

VAP Phase I Property Assessment Update
Volume III (Appendix H Part 2)

*Southern Tier Whittier Peninsula
Columbus, Ohio*

Prepared For:

**City of Columbus
Columbus, Ohio**

June 2005

VAP PHASE I PROPERTY ASSESSMENT UPDATE

**SOUTHERN TIER WHITTIER PENINSULA
COLUMBUS, OHIO**

PREPARED FOR

**CITY OF COLUMBUS
COLUMBUS, OHIO**

PREPARED BY

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JUNE 2005

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1.0 INTRODUCTION (OAC 3745-300-06 (I) (1))

1.1 General

Burgess & Niple, Inc. (B&N) was authorized by the City of Columbus to prepare a Voluntary Action Program (VAP) Phase I Property Assessment Update for a series of properties located on the Southern Tier of the Whittier Peninsula in Columbus, Ohio (Property), as shown on **Figure 1**. The Property evaluated in this update consists of 20 individual parcels of land totaling approximately 80 acres. The 20 parcels of land are associated with five frontal addresses identified as:

- 400 West Whittier Street - City of Columbus Automobile Impound Lot (Upper Lot and Office);
- 420 West Whittier Street - Columbus Recreation & Parks Administration;
- 440 West Whittier Street - Columbus Recreation & Parks Service Garage;
- 500 West Whittier Street - Former Universal Concrete (Lower Impound Lot); and
- 580 Furnace Street - Former Columbus Scrap (CSX Transportation Property);

The City of Columbus, Ohio currently owns the parcels associated with 400 to 500 West Whittier Street, and CSX Transportation currently owns the two parcels associated with 580 Furnace Street. The site features are shown on **Figure 2**. A chain of title conducted by B&N is included in **Appendix A**. A Site Coordinate Map depicting the Property boundary is included in **Figure 3**.

This investigation is consistent with the requirements for VAP Phase I Property Assessments, set forth under Ohio Administrative Code (OAC) 3745-300-06. As defined in this rule, the purpose of the assessment is 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 including any release from management, handling, treatment, storage, or disposal activities from on, or off-Property activities” (OAC 3745-300-06(B)). The VAP Phase I includes the results of database searches for federal, state, and local regulatory agencies, and summarizes information collected through site visits, interviews, and the review of historical records.

Based on the findings of this report, a Phase II Property Assessment is required before a No Further Action (NFA) letter can be issued by a VAP-Certified Professional (CP). The following sections provide general information regarding the Phase I as required in OAC 3745-300-06 (I)(1).

1.2 Dates of Investigation (OAC 3745-300-06 (I)(1))

The Phase I Update was initiated on May 10, 2005 and was completed on June 8, 2005. Mr. Joseph R. Christopher, Environmental Scientist, and Mr. Larry S. Smith, PE, CP No. 133 of B&N performed a walkthrough site inspection of the Property on May 10, 2005. Information on the Property was developed subsequent to the inspection of the Property.

1.3 Volunteer Name and Address (OAC 3745-300-06 (I)(1))

The volunteer for the Property is:

City of Columbus
109 North Front Street
Columbus, Ohio 43215
Phone No: (614) 645-6986

The contact person for the City of Columbus is Ms. Lori Baudro, Neighborhood Planning Manager.

1.4 Project Personnel (OAC 3745-300-06 (I)(1))

The following B&N personnel prepared the Phase I Update:

Name	Position	General Duties
Mr. Larry S. Smith, PE	Ohio Environmental Protection Agency (EPA) CP No. 133	Project Oversight, Site Inspection, and Report Editing
Mr. Joseph R. Christopher	Environmental Scientist	Site Inspection, Data Evaluation, Report Preparation

1.5 Limitations (OAC 3745-300-06 (I)(6))

Access to the Property was provided on May 10, 2005. There were physical obstructions, including an 8-foot security fence and dense vegetation growth that limited visibility of portions of the property. The portions of the property that visibility was limited are identified as the forested section to the east and portions of the actual peninsula portions along Scioto River and bike path. In addition, at the time of the site investigation access was denied to the portion of the Property currently owned by CSX Transportation (former Columbus Scrap). Observations of this part of the property could only be achieved from the City of Columbus property boundary.

In accordance with OAC 3745-300-06, this Phase I Update does not include the evaluation of specific environmental issues which require specialized services including wetland surveys or delineation, the potential for radon gas, or lead paint or asbestos surveys. In addition, it does not include the sampling of any media. Due diligence, with respect to file reviews, was performed in accordance with the OAC 3745-300-06.

This Phase I Update includes both document review of information on the Property, as well as properties in the immediate vicinity. Due to the absence of any occupants for the portions of the Property previously occupied by Columbus Scrap, no interviews were conducted. Information contained within a 1998 Phase I Property Assessment report for Columbus Scrap was used in preparing this Phase I Update.

2.0 DESCRIPTION OF PROPERTY

2.1 Location of Property (OAC 3745-300-6 (I)(1))

The Property is identified as the Southern Tier of the Whittier Peninsula, southwest of downtown Columbus, Ohio along the east side of West Whittier Street, and adjacent to the Scioto River. Two forested parcels of land containing a bike path are located along the west side of Whittier Street adjacent to the Scioto River. The location of the Property is shown on the Southwest Columbus U.S. Geological Survey (USGS) map, **Figure 1**, Site Location Map.

2.2 Legal Description (OAC 3745-300-06 (I)(1))

A legal description of the Property is presented in **Appendix B**.

2.3 Setting

The Property is located in a mixed-use warehouse/light industrial area southwest of downtown Columbus. The Property consists of 18 parcels of land associated with five frontal addresses. The northern portion of the Property consists of the historic location of Universal Concrete. This portion is now occupied by the lower lot of the City of Columbus Automobile Impound Lot. At the time of the site visit, this area was covered by numerous automobiles and surrounded by a security fence. The central and southern portions of the Property are presently occupied by the upper impound lot, Recreation and Parks service garage and exterior equipment storage, Recreation and Parks warehouse, and the Recreation and Parks administrative offices. A strip of forested land to the west, along the Scioto River, contains dense vegetation and an asphalt recreational bike path. A portion of land along the southeast is occupied by dense foliage and mature trees. This area was not accessible during the Phase I Update. The former Columbus Scrap (CSX Transportation) property is situated east of the lower impound lot. B&N was not allowed access to this area of the Property during the Phase I Update.

