

Division of Emergency and Remedial Response

VOLUNTARY ACTION PROGRAM

2006 ANNUAL REPORT



December 2007

Ted Strickland, Governor
Chris Korleski, Director

Photo on previous page: The former Empire Detroit Steel facility, prior to demolition.

2006 Voluntary Action Program Annual Report to the Legislature

Summary of Activities in 2006

- ✓ 25 No Further Action (NFA) Letters issued by certified professionals (CPs);
- ✓ 25 NFA Letters received a covenant not to sue (CNS);
- ✓ 552 acres were reported being cleaned up for possible redevelopment;
- ✓ The VAP initiated a scheduled five-year rule review;
- ✓ Three properties notified VAP of entry into the Superfund Memorandum of Agreement (MOA) track;
- ✓ Initiated audits of seven NFA Letters;
- ✓ Total program cost for 2006 was \$2.11 million.

Introduction

Ohio's Voluntary Action Program (VAP) was created in September 1994 and, with the adoption of rules, became fully implemented in early 1997. The program was created to allow companies a way to investigate possible environmental contamination, clean it up if necessary, and receive a promise from the State of Ohio (covenant not to sue or CNS) that no more cleanup is needed. Prior to the creation of this program, valuable land sat idle because fears of immense liability and cleanup costs scared off potential developers, businesses and banks. Some developers had abandoned plans to clean up their contaminated properties because Ohio EPA, which must focus its efforts on the worst sites, could not make those properties a priority. By creating this program, Ohio recognized the need to remove the environmental and legal barriers that stalled redevelopment and reuse of contaminated properties.

The program is getting sites cleaned up. In 2006 Ohio EPA received 28 NFA letter notices, 25 of which requested a covenant. Twenty-five NFA letters received a CNS, resulting in more than 552 reported acres being cleaned up for possible redevelopment that year. One NFA letter which did not request a CNS received a director's determination letter in accordance with Clean Ohio Fund requirements. This site had 1.24 acres cleaned up for redevelopment. One site was denied a CNS based on staff review of the NFA letter. CPs use the standards developed by Ohio EPA to clean up thousands of other sites that do not necessarily go through the formalized NFA letter process or get submitted for state liability release.

On July 31, 2001, Ohio EPA finalized and signed the Voluntary Action Program Memorandum of Agreement (MOA) with U.S. EPA. The MOA-Track program incorporates public involvement and up-front oversight into the existing VAP process. Volunteers who follow this track of the VAP will obtain both a CNS from Ohio EPA and comfort that U.S. EPA will not require any additional cleanup at the site. Three properties entered into the MOA track in 2006.

The VAP updated its fee rule in 2006. The program is intended to be funded through the fees which cover VAP products such as NFA review, operation and maintenance plans and agreements, certified laboratory and professional licensing. These fees had not been changed since December 1995. The VAP worked with the Multidisciplinary Board (MDB) to evaluate existing program costs and necessary fees to cover them.

The MDB is comprised of representatives from the departments of commerce, development, and health; representatives of the banking, manufacturing, utility, and real estate development industries, the regulated community, certified professionals, professions whose members have practical experience in the investigation or remediation of releases of hazardous substances or petroleum into the environment, municipal corporations, counties, townships, environmental advocacy organizations, and citizens organizations whose members are knowledgeable about the cleanup of sites. The MDG was created by statute to assist the Ohio EPA in developing and adopting the VAP rules.

As a result of this process, the VAP developed a tiered fee structure for the review of NFA letters, an alternative billable hours fee option for NFA letter review (called Pay-As-You-Go Option or PAYGO), and implemented an annual increase in the NFA letter review fee based on increases in the Consumer Price Index.

Previously, NFA letter reviews were charged one flat rate. Now, the fee is dependent on the complexity of the NFA letter. For example, the fee to review an NFA letter with a Phase I property assessment with no contaminant releases identified was \$2,800 in 2006. The fee to review an NFA letter with Phase I and Phase II property assessments, any risk assessment, and operation and maintenance plan and agreement was \$16,600.

