

PHASE I ENVIRONMENTAL SITE ASSESSMENT

ROBERT BROTHERS FARM

HIGHWAY 18

ST. JOHN THE BAPTIST PARISH, LOUISIANA

On Behalf Of:

Greenfield Louisiana, LLC

Prepared By:

**Ramboll US Corporation
New Orleans, Louisiana**

Date

June 2020

Project Number

1690016179

SIGNATURE AND ENVIRONMENTAL PROFESSIONAL STATEMENT

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

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



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1. SUMMARY OF CONCLUSIONS

Ramboll US Corporation (Ramboll) was retained by Greenfield Louisiana, LLC (Greenfield) to perform a Phase I Environmental Site Assessment (ESA) of the Robert Brothers Farm property located on Highway 18 in Wallace, Louisiana (herein referred to as the "property," or the "site"). Ramboll's assessment was conducted in connection with a potential purchase of the property. The objective of the Phase I ESA, which was conducted in conformance with the scope and limitations of ASTM International's *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* E1527-13 (the "ASTM Standard"), was to identify Recognized Environmental Conditions (RECs), as defined in the ASTM Standard (see Section 7).

1.1 Site Summary

A group of six individual limited liability companies, managed under a single entity named Robert Brothers Farm, LLC (Robert Brothers Farm or Robert Bros.) own the subject property in Wallace, Louisiana. The six-equal part-owning entities, according to site personnel, include: Donaldtec, Stephentec Rolandtec, Gayletec, Harry Robert Family llc, and A & T Robert Enterprises, llc. The site has been used for agricultural purposes since development. Since 2006, the group managed under Robert Bros. has owned the site and leased the site for agricultural purposes and industrial purposes.

1.2 Recognized Environmental Conditions

Ramboll performed a Phase I ESA of the site on Highway 18 in Wallace, Louisiana in conformance with the scope and limitations of the ASTM Standard. Any exceptions to, or deletions from, this practice are described in Section 6.2 of this report. This assessment has revealed no RECs in connection with the site.

1.3 Other Findings

Although not considered RECs, Ramboll identified the following notable other findings. The term "other finding" is not defined by ASTM; rather, Ramboll uses the term to connote areas of contingent risk that are not clearly defined by the ASTM Standard.

- **Past Use of Site for Residential Purposes and Agricultural Lands.** The site was previously used for agricultural purposes including sugar cane farming from at least the 1950s to the present day and historical documentation indicates dating as early as the late 1800s. During this time period, a few scattered residences and associated outbuildings were present on the northern portions of the site and other buildings were noted on the northeastern portion of the site. The residences and buildings may have used aboveground or underground fuel oil tanks for heating purposes and for farm vehicle fueling. Also, farming operations may have involved the application of arsenic and lead-based pesticides commonly used in the first half of the 20th century, or other organic pesticides commonly used thereafter. Facility personnel reported no knowledge of past use of any pesticides. Although this matter is not considered a REC, the potential presence of these compounds at the site cannot be ruled out. Ramboll notes that this matter is unlikely to result in regulatory scrutiny, assuming no changes to site use. Ramboll further notes that the use of such substances in this region (which is and has been historically widely used for sugarcane and soybean production) would have been fairly widespread and ubiquitous.
- **Site Railroad Operations.** A railroad line transects the southern portion of the site. The railroad line is still active in present day and historical topographic resources indicate it to be present since before 1892. Train cars are known to carry various items, such as chemicals and hazardous

substances; therefore, it is possible that small amounts of such substances traversed this spur and may have leaked from the railcars over time. However, during Ramboll's site investigation, no evidence of a past release was observed; therefore, this is not considered a REC.

A discussion of *de minimis* conditions identified during this review is presented in Section 6.1 of this report.

2. INTRODUCTION

2.1 Scope of Work

Ramboll conducted a Phase I ESA of the Robert Brothers Farm in Wallace, Louisiana. The Phase I ESA relied upon the references noted below and included the following tasks:

- A visit to the site by Alie Nicotera and Adam Goodine of Ramboll on June 15, 2020 and June 16, 2020 to observe the features of the site and to identify the uses and conditions specified in Sections 9.4.1 through 9.4.4.7 of the ASTM Standard. In addition, Ramboll observed the adjoining properties from the site or adjacent public thoroughfares. Photographs taken during the site visit are presented in Appendix A.
- An interview via telephone on June 29, 2020, with the following individual (year of initial hire at the site indicated in parentheses): Pete Graffagnino, Comptroller (2006). The aforementioned individual is referred to herein as “facility personnel”. The facility personnel interviewed by Ramboll were identified by Robert Bros. as having good knowledge of the uses and physical characteristics of the site.
- A review of information contained in federal and state environmental databases, as obtained from the sources noted below:
 - A radius report prepared by Environmental Data Resources, LLC (EDR, see Appendix B), which presents the results of searches of federal and state databases for the subject site, as well as properties near the subject site. The radius searched for each database, as well as the databases themselves, was selected in accordance with the ASTM Standard.
 - The United States Environmental Protection Agency’s (USEPA’s) Envirofacts database, which provides site information contained in multiple USEPA regulatory databases.
 - The USEPA’s Enforcement and Compliance History Online website, which search for facilities to assess their compliance with environmental regulations.
 - The Louisiana Department of Environmental Quality’s (LDEQ’s) Electronic Document Management System (EDMS), which contains official records that have been created or received by DEQ for sites.
 - The Louisiana Department of Natural Resources’ (LDNR’s) Strategic Online Natural Resources Information System (SONRIS), which provides mapping for registered water wells in Louisiana.
- A review of standard historical sources (included as Appendix C) and local agency inquiries, as defined in the ASTM Standard. The following resources were reviewed:
 - Readily available historical sources (as identified in Section 4.2 of this report and included as Appendix C) to develop a history of the previous uses of the site and surrounding area.

