



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

**MAILING ADDRESS:**

P.O. Box 1049  
Columbus, OH 43216-1049

**CERTIFIED MAIL**

February 10, 2010

Gary Guglielmi  
City of Columbus  
Department of Development  
150 South Front Street  
Columbus, OH 43215

**RE: Issuance of Covenant Not To Sue for the Wheatland Avenue Site  
(#09NFA359)  
Project ID # 125-002314-003**

Dear Mr. Guglielmi:

I am pleased to inform you that on February 10, 2010, the Director of the Ohio Environmental Protection Agency (Ohio EPA) issued a covenant not to sue (CNS) to the city of Columbus for the Wheatland Avenue Site, located at on the east side of Wheatland Avenue, north of West Broad Street, Columbus, Franklin County, Ohio. The CNS was issued as final findings and orders pursuant to Ohio Revised Code (ORC) Chapter 3746 and Ohio Administrative Code (OAC) Chapter 3745-300.

The CNS states that, based on the no further action (NFA) letter, and subject to all conditions set forth in these findings and orders, Ohio EPA covenants not to sue and releases the city of Columbus, and its agents, employees, officers, directors, successors and assigns, and successors and assigns of the Property, from all civil liability to the State of Ohio to perform additional investigational and remedial activities. The CNS and release of liability applies to the Property that has undergone a Phase I or Phase II property assessment in compliance with ORC Chapter 3746 and OAC Chapter 3745-300 or has been the subject of remedial activities conducted under ORC Chapter 3746 and OAC Chapter 3745-300 to address a release of hazardous substances or petroleum, and the assessment or the remedial activities demonstrate or result in compliance with applicable standards.

Enclosed is a certified copy of the CNS and its exhibits for the recording of the documents in the same manner as a deed for the Property, as instructed by the CNS (see the "Conditions and Limitations" section.) The enclosed affidavit must be presented to the county recorder's office staff to support the required recording. Remember to submit to Ohio EPA after the recording a copy of the CNS that shows the filing date stamp of the county recorder's office.

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director



You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Congratulations on the issuance of this CNS. Many persons within the agency, the city of Columbus, and Carnoustie Consulting, Ltd. and Civil and Environmental Consultants, Inc., among others, worked hard to remove the environmental barriers associated with redeveloping this Property. If you have any questions or concerns, feel free to contact me at (614) 644-2924 or [tiffani.kavalec@epa.state.oh.us](mailto:tiffani.kavalec@epa.state.oh.us).

Sincerely,



Tiffani Kavalec, Manager  
Division of Emergency and Remedial Response  
Assessment, Cleanup and ReUse Section

Enclosure

- c: Jeffrey P. Hullinger, Certified Professional, Carnoustie Consulting, Ltd.  
Ron Wells, Civil and Environmental Consultants, Inc.
- ec: Raymond R. Moreno, DERR/CDO  
Deborah Strayton, DERR/CDO  
Ann Fischbein, Legal Office  
DERR CO/CDO Files

TO BE RECORDED IN DEED RECORDS,  
PURSUANT TO ORC 317.08(A)

AFFIDAVIT

STATE OF OHIO )  
 )  
COUNTY OF FRANKLIN ) ss:

Before me, the subscriber, a Notary Public in and for the State of Ohio, personally appeared Tonya R. Lassiter, who, being duly sworn according to law, deposes and says that: (i) she is employed as a records management officer in the Legal Office of the Ohio Environmental Protection Agency ("Ohio EPA") and, as such, is authorized to sign this Affidavit on behalf of Ohio EPA; and (ii) the attached document is a true and correct copy of the Covenant Not to Sue / Director's Final Findings and Orders issued by the Director, and entered in the Ohio EPA Director's Journal on February 10, 2010, regarding property known as the Wheatland Avenue Site, located on the east side of Wheatland Avenue north of West Broad Street in Columbus, Franklin County, Ohio and further described in the attached Covenant Not to Sue.

Tonya R. Lassiter  
Tonya R. Lassiter  
Records Management Officer  
Ohio EPA Legal Office

Sworn to and subscribed before me, a Notary Public in and for the State of Ohio, this 10<sup>th</sup> day of February, 2010.

[Signature]  
Notary Public  
State of Ohio

*Permanent Commission  
No expiration, R.C. 147.03*

This instrument prepared by:

Ann Fischbein, Attorney  
Ohio EPA Legal Office  
P.O. Box 1049  
Columbus, Ohio 43216-1049



**SUSAN C. KROEGER**  
Attorney at Law  
Notary Public  
State of Ohio  
Lifetime Commission

BEFORE THE  
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the matter of:

City of Columbus  
Department of Development  
150 South Front Street  
Columbus, OH 43215

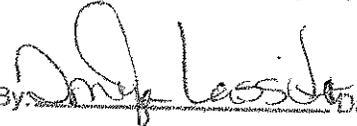
Regarding property known as:

Wheatland Avenue Site  
East Side of Wheatland Avenue,  
North of West Broad Street  
Columbus, OH 43204

Covenant Not to Sue

Director's Final Findings  
and Orders

I certify this to be a true and accurate copy of the  
official documents as filed in the records of the Ohio  
Environmental Protection Agency.

By:  Date: 2-10-10

Pursuant to Ohio Revised Code ("ORC") Chapter 3746 and Ohio Administrative Code ("OAC") Chapter 3745-300, the Director of the Ohio Environmental Protection Agency (the "Director") hereby makes the following Findings and issues the following Orders ("Findings and Orders").

FINDINGS

1. A No Further Action Letter, No. 09NFA359 (the "NFA Letter"), was submitted on March 19, 2009 to the Director under the Voluntary Action Program on behalf of the city of Columbus (the "Volunteer"), by Jeffrey P. Hullinger, P.E., a certified professional, No. CP 214, as defined in ORC 3746.01(E) and OAC 3745-300-01(A) (Effective April 19, 2006) (the "Certified Professional").
2. The Certified Professional issued the NFA Letter by his certified professional affidavit on February 26, 2009. The Certified Professional also submitted to the Director addenda to the NFA Letter, which were issued under certified professional affidavit on July 13, 2009, December 14, 2009 and January 20, 2010. For the purposes of these Findings and Orders, the term "NFA Letter" includes the addenda.

