

PHASE I ENVIRONMENTAL SITE ASSESSMENT

± 73-ACRE HIGHWAY 321 RAIL SITE

LEXINGTON COUNTY, SOUTH CAROLINA

COUNTY OF LEXINGTON



PHASE I ENVIRONMENTAL SITE ASSESSMENT

± 73-ACRE HIGHWAY 321 RAIL SITE

LEXINGTON COUNTY, SOUTH CAROLINA

COUNTY OF LEXINGTON

Prepared For:



County of Lexington
212 South Lake Drive, Suite 502
Lexington, South Carolina 29072



Prepared By:
Alliance Consulting Engineers, Inc.
Post Office Box 8147
Columbia, South Carolina 29202

Project No. 25168-0032

July 29, 2025





TABLE OF CONTENTS

1.0	SUMMARY	1
2.0	INTRODUCTION	2
2.1	PURPOSE	2
2.2	DETAILED SCOPE OF SERVICES	3
2.3	SIGNIFICANT ASSUMPTIONS	4
2.4	LIMITATIONS AND EXCEPTIONS	4
2.5	SPECIAL TERMS AND CONDITIONS	5
3.0	SITE DESCRIPTION	6
3.1	LOCATION AND LEGAL DESCRIPTION	6
3.2	SITE AND VICINITY GENERAL CHARACTERISTICS	14
3.3	CURRENT SITE USE	14
3.4	PAST SITE USE AND OWNERSHIP	14
3.5	ADJOINING PROPERTY USES	15
3.6	DRAINAGE	16
4.0	REGULATORY RECORDS REVIEW	18
5.0	SITE RECONNAISSANCE	21
5.1	METHODOLOGY AND LIMITING CONDITIONS	21
5.2	EXTERIOR OBSERVATIONS	21
5.3	INTERIOR OBSERVATIONS	22
6.0	INTERVIEWS	23
7.0	FINDINGS AND OPINIONS	24
8.0	CONCLUSIONS	28
9.0	DEVIATIONS	29
10.0	REFERENCES	30
11.0	SIGNATURES OF ENVIRONMENTAL PROFESSIONALS	31
12.0	STATEMENT OF QUALIFICATIONS	32



LIST OF EXHIBITS

EXHIBIT A	VICINITY MAP	7
EXHIBIT B	SITE LOCATION MAP	8
EXHIBIT C	AERIAL MAP	9
EXHIBIT D	TOPOGRAPHIC MAP	10
EXHIBIT E	SOILS MAP	11
EXHIBIT F	FEMA FLOOD PLAIN MAP	12
EXHIBIT G	NATIONAL WETLANDS INVENTORY (NWI) MAP	13

LIST OF TABLES

TABLE 1 - ADJOINING PROPERTY OWNERS	16
TABLE 2 - SITES WITHIN APPROXIMATE MINIMUM SEARCH DISTANCE	18
TABLE 3 - OBSERVED EXTERIOR CONDITIONS OR ITEMS	21

LIST OF APPENDICES

APPENDIX A – PHOTOGRAPHS
APPENDIX B – ENVIRONMENTAL DATA REPORTS
APPENDIX C – INTERVIEW DOCUMENTATION
APPENDIX D – SENIOR ENVIRONMENTAL PROFESSIONAL’S RESUME



1.0 SUMMARY

This *report* is prepared for use by the County of Lexington and presents the findings of a *Phase I Environmental Site Assessment* of the approximately seventy-three (73)-Acre Highway 321 Rail Site located along US Highway 321 in the Town of Gaston in Lexington County, South Carolina. The *subject property* is identified as Lexington County Tax Map Numbers 010100-02-004 (67.85-Acres) and 010100-02-027 (5.38-Acres). The *subject property* is currently owned by Dempsey & Lanier Holding Company, LLC and will be further detailed in Section 3.4 – Past Site Use and Ownership. The County of Lexington requested and authorized that Alliance Consulting Engineers, Inc. conduct a *Phase I Environmental Site Assessment* to satisfy the *Landowner Liability Protections* in as part of the *Due Diligence* for their purchase of the *subject property*.

Alliance Consulting Engineers, Inc. conducted a *site reconnaissance* on September 3, 2025, to determine if the *subject property* is subject to *recognized environmental conditions*. Tasks conducted during the *site reconnaissance* included observation of the general hydraulic and hydrogeologic conditions of the *subject property* and surrounding areas, a vehicular tour of the vicinity to observe sites identified during the *records review*, and a pedestrian reconnaissance to assist in determining the history of the *subject property*. No items observed during the *site reconnaissance* were identified as *recognized environmental conditions* with regard to the *subject property*.

Six (6) sites/facilities were identified within the approximate minimum search distance in the vicinity of the *subject property* as a result of the *records review*. Based on regulatory records and interviews with key government officials, the sites/facilities identified during the *records review* are not considered *recognized environmental conditions* with regard to the *subject property*. The results of the *records review* will be further detailed in Section 7.0 – Findings and Opinions.



2.0 INTRODUCTION

2.1 Purpose

The purpose of this *Phase I Environmental Site Assessment (ESA)* is to determine if the approximately seventy-three (73)-Acre Highway 321 Rail Site is subject to *recognized environmental conditions (RECs)*. The *Phase I ESA* has been performed in general conformance with the provisions set forth in the *American Society for Testing and Materials (ASTM) E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. Per the approval of the United States Environmental Protection Agency (US EPA), which went into effect on February 13, 2023, an assessment performed in accordance with this standard meets requirements for *All Appropriate Inquiry (AAI)* as per 40 CFR Part 312 and may permit the *user* to qualify for certain *Landowner Liability Protections (LLPs)*. This *Phase I ESA* has been conducted to satisfy the requirements of *AAI* rule as detailed in 40 CFR Part 312.20E. ASTM defines the term, *recognized environmental conditions*, as the presence or *likely* presence of any *hazardous substances* or *petroleum products* in, on, or at a *property* due to a *release* or *likely releases* to the *environment*; under conditions indicative of a *release* to the *environment*; or under conditions that pose a *material threat* of a future *release* to the *environment*. Under this definition *likely* is defined as a condition which is neither certain nor proved, but can be expected or believed by a reasonable observer based on the logic and/or experience or the environmental professional, and/or available evidence, as stated in this report to support the opinions given; and *environment* is defined as the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act; and any other surface water, groundwater, drinking water supply, land surface or sub-surface strata, or ambient air within the United States or under the jurisdiction of the United States. *De minimis conditions* are not *RECs*.





2.2 Detailed Scope of Services

The scope of this assessment was restricted to the environmental conditions as outlined in *ASTM E 1527-21 Standard Practice*. The findings, opinions, and conclusions presented in this report are based on information obtained during the *environmental site assessment*, as well as from Alliance Consulting Engineers, Inc.'s prior experience. If additional information that might impact these environmental conclusions becomes available, it is requested that Alliance Consulting Engineers, Inc. be granted the opportunity to review the information and reassess any potential concerns. This assessment does not constitute an *environmental compliance audit* and does not include an assessment of environmental conditions associated with cultural and historical risks, protected and endangered species, vapor intrusion, or controlled substances. In order to accomplish the stated objectives, the following engineering services were performed:

- A. A *site reconnaissance* to the *property* to *visually and/or physically observe* the site conditions relative to environmental concerns;
- B. A pedestrian and vehicular reconnaissance of the *subject property* and surrounding areas to determine if *obvious* adjacent land use might suggest potential environmental concerns;
- C. A query of *reasonably ascertainable* environmental records available from the South Carolina Department of Environmental Services (SCDES) and the US EPA;
- D. A review of select available documents to aid in assessing the historical and current uses of the *subject property* and *adjoining properties*;
- E. A brief, qualitative hydraulic evaluation of the *subject property* and vicinity to characterize the area drainage patterns; and
- F. Interviews with the *Key Site Manager*, a person identified by the *owner* or *operator* of the *subject property* with good knowledge of the uses and physical characteristics of the *subject property*, a representative of the prospective *user*, and local government officials.

