

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Former Pillsbury Plant
1525 East Phillips Street
Springfield, Illinois 62702

Project No.: 21-230

May 3, 2021



2060 West Iles Avenue
Suite A
Springfield, Illinois 62704

Prepared for:

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1.0 SUMMARY

At the request and authorization of Moving Pillsbury Forward, NFP; Fehr-Graham & Associates, LLC (Fehr Graham) has completed a Phase I Environmental Site Assessment (ESA) on the former Pillsbury Plant located at 1525 East Phillips Street in Springfield, Illinois 62702. This assessment has been performed in general accordance with ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process".

Based on the information provided from results of record searches, site investigation, environmental database search, survey of physical features, historical data, and interviews; this assessment has revealed the following Recognized Environmental Conditions (RECs) in connection with the Property:

- The storage and handling of hazardous materials and petroleum products for large scale manufacturing operations with a history of violations and over 40 years of operation prior to robust environmental regulation presents the potential for historical releases to the environment through undocumented spills and leaks and/or improper disposal of wastes.
- Based on the findings of prior assessments which were completed during the time of facility operations and included detailed site reconnaissance, there was historical discharge of oils and/or other hazardous materials or petroleum products to drains within the facility. Given the age of the facility and unknown integrity of piping, it is possible that discharges of hazardous materials and/or petroleum products to the sanitary network resulted in releases to the environment.
- Four (4) underground storage tanks (USTs) were abandoned in place in 1990; however, UST investigation sampling did not include all potential contaminants of concern applicable for the historical tank contents, and the piping may not have been properly removed or abandoned. Therefore, historical operation of the USTs may have resulted in previously unidentified releases of petroleum products to the environment through tank or piping leaks or tank overfills.
- There is a potential for past releases of hazardous materials and/or petroleum products to have occurred from the long-term use of railroad spurs on the Property through leaching of chemicals from railroad spurs and ties, treatment of track areas with pesticides/herbicides, engine emissions, and/or leaks and spills during loading/unloading or idling of damaged locomotives.

Adjoining and Surrounding Sites

- There is a potential for past releases of hazardous materials and/or petroleum products from railyard operations on the northeast adjoining site to have migrated onto the Property and negatively impacted underlying soil, soil gas, and/or groundwater.

In addition, the following significant data gaps were encountered that have the potential to lead to the identification of additional RECs:

- The site reconnaissance could not be completed due to a last minute legal challenge to IEPA over site access that requires a court hearing to resolve. There is potential for storage tanks, drums, waste dumping, or other evidence of releases of hazardous materials and/or petroleum products to the environment which cannot be adequately assessed without Property access for reconnaissance.
- Two (2) buried fuel oil tanks are depicted on the 1950, 1952, and 1972 historical Sanborn Maps near the corner of East Phillips Street and North 16th Street. It is likely that these tanks are the same as the three (3) abandoned fuel oil tanks reportedly located at the south end of Warehouse 3. However, since the tanks are depicted in a slightly different location and the number of tanks is inconsistent, it is possible that the Sanborn Maps depict additional USTs on the Property which have no record of removal or abandonment.

The following Business Environmental Risks (BERs) that exist beyond CERCLA liability may be associated with the Property:

- Asbestos containing building materials have been documented on the Property. Significant asbestos removal efforts were completed by US EPA; however, asbestos containing materials are anticipated to remain in portions of the facility and may exist in shallow soils as a result of documented improper building demolition activities.
- Based on the construction date of the Property buildings and silos, there is a potential for painted surfaces to contain lead above regulatory levels.

2.0 INTRODUCTION

2.1 Purpose

Fehr Graham has completed a Phase I ESA on the former Pillsbury plant located at 1525 East Phillips Street in Springfield, Illinois 62702. This site is hereafter referred to as the Property. This assessment was performed at the request and authorization of Moving Pillsbury Forward, NFP. The purpose of this Phase I ESA is to identify, to the extent feasible, RECs in connection with the Property or surrounding properties that may be potential sources of environmental risk or liability.

This assessment has been performed in general accordance with ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process". The current edition of ASTM E1527 was approved on November 1, 2013. On December 30, 2013, the Environmental Protection Agency (EPA) published a final rule in the Federal Register (78 FR 79319) recognizing the ASTM E1527-13 Phase I ESA standard practice as an approved method for complying with the All Appropriate Inquiry (AAI) rule.

As such, this assessment is also intended to satisfy the AAI requirements of 40 CFR Part 312 - Innocent Landowners, Standards for Conducting AAI (AAI Final Rule); the Small Business Liability Relief and Brownfields Revitalization Act of 2002 (Public Law 107-118 (H.R. 2869); and CERCLA [42 USC Chapter 103, 9601(35)].

2.2 Definitions

The ASTM E1527-13 Standard defines a REC as: "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 RECs".

A Controlled Recognized Environmental Condition (CREC) is defined in ASTM E1527-13 as "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..., with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, Property use restrictions, Activity and Use Limitations (AULs), institutional controls, or engineering controls)". A CREC is considered a REC.

A Historical Recognized Environmental Condition (HREC) is defined in ASTM E1527-13 as “a past release of any hazardous substances or petroleum products that has occurred in connection with the Property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the Property to any required controls”. An HREC is not considered a REC.

A *de minimis* condition is defined in ASTM E1527-13 as “a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies”.

A *data gap* as defined in ASTM E1527-13 may be a result of a data failure with the historical review or other limitations encountered that prevented the Environmental Professional from evaluating the current and historical uses of the Property, or in some cases the surrounding sites.

2.3 Detailed Scope of Services

The scope of services for the preparation of this Phase I ESA included the collection and evaluation of reasonably available information by:

- 1) Conducting site reconnaissance to obtain information indicating the likelihood of RECs in connection with the Property.
- 2) Conducting an evaluation of properties in the vicinity of the Property to identify the likelihood of RECs in connection with the adjoining sites that could be considered a REC to the Property.
- 3) Reviewing *Government Records* available through database record searches to identify RECs in connection with the Property and general vicinity.
- 4) Requesting any permits, enforcement documents, or other items contained within regulatory agency files, which pertain to the Property and adjoining sites, as applicable.
- 5) Reviewing available and reasonably ascertainable historical use sources to develop a history of the previous uses of the Property in order to identify the likelihood of past uses having led to RECs in connection with the Property.
- 6) Conducting a survey of physical setting sources to assess the impact of potential migration (site geology and hydrology) as related to RECs at the Property.
- 7) Conducting interviews with reasonably ascertainable current/past owners, site managers, and occupants along with individuals associated with surrounding sites to obtain information pertaining to RECs in connection with the Property.

Additional contractual conditions outside the standard scope of services required by the Environmental Professional and agreed upon by the User of this Phase I ESA are as follows:

- Fehr Graham contracted Chicago Title to review reasonably ascertainable recorded land title records for environmental liens or AULs currently recorded against or relating to the Property.

In accordance with the ASTM guidelines for Phase I ESAs, analytical sampling of air, soils, and groundwater was not conducted. In addition, the following non-scope items were specifically not addressed during the site investigation, nor included within this assessment: asbestos, other building materials; biological agents; radon gas; radioactivity; lead paint, lead in drinking water; electromagnetic fields; regulatory compliance; cultural and historical resources; industrial hygiene; indoor air quality unrelated to releases of hazardous substances or petroleum products into the environment; mold; PCBs in caulk; per- and polyfluoroalkyl substances (PFAS); health and safety; ecological resources; endangered species; and wetlands. Furthermore, no evaluation was completed pertaining to environmental issues related to the use and production of controlled substances on the Property.

Evaluation of these non-scope items is neither required nor relevant for compliance with the AAI Final Rule or ASTM E1527-13. Users may desire to expand the scope of due diligence to assess other Business Environmental Risks (BERs) that exist beyond CERCLA liability associated with the Property. Users should be aware that there may be other additional requirements by federal, state, and local laws at the Property that are beyond the scope of this ASTM E1527-13 practice.

2.4 Significant Assumptions

This assessment is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with the Property, within reasonable limits of time and cost. In some instances, it is necessary to make certain assumptions regarding a piece of Property in order to draw conclusions about conditions found on the Property. It is important to be aware of any significant assumptions made in relation to the Property when reviewing the Environmental Professional's assessment of the Property. All significant assumptions made during the completion of this Phase I ESA are identified below.

In general, groundwater flow direction has been determined based on topography in the vicinity of the Property; *(i.e. the assumption that shallow groundwater flow will typically follow surface topography, or on other available resources)*. No site-specific field measurements of groundwater flow direction *(e.g. installation and evaluation of groundwater monitoring wells)* have been performed as part of this assessment. Fehr Graham has obtained and reviewed site information for sites located nearby, with particular interest paid to sites located in a presumed up-gradient direction of groundwater flow that, further based on proximity and knowledge of potential contaminant fate and transport, may present a potential to impact the Property.

For investigation and cleanup of off-site releases with the oversight of the Illinois Environmental Protection Agency (IEPA) or the U.S. Environmental Protection Agency (USEPA) in which the department or agency has granted closure of the case, it is assumed that the conditions of this closure are protective of human health and the environment and that the site no longer represents an environmental risk to neighboring properties unless records specifically identify such risks, includes restrictive use controls, or identifies deficiencies in the historical work associated with the site.

For the purposes of ASTM E1527-13, "migration or migrate" refers to the movement of hazardous substances or petroleum products in any form, including for example, solid and liquid at the surface or subsurface, and vapor in the subsurface.

2.5 Limitations, Exceptions, and Deviations

Inevitably, there are cases where a Property possesses limitations, exceptions, and deviations that do not allow the Environmental Professional to accurately or confidently assess past or present environmental impacts to the site. In addition, there are times when certain exceptions must be made to continue with the assessment process. Deviations may result from User-imposed constraints or physical limitations. These limitations, exceptions, and deviations can directly affect a site assessment.

Information provided in all Phase I ESA reports is based on research of available documents, records, and maps held by appropriate government or private agencies. These are subject to the limitations of historical documentation, and the availability and accuracy of pertinent records. The validity of information gained during personal interviews is subject to the accuracy of the personal recollections of interviewees. Specific limitations, exceptions, and deviations encountered during this Phase I ESA are as follows:

- Access to the Property for the site reconnaissance was not provided. The Property was inspected from right-of-way areas only. Further discussion is provided in Section 9.1.

2.6 Special Terms and Conditions

Consideration must be given to any special terms and conditions unique to a particular Phase I ESA. Freedom of Information Act (FOIA) requests have been submitted to government entities requesting documentation relating to the environmental history of the Property and surrounding sites. Responses to such requests are often backlogged; therefore, any pertinent information that becomes available upon completion of this report will be forwarded as an amendment to this document. Any data gaps generated as a result of the deficiencies are listed and explained in Section 9.0 (Findings/Opinions). Additionally, the findings of this report are based upon record and document reviews, site observations, interviews, and other sources of information presented in this report. No collection of samples, testing or intrusive investigation was conducted.

