

January 23, 2026

Ms. Janet Anderson
REC FS, LLC
230 S. Sporting Hill Road, Suite 100
Mechanicsburg, PA 17050

RE: Summary of Recent Environmental Investigations
The Frog, Switch & Manufacturing Company
600 E. High Street
Carlisle, Pennsylvania
BL Project No. 2500400

Dear Ms. Anderson:

BL Companies (BL) has prepared this letter report to summarize the detailed information provided in the December 2025 *Interim Phase II Environmental Site Assessment* (Phase II) report that was prepared for The Frog, Switch & Manufacturing Company property (“Site”) on behalf of the U.S. Environmental Protection Agency (USEPA) and in support of the USEPA Region 3 Targeted Brownfields Assessment Program. The Phase II report was prepared by the U.S. Department of Transportation’s Volpe Center (Volpe), a USEPA contractor, and includes the scope, findings, and analytical results of their Phase II investigation as well as a discussion of the results relative to applicable Pennsylvania standards and recommended follow-up actions/next steps.

Volpe’s issuance of the “interim” report was to provide the findings of their initial sampling event and to support decisions being made as part of the overall remediation and redevelopment processes, including the potential for additional delineation sampling. The findings of this initial sampling event will be presented to the Pennsylvania Department of Environmental Protection (DEP) in an upcoming meeting where they will be instrumental in helping formulate additional sampling that may be required to fully delineate the environmental conditions and pursue regulatory closure to allow for reuse of the Site. The USEPA has indicated its commitment to have Volpe perform any additional sampling, which will likely occur towards the end of the first quarter 2026. A final Phase II report will be issued by Volpe upon completion of the additional sampling activities. In addition to the Phase II results, Volpe’s report discusses the scope and findings of a hazardous building materials survey completed by Viva Environmental, Health, & Safety LLC (Viva), a Volpe subcontractor.

A summary of the findings presented in Volpe’s December 2025 Interim Phase II report is provided below.

Background

The Phase II investigation was completed as a response to potential environmental concerns that were identified during a Phase I Environmental Site Assessment (ESA) completed by BL Companies in March/April 2025 on behalf of REC FS, LLC. The locations of these environmental concerns are depicted on the attached Exhibit 1. At the time of the Phase I ESA, the Site was in the process of being decommissioned by The Frog, Switch & Manufacturing Co., a heavy industrial/manufacturing facility that had operated at the property since the late 1800s (originally under the name “Carlisle Manufacturing Company”). Frog, Switch & Manufacturing Company ceased on-site manufacturing operations in 2023. Certain areas of environmental concern at the Site (e.g., the former residual waste landfill and the area of a former leaking underground tank) had already been investigated and remediated to the satisfaction of the DEP and therefore not assessed by Volpe’s Phase II.

The scope of the Phase II investigation was intended to supplement previous environmental investigations at the Site (which included both soil and groundwater sampling) through further evaluation of other potential buried tank locations and to further assess subsurface conditions in and around the specific areas of concern identified in the Phase I ESA.

Hazardous Building Materials Survey

The Hazardous Building Materials Survey (HBMS) was completed by Viva in September 2025 to evaluate the eight remaining buildings at the Site and to supplement the previous asbestos survey that had been conducted in May 2021 by others. The scope of the HBMS was intended as a pre-demolition level inspection and included an evaluation of the structures for asbestos, lead paint, PCBs, and other hazardous materials, including universal wastes.

The HBMS identified the following:

- **Asbestos-containing material (ACM)** was identified in numerous forms and locations throughout the on-site buildings, including window caulking, window glazing, tar mastic, floor tiles, rope material, thermal systems insulation, built-up and transite roofs, transite ceilings, and fire doors.

Prior to any demolition or renovation activities, regulated ACM must be properly abated in accordance with applicable state and federal regulations. With the exception of certain roofing materials which, as noted below, may be able to be removed in a non-friable manner, the identified ACM must be removed by a licensed asbestos abatement contractor prior to any renovations or demolition. It is our understanding that, because the buildings are in poor structural condition, they are slated for demolition.

