



PHASE I ENVIRONMENTAL SITE ASSESSMENT

137 N. Mill Street
St. Louis, Michigan 48801

Project No. 24-3722

May 9, 2024

PREPARED FOR:

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1.0 EXECUTIVE SUMMARY

Triterra conducted a Phase I Environmental Site Assessment (ESA) on behalf of Gratiot County Land Bank Authority for the parcel of land located at 137 N. Mill Street in St. Louis (City of St. Louis), Gratiot County, Michigan (the subject property). The Phase I ESA was completed to evaluate for recognized environmental conditions (RECs) in connection with the subject property.

The Phase I ESA was conducted in conformance with the requirements of American Society for Testing and Materials Designation: E 1527-21 Phase I Environmental Site Assessment Process (ASTM E 1527-21). The Phase I ESA included review of standard federal, state, and tribal environmental records; review of standard historical records; property reconnaissance; interviews to investigate past and current land uses at the subject property; and vapor encroachment condition (VEC) screening.

Based on Triterra's review of historical information, the subject property was developed with at least three commercial buildings by at least 1884. Occupants of the subject property between at least 1884 and 1893 included one or more of the following: a tailor, hotel and hotel laundry operations (The Harrington), bank, cobbler, barber, saloon and billiards, jewelry store, drugstore, grocery and feed store, and a wood house and/or wool house. By at least 1899, two of the previous commercial buildings were razed, and an addition was made to the remaining building (forming the currently existing building), which continued to be occupied by The Harrington on the upper floors and commercial storefronts. The Harrington hotel operations cease on the subject property by at least 1910, and portions of the subject property building were occupied by various commercial office and retail operations until at least 1965. By at least 1924, the printing operations occupied the western portion of the subject property until at least 1948. The subject property building was reportedly vacant by at least 1975. Between at least 1980 and 1995, the subject property is occupied by residential apartments and/or the Masonic Temple. The subject property building has been vacant since at least 2000.

The Phase I ESA has revealed the following RECs in connection with the subject property:

- **The potential for contamination on the subject property from historical laundry and printing operations (Section 5.1).** According to Triterra's review of available historical information, historical laundry operations occurred on the subject property between at least 1888 and 1893. The scope of laundry operations (ie, potential dry cleaning, chemical cleaning agents potentially used, historical waste disposal practices, etc) is unknown to Triterra. Therefore, the potential exists for hazardous substances and/or petroleum products used in association with historical laundry operations to have impacted the subsurface of the subject property. Additionally, historical printing operations occurred on the subject property between at least 1924 and 1948. Historical printing operations are known for the use of paints, inks and/or other hazardous substances, which may have been released and impacted the subsurface of the subject property.
- **The potential for an abandoned Underground Storage Tank (UST) on the subject property (Section 5.1).** A gasoline UST was documented in the southwestern corner of the subject property on Sanborn maps in 1884. Triterra encountered no records regarding UST installation and removal dates, UST construction, capacity, etc. Therefore, the potential exists for the UST to have been abandoned-in-place on the subject property, and unknown and/or undocumented releases may



have occurred and impacted the subsurface of the subject property. Thus, the potential for an abandoned UST on the subject property represents a REC in connection with the subject property.

- **The potential for migration of contamination onto the subject property from the nearby sites of concern (Sections 4.2 and 5.3).**
 - 215 W. Saginaw Street adjoins the subject property to the west. According to Triterra's review of historical information, printing operations occurred onsite between at least 1884 and 1893. Historical printing operations are known for the use of paints, inks and/or other hazardous substances, which may have been released and impacted the subsurface. Based on proximity to the subject property, the potential exists for contamination to have migrated onto the subject property.
 - 220 W. Washington Avenue is located approximately 159 feet southwest of the subject property. According to the results of subsurface investigations conducted onsite between 2018 and 2019 by Mannik Smith Group and/or AKT Peerless Environmental Services to assess historical gas station, auto repair, and oil warehouse operations, various volatile organic compounds (VOCs), lead, and chromium were detected in shallow groundwater in exceedance of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) Part 201 Residential Generic Cleanup Criteria (GCC) within 250 feet of the subject property. The plume of contamination is currently undefined. Additionally, area groundwater flow models indicate that groundwater flows north-northeast, toward the subject property. Potential exists for contamination to have migrated onto the subject property.
 - During Triterra's review of historical uses of adjoining sites, Triterra identified a historical gasoline UST located in the N. Mill Street right-of-way, approximately 60 to 70 feet southeast of the subject property (adjacent to 126 N. Mill Street) in Sanborn maps from at least 1924 to 1948. The UST contents, capacity, construction, installation and/or removal date(s) are unknown to Triterra. Unknown and/or undocumented releases may have occurred and impacted the subsurface. Based on proximity to the subject property (less than 100 feet), the potential exists for contamination to have migrated onto the subject property. Therefore, in Triterra's opinion, the gasoline UST in the right-of-way of N. Mill Street represents a REC in connection with the subject property.

If contamination is present from sources outside of the subject property, this condition could be defended through an exemption under Part 201 of Public Act 451, as amended. The contaminant migration exemption states that a person is not liable for contamination at a property under Part 201 if "the owner or operator of property unto which contamination has migrated unless that person is responsible for an activity causing the release that is the source of the contamination." MCL 324.20126(4)(c).

Additionally, no Historical RECs (HRECs) or Controlled RECs (CRECs) were identified in connection with the subject property.

Triterra identified the following data failure associated with historical subject property use: the first developed uses of the subject property prior to 1884 could not be determined. Based on the historical uses of the subject property, it is Triterra's opinion that the data failure is not a significant data gap.

The following limitation was encountered during Triterra's subject property walkover: Triterra was unable to access the entirety of the subject property basement due to the structural integrity of the first floor of

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the building, a portion of which was collapsing into the basement. However, based on the known current and historical uses of the subject property and the RECs identified above, it is Triterra's opinion that the limitation did not impair Triterra's ability to identify RECs in connection with the subject property.

It is the Environmental Professional's opinion that a subsurface investigation, consisting of soil and groundwater sampling, is recommended to determine if contamination is present on the subject property.

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2.0 INTRODUCTION

Triterra conducted a Phase I ESA on behalf of Gratiot County Land Bank Authority for the parcel of land located at 137 N. Mill Street in St. Louis (City of St. Louis), Gratiot County, Michigan (the subject property). The Phase I ESA was completed to identify recognized environmental conditions (RECs) in connection with the subject property.

Satisfying the Environmental Protection Agency's (EPA) All Appropriate Inquiry (AAI) is one component of the requirements for a Prospective Purchaser to qualify for the Bona Fide Prospective Purchaser (BFPP), Contiguous Property Owner, or Innocent Landowner defense to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability. For properties known to be contaminated with hazardous substances or petroleum products, the BFPP also must comply with the continuing obligations defined in CERCLA to maintain the landowner liability protection (LLP) to CERCLA.

2.1 Purpose

The Phase I ESA is performed in general conformance with the scope and limitations of the American Society for Testing and Materials Designation: E 1527-21 (ASTM E 1527-21). The ASTM standard permits a Phase I ESA User to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations as defined by the CERCLA. The overall purpose of the Phase I ESA practice is to conduct a subject property environmental site assessment regarding a range of contamination that may affect subject property soil, soil gas, and groundwater quality. ASTM defines RECs as:

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

Special cases of RECs include Historical and Controlled RECs. Historical RECs (HRECs) are defined as:

...a previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls (for example, activity and use limitations or other property use limitations).

Controlled RECs (CRECs) are defined as:

...recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations or other property use limitations).

In addition to RECs, *de minimis* conditions are also evaluated. ASTM E 1527-21 defines *de minimis* as conditions that a condition related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the



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attention of appropriate governmental agencies.

2.2 Scope of Services

In accordance with ASTM E 1527-21, the Phase I ESA performed by Triterra consists of the main components listed below. Each component contributes to the identification of RECs in connection with the subject property. “Commonly known or reasonably ascertainable information” about the subject property and a “degree of obviousness of the presence or likely presence of contamination” at the subject property are considered part of the Phase I ESA.

