

Mr. John Simon  
General Supply Company  
P.O. Box 4719  
Easton, PA 18043

September 30, 2014

RE: Phase I Environmental Site Assessment Report  
Coplay General Supply Property  
Coplay Borough, Lehigh County, Pennsylvania

Dear Mr. Simon,

JMT Environmental Technologies, Inc., (JMT), is pleased to submit this Phase I Environmental Site Assessment for the above referenced property. The following information summarizes our findings.

#### **Executive Summary**

JMT was retained by John Simon of General Supply Company, current owner of the above referenced property, to conduct a Phase I Environmental Assessment of one tax parcel located on Bridge Street in the Borough of Coplay, Pennsylvania. JMT performed the Phase I Environmental Site Assessment (ESA) of tax parcel ID # 549956356371-001. The property is located on the southeast side of Bridge Street with its western property boundary being bordered by residential properties along North Front Street, herein known as the property, or site. The property is currently developed as a vacant commercial lumber yard property.

The purpose of this Phase I Environmental Assessment (ESA) is to assess current site conditions and render an opinion as to the presence of recognized environmental conditions (REC) at the property. JMT performed this Phase I in general conformance with the scope and limitations of the ASTM Practice E1527-13 and 40 CFR part 312. Any exceptions to or deletions from this practice are described in Section 7.0 Exceptions of this report. The following findings are potential REC's:

- 1) A small quantity of solid waste debris was observed in the wooded areas behind residential properties on the western boundary of the subject property. The litter consisted of demolished building materials, scrap metal, tires, auto parts, bottles, cans, yard waste, etc. The approximate cost to transport and dispose of this debris would be nominal. Therefore, this finding is not a REC.

- 2) A number of old paint cans, some spilled, were observed on the site. The approximate cost to package, transport and dispose of these materials would be nominal. The spilled paint appears to be on impervious surfaces. Because these items may be hazardous materials, they are a REC.
- 3) The use of PCBs in newly manufactured electrical equipment and oils has been banned since 1979. Transformers and fluorescent light ballasts are present which may contain capacitors that may be filled with PCB-contained dielectric fluid, and therefore are a potential REC.
- 4) Two 275-gallon aboveground storage tanks (AST) were observed. The AST's are reportedly used to store #2 heating oil for the onsite furnace. These AST's are in poor condition, with no secondary containment and are not installed within current code guidelines. Therefore, this AST system represent a REC.
- 5) A file review at the PADEP Northeast regional office revealed a previous underground storage tank system existed at the site. One 1,000 gallon unleaded gasoline tank was removed from the site in July of 1992. Nominal detection for TPH and BTEX compounds in soil were detected by Hydro-Analysis Associates of Kutztown, Pennsylvania. Hydro-Analysis Associates was found guilty in federal court for falsifying results of this kind. Therefore, the results contained within the report are to be deemed suspect. Therefore the potential existence of impacted soil from the tank system closure is a REC.

The undersigned declares that he meets the definition of Environmental Professional as stated in 40 CFR part 312 and that he has conducted the assessment in accordance with same. JMT appreciates the opportunity to be of service to you on this project. If you have any further questions, please contact me at your earliest convenience.

Respectfully Submitted,  
JMT ENVIRONMENTAL TECHNOLOGIES, INC.

*Thomas Martinelli*

Thomas Martinelli  
Senior Environmental Consultant

**PHASE I ENVIRONMENTAL ASSESSMENT REPORT**

**For:**

**COPLAY GENERAL SUPPLY PROPERTY  
1 BRIDGE STREET  
BOROUGH OF COPLAY  
LEHIGH COUNTY, PA 18037**

**Prepared for:**

**MR. JOHN SIMON  
GENERAL SUPPLY COMPANY  
P.O. BOX 4179  
EASTON, PENNSYLVANIA, 18043**

**Prepared by:**

**JMT ENVIRONMENTAL TECHNOLOGIES, INC.  
3353-C GUN CLUB ROAD  
NAZARETH, PA 18064**

**SEPTEMBER 2014**

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## EXECUTIVE SUMMARY

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The purpose of this Phase I Environmental Assessment (ESA) is to assess current site conditions and render an opinion as to the presence of recognized environmental conditions (REC) at the property. JMT performed this Phase I in general conformance with the scope and limitations of the ASTM Practice E1527-13 and 40 CFR part 312. Any exceptions to or deletions from this practice are described in Section 7.0 Exceptions of this report. The following findings are potential REC's:

- 1) A small quantity of solid waste debris was observed in the wooded areas behind residential properties on the western boundary of the subject property. The litter consisted of demolished building materials, scrap metal, tires, auto parts, bottles, cans, yard waste, etc. The approximate cost to transport and dispose of this debris would be nominal. Therefore, this finding is not a REC.
- 2) A number of old paint cans, some spilled, were observed on the site. The approximate cost to package, transport and dispose of these materials would be nominal. The spilled paint appears to be on impervious surfaces. Because these items may be hazardous materials, they are a REC.
- 3) The use of PCBs in newly manufactured electrical equipment and oils has been banned since 1979. Transformers and fluorescent light ballasts are present which may contain capacitors that may be filled with PCB-contained dielectric fluid, and therefore are a potential REC.

- 4) Two 275-gallon aboveground storage tanks (AST) were observed. The AST's are reportedly used to store #2 heating oil for the onsite furnace. Both of these AST's are in poor condition, with no secondary containment and are not installed within current code guidelines. Therefore, this AST system represent a REC.
- 5) A file review at the PADEP Northeast regional office revealed a previous underground storage tank system existed at the site. One 1,000 gallon unleaded gasoline tank was removed from the site. No current information regarding existing UST's at the site was available. The tank was removed by Wolff Petroleum Equipment Service, Inc. in July of 1992. The closure report was reviewed by JMT. A subsurface evaluation was performed in the former tank excavation in July of 1992 by Wolff. Nominal detection for TPH and BTEX compounds were detected. However, the soil samples collected during the closure process were sent to Hydro-Analysis Associates of Kutztown, Pennsylvania for analyses. Hydro-Analysis Associates was found guilty in federal court for falsifying results of this kind for a variety of clients. Therefore, the results contained within the report are to be deemed suspect. Therefore the potential existence of soil contamination from the tank system closure is a REC.

## **1.0 INTRODUCTION**

JMT Environmental Technologies, Inc. (JMT) was retained by John Simon, current owner of the site, ("user"), to prepare a Phase I Environmental Site Assessment of the subject property ("site") in general conformance with ASTM Standard E1527-13 and 40 CFR part 312. This report documents JMT's findings from our Phase I Investigation of the site. A site location map is found in Attachment III. The site currently consists of one tax parcel which is zoned industrial and currently comprises approximately 4.54 acres. The site is located at 1 Bridge Street, west of the Lehigh River and east of North Front Street in the Borough of Coplay. Residential, commercial and light industrial properties are located in nearby locales.

## **1.1 Project Purpose**

The purpose of this Phase I Environmental Site Assessment (ESA) is to determine whether there are “recognized environmental conditions” (REC) on the property, which may have an impact on the purchase, use or future sale of the site and liability of the user from a governmental or private party. The purpose of this assessment is to evaluate current environmental conditions. The prospective buyer will use the site as a storage yard. This ESA will therefore document current environmental conditions so party, user or buyer, will be able to establish their impact to the site, if any. Evidence for recognized environmental conditions were sought through environmental and historical records searches, interviews, and a site reconnaissance.

## **1.2 Project Scope**

This ESA is designed to generally conform to the American Society for Testing and Materials (ASTM) Practice E 1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process in terms of levels of inquiry, standard regulatory record search distances and site reconnaissance methodology.

The following issues were not evaluated within the scope of this Phase I ESA: 1) regulatory compliance or permitting of facility operations, 2) off-site waste disposal tracking, 3) integrity of on-site sewage disposal systems, 4) geotechnical/structural concerns with underlying soil or fill, 5) wetlands delineation, 6) the potential for naturally-occurring elements or their products that exceed applicable regulatory standards, 7) radon testing, 8) underground storage tank testing, 9) electromagnetic fields, 10) agricultural practices, 11) the potential for biological hazards. This list is not all inclusive.