Historical and site-specific information obtained from the following local agencies: the St. John the Baptist Assessor’s Office (Assessor). Ramboll also requested information from the St. John the Baptist Fire Department, but personnel from these agencies reported having no information pertaining to the site. Ramboll attempted to contact the St. John the Baptist Health and Human Services Department; however, a response was not received.

- Facility personnel reported that, to their knowledge, no Phase II site investigations, environmental compliance audits, or similar investigations have previously been conducted for the site. Ramboll was provided with the following previous environmental assessment report, which is included as Appendix D:
 - *Phase I Environmental Site Assessment for Approximately 233 Acre Tract in St. John the Baptist Parish, LA*, prepared by Elos Environmental, LLC, dated November 2019 (the “2019 Phase I ESA report”);
- A review of physical setting sources, as defined in the ASTM Standard, including:
 - The current United States Geological Survey (USGS) 7.5-minute topographic map that shows the area on which the site is located.
 - Geologic, hydrogeologic, or hydrologic sources as provided in the environmental database report.

This assessment was conducted in accordance with the methodology specified in ASTM Standard E1527-13, as agreed upon by Ramboll and Greenfield in May 2020.

2.2 Significant Assumptions

In conducting this review, no significant assumptions were made, except for the following:

- Site-specific field measurements or other detailed hydrogeological information was not publicly available or reasonably ascertainable. In the absence of such data, Ramboll has assumed that the flow direction of shallow groundwater beneath the site and in the local vicinity generally mimics surface topography. Therefore, in evaluating potential on-site impacts from off-site sources, those off-site facilities not located adjacent to or within one-quarter mile upgradient of the subject site are not considered to represent a significant concern to the subject site. This interpretation is based on the assumption that a hazardous material released to the subsurface generally does not migrate laterally within the unsaturated soil for a significant distance, although a hazardous material can migrate in the groundwater in a generally downgradient direction. There are, however, limits to this interpretation.

2.3 Reliance and General Limitations

This report has been prepared for the exclusive use of Greenfield Louisiana, LLC and subsidiaries of (collectively, the “relying parties”) and may not be relied upon by any other person or entity without Ramboll’s prior express written permission. The “relying parties” may rely on the report only if Ramboll’s client and the relying parties agree that Ramboll’s total exposure and liability in connection with this report to both Ramboll’s client and all other parties to whom reliance has been granted do not exceed the limitations of liability in the Terms and Conditions agreed to by Ramboll’s client in the contract for this assignment.

This report is considered current only for a period of 180 days from the site inspection. The conclusions presented in this report represent Ramboll’s best professional judgment based upon the information available and conditions existing as of the date of this report. In performing its assignment, Ramboll must rely upon publicly available information, information provided by the client, and information provided by third parties. Accordingly, the conclusions in this report are valid only to the extent that the information provided to Ramboll was accurate and complete. This review is not intended as legal advice, nor is it an exhaustive review of site conditions or facility compliance. Ramboll makes no representations or warranties, expressed or implied, about the conditions of the

site. Ramboll's scope of work for this assignment did not include collecting samples of any environmental media. As such, this review cannot rule out the existence of latent conditions including contamination not identified and defined by the data and information available for Ramboll's review; however, this report is intended, consistent with normal standards of practice and care, to assist the client in identifying the risks of such latent conditions.

Issues considered outside the scope of the ASTM Standard and this review include asbestos, radon, lead-based paint, lead in drinking water, wetlands, PCBs in building materials, cultural and historic resources, ecological resources, endangered species, fire safety, and high voltage power lines.

3. SITE DESCRIPTION

3.1 Site Setting

The entities (Donaldtec, Stephentec Rolandtec, Gayletec, Harry Robert Family llc, and A & T Robert Enterprises, llc) managed by Robert Brothers Farm, LLC own the property located on Highway 18 in Wallace, St. John the Baptist, Louisiana, (the "site" "property" or the "facility"). The approximately 1,582-acre site is located approximately 1.5 miles southeast of Gramercy (Figure 1). According to the Assessor's Office, the parcel number for the site is 0100019820.

