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PHASE I ENVIRONMENTAL ASSESSMENT GATEWAY OFFICE COMPLEX WHITE PLAINS, NEW YORK

Prepared for:
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EXECUTIVE SUMMARY

Pursuant to that certain contract dated as of December 3, 1999 by and between Dames & Moore and CB Richard Ellis Investors L.L.C., a Delaware limited liability company, Dames & Moore was retained by CB Richard Ellis to conduct a Phase I Environmental Assessment of the Gateway Office Complex, in White Plains, Westchester County, New York ("subject property") to determine the potential for surface and/or subsurface contamination at the subject property from the presence of hazardous materials and or waste.

The subject property comprises three city blocks and is approximately 5 acres in size and is developed with a 20-story office tower, a 5-story parking garage and a asphalt surfaced parking lot. The office building comprises approximately 520,000 square feet and was completed in 1986. Tenants within the building primarily conduct general office administrative activities; no current tenant uses of the subject property were observed that would be likely to create a Recognized Environmental Condition at the subject property. The bottom level of the garage is also used as a bus station for the Westchester County public bus line.

Based upon the results of previous subsurface investigations, groundwater is encountered at depths ranging from approximately 12 to 30 feet below ground surface (bgs), and likely flows in a southwesterly direction towards the Bronx River.

The history of the property has been traced back to the 1860s when the property was farmland and was purchased by the New York and Harlem Railroad to be used as a freight yard. In 1885, the property was improved with dwellings, stables, a rail line and retail establishments. In subsequent years, a coal and lumber yard, an asphalt plant, several gas stations, auto repair facilities, a fire station , dwellings, and a dry cleaner occupied the property. The subject property was part of the White Plains Urban redevelopment project which was initiated in the mid-1960s when the previous improvements were razed.

Soil and groundwater investigations and some remedial activities have been conducted on the parking garage and surface parking lot areas of the subject property by several consultants. These previous investigations have detected generally low levels of semi-volatile organic compounds (SVOCs), chlorinated solvents, metals and PCBs within the soils, some at concentrations that slightly exceed regulatory guidance values. Environmental Risk Limited (ERL), a consultant to the current owner, concluded that no further investigation was warranted, that the parking garage and surface parking lot was effectively limiting the residual soil contaminants impact on the environment, and that some special soil handling and disposal may be required if the areas are developed in the future.

No representative soil borings or groundwater sampling has been conducted on the office tower parcel to evaluate the potential impact of the former gasoline stations, auto repair facility and dry cleaners that may have impacted the parcel. Soil sampling in the 2,000 gallon underground storage tank (UST) pit in 1991 by ESE detected Total Petroleum Hydrocarbons (TPH) at a concentration of 15,900 mg/kg or ppm, which ESE attributed to spillage during excavation to uncover the tanks. Limited shallow soil sampling was conducted by ERL in 1999 in the vicinity of an abandoned 2,000 gallon UST. While low levels of TPH were detected, Dames & Moore concluded that the testing was insufficient to evaluate the UST's impact on soil or groundwater. The historic activities on the office tower parcel and incomplete subsurface investigation of the site and UST represent a potential Recognized Environmental Condition on the office tower parcel.

At the time of the site inspection, Dames & Moore observed hazardous materials within the office tower penthouse to include two partially full drums of waste solvents (mostly paint thinner) and two 55 gallon drums of waste oil mostly generated from equipment maintenance. The drums were placed on secondary containment pallets and housekeeping was considered satisfactory. Other bulk chemicals onsite were primarily located in the penthouse and consisted of boiler and cooling tower water treatment chemicals which are typically non-hazardous. There were no indications of spills or releases in the vicinity of these chemicals.

An active 10,000 gallon fuel oil UST and the previously discussed closed-in-place 2,000 gallon fuel oil UST are located on the office tower parcel. Both tanks were apparently installed around 1985 during construction of the building. The abandoned 2,000 gallon tank failed an integrity test in 1989, 1990 and/or 1991 and is a closed New York State Leaking Underground Storage Tank (LUST) site. Based upon Dames & Moore's review of previous reports and our conversation with Mr. Melley, the building's chief engineer, the 2,000 gallon tank was filled with concrete grout. The active 10,000 gallon UST passed a tightness test in January 1999. No overfill protection or spill prevention devices exist for the active UST.

Dames & Moore also observed an emergency generator and associated ±40 gallon aboveground storage tank (AST) within the mechanical penthouse. The AST appeared to be in good condition with no visible signs of leakage or spills.

Previous asbestos surveys of the office building and garage conducted by others collected and analyzed 77 suspect materials for asbestos and did not identify asbestos containing materials (ACMs).

The subject property was listed in the environmental database five times. Two Leaking Underground Storage Tank (LUST) listings were for the office tower's 2,000 gallon closed-in-place UST, which has a "closed" remediation status. One UST listing is for the 10,000 gallon and 2,000 USTs on the office tower parcel. One listing at the office tower is for ATT, a RCRA small quantity hazardous waste generator. ATT is no longer a tenant at the subject property and its presence is not expected to create a Recognized Environmental Condition. Finally, a RCRA large quantity hazardous waste generator (LQG) identified as "White Plains General Auto Rep" located at 76 Hamilton Ave. This facility is believed to have been one of the auto repair/gas stations previously located on the north side of the office tower and was removed circa 1967 - 1968 when Hamilton Avenue was widened. This facility had the potential to impact the subject property with petroleum products and chlorinated solvents. Due to the nature of activities and the limited environmental testing on the office tower parcel, the RCRA LGQ has the potential to create a Recognized Environmental Condition on the subject property. The database identified a number of sites in the

vicinity of the subject property including two "case closed" gasoline LUST sites located potentially hydrogeologically upgradient and less than a half a mile away from the subject property.

Based on the review of prior studies and the results of the Phase I Environmental Site Assessment of the subject property, further investigation and actions are warranted. Dames & Moore recommends that a comprehensive subsurface investigation be conducted in order to determine if the previous gas stations identified on the south side of Hamilton Avenue and the suspected former dry cleaners have impacted soil and groundwater quality on the office tower parcel. The investigation should also address the former leaking UST at the southwest corner of the property in order to determine whether or not soils under the base of the tank and groundwater have been impacted. Previous investigations conducted to date had discrepancies in groundwater flow direction. The proposed Phase II ESA should definitively determine the groundwater gradient. In addition, it is recommended that the 10,000-gallon #2 fuel UST that serves the emergency generator and boilers, be upgraded to include spill and overfill prevention in order to be in compliance with Federal and State UST regulations.

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1.0 INTRODUCTION

Pursuant to that certain contract dated as of December 3, 1999 by and between Dames & Moore and CB Richard Ellis, Dames & Moore was retained by CB Richard Ellis to conduct a Phase I Environmental Assessment of the Gateway Plaza Office Complex, in White Plains, Westchester County, New York ("subject property"). There are three distinct parcels of the subject property which will be referred to in the report as the "office tower" located on the south side of the subject property; the "parking garage", located on the north side of subject property, and the "central parking area" located in between the office tower and parking garage.

The environmental assessment was performed, and this report prepared, in accordance with the contract and generally accepted practices employed by reputable nationally recognized environmental consulting firms. The Phase I Environmental Assessment objectives, scope and limitations are presented in the following sections.

