PA DEP Proposed Statewide Health Standards

2025

Walter H. Hungarter III, P.E.
Vice President
RT Environmental Services, Inc.

April 16, 2025

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- Proposed Statewide Health Standards
  - Changes Currently Proposed
  - Future Changes (Arsenic)
- Lead in Soil
- PFAS
- Impacts to Clean Fill

- Due Diligence Resources

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Proposed Statewide Health Standards

3-Year Review Cycles

July 2, 2024 - Proposed Updates by DEP

Public Comments, Environmental Quality Board Review, Then Implementation

REMEMBER THAT DEP STATEWIDE HEALTH STANDARDS ARE USED AS THE CLEAN FILL STANDARDS

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Proposed Statewide Health Standards

2024 Proposal

Update Lead SHS for Direct Contact

Addition of MORE **PFAS**

Revise PAH Toxicity Values

Update Toxicity Values for 19 Other Compounds to be Consistent with EPA Values

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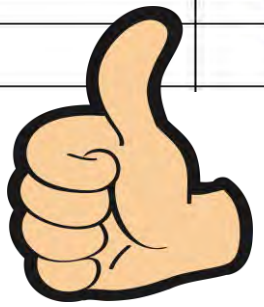
Proposed Statewide Health Standards

Appendix A
Table 3—Medium-Specific Concentrations (MSCs) for Organic Regulated Substances in Soil
A. Direct Contact Numeric Values

REGULATED SUBSTANCE	*CASRN*	*Residential 0—15 feet*		*Nonresidential*		
				Surface Soil 0—2 feet		*Subsurface Soil 2—15 feet*	
BENZO[A]ANTHRACENE	56-55-3	[6.1] 42	G	[130] 910	G	190,000	C
BENZO[A]PYRENE	50-32-8	4.2	G	91	G	190,000	C
BENZO[B]FLUORANTHENE	205-99-2	[3.5] 42	G	[76] 910	G	190,000	C
BENZO[GHI]PERYLENE	191-24-2	13,000	G	190,000	C	190,000	C
BENZO[K]FLUORANTHENE	207-08-9	[3.5] 420	G	[76] 9,100	G	190,000	C
BENZOIC ACID	65-85-0	190,000	C	190,000	C	190,000	C
BENZOTRICHLORIDE	98-07-7	1.4	G	7	G	10,000	C
BENZYL ALCOHOL	100-51-6	10,000	C	10,000	C	10,000	C
BENZYL CHLORIDE	100-44-7	9	N	45	N	52	N
BETA PROPIOLACTONE	57-57-8	0.11	N	0.55	N	0.63	N
BHC, ALPHA	319-84-6	3	G	14	G	190,000	C
BHC, BETA-	319-85-7	10	G	51	G	190,000	C
BHC, GAMMA (LINDANE)	58-89-9	[17] 2.2	G	[83] 32	G	190,000	C
BIPHENYL, 1,1-	92-52-4	8.2	N	34	N	40	N
BIS(2-CHLOROETHOXY)METHANE	111-91-1	660	G	9,600	G	10,000	C
BIS(2-CHLOROETHYL)ETHER	111-44-4	1.3	N	6.7	N	7.6	N
BIS(2-CHLORO-ISOPROPYL)ETHER	108-60-1	[44] 8,800	[N] G	[220] 10,000	[N] C	[250] 10,000	[N] C



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Proposed Statewide Health Standards

Appendix A
Table 3—Medium-Specific Concentrations (MSCs) for Organic Regulated Substances in Soil
B. Soil to Groundwater Numeric Values[1]

REGULATED SUBSTANCE	CASRN	Used Aquifers														Soil Buffer Distance (feet)
		TDS ≤ 2500 mg/L				TDS > 2500 mg/L				Nonuse Aquifers						
		Residential		Nonresidential		Residential		Nonresidential		Residential		Nonresidential				
		100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value			
BENZIDINE	92-87-5	0.000092	0.12 E	0.0012	1.6 E	0.0092	12 E	0.12	160 E	0.092	120 E	1.2	1,600 E			5
BENZO[A]ANTHRACENE	56-55-3	[0.03] 0.21	[26] 180 E	[0.39] 1.1	[340] 960 E	1.1	960 E	1.1	960 E	1.1	960 E	1.1	960 E			5
BENZO[A]PYRENE	50-32-8	0.02	46 E	0.02	46 E	0.38	860 E	0.38	860 E	0.38	860 E	0.38	860 E			5
BENZO[B]FLUORANTHENE	205-99-2	[0.018] 0.12	[25] 170 E	0.12	170 E	0.12	170 E	0.12	170 E	0.12	170 E	0.12	170 E			5
BENZO[GHI]PERYLENE	191-24-2	0.026	180 E	0.026	180 E	0.026	180 E	0.026	180 E	0.026	180 E	0.026	180 E			5
BENZO[K]FLUORANTHENE	207-08-9	[0.018] 0.055	[200] 610 E	0.055	610 E	0.055	610 E	0.055	610 E	0.055	610 E	0.055	610 E			5
BENZOIC ACID	65-85-0	44,000	2,700 E	20,000	7,500 E	400,000	50,000 E	400,000	50,000 E	44,000	2,700 E	20,000	7,500 E			NA

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Proposed Statewide Health Standards

LEAD
Reduced and
Increased

CADMIUM
Reduced

CLEAN FILL?

Appendix A
Table 4—Medium-Specific Concentrations (MSCs) for Inorganic Regulated Substances in Soil
A. Direct Contact Numeric Values

REGULATED SUBSTANCE	*CASRN*	*Residential MSC 0—15 feet*		*Nonresidential MSCs*			
				Surface Soil 0—2 feet		*Subsurface Soil 2—15 feet*	
ALUMINUM	7429-90-5	190,000	C	190,000	C	190,000	C
ANTIMONY	7440-36-0	88	G	1,300	G	190,000	C
ARSENIC	7440-38-2	12	G	61	G	190,000	C
BARIUM AND COMPOUNDS	7440-39-3	44,000	G	190,000	C	190,000	C
BERYLLIUM	7440-41-7	440	G	6,400	G	190,000	C
BORON AND COMPOUNDS	7440-42-8	44,000	G	190,000	C	190,000	C
CADMIUM	7440-43-9	**[110] 22**	G	**[1,600] 320**	G	190,000	C
CHROMIUM III	16065-83-1	190,000	C	190,000	C	190,000	C
CHROMIUM VI	18540-29-9	37	G	180	G	140,000	N
COBALT	7440-48-4	66	G	960	G	190,000	N
COPPER	7440-50-8	7,200	G	100,000	G	190,000	C
CYANIDE, FREE	57-12-5	**[130] 140**	G	**[1,900] 2,000**	G	190,000	C
FLUORIDE	16984-48-8	8,800	G	130,000	G	190,000	C
IRON	7439-89-6	150,000	G	190,000	C	190,000	C
LEAD	7439-92-1	**[500] 200**	**[U] I**	**[1,000] 1,100**	**[S] A**	190,000	C
LITHIUM	7439-93-2	440	G	6,400	G	190,000	C
MANGANESE	7439-96-5	31,000	G	190,000	C	190,000	C

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Proposed Statewide Health Standards

Table 4 - Medium-Specific Concentrations (MSCs) for Inorganic Regulated Substances in Soil

B. Soil to Groundwater Numeric Values[1]

REGULATED SUBSTANCE	CASRN	Used Aquifers								Nonuse Aquifers				Soil Buffer Distance
		TDS < = 2500				TDS > 2500								
		R		NR		R		NR		R		NR		
		100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	(feet)
ANTIMONY	7440-36-0	0.6	27	0.6	27	60	2700	60	2700	600	27000	600	27000	15
ARSENIC	7440-38-2	1	29	1	29	100	2900	100	2900	1000	29000	1000	29000	15
BARIUM AND COMPOUNDS	7440-39-3	200	8200	200	8200	20000	190000	20000	190000	190000	190000	190000	190000	15
BERYLLIUM	7440-41-7	0.4	320	0.4	320	40	32000	40	32000	400	190000	400	190000	10
BORON AND COMPOUNDS	7440-42-8	600	1900	600	1900	60000	190000	60000	190000	190000	190000	190000	190000	30
CADMIUM	7440-43-9	0.5	38	0.5	38	50	3800	50	3800	500	38000	500	38000	15
CHROMIUM (III)	16065-83-1	10	190000	10	190000	1000	190000	1000	190000	10000	190000	10000	190000	5
CHROMIUM (VI)	18540-29-9	10	190	10	190	1000	19000	1000	19000	10000	190000	10000	190000	15
COBALT	7440-48-4	1	45	2.9	130	100	4500	290	13000	1000	45000	2900	130000	15
COPPER	7440-50-8	100	43000	100	43000	10000	190000	10000	190000	100000	190000	100000	190000	10
CYANIDE, FREE	57-12-5	20	200	20	200	2000	20000	2000	20000	20000	190000	20000	190000	20
FLUORIDE	16984-48-8	400	44	400	44	40000	4400	40000	4400	190000	44000	190000	44000	NA
LEAD	7439-92-1	0.5	450	0.5	450	50	45000	50	45000	500	190000	500	190000	10
LITHIUM	7439-93-2	6.9	2100	19	5700	690	190000	1900	190000	6900	190000	19000	190000	10
MANGANESE	7439-96-5	30	2000	30	2000	3000	190000	3000	190000	30000	190000	30000	190000	15

NO LEAD OR CADMIUM REDUCTIONS PROPOSED FOR SOIL TO GROUNDWATER VALUES

Clean Fill Impacts

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Proposed Statewide Health Standards

REGULATED SUBSTANCE	CASRN	Residential 0—15 feet		Nonresidential Surface Soil 0—2 feet		Nonresidential Subsurface Soil 2—15 feet	
PEBULATE	1114-71-2	[10,000] **150**	[C] **G**	[10,000] **2,200**	[C] **G**	10,000	C
PENTACHLOROBENZENE	608-93-5	180	G	2,600	G	190,000	C
PENTACHLOROETHANE	76-01-7	210	G	1,000	G	10,000	C
PENTACHLORONITROBENZENE	82-68-8	72	G	350	G	190,000	C
PENTACHLOROPHENOL	87-86-5	47	G	230	G	190,000	C
PERFLUOROBUTANE SULFONATE (PFBS)	375-73-5	66	G	960	G	10,000	C
PERFLUOROBUTANOIC ACID (PFBA)	**375-22-4**	**220**	**G**	**3,200**	**G**	**190,000**	**C**
PERFLUOROHEXANOIC ACID (PFHxA)	**307-24-4**	**110**	**G**	**1,600**	**G**	**10,000**	**C**
PERFLUOROOCTANE SULFONATE (PFOS)	1763-23-1	[4.4] **0.68**	G	[64] **9.9**	G	190,000	C
PERFLUOROOCTANOIC ACID (PFOA)	335-67-1	[4.4] **0.86**	G	[64] **12**	G	190,000	C
PHENACETIN	62-44-2	8,500	G	41,000	G	190,000	C
PHENANTHRENE	85-01-8	66,000	G	190,000	C	190,000	C
PHENOL	108-95-2	3,800	N	16,000	N	18,000	N
PHENYL MERCAPTAN	108-98-5	220	G	3,200	G	10,000	C
PHENYLENEDIAMINE, M-	108-45-2	1,300	G	19,000	G	190,000	C
PHENYLPHENOL, 2-	90-43-7	9,600	G	47,000	G	190,000	C
PHORATE	298-02-2	[44] **37**	G	[640] **540**	G	10,000	C
PHTHALIC ANHYDRIDE	85-44-9	380	N	1,600	N	1,800	N
PICLORAM	1918-02-1	15,000	G	190,000	C	190,000	C
POTASSIUM PERFLUOROBUTANE SULFONATE	**29420-49-3**	**66**	**G**	**960**	**G**		

