

# PHASE I ENVIRONMENTAL SITE ASSESSMENT

COMMERCIAL PROPERTY  
3443 BENNING ROAD NE  
WASHINGTON, DC 20019

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June 3, 2015

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COMMERCIAL PROPERTY  
3443 Benning Road NE Washington, DC 20019

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*Prepared for:*

The Neighborhood Development Company, LLC  
3232 Georgia Avenue, NW  
Washington, DC 20010

*Prepared by:*

ICOR, Ltd.  
P.O. Box 406  
Middleburg, Virginia 20118  
(703) 257-1225

ICOR Project No. 15NDC05

**June 3, 2015**

# PROJECT SUMMARY

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**Commercial Property  
3443 Benning Road NE, Washington, DC**

FINDINGS, CONCLUSIONS AND RECOMMENDATIONS SUMMARY						
Report Section	Further Investigation (Yes/No)?	De Minimis Condition	Recognized Environmental Condition (REC)	Historical REC	ASTM Non-Scope Condition	Recommendation
Significant Data Gap	No					
User Questionnaire	No					
Current Use of the Site	No					
Current Uses of Adjoining Properties	No					
Regulatory Records	No	Past uses of two nearby sites have the potential to have impacted the Property				Proper identification and disposal of impacted materials if found
Interviews	No					
Historical Use	No					
Chemical Uses	No					
Waste Generation, Storage and Disposal	No					
Storage Tanks	No					
Polychlorinated Biphenyls	No					
Solid Waste Disposal	No	Minor dumping in unfenced areas				Removal of the dumped items
Other Areas of Concern	No					
Lead in Drinking Water	No					
Radon	No					

## EXECUTIVE SUMMARY

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ICOR LTD (ICOR) was retained by The Neighborhood Development Company, LLC to conduct a Phase I ESA in conformance with our proposal and the scope and limitations of ASTM Standard Practice E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) for the property located at 3443 Benning Road NE in the City of Washington, DC. Any exceptions to, or deletions from, this practice are described in Sections 1.4, 1.5 and 1.6 of this report.

### PROPERTY DESCRIPTION

The Property, which consists of five non-contiguous unimproved lots, is located on the south side of Benning Road in a commercial/residential area of Northeast, Washington, DC. The Property consists of Assessor Parcel Numbers - Square 5017 and lots 0836, 0839, 0840, 0841, and 0842. The property totals approximately 25,476 square feet of land and is not improved with any permanent structures except for a small concrete block structure on the northwestern portion (fronting Benning Road). The western parking lot fronting Benning Road is fenced or surrounding by buildings and is not currently being used. There are four parcels located along Eads Street, NE to the south that are bordered by an unnamed alley to the north and Eads Street to the south. The Eads Street parcels are mostly fenced, with gravel or paved surfaces.

The Property was not identified on any regulatory databases searched for this ESA.

During the site reconnaissance, no storage of hazardous materials was observed on the Property. However, ICOR was not granted access to the fenced lot fronting Benning Road, in which a small concrete block structure was present.

One small shed was present at the northwestern portion of Lot 0842 along Eads Street and a small concrete block structure was present abutting the adjacent retail building to the west in the northern parking lot. Due to a lack of access inside the Property fencing, these structures were not accessed for the ESA. ICOR made several attempts to access the property and to interview the current site owner. In the end, ICOR was not given access or interview. As such, the past and current uses of the small concrete block structure were not determined. Icor was told that the small shed held cones and other items utilized by the parking attendant. Although the uses are not expected to be of environmental concern, this is considered a limiting condition and data failure for this ESA.

Based on a review of reasonably ascertainable information, no significant non-compliance issues which would arise from conditions as result of a release or impacts to the subsurface at the Property were identified during the course of this assessment.

Based on a review of historical sources, the northern parking lot on the Property was utilized for parking with no past structures except for the small concrete block structure that abuts the adjacent retail building. The Eads Street parcels were once part of the northern paved parking lots with no prior uses (beyond vehicle parking) or structures. ICOR did not identify evidence of data failure during the course of this assessment.

The immediately surrounding properties consist of the following:

Direction from Site	Tenant/Use (Address)	Regulatory Database Listing(s)
North	Benning Road followed by Metro elevated tracks and a PEPCO Benning Road Service Center (3400 Benning Road)	RCRA LQG, DC UST, NY Manifest, PA Manifest, NJ Manifest
East	A liquor store at 3445 Benning Road and an associated parking lot and a fenced vacant lot along Eads Street	None
northeast	A vacant former restaurant, auto repair facility, and gas station at 3451 and 3465 Benning Road	DC Hist UST, EDR US Hist Auto Station
South	Residential row homes located along Eads Street	None Identified
West	Commercial building with several restaurants, medical, and retail uses (3421-3439 Benning Road) and residential row homes along Eads Street.	EDR Hist Cleaners

Based upon topographic map interpretation, the direction of groundwater flow beneath the Property is inferred to be to the west and north. Based on a review of local geologic information, groundwater is presumed to be present at an estimated depth of more than six feet bgs.

No monitoring wells were observed on readily accessible areas of the Property or on readily accessible areas of adjacent properties, which were viewed from the closest public right-of-ways during ICOR's site reconnaissance. Due to parked vehicles and/or other obstacles, isolated areas of the Property and adjoining properties were not accessible for direct observation during ICOR's reconnaissance.

## FINDINGS

Recognized Environmental Condition (REC) is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. ICOR's assessment has revealed the following RECs associated with the Property or nearby properties:

- ICOR did not identify evidence of on-site RECs during the course of this assessment.

Controlled Recognized Environmental Condition (CREC) is defined by the ASTM Standard Practice E1527-13 as a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. ICOR's assessment has revealed the following CRECs associated with the Property or nearby properties:

- ICOR did not identify evidence of on-site CRECs during the course of this assessment.

Historical Recognized Environmental Condition (HREC) is defined by the ASTM Standard Practice E1527-13 as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory

authority, without subjecting the property to any required controls. ICOR's assessment has revealed the following HRECs associated with the Property or nearby properties:

- ICOR did not identify evidence of on-site HRECs during the course of this assessment.

De Minimis Conditions are defined by ASTM as environmental conditions that "generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

- Minor dumping of typical household and food trash was observed on the two unfenced portions of the Property. No chemical wastes or drums were observed in these areas.
- Historical records researched showed that the surrounding area was primarily retail or residential except for a dry cleaners 3427-3429 Benning Road located approximately 110 feet to the west and downgradient from the Property (between 1943 and 1983), and a gas station and auto repair facility that was located adjacent and cross to slightly upgradient to the northeast from at least 1954 to 1960 (3451 and 3465 Benning Road). The listings at 3451 and 3465 Benning Road were very limited and, based on a review of other historical documents, it is likely that such uses were conducted on site for a longer period of time. According to the EDR report this unknown former gas station and auto repair facility had registered tanks, but the current status of those tanks is unknown. No reported releases were identified for the facility tanks. This facility is located cross to slightly upgradient to the Property. However, this area slopes down to the north, northwest, which is away from the Property. Based upon the distance and the relative cross to upgradient topographic slope, the site is not expected to represent a significant environmental concern. The former buildings and uses, as well as the unknown status of the tanks at the site remain a potential concern. Due to the lack of potential current or past uses of the Property involving petroleum products or dry cleaning solvents, the owner of the Property would not be considered responsible for any cleanup required if off-site impacts to the Property are found in the future.

## **CONCLUSIONS, OPINIONS AND RECOMMENDATIONS**

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard Practice E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) of 3443 Benning Road NE in the City of Washington, Prince William County, DC, the *Property*. Any exceptions to, or deletions from, this practice are described in Sections 1.4, 1.5 and 1.6 of this report.

ICOR did not identify evidence of RECs in connection with the subject property during the course of this assessment. ICOR recommends no further investigation for the subject property at this time. However, the following recommendations are provided:

- Routine removal of the food waste and household trash in the unfenced areas is recommended.
- A former dry cleaners was present approximately 110-feet to the west and downgradient from the Property and a former gas station, auto repair facility, and used car lot was present to the northeast and cross to slightly upgradient from the Property. No releases have been reported for these two former sites. However, the status of the former gas station tanks is

unknown. Due to the lack of potential current or past uses of the Property involving petroleum products or dry cleaning solvents, the owner of the Property would not be considered responsible for any cleanup required if off-site impacts to the Property are found in the future.