- Records Review
- Subject Property Reconnaissance
- Interviews
- Vapor Encroachment Screen
- Evaluation and Preparation of Phase I ESA Report

Records review includes a review of federal, state, tribal, and local government records and historical sources. The gathered information helps identify previous uses of the subject property and the surrounding area. Knowledge of the historical uses may determine if a current subject property REC is a result of the historical subject property/surrounding area operations. The records review is summarized in Section 4.0.

Subject property reconnaissance includes a visual and physical inspection of the subject property and visual observation of adjoining properties. This does not include sampling or testing of any material unless specified by an agreement between Triterra and the User before sample collection. The site reconnaissance is summarized in Section 6.0.

Interviews are conducted with subject property owners and/or occupants. Select state and/or local agency officials are also interviewed. The interviews provide otherwise unavailable information about the subject property. Information obtained during interviews is included in Sections 3.0 through 5.0 and 8.0.

A vapor encroachment screen (VES) is a Tier I component of the ASTM E 2600-22 Standard Guide that identifies if a vapor encroachment condition (VEC) exists at the subject property. A VEC is the potential presence of chemical of concern vapors in the subject property subsurface caused by a release of contaminated soil or groundwater vapor on or near the subject property. Triterra evaluates surrounding properties using The Plume Test and Critical Distance Determination Buonicore Methodology. Potential VECs are identified throughout the Phase I ESA report.

An evaluation of all gathered subject property information is presented within the Phase I ESA Report. Appropriate documentation supports the findings, opinions, and conclusions. The Phase I ESA report includes matters required pursuant to various provisions of ASTM E 1527-21.

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2.3 Special Terms, Conditions, and Significant Assumptions

Pursuant to the ASTM E 1527-21, Triterra assumes that the information provided by all sources and parties including the User is accurate and complete except where obvious inconsistencies or inaccuracies are identified. The possible contaminants of concern considered in this assessment include those listed under CERCLA as well as petroleum products, and PFAS constituents as regulated by Michigan Department of Environment, Great Lakes, and Energy (EGLE) Part 201 Residential Generic Cleanup Criteria (GCC). There were no special terms, conditions, or significant assumptions associated with the Phase I ESA.

2.4 Limitations and Exceptions

Triterra completed this Phase I ESA in general conformance with the ASTM E 1527-21 standard practice and made appropriate inquiry consistent with good commercial or customary practice. The results of the Phase I ESA are based on professional interpretation of the practically reviewable and reasonably ascertainable information available to Triterra given the time and budget constraints of the project. Triterra has assumed that information provided by the cited references is factual, complete, and correct. Triterra does not warrant that this report represents an exhaustive study of all possible environmental concerns at the subject property. However, the items investigated as part of this study represent likely potential sources of RECs and consequently may identify potential impact to soil, groundwater, and soil gas at the subject property.

2.5 Contractual Agreement

This Phase I ESA was performed in accordance with the March 29, 2024 contract by and between Gratiot County Land Bank Authority and Triterra.

2.6 User Reliance

This Phase I ESA report was prepared exclusively for the Gratiot County Land Bank Authority (referred to as the User) for the purposes stated in this report. The report may be unsuitable for other uses, and reliance on its contents by a party other than the User is done at the sole risk of that party.



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3.0 SUBJECT PROPERTY DESCRIPTION

The following subsections contain subject property descriptions, uses, and conditions. Adjoining site operations during the time of the Phase I ESA were also researched. Photographs of the subject property and surrounding areas are included in Attachment 1.

3.1 Subject Property Location and Legal Description

The subject property is located at 107 N. Mill Street in St. Louis (City of St. Louis), Gratiot County, Michigan in Township 12N, Range 03W, Section 24 (Figure 1). Triterra obtained subject property assessing and building information from the City of St. Louis on April 4, 2024. Current subject property parcel information and tax identification number 29-53-010-128-30 are included in Attachment 2.

3.2 Subject Property Use and General Characteristics

The subject property consists of approximately 0.28-acres developed with an approximately 6,448-square foot, three-story commercial/industrial building containing storage and office space. The remainder of the subject property consists of pavement, chain-link fencing and landscaping. Subject property layout and boundaries are depicted on the subject property Orientation Diagram (Figure 2).

Electrical and sewer services are provided by the City of St. Louis. Natural gas is provided by Consumers Energy. The City of St. Louis provides potable water services to the subject property.

3.3 User Provided Information

The ASTM E 1527-21 standard outlines the User responsibilities to assist in the identification of RECs in the connection with the subject property. On April 11, 2024, Ms. Terri Ball of the Gratiot County Land Bank Authority, the User representative, completed a User Questionnaire that is presented in Attachment 3. No indications of RECs were identified in Triterra's review of the questionnaire.

3.4 Environmental Liens or Activity and Use Limitations

Reviewing land title records for Activity and Use Limitations (AULs) and environmental liens (or judicial records where applicable) is a User's responsibility.

It is Triterra's understanding that Ms. Terri Ball of the Gratiot County Land Bank Authority has not completed their responsibility to "search for the existence of environmental liens and AULs that are filed or recorded against the subject property", and therefore no records, or information thereof has been provided to Triterra.

On April 15, 2024, Triterra reviewed the Remediation and Redevelopment Division Perfected Lien List, obtained from the EGLE website. According to EGLE, the information provided represents the most current publicly accessible list of properties associated with state environmental liens. No recorded environmental liens were identified in connection to the subject property.

On August 15, 2024, Triterra reviewed the United States Environmental Protection Agency (USEPA) Institutional and Engineering Controls Data for properties located in Michigan. No recorded Institutional



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and Engineering Controls Data were identified in connection to the subject property.

On April 15, 2024, Triterra reviewed the EGLE Environmental Mapper for known Activity Use Limitations associated with the subject property. According to the EGLE Environmental Mapper, no AULs are associated with the subject property.

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3.5 Current Uses of the Adjoining Sites

Known current uses of adjoining sites are summarized in the following table:

Direction	Name Address	Activity
North (Across W. Saginaw Street)	Tax Plus Consulting 214 W. Saginaw Street	Commercial Tax Services Office
	201 N. Mill Street	Vacant Commercial Building
East (Across N. Mill Street)	Flegel Tech Repair, Mom-n-Dad's Design & Décor, & Room 152 134 & 136 N. Mill Street	Commercial Retail and Entertainment
	128 & 130 N. Mill Street	Vacant Commercial Building
South	O'Boyle and Associates Insurance Agency 133 N. Mill Street	Multi-Tenant Commercial Building
	Allegory Tattoo Shop, Meadow & Lark Photography 131 N. Mill Street	
West	Todd Fisher, Attorney's Office 215 W. Saginaw Street	Commercial Attorney Services Office



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4.0 ENVIRONMENTAL RECORDS REVIEW

Triterra interviewed individuals, reviewed environmental and historical records, and reviewed local physiographic, geologic, and hydrologic information to determine historical and current land ownership and use, physical setting, and identify RECs associated with the subject property. The records and data sources were searched, and the pertinent findings are provided below.

- United States Geological Survey 7.5 Minute Quadrangle Topographic Map
- Michigan Department of Environment, Great Lakes and Energy - Scanned Water Well Records
- Michigan Department of Environment, Great Lakes and Energy – Environmental Mapper
- Environmental Data Resources Radius Map™ Report with Geochekc®
- Michigan Department of Environment, Great Lakes, and Energy - Remediation Information Data Exchange (RIDE)
- Michigan Department of Licensing and Regulatory Affairs
- Michigan Department of Environment, Great Lakes and Energy and Licensing and Regulatory Affairs Storage Tank Division Information Database
- Mid-Michigan District Health Department
- City of St. Louis – Fire Department
- Michigan Department of Environment, Great Lakes and Energy MiEnviro Portal
- United States Environmental Protection Agency Superfund Website

4.1 Physical Setting

According to the topographic map, the subject property is approximately 725-feet above mean sea level and relatively flat. The general topography trends downwards toward the north-northeast. The nearest surface water body is the Pine River located approximately 772-feet northeast from the subject property. A railroad runs approximately 0.60-miles east from the subject property.

