



HARRY WALLS ENVIRONMENTAL CONSULTING

December 19, 2013

Mr. Stan Walker
CEO
South Rome Redevelopment Corporation
119 S. Broad Street
Rome, GA 30162

RE: Phase I Environmental Assessment
The Old McCall Hospital, Acquisition and Demolition
310 S. Broad Street and 5 Cherokee Street
Rome, GA
Project No: 2013.53

Dear Mr. Walker:

Harry Walls Environmental Consulting (HWEC) is pleased to submit this report of our Phase I Environmental Assessment for the above-referenced project. The results of the environmental assessment and our comments pertinent to this project are included in the enclosed report. The Phase I Environmental Assessment was performed in substantial conformance with the standards developed by the American Society for Testing and Materials (ASTM) and with the United States Environmental Protection Agency (EPA), "All Appropriate Inquiry" Rules, dated November 1, 2005 (Rules), annotated per DCA's 2013 Environmental Manual requirements. In addition, this assessment was performed to conform with the U.S. Department of Housing and Urban Development (HUD) guidelines referenced in the DCA manual. This report has been prepared for the South Rome Redevelopment Corporation and the Georgia DCA. Any materials referenced or presented herein are, according to HWEC, believed to be accurate and may be relied upon by the above parties.

We appreciate the opportunity to assist you with this project. Please contact us if you have any questions or if we can be of further assistance.

Sincerely

Harry Walls,
Harry Walls Environmental Consulting

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HARRY WALLS ENVIRONMENTAL CONSULTING

**ENVIRONMENTAL CONSULTANT SIGNATURE PAGE FOR
PHASE I**

December 19, 2013

To: Georgia Department of Community Affairs
Atlanta, GA

RE: The Old McCall Hospital, HWEC Project 2013.53

Ladies/Gentlemen:

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

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

December 19, 2013

Date

Harry Walls
Environmental Professional

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitation of 40 CFR Part 312 and ASTM E1527-05 of the Old McCall Hospital Target Property at 310 S Broad and 5 Cherokee Streets, Rome, Floyd County, GA, the Site. Any exceptions of deletions from this practice are described in Section 2.2.2 of this report. We certify that the Phase I was performed by a qualified Environmental Professional meeting the requirements set forth in 40 CFR 312.10(b).

December 19, 2013

Date

Project Manager

December 19, 2013

Date

Principal of Consultant



HARRY WALLS ENVIRONMENTAL CONSULTING

**ENVIRONMENTAL SITE ASSESSMENT
(PHASE I)**

**OLD McCALL HOSPITAL ACQUISITION & DEMOLITION
310 S BROAD STREET & 5 CHEROKEE STREET PARCELS
ROME, FLOYD COUNTY, GA 30165**

**PREPARED FOR:
SOUTH ROME REDEVELOPMENT CORPORATION
119 S. BROAD STREET
ROME, GA 30162**

**JOB # 2013.53
December 19, 2013
Site Reconnaissance on November 14 and 30, 2013**

Table of Contents

1.0	Executive Summary	5
1.1	Location and Legal Description of the Property	5
1.2	Environmental Concerns and Conclusions	5
1.2.1	On-Site	5
1.2.2	Off-Site	6
1.3	Recommendations	6
1.3.1	On-Site	6
1.3.2	Off-Site	6
2.0	Introduction	6
2.1	Background	6
2.2	Procedures	7
2.3	Significant Assumptions	8
2.4	Qualifications of Personnel/Documentation of qualifications as an "Environmental Professional"	9
2.5	Assessment of Specialized Knowledge or Experience of User and/or "Environmental Professional"	9
2.6	Limitations and Exceptions	9
2.7	Special or Additional Conditions or Contract Terms	11
3.0	Site Setting	11
3.1	General Description of the Site and Vicinity	11
3.1.1	Current Site Use and Description	11
3.1.2	Current Uses of Adjoining Properties	11
3.1.3	Description of Structures, Roads, and Other Improvements	12
3.2	Hydrogeology	12
3.2.1	Geologic Setting	12
3.2.2	Surface Drainage	12
3.2.3	Groundwater	12
3.3	Wetlands	13
3.4	Floodplain/Floodway	13
3.4	State Waters	13
3.5	Endangered Species	14
4.0	Regulatory Information	14
4.1	Data Review	14
4.1.1	Standard Environmental Record Sources	14
4.1.2	Additional Environmental Record Sources	17
4.3.1	Current Key Site Manager, Occupants, or Owners of the Property	21
4.3.2	Current Owners or Occupants of Neighboring Properties	21
4.3.3	Past Owners, Occupants, or Operators of the Property	21
5	Site Information And Use	23
5.3	Site Reconnaissance Methodology and Limiting Conditions	23
5.4	General Site Setting	23
5.5	Assessment of Commonly Known/Reasonably Ascertainable Information	23
5.6	Current Site Use	24
5.4.1	Storage Tanks	24

5.4.2	Hazardous and Petroleum Products Containers/Drums	24
5.4.3	Heating and Cooling.....	24
5.4.4	Solid Waste	24
5.4.5	Sewage Disposal/Septic Tanks	24
5.4.6	Hydraulic Equipment.....	24
5.4.7	Contracted Maintenance Services	25
5.4.8	Electrical Equipment/PCBs.....	25
5.4.9	Water Supply and Wells.....	25
5.4.10	Drains and Sumps	25
5.4.11	Pits, Ponds, Lagoons and Surface Water	25
5.4.12	Stressed Vegetation.....	25
5.4.13	Stained Soil or Pavement.....	25
5.4.14	Odors	25
5.4.15	Utilities/Roadway Easements	25
5.4.16	Chemical Use	25
5.4.17	Water Leaks/Mold/Fungi/Microbial Growth.....	26
5.4.18	Asbestos	26
5.4.19	Lead-Based Paint.....	26
5.4.20	Lead In Drinking Water	26
5.4.21	Radon	26
5.4.22	Noise	27
5.4.23	Vapor Encroachment Screening.....	27
5.4.24	Other Site Reconnaissance Issues.....	27
5.5	Past Site Use.....	27
5.5.1	Recorded Land Title Records	28
5.5.2	Environmental Liens	28
5.5.3	Activity and Use Limitations	28
5.5.4	Aerial Photographs and Topographic Maps.....	28
5.5.5	Sanborn Fire Insurance Maps.....	29
5.5.6	City Directories.....	29
5.5.7	Previous Environmental Studies.....	29
5.5.8	Other.....	30
5.6	Current Surrounding Land Use	30
5.6.1	North	30
5.6.2	East.....	30
5.6.3	South	31
5.6.4	West.....	31
5.7	Past Surrounding Land Use	32
5.7.1	North	32
5.7.2	East.....	32
5.7.3	South	32
5.7.4	West.....	32
5.8	Historic Preservation	33
6	Data Gaps	33
6.1	Identification of Data Gaps	33
6.2	Sources of Information Consulted to Address Data Gaps.....	34
6.3	Significance of Data Gaps	34
7	Environmental Concerns.....	35
7.1	On-Site	35

7.2 Off-Site.....	35
8 Conclusions and Recommendations.....	36
8.1 On-Site.....	36
8.2 Off-Site.....	36
9 Data References.....	36
10 Valuation Reduction.....	37
10.1 Purchase Price.....	37
10.2 Interview of Broker Regarding Market Value	37
10.3 Differential between Purchase Price and Market Value.....	38
10.4 Environmental Reasons For Any Differential.....	38
Tables	39
Table 1- Regulatory Agency Review	39
Table 2- Summary of Identified Facilities.....	39
Table 3- Area Reconnaissance Information	39
Table 4- Summary of Potential Data Failures/Gaps	39
Appendices.....	39
Appendix A- Figures and Maps.....	39
Figure 1- USGS Topographic Map	39
Figure 2- USFWS National Wetlands Inventory Map	39
Figure 3- Soil Survey Map.....	39
Figure 4- FEMA Floodplain Map	39
Figure 5- Site Map- Existing Conditions.....	39
Figure 6- Site Map- Proposed Conditions.....	39
Figure 7- Radon Map	39
Appendix B- Photographs	39
Appendix C- Historical Research Documentation	39
1. Historic Aerial Maps.....	39
2. Sanborn Fire Insurance Maps	39
3. Historic Topographic Maps.....	39
4. City Directories	39
Appendix D- Documentation From Title Company/ Title Professional.....	39
1. Recorded Land Title Records.....	39
2. Records of environmental liens and activity and use limitations.....	39
3. Legal Description	39
Appendix E- Non-Scope Testing.....	39
1. Lead-Based Paint.....	40
2. Lead in Soil.....	40
3. Lead in Water.....	40
4. Asbestos	40
5. Radon	40
6. Vapor Encroachment Screening	40
Appendix F- Noise Assessment Documentation	40
1. Noise Assessment Report.....	40
2. Noise Attenuation Plan.....	40
Appendix G- Regulatory Search Information	40
1. Regulated Facilities Radius Map Report	40
2. File Review Documents	40

