



Commercial Real Estate Due Diligence Experts

Phase I Environmental Site Assessment
of
Lakeview Apartments
1105 Edward Street
Fort Valley, Georgia 31030
Velocity Project #EA-25-0700
Loan #506978850

Conducted in accordance with a 06/09/25 Letter Agreement and the ASTM E 1527-21 Standard

Inspection Date: August 27, 2025

Draft Issue Date: September 12, 2025

Final Issue Date: September 19, 2025



Prepared For:

Freddie Mac
8100 Jones Branch Drive
McLean, Virginia 22102

A handwritten signature in black ink, reading "Laura DiGiovanni".

Laura DiGiovanni
Velocity Consulting, Inc.

A handwritten signature in black ink, reading "Santha Wanigasinghe".

Santha Wanigasinghe
Velocity Consulting, Inc.



September 12, 2025

Freddie Mac
8100 Jones Branch Drive
McLean, Virginia 22102

**RE: Lakeview Apartments
1105 Edward Street
Fort Valley, Georgia 31030**

Velocity Consulting, Inc. (Velocity) was engaged by Freddie Mac to conduct a Phase I Environmental Site Assessment (ESA) on the above-referenced property. The Phase I ESA was conducted in accordance with the 06/09/25 Letter Agreement and ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in § 312.10 part of 40 CFR 312. 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. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

A handwritten signature in black ink, reading "Laura DiGiovanni".

Laura DiGiovanni
Environmental Professional

EXECUTIVE SUMMARY

The Executive Summary is a summation of the overall conditions of the property and should not be used as a stand-alone document. This Executive Summary does not contain all of the information that is found in the full Phase I ESA report. The Phase I ESA 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.

Property Description

The subject property is a 10.96-acre parcel developed with an apartment complex comprised of six 2-story apartment buildings and a 1-story construction trailer used as a management office. The property contains a total of 96 apartment units. Other site features include paved parking areas, paved walkways, landscaped areas and two storage trailers. The site improvements were constructed in 1972 and have been used for similar purposes since construction. Prior to 1972, the subject property was undeveloped grassy land.

Conclusions

ASTM Recognized Environmental Conditions (RECs)

Regulatory Database

A USEPA National Priority List (NPL) Database site known as Woolfolk Chemical Works is located as 0.41 miles to the north-northeast of the subject property. This site is a 31-acre former pesticide manufacturer that began operations in 1910. The USEPA placed the site on the NPL in 1990 due to contaminated groundwater and soils resulting from facility operations. Cleanup actions have addressed contamination in the soil, sediments, and the attic dust of nearby residences; however, on-site and off-site groundwater contamination remains. Two separate vapor sampling events at residences near the site determined that, as of 2023, there was no immediate threat to the health of residents. Based on the vapor sampling events and the distance of the site from the subject property, this site does not appear to present a vapor encroachment concern to the subject property. Groundwater contamination is present in four separate aquifer zones with depths that range from approximately 30 to 400 feet below ground surface and extend more than three miles downgradient of the site. The full extent of groundwater contamination is unknown and is currently being investigated and delineated. In 2023-2024, the USEPA installed 36 wells to delineate the large groundwater plume extending from the site, identify potential additional sources of contamination, and to be used during future cleanup efforts. Results from this sampling effort will help develop a better understanding of the extent of the groundwater contamination. Based on maps included in the September 2024 Fifth 5-year Review Report

for the Woolfolk Chemical Works, the extent of the groundwater plumes appear to extend to below the northeastern portion of the subject property and continue to the southeast for over 1.25 miles. A map showing the extent of the groundwater contaminant plume is at the front of Appendix K and a copy of the September 2024 Fifth 5-year Review Report is also in Appendix K. The remedy selected to address the groundwater contamination includes monitoring, containment, treatment, and institutional controls limiting the use of groundwater until performance goals are met. The September 2024 report states the remedy is on-going, and institutional controls have not yet been implemented and will be addressed in the next 5-Year Review report.

Since the groundwater contaminant plume from the Woolfolk Chemical Works NPL site extends beneath the northeastern portion of the subject property, it is a recognized environmental condition (REC). However, since the contamination is at depth (30-400 feet below ground surface), that the contamination does not appear to present a vapor encroachment concern to the subject property, and the subject property utilizes publicly-supplied drinking water, this REC does not present a human health risk to the residents at the subject property. Furthermore, the historical research conducted for this assessment reveals no indication of previous uses that would implicate the subject property as a source of contamination and thus, Velocity is of the opinion that the subject property would not be held liable for cleanup activities for contamination that has migrated beneath the subject property from an off-site source.

ASTM Historical Recognized Environmental Conditions (HRECs)

Velocity's assessment has revealed no evidence of historical recognized environmental conditions in connection with the property.

ASTM Controlled Recognized Environmental Conditions (CRECs)

Velocity's assessment has revealed no evidence of controlled recognized environmental conditions in connection with the property that would warrant further investigation at this time.

Business Environmental Risks (BER) aka Non-ASTM Environmental Concerns

Lead-based Paint

Painted surfaces throughout the inspected portions of the subject property ranged from good to poor condition. The painted surfaces in the occupied units were in good to fair condition with localized areas of damage. The damage in the occupied units is generally limited to areas of water damage or areas where the drywall has contact damage; no areas of significantly peeling paint were observed in the occupied areas. The painted surfaces in the down and vacant units ranged from good to poor condition with many areas of damaged

paint from water, mold, fire, and contact damage. Given the construction date of the site improvements (1972) it is possible that subsurface layers of paint contain lead. Based on Section 61.11 of the Freddie Mac Multifamily Seller/Service Guide, the paint on-site is assumed to be lead-based paint. The areas with damaged paint in the down and vacant units will be addressed as part of the renovation activities to put these units back onto the rental market.

Mold

Areas of mold growth were observed in 13 of the apartments of the inspected apartments (see Section 4.9 for a list of the apartments with mold). The most extensive mold growth are in the vacant and down units, which also suffer from physical and/or fire damage. The source of the mold appears to include prior leaks, water damage, and unoccupied/humid conditions.

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1.0 INTRODUCTION

Freddie Mac (Client) engaged Velocity Consulting, Inc. (Velocity) to perform a Phase I Environmental Site Assessment (ESA) of the property known as Lakeview Apartments, which is located at 1105 Edward Street in Fort Valley, Georgia.

2.0 PROPERTY DESCRIPTION

The subject property is a 10.96-acre parcel developed with an apartment complex comprised of six 2-story apartment buildings and a 1-story construction trailer used as a management office. The property contains a total of 96 apartment units. Other site features include paved parking areas, paved walkways, landscaped areas and two storage trailers.

The site improvements were constructed in 1972 and have been used for similar purposes since construction. Prior to 1972, the subject property was undeveloped grassy land.

No operational activities of environmental significance were observed during Velocity's assessment.

2.1 PROPERTY DATA

LOCATION	
Property Name	Lakeview Apartments
Street Address	1105 Edward Street
City	Fort Valley
County	Peach
State	Georgia
Tax parcel #	F04B 004
STRUCTURE AND BUILDING MATERIALS	
Occupancy Type	Multi-Family Residential
Structures On-Site	A total of six 2-story apartment buildings and a 1-story construction trailer used as a management office
Building Size	79,408 square feet (total rentable area)
Date of Construction	1972
Number of Units in Total	96 apartments (total)
Building Construction	Wood-framing on concrete slab foundations
Exterior Construction	Vinyl siding with brick veneer accents and T1-11 siding within the breezeways; exterior breezeways and stairs; flat/low-slope roofs covered with single-ply TPO system
Interior Construction	Drywall walls and ceilings and vinyl tile/vinyl plank and ceramic tile floors
Other Improvements	Parking areas, paved walkways, landscaped areas, and two storage trailers
PHYSICAL CHARACTERISTICS	
Property Shape	Irregular
Property Acreage	10.96 acres

Visibility and accessibility	Accessed and good visibility from Edwards Court
Sources: Peach County tax assessment records Aerial photographs Rent roll from August 2025	

2.2 UTILITIES

The following utilities are provided to the subject property:

Utilities		
Utility	Provider	Issue/Adequacy
Electric	Fort Valley Utility Commission	Adequate
Natural Gas	Fort Valley Utility Commission	Adequate
Water	Fort Valley Utility Commission	Adequate
Sanitary Sewer	Fort Valley Utility Commission	Adequate
Storm Sewer	Fort Valley Utility Commission	Adequate

2.3 AREAS INSPECTED

The site reconnaissance of the subject property consisted of visual and/or physical observations of the property and site improvements. Unimproved portions of the property (if any) were observed along the perimeter and in a general grid pattern in safely accessible areas.

Velocity gained access to the common and mechanical/storage areas, and 24 of the 96 units on the subject property. The units were selected by Velocity prior to the inspection. Based on Velocity's assessment of the units accessed, Velocity determined that the number of units Velocity accessed were an adequate representation of the residential units on-site to identify any potential environmental concerns. The apartments inspected by Velocity are:

Building A1: Units 1, 2, 3
 Building A2: Unit 2
 Building B1: Unit 8
 Building B2: Unit 1
 Building C1: Unit 2
 Building C2: Units 1, 2, 3, 4, 5, 6, 7, 8
 Building D1: Unit 1
 Building D2: Units 3, 5, 7
 Building E2: Unit 4
 Building F1: Units 3, 6
 Building F2: Units 4, 8

A fire occurred at the property in August 2024 that impacted the units at Building C2. Four of the units sustained extensive damage from the fire and the associated firefighting activities. These units will need to be completely demolished (none of the finishes have been removed). There is extensive mold and water damaged throughout these units.