2.7 User Reliance and Obligations

Fehr Graham does not warrant or guarantee the environmental conditions of the site or warrant the User's ability to assert any of the defenses under the Small Business Liability Relief and Brownfields Revitalization Act or any comparable state and/or local laws. Documents and data provided by the User, designated representatives of the User, owner, operator, or other interested parties, and consulted in the preparation of this assessment, have been reviewed and may be referenced herein, with the understanding that Fehr Graham assumes no responsibility or liability for their accuracy.

As presented within ASTM E1527-13 Standard (Section 6.0, User's Responsibilities), certain tasks are required to be performed by the User of the Phase I ESA to help identify possible RECs in connection with a Property, unless otherwise included as an additional scope of work agreed upon by the User within the signed Agreement for Professional Engineering Services. A description of the User required tasks is presented in Section 4.0 of this Phase I ESA. In addition, Section 4.0 of this report presents any information provided by the User. Any insufficiencies related to the User-required tasks are presented in Section 2.5, Limitations, Exceptions, and Deviations of this Phase I ESA.

This assessment has been prepared for the exclusive use of Moving Pillsbury Forward, NFP. No other party shall have any right to rely on any service provided by Fehr Graham without prior written consent. Additionally, there are time limitations to this report that affect the User's reliance. As found within 40 CFR 312.20, "All Appropriate Inquiry pursuant to CERCLA section 101(35)(B) must be conducted within one year prior to the date of acquisition of the subject property". Furthermore, the following components of the All Appropriate Inquiry (AAI) must be conducted or updated within 180 days of and prior to the date of acquisition of the Property:

- 1) Interviews with past and present owners, operators, occupants.
- 2) Searches for recorded environmental cleanup liens.
- 3) Reviews of federal, tribal, state, and local government records.
- 4) Visual inspections of the facility and of adjoining properties.
- 5) The declaration by the Environmental Professional.

Table 1 presents the dates of completion of the above-specified components for this assessment. Should the date of the Property acquisition be beyond the specified time periods in Table 1, the Phase I ESA and/or the required components would require an update in order to rely on this assessment.

Table 1 - Component Completion Dates

Component	Date(s) Completed	Validity
Completion Date of Phase I ESA	May 3, 2021	1 Year
Interviews with past and present owners, operators, occupants	Not Available	180 Days
Searches for recorded environmental cleanup liens	April 8, 2021	180 Days
Reviews of federal, tribal, state, and local government records	March 23, 2021	180 Days
Visual inspections of the Property and of adjoining properties	April 1, 2021	180 Days
The declaration by the Environmental Professional	May 3, 2021	180 Days

3.0 SITE DESCRIPTION

3.1 Location and Legal Description

The Property consists of 16 parcels of land encompassing approximately 20 acres, including one (1) 18.6-acre parcel (main parcel) and several smaller parcels located to the southeast and west of the main parcel. The Property is located at the northeast corner of the intersection of East Phillips Street and North 15th Street and is identified by common address 1525 East Phillips Street, Springfield, Illinois 62702. However, select parcels to the southeast and west of the main parcel are identified in the Sangamon County Parcel Viewer with other common addresses, including 1600 Phillips Avenue, 910 North 16th Street, 1000 North 16th Street, or no address listed. The following parcel index numbers (PINS) are associated with the Property:

<u>Main Parcel:</u>	<u>Southeast Parcels:</u>	<u>Southeast Parcels (cont.):</u>
<ul style="list-style-type: none">• 14260101001	<ul style="list-style-type: none">• 14260152001• 14260152002• 14260152003• 14260152004• 14260152005• 14260152006	<ul style="list-style-type: none">• 14260152007• 14260152008• 14260152009• 142601520010• 142601520011• 142601520012
<u>West Parcels:</u>		
<ul style="list-style-type: none">• 14270235001• 14270278002• 14270282001		

A Site Vicinity Map and Site Plan are presented in Appendix 1. Legal descriptions are provided in the Commitment for Title Insurance in Appendix 5.

3.2 Site and Vicinity General Characteristics

The Property is located in a mixed industrial and residential setting in the City of Springfield, Sangamon County, Illinois. The Property is surrounded to the north and east by a large railyard, and to the south and west by residential properties. North 15th Street is located to the west of the Property and East Phillips Street is located to the south of the Property.

3.3 Current Use of the Property

The Property is currently occupied by a vacant and dilapidated flour mill industrial facility.

3.4 Description of Site Structures, Roads, and Improvements

The Property is developed with a vacant industrial complex consisting of a conglomerate of interconnecting structures formerly used for grain milling, manufacturing, warehousing, and office (Property buildings), as well as silos for grain storage. Several buildings have been demolished since the time of facility operations. A layout map depicting the existing and former structures and their historical use is provided as the Site Layout in Appendix A. The facility was constructed in stages between 1929 and the mid-1950s and were constructed primarily of brick and masonry. The remaining grounds consist of areas of gravel, concrete, and grass, with several rail spurs. The facility is currently surrounded by security fencing. Portions of the Property outside the fence consist of a roadway (15th Street) and paved parking areas to the west of the facility, and a grassy area to the southwest of the facility. More detailed description of the Property, including interior observations, is not available since site access was not granted.

3.4.1 Potable Water Source

Potable water is supplied to the Property and surrounding sites by City Water, Light & Power of the City of Springfield (CWLP). CWLP obtains water from Lake Springfield. No private or community water supply wells were identified on the Property in the IEPA Source Water Protection Area (SWAP) database. According to the IEPA Sites with NFRs mapping application, the Property is located within a groundwater use ordinance area (Ordinance No. 226-04-06, established February 2, 2007), which prohibits installation of new potable water wells. A copy of the groundwater use ordinance is included in Appendix 4.

3.4.2 Wastewater and Stormwater

Wastewater and stormwater within the City of Springfield are discharged into separate sanitary and storm sewer systems. Sanitary wastewater is collected via underground piping that ultimately terminates and is treated at the Sangamon County Water Reclamation District. There is currently no sanitary or process wastewater generated on the Property; however, historical wastewater discharges are discussed further in Section 4.9. Stormwater run-off from the Property appears to flow into stormwater catch basins located on the Property and in the adjacent rights-of-way. No evidence of existing or former septic systems was identified in Property records.

3.4.3 Other Known Utilities

No other known utilities are active on the Property.

3.5 Current Uses of Adjoining Sites

Table 2 - Adjoining Site Summary

Direction	Owner/Occupant	Address	Apparent Property Use
Northeast	Illinois & Midland Railroad Inc.	1500 E. North Grand Avenue	Railyard
South	Government Property Fund LLC; Fulcrum Property Corp	1401 Concordia Ct	Parking
	Private/residential occupants	1500-1524 (even addresses) E. Phillips Street	Residences
	Therumarc LLC	1536 E. Phillips Street	Vacant
	Private/residential occupants	1601-1705 (odd addresses) Matheny Avenue	Residences
	Private/residential occupant	904 N. 17 th Street	Residence
	Illinois & Midland Railroad Co.	No address. PINs: 14265502010 & 14265502009	Vacant
West	Private/residential occupants	901-1321 (odd addresses) N. 15 th Street	Residences

3.6 Physical Setting Sources

The topography of the Property and surrounding area was observed during the on-site reconnaissance. The topography of the area is relatively flat within a 1/8-mile radius of the Property.

Topographic Map Review

Regional topography was determined by review of the Springfield West and Springfield East Quadrangle Maps, dated 1976. According to the topographical map reviewed and the database radius report, the Property is approximately 604 feet above mean sea level (MSL). Several structures and rail spurs are depicted on the Property, and the northeast adjoining site is depicted as a railyard. Surrounding sites are shaded pink to indicate dense urban development. No pits or bodies of water were identified on the Property or adjoining sites on the topographical map reviewed. Review of additional historical topographic maps is discussed in Section 6.10. The general topography of the area displays an approximate five (5)-foot increase in elevation within 0.5 miles west of the Property. A copy of the reviewed topographical map is presented as the Site Vicinity Map in Appendix 1.

Soil Survey

According to the United States Department of Agriculture (USDA) *Web Soil Survey*, the soils in the vicinity of the Property are mapped as Sable silty clay loam. Typically, these soils are composed of silty clay loam and silty loam derived in swales. These soils are generally poorly drained with slopes between 0 and 2 percent.

Regional Geology

To determine the local geological setting, the ISGS-published circular titled "Potential for Contamination of Shallow Aquifers in Illinois", aka "The Berg Circular" (Berg, Kempton, and Cartwright, 1984) was reviewed. The map identifies the general ability of the upper horizons of soil to contain and attenuate contaminants resulting from activities occurring above or within those soil horizons. Soils with the least potential for containment and attenuation allow water, and thereby contaminants, to move through them rapidly. As the potential for containment and attenuation increases, the potential for aquifer contamination decreases. The Berg Circular indicates the geology in the vicinity of the Property as having the following characteristics. The Property is located within the rating area of D3. In general, a D3 rating area contains relatively impermeable shale or limestone within 20 feet of the surface, overlain by till or other fine-grained materials. In addition, this rating area has a very low for aquifer contamination.

Based on information on file with the IEPA for an adjoining site investigation (Illinois & Midland Railroad, LPC# 1671205168), shallow soils at the Property are anticipated to consist predominantly of clays and silts with intermingled sands and gravels; and groundwater is anticipated to be approximately 4 to 6 feet below ground surface and flowing to the southeast.

4.0 USER-PROVIDED INFORMATION

A User Questionnaire was provided to Mr. J. Chris Richmond, the President of Moving Pillsbury Forward, NFP. As presented within ASTM E1527-13 Standard (Section 6.0, User's Responsibilities), certain tasks are required to be performed by the User of the Phase I ESA to assist the Environmental Professional (EP) in identifying potential RECs in connection with a Property. A copy of the completed User Questionnaire, as well as any additional information provided by the User, is included in Appendix 2.

4.1 Title Records

Reasonably ascertainable recorded land title records can be checked by the User to evidence records of fee ownership, leases, land contracts, easements, liens, and other encumbrances on the Property. The User of this Phase I ESA has authorized Fehr Graham to contract Chicago Title to review recorded land title records for environmental liens or AULs recorded against or relating to the Property. Information obtained from the title records review is included in Section 6.9.

