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PHASE I ENVIRONMENTAL SITE ASSESSMENT

***KATZ PROPERTY, BREWERTON ROAD
TOWN OF CICERO, ONONDAGA COUNTY, NEW YORK***

18 OCTOBER 1996

Prepared for:

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EXECUTIVE SUMMARY

A Phase 1 Environmental Site Assessment was performed by Adirondack Environmental Services, Inc. (AES) for Plymouth Development Corporation (PDR) at a site referred to as the Katz property on Route 11 (Brewerton Road), Cicero, New York. Three buildings are located on this property as follows:

7980 Brewerton Road - The Sports Page Bar and Restaurant

7982 Brewerton Road - Berco Auto Repair; and

7984 Brewerton Road - North Star Cleaners

The Phase 1 assessment included a site visit and walk-over, review of historic ownership, regulatory review, evaluation of subject and surrounding properties, and interviews. The buildings present at 7980, 7982, and 7984 were not entered as part of the Phase 1.

Records review indicate that there are no registered aboveground or underground storage tanks on the property. The effects of neighboring property on the subject property are expected to be minimal. The site review did indicate that minor oil staining exist on the property near a dumpster behind 7980 Brewerton Road and near the southern property line next to the Valvoline facility.

Of particular interest are the vent pipes, blowdown pipes and outside drum storage associated with the dry cleaning operation at 7984 Brewerton Road. Visual and olfactory evidence suggests that a release of dry cleaning solvents may have occurred at the location.

AES recommends obtaining access to site buildings to evaluate the potential presence of asbestos containing materials, floor drains, improper storage of chemicals or other features that could present a concern. Soil and groundwater sampling at 7984 Brewerton Road is recommended to determine the extent of affected soil and ground water (if any) associated with the suspected release.

INTRODUCTION

Adirondack Environmental Services, Inc. (AES) was retained by Plymouth Development Corporation (PDC) to conduct a Phase I Environmental Site Assessment of the subject property, which is referred to as the Katz property and is at the location of 7980, 7982, and 7984, Brewerton Road (Route 11) in the Town of Cicero, Onondaga County, New York. Figure 1-1 is a site locator map showing the site location and the surrounding area.

The properties investigated in this Phase I site assessment are bordered on the north, south and west by other commercial properties and on the east by an undeveloped open field. The business immediately north of the site is a Midas Muffler automobile repair shop, a Valvoline Instant Oil Change business is immediately south of the site.

The Environmental Assessment was conducted to evaluate if environmental conditions exist at the property that could restrict utilization of the property or represent grounds for environmental liability, and included performance of the tasks listed below.

Historical Ownership and Use Review

AES reviewed available historical information of past and present property ownership or use to evaluate the potential that historical utilization of the property may have resulted in adverse environmental impact.

Regulatory Review

AES conducted a detailed regulatory review by contacting applicable federal, state and local agencies to identify environmental related regulatory requirements and compliance records for the property, known or suspected hazardous material disposal or storage issues, recorded spills, discharges or other incidents of

environmental concern known to have occurred at, or within a reasonable distance of, the subject property.

