

FINAL

**Phase I Environmental Site Assessment
Ghost Creek Abandoned Drums
Holy Cross, Alaska**

**Prepared for:
Yukon River Inter-Tribal Watershed Council**

URS Job No. 26219848

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LIST OF ACRONYMS

AAI	All Appropriate Inquiry
ADEC	Alaska Department of Environmental Conservation
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
BIA	Bureau of Indian Affairs
DOD	Department of Defense
EDR	Environmental Data Resources
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
PCB	Polychlorinated biphenyls
URS	URS Corporation
YRITWC	Yukon River Inter-Tribal Watershed Council

PHASE I ENVIRONMENTAL SITE ASSESSMENT

SITE NAME **GHOST CREEK ABANDONED DRUMS**

LOCATION **HOLY CROSS, ALASKA**

PROJECT NO.: **26219846**

SITE INSPECTOR **KAREN BROWN**

SITE ESCORT **CHARLENE STERN, YUKON RIVER INTER-TRIBAL
WATERSHED COUNCIL, BROWNFIELD PROGRAM MANAGER**

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On August 13 and 14, 2007, URS Corporation (URS) conducted a Phase I Environmental Site Assessment (ESA) of the Ghost Creek Abandoned Drums in Holy Cross, Alaska (“subject property”). The Phase I ESA was prepared for the Yukon River Inter-Tribal Watershed Council (YRITWC) (Client).

PURPOSE

The purpose of the Phase I ESA is to gather information about the subject property and surrounding areas to evaluate whether environmental concerns exist in association with the subject property and the immediately neighboring properties.

SCOPE AND METHODOLOGY

The scope of services consisted of visual observation of site conditions during a site visit performed by Karen Brown on August 13 and 14, 2007; review of readily available information on historical site usage, surface and subsurface conditions; and information provided by individuals, public agencies and others. The specific scope of services is detailed in URS’ proposal to the YRITWC (Proposal No. 03045258), dated July 2, 2007.

VALIDITY

This report was prepared in general conformance with the United States Environmental Protection Agency (EPA) 40 CFR Part 12 *Standards and Practices for All Appropriate Inquiries (AAI) – Final Rule* approved November 1, 2005, and the American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments (Standard E 1527-05)* approved November 18, 2005. The following components of this report become outdated after one hundred and eighty (180) days of the date of this report and will need to be updated if the subject property has not been acquired within that period of time:

1. Interviews with village residents, owners, operator and occupants;
2. Searches for recorded environmental lien records;
3. Reviews of federal, tribal, state, and local government records;
4. Visual inspection of the property and of adjoining properties; and
5. The declaration of the environmental professional responsible for the assessment or update.

SITE ACCESS LIMITATIONS

URS did not have access limitations during the site visit. However, some parts of the property were not visible because of tall, shoulder-high grass.

SITE DESCRIPTION

Site Location & Description

The subject property is located on Ghost Creek Road in Holy Cross, Alaska. A Site Vicinity Map is presented as Figure 1. The property is adjacent to Walker Slough and the Yukon River and is owned by the heirs of James A. Walker. The subject property is located in Section 35, Township 25 North, Range 57 West, Seward Meridian.

Size

The parcel owned by the heirs of James A. Walker consists of 22.45 acres; however, inspection of the entire parcel was not included in the scope of this Phase I ESA. The subject property referred to as “Ghost Creek Abandoned Drums” included the portions of the Walker property where drums currently or historically were stored. The area inspected during the visit was less than ½-acre in size and is shown on Figure 2.

Current Use of the Property

James L. (Jimmy) and Darryl Walker currently reside on the subject property. A fish camp north of the current drum stockpile location along Walker Slough is sometimes used. No commercial activities reportedly occur on the property.

Descriptions of Structures, Roads, Other Improvements on the Site

The property was transferred under U.S. Survey No. 2223 as an Indian Allotment of James A. Walker in 1934. His grandsons, Darryl and Jimmy Walker, both currently reside in homes on the subject property. Other structures on the property are houses and storage buildings. Ghost Creek Road runs roughly adjacent to Ghost Creek on the Walker property. A gravel/dirt driveway connects the various areas and structures on the property.

A Site Plan is presented as Figure 2, and shows the location of the current and former drum stockpile areas and the approximate area inspected around the drums. Photographs taken during the site inspection are included in Appendix A.