The site is developed for agriculture purposes throughout the majority of the property with only storage and temporary structures on the site. Undeveloped areas are found on the southeastern portion of the site, near the southern boundary, on the portion of the site to the west of Highway 3213, and on the Mississippi River batture on the northern portion of the site. Located in the south central portion of the site small structures were observed in association with RHB Dirt Depot, LLC's clay borrow pit operations, these consist of a metal framed open shed for chemical and equipment storage, a trailer office, a roll-off container for additional storage of miscellaneous items, and a truck scale (see section 3.2). Additionally, a natural gas pipeline transects the site from northwest to south; however, facility personnel indicated the pipeline is no longer active, and the servitude is owned by Monterey Pipeline Company, additional signage and markers for Cypress Pipeline were observed onsite along the known servitude.

The majority of the site is leased to Hymel Brothers for agricultural purposes, and an approximately 2-acre leasehold with Sorrento Lumber is located on the northwestern portion of the site for a concrete mixing operation. Ramboll did not have access to the concrete mixing facility at the time of the site reconnaissance, therefore a complete onsite review of this property was not included in Ramboll's scope of this assessment.

There are three access roads from Highway 18 on the northern site boundary, two unnamed and one named Whitney Plantation Road, and two unnamed access roads from Highway 3213 on the western site boundary. The site is planted with sugar cane or naturally covered with other vegetation, and a heavily wooded area is located on the eastern portion of the site. A rail line for the Union Pacific Railroad transects the southern point of the site. The site has agriculture ditches throughout the property that routinely hold water. Additionally, there are some areas associated with undeveloped land and wetlands that were observed to hold water.

Table 1 provides an overview of physical setting and utility information for the site.

Table 1: Physical Setting and Utility Information		
Conditions	Source	Description
Topography		
Elevation (above mean sea level)	USGS topographic map; Google Earth	Ranges from approximately 30 feet on the levee and 17 feet near the northern property boundary to 4 feet near the southeast property boundary.

Table 1: Physical Setting and Utility Information		
Conditions	Source	Description
Topographic Gradient	USGS topographic map; visual observations	Relatively flat on-site, with a downward slope to the southeast. Regional topography slopes gently downward to the south toward Lac des Allemands, which eventually leads to the Gulf of Mexico.
Local Land Use	Visual observations	<p>The facility is located in a mixed residential/agriculture land use area.</p> <p><u>North</u>: Highway 18, Whitney Plantation, residential houses, St. John the Baptist water tower, and the Mississippi River. Agricultural land is found on a portion of the batture area between Highway 18 and the Mississippi River.</p> <p><u>East</u>: Agricultural land, the Evergreen Plantation, and undeveloped property.</p> <p><u>South</u>: Agricultural land and undeveloped property, beyond which is Highway 3127.</p> <p><u>West</u>: Highway 3213, residential houses, and agriculture land.</p> <p>A small parcel removed from the northwestern portion of the site is the Wallace wastewater, sewer plant, and electrical station. Additionally, a small portion of agriculture land (off-site) along Whitney Plantation Road that leads to the site was found to have three above-ground storage tanks (ASTs). Two plastic tanks were found with one labeled as Nutrien AgSolution and one was a rusted ammonia tank on a trailer. There was no evidence of staining, leaks, or stressed vegetation in association with the ASTs. Ramboll did not observe any conditions on adjacent properties that represent a potential contamination concern to the subject site.</p>
Nearest Residence	Visual observations	Adjoining on the northwestern portion of the site.
Hydrology		
Storm Water Runoff	Visual observations	Storm water at the site infiltrates into agriculture fields or enters agriculture ditches, raiaside drainage, and roadside drainage, which continue into natural drainage systems and does not go into the municipal storm sewer system.
Nearest Surface Water Body to the Site	USGS topographic map; Visual observations	The Mississippi River is nearest, located adjoining to the north of site at its nearest point. The Mississippi River ultimately discharges to the Gulf of Mexico. Onsite waters however flow southeast, and the nearest surface water body in a downgradient direction is Becnel Bayou, which ultimately flows into Lac des Allemands.
Flood Plain	FEMA*	Facility personnel reported no known occurrences of flooding at the site. A portion of the site is located within a 100-year flood zone.
Wetlands	NWI*; Visual observations	There is freshwater forested wetland on the southern and north central portions of the site. Ramboll is conducting a separate wetland evaluation, as suspect wetlands were identified at the site.