Phase I ESA's do not generally include field or laboratory analyses of building materials, air, soil or water samples, which may yield additional information unforeseen in a Phase I ESA. JMT completed this study under the regulatory framework known to be in effect as of the date of this report; and the investigation, findings and conclusions as set forth are predicated upon those laws and regulations.

### **1.3 Project Limitations**

According to ASTM Practice E 1527-13, a Phase I ESA is intended to reduce, not necessarily eliminate, uncertainty regarding the potential environmental conditions in connection with the subject properties. The standard states that it recognizes “reasonable limits of time and cost” in this process. Consequently, assessments cannot be judged solely on whether they missed some existing contamination, but instead on “the reasonableness of the judgments made at the time and under the circumstances in which they were made.”

This report is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based on the facts currently available within the limit or scope of work, budget and schedule. The work described in this report was carried out in accordance with the Terms and Conditions in the contract.

In preparing this report, JMT may have relied on certain information provided by Environmental Data Resources (EDR), federal, state and local officials and other parties referenced therein, and on information contained in the files of state agencies, local agencies, or both, available to JMT at the time of this site assessment. Although there may have been some degree of overlap in the information provided by these various sources, JMT did not attempt to independently verify the accuracy or completeness of all the information reviewed or received during the course of this site assessment. Observations were made of the site and of the structures, if any, on the site as indicated in this report. Where access to portions of the site or to structures on the site was unavailable or limited, JMT renders no opinion as to the presence of indirect evidence relating to petroleum substance, hazardous substances, or both, in that portion of the site and structure. In addition, JMT renders no opinion as to the presence of indirect evidence relating to hazardous material or oil, where direct observation of the interior walls, floors, ceiling or a structure is obstructed by objects covering on or over these surfaces.

As part of this assessment, JMT has submitted requests for information via the Freedom of Information Act (FOIA) to various governmental agencies. Files were



present at the PADEP Northeast regional offices and were received by JMT on September 26, 2014.

#### **1.4 Project Terms and Conditions**

Terms as defined by ASTM E 1527-13 are used, as appropriate, in this report. ASTM defines recognized environment conditions as:

“the presence or likely presence of any hazardous substances or petroleum products in, on or at a property: (1) due to a release to the environment (2) under conditions indicative of a release to the environment or (3) under conditions indicative of a future material threat release to the environment”. The term is not intended to include de-minimus 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. Conditions determined to be de-minimus are not recognized environmental conditions.

Within the context of the ASTM standard, the “site” is the Coplay General Supply property and the “user” of this report is John Simon of General Supply Company.

## **2.0 SITE DESCRIPTION**

### **2.1 Location and Legal Description**

The subject property, tax parcel ID #549956356371-001 is described as approximately 4.54 acres of commercially developed lumber yard type property. The site is located at 1 Bridge Street, west of the Lehigh River and east of North Front Street in the Borough of Coplay, Lehigh County, Pennsylvania, herein known as the property, or site. A portion of the property lies directly underneath the bridge that connects Coplay and Northampton. Refer to site location, tax assessment and other maps in Attachment III for visual reference.

## **2.2 Environmental Setting**

The site is located in a mixed residential, commercial or light industrial setting. According to the EDR FEMA Flood Hazard Area Map, the site is not located in a flood plain. Due to the location of the Lehigh River to the east, a flood plain exists within 100 feet of the property. According to the EDR provided wetland map, no wetland areas are present on the site. According to the EDR provided information from the 1994 United States Geological Survey, the rock stratigraphic unit at the site is of the Ordovician system which was formed in the Paleozoic era. Metamorphic rock formation consists of a stratified sequence. Urban land is the primary soil type. Native soil types of the area are primarily the Washington series of silt or clay loams that are moderately well to well drained. The survey does not identify any depressions or sinkholes on the site. The elevation of the site is approximately 306 feet above mean sea level. The natural topography of the site generally slopes gently to the northwest.