Additionally, an alternative billable hours option called PAYGO was implemented. The volunteer submits an "Intent to Enter the VAP" letter to Ohio EPA along with an initial flat fee for an initial meeting and cost estimate for review of the site documents. The CP submits an NFA letter to the agency for a covenant only after this hourly rate-based review is completed.

The VAP initiated a scheduled five-year rule review in 2006 with help from the MDB. VAP staff and MDB members held meetings from May through December. They developed recommendations which will provide additional clarity to the technical rules and additional flexibility for volunteers and VAP CPs while maintaining, and in some cases enhancing, the protectiveness of VAP cleanups. The proposed rule revisions are now undergoing interested party review. After all interested party comments are taken into consideration, the proposed rule revisions will be filed with the Joint Committee on Agency Rule Review. Ohio EPA anticipates that the rule revisions will become final and effective in mid-2008.

U. S. EPA adopted its All Appropriate Inquiry (AAI) rule this year. AAI is essentially a regulation that describes how to conduct an initial, or Phase I as it is known in the environmental industry, site inspection. Performing an AAI can provide a person who is investigating and cleaning up a brownfield site with federal liability comfort or protection in many cases. Ohio EPA's VAP also has a Phase I rule which is very similar to the AAI and part of the VAP's voluntary cleanup requirements. The two rules differ on the federal government liability comfort/release and the state liability release. This year, the VAP completed and distributed guidance to interested parties clearly describing how and why the two rules are different and how to meet the requirements of one rule if a person has met the requirements of the other rule.

This report provides an update of the program activities for 2006. Please contact the Ohio EPA Voluntary Action Program at (614) 644-2924 with questions.

Definitions

VAP (Voluntary Action Program) - A program created to give companies a way to undertake a cleanup project and be assured the property meets specific environmental standards developed by Ohio EPA without direct oversight from the agency, and to receive a promise from the State of Ohio that no more clean-up is needed.

MDB (Multidisciplinary Board) - An advisory council created by statute that is comprised of representatives from a wide variety of groups knowledgeable about and vested in the cleanup of contaminated sites to assist the Ohio EPA in developing the VAP rules and standards.

NFA letter (No Further Action letter) - A document that describes any environmental problems found at the site, how those environmental problems were investigated and how the site meets applicable standards.

CP (Certified Professional) - A qualified, experienced professional such as an engineer, geologist or environmental scientist, who is certified by Ohio EPA to issue NFA letters

CNS (Covenant Not to Sue) - Legal action issued by the director of Ohio EPA that protects the property owner or operator and future owners from being legally responsible to the State of Ohio for further investigation and cleanup..

MOA (Memorandum of Agreement) - Agreement signed with U.S. EPA stating that sites cleaned under Ohio's VAP to also receive comfort that U.S. EPA would not ask for additional cleanup.

AAI (All Appropriate Inquiry) - Rule adopted by U.S. EPA that establishes environmental due diligence methods for investigating the previous ownership, uses, and environmental conditions of a property in order for purchasers to receive protection from federal clean up liability.

25 Properties Receive Covenants Not to Sue

During 2006, Ohio EPA issued 25 covenants not to sue (CNS). The following are some examples of sites that received a CNS.

Harrison West (Former A.C. Humko) – Columbus (Franklin County)

The 11.2-acre property had previously been used for a variety of industrial purposes, including the processing of crude vegetable oils into refined edible oil products, metal forging, lubricant and fuel refining and various other manufacturing purposes.

Chemicals of concern that were identified included volatile and semi-volatile organic compounds, including polynuclear aromatic hydrocarbons, metals, total petroleum hydrocarbons, and subsurface methane and hydrogen sulfide gases.



