

The insight you need. The independence you trust.

3321 Shenandoah Ave NW
3321 Shenandoah Avenue Northwest
Roanoke, Virginia 24017

BBG Project: 0524004112
Client Reference: WF-CWS-24-002110-0001-02E

Prepared For
Wells Fargo Bank N.A.
461 From Road, Floor 02, Suite 235
Paramus, New Jersey 07652

Report Date
May 22, 2024

Interviews: May 13, 2024
Government Records Review: May 2, 2024
Visual Inspection: May 13, 2024

Prepared By
BBG Assessments, LLC
Locations Nationwide

BBG Main Contact
Kristen Campos | kcampos@bbgres.com | 813.725.5021

Reliance Provisions

1. In connection with a proposed extension of credit in the form of (or a proposed investment in) a loan, debt issuance or other financing to be secured, in whole or in part, directly or indirectly, by the real property ("Property") which is the subject of this report ("Report"), or by pledges of direct or indirect ownership interests in the Property owner, or in the form of preferred equity ownership interests in the Property owner (in any such case, the "Financing"), or the proposed issuance of any securities secured or otherwise backed, in whole or in part, directly or indirectly by the Property or the Financing (the "Securities"), this Report, and the information contained therein, may be used and relied upon by the addressee(s) of this Report, their affiliates, successors and assigns, and

- (a) Wells Fargo Bank, N.A. ("Bank"), as Administrative Agent for the benefit of any lenders, from time to time, party to the Financing;
- (b) any actual or prospective purchaser of, or investor in, the Financing (or any portion thereof or interest therein by way of participation, syndication or otherwise);
- (c) any actual or prospective financing source for any such purchaser or investor;
- (d) any servicer of the Financing or the Securities;
- (e) any trustee of the Financing or the Securities;
- (f) any rating agency actually or prospectively rating the Financing or the Securities;
- (g) any underwriter of, or placement agent for, the Financing or the Securities;
- (h) any institutional provider of any liquidity facility or credit support for the Financing or the Securities;
- (i) the respective affiliates of each entity referenced in clauses (a)-(g) above;
- (j) the respective officers, directors, employees, agents, advisors, and counsel, acting in such capacity on behalf of any person or entity referenced in clauses (a)-(i) above; and
- (k) the respective successors and assigns of any person or entity referenced in clauses (a) through (i) above

Reliant Parties

With the exception of those individuals or entities having a direct or indirect ownership interest in the subject property, or in any entity that holds a direct or indirect ownership interest in the subject property, all other entities, public or private, who provide direct or indirect financial support to the subject property including but not limited to: (1) Federal, State, or Local Housing Finance Authorities; (2) Federal, State or Local Development Boards; (3) Issuers of Public or Private Bonds; (4) Federal, State, or Local Taxing Authorities, and Federal or State Tax Credit Limited Partnerships; may all rely on the contents and conclusions contained in this report.

This Report has no other purpose and should not be relied upon by any other person or entity.

2. This Report and its preparer may be referred to, and this Report may be included in whole or in part, summarized or quoted (provided any such partial inclusion, summary, or quote is not misleading), in any term sheet, offering circular, private placement memorandum, registration statement, prospectus or prospectus supplement relating to the Financing or the Securities (or any portion thereof) and the preparer of this Report agrees to cooperate reasonably in answering questions by any of the persons or entities referenced in clauses (a)-(j) above during the three (3) year period following the date of this Report.

3. This Report speaks only as of the date of this Report.

4. All the terms, conditions and provisions set forth in this Section entitled "Reliance Provisions", as well as those contained in the Limited Agreement and the applicable (Appraisal, Environmental, or Construction) General Requirements, all of which the preparer agreed to when accepting the award of the assignment to prepare the Report on the Banks Application system, shall control and supersede any contrary or inconsistent terms, conditions, or provisions otherwise set forth in this Report (collectively "Contrary Terms"), unless an authorized officer of the Bank expressly agrees in writing to such Contrary Terms and expressly states that such particular Contrary Terms "supersede the terms of the "Reliance Provisions" set forth in the General Requirements with which the preparer of the Report agreed to when accepting the award of the assignment to prepare the Report on the Banks Application system."

Limitations on Grant of Reliance on Report

5. The author of the subject report may not, without the prior written consent of Wells Fargo, which may be withheld in its sole and absolute discretion, grant reliance on the work product or conclusions contained within the subject report to any other person or entity.

In the event Wells Fargo should grant any such consent, and while not a party to any agreement entered into with regard to reliance upon the subject report ("**Reliance Agreement**"):

- A. Wells Fargo, in its sole discretion, reserves the right to the review and approval of the form and content of any such Reliance Agreement entered into;
- B. The granting of such consent will in no way alter or diminish the underlying content or conclusions of the subject report or of the associated reliance granted within the subject report;
- C. The subject report remains a self-contained standalone report;
- D. Any Reliance Agreement must:
 - (i) State that Wells Fargo is not a party to the Reliance Agreement;
 - (ii) State that the subject report contents and conclusions cannot be altered in any way;
 - (iii) State that Wells Fargo does not warrant, promise, or guaranty the completeness, accuracy, or veracity of such report nor its suitability for any purpose and specifically, but not by way of limitation, Wells Fargo does not represent:
 - (a) that the assumptions, conclusions, or opinions expressed in the subject report are accurate, reasonable, or relevant for any purpose or that the subject report has been prepared in compliance with any applicable legal or regulatory requirements; or
 - (b) that the subject Report has been accepted or rejected by Wells Fargo or that Wells Fargo agrees or disagrees with any conclusions or opinions expressed in such report;
 - (iv) State that Wells Fargo shall have no responsibility for and is fully released from any claims, liabilities, costs, or damages arising out of or relating to any report deficiencies. and the parties use of or reliance on the subject report is strictly at their own risk; and

(v) State that each recipient of the subject report will hold the subject report in strictest confidence and, without Wells Fargo's prior written consent, will not deliver the subject report to any other person or entity (except its employees and agents), absent compulsion by law.

Certification Statement:

This report has been prepared by the staff of BBG for Wells Fargo Bank under the professional supervision of the principal and/or senior staff whose signatures appear hereon. Neither BBG, nor any staff member assigned to this investigation has any interest or contemplated interest, financial or otherwise, in the subject or surrounding properties, or in any entity which owns, leases, or occupies the subject or surrounding properties or which may be responsible for issues identified during the course of this investigation, and has no personal bias with respect to the parties involved.

The information contained in this report has received appropriate technical review and approval. The conclusions represent professional judgments founded upon the findings of the investigations identified in the report and the interpretation of such data based on our experience and expertise according to the existing standard of care. No other warranty or limitation exists, either express or implied.

Neither this report nor anything contained in this report shall be used or relied upon by anyone else without the express written consent of Wells Fargo. Wells Fargo makes no express or implied representation or warranty of any kind to anyone regarding this report and Wells Fargo expressly disclaims any liability of any kind to anyone with respect to this report.

Any opinions, assumptions or conclusions contained in this report are solely those of the consultant which prepared this report and not Wells Fargo.

Regarding the property seller and/or purchaser (choose one):

Our firm does not now have, nor has it ever had, any affiliation, nor have we ever done any work for the buyer or seller of the property to the best of our knowledge.

Our firm has had either an affiliation or done work for the buyer or seller as is described in the attached sheet.

This is certified as true and correct to the best of my (our) knowledge.

PROJECT SUMMARY TABLE

BBG has prepared this Phase I ESA of the property located at 3321 Shenandoah Avenue Northwest, Roanoke, Virginia (Subject Property) at the request of Wells Fargo Bank N.A.. The purpose of the ESA is to identify Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs) and Historical Recognized Environmental Conditions (HRECs) and de minimis conditions as defined by ASTM E1527-21.

Report Section	NFA	REC	CREC	HREC	de minimis	BER	Comment
6.2 Environmental Records Summary	✓						
7.13 Historical Use Summary		✓					Historical site use including storage of hazardous materials and petroleum products is a REC.
8.3 Visual Observations Summary		✓					The storage of various equipment and materials an observed staining in unpaved areas of the Subject Property is considered a REC. Floor drains within the building and an oil/water separator (OWS) is considered a REC.
9.1 Asbestos Containing Materials (ACM)						✓	Several bags labeled as asbestos are stored on the Subject Property.
9.2 Radon	✓						
9.3 Lead-Based Paint (LBP)	✓						
9.4 Drinking Water	✓						
9.5 Microbial Growth	✓						
9.6 Flood Zone and Wetlands	✓						

NFA - No Further Action

BER - Business Environmental Risk

May 22, 2024

Greg Doyle
Wells Fargo Bank N.A.
461 From Road, Floor 02, Suite 235
Paramus, New Jersey 07652

Re: Phase I Environmental Site Assessment of
3321 Shenandoah Ave NW
3321 Shenandoah Avenue Northwest
Roanoke, Virginia 24017
BBG Project: 0524004112
REVS #: WF-CWS-24-002110-0001-02E

Dear Mr. Doyle:

BBG Assessments, LLC (BBG) has completed a Phase I Environmental Site Assessment (ESA) of the above referenced property in accordance with the ASTM International (ASTM) E1527-21 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* and generally accepted industry standards, as well as Wells Fargo's Scope of Work.

This report was prepared solely for the use of Wells Fargo Bank N.A. (hereinafter referred to as "Client" or "User"). No other party shall have the right to rely on this report or the findings herein, without the prior written consent of Wells Fargo.

Please contact me at kcampos@bbgres.com or 813.725.5021 should you have any questions or require additional information. Thank you for the opportunity to be of service.

Sincerely,



Kristen Campos
Managing Director
BBG Assessments, LLC

TABLE OF CONTENTS

1.0	EXECUTIVE SUMMARY	1
1.1	Subject Property Description	1
1.2	Findings, Opinions and Conclusions	1
2.0	INTRODUCTION	4
2.1	Purpose	4
2.2	Scope of Work	5
2.3	Significant Assumptions	5
2.4	Limiting Conditions	5
2.5	Special Terms and Conditions	6
3.0	SUBJECT PROPERTY DESCRIPTION	7
3.1	Subject Property Details	7
3.2	Utility and Service Providers	7
3.3	Adjoining Properties	7
4.0	PHYSICAL SETTING	9
4.1	Topography	9
4.2	Surface Water Bodies	9
4.3	Geology and Hydrology	9
4.4	Minerals Exploration and Production	10
5.0	INTERVIEWS, RECORDS AND MUNICIPAL INFORMATION	11
5.1	User Provided Information	11
5.2	Owners, Operators and/or Neighboring Properties	12
5.3	Municipal/Government Agencies	13
6.0	ENVIRONMENTAL RECORDS	15
6.1	Environmental Records Sources	15
6.2	Environmental Records Summary	19
7.0	HISTORICAL USES	20

7.1 Aerial Photographs 20

7.2 Fire Insurance Maps 22

7.3 Property Tax Files 22

7.4 Recorded Land Title Records 22

7.5 Environmental Lien and Activity Use Limitations (AULs) 22

7.6 Historical USGS Topographic Maps 23

7.7 Local Street Directories 23

7.8 Building Department Records 26

7.9 Zoning/Land Use Records 26

7.10 Previous Assessment/Reports 26

7.11 Other Historical Sources 26

7.12 Data Failure 27

7.13 Historical Use Summary 27

8.0 PROPERTY RECONNAISSANCE AND INVESTIGATION 29

8.1 Methodology and Limiting Conditions 29

8.2 Visual Observations 29

8.3 Visual Observations Summary 32

9.0 ASTM NON-SCOPE CONSIDERATIONS 34

9.1 Asbestos Containing Materials (ACM) 34

9.2 Radon 34

9.3 Lead-Based Paint (LBP) 35

9.4 Drinking Water 35

9.5 Microbial Growth 35

9.6 Flood Zone and Wetlands 36

9.7 ASTM Non-Scope Consideration Summary 36

10.0 FINDINGS, OPINIONS, AND CONCLUSIONS 37

10.1 Findings, Opinions and Conclusions 37

11.0 DEVIATIONS AND ADDITIONAL SERVICES 39

12.0 DECLARATION OF ENVIRONMENTAL PROFESSIONAL 40

13.0 DETAILED SCOPE OF WORK 43

Appendix A Property Maps

Appendix B Photographs

Appendix C Supporting Documentation

Appendix D Regulatory Database Report

Appendix E Historical Documentation

Appendix F Personnel Qualifications

1.0 EXECUTIVE SUMMARY

1.1 Subject Property Description

The Subject Property consists of an irregular-shaped parcel of land totaling 7.41 acres improved with one single-story building comprising 14,252 square feet (NRA). The building, which was constructed in 1992, has masonry and metal siding exterior walls. Additional improvements include paved parking and driveway and landscaped areas. At the time of the assessment, the Subject Property was developed for use as a facility utilized by a large environmental contractor, LCM Corporation.

The Subject Property was developed with agricultural land from at least 1937 until the mid-1950s, when it was developed with a drive-in movie theater, which operated until the late 1980s. In 1992, the Subject Property was redeveloped with the current improvements. The Subject Property has been occupied by LCM Corporation from the early 1990s to present day.

A Subject Property Location Map, Subject Property Layout Map and photographs of the Subject Property are appended to this report.

1.2 Findings, Opinions and Conclusions

BBG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527 of 3321 Shenandoah Avenue Northwest, Roanoke, Virginia, the Subject Property. Any exceptions to, or deletions from, this practice are described in Section 11 of this report. This assessment has revealed no evidence of RECs/CRECs in connection with the Subject Property except for the following:

- The Subject Property has been occupied by LCM Corporation for approximately 30 years. This facility performs environmental services including after-hours response to petroleum and chemical incidents which results in the interim storage of asbestos and lead paint abatement materials and the storage of contaminated soils and drums on the Subject Property. Deficiencies in the storage of these materials including the prolonged storage of materials, storage of the materials outside the permitted areas and evidence of stained soils have been reported in documentation reported by the Virginia Department of Environmental Quality (VDEQ). Additionally, BBG observed various drums and containers of petroleum products, paint, and other hazardous materials stored in unpaved areas outside of the building. Additionally, various equipment and construction debris was observed throughout the exterior portions of the Subject Property, including but not limited to, empty polyethylene storage tanks, empty metal storage tanks, piping, metal debris, trucks, boats, gravel materials, and tires. BBG observed evidence of staining in the unpaved areas to the west of the building and on the cracked pavement on the north side of the building. Given the observed site conditions and the long term storage and handling of hazardous substances on the Subject Property (for approximately 30 years), BBG considers the long-term use, the storage of various drums, containers and miscellaneous equipment and materials in unpaved areas outside of the building and the observed staining of the Subject Property a REC.

