



State of Ohio Environmental Protection Agency

Don To Her

STREET ADDRESS:

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122 S. Front Street
Columbus, Ohio 43215

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

March 5, 2001

RECEIVED
MAR 08 2001
OHIO EPA/CDS

CERTIFIED MAIL

Mr. Bennie E. Golden
Custom Cleaners, Inc.
500 North Cassady Avenue
Columbus, OH 43209

and

Ms. Louise M. Bethel
13625 Cobblestone Road
Pickerington, OH 43147

**RE: Issuance of Covenant Not To Sue for the Custom Cleaners Property
01NFA108**

Dear Mr. Golden and Ms. Bethel:

I am pleased to inform you that on March 5, 2001, the Director of the Ohio Environmental Protection Agency ("Director") issued a Covenant Not To Sue ("Covenant") to Bennie E. Golden and Louise M. Bethel for the former Custom Cleaners property located at 500 North Cassady Avenue, Columbus, Ohio. The Covenant was issued as Final Findings and Orders pursuant to Ohio Revised Code ("ORC") Chapter 3746 and Ohio Administrative Code ("OAC") Chapter 3745-300. You will find the certified copy of the Covenant enclosed.

Upon the issuance of these Findings and Orders, and subject to the conditions outlined in the Covenant, Ohio EPA covenants not to sue and releases Bennie E. Golden and Louise M. Bethel and their agents, employees, shareholders, 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 at the property for the releases of hazardous substances or petroleum identified in the Phase I and Phase II Property Assessments completed in accordance with ORC Chapter 3746 and OAC Chapter 3745-300.

The issuance of the Covenant is a final action of the Director and will be public noticed in

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

Mr. Bennie E. Golden and Ms. Louise M. Bethel
Custom Cleaners Property
Page 2

accordance with OAC 3745-47-07. The action may be appealed to the Environmental Review Appeals Commission ("Commission"). 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 thirty (30) days after notice or issuance of the action. (See ORC 3745.04 and 3745.07.) A copy of the appeal must be served on the Director within three (3) days after the appeal is filed with the Commission. The appeal may be filed with the Commission at 236 East Town Street, Room 300, Columbus, Ohio 43215.

You and many parties within Smalley & Associates, Inc. and the agency worked hard to remove the environmental barriers associated with redeveloping this property. Again, congratulations on the issuance of this Covenant. If you have any questions or concerns, please feel free to contact me at (614) 644-2285.

Sincerely,



Amy Yersavich, Manager
Division of Emergency and Remedial Response
Voluntary Action Program

Enclosure

cc: Atul Pandey, CP, Smalley & Associates, Inc.
Dan Tjoelker, DERR, CDO
Sue Kroeger, Legal Office
CO DERR-VAP Files

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the matter of:

Bennie E. Golden
Custom Cleaners, Inc.
500 North Cassady Avenue
Columbus, OH 43209

Covenant Not to Sue

Director's Final Findings
and Orders

and

Louise M. Bethel
13625 Cobblestone Road
Pickerington, OH 43147

Regarding property known as:

The Custom Cleaners Property
500 North Cassady Avenue
Columbus, OH 43209

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

1. A No Further Action Letter, No. 01NFA108 (the "NFA Letter"), was issued on January 15, 2001 and submitted on January 16, 2001 to the Ohio Environmental Protection Agency ("Ohio EPA"), Division of Emergency and Remedial Response, Voluntary Action Program ("VAP") on behalf of Bennie E. Golden and Louise M. Bethel (the "Volunteers"), by Atul Pandey, a certified professional, No. CP224, as defined in ORC 3746.01(E) and OAC 3745-300-01(A)(8) (the "Certified Professional").
2. The NFA Letter describes investigational and remedial activities undertaken at the approximately 0.303 acre property, currently known as the Custom Cleaners Property, located at 500 North Cassady Avenue, Bexley, Franklin County, Ohio (the "Property"). An exact legal description of the Property is attached hereto as Exhibit

I certify this to be a true and correct copy of the
 original as filed with the Ohio
 Environmental Protection Agency
 By Atul Pandey 3/5/01