3. The NFA Letter describes the investigational and remedial activities undertaken at the approximately 20.1-acre property, known as the Wheatland Avenue Site and formerly known as the Buckeye Youth Center and Columbus State Hospital, located on the east side of Wheatland Avenue, north of West Broad Street, Columbus, Franklin County, Ohio (the "Property"). An exact legal description of the Property is attached hereto as Exhibit 1. A Property location map is attached hereto as Exhibit 2. Based on information in the NFA Letter, the Property is owned by the city of Columbus and the parcel number is 010-267201.
4. The Certified Professional prepared pursuant to OAC 3745-300-13(J)(Effective April 19, 2006) an executive summary of the NFA Letter, which is attached hereto as Exhibit 3.

### **Summary of the Voluntary Action for the Property**

5. Based upon the information in the NFA Letter, the Volunteer undertook the following investigational and remedial activities regarding the Property:
  - a. A Phase I property assessment, in accordance with OAC 3745-300-06 (Effective October 21, 2002), to determine whether there is any reason to believe that a release of hazardous substances or petroleum has or may have occurred on, underlying or is emanating from the Property.
  - b. A Phase II property assessment, in accordance with OAC 3745-300-07 (Effective October 21, 2002), including but not limited to investigations of identified areas and affected media, to assess environmental conditions related to releases of hazardous substances and/or petroleum.
  - c. Remedial activities, conducted in accordance with OAC 3745-300-15 (Effective October 21, 2002), including the removal of approximately 1724 tons of contaminated soil and debris from four identified areas for off-Property disposal, abatement of asbestos-containing materials from an existing structure prior to its demolition and removal of asbestos-containing gravel from a crawl space beneath the structure after its demolition.
  - d. A demonstration that the Property complies with applicable standards following completion of remedial activities for the identified COCs in the identified areas and affected media at the Property through a comparison to background levels in accordance with OAC 3745-300-07 (Effective October 21, 2002), the use of generic numerical standards in accordance with OAC 3745-300-08 (Effective October 21, 2002), and the use of a Property-specific risk assessment in accordance with OAC 3745-300-09 (Effective October 21, 2002).
6. The Certified Professional has verified by affidavit that the voluntary action was

conducted and the NFA Letter was issued for the Property in accordance with ORC Chapter 3746 and OAC Chapter 3745-300, that the Property is eligible for the Voluntary Action Program, and that the voluntary action was conducted in compliance with all applicable federal, state and local laws and regulations.

7. At the time that analyses were performed, TestAmerica Laboratories, Inc., Environmental Science Corporation, EA Group and Pace Analytical Services, Inc. were certified laboratories, No(s). CL0024, CL0069, CL0015 and CL0065, respectively, as defined in ORC 3746.01(D) and OAC 3745-300-01(A) (Effective April 19, 2006), whose services were used in support of the NFA Letter (the "Certified Laboratories").

#### **Applicable Standards**

8. Based on the information contained in the NFA Letter and all conditions set forth in these Findings and Orders, the Property meets applicable standards contained in ORC Chapter 3746 and OAC Chapter 3745-300 for various uses including unrestricted land use and unrestricted potable ground water use. The applicable standards for the Property are those in effect when the NFA Letter was issued on February 26, 2009. The applicable standards, the methods of achieving compliance with the standards, and the associated points of compliance for the standards for each complete exposure pathway, are identified in the NFA Letter, which contains a summary table included as Table 8 and titled *Applicable Standards and Remedial Activities for Human Exposure Pathways* in the Phase II property assessment report of the NFA Letter. The standards include one or more of the following:
  - a. Generic numerical standards determined in accordance with OAC 3745-300-08 (Effective October 21, 2002).
  - b. Property-specific risk assessment standards developed in accordance with OAC 3745-300-09 (Effective October 21, 2002).
  - c. Background standards determined in accordance with ORC 3746.06(A) and OAC 3745-300-07(H) (Effective October 21, 2002).
  - d. Standards for residential (potable) use of ground water in the unconsolidated ground water zone underlying the Property, applied in accordance with ORC 3746.06(B).
9. Pursuant to ORC 3746.12(A), the Director of Ohio EPA is authorized to issue a covenant not to sue for the Property through these Findings and Orders. Based on the NFA Letter and subject to all conditions set forth in these Findings and Orders, the remedial activities for the Property are protective of public health and safety and the environment.

## ORDERS

### Covenant

1. Based on the NFA Letter, and subject to all conditions set forth in these Findings and Orders, Ohio EPA hereby covenants not to sue and releases the city of Columbus, and its agents, employees, officers, directors, successors and assigns, and successors and assigns of the Property, from all civil liability to the State of Ohio (the "State") to perform additional investigational and remedial activities. This covenant not to sue and release of liability (the "Covenant") applies to the Property that has undergone a Phase I or Phase II property assessment in compliance with ORC Chapter 3746 and OAC Chapter 3745-300 or has been the subject of remedial activities conducted under ORC Chapter 3746 and OAC Chapter 3745-300 to address a release of hazardous substances or petroleum, and the assessment or the remedial activities demonstrate or result in compliance with applicable standards.

### Conditions and Limitations

#### Requirement to Record These Findings and Orders / Covenant Not to Sue

2. Within thirty (30) days after the issuance of these Findings and Orders, the city of Columbus shall:
  - a. File with the Franklin County Recorder's Office, for recording in the same manner as a deed to the Property pursuant to ORC 3746.14, a copy of these Findings and Orders, including Exhibits 1 (Legal Description), 2 (Property Location Map), 3 (Executive Summary).
  - b. Submit to Ohio EPA a copy of the Findings and Orders that shows the filing date stamp of the Franklin County Recorder's Office or other reliable information that verifies the recording of the Findings and Orders in accordance with this Order. The submission shall include a cover letter that identifies "*Recorded - Covenant Not to Sue for NFA Letter No. 09NFA359.*" The submission shall be delivered either (1) electronically to the DERR Records Management Officer at Ohio EPA's Central Office, at [records@epa.state.oh.us](mailto:records@epa.state.oh.us) or (2) by U.S. mail or other reliable means to both Ohio EPA's Central Office, 50 West Town Street, P.O. Box 1049, Columbus, OH 43216-1049, Attention: DERR Records Management Officer and Ohio EPA's Central District Office, 50 West Town Street, P.O. Box 1049, Columbus, OH 43216-1049, Attention: DERR Site Coordinator for the Wheatland Avenue Site.

