



Consulting
Engineers and
Scientists

Phase I Environmental Site Assessment

800-822 North Harlem Avenue
River Forest, Illinois 60305

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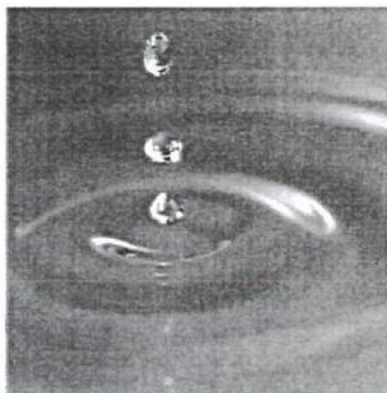


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Executive Summary

GEI Consultants, Inc. (GEI), on behalf of Kaufman Jacobs (Client), has completed a Phase I Environmental Site Assessment (ESA) of three contiguous properties located at 800 to 822 North Harlem Avenue in the Village of River Forest, Cook County, Illinois (Property). The Phase I ESA was conducted in general accordance with GEI's proposal dated March 16, 2018, and the American Society for Testing and Materials (ASTM) Standard E 1527-13 titled, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM Standard). The purpose of this Phase I ESA was to identify, to the extent practicable, pursuant to processes prescribed in the ASTM Standard, recognized environmental conditions (RECs) in connection with the Property.

The Property includes three contiguous properties located at 800 North Harlem Avenue, 818 North Harlem Avenue, and 822 North Harlem Avenue in the Village of River Forest, Cook County, Illinois. The Property consists of one commercial property and two neighboring residential properties owned by three separate entities:

1. TCF Bank (800 North Harlem Avenue), developed with a single-story, 7,400 square-foot building that was constructed in 1973. The building, is primarily situated on an approximately 37,000 square-foot property consisting of four parcels (Cook County Parcel Nos. 15-01-418-018 through 15-01-418-021).
2. Mr. Khan Sam (818 North Harlem Avenue), developed with a multi-story residential home constructed in 1924 on an approximately 9,000 square-foot property consisting of one parcel (Cook County Parcel No. 15-01-418-017).
3. Mr. Aaron Johnson (822 North Harlem Avenue), developed with a multi-story residential home constructed in 1924 on an approximately 9,000 square-foot property consisting of one parcel (Cook County Parcel No. 15-01-418-016).

The Property is in a mixed residential and commercial land use area, serviced by public potable water, public sanitary sewer, electrical, natural gas, and telecommunications services.

Ms. Fran Skala, Vice President of Facilities Lakeshore Division of TCF Bank (800 North Harlem Avenue); Ms. Deborah Hill, Owner of Hill Law Offices (818 North Harlem Avenue); and Mr. Ruben Ruban, Assistant Vice President of SVN (822 North Harlem Avenue), were identified as the Property representatives (i.e., key site managers) and interviewed as part of this Phase I ESA. Mses. Skala and Hill and Mr. Ruban were not aware of any prior uses of, or potential environmental concerns with the Property; any environmental liens or activity/use limitations associated with the Property; any past or pending environmental litigation associated with the Property; any existing petroleum product or other hazardous substance storage tanks on the Property; or any fires or spills occurring on the Property.

Interviews and review of reasonably ascertainable information suggest that the northern portion of the Property was developed with residential buildings and detached garages since 1924 and has been used for residential purposes since then. Historical Sanborn maps show the southern portion of the Property developed as an office as early as 1930 and remained until at least 1938. Available information suggests the southern portion of the Property was occupied by a large store on the east (historical address of 7208 Chicago Avenue) and smaller store on the west side as early as 1951 and remained occupied by the two structures until at least 1962. Historical aerial photographs show the southern portion of the Property as redeveloped with a commercial building on the east side and the same small store on the west from as early as 1972 and remained until at least 1988. Documents provided by the Village of River Forest show several occupants for the commercial building (800 North Harlem Avenue) between 1970 and 2016 including: Original House of Pies (1970-1980); Life Savings & Loan (1981-1986); R.J. McGough Associates, Inc. (1982-1984); M&R Security (1984); Jenny Craig Weight Loss Centre (1985-1991); TCF Banking & Savings (1987-1991); TCF Bank (1993-2016). Ms. Skala indicated TCF Bank has occupied the building since the 1990s; however, documents provided by the Village of River Forest show TCF Banking & Savings, original name of TCF Bank, occupied the front portion of the building as early as 1987.

We have performed a Phase I Environmental Site Assessment of the Property in conformance with the scope and limitations of ASTM Practice E1527-13. Any exceptions to, or deletions from, this practice are described in Sections 1.4 and 8.2 of this report.

This assessment has revealed no evidence of RECs in connection with the Property. Accordingly, it is our opinion that further environmental assessment of the Property is not warranted at this time.

Although not considered RECs, the following conditions were identified which may be considered a Business Environmental Risk (BER) a BER is defined by ASTM as "a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice."

- Housekeeping – During the site reconnaissance, outdoor material storage was noted at the residential property located at 818 N. Harlem Avenue. Noted materials included tires, ladders, batteries, rust preventative, and other material covered with tarps. While no significant environmental issues were identified, removal of this material may require management as a solid waste.
- Urban fill - The shallow subsurface on the Property and other surrounding sites may be generally characterized by urban fill comprised of soil mixed with cinders, brick fragments, and other debris to varying depths. Urban fill has the potential to contain elevated concentrations of metals and petroleum hydrocarbons. If disturbed, this material may need to be managed as a solid waste. Environmental sampling of subsurface soils would be necessary to confirm soil characteristics.

1. Introduction

GEI Consultants, Inc. (GEI) has completed a Phase I Environmental Site Assessment (ESA), in general accordance with the American Society for Testing and Materials (ASTM) Standard E1527-13 titled, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (ASTM Standard), of the Property at 800 to 822 North Harlem Avenue in the Village of River Forest, Cook County, Illinois (Property). This Phase I ESA was conducted on behalf of Client to identify potential environmental liabilities associated with the Property.

1.1 Purpose

The purpose of this Phase I ESA was to identify, to the extent practicable pursuant to processes prescribed in the ASTM Standard, RECs in connection with the Property.

The ASTM Standard defines a REC as:

“The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to the release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.”

An REC may be identified due to the known or suspected migration of hazardous substances or petroleum products as a solid or liquid at the surface or in the subsurface, and/or as vapor in the subsurface. An REC identified due to subsurface vapor migration would be based on the Environmental Professional’s interpretation of applicable elements of the Tier 1 procedure described in ASTM Standard E2600-10 titled, *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*.

The term REC includes hazardous substances or petroleum products even under conditions in compliance with laws. The term REC is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The ASTM Standard defines a controlled REC (CREC) as:

“A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

The ASTM Standard defines a historical REC (HREC) as:

“A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

The ASTM Standard indicates that “this practice is intended to permit a user to satisfy one of the 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: that is, the practice that constitutes ‘all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice,’ as defined at 42 USC, §9601(35)(B).”

1.2 Scope of Work

The following tasks, prescribed in the ASTM Standard, were completed by GEI as part of this Phase I ESA:

- Records Review: Review of environmental, physical, and historical use record sources considered to be publicly available, practically reviewable, and obtainable within reasonable time and cost constraints (i.e., reasonably ascertainable).
- Property Reconnaissance: Observation of the exterior condition of the Property and nearby sites (if visually or physically observable during reconnaissance of the Property), and interior condition of structures on the Property, if present.
- Interviews: Interviews with current and previous owners, operators and occupants of the Property; local and/or state government officials; and owners, operators and occupants of nearby sites, where applicable.
- Report: Evaluation of information collected and preparation of a written report.

Unless otherwise specified in Section 5, this Phase I ESA does not include a discussion of the “non-scope considerations” identified in the ASTM Standard, including asbestos-containing building materials, lead-based paint, lead in drinking water, wetlands, mold, and radon. No sampling or testing of materials (e.g., soil, water, air, and building materials) was conducted as part of this Phase I ESA.

Photographic documentation of the Property reconnaissance is included in Appendix A. Resumes of GEI personnel involved with this Phase I ESA are included in Appendix B.

1.3 Significant Assumptions

GEI assumes that information provided by Client, or “user” of this report (as defined in the ASTM Standard), if different than Client, and all other individuals interviewed as part of this Phase I ESA is accurate and complete.

GEI assumes that maps, verbal descriptions, or other representations of the boundaries of the Property provided by Client, user, key site manager, and/or local government sources are accurate and complete. GEI did not seek to independently verify the boundaries of the Property as part of this Phase I ESA.

GEI assumes this report will be read as a whole by the user, and as such, does not advise the use of segregated sections of this report.

1.4 Limitations and Exceptions

This assessment was conducted in general accordance with good commercial, customary, and generally accepted practices for assessments of similar property conducted in this geographical location and at this time. Per the ASTM Standard, not every property will warrant the same level of assessment.

This assessment is not exhaustive and no environmental assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with the Property; rather, per the ASTM Standard, "Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property, and this practice recognizes reasonable limits of time and cost."

Opinions presented in this report are based on observations completed at the time of the reconnaissance and information that was reasonably ascertainable as of the issuance date of this report. Property conditions observed and information obtained at a later date and under other circumstances may be different than those observed and obtained during this assessment.

Environmental conditions and regulations are subject to change and re-interpretation, and as such, current observations, conditions, or regulatory positions may not represent conditions at some future time. No warranty, either expressed or implied with regard to the site conditions, or Client's ability to assert any defense under CERCLA or any comparable state law for environmental impairment, is contained herein.

Per the ASTM Standard, this assessment may be presumed to be valid if completed less than 180 days prior to the date of acquisition of the Property (i.e., the date on which a person acquires title to the Property) or, for transactions not involving an acquisition, the date of the intended transaction. This assessment may be presumed to be valid for a period of up to one year prior to the date of acquisition or intended transaction if certain components (e.g., interviews, review of government records, visual inspection of the Property, and others identified in Section 4.6 of the ASTM Standard) are conducted or updated within 180 days of the date of acquisition or the date of the intended transaction.

Additional information concerning limitations and data gaps is presented in Section 8 of this report. Deletions and deviations from the ASTM Standard, if any, including any Client-imposed constraints, are also identified in Section 8 of this report.

1.5 Special Terms and Conditions

The Phase I ESA was conducted in general accordance with GEI's proposal for service dated March 16, 2018.

1.6 User Reliance

This report was prepared for the exclusive use of Client for the purpose of evaluating potential environmental liabilities associated with the Property. Reliance on this report by anyone other than Client is done at the sole risk of the user.

2. Property Description

2.1 Location and Legal Description

The Property is located west of North Harlem Avenue and north of Chicago Avenue and consists of three contiguous properties. The buildings on the Property include addresses of 800 North Harlem Avenue, 818 North Harlem Avenue, and 822 North Harlem Avenue. Property information obtained from the City, County, and/or Client is included in Appendix C. The Property location is illustrated on a Property Location Map (based on a United States Geological Survey topographic map) and Property Features Diagram (based on an aerial photograph) presented as Figures 1 and 2, respectively.

2.2 Property and Vicinity General Characteristics

The Property can also be described as being in the central portion of Cook County, southeastern portion of the Village of River Forest, and in an area of mixed commercial and urban residential land use. Information obtained from the Cook County Assessor indicates the three buildings located on the Property are primarily situated on six contiguous parcels (Cook County Parcel Nos. 15-01-418-016 to 15-01-418-021); two parcels measure approximately 5,835 square feet (Cook County Parcel Nos. 15-01-418-020 and 15-01-418-021) and four parcels measure approximately 9,200 square feet (Cook County Parcel Nos. 15-01-418-016 to 15-01-418-019).

800 North Harlem Avenue occupies four parcels (Cook County Parcel Nos. 15-01-418-018 to 15-01-418-021) and is developed with an approximately 7,400 square-foot single-story commercial building and asphalt-paved parking lot. The building can be accessed from North Harlem Avenue and Chicago Avenue.

818 North Harlem Avenue occupies one parcel (Cook County Parcel No. 15-01-418-017) and is developed with an approximately 1,700 square-foot multi-story residence and detached garage.