PFAS Reduced, Adding New Compounds

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B. Soil to Groundwater Numeric Values[1]

REGULATED SUBSTANCE	CASRN	Used Aquifers								Nonuse Aquifers				Soil Buffer Distance (feet)
		TDS ≤ 2500 mg/L				TDS > 2500 mg/L								
		Residential		Nonresidential		Residential		Nonresidential		Residential		Nonresidential		
		100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	100 X GW MSC	Generic Value	
PERFLUOROHEXANOIC ACID (PFHxA)	**307-24-4**	**1.7**	**N/A**	**4.9**	**N/A**	**170**	**N/A**	**490**	**N/A**	**1.7**	**N/A**	**4.9**	**N/A**	**NA**
PERFLUOROOCTANE SULFONATE (PFOS)	1763-23-1	[0.007] **0.0018**	N/A	[0.007] **0.0018**	N/A	[0.7] **0.18**	N/A	[0.7] **0.18**	N/A	[0.007] **0.0018**	N/A	[0.007] **0.0018**	N/A	NA
PERFLUOROOCTANOIC ACID (PFOA)	335-67-1	[0.007] **0.0014**	N/A	[0.007] **0.0014**	N/A	[0.7] **0.14**	N/A	[0.7] **0.14**	N/A	[0.007] **0.0014**	N/A	[0.007] **0.0014**	N/A	NA
PHENACETIN	62-44-2	30	12	E 120	46	E 3,000	1,200	E 12,000	4,600	E 30,000	12,000	E 76,000	29,000	E NA

PFAS Reduced, Adding New Compounds

Proposed Statewide Health Standards
STATUS MARCH 2025

From: Sterling, Brie <bsterling@pa.gov>
Sent: Tuesday, March 11, 2025 10:59 AM
To: Walter Hungarter <whungarter@rtenv.com>
Cc: Brown, C David <cdbrown@pa.gov>
Subject: RE: [External] Act 2 Standard Update 2025

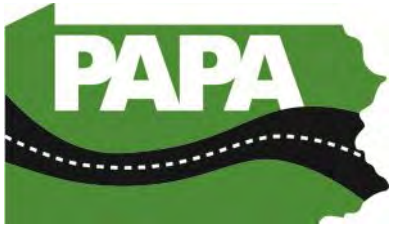
Good morning,

We are currently planning to present the final regulations to the EQB in the 3rd quarter of 2025 and have them published as final before the end of the year. This is not guaranteed to happen, but this is our current plan.

Please let me know if you have any other questions.

Thank you,
Brie

Brie Sterling | Environmental Group Manager
Department of Environmental Protection | Bureau of Environmental Cleanup and Brownfields
Rachel Carson State Office Building
400 Market Street | Harrisburg, PA 17105-8471
Phone: 717.783.9469 | Fax: 717.772.5598
www.dep.pa.gov

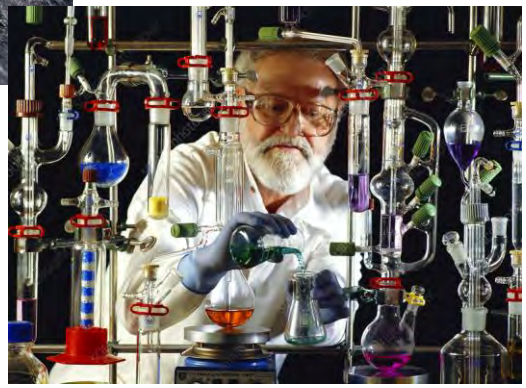


Impact of 2024 Proposed Statewide Health Standards

REMEMBER THAT DEP STATEWIDE HEALTH STANDARDS ARE USED AS THE CLEAN FILL STANDARDS

- Clean Fill Determined by Due Diligence

- Clean Fill Determined by Analytical Testing



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Impact of 2024 Proposed Statewide Health Standards

REMEMBER THAT DEP STATEWIDE HEALTH STANDARDS ARE USED AS THE CLEAN FILL STANDARDS

SOIL CLEAN FILL STANDARDS AND LABORATORY DATA

- Lower of Direct Contact and Soil to Groundwater Generic Value
    - Currently Lead CF Value 450 mg/kg (based on Soil to Groundwater Value)
    - Proposed Lead CP Value 200 mg/kg (based on Direct Contact Value)
    - Currently Cadmium CF Value 38 mg/kg (based on Soil to Groundwater Value)
    - Proposed Cadmium Value 22 mg/kg (based on Direct Contact Value)

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Impact of 2024 Proposed Statewide Health Standards

REMEMBER THAT DEP STATEWIDE HEALTH STANDARDS ARE USED AS THE CLEAN FILL STANDARDS

SOIL CLEAN FILL STANDARDS AND LABORATORY DATA

- Lower of Direct Contact and Soil to Groundwater Generic Value
  - Currently PFOS 4.4 mg/kg Direct Contact
  - Proposed PFOS 0.68 mg/kg Direct Contact
  - Currently PFOA 4.4 mg/kg Direct Contact
  - Proposed PFOA 0.86 mg/kg Direct Contact
  - NO GENERIC VALUE FOR PFAS. Groundwater Standards for PFAS are much Lower!! SO DIRECT CONTACT DRIVES CLEAN FILL VALUES

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Impact of 2024 Proposed Statewide Health Standards

REMEMBER THAT DEP STATEWIDE HEALTH STANDARDS ARE USED AS THE CLEAN FILL STANDARDS

SOIL CLEAN FILL STANDARDS AND LABORATORY DATA

- Default to Direct Contact
  - New PFAS
  - PFBA 220 mg/kg (Direct Contact)
  - PFHxA 110 mg/kg (Direct Contact)
  - PFBS 66 mg/kg (Direct Contact)
  - HFPO [GEN-X] and Salts 0.66 mg/kg (Direct Contact)

Impact of 2024 Proposed Statewide Health Standards

Groundwater Standards will also be Updated!!

- Important for Water Management at Construction Sites
- NPDES Permitting Impacts (TOPIC FOR ANOTHER TIME)
- Health and Safey Impacts (TOPIC FOR ANOTHER TIME)

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Future Proposed Statewide Health Standards

3-YEAR CYCLE FOR REVIEW

- Statewide Health Standards are Risked Based Standards
- EPA Proposed New Toxicity Values which WILL impact SHS
- Arsenic reduced over an order of Magnitude (EPA Regional Screening Level) for Residential and Non-Residential Situations
- Finalize in May of 2025 (BUT WE'LL SEE WHAT HAPPENS)

- DEP can do interim update after the SHS are Finalized Later This Year
- Or can incorporate into the current version.

- Either way, anticipate that after more than 20+ years dealing with an arsenic standard lower than BACKGROUND, the standard will likely be lower!

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Clean Fill
Due Diligence Vs. Testing

- Clean Fill Does NOT Default to Testing (even though it seems to be the case for every receiving site)
- Due Diligence push may become more of a priority!
- Due Diligence is Defined in Management of Fill Policy (Clean Fill)
- Could be a full Phase I or Could be an Environmental Review
- Focus on Sources for Environmental Review

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HistoricAerials.com

General Atlas View of Project Area

Topographic Images over Many Years

Aerial Photographs over Many Years

FREE TO VIEW!!!!!!

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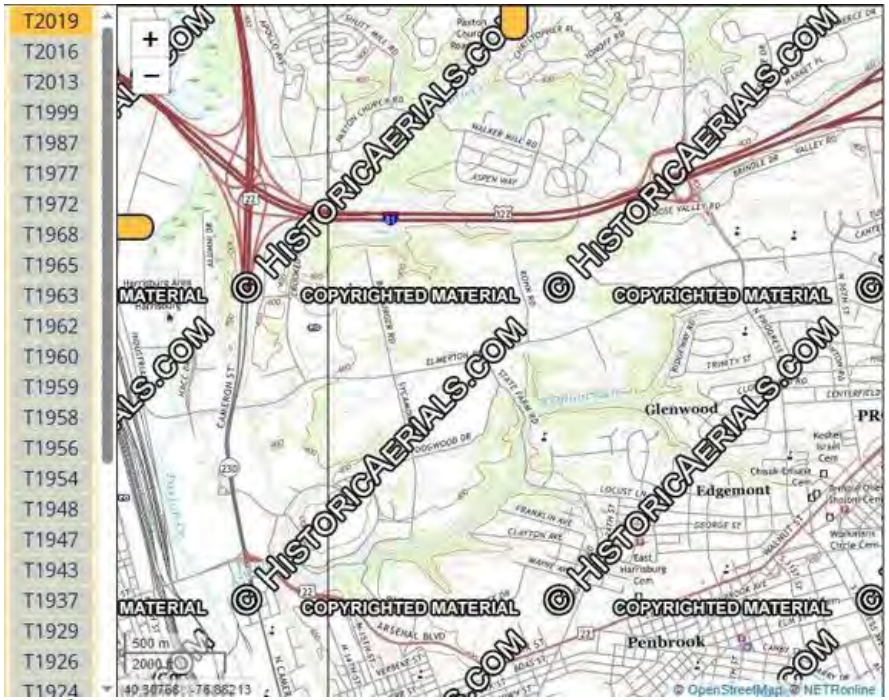
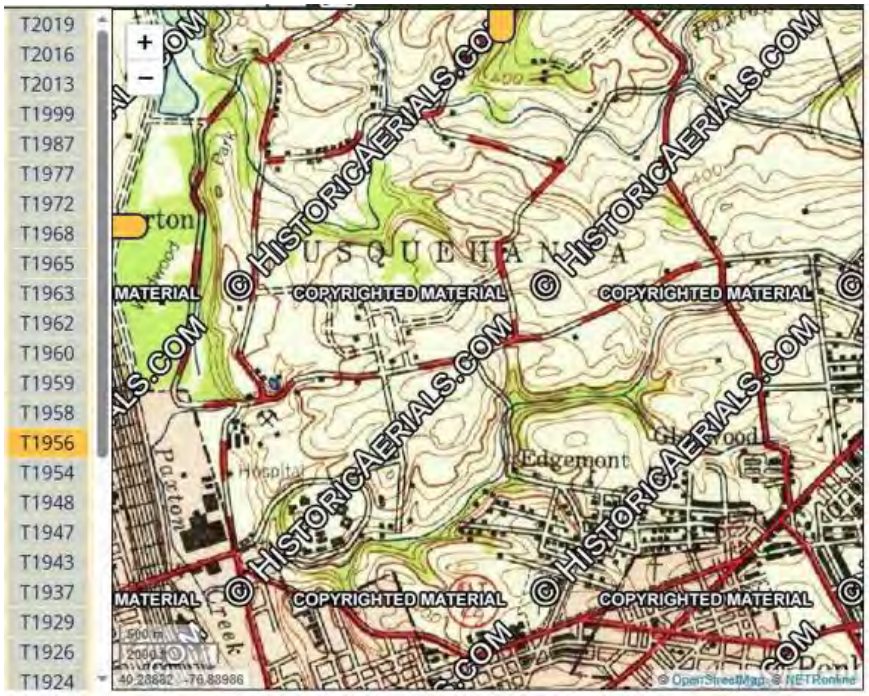
Topographic Images over Many Years