1.1 OBJECTIVE

The objective of Dames & Moore's Phase I Environmental Assessment was to evaluate whether current or historical activities on or adjacent to the subject property may have resulted in significant contamination by hazardous materials or wastes, which is subsequently referred to in this report as a "Recognized Environmental Condition." A Recognized Environmental Condition is defined as:

> "The presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, groundwater or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The term is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

1.2 SCOPE OF WORK

Dames & Moore's Scope of Work for the Phase I Environmental Assessment consisted of an inspection of the subject property and nearby area, a review of historical information on activities on the subject property, review of readily available regulatory information concerning the subject property and nearby properties of environmental concern, and preparation of a report detailing Dames & Moore's results, conclusions, and recommendations. Unless indicated otherwise, search radii are in conformance with the ASTM Standard E1527-97. The Scope of Work as agreed to with CB Richard Ellis Investors is presented in Appendix A.

It should be noted that a Phase II Environmental Assessment (EA) was conducted concurrently with the Phase I EA. Some geology and hydrogeology information have been excerpted from the Phase II EA. The results of the Phase II EA are presented in a separate report.

1.3 LIMITING CONDITIONS

Dames & Moore's site inspection included a walking inspection of areas that were accessible by foot, and a drive-by inspection of surrounding and adjacent properties, including those properties identified in the environmental database search.

1.4 LIMITATIONS OF THE ASSESSMENT

The Phase I Environmental Assessment was prepared in accordance with the Scope of Work described in Section 1.2 and presented as Appendix A. The work conducted by Dames & Moore is limited to the services agreed to with CB Richard Ellis Investors, and no other services beyond those explicitly stated should be inferred or are implied.

The conclusions presented in this report are professional opinions based solely upon Dames & Moore's visual observations of the site and the immediate site vicinity, and upon Dames & Moore's interpretations of the readily available historical information, conversations with personnel

knowledgeable about the site, and other readily available information, as referenced in the report. These conclusions are intended exclusively for the purpose stated herein, at the site indicated, and for the project indicated.

This report is intended for the sole use of CB Richard Ellis Investors. The scope of services performed during this investigation may not be appropriate for other users, and any use or re-use of this document, or the findings, conclusions, or recommendations presented herein is at the sole risk of said user.

This study was not intended to be a definitive investigation of possible contamination at the subject property. The purpose and scope of this investigation was to determine if there is reason to suspect the possibility of contamination at the site.

This report is intended to be used in its entirety. No excerpts may be taken to be representative of the findings of this assessment. Opinions and recommendations presented in this report apply to site conditions and features as they existed at the time of Dames & Moore's site visit, and those reasonably foreseeable. They cannot necessarily apply to conditions and features of which Dames & Moore is unaware and has not had the opportunity to evaluate.

2.0 SITE DESCRIPTION

2.1 PHYSICAL LOCATION AND DESCRIPTION OF PROPERTY

The subject property is approximately 5 acres in size and comprises three city blocks of downtown White Plains. The property is developed with one ±520,000 gross square foot, 20 story office building on the south side of the property and a 5-level parking garage located on the north-side of the site. The two structures are separated by an asphalt paved surface lot, and a partially below grade garage under New Street which separates the surface lot from the garage. The garage and the office building were constructed from 1984 to 1986 and the surface lot was constructed between 1995 and 1996. A site location map is provided as Figure 1. A site plan is provided as Figure 2.

The office building is constructed over a foundation of conventional spread footings and has a foundation walls of cast-in-place concrete. The building's superstructure is also of cast-in-place concrete. The exterior walls are covered with an insulated glass curtain wall that has brown tint and the flat roof is covered with a built-up system. Heating to the building is provided by oil and gas-fired boilers located in the penthouse that distribute low pressure steam to perimeter fin tube radiators and central air handling units. Cooling to the building is provided by a chilled water system utilizing centrifugal chillers and rooftop cooling towers. Vertical transportation is provided by traction elevators and two escalators, and emergency electrical power is provided by a diesel-fired generator. The city of White Plains provides potable water and wastewater services for the subject property, and Consolidated Edison provides electricity and natural gas.

2.2 ENVIRONMENTAL SETTING

Environmental characteristics including topography, soils, geology, hydrogeology, and hydrology were evaluated based on published literature, previous reports, maps, and site observations.

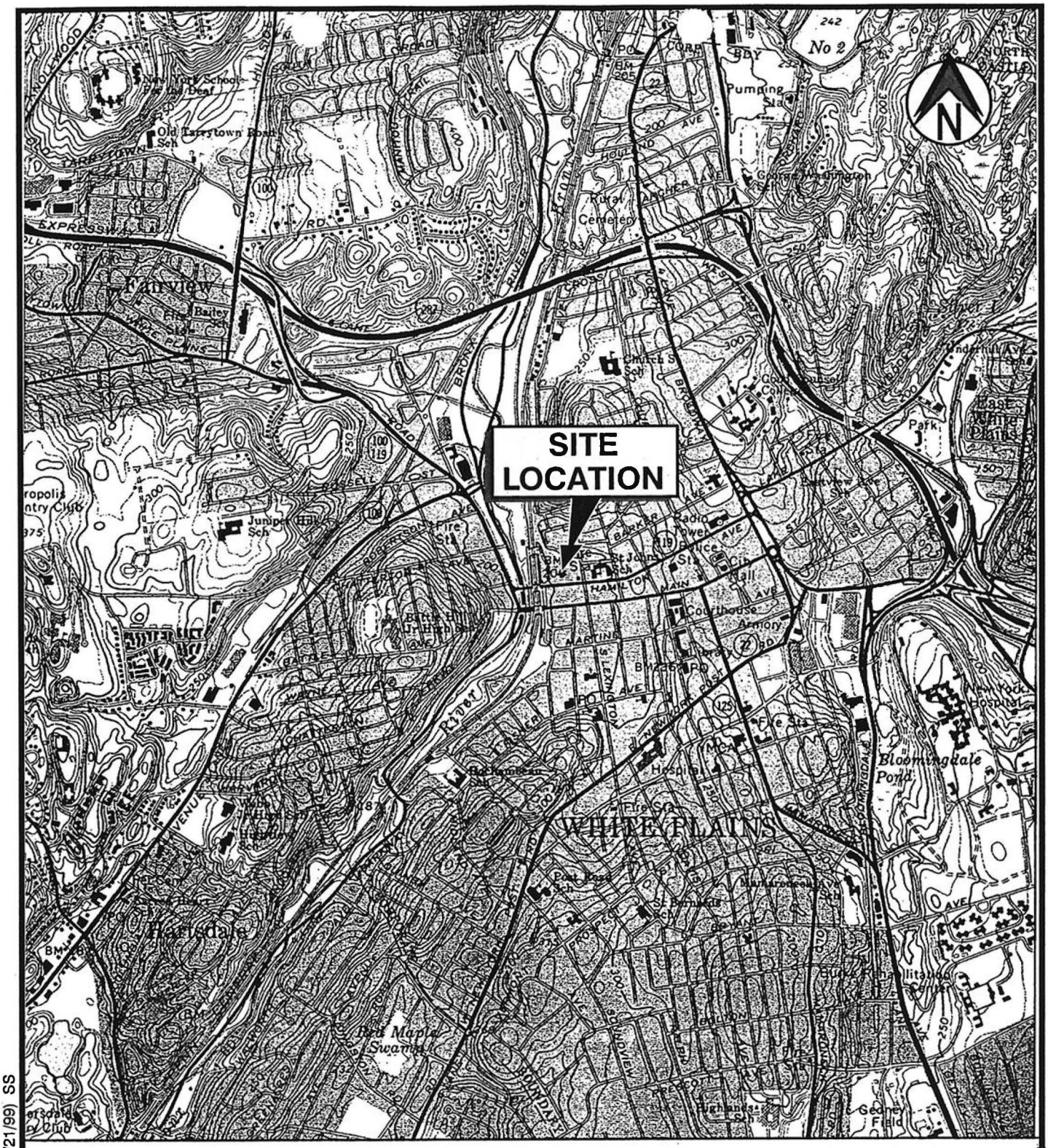

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FIGURE 1
SITE LOCATION MAP
GATEWAY OFFICE COMPLEX
WHITE PLAINS, NEW YORK