2.4 NEIGHBORING PROPERTY USES

The subject property is located and has frontage on the south side of Edwards Court and the east and west sides of Edwards Road in Fort Valley, Georgia. Edwards Road runs through the subject property. None of the neighboring properties are likely to have had a negative environmental impact on the subject property. The following table summarizes the neighboring property uses:

Neighboring Property Uses			
Direction	Closest Street	Adjoining Property	Further
North	Edwards Court	Vacant grassy land and a grocery store	Apartment buildings, single-family homes, and wooded land
South	Tabor Circle	Apartment buildings and vacant grassy land	Apartment buildings, single-family homes, and wooded land
East	None close	Apartment buildings and wooded land	Single-family homes and wooded land
West	Edwards Street	Apartment buildings	Single-family homes

2.5 PHYSICAL SETTING

Physical setting sources were reviewed to provide information about the topography, groundwater, and soil characteristics at the subject property.

TOPOGRAPHY	
Topography at Subject Property	Slopes downward to the southeast
Average Elevation at Subject Property	500-520 feet above sea level
Topographic Slope of Area	Topography slopes to the southeast in the general vicinity of the subject property
Nearest Surface Water Body	An unnamed lake, which lies 3,775 feet to the southwest
ESTIMATED GROUNDWATER FLOW DATA	
Shallow Groundwater Flow Behavior	Generally, follows topography
Estimated Groundwater Flow Direction	Groundwater flows to the southeast, similar to surface drainage patterns
SOILS DATA	
Soil Classification and (Percent Slopes)	Faceville fine sandy loam (0-2%), Greenville fine sandy loam (2-5%)

Wetlands Data
Evidence of marshy areas or vegetation typical of wetlands was not observed on the subject property.
References The United States Geological Survey (USGS) 7.5-Minute Topographic Quadrangle Map Environmental Risk Information Services Physical Setting Report USGS Fish & Wildlife Service Wetlands Online Mapper (http://www.fws.gov/wetlands/Data/Mapper.html)

3.0 SCOPE OF WORK

Freddie Mac (Client) engaged Velocity Consulting, Inc. (Velocity) to perform a Phase I Environmental Site Assessment (ESA) of the property known as Lakeview Apartments, which is located at 1105 Edward Street in Fort Valley, Georgia. The Phase I ESA is addressed to Freddie Mac. With the exception of the items noted in Sections 3.3 and 3.4 of this report, the Phase I ESA was conducted in accordance with a Letter Agreement between Freddie Mac and Velocity (the Letter Agreement) and the ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527-21 Standard). The scope of work completed was designed solely to meet the needs of Velocity's Client. Velocity shall not be liable for any unintended usage of this report by another party.

3.1 PURPOSE

The purpose of this assessment, as limited by its scope and consistent with good commercial and customary practice, is to assist Freddie Mac in identifying recognized environmental conditions and non-ASTM issues of environmental concern associated with the subject property. This purpose will allow a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser defenses to CERCLA liability and/or to help understand potential environmental conditions that could materially impact the operation of the subject property.

The ASTM E 1527-21 Standard uses the following definitions to this purpose:

Recognized environmental condition: the presence or likely presence of any *hazardous substances* or *petroleum products* in, on, or at a *property*: (1) due to release to the environment; (2) under conditions indicative of a *release* to the *environment*; or (3) under conditions that pose a *material threat* of a future release to the *environment*. *De minimis conditions* are not *recognized environmental conditions*.

Historical recognized environmental condition: a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed in a matter accepted by the applicable regulatory agency (for example, as evidenced by the issuance of a no further action letter or equivalent), without subjecting the property to any *activity and use limitations*.

Controlled recognized environmental condition: a *recognized environmental condition* resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority and that subjects the property to *activity and use limitations*.

Business environmental risk: 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 in this practice. Consideration of business environmental risk issue may involve addressing one or more non-scope considerations, some of which are identified in Section 13 of the ASTM E 1527-21.

Data gap: a lack of or inability to obtain information required by the ASTM E 1527-21 Standard 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 the ASTM E 1527-21 Standard, 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.).

Additional ASTM E 1527-21 Standard definitions and other relevant definitions are provided in Section 7.0.

3.2 SCOPE OF SERVICES

The Phase I ESA was conducted in accordance with the Letter Agreement and the ASTM E 1527-21 Standard. The scope of work includes an evaluation of the risks listed in Exhibit A of the Letter Agreement and the Freddie Mac Multifamily Seller/Service Guide, using the methodology described the Freddie Mac Multifamily Seller/Service Guide. The scope of work completed was designed solely to meet the needs of Velocity's Client. Velocity shall not be liable for any unintended usage of this report by another party.

3.3 SIGNIFICANT ASSUMPTIONS

Velocity relied on information derived from secondary sources including governmental agencies, the client and/or User, designated representatives of the client and/or User, property contact, property owner, property owner representatives, computer databases, and personal interviews. Except as set forth in this report, Velocity has made no independent investigation as to the accuracy and completeness of the information derived from these secondary sources and has assumed that such information is accurate and complete.

An independent data research company provided the Standard Environmental Record Sources Review referenced in this report. Information on surrounding area properties was requested for approximate minimum search distances and is assumed to be correct and complete unless obviously contradicted by Velocity's observations or other credible referenced sources reviewed during the assessment. Velocity shall not be liable for any such database firm's failure to make relevant files or documents properly available, to properly index files, or otherwise to fail to maintain or produce accurate or complete records.

Groundwater flow and depth to groundwater, unless otherwise specified by on-property well data, are assumed based on contours depicted on the United States Geological Survey topographic maps.

Velocity assumes the subject property location has been correctly and accurately identified by the client and/or User, property owner, property manager, Key Site Manager, and their representatives and legal counsel.

Velocity assumes that the client and/or User, property owner, property manager, Key Site Manager, and their representatives and legal counsel, used good faith in answering questions and in obtaining information for the subject property as defined in 10.8 of the ASTM E 1527-21 Standard. This also includes obtaining relevant reports and documents from previous owners, operators, tenants, brokers, financial institutions etc.

Velocity assumes the client has designated appropriate and knowledgeable people as site contacts, including Key Site Managers.

3.4 LIMITATIONS AND EXCEPTIONS

Velocity has prepared this Phase I ESA report using reasonable efforts to identify *recognized environmental conditions* associated with hazardous substances or petroleum products at the property. Findings contained within this report are based on information collected from observations made on the day(s) of the site reconnaissance and from reasonably ascertainable information obtained from certain public agencies and other referenced sources.

As per Sections 4.5.1, 4.5.2, and 4.5.3 of the ASTM E 1527-21 Standard, a Phase I ESA is not an exhaustive investigation of the property and environmental conditions on such property and a Phase I ESA cannot completely eliminate uncertainty regarding the potential for *recognized environmental conditions* in connection with a property. Performance of the Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and this Phase I ESA recognizes reasonable limits of time and cost.

This report is not definitive and should not be assumed to be a complete and/or specific definition of all conditions above or below grade. Current subsurface conditions may differ from the conditions determined by surface observations, interviews, and reviews of historical sources. The most reliable method of evaluating subsurface conditions is through intrusive techniques, which are beyond the scope of this report. Information in this report is not intended to be used as a construction document and should not be used for demolition, renovation, or other property construction purposes. Any use of this report by any party, beyond the scope and intent of the original parties, shall be at the sole risk and expense of such user.

This report is not an environmental compliance survey and Velocity makes no representation or warranty that the past or current operations at the property are, or have been, in complete compliance with all applicable federal, state, and local laws, regulations and codes. Regardless of the findings stated in this report, Velocity is not responsible for consequences or conditions arising from facts not fully disclosed to Velocity during the assessment or from areas that Velocity was not provided access to during the site reconnaissance.

This report is not a Vapor Intrusion Survey.

The limited asbestos survey is not meant to comply with Asbestos Hazard Emergency Response Act (AHERA), 40 Code of Federal Regulations (CFR) Part 763, National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 61, Occupational Safety and Health (OSHA) 29 CFR Part 1926.1101, or other local, state, or federal regulations.

Velocity used reasonable efforts to identify evidence of aboveground and underground storage tanks, ancillary equipment, asbestos-containing materials, mold, and evidence of releases on the property during the assessment. "Reasonable efforts" were limited to observation of accessible areas, review of referenced public records, and interviews. These reasonable efforts are non-destructive and do not include the disassembly or operation of equipment, or a survey of areas hidden from view by walls, ceilings, soffits, etc. These reasonable efforts may not identify subsurface equipment or evidence hidden from view by things including, but not limited to, snow cover, paving, construction activities, stored materials, and landscaping.

Any estimates of costs or quantities in this report are approximations for commercial real estate transaction due diligence purposes and are based on the findings, opinions, and conclusions of this assessment, which are limited by the scope of the assessment, schedule demands, cost constraints, accessibility limitations and other factors associated with performing the Phase I ESA. Subsequent determinations of costs or quantities may vary from the estimates in this report. The estimated costs or quantities in this report are not intended to be used for financial disclosure related to the Financial Accounting Standards Board (FASB) Statement No. 143, FASB Interpretation No. 47, Sarbanes/Oxley Act or any United States Securities and Exchange Commission reporting obligations, and may not be used for such purposes in any form without the express written permission of Velocity.

