



PHASE I ENVIRONMENTAL SITE ASSESSMENT - ADDENDUM I

I-24 SOUTHEAST CHOICE LANES

August 2025

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ISSUE AND REVISION RECORD

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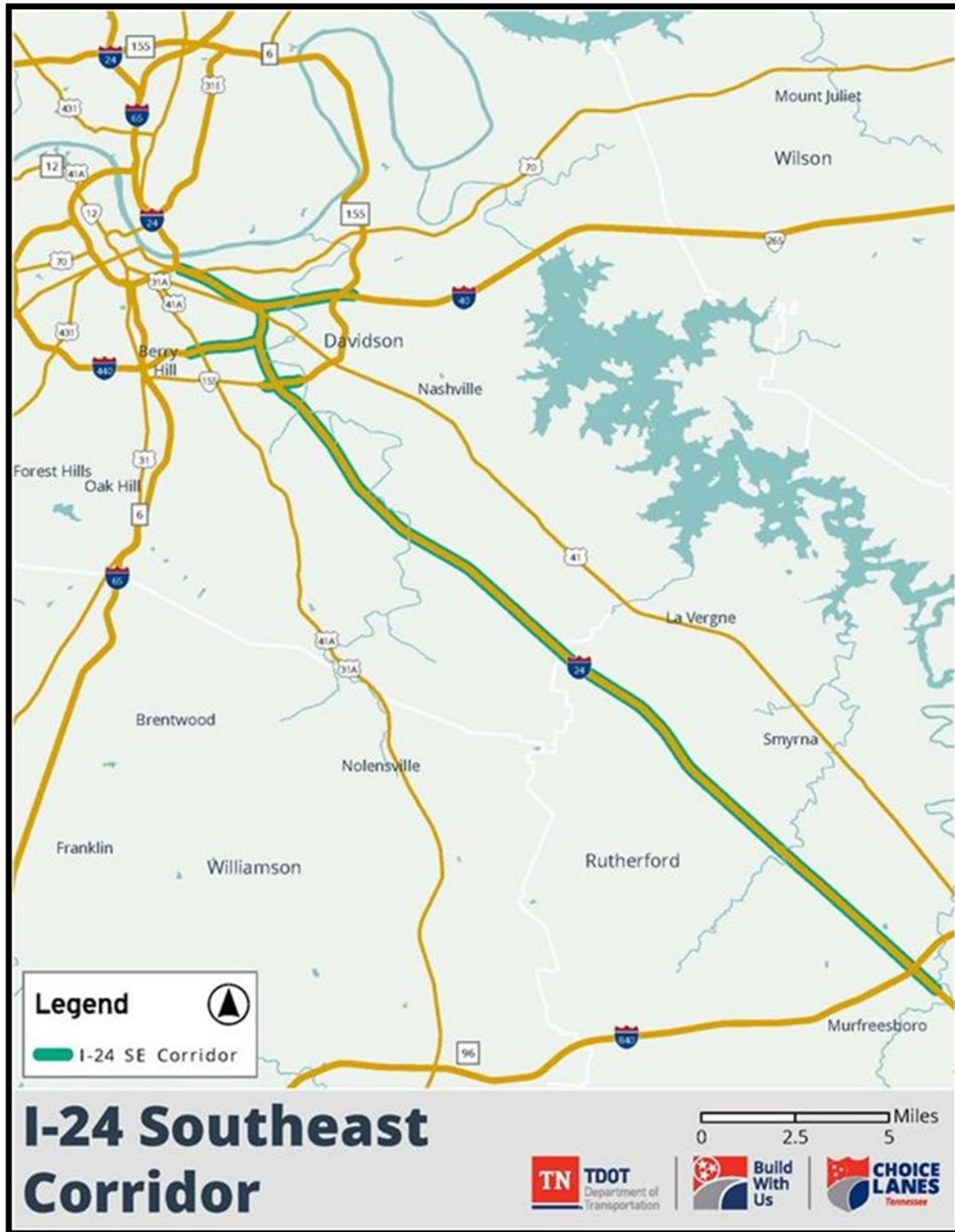
1. PROJECT OVERVIEW

The Tennessee Department of Transportation (TDOT), in coordination with the Federal Highway Administration (FHWA), is proposing to make improvements to I-24 between I-40 and I-840 in Davidson and Rutherford counties, Tennessee. The I-24 Southeast Choice Lanes project (proposed Project) would include widening the existing interstate to accommodate the addition of price-managed lanes (Choice Lanes) and interchange improvements.

The proposed Project is located along approximately 26 miles of I-24 between I-40 near downtown Nashville (Davidson County) and I-840 near Murfreesboro (Rutherford County) as depicted in **Figure 1-1**. The proposed Project would provide I-24 mainline improvements as well as improvements at the system-to-system interchanges at I-40 and I-440.

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Figure 1-1: Project Location Map



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2. PHASE I ESA

2.1. Executive Summary

A previous Phase I Environmental Site Assessment (ESA) was completed on the 26-mile roadway construction project in the Environmental Technical Study Area (ETSA) (“Subject Property”) for the TDOT Project Number PE-N: R3BVAR-S0-051, PIN: 134727.01, located along I-24 between I-40 near Downtown Nashville in Davidson County and I-840 near Murfreesboro in Rutherford County. This Phase I ESA was conducted in April 2024. The Subject Property assessed was the entire 26-mile Subject Property. However, along the interstate corridor, the Subject Property and the existing right-of-way (ROW) covered the same areas. The previous Phase I ESA focused on the interchanges identified below, where the Subject Property included commercial and industrial properties.

- Interchange 1: I-24/Almaville Road Interchange
- Interchange 2: I-24/Sam Ridley Parkway Interchange
- Interchange 3: I-24/Waldron Road Interchange
- Interchange 4: I-24/Old Hickory Boulevard Interchange
- Interchange 5: I-24/Century Farms Parkway Interchange
- Interchange 6: I-24/Bell Road Interchange
- Interchange 7: I-24/Haywood Lane Interchange
- Interchange 8: I-24/Harding Place Interchange
- Interchange 9: I-24/Thompson Lane – Briley Parkway Interchange
- Interchange 10: I-24/440 Parkway Interchange
- Interchange 11: I-24/US Highway 41 Interchange
- Interchange 12: I-24/I-40 Interchange

The subject property was expanded to include additional areas of right-of-way at the following interchanges. These interchanges were previously studied as part of the original Phase I ESA, but are being revisited to assess any areas that were not previously captured in the original Subject Property.

- Interchange 3: I-24/Waldron Road Interchange
- Interchange 6: I-24/Bell Road Interchange
- Interchange 10: I-24/440 Parkway Interchange
- Interchange 12: I-24/I-40 Interchange

Database Search Results

An environmental database search for the Subject Property was conducted by Environmental Risk Information Services, Inc. (ERIS). The findings of the ERIS report were

reviewed, and for the area within the search radii, the findings for each interchange can be found on their respective tables.

Based on the available information in records research, the understanding of the past and current operations, and the site reconnaissance, six high-risk sites have been identified within the Subject Property.

Interchange 3

At Interchange 3 Subject Property, no high-risk sites were identified. One low risk site was identified.

Interchange 6

At Interchange 6, four high-risk sites were identified. Three are active gas stations and one is an active oil change/automotive service center.

Interchange 10

At Interchange 10, one high-risk site was identified due to dumping activity at a residential lot. One low-risk site was identified at Interchange 10.

Interchange 12

At Interchange 12, one high-risk site was identified. One inactive gas station was identified within the Subject Property. 11 low risk sites were identified at Interchange 12.

