



Phase I Environmental Site Assessment

**92.79-Acre Property
Northwestern Avenue
Village of Caledonia, Wisconsin 53126**



Prepared for:

Zilber Property Group
710 North Plankinton Avenue, Suite 1100
Milwaukee, Wisconsin 53203

Prepared by:

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821 Corporate Court
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December 14, 2021

PSI Project Number: 00542454

A handwritten signature in black ink that reads "Benjamin Berg".

Benjamin Berg
Environmental Professional

A handwritten signature in black ink that reads "Laura Larson".

Laura Larson, PG (IL)
Principal Consultant

Phase I ESA Summary Table

Professional Service Industries, Inc. (PSI), an Intertek company, performed a Phase I ESA of the 92.79-Acre Property located south of Northwestern Avenue, in Village of Caledonia, Wisconsin 53126. PSI performed the assessment to comply with the contract between Zilber Property Group (the client) and PSI.

Our assessment did not include evaluation of BERs that are beyond the scope of ASTM E1527 (ASTM non-scope services, such as asbestos, mold, lead-based paint, radon, wetlands, etc.).

Report Section		No Issues Identified	REC	CREC	HREC	VEC	De-minimis	BER Issue	Notes
3.0	USER-PROVIDED INFORMATION	✓							
5.2	SUBJECT PROPERTY OBSERVATIONS	✓							
5.3	OFF-SITE OBSERVATIONS	✓							
6.0	HISTORICAL USES	✓							
7.0	ENVIRONMENTAL REGULATORY RECORDS REVIEW	✓							
8.0	VAPOR ENCROACHMENT SCREENING	✓							

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LIST OF COMMONLY USED ACRONYMS AND ABBREVIATIONS

ACM	Asbestos-Containing Material
AHERA	Asbestos Hazard Emergency Response Act
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number (also referred to as a PIN)
AST	Above-Ground Storage Tank
ASTM	American Society for Testing and Materials
AUL	Activity & Use Limitation
BER	Business Environmental Risk
Bgs	Below the ground surface
BTEX	Benzene, Toluene, Ethylbenzene, Xylenes
CERCLA	Comprehensive Environmental Response, Compensation & Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation & Liability Information System (now called SEMS)
CESQG	Conditionally Exempt Small Quantity Generator of Hazardous Waste (now called VSQG)
CFR	Code of Federal Regulations
COC	Chemical(s) of Concern
CREC	Controlled Recognized Environmental Condition
CWA	Clean Water Act
EDR	Environmental Data Resources, Inc.
EP	Environmental Professional
EPA	U.S. Environmental Protection Agency
ERIS	Environmental Risk Information Services, Inc.
ESA	Environmental Site Assessment
ESs	Enforcement Standards
FEMA	Federal Emergency Management Agency
FOIA	Freedom of Information Act
HREC	Historical Recognized Environmental Condition
HUD	U.S. Department of Housing & Urban Development

HVAC	Heating, Ventilation & Air Conditioning System
LAST	Leaking Above-Ground Storage Tank
LBP	Lead-Based Paint
LLP	Landowner Liability Protection
LQG	Large Quantity Generator of Hazardous Waste
LUST/ LST	Leaking Underground Storage Tank
MCL	Maximum Concentration Level
mg/kg	Milligrams per Kilogram
mg/L	Micrograms per liter
mg/L	Milligrams per Liter
MSDS	Material Safety Data Sheet (now called Safety Data Sheet (SDS))
MTBE	Methyl Tert-Butyl Ether
ND	Not Detected
NFA	No Further Action (also called No Further Remediation (NFR))
NOV	Notice of Violation
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List (a.k.a. Superfund)
NRCS	Natural Resources Conservation Service
NWI	National Wetlands Inventory
OSHA	U.S. Occupational Safety & Health Administration
PAH	Polynuclear (Polycyclic) Aromatic Hydrocarbons
PALs	Preventative Action Limits
PCB	Polychlorinated Biphenyl
PCE	Perchloroethylene (also called Tetrachloroethylene)
pCi/L	Picocuries per Liter
PFAS	Per & Polyfluoroalkyl Substances
PFOA	Perfluorooctanoic Acid
PFOS	Perfluorooctanesulfonic Acid

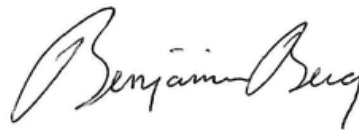
ppb	Parts per Billion
ppm	Parts per Million
RBCA	Risk-Based Corrective Action
RCLs	Residual Contaminant Levels
RCRA	Resource Conservation & Recovery Act
REC	Recognized Environmental Condition
RFI	Request for Information
SF	Square Feet
SQG	Small Quantity Generator of Hazardous Waste
SSURGO	Soil Survey Geographic Database
TCE	Trichloroethylene
TPH	Total Petroleum Hydrocarbons
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish & Wildlife Service
USGS	U.S. Geological Survey
UST	Underground Storage Tank
VEC	Vapor Encroachment Condition
VES	Vapor Encroachment Screening
VIC	Vapor Intrusion Condition
VOC	Volatile Organic Compound
WDNR	Wisconsin Department of Natural Resources
WI DATCP	Wisconsin Department of Agriculture, Trade & Consumer Protection

CERTIFICATION

PSI, an Intertek company, has completed a Phase I ESA of the 92.79-Acre Property located south of Northwestern Avenue in Village of Caledonia, Wisconsin ("the subject property"). PSI performed the Phase I ESA in conformance with ASTM E1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (the Practice). The assessment was completed at the request of Zilber Property Group ("the client") in accordance with the scope of work outlined in PSI's Proposal Number 0054-359158, which was authorized by the client on November 18, 2021.