Velocity is not a professional title insurance or land surveyor firm and makes no guarantee, express or implied, that any land title records acquired or reviewed in this report, or any physical descriptions or depictions of the property in this report, represent a comprehensive definition or precise delineation of property ownership or boundaries.

The Environmental Professional Statement on page 2 of this report does not "certify" the findings contained in this report and is not a legal opinion of such *Environmental Professional*. The *Environmental Professional* Statement is intended to document Velocity's opinion that an individual meeting the qualifications of an Environmental Professional was involved in the performance of the assessment and that the activities

performed by, or under the supervision of, the *Environmental Professional* were performed in conformance with the standards and practices set forth in 40 CFR Part 312 per the methodology in ASTM E 1527-21 Standard and the scope of work for this assessment.

In accordance with the ASTM E 1527-21 Standard, this report is presumed to be valid for a six-month period from the date of the site visit. If the report is older than six months, the following information must be updated in order for the report to be valid: (1) regulatory review, (2) site visit, (3) interviews, (4) specialized knowledge and (5) environmental liens search. Reports older than one year may not meet the ASTM E 1527-21 Standard and therefore, the entire report must be updated to reflect current conditions and property-specific information.

ASTM E1527-21 states that the User of an environmental site assessment may include, without limitation, a potential purchaser of the subject property, a potential tenant of the subject property, an owner of the subject property, a lender, or the manager of the subject property. Per Section 6 of the ASTM E 1527-21 Standard, User Responsibilities, the User of this assessment has specific obligations for performing tasks during this assessment that will help identify the possibility of *recognized environmental conditions* in connection with the property. Failure by the User to fully comply with the requirements may impact their ability to use this report to help qualify for *Landowner Liability Protections* (LLPs) under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Velocity makes no representations or warranties regarding a User's qualification for protection under any federal, state, or local laws, rules, or regulations.

Other limitations and exceptions that are specific to the scope of this report may be found in corresponding sections.

3.5 USE RELIANCE

This report is for the use and benefit of, and may be relied upon by:

- (a) Freddie Mac and any successors and assigns ("Lender");
- (b) independent auditors, accountants, attorneys and other professionals acting on behalf of Lender;
- (c) governmental agencies having regulatory authority over Lender;
- (d) designated persons pursuant to an order or legal process of any court or governmental agency;
- (e) prospective purchasers of the Mortgage; and
- (f) with respect to any debt (or portion thereof) and/or securities secured, directly or indirectly, by the Property which is the subject of this report, the following parties and their respective successors and assigns:
 - any placement agent or broker/dealer and any of their respective affiliates, agents and advisors;
 - any initial purchaser or subsequent holder of such debt and/or securities

- any Servicer or other agent acting on behalf of the holders of such debt and/or securities;
- any indenture trustee
- any rating agency; and
- any institutional provider from time to time of any liquidity facility or credit support for such financings

In addition, this report, or a reference to this report, may be included or quoted in any offering circular, information circular, offering memorandum, registration statement, private placement memorandum, prospectus or sales brochure (in either electronic or hard copy format) in connection with a securitization or transaction involving such debt (or portion thereof) and/or securities.

3.6 DATA GAPS

ASTM E 1527-21 defines a data gap as a lack of or inability to obtain information required by the ASTM standard 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 the ASTM E 1527-21 Standard.

Velocity encountered the following data gaps in preparation of this ESA report:

Data Gap	Reference Section
User questionnaire not completed	4.13.2
Lien search not conducted	4.13.3
Key Site Manager not available for interview	4.7.8

ASTM E 1527-21 defines a *significant data gap* as a data gap that affects the ability of the environmental professional to identify a recognized environmental condition. None of the above-listed data gaps are a significant data gap.

4.0 FINDINGS AND RESULTS

On August 27, 2025, Shini Paul, an Environmental Professional of Velocity, conducted a site reconnaissance of the property. On the day of the site reconnaissance, the weather was partly cloudy and approximately 75 degrees Fahrenheit. Shini Paul was accompanied by Mohammed Azizuddin, a general contractor who is working at the subject property.

The apartments inspected by Velocity are listed in Section 2.3.

4.1 ASBESTOS

Background

Asbestos is a group of naturally occurring fibrous silicate minerals that have been mined for their useful properties such as thermal insulation, chemical and thermal stability, and high tensile strength. Unless it is labeled, asbestos can only be identified by laboratory analysis. When disturbed, asbestos fibers become airborne and may be inhaled into the lungs, where they may cause significant health problems. Although a safe level of exposure to asbestos has not been determined, researchers know the greater and longer the exposure, the greater the risk of contracting an asbestos-related disease. High levels of asbestos exposure can lead to lung cancer, mesothelioma, and asbestosis.

The United States Environmental Protection Agency (USEPA) defines an asbestos-containing material (ACM) as a material that contains greater than 1% asbestos. ACMs are classified as either friable (can be crushed by hand pressure) or non-friable (can not be crushed by hand pressure). Friable ACMs commonly found in structures include thermal system insulation, spray-on fireproofing, and acoustical ceiling tiles. Non-friable ACMs commonly found in structures include vinyl floor tiles, adhesives, and roofing materials.

Velocity performed a limited asbestos survey. The purpose of the limited asbestos survey is to identify readily accessible asbestos-containing materials in representative areas only.

The limited asbestos survey does not include areas that are not readily accessible or are hidden by building components. The limited asbestos survey is not meant to serve as a full asbestos survey or to render a property asbestos-free. The limited asbestos survey complies with Section 61.10 of Chapter 61 of the Freddie Mac Multifamily Seller/Service Guide. The results of the limited asbestos survey are below.

Observations at Subject Property

No friable suspect asbestos-containing (SAC) materials were observed in any of the areas inspected on-site. The following non-friable SAC materials were observed on-site: vinyl floor materials and mastic, plaster/drywall/joint compound, and roofing materials. The SAC materials ranged from good to poor condition. The SAC materials in the occupied units were generally in good to fair condition with some areas of localized damage. The SAC materials in the vacant and down units had many areas that were in poor condition.

Section 61.10(d) of the Freddie Mac Multifamily Seller/Service Guide states that non-friable SAC materials may remain in place. As per the Freddie Mac Multifamily 11/06/17 Bulletin, an Asbestos Operations and Maintenance (O&M) Program is required only if friable asbestos-containing materials remain present following the origination of a loan. Since no friable SAC materials were observed at the subject property, an Asbestos O&M Program is not required and has not been recommended.

The types and location of the SAC materials observed on-site are listed in the table below.

Material	Location	Friable (Y/N)	Condition
Plaster/drywall/joint compound	Throughout the buildings	No	Good to poor
Vinyl floor materials and mastic	Throughout the buildings	No	Good to poor
Roofing materials	Roofs	No	Good with local damage

4.2 HAZARDOUS MATERIALS

4.2.1 CHEMICAL STORAGE AND USAGE

No areas of chemical storage were observed at the subject property.

No 55-gallon drums or unidentified substance containers were observed on-site.

4.2.2 EVIDENCE OF CHEMICAL SPILLS

Velocity identified no evidence of chemical spills or staining in any of the areas inspected on-site. In addition, no visual indication of spills such as stressed vegetation or discolored soil was identified on-site.

4.2.3 WASTE DISPOSAL

4.2.3.1 NON HAZARDOUS SOLID WASTE

No treatment of solid waste was observed on-site.

Solid waste generated by the tenants is stored in dumpsters for collection by the City of Fort Valley. No evidence of improper waste disposal activities was observed by Velocity.

Velocity assumes that the property was graded to construct the site improvements on-site. No areas that are apparently filled or graded by non-natural causes, mounds, or depressions suggesting trash construction debris, demolition debris, or other solid waste disposal was observed on-site.

4.2.3.2 HAZARDOUS WASTE

No hazardous waste is generated on-site.

4.2.3.3 OTHER REGULATED WASTES

No other regulated wastes are generated on-site.

4.2.3.4 SANITARY WASTEWATER

No evidence of sanitary wastewater treatment was observed on-site. The sanitary wastewater generated on-site is discharged into the public sewer system maintained by the Fort Valley Utility Commission. No hazardous or process wastewater is generated on-site. No septic systems were observed on-site. No evidence of improper wastewater disposal activities was observed by Velocity.

4.2.3.5 STORM WATER

Storm water drainage is via sheet flow away from the buildings to the landscaped areas and to catch basin drains in the paved areas. Several drains are installed in parking areas throughout the complex. The on-site drains connect with underground piping to the outgoing sewer mains.

Storm water runoff for the roofs is directed via surface pitch to gutters and down spouts at the roofs of the buildings. The gutters and down spouts discharge to the landscaped areas below.

The subject property did not appear to accept storm water drainage from off-site sources.

Velocity identified no recognized environmental conditions in connection with the storm water management.

4.2.4 ODORS

No strong, pungent, or noxious odors were encountered on-site during Velocity's site visit.

4.2.5 PITS, PONDS, AND LAGOONS

No pits, ponds, or lagoons were observed on-site during the site visit.