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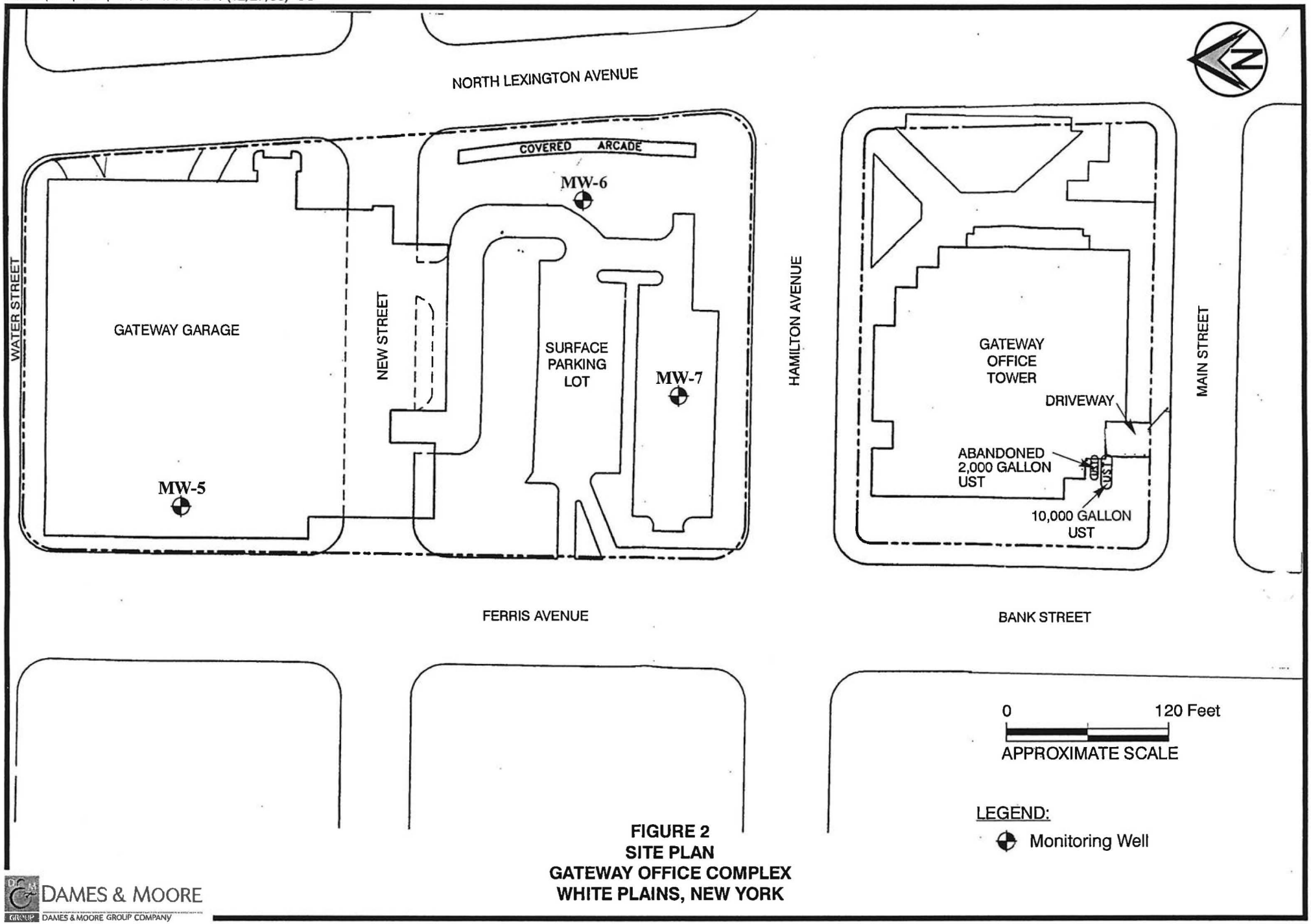

FIGURE 2
SITE PLAN
GATEWAY OFFICE COMPLEX
WHITE PLAINS, NEW YORK

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2.2.1 Topography

The United States Geological Survey's *White Plains, New York* 7.5 minute topographic quadrangle (1967) indicates that the subject property is located at an elevation of 200-210 feet above sea level. The property is located in a river valley, with a predominant gentle slope to the south-southwest towards the Bronx River. Surrounding properties to the north and northeast are at a higher topographic elevation

The intersection of Hamilton and Lexington Avenues is the highest point on the property. From this area, the site slopes down to the southwest, and north / northwest. The central asphalt surfaced parking area has been developed into a terraced parking areas that slopes to a below grade parking deck under New Street.

Stormwater runoff from the paved and landscaped areas flow to stormwater inlets and is discharged to the municipal sewer system. One sump within the garage under New Street exists in the area, and stormwater from same is pumped to the White Plains municipal system.

2.2.2 Soils

Based upon Dames & Moore's soil borings that were conducted during the Phase II EA and Dames & Moore's review of soil boring logs which were included in the construction documents, soils to depths of 40 feet or more consists of medium to course grained sands with trace amounts of silt.

2.2.3 Geology and Hydrogeology

Based upon our review of the construction documents, weathered bedrock is found from 48 feet below ground surface (bgs) along the eastern side of the site, which drops down to ±96 feet bgs along the western portion of the property. This bedrock consists of the Fordham Gneiss formation. Based upon the results of previous subsurface investigations and Dames & Moore's Phase II EA, groundwater is encountered at depths ranging from approximately 12 to 30 feet bgs. Previous

investigations conducted by other consultants had discrepancies in groundwater flow direction. The 1993 BCM report indicated groundwater flow in a southwestern direction, while the latest 1999 ERL groundwater sampling and analysis indicated groundwater flow in a northwestern direction. As part of the Phase II EA, Dames & Moore used groundwater elevation data from seven wells located throughout the property, as opposed to three from the previous studies. Based upon the findings from Dames & Moore's Phase II ESA, groundwater flows in a southwestern direction towards the Bronx River.

3.0 PRESENT SITE CONDITIONS

Conditions on the subject property and surrounding areas were assessed through a site reconnaissance conducted by Mr. Douglas Olson, P.E. of Dames & Moore from December 6 through 10, 1999. Mr. Mike Martino, property manager, and Mr. Bob Melley, Chief Engineer, accompanied Dames & Moore during the site investigation and were available to answer questions concerning the subject property. Messrs. Martino and Melley are employed by Alan B. Ashforth Inc., the property management firm for the subject property. Curricula Vitae for Dames & Moore personnel involved in the preparation of this report are included as Appendix B. Photographs taken during the site inspection are included as Appendix C.

3.1 CURRENT USES OF THE PROPERTY

The Gateway Tower office building is currently used for commercial office purposes with associated parking and landscaped areas. Tenants of the subject property utilize the building for general office space. A cafeteria style restaurant exists on the building's first floor. None of the current tenants' operations are likely to create a Recognized Environmental Condition on the subject property.

