
Phase I Environmental Site Assessment

Salinas PV Site B
State Road PR-706 KM 2.3
Barrio Aguirre,
Salinas, Puerto Rico 00704

Prepared for:
Clean Flexible Energy, LLC

Prepared by:



June 2021

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1 Summary

Clean Flexible Energy, LLC (the Client) retained the services of PMG & Associates, LLC (PMG) to carry out a Phase I Environmental Site Assessment (ESA) at a parcel of land located at PR-706 KM 2.3 in Barrio Aguirre of the Municipality of Salinas and Barrio Jobos in the Municipality of Guayama (see **Figure 1. Site Location Map**). The Phase I ESA was limited to a portion of the property area, referred to Site B (the Property or subject Site). The subject Site consists of an area of approximately 533 acres (549 cuerdas) within a tract of land located between Highway PR-53 and PR-3. Clean Flexible Energy is planning to develop a photovoltaic energy project in the area. The Property is subject to a due diligence process pursuant to the lease of the Property and the required environmental studies prior to the development of the proposed energy project.

The purpose of this Phase I ESA is to conduct an environmental due diligence inquiry pursuant to good commercial and customary practice, as established by the procedures stated in the ASTM Standard Practice E1527-13. The goal of the practice is to identify, to the extent feasible pursuant to the processes established, recognized environmental conditions (REC). The term recognized environmental conditions means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property:(1) due to any 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* conditions¹ are not recognized environmental conditions.

The study area subject to this Phase I ESA (Site A) consists of an area of approximately 533 acres (549 cuerdas) located within eight contiguous land parcels owned by Agriart, LLC. The site is located within farmland. The main Property area is bounded to the north by the Guamaní Irrigation Channel and State Highway PR-53; to the east by El Legado Golf Course and Villodas Community; to the south by State Road PR-3 and the San Felipe and Chún Chin Communities; to the west by State Road PR-706, idle agricultural fields, a state penitentiary, and residential and commercial areas.

Most of the study area (Site B) is currently vacant. Some portions of the study area and adjoining areas are currently leased for agricultural purposes (about 600 cuerdas of alfalfa and soya seeds

¹ A condition that generally does not present a threat to human health or the environment and that generally would not be subject of an enforcement action if brought to the attention of appropriate governmental agencies.

production). The previous owner, Mycogen Seeds operated a Research & Development and Parent Seed Facility at the Property until 2019-2020. State road PR-706 provides direct access to the site. The main access routes connecting to PR-706 are PR-3 to the south and Highway PR-53 to the north. The general property area is occupied by the former Mycogen Research and Development and Parental Seeds Facility. The former Mycogen facilities are located into two distinct areas within the property, one at the north-west property quadrant and the second one near the center of the property. The site is subject to PREPA right of way along both sides of the channels. Multiple water wells were observed throughout the property area. There are four water storage tanks at the top of one of the hills located in the north side of the property area. Other improvements in the area include storm water management systems and electrical utilities. The property area is fenced.

The findings of this assessment and professional opinion of its impact on the Property are:

1) **Environmental Database Records Review** - Federal and state databases were reviewed for records regarding possible hazardous material handling, spills, storage, production, or remediation at the Property or in the vicinity areas of the Property that could constitute a recognized environmental condition (REC). The Property was not listed in any of the databases searched. One (1) site/facility within the radius search from the Property were identified in the environmental records reviewed.

a) GPR # 1301 (UST Facility ID: 91-0102) (Carr. 3 KM 149.9) – Gas service station located at PR-3 south from the Property (at relatively lower elevation). The facility is listed in the PREQB Inactive Leaking Underground Storage Tanks List (LUST list).

Opinion: Downgradient facility with reported leaking from an underground storage tank (UST) in 2005. The facility is listed in the inactive LUST list indicative that closure activities at the site has been completed in conformance with state regulation. The facility has not been listed in any other environmental record or subject to corrective action. Given the nature of this finding and its location with respect the subject Property, it is unlikely that this finding has affected, or it is likely to affect the subject Property or Site. As such, this instance has been dismissed as a REC in connection with the Property.

2) **Historical Use Information Sources** - According to historical use information reviewed, the subject property has been historically used for agricultural purposes (crops, cattle grazing, and dairy production). During the 19th century and most of the 20th century, the area under

study was dedicated to sugar cane production. The subject Property has been used for cattle grazing and dairy production. In 2014, a Research and Development and Parental Seed facility (agro-industrial) was developed on the property.

Opinion: The subject Property has been historically used for agricultural purposes. There is a potential that agricultural chemicals, such as pesticides, herbicides, fungicides, and fertilizers, used onsite have impacted the subject Property. There is no evidence of pesticides discharge, dumping or spill have occurred. The use of farm-related vehicles, heavy equipment or machinery may have resulted in minor leaks of oils and other petroleum products. These instances are considered *de minimis* conditions not a REC. Historical use information sources reviewed have not revealed any suspect recognized environmental conditions in connection with the Property.

- 3) **Site Reconnaissance** - No conditions indicative of recognized environmental conditions in connection with the Site were identified during the site reconnaissance.
- 4) **Interviews** - Based on the information obtained during the interview component of this assessment, no known or suspect recognized environmental conditions were identified in connection with the Property.

PMG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E-1527-13 of tract of land (Site B) of approximately 533 acres located in a Property at state road PR-706 KM 2.3 in Barrio Aguirre of the Municipality of Salinas and Barrio Jobos of the Municipality of Guayama in the South Region of Puerto Rico. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. **This assessment has revealed no evidence of recognized environmental conditions (REC) in connection with the Property**

2 Introduction

Clean Flexible Energy, LLC (the Client) retained the services of PMG & Associates, LLC (PMG) to carry out a Phase I Environmental Site Assessment (ESA) at a parcel of land located at PR-706 KM 2.3 in Barrio Aguirre of the Municipality of Salinas and Barrio Jobos in the Municipality of Guayama (see **Figure 1. Site Location Map**). The Phase I ESA was limited to a portion of the property area, referred to Site B (the Property or subject Site). The subject Site consists of an area of approximately 533 acres (549 cuerdas) within a tract of land located between Highway PR-53 and PR-3. Clean Flexible Energy is planning to develop a photovoltaic energy project in the area. The Property is subject to a due diligence process pursuant to the lease of the Property and the required environmental studies prior to the development of the proposed energy project.

This report describes the services performed, the findings of the investigation, and the environmental professional's interpretation of the results of this Phase I Environmental Site Assessment in accordance with the American Society for Testing Materials (ASTM) Standard Practice E1527-13 (*Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*).

2.1 Purpose

The purpose of this Phase I ESA is to conduct an environmental due diligence inquiry pursuant to good commercial and customary practice, as established by the procedures stated in the ASTM Standard Practice E1527-13. The purpose of this practice is to meet the "all appropriate inquiry" requirement of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) and petroleum products. As such, this practice is intended to permit a user to satisfy one of the requirements to qualify for the *innocent landowner, contiguous property owner, or bona fide prospective purchaser* limitations on CERCLA liability, also known as, the "landowner liability protections or LLPs": that is, the practice that constitutes "all appropriate inquiry into the previous ownership and uses of the property consistent with good commercial or customary practice" as defined at 42 U.S.C. §9601(35) (B). Controlled substances are not included within the scope of this standard practice.

The goal of the practice is to identify, to the extent feasible pursuant to the processes established, recognized environmental conditions (REC). The term recognized environmental conditions means the presence or likely presence of any hazardous substances or petroleum products in,

on, or at a property:(1) due to any 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* conditions² are not recognized environmental conditions.

2.2 Detailed Scope of Work

The scope of this effort was to conduct a Phase I ESA of the subject site in general accordance with the ASTM Standard Practice E 1527-13, except as otherwise stated herein. The environmental professional reviewed selected public records and historical information in connection with the Property and adjacent properties, performed a visual assessment of the site, interviewed individuals knowledgeable of the uses and physical characteristics of the Property and of the general area where the Property is located, and summarizes in this report all of the information obtained.

2.3 Significant Assumptions

The accuracy and completeness of record information varies depending on the source. Therefore, unless PMG has actual knowledge that certain information is incorrect, or unless it is obvious that certain information is incorrect in light of other information obtained by PMG at the time of this assessment, PMG will assume that the information provided by others for consideration as part of this assessment is correct. PMG may rely on such information, as appropriate, for the purpose of determining any findings, opinions, or conclusions as part of this Phase I ESA.

2.4 Limitations and Exceptions

A Phase I ESA cannot wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with the Property. Performance of a Phase I ESA in accordance with the ASTM Standard Practice E1527-13 is intended to reduce, but not eliminate, uncertainty regarding the potential for recognized environmental conditions in connection with the Property, recognizing reasonable limits of time and costs. PMG does not warrant that documents, records, interviews or reports prepared or carried out by others, not under the direction of PMG, that were used to determine the findings, opinions, or conclusions of the Phase I ESA are accurate or up to date.