Limits of Covenant

3. Pursuant to ORC 3746.12(B)(1), the Covenant shall remain in effect for as long as the Property continues to comply with the applicable standards upon which the Covenant is based, as referenced in these Findings and Orders. Upon a finding pursuant to ORC 3746.12(B)(2) that the Property or portion thereof no longer complies with applicable standards upon which issuance of the Covenant was based and receipt of the Director's notice of that fact and the requirements of ORC 3746.12(B)(3), the person(s) responsible for maintaining compliance with those standards shall receive an "opportunity to cure" the noncompliance. ORC 3746.12(B)(4) provides for revocation of the Covenant upon a Director's finding that the noncompliance has not been cured.
4. The Covenant shall not apply to releases of hazardous substances or petroleum that occur after the issuance of the NFA Letter.
5. The Covenant shall not apply:
  - a. To claims for natural resource damages the State may have pursuant to Sections 107 or 113 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA"), 42 U.S.C. 9607 and 9613, as amended.
  - b. To claims the State may have pursuant to Section 107 of CERCLA, 42 U.S.C. 9607, as amended, for costs other than those for damages to natural resources, provided that the State incurs those other costs as a result of an action by the United States Environmental Protection Agency.
  - c. As otherwise specifically provided in ORC Chapter 3746, including but not limited to obligations arising under other applicable laws.
6. Nothing in the Covenant limits the authority of the Director to act under ORC 3734.13 and 3734.20 to 3734.23, or to request that a civil action be brought pursuant to the ORC or common law of the State to recover the costs incurred by Ohio EPA for investigating or remediating a release or threatened release of hazardous substances or petroleum at or from the Property, when the Director determines that the release or threatened release poses an imminent and substantial threat to public health or safety or the environment.
7. Nothing in the Covenant shall be construed to limit or waive the Director's authority to revoke the Covenant in response to any of the circumstances for revocation of a covenant, as provided in ORC Chapter 3746 and OAC Chapter 3745-300.

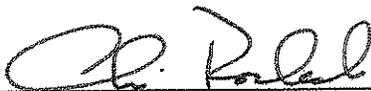
### Ohio EPA Access to Property

8. Pursuant to ORC 3746.21 and at reasonable times, upon proper identification, and stating the necessity and purpose as directed by applicable law, authorized representatives of the Director shall be granted access to the Property for the inspection or investigation purposes authorized under applicable law.

### Transfer

9. Pursuant to ORC 3746.14 and OAC 3745-300-13(L) (Effective April 19, 2006), the NFA Letter and the Covenant Not to Sue/Findings and Orders may be transferred to any person by assignment or in conjunction with the acquisition of title to the Property.

IT IS SO ORDERED:



Chris Korleski, Director  
Ohio Environmental Protection Agency

FEB 10 2010

Date

**Exhibit 1**  
**Legal Description**



Civil & Environmental Consultants, Inc.

8740 Orion Place, Suite 100 • Columbus, Ohio 43240

Phone 614.540.6633 • Fax 614.540.6638

CHICAGO, IL. • CINCINNATI, OH • EXPORT, PA. • INDIANAPOLIS IN.  
NASHVILLE, TN. • PITTSBURGH, PA. • ST. LOUIS, MO.

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**DESCRIPTION OF A 20.098 ACRE TRACT LOCATED  
NORTH OF WEST BROAD STREET,  
EAST OF WHEATLAND AVENUE,  
CITY OF COLUMBUS, OHIO**

Situated in the State of Ohio, County of Franklin, City of Columbus, in Virginia Military Survey 2268, being all of a 20.098 acre tract (Parcel 1) conveyed to the City of Columbus, by deed of record in Instrument Number 200307020202150, all records herein are from the Recorder's Office, Franklin County, Ohio, said 20.098 acre tract being more particularly described as follows:

**BEGINNING FOR REFERENCE** at a found iron pin at the intersection of the northerly right-of-way of West Broad Street ( 80' R/W) and the easterly right-of-way of Wheatland Avenue (40' R/W), being at the southwest corner of a 0.494 acre tract (Parcel 1) conveyed to the City of Columbus, by deed of record in Official Record 19320, Page E14.

Thence North 08°21'03" West, a distance of 502.10 feet, along the easterly right-of-way of said Wheatland Avenue, the westerly line of said 0.494 acre tract, and the westerly line of a 0.865 acre tract (Parcel 2) conveyed to the City of Columbus, by deed of record in Official Record 19320, Page E14, and the westerly line of a 2.410 acre tract (Parcel 2) conveyed to the City of Columbus, by deed of record in Instrument Number 200307020202150, passing a found iron pin at the northwest corner of said 0.865 acre tract and the southwest corner of said 2.410 acre tract at a distance of 251.05 feet, to a set iron pin at the northwest corner of said 2.410 acre tract and the southwest corner of said 20.098 acre tract, being the **TRUE POINT OF BEGINNING**.

Thence North 08°21'03" West, a distance of 1810.12 feet, along the westerly lines of said 20.098 acre tract, and the easterly right-of-way of said Wheatland Avenue, to a set iron pipe at the northwest corner of said 20.098 acre tract;

Thence the following three (3) courses and distances along the northerly lines of said 20.098 acre tract:

1. North 78°11'34" East, a distance of 108.55 feet, to a set iron pipe;
2. North 86°10'43" East, a distance of 273.91 feet, to a set iron pipe;

3. North 89°53'49" East, a distance of 111.16 feet, to a set iron pipe at the northeast corner of said 20.098 acre tract;

Thence the following two (2) courses and distances along the easterly lines of said 20.098 acre tract and said 2.410 acre tract:

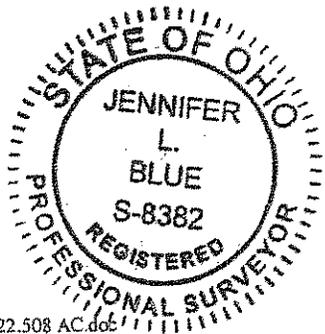
1. South 08°21'04" East, a distance of 1121.50 feet, to a found iron pin0;
2. South 03°15'38" East, a distance of 699.77 feet, to a set iron pipe at the southeast corner of said 20.098 acre tract and the northeast corner of said 2.410 acre tract;

Thence South 86°53'44" West, a distance of 431.14 feet, along a common line of said 20.098 acre tract and said 2.410 acre tract, to the **TRUE POINT OF BEGINNING**, containing 20.098 acres, more or less. Being subject to all easements, restrictions, and right-of-ways of record.

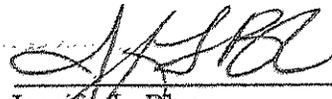
This description was based on record information from the Franklin County Recorder's Office in November 2008.