822 North Harlem Avenue occupies one parcel (Cook County Parcel No. 15-01-418-016) and is developed with an approximately 1,500 square-foot multi-story residence and detached garage.

Overall topography in the area appears to be relatively flat. The general drainage pattern for 800 North Harlem Avenue appears to be away from the building and toward trench drains located at two entrances on North Harlem Avenue and one entrance on Chicago Avenue. The general drainage pattern for 818 and 822 North Harlem Avenue appears to be from west to east toward a storm water inlet located on the northwest corner of North Harlem Avenue and Chicago Avenue.

2.3 Current Use of the Property

The Property is currently owned by three entities; TCF Bank (800 North Harlem Avenue), Mr. Khan Sam (818 North Harlem Avenue) and Mr. Aaron Johnson (822 North Harlem Avenue). The TCF Bank building is primarily used as a bank with a vault, teller areas, individual office spaces,

meeting spaces, and mechanical room and has been occupied for similar use since at least 1987. Available information suggests that from at least 1930 to 1978, the southern portion of the Property was developed with two commercial buildings of varying configurations. Reasonably ascertainable information suggests the properties including 818 and 822 North Harlem Avenue are currently used as single-family residences and have been occupied for similar use since their construction in 1924.

2.4 Property Improvements

The Property is currently improved with three buildings; an approximately 7,400-square-foot, single-story commercial building constructed on a concrete slab foundation lacking a basement or crawl space (800 North Harlem Avenue); an approximately 1,700-square-foot multi-story residential building constructed with a basement foundation (818 North Harlem Avenue); and an approximately 1,500-square-foot multi-story residential building constructed with a basement foundation (822 North Harlem Avenue). The Property is serviced by public potable water, public sanitary sewer, electrical, natural gas, and telecommunication services. The commercial buildings on the Property are heated and cooled with industrial natural gas-fired heating and cooling systems.

2.5 Current Uses of Adjoining Sites

GEI observed adjoining sites during the site reconnaissance to identify potential RECs concerning the Property. Adjoining sites were observed from the Property and public right-of-way (ROW) areas, and the occupants of the sites were not contacted as part of this Phase I ESA.

The Property is bound to the north by a residential building (826 North Harlem Avenue); to the east by North Harlem Avenue, with contiguous commercial/retail buildings (801 to 811 North Harlem Avenue and 1146 Chicago Avenue) and townhouses (813 to 825 North Harlem Avenue) located beyond; to the south by Chicago Avenue, with two service stations (727 and 754 North Harlem Avenue) and residential building (755 Bonnie Brae Place) located beyond; and to the west by residential buildings (803 through 825 Bonnie Brae Place).

Visual observation of the adjoining sites, from the Property or public ROW areas, did not result in the identification of potential environmental conditions for the Property.

3. User Provided Information

The ASTM Standard describes Phase I ESA tasks to be performed by the “user” that may help identify the possibility of RECs in connection with the Property. The tasks to be completed by the user include a review of title and judicial records for the Property and communication to the environmental professional (i.e., GEI) of specialized knowledge or experience, actual knowledge of any environmental lien or activity and use limitations, reasons for a significantly lower purchase price versus fair market value, and commonly known or reasonably ascertainable information within the local community associated with the Property.

A questionnaire was presented to the user (i.e., Client) to assist with completion of the tasks above. A copy of the completed “User Questionnaire” is included in Appendix D and a discussion of information provided by the Client is presented below.

3.1 Title Records

Title and judicial records for the Property were not made available to GEI by the issuance date of this report, and as such, a review of such records for environmental liens or activity and use limitations was not completed as part of this Phase I ESA.

3.2 Environmental Liens or Activity and Use Limitations

Client representatives did not identify known or suspected environmental liens or activity and land use limitations associated with the Property.

3.3 Specialized Knowledge

Client representatives indicated that they do not have specialized knowledge or experience associated with the Property.

3.4 Commonly Known or Reasonably Ascertainable Information

Client representatives indicated that they are not aware of commonly known or reasonably ascertainable information associated with the Property other than that which might be presented in previous reports prepared for the Property and shared with GEI as part of this Phase I ESA.

3.5 Valuation Reduction for Environmental Issues

Client representatives did not indicate that the purchase price of the Property is significantly lower than the market value due to known or perceived environmental issues.

3.6 Owner, Property Manager, and Occupant Information

The Property is currently owned by three separate entities; TCF Bank (800 North Harlem Avenue), Mr. Khan Sam (818 North Harlem Avenue), and Mr. Aaron Johnson (822 North Harlem Avenue). Ms. Fran Skala, Vice President of Property Development, TCF Bank; Ms. Deborah Hill, Owner of Hill Law Offices and attorney for 818 North Harlem Avenue; and Mr. Ruben Ruban, Assistant Vice President, SVN and broker for 822 North Harlem Avenue were identified as the Property representatives (i.e., key site managers) and interviewed as part of this Phase I ESA.

3.7 Reason for Performing Phase I ESA

This Phase I ESA was conducted on behalf of Client to identify potential environmental liabilities associated with the Property. Completion of a Phase I ESA in conformance with the ASTM Standard may satisfy one of the requirements for pursuit of an innocent landowner, contiguous property owner, or bona fide prospective purchaser defense to CERCLA liability.

3.8 Previous Reports and Other Information

Client indicated that they are not aware of any pending, threatened, or past litigation, proceedings, or notices of violation with respect to petroleum products or other hazardous substances associated with the Property (refer to Section 7).

4. Records Review

The purpose of the records review was to obtain and review environmental records that will help identify RECs in connection with the Property, and historical use records that will help develop a history of the previous uses of the Property and surrounding area, to help identify the likelihood of past uses having led to RECs in connection with the Property. Per the ASTM Standard, the user and environmental professional are not obligated to obtain and review every possible record that might exist with respect to the Property; rather, only records that are publicly available, practically reviewable, and obtainable within reasonable time and cost constraints (i.e., reasonably ascertainable) are required to be reviewed.

4.1 Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR), a subcontract environmental records search firm, reviewed current federal and state environmental databases for references to the Property and other hazardous waste and potentially impaired sites within specified minimum search distances from the Property. The EDR Radius Map Report, included in Appendix E, identifies the database sources and distances searched by EDR, and provides a summary of environmental record listings for the Property and surrounding sites. The databases reviewed by EDR those available as of May 4, 2018.

The Property addresses were not identified in any databases searched by EDR as part of this Phase I ESA.

The following is a summary of the number of other sites identified in databases within the respective minimum search distances from the Property:

- Superfund Enterprise Management System (SEMS) database– one site
- Federal RCRA-Small Quantity Generators (SQG) list – three sites
- Federal RCRA-Conditionally Exempt Small Quantity Generators List (CESQG) list – two sites
- Illinois LUST list – 18 sites
- Illinois LUST TRUST list – one site
- Illinois UST list – three sites
- Illinois Engineering Controls list – two sites
- Illinois Institutional Control list – three sites
- Illinois Site Remediation Program (SRP) list – five sites
- Drycleaners list – one site
- EDR Proprietary Historical Auto Stations list – three sites

- EDR Historical Cleaners list – three sites

Sites listed in the EDR report were reviewed for applicable search radii, regulation status, distance, topography, and gradient with respect to the Property. Regional groundwater flow direction is anticipated to be east toward Lake Michigan. Locally, groundwater flow direction is anticipated to be toward the Des Plaines River, which is approximately 1.5 miles west of the Property. Sites identified by EDR within applicable search distances considered hydraulically downgradient or sidegradient were generally considered unlikely to pose potential environmental conditions to the Property, unless they were identified as having a known release of petroleum products or hazardous substances (e.g., LUST, etc.), and the distance of the site from the Property or other factors were such that the release could be considered to have a reasonable potential to result in subsurface vapor migration onto the Property.

Database listings for immediately adjoining and upgradient sites considered to have a reasonable potential to pose potential environmental conditions to the Property are discussed below.

Adjoining Sites

Based on a review of the EDR report and other information obtained as part of this Phase I ESA (e.g., historical references, Property reconnaissance observations, etc.), the following EDR listings are associated with sites that adjoin the Property:

754 North Harlem Avenue (EDR Hist Auto, UST, LUST, RCRA-SQG)

Based on reasonably ascertainable information, the 754 North Harlem Avenue listings are associated with a southern adjoining site that was observed during the reconnaissance to be developed as a Mobil gas station. Historically, the south adjoining site appears to have been developed as a filling and service station as early as 1947.

The EDR report identifies Joes Arco Service Station in the Historical Auto Stations list between 1974 and 2014 in which various names were adopted for the gasoline service station including Joes Arco Service Station (1974-1980, 1982, 1983); River Forest Minimart (1980, 1982, 1983, 1985-1997); and Excel Oil Corp. (1998-2014).

The UST and LUST listings appear to be associated with Mobil Oil #13075 located at 754 North Harlem Avenue. The EDR report suggests that three 10,000-gallon capacity gasoline USTs were installed on the southern adjoining site, south of Chicago Avenue, on June 18, 1986. The tanks were inspected and issued green tag decal #R000051 on June 22, 2016, and the tags and inspection expires on December 31, 2018. A green tag decal indicates compliance status for UST facilities and allows for the deposit of petroleum, petroleum product, hazardous substances, or regulated substances into the UST. The last passing test is dated May 22, 2016 and expires on May 22, 2019. According to the EDR report, an apparent gasoline release from one of the USTs was reported to the Illinois Environmental Management Agency (IEMA) in September 2006. Subsequently, the Illinois EPA opened Incident Number 20061190 and sent a No Further Action/No Further Remediation (NFA/NFR) letter dated April 27, 2012. Based on information provided and the presumably sidegradient location of the site, the UST and LUST listings are not considered an REC.

The EDR report lists Mobil Oil Corp SS A1L in the RCRA-SQG database. The southern adjoining site applied for qualification as a small quantity generator on March 1, 2000. Previously, in 1991, Mobil Oil Corp SS A1L applied to be a small quantity generator of ignitable waste and lead. According to the EDR report, no violations relating to waste generation were found associated with the site. As such, the listing in the RCRA-SQG database is not considered an REC.

727 North Harlem Avenue (EDR Hist Auto, UST, RCRA-SQG, RCRA-CESQG, LUST, SPILLS, BOL)

Based on reasonably ascertainable information, the 727 North Harlem Avenue listings are associated with a southeastern adjoining site that was observed during reconnaissance to be developed as a BP gas station. Historically, this site appears to have been developed as a filling and service station as early as 1951.

The EDR report identifies Mc Clains Standard Service in the Historical Auto Stations list between 1969 and 2014. Various names were associated with the service station including Mc Mahon Richard (1969-1971); Vines Standard Service (1972-1975); Mc Clains Standard Service (1973-1977); Caruso Enterprises Inc. (1977-1982); 727 North Harlem Inc. (1986-1990); Oak Park Amoco (1992-1994); Oak Park Amoco Inc. (1995-2014); and Chicago Harlem BP (2010-2014).

The EDR report identifies Amoco 5311 in the RCRA-SQG and RCRA-CESQG databases. According to the report, Amoco 5311 applied to be considered a small quantity generator on August 20, 1993 for ignitable waste. On October 22, 2007 Amoco applied to be a conditionally exempt small quantity generator of ignitable waste and benzene; however, previously the site was classified as a small quantity generator of ignitable waste and lead. The EDR report does not identify any violations associated with the waste generator classification. As such, the RCRA-SQG and RCRA-CESQG listings are not considered an REC.

The EDR report identifies Amoco 5311 in the UST database. The listing appears to be associated with four USTs. A 550-gallon capacity used oil tank installed on January 1, 1988 was inspected and received green tag decal #T000005 on January 3, 2018 and expires on December 31, 2020. A 10,000-gallon capacity gasoline tank installed on January 1, 1971 was inspected and received green tag decal #T000005 on January 3, 2018 and expires on December 31, 2020. Two 10,000-gallon capacity gasoline tanks installed on January 1, 1971 were last used on August 22, 2017. Both tanks were inspected and received green tag decal #T000005 on January 3, 2018 and expire on December 31, 2020. The EDR report does not indicate if the two 10,000-gallon capacity tanks were removed or abandoned.

