



State of Ohio Environmental Protection Agency

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JUN - 9 2004

OHIO EPA NEDO MAILING ADDRESS:

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

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

June 4, 2004

Certified Mail

Mr. Lou Visco
Graceland Shoppers Limited Partnership
191 W. Nationwide Blvd.
Columbus, Ohio 43215

**RE: Issuance of Covenant Not To Sue for the Former Dry Cleaner,
Graceland Shopping Center Property (04NFA181)**

Dear Mr. Visco:

I am happy to inform you that on June 4, 2004, the Director of the Ohio Environmental Protection Agency ("Director") issued a Covenant Not To Sue ("Covenant") to Graceland Shoppers Limited Partnership for the Former Dry Cleaner, Graceland Shopping Center Property located at 55-63 Graceland Blvd., Columbus, Ohio ("Property"). The Covenant was issued as Final Findings and Orders pursuant to Ohio Revised Code ("ORC") Chapter 3746 and Ohio Administrative Code ("OAC") Chapter 3745-300. You will find the certified copy of the Covenant enclosed.

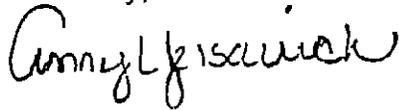
Upon the issuance of these Findings and Orders, and subject to the conditions outlined in the Covenant, the Ohio Environmental Protection Agency covenants not to sue and releases the Graceland Shoppers Limited Partnership and its agents, employees, shareholders, officers, directors, successors and assigns, and successors and assigns of the Property, from all civil liability to the State of Ohio to perform additional investigational and remedial activities at the Property for the releases of hazardous substances or petroleum identified in the Phase I and Phase II Property Assessments completed in accordance with ORC Chapter 3746 and OAC Chapter 3745-300.

The issuance of the Covenant is a final action of the Director and will be public noticed in accordance with OAC 3745-47-07. The action may be appealed to the Environmental Review Appeals Commission ("Commission"). The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice or issuance of the action. (See ORC 3745.04 and 3745.07.) A copy of the appeal must be served on the Director within three (3) days after the appeal is filed with the Commission. The appeal may be filed with the Commission at 309 South Fourth St., Room 222, Columbus, Ohio 43215.

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

Many parties within the agency, the Graceland Shoppers Limited Partnership, and Geotechnical Consultants, Inc., worked hard to identify and resolve the environmental and administrative impediments associated with this property. Congratulations on the issuance of this Covenant. If you have any questions or concerns, please feel free to contact me at (614) 644-2285.

Sincerely,

A handwritten signature in black ink that reads "Amy Yersavich". The signature is written in a cursive, flowing style.

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

Enclosure

cc: Bruce Savage, Certified Professional, Geotechnical Consultants, Inc.
Michael Ebner, DERR, CDO
Martha Cooper, Legal Office
CO DERR-VAP Files

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO E.P.A.

JUN -4 2004

ENTERED DIRECTOR'S JOURNAL

In the matter of:

Graceland Shoppers Limited Partnership
191 W. Nationwide Blvd., Suite 200
Columbus, Ohio 43215

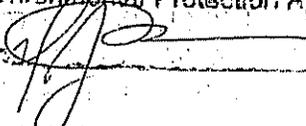
Covenant Not to Sue

Director's Final Findings
and Orders

Regarding property known as:

Former Dry Cleaners
Graceland Shopping Center
55-63 Graceland Blvd.
Columbus, Ohio 43214

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

By: 

Date: JUNE 2004

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

FINDINGS

1. A No Further Action Letter, No. 04NFA181 (the "NFA Letter"), was submitted on March 3, 2004, to the Director under the Voluntary Action Program ("VAP") on behalf of Graceland Shoppers Limited Partnership (the "Volunteer"), by Bruce Savage, a certified professional, No. CP265, as defined in ORC 3746.01(E) and OAC 3745-300-01(A)(8) (the "Certified Professional").
2. Mr. Savage submitted two Addenda to the NFA Letter, received May 21, 2004 and May 28, 2004. For purposes of these Findings and Orders, the term "NFA Letter" includes the two Addenda.
3. The NFA Letter describes investigational and remedial activities undertaken at the 0.625 acre property, located at 55-63 Graceland Blvd., Columbus, Franklin County, Ohio (the "Property"). An exact legal description of the Property is attached hereto as Exhibit 1. A Property location map is attached hereto as Exhibit 2. The NFA Letter includes an Executive Summary, which is attached hereto as Exhibit 3.
4. Based upon the information contained in the NFA Letter, the following investigational and remedial activities were undertaken and completed regarding

the Property:

- a. a Phase I Property Assessment, in accordance with OAC 3745-300-06, to determine whether there is any reason to believe that a release of hazardous substances or petroleum has or may have occurred on, underlying or is emanating from the Property;
 - b. a Phase II Property Assessment, in accordance with OAC 3745-300-07, including but not limited to investigations of all identified areas of concern and affected media, to assess environmental conditions related to any release of hazardous substances and petroleum;
 - c. a Risk Assessment, in accordance with OAC 3745-300-09, including but not limited to assessment of volatile emissions of volatile organic chemicals ("VOCs") from soil and ground water to indoor air, and calculation of exposure to chemicals in ground water during construction activities or maintenance of utilities at the Property; and
 - d. an institutional control contained in the Declaration of Groundwater Use Restriction recorded with the Franklin County Recorder's Office on May 20, 2004 at document number 200405200115979 (the "Declaration"), which prohibits the use or extraction of ground water located at or underlying the entire Property, for any purpose, potable or otherwise, except for investigation or remediation of the ground water, or in conjunction with construction activities or maintenance of subsurface utilities.
5. The Certified Professional has verified by affidavit that the investigational activities undertaken at the Property comply with the applicable standards established in ORC Chapter 3746 and OAC Chapter 3745-300, that the Property is eligible to receive a covenant not to sue under the Voluntary Action Program, and that the voluntary action was conducted in compliance with all applicable federal, state and local laws and regulations.
 6. At the time that analyses were performed, Test America Laboratories, in Dayton, Ohio, No. CL0018, was a certified laboratory as defined in ORC 3746.01(D) and OAC 3745-300-01(A)(7), whose services were used in support of the NFA Letter for the Property (the Certified Laboratory).
 7. According to information provided by the Certified Laboratory in affidavits contained in the NFA Letter, the Certified Laboratory performed analyses for which it was certified and qualified, pursuant to ORC Chapter 3746 and OAC Chapter 3745-300,

that formed the basis for the issuance of the NFA Letter by the Certified Professional.

8. A Declaration of Ground Water Use Restriction was recorded on May 20, 2004 at the Franklin County Recorder's Office, in accordance with ORC 3746.14 and OAC 3745-300-13(E)(13). A copy of the Declaration of Ground Water Use Restriction is attached hereto as Exhibit 4. The Declaration of Ground Water Use Restriction prohibits the use or extraction of ground water at or underlying the entire NFA Property for any purpose, potable or otherwise, except for investigation or remediation of the ground water, or in conjunction with construction activities or maintenance of subsurface utilities.
9. Based on the information contained in the NFA Letter, the recording of the Declaration of Ground Water Use Restriction, and all conditions set forth in these Findings and Orders, the Property meets the applicable standards contained in ORC Chapter 3746 and OAC Chapter 3745-300 for unrestricted land use, including but not limited to:
 - a. residential land use category direct contact soil standards for hazardous substances, in accordance with Tables II and V of OAC 3745-300-08 for generic numerical standards, and OAC 3745-300-09(D) for those standards derived through property-specific risk assessment procedures, at a point of compliance from the surface to a depth of 10 feet;
 - b. soil standards based on volatile emissions of VOCs from soil to indoor air, derived through property-specific risk assessment procedures in accordance with OAC 3745-300-09 for human receptor exposures not related to direct contact with soils, at all points underlying the Property;
 - c. ground water standards, derived through property-specific risk assessment procedures in accordance with OAC 3745-300-09(D), for human receptor exposures not related to potable use of ground water on or underlying the Property. The derived standards are based on an evaluation of volatile emissions of VOCs from ground water to indoor air and an evaluation of exposure with ground water during excavation and construction activities. The standards apply to the ground water in the shallow saturated zone at all points underlying the Property;
 - d. ground water standards, other than potable use standards, in the shallow saturated zone. The shallow saturated zone contains chemicals of concern in excess of unrestricted potable use standards; however, the Declaration of Ground Water Use Restriction prohibits use or extraction of ground water