- Several small floor drains were observed within the building. Additionally, a portion of the garage area was formerly used as a wash bay, however, BBG was unable to confirm the presence of a drain in this area due to the floor being covered with the storage of various items. BBG observed an apparent oil/water separator (OWS) beneath an enclosure to the west of the building. The OWS is reportedly connected to the municipal sewer system and has not been used for several years. No additional information regarding the drains or maintenance/service of the OWS was available. Given the storage, handling and generation of petroleum products and hazardous materials within the building, the absence of maintenance/service of the OWS, and the presumed age of the system (approximately 32 years), the OWS is considered a REC.

This assessment has revealed no evidence of de minimis conditions.

The assessment has revealed no evidence of HRECs in connection with the Subject Property.

No significant data gaps were identified that would affect the ability of the environmental professional to identify RECs at the Subject Property.

This assessment has revealed no evidence of BERs associated with the standard ASTM scope considerations.

This assessment has revealed no evidence of BERs relating to ASTM non-scope considerations except for the following:

- BBG observed several bags labeled as "Asbestos" stored within the building and in a dump truck on the northern portion of the Subject Property. Although the asbestos containing materials are contained within bags, the storage of ACM on the Subject Property is considered a BER.

Certification Statement:

This report has been prepared by the staff of BBG for Wells Fargo Bank under the professional supervision of the principal and/or senior staff whose signatures appear hereon. Neither BBG, nor any staff member assigned to this investigation has any interest or contemplated interest, financial or otherwise, in the subject or surrounding properties, or in any entity which owns, leases, or occupies the subject or surrounding properties or which may be responsible for issues identified during the course of this investigation, and has no personal bias with respect to the parties involved.

The information contained in this report has received appropriate technical review and approval. The conclusions represent professional judgments founded upon the findings of the investigations identified in the report and the interpretation of such data based on our experience and expertise according to the existing standard of care. No other warranty or limitation exists, either express or implied.

Neither this report nor anything contained in this report shall be used or relied upon by anyone else without the express written consent of Wells Fargo. Wells Fargo makes no express or implied representation or warranty of any kind to anyone regarding this report and Wells Fargo expressly disclaims any liability of any kind to anyone with respect to this report.

Any opinions, assumptions or conclusions contained in this report are solely those of the consultant which prepared this report and not Wells Fargo.

Regarding the property seller and/or purchaser (choose one):

Our firm does not now have, nor has it ever had, any affiliation, nor have we ever done any work for the buyer or seller of the property to the best of our knowledge.

Our firm has had either an affiliation or done work for the buyer or seller as is described in the attached sheet.

This is certified as true and correct to the best of my (our) knowledge.

2.0 INTRODUCTION

2.1 Purpose

The purpose of the ESA is to identify Recognized Environmental Conditions (RECs), Controlled Recognized Environmental Conditions (CRECs) and Historical Recognized Environmental Conditions (HRECs) and de minimis conditions as defined by ASTM E1527-21.

The term REC is defined as “(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment.”

“Likely is that which is neither certain nor proved but can be expected or believed based on the logic and experience of the environmental professional, available evidence, or both, as stated in the report to support the opinion given therein.”

The term CREC is defined as “a recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, activity and use limitations or other property use limitations).”

The term HREC is defined as “a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations).”

The term de minimis condition is defined as “a condition that generally does not present a threat to human 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 RECs or CRECs.”

The term Business Environmental Risk (BER) is defined as a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated as defined by ASTM.

The term data gap is defined as “a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice, including, but not limited to, site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.)”

2.2 Scope of Work

The ESA was conducted in accordance with ASTM E1527-21 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (Standard Practice), the scope of work provided by the Client, and generally accepted industry standards, and is designed to meet the United States Environmental Protection Agency (USEPA) Standards and Practices for All Appropriate Inquiries (AAI) pursuant to 40 Code of Federal Regulations (CFR) Part 312.

Additionally, BBG addressed certain ASTM non-scope considerations. These non-scope considerations include asbestos-containing materials (ACM), radon, lead-based paint (LBP), microbial growth, drinking water quality, flood zones, and wetlands.

A more detailed scope of work is provided in Section 13.

2.3 Significant Assumptions

- BBG assumes the Subject Property has been correctly identified by the User, designated representative of the User, property owner or operator, and/or the designated representative of the property owner or operator.
- BBG assumes that the User, designated representative of the User, property owner or operator, and/or the designated representative of the property owner or operator used good faith in answering questions about and providing information for the Subject Property.
- BBG assumes the direction of groundwater is consistent with the contours depicted on the United States Geological Survey (USGS) topographic map covering the Subject Property, unless otherwise specified by actual well data for the Subject Property or properties in the area, or BBG’s experience and knowledge of the area.

2.4 Limiting Conditions

- The scope of work completed was designed solely to meet the needs of BBG’s Client. BBG shall not be liable for any unintended usage of this report by another party. Additionally, based on the ASTM Standard Practice, the ESA is only valid if completed within 180 days of an acquisition or the transaction necessitating the ESA, unless updated in accordance with terms outlined within the Standard Practice.

- No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. This ESA was designed to reduce but not eliminate uncertainty regarding the existence of such conditions in a manner that recognizes reasonable limits of time and cost. BBG has completed this ESA in accordance with generally accepted consulting practices, and makes no other warranties, either expressed or implied, as to the character and nature of such services or product.
- An ESA is intended to be a non-intrusive investigation and generally does not include sampling or testing of air, soil, water, or building materials. No destructive testing was completed and concealed areas, such as behind walls or within machinery, were not accessed. Any testing, including that for ACM, LBP and radon, is designed solely to meet the needs of the Client, not to meet any local, state or federal regulations and should not be utilized as such. Any test results obtained are for the personal use of Client only and are not intended for submittal to any regulatory agency.
- Information needed to complete the ESA is based on personal interviews, government records, published resources, and various historical documents. Accuracy and completeness of information varies among information sources and is often inaccurate or incomplete. An environmental professional is not required by the ASTM Standard Practice to verify independently the information provided but may rely on information provided unless the environmental professional has actual knowledge that certain information is incorrect or unless it is obvious that certain information is incorrect based on other information obtained by or otherwise actually known to the environmental professional.
- BBG shall have no on-going obligation to obtain and include information that was not reasonably ascertainable, practically reviewable, or provided to BBG in a reasonable timeframe to formulate an opinion and complete the assessment by the agreed upon due date.
- An ESA includes some information that may be relevant to regulatory compliance, but is not intended and shall not be construed as a compliance audit and cannot be considered a verification of regulatory compliance. Depending on its past, present or future intended use, the property under review may or may not be subject to regulation and permitting under environmental and health and safety laws, such as, but not limited to, the Clean Air Act, the Clean Water Act, the Solid Waste Disposal Act, the Occupational Safety and Health Act, and other federal, state and local regulations. BBG assumes no responsibility or liability respecting regulatory permitting or compliance issues.

2.5 Special Terms and Conditions

There are no special terms and conditions associated with this ESA.

3.0 SUBJECT PROPERTY DESCRIPTION

3.1 Subject Property Details

Subject Property Size	7.41 acres
Property Size Source	Roanoke City Assessor
Parcel ID Number(s)	252-0119
Parcel ID Source	Roanoke City Assessor
Subject Property Usage	Industrial
Number of Buildings	One
Date of Construction	1992
Date of Construction Source	Roanoke City Assessor
Building Size	14,252 square feet (NRA)
Building Size Source	Owner provided
Legal Description	BBG was not provided with a legal description for the Subject Property, and a legal description was not readily available from other sources at the time of the assessment.
Tenants	The Subject Property is owner-occupied by LCM Corporation.

3.2 Utility and Service Providers

Electricity	Appalachian Power
Natural Gas	Roanoke Gas
Potable Water	City of Roanoke Utilities
Sanitary Sewer	City of Roanoke Utilities
Stormwater	City of Roanoke Utilities

Date of Utility Connection

Municipal water and sewer services were available at the time the current improvements were constructed.

3.3 Adjoining Properties

The ASTM Standard Practice defines adjoining properties as “any real property or properties the border of which is contiguous or partially contiguous with that of the Subject Property, or that would be contiguous or partially contiguous with that of the Subject Property but for a street, road, or other public thoroughfare separating them.” The following adjoining properties were noted.

Direction	Description
North	CSE, Inc., 3138 Salem Turnpike
East	State Electric Supply, 3105 Shenandoah Avenue NW; and Gemaire Distributors, 3109 Shenandoah Avenue NW
South	Southern Refrigeration, 3140 Shenandoah Avenue NW; vacant lot former Baker Roofing, 3308 Shenandoah Avenue NW; Triple's Appliances, 3320 Shenandoah Avenue NW; Euro Specialty, 3346 Shenandoah Avenue NW
West	Aireco Supply, 3355 Shenandoah Avenue NW

BBG's observations of the adjoining properties did not identify evidence that would indicate the potential presence of a REC, such as fueling facilities, dry cleaning operations, improperly stored or leaking drums, or significantly stained surfaces.

4.0 PHYSICAL SETTING

Information regarding topography, geology and hydrology are used to evaluate the likelihood of hazardous substances and petroleum products to migrate onto, within or from the Subject Property. BBG attempted to determine the general physical setting of the Subject Property using one or more of the physical setting sources outlined in Section 8.2.1 of the ASTM Standard Practice.

4.1 Topography

Property Elevation	Approximately 1,100 feet above mean sea level (MSL)
Topography	The Subject Property is moderately sloped, with a descending gradient to the south. The areas surrounding the Subject Property slope to the east-northeast.
Source	Property elevation and topography are based on observations made during BBG's May 13, 2024 site visit and upon review of the applicable United States Geological Survey (USGS) topographic map. The relevant portion of the topographic map is appended to this report.

4.2 Surface Water Bodies

On-Site Water Bodies	There are no surface water bodies on or bordering the Subject Property.
Nearest Surface Water Body	Based on review of the topographic map, the nearest off-site surface water body is Peters Creek located approximately 0.5 miles south.

4.3 Geology and Hydrology

Geology and Soils	The USGS identifies the Subject Property located within the Pumpkin Valley Shale and Rome Formation. This formation consists of shale, light-greenish-gray to dark-greenish-gray, grayish-brown, and maroon; a few beds of similar colored siltstone; sparse beds of limestone and dolostone. The Pumpkin Valley Shale conformably overlies the Rome Formation. The formation is approximately 350 feet thick and consists of siltstone, shale, sandstone, dolostone, and limestone. Siltstone and shale, greenish-gray and grayish-red, laminated to thin-bedded. Sandstone, micaceous, locally glauconitic, greenish-gray and reddish-gray, very-fine to medium-grained, thin-bedded. Dolostone, light- to dark-gray, aphanic to medium-grained, thin-to massive-bedded, with ripple marks and mudcracks. Lime stone, argillaceous, very-light-gray to dark-gray, thin- to medium- bedded. Carbonate rocks range from sparse 1- to 2- feet-thick
-------------------	--

	<p>beds in western Scott County to discontinuous units as much as 50 feet thick which comprise 30 to 40 percent of the formation in western Russell and Washington counties.</p> <p>Soils at the Subject Property are mapped as the Chiswell-Litz-Urban land complex, 2 to 15 percent slopes; well-drained; parent material residuum weathered from shale and siltstone and fine-grained sandstone; depth to restrictive feature one to three feet below ground surface.</p>
Source	<p>USGS Geologic Map of Virginia United States Department of Agriculture (USDA) Web Soil Survey</p>
Depth to Groundwater	<p>More than six feet below ground surface</p>
Anticipated Flow Direction	<p>East-northeast</p>
Basis of Flow Direction	<p>The USEPA <i>Ground Water Handbook, Vol.1 Ground Water and Contamination</i>, September 1990, states that the water table typically conforms to surface topography. This means the direction of flow for shallow groundwater is generally from higher elevations to lower elevations. Localized flow direction may vary as a result of tide, rainfall, development, geologic characteristics, nearby surface water bodies, underground utilities such as storm drains, septic systems and sewers, or other influences such as the presence of high-volume wells.</p>

4.4 Minerals Exploration and Production

Oil and Gas Wells	<p>No oil or gas wells or oil and gas production equipment were observed at the Subject Property. No wells were depicted on the USGS topographic map.</p>
Pipelines	<p>No petroleum pipelines were observed on or adjoining the Subject Property. No pipelines were depicted on the USGS topographic map.</p>
Mining Activities	<p>No mining activities were observed on or adjoining the Subject Property. No mining activities were depicted on the USGS topographic map.</p>

5.0 INTERVIEWS, RECORDS AND MUNICIPAL INFORMATION

5.1 User Provided Information

User provided information is intended to help identify the possibility of RECs in connection with the Subject Property. According to the ASTM Standard Practice and EPA's AAI Rule, the following items should be researched by the prospective landowner or grantee, and the results of such inquiries may be provided to the environmental professional. The responsibility for qualifying for Landowner Liability Protections (LLPs) by conducting the following inquiries ultimately rests with the User, and providing the following information to the environmental professional would be prudent if such information is available. The AAI rule does not require submission of this information to the environmental professional.

User Provided Information	User Provided	Issue Identified	Comments
Recorded Land Title Records	No	N/A	User did not provide BBG the results of a search of recorded land title records for the purpose of identifying environmental liens filed or recorded against the Subject Property or activity and use limitations (AULs) in place at the Subject Property under federal, tribal, state or local law.
Specialized or Actual Knowledge or Experience	No	N/A	User did not inform BBG of specialized knowledge of conditions indicative of releases or threatened releases at the Subject Property or at adjoining properties which could impact the Subject Property. User did not inform BBG of actual knowledge of environmental liens or AULs encumbering the Subject Property or in connection with the Subject Property.
Significantly Lower Purchase Price	No	N/A	User did not provide information to BBG indicating the purchase price of the Subject Property was below the fair market price for a comparable property, or that any difference in price was likely the result of the presence of hazardous substances or petroleum products.

User Provided Information	User Provided	Issue Identified	Comments
Commonly Known or Reasonably Ascertainable Information	No	N/A	User did not inform BBG of any commonly known or reasonably ascertainable information within the local community about the Subject Property.
Degree of Obviousness	No	N/A	User did not indicate any reason to suspect or have knowledge of the obvious presence or likely presence of releases or threatened releases at the Subject Property.
Reason for Performing the Phase I ESA	Yes	No	User indicated the reason for conducting the ESA was to assist with User's pre-foreclosure due diligence and to qualify for a landowner liability protection (LLP) to CERCLA liability.