4.2.6 WELLS, SUMPS, AND FLOOR DRAINS

No sumps, floor rains, dry wells, irrigation wells, injection wells, water supply wells, monitoring wells or abandoned wells were observed on the subject property.

4.3 STORAGE TANKS

4.3.1 UNDERGROUND STORAGE TANKS

Velocity did not identify evidence of any underground storage tanks (USTs) on-site. No evidence of fill caps, manways, or vent pipes were identified on-site. No saw cuts on paved surfaces, disturbed pavements, or unlabeled manways that are typically associated with USTs were identified on the subject property.

None of the historical records or regulatory databases reviewed suggests the presence of USTs on the subject property.

4.3.2 ABOVEGROUND STORAGE TANKS

Velocity did not identify evidence of any aboveground storage tanks (ASTs) on-site. No evidence of fill caps or vent pipes that are typically associated with ASTs were identified on-site.

None of the historical records or regulatory databases reviewed suggests the presence of ASTs on the subject property.

4.4 LEAD-BASED PAINT

Background

Lead is a highly toxic metal that was used for many years in products found in and around our homes. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. When absorbed into the body through inhalation or ingestion, lead can be highly toxic and is particularly damaging to the neurological development of young children. Ingestion of lead-contaminated surface dust from sources such as damaged paint is the most common pathway of childhood lead poisoning.

The Federal Consumer Product Safety Commission banned lead-based paint from housing in 1978. According to the USEPA, approximately three-quarters of the nation's housing stock built before 1978 (approximately 64 million dwellings) contains some lead-based paint. When properly maintained and managed, this paint poses little risk.

To protect families from exposure to lead from paint, dust and soil, Congress passed the Residential Lead-Based Paint Hazard Reduction Act (also known as Title X) in 1992. Section 1018 of this law directed the Department of Housing and Urban Development (HUD) and the EPA to require the disclosure of known information on lead-based paint and lead-based paint hazards before the sale or lease of most housing constructed before 1978. Title X ensures that renters and purchasers of housing constructed prior to 1978

receive the information necessary to protect themselves and their families from lead-based paint hazards. Title X became effective in 1996 and it is the responsibility of the sellers and lessors to comply with the regulation. It is beyond the scope of work of this ESA to determine whether or not the subject property is in compliance with Title X.

Pursuant to Section 61.11 of the Freddie Mac Multifamily Seller/Service Guide, properties built before 1978 require testing for the presence of lead-based paint. Acceptable forms of testing consist of the collection of chip samples or the use of x-ray fluorescence technology. In the absence of acceptable testing, Section 61.11 of the Freddie Mac Multifamily Seller/Service Guide allows painted surfaces to be assumed to contain lead and be managed with a lead-based paint operations and maintenance program.

Observations at Subject Property

Painted surfaces throughout the inspected portions of the subject property ranged from good to poor condition. The painted surfaces in the occupied units were in good to fair condition with localized areas of damage. The damage in the occupied units is generally limited to areas of water damage or areas where the drywall has contact damage; no areas of significantly peeling paint were observed in the occupied areas. The painted surfaces in the down and vacant units ranged from good to poor condition with many areas of damaged paint from water, mold, fire, and contact damage.

Given the construction date of the site improvements (1972) it is possible that subsurface layers of paint contain lead. No lead paint sampling was conducted on-site. Based on Section 61.11 of the Freddie Mac Multifamily Seller/Service Guide, the paint on-site is assumed to be lead-based paint.

4.5 DRINKING WATER QUALITY

Background

The EPA issued the Lead and Copper Rule for drinking water in 1992. This rule required public water systems to sample and test their drinking water for lead contamination, implement appropriate corrosion control treatments, and replace lead service lines where water samples continue to exceed the EPA's recommended action level for lead. The action level, which applies to both public water systems and residences, was established at 15 micrograms per liter (ug/L). The EPA recommends that the owners of multi-family residential buildings notify their tenants if lead in drinking water levels are found to exceed the action level.

The subject property uses potable water supplied by the Fort Valley Utility Commission. The USEPA maximum allowable level of lead in drinking water is 15 parts per billion (ppb). According to the most recent (dated 2024) Fort Valley Utility Commission Annual Water Quality Report (https://www.fvutil.com/news_242_2937832147.pdf), the drinking water provided to Fort Valley meets current USEPA requirements for lead in drinking water.

4.6 POLYCHLORINATED BIPHENYLS (PCBs)

Polychlorinated biphenyls are mixtures of up to 209 individual chlorinated compounds (known as congeners). PCBs have been used as coolants and lubricants in transformers, capacitors, other electrical equipment and hydraulic systems because they don't burn easily and are good insulators. PCBs were banned in the United States in 1979 because of evidence they build up in the environment and can cause harmful health effects. However, products including transformers, hydraulic compactors, hydraulic lifts, and old fluorescent lighting fixtures made before 1979 may contain PCBs.

The USEPA regulates the use, storage and disposal of PCB and PCB-containing transformers. PCB-containing materials are classified according to the concentration of PCBs present. There are three classifications of PCB-containing materials: PCB materials contain 500 parts per million (ppm) or greater of PCBs, PCB-contaminated material contain between 50 and 500 ppm PCBs, and Non-PCB materials contain less than 50 ppm PCBs.

4.6.1 TRANSFORMERS

Pole-mounted transformers were observed along the property boundaries and a pad-mounted transformers were observed at the subject property. The transformers are free of visible leaks and staining. The transformers are owned and maintained by the local utility, Fort Valley Utility Commission. Typically, any maintenance, leaks or spills from the transformers are the responsibility of the utility.

A representative from Fort Valley Utility Commission verbally acknowledged that the pole-mounted transformers on the subject property are owned and maintained by Fort Valley Utility Commission. A Freedom of Information request has been sent to Fort Valley Utility Commission obtain written verification of the ownership and maintenance of the transformers located on-site. A copy of the FOI letter is in Attachment H.

4.6.2 HYDRAULIC ELEVATORS AND LIFTS

No hydraulic elevators or hydraulic lifts were identified on-site.

4.6.3 HYDRAULIC COMPACTORS

No hydraulic compactors were identified on-site.

4.7 HISTORICAL RECORDS REVIEW

As per the ASTM E 1527-21 Standard, the objective of compiling and analyzing historical property information and developing a history of the previous uses of the subject property, adjoining properties, and surrounding area is to help identify the likelihood of past uses having led to recognized environmental conditions in connection with the subject property.

To meet this objective, and as per Section 61.8 of the Freddie Mac Multifamily Seller/ Servicer Guide, Velocity reviewed reasonably ascertainable standard historical sources in order to determine all obvious uses of subject property, adjoining properties, and surrounding area from the present back to the property's first developed use, or back to 1940, whichever is earlier.

No data gaps, including data failure, were encountered in establishing the historical use of the subject property.

4.7.1 HISTORICAL USES OF SUBJECT PROPERTY

Dates	Property Use
1937-1972	Undeveloped grassy land
1972-Present	Developed as an apartment complex with six apartment buildings

Velocity's review of historical sources did not identify any recognized environmental conditions associated with the subject property.

4.7.2 HISTORICAL USES OF ADJOINING PROPERTIES

The area to the northwest of the subject property has been developed since prior to 1937 with residential properties. The remaining areas were agricultural land and/or orchards until the 1960s when the apartment complexes were constructed to the south. Additional apartment complexes were constructed to the west and south in the 1970s, and to the east in the 1990s. The area to the north has remained undeveloped. Velocity's review of historical sources did not identify any recognized environmental conditions associated with the adjoining properties.

4.7.3 AERIAL PHOTOGRAPHS

Aerial photographs from 1937 to 2023 were obtained from Environmental Risk Information Services. The information from the aerial photography is summarized in the table below.

Copies of the [aerial photographs](#) are in Appendix E.

Aerial Photograph Summary

Year	Subject Property Use	Adjoining Property Uses	Further Uses
1937	Undeveloped grassy land with a few dirt roads	A few dwellings and undeveloped grassy land with a few dirt roads	Residential development to the west and northwest; remaining areas are undeveloped grassy land

Year	Subject Property Use	Adjoining Property Uses	Further Uses
1951	Similar to prior year	Similar to prior year	Similar to prior year with additional residential development to the west and north
1958	An orchard	Residential development to the northwest, undeveloped grassy land to the southwest, and orchards on the remaining adjoining properties	Orchards, residential development and some school and office development
1965	Undeveloped grassy land	Undeveloped grassy land to the north, west, and east; and residential development to the south and northwest	Similar to prior year except orchards are now undeveloped grassy land
1973	Developed with the apartment complex that is currently on-site	Undeveloped grassy land to the north and east; and residential development to the south and west	Similar to prior year with additional residential development
1981	Similar to prior year	Similar to prior year except the food store to the north is present	Similar to prior year
1993	Similar to prior year	Similar to prior year	Similar to prior year with additional residential development
1999	Similar to prior year	Residential development has been constructed to the northeast	Similar to prior year with additional residential development
2005, 2006, 2007, 2009	Similar to prior year	Similar to prior year	Similar to prior year
2010, 2013, 2015, 2017, 2019	Similar to prior year	Similar to prior year	Similar to prior year
2021, 2023	Similar to prior year	Similar to prior year	Similar to prior year

Circa 1958, the subject property and the adjoining properties to the north, east and west were orchards. The orchards were not present on the earlier (1951) and later (1965) aerial photographs. The historical orchard operations may have used fertilizer and pesticides. The subject property was regraded for the current development, and is currently covered with impervious surfaces or covered with landscaping, and no cultivation activities are taking place on-site. In addition, Velocity found no information in the regulatory records

and public sources reviewed showing that the historical orchard uses at the subject property or adjoining sites warranted any investigations or remediation activities. Based on this information, the historical orchard use of the subject property and the adjoining sites do not present an issue of environmental concern to the subject property. The aerial photographs do not show any properties of environmental concern.