- at or underlying the Property for any purpose, potable or otherwise, except for investigation or remediation of the ground water, or in conjunction with construction activities or maintenance of subsurface utilities;
- e. applicable standards to satisfy the requirements in OAC 3745-300-07(D)(4) and 3745-300-10(E). The standards were derived to demonstrate that chemicals from on-Property source areas will not result in ground water exceeding unrestricted potable use standards in the underlying bedrock saturated zone, at all points underlying the Property; and
 - f. ground water standards, in accordance with OAC 3745-300-08(E) and 3745-300-10(F)(6)(a)(ii)(b) for ground water emanating to surface water. Ground water potentially emanating from the Property in the shallow ground water zone through utility easements to the Olentangy River meets standards protective of the surface water and ecological receptors.
10. Based on the NFA Letter and subject to all conditions set forth in these Findings and Orders, a covenant not to sue may be issued for the Property in accordance with ORC 3746.12(A), and the voluntary action for the Property is protective of public health and safety and the environment.

ORDERS

Covenant

1. Upon the issuance of these Findings and Orders, and subject to the conditions set forth herein, Ohio EPA hereby covenants not to sue and releases Graceland Shoppers Limited Partnership, and its agents, employees, shareholders, officers, directors, successors and assigns, and successors and assigns of the Property, from all civil liability to the State of Ohio (the "State") to perform additional investigational and remedial activities at the Property for the releases of hazardous substances or petroleum identified in the Phase I Property Assessment and addressed in the Phase II Property Assessment conducted in compliance with ORC Chapter 3746 and OAC Chapter 3745-300.

Conditions and Limitations

2. The Covenant provided in Order No. 1 shall only apply to the 0.625 acre Property described in these Findings and Orders, the NFA Letter and the Exhibits attached hereto, upon which the investigational and remedial activities specified in the NFA

Letter were conducted.

3. Pursuant to ORC 3746.12(B), the Covenant shall remain in effect for as long as the Property continues to comply with the applicable standards upon which the Covenant is based, as referenced in these Findings and Orders.
4. Pursuant to ORC 3746.05, any use of the Property that does not comply with the the use restrictions contained in the Declaration of Ground Water Use Restriction attached hereto as Exhibit 4 and incorporated herein by reference voids the Covenant on and after the date of the commencement of the noncomplying use.
5. Pursuant to ORC 3746.21 and 3746.171, authorized representatives of the Director shall be granted access to the Property for inspection or investigation purposes, including but not limited to determining whether the Property is being used in compliance with the use restrictions contained in the Declaration of Ground Water Use Restriction.
6. The Covenant shall not apply to releases of hazardous substances or petroleum:
 - a. that occur after the issuance of the NFA Letter to the Volunteer;
 - b. on or emanating from the Property, that are not identified in the Phase I Property Assessment or not addressed in the Phase II Property Assessment of the NFA Letter; or
 - c. for which investigational or remedial activities were conducted that were not in compliance with ORC Chapter 3746 or OAC Chapter 3745-300.
7. The Covenant shall not apply:
 - a. to claims for natural resource damages the State may have pursuant to Sections 107 or 113 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA"), 42 U.S.C. 9607 and 9613, as amended;
 - b. to claims the State may have pursuant to Section 107 of CERCLA, 42 U.S.C. 9607, as amended, for costs other than those for damages to natural resources, provided that the State incurs those other costs as a result of an action by the United States Environmental Protection Agency;
 - c. as otherwise provided in ORC Chapter 3746.
8. Nothing in ORC Chapter 3746 limits the authority of the Director to act under ORC

3734.13 and 3734.20 to 3734.23, or to request that a civil action be brought pursuant to the ORC or common law of the State to recover the costs incurred by Ohio EPA for investigating or remediating a release or threatened release of hazardous substances or petroleum at or from the Property, when the Director determines that the release or threatened release poses an imminent and substantial threat to public health or safety or the environment.

9. Nothing in the Covenant shall be construed to limit or waive the Director's authority to revoke the Covenant in response to any of the circumstances for revocation of a covenant, as provided in ORC Chapter 3746 and OAC Chapter 3745-300.

Recordation in Deed Records

10. Pursuant to ORC 3746.14(A), a copy of these Findings and Orders, including Exhibits 1 (Legal Description), 2 (Property Location Map), 3 (Executive Summary) and, 4 (Declaration of Ground Water Use Restriction), shall be recorded in the Franklin County Recorder's Office, in the same manner as a deed to the Property, within sixty (60) days after the issuance of these Findings and Orders.

Transfer

11. Pursuant to ORC 3746.14 and OAC 3745-300-13(K), the NFA Letter and the Covenant Not to Sue/Findings and Orders may be transferred to any person by assignment or in conjunction with the acquisition of title to the Property.
12. In each instrument the Volunteer uses to convey the Property or any portion of the Property, the Volunteer shall include a notice of the Declaration on the Property in accordance with paragraph 9 of the Declaration of Ground Water Use Restriction attached hereto as Exhibit 4. The Volunteer shall submit a copy of each instrument containing the notice of the Declaration of Ground Water Use Restriction whenever such conveyance occurs.

Notice of Transfer or Assignment of Covenant or Property

13. Pursuant to ORC 3746.12(A)(2)(b), the transferor of the Covenant Not to Sue/Findings and Orders, or the Property or any portion of the Property, shall give written notice to the Director of any such transfer or assignment whenever such transfer or assignment occurs.

IT IS SO ORDERED:



Christopher Jones, Director
Ohio Environmental Protection Agency

JUN 4 2004
Date

Director's Final Findings and Orders
Former Dry Cleaners, Graceland Shopping Center
Columbus, Ohio
NFA Number 04NFA181

Exhibit 1
Legal Description of Property

0.625 Acres

Situated in the State of Ohio, County of Franklin, City of Columbus, lying in Farm Lot No. 18, Quarter Township 3, Township 2, Range 18, United States Military Lands, and being part of the 54.289 acre tract conveyed to Graceland Shoppers Limited Partnership, by deed of record in Official Record 08798 H16, (all references are to the records of the Recorder's Office, Franklin County, Ohio), and being more particularly described as follows:

Beginning, for reference, at a point in the original centerline of North High Street at the northeasterly corner of said 54.289 acre tract;

Thence South 03° 45' 00" West, a distance of 658.95 feet, along said original centerline of North High Street and easterly lines of said 54.289 acre tract and the 12.298 acre tract conveyed to Graceland Shoppers Limited Partnership, by deed of record in Official Record 15616 I03, to a magnetic nail set;

The following two (2) courses and distances continuing along the easterly lines of said 54.289 acre tract:

1. Thence North 85° 45' 00" West, a distance of 33.00 feet, to a magnetic nail set;
2. Thence South 03° 45' 00" West, a distance of 251.27 feet, to a magnetic nail set at a common corner of said 54.289 acre tract and the 0.623 acre tract conveyed to Thomas M. Thomas and Jerry L. Thomas, Trustees, by deed of record in Instrument Number 200102080026669;

Thence North 85° 48' 30" West, (passing an iron pin set at a distance of 276.42 feet) a total distance of 347.32 feet, along the southerly line of said 54.289 acre tract and northerly lines of said 0.623 acre tract and the 4.377 acre tract conveyed to Thomas M. Thomas, by deed of record in Official Record 00514 H02, to a point. Said point being the True Point of Beginning of the herein described tract;

Thence continuing North 85° 48' 30" West, a distance of 102.00 feet, along said line common to the 54.289 acre and 4.377 acre tracts, to a point;

The following three (3) courses and distances across said 54.289 acre tract:

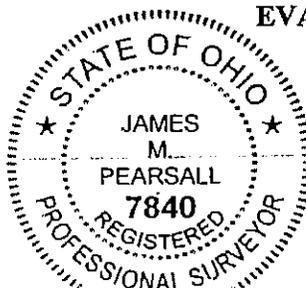
1. Thence North 04°13'37" East, a distance of 267.00 feet, to a point;
2. Thence South 85°48'30" East, a distance of 102.00 feet, to a point;
3. Thence South 04°13'37" West, a distance of 267.00 feet, to the True Point of Beginning. Containing 0.625 acres of land, more or less.

