

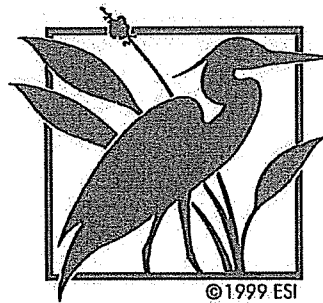
**PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

**30-ACRE OAKLEAF DONATION SITE
CLAY COUNTY, FLORIDA**

**ESI Project SG08013.00
15 May 2008**

FOR

Clay County School District
900 Walnut Street
Green Cove Springs, Florida 32043



BY

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ACRONYMS

ACM	Asbestos-Containing Material
AAI	All Appropriate Inquiries
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
ATRP	Abandoned Tank Restoration Program
AUL	Activity Use Limitation
CAR	Contamination Assessment Report
CDS	Compliance Data System
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CORRACTS	Corrective Action Sites (RCRA)
DEP	Department of Environmental Protection
DER	Department of Environmental Regulation
DOC	Docket System
EDI	Early Detection Incentive Program
EP	Environmental Professional
EPA	Environmental Protection Agency
ERNS	Emergency Response Notification System
ESA	Environmental Site Assessment
FAC	Florida Administrative Code
FATES	FIFRA and TSCA Enforcement System
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
FINDS	Facility Index System
FTTS	FIFRA and TSCA Tracking System
GMS	Groundwater Management System
HWDMs	Hazardous Waste Data Management System
LLP	Landowner Liability Protection
LRST	Leaking Registered Storage Tank
LUST	Leaking Underground Storage Tank
NAEP	National Association of Environmental Professionals
NFRAP	No Further Remedial Action Planned
NGVD	National Geodetic Vertical Datum
NPDES	National Pollution Discharge Elimination System
NPL	National Priority List
NREP	National Registry of Environmental Professionals
OSHA	Occupational Safety and Health Administration
PADS	PCB Activity Database System
PCB	Polychlorinated Biphenyl
PCP	Pre-approval Clean Up Program
PCPP	Petroleum Cleanup Participation Program
PCS	Permit Compliance System
PLIRP	Petroleum Liability and Insurance Restoration Program
RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Information System
REC	Recognized Environmental Condition
SARA	Superfund Amendment and Reauthorization Act
RST	Registered Storage Tank
SARA	Superfund Amendment and Reauthorization Act
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
TSD	Treatment, Storage and/or Disposal
USDA	United States Department of Agriculture
UST	Underground Storage Tank
WQD	Water Quality Division

1.0 SUMMARY

Environmental Services, Inc., (ESI) has completed a Phase I Environmental Site Assessment (ESA) in conformance with the scope and limitations of American Society for Testing and Materials (ASTM) Practice E1527-05 to identify recognized environmental conditions (RECs) that may be associated with approximately 30 acres of land located south of Oakleaf Plantation Parkway in Clay County, Florida, herein referred to as the *property*.

The *property* comprises a 30-acre parcel of undeveloped, wooded land, with an overgrown trail road crossing through a central portion of the site. No buildings, structures, or evidence of specific land uses were identified on any portion of the *property*. Historical research identified previous uses of the *property* that included timbering on the eastern portions of the site.

Adjoining properties include wooded land to the east; cleared and graded land with paved roads for an intended residential development to the southeast; wooded land to the south; wooded land to the west with a golf course and residential community beyond; and Oakleaf Plantation Parkway to the north with a residential development beyond. Historical research identified previous uses of adjoining properties that included only timbering.

Review of available federal and state regulatory agency database information did not identify any site/facility listings within minimum ASTM search distance from the *property*.

A review of current and past uses of the *property* and adjoining/nearby properties; a review of environmental regulatory agency database and file records; the results of the site and vicinity reconnaissance; and the results of *property* owner and other interviews did not identify any recognized environmental conditions in connection with the *property*. Therefore, it is ESI's opinion that further assessment of the *property* is not warranted at this time.

2.0 INTRODUCTION

2.1 Purpose

ESI completed this Phase I ESA to identify recognized environmental conditions that may be associated with past or present uses of the *property* or adjoining/nearby properties. The findings, opinions and conclusions expressed in this report have been made to assist the client and any other authorized report users in making a reasonable evaluation for a proposed business transaction with respect to possible environmental contamination concerns in connection with the *property*, and to conduct an all appropriate inquiry in conformance with EPA's "Standards and Practices for All Appropriate Inquiries", 40 CFR Part 312. This Phase I ESA was authorized by Mr. Phil Hans with the Clay County School District, and completed for the Clay County School District.