² A condition that generally does not present a threat to human health or the environment and that generally would not be subject of an enforcement action if brought to the attention of appropriate governmental agencies.

This Phase I ESA covered an area of approximately 454 acres where the PV project is proposed in accordance with the project layout provided by the Client. The scope of this Phase I ESA does not include the total property area occupied nor the interior of existing buildings and/or structures at the Property.

This Phase I ESA was conducted in accordance with the ASTM Standard Practice E 1527-13. This Phase I ESA did not involve any testing or sampling; therefore, PMG will not be responsible for latent environmental conditions which are not obvious during the assessment and come to light sometime after the assessment is completed.

2.5 Special Terms and Conditions

This report has been prepared on behalf of and for the exclusive use of the Client for the purpose described in the introduction to this report. This report and the findings, conclusions, observations, specifications, or data contained in it shall not, in whole or in part, be disseminated or conveyed to any other party nor used by any other party without the express written consent from PMG. However, PMG recognizes that the Client may convey this report to any party providing financing to the Client with respect to the Property or future development and operation on the Property by the Client. Any person providing such financing, or acting on behalf of any such party or in connection with such financing, its successor's assignees and participants as well as its advisors and representatives, may rely on this Phase I ESA report.

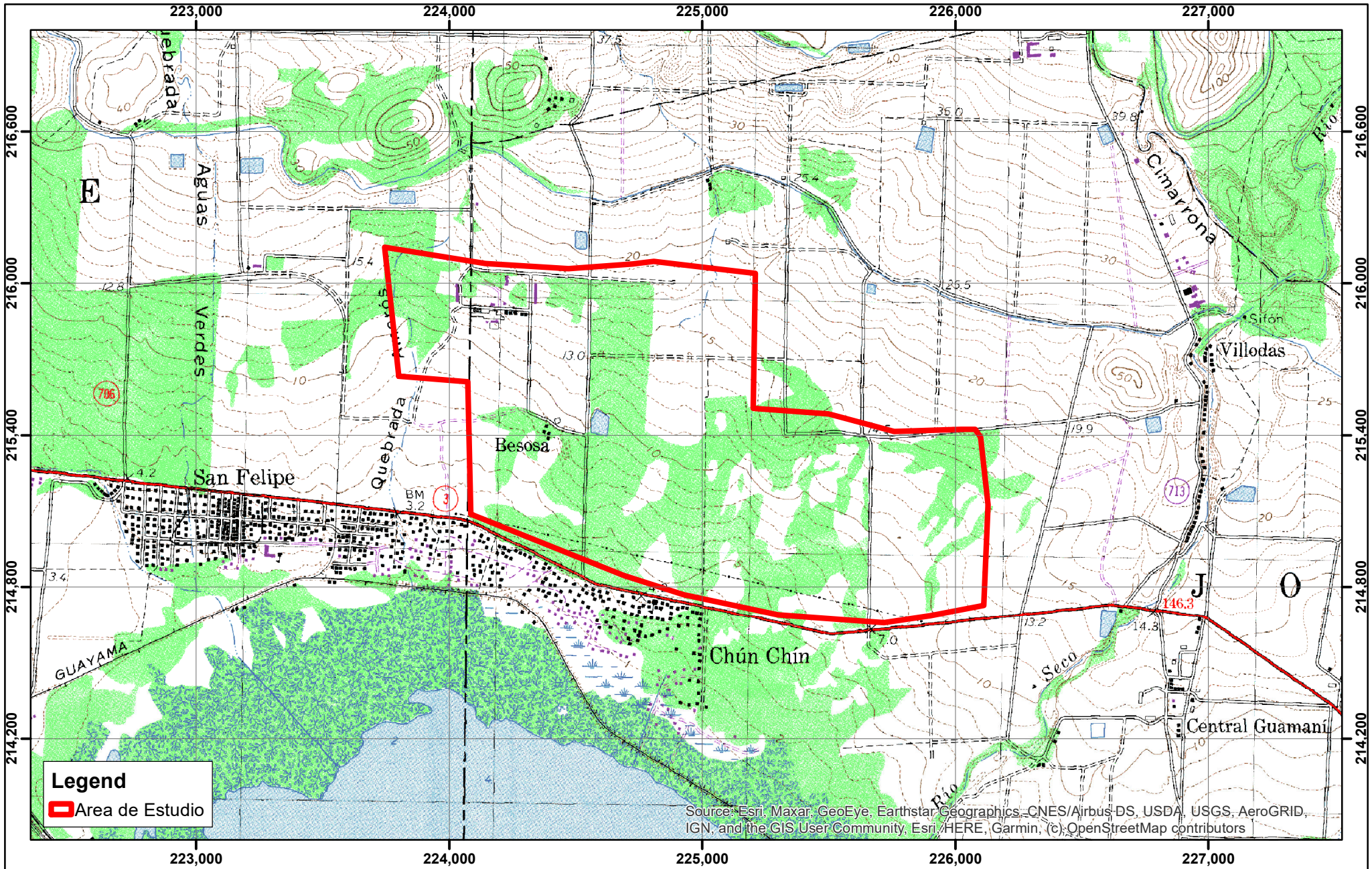
2.6 User Reliance

This Phase I ESA was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area. PMG observed the degree of care and skill generally exercised by other consultants under similar circumstances and conditions. PMG's findings and conclusions must be considered not as scientific certainties, but rather as our professional opinion concerning the significance of the limited data gathered during the course of the Phase I ESA. No other warranty, express or implied, is made. Specifically, PMG does not and cannot represent that the property subject to this Phase I ESA contains no hazardous substances or petroleum products, as defined in the ASTM Standard Practice E 1527-13, or other latent condition beyond that observed by PMG during this assessment.

Consistent with the ASTM Standard Practice E 1527-13, the records search performed for this Phase I ESA was limited to reasonably ascertainable information; that is, information that is:

- Publicly available,
- obtainable from its source within reasonable time and cost constraints, and
- practically verifiable.

Observations made during the Property and vicinity reconnaissance were limited to those obvious visual and physical (that is, by sense of smell) observations made while walking through the Property or driving through the immediate vicinity of the Property.



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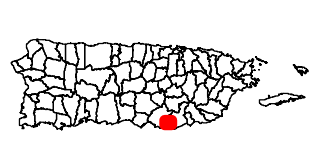


Figure 1. Site Location Map

Salinas PV Site B



Date: 4/5/2021



3 Site Description

3.1 Location

The Property area is located at state road PR-706 KM 2.3 in Barrio Aguirre of the Municipality of Salinas and barrio Jobos in the Municipality of Guayama in the South Region of Puerto Rico. The Property is bordered to the north by Highway PR-53 and to the south by PR-3. The study area subject to this Phase I ESA (Site B) consists of an area of approximately 533 acres (549 cuerdas) located within eight contiguous land parcels owned by Agriart, LLC. (**Figure 2. Aerial Photo**).

Parcel ID	Cadastral Number	Property #	Area (Cuerdas)	Coordinates
Parcel 2	418-000-009-12-000	13887	123.42	17.975, -66.208
Parcel 3	418-000-009-13-000	20072	271.16	17.976, -66.202
Parcel 4	418-000-010-43-000	20193	156.00	17.977, -66.195
Parcel 5	419-000-006-29-000	22703	202.88	17.969, -66.186
Parcel Florida	418-000-009-06-901	12054	84.74	17.969, -66.202
Parcel Benito A	418-000-010-01-901	12287	43.05	17.969, -66.196
Parcel Benito B	418-000-010-04-000	12288	43.05	17.969, -66.194
Parcel Benito C	418-000-010-05-000	12289	43.05	17.969, -66.192

3.2 Legal Description

The parcels are owned by Agriart, LLC. The total property area consists of twelve (12) contiguous land parcels or plots, of which the subject Site (Site B) will occupy portions of eight (8) parcels. Title deeds and land survey plan are included in **Appendix A**. Legal descriptions of the eight (8) parcels follows:

-----B. Parcel 2. -----

"RÚSTICA: Barrio Aguirre del término Municipal de Salinas, Puerto Rico. Solar Dos (2). Cabida: cuatrocientos ochenta y cinco mil ciento uno punto dos mil ciento noventa y uno (485,101.2191) metros cuadrados. En lindes por el NORTE, con canal de riego (AEE) Patillas; por el SUR, con Carretera Estatal PR-3; por el ESTE, con la Parcela Tres (3) formada por la agrupación de las parcelas FS-1, FS-2, FS-4, FS-5, FS-6, FS-7, FS-8, FS-9 y FS-Remanente y con terrenos de Desarrollos MCP, Inc.;

y por el OESTE, con la Parcela Uno (1) formada por la agrupación de las parcelas AO-1, AO-2, AO-3, AO-4, AO-5 y AO-6, con cabida equivalente a ciento veintitrés punto cuatro dos tres (123.423) cuerdas." -----