The bearings are based on the northerly right-of-way of West Broad Street as being North 08°21'03" West for the centerline of Wheatland Avenue, per Franklin County Monuments.

All iron pipes set are 1 inch in diameter by 30 inches in length with an I.D. cap bearing the name "CBC PROP COR".



Civil & Environmental Consultants, Inc.

  
Jennifer L. Blue Date 2-26-09  
Registered Surveyor No. S-8382

**Exhibit 2**  
**Property Location Map**

**SUBMITTAL & REVISION RECORD**

NO	DATE	DESCRIPTION
△		

**LEGEND**

- = SET IRON PIPE, 1" DIAMETER, 30" LONG, WITH AN I.D. CAP STAMPED "CEC PROP COR".
- = FOUND IRON PIN, WITH NO CAP

**SITUATE**

SITUATE IN THE STATE OF OHIO, COUNTY OF FRANKLIN, CITY OF COLUMBUS, AND BEING IN VIRGINIA MILITARY SURVEY 266B.

**BASIS OF BEARINGS**

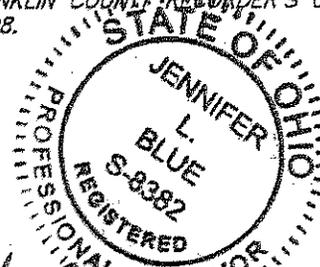
BEARINGS ARE BASED ON THE NORTHERLY RIGHT-OF-WAY OF WEST BROAD STREET AS BEING NORTH 08°21'03" WEST PER FRANKLIN COUNTY GPS OBSERVATIONS

**BOUNDARY SURVEY NOTE**

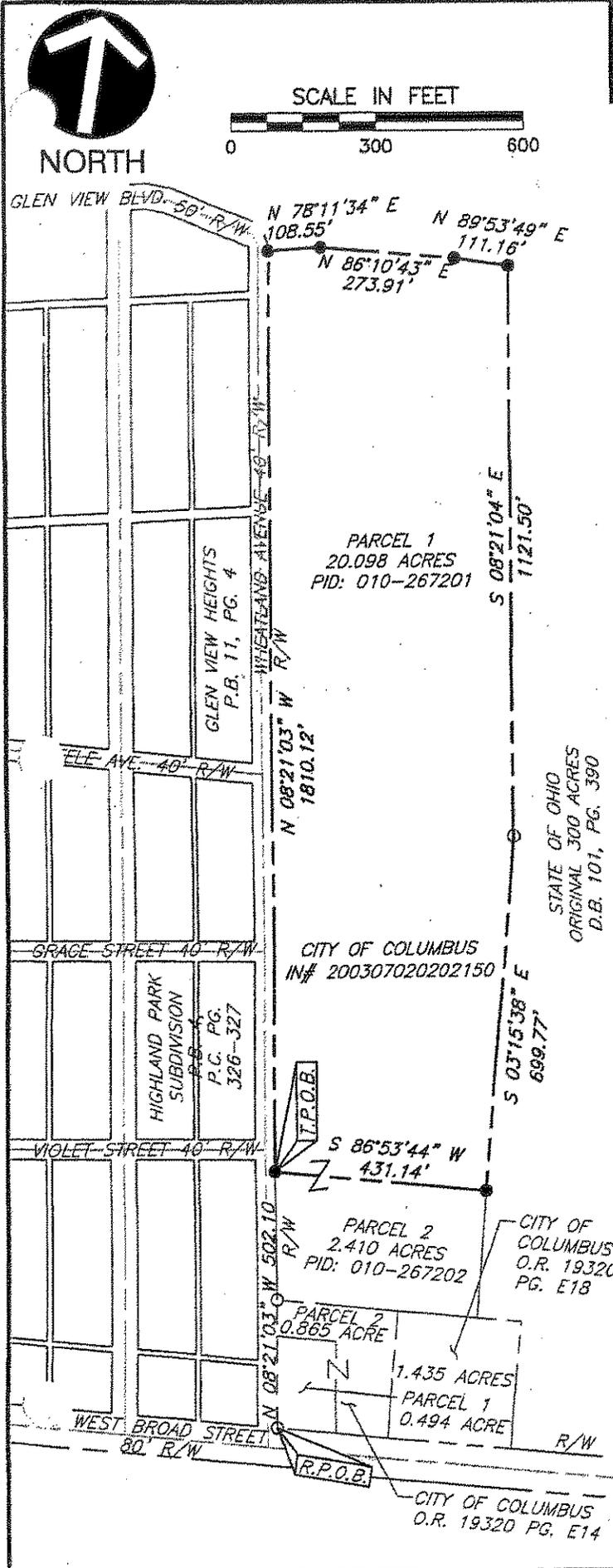
THIS PLAT CONSTITUTES A BOUNDARY SURVEY AS SET FORTH IN THE MINIMUM STANDARDS FOR BOUNDARY SURVEYING IN THE STATE OF OHIO, ADMINISTRATIVE CODE CHAPTER 4733-37 AND PROMULGATED BY THE BOARD OF REGISTRATION FOR PROFESSIONAL ENGINEERS AND SURVEYORS OF THE STATE OF OHIO PURSUANT TO CHAPTER 4733.

**SURVEYOR'S CERTIFICATE**

THIS EXHIBIT WAS BASED ON RECORD INFORMATION FROM THE FRANKLIN COUNTY RECORDER'S OFFICE IN NOVEMBER 2008.



*JLB* 2-26-09  
 JENNIFER L. BLUE P.S. 8382 DATE



**CEC**  
**Civil & Environmental Consultants, Inc.**  
 8740 Orion Place, Suite 100 - Columbus, OH 43240  
 614-540-6633 · 888-598-6808  
 www.cecinc.com

**BOUNDARY SURVEY OF 20.098 ACRES**  
**NORTH OF WEST BROAD STREET**  
**EAST OF WHEATLAND AVENUE**  
 Situate In  
**CITY OF COLUMBUS**  
**FRANKLIN COUNTY, OHIO**  
 Made For  
**THE CITY OF COLUMBUS**  
**WHEATLAND AVENUE PHASE II**  
**COLUMBUS, OHIO**

DATE:	FEB, 26, 2009	SCALE:	1"=300'	DRAWING NO.:	
DRAWN BY:	JSC	CHECKED BY:	JLB	<b>BN DY</b>	
PROJECT NO:	052-366	APPROVED BY:	JLB		SHEET 1 OF 1