Viva’s HBMS report estimated a total cost of approximately \$1,047,550 for the abatement and air monitoring oversight required to remove all ACM prior to demolition. Viva indicated that \$990,000 of the \$1,047,550 total estimated cost is for the abatement of

90,000 square feet of asbestos-containing roofing materials. Through proper management and handling during the building demolition process, Viva indicated that the built-up roofing materials can be removed and disposed of as construction waste and would not be regulated by EPA or the PA Department of Labor, thus significantly reducing the expected ACM abatement costs. This would potentially reduce the cost of abatement to closer to \$250,000. However, if the buildings were to be reused and the built-up roofing materials would then be subjected to sanding, grinding, cutting, or abrading during the renovation process, then EPA regulations would apply and removal by a licensed asbestos contractor (and the additional \$990,000) would be required for abatement of the ACM in the roofing materials.

- **Lead-based paint** was identified on components such as walls, stairs, windows, ceilings, doors, shelving, cabinets, handrails, machines, platforms, roof supports, concrete bollards, and catwalks.

Any painted surface containing lead should not be sanded, demolished, or disturbed without the proper engineering controls and work methods, per the applicable OSHA regulations. Prior to building demolition and waste disposal, the waste must be tested to determine if it meets the criteria for “hazardous waste”. Once characterization of the waste is completed, a disposal method will be determined. Although the cost for removal and disposal of the lead-based paint containing materials will depend on the disposal method, Viva provided a preliminary estimate for the abatement of lead paint from the on-site buildings of \$250,000.

- **Universal Waste**, including fluorescent light ballasts, refrigerants, mercury-containing devices (e.g., thermostats, switches, etc.), batteries, drums, etc. were identified and inventoried by Viva during the HBMS. Prior to any demolition or renovation activities, universal waste must be collected, properly containerized, and transported to an appropriate facility for recycling/disposal.
- **Contaminated Foundry Sand** was identified covering the majority of the floor and other interior surfaces of the Foundry building, and was stockpiled in certain areas of the Foundry building during the facility’s decommissioning process. The foundry sand was sampled for laboratory analysis and was found to be contaminated with manganese, cobalt, and iron at levels exceeding applicable State standards. The foundry sand must be tested for waste characterization purposes, removed, and disposed of appropriately. Although the cost for removal and off-site disposal of the foundry sand depends on the disposal facility and removal/disposal methods, a preliminary estimate for the removal/disposal is approximately \$250,000.

Phase II Investigation

Prior to the advancement of the soil borings in October 2025, a geophysical survey was conducted by Volpe to scan potential tank locations for evidence of remaining underground storage tanks

(USTs). The geophysical survey used a combination of ground-penetrating radar (GPR) and electromagnetic devices. It should also be noted that a known fuel oil UST that was identified during the ESA was removed by others in July 2025 with no evidence of leakage or residual soil impacts being encountered during the removal process. Volpe's geophysical survey did not identify any evidence of remaining buried tanks in the suspect areas that were scanned.

A total of 21 soil borings were advanced at the Site (see Exhibit 1) with a total of 43 soil samples being collected for laboratory analysis. The borings ranged in depth from approximately 2 to 32 feet below the ground surface, and groundwater was not encountered at the tested locations.

The soil samples collected from the borings were submitted to a laboratory to be analyzed for a combination of compounds and metals specifically selected based on the historic use of the Site, the findings of the 2025 Phase I ESA, and industry standards, herein referred to as "constituents of concern". The constituents of concern selected included inorganics (metals and free cyanide), volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), dioxins and furans, and total solids.