This *Phase I ESA* and its findings are limited to the *subject property*. No investigations or assessments of *adjoining properties*, beyond historical property use examinations, were included within the scope of this *Phase I ESA*.



2.3 Significant Assumptions

The following are assumptions of this *Phase I ESA*:

- Data obtained from the public records is accurate and current;
- Groundwater flows follow the general topography of the land surface; and
- Information gathered from interviews was given in *good faith* and is based on *actual knowledge*.

2.4 Limitations and Exceptions

The practice of completing a *Phase I ESA* is intended to permit a *user* to satisfy one (1) of the requirements to qualify for the *Landowner Liability Protections (LLPs)* that constitutes *all appropriate inquiry* into the previous ownership and uses of the *property* consistent with good commercial or customary practice. As such, *ASTM E 1527-21* seeks to reduce, but not eliminate, uncertainty regarding *recognized environmental conditions* in connection with the *subject property*. Further, *all appropriate inquiry* does not imply an exhaustive assessment of real property, but instead calls for the *environmental professional* to identify a balance between competing demands of limited cost and time and the reduction of uncertainty about unknown conditions.

The findings, opinions, and conclusions presented in this report are based on *reasonably ascertainable* information and are representative of the conditions of the *property* at the time of the evaluation. It is important to note the ability to complete the services involved with the review of public records and maps as well as the ability to conduct interviews with appropriate individuals is highly dependent upon the time frame of the project schedule. In some instances, further review of information and/or additional interviews of other individuals cannot be obtained within the required timeline for completion.



2.5 Special Terms and Conditions

This *report* is prepared for use by the County of Lexington and presents the findings of a *Phase I ESA* of the approximately seventy-three (73)-Acre Highway 321 Rail Site. Any use, reuse, or adaptation of this *environmental site assessment* by other parties will be at such parties' sole risk and without liability or legal exposure to Alliance Consulting Engineers, Inc. Furthermore, other parties shall, to the fullest extent permitted by law, indemnify and hold harmless Alliance Consulting Engineers, Inc. from all claims, damages, losses, and expenses, including attorney's fees resulting from the misuse of or alterations to the data contained within the *environmental site assessment*.



3.0 SITE DESCRIPTION

A Vicinity Map, Site Location Map, Aerial Map, Topographic Map, Soils Map, Federal Emergency Management Agency (FEMA) Flood Map, and National Wetlands Inventory (NWI) Map were prepared by Alliance Consulting Engineers, Inc. dated June 10, 2025, depicting the *subject property* and are presented as Exhibits A through G, respectively. The Site Location Map is derived from the South Carolina Department of Transportation's (SCDOT) Highway Map of Lexington County dated 2023. The Aerial Map is derived from the United States Department of Agriculture Natural Resources Conservation Service's (USDA-NRCS) Geospatial Gateway Data dated 2024 for Lexington County. The Topographic Map is derived from the United States Geological Survey's (USGS) Quadrangle Map for Gaston dated 2024. The Soils Map is derived from the USDA-NRCS Soil Datamart dated 2019. The FEMA Flood Plain Map is derived from the FEMA Flood Map Catalog; Panel No. 45063C0288J, 45063C0401J, and 45063C0405J dated July 5, 2018. The NWI Map is obtained from the United States Fish and Wildlife Service Online Mapper.

3.1 Location and Legal Description

The approximately seventy-three (73)-Acre Highway 321 Rail Site is located along US Highway 321 in the Town of Gaston in Lexington County, South Carolina. The *subject property* is identified as Lexington County Tax Map Numbers 010100-02-004 (67.85-Acres) and 010100-02-027 (5.38-Acres) and is currently owned by Dempsey & Lanier Holding Company, LLC.

HIGHWAY 321 RAIL SITE LEXINGTON COUNTY, SOUTH CAROLINA VICINITY MAP

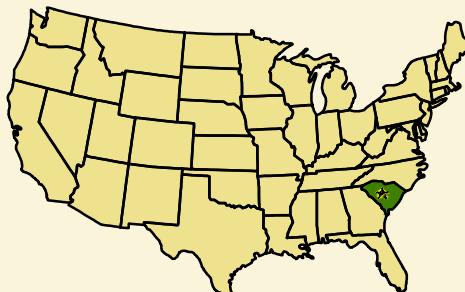
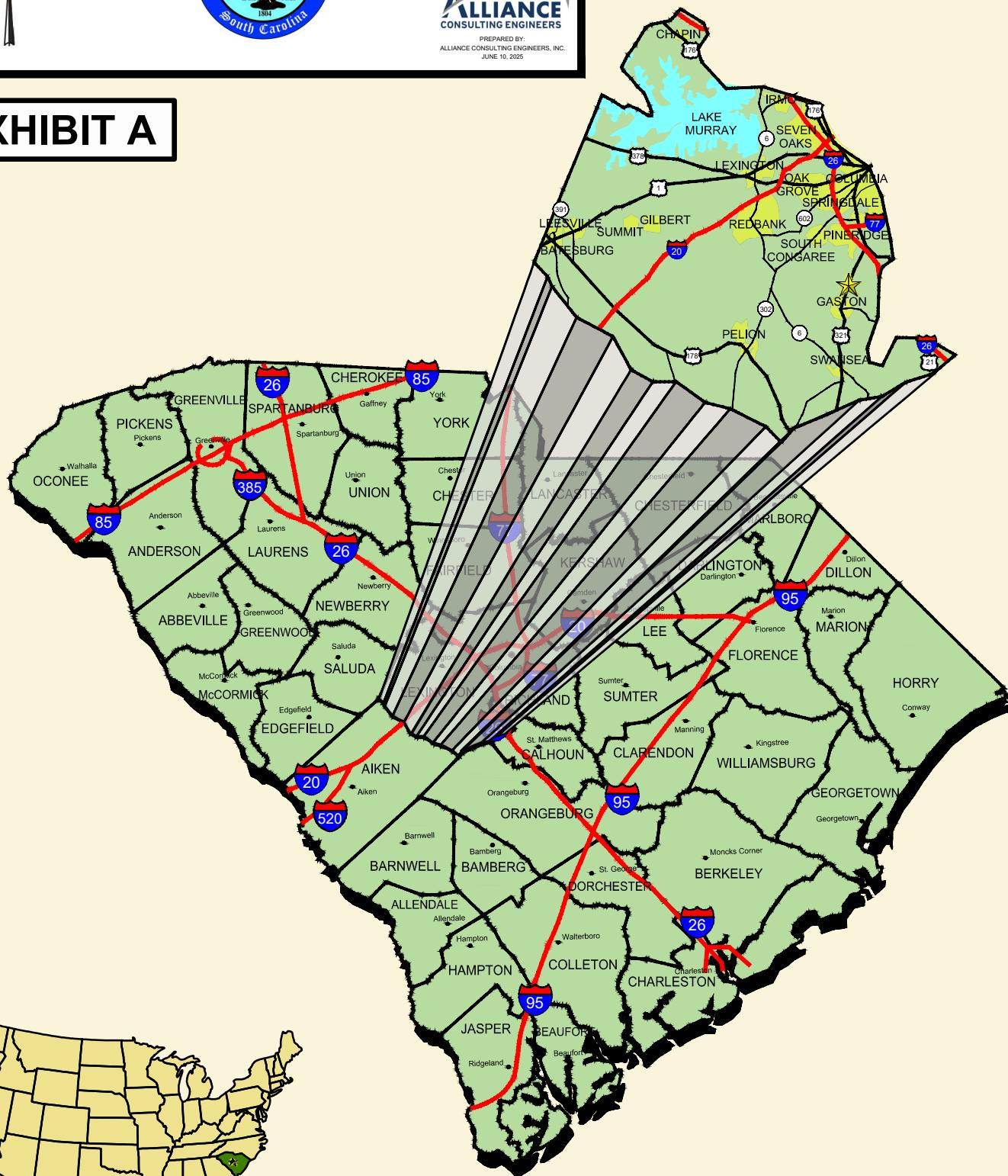


