Lake County General Health District
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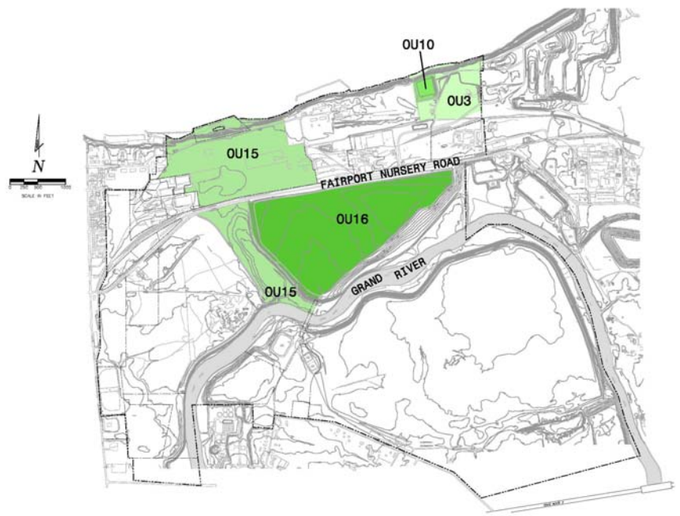
An Update From the Diamond Shamrock Community Relations Team

The Diamond Shamrock Community Relations Team (DSCRT) was established in October 1995 to inform the public about the Diamond Shamrock Painesville Works Site. The team, made up of representatives from Ohio EPA, Lake County General Health District, Lake County Utilities, the Painesville PRP Group, Hemisphere Corporation, public officials from the City of Painesville, Painesville Township and Fairport Harbor, and citizens from each of those communities, meets on a quarterly basis.

In this Edition....

Learn more about cleanup efforts at these Diamond Shamrock sites...



The Diamond Shamrock COMMUNITY RELATIONS TEAM

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The Diamond Shamrock Community Relations Team is a responsive community team dedicated to communicating information and addressing public concerns regarding the investigation of the Diamond Shamrock Painesville Works Site.

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OU3 and OU15 Public Hearings Planned

Ohio EPA will be holding a public hearing to accept comments on the Agency's preferred plans for Operable Units 3 and 15. The preferred plans outline Ohio EPA's proposal for remediation of the properties. This public hearing will be held at Painesville Township Hall, 55 Nye Road, on July 31, 2008, and will begin at 6:30 p.m. Comments may be provided in-person at the hearing or may be submitted in writing to Teri Heer, Diamond Shamrock Painesville Works Site Coordinator, Ohio EPA, at 2110 E. Aurora Road, Twinsburg, Ohio, 44087, or electronically at teri.heer@epa.state.oh.us. Written comments will be accepted through August 8, 2008.

Operable Unit 3 (OU3) is located in the northeastern corner of the former Diamond Shamrock Painesville Works Site ("Site"), adjacent to Lake Erie. This OU is approximately 25-acres in size and was not historically used for manufacturing or disposal purposes. Several access roads, leading to the One Acre Landfill (OU10) and to the CEI flyash disposal area (immediately east of the Site), cross OU3.

Sampling conducted during the Phase I and Phase II Remedial Investigations on OU3 revealed the presence of polycyclic aromatic hydrocarbons (PAHs) at concentrations in excess of acceptable residential risk-based standards. Ohio EPA's preferred remedial alternative includes remediating the contaminated soils to acceptable risk-based standards through removal and/or covering of the soils with a minimum of four feet of clean soils.

Operable Unit 15 (OU15) is approximately 102 acres in size and is located on the north central portion of the Site. This OU consists of the former main manufacturing area and Hydroretention basin, which directly discharged water into the Grand River. This OU is bordered by Lake Erie to the north and the Grand River to the south, and is bisected by Fairport Nursery Road. A variety of manufacturing and disposal activities took place within this OU, including the production of soda ash, carbon tetrachloride and electricity.

Investigations on OU15 revealed the presence of unacceptable concentrations of metals, polychlorinated biphenyls (PCBs), and volatile and semi-volatile organics (VOCs and SVOCs). A voluntary interim action was performed on OU15, with funding from Tierra Solutions, Inc., Lakeview Bluffs LLC, and the Clean Ohio Revitalization Fund. Contaminated soils were removed and/or covered with a minimum of two feet of clean soils in recreational areas and four feet of clean soils in residential areas, in order to limit direct contact by future residents and those engaging in recreational activities within the OU. Ohio EPA's preferred remedial alternative for OU15 includes the remediation of soils in the vicinity of the East Ohio Gas main, which could not be addressed during the voluntary interim action.

The Agency also proposes placing environmental covenants on both OU3 and OU15 in order to: limit the construction of habitable structures to certain portions of the OUs; prohibit the construction of crawl spaces and basement; prohibit the use of groundwater for drinking and other purposes; and require maintenance of two feet of clean soils in recreational areas and four feet of clean soils in residential areas. A risk mitigation plan will also be developed for both OUs, which will provide future site workers with information regarding site contamination and requirements for managing soils during subsurface work on the OUs.

