

Phase I Environmental Site Assessment Report

Prepared for:

City of Rawlins

P.O. Box 953
Rawlins, WY 82301

*City of Rawlins Landfill Expansion
3001 Gun Club Road
Carbon County, Wyoming*

October 3, 2014

17663-HW

Prepared by:



INBERG-MILLER ENGINEERS
1120 East "C" Street
Casper, WY 82609



INBERG-MILLER ENGINEERS

Quality Solutions Through Teamwork

October 3, 2014

17663-HW

Danielle Gross
City of Rawlins
P.O. Box 953
Rawlins, WY 82301

RE: PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT
CITY OF RAWLINS LANDFILL EXPANSION
3001 GUN CLUB ROAD
RAWLINS, CARBON COUNTY, WYOMING, 82301

Dear Ms. Gross:

Enclosed are the original and one copy of our Environmental Site Assessment Report for the above-referenced property. A PDF copy has also been emailed. The work described in this report has been completed in accordance with our Service Agreement dated August 29, 2014.

It has been a pleasure participating in this project. We are available to provide additional services, at your request, such as civil or environmental engineering services, review final plans and specifications, perform construction surveying, field and laboratory construction materials testing, and observe excavations as may be required. If you have any questions or comments, please contact us at 307-577-0806.

Sincerely,

INBERG-MILLER ENGINEERS

W. Eric Nunn, E.I.T.
Environmental Engineer

WEN:ETG:cno\\Ime01\17663-HW CITY OF RAWLINS Rawlins Landfill ESA\Phase 1 ESA\17663-HW ESA Rpt

Enclosures as stated

TABLE OF CONTENTS

TRANSMITTAL LETTER.....	i
TABLE OF CONTENTS.....	ii
SUMMARY.....	1
INTRODUCTION.....	1
SCOPE OF SERVICES.....	1
SITE DESCRIPTION.....	2
USER PROVIDED INFORMATION.....	2
LIMITATIONS, DEVIATIONS, AND ASSUMPTIONS.....	3
RECORDS REVIEW.....	3
RADIUS SEARCH MAP.....	4
DATABASE SUMMARY.....	5
HISTORICAL SUMMARIES.....	5
SITE RECONNAISSANCE.....	6
GENERAL SITE SETTING.....	7
EXTERIOR OBSERVATIONS.....	7
INTERIOR OBSERVATIONS.....	7
INTERVIEWS.....	7
DATA GAP ANALYSIS.....	8
FINDINGS AND CONCLUSIONS.....	9
QUALIFICATIONS OF THE ENVIRONMENTAL PROFESSIONAL.....	9
CLOSURE.....	10
REFERENCES CITED.....	11
APPENDIX A - SITE DESCRIPTION	
Site Location Map	
Site Map	
Rawlins Landfill Expansion Site Plan	
Site Photographs	
Site Reconnaissance Notes	
APPENDIX B – RECORDS REVIEW INFORMATION	
Disk: EDR Reports (Original Report Only)	
EDR Radius Map Report/Executive Summary, dated September 17, 2014	
EDR Site Report- Rawlins Landfill, dated October 1, 2014	
EDR Aerial Photo Decade Package, dated September 18, 2014	
EDR Sanborn Map Report, dated September 17, 2014	
EDR City Directory Image Report, dated September 19, 2014	
EDR Historical Topographic Map Report, dated September 17, 2014	
Environmental Database List	

APPENDIX C – INTERVIEW DOCUMENTATION

Danielle Gross - Administrative Secretary, City of Rawlins

Pat Martinez- Landfill Foreman, City of Rawlins

Nile Layton- Physical Scientist/Hazmat Coordinator, Bureau of Land Management (BLM)

Travis Bargsten- Physical Scientist/Hazmat Coordinator, Bureau of BLM

Rebecca Dietrich- Solid Waste & Corrective Action Program, Wyoming Department of Environmental Quality-Solid & Hazardous Waste Division (WDEQ-SHWD)

APPENDIX D - ADDITIONAL INFORMATION

Resumes of Report Preparers

Important Information About Your Geoenvironmental Report

WDEQ SHWD-Storage Tank Program-Important Information about Leaking Regulated Storage Tanks

SUMMARY

A Phase I Environmental Site Assessment (ESA) was performed for the City of Rawlins on property located north of the City of Rawlins Landfill at 3001 Gun Club Road, Rawlins, Carbon County, Wyoming. The property was evaluated by Inberg-Miller Engineers (IME), and is native prairie managed by the Bureau of Land Management (BLM). The Phase I ESA was performed in general conformance with the American Society for Testing Materials (ASTM) Practice E1527-13. Any exceptions to, or deletions from the practice is described in the scope of services of this report.

A recognized environmental condition (REC) is defined in ASTM E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property due to any release 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. In conformance with ASTM E1527-13, we provide our professional opinion of the presence of potential RECs in connection with the subject property and determine if any potential RECs would qualify as historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), or de minimis conditions.

This assessment did not reveal any RECs in connection with the property. Our assessment did identify the following potential concerns that, in our opinion, do not qualify as RECs but should be considered in the overall evaluation of the property.

- During the Phase I ESA site reconnaissance, scattered solid waste blown in from the City of Rawlins Landfill consisting of plastic bags, plastic sheeting, plastic containers, aluminum cans, and cardboard was observed in the southeast portion of the subject property. We consider the scattered solid waste a de minimus condition as it is unlikely to be a significant environmental liability.

Based on the information reviewed, no further assessment action is recommended at this time.

INTRODUCTION

The purpose of this Phase I ESA was to identify RECs at the subject property. A REC is defined in ASTM E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property due to any release 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. The subject property was evaluated using standard techniques including historical records review, site reconnaissance, and interviews.

SCOPE OF SERVICES

The scope of services was developed based upon existing information about the subject site and current practices for performing Phase I ESA's in accordance with ASTM E1527-13 "Standard Practice For Environmental Site Assessments: Phase I Environmental Site Assessment Process". Please refer to our proposal dated August 29, 2014 for a complete description of our Scope of Services.

This report was prepared for the City of Rawlins to be used in their evaluation of the subject property. As requested by the City of Rawlins, reliance has been extended to the BLM within the constraints of the service agreement between the City of Rawlins and IME. The contents should not be relied upon by any

party other than the aforementioned without the express written consent of IME. The information is relevant to the dates of our site work and should not be relied on to represent conditions at later dates.

The opinions expressed herein are based on information obtained during this Phase I ESA and on our experience. If additional information becomes available, we request the opportunity to review the information and modify our opinions, if necessary.

Our services have been provided using the degree of care and skill ordinarily exercised, under similar circumstances, by environmental consultants practicing in this similar locality. No warranty, expressed or implied, is made as to the professional opinions presented in this report.

SITE DESCRIPTION

The subject property is located north of the City of Rawlins Landfill at 3001 Gun Club Road, Rawlins, Carbon County, Wyoming, Latitude N 41° 50' 12.84", Longitude W 107° 12' 3.24". Specifically, the property is described as the S1/2 NE1/4 Section 34, T 22N R87W. The approximately 80-acre property is undeveloped native prairie managed by the BLM. The site is accessed by a gravel road through the Rawlins Landfill north boundary. The subject property features fine sandy topsoil with sagebrush and sparse grass vegetation. The property had previously been used for seasonal cattle grazing and wildlife habitat. The property is bordered on the north and east by undeveloped native prairie managed by the BLM, on the south by the existing Rawlins Landfill, and on the west by undeveloped land owned by the Rawlins Shooting Range. The vicinity is primarily undeveloped land with the exception of the Rawlins Shooting Range and the Rawlins Landfill, both located to the south off of Gun Club Road.

According to the Geologic Map of Wyoming, as prepared by the USGS, and our understanding of the geology in the area, it is our opinion that the subject property is underlain by Miocene tuffaceous sedimentary bedrock. Depth of the water table is estimated to be less than 50 feet below the ground surface and based on Geocheck information is assumed to flow to the southeast following the surface topography. The elevation at the subject property is approximately 6,940 feet above sea level.

The Site Location Map, Site Map, Site Photographs, Rawlins Landfill Expansion Site Plan, and Site Reconnaissance Notes in Appendix A describe the subject property in greater detail.

USER PROVIDED INFORMATION

The City of Rawlins provided IME with beneficial information to assist in this assessment. This Phase I ESA was conducted as requested by the City of Rawlins to document the existing site conditions as part of a potential conveyance from BLM management to the City of Rawlins. The current property owner is the BLM. The City of Rawlins provided a map showing the location of the property to assist in with the assessment. The Rawlins Landfill Expansion Site Plan is included in Appendix A.

As required by the Small Business Liability Relief and Brownsfields Revitalization Act of 2001, the user must provide IME with a response to the required client questionnaire as part of all appropriate inquiry into the past ownership of the property. By fulfilling all appropriate inquiry the user may qualify for one of the Landowner Liability Protections (LLPs). The client's response to the user questionnaire is summarized in the following list:

- Unaware of any environmental cleanup liens against the property.

- Unaware of any Activity Use Limitations that are in place at the site.
- No specialized knowledge relating to the property or nearby properties.
- Confirmed a fair market price for the purchase price of the property.
- Unaware of any known or reasonable ascertainable information that would help identify conditions that indicate a potential release.
- No knowledge of past uses of the property.
- No knowledge of specific chemicals that are, or were, present on the property.
- No knowledge of past chemical spills at the property.
- No knowledge of environmental cleanups at the property.
- No knowledge of the presence of contamination at the property.

The client questionnaire is part of the client interview and is included in Appendix C.

LIMITATIONS, DEVIATIONS, AND ASSUMPTIONS

This Phase I ESA was performed in general conformance with the ASTM Practice E1527-13. Any anticipated exceptions to, or deletions from the practice were described in our proposal dated August 29, 2014. As part of any ESA, IME made significant assumptions within this assessment to focus our efforts on the agreed scope of services. These significant assumptions include:

- Interviewees answered in good faith and to the extent of their knowledge.
- Past and present site operations result with site conditions relative to potential releases and no intentional concealment of environmental conditions or releases have occurred.
- Vapor migration will be considered and discussed if a related environmental condition is identified; otherwise, it is generally not a concern.
- A physical regulatory file review was not performed as additional files requiring a file review were not identified.
- All Wyoming Department of Environmental Quality- Storage Tank Program (WDEQ-STP) Resolved Contaminated Sites require no further investigation. Unresolved contaminated sites are not a concern to the subject property as long as the site is registered with the WDEQ-STP. Important Information about Leaking Regulated Storage Tanks is included in Appendix D.
- Groundwater flows southeast following the general surface topography of the area.

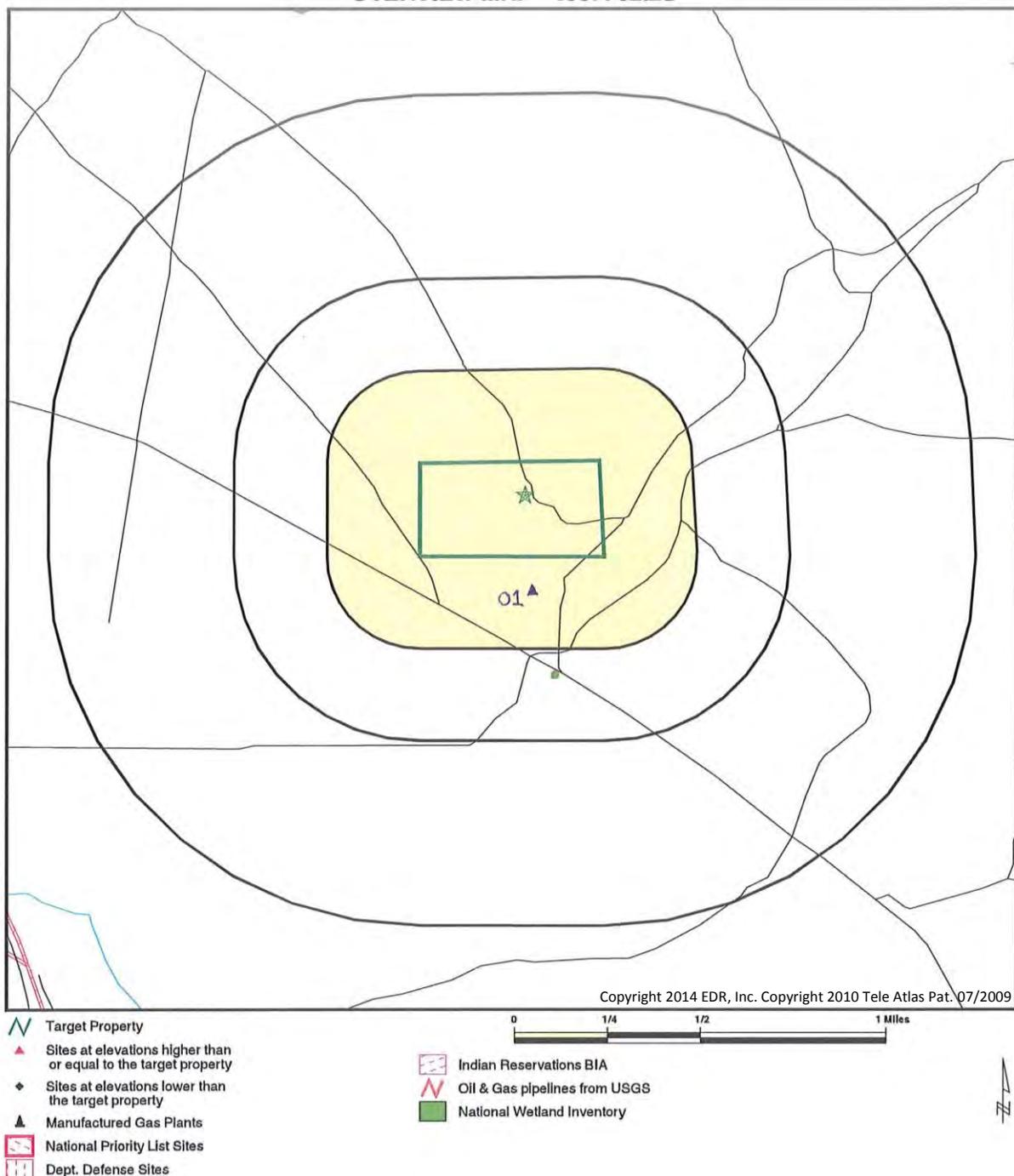
RECORDS REVIEW

IME conducted a review of available environmental records maintained by various regulatory agencies to determine if the subject property or nearby properties are listed as having a past or present record of environmental concerns in the area that may impact the subject property. The distance searched was

performed in accordance with ASTM standard E1527-13. Standard federal, state, and tribal environmental records were reviewed as well as additional sources found in the Environmental Data Resources (EDR) Radius Report. A list of all the databases searched and their definitions is found in the Environmental Database List in Appendix B.

The EDR Radius Report, included in Appendix B, was reviewed for potentially relevant sites. Sites included in the orphan summary of the report were also evaluated for potential impacts to the subject property. Orphan summary sites are facilities where the mapping database is unclear as to their location.

RADIUS SEARCH MAP



DATABASE SUMMARY

Map ID	Facility Name and Location	Approximate Distance/Direction	Database Listing	Explanation/Concern
O1	RAWLINS LANDFILL 3/4 N. OF RAWLINS, HIGHWAY 287 (ORPHAN SITE LISTING)	ADJOINING TO THE SOUTH	FINDS	The FINDS database is a master tracker for other databases. The Rawlins Landfill is listed with some RCRA information in 2007, and an EIS Criteria and Hazardous Air Pollutant inventory. No other information is listed. These listings are common for a permitted landfill and are not a concern based on information in the database.

HISTORICAL SUMMARIES

In addition to the regulatory databases, standard historical sources were utilized to help identify the past uses of the subject property and vicinity that are significant to RECs in connection with the property. The history of the site has been developed based on the EDR Historical Topographic Map Report, which utilizes U.S. Geological Survey (USGS) Quadrangle 7.5-Minute Series Maps (7.5-Minute Quad), the EDR City Directory Image Report, and the EDR Aerial Photos. The Sanborn Fire Insurance Map Report did not provide IME with any further information regarding the subject property.

EDR Aerial Photos	Subject Property	North	East	South	West
1946	Native prairie with a low lying area in the NE corner	Native prairie, hillsides	Native prairie, flat drainage area	Native prairie with a two-track road	Native prairie with a two-track road and a drainage area
1949	No major changes	No major changes	No major changes	No major changes	No major changes
1954	No major changes	No major changes	No major changes	No major changes	No major changes
1975	No major changes	No major changes	No major changes	Some development activity, possibly the original Rawlins Landfill	No major changes
1989	No major changes	No major changes	No major changes	Significant development, the Rawlins Landfill is visible, grading activity visible near the SE corner of the subject property	No major changes
1994	No major changes	No major changes	No major changes	No major changes besides grading directions at the Rawlins Landfill	No major changes
2001	No major changes	No major changes	No major changes	The Rawlins Shooting Range is visible to the SW	No major changes
2006	The two-track access road in the east section of the property is visible	No major changes	No major changes	No major changes	No major changes
2009	No major changes	No major changes	No major changes	No major changes	No major changes

EDR Aerial Photos	Subject Property	North	East	South	West
2012	Access to the monitoring well along the south boundary is visible	No major changes	No major changes	No major changes	No major changes

No potential concerns were identified in the aerial photos. The EDR aerial photos are included in appendix B.