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HistoricAerials.com

Aerial Images over Many Years

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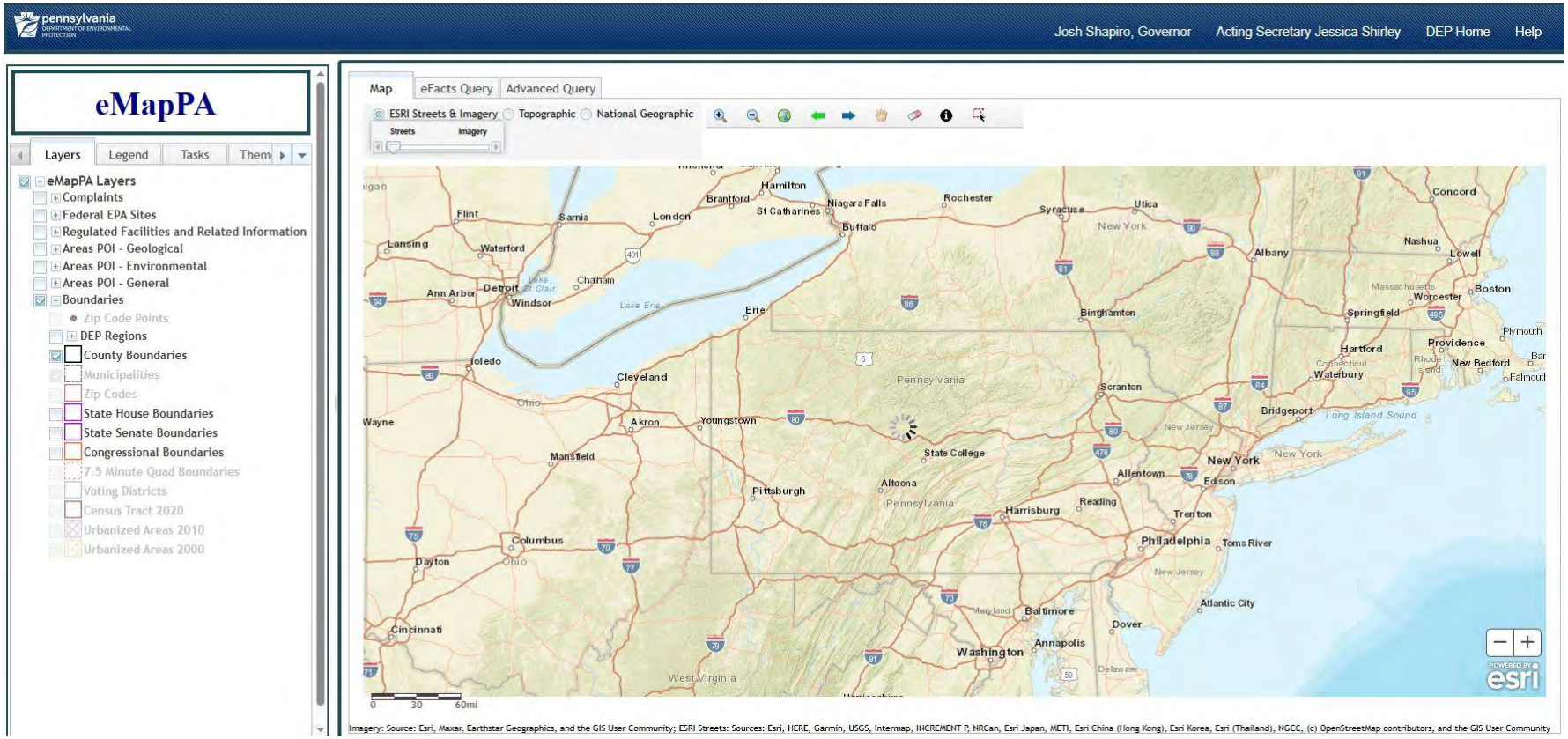
eMapPA **(IT'S FREE!)**



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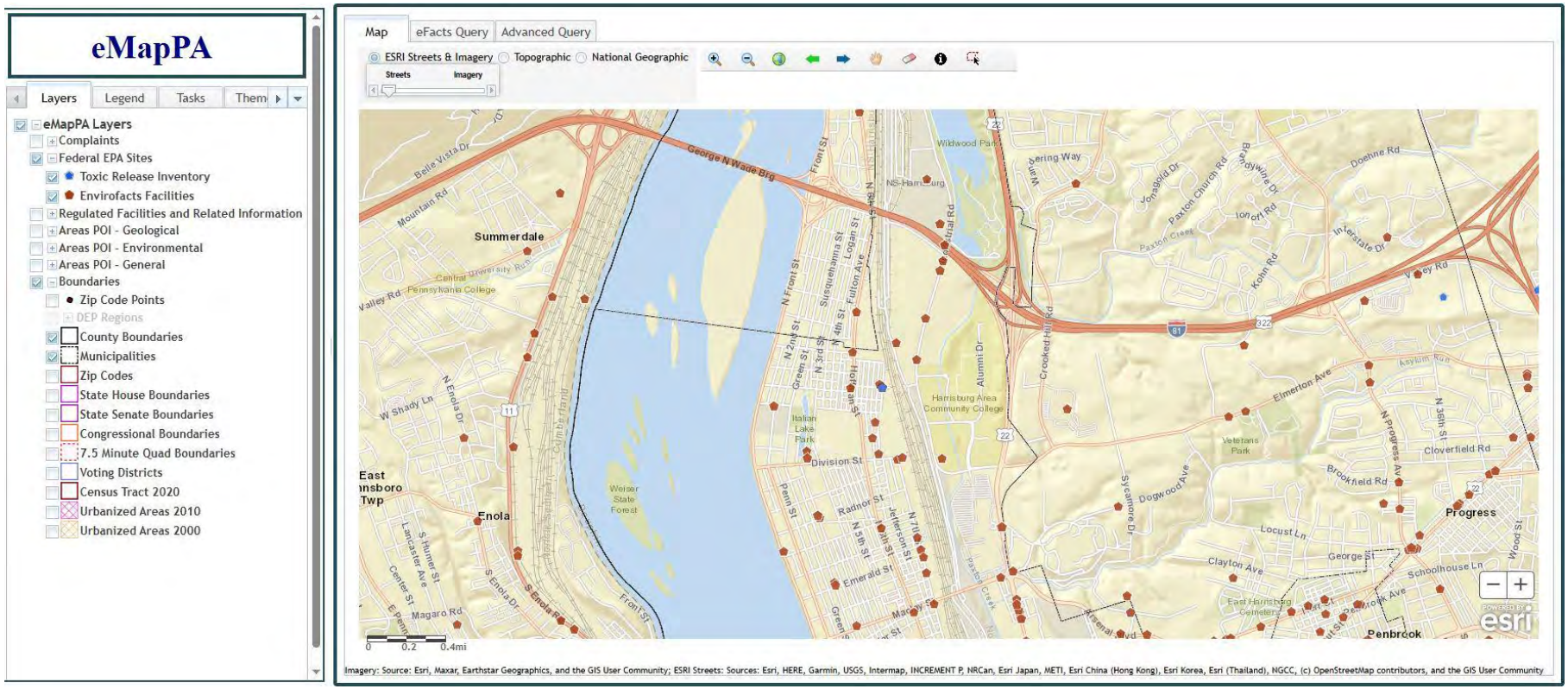

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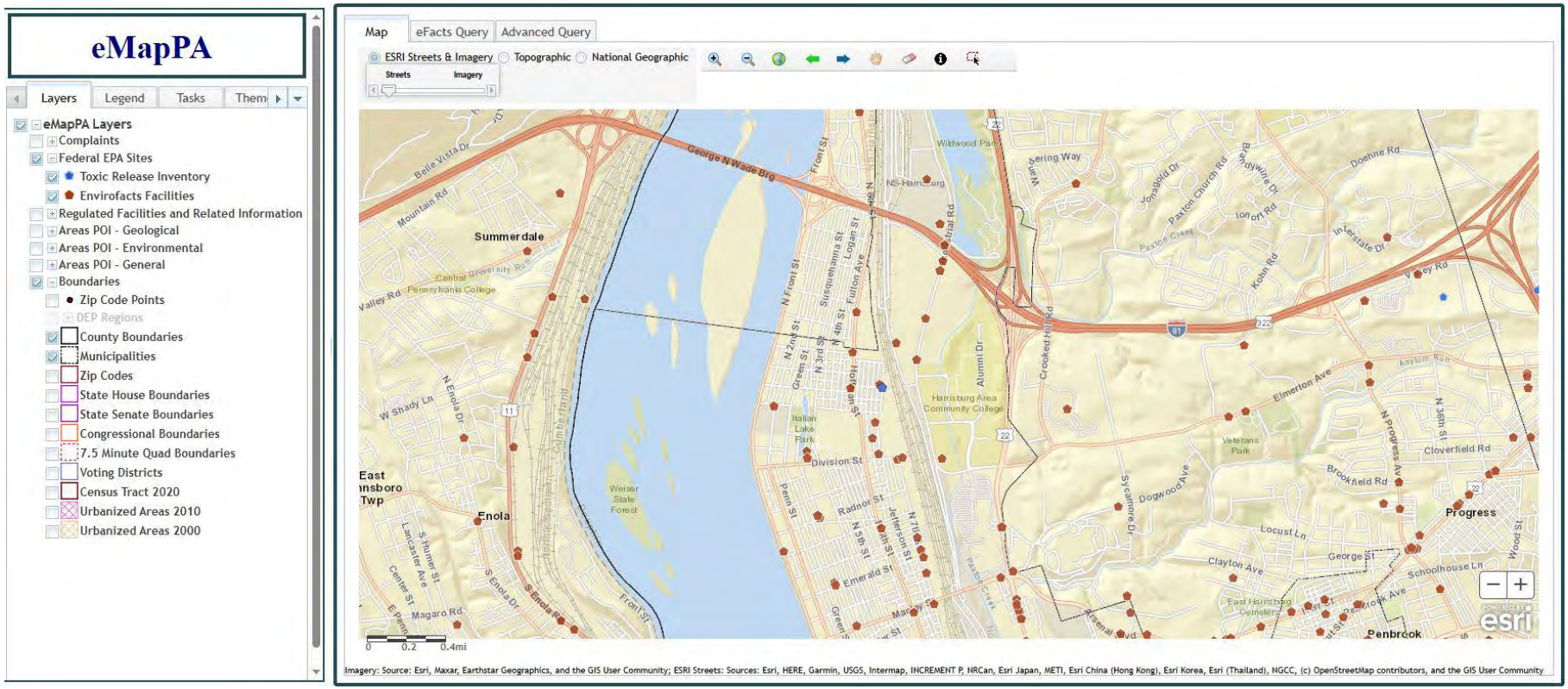