The property was approved for Clean Ohio Revitalization Fund funding and received \$3 million in matching funds. All existing buildings were demolished after asbestos removal. Modified soil vapor extraction was performed at the former acid plant area to remove

the methane and hydrogen sulfide gases that were believed to be formed from the release of acid and caustic liquids and fuel oil. Approximately 87,230 tons of contaminated soil were removed by excavation from the former acid plant and underground storage tank areas, and 2,316 tons of contaminated soil were removed from the former railroad spur area. In addition, 800 gallons of free phase petroleum product and ground water were removed from the excavation site.

The property meets VAP standards for residential land use and unrestricted potable use of ground water. The volunteer is constructing residential housing on the property.

Red Bank Road Property - Fairfax (Hamilton County)

The property consists of 35.53 acres that had previously been used as a manufacturing facility for Ford Motor Company. Areas that needed investigation included the assembly department, degreasing operations, heat treat area, chip handling area, underground storage tanks, drum storage area, PCB-containing electrical transformers, coal storage area, railroad sidings, plating line and building-wide sub-grade structures.

The site received funds from the Clean Ohio Revitalization Fund for remediation. Chemicals of concern included volatile and semi-volatile organic compounds, total petroleum hydrocarbons, metals and PCBs. Remediation of soil and ground water included excavation of soils and off-site disposal. During remediation, previously unknown basement substructures were discovered, which involved the excavation of an additional 24,000 tons of soil and 3,000 tons of concrete. During demolition and remediation more than 1.5 million tons of steel and 120,000 tons of concrete were recycled.

An environmental covenant restricts the land use to commercial and industrial, and restricts ground water extraction to investigation and remediation purposes. The owner intends to redevelop the site for commercial uses.



Cuyahoga County Youth Intervention Center - Cleveland (Cuyahoga County)

The property consists of 11.7 acres that had been used for industrial purposes from 1900 onward. From the early 1900s to the 1930s various industrial facilities occupied the property, including a foundry, a marble company and a car company. Subsequently, a beer production and distribution facility operated on the site. Brewery operations ceased in the mid-1980s and all buildings were eventually razed. PCB releases at the property were addressed by U.S. EPA.



The property was submitted under the MOA track and received extensive review by the agency prior to the submittal of the no further action letter. The cleanup was supported in large part through funding awarded under the Clean Ohio Revitalization Fund, as well as federal brownfield monies.

Areas that required investigation were underground storage tanks, oil storage tanks, crude oil tanks, historic foundry operation areas, historic railroad operation areas, metal pickling and enameling operations, areas with potential asbestos containing materials and polychlorinated biphenyls (PCB) areas. Chemicals of concern that were identified

included metals, polycyclic aromatic hydrocarbons and some volatile organic compounds.

Remedial actions included the removal and disposal of contaminated soil and water, as well as overlying subsurface foundations and debris, followed by backfill/restoration activities. The environmental covenant restricts use of the property as a juvenile detention center and to commercial and industrial workers. The Board of County Commissioners of Cuyahoga County intends to use the property to house the Cuyahoga County Youth Intervention Center which, among other things, will function as a temporary custody facility for juvenile offenders and a shelter care center for teens with special needs.

Former Empire Detroit Steel - New Boston (Scioto County)



Due to the size and complexity of the site, site ownership and funding issues, the site was parceled up into several NFA letters. Three of these received covenants in 2006.

The Wal-Mart parcel: The property consists of 25.3 acres used in the production of steel and coke for over 100 years. Steel production was conducted from 1894 to 1980 and coke production continued until 2002. The property has been vacant since 2002.

Several areas on the property required investigation: power substations, utility tunnel, blast furnace area, iron ore storage pit, slag storage area, coke plant, steam and boiler plants, transformer pad and water filtration system. Chemicals of concern identified included: volatile and semi-volatile organic compounds, poly-nuclear aromatic hydrocarbons, polychlorinated biphenyls and metals.

Remedial actions consisted of removal and disposal of contaminated soils, asbestos and a 10,000-gallon above ground storage tank, and placing two feet of clean soil over the property. The environmental covenant restricts the property to commercial / land use and prohibits the use of ground water. The Wal-Mart Corporation intends to use the property for commercial retail sales.