- Should access be granted to the storage shed and small concrete block structure and evidence of past or current environmental concern are identified, ICOR will generate an addendum to this report with altered conclusions and recommendations.

# TABLE OF CONTENTS

<b>1.0 INTRODUCTION .....</b>	<b>1</b>
1.1 Scope of Work.....	1
1.2 Additional Services.....	1
1.3 Significant Assumptions.....	1
1.4 Limitations .....	2
1.5 Limiting Conditions/Deviations .....	3
1.6 Data Gaps and Data Failure .....	3
1.7 Reliance.....	3
<b>2.0 SITE AND VICINITY DESCRIPTION.....</b>	<b>5</b>
2.1 Site Location and Description .....	5
2.2 Site and Vicinity Characteristics .....	6
2.3 Physical Setting .....	6
<b>3.0 HISTORICAL REVIEW OF SITE AND VICINITY.....</b>	<b>8</b>
3.1 Historical Summary .....	8
3.2 Aerial Photograph Review .....	8
3.3 Sanborn Fire Insurance Maps.....	10
3.4 City Directories .....	10
3.5 Historical Topographic Maps .....	11
3.6 Chain of Title.....	12
<b>4.0 REGULATORY AGENCY RECORDS REVIEW .....</b>	<b>13</b>
4.1 Regulatory Agencies.....	13
<b>5.0 REGULATORY DATABASE RECORDS REVIEW.....</b>	<b>15</b>
5.1 Records Summary.....	15
5.2 Vapor Migration.....	18
<b>6.0 INTERVIEWS AND USER PROVIDED INFORMATION .....</b>	<b>19</b>
6.1 Interviews.....	19
6.2 User Provided Information.....	19
6.3 Previous Reports and Other Provided Documentation.....	19
<b>7.0 SITE RECONNAISSANCE.....</b>	<b>20</b>
7.1 Property Reconnaissance Findings.....	20
7.2 Adjacent Property Reconnaissance Findings .....	21
<b>8.0 OTHER ENVIRONMENTAL CONSIDERATIONS.....</b>	<b>23</b>
8.1 Radon.....	23
8.2 Drinking Water Sources and Lead in Drinking Water .....	23
<b>9.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS .....</b>	<b>24</b>
<b>10.0 REFERENCES .....</b>	<b>25</b>

## FIGURES

- 1 TOPOGRAPHIC MAP
- 2 SITE MAP



## **APPENDICES**

- A** PROPERTY PHOTOGRAPHS
- B** REGULATORY DATABASE
- C** HISTORICAL SOURCES
- D** REGULATORY AGENCY RECORDS
- E** OTHER SUPPORTING DOCUMENTATION
- F** QUALIFICATIONS

## **1.0 INTRODUCTION**

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This report documents the methods and findings of the Phase I ESA performed in conformance with the proposal and scope and limitations of ASTM Standard Practice E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) for the property located at 3443 Benning Road NE in the City of Washington, DC (Figure 1: Topographic Map, Figure 2: Site Map, and Appendix A: Property Photographs).

### **1.1 SCOPE OF WORK**

The purpose of the Phase I ESA is to assist the client in identifying potential RECs, in accordance with ASTM E1527-13, associated with the presence of any hazardous substances or petroleum products, their use, storage, and disposal at and in the vicinity of the Property. Property assessment activities focused on: 1) a review of federal, state, tribal and local databases that identify and describe underground fuel tank sites, leaking underground fuel tank sites, hazardous waste generation sites, and hazardous waste storage and disposal facility sites within the ASTM approximate minimum search distance; 2) a property and surrounding site reconnaissance, and interviews with the past and present owners and current occupants and operators to identify potential environmental contamination; and 3) a review of historical sources to help ascertain previous land use at the site and in the surrounding area.

### **1.2 ADDITIONAL SERVICES**

Other environmental considerations such as ACMs, LBP, lead in drinking water, radon, mold, and wetlands can result in business environmental risks for property owners which may disrupt current or planned operations or cash flow and are generally beyond the scope of a Phase I assessment as defined by ASTM E1527-13. Based upon the agreed-on scope of services this ESA did not include subsurface or other invasive assessments, business environmental risks, or other services not specifically identified and discussed herein.

### **1.3 SIGNIFICANT ASSUMPTIONS**

The following assumptions are made by ICOR in this report. ICOR relied on information derived from secondary sources including governmental agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, and personal interviews. ICOR has reviewed and evaluated the thoroughness and reliability of the information derived from secondary sources including government agencies, the client, designated representatives of the client, property contact, property owner, property owner representatives, computer databases, or personal interviews. It appears that all information obtained from outside sources and reviewed for this assessment is thorough and reliable. However, ICOR cannot guarantee the thoroughness or reliability of this information.

Groundwater flow, unless otherwise specified by on-site well data or well data from the Property or nearby sites, is inferred from contour information depicted on the USGS topographic maps. ICOR assumes the property has been correctly and accurately identified by the client, designated representative of the client, property contact, property owner, and property owner's representatives.

## 1.4 LIMITATIONS

Property conditions, as well as local, state, tribal and federal regulations can change significantly over time. Therefore, the recommendations and conclusions presented as a result of this assessment apply strictly to the environmental regulations and property conditions existing at the time the assessment was performed. Available information has been analyzed using currently accepted assessment techniques and it is believed that the inferences made are reasonably representative of the property. ICOR makes no warranty, expressed or implied, except that the services have been performed in accordance with generally accepted environmental property assessment practices applicable at the time and location of the assessment.

Considerations identified by ASTM as beyond the scope of a Phase I ESA that may affect business environmental risk at a given property include the following: ACMs, radon, LBP, lead in drinking water, wetlands, regulatory compliance, cultural and historical resources, industrial hygiene, health and safety, ecological resources, endangered species, indoor air quality, mold, and high voltage lines. These environmental issues or conditions may warrant assessment based on the type of the property transaction; however, they are considered non-scope issues under ASTM Standard Practice E1527-13.

If requested by the client, these non-scope issues are discussed herein. Otherwise, the purpose of this assessment is solely to satisfy one of the requirements for qualification of the innocent landowner defense, contiguous property owner or bona fide prospective purchaser under CERCLA. ASTM Standard Practice E1527-13 and the United States EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312) constitute the "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined in:

- 1) 42 U.S.C. § 9601(35)(B), referenced in the ASTM Standard Practice E1527-13.
- 2) Sections 101(35)(B) (ii) and (iii) of CERCLA and referenced in the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312).
- 3) 42 U.S.C. § 9601(40) and 42 U.S.C. § 9607(q).

The Phase I ESA is not, and should not be construed as, a warranty or guarantee about the presence or absence of environmental contaminants that may affect the property. Neither is the assessment intended to assure clear title to the property in question. The sole purpose of assessment into property title records is to ascertain a historical basis of prior land use. All findings, conclusions, and recommendations stated in this report are based upon facts, circumstances, and industry-accepted procedures for such services as they existed at the time this report was prepared (i.e., federal, state, and local laws, rules, regulations, market conditions, economic conditions, political climate, and other applicable matters). All findings, conclusions, and recommendations stated in this report are based on the data and information provided, and observations and conditions that existed on the date and time of the property reconnaissance.

Responses received from local, state, or federal agencies or other secondary sources of information after the issuance of this report may change certain facts, findings, conclusions, or circumstances to the report. A change in any fact, circumstance, or industry-accepted

procedure upon which this report was based may adversely affect the findings, conclusions, and recommendations expressed in this report.

## **1.5 LIMITING CONDITIONS/DEVIATIONS**

The performance of this Phase I ESA was limited by the following conditions:

- The majority of the Property areas were enclosed within locked fences and could not be physically accessed. The Property areas were viewed from the exterior of the fenced areas.
- One small shed was present at the northwestern portion of Lot 0842 along Eads Street and a small concrete block structure was present abutting the adjacent retail building to the west in the northern parking lot. Due to a lack of access inside the Property fencing, these structures were not accessed for the ESA. ICOR made several attempts to access the property and to interview the current site owner. In the end, ICOR was not given access or interview. The small shed was reportedly used by parking attendants and was not used to store any hazardous chemicals or gasoline. The past and current uses of the small concrete block structure were not determined. Although the uses are not expected to be of environmental concern, this is considered a limiting condition for this ESA.