USGS 7.5-Minute Quad	Subject Property	North	East	South	West
1953	Vacant land with several two-track roads located in the east portion of the property	Vacant land and a two-track road	Vacant land, several two-track roads and some intermittent ponds to the SE	Vacant land and several two-track roads	Vacant land and several roads
1981	No major changes	No major changes	No major changes	Several new two-track roads and the development of the Rawlins Landfill	No major changes
1984	Too large of scale	Too large of scale	Too large of scale	Too large of scale	Too large of scale

The USGS 7.5-Minute Quad did not reveal any potential concerns. USGS 7.5-Minute Quad is included in Appendix B.

The EDR City Directory Image Report provided historical ownership of the subject property and adjoining properties according to the addresses provided to EDR. EDR searched for directories along Gun Club Road and Highway 287. Listings were found for Gun Club Road in 2013. The adjoining Rawlins Landfill is listed as the Rawlins City Government at 3001 Gun Club Road in 2013. Listings were found for Highway 287 in 1992, 1995, and 2013. All the properties listed along Highway 287 are within the City of Rawlins and are outside the standard search distance. No potential concerns were identified in the city directories and are included in Appendix B.

The Wyoming Oil and Gas Conservation Commission records were reviewed for Section 34, T 22N, R 87W. No records of oil wells, injection wells, or production data exist for Section 34.

SITE RECONNAISSANCE

The objective of the site reconnaissance is to obtain information identifying RECs in connection with the subject property. Our site reconnaissance included visiting the subject property, observing interior and exterior areas, and observing the property from public right of ways. Our site reconnaissance included observing adjacent businesses and identifying facilities within the immediate vicinity that could present conditions that indicate a REC at the subject property. Eric Nunn, of IME, visited the subject and surrounding properties on September 17, 2014. Pat Martinez of the City of Rawlins Landfill Staff provided site access during the site visit.

GENERAL SITE SETTING

The subject property is undeveloped native prairie managed by the BLM. The site has been used for cattle grazing and wildlife habitat. The subject property is approximately 80-acres in size and has multiple two-track roads located on the east side of the site for BLM land access. The north and east sides of the property are unfenced. The property is bordered on the north and east by undeveloped native prairie managed by the BLM, on the south by the existing Rawlins Landfill, and on the west by undeveloped land owned by the Rawlins Shooting Range. The closest road intersection is Gun Club Road and Highway 287 to the southwest. No structures, potable water, or waste water disposal services exist at the subject property.

EXTERIOR OBSERVATIONS

All four corners of the property were observed and had respective survey markers. One monitoring well was observed in the southeast portion of the property and is part of the Rawlins Landfill groundwater monitoring network. Scattered solid waste consisting of plastic bags, plastic sheeting, plastic containers, aluminum cans, and cardboard were observed in the southeast portion of the subject property. The solid waste was blown in from the City of Rawlins Landfill. A low lying runoff area in the northwest corner collects most of the runoff in the area and is absent of vegetation due to poor soil and saturated conditions. Pits, lagoons, unidentified containers, septic systems, hazardous substances, petroleum products, illegal dumping, pools of liquid, storage tanks, stained soil, odors, stressed vegetation, or materials containing PCB's were not observed on the subject property during the site visit.

Adjoining properties were observed during the site visit. The adjoining properties to the west, north, and east are undeveloped prairie used for seasonal cattle grazing. The Rawlins Landfill was observed along the southern border. Windblown solid waste was observed along the south fence line of the subject property; however, most of the site activity was far from the subject property. No environmental concerns were observed.

INTERIOR OBSERVATIONS

Interior observations were not applicable as no structures exist at the subject property.

INTERVIEWS

Listed below are people interviewed regarding their knowledge of the subject property and vicinity. During our interviews, it was described that the subject property is owned by the BLM. The property is accessed through the existing landfill and features a monitoring well that is part of the current Rawlins Landfill groundwater monitoring network. The groundwater table at the site is relatively shallow. No environmental concerns were known at the subject property. No concerns were known about the adjoining properties with the exception of a public comment in regards to a waste management issue at the Rawlins Landfill that the BLM had investigated. Copies of our telephone conversation records and interview documentation are included in Appendix C.

Person	Position	Period	Description of Interview
Danielle Gross	City of Rawlins Administrative Secretary	N/A	No environmental concerns are known at the subject property or the vicinity. Please refer to the User Provided Information section for more details.

Person	Position	Period	Description of Interview
Pat Martinez	City of Rawlins Landfill Foreman	Approximately 7 years with the City of Rawlins	The existing monitoring well on the subject property is currently monitored as part of the existing monitoring well network at the City of Rawlins Landfill. Site access is through the landfill and not aware of any unauthorized access. The site was used historically for cattle grazing; however, it hasn't been used for several years. Not aware of any environmental concerns at the subject property or in the vicinity.
Nile Layton	BLM- Physical Scientist/Hazmat Coordinator	Approximately 4 Years with the BLM	Observed the property during a site visit a while back. Not aware of any environmental concerns at the subject property or in the vicinity. Asked to contact Travis Bargsten for more historical information.
Travis Bargsten	BLM- Physical Scientist/Hazmat Coordinator	N/A	Not aware of any concerns on the subject property. Aware of a waste management issues at the Rawlins Landfill identified during the public comment period when the BLM was transferring BLM land to the City of Rawlins. Previously the Rawlins Landfill was leased to the City of Rawlins through a RPR Patent from the 1970's. Not aware of any other concerns in the vicinity.
Rebecca Dietrich	WDEQ-SHWD Solid Waste & Corrective Action Program	N/A	Based on monitoring well information in the area, the groundwater is relatively shallow. Not aware of any environmental concerns associated with hazardous substances or petroleum products at the subject property or in the vicinity.

DATA GAP ANALYSIS

The ASTM Practice E1527-13 requires a listing of data gaps encountered during the assessment process that may affect the conclusions of IME. The following is a list of identified data gaps as defined by ASTM:

- 1940 to 1946. Insignificant. Aerial photos show the subject property as native prairie with very little site access. It is likely the property was owned by the BLM and used seasonally for cattle grazing during this time.
- 1954 to 1975. Insignificant. Aerial photos and historical topos show the subject property as native prairie with some development of the Rawlins Landfill adjoining to the south. It is likely the property was owned by the BLM and used seasonally for cattle grazing during this time.
- 1975 to 1981. Insignificant. Aerial photos and historical topos show the subject property as native prairie. It is likely the property was owned by the BLM and used seasonally for cattle grazing during this time.
- 1975 to 1981. Insignificant. Aerial photos and historical topos show the subject property as native prairie. It is likely the property was owned by the BLM and used seasonally for cattle grazing during this time.
- 1981 to 1989. Insignificant. Aerial photos and historical topos show the subject property as native prairie. It is likely the property was owned by the BLM and used seasonally for cattle grazing during this time.

- 1994 to 2001. Insignificant. Aerial photos and historical topos show the subject property as native prairie. It is likely the property was owned by the BLM and used seasonally for cattle grazing during this time.

FINDINGS AND CONCLUSIONS

We have performed a Phase I ESA in conformance with the scope and limitations of ASTM Practice E1527-13 of the property located north of the City of Rawlins Landfill at 3001 Gun Club Road, Rawlins, Carbon County, Wyoming, Latitude N 41° 50' 12.84", Longitude W 107° 12' 3.24". Any exceptions to, or deletions from this practice are described in the scope of services and limitations, deviations, and assumptions sections of this report.

In conformance with ASTM E1527-13, we provide our professional opinion of the presence of potential RECs in connection with the subject property and determine if any potential RECs would qualify as historical recognized environmental conditions (HRECs), controlled recognized environmental conditions (CRECs), or de minimis conditions.

This assessment did not reveal any RECs in connection with the property. Our assessment did identify the following potential concerns that, in our opinion, do not qualify as RECs but should be considered in the overall evaluation of the property.

- During the Phase I ESA site reconnaissance, scattered solid waste blown in from the City of Rawlins Landfill consisting of plastic bags, plastic sheeting, plastic containers, aluminum cans, and cardboard was observed in the southeast portion of the subject property. We consider the scattered solid waste a de minimis condition as it is unlikely the windblown solid waste would be a regulatory concern because of the small quantity.

Based on the information reviewed, no further assessment action is recommended at this time.

QUALIFICATIONS OF THE ENVIRONMENTAL PROFESSIONAL

Environmental staff from IME's Casper, Wyoming office was responsible for conducting this Phase I ESA. I have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property.

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. Project instruction, report review, and supervision were provided by Eric Graney, P.G., Environmental Professional. Eric Nunn, E.I.T., performed site reconnaissance, interviews with appropriate local agencies and community members, procured regulatory records from EDR, and was responsible for report preparation.

A resume of each of the environmental staff involved in this site assessment is provided in Appendix D.

CLOSURE

The purpose of this Phase I ESA was to review existing information, conduct interviews, and perform a site reconnaissance in order to evaluate the presence of RECs at the subject property.

This report has been prepared for the exclusive use of our client, the City of Rawlins. As requested, reliance has further been extended to the BLM. It may contain insufficient information for applications other than is herein described.

We appreciate the opportunity to provide these services. We can offer additional services to perform additional site assessment or engineering services, as requested. If there are any questions with the contents of this report, please do not hesitate to call us at 307-577-0806.

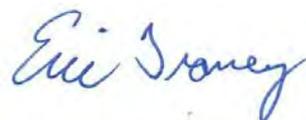
Sincerely,

INBERG-MILLER ENGINEERS



W. Eric Nunn, E.I.T.
Environmental Engineer

REVIEWED BY

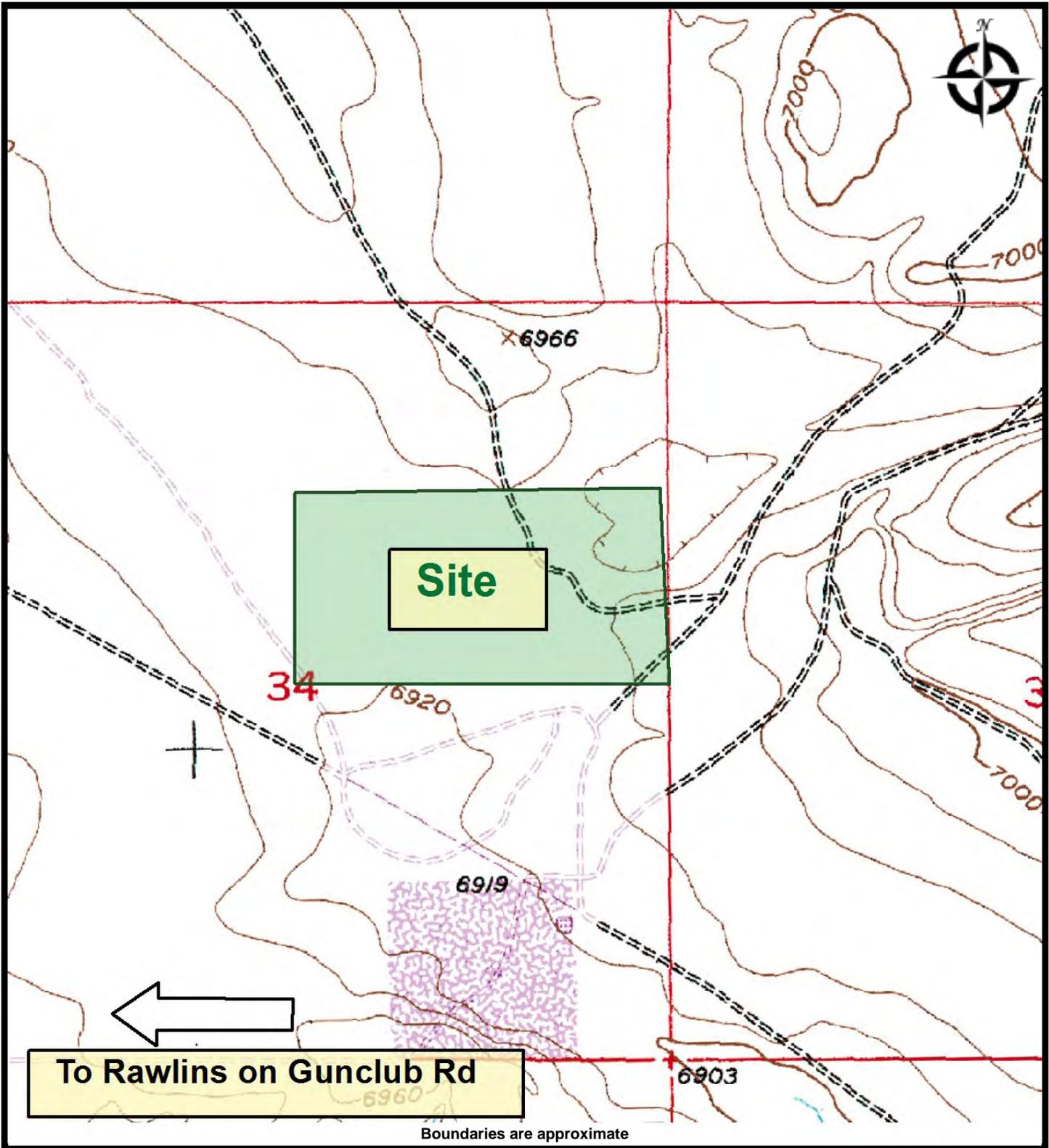


Eric T. Graney, P.G.
Senior Vice President

WEN:ETG:cno\\lme01\17663-HW CITY OF RAWLINS Rawlins Landfill ESA\Phase 1 ESA\17663-HW ESA Rpt

REFERENCES CITED

- American Society for Testing Materials. *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, E1527-13*. West Conshohocken, PA: ASTM International, 2013. Print.
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- . *Historical Topographic Map Report*. Milford, CT, 17 September 2014. PDF.
- . *Radius Map Report/Executive Summary*. Milford, CT, 10 June 2014. PDF.
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- . *Site Report*. Milford, CT: 2014, 1 October 2014. PDF.
- Gross, Danielle. *Administrative Secretary- City of Rawlins Eric Nunn*. 15 September 2014. Questionnaire.
- Layton, Nile. *Physical Scientist / Hazmat Coordinator-BLM Eric Nunn*. 1 October 2014. Interview.
- Martinez, Pat. *Landfill Foreman-City of Rawlins Eric Nunn*. 25 September 2014. Interview.
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Boundaries are approximate



SITE LOCATION MAP
LANDFILL EXPANSION ESA
3001 Gunclub Road
Rawlins Wyoming 82301

PREPARED FOR: City of Rawlins
PROJ. MGR: Eric Nunn
DRAWN BY: Eric Nunn

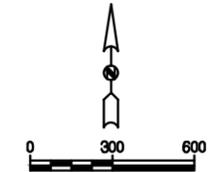
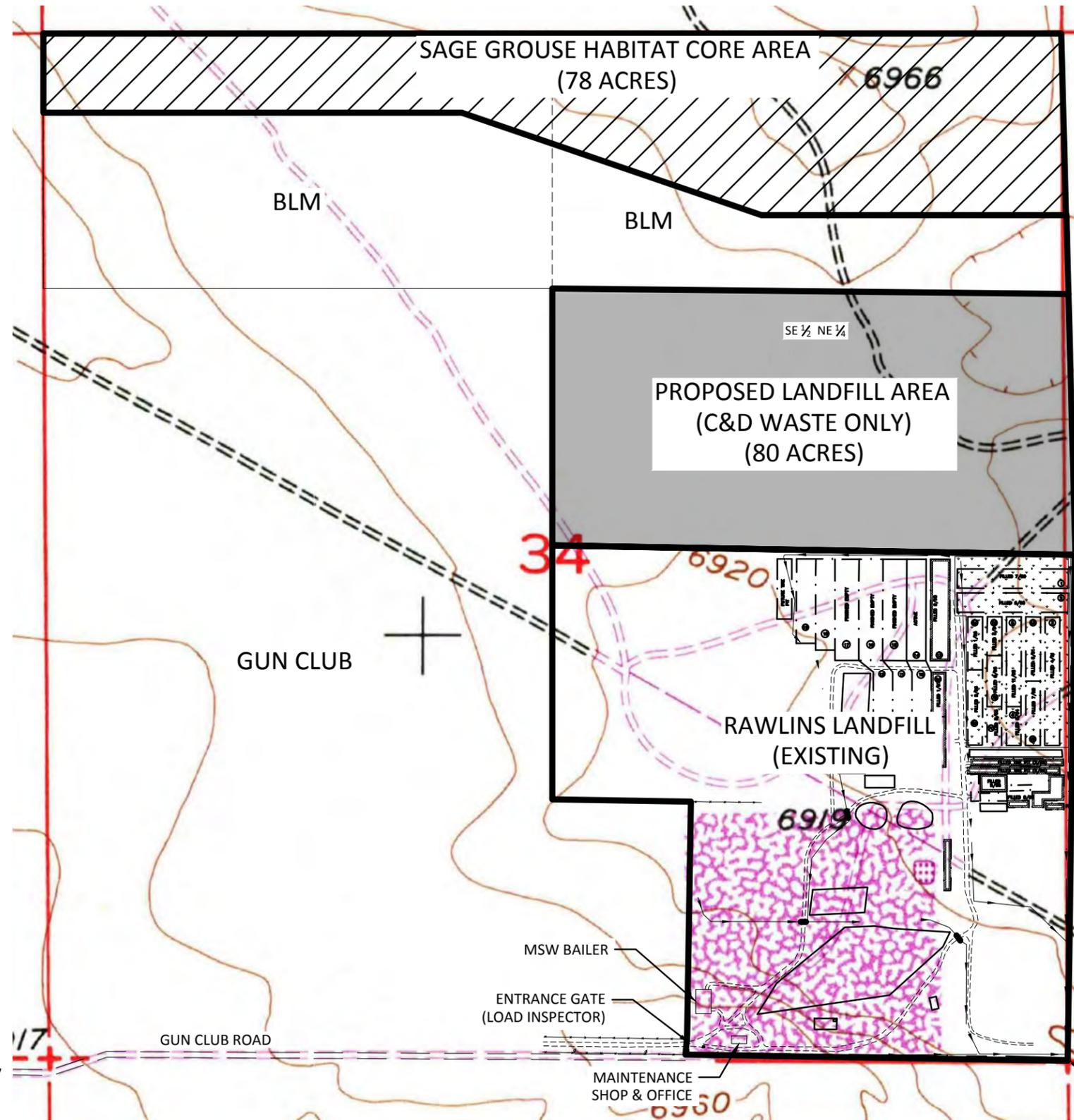
DATE: 10/1/2014
PROJ. #: 17663-HW

