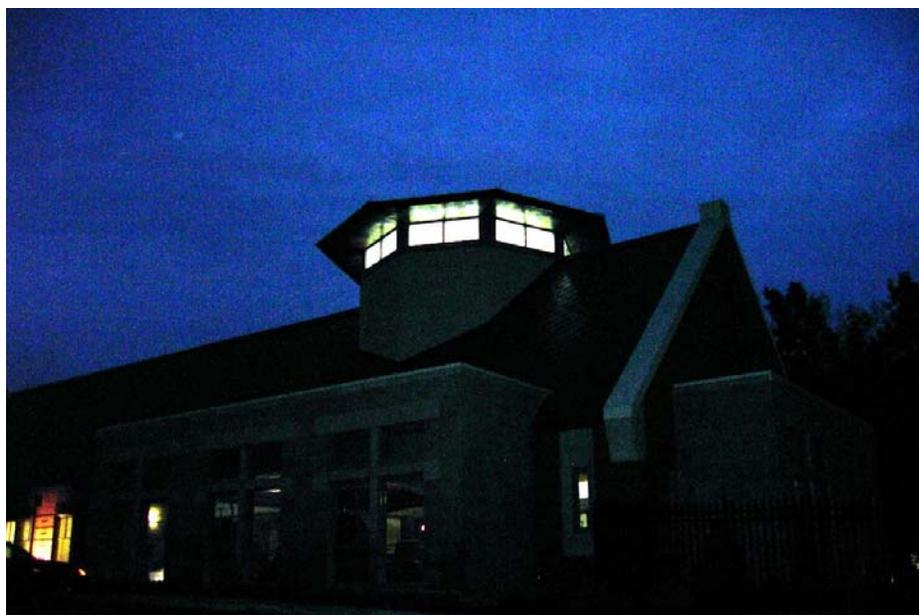


**Division of Emergency & Remedial Response**

**VOLUNTARY ACTION PROGRAM**

**ANNUAL REPORT**

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**July 2003 - June 2004**

Bob Taft, Governor  
Christopher Jones, Director

OHIO VOLUNTARY ACTION PROGRAM

ANNUAL REPORT  
TO THE  
OHIO LEGISLATURE

July 2003 - June 2004  
*Ohio Environmental Protection Agency*

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## **2003-2004 Voluntary Action Program Annual Report to the Legislature Introduction**

Ohio's Voluntary Action Program (VAP) was created in September 1994 and, with the adoption of rules, became fully implemented in early 1997. The program was created to allow companies a way to investigate possible environmental contamination, clean it up if necessary, and receive a promise from the State of Ohio (covenant not to sue or CNS) that no more cleanup is needed. Prior to the creation of this program, valuable land sat idle because fears of immense liability and cleanup costs scared off potential developers, businesses and banks. Some developers had abandoned plans to clean up their contaminated properties because Ohio EPA, which must focus its efforts on the worst sites, could not make those properties a priority. By creating this program, Ohio recognized the need to remove the environmental and legal barriers that stalled redevelopment and reuse of contaminated properties.

The program is getting sites cleaned up. Since the program was fully implemented, certified professionals (CPs) have issued 206 No Further Action (NFA) Letters for sites they have determined meet VAP standards. Of these, 143 have received a CNS. Of the remaining NFAs issued, 11 were denied a CNS, 17 were allowed to be withdrawn during the early years of the program, 10 were issued without requesting a CNS and 25 are pending review. (Note that some of the withdrawn or denied NFAs were resubmitted and issued a CNS.) During SFY'04, 27 sites received a CNS - some of which are highlighted in this report.

The VAP has been working toward improving the efficiency of NFA reviews over the past several years. This has culminated in the implementation of the VAP Timeline Project. This project specifically focused on how to meet VAP statutory review deadlines. The knowledge Ohio EPA has gained in almost seven years of project review experience was used to determine what causes project holdups. Based on this knowledge, which looks at time lags that happen on the Agency's end as well as the CP's end (when problems and deficiencies are found during NFA reviews), a Timeline Procedure was developed and implemented at the end of September 2003. The data collected from tracking the steps and roadblocks to reviewing the NFAs will be evaluated annually to continue to identify potential problems and improve the process.