## **1.6 DATA GAPS AND DATA FAILURE**

According to ASTM E1527-13, data gaps occur when the Environmental Professional is unable to obtain information required by the Standard, despite good faith efforts to gather such information. Pursuant to ASTM E1527-13, only significant data gaps, defined as those that affect the ability of the Environmental Professional to identify RECs, need to be documented.

Data failure is one type of data gap. According to ASTM E1527-13, data failure occurs when all of the standard historical sources that are reasonably ascertainable and likely to be useful have been reviewed and yet the objectives have not been met. Pursuant to ASTM E1527-13, historical sources are required to document property use back to the property's first developed use or back to 1940, whichever is earlier, or periods of five years or greater.

### **1.6.1 DATA FAILURE**

Except for the lack of access to the two small structures on the Property and contact with the current owner for an interview, AEI did not identify significant data failure which affected our ability to identify RECs. None of the historical documents reviewed or interviews with others connected to the Property indicated that any potential environmental concerns should be found by accessing the two small structures. However, the lack of access and use information is considered a data failure.

### **1.6.2 DATA GAPS**

ICOR did not identify evidence of data gaps during the course of this assessment.

## **1.7 RELIANCE**

All reports, both verbal and written, are for the benefit of Christina Archambeault. This report has no other purpose and may not be relied upon by any other person or entity without the written consent of ICOR. Either verbally or in writing, third parties may come into possession of this report or all or part of the information generated as a result of this work. In the absence of

a written agreement with ICOR granting such rights, no third parties shall have rights of recourse or recovery whatsoever under any course of action against ICOR, its officers, employees, vendors, successors or assigns. Reliance is provided in accordance with ICOR's Standard Terms and Conditions. The limitation of liability defined in the Terms and Conditions is the aggregate limit of ICOR's liability to the client and all relying parties.

## 2.0 SITE AND VICINITY DESCRIPTION

### 2.1 SITE LOCATION AND DESCRIPTION

PROPERTY INFORMATION	
Property Name	Commercial Property
Street Addresses	3443 Benning Road NE
City	Washington
State	DC
Location	Approximately 215 feet west of the intersection of Benning Road and 36 <sup>th</sup> Street NE
Vicinity Characteristics	Commercial and residential uses
Approximate Site Acreage/Source	0.58/DC Atlas web site
Property Type	Vacant land
Property Use	Paved parking and gravel lots
Assessor Parcel Numbers	Square 5017, Lots 0836, 0839, 0840, 0841, and 0842
SITE AND BUILDING INFORMATION	
Number of Buildings	One small concrete block structure abutting the adjacent night club property to the west along Benning Road.
Years of Construction	N/A
Number of Floors/Stories	N/A
Basement or Subgrade Areas	None identified
Number of Units	N/A
Building Area (SF)/Source	N/A
Building Description	N/A
Building Occupants	N/A
Additional Improvements	Asphalt paved lots and a small gravel area. There is a small shed present at the northwestern portion of the Eads Street parcels
Current On-site Operations	None
Current Use of Hazardous Substances	None observed
UTILITY PROVIDER INFORMATION	
Natural Gas Provider	None provided
Electricity Provider	None provided
Potable Water Provider or Source	None provided
Sewage Disposal Provider or Treatment System	None provided
REGULATORY INFORMATION	
Regulatory Database Listings	None identified
Institutional Controls	None identified
Engineering Controls	None identified
Environmental Liens	None identified

Refer to Figure 1: Topographic Map, Figure 2: Site Map and Appendix A: Property Photographs for site location and description.

## 2.2 SITE AND VICINITY CHARACTERISTICS

The immediately surrounding properties consist of the following:

Direction from Site	Tenant/Use (Address)	Regulatory Database Listing(s)
North	Benning Road followed by Metro elevated tracks and a PEPCO Benning Road Service Center (3400 Benning Road)	RCRA LQG, DC UST, NY Manifest, PA Manifest, NJ Manifest
East	A liquor store at 3445 Benning Road and an associated parking lot	None
northeast	A vacant former restaurant, auto repair facility, and gas station at 3465 Benning Road	DC Hist UST, EDR US Hist Auto Station
South	Residential row homes located along Eads Street	None Identified
West	Commercial building with several restaurants, medical, and retail uses (3421-3439 Benning Road) and residential row homes along Eads Street.	EDR Hist Cleaners

## 2.3 PHYSICAL SETTING

Information with regard to the geology and hydrogeology of the site and surrounding area was obtained from information reasonably ascertainable. A description of the soil, groundwater, and geological characteristics are provided below and provide the basis for opinions rendered specific to the potential for migration of on-site and off-site sources of environmental concerns.

### Topography

The Property is at an elevation of approximately 36 feet above mean sea level (msl) on the northwestern side to 40 feet above msl on the southeastern side. The Property is relatively flat and slopes down gently to the northwest. The overall slope of the surrounding area is down to the north and west from the Property (see *Figure 2- Locus Map*, which is a portion of the Washington East, DC MD USGS Quadrangle).

### Physiographic Province

Information concerning the geology of the Property was obtained from the USGS National Water Summary, Virginia region (1984). A review of regional geologic information indicates that the Property is located within the Coastal Plain physiographic province and is underlain by the Cretaceous-aged Potomac Group. The Potomac Group is composed of the Raritan, Patuxent, and Patapsco Formations, and Arundel Clays. In addition, the formations and Arundel clays are mostly interbedded quartzose gravels, protoquartzitic to orthoquartzitic argillaceous sands, and white and dark multicolored silts and clays.

## Soil

ICOR reviewed the United States Department of Agriculture's (USDA's) Soil Survey of the District of Columbia (accessed on line) to obtain soils information for the SITE. According to the survey, the Property is underlain by the Urban Land – Woodstown soil complex (with 0 to 2 percent slopes). The survey defined urban land as areas where 80 percent or more of the surface are covered by concrete, asphalt, buildings, shopping centers, or other impervious surfaces. In addition, the survey indicated that some of the natural subsurface soils have been replaced with "foreign" fill materials. The Woodstown soils are moderately well-drained soils consisting of sandy loams and loamy sands to a depth of at least 80 inches.

## Hydrogeology

No surface water bodies are present on the Property. The nearest surface water is the Anacostia River, located approximately 1,450 feet west of the Property.

Wet or marshy areas were not observed at the Property at the time of the ICOR inspection. Based on a review of National Wetlands Inventory Maps, the Property is not located within a designated wetland area. Local groundwater gradient is expected to follow surface topography; therefore, groundwater flow near the Property is expected to flow to the west and north. Groundwater flow gradients are best evaluated by a subsurface investigation involving the installation of at least three groundwater monitoring wells and precise measurements of hydrostatic pressure.

ICOR did not observe any monitoring wells on the Property and no former or current septic systems were reported by site contacts or by the District of Columbia Health Department.

## Floodplain Designation

The Federal Emergency Management Agency (FEMA) maps and rates flood hazard zones throughout the United States. These zones are depicted on a Flood Insurance Rate Map (FIRM), designated by Community Map and Panel numbers. The flood hazard zones range from Zone A or AE (A1 – A130), with Base Flood Elevations (BFE) determined, to Zone X, unshaded areas outside the 500-year floodplain.

The Property Flood Zone Determination appears to be Zone X for the Property. Zone X is defined as an area outside the 100-year and 500-year floodplains. The Property is included on Community Map #110001 Panel No. 0039C, dated September 27, 2010. A copy of the Flood Zone Map is presented in Appendix F.

A review of the USGS topographic map of the Washington East, DC MD Quadrangle provided in the EDR report did not indicate the presence of potential wetland areas. The entire Property is fully developed with paved areas with no evidence of wetlands type conditions.



