



Phase I Environmental Site Assessment
PID: 22-07-3-27-001
Northfield, Minnesota

Prepared for:
City of Northfield Housing and
Redevelopment Authority

October 2024

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Executive Summary

Landmark Environmental, LLC (Landmark) completed a Phase I Environmental Site Assessment (ESA) on behalf of the City of Northfield Housing and Redevelopment Authority (User) of vacant land located near the intersection of Southbridge Drive and Millstream Lane in Northfield, Rice County, Minnesota (Property). Landmark performed this Phase I ESA and prepared this Phase I ESA report (Report) in general conformance with the U.S. Environmental Protection Agency (EPA) All Appropriate Inquiries (AAI) Final Rule, as amended on December 15, 2022, the American Society for Testing and Materials (ASTM) Practice E 1527-21 (the Practice), and User-specific requirements.

The Property is currently owned by the City of Northfield Housing and Redevelopment Authority (Property Owner) and used as a road. The Property consists of 7.27 acres of land that currently is zoned as N2-B: Neighborhood General 2 by the City of Northfield. Currently, the Property is used as green space and a road. No buildings or structures are present on the Property. Aspen Street terminates at the southern Property boundary, Brookside Drive terminates on the southeast corner of the Property, and Southbridge Driver terminates at the eastern Property boundary.

The Property was developed for agricultural uses as early as 1938. A field road was apparent along the north Property boundary from at least 1938 until the 1980s. By 2008, agricultural uses ended and the Property became vacant land with a dirt road running north to south on the central portion of the Property. The Property has remained vacant, except for the dirt road and some storage for adjacent construction sites. Given the Property's historic agricultural uses, historical activities at the Property did not likely involve the use of significant quantities of hazardous substances and/or petroleum products, except for common agricultural chemicals (pesticides, herbicides). No evidence suggests that pesticides/herbicides were stored on the Property or were improperly applied during agricultural activities.

A regulatory records review for the Property was obtained from Environmental Data Resources, Inc. (EDR) on September 16, 2024. The Property *is* not identified in regulatory lists searched by EDR.

Regulatory-listed sites surrounding the Property were also reviewed and are described in detail in Section 4.4 of this Report. **No** sites were identified within the search radii defined by the Practice.

Landmark conducted a non-scope service of a Limited Phase II Investigation (Investigation) concurrently to this Phase I ESA. Trace amounts of wood cinders were observed within fill material at two of the geotechnical soil borings; however, samples submitted for laboratory analysis confirmed that the cinders are considered *de minimis* condition and not an environmental condition. The Investigation is detailed in Section 7.0.

Recognized environmental conditions (RECs) indicate the presence or likely presence of any hazardous substances or petroleum products on the Property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the Property or into ground, groundwater, or surface water of the Property. Historical recognized environmental conditions (HRECs) are defined as past releases that have been addressed to a degree allowing for unrestricted use of the Property. Controlled recognized environmental conditions (CRECs) are defined as past releases that have been addressed but allow contamination to remain in place subject to the implementation of required controls. A *de minimis* condition is related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action from appropriate governmental agencies. A business environmental risk (BER) is a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of the Property. A significant data gap is a data gap or data failure that affects the ability to identify a REC at the Property.

Based upon the records review, Property reconnaissance, and interviews, there were no known or suspect environmental conditions identified for the Property. Since there were no known or suspect environmental conditions identified for the Property, the Report did not identify any RECs, CRECs or HRECs in connection with the Property.

1.0 Introduction

Landmark Environmental, LLC (Landmark) completed a Phase I Environmental Site Assessment (ESA) on behalf of the City of Northfield Housing and Redevelopment Authority (User) of vacant land located near the intersection of Southbridge Drive and Millstream Lane in Northfield, Rice County, Minnesota (Property). The Property location is shown on **Figure 1**. Landmark performed this Phase I ESA and prepared this Phase I ESA report (Report) in general conformance with the U.S. Environmental Protection Agency (EPA) All Appropriate Inquiries (AAI) Final Rule, as amended on December 15, 2022, the American Society for Testing and Materials (ASTM) Practice E 1527-21 (the Practice), and User-specific requirements.