According to a 2019 Phase II ESA report completed for a nearby site of concern (220 W. Washington Avenue) by AKT Peerless Environmental Services (AKT Peerless), the area subsurface generally consists of sand to approximately 10 feet below grade level (bgl), underlain by clay to approximately 12 feet bgl, and/or clayey sand from approximately 2 to 6 feet bgl, underlain by sandy clay to approximately 6 feet bgl. AKT Peerless encountered groundwater between approximately 7.5 to 8 feet bgl and appeared discontinuous across the site; however, according to a 2018 subsurface investigation conducted for the site by Mannik Smith Group (MSG), groundwater was encountered at between 4 to 16 feet bgl.

According to a 2016 groundwater flow model completed for the Velsicol Chemical Corp. Superfund Site by the United States Environmental Protection Agency (EPA) and CH2M, which used groundwater levels measured at 252 monitoring wells around the City of St. Louis, groundwater flow near the subject property flows north-northeast.

4.2 Environmental Database Search

Triterra retained Environmental Data Resources, Incorporated (EDR) to conduct an environmental records search of the following standard, federal, and state databases to identify documented sites that may represent RECs on and near the subject property. Portions of an April 4, 2024 environmental records search



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report prepared by EDR are provided in Attachment 4. The report contains information that is used to identify sites that may represent RECs and lists and describes sites within their respective ASTM E 1527-21 search radii of the subject property. Sites mapped by EDR are listed in the Map Findings Summary on page 4 and their location is shown on the maps preceding page 4 of the EDR report. The EDR report also provides a detailed summary of each site. Unmapped sites, as identified by EDR, are sites that for various reasons cannot be mapped through the EDR query system.

Triterra identified sites of potential concern from the EDR report and present them in the table below. Unmapped sites determined by Triterra as potential concerns within the applicable approximate minimum search distance(s) and to be suspect RECs are also included in the table. Based on the assumed groundwater flow direction, local topography, current status of the site, and/or distance from the subject property, the remaining mapped and unmapped sites do not appear to represent suspect RECs in connection with the subject property. For each site of potential concern, Triterra reviewed federal, state, tribal and local government records and historical sources, as necessary. Historical sources reviewed during the investigation are referenced in Section 5.0. Descriptions of the identified sites of potential concern are provided below.

EDR SITES OF POTENTIAL CONCERN		
Site Name and Address	Approximate Distance and Direction from subject property ¹	Name of List ²
Velsicol Chemical Company 500 N. Bankson Street (Various Addresses)	235 feet west	NPL, SEMS, CORRACTS, RCRA-LQG, US ENG Controls, US INST Controls, ROD, PRP, Consent, PFAS NPL, NY Manifest
220 West Washington Avenue 220 West Washington Avenue	159 feet southwest	Part 201, Inventory
St. Louis Marathon 220 W. Washington Avenue		LUST, UST, Inventory, Financial Assurance, UST Finder, AST, Brownfields
Scotland Oil Co Inc 220 W. Washington Avenue		EDR Hist Auto
Bottom Bros Oil Co 210 & 218 W. Washington Avenue		EDR Hist Auto
City of St. Louis 108 W. Saginaw	254 feet northeast	UST

¹EDR sites are mapped by address. Distances and/or site directions listed above may be adjusted from those reported by EDR to better represent field conditions and potential site boundaries.

²Definitions of acronyms and lists are presented in the EDR report.

It should be noted that 118 W. Washington Avenue, listed as an open LUST by the EDR report, is located approximately 350 feet southeast from the subject property, across N. Mill Street and a row of commercial buildings. Based on distance from the subject property (greater than 300 feet), the potential for underground utilities beneath N. Mill Street and existing structures to redirect potentially migrating



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contamination, and that groundwater flow for the area is reported to flow north-northeast, away from the subject property, it is Triterra's opinion that the site does not represent a site of potential concern in connection with the subject property.

Triterra reviewed available files from EGLE and the Michigan Department of Licensing and Regulatory Affairs (LARA) online FOIA system(s), in addition to EGLE's Remediation Information Data Exchange (RIDE) online information system, on April 15, 2024. Information from the file review was used to form an opinion for these offsite locations. Triterra also reviewed records on the United States Environmental Protection Agency (EPA) website on April 24, 2024.

Velsicol Chemical Company – 500 N. Bankson Street (currently spans various addresses) is located approximately 236 feet west of the subject property and is listed as a National Priority List (NPL), Superfund Enterprise Management System (SEMS), Corrective Action Report (CORRACTS), Resource Conservation and Recovery Act (RCRA) large-quantity generator (LQG), United States (US) Engineering (ENG) Controls, US Institutional (INST) Controls, Record of Decision (ROD), Potentially-Responsible Party (PRP), Consent, Per- and polyfluoroalkyl substances (PFAS) NPL, and New York (NY) Manifest site. According to the Velsicol Chemical Superfund Site, Operable Unit 1, Phases 1 and 2 Adjacent or Nearby Properties Remedial Action Report dated June 2016 (henceforth referred to as the 2016 Remedial Action Report), historical operations at the site included a lumber mill, oil refinery, salt processing, and chemical manufacturing between the mid-1930's and 1977. By 1935, Michigan Chemical Corporation (MCC) purchased the site and operated a chemical manufacturing business, at which MCC manufactured a wide variety of products at the main former plant site (FPS), including various salts, magnesium oxide, "rare earth" (radioactive) chemicals, various fire retardants, and various pesticides. In 1965, Velsicol Chemical Corporation gained a controlling interest in MCC. The FPS features included numerous buildings that housed manufacturing, maintenance operations, administrative functions, and laboratories for product research and development, storage facilities for raw and finished products (including warehouses, aboveground storage tanks (ASTs), and USTs). Historical documents identify several lagoons onsite that are either known or presumed to be associated with waste disposal practices. In 1977, the MCC production plant was closed. Demolition and decommissioning activities began in 1978. The aboveground site buildings were razed, and some structures were buried onsite, including storage tanks and process piping. Building and tank foundations were not removed, and a significant amount of debris remains buried at the site.

To address contamination discovered at the FPS, Velsicol, the EPA, and the State of Michigan entered a consent agreement in 1982, and several Records of Decision (RODs) and various studies and remedial actions have been completed to assess and address the extent of contamination, the exact chemicals of concern (COCs), and the risk of the site to human and environmental health throughout the City of St. Louis. The site is divided into three main operable units (OUs) by the EPA: OU1 is the FPS and "Adjacent or Nearby Properties" (ANPs), OU2 defines an area of contaminants in the Pine River (for which remediation was completed by June 2016), and OU3 defines an area of the Pine River downstream of the City of St. Louis hydroelectric dam. It should be noted that the FPS extends from approximately 1,333 feet northwest of the subject property to approximately 1,800 feet west of the subject property; however, the ANP area of OU1 extends to the approximately 236 feet west of the subject property. Remediation activities for all OUs is ongoing.