This report provides an update of the program activities for state fiscal year 2004 (July 1, 2003 through June 30, 2004). Please contact the Ohio EPA Voluntary Action Program at (614) 644-2924 with questions.

## Urban Setting Designations

When developing the VAP regulations, Ohio EPA recognized that many brownfield properties are located in highly urbanized areas which rely on community water systems to supply residents with safe drinking water. In those areas, ground water that contains chemicals from prior industrial/commercial activities poses no appreciable risk to the community, because the ground water is not used and will not be used for drinking water in the foreseeable future. In these situations, an Urban Setting Designation (USD) may be appropriate. A USD recognizes that cleaning up the ground water to drinking water standards is not necessary because no one will drink the ground water. Other possible exposures to contaminated ground water (such as wildlife or streams in the area) still must be addressed when a USD is granted for an area.

Only the director of Ohio EPA can grant a USD. A certified professional must submit a written request for a USD to the director. The request must successfully demonstrate that the property (or properties) meets all the criteria of a USD as specified in Ohio Administrative Code (OAC) rule 3745-300-10(D) before the designation can be granted. All USD requests must be submitted and approved by the director prior to completion of an NFA letter which relies upon a USD for applicable ground water standards for a property. One Urban Setting Designation was approved during SFY'04.

### Summary of Urban Setting Designations Approved

USD NAME AND LOCATION	USD NUMBER	ACRES	APPROVAL DATE
National Gypsum 504 Walnut Street Niles, Trumbull County	01USD020	12	11/03/2003

Files relating to this Urban Setting Designation are available for review at Ohio EPA's Northeast District Office by contacting the records management officer at (330) 963-1200.

## 27 Properties Receive Covenants Not to Sue

During SFY'04, Ohio EPA issued 27 covenants not to sue. Following are some examples of sites that received a covenant not to sue (CNS).

### Former Swan Cleaners - Columbus



*The former Swan Cleaners occupied the location of the current Avenue store (center).*

Graceland Shopping Center opened in Columbus in 1954, and Swan Cleaners operated at a 0.625-acre location in the shopping center from 1954 until 1993. After 1993, the store ceased dry cleaning and became a customer drop off and pickup location only. Additional retail establishments occupied the property after 1998. The property and the shopping center are presently being redeveloped for new retail uses.

The property was evaluated for the presence of volatile organic compounds, primarily the dry cleaning chemical tetrachloroethane (PCE), in the soil and groundwater. The property meets soil standards for residential land uses. In order to meet ground water standards, a restriction against extracting ground water has been put in place at the site, except for investigation of the ground water or construction and maintenance activities.

### Former Bayley Company Property - Springfield

The site of the former Bayley Company in Springfield was the first Memorandum of Agreement (MOA) track site to receive a covenant not to sue from Ohio EPA. (See details regarding the MOA track later in this report.) Because it is publicly owned, this site also was among the first in Ohio to receive assistance from Ohio EPA for conducting some of the sampling that was required for the site investigation. This saved the city money that it put toward the cleanup of the site.



*The Springfield Regional Cancer Center.*

The property was originally developed as a manufacturing facility in the late 1800s, and was purchased by William Bayley, who was considered an icon of Springfield's industrial revolution. The William Bayley Company closed in the mid 1980s, at which time the property was purchased and used for various manufacturing, retail and warehouse uses.

Community Hospital and Mercy Health Partners-Western Ohio developed the Miami Valley's newest state-of-the-art oncology clinic at the site overlooking the Springfield Museum of Art. The facility is 22,000 square feet and unites the treatment programs of the city's two hospitals. The downtown location of the center adds convenience for all treatment services. The center is located along the cliffs of the Buck Creek corridor, adjacent to green space and with a view into Veterans Park. The redevelopment agreement between the hospitals and the city will breathe new life into a historically significant downtown site.