1.1 Purpose

Landmark was retained by the User to complete this Phase I ESA for the purposes of satisfying the AAI Final Rule requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) liability. Landmark was also retained by the User to complete this Phase I ESA for the purposes of understanding potential environmental conditions that could materially impact the operation of business associated with the Property and understanding environmental conditions of the Property to aid in the decision-making processes relating to a commercial real estate transaction in accordance with the Practice and User-specific requirements.

1.2 Detailed Scope of Services

This Phase I ESA consisted of reviewing readily ascertainable and reasonably reviewable regulatory and land use information, as well as conducting a physical Property reconnaissance and Property representative and local government interviews. Records reviewed for preparation of this Phase I ESA are listed in Section 12.0. Photographs taken during the Property reconnaissance are included in **Appendix A**. Historical research and regulatory records are included in **Appendix B** and **C**, respectively. Additional Property information including User-provided information is included in **Appendix D**. Evaluation of available information was used to determine if evidence exists that indicates the release of hazardous substances, hazardous materials or petroleum products to the Property. Any deviations from the standards, guidelines, or requirements presented in the AAI Final Rule, the Practice, and/or User-specific requirements are discussed below and/or in Sections 1.5 or 5.0 of this Report.

The following additional non-scope consideration was addressed as part of the Phase I ESA conducted at the Property and discussed in Section 7.0: a Limited Phase II Investigation.

The scope of the Phase I ESA did **not** involve the collection and analysis of any type of sample or survey with respect to the following: matters of structural engineering; compliance with environmental regulations; compliance with industrial hygiene and/or health and safety programs; asbestos-containing materials (ACM) or lead-based paint (LBP); presence of radon and/or radionuclides; lead in drinking water; presence of wetlands; presence of cultural, historic, and/or ecological resources and/or endangered species; quality of indoor air; biological agents; mold; potential for earthquakes and/or flooding; presence of high voltage powerlines; or regulatory compliance.

1.3 Special Terms and Conditions

The purpose of the Report is to aid in the environmental assessment of the Property and not to evaluate the structural condition of the buildings or other features of the Property. Except as identified in Sections 1.4 and 1.5 below, no intentional deviations from the Practice were made in preparing the Report.

Landmark has performed its work in a manner consistent with the care and skill ordinarily exercised by members of the environmental profession under similar budget and time constraints. Landmark assumes responsibility for its own observations and statements made in this Report, along with its interpretation of the information gathered. No other warranty is made or intended.

Since Landmark was not retained to verify information, Landmark assumes no responsibility for the accuracy of information that it obtained from other sources, including, without limitation, regulatory and government agencies, persons knowledgeable about the Property, and vendors of public data. To the extent that Landmark does not identify contamination or potential sources of contamination to the Property in the Report, Landmark's conclusions in the Report are not representations that the Property is free of contamination. Performance of the Practice is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or historical recognized environmental conditions (HRECs) in connection with the Property, recognizing reasonable limits on time and cost.

The Practice states that RECs indicate “(1) the presence of hazardous substances or petroleum products in, on, or at the Property due to a release to the environment; (2) the

likely presence of hazardous substances or petroleum products in, on, or at the Property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the Property under conditions that pose a threat of a future release to the environment.” CRECs are defined as past releases “that have been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (for example, activity and use limitations [AULs] or other property use limitations).” CRECs are considered RECs. HRECs are defined as “a previous release of hazardous substances or petroleum products affecting the property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the Property to any controls (for example, AULs or other property use limitations).” A HREC is not considered a REC.

A *de minimis* condition is “related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.” A *de minimis* condition is not considered to be a REC. A business environmental risk (BER) is “a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of the Property, not necessarily related to those environmental issues required to be investigated as defined by the Practice.” A BER is not considered to be a REC. A significant data gap is a data gap or data failure that affects the ability to identify a REC at the Property. A significant data gap may or may not be considered a REC.