The EDR report identifies Amoco 5311 in the LUST, SPILLS, and BOL databases. According to the EDR report, the listings are associated with a spill from two 10,000-gallon gasoline USTs reported on August 16, 2017. It appears the Office of Illinois State Fire Marshall (OSFM) was on-site during an annual pressure test which reportedly failed presumably because both lines (premium and mid-grade) were observed leading to the submersible turbine pump (STP) pit. The EDR report suggests the pumps were shut down and repairs were performed following the initial report. Incident report number H-2017-1059 was assigned to the spill by the Illinois

Environmental Management Agency (IEMA). Incident report number 20171059 was assigned to the spill by Illinois Environmental Protection Agency (IEPA) on August 16, 2017. The EDR report does not indicate that a pre-1974 letter was sent by the owner or that an NFA/NFR letter was sent by the IEPA. Based on the available records and assumed sidegradient location of the southeastern adjoining site, the LUST, SPILLS, and BOL listings do not present an environmental concern for the Property.

Other Mapped Sites

Based on the nature of the environmental records, the inferred hydrological gradient and/or subsurface soils, distances from the Property, and/or status of the environmental records with the relevant regulatory authority, it is our opinion that database listings for other mapped sites are unlikely to pose potential environmental conditions to the Property.

Unmapped Properties

The EDR report did not identify any “orphan” database listings, which are environmental records associated with a site that have incomplete or erroneous address information.

4.2 Additional Environmental Record Sources

GEI attempted to review local records and/or additional state or tribal records to supplement standard environmental record sources reviewed in Section 4.1. Local records and/or additional state or tribal records were reviewed if they were considered reasonably ascertainable and sufficiently useful, accurate, and complete based on previous experience with the record sources. Local records and/or additional state or tribal records for surrounding sites were not reviewed, unless otherwise indicated, as they were considered not to be obtainable within reasonable time and cost constraints (i.e., not reasonably ascertainable).

4.2.1 Village of River Forest

GEI submitted a FOIA request to the Village of River Forest to obtain reasonably ascertainable records concerning the Property. Records were not available for the residential addresses 818 and 822 North Harlem Avenue on the Property. Notable records provided by the Village for 800 North Harlem Avenue include:

- Permit No. 70-364 issued on May 19, 1970 by the Metropolitan Sanitary District of Greater Chicago for sanitary sewer connection for House of Pies. The following special condition was listed, “all drains from service area shall be connected to grease trap.” An attached map depicted the grease trap in the south-central portion of the building.
- A Request for Final Inspection and Approval for the House of Pie Addition dated November 1972.
- A Fire Alarm Report dated December 17, 1975 issued by the River Forest Fire Department indicated a grease fire was extinguished with a carbon dioxide and dry

chemical extinguisher at the House of Pies. The report also noted that a gas pipe had broken.

- A Fire prevention survey/inspection dated June 29, 1992 completed by the Village of River Forest Fire Department indicated the rear portion of the building was unoccupied.
- Fire inspection records for various prior occupants of 800 North Harlem Avenue including: Original House of Pies (1970-1980); Life Savings & Loan (1981-1986); R.J. McGough Associates, Inc. (1982-1984); M&R Security (1984); Jenny Craig Weight Loss Centre (1985-1991); TCF Banking & Savings (1987-1991); TCF Bank (1993-2016). Violations relating to petroleum product or hazardous substance storage were not indicated.
- A report dated July 12, 2016 for overpressure rupture of air gas pipe/pipeline in a hole within parkway along Chicago Avenue indicated a natural gas odor was observed and levels were taken with the gas meter recorded 15-23% of LEL a few inches below grade and 12-15% of LEL a foot above grade. The report indicated NiGas took their own readings and state a hole was dug by one of their contractors working in the area.

Copies of the records reviewed from the Village's files are included in Appendix F.

4.2.2 Village of River Forest Fire Department

GEI contacted the Village of River Forest Fire Department to obtain reasonably ascertainable information and records concerning the Property. The River Forest Fire Department records were provided by the Village of River Forest with the FOIA request (refer to Section 4.2.1). Fire Marshal Kevin Wiley provided information concerning spills, Fire Department responses, and Fire department inspections associated with the Property (refer to Section 7).

4.2.3 Office of the Illinois State Fire Marshal

GEI submitted a FOIA request to the OSFM and accessed the OSFM UST database to obtain information related to USTs which may have been registered for the Property. The Property was not identified in the OSFM database.

Copies of pertinent search results obtained from the OSFM are included in Appendix F.

4.2.4 Illinois Environmental Protection Agency

GEI accessed the IEPA online LUST database to obtain information related to LUST cases on the Property. The Property was not identified in the IEPA online LUST database.

Copies of pertinent records obtained from the IEPA are included in Appendix F.

4.3 Physical Setting Sources

Published physical setting sources were reviewed to obtain topographic, soil, and groundwater depth and flow direction information for the Property and vicinity, in order to further assess the potential for petroleum products or other hazardous substances to migrate to, from, or within the Property.

The Illinois State Geological Survey publication, *Geologic Atlas of Cook County for Planning Purposes, 2011*, indicates that the Property is in an area of Cook County situated on the eastern flank of the southward-plunging Wisconsin Arch. Silurian age bedrock thickens eastward into the Michigan Basin, and the underlying Cambrian and Ordovician strata thicken southward into the Illinois Basin. Bedrock in the vicinity of the Property is covered by up to 300 feet of unlithified surficial materials consisting of clay, silt, and sand and gravel deposited primarily by glacial processes. It is reported that Silurian age dolomite is the uppermost bedrock in the vicinity of the Property.

The U.S. Department of Agriculture, Natural Resource Conservation Service (NRCS) Web Soil Survey indicates that the primary soil series mapped at the Property location is Urban land and Alfic Udarents, clayey-urban land – Elliott complex. The Alfic Udarents, clayey-urban land – Elliott complex has a depth to restrictive feature of 48 to 66 inches, is moderately well drained and is found at the summit of ground moraines and lake plains.

Regional groundwater flow direction is anticipated to be east toward Lake Michigan. Locally, groundwater flow direction is anticipated to be toward the Des Plaines River, which is located approximately 1.5 miles west of the Property. However, existing ditches, underground utilities, and other natural and manmade features may influence local groundwater flow direction. Determination of existing groundwater conditions at the Property, including depth and flow direction, would require installation and assessment of groundwater monitoring wells.

A 7.5-minute topographic map of River Forest, Cook County, Illinois, quadrangle (dated 2018) shows the area topography and surface water features in and around the Property. The topographic map shows the Property as being in an urban area of relatively low relief with approximate elevation ranging between +620 and +630 feet above MSL. Overall topography in the area is shown to slope generally to the west toward the Des Plaines River. Buildings and other structures of note are not illustrated on the Property or on adjacent sites.

4.4 Historical Use Information

The objective of consulting historical sources was to develop a history of the previous uses of the Property and surrounding area, to help identify the likelihood of past uses having led to RECs in connection with the Property.

4.4.1 Sanborn Fire Insurance Maps

GEI requested reasonably ascertainable Sanborn Fire Insurance (Sanborn) maps from EDR. The EDR Certified Sanborn Map Report, included in Appendix G, indicates that Sanborn maps dated 1895, 1908, 1930, 1947, 1950, 1951, and 1975 are available for the Property location.

The Sanborn maps dated 1895 and 1908 do not include the Property, but show structures located east of North Harlem Avenue. The maps show the east adjoining sites as being occupied by two contiguous dwellings. The southeast adjoining site is shown vacant.

The Sanborn map dated 1930 shows the Property as occupied by an office building in the southeast corner of the Property and a dwelling with detached garage located at 818 North Harlem Avenue and similarly at 822 North Harlem Avenue. Adjoining sites to the north, west, and southwest are shown developed with dwellings and detached garages. The adjoining site to the south is shown vacant.

The Sanborn maps dated 1947 and 1950 do not include the Property, but show structures east of North Harlem Avenue. The adjoining site to the east is shown occupied by contiguous stores and two dwellings. The adjoining site to the southeast is shown occupied by a filling station with three tanks located in the northeast corner of the site.

The 1951 Sanborn map shows the structures west of North Harlem Avenue including the Property. The Property is shown to include a small store on the east side (historical address of 7208 Chicago Avenue) and a larger store on the west side of the southern portion of the Property, and two dwellings with detached garages on the northern portion of the Property. The eastern and southwestern adjoining sites are shown occupied by dwellings with detached garages. The southern adjoining site is shown occupied by a filling and greasing station including three gas tanks.

The two 1975 Sanborn maps show the Property as occupied by a commercial building and store on the southern portion of the Property, and two dwellings with detached garages on the northern portion of the Property. The adjoining sites are shown occupied by dwellings to the north, east, west, and southwest; contiguous stores to the east; a filling and service station to the south; and commercial building to the southeast.

4.4.2 Aerial Photographs

GEI reviewed reasonably ascertainable historical aerial photographs dated 1938, 1951, 1962, 1972, 1978, 1983, 1988, 1994, 1999, 2005, 2009, and 2012 obtained from EDR and included in Appendix G. A description of pertinent observations for the property and surrounding area, based on available photographs, is provided below.

Historical aerial photograph dated 1938 appears to show the Property as occupied by two residential buildings to the north and a small structure in the southeast corner. The surrounding sites are generally occupied by residential buildings. The southern adjoining site appears to be occupied by a building on the north portion and vacant lot on the remaining portion.

Historical aerial photographs dated 1951 and 1962 generally show the Property as occupied by two residential building on the northern portion and a parking lot and building on the southern portion. Adjoining sites appear to be occupied by residential and commercial buildings.

Historical aerial photographs dated 1972 and 1978 generally show the Property and surrounding sites as occupied similar to the 1962 photograph except; the building on the southern portion of the Property appears to be smaller.

Historical aerial photographs dated 1983 and 1988 generally show the Property and surrounding sites as occupied similar to the 1978 photograph except the building on the southern portion of the Property appears to have an addition on the northwestern corner of the building.

The 1994, 1999, 2005, 2009, and 2012 aerial photographs generally show the Property as being redeveloped with the existing building. Surrounding sites appear similar to the 1988 aerial photograph.

4.4.3 Topographic Maps

GEI reviewed reasonably ascertainable historical topographic maps provided by EDR. EDR provided topographic maps dated 1891, 1893, 1900, 1901, 1928, 1953, 1963, 1972, 1978, 1980, 1993, 1997, 1998 and 2012. Copies of historic topographic maps obtained from EDR are included in Appendix G. Pertinent historical use information obtained from a review of the topographic maps is provided below.

The topographic maps dated 1891, 1893, 1900, and 1901 (Riverside Quad, 15-minutes series) illustrate the alignment of the streets near the Property and development of River Forest, Oak Park, and Ridgeland areas.

The topographic map dated 1928 (River Forest, 7.5-minute series) illustrates the alignment of the streets near the Property and appears to show contiguous buildings on the northern portion of the Property and continues north of the Property.

The topographic maps dated 1953, 1963, 1972, 1978, 1980, 1993, 1997, and 1998 (River Forest, 7.5-minute series) illustrate the alignment of the streets near the Property, but no longer illustrate buildings on the property or surrounding sites.

The 7.5-minute series topographic map dated 2012 for the Chicago Loop Quad illustrates the alignment of the streets near the Property. This map does not show buildings on the Property or nearby sites (other than schools and landmark buildings); rather, the Property and nearby sites are illustrated as being in an urban area.