4.7.4 SANBORN FIRE INSURANCE MAPS

The Sanborn Fire Insurance maps collection consists of a uniform series of large-scale maps, dating from 1867 to the present, depicting the commercial, industrial, and residential sections of some 12,000 cities and towns in the United States, Canada, and Mexico. The maps were designed to assist fire insurance agents in determining the degree of hazard associated with a particular property and therefore show the size, shape, and construction of dwellings, commercial buildings, and factories as well as widths and names of streets, property boundaries, building use, and house and block numbers.

Sanborn Fire Insurance Maps from 1930, 1948, and 1958 were obtained from Environmental Risk Information Services. The Sanborn maps show the adjoining area to the northwest of the subject property, but do not cover the subject property or any other adjoining areas to the subject property. The Sanborn maps show the adjoining area to the northwest as dwellings. Copies of the [Sanborn maps](#) are in Appendix F.

4.7.5 CITY DIRECTORIES

A review of city directories from 1960, and from 1989 through 2024, in approximate five-year intervals, was obtained from Environmental Risk Information Services. The city directories show residential listings at the subject property in the 1989 through 2024 directories and no listings in the 1960 directory. None of the listings for the subject property are of obvious environmental concern.

The city directory listings for the adjoining properties consist of residential listings and a food store/convenience store/lounge to the north at 1103 Edwards Street. None of the listings for the adjoining properties are of obvious environmental concern.

4.7.6 LOCAL RECORDS

Velocity contacted local public agencies regarding information of environmental or historical significance for the subject property. The information requests and records received are included in Appendix H: [Local Records](#).

Source	Findings
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Source	Findings
Fire Department Records	The City of Fort Valley was contacted regarding fire department records of environmental significance for the subject property, such as records of chemical/petroleum storage tanks and reported spill incidents. The City of Fort Valley has yet to process or respond to Velocity's request. The ASTM 1527-21 Standard requires that any information received within 20 calendar days of a request at a nominal cost be reviewed and documented in the ESA report. Any information provided within this time frame or any information that will alter the conclusion and recommendations of this report will be provided to Freddie Mac.
Health Department Records	A request to the Georgia Environmental Protection Division under the Georgia Open Records Act (GORA) was made regarding records of environmental significance for the subject property, such as records of chemical/petroleum storage tanks and reported spill incidents. The GORA office has responded that there are no records on file for the subject property responsive to Velocity's request.
Building Department Records	A request for building department records for the subject property has been made with the City of Fort Valley. The City of Fort Valley has yet to process or respond to Velocity's request. The ASTM 1527-21 Standard requires that any information received within 20 calendar days of a request at a nominal cost be reviewed and documented in the ESA report. Any information provided within this time frame or any information that will alter the conclusion and recommendations of this report will be provided to Freddie Mac.
Tax Assessor Records	Velocity reviewed tax assessment records on-line at the Peach County Assessor website. The following information was obtained from the tax assessment records: • The property is identified as parcel F04B 004 • The property measures 10.96 acres • The site improvements were constructed in 1972
Zoning Records	The local zoning maps shows the subject property zoned as R-2

4.7.7 PROPERTY QUESTIONNAIRE

A Property Questionnaire was submitted to the site contact Michael Callegan of Exact Capital, requesting current and historical information on the subject property. A copy of the questionnaire is included in Appendix I. As of the issue date of this report, Velocity has not received a completed questionnaire. Any pertinent information received will be submitted as an addendum to this report.

4.7.8 INTERVIEWS

Velocity interviewed Mohammed Azizuddin, general contractor for the subject property. Mr. Azizuddin is not very familiar with the property since his company has only been on-site for less than two weeks. He had limited knowledge of the property. Relevant information from the interview has been included in the appropriate sections of this report.

4.7.9 PREVIOUS REPORTS

Velocity was not provided with any previous reports prepared for the subject property.

4.8 NEIGHBORHOOD HAZARDOUS WASTE ACTIVITY

A search of federal and state databases was conducted for the subject property and surrounding area within the approximate minimum search distance as specified by ASTM E 1527-21. The database searches were conducted by Environmental Risk Information Services (ERIS) on June 12, 2025 and are included in Appendix J: [ASTM Federal and State Database Searches](#). The results of the database searches are summarized in the table below.

Regulatory Database Sites Summary

Database	Search Radius	Subject Property Listed	Sites within Search Radius
FEDERAL ASTM REGULATORY DATABASE SUMMARY			
NPL	1.0 Mile	No	1
Delisted NPL	0.5 Mile	No	None
SEMS/CERCLIS	0.5 Mile	No	None
SEMS/CERCLIS Archive	0.5 Mile	No	None
RCRA CORRACTS	1.0 Mile	No	1
RCRA TSD	0.5 Mile	No	None
RCRA Generator	Property and adjoining	No	None
Instit/Eng Control	Property Only	No	NA
ERNS	Property Only	No	NA
STATE ASTM REGULATORY DATABASE SUMMARY			
State NPL/CERCLIS	1.0 Mile	No	2
State Landfill/ Waste Disposal	0.5 Mile	No	None
Voluntary Cleanup Program	0.5 Mile	No	None
Brownfields	0.5 Mile	No	1

Database	Search Radius	Subject Property Listed	Sites within Search Radius
Leaking Tanks	0.5 Mile	No	3
AST/UST	Property and adjoining	No	None
Instit/Eng Control	Property Only	No	NA
Spills	Property and adjoining	No	None

4.8.1 SUBJECT PROPERTY SUMMARY

The subject property is not listed on any of the Federal or State environmental regulatory databases reviewed for this assessment.

4.8.2 ADJOINING PROPERTY SUMMARY

No sites adjoining to the subject property are listed on any of the ASTM Federal or State environmental regulatory databases reviewed for this assessment.

4.8.3 NEARBY SITES OF CONCERN

Several nearby sites within the approximate minimum search distances from the subject property were identified on the environmental regulatory databases.

United States Environmental Protection Agency (USEPA) National Priority List (NPL) Database

There is one USEPA NPL Database site known as Woolfolk Chemical Works that is mapped as 0.41 miles to the north-northeast of the subject property. Information regarding this site was obtained from the USEPA website for Woolfolk Chemical Works (<https://cumulis.epa.gov/supercpad/cursites/csitinfo.cfm?id=0401315>) and from the most recent (September 2024) Fifth 5-year Review Report prepared by the USEPA. A copy of this report is in Appendix K.

This site is a 31-acre former pesticide manufacturer that began operations in 1910. The USEPA placed the site on the NPL in 1990 due to contaminated groundwater and soils resulting from facility operations. Cleanup actions have addressed contamination in the soil, sediments, and the attic dust of nearby residences; however, on-site and off-site groundwater contamination remains. Two separate vapor sampling events at nearby residences determined that, as of 2023, there was no immediate threat to the health of residents. Groundwater contamination is present in four separate aquifer zones with depths that range from approximately 30 to 400 feet below ground surface and extend more than three miles downgradient of the site. The full extent of groundwater contamination is unknown and is currently being investigated and delineated. In 2023-2024, the USEPA installed 36 wells to delineate the large groundwater plume extending from the site, identify potential additional sources of contamination, and to be

used during future cleanup efforts. Results from this sampling effort will help develop a better understanding of the extent of the groundwater contamination. Based on maps included in the September 2024 Fifth 5-year Review Report for the Woolfolk Chemical Works, the extent of the groundwater plumes appear to extend to below the northeastern portion of the subject property and continue to the southeast for over 1.25 miles. The remedy selected to address the groundwater contamination includes monitoring, containment, treatment, and institutional controls limiting the use of groundwater until performance goals are met. The September 2024 report states the remedy is on-going, and institutional controls have not yet been implemented and will be addressed in the next 5-Year Review report.

Since the groundwater contaminant plume from the Woolfolk Chemical Works NPL site extends beneath the northeastern subject property, it is a recognized environmental condition (REC). However, since the contamination is at depth (30-400 feet below ground surface) and the subject property utilizes publicly-supplied drinking water, this REC does not present a human health risk to the residents at the subject property. Furthermore, the historical research conducted for this assessment reveals no indication of previous uses that would implicate the subject property as a source of contamination and thus, Velocity is of the opinion that the subject property would not be held liable for cleanup activities for contamination that has migrated beneath the subject property from an off-site source.

Remaining Sites

The potential environmental impact of the remaining listings/sites identified on the regulatory databases to the subject property was evaluated by assessing the identified releases of hazardous materials at these sites, and the potential for such releases to migrate to and impact the subject property using the following factors: the ASTM Standard Guide for Vapor Encroachment E2600-15, regulatory status issued by applicable regulatory agencies, distance and hydrological location in relation to the subject property, the density of development in the area, potential contact with and exposure to contaminants, and source of potable water. Based on Velocity's evaluation, none of the nearby sites identified on the federal and state database searches have the potential to present an issue of environmental concern to the subject property.

