Deletion
DEUR	Declaration of Environmental Use Restriction
DOCKET	Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes
DOD	Department of Defense Sites
Dry Cleaners	Drycleaner Facility Listing
Dry Wells	Drywell Registration
EDR	Environmental Data Resources, Inc.
EPIC	Environmental Photographic Interpretation Center
ERNS	Emergency Response Notification System
EPCRA	Emergency Planning and Community Right-to-Know Act
ESA	Environmental Site Assessment
FIFRA	Federal Insecticide, Fungicide and Rodenticide Act
FINDS	Facility Index System/Facility Identification Initiative Program Summary Report
FFIS	Federal Facilities Information System
FURS	Federal Underground Injection Control
FTTS INSP	Federal Insecticide, Fungicide, and Rodenticide Act/Toxic Substance Control Act Tracking System
FUDS	Formerly Used Defense sites

List of Acronyms (*continued*).

Acronym	Definition
HAZWOPER	Hazardous Waste Operations and Emergency Response Standard
Harris Environmental	Harris Environmental Group, Inc.
HMIRS	Hazardous Materials Information Reporting System
Indian LUST	Leaking Underground Storage Tanks on Indian Land
Indian Reserv	Indian Reservations
Indian UST	Underground Storage Tanks on Indian Land
kg	Kilogram
LQG	Large Quantity Generators
LUST	Leaking Underground Storage Tanks
MLTS	Material Licensing Tracking System
MINES	Mines Master Index File
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NCSS	National Cooperative Soil Survey
NFRAP	No Further Remedial Action Planned
NGVD	National Geodetic Vertical Datum
NPDES	National Pollution Discharge Elimination System
NPL	National Priority List
NPL Liens	Federal Superfund Liens
NR	Not Requested at this Search Distance
NRC	Nuclear Regulatory Commission
ODI	Open Dump Inventory
OSHA	Occupational Safety and health Administration
PADS	PCB Activity Database System
PCB	Polychlorinated Biphenyls
PCS	Permit Compliance System
PISA	Preliminary Initial Site Assessment
RAATS	RCRA Administrative Action Tracking System
RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Information System
ROD	Records of Decision
SARA	Superfund Amendments and Reauthorization Act
SCS	Soil Conservation Service
SHWS	State Hazardous Waste
SPILLS	Hazardous Material Logbook
SPL	Superfund Program List
SPS	Superfund Program Section
SQG	Small Quantity Generator
SSURGO	Soil Survey Geographic Database
SSTS	Section 7 Tracking System
STATSGO	State Soil Geographic Database
STATE	State Environmental Laws and Statutes
SWF/LF	Directory of Solid Waste Facilities
SWTIRE	Solid Waste Tire Facilities
TBA	Targeted and Brownfields Properties

List of Acronyms (*continued*).

Acronym	Definition
TP	Target Property
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
TSD	Treatment, Storage, and/or Disposal
TSDF	Treatment, Storage, and/or Disposal Facility
TUSD	Tucson Unified School District
UMTRA	Uranium Mill Tailings Sites
US Brownfields	Listing of Brownfields Sites
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
US ENG CONTROLS	Engineering Controls Sites List
US INST CONTROL	Sites with Institutional Controls
UST	Underground Storage Tanks
VCP	Voluntary Remediation Program
VEMUR	Voluntary Environmental Mitigation Use Restriction
WPCF	Water Pollution Control Facilities
WQARF	Water Quality Assurance Revolving Fund
WWFAC	Waste Water Treatment Facilities
WWTF	Wastewater Treatment Facilities



1.0 INTRODUCTION

John McGlasson contracted with Harris Environmental to conduct a Phase I ESA of a property located at 1 Cochise Row in Bisbee, Arizona. The property lies within the northeast ¼ of Section 22, Township 23 South, Range 24 East, Gila & Salt River Meridian, Cochise County, Arizona. The property consists of approximately seven acres of industrial property with an abandoned 50,000 square foot building.

1.1 Purpose

The purpose of this Phase I ESA was to identify *Recognized Environmental Conditions* associated with the current and historic usage of the property and adjoining properties, nearby off-site sources of potential impact, and the potential environmental impact on the property from surrounding conditions or activities. Harris Environmental performed this Phase I ESA to help satisfy requirements to qualify for the innocent landowner defense described in CERCLA: i.e., the practices that constitute “all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice” as defined in 42 USC 9601(35)(B). This Phase I ESA is not a comprehensive evaluation of business risks nor is it an environmental compliance audit.

The term *Recognized Environmental Conditions* as defined by the ASTM means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of a property. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment, and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not *Recognized Environmental Conditions*.

1.2 Limitations and Exceptions of this Phase I ESA

This report is an instrument of service prepared by Harris Environmental for the exclusive use of John McGlasson. In order to create a report on which John McGlasson could rely, Harris Environmental worked closely with John McGlasson in the development of a scope of services.

The opinions relative to hazardous substances and petroleum products given in this report are based on information derived from the most recent site reconnaissance and from other activities described herein. The most recent site reconnaissance was performed on 19 May 2005. John McGlasson is advised that the conditions observed by Harris Environmental are subject to change. It is possible that certain indicators of the presence of hazardous substances and petroleum products may have been latent at the time of the most recent site reconnaissance and may subsequently have become observable. Therefore, the formulation of Harris Environmental’s findings and opinions is based solely on the information available.

A Phase I ESA is a service whose basic elements are determined by the standard of care prevailing at the time the service was rendered in the area where it was rendered. Because standards of care can be identified only through retrospective inquiry, Harris Environmental has



assumed that the standard of care is the ASTM Standard E1527-00. By definition, such standards set forth are minimum requirements.

Problems have arisen in the past because people and organizations have assumed, improperly, that they could rely on a Phase I ESA report developed for another party. John McGlasson is the only intended beneficiary of this report. Mr. McGlasson is the party to which Harris Environmental has explained the risks involved and which has been involved in the shaping of the scope of services needed to manage those risks satisfactorily. Improper management of risks may result in reliance on assumptions whose extent and nature would distort the meaning and impact of the findings and opinions related herein. Reliance on this report would in turn result in misinterpretation of these findings and opinions, and in potentially unwise actions based on those misinterpretations.