4.4.4 City Directories

GEI reviewed reasonably ascertainable city directory information provided by EDR dated 1970, 1977, 1982, 1988, 1993, 2000, 2004, and 2009. A copy of the EDR City Directory Abstract is included in Appendix G. Pertinent information provided by the abstract includes:

Directory Year	Property Listing	Adjoining Site Listings
1970	800 North Harlem Ave: Kroger Co 818 North Harlem Ave: Somers, John D. 822 North Harlem Ave: Anderson R T 7208 Chicago Ave: Gallagher A H	754 North Harlem Ave: Bills Sinclair (south adjoining) 838 North Harlem Ave: Kohut, Nester C. (north) 1146 Chicago Ave: Douglas Drugs (east adjoining)
1977	800 North Harlem Ave: House of Pies Orgnl; The Orgnl Hse Pies 818 North Harlem Ave: XXXX 822 North Harlem Ave: Wehrenberg R A 7208 Chicago Ave: Gallagher A H	754 North Harlem Ave: Joes Arco SV Sta (south adjoining) 826 North Harlem Ave: Roughley E (north adjoining) 1146 Chicago Ave: Douglas Drugs; Ger El Arms Phrmcy (east adjoining)
1982	800 North Harlem Ave: Life Savings & Loan 818 North Harlem Ave: XXXX 822 North Harlem Ave: Keller H Jr 7208 Chicago Ave: Gallagher A H & Asc; Gallagher A RL Est	754 North Harlem Ave: Arco Mini Market; River For Mini Mart (south adjoining) 826 North Harlem Ave: Roughley E (north adjoining) 1146 Chicago Ave: Douglas Drugs; Douglas Drugs Inc (east adjoining)
1988	800 North Harlem Ave: Jenny Craig Wght Ct; TCF Banking & Savings 818 North Harlem Ave: XXXX 822 North Harlem Ave: XXXX 7208 Chicago Ave: Gallagher A H & Assoc; Gallagher A RL Est	754 North Harlem Ave: Arco Mini Market; River For Mini Mart (south adjoining) 826 North Harlem Ave: XXXX (north adjoining) 1146 Chicago Ave: Century 21 Earth; Century 21 SLS OFC (east adjoining)
1993	800 North Harlem Ave: TCF Bank FSB; TCF Bank FSB LNDG 818 North Harlem Ave: XXXX 822 North Harlem Ave: XXXX 7208 Chicago Ave: River Park Realty	754 North Harlem Ave: Mobil Oil Mini Mart (south adjoining) 826 North Harlem Ave: XXXX (north adjoining) 1146 Chicago Ave: B C Realtor; Century 21 Prop (east adjoining)
2000	800 North Harlem Ave: TCF Bank Consumer Lending; TCF Bank Customer Serv 818 North Harlem Ave: Peters R D Jr. 822 North Harlem Ave: XXXX	754 North Harlem Ave: Mobil Mart Home Run Inn Pizza; Mobil Oil Mini Mart (south adjoining) 826 North Harlem Ave: XXXX (north adjoining) 1146 Chicago Ave: B C Realtor; Century 21 Classic Properties (east adjoining)
2004	800 North Harlem Ave: XXXX 818 North Harlem Ave: KHAM Sam 822 North Harlem Ave: SHARPE Brian	754 North Harlem Ave: Mobil Mart Home Run Inn Pizza; River For Mobile (south adjoining) 826 North Harlem Ave: SEGOVIA Maruicio (north adjoining) 1146 Chicago Ave: Century 21 Classic Properties; DIFEBO Frank (east adjoining)
2009	800 North Harlem Ave: XXXX 818 North Harlem Ave: KHAHN Sam	754 North Harlem Ave: Bell & River Mobile (south adjoining) 826 North Harlem Ave: CANALES T (north adjoining) 1146 Chicago Ave: Century 21 Classic Properties (east adjoining)

5. Supplemental Information

A Phase I ESA can include a review and/or assessment of “non-scope considerations” identified in the ASTM Standard, including asbestos-containing building materials, lead-based paint, lead in drinking water, wetlands, mold, radon, and others.

Client did not request this Phase I ESA to include a review and/or assessment of any “non-scope considerations” identified in the ASTM Standard.

6. Property and Adjoining Site Reconnaissance

The site reconnaissance was completed by Ms. Caitlin Krause, Staff Professional, of GEI, on May 14, 2018. Weather conditions at the time of the site reconnaissance were overcast with ambient temperatures between approximately 60 and 65 degrees Fahrenheit.

6.1 Methodology and Limiting Conditions

GEI observed the Property; surrounding sites, if visually or physically observable during reconnaissance of the Property; and interior and exterior of structures on the Property, if present, to obtain information concerning potential RECs in connection with the Property. Limiting conditions have the potential to be significant, depending on previous experience with similar property settings and uses, and other reasonably ascertainable information. A discussion of limiting conditions and data gaps encountered during this Phase I ESA is presented in Section 8 of this report.

6.2 General Setting

The Property can be described as being in the central portion of the County, southeastern portion of the Village, and in an area of mixed commercial and urban residential land use. Information obtained from the Cook County Assessor indicates the three buildings located on the Property are primarily situated on six contiguous parcels (Cook County Parcel Nos. 15-01-418-016 through 15-01-418-021); two southern parcels measure approximately 5,835 square feet and four northern parcels measure approximately 9,200 square feet.

The 800 North Harlem Avenue address occupies four parcels (Cook County Parcel Nos. 15-01-418-018 through 15-01-418-021) and is developed with an approximately 7,400 square-foot single-story commercial building and parking lot. The building can be accessed by two entrances on North Harlem Avenue and one entrance on Chicago Avenue. The 818 North Harlem Avenue address occupies one parcel (Cook County Parcel No. 15-01-418-017) and is developed with an approximately 1,700-square-foot multi-story residence with detached garage. The 822 North Harlem Avenue address occupies one parcel (Cook County Parcel No. 15-01-418-016) and is developed with an approximately 1,500-square-foot multi-story residence and detached garage.

Overall topography in the area appears to be relatively flat. The general drainage pattern for 800 North Harlem Avenue appears to be away from the building and toward three storm water catch basins located throughout the parking lot or toward trench drains located at each of the three entrances. The general drainage pattern for 818 and 822 North Harlem Avenue appears to be from west to east and toward a storm water inlet located on the northwest corner of North Harlem Avenue and Chicago Avenue.

6.3 Observations

6.3.1 Exterior Observations for the Property

TCF Bank located at 800 North Harlem Avenue, on the southern portion of the Property, was observed to consist of a building including six drive-thru lanes on the southern portion and an asphalt-paved parking lot to the north of the building. A refuse container area, electrical transformer, and utility gage were observed along the west exterior of the building. The parking lot generally appeared in good condition with limited amount of cracks. Three storm water catch basins were observed within the paved parking lot; one located just west of the northwest corner of the building; one located near the northwest corner of the parking lot; and one near the northern entrance off North Harlem Avenue. Trench drains were observed at all three entrances.

The residences at 818 and 822 North Harlem Avenue were generally observed to be in good condition. A concrete- and asphalt-paved driveway, accessible to both residences, was observed between the two parcels and was in generally fair condition with observed cracking. A single-car, detached garage was observed in the northwest corner of the 818 North Harlem Avenue parcel, and a single-car, detached garage was observed in the southwest corner of the 822 North Harlem Avenue parcel. An approximately 6-foot tall wooden fence bordered the backyard of each parcel. Two approximately 1.5-foot diameter metal access/manhole covers were observed on the Property; one located in the driveway between 818 and 822 North Harlem Avenue; and one located partially under the deck on the west side of 822 North Harlem Avenue residence. The word "sewerage" was observed on the manhole covers; however, GEI was unable to confirm the manhole connections. Outdoor storage of nonhazardous materials was observed on the west and north side of the residence at 818 North Harlem Avenue.

Except for outdoor storage of a 5-gallon capacity container of rust preventative and two car batteries along the north exterior of the garage at 818 North Harlem Avenue, observations of the Property exterior did not reveal ASTs or vent pipes, fill pipes, access ways, or other structures typically associated with USTs; drums or other containers of petroleum products or other hazardous substances; unidentified substance containers; electrical or hydraulic equipment known or suspected to contain PCBs; pits, ponds, or lagoons; wells, septic systems, or structures typically associated with private sewerage and potable water supply systems; wastewater or other liquid discharges into a drain, ditch, or other waterway; standing surface water or pools or sumps potentially containing petroleum products or other hazardous substances; indications of potential fill placement or improper solid waste disposal; strong, pungent, or noxious odors; stressed vegetation; or surface staining.

6.3.2 Exterior Observations for Surrounding Sites

GEI observed adjoining sites during the reconnaissance to identify potential RECs concerning the Property. Adjoining sites were observed from the Property or public right-of-way (ROW) areas, and the occupants of the sites were not contacted as part of this Phase I ESA.

The Property is bound to the north by a residential building (826 North Harlem Avenue); to the east by North Harlem Avenue, with contiguous commercial/retail buildings (801 to 811 North

Harlem Avenue and 1146 Chicago Avenue) and townhouses (813 to 825 North Harlem Avenue) located beyond; to the south by Chicago Avenue, with two service stations (727 and 754 North Harlem Avenue) and residential building (755 Bonnie Brae Place) located beyond; and to the west by residential buildings (803 through 825 Bonnie Brae Place).

Currently, the two southern adjoining service stations are occupied by BP and Mobil and the eastern adjoining commercial/retail buildings are occupied by a dance studio, cycling studio, pet shop, salon, and language & cultural center.

Visual observation of the adjoining sites did not reveal readily apparent ASTs, USTs, unidentified substance containers, ground surface staining, or other evidence suggesting the potential for environmental impairment except for the current use of two southern adjoining sites as service stations.

6.3.3 Interior Observations for Structures on the Property

The interior of the TCF Bank building was observed in good condition and generally consisted of individual office spaces, meeting rooms, an employee breakroom, vault, teller area, and building storage/mechanical room area (i.e., areas containing a fire suppression pump system, electrical controls, and plumbing, heating, and air conditioning systems). Building mechanical systems and piping were appropriately labelled per their hazards and City inspection forms and maintenance logs were present. Except for janitorial cleaning supplies and building maintenance products (e.g., bleach and paint), observation of the interior of the building did not reveal petroleum product or other hazardous substance storage, unidentified substance storage, staining, unusual odors, or other evidence of potential environmental impairment.

The interior of 822 North Harlem Avenue residence includes a living area, dining area, kitchen, bathrooms, and bedrooms. The basement was observed in good condition and generally consisted of a gas boiler, water heater, and connections for a washer and dryer. The wood-framed, detached garage located in the southwest corner of the parcel, was observed in good condition and generally consisted of personal storage and woodworking materials. Except for household cleaning supplies and woodworking supplies (e.g. paint and wood finish products), observation of the interior of the residence and garage did not reveal petroleum product or other hazardous substance storage, unidentified substance storage, staining, unusual odors, or other evidence of potential environmental impairment.

The interior of 818 North Harlem Avenue residence was not accessible by GEI during the time of reconnaissance. As such, the homeowners were interviewed and provided written responses to questions regarding ASTs, USTs, chemical storage, and electrical transformers on their property. Ms. Kimberly Sam, daughter of Mr. Khan Sam, indicated she is not aware of any current or former aboveground or underground storage tanks on the property, any current or former storage of chemicals, solvents, or paint on the property, or any current or former electrical transformers on the property. During site reconnaissance, a 5-gallon capacity container of rust preventative and two car batteries were observed along the northern exterior of the garage, with other nonhazardous material storage located north and east of the garage and north of the residence.

7. Interviews

Interviews were completed by Ms. Caitlin Krause (Staff Professional) of GEI. Individuals interviewed and information obtained is presented below and/or discussed in preceding sections of this report.

GEI asked Mr. Lee Winters and key site managers whether they were aware if any of the documents listed in Section 10.8.1 of the ASTM Standard (e.g., prior Phase I ESA reports, environmental compliance audit reports, environmental permits, AST and UST registrations, etc.) exist for the Property, and if so, whether copies of the documents could be provided to GEI for review as part of this Phase I ESA. Individuals interviewed as part of this Phase I ESA indicated that they are aware of prior documents, as discussed previously in Section 3.8.

Prior to the site reconnaissance, GEI also asked Mr. Winters and key site managers whether they were aware of: any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the Property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Property; and any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products. Individuals interviewed as part of this Phase I ESA indicated that they are not aware of any such litigation, proceedings, or notices.

7.1 Key Site Manager

Ms. Fran Skala, Vice President of Property Development for TCF Bank; Ms. Deborah Hill, Owner of Hill Law Offices and attorney for 818 North Harlem Avenue; and Mr. Ruben Ruban, Assistant Vice President for SVN and broker for 822 North Harlem Avenue were identified as the Property representatives (i.e., key site managers) and interviewed as part of this Phase I ESA.