Subject, however, to all legal rights-of-way and/or easements, if any, of previous record.

Iron pins set, where indicated, are iron pipes, thirteen sixteenths (13/16) inch inside diameter, thirty (30) inches long with a plastic plug placed in the top bearing the initials EMHT INC.

The bearings shown hereon are based on the same meridian as the centerline of North High Street (South 3° 45' 00" West) of record in Official Record 00879 H16.

EVANS, MECHWART, HAMBLETON & TILTON, INC.



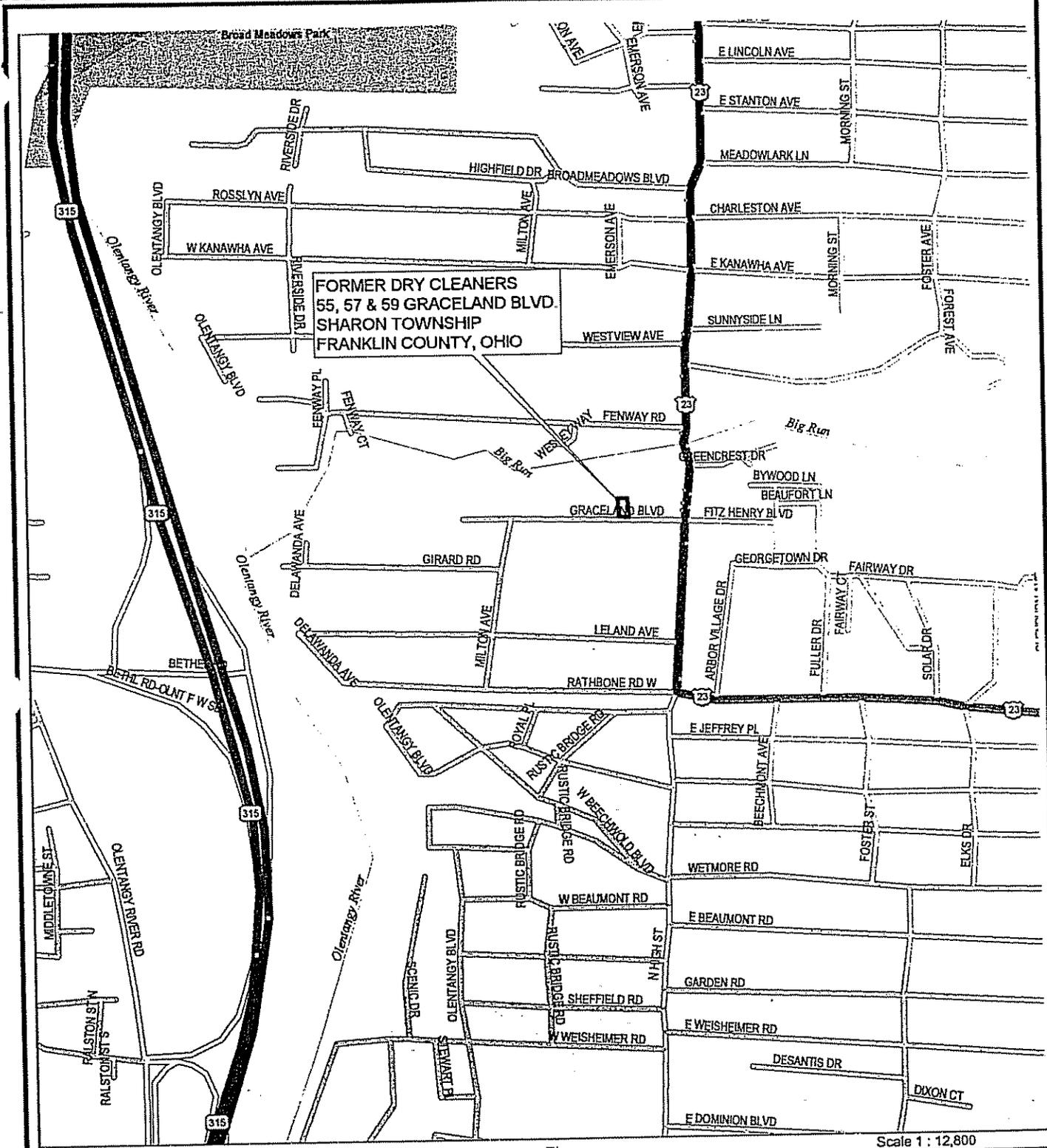
James M. Pearsall
 James M. Pearsall
 Registered Surveyor No. 7840

1/23/04
 Date

Director's Final Findings and Orders
Former Dry Cleaners, Graceland Shopping Center
Columbus, Ohio
NFA Number 04NFA181

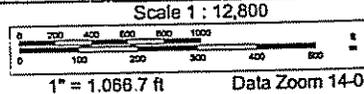
Exhibit 2
Property Location Map

FIGURE 1 – SITE LOCATION MAP



FORMER DRY CLEANERS
55, 57 & 59 GRACELAND BLVD.
SHARON TOWNSHIP
FRANKLIN COUNTY, OHIO

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FORMER DRY CLEANERS
55, 57 & 59 GRACELAND BLVD.
SHARON TOWNSHIP, FRANKLIN COUNTY, OHIO

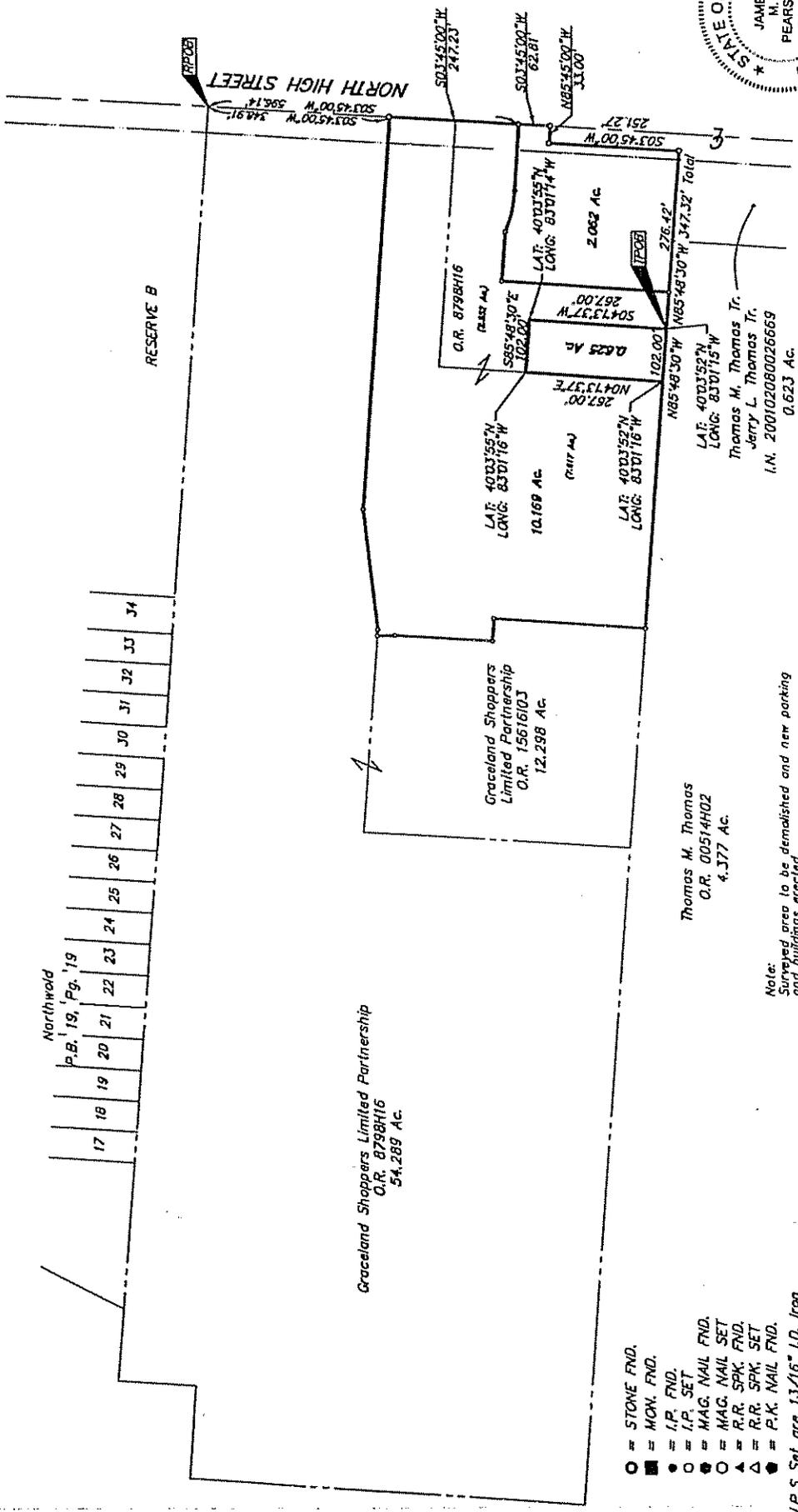
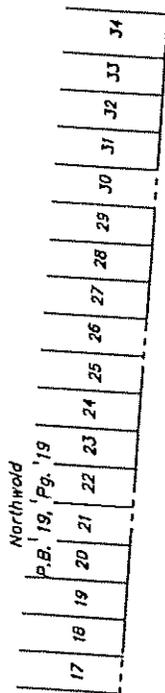