2.2 Scope of Services

Phase I ESA tasks included (1) review of physical setting sources, historical aerial photographs and other historical record documents, and regulatory agency records; (2)

site and vicinity reconnaissance for recognized environmental conditions; (3) interviews with the current *property* owner representative, the on-site *property* manager, and several occupants of the *property* that may be familiar with the site, as well as local regulatory agency personnel; and (4) preparation of this report to document and assess any potential recognized environmental conditions.

2.3 Limitations, Definitions and Deviations

Performance of ASTM Practice E1527-05 is intended to reduce, but not eliminate, uncertainty regarding the potential for *recognized environmental conditions* in connection with a *property*. Appropriate inquiry for this practice does not mean an exhaustive assessment, and results in a balance between the cost to obtain information and the time required to gather it. This Phase I ESA was conducted in conformance with the scope and limitations of ASTM Practice E1527-05, which meets the requirements for all appropriate inquiries as outlined by EPA in "Standards and Practices for All Appropriate Inquiries", 40 CFR Part 312.

This environmental site assessment was performed by an *environmental professional* or conducted under the supervision or responsible charge of the *environmental professional*. The interviews and site reconnaissance were performed by a person possessing sufficient training and experience necessary to conduct the site reconnaissance and interviews in accordance with the ASTM Practice, and having the ability to identify issues relevant to *recognized environmental conditions* in connection with the *property*. At a minimum, the *environmental professional* was involved in planning the site reconnaissance and interviews. Review and interpretation of information upon which the report is based were performed by the *environmental professional*.

An *environmental professional*, as defined by the ASTM Practice, possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases on, at, in, or to a *property*, sufficient to meet the objectives and performance factors in §312.20(e) and (f) of 40 CFR Part 312.

Recognized environmental conditions, defined by the ASTM Practice, include the presence or likely presence of *hazardous substances* or *petroleum products* on a *property* under conditions that indicate an existing release, a past release, or a material threat of a release of *hazardous substances* or *petroleum products* into structures on the *property* or into the ground, groundwater, or surface water of the *property*. The term includes *hazardous substances* or *petroleum products* even under conditions in compliance with current regulations. The term is not intended to include *de minimis* conditions that generally do not present a material risk of harm to public 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. Additionally, the term specifically does not include other business environmental risks, such as the presence of asbestos, indoor air quality, mold, radon, wetlands, cultural/historical resources, threatened/endangered species, or regulatory agency compliance issues. The results of this assessment are not

intended as a guarantee or warranty that no environmental conditions exist, or that contamination is absent from the *property*. Active testing of soil and groundwater is the only means available to substantiate such a statement. ESI accepts no responsibility for damages or claims due to past or future contamination, or subsequent remediation.

Professional opinions expressed in this report are based upon the information obtained during this Phase I ESA while exercising an appropriate level of inquiry. As with any due diligence evaluation, there is a certain degree of dependence upon interview information provided by facility or site representatives, regulatory agency personnel, and others, which may not be readily verifiable through field observations or supported by any available written documentation. ESI shall not be held responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed by facility or site representatives and other parties at the time this Phase I ESA was conducted. Also, ESI shall not be responsible for non-fulfillment of user obligations for this assessment, including, but not limited to, the reporting of knowledge of environmental liens encumbering the *property*, specialized knowledge or experience for the *property*, knowledge of a significantly lower purchase price for the *property* due to environmental impairment, or an Activity or Use Limitation (AUL) for the *property*. AULs, as defined by the ASTM Practice, include *engineering controls*, land use restrictions or *institutional controls* that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law. AULs are one indication of a past or present release of a *hazardous substance* or *petroleum products*. AULs are an explicit recognition by a federal, tribal, state, or local regulatory agency that residual levels of *hazardous substances* or *petroleum products* may be present on a *property*, and that unrestricted use of the *property* may not be acceptable.

In addition, environmental conditions may exist on the *property* that could not be identified through the scope of this Phase I ESA, or that could not be visually and/or physically observed during the site reconnaissance.

2.4 Significant Assumptions

ESI has assumed that information provided by others, and relied upon by ESI for preparation of this report was factually accurate, including information from interviews, and information obtained from a review of files and database records. ESI also assumed for this study, based on observed conditions and a review of USGS topographic data, that surficial groundwater flow direction for the site would most likely flow to the west. In addition, ESI assumed that historical aerial photographs, topographic maps, and other information was representative of conditions during periods between coverage.