The ground level of the parking garage located on the northern side of the subject property is used as a bus station by the Westchester County bus authority. A small management office also exists within the garage. The station primarily acts as transfer point for many of the local bus routes and sees traffic throughout most of the day and evening. No bus maintenance or other automotive repair takes place at the station and Dames & Moore did not identify any evidence of petroleum bulk storage tanks in this area.

3.2 SITE OBSERVATIONS

3.2.1 Hazardous Substances

At the time of the site inspection, Dames & Moore observed hazardous materials in the mechanical penthouse. Two partially full 55-gallon drums of waste solvent (paint thinner), and two partially full 55 gallon drums of waste oil were observed. The drums were located on a secondary containment pallet and no evidence of spillage or leakage was observed. The waste solvent was reported to be paint thinner and various cleaning solvents used for building maintenance. Waste oil has been generated by the routine maintenance of mechanical equipment such as the air-conditioning chillers. These wastes are removed on an as needed basis (usually once per year) by a private hazardous waste hauling firm. Based on available information and Dames & Moore's interviews and visual observations, it is unlikely that the storage and handling of hazardous substances has created a Recognized Environmental Condition on the subject property.

3.2.2 Hazardous Wastes

With the exception of the small quantity of waste generated by building maintenance activities, Dames & Moore observed no evidence of hazardous waste activities on the subject property. Messrs. Martino and Melley indicated that no current tenants have generated hazardous wastes within the building.

3.2.3 Underground/Aboveground Storage Tanks

An active 10,000-gallon fuel oil UST and a closed-in-place 2,000-gallon fuel oil UST exist at the southwest corner of the Gateway building. Both tanks were apparently installed in 1985 during construction of the building, and the active 10,000-gallon UST passed a tightness test in January 1999 (Refer to Appendix F for the latest testing results). No overfill protection or spill prevention measures exist for the active UST.

The closed-in-place 2,000 gallon tank failed an integrity test in 1989, 1990 and/or 1991. Based upon Dames & Moore's review of previous reports and conversation with Mr. Melley, the tank was filled with concrete grout. During the tank closure, it appears as though an attempt to remove the UST was made, but its proximity to the building foundation and the existing tank likely prohibited its removal. As such, the tank was closed-in-place. During the closure activities, a soil sample from the top of the tank identified TPH contaminated soil at 15,900 ppm which was reportedly the result of a spill during the excavation of soil in order to get to the tank. Four other composite samples taken from the excavation pile had TPH concentrations ranging from 50 to 100 ppm (below action levels), which were used as backfill. The contaminated soil that resulted from a spill during the excavation was reportedly removed with shovels.

In August 1999, Environmental Risk Limited (ERL) conducted a subsurface investigation around the USTs with a hand auger and advanced four borings to a depth of approximately 10 feet bgs. Analytical testing of the soil samples indicated low levels of petroleum contamination (under 100 ppm TPH). ERL concluded that the petroleum levels were typical to urban areas and that no petroleum was released from the USTs.

It is unknown whether or not the ERL soil borings to a depth of 10 feet bgs had reached the soil horizon at the bottom of the active 10,000 gallon, or closed-in-placed 2,000 gallon USTs. As such, these borings would not be sufficient to determine if the soils beneath the USTs had been impacted by releases. In addition, these previous investigations, never addressed whether or not groundwater under the USTs had been impacted. Based upon the insufficient testing around the USTs, it is Dames & Moore's opinion that the USTs have potentially created a Recognized Environmental Condition on the subject property.

The 2,000 gallon closed-in-place UST is also listed as a "Closed" Leaking Underground Storage Tank" (LUST) facility wit the NYSDEC. Please refer to the Regulatory Agency Investigation which is included as Section 5.0 of this report.

3.2.4 Drums and Containers

With the exception of drums stored in the penthouse for water treatment chemicals, air conditioning refrigerant, and waste oil/solvents, 55 gallon drums for storing waste or other hazardous materials were not observed.

3.2.5 PCB-Containing Equipment

Several utility owned electrical transformers exist on the west side of the building in an underground vault in which Dames & Moore was not provided access to. The transformers are the property of the site's electrical utility provider, Consolidated Edison. Consolidated Edison assumes responsibility for leaks and spills from their equipment, regardless of the PCB content. Based on the age of the units, it is unlikely that the units contain PCBs.

Fluorescent light ballasts are located throughout the facility. No light ballasts were available for inspection at the time of the site visit. Based on the age of the building, it is unlikely that the ballasts are PCB containing.

3.2.6 Solid Waste

Solid waste generated at the subject property consists of typical office waste, which is disposed in numerous dumpsters located in the loading dock area of the building. This waste is removed by a private contractor five days per week. No stains or odors were observed in the vicinity of the onsite dumpsters.

3.2.7 Drains and Sumps

Dames & Moore observed numerous stormwater drains located throughout the paved and landscaped areas of the subject property. The storm water drains are reportedly connected to the municipal sewer system. No evidence of spills, leaks or introduction of hazardous substances into the stormwater drains were observed during the site inspection. A sump exists in the basement level of

the Gateway building and the New Street parking garage; both of which discharge to the municipal sanitary and storm sewer systems respectively. No odors were observed to be originating at either of these sumps.

3.2.8 Wastewater

Other than the sanitary wastewater and storm water discharges discussed above, there were no reported or observed industrial wastewater discharges from the subject property. There were no indications of septic systems observed or reported on the subject property.

3.2.9 Wells

Seven groundwater monitoring wells exist throughout the property. One well installed in 1993 by BCM Engineers exists at the ground level of the parking garage. An additional two wells installed by BCM at the central parking lot were destroyed during the parking lot's 1995-1996 development. However, these former wells were replaced with the existing two wells installed by ERL in 1999. Four wells were also recently installed by Dames & Moore in December 1999 as part of the Phase II EA. Three wells are located on the Gateway tower parcel, and one well was installed on the northeast corner of the parking garage. The wells are constructed of PVC casings and screens and range in depth from ±24 to 35 feet below ground surface. All wells have flush mounted covers and depth to groundwater in the wells ranged from 12 to 30 feet bgs. Analytical testing results for various contaminants are presented under separate cover in Dames & Moore's Phase II EA.

3.2.10 Pits, Ponds, and Lagoons

No pits, ponds or lagoons were observed on the subject property or in the immediate vicinity.

3.2.11 Other Physical Evidence of Contamination

Dames & Moore did not observe any other physical evidence of contamination during the site inspection.

3.3 ASBESTOS-CONTAINING MATERIALS

Two asbestos surveys have been conducted at the subject property. The first survey was conducted in April 1991, by BCM Engineers at the parking garage, and consisted of the sampling and analysis of 14 separate materials utilizing Polarized Light Microscopy (PLM). None of the samples analyzed tested positive for asbestos. The second asbestos survey was performed by Leadsafe in July 1999 at the office tower. This most recent survey consisted of the sampling and analysis of 57 suspect materials utilizing PLM. None of the samples analyzed tested positive for asbestos. Sampling and analysis of materials within tenant spaces or roofing materials were not conducted.

3.4 RADON

Radon is a naturally occurring radioactive gas that is found in soil and rocks. Radon flows through the voids in rocks and soils to the surface. Radon is of some concern when it collects in low-lying enclosed spaces, such as a basement.