The electrical substation parcel: This property, which is a sub-parcel of the larger NFA Letter property, consists of 0.65 acres that were used for a former electrical substation to support the production of steel and coke. The property required investigation of soil

and ground water. Chemicals of concern identified included: metals, volatile and semi-volatile organic compounds, polychlorinated biphenyls and petroleum compounds.

Remedial activities at the property consisted of excavation and disposal of transformers, underlying gravel and the placement of two feet of clean fill. The environmental covenant restricts the property to commercial / industrial land uses and prohibits the use of ground water. The proposed use for the land is a parking lot.

The DLD One parcel: This portion of the property consists of 13.36 acres which was also used in the production of steel and coke. Several areas on the property required investigation: former blast furnace area, iron ore storage pit, slag storage area, the New Boston Coke plant and the east parking lot. Chemicals of concern identified included: volatile and semi-volatile organic compounds, poly-nuclear aromatic hydrocarbons, polychlorinated biphenyls and metals.

Remedial actions consisted of removal and disposal of contaminated soils, and placing two feet of clean soil over the property. The environmental covenant restricts the property to commercial / land use and prohibits the use of ground water.

Former Hobart Brothers Lagoon - Troy (Miami County)

The property consists of 4.5 acres that were used for various industrial activities for 30 years. Site activities included using the property as a source of gravel for testing dredging equipment, and for disposal of industrial wastes from the manufacturing of welding equipment and products.

Areas requiring investigation included the lagoon area and an up gradient off-site area; a leaking waste oil underground storage tank from the off-site property; the lagoon; fill; and ground water on the site. Chemicals of concern included petroleum products, volatile and semi-volatile organic chemicals, pesticides, herbicides, polychlorinated biphenyls and metals.



Remedial actions consisted of draining and filling the lagoon, and installing an engineered cap over the former lagoon. The environmental covenant restricts the property to recreational land use and prohibits the use of ground water and the construction of buildings on the site. The City of Troy intends to use the property for green space and as a park with a bike path.

Summary of Covenants not to Sue Issued in 2006

Name:	NFA Number/ Type	NFA received:	CNS issued:	Address:	Ohio EPA District	Volunteer	CP name (#)	Acres
Harrison West	06NFA231/ 90 Day	3/9/2006	9/13/2006	525 W First Ave, Columbus, Franklin Co	C	Royal Tallow Holdings Ltd & Harrison Park Dev Ltd	Atul Pandey (231)	10.7
Argo Tech Corp Area F	02NFA152/ 90 Day	11/1/2002	12/29/2006	23555 Euclid Ave, Cleveland, Cuyahoga Co	NE	TRW Inc	Jeffrey D. DeLaet (257)	0.31
Cuyahoga Co Youth Intervention Ctr.	05NFA223/ 90 Day	12/28/2005	5/9/2006	9300 Quincy Ave, Cleveland, Cuyahoga Co	NE	Cuyahoga Co Bd of Commissioners	Craig A. Kasper (103)	11.93
Forest City Technologies Inc	05NFA221/ 90 Day	11/16/2005	3/6/2006	15657 Brookpark Rd, Brook Park, Cuyahoga Co	NE	Forest City Technologies Inc	Kevin M. Reaman (250)	3.11
Goodyear Stow Mold Plt (Former)	05NFA220/ 90 Day	11/16/2005	4/20/2006	4700 Hudson Dr, Stow, Summit Co	NE	Goodyear Tire & Rubber Co	Jim C. Smith (121)	68.92
Hinkley Lighting	05NFA208/ 90 Day	6/1/2005	4/24/2006	12750 Berea Rd, Lakewood, Cuyahoga Co	NE	Hinkley Lighting Inc	Steven M. Gross (192)	3.1
Hunter Mfg	05NFA218/ 90 Day	10/17/2005	3/6/2006	30525 Aurora Rd, Solon, Cuyahoga Co	NE	Hunter Mfg Co	Dan B. Brown (127)	6.54
Jamestown Village Plaza	06NFA228/ 90 Day	2/13/2006	7/25/2006	2656-2750 Mahoning Ave NW, Warren, Trumbull Co	NE	JVPLAZA LTD; P&S Equities Inc	Troy L. Schultz (244)	11.44
National Gypsum Co.	04NFA189/ 90 Day	11/10/2004	12/29/2006	504 Walnut St, Niles, Trumbull Co	NE	Brook Park City of	Michael J. Pardus (238)	10.29
Steelyard Commons Wal-Mart Parcel	06NFA247/ 90 Day	10/12/2006	12/15/2006	3341 Jennings Rd, Cleveland, Cuyahoga Co	NE	Steelyard Commons LLC	John T. Garvey (118)	19.7