-----C. Parcel 3. -----

"RÚSTICA: Predio de terreno de topografía semillana y forma irregular, identificada como Parcela Tres (3), radicada en el Barrio Jobos del Municipio de Guayama, Puerto Rico, con un área de DOSCIENTOS SETENTA Y UNO PUNTO UNO CINCO SEIS (271.156) CUERDAS, equivalentes a un millón sesenta y dos mil setecientos dieciséis punto ocho mil setecientos sesenta y ocho (1,062,716.8768) metros cuadrados. En lindes por el NORTE, con canal de riego (AEE) Patillas; por el SUR, con terrenos de Desarrollos MCP Inc.; por el ESTE, con la Parcela Cuatro (4) formada por la agrupación de las parcelas BL-8, BL-9, BL-15, BL-16, BL-17 y BL-18 y con terrenos de Margarita M. Benito Minondo; y por el OESTE, con la Parcela Dos (2) formada por la agrupación de las parcelas AE-1, AE-2, AE-3 y AE-4." -----

-----D. Parcel 4. -----

"RÚSTICA: Predio de terreno de topografía semillana y forma irregular, identificada como Parcela Cuatro (4), radicada en el Barrio Jobos del Municipio de Guayama, Puerto Rico, con un área de CIENTO CINCUENTA Y SEIS (156) CUERDAS, equivalentes a seiscientos trece mil ciento cuarenta y uno punto siete mil ciento setenta y ocho (613,141.7178) metros cuadrados. En lindes por el NORTE, con canal de riego (AEE) Patillas; por el SUR, con terrenos de Margarita M. Benito Minondo, Alma B. Benito Minondo y Nereida Benito Minondo; por el ESTE, con la Parcela Seis (6) formada por la agrupación de las parcelas BL-19, BL-20, BL-21, BL-22, BL-23, BL-24, BL-25, BL-Remanente; y por el OESTE, con la Parcela Tres (3) formada por la agrupación de las parcelas FS-1, FS-2, FS-3, FS-4, FS-5, FS-6, FS-7, FS-8, FS-9 y FS-Remanente." -----

-----E. Parcel 5. -----

"RÚSTICA: Barrio Jobos del Municipio de Guayama, Puerto Rico. Solar: Cinco (5). Cabida: setecientos noventa y siete mil cuatrocientos veintisiete punto tres mil quinientos veintiséis (797,427.3526) metros cuadrados. En lindes por el NORTE, con la Parcela Seis (6) formada por la agrupación de las parcelas BL-10, BL-11, BL-12, BL-13 y BL-14 y con la Comunidad Villa Las Parcelas Nuevas; por el SUR, con Carretera Estatal PR-3 y con estación de gasolina; por el ESTE, con la Carretera Estatal PR-713 y con la Comunidad Villa Las Parcelas Nuevas; y por el OESTE, con la Parcela Cuatro (4) formada por la agrupación de las parcelas BL-8, BL-9, BL-15,

BL-16, BL-17 y BL-18, con terrenos de Nereida Benito Minondo y con estación de gasolina. Esta finca tiene una cabida de doscientos dos punto ocho ocho siete tres (202.8873) cuerdas." -----

-----The above property (the "Parcel 5") is

-----I. Parcel Florida. -----

"RÚSTICA: Finca denominada "Florida" ubicada en el barrio Jobos del término municipal de Guayama, Puerto Rico con un área de ochenta y cuatro punto siete cuatro siete ocho (84.7478) cuerdas, equivalentes a treinta y tres (33) Hectáreas, treinta (30) áreas, noventa y dos (92) centiáreas y treinta y siete (37) miliáreas; en lindes por el NORTE, con terrenos de Jorge González Rodríguez; por el SUR, con la carretera estatal PR-3; por el ESTE, con terrenos de Barilac Products Inc y terrenos de la Sucesión Benito; y por el OESTE, con terrenos de la finca Amoros." -----

-----J. Parcel Benito A. -----

"RÚSTICA: Finca ubicada en el Barrio Jobos del Municipio de Guayama, Puerto Rico, con un área de CUARENTA Y TRES CUERDAS CON QUINIENTAS SETENTA Y NUEVE DIEZMILÉSIMAS (43.0579 cdas.), equivalentes a ciento sesenta y nueve mil doscientos treinta y cuatro metros cuadrados con cuatro mil

cuatrocientos setenta y seis diezmilímetros (169,234.4476 m.c.), en lindes: por el Norte, en doscientos treinta y un metros ochocientos milímetros (231.800 m.), con finca propiedad de Don Cándido Alonso; por el Sur, en doscientos treinta y seis metros sesenta y ocho milímetros (236.068 m.) con la Carretera Estatal Número Tres (3); por el Este, en setecientos cincuenta y un metros cuatrocientos cincuenta milímetros (751.450 m.) con el lote C-2 a adjudicarse a Doña Alma Belén Benito Minondo; y por el Oeste, en setecientos ocho metros setecientos cincuenta y cuatro milímetros (708.754 m.) con la finca propiedad de Hacienda Florida Incorporada." -----

-----K. Parcel Benito B. -----

"RÚSTICA: Finca ubicada en el Barrio Jobos del municipio de Guayama, Puerto Rico, con un área de cuarenta y tres cuerdas con quinientas ochenta y nueve diezmilésimas de cuerda (43.0589 cdas.), equivalentes a CIENTO SESENTA Y NUEVE MIL DOSCIENTOS TREINTA Y OCHO METROS CUADRADOS CON DOS MIL CINCO DIEZMILÉSIMAS DE METRO CUADRADO (169,238.2005 m.c.), y en lindes: por el NORTE, en doscientos diecinueve punto tres tres cero metros (219.330 m.), con finca propiedad de don Cándido Alonso; por el SUR, en doscientos veintitrés punto tres cinco ocho metros (223.358 m.) con la carretera Estatal Número Tres (3); por el ESTE, en setecientos noventa y uno punto ocho cuatro seis metros (791.846 m.), con el lote C-3 a adjudicarse a doña Nereida Benito Minondo; y por el OESTE, en setecientos cincuenta y uno punto cuatro cinco cero metros (751.450 m.), con el lote C-1 a adjudicarse a doña Margarita Benito Minondo." -----

-----L. Parcel Benito C. -----

"RÚSTICA: Finca ubicada en el Barrio Jobos del Municipio de Guayama, Puerto Rico, con un área de cuarenta y tres cuerdas con quinientas ochenta y nueve diezmilésimas de cuerda (43.0589 cdas.), equivalentes a CIENTO SESENTA Y NUEVE MIL DOSCIENTOS TREINTA Y OCHO METROS CUADRADOS CON MIL SETECIENTAS OCHENTA Y CINCO DIEZMILÉSIMAS DE METRO CUADRADO (169,238.1785 m.c.), en lindes: por el Norte, en doscientos dieciséis metros con novecientos cincuenta y dos milésimas de metro (216.952 m.), con finca propiedad de Don Cándido Alonso; por el Sur, en dos alineaciones de ciento sesenta y dos metros con quinientas veintiuna milésimas de metro (162.521 m.) y cuarenta y ocho metros con cuatrocientas cuarenta y ocho milésimas de metro (48.448 m.) con la Carretera Estatal Número 3; por el Este, en setecientos ochenta y cinco metros con quinientas ochenta y cinco milésimas de metro (785.585 m.) con finca propiedad de Manuel Cantino Jordán; y por el Oeste, en setecientos noventa y un metros con ochocientas cuarenta y seis milésimas de metro (791.846 m.) con el lote C-2 a adjudicarse a Doña Alma Belén Benito Minondo. -----

3.3 Site and Vicinity General Characteristics

The study area subject to this Phase I ESA (Site B) consists of an area of approximately 533 acres (549 cuerdas) located between highway PR-53 and PR-3 within the South Coastal Plains of Puerto Rico. The site is located within farmland. The area was previously owned by Mycogen Seeds, who developed and operated a Research, Development, and Parent Seed facility within the property area. The Property has been historically used for agricultural purposes. The area is zoned as A-P (Productive Agricultural). Adjoining areas to the Property are mainly classified as A-P (Productive Agricultural), A-D (Developed Areas), DTS (Selective Tourist District), and R-G (General Rural).

