SPARTAN APARTMENTS, LLC

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March 1, 2017

Gina Hayes Ohio Environmental Protection Agency Division of Drinking and Group Waters Southwest District Office 401 E. Fifth St. Dayton, Ohio 43010 Gina.Hayes@epa.com.gov

#### Re: Woodbury Apartments, Lead Mapping

Dear Gina Hayes:

The Woodbury Apartment community is located at 3781 Woodbury Road, Medway, Ohio 45341. The apartment community was built in 1965. The community is made up of a total of 7 buildings with 56 total units. There are three different apartment styles: (a) four 1 bedroom/1 bathroom, garden style units; (b) thirty-two 2 bedrooms/1 bathroom, garden style units; and (c) twenty 2 bedrooms/1.5 bathroom townhouse style units.

In December of 2010, Zeus Investments, Inc., an Ohio for-profit corporation, purchased the community from Town Properties Asset Management Co. LTD., acting as receiver for LaSalle Commercial Mortgage Securities Trust 2007-MF5. This was a receivership sale situation whereby the lender had taken the property back from the previous owner/borrower. Because of this untraditional acquisition, Zeus Investments, Inc. was never given many of the historical documents and blueprints that would traditionally accompany the sale of an apartment community. Therefore, Zeus Investments, Inc. had very little information about the property prior to its purchase.

In 2012 Zeus Investments, Inc. transferred the property to Spartan Apartments, LLC. The shareholders of Zeus Investments, Inc. have a familial relationship with the members of Spartan Apartments, LLC. Since 2010, Tom Fyffe has been the acting individual taking care of the

property's water system. Based on the personal knowledge of the members of Spartan Apartments, LLC, the main water system appears to be free of lead, and any new plumping issues have been corrected using plastic piping. Today, the owners of Spartan Apartments, LLC have no personal knowledge of lead based contaminates at the property. However, should Spartan Apartments, LLC ever learn of any contaminates, they will immediately update this report

In support of these finding, the following exhibits are attached to this letter: Exhibit A is a property site plan; Exhibit B is a map of the distribution system; and Exhibit C is the verification form for community public water systems.

Because it is practically impossible to determine the lead content of an installed fixture, fitting or pipe, it should be assumed that the manufacture or installation date is the primary indicator of the lead content. Therefore, the characteristics of buildings and piping solder or fixtures would be buildings in Ohio built prior to 1998 or that used plumbing material or solder manufactured before 1998 may have materials with greater than 8% lead and are at a higher risk of contributing lead to the drinking water than materials manufactured after 1998. In addition, buildings built and plumbing materials manufactured after 2014 were required to have less than 0.25% lead by weight and have the lowest risk for contributing lead to the drinking water. It should be noted however that, although prohibited, some use of leaded solder or leaded components may have occurred after the prohibitions.