SCALE 1" = 200'

SURVEY OF ACREAGE PARCELS
 LOCATED IN
 FARM LOT QUARTER TOWNSHIP 3, RANGE 18
 UNITED STATES MILITARY LANDS
 CITY OF COLUMBUS, FRANKLIN COUNTY, OHIO

JANUARY 23, 2004



- = STONE FND.
- = MON. FND.
- = I.P. FND.
- = I.P. SET
- = MAG. NAIL FND.
- = MAG. NAIL SET
- ▲ = R.R. SPK. FND.
- △ = R.R. SPK. SET
- ◇ = P.K. NAIL FND.

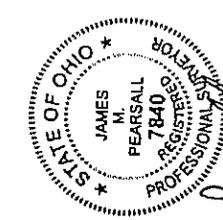
I.P.S. Set are 1 1/16" I.D. Iron pipe w/ cap inscribed EMHT INC



GRAPHIC SCALE
(IN FEET)

Note:
 Surveyed area to be demolished and new parking and buildings erected.

Basis of Bearings:
 The bearings hereon are based on the same meridian as the centerline of North High Street (S 3° 45' 00" W) of record in Official Record 879H16.



By *James M. Pearsall*
 Professional Surveyor No. 7840
 1/23/04

GRACELAND/20040100/4010864

Director's Final Findings and Orders
Former Dry Cleaners, Graceland Shopping Center
Columbus, Ohio
NFA Number 04NFA181

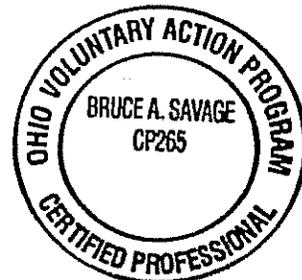
Exhibit 3
Executive Summary

**Executive Summary of No Further Action Letter
ADDENDUM**

**Property:
Former Dry Cleaners
Graceland Shopping Center
55-63 Graceland Blvd.
Columbus, OH 43214**

**Volunteer:
Graceland Shoppers Limited Partnership
191 W. Nationwide Blvd., Suite 200
Columbus, OH 43215**

**Certified Professional:
Bruce A. Savage, CPG
Ohio Voluntary Action Program Certified Professional No. 265
Geotechnical Consultants, Inc.
720 Greencrest Dr.
Westerville, OH 43081
Telephone No. 614-895-1400**



EXECUTIVE SUMMARY

1.0 Introduction

Geotechnical Consultants, Inc. (GCI) was commissioned by Graceland Shoppers Limited Partnership to perform Phase I and Phase II Property Assessments (PAs) and a Property Specific Risk Assessment (PSRA) consistent with Ohio's Voluntary Action Program (VAP) rules established under Ohio Administrative Code (OAC) 3745-300-01 through 15. The purposes of the executive summary is to summarize the findings of the voluntary action conducted at the property, to meet the requirements of OAC 3745-300-13(H) to use the format provided by the Ohio Environmental Protection Agency (EPA) for submitting the NFA letter, and OAC 3745-300-13(J), which is for recording a summary of the NFA letter in the county recorder's office.

Graceland Shoppers Limited Partnership engaged Bruce A. Savage, CPG, VAP Certified Professional No. 265 to prepare and submit the NFA letter. The NFA Addendum has been prepared in response to Ohio EPA's May 3, 2004 comment letter. The CP's responses to the NFA Letter are attached as Appendix A to the NFA Addendum.

The property of the voluntary action and for which the NFA letter applies is that 0.625-acre property described as 55-63 Graceland Blvd., Columbus, OH 43214. The property consists of the former Swan Cleaners locations at Graceland Shopping Center in northern Columbus, Ohio. The former dry cleaners spaces therein comprised the addresses 55, 57 & 59 Graceland Blvd. These units were in the eastern end of the southeastern Graceland Shopping Center retail strip building. The property is approximately 600 ft. west of North High Street in northern Columbus, Franklin County, Ohio. The Property was defined as 0.625-acres as shown in Figure 1A and described in the legal description in Appendix A provided in the Phase I PA report.

The activities conducted in support of the NFA letter and the NFA Addendum included Phase I and II Property Assessments and a Property Specific Risk Assessment (PSRA). These activities included collecting and chemically analyzing soil and groundwater below the property, modeling chemicals of concern (COC) in soil and groundwater, and preparing reports consistent with VAP rules in OAC 3745-300-06, 07 and 09.

The date of issuance of the NFA letter is March 3, 2004. The date of issuance of the NFA Addendum is May 19, 2004.

A complete copy of the NFA letter and the NFA Addendum can be obtained from the Volunteer, Graceland Shoppers Limited Partnership (191 W. Nationwide Blvd., Suite 200, Columbus, OH 43215, telephone 614-228-5331); and through the Certified Professional Bruce A. Savage, CPG, CP265, (c/o Geotechnical Consultants, Inc., 720 Greencrest Dr., Westerville, OH 43081, telephone 614-895-1400).

The legal description of the property is provided as an attachment to this NFA letter executive summary.



2.0 Summary of the No Further Action Letter

The concise summary of the basis for issuance of the NFA letter, including intended land use follows.

Documents used to support the NFA letter and NFA Addendum are:

Phase I Property Assessment report dated February 2, 2004; Phase II Property Assessment report dated March 3, 2004; and a Property Specific Risk Assessment report dated May 14, 2004.

2.1 Phase I Property Assessment

The purpose of the Phase I PA was to identify the history of the property use, the chemicals of concern (COC) associated with the property use, and the Identified Area on the property where impacts to the property by the COC occurred or were likely to be present.

The Phase I PA activities were performed between August 14, 2003 and February 2, 2004. The methods of the Phase I PA inquiry included those methods required by OAC 3745-300-06.

The property history was generally agricultural land until 1952, when the property and the adjoining properties were purchased by High Mart Inc. for development of Graceland Shopping Center. The center opened in 1954 and has operated continually since that time. The property itself was in the southeastern portion of the shopping center, and was occupied by Swan Cleaners from 1954 until 1998. Swan Cleaners performed dry cleaning in these spaces continually from 1954 until 1993; after 1993 the space was utilized for customer drop off and pick up only. They reportedly occupied these spaces for the following time intervals:

55 Graceland Blvd.	9/1/87 to 1/31/98
57 Graceland Blvd.	1/1/66 to 8/31/87
59 Graceland Blvd.	8/15/54 to 12/31/65

Subsequent tenants of these spaces including retail stores for clothing, teaching equipment/aids and furniture.

