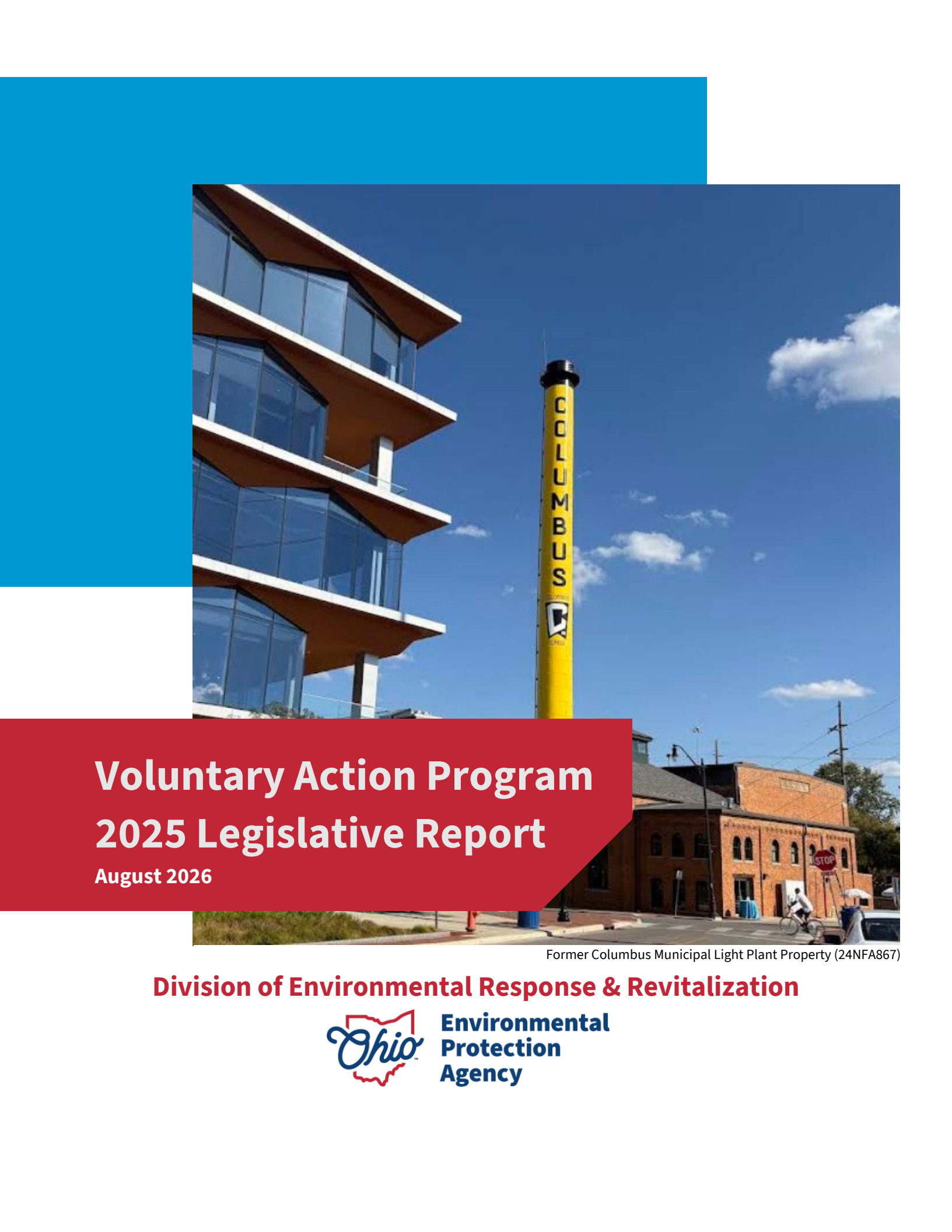




Voluntary Action Program 2025 Legislative Report

August 2026

Former Columbus Municipal Light Plant Property (24NFA867)

Division of Environmental Response & Revitalization



**Environmental
Protection
Agency**

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INTRODUCTION

Overview: Turning Liabilities into Assets

Ohio's VAP, established in 1994 and fully implemented in 1997 under Ohio Revised Code Chapter 3746, maximizes the reuse of contaminated properties by empowering participants to voluntarily investigate and remediate sites. Upon successful cleanup, the Ohio EPA issues a Covenant Not to Sue (CNS), protecting the property owner or operator and future owners from being legally responsible to the State of Ohio for further investigation and cleanup.