± 73 Acres



PREPARED BY:
ALLIANCE CONSULTING ENGINEERS, INC.
JUNE 10, 2025

EXHIBIT A



**HIGHWAY 321 RAIL SITE
LEXINGTON COUNTY, SOUTH CAROLINA
SITE LOCATION MAP**

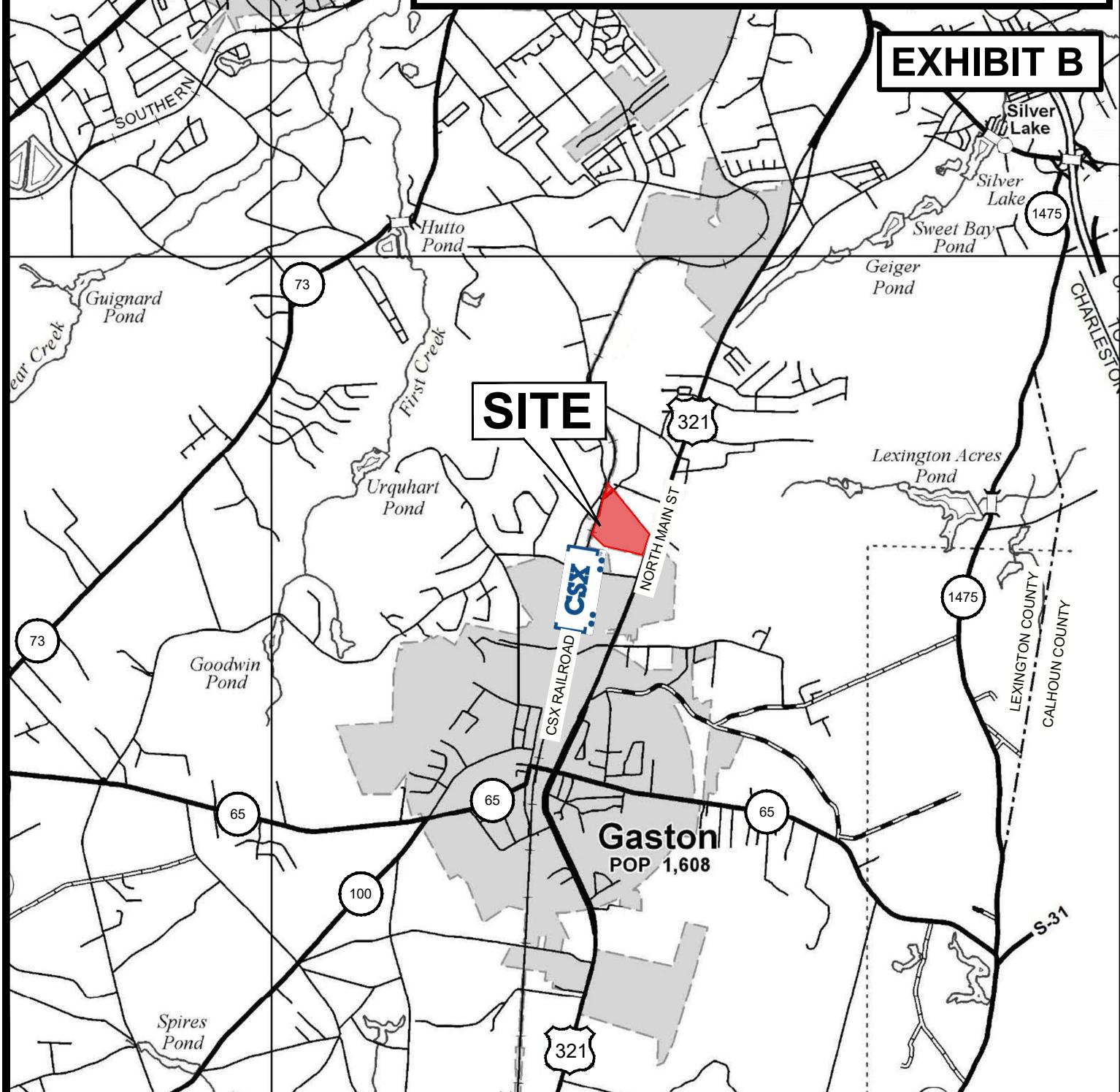


± 73 Acres



ALLIANCE
CONSULTING ENGINEERS
PREPARED BY:
ALLIANCE CONSULTING ENGINEERS, INC.
INFORMATION FROM:
SCDOT HIGHWAY MAP
LEXINGTON COUNTY, SOUTH CAROLINA
DATED: 2023

EXHIBIT B

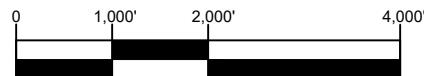




**HIGHWAY 321 RAIL SITE
LEXINGTON COUNTY, SOUTH CAROLINA
AERIAL MAP**



± 73 Acres

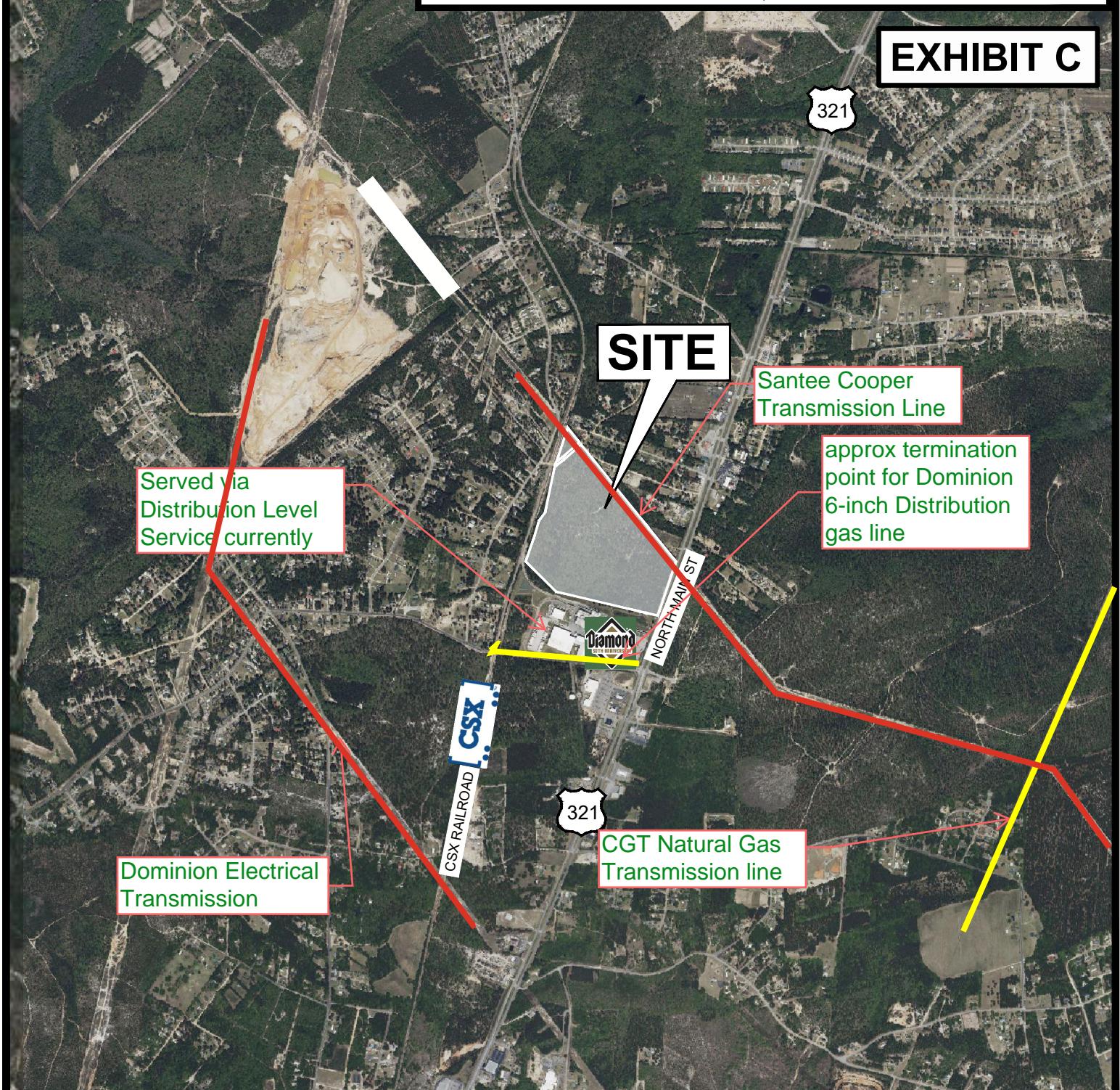


GRAPHIC SCALE: FEET
JUNE 10, 2025



CONSULTING ENGINEERS
PREPARED BY:
ALLIANCE CONSULTING ENGINEERS, INC.
INFORMATION FROM:
LEXINGTON COUNTY, SOUTH CAROLINA
USDA NRCS GEOSPATIAL GATEWAY
DATED: 2024