## **2.3 General Site and Vicinity Characteristics**

The site is approximately 10% developed with building structures, 70% gravel or asphalt covered storage space and the remainder (20%) is wooded land. Located in the Borough of Coplay, the surrounding area was partially developed in early 1900's as primarily agricultural or residential in nature. Water and septic in the vicinity is provided by municipal sources. Municipal waste disposal in the vicinity is contracted. Electric is provided by PP & L. Telephone service is provided by a variety of suppliers. Both utilities are available at the street. The site consists of one irregularly shaped parcel consisting of 16,331 square feet or 4.54 acres.

## **2.4 On-site structures, Utilities and Improvements**

The parcel consists of one two-story wooden office/storage building, one two story pine shed, one general storage building, three lumber sheds and one small nail shed. The buildings were reportedly constructed around 1955. Concrete storage bins used to store landscape materials are also present. The gravel/asphalt covered areas are overgrown with vegetation and is used for storage of a variety of unsold building materials. Two storage trailers exist which were not accessible but are reportedly empty or contain stored building materials.

The office/storage building comprises approximately 3500 square feet on concrete slab at grade. The walls are either stick built or concrete block. Exterior wall construction is either suspect asbestos transite shingle or corrugated metal sheathing. The roof has wooden supports with corrugated metal panels. The building was used as offices to conduct business transactions, for employee usage and to store building materials, etc. The building has a forced hot air unit with a furnace fueled by #2 heating oil supplied by two above ground storage tanks. The nail shed is of wooden construction on slab at grade and was used to store nails.

The pine shed, lumber sheds and general storage building are for the most part open air structures with no utilities. They are constructed on concrete slab at grade or on concrete pilings or footers. Most are stick built or have metal beam construction. Roofs are either metal panels or shingled.

### **2.5 Current Site Usage and Adjoining Properties**

The site is currently vacant. No business has been transacted at the site for a number of years. The adjoining properties to the west are residential along north Front Street. Further west is residential property and light industrial or commercial properties. The adjoining properties to the east are a railroad track, walking path, wooded and the Lehigh River. Further east are residential or commercial properties in Northampton Borough. The adjoining property to the south is a former rail bridge extending over the Lehigh River and wooded. Wooded land and residences are further south. The adjoining property to the north is Bridge Street and further north are commercial and light industrial properties.

## **3.0 RECORDS REVIEW**

### **3.1 Site History & Ownership**

The property has reportedly been historically used as a commercial lumber yard since around the mid to late 1950's. A coal and rail yard existed prior to 1950. The property was reportedly wooded prior to its development. JMT performed a basic chain of title for the subject property at the Lehigh County Recorder of Deeds office. The chain of title revealed the following:

The current owner is General Supply Company of Easton, PA. They obtained the property from William Shafer on 5-12-1947 (Deed Book 694, page 467). Mr. Shafer obtained the property from Consolidated Rail Company on 5-1-1947 (Deed Book 152, page 107). Conrail obtained the property from R. Morris Gummere and Miles Eckert on 10-29-1898. The property was once part of a larger parcel which underwent numerous subdivisions prior to its sale to General Supply Company. See section 7.0 for chain of title limitations.

### **3.2 Federal and State Environmental Record Search**

A search of federal and state records was conducted according to ASTM standards by contracting a commercial database service, EDR, in order to identify any property within a designated proximity to the site that may pose a risk of contamination of the site. Definitions for some of those database sites were identified and are described along with each identified site in the following sections. See Attachment V for definitions and the database report. Full report is also found on enclosed CD.

#### **Federal ASTM Records**

The site was not mentioned as being classified as any of the federal database descriptions. The following are designated by the ASTM Standard as search databases with the number of sites identified in the search area:

<b>NPL</b>	<u>US EPA National Priorities List - 0</u>
<b>CERCLIS</b>	<u>US EPA Comprehensive Environmental Response, Compensation and Liability Act Information System - 0</u>
<b>RCRA CORRACTS</b>	<u>Facilities Subject to Corrective Action Under the Resource Conservation and Recovery Act -0</u>
<b>RCRA non-CORRACTS</b>	<u>Facilities Not Subject to Corrective Action Under the Resource Conservation and Recovery Act - 0</u>
<b>RCRA generators</b>	<u>Generators Under the Resources Conservation and Recovery Act -0</u>
<b>NRI</b>	<u>National Response Incidents - 0</u>

Based on proximity, and a cursory drive by, none of the federal mapped or unmapped sites would be expected to impact the subject property. The complete federal database search is found in Attachment V.