1.3 Special Terms, Limiting Conditions, and Methodology Used

A Cost Estimate to perform the Phase I ESA, dated 17 May 2005, was signed by Harris Environmental and John McGlasson. A copy of the Cost Estimate is provided in Appendix A. In accordance with the Scope of Services and Responsibilities of John McGlasson, as described in Section 5 of ASTM E1527-00, John McGlasson furnished the following information:

- Peter Koehler is identified as the owner of the property;
- Harris Environmental was not made aware of any specialized knowledge John McGlasson had regarding *Recognized Environmental Conditions* in connection with the property;
- John McGlasson provided Harris Environmental with the location of the property to be assessed; and
- John McGlasson provided Harris Environmental with the property address for the property.

This ESA has been performed in conformance with ASTM E1527-00, “Standard Practice Environmental Site Assessments: Phase I Environmental Site Assessment Process.” The elements of the study performed by Harris Environmental are as follows:

- Conducted a visual site survey of the property including walking the property and identifying evidence of past and present potential environmental conditions;
- Contacted EDR for State and Federal agency records of hazardous material, hazardous waste, landfill locations, and areas of environmental concern at the properties or at adjacent properties. The search included the following records: NPL, CERCLIS, RCRIS, RAATS, ERNS, PADS, State Registered USTs and LUSTs, and Hazardous Waste Sites;
- Reviewed the USGS 7.5 minute topographic map to identify uses of the property and to reveal the physical characteristics of the property;
- Obtained questionnaire from Peter Koehler, current property owner, for information regarding uses of the property and potential environmental conditions associated with the property; and



- Prepared this report documenting the investigation procedures followed, the results of the findings, and submitted this report to John McGlasson.

2.0 SITE DESCRIPTION

2.1 Location and Legal Description

The property under consideration consists of approximately seven acres of industrial property in the northeast ¼ of Section 22, Township 23 South, Range 24 East, Gila & Salt River Meridian, Cochise County, Arizona. The site is located near the intersection of Cochise Row and Congdon Avenue. The site is bound by a mix of residential and commercial land to the northeast, east, and southeast and undeveloped land to the southwest, west, and northwest. Commercial and residential buildings are present in the vicinity. Additionally, Queen Mine is located northwest of the property. Peter Koehler is indicated as the current legal title holder of the property.

John McGlasson provided Harris Environmental with the following property address located near Bisbee, Cochise County, State of Arizona: 1 Cochise Row. The parcel numbers for the property are 611-05-143B and 611-05-143C.

A copy of the property address is indicated on the Cost Estimate provided in Appendix A.

2.2 Site and Vicinity General Characteristics

The property has one 50,000 square-foot building. Inside, the building is segmented into various rooms with apparent old offices along the north and south ends of the building and large open warehouse space in the middle. The site is bounded by a mix of residential and commercial land to the northeast, east, and southeast. The site is bounded by undeveloped land to the southwest, west, and northwest. Commercial and residential buildings are present in the vicinity. Additionally, the Queen Mine is located in the vicinity northwest of the property.

John McGlasson indicated that, to his knowledge, the building was previously used as the site of a plastic manufacturing company.

2.3 Description of Structures, Roads, Other Improvements on the Property

The property lies near the intersection of Cochise Row and Congdon Avenue. Fencing is present on the property approximately 15 feet from the building perimeter on the south, west, and north sides of the building. The fencing on the east side of the property borders the parking lot and has a double gate used for vehicle access. A large gravel parking lot exists along the east side of the building with additional shipping and receiving parking at various spots along the northeast and west sides of the building. Native vegetation covers the ground around the building. Piles of broken drywall and concrete are present near the southeast end of the building.

2.4 Current Uses of the Property

The property is currently abandoned. Nothing is currently stored in the building. Strong skunk odors were observed during the site reconnaissance. These observations, along with comments from personnel at Bisbee Realty, indicate that skunks might inhabit the building.



2.5 Past Uses of the Property

Peter Koehler, the current property owner, indicated that the property was used as a warehouse and assembly plant for automotive light products from 1989 to 1997, and a warehouse of draperies and mini-blinds (Levelor, Inc.) from 1997 to 2003.

John McGlasson indicated that the building was previously used as the site of a plastic manufacturing company. John McGlasson additionally commented that, to his knowledge, the building was built in 1964. During phone conversations with Mr. McGlasson on May 17, 2005, Mr. McGlasson commented that he believes the building was a Phelps-Dodge mercantile warehouse prior to Mr. Koehler purchasing the building.

2.6 Current and Past Uses of the Adjoining Properties

A mix of residential and commercial land adjoins to the northeast, east, and southeast. Undeveloped land adjoins to the southwest, west, and northwest. Commercial and residential buildings are present in the vicinity. Additionally, the Queen Mine is located in the vicinity northwest of the property.

Review of an aerial photograph indicates that adjoining properties appear not to have changed since 2002. Aerial photography is provided in Appendix B.

3.0 RECORDS REVIEW

Harris Environmental obtained and reviewed environmental and physical setting records and historic information in an effort to identify *Recognized Environmental Conditions* in connection with the property. The following subsections are a narrative description of the records Harris Environmental obtained and reviewed. Where applicable, the approximate search distance is given.

3.1 Physical Setting Sources

The USDA SCS leads the National NCSS and is responsible for collecting, storing, maintaining, and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is representative of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed SSURGO soil survey maps. The following information is based on SCS STATSGO data.

Soil Component Name:	Chiricahua.
Soil Surface Texture:	Gravelly - loam.
Hydrologic Group:	Class D – Very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.
Soil Drainage Class:	Well Drained. Soils have intermediate water holding capacity. Depth to water table is more than 6 feet.
Hydric Status:	Soil does not meet the requirements for a hydric soil.