4.2 Environmental Liens or AULs

An environmental lien is a charge, security, or encumbrance upon the 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. An activity and use limitation is a legal or physical restriction or limitation on the use of, or access to, a site or facility to either reduce or eliminate potential exposure to hazardous substances in the soil or groundwater on the Property, or to prevent activities that could interfere with the effectiveness of a response action, and to ensure maintenance of a condition of no significant risk to public health or the environment. ASTM E1527-13 section 6.2 specifies that the user of this Phase I ESA should check recorded land title records and judicial records for evidence of any environmental liens. According to the User Questionnaire, Mr. Richmond was aware of environmental cleanup liens in connection with the Property, and he provided a link to the USEPA cleanup information (<https://www.epa.gov/il/pillsbury-mills-llc-removal-site>). The USEPA information documents environmental cleanup actions and a court injunction for further scrapping work at the Property due to uncontrolled release of asbestos to the environment. However, no details regarding liens or confidential enforcement information were available in the online files. USEPA records are discussed further in Section 6.10.

4.3 Specialized Knowledge

In some cases, specialized knowledge of a site or experience with a particular operation may be material to identifying RECs in connection with the Property and/or adjoining sites.

According to Mr. Richmond, he has no specialized knowledge or experience related to the Property or adjoining sites.

4.4 User-Provided Commonly Known or Reasonably Ascertainable Information

According to Mr. Richmond, the Property was historically used for food manufacturing, grain storage, and flour milling. He reported knowledge of specific chemicals on the Property, including the past presence of chlorine and current presence of asbestos and lead paint. Mr. Richmond cited the USEPA cleanup website for information pertaining to environmental cleanups on the Property. USEPA records are discussed further in Section 6.10.

4.5 Valuation Reduction for Environmental Issues

If the purchase price of the Property does not reasonably reflect the fair market value of the Property or comparable properties, if not contaminated; it is the responsibility of the User of a Phase I ESA to identify an explanation for the lower price. It must also be considered whether the lower purchase price is because contamination is known or believed to be present at the Property. According to Mr. Richmond, the purchase price does not reasonably reflect the fair market value because they are aware that there is known contamination on the Property.

4.6 Owner, Property Manager, and/or Occupant Information

According to the Sangamon County Assessor, the Property is currently owned by:

- PM LLC (1208 Chimney Rock Ct Sherman, IL) - PIN 14260101001
- PM LLC 1525 LLC (130 N State St North Vernon, IL) - PINs 14260152001 - 14260152012
- Sangamon County Trustee (PO Box 96 Edwardsville, IL) - PINs 14270235001, 14270278001, 14270282001

The User Questionnaire identifies Mr. Jim Morgan, IEPA Attorney, as the Property manager/contact.

4.7 Reason for Performing Phase I ESA

According to Mr. Richmond, the Phase I ESA is being completed to qualify for limited landowner liability protection and potential grant funding sources.

4.8 Degree of Obvious Indicators of Contamination

According to Mr. Richmond, the USEPA cleanup information link provides information pertaining to the presence or likely presence of contamination on the Property. USEPA records are discussed further in Section 6.10.

4.9 Additional User-Provided Information

The User provided a Phase I ESA completed by Courtice|Grason on behalf of Ley Properties Management, Inc. on April 4, 2008 (2008 Phase I ESA). The 2008 Phase I ESA references an Environmental Assessment Report completed by Dames & Moore on February 8, 1991 (1991 Environmental Assessment), which includes details of inspection observations in each building and information obtained via interviews with site personnel while the facility was operating. Select information from the prior environmental reports is summarized below.

1991 Environmental Assessment (Dames & Moore)

The report describes the facility as a complex of buildings including milling, manufacturing, warehouse, and office areas, totaling approximately 850,00 square feet of processing and warehouse space. The buildings were reported to be mostly contiguous on the first and second floors, with several buildings containing multiple stories and basements. Interviews were completed with the Milling Superintendent, Maintenance Superintendent, Plant Manager, Quality Assurance Manager, and various other individuals at the facility. The following information was obtained by personnel interviews and/or during the site reconnaissance for the 1991 Environmental Assessment:

- Pesticides were used to treat grain in the elevators. Pesticides were applied by certified fumigators and authorized by Illinois Department of Public Health (IDPH) permit. Pesticides used at the site included Vapona™ (5700 lb/year), Phosphine (250 lb/year), Talon-G™ (150 lb/year), BP-100™ (<100 lb/year), Tempo™ (31 lb/year), Pyrid™ (12 lb/year), and Dri-Die™ (<10 lb/year). Pesticides were stored at the north end of Warehouse 6 in a locked storage room and in the C-Mill basement.
- Other chemicals and hazardous waste storage locations observed at the facility include:
 - Methyl ethyl ketone stored in the basement of the C-Mill building and used in small quantities on packing machinery equipment.
 - Lubricating oils stored in small containers on the second floor of the A/B Mill and used for equipment cooling and/or lubrication.

- 10-gallon cans of paint stored in a flammable storage cabinet at the north end of the ninth floor of the A/B Mills and used for maintenance.
- Naphtha solvent, antifreeze, oil, and automatic transmission fluid stored in drums on a rack in the forklift repair shop.
- Waste oil, waste coolants, and paint/solvent mixtures stored on a metal drip tray in a hazardous waste accumulation area against the south exterior of the forklift repair shop.
- 1,1,1-trichloroethane, hydraulic fluid, lubricating oils, coolants, cleaning chemicals, and automatic transmission fluid in drums and 10-gallon containers in a hazardous material storage enclosure in the hallway in the south end of the Grocery Mix building basement.
- Waste oil, waste coolants, and oil in drums in a hazardous waste storage area on the east side of the basement underneath Warehouse 3.
- Laboratory chemicals in a storage closet and flammable storage cabinets in the laboratory area above Warehouse 8.
- Water treatment chemicals including sodium hydroxide, cyclohexylamine, sodium polyacrylate, and sodium bisulfide stored in the boiler room; and biocides and sodium hydroxide stored in the main compressor room on the east side of the basement below Warehouse 3.
- Compressor oil and lubricating oil stored in drums on a rack in the main compressor room.
- Several areas of floor staining and/or discharge into floor drains from leaking containers and/or equipment were observed throughout the facility, including (but not limited to) the west wall and southwest portion of the C-Mill basement, portions of the 8180 Building, a portion of the Bakery Mix building basement, and the main compressor room in the basement of Warehouse 3. Staining and leaking fluids generally appeared to be lubricating oils.
- A 100,000-gallon aboveground surge tank was used to store water from the facility drains before release to the sanitary sewer.
- The power substation on the west end of the south portion of the Property included a “NO PCBs” sticker on the large transformer. Similar non-PCB stickers were observed in several interior electrical equipment rooms. The Maintenance Superintendent reported that all liquid-cooled electrical equipment was tested annually for PCBs as part of a company-wide program, and any PCB-containing fluids were replaced with non-PCB fluids.

- An out of use incinerator was located in the boiler room and was used for a short time to burn solid waste for heat.
- According to a long-time employee, no on-site disposal of waste of any kind has occurred on the Property.
- Four (4) 15,000-gallon USTS of unknown age were abandoned in place in 1990. The tanks had been out of service since approximately 1973.

2008 Phase I ESA (Courtice / Grason)

The 2008 Phase I ESA reports that Cargill Incorporated (current owner at the time of the assessment) acquired the Property from The Pillsbury Company in 1991. The facility was abandoned/not in use at the time of the assessment. The report references the 1991 Environmental Assessment rather than providing detailed descriptions of the facility.

However, the 2008 Phase I ESA reports the following additional information:

- The facility was historically heated by two (2) natural gas-fired steam boilers which distributed steam via tunnels and piping.
- The fuel oil lines were not removed during UST abandonment in 1990, and fuel oil appeared to be trapped in the lines. In addition, the sampling completed at the time of the UST abandonment did not include analysis of a full range of compounds associated with heavy distillate fuel oils.
- A network of cast iron and vitrified clay piping collected sanitary and process wastewater and discharged to a south and north metering pit. An oil and grease trap was located on the northwest side of the C-Mill Building for the 8180 Building's discharge. Prior to 1973, the pits were connected to the municipal sanitary sewer and discharged to the system without a permit. In 1973, the facility converted the metering pits to wastewater pumping stations which pumped wastewater to a 100,000-gallon above ground surge tank for controlled discharge. The wastewater was filtered at the pumping stations using influent wet wells (8 feet in diameter, 10 feet deep). Approximately 400 feet of sanitary piping was disconnected from the municipal sewer line on the west side of the Property (beneath Warehouse 9) when the surge tank system was constructed. The piping may not have been properly abandoned.
- Steel sanitary pipe at the facility was historically coated with bitumastic paints, which have the potential to contain asbestos.

- During the site inspection, staining and discoloration were observed near the southeast Property line, near stockpiled railroad ties believed to be associated with the northeast adjoining railyard.

In summary, the 2008 Phase I ESA identified the following Potential Recognized Environmental Conditions (PREC)s in connection with the Property:

- Flow of oily water and other contaminants through site's sanitary system, with specific areas of concern including the abandoned grease and oil trap, abandoned sanitary sewer piping, and pumping station wet wells.
- Exterior accumulation of welding fume particles
- Abandoned fuel oil tanks.
- Off-site contamination concerns from stockpiled railroad ties

The 2008 Phase I ESA, which includes the 1991 Environmental Assessment as an attachment, are provided in Appendix 2.

5.0 RECORDS REVIEW

5.1 Standard Environmental Record Sources

The review of federal, state, local and tribal environmental records for the Property was completed using Environmental Data Resources, Inc. (EDR). Sites located within the standard search radii of the specific regulatory database, with reported or suspected environmentally sensitive issues, have the potential to adversely impact the Property. The direct potential for adverse environmental impact generally arises from the subsurface migration of contamination from these sites into the soils of, or groundwater flowing beneath the Property. In addition, there is a potential indirect and adverse impact from negative perceptions associated with the proximity to a contaminated site, which may affect the fair market value of the Property. In addition to the regulatory database search, EDR provides a map section that depicts a visual representation of the Property's location, any surrounding mapped sites identified within the search radius with potential environmental conditions, and a detailed data report about each mapped site.

Furthermore, the EDR database review covers additional supplemental federal, state, local, and tribal databases that contain properties with potentially environmentally sensitive conditions. EDR updates its databases on a monthly or quarterly basis, depending on the release of each related government database. The report meets the government records search requirements, including the approximate minimum search distances of ASTM E1527-13. A copy of The EDR Report is included in Appendix 3 of this document.

The number of sites identified by the EDR Report within the specified search radius, per reviewed regulatory database, is presented in Table 3 below. EDR's standard search radius for multiple databases is slightly greater than the required minimum search distance under ASTM E1527-13. The table also includes supplemental databases provided by EDR. This table is the same as found in the EDR report, however, only those sites that are within the ASTM-minimum search distance and those sites outside the ASTM search radius that were determined to be significant will be discussed in this section. This section will also discuss those sites found by Fehr Graham through other means to have been missed by the electronic records search, if any. The approximate minimum search distance of the standard environmental record sources for the Property was not increased for this Phase I ESA.

