Ms. Elizabeth Sitterly  
Giddings and Lewis, LLC  
142 Doty Street  
Fond du Lac, Wisconsin 54936-0590

AND

Mr. James De Rosa  
Commissioner of Real Estate  
City of Cleveland - Mayor’s Office of Capital Projects  
601 Lakeside Avenue, Room 518  
Cleveland, Ohio 44144

AND

Mr. Michael Sussen  
6000 Carnegie LLC  
Sussen Self Storage and Truck Rental  
7460 Markell Road  
Waite Hill, Ohio 44094

Subject: Amended Post-Closure Plan, Giddings & Lewis, Cleveland, OHR 000005538 & OHR 000005546, Project/Site ID # 218-002961-001

Dear Ms. Sitterly, Mr. Rosa, and Mr. Sussen:

On July 17, 2015, Giddings & Lewis, Cleveland submitted to the Ohio Environmental Protection Agency (Ohio EPA) an amended post-closure plan for former underground storage tanks (USTs) located at 5800 and 6000 Carnegie Avenue, Cleveland, Ohio. One revision to this amended post-closure plan was electronically received on August 7, 2015. This revision contained the signed Sussen Letter of Responsibility.

The amended post-closure plan was submitted in order to demonstrate that Giddings & Lewis’ proposal for post-closure complies with the substantive requirements of Ohio Administrative Code (OAC) rules 3745-55-11, 3745-55-12, and 3745-55-18.

The owner or operator and the public were given the opportunity to submit written comments regarding the amended post-closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Based upon review of Giddings & Lewis’ submittal, I conclude that the amended post-closure plan for the hazardous waste facility at 5800 and 6000 Carnegie Avenue, Cleveland, Ohio, as
modified herein, meets the performance standard contained in OAC rule 3745-55-11 and complies with the pertinent parts of OAC rules 3745-55-12 and 3745-55-18.

The amended post-closure plan submitted to Ohio EPA on July 17, 2015, by Giddings & Lewis, Cleveland, including the subsequent revision received on August 7, 2015, is hereby approved with the following modifications and conditions:

- **Section 5.0 — Management of Waste - Ground Water Flow Direction (pg. 11):** The wording in the first sentence of the final bullet shall read, "In the ACL instances explored, the extent of transport for chlorinated hydrocarbons does not travel beyond East 55th Street to the west (approximately 1,000 feet)."

- **Section 9.6 — Vapor Protection Standards:** The U.S. EPA Vapor Intrusion Screening Level (VISL) Calculator shall reference the June 2014 or most current VISL version that is available.

- **Section 10.0 — Vapor Protection Standards (pg. 23):** Second sentence in first bullet shall read, "Soil vapor has been assessed, and the vapor levels of contaminants are greater than EPA Target Sub-slab values."

- **Section 12.0 — Schedule for Closure (pg. 25):** The following sentence is hereby added to this section, "The post-closure period began in November 2007."

- **Section 14.0 — Future Use Restrictions (pg. 26 and Appendix 8):** The first sentence of the first paragraph shall read, "Certain obligations will apply for future owners of the subject site."

A second paragraph shall be included in this section. It shall read, "A survey plat in accordance with OAC 3745-55-16, as well as a deed notice including restrictions in accordance with OAC 3745-55-19, will be submitted to the local land authority within 30 days of receipt of this approval." A copy of the survey plat and deed shall be submitted to Ohio EPA within 60 days of receipt of this approval.

- **Section 14.2 - Vapor Monitoring Estimated Costs (pg. 27 and Appendix 7 table):** Submit to Ohio EPA, within 30 days of receipt of this approval, a modified Section 14.0 - Financial Assurance and Appendix 7 table, which shall include the vapor monitoring estimated costs for the remainder of the post-closure care period.

The second sentence shall read, "Upon approval of this post-closure plan, the owner will demonstrate financial assurance through the issuance of an irrevocable letter of credit for the total dollar amount."

**Increased financial assurance:** Submit to Ohio EPA, within 60 days of receipt of this approval, the updated post-closure cost estimate and documentation of increased financial assurance.

- **Section 15.0 — Closure Certification (pg. 28):** The first paragraph of this section shall be deleted. It addresses the closure certification, which was submitted in November 2013 and approved in December 2013.

- **Appendix 1 - Owners Letter of Responsibility:** Submit to Ohio EPA, within 30 days of receipt of this approval, the signed letter of responsibility, identifying the City of Cleveland as
a responsible party for post-closure care on Cleveland's parcel (Parcel ID: 118-17-007; 5600-5800 Carnegie Avenue, Cleveland OH 44106). 

- Appendix 3 – Alternate Concentration Limit (ACL) table: Submit to Ohio EPA, within 30 days of receipt of this approval, the approved alternate concentration limits in tabular form, for inclusion in Appendix 3.

Compliance with the approved post-closure plan, including the modifications specified herein, is expected. Ohio EPA will monitor such compliance. Ohio EPA expressly reserves the right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved plan.

Please be advised that approval of this amended post-closure plan does not release Giddings & Lewis, Cleveland from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission, pursuant to Section 3745.04 of the Ohio Revised Code. 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 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of $70.00 (made payable to "Ohio Treasurer of State "), which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, Ohio 43215

When post-closure is completed, OAC rule 3745-55-20 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer that the facility has completed the post-closure care period in accordance with the approved post-closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to:

Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
Attn: Manager, ERAS
A copy should also be sent to:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
Attn: Conni McCambridge

If you have any questions about implementing this amended post-closure plan, please contact Conni McCambridge at (330) 963-1263.

Sincerely,

Craig W. Butler
Director

cc: D'Arcy J. Gravelle, Key Engineering Group, LTD.

ec: Rod Beals, DERR, NEDO
Harry Courtright, DERR, NEDO
Erik Hagen, DERR, CO
Rich Kurlich, DDAGW, NEDO
Conni McCambridge, DERR, NEDO
John Palmer, DERR, NEDO
Ohio EPA, CO, DERR (RCRA Info Data Entry) at: RCRAInfoData@epa.ohio.gov