Site Map



Source: City of Rawlins Scanned Aerial Image

T 22 N, R 87 W



LEGEND

- GRAVEL ACCESS ROAD
- ×—× FENCE
- BUILDING
- ⊙ POWER POLE
- △ 6902.55 GROUND CONTROL
- DRAINAGE FLOW LINE
- INACTIVE TRENCHES
- ACTIVE TRENCHES
- ▨ INTERMEDIATE COVER
- ▤ AREA RECLAIMED & SEEDED
- MW-9 ● MONITOR WELL

SITE PLAN
1" = 200'

JOB NO. 704205		DRAWN BY: CK		DATE: 8/8/2018		PMPC CIVIL ENGINEERS 118 E. BRIDGE AVE. P. O. BOX 370 SARATOGA, WYOMING 82331 307-326-8301	SITE PLAN - PROPOSED LANDFILL AREA TYPE I LANDFILL PERMITTING CITY OF RAWLINS, WYOMING	SHEET 1 OF 6
FILE NAME: SITEPLANDWG		CHECKED BY:		DATE:				
SCALE: 1" = 300'		APPROVED BY:		DATE:				
REV	DATE	BY	DESCRIPTION	REV	DATE	BY	DESCRIPTION	
1								

Site Photographs



Figure 1: Looking east across the subject property from the northwest corner



Figure 4: Looking west across the subject property from the middle north property boundary



Figure 2: Looking south across the subject property from the middle north property boundary



Figure 5: Looking southeast across the subject property from the middle north property boundary



Figure 3: Looking southeast across the subject property from the middle north property boundary



Figure 6: Looking east across the northeast portion of the subject property from the north property boundary

Site Photographs



Figure 7: Looking west across the subject property from the north property boundary



Figure 10: Looking north along the east property boundary from the middle east property boundary



Figure 8: Looking west across the subject property from the northeast corner, low lying runoff area



Figure 11: Looking southwest towards the Rawlins Landfill from the middle east property boundary



Figure 9: Looking south across the subject property from the northeast corner, low lying runoff area



Figure 12: Looking south towards the southeast corner from the middle east property boundary

Site Photographs



Figure 13: Looking east along the BLM access road in the southeast portion of the subject property



Figure 16: Looking southwest at a monitoring well on the subject property near the south boundary



Figure 14: Looking west along the south property boundary from the southeast corner of the property



Figure 17: Looking along the south boundary of the subject property at cardboard, cans, and plastic blown in from the Rawlins Landfill



Figure 15: Looking southeast along an access road on the subject property boundary from the southeast portion of the property



Figure 18: Looking north at a survey benchmark near the south property boundary

Site Photographs



Figure 19: Looking west across the subject property from the middle south property boundary



Figure 22: Looking east across the subject property from the middle south property boundary



Figure 20: Looking northwest across the subject property from the middle south property boundary



Figure 23: Looking south across the subject property from the southwest portion of the subject property



Figure 21: Looking north across the subject property from the middle south property boundary



Figure 24: Looking east at the sand dune area in the west portion of the subject property

Site Photographs



Figure 25: Looking east across the subject property from the center



Figure 28: Looking northwest across the subject property from the center



Figure 26: Looking southeast across the subject property from the center



Figure 29: Looking north along the west property boundary from the southwest corner



Figure 27: Looking south across the subject property from the center



Figure 30: Looking east along the south property boundary from the southwest corner

Site Photographs



Figure 31: Looking east across the subject property from the middle west boundary



Figure 34: Northwest corner of the subject property (C-N 1/16 Sec 34, T22N, R 37W)



Figure 32: Looking northwest across the subject property from the middle west boundary



Figure 35: Northeast corner of the subject property (N 1/16 Sec 34 | Sec 35, T22N, R 37W)



Figure 33: Looking southeast across the subject property from the middle west boundary



Figure 36: Southeast corner of the subject property (E 1/4 Sec 34 | Sec 35, T22N, R 37W)

Site Photographs



Figure 37: Southwest corner of the subject property (Center Sec 34, T22N, R 37W)



Figure 40: Looking north at the adjoining BLM land access road to the north from the north property boundary



Figure 38: Looking south at the adjoining pasture to the west from the northwest corner of the property



Figure 41: Looking east at the adjoining BLM land from the middle east property boundary



Figure 39: Looking north at the adjoining BLM land to the north from the middle north property boundary



Figure 42: Looking southwest at the adjoining Rawlins Landfill from the southeast corner of the subject property

Site Photographs



Figure 43: Looking south at the Rawlins landfill from the middle south boundary of the subject property



Figure 46: Looking southwest at the adjoining pasture to the west from the southwest corner of the subject property



Figure 44: Looking south at the Rawlins landfill from the southeast corner of the subject property



Figure 45: Looking northwest at the adjoining pasture to the west from the southwest corner of the subject property

**INBERG-MILLER ENGINEERS
SITE RECONNAISSANCE NOTES
PHASE I ENVIRONMENTAL SITE ASSESSMENT**

Client: City of Rawlins
Project: Rawlins Landfill Expansion ESA Job No.: 17633-HW
Date: 9/17/14 Recorded By: Eric Nunn

Guidance: The objective is to obtain information indicating the likelihood of identifying a Recognized Environmental Condition (REC). Physically observe all property boundaries. Observe the property from all public roads and right of ways. Special considerations: Dry Cleaning Operations, Car Hoists, Oil Water Separators, Parts Washers, Used Oil Tanks, Fence Post Treatment, Heating Oil Tanks, Cattle Dipping Vats, Loading Docks, Patches in Concrete or Asphalt. Observations including asbestos, lead-based paint, radon, industrial hygiene, regulatory compliance and mold are non-scope items and are required if stated in the client contract or if observations indicate a release into the environment. Make note of anything that was not observed.

GENERAL SITE SETTING

1. Current Site Use: Undeveloped Pasture, Cattle Grazing based on cattle manure
2. Past Site Use: Same with some two track property access roads on the east portion of the subject property. Most likely for moving cattle to northern parcels.
3. Current Adjoining Site Use: Rawlins Landfill to the south, Rawlins Shooting range to the southwest, undeveloped pasture to the north, west, and east
4. Past Adjoining Site Use: Undeveloped land
5. Current or Past Use of Surrounding Area: Pasture and undeveloped BLM land
6. Geologic, Surface Water, Drainage and Topographic Conditions: Fine Sandy Top soil with sagebrush and sparse grass vegetation, drains to the northeast corner following local site drainage ravines
7. Surrounding Roads: No paved roads to the site, two-track access road in the southeast corner, Gun club road south of the Rawlins Landfill, Highway 287 connects with Gun club road to the west.
8. Number, Age, and Accessibility of Structures: None
9. Source of Potable Water: None
10. Sewage Disposal System: None

INTERIOR AND EXTERIOR OBSERVATIONS

- 1. Current Use of the Structures: None
- 2. Past Use of the Structures : None
- 3. Hazardous Substance/Petroleum Product Uses: None
- 4. Storage Tanks (vent and fill pipes, content, capacity, age): None
- 5. Odors (includes vapors): None
- 6. Pools of Liquid: None
- 7. Drums (capacity, number, condition): None
- 8. Hazardous Substance/Petroleum Product Containers (capacity, number, condition): None
- 9. Open Unidentified Substance (container, storage Condition): None
- 10. PCB Occurrence (leaking transformers, hydraulic fluid, 1950's caulking): None

INTERIOR OBSERVATIONS

- 1. Heating and Cooling (fuel source): None
- 2. Stains or Corrosion: None
- 3. Pools of Liquid: None
- 4. Drains and Sumps (size, discharge, material collected): None

EXTERIOR OBSERVATIONS

- 1. Pits, Ponds, Lagoons: The northeast corner of the property collects drainage from the majority of the property and has very little vegetation due to the saturated conditions of alkaline water and cattle activity
- 2. Stained Soil or Pavement: None
- 3. Stressed Vegetation: Only related with poor soil and little precipitation
- 4. Solid Waste Occurrence (or cond. suggesting solid waste disposal): No signs of dumping activities, some solid waste (cans, plastic, cardboard) blown in from landfill
- 5. Waste Water Discharges: None

APPENDIX B

Rawlins Landfill Expansion

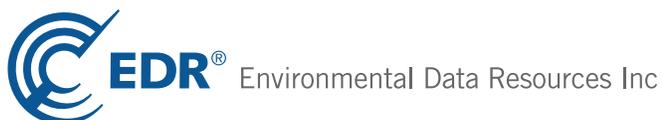
3001 Gunclub Road

Rawlins, WY 82301

Inquiry Number: 4067782.2s

September 17, 2014

The EDR Radius Map™ Report with GeoCheck®



6 Armstrong Road, 4th floor
Shelton, CT 06484
Toll Free: 800.352.0050
www.edrnet.com

TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
Executive Summary	ES1
Overview Map	2
Detail Map	3
Map Findings Summary	4
Map Findings	7
Orphan Summary	8
Zip Scan Report	ZIP-1
Government Records Searched/Data Currency Tracking	GR-1
 <u>GEOCHECK ADDENDUM</u>	
Physical Setting Source Addendum	A-1
Physical Setting Source Summary	A-2
Physical Setting Source Map	A-8
Physical Setting Source Map Findings	A-9
Physical Setting Source Records Searched	PSGR-1

Thank you for your business.
 Please contact EDR at 1-800-352-0050
 with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-13) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

3001 GUNCLUB ROAD
RAWLINS, WY 82301

COORDINATES

Latitude (North): 41.8369000 - 41° 50' 12.84"
Longitude (West): 107.2009000 - 107° 12' 3.24"
Universal Transverse Mercator: Zone 13
UTM X (Meters): 317251.9
UTM Y (Meters): 4633796.0
Elevation: 6939 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 41107-G2 RAWLINS, WY
Most Recent Revision: 1981

AERIAL PHOTOGRAPHY IN THIS REPORT

Portions of Photo from: 20120711
Source: USDA

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL..... National Priority List

EXECUTIVE SUMMARY

Proposed NPL..... Proposed National Priority List Sites
NPL LIENS..... Federal Superfund Liens

Federal Delisted NPL site list

Delisted NPL..... National Priority List Deletions

Federal CERCLIS list

CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System
FEDERAL FACILITY..... Federal Facility Site Information listing

Federal CERCLIS NFRAP site List

CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

Federal RCRA CORRACTS facilities list

CORRACTS..... Corrective Action Report

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

Federal RCRA generators list

RCRA-LQG..... RCRA - Large Quantity Generators
RCRA-SQG..... RCRA - Small Quantity Generators
RCRA-CESQG..... RCRA - Conditionally Exempt Small Quantity Generator

Federal institutional controls / engineering controls registries

US ENG CONTROLS..... Engineering Controls Sites List
US INST CONTROL..... Sites with Institutional Controls
LUCIS..... Land Use Control Information System

Federal ERNS list

ERNS..... Emergency Response Notification System

State- and tribal - equivalent CERCLIS

SHWS..... This state does not maintain a SHWS list. See the Federal CERCLIS list and Federal NPL list.

State and tribal landfill and/or solid waste disposal site lists

SWF/LF..... Solid Waste Facility Database
SHWF..... Solid & Hazardous Waste Facility Database

State and tribal leaking storage tank lists

LTANKS..... Known Contaminated Sites
INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

State and tribal registered storage tank lists

TANKS..... Storage Tank Listing

EXECUTIVE SUMMARY

UST..... Underground Storage Tanks
AST..... Wyoming Aboveground Storage Tanks
INDIAN UST..... Underground Storage Tanks on Indian Land
FEMA UST..... Underground Storage Tank Listing

State and tribal institutional control / engineering control registries

ENG CONTROLS..... Engineering Controls Site Listing
INST CONTROL..... Sites with Institutional Controls

State and tribal voluntary cleanup sites

VCP..... List of Voluntary Remediation Program Sites
INDIAN VCP..... Voluntary Cleanup Priority Listing

State and tribal Brownfields sites

BROWNFIELDS..... Brownfields Sites Listing

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS..... A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

ODI..... Open Dump Inventory
DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations
SWRCY..... Recycling Facilities
INDIAN ODI..... Report on the Status of Open Dumps on Indian Lands

Local Lists of Hazardous waste / Contaminated Sites

US CDL..... Clandestine Drug Labs
CDL..... Clandestine Drug Lab Site Locations
US HIST CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System
SPILLS..... SPILL Database

Other Ascertainable Records

RCRA NonGen / NLR..... RCRA - Non Generators / No Longer Regulated
DOT OPS..... Incident and Accident Data
DOD..... Department of Defense Sites
FUDS..... Formerly Used Defense Sites
CONSENT..... Superfund (CERCLA) Consent Decrees

EXECUTIVE SUMMARY

ROD.....	Records Of Decision
UMTRA.....	Uranium Mill Tailings Sites
US MINES.....	Mines Master Index File
TRIS.....	Toxic Chemical Release Inventory System
TSCA.....	Toxic Substances Control Act
FTTS.....	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
HIST FTTS.....	FIFRA/TSCA Tracking System Administrative Case Listing
SSTS.....	Section 7 Tracking Systems
ICIS.....	Integrated Compliance Information System
PADS.....	PCB Activity Database System
MLTS.....	Material Licensing Tracking System
RADINFO.....	Radiation Information Database
FINDS.....	Facility Index System/Facility Registry System
RAATS.....	RCRA Administrative Action Tracking System
RMP.....	Risk Management Plans
UIC.....	UIC Well Locations List
INDIAN RESERV.....	Indian Reservations
SCRD DRYCLEANERS.....	State Coalition for Remediation of Drycleaners Listing
Financial Assurance.....	Financial Assurance Information listing
2020 COR ACTION.....	2020 Corrective Action Program List
MINES.....	Mine Locations Listing
LEAD SMELTERS.....	Lead Smelter Sites
PRP.....	Potentially Responsible Parties
US AIRS.....	Aerometric Information Retrieval System Facility Subsystem
US FIN ASSUR.....	Financial Assurance Information
COAL ASH DOE.....	Steam-Electric Plant Operation Data
PCB TRANSFORMER.....	PCB Transformer Registration Database
COAL ASH EPA.....	Coal Combustion Residues Surface Impoundments List
EPA WATCH LIST.....	EPA WATCH LIST

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP.....	EDR Proprietary Manufactured Gas Plants
EDR US Hist Auto Stat.....	EDR Exclusive Historic Gas Stations
EDR US Hist Cleaners.....	EDR Exclusive Historic Dry Cleaners

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA LF.....	Recovered Government Archive Solid Waste Facilities List
RGA LUST.....	Recovered Government Archive Leaking Underground Storage Tank

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were not identified.

