

**IMMEDIATE INVESTIGATION WORK ASSIGNMENT**

**MARY HARRIMAN PARK**

**HARRIMAN, NEW YORK**

Prepared for

New York State Department of Environmental Conservation

March 2000

Prepared by

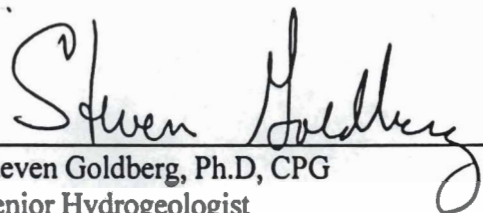
IT Corporation  
Crossroads Corporate Center  
One International Blvd., Suite 700  
Mahwah, New Jersey 07495

Project 804219

**Immediate Investigation Work Assignment  
Mary Harriman Park  
Harriman, New York**

The material and data in this report were prepared under the supervision and direction of the undersigned.

EMCON



Steven Goldberg, Ph.D, CPG  
Senior Hydrogeologist



Dana Boyadjian  
Program Manager

## **CONTENTS**

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<b>SUMMARY</b>	<b>iv</b>
<b>1 INTRODUCTION</b>	<b>1-1</b>
<b>2 AERIAL PHOTOGRAPHIC INTERPRETATION</b>	<b>2-1</b>
<b>3 GEOPHYSICAL INVESTIGATION</b>	<b>3-1</b>
<b>4 TEST PIT INVESTIGATION</b>	<b>4-1</b>
<b>LIMITATIONS</b>	
<b>APPENDIX A SURFACE GEOPHYSICAL SURVEY REPORT</b>	
<b>APPENDIX B TEST PIT PHOTOGRAPHS</b>	

## SUMMARY

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An investigation was conducted to determine the presence/absence of buried drums beneath the baseball field area at the Mary Harriman Park. The investigation consisted of an examination of historical aerial photographs, a surface geophysical investigation, and a test pit program. The results of this investigation indicated that there was no evidence of buried drum disposal at the site.

## 1 INTRODUCTION

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The Mary Harriman Park is located off Route 17 in the Village of Harriman, New York. The park consists of baseball fields, a hockey rink, playground, and open space. Based on reports by members of the community, it had been suggested that the potential existed for buried drums of waste to be located under the baseball field in the park. Consequently, the New York State Department of Environmental Conservation (NYSDEC) agreed to conduct an investigation to confirm the presence or absence of buried drums.

In response to the above, IT Corporation, under contract to NYSDEC, completed the following investigation program:

- Review of historical aerial photographs to determine the presence or absence of ground disturbance or other visual evidence that would suggest the burial of drummed waste.

Completion of a geophysical investigation to identify any subsurface anomalies that may be suggestive of buried drums.

- Completion of a test pit investigation to identify anomalies identified during the geophysical investigation.

Details of the investigation are provided in the following sections.

## **2 AERIAL PHOTOGRAPHIC INTERPRETATION**

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Historical aerial photographs were obtained as stereoscopic pairs from NYSDEC and were examined for any site activities that may have been suggestive of waste disposal practices. Aerial photographs from 1948 to 1990 were examined. The results of the evaluation are provided below. Aerial photographs are on file with NYSDEC.

### **October 22, 1948**

In the 1948 aerial photograph, the Mary Harriman Park boundaries appeared similar to current boundaries. The site has been cleared; a small group of trees is seen in the vicinity of the current baseball field (in shallow left field). A road is seen to loop from the access road across the site to the train station. The far northwest corner of the site also appears to have limited tree coverage. Due to the scale of the photograph, it is difficult to determine if objects or trees are present at the intersection of the access road (Meadow Road) and Route 17. The majority of the area north of the access road and within the park is a pond that exists to the present day.

### **July 17, 1957**

The site has changed slightly from the 1948 photograph. The group of trees located near the south corner of the site is no longer present. The access road and loop are still present. The northwest corner of the site still has limited tree coverage. Due to the scale of the photograph, it is difficult to determine if objects or trees are present at the intersection of the access road (Meadow Road) and Route 17.

### **May 29, 1970**

The site appears similar to the 1957 photograph. An area of dead or disturbed vegetation is seen along the access road within the site. A baseball diamond is seen in the southern corner of the site. A white, semi-circular object or area of disturbed vegetation (in the vicinity of the present day memorial plaque and flagpole) is seen near the intersection of the access road and Route 17, but is not indicative of any industrial activity.

### **April 30, 1975**

The 1975 aerial photograph shows the presence of another baseball diamond located within the loop road adjacent to the access road. A white, semi-circular object or area of

disturbed vegetation (in the vicinity of the present day memorial plaque and flagpole) is seen near the intersection of the access road and Route 17.

**April 19, 1980**

The 1980 aerial photograph is similar to the 1975 photograph. The baseball diamonds, access road, and loop road are all still present.