Properties Surrounding the Site/Current Uses of Adjoining Properties

URS observed the following features on the Walker property in the areas surrounding the drum disposal site the time of the site visit.

- North: Vacant land, then a house is located approximately 100 yards from the drum storage location
- South: Vacant land, then solid waste pile including rusting metal equipment
- East: Vacant land, then a fish camp that is used periodically, then Walker Slough
- West: Vacant land

SITE HISTORY

Client-Provided Information

As part of AAI, additional inquiries are required to be conducted by the Client. These inquiries include:

1. Identification of environmental liens or activity and use limitations currently recorded against the subject property;
2. Specialized knowledge or experience regarding the subject property;
3. Commonly known or reasonably ascertainable information regarding the subject property; and
4. Degree of obviousness of the presence or likely presence of contamination at the subject property.

A copy of the AAI Questionnaire is provided in Appendix B.

Chain-of-Title Search

The chain of title search was provided by YRITWC. The property was transferred under U.S. Survey No. 2223 as an Indian Allotment of James A. Walker in 1934 by the Department of Interior, Bureau of Land Management. At James A. Walker's death, the property transferred to Mary Walker and subsequently to other heirs. Currently the property is owned by the heirs.

Environmental Liens

YRITWC requested reasonably ascertainable recorded land title records and lien records to identify any environmental liens or activity and use limitations that are currently recorded against the subject property. According to YRITWC, no environmental liens were identified for the property.

Property Purchase Price

Ms. Stern reports that no commercial real estate transaction is planned for the subject property; therefore, no purchase price is assigned.

Reason for Performing Phase I ESA

The Holy Cross Traditional Council requested a Phase I ESA through the YRITWC to determine the potential environmental risks that may be associated with the drum stockpile.

Historic Use Information

Based on the documents reviewed and interviews with Charlene Stern, Jimmy Walker, and Darryl Walker, a barge and fuel hauling business was once operated by James A. Walker on the subject property. The business once used the drums to deliver fuel to Bureau of Indian Affairs (BIA) schools along the Yukon River. The drums were obtained as military surplus. Ms. Stern believes the drums originated from the Air Force Base located in nearby Galena, Alaska. Some of the drums are marked Project Mona Lisa which she notes was the original code name for annual resupply of Air Force remote sites in Alaska. The property was used to store the drums, but filling of the drums occurred off site away from the Village of Holy Cross at Railroad City. The business is no longer operated. According to the Darryl Walker, business records no longer exist.

Specialized Knowledge

The YRITWC representative, Charlene Stern, provided specialized knowledge and experience related to the subject property relevant to this Phase I ESA. Ms. Stern reports the subject property was formerly occupied by a barge/fuel hauling business and residences, and was used for subsistence. The barge/fuel hauling business is no longer in operation. According to Jimmy and Darryl Walker, no business records exist thus the exact dates of operation are unknown. Jimmy and Darryl Walker reside on the property. The YRITWC Brownfields Survey Guide for a site inventory was provided by Ms. Charlene Stern. According to the document, past practices of the barge/fuel hauling business included the emptying of residual amounts gasoline and diesel from drums directly on to the ground surface. The potential area impacted by the emptying of the drums was estimated at 5 acres; however, Darryl Walker says he has no

knowledge of a spill that size, but did confirm that fuel was discharged on the ground at the original stockpile location shown on Figure 2.

Commonly Known Information

The Client identified Jimmy and Darryl Walker as residents of the property who were aware of the past uses of the subject property including operation of the barge/fuel business and the current use of the subject property including the storage of drums.

Obvious Indicators

Ms. Stern performed the initial site inventory, and noticed stressed vegetation in the area where the drums are currently stored. The vegetation did not appear stressed during the URS site visit in August 2007. URS did not find visual evidence of fuel contamination at the current or former drum storage site. No petroleum hydrocarbon odors were noted at either location. Both areas are heavily vegetated, and the ground was not visible in most locations. Darryl and Jimmy Walker both report the dumping of excess fuel on the ground at the former storage location and on the shores of Walker Slough. Both also have observed visual evidence of petroleum sheens on Ghost Creek during high water and at other locations on the property.

Historic Topographic Maps

URS reviewed United States Geological Survey topographic maps of the subject property for the years 1952 and 1988. Copies of the historic topographic maps are provided in Appendix C.

- 1952: Holy Cross and Walker Slough are depicted on the map.
- 1988: Holy Cross, Walker Slough, and Gost [sic] Creek, are depicted on the map.