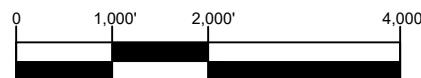
EXHIBIT C



HIGHWAY 321 RAIL SITE LEXINGTON COUNTY, SOUTH CAROLINA TOPOGRAPHIC MAP



± 73 Acres



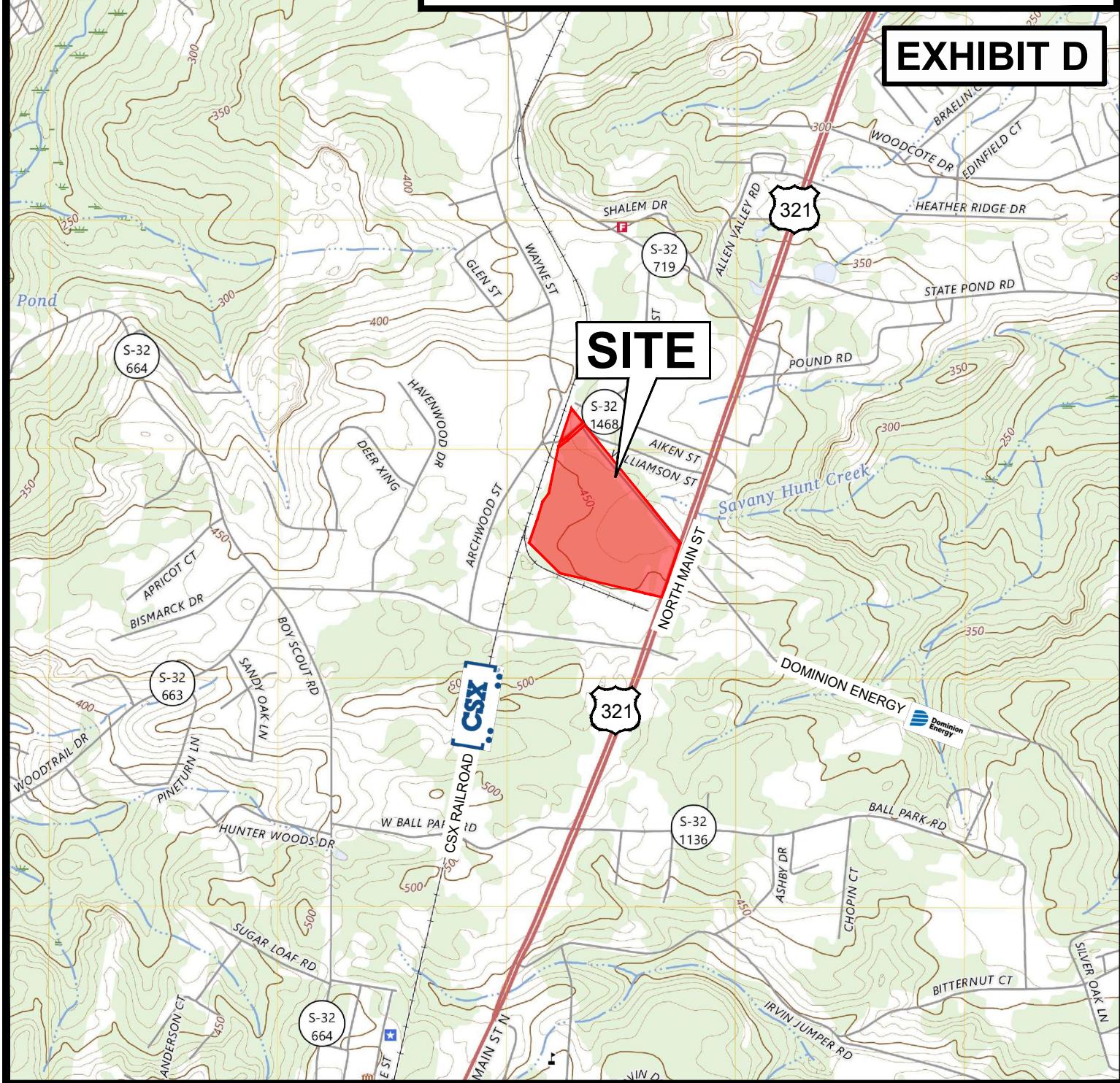
GRAPHIC SCALE: FEET
COUNTOUR INTERVAL: 10 FEET
JUNE 10, 2025



PREPARED BY:
ALLIANCE CONSULTING ENGINEERS, INC.
INFORMATION FROM:
LEXINGTON COUNTY, SOUTH CAROLINA
USGS DATA
DATED: 2024

EXHIBIT D

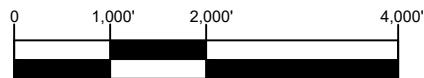
SITE



HIGHWAY 321 RAIL SITE LEXINGTON COUNTY, SOUTH CAROLINA SOILS MAP



± 73 Acres

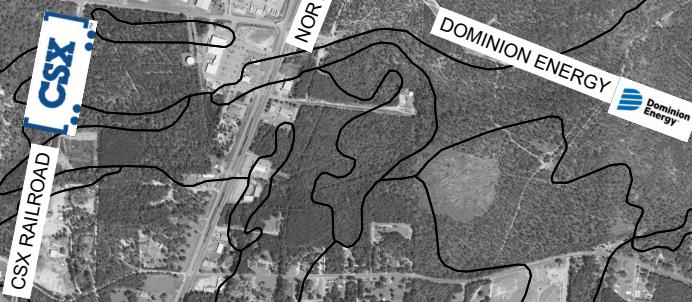


GRAPHIC SCALE: FEET
JUNE 10, 2025

ALLIANCE
CONSULTING ENGINEERS
PREPARED BY:
ALLIANCE CONSULTING ENGINEERS, INC.
INFORMATION FROM:
LEXINGTON COUNTY, SOUTH CAROLINA
USDA NRCS SOIL DATAMART
DATED 2019