**November 19, 1990**

The 1990 photograph shows the loss of one of the baseball diamonds and the loop road, and the addition of a structure near the current salt shed.

Based on evaluation of these aerial photographs, there appears to be no indication of industrial activities or significant ground disturbance in the area of investigation that would indicate that drums had been buried at the site.

### 3 GEOPHYSICAL INVESTIGATION

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A surface geophysical investigation was performed at the baseball field from February 8-12, 2000. The objective of the investigation was to locate subsurface metallic objects that would potentially represent buried drums. The geophysical survey was conducted using magnetic, time- and frequency-domain electromagnetic induction, and ground penetrating radar techniques.

The geophysics investigation report describing the geophysical investigation is provided in Appendix A to this report.

In summary, the investigation identified 7 specific site anomalies, designated as A-1 through A-7 that had geophysical characteristics and dimensions of buried metal objects potentially representing drum(s). These anomalies were identified to reside at shallow depths (less than 5 feet below ground surface). The location and characteristics of these anomalies are described in Appendix A.

Based on the geophysical results, test pits were excavated at each of the anomalies to identify the nature of the subsurface materials. The findings of the test pit program are provided in the following section.



## 4 TEST PIT INVESTIGATION

A test pit program was conducted on March 6, 2000 to characterize the anomalies identified during the geophysical investigation. The backhoe was provided by the Village of Harriman.

The test pits were excavated to depths ranging from about 1.5 to 5 feet. All of the pits were excavated in fill and were comprised of boulders and sands with minor amounts of silt. With the exception of anomaly A-4, metal debris or metal objects were identified in all of the test pits. A specific description of each test pit is provided in Table 1, below. Appendix B contains a photographic record of the test pit excavations. There was no evidence of buried drums in any of the test pits.

Table 1

Test Pit No.	Test Pit Dimensions (L x W x D)	Description
A-1	10' x 5' x 3'	Sand with some silt; boulders. Metal debris consisting of nails, pipe sections, and straps encountered at about 2 feet below ground surface.
A-2	9' x 5' x 3.5'	Sand with some silt; boulders. An approximate 3-inch diameter pipe along the length of the excavation was encountered at about 2.7 feet below ground surface.
A-3	10' x 6' x 4'	Sand with some silt; boulders. A 1-inch diameter pipe along the length of excavation was encountered at about 2 feet below ground surface.
A-4	8' x 10' x 5'	Sand with some silt; few boulders. No metal debris was apparent in the excavation
A-5	10' x 6' x 4'	Sand with some silt; boulders. Miscellaneous metal debris encountered at approximately 2 feet below ground surface
A-6	8' x 4' x 1.5'	A brick cistern or well was encountered which was covered with an approximate 5.5-foot diameter cement cap with rebar at about 1 foot below ground surface.
A-7	10' x 6' x 3'	Sand with some silt; boulders. Metal debris encountered at 2 to 3 feet below ground surface.

L = length  
W = width  
D = depth

## LIMITATIONS

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The services described in this report were performed consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. These services were performed consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

mk

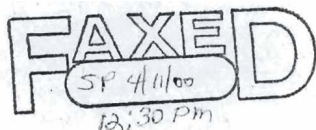
# New York State Department of Environmental Conservation

## Division of Public Affairs and Education, Region 3

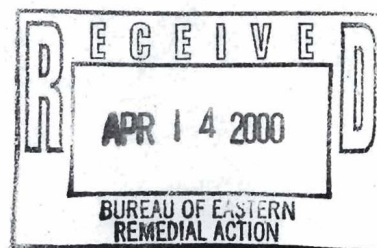
21 South Putt Corners Road, New Paltz, New York 12561-1696

Phone: (914) 256-3018 • FAX: (914) 255-0714

Website: [www.dec.state.ny.us](http://www.dec.state.ny.us)



April 11, 2000



Honorable William J. Larkin, Jr.

Member of Senate

1093 Little Britain Road

New Windsor, NY 12553

Dear Senator Larkin:

Thank you for forwarding the concerns of your constituent Chris Pia regarding the Mary Harriman Park in the Village of Harriman. This site has been thoroughly evaluated due to its proximity to the Gaess inactive hazardous waste remediation site and in response to requests from the Village of Harriman.

As you know, DEC's consultant IT Engineering of New York, recently completed an investigation of the possible presence of buried drums of waste under the old baseball field in the park. Based on the investigation performed, there is no evidence of drums of waste buried in the park.

In addition, in response to a request from the Village of Harriman Mayor Gayser, IT Engineering sampled surface water from the pond in Mary Harriman Park. The results of this investigation indicate the water quality of the pond has not been affected by any point sources of potential pollution. Rather, the water quality is reflective of natural conditions and run off from surrounding roads.