### **Pennsylvania Records**

No state hazardous waste sites, no unregulated tank cleanup sites, three LUST sites, no LAST sites and no Act 2 sites were identified within a designated proximity to the site according to ASTM standards. The target property is not listed as any type of site. Based on proximity, none of these types of state properties or unmapped properties would be expected to impact the site. JMT accessed the PADEP eFacts site which identifies facilities with environmental permits or violations. The eFacts site revealed no permits or violations have been filed for the site.

**Note: Please refer to Attachment V and the attached CD for complete records searched.**

### **3.3 Local Environmental Record Search**

A formal request for a file review was submitted to the PADEP Northeast Regional Office. The file review request revealed underground storage tank files present. The file was received by JMT on September 26, 2014. The file contained the following documents:

PADER Registration of Storage Tanks Form – dated 11-15-89 initially registering a 1,000 gallon gasoline tank. Install date not available to determine if leaded gasoline was ever stored.

Closure/Change in Service Notification Form - dated 6-9-92 notifying PADER of the impending tank removal. PADER Standard UST removal letter attached.

UST Closure Report – prepared by Wolff Petroleum Equipment Service, Inc. dated 8-27-92. UST removed with no observable contamination. Sample analyses performed by Hydro-Analysis Associates. Lead (Pb) not analyzed. Nominal BTEX and TPH compounds detected.

PADER Correspondence – dated 10-2-92, 1-12-94 and 1-14-94 indicating closure report, registration and sample analysis deficiencies.

The Borough of Coplay Right to Know Officer, Sandra A. Gyecsek, was contacted to perform a right to know request for pertinent files available for the site. The response indicated no pertinent files were available for review. Her response is found in Attachment IV.

### **3.4 Other Environmental Record Sources**

JMT conducted a review of the geological maps, land use and zoning plans at the Lehigh County Planning Commission office. The site is zoned industrial and the land use is industrial. The geology is as stated in section 2.2. JMT has performed a City Directory search through EDR. This search identifies business names at specific addresses for historic phone directory listings. Coplay General Supply was identified at 1 Bridge Street in 2008, 2003, 1999, 1995, 1989, 1984, 1979, 1974, 1969 and 1964. The Lehigh Valley Railroad Company is also listed for 1964. The report is found in Attachment IV.

### **3.5 Available Historic Maps**

JMT conducted a Sanborn Fire Insurance Map search through the EDR Sanborn Company in Southport, CT. The search conducted revealed that maps were produced for the subject area in for the years 1908, 1913, 1948 and 1959. None of the maps indicate the presence of recognized environmental conditions. The map search is found in Attachment IV. A summary is as follows:

The 1908 map reveals that there are structures in the vicinity of the property boundaries. No site specific information is observed.

The 1913 and 1948 maps revealed that the site is used as a coal storage yard. The site is listed as a vacant Lehigh Valley Railroad property.

The 1959 map indicates the office/storage and nail shed buildings exist. The site is still listed as a coal storage yard and a vacant Lehigh Valley Railroad property.

