Grand Isle (GNI) NON-DIRECTIONAL BEACON (NDB)

JEFFERSON PARISH, LOUISIANA

Phase I Environmental Due Diligence Audit

Prepared For:

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1.0 SUMMARY

Lockheed Martin (NISC III), in support of the Federal Aviation Administration (FAA), presents this Phase I Environmental Due Diligence Audit (EDDA) report for the former GNI (Grand Isle) NDB (Non Directional Beacon) located at FAA Road, Grand Isle, LA 70358. The former GNI NDB has been decommissioned and was located on a parcel of approximately 34 acres. GNI NDB hereafter referred to as the "Subject Property" for the purposes of this report. This parcel and any buildings, structures, and improvements on the parcel are hereafter referred to as the "Subject Property" for the purposes of this report. The Subject Property is owned by the United States of America (i.e., the federal government) and administered by the FAA.

Records were obtained from various agencies to gather historical information and documentation pertaining to potential environmental liabilities associated with the subject and surrounding properties. A database search of federal and state environmental records was performed to determine if neighboring or adjacent properties have the potential to adversely affect the Subject Property. Interviews and a site reconnaissance were performed to assess the history and condition of the Subject Property. On April 11, 2013 the Louisiana Department of Natural Resources (LADNR), Office of Coastal Management, issued a Coastal Zone Consistency Document C20130018 to the FAA, pertaining to the wetlands in areas affected by the collapsed 300 foot antenna. All regrowth conditions of the wetlands were met and the document closed on November 06, 2014.

This report serves as documentation of a Phase I EDDA for the Subject Property. The purpose of this audit is to exercise due diligence by evaluating potential environmental liabilities associated with the Subject Property. This audit was performed in accordance with ASTM Standard E1527-13 and FAA Order 1050.19B. A discussion of findings associated with the Subject Property is provided in Section 8.0 of this report. This Phase I EDDA has revealed no recognized environmental conditions (as defined by ASTM Standard E 1527-13) in connection with the Subject Property.

2.0 INTRODUCTION

The Subject Property has been decommissioned and is excess real property. Due to the anticipated real property disposition, the FAA Facility Disposition Program requested a Phase I EDDA to be performed for the Subject Property.

2.1 Purpose

The purpose of this Phase I EDDA is to identify, to the extent feasible and subject to the limitations discussed in this report, recognized environmental conditions and historical recognized environmental conditions related to the Subject Property. According to ASTM E1527-13, the term "recognized environmental conditions" is defined as follows:

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

This report serves as documentation of a Phase I EDDA for the Subject Property. The purpose of this audit is to exercise due diligence by evaluating potential environmental liabilities associated with the Subject Property. This audit was performed in accordance with the guidelines set forth in FAA Order 1050.19B, Environmental Due Diligence Audits in the Conduct of FAA Real Property Transactions and ASTM E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

2.2 Detailed Scope of Services

A detailed site inspection was conducted on December 22, 2014. The site inspection consisted of a visual survey of property grounds and immediate surrounding areas to identify recognized environmental conditions. The purpose of the site inspection was to identify areas such as manufacturing and process areas; chemical storage areas; waste storage areas; suspected disposal areas; subsurface structures such as drains, sumps, septic systems, and tanks; fuel storage areas; electrical equipment which may contain polychlorinated biphenyls (PCB); evidence of historical uses; and evidence of spills or potential releases of hazardous substances such as stressed vegetation and soil staining. Records were obtained from various agencies to gather historical information and documentation pertaining to potential environmental liabilities associated with the Subject Property and surrounding properties. A database search of federal and state environmental records was performed to determine if neighboring or adjacent properties have the potential to adversely affect the Subject Property.

2.3 Significant Assumptions

Lockheed Martin (NISC III) is not aware of any significant assumptions.

2.4 Limitations and Exceptions

This Phase I EDDA was performed in accordance with the ASTM Standard E1527-13 and FAA Order 1050.19B. The methodologies contained in these standards and orders include, among other things, interviews with individuals familiar with the Subject Property, site inspection, and historical records review. Information obtained during the interviews and site inspection was recorded and reviewed before it was included in this Phase I EDDA report. All information that was obtained during the site investigation and subsequently included within this Phase I EDDA is assumed to be reliable. Not all such information, however, is susceptible to independent verification. Data from additional government databases was obtained and reviewed using accepted industry standards and practices. The conclusions summarized herein are based on the limited observations and review described within this submittal at the time the Phase I EDDA was conducted. Future events at the Subject Property or the surrounding properties may alter these findings.