### 3.0 HISTORICAL REVIEW OF SITE AND VICINITY

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#### 3.1 HISTORICAL SUMMARY

Reasonably ascertainable standard historical sources as outlined in ASTM Standard E1527-13 were used to determine previous uses and occupancies of the Property that are likely to have led to RECs in connection with the Property. A chronological summary of historical data found, including but not limited to aerial photographs, historical city directories, Sanborn fire insurance maps and agency records is as follows:

Date Range	Property Description/Use	Source(s)
1906 to 1956	Undeveloped lots with grassy or dirt coverings. Some vehicle parking is present.  No permanent structures were identified except for a thin building located along the western border with the adjacent retail building fronting Benning Road.	Aerial photographs, topographic maps, Sanborn fire insurance maps, city directories
1957-Present	The majority of the Property is paved and used for vehicle parking. There is fencing surrounding some lots beginning around 2000.  No permanent structures were identified except for a thin building located along the western border with the adjacent retail building fronting Benning Road.	Aerial photographs, topographic maps, Sanborn fire insurance maps, city directories, municipal records, site observation

Based on a review of historical sources, the Property was identified to consist of undeveloped, grassy lots with no identified structures or uses from at least 1906 until the lots were paved around the mid-1950s. No permanent structures were identified on the Property except for a small, thin structure located along the western border with the adjacent retail building fronting Benning Road. The use of this small structure has not been determined.

ICOR did not identify potential environmental concerns in association with the current or historical use of the Property.

#### 3.2 AERIAL PHOTOGRAPH REVIEW

ICOR reviewed aerial photographs of the Property and surrounding area. Aerial photographs were reviewed on line at NETR and were not obtained. Additional aerial photographs were obtained from Google Earth. Aerial photographs were reviewed for the following years:

<b>Year(s)</b>	<b>Property Description</b>	<b>Adjacent Site Descriptions</b>
1949, 1951, 1957	Grassy areas with some cars parked on them.  No permanent structures were identified except for a thin portion of a building located along the western border with the adjacent retail building fronting Benning Road.	<b>North:</b> Benning Road followed by a large industrial lot <b>East:</b> A retail store and a grassy lot <b>Northeast:</b> Two different commercial buildings with multiple cars visible <b>South:</b> Residential row homes <b>West:</b> Retail building and residential row homes
1957, 1963, 1964	The Property lots have been paved with many cars parked on them.  No permanent structures were identified except for a thin portion of a building located along the western border with the adjacent retail building fronting Benning Road.	<b>North:</b> Benning Road followed by a large industrial lot with surface storage <b>East:</b> Undeveloped land and a retail store <b>Northeast:</b> Two commercial buildings with multiple cars visible. These buildings were replaced with one larger structure by 1964. <b>South:</b> Residential row homes <b>West:</b> Retail building and residential row homes
1980, 1988	The majority of the Property is paved with cars parked in lined spaces throughout.  No permanent structures were identified except for a thin portion of a building located along the western border with the adjacent retail building fronting Benning Road.	<b>North:</b> Benning Road followed by a large industrial lot with parking and surface storage <b>East:</b> Undeveloped land and a retail store <b>Northeast:</b> One smaller commercial building surrounding by paved areas <b>South:</b> Residential row homes <b>West:</b> Retail building and residential row homes
1994, 1999	The majority of the Property is paved with cars parked in lined spaces throughout.  No permanent structures were identified except for a thin portion of a building located along the western border with the adjacent retail building fronting Benning Road.	<b>North:</b> Benning Road followed by elevated tracks, a large industrial lot with parking, and surface storage <b>East:</b> Undeveloped land (recreational park) and a retail store <b>Northeast:</b> One smaller commercial building surrounding by paved areas <b>South:</b> Residential row homes <b>West:</b> Retail building and residential row homes
2005, 2010, 2013	The Property remains undeveloped, except for asphalt paving throughout. The majority of the southern lots are paved and surrounded by a fence. There is a small shed at the northwest corner of the southern lots.  No permanent structures were identified except for a thin portion of a building located along the western border with the adjacent retail building fronting Benning Road.	<b>North:</b> Benning Road followed by a large industrial lot with elevated tracks, paved parking, and structures <b>East:</b> Undeveloped land (recreational park) and a retail store <b>Northeast:</b> One smaller commercial building surrounding by paved areas <b>South:</b> Residential row homes <b>West:</b> Retail building and residential row homes

ICOR did not identify potential environmental concerns in association with the historical use of the Property during the aerial photograph review.

If available, copies of historical aerial photographs are provided in the report appendices.

### 3.3 SANBORN FIRE INSURANCE MAPS

Sanborn Fire Insurance maps were developed in the late 1800s and early 1900s for use as an assessment tool for fire insurance rates in urbanized areas. A search was made of the Environmental Data Resources, Inc. (EDR) collection of Sanborn Fire Insurance maps. Sanborn Fire Insurance maps were reviewed for the following years:

Year(s)	Property Description	Adjacent Site Descriptions
1960	The Property areas appear to be undeveloped with no permanent structures uses identified uses except for a small portion of building attached to the adjacent retail building present on the northern lot fronting Benning Road.	<b>North:</b> Benning Road <b>East:</b> A retail store (3443 Benning Road) and a grassy lot identified as a playground <b>Northeast:</b> Two different commercial buildings identified as "auto laundry" and auto repair (3465 Benning Road) <b>South:</b> Residential row homes along Eads Street <b>West:</b> Retail building (3421-3439 Benning Road) and residential row homes along Eads Street
1977, 1985, 1989	The Property areas appear to be undeveloped with no permanent structures uses identified uses except for a smaller portion of building attached to the adjacent retail building present on the northern lot fronting Benning Road.	<b>North:</b> Benning Road <b>East:</b> A retail store (3443 Benning Road) and a grassy lot identified as a playground <b>Northeast:</b> One rectangular shaped commercial building (now identified at 3451 Benning Road) <b>South:</b> Residential row homes along Eads Street <b>West:</b> Retail building (3421-3439 Benning Road) and residential row homes along Eads Street
1990, 1992, 1995, 1998	The Property areas appear to be undeveloped with no permanent structures uses identified uses except for a smaller portion of building attached to the adjacent retail building present on the northern lot fronting Benning Road.	<b>North:</b> Benning Road <b>East:</b> A retail store (3443 Benning Road) and a grassy lot identified as a playground <b>Northeast:</b> One rectangular shaped commercial building (identified at 3451 Benning Road) <b>South:</b> Residential row homes along Eads Street <b>West:</b> Retail building (3421-3439 Benning Road) and residential row homes along Eads Street

ICOR did not identify potential environmental concerns in association with the historical use of the subject property during the Sanborn fire insurance map review. The site to the northeast was identified as an auto repair facility in 1960.

If available, copies of historical Sanborn fire insurance maps are provided in the report appendices.

### 3.4 CITY DIRECTORIES

A search of historical city directories was conducted for the Property by EDR. The following table summarizes the results of the city directory search.

*City Directory Search Results*

<b>Year(s)</b>	<b>Address — Occupant Listed</b>
1922-1936	<p>3443 Benning Road and 3440-3460 (estimated former addresses, if they existed) Eads Street were not included in the directories.</p> <p>No adjacent listings were included in the directories, except for a residential listing at 3449 Benning Road to the north in 1926.</p>
1940-1983	<p>No Property listings were included in the directories reviewed, except for a residential listing at 3443 Benning Road in 1940.</p> <p>Adjacent listings to the west included retail and medical office uses at 3431-3439 Benning Road, except for 3427-3429 Benning Road, which was identified as a dry cleaners from 1943-1983. Adjacent listings to the east, northeast included Benning Liquors or a grocery store at 3445 Benning Road from 1940-1983, a residential listing at 3449 Benning Road in 1940, and a used car lot (1954) and a gas station (1960) at 3465 Benning Road. Residential listings were included to the west and south along Eads Street in the directories reviewed.</p>
1993-2013	<p>No Property listings were included in the directories reviewed, except for a residential listing at 3443 Benning Road in 2000.</p> <p>Adjacent listings to the west included retail, church, restaurant and medical office uses at 3431-3439 Benning Road. Adjacent listings to the east, northeast included Benning Liquors at 3445 Benning Road, a contractor listing in 1993 and an auto sales listing at 3451 Benning Road in 2006 and 2008, a residential listing at 3461 Benning Road in 2000, and a towing company at 3465 Benning Road in 2000. Residential listings were included to the west and south along Eads Street in the directories reviewed.</p>

Based on the review of city directories, the Property has been largely undeveloped throughout the timeframe reviewed. Only two residential type listings were included for one Property address at 3443 Benning Road in the directories reviewed. The surrounding area was primarily retail or residential except for a dry cleaners (3427-3429 Benning Road) located approximately 110 feet to the west and downgradient from the Property between 1943 and 1983, and a gas station and auto repair facility that was located adjacent and cross to slightly upgradient to the northeast from at least 1954 to 1960 (3451 and 3465 Benning Road). The listings at 3451 and 3465 Benning Road were very limited and, based on a review of other historical documents, it is likely that such uses were conducted on site for a longer period of time.