Surrounding properties to the north consist of the adjacent property identified as the EV Bishoff property and the Lazarus Warehouse Distribution Center. The former Cunard Lang Concrete Company, the Koch Material asphalt plant, and Maier Warehouse are located further to the north. Several properties owned by the City of Columbus and private commercial operations are located to the northeast of the Maier warehouse. Several sets of railroad tracks separate the Property from the eastern adjacent

properties. Whittier Street bounds the Property to the west, and the Scioto River is located west of Whittier Street.

The following section summarizes the topographic setting of the Property as well as the known geological and hydrological conditions, which could potentially affect the distribution of chemicals of concern (COCs) at the Property.

2.3.1 Topographic Setting

A portion of the USGS Southwest Columbus, Ohio 7.5-minute series topographic quadrangle map, showing the Property and surrounding the Whittier Peninsula area, is presented as **Figure 1**. According to the map, the Property is located on relatively level ground at an approximate elevation of 710 feet above mean sea level (amsl). The northern portion of the Property, lower lot, was observed to be topographically lower, approximately 15 feet, than the southern portion of the Property. In addition, a sharp topographical rise was observed leading to Whittier Street from the northwestern portion of the Property which is at present a storage yard for mulch utilized in the city parks. Based on surface topography near and within the Property, the expected direction of surface water flow is southwest toward the Scioto River, which drains south to the Ohio River. Shallow groundwater found in the unconsolidated soils below the areas to the north of the Property has been identified by groundwater monitoring wells, installed by B&N, to flow in a south to southwesterly direction toward the Scioto River. A DLZ, Inc. Phase II Environmental Site Assessment (ESA) identifies groundwater to flow in a similar direction under the Property.

2.3.2 Geologic and Hydrologic Setting

The City of Columbus is located within the Central Ohio Clayey Till Plain of the Glaciated Central Lowland Physiographic Region of Ohio (Brockman, 1998). Geology consists primarily of (clayey, high loam) Wisconsin-age till and sand and gravel outwash over Silurian Limestone and Devonian Ohio Shale while primarily ground moraines of Wisconsinan-age exist in most other areas throughout Franklin County.

2.3.2.1 Surficial Geology

Surface soils consist of clayey till with well-defined ground moraines and some end moraines in the region. Soils were formed in the high-lime glacial drift of the Wisconsinan-age Subregion B. The soils within the Scioto River Valley west of downtown Columbus and west of the Whittier Peninsula consist of the Medway-Genesee-Sloan association. However, due to development of the Whittier Peninsula, soils within the area are identified as Urban land-Genesee complex, occasionally flooded. The soils are well drained to poorly drained and are found on floodplains, terraces, and outwash plains. These soils formed in glacial drift are derived mostly from limestone and dolomite.

The Soil Survey of Franklin County (U.S. Department of Agriculture [USDA], 1980) shows the majority of surficial soils at the facility classified as Urban land-Genesee complex, occasionally flooded (Uw). The Urban land part of this soil unit is obscured by pavement, streets, parking lots, and buildings. Urban land soils in Franklin County are characterized as nonhydric soils. A copy of part of the Franklin County Soil Map contained in the Soil Survey is presented in **Appendix C**.

2.3.2.2 Bedrock Geology

The bedrock underlying the glacial deposits and exposed in places by erosion and construction, is sedimentary. Ages range from lower Devonian to lower Mississippian. The lithologies consist of dolomitic limestone, shale, and sandstone. Limestone is predominant along the Scioto River Valley in the Columbus area.

2.3.2.3 Hydrogeology

A continental climate with wide annual ranges in temperatures characterizes the weather of Franklin County. According to *The Soil Survey of Franklin County* (USDA, 1980), the average winter temperature is 30 degrees Fahrenheit (°F); the average summer temperature is 72 F. The average annual precipitation is approximately 36.7 inches. The average seasonal snowfall is 28 inches.

According to the *Ground Water Resources Map of Franklin County*, the yields from individual wells drilled in the region may exceed 400 gallons per minute (gpm). A search of Ohio Department of Natural Resources (ODNR) records did locate logs of completed water wells within 0.5 mile of the Property. One well is identified to be for monitoring purposes and the other two have no use designation.

2.3.3 Special Environmental Conditions

The following sections summarize the special environmental conditions identified for the Property and the surrounding area.

2.3.3.1 General Area Information

The Property is located adjacent to the Scioto River. The Scioto River flows generally in a southerly direction through the Scioto Peninsula on the west side of downtown Columbus and then along the west side of the Property toward its ultimate confluence with the Ohio River.

The National Wetlands Inventory (NWI) map prepared by the U.S. Department of Interior, Fish & Wildlife Service (USFWS), normally identifies areas that are recognized by the USFWS as wetlands. Activities that are conducted in areas designated as wetlands may be restricted by the federal, state, or local agencies. The 1995 NWI Southwest Columbus, Ohio Quadrangle map does not identify any designated wetland areas for the area of the Whittier Peninsula or for the Property contained therein. However, the adjacent Scioto River to the west is highlighted and is considered a jurisdictional “waters of the U.S.” A copy of the 1995 NWI map is found in **Appendix C**.

According to the Federal Emergency Management Agency (FEMA) and Flood Insurance Rate Maps (FIRM) Map No. 39049C0234H, revised March 16, 2004, for Columbus, Ohio, the Property is identified as being located primarily in Zone AE; however, the southern portion of the Property is located in Zone X. FEMA classifies Zone AE for this specific area as Special Flood Area subject to inundation by the 1 percent annual chance flood. Zone X has been determined to be outside the 0.2 percent annual chance floodplain. The peninsula also has small inclusions along the central portion denoted Flood Zone X. These are areas of 1 percent annual chance flood with average depths of less than 1-foot or with drainage areas less than 1.0 square mile and areas protected by levees from 1 percent annual chance flood. A copy of part of the 2004 FIRM map for the Property is presented in **Appendix C**.

2.3.3.2 Wellhead/Source Protection Areas

There are no endorsed or pending wellhead protection areas (WHPAs) within the vicinity of the Property. No source water assessment protection (SWAP) area has been delineated for the general area of the Property. SWAP is a program to protect Ohio’s water supply sources for public drinking water from future contamination.

2.3.3.3 Sole Source Aquifers

According to the Ohio EPA's Division of Drinking and Groundwater *Sole Source Aquifers in Ohio* Map, 2000, the Property does not lie over a federally designated sole source aquifer as defined in Section 1424(e) of the Safe Water Drinking Act of 1974. There are no sole source aquifers identified within Franklin County.