Physical Property Evaluation

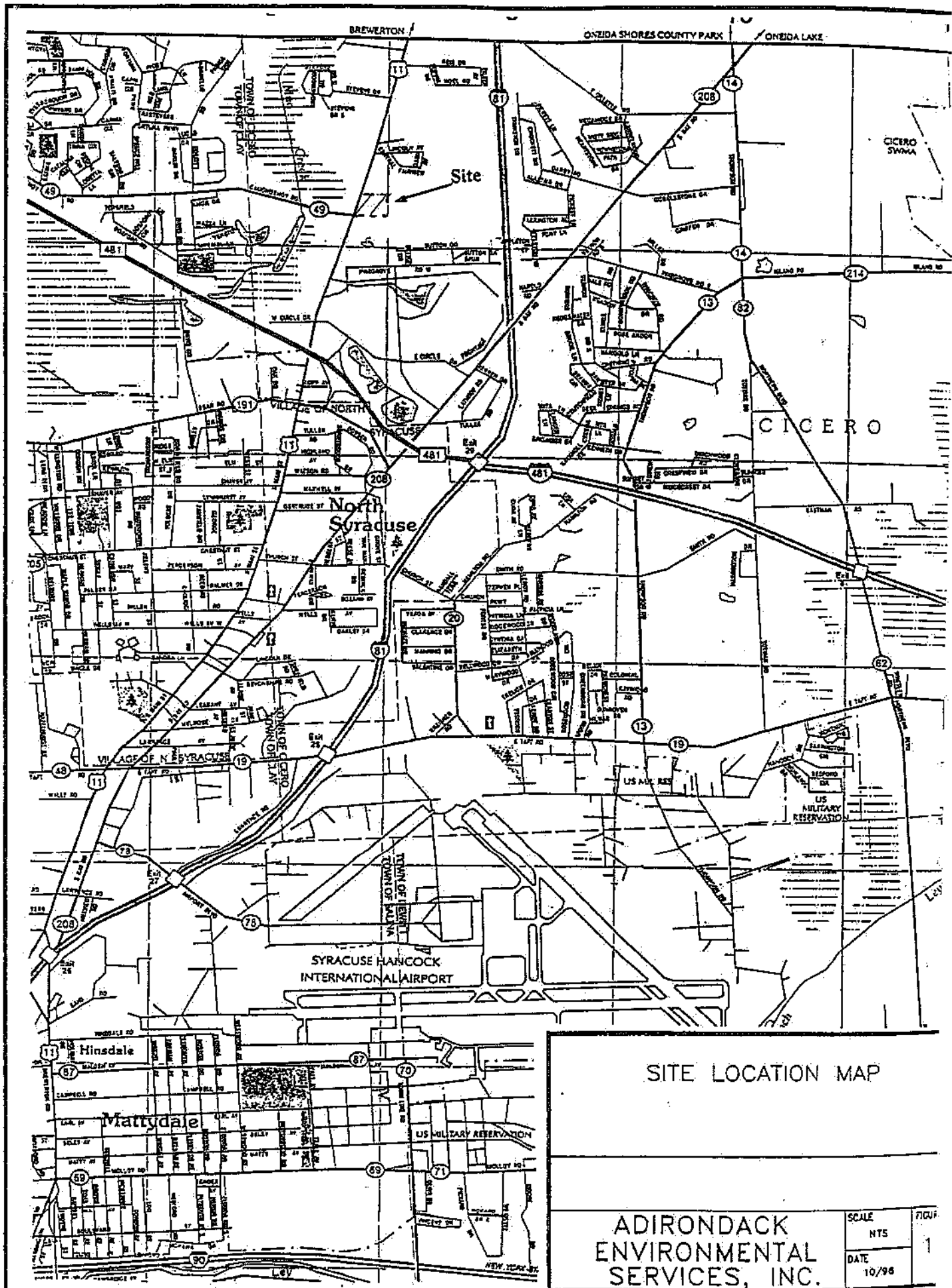
AES performed an evaluation of the property by walking the site and viewing adjacent properties. The evaluation was conducted to identify the presence of visual signs of contamination, storage tanks, polychlorinated biphenyls (PCBs), asbestos, discharges, emissions or other condition of environmental concern. It should be noted that access to the site was not given so none of the site buildings were entered as part of the scope of this evaluation.

Review of Surrounding Property

As part of the assessment, AES attempted to identify adjacent operations or facilities that could have a negative environmental impact on the subject property. Additionally, when conducting the regulatory agency review task, AES requested information regarding the surrounding property to determine if there were documented or suspected hazardous waste disposal sites, hazardous material releases or other environmental conditions of concern within a one-mile radius of the subject property. AES also attempted to identify sensitive environmental areas (such as surface water bodies and floodplains) either on or adjacent to the property.

Asbestos-Containing Building Materials

Sampling was not conducted as part of this Phase I assessment; therefore, it is not known if any asbestos-containing building materials are present in any of the site buildings. However, potential asbestos containing material (ACM) that is exposed and available for visual evaluation will be noted during the follow-up site inspection.



SITE LOCATION MAP

ADIRONDACK
ENVIRONMENTAL
SERVICES, INC.