Under no circumstances can Landmark represent or warrant that hazardous or toxic materials do not exist on the Property.

1.4 Significant Assumptions

Landmark assumes that the information provided by the User, regulatory database provider, and regulatory and public agencies is true and reliable.

No additional significant assumptions were made with respect to the Property.

1.5 Limitations and Deviations

The findings, opinions, and conclusions in this Report are subject to the following data limitations and deviations, which in turn, may result in a significant data gap that will affect the ability to identify an environmental condition at the Property:

- Historical documentation dated prior to 1938 was not readily ascertainable for the Property.

Based on available information, these limitations and deviations do not represent significant data gaps and are not expected to impact the conclusions presented in this Report.

Historical documentation was reviewed for significant data gaps and none were identified. Significant data gaps in historical records are defined as 5 years or more during which the Property use changed and no historical records were available.

1.6 User Reliance

The Report was prepared for the exclusive use of User. As defined by the Practice, no others may rely on the Report without the User's and Landmark's written permission. Landmark owes no duties of care or otherwise to anyone other than the User and makes no warranties to anyone other than the User.

2.0 User-Provided Information

For preparation of this Report, the User provided (or contracted with Landmark to provide) the following information with regard to the Property.

2.1 Reason for Performing Phase I

The User intends to develop the Property for residential use.

2.2 Title Records

A title records search was not provided by the User for incorporation in this Phase I ESA. The User did not contract with Landmark to provide a title records search as part of the scope for this Phase I ESA.

2.3 Environmental Liens or Activity and Use Limitations

The User indicated no knowledge of environmental liens or AULs for the Property.

2.4 Specialized Knowledge

Specialized information provided by the User with regard to the environmental condition of the Property is included throughout the applicable sections of the Report.

2.5 Commonly Known or Reasonably Ascertainable Information

Commonly known or reasonably ascertainable information available within or known throughout the local community that was provided by the User with regard to the environmental condition of the Property is included throughout the applicable sections of the Report.

2.6 Valuation Reduction for Environmental Issues

The User did not report knowledge of a valuation reduction of the Property for environmental issues.

2.7 Owner, Property Manager, and Occupant Information

The User provided contact information for the following Property Owner representative: Ms. Melissa Hanson, City of Northfield Housing and Redevelopment Authority. This representative was interviewed regarding their knowledge of current and historic Property

uses; information obtained during those interviews is used throughout applicable sections of the Report and summarized in Section 6.0.

2.8 Other Information—Such as Previous Assessments or Investigations

The User provided Landmark with the following additional information for the Property:

- Braun Intertec Corporation (Braun). May 9, 2002. *A Geotechnical Evaluation Report for Arcon Development, Inc., Proposed Koester Property Development, 10535 Dennison Boulevard, Northfield, Minnesota.* (Braun 2002 Geotech Report)
- Well Sealing Notification Forms.

These documents are included in **Appendix D**.

3.0 Property Description

3.1 Location and Legal Description

The Property is located near the intersection of Southbridge Drive and Millstream Lane, Northfield, Rice County, Minnesota in the Southwest Quarter of Section 7 in Township 111 North Range 19 West. The Property consists of one tax parcel, does not have an address, and has the following Property Identification Number (PID): 22-07-3-27-001.

The Property location is shown on **Figure 1**. The Property layout with existing features is shown on **Figure 2**.

3.2 Property and Vicinity General Characteristics

The Property is currently owned by the City of Northfield Housing and Redevelopment Authority (Property Owner) and used as a road. The Property consists of 7.27 acres of land that currently is zoned as N2-B: Neighborhood General 2 by the City of Northfield.

The general Property vicinity has been developed since 1938 for residential and agricultural use.

3.3 Current Use of the Property

Currently, the Property is used as green space and a road. These uses are *not* likely to involve the use, treatment, storage, disposal, or generation of significant quantities of hazardous substances or petroleum products. Current Property features are shown on **Figure 2**.