Three dry cleaning chemical releases were identified on the Ohio EPA - EROPIK database (state spills list) at the Swan Cleaners, 59 Graceland Boulevard. The first was a small spill that occurred on March 31, 1980, when Stoddard solvent leaked from a container outside. The land was listed as the only area affected. The second spill was from 3 gallons of tetrachloroethene on June 9, 1988. The spill was the result of human error and again, the land was affected. The third incident was reported as a tetrachloroethene odor with the source and cause unknown; therefore, the air was listed as the affected area.



One Identified Area (IA) was identified at the Property:

- IA-1: The rear of 55, 57 & 59 Graceland Blvd., which comprised the former dry cleaners locations.

Based on the findings of the Phase I PA, a Phase II PA was required before a No Further Action letter for this property can be issued by a Certified Professional to the VAP.

Based on information provided in the VAP Phase I Property Assessment, the subject property was determined to be eligible for the VAP consistent with OAC 3745-300-02. The VAP Phase I Property Assessment includes the results of database searches for state, federal and local regulatory agencies. All property is eligible for the VAP except as provided for in OAC 3745-300-02(C); if the exceptions do not apply to the property, the property is eligible for the VAP. Section 10.0 of the Phase I PA report contains the eligibility determination. Based upon the information presented in the Phase I Property Assessment, the subject property is eligible for the VAP.

2.2 Phase II Property Assessment

The purpose of the Phase II PA was to determine the concentrations and extent of COCs in soil and groundwater beneath the property. The Phase II PA was conducted between November 20, 2003 and February 29, 2004.

The activities conducted during the Phase II PA included collecting 20 soil samples between November 20, 2003 and January 16, 2004 and eight groundwater samples between December 8, 2003 and February 13, 2004. Groundwater at monitoring well MW-1 was initially sampled December 8, 2003 and re-sampled February 13, 2004. All laboratory chemical analysis was performed by Test America, Inc. of Dayton, Ohio, a VAP Certified Laboratory. Chemicals of concern (COC) in soil and groundwater were modeled using SESOIL and AT123D. Soil vapor and groundwater vapor intrusion into buildings was modeled using the Johnson and Ettinger (J&E) model from US EPA.

J&E and fate and transport modeling were refined and reports are provided in Appendices B and C in the NFA Addendum. The Property Specific Risk Assessment included the J&E modeling and is discussed below in Section 2.4.4.

2.2.1 Soil Investigation and Findings

Soils were investigated by drilled soil borings and direct push soil borings at the property, including eight direct push borings inside the shopping center building (SS-1 through SS-8), and eight drilled borings outside the building (EB-1/MW-1, EB-2 and EB-3, MW-2, MW-3, MW-4 and MW-5), five of which were completed as groundwater monitoring wells (MW-1 through MW-5).

Chemicals of concern for the property were volatile organic compounds (VOC), primarily the dry cleaning chemical tetrachloroethene (PCE) and its decomposition byproducts trichloroethene (PCE), cis-1,2-dichloroethylene (DCE) and trans-1,2-DCE. No vinyl chloride was detected in soils.

The concentrations of COCs in soil were below the VAP Generic Direct Contact Soil Standards (GDCSS) for residential land use, as shown below:

<u>COC</u>	<u>GDCSS</u>	<u>Maximum Concentration on Property</u>
PCE	130 mg/kg	82.0 mg/kg at inside boring SS-2
TCE	80 mg/kg	0.116 mg/kg at outside boring EB-1/MW-1
cis-1,2-DCE	760 mg/kg	4.18 mg/kg at outside boring EB-4
trans-1,2-DCE	1,500 mg/kg	0.111 mg/kg at outside boring EB-4

Minor concentrations of acetone (0.253 mg/kg at outside boring MW-3) and n-Hexane (0.025 mg/kg at outside boring EB-2) were detected in soils, but these concentrations were also well below their respective residential land use GDCSS (7,300 mg/kg and 71 mg/kg, respectively). No other VOCs were identified in soil on the property.

2.2.2 Groundwater Investigation and Findings

Groundwater in the uppermost saturated zone was investigated by installing five groundwater monitoring wells at the property, MW-1 through MW-5, which were completed at depths ranging from 10.5 ft. to 18 ft. below ground surface (bgs). Groundwater in the lower shale bedrock saturated zone was investigated at the source area by installing groundwater monitoring well MW-1A, which was completed at a depth of 36.3 ft. bgs.

The source area investigated was in the rear of the former dry cleaners, including behind the rear of the three commercial units that housed the former dry cleaners (55, 57 & 59 Graceland Blvd.) and the western adjoining unit (63 Graceland Blvd.)

Chemicals of concern in groundwater were VOC.

The uppermost saturated zone was indicated at depths between 8 and 12 ft. bgs. This depth was generally where the base of the glacial till soils met the top of the weathered Ohio shale bedrock. The shale was fractured to a depth of approximately 3-4 feet in the borings, and was hard and intact below these depths. The lower bedrock saturated zone was indicated at a depth of 32 feet in MW-1A in the source area within the unweathered Ohio shale.

Groundwater classification was required in accordance with OAC 3745-300-10 (Rule 10). The groundwater in the uppermost saturated zone was determined to be Class B, in accordance with OAC 3745-300-10. COCs identified in groundwater in the uppermost saturated zone were as listed in Table 2 of the Phase II Property Assessment. Groundwater in the uppermost saturated zone at MW-1 contained PCE and TCE at concentrations exceeding the UPUS.

The concentrations at MW-1 were:

<u>COC</u>	<u>UPUS</u>	<u>Concentrations measured at MW-1</u>
PCE	5 ug/L	114 ug/L (12/08/2003), 108 ug/L (02/13/2004)
TCE	5 ug/L	13.3ug/L (12/08/2003), 10.5 ug/L (02/13/2004)
cis-1,2-DCE	70 ug/L	39.6 ug/L (12/08/2003), 24.9 ug/L (02/13/2004)
trans-1,2-DCE	100 ug/L	3.0 ug/L (12/08/2003), 2.0 ug/L (02/13/2004)

The concentrations of the COCs in groundwater in the uppermost saturated zone on the property met the UPUS at the down-gradient monitoring well locations MW-2, MW-3 and MW-5, and in the up-gradient monitoring well location MW-4. No COC concentrations were identified in groundwater in the lower bedrock saturated zone in the source area measured at MW-1A, therefore groundwater in the lower saturated zone met the UPUS.

2.2.3 Surface Water and Sediment Investigation and Findings

The property contained no surface water or sediments; therefore, these media were not investigated.

2.2.4 Exposure Pathway Assessment

Pathways evaluated by the Phase II PA were:

Soils

- Direct contact soils by on-property workers and visitors within the 0-10 foot point of compliance (POC);
- Direct contact soils by on-property construction workers within and below the 0-10 foot point of compliance (POC);
- Soil to indoor air - inhalation of vapors released from soils containing volatile COCs that accumulate in indoor spaces impacting on-property workers and visitors; and
- Soils leaching COCs to groundwater resulting in on-property human exposures.

Groundwater

- Groundwater potable use by on- and off-property human receptors;
- Groundwater non-potable use by on- and off-property human receptors;
- Groundwater to indoor air¹ - inhalation of vapors released from groundwater containing volatile COCs that accumulate in indoor spaces impacting on-property workers and visitors and off-property workers, visitors and residents; and
- Migration of groundwater containing COCs to surface waters impacting off - property human receptors.

Surface Water

- Non-potable use exposures to surface water containing COCs from groundwater discharge impacting off-property human receptors.