On June 22, 2012, EPA issued the ROD for OU1. The ROD concluded that existing contamination in soils at select properties (ie, not continuous across the entire ANP) in the ANP presented unacceptable risk to both human and ecological receptors. The ROD identified excavation and offsite disposal of residential soils



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exceeding cleanup standards as the remedial action for the ANP. The major components of the remedy for OU1, as presented in the 2012 ROD and the aforementioned 2016 Remedial Action Report, included the following: inventory and documentation of site conditions that required remediation; excavation of soil exceeding remediation goals (RGs) to predetermined depths ranging from 1 to 3 feet bgl; post-excavation soil sampling from the bottom of the excavation to document residual concentrations in soil; backfilling of excavated properties with clean topsoil; placement and securing of an erosion soil cover blanket over each area to prevent erosion over the winter months; restoration of excavated areas in spring 2013; and collection of waste characterization samples from excavated soil to verify that the soil was not hazardous. These remediation activities for the ANP were reportedly completed between December 2013 and 2016, and according to the most recent Five-Year Review Report for the site completed by the EPA, the cleanup criteria for the identified COCs were all met; however, analytical results and figures regarding exact sampling and remediation activity locations for the ANP are redacted in available records for legal and/or privacy purposes, therefore Triterra is unable to confirm the exact distances between the extent and type previous contamination and the subject property. However, due to EPA records indicating that the soil remediation of the ANP is considered to be complete according to parameters established by the 2012 ROD, it is Triterra's understanding that the concentrations of COCs in soil in the ANP was reduced to levels below method detection limits and/or applicable regulatory criteria, and therefore the site/ANP does not represent a vapor encroachment and/or intrusion concern in connection with the subject property.

The extent of groundwater contamination across the ANP and/or in association with the site, which extends within 300 feet of the subject property, remains unknown to Triterra. However, on April 23, 2024, Triterra interviewed one of the EPA's Remedial Project Manager for the Veliscol Superfund site, Ms. Jennifer Knoepfle, who indicated that the groundwater pathway of human exposure has been limited by the connection of the City of St. Louis to the Gratiot Area Water Authority's municipal water source in addition to various other institutional controls associated with the Superfund site. Additionally, according to 2016 groundwater flow model completed for the site by the EPA and CH2M, groundwater flow near the subject property flows north-northeast, which further reduces the likelihood of migration of contamination associated with the site into the subsurface of the subject property. Therefore, based on the completion of various soil remediation activities and the various institutional controls established for OU1 (such as the connection of the City of St. Louis to a municipal water system, the Gratiot Area Water Authority) to limit human contact with contaminated soils and/or groundwater, as well as groundwater flow direction away from the subject property, it is Triterra's opinion that the site does not represent a REC in connection with the subject property.

St. Louis Marathon – 220 W. Washington Avenue (currently vacant) is located approximately 159 feet southwest of the subject property and is listed as a Part 201, Inventory, leaking underground storage tank (LUST), Financial Assurance, underground storage tank (UST) Finder, UST, Michigan Brownfields, and historical automotive site (EDR Hist Auto). According to available historical records, by at least 1884, the site was developed with three buildings, occupied by a stable, church, and drugstore, respectively, until at least 1888. By at least 1893, the drugstore was occupied as a residential house. The site remained relatively unchanged until at least 1899. By at least 1910, the church building was razed and a new building constructed. The new building was occupied as a church. By at least 1924, the stable was razed, and a small auto garage, likely associated with the residential house, was constructed. By at least 1948, the residential house was converted into a gasoline filling station with at least three associated USTs. Additionally, another small auto garage was constructed to the north of the church, and another building was constructed and occupied as an oil warehouse by at least 1948. By at least 1957, the small garage building was razed, and church, gasoline filling station, and oil warehouse operations continued onsite. The site appeared relatively



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unchanged until at least 1963. Historical addresses for the site included 210, 218, 220, and 22 W. Washington Avenue. By at least 1972, construction activities appear to occur onsite in aerial images, and the church, former gasoline filling station, and oil warehouse buildings were razed. By at least 1986, a new commercial building, and a pump island canopy, were constructed. By at least 1998, an addition was made to the commercial gasoline filling station building. The site was occupied by various gasoline filling stations since the 1960's, and has been vacant since at least 2014.

According to EGLE records, the following USTs are registered to the site:

Tank ID	Volume (Gallons)	Contents	Installed	Status
UTK-040562-15	6,000	Diesel	4/25/1976	Removed
UTK-060393-15	6,000	Diesel	4/25/1976	Removed
UTK-060398-15	6,000	Diesel	4/25/1976	Removed
UTK-060401-15	2,000	Kerosene	4/25/1976	Removed
UTK-000313-15	8,000	Gasoline	4/25/1986	Temporarily Out-of-Use
UTK-060406-15	4,000	Gasoline	4/25/1986	Temporarily Out-of-Use
UTK-060409-15	8,000	Gasoline	4/25/1986	In-Use
UTK-060414-15	2,000	Diesel	5/1/1989	Temporarily Out-of-Use

According to available EGLE records, a release of diesel fuel (Leak Number C-0250-18) and a release of gasoline (Leak Number C-0249-18) were confirmed for the site in November 2018, and remain open.

According to a Phase II ESA completed by AKT Peerless dated May 21, 2019, between June 2018 and April 2019, MSG and AKT Peerless conducted subsurface investigations, respectively, to address historical gasoline filling station, auto repair, oil warehouse operations, and offsite concerns. During the course of the subsurface investigations, a total of 23 soil borings were advanced onsite to maximum depths of 16 to 20 feet bgl, and at least ten borings were converted into temporary monitoring wells to collect soil and groundwater samples. Additionally, MSG conducted a limited geophysical survey, and identified four anomalies consistent with USTs on the western portion of the site, and were deemed consistent with available information pertaining to UTK-000313-15-15, UTK-060406-15, UTK-060409-15, and UTK-060414-15. Soil and groundwater samples were submitted for laboratory analysis of one or more of the following parameters: volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PNAs), polychlorinated biphenyls (PCBs), and select metals (lead, cadmium, and/or chromium).

Various VOCs, PNAs, total chromium, and lead were detected at concentrations exceeding Part 201 Residential GCC in soil and groundwater across the site. Groundwater analytical results from sampling locations closest to the subject property (B-9TMW and SB-11-W, between approximately 236 and 264 feet southwest of the subject property) indicated that total chromium, lead, and various VOCs were present at concentrations in exceedance of Part 201 Residential GCC in shallow groundwater. Furthermore, the extent of the plume of contamination is unknown to Triterra. According to groundwater flow models conducted



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to assess the Velsicol Superfund Site (see site summary above), groundwater in the area of the subject property flows north-northeast. Thus, potential exists for existing contamination to have migrated onto the subject property and impacted the subsurface. Therefore, in Triterra's opinion, the site represents a REC in connection with the subject property.

City of St. Louis – 108 W. Saginaw Street (currently a vacant building) is located approximately 254 feet northeast of the subject property and is listed as an UST site. According to available historical records, the site was developed as a fire engine house by at least 1884, and was occupied by the fire department and/or city hall between at least 1884 to 2020. The site building is currently vacant.

According to available LARA records, correspondence between the city manager of St. Louis and the Michigan State Police – Fire Marshall Division dated July 19, 1991 indicates that there never was an UST onsite, and that an UST was documented for the site as an error during the course of a limited subsurface investigation that was conducted to design a footing for the building onsite. In Triterra's opinion, based on no existing UST and/or no evidence of a suspected release or other contamination for the site, the site does not represent a REC in connection with the subject property.

4.3 Additional Environmental Record Sources

4.3.1 Health Department Records

Triterra contacted the Mid-Michigan District Health Department to request any available information pertaining to environmental concerns associated with the subject property, including information on any septic systems and water wells located on the subject property. According to an April 5, 2024, response from Ms. Tammy Eurich of the Mid-Michigan District Health Department, no records were available for the subject property.

4.3.2 Fire Department Records

Triterra contacted the City of St. Louis Clerk's Office to request any available fire department and building records associated with the subject property. According to an April 4, 2024, response from Ms. Jamie Long, City Clerk no fire department records were available for the subject property.

4.3.3 Geological Survey Records

Triterra queried the State of Michigan Geological Survey Division's (GSD) Drilling Unit Maps for oil and gas permits/wells for the subject property's township, range, and section number. According to the April 10, 2024 query results, no known active oil and/or gas wells exist, and no permits have been recorded for the subject property section number.

4.3.4 Other Environmental Records

No other environmental records were reviewed as a part of this Phase I ESA.



5.0 HISTORICAL RECORDS REVIEW

Triterra reviewed historical records to develop a history of the subject property and surrounding area and identify any past uses that may have led to RECs in connection with the subject property. Abstracted histories of the subject property and proximate sites, which Triterra obtained from reasonably ascertainable historical records, are provided in the table below. Copies of the available historical records are provided in Attachment 5.