Table 1: Physical Setting and Utility Information		
Conditions	Source	Description
Geology and Hydrogeology		
Presumed Direction of Shallow Groundwater Flow	USGS topographic map	Based on the topographic gradient and the levee system, shallow groundwater likely flows to the southeast.
Depth to Groundwater	Not readily available	Information not readily available.
On-site Wells	Facility personnel; Database report; LDNR SONRIS	The database report plots a state water well on the property near the curve of Whitney Plantation Road. Based on the LDNR SONRIS registered water well information, this well was used in 1960 and has been plugged and abandoned. Additionally, the registered water well search indicated that a water well was installed in 2018 and is currently in use at the Sorrento Lumber Company leasehold on the property. Ramboll also observed an assumed water well and tap in the south-central portion of the site. Facility personnel confirmed that there was a water well onsite in this area used by the farmers leasing the site. The well is believed to be unregistered based on available information.
Nearest Groundwater Supply Wells	Database report	Approximately forty-four federally registered wells are present between one-quarter mile and one mile north, west, and east of the site; none are registered as public supply wells. Approximately two hundred and sixty-six private or municipal wells that may be used for water supply are located between one-quarter mile and one mile distance and north, west, and east of the site; one well at Marathon Petroleum is registered as a public water supply system (PWS). This location was noted as having or had a major violation/enforcement, but no further details were provided. Additionally, as the location is across the Mississippi River, this violation will likely not impact the site.
Geologic Conditions	NRCS	Regional soils are somewhat poorly drained to poorly drained silty-clay loams, silt loams, sandy loams, and clay with moderate to very slow infiltration rates.
Site Utility Information		
Heating and Cooling Equipment	Facility personnel	No current permanent structures are present at the site and there is no heating or cooling equipment present.
Natural Gas Service	Facility personnel	N/A; natural gas service is not provided to the site.
Use of Fuel Oil for Building Heat	Facility personnel	No known current or former use of fuel oil for building heat.

Table 1: Physical Setting and Utility Information		
Conditions	Source	Description
Foam-based Fire Suppression System	Facility personnel	According to facility personnel, the site is not equipped with a built-in foam-based fire suppression system.
Water Supply	Facility personnel	N/A; there is no municipal water supply provided to the site.
Sanitary Sewer	Facility personnel	The site is not served by the municipal sewer system.
Septic Systems	Facility personnel	Facility personnel indicated no current or former septic systems were present onsite.
<p>Notes:</p> <p>FEMA = Federal Emergency Management Agency; NRCS = Natural Resources Conservation Service; NWI = National Wetlands Inventory</p> <p>* - Source was provided in the environmental database report.</p> <p>During the site visit, Ramboll walked or drove by the borders of the properties that are adjacent to the subject site. Ramboll did not enter the neighboring properties.</p>		

3.2 Current Use of Property

3.2.1 Current Operations

The site is currently leased by Robert Brothers for for agricultural use and industrial purposes. The agricultural uses included sugar cane planting and harvesting. Industrial operations included a concrete mixing and hauling facility and a clay/fill soil excavation and hauling facility (currently not in operation). Maintenance-related materials and farming chemicals used at the site include fuels, oils, pesticides, greases, and non-chlorinated degreasers. Facility personnel knew of no use of chlorinated solvents by the site or its tenants. According to facility personnel, Robert Brothers' operations have remained generally consistent during its period of occupancy at the facility since 2006. The site and Robert Bros. do not employ any personnel.

Sorrento Lumber operates the 2-acre concrete mixing facility on the northern portion of the property adjacent to Highway 18. The facility includes aggregate storage for concrete mixing and limited chemical storage. Access to this facility and site personnel was not available to Ramboll. No findings were noted in association with this facility.

RHB Dirt Depot, LLC was onsite according to site personnel for approximately 5 years and operated a clay/fill borrow pit. According to site personnel the operators attempted to sell a large contract for materials but were unsuccessful and minimal operation and material removal took place onsite. RHB Dirt Depot personnel have been inactive at the site but associated equipment and materials including diesel and chemical storage, trailers, containers, truck scale and temporary building materials have remained onsite. According to site personnel, no formal leasing agreement exist between the landowners and RHB Dirt Depot, LLC.

3.2.2 Waste Management

Hazardous wastes and universal wastes (e.g., fluorescent light bulbs, batteries) are not routinely generated at the site.

Nonhazardous waste generated at the site consists of general trash and farming wastes. No dumpsters are present at the site as the site is used for agricultural purposes. Potential solid waste discarded at the site is further discussed in Section 5.2.6.

3.2.3 Wastewater and Storm Water

The facility does not generate process wastewater, and no sanitary wastewater is discharged at the site.

Storm water at the site infiltrates into agriculture fields or enters agriculture ditches, railside drainage, and roadside drainage, which continue into natural drainage systems and does not go into the municipal storm sewer system.

3.2.4 Air Emissions

Air emissions from the facility are limited to the use of machinery or farming equipment during certain times of the year.

4. REVIEW OF PUBLIC RECORDS AND OTHER INFORMATION SOURCES

4.1 Environmental Regulatory Database Review

Ramboll contracted with EDR in June 2020 to prepare of summary of listings in federal and state agency databases for the site and facilities within applicable radii of the property, as specified by the ASTM standard.¹ A copy of the environmental database search report is presented in Appendix B.