The Preferred Plans for OU3 and OU15 are available at www.dscrt.com or in the document repositories for the Site, located at the Morley Library in Painesville, and the Fairport Public Library, in Fairport Harbor.

Redevelopment plans for these parcels include residential development on OU3 and a combination residential and commercial development on OU15, along with construction of a portion of the golf course and future IMG recreational facilities.

Get involved and learn more!

Visit *www.dscrt.com* for more information.

Specific Questions about the DSCRT can be emailed to LKUNS@LCGHD.ORG

DSCRT meetings are held quarterly at either the Lake County General Health District Offices or the Painesville Township Hall at 2:00 p.m. Meeting dates for 2008/2009 are:

- September 3rd
- December 3rd
- March 4th (2009)

Natural Gas Main to be Relocated

Contractors have begun relocating approximately 3,300 linear feet of a 20-inch diameter high pressure natural gas main that runs through areas OU15 and OU6. Because its current location is in an active construction area, this natural gas main is being permanently relocated outside the expected new development area. The majority of the work will be done between June 1 and August 15, 2008. Service disruptions are not anticipated during the course of the project. All of the gas main relocation work in this area is being done under the supervision of the Dominion East Ohio Gas Company and will be complete by October 2008.

Unique Streambank Restoration Project Enhances River Corridor

Tierra Solutions and Hemisphere Corporation are performing the cleanup and redevelopment of the Lakeview Bluffs site, which will ultimately include an IMG sports training facility and golf course, individual and cluster homes, trout club, vineyard, and a winery. Redevelopment work also includes the restoration of the stream bank area along the Grand River.

The banks in this portion of the Grand River are naturally steep. However, much of the bank within this project area consisted of constructed clay dike walls that were created to hold Solvay, a byproduct of soda ash manufacturing. In the process of transporting the Solvay along this dike, some of the material made its way onto the banks, giving them a characteristic white appearance.

Local residents used to call these Solvay-covered banks the "White Cliffs of Dover." But unlike the chalky soils that compose the famous English landmark – which offer spectacular habitat for rare flora and fauna – the Solvay that once covered these banks supported very little vegetation except invasive Phragmites. Much like the White Cliffs, though, the Solvay material easily eroded and was a key factor in the degradation of the streambank in this area of the Grand River.

As part of the streambank restoration process, the Solvay material was removed, and stable slopes with native vegetation, like that found in the surrounding river corridor, were created. The streambank restoration also included the development of a walking path that increases future public access to the Grand River. This work was performed with input from the Army Corps of Engineers, the Ohio EPA, and the Lake County MetroParks.

Harvard University Completes Case Study of Lakeview Bluffs Redevelopment

During a tour of the 1-acre test vineyard in April 2007, visiting scholars from the Harvard University School of Design decided to perform a case study of the Lakeview Bluffs redevelopment project. Representatives from Hemisphere Development LLC and Hull & Associates, Inc. worked with the professors and doctoral candidates from Harvard to provide the extensive project background and site history needed to evaluate the Lakeview Bluffs project for the case study.

"The Harvard University Graduate School of Design is world-renowned and extremely well-respected for its technical, social and political research associated with design and development projects," said Hemisphere CEO Todd Davis. "To have Harvard review this project from an educational and research standpoint is an incredible opportunity."

Doctor of Design candidate Andreas Georgoulias completed the case study in October 2007 under the supervision of School of Design professor Spiro N. Pollalis. The study itself has not only become a basis for class discussion at Harvard, it is drawing national attention from across the brownfield industry.

The 39-page study provides a comprehensive look at the historic operations on the property; the "mothballed" and underutilized condition of the site following the cessation of operations in 1976; the redevelopment proposal for the site; and the environmental assessment and remediation which will be required to ensure the property is safe for redevelopment.

Harvard is currently preparing to conduct an additional case study of Lakeview Bluffs specifically focused on risk communication. Work on this study is expected to begin in summer 2008. A copy of the October 2007 study is available on the DSCRT website at: www.dscrt.com.

OU10 Public Hearing Coming Soon

Ohio EPA will be scheduling the public hearing for OU10 in August or September 2008. Watch the DSCRT website and the News Herald for more details. Along with the details regarding the meeting, the Agency's preferred plan for the OU will be available at www.dscrt.com and in the Site document repositories.

OU16 Surface Improvements Work: Golf Course Base

Currently, surface improvements work is underway on OU16, the former chromate plant and chromium ore processing residue (COPR) disposal area, to establish the base for seven holes plus practice greens as part of the new golf course development. All work is being done in accordance with work plans approved by US EPA and Ohio EPA. This work includes installing an improved surface in the following three stages:

- Surface vegetation is scraped off and an additional tight clay layer is installed above the existing cap;
- Additional fill is installed above this tight clay layer to bring the surface to design grade, establishing the new golf course base; and,
- A new rainfall collection system will be installed and the new surface will be seeded to prevent erosion pending final construction of the golf holes.