The following pathways were eliminated:

- Sediment pathways do not exist on the property or the surrounding properties.
- All soil pathways off- property - no migration to off-property soils from on-property sources is anticipated;
- Soil ecological pathway-no significant ecological resources exist on the property or the adjacent properties;
- Groundwater to surface water on-property and off-property - the property contains no surface water; groundwater gradient is to the southwest and there are no streams down-gradient within 500 yards of the property;
- Potable use of surface water on-property and off-property - the property has no surface water and there are no surface water intakes within 500 yards of the property; and
- Non-potable use of surface water on-property and off-property - the property has no surface water and there are no surface water intakes within 500 yards of the property.

Pathway refinements are discussed in the Property Specific Risk Assessment report, provided as Appendix B of the NFA Addendum.

2.3 Determination of Applicable Standards

The applicable standards for direct contact with soils are the Generic Direct-Contact Soil Standards for Carcinogenic and Non-Carcinogenic Chemicals of Concern - Residential Land Use Category. Applicable standards are required for other pathways including the indoor air and the soil leaching to groundwater pathways. The applicable standards for the indoor air pathway were determined using the Johnson & Ettinger (V.4, April 2003) model. The applicable standards for the soil leaching to groundwater pathway were those identified in The Ohio EPA Derived Leach Based Soil Values (February 2002) for Soil Type III.

The applicable standards for groundwater are the Generic Unrestricted Potable Use Standards. The applicable standards for the indoor air pathway were determined using the Johnson & Ettinger (V.4, April 2003) model.

Applicable standards refinements are discussed in the Property Specific Risk Assessment report, provided as Appendix B of the NFA Addendum.

2.4 Determination of Compliance with Applicable Standards

All applicable standards were met with respect to soils. A groundwater use restriction was filed with the Franklin County Recorder's office on May 19, 2004 as an institutional control to prevent potable and certain non-potable exposure to groundwater not meeting the UPUS on the property.

Compliance with applicable standards with respect to all complete exposure pathways was demonstrated by the Property Specific Risk Assessment, provided as Appendix B of the NFA Addendum.

2.4.1 Data Analysis

The comparison of COCs to the applicable standards for soil direct contact and groundwater UPUS are presented in Sections 2.2.1 and 2.2.2 of this document.

For the soil to indoor air and groundwater to indoor air pathways, the Johnson & Ettinger model demonstrates that soil and groundwater below the property meet the applicable standards.

Fate and transport modeling of the COCs through the unsaturated zone to groundwater was performed using SESOIL (V. 6.2, 2004). Solute transport modeling in groundwater was performed using AT123D software. The SESOIL model results demonstrate that the COCs in soil are not transported to the shallow groundwater unit within 100 years, except for TCE. TCE does reach groundwater after about 65 years, but at levels that are well below the regulatory limit of 5 ug/L.

The results from AT123D model simulations indicate that under current conditions, the COCs in groundwater will not migrate further than 5 meters (15 feet plus or minus) from the source area at WM-1 within 100 years, and thus there will be no impact to off-property receptors. The COCs in groundwater within 10 meters (30 feet) from the source area at MW-1 are below practical detection limits.

Johnson and Ettinger (J&E) modeling, and fate and transport modeling were refined and reports are provided as Appendices B and C of the NFA Addendum. The Property Specific Risk Assessment (PSRA) included the J&E modeling and is discussed below in Section 2.4.4.

2.4.2 Compliance with Generic Numerical Standards (GNS)

The GNS were used for the direct contact soils pathway and the groundwater pathways. Soils below the property meet the GNS, while groundwater at MW-1 exceeded the GNS for PCE and TCE. The cumulative adjustment calculation for soil VOCs was made and no adjustment was necessary based on the calculations. The adjustment was not necessary for groundwater because the GNS were exceeded for PCE and TCE, and an institutional control to eliminate potable and certain non-potable exposure to groundwater was used (Appendix E of the NFA Addendum.)

The Property Specific Risk Assessment, provided as Appendix B of the NFA Addendum, includes multiple chemical cumulative adjustment calculations.

2.4.3 Property-Specific Risk Assessment Findings

Based on the findings of the Phase II PA, a Property Specific Risk Assessment (PSRA) was performed. The PSRA addressed evaluation of risk to residential receptors due to vapor intrusion into indoor air via basements, as well as cumulative risk for all receptors from all complete pathways (direct contact soil; soil to indoor air; groundwater to indoor air; construction and excavation worker direct contact soil and construction and excavation worker direct contact with groundwater).

In the PSRA, direct contact exposure pathways to soil were considered to be complete for the future unrestricted receptors (i.e., child and adult residents) at the Property. Comparison of the concentrations of chemicals of concern in soils at the site with the generic numeric standards for direct contact under an unrestricted land-use scenario indicate that no chemicals, either individually, or in combination, exceed the applicable standard used for comparison.

Groundwater use at the site is restricted through an enforceable deed restriction due to confirmed exceedances of the generic unrestricted potable-use standards beneath the site that preclude use of groundwater for potable-use purposes.

Inhalation of volatile chemicals in soils and groundwater migrating to indoor-air via basements were evaluated in the PSRA. This evaluation concluded that there are no unacceptable risks associated with volatile chemicals in soil or groundwater to receptors at the Property.

The PSRA demonstrated that no chemicals of concern detected in soil or groundwater at the site exceed the applicable standards, either individually or in combination. Thus, site-wide risks do not exceed the target risk of 1.0×10^{-5} or the target hazard quotient of 1.0.

Concentrations of chemicals of concern detected in on-site soils at the Property do not exceed the applicable direct contact standards either individually or in combination; thus, no engineering or institutional restrictions on soils are necessary under these scenarios.

Concentrations of chemicals of concern detected in groundwater at the Property do not exceed the applicable direct contact standards (inhalation of volatile chemicals and dermal contact with groundwater) relative to construction or excavation workers.

Concentrations of chemicals of concern detected in groundwater at the Property were compared to the Ohio Surface Water Quality Standard for the Olentangy River. No chemicals of concern detected in groundwater exceeded the applicable Ohio Surface Water Quality Standard; thus, no unacceptable risks are present for ecological receptors in the Olentangy River from the Property.

2.4.4 Determination of Whether Remedial Activities are Required

Based on the presence of shallow groundwater that exceeded the GUPUS at MW-1, a groundwater use restriction institutional control was necessary to achieve compliance with the applicable standard. Based on the PSRA discussed in Section 2.4.3 above, no other remedial activities were required.

2.5 Remedial Activities

The groundwater use restriction institutional control was applied to eliminate potable access to groundwater on the property to meet the applicable standard. Based on the PSRA discussed in Section 2.4.3 above, no other remedial activities were required.

2.6 Planned Remedies

No other remedies are necessary.

3.0 Conclusions

Based on the soil COC concentrations, the property meets applicable soil standards for unrestricted use to a point of compliance of 10 feet below ground surface, including residential land uses. Based on the groundwater COC concentrations, the property meets all applicable standards except the GUPUS for PCE and TCE, which were exceeded only at MW-1. The groundwater use restriction institutional control was applied to eliminate potable and non-potable groundwater use on the property, except to extract the groundwater as necessary in conjunction with construction activities, investigation or remediation of the groundwater. In addition, the Property Specific Risk Assessment (PSRA) demonstrates that COC concentrations in groundwater are protective considering potential direct contact exposures to groundwater by possible future construction and excavation workers on and off the Property. No other remedial activities were required.

The points of compliance for soil was 0-10 feet for property occupants, and the reasonably anticipated depths of excavation within and below the 0-10 foot depths for construction and excavation worker short term exposures.

In accordance with Rule 10(F)(6), the Class B groundwater on the property required a groundwater use restriction institutional control as a response requirement. Groundwater leaving the property complies with the UPUS.

Based on the Phase II PA and PSRA findings, the voluntary action remedy implemented by the groundwater use restriction institutional control is protective of human health and the environment. Based on the results of the Phase I and II Property Assessments and the Property Specific Risk Assessment, and following the implementation of the groundwater use restriction remedy, a No Further Action (NFA) Letter under Ohio VAP has been prepared for the Property. Therefore, the Volunteer has requested a Covenant Not to Sue (CNS) for the Property.