Ms. Skala indicated the current TCF Bank building was constructed in 1973 and believes TCF Bank has occupied the building since the 1990s. The building consists of slab-on-grade foundation with no basement or crawl space and is heated/cooled with natural gas. According to Ms. Hill, the Sam family has occupied the residence at 818 North Harlem Avenue since 2001 and the residence is heated with natural gas and cooled by central air conditioning system. According to Mr. Ruban, the Johnson family has occupied the residence at 822 North Harlem Avenue for approximately five years. Mr. Ruban indicated, to the best of his knowledge, the site has been occupied by a residential building and detached garage since approximately 1923.

Mses. Skala and Hill and Mr. Ruban were not aware of any prior uses of, or potential environmental concerns with the Property; any environmental liens or activity/use limitations associated with the Property; any past or pending environmental litigation associated with the Property; any existing petroleum product or other hazardous substance storage tanks on the Property; or any fires or spills occurring on the Property.

7.2 Occupants

Ms. Sam was identified by Ms. Deborah Hill as an occupant of 818 North Harlem Avenue and was interviewed along with Ms. Hill about the Property.

7.3 Past Owners, Operators, and Occupants

Contact information for past owners, operators, and occupants was not reasonably ascertainable, and as such, interviews with those individuals were not conducted as part of this Phase I ESA.

7.4 State and/or Local Government Officials

GEI interviewed Mr. Kevin Wiley, Fire Marshal for the Village of River Forest, to obtain reasonably ascertainable information for the Property. According to Mr. Wiley, he is not aware of any current or former storage tanks on the Property and is not aware of any former or outstanding fire code violations relating to petroleum product or hazardous substance storage on the Property. Mr. Wiley also indicated that he is not aware of any responses to the Property for spills or fires.

8. Evaluation

8.1 Data Gaps

A data gap is defined as the lack of or inability to obtain information required by the ASTM Standard despite good faith efforts to gather such information. A data gap by itself is not inherently significant. Data failure is one type of data gap, and is defined as a failure to achieve the historical research objectives in Sections 8.3.1 through 8.3.2.2 of the ASTM Standard, even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Data gaps and data failure (if any) encountered during performance of this Phase I ESA, as well as a discussion of their significance, is presented below.

- Title and judicial records for the Property were not made available to GEI by the issuance date of this report, and as such, a review of such records for environmental liens or activity and use limitations was not completed as part of this Phase I ESA.
- GEI was unable to fully assess the interior structures located at 818 North Harlem Avenue during the site reconnaissance including the basement and garage.
- GEI was unable to fully assess the use of the Property prior to 1930.

The ASTM Standard defines an environmental lien as “A charge, security, or encumbrance upon title to a property to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products upon a property, including liens imposed pursuant to CERCLA 42 U.S.C. §§9607(1) & 9607(r) and similar state and local laws.” The ASTM Standard defines activity and use limitations as “legal or physical restrictions or limitations on the use of, or access to, a site or facility: (1) to reduce or eliminate potential exposure to hazardous substances or petroleum products..., or (2) to prevent activities that could interfere with the effectiveness of a response action...” Other reasonably ascertainable information, including the EDR report, does not suggest that state- or federal-funded petroleum product or other hazardous substance response actions, cleanup, or remediation activities have occurred on the Property. Therefore, it is considered unlikely that environmental liens exist with respect to the Property. Based on the information above, the inability to review the results of a title and judicial records search for the Property is not considered a significant data gap.

Ms. Kimberly Sam, daughter of Mr. Khan Sam, was interviewed and subsequently provided written responses to questions regarding conditions of the interior of the residence. Ms. Sam indicated she is not aware of any current or former aboveground or underground storage tanks on the property, any current or former storage of chemicals, solvents, or paint on the property, or any current or former electrical transformers on the property. During site reconnaissance, a 5-gallon capacity container of rust preventative and two car batteries were observed along the northern exterior of the garage, with other nonhazardous material storage located north and east of the garage and north of the residence. Based on the exterior observations, GEI anticipates general housekeeping will be necessary for the interior structures as well. Based on information provided

by the current owner, it is considered unlikely that observing the interior structures at 818 North Harlem Avenue would result in the identification of a REC and the inability to fully assess the interior buildings at 818 North Harlem Avenue during the site reconnaissance is not considered a significant data gap.

The inability to fully assess the use of the Property prior to 1930 is not considered a significant data gap given that the Property appears to have been partially undeveloped and partially developed for residential and commercial use since 1930, and based on the Property location, was likely undeveloped or developed for similar use prior to that time. It is considered unlikely that additional information concerning historical uses of the Property prior to 1930, if available at some future time, would result in the identification of a REC.

8.2 Deviations

Deletions and deviations from the ASTM Standard practice, including Client/user-imposed constraints, and any additions (e.g., non-scope considerations) to the practice, are required to be listed individually and in detail as part of this report.

GEI is not aware of any deletions or deviations from, or any additions to, the ASTM Standard that were completed as part of this Phase I ESA, except for the supplemental information provided in Section 5 of this report.

8.3 Findings

The Property includes three contiguous properties located at 800 North Harlem Avenue, 818 North Harlem Avenue, and 822 North Harlem Avenue in the Village of River Forest, Cook County, Illinois. The Property consists of one commercial property and two neighboring residential properties owned by three separate entities; TCF Bank (800 North Harlem Avenue), Mr. Khan Sam (818 North Harlem Avenue), and Mr. Aaron Johnson (822 North Harlem Avenue). The Property is developed with a single-story building that was constructed in 1973 (800 North Harlem Avenue), a multi-story residence constructed in 1924 (818 North Harlem Avenue), and a multi-story residence constructed in 1924 (822 North Harlem Avenue). Information obtained from the Cook County Assessor indicates that TCF Bank, a 7,400 square-foot building, is primarily situated on an approximately 37,000 square-foot property consisting of four parcels (Cook County Parcel Nos. 15-01-418-018 through 15-01-418-021). Each residence is primarily situated on an approximately 9,000 square-foot property and consists of one parcel (Cook County Parcel No. 15-01-418-017 and 15-01-418-016). The Property is in a mixed residential and commercial land use area this is serviced by public potable water, public sanitary sewer, electrical, natural gas, and telecommunications services.

Ms. Fran Skala, Vice President of Facilities Lakeshore Division of TCF Bank (800 North Harlem Avenue); Ms. Deborah Hill, Owner of Hill Law Offices (818 North Harlem Avenue); and Mr. Ruben Ruban, Assistant Vice President of SVN (822 North Harlem Avenue), were identified as the Property representatives (i.e., key site managers) and interviewed as part of this Phase I ESA. Ms. Skala indicated the current TCF Bank building was constructed in 1973; however, TCF Bank has occupied the building since the 1990s. The building consists of slab-on-grade foundation with

no basement or crawl space and is heated/cooled with natural gas. Ms. Hill indicated the Sam family has occupied the residence at 818 North Harlem Avenue since 2001. The residence is heated with natural gas and cooled by central air conditioning system. According to Mr. Ruban, the Johnson family has occupied the residence at 822 North Harlem Avenue for approximately five years. Mr. Ruban indicated, to the best of his knowledge, the site has been occupied by a residential building and detached garage since approximately 1923. Mses. Skala and Hill and Mr. Ruban are not aware of any prior uses of, or potential environmental concerns with the Property; any environmental liens or activity/use limitations associated with the Property; any past or pending environmental litigation associated with the Property; any existing petroleum product or other hazardous substance storage tanks on the Property; or any fires or spills occurring on the Property.

Interviews and review of reasonably ascertainable information suggest that the northern portion of the Property was developed with residential buildings and detached garages since 1924 and has been used for residential purposes since then. Historical Sanborn maps show the southern portion of the Property developed as an office as early as 1930 and remained until at least 1938. Available information suggests the southern portion of the Property was occupied by a large store on the east (historical address of 7208 Chicago Avenue) and smaller store on the west side as early as 1951 and remained occupied by the two structures until at least 1962. Historical aerial photographs show the southern portion of the Property as redeveloped with a commercial building on the east side and the same small store on the west from as early as 1972 and remained until at least 1988. Documents provided by the Village of River Forest show several occupants for the commercial building (800 North Harlem Avenue) between 1970 and 2016 including: Original House of Pies (1970-1980); Life Savings & Loan (1981-1986); R.J. McGough Associates, Inc. (1982-1984); M&R Security (1984); Jenny Craig Weight Loss Centre (1985-1991); TCF Banking & Savings (1987-1991); TCF Bank (1993-2016). Ms. Skala indicated TCF Bank has occupied the building since the 1990s; however, documents provided by the Village of River Forest show TCF Banking & Savings, original name of TCF Bank, occupied the front portion of the building as early as 1987.

8.4 Opinions

Interviews and a review of reasonably ascertainable information revealed the following potential environmental conditions in connection with the Property. The following paragraphs provide a summary of the potential environmental conditions and our opinion whether the conditions are or are not currently RECs, CRECs, or HRECs.

Urban Fill: Based on previous experience in the Chicago metropolitan area, the shallow subsurface on the Property and other surrounding sites is generally characterized by urban fill comprised of soil mixed with cinders, brick fragments, and other debris to varying depths. Urban fill has the potential to contain elevated concentrations of metals and petroleum hydrocarbons. Given the commercial use of the Property, the presence of landscaped areas, pavement, and building foundations serving as an engineered barrier, and the existence of an ordinance prohibiting use of groundwater as a potable water source within the Village of River Forest, it is our opinion that this urban fill is unlikely to pose a significant risk to human health or the environment if it remains undisturbed in the subsurface on the Property. Therefore, the potential

for urban fill on the Property is not considered a REC, but rather, is considered a BER to those who may redevelop the Property in the future.

8.5 Conclusions

We have performed a Phase I Environmental Site Assessment of the Property in conformance with the scope and limitations of ASTM Practice E1527-13. Any exceptions to, or deletions from, this practice are described in Sections 1.4 and 8.2 of this report.

This assessment has revealed no evidence of RECs in connection with the Property. Accordingly, it is our opinion that further environmental assessment of the Property is not warranted at this time.

Although not considered RECs, the following conditions were identified which may be considered a BER:

- Housekeeping – During the site reconnaissance, outdoor material storage was noted at the residential property located at 818 N. Harlem Avenue. Noted materials included tires, ladders, batteries, rust preventative, and other material covered with tarps. While no significant environmental issues were identified, removal of this material may require management as a solid waste.
- Urban fill - The shallow subsurface on the Property and other surrounding sites may be generally characterized by urban fill comprised of soil mixed with cinders, brick fragments, and other debris to varying depths. Urban fill has the potential to contain elevated concentrations of metals and petroleum hydrocarbons. If disturbed, this material may need to be managed as a solid waste. Environmental sampling of subsurface soils would be necessary to confirm soil characteristics.

8.6 Environmental Professional Statement

As required by Section 12.13 of ASTM Standard 1527-13, the individual responsible for this Phase I ESA report provides the following declaration:

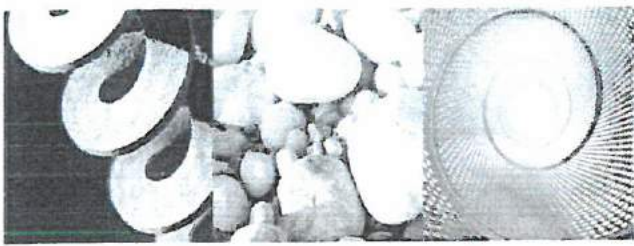
I declare that, to the best of my knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312. I have the specific qualifications based upon education, training, and experience to assess a property of the nature, history, and setting of the Property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Caitlin Krause
Staff Professional
(Contributing Staff)



Paul Killian, P.E.
Vice President/ Senior Project Engineer
(Environmental Professional)



Consulting
Engineers and
Scientists

Phase I Environmental Site Assessment

826 North Harlem Avenue
River Forest, Illinois 60305

Submitted to:
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July 13, 2018
Project 1802741

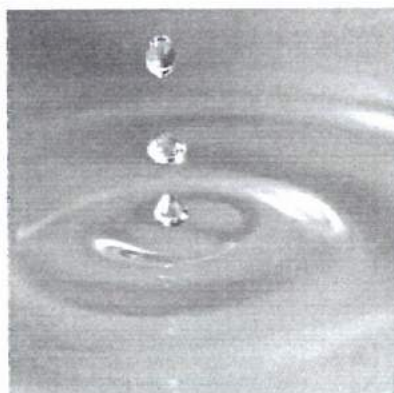


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- A. Photographic Log
- B. Resumes
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Executive Summary

GEI Consultants, Inc. (GEI), on behalf of Kaufman Jacobs (Client), has completed a Phase I Environmental Site Assessment (ESA) of the property located at 826 North Harlem Avenue in the Village of River Forest, Cook County, Illinois (Property). The Phase I ESA was completed in general accordance with GEI's proposal dated June 21, 2018, and the American Society for Testing and Materials (ASTM) Standard E 1527-13 titled, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM Standard). The purpose of this Phase I ESA was to identify, to the extent practicable, pursuant to processes prescribed in the ASTM Standard, recognized environmental conditions (RECs) in connection with the Property.