These upgrades will significantly reduce the amount of water currently infiltrating through the existing cap and having the potential to impact both ground water and the Grand River. The target completion date for this work is fall 2008.

Approximately 100,000 cubic yards of clay will be used in the first tight clay layer, and about 400,000 cubic yards will be incorporated into the rest of the fill. In order to supply this much clean cover material, a former clay borrow pit on the south side of the Grand River on OU14 is being expanded in compliance with all applicable local and state requirements. To avoid hauling more than 33,000 heavy truckloads of clay on Painesville City streets, a new private bridge was built over the Grand River and a new gravel haul road was installed from the borrow pit to OU16.

COPR, the residual material from chromium chemicals production, was encountered during the course of installing the new Grand River bridge and installation of the new rainfall collection system in the southwest corner of OU16/OU20. The COPR contains significant amounts of hexavalent chromium, which is hazardous to human health and was the reason for the installation of the existing engineered cap over OU16 under an order with U.S. EPA in the 1980s. Because of concerns regarding the COPR, a portion of the new rainfall collection system in the southwest corner of OU16/OU20 had to be redesigned in order to maintain the required landfill cap thickness. Further investigations will be performed in OU20 to determine if additional COPR exists on that portion of the site. This additional investigatory work will be performed in two phases. The initial phase of sampling was completed in April 2008 and results will be available later this summer.

OU Status and Upcoming Activities

Operable Unit	Current Status	Upcoming Activities
OU1N-Lake	Feasibility Study Report approved by Ohio EPA. Information from the report will be incorporated into the preferred plans for OU3, OU10, OU18 and the Dartron Site.	No future activities planned.
OU1N-River	New consultant (Haley & Aldrich) just brought on board. Waiting for work plan for additional work.	PRPs will be performing additional ground water sampling within OU1N-River to evaluate potential remediation techniques in Summer 2008. Feasibility Study scheduled to be submitted in February 2009.
OU2 & OU6	Remediation has been completed and the PRPs recently performed confirmatory sampling. RMP and O&M plan currently undergoing review and revision.	Confirmatory sampling results will be submitted to Ohio EPA as part of a construction completion report in September 2008. Once completed, we will be moving the project from remedial to VAP for O&M.
OU3	Ohio EPA preparing the Preferred Plan.	Ohio EPA hearing on July 31, 2008 to accept public comment regarding proposed remedy. Public comment period will end on August 8, 2008.
OU4	Results from confirmatory sampling (following demolition of former pond) under review by Ohio EPA.	Boundary between OU4 and OU13 to be adjusted due to the presence of wastes from the former Painesville Township Landfill (OU13) onto property owned by Tierra Solutions, Inc. (OU4). Additional sampling to be scheduled to address a data gap in the area of the former pump house. Once complete, the FS report for OU4 will be submitted to the Agency for review.
OU5	PRPs recently completed additional sampling (due to placement of additional fill by former property owner).	Submittal of revised FS Report to Ohio EPA, including results from additional sampling, in Fall 2008.
OU7	PRPs currently preparing work plan for additional sampling to address data gaps within the OU.	Review and approval of work plan by Ohio EPA, followed by collection of additional soil and ground water samples by PRPs in late-Summer 2008.
OU8	No current activities.	No activities scheduled in near future.
OU9	PRPs evaluating data for use in the risk assessment for the property.	Submittal of the Feasibility Study and Baseline Human Health Risk Assessment to Ohio EPA in summer or fall 2008 for review and approval.
OU10	Ohio EPA currently drafting Preferred Plan.	Ohio EPA will schedule a hearing to accept public comments on the proposed remedy in August or September 2008.
OU11	No field current activities.	Feasibility Study to be submitted to Ohio EPA in June 2008 for review and approval.
OU12	Ohio EPA currently reviewing data from additional sampling adjacent to railroad tracks and proposal to split the railroad property from the remainder of OU12 into its own OU (OU22).	Feasibility Study to be submitted to Ohio EPA in July 2008 for review and approval.
OU13	Information response from Waste Management regarding historical disposal currently under review by Ohio EPA.	Determination by Ohio EPA regarding the need for additional data within the boundaries of the landfill.
OU14 & OU15	Additional sampling results currently under review by Ohio EPA.	No field activities scheduled in the near future.
OU15	Preferred Plan issued for public comment.	Ohio EPA hearing on July 31, 2008 to accept public comment regarding proposed remedy. Public comment period will end on August 8, 2008.
OU16	Upgrading engineered cap and storm sewers as part of golf course base construction.	Continued golf course base construction.
Dartron Site	Feasibility Study currently under review by Ohio EPA.	No activities scheduled in the near future.
OU18	Ohio EPA approved the work plan for additional sampling.	Collection of additional samples needed for preparation of the Feasibility Study.
OU20	PRPs continue to maintain ground water extraction system and dispose of contaminated ground water off-site. Construction of new access road on east edge of Site.	PRPs preparing work plan for additional waste investigation between OU16 and the Grand River. This investigation will be conducted this summer.
OU21	PRPs revising work plan for sampling of wetland area.	Collection of surface water and sediment samples within wetland area.