4.1.1 Database Review for Site

Ramboll reviewed the results of the state and federal environmental database searches performed by the third-party database provider (see Appendix B) and also searched the LDEQ Environmental Document Management System (EDMS) and EPA's EnviroFacts and the Environmental Compliance and Enforcement History Online (ECHO) databases. The site was not listed on any of the databases for which the ASTM Standard specifies that a review of pertinent files or regulatory records be conducted. The site is, however, listed on the following other databases related to regulatory compliance: the Facility Index System/Facility Registration System (FINDS) database, the ECHO database, and EDMS and EnviroFacts related to coverage under the National Pollutant Discharge Elimination System (NPDES). Robert Bros. permitted RHB Dirt Depot, LLC to operate onsite for clay pit operations and maintained coverage for mining operations; no enforcement actions related to the NPDES permit or other environmental programs are noted by EPA or LDEQ. Listings on these databases, by themselves, are not necessarily indicative of contamination.

Additionally, the site is georeferenced to four Emergency Release Notification System (ERNS) listings. However, upon review of these listings, two listings took place on the Mississippi River adjacent to the site but were located in federal waters and involved the release of natural gas from a pipeline crossing the river. Given the gaseous nature of the release and the written indication that the release took place in the Mississippi River, Ramboll does not consider these listings to represent a contamination concern to the subject site. Additionally, two ERNS listings are related to two separate incidents in Bay St. Elaine and Terrebonne Bay located in Terrebonne Parish, several miles south of the subject site. As such, these items are determined to be mis-plotted and are not considered to represent a concern to the subject site.

4.1.2 Database Review for Adjoining Properties

According to the environmental database search report, no adjoining sites are listed on databases that are indicative of a potential contamination concern.

4.1.3 Database Review for Other Surrounding Properties

There are no listings in the environmental database report for non-adjoining off-site facilities within applicable ASTM search radii.

The database report indicates that poor or inadequate address information was available for several sites located in the vicinity of the subject site; therefore, these sites could not be readily mapped by the third-party provider. Because the location of these sites with respect to the subject site could not be evaluated, Ramboll is limited in its ability to express an opinion regarding the potential for impact

¹ EDR uses the term "radii" to refer to the ASTM terminology "approximate minimum search distance" in the environmental database report.

to the subject site from these sites. It was beyond the scope of this review to accurately locate each of the unmapped sites identified by the third-party provider; however, Ramboll reviewed the list of unmapped sites and verified that one appears to be on the subject site, while the remaining orphan addresses and company listings do not appear to be adjacent to the subject site. The site is listed with a compliance history indicating that the site previously maintained coverage under a NPDES permit under the name Robert Brother Farms; this is consistent with the compliance listings in FINDS and ECHO discussed above. The permit (LAG490078) is listed as terminated status with an expiration date of April 30, 2020.

4.2 Historical Uses of the Site and Adjacent Sites

4.2.1 Past Uses of the Site

The site was farmland with a portion of undeveloped woodlands as early as the late 1800s. Robert Brothers Farm, LLC has managed the multiple entity owned site since November 2006, when they purchased the property from Formosa Chemicals, and has leased the majority of the site to Hymel Brothers since 2006 and a small portion of the site to Sorrento Lumber since January 2018.

A summary of Ramboll’s key observations from the available historical sources is presented in Table 2.

Table 2: Summary of Key Observations from Historical Sources for the Subject Site	
Historical Source	Key Observations Regarding Site History
Aerial Photographs (1952, 1961, 1975, 1982, 1998, 2005, 2009, 2013, and 2017) Satellite Imagery ¹ (1998 to 2019)	The site appears developed as agricultural land on the 1952 aerial photograph. This photograph and subsequent photographs until 1975 depict the agriculture land, Whitney Plantation Road transecting the site and other agricultural roadways. Additionally, residences are shown on the northwestern portion of the site, and one building is shown along the curve of the Whitney Plantation Road on the eastern portion of the site, which clearly appears onsite until 1982. The 1975 photograph shows the addition of more residences in the northern portion of the site and subsequent photographs show the site in its present configuration. The 1998 aerial photograph depicts the Veterans Memorial Bridge and off-ramp, which transects the western portion of the site disconnecting an area from the larger site. The 2012 satellite image depicts the clay borrow pit on the south-central portion of the site, and subsequent images depict the area filled with water at various times. No concerns are noted.
Topographic Maps (1892 to 2012)	No development other than area agricultural, residences and the offsite Whitney plantation property is depicted on the maps until 1998, with the Veterans Memorial Bridge offsite. No concerns are noted.
<p>Notes:</p> <p>¹ In addition to aerial photographs provided by the third-party provider, Ramboll viewed historical satellite imagery provided via Google Earth. Printed copies were not obtained, and imagery dates were not independently verified.</p> <p>The third-party provider reported that Sanborn fire insurance map coverage and city directory coverage are not available for the site.</p>	

4.2.2 Past Uses of Adjacent Sites

The properties in the vicinity of the site have primarily been used for undeveloped batture (north), agricultural purposes (north, south, east, and west), and residential purposes (north, east, and west) since as early as the 1800s. Ramboll did not observe obvious indications of concern on the historical sources reviewed.

4.3 Review of Local and State Agency Information

Ramboll visited or otherwise contacted local governmental agencies and regulatory bodies for information relating to the site. An overview of the findings of this review is presented in Table 3.