ICOR did not identify potential environmental concerns in association with the historical use of the subject property and surrounding properties during the city directory review, except for the former nearby dry cleaners and auto repair/gas station facility. These two former nearby uses are further discussed in Section 5.1.

If available, copies of historical city directories are provided in the report appendices.

### **3.5 HISTORICAL TOPOGRAPHIC MAPS**

A search of historical topographic maps was conducted for the Property at the USGS web site. Only the 1983 topo map was available. ICOR reviewed historic topographic maps at the NETR web site but did not obtain them for this ESA. Topographic maps were reviewed for the following years:

<b>Year(s)</b>	<b>Property Description</b>	<b>Adjacent Site Descriptions</b>
1906, 1912, 1921, 1934	These maps are of a smaller scale with limited notations. No structures or uses were identified on the maps.	<b>North:</b> Benning Road <b>East:</b> No identified uses <b>South:</b> No identified uses <b>West:</b> No identified uses
1945, 1951, 1959, 1962 1966	The Property area is shaded pink to indicate heavy urban development.	<b>North:</b> Benning Road followed by railroad tracks (north) and industrial development with large aboveground oil tanks (northwest) <b>East:</b> Shaded pink with no structures shown <b>South:</b> Shaded pink with no structures shown <b>West:</b> Shaded pink with no structures shown
1971, 1979	The Property area is shaded pink to indicate heavy urban development.	<b>North:</b> Benning Road followed by railroad tracks (north) and industrial development with large aboveground oil tanks (northwest) <b>East:</b> Shaded pink with no structures shown <b>South:</b> Shaded pink with no structures shown <b>West:</b> Shaded pink with no structures shown
1983, 1984, 1988, 1992	The Property area is shaded pink to indicate heavy urban development.	<b>North:</b> Benning Road followed by railroad tracks (north) and industrial development with large aboveground oil tanks (northwest) <b>East:</b> Shaded pink with no structures shown <b>South:</b> Shaded pink with no structures shown <b>West:</b> Shaded pink with no structures shown

ICOR did not identify potential environmental concerns in association with the historical use of the Property during the historic topographic map review.

Because the available maps were reviewed on line and not obtained, there are no copies of historical topographic maps are provided in the report appendices.

### **3.6 CHAIN OF TITLE**

In accordance with our approved scope of services, a chain of title search was not performed as part of this assessment.

## **4.0 REGULATORY AGENCY RECORDS REVIEW**

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### **4.1 REGULATORY AGENCIES**

Local and state agencies, such as environmental health departments, fire prevention bureaus, and building and planning departments are contacted to identify any current or previous reports of hazardous substance use, storage, and/or unauthorized releases that may have impacted the Property. In addition, information pertaining to Access Use Limitations (AULs), defined as legal or physical restrictions, or limitations on the use of, or access to, a site or facility, is requested.

#### **4.1.1 LOCAL ENVIRONMENTAL HEALTH DEPARTMENT AND/OR STATE ENVIRONMENTAL AGENCY**

On May 6, 2015, ICOR contacted the District of Columbia Health Department for information on the Property and adjacent properties. Files at this agency may contain information regarding wells and/or septic systems and areas of impacts to groundwater.

ICOR has not received a response from the District of Columbia Health Department for the Property. If significant materials are received from the fire department, they will be forwarded to the client.

#### **4.1.2 FIRE DEPARTMENT**

On May 6, 2015, ICOR contacted the District of Columbia Fire & Rescue Department for information on the Property and adjacent properties. Files at this agency may contain information regarding HAZMAT inspections and issues and petroleum tanks and releases.

A response from the District of Fire & Rescue Department was received for the Property indicating that no HAZMAT files were found for the Property addresses. ICOR was informed that all tank and release records formerly maintained by the Fire Department were transferred to the District of Columbia Department of the Environment.

#### **4.1.3 BUILDING DEPARTMENT**

On May 6, 2015, ICOR reviewed Property permits using an on line permit search tool for information on the Property in order to identify historical tenants, features of concern and property use.

ICOR did not find any permits for the Property address (3443 Benning Road, NE) available on line. The Eads Street parcels do not have identified addresses in which to search.

#### **4.1.4 PLANNING DEPARTMENT**

On May 6, 2015, ICOR contacted the District of Columbia Planning Department via FOIA for information on the Property in order to identify historical tenants, features of concern and property use.

ICOR has not received a response from the District of Columbia Planning Department for the Property. If significant materials are received from the fire department, they will be forwarded to the client.

#### **4.1.5 ASSESSOR OFFICE**

On May 12, 2015, ICOR visited the District of Columbia Assessors web site for information on the Property in order to determine the earliest recorded date of development and use.

According to the District of Columbia Assessors web site, there are no structures identified for any of the Property parcels.

#### **4.1.6 OIL AND GAS WELLS**

ICOR could not locate any oil gas well maps for the Property area. No indications of oil or gas wells were found during a review of topographic maps for the Property area.

#### **4.1.7 OTHER AGENCIES SEARCHED**

On May 6, 2015, ICOR contacted the District of Columbia Department of the Environment for files pertaining to hazardous waste generation, USTs, LUSTs, and spills at or adjacent to the Property and adjacent properties.

ICOR has not received a response from the District of Columbia Department of the Environment for the Property. If significant materials are received from the fire department, they will be forwarded to the client.

#### **4.1.8 STATE ENVIRONMENTAL SUPERLIENS AND PROPERTY TRANSFER LAWS**

On May 13, 2015, ICOR conducted a web search to determine if the District of Columbia has environmental superlien and/or property transfer laws which would allow environmental authorities the right to place a first priority lien on the Property.

According to the NETR web site, District of Columbia has not adopted the Uniform Federal Lien Registration Act. Environmental Liens are filed in the Office of the Recorder of Deeds. Environmental Liens may also be filed in the Federal District Court for the District in which the property is found. District of Columbia does not have a statute imposing a super priority lien for clean-up of hazardous waste

D.C. Code §42-3131.01 (1979) (recodified from §6-711.01) (allows a tax to be assessed against property which if unpaid is the basis for obtaining a lien against the property) D.C. Mun. Regs. Tit. 20 §4014 (1996). DC Code Section 8-113.05 (underground storage tanks; reasonable costs of correction and related expenses collected in same manner as real estate taxes); DC Code 47-1312 (a-1) (real estate taxes as super priority lien); DC Code Section 8-113.09 (compliance orders; cease and desist orders).

## 5.0 REGULATORY DATABASE RECORDS REVIEW

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ICOR contracted Environmental Data Resources, Inc. (EDR) to conduct a search of publicly available information from federal, state, tribal, and local databases containing known and suspected sites of environmental contamination and sites of potential environmental significance. Data gathered during the current regulatory database search is compiled by EDR into one regulatory database report. Location information for listed sites is designated using geocoded information provided by federal, state or local agencies and commonly used mapping databases with the exception of "Orphan" sites. Due to poor or inadequate address information, Orphan sites are identified but not geocoded/mapped by EDR, rather, information is provided based upon vicinity zip codes, city name, and state. The number of listed sites identified within the approximate minimum search distance from the federal and state environmental records database listings specified in ASTM Standard E1527-13 is summarized in Section 5.1, along with the total number of Orphan sites. A copy of the regulatory database report is included in Appendix B of this report.

The Property was not identified in the regulatory databases reviewed.

In determining if a listed site is a potential environmental concern to the Property, ICOR generally applies the following criteria to classify the site as lower potential environmental concern: 1) the site only holds an operating permit (which does not imply a release), 2) the site's distance from, and/or topographic position relative to, the Property, and/or 3) the site has recently been granted "No Further Action" by the appropriate regulatory agency.