Below is a brief summary of the findings of the Phase II investigation:

- VOCs – no concentrations were detected in exceedance of applicable DEP standards.
- SVOCs – two of the samples contained at least one compound that exceeded the most stringent (residential) direct contact standard, but below the non-residential standards. The exceedances were also limited to surficial locations where soil staining was observed. In addition, SVOCs of this nature are often by-products of the burning of fossil fuels and are very common in soil at historic industrial facilities.
- PCBs – no concentrations were detected in exceedance of applicable DEP standards.
- Dioxins and furans – only the soil sample collected from the area of the July 2025 fire (east side of Frog Shop) was analyzed for these constituents. No concentrations were identified in excess of applicable DEP standards.
- Metals – Arsenic, cobalt, iron, and manganese were each detected in some of the soil samples at concentrations above their respective applicable DEP standards. Cobalt and iron were each detected in one sample at levels above applicable DEP standards. Manganese, which was historically utilized at the Site for the manufacturing of manganese steel castings for crushers, was detected in two of the shallow soil samples at concentrations above the applicable DEP standard. Arsenic was identified in 15 of the soil samples at levels above the applicable DEP standard.

Exhibit 2 (attached) depicts the locations of the above-referenced exceedances in soil at the Site, and the attached Table 1 provides a summary of the concentrations that exceeded the applicable DEP standards.

In general, the constituents of concern detected in soil at the Site appear to be relatively limited in extent and are not indicative of extensive releases or high levels of contamination, and the soil impacts can be managed under Pennsylvania's Voluntary Cleanup Program (aka, Act 2) to evaluate and mitigate potential exposure pathways and ultimately protect Site owners and occupants over the long term. The Act 2 remediation process is expected to involve the collection and analysis of additional soil samples for delineation purposes, possibly the excavation of shallow soils (aka, "spot remediation"), pursuit of a "Non-use Aquifer" designation for groundwater, exposure pathway elimination, and associated reporting. Preliminary discussions have occurred with the DEP to gain concurrence with the planned mitigation measures, including the formalization of a Non-use aquifer designation. The cost estimate for the Act 2 remediation process at the Site is approximately \$300,000.

Groundwater was not sampled as a part of the scope of work for Volpe's Phase II investigation; however, it has been sampled from monitoring wells that were historically located in various locations on the Site. One of the objectives for the recent soil sampling program was to evaluate the levels of impact in soil, to determine if (and to what extent) additional groundwater sampling may be warranted to evaluate potential exposure pathways. However, based on the levels and depths of the constituents detected in soils at the Site, in combination with the applicable "Non Use Aquifer" standards and preliminary discussions with the DEP, the Borough's "must connect" groundwater use ordinance, and the existing Environmental Covenant for the Site that restricts the use of groundwater, the installation/sampling of additional monitoring wells does not appear to be warranted at this time.

Conclusions

Based on the findings of the above-referenced investigation activities in combination with historical environmental investigations and remediation activities by others, it is BL Companies' opinion that redevelopment of the Site (including the demolition of the remaining structures, regrading, and construction of new improvements) is feasible and will include the following tasks:

- proper abatement and off-site disposal of asbestos, lead paint, and other waste materials;
- removal and off-site disposal of the contaminated foundry sand from the Foundry building;
- demolition of the on-site structures; and
- management of the residual environmental impacts in soil under the Act 2 program to address and eliminate potential exposure pathways, work with the DEP to formalize a "Non-use Aquifer" designation, and to obtain liability relief from the DEP.

BL Companies appreciates the opportunity to provide these environmental services to you. Should there be any questions regarding this report or the project in general, please do not hesitate to contact the undersigned.

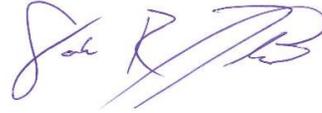
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Sincerely,