2.5 User Reliance

This Phase I ESA report has been prepared for the exclusive use of Clay County School District and their duly authorized agents, with specific application to the *property*. Use of this report by any other third party is not authorized without the expressed written consent of ESI; ESI disclaims liability for any such unauthorized use or reliance.

3.0 **PROPERTY**

3.1 Description

The *property* comprises approximately 30 acres of undeveloped, wooded land, with an overgrown trail road crossing through the site located in Clay County, Florida, in Section 7, Township 4 South, and Range 25 East. A Site Location/Topographic Map is provided as **Figure 1** in **Appendix A**. A copy of a 2007 aerial photograph, annotated with the approximate *property* boundaries, is provided as **Figure 2** in **Appendix B**. The *property* comprises a 30-acre portion of Clay County PIN 07-04-25-007870-000-00, and the current owner of the site is listed as AFI Associates, Inc. The *property* is listed as timberland, with no building structures listed for the *property*. Copies of the online records are provided in **Appendix C**.

Based on review of a USGS topographic map (Jacksonville Heights Quadrangle, Florida, 1993) of the *property*, site elevation is relatively flat at an elevation of +70 feet NGVD.

3.2 Historical Review

Historical aerial photographs of the *property* were obtained from the Internet website for the University of Florida Publication of Archival, Library and Museum Materials (PALMM) for the years 1943 and 1953; from the Florida Department of Transportation (FDOT) for the years 1969, 1975, 1984, 1993, and 2004; and from Aerials Express for the year 2007. Conditions on the *property* between 1943 and 1984 consisted primarily of wooded land, with timbered eastern portions. Conditions on the *property* changed in 1993, when a cleared area with disturbed soil conditions was observed on a northern portion of the site, and was most likely caused by heavy traffic conditions during timbering activities of the *property* as evidenced by the presence of a trail road crossing through a central portion of the *property*. No trailers, buildings, or any other structures were observed at the cleared area. Conditions on the *property* changed again in 2007, when the suspected staging area was no longer observed on the *property* and wooded conditions were observed on eastern portions of the site.

A review of historical USGS topographic maps (Middleburg, Florida, 1918 and Jacksonville Heights, Florida, 1949, 1964, 1970, 1978, 1984, and 1993) of the *property* was completed to identify evidence of past or present uses. No building structures or other indications of specific land uses were depicted on the *property* on any of the various maps.

Sanborn Fire Insurance Maps for the *property* do not exist for the *property* according to a search for available Sanborn Maps by Environmental Data Resources (EDR), Inc.

Selected editions of the *Green Cove Springs/Orange Park City Directory* by R. L. Polk Publishers (1975, 1978, 1984, 1989, 1994, 1999, and 2004) were reviewed at the Main Clay County Library Branch in Orange Park, Florida. No listings were identified for the *property*.

4.0 ADJOINING/NEARBY PROPERTIES

4.1 Description

Adjoining properties include wooded land to the east; cleared and graded land with paved roads for an intended residential development to the southeast; wooded land to the south; wooded land to the west with a golf course and residential community beyond; and Oakleaf Plantation Parkway to the north with a residential development beyond.

4.2 Historical Review

The historical aerial photographs previously cited in Section 3.2 were also reviewed for the areas surrounding the *property*. Conditions on adjoining properties between 1943 and 1993 consisted of wooded land to partially wooded land. Conditions on the adjoining properties changed in 2007, when Oakleaf Plantation Parkway and a residential development were observed to the north, and cleared and graded land with paved roadways for an intended residential development was observed to the southeast.

A review of historical USGS topographic maps (See Section 3.2) of the *property* vicinity was also completed to identify evidence of past or present uses. No structures or buildings were observed on any of the adjoining properties.

Attempts were made to review Sanborn Fire Insurance Maps information for the *property*; but, these do not exist for the area in which the *property* is located according to according to a search for available Sanborn Fire Insurance Maps conducted by Environmental Data Resources, Inc.

City directories (See Section 3.2) were also reviewed to identify past uses of adjoining properties for potential environmental concerns. No listings were identified for any of the adjoining properties.