### 5.1 RECORDS SUMMARY

Database	Search Distance (Miles)	Property Listed	Number of Listings within Search Distance	Recognized Environmental Condition or Other Environmental Consideration (Yes, No or N/A)
NPL	1	No	0	
DELISTED NPL	0.5	No	0	
CERCLIS	0.5	No	0	The listed facility address was searched and found to be more than 1.5 miles from the Property.
CERCLIS NFRAP	0.5	No	0	
RCRA CORRACTS	1	No	0	
RCRA-TSDF	0.5	No	0	



Database	Search Distance (Miles)	Property Listed	Number of Listings within Search Distance	Recognized Environmental Condition or Other Environmental Consideration (Yes, No or N/A)
RCRA LQG, SQG, CESQGs, VGN, NLR	SP/ADJ	No	1	No; The identified facility is located to the north and downgradient from the Property. As such, the facility is not expected to represent a significant environmental concern.
US ENG CONTROLS	SP	No	0	
US INST CONTROLS	SP	No	0	
ERNS	SP	No	0	
STATE/TRIBAL HWS	0.5	No	0	
STATE/TRIBAL SWLF	0.5	No	1	No; This facility is a recycling facility that is located nearly 0.5 miles to the west and significantly down gradient. Based upon the distance and relative gradient from the Property, the facility is not expected to represent a significant environmental concern.
STATE/TRIBAL REGISTERED STORAGE TANKS/HISTORICAL UST	SP/ADJ	No	1	An identified historical auto station was present to the northeast and is further discussed below.
STATE/TRIBAL LUST/LTANKS	0.5	No	18	No; The majority of the facilities are located more than ¼-mile from the Property or are located topographically downgradient from the Property. As such the facilities are not expected to represent a significant environmental concern.
STATE/TRIBAL EC and IC	SP	No	0	
STATE/TRIBAL VCP	0.5	No	0	
STATE/TRIBAL BROWNFIELD	0.5	No	11	No; all 11 properties are located more than ¼-mile from the Property and none have reported releases.

Database	Search Distance (Miles)	Property Listed	Number of Listings within Search Distance	Recognized Environmental Condition or Other Environmental Consideration (Yes, No or N/A)
ORPHAN	N/A	No	7	No; none of the listed facilities appear to be located within the Property area.
ADDITIONAL ENVIRONMENTAL RECORD SOURCES	SP/ADJ	No	2	No; A former tenant of the adjacent retail building to the west was occupied by a dry cleaners from approximately 1943 to 1983. However, based on the distance from the Property and the down gradient hydraulic gradient away from the Property, this former cleaners is not expected to represent a significant environmental concern. An identified historical auto station was present to the northeast and is further discussed below.

SP: Property  
ADJ: adjacent property

Facility Name: PEPCO Benning Service Center/Benning Road Generating Station
Database(s): RCRA-LQG, DC UST, NY Manifest, PA Manifest, & NJ Manifest
Address: 3400 Benning Road
Distance: Adjacent (large facility with working areas farther north and west)
Direction: North (hydrologically downgradient)
Comments:
<p>According to the EDR report and files obtained from the internet search for the Benning Road Generation Plant, the Benning Road plant is a 77-acre facility boarded on the east by the Kenilworth neighborhood, commercial areas to the south, and on the west by the Anacostia River. It was constructed in 1906, and operated several different electricity-generating units over the years. Two steam turbine units generated power and occupied only 20% of the site. The rest housed PEPCO's Benning Service Center and major electric transmission and distribution facilities. The plant, which only operated ten to fifteen days per year during periods of peak energy demand, was officially closed in 2012.</p> <p>In 2008 the EPA completed a comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) assessment and not only found high levels of PCBs in the site's soil, but also downstream of the Benning Road plant. Following the release of this report, the District sued PEPCO claiming that the company is responsible for the costs of a cleanup under the Resource Conservation and Recovery Act (RCRA), Superfund, and DC Brownfield Revitalization Act. Shortly after, Pepco entered into voluntary negotiations with the District and a legally binding consent decree was issued.</p> <p>Closure of the facility and assessment and cleanup of impacts to the west of the facility and along the Anacostia River are ongoing. Based upon the distance to the functioning areas of this large facility, the completed assessments and remedial actions, and the relative downgradient topographic slope away</p>

Facility Name: PEPCO Benning Service Center/Benning Road Generating Station
from the Property, the site is not expected to represent a significant environmental concern.

Facility Name: Unknown
Database(s): DC Historical UST
Address: 3465 Benning Road NE
Distance: Adjacent
Direction: Northeast (hydrologically cross to upgradient)
Comments: According to the EDR report this unknown facility had registered tanks, but the current status of those tanks is unknown. No reported releases or issues were identified for the facility tanks. This facility is located cross to slightly upgradient to the Property. However, this area slopes down to the north, northwest, which is away from the Property. Based upon the distance and the relative cross to upgradient topographic slope, the site is not expected to represent a significant environmental concern. However, the former buildings and uses, as well as the unknown status of the tanks at the site remain a potential concern. However, due to the lack of potential current or past uses of the Property involving petroleum products, the owner of the Property would not be considered responsible for any cleanup required if off-site impacts to the Property are found.

## 5.2 VAPOR MIGRATION

ICOR reviewed reasonably ascertainable information for the subject and nearby properties, including a regulatory database, files for nearby release sites, and/or historical documentation, to determine if potential vapor-phase migration concerns may be present which could impact the Property.

Based on a review of available resources as documented in this report, ICOR did not identify significant on-site concerns and/or regulated listings from nearby sites which suggest that a vapor-phase migration concern currently exists at the Property.

## **6.0 INTERVIEWS AND USER PROVIDED INFORMATION**

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### **6.1 INTERVIEWS**

Pursuant to ASTM E1527-13, the following interviews were performed during this assessment in order to obtain information indicating RECs in connection with the Property.

#### **6.1.1 INTERVIEW WITH OWNER**

The Property owner, Mr. Seresa Coleman, is an elderly man who is difficult to reach for interview. ICOR made several attempts through Mr. Coleman's consultant, Mr. Kevin Mack, but was not successful in reaching him for an interview. Mr. Mack, who has been familiar with the Property for many years did not know what, if any use the small concrete block structure had, but he indicated that the Property has been used for parking only for as long as he can remember.

#### **6.1.2 INTERVIEW WITH KEY SITE MANAGER**

The Property consists of paved, unoccupied lots. As such, there was no Key Site Manager associated with the Property.

#### **6.1.3 PAST OWNERS, OPERATORS AND OCCUPANTS**

In an attempt to interview past owners, operators and occupants regarding historical on-site operations, ICOR requested the contact information for these entities from the current Property owner. However, Mr. Coleman was not available to give us contact information for previous owners.

#### **6.1.4 INTERVIEW WITH OTHERS**

Information obtained during interviews with local government officials is incorporated into the appropriate segments of this section.

### **6.2 USER PROVIDED INFORMATION**

User provided information is intended to help identify the possibility of RECs in connection with the Property. According to ASTM E1527-13 and the EPA Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), certain items should be researched by the prospective landowner or grantee, and the results of such inquiries may be provided to the Environmental Professional. The responsibility for qualifying for LLPs by conducting the inquiries ultimately rests with the User, and providing the information to the Environmental Professional would be prudent if such information is available.

The User completed the ASTM User Questionnaire and provided the User information to ICOR. A copy of the User Questionnaire and responses is included in the appendix. ICOR assumes that qualification for the LLPs is being established by the User in documentation outside of this assessment.

### **6.3 PREVIOUS REPORTS AND OTHER PROVIDED DOCUMENTATION**

No prior reports or other relevant documentation in association with the Property was made available to ICOR during the course of this assessment.