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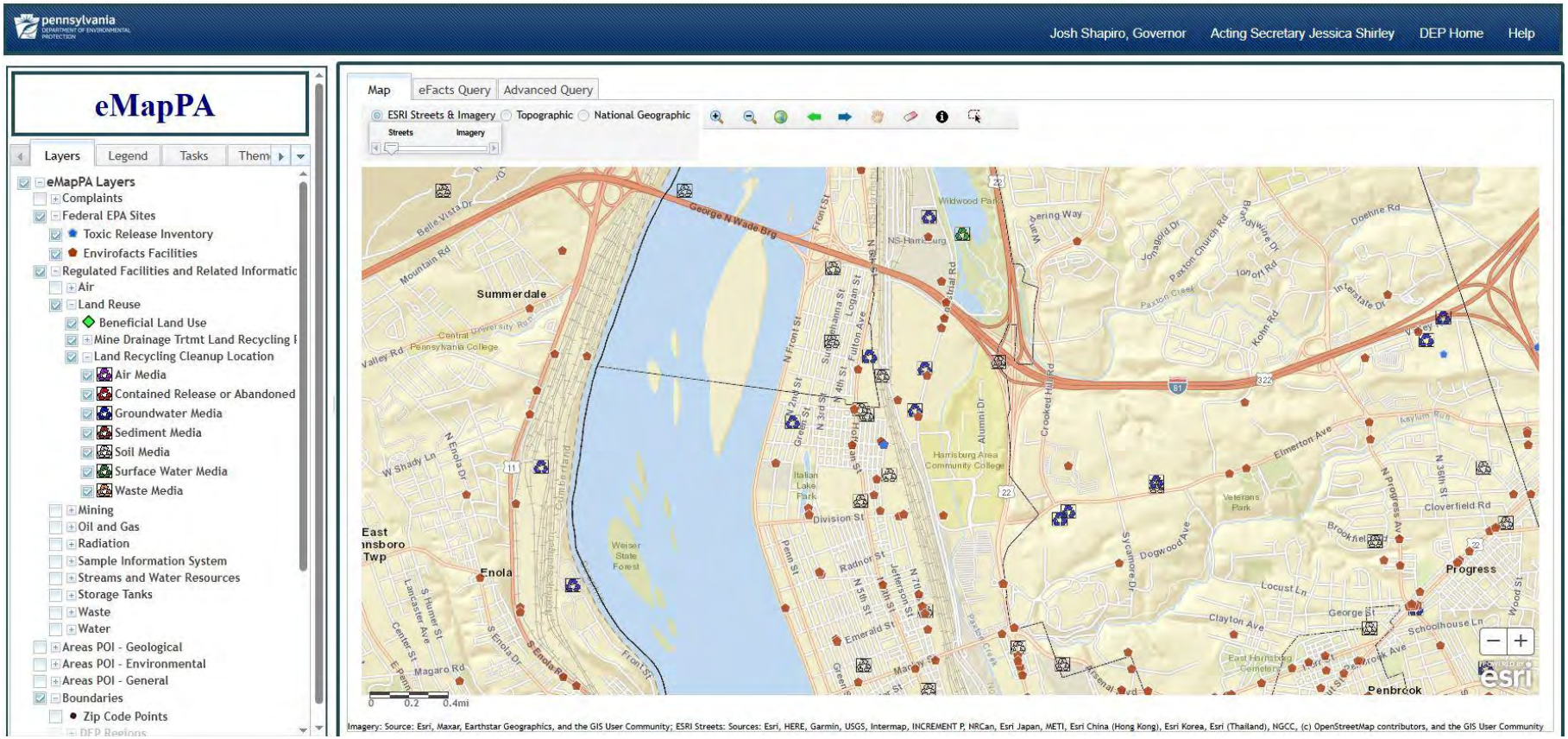

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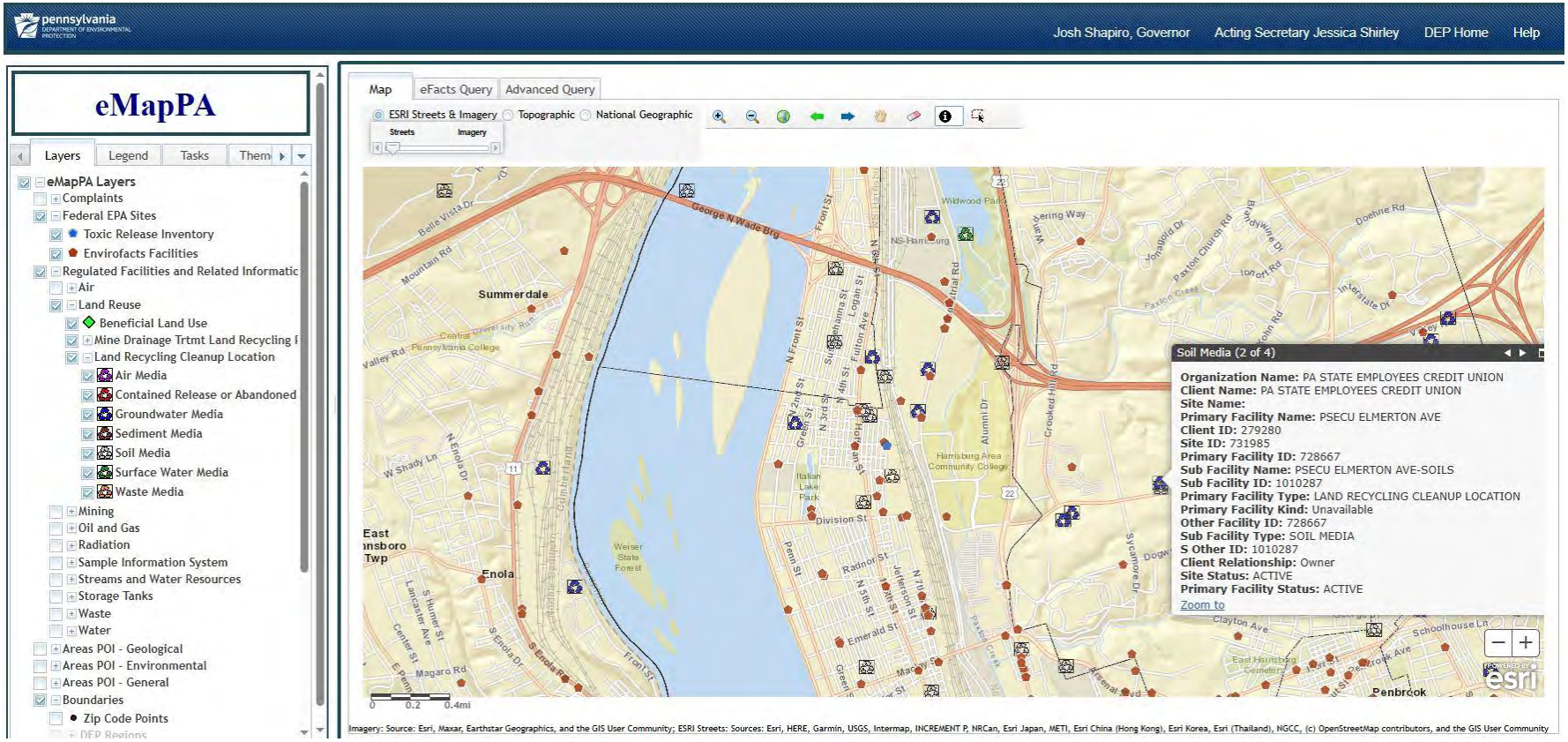

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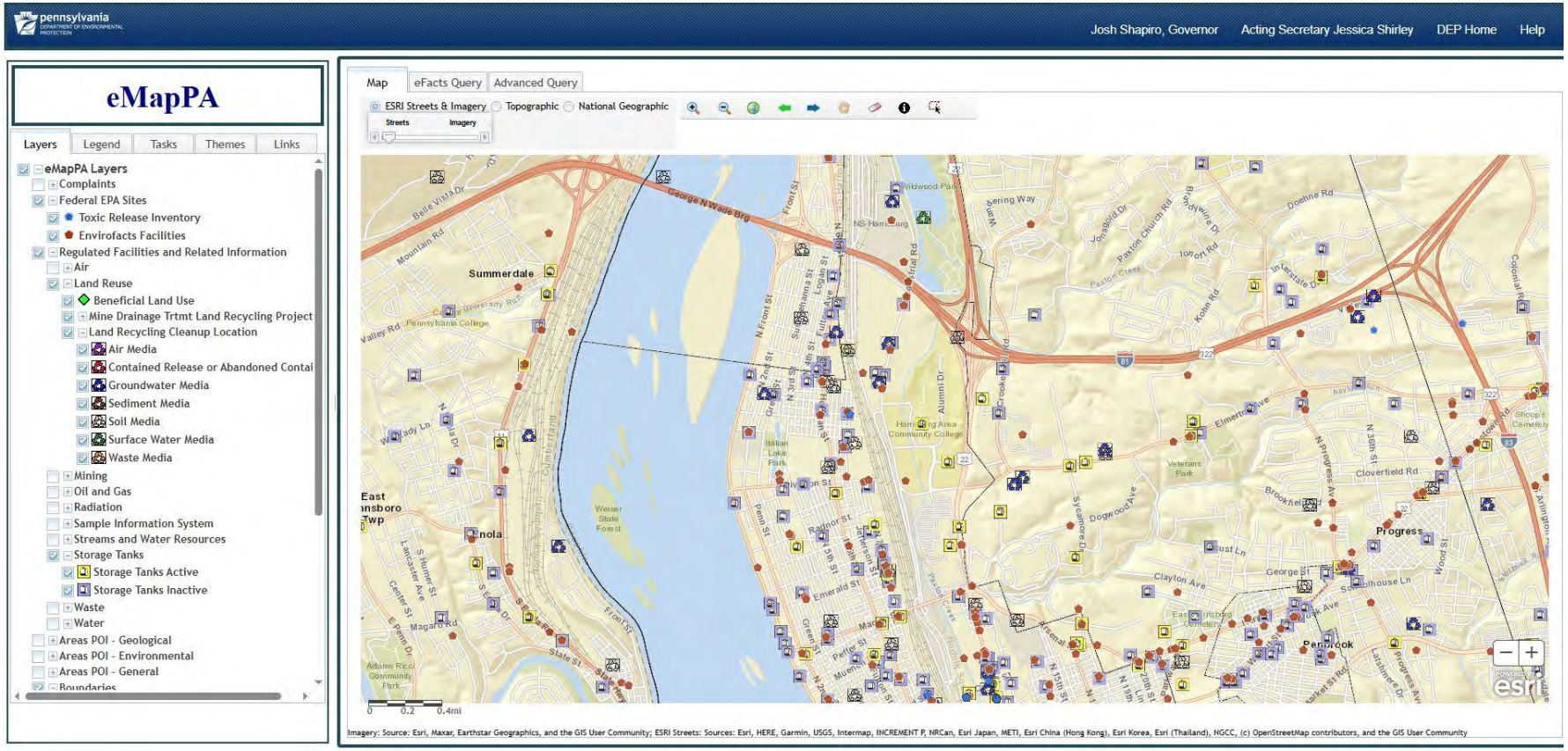