3.4 Descriptions of Structures, Roads, Other Improvements

No buildings or structures are present on the Property. The Property has the potential to be supplied with municipal water, sanitary sewer, and stormwater connections. Aspen Street terminates at the southern Property boundary, Brookside Drive terminates on the southeast corner of the Property, and Southbridge Drive terminates at the eastern Property boundary.

3.5 Current Uses of Adjoining Properties

The Property is adjacent to vacant land with residential developments to the north, a home and farm buildings to the west, townhomes to the east, and vacant land with agricultural land beyond to the south.

Current uses of adjacent sites are **not** likely to involve the use, treatment, storage, disposal or generation of significant quantities of hazardous substances or petroleum products.

4.1 Physical Setting Sources

Surface elevations of the Property range from 972 to 976 feet above mean sea level. Sites to the west are topographically upgradient of the Property. Unconsolidated sediments consisting of outwash (gravelly sand with silt beds) underlie the Property. The uppermost bedrock unit consisting of Prairie Du Chien Group (dolostone, sandstone, and minor shale) is present at an approximate depth of less than 50 feet beneath the Property.

Groundwater is anticipated to be present beneath the Property at an approximate depth of 5 to 20 feet based on previous Geotechnical reports and nearby well records. The anticipated groundwater flow direction is northwest toward Cannon River, the nearest likely discharge zone. The nearest surface water body is a stormwater pond located approximately 170 feet from the Property.

4.2 Historical Use Information on the Property

The Property was developed for agricultural uses as early as 1938. A field road was apparent along the north Property boundary from at least 1938 until the 1980s. By 2008, agricultural uses ended and the Property became vacant land with a dirt road running north to south on the central portion of the Property. The Property has remained vacant, except for the dirt road and some storage for adjacent construction sites.

No known wells exist on the Property.

Given the Property's historic agricultural uses, historical activities at the Property did not likely involve the use of significant quantities of hazardous substances and/or petroleum products, except for common agricultural chemicals (pesticides, herbicides). No evidence suggests that pesticides/herbicides were stored on the Property or were improperly applied during agricultural activities.

4.3 Historical Use Information on Adjoining Properties

The general Property vicinity has been developed since at least 1938 for agricultural use. Historic uses of adjacent sites are as follows:

The sites adjacent to the Property were first developed some time prior to 1938 for agricultural uses, except for the west-adjacent site, which was developed for residential/agricultural use. Throughout the years, multiple farming-related buildings

were constructed west-adjacent to the Property. Around 1996, the north-adjacent sites ended agricultural uses and were developed as single-family residential homes. Around 2008, agricultural uses ended south and east-adjacent to the Property. Townhouses were constructed to the east by 2015. The adjacent sites have remained relatively unchanged since then.

Historical uses of adjacent sites are considered unlikely to have used/stored significant quantities of hazardous substances and/or petroleum products.

4.4 Standard Environmental Record Sources

A regulatory records review for the Property was obtained from Environmental Data Resources, Inc. (EDR) on September 16, 2024. The regulatory report is in **Appendix C**. Where possible, duplicate database listings in the EDR report were removed from the following regulatory review and are not discussed further. In addition, Landmark reviewed other publicly accessible databases including the Minnesota Pollution Control Agency's (MPCA's) What's in My Neighborhood (WIMN), Petroleum Remediation Program (PRP) Maps Online, and Minnesota Groundwater Contamination Atlas, as well as the Minnesota Department of Agriculture's (MDA's) WIMN.

The Property is **not** identified in regulatory lists searched by EDR.