5.2 Owners, Operators and/or Neighboring Properties

Key Site Manager

Key Site Manager/Property Escort	Lawrence Musgrove
Telephone/Email	540-344-5583
Pertinent Information	<p>Lawrence Musgrove has been associated with the Subject Property for 32 years. Mr. Musgrove stated that to the best of his knowledge he had no records or recollection of any releases, likely releases or imminent threat of releases of hazardous substances or petroleum products at the Subject Property. Mr. Musgrove was not aware of environmental liens filed against the Subject Property or any AULs filed or recorded against the Subject Property, or any past, threatened or pending lawsuits or administrative proceedings related to environmental issues. Mr. Musgrove was not aware of underground storage tanks (USTs) or aboveground storage tanks (ASTs) on the Subject Property, or of any concerns relating to water infiltration or microbial growth.</p> <p>BBG requested copies of any previous environmental assessments. No such documents were provided to BBG by Lawrence Musgrove BBG inquired about the historical uses of the Subject Property. Lawrence Musgrove advised that prior to development of the current improvements in 1992 the property was used as a drive-in movie theater.</p>

Occupants

Other than the Key Site Manager discussed above, no additional occupants were available to be interviewed as part of this assessment.

Previous Owners

BBG was unable to locate the Subject Property's former owner.

5.3 Municipal/Government Agencies

Department Name	Roanoke Fire-EMS Department
Contact	Ronnie Campbell
Telephone/Email/Website	ronnie.campbell@roanokeva.gov
Pertinent Information	BBG facilitated a Freedom of Information Act (FOIA) request for fire department files pertaining to USTs, ASTs, reported incidents of hazardous material releases, or other similar circumstances that could be of environmental concern at the Subject Property. According to available records, no dispatches or inspections at this location in response to a leak, or spill of hazardous wastes, petroleum products or tank removals was reported. Two vehicle fire incidents dated 12/27/2008 and 5/24/2018 were reported and are included for review. No environmental concerns noted.

Department Name	City of Roanoke Permit Center
Contact	Valerie Staten
Telephone/Email/Website	valerie.staten@roanokeva.gov
Pertinent Information	BBG facilitated a Freedom of Information Act (FOIA) request for copies of certificates of occupancy, permits for the installation or removal of tanks, or other similar circumstances that could be of environmental concern at the Subject Property. A response has not been received as of the date of this report. Based on the other information obtained during this assessment, the lack of a response is not considered significant in the identification of RECs associated with the Subject Property.

Department Name	Virginia Department of Health City of Roanoke Office
Contact	Online request
Telephone/Email/Website	https://vdh.nextrequest.com/requests/24-6166

<p>Pertinent Information</p>	<p>BBG facilitated a Freedom of Information Act (FOIA) request for health department files pertaining to USTs, ASTs, reported incidents of hazardous material releases, or other similar circumstances that could be of environmental concern at the Subject Property. A response has not been received as of the date of this report. Based on the other information obtained during this assessment, the lack of a response is not considered significant in the identification of RECs associated with the Subject Property.</p>
------------------------------	---

<p>Department Name</p>	<p>Virginia Department of Environmental Quality Blue Ridge Regional Office</p>
<p>Contact</p>	<p>Rebecca Wright</p>
<p>Telephone/Email/Website</p>	<p>(540) 759-6582</p>
<p>Pertinent Information</p>	<p>BBG facilitated a Freedom of Information Act (FOIA) request for files pertaining to USTs, ASTs, reported incidents of hazardous material releases, or other similar circumstances that could be of environmental concern at the Subject Property and adjoining properties. Numerous files were provided for the Subject Property. Please refer to Section 6.2 for further discussion. BBG contacted DEQ Regional Office Waste Team Lead Rebecca Wright, and was informed that to the best of her knowledge the subject facility was currently compliant with Waste Department guidelines but she had not been on-site for several years. The most recent VDEQ Inspector, Nicole Tilley was unavailable at the time of this report. Storage of used oil is permitted in the wash bay and outside the wash bay in enclosed areas. In the event of closure of the facility all used oil and regulated waste such as asbestos bags in storage would be removed. Environmental testing such as soil and groundwater sampling would not necessarily be performed.</p> <p>Files were requested for the LST listing at adjacent property 3320 Shenandoah Avenue NW however DEQ found no responsive records for PC 20002082 due to file retention. Refer to <u>Section 6.1</u> for additional discussion.</p> <p>Files were also provided for the VRP listing adjac property 3308 Shenandoah Avenue NW. Refer to <u>Section 6.1</u> for additional discussion.</p>

6.0 ENVIRONMENTAL RECORDS

BBG obtained a commercially-available regulatory records database report containing the standard environmental record sources identified in ASTM 1527-21 as well as any additional environmental record source determined to be: 1) reasonably ascertainable; 2) sufficiently useful, accurate and complete; and 3) generally obtained, pursuant to local good commercial or customary practice in initial ESAs in the type of commercial real estate transaction involved. A detailed description of the records reviewed and a listing of all of the identified sites are appended to this report. Accuracy and completeness of record information varies among information sources and is often inaccurate or incomplete. BBG cannot warrant the accuracy of the information, but has made reasonable efforts to compensate for mistakes or insufficiencies in the information reviewed that are obvious in light of other information of which BBG has actual knowledge. BBG reviewed the environmental record sources to identify sites involved in the storage, use, generation, disposal, or release of petroleum products and/or hazardous substance and has evaluated the potential for releases at the Subject Property or the migration of contaminants onto the Subject Property from off-site sources via soil, groundwater, or vapor. The potential for a vapor encroachment condition (VEC) will be evaluated following ASTM E2600-22 Standard guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions.

6.1 Environmental Records Sources

Environmental Records Source Table			
Environmental Record Sources	Approximate Minimum Search Distance	Subject Property Listings	Off-Site Properties
Federal NPL	1.0 mile	No	No
Federal Delisted NPL	0.5 mile	No	No
Federal SEMS/CERCLIS	0.5 mile	No	No
Federal SEMS Archive/CERCLIS NFRAP	0.5 mile	No	No
Federal RCRA CORRACTS	1.0 mile	No	Yes
Federal RCRA TSD	0.5 mile	No	No
Federal RCRA generators	Property and adjoining	Yes	Yes
Federal institutional/engineering controls	Property only	No	Not Applicable
Federal ERNS	Property only	No	Not Applicable
State and tribal-equivalent NPL	1.0 mile	No	No
State and tribal-equivalent CERCLIS	0.5 mile	No	No

Environmental Records Source Table			
Environmental Record Sources	Approximate Minimum Search Distance	Subject Property Listings	Off-Site Properties
State and tribal landfill and solid waste	0.5 mile	Yes	Yes
State and tribal leaking storage tanks	0.5 mile	No	Yes
State and tribal registered storage tanks	Property and adjoining	No	No
State and tribal institutional/engineering controls	Property only	No	Not Applicable
State and tribal voluntary cleanup	0.5 mile	No	Yes
State and tribal Brownfield	0.5 mile	No	Yes
Additional environmental record sources	Various	Yes	Yes

Anticipated groundwater flow direction: East-northeast

The groundwater flow direction is used to determine whether sites are located up-, cross- or down-gradient of the Subject Property, which provides an indication of their potential to impact the Subject Property.

Subject Property

The Subject Property, under the name LCM Corp., addressed as 3321 Shenandoah Avenue, was identified on the Resource Conservation and Recovery Act (RCRA) generator database as a Non-Generator (NON GEN) with EPA ID: VAR000012005. Pre-Transport and general administrative violations were identified for this facility between April and September 1998. The Subject Property was identified in the Facility Index System (FINDS). FINDS is a compilation of multiple databases. It contains both facility information and 'pointers' to other sources that contain more details. The Subject Property is identified in FINDS due to its RCRA generator status.

The Subject Property was identified under the name LCM Corp. - Transfer Station on the Solid Waste Landfills (SWF/LF) database. Based on a review of information on file with the Virginia Department of Environmental Quality (VDEQ), VDEQ staff inspected the facility on March 22, 1994 noting that two waste piles of petroleum-contaminated soil were on-site. The Department considered this site to be an unpermitted solid waste disposal facility. On April 13, 1994, the VDEQ received documentation of LCM's intent to properly dispose of the petroleum contaminated soil by thermal treatment. LCM was cited by the Department in 1994 for unpermitted storage of petroleum-contaminated soil. The 1994 violation was resolved informally without enforcement action. Additional violations were noted in 1998 including storage of petroleum contaminated soil and other solid waste without a permit. The Department received a notice of intent to operate a transfer station. By September 1998, LCM and VDEQ signed a consent order with the Department regarding the violations of hazardous and solid waste laws. BBG reviewed available Virginia DEQ files which included a Pollution Incident Summary Report dated May 9, 2013. The report identified a wire burning incident

complaint reported by the City of Roanoke Environmental Management, which included a site visit by the VDEQ on March 31, 2015. No visual evidence of a wire-burning incident was noted, and No Further Action (NFA) was recommended. According to an LCM Operations Plan dated September 29, 2014, this facility operates as an environmental services contractor with operations including industrial cleaning, vacuuming, asbestos and lead abatement, as well as emergency assistance to petroleum and chemical incidents. The Operations Plan indicated that work could involve the removal of contaminated soils after hours and on weekends; therefore, LCM would stage this material at the facility. As such, LCM requested a Transfer Station Permit by Rule for the storage of non-hazardous materials at the facility. VDEQ issued a warning letter in December 2020 due to this facility not having proper signage and for extended storage of asbestos waste. The deficiencies were reportedly fixed by January 2021. No violations were observed during the July 2021 inspection. VDEQ Deficiency Letters were issued for this facility in August 25, 2022 and August 8, 2023 for not maintaining their proof of financial assurance. These deficiencies were corrected by November 2022 and December 2023, respectively. According to a February 21, 2024 No Deficiency Letter, no apparent violations were noted during a January 31, 2024 Compliance Inspection of solid waste. An April 11, 2024 VDEQ Warning Letter regarding a records review of the inspection, in which observations noted that the Solid Waste Information and Assessment (SWIA) report for the 2023 calendar year was due by March 31, 2024. The VDEQ sent out reminder emails to submit the report on January 23, 2024, and March 28, 2024. The VDEQ sent an email to Mr. Musgrove on April 1, 2024, informing him that the report was late. The VDEQ received the facility's SWIA report on April 1, 2024. A Solid Waste Information and Assessment Program Reporting Table Form DEQ 50-25 for LCM Corp - Transfer Station, was submitted April 22, 2024. The annual reporting period for 2023 was included in the VDEQ files. A comment was added during report submission on April 2, 2024 which indicated no petroleum contaminated soil was listed. However, petroleum-contaminated soils were listed in earlier reports dating back to 2014.

Additionally, the Subject Property, under the name LCM Corporation, was identified on the SPILLS database for a SPILL of petroleum to the ground which occurred in February 2020. The SPILL is identified with a Closed status as of April 1, 2020. The VDEQ issued a warning letter regarding the release of petroleum, case IR#294508, dated April 2, 2020. The letter stated that the VDEQ had reason to believe LCM may be in violation of State Water Control Law Code 62.1-44.2, Virginia Waste Management Act Code 10.11-1400, and Virginia Hazardous Management Regulations 9VAC20-60-10. This letter addressed conditions at the facility and compliance requirements. During the February 19, 2020 compliance inspection, VDEQ staff observed numerous 55-gallon containers stored on-site outside of the permitted transfer area (wash bay). Some of the drums were open and appeared empty. Others were closed. The ground around some of the drums was heavily stained by oil. Please refer to [Section 7.13](#) and [Section 8.1](#) for additional information regarding historical site use and onsite material storage.

Adjoining Properties

The following adjoining properties were noted:

- Baker Roofing/Baker and Hitching, LLC, addressed as 3308 Shenandoah Avenue NW, and located adjacent to the south-southeast (cross-gradient), was identified on the RCRA generator database as a Large Quantity Generator (LQG), FINDS/FRS, INSTITUTIONAL CONTROLS, SPILLS and Voluntary Remediation Program (VRP) databases. The facility is listed as generating tetrachloroethylene. No violations are noted for the facility. BBG accessed the USEPA Enforcement and Compliance History

Online (ECHO) report for more information. According to the ECHO Report, the current compliance status is listed as "No Violations." Per the ECHO Report, no inspections have been conducted at the site. No enforcement actions have been taken against the facility. A SPILLS listing in January 2005 indicated a Pollution Incident Summary Report for Baker Roofing due to a SPILL of petroleum to the ground. The report identified an unknown employee changing oil in car and dumping the waste oil into storm drain. The discharge volume was unknown. The VDEQ site summary notes indicated that no evidence was found to validate the complaint. According to the Incident Summary Report, this incident was listed as closed in February 2005.

This facility was also identified as a Dry Cleaner site on the Voluntary Remediation Program (VRP) database, under the name, Baker and Hitchings LLC. The VRP Application was received in December 2019 and the site was enrolled in January 2020. The VRP Certificate is dated August 11, 2021. BBG reviewed available VDEQ file information which included a VRP Certificate of Satisfactory Completion of Remediation. Historical drycleaning activities operated between 1964 and 1973. Trace compounds of concern were observed in soil samples with none of the concentrations exceeded screening levels. Groundwater was impacted above screening levels from samples on the south portion of this facility (approximately 250 feet to the south of the Subject Property). A Declaration of Restrictive Covenant was recorded for this facility in February 2022 which specified that groundwater shall not be used for any purpose other than environmental monitoring. A Voluntary Remediation Program Certification of Satisfactory Completion of Remediation was issued by VDEQ in August 2021. Based on the cross-gradient location, VDEQ case closure and reported distance to the remaining groundwater contamination (approximately 250 feet to the south), this facility is not considered a REC in connection with the Subject Property.