SCALE	NTS	FIGURE
DATE	10/96	
		1

2.0 ***LIMITATIONS, SCOPE, AND METHODS***

2.1 ***PURPOSE***

The Phase I Environmental Site Assessment (ESA) of the property located at 7954 Brewerton Road was performed to be consistent with the ASTM Standard E-1527-94: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, and to constitute appropriate inquiry for the purpose of CERCLA's (the federal Comprehensive Environmental Response, Compensation and Liability Act) innocent landowner defense.

The purpose of a Phase I ESA is to attempt identification of recognized environmental conditions in connection with a property. ASTM defines a 'recognized environmental condition' as the presence or likely presence of a hazardous substance or petroleum product on a property under conditions that indicate an existing release, a past release, or a material threat of a release into structures on the property or into the ground, groundwater or surface waters of the property. It is not intended to cover *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 enforcement actions if brought to the attention of appropriate government agencies.

2.2 ***SPECIAL TERMS AND CONDITIONS***

The Scope of Work performed was based on the Standard Practice for Environmental Site Assessments ASTM Standard E-1527-94, and was performed in a manner consistent with generally accepted practices of the industry.

2.3 ***LIMITATIONS AND EXCEPTIONS***

Scope of Activity

This report is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based on the facts currently available within the limits of the existing data, scope of work, budget and schedule. To the extent that more definitive conclusions are desired by the client than are warranted by the currently available facts, it is specifically AES's intent that the conclusions and recommendations stated herein will be intended as guidance and not necessarily a firm course of action except where explicitly stated as such. We make no warranties, express or implied, including, without limitation warranties as to merchantability or fitness of the property for a particular purpose. In addition, the information provided to you in this report is not to be construed as legal advice.

Limitations of Use of This Report

The environmental assessment was performed for Plymouth Development Corporation in accordance with the 3 October 1996 proposal accepted by Plymouth Development Corporation. Client acknowledges that this report has been prepared for use by the client and agrees that AES reports or correspondences will not be used or relied upon in any prospectus or offering circular related to an initial public offering.

2.4

SCOPE

The Phase I ESA of the subject property in Cicero involved four overall components: records review, site reconnaissance, interviews, and preparation of the report.

During the course of the ESA, the following information sources were accessed for the site:

- Federal and state environmental records:

<u>Listing</u>	<u>Title and Contents</u>	<u>Radius</u>
CERCLIS	Comprehensive Environmental Response Compensation, and Liability Information System hazardous waste sites	0.5 mi.
ERNS	Emergency Response Notification System reported spills	0.5 mi.
NPL	National Priorities List hazardous waste sites	1.0 mi.
RCRIS	Resource Conservation and Recovery Information System hazardous waste generators, transporters and treatment/storage/disposal facilities	0.25 mi.
LRST	New York Leaking Registered Storage Tanks	0.5 mi.
HWS	New York Inactive Hazardous Waste Disposal Sites	1.0 mi.
SWF	New York Active Solid Waste Facility Register	0.5 mi.
CBS	New York Chemical Bulk Storage Tanks (registered tanks)	0.25 mi.
MOSF	New York Major Oil Storage Facilities (registered facilities)	0.25 mi.
PBS	New York Petroleum Bulk Storage Tanks (registered tanks)	0.25 mi.
NFRAP	No Further Remedial Action Planned Sites (CERCLIS Archive)	0.5 mi.

- USDA Soil Conservation Service - for historical aerial photographs of the site and information on soils at the property;
- Floodplains map - for floodplains on or adjacent to the property

- Interviews with representatives of state and local government agencies including the New York State Department of Environmental Conservation (NYSDEC) and the Town of Cicero Assessors Office - for environmental information on the subject property and adjacent parcels;
- Interviews with individuals with relevant knowledge about the subject property or surrounding properties; and
- Site review for evidence of spills, dumping, drains, wells, bulk storage tanks, drums, containers, fill materials, asbestos-containing materials, and other potential sources of contamination.