### **3.6 Aerial Photograph Review**

Historic aerial photographs for the years 1938, 1958, 1971, 1992, 1999, 2003, 2005 and 2012 were reviewed of the subject area. These aerials were reviewed at varying scales. Copies are found in Attachment VI. The aerials were reviewed to obtain historic site use information, as follows:

- The 1938 aerial was obtained from the Penn Pilot aerial photography website. The aerial revealed that there are a number of buildings on site that do not exist today. There appears to be active railroad terminal activities at the site. A rail siding exists on the site which extends west from the main railroad. The usage and construction characteristics of these buildings are not known. A number of paths, land clearances or disturbances and storage piles are present in the current wooded portion of the site. This indicates some type of commercial or industrial usage was performed. The surrounding property is primarily wooded or residential.
- The 1958 and 1971 aerials were obtained from the Penn Pilot aerial photography website. These aerials indicate the lumber yard buildings, for the most part, exist. Lumber yard operations appear to be active. Exterior storage of items is present. The railroad to the east appears to be active. The siding on the site is not evident. The now current wooded portion of the site is less active and more vegetative growth is observed.
- The 1991 and 1999 aerials were obtained from the Google Earth website. The subject property and surrounding areas remain essentially unchanged from the 1974 photo.
- The 2003 aerial was obtained from the Google Earth website. This subject property appears to be an active lumber yard. Material is stored outside. New roofs appeared to be installed on some buildings.
- The 2012 aerial was obtained from the Google Earth website and depicts the property as it is today.

## **4.0 SITE RECONNAISSANCE**

On September 17, 2014, JMT's Senior Environmental Consultant, Thomas Martinelli performed site reconnaissance at the subject property. The current owner, Mr. John Simon, provided access and limited historical information concerning the property. Mr. Robert Mann, General Supply Company property manager accompanied JMT on the site. Remarkable observations as a result of the reconnaissance are discussed in the following sections of the report.

### **4.1 Exterior Observations**

The property exhibits the characteristics described in section 2.3 & 2.4. The subject property consists of building space, vacant storage area and wooded property. The storage area of the site is almost entirely surrounded by a chain link fence. Various unsold building materials, i.e., lumber, siding, fasteners, etc. were observed. A number of concrete slabs are located in the gravel/asphalt storage areas that resemble former building slabs. A stormwater catch basin is also found in this area. Stormwater generally flows off the building roofs/drains and percolate into site soils. A railroad track is located outside of the western fence line. A number of paint cans, some spilled, were observed in the storage areas. A pallet of de-icer (calcium chloride?) was observed in the southeast corner of the storage area. A number of bags of lime, some spilled, were observed in the center lumber shed. A site location map is provided in Attachment III. Site photographs are found in Attachment II.

A large steel trough was located along the walking path in the wooded portion of the site. This trough was placed upside down, appeared to be hollow and empty. Evidence of intermittent surface water is identified on the site as drainage swales and culverts exist in the wooded area. A number of walking trails exist in this area. A municipal storm water access hatch is located near the former rail bridge. Suspect wetland environments were not observed. FEMA floodplain zones are not found. Small quantities of solid waste, i.e. auto parts, yard waste, scrap metal, bottles, cans, rubber tires, etc. was located in the wooded areas and along the



western property boundary of the site. The waste appeared to be surficial in nature and wasn't excavated or buried.

### **Storage Tanks**

Two 275-gallon above ground storage tanks were observed on the western side of the office/storage building. These tanks reportedly were used to store #2 heating oil for the forced hot air furnace. The tanks are partially installed underground and the bottom of the tanks cannot be observed to determine their condition. No evidence of underground storage tanks, i.e. fill and/or vent pipes were observed.

### **Indicators Not Observed**

The following indicators of possible recognized environmental conditions under the ASTM standard were not observed at the site during the exterior site reconnaissance: pits, material storage ponds or lagoons and stressed vegetation.

### **4.2 Interior Observations**

The buildings consists of storage areas and office space. Floors are concrete slab at grade or soil. No floor drains were observed in the storage or shed areas. Potential hazardous substances (paint cans) in small containers were observed. Potentially PCB containing fluorescent light ballasts were observed in some buildings.

### **4.3 Non-ASTM Observations**

#### **4.3.1 Lead-Based Paint**

Lead-based paint was not physically evaluated as part of this ESA.

#### **4.3.2 Asbestos-Containing Material (ACM)**

ACM was not physically evaluated as part of this ESA.

#### **4.3.3 Radon**

Radon was not physically evaluated as part of this ESA.