2.2. Introduction

2.2.1. Purpose

This Phase I ESA Addendum 1 was completed for additional areas along the 26-mile roadway construction project in the ETSA (“Subject Property”). TDOT Project Number PE-N: R3BVAR-S0-051, PIN: 134727.01 refers to the section of I-24 between I-40 near Downtown Nashville in Davidson County and I-840 near Murfreesboro in Rutherford County to identify potential concerns that should be further considered as plans and project details are developed. This Phase I ESA was conducted in conformance with the standards set forth in the Tennessee Environmental Procedures Manual, Sec. 5.3.6.2.

This Phase I ESA was completed as due diligence for the Subject Property to identify potential areas of risk for the project during construction and to satisfy one of the innocent landowner defense requirements of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) through the identification of “high-risk” sites, which is the TDOT practice equivalent to a “Recognized Environmental Condition” (REC). Low-risk sites are those that have been researched and determined to have a de minimis hazardous waste concern.

The current ASTM International (ASTM) Standard Practice E1527-21 defines areas of past or current environmental concerns as RECs which are specifically described as:

"...the presence of hazardous substances or petroleum products in, on, or at the Subject Property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the Subject Property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the Subject Property under conditions that pose a material threat of a future release to the environment."

2.2.2. Scope of Work

The scope of work for this Phase I ESA was conducted in accordance with the standards set forth in the Tennessee Environmental Procedures Manual, Sec. 5.3.6.2, the All Appropriate Inquiries (AAI) provision in 40 CFR Part 312, and the apparent conditions, uses, and history of the Subject Property.

The following specific task items were addressed in the Scope of Work for this Phase I ESA:

- Determination of existing and past property uses according to the likelihood of hazardous waste contamination.
- Review of past aerial photographs to assist in identifying contaminating uses and contaminated sites/structures.
- Review of available subsurface and geological information and topographic maps.
- Review of reasonably ascertainable data from state and federal regulatory agencies and utility companies, file searches, and permit reviews. These include but are not limited to records of hazardous spills, Superfund listings, waste disposal sites, underground storage tanks, waste generators, wetlands, National Pollutant Discharge Elimination System (NPDES) permits, waste treatment facilities, and air emissions permits for the Subject Property and the adjacent properties within one-half mile of the Subject Property.
- Site reconnaissance of accessible portions of the property to observe or determine the presence of a REC from current or historical operations, abnormalities in vegetation, drainage from or onto adjacent land, wetlands, and building construction. If applicable, an evaluation is made on any use and storage of hazardous materials.

2.2.3. Significant Assumptions

Due to the limitations of data availability and reliability, no environmental assessment can wholly eliminate uncertainty regarding potential for significant environmental conditions in connection with a property. Performance of this Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property.

Regarding direction of groundwater flow, knowledge is based primarily on observed surface topography and topographic mapping. Unknowns such as bedrock strata and karst conditions that can affect groundwater flow direction are not predictable without additional investigation.

2.2.4. Special Terms and Conditions, Limitations, and Exceptions

The Phase I ESA did not include sampling of environmental media or investigation of subsurface conditions. Similarly, this Phase I ESA did not include specific evaluations to determine the presence of lead-based paint, asbestos-containing materials, wetlands, or radon.

Inquiries made during completion of this Phase I ESA have not been exhaustive, but they have been consistent with the standards set forth in the Tennessee Environmental Procedures Manual, Sec. 5.3.6.2, the AAI provision in 40 CFR Part 312, and the apparent conditions, uses, and history of the Subject Property.

Drawings and exhibits included in this report are for the purpose of assisting the reader in visualizing the Subject Property and data which may have been supplied in part by reliable third-party agencies. These drawings and exhibits are not intended to take the place of actual surveys, utility locations, utility capacities, or data otherwise needed for actual development and construction.

This Phase I ESA report is accepted to be valid for a period not to exceed 180 days. Beyond that period, the User of this report should consider the re-verification of the report data which is subject to change after the initial report preparation based on the type of property assessed and the condition of the areas surrounding the Subject Property.

2.2.5. Environmental Professional Statement

This Phase I ESA was completed by or under the direct supervision of the Environmental Professional identified on the signature page of this report (**Appendix A**). The Environmental Professional declares that, to the best of their professional knowledge and belief, they meet the definition of an Environmental Professional as defined in 40 CFR Part 312.

2.3. Subject Property Description

2.3.1. Location

The Subject Property is located along I-24 between I-40 near Downtown Nashville in Davidson County and I-840 near Murfreesboro in Rutherford County. Vicinity and site maps showing the boundary of the subject properties are provided in the attached Figures. Photographs of the Subject Property are included in **Appendix B**.

The Subject Property is identified as additional areas to the following previously identified Interchanges as described below.

- Interchange 3: I-24/Waldron Road Interchange
- Interchange 6: I-24/Bell Road Interchange
- Interchange 10: I-24/440 Parkway Interchange
- Interchange 12: I-24/I-40 Interchange

2.3.2. **Subject Property and Vicinity Characteristics**

The Subject Property is used for residential, agricultural, light industrial, green space, mixed-use, and commercial purposes. The northern end of the Subject Property is located in the more densely developed Nashville-area progressing through a more suburban setting moving south along the Subject Property.

2.3.3. **Current Use of the Subject Property**

The Subject Property contains primarily commercial properties such as buildings, parking lots, grassed areas, driveways, entrances, and utility pole and signage placements.

2.3.4. **Descriptions of Subject Property Structures and Improvements**

There are multiple structures located along the Subject Property as established in the ROW files. Historic aeriels show many of the structures dating back to at least the early 1950s which could indicate the potential for asbestos-containing materials and lead-based paint. The interiors of the structures were not inspected for ACM as part of this Phase I ESA.

2.3.5. **Current Use of Adjoining Properties**

Adjoining properties to the west and east of I-24 and its interchanges are used for agricultural, residential, light industrial, green space, mixed-use, and commercial purposes with driveways/access along the roadway.

2.4. **User Provided Information**

2.4.1. **User Questionnaire**

An Environmental Questionnaire was not completed by the potential buyer of the Subject Property as TDOT does not require their completion.

2.4.2. **Title Records**

A title record search was not performed for the Subject Property as TDOT will conduct title search prior to property acquisition.

2.4.3. Environmental Liens or Activity and Use Limitations

An environmental lien search was not performed for the Subject Property as TDOT will conduct environmental lien search prior to property acquisition.

2.4.4. Specialized, Commonly Known or Reasonably Ascertainable Knowledge

The User (TDOT, reliant parties) are familiar with the Subject Property and have obtained specialized, commonly known, or reasonably ascertainable knowledge. The reliant parties have been provided site data from the current owners in anticipation of a financial transaction.

2.4.5. Valuation Reduction for Environmental Issues

The User did not assess whether the purchase price of the Subject Property was comparable to the fair market value of the Subject Property.

2.4.6. Owner, Property Manager, and Occupant Information

The portions of the Subject Property located in the ROW acquisition area are considered a part of the Subject Property in this report.

2.4.7. Reasons for Performing Phase I

This Phase I ESA was performed as due diligence in preparation for acquiring the Subject Property and to satisfy one of the innocent landowner defense requirements of the CERCLA, for the Foreign Sovereign Immunities Act (FSIA), through the identification of RECs (high-risk sites) that may exist on the property, prior to property ownership transfer and/or other financial transaction.

The assessment for each of the four interchanges is presented below in Section 2.5 through Section 2.8. The project summary for all four interchanges is presented in Section 3. It includes the summary of all the areas of potential concern along the project Subject Property.

2.5. Interchange 3 - I-24/Waldron Road Interchange

2.5.1. Records Review

2.5.1.1 Standard Environmental Records Sources

Federal and State Database

Barge reviewed the ERIS Tennessee Environmental Procedures Manual-compliant environmental records/database reports. The database review took place on June 5, 2025, and is included in **Appendix C**.