Name:	NFA Number/ Type	NFA received:	CNS issued:	Address:	Ohio EPA District	Volunteer	CP name (#)	Acres
TRW Cleveland Valve Plt	05NFA204/ 90 Day	4/13/2005	3/27/2006	1455 E 185th St, Cleveland, Cuyahoga Co	NE	TRW Automotive U.S. LLC	William B. Lozier (135)	30.78
Kibby Corners Demolition	05NFA219/ 30 Day	10/19/2005	1/11/2006	702 to 704 S. Main St, Lima, Allen Co	NW	Lima City of	Thomas J. Mignery (125)	0.46
CSX Transportation Chillicothe Yard	00NFA102/ 90 Day	11/6/2000	5/18/2006	E of S 5th S and N of E 7th St, Chillicothe, Ross Co	SE	CSX Transportation Inc	Ronald F. Roelker (157)	9.55
Empire Detroit Steel Former/DLD One Sub- Portion	06NFA236/ 90 Day	5/30/2006	12/12/2006	4490 Gallia St, New Boston, Scioto Co	SE	DLD One LLC	Jim C. Smith (121); Timothy E. Walsh (159)	13.35
Empire Detroit Steel Former/Electrical Substation (Former)	06NFA235/ 90 Day	5/23/2006	12/13/2006	4502 Gallia St, New Boston, Scioto Co	SE	DLD One LLC	Jim C. Smith (121); Timothy E. Walsh (159)	0.65
Empire Detroit Steel (Former)/Future Wal-Mart Property	05NFA222/ 90 Day	12/21/2005	5/16/2006	4490 Gallia St, New Boston, Scioto Co	SE	DLD One LLC	Jim C. Smith (121)	25.78
4000 Red Bank Rd	06NFA233/ 90 Day	5/4/2006	9/13/2006	4000 Red Bank Rd, Fairfax, Hamilton Co	SW	Cincinnati Port of Development Auth; Red Bank Road LLC	Craig A. Kasper (103)	34.19
Deerfield Mfg Co. (Former)	05NFA205/ 90 Day	4/26/2005	3/10/2006	408 Fourth Ave, Mason, Warren Co	SW	DEFECO Inc	Donald A. Fay (254)	4.4
Fort Scott Property	05NFA217/ 30 Day	10/14/2005	4/18/2006	6762 River Rd, New Baltimore, Hamilton Co	SW	Fort Scott Development Co LLC	Michael D. Weinstein (126)	205.67
Hobart Bros Lagoon	06NFA224/ 90 Day	1/23/2006	8/28/2006	Btwn 439 & 507 N Elm St, Troy, Miami Co	SW	Hobart Brothers Co	Oren J. Gottlieb (123)	3.92
International Paper	05NFA211/ 90 Day	8/11/2005	1/26/2006	1830 Hamilton- Clevess Rd, Hamilton, Butler Co	SW	International Paper	Thomas J. Mignery	35.85