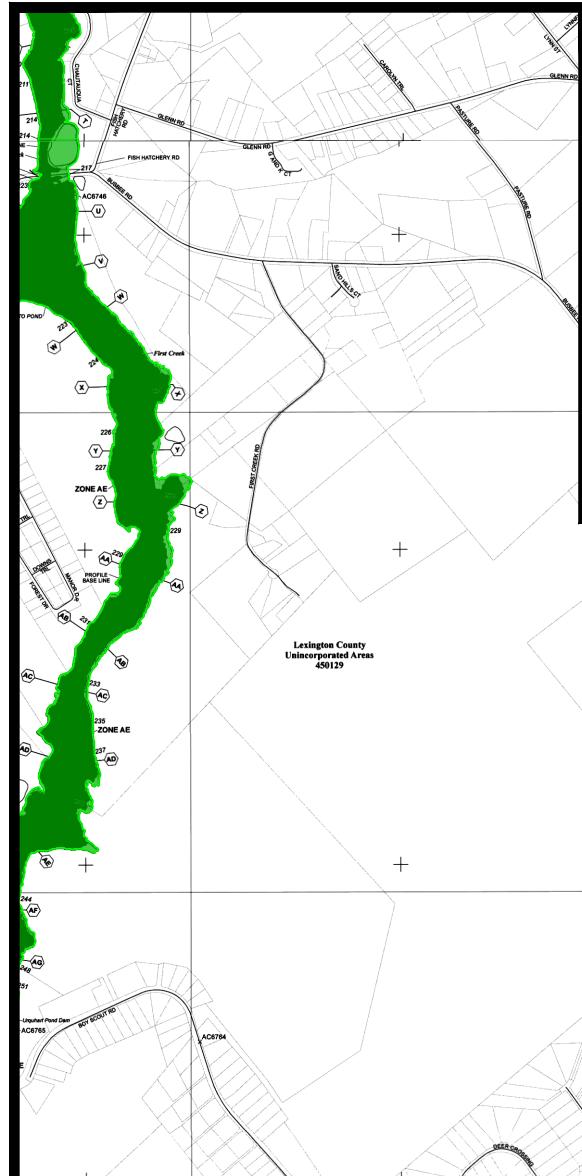
EXHIBIT E

SITE



LEGEND

Soil Type	HSG
Lakeland Soils (LAB)	A
Lakeland Sand (LkD)	A
Troup Sand (TrB)	A



**HIGHWAY 321 RAIL SITE
LEXINGTON COUNTY, SOUTH CAROLINA
FEMA FLOOD MAP**



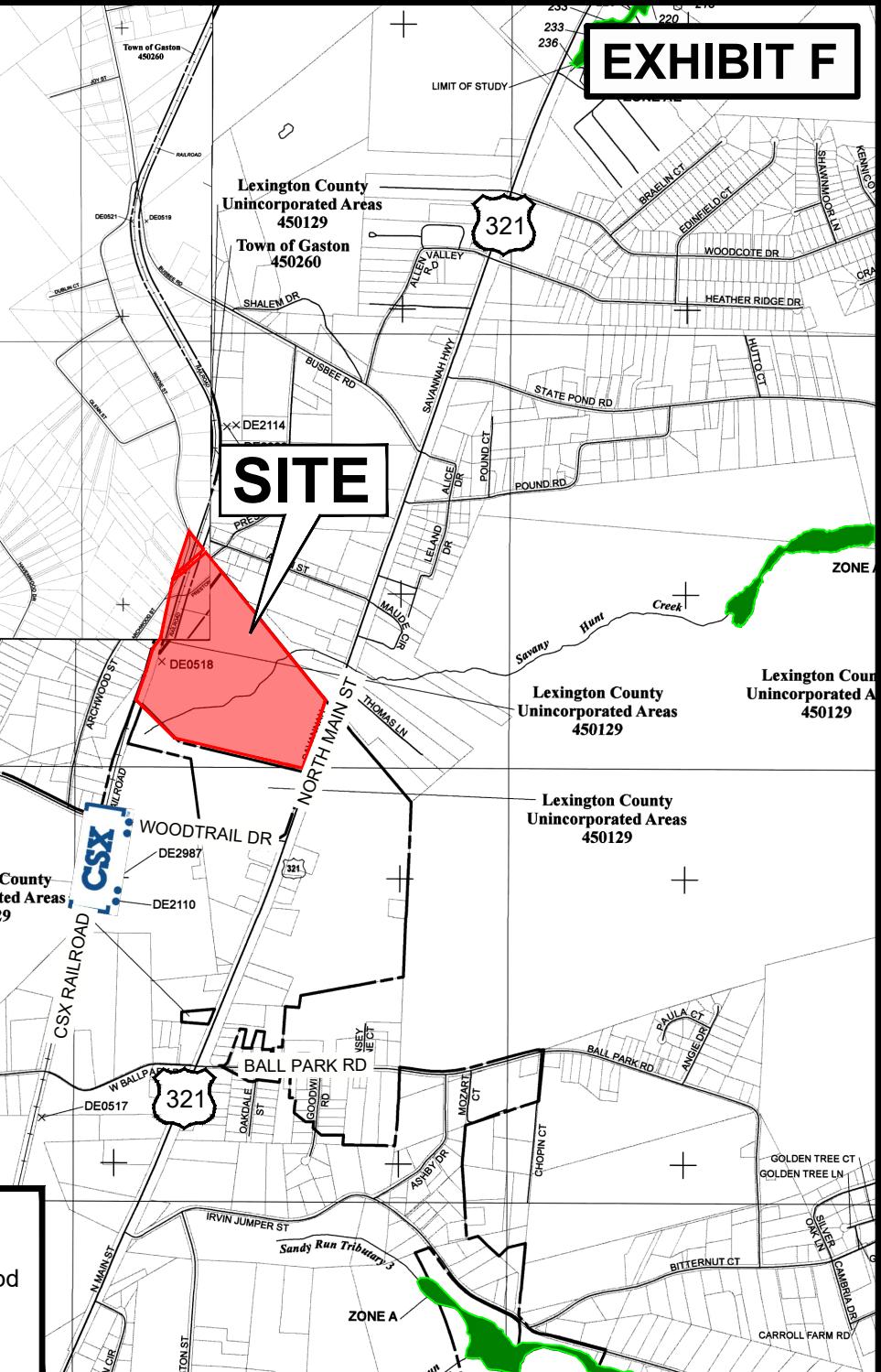
± 73 Acres



GRAPHIC SCALE: FEET
JUNE 10, 2025

PREPARED BY:
ALLIANCE CONSULTING ENGINEERS, INC.
INFORMATION FROM:
FEMA FLOOD MAP CATALOG
PANEL NO. 45063C0405J, 45063C0401J,
45063C0288J
DATED 07/05/2018

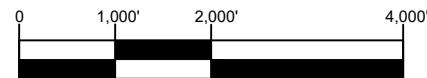
EXHIBIT F



**HIGHWAY 321 RAIL SITE
LEXINGTON COUNTY, SOUTH CAROLINA
NATIONAL WETLAND INVENTORY (NWI) MAP**



± 73 Acres



GRAPHIC SCALE: FEET
JUNE 10, 2025



PREPARED BY:
ALLIANCE CONSULTING ENGINEERS, INC.
INFORMATION FROM:
WETLAND ONLINE MAPPER
CREDIT: US FISH AND WILDLIFE SERVICE

EXHIBIT G

SITE



NORTH MAIN ST

WETLANDS LEGEND

- Freshwater Emergent
- Freshwater Forested/Shrub
- Estuarine and Marine Deepwater
- Estuarine and Marine
- Freshwater Pond
- Lake
- Riverine
- Other



3.2 Site and Vicinity General Characteristics

The approximately seventy-three (73)-Acre Highway 321 Rail Site is located along US Highway 321, approximately twelve (12) miles southeast of the Town of Lexington, County Seat of Lexington County, South Carolina; approximately twelve (12) miles southwest of the Capital City of Columbia, County Seat of Richland County, South Carolina; and approximately twenty-eight (28) miles northwest of the City of Orangeburg, County Seat of Orangeburg County, South Carolina. The *subject property* is bound to the north by a Dominion Energy electric easement and residential dwellings; to the east by US Highway 321; to the south by Diamond Pet Food; and to the west by CSX Railroad and residential dwellings. US Highway 321 is a four (4) lane divided highway that provides access to the *subject property*.

3.3 Current Site Use

The *subject property* encompasses approximately seventy-three (73)-Acres and is currently zoned Rural Development (RD) by the Town of Gaston. The purpose of this district is to protect the rural character of the Town, preserve agricultural uses, and the natural resources. The full range of agricultural uses are permitted. RD district uses include low-density residential, rural commercial properties, and institutional development.

Overhead electrical infrastructure is present along US Highway 321 and within the existing Dominion Energy electric easement along the northern boundary. Underground water infrastructure and underground telecommunications infrastructure is present along US Highway 321. Infrastructure is noted to have been located by above ground visuals; the precise location of underground infrastructure is beyond the scope of this *Phase I ESA*. Photographs of the subject property are presented in Appendix A.

