Executive Summary

UES conducted a Site Assessment of portions of the Silo Mills development to determine whether the property had been affected by historical landfarm operations. All of the evidence and scientific data collected and evaluated as part of the Site Assessment demonstrates that the constituents of concern identified are below applicable regulatory levels established by the RRC and the TCEQ and/or indicative of naturally occurring background conditions. UES has concluded that the subject property is suitable for residential land-use development and occupancy and the operation of an elementary school based on no identified adverse impacts to human health or the environment. Based on our findings, no further testing is warranted.

Specifically, 100% of soil analytical results are below regulatory action levels for the primary human health direct exposure pathways: skin contact, ingestion, and inhalation of soil particles. Data collected by UES from 1,996 sample nodes were evaluated across the 268-acre study area. A summary of these sample nodes is provided in the table below and illustrated in Figure 2.

Summary of Sample Nodes Evaluated

Sample Node Type	Quantity	Description
Soil Borings	48	Continuous cores mechanically advanced into soil to depths up to 15 feet below ground surface (bgs) or refusal ranging from 6 feet to 12 feet bgs.
Temporary Monitoring Well	1	Installed to 40 feet bgs, no groundwater identified
Hand Auger Borings	15	Continuous cores manually advanced in shallow soil to depths up to 5 feet bgs
Field Screening of Soil Samples-Radioactivity	900	Soil screened for alpha, beta, gamma, and x-ray radiation every 1 foot bgs in 48 soil borings and at the ground surface at 297 locations as part of the Preliminary Soil Screening Survey performed February 21, 2026
Field Screening of Soil Samples–Volatile Organic Vapors	603	Soil screened every 1 foot bgs in soil borings using a photo-ionization detector (PID)
Laboratory Soil Samples – one or more of the RCRA 8 Metals	137	Soil samples collected and submitted for laboratory analysis using EPA Method 6010/7471.
Laboratory Soil Samples – Selenium SPLP	1	Soil samples collected and submitted for laboratory analysis of Selenium using the Synthetic Precipitation Leaching Procedure (SPLP) EPA Method 1312
Laboratory Soil Samples – BTEX or benzene only	98	Soil samples collected and submitted for laboratory analysis using EPA Method 8260

Laboratory Soil Samples - TPH	96	Soil samples collected and submitted for laboratory analysis using Texas Method 1005
Laboratory Soil Samples – TPH by 1006	1	Soil Sample collected and submitted for laboratory analysis using Texas Method 1006
Laboratory Soil Samples - Chloride	96	Soil samples collected and submitted for laboratory analysis using EPA Method 9056
Total Sample Nodes	**1,996**	

The soils encountered at the site consisted of a firm, brown clay to approximately 10 feet to 15 feet bgs, grading into a gray, hard shale from 15 feet to 25 feet bgs, underlain by a tan, weathered shale from 25 feet to 35 feet bgs, on top of a hard, gray limestone. The drill rig encountered refusal at depths ranging from 6 feet to 12 feet bgs in the 48 soil borings advanced to 15 feet and at 40 feet bgs in the boring advanced for the temporary monitoring well installation.

Various metals were detected in soil at or below naturally occurring background concentrations. Therefore, the potential for metals in soil at or below background conditions to threaten human health is low and consistent with the same risk had the historical landfarm never operated on site.

Groundwater was not encountered in any of the borings, which supports our assumption that the soil leaching-to-groundwater exposure pathway can be ruled out for further consideration at this site. Shallow groundwater beneath the site is either not present, occurs only intermittently, or does not produce sufficient water to be a usable resource.

Potable water for the Silo Mills Development is supplied by the Johnson County Special Utility District (JCSUD). JCSUD's current water supply consists of surface water from the City of Mansfield; surface water from the Brazos Regional Public Utility Agency; and groundwater from 11 well sites all located off site of the Silo Mills Development. This water supply is regulated by the EPA and TCEQ and provides clean usable drinking water to all of Silo Mills residents and to all students and staff of Pleasant View Elementary School.

Silo Mills irrigation water supply is derived from groundwater obtained from a permitted water supply well accessing an aquifer more than 1,200 feet bgs and separated from the surface soil by approximately 900 feet of hard clay and limestone. The water supply well is located north of the study area where no landfarm cells were operated (Figure 3).

To supplement the previous surface radiation survey with data from soils at depth (see Appendix A: *Preliminary Radioactivity in Soil Screening Survey – February 27, 2026*), UES field-screened 100% of collected soil cores using the Radiation Alert Ranger EXP. The subsurface radiation

survey results indicated measurements consistent with the surface radiation data. There is no evidence of radioactivity at the site above naturally occurring background conditions. Furthermore, there is no evidence that would suggest that radioactive materials were historically placed or used on site nor incorporated into the existing soil. The average readings across the site were reported at values less than what can be registered off of granite counter tops.

Starting March 12, 2026, UES conducted a file review of the RRC records for the permitted landfarm and compiled all of the site closure data from the various closure reports as part of an independent evaluation of the permit closure data. A summary of the evaluation was provided in a letter report dated March 19, 2026. UES independently evaluated the site closure data and confirmed compliance with the RRC regulations. A copy of the letter report is included as Appendix B.

The current site conditions and concentrations of constituents confirm the previous conclusion of the RRC that the historical landfarm was operated in compliance with the RRC permit, and applicable RRC regulations, as indicated by the RRC granting closure of the permit and the facility.