**Exhibit 3**  
**Executive Summary**

**NO FURTHER ACTION LETTER**

**EXECUTIVE SUMMARY  
WHEATLAND AVENUE PROPERTY  
NORTH OF THE INTERSECTION OF WEST BROAD STREET AND  
WHEATLAND AVENUE  
COLUMBUS, OHIO**

**Prepared For:**

**THE CITY OF COLUMBUS  
DEPARTMENT OF DEVELOPMENT  
150 SOUTH FRONT STREET  
COLUMBUS, OHIO**

**Prepared By:**

**Jeffrey P. Hullinger  
Ohio VAP CP 214  
614-467-9252**

**February 2009  
Amended July 13 and December 11, 2009, and January 20, 2010**

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## 1.0 INTRODUCTION

This executive summary has been prepared to present a concise summary of the work conducted at the subject property in preparation for submittal to obtain a No Further Action determination under the Ohio Voluntary Action Program. The summary meets the requirements of OAC 3745-300-13(H) utilizing the format provided by the Ohio EPA for submitting the NFA letter, and OAC 3745-300-13(J) which is for recording a summary of the NFA letter in the county recorder's office.

The 20.1-acre Property is located north of the intersection of West Broad Street and Wheatland Avenue in the City of Columbus, Franklin County, Ohio. The Property is part of a larger, ~500-acre community called the Hilltop. The area was initially developed with residences during the Civil War period. It was subdivided and platted in the late 1870's. The Columbus State Hospital, which existed across much of the Property, was constructed in 1870. A copy of the legal description for the Property is included in Attachment A to this Executive Summary.

Jeffrey P. Hullinger, Ohio Voluntary Action Program (VAP) Certified Professional #214, directed preparation of an amended Phase I ESA and Phase II ESA on the Property. The Phase I and Phase II ESAs conformed to the requirements of the Ohio Voluntary Action Program (VAP) relative to Phase I and Phase II Property Assessments, as outlined in 3745-300-06, and 07. Additionally, remediation (asbestos abatement and removal of contaminated soils) was conducted under the direction of Civil & Environmental Consultants, Inc. (CEC), in conjunction with additional foundation and subgrade demolition. The NFA Letter was issued on February 26, 2009.

Copies of the NFA letter can be obtained for copying costs and associated labor charges by contacting Civil & Environmental Consultants at 8740 Orion Place, Suite 100, Columbus, Ohio 43240, or by telephone at 614-540-6633. The NFA letter can also be viewed at that location and at Ohio EPA, 50 West Town Street.

## 2.0 SUMMARY OF NO FURTHER ACTION LETTER

Based on the results of the Phase I and Phase II Property Assessments conducted under the direction of the CP, the Property meets the requirements under the VAP for issuance of a Covenant Not to Sue (CNS). All COCs except arsenic meet VAP GDCS, as adjusted in accordance with multi-chemical adjustments as required by OAC 3745-300-08 and 3745-300-09. Arsenic levels in the soils were compared to the site-specific background, and were found to be characteristic of natural background conditions in the area. The current and foreseeable use of the Property is residential, with no use restrictions.

### 2.1 Phase I Environmental Property Assessment

The Phase I environmental assessment on the Property was initiated in January 2005, and the initial Phase I report was issued in March 2005 to the City of Columbus. Following Phase II assessment and completion of remediation activities, the Phase I activity was updated and finalized on February 26, 2009. An amendment to the NFA Letter was completed on July 13, 2009. A second amendment was completed December 11, 2009, and a third and final amendment to correct minor omissions and errors on January 20, 2010.

The purpose of the Phase I assessment was to evaluate the condition of the Property and to define the scope of additional investigation that must be conducted, if necessary, to evaluate conditions of any Identified Areas as defined in the VAP rules.

Methods of inquiry employed for the Phase I include the following:

- Acquisition and review of state and federal databases and records regarding ownership use and environmental compliance;
- Property inspections, with the most recent by the CP on November 24, 2009;
- Review of previous environmental assessment reports prepared for the Property;
- Review of adjoining properties records and drive-by inspection of these properties;
- Interviews with current and former facility personnel; and
- Use of geologic, hydrogeologic and hydrologic data from public records.

The historical uses of the Property described in this section are based on the information obtained from the above sources. The Property was the western part of the larger Columbus State Hospital which was founded in the 1870s. The first buildings on the Property were constructed between 1901 and 1922. By the early 1960s, the entire southern two-thirds of the Property were developed with various structures including a laundry facility and laboratory. The buildings were connected by numerous underground tunnels. The majority of the buildings were demolished between 1995 and 1996. Two leaking underground storage tanks (LUSTs) were removed from the southeast portion of the Property in 1996. A leaking electrical transformer was reported on the Property in May 1985 and subsequently removed.

Areas of the Property that have been identified as having the potential for historical releases to soil or groundwater, and where further investigation was recommended, are discussed below.

1. Electric Pit – An electric equipment pit was located in the central portion of the Property near the gymnasium/chapel building. Any transformers or other electrical equipment were removed from the pit before the 2005 Property visits.
2. Gymnasium/Chapel Structure – A vacant structure consisting of a chapel, pool, gymnasium, and mechanical rooms was located in the west-central portion of the Property. Approximately 19,000 square feet of asbestos-containing floor tile and 200 asbestos-containing fittings on fiberglass-insulated pipe were located in the building.
3. Offsite Sources – Several offsite sources to the south and west of the Property had the potential to have created impacts to the Property through the shallow groundwater pathway.
4. Former On-Property USTs – Two 1,000 gallon gasoline USTs were once present on the Property; although a BUSTR No Further Action determination was received, a previous non-VAP Phase II assessment indicated the potential for impacts from the USTs.

5. Former Maintenance Shop and Laundry Buildings – A laboratory, laundry facility, and maintenance shop were previously located on the southeastern portion of the Property. Of these, the laundry and maintenance facilities were adjacent to one another and together constitute IA 5.
  
- 5A. Former Laboratory – The laboratory was located west of the maintenance shop and laundry.
  
6. Slag/Foundry Sand Fill – Suspected slag/foundry sand was observed on the ground surface and in test pits in the northwest portion of the Property.
  
7. Tar Release – A container of what appeared to be roofing tar was found adjacent to the foundation of the former gymnasium/chapel, and tarry material was also observed to have been released to adjacent subsurface soils.
  
8. Refuse Area – An area north of the gymnasium and chapel building contained metal sheeting, piping, bricks, shingles, and apparent cinders or ash.
  