- The USA Clean facility, addressed as 3320 Shenandoah Avenue, is located adjacent to the south-southwest, and was identified on the Leaking Storage Tank (LST) database. Based on the regulatory database report, a release was suspected in December 1999. The facility is identified with a Closed status. This status is granted to those sites that have been remediated to the satisfaction of the regulatory authority or do not required cleanup. The VDEQ informed BBG that due to the age of the records, they have been deleted from department files. Based on the regulatory status, amount of time since the release and cross-gradient hydrogeologic position, BBG does not consider this listing to represent a REC in connection with the Subject Property.
- Euro-Specialty, Inc., addressed as 3346 Shenandoah Avenue, was identified on the [redacted] database as a Very Small Quantity Generator (VSQG). The facility is listed as generati [redacted] waste, tetrachloroethylene, trichloroethylene and spent non-halogenated solvents. Pre- [redacted] oil and general administrative violations were identified for this facility on October 17, 2002. The facility returned to compliance the same day. BBG accessed the USEPA ECHO report for more information. According to the ECHO Report, the current compliance status is listed as "No Violations." Per the ECHO Report, the last RCRA inspection was conducted in April 2012. No enforcement actions have been taken against the facility in the last five years. This facility was also identified on the SPILLS database for an aerial slag compliant in September 2018. A caller complained that slag originating from the facility was aerially deposited onto freshly painted vehicles at his collision repair facility. Subsequent investigation was unable to definitively determine source of particulate matter and no compliance deficiencies were found in connection with the facility. Based on the lack of noted violations or enforcement actions, lack

of visual indication of concern noted during the reconnaissance, and the fact the facility is not listed on any other databases of sites with suspected or confirmed releases, this facility is not considered a REC in connection with the Subject Property and additional file review is not warranted.

- Structural Steel, addressed as 3138 Salem Turnpike, and located adjoining to the north-northeast, was identified on the RCRA-NON GEN database. This facility was previously identified as a Small Quantity Generator in 2011 and 2015. The facility previously generated ignitable waste, methyl ethyl ketone and spent non-halogenated solvents. No violations or enforcement actions have been identified for the facility. Based on the lack of noted violations or enforcement actions, lack of visual indication of concern noted during the reconnaissance, and the fact the facility is not listed on a database of sites with suspected or confirmed releases, this facility is not considered a REC in connection with the Subject Property and additional file review is not warranted.

Other Properties Warranting Discussion

BBG reviewed the listed non-adjoining sites and determined no sites of concern relative to the Subject Property were noted due to distance, groundwater gradient, nature of the listing, information provided in the database report, and/or online regulatory agency records.

6.2 Environmental Records Summary

BBG did not identify environmental records for the Subject Property 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 Subject Property or into the ground, groundwater, or surface water of the Subject Property that would be considered a REC.

BBG did not identify environmental records indicating a release of hazardous substances or petroleum products from neighboring properties likely to migrate onto the Subject Property via soil, groundwater or vapor pathways that would be considered a REC or a VEC in connection with the Subject Property.

7.0 HISTORICAL USES

BBG attempted to develop a history of the previous uses of the Subject Property and surrounding area in order to help identify the likelihood of past uses having led to RECs in connection with the Subject Property. Efforts were made to identify the uses of the Subject Property back to the Subject Property's first use, or back to 1940, whichever is earlier. BBG relied upon the standard historical sources listed in Section 8.3.4 of the ASTM Standard Practice. Only the sources deemed both reasonably ascertainable and likely to be useful were used.

Dates	Aerial Photographs	Fire Insurance Maps	USGS Topographic Maps	Local Street Directories	Prior Reports	Other
Pre-1940	✓		✓	✓		
1940				✓		
1945	✓			✓		
1950				✓		
1955	✓			✓		
1960	✓		✓	✓		
1965	✓		✓	✓		
1970	✓			✓		
1975			✓	✓		
1980	✓		✓	✓		
1985	✓			✓		
1990				✓		
1995	✓			✓		
2000	✓			✓		
2005	✓			✓		
2010	✓			✓		
2015	✓		✓	✓		
2020	✓			✓		

7.1 Aerial Photographs

Aerial photographs, which are of a sufficient resolution to allow identification of development and activities of areas encompassing the Subject Property, can be used in documenting the historical usage of a property. BBG reviewed the following aerial photographs, copies of which are included in Appendix 5:

Year(s)	Property Description	Adjoining Property Description
1937 1947	Developed with agricultural land	North: Agricultural land East: Agricultural land South: Agricultural land West: Agricultural land
1956 1960	Appears developed with a drive-in movie theater	North: Vacant land East: Vacant land South: Developed with one building across the road West: Vacant land
1968 1970	No significant changes	North: Developed with a large commercial-type building East: Vacant land with apparent scattered vehicles beyond South: Developed with several commercial-type buildings across the road West: Developed with a commercial-type building
1982 1988	No significant changes	North: No significant changes East: Vacant land South: No significant changes West: No significant changes
1995	Developed with the current building and driveway areas; some equipment and vehicles shown in vacant field	North: No significant changes East: No significant changes South: No significant changes West: No significant changes
2003 2005 2006 2008 2009 2011 2012 2014 2016 2018 2021 2023	No significant changes	North: No significant changes East: A commercial building South: No significant changes except a large commercial building appears southeast (across road) by 2005 West: No significant changes

7.2 Fire Insurance Maps

Historically maps were produced which showed the location and use of structures on a property at a given point in time. These maps were widely available for areas that were significantly developed during the late 1800s through the 1950s, though coverage exists for some areas through the 1990s. BBG attempted to obtain historical maps from ERIS covering the Subject Property. No historical Sanborn maps were identified. The “no coverage” notification is appended to this report.

7.3 Property Tax Files

- Tax files are files kept for property tax purposes by the local jurisdiction where the Subject Property is located and may include records of past ownership, appraisals, maps, sketches, and photographs. BBG reviewed the property tax files for the Subject Property available online from the Roanoke City Assessor. The website included general property information such as property size, building size and date of construction, which has been incorporated into the applicable sections of this report. According to the Roanoke City Assessor, the Subject Property consists of one parcel that is owned by LCM Corporation. No significant historical use information was provided. No indications of environmental concern were noted.

7.4 Recorded Land Title Records

Land title records are records of historical fee ownership, which may include leases, land contracts and AULs on or of the Subject Property recorded in the place where land title records are, by law or custom, recorded for the local jurisdiction in which the Subject Property is located, often such records are kept by a municipal or county recorder or clerk. Such records may be obtained from title companies or directly from the local government agency. BBG ordered a chain of title from ERIS. The information provided in the chain of title is summarized in the table below. The chain of title noted that the County records show that the Grantor listed in 1984, owned the property back to 1952. The chain of title is appended to this report.

Date	Grantor	Grantee
11/21/1984	Betty Francis Trinkle and James L. Trinkle	Multi Cinema LTD
2/20/1990	Multi Cinema LTD	LCM Corporation

7.5 Environmental Lien and Activity Use Limitations (AULs)

At the request of User, BBG ordered a lien search to obtain recorded land title records for the purpose of identifying environmental liens filed or recorded against the Subject Property or AULs in place at the Subject Property under federal, tribal, state or local law. No environmental liens or AULs were identified. The lien search is appended to this report.

7.6 Historical USGS Topographic Maps

Historical topographic maps can indicate whether an area is undeveloped, lightly developed or heavily developed and can also indicate if roads, railroad tracks, quarrying operations or water bodies were previously or near a property. BBG reviewed the following topographic maps.

Year(s)	Property Description	Adjoining Property Description
1929 1933	Undeveloped	North: Undeveloped East: Undeveloped South: Undeveloped beyond road West: Undeveloped
1962 1963	Developed with drive-in theater	North: No significant changes East: No significant changes South: Several buildings shown across road West: No significant changes
1968 1977 1978 1984	No significant changes	North: Developed with commercial-type buildings East: No significant changes South: Developed with commercial-type buildings West: Developed with commercial-type buildings
2016 2019	These maps only show roadways and landmark structures. No significant features were depicted and no significant information was provided. The maps are used primarily for topographic purposes.	

7.7 Local Street Directories

Local street directories identify the name of the individual or company located at a given address. BBG ordered a local street directory search from ERIS. The following local street directories were reviewed:

Year(s)	Property Description	Adjoining Property Description
1926 1947	Address not listed	North: Address not listed East: Address not listed South: Address not listed West: Address not listed
1951 1954	Address not listed	North: Address not listed East: Address not listed South: 3346 Shenandoah Ave NW-Sou Insulation and Refractory / Hampshire Organizations West: Address not listed

Year(s)	Property Description	Adjoining Property Description
1959	Shenandoah Drive In Theatre (3320 Shenandoah Avenue NW)	<p>North: Address not listed</p> <p>East: Address not listed</p> <p>South: Silver Line storm doors (3346 Shenandoah Ave); Rke Steam Laundry & Dry Cleaners (3308 Shenandoah Ave NW); Electroplating (3338 Shenandoah Ave NW); Blue Ridge Pin (3340 Shenandoah Ave NW)</p> <p>West: Address not listed</p>
1964	Shenandoah Drive-In Theatre (3309 Shenandoah Avenue NW)	<p>North: Address not listed</p> <p>East: Address not listed</p> <p>South: Pittsburg Testing Lab (3346 Shenandoah Ave); Rke Steam Laundry & Dry Cleaners (3308 Shenandoah Ave NW); Suppliers welding (3338 Shenandoah Ave NW); Barnes Millwork (3334 Shenandoah Ave NW)</p> <p>West: Starland Bowl (3355 Shenandoah Ave NW)</p>
1967	Shenandoah Drive-In Theatre (3309 Shenandoah Avenue NW)	<p>North: Address not listed</p> <p>East: Address not listed</p> <p>South: Vacant (3346 Shenandoah Ave); Roanoke Steam Laundry & Dry Cleaners (3308 Shenandoah Ave NW); Suppliers welding (3338 Shenandoah Ave NW); Pittsburg Testing Lab (3334 Shenandoah Ave NW)</p> <p>West: Starland Bowl (3355 Shenandoah Ave NW)</p>
1971	Shenandoah Drive-In Theatre (3309 Shenandoah Avenue NW)	<p>North: Structural Steel fabricators (3138 Salem Turnpike)</p> <p>East: Address not listed</p> <p>South: Vacant (3346 Shenandoah Ave); Roanoke Steam Laundry & Dry Cleaners (3308 Shenandoah Ave NW); Suppliers welding (3338 Shenandoah Ave NW); Pittsburg Testing Lab (3334 Shenandoah Ave NW)</p> <p>West: Starland Bowl (3355 Shenandoah Ave NW)</p>
1976	Shenandoah Drive-In Theatre (3309 Shenandoah Avenue NW)	<p>North: Structural Steel fabricators (3138 Salem Turnpike)</p> <p>East: Address not listed</p> <p>South: Vacant (3346 Shenandoah Ave); Roanoke Area Association for Retarded Citizens (3308 Shenandoah Ave NW);</p>

Year(s)	Property Description	Adjoining Property Description
		Suppliers welding (3338 Shenandoah Ave NW); Pittsburg Testing Lab (3334 Shenandoah Ave NW) West: Starland Bowl (3355 Shenandoah Ave NW)
1981 1986	Shenandoah Drive-In Theatre (3309 Shenandoah Avenue NW)	North: Structural Steel fabricators (3138 Salem Turnpike) East: Address not listed South: Dixie Body Shop (3346 Shenandoah Ave); Industrial (3308 Shenandoah Ave NW); Suppliers welding (3338 Shenandoah Ave NW); Walt's Shooting Club (3334 Shenandoah Ave NW); Havanaer Supply (3320 Shenandoah Ave NW) West: Starland Arena (3355 Shenandoah Ave NW)
1990 1991	No listings	North: Structural Steel fabricators (3138 Salem Turnpike) East: Address not listed South: Dixie Body Shop (3346 Shenandoah Ave); Industrial (3308 Shenandoah Ave NW); Suppliers welding (3338 Shenandoah Ave NW); Walt's Shooting Club (3334 Shenandoah Ave NW); Havanaer Supply (3320 Shenandoah Ave NW) West: CHD Industries (3355 Shenandoah Ave NW)
1996 2000 2003 2008	Lawrence Musgrove, LCM (3321 Shenandoah Ave NW)	North: Structural Steel fabricators (3138 Salem Turnpike) East: Address not listed South: Euro Specialty (3346 Shenandoah Ave NW); Industrial and Baker Roofing (3334 Shenandoah Ave NW); No listing (3334 Shenandoah Ave NW); Havanaer Supply (3320 Shenandoah Ave NW) West: CHD Industries (3355 Shenandoah Ave NW)
2012 2016 2020 2022	Lawrence Musgrove, LCM (3321 Shenandoah Ave NW)	North: Structural Steel fabricators (3138 Salem Turnpike) East: Address not listed

Year(s)	Property Description	Adjoining Property Description
		<p>South: Euro Specialty (3346 Shenandoah Ave); Baker Roofing (3308 Shenandoah Ave NW); No listing (3338 Shenandoah Ave NW); No listing (3334 Shenandoah Ave NW); Rockfab (3320 Shenandoah Ave NW); Southern Refrigeration (3140 Shenandoah Ave NW)</p> <p>West: CHD Industries (3355 Shenandoah Ave NW)</p>

7.8 Building Department Records

- Building department records generally consist of local government records indicating permission of the local government to construct, alter, or demolish improvements on the Subject Property. Often building department records are located in the building department of a municipality or county. BBG submitted a FOIA request to the City of Roanoke Permit Center for information relating to the Subject Property. BBG has not received a response to our request as of the date of this report. The lack of a response is not considered a significant concern due to the sufficient prior use history obtained through the other standard historical sources.

7.9 Zoning/Land Use Records

- Zoning or land use records generally consist of local government records indicating the uses permitted by the local government in particular zones within its jurisdiction. The records may consist of maps and/or written records. The records are often located in the planning department of a municipality or county. BBG reviewed zoning/land use records which indicate the Subject Property is zoned I-1 (Industrial).

7.10 Previous Assessment/Reports

BBG was not provided any previous reports for the Subject Property

7.11 Other Historical Sources

Other historical sources include sources that are credible to a reasonable degree and that identify past uses of the Subject Property. This category includes, but is not limited to: miscellaneous maps, newspaper archives, internet sites, community organizations, local libraries, historical societies, current owners or occupants of neighboring properties, or records in the files and/or personal knowledge of the property owner and/or occupants. BBG did not review other historical sources for the Subject Property based on prior use history obtained through the other standard historical sources.

7.12 Data Failure

A significant data gap is defined as a data gap that affects the ability of the environmental professional to identify a recognized environmental condition. Based on the information above, it is BBG's opinion that the following data failures, as defined in Section 8.3.6 of the ASTM guidelines, have occurred in attempting to document the historical uses of the Subject Property:

- While BBG was able to document the historical uses of the Subject Property back prior to 1940, the Subject Property was already developed at the earliest documented source. Given that the prior use was agricultural, this data failure is not considered a significant data gap.
- Some of the intervals between documented sources exceeded five years; however, based on the similar usage during the periods documented, this data failure is not considered a significant data gap.