Dames & Moore reviewed the U.S. EPA's map of Radon Zones for New York regarding radon concentrations for the subject property. The map was produced in conjunction with the USGS, and is based on a statewide study of uranium geologic features with high potential for radon. All counties within the state have been assigned to one of three zones as determined by their predicted average screening level for radon. Geologic provinces in Zone 1 have a predicted average screening level greater than 4.0 picoCuries per Liter (pCi/L). Zone 2 corresponds to a predicted average screening level between 2.0 and 4.0 pCi/L, and Zone 3 corresponds to a predicted average screening level of less than 2.0 pCi/L.

The map indicates that Westchester County was assigned to Zone 2 (2.0-4.0 pCi/L). Based upon the building's commercial air handling capacity, and the usage of the buildings as office space, it is Dames & Moore's opinion that the potential for the accumulation of radon gas at the subject property is low.

3.4 LEAD-IN-WATER

Based on the 1986 completion of the onsite improvements, lead in drinking water is unlikely to be a significant concern at the subject property.

3.5 SURROUNDING LAND USE

North: Water Street runs along the northern property boundary with a low-rise commercial office building and an Infiniti automobile dealership located ±125 feet across the street. A White Plains fire station and a municipal road maintenance facility also exist in the nearby northwestern vicinity. Distant properties within a ¼ mile to the north are improved with single family dwellings and low rise apartment buildings.

South: Main Street runs along the southern property boundary with the Westchester Financial Center office complex immediately beyond. The Galleria shopping mall exists to the southeast and a vacant lot exists to the southwest. Distant southern properties beyond the adjoining development are improved with apartment buildings, a public library and some commercial retail and office development.

East: Lexington Avenue runs along the eastern property boundary with several office buildings and a church and school immediately beyond. Properties to the east within a ¼ mile are improved with commercial office buildings and retail development. An Exxon gas station also exists approximately 1,200 feet to the east of the subject property.

West: Bank and Ferris Streets abut the eastern property boundary with a parking lot and a commuter garage for the adjoining Metro North railroad located ±300 feet to the west. Immediately beyond the railroad tracks is the Bronx River and some park land. Distant western properties located approximately ¼ mile away are improved with residential dwellings.

4.0 HISTORIC SITE CONDITIONS

The history of land use on or near the property was formulated from a review of Westchester County deed information, Sanborn maps, city directories, historical aerial photographs, and interviews.

4.1 CURRENT AND PRIOR OWNERSHIP

According to Mr. Mike Martino, the property manager, the current owner of the subject property is Connecticut General Life Insurance. In order to obtain information on previous owners, Dames & Moore reviewed copies of Westchester County deed records, which were provided by Commonwealth Land Title Insurance Company of White Plains. Deed records were reviewed as far back as the mid 1860s which indicated that the property was farmland and was ceded to the New York and Harlem Railroad company. Other names identified on property transfers consisted of the Lincoln Oil Company, which owned two parcels on the south side of Hamilton Avenue which is currently occupied by the Gateway Tower office building. These two parcels which were previously owned by the Lincoln Oil company were the gas station identified on aerial photographs and Sanborn maps which are described below. These two parcels were ceded to the White Plains Urban Renewal Agency (WPURA) in 1966. Other names which appeared on property transfer deeds included ECI Electronics Communications, Inc., Elmsford Drive-Inn Enterprises, and Brockway Sales & Service, Inc. which was also known as Interbrite Automobile Dealership. These companies all ceded ownership of the parcels to the WPURA from the early to late1960s. The previous property uses associated with the former property owners have the potential to create a Recognized Environmental Condition on the subject property.

4.2 AERIAL PHOTOGRAPHS

Historical aerial photography covering the site in 1943, 1961, 1977, and 1986 were included in the previous environmental assessment prepared by others. A synopsis of these photographs is presented below:

1943: A railroad terminal and associated buildings exist on the northern portion of the property where the garage/bus terminal and the asphalt paved parking lot exist.

1961: Several commercial structures have been constructed along Hamilton Avenue. In addition, adjoining properties to the north, west and east of the site have been improved with commercial or residential buildings.

1977: The railroad terminal has been razed and the northern portion of the property is now a parking lot. Commercial buildings still exist along Hamilton Avenue.

1986: The subject property and surrounding properties are primarily developed with the improvements that exist today.

4.3 SANBORN FIRE INSURANCE MAPS

Sanborn Fire insurance Maps were provided in the previous environmental assessments and were also reviewed at the White Plains Public Library. Maps for the years 1885, 1889, 1894, 1905, 1911, 1930, 1950, 1959, 1987 and 1995 were reviewed. A synopsis of the Sanborn Map review is presented below:

1885: The 1885 map shows the southern portion of the site (south of the existing New Street). The property is improved with dwellings, stables and several retail establishments along Main Street which is identified on the Sanborn map as Railroad Avenue. A railroad track exists to the west and the majority of surrounding properties are improved with dwellings, stables and single story retail stores.

1889: A lumber and coal storage yard exist on the northern portion of the property along with several dwellings. A lumber mill and storage yard also exist to the west on the opposite side of the train tracks. Little has changed on surrounding property development since 1885.

1894: There have been few changes on the subject property or surrounding property development since the 1889 Sanborn map.

1900: Several dwellings and stables have been constructed on the subject property since 1894. Distant properties to the north and northwest have also been improved with residential dwellings.

1905: The tracks and other improvements associated with the lumber and coal storage yard have been razed and the property has been re-developed with new railroad spurs and a new storage building. With this one exception, no other significant changes have occurred on the subject property or surrounding properties.

1911: A building occupied by the Standard Oil Company of New York has been constructed on the north side of the property along Water Street. A fire station has also been constructed on the subject property at the northeast corner of the intersection of Hamilton and Lexington Avenues. Several dwellings have also been constructed on the north side of Hamilton Avenue, and the south side of Water street on the extreme northeastern corner of the property.

1930: The previous improvements on the south side of the property along Main Street have been razed and redeveloped with commercial retail stores. A warehouse identified as a "feed store" has also been constructed on the north side of Hamilton Avenue and the fire department building has been expanded. A gasoline UST is also identified at the fire department building at northwest corner of Hamilton and Lexington Avenues. Two large aboveground oil tanks exist on the northwest corner of the subject property. Surrounding properties have undergone extensive commercial development and consist primarily of retail stores. A gas station with six gasoline USTs has been constructed immediately east of the subject property at the southeast corner of Lexington and Hamilton Avenues.

1950: Several dwellings along the south side of Hamilton Avenue have been razed and the area has been re-developed with a gas station and a warehouse. A beer warehouse has also been constructed on the north side of Hamilton Avenue, and the Westchester Asphalt plant now occupies the northwestern corner of the property. Fuel bulk storage tanks still exist on the northwestern portion of the site. The gas station identified on the 1930 Sanborn map to the east still exists. Little else has changed on surrounding property development since 1930.

1959: A gas station / auto repair facility has been constructed on the north side of Hamilton Avenue in the center of the block.

1987: Previous development identified on earlier Sanborn maps have been razed, and the subject property has been improved with the existing office building and parking garage. The central lot where the existing asphalt surface parking area exists appears to be undeveloped. Surrounding properties have been mostly improved with the existing commercial development.

1995: There have been no significant changes to the subject or surrounding properties since 1987.