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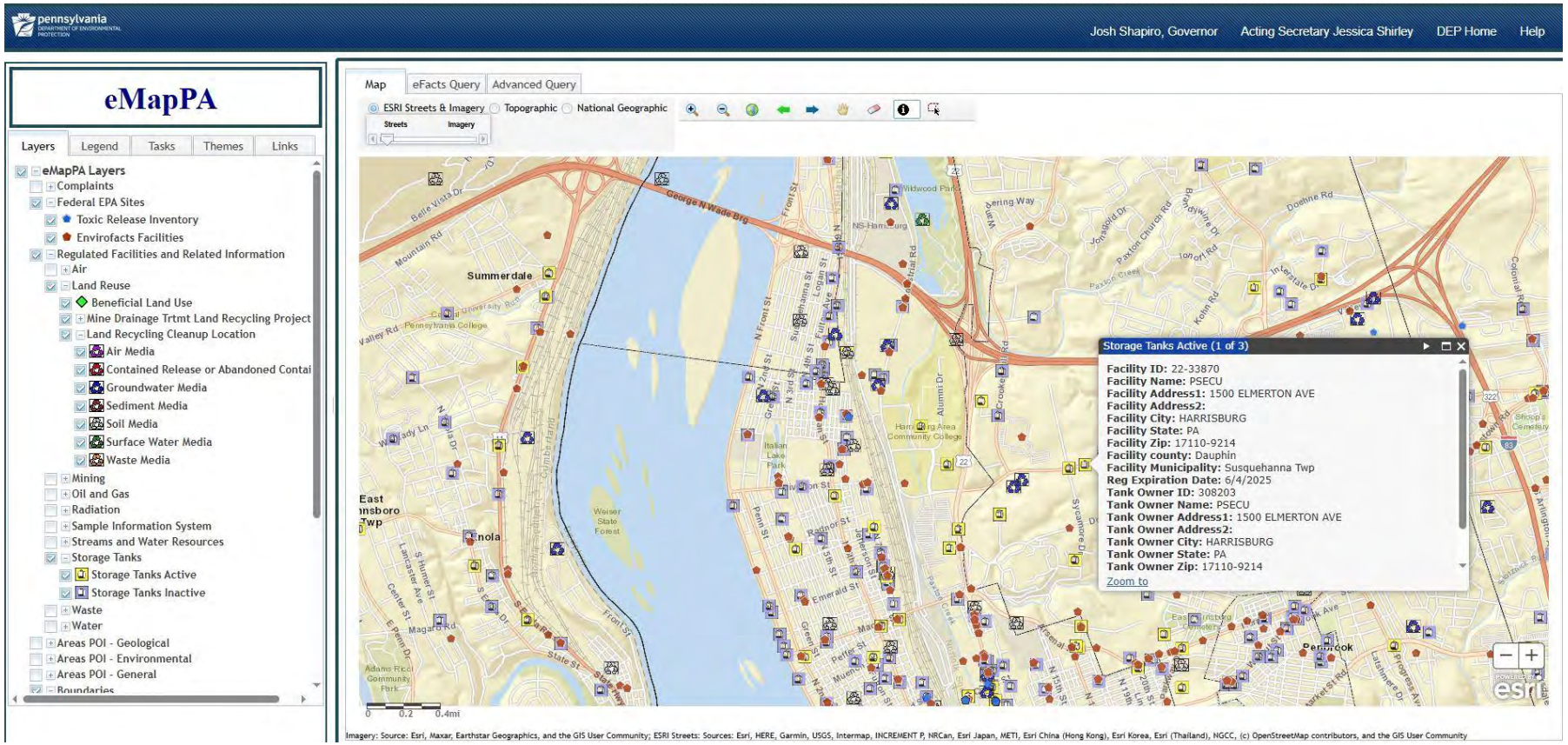

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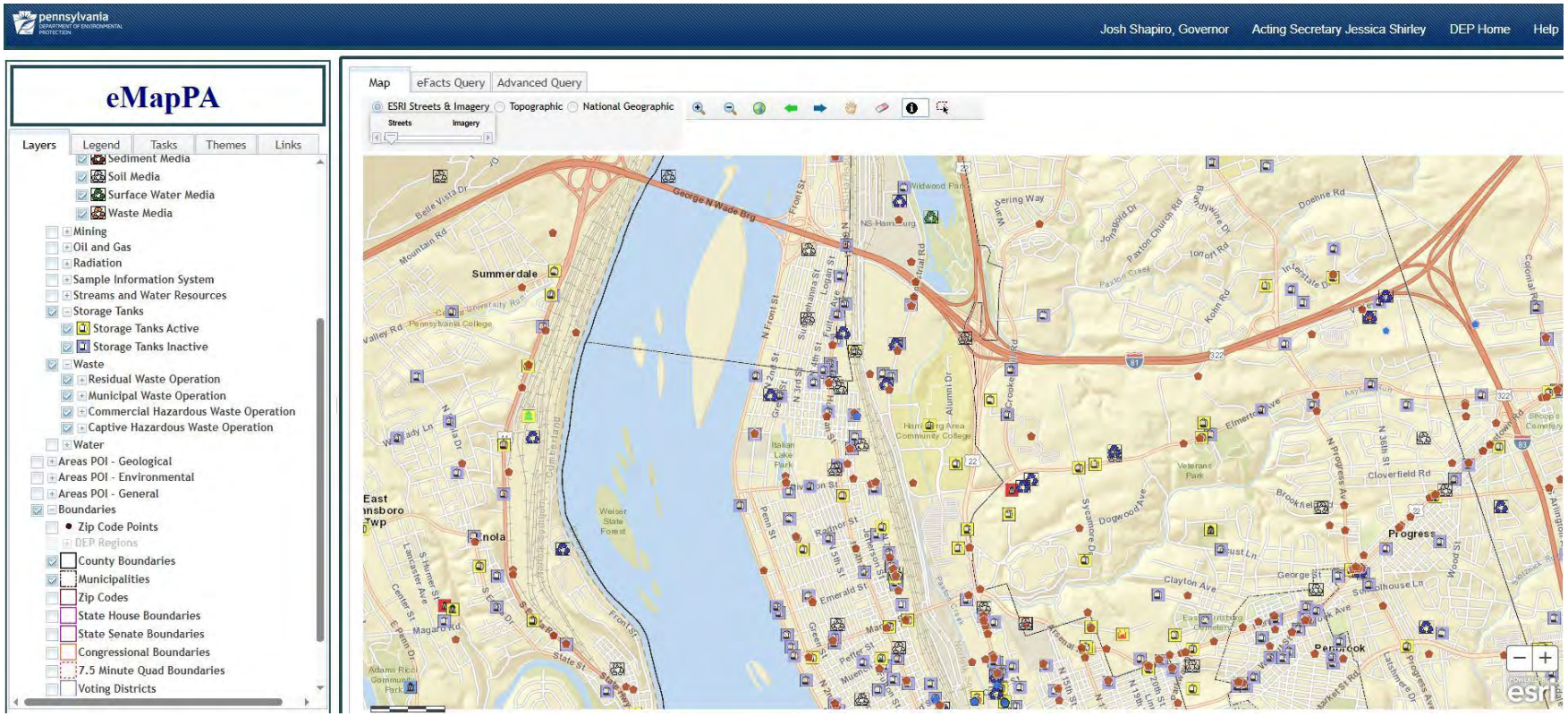

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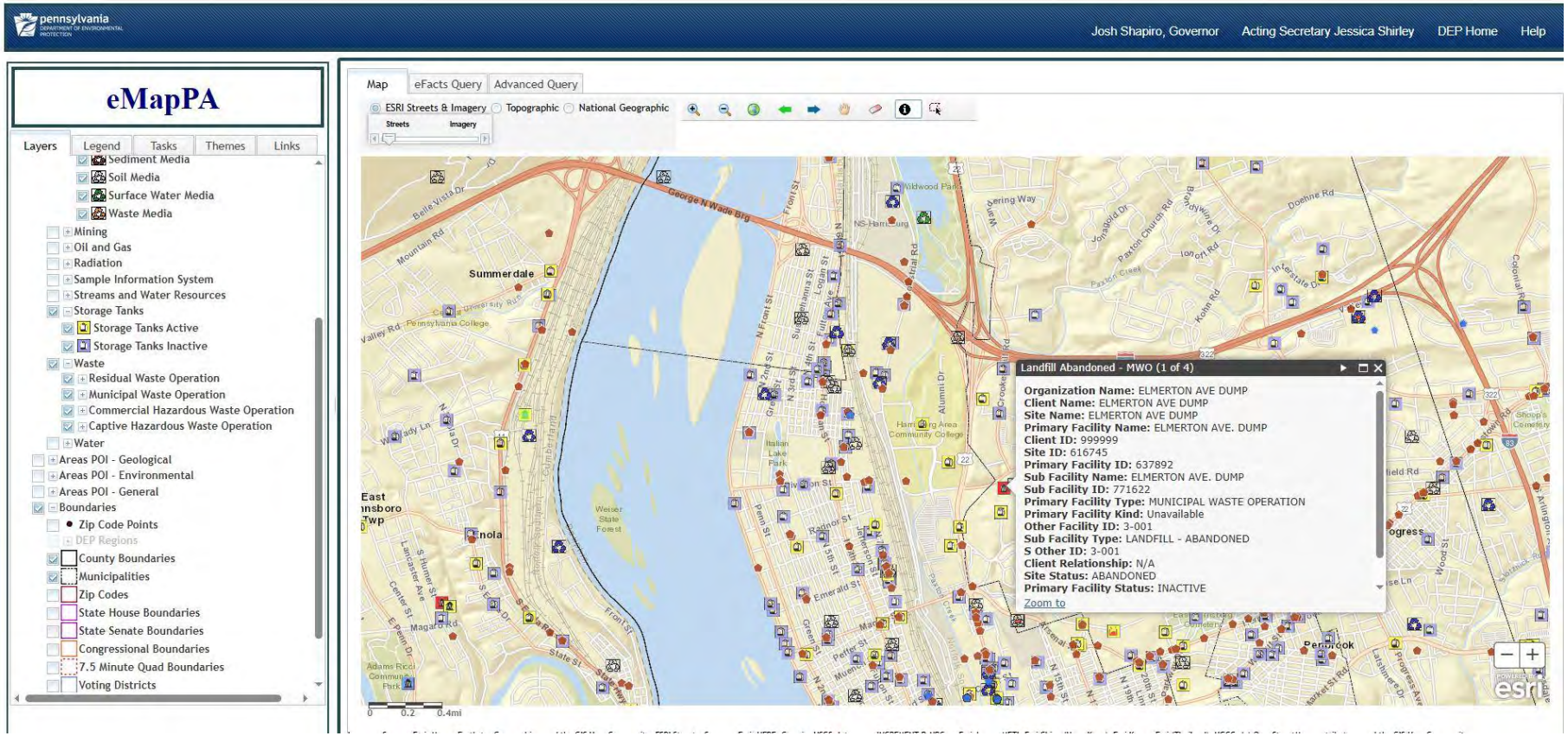