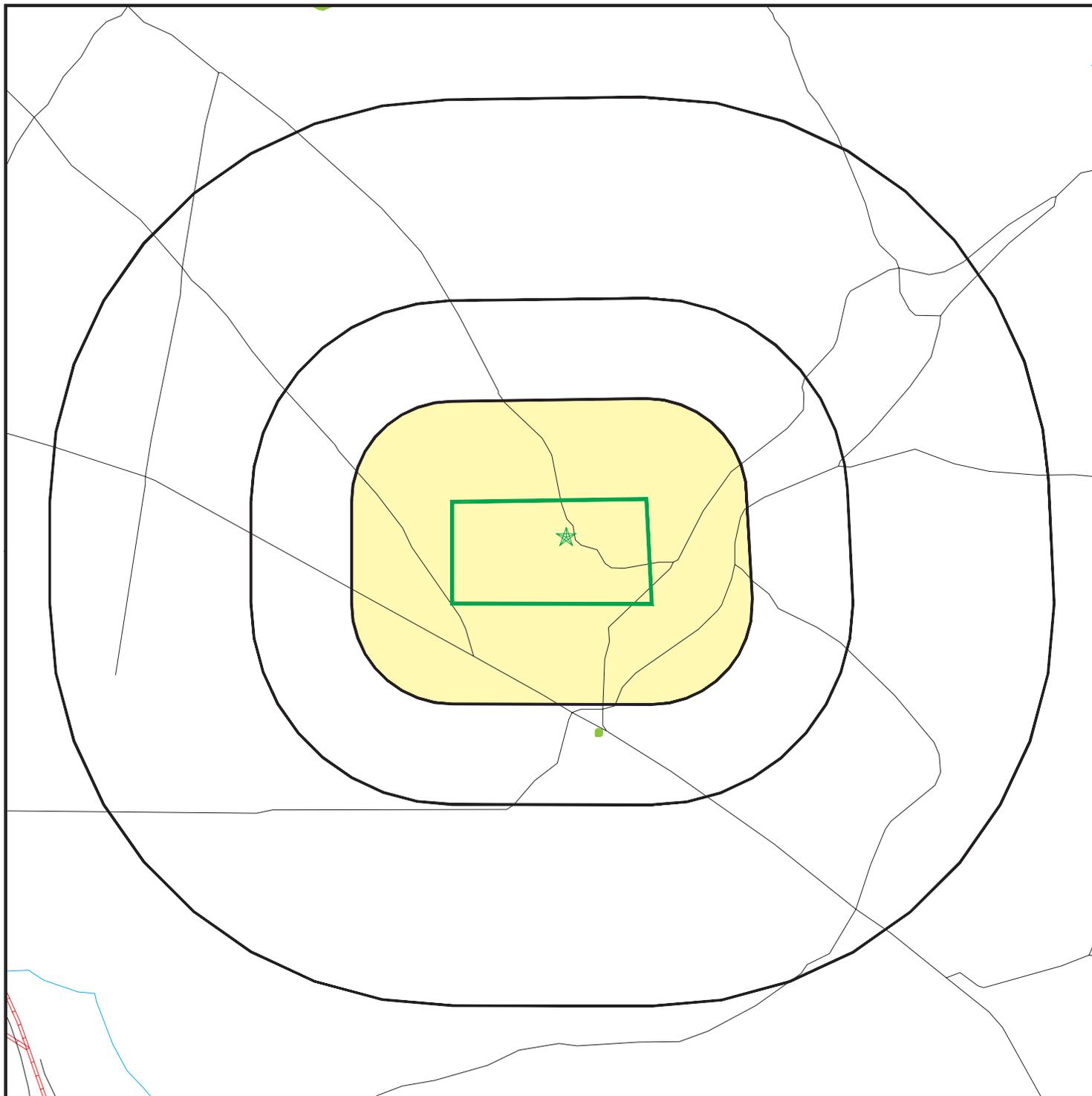
Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped. Count: 20 records.

<u>Site Name</u>	<u>Database(s)</u>
BAGGS JUNCTION SERVICE	TANKS
DICK'S STANDARD SERVICE	LTANKS, TANKS, UST, Financial Assurance
WY DEPARTMENT OF TRANSPORTATION	TANKS, UST, Financial Assurance
SOUTHERN STAR CENTRAL GAS PIPELINE	SHWF
NATURAL GAS PIPELINE CO. STATION 5	SHWF
MONSANTO COMPANY	SHWF
STEWART & STEVENSON SERVICES	SHWF
HAYSTACKS	SHWF
WYDOT - MUDDY GAP	SHWF
SOUTHERN STAR CENTRAL GAS PIPELINE	SHWF
BAGGS JUNCTION SERVICE	AST
MONSANTO COMPANY#	RCRA NonGen / NLR
DEPARTMENT OF TRANSPORTATION MUDDY	RCRA NonGen / NLR
GO SOLARIS INC	RCRA NonGen / NLR, FINDS
AT&T NORTH RAWLINS	RCRA NonGen / NLR
SOUTHERN STAR CENTRAL GAS PIPELINE	RCRA-CESQG
NATURAL GAS PIPELINE CO. STATION 5	RCRA-CESQG
STEWART & STEVENSON SERVICES	RCRA-CESQG, FINDS
RAWLINS LANDFILL	FINDS
RAWLINS CITY OF	MLTS

OVERVIEW MAP - 4067782.2S



-  Target Property
-  Sites at elevations higher than or equal to the target property
-  Sites at elevations lower than the target property
-  Manufactured Gas Plants
-  National Priority List Sites
-  Dept. Defense Sites



-  Indian Reservations BIA
-  Oil & Gas pipelines from USGS
-  National Wetland Inventory

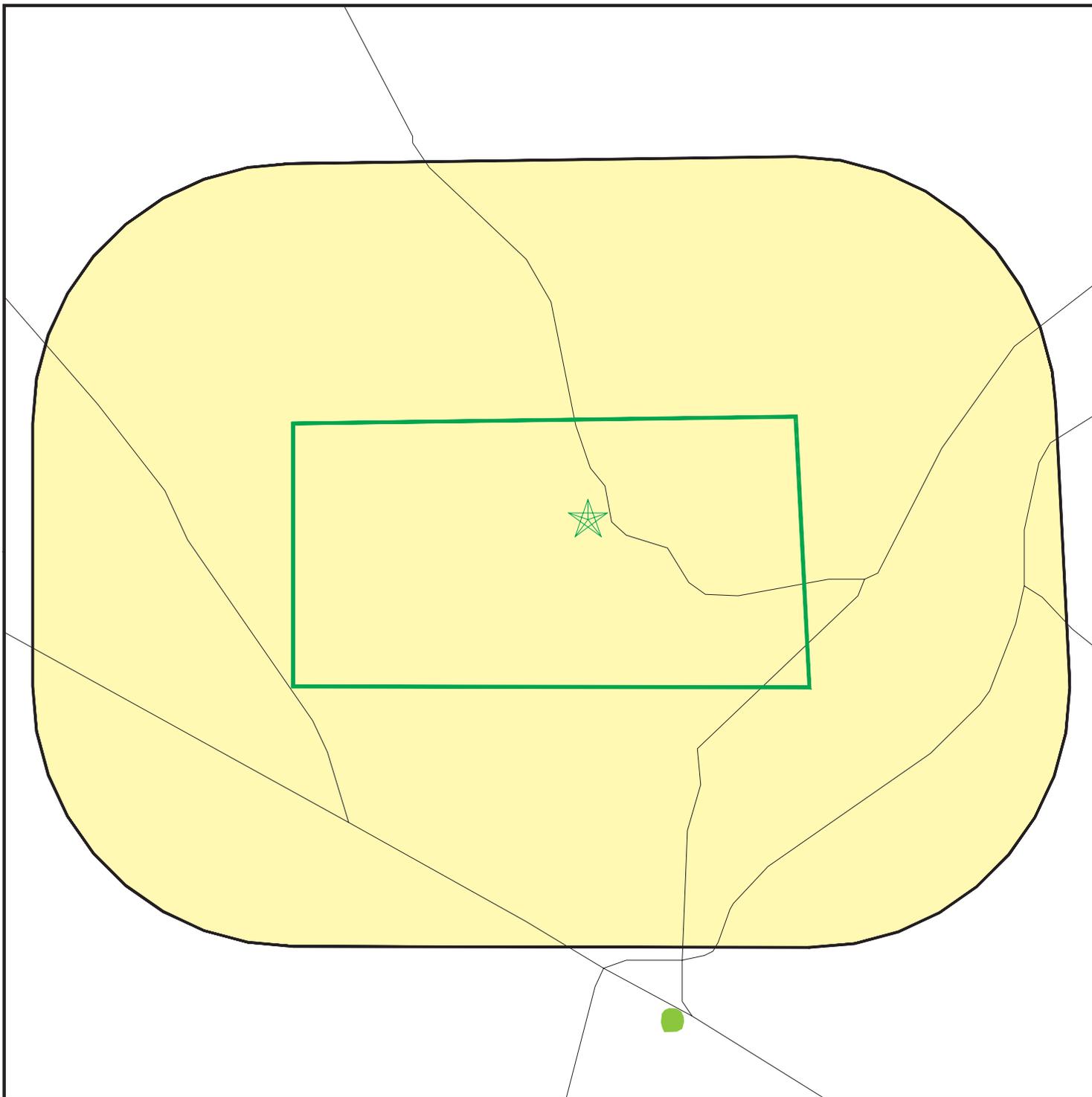


This report includes Interactive Map Layers to display and/or hide map information. The legend includes only those icons for the default map view.

SITE NAME: Rawlins Landfill Expansion
 ADDRESS: 3001 Gunclub Road
 Rawlins WY 82301
 LAT/LONG: 41.8369 / 107.2009

CLIENT: Inberg-Miller Engineers
 CONTACT: Eric Nunn
 INQUIRY #: 4067782.2s
 DATE: September 17, 2014 10:22 am

DETAIL MAP - 4067782.2S



-  Target Property
-  Sites at elevations higher than or equal to the target property
-  Sites at elevations lower than the target property
-  Manufactured Gas Plants
-  Sensitive Receptors
-  National Priority List Sites
-  Dept. Defense Sites

-  Indian Reservations BIA
-  Oil & Gas pipelines from USGS
-  National Wetland Inventory

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SITE NAME: Rawlins Landfill Expansion
 ADDRESS: 3001 Gunclub Road
 Rawlins WY 82301
 LAT/LONG: 41.8369 / 107.2009

CLIENT: Inberg-Miller Engineers
 CONTACT: Eric Nunn
 INQUIRY #: 4067782.2s
 DATE: September 17, 2014 10:23 am

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
STANDARD ENVIRONMENTAL RECORDS								
<i>Federal NPL site list</i>								
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
NPL LIENS	TP		NR	NR	NR	NR	NR	0
<i>Federal Delisted NPL site list</i>								
Delisted NPL	1.000		0	0	0	0	NR	0
<i>Federal CERCLIS list</i>								
CERCLIS	0.500		0	0	0	NR	NR	0
FEDERAL FACILITY	0.500		0	0	0	NR	NR	0
<i>Federal CERCLIS NFRAP site List</i>								
CERC-NFRAP	0.500		0	0	0	NR	NR	0
<i>Federal RCRA CORRACTS facilities list</i>								
CORRACTS	1.000		0	0	0	0	NR	0
<i>Federal RCRA non-CORRACTS TSD facilities list</i>								
RCRA-TSDF	0.500		0	0	0	NR	NR	0
<i>Federal RCRA generators list</i>								
RCRA-LQG	0.250		0	0	NR	NR	NR	0
RCRA-SQG	0.250		0	0	NR	NR	NR	0
RCRA-CESQG	0.250		0	0	NR	NR	NR	0
<i>Federal institutional controls / engineering controls registries</i>								
US ENG CONTROLS	0.500		0	0	0	NR	NR	0
US INST CONTROL	0.500		0	0	0	NR	NR	0
LUCIS	0.500		0	0	0	NR	NR	0
<i>Federal ERNS list</i>								
ERNS	TP		NR	NR	NR	NR	NR	0
<i>State- and tribal - equivalent CERCLIS</i>								
SHWS	N/A		N/A	N/A	N/A	N/A	N/A	N/A
<i>State and tribal landfill and/or solid waste disposal site lists</i>								
SWF/LF	0.500		0	0	0	NR	NR	0
SHWF	0.500		0	0	0	NR	NR	0
<i>State and tribal leaking storage tank lists</i>								
LTANKS	0.500		0	0	0	NR	NR	0
INDIAN LUST	0.500		0	0	0	NR	NR	0
<i>State and tribal registered storage tank lists</i>								
TANKS	0.250		0	0	NR	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
UST	0.250		0	0	NR	NR	NR	0
AST	0.250		0	0	NR	NR	NR	0
INDIAN UST	0.250		0	0	NR	NR	NR	0
FEMA UST	0.250		0	0	NR	NR	NR	0
State and tribal institutional control / engineering control registries								
ENG CONTROLS	0.500		0	0	0	NR	NR	0
INST CONTROL	0.500		0	0	0	NR	NR	0
State and tribal voluntary cleanup sites								
VCP	0.500		0	0	0	NR	NR	0
INDIAN VCP	0.500		0	0	0	NR	NR	0
State and tribal Brownfields sites								
BROWNFIELDS	0.500		0	0	0	NR	NR	0
ADDITIONAL ENVIRONMENTAL RECORDS								
Local Brownfield lists								
US BROWNFIELDS	0.500		0	0	0	NR	NR	0
Local Lists of Landfill / Solid Waste Disposal Sites								
ODI	0.500		0	0	0	NR	NR	0
DEBRIS REGION 9	0.500		0	0	0	NR	NR	0
SWRCY	0.500		0	0	0	NR	NR	0
INDIAN ODI	0.500		0	0	0	NR	NR	0
Local Lists of Hazardous waste / Contaminated Sites								
US CDL	TP		NR	NR	NR	NR	NR	0
CDL	TP		NR	NR	NR	NR	NR	0
US HIST CDL	TP		NR	NR	NR	NR	NR	0
Local Land Records								
LIENS 2	TP		NR	NR	NR	NR	NR	0
Records of Emergency Release Reports								
HMIRS	TP		NR	NR	NR	NR	NR	0
SPILLS	TP		NR	NR	NR	NR	NR	0
Other Ascertainable Records								
RCRA NonGen / NLR	0.250		0	0	NR	NR	NR	0
DOT OPS	TP		NR	NR	NR	NR	NR	0
DOD	1.000		0	0	0	0	NR	0
FUDS	1.000		0	0	0	0	NR	0
CONSENT	1.000		0	0	0	0	NR	0
ROD	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0

MAP FINDINGS SUMMARY

Database	Search Distance (Miles)	Target Property	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
US MINES	0.250		0	0	NR	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
HIST FTTS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0
ICIS	TP		NR	NR	NR	NR	NR	0
PADS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
RADINFO	TP		NR	NR	NR	NR	NR	0
FINDS	TP		NR	NR	NR	NR	NR	0
RAATS	TP		NR	NR	NR	NR	NR	0
RMP	TP		NR	NR	NR	NR	NR	0
UIC	TP		NR	NR	NR	NR	NR	0
INDIAN RESERV	1.000		0	0	0	0	NR	0
SCRD DRYCLEANERS	0.500		0	0	0	NR	NR	0
Financial Assurance	TP		NR	NR	NR	NR	NR	0
2020 COR ACTION	0.250		0	0	NR	NR	NR	0
MINES	0.250		0	0	NR	NR	NR	0
LEAD SMELTERS	TP		NR	NR	NR	NR	NR	0
PRP	TP		NR	NR	NR	NR	NR	0
US AIRS	TP		NR	NR	NR	NR	NR	0
US FIN ASSUR	TP		NR	NR	NR	NR	NR	0
COAL ASH DOE	TP		NR	NR	NR	NR	NR	0
PCB TRANSFORMER	TP		NR	NR	NR	NR	NR	0
COAL ASH EPA	0.500		0	0	0	NR	NR	0
EPA WATCH LIST	TP		NR	NR	NR	NR	NR	0

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP	1.000		0	0	0	0	NR	0
EDR US Hist Auto Stat	0.250		0	0	NR	NR	NR	0
EDR US Hist Cleaners	0.250		0	0	NR	NR	NR	0

EDR RECOVERED GOVERNMENT ARCHIVES

Exclusive Recovered Govt. Archives

RGA LF	TP		NR	NR	NR	NR	NR	0
RGA LUST	TP		NR	NR	NR	NR	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

N/A = This State does not maintain a SHWS list. See the Federal CERCLIS list.

Count: 20 records.

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
ARLINGTON	S110610207	SOUTHERN STAR CENTRAL GAS PIPELINE	CRAIG STAR ROUTE	82301	SHWF
ARLINGTON	1001969922	SOUTHERN STAR CENTRAL GAS PIPELINE	CRAIG STAR ROUTE	82301	RCRA-CESQG
LAMONT	S108324408	NATURAL GAS PIPELINE CO. STATION 5	4 MILES N OF LAMONT ON HIGHWAY	82301	SHWF
LAMONT	1004804775	NATURAL GAS PIPELINE CO. STATION 5	4 MI. N. OF LAMONT ON HWY 287	82301	RCRA-CESQG
RAWLINS	S108324365	MONSANTO COMPANY	HIGHWAY 130	82301	SHWF
RAWLINS	1000376903	MONSANTO COMPANY#	HWY 130	82301	RCRA NonGen / NLR
RAWLINS	S108324683	STEWART & STEVENSON SERVICES	1607 HIGHWAY 287 BYPASS	82301	SHWF
RAWLINS	1004804858	STEWART & STEVENSON SERVICES	1067 HWY 287 BYPASS	82301	RCRA-CESQG, FINDS
RAWLINS	S112336603	HAYSTACKS	121 HWY 76	82301	SHWF
RAWLINS	S110127906	BAGGS JUNCTION SERVICE	BAGGS JUNCTION INTERCHANGE BAGG		TANKS
RAWLINS	A100168781	BAGGS JUNCTION SERVICE	BAGGS JUNCTION INTERCHANGE BAG	82301	AST
RAWLINS	1001210207	RAWLINS CITY OF	P.O. BOX 953	82301	MLTS
RAWLINS	S110358575	WYDOT - MUDDY GAP	4347 US HIGHWAY 287	82301	SHWF
RAWLINS	1012190485	DEPARTMENT OF TRANSPORTATION MUDDY	4347 U.S. HIGHWAY 287	82301	RCRA NonGen / NLR
RAWLINS	1006812413	GO SOLARIS INC	1001 E. HIGHWAY 76	82301	RCRA NonGen / NLR, FINDS
RAWLINS	U003428648	DICK'S STANDARD SERVICE	LANDER STAR ROUTE	82301	LTANKS, TANKS, UST, Financial Assurance
RAWLINS	1000393187	AT&T NORTH RAWLINS	5.5 MILES NW OF	82301	RCRA NonGen / NLR
RAWLINS	U003547001	WY DEPARTMENT OF TRANSPORTATION	MUDDY GAP RAWLINS- CASPER ROUT	82301	TANKS, UST, Financial Assurance
RAWLINS	1016061836	RAWLINS LANDFILL	3/4 N. OF RAWLINS, HIGHWAY 287	82301	FINDS
RINER	S110610206	SOUTHERN STAR CENTRAL GAS PIPELINE	CRAIG STAR ROUTE	82301	SHWF

RAWLINS LANDFILL

3/4 N. OF RAWLINS, HIGHWAY 287
RAWLINS, WY 82301

Inquiry Number:
October 1, 2014

EDR Site Report™

TABLE OF CONTENTS

The EDR-Site Report™ is a comprehensive presentation of government filings on a facility identified in a search of federal, state and local environmental databases. The report is divided into three sections:

Section 1: Facility Summary Page 3

Summary of facility filings including a review of the following areas: waste management, waste disposal, multi-media issues, and Superfund liability.