Triterra reviewed the following historical records:

- Sanborn Fire Insurance Maps (1884, 1888, 1893, 1899, 1910, 1924, 1948, 1957)
- Aerial Images (1938, 1956, 1963, 1972, 1986, 1998, 2006, 2009, 2012, 2016, 2020)
- City Directories (1960, 1965, 1970, 1975, 1980, 1985, 1990, 1992, 1995, 2000, 2005, 2010, 2014, 2017, 2020)
- Topographic Maps (1935, 1938, 1973, 2014, 2016, 2017, 2019)
- Historical Assessing Records
- User Interview (see Section 3.3)
- Owner Interview (see Section 7.1)
- Consumers Energy SIMS
- Subject property walkover (See Section 6.0)

5.1 Subject Property – Historical Use Information

A summary of historical usage of the subject property back to 1884, the date of earliest readily available records, is presented in the following table:

Year / Period	Identified / Inferred Use
1884 – 1893	<p>The subject property is developed with three commercial buildings and one outbuilding by at least 1884. One of the subject property’s buildings is occupied by a tailor, and the larger building (The Harrington) is occupied by the following commercial operations: hotel office and rooms, bank, cobbler (“boots & shoes”), barber, saloon & billiards, jewelry, and a drugstore. One of the commercial buildings is reportedly vacant in at least 1884. Hotel operations appear to largely take place on the second and third floors of The Harrington building, while other commercial operations take place on the first floor. A gasoline UST (exact capacity unknown) is located on the southwest corner of the subject property.</p> <p>By at least 1888, the vacant building is occupied as a hotel sample room, the tailor’s building is occupied by hotel laundry operations, and the outbuilding is occupied as a “wool house.” By at least 1893, cobbler operations no longer occupy the first floor of The Harrington, and a grocery and feed store has replaced the operation. The outbuilding is occupied as a wood house by at least 1893. Overall, The Harrington operations remain relatively unchanged during this time, and the gasoline UST is no longer depicted in Sanborn maps by at least 1888.</p>
1899 – 1910	<p>The wood house, hotel sample room building, and the hotel laundry buildings have been razed by at least 1899. A bath house is constructed as an addition to the western portion of the subject property, and a mineral well is depicted in the southwest corner of the subject property in the vicinity of the previously described gasoline UST. The Harrington hotel operations, as well as bank, jewelry, barber, a sample room, and saloon businesses, continue to operate on the</p>

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Year / Period	Identified / Inferred Use
	<p>subject property.</p> <p>By at least 1910, The Harrington hotel operations cease on the subject property, and the first floor of the subject property building continues to be occupied by a bank and jeweler. A confectionary and a racket store (ie, general store) also occupy commercial spaces on the first floor during this time. An office now occupies the former dining room space, and the bath house is occupied as a wool warehouse. The mineral well is no longer visible in Sanborn maps.</p>
1924 – 1957	<p>By at least 1924, the former wool house and office area of the subject property building are occupied by printing operations and a rest room, respectively. A bank continues to occupy the northeastern portion of the subject property building, and two stores occupy the southeastern portion of the building. The subject property remains relatively unchanged between 1924 and 1948.</p> <p>By at least 1957, the bank and two of the aforementioned stores no longer occupy the subject property building. One store occupies the southeastern portion of the subject property building. The former printing space is occupied as an office, and the rest room continues to occupy the central portion of the subject property building.</p>
1960 – 1975	<p>By at least 1965, the following commercial businesses occupy the subject property building: Commercial Savings Bank, Schultz Thompson Kaarup & Associates Bookkeeping Service, Ludlum Louis O Dentist, Saint Louis Lodge No 188. The subject property building is reportedly vacant in 1975.</p>
1980 – 1990	<p>By at least 1980, the subject property building is partially occupied as residential apartments. Between at least 1985 and 1990, the subject property is occupied by the Masonic Temple in addition to residential apartments. The subject property building is reportedly occupied for residential purposes until at least 1995.</p>
2000 – Present	<p>The subject property has been vacant/unoccupied since at least 2000.</p>

Based on Triterra’s review of historical information, the subject property was developed with at least three commercial buildings and one outbuilding by at least 1884. Occupants of the subject property between at least 1884 and 1893 included one or more of the following: a tailor, hotel and hotel laundry operations (The Harrington), bank, cobbler, barber, saloon and billiards, jewelry store, drugstore, grocery and feed store, and a wood house and/or wool house. By at least 1899, the aforementioned outbuilding and two of the previous commercial buildings were razed, and an addition was made to the western portion of the main subject property building (the currently existing building, which continued to be occupied by The Harrington on the upper floors and commercial storefronts on the first floor in 1899). The Harrington hotel operations ceased on the subject property by at least 1910, and portions of the subject property building were occupied by a bank, jeweler, confectionary, racket store, office, and a wool warehouse. By at least 1924, the former wool house and office area of the subject property building were occupied by printing operations and a rest room, respectively. Bank operations continued to occupy the northeastern portion of the subject property building during this time, and two unspecified stores occupied the southeastern portion of the building. The subject property remained relatively unchanged between 1924 and 1948. By at least 1957, the bank and two of the aforementioned stores no longer occupied the subject property building; one store occupied the southeastern portion of the subject property building, the former printing space was occupied by an office, and the rest room continued to occupy the central portion of the subject property building. Several commercial operations, including banking operations, occupied the subject



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property building between 1960 and 1965, and the subject property building was reportedly vacant by at least 1975. Between at least 1980 and 1995, the subject property is occupied by residential apartments and/or the Masonic Temple. The subject property building has been vacant since at least 2000.

According to Triterra's review of available historical information, historical laundry operations occurred on the subject property between at least 1888 and 1893 in association with hotel operations. The scope of laundry operations (ie, potential dry cleaning, chemical cleaning agents potentially used, historical waste disposal practices, etc) is unknown to Triterra. In Triterra's experience, gasoline and kerosene were used as cleaning agents for laundry in the late 1800's to early 1900's. Therefore, the potential exists for hazardous substances and/or petroleum products used in association with historical laundry operations to have impacted the subsurface of the subject property, which represents a REC in connection with the subject property.

Additionally, historical printing operations occurred on the subject property between at least 1924 and 1948. Historical printing operations are known for the use of paints, inks and/or other hazardous substances, which may have been released and impacted the subsurface of the subject property. Therefore, historical printing operations represent a REC in connection with the subject property.

Furthermore, a gasoline UST of was documented in the southwestern corner of the subject property on Sanborn maps in 1884. Triterra encountered no records regarding UST installation and removal dates, UST construction, capacity, etc. Therefore, the potential exists for the UST to have been abandoned-in-place on the subject property, and unknown and/or undocumented releases may have occurred and impacted the subsurface of the subject property. Thus, the potential for an abandoned UST on the subject property represents a REC in connection with the subject property.

Triterra identified the following data failure associated with historical subject property use: the first developed uses of the subject property prior to 1884 could not be determined. Based on the historical uses of the subject property (commercial), it is Triterra's opinion that the data failure is not a significant data gap.

5.2 Historical Heating Source

According to the Consumers Energy Service Information Management System (SIMS) website, natural gas was routed to the subject property in 1954. Therefore, the possibility exists that alternative heating fuels (i.e. steam, propane, wood, electric, coal, and/or fuel oil) were used by previous occupants of the subject property prior to the connection of natural gas. According to Sanborn maps, by at least 1888, the subject property building was heated by "stoves," presumably wood-fired, based on a wood storage shed on the subject property, and the subject property was heated by steam by at least 1899. Triterra reviewed readily available and reasonably ascertainable records in an attempt to identify the historical heating source and/or other historical heating sources. No records were identified that suggested the use of heating oil or the former presence of a heating oil tank (AST or UST) at the subject property. Due to the extent of time elapsed since installation of natural gas; Triterra did not identify a knowledgeable party to interview regarding the historical heating source. Therefore, in Triterra's opinion the unknown historical heating source does not represent a REC in connection with the subject property.