As to Mr. Pia's concern about the specific park property "in between the Gaess environmental site and the water well...", please be advised that as part of the Gaess remediation project, a soil gas survey was conducted at Mary Harriman Park to identify the contamination migration pathways and any other possible sources of TCE and TCA. Seventy-six samples were collected. Gaess was the only source of TCE and TCA identified.

In addition, as part of the Gaess remediation project, surface water and sediment samples were taken from the Ramapo River. No TCE or TCA from the Gaess site was detected.



Honorable William J. Larkin, Jr.

Page 2

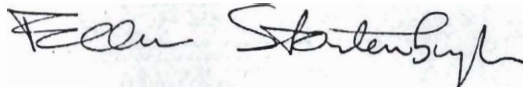
April 11, 2000

A map showing the location of the Gaess site soil gas survey sample locations at Mary Harriman Park and the Ramapo River is enclosed for reference.

However, the only identified possible human exposure pathway associated with the Gaess site is the ingestion of the TCE-contaminated groundwater through the public drinking water supply well. With the installation and continued operation and monitoring of the air stripper system at the Village supply well, that pathway has been eliminated.

Based on the sampling results, the Village Code Enforcement Officer Wayne A. Ward has reopened the park.

Sincerely,



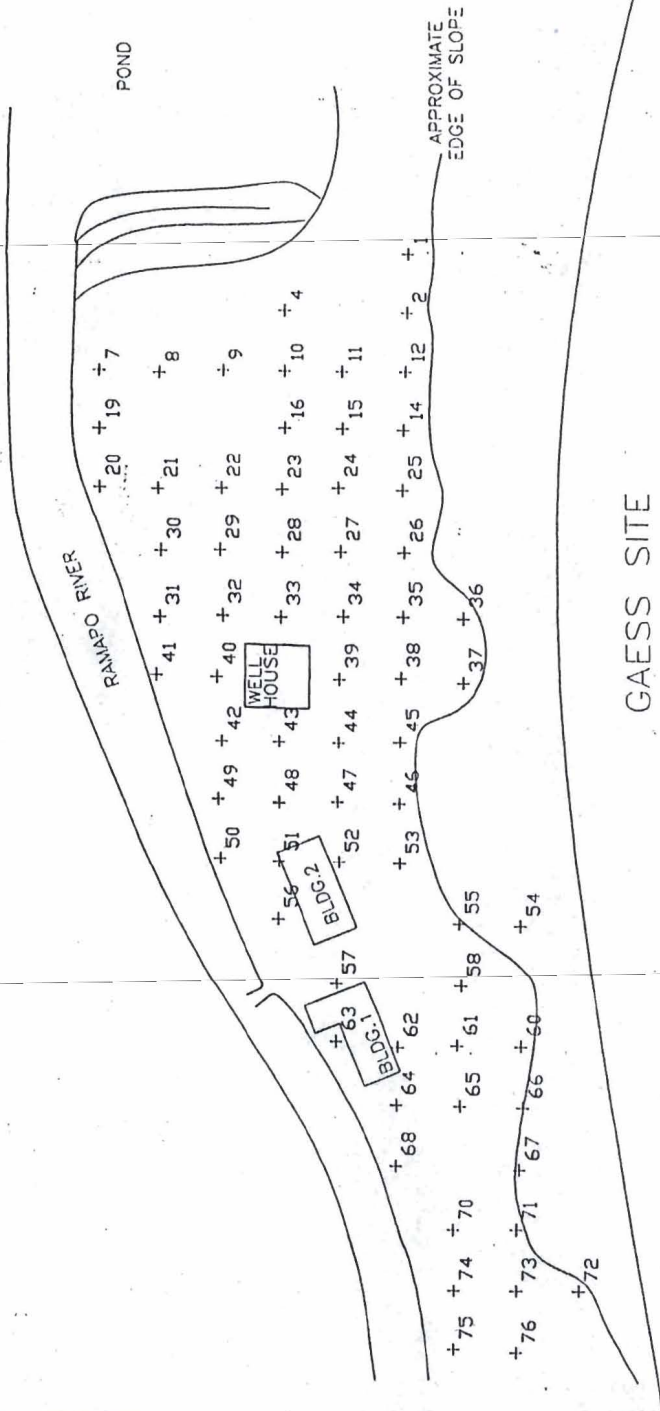
Ellen R. Stoutenburgh  
Public Affairs Director  
Region 3

ERS:MK:SP

Enclosure

cc: M. Moran  
M. Komoroske

a:larkin.wpd(4/2000)



Northeast Research Institute LLC 805 Farley Street Lakewood, Colorado 80215 (303) 238-0090		Drawn By: JCS Checked By: JCS Project Manager: JCS	Project #: 2048E Date: May 18, 1994 File Name: 2048_1.dwg	RUST Environment & Infrastructure Gaess Site Hartman, New York 	LEGEND Features: + Petrex Sample Location	Sample Locations Plate 1
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THE SENATE  
STATE OF NEW YORK