Corrosion Potential: Moderate.

Depth to Bedrock Min: >20 inches.

Depth to Bedrock Max: >30 inches.

3.2 Standard Environmental Record Sources

EDR provided an ASTM Radius Report containing USEPA and State database information in accordance with the ASTM search distances. The ASTM-required search radius was adjusted to accommodate the size of the property and to eliminate a possible margin of error in identifying the center of the property. EDR's Radius Report lists the federal and state databases searched, a description of the databases and the most recent release date of each database. The appended report also shows EPA- and State-regulated sites within the search area and other regulated sites that could be in the search area, but were unplotable due to insufficient address or other locator information. These unplotable sites are called "Orphan Sites" in this report. The EDR Radius Report is available upon request.

EDR included the following 21 ASTM-standard databases in its search of environmental records (Table 3.1).

Table 3.1. ASTM Standard Database Search Distances.

Database Name	Distance (miles)	# of Sites Found
Federal ASTM Standard		
NPL	1.000	0
Proposed NPL	1.000	0
CERCLIS	0.500	0
CERC-NFRAP	0.250	0
CORRACTS	1.000	0
RCRIS-TSD	0.500	0
RCRIS-LQG	0.250	0
RCRIS-SQG	0.250	1
ERNS	TP*	0
State ASTM Standard		
SPL	1.000	0
SHWS	1.000	0
SWF/LF	0.500	0
LUST	0.500	5
UST	0.250	3
AZ WQARF	1.000	0
Indian UST	0.250	0
Indian LUST	0.500	0
SWTIRE	0.500	0
VCP	0.500	0



3.2.1 Federal Standard Environmental Record Sources

NPL

The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices. No NPL sites were identified on or within a 1.000-mile radius of the property.

Proposed NPL

No Proposed NPL sites were identified on or within a 1.000-mile radius of the property.

CERCLIS

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the CERCLA. CERCLIS contains sites which are either proposed to or on the NPL and sites which are in the screening and assessment phase for possible inclusion on the NPL. No CERCLIS sites were identified on or within a 0.500-mile radius of the property.

CERC-NFRAP

As of February 1995, CERCLIS sites designated NFRAP have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. The USEPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so the USEPA does not needlessly repeat the investigations in the future. This policy change is part of the USEPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites. No CERC-NFRAP sites were found on or within a 0.250-mile radius of the property.

CORRACTS

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity. No CORRACTS sites were found on or within a 1.000-mile radius of the property.

RCRIS-TSD

RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by RCRA. CESQGs generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. TSDs treat, store, or dispose of the waste. No RCRIS-TSD sites were found on or within a 0.500-mile radius of the property.

RCRIS-LQG

LQGs generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. No RCRIS-LQG sites were found on or within a 0.250-mile radius of the property.



RCRIS-SQG

SQGs generate between 100 kg and 1,000 kg of hazardous waste per month. One RCRIS-SQG site was found at higher elevation within a 0.250-mile radius of the property. The site is identified as Blazer International. One violation exists for the site. The site obtained compliance on December 17, 1998. No environmental concerns are foreseen in relation to the property.

ERNS

ERNS records and stores information on reported releases of oil and hazardous substances. No ERNS sites were found on the property.

3.2.2 State Standard Environmental Record Sources

SPL

The SPL is representative of the sites and potential sites within the jurisdiction of the Superfund Program Section. It is comprised of the following elements: 1) WQARF Registry Sites; 2) Potential WQARF Registry sites; 3) NPL sites; and 4) DOD sites requiring SPS oversight. No SPL sites were found on or within a 1.000-mile radius of the property.

SHWS

The ACIDS list consists of more than 750 locations subject to investigation under the State WQARF and Federal CERCLA programs. The list is no longer updated by the state. One SHWS site was found at a slightly higher elevation within a 1.000-mile radius of the property. The site is identified as Kleindale Industrial Park. Minimal information was provided regarding the site. No environmental concerns are foreseen in relation to the property.

SWF/LF

SWF/LF records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites. No SWF/LF sites were found on or within a 0.500-mile radius of the property.

LUST

LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state. Five LUST sites were found on or within a 0.500-mile radius of the property.

The first site is identified as owned by Southern Arizona District and is located at a higher elevation within a 0.500-mile radius of the property. Two tanks are listed. Both tanks are closed. Closure date of the tank is not reported. No further information is provided. No environmental concerns are foreseen in relation to the property.

The second site is identified as owned by Bisbee Fire Station #2 and is located at a higher elevation within a 0.500-mile radius of the property. Three tanks are listed. Notification of the leak was obtained on September 20, 1996. The tanks were closed on November 1, 1996. No environmental concerns are foreseen in relation to the property.

The third site is identified as owned by Warren Union Service Station and is located at a higher elevation within a 0.500-mile radius of the property. Three tanks are listed. Notification of the



leak was obtained on December 4, 1992. The tanks were closed on February 3, 1995. No environmental concerns are foreseen in relation to the property.

The fourth site is identified as owned by Warren Auto Service and is located at a lower elevation within a 0.500-mile radius of the property. Three tanks are listed. All tanks are closed. Closure date of the tanks is not reported. No further information is provided. No environmental concerns are foreseen in relation to the property.

The fifth site is identified as owned by the City of Bisbee and is located at a lower elevation within a 0.500-mile radius of the property. One tank is listed. Notification of the leak was obtained on December 20, 1990. The tank was closed on June 27, 1994. No environmental concerns are foreseen in relation to the property.

UST

USTs are regulated under Subtitle I of RCRA and must be registered with the state department responsible for administering the UST program. Available information varies by state program. Three UST sites were found on or within a 0.2500-mile radius of the property.

The first site is identified as owned by Southern Arizona District and is located at a higher elevation within a 0.500-mile radius of the property. Two tanks are listed. The tanks were installed on February 26, 1984. Both tanks are closed. Closure date of the tank is not reported. No environmental concerns are foreseen in relation to the property.