The conclusions developed herein represent our professional judgment based on information and data available to us at the time of the assessment, and observations made at the time of our site reconnaissance. In accordance with ASTM E1527-13 § 4.6, the report is valid for a period of 180 days from the time of issuance.

Site Assessor:

Handwritten signature of Benjamin Berg in black ink.

Benjamin Berg
Environmental Professional

Reviewed by:

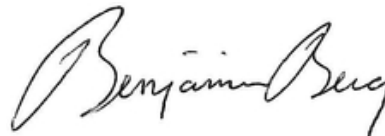
Handwritten signature of Laura Larson in black ink.

Laura Larson, PG (IL)
Principal Consultant

Environmental Professional Certification

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 312.10 of this part. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Environmental
Professional:

Handwritten signature of Benjamin Berg in black ink.

Benjamin Berg
Environmental Professional



1.0 EXECUTIVE SUMMARY

1.1 FINDINGS

A summary of findings is provided below. The report should be read in its entirety to obtain a more complete understanding of the information provided and to aid in any decisions made or actions taken based on this information.

1.1.1 SUBJECT PROPERTY DESCRIPTION AND CURRENT USE

The irregular-shaped subject property is comprised of two parcels that total approximately 92.79-acres and is located along Northwestern Avenue in the Village of Caledonia (Franksville mailing address), Wisconsin. The subject property is bordered to the south by Northwestern Avenue (also known as County Trunk Highway K) and partially to the west by East Frontage Road. According to the "Franksville, Wisconsin" topographic map, the subject property is located within the Southwest 1/4 of Section 30, Township 4 North, Range 22 East in Racine County. The legal description for the property is appended. More specifically, the subject property is approximately located at 42.77405212 degrees North and 87.94828204 degrees West.

The subject property includes two parcels. The northern parcel is 27.63-acres in size and has the corresponding tax key number of 104-04-22-30-038-000. The southern parcel is 65.16-acres in size and has the corresponding tax key number of 104-04-22-30-047-000. For the purposes of this report, the term 'subject property' is referencing both parcels as one unless otherwise stated.

The subject property is developed as agricultural land for row crop production.

The topography of the subject property is rolling with an overall downward slope to the southwest. The surface drainage of the subject property appears to be mainly via ground infiltration.

No manufacturing or other operations that utilize chemical processes or hazardous materials or petroleum products are performed at the subject property.

1.1.2 ADJOINING PROPERTY DESCRIPTION AND USE

The subject property is located within an agricultural, residential, and commercial setting. No current uses of concern were identified on the adjoining properties. Use of the immediately surrounding properties is summarized in the table below.

Direction	Description of Adjoining Property Use
North	At the time of site reconnaissance observations, the immediately adjoining properties to the north of the subject property included a vacant parcel and a single-family residence. The north adjoining properties beyond Northwestern Avenue includes residential dwellings and vacant parcels that are part of the DeBack Farms Business Park.



Direction	Description of Adjoining Property Use
East	At the time of site reconnaissance observations, the adjoining properties to the east of the subject property included agricultural land for row crops.
South	At the time of site reconnaissance observations, the adjoining properties to the south of the subject property included agricultural land for row crops.
West	At the time of site reconnaissance observations, the immediately adjoining properties to the west of the subject property included two residential properties with associated outbuildings. The west adjoining properties, beyond East Frontage Road, include an American Legion Post, a vacant, vegetated parcel that is undergoing apparent grading activities, and the Blue Beacon Truck Wash.

1.1.3 HISTORICAL USE OF SUBJECT PROPERTY AND SURROUNDING AREA

Historically, the subject property includes agricultural land for row crops and/or vacant, vegetated land from at least 1937 to present. It should be noted that it appears that Northwestern Avenue was historically located on the northern portion of the subject property from at least 1937 to the 1970s, when it was then rerouted to its current location (adjoining to the north).

Historically, the north adjoining properties were developed as agricultural land for row crops and residential dwellings in 1937. From the 1950s to the 1970s, the north adjoining properties included vacant, vegetated parcels and agricultural land. From 1976 to 2015, the north adjoining properties beyond Northwestern Avenue included vacant, vegetated parcels, agricultural cropland, and residential dwellings. From 2017 to present, the north adjoining properties beyond Northwestern Avenue included vacant parcels in the DeBack Farms Business Park, residential dwellings, and vacant, vegetated land.