There are six orphan sites (sites with insufficient information that are unmappable) listed on the database searches. By cross-referencing the street names of the sites with known street names surrounding the subject property, Velocity determined that none of the orphan sites appear to be located within the ASTM-specified approximate minimum search distance from the subject property.

4.9 MOLD

Background

Mold (also known as fungi) is present everywhere - indoors and outdoors, in homes, hospitals, and workplaces. There are over 100,000 species of mold. Of this amount at least 1,000 species are common in the United States. Most types of mold that are routinely encountered on non-agricultural properties are not hazardous to healthy individuals. However, large or lengthy exposures to mold have the potential to cause health problems.

Since mold is ubiquitous in our environment, elimination of all mold is practically impossible. Mold spores generally only have the potential to cause problems when present in large numbers. Therefore, the best way to prevent mold problems is to prevent mold growth.

Mold requires two things to survive - food and water (or moisture). Since food for mold can include a number of building materials (sheetrock, plaster, wood, ceiling tiles) as well as dirt and dust, elimination of food for mold is impractical. The best method to prevent mold growth is to identify and correct moisture and water problems before they create an environment that encourages mold growth. This can be accomplished by regular visual inspections of building systems, storage areas, and building exteriors by the building staff.

In some cases, moisture and mold growth may not be obvious. It is possible that moisture or mold growth may occur on hidden surfaces, such as within wall cavities, on the back side of drywall or wall coverings, on the tops of ceiling tiles, or the underside of carpets and floor coverings. Other possible locations of hidden moisture and mold growth include pipe chases and utility tunnels, porous thermal or acoustic liners inside ductwork, or roofing materials that lie between roof decks and ceilings.

Identification and correction of moisture and water problems includes the following:

- All plumbing should be routinely inspected. All leaks and defects should be repaired and all wet areas should be cleaned and thoroughly dried.
- Building foundations and exterior surfaces should be routinely inspected. Areas of moisture or water intrusion should be repaired and all wet areas should be cleaned and thoroughly dried.
- Building foundations should not be allowed to remain wet. Proper drainage should be provided and the ground should slope away from the building foundation.
- Roof drainage systems should be routinely inspected and kept in good working order, particularly following major precipitation events.
- Roofs should be inspected for obvious signs of leaking, split seams, and excessive ponding of water. Deficient areas should be promptly repaired and care should be taken to ensure that roof sublayers are kept thoroughly dry.
- Heating, ventilation and air conditioning (HVAC) systems should be regularly inspected and maintained. Drip pans should be kept clean, flowing properly, and unobstructed. HVAC air intakes should be kept free of excessive dirt and standing water.
- Cooling towers should be routinely inspected for mold growth and excessive dirt build-up that may lead to mold growth.

- All wet and damp areas and materials should be cleaned and dried as soon as possible, ideally within 48 hours of identification.
- Be aware of condensation and moist spots. Pipes with condensation should be insulated.
- Other areas prone to mold growth and moisture include: dryer vents, humidifiers, bathrooms, kitchens, steam utility rooms, saunas, whirlpools, swimming pool areas, fountains, attic spaces, windows, and sliding doors. Where possible, moisture-generating appliances should be vented to the outdoors.
- Maintain low indoor humidity. Levels should be below 60% relative humidity and, ideally between 30-50%.

Federal and state regulations specifically dealing with mold do not exist at this time. However, the following publicly-available publications should be considered:

- United States Environmental Protection Agency (USEPA) Publication 402-K-01-001 Mold Remediation in Schools and Commercial Buildings (<https://www.epa.gov/mold/mold-remediation-schools-and-commercial-buildings-guide-chapter-1>)
- USEPA Publication 402-K-02-003 A Brief Guide to Mold, Moisture, and Your Home (<https://www.epa.gov/mold/printable-version-brief-guide-mold-moisture-and-your-home>)
- American Society for Testing and Materials (ASTM) E 241-20 Standard Guide for Limiting Water Induced Damage to Buildings

The key to preventing and controlling mold growth is to properly maintain building materials and building systems. It is important to remember that mold growth occurs when moisture problems are not addressed promptly and thoroughly. In all situations, the underlying cause of water infiltration must be stopped and the impacted areas cleaned as soon as possible. Emphasis should be on ensuring proper repairs of the building so that water damage and moisture buildup does not occur.

Observations at Subject Property

Areas of mold growth were observed in the following apartments:

- Building A1, Unit 1, vacant - mold on bathroom ceiling and wall
- Building B2, Unit 1, occupied- mold above and on kitchen cabinets and walls, and on bathroom walls and ceiling
- Building C2, Unit 3, down - extensive mold throughout the unit
- Building C2, Unit 4, down - extensive mold throughout the unit
- Building C2, Unit 2, down - mold on bathroom and bedroom walls and ceilings
- Building C2, Unit 1, vacant- mold along base of walls
- Building C2, Unit 5, vacant- small amount of mold in closet ceiling
- Building C2, Unit 8, down - extensive mold throughout the unit
- Building C2, Unit 7, down - mold throughout the unit

- Building D2, Unit 3, occupied- mold on wall behind sink and under kitchen cabinet
- Building D2, Unit 7, occupied- mold on bathroom ceiling (appears to have been painted over)
- Building D1, Unit 1, down - mold throughout the unit
- Building F1, Unit 3, occupied- mold on closet wall

A fire occurred at the property in August 2024 that impacted the units at Building C2. Many of the unit interiors in C2 will need to be completely demolished; there is extensive mold and water damage throughout these units.

4.10 RADON

Background

Radon is an odorless, colorless radioactive gas that occurs from the natural breakdown of radium, uranium, and thorium. Radon gas causes cancer and can increase to harmful levels in enclosed unventilated spaces. Indoor radon gas levels depend primarily on underlying geologic formations and building construction characteristics.

The USEPA and the Centers for Disease Control and Prevention have used a continuous exposure of 4.0 picoCuries per liter (pCi/L) of air as the suggested remedial action level for radon exposure.

Observations at Subject Property

As per the agreed upon scope of work in the Letter Agreement, radon testing is not required.

4.11 SUPERLIEN STATUTE

The subject property is located in the State of Georgia. Georgia does not have “environmental superlien” laws that allow environmental authorities to place a first priority lien on the subject property as a result of environmental hazards.

4.12 HEATING SYSTEM

Heat and air conditioning for the property is provided by individual natural gas split systems that consist of furnaces located in the apartments and exterior rooftop pad-mounted condensers. Hot water is provided by central natural gas water heaters located in utility rooms. Velocity did not identify any recognized environmental conditions in connection with the heating and air conditioning systems.

4.13 OTHER ASTM CONSIDERATIONS

The Freddie Mac Multifamily Seller/Service Guide requires that the environmental report must comply with the ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527-21 Standard). Following are items that are required under the ASTM E 1527-21 Standard but are not provided for in the Freddie Mac Multifamily Seller/Service Guide or Freddie Mac Form 1103.

4.13.1 USER-PROVIDED INFORMATION

ASTM E1527-21 defines a *user* as " the party seeking to use Practice E1527 to complete an environmental site assessment of the subject property. A user may include, without limitation, a potential purchaser of subject property, a potential tenant of subject property, an owner of the subject property, a lender, or a property manager."

The "All Appropriate Inquiries" Final Rule (40 CFR Part 312) requires that these tasks be performed by or on behalf of a party seeking to qualify for a *Landowner Liability Protections* (LLPs) under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability. These tasks must also be completed by or on behalf of EPA Brownfield Assessment and Characterization grantees.

4.13.2 USER QUESTIONNAIRE

Velocity has forwarded a copy of the ASTM User Questionnaire to the user, Freddie Mac. One of the purposes of the ASTM User Questionnaire is to assist the user and the environmental professional in gathering information from the user that may be material to the identification of recognized environmental conditions. A copy of the User Questionnaire is in Appendix L: [User Questionnaire](#).

As of the issue date of this report, Velocity has not received a completed copy of the User Questionnaire.

4.13.3 ENVIRONMENTAL LIEN SEARCH AND ACTIVITY USE AND LIMITATIONS (AUL)

To meet the requirements of 40 CFR 312.20 and 312.25, a search for the existence of environmental liens and AULs that are filed or recorded against the subject property must be conducted. It is the responsibility of the user to provide this information, and the responsibility of the environmental professional to request this information from the user. The user's responsibility to search for environmental liens and AULs is in addition to the environmental professional's search of institutional control and engineering control registries.

Velocity has requested from Freddie Mac an environmental lien and AUL search for the subject property for inclusion in the Phase I ESA.

As of the issue date of this report, an environmental lien and AUL search for the subject property was not provided to Velocity.

4.13.4 SITE CONTACT AND KEY SITE MANAGER

ASTM E1527-21 defines a Key Site Manager as “the person identified by the *owner* or *operator* of a *subject property* as having good knowledge of the uses and physical characteristics of the *subject property*.” The site contact provided by the Client, the site escort, and the Key Site Manager are listed below.

	Name	Title/Contact Information
Site contact provided by Freddie Mac	Michael Callegan	Borrower
Site Escort	Mohammed Azizuddin	General contractor
Key Site Manager as per the ASTM E 1527-21 standard	Not available	Not applicable

4.13.5 REASON FOR PERFORMING PHASE I ESA

Freddie Mac provided no specific information regarding the reason for performing this Phase I ESA. However, Velocity assumes this Phase I ESA is to be used for a pending financial transaction.