## 7.0 SITE RECONNAISSANCE

<b>Site Reconnaissance Date</b>	May 11, 2015
<b>ICOR Site Assessor</b>	Christina Archambeault
<b>Property Escort/Relationship to Property</b>	None
<b>Units/Areas Observed</b>	All (from outside a chain link fence)
<b>Area(s) not accessed and reason(s)</b>	A small concrete structure in the northern lot and a small shed on the Eads street fenced lot were not accessed due to locked chain link fences at both locations.
<b>Weather</b>	Mostly sunny and approximately 85 degrees

### 7.1 PROPERTY RECONNAISSANCE FINDINGS

Yes	No	Observation
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Regulated Hazardous Substances/Wastes and/or Petroleum Products in Connection with Property Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Aboveground/Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substance and Petroleum Product Containers Not in Connection with Property Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Unidentified Substance Containers
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Electrical or Mechanical Equipment Likely to Contain Fluids
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Interior Stains or Corrosion
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Strong, Pungent or Noxious Odors
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pools of Liquid
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Drains, Sumps and Clarifiers
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pits, Ponds and Lagoons
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stained Soil or Pavement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stressed Vegetation
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Solid Waste Disposal or Evidence of Fill Materials
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Waste Water Discharges
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Wells
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Septic Systems
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Biomedical Wastes
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Other

The Property is currently not occupied and consists of two fenced lots and a small gravel areas with a small concrete structure and small storage shed. No specific uses were identified for the Property.

**OTHER CONCERNS**

Small areas of dumping were observed around the Property areas, especially the unfenced gravel area at the southeastern portion of the Property. The observed materials were typical municipal trash consisting of food containers and paper.

**7.2 ADJACENT PROPERTY RECONNAISSANCE FINDINGS**

Yes	No	Observation
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substances and/or Petroleum Products in Connection with Property Use
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Aboveground and Underground Hazardous Substance or Petroleum Product Storage Tanks (ASTs / USTs)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hazardous Substance and Petroleum Product Containers and Unidentified Containers Not in Connection with Property Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Unidentified Substance Containers
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Electrical or Mechanical Equipment Likely to Contain Fluids
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Strong, Pungent or Noxious Odors
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pools of Liquid
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Drains, Sumps and Clarifiers
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Pits, Ponds and Lagoons
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stained Soil or Pavement
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Stressed Vegetation
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Solid Waste Disposal or Evidence of Fill Materials
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Waste Water Discharges
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Wells
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Septic Systems
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Other

**ABOVEGROUND & UNDERGROUND HAZARDOUS SUBSTANCE OR PETROLEUM PRODUCT STORAGE TANKS (ASTs / USTs)**

The vacant commercial property to the northeast had a visible AST identified as “used oil” present on the eastern portion of the site. This property was formerly identified as a gas station, auto repair facility, car wash, and used car dealership. The tank was observed to be in good condition with no signs of leaks or damage. The observed tank is not expected to represent a significant environmental concern.

Due to the identification of this property as a gas station and auto repair facility, it is likely that tanks formerly used on site were closed in place, removed, or still remain on site. This property is located cross to downgradient from the Property and as such, has a low potential to impact the Property. However, due to the unknown condition/disposition of the tanks and prior use as a gas station, the potential impacts from this site cannot be ruled out. As such, this former gas station and auto repair facility is considered a di minimis condition for the Property. However, due to the lack of potential current or past uses of the Property involving petroleum products,

the owner of the Property would not be considered responsible for any cleanup required if off-site impacts to the Property are found.

**ELECTRICAL OR MECHANICAL EQUIPMENT LIKELY TO CONTAIN FLUIDS**

Several pole-mounted transformers were observed on the adjacent sites and along roadways during the site reconnaissance. No spills, staining or leaks were observed on or around the transformers. Based on the good condition of the equipment, the transformers are not expected to represent a significant environmental concern.

## **8.0 OTHER ENVIRONMENTAL CONSIDERATIONS**

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### **8.1 RADON**

Radon is a naturally-occurring, odorless, invisible gas. Natural radon levels vary and are closely related to geologic formations. Radon may enter buildings through basement sumps or other openings.

The United States EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three radon zones, with Zone 1 being those areas with the average predicted indoor radon concentration in residential dwellings exceeding the EPA Action Limit of 4.0 pCi/L. It is important to note that the EPA has found homes with elevated levels of radon in all three zones, and the EPA recommends site specific testing in order to determine radon levels at a specific location. However, the map does give a valuable indication of the propensity of radon gas accumulation in structures.

Radon sampling was not requested as part of this assessment. According to the United States EPA, the radon zone level for the area is Zone 2, which has a predicted average indoor screening level between 2 and 4 pCi/L, at or below the action level of 4 pCi/L set forth by the EPA.

### **8.2 DRINKING WATER SOURCES AND LEAD IN DRINKING WATER**

Public drinking water and sanitary sewer services are supplied to the area by the District of Columbia Water and Sewer Authority (DC WASA). The drinking water source is the upper Potomac River, and the water is treated at either the Dalecarlia or MacMillan Water Treatment Plants prior to distribution. The most recent water quality report states that lead levels in the areas water supply were well within standards established by the USEPA.



## 9.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS

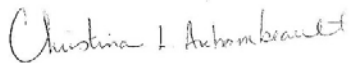
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We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of 40 CFR Part 312.

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

Prepared By:

Reviewed By:



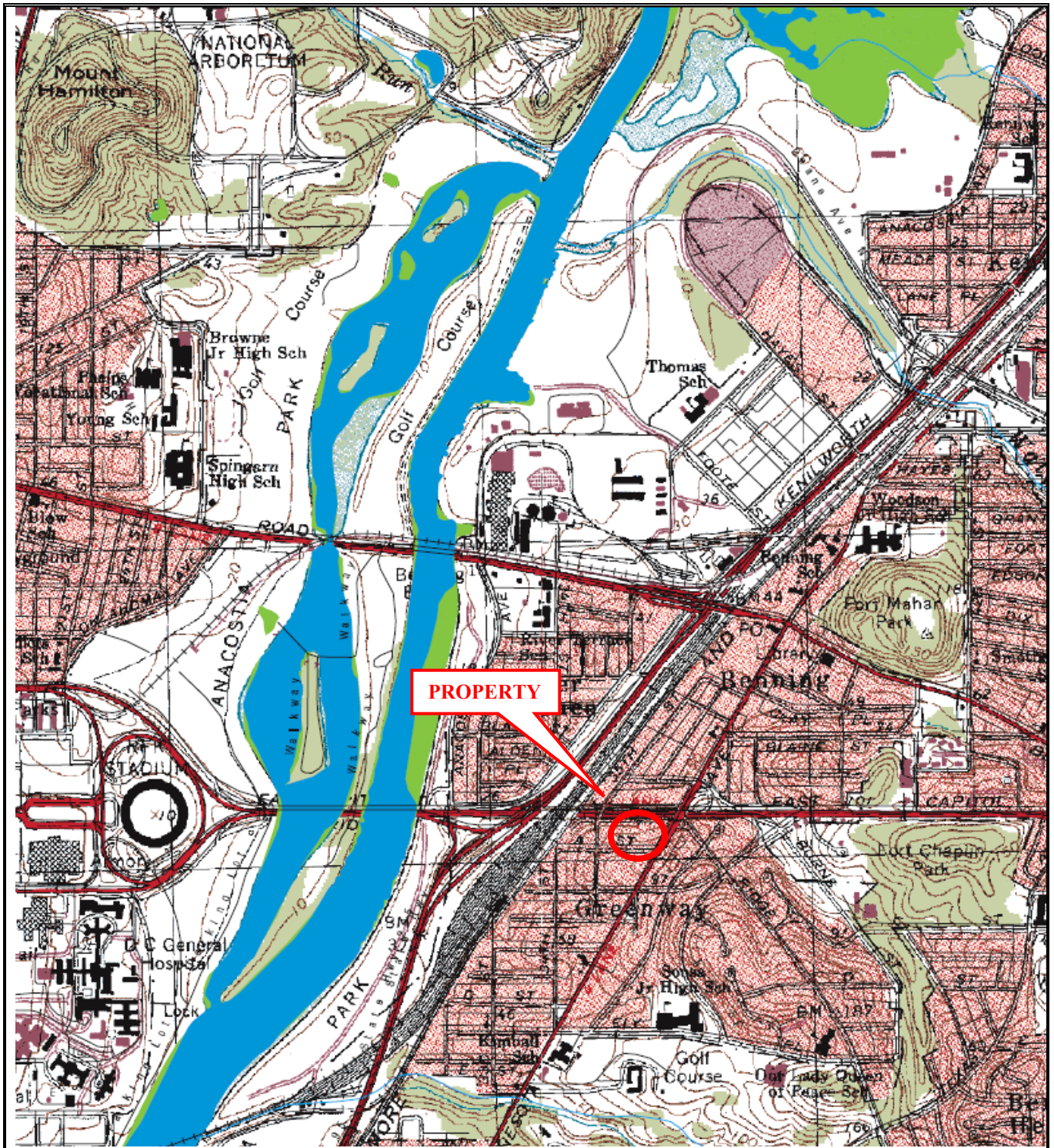
Christina Archambeault  
Associate Consultant