2.5

METHODOLOGY

Site Reconnaissance

The site visit was conducted on 4 October 1996 by Ms. Suzanne Wheatcraft. Mr. Al Piraino, long-time manager of the nearby golf course, was present during the site visit and was interviewed regarding the subject and surrounding properties. Observations of the site from the adjacent property were made, and the site visit was photographically documented. The subject property and associated buildings were not available for on-site evaluation at that time; therefore, a follow-up visit was scheduled.

The inspection included observation and evaluation of evidence of spills and/or contamination, on-site dumping, wells, bulk storage tanks, drums, containers and fill materials. The site was visually inspected for evidence of pole-mounted or exterior pad mounted polychlorinated biphenyl (PCB) containing transformers and other contaminants.

The site was evaluated for potential negative environmental impacts, past and present, that could be determined by viewing it from the perimeter of the property. This included visual inspection, to the extent possible, for obvious indications of

negative environmental practices (e.g., spills, dumping, contamination, tanks) and identification of surface drainage patterns, as visible from the adjacent property.

Agency Information Requests

State and local government and agency personnel were contacted for information regarding potential environmental concerns on or near the subject property.

Records Review

AES conducted an environmental database search for the site and reviewed historic property use information from available data sources such as assessors records and aerial photographs.

A regulatory database service, Environmental Risk Information and Imaging Services (ERIIS), was retained to provide information on available state and federal environmental records of the subject property and other properties within specified distances (based on ASTM guidelines) of the site. AES performed a detailed review of the ERIIS report.

SITE DESCRIPTION

The subject property is located at 7980, 7982, and 7984 on Brewerton Road, in the Town of Cicero, Onondaga County, New York. The property investigated is reported to be approximately two acres in size.

The subject property is comprised of the following:

- 7980 - The Sports Page Bar & Restaurant is a two-story frame house that is operated as a bar and restaurant. It could not be visually determined if this building has a basement. Most of the parking lot in front and behind the building is unpaved or old, broken up pavement.
- 7982 - Berco Auto Repair. This metal building does not appear to have a basement and is paved up to the garage doors on the north side.
- 7984 - North Star Cleaners & Laundry is a one-story block building with a paved parking lot surrounding it to the north, east and west. It could not be determined if the building was constructed with a basement.

The site is in an area of mixed retail and other commercial use as well as some undeveloped and residential parcels. Wastewater is handled by Onondaga County Sewer Authority, potable water is supplied to the site by the Onondaga County Water Authority, and electricity and gas service is provided by Niagara Mohawk Power Corporation (NiMo).

RECORDS REVIEW**SITE HISTORY**

The history of the subject property was researched by reviewing files in the Town of Cicero assessors office and aerial photographs, and interviewing Mr. Al Piraino, manager of the adjacent golf course.

The Sports Page, Berco Auto Repair, and North Star Cleaners & Laundry are treated as one parcel by the assessors office and exact locations of any former buildings cannot be determined through air photo or assessors file review.

Records show that there were two houses at the site of the Sports Page in 1958; they were subsequently torn down in 1965. In 1996 records, the previous usage of Berco was that of a swimming pool sales office and storage building. There also may have been a car wash on the site at one time at the present North Star Cleaners location. Mr. Piraino confirmed that the car repair facility had been a swimming pool sales business, and that the dry cleaners had moved to the site from a location across the street and 0.25 miles north of the site sometime in the last five to seven years. Prior to that, the North Star Cleaners building had been used by a florist.

Site deed information was not provided by the client as of the writing of this report. It is not anticipated that it will show substantial additional information than that provided by individuals interviewed and the assessors office information.

FEDERAL AND STATE ENVIRONMENTAL LISTINGS

AES viewed the Comprehensive Environmental Response Compensation Liability Information List (CERCLIS) for a one-half mile radius of the property. The list is a comprehensive summary of all property for which allegation (discovery) has been made to agencies. AES also reviewed the National Priority List (NPL) which lists those sites on the CERCLIS listing for which a public health concern exists.

made to agencies. AES also reviewed the National Priority List (NPL) which lists those sites on the CERCLIS listing for which a public health concern exists.

A review of the NPL list indicates that there are no NPL sites within a one-mile radius of the subject property. A review of the CERCLIS list indicates that there are no CERCLIS sites within a one-half mile radius of the subject property.