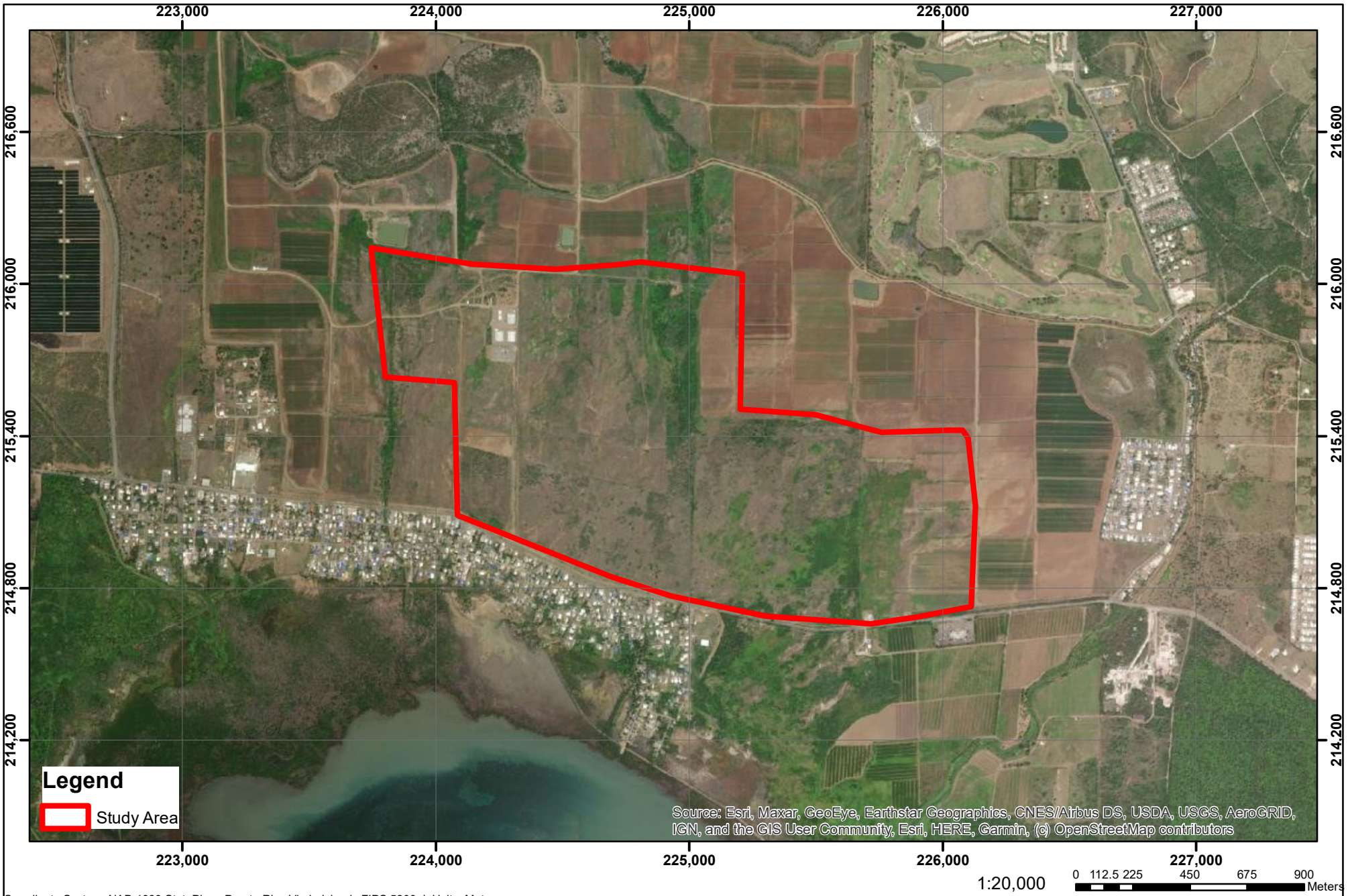
The main Property area is bounded to the north by the Guamaní Irrigation Channel and State Highway PR-53; to the east by El Legado Golf Course and Villodas Community; to the south by State Road PR-3 and the San Felipe and Chún Chin Communities; to the west by State Road PR-706, idle agricultural fields, a state penitentiary, and residential and commercial areas.

Based on the FEMA Flood Insurance Rate Map for the area (Map Number 72000C2105J/May 25, 2018), most of the Property area is located outside flood areas (Zone X).

The geology of the site mostly consists of alluvial fans (Qf) of Quaternary Age. Rocks of the Formation C (Kcf) and Diorite outcrop in the small hills located in the northern section of the Property (USGS Central Aguirre Quadrangle, 1960³). According to the Soil Conservation Service, the soil composition in the general area is described as follows:

- Soil Component Name: JACANA
- Soil Surface Texture: Clay
- Hydrologic Group: Class D – Very slow infiltration rates. Soils are clayey, have a high-water table, or are shallow to an impervious layer.
- Soil Drainage Class: Well drained. Soils have intermediate water holding capacity. Depth to water table is more than 6 feet.
- Hydric Status: Soil does not meet the requirements for a hydric soil.

³ Berryhill, H. L. 1960. Geology of the Central Aguirre quadrangle, Puerto Rico. U.S. Geol. Surv. Misc. Inv. Map I-318, U.S. Geological Survey.



Coordinate System: NAD 1983 StatePlane Puerto Rico Virgin Islands FIPS 5200 | Units: Meter

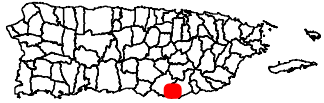


Figure 2. Aerial Photo
Salinas PV Site B



Date: 4/6/2021



3.4 Current Use of the Property

Most of the study area (Site B) is currently vacant. Some portions of the study area and adjoining areas are currently leased for agricultural purposes (about 600 cuerdas of alfalfa and soya seeds production). The previous owner, Mycogen operated a Research & Development and Parent Seed Facility at the Property until 2019-2020.

3.5 Description of Structures, Roads, other Improvements on the Site

State road PR-706 provides direct access to the site. The main access routes connecting to PR-706 are State Road PR-3 to the south and Highway PR-53 to the north. The general property area is occupied by the former Mycogen Research and Development and Parental Seeds Facility. The former Mycogen facilities are located into two distinct areas within the property, one to the north-west property quadrant (outside of Site B) and the second one near the center of the property (within Site B). The facilities located at the northern side includes a security gate with guardhouse, parking areas, offices, warehouses, and seeds processing facilities. The facilities located at the central property area includes warehouses facilities and machine shop areas. Near this area there are four historic silos. Two irrigation channels (Guamaní and Patillas) traverse the property. The site is subject to PREPA right of way along both sides of the channels. Multiple water wells were observed throughout the property area. There are four water storage tanks at the top of one of the hills located in the north side of the property area. Other improvements in the area include storm water management systems and electrical utilities. The property area is fenced.

3.6 Current Uses of the Adjoining Properties

Adjoining properties uses to the north include public uses associated with the highway and the Guamani Channel as well as idle agricultural fields. A golf course and residential areas are located at the east property boundary. Land uses to the south include public (PR-3) and residential uses, while uses of adjoining properties toward the west property boundary include public uses (PR-706), commercial, institutional, agricultural, and residential areas.

4 User Provided information

Appendix B includes the Phase I ESA User Questionnaire completed by a representative of the user, Jose De Sousa (Business Development Manager).

4.1 Land Title Record

Land title records for the Property were provided by the current owner (Agriart, LLC.). Legal descriptions of the parcels where the study area is located are included in Section 3.2.

4.2 Owner, Property Manager, and Occupant Information

The Property is owned by Agriart, LLC, a Commonwealth of Puerto Rico limited liability company. The User, Clean Flexible Energy, LLC, is in the process of formalizing a lease contract of the property.

4.3 Information Reported by the User Concerning Environmental Liens or Activity and Use Limitations

The User did not provide PMG evidence of any currently recorded environmental liens or activity and use limitations against the Property.

4.4 Specialized Knowledge or Experience of the User

The User did not provide PMG with any other information concerning any specialized knowledge or experience that is material to recognized environmental conditions in connection with the Property.

4.5 Reason for Significantly Lower Purchase Price

The User considers that the lease value reasonably reflects the fair market value if the property was not contaminated.

4.6 Reason for Performing Phase I ESA

The purpose of this Phase I ESA is to meet the “all appropriate inquiry” requirement of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (42 U.S.C. §9601) and petroleum products. As such, this practice is intended to permit a user to satisfy one of the requirements to qualify for the *innocent landowner*, *contiguous property owner*, or *bona fide prospective purchaser* limitations on CERCLA liability, also known as, the “landowner liability protections or LLPs”: that is, the practice that constitutes “all appropriate inquiry into the previous

ownership and uses of the property consistent with good commercial or customary practice” as defined at 42 U.S.C. §9601(35) (B).

The subject Site is being proposed for the development of a photovoltaic energy project. The Phase I ESA is being conducted as part of the pre-development investigation and planning studies prior to construction.

5 Records Review

5.1 Standard Environmental Record Sources

As part of this Phase I ESA, the services of Environmental Data Resources (EDR) were contracted to review the required federal and state databases for records regarding possible hazardous material handling, spills, storage, production, or remediation at the Property or in the vicinity areas of the Property that could constitute a recognized environmental condition. Records from EDR are organized by zip code or by a Radius Map Analysis. Some of the site locations provided by EDR were field verified and adjusted. For the Phase I ESA, a Radius Map Analysis was developed, and the results are presented in the subsequent sections.