Performing a Phase I EDDA in accordance with ASTM Standard E1527-13 and FAA Order 1050.19B is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with a property, and both practices recognize reasonable limits of time and cost.

2.5 Special Terms and Conditions

Lockheed Martin (NISC III) is not aware of any special terms or conditions.

2.6 User Reliance

Lockheed Martin (NISC III) is not aware of any user reliance issues.

3.0 SITE DESCRIPTION

The former GNI NDB was decommissioned in October 2010, and is located on approximately a 34 acre plot of land. The Subject Property is located on the west side of Elmer's Island Road and is approximately 53 miles south of New Orleans, Louisiana. The topography of the Subject Property is relatively flat and slopes slightly to the east. The Subject Property is immediately surrounded by wetlands and the Gulf of Mexico is approximately 1 mile to the southeast. Maps of the area are provided in Section 16.1.

3.1 Location and Legal Description

Location:

	Decimal	Degrees
Latitude (North):	29.189146	29° 11′ 20.92″
Longitude (West):	-90.072276	90° 4′ 20.19″
Elevation:	3 feet above sea level	

Legal Description:

Access Road

Starting at United States Coast and Geodetic Survey Triangulation Station "Thunder 1955"; thence on a bearing of S33°33'36"E for a distance of 915.78 feet to Point "E", said point being the point of beginning of the access road plot; thence on a bearing of N34.°00'E for a distance of 350.00 feet to Point "F"; thence on a bearing of N56°00'W for a distance of
1842.49 feet to Point "G"; thence on a bearing of N54°01'49E for a distance of 53.22 feet to Point "H"; thence on a bearing of S56°00'E for a distance of 1874.26 feet to Point "I" thence on a bearing of S34°00'W for a distance of 400.00 feet to Point "J"; thence on a bearing of N56°00'W for a distance of 50.00 feet to Point "E", said point being the point of beginning for the access road plot. The access road contains 2.563 acres, more or less.

Site Proper

Starting at United States Coast and Geodetic Survey U.S.C. and G.S. Triangulation Station "Thunder 1955"; thence on a bearing of S2° 27'34"E for a distance of 436.52 feet to Point "A", said point being the point of beginning of the facility plot; thence on a bearing of S56° 00'E for a distance of 1,220.00 feet to Point "B"; thence on a bearing for S34° 00'W for a distance of 1,220.00 feet to Point "C:; thence on a bearing of N56°00'W for a distance of 1,220.00 feet to Point "D"; thence on a bearing of W34° 00'E for a distance of 1,220.00 feet to Point "A", said point being the point of beginning of the facility plot. The facility plot contains 34.168 acres, more or less.

3.2 Site and Vicinity General Characteristics

The Subject Property is located in a rural setting off of Louisiana Highway 1 in the far southern portion of Jefferson Parish, Louisiana. According the National Wetlands Inventory, the Subject Property is surrounded by wetlands in all directions. The Subject Property is 53 miles south of Metropolitan New Orleans, LA.

3.3 Current Use of the Property

The Subject Property is vacant and is no longer used by the FAA.

3.4 Description of Structures, Roads, Other Improvements on the Site

The Subject Property is relatively flat and has an unpaved access drive that runs south west from Elmer's Island Road. The Subject Property has been cleared of all structures, buildings, antennas, and equipment except for the remaining support tie downs located on the northern and southern corners.

3.5 Current Uses of the Adjoining Properties

A review of topographic maps, aerial photographs, walk-through of the site, and interviews revealed that the majority of the areas immediately surrounding the Subject Property consist of residential camps. The following boxed text describes the areas located north, east, south, and west of the Subject Property.

Neighboring Properties	
North	Residential camps are on Louisiana Highway 1 approximately 0.4 miles north of the Subject Property.
East	Land to the immediate east of the Subject Property is currently vacant and has no use. Elmer's Island Road is located to the east of the Subject Property's access road.
South	A drainage pump station is located approximately 0.73 miles south-southwest of the Subject Property. The British Petroleum cleanup site is located on the coastline within approximately 0.5 miles south of the Subject Property.
West	Land to the immediate west of the Subject Property is currently vacant and has no use.