The Property is located at 826 North Harlem Avenue in the Village of River Forest, Cook County, Illinois. The Property consists of one parcel (Cook County Parcel No. 15-01-418-015) developed with an approximately 2,500 square-foot multi-story residential home constructed in approximately 1932 on a 9,200 square-foot parcel owned by Mr. Udo Wegner. The Property is in a mixed residential and commercial land use area, serviced by public potable water, public sanitary sewer, electrical, natural gas, and telecommunications services.

Mr. Udo Wegner was identified as the Property representative (i.e., key site manager) and interviewed as part of this Phase I ESA. Mr. Wegner was not aware of any prior uses of, or potential environmental concerns with the Property; any environmental liens or activity/use limitations associated with the Property; any past or pending environmental litigation associated with the Property; any existing petroleum product or other hazardous substance storage tanks on the Property; or any fires or spills occurring on the Property.

Interviews and review of reasonably ascertainable information suggest that the Property was developed with a residential building and detached garage since approximately 1932 and has been used for residential purposes since then.

We have performed a Phase I Environmental Site Assessment of the Property in conformance with the scope and limitations of ASTM Practice E1527-13. Any exceptions to, or deletions from, this practice are described in Sections 1.4 and 8.2 of this report.

This assessment has revealed no evidence of RECs in connection with the Property. Accordingly, it is our opinion that further environmental assessment of the Property is not warranted at this time.

Although not considered RECs, the following conditions were identified which may be considered a Business Environmental Risk (BER) a BER is defined by ASTM as "a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice."

- Urban fill - The shallow subsurface on the Property and other surrounding sites may be generally characterized by urban fill comprised of soil mixed with cinders, brick fragments, and other debris to varying depths. Urban fill has the potential to contain elevated concentrations of metals and petroleum hydrocarbons. If disturbed, this material may need to be managed as a solid waste. Environmental sampling of subsurface soils would be necessary to confirm soil characteristics.

1. Introduction

GEI Consultants, Inc. (GEI) has completed a Phase I Environmental Site Assessment (ESA), in general accordance with the American Society for Testing and Materials (ASTM) Standard E1527-13 titled, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (ASTM Standard), of the Property at 826 North Harlem Avenue in the Village of River Forest, Cook County, Illinois (Property). This Phase I ESA was conducted on behalf of Client to identify potential environmental liabilities associated with the Property.

1.1 Purpose

The purpose of this Phase I ESA was to identify, to the extent practicable pursuant to processes prescribed in the ASTM Standard, RECs in connection with the Property.

The ASTM Standard defines a REC as:

“The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to the release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions.”

An REC may be identified due to the known or suspected migration of hazardous substances or petroleum products as a solid or liquid at the surface or in the subsurface, and/or as vapor in the subsurface. An REC identified due to subsurface vapor migration would be based on the Environmental Professional’s interpretation of applicable elements of the Tier I procedure described in ASTM Standard E2600-10 titled, *Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions*.

The term REC includes hazardous substances or petroleum products even under conditions in compliance with laws. The term REC is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

The ASTM Standard defines a controlled REC (CREC) as:

“A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

The ASTM Standard defines a historical REC (HREC) as:

“A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).”

The ASTM Standard indicates that “this practice is intended to permit a user to satisfy one of the 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: that is, the practice that constitutes ‘all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice,’ as defined at 42 USC, §9601(35)(B).”

1.2 Scope of Work

The following tasks, prescribed in the ASTM Standard, were completed by GEI as part of this Phase I ESA:

- Records Review: Review of environmental, physical, and historical use record sources considered to be publicly available, practically reviewable, and obtainable within reasonable time and cost constraints (i.e., reasonably ascertainable).
- Property Reconnaissance: Observation of the exterior condition of the Property and nearby sites (if visually or physically observable during reconnaissance of the Property), and interior condition of structures on the Property, if present.
- Interviews: Interviews with current and previous owners, operators and occupants of the Property; local and/or state government officials; and owners, operators and occupants of nearby sites, where applicable.
- Report: Evaluation of information collected and preparation of a written report.

Unless otherwise specified in Section 5, this Phase I ESA does not include a discussion of the “non-scope considerations” identified in the ASTM Standard, including asbestos-containing building materials, lead-based paint, lead in drinking water, wetlands, mold, and radon. No sampling or testing of materials (e.g., soil, water, air, and building materials) was conducted as part of this Phase I ESA.

Photographic documentation of the Property reconnaissance is included in Appendix A. Resumes of GEI personnel involved with this Phase I ESA are included in Appendix B.

1.3 Significant Assumptions

GEI assumes that information provided by Client, or “user” of this report (as defined in the ASTM Standard), if different than Client, and all other individuals interviewed as part of this Phase I ESA is accurate and complete.

GEI assumes that maps, verbal descriptions, or other representations of the boundaries of the Property provided by Client, user, key site manager, and/or local government sources are accurate and complete. GEI did not seek to independently verify the boundaries of the Property as part of this Phase I ESA.

GEI assumes this report will be read as a whole by the user, and as such, does not advise the use of segregated sections of this report.

1.4 Limitations and Exceptions

This assessment was conducted in general accordance with good commercial, customary, and generally accepted practices for assessments of similar property conducted in this geographical location and at this time. Per the ASTM Standard, not every property will warrant the same level of assessment.

This assessment is not exhaustive and no environmental assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with the Property; rather, per the ASTM Standard, "Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property, and this practice recognizes reasonable limits of time and cost."

Opinions presented in this report are based on observations completed at the time of the reconnaissance and information that was reasonably ascertainable as of the issuance date of this report. Property conditions observed and information obtained at a later date and under other circumstances may be different than those observed and obtained during this assessment.

Environmental conditions and regulations are subject to change and re-interpretation, and as such, current observations, conditions, or regulatory positions may not represent conditions at some future time. No warranty, either expressed or implied with regard to the site conditions, or Client's ability to assert any defense under CERCLA or any comparable state law for environmental impairment, is contained herein.

Per the ASTM Standard, this assessment may be presumed to be valid if completed less than 180 days prior to the date of acquisition of the Property (i.e., the date on which a person acquires title to the Property) or, for transactions not involving an acquisition, the date of the intended transaction. This assessment may be presumed to be valid for a period of up to one year prior to the date of acquisition or intended transaction if certain components (e.g., interviews, review of government records, visual inspection of the Property, and others identified in Section 4.6 of the ASTM Standard) are conducted or updated within 180 days of the date of acquisition or the date of the intended transaction.

Additional information concerning limitations and data gaps is presented in Section 8 of this report. Deletions and deviations from the ASTM Standard, if any, including any Client-imposed constraints, are also identified in Section 8 of this report.

1.5 Special Terms and Conditions

The Phase I ESA was conducted in general accordance with GEI's proposal for service dated June 21, 2018.

1.6 User Reliance

This report was prepared for the exclusive use of Client for the purpose of evaluating potential environmental liabilities associated with the Property. Reliance on this report by anyone other than Client is done at the sole risk of the user.

2. Property Description

2.1 Location and Legal Description

The Property is located west of North Harlem Avenue and north of Chicago Avenue and consists of one parcel associated with address 826 North Harlem Avenue. Property information obtained from the City, County, and/or Client is included in Appendix C. The Property location is illustrated on a Property Location Map (based on a United States Geological Survey topographic map) and Property Features Diagram (based on an aerial photograph) presented as Figures 1 and 2, respectively.

2.2 Property and Vicinity General Characteristics

The Property can also be described as being in the central portion of Cook County, southeastern portion of the Village of River Forest, and in an area of mixed commercial and urban residential land use. Information obtained from the Cook County Assessor indicates the residential building located on the Property is primarily situated on an approximately 9,200 square-foot parcel (Cook County Parcel No. 15-01-418-015). The Property is developed with an approximately 2,500 square-foot multi-story residence and detached garage. The Property can be accessed from the west side of North Harlem Avenue.

Overall topography in the area appears to be relatively flat. The general drainage pattern appears to be from west to east toward a storm water inlet located on the northwest corner of North Harlem Avenue and Chicago Avenue.

2.3 Current Use of the Property

The Property is currently owned by Mr. Udo Wegner. Reasonably ascertainable information suggests the Property is currently used as a single-family residence and has been occupied for similar use since its construction in approximately 1932.

2.4 Property Improvements

The Property is currently improved with an approximately 2,500 square-foot multi-story residential building constructed with a basement foundation and a detached two-car garage. The Property is serviced by public potable water, public sanitary sewer, electrical, natural gas, and telecommunication services.

2.5 Current Uses of Adjoining Sites

GEI observed adjoining sites during the site reconnaissance to identify potential RECs concerning the Property. Adjoining sites were observed from the Property and public right-of-way (ROW) areas, and the occupants of the sites were not contacted as part of this Phase I ESA.

The Property is bound to the north by a residential building (830 North Harlem Avenue); to the east by North Harlem Avenue, with townhouses (813 to 825 North Harlem Avenue) located beyond; to the south by a residential building (822 North Harlem Avenue); and to the west by residential buildings (825 and 831 Bonnie Brae Place).

Visual observation of the adjoining sites, from the Property or public ROW areas, did not result in the identification of potential environmental conditions for the Property.

3. User Provided Information

The ASTM Standard describes Phase I ESA tasks to be performed by the “user” that may help identify the possibility of RECs in connection with the Property. The tasks to be completed by the user include a review of title and judicial records for the Property and communication to the environmental professional (i.e., GEI) of specialized knowledge or experience, actual knowledge of any environmental lien or activity and use limitations, reasons for a significantly lower purchase price versus fair market value, and commonly known or reasonably ascertainable information within the local community associated with the Property.

A questionnaire was presented to the user (i.e., Client) to assist with completion of the tasks above. A copy of the questionnaire is provided in Appendix D. A completed “User Questionnaire” was not returned; however, a discussion of information provided by the Client is presented below.

3.1 Title Records

Title and judicial records for the Property were not made available to GEI by the issuance date of this report, and as such, a review of such records for environmental liens or activity and use limitations was not completed as part of this Phase I ESA.

3.2 Environmental Liens or Activity and Use Limitations

Client representatives did not identify known or suspected environmental liens or activity and land use limitations associated with the Property.

3.3 Specialized Knowledge

Client representatives indicated that they do not have specialized knowledge or experience associated with the Property.

3.4 Commonly Known or Reasonably Ascertainable Information

Client representatives indicated that they are not aware of commonly known or reasonably ascertainable information associated with the Property other than that which might be presented in previous reports prepared for the Property and shared with GEI as part of this Phase I ESA.

3.5 Valuation Reduction for Environmental Issues

Client representatives did not indicate that the purchase price of the Property is significantly lower than the market value due to known or perceived environmental issues.

3.6 Owner, Property Manager, and Occupant Information

The Property is currently owned Mr. Udo Wegner who was identified as the Property representatives (i.e., key site managers) and interviewed as part of this Phase I ESA.

3.7 Reason for Performing Phase I ESA

This Phase I ESA was conducted on behalf of Client to identify potential environmental liabilities associated with the Property. Completion of a Phase I ESA in conformance with the ASTM Standard may satisfy one of the requirements for pursuit of an innocent landowner, contiguous property owner, or bona fide prospective purchaser defense to CERCLA liability.

3.8 Previous Reports and Other Information

Client indicated that they are not aware of any pending, threatened, or past litigation, proceedings, or notices of violation with respect to petroleum products or other hazardous substances associated with the Property (refer to Section 7).