Section 2: Facility Detail Reports Page 4

All available detailed information from databases where sites are identified.

Section 3: Databases and Update Information. Page 6

Name, source, update dates, contact phone number and description of each of the databases for this report.

Thank you for your business.
Please contact EDR at 1-800-352-0050
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SECTION 1: FACILITY SUMMARY

FACILITY	FACILITY 1
AREA	RAWLINS LANDFILL 3/4 N. OF RAWLINS, HIGHWAY 287 RAWLINS, WY 82301 EDR ID #1016061836 EPA #110013949950
WASTE MANAGEMENT Facility generates hazardous waste (RCRA)	NO
Facility treats, stores, or disposes of hazardous waste on-site (RCRA/TSD)	NO
Facility has received Notices of Violations (RCRA/VIOL)	NO
Facility has been subject to RCRA administrative actions (RAATS)	NO
Facility has been subject to corrective actions (CORRACTS)	NO
Facility handles PCBs (PADS)	NO
Facility uses radioactive materials (MLTS)	NO
Facility manages registered aboveground storage tanks (AST)	NO
Facility manages registered underground storage tanks (UST)	NO
Facility has reported leaking underground storage tank incidents (LUST)	NO
Facility has reported emergency releases to the soil (ERNS)	NO
Facility has reported hazardous material incidents to DOT (HMIRS)	NO
WASTE DISPOSAL Facility is a Superfund Site (NPL)	NO
Facility has a known or suspect abandoned, inactive or uncontrolled hazardous waste site (CERCLIS)	NO
Facility has a reported Superfund Lien on it (LIENS)	NO
Facility is listed as a state hazardous waste site (SHWS)	NO
Facility has disposed of solid waste on-site (SWF/LF)	NO
MULTIMEDIA Facility uses toxic chemicals and has notified EPA under SARA Title III, Section 313 (TRIS)	NO
Facility produces pesticides and has notified EPA under Section 7 of FIFRA (SSTS)	NO
Facility manufactures or imports toxic chemicals on the TSCA list (TSCA)	NO
Facility has inspections under FIFRA, TSCA or EPCRA (FTTS)	NO
Facility is listed in EPA's index system (FINDS)	YES - p4
Facility is listed in other database records (OTHER)	NO
POTENTIAL SUPERFUND LIABILITY Facility has a list of potentially responsible parties PRP	NO
TOTAL (YES)	1

SECTION 2: FACILITY DETAIL REPORTS

MULTIMEDIA

Facility is listed in EPA's index system

DATABASE: Facility Index System (FINDS)

RAWLINS LANDFILL
3/4 N. OF RAWLINS, HIGHWAY 287
RAWLINS, WY 82301
EDR ID #1016061836

This site is listed in the Federal FINDS database. The FINDS database may contain references to records from government databases included elsewhere in the report.
Please note: the FINDS database may also contain references to out of date records formerly associated with the site.

Registry ID: 110013949950
Facility Name: RAWLINS LANDFILL
Facility Address: 3/4 N. OF RAWLINS, HIGHWAY 287
RAWLINS, WY 82301
Facility URL: http://iaspub.epa.gov/enviro/fii_query_detail.disp_program_facility?p_registry_id=110013949950
FIPS: 56007
Fed Facility: Not reported
Tribal Land: Not reported
Tribal Name: Not reported
Congressional District: 00
Hydrologic Unit Code: 10180002
EPA Region: 08
Site Type: STATIONARY
Date Created: 11-APR-03
Date Updated: 30-NOV-12
U.S-Mexico Border: Not reported
Latitude: 41.7169
Longitude: -107.00047
Horizontal Collection: INTERPOLATION-OTHER
Horizontal Accuracy: Not reported
Reference Point: FACILITY CENTROID
Horizontal Datum: NAD83
Coordinates Source: Not reported
Environmental Interest/Information System

The NEI (National Emissions Inventory) database contains information on stationary and mobile sources that emit criteria air pollutants and their precursors, as well as hazardous air pollutants (HAPs).

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY

Program System ID: WYR000206086
Program Sys. Name: RCRAINFO
Env. Interest Type: UNSPECIFIED UNIVERSE
Env. Interest Start Dt.: 17-MAY-07
Start Date Qualifier: EARLIEST RCRAINFO DATE
Env. Interest End Dt.: Not reported
End Date Qualifier: Not reported
Data Source: RCRAINFO
Active Code: No

Program System ID: 6971911
Program Sys. Name: EIS
Env. Interest Type: CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY
Env. Interest Start Dt.: Not reported
Start Date Qualifier: Not reported
Env. Interest End Dt.: Not reported
End Date Qualifier: Not reported
Data Source: EIS
Active Code: Yes

Program System ID: NEIWYLF9274
Program Sys. Name: NEI
Env. Interest Type: CRITERIA AND HAZARDOUS AIR POLLUTANT INVENTORY
Env. Interest Start Dt.: Not reported
Start Date Qualifier: Not reported
Env. Interest End Dt.: Not reported
End Date Qualifier: Not reported
Data Source: NEI
Active Code: Not reported

SECTION 2: FACILITY DETAIL REPORTS

...Continued...

Alternative Name:	CITY OF RAWLINS
Alternative Name:	RAWLINS LANDFILL
NAICS Code:	562212(SOLID WASTE LANDFILL.)
SIC Code:	4953(REFUSE SYSTEMS)

SECTION 3: DATABASES AND UPDATE DATES

To maintain currency of the following federal, state and local databases, EDR contacts the appropriate government agency on a monthly or quarterly basis as required.

Elapsed ASTM days: Provides confirmation that this report meets or exceeds the 90-day updating requirement of the ASTM standard.

DATABASES FOUND IN THIS REPORT

FINDS: Facility Index System/Facility Registry System

Source: EPA

Telephone: Not reported

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 11/18/2013
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/10/2014
Date of Next Scheduled Update: 12/22/2014



Rawlins Landfill Expansion

3001 Gunclub Road
Rawlins, WY 82301

Inquiry Number: 4067782.9
September 18, 2014

The EDR Aerial Photo Decade Package



6 Armstrong Road, 4th Floor
Shelton, Connecticut 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Aerial Photo Decade Package

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Date EDR Searched Historical Sources:

Aerial Photography September 18, 2014

Target Property:

3001 Gunclub Road

Rawlins, WY 82301

<u><i>Year</i></u>	<u><i>Scale</i></u>	<u><i>Details</i></u>	<u><i>Source</i></u>
1946	Aerial Photograph. Scale: 1"=750'	Flight Date: August 08, 1946	EDR
1949	Aerial Photograph. Scale: 1"=750'	Flight Date: November 03, 1949	EDR
1954	Aerial Photograph. Scale: 1"=750'	Flight Date: September 21, 1954	EDR
1975	Aerial Photograph. Scale: 1"=750'	Flight Date: August 31, 1975	EDR
1989	Aerial Photograph. Scale: 1"=750'	Flight Date: July 03, 1989	EDR
1994	Aerial Photograph. Scale: 1"=500'	DOQQ - acquisition dates: July 22, 1994	USGS/DOQQ
2001	Aerial Photograph. Scale: 1"=750'	Flight Date: September 09, 2001	EDR
2006	Aerial Photograph. Scale: 1"=500'	Flight Year: 2006	USDA/NAIP
2009	Aerial Photograph. Scale: 1"=500'	Flight Year: 2009	USDA/NAIP
2012	Aerial Photograph. Scale: 1"=500'	Flight Year: 2012	USDA/NAIP



SITE

INQUIRY #: 4067782.9

YEAR: 1946

| = 750'





SITE

INQUIRY #: 4067782.9

YEAR: 1949

— = 750'





SITE

INQUIRY #: 4067782.9

YEAR: 1954

| = 750'





SITE

INQUIRY #: 4067782.9

YEAR: 1975

| = 750'





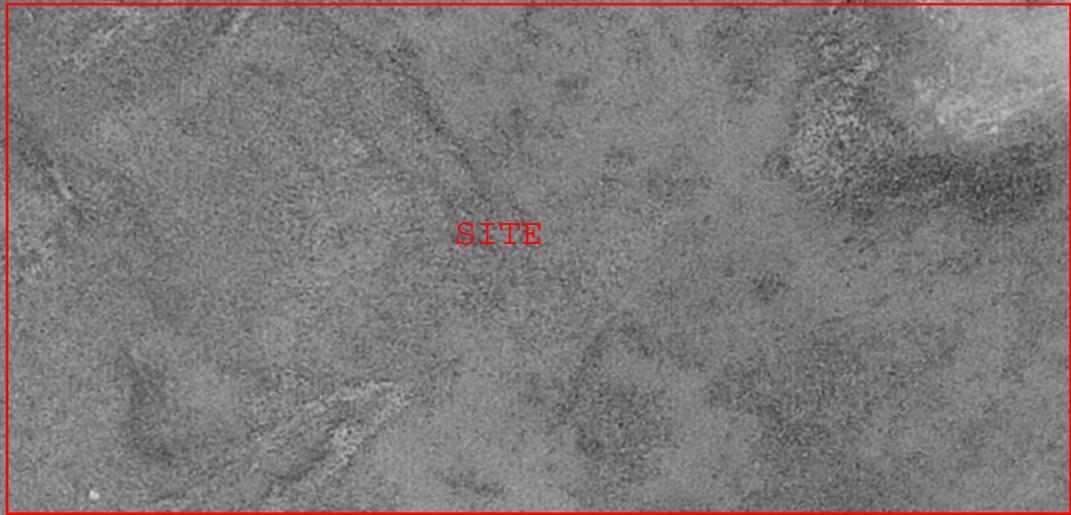
SITE

INQUIRY #: 4067782.9

YEAR: 1989

| = 750'





SITE

INQUIRY #: 4067782.9

YEAR: 1994

| = 500'





SITE

INQUIRY #: 4067782.9

YEAR: 2001

| = 750'





SITE

INQUIRY #: 4067782.9

YEAR: 2006

| = 500'





SITE



INQUIRY #: 4067782.9

YEAR: 2009

| = 500'





SITE

INQUIRY #: 4067782.9

YEAR: 2012

| = 500'





Rawlins Landfill Expansion

3001 Gunclub Road

Rawlins, WY 82301

Inquiry Number: 4067782.3

September 17, 2014

Certified Sanborn® Map Report



6 Armstrong Road, 4th Floor
Shelton, Connecticut 06484
Toll Free: 800.352.0050
www.edrnet.com

Certified Sanborn® Map Report

9/17/14

Site Name:

Rawlins Landfill Expansion
3001 Gunclub Road
Rawlins, WY 82301

Client Name:

Inberg-Miller Engineers
1120 East C Street
Casper, WY 82601

EDR Inquiry # 4067782.3

Contact: Eric Nunn



The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Inberg-Miller Engineers were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting www.edrnet.com/sanborn.

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

Certified Sanborn Results:

Site Name: Rawlins Landfill Expansion
Address: 3001 Gunclub Road
City, State, Zip: Rawlins, WY 82301
Cross Street:
P.O. # 17663-HW
Project: Rawlins Landfill Expansion
Certification # 9BB5-4FD5-9617



Sanborn® Library search results
Certification # 9BB5-4FD5-9617

UNMAPPED PROPERTY

This report certifies that the complete holdings of the Sanborn Library, LLC collection have been searched based on client supplied target property information, and fire insurance maps covering the target property were not found.

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- Library of Congress
- University Publications of America
- EDR Private Collection

The Sanborn Library LLC Since 1866™

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Rawlins Landfill Expansion

3001 Gunclub Road
Rawlins, WY 82301

Inquiry Number: 4067782.5
September 19, 2014

The EDR-City Directory Image Report

TABLE OF CONTENTS

SECTION

Executive Summary

Findings

City Directory Images

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EXECUTIVE SUMMARY

DESCRIPTION

Environmental Data Resources, Inc.'s (EDR) City Directory Report is a screening tool designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Report includes a search of available city directory data at 5 year intervals.

RESEARCH SUMMARY

The following research sources were consulted in the preparation of this report. A check mark indicates where information was identified in the source and provided in this report.

<u>Year</u>	<u>Target Street</u>	<u>Cross Street</u>	<u>Source</u>
2013	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Cole Information Services
2008	<input type="checkbox"/>	<input type="checkbox"/>	Cole Information Services
2003	<input type="checkbox"/>	<input type="checkbox"/>	Cole Information Services
1999	<input type="checkbox"/>	<input type="checkbox"/>	Cole Information Services
1995	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Cole Information Services
1992	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Cole Information Services
1966	<input type="checkbox"/>	<input type="checkbox"/>	Rocky Mountain's City Directory
1964	<input type="checkbox"/>	<input type="checkbox"/>	Rocky Mountain's City Directory

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FINDINGS

TARGET PROPERTY STREET

3001 Gunclub Road
Rawlins, WY 82301

Year

CD Image

Source

GUN CLUB RD

2013	pg A1	Cole Information Services	
2008	-	Cole Information Services	Street not listed in Source
2003	-	Cole Information Services	Street not listed in Source
1999	-	Cole Information Services	Street not listed in Source
1995	-	Cole Information Services	Street not listed in Source
1992	-	Cole Information Services	Street not listed in Source
1966	-	Rocky Mountain's City Directory	Street not listed in Source
1964	-	Rocky Mountain's City Directory	Street not listed in Source

FINDINGS

CROSS STREETS

Year CD Image Source

HIGHWAY 287

2013	pg. A2	Cole Information Services	
2008	-	Cole Information Services	Target and Adjoining not listed in Source
2003	-	Cole Information Services	Target and Adjoining not listed in Source
1999	-	Cole Information Services	Target and Adjoining not listed in Source
1992	pg. A5	Cole Information Services	
1966	-	Rocky Mountain's City Directory	Street not listed in Source
1964	-	Rocky Mountain's City Directory	Street not listed in Source

US HIGHWAY 287

2013	pg. A3	Cole Information Services
1995	pg. A4	Cole Information Services
1992	pg. A6	Cole Information Services

