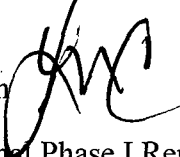


# MEMORANDUM

February 10, 2017

To: Rebecca Mendez  
From: Lawrence N. Curtin   
Re: Lancaster Plaza-Final Phase I Report

As you requested, I reviewed the Phase I Environmental Site Assessment prepared by Solutech Environmental Consultants for the former Century Lancaster Plaza sit in Coral Gables, Florida. The Phase I Report identifies a Recognized Environmental Condition as a result of documented groundwater contamination by dry cleaning operations at the site and an Historical Recognized Environmental Condition as a result of petroleum contamination that has been remediated. A Business Environmental Risk has been identified as the potential constraints on dewatering based on contaminants from dry cleaning operations in the groundwater.

With respect to the petroleum contamination, the Florida Department of Environmental Protection issued a Site Rehabilitation Completion Order on January 30, 2017. The order essentially states that the property owner is released from further obligation to conduct site rehabilitation at the facility unless additional contamination is found. The Site Rehabilitation Completion Order is good, but it is not iron clad.

The contamination from the dry cleaning operations is eligible for state funded cleanup and the site has been assigned a priority score which is below the threshold for obtaining funding. Funding for the program has been slow and depends upon Legislative Appropriations. Facilities in the program are granted a measure of liability protection and cannot be forced to conduct cleanup activities by any governmental entities, excluding federal agencies, or third parties while awaiting funding. The site could be cleaned up by the owner voluntarily and eligible costs would be reimbursed at a later date when resources become available. Depending upon the intended use of the property, for example, if a structure is planned, there could be some issues with vapor intrusion that would need to be addressed during construction activities.

Overall, the site does not look to be highly contaminated or a threat to the public and the risk of issues as a result of the former petroleum contamination appears to be low and the risk of issues as a result of the dry cleaning contamination also appears to be low based upon the acceptance into the state funding program.

Let me know if you have any questions or would like to discuss this further.

LNC/kf