### **GOJO Building - Akron**



*GOJO Building*

The GOJO Building is located at 600 South Main Street, Akron, a densely urbanized area of downtown. The 6.5-acre property has been owned by the City of Akron since 1986 and contains an office building and parking area, and adjacent lawn areas. The City's sale agreement with GOJO Industries required the city to pursue a covenant not to sue.

Prior to 1968, the property had been used primarily for residential and commercial purposes, such as stores, restaurants and hotels. However, the site was tested for possible contamination from previously operating auto and electrical repair shops and manufacturing complex which bordered the property. The chemicals of concern from historical use were metals, volatile and semi-volatile organic compounds, and total petroleum hydrocarbons. The results of sampling and modeling showed that the property meets standards for industrial and commercial use. A deed restriction was placed on the property to limit its use to industrial and commercial uses and to prohibit the extraction of ground water.

### **Former Johnson Controls Property - Mansfield**

The approximately 8.4-acre property is located at 20-40 South Airport Road, Mansfield, and is currently owned by Crane Plumbing, who uses the two buildings on site for packaging, storing and distributing the company's ceramic plumbing products. Previously, the buildings had been used by two industrial facilities for plastic molding and chrome plating.



*Buildings currently in use by Crane Plumbing.*

Seven areas were identified with potential contamination due to the industrial processes conducted at the two facilities, the locations of

underground storage tanks, surface lagoons and drainage ditches, and a possible transformer spill. The results of sampling and modeling indicated that standards could be met through the implementation of use restrictions. The property is restricted to commercial or industrial activities only, and the use restriction includes a prohibition against extraction of ground water.

### Western Parcel, Former ALSCO Aluminum - Gnadenhutten



*The property will be developed for recreational purposes.*

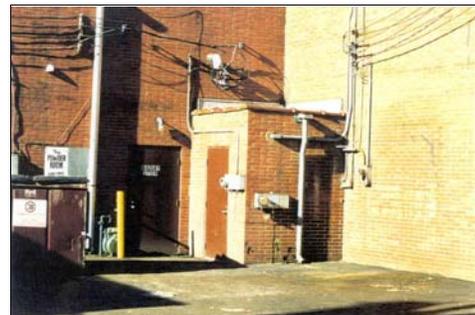
The 3.2-acre property was formerly used by AlSCO Aluminum for the fabrication of aluminum siding and related products. The company operated from the 1950s to 1993. The western parcel was not part of the former U.S. EPA National Priorities List site which consisted primarily of wastewater lagoons that were used to treat wastewater from the plant operations. These lagoons have subsequently been excavated.

The property is currently a vacant parking lot, although the future use of the site is for recreational purposes and as a green space. The property is restricted to commercial and industrial use and a prohibition on extracting ground water has been put in place.

### D. O. Summers Company - Woodmere

The location of the former D. O. Summers Company was undeveloped until 1961, at which time a commercial strip mall was constructed, which included a cleaners. The company leased the property from 1963 until 1981. The property is currently part of a T J Maxx department store.

Soils containing volatile organic compounds were removed and the property is restricted to commercial use. In addition, there is a ground water use restriction, and the construction of basements and other subsurface structures is not allowed. The size of the property is very small, at .09 acres.



*The property is currently part of T J Maxx department store.*

## Lake County Garage, Former - Painesville Twp



*No structures from the maintenance garage remain on site.*

The 3.5-acre property was an undeveloped part of the Lake County Infirmity from 1874 until 1915. The county then leased the property to the state beginning in 1928 until 1993 for use as a maintenance garage. Currently there are no structures or pavement on the property, which consists primarily of shrubbery and mature trees.

Remediation consisted of removal of limited amounts of soil to remove the possibility of metals, volatile organic compounds and polyaromatic hydrocarbons contaminating the ground water in the future. The property is restricted to commercial and industrial use.