The review provides federal and state regulatory agency information for Interchange 3 and adjacent properties within the search radii (0.25-mile radius and 0.5-mile radius from the Subject Property). The report indicated the following:

Involved Tracts of Subject Property

A summary table showing the number and type of database listings for Interchange 3 can be found on Table 1. A complete summary of all relevant findings and a ranking of potential to encounter hazardous materials for Interchange 3 can be found on Table 2.

Table 1 – Interchange 3 – ASTM Federal, State, and Tribal Database Lists

DATABASE	SUBJECT PROPERTY	SITES <1/4 MILE	SITES 1/4-1/2 MILE
Resource Conservation and Recovery Act (RCRA) Generators	0	5	N/A
Emergency Response Notification System (ERNS)	0	0	N/A
Leaking Underground Storage Tank (LUST)	0	13	6
LUST Trust	0	10	2
Underground Storage Tank (UST)	0	6	N/A
Voluntary Cleanup Program (VCP)	0	0	1
Facility Registry Service (FINDS)	0	N/A	N/A
State Remediation Program (SRP)	0	0	1
Spills	0	1	N/A
Formerly Used Defense Sites (FUDS)	1	0	0

Sites Located within 0.25 Miles of the Subject Property

Outside the Subject Property but within 0.25 miles of the Subject Property at Interchange 3, no listings were determined to have a significant environmental impact on the Subject Property.

Sites Located between 0.25 and 0.5 Miles of the Subject Property

Between 0.25 miles and 0.5 miles from the Subject Property at Interchange 3, no listings were determined to have a significant environmental impact on the Subject Property.

State Agency Inquiries

No additional records were obtained from any state agency for this portion of the Subject Property.

Additional Environmental Records Search

No additional environmental record sources were obtained for this portion of the Subject Property.

2.5.2. Physical Setting

2.5.2.1 Topography

The current USGS topographic 7.5-minute maps for Interchange 3 include the following: SMYRNA (2019) and LAVERGNE (2019).

Interchange 3 is located approximately 600 feet above sea level at 35.99433793, -86.59784587, with gently rolling topography and an average change in elevation of approximately 20 feet. Topographic maps are included in **Appendix E**.

2.5.2.2 Soils

Examination of the National Cooperative Soil Survey (NCSS) of Davidson and Rutherford Counties, Tennessee, issued by United States Department of Agriculture Soil Conservation Service (USDA SCS), indicates that the Subject Property is composed of several different soils including the Egam Silt Loam and Talbott-Barfield-Rock outcrop complex. Soils such as this typically have somewhat restricted water transmission through the soil. The Physical Settings Report is included in **Appendix F**.

2.5.2.3 Wetlands & Endangered Species

A wetland delineation and endangered species survey were not performed as part of the scope of this Phase I ESA.

2.5.2.4 Surface Water Bodies and Stormwater

A review of the United States Geologic Survey National Hydrology Dataset (USGS NHD) indicates multiple streams fall within the Subject Property.

2.5.2.5 Floodplains

According to the FEMA Flood Insurance Rate Maps for Davidson and Rutherford Counties, Maps 47149C0105H and 47037C0413J dated 2022, the Subject Property at Interchange 3 at

its southern half is located in “Zone X” and the northern half of the Subject Property is located in “Zone AE.” Zone X is defined as “areas determined to be outside the 0.2% annual flood chance floodplain.” Zone AE is defined as “1% Annual Chance of Flood Hazard.”

2.5.3. Historical Research

The following historical topographic maps were researched during preparation of this report and are presented in Appendix E:

- USGS 7.5-Minute Topographic Map – SMYRNA (1957)
- USGS 7.5-Minute Topographic Map – SMYRNA, LAVERGNE (1979) (1983) (1998) (2016) (2019)

Aerial photographs dated 1937, 1949, 1958, 1963, 1976, 1980, 1985, 1997, 2004, 2006, 2007, 2008, 2010, 2012, 2014, 2016, 2018, 2021, 2023 and 2024 are presented in **Appendix G**.

Historic Fire Insurance Maps were not available for this portion of the Subject Property.

2.5.3.1 Historical Use of Subject Property and Adjoining Properties

The Subject Property has existed as vacant land with the exception of the current road and billboard on-site. Based on aerial photograph, both appear to have been constructed around the early 1990s. The area around Interchange 3 appears to have first been commercially developed in the mid to late 1970s. I-24 appears to have been completed around that same time at Interchange 3.

2.5.4. Subject Property Reconnaissance

2.5.4.1 Methodology and Limiting Conditions

The site reconnaissance of the Subject Property at Interchange 3 was performed on June 18, 2025. The majority of the parcels were accessible at the time of inspection, and areas that were not physically accessible were observed and documented from the nearest accessible location. Field personnel traversed the length and width of the Subject Property in a vehicle, stopping at areas of interest for photographs and investigation on foot. Photographs of the Subject Property taken during the site reconnaissance are presented in **Appendix B**.

2.5.4.2 Hazardous Substances in Connection with Identified Uses

No evidence of hazardous substances was observed on the Subject Property at the time of site reconnaissance.

2.5.4.3 Unidentified Substance, Containers, Staining, or Stressed Vegetation

No unidentified substances, stressed vegetation, or staining were observed on this portion of the Subject Property at the time of site reconnaissance.

2.5.4.4 Known Spills or Releases

No known spills or releases were observed for this portion of the Subject Property.

2.5.4.5 Storage Tanks

No USTs were identified within this portion of the Subject Property.

2.5.4.6 Aboveground Storage Tank (ASTs)

There was no evidence of ASTs observed at this portion of the Subject Property at the time of site reconnaissance.

2.5.4.7 Lead-Based Paint (LBP)

A lead paint survey was not completed as part of the scope of this Phase I ESA. Structures built before 1978 have a greater potential of containing LBP.

2.5.4.8 Indications of Polychlorinated Biphenyls (PCBs)

A pad-mounted transformer was observed at the southern-most portion of the Subject Property at a City of La Vergne infrastructure site which includes a generator. The transformer appeared in good condition with no staining.

2.5.4.9 Asbestos-Containing Materials (ACMs)

An asbestos survey was not completed as part of the scope of this Phase I ESA and the presence or absence of ACMs in the structures in this portion of the Subject Property has not been determined. Structures built before 1975 have a greater potential of containing ACMs. There are multiple structures located within the Subject Property. However, based on the historic research, none of the structures were constructed before 1975.

2.5.4.10 Floor Drains/Sumps

No floor drains or sumps were observed at this portion of the Subject Property.

2.5.4.11 Indications of Solid Waste Disposal

No indication of improper solid waste disposal was observed at this portion of the Subject Property at the time of site reconnaissance.

2.5.4.12 Vapor Intrusion and Encroachment

The vapor migration pathways to the Subject Property would be via preferential flow pathways for vapors including utility lines, fractures in the soil, or along caves or conduits within the bedrock. Vapor pathways do not necessarily mirror groundwater flow pathways. Areas in close proximity to known releases could potentially encounter soil gas issues. Given

the current understanding of the future use of the Subject Property, vapor intrusion is not anticipated to be an issue at this time.

2.5.5. Interviews

2.5.5.1 Interviews with Owner

An interview was not completed with the current owners of the Subject Property as contact information was not provided.

2.5.5.2 Interviews with Local Government Officials

No interviews were conducted with local government officials based on the findings of the ERIS report, historical site information, and interviews.

2.5.5.3 Interviews with Neighboring or Nearby Property Owners or Occupants

No additional interviews with property owners were performed based on the findings of the ERIS report, historical site information, and interviews.

2.5.6. Interchange 3 - Findings and Conclusions

2.5.6.1 Findings

No underground storage tank (UST) facilities were found within the Subject Property. A summary of findings along with a potential to encounter hazardous materials ranking can be found on Table 2.