BL Companies

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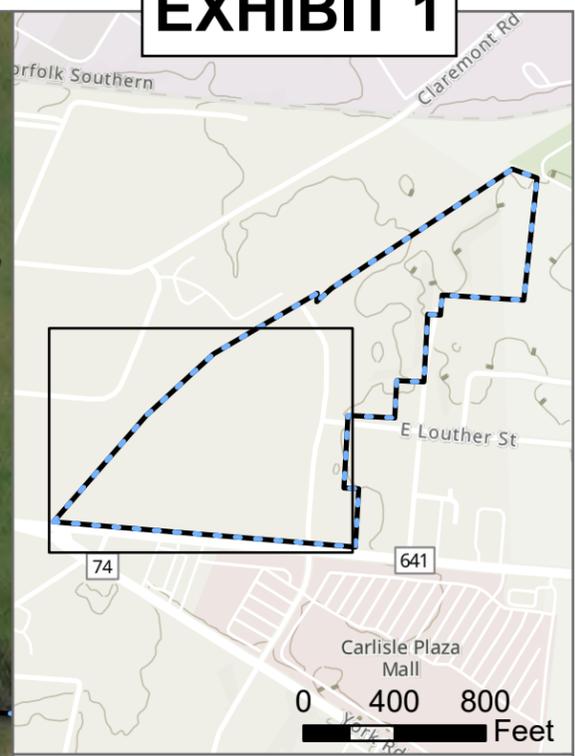
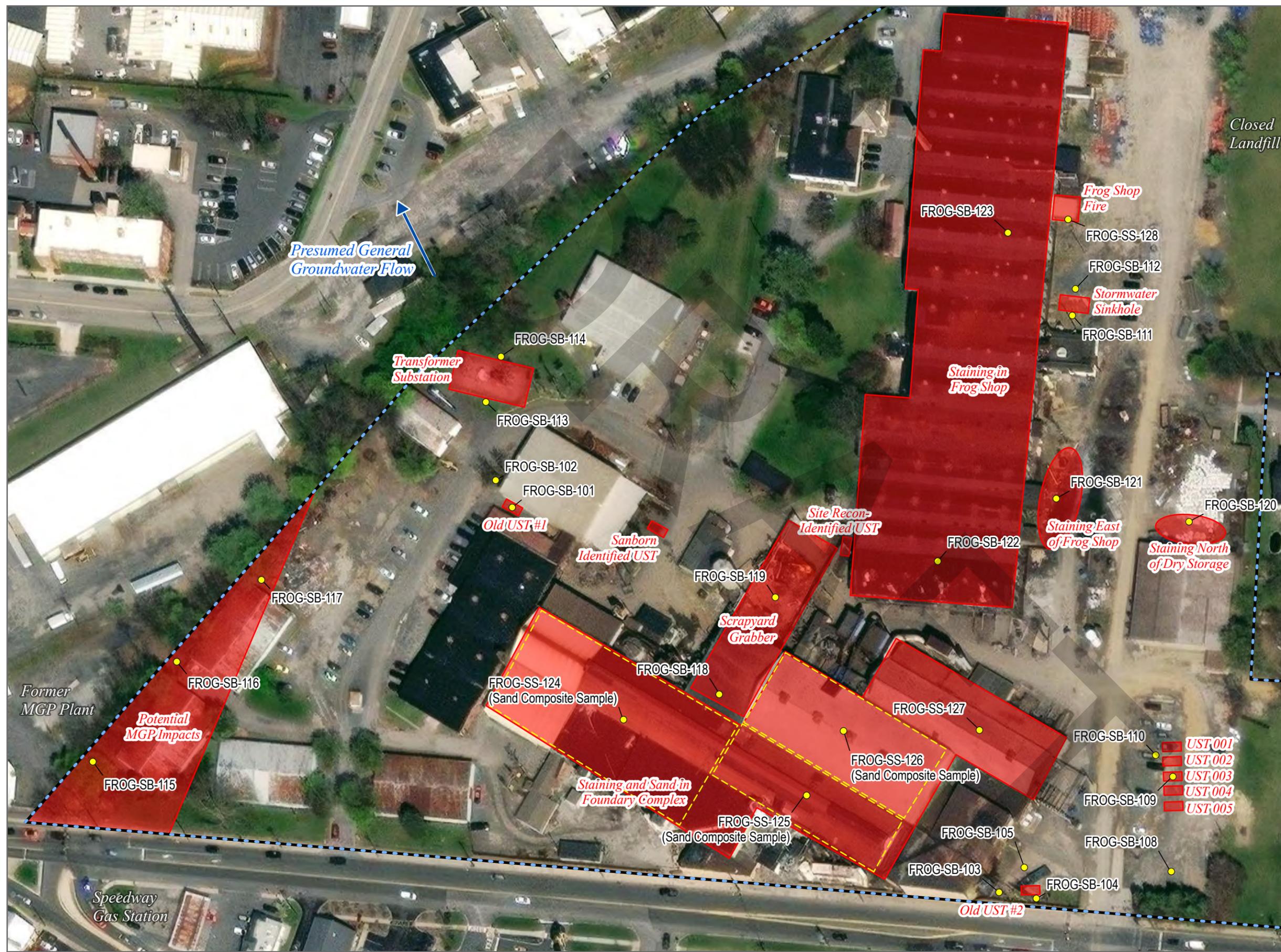
Niomi J. Phillips
Senior Project Scientist I