1. A site location map is attached hereto as Exhibit 2. The NFA Letter includes an Executive Summary, which is attached hereto as Exhibit 3.
3. Based upon the information contained in the NFA Letter, the following investigational and remedial activities were undertaken and completed regarding the Property:
 - a. a Phase I Property Assessment, in accordance with OAC 3745-300-06, to determine whether there is any reason to believe that a release of hazardous substances or petroleum has or may have occurred on or underlying, or is emanating from, the Property;
 - b. a Phase II Property Assessment, in accordance with OAC 3745-300-07, including but not limited to investigations of identified areas of concern and affected media, to assess environmental conditions related to any release of hazardous substances and petroleum; and
 - c. a demonstration of compliance with applicable standards has been achieved through the use of generic direct contact standards in accordance with OAC 3745-300-08 and a Property-specific risk assessment in accordance with OAC 3745-300-09.
4. The Certified Professional has verified by affidavit that the investigational and remedial activities undertaken at the Property comply with the applicable standards established in ORC Chapter 3746 and OAC Chapter 3745-300, that the Property is eligible to receive a Covenant Not to Sue under the VAP, and that the voluntary action was conducted in compliance with all applicable federal, state and local laws and regulations.
5. At the time that analyses were performed, Blackhand Laboratory, Lancaster, Ohio was a certified laboratory, No. CL0064, as defined in ORC 3746.01(D) and OAC 3745-300-01(A)(7), whose services were used in support of the NFA Letter for the Property (the "Certified Laboratory").
6. According to information provided by the Certified Laboratory in affidavits contained in the NFA Letter, the Certified Laboratory performed analyses for which it was certified, pursuant to ORC Chapter 3746 and OAC Chapter 3745-300, that formed the basis for the issuance of the NFA Letter by the Certified Professional.
7. Based on the information contained in the NFA Letter, and upon all other conditions set forth in these Findings and Orders, the Property meets the applicable standards contained in ORC Chapter 3746 and OAC Chapter 3745-300 for residential land use and unrestricted potable ground water use, including but not limited to:

- a. residential land use category direct contact soil standards for hazardous substances in accordance with Table II of OAC 3745-300-08 for generic numerical standards, at a point of compliance from the surface to a depth of 10 feet;
 - b. unrestricted potable use ground water standards, in accordance with Table VII of OAC 3745-300-08 for generic numerical standards and OAC 3745-300-09 for those standards derived through Property-specific risk assessment procedures, at all points underlying the Property;
 - c. soil standards derived through Property-specific risk assessment procedures in accordance with OAC 3745-300-09 to satisfy the requirements in OAC 3745-300-10(E) to ensure the protection of ground water meeting unrestricted potable use standards in the uppermost, unconsolidated regional ground water zone, at all points underlying the Property;
 - d. soil standards derived through Property-specific risk assessment procedures in accordance with OAC 3745-300-09 to satisfy the requirements of OAC 3745-300-10(F) to prevent leaching to ground water from on-Property sources or source areas which would result in an exceedance of the unrestricted potable use standards in the uppermost, unconsolidated regional ground water zone, at all points underlying the Property; and
 - e. soil standards based on construction worker exposure and vapor migration to indoor air derived through Property-specific risk assessment procedures in accordance with OAC 3745-300-09 for human receptor exposures not related to direct contact with soils, at a point of compliance from the surface to a depth of 10 feet.
8. Based on the information contained in the NFA Letter, and subject to all conditions set forth in these Findings and Orders, the Property is eligible to receive a covenant not to sue in accordance with ORC 3746.12(A) and the voluntary action for the Property is protective of public health and safety and the environment.

ORDERS

Covenant

1. Upon the issuance of these Findings and Orders, and subject to the conditions set forth herein, Ohio EPA hereby covenants not to sue and releases Bennie E. Golden and Louise M. Bethel, and their agents, employees, shareholders, 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 at the Property for the releases of hazardous substances or petroleum identified in the Phase I and Phase II Property Assessments completed in accordance with ORC Chapter 3746 and OAC Chapter 3745-300.