3.4 Past Site Use and Ownership

A review of the Lexington County Tax Maps and recorded deeds and plats, indicate that the *subject property* is identified as Lexington County Tax Map Numbers 010100-02-004 (67.85-Acres) and 010100-02-027 (5.38-Acres). Information gathered from review of Lexington County Tax Maps, recorded deeds and plats, and personal



interviews indicate that the *subject property* has been vacant and wooded in the past. The *reasonably ascertainable* ownership histories of the parcels identified are presented below.

Lexington County Tax Map Number 010100-02-004 (67.85-Acres)

November 23, 2004: Dempsey & Lanier Holding Company, LLC acquires the *property* from Dempsey & Lanier, Inc.

June 25, 1992: Dempsey & Lanier, Inc. acquires the *property* from Ingalls Iron Works Company.

May 16, 1980: Ingalls Iron Works Company acquires the *property* from L & N Consultants, Inc.

September 27, 1976: L & N Consultants, Inc. acquires the *property* from The Lomas and Nettleton Company.

Lexington County Tax Map Number 010100-02-027 (5.38-Acres)

November 23, 2004: Dempsey & Lanier Holding Company, LLC acquires the *property* from Dempsey & Lanier, Inc.

June 25, 1992: Dempsey & Lanier, Inc. acquires the *property* from Ingalls Iron Works Company.

May 16, 1980: Ingalls Iron Works Company acquires the *property* from L & N Consultants, Inc.

September 27, 1976: L & N Consultants, Inc. acquires the *property* from The Lomas and Nettleton Company.

3.5 Adjoining Property Uses

Adjacent and adjoining properties are primarily residential in nature with one (1) industrial facility to the south. Sixteen (16) properties are located adjacent to the *subject property*, and owner information can be found in Table 1.

**TABLE 1 - ADJOINING PROPERTY OWNERS**

Tax Map No.	Acreage	Property Owner	Boundary Direction
010100-01-004	4.59	Heyward S. Kelly	East
010031-03-003	2.21	Sheryl Lynn Rudolph-Ferguson	East
010031-03-005	1.01	Margaret B. Hall	East
010031-03-006	0.93	Erick Josue Pineda Chavez and Karen Sarahy Calderon	East
010031-03-007	0.81	Hien T. Doan and Loc Cau Diep	East
010031-03-008	0.69	Luis Alberto Vidal-Bautista and Gladys Villar-Ramos	East
010031-03-009	0.56	Luis Alberto Vidal-Bautista and Gladys Villar-Ramos	East
010031-03-010	0.54	Shirley D. Bird	East
009000-01-053	0.59	Clinch H. Belser, Jr.	East
009000-02-061	0.27	Kristen Durney	North
009000-02-022	0.25	Alonso Quezada-Mendoza and Alejandra Martinez-Rodriguez	North
010100-02-030	0.44	Florence Josie H. Pender	North
010100-02-274	2.76	Larry K. Williamson	North
010100-02-022	3.83	Paul Christian Hutto	North
010100-02-003	2.00	Brenda Spires	North
010100-02-026	27.47	Diamond Pet Food Processors of SC LLC	South

3.6 Drainage

Surface and subsurface drainage is often of interest during an Environmental Site Assessment because it provides an indication of the direction in which contaminants could potentially be transported by surface waters or groundwater. Based upon a review of Lexington County's FEMA Flood Plain Map (Exhibit F), none of the *subject property* is located within a flood zone. A review of the NWI Map (Exhibit G) indicates no potential wetlands within the boundary of the *subject property*. Per the Lexington County Soil Survey (Exhibit E), the *subject property* is comprised of Lakeland (LAB, LkD) and Troup (TrB) series soils of HSG A. Soils in HSG A are well drained with high permeability. Since perimeter soil characteristics are neither conducive nor restrictive of passage of contaminants to the *subject property* due to average drainage, it is unlikely that soil composition will have much bearing on whether contaminants from off-site locations will impact the *subject property*.

The *subject property* is comprised of negligible slopes. The precise direction of groundwater flow is a parameter that is not always easily discernible for a particular site and is beyond the scope of this assessment. The USGS Topographic Map (Exhibit D) was used to characterize suspected drainage patterns on the *subject property*. Based on



the topography of the *subject property* it is believed that stormwater will generally flow northeast towards Savany Hunt Creek.



4.0 REGULATORY RECORDS REVIEW

One (1) primary purpose of this *Phase I ESA* was to perform a sufficient assessment to identify *obvious*, actual, and potential sources of contamination that might be associated with the *subject property* in question. Information related to the past and present use of the *subject property* is of extreme interest in assessing its environmental condition. Recognition of the manner in which human activities have affected the tract of land is vital in evaluating the impact that these activities may have had on the *subject property* and the environment.

Alliance Consulting Engineers, Inc. utilized the services of its sub-consultant, Environmental Data Resources, Inc. (EDR), to query the environmental regulatory lists available through the US EPA and SCDES for any regulated sites within the *approximate minimum search distance* from the *subject property* boundary. A detailed list of database acronyms is included in the Environmental Data Reports dated July 29, 2025, which are presented in their entirety as Appendix B.



Six (6) sites/facilities were identified within the *approximate minimum search distance* of the *subject property* boundary. The details of these sites/facilities are presented in Table 2.

TABLE 2 - SITES WITHIN APPROXIMATE MINIMUM SEARCH DISTANCE				
SITE OR FACILITY	DISTANCE (mi)*	DIRECTION	RELATIVE ELEV.	LISTING
MCI, LLC – Gaston, SC	0.026	NNW	Higher	UST, Financial Assurance
Diamond Pet Food	0.153	SSE	Higher	AST
Argoe's Body Shop	0.206	ENE	Lower	FINDS, RCRA-VSQG, ECHO
Food Lion	0.215	S	Higher	E MANIFEST
Meera Associates	0.306	NE	Lower	UST, LUST, Financial Assurance
Pitt Stop 43	0.315	SSE	Higher	UST, LUST, Financial Assurance

* Distances are measured radially from the centroid of the property boundary.

In addition to the *records review*, EDR completed an Aerial Photo Decade Package, Certified Sanborn Map Report, Historical Topographic Map Report, and City Directory Image Report for the *subject property* (Appendix B). Historical *aerial photographs* documenting the uses of the *subject property* for 1938, 1943, 1951, 1961, 1964, 1971, 1981, 1989, 1994, 2000, 2006, 2011, 2015, 2019, and 2023 were included within the report. The *subject property* appears to have been untouched and vacant except a small agricultural field in the center of the *subject*



property. US Highway 321 and the CSX Railroad are also present in the image dated 1938. A residential dwelling appears to have been constructed adjacent to the *subject property* along US Highway 321 in the image dated 1961. The small agricultural field in the center of the *subject property* appears to have been left to grow naturally in the image dated 1961. US Highway 321 appears to have been expanded to four (4) lanes, and an electric easement appears to have been constructed along the northern boundary of the subject property in the image dated 1971. An industrial facility and rail spur appear to have been constructed south of the *subject property* in the image dated 1981. No noticeable change, save for constant residential development around the *subject property*, has occurred from the image dated 1981 to present day.

The Certified Sanborn Map Report for the *subject property* completed by EDR indicated that *fire insurance maps* were not available for the *subject property*. The Historical Topographic Map Report includes topographic data collected in 1944, 1972, 1981, 1982, 2014, 2017, and 2020 of the *subject property*. The City Directory Image Report for the *subject property* completed by EDR provides occupancy information obtained via USA Services for addresses located along US Highway 321 adjacent to the *subject property* for 1992, 1995, 2000, 2005, 2010, 2014, 2017, and 2022.