Historic Sanborn Maps

URS requested historic Sanborn Fire Insurance Maps from Environmental Data Resources, Inc. (EDR); however, coverage of the subject property area was not available. A copy of the no coverage letter is provided in Appendix D.

Aerial Photographs

URS reviewed aerial photographs for the years 1983, 2001, and 2006 from Aero-Metric, Inc. Available aerial photographs taken before 1983 did not include the Ghost Creek area. Copies of the aerial photographs are included in Appendix E.

- 1983: Multiple structures appear on the subject property. The abandoned drums are located in their present position near Darryl Walker's residence. There are numerous other drums stored at various locations on the property. Many more drums are visible in the photograph than were observed during the site visit at the current stockpile location.
- 2001: Multiple structures appear on the subject property. The stockpile of drums, still in their present location, has dwindled, and the solid waste stored south of the drums is visible.
- 2006: The vegetation in the photograph is more abundant than in the earlier photographs. However, the stockpile of drums is still visible.

City Directory

City directories (Polks or Hill Donnelly) are not available for Holy Cross.

Current Site Operations

Jimmy and Darryl Walker currently reside on the subject property. A fish camp north of the current drum stockpile location along Walker Slough is sometimes used. No commercial activities reportedly occur on the property.

REGULATORY REVIEW

Standard Environmental Record Sources

A database search was ordered from EDR (Appendix F). The databases searched and their respective search radii are as follows:

Databases Searched to 1-Mile Radius

- National Priorities List (NPL) database.
- Proposed National Priorities List (Proposed NPL) database.
- Delisted National Priorities List (Delisted NPL) database.
- RCRA corrective actions (CORRACTS) database.
- Hazardous Sites Cleanup Act (SHWS) database.
- Superfund Consent Decrees (CONSENT) database.
- Records of Decision (ROD) database.
- Department of Defense (DOD) database.
- Former Manufactured Gas (Coal Gas) database.
- Indian Reservations (INDIAN RESERV)

Databases Searched to 1/2-Mile Radius

- Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) database.
- Resource Conservation and Recovery Act (RCRA-TSD). RCRA-TSD facilities treat, store, and/or dispose of hazardous waste.
- Leaking Underground Storage Tanks (LUSTs) database.
- Solid Waste Facility Directory (SWLF) database.
- Voluntary Cleanup Program (VCP) database.
- A listing of Brownfields Sites (US BROWNFIELDS) database.
- Abandoned Landfill Inventory (HIST LF) database.
- LUST sites on Indian Land (INDIAN LUST).
- Unregulated Leaking Storage Tank Cases (UNREG LTANKS).

Databases Searched to 1/4-Mile Radius

- CERCLIS No Further Remedial Action Planned (CERCLIS-NFRAP) database.
- RCRA registered large (LQG) or small generators (SQG) of hazardous waste databases.
- Registered Underground Storage Tanks (UST) database.
- Aboveground Storage Tanks (AST) database.
- RCRA (Violations) and enforcement actions database.
- Mines Master Index File (MINES) database.
- Brownfields Institutional Controls (INST Control) database.
- USTs on Indian Land (INDIAN UST).
- Historic Gas Stations (Historical Auto Stations).
- Historic Dry Cleaners (Historical Cleaners).

Target Property

- Emergency Response Notification System of Spills (ERNS) database.
- Facility Index System/Facility Identification Initiative Program Summary Report (FINDS) database.
- Hazardous Materials Information Reporting System (HMIRS) database.
- Material Licensing Tracking System (MLTS) database.
- Federal Superfund Liens (NPL Liens) database.
- PCB Activity (PADS) database.
- RCRA Administrative Action Tracking System (RAATS) database.
- Toxic Release Inventory (TRIS) database.
- Toxic Substance Control Act (TSCA) database.
- Section 7 Tracking Systems (SSTS) database.
- Federal Insecticide, Fungicide & Rodenticide Act/Toxic Substances Control Act Tracking System (FTTS) database.

On-Site Database Review

The Ghost Creek abandoned drums were not identified on any of the databases reviewed, except the U.S. Department of Defense (DoD), Native American Environment Tracking System. Ms. Stern reports that YRITWC was instrumental in having the sited listed on the tracking system, and that the DoD is currently conducting a Step 1 investigation into the origin of the steel drums.

Adjacent Properties Database Review

No adjacent properties were identified on any of the databases reviewed.