The subject Property (also target property) was not listed in any of the databases searched. No mapped sites were found within the radius search from the Property. Nevertheless, two (2) unmapped sites (listed in the “orphan sites” list) are presumed to be located within the radius search from the Property and are included in the discussion below. Results of the environmental database searches are included in **Appendix C** and are summarized in the following sections.

Table 1. Summary of Environmental Database Search

Database	Description	Search Distance (miles)	Target Property (TP)	Other Facilities Listed ¹
FEDERAL				
NPL	The federal National Priority List (NPL), or Superfund sites list, is the U.S. EPA’s database of uncontrolled or abandoned hazardous waste sites identified for priority investigations, and as appropriate, remedial actions under the Superfund Program.	1.0	0	0
Delisted NPL	Deletion of sites from the NPL may occur once all response actions are complete and all cleanup goals have been achieved	1.0	0	0
CERCLIS (SEMS)	The Comprehensive Environmental Response, Compensation and Liability Information System (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 CERCLA. <i>(The list was renamed to SEMS by the EPA in 2015).</i> The list contains sites	0.5	0	0

Database	Description	Search Distance (miles)	Target Property (TP)	Other Facilities Listed ¹
	which are either proposed to or on the NPL and sites which are in the screening and assessment phase for possible inclusion on the NPL.			
CERCLIS NFRAP (SEMS-Archived)	An archived site is one at which EPA has determined that assessment has been completed and no further remedial action is planned under the Superfund program.	0.5	0	0
RCRA CORRACTS	CORRACTS Facilities List identified facilities with RCRA Corrective Action Activity. A corrective action is issued pursuant to RCRA Section 3008(h) when there has been a release of hazardous waste or constituents into the environment from an RCRA-regulated facility.	1.0	0	0
RCRA NON-CORRACTS TSD	This 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).	0.5	0	0
RCRA generators list	The RCRA information database lists facilities that have notified the U.S. EPA of hazardous waste activity. The notifiers may engage in the generation, transportation, treatment, storage and/or disposal of hazardous wastes.	0.25	0	0
Institutional controls/engineering controls registries	Register of institutional controls (ICs) and engineering controls (ECs) in the management of RCRA hazardous waste facilities.	0.5	0	0
ENRS List	The ERNS database records all the phone calls made to the National Response Center (NRC). The NRC is notified when any one of a number of different types of accidental spills or releases of toxic substances happens.	TP	0	NA
STATE				
State Equivalent NPL or CERCLIS Site Lists	Not available (Puerto Rico has no State-equivalent Superfund program)	NA	NA	NA
UST List	State Registered Underground Storage Tank (UST) List	0.25	0	0

Database	Description	Search Distance (miles)	Target Property (TP)	Other Facilities Listed ¹
LUST List	State Leaking Underground Storage Tank (LUST) List	0.50	0	1
VCP	Voluntary Clean-up Sites	0.5	0	0
ADDITIONAL ENVIRONMENTAL RECORD				
RCRA 2020 COR Action	RCRA 2020 Correction Action Universe	0.25	0	0
Brownfield sites	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.	0.5	0	0
Local Landfill/Solid Waste Disposal Sites	List of landfill and solid waste disposal facilities	0.5	0	0
Local Lists of Hazardous Waste / contaminated sites	Local lists of hazardous waste and contaminated sites	TP	0	0
RCRA – Non Generators / No Longer Regulated	Facilities that are no longer regulated under RCRA	0.25	0	0

¹ Sites may be listed in more than one database.

5.1.1 Other Ascertainable Records

No records of the subject Site (target property or TP) or properties within the specified search distance were found for the following federal databases:

- Formerly Used Defense Sites (FUDS) (1.0 miles)
- Department of Defense Sites (DOD) (1.0 miles)
- State Coalition for Remediation of Dry Cleaners Listing (0.50 miles)
- Financial Assurance Information (TP)
- EPA Watch List (TP)
- Federal Toxic Chemical Release Inventory System (TRIS)
- Aerometric Information Retrieval System Facility Subsystem (US AIRS (AFS)) (0.5 miles)
- FIFRA/TSCA Tracking System (FTTS) Inspection and Enforcements (TP)
- Toxic Substance Control Act (TP)
- Risk Management Plans (TP)
- RCRA Administrative Action Tracking System (TP)
- PCB Activity Database System (PADS) (TP)

- Steam-Electric Plant Operation Data (COAL ASH DOE) (TP)
- Coal Combustion Residues Surface Impoundments List (COAL ASH EPA) (0.50 miles)
- PCB Transformer Registration Database (TP)
- Radiation Information Database (RADINFO) (TP)
- Incident and Accident Data (DOT OPS) (TP)
- Superfund (CERCLA) Consent Decrees (CONSENT) (1.0 miles)
- Indian Reservations (1.0 miles)
- Uranium Mill Tailings Sites (UMTRA) (0.50 miles)
- Lead Smelter Sites (TP)
- Mines Master Index File (US Mines) (0.25 miles)
- Unexploded Ordnance Sites (UXO) (0.50 miles)

5.1.2 Orphan Sites

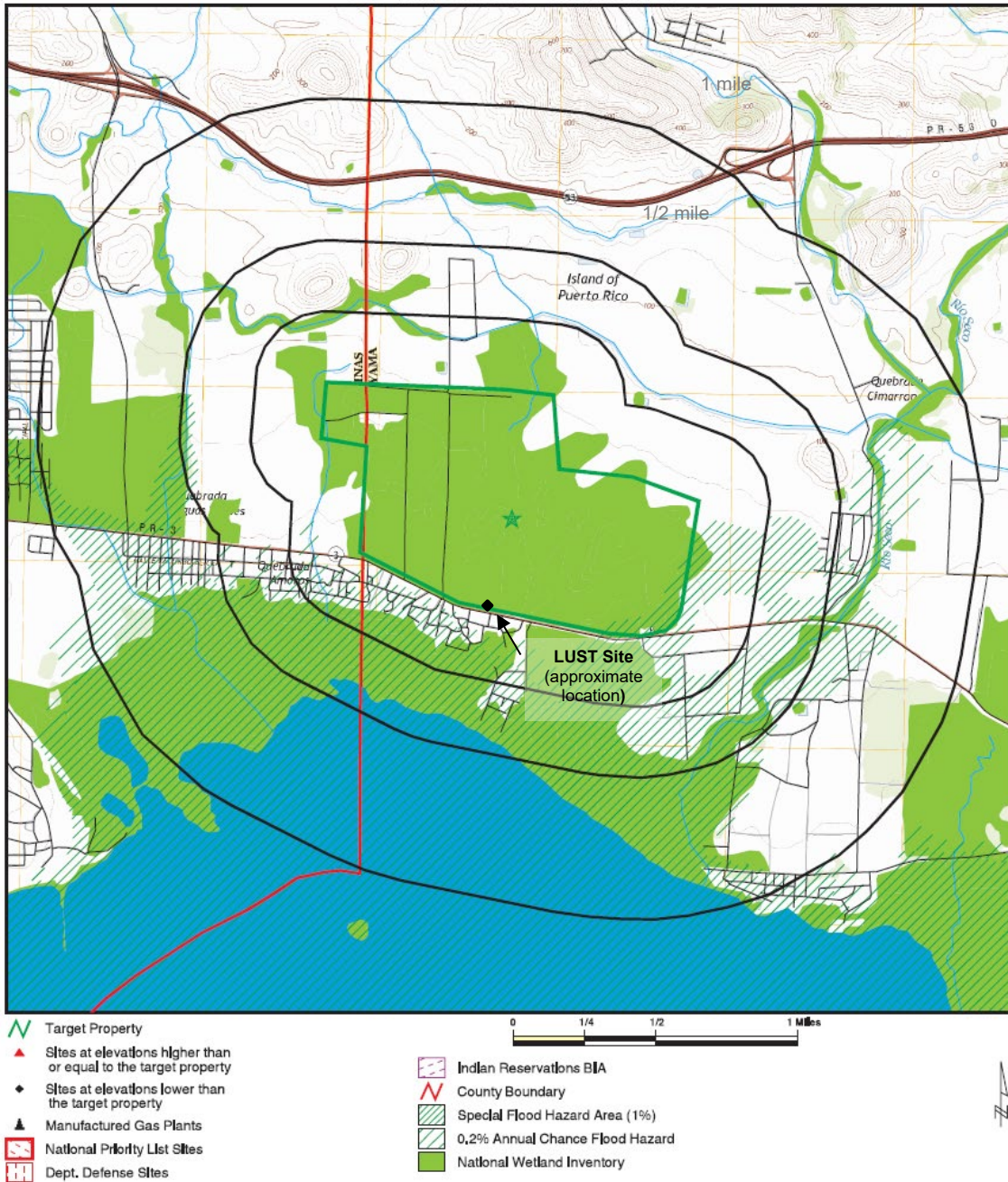
“Orphan” means a site not precisely locatable by EDR from the information in the databases. A total of 8 records were identified by EDR as orphan. Most of the records correspond to facilities on the Puerto Rico Environmental Quality Board (EQB)’s LUST list. The locations of the listed orphan sites were reviewed based on available information on facility names and addresses. Only one (1) of the sites were found within the minimum search distance from the subject Property (GPR # 1301).