Name:	NFA Number/ Type	NFA received:	CNS issued:	Address:	Ohio EPA District	Volunteer	CP name (#)	Acres
McDonald Diane Property (Former)	06NFA230/ 90 Day	2/23/2006	4/28/2006	1712 King Ave, Kings Mills, Warren Co	SW	Kings Meadow Holdings LLC	Laura F. Funk (286)	18.99
Shoppes at Huber Heights	05NFA216/ 90 Day	9/26/2005	6/23/2006	6007-6119 Brandt Pke, Huber Hts, Montgomery Co	SW	General Electric Credit Equities Inc	James E. Zentmeyer (252)	3.15
SPECO Kelsey-Hayes Mfg Fac	06NFA238/ 90 Day	6/12/2006	10/25/2006	1205 W Columbia St, Springfield, Clark Co	SW	Springfield City of Office of City Manager	Craig A. Kasper (103)	5.76
Wright-Bernet Inc Fac	05NFA213/ 90 Day	8/19/2005	6/26/2006	3001 Symmes Rd, Hamilton, Butler Co	SW	Henkle Schueler & Assoc Inc	Walter K. Kosinski (196)	13.56

VAP Superfund Memorandum of Agreement Track

The MOA-Track program incorporates public involvement and up-front oversight into the existing VAP process. Volunteers who follow this track of the VAP obtain both a CNS from Ohio EPA and comfort that U.S. EPA will not require any additional cleanup at the site. Three properties entered the MOA Track in 2006. The existing VAP process, known as the Classic VAP Track, is also available to volunteers who do not feel the need for federal comfort and prefer not to incorporate up-front Agency oversight or public involvement into the voluntary cleanup process.

VAP staff created procedures and documents to assist volunteers and certified professionals through a voluntary action that meets both the traditional VAP requirements and the additional public involvement and Ohio EPA review requirements for the MOA track. Detailed information about the VAP's MOA-Track process, including a copy of the MOA between Ohio EPA and U.S. EPA, can be found on the program Web page at <http://www.epa.state.oh.us/derr/vap/moa/mo.html>.

Properties that Entered the MOA Track in 2006

Property Name, Address	Volunteer	Date Entered MOA Track
Norfolk Southern Rwy Co Bridge Yd Peninsula 5A, Columbus Ave & St Rt 531, Ashtabula, Ashtabula Co	Consolidated Rail Corp	3/24/2006
RiversEdge Redevelopment Project, 100 Riverside Dr, Hamilton, Butler Co	Hamilton Brownfields Redevelopment LLC	5/22/2006
Canton Drop Forging & Mfg, 101 11th St SE, Canton, Stark Co	City of Canton	9/6/2006

Audits of No Further Action Letters

Ohio EPA annually audits at least 25 percent of all No Further Action (NFA) letters submitted to the Voluntary Action Program in each calendar year. These audits can be limited to a review and analysis of the documents pertaining to the NFA letter to determine compliance with program requirements (Tier I Audit), or be expanded to include sampling and analysis of soils, surface water, air, sediments or ground water (Tier II Audit). Audits are conducted to determine if the properties meet applicable standards after completion of the remedial activities. Audits also are conducted to ensure that certified professionals and certified laboratories that performed work in support of the NFAs possess the qualifications necessary to perform work under the VAP and that their work results in NFAs that are consistent with applicable standards.

OAC 3745-300-14 describes the procedures for selecting and conducting audits of NFA letters. The rule establishes three “pools” of NFA letters to prioritize their selection for audits. These are the mandatory, priority and random audit pools. The *mandatory audit pool* includes NFA letters meeting one of six criteria that provide reason to believe the NFA letter was issued fraudulently or that performance of the certified professional who issued the NFA letter or the certified laboratory that performed analyses in support of the NFA letter was inadequate. The *priority audit pool* includes NFA letters that included a risk assessment or employed an engineering control (such as a fence) or institutional control (such as a deed restriction) as a remedial activity. The *random audit pool* includes all other NFA letters, including those from the priority audit pool that are not selected during the initial random selection as described below. Properties were selected according to criteria and procedures described in OAC 3745-300-14.