Conditions and Limitations

2. The Covenant provided in Order No. 1 shall only apply to the approximately 0.303 acre Property described in these Findings and Orders, the NFA Letter and the Exhibits attached hereto, upon which the investigational and remedial activities specified in the NFA Letter were conducted.
3. Pursuant to ORC 3746.12(B), 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.
4. Pursuant to ORC 3746.21 and 3746.171, authorized representatives of the Director shall be granted access to the Property for inspection or investigation purposes, including but not limited to determining whether the Property is being used in compliance with the use restrictions contained in the Declaration.
5. The Covenant shall not apply to releases of hazardous substances or petroleum:
 - a. that occur after the issuance of the NFA Letter to the Volunteer;
 - b. on or emanating from the Property, that are not described in the NFA Letter;
or
 - c. for which investigational or remedial activities were conducted that were not in compliance with ORC Chapter 3746 or OAC Chapter 3745-300.
6. The Covenant shall not apply:
 - a. to claims for natural resource damages the State may have pursuant to

Custom Cleaners Property
Director's Final Findings and Orders / Covenant Not to Sue

Exhibit 1
Legal Description

2740 East Main Street
Bexley, Ohio 43209-2577
(614) 235-8677
Telefax 235-4559

December 20, 2000

Legal Description 0.303 Acres

Situated in the State of Ohio, County of Franklin, City of Columbus, being Lot 526, 527 and part of Lot 528 of Bellwood Addition, the same as numbered and delineated upon the record plat of record in Plat Book 6, Page 16. Recorder's Office, Franklin County, Ohio and being more particularly described as follows:

Beginning at an iron pipe found at the intersection of the south line of Allegheny Street (60 feet wide) with the east line of North Cassady Avenue (60 feet wide), said iron pipe also being the northwest corner of said Lot 526;

Thence, along the north line of said Lot 526, the south line of said Allegheny Street, South 85 degrees 50 minutes 00 seconds East, 120.00 feet to an iron pipe found at the northeast corner of said Lot 526, and being the intersection of the south line of said Allegheny Street with the west line of a 20 foot alley;

Thence, along the west line of said 20 foot alley, the east line of Lot 526 and Lot 527, and part of the east line of said Lot 528, South 04 degrees 12 minutes 00 seconds West, 110.00 feet to an iron pipe found;

Thence, across said Lot 528, North 85 degrees 50 minutes 00 seconds West, 120.00 feet to an iron pipe found in the east line of said North Cassady Avenue;

Thence, along the east line of said North Cassady Avenue, part of the west line of said Lot 528, the west line of said Lot 527 and Lot 526, North 04 degrees 12 minutes 00 seconds East, 110.00 feet to the place of beginning **CONTAINING 0.303 ACRES.**

The foregoing description was prepared from actual field measurements in December 2000 by Myers Surveying Company, Inc. and is subject to all legal highways, easements, leases, restrictions of record and of records in the respective utility offices. Iron pins set are 30" X 1" O.D. with an orange plastic cap inscribed "P.S.6579", unless otherwise noted. Basis of bearings is the south line of Allegheny Street held as South 85 degrees 50 minutes 00 seconds East as per Plat Book 6, Page 16.

MYERS SURVEYING COMPANY, INC.



Albert J. Myers, P.S. #6579
REH/kmh (18120672)

Myers Surveying Company, Inc.

2740 East Main Street, Columbus 43209 (Bexley), Ohio
 614-235-8677 FAX: 614-235-4559

A Boundary Survey prepared for and certified to:
Commercial One Realtors

Legal Description: Situated in Ohio, County of Franklin, City of Columbus. Being Lots 526 and 527 and part of Lot 528
 Bellwood Addition, Plat Book 6 Page 16

Applicant:

Posted Address: 500 & 508 N. Cassady Avenue, Columbus, Ohio



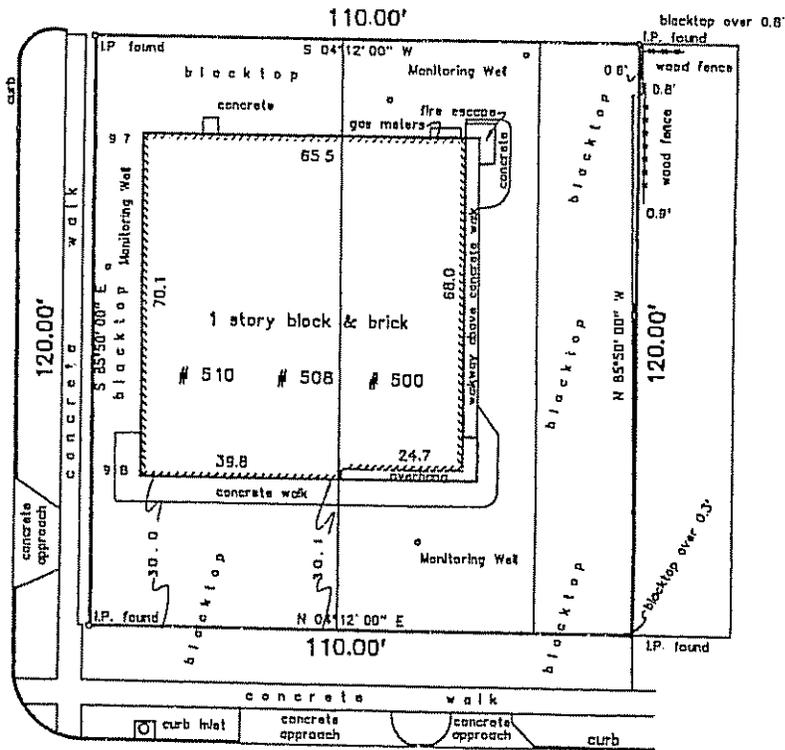
Scale: 1" = 30'

Date: 12-20-2000



20' ALLEY

ALLEGHENY STREET 60'



N. CASSADY AVENUE 60'

We hereby certify that the foregoing Boundary Survey was prepared from actual field measurements in accordance with Chapter 4733-37 Ohio Administrative Code. Iron pins set are 30"x1" (1) D. with an orange plastic plug inscribed "P.S. 6579", unless otherwise noted. Basis of bearing is south line of Allegheny Street held as South 85 degrees 50 minutes (00) seconds East as per Plat Book 6 Page 16

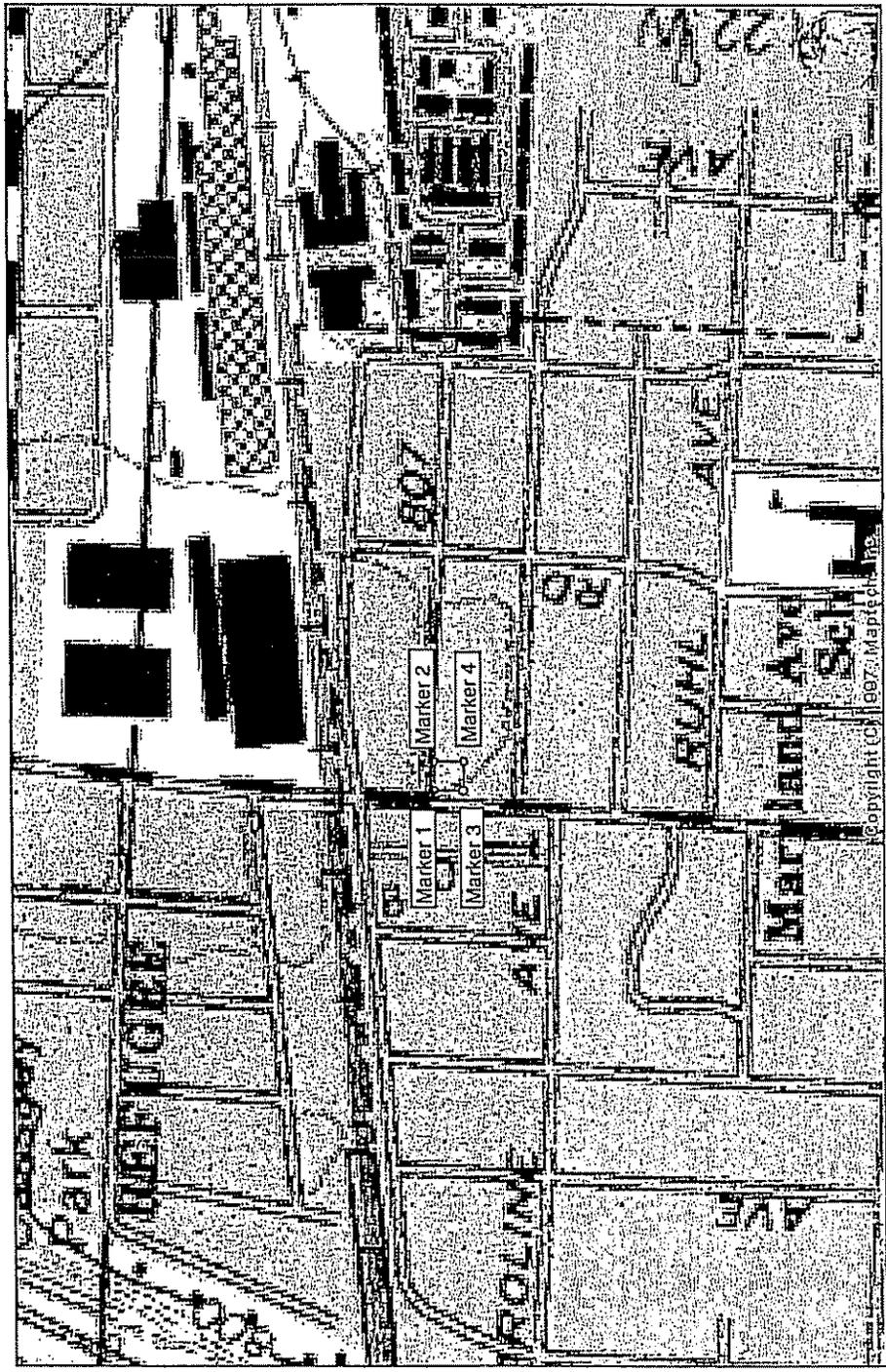
Myers Surveying Co., Inc.