Appendix H- Record of Communications and Interviews	40
1. User/applicant interview	40
2. Interview of owners and occupants of neighboring properties	40
3. Documentation of attempts to interview:.....	40
Appendix I- Author Credentials, Documentation of Qualifications as an "Environmental Professional"	40
Appendix J- Owner Environmental Questionnaire	40
Appendix K- Property Log and Information Check List	40
Appendix L- Proof of Insurance	40
Appendix M- Letters of Reference	40
Appendix N- Environmental Certification	41
Appendix O- Consumer Confidence Report of Water Quality	41
Appendix P- Endangered Species Documentation	41
Appendix Q- SHPO Review Documentation	41
Appendix R- Additional HOME Requirements	41
1. HOME and HUD Environmental Questionnaire	41
2. HOME and HUD Questionnaire supporting documentation.....	41
3. 8-Step process for floodplains and wetlands.....	41
Appendix S- Operation and Maintenance Manual	41
Appendix T- Previous Environmental Reports	41
1. Previous Phase I.....	41
2. Previous Phase II Reports	41

1.0 Executive Summary

Harry Walls Environmental Consulting (HWEC) has conducted a Phase I Environmental Site Assessment (ESA) of the Old McCall Hospital property, located at 310 S. Broad Street and the adjacent vacant parcel, 5 Cherokee Street, in Rome, GA, which will be called the target property for the remainder of this report. This ESA has been completed in conformity with ASTM E 1527.05 and HUD and GA DCA guidelines of 2013.

1.1 Location and Legal Description of the Property

A Phase I ESA has been completed on the target Property located at 310 S. Broad Street and 5 Cherokee Street, Rome, Floyd County, Georgia. The property consists of .98 acres, located in Rome, Floyd County, Georgia. The text provides detailed discussion of the items summarized below. Exhibit D contains the legal description.

1.2 Environmental Concerns and Conclusions

The Phase I ESA included document research, interviews and site review. The results of the site inspection, research, and analysis are provided below:

1.2.1 On-Site

The target property consists of two tracts of land totaling .98 acres developed with one vacant structure (the Old McCall Hospital), which dates back to 1927. The structure was also used recently for affordable housing units, but as previously stated, is now vacant.

No visual evidence of REC's was observed during our site reconnaissance on the target property such as stained soils, stressed vegetation, land filling, or illegal disposal of hazardous substances.

Lead in soil testing due to structure constructed before 1978, will need to be undertaken but the user has elected to wait until just before demolition.

Lead based paint survey and asbestos survey on the Old McCall Hospital structure will need to be undertaken before demolition as the User has elected not include the studies in this ESA.

Lead in soil testing due to structure will need to be undertaken if the structural lead-based testing indicates levels above the State threshold levels

Based on the results of the Noise Assessment Report, a noise attenuation plan is required prior to the redevelopment for noise sensitive uses as residential units. The attenuation used will depend on the site design of the development. See Appendix F, Section 1.

Based on the site review conducted on November 14, 2013, there are no flood hazard areas, wetlands, or state waters requiring mitigation at the target site.

1.2.2 Off-Site

The Project Site is immediately bounded by roads and structures. There are 17 off-site listed, regulated and historic facilities within the prescribed search distances from the Project Site.

Based on information reviewed, topography, and distance, it is the opinion of HWEC that none of the 17 identified facilities represents a recognized environmental concern (REC) to the target property.

1.3 Recommendations

1.3.1 On-Site

HWEC has performed a Phase I Environmental Assessment for the Project Site. The Phase I Assessment is in substantial conformance with the scope and limitations of ASTM Practice E 1527-05 and with the environmental guidelines that were established in 2013 by DCA. Based on this assessment, data research, site review and investigation, there are no on-site REC's except for the presence of asbestos and lead-based paint in the old McCall Hospital structure.

1.3.2 Off-Site

Based on information reviewed, topography, and/or distance, HWEC is of the opinion that the 18 off-site facilities do not represent REC's to the Target Property.

2.0 Introduction

2.1 Background

HWEC was retained by the South Rome Development Authority, through the City of Rome, GA Community Development Department, to conduct a Phase I Environmental Site Assessment of the Target Property. This ESA was conducted with the understanding that the Target Property is to be purchased, structures demolished and the property developed as affordable housing. The purpose of this ESA is to determine whether the property is environmental acceptable for

multifamily housing, and whether there is evidence of REC's on or adjacent to the Target Property, which could pose environmental liability to the Target Property. The purpose of this ESA is to satisfy one of the requirements to qualify for the bona fide prospective purchaser limitations on CERCLA liability, innocent landowner protection, and the contiguous property owner protection.

The intent is to identify conditions indicative of releases and threatened releases of hazardous substances on, at, in, or to the property, and to conduct all appropriate inquiry into the previous ownership and uses of the property. The procedure used substantially followed the methodology developed by the American Society for Testing and Materials (ASTM) Practice E 1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, the All Appropriate Inquiry (AAI) Rules, 40 CFR 312, annotated per the DCA Environmental Manual requirements. The ASTM approach constitutes a limited, but commercially prudent and reasonable inquiry. This assessment was performed to identify environmental concerns that may be discerned by visual observation and data-gathering procedures.

2.2 Procedures

The general procedures, scope of services, deviations, HWEC's qualifications, and the limitations are included in the following sections of this report, and include:

- *Research of readily available Federal and State environmental agency records for evidence of hazardous substances or related activities on or near the Target Property;
- *Review of historic maps and aerial photographs to assess area history and past use of the Target Property;
- *Review of the Floyd County title records for evidence of hazardous waste liens, land uses, or other environmental concerns pertaining to the Target Property as provided by the client;
- *Reconnaissance of the Target Property and surrounding area, focused on environmental factors;
- *Interviews with residents near the Target Property to assess past and present activities, which may have impacted the Target Property;
- *Interviews with government agencies (as stipulated by GA DCA), including local fire and health officials as possible;

*Assess for potential vapor intrusion risk, including a tier one screening per the ASTM Standard for "Vapor Encroachment Screenings on Property Involved in Real Estate Transactions," E2600-10;

*Completion of the DCA Environmental Review Documentation Information checklist and review of the Owner Environmental Questionnaire and Disclosure Statement, and

*Preparation of this report to document the results of the site reconnaissance, historical and regulatory research and interviews, and to provide HWEC's professional opinion of the environmental condition of the Target Property;

The Phase I ESA was performed to substantially meet the requirements of ASTM for such investigations. The technical requirements of the ASTM standard, revised in the year 2005, were followed. Deviations made from the ASTM standard include use of the DCA-mandated format and review of certain non-scope, DCA-mandated factors.

2.3 Significant Assumptions

This ESA was based on the following significant assumptions in the preparation of this report:

- Site Use- This ESA was conducted for a DCA NSP2 project, the scope of which is the acquisition of the target property and the demolition of the structures on the property.
- Groundwater Flow Direction- The groundwater flow direction in the target property area has been calculated based on the topography of the area, proximity of nearby bodies of water, and the review of the current USGS topographic map.
- Regulatory Records Information- It is assumed that the data provided by Environmental Data Resources, Inc. (EDR) regarding the regulatory status of the facilities within the minimum search distances is current, complete and accurate.
- Data Gaps- Only the identified significant data gaps affect the ESA.

- Other- This ESA is also based on all information provided through interviews of pertinent agencies, occupants, users, and persons familiar with the property being complete and unbiased.

These limitations are referred to in the ASTM Standard as assumptions. They form part of the basis for the ESA performed for this target property. If any of these items are not accurate, HWEC must be so informed so appropriate re-assessment can be performed.