The North Star Cleaners & Laundry is listed as a RCRIS large quantity generator (LQG) of hazardous waste and there are four RCRIS small quantity generators (SQG) identified within one-quarter mile of the subject property on the federal RCRIS database. Two of the four entries refer to the Valvoline site, under its current name and when it was a Jiffy Lube facility. The other two facilities are the Cady Brothers Garage north of the site (not adjacent to the site) and the Hess Gasoline Station located directly across the street from the site to the west. There are no penalties or violations for any of these RCRIS sites listed in the ERIIS record. Furthermore, the presence of a site on the RCRIS database does not necessarily pose an environmental threat to the subject property.

AES performed a review of the New York State hazardous waste site database. This database lists sites that New York State Department of Environmental Conservation (NYSDEC) has determined to be hazardous waste sites. There are no New York State hazardous waste sites within one mile of the subject property.

There are no reported registered aboveground storage tanks (AST) and no registered underground storage tanks (USTs) within one-quarter mile of the subject property with the exception of petroleum storage tanks. There are no reported leaking underground storage tanks (LUSTs) reported on the database within one-half mile of the subject property.

The following three petroleum bulk storage facilities (PBS) were located in the site vicinity; the Valvoline facility adjacent to the site, the Cady Brothers Service Station north of the site, and the Hess Station just west of the site. Information

from the ERIIS record shows the following tank records. The Valvoline facility maintains four above ground carbon steel tanks: a 300-gallon tank and three 2000-gallon tanks. Their contents is listed as lube oil and the site is listed as active. The Cady Brothers Service Station reportedly removed two underground carbon steel tanks in 1983, and the site is currently listed as inactive (from the standpoint of PBS issues). The Hess Station shows three underground tanks were originally installed in 1975, and closed prior to 1991. Currently, records show there are four 1000-gallon underground tanks in place which were installed in 1987. Three of these fiberglass reinforced plastic tanks contain unleaded gasoline, the fourth contains diesel.

Those sites listed in the ERIIS report as "unplottable" have been evaluated and the following have been found to be within a one-mile radius of the site:

- Pep Boys - 7885 Brewerton Road, RCRIS SQG, approximately one mile to the north;
- The Town of Cicero Offices - 8236 Brewerton Road, RCRIS SQG and PBS, approximately one mile to the north; and
- Donaghue Dodge - Rt. 11 (Brewerton Road) and Pine Grove Road, RCRIS LQG, approximately three-fourths mile to the south.

NYSDEC spills files were also reviewed for the site vicinity. There were no records of spills on the subject site. Spills were recorded for the following sites within a mile of the subject property:

- 8141 Brewerton Road - Jim Brown/Clayville Construction is north of the site less than one-half mile;
- 8058 Brewerton Road - Whites Auto Supply is north of the site less than one-half mile;
- 8024 Brewerton Road - Cady Brothers is north of the site less than one-quarter mile; and
- 7916 Brewerton Road - Hess Station is adjacent to the site to the west.

SITE GEOLOGY AND NATURAL RESOURCES MAPPING

A review of the 1979 National Flood Insurance Rate Map (FIRM) for the Town of Cicero indicated that the subject property is not located in an identified 100-year flood plain. The site is relatively flat and mostly paved. Surface water drainage is primarily by sheet flow and as controlled by storm drains along Route 11.

Information from the county soil survey indicates that ground water in this area of the county is within five feet of the ground surface most of the year. Based on regional topography and surface water flow, it appears that site groundwater flows to the northwest.

A review of available physiographic, topographic and geologic information indicates the natural topography and surficial geology of the Town of Cicero (northern part of Onondaga County) area is part of the Erie-Ontario Plain. It has typical lake-plain topography. Overburden sediments consist primarily of lacustrine silts and clays deposited in proglacial lakes. The topographic map identified the elevation of the subject property to be approximately 390 ft.

Local surface water drainage appears to be northwest into Mud Creek. All of the surficial drainage from Onondaga County eventually flows into Lake Ontario.