Sites identified within the search radii defined by the Practice are as follows (where possible, duplicate database listings in the EDR report were removed from the tally):

<u>0</u>	Federal National Priority List (NPL) site list (≤ 1.0 miles).
<u>0</u>	Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list (≤ 0.5 miles).
<u>0</u>	Federal CERCLIS No Further Remedial Action Planned (NFRAP) site list (≤ 0.5 miles)
<u>0</u>	Federal Resource Conservation and Recovery Act (RCRA) non-Corrective Action Sites (CORRACTS) Transfer, Storage, and Disposal (TSD) Facility (≤ 0.5 miles).
<u>0</u>	Federal RCRA CORRACTS list (≤ 1.0 miles).
<u>0</u>	Federal RCRA generators list (Property and adjoining properties).
<u>0</u>	Federal Emergency Response Notification System (ERNS) list (Property only).
<u>0</u>	State list of hazardous waste sites identified for investigation or remediation (NPL or CERCLA equivalent sites) (≤ 1.0 miles).
<u>0/0</u>	State Voluntary Investigation & Cleanup (VIC) Program/Petroleum Brownfield (PB) Program sites (≤ 0.5 miles).
<u>0</u>	State landfill and/or solid waste disposal site lists (≤ 0.5 miles).
<u>0/0</u>	State leaking underground storage tanks/leaking above-ground storage tanks (LUST/LAST) lists (≤ 0.5 miles).
<u>0/0</u>	State registered underground storage tanks/above-ground storage tanks (UST/AST) list (Property and adjoining properties).

No sites were identified within the search radii defined by the Practice.

4.5 Additional Environmental Record Sources

Previous environmental assessments or investigations were not conducted at the Property or portions thereof.

5.0 Property Reconnaissance

5.1 Methodology and Limiting Conditions

The Property reconnaissance was conducted by Jane Rogers, a representative of Landmark, on September 26, 2024. Existing Property features are shown on **Figure 2**; Property reconnaissance photographs are in **Appendix A**.

5.2 General Site Setting

The Property is in an area of mixed residential and agricultural land use. The periphery of the Property is characterized by residential developments to the north and east, agricultural developments to the south, and a residential/agricultural development to the west. Access is unrestricted to pedestrian traffic; vehicular access to the Property is via Southbridge Drive and Aspen Street.

The following table summarizes the Property reconnaissance and interview findings. All items that currently are present at the Property are noted in the table. The table also notes whether or not the identified features are considered to be of potential environmental concern. Discussions of those that are considered to be of potential environmental concern are referenced. Features that were not identified to be present at the Property are not further discussed.

On-Site Features	Currently Present (Y/N)	Potential Environmental Condition (Y/N)	Report Section
Hazardous Substance/Petroleum Products	N		
USTs	N		
ASTs	N		
Odors	N		
Air Emissions (stacks, hoods, etc.)	N		
Pools of Liquid	N		
Drums	N		
Unlabeled Substance Containers	N		
Electrical Equipment/Possible PCBs	N		
Hydraulic Equipment/Possible PCBs	N		
Staining/Corrosion of Containers/Equip.	N		
Drains	N		
Sumps	N		
Pits, Pond, Lagoons	Y	N – A lower area for a future road had accumulated water	5.3
Stained Soil or Pavement	N		
Surface Disposal/Debris	Y	N – Miscellaneous debris as well as piles of trees and a pile of asphalt	5.3
Stressed Vegetation	N		
Evidence of Spills or Releases	N		
Indications of On-Site Fill Material	Y	N – Property had been improved to support future residential homes	5.3
Liquid Discharges to Ditches, Streams or Adjacent Land	N		
Fuel Pipelines	N		
Process Waste Water	N		
Wells	N		
Septic Systems	N		
Dry Cleaning Operations	N		
Agricultural Use	N		
Oil Gas Production/Exploration	N		

On-Site Features	Currently Present (Y/N)	Potential Environmental Condition (Y/N)	Report Section
Railroad Uses	N		
Remedial Activities	N		

5.3 Exterior Observations

The Property consists of a vacant lot intended for the development of residential housing. Land had been modified for roads, which created wide areas of lower elevation on the Property that was filled with water. The Property is covered in dense vegetation, with scattered debris and litter. Several piles of branches and trunks of trees were observed on the Property. In the central west portion of the Property, a pile of asphalt was observed. A paved path for foot and bike traffic runs throughout the Property.

The following were **not** observed to be present in outdoor areas at the Property: transformers; electrical or hydraulic equipment; visible evidence of vegetative stress or burned areas; pits, ponds, or lagoons; stained soil or pavement; indications of septic system or cesspool; pipelines; rail lines; liquid discharges into drains, ditches, or streams or onto adjacent property.