5.1.3 Summary of Listed Records of Concern to the Project

The subject Site (“target property”) was not listed in any of the databases searched. No mapped sites were found within the radius search from the Property. Nevertheless, one (1) unmapped site (listed in the “orphan sites” list) are presumed to be located within the radius search from the Property. **Table 2** provides a summary of database results relevant to the subject Property area.

Table 2. Summary of Site Area Listings

Listed Facility	Database	Remarks
GPR # 1301 Carr. # 3 KM 149.9 Bo. Jobos Guayama, PR	LUST (Leaking Underground Storage Tank)	Facility ID: 91-0102 Facility (gas service station) located at PR-3 near the southern property boundary. The site is listed as an Inactive site of the LUST list. Product in soil was found on March 7, 2005. Owner name: Gasolinas de Puerto Rico.



	<p>Figure 3. Radius Map Findings</p> <p><i>Salinas Site B Phase I ESA</i></p>		
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5.2 Physical Setting Source(s)

5.2.1 Topographic Maps

The Property sits between Barrio Aguirre in the Municipality of Salinas and Barrio Jobos of the Municipality of Guayama in the south coast of Puerto Rico. As part of this Phase I ESA, PMG reviewed the current 7.5-Minute United States Geological Survey (USGS) Topographic Map for Central Aguirre (5964446 CENTRAL AGUIRRE, PR. USGS, 2013). According to this source, the Property area elevation is approximately 33 feet above mean sea level. The general topographic gradient is towards the south-southwest.

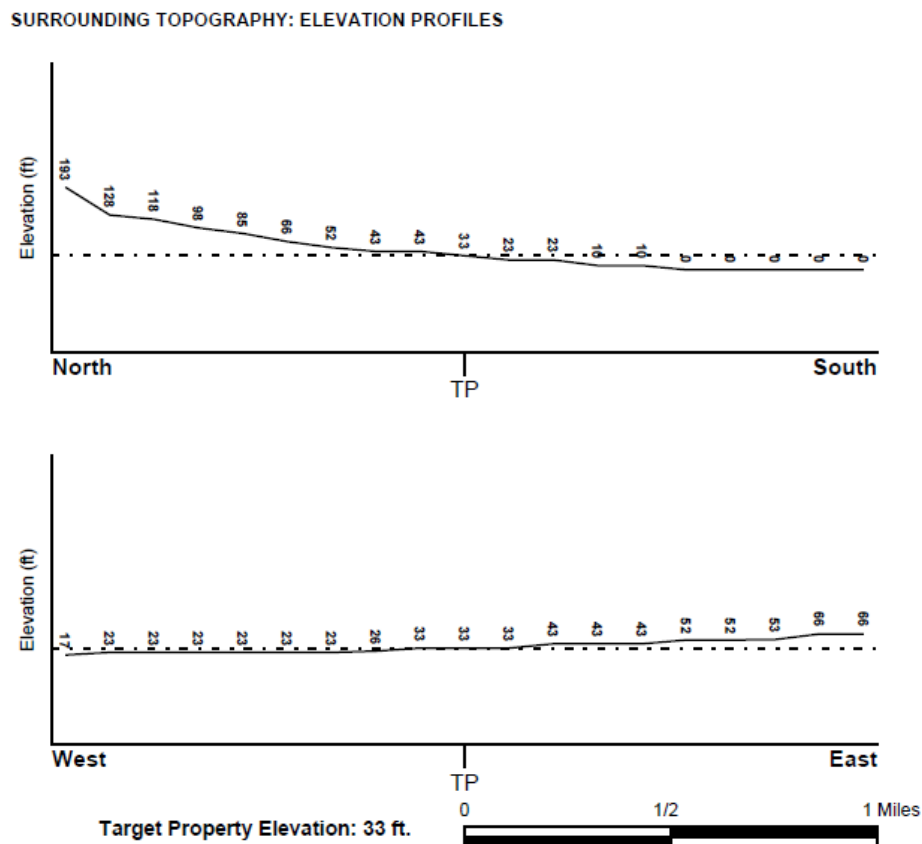
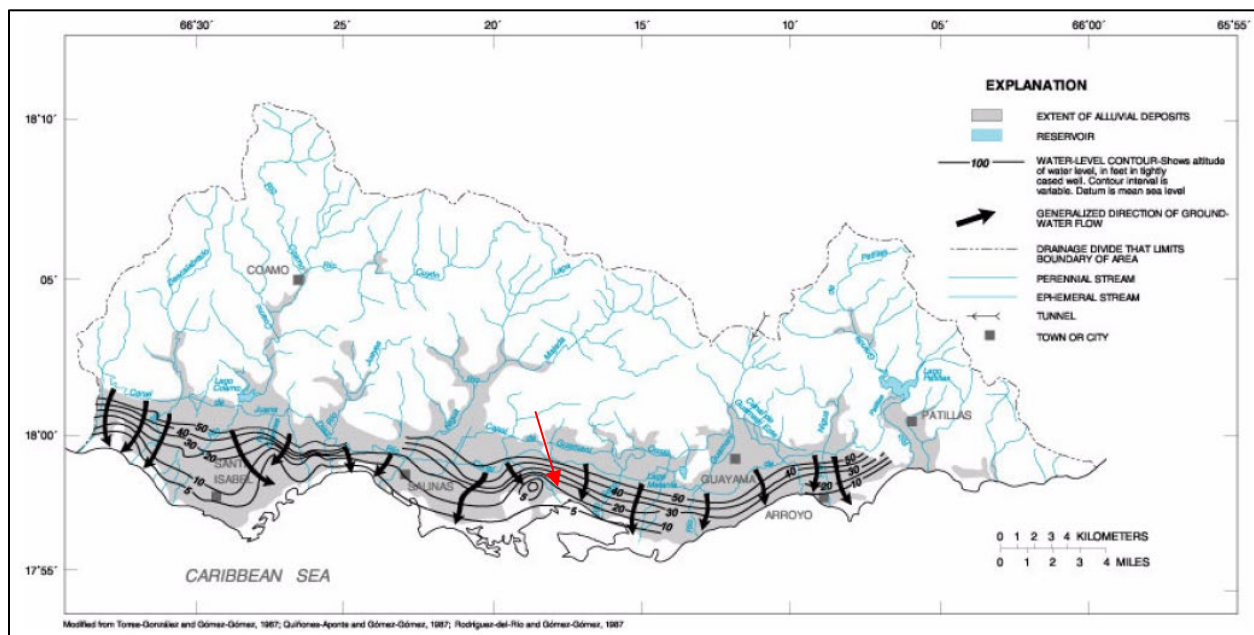


Figure 4. Elevation Profiles

5.2.2 Hydrogeological Information

The Atlas of Ground-Water Resources in Puerto Rico and the U.S. Virgin Islands (USGS, 1996) was reviewed to obtain a general description of the hydrogeological conditions of the Santa Isabel-Patillas Region in the South Coast area of Puerto Rico, where the subject Property sits. The alluvial deposits of Quaternary age are the most important lithologic unit in the Santa Isabel-Patillas region, containing its only sizeable aquifer (USGS, 1996). Ground-water levels in the Santa Isabel-Patillas region range from 150 to 200 feet above mean sea level near the bedrock-alluvial contact to a few feet above mean sea level near the coast. The generalized groundwater flow direction in towards the coast (**Figure 5**).



Source: Atlas of Ground-Water Resources in Puerto Rico and the U.S. Virgin Islands (USGS, 1996)

Figure 5. Generalized Direction of Groundwater Flow in the Santa Isabel-Patillas Region.

5.3 Historical Use Information Sources

5.3.1 Historical Use Information of the Property

According to historical use information reviewed, the subject property has been historically used for agricultural purposes (crops, cattle grazing, and dairy production). According to an archaeological investigation (Melendez-Ortiz, 2012⁴) conducted at the subject Property area, during the 19th century and most of the 20th century, the area under study was dedicated to the planting of sugar cane. In the first half of the 20th century there were two areas where the cane harvested on the farm was collected. One of these was the extinct Besosa colony, located southwest of the farm, within the municipal limits of Guayama; and the other - without a name - was located to the west, within the municipality of Salinas. From these two areas there were branches of the train that connected with the Ponce-Guayama Railroad line between Puerto de Jobos and Aguirre, south of the San Felipe and Chún Chín communities. It is possible that sectors of the farm have been used for cattle grazing since the 19th century. It is reported that during the second half of the 20th century, the vast majority of the parcels that make up the farm were owned by La Julia (north), possibly related to the Hacienda Julia dairy farm, located in the Cimarrona neighborhood and in existence between ca. 1910 to 1960. La Julia and Hacienda Santa Elena merged in 1995. Hacienda Santa Elena Inc. and Ganadería del Sur, S.E. owned the lands until it was acquired by Mycogen seeds in 2012.