None of the data failures affected the ability of the Environmental Professionals involved in this assessment to identify RECs in connection with the Subject Property; therefore, they are not considered significant data gaps.

7.13 Historical Use Summary

The Subject Property was developed with agricultural land from at least 1937 until the mid-1950s, when it was developed with a drive-in movie theater, which operated until the late 1980s. In 1992, the Subject Property was redeveloped with the current improvements. The Subject Property has been occupied by LCM Corporation from the early 1990s to present day.

The Subject Property has been occupied by LCM Corporation for approximately 30 years. This facility performs environmental services including after-hours responses to petroleum and chemical incidents which results in the interim storage of asbestos and lead paint abatement materials and the storage of contaminated soils on the Subject Property. Deficiencies in the storage of these materials including the prolonged storage of materials, storage of the materials outside the permitted areas and evidence of stained soils have been reported in documentation reported by the Virginia Department of Environmental Quality (VDEQ). Further information regarding VDEQ inspections are further discussed in Section 6.1. Furthermore, additional information regarding current onsite material storage is further discussed in Section 8.1. Given the long term storage and handling of hazardous substances on the Subject Property (for approximately 30 years), BBG considers the historical usage of the Subject Property a REC.

The adjoining and surrounding properties were developed with agricultural land from at least 1937 until the late 1950s. The adjoining and surrounding properties have been used for commercial and industrial uses from the early 1960s until present day.

The Subject Property and surrounding area have a history of agricultural usage. A wide variety of pesticides may have been used during this period and residual levels of these materials may still be present. No information was obtained indicating evidence of improper storage, disposal or application of these materials and a review of available aerial photographs did not show improvements such as hangars, runways or large barns that would indicate significant storage, formulation and handling of these materials. Based on the lack of information indicating improper use of these chemicals, the redevelopment of the Subject Property, the

presence of the building and pavement covering the majority of the Subject Property, and the fact the Subject Property is served by a municipal drinking water supply, BBG does not consider the historical agricultural usage a REC.

8.0 PROPERTY RECONNAISSANCE AND INVESTIGATION

8.1 Methodology and Limiting Conditions

Assessor	Whit Richardson, Professional Associate
Date of Reconnaissance	May 13, 2024
Weather Conditions	Sunny with temperatures around 80 degrees Fahrenheit
Property Escort	Lawrence Musgrove, property owner
Methodology	The property reconnaissance consisted of visual observations of the Subject Property and improvements, adjoining properties, as viewed from the Subject Property boundaries, and the surrounding area based on visual observations made from adjacent public thoroughfares. Building exteriors were observed along the perimeter from the ground, unless described otherwise. Representative interior areas were observed as they were made safely accessible, unless described otherwise.
Areas Accessed	All areas were accessible during the assessment.
Inaccessible Areas	No areas were inaccessible during the assessment.
Other Limitations	No other significant limitations or physical obstructions were encountered during the Subject Property reconnaissance.

8.2 Visual Observations

Item/Condition Identified	Yes	No
Hazardous Substance and Petroleum Products in Connection with Identified Uses	✓	
Hazardous Substance and Petroleum Products in Connection with Unidentified Uses		✓
Drums and Containers of Unidentified Substance or Petroleum Products	✓	
Aboveground and Underground Storage Tanks	✓	
Strong, Pungent or Noxious Odors		✓
Pools of Liquids		✓
Electrical or Hydraulic Equipment likely to Contain Fluids	✓	
Heating and Cooling Source	✓	
Interior Stains or Corrosion other than from Water	✓	
Floor Drains, Sumps, Clarifiers and Oil/Water Separators	✓	

Item/Condition Identified	Yes	No
Pits, Ponds and Lagoons		✓
Exterior Stained Soils or Pavement	✓	
Stressed Vegetation		✓
Onsite Solid Waste Disposal or Unknown Fill		✓
Wastewater	✓	
Wells		✓
Septic Systems and Cesspools		✓
Other	✓	

Hazardous Substances and Petroleum Products in Connection with Identified Uses

The Subject Property is occupied by LCM Corporation, a hazardous waste and environmental services contractor. BBG observed the storage of oil in small containers (<5-gallons) and waste oil stored in 55-gallon drums within the building and stored outside of the building in unpaved areas. The 55-gallon metal drums stored outside were observed to be rusted and evidence of staining was observed in close proximity to some of the drums. Evidence of an oil spill was observed on the floor of the garage portion of the building. Mr. Musgrove provided a waste manifest dated April 2022 from Valcor Environmental Services for the removal of 448 gallons of waste oil from the Subject Property.

Material	Quantity/Location	Condition
New and used oil	Approximately twelve 55-gallon drums and 50 gallons in smaller containers / central area garage floor	Stored in place for at least several years, evidence of spills and staining was observed
New and used oil, paint, and other unlabeled containers	Approximately 50-100 gallons in smaller containers / garage floor areas near door	Stored in place for at least several years, evidence of spills and staining was observed
New and used oil, paint, and other unlabeled containers	Approximately 300 gallons in containers <5-gallons and 55-gallon drums / open storage trailer on west side of building	Stained soils outside storage trailer, floor of trailer damaged and appeared stained
Used oil	Approximately 500 gallons in various containers including 55-gallon drums / outside storage trailer on west side of building	Stained soils observed, some containers rusted

Drums and Containers of Unidentified Substance or Petroleum Products

BBG observed various small containers (<5-gallons in capacity) and unlabeled 55-gallon drums stored throughout the interior and exterior portions of the Subject Property. Evidence of staining was observed in the garage portion of the building, and in unpaved exterior areas as further discussed below.

Aboveground and Underground Storage Tanks

Based on observations made during the site visit, interviews, and a review of regulatory records, no current or former aboveground storage tanks (ASTs) or underground storage tanks (USTs) for operational use were identified at the Subject Property.

However, BBG observed approximately 10 empty tanks that were reportedly removed from off-site properties. The tanks were located in an unpaved area on the northern portion of the Subject Property. No evidence of staining or odors was observed in the vicinity of the tanks.

Electrical or Hydraulic Equipment Likely to Contain Fluid

BBG noted a pole-mounted transformer located along the road in front of the Subject Property, which are owned by Appalachian Power, the regional utility. No signs of leakage were noted; therefore, the electrical equipment is not considered a REC.

The manufacture of PCBs was banned in 1979. Based on the post-1979 date of construction of the property improvements, it is unlikely that PCB-containing electrical equipment is present.

Heating and Cooling Source

Heating, ventilation and air conditioning (HVAC) are provided by natural gas and electric package systems/split systems. No evidence of past or present heating oil usage was observed or reported.

Interior Stains or Corrosion other than from Water

No stains or corrosion on floors, walls, or ceilings was observed except approximately ten square feet of oily liquid on the concrete floor around waste oil storage in the garage. No floor drains or cracked concrete was observed in this area.

Floor Drains, Sumps, Clarifiers and Oil/Water Separators

Several small interior sanitary drains were noted. No staining was observed in the vicinity of the drains. Part of the garage area is designated as a wash bay and it is assumed that a larger drain is present in this area, however, the area is now covered with storage of miscellaneous items and the floor was not visible.

BBG observed an apparent oil/water separator (OWS) beneath an enclosure to the west of the building. The OWS is reportedly connected to the municipal sewer system and has not been used for several years. No additional information regarding the drains or maintenance/service of the OWS was available. Given the storage, handling and generation of petroleum products and hazardous materials within the building, the absence of maintenance/service of the OWS, and the presumed age of the system (approximately 32 years), the OWS is considered a REC.

Exterior Stained Soils or Pavement

BBG observed evidence of staining in the unpaved areas to the west of the building. Staining was also observed on the cracked pavement on the north side of the building.

Wastewater

No wastewater streams were noted or reported to BBG with the exception of standard sanitary waste and stormwater discharges. Sanitary wastes discharge to the municipal wastewater treatment system. Stormwater flows off the Subject Property by sheet flow, percolates into the ground or discharges to the municipal stormwater system.

Other

BBG observed various equipment and construction debris throughout the exterior portions of the Subject Property, including but not limited to, polyethylene storage tanks, metal storage tanks, piping, metal debris, trucks, boats, gravel materials, and tires. BBG also observed various drums and containers of oil and other petroleum products/hazardous materials stored outside as discussed above.

8.3 Visual Observations Summary

The Subject Property is occupied by LCM Corporation, a hazardous waste and environmental services contractor. BBG observed various drums and containers of petroleum products, paint, and other hazardous materials stored in unpaved areas outside of the building. Additionally, various equipment and construction debris was observed throughout the exterior portions of the Subject Property, including but not limited to, polyethylene storage tanks, metal storage tanks, piping, metal debris, trucks, boats, gravel materials, and tires. BBG observed evidence of staining in the unpaved areas to the west of the building and on the cracked pavement on the north side of the building. As such, the storage of various drums, containers and miscellaneous equipment and materials in unpaved areas outside of the building and the observed staining is considered a REC.

Several small floor drains were observed within the building. Additionally, a portion of the garage area was formerly used as a wash bay, however, BBG was unable to confirm the presence of a drain in this area due to the floor being covered with the storage of various items. BBG observed an apparent oil/water separator (OWS) beneath an enclosure to the west of the building. The OWS is reportedly connected to the municipal sewer system and has not been used for several years. No additional information regarding the drains or

maintenance/service of the OWS was available. Given the storage, handling and generation of petroleum products and hazardous materials within the building, the absence of maintenance/service of the OWS, and the presumed age of the system (approximately 32 years), the OWS is considered a REC.

The Subject Property is located in Radon Zone 3, counties which have a predicted average indoor radon screening less than 2 pCi/L, which is below the USEPA action level of 4 pCi/L. The USEPA's action level applies to residential, not commercial, properties. Based on the low regional averages and non-residential use, radon is not considered a BER.

9.3 Lead-Based Paint (LBP)

Lead was added to paint as a pigment, to speed drying, increase durability or to resist moisture. Although lead improves paint, it was found to pose a health hazard, particularly to children under the age of six, whose bodies are still developing. A paint is considered LBP if it contains lead equal to or exceeding 1.0 milligram per square centimeter or 0.5 percent by weight, or 5,000 parts per million (ppm) by weight.

A preliminary evaluation for the presence of LBP was conducted. The evaluation was based on the age of the improvements, the extent of renovations, property usage, and past analytical testing, if available. The Consumer Product Safety Commission banned the use of lead in paint in 1978, 16 CFR 1303. Most manufacturers, however, had ceased using lead well before this time. Paint applied after 1978 is not considered suspect LBP.

A comprehensive LBP survey was not conducted as part of this assessment. Conclusions are based on observations of representative areas only. A finding that LBP is not a significant concern cannot be interpreted as the building is free of LBP.

Based on the post-1978 date of construction, it is unlikely that LBP was utilized. LBP is not considered a BER.

9.4 Drinking Water

The potential for concerns relating to elevated levels of contaminants, particularly lead, was evaluated. The evaluation looked at the source of drinking water and analytical data, if available.

The Subject Property receives its water from Western Virginia Water Authority. Water supplied to the subject property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper; therefore, drinking water quality is not considered a BER.

9.5 Microbial Growth

Molds are usually not a problem indoors, unless mold spores land on a wet or damp surface and begin to grow. Molds have the potential to cause health problems. Molds produce allergens (substances that can cause allergic reactions), irritants, and in some cases, potentially toxic substances (mycotoxins). Inhaling or touching mold or mold spores may cause allergic reactions in sensitive individuals. Allergic responses include hay fever-type symptoms, such as sneezing, runny nose, red eyes, and skin rash (dermatitis). Allergic reactions to mold are common. They can be immediate or delayed. Molds can also cause asthma attacks in people with asthma who are allergic to mold. In addition, mold exposure can irritate the eyes, skin, nose, throat, and lungs of both mold-allergic and non-allergic people. Symptoms other than the allergic and irritant types are not commonly reported as a result of inhaling mold. Research on mold and health effects is ongoing.

BBG conducted a preliminary visual screening for readily observable microbial growth and conditions conducive to microbial growth at the Subject Property. Observations were limited solely to the portions of the Subject Property walked and the evaluation should not be construed as a comprehensive microbial growth survey for the Subject Property. No sampling was conducted and no assessment of areas behind walls or in any other way generally inaccessible was performed. In addition, BBG interviewed property representatives regarding past or current water leaks, infiltration or ponding, tenant complaints of microbial growth or health problems, known current mold problems or other concerns relating to indoor air quality at the Subject Property.

No visual or olfactory indications of microbial growth or water infiltration were noted during the property reconnaissance. According to Mr. Musgrove, there are no known areas of leaks or water infiltration at the Subject Property and no known problems related to microbial growth. Microbial growth is not considered a BER.

9.6 Flood Zone and Wetlands

BBG attempted to determine if the Subject Property was located in a flood hazard area or contained jurisdictional wetlands. This screening was based solely on a review of available FEMA Flood Insurance Rate Maps (FIRM) and the United States Fish and Wildlife Service National Wetlands Inventory (NWI) website. This screening should not be considered a formal flood hazard determination or wetlands delineation.

Based on information provided by FEMA, the Subject Property is in Zone X, Area of Minimal Flooding.

No federally regulated wetlands are located on the Subject Property, based on the United States Fish & Wildlife Service National Wetlands Inventory website.

9.7 ASTM Non-Scope Consideration Summary

BBG observed several bags labeled as "Asbestos" stored within the building and in a dump truck on the northern portion of the Subject Property. Although the asbestos containing materials are contained within bags, the storage of ACM on the Subject Property is considered a BER.