The second site is identified as owned by Bisbee Fire Station #2 and is located at a higher elevation within a 0.500-mile radius of the property. One tank is listed. The tank was installed on December 5, 1976. The tank was closed on November 1, 1996. No environmental concerns are foreseen in relation to the property.

The third site is identified as owned by Warren Union Service Station and is located at a higher elevation within a 0.500-mile radius of the property. Three tanks are listed. Tank one was installed on January 1, 1979. Tanks two and three were installed on January 1, 1932. The tanks were closed on February 3, 1995. No environmental concerns are foreseen in relation to the property.

AZ WQARF

AZ WQARF sites are those which may have an actual or potential impact upon the waters of the state caused by hazardous substances. The WQARF program provides matching funds to political subdivisions and other state agencies for clean-up activities. No AZ WQARF sites were found on or within a 1.000-mile radius of the property.

Indian UST

No Indian UST sites were found on or within a 0.250-mile radius of the property.

Indian LUST

No Indian LUST sites were found on or within a 0.500-mile radius of the property.

SWTIRE

A waste tire "facility" means a solid waste facility at which waste tires are stored outdoors on any day. No SWTIRE sites were found on or within a 0.500-mile radius of the property.



VCP

The VCP database lists sites involved in the Voluntary Remediation Program. No VCP sites were found on or within a 0.500-mile radius of the property.

3.3 Additional Environmental Record Sources

Table 3.2. ASTM Additional Database Search Distances.

Database Name	Distance (miles)	# of Sites Found
Federal ASTM Supplemental		
CERCLA CONSENT	1.000	0
ROD	1.000	0
Delisted NPL	1.000	0
FINDS	TP	0
HMIRS	TP	0
MLTS	TP	0
MINES	0.250	0
NPL Liens	TP	0
PADS	TP	0
Indian Reserv	1.000	0
UMTRA	0.500	0
US ENG CONTROLS	0.500	0
ODI	0.500	0
FUDS	1.000	0
DOD	1.000	0
RAATS	TP	0
TRIS	TP	0
TSCA	TP	0
SSTS	TP	0
FTTS INSP	TP	0
State or Local ASTM Supplemental		
AST	TP	0
AZ Spills	TP	0
AZ DOD	0.500	0
WWFAC	0.500	0
Aquifer	TP	0
Dry Cleaners	0.250	0
Dry Wells	TP	0
AZ Airs	TP	0
EDR Proprietary Historical Databases		
Coal Gas Sites	1.000	0
Brownfields Databases		
US Brownfields	0.500	0
US Inst Control	0.500	0



DEUR AUL	0.500	0
Brownfields Tracking System	0.500	0
VCP	0.500	0

3.3.1 Federal Additional Environmental Record Sources

CERCLA CONSENT

CERCLA Consents are major legal settlements that establish responsibility and standards for cleanup at NPL sites. They are released periodically by United States District Courts after settlement by parties to litigation matters. No CONSENT sites were found on or within a 1.000-mile radius of the property.

ROD

ROD documents mandate a permanent remedy at an NPL (Superfund) site and contain technical and health information to aid in the cleanup. No ROD sites were found on or within a 1.000-mile radius of the property.

Delisted NPL

The NCP establishes the criteria that the USEPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate. No Delisted NPL sites were found on or within a 1.000-mile radius of the property.

FINDS

FINDS contain both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS, AIRS, DOCKET, FURS, C-DOCKET, FFIS, STATE, and PADS. No FINDS sites were found on the property.

HMIRS

HMIRS contains hazardous material spill incidents reported to DOT. No HMIRS sites were found on the property.

MLTS

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis. No MLTS sites were found on the property.

MINES

MINES contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information. No MINES sites were found on or within a 0.250-mile radius of the property.

NPL Liens

Under the authority granted the USEPA by CERCLA, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens. No NPL Liens sites were found on the property.



PADS

PADS identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities. No PADS sites were found on the property.

Indian Reservations (Indian Reserv)

The Indian Reserv map layer portrays Indian-administered lands of the United States that have any area equal to or greater than 640 acres. No Indian Reserv sites were found on or within a 1.000-mile radius of the property.

UMTRA

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remained after uranium had been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low. However, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized. In 1978, 24 inactive uranium mill tailings sites in Oregon, Idaho, Wyoming, Utah, Colorado, New Mexico, Texas, North Dakota, South Dakota, Pennsylvania, and on Navajo and Hopi tribal lands, were targeted for cleanup by the Department of Energy. No UMTRA sites were found on or within a 0.500-mile radius of the property.

US ENG CONTROLS

US ENG CONTROLS is a listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or affect human health. No US Eng Controls sites were found on or within a 0.500-mile radius of the property.

ODI

An ODI is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria. No ODI sites were found on or within a 0.500-mile radius of the property.

FUDS

The FUDS listing includes locations of FUDS properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions. No FUDS sites were found on or within a 1.000-mile radius of the property.

DOD Sites

This data set consists of federally owned or administered lands, administered by the DOD that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands. No DOD sites were found on or within a 1.000-mile radius of the property.

RAATS

RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the USEPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. The USEPA will retain a copy of the database for historical records. It was necessary to terminate



RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database. No RAATS sites were found on the property.

TRIS

TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313. No TRIS sites were found on the property.

TSCA

TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site. No TSCA sites were found on the property.

SSTS

Section 7 of FIFRA requires all registered pesticide-producing establishments to submit a report to the USEPA by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year. No SSTS sites were found on the property.

FTTS INSP

FTTS INSP tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA. To maintain currency, EDR contacts the Agency on a quarterly basis. No FTTS INSP sites were found on the property.

3.3.2 State Additional Environmental Record Sources

AST

This is a list of ASTs that the Department of Building and Fire Safety have permitted. No AST sites were found on the property.

AZ Spills

This is a list of chemical spills and incidents referred to the Emergency Response Unit. No AZ Spills sites were found on the property.