2.3.3.4 Wildlife Refuges – Natural Areas and Preserves

B&N reviewed the ODNR's facilities list to determine if wildlife refuges exist within the site vicinity. Based on the review, there are no ODNR-maintained wildlife areas in Franklin County. In addition, there are no natural areas or preserves listed in Franklin County within a 0.5-mile radius of the Property.

There are no ponds within the immediate vicinity of the Property, based on B&N's reconnaissance of the Property and surrounding areas. However, the Scioto River with historical significance and current recreational use is located adjacent to the west of the Property.

2.4 Land Use (OAC 3745-300-06(I) (5))

A review of historical information on the Property was conducted to identify past land use that may have contributed to environmental concerns. To determine the historical use of the Property, title searches, previous site assessments, historic mapping, Sanborn Fire Insurance Maps, and aerial photographs were reviewed.

2.4.1 Historical Land Use

The Property and surrounding areas has historically been used for a number of industrial facilities and processing plants, as well as being owned, in part, by railroad companies. The operations typical of these land uses include a railroad transportation corridor, concrete manufacturing, reported use as a landfill, recreation and parks department office space and light equipment repair, and a police impound lot.

2.4.2 History of Buildings on the Property

B&N reviewed historic documentation from aerial photographs covering the years 1938, 1950, 1957, 1967, 1972, 1980, and 2000, as well as Sanborn Fire Insurance Maps for the years 1887, 1901, 1921, and a city directory search conducted by Dodson-Stilson, Inc. (Dodson-Stilson) in their Limited VAP Phase I Report for information on building development on the Property.

2.4.2.1 CSX Transportation, Inc./Columbus Scrap

This portion of the Property is currently owned in the name of CSX Transportation, Inc. and is located at 580 Furnace Street. Historical documentation indicates no structures were located on this portion of the Property until some time between 1938 and 1950. A city directory search completed by Dodson-Stilson as part of their 1998 Limited VAP Phase I indicated this portion of the Property was not listed until 1951 when it was first occupied by the Handler-Marcus Compressed Steel Corp. and was operated as a steel scrap yard. Building development, presumably for the Handler-Marcus scrap yard operation, is depicted on the northwest corner of this portion of the Property some time between 1951 and 1957. The historical documentation depicts railroad tracks as being situated on the northeast and southwest portions of Columbus Scrap from as early as 1887. The structures on this portion of the Property are apparent, as is the historic scrap steel operation, until 1989. By 2000 the structures appear to have been demolished; however, the 2000 aerial derived from the Franklin County Auditor, depicts the general location of the structures previously located on the Property.

2.4.2.2 Police Impound Lot/Universal Concrete

This portion of the Property is currently owned by the City of Columbus, Ohio and is used as a police impound lot at 400 West Whittier Street. This portion of the Property is separated into two halves, an upper and lower lot. The lower lot (north) is the previous location of Universal Concrete and is separated from the upper lot (south) by a forested strip of land and an approximate 15-foot topographical rise within the tree line. The Sanborn Fire Insurance Maps only covered the portion of the Property that previously contained the Universal Concrete operation. The 1952 map indicates the Universal Concrete Company existed on the northern portion of the Property, just south of the adjacent Lazarus Warehouse.

The aerial photographs depict Universal Concrete on the northern portion of the Property as far back as 1938. Development on this portion of the Property consisted of one large building and several smaller ancillary structures. Development appears to have originated north of a lake that appears on the

1938 aerial photograph. This lake is presumably in conjunction with the sand and gravel quarry that was present to facilitate the concrete operation. Development of the Universal Concrete facility appears to migrate east as the lake is apparently filled over time. The lake appears to have been completely filled by 1957.

The southern portion of the Property is currently occupied by the police impound lot, as well as the impound lot administration and receiving buildings. This portion of the Property appeared to be undeveloped, cleared land from 1938 to between 1957 and 1964. This cleared portion is reported to be the previous location of a City refuse dump. Development of the impound lot originates on the southern section of the Property some time between 1957 and 1964. One small building is apparent near the entrance off of Whittier Street just north of the entrance to the Jackson Wastewater Treatment Plant (WWTP) that is located adjacent to the south. Several expansions to the upper lot are apparent from its first development. The present day buildings on the impound lot are first observed in the 1989 aerial photograph. The 2000 aerial photograph depicts the Universal Concrete operation to have been removed and replaced by the lower impound lot.

2.4.2.3 Recreation and Parks Buildings

The Recreation and Parks buildings are located on the west central portion of the Property from 420 to 460 West Whittier Street. This portion of the Property is not identified on the Sanborn Maps. The aerial photographs depict a lake and the southern portions of the Universal Concrete operation on the Property. As stated previously the lake appeared to have been gradually filled from some time after 1938 to approximately 1957. This portion of the Property was reported to be the location of the City refuse dump as well. The first apparent building development is viewed on the 1964 aerial photograph. This development appears to be in the same location as the present day 440 West Whittier Street building (Parks Maintenance). By 1980 development of this portion of the Property is depicted by the 420 and 460 West Whittier buildings. The 1989 aerial shows an expansion along the southeast wall of the 440 West Whittier building. The 2000 aerial depicts the Property in the same general configuration and stage of development as was observed during the B&N site investigation. The 2000 aerial depicts the greenhouse structures to the southeast of 420 West Whittier that are not depicted on previous photographs. In addition, the rear portion of the 440 West Whittier building appears to have been removed some time between 1989 and 2000. This was reported to be due to subsidence issues related to the historic landfill on site.

2.4.2.4 **Bike Path**

This portion of the Property is located along the Scioto River, west of Whittier Street, and is currently occupied by dense scrub/shrub and mature tree growth, as well as asphalt recreational bike/walking path. This portion of the Property also extends along the Property interface with the Scioto River to the north where it terminates at an intersection with Interstate 70 (I-70). The only development historically documented for this portion of the Property is in conjunction with the sand and gravel quarry associated with Universal Concrete. The 1938 aerial photograph depicts a portion of land extending into the Scioto River that is interspersed with primitive roads or trails. This portion appears to have been relocated to the historic quarry lake located east of Whittier Street. The removal of the soil in order to presumably fill the lake is what appears to have actually created the apparent “Baja” on the Property. The Baja portion appears to undergo frequent flooding events as evidenced in aerial photographs from 1950 to 1989.

Bike path development appears to have initiated some time between 1972 and 1980. This portion has been allowed to regenerate vegetation as major development associated with clearing and quarry activities ceased around 1950 to 1957.

2.4.3 **Current Land Use**

Currently, land use is associated with office space, light equipment repair, equipment storage, warehousing, vegetative greenhouse operation, vacant land, and a large police automobile impound lot. CSX Transportation, Inc. currently operates a rail line across the northeast portion of the Property (Columbus Scrap).