Fax Cover Sheet

WILLIAM J. LARKIN, JR.  
SENATOR, 19TH DISTRICT  
CHAIRMAN  
MAJORITY STEERING COMMITTEE

PLEASE RESPOND TO:  
Q ROOM 913  
LEGISLATIVE OFFICE BLDG.  
ALBANY, NY 12247  
(518) 455-2770

Q 1093 LITTLE BRITAIN ROAD  
NEW WINDSOR, NY 12553  
(914) 567-1270

INTERNET ADDRESS:  
LARKIN@SENATE.STATE.NY.US

CHAIRMAN  
RACING, GAMING &  
WAGERING COMMITTEE  
COMMITTEES  
BANKS  
ELECTIONS  
HEALTH  
HOUSING, CONSTRUCTION & COMMUNITY  
DEVELOPMENT  
INSURANCE  
MENTAL HEALTH & DEVELOPMENTAL DISABILITIES  
VETERANS & MILITARY AFFAIRS

SENATOR WILLIAM J. LARKIN, JR.  
1093 Little Britain Road  
New Windsor, New York 12553

DATE: March 7, 2000  
TO: Ellen Stoutenberg/DEC  
FROM: Kathie (914-567-1270)

NUMBER OF PAGES  
INCLUDING COVER SHEET: 2

SUBJECT: Mary Harriman Ballfields

We received the attached e-mail from Christopher Pia of Monroe concerning testing of the baseball field at the park. Mr. Pia thinks the entire park should be tested. Are there any plans to test other areas of the park? Thanks, Kathie

=====

If all pages are not received, please call 914-567-1270. The fax number is 914-567-1276.



From: BIONAIL --SENATE  
To: LARKIN --SENATE

Date and time 02/17/00 23:53:38

From:  
Subject: (U) Mail From the NYS Senate Website

Sender is a Person

+  
Name - Christopher Pia  
E-Mail Address - thapias@yahoo.com  
Street - 241 Elm Street  
City - Monroe  
State - NY  
Zip - 10980  
Phone - 783-9552

This E-Mail was created on 17 February 2000 at 13:14:52

+  
Dear Mr Larkin,

I am very much interested in the Mary Harriman Ballfields situation. If the Politicians and the DEC really cared about our children, why was only one baseballfield tested. Our concern call for burying of barrels in the park and under the ballfields. The park consists of swings, Hockey rink, Basketball court and a waterwell that is contaminated with a low level of TCM (trichloroethylene). This chemical was supposed to be cleaned up during the superfund site of Gaess Environmental. This sit they pull two trucks of chemicals out of the hill our children play on during the summer. In between the Gaess Environmental site and the waterwell is the park. The water well is near the swings and the ballfield that wasn't tested. I believe that this is a direct conflict of interest for the DEC as well as the village of Harriman in doing tests in this park. By doing only one ballfield it starts to become a credibility issue. I know people are calling me a nut but I have only one question for you to answer. Why? only one ballfield and what are you going to do about this? Keep in mind they stated these fields were never tested and they had a true concern for the community. Why not test the whole park? I think this case need a special prosecutor to look into.

Honorable William J. Larkin, Jr.  
April 11, 2000

bc: G. Bruening  
L. Stark



Honorable William J. Larkin, Jr.  
April 11, 2000

bc: S. Bobarakis  
G. Donohue



John P. Cahill  
Commissioner



## **New York State Department of Environmental Conservation**

### **Division of Public Affairs and Education, Region 3**

21 South Putt Corners Road, New Paltz, New York 12561-1696

Phone: (914) 256-3018 • FAX: (914) 255-0714

Website: [www.dec.state.ny.us](http://www.dec.state.ny.us)

May 2, 2000

Bernadette Pia  
241 Elm Street  
Monroe NY 10950

Dear Mrs. Pia:

As a follow up to our recent telephone conversation about Mary Harriman Park in the Village of Harriman, please be advised that DEC has thoroughly evaluated the site due to its proximity to the Gaess inactive hazardous waste remediation site and in response to requests from the Village of Harriman.

As you know, DEC's consultant IT Engineering of New York, investigated the possible presence of buried drums of waste under the old baseball field in the park. Based on the investigation performed, there is no evidence of drums of waste buried in the park.

In response to a request from the Village of Harriman Mayor Gayser, IT Engineering sampled surface water from the pond in Mary Harriman Park. The results of this investigation indicate the water quality of the pond has not been affected by any point sources of potential pollution. Rather, the water quality is reflective of natural conditions and run off from surrounding roads.

In addition, as part of the Gaess remediation project, a soil gas survey was conducted at Mary Harriman Park to identify the contamination migration pathways and any other possible sources of TCE and TCA. Seventy-six samples were collected. Gaess was the only source of TCE and TCA identified. Also, as part of the Gaess remediation project, surface water and sediment samples were taken from the Ramapo River. No TCE or TCA from the Gaess site was detected.