Handwritten signature of John R. Thatcher, P.G. in blue ink.

John R. Thatcher, P.G.
Senior Project Manager

Attachments

EXHIBIT 1



- Legend**
- Soil Sample
 - ▭ Foundry Sand Composite Sample Area
 - ▭ Recognized Environmental Condition
 - ⬢ Property Boundary (approx.)

- Notes:**
- 1) Soil samples collected in October 2025.
 - 2) Recognized Environmental Conditions shown as described in the Phase I ESA Report plus the July 2025 fire at the Frog Shop.
 - 3) Sample locations have not been professionally surveyed and were mapped based on aerial imagery features. Locations will be professionally surveyed following groundwater monitoring well construction.



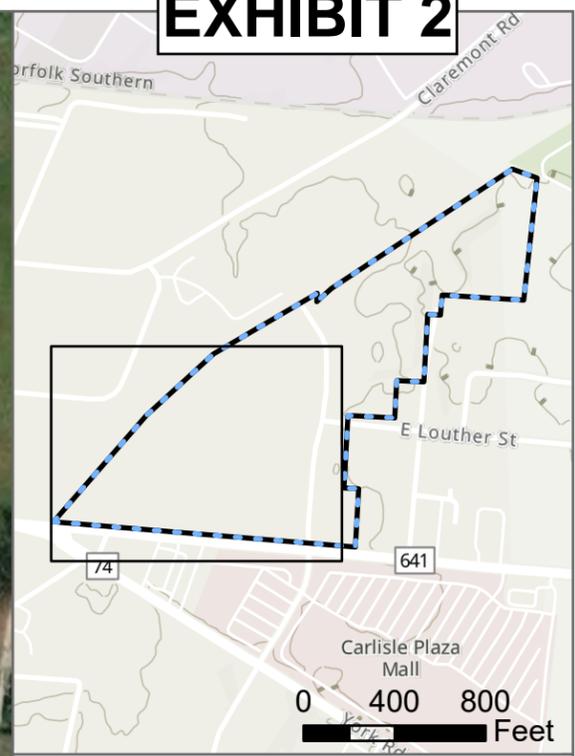
Figure 2
Soil Sample Locations
Interim Phase II ESA Report
Frog, Switch & Manufacturing Company
600 East High Street, Carlisle, PA

Spatial Reference:
NAD 1983 StatePlane Pennsylvania South FIPS 3702 Feet
Upper Left: 2127941.36E 317338.47N ftUS

Sources: Microsoft, Vantor, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community



U.S. Department of Transportation
Volpe National Transportation Systems Center
December 2025



- Legend**
- Soil Samples**
- No Direct Contact MSC Exceedances
 - Exceeds a Residential Direct Contact MSC
 - Exceeds a Non-Residential Direct Contact MSC
 - Surficial Sample
 - Subsurface Sample
 - Property Boundary (approx.)

Notes:

1) Soil samples compared to PADEP direct contact numeric values for residential [R] and non-residential [NR] soil. Analytes that exceed an MSC are listed in callout boxes.