### Summary of Covenants Not to Sue Issued

PROPERTY NAME, ADDRESS	NFA NUMBER	VOLUNTEER NAME	DATE SUBMITTED	DATE ISSUED	CP
D. O. Summers Co. 27159 Chagrin Blvd. Woodmere, Cuyahoga Co.	98NFA031	D. O. Summers Co.	8/3/98	8/6/03	Craig Kasper (CP 103)
Lake County Garage, Former 410 Riverside Drive Painesville TWP, Lake Co.	03NFA158	ODOT, District 12	1/14/03	8/6/03	Matthew Knecht (CP 105)
Baxter Pharmaseal Div. Cincinnati Plant 5500 Muddy Creek Road Cincinnati, Hamilton Co.	01NFA111	Muddy Creek Land Co., Ltd.	4/3/01	8/7/03	John Payne (CP104)
Ford Motor Company Forge Plant Canton 3707 Georgetown Road Canton, Stark Co.	02NFA143	City of Canton	9/23/02	8/7/03	William Rish (CP140)
Collinwood Parcels C1 & C3 577 East 152 <sup>nd</sup> Street Cleveland, Cuyahoga Co.	03NFA168	Collinwood Properties Co. LLC	6/23/03	8/18/03	William Rish (CP140)
Collinwood Parcel C2 577 East 152 <sup>nd</sup> Street Cleveland, Cuyahoga Co.	03NFA169	Collinwood Properties Co. LLC	6/23/03	8/18/03	William Rish (CP140)

PROPERTY NAME, ADDRESS	NFA NUMBER	VOLUNTEER NAME	DATE SUBMITTED	DATE ISSUED	CP
Chevron Texaco Toledo Refinery Areas 3 & 6 2935 Front Street Toledo, Lucas Co.	01NFA117	Chevron U.S.A., Inc.	5/25/01	9/17/03	James Burns (CP145)
Black & Decker Air Tool Div. 6225 Cochran Road Solon, Cuyahoga Co.	02NFA145	Kadee Metalfab, Inc.	10/8/02	10/30/03	Thomas Shalala (CP188)
Bayley Property, Former 148 West North Street Springfield, Clark Co.	03NFA175	City of Springfield	10/8/03	11/6/03	Craig Kasper (CP103)
Western Parcel, Former ALSCO Aluminum One Anaconda Drive Gnadenhutten, Tuscarawas Co.	02NFA142	Atlantic Richfield Co.	9/17/02	11/10/03	Oren Gottlieb (CP123)
Metal Management Inc. 18899 Snow Road Brook Park, Cuyahoga Co.	03NFA162	CP Snow Properties, LLC	3/21/03	12/11/03	Keith Egan (CP159)
Wellsville 421 Main Street Wellsville, Columbiana Co.	03NFA176	Village of Wellsville	10/16/03	12/11/03	Matthew Knecht (CP105)
Deluxe Engraving 443, 446 & 447 Morgan St. & 2336 Iowa St. Cincinnati, Hamilton Co.	02NFA137	JJES	7/11/02	12/18/03	John Payne (CP104)
Copeland Corp. Property 751 Industrial Drive Wapakoneta, Auglaize Co.	03NFA166	Copeland Corporation	6/3/03	1/2/04	John Simon (CP152)
366-370 West Kemper Road Springdale, Hamilton Co.	02NFA133	City of Springdale	4/24/02	1/27/04	Lawrence Graves (CP163)
M-S Company Property 100 North West Street Norwalk, Huron Co.	03NFA170	M-S Company	6/30/03	2/23/04	Ronald Clark (CP101)
Crane Plumbingware 14909 Gaskill Drive NE Alliance, Stark Co.	00NFA080	CR/PL, LLC	1/20/00	2/24/04	Lawrence Graves (CP163)
Miami-Carey, Former 203 Garver Road Monroe, Butler Co.	98NFA032	Mr. Martin Clifford	8/4/98	2/26/04	Walter Kosinski (CP196)