2.4.4 **Intended Land Use**

The intended future use of the Property is for the City of Columbus to develop residential housing and commercial businesses.

3.0 PHASE I PROCEDURES (OAC 3745-300-06 (I) (4))

B&N prepared this report as an update to the 1998 Limited VAP Phase I Environmental Report prepared by Dodson-Stilson for the Property. The update brings the report in compliance with Phase I Property Assessments under Ohio EPA's VAP as codified at OAC 3745-300-06. The update includes the following:

1. Property Inspection by a CP under the VAP;
2. Review of Dodson-Stilson 1998 Limited VAP Phase I Property Assessment;
3. Review of 1992 City of Columbus Phase I ESA;
4. Environmental database update;
5. Interviews;
6. Review of available files;
7. Eligibility issues; and
8. Determination of Identified Areas (IAs).

3.1 Property Inspection

A Property inspection was conducted by B&N's Mr. Joseph R. Christopher and Mr. Larry S. Smith, PE, CP No. 133, on May 10, 2005. This inspection was completed as part of the VAP Phase I Update, and revealed generally the same conditions observed by Dodson-Stilson in their site visit performed in completion of the 1998 Limited VAP Phase I Property Assessment. One exception is the portion of the Property, formerly Columbus Scrap, appeared to have undergone some changes since the 1998 site visit, which involved the removal of metal scrap and debris, as well as removal of all structures located on the site. A thorough review of the 1998 Phase I ESA was performed in an attempt to correlate findings from the current B&N site visit and to identify areas which may be considered an IA according to the VAP. The following details of the site visit and document review. Photographs documenting current site conditions are included in **Appendix D**.

3.1.1 CSX Transportation, Inc./Columbus Scrap

CSX did not allow access to this portion of the Property; therefore, a detailed inspection of the area was not performed. Information of site conditions was derived from a cursory view from the perimeter, from the Lazarus Warehouse roof, and from findings within the 1998 Phase I Report. The Columbus Scrap portion of the Property appeared to have been cleared of all structures that were

indicated in the 1998 Phase I Property Assessment. Several large excavation holes were observed throughout the Property, along the old western railroad bed. These excavations are presumed to be a result of unauthorized scrap steel scavenging being performed by private individuals. A section of railroad tracks were observed along the eastern portion of the site and were oriented southeast to northwest. Individuals were observed hand excavating the area; however, due to access limitations and safety concerns, no attempt was made to interview the individuals.

No evidence of underground storage tanks (USTs) was observed from the perimeter inspection; however, the areas of excavation revealed numerous pieces of scrap metal. An area along the western property boundary appeared to contain fill material, due to its apparent topographical rise compared to the remainder of the site.

3.1.2 Police Impound Lot/Universal Concrete

The police impound lot is an area of the Property where cars are towed from all over the City of Columbus, and temporarily, in most cases, stored until an owner claims the vehicle. As many as 4,000 vehicles are part of the ongoing inventory on the impound lots. The impound lots were observed to be separated into three distinct portions. The main impound lot (upper lot) was observed to contain two structures at the 400 West Whittier entrance. The main structure functions as the office and customer contact location. The secondary structure is located within the fenced compound and serves as a login point for all impounded vehicles received. No maintenance is performed at this facility; rather, vehicles are all assigned a unique identifying number and distributed to respective locations within the lot. Adjacent to the main lot is an area referred to as the auction area. This area is specifically situated to the east of the main lot and office. Vehicles are stored in this area prior to scheduled auctions that occur monthly. In addition, a heavily forested area to the east of the impound lot and west of a CSX rail line, was not investigated due to access limitations from CSX Transportation and the existence of an 8-foot security fence on the impound lot.

The northern section of the impound lot (previously Universal Concrete) is designated as the lower lot due to the lower elevation as compared to other portions of the lot. This is also the newest section of the impound lot. This portion of the impound lot is bordered by Whittier Street to the west, former Columbus Scrap to the east, Lazarus Warehouse to the north, and the Recreation and Parks buildings to the south. Access roads circumvent the entire lot as to provide access to all portions. Besides the vehicles, empty gasoline tanks, burned vehicles, and empty railway tanker cars are stored in

the northern portion of the lower impound lot, just east of the Lazarus Warehouse. Soil staining was observed on both lots of the Property.

A single monitoring well was observed outside an existing security fence near the lower lot. This is reported to be in relation to previous Phase II ESA work and UST removal on the former Universal Concrete site. In addition, the facilities constructed on the Property were reported to have been constructed in the mid- to late-1960s. A detailed inspection of the interior of the impound lot office and vehicle receiving station was not performed; however, the use of asbestos-containing materials (ACMs) in initial construction is a possibility. No evidence of USTs was observed on this portion of the Property; however, evidence of soil staining and the vast number of vehicles presents the possibility that petroleum impacts to the Property are likely, or occurring.

3.1.3 Recreation and Parks Buildings

The recreation and parks buildings consisted of three brick/cement block buildings that housed office space and light maintenance of equipment, as well as short-term storage of cleaning supplies, solvents, and paints. These buildings are located south of the lower impound lot, east of Whittier Street, and north of the upper impound lot. The buildings on site were constructed between 1964 and 1980 and have undergone some additions over that timeframe. Possible ACMs were observed within the boiler room for the 440 West Whittier building. The area to the west of the three buildings is presently used for storage of equipment.

Areas of stained soil, as well as empty drums labeled “antifreeze” and “hydraulic oil” were observed stored behind the 440 and 460 West Whittier buildings. A cement pad was observed behind the 440 West Whittier building and was reported to be the previous location of a rear extension to the building. Uncorrectable ground subsidence forced the Recreation & Parks Department to remove that addition. An area of fill material was observed behind the 460 West Whittier warehouse. This fill material was reported to be relocated soil from other portions of the site.

An area to the west of the lower impound lot and north of 460 West Whittier is reported to be owned by the Recreation & Parks Department. This area was observed to be used for mulch storage. An area to the east of the 420 West Whittier building (main office) was observed to be used for storage. Three empty aboveground storage tanks (ASTs) were observed to be stored in the northeast corner of the site. An area resembling a maintenance location was observed in the rear exterior of the 420 West Whittier building.

Two sets of monitoring well casings were observed on this portion of the Property. These were located on the south side of the 440 West Whittier building and on the southeast corner of the 420 West Whittier parking lot.