2.5.6.2 Data Failure

Data failure is “a failure to achieve the historical research objectives” of AAI, “even after reviewing the standard historical sources” listed in AAI “that are reasonably ascertainable and likely to be useful.” No data failures occurred for the Subject Property at Interchange 3.

2.5.6.3 Data Gaps

Data gaps are, “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 result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance and interviews.” No data gaps occurred for the Subject Property at Interchange 3.

2.5.6.4 Deviations

Deviations were made from the current ASTM Standard Practice E 1527-21 guidelines to adhere with the Tennessee Environmental Procedures Manual procedures. Such deviations include using hazard ranking and a focus on project impacts. In addition, an Environmental

Lien search was not conducted for this report and will be conducted by TDOT prior to Subject Property acquisition.

2.5.6.5 Conclusions

Based on the available information in the records research, the understanding of the past and current operations, and the site reconnaissance, this portion of the Subject Property contains no high-risk sites. One low-risk site was identified, as described below.

Table 2 – Interchange 3 portion of the Subject Property – Summary of Findings

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.1 MAP KEY	ADDRESS	CURRENT USE	ENVIRONMENTAL ISSUE
Low Risk	3.1	New Paul Road	Wooded Land/Storage Rental Business	This listing is for a National Pollutant Discharge Elimination System (NPDES) Permit relating to the construction activities for the adjacent storage business.

2.6. Interchange 6 - I-24/Bell Road Interchange

2.6.1. Records Review

2.6.1.1 Standard Environmental Records Sources

Federal and State Database

Barge reviewed the ERIS Tennessee Environmental Procedures Manual-compliant environmental records/database reports. The database review took place on June 5, 2025, and is included in **Appendix C**. Additional information on the USTs is in **Appendix D**– TDEC DUST Records.

The review provides federal and state regulatory agency information for Interchange 6 and adjacent properties within the search radii (0.25-mile radius and 0.5-mile radius from the Subject Property). The report indicated the following:

Involved Tracts of Subject Property

A summary showing the number and type of database listings for Interchange 6 can be found on Table 3. A summary of Tennessee UST Facilities database listings, including currently active and closed facilities, located at the Interchange 6 portion of the Subject Property is shown on Table 4. A complete summary of sites that pose a risk for the Interchange 6 portion of the Subject Property can be found on Table 5.

Table 3 – Interchange 6 – ASTM Federal, State, and Tribal Database Lists

DATABASE	SUBJECT PROPERTY	SITES <1/4 MILE	SITES 1/4-1/2 MILE
RCRA Generators	0	4	N/A
LUST	4	3	2
LUST Trust	1	0	1
UST	4	8	N/A
VCP	0	0	1
FINDS	5	N/A	N/A

Sites Located within 0.25 Miles of the Subject Property

Of the sites located outside the Subject Property but within 0.25 miles from the Interchange 6 portion of the Subject Property, none were determined to have a significant environmental impact on the Subject Property.

Sites located between 0.25 and 0.5 Miles of the Subject Property

Of the sites located between 0.25 miles and 0.5 miles from the Interchange 6 portion of the Subject Property, none were determined to have a significant environmental impact on the Subject Property.

State Agency Inquiries

Records were obtained from the TDEC Division of Underground Storage Tanks (DUST) regarding UST sites identified at the Interchange 6 portion of the Subject Property. No additional records were obtained from any other state agency for this report.

Additional Environmental Records Search

No other additional environmental record sources were obtained.

2.6.2. Physical Setting

2.6.2.1 Topography

The current USGS topographic 7.5-minute map for Interchange 6 is the following: ANTIOCH (2019).

The Interchange 6 portion of the Subject Property is located approximately 520 feet above sea level at 36.04520031, -86.65926375, with gently rolling topography and an average change in elevation of approximately 20 feet. Topographic maps are included in **Appendix E**.

2.6.2.2 Soils

Examination of the NCSS of Davidson and Rutherford Counties, Tennessee, issued by USDA SCS, indicates that the Subject Property is composed of several different soils including the Arrington Silt Loam. These soils are considered well drained. The Physical Settings Report is included in **Appendix F**.

2.6.2.3 Wetlands & Endangered Species

A wetland delineation and an endangered species survey were not included within the scope of this Phase I ESA.

2.6.2.4 Surface Water Bodies and Stormwater

A review of the USGS NHD indicates multiple streams are within the Subject Property.

2.6.2.5 Floodplains

According to the FEMA Flood Insurance Rate Maps for Davidson and Rutherford Counties, Map 47037C0391H dated 2017, the Interchange 6 portion of the Subject Property is predominantly located in “Zone X” defined as “areas determined to be outside the 0.2% annual flood chance floodplain.”

2.6.3. Historical Research

The following historical topographic maps were researched during preparation of this report and are presented in Appendix E:

- USGS 15-Minute Topographic Map – HERMITAGE (1932)
- USGS 7.5-Minute Topographic Map – ANTIOCH (1952) (1968) (1983) (1999) (2016) (2019)

Aerial photographs dated 1938, 1949, 1951, 1958, 1963, 1976, 1981, 1992, 1999, 2006, 2007, 2008, 2010, 2012, 2014, 2016, 2018, 2021, and 2023 are presented in **Appendix G**.

Historic Fire Insurance Maps were not available for the Interchange 6 portion of the Subject Property .

2.6.3.1 Historical Use of Subject and Adjoining Properties

The Interchange 6 portion of the Subject Property appears to have been developed for agricultural and residential purposes from the 1930s to 1950s. The area around Interchange 6 first appears to have been commercially developed in the late 1960s/early 1970s. I-24 appears to have been constructed in this area in the late 1950s/early 1960s. The Interchange 6 portion of the Subject Property appears to have first developed for commercial purposes in the late 1950s.

2.6.3.2 Adjacent and Surrounding Properties

Commercial Activity

Commercial activity along the Subject Property is heavily centered on I-24. This includes multiple gas stations, restaurants, warehouses, and hotels.

Undeveloped/Agricultural Lands and Residential Areas

The bulk of undeveloped/vacant land around the Subject Property at Interchange 6 consists of grassed medians.

Utility Services

Gas pipelines intersect I-24 near Interchange 6 trending north/south approximately one mile south of the current Subject Property.

2.6.4. Subject Property Reconnaissance

2.6.4.1 Methodology and Limiting Conditions

The reconnaissance of the Interchange 6 portion of the Subject Property was performed on June 18, 2025. The majority of the properties were accessible at the time of inspection, and sites that were not physically accessible were observed and documented from the closest possible location in the ROW. Field personnel traversed the length and width of the property in a vehicle, stopping at areas of interest for photographs and investigation on foot. Photographs of the Subject Property taken during the site reconnaissance are presented in **Appendix B**.

2.6.4.2 Hazardous Substances in Connection with Identified Uses

No evidence of hazardous substances was observed on the Interchange 6 portion of the Subject Property at the time of site reconnaissance.

2.6.4.3 Unidentified Substance, Containers, Staining, or Stressed Vegetation

No unidentified substances, stressed vegetation, or staining were observed on the Interchange 6 portion of the Subject Property at the time of site reconnaissance.

2.6.4.4 Known Spills or Releases

No known spills or releases were observed for the Interchange 6 portion of the Subject Property or its surrounding properties.

2.6.4.5 Storage Tanks

Underground Storage Tank (USTs)

Three properties within the Interchange 6 portion of the Subject Property were determined to contain active USTs. See Table 4 for a full list of details of the UST sites.