Bedrock from which the soil material in Onondaga County derived is mostly limestone, siltstone, and shale that formed from materials deposited at the bottom of the sea during Silurian and Devonian geologic periods. Bedrock strata under the Erie-Ontario Plain and the Allegheny Plateau occur in the east-west bands having a regional dip southward about 1 degree, or a drop in elevation of 20 to 30 feet to the mile.

5.0 SITE RECONNAISSANCE AND INTERVIEWS

5.1 INTERVIEWS

AES interviewed Mr. Al Piraino, manager of the nearby golf course and long-time resident of the area, in researching site-specific information on the subject property and adjacent properties. Files were also reviewed at the offices of the Town of Cicero Assessor, and at the office of Mr. Dan Lasalle of NYSDEC Petroleum Spills Group.

5.2 SITE RECONNAISSANCE

Site Drainage

Site observations and the topographic map for the area indicate that drainage from the site overall is to the northwest, towards Mud Creek. The overall regional direction of surface water flow is inferred from topographic maps. Surface topography suggests that the site should not receive runoff from adjacent properties except perhaps from the Valvoline property which is immediately south of the site.

Chemical Usage, Storage, and Control

Several metal and plastic drums are stored behind the North Star Cleaners building; these containers were not labeled and likely contain waste dry cleaning chemicals. It is likely that solvents and petroleum products are also used and stored at the Berco auto repair facility; however, this could not be confirmed as outside storage was not noticeable at the Berco facility.

Suspect Asbestos-Containing materials (ACM)

There was no evidence of potential ACM observed during the reconnaissance of the site. However, none of the building interiors were observed. The presence of ACM is likely due to the age of the buildings.

Solid and Hazardous Waste Disposal

Two solid waste dumpsters were present at the property: one next to North Star Cleaners and one being The Sports Page building. The North Star Cleaners dumpster is labeled as owned by Chemical Waste Management. The Sports Page dumpster is labeled Brand Trucking; many small containers of waste oil were present on the ground next to this dumpster.

Polychlorinated Biphenyl (PCB) Containing Equipment

Fluorescent lighting may be present in the site buildings. Older fluorescent ballasts may contain PCBs and do not generally pose an environmental concern unless they become damaged and start to leak. PCB containing fluorescent ballasts are exempt from the New York State Hazardous Waste Regulation (Reference 6NYCRR, Part 371).

Three pole-mounted electrical transformers were identified on site at the dry cleaners building. All are reportedly owned by NiMo. These units contain dielectric fluids which may contain PCBs. No weeping or stained areas were observed during the site reconnaissance. However, federal and state regulations do not require NiMo to test these transformers for content until the units are removed from service and discarded. As such, the PCB content of these units is not known or established. No other potential PCB-containing equipment was identified on site.

Storage Tanks

There were no underground storage tanks observed or reported as present on the subject properties. During the site reconnaissance there was visual evidence of what could be fill ports west of the dry cleaners, and some unknown type of piping on the north wall of the auto repair facility.

Water and Wastewater

Onondaga County Water Authority reportedly supplies the site with water, and the County handles the sanitary sewers for the site. No site storm drains were observed except for the drains adjacent to Route 11. The site contact reported that all of the current site tenants located to the site subsequent to the sewer service being provided to the site. Therefore, it is assumed that the restaurant, dry cleaners and auto repair shop did not (and do not) utilize active septic tanks for waste disposal.

Air Emissions

No registered air emissions were reported for the site. A small diameter stack and several blow-down pipes were observed at the back of the dry cleaning building.