9. Chapel Area – Apparent cinders or ash were found underneath the chapel portion of the gymnasium/chapel building.
  
10. Elevator Sump – During foundation demolition activities, a sump area was encountered with oily residues evident in its base.
  
11. Imported Soils – Excess soil from the fire station south of the Property was, without prior notice to the CP, deposited onto the Property.

## **2.2 Phase II Environmental Property Assessment**

Initial Phase II assessment field activities were conducted between April and June 2005 by CEC personnel. Staff Geologist Colin Flaherty and Project Scientist Kevin McCarty were responsible

for sample collection and direction of field subcontractors. Severn Trent Laboratories of North Canton, Ohio performed the laboratory analyses. Asbestos survey activity was conducted by Michael Jefferson, James Hack, and Richard Grant of Calderon-Grant, Inc., and Assistant Project Manager Jayme Fuller of CEC. Sampling was conducted of surface soils, subsurface soils (in selected IAs), and groundwater.

Additional sampling and assessment were conducted during and following demolition and remediation activities, from May 2007 through November 2009. Sampling, including confirmation sampling, was conducted by Kevin McCarty, Assistant Project Manager Aaron Shear, CP Jeff Hullinger and Staff Scientists Vanessa Hall and Greg Dellner. Analysis of samples from these sampling events was by Severn Trent Laboratories of North Canton, Ohio (later TestAmerica), Pace Analytical Services, Inc. of Indianapolis, and by Environmental Science Corp. of Mt. Julien, Tennessee.

#### 2.2.1 Soil Investigation and Findings

Surface soil samples were typically collected using a stainless steel hand auger at depths between the surface and 2 feet below existing ground surface. The device was decontaminated between samples using diluted nitric acid and rinsed thoroughly with distilled water. The concrete chip samples were obtained by using a hammer and concrete chisel. A 15 centimeter square was placed on the existing concrete pad and the concrete was chiseled out to a uniform depth.

A total of seven groundwater monitoring wells were installed using 4.25" ID hollow-stem augers which created an 8" diameter borehole. Soil was sampled continuously from the existing ground surface to the total depth in order to have detailed geologic information of the stratigraphy that underlies the site. The soil was sampled using a steel split spoon that was decontaminated and rinsed before each sample was taken. Deep subsurface soil samples were generally collected using this technique. However, subsurface samples in IA #4 (former USTs) were collected from the sidewalls of excavations using hand trowels collecting material from the excavator bucket.

Chemicals of concern detected in samples are identified in the Phase II Property Assessment Report that is submitted as an integral component to the NFA Letter, and they are summarized in Table 4 of that report along with their characteristic concentrations.

### 2.2.2 Groundwater Investigation and Findings

CEC installed five monitoring wells on the Property (MW-1 through MW-5) in order to evaluate potential impacts from off-Property sources. Two more monitoring wells (TW-1 and TW-2) and one deep soil boring (IA-6-B-4) were installed in order to evaluate depth to groundwater in the vicinity of IA-6 and IA-8. The results of the boring and monitoring well installation program showed that the unconsolidated deposits underlying the Wheatland Avenue Property consists mainly of glacially derived silty clay with sand and gravel (till), and the occurrence of groundwater in the uppermost unconsolidated materials is inconsistent and somewhat isolated. The depth at which groundwater was encountered across most of the Property was between 19 and 26 feet below ground surface (bgs); groundwater in the IA-6 area was not encountered above borehole refusal at 35 feet bgs. The borings were created in most cases, and for all monitoring wells, using 4.25" ID hollow-stem augers which created an 8" diameter borehole. The deeper boring in IA-6 was installed using a Geoprobe® direct-push sampling rig. Soil was sampled continuously from the existing ground surface to the total depth in order to have detailed geologic information of the stratigraphy that underlies the site. The soil was sampled using a steel split spoon that was decontaminated and rinsed before each sample was taken.

The monitoring wells were constructed using 2" diameter, flush-threaded schedule 80 PVC. The well screens were encased with a clean sand pack to two feet above the top of the screen, then a bentonite seal was placed above the sand with a minimum thickness of two feet, and the wells were grouted to the ground surface. Once the down-hole materials were set, a steel protective casing was set in concrete except in the case of TW-1 and TW-2 adjacent to IA-8. A stainless-steel bailer was used to partially develop each well and remove the heavy sediments in the bottom of the wells. The bailer was decontaminated between use in each well. After all the wells were partially developed with a bailer, a whaler pump was used to continue development. The pump was also decontaminated between use in each well and new tubing was used in each well.

All of the monitoring wells were initially sampled (i.e. in the 2005 Phase II investigation) using conventional sampling methods with disposable dedicated bailers and rope. All of the groundwater samples were analyzed for VOCs, PCBs, and lead. The initial samples collected for

lead analysis were field filtered due to the high turbidity of the groundwater. Analytical results for all chemicals of concern in all samples were non-detect. Additional sampling was conducted in November 2009 using low-flow sampling techniques to permit unfiltered sample analysis for lead. Those samples were non-detect, confirming that off-Property sources have not affected groundwater on the Property.

### 2.2.3 Surface Water and Sediments Investigation and Findings

There is no surface water present on the Property. Sediments are present in a wetland area located down-drainage from IA-6, and samples were collected for selenium analysis to evaluate whether the presence of this chemical in IA-6 affects those sediments. Selenium concentrations in sediments were less than 0.88 mg/kg, indicating essentially no impact on the wetland sediments. Concentrations of other COCs in the wetland sediments, including SVOC and metals, were similarly below concentrations indicating adverse impact.

### 2.2.4 Exposure Pathway Assessment

Based on the initial pathway analysis, the following exposure pathways were identified to be complete for this assessment for Identified Areas 4 through 11, except as noted:

- Direct contact with impacted soils by onsite residents and workers, including inhalation of particulates
- Leaching of chemicals to groundwater
- Direct contact with groundwater by onsite residents and workers
- Vapor intrusion to indoor air, impacts to onsite residents and workers

These complete exposure pathways were evaluated in the Phase II data evaluation process.

## 2.3 **Determination of Applicable Standards**

Applicable standards were set for each IA as follows. In every case, the generic direct-contact standard for chemicals of concern relates to the residential standard.

IA #1 – Electric Pit: Generic direct-contact standard for PCBs was used to compare concentrations found in concrete samples from underneath former transformers.

IA #2 – Gymnasium/Chapel Structure: Asbestos was the only constituent of concern. The applicable standard consists of removal of all asbestos-containing materials from building

materials, removal of all foundation and subgrade material that potentially contained asbestos, and removal of a minimum of two inches of soil beneath any such subgrade material.