Site Vicinity Database Review

Within Holy Cross four State Hazardous Waste Sites were identified. The Holy Cross Oil Co., Holy Cross Lift Station, ADOT&PF SREB – Holy Cross Airport, and the Shageluk Tank Farm. The Shageluk Tank Farm is located in the Village of Shageluk. The Holy Cross Oil Company is on Airport Road; and the ADOT&PF SREB site is located at the airport. The Holy Cross Lift Station is located at the Alaska Village Electric Cooperative Tank Farm. All sites are located over one-mile from the Walker property.

Unmapped Sites

The EDR report identified the above four sites as unmappable; however, at the time of the site visit URS did observe these facilities as being located over one-mile from the Walker property.

Local Agencies

The Alaska Department of Environmental Conservation (ADEC) lists three contaminated sites for Holy Cross. The Holy Cross Oil Co., Holy Cross Lift Station, and the ADOT&PF SREB site.

INTERVIEWS

Ms. Charlene Stern with YRITWC identified individuals who were aware of the past uses of the subject property. Based on interviews with Ms. Stern, and property residents Darryl and Jimmy Walker, who have past and present knowledge of the site.

James A. Walker, ran a barge business from the property. The barge business acquired the steel drums as surplus from the U.S. Air Force. The drums were used to fulfill a BIA contract to deliver diesel fuel to village schools along the Yukon River. Jimmy and Darryl Walker stated they have no business records, and therefore, do not have a copy of the contract. The drums were filled at Railroad City, a different location on the Yukon River. The drums were abandoned at the site by Mr. James A. Walker. As far as his grandsons remember, the drums were empty when they were stockpiled at the subject property. They report diesel spills at the original storage site of the drums. Both described the practice of dumping fuel

from the drums on the ground on the shores of Walker Slough and at the former drum storage location. No odors were noted at the original storage site, and no visual evidence of contamination was found. The site was heavily vegetated.

YRITWC provided URS with a Brownfields Survey Guide for a Site Inventory dated May 9, 2007. The site inventory documents an interview conducted with Darryl Walker regarding the subject property. The document notes site ownership, environmental conditions, and potential cleanup and reuse. URS found that generally the notations made in the document were consistent with the conditions noted on site during the assessment except groundwater wells were reported by both Jimmy and Darryl Walker to be free of contaminants. Also, Darryl Walker reported that the spill area was not five acres.

Restoration

No information regarding prior restoration activities conducted at the subject property was provided to URS. Neither Jimmy nor Darryl Walker reported any cleanup activities.

SITE RECONNAISSANCE

Visual observation of site conditions was conducted during a site visit performed by Karen Brown on August 13 and 14, 2007. No odors were noted at the original or current drum storage locations, and no visual evidence of contamination was found. The site was heavily vegetated. Shoulder high grass prevented the observation of many areas surrounding the former and current drum storage locations. Several drums were found on various areas of the property, but tall grass obscured the view.

Topography

The general topographic gradient is generally north-northeast.

Groundwater

Groundwater flow direction is likely toward the north toward the Ghost Creek, Walker Slough, and the Yukon River. Actual flow direction has not been confirmed.

Surface Water

Ghost Creek and Walker Slough are the closet waterbodies. Ghost Creek and Walker Slough are located downgradient to the north-northeast of the subject property. Surface water is assumed to drain from the vicinity of the current and former drum stockpile locations to the north-northeast following the topography of the land.

Soils

According to EDR, the soils on the subject property appear to be histic pergelic cryaquepts (peat). Soil surface and surficial soils are silt loam, and deeper soils are stratified very gravelly sand.

Geology

Geology is unknown.

Polychlorinated Biphenyls

URS did not observe polychlorinated biphenyls (PCBs) or likely PCB containing equipment near the current or former drum stockpile locations.

Asbestos Containing Material

At the time of the site visit, URS did not any materials that may contain asbestos near the current or former drum stockpile locations.

Radon

Holy Cross and Ghost Creek are located in the Federal Environmental Protection Agency Radon Zone 3 for Yukon-Koyukuk County. EDR did not report radon for the site.

Lead Based Paint

URS did not observe any painted surfaces or paint containers near the current or former drum stockpile locations. Drums labels were stenciled with paint the age of which is unknown.

Hazardous Materials

At the time of the site visit, URS did not observed any hazardous materials at the former and current drum storage locations. The drums were believed to be empty prior to storage. Some drums contain liquid, but is likely rain or surface water.

