



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

SEP 04 2019

REPLY TO THE ATTENTION OF:

LU-16J

**CERTIFIED MAIL: 7016 3010 0000 9203 1355**  
**RETURN RECEIPT REQUESTED**

Karyn Selle, Project Manager  
Maple Street Commerce LLC,  
c/o IRG Realty Advisors LLC  
4020 Kinross Lakes Parkway Suite 200  
Richfield, Ohio 44286

Re: Conditional Approval  
July 31, 2018 RCRA Facility Investigation Work Plan, Revision 1  
Maple Street Commerce, 101 E. Maple, North Canton, Ohio  
OHD 004 462 131

Dear Ms. Selle:

EPA has reviewed the *RCRA Facility Investigation (RFI) Work Plan (Work Plan), Revision 1*, dated July 31, 2018, Hull & Associates submitted on behalf of Maple Street Commerce, LLC (MSC). MSC submitted the Work Plan under the Resource Conservation and Recovery Act Section 3008(h) Administrative Order on Consent, RCRA-05-2016-0012, EPA executed with MSC on May 24, 2016 (the 2016 AOC). EPA approves the Work Plan with the following conditions, pursuant to Paragraph 27 of the 2016 AOC:

- 1) Groundwater sampling from proposed HSB soil borings is not proposed in Table 13 in the Work Plan, but the text indicates that groundwater sampling will be completed in those proposed borings where groundwater is encountered. This approval is conditioned upon the collection of groundwater from the proposed HSB soil borings when encountered based on the highest MIP readings.
- 2) The Work Plan indicates that soil borings along Maple will be advanced to bedrock, but does not specify the proposed depths for the remaining borings. This approval is conditioned upon the installation of soil borings that are terminated at bedrock at proposed locations along Orchard, in order to evaluate the vertical migration of contamination.

Pursuant to Paragraph 15.b.ii. of the 2016 AOC, MSC must submit the RFI report and risk assessment within 180 days of this approval letter. Pursuant to Paragraph 44.b., within 30 days of receiving this approval letter, MSC must submit an initial cost estimate for work to be performed

under the Order, including proposed investigation, risk assessment, interim/final corrective measures and long-term monitoring and system operation.

We appreciate MSC's continuing efforts to resolve these outstanding issues. 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,



Joseph Kelly  
Project Manager

cc: Lindsay Crow, Hull & Associates  
Justin Lichter, Maple Street Commerce, LLC  
Mark Norman, Vorys, Sater, Seymour and Pease LLP  
Frank Lanterman, Maple Street Commerce LLC