2.4 Qualifications of Personnel/Documentation of qualifications as an "Environmental Professional"

HWEC has been involved in the environmental review process since NEPA was enacted in 1969 and have been involved with Phase I ESA's since the inception. As an Environmental Specialist with HUD since 1967 and then an Environmental Consultant since his retirement from HUD in 2006, Harry Walls the founder of HWEC has been involved in hundreds of these documents, either as a preparer or a reviewer of ESA's prepared by others. In addition, Jonathan Walls has been involved (both research and field work) with both NEPA Environmental Reviews and Phase I ESA's since 2006. Resumes of those performing this ESA are included in Appendix H. Letters of reference are included in Appendix O. Neither HWEC nor the environmental professional (EP) is associated with the Owner/developer or a buyer or seller of the target property.

2.5 Assessment of Specialized Knowledge or Experience of User and/or "Environmental Professional"

The DCA User Questionnaire was provided by the client and indicated that the client did not have specialized knowledge of the Target Property.

During completion of this Phase I ESA, the EP conducted a field review of the subject property (including building interiors), a visual review of the adjoining properties, reviewed the regulatory database report, and reviewed the results of the interviews from these sources. The EP had no specialized knowledge of the Subject Property or surrounding properties.

2.6 Limitations and Exceptions

HWEC has performed appropriate inquiry for this Phase I ESA in substantial conformance with the scope and limitations of ASTM Practice E 1527-05 and according to the DCA NSP guidelines. The Phase I ESA was also written for the benefit of DCA, HUD, and GHFA, which may rely on this report in deciding whether to make the requested NSP2 grant on the property involved.

No ESA can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a site. HWEC's ESA is based on a visual evaluation of the surface conditions only. No other warranty or guarantees expressed or implied. This report must be considered in its entirety.

This report is for the exclusive use of the South Rome Development Authority, the City of Rome, DCA, and GHFA and may be used only in reference to the project or site described herein. HWEC is not affiliated with the owner/developer or a buyer or seller of the subject property. HWEC's conclusions, opinions, and suggestions have been prepared, using generally accepted standards prevailing within the relevant disciplines as practiced within the United States. Nothing contained within this report is intended to supersede or replace the judgment of the Client. All decisions relating to the aforementioned project or site are the sole responsibility of the user(s).

The right to rely upon this report and the data herein may not be assigned without the express written permission of HWEC. As a prerequisite for the granting of such permission, the third-party users (including, but not limited to, the Client's successors and assigns) must agree to be bound by the terms and conditions of the original agreement between HWEC and the Client. Further, reliance is dependent on similar uses of the property and the document.

HWEC's conclusions, opinions and suggestions are based upon the information furnished and reviewed, including governmental records, as well as HWEC's professional experience. This ESA may not detect or account for all conditions or factors present at a project area or Project Site. Such unexpected conditions or factors become manifest during subsequent activities at a site, it will be necessary for HWEC to review and re-evaluate any and all conclusions, opinions and suggestions made with respect to this project or Project Site. Accordingly, HWEC should be contacted immediately in this case.

Should there be any subsequent changes or additions to the project or Project Site information provided to HWEC in connection with the preparation of this report, the contents of this report must be considered invalid unless such changes or additions are reviewed by HWEC and the associated conclusions, opinions and suggestions are either verified or modified in writing. HWEC should also be consulted concerning any future work to be performed in connection with the project or Project Site so that we can determine whether such work is consistent with our conclusions, opinions and suggestions.

2.7 Special or Additional Conditions or Contract Terms

The terms and conditions for this Phase I ESA were set forth in HWEC's proposal, which was executed by the client.

3.0 Site Setting

3.1 General Description of the Site and Vicinity

The Subject property is referenced by the addresses of 310 South Broad Street and 5 Cherokee Street, Rome, Floyd County, GA. The two parcels are adjacent. The two parcels total .98 acres. The 310 South Broad Street parcel is developed with the Old McCall Hospital structure and an outbuilding stated to have been used as parking for the hospital's ambulances. The adjacent 5 Cherokee Street parcel is vacant but did at one time contain a single-family house. The undeveloped portion of the 310 South Broad parcel is a combination of an old concrete drive, gravel and dirt. The vacant parcel at 5 Cherokee Street is mainly soil. Single family housing to the east, south, west and north bound the subject site. Immediately to the north of the Old McCall Hospital parcel is a small shopping area, which is currently in use. There is also a homeless facility just to the southwest of the subject property.

Project boundary data is included as Figure 5 of Appendix A. A copy of the legal description is located in Appendix D.

3.1.1 Current Site Use and Description

A site review was conducted on November 14, 2013. At time of visit, the developed parcel on South Broad Street had the old vacant McCall Hospital structure, which are two stories with a basement. On the same parcel is an outbuilding, which was used to park the ambulances. The adjacent 5 Cherokee Street parcel was vacant. As stated previously, in addition to the structures, the target property was covered with old pavement, dirt, and grass. In addition to a site review of the exterior areas, the interior of the hospital, as well as the old ambulance garage was examined.

3.1.2 Current Uses of Adjoining Properties

The target property is bounded by roads, residential structures, a small commercial shopping area to the north, an old service station (converted to a residential structure) to the east and a homeless facility to the southwest.

3.1.3 Description of Structures, Roads, and Other Improvements

At the time of the site visit, the target property had two structures-the old McCall Hospital and the old ambulance garage. West Forest Street bounded the property to the south; South Broad Street to the East; and Cherokee Street to the North. As previously stated, the remainder of the target property consisted of pavement, dirt and grass.

3.2 Hydrogeology

3.2.1 Geologic Setting

The control of the migration of released chemicals from a site or facility is normally controlled by the topography, geology and hydrogeology of the area. The relative location of the properties will often define their potential interaction and hydraulic connection. The description of the physical setting for the subject property is provided below, starting with the topography and geology. The estimated surface water and groundwater flow directions are then estimated and described.

According to the EDR data, the rock stratigraphic unit is Paleozoic Era, Cambrian System and Cambrian Series.

3.2.2 Surface Drainage

Topography in the area of the Target Property generally slopes toward the north with the highest elevations located to the south of the Target Property. Surface water flow from the property is to the northeast toward storm water drains located throughout the area. Appendix A shows the topography of the Target Property and the surrounding area.

3.2.3 Groundwater

Groundwater in this region is contained in joints, fractures and other openings in bedrock and the pore spaces in the overlying residual soil. Groundwater recharge occurs by seepage of water through the soil and/or rock or by flowing directly into openings in outcropping rock. The primary source of recharge water is from precipitation that falls in the area, but can also originate from river discharge during dry periods. The movement of groundwater typically follows the original surface topography. In this type of

geologic setting, the direction of groundwater flow can be anticipated to generally conform to that of the surface water.

Based on the USGS topographic map of the area, groundwater below the Target Property is anticipated to flow generally northeast. Areas considered up gradient of the site are to the south and southwest of the Target Property, depending on location. This anticipated direction of groundwater flow was used to assist in the evaluation of potential impacts from nearby properties.

3.3 Wetlands

Review of the U.S. Fish & Wildlife National Wetlands Inventory map did not indicate any wetlands on or adjacent to the Target Property, see Figure 2. The nearest wetland is the Etowah River to the east and which does not impact the Target Property.

During the site inspection on November 14, 2013, no streams or wetland areas were observed on the Target Property.

A review of the soils data (EDR) for the Target Property indicates the dominant soil composition in the general area in Montevallo, which is "channery-silt loam" which is well drained. Also this type soil does not meet the requirements for a hydric (wetland) soil. A copy of the soil map is included as Appendix A.

3.4 Floodplain/Floodway

The Target Property is located within the FEMA Flood Insurance Rate Map (Community Panel No. 13115C0281E). The Target Property is not located in a FEMA flood hazard area as defined by FEMA and which would require further action. A copy of the FEMA Map is included as Figure 4 of this ESA.

3.4 State Waters

HWEC's investigation of the Target Property was conducted to identify areas that would meet the definition for state waters, as defined in the Official Code of Georgia Annotated (OCGA) Volume 10, 12-7-3: Definitions, (13) "State Waters" and interpreted by the Georgia Environmental Protection Division (EPD). According to the current EPD rules concerning state waters and buffers, a stream feature must contain 'normal stream flow' (which has been

interpreted to mean 'base flow') in order to be subject to the buffer requirements. Based on HWEC's investigation, there is no state waters requiring a buffer located on the Target Property.

