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- Theresa L. Upton, Acting Corp. Clerk

THE LORAIN COUNTY LAND REUTILIZATION CORPORATION

To Whom It May Concern,

This document shall serve as the Narrative Information Sheet for the Lorain County Reutilization Corp. Grant Proposal for the FY2019 USEPA Brownfield Cleanup Grant.

- A. Applicant – Lorain County Land Reutilization Corporation, 226 Middle Ave, Elyria, OH 44035
- B. Funding Requested – (i) Grant Type: Single Site Cleanup, (ii) Federal Funds Requested: \$350,000
- C. Location – Lorain, County of Lorain, Ohio
- D. Property Information - 7450 Terminal Drive, Lorain 44053
- E. Contacts –

Project Director:	Head of Organization:
Pat Metzger	Jim Cordes
226 Middle Ave.	226 Middle Ave.
Elyria, OH 44035	Elyria, OH 44035
440-328-2326	440-328-5760
pmetzger@loraincounty.us	cordesj@loraincounty.us
- F. Population – Lorain, OH: 63,731 (2013-2017 ACS 5-year Estimate)
- G. Other Factors Checklist - See Attachment I
- H. Letter from the State - See Attachment II

Attachment I

Other Factors Checklist

Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	

Attachment II

Letter from the State



January 28, 2019

Matthew Didier
U.S. EPA Brownfield Contact, Region 5
Community and Land Revitalization Branch
77 West Jackson Boulevard
Mail Code SB-5J
Chicago, IL 60604-3507

Subject: Letter of Support for the Lorain County Land Reutilization Corporation - USEPA
Cleanup Grant proposal

Dear Mr. Didier:

This letter acknowledges that the Lorain County Land Reutilization Corporation (Land Bank) notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to submit a \$350,000 Cleanup Grant proposal to address the remediation needed at the E&L Transportation site at 7450 Terminal Drive, Lorain, OH. In 2017, seven underground storage tanks (USTs) were removed and one UST was closed-in-place at the facility. Extensive remediation is required to achieve "No Further Action" status for the facility. The Land Bank currently owns the property; they acquired the property from LORCO of Ohio in 2016. LORCO of Ohio and its operating entity, E&L Transportation, ceased operation in 2005. The Land Bank is securing the 20% cost share requirement from its Board and any cost overruns will be covered by the Land Bank. Additionally, the County Commissioners have already invested nearly \$160,000 in the site for the assessment and tank removal activities. The successful cleanup of the facility will allow the site to be more desirable and marketable to new business opportunities, bringing with them jobs.

I am pleased to offer BUSTR's support for Lorain County Land Reutilization Corporation's Cleanup Grant proposal. We look forward to working with the Lorain County Land Reutilization Corporation and the U.S.EPA on this project.

Sincerely,

Verne A. Ord
Assistant Chief - BUSTR
Division of State Fire Marshal
Ohio Department of Commerce

xc: Site File
James Cordes, Lorain County Land Reutilization Corporation

Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation for 7450 Terminal Drive Lorain, Lorain County, Ohio

I. Introduction and Background

a. Site Location

The site is located at 7450 Terminal Drive in Lorain, OH – comprising one parcel designated 01-00-010-00-006 (herein referred to as “the Site”).

b. Previous Site Use and previous cleanup/remediation

The Property was developed for agricultural purposes sometime prior to 1950, and redeveloped with the existing truck repair facility in 1958. The facility was occupied by E&L Transportation Company and utilized for truck repairs, refueling, and storage from approximately 1958 until December 2005, when the Property was left unoccupied.

Partners Environmental Consulting Inc. previously conducted a Phase I Environmental Site Assessment (ESA), a Limited Phase II Investigation, an Asbestos Survey, and tested samples of the water from the underground storage tanks (USTs) and the UST tank pits at the Property. These activities were documented in the following reports:

- *Phase I Environmental Site Assessment, E&L Transportation Facility, 7450 Terminal Drive, Lorain, Lorain County, Ohio* and dated May 6, 2016.
- *Limited Phase II Investigation, Former E&L Transportation Facility, 7450 Terminal Drive, Lorain, Lorain County, Ohio* and dated September 8, 2016.
- *Asbestos Survey, Former E&L Transportation Facility, 7450 Terminal Drive, Lorain, Lorain County, Ohio* and dated November 21, 2016.
- *Sampling & Analysis of Water from Underground Storage Tanks & Tank Pits, Former E&L Transportation Facility, 7450 Terminal Drive, Lorain, Lorain County, Ohio* and dated March 2, 2017.