The southeast portion of this area contained greenhouse buildings used as a plant and tree nursery for the local parks. No access was provided; however, herbicide, pesticide, and fertilizer storage is expected to be contained within the greenhouse.

No evidence of USTs was observed during the site investigation. Small amounts of short-term storage of paints, solvents, and cleaning supplies was observed. It is also expected that short-term storage of small quantities of general pesticides/herbicides and fertilizers are contained within the greenhouses.

3.1.4 Bike Path

This portion of the Property is located along the western edge of the property adjacent to the Scioto River. This bike path originates at the southwestern portion of the property at Lower Scioto Park and extends around the Property's western edge and off site to the north. This area was observed to be heavily wooded and contained isolated pockets of trash and debris. This area was observed to contain areas of encampments reported to be occupied by vagrants. No evidence of USTs or hazardous substance storage was observed during the site investigation; however, the Scioto River is considered an environmentally sensitive area and additional permitting may be required should future development be planned for this area. In addition, the surface soils around the lower wooded area adjacent to the Scioto River were observed to be saturated, and evidence of water stained leaves and watermarks from obvious flooding events were observed.

3.2 Review of Previous 1998 Limited VAP Phase I Review by Dodson-Stilson

B&N has reviewed the contents of the 1998 Dodson-Stilson Limited VAP Phase I Property Assessment report. A summary of findings resulting from this review are presented in the proceeding sections. A copy of the conclusions and recommendations section of the 1998 Phase I Report is included in **Appendix E**.

3.2.1 CSX Transportation, Inc./Columbus Scrap

Dodson- Stilson reported this area previously contained a scrap metal operation as well as a railway switching yard. This site is confirmed to have previous impacts from polychlorinated biphenyls (PCBs). Activity was on-going and structures were in tact during the 1998 evaluation. Dodson-Stilson reported this site is included on the Ohio EPA Master Sites List. Dodson-Stilson reported that areas of soil remediation were not evaluated prior to remediation to determine if PCB concentrations were below acceptable levels. The area of remediation is located along the western edge of the site and a PCB soil staging area for PCB-containing soils was just east of that area. This area was reported by Dodson-Stilson to be uncontained. Dodson-Stilson was denied access to the site as well and could not fully investigate the surface. The forested area to the south of Columbus Scrap was reported to contain barrels, apparently from the demolition of the former Universal Concrete facility. A few drums were sent during the site visit.

The primary concerns for this area from the review of the 1998 report are in relation to PCB impacts, heavy metal impacts, volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), polynuclear aromatic hydrocarbons (PAH), and total petroleum hydrocarbon (TPH) as a result of historic operations.

3.2.2 Police Impound Lot/Recreation & Parks Properties

Findings within the 1998 Limited VAP Phase I Property Assessment indicate portions of the Property were owned by Arrow Sand & Gravel Company and were operated as a sand and gravel quarry. A portion of this quarry contained a large lake, specifically on the northern end near the present day Recreation & Parks Department buildings. Dodson-Stilson reported the southern portion of the Property contained a City refuse dump, which was closed during 1936. The specific type of refuse material could not be determined. Universal Concrete operated the northern portion of the Property between 1946 and 1993. This portion of the Property received fill in order to bring it to a level grade and fill the lake. The specific type of fill material could not be determined by Dodson-Stilson.

Four USTs were removed from the Universal Concrete Property in 1992 and a total of 609 cubic yards (cy) of soil were removed from the Property during 1994 as part of remediation activities relating to the UST removal. An NFA letter was issued by the Bureau of Underground Storage Tank Regulation (BUSTR) for the USTs in 1995. Groundwater impacts from benzene have been confirmed on the Property as a result of the removed leaking underground storage tanks (LUSTs) at Universal Concrete.

Concentrations of benzene have been reported to be 65 micrograms per liter (µg/l). VAP groundwater standards are the unrestricted potable use standards (UPUS), which is 5 µg/l for benzene.

A total of four USTs were also removed from the Recreation & Parks portions of the Property during 1990. At the time the 1998 report was submitted, BUSTR had not issued an NFA for these releases. Documentation provided as part of this Phase I Update to the 1998 report shows that BUSTR has since provided NFA letters for all releases reported on the Property.

Dodson-Stilson reported that the primary concerns for this portion of the Property include the following:

- Unknown types of waste material placed in the City dump portion of the Property;
- Unknown types of fill material used to fill the previous lake;
- PAHs, metals, and TPH associated with the former Property use as a railway switching and maintenance yard; and
- PAH impacts from LUSTs.

3.2.3 **Bike Path**

Dodson-Stilson did not investigate the portion of the Property currently containing the bike path and the area adjacent to the Scioto River, therefore no conclusions and recommendations were provided as part of the 1998 report.

3.3 **1992 City of Columbus Phase I ESA Review**

A Phase I ESA was submitted by the City of Columbus on March 20, 1992 in order to determine potential health hazards exist for the entire Whittier Peninsula area prior to purchase by the City of Columbus. The properties within the Phase I ESA were separated into nine contiguous areas. Three areas within the Phase I ESA are: Universal Concrete, Impound lot, and Columbus Scrap and these make up the Property investigated in this Phase I Update. A copy of excerpts from the findings and conclusions is included in **Appendix E**.

Findings in the 1992 Phase I ESA are similar to those in the 1998 Dodson-Stilson Phase I. The City of Columbus found that the Columbus Scrap operation had USTs that would need to be removed or updated, and this portion of the Property was undergoing remediation activities in relation to PCB impacts. Universal Concrete was found to have USTs on site that will need to be removed or upgraded. The City of Columbus Impound Lot/Parks & Recreation property was previously the location of a lake and a City dump. This site also contained an incinerator as part of the City dump. In addition, this property contained USTs, and a release was reported to BUSTR. Surface staining was observed on the impound lot as well. The City of Columbus recommended removal or upgrading of all USTs. In addition, a Phase II ESA was recommended for impacts to the Columbus Scrap and the City of Columbus properties in relation to impacts from LUSTs and the former landfill, as well as unknown fill material used to fill the former lake on site.

3.4 Environmental Database Update

B&N contracted FirstSearch Environmental Technology (FirstSearch), a commercial database firm to conduct a search of U.S. EPA and Ohio EPA databases as well as the UST and LUST databases of the State Fire Marshal BUSTR. The database report included a search of U.S. EPA Resource Conservation and Recovery Act (RCRA) generators and treatment, storage, and disposal (TSD) facilities (CORRACTS and non-CORRACTS), Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), National Priority List (NPL), and Emergency Response Notification System (ERNS) databases, landfill databases, as well as the Ohio EPA's Division of Emergency and Remedial Response (DERR) database.