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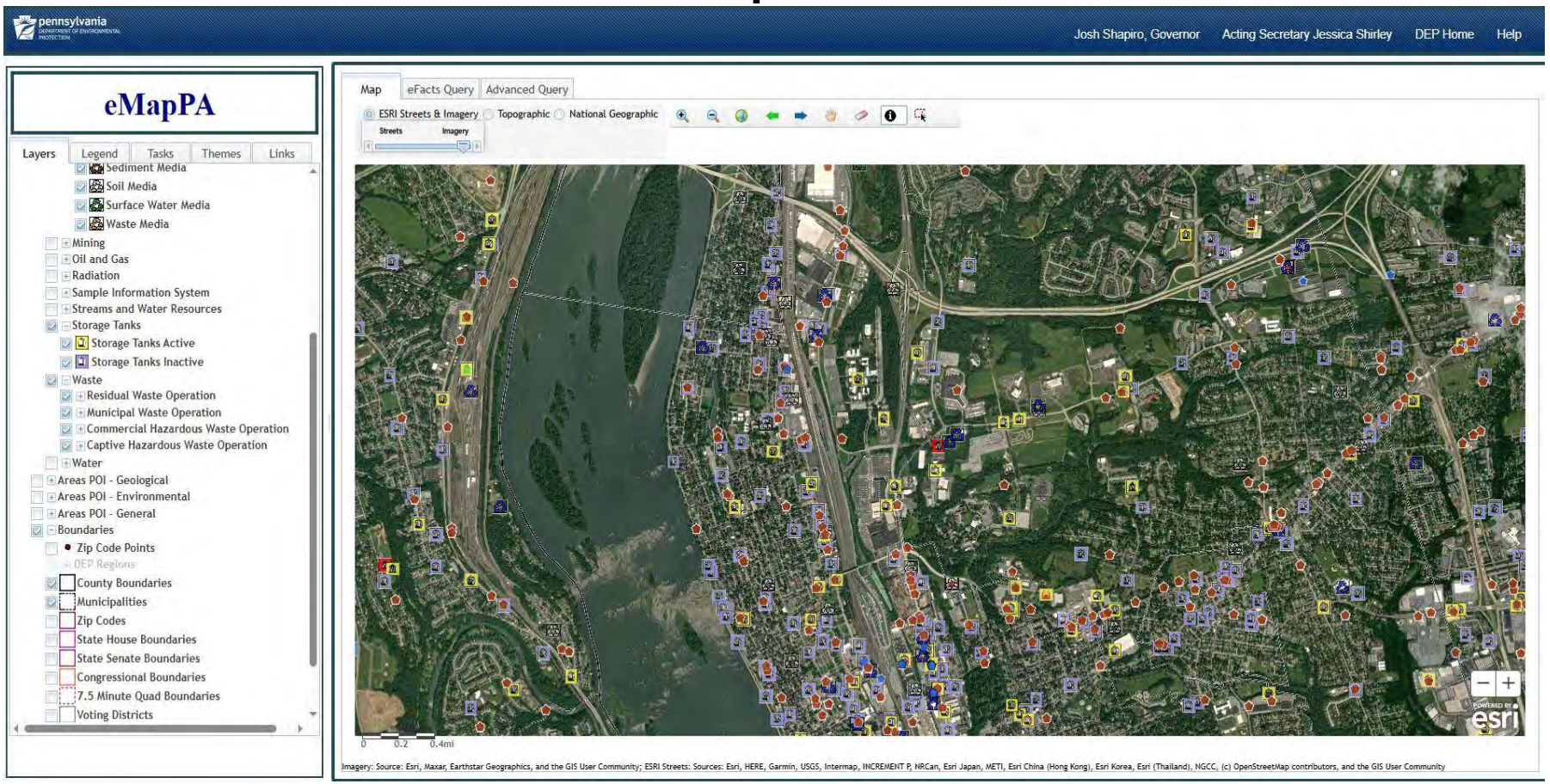

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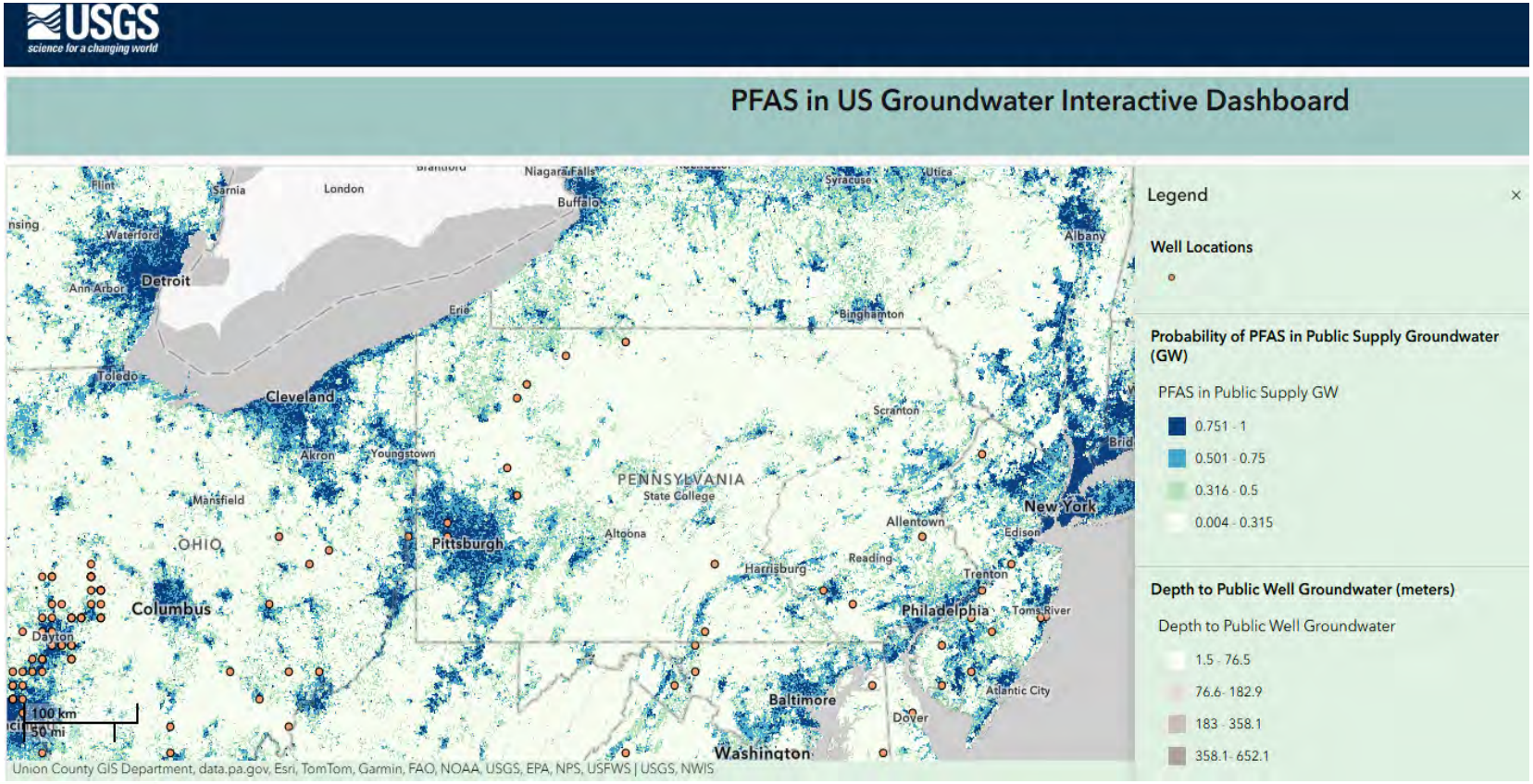
PFAS Due Diligence

US EPA, USGS, PA DEP – Numerous Other Sources Available
MOSTLY Focused on GROUNDWATER AND SURFACE WATER



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PFAS Due Diligence

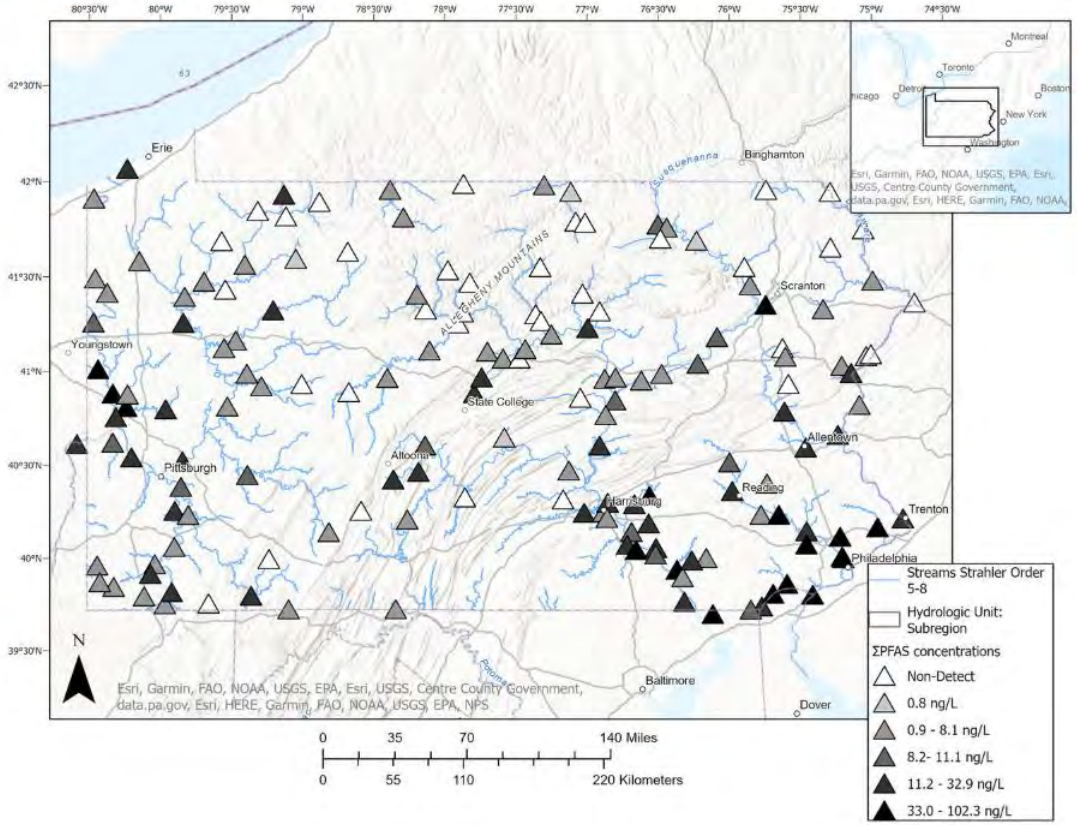
USGS science for a changing world

SCIENCE PRODUCTS NEWS CONNECT ABOUT Latest Earthquakes

IMAGES | ILLUSTRATIONS

Pennsylvania state-wide surface water PFAS study

By Communications and Publishing AUGUST 21, 2023



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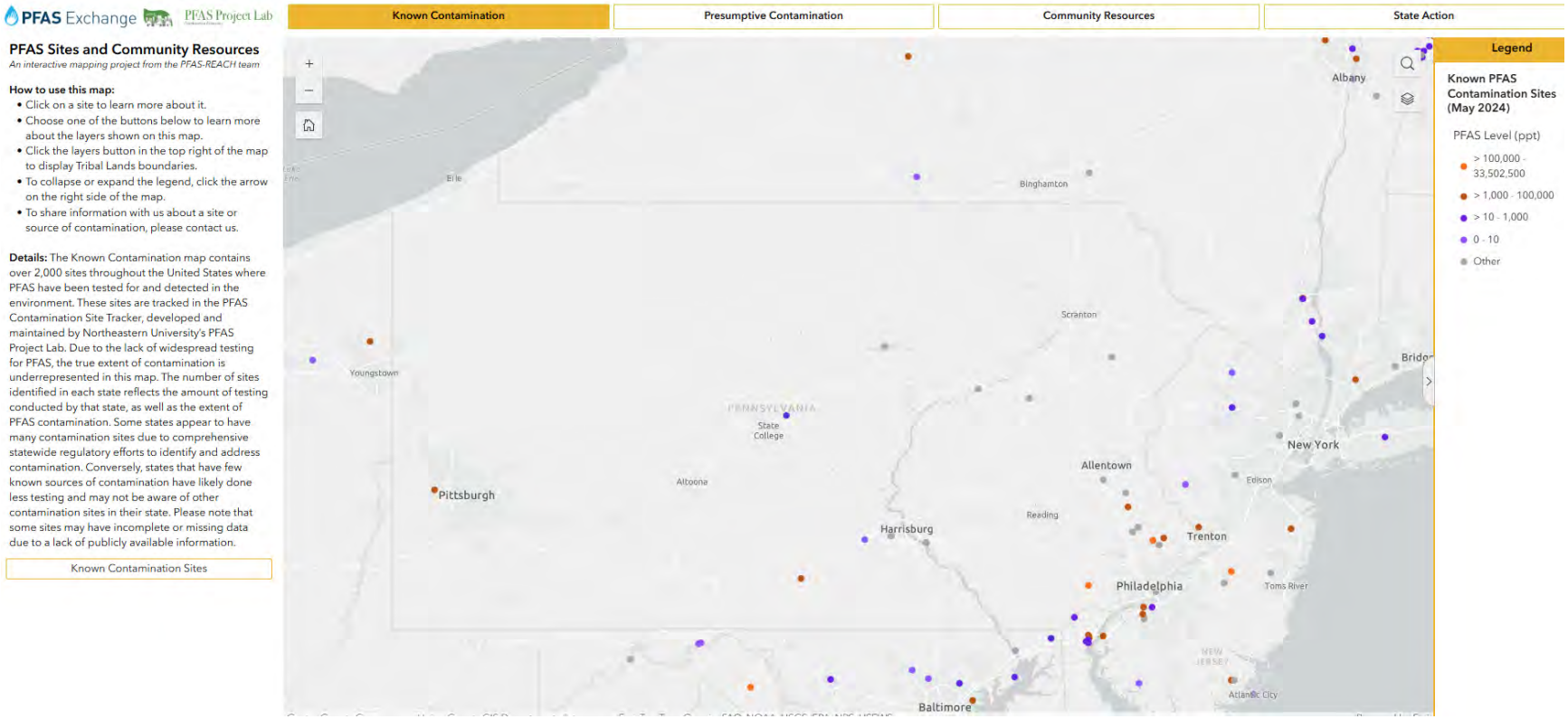
PFAS Due Diligence