4.0 USER PROVIDED INFORMATION

The following sections describe the historical and present ownership of the Subject Property and its previous uses.

4.1 Title Documentation

According to the FAA CSA RECO, the Subject Property was originally leased during the late 1950's. The FAA acquired ownership in 1979. No property title was provided.

4.2 Environmental Liens or Activity and Use Limitations

There are no known environmental liens or activity and use limitations associated with the Subject Property.

4.3 Specialized Knowledge

A LADNR Consistency Determination Document was issued in anticipation of leaving the collapsed 300 foot antenna onto adjoining wetlands. However, the antenna was removed in January 2014. After a full growing season, from April 2014 to November 2014, regrowth of the wetlands where the collapsed 300 foot antenna existed was satisfactory and the LADNR's Consistency Determination Document #C20130018 closed. A copy of the Consistency Determination Document is available in Section 16.5.1.

4.4 Commonly Known or Reasonably Ascertainable Information

Records were obtained from various agencies to gather historical information and documentation pertaining to potential environmental liabilities associated with the subject and surrounding properties. A database search of federal and state environmental records was performed to determine if neighboring or adjacent properties have the potential to adversely affect the Subject Property. Interviews were conducted with FAA employees who are familiar with the Subject Property and adjacent property.

4.5 Valuation Reduction for Environmental Issues

It is unknown whether the Subject Property values have been reduced due to environmental issues on-site or on adjacent properties.

4.6 Owner, Property Manager, and Occupant Information

The Subject Property is owned by the United States of America and unoccupied. The GNI NDB was demolished on October 14, 2010. The 300 foot antenna was removed on January 29, 2014.

4.7 Reason for Performing Phase I

The FAA requested a Phase I EDDA based on the expectation to conduct disposition of the excess real property along with the collapsed 300 foot antenna. In addition, the paint on the antenna was tested for the presence of lead based paint. Analytical results indicated that the lead content in the remaining antenna paint was below the EPA and Louisiana Department of Environmental Quality standard for allowable content of lead in soil. The collapsed antenna was subsequently removed. After its removal, it was required by LADNR, that vegetation in the immediate surrounding areas regrow in satisfactory condition to close the Consistency Determination Document #C20130018.

4.8 Other

Not Applicable.

5.0 RECORDS REVIEW

Records were reviewed from various federal, state, and local agencies to obtain information on any potential environmental concerns that could impact the Subject Property. A discussion of the federal, state, and local records review is provided in the following sections. Refer to Section 16.5 for the Environmental Data Resources, Inc. (EDR), Report.

5.1 Standard Environmental Record Sources

Federal and State Records

Based upon the records review and interviews with personnel, no environmental concerns were identified with respect to the Subject Property. The findings from the information reviewed for this EDDA includes the following:

- No documented spills or hazardous materials response incidents at Subject Property.
- No hazardous waste generators on the Subject Property.

The databases listed below were among those searched by EDR for this EDDA. Detailed information contained in these databases and a complete list of all databases searched is included in the EDR Report in Section 16.5.

Database Search	Results
AST - Aboveground Storage Tanks	None
CERCLIS - Comprehensive Environmental Response, Compensation, and Liability Information System	None

Database Search	Results
CERCLIS NFRAP - No Further Remedial Action Planned	None
CORRACTS - RCRA Corrective Action Sites	None
ERNS - Emergency Response Notification System	None
FINDS - Facility Index Systems	None
FUDS - Formerly Used Defense Sites	None
HMIRS - Hazardous Materials Incident Report System	None
Institutional Controls / Engineering Controls Registries	None
LTANK - Leaking Tanks	None
LUST - Leaking Underground Fuel Storage Tanks	None
MLTS - Material Licensing Tracking System	None
NPL - National Priorities List	None
RCRA Generators - Resource Conservation and Recovery Act generators of hazardous waste	None
RCRA TSD - Treatment, Storage, and Disposal facilities	None
SHWS - State Hazardous Waste Sites	None
Solid Waste Facilities (SWF) Landfills, Incinerators, and Transfer Stations	None
Spills	None
TRIS - Toxic Chemical Release Inventory System	None
TSCA - Toxic Substances Control Act	None
UST - Underground Storage Tank	None

Orphan Sites

There are three orphan sites listed in the EDR Report. The locations of the three sites were not mapped due to poor or inadequate address information. With further research the location and conditions for each site was determined. The three sites are approximately within one mile from the Subject Property. Due to the proximity and status of this listed orphan site, it is determined to not present a risk to the Subject Property.