The database report was used to determine if any of the listed sites are located on or within a specified proximity to the Property. The following sections describe each of the databases included in the search and identify whether the Property is listed on these databases. A total of 267 sites were identified on or within 0.5 mile of the Property. Based on a VAP Phase I Property Assessment conducted by B&N on the northern half of the Whittier Peninsula in 2004 to 2005, none of the adjacent properties around Whittier Peninsula appear to be an environmental concern for the Property. Therefore, the current and historic operations of sites located on the Property appear to present an environmental concern, and would be considered IAs as discussed in the following section. A copy of the entire FirstSearch report is provided as **Appendix F**, which details all 267 sites.

3.4.1 **NPL**

The Property does not appear on the NPL.

The NPL identifies hazardous waste sites targeted by the U.S. EPA for remediation under Superfund.

3.4.2 **CERCLIS List**

The Property is listed on the CERCLIS list. Specifically, the portion of the Property formerly containing Columbus Scrap is listed on the CERCLIS list due to federal enforcement actions in relation to PCB impacts.

The CERCLIS list is a compilation of known and suspected uncontrolled or abandoned hazardous waste sites identified under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (1980).

3.4.3 **Resource Conservation and Recovery Information System (RCRIS) TSD List**

The Property is not listed as a RCRIS-TSD.

The RCRIS lists facilities that treat, store or dispose of EPA-regulated hazardous waste (RCRIS-TSD). The database report does not list any sites within 0.5 mile as an RCRIS-TSD.

3.4.4 **Federal RCRIS Generators List**

The Property is listed on the FirstSearch environmental database as a RCRA Small Quantity Generator (SQG). The Columbus Scrap portion of the Property is identified by FirstSearch to have had one informal written enforcement action from the State of Ohio on September 23, 2004. The Property also has one violation resulting from this enforcement action which has not been resolved.

The RCRIS lists facilities that generate hazardous wastes. SQGs of hazardous wastes (RCRIS-SQG) generate between 100 kilograms (kg) and 1,000 kg of hazardous waste per month. Large quantity generators of hazardous wastes (RCRIS-LQG) generate more than 1,000 kg of hazardous waste per month.

3.4.5 Federal ERNS List

The Property is not listed on the federal ERNS list.

The ERNS is a national computer database system that is used to store information on the sudden and/or accidental release of hazardous substances and petroleum into the environment. The ERNS reporting system contains preliminary information on specific releases including the spill location, the substance released, and the responsible party.

3.4.6 Federal National Corrective Action Priority System List

The Property is not listed as a RCRIS CORRACTS facility.

The RCRIS Corrective Action Report (CORRACTS) contains information pertaining to hazardous waste TSD facilities that have conducted, or are currently conducting corrective action(s) as regulated under the RCRA.

3.4.7 State Hazardous Waste Site (SHWS)

The Property is not listed as a hazardous or solid waste landfill facility.

The Property is listed on the latest 1997 Ohio EPA Master Sites List (MSL) in relation to the former Columbus Scrap. The Ohio EPA MSL is no longer an active database. However, facilities previously listed under the MSL are identified in the FirstSearch report under SHWS database or the CORRACTS database. The MSL was a tracking database of former or suspected hazardous waste facilities identified by the Ohio EPA and updating the list was discontinued after the 1997 issue.

3.4.8 Ohio BUSTR Registered UST List

There is one UST registered for the Property. This UST is registered for the Recreation & Parks service complex located at 420 West Whittier Street. Further investigation performed by B&N determined that this UST was located at the 420 West Whittier Street building and has been removed and issued an NFA from BUSTR. This tank was registered as a 6,000-gallon steel gasoline UST.

The State Fire Marshal's Office, BUSTR, provides a listing of registered USTs for locations throughout the State of Ohio.

3.4.9 Ohio BUSTR LUST List

The Property is listed as having three LUSTs. These LUSTs are associated with eight USTs that were located on the former Universal Concrete site and the Recreation & Parks sites. All of these releases have been issued an NFA from BUSTR.

3.4.10 Ohio EPA Spill Database

FirstSearch lists the site on the 1990 Ohio Spills database as having had possible releases of hazardous materials onto the Property. The portions of the Property listed on the 1990 SPILLS database are summarized below:

- **Columbus Parks & Recreation, Behind 420 West Whittier** - This site is listed as having a reported spill from tires/metals/gas tanks on December 30, 1994. The size of the spill was not known.
- **Whittier Street Peninsula** - No information was provided by FirstSearch.
- **Columbus Scrap** - Located at 580 Furnace Street, the product spilled is listed as smoke and was reported on June 27, 1991. The size of the spill was reported to be unknown.
- **Columbus Scrap Metal** - Located at 570 Furnace Street (same as Columbus Scrap), the product spilled is reported to be diesel fuel. This spill was reported on June 28, 1994 and was approximately 30 gallons. This spill is listed as a small spill of 0 to 499 gallons.
- **Essroc Materials, Inc.** – Located at 500 West Whittier Street. This is the former Universal Concrete facility. The product spilled is reported to be oil and was reported on April 20, 1992. The size of the spill was unknown.

3.4.11 **Division of Emergency and Remedial Response Database (DERR)**

The Property is listed as a DERR facility. The two listings for the Property are summarized below:

- **Whittier Peninsula Project** - This listing is in relation to ongoing environmental activity taking place on the entire Whittier Peninsula as part of an Ohio VAP Brownfield redevelopment project.
- **Columbus Scrap Corporation** - Located at 580 Furnace Street. No information was provided for this listing.

The Ohio EPA's DERR includes facilities that may or may not contain contamination.

3.4.12 **ODNR Water Well Log Information**

A review of the ODNR well logs revealed no water well logs for the Property, and two well logs within a 0.5-mile radius of the Property. The well logs are found in **Appendix G**.

3.4.13 **Facility Index System (FINDS)**

The site is listed two times as a FINDS site on the FirstSearch database. These listings are summarized below:

- **Columbus Scrap Corporation** - Located at 580 Furnace Street. No information was provided by FirstSearch for this listing.
- **City of Columbus** - Located at 440 West Whittier Street. This address corresponds to the Recreation & Parks maintenance building. No information was provided by FirstSearch for this listing.

The FINDS database is EPA's index of identification numbers associated with a property or facility, which EPA has investigated or has been made aware of in conjunction with various regulatory programs. Each record indicates the EPA office that may have files on the site or facility.