Table 3: Local Agency Information for the Site	
Agency Contacted / Document Reviewed	Information Obtained
St. John the Baptist Assessor	Information from the online St. John the Baptist records included an assessment listing and a tax map. The PRC indicates that ownership of the approximate 1,582-acre site is owned by Donaldtech, LLC & et al (see Section 1.1) with the parcel number 0100019820. No information was provided regarding construction of any onsite buildings.
St. John Fire Department	Ramboll contacted the St. John Fire Department on June 29, 2020. According to the response provided, there is no information of fire or environmental response actions at the site.
St. John Parish Health & Human	On June 29, 2020, Ramboll attempted to reach St. John Parish Health and Human Services; however, no response to our request was received.

4.4 Previous Environmental Assessments and Activities

Based on an interview with facility personnel, a prior environmental assessment activity has been conducted at the site, as summarized below. Pertinent historical and site-related information contained in the prior report have been incorporated into other sections of this report.

- **2019 Phase I Environmental Site Assessment.** A Phase I ESA was conducted on approximately 233 acres of the site by Elos Environmental, LLC in 2019 for Robert Brothers Farm, LLC. The 2019 Phase I report did not identify any concerns with respect to soil and groundwater conditions.

4.5 User-Provided Information

Ramboll provided Greenfield Louisiana, LLC with a User Questionnaire (consistent with Appendix X3 of the ASTM Standard) that requested information relating to environmental liens, activity use limitations (AULs), specialized knowledge of the property, property value diminution, chain-of-title, or any other commonly known or obvious indications of site contamination, that was not otherwise provided to Ramboll. The user did not provide any information that was not otherwise obtained and reviewed by Ramboll.

5. SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

Ramboll conducted a visit to the site on June 15, 2020 and June 16, 2020. During the site visit, observations of the site were made to evaluate if any RECs, as defined in Chapter 7, are present.

5.2 General Site Setting and Observations

Ramboll made observations concerning all issues specified in Sections 9.4.2 through 9.4.4 of the ASTM E1527-13 Standard. The presence or absence of each issue of environmental interest or concern is noted in Table 4. Additional information regarding observed and historical items is provided in the sections following the table.

Table 4: Summary of Site Reconnaissance Observations		
ASTM Section	Issue	Observation
Interior and Exterior Issues		
9.4.2.1	Current use(s) of the property	See Section 3.2
9.4.2.2	Past use(s) of the property	See Section 4.2
9.4.2.3	Hazardous substances and petroleum products used, treated, stored, disposed of, or generated on the property in connection with identified present or past uses	Present (see Section 5.2.1)
9.4.2.4	Storage tanks: Underground storage tanks (fill ports, vent pipes, manholes) Aboveground storage tanks	Absent Present (see Section 5.2.2)
9.4.2.5	Odors (strong, pungent or noxious)	Absent
9.4.2.6	Pools of liquid, standing surface water or sumps	Present (see Section 5.2.3)
9.4.2.7	Drums of hazardous substances or petroleum products (five-gallon, 55-gallon or totes)	Present (see Section 5.2.1)
9.4.2.8	Hazardous substance and petroleum product containers (not necessarily in connection with identified uses)	Present (see Section 5.2.1)
9.4.2.9	Unidentified substance containers suspected of containing hazardous substances or petroleum products	Present (see Section 5.2.1)
9.4.2.10	Polychlorinated biphenyls (PCBs) Electrical equipment on-site (e.g., transformers, capacitors) Electrical equipment known or likely to contain PCBs Hydraulic equipment on-site (e.g., elevators, truck dock lifts) Hydraulic equipment known or likely to contain PCBs	(see Section 5.2.4) Present Unlikely Unlikely Unlikely

Table 4: Summary of Site Reconnaissance Observations		
ASTM Section	Issue	Observation
Interior Issues		
9.4.3.1	Heating/cooling systems	Absent
9.4.3.2	Stains or corrosion on interior floors, walls or ceilings (except for staining from water)	Absent
9.4.3.3	Floor drains and interior sumps	Absent
Exterior Issues		
9.4.4.1	Pits, ponds or lagoons on property or adjacent sites	Present (see Section 5.2.5)
9.4.4.2	Stained soil or pavement	Absent
9.4.4.3	Stressed vegetation (from other than insufficient water)	Absent
9.4.4.4	On-site solid waste disposal; areas apparently filled or graded by non-natural causes; or mounds or depressions suggesting solid waste disposal	Present (see Section 5.2.6)
9.4.4.5	Wastewater or other liquid (including storm water) or any discharge into a drain, ditch, underground injection system or stream on or adjacent to the property	Present (see Section 3.2.3)
9.4.4.6	Wells (including dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	Present (see Table 1)
9.4.4.7	Septic systems or cesspools	Absent
<p>Notes:</p> <p>Observations noted in this table and discussed further below are based on information obtained during the site visit and from a review of the sources summarized in Section 4.</p> <p>See the ASTM Standard for a detailed description of the issues included in each referenced ASTM section.</p> <p>Per the ASTM Standard, fluorescent light ballasts likely to contain PCBs are not considered.</p> <p>N/A – Not applicable.</p>		

5.2.1 Hazardous Substances and Petroleum Products

Maintenance-related materials and farming chemicals used at the site include fuels, oils, pesticides, greases, and non-chlorinated degreasers.