5.2 Additional Environmental Record Sources

Lockheed Martin (NISC III) reviewed pertinent local files and conducted interviews with FAA personnel. As detailed in Section 13.0, several references were used to determine the potential for environmental risk at the Subject Property.

Other information was compiled using Internet sources as described below.

National Wetlands Inventory and Flood Insurance Rate Maps

A wetlands map was obtained from the National Wetlands Inventory (NWI) website (http://wetlands.fws.gov/). Refer to Section 16.4.4 for the NWI map. A review of the NWI Map indicates that wetlands are located on the Subject Property and classified as:

- E2EM1N4 (Estuarine intertidal, emergent, persistent, regularly flooded, and plyhaline) wetland.

The Flood Insurance Rate Maps (FIRM) was obtained from the Federal Emergency Management Agency (FEMA) website, http://www.fema.gov/hazard/map/flood.shtm. According to the map (22051C0225E dated March 23, 1995), According to the map, the site lies within zone VE, which are areas determined to be coastal flood with velocity hazard (wave action); base flood elevations determined. The site is inside of a 100 year floodplain.

A review of information provided in the Natural Resource Conservation Web Soil Survey website, http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx, indicate the soils for the Subject Property consist primarily of mucky clay. Section 5.4 of this report provides a detailed discussion on the soils of the Subject Property.

5.3 Physical Setting Source(s)

The Subject Property is located off of Louisiana Highway 1 in Jefferson Parish. Properties immediately surrounding the Subject Property consist primarily of wetlands. According to the National Wetlands Inventory, the Subject Property is classified as wetlands. According to the general topographic information as provided in the EDR, groundwater flow is generally to the east of the Subject Property and slopes away from Elmer's Island Road. The unpaved, gravel FAA access road lies west of Elmer's Island Road.

See Section 16.4.3 for Historical Topographical Maps and 16.3 for Site Photos.

5.4 Historical Use Information on the Property

Prior to being developed the Subject Property had no use and remained as marsh swamp land. The FAA obtained and leased the Subject Property on or before July 1, 1977 and purchased it in 1982. The site was first developed and commissioned as the GNI NDB thereafter. Demolition and site restoration was completed in October 2010. The 300 foot antenna was subsequently removed in January of 2014.

Topographic Map Review

As a part of the investigation of the Subject Property, the U.S. Geological Survey (USGS) topographic maps for GNI NDB were obtained from EDR for the year 1892, 1932, 1957, 1979, and 1994. Copies of the topographic maps are provided in Section 16.4.3.

Topographic	Topographic Map Direction and Description	
Map Year	Direction	Description
1892	Subject Property	Subject Property appears relatively flat. No indication of development.
	North	Areas to the north are relatively flat and are marsh or swamp. Approximately 0.5 miles northeast of the Subject Property is residential development.
	East	Areas directly east are relatively flat and are marsh or swamp. Caminada Pass (Gulf of Mexico) is approximately 0.4 miles due east of the Subject Property.
	South	Areas directly south of the Subject Property are relatively flat and are marsh or swamp.
	West	Areas directly west of the Subject Property are relatively flat and are marsh or swamp land.
1932	Subject Property	Subject Property appears relatively flat. No indication of development.
	North	Areas to the north are relatively flat and are marsh or swamp. Louisiana Highway 1 appears further north.
	East	Areas directly east are relatively flat and are marsh or swamp. Caminada Pass (Gulf of Mexico) is approximately0.4 miles due east of the Subject Property.
	South	Areas directly south of the Subject Property are relatively flat and are marsh or swamp.
	West	Areas directly west of the Subject Property are relatively flat and are marsh or swamp land.
1957	Subject Property	Subject Property appears relatively flat. No indication of development.
	North	Areas to the north are relatively flat and are marsh or swamp. Light residential development is to the north. Louisiana Highway 1 appears further north. Elmer's Island Road is depicted to the northeast.
	East	Areas directly east are relatively flat and are marsh or swamp. Caminada Pass (Gulf of Mexico) is approximately0.4 miles due east of the Subject Property.
	South	Areas directly south of the Subject Property are relatively flat and are marsh or swamp.
	West	Areas directly west of the Subject Property are relatively flat and are marsh or swamp land.