Mr. Ike Singh  
Senior Author

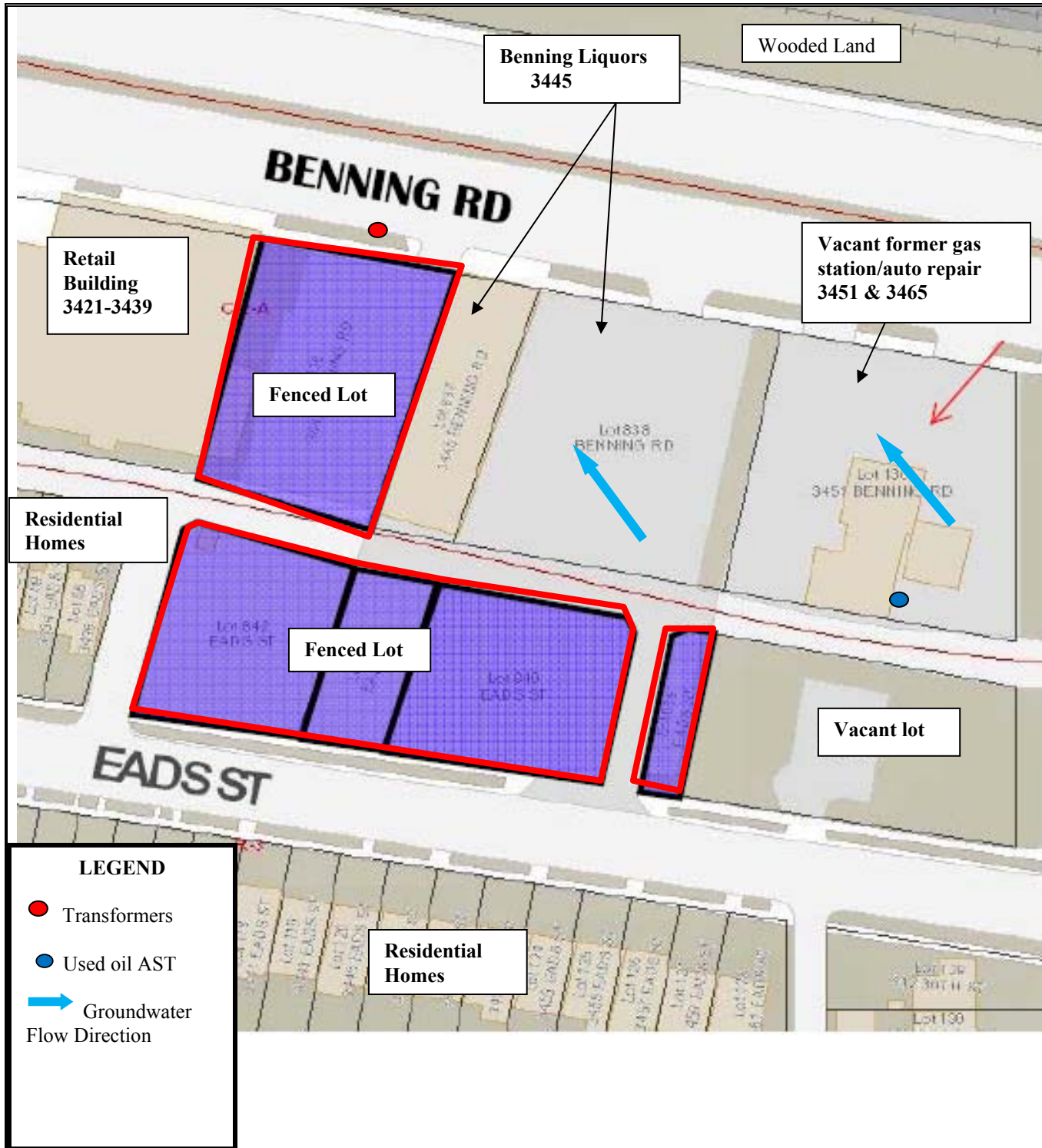
## 10.0 REFERENCES

Item	Date(s)	Source
Topographic Map Washington East, DC MD Quadrangle	1983	USGS-obtained
Topographic Map Washington East, DC MD Quadrangle	1906, 1912, 1921, 1934, 1945, 1951, 1959, 1962, 1966, 1971, 1979, 1983, 1984, 1988, 1992	NETR-reviewed on line
Regulatory Database Report	April 7, 2015	EDR
Assessor's Information and Parcel Map	May 2015 (Obtained)	District of Columbia Real Estate Assessments
Soils Information	May 2015 (Accessed)	USDA Web Soil Survey websoilsurvey.nrcs.usda.gov
Radon Zone Information	1993	US EPA Map of Radon Zones epa.gov/radon/zonemap.html
Water Quality Report	2013	DCWASA (reviewed)
Depth to Groundwater Information	N/A	Area geologic information on line
Sanborn Map Report	1960, 1977, 1985, 1989, 1990, 1992, 1995, 1998	EDR
Aerial Photographs	1949, 1988, 1994, 1999, 2005, 2010, 2013	Google Earth-Obtained
Aerial Photographs	1949, 1951, 1957, 1963, 1964, 1980	NETR-reviewed on line
Oil and Gas Wells Information	N/A	
City Directories	1922-2013	EDR
Building Records	Unknown	DC Permit Search
AULs	Unknown	FOIA to DC Planning
Hazardous Substance Records	Unknown	FOIA to DC Fire & Rescue and DDOE
UST Records	Unknown	FOIA to DDOE
LUST Information	Unknown	FOIA to DDOE
Air Quality Records	Unknown	FOIA to DDOE
Hazardous Waste Records	Unknown	FOIA to DDOE
Interview	May 14, 2015	Mr. Ulysses Auger, purchaser
Interview (attempts)	May 14, 18, and 29, 2015	Mr. Seresa Colman, Owner
National Wetlands Inventory Map	May 14, 2015	US Fish & Wildlife Service Wetland Mapper <a href="http://www.fws.gov/wetlands/Data/Mappe r.html">http://www.fws.gov/wetlands/Data/Mappe r.html</a>

## FIGURES



<p>ICOR<sub>LTD</sub></p>	<p><b>FIGURE 1</b> <b>SITE LOCATION MAP</b></p>	<p>↑ N</p>
<p>ICOR Project No. 15NDC05</p>	<p>Site: 3443 Benning Road NE Washington, DC  Scale: 1" = 24,000'  Date: 1982  Source: USGS Washington East, DC MD 7.5 Minute Quadrangle</p>	



**APPENDIX A**  
**PROPERTY PHOTOGRAPHS**



1. View of the Property at 3443 Benning Road NE Washington, DC



2. View of the northern fenced lot looking south



1. View of the small concrete block structure located on the western side of the northern fenced lot



2. View of northern fenced lot looking north from the alley located at the rear of the lot



3. View of the adjacent night club and event space to the west along Benning Road



4. View of the adjacent Benning Liquors located east of the northern Property parcel



5. View of the adjacent former gas station and auto repair facility to the northeast



6. View of the large parcel located along Eads Street





7. View of a small shed located at the northwestern corner of the large parcel located along Eads Street



8. View of the two non-paved and unfenced portions of the Property located along Eads Street



9. View of the small unpaved strip that is the eastern portion of the Property with an undeveloped, fenced lot beyond (note minor dumping)



10. View of residential row houses located along Eads Street to the west and south



11. View of the parking lot to the north and the adjacent Benning Liquors store



12. View looking north across Benning Road to the Metro tracks and the PEPCO generating facility



13. View of the rear of Benning Liquors looking east along the alley between the northern and southern portions of the Property



14. View of three adjacent transformers located along Benning Road