Chemical storage at the site was generally found in the metal framed open shed on the south-central portion of the site. Chemicals found stored in this area consisted of engine oils and compressor lubricants (stored in totes and 55-gallon drums) and degreasers, hydraulic fluids, and greases (stored

in 5-gallon and 1-gallon containers). There is no designated collection for waste. Chemicals are stored on the ground in this exterior area with no secondary containment, and the 55-gallon drums were stored within the storage container onsite. No evidence of release was observed in the exterior area; however, minor staining was seen within the storage roll-off container. Facility personnel knew of no significant spills or releases of materials at drum and container storage areas.

5.2.2 Aboveground Storage Tanks

An aboveground storage tank (AST) is maintained at the site. Located on the south-central portion of the site containing approximately 250 gallons of Diesel fuel, the tank is situated on a trailer in the grass with a pump connected to the tank. No evidence of spills, releases, or stressed vegetation were observed. Facility personnel knew of no leaks or spills relating to the tanks, and Ramboll did not observe evidence of staining or past releases at the time of the site visit. Facility personnel indicated that there are no current or former underground transfer lines used to convey the materials from the tanks.

5.2.3 Pools of Liquid, Standing Surface Water, or Sumps

Standing surface water was found in multiple agricultural ditches and drainage pathways in undeveloped areas of the site. These drainage features are not used for wastewater or any operations at the site.

5.2.4 Polychlorinated Biphenyls (PCBs)

Facility personnel knew of no on-site equipment that is known to contain polychlorinated biphenyls (PCBs). Four pole-mounted transformers and two electrical boxes with unknown components that are possibly transformers are present on the property and six pole-mounted transformers are present on property boundaries. All are owned by Entergy, which has an agreement with Robert Brothers Farm to use their servitude along Highway 18 for pole-mounted transformers. The units are not labeled as to their PCB content.

Because the installation date of the units is unknown and may predate the 1979 federal ban on the manufacture of PCBs, it is possible that the transformer oils contain PCBs.

Ramboll observed no indication of leaks or releases from electrical equipment during the site visit.

5.2.5 Pits, Ponds, and Lagoons

Other than drainage swales, which are located in undeveloped wetland areas and throughout the agriculture land for drainage purposes, there is an approximately 2-acre water body present in the south-central portion of the site. Based on historical documents, it appears this area was used as a man-made borrow pit for RHB Dirt Depot, LLC operations at the site in 2012 and has filled with water various times since 2012. As operations stopped at the site, the area was able to subsequently hold water creating an onsite surface water body.

5.2.6 Solid Waste Disposal Areas or Areas Filled by Non-Natural Causes

Ramboll observed onsite waste consisting of old farming equipment, such as tractors, tires, plastic drums and 5-gallon containers, scrap metal, concrete pipes, and wood debris throughout various areas of the site. There was no evidence of staining or stressed vegetation surrounding these waste items and areas during the site investigation.

6. FINDINGS, OPINION, AND CONCLUSIONS

Ramboll performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of the Robert Brothers Far, LLC located on Highway 18 in Wallace, Louisiana in June 2020. The objective of the ESA was to identify RECs, as defined in the ASTM Standard. A list of key definitions presented in the ASTM Standard is provided in Chapter 7 at the end of this report. Any exceptions to, or deletions from, this practice are described in Section 6.2.

6.1 Findings, Opinions, and Conclusions

6.1.1 Recognized Environmental Conditions

Ramboll has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-13 of the Robert Bros site located on Highway 18. Any exceptions to, or deletions from, this practice are described in Section 6.2 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property.

6.1.2 Other Findings

The following findings related to potential contamination concerns were identified:

- Past Use of Site for Residential Purposes and Agricultural Lands.** The site was previously used for agricultural purposes including sugar cane farming from at least the 1950s to the present day and historical documentation indicates dating as early as the late 1800s. During this time period, a few scattered residences and associated outbuildings were present on the northern portions of the site and other buildings were noted on the northeastern portion of the site. The residences and buildings may have used aboveground or underground fuel oil tanks for heating purposes and for farm vehicle fueling. Also, farming operations may have involved the application of arsenic and lead-based pesticides commonly used in the first half of the 20th century, or other organic pesticides commonly used thereafter. Facility personnel reported no knowledge of past use of any pesticides. Although this matter is not considered a REC, the potential presence of these compounds at the site cannot be ruled out. Ramboll notes that this matter is unlikely to result in regulatory scrutiny, assuming no changes to site use. Ramboll further notes that the use of such substances in this region (which is and has been historically widely used for sugarcane and soybean production) would have been fairly widespread and ubiquitous.
- Site Railroad Operations.** A railroad line transects the southern portion of the site. The railroad line is still active in present day and historical topographic resources indicate it to be present since before 1892. Train cars are known to carry various items, such as chemicals and hazardous substances; therefore, it is possible that small amounts of such substances traversed this spur and may have leaked from the railcars over time. However, during Ramboll's site investigation, no evidence of a past release was observed; therefore, this is not considered a REC.