3.5 Endangered Species

The Target Property is located in an urban setting that has had development in the area for well over 100 years. The 310 South Broad Street parcel is almost completely covered by the McCall Hospital and the associated old ambulance garage. The adjacent 5 Cherokee Street parcel previously was developed for many years with a single-family property, which was recently demolished. Due to this and verified by the site visit on November 14, 2013, there are no endangered species at the Target Property mainly because there is no habitat, per the U.S. Fish & Wildlife Service definition, for the existence of endangered species, whether flora or fauna.

It is not anticipated that the proposed demolition and future redevelopment of the Target Property would impact species protected under the Endangered Species Act.

4.0 Regulatory Information

4.1 Data Review

4.1.1 Standard Environmental Record Sources

Federal and State environmental agency records were reviewed for evidence of regulated or investigated facilities within the minimum search distances outlined by ASTM E 1527-05 and 40 CFR Part 312. The search distances are for the Target Property, adjoining properties, property within 0.5 mile, or property within 1.0 mile.

HWEC used a commercial database reporting company (Environmental Data Resources, Inc., or EDR) to provide Federal, State, and Tribal environmental records. The search was conducted by selecting a center point within the interior of the Target Property and then expanding the search distances (in ¼ -mile increments) as necessary based on the distance from the center point to the furthest Target Property boundary. Therefore, some facilities may appear within the database report that is actually beyond the required search distances. HWEC field staff located the listed facilities and only those facilities confirmed to be within the respective ASTM or AAI (All Appropriate Inquiry) search distances are referenced in this ESA. A copy of the database report used for the regulatory agency review is included in Appendix G. The facilities identified and search records reviewed are listed in Table I.

TABLE 1: REGULATORY DATABASES

DATABASE	NUMBER AT PROJECT SITE	NUMBER WITHIN SEARCH RADII
<i>SEARCH DISTANCE: 1-MILE</i>		
United States Environmental Protection Agency (US EPA) National Priority List (NPL)	0	0
US EPA CORRACTS database	0	0
Georgia Environmental Protection Division (EPD) Hazardous Site Inventory (HSI), also referred to as the State Priority (SPL) or State Hazardous Waste Sites (SHWS)	0	0
State equivalent CERCLIS database (SCL), also referred to as Non-HSI	0	4
<i>SEARCH DISTANCE: 1/2- MILE</i>		
U.S. Tribal Records (Indian Reservations)	0	0
U.S. Tribal LUST Records (Indian LUST)	0	0
Georgia Brownfield's Public Records List (BROWNSFIELDS)	0	0
US EPA Resource Conservation and Recovery Act - Treatment, Storage and Disposal (RCRA TSD) Facilities List	0	0
US EPA Brownfield's (US BROWNSFIELDS)	0	0
US EPA Comprehensive Environmental Response, Compensations, and Liability Information System (CERCLIS) database	0	1
US EPA CERCLIS, No Further Remedial Action Planned (NFRAP) database	0	0
Georgia Leaking UST List (LUST)	0	6
Georgia EPD Operating Solid Waste Facilities List (SWFL)	0	1
Drycleaners	0	0
Delisted National Priority List (Delisted NPL)	0	0
<i>SEARCH DISTANCE: ¼ - MILE</i>		
US EPA Toxic Release Inventory database (TRIS)	0	0
US EPA Facility Index System (FINDS)	0	0
<i>SEARCH DISTANCE: PROPERTY AND ADJACENT PRPERTY</i>		
US EPA RCRA Program Generators database (RCRA)	0	0
Georgia EPD Registered Underground Storage Tanks (UST) List	0	2
US DOT Hazardous Materials Information Reporting System (HMIRS)	0	0
US EPA Emergency Response Network System (ERNS)	0	0
Georgia SPILLS list	0	0
Federally Institutional Control / Engineering Control Registries	0	0
State and Tribal Institutional Control Registries	0	0

<i>NON-ASTM</i>		
DOD, Department of Defense	0	0
EDR Proprietary Historical Database (Historical)	0	2

Sites Listed in Section 8.2.1 of ASTM E 1527-05 and in Exhibit B1

The Target Property was not on any of the facility lists. A discussion of the regulated or identified facilities that may have an impact to the Target Property is provided in Sections 4.1.1.1 and 4.1.1.2. A summary of 14 listed, regulated facilities within applicable search distances of the Target Property including facility name, facility address, program, proximity, direction, apparent hydraulic direction are provided below in Table 2.

4.1.1.1 Orphan/Unmappable Sites

The regulatory database report includes a list (Orphan List) of facilities that could not be mapped due to poor or incomplete address information. HVEC reviewed this list, which included 20 orphan facilities, to determine if the Orphan Facilities were located within the respective search distances from the Target Property. Based on HVEC's map review and field review, the 20 orphan facilities were not located within the DCA, ASTM, or AAI distances from the Target Property.

No other additional notable facilities were observed during the visit of November 14, 2013.

TABLE 2: SUMMARY OF IDENTIFIED FACILITIES

Facility & Address	Program	Proximity & Direction	Apparent Hydraulic Relation	REC, Y/N
Rome Coal Tar Pits JCT. Broad St. & 2 nd Ave.	CERCLIS and Consent	2230 feet NNE	Topographically Separated	N
Rome MFG Co. 102 W. 2 nd Ave	State EQ, CERCLIS	2230 feet NNE	Topographically Separated	N
Spears Mattress Co. 103 E.12 th St.	State EQ, CERCLIS	3510 feet SSE	Topographically Separated	N
Davenport Coal Tar Pit 102 nd Ave.	State EQ, CERCLIS	2354 feet NNE	Topographically Separated	N
Rome/ Floyd Park & Rec	State EQ, CERCLIS	3424 feet NNE	Topographically Separated	N

300 W 3 rd St.				
Centerville Sanitation Inc. 4 E. Third St	State Landfill	1013 feet ENE	Topographically Separated	N
Southeastern Mills 100 E. First Ave	State LUST	1699 feet NE	Topographically Separated	N
Big H Food Store 29 E. Main St.	State LUST	1800 feet SSW	Topographically Separated	N
Atlanta Gaslight Co. 100 W. First St.	State LUST	2047 feet NNE	Topographically Separated	N
Unknown	State LUST	2050 feet NNE	Topographically Separated	N
SunTrust Bank 300 E. 2 nd Ave.	State LUST	2086 feet ENE	Topographically Separated	N
Riddle Copiers 419 2 nd Ave.	State LUST	2328 feet ENE	Topographically Separated	N
Chucks Corner 200 S. Broad St	State UST	850 feet N	Topographically Separated	N
South Broad Minimart 410 S. Broad St.	State UST	340 feet SSE	In Compliance	N

4.1.2 Additional Environmental Record Sources

The following information was utilized to enhance and supplement the standard environmental record sources. A reasonable attempt was made to obtain the additional environmental records. A brief description including date of contact, contact information, and database is indicated below.

4.1.2.1 Local Brownfield Lists

At the time that this ESA research was conducted, no local Brownfield lists existed according to the Community Development Department of the City of Rome. For lists of Brownfield Properties, refer to the state list in the EDR report, which is found in Appendix G.1.

4.1.2.2 Local Lists of Landfill/Solid Waste Disposal Sites

HWEC reviewed information for old/current landfills reported by the EPD Land Protection Branch. The only data is that included in the EDR Regulatory Search

Report found in Appendix G.1. The landfill reported as "State Landfill" is the Centerville Sanitation, Inc., located at 4 E. Third Street. It is located 1013 feet ENE of the Subject Property and is not considered an REC.

4.1.2.3 Local Lists of Hazardous Waste/Contaminated Sites

No local lists of hazardous waste/contaminated sites exist for the City, according to the City of Rome Community Development Department and the City of Rome Fire Department. For lists of hazardous waste or contaminated sites, refer to HIS, Non-HIS, and VCP lists in the EDR report, which is found in Appendix G.1.

4.1.2.4 Local Lists of Registered Storage Tanks

There are no locally maintained lists of registered storage tanks, according to the City of Rome Community Development Department and the Rome Fire Department. The EPD list was reviewed as printed in the EDR report, which is found in Appendix G.1.

4.1.2.5 Local Land Records (for activity and use limitations)

HWEC has reviewed the Rome/Floyd County website to research local land records for activity and use limitations in proximity of the Target Property. No pertinent environmental records were found during the search.