SPARTAN APARTMENTS, LLC

By: Argeri A. Lagos Its: Managing Member

Exhibit A

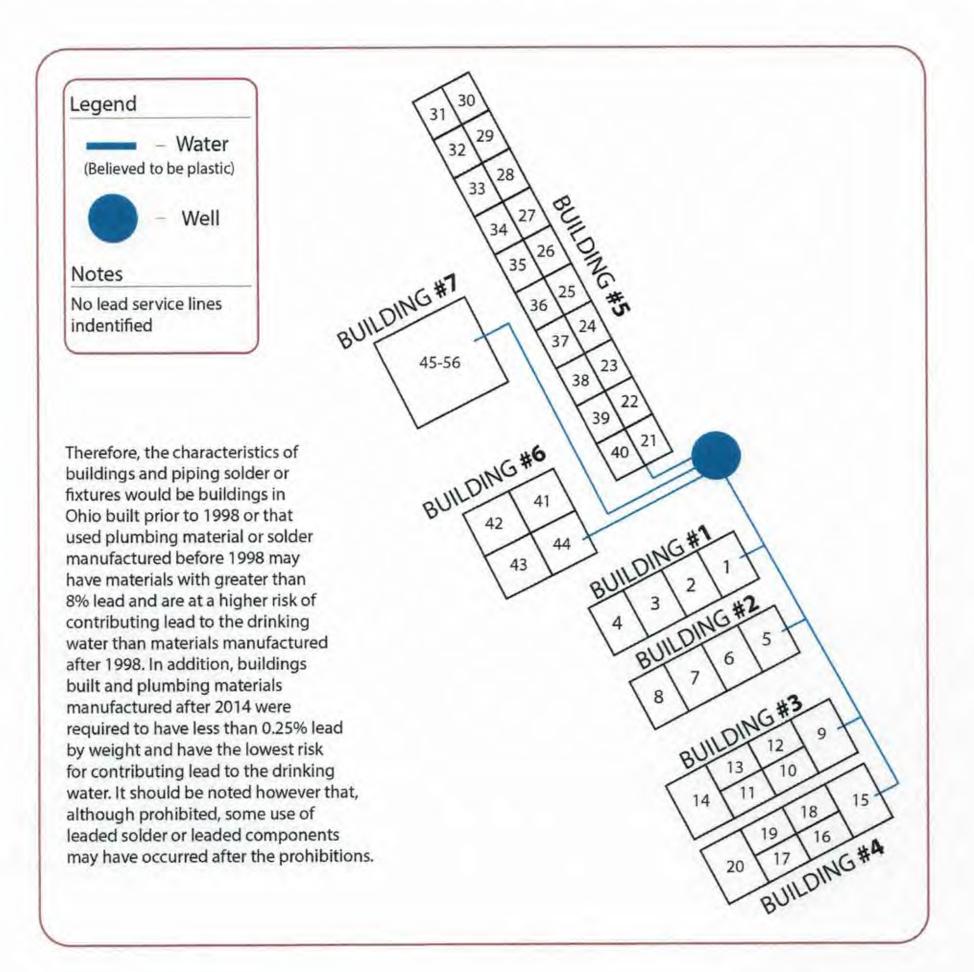
# 3781 Woodberry Rd Medway, OH



## SPARTAN APARTMENTS, LLC

Exhibit B

## 3781 Woodberry Rd Medway, OH



## SPARTAN APARTMENTS, LLC

### VERIFICATION FORM FOR COMMUNITY PUBLIC WATER SYSTEMS CLAIMING NO LEAD SERVICE LINES

The owner or operator of all community public water systems must identify and map areas of their distribution system that are known or are likely to contain lead service lines. Systems must submit a copy of the applicable map to the Ohio Department of Health and the Ohio Department of Job and Family Services. Systems must also submit a report to the director containing at least both of the following: (1) The applicable map with narrative, and (2) A list of sampling locations used to collect samples as required by Ohio Revised Code (ORC) Section 6109.121 and any rules adopted thereunder, including contact information for the owner and occupant of each sampling site.

Should a water system determine no lead service lines exist in their distribution system, they must provide information stating they reviewed, at the minimum, historical permit records and local ordinances, distribution maintenance records and information pertaining to installation dates or materials for all services lines. This information must be verified below.

I HEREBY CERTIFY THAT THE FOLLOWING METHOD(S) WERE USED TO DETERMINE NO LEAD SERVICE LINES EXIST IN THIS WATER SYSTEM'S DISTRIBUTION SYSTEM, AS REQUIRED BY ORC 6109.121(F):

This PWS states they have no lead service line reviewed the following information (select one following):	
<ul> <li>Historical permit records and/or local ordinal</li> <li>Distribution maintenance records (i.e. meter waterline break repairs)</li> <li>Information pertaining to installation dates (i.e. after 1986 when lead services lines we Service line material of all service lines is k service lines are known to be PVC)</li> </ul>	er replacement, for all service lines ere banned)
Ton Apartumore, LLL	PWS NAME: 120151
Levi A. Lacos Managin Martin d Name and Title of Responsible Person	PWS ID: OH COUNTY: Clark

Lead Mapping Verification Form Revised 2/14/17