4. Records Review

The purpose of the records review was to obtain and review environmental records that will help identify RECs in connection with the Property, and historical use records that will help develop a history of the previous uses of the Property and surrounding area, to help identify the likelihood of past uses having led to RECs in connection with the Property. Per the ASTM Standard, the user and environmental professional are not obligated to obtain and review every possible record that might exist with respect to the Property; rather, only records that are publicly available, practically reviewable, and obtainable within reasonable time and cost constraints (i.e., reasonably ascertainable) are required to be reviewed.

4.1 Standard Environmental Record Sources

Environmental Data Resources, Inc. (EDR), a subcontract environmental records search firm, reviewed current federal and state environmental databases for references to the Property and other hazardous waste and potentially impaired sites within specified minimum search distances from the Property. The EDR Radius Map Report, included in Appendix E, identifies the database sources and distances searched by EDR, and provides a summary of environmental record listings for the Property and surrounding sites. The databases reviewed by EDR those available as of May 4, 2018.

The Property addresses were not identified in any databases searched by EDR as part of this Phase I ESA.

The following is a summary of the number of other sites identified in databases within the respective minimum search distances from the Property:

- Superfund Enterprise Management System (SEMS) database – one site
- Federal RCRA-Small Quantity Generators (SQG) list – three sites
- Federal RCRA-Conditionally Exempt Small Quantity Generators List (CESQG) list – two sites
- Illinois Leaking Underground Storage Tank (LUST) list – 18 sites
- Illinois LUST TRUST list – one site
- Illinois Underground Storage Tank (UST) list – three sites
- Illinois Engineering Controls list – two sites
- Illinois Institutional Control list – three sites
- Illinois Site Remediation Program (SRP) list – five sites
- Drycleaners list – one site
- EDR Proprietary Historical Auto Stations list – three sites

- EDR Historical Cleaners list – three sites

Sites listed in the EDR report were reviewed for applicable search radii, regulation status, distance, topography, and gradient with respect to the Property. Regional groundwater flow direction is anticipated to be east toward Lake Michigan. Locally, groundwater flow direction is anticipated to be toward the Des Plaines River, which is approximately 1.5 miles west of the Property. Sites identified by EDR within applicable search distances considered hydraulically downgradient or sidegradient were generally considered unlikely to pose potential environmental conditions to the Property, unless they were identified as having a known release of petroleum products or hazardous substances (e.g., LUST, etc.), and the distance of the site from the Property or other factors were such that the release could be considered to have a reasonable potential to result in subsurface vapor migration onto the Property.

Database listings for immediately adjoining and upgradient sites considered to have a reasonable potential to pose potential environmental conditions to the Property are discussed below.

Adjoining Sites

Based on a review of the EDR report and other information obtained as part of this Phase I ESA (e.g., historical references, Property reconnaissance observations, etc.), the sites adjoining the Property were not listed in the EDR report.

Other Mapped Sites

Based on the nature of the environmental records, the inferred hydrological gradient and/or subsurface soils, distances from the Property, and/or status of the environmental records with the relevant regulatory authority, it is our opinion that database listings for other mapped sites are unlikely to pose potential environmental conditions to the Property.

Unmapped Properties

The EDR report did not identify any “orphan” database listings, which are environmental records associated with a site that have incomplete or erroneous address information.

4.2 Additional Environmental Record Sources

GEI attempted to review local records and/or additional state or tribal records to supplement standard environmental record sources reviewed in Section 4.1. Local records and/or additional state or tribal records were reviewed if they were considered reasonably ascertainable and sufficiently useful, accurate, and complete based on previous experience with the record sources. Local records and/or additional state or tribal records for surrounding sites were not reviewed, unless otherwise indicated, as they were considered not to be obtainable within reasonable time and cost constraints (i.e., not reasonably ascertainable).

4.2.1 Village of River Forest

GEI submitted a FOIA request to the Village of River Forest to obtain reasonably ascertainable records concerning the Property. Records were not available for the Property.

Copies of the FOIA request and response are included in Appendix F.

4.2.2 Village of River Forest Fire Department

GEI contacted the Village of River Forest Fire Department to obtain reasonably ascertainable information and records concerning the Property. The River Forest Fire Department records were provided by the Village of River Forest with the FOIA request (refer to Section 4.2.1). Fire Marshal Kevin Wiley provided information concerning spills, Fire Department responses, and Fire department inspections associated with the Property (refer to Section 7).

4.2.3 Office of the Illinois State Fire Marshal (OSFM)

GEI submitted a FOIA request to the OSFM and accessed the OSFM UST database to obtain information related to USTs which may have been registered for the Property. The Property was not identified in the OSFM database.

Copies of pertinent search results obtained from the OSFM are included in Appendix F.

4.2.4 Illinois Environmental Protection Agency

GEI accessed the IEPA online LUST database to obtain information related to LUST cases on the Property. The Property was not identified in the IEPA online LUST database.

Copies of pertinent records obtained from the IEPA are included in Appendix F.

4.3 Physical Setting Sources

Published physical setting sources were reviewed to obtain topographic, soil, and groundwater depth and flow direction information for the Property and vicinity, in order to further assess the potential for petroleum products or other hazardous substances to migrate to, from, or within the Property.

The Illinois State Geological Survey publication, *Geologic Atlas of Cook County for Planning Purposes, 2011*, indicates that the Property is in an area of Cook County situated on the eastern flank of the southward-plunging Wisconsin Arch. Silurian age bedrock thickens eastward into the Michigan Basin, and the underlying Cambrian and Ordovician strata thicken southward into the Illinois Basin. Bedrock in the vicinity of the Property is covered by up to 300 feet of unlithified surficial materials consisting of clay, silt, and sand and gravel deposited primarily by glacial processes. It is reported that Silurian age dolomite is the uppermost bedrock in the vicinity of the Property.

The U.S. Department of Agriculture, Natural Resource Conservation Service (NRCS) Web Soil Survey indicates that the primary soil series mapped at the Property location is Urban land and Alfic Udarents, clayey-urban land – Elliott complex. The Alfic Udarents, clayey-urban land – Elliott complex has a depth to restrictive feature of 48 to 66 inches, is moderately well drained and is found at the summit of ground moraines and lake plains.

Regional groundwater flow direction is anticipated to be east toward Lake Michigan. Locally, groundwater flow direction is anticipated to be toward the Des Plaines River, which is located approximately 1.5 miles west of the Property. However, existing ditches, underground utilities, and other natural and manmade features may influence local groundwater flow direction. Determination of existing groundwater conditions at the Property, including depth and flow direction, would require installation and assessment of groundwater monitoring wells.

A 7.5-minute topographic map of River Forest, Cook County, Illinois, quadrangle (dated 2018) shows the area topography and surface water features in and around the Property. The topographic map shows the Property as being in an urban area of relatively low relief with approximate elevation ranging between +620 and +630 feet above MSL. Overall topography in the area is shown to slope generally to the west toward the Des Plaines River. Buildings and other structures of note are not illustrated on the Property or on adjacent sites.

4.4 Historical Use Information

The objective of consulting historical sources was to develop a history of the previous uses of the Property and surrounding area, to help identify the likelihood of past uses having led to RECs in connection with the Property.

4.4.1 Sanborn Fire Insurance Maps

GEI requested reasonably ascertainable Sanborn Fire Insurance (Sanborn) maps from EDR. The EDR Certified Sanborn Map Report, included in Appendix G, indicates that Sanborn maps dated 1895, 1908, 1930, 1947, 1950, 1951, and 1975 are available for the Property location.

The Sanborn maps dated 1895 and 1908 do not include the Property, but show structures located east of North Harlem Avenue. The maps show the east adjoining sites as being occupied by two contiguous dwellings.

The Sanborn map dated 1930 shows the Property as occupied by a dwelling with detached garage and smaller building located in the southwest corner of the Property. Adjoining sites to the north, west, and south are shown developed with dwellings and detached garages.

The Sanborn maps dated 1947 and 1950 do not include the Property, but show structures east of North Harlem Avenue. The adjoining site to the east is shown occupied by two dwellings with a garage located between the dwellings.

The 1951 and 1975 Sanborn maps show the structures west of North Harlem Avenue including the Property. The Property and adjoining sites are shown similar to the 1930 Sanborn map.

4.4.2 Aerial Photographs

GEI reviewed reasonably ascertainable historical aerial photographs dated 1938, 1951, 1962, 1972, 1978, 1983, 1988, 1994, 1999, 2005, 2009, and 2012 obtained from EDR and included in Appendix G. A description of pertinent observations for the property and surrounding area, based on available photographs, is provided below.

Historical aerial photograph dated 1938 appears to show the Property as occupied by a residential building and detached garage. The surrounding sites are generally occupied by residential buildings.

Historical aerial photographs dated 1951 and 1962 generally show the Property as occupied by two residential buildings on the northern portion and a parking lot and building on the southern portion. Adjoining sites appear to be occupied by residential and commercial buildings.

Historical aerial photographs dated 1972 and 1978 generally show the Property and surrounding sites as occupied similar to the 1962 photograph except; the building on the southern portion of the Property appears to be smaller.

Historical aerial photographs dated 1983 and 1988 generally show the Property and surrounding sites as occupied similar to the 1978 photograph except the building on the southern portion of the Property appears to have an addition on the northwestern corner of the building.

The 1994, 1999, 2005, 2009, and 2012 aerial photographs generally show the Property as being redeveloped with the existing building. Surrounding sites appear similar to the 1988 aerial photograph.

4.4.3 Topographic Maps

GEI reviewed reasonably ascertainable historical topographic maps provided by EDR. EDR provided topographic maps dated 1891, 1893, 1900, 1901, 1928, 1953, 1963, 1972, 1978, 1980, 1993, 1997, 1998 and 2012. Copies of historic topographic maps obtained from EDR are included in Appendix G. Pertinent historical use information obtained from a review of the topographic maps is provided below.

The topographic maps dated 1891, 1893, 1900, and 1901 (Riverside Quad, 15-minutes series) illustrate the alignment of the streets near the Property and development of River Forest, Oak Park, and Ridgeland areas.

The topographic map dated 1928 (River Forest, 7.5-minute series) illustrates the alignment of the streets near the Property and appears to show a residential building on the Property. The topographic map also illustrates contiguous residential buildings north, south, and west of the Property, and a single residential building is shown east of the Property.

The topographic maps dated 1953, 1963, 1972, 1978, 1980, 1993, 1997, and 1998 (River Forest, 7.5-minute series) illustrate the alignment of the streets near the Property, but no longer illustrate buildings on the property or surrounding sites.

The 7.5-minute series topographic map dated 2012 for the Chicago Loop Quad illustrates the alignment of the streets near the Property. This map does not show buildings on the Property or nearby sites (other than schools and landmark buildings); rather, the Property and nearby sites are illustrated as being in an urban area.

4.4.4 City Directories

GEI reviewed reasonably ascertainable city directory information provided by EDR dated 1970, 1977, 1982, 1988, 1993, 2000, 2004, and 2009. A copy of the EDR City Directory Abstract is included in Appendix G. Pertinent information provided by the abstract includes:

Directory Year	Property Listing	Adjoining Site Listings
1970	Not listed in directories	822 North Harlem Ave: R T Anderson (south adjoining) 838 North Harlem Ave: Nester C. Kohut (north)
1977	826 North Harlem Ave: E. Roughley	822 North Harlem Ave: R. A Wehrenberg (south adjoining) 830 North Harlem Ave: Bruce Bullock (north adjoining)
1982	826 North Harlem Ave: E. Roughley	822 North Harlem Ave: H. Keller Jr (south adjoining) 830 North Harlem Ave: Bruce Bullock (north adjoining)
1988	826 North Harlem Ave: XXXX	822 North Harlem Ave: XXXX (south adjoining) 830 North Harlem Ave: Bruce and Sandy Bullock (north adjoining)
1993	826 North Harlem Ave: XXXX	822 North Harlem Ave: XXXX (south adjoining) 830 North Harlem Ave: Bruce and Sandy Bullock (north adjoining)
2000	826 North Harlem Ave: XXXX	822 North Harlem Ave: XXXX (south adjoining) 830 North Harlem Ave: Bruce, Kelly, Leslie, and Sandy Bullock (north adjoining)
2004	826 North Harlem Ave: Maruicio Segovia	822 North Harlem Ave: Brian Sharpe (south adjoining) 830 North Harlem Ave: Bruce and Sandy Bullock (north adjoining)
2009	826 North Harlem Ave: T. Canales	830 North Harlem Ave: Robert D Greendyke (north adjoining)

5. Supplemental Information

A Phase I ESA can include a review and/or assessment of “non-scope considerations” identified in the ASTM Standard, including asbestos-containing building materials, lead-based paint, lead in drinking water, wetlands, mold, radon, and others.