Hazardous Waste

At the time of the site visit, URS did not observed any hazardous waste at the former and current drum storage locations.

Solid Waste

At the time of the site visit, URS observed solid waste stockpiled south of the current drum stockpile, and in various other areas of the property. Out-of-services barges and an out-of-service trailer were observed near the former drum stockpile location.

Landfills

No landfills are present on the subject site. The City of Holy Cross operates a Class 3 landfill. It is not an ADEC permitted facility. Individuals haul their own refuse to the facility.

Drains/Sumps

At the time of the site visit, URS did not observe drains/sumps near the current or former drum stockpile locations.

Aboveground Storage Tanks and Underground Storage Tanks

At the time of the site visit, URS did not observe aboveground storage tanks (ASTs) or underground storage tanks near the current or former drum stockpile locations. Jimmy Walker has a 50-gallon heating fuel AST adjacent to his house, and Darryl Walker has a 150-gallon heating fuel AST adjacent to his house.

Off-Site Storage Tanks

ASTs storing heating fuel were observed at the private residences near the drum storage sites.

Water Supply/Wells

At the time of the site visit, Darryl Walker uses a well (23-feet deep) to supply drinking water to his home. Jimmy Walker transports drinking water from Holy Cross. Neither owner reports any past or present problems with water quality. The City of Holy Cross' drinking water is derived from a deep well located away from the subject property.

Wastewater

Septic systems are used to remove wastewater from the two residences. These systems are not near the area surveyed around the current and former drum stockpile locations.

Stormwater

URS observed a stormwater culvert under Ghost Creek Road and a drainage ditch on the Walker Property. A drum was observed near the standing water in the ditch. No petroleum odors were noted, and no visual evidence of petroleum hydrocarbons was observed in the ditch. Ghost Creek Road runs roughly adjacent to Ghost Creek on the Walker property. No petroleum odors were noted, and no visual evidence of petroleum hydrocarbons was observed in the creek.

The area is relatively flat with a slight gradient toward Walker Slough.

Air Emissions

URS did not observe equipment/operations at the site assessment locations that would appear to require an air emissions permit.

Heating/Cooling

There is no heating/cooling at the former and current drum storage locations.

INVESTIGATION FOR SPECIAL RESOURCES**Floodplains and Wetlands**

Holy Cross is located on the Yukon River. The Ghost Creek abandoned drum site is located adjacent to Walker Slough off the Yukon River. Ghost Creek runs through the property.

Federal Emergency Management Agency flood zone data is not available for the subject property. The U.S. Army Corps of Engineers Flood Hazard Data lists the subject property as within the floodplain (USACE 2007). One flood has been recorded for the Yukon River at Holy Cross. The flood of record occurred in 1971. The estimated elevation of the flood was 7.0 feet. Darryl and Jimmy Walker report that portions of the property flood each year during high water, and that the drums were scattered by floodwaters. They were uncertain of the exact year, but believe it was during the 1971 flood.

National Wetland Inventory digital maps are not available for the site.

DATA GAPS

URS identified lack of business records identifying the source of the drums and the disposition of fuel that was carried in the drums as a significant data gap.

FINDINGS

Based on the information provided, this assessment revealed several recognized environmental conditions in connection with the subject property. URS makes the following observation:

- Approximately 160 to 200 steel drums were estimated to be present in various locations at the site.
- Most of the drums observed appeared to be empty.
- Several of the drums at the current stockpile location contained liquid that is believed by URS to be rainwater.
- Residence of the property reported that the drums were empty prior to their being stockpiled on the property.
- Residence of the property reported that the drums were military surplus and used by James A. Walker in his fuel transport/barge business which operated on the property in the past.
- The drums were used to transport fuel from Railroad City (not located at the site or in the village of Holy Cross) to BIA schools along the Yukon River.
- Current residence described the practice of dumping residual fuel from the drums on the ground.

- No visual evidence was observed of fuel spills in the areas surrounding the former and current drum stockpile locations, and no odors were noted at either location. Shoulder high vegetation obscured the view.
- James A. Walker is deceased, and the business was not operated after his death.
- The drums were never disposed properly.

CONCLUSIONS

URS performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice Standard E 1527-05 for the Ghost Creek Abandoned Drums in Holy Cross, Alaska. URS identified the absence of business records as a significant data gaps during the review of historic uses of the subject property. YRITWC provided the title search for this report. Years of operations, disposition of fuel, ownership of drums, information on cleanup or restoration activities that may have taken place were not available because of the lack of records.