City Directory Images

GUN CLUB RD 2013

3001 RAWLINS CITY GOVERNMENT

Target Street

Cross Street

Source

-

✓

Cole Information Services

HIGHWAY 287

2013

3235 ANNA LOPE CAFE
4460 CARBON COUNTY FIRE DEPARTMENT
FRANK ERICKSON

US HIGHWAY 287

2013

1318 SUSAN HENRY
3571 GARY RAYMOND
3720 NATHANIEL TULLY
4337 ROBERT ZIGWEID
WENDELL JONES

US HIGHWAY 287

1995

200	CITY MARKET FLORAL & GIFT SHP
1016	WYOMING TOWING & RECOVERY

Target Street

Cross Street

Source

-

✓

Cole Information Services

HIGHWAY 287

1992

1026 WARD, WADE
1240 SUTTER, MASON

Target Street

Cross Street

Source

-

✓

Cole Information Services

US HIGHWAY 287

1992

1310 MCINTOSH, J



Rawlins Landfill Expansion

3001 Gunclub Road
Rawlins, WY 82301

Inquiry Number: 4067782.4
September 17, 2014

EDR Historical Topographic Map Report



6 Armstrong Road, 4th Floor
Shelton, Connecticut 06484
Toll Free: 800.352.0050
www.edrnet.com

EDR Historical Topographic Map Report

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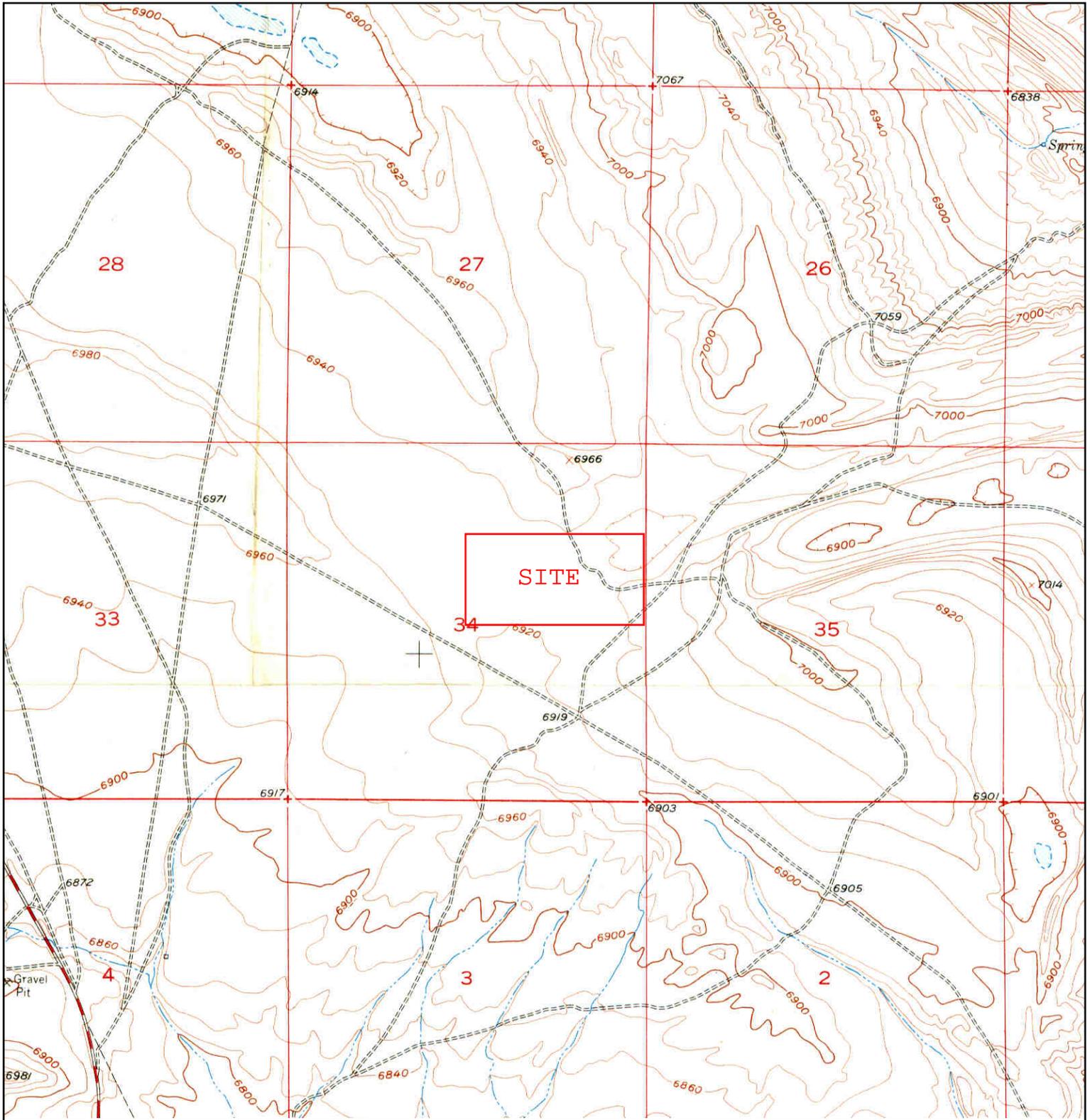
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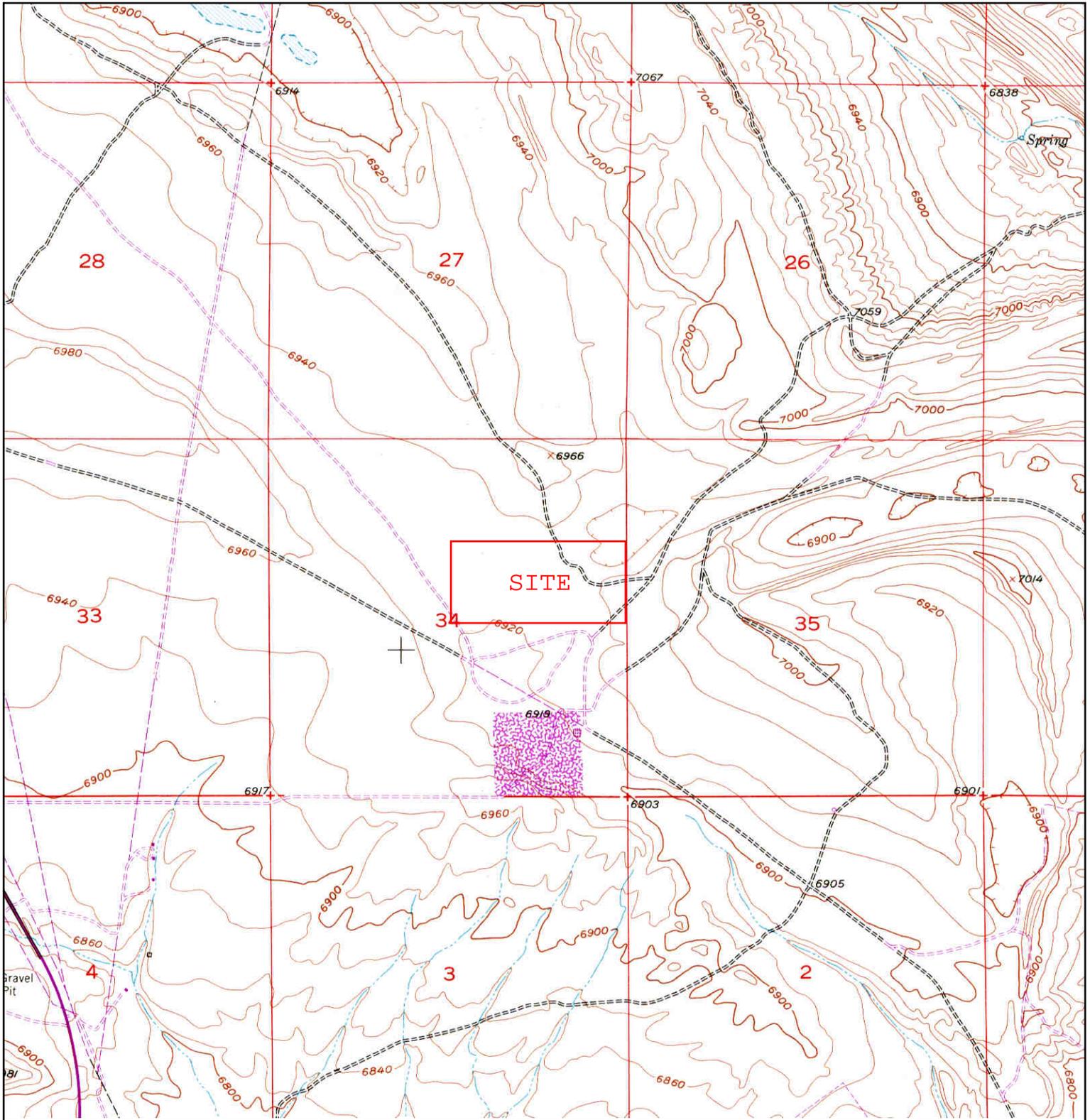
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Historical Topographic Map



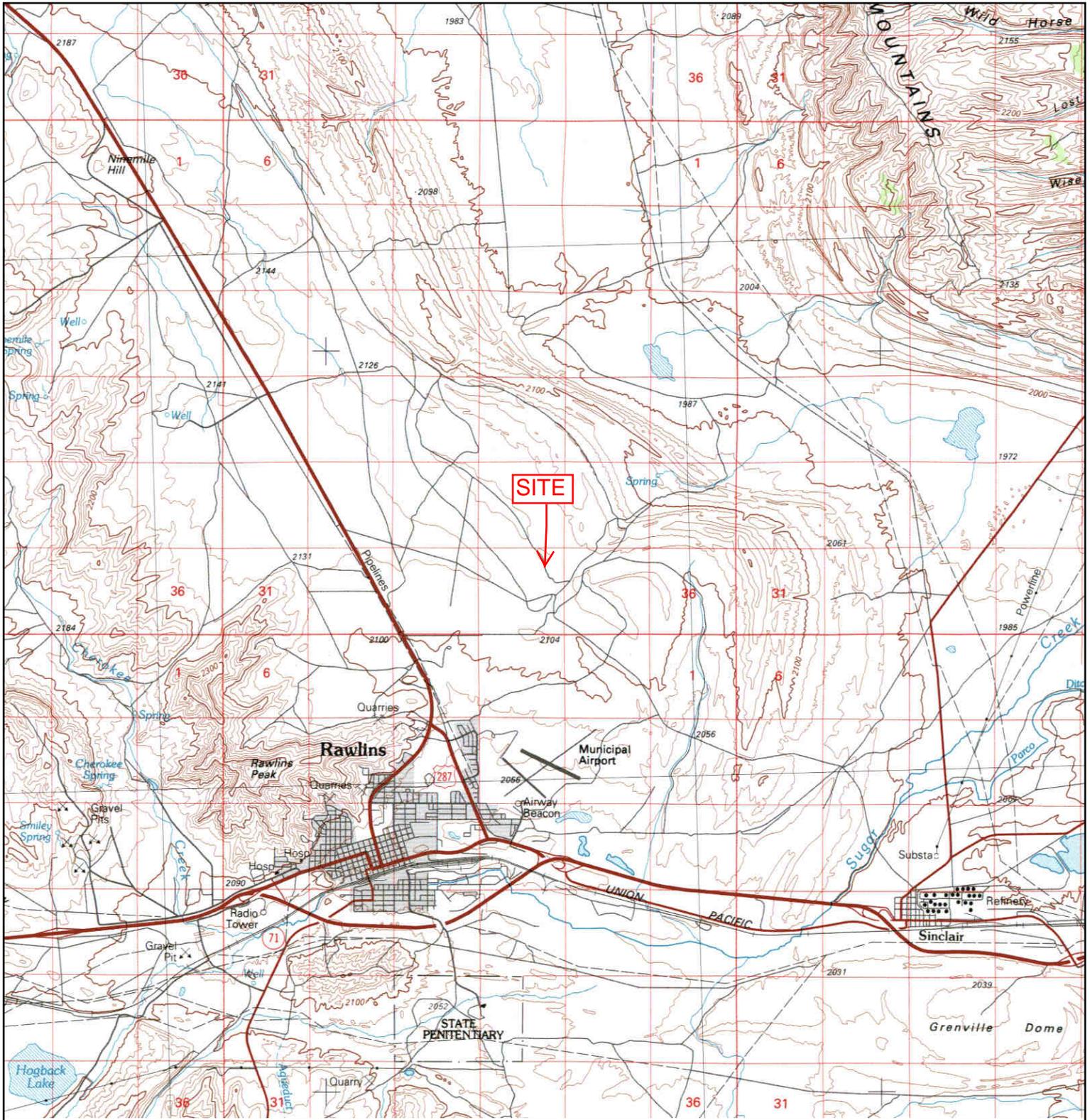
	TARGET QUAD	SITE NAME: Rawlins Landfill Expansion	CLIENT: Inberg-Miller Engineers
	NAME: RAWLINS	ADDRESS: 3001 Gunclub Road	CONTACT: Eric Nunn
	MAP YEAR: 1953	Rawlins, WY 82301	INQUIRY#: 4067782.4
	SERIES: 7.5	LAT/LONG: 41.8369 / -107.2009	RESEARCH DATE: 09/17/2014
	SCALE: 1:24000		

Historical Topographic Map



<p>N ↑</p>	TARGET QUAD	SITE NAME: Rawlins Landfill Expansion	CLIENT: Inberg-Miller Engineers
	NAME: RAWLINS	ADDRESS: 3001 Gunclub Road	CONTACT: Eric Nunn
	MAP YEAR: 1981	Rawlins, WY 82301	INQUIRY#: 4067782.4
	PHOTOREVISED FROM :1953	LAT/LONG: 41.8369 / -107.2009	RESEARCH DATE: 09/17/2014
	SERIES: 7.5		
	SCALE: 1:24000		

Historical Topographic Map



	TARGET QUAD	SITE NAME: Rawlins Landfill Expansion	CLIENT: Inberg-Miller Engineers
	NAME: RAWLINS	ADDRESS: 3001 Gunclub Road	CONTACT: Eric Nunn
	MAP YEAR: 1984	Rawlins, WY 82301	INQUIRY#: 4067782.4
	SERIES: 30	LAT/LONG: 41.8369 / -107.2009	RESEARCH DATE: 09/17/2014
	SCALE: 1:100000		

ENVIRONMENTAL DATABASE LIST

The following list describes the environmental databases reviewed through the Environmental Data Resources (EDR) Radius Report. The following information is obtained from the EDR Radius Report.

FEDERAL NPL SITE LIST

National Priority List (NPL)- National Priorities List (Superfund)

The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries.

Proposed National Priority List Sites (Proposed NPL)

A site that has been proposed for listing on the National Priorities List through the issuance of a proposed rule in the Federal Register. EPA then accepts public comments on the site, responds to the comments, and places on the NPL those sites that continue to meet the requirements for listing.

Federal Superfund Liens (NPL LIENS)

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

National Priority List Deletions (DELISTED NPL)

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

FEDERAL CERCLIS LIST

Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Federal Facility Site Information listing (FEDERAL FACILITY)

A listing of National Priority List (NPL) and Base Realignment and Closure (BRAC) sites found in the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) Database where EPA Federal Facilities Restoration and Reuse Office is involved in cleanup activities.

FEDERAL CERCLIS NFRAP SITE LIST

CERCLIS No Further Remedial Action Planned (CERCLIS-NFRAP)

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

FEDERAL RCRA CORRACTS FACILITIES LIST

Corrective Action Report (CORRACTS)

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

FEDERAL RCRA NON-CORRACTS TSD FACILITIES LIST

RCRA - Treatment, Storage and Disposal (RCRA-TSDF)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility.

FEDERAL RCRA GENERATORS LIST

RCRA - Large Quantity Generators (RCRA-LQG)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective

Phase I ESA- Environmental Database List

information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month.

RCRA - Small Quantity Generators (RCRA-SQG)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month.

RCRA - Conditionally Exempt Small Quantity Generators (RCRA-CESQG)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month.

FEDERAL INSTITUTIONAL CONTROLS / ENGINEERING CONTROLS REGISTRIES

Engineering Controls Sites List (US ENG CONTROLS)

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Sites with Institutional Controls (US INST CONTROL)

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Land Use Control Information System (LUCIS)

LUCIS contains records of land use control information pertaining to the former Navy Base Realignment and Closure properties.

FEDERAL ERNS LIST

Emergency Response Notification System (ERNS)

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

STATE AND TRIBAL LANDFILL AND/OR SOLID WASTE DISPOSAL SITE LISTS

Solid Waste Facility Database (SWF/LF)

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Solid & Hazardous Waste Facility Database (SHWF)

A listing of Solid and Hazardous waste facility locations in the state.

STATE AND TRIBAL LEAKING STORAGE TANK LISTS

Leaking storage tank sites (LTANKS)

Known Contaminated Sites.

Leaking Underground Storage Tanks on Indian Land (INDIAN LUST R8)

LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

STATE AND TRIBAL REGISTERED STORAGE TANK LISTS

Storage Tank Listing (TANKS)

A listing of aboveground and underground storage tank locations.

Underground Storage Tanks (UST)

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Phase I ESA- Environmental Database List

Wyoming Aboveground Storage Tanks (AST)
Registered Aboveground Storage Tanks.

Underground Storage Tanks on Indian Land (INDIAN UST R8)
The Indian Underground Storage Tank (UST) database provides information about underground storage tanks on Indian land in EPA Region 8 (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming and 27 Tribal Nations).

Underground Storage Tank Listing (FEMA UST)
A listing of all FEMA owned underground storage tanks.

STATE AND TRIBAL INSTITUTIONAL CONTROL / ENGINEERING CONTROL REGISTRIES

Engineering Controls Site Listing (ENG CONTROLS)
A listing of sites with engineering controls in place.

Sites with Institutional Controls (INST CONTROL)
Voluntary Remediation Program sites with institutional Controls in place.

STATE AND TRIBAL VOLUNTARY CLEANUP SITES

List of Voluntary Remediation Program Sites (VCP)
A listing of sites participating in the Voluntary Remediation Program.

STATE AND TRIBAL BROWNFIELDS SITES

Brownfields Sites Listing (BROWNFIELDS)
A listing of Brownfields sites locations. Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment.

LOCAL BROWNFIELD LISTS

A Listing of Brownfields Sites (US BROWNFIELDS)
Brownfields are real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Cleaning up and reinvesting in these properties takes development pressures off of undeveloped, open land, and both improves and protects the environment. Assessment, Cleanup and Redevelopment Exchange System (ACRES) stores information reported by EPA Brownfields grant recipients on brownfields properties assessed or cleaned up with grant funding as well as information on Targeted Brownfields Assessments performed by EPA Regions. A listing of ACRES Brownfield sites is obtained from Cleanups in My Community. Cleanups in My Community provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

LOCAL LISTS OF LANDFILL / SOLID WASTE DISPOSAL SITES

Open Dump Inventory (ODI)
An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Recycling Facilities (SWRCY)
A listing of recycling facility locations.

Report on the Status of Open Dumps on Indian Lands (INDIAN ODI)
Location of open dumps on Indian land.

LOCAL LISTS OF HAZARDOUS WASTE / CONTAMINATED SITES

Clandestine Drug Labs (US CDL)
A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

Clandestine Drug Lab Site Locations (CDL)
Information collected by the Wyoming Department of Health concerning Drug Lab Sites.

National Clandestine Laboratory Register (US HIST CDL)

Phase I ESA- Environmental Database List

A listing of clandestine drug lab locations. The U.S. Department of Justice ("the Department") provides this web site as a public service. It contains addresses of some locations where law enforcement agencies reported they found chemicals or other items that indicated the presence of either clandestine drug laboratories or dumpsites. In most cases, the source of the entries is not the Department, and the Department has not verified the entry and does not guarantee its accuracy. Members of the public must verify the accuracy of all entries by, for example, contacting local law enforcement and local health departments.