5.0 USER PROVIDED INFORMATION

A user questionnaire was completed by the Coordinator Planning and Intergovernmental Relations representative for the Clay County School District, Mr. Phil Hans, and is provided as **Appendix D**. According to his responses as documented in the questionnaire, Mr. Hans was not aware of any environmental cleanup liens against the *property* that are filed or recorded under federal, tribal, state or local law. He was not aware of any AULs, such as engineering controls or institutional controls that may be in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law; but was aware of land use restrictions on the site as it is currently designated as wetlands. He reported having specialized knowledge or experience related to the *property* or nearby properties for several decades, and is unaware of any known or suspected contamination concerns. According to Mr. Hans, there is no purchase price for the *property* as the site is being donated to the Clay County School District by AFI Associates, Inc.. He reported that he was not aware of commonly known or reasonably ascertainable information about the *property* that would help the *environmental professional* to

identify conditions indicative of releases or threatened releases. Based on his knowledge and experience related to the *property*, he indicated there are no obvious indicators that point to the presence or likely presence of contamination at the *property*.

No other user provided information, including deed records, previous reports, surveys, or assessment documents, was made available for this Phase I ESA. According to the client and user of this report, the assessment was completed for an intended sale of the *property*.

6.0 RECORDS REVIEW

6.1 Standard Environmental Record Sources

Current standard regulatory agency database records were reviewed during this Phase I ESA to determine whether the *property*, or any of the adjoining/nearby properties within specified search distances were known to have either present or past use, or contamination concerns associated with hazardous substances or petroleum products. EPA database information, including NPL, Delisted NPL, CERCLIS, CERCLIS/NFRAP, RCRA CORRACTS, RCRA non-CORRACTS TSD, institutional controls/engineering controls, ERNS, and RCRIS; state and tribal database information, including state and tribal-equivalent NPL, CERCLIS, SWF, LRST, RST, institutional controls/engineering controls, voluntary cleanup sites, Brownfields, and other non-ASTM designated records, were obtained from various Internet websites maintained separately by both the EPA and the State of Florida, which are provided in **Appendix E**. No site/facility listings were identified within minimum ASTM search distances from the *property*.

6.2 Additional Environmental Record Sources

ESI completed a previous Phase I ESA for an approximate 1,500 acre tract of land in August 2004, which included the current *property* boundary. According to the report, no recognized environmental conditions were identified for the current *property* boundary, although a former cattle dip vat was reportedly located approximately 2,000 feet to the northwest of the *property* boundary. The cattle dip vat was reportedly removed in 2003, and the site was issued a "No Further Action" status by the FDEP.

No other record sources were reviewed; ESI contacted personnel from the Florida Department of Environmental Protection – Hazardous Waste Division for information on local/nearby facilities known to them (see interviews in Section 8.0).

7.0 SITE RECONNAISSANCE

ESI personnel visited the *property* on 8 May 2008. Photographs of the *property* taken during the site visit are presented in **Appendix F**. No *property* owner or representative was available during the site visit. The reconnaissance included a pedestrian survey of the current existing conditions on the *property*, as well as a pedestrian and vehicular survey from the *property* boundaries and/or public rights-of ways of the surrounding vicinity for potential recognized

environmental conditions regarding hazardous substances and petroleum product uses. The *property* comprises undeveloped, wooded land with an overgrown trail road crossing through a central portion of the *property*. No buildings, structures, or other man-made features were identified on any portion of the *property*. No suspect or recognized environmental conditions were identified on the *property*.

The adjoining properties were also observed during the site reconnaissance. No suspicious containers, stained soils, odors or other conditions were identified on the readily observable portions of the adjoining that would suggest the presence of conditions representative of environmental concerns that could impact the *property*.

8.0 INTERVIEWS

The *property* owner representative, Mr. Erik Wilson with AFI Associates, Inc., was interviewed for this investigation (904-262-7718). Mr. Wilson stated AFI Associates, Inc. purchased the *property* in 1993, and that the site was undeveloped, wooded land at the time of their purchase. Mr. Wilson stated that the only previous uses of the *property* were for timbering activities on eastern portions of the site conducted by Callahan Timber, and was unaware of any buildings or other manmade structures on any portion of the *property*. When asked about the presence of any staging areas for timbering activities on the *property*, Mr. Wilson stated that he was unaware of any permanent staging areas on any portion of the site. When asked about past uses of the site for dumping of hazardous waste or petroleum products, Mr. Wilson stated that he was unaware of any such conditions on the *property*. When asked about the presence of any other environmental concerns on the *property*, Mr. Wilson stated that he was unaware of any other environmental concerns on the site.