Topographic	Topographic Map Direction and Description	
Map Year	**Direction**	**Description**
1979	Subject Property	Subject Property appears relatively flat and is labeled as "Tower."
	North	Areas to the north are relatively flat and are marsh or swamp. Residential development appears approximately 0.5 miles north of the Subject Property. Louisiana Highway 1 appears further north. Elmer's Island Road is depicted to the northeast.
	East	Areas directly east are relatively flat and are marsh or swamp. Caminada Pass (Gulf of Mexico) is approximately0.4 miles due east of the Subject Property.
	South	Areas directly south of the Subject Property are relatively flat and are marsh or swamp. Five unknown developments appear further southeast.
	West	Areas directly west of the Subject Property are relatively flat and are marsh or swamp land. Residential development appears further west.
1994	Subject Property	Subject Property appears relatively flat and is labeled as "Radio Tower."
	North	Areas to the north are relatively flat and are marsh or swamp. Increased residential development appears approximately 0.5 miles north of the Subject Property. Louisiana Highway 1 appears further north. Elmer's Island Road is depicted to the northeast.
	East	Areas directly east are relatively flat and are marsh or swamp. Caminada Pass (Gulf of Mexico) is approximately0.4 miles due east of the Subject Property.
	South	Areas directly south of the Subject Property are relatively flat and are marsh or swamp. Five unknown developments appear further southeast.
	West	Areas directly west of the Subject Property are relatively flat and are marsh or swamp land. Residential development appears further west.

Aerial Photography

As a part of the investigation of the Subject Property, historical aerial photographs were obtained from EDR for the years, 1971, 1973, 1982, 1989, 1993, 1995, 2005, 2007, 2009, and 2010. These aerial photographs of the Subject Property were reviewed to determine the historical land use of the Subject Property and the surrounding areas. A discussion of the information extracted from the aerial photography is provided in the following table. Refer to Section 16.4.2 for reproductions of the aerial photographs.

Aerial	Aerial Photograph Direction and Description	
Year	**Direction**	**Description**
1971	Subject Property	Subject Property has been developed. Access road and cleared area is evident.
	North	Marsh land is immediately north. A series of residential dwellings are evident along HWY 1 approximately 0.5 miles north.
	East	Marsh land is to the east and Elmer's Island Road is evident.
	South	Marsh land and Pump Station Road is evident. Unknown development appears further southeast.
	West	Marsh land is to the west.
1973	Subject Property	Subject Property has been developed. Access road and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.
1982	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.

Aerial	Aerial Photograph Direction and Description	
Year	**Direction**	**Description**
1989	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.
1993	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.
1995	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.
2005	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.

Aerial	Aerial Photograph Direction and Description	
Year	**Direction**	**Description**
2007	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.
2009	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.
2010	Subject Property	Subject Property has been developed. Access roads and cleared area is evident.
	North	Directly and further north appear unchanged since 1971.
	East	Directly and further east appear unchanged since 1971.
	South	Directly and further south appear unchanged since 1971.
	West	Directly and further west appear unchanged since 1971.

Soil Survey Review

The GNI NDB is located entirely on the following soil:

- Soil Component Name: Scatlake Muck
- Depth to Water table Min: 6 inches
- Depth to Bedrock Min: > 84 inches
- Corrosion Potential - Uncoated Steel: High
- Hydric Status: Hydric 2B3, 3, 4: Soil is Aquic suborder (2), Poorly drained (B), water table at a depth of 1.0 foot or less during the growing season if permeability is less than 6.0 in/hr in any layer within a depth of 20 inches (3), Soils are frequently ponded for long or very long duration during the growing season (3), Soils are flooded for long or very long duration during the growing season (4).
- Soil Drainage Class: Very poorly drained
- Hydrologic Group: D-Very Slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer.
- Soil Surface Texture: Mucky clay

See EDR Radius Report, Physical Setting Summary, for complete soil survey report.