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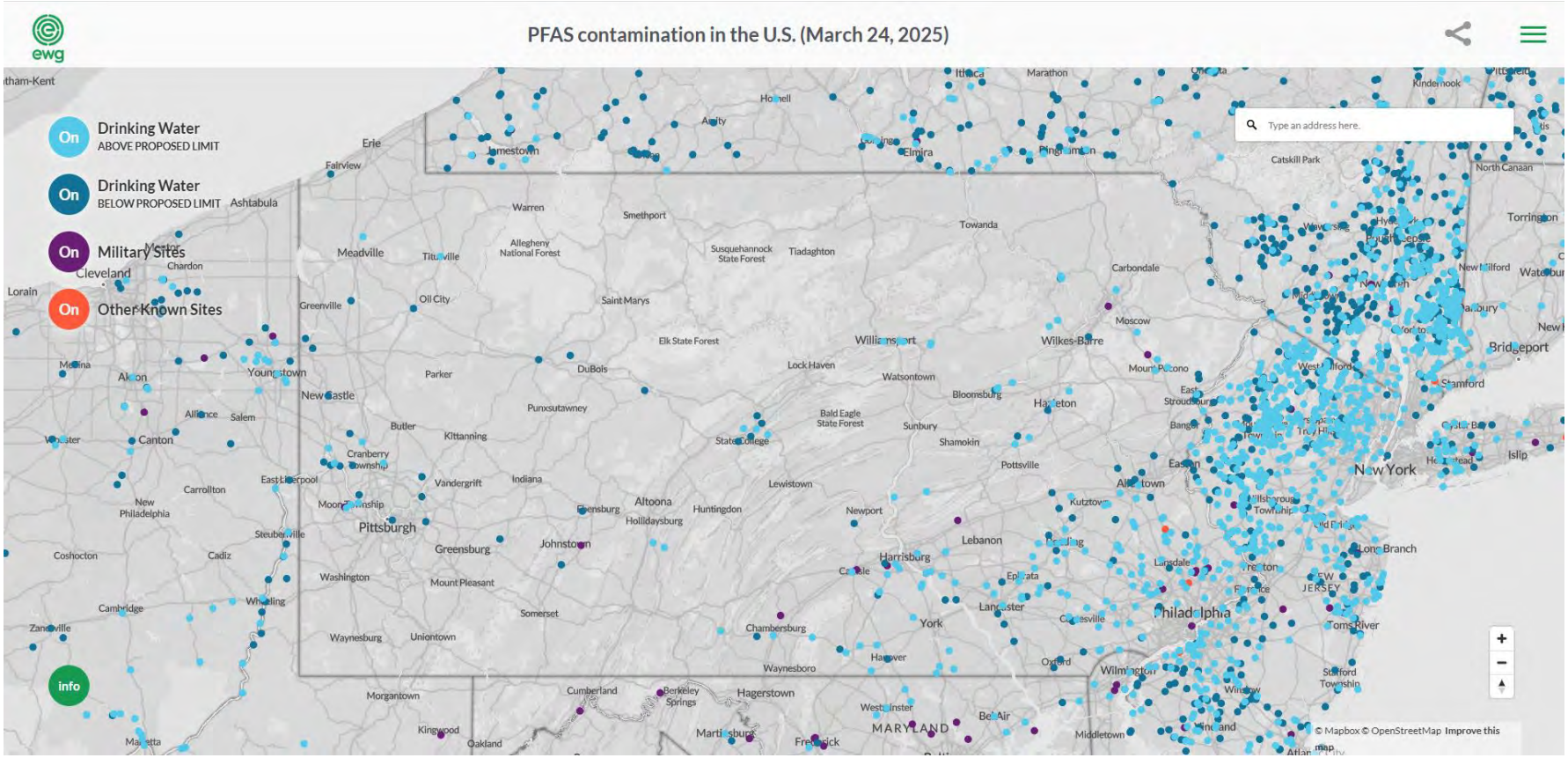
PFAS Due Diligence



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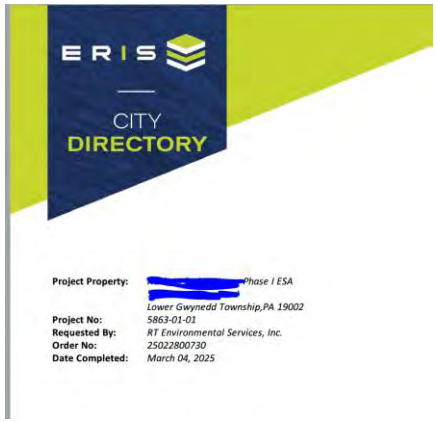
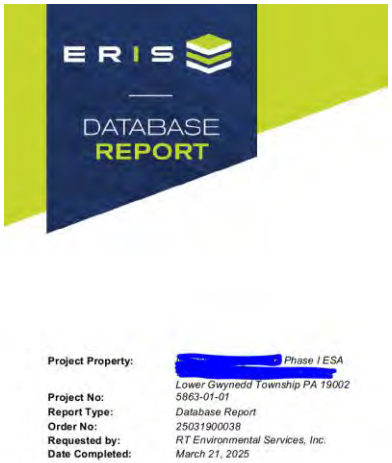
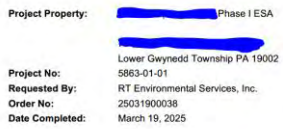
RT Environmental Services, Inc.

Due Diligence Database Services

- ERIS or EDR Reports (typically part of Phase I ESA)
- Can be Purchased Outside of a Phase I







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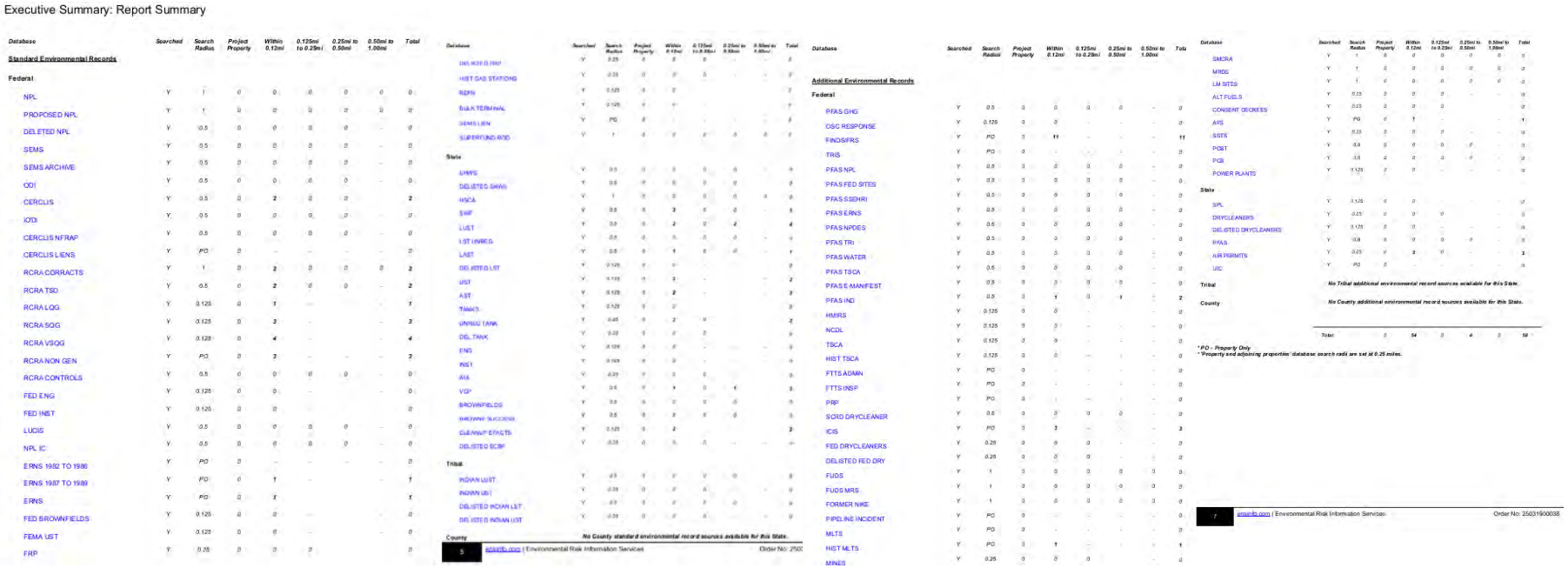
RT Environmental Services, Inc.