Table 4 – Interchange 6 portion of the Subject Property – Properties Containing USTs

ADDRESS		CURRENT OWNER	STATUS	NUMBER OF USTS	CURRENT USE
1110	Bell Road	TRI-STAR ENERGY LLC	Active	Four (Active)	Shell Gas Station
5272	Cane Ridge Road	KIMBRO FAMILY PROPERTIES, GP	Active	Four (Inactive) Five (Active)	Shell Gas Station
1101	Bell Road	MACSNEWCO, LLC	Active	Four (Removed) Four (Active)	Mapco Gas Station

Aboveground Storage Tank (ASTs)

There was no evidence of ASTs observed at the Interchange 6 portion of the Subject Property at the time of site reconnaissance.

2.6.4.6 Lead-Based Paint (LBP)

A lead paint survey was not completed as part of the scope of this Phase I ESA. Structures built before 1978 have a greater potential of containing LBP.

2.6.4.7 Indications of Polychlorinated Biphenyls (PCBs)

Two Pole-mounted transformers were observed along the roadway and within the Subject Property.

2.6.4.8 Asbestos-Containing Materials (ACMs)

An asbestos survey was not completed as part of the scope of this Phase I ESA and the presence or absence of ACMs in the buildings has not been determined. Structures built before 1975 have a greater potential of containing ACMs. There are multiple structures located within the Interchange 6 portion of the Subject Property. Based on the historic research, many of the structures existed before 1975 and therefore may contain ACM.

2.6.4.9 Floor Drains/Sumps

No floor drains or sumps were observed within the Subject Property.

2.6.4.10 Indications of Solid Waste Disposal

No indication of improper solid waste disposal was observed at the time of site reconnaissance.

2.6.4.11 Vapor Intrusion and Encroachment

The vapor migration pathways to the Subject Property would be via preferential flow pathways for vapors including utility lines, fractures in the soil, or along caves or conduits within the bedrock. Vapor pathways do not necessarily mirror groundwater flow pathways. Areas in close proximity to known releases could potentially encounter soil gas issues. If enclosed structures remain or are planned for the Interchange 6 portion of the Subject Property, vapor intrusion may be an issue.

2.6.5. Interviews

2.6.5.1 Interviews with Owner

An interview was not completed with the current owners of the Subject Property as contact information was not provided.

2.6.5.2 Interviews with Local Government Officials

No interviews were conducted with local government officials based on the findings of the ERIS report, historical site information, and interviews.

2.6.5.3 Interviews with Neighboring or Nearby Property Owners or Occupants

No additional interviews with property owners were performed based on the findings of the ERIS report, historical site information, and interviews.

2.6.6. Interchange 6 - Findings and Conclusions

2.6.6.1 Findings

A summary of the three Tennessee UST facilities for the Interchange 6 portion of the Subject Property can be found on Table 4. A summary of findings along with a potential to encounter hazardous materials ranking can be found on Table 5.

2.6.6.2 Data Failure

Data failure is “a failure to achieve the historical research objectives” of AAI, “even after reviewing the standard historical sources” listed in AAI “that are reasonably ascertainable and likely to be useful.” No data failures occurred for the Subject Property at Interchange 6.

2.6.6.3 Data Gaps

Data gaps are, “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 result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance and interviews.” No data gaps occurred for the Subject Property at Interchange 6.

2.6.6.4 Deviations

Deviations were made from the ASTM Standard Practice E 1527-21 guidelines to better meet the Tennessee Environmental Procedures Manual. Such deviations include using hazard ranking and a focus on project impacts. In addition, an Environmental Lien search was not conducted for this report and will be conducted by TDOT prior to Subject Property acquisition.

2.6.6.5 Conclusions

Based on the available information from the records research, the understanding of the past and current operations, and the site reconnaissance, the Subject Property has multiple active gas stations located at the Interchange 6 portion of the Subject Property. Each of the active gas stations has multiple in-use USTs containing both gasoline and diesel. Four high-risk sites were identified at the Interchange 6 portion of the Subject Property.

Table 5 – Interchange 6 portion of the Subject Property – Summary of Findings

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.2 MAP KEY	ADDRESS	FACILITY ID	CURRENT USE	ENVIRONMENTAL ISSUE
High	6.1	1110 Bell Road	5190077	Shell Gas Station	<p><u>Contains:</u> One 10,000-gallon gasoline UST One 6,000-gallon gasoline UST One 4,000-gallon diesel UST One 8,000-gallon diesel UST</p> <p>A portion of the tank pit is within the Interchange 6 portion of the Subject Property.</p>
High	6.2	5272 Cane Ridge Road	5190718	Shell Gas Station	<p><u>Contains:</u> One 10,000-gallon gasoline UST One 10,000-gallon diesel UST One 20,000-gallon gasoline UST One 4,000-gallon diesel UST One 2,000-gallon diesel UST</p> <p>Two Leaking Underground Storage Tank (LUST) incidents reported: 1998 and 1999. All are case closed.</p> <p>Entire gas station within Subject Property.</p>

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.2 MAP KEY	ADDRESS	FACILITY ID	CURRENT USE	ENVIRONMENTAL ISSUE
					<p><i>Note: Cemetery located within the Subject Property between ramp and gas station</i></p>
High	6.3	1101 Bell Road	5190965	Mapco Gas Station	<p><u>Contains:</u> One 8,000-gallon gasoline UST Two 20,000-gallon gasoline USTs One 12,000-gallon diesel UST Four 10,000-gallon gasoline/diesel USTs (removed in 2006)</p> <p>LUST incident reported in 2006 at tank closure. TDEC DUST issued case closed. Most of gas station, including tank pit and dispensers, are within the Interchange 6 portion of the Subject Property.</p>
High	6.4	1109 Bell Road	TND987777224	Valvoline Instant Oil Change	<p>Listed in FINDS & RCRA Very Small Quantity Generator (VSQG) databases relating to on-site automotive repair/maintenance. No violations listed in the EPA</p>

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.2 MAP KEY	ADDRESS	FACILITY ID	CURRENT USE	ENVIRONMENTAL ISSUE
					Enforcement and Compliance History Online (ECHO) data viewer.

2.7. Interchange 10 - I-24/440 Parkway Interchange

2.7.1. Records Review

2.7.1.1 Standard Environmental Records Sources

Federal and State Database

Barge reviewed the ERIS Tennessee Environmental Procedures Manual-compliant environmental records/database reports. The database review took place on June 5, 2025, and is included in **Appendix C**. Additional information on the USTs is in Appendix D- TDEC DUST Records.

The review provides federal and state regulatory agency information for Interchange 3 and adjacent properties within the search radii (0.25-mile radius and 0.5-mile radius from the Subject Property). The report indicated the following:

Involved Tracts of Subject Property

A summary table showing the number and type of database listings for the Interchange 10 portion of the Subject Property can be found on Table 6. There were no UST Facilities identified at the Interchange 10 portion of the Subject Property, including both currently active and closed facilities. A complete summary of all relevant findings, and a ranking of potential to encounter hazardous materials for the Subject Property at Interchange 10 can be found on Table 8.

Table 6 – Interchange 10 portion of the Subject Property – ASTM Federal, State, and Tribal Database Lists

DATABASE	SUBJECT PROPERTY	SITES <1/4 MILE	SITES 1/4-1/2 MILE
CERCLIS (Comprehensive Environmental Response, Compensation, and Liability Information System)	0	1	0
RCRA Corrective Actions (CORRACTS)	0	0	2
Institutional/Engineering Controls	0	0	1
LUST	0	5	5
LUST Trust	0	3	1
UST	0	5	-
VCP	0	0	3
SRP	0	0	2
Hazardous Waste Management (HWM)	0	1	2
RCRA Generators	0	2	-

Sites Located within 0.25 Miles of the Subject Property

Of the sites located outside the Subject Property and within 0.25 of the Interchange 10 portion of the Subject Property, none were determined to have a significant environmental impact on the Subject Property.