URS did not find any evidence of fuel contamination on the portion of the property in the immediate vicinity of current and former drum storage locations on August 13 and 14, 2007. URS did not observe sheens on Ghost Creek. Views of the subject property were obscured by shoulder high vegetation.

We recommend conducting further investigations at the site.

To receive liability protection, in addition to conducting AAI, the owner has the continued obligation of:

- Taking steps to stop new or continued releases;
- Providing cooperation, assistance, and access to EPA, State, or other parties conducting response actions or natural restoration of the property; and
- Complying with CERCLA information requests and subpoenas.

RECOMMENDATIONS

As requested by YRITWC, recommendations on conducting further investigations are provided under separate cover.

REFERENCES

1. Aerial photographs for the years 1983, 2001, and 2006 provided by Aero-Metric, Inc.
2. Historic topographic maps for the years 1952 and 1988 provided by Environmental Data Resources, Inc.
3. EDR Radius Map Report with Geocheck, Environmental Data Resources, Inc., Inquiry No. 1988835.6s, dated July 25, 2007.
4. EDR Certified Sanborn Map Report, Environmental Data Resources, Inc., Inquiry No. 1988835.7, dated July 25, 2007.
5. Ms. Charlene Stern, Brownfield Project Manager, Yukon River Inter-Tribal Watershed Council.
6. Mr. Jimmy Walker, Resident of the James A. Walker Indian Allotment.
7. Mr. Darryl Walker, Resident of the James A. Walker Indian Allotment.
8. U. S. Army Corps of Engineers Flood Hazard Data does available at: (www.poa.usace.army.mil/en/ca/fld_arctic_village.htm), viewed on August 16, 2007.

LIMITATIONS

URS has performed the scope of work set forth in the proposal(s) related to this project, as they may have been amended (the "Proposals"), in specific reliance on the understandings and agreements reached between URS and the Yukon River Inter-Tribal Watershed Council ("Client") as reflected in the Proposals and the written agreement between URS and YRITWC (the "Agreement"). URS' scope of work was limited to that stated in the Proposals. Without limiting the generality of the foregoing, and to insure that there are no misunderstandings regarding the scope of URS' activities, be advised that the

Scope of Work did not include indoor air quality issues nor structural, electrical or mechanical issues, radon survey, asbestos sampling, wetlands assessments, or other activities not expressly described in the Proposal or in URS' report, if any for the work.

The report and any other information which URS prepared and submitted to YRITWC in connection with this project (collectively, the "Reports") are for the sole use and benefit of Client, its affiliates, and any lender providing financing for the acquisition of the subject property and their respective affiliates, successors, and assigns, and may not be used or relied upon by any other person or entity without the prior written consent of YRITWC and URS. Any such consent given by URS shall be deemed to be and shall be subject to the terms and conditions of the Proposals and the Agreement, including without limitation, the warranty, liability and indemnity terms thereof, and any person given such consent (the "Grantee") shall be deemed to have agreed to such terms and conditions by its use and reliance on the Reports. Such Grantee must also agree not to reveal the contents of the Reports to any other person or entity without the prior written consent of both Client and URS.

URS' services in the development of this report were conducted, within the limits prescribed by the Agreement, in a manner consistent with that level of care and skill ordinarily exercised by members of the same professions currently practicing in the same locality under similar conditions and no other guaranty, warranty, or representation, either express or implied, is included or intended herein.

Client recognizes and agrees that:

1. The information in the Reports relates only to the properties specifically described in the Proposals and Reports;
2. The information and conclusions provided in the Reports apply only to the subject properties as they existed at the time of URS' site examination. Should site use or conditions change or should there be changes in applicable laws, standards or technology, the information and conclusions in the Reports may no longer apply;
3. URS makes no representations regarding the value or marketability of these properties or their suitability for any particular use, and none should be inferred based on the Reports;
4. The Reports are intended to be used in their entirety and no excerpts may be taken to be representative of the findings of this investigation.

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 this part.

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 with the following exception: title searches were performed by YRITWC and the information was provided to URS.

Copies of the resumes of those involved in the preparation of this report are provided in Appendix G.

This report was prepared by:
URS CORPORATION

Karen Brown
Environmental Scientist

This report was reviewed by:
URS CORPORATION

Mark Vania
Environmental Scientist