Adjacent Properties

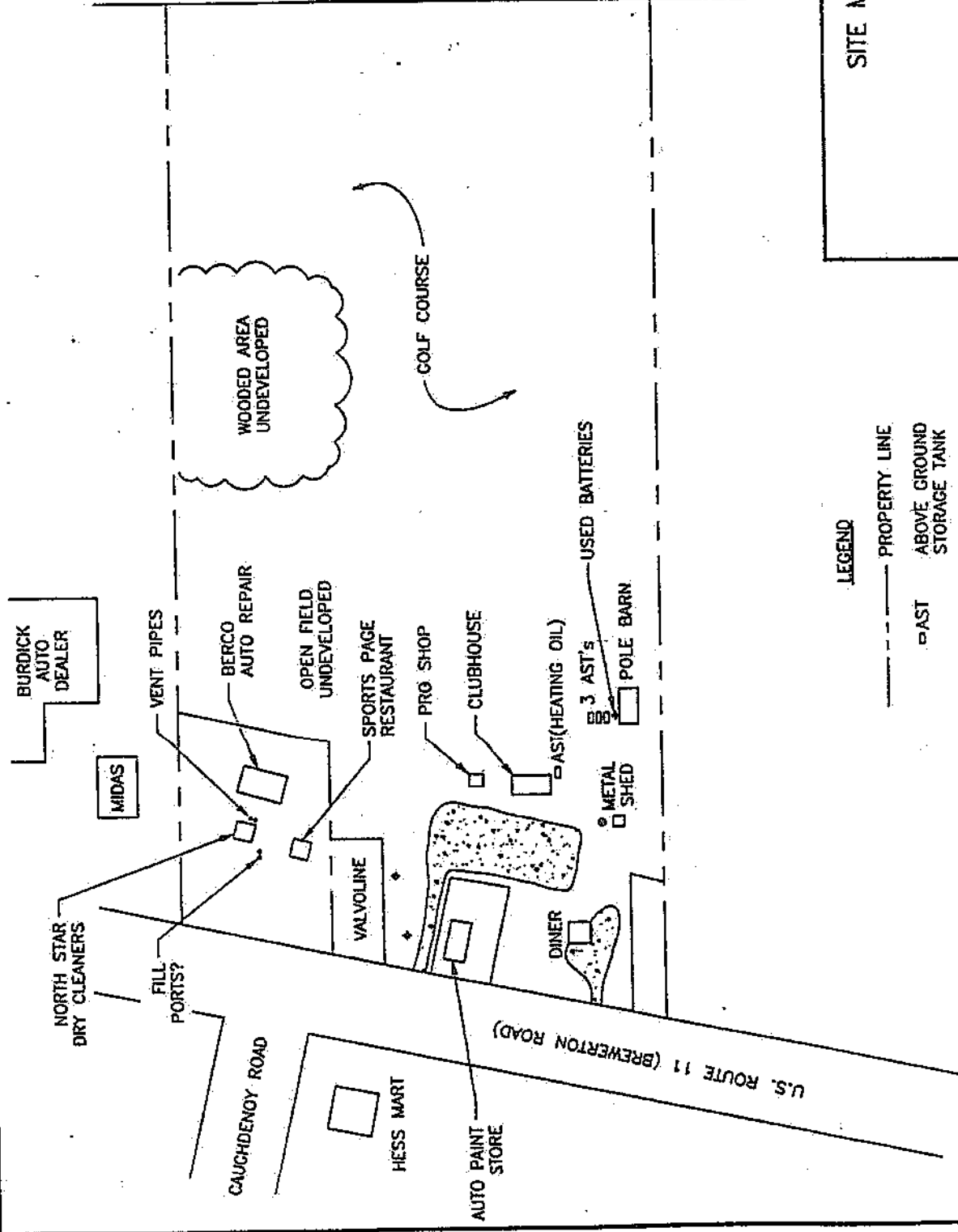
The adjacent properties to the north are an automobile dealership and a muffler shop. To the east is undeveloped property (some wooded) which is probably associated with the adjacent golf course. Interstate Route 81 is further east. A Valvoline Instant Oil is located to the south. To the west (across Route 11) a deli, a Hess service station and other retail properties are present. According to the

The Valvoline facility is reportedly about eight years old. Air photos show both of these sites as being undeveloped farmland in 1935.

AES observed no obvious visual indications of contamination on adjacent properties which could have a significant adverse effect on the subject property. However, minor soil staining is present immediately adjacent to the concrete storage pad on the Valvoline property. The site and neighboring properties are shown on Figure 5-1.



INTERSTATE ROUTE 81



SITE MAP

- LEGEND**
- PROPERTY LINE
 - AST
 - ◊ ABOVE GROUND STORAGE TANK
 - ⊕ MONITORING WELL
 - ⊙ IRRIGATION WELL
 - ▨ GRAVEL DRIVE

SCALE NIS
 DATE 10/96
 FIGURE

ADIRONDACK ENVIRONMENTAL SERVICES INC.