PROPERTY NAME, ADDRESS	NFA NUMBER	VOLUNTEER NAME	DATE SUBMITTED	DATE ISSUED	CP
Ridge Plaza Property 5375 & 5405 Ridge Avenue Cincinnati, Hamilton Co.	03NFA159	GC Acquisition Corp	1/14/03	4/15/04	John Payne (CP104)
Halliburton Energy Services 5210 St. Rte. 46 Cortland, Trumbull Co.	98NFA030	Halliburton Energy Services	7/28/98	4/26/04	Ronald Clark (CP101)
Proposed Toledo Prison Site - Goose Hill Site #2 2001 East Central Avenue Toledo, Lucas Co.	99NFA055	City of Toledo	4/13/99	5/18/04	Michael Momenee (CP236)
GOJO Building 600 South Main Street Akron, Summit Co.	02NFA155	City of Akron	12/20/02	5/18/04	Ronald Clark (CP101)
Johnson Controls, Former 20-40 S. Airport Drive Mansfield, Richland Co.	03NFA165	City of Mansfield	5/5/03	5/18/04	Edward McCabe (CP102)
American Paper Group 8401 Southern Blvd. Boardman Twp., Mahoning Co.	02NFA146	American Paper Group - APCO Division	10/15/02	6/1/04	Guy Wilson (CP168)
Swan Cleaners, Former - Graceland Shopping Ctr. 55-63 Graceland Blvd. Columbus, Franklin Co.	04NFA181	Graceland Shoppers Limited Partnership	3/8/04	6/4/04	Bruce Savage (CP265)
Finishing Corp. Of America, Former 3770 Wilson Avenue Campbell, Mahoning Co.	04NFA179	City of Campbell	1/28/04	6/10/04	Jim Smith (CP121)
Sermatech-Lehr, Plants 2 & 3 11495 Deerfield Rd Blue Ash, Hamilton Co.	01NFA115	Sermatech- Lehr	5/3/01	6/21/04	Michael Weinstein (CP126)

## VAP Superfund Memorandum of Agreement Track

On July 31, 2001, Ohio EPA finalized and signed the Voluntary Action Program Memorandum of Agreement (MOA) with U.S. EPA. After many months of negotiations between U.S. EPA and Ohio EPA, an MOA-Track program was developed to incorporate public involvement and up-front oversight into the existing VAP process. Volunteers who follow this track of the VAP will obtain both a CNS from Ohio EPA and comfort that U.S. EPA will not require any additional cleanup at the site. The existing VAP process, known as the Classic VAP Track, is still available to volunteers who do not feel the need for federal comfort and prefer not to incorporate up-front Agency oversight or public involvement into the voluntary cleanup process.

VAP staff created procedures and documents to assist volunteers and certified professionals through a voluntary action that meets both the traditional VAP requirements and the additional public involvement and Ohio EPA review requirements for the MOA track. Detailed information about the VAP's MOA-Track process, including a copy of the MOA, can be found on the program Web page (under the section titled "Final Memorandum of Agreement - July 2001") at <http://www.epa.state.oh.us/derr/vap/moa/moa.html>.

Seven sites initiated the first step of the process, the notice of entry into the MOA track, in SFY'04. These properties are listed in the table below:

PROPERTY NAME AND ADDRESS	VOLUNTEER	DATE ENTERED MOA TRACK
D&H Manufacturing Facility, Former 1601 Sheridan Avenue Springfield, Clark Co.	City of Springfield	8/8/03
Penn-Michigan Manufacturing Corp. 220 North Kirk Street West Lafayette, Coshocton Co.	Village of West Lafayette	8/26/03
Broadview Center Revitalization 9543 Broadview Road Broadview Heights, Cuyahoga Co.	City of Broadview Heights	9/5/03
Cleveland Pneumatic Company 3781 East 77 <sup>th</sup> Street Cleveland, Cuyahoga Co.	General Investment Funds Real Estate Holding Company	9/15/03
Mosler, Inc. 1561 Grand Blvd. Hamilton, Butler Co.	Hamilton Brownfields Redevelopment, LLC	11/6/03
Royal China Property, Former 95 South 15 <sup>th</sup> Street Sebring, Mahoning Co.	Village of Sebring	4/12/04
IMC 3509 Middle Road Ashtabula, Ashtabula Co.	Ashta Chemical Inc.	5/4/04