3.5 Interviews

An interview with Lieutenant Chuck Chapman of the Columbus Police Department, was conducted as part of the site investigation. Lieutenant Chapman escorted B&N's Mr. Joe Christopher and Mr. Larry Smith on a tour of the police impound lot property. Lieutenant Chapman indicated the Property was previously used as a refuse dump of some sort; however, he had no recollection of the specific type of refuse or the exact timeframe of existence. Lieutenant Chapman also indicated that as many as 4,000 vehicles are located on the facility grounds at any one time. He also indicated impacts from fluids contained in the vehicles are probable as the fluids are not removed by the City prior to storage.

Lieutenant Chapman stated that no USTs or ASTs, other than some empty vehicle gasoline tanks and train tankers are located on the Property. Mr. Chapman also stated the building to the northeast of the main impound office was used for logging-in vehicles and no service or maintenance is performed in that location. Lieutenant Chapman stated vagrants and trespassers live on portions of the wooded area adjacent to the CSX property to the east. He indicated that safety concerns could be an issue during any investigation of that area. Lieutenant Chapman also stated that periodic smoke plumes have been observed from the surface of the impound lot. He had no idea of the origin or composition.

An interview with Mr. Andrew Wells, Recreation & Parks Maintenance Administrator, was performed as part of the B&N site investigation. Mr. Wells provided B&N with a tour of the facilities and grounds for the Parks & Recreation complex. Mr. Wells stated the area under the Parks property is underlain with large amounts of fill material. Land subsidence and damage to buildings has been an issue due to the unstable ground. Mr. Wells stated that during a geophysical examination of the ground beneath portions of the Property, refuse-type materials including empty pill bottles were encountered. A portion of the rear of the 440 West Whittier building was so damaged by the subsidence and beyond repair that it was removed.

Mr. Wells stated all USTs and LUSTs have been removed and NFA letters have been issued. He provided the general location of a heating oil UST that was removed from the 460 West Whittier building front lawn, and the location of the other USTs located around the Recreation & Parks facility. Mr. Wells also stated an asbestos abatement has occurred on the Property in relation to the Parks buildings. He did not have a copy of the abatement reports. Mr. Wells indicated that ACMs could potentially be present within the 440 West Whittier building. He indicated the only use or storage of hazardous substances on any of the Recreation & Parks facilities is in the form of small amounts of degreasers, solvents, paints,

and cleaning supplies. Mr. Wells stated a fire had damaged most of the 460 West Whittier building, supply warehouse, and stated that recent renovations had been completed.

3.6 File Review and FOIA Request

3.6.1 Freedom of Information Act (FOIA)

B&N submitted a FOIA request to the following agencies:

- U.S. EPA;
- Ohio EPA Central District Office (CDO);
- Ohio EPA Division of Hazardous Waste Management (DHW) Central Office (CO), and DERR;
- Ohio Health Department;
- ODNR;
- Ohio BUSTR;
- Franklin County Emergency Management Agency (EMA);
- City of Columbus Fire Department; and
- U.S. Fish & Wildlife Service.

Information received is found in **Appendix H** and discussed below.

U.S. EPA

The U.S. EPA responded to B&N's request and indicated they do not have any information on file in regards to the Property except for the portion of the Property formerly identified as Columbus Scrap. The U.S. EPA indicated in a letter sent to B&N that files on this portion of the Property would have to be reviewed by legal counsel in order to determine which files are subject to public record. The information received by B&N as a result of this review is included in **Appendix H**. Information in this submission indicates Columbus Scrap has been involved in an enforcement action pertaining to PCB impacts to soil and groundwater. The U.S. EPA information submission is inconclusive in that it does not contain information that indicates Columbus Scrap has ever been released from this enforcement action. However, a May 31, 1996 correspondence between Mr. Monsesh Chabria and Mr. Steve Reninger, U.S. EPA on-scene coordinator, indicates all remediation activities required by the U.S. EPA have been completed and accepted by the U.S. EPA.

Ohio EPA CDO

B&N performed a file review at the CDO in order to examine all public records for the Property in response to the FOIA request. Information derived from this review indicated that the Columbus Scrap property had ongoing problems pertaining to PCB impacts. The file contained various documents relating to PCB impact on the Columbus Scrap site. The documents included a preliminary site assessment and a U.S. EPA PCB removal order. The January 1992 correspondence in the file pertaining to the preliminary Brownfield assessment was from the Ohio EPA DERR and indicated that PCB impacts to the soil and groundwater are possible. Their conclusions were that the near site wide impacts by PCBs have a strong possibility to migrate to groundwater, surface water, and air.

In a March 8, 2002 letter from Ohio EPA, the U.S. EPA was referenced as requesting removal of PCB-contaminated soil from the site. This was a 15,000 cy stockpile of soil as a result of site wide remediation activities overseen by the U.S. EPA. This stockpiled soil was removed as per documentation of an email from Mr. Steve Reninger, U.S. EPA. Several other documents in the file were all related to the PCB impacts to the Columbus Scrap site.

The CDO files contained information pertaining to other portions of the Property; specifically, the police impound lot and former Universal Concrete sites. A 1998 Ohio EPA Brownfield Investigation Report for the entire Whittier Peninsula was reviewed and indicated that lead impacts were found on the western edge of the upper impound lot. The lead concentrations were found to be 1,290 parts per million (ppm) at 10 to 13 below ground surface (bgs). The Ohio VAP residential direct contact standard is 400 ppm. The Ohio EPA report recommended further soil studies to determine the extent of lead impacts. In addition, the report indicated several metals above maximum contaminant levels (MCLs) equivalent to generic UPUS were identified; however, the Ohio EPA stated that because the area will not utilize groundwater for potable purposes, that this most likely will not pose a concern.

Documentation in the files indicates that Essroc Materials (Universal Concrete) removed two electrical transformers (non-regulated) in 1993 from the facility. The lab results indicated the PCB concentrations were 1.4 and 4.0 ppm respectively. Also, an asbestos abatement was performed prior to demolition of the Universal Concrete facility.

In addition, several other documents including meeting notes and Ohio EPA interoffice memorandums were reviewed that pertained to the northern portion of the Whittier Peninsula as they relate to the Ohio VAP Memorandum of Agreement (MOA) track. The findings within these documents do not indicate any impacts to the Property are present.

