



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

April 19, 2021

Garrison Southfield Park LLC
c/o B. Venky Venkatesh, CHMM
Senior Project Director
EnSafe, Inc.
525 Vine Street, Suite 1755
Cincinnati, OH 45202

**Re: Closed Loop Refining & Recovery
Technical Assistance
Correspondence
RCRA C – Hazardous Waste
Franklin County
OHR000167718**

Subject: Final Closure Report for 1655 Watkins Road

Dear Mr. Venkatesh:

On April 17, 2020, Garrison Southfield Park LLC (Garrison) voluntarily submitted to the Ohio Environmental Protection Agency (Ohio EPA) a clean-up plan for the former Closed Loop Refining & Recovery, Inc. facility (Closed Loop) located at 1655 and 1675 Watkins Road, Columbus, Ohio. Garrison gave the public the opportunity to submit written comments regarding the clean-up plan via notification on Ohio EPA's website and publication in the Columbus Dispatch, and subsequently revised the plan accordingly.

On September 3, 2020, Ohio EPA notified Garrison that, based on our review of the clean-up plan and subsequent submittals, Ohio EPA believed that they addressed the administrative requirements of Ohio Administrative Code (OAC) Chapters 3745-65 and 3745-66 and the substantive requirements of OAC Chapters 3745-54 and 3745-55 and were consistent with 40 C.F.R. Part 300 of the U.S. Environmental Protection Agency National Contingency Plan (NCP).

On March 5, 2021, Ohio EPA received a final cleanup report from B. Venky Venkatesh, CHMM, with EnSafe, Inc. ("EnSafe"). Mr. Venkatesh is the On-Scene Coordinator for the former Closed Loop facility that operated at 1655 Watkins Road. Garrison, as the site owner, and EnSafe's Michael Johnson, a registered Ohio Professional Engineer, each certified that 1655 Watkins Road has been cleaned up according to the specifications in the clean-up plan and the substantive requirements of OAC rules 3745-55-11 through 3745-55-15. Clean up of 1655 Watkins Road was accomplished by the removal of cathode ray tubes (CRTs) and CRT-related materials from the warehouse and abatement of lead-containing dust inside the warehouse.

To verify Closed Loop's cleanup activities at 1655 Watkins Road, Andy Maneff from Ohio EPA's Central District Office, conducted several inspections of 1655 Watkins Road, including a final inspection on January 26, 2021. He also reviewed documents pertaining to the clean-up of 1655 Watkins Road and determined that the activities proposed in the clean-up plan were conducted adequately.

Based on this inspection and review, Ohio EPA concurs that Garrison has conducted activities in the warehouse at 1655 Watkins Road according to the clean-up plan and the substantive requirements of Ohio Administrative Code (OAC) rules 3745-55-11 through 3745-55-15.

Please be advised that Garrison's compliance with the clean-up plan does not discharge Garrison from any other obligations to investigate and possibly clean up contamination from all releases of hazardous waste or hazardous constituents at the facility, regardless of when the waste was placed in the unit. This requirement is known as RCRA Corrective Action. Ohio EPA expressly reserves the right to take action against Garrison pursuant to Chapter 3734 of the Ohio Revised Code and other applicable law to enforce compliance with the State of Ohio's hazardous waste laws and rules.

If you have any questions concerning the closure process or the status of the facility, please contact Andy Maneff by phone at (614) 728-3884.

Sincerely,

Melisa Witherspoon

Melisa Witherspoon, Chief
Division of Environmental Response and Revitalization

ec: Karl Heisler, Esq., King & Spalding LLP
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