5.4 Interior Observations

No structures exist on the Property.

6.1 Interview with Property Owner

Property Owner Representative

Date of Interview: October 10, 2024

Name: Melissa Hanson

Company Name: City of Northfield

Years Familiar with Property: 16 years

Telephone Number: 507-645-3047

Relevant information provided by Ms. Hanson was used throughout the Report. She is not aware of any documented releases to the Property or any environmental condition related to the Property or adjacent properties.

6.2 Interviews with Local Government Officials

See above.

7.1 Limited Phase II Investigation

7.1.1 Introduction

Landmark conducted a Limited Phase II Environmental Investigation (Investigation) as a non-scope service to this Phase I ESA, on behalf of the City of Northfield at the Property. The location of the Property is shown on **Figure 1**.

The Investigation provides an evaluation of the soil and fill material that may be disturbed as part of the development of the Property. As part of the Investigation, Landmark collected soil samples for environmental purposes at borings advanced during a geotechnical investigation to provide overall spatial coverage across the Property for future soil management considerations.

Figure 3 shows the Investigation locations. All Investigation activities were conducted in accordance with Landmark Standard Operating Procedures (SOPs), as well as applicable Minnesota Pollution Control Agency (MPCA) guidance documents.

7.1.2 Field Investigation Summary

Landmark completed the field work portion of the Investigation on September 26, 2024, at the locations shown on **Figure 3**. Prior to conducting the fieldwork, Landmark prepared a Site Safety Plan. Geotechnical drilling services for the collection of soil samples were provided by Haugo GeoTechnical Services, LLC (Haugo) and Landmark sampled near surface fill material as described below. All borings were sealed in accordance with Minnesota Department of Health (MDH) requirements.

Haugo advanced six borings with a hollow-stem auger drill rig, labeled Soil Boring 1 (SB-1) through SB-6, for geotechnical purposes. SB-1 through SB-6 were advanced to depths between 0 and 22 feet below ground surface (bgs) at locations where the future building structure will be located on the Property. Landmark collected soil samples from each of the geotechnical borings for environmental purposes and field screened samples as described below. Soil and fill material samples were collected at four of the borings and submitted for laboratory analysis to characterize shallow soil (less than 12 feet bgs).

Soil samples are labeled according to location and depth. For instance, sample SB-1/4-6' was collected at geotechnical boring location B-1 from 4 to 6 feet bgs. All soil samples were screened in the field for organic headspace values with a photoionization detector

(PID) equipped with an 11.7 eV bulb as well as visual observation. Four soil samples were submitted to Eurofins Test America (Eurofins) for fixed-base laboratory analysis of Resource Conservation and Recovery Act (RCRA) metals, polynuclear aromatic hydrocarbons (PAHs), diesel range organics (DRO) and volatile organic compounds (VOCs) to confirm field screening results. Field screening results are listed on the boring logs in **Appendix F**, and the detected parameters from the analytical results are listed on **Table 1** in **Appendix F**.

7.1.3 Field Investigation Results

The ground surface across the Property is covered with grass. As listed in the field notes in **Appendix F**, non-native fill material was observed to depths between 4 and 6 feet bgs. The fill material is comprised of sand with varying amounts of silt and gravel. Underlying reworked native and native material was observed between 4 and 10 feet bgs and is comprised of sand with varying amounts of silt and gravel. Native material beneath 10 feet bgs consists of organic clayey silt and clay, typical of the lacustrine deposits in the area. Groundwater was encountered in the geotechnical borings within sand seams at approximately 20 feet bgs.

No field screening indications of contamination were observed including staining, odors or elevated PID readings in the samples collected from borings SB-1 through SB-6. Trace amounts of wood cinders were observed at SB-3 from 9.5 to 11 feet bgs and at SB-6 from 4.5 to 6 feet bgs.

