



January 27, 2016

Mr. Steven M. Geiger  
Reklamation, LLC  
1000 Bricklawn Avenue  
Gahanna, Ohio 43230  
Via email: [geigerexcavating.steve@aol.com](mailto:geigerexcavating.steve@aol.com)

Re: **Voluntary Action Program Summary Status  
Southpark Development  
Gahanna, Franklin County, Ohio 43230  
WCG Project No. 3870-351-01-02**

Dear Mr. Geiger:

**Weaver Consultants Group, LLC (WCG)** is preparing this letter to lay out the steps involved in working through the Ohio Environmental Protection Agency (EPA) Voluntary Action Program (VAP). As the program name states this is a voluntary program for use by non-responsible parties to address contamination present at a property. The program can be used to clean up a piece of property following specific standards developed by the Ohio EPA. Once cleanup requirements are met, the VAP Certified Professional issues a "No Further Action" (NFA) letter to the Ohio EPA and the director of the Ohio EPA issues a covenant not to sue (CNS). In order to satisfy the VAP standards, a multi-phased approach is undertaken to assess, remediate and close any potential identified areas at the property. This process typically takes multiple years to complete if funding is secured and readily available at the beginning of the project.

In addition to the multi-phased approach for the VAP program, there is also an intricate web of funding options available for these voluntary clean-up projects by non-responsible parties. Identifying and securing funding on projects such as the Southpark Development can take years to develop and secure as there are many different options available depending on the plans for the development, ownership structure of the project, and level of local government involvement.

Reklamation, LLC (Reklamation), the developer for the Southpark Development project, has spent the past few years identifying and acquiring some of these sources of funding for the project. Reklamation also spent that time attempting to locate a viable end user for the property once the development was completed. During that time, Reklamation paid for and commissioned assessment work without funding to complete Phase I ESAs in 2013 on the two adjoining parcels consisting of 3.7 acres and 1.9 acres located to the west of the main landfill 23-acre parcel. Following the Phase I ESAs, the developer commissioned and paid for a Phase II PA on the two adjoining parcels with a report issued in December 2013. In summer of 2014, a draft Remedial Action Plan (RAP) was prepared for Reklamation and issued to the Ohio Development

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Services Agency (ODSA) for a potential funding source through the Ohio Water Development Authority (OWDA). Following issuance, those funds were secured to provide a low interest revolving line of credit/loan for cleanup related tasks for the development. A potential end user was identified in 2015 by Reclamation. With the identification of a potential end user, Reclamation able to secure funding through JobsOhio for assessment, and was able to perform the updated Phase II Property Assessment (PA) for the main 23 acre landfill parcel. The assessment phase on the main 23-acre landfill parcel was initiated in July of 2015. The Phase II PA was completed in draft form and submitted to JobsOhio for funding on December 30, 2015. The recent assessment included over 90 sampling probes and three groundwater wells to collect soil, water, and soil gas samples for analysis.

Also, in addition to the Phase I ESAs and Phase II PAs performed, Reclamation has commissioned an environmental consultant to monitor the explosive gas monitoring wells around the landfill for the past 5 years. WCG is the current consultant completing this monitoring and we have performed semi-annual monitoring since January 2015. Prior to WCG's involvement, Professional Service Industries, Inc. (PSI) performed the monitoring on a semi-annual basis from the end of 2011 through the end of 2014.

This is a complicated process that involves many steps. We are currently toward the end of the assessment stage of this project, although additional assessment is still likely to be completed. The next step in the process would be to develop a RAP for the entire project. Following development of a RAP, remediation of impacted areas would be performed. These can be addressed through many different potential processes such as removal, risk assessment, remediation in place, engineering controls, Institutional controls, etc. Once the impacted areas are addressed to the satisfaction of Ohio EPA, a NFA can be issued for the project to obtain a CNS from the Ohio EPA.

We appreciate the opportunity to help you on this project. If you should have any questions or comments concerning this letter, please do not hesitate to contact me at 614-389-4134 or 614-787-1297. If requested, WCG would be happy to discuss our findings, conclusions and recommendations further as needed.

Sincerely,

**Weaver Consultants Group, LLC**



Robert M. Freda, P.E., VAP CP  
Senior Project Manager

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