10.0 FINDINGS, OPINIONS, AND CONCLUSIONS

10.1 Findings, Opinions and Conclusions

BBG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527 of 3321 Shenandoah Avenue Northwest, Roanoke, Virginia, the Subject Property. Any exceptions to, or deletions from, this practice are described in Section 11 of this report. This assessment has revealed no evidence of RECs/CRECs in connection with the Subject Property except for the following:

- The Subject Property has been occupied by LCM Corporation for approximately 30 years. This facility performs environmental services including after-hours response to petroleum and chemical incidents which results in the interim storage of asbestos and lead paint abatement materials and the storage of contaminated soils and drums on the Subject Property. Deficiencies in the storage of these materials including the prolonged storage of materials, storage of the materials outside the permitted areas and evidence of stained soils have been reported in documentation reported by the Virginia Department of Environmental Quality (VDEQ). Additionally, BBG observed various drums and containers of petroleum products, paint, and other hazardous materials stored in unpaved areas outside of the building. Additionally, various equipment and construction debris was observed throughout the exterior portions of the Subject Property, including but not limited to, empty polyethylene storage tanks, empty metal storage tanks, piping, metal debris, trucks, boats, gravel materials, and tires. BBG observed evidence of staining in the unpaved areas to the west of the building and on the cracked pavement on the north side of the building. Given the observed site conditions and the long term storage and handling of hazardous substances on the Subject Property (for approximately 30 years), BBG considers the long-term use, the storage of various drums, containers and miscellaneous equipment and materials in unpaved areas outside of the building and the observed staining of the Subject Property a REC.
- Several small floor drains were observed within the building. Additionally, a portion of the garage area was formerly used as a wash bay, however, BBG was unable to confirm the presence of a drain in this area due to the floor being covered with the storage of various items. BBG observed an apparent oil water separator (OWS) beneath an enclosure to the west of the building. The OWS is reportedly connected to the municipal sewer system and has not been used for several years. The maintenance/age of the OWS was not available. The OWS is used for the storage of petroleum products and hazardous materials within the building. The OWS is approximately 32 years old.

This assessment has revealed no evidence of de minimis conditions.

The assessment has revealed no evidence of HRECs in connection with the Subject Property.

No significant data gaps were identified that would affect the ability of the environmental professional to identify RECs at the Subject Property.

This assessment has revealed no evidence of BERs associated with the standard ASTM scope considerations.

This assessment has revealed no evidence of BERs relating to ASTM non-scope considerations except for the following:

- BBG observed several bags labeled as "Asbestos" stored within the building and in a dump truck on the northern portion of the Subject Property. Although the asbestos containing materials are contained within bags, the storage of ACM on the Subject Property is considered a BER.

11.0 DEVIATIONS AND ADDITIONAL SERVICES

The following items deviated from the ASTM 1527-21 Standard:

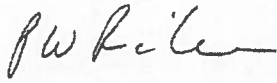
- The Standard offers a "Recommended Table of Contents and Report Format." While BBG's report includes all of the information required by the Standard, BBG did not follow the recommended table of contents and report format for all sections of the report.
- The Standard only requires that the preparer of the report determine the presence of RECs, CRECs and HRECs, if any, or data gaps that prevent a conclusion regarding the presence of RECs, CRECs and HRECs being made.
- At the request of Client asbestos-containing materials, radon, lead-based paint, drinking water quality, and mold were addressed in this ESA. These are considered Non-Scope Considerations by the Standard.
- At the request of Client, a preliminary evaluation was made to determine if the Subject Property was located in a flood plain or if portions of the Subject Property could be classified as wetlands. These are considered Non-Scope Considerations by the Standard.
- The results of additional inquiries required under section §312.22 of 40 CFR 312 and Section 6 of the ASTM Standard were not provided to BBG. All appropriate inquiry does not require submission of this information to the environmental professional.

12.0 DECLARATION OF ENVIRONMENTAL PROFESSIONAL

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312.

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Prepared By:



Whit Richardson
Professional Associate

Reviewed By:



Matthew Sheridan
Director

Client Manager:



Kristen Campos
Managing Director

Date of Declaration of Environmental Professional: May 22, 2024

Consultant Internal Audit

Consultant Internal Audit Documentation Form

Reviewer's Certification

REVS Number: WF-CWS-24-002110-0001-02E

Property Address: 3321 Shenandoah Avenue Northwest, Roanoke, Virginia 24017

The subject report has been reviewed by the undersigned and, except as detailed in the attached explanation, is considered to be in full compliance with the specific items included in this following checklist and with all other requirements of the agreed scope of investigations. The reviewer concurs with the conclusions and recommendations of the report and understands that the report may be returned for correction of any deficiencies.

Signature:



Name: Kristen Campos

Date: May 22, 2024

Quality Control Audit

- Y Was the report reviewed and signed by the Wells Fargo National Account Manager or their approved designee?
- Y Was the site investigation completed by Environmental Professional with at least five years of experience in completing similar investigations?
- Y Is the work performed under this investigation covered by the consultant's General Liability and Professional Liability (Errors & Omissions) insurance policies?
- Y Are the location of RECs, significant environmental features, and regulatory designations indicated on the site plan per Section 8 of the Scope of Work?
- Y Is the property boundary shown on all historic sources (i.e., aerial photos, Sanborn maps, topographic maps, etc.)?
- Y Are all of the supporting documents described in Section 8 of the Scope of Work included in the appendix of the Report?

Y Were all areas of the property inspected as required by Section 5 of the Scope of Work (i.e., 100% of all common areas/mechanical areas (all properties), 100% of down/vacant units (multi-family & hotel/motel), 10% of occupied units (multi-family), 5% of units/minimum of 10 units (hotel/motel), common area parcel (condominiums), etc.?

Y If the report recommends the completion of additional investigation at the property, is the description of the additional investigation required adequate to facilitate future investigation by someone not familiar with the current condition of the site?

13.0 DETAILED SCOPE OF WORK

This ESA was conducted in accordance with ASTM *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* ASTM E1527-21 (Standard), the All Appropriate Inquiries (AAI) Rule 40 CFR Part 312, and any additional requirements of Client.

The scope of services for this assessment included an evaluation of the following:

Physical characteristics – Consistent with Section 8.2.1 of the ASTM Standard Practice, a current USGS 7.5 Minute Topographic Map (or equivalent) showing the area on which the Subject Property is located shall be reviewed. It is the only standard physical setting source and the only physical setting source that is required to be obtained (and only if it is reasonably ascertainable). One or more additional physical setting sources may be obtained in the discretion of the environmental professional. Because such sources provide information about the geologic, hydrogeologic, hydrologic, or topographic characteristics of a site, discretionary physical setting sources shall be sought when deemed necessary by the environmental professional.

Environmental Records – Consistent with Section 8.2.2 of the ASTM Standard Practice, a review of the standard federal, state and tribal environmental records will be reviewed. Pursuant to Section 8.2.4 of the ASTM Standard Practice, additional local records and/or additional federal, state, or tribal records shall be checked when, in the judgment of the environmental professional, such additional records (1) are reasonably ascertainable, (2) are sufficiently useful, accurate, and complete in light of the objective of the records review, and (3) are generally obtained, pursuant to local good commercial and customary practice, in initial environmental site assessments in the type of commercial real estate transaction involved. If the Subject Property or any of the adjoining properties is identified on one or more of the standard environmental record sources, pertinent regulatory files and/or records associated with the listing will be reviewed provided the records are reasonably ascertainable and are available within a reasonable distance, cost and timeframe. If, in the environmental professional's opinion, such a review is not warranted, the environmental professional will provide an explanation within the report the justification for not conducting the regulatory file review.

Uses of the Subject Property – Consistent with Section 8.3.8 of the ASTM Standard Practice, all obvious uses of the Subject Property shall be identified from the present, back to the Subject Property's first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources in 8.3.4.1 through 8.3.4.8 as are necessary and both reasonably ascertainable and likely to be useful. The term "developed use" includes agricultural uses and placement of fill dirt. The report shall describe all identified uses, justify the earliest date identified, and explain the reason for any gaps in the history of use. Review of standard historical sources at less than approximately five year intervals is not required by this practice (for example, if the Subject Property had one use in 1950 and another use in 1955, it is not required to check for a third use in the intervening period). If the specific use of the Subject Property appears unchanged over a period longer than five years, then it is not required by this practice to research the use during that period.

Historical Research - Consistent with Section 8.3 of the ASTM Standard Practice, the Subject Property, adjoining properties, and nearby properties were reviewed using the following information where reasonably ascertainable or available: aerial photographs, fire insurance maps, local street directories, topographic maps, building department records, interviews, property tax files, zoning land use records and other historical sources.

Site Reconnaissance - Consistent with Sections 9.2.1 and 9.2.2 of the ASTM Standard Practice, on a visit to the Subject Property (the site visit), the Subject Property shall be visually and/or physically observed and any structure(s) located on the Subject Property to the extent not obstructed by bodies of water, adjacent buildings, or other obstacles shall be observed. The periphery of the Subject Property shall be visually and/or physically observed, as well as the periphery of all structures on the Subject Property, and the Subject Property shall be viewed from all adjacent public thoroughfares. If roads or paths with no apparent outlet are observed on the Subject Property, the use of the road or path shall be identified to determine whether it was likely to have been used as an avenue for disposal of hazardous substances or petroleum products. On the interior of structures on the Subject Property, accessible common areas expected to be used by occupants or the public (such as lobbies, hallways, utility rooms, recreation areas, etc.), maintenance and repair areas, including boiler rooms, and a representative sample of occupant spaces, shall be visually and/or physically observed. It is not necessary to look under floors, above ceilings, or behind walls.

The ASTM Standard Practice recognizes that there may be environmental issues or conditions at a property that parties may wish to consider. These are considered ASTM Non-Scope Considerations. The following ASTM non-scope considerations were included:

Asbestos Containing Material (ACM) - The potential for the presence of ACM was evaluated based on the age of the improvements, dates of renovation, and other relevant information. Appendix G of the USEPA Guidance Document: *Managing Asbestos in Place - A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials* (the Green Book) was used as a guide in identifying suspect materials and the definition of suspect ACM and presumed asbestos containing material is taken from 29 CFR Parts 1910, et al. *Occupational Exposure to Asbestos; Final Rule*. Only readily accessible building materials were observed. No destructive means were utilized to gain access to hidden or inaccessible areas such as pipe chases, wet columns, wall voids and ceiling cavities. The level of this preliminary assessment was not intended to comply with the survey requirements of the Asbestos Hazard Emergency Response Act (AHERA) 40 CFR Part 763, National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR 61; the General Duty Clause, 29 USC 654, Section 5; or other federal, state or local regulation.

Radon - The potential for elevated levels of indoor radon was based on available analytical results, published regional average levels, the usage of the buildings, and the type of construction and mechanical systems present. This evaluation was not designed or intended to comply with any regulatory agency requirements. Sampling, if any, was conducted using short-term radon detectors. The results of such testing are intended solely as a screen and may not be indicative of long-term average radon levels.

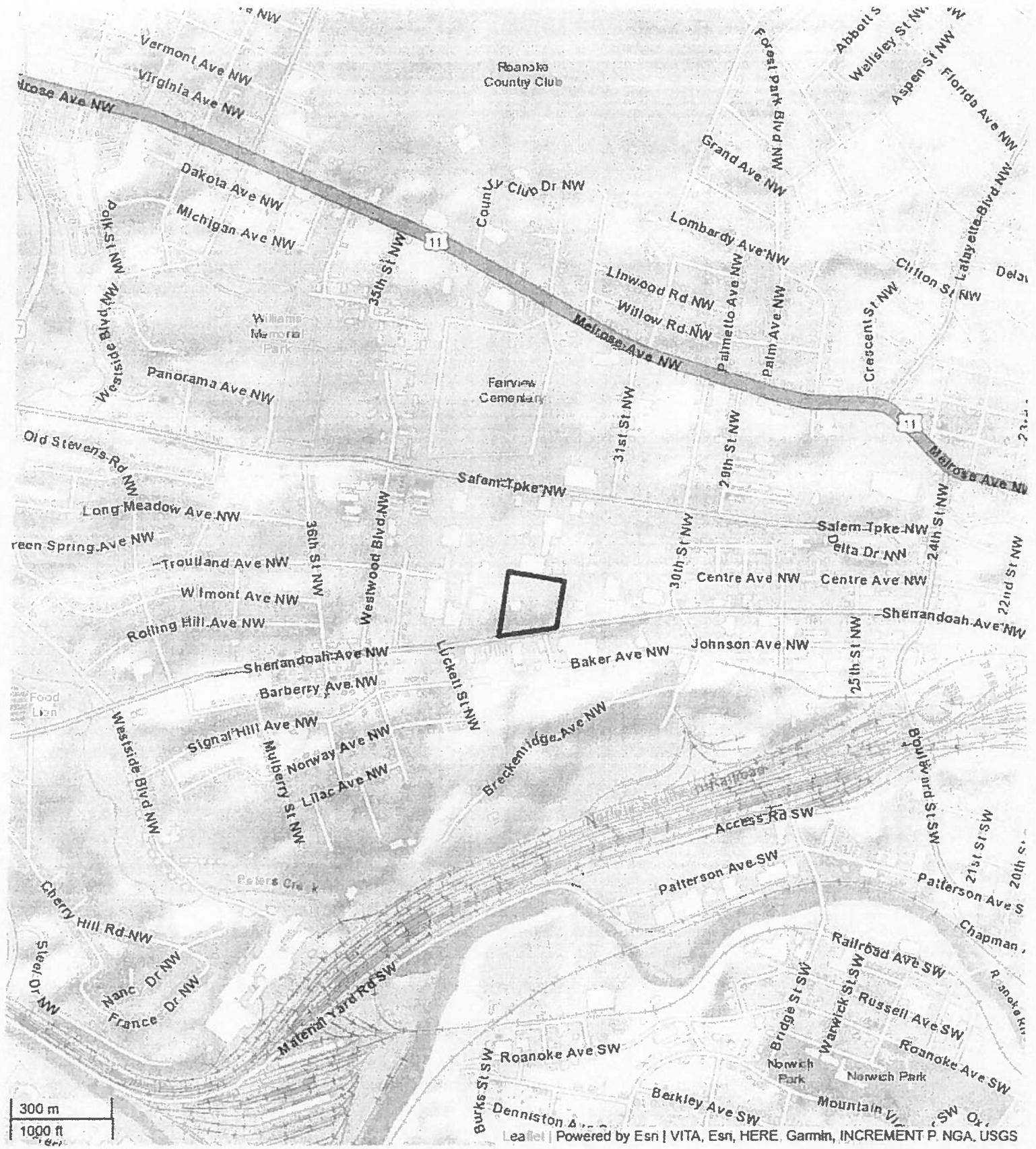
Lead-Based Paint (LBP) – The potential for the presence of LBP at the Subject Property was based on available analytical data, the age of the improvements, dates of renovation, and the current and proposed usage of the Subject Property. This evaluation was not designed or intended to comply with survey requirements outlined in Housing and Urban Development (HUD) regulations or other federal, state or local regulation.