4.4 HISTORIC CITY DIRECTORIES

Dames & Moore reviewed historic city directories for the Subject at the White Plains Public Library. Directories published by the R. L. Polk Company for the years 1937, 1947, 1956, 1961 and 1967 were reviewed. This review yielded the following significant information on previous property development:

1937: 45 Hamilton Avenue – Terminal Garage

65 Hamilton Avenue – Hamilton Service Station

82 Hamilton Avenue – Engine Company No. 2

26 Water Street – White Plain Coal, Feed and Asphalt Distribution

1947: 65 Hamilton Avenue – Star Service Station

79 Hamilton Avenue- Stockell & Son's Service Station

82 Hamilton Avenue – Engine Company No. 2

50 Water Street – Westchester Asphalt Distributors

46 Water Street – La Porta, John, Auto Repairs

1956: 45 Hamilton Avenue – Interbrite Corp. Auto Dealers

65 Hamilton Avenue – Star Service Station

76 Hamilton Avenue – White Plains Lumber Company

79 Hamilton Avenue- Stockell & Son's Service Station

82 Hamilton Avenue – Engine Company No. 2

63 Lexington Avenue – Bellmont Feed Company

45 Water Street – Golden Bros. Coal Distributors

1961: 79 Hamilton Avenue- Stockell & Son's Service Station

65 Hamilton Avenue – Star Service Station

76 Hamilton Avenue – White Plains General Auto Repair

82 Hamilton Avenue – Engine Company No. 2

1967: 76 Hamilton Avenue – White Plains General Auto Repair

43 Main Street – Cleaners & Dryers

45 Water Street – Hartsdale Coal & Oil Dealers

82 Hamilton Avenue – Engine Company No. 2

The above referenced city directories identified several gas stations in the central portion of the property along Hamilton Avenue and an establishment assumed to be a dry cleaners located in the southwestern portion of the site along Main Street. An asphalt, coal and oil distribution facility also used to exist on the northern portion of the property. This former commercial and industrial land usage of the subject property has the potential to create a Recognized Environmental Condition.

4.5 REVIEWED DOCUMENTS

Dames & Moore's review included two previous Phase I Environmental Assessment reports, two asbestos surveys, four previous Phase II Environmental Assessment reports, and one document review of the Subject. These reports are listed in Section 8.0 and are summarized below.

In October 1991, Environmental Science & Engineering (ESE) was retained to conduct soil sampling and analysis associated with the removal of a leaking 2,000 gallon UST. Due to constraints associated with the UST's proximity to the building and the existing 10,000 gallon fuel oil UST, soil sampling was conducted only around the top of the UST. This sampling and analysis detected Total Petroleum Hydrocarbons (TPH) at a concentration of 15,900 mg/kg or ppm, which ESE attributed to spillage during the excavation to uncover the tanks. Four other composite samples taken from the excavation pile had TPH concentrations ranging from 50 to 100 ppm (below action levels), which were used as backfill. The contaminated soil that resulted from a spill during the excavation was reportedly removed with shovels.

In 1991, BCM Engineers conducted a Phase I ESA on the garage and surface parking lot property which was combined with an ESA on an office building (Hamilton Plaza) located approximately 1,200 feet to the east. The BCM report identified that the parking garage and central parking lot were formally part of a railroad freight yard and were also improved with a fire station and a Sunoco gas station along Hamilton Avenue along the southern side of the central parking lot. An asbestos survey was also included in BCM's Phase I ESA and is discussed in Section 3.3. BCM recommended that a subsurface investigation be conducted at the parking garage and the the central parking lot to determine if the previous land usage had impacted the subject property.

In 1993 BCM Engineers conducted a magnetometer and a backhoe intrusive survey of central parking area which at the time was a vacant lot. The magnetometer and intrusive survey identified a former gasoline pump island on the south side of the central parking lot (associated with a former gas station), and an abandoned UST located at the southeast corner of the central parking lot which was associated with a former fire station. Four soil borings were advanced in the vicinity of the

UST and two monitoring wells were installed; one near the UST, and the other near the pump island. An additional two borings were also advanced in pits on the central parking lot that contained construction debris. Soil samples taken in the vicinity of the UST (8-12 feet bgs) did not reveal the presence of any contaminants that the samples were analyzed for. Polynuclear Aromatic Hydrocarbon (PAH) contamination was identificd in the soils within the construction debris pits. Laboratory analysis of groundwater samples from the two wells for VOCs, SVOCs, and MTBE did not identify any contaminants above regulatory guidelines.

The 1993 BCM survey also included a sub-surface investigation at the parking garage. Six soil borings were advanced through the floor of the garage and one monitoring well was installed. PAHs were identified in the underlying soil. Laboratory analysis of the groundwater sample from the well for VOCs, SVOCs, and MTBE did not identify any contaminants above regulatory guidelines. BCM concluded that the contaminants found were consistent with the prior industrial usage of the subject property.

In May 1995, Camp Dresser & McKee prepared a report describing the removal of the UST identified by BCM as well as associated soils in the UST grave (at the southeast corner of the central parking lot) and the former pump island debris associated with a former gas station on the south side of the central parking lot. Approximately 106 tons of petroleum contaminated soil were removed from the site. Testing of the tank grave walls and bottom after the UST removal and soil excavation indicated that all petroleum contaminated soil had been removed.

A 1995 Malcolm Pirnie investigation consisted of advancing 20 soil borings on the vacant lot (now the surface parking lot). The sampling program divided the site into three areas based on topography and former land usage. Each area had either six or seven borings advanced. Sample aliquots were taken from various horizons at two foot intervals ranging from the surface to a maximum depth of 12 feet below ground surface (bgs). The majority of borings were only advanced to a depth of 8 feet bgs. Soils were analyzed for 23 heavy metals, Total Petroleum Hydrocarbons, (TPH), Polynuclear Aromatic Hydrocarbons (PAHs), and PCBs. Each horizon (i.e. 2-4 feet) in

every sample location was combined into one composite sample for laboratory analysis, resulting in a total of 13 samples.

Analytical testing results identified PAH contamination above New York State Department of Environmental Conservation (NYSDEC) cleanup guidelines in various horizons at different concentrations. Malcolm Pirnie indicated that the soil could remain onsite during future development (as a parking lot) but special care and health & safety issues would need to be addressed prior to construction activities.

A Phase I ESA on the subject prepared by Environmental Risk Limited (ERL), in September 1999 included a synopsis of the previous investigations as well as conducting a Phase I ESA on the 20-story office tower. ERL identified that contaminated soils were likely left in place during construction of the asphalt parking area in 1995-1996. In addition, two gas stations were identified on the north side of the tower parcel along Hamilton Avenue, prior to the construction of the existing office building. ERL's investigation also included an asbestos survey performed by Leadsafe in July 1999 on the office building and is discussed in Section 3.3 of this report.

ERL prepared an Environmental Summary Letter, dated November 18, 1999 for the subject property which included the results of additional subsurface investigative sampling and analysis. In August 1999, four soil borings were advanced to a depth of approximately 10 feet below grade at the active and closed-in-place USTs on the southwest corner of the property. Analytical testing of the soil samples indicated low levels of petroleum contamination (under 100 ppm TPH). ERL concluded that the petroleum levels were typical to urban areas and that no petroleum was released from the USTs. ERL also installed two additional monitoring wells at the central parking lot (previous wells installed by BCM were destroyed during the parking lot's development in 1995-1996). Groundwater sampling and analysis of these wells plus the BCM installed well at the parking garage did not indicate the presence of MTBE, Benzene, Toluene, Ethylbenzene of Xlyenes which are typically associated with gasoline contamination. ERL concluded that residual groundwater contamination

from the former gas station (on the north side of Hamilton Avenue) did not appear to be present, and the USTs on the southwest corner of the office building did not impact soils.