4.13.6 OTHER USER PROVIDED DOCUMENTS

Freddie Mac provided no other documents as described in the ASTM E 1527-21.

5.0 CONCLUSIONS

Velocity has performed a Phase I Environmental Site Assessment in conformance with the the Letter Agreement and ASTM Practice E 1527-21 of the property known as Lakeview Apartments, located at 1105 Edward Street in Fort Valley, Georgia, the property. Any exceptions to, or deletions from, this practice are described in this report.

Velocity's assessment has revealed evidence of recognized environmental conditions and non-ASTM scope considerations in connection with the property. These recognized environmental conditions, and non-ASTM scope considerations are as follows:

Regulatory Database

A USEPA National Priority List (NPL) Database site known as Woolfolk Chemical Works is located as 0.41 miles to the north-northeast of the subject property. This site is a 31-acre former pesticide manufacturer that began operations in 1910. The USEPA placed the site on the NPL in 1990 due to contaminated groundwater and soils resulting from facility operations. Cleanup actions have addressed contamination in the soil, sediments, and the attic dust of nearby residences; however, on-site and off-site groundwater contamination remains. Two separate vapor sampling events at nearby residences determined that, as of 2023, there was no immediate threat to the health of residents. Based on the vapor sampling events and the distance of the site from the subject property, this site does not appear to present a vapor encroachment concern to the subject property. Groundwater contamination is present in four separate aquifer zones with depths that range from approximately 30 to 400 feet below ground surface and extend more than three miles downgradient of the site. The full extent of groundwater contamination is unknown and is currently being investigated and delineated. In 2023-2024, the USEPA installed 36 wells to delineate the large groundwater plume extending from the site, identify potential additional sources of contamination, and to be used during future cleanup efforts. Results from this sampling effort will help develop a better understanding of the extent of the groundwater contamination.

Based on maps included in the September 2024 Fifth 5-year Review Report for the Woolfolk Chemical Works, the extent of the groundwater plumes appear to extend to below the northeastern portion of the subject property and continue to the southeast for over 1.25 miles. A map showing the extent of the groundwater contaminant plume is at the front of Appendix K and a copy of the September 2024 Fifth 5-year Review Report is also in Appendix K. The remedy selected to address the groundwater contamination includes monitoring, containment, treatment, and institutional controls limiting the use of groundwater until performance goals are met. The September 2024 report states the remedy is on-going, and institutional controls have not yet been implemented and will be addressed in the next 5-Year Review report.

Since the groundwater contaminant plume from the Woolfolk Chemical Works NPL site extends beneath the northeastern portion of the subject property, it is a recognized environmental condition (REC). However, since the contamination is at depth (30-400 feet below ground surface), that the contamination does not appear to present a vapor encroachment concern to the subject property, and the subject property utilizes publicly-supplied drinking water, this REC does not present a human health risk to the residents at the subject property. Furthermore, the historical research conducted for this assessment reveals no indication of previous uses that would implicate the subject property as a source of contamination and thus, Velocity is of the opinion that the subject property would not be held liable for cleanup activities for contamination that has migrated beneath the subject property from an off-site source.

Lead-based Paint

Painted surfaces throughout the inspected portions of the subject property ranged from good to poor condition. The painted surfaces in the occupied units were in good to fair condition with localized areas of damage. The damage in the occupied units is generally limited to areas of water damage or areas where the drywall has contact damage; no areas of significantly peeling paint were observed in the occupied areas. The painted surfaces in the down and vacant units ranged from good to poor condition with many areas of damaged paint from water, mold, fire, and contact damage. Given the construction date of the site improvements (1972) it is possible that subsurface layers of paint contain lead. Based on Section 61.11 of the Freddie Mac Multifamily Seller/Service Guide, the paint on-site is assumed to be lead-based paint. The areas with damaged paint in the down and vacant units will be addressed as part of the renovation activities to put these units back onto the rental market.

Mold

Areas of mold growth were observed in 13 of the apartments inspected (see Section 4.9 for a list of the apartments with mold). The most extensive mold growth are in the vacant and down units, which also suffer from physical and/or fire damage. The source of the mold appear to include prior leaks, water damage, unoccupied/humid conditions, and poor housekeeping.

6.0 REFERENCES

FEDERAL SOURCES
ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E 1527-21 Standard)
Chapter 61 of Freddie Mac Multifamily Seller/Service Guide
The United States Geological Survey (USGS) 7.5-Minute Topographic Quadrangle Map
The USGS Groundwater Watch website https://groundwaterwatch.usgs.gov/compositemap.html
The United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) Soil Survey https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx
USEPA Map of Radon Zones (http://www.epa.gov/iaq/radon/zonemap.html)
STATE AND LOCAL SOURCES
Information request to City of Fort Valley for fire and building department records
Information request to Georgia Environmental Protection Division under the Georgia Open Records Act (GORA)
Tax assessment records from Peach County Assessor website
2024 Fort Valley Utility Commission Annual Water Quality Report, https://www.fvutil.com/news_242_2937832147.pdf
NETR Environmental Lien and AUL State Statutes, http://environmental.netronline.com/lienStatutes.aspx

7.0 KEY DEFINITIONS

Unless stated otherwise, all definitions are as per the ASTM E1527-21 Standard.

Activity and Use Limitations (AULs), *n*—legal or physical restrictions or limitations on the use of, or access to, a site or facility: (1) to reduce or eliminate potential exposure to *hazardous substances* or *petroleum products* in the soil, soil vapor, groundwater, and/or surface water on the *property*, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. These legal or physical restrictions, which may include *institutional* and/or *engineering controls*, are intended to prevent adverse impacts to individuals or populations that may be exposed to *hazardous substances* and *petroleum products* in the soil, soil vapor, groundwater, and/or surface water on a *property*.

Adjoining Properties, *n*—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.

All Appropriate Inquiries (AAI), *n*—that inquiry constituting *all appropriate inquiries* into the previous ownership and uses of the *subject property* consistent with good commercial and customary practice as defined in CERCLA, 42 U.S.C. § 9601(35)(B) and 40 C.F.R. Part 312, that will qualify a party to a *commercial real estate transaction* for one of the threshold criteria for satisfying the *LLPs* to CERCLA liability (42 U.S.C. §§ 9601(35)(A) & (B), § 9607(b)(3), § 9607(q), and § 9607(r)), assuming compliance with other elements of the defense.

Asbestos, *n*—as per the USEPA, any material that contains greater than 1% asbestos

Business Environmental Risk (BER), *n*—a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of *commercial real estate*, not necessarily related to those environmental issues required to be investigated in this practice.

Controlled Recognized Environmental Condition, *n*—*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 implementation of required controls (for example, *activity and use limitations* or *other property use limitations*).

Data Failure, *n*—failure to achieve the historical research objective in 8.3.1 even after reviewing the *standard historical resources* in 8.3.4.1 through 8.3.4.8 that are *reasonably ascertainable* and likely to be useful. *Data failure* is one type of *data gap*.

Data Gap, *n*—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.).

de minimis condition, *n*—a condition related to a *release* 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.

A condition determined to be a *de minimis condition* is not a *recognized environmental condition* nor a *controlled recognized environmental condition*.

Engineering Controls, *n*—physical modifications to a site or facility (for example, capping, slurry walls, or point of use water treatment) to reduce or eliminate the potential for exposure to *hazardous substances* or *petroleum products* in the soil or groundwater on a *property*. *Engineering controls* are a type of *activity and use limitation (AUL)*.

Environmental Compliance Audit, *n*—the investigative process to determine if the operations of an existing facility are in compliance with applicable environmental laws and regulations. This term should not be used to describe the ASTM E 1527-21 standard, although an *environmental compliance audit* may include an *environmental site assessment* or, if prior audits are available, may be part of an *environmental site assessment*.

Environmental Lien, *n*—a charge, security, or encumbrance upon title to a *property* to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of *hazardous substances* or *petroleum products* upon a *property*, including (but not limited to) liens imposed pursuant to CERCLA 42 U.S.C. §§ 9607(1) & 9607(r) and similar state or local laws.

Environmental Professional, *n*—a person meeting the education, training, and experience requirements as set forth in 40 C.F.R. § 312.10(b). The person may be an independent contractor or an employee of the *user*.

Environmental Site Assessment (ESA), *n*—the process by which a person or entity seeks to determine if a *subject property* is subject to *recognized environmental conditions*.

At the option of the *user*, an *environmental site assessment* may include more inquiry than that constituting *all appropriate inquiries* or, if the *user* is not concerned about qualifying for the *LLPs*, less inquiry than that constituting *all appropriate inquiries*. An *environmental site assessment* is both different from and often less rigorous than an *environmental compliance audit*.

Good Faith, *n*—absence of any intention to seek an unfair advantage or to defraud another party; an honest and sincere intention to fulfill one's obligations in the conduct or transaction concerned.

Historical Recognized Environmental Condition, *n*—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*). A *historical recognized environmental condition* is not a *recognized environmental condition*.