DOD Sites

These sites are federal facilities that are either being assessed for potential contamination or have active remediation taking place on them. No DOD sites were found on or within a 0.500-mile radius of the property.

WWFAC

This is a statewide list of wastewater treatment facilities. No WWFAC sites were found on or within a 0.500-mile radius of the property.

Aquifer

These are WWTF with APP. No Aquifer sites were found on the property.

Dry Cleaners

This is a listing of drycleaner facilities in Arizona. No Dry Cleaner sites were found on or within a 0.250-mile radius of the property.



Dry Wells

A dry well is a bored, drilled, or driven shaft or hole whose depth is greater than its width and is designed and constructed specifically for the disposal of storm water. No Dry Wells sites were found on the property.

AZ Airs

AZ Airs includes both major (has the potential to emit over 100 tons of criteria pollutant) and minor (below 100 tons) sources. No AZ Airs sites were found on the property.

3.3.3 EDR Proprietary Historical Databases

Coal Gas Sites

The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. The database details former manufactured gas (coal gas) sites. No Coal Gas Sites were found on or within a 1.000-mile radius of the property.

3.3.4 Brownfield Databases

US Brownfields

This consists of a list of Brownfields properties that includes Brownfields property addresses by CAR and Brownfields properties addressed by Targeted Brownfields Assessments. The USEPA's TBA program is designed to help states, tribes, and municipalities (especially those without USEPA Brownfields Assessment Demonstration Pilots) minimize the uncertainties of contamination often associated with Brownfields. Under the TBA program, the USEPA provides funding and/or technical assistance for environmental assessments at Brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under the USEPA's Brownfields Initiative to promote cleanup and redevelopment of Brownfields.

States, political subdivisions, territories, and Indian tribes become BCRLF cooperative agreement recipients when they enter into BCRLF cooperative agreements with the USEPA. The USEPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use USEPA funds provided through a BCRLF cooperative agreement for specified Brownfields-related cleanup activities. No US Brownfields Sites were found on or within a 0.500-mile radius of the property.

US Inst Control

This is a listing of sites with industrial controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls. No US Inst Control sites were found on or within a 0.500-mile radius of the property.

DEUR AUL

Activity and use limitations include both engineering controls and institutional controls. DEUR and VEMUR sites are restrictive land use covenants that are required when a property owner elects to use an institutional (i.e., administrative) control or engineering (i.e., physical) control as



a means to meet remediation goals. The DEUR runs with and burdens the land, and requires maintenance of any institutional or engineering controls.

VEMUR is a restrictive land use covenant that, prior to July 18, 2000, was required when a property owner elected to remediate the property to non-residential uses. Effective July 18, 2000, the DEUR replaced the VEMUR as a restrictive use covenant. No AUL sites were found on or within a 0.500-mile radius of the property.

Brownfields

The Brownfields database lists information relating to Brownfields sites in Arizona. No Brownfield sites were found on or within a 0.500-mile radius of the property.

VCP

The VCP database lists sites involved in the Voluntary Remediation Program. No VCP sites were found on or within a 1.000-mile radius of the property.

3.4 Historical Use Information on the Property

3.4.1 Summary of Past Uses of the Property

Harris Environmental obtained information from the site visit on 19 May 2005. Interviews and records were reviewed in order to identify 50 years of property use. Harris Environmental's review suggest that the previous uses of the property include a warehouse and assembly plant for automotive light products from 1989 to 1997, and a warehouse of draperies and mini-blinds (Levelor, Inc.) from 1997 to 2003. John McGlasson commented that to his knowledge the building was built in 1964. Prior to ownership by Peter Koehler, John McGlasson commented that he believes the building was a Phelps-Dodge mercantile warehouse.

3.4.2 Aerial Photographs

Harris Environmental obtained and reviewed an aerial photograph from 23 August 2002. Observations noted during the review are summarized in the paragraphs below.

Review of a 23 August 2002 aerial photograph of the property was obtained from Cooper Aerial. The aerial photograph identifies the same structures present on the property currently. Multiple semi trucks are identified on the aerial. However, the property is now abandoned and the trucks are no longer present on the property. Adjacent properties to the northeast, east and southeast are observed as mixed commercial and residential. The 2002 aerial photograph does not depict any changes to the property or adjacent properties. No other significant changes were identified in the aerial photograph.

The aerial photograph is provided in Appendix B.

3.4.3 Fire Insurance Maps

Fire Insurance Maps were not obtained for the property.

3.4.4 Zoning/Land Use Records

According to the Bisbee Planning and Zoning Department, the property is zoned as C-1, Commercial 1 Zone.



3.4.5 Fire Department Records

The Bisbee Fire Department was contacted regarding records of any fires, explosions, or spills on the property. Captain Kenny Delk indicated that no fires, explosions or spills have occurred at the property. Captain Delk indicated that there have been a few brush fires located outside of the fenced area on the property, but no fires within the fence or building on the property.

3.4.6 Recorded Land Title Records

A Commitment for Title Insurance was acquired by John McGlasson from Land America Title, Inc. for the property. According to the information provided, Peter Koehler Properties, LLC, and Illinois Limited Liability Corporation, are the current owners.

3.4.7 Historic Topographic Maps

Harris Environmental reviewed the Bisbee 1:24,000 topographic USGS map (dated 1978). This topographic map was obtained from the Arizona Regional Image Archive. Review of this topographic map does not identify any observable environmental concerns on or adjacent to the subject property. A portion of the topographic quadrangle showing the project area is present in Appendix C.

3.4.8 Local Street Directories

Local street directories were not obtained for the property.

4.0 SITE RECONNAISSANCE

4.1 Methodology and Limiting Conditions

A site reconnaissance was performed on the property and visible portions of adjoining properties to obtain information indicating the likelihood of identifying *Recognized Environmental Conditions* in connection with the property. Harris Environmental performed the site reconnaissance on 19 May 2005. A photographic inventory of the site reconnaissance is provided in Appendix D.