**Table 3 - Standard Environmental Record Summary and
Approximate Minimum Search Distances**

Standard and Supplemental Environmental Record Sources	EDR Search Distance (miles)	ASTM E1527-13 Minimum Search Distance (miles)	Number of Sites Found Within EDR/ASTM Minimum Search Distance (miles)
Federal Records			
NPL	1.0	1.0	0
Proposed NPL	1.0	1.0	0
NPL Liens	Property only	Not specified	0
Delisted NPL	1.0	0.5	0
SEMS (formerly CERCLIS)	0.5	0.5	Property (1) + 2
Federal Facility	1.0	Not specified	0
SEMS-ARCHIVE (formerly CERCLIS-NFRAP)	0.5	0.5	1
RCRA CORRACTS	1.0	1.0	4
RCRA TSDF	0.5	0.5	0
RCRA - LOG	0.25	Property & adjoining property	0
RCRA - SOG	0.25	Property & adjoining property	0
RCRA - VSQG	0.25	Property & adjoining property	2
US ENG CONTROLS	0.5	Property only	0
US INST CONTROLS	0.5	Property only	0
LUCIS	0.5	Not specified	0
ERNS	Property only	Property only	Property (1)
State and Local Records			
IL SSU	1.0	0.5	2
State SWF/Landfill	0.5	0.5	3
IL LF Special Waste	0.5	0.5	0
IL NIPC	0.5	0.5	0
IL CCDD	0.5	0.5	0
LUST	0.5	0.5	14

Standard and Supplemental Environmental Record Sources	EDR Search Distance (miles)	ASTM E1527-13 Minimum Search Distance (miles)	Number of Sites Found Within EDR/ASTM Minimum Search Distance (miles)
LUST TRUST	0.5	0.5	1
UST	0.25	Property & adjoining property	Property (1) + 1
FEMA UST	0.25	Property & adjoining property	0
IL ENG Controls	0.5	Property only	1
IL INST Controls	0.5	Property only	1
IL SRP	0.5	0.5	3
IL Brownfields	0.5	0.5	5
Additional Environmental Records			
US BROWNFIELDS	0.5	Not specified	2
ODI	0.5	Not specified	0
Debris Region 9	0.5	Not specified	0
US CDL	Property only	Not specified	0
IL CDL	Property only	Not specified	0
US Historic CDL	Property only	Not specified	0
LIENS 2	Property only	Not specified	0
HMIRS	Property only	Not specified	0
IL SPILLS	Property only	Not specified	0
IL SPILLS 90	Property only	Not specified	0
RCRA - NonGen	0.25	Not specified	Property (1) + 2
DOT OPS	Property only	Not specified	0
DOD	1.0	Not specified	0
FUDS	1.0	Not specified	0
CONSENT	1.0	Not specified	0
ROD	1.0	Not specified	0
UMTRA	0.5	Not specified	0
US MINES	0.25	Not specified	0
TRIS	Property only	Not specified	0

Standard and Supplemental Environmental Record Sources	EDR Search Distance (miles)	ASTM E1527-13 Minimum Search Distance (miles)	Number of Sites Found Within EDR/ASTM Minimum Search Distance (miles)
TSCA	Property only	Not specified	0
FTTS	Property only	Not specified	Property (1)
HIST FTTS	Property only	Not specified	Property (1)
SSTS	Property only	Not specified	0
ICIS	Property only	Not specified	0
PADS	Property only	Not specified	0
MLTS	Property only	Not specified	0
RADINFO	Property only	Not specified	0
FINDS	Property only	Not specified	Property (2)
ECHO	Property only	Not specified	Property (1)
RAATS	Property only	Not specified	0
RMP	Property only	Not specified	Property (1)
IL NPDES	Property only	Not specified	0
IL UIC	Property only	Not specified	0
IL HWAR	Property only	Not specified	0
WI MANIFEST	0.25	Not specified	0
IL DRYCLEANERS	0.25	Not specified	0
IL IMPDMENT	0.5	Not specified	0
IL AIRS	Property only	Not specified	Property (1)
IL TIER 2	Property only	Not specified	0
SCRD DRYCLEANERS	0.5	Not specified	0
IL BOL	Property only	Not specified	Property (1)
IL ASBESTOS	Property only	Not specified	Property (1)
IL PIMW	0.25	Not specified	0
IL Coal Ash	0.5	Not specified	0
IL Financial Assurance	Property only	Not specified	0
Lead Smelters	Property only	Not specified	0
Coal Ash EPA	0.5	Not specified	0

Standard and Supplemental Environmental Record Sources	EDR Search Distance (miles)	ASTM E1527-13 Minimum Search Distance (miles)	Number of Sites Found Within EDR/ASTM Minimum Search Distance (miles)
Coal Ash DOE	Property only	Not specified	0
PCB TRANSFORMER	Property only	Not specified	0
2020 COR ACTION	0.25	Not specified	0
EPA WATCH LIST	Property only	Not specified	0
US AIRS	Property only	Not specified	0
PRP	Property only	Not specified	0
US FIN ASSUR	Property only	Not specified	0
Indian Reservations	1.0	Not specified	0
Indian LUST	0.5	0.5	0
Indian UST	0.25	Property & adjoining property	0
Indian VCP	0.5	0.5	0
Indian ODI	0.5	Not specified	0
EDR Proprietary Records			
MGP (Manufactured Gas Plants)	1.0	Not specified	1
US Hist Auto Stat	0.25	Not specified	1
US Hist Cleaners	0.25	Not specified	0
Orphan Sites			0

All the above environmental records were reviewed, and only those records found to present significant environmental findings in connection with the Property are discussed further in this section. Each of the listings can be found in the EDR Radius Map Report located in Appendix 3. Records that will not be discussed further include records noting:

- The presence of an off-site UST or AST with no evidence of a release or the threat of release [Databases: AST, UST, INDIAN AST, INDIAN UST]
- A site at a distance of greater than 0.1 miles that formerly had a leaking petroleum UST or leaking petroleum AST that has been properly reported, investigated, and remediated under the oversight of the appropriate state or federal agency, where the oversight agency has formally closed the site, and where the site is at a sufficient distance or the contaminants of concern are of the type where vapor migration onto the Property is not a concern [Databases: LUST, LAST, INDIAN LUST, INDIAN LAST]

- A site where there is a history of hazardous or PCB wastes being generated provided that there is no record of a release or a serious violation that could have led to a release [Databases: RCRA-LQG, RCRA-SQG, RCRA-CESQG, RCRA-NonGen, Manifest, PADS]
- A site where the database finding indicates that the facility completed actions required by environmental regulations or statutes with no indication that there was a release or a threat of a release to the environment (Databases: FINDS, AIRS, TRIS, TIER 2, ICIS, IL BOL, NPDES]
- Other sites where the listing makes no note of a release or a threat of a release may not be discussed based upon the judgment of the environmental professional; or where the site is at a distance from the Property or the hydrogeological gradient would not promote contamination migration toward the Property [SEMS, CORRACTS, SHWS, BROWNFIELDS]
- Sites beyond one-quarter (1/4) mile of the Property that are closed by the agency and for which there are activity and use limitations (AUL) or listings on IEPA databases, unless in the opinion of the environmental professional, a particular site beyond this distance merits discussion based upon the nature of the contaminants or other significant site-specific conditions [Databases: IL INST Controls, IL ENG Controls] [Under certain circumstances the Databases may also include: SPILLS]

Property Information

Site Name: Cargill, Inc.; Pillsbury Mills	Distance/direction from Property: Property
Address: 1525 East Phillips Street	Database: FINDS (2), ECHO, ERNS, RCRA NonGen/NRL, FTTS, HIST FTTS, UST, SEMS, AIR, ASBESTOS, BOL, RMP
<p>RCRA NonGen/NLR: The facility is identified on the Resource Conservation and Recovery Act (RCRA) Non-Generator / No Longer Regulated (NonGen/NLR) database as a historical large quantity generator (LQG) of hazardous wastes. The database identifies the facility as a LQG beginning in 1989 or earlier and ceasing waste generation prior to 2002. Wastes associated with the facility included undefined waste (D000), ignitable waste (D001), and spent nonhalogenated solvents (F003, F005). The facility received multiple violations in February 1992 which were resolved before December 1992.</p>	
<p>FTTS, HIST FTTS: The facility is listed on the FIFRA/TSCA (Federal Insecticide, Fungicide, and Rodenticide Act / Toxic Substance Control Act) Tracking System (FTTS) and Historical FTTS (HIST FTTS) databases due to a TSCA Section 6 PCB inspection conducted by the state in 1994. No violations were reported.</p>	
<p>UST: The facility is identified in the Office of the Illinois State Fire Marshal (OSFM) underground storage tank (UST) database under facility number 5017953. The UST database identifies four (4) 15,500-gallon tanks abandoned in place on May 1, 1990. The contents were not reported, and no additional information was listed in the database. As a result of the UST listing, a FOIA request was submitted to the OSFM for additional information. FOIA information is discussed further in Section 6.7.</p>	
<p>SEMS: The Property is listed in the Superfund Enterprise Management System (SEMS) database as a removal only site. No assessment work was needed, and it was not listed on the National Priorities List (NPL). The SEMS listing was initiated in 2017.</p>	

Site Name: Cargill, Inc.; Pillsbury Mills	Distance/direction from Property: Property
Address: 1525 East Phillips Street	Database: FINDS (2), ECHO, ERNS, RCRA NonGen/NRL, FTTS, HIST FTTS, UST, SEMS, AIR, ASBESTOS, BOL, RMP
<p>RMP: The facility is listed in the Risk Management Plans (RMP) database associated with a Risk Management Plan on file for the chlorine system. The database reports 20,000 pounds of chlorine in the facility operations.</p> <p>ERNS: The site is listed on the Emergency Response Notification System (ERNS) database associated with an incident on September 2, 1998 (453607) due to a release of 1176 pounds of propane released to the atmosphere as a result of a propane storage tank valve left open.</p> <p>ASBESTOS: The site is listed on the Asbestos database associated with asbestos cleanup in 2017.</p> <p>FINDS, ECHO, BOL, AIRS: The Federal Index System (FINDS), Enforcement and Compliance History Online (ECHO), Bureau of Land (BOL), and IL AIRS databases and/or general compliance are related to the above database listings and provide no additional significant information.</p> <p>IEPA Document Explorer: In addition to the EDR database listings, a search for additional records was conducted using the online IEPA Document Explorer database. Records available on the online database include the following:</p> <ul style="list-style-type: none"> Recorded deed transferring Property from Cargill, Incorporated to Ley Properties Management, Incorporated, April 11, 2008. Request for time-critical removal assessment and possible removal action for asbestos containing materials. Determination of Applicable, Relevant, and Appropriate Requirements Inspection notes November 1, 2017 for final removal of hazardous materials by USEPA. The notes indicate there were several pallets of non-hazardous material left in the building. Environmental Assessment Report, Dames & Moore (February 6, 1991) (discussed in Section 4.9) <p>A FOIA request was submitted to IEPA for additional records. FOIA information is discussed further in Section 6.8.</p>	

Adjoining Sites

Site Name: Chicago & IL Midland Railway Company; C&IM RR	Distance/direction from Property: Northeast adjoining
Address: 15 th & North Grand Avenue East	Database: UST, LUST, SRP, SPILLS, AIRS, BOL, RCRA-VSOG
<p>UST: The site is identified in the OSFM UST database with the following removed tanks:</p> <ul style="list-style-type: none"> 1,000-gallon gasoline installed 1953 and removed 1989. 12,000-gallon diesel installed 1955 and removed 1989. 1,000-gallon gasoline installed 1980 and removed 1989. 3,000-gallon used oil installed in 1988 and removed in 2019. 4,000-gallon used oil installed in 1956 and removed in 1988. <p>Two (2) release incidents are listed (Incident Nos. 89-1675, 19-1098).</p>	

LUST, SPILLS: The site is listed in the leaking UST (LUST) database due to a release of gasoline and diesel reported on August 31, 1989 and a release of used oil reported on October 23, 2019. The IEPA issued a No Further Remediation (NFR) determination for the 1989 release on October 16, 1990, but the 2019 release has not received closure. The site is listed in the SPILLS database associated with the 2019 LUST incident.