Due Diligence Database Services

- More Aerials, and Topographic Maps
- More Environmental Databases on Your Site AND in Your Project Area
- City Directory Listings for former Businesses In Project Area (can find listing of potential owners who could contaminate sites)



Executive Summary: Report Summary

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
Standard Environmental Records								
Federal								
NPL	Y	1	0	0	0	0	0	0
PROPOSED NPL	Y	1	0	0	0	0	0	0
DELETED NPL	Y	0.5	0	0	0	0	-	0
SEMS	Y	0.5	0	0	0	0	-	0
SEMS ARCHIVE	Y	0.5	0	0	0	0	-	0
ODI	Y	0.5	0	0	0	0	-	0
CERCLIS	Y	0.5	0	2	0	0	-	2
IODI	Y	0.5	0	0	0	0	-	0
CERCLIS NFRAP	Y	0.5	0	0	0	0	-	0
CERCLIS LIENS	Y	PO	0	-	-	-	-	0
RCRA CORRACTS	Y	1	0	2	0	0	0	2
RCRA TSD	Y	0.5	0	2	0	0	-	2
RCRA LQG	Y	0.125	0	1	-	-	-	1
RCRA SQG	Y	0.125	0	3	-	-	-	3
RCRA VSQG	Y	0.125	0	4	-	-	-	4
RCRA NON GEN	Y	PO	0	3	-	-	-	3
RCRA CONTROLS	Y	0.5	0	0	0	0	-	0
FED ENG	Y	0.125	0	0	-	-	-	0
FED INST	Y	0.125	0	0	-	-	-	0
LUCIS	Y	0.5	0	0	0	0	-	0
NPL IC	Y	0.5	0	0	0	0	-	0
ERNS 1982 TO 1986	Y	PO	0	-	-	-	-	0
ERNS 1987 TO 1989	Y	PO	0	1	-	-	-	1
ERNS	Y	PO	0	1	-	-	-	1
FED BROWNFIELDS	Y	0.125	0	0	-	-	-	0
FEMA UST	Y	0.125	0	0	-	-	-	0
FRP	Y	0.25	0	0	0	-	-	0

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
DELISTED FRP	Y	0.25	0	0	0	-	-	0
HIST GAS STATIONS	Y	0.25	0	0	0	-	-	0
RBRN	Y	0.125	0	0				0
BULK TERMINAL	Y	0.125	0	0				0
SEMS LIEN	Y	PO	0	-	-	-	-	0
SUPERFUND ROD	Y	1	0	0	0	0	0	0
State								
SHWS	Y	0.5	0	0	0	0	-	0
DELISTED SHWS	Y	0.5	0	0	0	0	-	0
HSCA	Y	1	0	0	0	0	0	0
SWF	Y	0.5	0	0	0	0	-	0
LUST	Y	0.5	0	2	0	2		4
LIST UNREG	Y	0.5	0	0	0	0	-	0
LAST	Y	0.5	0	1	0	0	-	1
DELISTED LST	Y	0.125	0	0				0
UST	Y	0.125	0	2	-	-	-	2
AST	Y	0.125	0	2	-	-	-	2
TANKS	Y	0.125	0	0	-	-	-	0
UNREG TANK	Y	0.25	0	2	0			2
DEL TANK	Y	0.25	0	0	0			0
ENG	Y	0.125	0	0	-	-	-	0
INST	Y	0.125	0	0	-	-	-	0
AUL	Y	0.25	0	0	0			0
VCP	Y	0.5	0	1	0	1		2
BROWNFIELDS	Y	0.5	0	0	0	0		0
BROWNF SUCCESS	Y	0.5	0	2	0	0		2
CLEANUP FACTS	Y	0.125	0	2	-	-	-	2
DELISTED BCBF	Y	0.25	0	0	0	-	-	0
Tribal								
INDIAN LUST	Y	0.5	0	0	0	0	0	0
INDIAN UST	Y	0.25	0	0	0	-	-	0
DELISTED INDIAN LST	Y	0.5	0	0	0	0	0	0
DELISTED INDIAN UST	Y	0.25	0	0	0	-	-	0
County								

No County standard environmental record sources available for this State.

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
Additional Environmental Records								
Federal								
PFAS GHG	Y	0.5	0	0	0	0	-	0
OSC RESPONSE	Y	0.125	0	0	-	-	-	0
FINDS/FRS	Y	PO	0	11	-	-	-	11
TRIS	Y	PO	0	-	-	-	-	0
PFAS NPL	Y	0.5	0	0	0	0	-	0
PFAS FED SITES	Y	0.5	0	0	0	0	-	0
PFAS SSEHRI	Y	0.5	0	0	0	0	-	0
PFAS ERNS	Y	0.5	0	0	0	0	-	0
PFAS NPDES	Y	0.5	0	0	0	0	-	0
PFAS TRI	Y	0.5	0	0	0	0	-	0
PFAS WATER	Y	0.5	0	0	0	0	-	0
PFAS TSCA	Y	0.5	0	0	0	0	-	0
PFAS E-MANIFEST	Y	0.5	0	0	0	0	-	0
PFAS IND	Y	0.5	0	1	0	1	-	2
HMIRS	Y	0.125	0	0	-	-	-	0
NCDL	Y	0.125	0	0	-	-	-	0
TSCA	Y	0.125	0	0	-	-	-	0
HIST TSCA	Y	0.125	0	0	-	-	-	0
FTTS ADMIN	Y	PO	0	-	-	-	-	0
FTTS INSP	Y	PO	0	-	-	-	-	0
PRP	Y	PO	0	-	-	-	-	0
SCRD DRYCLEANER	Y	0.5	0	0	0	0	-	0
ICIS	Y	PO	0	3	-	-	-	3
FED DRYCLEANERS	Y	0.25	0	0	0	-	-	0
DELISTED FED DRY	Y	0.25	0	0	0	-	-	0
FUDS	Y	1	0	0	0	0	0	0
FUDS MRS	Y	1	0	0	0	0	0	0
FORMER NIKE	Y	1	0	0	0	0	0	0
PIPELINE INCIDENT	Y	PO	0	-	-	-	-	0
MLTS	Y	PO	0	-	-	-	-	0
HIST MLTS	Y	PO	0	1	-	-	-	1
MINES	Y	0.25	0	0	0	-	-	0

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
SMCRA	Y	1	0	0	0	0	0	0
MRDS	Y	1	0	0	0	0	0	0
LM SITES	Y	1	0	0	0	0	0	0
ALT FUELS	Y	0.25	0	0	0	-	-	0
CONSENT DECREES	Y	0.25	0	0	0	-	-	0
ARS	Y	PO	0	1	-	-	-	1
SSTS	Y	0.25	0	0	0	-	-	0
PCBT	Y	0.5	0	0	0	0	-	0
PCB	Y	0.5	0	0	0	0	-	0
POWER PLANTS	Y	0.125	0	0	-	-	-	0
State								
SPL	Y	0.125	0	0				0
DRYCLEANERS	Y	0.25	0	0	0	-	-	0
DELISTED DRYCLEANERS	Y	0.125	0	0	-	-	-	0
PFAS	Y	0.5	0	0	0	0	-	0
AIR PERMITS	Y	0.25	0	2	0	-	-	2
UIC	Y	PO	0	-	-	-	-	0
Tribal								

No Tribal additional environmental record sources available for this State.

County								

No County additional environmental record sources available for this State.

Total:	0	54	0	4	0	58

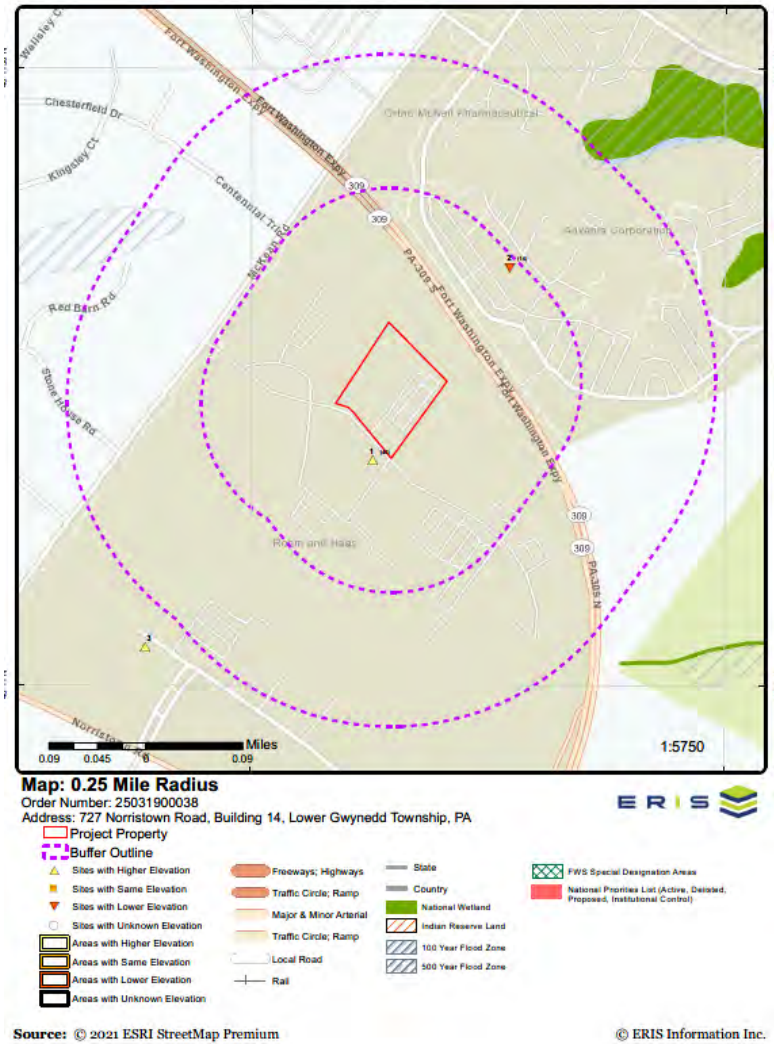
** PO - Property Only*

** Property and adjoining properties' database search radii are set at 0.25 miles.*

RT Environmental Services, Inc.

Due Diligence Database Services

- Site and Surrounding Areas – Potential Due Diligence Concerns?



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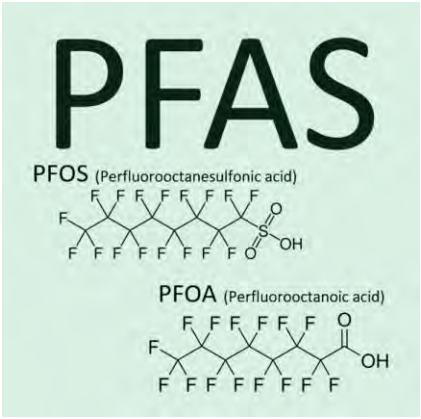
RT Environmental Services, Inc.

Due Diligence Database Services **PFAS**

Database	Searched	Search Radius	Project Property	Within 0.12mi	0.125mi to 0.25mi	0.25mi to 0.50mi	0.50mi to 1.00mi	Total
SMCRA	Y	1	0	0	0	0	0	0
MRDS	Y	1	0	0	0	0	0	0
LM SITES	Y	1	0	0	0	0	0	0
ALT FUELS	Y	0.25	0	0	0	-	-	0
CONSENT DECREES	Y	0.25	0	0	0			0
AFS	Y	PO	0	1	-		-	1
SSTS	Y	0.25	0	0	0	-	-	0
PCBT	Y	0.5	0	0	0	0	-	0
PCB	Y	0.5	0	0	0	0	-	0
POWER PLANTS	Y	0.125	0	0	-	-	-	0
State								
SPL	Y	0.125	0	0	-	-	-	0
DRYCLEANERS	Y	0.25	0	0	0		-	0
DELISTED DRYCLEANERS	Y	0.125	0	0	-	-	-	0
PFAS	Y	0.5	0	0	0	0	-	0
AIR PERMITS	Y	0.25	0	3	0	-	-	3
UIC	Y	PO	0	-	-	-	-	0
Tribal	*No Tribal additional environmental record sources available for this State.*							

PFAS Due Diligence

- Potential Impacts for Projects – Soil and Groundwater Management, Clean Fill, Health and Safety
- Free Sources for Due Diligence
- Paid Database Service Providers
- Environmental Consultant – Phase I ESAs



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RT Environmental Services, Inc.

- Proposed Statewide Health Standards
  - Changes Currently Proposed Likely Effective 2026 Construction Season
  - Future Changes (Arsenic)

- Due Diligence Resources
  - Spend Some Time on Due Diligence and Decide IF Testing is Needed OR NOT
    - Receiving Party of Clean Fill and Need for Testing
  - If Testing is Necessary – Check the Current SHS

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OPEN DISCUSSION AND QUESTIONS

(TIME PERMITTING)

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