Abbreviations:
 arsenic (As), cobalt (Co), iron (Fe), manganese (Mn), benzo(a)anthracene (BaA), benzo(b)fluoranthene (BbF), benzo(a)pyrene (BaP), indeno(1,2,3-cd)pyrene (IND)



Figure 3
 Direct Contact MSC Soil Exceedances
 Interim Phase II ESA Report
 Frog, Switch & Manufacturing Company
 600 East High Street, Carlisle, PA

Spatial Reference:
 NAD 1983 StatePlane Pennsylvania South FIPS 3702 Feet
 Upper Left: 2127949.87E 317259.63N ftUS

Sources: Microsoft, Vantor, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

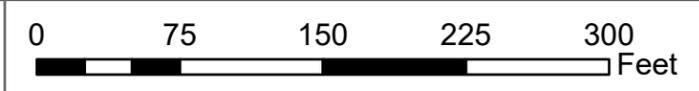


Table 1 - Soil Analytical Results - Exceedances of Direct Contact Standards Only

Frog Switch Manufacturing

600 E High Street

Carlisle, Pennsylvania

Sample ID: (Sample Depth (feet))	Medium-Specific Concentrations			FROG-SS-103 (0-2)	FROG-SS-105 (1-3)	FROG-SS-105 (13-15)	FROG-SS-108 (1-3)	FROG-SS-108 (5.5-7.5)	FROG-SS-118 (0-2)	FROG-SS-118 (10-12)	FROG-SS-119 (0-0.5)	FROG-SS-119 (0.5-1)	FROG-SS-120 (0-2)	FROG-SS-120 (2-3.5)	FROG-SS-121 (0-2)	FROG-SS-121 (20-21.5)	FROG-SS-122 (30-32)	FROG-SS-123 (17-19)	FROG-SS-126 (FLOOR)	FROG-SS-127 (FLOOR)	
	Direct Contact Residential	Direct Contact Non-Residential Surface Soil	Direct Contact Non-Residential Subsurface Soil																		
Metals																					
arsenic	12	61	190,000	16.3	138	23.8	38.0	16.9	18.9	12.7	16.9	15.4	12.1	22.0	22.1	13.8	14.0	13.8	9.61	14.3	
cobalt	66	960	190,000	101	18.2	9.66	14.0	9.14	66.0	32.9	45.6	15.1	13.7	28.6	34.4	13.5	18.2	7.33	69.9	44.7	
iron	150,000	190,000	190,000	73,500	64,600	50,400	19,400	29,600	98,200	83,900	194,000	50,500	47,200	62,500	111,000	30,200	32,300	41,300	99,900	158,000	
manganese	31,000	190,000	190,000	4,780	8,830	502	443	598	7,580	924	60,900	36,900	13,300	10,700	8,880	3,070	2,510	252	20,300	30,200	
Semivolatile Organic Compounds																					
benzo(a)anthracene	6.1	130	190,000	0.050J	0.22	<0.13	0.033J	<0.13	<0.12	<0.12	0.15J	0.12	6.6	1.5	3.8	<0.12	<0.15	<0.12	0.040J	0.021J	
benzo(b)fluoranthene	3.5	76	190,000	0.098J	0.33	<0.13	<0.13	<0.13	<0.12	<0.12	0.31J	0.34	9.5	2.0	5.0	<0.12	<0.15	<0.12	<0.10	<0.098	
benzo(a)pyrene	4.2	91	190,000	0.063J	0.21	<0.18	<0.17	<0.17	<0.16	<0.16	<0.72	0.21	6.7	1.5	3.7	<0.16	<0.20	<0.16	<0.13	<0.13	
indeno (1,2,3-cd) pyrene	3.5	76	190,000	0.051J	0.14J	<0.18	<0.17	<0.17	<0.16	<0.16	0.16J	0.18	3.8	1.0	2.5	<0.16	<0.20	<0.16	<0.13	<0.13	

Notes:

Sample results are compared to PADEP Direct Contact MSCs under 25 Pa. Code Chapter 250, Administration of the Land Recycling Program.

Grey results are not detected above the laboratory reporting limit

Bold results are detected above laboratory reporting limit

Yellow Highlighted results exceed the PADEP direct contact numeric values for residential soil

Orange Highlighted results exceed the PADEP direct contact numeric values for non-residential soil

J: Estimated value. The target analyte concentration is below the laboratory reporting limit, but above the method detection limit

Values following < are the laboratory reporting limit

All values are expressed in milligrams per kilogram (mg/kg) = 1 part per million (ppm)

Samples collected by Volpe (October 2025)