RCRA-VSQG: The site is listed in the RCRA database as a very small quantity generator (VSQG) of hazardous waste. The site was listed as a hazardous waste generator since 1989 and received violations in 2008. Wastes associated with the site include corrosive waste (D002).

SRP: The site was enrolled in the IEPA Site Remediation Program (SRP) on May 30, 1991. The SRP enrollment is listed as active.

IEPA Document Explorer: Due to the LUST and SRP database listings, a search for additional records was conducted using the IEPA Document Explorer database. Recent records for the site available on the online database include a Focused Site Investigation Report, Remedial Objectives Report, and Remedial Action Plan Addendum (FSIR-ROR-RAP Addendum) (Aerostar SES LLC, February 2020). The FSIR-ROR-RAP Addendum includes only the east portion of the railyard site (not directly adjoining the Property). Subsurface investigations were performed in this area between 1989 and 2020 and identified polynuclear aromatic hydrocarbons (PNAs), volatile organic compounds (VOCs) and metals in soil and groundwater above IEPA Tier 1 remediation objectives, with primary issues consisting of iron and manganese in groundwater. In addition, free product was found in one (1) monitoring well (MW-2, approximately 500 feet northeast of the Property boundary) over several gauging events between 2014 and 2018. A free product investigation identified that the free product was localized. The free product was removed using an absorbent sock in the monitoring well and several gauging events between 2018 and 2020 identified no free product in the well. Groundwater flow was demonstrated to be southeasterly across the site, and modeled contaminant transport in groundwater is not anticipated to extend side-gradient towards the Property. However, the FSIR-ROR-RAP Addendum was not approved by the IEPA and additional contaminant fate and transport modeling is required. In addition, older records in the IEPA file for the site indicate other areas of concern that do not appear to be addressed in the FSIR-ROR-RAP Addendum, including a diesel pipeline spill area, fueling area, and miscellaneous surface spills.

Online LUST records identify that the 2019 release incident occurred from a 3,000-gallon UST located along the east site boundary (near North 19th Street). The UST removal sampling identified no detected concentrations of petroleum compounds above IEPA Tier 1 objectives; however, several detection limits were above remediation objectives and the IEPA denied the sample results based on laboratory quality control issues. The incident has not been closed.

Detailed records for this site are not included in the appendices of this report but may be accessed online through the IEPA Document Explorer website under site number 1671205168.

Further discussion regarding the potential for contamination on the Property resulting from the northeast adjoining site is provided in Section 9.

Near Proximity Sites

Several nearby sites were identified in the environmental database listings. Each listing was reviewed for potential to impact the Property. Based on the type of listing, regulatory status, distance from the Property and/or direction with respect to the presumed hydrogeologic gradient, none of the listings on nearby sites indicate the potential for RECs on the Property and do not warrant further discussion.

Orphan Sites

Orphan sites are database listings which may be in the vicinity of the Property, but the location has not been confirmed due to poor or inadequate address information. No orphan sites were found in the EDR Radius Report for the Property.

6.0 HISTORICAL LAND USE REVIEW

Historical sources have been consulted to develop a history of the previous uses of the Property and surrounding area to help identify the likelihood of past uses having led to RECs in connection with the Property. The objective of consulting historical sources is to identify previous uses of the Property back to the Property's first developed use, or back to 1940, whichever is earlier. An attempt to review the following historical sources was made to determine past development and uses of the Property. The earliest historical data source located for the Property and surrounding areas was the 1907 topographic map.

6.1 Historical Sanborn Fire Insurance Maps (Sanborn Maps)

Sanborns were created for insurance underwriters and often contain information regarding the uses of individual structures, and the locations of underground storage tanks and chemical storage rooms throughout particular structures. Sanborn maps dated 1917, 1950, 1952, 1960, 1964, 1966, and 1972 were obtained from EDR and reviewed for the Property and adjoining sites. Below is a summary of the significant features identified. See Appendix 5 for a copy of the Sanborn Maps that were reviewed.

6.1.1 Property Use

Year(s)	Use
1917	The main parcel of the Property appears to be vacant except for a small area labeled "grandstand" near the southwest corner of the parcel. The southeast parcels are developed with multiple single-family dwellings. The west parcels appear to be vacant.
1950-1952	<p>The main parcel of the Property is developed with a large industrial facility identified as Pillsbury Flour Mill Springfield Plant. The facility includes several buildings, railroad spurs, and approximately 160 above ground grain storage silos. The structures include a flour mill (built 1929) and attached finished stock warehouse No. 4 which adjoin the storage tanks (built 1929-1933); cereal mill (built 1929) and flour mill (built 1935) connected by finished product warehouses no. 1 and no. 2; and a processing, raw stock, storage, and office building. An outline for a "future office" is depicted in the southwest corner of the main parcel, and scales and a small garage are depicted in the north-central portion of the parcel. Two (2) buried fuel oil tanks are depicted along the railroad siding near the corner of E. Phillips Street and N. 16th Street.</p> <p>The southeast parcels appear to be vacant except for portions of the railroad tracks which enter the southeast corner of the Property, separate into several spurs, and join again before exiting at the northern point of the main parcel. The west parcels appear to be vacant.</p>
1960-1966	The Property is not depicted.

Year(s)	Use
1972	The main parcel of the Property is identified as Pillsbury Mills Inc. A large structure labeled as shipping is depicted in the west-central portion of the parcel, connecting the office/storage/professing building to one of the flour mill buildings, and appears to be built over multiple rail spurs. No other significant changes are noted.

6.1.2 Adjoining/Near Proximity Sites Use

North and East Adjoining/Near Proximity Sites	
Year(s)	Use
1917	The area to the northeast of the Property is not depicted; however, a rail line labeled as the Chicago Pacific and St. Louis Railroad appears to enter the northeast adjoining site from the north. The area to the north of the northernmost portion of the main parcel is depicted as the North Grand Avenue East right-of-way with intersecting railroad tracks, followed by a park and residential properties.
1950	The area to the northeast of the Property is identified as "full of railroad tracks", with few buildings depicted further to the northeast, at the edge of the map.
1952	The area to the northeast of the Property is depicted as Chicago & Illinois Midland Railroad with a reference to a different sheet for details. Few buildings are depicted further to the northeast, including an office, record storage, lumber building, maintenance building, car inspector building and scale house. A tank is depicted near the car inspector building and scale house, approximately 300 feet northeast of the Property boundary.
1960-1966	The area to the northeast of the Property is not depicted. The area to the north of the northernmost portion of the main parcels is still depicted with North Grand Avenue East right-of-way followed by residential properties and a park.
1972	The area to the northeast of the Property appears generally as it does in the 1952 Sanborn map.

South Adjoining/Near Proximity Sites	
Year(s)	Use
1917-1952	The area to the south of the Property is depicted with single-family residences.
1960-1966	The area to the south of the Property is not depicted.
1972	The area to the south of the Property is depicted with single-family residences.

West Adjoining/Near Proximity Sites	
Year(s)	Use
1917-1952	The area to the west of the Property is depicted with single-family residences.
1960-1966	The area to the west of the Property is not depicted.

West Adjoining/Near Proximity Sites	
Year(s)	Use
1972	The area to the west of the Property is depicted with single-family residences.

6.2 Historical Aerial Photographs

Historical Aerial Photographs dated 1939, 1946, 1956, 1964, 1971, 1976, 1986, 1988, 1993, 1995, 1998, 2007, 2011, 2014, and 2017 were obtained from EDR and reviewed for the Property, adjoining, and near proximity sites. Below is a summary of the features identified. See Appendix 5 for a copy of the Aerials reviewed.

6.2.1 Property Use

Year(s)	Use
1939-1946	The Property is developed with an industrial facility on the main parcel, including at least four (4) buildings and a multitude of silos in approximately the current configuration. The southeast and west parcels appear to be vacant.
1956	The industrial facility appears to be expanded and the southeast and west parcels appear to be developed; however, individual features cannot be discerned due to the quality of the photograph.
1964-1998	The industrial facility on the main parcel consists of several large, adjoining structures; silos; and rail spurs entering from both the north and southeast. The rail spurs are not clearly visible after 1976. The southeast and west parcels appear to be parking lots for the facility, including truck parking on the northern west parcel between at least 1986-1988. A water tower or storage tank is visible in the southeast parcels beginning in 1976. The southwest corner of the main parcel is greenspace.
2007	The Property appears to be vacant. The buildings, silos, and parking lots appear generally as in the 1964-1998 aerial photographs.
2011-2014	The southeast parcels are depicted with miscellaneous parking and growing vegetation. The water tower or storage tank in the southeast parcels appears to be removed prior to 2014.
2017	Several of the structures on the main parcel have been removed. Additional vegetation has grown in on the southeast and west parcels.

6.2.2 Adjoining/Near Proximity Site Use

North and East Adjoining/Near Proximity Sites	
Year(s)	Use
1939-2017	The northeast adjoining site is depicted as a large railyard, including numerous tracks with frequently stopped trains and several buildings. Silos or storage tanks are visible in the southeast portion of the north adjoining site from at least 1956 to 2007. The surrounding areas to the north and east appear to consist of residential development.

North and East Adjoining/Near Proximity Sites	
Year(s)	Use
South Adjoining/Near Proximity Sites	
Year(s)	Use
1939-2017	The south adjoining sites and surrounding area to the south appear to consist of residential development. A small parking lot appears to adjoin the southwest parcel beginning in 1993.

West Adjoining/Near Proximity Sites	
Year(s)	Use
1939-2017	The west adjoining sites and surrounding area to the west appear to consist of residential development.