Innocent Landowner Defense [42 U.S.C. §§ 9601(35) & 9607(b)(3)], *n*—a person may qualify as one of three types of innocent landowners: (1) a person who “did not know and had no reason to know” that contamination existed on the *subject property* at the time the purchaser acquired the *subject property*; (2) a government entity which acquired the *subject property* by escheat, or through any other involuntary transfer or acquisition, or through the exercise of eminent domain authority by purchase or condemnation; or (3) a person who “acquired the facility by inheritance or bequest.” To qualify for the *innocent landowner* defense, such person must have made *all appropriate inquiries* on or before the date of purchase. Furthermore, the *all appropriate inquiries* must not have resulted in knowledge of the contamination. If it does, then such person did “know” or “had reason to know” of contamination and would not be eligible for the *innocent landowner defense*.

Institutional Controls (IC), *n*—a legal or administrative mechanism (for example, “deed restrictions,” restrictive covenants, easements, or zoning) on the use of, or access to, a site or facility to (1) reduce or eliminate potential exposure to *hazardous substances or petroleum products* in the soil or groundwater on the *property*, or (2) to prevent activities that could interfere with the effectiveness of a response action, in order to ensure maintenance of a condition of no significant risk to public health or the environment. An *institutional control* is a type of *activity and use limitation (AUL)*.

Key Site Manager, *n*—the person identified by the *owner* or *operator* of a *subject property* as having good knowledge of the uses and physical characteristics of the *subject property*.

Landowner Liability Protections (LLPs), *n*—a defense to CERCLA available to *bona fide prospective purchasers*, *contiguous property owners*, and *innocent landowners*.

Lead-based Paint, *n*—the USEPA defines “lead-based paint” as any paint, surface coating that contains lead equal to or exceeding one milligram per square centimeter or 0.5% by weight.

Major Occupants, *n*—those tenants, subtenants, or other persons or entities each of which uses at least 40 % of the leasable area of the *subject property* or any anchor tenant when the *subject property* is a shopping center.

Material Threat, *n*—*obvious* threat which is likely to lead to a *release* and that, in the opinion of the *environmental professional*, would likely result in impact to public health or the environment. An example might include an aboveground storage tank system that contains a *hazardous substance* and which shows evidence of damage. The damage would represent a *material threat* if it is deemed serious enough that it may cause or contribute to tank integrity failure with a *release* of contents to the *environment*.

Obvious, *adj*—that which is plain or evident; a condition or fact that could not be ignored or overlooked by a reasonable observer.

Pits, ponds, or lagoons, *n*—*manmade* or natural depressions in a ground surface that are likely to hold liquids or sludge containing *hazardous substances* or *petroleum products*. The likelihood of such liquids or sludge being present is determined by evidence of factors associated with the pit, pond, or lagoon, including, but not limited to, discolored water, distressed vegetation, or the presence of an *obvious wastewater* discharge.

Practically Reviewable, *adj*—information that is *practically reviewable* means that the information is provided by the source in a manner and in a form that, upon examination, yields information relevant to the *subject property* without the need for extraordinary analysis of irrelevant data. The form of the information shall be such that the *user* can review the records for a limited geographic area. Records that cannot be feasibly retrieved by reference to the location of the *subject property* or a geographic area in which the *subject property* is located are not generally *practically reviewable*. Most databases of public records are *practically reviewable* if they can be obtained from the source agency by the county, city, zip code, or other geographic area of the facilities listed in the record system. Records that are sorted, filed, organized, or maintained by the source agency only chronologically are not generally *practically reviewable*. Listings in *publicly available* records which do not have adequate address information to be located geographically are not generally considered *practically reviewable*. For large databases with numerous records (such as RCRA hazardous waste generators and registered *underground storage tanks*), the records are not *practically reviewable* unless they can be obtained from the source agency in the smaller geographic area of zip codes. Even when information is provided by zip code for some large databases, it is common for an unmanageable number of sites to be identified within a given zip code. In these cases, it is not necessary to review the impact of all the sites that are likely to be listed in any given zip code because that information would not be *practically reviewable*. In other words, when so much information is generated that it cannot be feasibly reviewed regarding its impact on the *subject property*, it is not *practically reviewable*.

Property use limitation, *n*—limitation or restriction on current or future use of a *property* in connection with a response to a *release*, in accordance with the applicable regulatory authority or authorities that allows *hazardous substances* or *petroleum products* to remain in place at concentrations exceeding unrestricted use criteria.

Publicly Available, *adj*—information that is *publicly available* means that the source of the information allows access to the information by anyone upon request.

Radon *n*—An odorless, colorless radioactive gas that causes lung cancer. Radon occurs from the natural breakdown of radium, uranium, and thorium. Radon gas causes cancer and can increase to harmful levels in enclosed unventilated spaces. Indoor radon gas levels depend primarily on underlying geologic formations and building construction characteristics.

Reasonably Ascertainable, *adj*—information that is (1) *publicly available*, (2) obtainable from its source within reasonable time and cost constraints, and (3) *practically reviewable*.

Recognized Environmental Condition, n —(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*.

Significant data gap, n—a *data gap* that affects the ability of the *environmental professional* to identify a *recognized environmental condition*.

Underground Storage Tank (UST), n—any tank, including underground piping connected to the tank, that is or has been used to contain *hazardous substances* or *petroleum products* and the volume of which is 10 % or more beneath the surface of the ground.

User, n—the party seeking to use Practice E1527 to complete an *environmental site assessment* of the *subject property*. A *user* may include, without limitation, a potential purchaser of *subject property*, a potential tenant of *subject property*, an *owner* of the *subject property*, a lender, or a *property manager*.

Visually and/or Physically Observed, v—during a *site visit* pursuant to this practice, this term means observations made by visual, auditory, or olfactory means while performing the *site reconnaissance*.

APPENDIX A

PICTURES



Picture #1: Apartment buildings



Picture #2: Paved walkway and apartment buildings



Picture #3: Apartment buildings



Picture #4: Apartment buildings



Picture #5: Parking areas and apartment building



Picture #6: Boarded up Bldg C2 due to fire damage



Picture #7: The management office building



Picture #8: Storage trailers



Picture #9: Surrounding area to the northwest



Picture #10: Surrounding area to the northeast



Picture #11: Surrounding area to the east



Picture #12: Surrounding area to the south



Picture #13: Natural gas-fired furnace in an apartment



Picture #14: Condenser units on a roof



Picture #15: Natural gas-fired water heater in an apartment



Picture #16: Non-friable vinyl floor tiles in an apartment



Picture #17: Damaged SAC vinyl floor tiles in an occupied unit



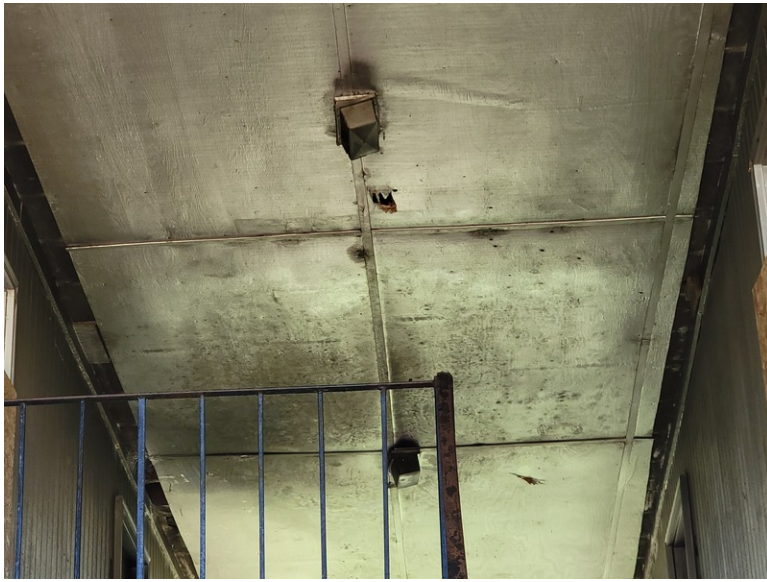
Picture #18: Non-friable SAC roofing materials



Picture #19: Damaged painted surfaces in a down unit



Picture #20: Utility-owned transformer



Picture #21: Mold on a breezeway soffit



Picture #22: Mold growth in a down unit



Picture #23: Mold growth in a down unit



Picture #24: Mold growth in a down unit



Picture #25: Mold growth in a down unit



Picture #26: Mold growth in a vacant unit



Picture #27: Mold growth in an occupied unit



Picture #28: Mold growth in an occupied unit



Picture #29: Mold growth in a down unit



Picture #30: Management office finishes



Picture #31: Apartment unit finishes



Picture #32: Apartment unit finishes



Picture #33: Apartment unit finishes



Picture #34: Apartment unit finishes



Picture #35: Apartment unit finishes



Picture #36: Apartment unit finishes



Picture #37: Apartment unit finishes



Picture #38: Apartment unit finishes



Picture #39: Apartment unit finishes



Picture #40: Apartment unit finishes



Picture #41: Apartment unit finishes

APPENDIX B
ASBESTOS SAMPLE ANALYSIS

No friable suspect asbestos-containing materials were identified on the subject property.
Therefore, no asbestos samples were collected.

APPENDIX C
LEAD-BASED PAINT SAMPLE ANALYSIS

The painted areas on-site are assumed to contain lead.
A lead-based paint Operation and Maintenance Program has been recommended

APPENDIX D
RADON TEST RESULTS

As per the agreed upon scope of work in the Letter Agreement, radon testing is not required.

APPENDIX E
AERIAL PHOTOGRAPHS