Sites Located between 0.25 and 0.5 Miles of the Subject Property

Of the sites located between 0.25 miles and 0.5 miles from the Interchange 10 portion of the Subject Property, none were determined to have a significant environmental impact on the Subject Property.

State Agency Inquiries

No additional records were obtained from any state agency for this report.

Additional Environmental Records Search

No specific additional environmental record sources were obtained.

2.7.2. Physical Setting

2.7.2.1 Topography

The current USGS topographic 7.5-minute maps for the Interchange 10 portion of the Subject Property are the following: ANTIOCH (2019) and NASHVILLE EAST (2019).

The Interchange 10 portion of the Subject Property is located approximately 530 feet above sea level at 36.12552574, -86.72886905, with gently rolling topography with an average change in elevation of approximately 20 feet. Topographic maps are included in **Appendix E**.

2.7.2.2 Soils

Examination of the NCSS of Davidson and Rutherford Counties, Tennessee, issued by USDA SCS, indicates that the Subject Property is entirely underlain by the Stiversville-Urban land complex. Soils such as this typically are well drained. The Physical Settings Report is included in **Appendix F**.

2.7.2.3 Wetlands & Endangered Species

A wetland delineation and an endangered species survey were not included within the scope of this Phase I ESA.

2.7.2.4 Surface Water Bodies and Stormwater

A review of the USGS NHD indicates no streams are mapped within the Interchange 10 portion of the Subject Property.

2.7.2.5 Floodplains

According to the FEMA Flood Insurance Rate Maps for Davidson and Rutherford County, Maps 47037C0263H and 47037C0376H dated 2017, the Subject Property is located in “Zone X” defined as “areas determined to be outside the 0.2% annual flood chance floodplain.”

2.7.3. Historical Research

The following historical topographic maps were researched during preparation of this report and are presented in Appendix E:

- USGS 15-Minute Topographic Map – HERMITAGE (1932)
- USGS 7.5-Minute Topographic Map – EAST NASHVILLE, ANTIOCH (1952) (1957) (1968) (1983) (1997) (1999) (2016) (2019)

Aerial photographs dated 1938, 1949, 1951, 1959, 1963, 1969, 1976, 1981, 1992, 1997, 2006, 2007, 2008, 2010, 2012, 2014, 2016, 2018, 2021, 2023, and 2024 are presented in **Appendix G**.

Historic Fire Insurance Maps were not available for this Subject Property portion of the Subject Property but were available for the west adjacent properties. These adjacent Fire Insurance Maps are dated 1951 and 1957.

2.7.3.1 Historical Use of Subject and Adjoining Properties

The railroad and Glenrose Avenue which intersect the Subject Property have existed since at least the 1930s. Residential development of the Subject Property began in the 1950s. The area around Interchange 10 appears to have first been commercially developed in the mid to late 1970s. I-24 appears to have been constructed in the late 1960s.

2.7.3.2 Adjacent and Surrounding Properties

Commercial Activity

There is very little commercial activity near the Subject Property at Interchange 10 as the area is primarily residential.

Undeveloped/Agricultural Lands and Residential Areas

While the bulk of commercial activity is focused around the interchanges, residential and agricultural areas are predominant along the rest of the I-24 Subject Property.

2.7.4. Subject Property Reconnaissance

2.7.4.1 Methodology and Limiting Conditions

The reconnaissance of the Interchange 10 portion of the Subject Property was performed on June 19, 2025. The majority of the parcels were accessible at the time of inspection, and sites that were not physically accessible were observed from the closest possible location within the ROW. Field personnel traversed the length and width of the property in a vehicle, stopping at areas of interest for photographs and investigation on foot. Photographs of the Subject Property taken during the site reconnaissance are presented in **Appendix B**.

2.7.4.2 Hazardous Substances in Connection with Identified Uses

No evidence of hazardous substances was observed on the Interchange 10 portion of the Subject Property at the time of site reconnaissance.

2.7.4.3 Unidentified Substance, Containers, Staining, or Stressed Vegetation

No unidentified substances, stressed vegetation, or staining were observed on the Interchange 10 portion of the Subject Property at the time of site reconnaissance.

2.7.4.4 Known Spills or Releases

No known spills or releases are reported for the Subject Property or its surrounding properties.

2.7.4.5 Storage Tanks

Underground Storage Tank (USTs)

There was no evidence of USTs observed at the Interchange 10 portion of the Subject Property at the time of site reconnaissance.

Aboveground Storage Tank (ASTs)

There was no evidence of ASTs observed at the Interchange 10 portion of the Subject Property at the time of site reconnaissance.

2.7.4.6 Lead-Based Paint (LBP)

A lead paint survey was not completed as part of the scope of this Phase I ESA. Structures built before 1978 have a greater potential of containing LBP.

2.7.4.7 Indications of Polychlorinated Biphenyls (PCBs)

Three pole-mounted transformers were observed along Elm Hill Pike and within the Subject Property.

2.7.4.8 Asbestos-Containing Materials (ACMs)

An asbestos survey was not completed as part of the scope of this Phase I ESA and the presence or absence of ACMs in the buildings has not been determined. Structures built before 1975 have a greater potential of containing ACMs. There are multiple structures located within the Interchange 10 portion of the Subject Property. Based on the historic research, many of the structures existed before 1975 and therefore have the potential to contain ACM.

2.7.4.9 Floor Drains/Sumps

No floor drains or sumps were observed within the structures of the Interchange 10 portion of the Subject Property.

2.7.4.10 Indications of Solid Waste Disposal

An area of dumping/improper waste disposal was observed on the ground on the southern side of the Interchange 10 portion of the Subject Property, south of 440 Parkway and west of Lyle Court. The material appeared to be mostly construction and demolition debris, such as wood and metal; however, two unlabeled plastic 55-gallon drums as well as smaller

containers of liquid were noted among the debris. The drums and other waste were near the boundary of the Interchange 10 portion of the Subject Property.

2.7.4.11 Vapor Intrusion and Encroachment

The vapor migration pathways to the Subject Property would be via preferential flow pathways for vapors including utility lines, fractures in the soil, or along caves or conduits within the bedrock. Vapor pathways do not necessarily mirror groundwater flow pathways. Areas in close proximity to known releases could potentially encounter soil gas issues. Given the current understanding of the future use of the Subject Property, vapor intrusion is not anticipated to be an issue at this time.

2.7.5. Interviews

2.7.5.1 Interviews with Owner

An interview was not completed with the current owners of the Subject Property as contact information was not provided.

2.7.5.2 Interviews with Local Government Officials

No interviews were conducted with local government officials based on the findings of the ERIS report, historical site information, and interviews.

2.7.5.3 Interviews with Neighboring or Nearby Property Owners or Occupants

No additional interviews with property owners were performed based on the findings of the ERIS report, historical site information, and interviews.

2.7.6. Interchange 10 - Findings and Conclusions

2.7.6.1 Findings

No evidence of USTs were observed at this location. A summary of findings along with a potential to encounter hazardous materials ranking can be found on Table 7.

2.7.6.2 Data Failure

Data failure is “a failure to achieve the historical research objectives” of AAI, “even after reviewing the standard historical sources” listed in AAI “that are reasonably ascertainable and likely to be useful.” No data failures occurred for the Subject Property at Interchange 10.

2.7.6.3 Data Gaps

Data gaps are, “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 result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance and interviews.” No data gaps occurred for the Subject Property at Interchange 10.

2.7.6.4 Deviations

Deviations were made from the current ASTM Standard Practice E 1527-21 guidelines to adhere with the Tennessee Environmental Procedures Manual procedures. Such deviations include using hazard ranking and a focus on project impacts. In addition, an Environmental Lien search was not conducted for this report and will be conducted by TDOT prior to Subject Property acquisition.