A Document Review, prepared by ERL on November 30, 1999 was also reviewed. This letter report indicated that representatives from ERL met with White Plains city officials to determine the locations of the two previous gas stations on the south side of Hamilton Avenue. The gas stations were located approximately 60 feet, and 190 feet west of the intersection with Lexington Avenue. White Plains city officials stated that the gas stations were located on the present site of Hamilton Avenue since the street was widened to the south to its present configuration. In addition, White Plains city representatives stated that the USTs were removed. Meetings with Gateway's chief engineer, Bob Melley, and the White Plains Fire Captain, Mr. Mark Daman confirmed that the 2,000 gallon UST was closed-in-place and filled with a sand/slurry mixture on November 20, 1991.

4.6 INTERVIEWS

Mr. Mike Martino, Property Manager, and Mr. Bob Melley, Chief Engineer, of Alan B. Ashforth, Inc., provided information regarding tenant operations at the subject property. Neither of these individuals knew of any current occupants of the subject property that would have generated or handled hazardous wastes; nor were they aware of any hazardous materials incidents on or near the subject property.

5.0 REGULATORY AGENCY INVESTIGATION

5.1 ENVIRONMENTAL DATABASES REVIEW

Dames & Moore reviewed information gathered from several environmental databases through VISTA Information Solutions, Inc. (VISTA) to determine if activities on or near the subject property would potentially threaten the environmental quality of the subject property. VISTA reviews databases compiled by Federal, state, and local governmental agencies. The complete list of databases reviewed by VISTA is provided in VISTA's report, which is included in Appendix D. It should be noted that this information is reported as Dames & Moore received it from VISTA, which in turn reports information as it is provided in various government databases. It is not possible for either Dames & Moore or VISTA to verify the accuracy or completeness of information contained in these databases. However, the use of and reliance on this information is a generally accepted practice in the conduct of environmental due diligence. The databases searched and the information obtained is summarized below.

Type of Database/Date	Description of Database/Effective Date	Radius Searched	Number of Sites Identified
NPL	The National Priorities List identifies uncontrolled or abandoned hazardous waste sites. To appear on the NPL, sites must have met or surpassed a predetermined hazard ranking system score, been chosen as a state's top priority site, pose a significant health or environmental threat, or be a site where the EPA has determined that remedial action is more cost-effective than removal action. Effective Date – 9/99	1 mile	0
CERCLIS	The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment. Effective Date – 8/99	0.5 miles	0

RCRA TSDs	Resource Conservation & Recovery Act treatment, storage, or disposal sites Effective Date – 8/99	0.5 mile	0
CORRACTS	RCRA TSD facilities ordered to implement corrective actions Effective Date – 8/99	1 mile	0
RCRA Generators	RCRA-regulated hazardous waste generator notifiers list; both Large and Small Quantity Generators are included in this list Effective Date – 8/99	0.125 mile	7
SPILLS	EPA's Emergency Response Notification System (ERNS) list contains reported spill records of oil and hazardous substances Effective Date – 8/99	0.125 mile	9
RCRA VIOL.	EPAs RCRA Program list of hazardous waste generators, storage, transportation, treatment and disposal facilities which have been cited for RCRA violations at least once since 1980. Effective Date – 8/99	0.125 mile	0
SWLF	State inventory of solid waste disposal and landfill sites Effective Date – 6/99	0.5 miles	0
LUST	List of information pertaining to all reported leaking underground storage tanks Effective Date – 7/99	0.5 miles	61
UST	State underground storage tank sites listing Effective Date – 7/99	0.25 mile	14

Distances and directions based on actual field observations.

The subject property was listed in the environmental database five times. Two Leaking Underground Storage Tank (LUST) listings were for the office tower's 2,000 gallon closed-in-place UST; One UST listing is for the 10,000 gallon and 2,000 USTs on the office tower parcel, and two RCRA hazardous waste generators for former occupants of the building and subject property. These listings are discussed in the following sections.

The EPA's National Priorities List (NPL) of uncontrolled or abandoned hazardous waste sites was reviewed for sites within one mile of the subject property. To appear on the NPL, sites must have met or surpassed a predetermined hazard ranking system score, been chosen as a state's top priority site, pose a significant health or environmental threat, or be a site where the EPA has determined that remedial action is more cost-effective than removal action. The database search identified no NPL sites within one mile of the subject property.

The EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) listings were reviewed to determine if sites within one-half mile of the subject property are listed for investigation. The CERCLIS database identifies hazardous waste sites that require investigation and possible remedial action to mitigate potential negative impacts on human health or the environment. The database search identified no CERCLIS sites within one-half mile of the subject property.

The current RCRA Notifiers List was reviewed to determine if RCRA treatment, storage, or disposal sites (TSDs) are within one mile of the subject property. The database search identified no RCRA TSD facilities within one mile of the subject property.

The RCRA-Corrective Action Sites (CORRACTS) list was reviewed to determine if RCRA generator facilities that have had corrective actions imposed are located within one mile of the subject property. The database search identified no CORRACTS within one mile of the subject property.

The RCRA-regulated hazardous waste generator notifiers list was reviewed to determine if RCRA generator facilities are located within 0.125 mile of the subject property. The database search identified seven (7) RCRA waste generators (SQG) within 0.125 mile of the subject property, of which, two are located on the subject property. The facilities are discussed below.

One listing at the subject property is for ATT, a RCRA small quantity hazardous waste generator. ATT is no longer a tenant at the subject property and its presence is not expected to create a Recognized Environmental Condition. The second listing for the Subject, is a RCRA large quantity

hazardous waste generator (LQG) identified as "White Plains General Auto Rep" located at 76 Hamilton Ave. This facility is believed to have been one of the auto repair/gas stations previously located on the north side of the office tower and was removed circa 1967-1968 when Hamilton Avenue was widened. This facility had the potential to impact the subject property with petroleum products and chlorinated solvents. Due to the nature of activities and the limited environmental testing on the office tower parcel, the RCRA LGQ (White Plains General Auto Repair) has the potential to create a Recognized Environmental Condition on the subject property. The remaining four RCRA generators are not located on adjoining properties, and based on the lack of reported releases and the small quantities of waste generated, it is unlikely that these SQGs have created a Recognized Environmental Condition on the subject property.

A database search of the EPA's Emergency Response Notification System (ERNS) list, which contains reported spill records of oil and hazardous substances, did not identify the subject property as an ERNS site. The database identified nine (9) ERNS sites within 0.125 mile of the subject property.

Seven of the nine above listed ERNS facilities have been granted a "Closed" status from the NYSDEC which indicates that the spills have not severely impacted the environment. One spill of transformer fluid at 9 New Street, immediately east of the Subject was "Open" and the Vista report indicates that the responsible party was Con Edison, the local electric utility provider. The Vista report also indicated that contaminated soil was removed. Inasmuch as groundwater was not identified as impacted, it is unlikely that this spill incident has impacted the Subject.

The other facility which has an Open classification is an office building located at 170 Hamilton Avenue, approximately 600 feet east of the Subject. The Vista Report indicated that gasoline from a spill has impacted groundwater, and the NYSDEC was investigating the matter. This facility is a potential upgradient source of groundwater contamination that may impact the subject property.

The New York State Department of Environmental Conservation (NYSDEC), provides information on hazardous waste sites within their jurisdiction. The database search identified no State Equivalent CERCLIS List (SCL) sites within 0.5 mile of the subject property.

The NYSDEC inventory of solid waste disposal and landfill sites (SWLF) was reviewed to determine if SWLF sites are in the vicinity of the subject property. The database search identified no SWLF sites within 0.5 mile of the subject property.