By *Albert J. Myers*
 Professional Surveyor

Myers Order No. - 18-12/06/00	Rec.	Field 76	DWG 76	Ltr. 76	CK.
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Custom Cleaners Property
Director's Final Findings and Orders / Covenant Not to Sue

Exhibit 2
Site Map



Marker	Latitude Coordinate	Longitude Coordinate
1	039° 58' 51.38" N	082° 55' 55.53" W
2	039° 58' 51.38" N	082° 55' 54.08" W
3	039° 58' 51.01" N	082° 55' 55.69" W
4	039° 58' 51.01" N	082° 55' 55.08" W

Figure 1
 Property Location Map
 Southeast Columbus, OH
 Rev. 1994

The above map and coordinates were obtained from a computer program (MapTech TopoScout Version 2.01) which uses digitized images of USGS 7.5 min. quads. The above map is of the 1994 Southeast Columbus, OH quadrangle. Smalley & Associates, Inc. makes no warranty as to the accuracy of this program or to the precision of the markers that Smalley & Associates, Inc placed on this map.

Custom Cleaners Property
Director's Final Findings and Orders / Covenant Not to Sue

Exhibit 3
Executive Summary

1.0 Introduction

A No Further Action (NFA) Letter was submitted to the Ohio Environmental Protection Agency (Ohio EPA), Division of Emergency and Remedial Response (DERR) Voluntary Action Program (VAP) on behalf of Mr. Bennie E. Golden, President, Custom Cleaners, Inc. and Ms. Louise M. Bethel on January 15, 2001, by Atul Pandey, P.E. of Smalley & Associates, Inc., CP #224. The NFA letter is dated January 5, 2001.

The NFA describes the Phase I Property Assessment and Phase II Property Assessment for the 0.3 acres of land located at 500, 508, and 510 North Cassady Avenue in Columbus, Ohio 43209. The subject property is referred to as the "Custom Cleaners Property".

This executive summary of the NFA has been prepared to meet the requirements of Ohio Revised Code (ORC Chapter 3746). A complete copy of the NFA Letter is on file and will be available from the Ohio EPA, Division of Emergency and Remedial Response, Voluntary Action Program in accordance with the filing requirements of OAC 3745-300-13(J).

The legal description of the 0.3 acres of land is provided in Exhibit A to this executive summary.

2.0 Summary of No Further Action Letter

The Certified Professional (Atul Pandey, P.E.) issued an NFA Letter based upon Phase I and Phase II property assessments for the subject property.

A summary of the assessments is provided below. Complete copies of the Phase I Property Assessment and Phase II Property Assessment are contained in the NFA Letter.

2.1 Phase I Property Assessment

A Phase I Property Assessment was conducted in November, 2000. A final Phase I Assessment Report was completed on November 15, 2000.

The Phase I Assessment included a determination of eligibility for entry into the Ohio VAP, a review of historic and current uses of the property and surrounding properties, and an environmental history review, a review of the history of hazardous substances or petroleum releases, a property inspection and identification of "identified areas" as defined in OAC 3745-300-06(F). A summary of the Phase I Property Assessment is as follows.