2.7.6.5 Conclusions

Based on the available information in records research, the understanding of the past and current operations, and the site reconnaissance, the Interchange 10 portion of the Subject Property has one high-risk site identified.

Table 7 – Interchange 10 portion of the Subject Property – Summary of Findings

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.3 MAP KEY	ADDRESS	CURRENT USE	ENVIRONMENTAL ISSUE
Low	10.1	36.124248°, - 86.737619°	Railroad	Active rail lines may have spills and releases over the years which may impact the soil.
High	10.2	2113 Lyle Court	Residential lot	Dumping observed during site visit. Stacks of materials over 8 feet high in some sections. Two unlabeled 55-gallon drums of liquid observed during site visit.

2.8. Interchange 12 - I-24/I-40 Interchange

2.8.1. Records Review

2.8.1.1 Standard Environmental Records Sources

Federal and State Database

ERIS completed a Tennessee Environmental Procedures Manual-compliant environmental records/database review. The database review took place on June 4, 2025, and is included in **Appendix C**. Additional information on the USTs is in Appendix D – TDEC DUST Records.

The ERIS review provides federal and state regulatory agency information for the Interchange 12 portion of the Subject Property and properties within the search radii (0.25-mile radius and 0.5-mile radius from the Subject Property). The report indicated the following:

Involved Tracts of Subject Property

A summary table showing the number and type of database listings for the Subject Property at Interchange 12 can be found on Table 8. A summary of the Tennessee UST Facilities at the

Interchange 12 portion of the Subject Property, including both currently active and closed facilities, can be found on Table 9. A complete summary of all relevant findings and a ranking of potential to encounter hazardous materials for the Interchange 12 portion of the Subject Property can be found on Table 10.

Table 8- Interchange 12 portion of the Subject Property – ASTM Federal, State, and Tribal Database Lists

DATABASE	SUBJECT PROPERTY	SITES <1/4 MILE	SITES 1/4-1/2 MILE
CERCLIS	0	1	1
RCRA Generators	0	9	-
Institutional/Engineering Controls	0	3	-
ERNS	2	0	0
Landfill/Solid Waste Facility (SWF)	0	0	3
LUST	2	23	9
LUST Trust	2	10	6
UST	1	22	2
VCP	0	2	8
FINDS	8	2	-
SRP	0	1	3
Spills	1	1	0
HWM	3	13	-

Sites Located within 0.25 Miles of the Subject Property

Of the sites located outside the Subject Property but within 0.25 miles of the Interchange 12 portion of the Subject Property, none were determined to have a significant environmental impact on the Subject Property.

Sites Located between 0.25 and 0.5 Miles of the Subject Property

Of the sites located between 0.25 miles and 0.5 miles from the Interchange 12 portion of the Subject Property, none were determined to have a significant environmental impact on the Subject Property.

State Agency Inquiries

Records were obtained from the TDEC DUST regarding UST sites along the Subject Property. Records were obtained from TDEC Division of Solid Waste Management (DSWM) regarding Hazardous Waste Management (HWM) sites at the Interchange 12 portion of the Subject Property. No additional records were obtained from any other state agency for this report.

Additional Environmental Records Search

No other specific additional environmental record sources were obtained.

2.8.2. Physical Setting

2.8.2.1 Topography

The current USGS topographic 7.5-minute map for Interchange 12 is the following: NASHVILLE EAST (2019).

Interchange 12 is located approximately 530 feet above sea level at 36.14072307, -86.72738709, with gently rolling topography and an average change in elevation of approximately 40 feet. Topographic maps are included in **Appendix E**.

2.8.2.2 Soils

Examination of the NCSS of Davidson and Rutherford Counties, Tennessee, issued by USDA SCS, indicates that the Subject Property is composed of several different soils including the Stiversville-Urban land complex. These soils are typically well drained. The Physical Settings Report is included in **Appendix F**.

2.8.2.3 Wetlands & Endangered Species

A wetland delineation and an endangered species survey was not included within the scope of this Phase I ESA.

2.8.2.4 Surface Water Bodies and Stormwater

A review of the USGS NHD indicates no streams are within the Interchange 12 portion of the Subject Property.

2.8.2.5 Floodplains

According to the FEMA Flood Insurance Rate Maps for Davidson and Rutherford Counties, Maps 47037C0263H and 47037C0264H dated 2017, the Interchange 12 portion of the Subject Property is predominantly located in “Zone X” defined as “areas determined to be outside the 0.2% annual flood chance floodplain.”

2.8.3. Historical Research

The following historical topographic maps were researched during preparation of this report and are presented in **Appendix E**:

- USGS 15-Minute Topographic Map – HERMITAGE (1932)
- USGS 7.5-Minute Topographic Map – NASHVILLE EAST (1952) (1957) (1968) (1983) (1997) (2016) (2019)

Aerial photographs dated 1938, 1949, 1951, 1959, 1963, 1968, 1976, 1981, 1992, 1997, 2006, 2007, 2008, 2010, 2012, 2014, 2016, 2018, 2021, and 2023 are presented in **Appendix G**.

Historic Fire Insurance Maps dated 1957 are presented in **Appendix H**.

2.8.3.1 Historical Use of Subject and Adjoining Properties

Interchange 12 first appears to have been commercially developed in the late 1950s. I-24 appears to have been constructed by the mid-1970s.

2.8.3.2 Adjacent and Surrounding Properties

Commercial Activity

Commercial activity in this area is primarily related to used car sales, warehousing, and automotive parts warehousing.

Undeveloped/Agricultural Lands and Residential Areas

Vacant land around the Subject Property is primarily grassed median/shoulder area.

2.8.4. Subject Property Reconnaissance

2.8.4.1 Methodology and Limiting Conditions

The reconnaissance of the Interchange 12 portion of the Subject Property was performed on June 19, 2025. The majority of the parcels were accessible at the time of inspection, and sites that were not physically accessible were observed from the closest possible location on the ROW. Field personnel traversed the length and width of the property in a vehicle, stopping at areas of interest for photographs and investigation on foot. Photographs of the Subject Property taken during the site reconnaissance are presented in **Appendix B**.

2.8.4.2 Hazardous Substances in Connection with Identified Uses

No evidence of hazardous substances was observed on the Interchange 12 portion of the Subject Property at the time of site reconnaissance.

2.8.4.3 Unidentified Substance, Containers, Staining, or Stressed Vegetation

No unidentified substances, stressed vegetation, or staining were observed on the Interchange 12 portion of the Subject Property at the time of site reconnaissance.

2.8.4.4 Known Spills or Releases

No spills/releases were observed at the Subject Property.

2.8.4.5 Storage Tanks

Underground Storage Tank (USTs)

One property within the Interchange 12 portion of the Subject Property was determined to contain active USTs. See Table 10 for a full list of details of each UST site.

Table 9– Interchange 12 portion of the Subject Property – Properties Containing USTs

ADDRESS	CURRENT OWNERS	STATUS	NUMBER OF USTs	CURRENT USE
520 Fesslers Lane	Luis Alva	Inactive	Five (Removed)	Auto Sales

Aboveground Storage Tank (ASTs)

There was no evidence of ASTs observed on the Subject Property at the time of site reconnaissance.

2.8.4.6 Lead-Based Paint (LBP)

A lead paint survey was not completed as part of the scope of this Phase I ESA. Structures built before 1978 have a greater potential of containing LBP.

2.8.4.7 Indications of Polychlorinated Biphenyls (PCBs)

No transformers were observed at the Subject Property during the site visit.

2.8.4.8 Asbestos-Containing Materials (ACMs)

An asbestos survey was not completed as part of the scope of this ESA and the presence or absence of ACMs in the buildings has not been determined. Structures built before 1975 have a greater potential of containing ACMs. There are multiple structures located within the Interchange 12 portion of the Subject Property. Based on the historic research, many of the structures existed before 1975 and therefore have the potential to contain ACM.