5.3.2 Historical USGS Topographic Maps

Historical USGS topographic maps of the subject site and vicinity dated 1945, 1952, 1960, 1970, and 1982 were reviewed (see **Appendix D**).

Topographic Map	Observations
Central Aguirre, PR 1945 (HTMC, 1945 ed.)	The 1945 map shows the irrigation channels (Guamaní and Patillas), several structures are observed close to one of the hills in the northern property section and in the southern sector (Colonia Besosa). PR-3 and the San Felipe residential development are shown to the south.
Central Aguirre, PR 1952 (HTMC, 1953 ed.)	The 1952 map shows five rectangular features, corresponding to the location of the Dairy Farm operation (Vaquería) in the center of the property. Also, an additional water pond is observed in the northwestern quadrant of the

⁴ Melendez-Ortiz (2012). Phase IA Archaeological Investigation Report. Prepared for Dow AgroSciences/Mycogen Seed Project. Guayama-Salinas, Puerto Rico. CSA Group.

Table 3. Topographic Map Review	
Topographic Map	Observations
	property. Beside this, the property conditions appear similar to the conditions shown in the 1945 map. Expansion of the residential areas south of PR-3 is shown.
Central Aguirre, PR 1960 (HTMC, 1962 ed.)	The 1960 map show less structures within the property area in comparison with the ones shown in the previous maps. No major changes to the subject property topographic features are observed. Dense urban developments are shown south of PR-3. PR-706 (west of the property area) has been developed. The PR-53 is yet to be developed.
Central Aguirre, PR 1970 (HTMC, 1972 ed.)	Additional (and permanent) structures are shown in the dairy farm area. Four additional water ponds are now observed within the property area.
Central Aguirre, PR 1970 (HTMC, 1982 ed.)	Additional structures are observed near the dairy farm site. Site topographical features remains similar to previous maps. The PR-53 is yet to be developed.

5.3.3 Aerial Photographs

Aerial photographs for the years 1950, 1967, 1989, 1993, and 1994 were reviewed to assess the development and activities (past uses) of the subject Property and surrounding areas over time (**Appendix D**). Available satellite images from Google Earth for the period of 2004 to 2019 were also reviewed. Information related to observed features on the subject Property and surrounding areas is presented below.

Table 4. Aerial Photo Review		
Date / Source	Scale	Observations
1950 (costavispr.org)	NA	B/W photo. The irrigations channels (Guamaní and Patillas) are observed. A water pond is observed in the northern property boundary (south of Guamani Channel). Small structures are observed south of Patillas Channel. This area coincides with documented agricultural uses by Hacienda Santa Elena (dairy farm area). The general configuration of the tract of land is suggestive of agricultural uses. Scattered residential structures are observed in the San Felipe and Mosquito area south of PR-3.

Table 4. Aerial Photo Review

Date / Source	Scale	Observations
1967 (November 24, 1967) / USGS	1"=1000'	B/W photo, good resolution. Additional structures are observed in the Dairy Farm Area (vaqueria) and some dispersed structures are now observed south of one of the hills in the northern section of the property. Several (7 in total) water ponds (one in construction) are now observed in the area. Property condition suggestive of agricultural uses, particularly cattle grazing. More dense residential developments are observed south of PR-3 (San Felipe residential area)
1989 (March 31, 1989) / USGS	1"=1000'	Infrared photo. Poor resolution photo. Site conditions remain similar to conditions described in the 1967 photo. No additional developments are observed within the property area. Surrounding areas to the south are now densely developed. Highway PR-53 is yet to be developed.
1993 (December, 17 1993) / USGS	1"=1000'	Color photo, medium resolution. Changes in the structures associated to the dairy farm are observed. Earth movement (bare soils) is observed east of this area. A dirt road is now observed up to the top of hill in the northern section of the property, where the existing property water tanks are located (the water tanks are not observed in this photo). Highway PR-53 and state road PR-706 are now shown in the photo. A small structure is observed in the southeastern boundary of Site B.
1994 (November 24, 1994) / USGS/DOQQ	1"=1000'	B/W photo, good resolution. Site conditions remain like conditions described in the 1993 photo.
Satellite images from 2004 - 2019	N/A	The 2004 photo shows the water tanks at the top of the hill in the northern section of the property area, construction of the golf course located east of the property, and new developments in surrounding properties to the southwest. Whereas the 2014 photo shows the new Mycogen structures within the property area. The old dairy farm structures have been demolished. The photo also shows a solar farm developed in a tract of land west of PR-706.

5.3.4 Historical Use Information on Adjoining Properties

Although specific sources of historical use on adjoining properties were not reasonable ascertainable, historical topographic maps and aerial photographs from 1950 to 1994 were reviewed in order to assess the uses and development of the area surrounding the Property.

5.3.5 Fire Insurance Maps

No fire insurance maps covering the area where the Property is located were found.

5.3.6 Property Tax Files

Due to time and cost constraints, property tax files were not reasonably ascertainable for this Phase I ESA.

5.3.7 Local Street Directories

Local street directories are directories published by private (or sometimes government) sources that show ownership, occupancy, and/or use of sites by reference to street addresses; most common of these are the “reverse telephone directories” that are organized by a street address followed by the occupant or business name, and then the phone number. Street directories are not available for Puerto Rico.

5.3.8 Building Department Records

Building department records means those records indicating permission of the local government to construct, alter, or demolish improvements on the Property. Given that building department records from Puerto Rico permitting agencies are not readily available, and that the Property has not been developed yet, these records were excluded from this assessment.

5.3.9 Prior Environmental Studies

A Phase I ESA of the 1,940 acres Property area conducted by RMA Environmental Inc. on January 15, 2021, was available for review. The assessment was undertaken as part of AGRIART LLC due diligence process, as required by financing institutions, in connection with purchasing the property. According to the information provided, the Phase I ESA was performed in accordance with ASTM Phase I Environmental Site Assessment E1527 – 05. The assessment revealed no evidence of environmental conditions within the site.

6 Site Reconnaissance

6.1 Methodology and Limiting Conditions

As part of this Phase I ESA, the environmental professional conducted site reconnaissance of the Property and general vicinity on April 22, 2021, and June 2, 2021. The objective of the site reconnaissance was to obtain information indicating the likelihood of identifying recognized environmental conditions in connection with the Property, such as the present or past use, storage, treatment, handling or disposal of hazardous substances or petroleum products on or immediately adjoining the site. The site reconnaissance was conducted walking through the Property and driving around to identify and observe surrounding properties. The Property areas were easily accessed. The site reconnaissance included the areas where the PV project is proposed (Site B). The site reconnaissance did not include the inspection of the interior of any of the buildings. Photographs taken during the site reconnaissance visits are included in **Appendix E**.

6.2 General Site Setting

The study area subject to this Phase I ESA (Site B) consists of an area of approximately 533 acres (549 cuerdas) located within eight contiguous land parcels owned by Agriart, LLC. The subject site consists of relatively flat farmland. The property area has been developed and improved with agro-industrial facilities (Mycogen Seed facilities). The former Mycogen Seed facilities are currently vacant. Agricultural activities were observed within subject site. Most of the cultivated lands were observed north of the subject site. Portions of the main property are currently used for soya and alfalfa seeds production by Corteva (approximately 600 cuerdas).

The Property is located in a mixed used area, bordered by residential, touristic, institutional and commercial areas. The site is mostly covered by dry pastures except for the active agricultural production areas. The area is bounded to the north by PR-53 and to the south by PR-3 and high-density residential areas. A low density mixed used area (residential, institutional, and commercial) is located in the southwest boundary. The property has been historical used for agricultural purposes. Several water ponds (reservoirs for irrigation purposes) are present within the Property area. There are several water extraction wells with filtration equipment within the general property area (some of the wells are registered with Department of Health as public water systems for potable use). Also, there are several groundwater monitoring wells throughout the general property area.

The following table summarizes the general site observations.