Attachment: Legal Description of the Property

0.625 Acres

Situated in the State of Ohio, County of Franklin, City of Columbus, lying in Farm Lot No. 18, Quarter Township 3, Township 2, Range 18, United States Military Lands, and being part of the 54.289 acre tract conveyed to Graceland Shoppers Limited Partnership, by deed of record in Official Record 08798 H16, (all references are to the records of the Recorder's Office, Franklin County, Ohio), and being more particularly described as follows:

Beginning, for reference, at a point in the original centerline of North High Street at the northeasterly corner of said 54.289 acre tract;

Thence South 03° 45' 00" West, a distance of 658.95 feet, along said original centerline of North High Street and easterly lines of said 54.289 acre tract and the 12.298 acre tract conveyed to Graceland Shoppers Limited Partnership, by deed of record in Official Record 15616 I03, to a magnetic nail set;

The following two (2) courses and distances continuing along the easterly lines of said 54.289 acre tract:

1. Thence North 85° 45' 00" West, a distance of 33.00 feet, to a magnetic nail set;
2. Thence South 03° 45' 00" West, a distance of 251.27 feet, to a magnetic nail set at a common corner of said 54.289 acre tract and the 0.623 acre tract conveyed to Thomas M. Thomas and Jerry L. Thomas, Trustees, by deed of record in Instrument Number 200102080026669;

Thence North 85° 48' 30" West, (passing an iron pin set at a distance of 276.42 feet) a total distance of 347.32 feet, along the southerly line of said 54.289 acre tract and northerly lines of said 0.623 acre tract and the 4.377 acre tract conveyed to Thomas M. Thomas, by deed of record in Official Record 00514 H02, to a point. Said point being the True Point of Beginning of the herein described tract;

Thence continuing North 85° 48' 30" West, a distance of 102.00 feet, along said line common to the 54.289 acre and 4.377 acre tracts, to a point;

The following three (3) courses and distances across said 54.289 acre tract:

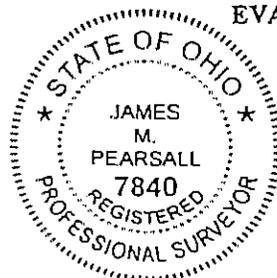
1. Thence North 04° 13' 37" East, a distance of 267.00 feet, to a point;
2. Thence South 85° 48' 30" East, a distance of 102.00 feet, to a point;
3. Thence South 04° 13' 37" West, a distance of 267.00 feet, to the True Point of Beginning. Containing 0.625 acres of land, more or less.

Subject, however, to all legal rights-of-way and/or easements, if any, of previous record.

Iron pins set, where indicated, are iron pipes, thirteen sixteenths (13/16) inch inside diameter, thirty (30) inches long with a plastic plug placed in the top bearing the initials EMHT INC.

The bearings shown hereon are based on the same meridian as the centerline of North High Street (South 3° 45' 00" West) of record in Official Record 00879 H16.

EVANS, MECHWART, HAMBLETON & TILTON, INC.



James M. Pearsall
James M. Pearsall
Registered Surveyor No. 7840

1/23/09
Date

Director's Final Findings and Orders
Former Dry Cleaners, Graceland Shopping Center
Columbus, Ohio
NFA Number 04NFA181

Exhibit 4
Declaration of Ground Water Use Restriction

DECLARATION OF GROUNDWATER USE RESTRICTION

This Declaration of Groundwater Use Restriction ("Declaration") is made as of the 19th day of May, 2004, by Graceland Shoppers Limited Partnership, an Ohio limited partnership, having its principal offices as 191 West Nationwide Boulevard, Suite 200, Columbus, Ohio 43215 ("Declarant").

WHEREAS, Declarant is the owner of that property more particularly described in Exhibit "A" attached hereto and made a part hereof, and depicted within the cross-hatched area on Exhibit "B" attached hereto and made a part hereof (the "Property"); and

WHEREAS, Declarant desires to establish a certain restriction upon the Property as a portion of the remedy under the Ohio Environmental Protection Agency ("Ohio EPA") Voluntary Action Program

NOW, THEREFORE, Declarant for itself, its successors and assigns, does hereby declare that the Property shall be subject to and shall be used in conformance with the following restriction and requirements:

1. No person shall use or extract the ground water located at or underlying the Property for any purpose, potable or otherwise, except, as necessary, for investigation or remediation of the ground water, or in conjunction with construction activities or maintenance of subsurface utilities.
2. This Declaration shall run with the land and shall be binding upon all current owners of the Property, and all successors and assigns of the Property, or any portion of the Property, including any leasehold interests on the Property or any portion of the Property.
3. Compliance with this Declaration may be enforced by a legal or equitable action brought in a court of competent jurisdiction by one or more of the following parties: (a) any party referenced in Paragraph Two of this Declaration; (b) Ohio EPA or its representative; or (c) any party with legal standing under applicable law. Any delay or failure on the part of any party to take action to enforce compliance with this Declaration shall not bar any subsequent enforcement with respect to the noncompliance in question and shall not be deemed a waiver of the right of any party to take action to enforce any noncompliance.
4. Pursuant to Ohio Revised Code ("ORC") 3746.05, if the Property or any portion of the Property is put to a use that does not comply with this Declaration, the Covenant Not to Sue issued for the Property by Ohio EPA under ORC 3746.12 is void on and after the date of the commencement of the noncomplying use.
5. This Declaration shall be recorded in the same manner as a deed in the Office of the Recorder of Franklin County, pursuant to ORC 3746.10(C) and 317.08(A), and shall be deemed incorporated by reference in any instrument hereafter conveying any interest in the Property or any portion of the Property.
6. If any one or more provisions of this Declaration is found unenforceable in any respect, the validity, legality, and enforceability of the remaining provisions shall not in any way be affected or impaired.
7. This Declaration shall be governed by and interpreted in accordance with the laws of the State of Ohio, including ORC Chapter 3746 and OAC Chapter 3745-300.
8. All headings used herein are for convenience and shall not be used to interpret or qualify the terms of this Declaration.

6242

Connor Land Title Box

TRANSFERRED,
NOT NECESSARY.
MAY 20 2004
JOSEPH W. TESTA
AUDITOR

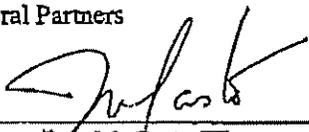
CONVEYANCE TAX
EXEMPT
JOSEPH W. TESTA
FRANKLIN COUNTY AUDITOR

9. Each instrument hereafter conveying any interest in the Property or any portion of the Property shall contain a recital acknowledging this Declaration and providing the recording location of this Declaration upon such conveyance substantially in the following form: "The real property described herein is subject to that certain Declaration of Ground Water Use Restriction made by Graceland Shoppers Limited Partnership, and recorded with the Office of the Recorder of Franklin County on the ___ day of March, 2004 in Franklin County Deed Records, Document Number _____ as if the same were fully set forth herein."

IN WITNESS WHEREOF, the undersigned has executed this Declaration as of the day and year above set forth.

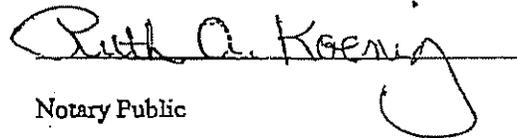
DECLARANT:

GRACELAND SHOPPERS LIMITED PARTNERSHIP, an Ohio limited partnership, by its General Partners

By: 
Don M. Casto III

STATE OF OHIO)
COUNTY OF FRANKLIN) ss:

On this 19th day of ^{May}~~March~~, 2004, before me, a Notary Public, in and for said County, personally came Don M. Casto III, who, being by me duly sworn, did depose and say that he is the General Partner of GRACELAND SHOPPERS LIMITED PARTNERSHIP, the partnership described in and which executed this instrument as Landlord, and that he executed this instrument on behalf of and in the name of such partnership.