6.3 Historical City Directory Search

Historical City directories were typically produced annually and have the ability to provide listings of property occupants, arranged in-order by street addresses. Fehr Graham reviewed historical City Directories available through EDR for the years 1957 through 2017 in approximately five (5)-year increments. Below is a list of environmentally significant occupants and/or land uses identified on the Property or surrounding sites.

6.3.1 Property Use

Year(s)	Occupant/Use
1957	Pillsbury Mills, Inc.
1962	Pillsbury Co. flour
1967-1977	The Pillsbury Co. flour mill
1982-1987	Pillsbury Company flour mill
1992	The Pillsbury Co.
1995-2005	Cargill Flour Milling
2000	Foodliner Incorporated
2010-2014	Not listed

6.3.2 Adjoining/Near Proximity Site Use

North and East Adjoining/Near Proximity Sites	
Year(s)	Occupant/Use
---	East Grand Avenue Listings not searched

South Adjoining/Near Proximity Sites	
Year(s)	Occupant/Use
1957-2014	1500-1524 (even addresses) E. Phillips St.: Residential occupants or not listed except as noted below.
1995	1506 E. Phillips St.: Pillar Federal Credit Union
---	Matheny Avenue and North 17 th Street listings not searched
West Adjoining/Near Proximity Sites	
Year(s)	Occupant/Use
1957-2017	901-1321 (odd addresses) N. 15 th St.: Residential occupants except as noted below.
1957-1972	1301 N. 15 th St.: Wallace R J & Glen grain insp
1977,1992	1301 N. 15 th St.: Springfield Grain Inspection

6.4 FOIA Request from the City of Springfield Building Department

A FOIA request was submitted to the City of Springfield for Building Department records of environmental significance for the Property. A response was received from the City of Springfield indicating that the request was denied in part due to documents containing private information. Records received from the City of Springfield included diagrams of the facility showing building names and demolished building areas, building permit records, building code violations (including demolition without current permit), and environmental complaints (e.g., weeds, graffiti, garbage). The facility has numerous unresolved building code violations. In addition, the Administrative Zoning Secretary responded that the Zoning Department is not aware of open or active zoning violation cases at the Property.

6.5 FOIA Request from the City of Springfield Fire Department

A FOIA request was submitted to the City of Springfield for Fire Department records of environmental significance for the Property. A response was received from the City of Springfield indicating that the request was denied in part due to documents containing private information. Records received from the City of Springfield Fire Department include a fire incident report from November 30, 2018 describing a fire in a two-story building at the south end of the complex. The fire was extinguished with minimal fire damage reported. An additional fire report was filed on December 3, 2018 for an inspection, but no details were provided.

6.6 FOIA Request from the Sangamon County Health Department

A FOIA request was submitted to the Sangamon County Health Department for records of environmental significance for the Property. A response was received from Sangamon County indicate they have no records on file responsive to the request.

6.7 FOIA Request from the Office of the State Fire Marshal

A FOIA request was submitted to the OSFM for records of storage tanks on the Property. The OSFM records indicate that there are four (4) 15,000-gallon USTs abandoned in place on the Property. Three (3) of the tanks are located on the southwest side of the plant, on the south end of Warehouse 3 and were reportedly used for fuel oil for boilers. One (1) tank is located on the east side of the wheat elevators, between the railroad track and elevator and was reported used for heating oil for the wheat dryer. The OSFM approved a waiver to abandon the tanks in place due to impractical removal. The records indicate that the three (3) tanks on the southwest side are beneath the building structure and trash compactor and adjacent to railroad tracks; and the tank near the wheat elevators is adjacent to railroad tracks and train car pulling system. The USTs were emptied and cleaned between February 23 and March 9, 1990. 21,300 gallons of #5 (light) heating fuel were removed from the tanks on the southwest side of the plant, and 1,500 gallons of #2 heating oil were removed from the tank by the wheat elevator. Soil borings were completed at this time to evaluate soil and groundwater around the tanks for petroleum contaminants. Soil samples were analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) and groundwater samples were analyzed for BTEX and polynuclear aromatic hydrocarbons (PNAs). Analytical results identified no petroleum contamination in the samples. In addition, inspections of the tanks after cleaning revealed no observations of corrosion or pitting. The USTs were filled with sand and fly ash (inert material).

6.8 FOIA Request from the Illinois Environmental Protection Agency

A FOIA request was submitted to the IEPA for records of environmental significance for the Property. Files received from the IEPA include records of RCRA hazardous waste generation, complaints, inspections, air emission permitting/compliance, asbestos sampling and remediation, and various other documents. Due to the volume of records (over # pages), the IEPA FOIA response is not included in the appendices of this report; however, the records may be provided upon request. Select information identified in the reviewed documents are summarized below.

RCRA Hazardous Waste Operations

A RCRA generator number was assigned to the facility in 1984. Wastes identified at the Cargill facility in 1992 include waste oil from changing oil in machinery, paint and paint waste, lab

waste, waste solvent from parts washer, waste pesticides bags and boxes, waste flour/floor sweepings, asbestos from pipe insulation abatement, miscellaneous abandoned chemicals from prior operator (Pillsbury) in fourth floor of grocery mix building and drums in 8180 building. During a RCRA inspection completed in February 1992, the IEPA noted that some drums of unknown contents located in the 8180 Building appeared to have leaked, buckets with unidentified brown liquid had loose/open or no lids. Several violations were cited due to accumulation times, container management, and hazardous waste determinations. All the violations were resolved by November 1992.

A RCRA inspection was completed in September 2002, over a year after facility closure. During the inspection, small quantities of used oil accumulated in air compressors and fluorescent bulbs were the only wastes observed at the facility. The inspection report notes that a methamphetamine lab had been discovered at the facility (top of elevator Head House) the previous winter. The inspector observed asbestos-containing pipe and tank wrap in the boiler room, and two (2) drums of used oil in the basement of the old A&B Mill. No violations were cited because hazardous waste operations had been discontinued.

Complaints & Asbestos Contamination

- A complaint filed August 3, 2009 states that a semi-trailer full of tires has been located at the facility for 2-3 weeks. The owner was interviewed and stated the tires were being temporarily stored until disposal at the landfill. The IEPA required disposal within one week, which was completed.
- A complaint was filed on October 31, 2014 regarding potential asbestos-containing fugitive dust from demolition of buildings and improper salvage yard operations. The complaint investigation determined that there were no issues at that time.
- A complaint was filed in August 2015 alleging several thousand linear feet asbestos containing pipe wrap was removed over 8-9 months without respirators, cut with a utility knife and placed in garbage bags which are piled in building. The IEPA conducted investigation and asbestos sampling activities in 2016 and USEPA completed substantial asbestos remediation in 2017.

Miscellaneous Information

- A letter dated July 31, 1991 from Cargill, Inc. requests the name change associated with the IEPA identification number for the facility from The Pillsbury Company to Cargill Inc.

- A tax deduction certification from the IEPA for environmental remediation costs (dated March 25, 2009) certifies that there has been a release or disposal of a hazardous substance and that the site was not listed or proposed for listing on the NPL.

6.9 Environmental Liens and Land Title Records

Fehr Graham reviewed the Commitment for Title Insurance issued by Chicago Title Insurance Company for records of environmental significance. The title records identify the following information pertaining to environmental liens or land use restrictions:

- A federal lien under CERLCA was recorded January 2, 2018. The amount of the lien was not listed.
- The City of Springfield has a \$1,500 lien on the Property for removal of neglected weeds, grass, trees, or bushes, recorded February 10, 2020.
- The three (3) parcels located along the west side of the Property (designated Parcel 1 and Parcel 4 in the Commitment for Title Insurance) have a covenant and restriction that no structures may be erected.

In addition, the following information pertaining to environmental liens and land use limitations has been identified through alternate record sources:

- According to an article published by NPR Illinois on December 20, 2019, the USEPA placed a lien of approximately \$2 million on the Property for the asbestos remediation completed in 2017.
- Records available through the IEPA Sites with NFRs mapping application and Groundwater Ordinance Status Chart indicate that the Property is located with a groundwater use ordinance area established by the City of Springfield. In accordance with the ordinance, no potable water wells may be installed on the Property.

6.10 Additional Standard Historical Record Sources

Historical Topographic Maps

Historical topographic maps available through EDR were reviewed for the years 1907, 1930, 1940, 1950, 1965, 1971, 1976, 1998, and 2012.

Year(s)	Map Description
1907-1940	The Property appears to be largely vacant, with few residences in the southeastern parcels. The northeast adjoining site is depicted as a large rail yard and the surrounding area appears to consist of residential development.
1950-1976	Several large buildings and railroad tracks have been constructed on the Property. The railyard to the northeast has expanded and the surrounding area is shaded to indicate dense urban development.

Year(s)	Map Description
1998	Individual buildings are not depicted on the Property, which is shaded with the surrounding area to indicate dense urban development. Several rail spurs are depicted on the Property and the northeast adjoining site remains a railyard.
2012	No building detail is provided on the map.

USEPA Records

Additional information pertaining to the environmental conditions on the Property is available on the USEPA webpage dedicated to the "Pillsbury Mills LLC Removal Site"

(<https://www.epa.gov/il/pillsbury-mills-llc-removal-site#cleanup>). The USEPA documents report that the facility on the main parcel originally consisted of 26 buildings and was vacant since approximately 2006. The Property owners contracted scrapping and building demolition activities beginning in 2014 which took place with no (or grossly inadequate) abatement of asbestos and resulted in an uncontrolled release of asbestos to the environment. The IEPA and State Attorney General's Office secured a court injunction to prevent further site work. Following initial inspections and limited asbestos sampling, the IEPA requested US EPA assistance with addressing the widespread contamination.

The USEPA completed a time-critical removal action in 2017 to remove waste materials including approximately 2,200 tons of friable asbestos-containing construction debris, 1,160 cubic yards of friable asbestos-containing pipe wrap and boiler insulation, nine (9) 275-gallon totes of waste/fuel oil, three (3) 55-gallon drums of waste antifreeze, 3,700 fluorescent light bulbs, and 12 pounds of mercury.

7.0 SITE RECONNAISSANCE

7.1 Methodology and Limiting Conditions

Ms. Sarah Beam and Mr. Tim Hoff of Fehr Graham mobilized to the Property to conduct the site reconnaissance on April 1, 2021; however, upon arrival, the inspectors were notified that the Property owner denied access onto the Property. Ms. Beam and Mr. Hoff proceeded to complete a preliminary site reconnaissance by viewing the Property and surrounding sites from public rights-of-way. The preliminary site reconnaissance was initiated at approximately 9:30 a.m. Weather conditions were sunny with a temperature of approximately 35 degrees Fahrenheit with winds approximately 15 miles per hour from the north-northwest. The ground surfaces were dry. Photographs taken during the site reconnaissance are included in Appendix 6.