Prior to the VAP, valuable commercial and industrial land frequently sat idle. The fear of liability and unpredictable clean-up costs deterred developers, businesses, and lending institutions from revitalizing these sites. By removing these environmental and legal barriers, the VAP drives economic growth and safely restores blighted properties to productive use.

This report provides a regulatory and economic update on VAP activities for calendar year (CY) 2025.

2025 Performance & Economic Impact



\$321.9M+ Property
Valuation Exempted



404.1 Acres Safely
Remediated & Certified



27 NFAs Submitted/
30 CNSs Issued

Questions? Contact the Division of Environmental Response & Revitalization at 614.644.2924.

Ohio EPA's Mission:

***“Protect the environment
and public health by
ensuring compliance with
environmental laws and
demonstrating leadership
in environmental
stewardship.”***

SUCCESS STORIES & REVITALIZATION SPOTLIGHTS

Former Atlantic Foundry – Akron, Ohio

Historical Use

For more than a century, the Atlantic Foundry was a defining part of the community's industrial landscape. Built between 1910 and 1916, the facility grew into a sprawling metals-manufacturing complex with interconnected structures, fuel and oil tanks, pits, tunnels, and vaults. Like many legacy industrial sites, decades of heavy operations have left behind environmental uncertainty and deteriorating buildings that limit surrounding investment and pose potential risks.

Environmental Assessment and Remediation

Between 2021 and 2024, environmental assessments funded in part by Ohio EPA's Targeted Brownfields Assessment (TBA) Program identified small areas of petroleum-related chemicals and metals in soil and one groundwater well affected by an old tank. Soil gas or vapors beneath the property met commercial standards.

Clean-up work addressed these concerns head-on. Asbestos, chemical containers, old equipment, and oil-impacted water were removed; six underground storage tanks were excavated; and an abandoned tank and petroleum-impacted soils discovered during demolition were properly disposed of. Following cleanup, remaining soil and groundwater met Ohio's VAP standards for future commercial and/or industrial reuse. Ohio EPA issued the CNS on Nov. 10, 2025, giving the community regulatory certainty.

Current Use and Redevelopment

Today, the former Atlantic Foundry is almost unrecognizable. All dilapidated industrial buildings have been



Photograph 2 – The property after CNS issuance, 2026.

demolished, leaving an open property ready for new investment. While the cleared land may seem modest at first glance, it represents a dramatic improvement: unsafe structures are gone, contamination has been addressed, and the property is now a shovel-ready asset rather than a long-standing liability.

The Summit County Land Bank anticipates that the property will support the expansion of a neighboring business, creating new economic activity where blight once stood. The property is approved for commercial and/or industrial redevelopment, with land-use restrictions in place to ensure ongoing protection of public health.

Funding and Community Impact

More than \$120,000 in Ohio EPA TBA funding provided the



Photograph 1 – The Property prior to remediation, circa 1989.

Site Profile: Former Atlantic Foundry
Location: Akron, Summit County
Acreage: 7.05 Acres
Leveraged Funding: \$120,000 Ohio EPA TBA -> \$1.9M ODOD Grant
Project Outcome: Remediated blighted foundry; converted to a shovel-ready commercial asset.