The only identified possible human exposure pathway associated with the Gaess site is the ingestion of the TCE-contaminated groundwater through the public drinking water supply well. With the installation and continued operation and monitoring of the air stripper system at the Village supply well, that pathway has been eliminated.

Based on the sampling results, Village Code Enforcement Officer Wayne A. Ward Bernadette Pia

Page 2  
May 2, 2000

reopened the park in April. Whether or not parents allow their children to use the park is a matter of personal choice.

Please contact me if I can be of further assistance.

Very truly yours,

Ellen. Stoutenburgh  
Public Affairs Director  
Region 3

cc: M. Moran  
M. Komoroske

a:bpia.wpd(n2)

New York State Department of Environmental Conservation  
Division of Environmental Remediation  
Bureau of Eastern Remedial Action, Room 242  
50 Wolf Road, Albany, New York 12233-7010  
Phone: (518) 457-3395 • FAX: (518) 457-4198  
Website: www.dec.state.ny.us



FILE COPY

Ac.

April 6, 2000

The Honorable Charles W. Gayser  
Mayor, Village of Harriman  
P O Box 946  
1 Church Street  
Harriman, New York 10926

Dear Mayor Gayser:

RE: Mary Harriman Park

As requested, enclosed is a copy of the letter report on the laboratory results of surface water samples collected from the pond in the Mary Harriman Park. The results of the investigation indicate that the water quality of the pond has not been affected by any point source(s) of potential pollution. Also enclosed is a copy of the Immediate Investigation Work Assignment report for the aerial photographic interpretation, geophysical investigation and test pit investigation tasks performed in February and summarized in my March 7, 2000 letter to Mr. Wayne Ward.

I would like to thank the Village of Harriman for the cooperation we received in conducting the recent investigations at the park. If you have any questions on the above, please feel free to call Ms. Ellen Stoutenburgh at (914) 256-3018.

bc: M. Moran  
E. Stoutenburgh w/enclosures.  
A. Klauss  
R. Pergadia  
S. McCormick  
M. Komoroske

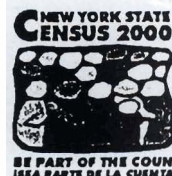
Sincerely,

*Mike Komoroske*

Michael J. Komoroske, P.E.  
Bureau of Eastern Remedial Action  
Div. of Environmental Remediation

Enclosure(s)

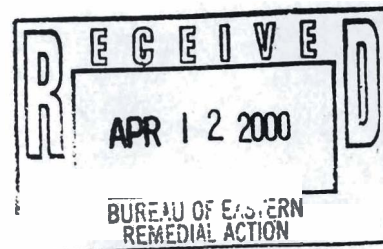
c: Mr. Wayne A. Ward, Village of Harriman  
Mr. Mark Knudsen, NYSDOH  
Mr. Lee Bergus, Orange County Health Department





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

APR -6 2000



Mr. Christopher T. Pia  
241 Elm Street  
Monroe, New York 10950

Dear Mr. Pia:

Thank you for your E-MAIL message of November 20, 1999 to First Lady Hillary Clinton concerning the Nepera Chemical Company in Harriman, New York. In your correspondence, you expressed your concern about numerous past spills from the Nepera facility, the lack of environmental testing on Little League baseball fields adjacent to the Nepera plant, and the need to take appropriate action to ensure the health and safety of individuals using these baseball fields.

The New York State Department of Environmental Conservation (NYSDEC) has taken significant steps to correct the conditions at Nepera that led to the past release of pyridine compounds from the facility. NYSDEC has required Nepera to implement several physical modifications to its pyridine production process that are designed to reduce the likelihood of a pyridine release. An Order on Consent issued by NYSDEC on March 10, 2000 also requires Nepera to provide funding for on-site third party monitoring personnel for the early detection of any air pollutant releases. The Order also requires Nepera to make improvements to an infrared air monitoring system at the facility's fence line, purchase and install two meteorological towers, purchase three recordable air monitors for the Monroe-Woodbury School District, make improvements to the community notification system, conduct emergency response drills with the community, and pay a \$62,500 penalty. Furthermore, the Order on Consent requires Nepera to undertake a second, more detailed review of its operations and to implement any recommendations from that review that would lessen the likelihood of air releases from the facility.

With regards to the environmental testing of the old baseball field in the Mary Harriman Park, the NYSDEC has recently completed a literature and records search, reviewed historical aerial photographs and conducted interviews with Village of Harriman personnel and local citizens. In addition, NYSDEC has conducted a surface geophysical investigation which resulted in the identification and subsequent excavation of metal debris (i.e., old water pipes, scrap metal) that was located during the geophysical survey. Based upon the investigations performed, the NYSDEC has concluded there is no evidence of drums of waste buried in the park.

These findings were forwarded via letter dated March 7, 2000 to Mr. Wayne Ward, Code Enforcement Officer for the Village of Harriman, and a full report documenting these findings will be forwarded to the Village of Harriman within the next several weeks.