In addition to auditing all NFA letters in the mandatory audit pool, OAC 3745-300-14 requires Ohio EPA to audit at least 25 percent of NFA letters for properties where remedial activities occurred and 25 percent of those where no remedial activities occurred. Letters are randomly selected from the priority audit pool and the random audit pool to meet the 25 percent quota.

In calendar year 2006, the VAP initiated audits of seven of the 25 NFA Letters requesting a CNS that were submitted to Ohio EPA during the previous year (2005). The following table summarizes the name and address of the properties audited, the NFA number, the basis for selecting the property for audit and the status of the audit. The completed audits found the properties to be protective of human health and the environment.

NFA Letters Received in 2005 Selected for Audit in 2006

Property Name	Address	NFA No.	EPA District	Audit Pool	Status
GHR Foundry, Former	400 Detrick St, Dayton, Montgomery Co	05NFA206	SW	Priority	Completed
DAP Facility, Former	5300 Huberville Rd, Riverside, Montgomery Co	05NFA198	SW	Priority	Completed
Forest City Technologies Inc.	15657 Brookpark Rd, Brook Park, Cuyahoga Co	05NFA221	NE	Priority	Pending
Goodyear Stow Mold Plant, Former	4700 Hudson Dr, Stow, Summit Co	05NFA220	NE	Priority	Pending
TRW Cleveland Valve Plant	1455 E 185th St, Cleveland, Cuyahoga Co	05NFA204	NE	Priority	Pending
Mosler, Inc	1561 Grand Blvd, Hamilton, Butler Co	05NFA202	SW	Priority	Completed
Fort Scott Property	6762 River Rd, New Baltimore, Hamilton Co	05NFA217	SW	Random	Pending

VAP EXPENDITURES FOR CALENDAR YEAR 2006

PERSONNEL	2006
Fund 4R9 - VAP Fund	\$ 752,945.37
Hazardous Waste Management Fund (505)	\$ 106,386.71
General Revenue Fund (GRF)	\$ 0.00
Environmental Protection Fund (5BC)	\$ 544,793.32
U.S. EPA Grants (Federal dollars)	\$ <u>263,051.49</u>
Total Cost of Personnel	\$ 1,667,176.89
 MAINTENANCE COST OF THE PROGRAM	
Fund 4R9 - VAP Fund	\$ 173,514.18
Hazardous Waste Management Fund (505)	\$ 37,330.93
General Revenue Fund (GRF)	\$ 0.00
Environmental Protection Fund (5BC)	\$ 186,850.43
U.S. EPA Grants (Federal dollars)	\$ <u>12,562.83</u>
Total Cost of Maintenance	\$ 410,258.37
 EQUIPMENT	
Fund 4R9 - VAP Fund	\$ 0.00
Hazardous Waste Management Fund (505)	\$ 0.00
General Revenue Fund (GRF)	\$ 0.00
Environmental Protection Fund (5BC)	\$ 6,170.34
U.S. EPA Grants (Federal dollars)	\$ <u>0.00</u>
Total Cost of Equipment	\$ 6,170.34
 OTHER - CONTRACTUAL SERVICES	
Fund 4R9 - VAP Fund	\$ 17,886.05
Hazardous Waste Management Fund (505)	\$ 0.00
General Revenue Fund (GRF)	\$ 0.00
Environmental Protection Fund (5BC)	\$ 8,590.41
U.S. EPA Grants (Federal dollars)	\$ 3,559.32
Total Cost of Other Contractual Services	\$ <u>30,035.78</u>
 TOTAL VAP PROGRAM COST FOR CY06	\$ 2,113,641.38
 VAP REVENUE FOR CY05	
Certified Professional Fees	\$ 233,300.00
Certified Laboratory Fees	\$ 55,286.35
No Further Action (NFAs) Fees	\$ 122,600.00
Technical Assistance Cost Recovery	\$ 322,414.81
AGO Collected	\$ 0.00
Misc. - Intra-governmental, photocopying, etc.	\$ <u>4,950.00</u>
TOTAL REVENUE FOR CY06	\$ 738,551.16



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