LOCAL LAND RECORDS

CERCLA Lien Information (LIENS 2)

A Federal CERCLA ('Superfund') lien can exist by operation of law at any site or property at which EPA has spent Superfund monies. These monies are spent to investigate and address releases and threatened releases of contamination. CERCLIS provides information as to the identity of these sites and properties.

RECORDS OF EMERGENCY RELEASE REPORTS

Hazardous Materials Information Reporting System (HMIRS)

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

SPILL Database (SPILLS)

Spills reported to the Department of Environmental Quality

OTHER ASCERTAINABLE RECORDS

RCRA - Non Generators (RCRA NonGen / NLR)

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

Incident and Accident Data (DOT OPS)

Department of Transportation, Office of Pipeline Safety Incident and Accident data.

Department of Defense Sites (DOD)

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Formerly Used Defense Sites (FUDS)

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Superfund (CERCLA) Consent Decrees (CONSENT)

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Records Of Decision (ROD)

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Uranium Mill Tailings Sites (UMTRA)

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Mines Master Index File (US MINES)

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Toxic Chemical Release Inventory System (TRIS)

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Toxic Substances Control Act (TSCA)

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Phase I ESA- Environmental Database List

FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act) (FTTS)

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act) (FTTS INSP)

A listing of FIFRA/TSCA Tracking System (FTTS) inspections and enforcements.

FIFRA/TSCA Tracking System Administrative Case Listing (HIST FTTS)

A complete administrative case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

FIFRA/TSCA Tracking System Inspection & Enforcement Case Listing (HIST FTTS INSP)

A complete inspection and enforcement case listing from the FIFRA/TSCA Tracking System (FTTS) for all ten EPA regions. The information was obtained from the National Compliance Database (NCDB). NCDB supports the implementation of FIFRA (Federal Insecticide, Fungicide, and Rodenticide Act) and TSCA (Toxic Substances Control Act). Some EPA regions are now closing out records. Because of that, and the fact that some EPA regions are not providing EPA Headquarters with updated records, it was decided to create a HIST FTTS database. It included records that may not be included in the newer FTTS database updates. This database is no longer updated.

Section 7 Tracking Systems (SSTS)

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Integrated Compliance Information System (ICIS)

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

PCB Activity Database System (PADS)

PCB Activity Database. PADS identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Material Licensing Tracking System (MLTS)

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Radiation Information Database (RADINFO)

The Radiation Information Database (RADINFO) contains information about facilities that are regulated by U.S. Environmental Protection Agency (EPA) regulations for radiation and radioactivity.

Facility Index System/Facility Registry System (FINDS)

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

RCRA Administrative Action Tracking System (RAATS)

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Phase I ESA- Environmental Database List

Risk Management Plans (RMP)

When Congress passed the Clean Air Act Amendments of 1990, it required EPA to publish regulations and guidance for chemical accident prevention at facilities using extremely hazardous substances. The Risk Management Program Rule (RMP Rule) was written to implement Section 112(r) of these amendments. The rule, which built upon existing industry codes and standards, requires companies of all sizes that use certain flammable and toxic substances to develop a Risk Management Program, which includes a(n): Hazard assessment that details the potential effects of an accidental release, an accident history of the last five years, and an evaluation of worst-case and alternative accidental releases; Prevention program that includes safety precautions and maintenance, monitoring, and employee training measures; and Emergency response program that spells out emergency health care, employee training measures and procedures for informing the public and response agencies (e.g the fire department) should an accident occur.

Biennial Reporting System (BRS)

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

UIC Well Locations List (UIC)

A listing of Class I and Class V UIC wells.

Indian Reservations (INDIAN RESERV)

This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Sleam-Electric Plan Operation Data (COAL ASH DOE)

A listing of power plants that store ash in surface ponds.

Air Facility System Data (US AIRS MINOR)

A listing of minor source facilities.

Coal Combustion Residues Surface Impoundments List (COAL ASH EPA)

A listing of coal combustion residues surface impoundments with high hazard potential ratings.

Federal and Indian Lands (FEDLAND)

Federally and Indian administrated lands of the United States. Lands included are administrated by: Army Corps of Engineers, Bureau of Reclamation, National Wild and Scenic River, National Wildlife Refuge, Public Domain Land, Wilderness, Wilderness Study Area, Wildlife Management Area, Bureau of Indian Affairs, Bureau of Land Management, Department of Justice, Forest Service, Fish and Wildlife Service, National Park Service.

Lead Smelter Sites (LEAD SMELTER 2)

A list of several hundred sites in the U.S. where secondary lead smelting was done from 1931 and 1964. These sites may pose a threat to public health through ingestion or inhalation of contaminated soil or dust

Potentially Responsible Parties (PRP)

A listing of verified Potentially Responsible Parties

Financial Assurance Information listing (Financial Assurance)

Information for underground storage 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.

Financial Assurance Information (US FIN ASSUR)

All owners and operators of facilities that treat, store, or dispose of hazardous waste are required to provide proof that they will have sufficient funds to pay for the clean up, closure, and post-closure care of their facilities.

Aerometric Information Retrieval System Facility Subsystem (AFS) (US AIRS (AFS))

The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

Lead Smelter Sites (LEAD SMELTER 1)

A listing of former lead smelter site locations.

EPA WATCH LIST: EPA WATCH LIST

EPA maintains a "Watch List" to facilitate dialogue between EPA, state and local environmental agencies on enforcement matters relating to facilities with alleged violations identified as either significant or high priority. Being on the Watch List does not mean that the facility has actually violated the law only that an investigation by EPA or a state or local environmental agency has led those organizations to allege that an unproven violation has in fact occurred. Being on the Watch List does not represent a higher level of concern regarding the alleged violations that were detected, but instead indicates cases requiring additional dialogue between EPA, state and local agencies - primarily because of the length of time the alleged violation has gone unaddressed or unresolved.

PCB Transformer Registration Database (PCB TRANSFORMER)

The database of PCB transformer registrations that includes all PCB registration submittals.

Mine Locations Listing (MINES)

Coal mine locations and production; commodity mine locations; mining lease boundaries for the Powder River Basin; Mine permit boundaries for the BLM Rawlins Field Office.

2020 Corrective Action Program List (2020 COR ACTION)

The EPA has set ambitious goals for the RCRA Corrective Action program by creating the 2020 Corrective Action Universe. This RCRA cleanup baseline includes facilities expected to need corrective action. The 2020 universe contains a wide variety of sites. Some properties are heavily contaminated while others were contaminated but have since been cleaned up. Still others have not been fully investigated yet, and may require little or no remediation. Inclusion in the 2020 Universe does not necessarily imply failure on the part of a facility to meet its RCRA obligations.

EDR HIGH RISK HISTORICAL RECORDS

EDR Proprietary Manufactured Gas Plants (EDR MGP)

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

EDR Exclusive Historic Gas Stations (EDR US Hist Auto Stat)

EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

EDR Exclusive Historic Dry Cleaners (EDR US Hist Cleaners)

EDR has searched selected national collections of business directories and has collected listings of potential dry cleaner sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include dry cleaning establishments. The categories reviewed included, but were not limited to dry cleaners, cleaners, laundry, laundromat, cleaning/laundry, wash & dry etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

Recovered Government Archive Leaking Underground Storage Tank (RGA LUST)

Recovered Government Archive Leaking Underground Storage Tank

APPENDIX C



INBERG-MILLER ENGINEERS

Quality Solutions Through Teamwork

August 29, 2014

17663-HWP

Danielle Gross
City of Rawlins
PO Box 953
Rawlins, WY 82301

RE: PHASE I ENVIRONMENTAL SITE ASSESSMENT
DOCUMENT INQUIRY AND QUESTIONNAIRE
PROPERTY ADDRESS
CITY, STATE

Dear Danielle:

In order to qualify for one of the CERCLA Landowner Liability Protections by performing all appropriate inquiry into the past ownership of a property, the ESA User must provide the following information to Inberg-Miller Engineers (IME).

- 1) Are you aware of any environmental cleanup liens against the property that are filed or recorded under federal, tribal, state or local law? No Yes If Yes, please explain.

- 2) Are you aware of any Activity Use Limitations (AULs), such as engineering controls, and land use restrictions or institutional controls that are in place at the site and/or have been filed or recorded in a registry under federal, tribal, state or local law? No Yes If Yes, please explain.

- 3) As the user of this ESA do you have any specialized knowledge or experience related to the property or nearby properties? For example, are you involved in the same line of business as the current or former occupants of the property or an adjoining property so that you would have specialized knowledge of the chemicals and processes used by this type of business? No Yes If Yes, please explain.

- 4) Does the purchase price being paid for this property reasonably reflect the fair market value of the property? If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the property?
 No Yes If No, please explain.

- 5) Are you aware of commonly known or reasonable ascertainable information about the property that would help identify conditions indicative of release or threatened releases?
 No Yes If Yes, please explain.

For Example:

- a. Do you know the past uses of the property?
 - b. Do you know of specific chemicals that are present or once were present at the property?
 - c. Do you know of spills or other chemical releases that have taken place at the property?
 - d. Do you know of any environmental cleanups that have taken place at the property?
- 6) As the user of the ESA, based on your knowledge and experience related to the property are there any obvious indicators that point to the presence or likely presence of contaminants at the property? No Yes If Yes, please explain.

Request for Helpful Information

In addition to the questions above, the user is requested to provide the following information and documentation, if available, to the Environmental Professional. ASTM 1527-13 requires this information, if available, be provided prior to the site visit.

<i>Information or Document Provided (X)</i>	<i>Not Available, Not Applicable, or Not Known (X)</i>	<i>Information Requested</i>	<i>Contact Information, Comments, or Indicate Attachment</i>
X		Site Contact	Danielle Gross PO BOX 953 Rawlins, WY 82301 307-328-4599 BLM-Rawlins Field Office 1300 N. Third Rawlins, WY
X		Current Owner	
X		Current Site Manager	
	X	Past Owners	Beth Holden 307-328-4259
	X	Past Occupants	

Information or Document Provided (X)	Not Available, Not Applicable, or Not Known (X)	Information Requested	Contact Information, Comments, or Indicate Attachment
X		How long have you been familiar with the Property Type of Property and Transaction taking place Complete Property Location- Description, Boundaries, and Map Site Contact	Attached 5 1/2 NE 1/4 Section 34, T22N R87W
X	X	Access Restrictions	
X		Reason Why the Phase I is Being Performed	Potential conveyance from BLM to City of Rawlins
X	X	Special Confidentiality Requirements	
X		Will anyone else be relying on the Phase I	BLM
		Special Publication Requirements i.e. (Physical Copies)	

Helpful Document Checklist

Following Section 10.8 of ASTM E1527-13, do you know whether any of the following documents exist and, if so, whether copies can be provided to the environmental professional within reasonable time and cost constraints? Check all that apply.

Documents	
<input type="checkbox"/> Environmental Site Assessment Reports	<input type="checkbox"/> Safety Plans, Preparedness and Prevention Plans, SPCC
<input type="checkbox"/> Environmental Compliance Audit Reports	<input type="checkbox"/> Reports regarding Hydrogeologic Conditions
<input type="checkbox"/> Environmental Permits (wastewater discharge, solid waste, NPDES)	<input type="checkbox"/> Government Agency Notices (Relating to violations of environmental laws or liens)
<input type="checkbox"/> Underground and Above-ground Storage Tank Registrations	<input type="checkbox"/> Hazardous Waste Generator Notices or Reports
<input type="checkbox"/> Underground Injection System Registration	<input type="checkbox"/> Risk Assessments
<input type="checkbox"/> Material Data Safety Sheet	<input type="checkbox"/> Recorded Activity Use Limitations
<input type="checkbox"/> Community Right-to-Know Plans	

Danielle Gross
Name

Danielle Gross
Signature

Administrative Secretary
Title

9.15.14
Date

INTERVIEW FORM

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Client: City of Rawlins
Project: Rawlins Landfill Expansion Phase I ESA Job No.: 17633-HW
Interviewer: Eric Nunn Interviewee: Nile Layton
Position/Title of Interviewee: BLM-Physical Scientist/Hazmat Coordinator
Interview Date and Time: 10/1/14 2:50pm
Time Period Over Which the Interviewee is Knowledgeable about the Site: Approximately 4 Years with the BLM

General Discussion of Environmental Issues on the Site: Observed the property during a site visit a while back. Not aware of any environmental concerns associated with hazardous substances or petroleum products at the subject property.

General Discussion of Environmental Issues in the Site Vicinity: Not aware of any environmental concerns at the adjoining properties.

- Suggested Topics:*
- Timeline of Owners/Occupants
 - Past Uses of Land/Buildings
 - Pits, Ponds, Lagoons/Topography
 - USTs and ASTs
 - Drains or Sumps
 - Odors
 - Adjoining Property Use

INTERVIEW FORM

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Client: City of Rawlins
Project: Rawlins Landfill Expansion Phase I ESA Job No.: 17633-HW
Interviewer: Eric Nunn Interviewee: Travis Bargsten
Position/Title of Interviewee: BLM- Physical Scientist/ Hazmat Coordinator
Interview Date and Time: 10/1/14 3:00pm
Time Period Over Which the Interviewee is Knowledgeable about the Site: N/A

General Discussion of Environmental Issues on the Site: Not aware of any environmental concerns associated with hazardous substances or petroleum products at the subject property.

General Discussion of Environmental Issues in the Site Vicinity: Aware of some waste management issues at the Rawlins Landfill identified during the public comment period when the BLM was transferring BLM land to the City of Rawlins. Previously the Rawlins Landfill was leased to the City of Rawlins through a RPR Patent from the 1970's. Not aware of any other concerns in the vicinity.

- Suggested Topics:*
- Timeline of Owners/Occupants
 - Past Uses of Land/Buildings
 - Pits, Ponds, Lagoons/Topography
 - USTs and ASTs
 - Drains or Sumps
 - Odors
 - Adjoining Property Use

INTERVIEW FORM

PHASE I ENVIRONMENTAL SITE ASSESSMENT

Client: City of Rawlins
Project: Rawlins Landfill Expansion Phase I ESA Job No.: 17633-HW
Interviewer: Eric Nunn Interviewee: Becky Dietrich
Position/Title of Interviewee: WDEQ-SHWD Solid Waste & Corrective Action Program
Interview Date and Time: 9/29/14 2:30pm
Time Period Over Which the Interviewee is Knowledgeable about the Site: N/A

General Discussion of Environmental Issues on the Site: Not aware of any environmental concerns associated with hazardous substances or petroleum products at the subject property. Based on monitoring well information in the area, the groundwater is relatively shallow.

General Discussion of Environmental Issues in the Site Vicinity: Not aware of any environmental concerns at the adjoining properties.

- Suggested Topics:*
- Timeline of Owners/Occupants
 - Past Uses of Land/Buildings
 - Pits, Ponds, Lagoons/Topography
 - USTs and ASTs
 - Drains or Sumps
 - Odors
 - Adjoining Property Use

Eric Nunn, E.I.T.

Civil and Environmental Engineer

EXPERIENCE

Mr. Nunn's background includes materials testing fieldwork consisting of nuclear gage soil and asphalt density, concrete slump and air content; lab work consisting of concrete cylinder strength, Atterbergs, proctors, sieves, and consolidation; surveying consisting of GPS staking, Total Station leveling, traversing, and elevation calculations. Mr. Nunn is also proficient in AutoCAD: subdivisions layouts, road grade profiles, and isometric drawings. Mr. Nunn is currently concentrating on environmental engineering including soil sampling, installation of groundwater monitor wells, environmental permitting, and the investigation of and preparation of environmental site assessments.

EDUCATION University of Wyoming, B.S. Civil Engineering (2011)

PROFESSIONAL EXPERTISE Environmental Site Assessments, Subsurface Investigations, Construction Observation, Construction Materials Testing, and Surveying

YEARS OF EXPERIENCE 3 years

REGISTRATIONS Engineer-in-Training
State of Wyoming #5661

PROFESSIONAL AFFILIATIONS Wyoming Engineering Society

CERTIFICATIONS 40 HOUR HAZWOPER, Federal Occupational Safety and Health Administration (OSHA) Title 29, Part 1910.120

ASTM Training on Phase I and II Environmental Site Assessments

Eric T. Graney, P.G.

Senior Vice President / Hydrogeologist

EXPERIENCE

Mr. Graney is a licensed Professional Geologist in Wyoming and is experienced in geologic and hydrogeologic site assessments and studies in the upper Midwest and Western United States. His experience includes environmental site assessments, remediation assessments and design, seismic analysis, dewatering, geologic mapping, and waste management. Mr. Graney specializes in evaluating subsurface soil data, geochemical/hydrogeochemical data, and groundwater information. As an experienced driller, he has supervised drilling, sampling, and monitor well installations in many different geological settings.