In addition, NYSDEC will be reviewing the records for the Gaess-SCA inactive hazardous waste site adjacent to the park (and the newer field) and will provide the Village of Harriman with a summary of all sampling that has been performed at the park. A report will also be prepared for the March 14, 2000 surface water sampling of the pond in Mary Harriman Park. The samples taken from the pond will be analyzed for the full compound list (TCL) organics (i.e., volatiles, pesticides/PCBs), and target analyte (TAL) metals (i.e., iron, lead), plus cyanide, pyridine, alpha picoline and 2-amino pyridine.

We appreciate the concerns regarding this situation and we will continue to work closely with NYSDEC to ensure that adequate progress is made in preventing further releases to the community from the Nepera facility.

Sincerely,



Kathleen C. Callahan  
Director  
Division of Environmental Planning and Protection

cc: Robert Stanton, Regional Air Pollution  
Control Engineer  
New York State Department of  
Environmental Conservation - Region 3

Michael J. Komoroske, P.E.  
New York State Department of  
Environmental Conservation - Albany





John P. Cahill  
Commissioner

**New York State Department of Environmental Conservation  
Regional Director, Region 3**

21 South Putt Corners Road, New Paltz, New York 12561-1696

Phone: (914) 256-3003 • FAX: (914) 255-0714

Website: [www.dec.state.ny.us](http://www.dec.state.ny.us)

March 16, 2000

The Honorable Charles W. Gayser  
Mayor, Village of Harriman  
P O Box 946  
1 Church Street  
Harriman NY 10926

Dear Mayor Gayser:

I am writing in response to your March 9, 2000 letter to Ellen Stoutenburgh which requested DEC test the pond in Mary Harriman Park. DEC has evaluated this request and has determined that under the circumstances a modest investigation is warranted.

The contract under which the old baseball field at the park was investigated, and which confirmed that there is no evidence of drums of waste buried in the park, has been amended. IT Engineering collected surface water samples of the pond on March 14<sup>th</sup> and will have them analyzed for the full target compound list (TCL) organics and target analyte list (TAL) metals plus cyanide. Pyridine, alpha-picoline and 2-amino pyridine will also be included in the analysis. DEC expects to have a brief report on IT's findings by March 30<sup>th</sup>.

In addition, DEC will be reviewing the records for the Gaess-SCA inactive hazardous waste site adjacent to the park and will provide the village with a summary of all of the sampling that has been performed at the park. I believe this information will be helpful to the Village Board in making future decisions about the park.

Please contact me or Ellen Stoutenburgh if you have any questions.