5.5 Historical Use Information on Adjoining Properties

Adjoining properties have been used for fishing and camping.

6.0 SITE RECONNAISSANCE

On December 22, 2014, Lockheed Martin (NISC III) conducted a site inspection of the Subject Property and adjacent properties to determine their environmental condition. See Section 16.3 to review the site inspection photographs. The following sections are based on observations made by Lockheed Martin (NISC III) during the site inspection.

6.1 Methodology and Limiting Conditions

Lockheed Martin (NISC III) contacted Mr. Valdrie L. Buford, former MSY System Support Center (SSC) Manager to schedule the site inspection. Access to the Subject Property is unrestricted and an escort was not necessary for the site inspection.

Photographs taken during the site inspection provided in Section 16.3.

6.2 General Site Setting

The Subject Property is located in a wetlands and surrounding property is currently unused except for areas directly to the north which consist of residential properties. The Gulf of Mexico is to the east.

6.3 External Observations

The tie downs for the 300 foot antenna appear to still remain on the north, south, and west portions of the Subject Property. All vegetation and small turnaround areas covered in sea shells and gravel were unstained. The vegetation (grass, small shrubs, and wetland vegetation) were all regrown and in healthy condition, specifically for areas where the collapsed 300 foot antenna had been located prior to removal. The site visit did not identify any manufacturing and process areas; chemical storage areas; waste storage areas; suspected disposal areas; subsurface structures such as drains, sumps, septic systems, and tanks; fuel storage areas; electrical equipment which may contain polychlorinated biphenyl's (PCBs); evidence of historical uses; and evidence of spills or potential releases of hazardous substances such as stressed vegetation and soil staining other than what is detailed in Section. 6.2.

A site plan is provided in Section 16.2 and photographs of the Subject Property are provided in Section 16.3.

6.4 Interior Observations

The Subject Property contains no structures with interiors. Interior observations are not applicable. The inventory of structures and equipment that was previously located on the Subject Property is outlined in the Parsons *Site Survey Report.*

Photographs of the Subject Property are provided in Section 16.3.

7.0 INTERVIEWS

7.1 Interview with Owner

FAA Central Service Area (CSA) Real Estate Contracting Officer (RECO), Jana Blanco, was not aware of any changes to the Subject Property since the initial Phase I EDDA conducted in 2010. No lease or title documents were provided.

7.2 Interview with Site Manager

Prior to the site reconnaissance, SSC Manager, Valdrie L. Buford, was contacted via email by NISC III to inform him of the site visit date and was provided with information for the close out of the Consistency Determination Document from the Louisiana Department of Natural Resources.

7.3 Interviews with Occupants

There are no occupants as the site has been decommissioned and the Subject Property was never a staffed facility.

7.4 Interviews with Local Government Officials

Research and investigation efforts provided information required for this Phase I. Therefore, no interviews with state or local officials were deemed necessary.

7.5 Interviews with Others

Parsons Construction Supervisor, Andrew Fotina, provided NISC III with email correspondence from Jeff Harris with the Louisiana Department of Natural Resources. Mr. Harris indicated that after inspection of the Subject Property, the LADNR was satisfied with the plant regrowth after one full growing season, from April to November 2014, therefore closing out the Consistency Determination Documentation.

8.0 FINDINGS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of the applicable ASTM Standard E1527-13 and FAA Order 1050.19B, of the former GNI NDB, located in Jefferson Parish on Grand Isle, Louisiana.

The antenna was collapsed since 2003. In January of 2012, as part of the FAA Environmental Cleanup Program, Booz Allen Hamilton conducted lead sampling and analysis of paint chips on the antenna and of the surrounding soil. Based on the analytical results, no further investigation or remedial action was recommended. The antenna was then removed by Parsons in January of 2014. Tie down supports for the antenna remain on the north, south, and west portions of the Subject Property.

As detailed in Section 5.1, the surrounding orphan sites listed in the EDR Report from the database search likely do not present a risk to the Subject Property.

No findings indicating any potential recognized environmental conditions were noted.

9.0 OPINIONS

The site inspection, interviews, and records review did not reveal any recognized environmental conditions in connection with the Subject Property. There is no indication that FAA activities on the Subject Property have contributed to any environmental concerns on adjacent properties. Furthermore, there is no indication that operations and conditions on adjacent properties have caused any adverse environmental effects to the Subject Property.