2.8.4.9 Floor Drains/Sumps

No floor drains or sumps were observed within the Subject Property.

2.8.4.10 Indications of Solid Waste Disposal

No indication of improper solid waste disposal was observed at the Interchange 12 portion of the Subject Property at the time of site reconnaissance.

2.8.4.11 Vapor Intrusion and Encroachment

The vapor migration pathways to the Subject Property would be via preferential flow pathways for vapors including utility lines, fractures in the soil, or along caves or conduits within the bedrock. Vapor pathways do not necessarily mirror groundwater flow pathways. Areas in close proximity to known releases could potentially encounter soil gas issues. If enclosed structures remain or are planned for the Interchange 12 portion of the Subject Property, vapor intrusion may be an issue.

2.8.5. Interviews

2.8.5.1 Interviews with Owner

An interview was not completed with the current owners of the Subject Property as contact information was not provided.

2.8.5.2 Interviews with Local Government Officials

No interviews were conducted with local government officials based on the findings of the ERIS report, historical site information, and interviews.

2.8.5.3 Interviews with Neighboring or Nearby Property Owners or Occupants

No additional interviews with property owners were performed based on the findings of the ERIS report, historical site information, and interviews.

2.8.6. Interchange 12 - Findings and Conclusions

2.8.6.1 Findings

A summary of the Tennessee UST Facilities at the Interchange 12 portion of the Subject Property can be found on Table 10. A summary of findings along with a potential to encounter hazardous materials ranking can be found on Table 10.

2.8.6.2 Data Failure

Data failure is “a failure to achieve the historical research objectives” of AAI, “even after reviewing the standard historical sources” listed in AAI “that are reasonably ascertainable and likely to be useful.” No data failures occurred for the Subject Property at Interchange 12.

2.8.6.3 Data Gaps

Data gaps are, “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 result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance and interviews.” No data gaps occurred for the Subject Property at Interchange 12.

2.8.6.4 Deviations

Deviations were made from the current ASTM Standard Practice E 1527-21 guidelines to adhere with the Tennessee Environmental Procedures Manual procedures. Such deviations include using hazard ranking and a focus on project impacts. In addition, an Environmental Lien search was not conducted for this report and will be conducted by TDOT prior to Subject Property acquisition.

2.8.6.5 Conclusions

Based on the available information in records research, the understanding of the past and current operations, and the site reconnaissance, the Interchange 12 portion of the Subject Property contains a former gas station. One high risk site was identified within the Interchange 12 portion of the Subject Property.

Table 10- Interchange 12 portion of the Subject Property – Summary of Findings

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.4 MAP KEY	ADDRESS	FACILITY ID	CURRENT USE	ENVIRONMENTAL ISSUE
High	12.1	520 Fessler Lane	5190994	Auto Sales	<p><u>Contains:</u> Five USTs were removed from the ground in 2003. Two LUST incidents for the facility (2000 and 2002) which have both received case closed status from TDEC.</p> <p>The canopy of the former gas station is still in place but</p>

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.4 MAP KEY	ADDRESS	FACILITY ID	CURRENT USE	ENVIRONMENTAL ISSUE
					no dispensers are left in place.
Low	12.2	883 Elm Hill Pike		Automotive Parts Supplier	Listed in the following databases: FINDS, ICIS, AFS All listings related to air permits for the facility. No violations found.
Low	12.3	884 Elm Hill Pike		"Forklift Business"	Listed in the SWM Complaints database based on a complaint regarding spilled oil in 2020. No issue was found associated with this complaint.
Low	12.4	888 Elm Hill Pike		Envelope Manufacturer	Listed in the following databases: FINDS, ICIS, AFS. All listings related to air permits for the facility. No violations found.
Low	12.5	895 Elm Hill Pike		Logistics Company	Listed in the ERNS database for a release of approximately 35-gallons of used motor oil in 2019. Cleanup has been completed for the spill.

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.4 MAP KEY	ADDRESS	FACILITY ID	CURRENT USE	ENVIRONMENTAL ISSUE
Low	12.6	911 Elm Hill Pike		Body Shop	Listed in the following databases: FINDS, RCRA NonGen, & HWM. No violations or enforcement actions within the last 10 years.
Low	12.8	1018 Elm Hill Pike		Heating and Air	Listed in the FINDS database due to an NPDES Construction Permit.
Low	12.9	1006 Elm Hill Pike		Church Publishing	Listed in the following databases: FINDS & RCRA Non-Gen. There are no violations or enforcement actions listed for the facility.
Low	12.10	1405 Elm Hill Pike		Automotive Parts	Listed in the FINDS and RCRA Non-Gen databases. RCRA Non-Gen compliance inspections found no violations and verified non-generator status.
Low	12.11	1080 Elm Hill Pike		Automotive Parts	Listed in the following databases: FINDS,

RISK OF ENCOUNTERING POTENTIAL HAZARDOUS MATERIALS	FIG 2.4 MAP KEY	ADDRESS	FACILITY ID	CURRENT USE	ENVIRONMENTAL ISSUE
					<p>RCRA Non-Gen, ICIS, HWM, & AFS.</p> <p>One of the FINDS listings mentions the sale of Asbestos Products. The EPA Facility Detail Report lists the last updated year as 2014 and shows the business as permanently closed.</p>
Low	12.12	1100 Elm Hill Pike		Regency Lighting Industries	Listed in the following databases: RCRA Non-Gen, & FINDS. There are no violations or enforcement actions listed for the facility.

3. CORRIDOR FINDINGS

3.1. Findings

A summary of all the Tennessee UST Facilities across the Subject Property can be found in their respective Sections within this report. A summary of findings along with a potential to encounter hazardous materials ranking can be found on at the end of each Section within this report.

3.2. Data Failure

Data failure is “a failure to achieve the historical research objectives” of AAI, “even after reviewing the standard historical sources” listed in AAI “that are reasonably ascertainable and likely to be useful.” No data failures occurred for the Subject Property.

3.3. Data Gaps

Data gaps are, “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 result from incompleteness in any of the activities required by this practice, including, but not limited to site reconnaissance and interviews.” No data gaps occurred for the Subject Property.

3.4. Deviations

Deviations were made from the current ASTM Standard Practice E 1527-21 guidelines to adhere with the Tennessee Environmental Procedures Manual procedures. Such deviations include using hazard ranking and a focus on project impacts. In addition, an Environmental Lien search was not conducted for this report and will be conducted by TDOT prior to Subject Property acquisition.

3.5. Conclusions

This Phase I ESA was performed in conformance with the scope and limitations of the Tennessee Environmental Procedures Manual, Sec. 5.3.6.2, of the Subject Property addendum Interchanges located along the 26-mile roadway construction project in the Subject Property for the Project Number PE-N: R3BVAR-S0-051, PIN: 134727.01 along I-24 between I-40 near Downtown Nashville in Davidson County and I-840 near Murfreesboro in Rutherford County. Any exceptions to, or deletions from, this practice are described in Section 2.8.6 of this report.



Based on the available information in records research, the understanding of the past and current operations, and the site reconnaissance, six high-risk sites were identified within the Subject Property.



APPENDIX A. ENVIRONMENTAL PROFESSIONAL SIGNATURE PAGE

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APPENDIX B. PHOTO LOG

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APPENDIX C. ERIS DATABASE REPORTS

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APPENDIX D. TDEC UST RECORDS

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APPENDIX E. HISTORIC TOPOGRAPHIC MAPS

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APPENDIX F. PHYSICAL SETTING REPORT

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APPENDIX G. HISTORIC AERIAL PHOTOS

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APPENDIX H. FIRE INSURANCE MAPS

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