In the event that historical heating sources (i.e. coal, fuel oil, etc.) are encountered during future development or subject property use, Triterra recommends the source be properly removed and disposed in accordance with applicable federal, state, and local regulations.

5.3 Proximate Sites of Potential Concern – Historical Use Information

An attempt was made to assess the historical uses of proximate sites by reviewing records referenced in Section 5.0. Adjoining sites of concern identified in the course of researching the subject property itself are also described in Section 4.2.

214 W. Saginaw Street adjoins the subject property to the north, across W. Saginaw Street. According to available historical records, the site was occupied by a stable, at least one outbuilding, and a portion of a multi-tenant commercial building (201 N. Mill Street, occupied by a telephone office and drugstore) between at least 1884 and 1888. By at least 1893, at least one outbuilding was razed, and the aforementioned commercial building was expanded to occupy the site. The stable remained onsite. A jewelry store, restaurant, and clothing store occupied the commercial building by at least 1899. By at least 1910, the addition to the commercial buildings was removed, and the site was partially occupied by a jewelry store and the site was otherwise undeveloped. By at least 1924, the site was developed with the currently existing commercial building, which was occupied as a flat. By at least 1948, the site was occupied as rooming, and was occupied by an unspecified vendor in 1957. Between at least 1960 and 1970, the site was occupied by Capital Business Services, in addition to the General Telephone Company of Michigan and/or residential purposes. By at least 1975, the site was occupied for residential purposes. By at least 1980, the site was occupied by The Oswald Insurance Agency and residential purposes, and between at least 1985 and 1995, the site was occupied beauty salons and residential purposes (Ione's Beauty Salon and Cut N Curl). Between at least 2000 and 2020, the site was occupied by Recovery Unlimited Counseling Services. The site is currently occupied by Tax Plus Counseling Services. In Triterra's opinion, historical uses of the site do not represent a REC in connection with the subject property.

201 N. Mill Street adjoins the subject property to the north, across W. Saginaw Street. According to available historical records, the site was developed with the currently existing multi-tenant commercial building by at least 1884, which was occupied as a drugstore and telephone office until at least 1893. By at least 1899, the building was occupied by a clothing store and restaurant, and by at least 1910, the building was occupied by a restaurant and pub, and a jewelry store. The site was occupied by two unspecified stores by at least 1948, and one outbuilding (utilized for storage) was constructed to the west of the commercial building. The site remained relatively unchanged between 1948 and 1957. The site was occupied by a confectionery and a jeweler's between at least 1960 and 1970, and the jeweler's location was occupied by a barber's shop by at least 1975. By at least 1980, the site was vacant. Between at least 1985 and 1995, the site was occupied by Pringle's Music store and a video rental store. By at least 2000, the site was occupied by a Western Union. The site was occupied by Jesus's Coffee House in 2010, followed by The Baker's Dozen of Mid-Michigan by at least 2017. In 2020, the site was occupied by Uptown Treasures, a retail store. The site is currently vacant. In Triterra's opinion, historical uses of the site do not represent a REC in connection with the subject property.

134 & 136 N. Mill Street adjoins the subject property to the east, across N. Mill Street. According to available historical records, the site was developed with the three existing, adjoining multi-tenant commercial buildings occupied by one or more of the following operations between 1884 and 1910: unspecified offices, clothing retail, photo store, dry goods stores, a post office, and a drugstore. By at least

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1924, the post office portion of the site was occupied as an unspecified retail store, and the southern portion of the site continued to be occupied as a drugstore and an unspecified retail store. The site was occupied by three unspecified retail stores between at least 1948 and 1957. Between at least 1960 and 1990, the site was occupied by D&C Stores Inc (a five-to-a-dollar store), and the site was occupied by St. Louis Variety Store between at least 2000 and 2017. The site is currently occupied by Flegel Tech Repair, Mom-n-Dad's Design & Décor, and Room 152 (a multi-tenant commercial building). In Triterra's opinion, historical uses of the site do not represent a REC in connection with the subject property.

128 & 130 N. Mill Street adjoins the subject to the east, across N. Mill Street. According to available historical records, the site was developed with the two existing adjoining multi-tenant commercial buildings by at least 1884, and was occupied by one or more of the following operations between 1884 and 1899: dry goods store, hand-printing office, furniture, an unspecified office, and a hardware store/tin shop. By at least 1910, the hardware and tin shop area continued to occupy the southern portion of the site, and billiards occupied the northern portion. An unspecified store occupied the northern portion of the building by at least 1924, and an unspecified store occupied the previous hardware store/tin shop location between at least 1948 and 1957. Between at least 1957 and 1975, a bakery occupied the northern portion of the site. The northern portion of the site was occupied by a records-and-book rental location by at least 1980. Peter's Hardware occupied the site from at least 1985 to 2020. The site is currently vacant.

According to Triterra's review of historical information, historical tin shop operations occupied the southeastern portion of the site from at least 1888 to 1924. Metals and other hazardous substances would have been used/stored onsite, and may have been released and impacted the subsurface. However, in Triterra's opinion, it is unlikely that the potential contamination has migrated onto the subject property, as tin shop operations reportedly occurred on the second floor of the building, which reduces the likelihood of contamination reaching the subsurface, and operations reportedly occurred approximately 150 feet southeast, across N. Mill Street and the hardware shop operations onsite. Additionally, groundwater has been documented to flow north-northeast in the vicinity of the subject property, away from the subject property, which further reduces the potential for migration of contamination potentially associated with the site onto the subject property. Therefore, in Triterra's opinion, it is unlikely that potential contamination reached the subsurface, and/or that contamination has migrated onto the subject property. Thus, in Triterra's opinion, historical uses of the site do not represent a REC in connection with the subject property.

131 & 133 N. Mill Street adjoins the subject property to the south. According to available historical records, the site was undeveloped in 1884, and was developed with the two existing adjoining multi-tenant commercial buildings with three storefronts by at least 1888. Between at least 1888 and 1899, the site was occupied by one or more of the following commercial operations: grocery store, dry goods, clothing retail, boots & shoes retail, and/or unspecified offices. By at least 1910, all three storefronts were reportedly vacant, and by at least 1924, the site was occupied by three unspecified stores. By at least 1948, the site was occupied by two unspecified stores and a restaurant, followed by three unspecified stores by at least 1957. Piccolo's Package Stores Liquors occupied one of the buildings from at least 1960 to 1965, and St. Louis Automotive Supplies (an auto parts store) occupied the remainder of the site between at least 1965 to 1990. By at least 2005, Clipper's occupied the site, followed by Victoria's Flowers and Crafts in 2020. The site has been occupied by O'Boyle Associates Insurance Agency since at least 2017, and photography businesses (Sarah Lee Photography and/or Meadow Lark Photography) since at least 2020. The site is also currently occupied by Allegory Tattoo Shop. In Triterra's opinion, historical uses of the site do not represent a REC in connection with the subject property.

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215 W. Saginaw Street adjoins the subject property to the west. According to available historical records, the site was developed with one commercial building, and one commercial building and outbuilding partially onsite by at least 1884. The westernmost commercial building was occupied by printing operations, and the other building, partially on the western portion of the subject property, was reportedly vacant. Between at least 1888 and 1893, the partial building was occupied as a hotel sample room in association with subject property operations and the outbuilding was occupied as a woodhouse. The aforementioned printing building was occupied by steam printing operations by at least 1888, followed by office and paint shop operations by at least 1893. By at least 1899, the printing building and previously “shared” buildings with the subject property, were razed, and three buildings were constructed onsite; one was occupied as an unspecified office, one was occupied as a storeroom, and the other building was vacant and/or utilized for storage. By at least 1910, the westernmost and southernmost buildings were razed, and a new building to the west was constructed. The two buildings onsite in 1910 were occupied by agricultural imports. By at least 1924, the two aforementioned buildings were razed, and the site was an undeveloped/vacant lot. By at least 1938, a commercial building was constructed onsite, and was occupied as a doctor’s office between at least 1948 and 1975. Between at least 1980 and 2000, the site was occupied by attorney’s offices (Montigel Mackie & Harris and/or Patricia Harris’ office). The site has been occupied by Todd Fisher’s office since at least 2010.