10.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Standard E1527-13 and FAA Order 1050.19B, of the former GNI NDB, located in Grand Isle, Louisiana. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. As described in Section 8.0, this assessment has revealed no recognized environmental conditions in connection with the Subject Property.

11.0 DEVIATIONS

This Phase I EDDA was performed with no deletions or deviations from ASTM Standard E1527-13 and FAA Order 1050.19B, except as specified in Section 12.0.

12.0 ADDITIONAL SERVICES

12.1 Asbestos

No sampling for asbestos was done as part of this Phase I EDDA.

12.2 Lead

No sampling for lead was done as part of this Phase I EDDA refresher. However, according to the GNI NDB Sampling Report from April 2012, the FAA requested NISC III staff in 2011 to have the remaining paint on and random soil samples adjacent to the collapsed antenna sampled in anticipation of leaving it in place to support consistency determination for the Louisiana Coastal Resources Program. The analytical results indicated that the lead content in the antenna paint falls below the EPA and Louisiana Department of Environmental Quality standard for allowable content of lead in soil and the ecological risker were low. The GNI NDB Sampling Report April 2012 can be obtained by contacting NISC III Environmental Professionals listed in Section 16.6.

12.3 Radon

No sampling for radon was done as part of this Phase I EDDA. The Federal EPA Radon Zone for Louisiana is listed as 3 for Radon prevalence. Zone 3 parishes/counties have a predicted average indoor radon screening level less than 2 picocuries per liter (pCi/L) yellow zones, which are interpreted by EPA to be a "Low Potential Risk" for radon exposure.

12.4 Historic Value

The National Historic Preservation Act (NHPA), as amended in 16 United States Code (USC) 470, is the fundamental law for the protection, rehabilitation, restoration and reconstruction of cultural resources. Section 106 of this Act requires that federal agencies take measures to protect properties eligible for or included in the National Register of Historic Places (NRHP). Other statutes, such as the Archaeological Resources Protection Act (16 USC 470aa-470ii); protect non-structural properties of historic importance. Research indicates that the Subject Property does not contain any structures or areas that qualify for protection as related to the above-referenced statutes. During the site inspection, no such NRHP sites were observed. A review of the NRHP did not reveal any information to suggest that the Subject Property would be covered under the above-referenced statutes.

13.0 REFERENCES

ASTM International, *ASTM E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, West Conshohocken, Pennsylvania, November 2013.

Environmental Data Resources, Inc. *EDR Radius Map Report with GeoCheck*, Inquiry Number 4133968.2s 5787.2s, November 13, 2014.

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The information regarding federally-regulated facility compliance history was obtained from the EPA ECHO website: http://echo.epa.gov.

The information regarding radon zone was obtained from the EPA website: http://www.epa.gov/radon/zonemap.html.

The FIRM was reviewed at the FEMA website: https://msc.fema.gov/.

The NWI map was obtained from the National Wetlands Inventory website: http://wetlands.fws.gov.

The Custom Soil Resource Report was obtained from the Natural Resource Conservation Service Web Soil Survey website: http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

The information regarding historic resources was obtained from the NRHP website: http://www.nps.gov/nr/.

Information regarding the lead sampling and analysis of the collapsed antenna was obtained from *NISC III GNI NDB Sampling Report*. April 13, 2012.

14.0 SIGNATURE OF ENVIRONMENTAL PROFESSIONALS

This Phase I EDDA was performed in accordance with ASTM Standard E1527-13 and FAA Order 1050.19B. The methodologies contained in these standards and orders include, among other things, interviews with individuals familiar with the Subject Property, site inspection and historical records review. Information obtained during the interviews and site inspection was recorded and reviewed before being included in this Phase I EDDA report. All information obtained during the site investigation and subsequently included within the Phase I EDDA is assumed to be reliable. The purpose of this investigation is to provide FAA with information regarding any existing or potential environmental concerns on or surrounding the audit site. The following signature attests to these statements:

Lucas Hornsby, Lockheed Martin Corporation (NISC III)	February10, 2014 Date:
Giselle Sylvester, Lockheed Martin Corporation (NISC III)	February10, 2014 Date:

15.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professionals as defined in §312.10 of 40 CFR 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 have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.