Callahan Timber representative, Mr. Jim Coleman (904-591-5605), was interviewed for this investigation. Mr. Coleman indicated that Callahan Timber has managed silviculture operations for the eastern portions of the *property* and most of the timberland tracts within the Oakleaf Plantation area for several years. When asked about the use of herbicides on the *property*, Mr. Coleman stated that the compounds Garlan 4 and Chopper were applied every couple of months in accordance with best management practices to control unwanted plant species surrounding the planted pine trees. He also stated that the last time these compounds were applied to the site was over one year ago, and that the herbicides applied during the previous application event had already broken down chemically.

FDEP representative, Ms. Deneen Benefield with the Hazardous Waste Division (904-807-3300) was interviewed for information regarding nearby registered landfill facilities or hazardous waste cleanup sites. Ms. Benefield indicated that there were no registered facilities within one-quarter mile of the *property*.

9.0 DATA GAPS

No data gap, a lack of, or inability to obtain information, as required by the ASTM Practice, was encountered that, in the opinion of this assessment's *environmental professional(s)*, affected the ability of the *environmental professional(s)* to identify *recognized environmental conditions* during the completion of this Phase I ESA.

10.0 FINDINGS, OPINIONS AND CONCLUSIONS

A review of current and past uses of the *property* and adjoining/nearby properties; a review of environmental regulatory agency database and file records; the results of the site and vicinity reconnaissance; and the results of *property* owner and other interviews did not identify any recognized environmental conditions in connection with the *property*.

ESI has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E1527-05 for approximately 30 acres of undeveloped, wooded land located south of Oakleaf Plantation Parkway in Clay County, Florida, the *property*. Any exceptions to, or deletions from, this practice are described in Sections 2.2 or 2.3 of this report. Based on these findings, it is ESI's opinion that further assessment of the *property* is not warranted at this time.

11.0 REFERENCES

American Society for Testing and Materials, Environmental Site Assessments for Commercial Real Estate, E1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, Fourth Edition.

Environmental Protection Agency, Envirofacts Internet Homepage: <http://www.epa.gov/>

Florida Department of Environmental Protection Internet Homepage: <http://www.dep.state.fl.us/>

Clay County Property Assessors Internet website: <http://www.ccpao.com>

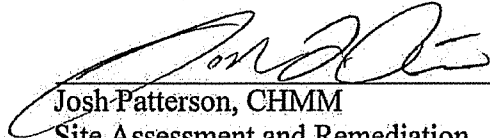
R.L. Polk & Company Publishers, *Green Cove Springs/Orange Park City Directory*. 1975, 1978, 1984, 1989, 1994, 1999, and 2004.

U.S. Geological Survey 7.5 Minute Topographic Map, Jacksonville Heights Quadrangle, Florida, 1949, 1964, 1970, 1984, and 1993.

U.S. Geological Survey 15 Minute Topographic Map, Middleburg Quadrangle, Florida, 1918.

12.0 ENVIRONMENTAL PROFESSIONAL

12.1 Signature

 3.15.08

Josh Patterson, CHMM
Site Assessment and Remediation
Vice President/Division Director

12.2 Declaration

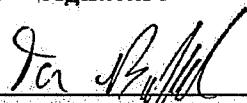
I, declare that, to the best of my professional knowledge and belief, I meet the definition of *environmental professional* as defined in §312.10 of 40 CFR 312. I have the specific qualifications based on education, training, and experience to assess a *property* of the nature, history, and setting of 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.

12.3 Qualification

The senior project manager for the site assessment was Mr. Joshua T. Patterson. Mr. Patterson is a Certified Hazardous Materials Manager (C.H.M.M. No. 012520) and Senior Project Manager with the Site Assessment and Remediation Division of Environmental Services, Inc. Mr. Patterson has a Master of Business Administration degree in Environmental Business Management (2001) and a Bachelor of Science degree in Biological Science (1999) from Florida Atlantic University. Mr. Patterson has over eight years experience in conducting environmental site assessments, site remediation, and all phases of field-testing and sampling activities. Mr. Patterson is OSHA-certified at the Site Supervisor Level for Hazardous Materials Operations and Emergency Response.

13.0 OTHER PERSONNEL

13.1 Signature



Don Barfield, LEED AP
Project Scientist II

13.2 Declaration

I declare that this *environmental site assessment* was conducted under the supervision or responsible charge of the *environmental professional(s)*. I possess sufficient training and the experience that was necessary to conduct the *site reconnaissance* and *interviews* in