4.1.2.6 Records of Emergency Release Reports

Based on contacts with the Rome Fire Department, it is known that no local records of Emergency Release Reports are maintained. However Mr. Gary Garland, Fire Prevention Officer, of the Rome Fire Department stated by phone on December 11, 2013 that there is no record for any releases at the Target Property.

4.1.2.7 Records of Contaminated Public Wells

Based on contact with the Rome Fire Department on December 11, 2013 and checking with the Georgia EPD, there are no records of contaminated public wells within the proximity of the Target Property.

4.1.2.8 Planning Department Records

The City of Rome Planning and Zoning Department was contacted (Ms. Sue Hiller by phone on December 11, 2013) as to any zoning or land use conflicts with the Target Property. There has been no adverse land use situations associated with the Target Property.

4.1.2.9 Local/Regional Pollution Control Agency Records

According to the Community Development Department, Rome Fire Department, Rome Planning & Zoning Departments and others, there are no local Pollution Control Records. The Georgia EPD website was researched also and no information was found that was adverse to the Target Property.

4.1.2.10 Local/Regional Water Quality Agency Records

The City of Rome has two surface water intakes, the Oostanaula River (formed by the Consauga and Coosawattee Rivers) and the Etowah River. Any contaminants, if present, are removed by the water treatment process at the Bruce Hamler Water Treatment Facility. A copy of the 2012 Rome, Georgia Water Quality Report is included in Appendix O.

4.1.2.11 Local Electric Utility Company

HWEC attempted to contacted the Georgia Power Company regarding a history of transformers labeled as containing PCB's at the site, but there was no returned call regarding this. The site visit did reveal pole-mounted transformers along Cherokee, S. Broad, and West Forest Streets. However, they all appeared to be in good condition and with no apparent leakage and no evidence that there are any PCB's present and impacting the Target Property.

4.1.2.12 Other

The Northwest Georgia Housing Authority (several times due to other work done for them) and the Northwest Georgia Regional Commission (Michael Miller by phone on December 12, 2013) were also contacted regarding the Target Property. To the knowledge of both sources, there is no knowledge of any adverse environmental conditions at the Target Property. No other local County or City Agencies were contacted to obtain Additional Record Sources

4.2 Agency Contacts/Records

State and local government officials who may have been familiar with the Target Property were contacted. These persons were questioned as to their knowledge of any past activities at the Target Property that might present the potential for environmental impacts. Documentation of these contacts/interviews is included as Appendix H. The interviews provided the following information:

4.2.1 Local Fire Department Official

HWEC contacted Mr. Gary Garland, Fire Prevention Officer, with the Rome Fire Department by phone on December 11, 2013. To Mr. Garlands' knowledge there are no hazardous spills, hazardous storage or any other such adverse environmental conditions. There was a natural gas leak in 2001 and there have been several false alarms from the property according to Mr. Garland but he considered them of no ongoing adverse environmental situation.

4.2.2 The local Environmental Agency

There is no local Environmental Agency, but the data obtained from the other local agencies (Community Development, Building Department, Fire Department, Planning/Zoning Department, Northwest Georgia Regional Commission) provided much data regarding environmental matters.

4.2.3 Local Building Permit Agency Official

Mr. Howard Gibson of the Rome Building Department was contacted by phone on December 12, 2013. Mr. Gibson had been with the Department for over 30 years and is very familiar with the Target Property. He said there had been many issues associated with the Target Property. There has been flooding, with the presence of sewage in the basement of the old McCall Hospital, there has been numerous building code violations with the old McCall Hospital, and other such violations. However no adverse environmental conditions as spills or hazardous storage was discussed.

4.2.4 Local Groundwater Use Permit Agency Official

The local

4.3 Interviews

During and following the site review, interviews were conducted with persons familiar with the Target Property. These persons were questioned as to their knowledge of any past activities at the Target Property that might present the potential for environmental impacts. Documentation of the interviews is included as Appendix H. The interviews provided the following information.

4.3.1 Current Key Site Manager, Occupants, or Owners of the Property

The current owner of the property, Mr. Ron Morris, an officer with the Floyd County Sheriff's Department accompanied HWEK staff, Harry and Peggy Walls, with the site review. During the review of the interior and exterior of the Target Property, Mr. Morris was interviewed (questioned) about numerous environmental factors. To his knowledge, Mr. Morris was unaware of any spills or contaminants stored at the property. He pointed out a boiler room in the basement that was flooded. To his knowledge the boiler room never has contained any contaminants. Mr. Morris as the owner completed the DCA Owner's Questionnaire, which is located in Appendix J.

4.3.2 Current Owners or Occupants of Neighboring Properties

Mr. Ron Morris is also the owner of the strip shopping area located just north of the Old McCall Hospital and in the same block. Thus the comments as to environmental factors for the previous section also apply to this section.

4.3.3 Past Owners, Occupants, or Operators of the Property

Past owners and occupants of the Subject Property were not interviewed because the contact information was not available.

4.3.4 User(s)

The Users of the report were identified as, the South Rome Development Corporation and the North West Georgia Regional Commission (applicant).

4.3.4.1 Title Records

HWEC performed a search of the deeds for the 2 parcels composing the property. The deed information and property descriptions are found in Appendix D.1.

4.3.4.2 Environmental Liens

The client indicated that they were unaware of environmental liens associated with the Target Property. The EDR Environmental Lien and AUL Search data did not indicate any environmental liens and is included as Appendix D.2.

4.3.4.3 Specialized Knowledge of the User

The client was not aware of any environmental problems with the Target Property other than the probability of lead-based paint and asbestos in the Old McCall Hospital structure.

4.3.4.4 Commonly Known/Reasonably Ascertainable Information

The client indicated that they were unaware of any commonly known information of environmental significance with respect to the Target Property other than the previously mentioned probability of lead-based paint and asbestos in the Old McCall Hospital structure. HWEC also conducted interviews with local residents during the area review in an attempt to obtain commonly known information concerning the Target Property. Details of the interviews performed are included in Section 4.3.2 of this Phase I ESA.

4.3.4.5 Reason for Performing the Phase I

This Phase I ESA Environmental Assessment was conducted with the understanding that it was prepared for the client because it is one of the Georgia DCA's requirements for funding.

4.3.4.6 Relationship of Purchase Price to Fair Market Value

The client indicated the property is priced at fair market price after an appraisal.

4.3.4.6.1 Purchase Price

Based on the User supplied information, the price of the Subject Property represents fair market value.

4.3.4.6.2 Differential Between Purchase Price and Market Value

Not applicable.

4.3.4.6.3 Reasons For Any Differential

Not applicable.

5 Site Information And Use

5.3 Site Reconnaissance Methodology and Limiting Conditions

A review of this Target Property was performed on November 14, 2013 to look for evidence of possible hazardous substance contamination at the site. The reconnaissance consisted of an on-site, visual review by Harry Walls and Peggy Walls of HWEC. The reconnaissance was performed by walking through the Old McCall Hospital structure with Mr. Ron Morris, the present owner of the Target Property. Also Mr. Morris accompanied the HWEC staff of a walk over the exterior of the Target Property. After the on-site review, only the two HWEC staff, by auto, reviewed the site boundaries and checked on other EDR listed facilities that were in the area.

5.4 General Site Setting

The Target Property is generally bounded by S. Broad Street to the East, W. Forrest Street to the South and Cherokee Street to the North.

5.5 Assessment of Commonly Known/Reasonably Ascertainable Information

The client indicated that there is probability of lead-based paint and asbestos associated with the old McCall Hospital structure. In addition the client as well as others interviewed had heard that there was a tank, probably for fuel oil storage, below the hospital structure at the southern boundary. However, the EDR data,

which provides data of possible REC's (including lists of UST's) , both on and off site did not provide any data on such.

5.6 Current Site Use

The Target Property consists of two tracts of land, the 5 Cherokee Street property consists of .496 acres and the 310 S. Broad Street property (McCall Hospital) consists of .483 acres, both totaling .979 acres. The 5 Cherokee Street is vacant and the 310 S. Broad Street property contains the old McCall Hospital and a small out building said to have been a garage for hospital ambulances, though it is only large enough to have contained two vehicles. Photographs of the Target Property are included in Appendix B.