6.1.3 De Minimis Conditions

De minimis conditions are those that do not represent a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate governmental agencies. Ramboll identified the following *de minimis* conditions related to the site:

- Onsite Waste Disposal.** Ramboll identified waste such as used tires, tractors, plastic and empty 5-gallon containers, scrap metal, concrete pipes, and wood debris in various locations around the

site. Because these observations were not that of a chemical nature and Ramboll's review did not identify documentation of a release, a suspected release, or a potentially material threat of a hazardous substance release related to this matter and there was no evidence of staining or stressed vegetation in association with these waste disposal areas, Ramboll considers this matter to represent a *de minimis* condition. However, such conditions may be in violation of the State of Louisiana Solid Waste Management Regulations per 33 LAC III.315 Section 10509.

- **Unregistered Water Well.** Ramboll identified an active water well during the site investigation. The well, per records available, was determined to not be registered with the proper state and federal agencies. Additionally, the installation date and use are unknown. Site personnel indicated this was used by the farmer leasing the site. Distressed vegetation and ferrous discolored surface soils surrounding the well were observed. This observation is likely due to repeated inundation with water of a high iron content at the surface. There is no evidence of a release of chemical, petroleum or hazardous substances in the area; therefore, this matter is considered *de minimis*.
- **Pavement and Floor Staining.** Ramboll observed one area of minor staining associated with two 55-gallon motor oil drums in the roll-off container onsite. The stains were limited in areal extent, and no stains appeared to the soil outside of the container. As such, Ramboll considers this matter to represent a *de minimis* condition.

6.2 Analysis of Data Gaps

The ASTM Standard defines a data gap as "a lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information." A data gap is only significant if other information obtained during the ESA, or professional experience, raises reasonable concerns and affects the ability of the environmental professional to identify whether a given issue is a REC. The ASTM Standard requires that the ESA report identify and comment on significant data gaps.

Limiting conditions and deviations to the ASTM Standard for the assessment are discussed below.

- Due to extended age of the site, it was not possible to interview representatives dating back to the site's first developed agriculture use. However, Ramboll conducted interviews with representatives of Robert Brothers Farm with tenure at the site dating back to 2006 and reviewed other historical sources regarding former uses of the property.
- During the site visit, every effort was made to inspect as much of the site as possible; however, the entirety of the site could not be readily inspected due to heavy overgrowth (brush and thickly wooded areas).
- Historical information, such as aerial photographs, was not readily available to characterize the property from the present back to the property's obvious first developed use. The earliest readily available historical source that would indicate specific site uses is an aerial photograph dated 1952 and topographic maps dated 1892 which shows that at least a portion of the property was already developed for agricultural uses. ASTM defines agricultural site use as a "developed" site use.
- As it is a user requirement, Ramboll did not conduct a review of records to identify whether any environmental liens or activity and use limitations (AULs) have been imposed on the site.

None of the exceptions, deletions, deviations, or site reconnaissance limitations noted above are considered to represent significant data gaps.

7. ASTM DEFINITIONS

The following definitions are presented in the ASTM Standard:

REC - Recognized Environmental Condition:

The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment.

CREC - Controlled Recognized Environmental Condition:

A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

HREC - Historical Recognized Environmental Condition:

A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed 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.

***De minimis* Condition:**

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.

Data Gap / Significant Data Gap:

A lack of or inability to obtain information required by the practice despite good faith efforts by the environmental professional to gather such information. A data gap is significant if other information and/or professional experience raises concerns involving the data gap.

Please note that the term "other finding" is not defined by ASTM; rather, Ramboll uses the term to connote areas of contingent risk that are not clearly defined by the ASTM Standard.

FIGURES

**APPENDIX A
SITE PHOTOGRAPHS**

APPENDIX B ENVIRONMENTAL DATABASE REPORT

NOTES ON ENVIRONMENTAL DATABASE REPORT

The third-party provider conducted its searches for the standard environmental record sources and the minimum search distances, as specified by the ASTM Standard. The ASTM Standard uses the terminology “approximate minimum search distance” to refer to the radii searched in the environmental database report.

The third-party provider conducted the search of environmental databases in June 2020. Because the environmental databases themselves are sometimes not updated by the specific regulatory agencies for periods of up to one year or more (depending on the database and the state), the database search conducted herein will not necessarily list any facility or site for which an environmental investigation/listing has been initiated subsequent to the last update.

**APPENDIX C
HISTORICAL RESEARCH DOCUMENTATION**

**APPENDIX C.1
TOPOGRAPHIC MAPS**

**APPENDIX C.2
AERIAL PHOTOGRAPHS**

**APPENDIX C.3
WELL SEARCH REPORT**

**APPENDIX D
PREVIOUS ENVIRONMENTAL REPORTS**

**APPENDIX E
QUALIFICATIONS OF ENVIRONMENTAL
PROFESSIONALS**