To assist in determining the possibility of *hazardous substances* or *petroleum products* in the subsurface *environment* through vapor migration to the *subject property* from facilities within the *approximate minimum search distance* of the *subject property*, Alliance Consulting Engineers, Inc. consulted the EDR Vapor Encroachment Screen prepared using EDR's Vapor Encroachment Worksheet, which references databases comprising of facilities likely correlated with *hazardous substance* or *petroleum product* vapor contamination due to typical operations at the facilities. A Vapor Encroachment Screen conducted in accordance with *ASTM E 2600-22: Vapor Encroachment Screening* is used to identify, to the extent feasible pursuant to *ASTM E 2600-22*, if a *vapor encroachment condition (VEC)* exists at the *property*. *ASTM E 2600-22* defines a *VEC* as the presence or likely presence of *hazardous substances* or *petroleum product* vapors in the subsurface of the *subject property* caused by the release of vapors from contaminated soil or groundwater either on or near the *property*. *ASTM E 1527-21* states that a Vapor Encroachment Screen is not required to achieve compliance with *all appropriate inquiries*; however, a Vapor Encroachment Screen can be useful in conducting an *environmental site assessment* of a *subject property* to assist in determining whether *hazardous substance* or



petroleum product vapors are *migrating* towards the *property*. Four (4) sites/facilities were identified in the Vapor Encroachment Screen; however, only one (1) site/facility is hydraulically upgradient of the *subject property*. Pitt Stop 43 is not recognized as a *VEC* with regards to the *subject property*, due to a No Further Action determination that was made regarding their *past release* and will be further details in Section 7.0 – Findings and Opinions. No *VEC* exists for the *subject property*.

ASTM E 1527-21 states that all *obvious* uses of the *subject property* shall be identified from the present, back to the *subject property*'s first developed use, or back to 1940, whichever is earlier. A review of *standard historical sources* at less than approximately five (5) year intervals is not required by *ASTM E 1527-21*. The standard also states that if the specific use of the *subject property* appears unchanged over a period of longer than five (5) years, then it is not required to research the use of the *subject property* during that time. *Standard historical sources* regarding the historical uses of the *subject property* at five (5) year intervals were not available at the time of preparation of this *report*, which constitutes a *data failure*. The standard states that historical research is complete when a *data failure* is encountered. A *data failure* is not uncommon when trying to determine the uses of the *property* at five (5) year intervals back to the first developed use, or back to 1940, whichever is earlier. Based on the Aerial Photo Decade Package, as detailed in Section 4.0 of this *report*, the *subject property* has historically been vacant and forested land from 1938 to present, and no *data failure* or *data gap* exists with regard to the *subject property*.



5.0 SITE RECONNAISSANCE

5.1 Methodology and Limiting Conditions

Alliance Consulting Engineers, Inc. performed a *site reconnaissance* of the *subject property* on September 3, 2025. The *subject property* was observed by traversing the perimeter and interior of the *property*, as well as the use of aerial drone photography. The reconnaissance involved viewing *adjoining properties* and structures from publicly accessible areas. Observation of nearby properties was limited to areas visible in the line of sight from public roadways. A vehicular tour of the area was made to confirm the locations of facilities listed by regulatory agencies and to verify nearby land use.

5.2 Exterior Observations

Exterior conditions or items that were observed are depicted in Table 3.

TABLE 3 - OBSERVED EXTERIOR CONDITIONS OR ITEMS

Conditions or Items	Observed	If yes, describe
a. above ground storage tanks	No	
b. underground storage tanks	No	
c. pipelines/utility lines	Yes	Electric, water, and telecommunications infrastructure along <i>property</i> boundaries
d. damaged/leaking transformers	No	
e. surface impoundment/holding ponds	No	
f. monitoring wells	No	
g. remedial cleanup activity	No	
h. landfill/burial activity	No	
i. chemical/petroleum spills or releases	No	
j. gas/oily sheens on water (excluding parking lot ponding)	No	
k. chemical/petroleum odors	No	
l. stained or discolored soil	No	
m. distressed/discolored vegetation (chemically impacted)	No	
n. dumping	Yes	Miscellaneous household debris
o. stored substances/drums/ containers/vats	No	
p. spray rigs/tankers/mobile storage tanks	No	
q. marshes/low lying wetlands	No	
r. air emission facilities	No	



5.3 Interior Observations

There were no structures present on the *subject property*; therefore, no interior observations were made during the *site reconnaissance*.



6.0 INTERVIEWS

On September 15, 2025, Ms. Helen Lanier, the *Owner Representative* for the *subject property*, indicated that to the best of her knowledge and belief there are currently no known nor have been any environmental liens or governmental notifications relating to environmental laws; nor any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of *hazardous substances* or *petroleum products* on the *subject property*. Ms. Lanier did not have any additional knowledge of any *hazardous substances*, *petroleum products*, unidentified waste materials, tires, automotive or industrial batteries, or other waste materials being dumped above grade, buried, and/or burned on the *subject property*. This correspondence is included in Appendix C.

On September 15, 2025, Mr. Garrett Dragano, the *End User* of this *Phase I ESA*, indicated that to the best of his knowledge and belief there are currently no known nor have been any environmental liens or governmental notifications relating to environmental laws; nor any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of *hazardous substances* or *petroleum products* on the *subject property*. Mr. Dragano did not have any additional knowledge of any *hazardous substances*, *petroleum products*, unidentified waste materials, tires, automotive or industrial batteries, or other waste materials being dumped above grade, buried, and/or burned on the *subject property*. This correspondence is included in Appendix C.



7.0 FINDINGS AND OPINIONS

During the *records review* and *site reconnaissance*, the *subject property* features, activities, uses and conditions, which may indicate the presence or likely presence of *hazardous substances* or *petroleum products* at the *subject property*, were reviewed to determine if the findings, but not necessarily all findings, may be indicative of a *recognized environmental condition (REC)*, *controlled environmental condition (CREC)*, *historical recognized environmental condition (HREC)*, or *de minimus conditions*. *Historical recognized environmental conditions* and *de minimus conditions* are not considered *recognized environmental conditions*.

MCI, LLC – Gaston, SC (MCI) is located 0.026 miles north northwest and upgradient of the *subject property*. MCI is listed in the Underground Storage Tank (UST) database and Financial Assurance Database. MCI is listed in the UST database due to the presence of one (1) abandoned UST and one (1) currently in use UST. The abandoned UST is a 550-gallon diesel tank and the UST currently in use is a 600-gallon diesel tank. Financial Assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay. MCI is listed as having Environmental Insurance as their assurance mechanism. This liability insurance must be obtained from a qualified insurer or risk retention group. The policy must specifically address releases from USTs and provide a copy of the policy or the Certificate of Insurance Endorsement. This insurance must have a minimum liability limit of \$25,000 per occurrence/annual aggregate. Based on the regulatory records indicating that there have been no releases of *petroleum products* from the USTs, it is the opinion of the *environmental professional* that MCI is not considered a *REC* with regards to the *subject property*.

Diamond Pet Food (Diamond) is located 0.153 miles south southeast and upgradient of the *subject property* and is listed in the Aboveground Storage Tank (AST) database for one (1) 20,000-gallon AST containing animal fat. Records indicate that this AST is properly installed and contained in a concrete catch basin with no violations or releases noted. For these reasons it is the opinion of the *environmental professional* that Diamond is not considered a *REC* with regards to the *subject property*.

Argoe's Body Shop (Argoe's) is located 0.206 miles east northeast and downgradient of the *subject property*. Argoe's is listed in the Resource Conservation and Recovery Act – Very



Small Quantity Generator (RCRA-VSQG), Facility Index System (FINDS), Enforcement and Compliance History Online (ECHO) database. Argoe's is listed in the RCRA-VSQG database for their handling and transport of *hazardous substances* with waste code D001. One (1) violation was noted on June 12, 1997, and was subsequently brought back into compliance on May 1, 1998. The FINDS and ECHO databases are online tools that allow the public to look up facilities with various permits and can track violations. No violations were noted with regard to the FINDS or ECHO database listings. Argoe's is downgradient of the *subject property*, and while there has been a violation with regard to the RCRA-VSQG database listing, it was brought back into compliance. Therefore, it is the opinion of the *environmental professional* that Argoe's is not considered a *REC* with regard to the *subject property*.

