



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

NOV - 9 2017

**CERTIFIED MAIL:**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:  
LU-16J

Justin Lichter, Project Manager  
Maple Street Commerce LLC  
c/o IRG Realty Advisors LLC  
21122 Donner Pass Drive  
Soda Springs, California 95728

Re: Approval of Revised Current Conditions Report  
RCRA-05-2016-0012  
Maple Street Commerce, 101 E. Maple, North Canton, Ohio  
OHD 004 462 131

Dear Mr. Lichter:

This letter approves the Current Conditions Report (CCR) Maple Street Commerce LLC (MSC) submitted on May 22, 2017, for the Hoover facility at 101 E. Maple, North Canton, Ohio, pursuant to paragraphs 15.a. and 27 of the *Administrative Order on Consent* (the AOC), RCRA-05-2016-0012, U.S. Environmental Protection Agency (EPA) executed with MSC on May 24, 2016, pursuant to Section 3008(h) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(h).

This approval relies on the information MSC has submitted on its own or through its consultant Hull & Associates (Hull), discussions held, and commitments to address certain comments in the upcoming RCRA Facility Investigation (RFI) Work Plan. EPA and MSC exchanged information and discussed the Current Condition Report on a number of occasions during the past year. MSC initially submitted a CCR pursuant to paragraph 15.a. on September 16, 2016. EPA held a meeting with MSC on January 30, 2017, to discuss comments. MSC submitted a revised CCR on May 22, 2017, and provided a supplemental Response to Comments (RTC) on August 8, 2017. On a call EPA and MSC held to discuss the revision on August 21, 2017, MSC indicated its RFI Workplan would provide additional information EPA requested on contaminant conditions and plans to demonstrate that the extent of contamination had been defined for all contaminants of concern. EPA held a follow-up call with Hull on September 6, 2017, to discuss past investigation work to facilitate the mapping of contaminant conditions, and met with MSC on September 26, 2017, to discuss the upcoming RFI work plan. Those discussions and documents reflect items MSC must include in its RFI Work Plan.

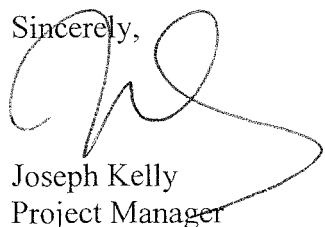
Paragraph 15.b.1. of the AOC requires MSC to submit an RFI work plan and QAPP within 90 days of this approval. Based on the language in the CCR and the August 8, 2017 RTC, the RFI work

plan, among other things, will summarize how the nature and extent of contamination has been delineated with existing information and/or will be delineated with supplemental investigation, discuss data gaps from the past investigations, and include a proposal for additional work to demonstrate that current and future exposures are under control for hazardous waste and hazardous constituents, including but not limited to VOCs and PCBs. The RFI (work plan) must also meet the requirements of paragraph 15.b.1.

Based on this information MSC provided and its representations that it will address certain information in the RFI Workplan, EPA finds that the revised CCR meets the requirements outlined in the EPA's May 1994 *Corrective Action Plan* guidance (OSWER Directive 9902.3-2A); and approves the CCR.

Thank you for your continuing efforts on this project. If you have any questions, please contact me at (312) 353-2111 or by e-mail at [kelly.joseph@epa.gov](mailto:kelly.joseph@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Joseph Kelly', with a long horizontal flourish extending to the right.

Joseph Kelly  
Project Manager

cc: Karyn Selle, Hull & Associates (by email)  
Mark Norman, Vorys, Sater, Seymour and Pease LLP (by email)  
Frank Lanterman, Maple Street Commerce LLC (by email)