According to Triterra’s review of historical information, printing operations occurred onsite between at least 1884 and 1893. Historical printing operations are known for the use of paints, inks and/or other hazardous substances, which may have been released and impacted the subsurface. The potential exists for contamination to have migrated onto the subject property. Based on proximity to the subject property, it is Triterra’s opinion that historical uses of the site represent a REC in connection with the subject property.

126 N. Mill Street During Triterra’s review of historical uses of adjoining sites, Triterra identified a gasoline UST located in the N. Mill Street right-of-way, approximately 60 to 70 feet southeast of the subject property (adjacent to 126 N. Mill Street) in Sanborn maps from at least 1924 to 1948. The UST contents, capacity, construction, installation and/or removal date(s) are unknown to Triterra. Unknown and/or undocumented releases may have occurred and impacted the subsurface. Based on proximity to the subject property (less than 100 feet), the potential exists for contamination to have migrated onto the subject property. Therefore, in Triterra’s opinion, the gasoline UST in the right-of-way of N. Mill Street represents a REC in connection with the subject property.

Triterra identified the following data failures associated with historical uses on adjoining sites of potential concern: the first developed uses of the various sites prior to 1884 could not be determined, and/or exact site uses could not be determined for various periods of time. Based on the known current and historical trends in the area (commercial offices and retail), and with the RECs identified above, it is Triterra’s opinion that the data failures did not represent significant data gaps in connection with the subject property.



6.0 SUBJECT PROPERTY RECONNAISSANCE

The subject property reconnaissance was conducted to identify evidence of the presence of suspect RECs in connection with the subject property. Descriptions of the current subject property use and conditions are presented in the following sections.

6.1 Methodology and Limitations

On April 19, 2024, Mr. Greg Ross on behalf of Triterra completed a subject property walkover to observe and record the subject property use and conditions. Mr. Ross was accompanied by Mr. Kurt Giles, St. Louis City Manager, and Mr. Mike Parsons, the Electric Department Head, during the subject property walkover. Photographs taken during the walkover are included in Attachment 1.

The following limitation was encountered during Triterra's subject property walkover: Triterra was unable to access the entirety of the subject property basement due to the structural integrity of the first floor of the building, a portion of which was collapsing into the basement.

6.2 General Observations

The subject property consisted of a three-story building comprised of a commercial office space. The remainder of the subject property consisted of landscaping. At the time of the reconnaissance, the building was currently unoccupied and/or utilized for storage.

6.2.1 Chemical Use, Storage, and Disposal

Triterra observed some common cleaning chemicals which were typically stored in containers with volumes of one gallon or less and were reportedly consumed during use. Triterra identified no suspect RECs associated with the observed chemical use and storage in the buildings on the subject property.

6.2.2 USTs and ASTs

Triterra observed two pipes of unknown use within the subject property building (Photos 15 & 16). However, based on the pipe locations and constructions, the pipes did not appear to be associated with a former UST system, and were likely associated with historical hotel laundry operations. Triterra did not observe additional evidence of current or former UST systems (e.g., vent pipes, fill ports, dispensing pumps, patched pavement, etc.) nor evidence of current or former AST systems (e.g., stands, secondary containments, etc.) on the subject property.

Triterra observed an area of the basement floor that appeared to be stained and/or covered in dark patches; however, based on olfactory and visual evidence (no chemical/petroleum odor, strong mildew/moisture odor, no visual evidence of former aboveground chemical storage such as the base-shape of the potential former container), the staining appeared to be associated with moisture and/or flooding (Photo 11). Therefore, in Triterra's opinion, the staining does not represent a REC in connection with the subject property.

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6.2.3 PCB Containing Equipment

Triterra observed a pole-mounted transformer on the southwestern portion of the subject property. No labels were observed that indicated the PCB content of the transformer. Triterra observed no evidence of leakage or staining on the ground surrounding the transformer. In Triterra's opinion the transformer does not represent a REC in connection to the subject property.

6.2.4 Drains and Sumps

Triterra observed typical floor drains within the building. The drains appeared in working condition and reportedly lead to the municipal sewer system with the exception of one former floor drain that was observed in the basement, which appeared to no longer be in working condition (Photo 13). In Triterra's opinion, the floor drains do not represent a REC in connection with the subject property.

6.2.5 Pits, Ponds, and Lagoons

Triterra observed no visual evidence of pits, ponds, or lagoons on the subject property.

6.2.6 Heating and Cooling

According to assessing records, the building currently utilizes no functioning heating and cooling system.

6.2.7 Solid Waste Generation and Disposal

Triterra observed typical household and office waste within the subject property building. Additionally, Triterra observed a pile of outdoor storage of bricks, rocks, some wood planks, and plastic totes/buckets full of stagnant rainwater and/or landscaping materials on the western portion of the subject property (Photos 21 – 23). Triterra observed no evidence of chemical storage, stressed vegetation, staining, etc in association with the bricks, wood, plastic totes, etc on the subject property. Therefore, in Triterra's opinion, the outdoor storage of the wood, bricks, etc does not represent a REC in connection to the subject property.

6.2.8 Additional Features

Triterra observed no visual evidence of additional features at the subject property which were indicative of suspect RECs in connection with the subject property.

6.3 Proximate Site Observations

Refer to Section 3.5 for a list of adjoining sites. Triterra observed no evidence of conditions on adjoining sites that would potentially impact the subject property.



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7.0 INTERVIEWS

Information obtained from interviews was used to determine historical and current land ownership and use and is discussed below. Information obtained during the interviews is included in Attachment 6 and is discussed in context in Sections 5.0 and 6.0.

7.1 Subject Property Owner

On April 11, 2024, Triterra interviewed Ms. Terri Ball of the Gratiot County Land Bank Authority, the Owner representative, to determine any subject property information as it pertains to the purpose of the Phase I ESA. The Owner representative also completed a questionnaire that is included in Attachment 6. Ms. Ball has been affiliated with the subject property for less than one year, and mentioned that the subject property building was historically occupied as a bank, and that the subject property is located in the City of St. Louis' Historical District. No RECs were identified in connection with the subject property based on the interview and Triterra's review of the questionnaire.

7.2 Past Owner, Operators and/or Occupants

Past owners, operators, and occupants were not identified and/or available at the time of this report.

7.3 State and/or Local Agency Officials

Refer to Sections 4.3.1 and 4.3.2 for a discussion of State and Local agency provided information for the subject property.

7.4 Other Individuals

Given that the subject property is not abandoned and no evidence of uncontrolled access or dumping was observed during the site visit, no adjoining property owners were interviewed during the course of this investigation.



8.0 NON-SCOPE SERVICES

8.1 Per- and polyfluoroalkyl substances

Per- and polyfluoroalkyl substances (PFAS) are found in various industrial applications and consumer products such as carpeting, waterproof clothing, upholstery, food paper wrappings, personal care products, fire-fighting foams, and metal plating. They are long lasting chemicals, components of which break down very slowly over time. Exposure to some PFAS in the environment may be linked to harmful health effects in humans and animals.

PFAS is not currently listed as a hazardous substance on the CERCLA List of Lists; however, Michigan has identified several PFAS analytes within EGLE Part 201 Generic Cleanup Criteria (GCC). Per ASTM E 1527-21, PFAS is identified as an “emerging contaminant” and is addressed within this report as a Business Environmental Risk. A Business Environmental Risk (BER) is defined by ASTM as “a risk that can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of commercial real estate, not necessarily related to those environmental issues required to be investigated in this practice.