## 5.0 INTERVIEW INFORMATION

Mr. John Simon, (current President of General Supply Company), stated he has been the president of the company since 1996 and been employed by the company in a management position since 1983. He stated he used the site as a lumber yard and building materials retail and distribution center since his employment. He stated that to the best of his knowledge he knew of no other usage at the site. He was not aware of any significant hazardous materials releases or spill events during his ownership of the site. He was not aware of any UST's at the site. He stated no hazardous waste was generated at the site. A user questionnaire is found in Attachment I.

Mr. Robert Mann, (Property Manager of General Supply Company), stated General Supply Company used the site as a lumber yard and building materials retail and distribution center since his employment. He also was not aware of any significant hazardous materials releases or spill events during his ownership of the site. He was not aware of any UST's at the site. He stated no hazardous waste was generated at the site. He stated that the trailers at the site are either empty or contain unsold building materials.

Ms. Kathy Hahn, (Treasurer of General Supply Company), stated General Supply Company used the site as a lumber yard and building materials retail and distribution center since her employment. She also was not aware of any significant hazardous materials releases or spill events during his ownership of the site. She was aware of the former 1,000 gallon UST at the site. She had not further information about the UST system.

Mr. Matt Buskaritz, Fire Chief, Coplay Volunteer Fire Department, stated he was not aware of any emergency responses, fires, environmental concerns or discharges at the site.

Ms. Marianne T. Mann, Borough of Coplay Office Clerk, Ms. Marianne T. Mann, was contacted to obtain historical information regarding the subject property. Ms. Mann stated that she was at the position only a few months and did not really have any historical knowledge of the area or site. JMT requested an interview with other persons in the borough office who may know previous site usage at the site. Ms. Mann replied via email that no person was available for interview. Borough correspondence is found in Attachment IV.

## **6.0 FINDINGS, OPINIONS AND CONCLUSIONS**

### **6.1 Findings**

The findings identified in this section are those facts uncovered during the environmental assessment process that JMT believes may be significant to the user in association with this transaction and are as follows:

1. A small quantity of solid waste debris was observed located in the wooded areas behind residential properties on the western boundary of the subject property. The litter consisted of demolished building materials, scrap metal, tires, auto parts, bottles, cans, yard waste, etc.
2. A number of old paint cans, some spilled, were observed on the site. The approximate cost to package, transport and dispose of these materials would be nominal. The spilled paint appears to be on impervious surfaces.
3. The use of PCBs in newly manufactured electrical equipment and oils has been banned since 1979. Transformers and fluorescent light ballasts are present which may contain capacitors that may be filled with PCB-contained dielectric fluid.
4. Two 275-gallon aboveground storage tanks (AST) were observed. The AST's are reportedly used to store #2 heating oil for the onsite furnace. Both of these AST's are in poor condition, with no secondary containment and are not installed within current code guidelines.
5. A file review at the PADEP Northeast regional office revealed a previous underground storage tank system existed at the site. One 1,000 gallon unleaded gasoline tank was removed from the site in July of 1992.

### **6.2 Opinions**

1. Since the debris/waste does not appear to be a hazardous material or waste, and not a petroleum product, the areas where the waste is deposited would not be a REC.

2. Because these paint cans may be hazardous materials, they are a REC.
3. Because these items were not observed to be leaking, or a material threat for future leakage, and are a de minimus concern, they are not a REC.
4. Since the bottom of the AST's could not be observed due to them being partially underground, no statement can be made regarding their integrity, and are therefore a REC.
5. No current information regarding existing UST's at the site was available. The tank was removed by Wolff Petroleum Equipment Service, Inc. in July of 1992. The closure report was reviewed by JMT. A subsurface evaluation was performed in the former tank excavation in July of 1992 by Wolff. Nominal detection for TPHC and BTEX compounds were detected. However, the soil samples collected during the closure process were sent to Hydro-Analysis Associates of Kutztown, Pennsylvania for analyses. Hydro-Analysis Associates was found guilty in federal court for falsifying results of this kind for a variety of clients. Therefore, the results contained within the report are to be deemed suspect. Therefore the potential existence of soil contamination from the tank system closure is a REC.