EDUCATION B.S. Geology, University of North Dakota, 1987
Coursework towards M.S. Geology Degree, Emphasis in Hydrogeology

HONORS Research Grant from University of North Dakota Graduate School, 1989
Hugh and Ruth Palmer Scholarship, 1985 and 1986

PROFESSIONAL EXPERTISE Hydrogeology, Geology, and Environmental Geology

YEARS OF EXPERIENCE 26 years

REGISTRATIONS Professional Geologist, State of WY #853

PROFESSIONAL AFFILIATIONS Wyoming Geological Association
Mining Associates of Wyoming
NGWA – National Ground Water Association
Wyoming Water Association - Business Member

CERTIFICATIONS Certified in Hazardous Waste Site Worker and Hazardous Materials and Site Investigations Supervisor, Federal Occupational Safety and Health Administration (OSHA) Title 29, Part 1910.120

Certified Radiological Safety and Nuclear Density Gauge Operator
Certified/Safety Trained in Hydrogen Sulfide/Carbon Dioxide Gas
Certified in Mine Safety Training, 16-Hour Experienced Miner
Certified in Adult CPR & First Aid
Certified in PEC Basic Safety Awareness

Important Information About Your Geoenvironmental Report

Geoenvironmental studies are commissioned to gain information about environmental conditions on and beneath the surface of a site. The more comprehensive the study, the more reliable the assessment is likely to be. But remember: Any such assessment is to a greater or lesser extent based on professional opinions about conditions that cannot be seen or tested. Accordingly, no matter how many data are developed, risks created by unanticipated conditions will always remain. *Have realistic expectations.* Work with your geoenvironmental consultant to manage known and unknown risks. Part of that process should already have been accomplished, through the risk allocation provisions you and your geoenvironmental professional discussed and included in your contract's general terms and conditions. This document is intended to explain some of the concepts that may be included in your agreement, and to pass along information and suggestions to help you manage your risk.

Beware of Change; Keep Your Geoenvironmental Professional Advised

The design of a geoenvironmental study considers a variety of factors that are subject to change. Changes can undermine the applicability of a report's findings, conclusions, and recommendations. *Advise your geoenvironmental professional about any changes you become aware of.* Geoenvironmental professionals cannot accept responsibility or liability for problems that occur because a report fails to consider conditions that did not exist when the study was designed. Ask your geoenvironmental professional about the types of changes you should be particularly alert to. Some of the most common include:

- modification of the proposed development or ownership group,
- sale or other property transfer,
- replacement of or additions to the financing entity,
- amendment of existing regulations or introduction of new ones, or
- changes in the use or condition of adjacent property.

Should you become aware of any change, *do not rely on a geoenvironmental report.* Advise your geoenvironmental professional immediately; follow the professional's advice.

Recognize the Impact of Time

A geoenvironmental professional's findings, recommendations, and conclusions cannot remain valid indefinitely. The more time that passes, the more likely it is that important latent changes will occur. *Do not rely on a geoenvironmental report if too much time has elapsed since it was completed.* Ask your environmental professional to define "too much time." In the case of Phase I Environmental Site Assessments (ESAs), for example, more than 180 days after submission is generally considered "too much."

Prepare To Deal with Unanticipated Conditions

The findings, recommendations, and conclusions of a Phase I ESA report typically are based on a review of historical information, interviews, a site "walkover," and other forms of noninvasive research. When site subsurface conditions are not sampled in any way, the risk of unanticipated conditions is higher than it would otherwise be.

While borings, installation of monitoring wells, and similar invasive test methods can help reduce the risk of unanticipated conditions, *do not overvalue the effectiveness of testing.* Testing provides information about actual conditions only at the precise locations where samples are taken, and only when they are taken. Your geoenvironmental professional has applied that specific information to develop a general opinion about environmental conditions. *Actual conditions in areas not sampled may differ (sometimes sharply) from those predicted in a report.* For example, a site may contain an unregistered underground storage tank that shows no surface trace of its existence. *Even conditions in areas that were tested can change,* sometimes suddenly, due to any number of events, not the least of which include occurrences at

adjacent sites. Recognize, too, that *even some conditions in tested areas may go undiscovered*, because the tests or analytical methods used were designed to detect only those conditions assumed to exist.

Manage your risks by retaining your geoenvironmental professional to work with you as the project proceeds. Establish a contingency fund or other means to enable your geoenvironmental professional to respond rapidly, in order to limit the impact of unforeseen conditions. And to help prevent any misunderstanding, identify those empowered to authorize changes and the administrative procedures that should be followed.

Do Not Permit Any Other Party To Rely on the Report

Geoenvironmental professionals design their studies and prepare their reports to meet the specific needs of the clients who retain them, in light of the risk management methods that the client and geoenvironmental professional agree to, and the statutory, regulatory, or other requirements that apply. The study designed for a developer may differ sharply from one designed for a lender, insurer, public agency...or even another developer. *Unless the report specifically states otherwise, it was developed for you and only you.* Do not unilaterally permit any other party to rely on it. The report and the study underlying it may not be adequate for another party's needs, and you could be held liable for shortcomings your geoenvironmental professional was powerless to prevent or anticipate. Inform your geoenvironmental professional when you know or expect that someone else—a third-party—will want to use or rely on the report. *Do not permit third-party use or reliance until you first confer with the geoenvironmental professional who prepared the report.* Additional testing, analysis, or study may be required and, in any event, appropriate terms and conditions should be agreed to so both you and your geoenvironmental professional are protected from third-party risks. *Any party who relies on a geoenvironmental report without the express written permission of the professional who prepared it and the client for whom it was prepared may be solely liable for any problems that arise.*

Avoid Misinterpretation of the Report

Design professionals and other parties may want to rely on the report in developing plans and specifications. They need to be advised, in writing, that their needs may not have been considered when the study's scope was developed, and, even if their needs were considered, they might misinterpret geoenvironmental findings, conclusions, and recommendations. *Commission your geoenvironmental professional to explain pertinent elements of the report to others who are permitted to rely on it, and to review any plans, specifications or other instruments of professional service that incorporate any of the report's findings, conclusions, or recommendations.* Your geoenvironmental professional has the best understanding of the issues involved, including the fundamental assumptions that underpinned the study's scope.

Give Contractors Access to the Report

Reduce the risk of delays, claims, and disputes by giving contractors access to the full report, *providing that it is accompanied by a letter of transmittal that can protect you* by making it unquestionably clear that: 1) the study was not conducted and the report was not prepared for purposes of bid development, and 2) the findings, conclusions, and recommendations included in the report are based on a variety of opinions, inferences, and assumptions and are subject to interpretation. Use the letter to also advise contractors to consult with your geoenvironmental professional to obtain clarifications, interpretations, and guidance (a fee may be required for this service), and that—in any event—they should conduct additional studies to obtain the specific type and extent of information each prefers for preparing a bid or cost estimate. Providing access to the full report, with the appropriate caveats, helps prevent formation of adversarial attitudes and claims of concealed or differing conditions. If a contractor elects to ignore the warnings and advice in the letter of transmittal, it would do so at its own risk. Your geoenvironmental professional should be able to help you prepare an effective letter.

Do Not Separate Documentation from the Report

Geoenvironmental reports often include supplemental documentation, such as maps and copies of regulatory files, permits, registrations, citations, and correspondence with regulatory agencies. If subsurface explorations were performed, the report may contain final boring logs and copies of laboratory data. If remediation activities occurred on site, the report may include: copies of daily field reports; waste manifests; and information about the disturbance of subsurface materials, the type and thickness of any fill placed on site, and fill placement practices, among other types of documentation. *Do not separate supplemental documentation from the report. Do not, and do not permit any other party to redraw or modify any of the supplemental documentation for incorporation into other professionals' instruments of service.*

Understand the Role of Standards

Unless they are incorporated into statutes or regulations, standard practices and standard guides developed by the American Society for Testing and Materials (ASTM) and other recognized standards-developing organizations (SDOs) are little more than aspirational methods agreed to by a consensus of a committee. The committees that develop standards may not comprise those best-qualified to establish methods and, no matter what, no standard method can possibly consider the infinite client- and project-specific variables that fly in the face of the theoretical "standard conditions" to which standard practices and standard guides apply. In fact, these variables can be so pronounced that geoenvironmental professionals who comply with every directive of an ASTM or other standard procedure could run afoul of local custom and practice, thus violating the standard of care.

Accordingly, when geoenvironmental professionals indicate in their reports that they have performed a service "in general compliance" with one standard or another, it means they have applied professional judgement in creating and implementing a scope of service designed for the specific client and project involved, and which follows some of the general precepts laid out in the referenced standard. To the extent that a report indicates "general compliance" with a standard, you may wish to speak with your geoenvironmental professional to learn more about what was and was not done. *Do not assume a given standard was followed to the letter.* Research indicates that that seldom is the case.

Realize that Recommendations May Not Be Final

The technical recommendations included in a geoenvironmental report are based on assumptions about actual conditions, and so are preliminary or tentative. Final recommendations can be prepared only by observing actual conditions as they are exposed. For that reason, you should retain the geoenvironmental professional of record to observe construction and/or remediation activities on site, to permit rapid response to unanticipated conditions. *The geoenvironmental professional who prepared the report cannot assume responsibility or liability for the report's recommendations if that professional is not retained to observe relevant site operations.*

Understand That Geotechnical Issues Have Not Been Addressed

Unless geotechnical engineering was specifically included in the scope of professional service, a report is not likely to relate any findings, conclusions, or recommendations about the suitability of subsurface materials for construction purposes, especially when site remediation has been accomplished through the removal, replacement, encapsulation, or chemical treatment of on-site soils. The

equipment, techniques, and testing used by geotechnical engineers differ markedly from those used by geoenvironmental professionals; their education, training, and experience are also significantly different. If you plan to build on the subject site, but have not yet had a geotechnical engineering study conducted, your geoenvironmental professional should be able to provide guidance about the next steps you should take. The same firm may provide the services you need.

Read Responsibility Provisions Closely

Geoenvironmental studies cannot be exact; they are based on professional judgement and opinion. Nonetheless, some clients, contractors, and others assume geoenvironmental reports are or certainly should be unerringly precise. Such assumptions have created unrealistic expectations that have led to wholly unwarranted claims and disputes. To help prevent such problems, geoenvironmental professionals have developed a number of report provisions and contract terms that explain who is responsible for what, and how risks are to be allocated. Some people mistake these for "exculpatory clauses," that is, provisions whose purpose is to transfer one party's rightful responsibilities and liabilities to someone else. Read the responsibility provisions included in a report and in the contract you and your geoenvironmental professional agreed to. *Responsibility provisions are not "boilerplate."* They are important.

Rely on Your Geoenvironmental Professional for Additional Assistance

Membership in ASFE exposes geoenvironmental professionals to a wide array of risk management techniques that can be of genuine benefit for everyone involved with a geoenvironmental project. Confer with your ASFE-member geoenvironmental professional for more information.

ASFE

8811 Colesville Road/Suite G106, Silver Spring, MD 20910

Telephone: 301/565-2733 Facsimile: 301/589-2017

e-mail: info@asfe.org www.asfe.org

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WHY REALTORS AND BANKERS SHOULD NOT WORRY ABOUT LEAKING REGULATED STORAGE TANKS IN WYOMING

In the event of a property sale or foreclosure, environmental liability can be a concern for real estate and banking professionals. In Wyoming, environmental liability from leaking regulated storage tank systems should not be as large of a concern as in other states. As long as the regulated storage tank system owner/operator or contaminated site owner is in compliance with state law and regulation, contamination from a regulated storage tank system is eligible for remediation by the state. Remediation is managed through the Wyoming Department of Environmental Quality (WDEQ), Solid & Hazardous Waste Division (SHWD), Storage Tank Program (STP) using funds from the state's corrective action account.

What is a regulated storage tank system?

Any underground storage tank larger than 110 gallons (or 1,100 gallons on a farm, ranch, or residence) is a regulated tank system if it contains petroleum or hazardous substances. Any aboveground storage tank, regardless of size, is a regulated storage tank system if it is used by a fuel dealer to sell gasoline or diesel to the public. Participation in the Wyoming STP is not optional for regulated storage tank systems operating today. Owners of tanks that were taken out of service before the program was initiated can enter the program voluntarily provided the tank would be classified as a regulated storage tank system if operated today.

Requirements for state-funded remediation

There are five requirements for a storage tank system owner/operator to be in compliance with state law and regulation. If these five requirements are met, the facility is participating in the Wyoming STP and is eligible for state-funded remediation.

1. Submission of the "Notification of Storage Tanks" form whenever there is a change made to the storage tank system. Changes include piping changes, changes in leak detection method, changes in product stored, and changes made to the corrosion protection system.

2. Full payment of appropriate annual tank and installation/modification inspection fees. The STP fee is \$200 per year per tank. These fees are based on a calendar year, they are not prorated, they are not optional, and they are due no later than January 1 of each year. Fees for all applicable years must be paid for a facility to be eligible for state-funded remediation. The fees are attached to the facility; not the owner. If the owner of a facility changes and fees were not paid by the previous owner, the new owner is responsible for paying all back fees if he/she desires to be eligible for state-funded remediation.

3. Submission of an "Operator's Annual Inspection." Compliance with this requirement means conducting cathodic protection tests (if due), conducting required tests of lines and line leak detectors, submitting a year's worth of tank leak detection tests, and making a physical inspection of the entire facility. (See Chapter 17 of the Water Quality Rules and Regulations for complete requirements.) Tanks that are temporarily out of use (TOU) and empty (less than 1 inch of product/residue or 0.3 percent of product/residue, by weight, of the tank's total storage capacity) do not need to meet the leak detection requirement. Tanks can remain TOU and empty for up to 3 years. At the end of the 3-year period, the owner/operator has three choices: 1) bring the tank back into use, 2) properly abandon the tank, or 3) perform a minimum site assessment (at the owner/operator's expense). Any cathodic protection systems on a TOU tank must remain in operation and be tested on the required schedule. All TOU tanks in Wyoming have been fully upgraded to the 1998 standards. Any tank that does not meet the 1998 standards cannot be put back into use.

4. All facilities where the tanks were installed prior to December 22, 1988, were required to have completed a minimum site assessment (MSA) by December 22, 1998. If tanks were installed after 1988, an

MSA is required no sooner than the eighteenth and no later than the twentieth anniversary of the tank installation. MSAs are not required if an STP system is shown as a contaminated site. MSAs must be conducted in accordance with Part F of Chapter 17, Wyoming Water Quality Rules and Regulations.

5. The owner/operator of any active STP site or a contaminated site with no active tanks must provide the department access to the site for the purpose of remediation.

Contaminated sites with **no** active tank systems on the property must meet the following three requirements for continued eligibility in the state-funded remediation program:

1. Full payment of the \$200 per year contaminated site fee. The legislature placed a cap of 10 consecutive years on the annual contaminated site fee payment for sites where remediation has not been started. After the 10-year period, the contaminated site fee is **suspended** until active remediation begins. The contaminated site fee **starts again** when remediation begins and continues until the project is complete.

2. Notify the department of any site ownership changes.

3. Maintain financial assurance responsibility.

The state-funded remediation program applies to all regulated storage tanks regardless of ownership. Storage tank owners/operators and contaminated site owners that meet the requirements above are entitled to the state corrective action program. The state fund also provides the financial responsibility, required by federal law, for eligible tank owners with a \$30,000 deductible.

It is department policy not to hinder construction on or development of a contaminated site. The department asks for cooperation and access to the property until the remediation project is complete.

What Does an Eligible Tank Owner Get When Participating In The Wyoming Storage Tank Program?

Two state programs are available for eligible tank owners:

1. Corrective Action Account. If contamination is due to a release from an eligible tank system (tank and piping), the corrective action account will pay the **entire** remediation cost for the site and affected third party sites. Site remediation costs can easily exceed \$300,000. If remediation cannot be done at the time the contamination is discovered, the site is prioritized using a scoring system contained in Chapter 17, Water Quality Rules and Regulations. Remediation is accomplished based on, in general, priority of the site.

2. Financial Responsibility Account. If a release from a regulated storage tank system causes contamination to a third party site, the third party may file a court action against any and all owner/operators and the surface owner of the site. If the court awards a settlement to the third party, the state pays the first \$1 million dollars of the damages awarded by the court. The state will then collect the \$30,000 deductible from the registered owner of the site. Any court-awarded amounts exceeding \$1 million are the responsibility of the tank owner. Legal costs incurred by the third party are **not** covered by this account, and the state does not provide legal representation to the owner. Tank owner/operators are required to submit a certificate of insurance if they have an insurance policy in effect that: 1) covers any part of the cost of cleaning up a release, or 2) provides any liability protection for them. They are **not required** to have an insurance policy if they are participating in the STP. Federal rules found in 40 CFR 280.93(b)(2) require owner/operators of more than 100 tanks to have \$2,000,000 in financial responsibility. The corrective action account does not provide that protection.

Available Information

The department is available to discuss the compliance status of any regulated storage tank facility and/or contaminated site. Detailed questions concerning site contamination problems or active remediation status may be addressed to the WDEQ/SHWD/STP office in the district where the facility is located. District office contacts are shown on the following page.

WDEQ information concerning the state STP can be found on the department's website at <http://deq.state.wy.us/shwd/stp/>.



www.inberg-miller.com

124 East Main Street
Riverton, WY 82501
307-856-8136
307-856-3851 (fax)
riverton@inberg-miller.com

1120 East "C" Street
Casper, WY 82601
307-577-0806
307-472-4402 (fax)
casper@inberg-miller.com

350 Parsley Boulevard
Cheyenne, WY 82007
307-635-6827
307-635-2713 (fax)
cheyenne@inberg-miller.com

193 W. Flaming Gorge Way
Green River, WY 82935
307-875-4394
307-875-4395 (fax)
greenriver@inberg-miller.com

830 E. Richards Suite #1
Douglas, WY 82633
307-359-7000
307-460-7600 (fax)
ctwiford@inberg-miller.com