Regards,

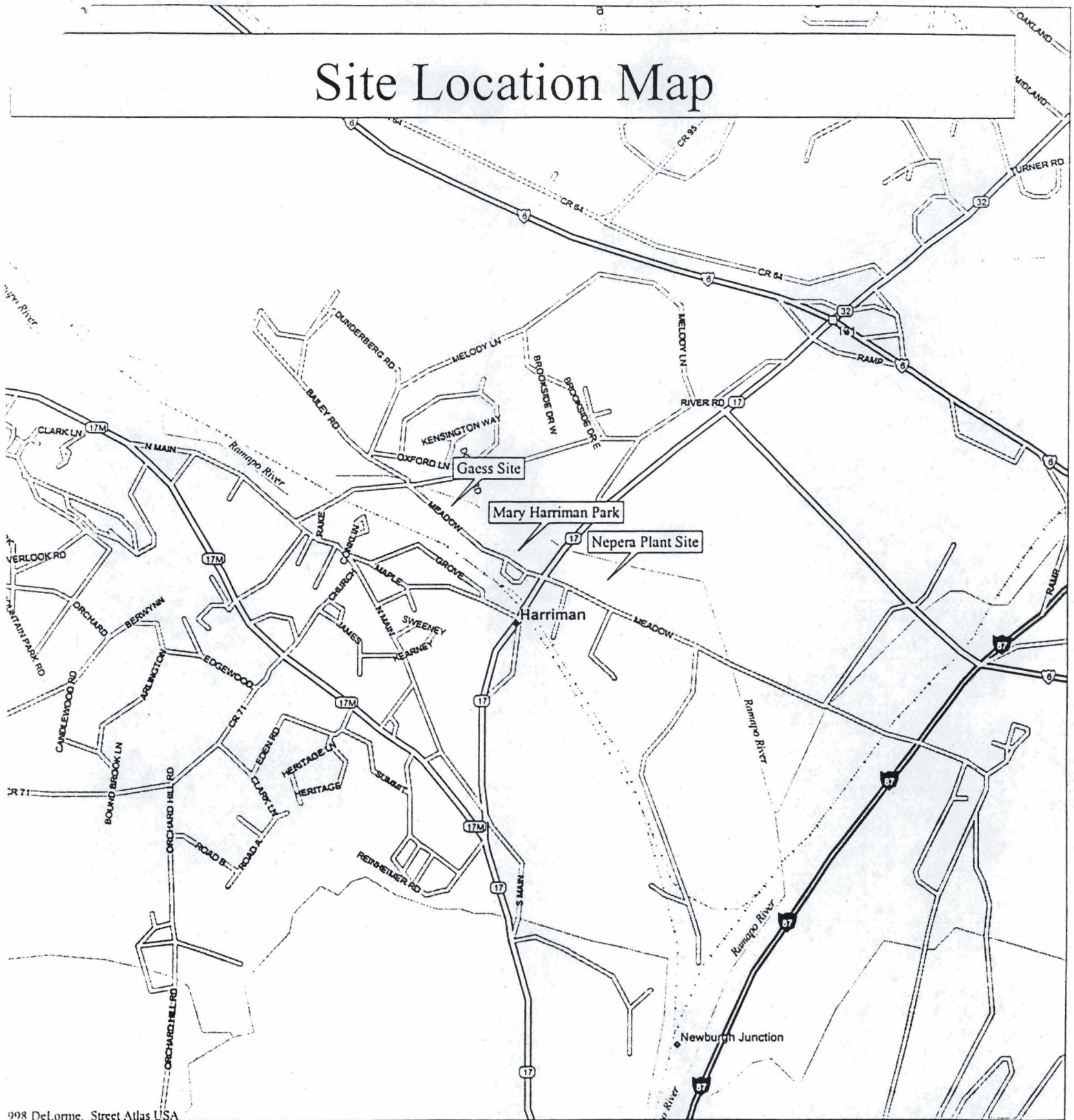
Marc Moran  
Regional Director

cc: Ellen Stoutenburgh  
Sue McCormick  
Mike Komoroske  
Al Klauss  
Ram Pergadia  
Mike Knipfing  
Cesare Manfredi  
Bob Stanton  
Maryanne O'Connor  
John Kennedy  
Jonah Triebwasser

a:gayser.wpd/n2



# Site Location Map



998 Delorme, Street Atlas USA

ig 15.00

Jan 21 14:15 2000

ale 1:15,625 (at center)

000 Feet

500 Meters

Local Road

Major Connector

State Route

Interstate/Limited Access

Toll Highway

US Highway

Exit

Utility/Pipe

Railroad

Small Town

Locale

Water

Woodland

River/Canal

mk

# NEPERA

A **CAMBREX** Company

Nepera, Inc.  
Route 17  
Harriman, NY 10926  
Tel: (914) 782-1200  
Fax: (914) 783-9713

December 20, 1999

Michael Komoroske, P.E.  
New York State Department of Environmental Conservation  
Bureau of Eastern Remedial Action  
Division of Environmental Remediation  
50 Wolf Road  
Albany, NY 12233-7010

## SUBJECT: MARY HARRIMAN PARK TITLE SEARCH

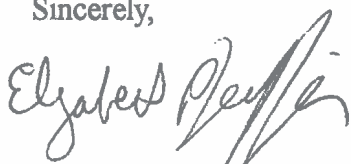
Dear Mr. Komoroske:

Enclosed please find a copy a copy of the above-referenced Title Search which confirms that neither Nepera, Inc. nor it's predecessors have owned Mary Harriman Park.

The land was conveyed to The Village of Harriman by deed from William Averill Harriman and Marie Harriman in 1948.

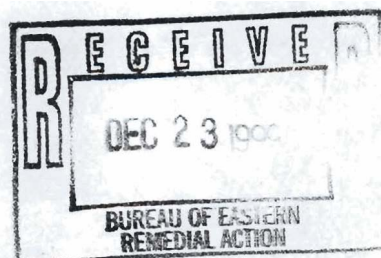
Please contact me if you have any additional questions related to this search.

Sincerely,



Elizabeth Pfeiffer  
Director, Environmental, Health & Safety  
Nepera, Inc.

cc: J. Van Hulle -w/o enclosure  
S. Gagliardo-w/o enclosure  
S. Levine-w/o enclosure  
M. Fletcher-w/o enclosure  
W. Ward - Village of Harriman w/enclosure



# CEO TITLE AGENCY INC.

*'When it's time to close'*

399 Knollwood Road, Suite 313  
White Plains, N.Y. 10603-1933  
(914) 683-5313  
Fax (914) 683-3265

November 30, 1999

Summit Title Agency Inc.  
Attn: Giselle Raymond  
47 Summit Avenue  
Hackensack, NJ 07601

Re: Title No. CEO-99-6513  
Premises: Mary Harriman Park  
Route 17 North  
Harriman, New York

Dear Ms. Raymond:

We have searched the records and indices of the ORANGE County Clerk's Office as of 11/19/99 for the purpose of determining chain of title for the past 30 years for the above referenced premises.