5.4.1 Storage Tanks

No AST's were observed on the Target Property. There were no features indicative of UST's , such as fill caps, vent pipes, pump islands, or associated piping were observed at the site. Also EDR radius records do not indicate any tanks on the site.

5.4.2 Hazardous and Petroleum Products Containers/Drums

No drums or large containers were observed on the Target Property.

5.4.3 Heating and Cooling

The old Hospital had heating and cooling systems. The boiler room, located in the basement on the Forrest Street side of the hospital, was completely flooded up to the first step going into the basement and was not accessible.

5.4.4 Solid Waste

No solid waste was observed on the Target Property.

5.4.5 Sewage Disposal/Septic Tanks

The City of Rome handles the sewage service in the area of the Target Property. No septic tanks were reportedly located on the Target Property.

5.4.6 Hydraulic Equipment

No hydraulic equipment was observed on the Target Property. The Old McCall Hospital did not contain elevators.

5.4.7 Contracted Maintenance Services

No maintenance service is contracted on the Target Property.

5.4.8 Electrical Equipment/PCBs

Pole mounted transformers were located along the streets (S. Broad, Cherokee, and West Forrest) surrounding the Target Property. No transformers were observed on the Target Property.

5.4.9 Water Supply and Wells

The City of Rome supplies water to the area of the Target Property. The City of Rome's water quality report is included in Appendix O. No drinking wells were observed on the Target Property.

5.4.10 Drains and Sumps

No drains or sumps were observed on the Target Property.

5.4.11 Pits, Ponds, Lagoons and Surface Water

No pits, ponds, or lagoons were observed on the Target Property during the site review. No surface water bodies are located on the Target Property.

5.4.12 Stressed Vegetation

No stressed vegetation was observed during the site visit.

5.4.13 Stained Soil or Pavement

No stained soil or pavement was observed on site during the on site visit.

5.4.14 Odors

No unusual odors were observed on the Target Property.

5.4.15 Utilities/Roadway Easements

Utilities were present along the streets surrounding the Target Property; however, easements, if any, associated with the utilities were not easily identifiable.

5.4.16 Chemical Use

No chemical use was observed on the Target Property during the November 14, 2013 site visit.

5.4.17 Water Leaks/Mold/Fungi/Microbial Growth

The structure on the Target Property is planned to be demolished; therefore, water leaks, mold, and fungi/microbial growth are not applicable.

5.4.18 Asbestos

The Client/User has elected to wait until before a demolition contract RFP is published to address the asbestos issue. As asbestos is a non-scope item under ASTM 1527-05 protocol, this ESA will not include such study, but will condition the conclusions and findings to require one before demolition in order that a potential REC will be properly addressed. This will also be noted in Appendix E.3.

5.4.19 Lead-Based Paint

Because of the age (pre 1978) of the two structures on the Target Property, it is very likely that lead-based paint is present. However, the client/user has elected to wait until before the RFP is issued for the demolition work to conduct a structural, as well as a lead in soil study. As lead-based paint is a non-scope item under ASTM 1527-05 protocol, this ESA will not include such study, but will condition the conclusions and findings to require one before demolition in order that a potential REC will be properly addressed. Appendix E.1 and E.2 note this decision by the client/user.

5.4.20 Lead in Drinking Water

The structure on the Target Property is planned to be demolished, therefore, water samples from the structure for analysis of lead are not required. HWEC staff reviewed the City of Rome, 2012 Water Quality Report and find the Target Property area has a safe quality of water to drink. The Water Quality Report is included in the ESA as Appendix O.

5.4.21 Radon

HWEC performed a review of data (including that obtained from EDR and discussed in Appendix G, the Radius Search) for radon. Based on a review of the United States EPA's Map (included as Appendix E.5) of Radon Zones for Georgia, Floyd County, Rome/Floyd County is located in Zone 2, moderate with indoor average level of exposure at <4 picocuries per liter (pCi/L of 89% of homes tested) to 4-20 pCi/L (11% of homes tested). There were no homes tested in the range of >20 pCi/L. With zone 2 levels, all residential structures constructed must include radon-resistant construction techniques and materials.

5.4.22 Noise

A noise assessment, using the HUD on-line noise calculator, was conducted for the Target Property. Only one noise assessment location (NAL) was chosen which was at the old McCall Hospital and on the east side, the nearest point to S. Broad Street, which was the major noise source impacting the Target Property. As the exterior noise level at that NAL, which was 70 feet from the centerline of South Broad Street was 69.96 DNL, it is recommended the noise assessment be revisited when a redevelopment plan has been prepared and prior to development. This is necessary to ensure there is a noise mitigation plan for the Target Property redevelopment to meet DCA noise regulations and that the interior residential use areas are less than 45 DNL and that the exterior noise level does not exceed 65 DNL at the location of proposed outside use areas.

The noise study is included as Appendix F.1.

5.4.23 Vapor Encroachment Screening

The purpose of the screening was to assess for potential vapor intrusion risks, which could impact buildings at the Target Property. A tier I screening was conducted and is included as Appendix F. The tier 1 screening had 4 sites that are within the search distance. After conducting the screening, 3 sites (the Centerville Sanitation, Inc., the Southeastern Mills, and the 309 S. Broad Street) sites were eliminated as a possible REC due to being at a lower elevation and based on the USGS topo map are down gradient from the Target Property. The fourth site of concern, the currently operating service station at 410 S. Broad Street, while at a 6 feet higher elevation is cross gradient after reviewing the USGS topo map. Thus the Target Property should not be impacted by Vapor Encroachment.

5.4.24 Other Site Reconnaissance Issues

No other site review issues were observed during the site visit. No visual evidence of REC's at the Subject Property such as stained soils or stressed vegetation was identified during HWEC's site review.

5.5 Past Site Use

Historical research into the Target Project was conducted to assess the history of the Target Property and surrounding areas from an environmental perspective. This research included reviewing USGS topographic maps, Sanborn fire insurance maps, city directories, and aerial photographs, conducting interviews with people familiar with the history of the Target Property and surrounding areas, and

researching chain of title information to determine the past ownership of the Target Property. The title review focused on determining whether past ownership included industrial firms, and whether environmental liens encumber title to the Target Property. The following sections summarize the results of the historical research of the Target Property:

5.5.1 Recorded Land Title Records

HWEC staff researched the chain of title research from local records and the data supplied by the data search of EDR. The Target Property is composed of two parcels, which are owned by Mr. Ron Morris. Previous owners included private owners, and the hospital owners. Based on this research, no names were identified that based on name would represent an environmental concern. A copy of this information is included in Appendix D.1.

5.5.2 Environmental Liens

HWEC performed chain-of title research and does not note any environmental liens or activity /use limitation was found to be associated with the two parcels researched. Also the Environmental Lien data supplied by EDR did not indicate any liens or use limitation for the two properties. This data is included in Appendix D.2.

5.5.3 Activity and Use Limitations

HWEC performed chain-of-title research and finds there are no environmental liens or activity/use limitations were found to be associated with the two parcels researched. This information is included in Appendix D.2.

5.5.4 Aerial Photographs and Topographic Maps

Aerial photographs obtained from EDR and taken in 1943, 1954, 1965, 1972, 1988, 1993, 2005, 2006, 2007, 2009, and 2010 were reviewed and are found in Appendix C.

The USGS 30 minute series quadrangle topographic maps of the area entitled Rome, Georgia, dated 1904 and the 7.5 minute series quadrangle topographic maps of the area entitled Rome North, dated 1967; Rome South, dated 1968; Rome North, dated 1985; and Rome South, dated 1985 were reviewed and are found in Appendix C.

Aerial Photographs: All the aerial photographs showed the Target Property, with the McCall Hospital at the 310 S. Broad Parcel and a single-family residential structure at the 5 Cherokee Street Parcel.

USGS Topographic Maps:

The topographic map, dated 1904 were not of the scale (1:125000) that one could discern what was located at any site. The topographic maps dated 1968 and 1985 clearly indicated the McCall Hospital was constructed. No single-family structures (even though present per the Aerial Photos) were depicted individually in the most urbanized developed sections of Rome.