Lead in Drinking Water – The potential for elevated levels of lead in the drinking water at the Subject Property was based on available analytical data, a determination of the source of the drinking water supply and a review of publically available compliance data reports.

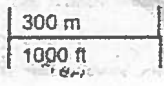
Microbial Growth – The potential for microbial growth at the Subject Property was based on visual observations for signs of water intrusion, water damage, and suspect mold growth and interviews with property representatives. These observations were limited to the areas walked and should not be considered a comprehensive survey of the Subject Property. A finding in this report that “mold is not a significant concern” or “no significant mold was identified” should not be interpreted as the building is free of mold.

Flood Plains and Wetlands - Evaluation based solely on a review of available Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM), or equivalent, and the United States Fish and Wildlife Service National Wetlands Inventory website. This screening should not be considered a formal flood hazard determination or wetlands delineation.

Appendix A Property Maps

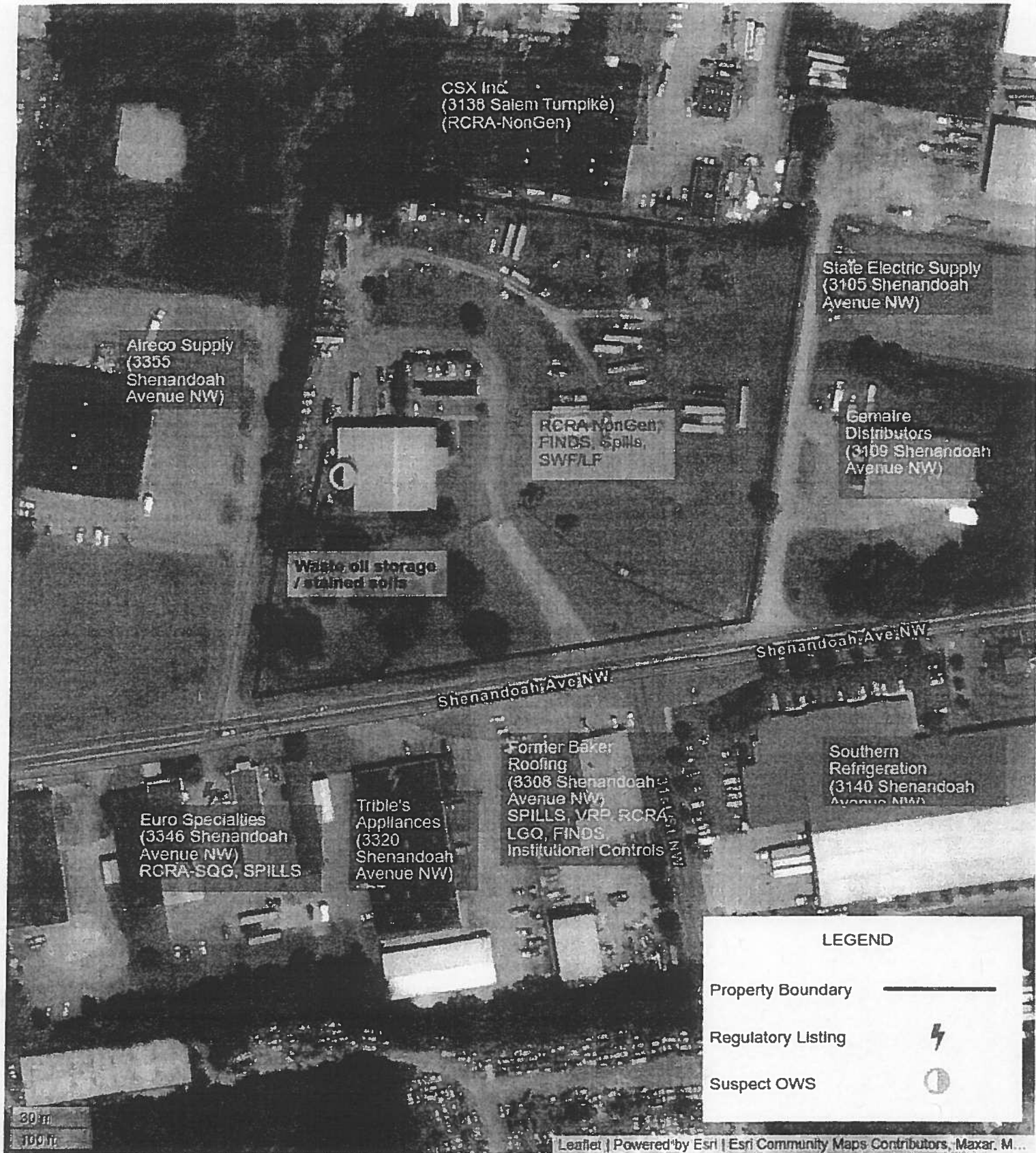


Leaflet | Powered by Esri | VITA, Esri, HERE, Garmin, INCREMENT P, NGA, USGS



Subject Property Location
 3321 Shenandoah Ave NW
 3321 Shenandoah Avenue Northwest
 Roanoke, VA 24017-4941
 BBG Project No. 0524004112





Leaflet | Powered by Esri | Esri Community Maps Contributors, Maxar, M...

Subject Property Layout

3321 Shenandoah Ave NW
 3321 Shenandoah Avenue Northwest
 Roanoke, Virginia 24017
 BBG Project No. 0524004112

Anticipated Groundwater Flow Direction: East-northeast





© 2010 Leaflet | Powered by Esri | USGS, National Geographic Society, L-cubed

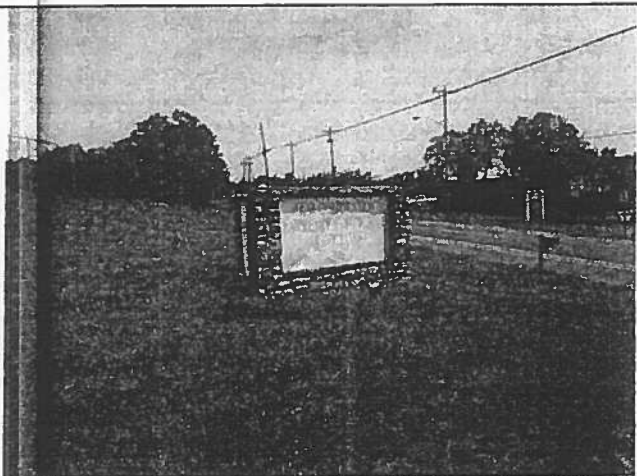
Topographic Map

3321 Shenandoah Ave NW
 3321 Shenandoah Avenue Northwest
 Roanoke, VA 24017-4941
 BBG Project No. 0524004112

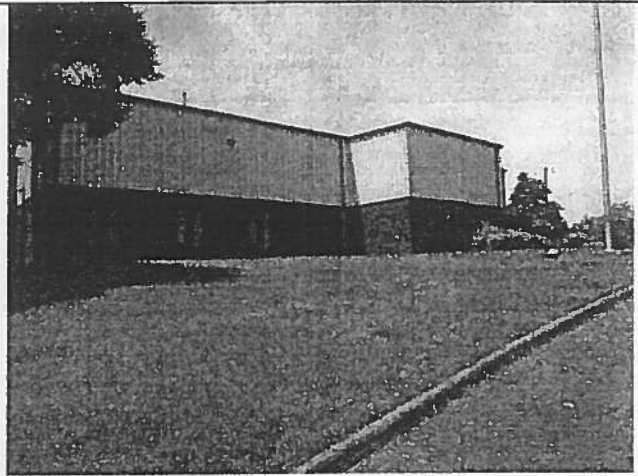


BBG
 REAL ESTATE SERVICES

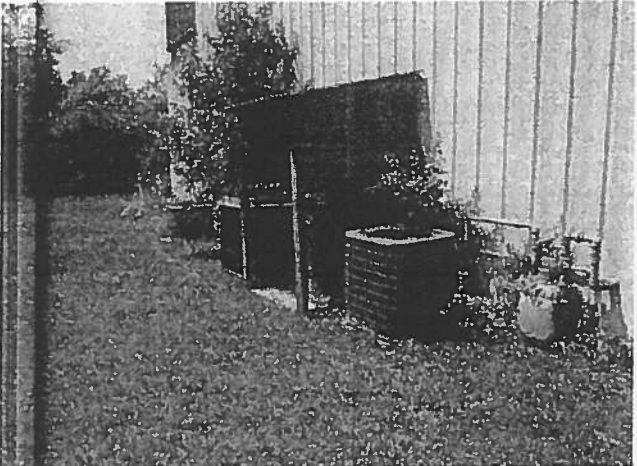
Appendix B Photographs



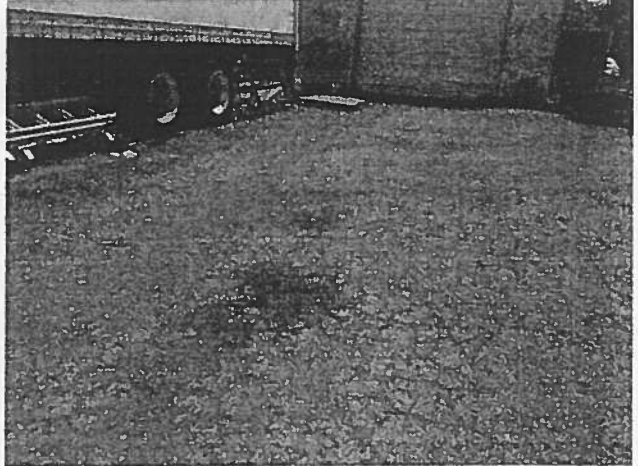
1. Entrance sign



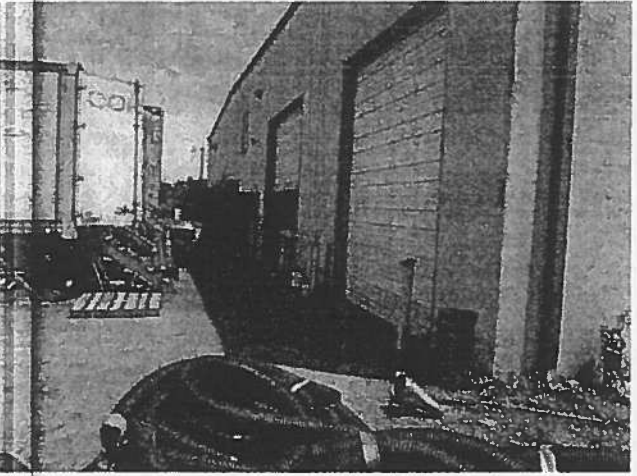
2. Front of building, east side



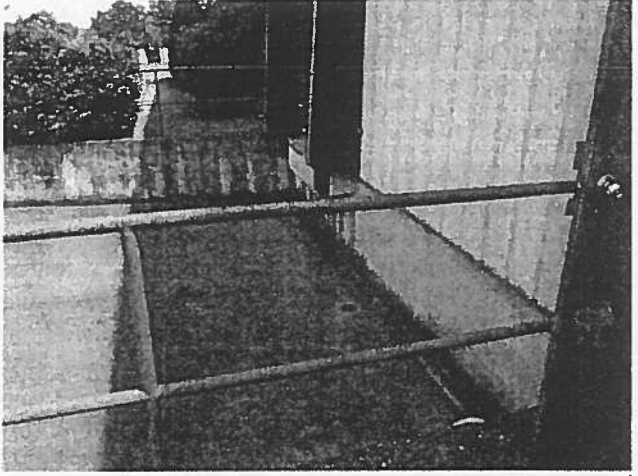
3. Heat pumps south side of building



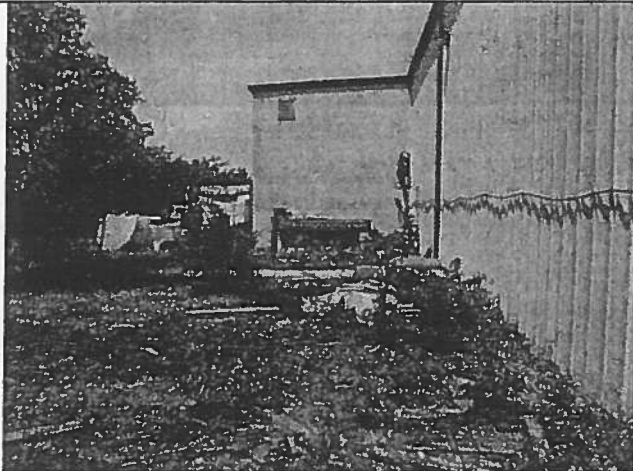
4. Garage bay on north side of building



5. Garage bays on north side of building



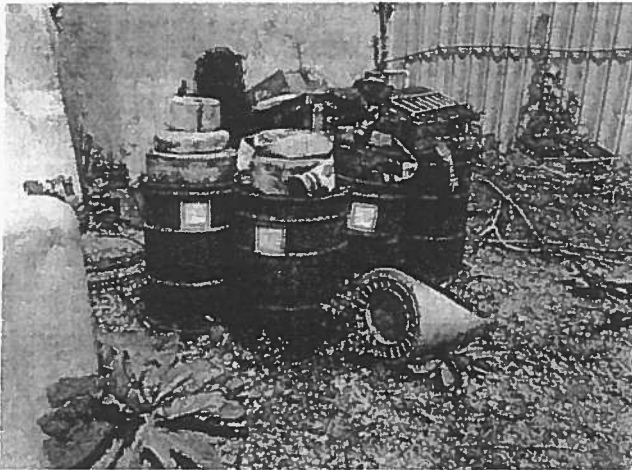
6. Storm drain in garage bay entry, north side of building



7. West side of building, stained soils, note suspect oil-water separator enclosure against wall



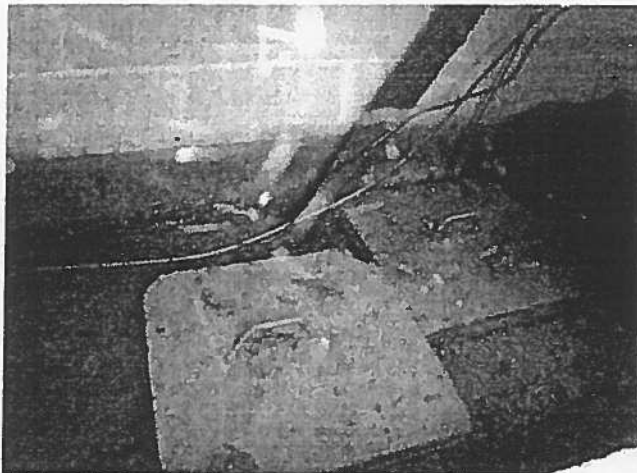
8. West side of building, dirty oil tanker suction piping