Client did not request this Phase I ESA to include a review and/or assessment of any “non-scope considerations” identified in the ASTM Standard.

6. Property and Adjoining Site Reconnaissance

The site reconnaissance was completed by Ms. Ati Fathi, Staff Professional, of GEI, on July 10, 2018. Weather conditions at the time of the site reconnaissance were fair with ambient temperatures between approximately 80 and 85 degrees Fahrenheit.

6.1 Methodology and Limiting Conditions

GEI observed the Property; surrounding sites, if visually or physically observable during reconnaissance of the Property; and interior and exterior of structures on the Property, if present, to obtain information concerning potential RECs in connection with the Property. Limiting conditions have the potential to be significant, depending on previous experience with similar property settings and uses, and other reasonably ascertainable information. A discussion of limiting conditions and data gaps encountered during this Phase I ESA is presented in Section 8 of this report.

6.2 General Setting

The Property can be described as being in the central portion of the County, southeast portion of the Village, and in an area of mixed commercial and urban residential land use. Information obtained from the Cook County Assessor indicates the residence located on the Property is primarily situated on a single parcel (Cook County Parcel No. 15-01-418-015) measuring 9,200 square-feet. The Property is developed with an approximately 2,500 square-foot multi-story residence and detached garage. The Property can be accessed by a single entrance on the east side of North Harlem Avenue.

Overall topography in the area appears to be relatively flat. The general drainage pattern for the Property appears to be from west to east and toward a storm water inlet located on the northwest corner of North Harlem Avenue and Chicago Avenue.

6.3 Observations

6.3.1 Exterior Observations for the Property

The residence at 826 North Harlem Avenue was generally observed to be in good condition. A concrete-paved driveway, accessible to the residence, was observed along the south portion of the Property and was in generally fair condition with minimal cracking observed. A two-car, detached garage was observed in the southwest corner of the Property. An approximately 6-foot tall wooden fence bordered the north, south, and west boundaries of the Property. An air conditioning unit was observed near the northwest corner of the residence.

Observations of the Property exterior did not reveal above ground storage tanks (ASTs) or vent pipes, fill pipes, access ways, or other structures typically associated with USTs; drums or other containers of petroleum products or other hazardous substances; unidentified substance containers;

electrical or hydraulic equipment known or suspected to contain PCBs; pits, ponds, or lagoons; wells, septic systems, or structures typically associated with private sewerage and potable water supply systems; wastewater or other liquid discharges into a drain, ditch, or other waterway; standing surface water or pools or sumps potentially containing petroleum products or other hazardous substances; indications of potential fill placement or improper solid waste disposal; strong, pungent, or noxious odors; stressed vegetation; or surface staining.

6.3.2 Exterior Observations for Surrounding Sites

GEI observed adjoining sites during the reconnaissance to identify potential RECs concerning the Property. Adjoining sites were observed from the Property or public ROW areas, and the occupants of the sites were not contacted as part of this Phase I ESA.

The Property is bound to the north by a residential building (830 North Harlem Avenue); to the east by North Harlem Avenue, with townhouses (813 to 825 North Harlem Avenue) located beyond; to the south by a residential building (822 North Harlem Avenue); and to the west by residential buildings (825 and 831 Bonnie Brae Place).

Visual observation of the adjoining sites did not reveal readily apparent ASTs, USTs, unidentified substance containers, ground surface staining, or other evidence suggesting the potential for environmental impairment except for the current use of two southern adjoining sites as service stations.

6.3.3 Interior Observations for Structures on the Property

The interior of 826 North Harlem Avenue residence includes a living area, dining area, kitchen, bathrooms, and bedrooms. The basement was observed in good condition and generally consisted of a furnace, water heater, utility sink, and connections for a washer and dryer. The wood-framed, concrete slab, detached garage located in the southwest corner of the parcel, was observed in good condition and generally consisted of personal storage and woodworking materials. Except for household cleaning supplies and woodworking supplies (e.g. paint and wood finish products), observation of the interior of the residence and garage did not reveal petroleum product or other hazardous substance storage, unidentified substance storage, staining, unusual odors, or other evidence of potential environmental impairment.

7. Interviews

Interviews were completed by Ms. Caitlin Krause (Staff Professional) of GEI. Individuals interviewed and information obtained is presented below and/or discussed in preceding sections of this report.

GEI asked Mr. Lee Winters and the key site manager whether they were aware if any of the documents listed in Section 10.8.1 of the ASTM Standard (e.g., prior Phase I ESA reports, environmental compliance audit reports, environmental permits, AST and UST registrations, etc.) exist for the Property, and if so, whether copies of the documents could be provided to GEI for review as part of this Phase I ESA. Individuals interviewed as part of this Phase I ESA indicated that they are aware of prior documents, as discussed previously in Section 3.8.

Prior to the site reconnaissance, GEI also asked Mr. Winters and the key site manager whether they were aware of: any pending, threatened, or past litigation relevant to hazardous substances or petroleum products in, on, or from the Property; any pending, threatened, or past administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Property; and any notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products. Individuals interviewed as part of this Phase I ESA indicated that they are not aware of any such litigation, proceedings, or notices.

7.1 Key Site Manager

Mr. Udo Wegner was identified as the Property representatives (i.e., key site managers) and interviewed as part of this Phase I ESA.

Mr. Wegner was not aware of any prior uses of, or potential environmental concerns with the Property; any environmental liens or activity/use limitations associated with the Property; any past or pending environmental litigation associated with the Property; any existing petroleum product or other hazardous substance storage tanks on the Property; or any fires or spills occurring on the Property.

7.2 Occupants

See Section 7.1 above.

7.3 Past Owners, Operators, and Occupants

Contact information for past owners, operators, and occupants was not reasonably ascertainable, and as such, interviews with those individuals were not conducted as part of this Phase I ESA.

7.4 State and/or Local Government Officials

GEI interviewed Mr. Kevin Wiley, Fire Marshal for the Village of River Forest, to obtain reasonably ascertainable information for the Property. According to Mr. Wiley, he is not aware of any current or former storage tanks on the Property and is not aware of any former or outstanding fire code violations relating to petroleum product or hazardous substance storage on the Property. Mr. Wiley also indicated that he is not aware of any responses to the Property for spills or fires.

8. Evaluation

8.1 Data Gaps

A data gap is defined as the lack of or inability to obtain information required by the ASTM Standard despite good faith efforts to gather such information. A data gap by itself is not inherently significant. Data failure is one type of data gap, and is defined as a failure to achieve the historical research objectives in Sections 8.3.1 through 8.3.2.2 of the ASTM Standard, even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Data gaps and data failure (if any) encountered during performance of this Phase I ESA, as well as a discussion of their significance, is presented below.

- Title and judicial records for the Property were not made available to GEI by the issuance date of this report, and as such, a review of such records for environmental liens or activity and use limitations was not completed as part of this Phase I ESA.
- GEI was unable to fully assess the use of the Property prior to 1930.

The ASTM Standard defines an environmental lien as “A charge, security, or encumbrance upon title to a property to secure the payment of a cost, damage, debt, obligation, or duty arising out of response actions, cleanup, or other remediation of hazardous substances or petroleum products upon a property, including liens imposed pursuant to CERCLA 42 U.S.C. §§9607(1) & 9607(r) and similar state and local laws.” The ASTM Standard defines activity and use limitations as “legal or physical restrictions or limitations on the use of, or access to, a site or facility: (1) to reduce or eliminate potential exposure to hazardous substances or petroleum products..., or (2) to prevent activities that could interfere with the effectiveness of a response action...” Other reasonably ascertainable information, including the EDR report, does not suggest that state- or federal-funded petroleum product or other hazardous substance response actions, cleanup, or remediation activities have occurred on the Property. Therefore, it is considered unlikely that environmental liens exist with respect to the Property. Based on the information above, the inability to review the results of a title and judicial records search for the Property is not considered a significant data gap.

The inability to fully assess the use of the Property prior to 1930 is not considered a significant data gap given that the Property appears to have been developed for residential use since 1930, and based on the Property location, was likely undeveloped or developed for similar use prior to that time. It is considered unlikely that additional information concerning historical uses of the Property prior to 1930, if available at some future time, would result in the identification of a REC.

8.2 Deviations

Deletions and deviations from the ASTM Standard practice, including Client/user-imposed constraints, and any additions (e.g., non-scope considerations) to the practice, are required to be listed individually and in detail as part of this report.

GEI is not aware of any deletions or deviations from, or any additions to, the ASTM Standard that were completed as part of this Phase I ESA, except for the supplemental information provided in Section 5 of this report.

8.3 Findings

The Property is located at 826 North Harlem Avenue in the Village of River Forest, Cook County, Illinois. The Property consists of one parcel (Cook County Parcel No. 15-01-418-015) developed with an approximately 2,500 square-foot multi-story residential home constructed in approximately 1932 on a 9,200 square-foot parcel owned by Mr. Udo Wegner. The Property is in a mixed residential and commercial land use area, serviced by public potable water, public sanitary sewer, electrical, natural gas, and telecommunications services.

This assessment has revealed no evidence of RECs in connection with the Property. Accordingly, it is our opinion that further environmental assessment of the Property is not warranted at this time.

8.4 Opinions

Interviews and a review of reasonably ascertainable information revealed the following potential environmental conditions in connection with the Property. The following paragraphs provide a summary of the potential environmental conditions and our opinion whether the conditions are or are not currently RECs, CRECs, or HRECs.

Urban Fill: Based on previous experience in the Chicago metropolitan area, the shallow subsurface on the Property and other surrounding sites is generally characterized by urban fill comprised of soil mixed with cinders, brick fragments, and other debris to varying depths. Urban fill has the potential to contain elevated concentrations of metals and petroleum hydrocarbons. Given the commercial use of the Property, the presence of landscaped areas, pavement, and building foundations serving as an engineered barrier, and the existence of an ordinance prohibiting use of groundwater as a potable water source within the Village of River Forest, it is our opinion that this urban fill is unlikely to pose a significant risk to human health or the environment if it remains undisturbed in the subsurface on the Property. Therefore, the potential for urban fill on the Property is not considered a REC, but rather, is considered a BER to those who may redevelop the Property in the future.

8.5 Conclusions

We have performed a Phase I Environmental Site Assessment of the Property in conformance with the scope and limitations of ASTM Practice E1527-13. Any exceptions to, or deletions from, this practice are described in Sections 1.4 and 8.2 of this report.

This assessment has revealed no evidence of RECs in connection with the Property. Accordingly, it is our opinion that further environmental assessment of the Property is not warranted at this time.

Although not considered RECs, the following conditions were identified which may be considered a BER:

- Urban fill - The shallow subsurface on the Property and other surrounding sites may be generally characterized by urban fill comprised of soil mixed with cinders, brick fragments, and other debris to varying depths. Urban fill has the potential to contain elevated concentrations of metals and petroleum hydrocarbons. If disturbed, this material may need to be managed as a solid waste. Environmental sampling of subsurface soils would be necessary to confirm soil characteristics.

8.6 Environmental Professional Statement

As required by Section 12.13 of ASTM Standard 1527-13, the individual responsible for this Phase I ESA report provides the following declaration:

I declare that, to the best of my knowledge and belief, I meet the definition of Environmental Professional as defined in Section 312.10 of 40 CFR 312. I have the specific qualifications based upon education, training, and experience to assess a property of the nature, history, and setting of the Property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Caitlin Krause
Staff Professional
(Contributing Staff)



Paul Killian, P.E.
Vice President/ Senior Project Engineer
(Environmental Professional)