Ohio EPA DHWM Central Office and DERR

Ohio EPA DHWM provided information pertaining to 440 West Whittier Street (Parks & Recreation maintenance) and Columbus Scrap. The information for 440 West Whittier consisted of RCRA site detail sheet indicating the facility is not a hazardous waste generator. A Notice of Violation (NOV) was included relating to Columbus Scrap. This NOV was dated September 23, 2004 and was in reference an annual hazardous waste report requirement. The letter indicates that the total amount of waste removed from the facility in 2002 may place Columbus Scrap into a LQG status. An Ohio RCRA Notifier Site Detail Report dated May 9, 2005 was also included and lists Columbus Scrap as a federal SQG; therefore, it is assumed by B&N that any discrepancies relating to a LQG status were resolved.

Ohio Department of Health (ODH)

The ODH file review indicated that prior notification letters for asbestos abatement were submitted for 500, 420 (2), and 440 West Whittier. No asbestos abatement reports were submitted to B&N.

ODNR

The ODNR response indicated that no record of rare or endangered species exists for the Property, or within a 1.0-mile radius.

The ODNR also indicated that there is no record of existing or proposed state nature preserves, geologic features, breeding or non-breeding animal populations, state parks, forests, or wildlife areas in the vicinity.

BUSTR

A BUSTR file review was conducted by B&N. Information derived from this review indicated that eight USTs were previously located on the Property. All USTs have been removed and NFA letters have been issued. Copies of NFA letters are included in **Appendix H**.

Franklin County EMA

Franklin County EMA responded to the FOIA request indicating no files exist relating to emergency responses to the Property.

City of Columbus Fire Department (CFD)

The CFD responded with information on the Property. Documents reviewed indicate that several fires have occurred in relation to Columbus Scrap and the Police Impound Lot. The documents contained verification of a fire reported to have taken place at the 460 West Whittier (Parks supply building). In addition, CFD records indicate that two 6,000-gallon USTs (one gasoline, one diesel) were removed in 1988 from the Columbus Scrap property. Mapping indicates these USTs were located on the northwest portion of the site, adjacent to the southern portion of the EV Bishoff building, and east of the main entrance to Columbus Scrap. The documents indicate the removal was verified by the CFD; however, no NFA from BUSTR has been issued.

The CFD files indicate the removal of the previously mentioned steel USTs from the 420 West Whittier Street address in 1989. BUSTR has issued an NFA for these USTs. In addition, one 5,000-gallon heating oil UST was removed from the 460 West Whittier address. BUSTR does not have jurisdiction over heating oil USTs; therefore, the documentation for removal supplied by the CFD serves as an NFA. However, no indication of soil testing was reviewed; therefore, any impacts to soil and groundwater has not been evaluated.

All files reviewed as part of this FOIA request are included in **Appendix H**.

3.7 **Eligibility**

Based on information provided in this Phase I, the Property has potential eligibility issues that need to be resolved, exclusively relating to PCB removal on the Columbus Scrap site. The following presents details of eligibility issues.

3.7.1 **NPL Sites (OAC 3745-300-02 (C)(1))**

The site is not listed as an NPL site.

3.7.2 **Underground Injection Control Program (OAC 3745-300-02(C)(2))**

There is no record of an underground injection well located at this Property (Section 5.2.13).

3.7.3 **Hazardous Substance UST (OAC 3745-300-02(C)(3))**

There is no record of a hazardous substance UST.

3.7.4 **Properties Subject to Permit Obligations Under RCRA (OAC 3745-300-02(C)(4))**

The First Search report identified Columbus Scrap former SQG. In subsequent documentation, the site was listed as a LQG in a September 23, 2004 letter from Ohio EPA. However, in a letter dated May 9, 2005 from Ohio EPA, the site appears to be an SQG, and therefore does not have an obligation as a LQG.

3.7.5 **Properties Subject to the Requirements of the Toxic Substance Control Act (TSCA) (OAC 3745-300- 02(C)(5))**

The Property, particularly Columbus Scrap, may have been subject to the requirements of Toxic Substance Control Act (TSCA). This issue needs to be resolved, along with the hazardous waste status and an outstanding federal enforcement action.

3.7.6 Properties Subject to State Enforcement or Federal Enforcement Action (OAC 3745-300-02(C)(6))

The Columbus Scrap site is identified as a CERCLIS facility, and was subject to a Federal Enforcement Action. It is unclear if the enforcement action has been resolved.

3.7.7 Properties Requiring Closure of a Hazardous Waste Facility or Solid Waste Facility (OAC 3745-300-02(C)(7) & (8))

The Property is not a hazardous or solid waste facility subject to closure requirements.

3.7.8 Properties Subject to BUSTR UST Regulations (OAC 3745-300-02 (C)(9))

All the USTs on the Property have received an NFA letter, except the heating oil UST on the Recreational and Parks site. The UST was removed to the satisfaction of the CFD, which has jurisdiction of heating oil USTs.

3.7.9 Properties Subject to Oil and Gas Regulations (OAC 3745-300-02 (C)(10))

There are no known oil and gas wells on the Property, or within 0.5 mile of the Property, according to the ODNR Oil and Gas Well Location Maps.

3.8 Determination of Identified Areas

Based on this Phase I Update, B&N determined there are a total of 14 IAs on the Property. **Table 1** summarizes these IAs, as well as COCs. A map indicating the location of these IAs can be found in **Figure 4**.

4.0 CONCLUSIONS/RECOMMENDATIONS

Based on this VAP Phase I Update, the Phase I report now complies with the requirements of the OAC 3745-300-06.

A total of 14 IAs were found to exist on the Property.

This Property may not meet all eligibility requirements for inclusion into the VAP. Specifically, evidence reveals the Property may still need to obtain closure status from the U.S. EPA in relation to the Columbus Scrap property being included on the CERCLIS list and its inclusion as a TSCA facility.

A VAP Phase II Property Assessment is recommended if a VAP NFA Letter is being pursued for the Property in relation to the 14 IAs.

APPENDIX A
CHAIN-OF-TITLE REVIEW

APPENDIX B
PROPERTY LEGAL DESCRIPTION

APPENDIX C

MAPS

APPENDIX D
PHOTOGRAPHS

APPENDIX E
PREVIOUS REPORT

APPENDIX F
DATABASE REPORT

APPENDIX G
ODNR WATER WELL LOGS

APPENDIX H
FOIA REQUESTS/RESPONSES

U.S. ENVIRONMENTAL PROTECTION AGENCY

OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO HEALTH DEPARTMENT

FRANKLIN COUNTY

COLUMBUS HEALTH DEPARTMENT

OHIO DEPARTMENT OF NATURAL RESOURCES

BUREAU OF UNDERGROUND STORAGE TANK REGULATIONS

COLUMBUS FIRE DEPARTMENT

FIGURES

TABLES