Notary Public

RUTH A. KOENIG
NOTARY PUBLIC, STATE OF OHIO
MY COMMISSION EXPIRES 07-29-06

EXHIBIT "A"

Situated in the State of Ohio, County of Franklin, City of Columbus, lying in Farm Lot No. 18, Quarter Township 3, Township 2, Range 18, United States Military Lands, and being part of the 54.289 acre tract conveyed to Graceland Shoppers Limited Partnership, by deed of record in Official Record 08798 H16, (all references are to the records of the Recorder's Office, Franklin County, Ohio), and being more particularly described as follows:

Beginning, for reference, at a point in the original centerline of North High Street at the northeasterly corner of said 54.289 acre tract;

Thence South $03^{\circ} 45' 00''$ West, a distance of 658.95 feet, along said original centerline of North High Street and easterly lines of said 54.289 acre tract and the 12.298 acre tract conveyed to Graceland Shoppers Limited Partnership, by deed of record in Official Record 15616 I03, to a magnetic nail set;

The following two (2) courses and distances continuing along the easterly lines of said 54.289 acre tract:

1. Thence North $85^{\circ} 45' 00''$ West, a distance of 33.00 feet, to a magnetic nail set;
2. Thence South $03^{\circ} 45' 00''$ West, a distance of 251.27 feet, to a magnetic nail set at a common corner of said 54.289 acre tract and the 0.623 acre tract conveyed to Thomas M. Thomas and Jerry L. Thomas, Trustees, by deed of record in Instrument Number 200102080026669;

Thence North $85^{\circ} 48' 30''$ West, (passing an iron pin set at a distance of 276.42 feet) a total distance of 347.32 feet, along the southerly line of said 54.289 acre tract and northerly lines of said 0.623 acre tract and the 4.377 acre tract conveyed to Thomas M. Thomas, by deed of record in Official Record 00514 H02, to a point. Said point being the True Point of Beginning of the herein described tract;

Thence continuing North $85^{\circ} 48' 30''$ West, a distance of 102.00 feet, along said line common to the 54.289 acre and 4.377 acre tracts, to a point;

The following three (3) courses and distances across said 54.289 acre tract:

1. Thence North $04^{\circ} 13' 37''$ East, a distance of 267.00 feet, to a point;
2. Thence South $85^{\circ} 48' 30''$ East, a distance of 102.00 feet, to a point;
3. Thence South $04^{\circ} 13' 37''$ West, a distance of 267.00 feet, to the True Point of Beginning. Containing 0.625 acres of land, more or less.

Subject, however, to all legal rights-of-way and/or easements, if any, of previous record.

Iron pins set, where indicated, are iron pipes, thirteen sixteenths (13/16) inch inside diameter, thirty (30) inches long with a plastic plug placed in the top bearing the initials EMHT INC.

The bearings shown hereon are based on the same meridian as the centerline of North High Street (South 3° 45' 00" West) of record in Official Record 00879 H16.

EXHIBIT "B"

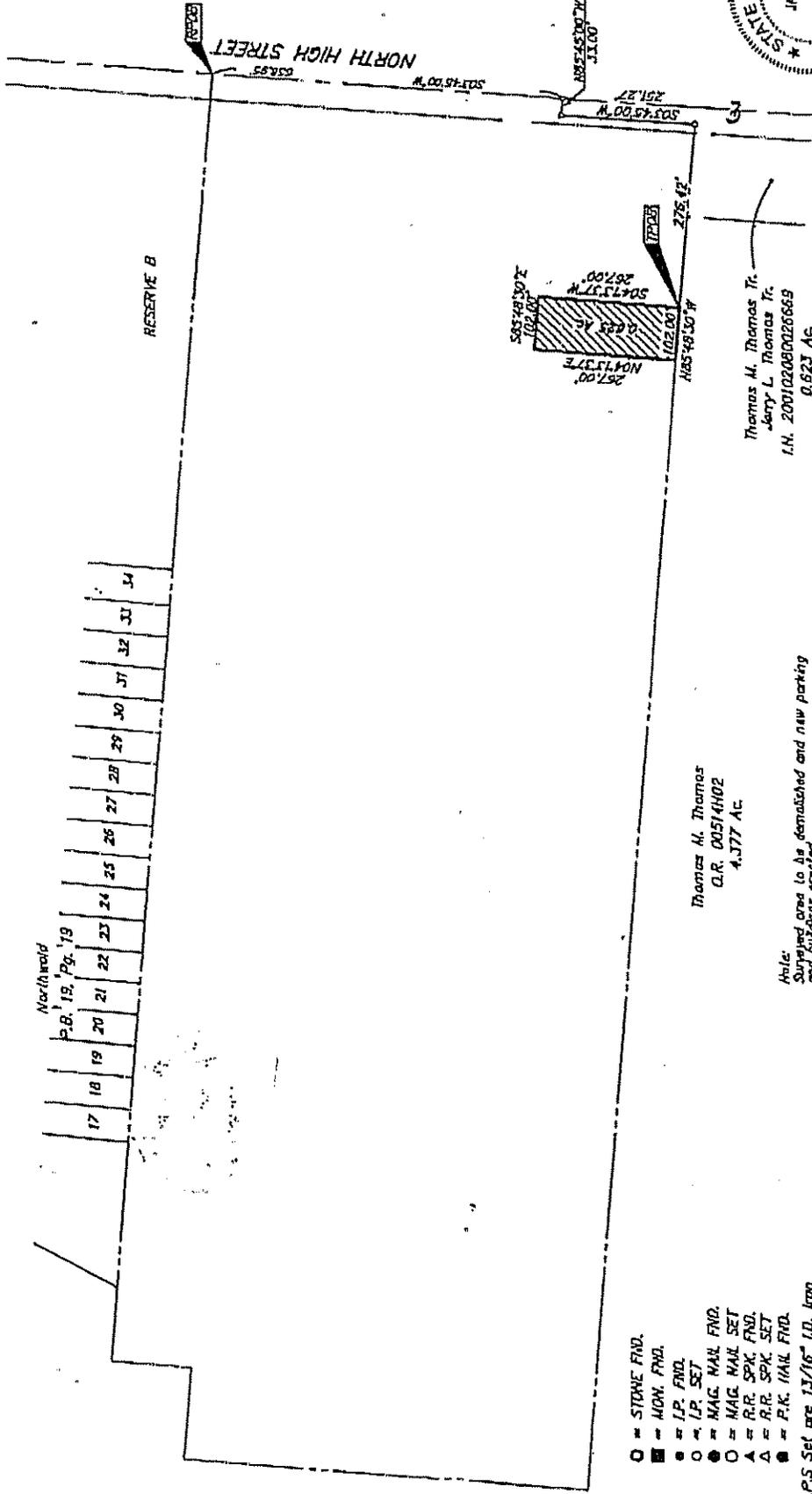
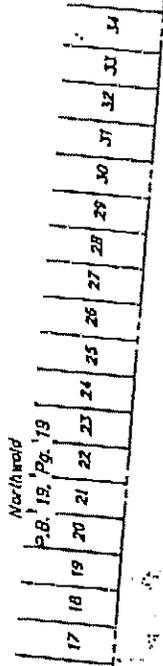
SURVEY OF ACREAGE PARCELS

LOCATED IN
 FARM LOT 18, QUARTER TOWNSHIP 1, TOWNSHIP 2, RANGE 18
 UNITED STATES MILITARY LANDS
 CITY OF COLUMBUS, FRANKLIN COUNTY, OHIO

JANUARY 21, 2004

PROFESSIONAL SURVEYOR
 JAMES M. PEARSALL
 7840
 REGISTERED PROFESSIONAL SURVEYOR

SCALE 1" = 200'



By *J. Pearsall*
 Professional Surveyor No. 7840

- = STONE FND.
- = IRON FND.
- = I.P. FND.
- = I.P. SET
- = MAG. NAIL FND.
- = MAG. NAIL SET
- ▲ = R.R. SPX. FND.
- △ = R.R. SPX. SET
- = P.K. NAIL FND.

L.P.S. Set are 1 1/16" I.D. Iron pipe w/ cap inserted ENHT RIC

GRAPHIC SCALE
 (IN FEET)

Note:
 Surveyed area to be demolished and new parking and buildings erected.

Basis of Bearings
 The bearings herein are based on the same meridian as the bearings of North High Street (S 31° 45' 00" W) of record in OH 61816 Record 0739116

GRADED 1/10/07 2004/01/21/04/02/04/02/04