



Environmental Assessment Guidelines for Portfolio Loans

Revised 1/1/2012

The written environmental assessment of the loan security is to be addressed and certified to the Lender. No work is to commence until the firm conducting the review has been approved by the Lender. The report is to conform to the current ASTM guidelines and the Lender's guidelines. Lender shall receive one hard copy and one electronic copy of the report.

In the performance of the assessment the environmental assessment shall include:

I. Site's Physical Characteristics

- A. General description of the property and improvements, referencing SCS soil surveys, hydrogeological surveys, USGS quad maps, and FEMA floodplain maps.
- B. Determine the local domestic water supply and describe sewage (including septic systems, leaching ponds, waste removal, etc.) and sanitary systems of the facility. If potable water is provided by a well, the engineer shall include test results, from the responsible testing authority, for the past three years.
- C. Assess the property for presence of above ground or underground storage tanks.

II. Site History

- A. Review available topographic maps, geotechnical and geologic information, historical maps (e.g., Sanborn maps) and historical aerial photographs of the property, and comment on all significant findings and observations.
- B. Include the historical zoning progressions for the property.
- C. Include interview with owners, occupants and government officials.
- D. Previous environmental assessments, including any prior soil, water or air sampling and inspections of underground storage tanks. Include a copy of the previous report.
- E. Review the past site use to identify activities that may pose an environmental risk to the property to include information from city directories.

III. Site Inspection

- A. Review current site use and tenant activities to identify activities that may pose an environmental risk to the property. This review shall include tenant housekeeping practices

as well.

- B. Review all waste disposal practices at the property.
- C. Identify any hazardous materials used or stored on-site, including quantity, location, storage and handling methods, MSDS, and necessary permits.
- D. Identify neighboring sites, including site uses, tenant activities and hazardous materials, if possible.

IV. **Database Searches**

- A. Review and include Federal, State and local environmental record sources for known potential sources of contamination. Record sources search distances should follow ASTM guidelines, at a minimum, and include NPL, CERCLIS, RCRIS, ERNS, State hazardous waste sites, state landfills, registered UST's and leaking UST's.
- B. List type and extent of remediation, if any, for the listed sites.
- C. Database searches should be completed through Environmental Data Resources, Inc. (EDR) or Environmental FirstSearch and copies of the report should be appended in the assessment.

V. **Asbestos Containing Materials**

- A. Conduct a visual inspection in the building and document the presence and extent of suspect ACM. If suspect ACM are found, provide a proposed scope of services and fee estimate to investigate and characterize the extent of ACM in accordance with the guidelines of:
 - The Environmental protection Agency (EPA) National Emissions Standards for Hazardous Air Pollutants (NESHAPS) (40CFR Part 61)
 - The Asbestos Hazard Emergency Response Act (AHERA) (40CFR Part 763)
 - The Occupational Safety and Health Administration (OSHA) (40 CFR 1926, 1101) and
 - Any applicable state or local regulations

VI. **Lead Based Paint**

- A. Comment on the presence or likeliness of lead based paint.

VII. **Polychlorinated Biphenyl (PCB)**

- A. Observe the local power company transformers on the property, confirm ownership and inspect for leaks and presence of polychlorinated biphenyls (PCBs). Solicit utility company response regarding presence of PCBs. Observe privately owned transformers and capacitors for leaks and assess presence of PCBs. Determine if local power company is responsible for any contamination and clean up of their equipment.

VIII. **Radon**

- A. Review available information to assess occurrence of radon in the area. If requested by Lender, a limited number of activated carbon radon canister tests will be performed to

determine site radon conditions.

IX. **Mold**

- A. Conduct a visual inspection in the building and document obvious indications of the presence and extent of mold in accessible, occupied areas of the building.

X. **Remediation**

- A. If additional investigation is recommended regarding any of the REC's identified in the ESA report, or any of the other Non-Scope Considerations listed above, in a separate cover letter, submit the recommended scope of services and fee estimate for such services and recommendations for operation and maintenance programs.