7.1.4 Laboratory Analytical Results

Detected analytical parameters for soil samples are listed in **Table 1** in **Appendix F** along with the MPCA Residential Soil Reference Values (RSRVs) and Tier 1 Soil Leaching Values (SLVs) for comparison purposes. The Eurofins laboratory report is included in **Appendix F** and the following items summarize the analytical results listed in **Table 1**:

- All reported RCRA metals were detected at concentrations below MPCA criteria and within typical background levels.
- VOCs, PAHs, and DRO were not detected in any of the soil samples submitted to Eurofins.

7.1.5 Conclusions and Recommendations

The City of Northfield plans to redevelop the Property for residential use. As such, the Investigation was completed to determine future soil management considerations associated with the redevelopment. Fill material and reworked native material was observed at all locations. Although the fill material contained trace amounts of wood

cinders at SB-3 and SB-6, all concentrations of reported RCRA metals were well below MPCA criteria and within naturally occurring background ranges, and PAHs, DRO and VOCs were not detected. As such, the trace amount of wood cinders observed at two of the boring locations is considered *de minimis* condition and not an environmental condition.

8.0 Findings

Based upon the records review, Property reconnaissance, and interviews, there were no known or suspect environmental conditions identified for the Property.

9.0 Opinions

This section of the Report provides Landmark's rationale for concluding whether the findings are or are not considered to constitute RECs, CRECs, or HRECs. Additionally, this section identifies BERs, de minimis conditions, and significant data gaps. As stated, RECs indicate the presence or likely presence of any hazardous substances or petroleum products on the Property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the Property or into ground, groundwater, or surface water of the Property. CRECs are defined as past releases that have been addressed but allow contamination to remain in place subject to the implementation of required controls. HRECs are defined as past releases that have been addressed to a degree allowing for unrestricted use of the Property. A *de minimis* condition is related to a release that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action from appropriate governmental agencies. A BER is a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of the Property. A significant data gap is a data gap or data failure that affects the ability to identify a REC at the Property.

There are no known or suspect environmental conditions identified; therefore, the Report did not identify any RECs, CRECs or HRECs in connection with the Property.

10.0 Conclusions

Landmark performed this Phase I ESA in September and October 2024 in general conformance with the EPA AAI Final Rule, the Practice, and User-specific requirements for the Property. Any exceptions to, or deletions from the EPA AAI Final Rule, the Practice, and User-specific requirements are described in Sections 1.5 and/or 5.0 of this Report.

This Phase I ESA revealed no evidence of RECs, CRECs, or significant data gaps in connection with the Property for the specified Property use of the User.

11.0 Statement and Signatures

Landmark performed this Phase I ESA in September and October 2024 in general conformance with the EPA AAI Final Rule, as amended on December 15, 2022, the ASTM Practice 1527-21, and User-specific requirements. Special terms, conditions, limitations and exceptions, and deviations that apply to this Phase I ESA are described in previous sections.

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 312 and 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.

Nicole Bonde-Jones
Environmental Professional

Jerry Mullin
Environmental Professional

Landmark's experience and the environmental professional(s) and project team qualifications are included in **Appendix E**.

12.0 References

- Aerial Photographs. 1938, 1940, 1951, 1953, 1958, 1964, 1970, 1979, 1984, 1988, 1991, 1996, 2003, 2008, 2015. 2019, 2023. Provided by Historical Information Gatherers (HIG).
- Building Inspection Records (City of Northfield). Provided September 18, 2024. Provided by HIG.
- City Directories. 1998, 2001. Provided by HIG.
- Campion, Moira; Wetzel, Todd. 1997. *Geologic Atlas of Rice County, Minnesota, County Atlas Series C-09, Part B*. Minnesota Department of Natural Resources.
- County Assessor's Records (Rice County). Provided September 18, 2024. Provided by HIG.
- Environmental Data Report (EDR). September 16, 2024. EDR-Radius Map without Geocheck, Property.
- Hobbs, H.C. 1995. *Geologic Atlas of Rice County, Minnesota, County Atlas Series C-09, Part A*. Minnesota Geological Survey.
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