Food Lion is located 0.215 miles south and upgradient of the *subject property* and is listed in the Hazardous Waste Electronic Manifest System (E MANIFEST). E MANIFEST is a national system for tracking *hazardous waste* shipments electronically. This system was implemented to modernize the nation's cradle-to-grave hazardous waste tracking process while saving valuable time, resources, and dollars for industries and states. No violations were noted with this database listing. For this reason, it is the opinion of the *environmental professional* that Food Lion is not considered an *REC* with regard to the *subject property*.

Meera Associates (Meera) is located 0.306 miles northeast and downgradient of the *subject property*. Meera is listed in the Leaking Underground Storage Tank (LUST) database, UST database, and Financial Assurance Database. Meera is listed in the LUST database for two (2) past releases of *petroleum products*. The first release was a Class 2BB release on January 30, 2003, with cleanup initiated on March 13, 2003, and a No Further Action (NFA) determination made on April 14, 2004. The second release was a Class 2BB release on December 17, 2021, with cleanup initiated on January 7, 2022, and an NFA determination made on January 7, 2022. A Class 2BB release indicates that water supply wells are less than 1,000-feet downgradient of the release. Meera is listed in the UST database for five (5) currently in use USTs that include three (3) 8,000-gallon gasoline tanks, one (1) 8,000-gallon diesel tank, and one (1) 6,000-gallon diesel tank. Financial Assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay. Meera is listed as being Self-insured as their assurance mechanism. Self-insurance requires that an owner or operator



show a tangible net worth of \$50,000 or more and must provide an annual financial statement and letter prepared by a Certified Public Accountant, Licensed Public Accountant, a board-licensed Accounting Practitioner or the chief financial officer of the company to SCDES. Although there have been two (2) past releases of *petroleum products*, there were NFA determinations made with regard to these releases. Based on these NFA determinations, it is the opinion of the *environmental professional* that Meera is not considered a *REC* with regards to the *subject property*.

Pitt Stop 43 is located 0.315 miles south southeast and upgradient of the *subject property*. Pitt Stop 43 is listed in the LUST database, UST database, and Financial Assurance Database. Pitt Stop 43 is listed in the LUST database for a release on August 18, 2021, with cleanup initiated on September 3, 2021, and an NFA determination made on September 3, 2021. Pitt Stop 43 is listed in the UST database for two (2) currently in use USTs that include two (2) 20,000-gallon multiple petroleum tanks. Financial Assurance is intended to ensure that resources are available to pay for the cost of closure, post-closure care, and corrective measures if the owner or operator of a regulated facility is unable or unwilling to pay. Pitt Stop 43 is listed as being Self-insured as their assurance mechanism. Self-insurance requires that an owner or operator show a tangible net worth of \$50,000 or more and must provide an annual financial statement and letter prepared by a Certified Public Accountant, Licensed Public Accountant, a board-licensed Accounting Practitioner or the chief financial officer of the company to SCDES. Although there has been a past release of *petroleum products*, there was an NFA determination made with regard to this release. Based on this NFA determination, it is the opinion of the *environmental professional* that Pitt Stop 43 is not considered a *REC* with regards to the *subject property*.

Overhead electric infrastructure is present along the northern boundary of the *subject property* within an existing Dominion Energy easement. These lines appear in proper working order, and no transformers are present. Overhead power lines are also present along US Highway 321 with no transformers present. Nothing associated with the electric infrastructure appears to pose an environmental threat and is therefore not considered a *REC* with regards to the *subject property*.



Underground water infrastructure is present along US Highway 321 and appears to be in proper working order. Nothing associated with the water infrastructure appears to pose an environmental threat and is therefore not considered a *REC* with regards to the *subject property*.

Underground telecommunication infrastructure is present along US Highway 321 and appears to be in proper working order. Nothing associated with the telecommunication infrastructure appears to pose an environmental threat and is therefore not considered a *REC* with regards to the *subject property*.

Miscellaneous household debris was noted along roadways and within a portion of the *subject property* that is accessible via the Dominion Energy easement. No buckets, barrels, or other containers of potentially *hazardous materials* were observed with this miscellaneous household debris; therefore, it is the opinion of the *environmental professional* that this illegal dumping is not considered a *REC* with regards to the *subject property*.



8.0 CONCLUSIONS

The *Phase I ESA* has been performed in conformance with the scope and limitations of *ASTM E 1527-21: Standard Practice for Environmental Site Assessments* of the *subject property*. Any exceptions to, or deletions from, this practice are described in Section 9.0 of this report. This assessment has revealed no evidence of *recognized environmental conditions* in connection with the approximately seventy-three (73)-Acre Highway 321 Rail Site. No further assessment is needed at this time for the *subject property*.



9.0 DEVIATIONS

Alliance Consulting Engineers, Inc. project personnel have attempted to prepare this *Phase I ESA* in conformance with *ASTM E 1527-21: Standard Practice for Environmental Site Assessments*, which was approved on February 13, 2023, and to our knowledge and practice have not deviated from the standard.



10.0 REFERENCES

1. *ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. West Conshohocken, PA: ASTM International, February 13, 2023.
2. *Soil Survey of Lexington County, South Carolina*. US Department of Agriculture, Soil Conservation Service, in Cooperation with South Carolina Agricultural Experiment Station and South Carolina Land Resources Conservation Commission, 1976.
3. Lexington County Registry of Deeds, Lexington County, South Carolina. Accessed August 29, 2025.



11.0 SIGNATURES OF ENVIRONMENTAL PROFESSIONALS

We declare that, to our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in Section 312.10 of 40 CFR Part 312. We have specific qualifications based on education, training, and experience to assess properties of this nature, history, and setting of the approximately seventy-three (73)-Acre Highway 321 Rail Site located along US Highway 321 in the Town of Gaston in Lexington County, South Carolina. We have developed and performed all *appropriate inquiries* in conformance with the standards and practices set forth in 40 CFR Part 312.

A blue ink signature of Kyle M. Clampitt, P.E.

Kyle M. Clampitt, P.E.

Senior Vice President

A blue ink signature of T. Ryan Merritt, P.E.

T. Ryan Merritt, P.E., LEED Green Associate

Project Engineer



12.0 STATEMENT OF QUALIFICATIONS

Alliance Consulting Engineers, Inc. is a South Carolina-based consulting engineering firm engaged in the practice of civil and environmental engineering. The firm was founded in 2004, and has offices located in Columbia, South Carolina; Bluffton, South Carolina; Greenville, South Carolina; Charleston, South Carolina and Charlotte, North Carolina. The staff of Alliance Consulting Engineers, Inc. currently consists of three (3) principals, six (6) senior project managers, two (2) project managers, six (6) project engineers, nine (9) engineering associates, nine (9) CAD technicians, three (3) regional managers, four (4) business development directors, two (2) design associate, and two (2) senior administrative assistants. Alliance Consulting Engineers, Inc.'s staff includes eighteen (18) registered Professional Engineers, eleven (11) LEED Green Associates, and the firm is properly licensed to practice engineering in South Carolina and eighteen (18) other states.

The firm is regularly involved in performing engineering services for industrial, municipal, institutional, and commercial clients on projects that span the breadth of the civil and environmental engineering disciplines. Environmental work regularly performed by the firm includes Potable Water Facilities, Wastewater Facilities, Stormwater Facilities, Environmental Site Assessments, Air Quality Permitting, and Solid Waste Management. The firm has performed numerous *Environmental Site Assessments*.

This *Phase I ESA* has been completed under the direction of Mr. Kyle M. Clampitt, P.E. Mr. Clampitt has twenty-one (21) years of engineering experience and currently Serves as Senior Vice President and Senior Project Manager with responsibilities that include client coordination; design in concrete, steel and site drainage; oversight of plan generation; direct involvement and responsibility for permit applications; project estimates and scheduling; and extensive building code review. In addition, Mr. Clampitt is responsible for overseeing the project management of solid waste facilities and environmental assessments. Mr. Clampitt graduated from Purdue University with a Bachelor of Science in Civil Engineering, 2001. Mr. Clampitt is a Professional Engineer that is licensed to practice in the State of South Carolina and Indiana. Mr. Clampitt's resume has been included in Appendix D of this *Phase I ESA*.