IA #3 – Offsite Sources: Applicable standards for groundwater (the pathway for potential impact to the site) are generic unrestricted potable use standards.

IA #4 – Former On-Site USTs: For VOC and SVOC chemicals, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements, and each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS). For lead and petroleum hydrocarbons, generic direct-contact standards are the applicable standards.

IA #5 – Former Maintenance Shop and Laundry Buildings: For all detected chemicals of concern, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements, and each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS).

IA #6 – Slag/Foundry Sand Area: For all detected chemicals of concern except arsenic and lead, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements. These applicable standards are met in the IA. Within the source area near the top of the bluff, protection of groundwater meeting unrestricted potable use standards (POGWMUPUS) was demonstrated by weight of evidence, specifically demonstrating the presence of 35 feet of fine-grained dry soil above the shallowest groundwater zone. Within the lower wetland area, each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS). For arsenic, the site-specific background concentration of 25.8 mg/kg is the applicable standard. For lead, the generic direct-contact standard of 400 mg/kg is the applicable standard.

IA #7 – Tar Release Area: For SVOC chemicals, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements, and each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS). For petroleum hydrocarbons, generic direct-contact standards are the applicable standards.

IA #8 – Refuse Area: For all metals (except arsenic and lead) and for SVOC chemicals, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements, and each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS). For lead and petroleum hydrocarbons, generic direct-contact standards are the applicable standards. For arsenic, the applicable standard is the site-specific background of 25.8 mg/kg.

IA #9 – Chapel Area – Under Foundation Slab: For all metals (except arsenic and lead) and for SVOC chemicals, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements, and each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS). For lead and petroleum hydrocarbons, generic direct-contact standards are the applicable standards. For arsenic, the applicable standard is the site-specific background of 25.8 mg/kg.

IA #10 – Elevator Sump: For SVOC chemicals, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements, and each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS). For petroleum hydrocarbons, generic direct-contact standards are the applicable standards.

IA #11 – Imported Soils: For all metals (except arsenic and lead) and for SVOC chemicals, generic direct-contact standards have been adjusted in accordance with multi-chemical adjustment requirements, and each of these standards was verified to be no greater than the corresponding leach-based standard for each chemical as necessary to protect groundwater meeting unrestricted potable use standards (POGWMUPUS). For lead, the generic direct-contact standard is the applicable standards. For arsenic, the applicable standard is the site-specific background of 25.8 mg/kg.

#### **2.4 Determination of Compliance with Applicable Standards**

Remedial activities were required in four IAs in order to meet applicable standards: IA #4, Former On-Site USTs; IA #7, Tar Release Area; IA #8, Refuse Area; and IA #10, Elevator Sump. Remediation in each of these areas consisted of removal of affected soils and other materials for offsite disposal in permitted facilities. All applicable standards are now met, and

there is no need for additional engineering or institutional controls, nor for any Operation & Maintenance (O&M) Plan.

#### 2.4.1 Data Analysis

Table 8 from the Phase II Property Assessment Report presents a concise comparison of COCs in each IA to the corresponding applicable standards, and it is reproduced here. In addition to these standards, the Johnson and Ettinger Model (Version 3.1) was run to predict chemical concentrations resulting in indoor air based upon representative concentrations of volatile chemicals of concern in soils at the Property. The results of modeling exercise indicate that chemicals of concern do not pose an unacceptable risk via the vapor-inhalation pathway.

The SESOIL model was run to evaluate potential impacts on groundwater of all chemicals of concern for which generic leach-based standards are not published by Ohio EPA. The model indicates that no groundwater concentrations above UPUS are indicated to result from any of the site-specific applicable standards that have been set. All other concentrations in soil on the Property are below generic leach-based standards developed by Ohio EPA.

#### 2.4.2 Compliance with Generic Numerical Standards (GNS)

A comparison to the GNS was conducted for all chemicals of concern for all IAs on the Property, and multi-chemical adjustments were conducted to develop applicable standards for each of the chemicals to address the exposure pathways associated with direct-contact standards: dermal contact, ingestion, and inhalation of soil particulate.

#### 2.4.3 Property-Specific Risk Assessment Findings

A partial risk assessment was performed to evaluate potential impacts to human health by volatile chemicals of concern as they migrate into the indoor air within potential residential structures at the Property. The Johnson and Ettinger Model (Version 3.1) was used to assess the risk to residents from the presence of organics detected in the subsurface soils of the subject Property. The results of the model were used to develop a risk contribution to augment the multi-chemical adjustment for the direct-contact pathway. The resulting aggregate carcinogenic risk in all Identified Areas is below the target of  $10^{-5}$ , and the resulting aggregate hazard quotient (non-carcinogenic risk) does not exceed 1, to one significant figure.

#### 2.4.4 Determination of Whether Remedial Activities are Required

Remediation was conducted as discussed below.

#### **2.5 Remedial Activities**

In addition to asbestos abatement conducted in the on-Property building (gymnasium/chapel) prior to its demolition, affected soils were removed from the following IAs to offsite disposal: IA #4 (Former On-Property UST Area), IA #7 (Tar Release Area), IA #8 (Refuse Area), and IA #10 (Elevator Sump Area). Confirmation samples were collected in each of these areas to demonstrate that applicable standards were met. No other remedial actions were conducted or were required to meet the VAP applicable standards.

#### **2.6 Planned Remedies**

No further remediation is planned.

### 3.0 CONCLUSIONS

The Property currently meets all applicable standards for unrestricted residential land use. Points of compliance extend to the property line and 10 feet below surface. Soil was removed from the Property in locations where and as necessary, and this remedy is protective of public health and safety and the environment.



If additional information regarding the property or the voluntary action is required, I suggest you first contact Jeffrey P. Hullinger, the certified professional for the property, at (614) 467-9252. In the alternative, you can contact Ray Moreno with the Ohio Environmental Protection Agency at (614) 728-3833.

c: Gary Guglielmi, City of Columbus, Dept. of Development  
Jeffrey P. Hullinger, Certified Professional, Carnoustie Consulting, Ltd.  
Clarence E. Mingo II, Franklin County Auditor  
Tiffani Kavalec, Manager, Ohio EPA, DERR/ACRE  
Ann Fischbein, Ohio EPA, Legal  
DERR/CO - CDO Files (#09NFA359)



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NASHVILLE, TN. • PITTSBURGH, PA. • ST. LOUIS, MO.