## **Low-Interest Loans Issued to Properties Undergoing Voluntary Actions**

The Water Pollution Control Loan Fund (WPCLF) is administered by Ohio EPA's Division of Environmental and Financial Assistance. Any environmental investigation or remediation performed under the VAP rules that will result in water quality benefits to surface and/or ground water is eligible for WPCLF financing. This can include activities such as literature searches, site evaluation studies, sampling, monitoring, laboratory analyses and cleanup activities. The WPCLF will provide up to \$3 million to a project for these eligible activities. Private borrowers are limited to a maximum repayment term of 10 years so future development of cleaned up sites is not unduly subsidized. An application fee of 0.5 percent of the requested loan amount is charged to help defray the costs of the State's additional expenses necessary to complete financial and legal reviews.

An ongoing concern is the length of the time involved, not only to mutually agree upon sufficient sources of security and repayment, but to review and accept the documentation in support of those sources. For example, Ohio EPA may agree on a first mortgage on the property as security, then find the appraisal deficient or overly optimistic in its appraised value of the property. Ohio EPA is beginning to explore alternatives, which could include an interest buy-down arrangement with a private lender (relieving Ohio EPA of making credit judgements).

Of course, the most difficult situations are those that present serious and immediate environmental problems, but where applicants have profound financial difficulties that make it very difficult to financially justify the investment of WPCLF. The financial risk/environmental benefit ratio must be addressed on a case-specific basis.

No loans were issued for VAP properties in SFY'04.

## Audits of No Further Action Letters

Ohio EPA annually audits at least 25 percent of all No Further Action (NFA) letters submitted to the Voluntary Action Program in each calendar year. These audits can be limited to a review and analysis of the documents pertaining to the NFA letter to determine compliance with program requirements (Tier I Audit), or be expanded to include sampling and analysis of soils, surface water, air, sediments or ground water (Tier II Audit). Audits are conducted to determine if the properties meet applicable standards after completion of the remedial activities. Audits also are conducted to ensure that certified professionals and certified laboratories that performed work in support of the NFAs possess the qualifications necessary to perform work under the VAP and that their work results in NFAs that are consistent with applicable standards.

OAC 3745-300-14 describes the procedures for selecting and conducting audits of NFA letters. The rule establishes three "pools" of NFA letters to prioritize their selection for audits. These are the mandatory, priority and random audit pools. The *mandatory audit pool* includes NFA letters meeting one of six criteria that provide reason to believe the NFA letter was issued fraudulently or that performance of the certified professional who issued the NFA letter or the certified laboratory that performed analyses in support of the NFA letter was inadequate. The *priority audit pool* includes NFA letters that included a risk assessment or employed an engineering control (such as a fence) or institutional control (such as a deed restriction) as a remedial activity. The *random audit pool* includes all other NFA letters, including those from the priority audit pool that are not selected during the initial random selection as described below. Properties were selected according to criteria and procedures described in OAC 3745-300-14.

In addition to auditing all NFA letters in the mandatory audit pool, OAC 3745-300-14 requires Ohio EPA to audit at least 25 percent of NFA letters for properties where remedial activities occurred and 25 percent of those where no remedial activities occurred. Letters are randomly selected from the priority audit pool and the random audit pool to meet the 25 percent quota.

In calendar year 2003, the VAP audited eight of the 29 NFA Letters requesting a CNS that were submitted to Ohio EPA during the previous year (2002), or 28 percent. The following table summarizes the name and address of the properties audited, the NFA number, the basis for selecting the property for audit, and the status of the audit. The completed audits found the properties to be protective of human health and the environment.