The NYSDEC inventory of leaking underground storage tanks (LUST) was reviewed to determine if there are LUST sites in the vicinity of the subject property. The database search identified 61 LUST sites within 0.5 mile of the subject property.

The Subject property was identified as two (2) separate LUST incidents which have all been given a closed classification. These LUST incidents appear to be associated with the closing of the 2,000 gallon fuel oil UST.

Out of the remaining 59 LUST sites within the ½ mile search radius, 45 have been granted "Case Closed" classifications, which indicates that the facilities are not a significant threat to human health or the environment. The closest LUST site with an "Open" classification is a facility located at 47 Park Avenue, approximately 0.25 mile to the northeast and upgradient. Fuel oil at this facility has contaminated groundwater. An Exxon gas station LUST site with a "Closed" classification also exists approximately 0.20 mile east and upgradient from the subject. These two facilities may have the potential to create a Recognized Environmental Condition on the Subject property.

The remaining Open LUST sites are either located to the west of the Bronx River (a hydrogeoligic barrier), crossgradient from the subject property, or are greater than ¼ mile away from the subject property. Based on their distances and likely hydrogeologically crossgradient location, it is unlikely that these LUST sites have created a Recognized Environmental Condition on the subject property

Fourteen (14) registered Underground Storage Tank (UST) facilities were identified within a ¼ mile radius of the Subject. One UST listing is for the 10,000 gallon and 2,000 USTs on the subject's

office tower parcel. Based upon our review of building records, the Subject's 10,000 gallon fuel oil UST is properly registered as Facility number 3-496871. This registration will expire on September 23, 2003.

Only one of the remaining 13 listings was located on an adjoining property which is the office building to the east at 123 Main Street which has a ±9,400 gallon and a ±2,000 gallon fuel oil USTs. This facility was also included on the LUST database for failing UST tightness tests in October 1989. However, the Vista report indicated that subsequent re-testing of the USTs when the supply line piping was isolated from the systems indicated that the tanks were tight, and the LUST incident was given a "Closed" status.

Three UST facilities within the ¼ mile search radius were also included on the LUST database. Only one of these facilities, Pepe Motors at 50 South Bank Street located approximately 0.15 mile south has an Open LUST classification. All three sites appear to be located hydrogeologically downgradient from the subject, in which groundwater would flow to the west-southwest towards the Bronx River and away from the Subject. As such these LUST/UST facilities are not expected to create a Recognized Environmental Condition on the subject property.

Dames & Moore reviewed the Orphan List Sites, which are sites that have not been geocoded based on lack of sufficient data regarding their exact location within the general area. The review of the Orphan List Sites did not identify properties that are likely to have created a Recognized Environmental Condition on the subject property.

5.2 REGULATORY AGENCY CONTACT

Written inquiries were submitted by Dames & Moore to the Westchester County Health Department, the NYSDEC and the White Plains Fire Department regarding the subject property. At the time this report was prepared, responses have not been received from the either department. Correspondence with regulatory agencies is provided as Appendix E.

6.0 CONCLUSIONS

Dames & Moore conducted a Phase I Environmental Assessment of the Gateway Office Complex in White Plains, Westchester County, New York ("subject property") to evaluate the potential for a Recognized Environmental Condition to exist on the subject property from onsite or offsite activities. Dames & Moore's conclusions are presented below.

6.1 ON-SITE RECOGNIZED ENVIRONMENTAL CONDITIONS

Based on Dames & Moore's review of available information, the following may have created a Recognized Environmental Condition.

- The active and closed-in-place USTs on the southwest corner of the office tower parcel have impacted the office tower parcel.
- Former petroleum USTs and automotive repair operations conducted on the north side of the office tower parcel.
- A previous retail facility identified as "Cleaning & Drying" used to exist on the office tower parcel in the 1960s. This facility appears to have been a dry cleaners, and it is unknown if spills or releases associated with the former land usage has impacted the subject property.
- The previous railroad storage yard, asphalt plant and lumber yard that used to exist on the parking garage and central parking area parcels has impacted the soils of this portion of the subject property. PAH contaminated soil has been identified; however, the impact to groundwater by PAHs have not been evaluated.

6.2 OFF-SITE RECOGNIZED ENVIRONMENTAL CONDITIONS

Based on Dames & Moore's review of available information, the following offsite sources were identified as having a potential to create a Recognized Environmental Condition on the subject property:

- The previous gas station located immediately east of the subject at the corner of Lexington & Hamilton Avenues is a potential source of off-site contamination.

- An Exxon LUST site located ±0.20 mile to the east and upgradient from the subject, as well as another open LUST facility located ±0.25 mile to the northeast are potential sources of groundwater contamination.

7.0 RECOMMENDATIONS

Based on the results of the Phase I Environmental Site Assessment of the subject property, the following recommendation appears to be warranted:

Based on the review of prior studies and the results of the Phase I Environmental Site Assessment of the subject property, further investigation and actions are warranted. Dames & Moore recommends that a comprehensive subsurface investigation be conducted in order to determine if the previous gas stations identified on the south side of Hamilton Avenue and the suspected former dry cleaners have impacted soil and groundwater quality. The investigation should also address the former leaking 2,000-gallon UST at the southwest corner of the property in order to determine whether or not soils under the base of the tank and groundwater have been impacted from the tank. Groundwater flow direction, which has been contradicted by previous consultants should also be determined in the sub-surface investigation. In addition, it is recommended that the 10,000-gallon #2 fuel UST that serves the emergency generator and boilers, be upgraded to include spill and overfill prevention in order to be in compliance with Federal and State UST regulations.

American Society for Testing and Materials (ASTM). Standard E1527-97, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," 1997.

U.S. Geological Survey, 7½-Minute Topographic Map, *White Plains, NY* Quadrangle, 1967

VISTA Information Solutions, Inc. (VISTA), Site Assessment Report, One North Lexington Avenue, White Plains, NY 10601, December 1, 1999.

Environmental Assessment for Hamilton Plaza and Gateway garage Bus Terminal (Asbestos Sampling excepts from a report), prepared by BCM Engineers for Prudential Mortgage Company, dated April 1991

Soil Quality Investigation, JMB Properties Company, White Plains, NY, prepared by Environmental Science & Engineering, dated October 14, 1991

Phase II Environmental Assessment, Gateway Garage/Vacant Lot, Hamilton and N. Lexington Avenues, White Plains, New York, prepared by BCM Engineers on behalf of Prudential Mortgage Capital, dated February 1993.

UST and Debris Removal Report, Gateway Garage, Vacant Lot, prepared by Camp Dresser & McKee, on behalf of the Prudential Realty Group, dated May 1995.

Additional Phase II Sampling, Gateway Garage/Vacant Lot, prepared by Malcolm Pirnie on behalf of Cigna Investment Management, dated May 1995.

Asbestos Assessment at One North Lexington Avenue, White Plains, New York, prepared by Leadsafe, Inc. on behalf of ERL, dated July 7, 1999.

Phase I Environmental Assessment, Gateway Office Building and Two Adjacent Parking Properties, North Lexington Avenue, White Plains, New York, prepared by Environmental Risk Limited on behalf of Cigna Investments, Inc., dated September 1999.

Document Review, Gateway Office Building and two adjacent parking lots, prepared by ERL, on behalf of Cigna Investments, dated November 30, 1999

Interviews:

Mike Martino, Property Manager & Bob Melley, Chief Engineer, Gateway Office Complex

Steven Parisio, NYSDEC Solid Waste Division