5.5.5 Sanborn Fire Insurance Maps

A review of the Sanborn fire insurance maps dated 1903, 1909, 1915, 1926, 1950, and 1969 were reviewed. The 1903 Sanborn map indicates structures on both parcels of the Target Property. The 5 Cherokee Street Parcel seems to have a single-family structure and the 310 S Broad Street has what appears to have also a single-family residential structure. The McCall Hospital did not exist at this time. The 1909 and the 1915 Sanborn Maps indicate a commercial structure, containing office spaces and a drug store on the 310 S Broad Street parcel and the same single-family residential structure remains on the 5 Cherokee Street parcel. The 1926 Sanborn Map indicates the residential structure at the 5 Cherokee Street parcel and the 310 S Broad Street parcel now contains the Francis Berrien Hospital with a Nurses home. The 1950 Sanborn Map indicates the same single-family residential structure and the McCall Hospital at the Target Property composed of the two parcels. The 1969 Sanborn Map indicates the McCall Hospital is still at the 310 S Broad Street parcel but the 5 Cherokee Street parcel are now vacant. The Sanborn Fire Insurance Maps are included as Appendix C.2.

5.5.6 City Directories

City Directories for the Target Property address and adjoining properties were researched on approximate 5-year intervals by EDR back to 1972. Based on the City Directory research the address of 310 S. Broad Street and the McCall Hospital was listed in the 1972 and 1977 directories. Subsequent to that time it was common knowledge that the hospital was converted to apartments around the mid-1980's, however the City Directories list the following uses at the property for the following years: 1982, Canvas Corner art supply; 1987, vacant; 1992, Battle Major Piano & Organ Company; 1997, Southeast Gas Appliance Center; 2002, Southeast Gas Appliance Center; 2007, Southeast Gas Appliance Center; and 2012, Southeast Gas Appliance Center. It is assumed that there could be more than one use on the 310 S. Broad Street property, as after the McCall Hospital era, the property was used for Apartments as well as the other businesses listed.

5.5.7 Previous Environmental Studies

No previous Environmental Studies have been made available. However it is common knowledge that Mercy Housing had commissioned some environmental studies around 2012 but stopped all work for a proposed DCA funded housing application.

5.5.8 Other

No other site information has been provided at this time. If pertinent information is received an addendum will be issued.

Summary: There are no on-site RECs identified through HWEC's review of the available historical information, including topographic maps, Sanborn maps, aerial photographs, city directories, deed records, and other environmental information. Based on the results of HWEC's Phase I Environmental Site Assessment, there are no RECs, either on or off-site, associated with the ASTM scope items. However, to avoid possible future for the non-scope ASTM environmental factors, prior to the demolition of the McCall Hospital and redevelopment of the Target Property, a lead-based paint survey and an asbestos survey must be undertaken. Also the Stipulations of the Section 106 (Historic Preservation) Memorandum of Agreement must be complied with. In addition, as soon as the redevelopment plan for the Target Property has been completed, an updated noise assessment must be completed and, if applicable, a noise mitigation plan prepared. All these measures will ensure that both ASTM scoped items, as well as non-scope ASTM items will not result in any RECs for the Target Property.

5.6 Current Surrounding Land Use

A foot and automobile tour of the surrounding area was conducted to assess area land use and to look for evidence of potential sources of hazardous substances on adjacent or nearby properties. The review was performed by walking along the surrounding properties and driving along the nearby roads. The results of the reconnaissance are summarized in Table 3. Additional discussion is provided following Table 3, as appropriate.

5.6.1 North

Single family residential homes mainly. Small commercial establishment adjacent and north of the Target Property and owned by the same person as owns the Target Property.

5.6.2 East

Single-family residential homes.

5.6.3 South

Residential homes, homeless facility, other commercial uses further south.

5.6.4 West

Residential homes.

TABLE 3: AREA RECONNAISSANCE INFORMATION

ITEMS	Observed Yes/No	DISCUSSION (Blanks indicate items no observed on nearby properties)	REC Yes/No
Area Structures	Yes	Discussed below.	No
Area Property Use	Yes	Discussed below.	No
Wells	No	No wells were observed on the adjacent properties	No
Tanks	No	Discussed below.	No
Drums	No	No drums were observed on the adjacent properties.	No
Other Containers	No		No
Storage Areas	Yes	The surrounding businesses and residential structures had typical storage areas associated with them.	No
Ponds and/or Pools of Liquid or Sludge	No		No
Stained soil or Pavement	No	<i>A de minimis</i> amount of staining was observed on the nearby roads and driveways	No
Stressed Vegetation/Ground Cover	No		No
Solid Waste	Yes	Discussed below.	No
Odors	No	No unusual odors were observed on the properties surrounding the Project Site.	No
Drains and Sumps	Yes	Typical storm drains were observed along the roads.	No

Area Structures/Property Use:

The Target Property is generally surrounded with residential use. There is a small shopping center to the north and a homeless facility to the south.

Tanks:

No ASTs were observed on properties surrounding the Project Site. No features indicative of USTs, such as fill caps, vent pipes, pump islands, or other associated piping were observed adjacent to the Project Site.

Solid Waste:

No staining or stressed vegetation was observed.

5.7 Past Surrounding Land Use

Historical research of the areas surrounding the Target Property from an environmental perspective was conducted. This research included reviewing USGS topographic maps and aerial photographs, conducting interviews with people familiar with the history of the areas surrounding the Target Property, researching Sanborn Maps, and researching City Directories. The following sections summarize the results of the historical research of the areas surrounding the Target Property.

5.7.1 North

The property generally to the north of the Subject Property was historically developed with residential structures dating back to the early 1900's. Later a commercial shopping area was developed just north of the Subject Property and within the same city block. According to all the historic data reviewed none of the uses are considered an REC to the Subject Property.

5.7.2 East

A review of the historical records indicates single-family housing to the east from the early 1900's. By 1950 a service station was present across S. Broad Street from the Target Property. It was later converted into a residence as it is today. Based upon no information in the EDR radius report and the topographical gradient, the old service station property is not an REC to the Target Property.

5.7.3 South

Based on the historical data, the area to the south was developed mostly as single family residential. A service station was present at the intersection of McGhee Street and S. Broad Street and it is still present today. None of the single-family properties or the service station poses as an REC to the Target Property due to topography and surmised subsurface movement of water.

5.7.4 West

The area to the west of the Subject Property has been developed mainly as single family residences, with the exception of occasional commercial use from time to time as a cabinet shop and as an undertaker's business. None of the uses pose a threat of an REC to the Target Property due to distance and the suspected flow of subsurface water and also the fact that none of the properties have been reported on the EDR Radius Report as facilities of concern.

5.8 Historic Preservation

The Target Property is located within two historic districts and as a result of Section 106 Compliance (Historic Preservation), a Memorandum of Understanding (MOA) has been prepared to avoid neglecting the historical significance of the McCall to the history of Rome's medical accomplishments. The documentation supporting the MOA is included as Appendix Q.

6 Data Gaps

6.1 Identification of Data Gaps

HWEC conducted a thorough review on the use of the Target Property during completion of this Phase I ESA. The historical research included sources from 1903 to the present. Table 4 below summarizes many of the common data failures/gaps encountered during the completion of a Phase I ESA. If a significant data gap is identified in the table, a discussion of the data gap and conclusions associated with the gap will follow.

TABLE 4: SUMMARY OF POTENTIAL DATA FAILURES/GAPS

Report Section	Information/Data	Data <small>See Description Below</small>	Significant Data Gap <small>(Y/N/NA)</small>	Additional Action(s) Required <small>(Y/N/NA)</small>
<i>User Provided Information</i>				
4.3.4.1	Title History	Obtained	N	N
4.3.4.2	Environmental Lien Review	Obtained	N	N
4.3.4.3	Specialized Knowledge	Client Provided	N	N
4.3.4.4	Commonly Known Information	Client Provided	N	N
4.3.4.6	Valuation Reduction for Environmental Issues	Client Provided	N	N
<i>Historical Use Information</i>				

5.5.4	Topographic Maps	Obtained	N	N
5.5.4	Aerial Photographs	Obtained	N	N
5.5.5	City Directories	Obtained	N	N
5.5.6	Sanborn Fire Insurance Maps	Obtained	N	N
Site Reconnaissance				
5.1	Exterior Accessibility	Accessible	N	N
5.1	Interior Accessibility	Accessible	Y	Y
Area Reconnaissance				
5.6	Accessibility	Accessibility	N	N
Interviews				
4.3.1	Property Owner	Obtained	N	N
4.3.2	Site Manager/Occupants/Local Residents	Obtained	N	N
4.2	Local Governments Officials	Obtained	N	N

6.2 Sources of Information Consulted to Address Data Gaps

Per ASTM and AAI standards, HWEC has relied on User Provided Information to complete this ESA. If the user fails to provide this information to HWEC, it could result in a determination that "all appropriate inquiry" for this site is incomplete. Further, HWEC is not responsible for any errors or omissions associated with the User Provided information. There was one data gap identified and that was the lack of accessibility to view the basement of the old McCall where the boiler room was once located. The basement was flooded all the way to the top of the stairs. This is also the section in which an old UST that used to contain heating fuel is suspected to have been.