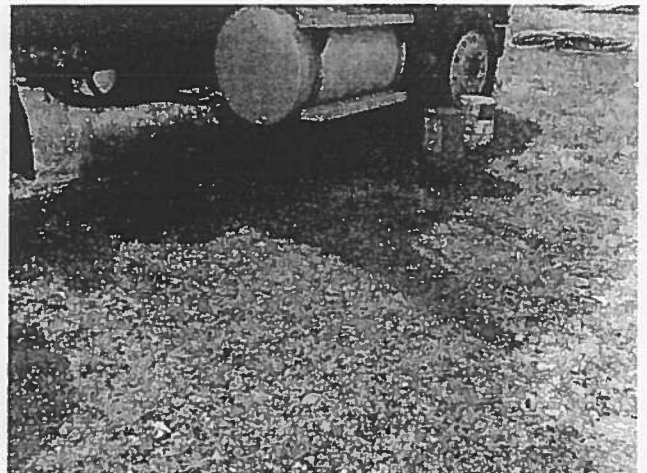
9. Waste oil storage west side building



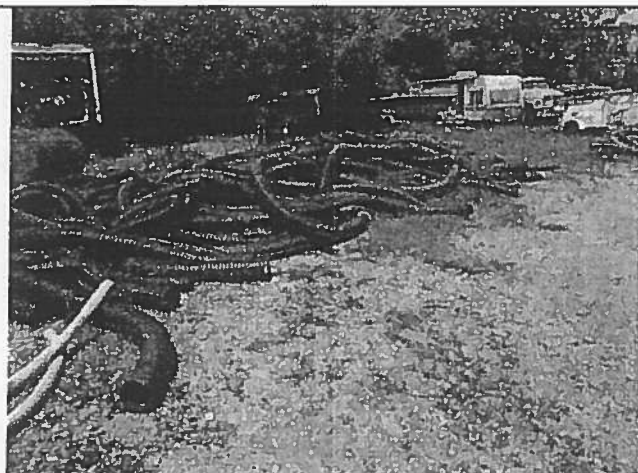
10. Trailer for waste oil storage on west side of building



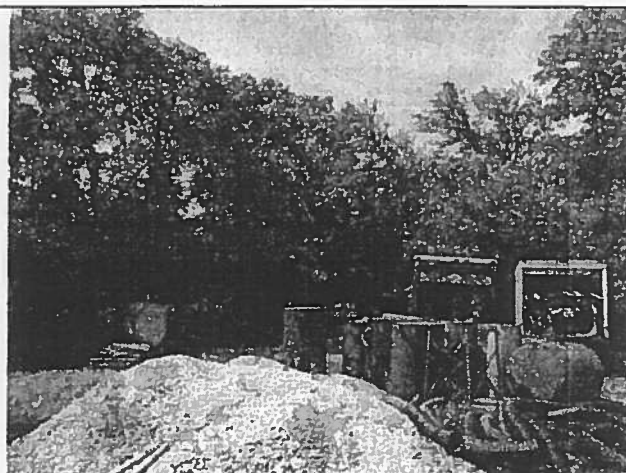
11. Inside suspect oil water separator



12. Soil staining under truck on northeast side



13. Used oil truck suction piping north side



14. Fill material and empty residential heating oil tanks on north side



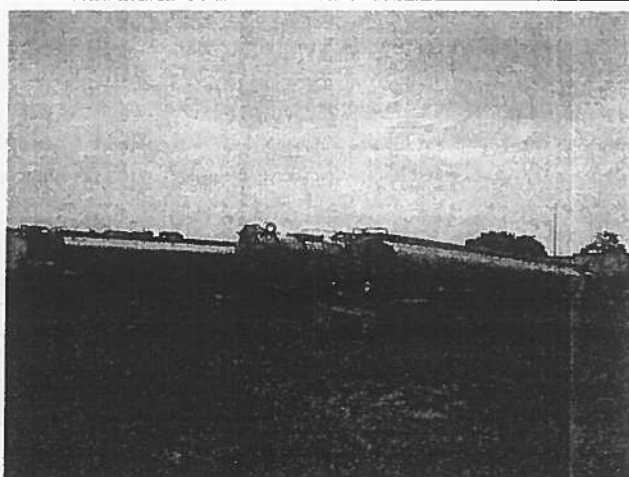
15. Waste oil drum north side



16. Signage on northeast side



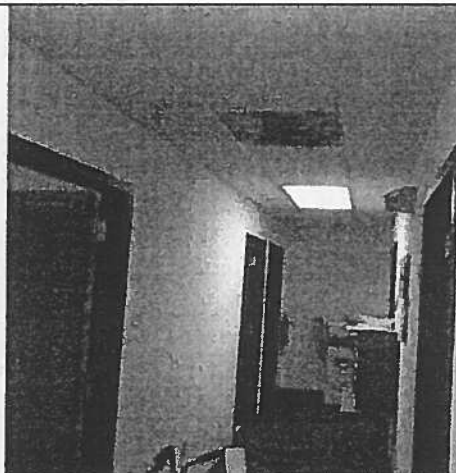
17. Abandoned tanks and debris northeast side



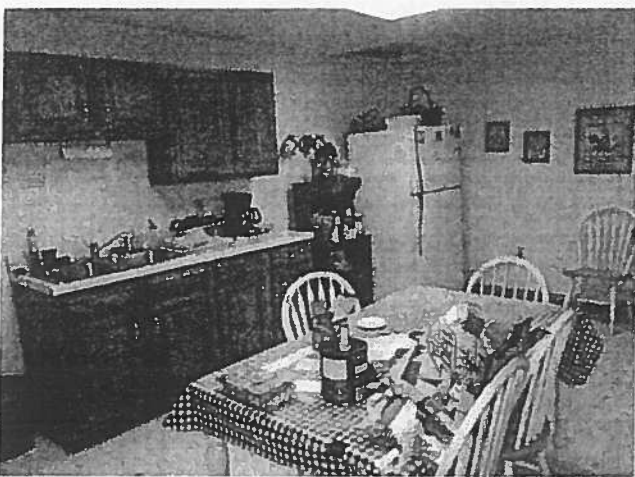
18. Tanker parking east side



19. Exterior storage of equipment/materials



20. Office area



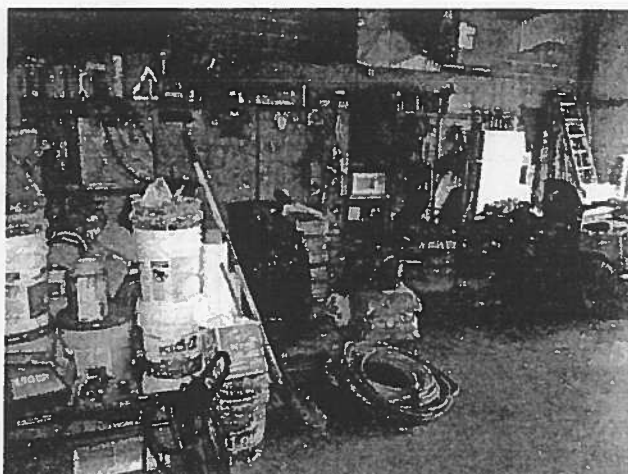
21. Lunch room



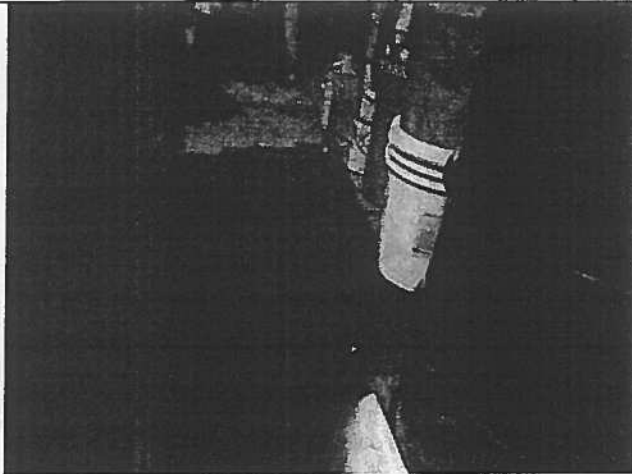
22. Asbestos bag



23. Asbestos bag storage



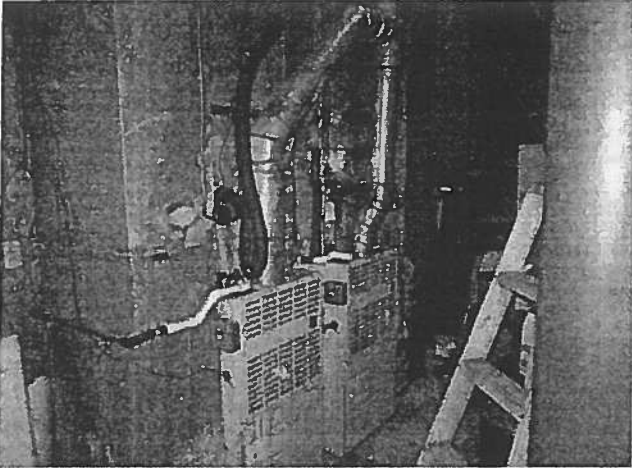
24. Garage bay



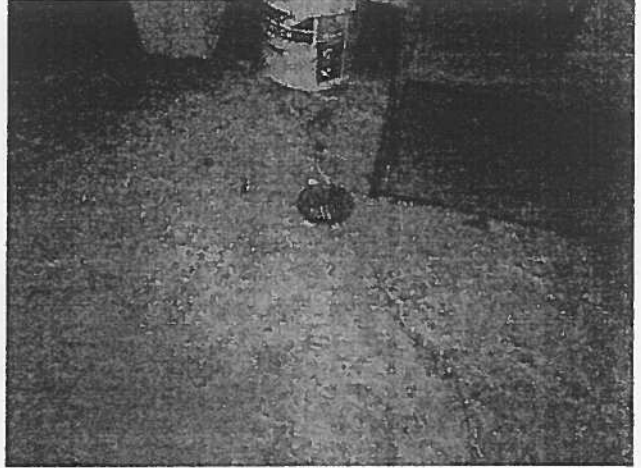
25. Oil spill on floor central garage area



26. Waste oil storage in garage bay



27. HVAC units in garage



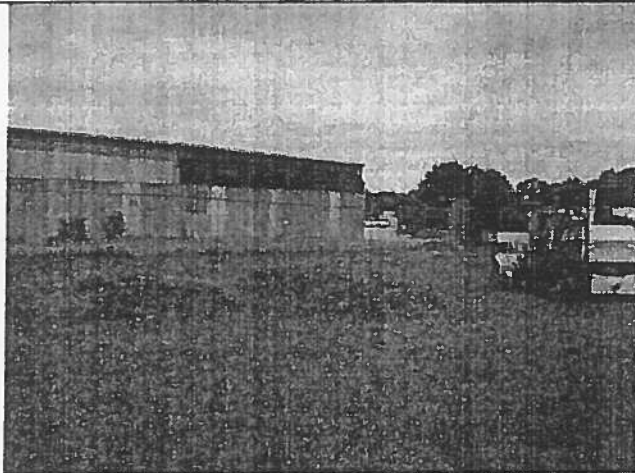
28. Floor drain in garage



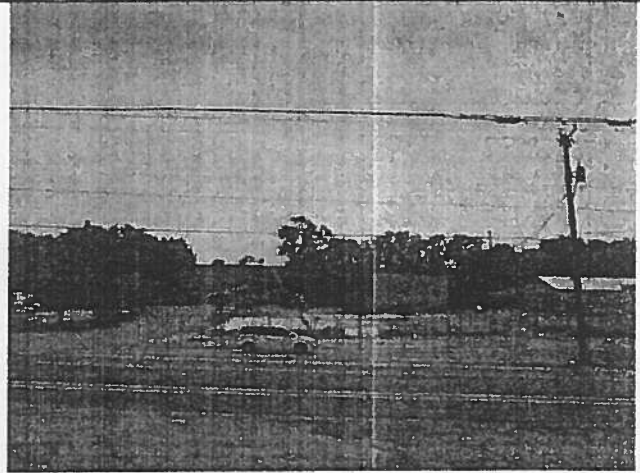
29. Waste oil storage near door in garage



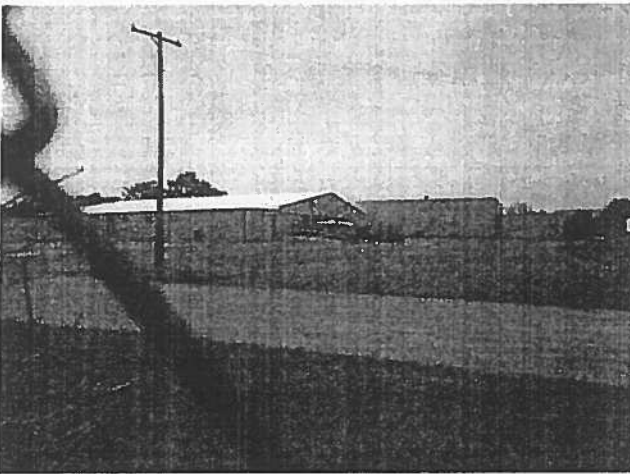
30. Waste oil manifest



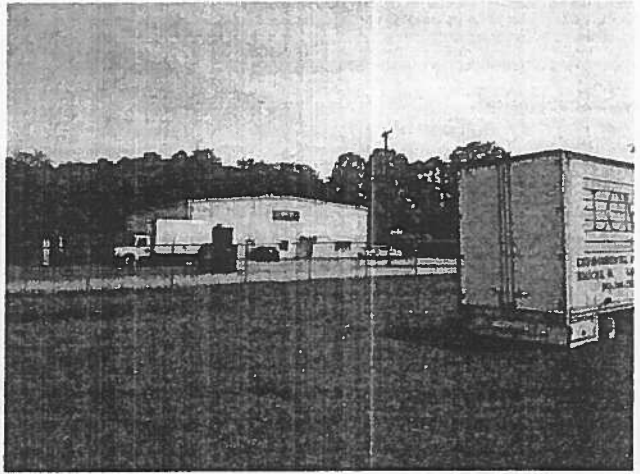
31. Adjacent north, CSE Inc.



32. Adjacent south, demolition site



33. Adjacent west, Aireco Supply



34. Adjacent east, Gemaire Distribution

Appendix C Supporting Documentation