Limitations encountered during the site reconnaissance on the Property and surrounding land are as follows:

- Access to the Property for the site reconnaissance was not provided. The Property was inspected from right-of-way areas only.

7.2 General Site Setting

The Property is developed with a vacant industrial complex consisting of a conglomerate of interconnecting structures formerly used for grain milling, manufacturing, warehousing, and office (Property buildings), as well as silos for grain storage. Several buildings have been demolished since the time of facility operations. A layout map depicting the existing and former structures and their historical use is provided as the Site Layout in Appendix A. The facility was constructed in stages between 1929 and the mid-1950s and were constructed primarily of brick and masonry. The remaining grounds consist of areas of gravel, concrete, and grass, with several rail spurs. The facility is currently surrounded by security fencing. Portions of the Property outside the fence consist of a roadway (15th Street) and paved parking areas to the west of the facility, and a grassy area to the southwest of the facility. More detailed description of the Property, including interior observations, is not available since site access was not granted.

7.3 Underground Storage Tanks (USTs)

No equipment typically associated with UST systems was observed on the Property as viewed from the public rights-of-way.

7.4 Chemical Use, Aboveground Storage Tanks (ASTs), Drums, and Containers

One (1) AST was visible at the southwest corner of the former locker rooms at the south end of the Grocery Mix/Warehouse 3 building. The status, condition, and contents of the AST could not be determined as viewed from the public rights-of-way.

No other ASTs, drums or unidentified containers were observed on the Property as viewed from the public rights-of-way.

7.5 Waste Generation, Storage, and Disposal

The facility is currently vacant, with no known waste generation. Historical hazardous waste operations are discussed in Section 4.9, Section 5.1, and Section 6.8.

7.6 Stained or Disturbed Surfaces and Stressed Vegetation

The ground surfaces and vegetation could not be adequately assessed from the public rights-of-way.

7.7 Wastewater/Stormwater Run-off/Standing Water/Sumps/Pits/Ponds/Lagoons/Trenches

Stormwater run-off from the Property appears to flow into stormwater sewers located in the adjoining rights-of-way. No areas of standing water (e.g., pools of liquid, pits, ponds, or lagoons) were observed on the Property, as viewed from the public rights-of-way.

Interior drains, sumps, trenches, or other wastewater or stormwater infrastructure could not be assessed without authorized site access.

7.8 Potential Polychlorinated Biphenyls (PCB) Containing Equipment

One (1) pole-mounted electrical transformer was observed along the south Property border. The equipment was not observed to contain labels indicating the presence of PCBs in the equipment. A black or yellow warning sticker is required by federal regulations for equipment containing PCBs at concentrations of 50 parts per million (ppm) or greater. Labels may also be present indicating an electrical transformer is PCB-Free, if PCB content is less than 50 PPM. The public utility provider, as the owner of the transformer, is responsible for keeping the equipment in compliance with federal, state and local regulations and is typically liable for the cleanup of contamination resulting from leaking equipment, as necessary.

The potential presence of PCB containing equipment on the Property could not be adequately assessed from the public rights-of-way.

7.9 Readily Observable Suspect Asbestos Containing Building Material (ACBM)

ACBMs were primarily used in the construction of buildings prior to 1980. Based on historical records for the Property, ACBMs were used extensively throughout the Property buildings and were released to the environment through improper demolition and abatement practices. Friable ACBM were largely abated during US EPA removal actions in 2017; however, it is likely that ACBM are still present in the remaining buildings, which should be assessed prior to building demolition or renovation. No suspect ACBM was visible from the public rights-of-way.

7.10 Lead-Based Paint

Chipping and peeling paint was observed on exterior surfaces of the grain silos and portions of the buildings as viewed from the public rights-of-way. Based on the construction date of the facility, there is a potential for lead-based paint to be present. However, a formal lead-based paint inspection was not conducted as part of this Phase I ESA.

7.11 Observations of the Surrounding Sites

The east/northeast adjoining site was observed to be a large railyard. Piles of concrete, railroad ties, and other debris were observed in the southeast corner of the railyard, adjoining the Property.

The remaining surrounding sites appeared to be residential, with no visual environmental concerns.

8.0 INTERVIEWS

The objective of this section is to obtain reasonably ascertainable information from various individuals or groups to identify potential RECs in connection with the Property and/or surrounding sites. All written interviews and obtained documents generated by the interview portion of this Phase I ESA are included in Appendix 7.

8.1 Interview with Owner(s)

The owners of the Property were not available for interview. Please refer to Section 9.1.2 for discussion of the data gap relating to the owner interview.

8.2 Interview with Site Managers(s)

There are no current site managers for the Property.

8.3 Interview with Occupant(s)

There are no current occupants on the Property.

8.4 Interviews with Additional Government Officials

FOIA requests were not submitted to tribal entities, as no regional tribal regulatory authorities were identified in the EDR report as existing. No additional government officials were identified as necessary for interviewing purposes.

8.5 Interviews with Others

No additional interviews were warranted for the assessment.

9.0 FINDINGS/OPINIONS

The intent of this section is to identify findings and known or suspect *RECs*, *CRECs*, *HRECs*, *and de minimis conditions* on the Property and surrounding sites. In addition, this section includes any data gaps that significantly affect the ability of the Environmental Professional to identify potential RECs. Furthermore, this section allows the Environmental Professional to provide the rationale used to formulate opinions as to why a REC is suspected during this assessment.

9.1 Property

9.1.1 Records Review, Site Reconnaissance, Interviews

Historical Industrial Operations

Large-scale grain milling, manufacturing, and warehousing operations were conducted at the facility from approximately 1929 to 2001 and included the use of various hazardous materials and petroleum products including pesticides, lubricating oils, coolants, paints, solvents, water treatment chemicals, compressor oil, automatic transmission fluid, hydraulic fluid, antifreeze, and laboratory chemicals. The facility was historically listed as a large quantity generator of hazardous wastes including undefined waste (D000), ignitable waste (D001), and spent nonhalogenated solvents (F003, F005). IEPA records indicate that the facility was first registered as a hazardous waste generator in 1984. This assessment did not identify any records of waste handling prior to that time. RCRA inspection notes from 1992 identify specific waste streams at the facility, including waste oil from machinery, paint and paint waste, lab waste, waste solvent from a parts washer, waste pesticides bags and boxes, waste flour/floor sweepings, asbestos from pipe insulation abatement, and miscellaneous other chemicals. The IEPA identified several violations during the 1992 inspection due to accumulation times, container management, and hazardous waste determinations. **The storage and handling of hazardous materials and petroleum products for large scale manufacturing operations with a history of violations and over 40 years of operation prior to robust environmental regulation constitutes a REC to the Property.**

Several areas of floor staining and/or discharge into floor drains were observed throughout the facility during environmental inspections completed during prior assessments (1991, 2008). The facility drains historically discharged to two metering pits connected to the municipal sanitary sewer. In 1973, the metering pits were later converted to wet wells and pumping stations, sending effluent to a 100,000-gallon above ground surge tank for controlled discharge. The 2008 Phase I ESA (Courtice | Grason) identifies concerns associated with the wastewater discharge system including the use of vitrified clay piping, an oil and grease trap located on the northwest side of the C-Mill Building, potential buildup of oily wastewater in the wet wells, potentially improperly abandoned sanitary piping beneath Warehouse 9, and potential asbestos-containing bitumastic paints on steel pipes. **The apparent discharge of oils and/or other hazardous materials or petroleum products to drains within the facility due to leaking equipment and/or containers to the sanitary network of unknown integrity constitutes a REC.**

Abandoned USTs

Four (4) 15,000-gallon fuel oil USTs were abandoned at the Property in 1990. Three (3) USTs are located on the south end of Warehouse 3 and were reportedly used for fuel oil for boilers; and one (1) UST is located on the east side of the wheat elevators between the railroad track and elevator and was reportedly used for heating oil for the wheat dryer. The OSFM approved abandonment of the tanks in place because removal was determined to be impractical based on their location beneath buildings, railroad tracks, and other railroad infrastructure. The USTs were emptied and cleaned prior to being filled with inert material. Inspections of the tanks after cleaning revealed no observations of corrosion or pitting. Soil borings were advanced to evaluate soil and groundwater around the tanks for petroleum contamination. Soil samples were analyzed for BTEX and groundwater samples were analyzed for BTEX and PNAs. Analytical results identified none of the analyzed constituents above applicable objectives. However, not all samples were analyzed for compounds typical of fuel oils, and the 2008 Phase I ESA site inspection by Courtice | Grason reported that piping (potentially still containing fuel oil) was not removed during tank abandonment. **Given that the UST investigation sampling did not include all potential contaminants of concern and that the piping may not have been properly removed or abandoned, the former use of the four (4) 15,000-gallon USTs on the Property constitutes a REC.**

Railroad Tracks

Several sets of railroad tracks have been present on the Property since at least the 1940s. Four (4) sets of tracks are present along the east side of the facility and six (6) spurs lead through the complex to warehouse areas. The long-term use of railroad tracks and spurs on the Property presents to the potential for past releases of hazardous materials or petroleum products to the environment through leaching of chemicals from tracks and railroad ties, treatment of track areas with pesticides/herbicides, engine emissions, and/or leaks and spills during loading/unloading or damaged locomotives. **Therefore, the long-term use of the railroad tracks and spurs on the Property constitutes a REC.**

9.1.2 Data Gaps

Site Reconnaissance

The owner legally challenged IEPA's authority to grant legal access to the site and now access has to be resolved in court. A limited reconnaissance was completed from the public rights-of-way; however, an adequate inspection of the ground surface, areas behind or between buildings, and building interiors could not be completed. One (1) AST was visible, but the tank status, condition, and contents could not be determined due to the distance. Given the long-term historical industrial operations and that the site is vacant and frequently trespassed, there is potential for additional storage tanks, drums, waste dumping, or other evidence of releases of hazardous materials and/or petroleum products to the environment that cannot be observed without thorough inspection of the Property. **Therefore, the absence of a site reconnaissance due to denied Property access is considered a significant data gap.**

USTs depicted in Sanborn Maps

The 1950, 1952, and 1972 Sanborn Maps depicted two (2) buried fuel oil tanks on the Property, near the corner of East Phillips Street and North 16th Street. It is likely that these tanks are the same as the abandoned fuel oil tanks reportedly located at the south end of Warehouse 3; however, since they are depicted in a slightly different location it is possible that the Sanborn Maps depict additional USTs which have no record of removal or abandonment. **The potential presence of additional USTs on the Property which cannot be confirmed based on historical record sources constitutes a significant data gap.**

Owner Interview

The owners of the Property were not interviewed for this assessment due to the court proceedings associated with illegal asbestos removal. Based on the information available from other historical records sources, it is unlikely that an owner interview would alter the findings of this report. Therefore, the lack of owner interviews is not considered a significant data gap.