6.0 CONCLUSIONS AND RECOMMENDATIONS

AES conducted an environmental site assessment at a property reported to be approximately two acres in size in the Town of Cicero, Onondaga County, New York on Brewerton Road at the following addresses: 7980, 7982, and 7984. The site assessment was conducted in a manner consistent with ASTM E-1527-94: Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

AES's review identified the following site issues and concerns which require further attention/action as described below:

- Minor oil staining of soil next to a concrete storage pad owned and operated by the neighboring Valvoline Instant Oil Change facility (it is unclear if the staining is on the subject property).
- Minor oil staining around a dumpster behind The Sports Page Bar and Restaurant on the subject property;
- drum storage behind the North Star Cleaners building on the subject property; and
- air emission vents and blowdown pipes associated with the North Star Cleaner operation.

Arrangements should be made for permission to enter the site buildings. Issues such as potential ACM, hazardous materials handling and storage, the current and past usage, storage, and disposal of solvents at the dry cleaners, including air and water discharges, interior drainage and floor sumps, etc. would be evaluated during the interior inspection. Usage, storage, and disposal of oil or hazardous materials at the auto repair facility.

Based on our findings with respect to the above issues and concerns, additional investigations consisting of detailed site reconnaissance and sampling and analysis of subsurface soil and ground water may be warranted.

7.0 SIGNATURES AND QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS

Professional Qualifications

Suzanne Wheatcraft

Ms. Wheatcraft has nine years of diversified experience in environmental consulting. Her experience includes management of hazardous waste investigations and Phase I assessments. Ms. Wheatcraft has performed Phase I Environmental Site Assessments for over 100 sites, including automotive shops and dealers, manufacturing, assembly, retail, commercial, residential, agricultural and vacant land. Ms. Wheatcraft has also managed Phase II Environmental Site Assessment investigations.

Ms. Wheatcraft holds a Bachelor of Science in Geology from the University of North Carolina, and a Master of Science in Geology from Oklahoma State University.

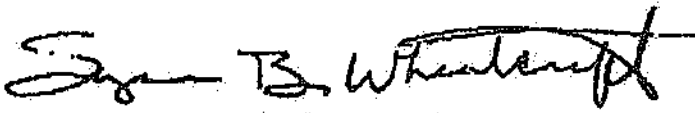
Peter C. Goutos

Mr. Goutos has 14 years environmental engineering experience in the industrial, commercial, and regulated government (Army) sectors. This experience includes facility environmental permits, site investigations, remedial activities and negotiations. Mr. Goutos has been consulted on and audited against all major federal environmental regulations and the regulations in place in over 25 states.

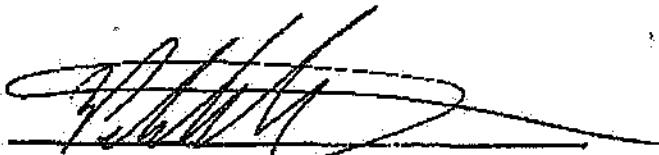
Mr. Goutos has performed over 200 environmental assessments ranging from single commercial sites, to industrial facilities of several hundred acres. He has performed assessments in the United States, Canada, Mexico, and the Far East. His experience includes project director and manager of over 25 multi-site assessments involving large-scale commercial and industrial operations. These

projects included assessments performed in the United States, Puerto Rico, Ireland, France, Germany, England, and the Pacific Rim.

Mr. Goutos holds a Bachelor of Science in Biology (SUNY Fredonia), a Bachelor of Science in Environmental Engineering (Syracuse University) and is completing a Masters project for a Masters of Engineering (Rensselaer). He has been a member of the Environmental Auditing Roundtable since 1989.

A handwritten signature in cursive script, appearing to read "Suzanne B. Wheatcraft", written over a horizontal line.

Suzanne Wheatcraft

A handwritten signature in cursive script, appearing to read "Peter C. Goutos", written over a horizontal line.

Peter C. Goutos