During the course of these investigations, Partners was able to verify that eight (8) USTs, as well as five (5) product dispenser islands and associated underground product piping were present, but no longer in service on the Property. In August and September of 2017, UST closure and assessment activities were initiated at the Property. The UST systems (including the USTs, piping, dispenser islands, fuel ports, vent pipes, etc.) were removed or closed in place in accordance with applicable rules, and UST Closure Assessments were performed in accordance with 2017 BUSTR regulations.

c. Site Assessment Findings

The following is a summary of findings after reviewing the results of the UST closure assessments and recommendations for remedial actions:

UST System / Contents	Observations	Future Actions
UST-1 / New Oil	Soil test results are below the BUSTR UST Closure Action Levels	Anticipate No Further Action will be required by BUSTR
UST-2 / Used Oil	Soil test results are above BUSTR UST Closure Action Levels	Additional investigation and remedial actions will be required for an NFA
UST-3 / Used Oil – UST Closure in Place	Soil and groundwater test results are below the BUSTR UST Closure Action Levels	Anticipate No Further Action will be required by BUSTR
UST-4 / Gasoline	Soil test results are below the BUSTR UST Closure Action Levels	Anticipate No Further Action will be required by BUSTR
USTs-5, -6, & -7 / Diesel	Soil test results are below the BUSTR UST Closure Action Levels; however, results for pea gravel backfill material are above the BUSTR re-use action levels and this material remains in the lined tank pit	Additional investigation and remedial actions will likely be required for an NFA
UST-8 / New Oil	Soil test results are below the BUSTR UST Closure Action Levels	Anticipate No Further Action will be required by BUSTR

The results of the UST Closure Assessments indicate that UST systems UST-2 and UST-5, -6, & -7 impacted the Property such that remedial action is appropriate. Further activities are needed to progress through the BUSTR Corrective Action process with the intent of achieving NFA status. Prior experience at similar project sites suggest that BUSTR will assign separate Release Numbers unique to each UST for each system at the appropriate time.

d. Project Goals

The goal of this proposed cleanup is ensure the site meet applicable Bureau of Underground Storage Tank Regulations (BUSTR) standards so that a No Further Action (NFA) Letter can be issued by BUSTR. This NFA status will mitigate environmental liabilities and allow the site to more easily return to productive commercial use. We will actively pursue business to locate on the now clean site to bring much need jobs and investment.

II. Applicable Regulations and Cleanup Standards

a. Cleanup Oversight Responsibility

The cleanup will be overseen by the Ohio EPA and BUSTR.

b. Cleanup Standards for major contaminants

Risk-based cleanup standards will be generated for compounds of concern, in accordance with state regulations and BUSTR.

c. Laws & Regulations Applicable to the Cleanup

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, state environmental law, BUSTR regulations and town by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits (*e.g.*, notify before you dig, soil transport/disposal manifests) will be obtained prior to the work commencing.

III. Evaluation of Cleanup Alternatives

a. Cleanup Alternatives Considered

#1. No Action

Effectiveness – Not an effective means of controlling or preventing the exposure of receptors to contamination of the site.

Implementability – Easy to implement as no action will be conducted.

Cost – There will be no costs under this alternative.

Impact of Potential Extreme Weather Events – The continued presence of contamination could allow it to migrate or infiltrate groundwater.

#2. Encapsulation

Effectiveness – Encapsulation might be something considered under the Voluntary Action Program, but BUSTR's approach to corrective action includes evaluating the risks posed by the released chemicals of concern (COCs) using their risk-based tier evaluation process; and performing remedial actions and monitoring to ensure that the chemicals released do not pose an unacceptable risk to human health or the environment. Unfortunately the fill material in the large tank pit in the south portion of the Property is above the comparison standard for total petroleum hydrocarbons (TPH). Consequently, it is unlikely this solution will be sufficient for NFA status

Implementability– Capping is relatively easy to implement, although ongoing monitoring and maintenance of the cap will require periodic coordination and reporting.

Cost – Although typically a cost efficient remedy, due to the continuous monitoring and maintenance encapsulation would require, it is difficult to know costs projecting into the long term.

Impact of Potential Extreme Weather Events – The continued presence of contamination on the site as well as uncertainty as to the future maintenance and condition of the cap leave open the possibility of contamination migration or infiltration into groundwater levels.

#3. Dewatering, Excavation, Soil/Fill Material Removal & Disposal

Effectiveness – This remedy is an effective means of eliminating risk as the Site, since contamination will be removed and exposure pathways will no longer exist.

Implementability – Dewatering, excavation and removal/disposal of material is moderately difficult to implement. Some additional complication arises due to water in the tank pit which makes the remediation more difficult as it necessitates dewatering.

Cost – Total costs for the proposed dewatering, excavation and removal/disposal remedies are approx. \$380,000.

Impact of Potential Extreme Weather Events – This alternative is not susceptible to impact from potential extreme weather events since contamination would be removed from the site and replaced with clean material.

b. Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative #3: Dewatering, Excavation, Soil/Fill Material Removal & Disposal. Alternative #1: No Action cannot be recommended since it does not address site risks. Alternative #2: Capping is potentially less expensive than dewatering, excavating soils and disposing them offsite. However, Alternative #2: Capping would require ongoing monitoring and maintenance of the cap as well as being unlikely to meet standards needed for desired NFA status.