4.2 General Site Setting

4.2.1 Current Use of the Property and Adjoining Properties

The property has one 50,000-square-foot building. Inside, the building is segmented into various rooms with apparent old offices along the north and south ends of the building and large open warehouse space in the middle. The Queen Mine is visible northwest of the property. Residential and commercial buildings are scattered throughout the vicinity.

4.2.2 Current Property Zoning

The current zoning for the property is C-1, Commercial 1 Zone per Bisbee Planning and Zoning Department.

4.2.3 Property Topography

The topographic map shows the property lying at about 4984 feet NGVD with a general east-northeast topographic gradient.



4.2.4 Property Geology and Hydrology

The rock stratigraphic unit for the property is as follows:

Era: Paleozoic
System: Pennsylvanian
Series: Upper Paleozoic
Geologic Age Identification: Stratified Sequence

4.3 Questions About Helpful Documents

Harris Environmental asked John McGlasson if he was aware of any existing environmental documents or reports that have been prepared for the property. Mr. McGlasson stated that a previous Phase I Environmental Site Assessment was conducted by the current owner of the property in 1996.

4.4 Hazardous Substance and Petroleum Product Container Use

During the site reconnaissance, an attempt was made to identify hazardous substance and petroleum product containers on the property. No containers were located on the property.

4.5 Storage Tanks

Harris Environmental looked for indications of the presence of aboveground storage tanks and underground storage tanks during the site reconnaissance. The following sections provide details for relevant findings.

4.5.1 AST

No ASTs were located on the property.

4.5.2 UST

No evidence of USTs on the property was evident during the site reconnaissance.

4.6 Odors

Strong, pungent, or noxious odors were searched for on the property during the site reconnaissance. Strong skunk odors were observed during the site reconnaissance. These observations, along with comments from personnel at Bisbee Realty, indicate that skunks might inhabit the building.

4.7 Pools of Liquid

No standing surface water was identified on the property during the site reconnaissance.

4.8 Drums

Drums (containers of 5 to 55-gallon capacity) were searched for on the property during the site reconnaissance. No drums were seen on the property during the site reconnaissance. However, John McGlasson and Bisbee Realty say that approximately five half-buried 55-gallon drums are



present along the north side of the building. Bisbee Realty indicated that they believe the buried drums were used to catch rain water running off of the double-pitched roof. This method is supposedly used to prevent soil erosion and gulying of soil along the foundation of the buildings. Pictures of the buried drums obtained from Bisbee Realty are located in Appendix D.

4.9 Unidentified Substance Containers

An attempt was made to find open or damaged containers containing unidentified products suspected of being hazardous substances or petroleum products. No such containers were located on the property.

4.10 PCBs

Electrical transformers likely containing PCBs were searched for on the property. Two transformers were located, one in the building and one near the north end of the building. Both transformers were labeled "Non-PCB." Pictures of the transformers are provided in Appendix D. No environmental concerns are foreseen in relation to the transformers.

4.11 Exterior Observations

4.11.1 Pits, Ponds, or Lagoons

No pits, ponds, or lagoons were identified on the property during the site reconnaissance.

4.11.2 Stained Soil or Pavement

An attempt was made to identify areas of stained soil or pavement during the site reconnaissance of the property. Various areas of stained pavement were located in the building. The stains did not appear to be oil or petroleum-based, rather spilled paint or rust. Large areas of stained soil were observed outside along the north and east sides of the building. Vegetation surrounded these areas but was not present near the stained soil. Due to the nature of previous uses of the property, it is possible that the stained soil may be from trucks entering or being stored near shipping and receiving areas of the building. However, it is also possible that the soil may not actually be stained, and the dark color may be the result of something settling out in the area. Pictures of stained pavement and soil are provided in Appendix D. The presence of stained soil may indicate contamination. Christopher Flagler, business owner of the adjacent property, stated that previous soil sampling conducted in the area, but not on the property, indicated that contaminant levels do not exceed levels for commercial use. If the property is ever proposed for residential use, Harris Environmental recommends soil sampling in the areas of stained soil and pavement. Although this does not appear to pose an immediate environmental concern, if, during excavation, subsurface conditions are observed to be unnatural, such as odors or discoloration, excavation activities should cease and desist immediately and proper professionals should be contacted for further evaluations.

4.11.3 Stressed Vegetation

Areas of stressed vegetation (from causes other than insufficient water) were searched for during the site reconnaissance of the property. Various areas of stressed vegetation were located along the north and east sides of the building. Stained soil was found near the stressed vegetation. Pictures of stressed vegetation are provided in Appendix D. The presence of stressed vegetation



may indicate contamination. Christopher Flagler, business owner of adjacent property, stated that previous soil sampling conducted in the area indicated that contaminant levels do not exceed levels for commercial use. The levels of contamination would suffice for a commercial operation, but not for a residential use. If the property is ever proposed for residential use, Harris Environmental recommends soil sampling in the areas of stressed vegetation. Although this does not appear to pose an immediate environmental concern, if, during excavation, subsurface conditions are observed to be unnatural, such as odors or discoloration, excavation activities should cease and desist immediately and proper professionals should be contacted for further evaluations.

4.11.4 Solid Waste

Areas on the property that are apparently filled or graded by non-natural causes (or filled by fill of unknown origin) suggesting trash or other solid waste disposal were searched for on the property. Piles of broken drywall and concrete are present near the southeast end of the building. Pictures of the drywall and concrete are provided in Appendix D. No environmental concerns are foreseen in relation to the trash.

4.11.5 Wastewater

An attempt was made to look for wastewater or other liquid (including storm water) or any discharge into a drain, ditch, or stream on or adjacent to the property during the site reconnaissance. No discharges into a drain, ditch or stream were identified on the property.

4.11.6 Wells

Dry wells, irrigation wells, injection wells, and potable wells were searched for on the property during the site reconnaissance. What appears to be a water well valve was located on the property. A picture of the valve is provided in Appendix D. No environmental concerns are foreseen in relation to the valve.