### **6.3 Conclusions**

JMT Environmental Technologies, Inc. has performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM Practice E1527-13 of the Coplay General Supply site, tax parcel ID# 549956356371-001, Borough of Coplay, Lehigh County, PA. Any exceptions to or deletions from this practice are described in Section 7.0, Exceptions Summary of this report. This assessment has revealed evidence of the following recognized environmental condition in connection with the property:

1. Although this waste material is not a REC, the material should be removed and properly disposed at some time in the future.
2. Since the presence of paint cans, some spilled, exists throughout the facility, this REC should be addressed. The paint cans should be

properly packaged and disposed of in accordance with applicable regulations. The one spilled paint can was observed to be spilled on an impervious surface, and therefore is a de minimus condition, and would not require remediation.

3. The transformer and light ballasts are not a REC. However, if future renovation or demolition of these areas is performed, these items should be properly packaged and disposed.
4. The AST's should be properly drained and removed to determine their integrity and observe soils beneath each AST. If leakage is observed, appropriate remedial action would be required.
5. Since the UST was removed and some compounds were detected in the soil, some type of release did occur. The fact that the sample analysis may not have been performed within required holding times and the legal issues associated with Hydro-Analysis Associates, the tank excavation area should be investigated to determine if subsurface contamination exists.

## **7.0 EXCEPTIONS/DATA GAPS**

<b>Section Ref.</b>	<b>Explanation</b>
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3.1	During the search the chain of title was very complex with various subdivisions, rights of way, easements, etc. present. A complete, thorough chain of title could not be reasonably obtained within the budgetary constraints of this project. If a thorough chain of title is required, an abstract company should be retained. Also, data gaps are present which determine exact site usage of the site for every year dating back since the site was developed.
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4.2	Portions of the interior of the buildings were not observable due to stored items and/or inaccessible.
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3.6	Data gaps may remain in the search of aerial photographs and documented historic site usage.
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## **8.0 NON-ASTM ISSUES**

### **Radon**

The EPA has established 4 picocuries per liter ("pCi/L") of radon gas in indoor air as a guidance level for residences. Accumulations above 4 pCi/L are considered to represent a health risk to occupants. The Lehigh Valley is known to lie within an area that has elevated radon levels. The EDR Report has identified 58% of the structures tested in the 18037 zip code area as being above the EPA level. Actual radon concentration can only be determined by actual on-site measurement. Radon was not evaluated as part of this EA. The possible presence of naturally occurring radon is a non-scope issue, as it is not included in CERCLA's definition of hazardous substances and does not otherwise present potential CERCLA liability. However, radon can become a liability in residential properties if radon mitigation systems are not engineered into construction specifications.

### **Asbestos**

The issue of asbestos is outside the scope of the Phase I ESA standard practice; however it would be expected to be a potential business risk for this property due to the construction date of before 1980. Effective October 11, 1994, the Occupational Safety and Health Administration ("OSHA") expanded the scope of its general industry standard for asbestos, 29 CFR 1910.1001. The standard now applies to virtually all buildings constructed before 1980 and brings OSHA's enforcement power to an issue which was previously regulated by the EPA's National Emission Standards for Hazardous air Pollutants ("NESHAPS"). Due to the age of the buildings on site, suspect asbestos materials are located within the office/storage building.

### **Lead Based Paint**

Lead-based paint was not evaluated as part of this EA. Since the buildings on the site were constructed before 1978, lead paint may be expected to be a business issue at these buildings. The possible presence of lead-containing paint is a non-scope issue, as lead containing paint is not included in CERCLA's definition of hazardous substances and does not otherwise present potential CERCLA liability. Due to the age of the buildings on site, suspect lead based paint may be located within the buildings.

**ATTACHMENT I**

**Phase I User Questionnaire**

**ATTACHMENT II**

**Site Photographs**



**ATTACHMENT III**

**Site Maps/Figures**

**ATTACHMENT IV**

**Historic Search Information**

**ATTACHMENT V**

**Regulatory Database Report**

**ATTACHMENT VI**

**Aerial Photographs**

**ATTACHMENT VII**

**Tax Assessment Information**