8.1.1 Michigan PFAS Action Response Team (MPART)

The Michigan PFAS Action Response Team (MPART) is a multi-discipline agency with the goal of identifying sources of PFAS, addressing PFAS contamination at the sources, and working with local health departments to protect people in areas where groundwater is impacted by PFAS. MPART efforts have begun sampling drinking water, surface water, groundwater, and wastewater from wastewater treatment plants (WWTP), municipal and residential drinking water wells, surface water bodies, fire departments, landfills, commercial airports, and various manufacturing, industrial, superfund and hazardous waste sites throughout Michigan since 2018.

On April 5, 2024, Triterra queried the MPART/EGLE Michigan PFAS Site mapper for sites of known PFAS impact. According to the mapper, no PFAS sites were identified at the time of this report within one mile of the subject property.

8.1.2 Historical and Current Operations

Triterra reviewed records referenced in Section 5.0. to identify current and historical operations associated with PFAS manufacture or use on the subject property and adjoining sites. Operations associated with PFAS include commercial and military airports, military bases and training sites, fire departments, metal plating, chemical manufacturers (ex. DuPont, 3M/Dyneon, BASF, Ciba, Clariant, Chemguard, Arkema, Asahi, Daikin, Kiddle-Fenwal, National Foam, Dynax, and Solvay Solexis), manufacturing (ex. non-stick surface, water repellants, and stain resistant products), cosmetics, aerospace, automotive, construction, and electronics.

According to a review of historical records referenced above, no adjoining sites were identified to have an elevated risk of PFAS containing materials.

8.1.3 Subject Property Fire Suppression

There are two major types of firefighting foam, Class A and Class B. Class A foams generally do not contain

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PFAS. Class B foams can be divided into two categories: fluorinated foams and fluorine-free foams. Fluorinated foams contain PFAS, and fluorine-free foams do not. Of the fluorinated foams, aqueous film forming foams or “AFFF” are the foams that contain varying amounts and mixtures of PFAS.

Class B firefighting foams are commercial surfactant solutions that are utilized for fire suppression, fire training, and flammable vapor suppression at military installations, airports, petroleum refineries and bulk storage facilities, and chemical manufacturing plants and storage facilities. Additionally, local fire departments in communities have used and may maintain quantities of Class B firefighting foam in their inventories for use in training and emergency response.

According to an April 4, 2024, response from Ms. Jamie Long, City Clerk, no fire department records were available for the subject property. Therefore, Triterra encountered no records that indicate the use of class B firefighting foams on the subject property.

8.1.4 Biosolid Application

Biosolids are solid organic matter recovered from a wastewater sewage treatment process and used as fertilizer. Historically, biosolid type fertilizer has been applied to select agricultural fields. This material has been documented to potentially contain PFAS in higher rates than animal manure, or synthetic fertilizers. EGLE provides documentation of such applications within the MiEnviro website.

Triterra reviewed the MiEnviro website on April 8, 2024. No fields applied with biosolid type materials were identified on or adjoining the subject property.

8.2 Additional Non-scope services

Triterra conducted a limited visual asbestos containing materials (ACM) assessment during the subject property walkover. Suspect pipe wrap was observed in the basement of the subject property building. In Triterra’s opinion, the materials may contain asbestos but require sampling and laboratory analysis for confirmation. The potential for ACM in the building does not represent a suspect REC in connection with the subject property. However, Triterra recommends further assessment of the building materials at time of remodeling or demolition activities.



9.0 FINDINGS, OPINIONS, AND CONCLUSIONS

Triterra has performed a Phase I ESA in conformance with the scope and limitations of ASTM E 1527-21 for the parcel of land located at 137 N. Mill Street in St. Louis (City of St. Louis), Gratiot County, Michigan. Any exceptions to or deletions from this practice are described in Section 2.4 of this report.

The assessment has revealed the following RECs in connection with the subject property:

- **The potential for contamination on the subject property from historical laundry and printing operations (Section 5.1).** According to Triterra's review of available historical information, historical laundry operations occurred on the subject property between at least 1888 and 1893. The scope of laundry operations (ie, potential dry cleaning, chemical cleaning agents potentially used, historical waste disposal practices, etc) is unknown to Triterra. Therefore, the potential exists for hazardous substances and/or petroleum products used in association with historical laundry operations to have impacted the subsurface of the subject property. Additionally, historical printing operations occurred on the subject property between at least 1924 and 1948. Historical printing operations are known for the use of paints, inks and/or other hazardous substances, which may have been released and impacted the subsurface of the subject property.
- **The potential for an abandoned UST on the subject property (Section 5.1).** A gasoline UST was documented in the southwestern corner of the subject property on Sanborn maps in 1884. Triterra encountered no records regarding UST installation and removal dates, UST construction, capacity, etc. Therefore, the potential exists for the UST to have been abandoned-in-place on the subject property, and unknown and/or undocumented releases may have occurred and impacted the subsurface of the subject property. Thus, the potential for an abandoned UST on the subject property represents a REC in connection with the subject property.
- **The potential for migration of contamination onto the subject property from the nearby sites of concern (Sections 4.2 and 5.3).**
 - *215 W. Saginaw Street* adjoins the subject property to the west. According to Triterra's review of historical information, printing operations occurred onsite between at least 1884 and 1893. Historical printing operations are known for the use of paints, inks and/or other hazardous substances, which may have been released and impacted the subsurface. Based on proximity to the subject property, the potential exists for contamination to have migrated onto the subject property.
 - *220 W. Washington Avenue* is located approximately 159 feet southwest of the subject property. According to the results of subsurface investigations conducted onsite between 2018 and 2019 by Mannik Smith Group and/or AKT Peerless Environmental Services to assess historical gas station, auto repair, and oil warehouse operations, various VOCs, lead, and chromium were detected in shallow groundwater in exceedance of the EGLE Part 201 Residential GCC within 250 feet of the subject property. The plume of contamination is currently undefined. Additionally, area groundwater flow models indicate that groundwater flows north-northeast, toward the subject property. Potential exists for contamination to have migrated onto the subject property.
 - During Triterra's review of historical uses of adjoining sites, Triterra identified a historical gasoline UST located in the N. Mill Street right-of-way, approximately 60 to 70 feet southeast of the subject property (adjacent to 126 N. Mill Street) in Sanborn maps from at

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least 1924 to 1948. The UST contents, capacity, construction, installation and/or removal date(s) are unknown to Triterra. Unknown and/or undocumented releases may have occurred and impacted the subsurface. Based on proximity to the subject property (less than 100 feet), the potential exists for contamination to have migrated onto the subject property. Therefore, in Triterra's opinion, the historical gasoline UST in the right-of-way of N. Mill Street represents a REC in connection with the subject property.

Additionally, no Historical RECs (HRECs) or Controlled RECs (CRECs) were identified in connection with the subject property.

Triterra identified the following data failure associated with historical subject property use: the first developed uses of the subject property prior to 1884 could not be determined. Based on the historical uses of the subject property (commercial), it is Triterra's opinion that the data failure is not a significant data gap.

The following limitation was encountered during Triterra's subject property walkover: Triterra was unable to access the entirety of the subject property basement due to the structural integrity of the first floor of the building, a portion of which was collapsing into the basement. However, based on the known current and historical uses of the subject property and the RECs identified above, it is Triterra's opinion that the limitation did not impair Triterra's ability to identify RECs in connection with the subject property.

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10.0 AUTHOR & ENVIRONMENTAL PROFESSIONAL SIGNATURES

This Phase I ESA was prepared by Ms. Lillian Badillo (Environmental Scientist) and reviewed by Ms. Melissa Hunter (Associate Geologist | Director of Due Diligence) on behalf of Triterra. Please direct any questions to Triterra at (517) 702-0470 or visit our webpage at www.triterra.us.

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

A handwritten signature in blue ink, appearing to read "Lillian Badillo", written over a horizontal line.

Ms. Lillian Badillo
Environmental Scientist

A handwritten signature in blue ink, appearing to read "Melissa Hunter", written over a horizontal line.

Ms. Melissa Hunter
Associate Geologist | Director of Due Diligence

May 9, 2024

Date