The property is located in the City of Bexley, County of Franklin, State of Ohio within the city corporation line. Currently there is one building on the subject property. The main floor of the 500 N. Cassady Ave. location serves as a drop-off and pick-up location for dry cleaning services. The upper floor of 500 N. Cassady contains four small one bedroom apartments. The Bexley Natural Market is located at 508 and 510 N. Cassady Ave. and contains a retail establishment on the sole main floor. The rest of the property is covered with asphalt and is used for parking.

The subject property lies on the east side of N. Cassady Ave. between Allegheny Ave. and Bellwood Ave.. To the north is a pharmacy and to the south is a beauty salon and a Dairy Mart Convenience Store. Across Cassady Ave. is a large apartment complex while the rear of the subject property borders residential housing. Water and sewer utilities on the subject property are municipal in nature. Heat to the building is provided by natural gas.

The information used to establish a continuous history of the subject property and its surroundings included deed and tax records, city directories, topographic maps, aerial photographs, and interviews.

A review of the environmental history of the site showed that hazardous substances were historically handled at the site. Although the subject property currently serves as a pick-up/drop-off location for drycleaning purposes, drycleaning operations were actually conducted at the property as late as late 70's. The owner of the property, Mr. Bennie E. Golden stated in an interview with SAI that filter materials and other residues from the drycleaning machines were discarded in a dumpster behind the main building at the subject property.

Hence, the former location of the drycleaning machine unit as well as the area around the location of the former trash dumpster was identified as the singular identified area at the subject property.

The Phase I Property Assessment concluded that a Phase II Property Assessment should be conducted to determine potential adverse impacts to soil and/or groundwater from historical drycleaning operations.

The Certified Professional determined that the property was eligible for entry into the Ohio VAP on November 1, 2000. The subject property or any portion thereof is not described by paragraphs (C)(1) through (C)(10) of OAC 3745-300-02. The Certified Professional inspected the subject property on November 1, 2000, to verify the Phase I findings.

2.2 Phase II Property Assessment

A Phase II Property Assessment was conducted over the period of November and December, 2000. The Phase II Assessment Report was issued on January 5, 2001. The purpose of the Phase II Assessment was to determine if soil and/or groundwater underneath the subject property was impacted in the identified area.

The Phase II Assessment included sampling and analysis of soil and groundwater at the subject property, a pathway completeness determination, determination of applicable standards, and an assessment of the risk from direct contact to the soils at the property. The complete Phase II Assessment Report is contained in the NFA on file with the Ohio EPA. A summary of the Phase II findings is provided below.

2.2.1 Soil Investigation and Findings

Soil was investigated by the placement of 11 soil bores. A total of 7 different potential chemicals of concern were detected at the property. These chemicals of concern were related to the common drycleaning solvent, Tetrachloroethene and other degradation products.

2.2.2 Groundwater Investigation and Findings

A silty sand aquifer was discovered beneath the subject property at depths ranging from 10 to 35 feet below surface grade. The unsaturated zone was found to be comprised primarily of silty clay and/or glacial till material. A total of three monitoring wells were advanced into this aquifer.

Groundwater samples were collected in the manner prescribed by Ohio VAP and analyzed for relevant chemicals of concern. Groundwater was not found to be impacted above federal or state action levels.

2.2.3 Exposure Pathway Assessment

An exposure pathway assessment was prepared to evaluate potentially exposed human receptors, current and future, and identify potential exposure pathways associated with the property. This assessment was developed in accordance with guidance in the Ohio VAP (OAC 3745-300-09). The preferred land use designation for the property is unrestricted or residential, as defined by OAC 3745-300-08(2)(C)(i). The following pathways were determined to be complete, and may or may not pose a risk to human health and/or the environment:

- Direct contact soils - on property
- Soil vapor intrusion to subsurface structures - on property
- Construction worker exposure scenario - on property
- Leaching of soil contaminants to groundwater

The results of groundwater sampling indicate that groundwater is not impacted in excess of VAP unrestricted portable use standards. The exposure pathway assessment demonstrated that the complete pathways of exposure from soil or groundwater under present or future land use scenarios would not pose an adverse risk to human health, safety, or the environment.