4.11.7 Septic System

On-site septic systems or cesspools were searched for on the property during the site reconnaissance. No on-site septic systems or cesspools of any kind were seen on the property.

4.12 Additional Observations

Old tile was located at various places throughout the building. The presence of asbestos is possible; however with cautious, proper removal of the tile, no environmental concerns are foreseen.

Insulation was located along the interior walls of the building. The presence of asbestos is possible; however with cautious, proper removal, no environmental concerns are foreseen.

Lead paint was observed in the building. Contamination is possible; however with cautious, proper removal, no environmental concerns are foreseen.



If, during the removal of these materials, subsurface conditions are observed to be unnatural, such as odors or discoloration, excavation activities should cease and desist immediately and proper professionals should be contacted for further evaluation.

5.0 QUESTIONNAIRES

Questionnaires were completed by the following in order to obtain information indicating *Recognized Environmental Conditions* in connection with the property:

- Peter Koehler, Property Owner. Questionnaire completed 19 May 24 2005.

Responses to the questionnaire with the foregoing person are summarized in the following sections.

5.1 Questionnaire Response by Peter Koehler, Property Owner

Peter Koehler, current property owner, completed a questionnaire regarding the property. Mr. Koehler indicated that the property was purchased by his company in 1988 and he personally acquired the property in 1996. Mr. Koehler indicated that, to his knowledge, the property has previously been used as a warehouse and assembly plant for automotive lighting products from 1989 to 1997 and then warehousing of draperies and mini-blinds (Levelor, Inc.). Mr. Koehler commented that an environmental study of the property was conducted in early 1996. He stated that the report stated no problems. Additionally, Mr. Koehler stated that he is unaware of any environmental concerns regarding the property.

6.0 FINDINGS

Harris Environmental found no *Recognized Environmental Conditions* or historical *Recognized Environmental Conditions* on the property.

7.0 CONCLUSIONS

Harris Environmental performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-00 for the property located within the northeast ¼ of Section 22, Township 23 South, Range 24 East, Gila & Salt River Meridian, Cochise County, Arizona.

This Phase I ESA has revealed no evidence of *Recognized Environmental Conditions* in connection with the property. Thus, no further investigation is warranted for acquisition of the property.

8.0 DEVIATIONS

Any exceptions to, or deletions from, this practice are described in Section 1.3 of this report.

9.0 ADDITIONAL SERVICES

No additional services were performed by Harris Environmental as part of this report that were not originally scoped in the agreement between Harris Environmental and John McGlasson.



10.0 REFERENCES

Cooper Aerial Survey Company. *Aerial Photographs*. 1692 W. Grant Road, Tucson, Arizona, 85745.

Environmental Data Resources, Inc. *Radius Map with GeoCheck Report*. 440 Wheelers Farms Road, Milford, Connecticut, 06460.

Arizona Regional Image Archive. Electronic document, <http://aria.arizona.edu>. Accessed 1 June 2005.



11.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONAL

Jill N. Clausen
Ecologist

Date



12.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL PARTICIPATING IN THE PHASE I ENVIRONMENTAL SITE ASSESSMENT

Jill N. Clausen

Experience

Ms. Clausen specializes in conducting Phase I ESAs and Native Plant Inventories and Plans for various local municipalities, developers, nonprofit organizations, and private landowners throughout southern Arizona as well as Kansas, Missouri, Oklahoma and Arkansas. She has completed the educational and practical requirements associated with the OSHA 40 Hour HAZWOPER certificate. She has performed Phase I ESAs ranging from individual residences to large commercial parcels of land. She also attends the Due Diligence at Dawn conference hosted by EDR. This annual conference updates professionals conducting Phase I ESAs with new regulations and new priority contaminants.

Education

B.S. Animal Ecology
Iowa State University
2002

Endangered Species Surveys

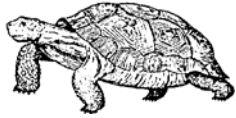
Cactus ferruginous pygmy-owl
Pima Pineapple Cactus

Compliance Documentation

Phase I ESAs
Riparian Habitat Delineations
Environmental Determinations
Biological Reviews
Native Plant Preservation Plans
Jurisdictional Waters of the U.S. Delineations
Section 401/404 and NPDES Permit Documentation



APPENDIX A – COST ESTIMATE



HARRIS ENVIRONMENTAL GROUP, INC.

58 EAST, 5TH STREET TUCSON, AZ 85705 (520) 628-7648 (520) 628-1458 FAX

17 May 2005

John McGlasson
2961 Industrial Road
Las Vegas, Nevada 89109

RE: Phase I ESA Proposal

Mr. McGlasson:

Thank you for the opportunity to provide you with a cost estimate for a Phase I Environmental Site Assessment. The work requires a review of approximately 7 acres and a 48,000 square foot building located at 1 Cochise Road, Bisbee, Arizona. Harris Environmental Group, Inc. (Harris Environmental) proposes to conduct this work for **\$1,650.00**.

The Phase I Environmental Site Assessment (ESA) shall review the history of previous site activities to identify conditions that may have introduced the presence of environmental concerns on or near the properties. We shall examine historic records of the area, conduct interviews as appropriate, and examine current and historic aerial photographs of the sites to evaluate past land use. We also will examine current lists compiled by the state regulatory agencies and the United States Environmental Protection Agency to determine if the site or adjacent properties have been investigated for inclusion into the Superfund Program or are known to be occupied by a business which generates, transports, treats, stores, or disposes of hazardous waste. Our work also includes a review of relevant records to identify reports of any hydrocarbon or hazardous materials spills, leaking underground storage tanks, or registered underground storage tanks.

The following procedures shall be used:

- Records Review – Review all records according to ASTM E1527-00 standards.
- Site Reconnaissance – Conduct site inspections of project area to determine environmental conditions.
- Interviews – Conduct local interviews if deemed necessary.
- Report Preparation - Prepare final report.