## 2002 NFA Letters Selected for Audit in 2003

PROPERTY NAME AND ADDRESS	NFA NUMBER	AUDIT POOL	STATUS
ITT Jabsco Property 501 West Liberty Street Springfield, Clark Co.	02NFA132	Selected from Priority Audit Pool	Tier I Audit in Progress
The Handwell Company 304 West Mound Street Columbus, Franklin Co.	02NFA140	Selected from Priority Audit Pool	Tier I Audit in Progress
Engle Lake Drive Property East of Engle Lake Drive Middleburg Heights, Cuyahoga Co.	02NFA141	Selected from Priority Audit Pool	Tier I Audit in Progress
Western Parcel, Former ALSCO Aluminum Manufacturing Facility One Anaconda Drive Gnadenhutten, Tuscarawas Co.	02NFA142	Selected from Priority Audit Pool	Tier I Audit Completed
Ford Motor Company Forge Plant Canton 3707 Georgetown Road Canton, Stark Co.	02NFA143	Selected from Random Audit Pool	Tier I Audit Completed
American Paper Group 8401 Southern Blvd. Solon, Cuyahoga Co.	02NFA146	Selected from Priority Audit Pool	Tier I Audit in Progress
Niles Manufacturing & Finishing Inc. 465 Walnut Street Niles, Trumbull Co.	02NFA148	Selected from Priority Audit Pool	Tier II Audit in Progress
Kurz-Kasch, Inc. Property 199 East State Street Newcomerstown, Tuscarawas Co.	02NFA149	Selected from Priority Audit Pool	Tier I Audit Completed

## VAP EXPENSES FOR FISCAL YEAR 2004 (SFY '04)

### PERSONNEL

Fund 4R9 - VAP Fund	\$ 401,421.00
Hazardous Waste Management Fund	\$ 237,102.55
General Revenue Fund	\$ 634,035.59
Superfund Grants (Federal dollars)	\$ 188,000.03
<b>Total Cost of Personnel</b>	<b>\$ 1,460,559.17</b>

### MAINTENANCE COST OF THE PROGRAM

Fund 4R9 - VAP Fund	\$ 196,957.50
Hazardous Waste Management Fund	\$ 15,345.53
General Revenue Fund	\$ 265,591.51
Superfund Grants (Federal dollars)	\$ 66,023.61
<b>Total Cost of Maintenance</b>	<b>\$ 543,918.15</b>

### EQUIPMENT

Fund 4R9 - VAP Fund	\$ -0-
Hazardous Waste Management Fund	\$ -0-
General Revenue Fund	\$ 818.59
Superfund Grants (Federal dollars)	\$ 5,226.01
<b>Total Cost of Equipment</b>	<b>\$ 6,044.60</b>

### OTHER - CONTRACTUAL SERVICES

Fund 4R9 - VAP Fund	\$ 2,500.00
Hazardous Waste Management Fund	\$ -0-
General Revenue Fund	\$ 570.29
Superfund Grants (Federal dollars)	\$ 16,200.46
<b>Total Cost of Other Contractual Services</b>	<b>\$ 19,165.75</b>

### OPEN ENCUMBRANCE SFY '04

Fund 4R9 - VAP Fund	\$ 6.93
Hazardous Waste Management Fund	\$ 17,941.57
General Revenue Fund	\$ 2,964.53
Superfund Grants (Federal dollars)	\$ -0-
<b>Total Open Encumbrance</b>	<b>\$ 20,913.03</b>

<b>TOTAL VAP PROGRAM COST FOR SFY '04</b>	<b>\$ 2,050,705.70</b>
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## VAP REVENUE FOR SFY '04

Certified Professional Fees	\$ 190,500.00
Certified Laboratory Fees	\$ 79,360.38
No Further Action (NFAs) Fees	\$ 62,300.00
Technical Assistance Cost Recovery	\$ 158,183.50
AGO Collected	\$ 8,305.33
Misc. - photocopying, etc.	\$ 800.00
<b>TOTAL REVENUE FOR SFY '04</b>	<b>\$ 499,449.21</b>

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