Historically, the south and east adjoining properties included agricultural land and/or vacant, vegetated land from at least 1937 to present.

The west adjoining properties were developed as an apparent farmstead and agricultural land for row crops from at least 1937 to the 1950s. From the 1960s to 2010, the west adjoining properties included residential dwellings, agricultural land for row crops, and vacant, vegetated land. From 2013 to 2015, the immediately west adjoining properties included residential dwellings. The west adjoining properties beyond East Frontage Road included vacant parcels and an American Legion Post. From 2017 to 2020, the immediately west adjoining properties included residential dwellings. The west adjoining properties beyond East Frontage Road included an American Legion Post and a parcel that may be undergoing filling and/or grading activities. Presently, the immediately west adjoining properties include residential dwellings. The west adjoining properties, beyond East Frontage Road, include an American Legion Post, a vacant parcel, and Blue Beacon Truck Wash.



1.1.4 GOVERNMENTAL RECORDS REVIEW

PSI subcontracted with ERIS to provide a review of governmental database records for spill sites, tanks, hazardous waste handlers, and other facilities of potential concern within proximity to the subject property.

The subject property was not identified as a spill site or regulated facility on the regulatory databases that were searched.

One or more off-site facilities were identified in the database search within the appropriate AMSD and were evaluated by PSI during this assessment. These facilities are discussed in Section 7.1 of this report and the regulatory radius map report is appended.

1.1.5 SIGNIFICANT DATA GAPS

The ASTM E1527 Standard Practice defines a significant data gap as a lack of or inability to obtain information required by the practice that would limit our ability to draw conclusions with regard to RECs in connection with the subject property.

Findings and conclusions are subject to the limitations imposed by Significant Data Gaps. Based on our experience, the information that we gathered and evaluated did not present significant data gaps that affected our ability to identify RECs in connection with the Subject Property.

PSI's findings and conclusions regarding RECs are subject to limitations imposed by significant data gaps. However, based on our experience, the information that we gathered and evaluated did not present significant data gaps that affected our ability to identify RECs in connection with the subject property. While there were no significant data gaps identified, the following data gaps were identified during our assessment:

- PSI was not able to document the historical use of the subject property at intervals of five year or less from 1937 to 2021. However, based on other efforts to gather historical information on the subject property as described in this report, PSI was able to infer subject property usage throughout this time period; therefore, this is not considered to be a significant data gap. This limitation is evaluated on the appended Data Gap Worksheet.
- PSI was not provided with contact information for the subject property's past owners, operators or occupants for interview purposes. PSI was able to infer subject property usage; therefore, this is not considered to be a significant data gap. This limitation is evaluated on the appended Data Gap Worksheet.
- Portions of the subject property were densely vegetated at the time of site reconnaissance, therefore, not allowing full observation of the ground surface. Based on other efforts to gather information on the subject property as described in this report, PSI does not consider this to be a significant data gap. This limitation is evaluated on the appended Data Gap Worksheet.



1.2 CONCLUSIONS

PSI performed a Phase I ESA of the subject property in conformance with the scope and limitations of ASTM Practice E1527-13. Any exceptions to or deletions from this practice are described in Section 2.3 of this report. The following conclusions have been made with regard to evidence of RECs, HRECs, CRECs, VECs, and de minimis conditions in connection with the subject property, as defined in ASTM E1527-13.

1.2.1 RECOGNIZED ENVIRONMENTAL CONDITIONS

A REC, as defined in the ASTM Standard, is the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: due to a release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

This assessment has revealed no evidence of RECs in connection with the subject property.

1.2.2 CONTROLLED RECOGNIZED ENVIRONMENTAL CONDITIONS

The ASTM E1527 Standard Practice defines a CREC as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of a regulatory agency with chemicals of concern allowed to remain in place subject to the implementation of institutional and/or engineering controls to prevent future exposure. In some cases, certain uses or activities (e.g., residential use) may be limited or prohibited on the property.

This assessment has revealed no evidence of CRECs in connection with the subject property.

1.2.3 HISTORICAL RECOGNIZED ENVIRONMENTAL CONDITIONS

The ASTM Standard Practice defines a HREC as a past release of hazardous substances or petroleum products that has impacted the property, but the release has been addressed to the satisfaction of a regulatory agency or meets unrestricted use criteria established by the regulatory agency without the need for institutional or engineering controls.

This assessment has not revealed evidence of HRECs in connection with the subject property.

1.2.4 VAPOR ENCROACHMENT CONDITIONS

The ASTM E1527 Standard Practice requires that the environmental professional evaluate the potential for VECs on the subject property. A VEC is defined in ASTM E2600 as the presence or likely presence of volatile chemicals in the subsurface that are caused by the release of vapors from contaminated soil or groundwater either on or near the subject property.

This assessment has not revealed evidence of a VECs in connection with the subject property.



1.2.5 DE MINIMIS CONDITIONS

A de minimis condition is 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.

PSI did not identify any evidence of de minimis conditions on the subject property.

1.3 RECOMMENDATIONS

PSI recommends no further assessment for RECs in connection with the subject property at this time.