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**DESCRIPTION OF A 20.098 ACRE TRACT LOCATED  
NORTH OF WEST BROAD STREET,  
EAST OF WHEATLAND AVENUE,  
CITY OF COLUMBUS, OHIO**

Situated in the State of Ohio, County of Franklin, City of Columbus, in Virginia Military Survey 2268, being all of a 20.098 acre tract (Parcel 1) conveyed to the City of Columbus, by deed of record in Instrument Number 200307020202150, all records herein are from the Recorder's Office, Franklin County, Ohio, said 20.098 acre tract being more particularly described as follows:

**BEGINNING FOR REFERENCE** at a found iron pin at the intersection of the northerly right-of-way of West Broad Street ( 80' R/W) and the easterly right-of-way of Wheatland Avenue (40' R/W), being at the southwest corner of a 0.494 acre tract (Parcel 1) conveyed to the City of Columbus, by deed of record in Official Record 19320, Page E14.

Thence North 08°21'03" West, a distance of 502.10 feet, along the easterly right-of-way of said Wheatland Avenue, the westerly line of said 0.494 acre tract, and the westerly line of a 0.865 acre tract (Parcel 2) conveyed to the City of Columbus, by deed of record in Official Record 19320, Page E14, and the westerly line of a 2.410 acre tract (Parcel 2) conveyed to the City of Columbus, by deed of record in Instrument Number 200307020202150, passing a found iron pin at the northwest corner of said 0.865 acre tract and the southwest corner of said 2.410 acre tract at a distance of 251.05 feet, to a set iron pin at the northwest corner of said 2.410 acre tract and the southwest corner of said 20.098 acre tract, being the **TRUE POINT OF BEGINNING**.

Thence North 08°21'03" West, a distance of 1810.12 feet, along the westerly lines of said 20.098 acre tract, and the easterly right-of-way of said Wheatland Avenue, to a set iron pipe at the northwest corner of said 20.098 acre tract;

Thence the following three (3) courses and distances along the northerly lines of said 20.098 acre tract:

1. North 78°11'34" East, a distance of 108.55 feet, to a set iron pipe;
2. North 86°10'43" East, a distance of 273.91 feet, to a set iron pipe;

3. North 89°53'49" East, a distance of 111.16 feet, to a set iron pipe at the northeast corner of said 20.098 acre tract;

Thence the following two (2) courses and distances along the easterly lines of said 20.098 acre tract and said 2.410 acre tract:

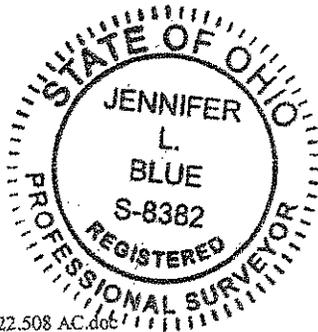
1. South 08°21'04" East, a distance of 1121.50 feet, to a found iron pin0;
2. South 03°15'38" East, a distance of 699.77 feet, to a set iron pipe at the southeast corner of said 20.098 acre tract and the northeast corner of said 2.410 acre tract;

Thence South 86°53'44" West, a distance of 431.14 feet, along a common line of said 20.098 acre tract and said 2.410 acre tract, to the **TRUE POINT OF BEGINNING**, containing 20.098 acres, more or less. Being subject to all easements, restrictions, and right-of-ways of record.

This description was based on record information from the Franklin County Recorder's Office in November 2008.

The bearings are based on the northerly right-of-way of West Broad Street as being North 08°21'03" West for the centerline of Wheatland Avenue, per Franklin County Monuments.

All iron pipes set are 1 inch in diameter by 30 inches in length with an I.D. cap bearing the name "CEC PROP COR".



Civil & Environmental Consultants, Inc.

  
Jennifer L. Blue                      2-26-09  
Date  
Registered Surveyor No. S-8382

**SUBMITTAL & REVISION RECORD**

NO	DATE	DESCRIPTION
△		

**LEGEND**

- = SET IRON PIPE, 1" DIAMETER, 30" LONG, WITH AN I.D. CAP STAMPED "CEC PROP COR".
- = FOUND IRON PIN, WITH NO CAP

**SITUATE**

SITUATE IN THE STATE OF OHIO, COUNTY OF FRANKLIN, CITY OF COLUMBUS, AND BEING IN VIRGINIA MILITARY SURVEY 2668.

**BASIS OF BEARINGS**

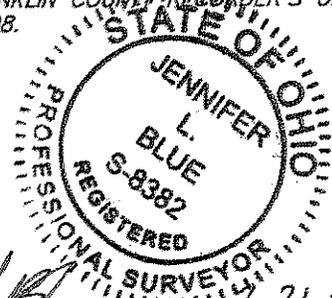
BEARINGS ARE BASED ON THE NORTHERLY RIGHT-OF-WAY OF WEST BROAD STREET AS BEING NORTH 08°21'03" WEST PER FRANKLIN COUNTY GPS OBSERVATIONS

**BOUNDARY SURVEY NOTE**

THIS PLAT CONSTITUTES A BOUNDARY SURVEY AS SET FORTH IN THE MINIMUM STANDARDS FOR BOUNDARY SURVEYING IN THE STATE OF OHIO, ADMINISTRATIVE CODE CHAPTER 4733-37 AND PROMULGATED BY THE BOARD OF REGISTRATION FOR PROFESSIONAL ENGINEERS AND SURVEYORS OF THE STATE OF OHIO PURSUANT TO CHAPTER 4733.

**SURVEYOR'S CERTIFICATE**

THIS EXHIBIT WAS BASED ON RECORD INFORMATION FROM THE FRANKLIN COUNTY RECORDER'S OFFICE IN NOVEMBER 2008.



JENNIFER L. BLUE P.S. 8382 DATE



**Civil & Environmental Consultants, Inc.**

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**BOUNDARY SURVEY OF 20.098 ACRES  
 NORTH OF WEST BROAD STREET  
 EAST OF WHEATLAND AVENUE**

Situate in  
**CITY OF COLUMBUS  
 FRANKLIN COUNTY, OHIO**  
 Made For  
**THE CITY OF COLUMBUS  
 WHEATLAND AVENUE PHASE II  
 COLUMBUS, OHIO**

DATE:	FEB. 26, 2009	SCALE:	1"=300'	DRAWING NO.:	
DRAWN BY:	JSC	CHECKED BY:	JLB	<b>BNDY</b>	
PROJECT NO.:	052-398	APPROVED BY:	JLB		SHEET 1 OF 1