6.3 Significance of Data Gaps

HWEC conducted a historical review on the past use of the Target Property during completion of this Phase I ESA. The historical research included sources from 1903 to present. Based on the historical information obtained, interviews, and information provided by the client, HWEC identified only one significant data gap, which was the inaccessibility to view the old boiler room due to flooding of the basement in that particular area. The rest of the interior of the old McCall Hospital was accessible. Even with this data gap, HWEC is able to render an opinion on the environmental condition of the Target Property, provided at time of demolition of the hospital when the boiler room can be accessed, measures are taken to safely secure and remove the UST, if it is indeed present. Even though it appears a significant data gap, none of the historical records show the existence of such an UST and if present, heating oil is not considered an imminent threat as it is not

explosive. Prior to completion of demolition and certainly before redevelopment of the Target Property, this situation should be dealt with and mitigated.

7 Environmental Concerns

7.1 On-Site

The Target Property consisted of two adjacent parcels of land, totally .98 acres and has two structures, the old McCall Hospital and the associated ambulance garage. Both parcels have been historically developed with structures dating back to at least 1903.

No visual evidence of RECs were observed during the site review on November 14, 2013 of the Target Property as stained soils, stressed vegetation, land filling, or illegal disposal of hazardous substances. Based on the entirety of the Phase I ESA, there are no RECs on the Target Property and none off-site that should impact the Target Property.

Non-scope ASTM items that need to be assessed prior to the demolition of the McCall Hospital are lead-based paint and asbestos. If the structural lead-based assessment indicates lead at above State approved threshold levels, then a lead in soil survey is necessary. Also since the McCall Hospital is within two historic districts, the stipulations of the MOA must be complied with during the remaining scope of work. In addition, an updated noise study and a mitigation plan, if necessary, must be prepared prior to residential redevelopment.

Also should further investigation of the boiler room, when accessible, indicate the presence of an UST in the area, it should be mitigation prior to completion of demolition.

7.2 Off-Site

The Target Property was immediately surrounded by roads, residential structures, a small shopping area adjacent to the Target Property to the north and within the same block. Fourteen off-site listed, regulated and historic facilities were identified within the prescribed search distances from the Target Property.

8 Conclusions and Recommendations

8.1 On-Site

HWEC has performed a Phase I ESA for the Target Property. The ESA is in substantial conformance with the scope and limitations of ASTM Practice E 1527-05 and with the environmental guidelines established by the DCA, dated 2013. Based on this ESA, research, site review and investigation, no evidence of on-site RECs were identified on the Target Property. Even though not within the normal scope of the ASTM, and at the request of the user, a lead-based paint survey and asbestos assessment of the McCall Hospital is required prior to the demolition of the structure. Also, prior to completion to demolition and when the boiler room is accessible, investigation is necessary to ascertain the existence of an UST, and if there is an UST, it is to be removed prior to completion of demolition. In addition, the Memorandum of Understanding stipulations are to be complied with during the scope of the project. Finally, after redevelopment plans are completed, an updated noise assessment should be completed, as well as a noise mitigation plan developed if necessary.

8.2 Off-Site

HWEC has performed a Phase I ESA of the Target Property in substantial conformance with the applicable scope and limitations of ASTM Practice E 1527-05 and the guidelines established by the DCA, dated 2013.

Based on the information reviewed, topography, and/or distance, in HWEC's opinion, the 14 off-site listed facilities do not represent RECs with respect to the Target Property.

9 Data References

ASTM Practice E 1527-05

EPA AAI, Title 40 of the Code of Federal Regulations, Part 312 (40 CFR 312)

U.S. Department of Housing and Urban Development (HUD) Regulations & Guidelines)

DCA Guidelines, dated 2013

U.S. Fish & Wildlife, National Wetland Inventory (NWI) map and Endangered Species Data

U.S. Department of Agriculture, Soil Conservation Service, Soil Survey of Floyd County, <http://soils.usda.gov>

Federal Emergency Management Agency, National Flood Insurance Program, Flood Insurance Rate Map, Rome, Georgia, Community Panel No. 13115C0281E, September 25, 2009

Department of Natural Resources (DNR), National Heritage Inventory Program (NHIP), Endangered Species

www.edrnet.com: Regulatory Review, City Directories, Sanborn Maps, Topographic Maps and Aerial Photographs, as referenced.

United States Geologic Survey, 7.5-minute series quadrangle Topographic Map, Rome, Georgia, dated 1904, 1967, 1968, and 1985

<http://www.gaepd.org> -Brownfield List updated March 2013

EPA's Map of Radon Zones, Georgia, Radon Division Office of Radiation and Indoor Air, US EPA, 1993

Rules of DNR....391-3-6 Water Quality Control

National Register of Historic Places

10 Valuation Reduction

10.1 Purchase Price

The User indicated that the Purchase Price of the Target Property was representative of the fair market value for the vicinity of the Target Property.

10.2 Interview of Broker Regarding Market Value

HWEC did not interview a broker regarding the market value of the Target Property. Based on the data provided to us and the results of our ESA, HWEC's opinion is that there is no differential in the purchase price due to environmental concerns.

10.3 Differential between Purchase Price and Market Value

In HWEC's opinion, there is no differential in the purchase price due to environmental concerns.

10.4 Environmental Reasons For Any Differential

HWEC did not identify environmental concerns that would affect the purchase price.

Tables

Table 1- Regulatory Agency Review

Table 2- Summary of Identified Facilities

Table 3- Area Reconnaissance Information

Table 4- Summary of Potential Data Failures/Gaps

Appendices

Appendix A- Figures and Maps

Figure 1- USGS Topographic Map

Figure 2- USFWS National Wetlands Inventory Map

Figure 3- Soil Survey Map

Figure 4- FEMA Floodplain Map

Figure 5- Site Map- Existing Conditions

Figure 6- Site Map- Proposed Conditions

Figure 7- Radon Map

Appendix B- Photographs

Appendix C- Historical Research Documentation

- 1. Historic Aerial Maps**
- 2. Sanborn Fire Insurance Maps**
- 3. Historic Topographic Maps**
- 4. City Directories**

Appendix D- Documentation From Title Company/ Title Professional

- 1. Recorded Land Title Records**
- 2. Records of environmental liens and activity and use limitations**
- 3. Legal Description**

Appendix E- Non-Scope Testing

1. Lead-Based Paint
2. Lead in Soil
3. Lead in Water
4. Asbestos
5. Radon
6. Vapor Encroachment Screening

Appendix F- Noise Assessment Documentation

1. Noise Assessment Report
2. Noise Attenuation Plan

Appendix G- Regulatory Search Information

1. Regulated Facilities Radius Map Report
2. File Review Documents

Appendix H- Record of Communications and Interviews

1. User/applicant interview
2. Interview of owners and occupants of neighboring properties
3. Documentation of attempts to interview:
 - a. *Local fire department*
 - b. *State or health department or environmental agency*
 - c. *Local agency responsible for issuance of building permits*
 - d. *Local agency responsible for issuance of groundwater permits*

Appendix I- Author Credentials, Documentation of Qualifications as an "Environmental Professional"

Appendix J- Owner Environmental Questionnaire

Appendix K- Property Log and Information Check List

Appendix L- Proof of Insurance

Appendix M- Letters of Reference

Appendix N- Environmental Certification

Appendix O- Consumer Confidence Report of Water Quality

Appendix P- Endangered Species Documentation

Appendix Q- SHPO Review Documentation

Appendix R- Additional HOME Requirements

1. HOME and HUD Environmental Questionnaire
2. HOME and HUD Questionnaire supporting documentation
3. 8-Step process for floodplains and wetlands

Appendix S- Operation and Maintenance Manual

Appendix T- Previous Environmental Reports

1. Previous Phase I
2. Previous Phase II Reports