9.2 Surrounding Properties

9.2.1 Records Review, Site Reconnaissance, Interviews

Adjoining Railyard Operations

According to records on file with the IEPA, the northeast adjoining site has been operated as a railyard since the 1880s. The railyard operations reportedly have included administrative headquarters for the railroad, maintenance and repair of railroad cars and locomotives, rail switching, and transloading. A fuel tank is depicted near the scale house (approximately 300 feet northeast of the Property boundary) in historical Sanborn maps from at least 1952 to 1972, and database records indicate at least five (5) USTs containing gasoline, diesel, or used oil were installed between 1953 and 1988 and removed between 1988 and 2019. In addition, several above ground storage tanks are visible in historical aerial photographs, located on the eastern portion of the railyard from at least 1956 through 2007.

Two (2) leaking UST incidents have been reported at the railyard site, including a release of gasoline and diesel reported in 1989 (Incident 89-1675) and a release of used oil reported in 2019 (Incident 19-1098). The IEPA issued an NFR for the 1989 release, but the 2019 release has not received closure. The open LUST incident occurred from a 3,000-gallon UST located along the east side boundary, near North 19th Street. The UST removal sampling identified no detected concentrations of petroleum compounds above IEPA Tier 1 objectives; however, several detection limits were above remediation objectives and the IEPA denied the sample results based on laboratory quality control issues.

The site is also enrolled in the IEPA SRP for a limited area on the east side of the railyard site (near former above ground storage tanks). Soil and groundwater investigations completed from 1989 to 2020 have identified PNAs, VOCs, and metals in soil and groundwater exceeding IEPA Tier 1 remediation objectives, with primary issues consisting of iron and manganese in groundwater. In addition, free product was found in one (1) monitoring well (approximately

500 feet northeast of the Property boundary) over several gauging events between 2014 and 2018. A free product investigation identified that the free product was localized. After free product removal using absorbent socks, no product was measured in the well over several gauging events between 2014 and 2018. Groundwater flow was demonstrated to be southeasterly across the site, and modeled contaminant transport in groundwater is not anticipated to extend side-gradient towards the Property. However, the most recent report and contaminant modeling was not approved by the IEPA. In addition, older records in the IEPA file for the site indicate other areas of concern that do not appear to be included in the subsurface investigations completed for the SRP area, including a diesel pipeline spill area, fueling area, and miscellaneous surface spills.

During the site reconnaissance completed by Courtice | Grason in 2008 and by Fehr Graham in 2021, stockpiled railroad ties were observed near the southeast Property boundary with evident ground staining and discoloration.

Railyard operations have the potential to result in releases of hazardous materials and/or petroleum products to the environment through leaching metals from tracks and/or creosote or other chemicals from rail ties, pesticide or herbicide track treatments, engine emissions, and/or leaks and spills during train loading/unloading or engine maintenance and fueling. Environmental releases have been confirmed on the eastern portion of the site during investigations reported to the IEPA SRP. The reported contamination is not likely to migrate towards the Property based on the southeast direction of groundwater flow; however, it is likely that contamination may also be present in areas immediately adjoining the Property which were not included in the reported investigations. **Based on the presence of dense railroad tracks; apparent train stoppage, maintenance, and fueling operations; evidence of past releases to the environment; and observations of tracks and stockpiled rail ties directly adjoining the Property boundary, the long-term railyard operations at the northeast adjoining site are considered a REC to the Property.**

9.2.2 Data Gaps

No data gaps relevant to the identification of RECs on the Property were encountered on surrounding sites during this assessment.

In the opinion of Fehr Graham, additional investigation is appropriate to detect the presence of hazardous substances and/or petroleum products associated with the aforementioned RECs and significant data gap.

This additional investigation may include confirmation sampling of soil, soil gas, and/or groundwater. Further recommendations are beyond the scope of this Phase I ESA and can be discussed with the Environmental Professional based on the User's environmental needs and risk tolerance.

10.0 CONCLUSIONS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527 of the Former Pillsbury Plant located at 1525 East Phillips Street in Springfield, Illinois, the Property. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. This assessment has revealed the following Recognized Environmental Conditions in connection with the Property:

Property

- The storage and handling of hazardous materials and petroleum products for large scale manufacturing operations with a history of violations and over 40 years of operation prior to robust environmental regulation presents the potential for historical releases to the environment through undocumented spills and leaks and/or improper disposal of wastes.
- Based on the findings of prior assessments which were completed during the time of facility operations and included detailed site reconnaissance, there was historical discharge of oils and/or other hazardous materials or petroleum products to drains within the facility. Given the age of the facility and unknown integrity of piping, it is possible that discharges of hazardous materials and/or petroleum products to the sanitary network resulted in releases to the environment.
- Four (4) USTs were abandoned in place in 1990; however, UST investigation sampling did not include all potential contaminants of concern applicable for the historical tank contents, and the piping may not have been properly removed or abandoned. Therefore, historical operation of the USTs may have resulted in previously unidentified releases of petroleum products to the environment through tank or piping leaks or tank overfills.
- There is a potential for past releases of hazardous materials and/or petroleum products to have occurred from the long-term use of railroad spurs on the Property through leaching of chemicals from railroad spurs and ties, treatment of track areas with pesticides/herbicides, engine emissions, and/or leaks and spills during loading/unloading or idling of damaged locomotives.

Adjoining and Surrounding Sites

- There is a potential for past releases of hazardous materials and/or petroleum products from railyard operations on the northeast adjoining site to have migrated onto the Property and negatively impacted underlying soil, soil gas, and/or groundwater.

In addition, the following significant data gaps were encountered that have the potential to lead to the identification of additional RECs:

- The site reconnaissance could not be completed due to a last minute legal challenge to IEPA over site access that requires a court hearing to resolve. There is potential for storage tanks, drums, waste dumping, or other evidence of releases of hazardous materials and/or petroleum products to the environment which cannot be adequately assessed without Property access for reconnaissance.

- Two (2) buried fuel oil tanks are depicted on the 1950, 1952, and 1972 historical Sanborn Maps near the corner of East Phillips Street and North 16th Street. It is likely that these tanks are the same as the three (3) abandoned fuel oil tanks reportedly located at the south end of Warehouse 3. However, since the tanks are depicted in a slightly different location and the number of tanks is inconsistent, it is possible that the Sanborn Maps depicted additional USTs on the Property which have no record of removal or abandonment.

The following Business Environmental Risks (BERs) that exist beyond CERCLA liability may be associated with the Property:

- Asbestos containing building materials have been documented on the Property. Significant asbestos removal efforts were completed by US EPA; however, asbestos containing materials are anticipated to remain in portions of the facility and may exist in shallow soils as a result of documented improper building demolition activities.
- Based on the construction date of the Property buildings and silos, there is a potential for painted surfaces to contain lead above regulatory levels.

11.0 DISCLAIMER

This ESA was conducted as a reasonable and prudent investigation of the Property to provide the User with preliminary data necessary to make decisions concerning the environmental conditions of the Property. This assessment included a visual inspection of the Property, a survey of physical features, a records review, a review of reasonably ascertainable and likely useful historical records, and a survey of reasonably ascertainable and likely useful permits and enforcement data contained in regulatory agency files. This assessment is based on conditions found at the Property at the time of the site visit.

The results of the investigation do not exclude the possibility of the occurrence of any environmental hazard associated with the Property due to a large number of chemicals and substances that can be a threat to human health and the environment even when present in minute quantities. This assessment did not include non-scope investigations involving; biological agents; radon gas; radioactivity; lead in drinking water; electromagnetic fields; regulatory compliance; cultural and historical resources; industrial hygiene; indoor air quality unrelated to releases of hazardous substances or petroleum products into the environment; health and safety; ecological resources; endangered species; and wetlands. In addition, no sampling and/or intrusive investigation was completed. Furthermore, no evaluation was completed relating to environmental issues related to the use and production of controlled substances. A title records review was completed as a part of this assessment.

12.0 ADDITIONAL SERVICES

No additional services outside the scope of ASTM E1527-13 were contracted between the User and the Environmental Professional.

13.0 REFERENCES

The following published reference sources were consulted in the preparation of this Phase I ESA:

Berg, R.C., J.P. Kempton, and Keros Cartwright, 1984, Potential for Contamination of Shallow Aquifers in Illinois: Illinois State Geological Survey Circular 532, 30p.

ASTM E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

"Standards and Practice for All Appropriate Inquiry, Final Rule." Federal Register Vol. 70, No. 210 (01 November 2005):66070-66113.

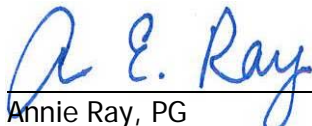
Internet Online References:

1. Illinois Office of the State Fire Marshal. March 24, 2021. <http://www.state.il.us/osfm/>
2. United States Department of Agriculture (USDA), Web Soil Survey. March 24, 2021. <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>
3. Sangamon County Parcel Viewer. March 23, 2021. <http://gismaps.co.sangamon.il.us/tpv/>
4. Illinois Environmental Protection Agency, Document Explorer. March 25, 2021. <http://external.epa.illinois.gov/DocumentExplorer>
5. Illinois Environmental Protection Agency, Leaking Underground Storage Tank Incident Tracking Database. March 25, 2021. <http://www.epa.illinois.gov/topics/cleanup-programs/bol-database/leaking-ust/index>
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7. United States Environmental Protection Agency, Pillsbury Mills LLC Removal Site. March 25, 2021. <https://www.epa.gov/il/pillsbury-mills-llc-removal-site>
8. Hansen, Mary. December 20, 2019. *Pillsbury Mills Owners Secure Site, Avoid Court Action*. National Public Radio Illinois. <https://www.nprillinois.org/post/pillsbury-mills-owners-secure-site-avoid-court-action#stream/0>

14.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in 312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a Property of the nature, history, and setting of the subject Property. We have developed and performed the AAI in conformance with the standards and practices set forth in 40 CFR Part 312.

We declare that any individuals listed below who do not qualify as an Environmental Professional and who assisted in conducting AAI did so under the supervision or responsible charge of a person that meets the definition of Environmental Professional as defined in 312.10 of 40 CFR 312.



Annie Ray, PG
Project Hydrogeologist

May 3, 2021

Date




Joel Zirkle, PG
Principal

May 3, 2021

Date


Additional individuals who assisted in conducting all appropriate inquiries under the supervision or responsible charge of a person meeting the definition Environmental Professional as defined in 312.10 of 40 CFR 312 include:



Sarah Beam
Project Engineer

May 3, 2021

Date



Tim Hoff
Hydrogeologist

May 3, 2021

Date

15.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

The qualifications of the Environmental Professionals and any other individuals responsible for conducting this Phase I ESA are in Appendix 8 along with the definition of Environmental Professional as defined in 312.10 of 40 CFR 312.

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