Table 5. General Site Observations	
General Site Setting	Observation
Current Use(s) of the Property	Agricultural (although most of the property area is currently vacant)
Past Use(s) of the Property	Agricultural (crops, dairy farm, and livestock grazing)
Current Uses of Adjoining Properties	North – Guamaní Irrigation Channel and Highway PR-53 East – farmlands, golf course and residential areas South – PR-3 and residential areas West – PR-706, idle agricultural fields, institutional uses (penitentiary and police station), residential and commercial areas.
Past Uses of Adjoining Properties	Agricultural and residential uses
Current and Past Uses in the Surrounding Areas	Residential, public uses (roads), and agricultural uses have been the main dominant uses in the surrounding areas.
Topographic Conditions	The Property is relatively flat with two distinct hills areas in the northern portion. The general topographic gradient is towards the south.
General Description of Structures	Former Mycogen facilities, including security gate, parking, office areas, warehouses and seeds processing areas are located north of the subject site. Additional facilities (machine shops, warehouses, chemical storage rooms) are located in the west portion of subject Site B. Two irrigation channels run through the property area.
Roads	The Site is bordered by state roads PR-3, PR-706, and PR-53.
Potable Water Supply	Puerto Rico Aqueduct and Sewer Authority (PRASA) potable water mains service the area.

Sewage Disposal System	The property area is not served by PRASA sewer mains. Wastewater at the former Mycogen facilities was managed through septic systems (underground injection) (one at each developed area).
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6.3 Site Conditions (Exterior Observations)

The following table summarizes the site conditions to the extent visually and/or physically observed during the site reconnaissance or identified from the interviews or records review.

Table 6. Site Conditions Observations	
Site Conditions	Observations
Hazardous Substances and Petroleum Product in Connection with Identified Uses	None observed within Site B limits. There are two above ground storage tanks (reported empty) located in the former Mycogen facilities (15,000 and 20,000 gal diesel). No stained soils or concrete were observed in the areas surrounding the ASTs.
Storage Tanks	Four water storage tanks (reported inactive) are located on the top of one of the hills located north of the subject Site.
Odors	No pungent, strong or noxious odors were detected during the reconnaissance.
Pools of liquid	Rainwater puddles were not observed along the interior access roads.
Drums	None observed.
Hazardous Substances and Petroleum Products Containers (Not necessarily in connection with identified uses)	None observed.
Unidentified Substance Containers	None observed.
PCBs	None observed.
Pits, Ponds or Lagoons	Several water ponds (water reservoir and irrigation purposes) are located within the property area.

Stained Soil or Pavement	Areas of stained soil or pavement were not observed.
Solid Waste	No mounds or depression with apparent fill that suggest solid waste disposal at the site were observed.
Wastewater	Wastewater were not observed or perceived (by sense of odor) during the reconnaissance.
Wells	Several water extraction and groundwater monitoring wells are located within the property area.
Septic Systems	According to information sources reviewed, there are two underground injection systems or septic tanks at the two former Mycogen facility areas. One of the systems is located within Site B limits.

7 Interviews

7.1 Interview with Owner

The environmental professional interviewed Mr. Ángel Román-Más, environmental consultant and representative of the owner (Agriart, LLC), during a site visit conducted on April 22, 2021. Mr. Román is an expert in water resources and has studied the site area and its general surroundings for many years thus he is knowledgeable of the uses and physical characteristics of the Property. Mr. Román provided the following information:

- The property area has been historically used for agricultural purposes, including sugar cane fields, pastures for cattle grazing, and dairy farm operations. Hacienda Santa Elena and Ganaderia del Sur occupied the property up to 2012 when it was sold to Mycogen Seeds, a subsidiary of Dow Agrosiences (now owned by Corteva). Around 2014 Mycogen developed a Research and Development and Parental Seed facility in the property, which operated at the site until its closure between 2019-2020. It was later acquired by Agriart, LLC. Presently, most of the property area is vacant and about 600 cuerdas (east-southeast of the property) are being leased to Corteva to produce alfalfa seeds.

- A conservation easement in the northern section of the property where the small hills are located is in process of being established with the Department of Environmental and Natural Resources (DNER) as part of a previous mitigation agreement reached with the agency when the Mycogen project was developed. A jurisdictional wetland determination is being conducted at the property to delimit wetlands area.
- Mr. Román indicated that groundwater sampling within the property area and its surroundings have been conducted and there are no indications of chemical contaminants in the groundwater of the area.
- He did not know of any spills or other chemical releases that have taken place at the Property.
- Based on his experience related to the Property, there are no obvious indicators that point to the presence or likely presence of releases at the subject Property.
- He did not know of any environmental lien filed or recorded against the Property, or of any activity or use limitations that are in place on the Property except for the existing utilities easements or right of ways (utilities and irrigation channels easements) and the pending DNER conservation easement.

8 Data Gap Analysis

The ASTM Practice E 1527-13 defines a data gap as a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may also result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance and interviews. A data gap is significant if other information and/or professional experience raises reasonable concerns involving the data gap. Data gaps and its relative importance in relation to the ability of the environmental professional to identify recognized environmental conditions as part of this assessment are discussed below.

- Non-availability of certain historical data sources records (Sanborn Fire Insurance Maps, Local Street Directories, and Property Tax Files). Lack of these records does not constitute a significant data gap since other historical data sources, such as historical topographic maps, aerial maps, and site-specific historical investigations, were obtained.

No significant data gaps were identified as part of this assessment.

9 Findings and Opinion

PMG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E-1527-13 of a tract of land (Site B) of approximately 533 acres located in a Property at state road PR-706 KM 2.3 in Barrio Aguirre of the Municipality of Salinas and Barrio Jobos of the Municipality of Guayama in the South Region of Puerto Rico.

The following sections summarize the findings of this assessment and professional opinion of its impact on the Property.

9.1 Environmental Database Records Review

The environmental records review identified the following records in relation to the Property and/or its vicinity:

9.1.1 Site-Specifics Listings

The Property was not listed in any of the databases searched.

9.1.2 ASTM Search Distances Listings Surrounding the Property

- 1) GPR # 1301 (UST Facility ID: 91-0102) (Carr. 3 KM 149.9) – Gas service station located at PR-3 south from the Property (at relatively lower elevation). The facility is listed in the PREQB Inactive Leaking Underground Storage Tanks List (LUST list).

Opinion: Downgradient facility with reported leaking from an underground storage tank (UST) in 2005. The facility is listed in the inactive LUST list indicative that closure activities at the site has been completed in conformance with state regulation. The facility has not been listed in any other environmental record or subject to corrective action. Given the nature of this finding and its location with respect the subject Property, it is unlikely that this finding has affected, or it is likely to affect the subject Property or Site. As such, this instance has been dismissed as a REC in connection with the Property.

9.2 Historical Use Information Sources

According to historical use information reviewed, the subject property has been historically used for agricultural purposes (crops, cattle grazing, and dairy production). During the 19th century and most of the 20th century, the area under study was dedicated to sugar cane plantation. The subject Property has been used for cattle grazing and dairy production. In 2014, a Research and Development and Parental Seed facility (agro-industrial) was developed on the property.

Opinion: The subject Property has been historically used for agricultural purposes. There is a potential that agricultural chemicals, such as pesticides, herbicides, fungicides, and fertilizers, used onsite have impacted the subject Property. There is no evidence of pesticides discharge, dumping or spill have occurred. The use of farm-related vehicles, heavy equipment or machinery may have resulted in minor leaks of oils and other petroleum products. These instances are considered a *de minimis* condition not a REC. Historical use information sources reviewed have not revealed any suspect recognized environmental conditions in connection with the Property.

9.3 Site Reconnaissance

No conditions indicative of recognized environmental conditions in connection with the Site were identified during the site reconnaissance.

9.4 Interviews

Based on the information obtained during the interview component of this assessment, no known or suspect recognized environmental conditions were identified in connection with the Property.

10 Conclusions

PMG has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E-1527-13 of tract of land (Site B) of approximately 533 acres located in a Property at state road PR-706 KM 2.3 in Barrio Aguirre of the Municipality of Salinas and Barrio Jobos of the Municipality of Guayama in the South Region of Puerto Rico. Any exceptions to, or deletions from, this practice are described in Section 2.4 of this report. **This assessment has revealed no evidence of recognized environmental conditions (REC) in connection with the Property.**

11 References

ASTM Standard Practice E 1527-13. 2013. *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*.

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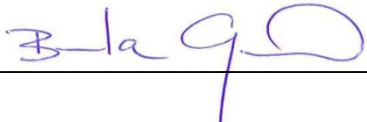
RMA Environmental Inc. 2021. *Phase I Environmental Site Assessment for a 1,940 acres property located between highways PR-53 and PR-3 in the Aguirre Ward of the Municipality of Salinas and Jobos Ward of the Municipality of Guayama*. Prepared for Agriart, LLC. January 15, 2021.

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U.S. Geological Survey (USGS). 1996. *The Atlas of Ground-Water Resources in Puerto Rico and the U.S. Virgin Islands*. Water-Resources Investigations Report 94-4198. Prepared in cooperation with the U.S. Environmental Protection Agency.

12 Environmental Professional Statement

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



06/07/2021

Brenda Guzmán-Colón, DrPH(c), M.S., PMP
Environmental Professional
PMG & Associates, LLC

Date