2.2.4 Determination of all Applicable Standards

A review of chemical concentrations detected in the soil indicated that the concentrations met generic direct contact standards for residential land use, cumulatively adjusted for presence of multiple chemicals, as found in OAC 3745-300-08. Because these standards were met, implementation of a remedy was not considered necessary. The aquifer was assumed to be a "critical resource aquifer," per the definition of such an aquifer as found in OAC 3745-300-10.

2.2.5 Determination of Spurious Concentrations

Four chemicals, namely 1,3-dichlorobenzene, 1,2-dichlorobenzene, 1,4-dichlorobenzene, and 1,2,4-trichlorobenzene, were screened out from consideration during risk assessment analysis. This was performed in accordance with Ohio EPA VAP Rule OAC 3745-300-09.

2.3 Determination of Risk from Soil Exposure Pathways

Risk from direct contact to soil was performed for soils in the 0 - 10 foot horizon, in accordance with residential land use guidelines. A cumulative adjustment was performed as outlined in OAC 3745-300-08. This analysis concluded that the subject property satisfies the direct contact to soils exposure pathway.

Risk from direct contact to deeper soils by a future construction worker and soil to indoor air volatilization scenario was satisfied through qualitative discussion.

2.4 Determination of Risk from Ground Water Exposure Pathways

No chemicals of concern were detected in groundwater at the subject property. The property satisfies an unrestricted potable groundwater use pathway. The concentration of chemicals of concern in groundwater were found to be below state or federal action levels.

2.5 Protection of Groundwater Meeting Unrestricted Potable Use Standards (POGWMUPUS) - Leaching to Groundwater from Soils Pathway

Chemicals of concern detected on-site in the unsaturated zone are not predicted to have an impact to the underlying groundwater in the shallow aquifer in excess of VAP unrestricted potable use standards. This was demonstrated in two stages. In the first stage, generic leach-based soil standards were computed for the subject property using the same approach as that utilized for generic inorganic leach-based soil standards by Ohio EPA VAP and presented in "Ohio EPA Derived Leach-Based Soil Values; Appendix Technical Support Document", OEPA:DERR:VAP, July 1996. This approach consisted of back calculating an acceptable soil concentration based on an acceptable ground water concentration, conservative (low) Kd, and an acceptable dilution factor.

The chemicals that failed stage I of the leaching analysis were addressed in the second stage of the leaching demonstration, which involved modeling the leaching of contaminants through the soil column at the subject property using the SESOIL[®] and SUMMERS analytical model.

Through these leaching analyses, it was demonstrated that chemicals of concern in the unsaturated zone will not have a future impact on underlying groundwater in the shallow aquifer in excess of VAP unrestricted potable use standards, and the pathway is satisfied.

3.0 Conclusion

The foregoing is a summary of the NFA Letter submitted for Mr. Bennie E. Golden, President, Custom Cleaners, Inc. and Ms. Louise M. Bethel by Atul Pandey, P.E. of Smalley & Associates, Inc., as Certified Professional (CP#224).

Mr. Pandey is the contact at Smalley & Associates, Inc. regarding questions of this NFA Letter. Mr. Pandey can be contacted at 740-654-0122.

A complete copy of the NFA Letter is on file with the Ohio EPA, Division of Emergency and Remedial Response, Voluntary Action Program. The NFA Letter will be made available by the Agency upon request. The number for the Ohio EPA, Division of Emergency and Remedial Response, Voluntary Action Program is 614-644-2924.

TO BE RECORDED IN DEED RECORDS,
PURSUANT TO R.C. 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 Zona L. Clements or Tonya R. Jackson, 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 March 5, 2001 regarding the property known as the Custom Cleaners Property, located at 500 North Cassady Avenue, Columbus, Franklin County, Ohio, and further described in Exhibit 1 of the attached Covenant Not to Sue.

Zona L. Clements
Zona L. Clements or Tonya R. Jackson
Records Management Officer
Ohio EPA Legal Office

Sworn to and subscribed before me, a Notary Public in and for the State of Ohio, this 5th day of March, 2001.



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

S. C. Kroeger
Notary Public
State of Ohio

Permanent Commission
No expiration, R.C. 147.03

This instrument prepared by:
Susan Kroeger, Attorney
Ohio EPA Legal Office
P.O. Box 1049
Columbus, Ohio 43216-1049