This site evaluation only recognizes environmental concerns and does not include any testing or remediation. If you would like further information, please contact me at 520.628.7648 or through email at fnarcaroti@heg-inc.com. If the terms are acceptable, please sign and date below to initiate work. We can begin work on the project immediately. We will require 13 business days to complete project from receipt of signed proposal. You may fax the contract back to us at 520.628.1458. Thank you for your interest in using Harris Environmental to conduct environmental services for your project. We look forward to working with your team.

Sincerely,

Fred Narcaroti
Business Development Manager

Bid Acceptance: _____

Signature, Title, and Date



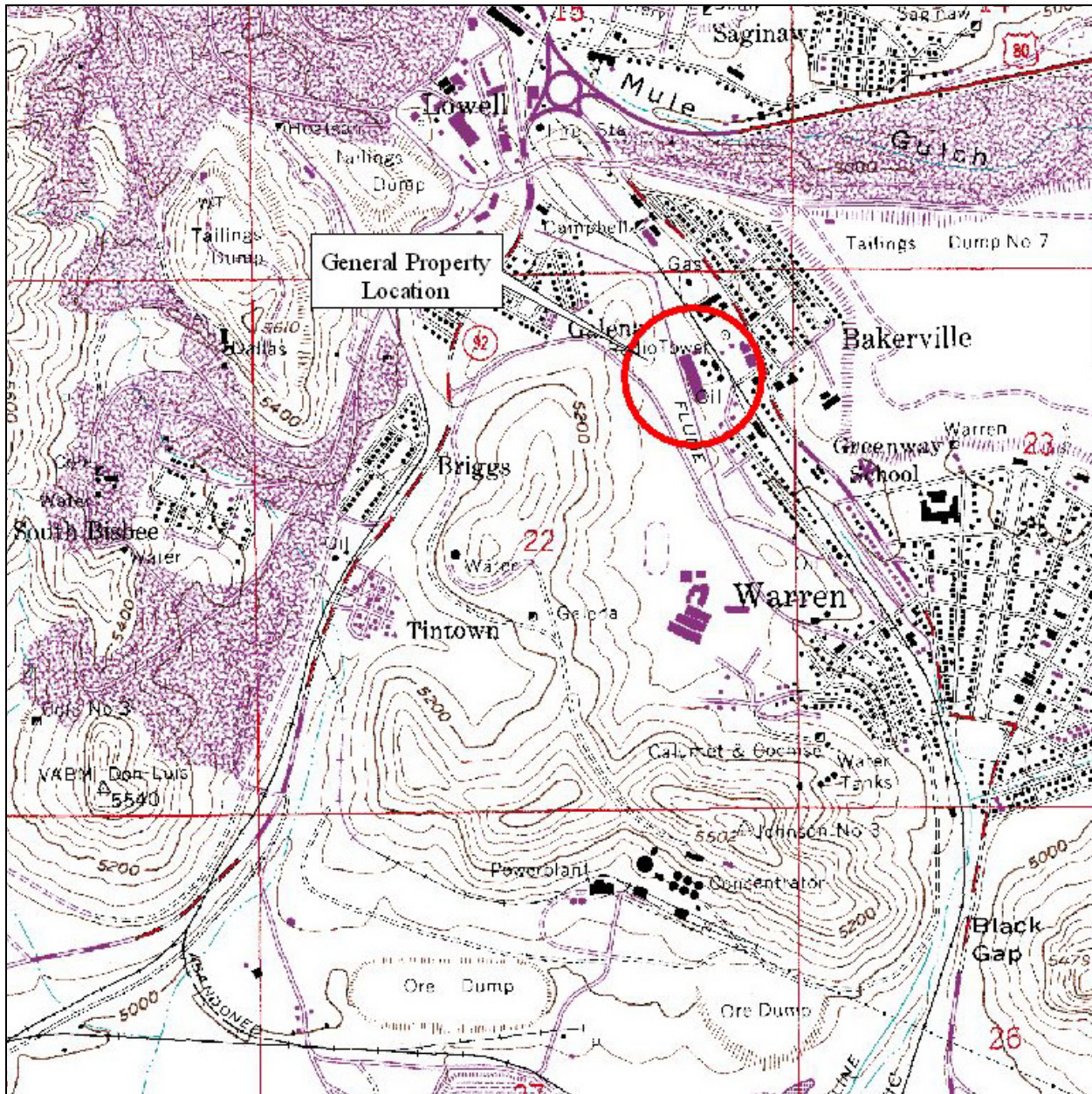
APPENDIX B – AERIAL PHOTOGRAPH



Photograph taken 23 August 2002, by Cooper Aerial.



APPENDIX C – USGS 7.5-MINUTE TOPOGRAPHIC MAP



Bisbee USGS 7.5-minute topographic quadrangle (date: 1978). Source: Arizona Regional Image Archive.



APPENDIX D – SITE RECONNAISSANCE PHOTOGRAPHS



Inside south end of building looking south.



Inside south end of building looking west.



Inside south end of building looking north.



Air circulating device hanging from ceiling in south end of building.



Air circulating device hanging from ceiling in south end of building.



Inside middle of building.



Looking out window of building, looking west.



Tile located in middle of building.



Insulation along west wall of building.



Tile located in middle of building.



Observed rust or copper debris on concrete in building.



Pump located in building with rust/copper debris surrounding on concrete.



Transformer located in north end of building – labeled “Non PCB.”



Outside along northwest side of building.



Outside along northwest side of building.



Valve located outside along west side of building.



Stained soil and sparse vegetation located near northwest end of building.



Stained soil and sparse vegetation located near northwest end of building.



Stained soil and sparse vegetation located near northwest end of building.



Buried 55-gallon drums (provided by Bisbee Realty).



Buried 55-gallon drums (provided by Bisbee Realty).



East side of building in parking lot – looking southeast.



Transformer located outside northeast end of building – labeled “Non PCB.”



Drywall and concrete debris located near the northeast end of building north of parking lot.



Drywall and concrete debris located near the northeast end of building north of parking lot.