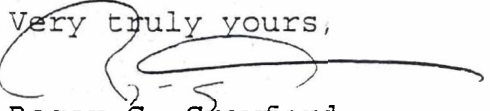
Set forth below are our findings:

Title In: The Village of Harriman, a municipal corporation of the County of Orange.

Source of Title: By deed from William Averell Harriman and Marie N. Harriman dated 12/28/48 recorded 2/7/1949 in Liber 1113 page 93. (see copy)

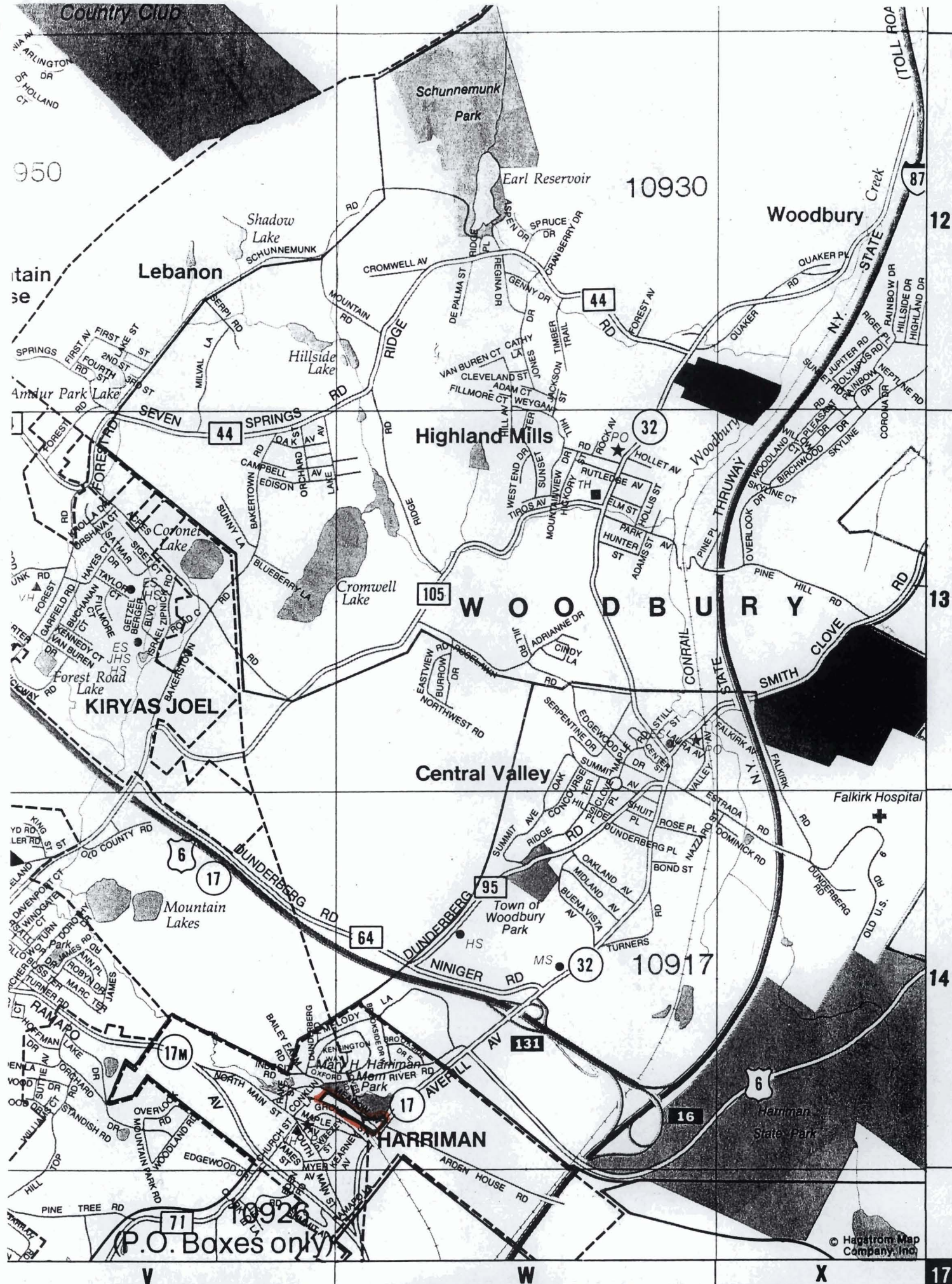
Thank you for choosing CEO Title Agency, Inc. for this search. This search is provided FOR INFORMATION ONLY. NO POLICY WILL BE ISSUED. Liability is limited to the fee paid for negligence only. If you have any questions, please do not hesitate calling our office.

Very truly yours,

  
Roger C. Crawford  
President & Chief Counsel

RCC:bz  
enclosures





FOR ADJOINING AREA SEE MAP NO. 18

FOR ADJOINING AREA SEE MAP NO. 21