Former Goodyear Akron Mix Center – Akron, Ohio

Historical Use

Located on River Street in Akron, this property first served residential purposes in the 1800s before transitioning to industrial use in 1915 when it was developed by the Goodyear Tire and Rubber Company. Over the next century, the property became a core asset for Goodyear's manufacturing operations. During World War II, the facility produced



Photograph 3 – The property mid- demolition in January 2024.
Courtesy of Mark Price, Akron Beacon Journal.

critical fuel cells and spreader fabric, and in later years, it was used to manufacture rubber cement. Goodyear officially ceased all operations at the property in 2016. By 2018, the property sat entirely vacant, leaving behind a complex industrial footprint immediately adjacent to the heart of the historic "Rubber Capital of the World."

Environmental Assessment and Remediation

Following the cessation of operations, the property's nine industrial buildings rapidly deteriorated into an unsafe, blighted condition. To eliminate structural hazards and mitigate legacy contamination, a comprehensive clean-up plan was launched under Ohio EPA's VAP. The intensive remediation process required professional abatement of asbestos-containing

Current Use and Redevelopment

Following the successful completion of the VAP cleanup and building demolition, the property was fully restored and is now maintained as a clean greenspace. While there are no immediate active redevelopment plans in place for the parcel, the victory lies in its pristine, "shovel-ready" status. By securing the CNS, the project has eased the historic environmental liabilities and regulatory uncertainties that typically deter developers from purchasing old industrial brownfields. The land has effectively been reset to a safe, certified green slate, perfectly positioned to attract and host Akron's next wave of economic or commercial development.

Funding and Community Impact

The transformation of the Goodyear Mixing Center highlights the power of targeted state support in revitalizing legacy industrial communities. The critical remediation and demolition phases were catalyzed by a \$6,426,130 Cleanup and Remediation Grant awarded to IRG Rubber City, LLC through the ODO's Brownfield Remediation Program in April 2022. This public investment successfully eliminated a sprawling, dangerous neighborhood eyesore and protected the surrounding urban environment from potential contaminant migration. By converting a century-old industrial liability into a guaranteed, risk-free asset, this project sets a powerful precedent for municipal renewal and long-term economic growth in Summit County.

Site Profile: Goodyear Akron Mix Center

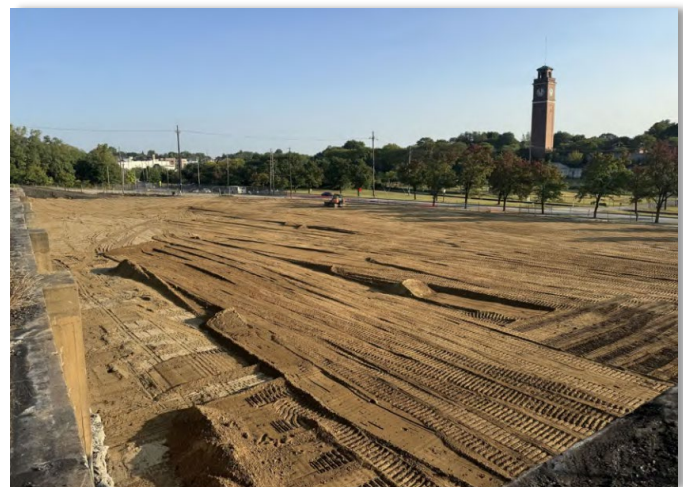
Location: Akron, Summit County

Acreage: 5.21 Acres

Volunteer: IRG RC Lessor LLC

Leveraged Funding: \$6,426,130 ODO Brownfield Remediation Grant

Project Outcome: Demolished nine unsafe buildings; restored to safe urban greenspace.



Photograph 4 – The now vacant property, taken during Phase I activities in January 2025.

WestBend - McKinley Ave. Dump / Huston Landfill – Columbus, Ohio

Historical Use

For nearly a century, this 50-acre property along the Scioto River accumulated a complex environmental legacy. Originally a residential plot in the 1930s, it transitioned into a deep limestone quarry in the late 1940s, creating the void that is now Larrison Lake. Once quarrying ceased, the city of Columbus and private haulers used the pits as an unlined municipal and industrial landfill from 1961 through 1970. From the mid-1970s until 2023, the northern portion operated as an automobile salvage yard. Decades of buried waste, scrap metal, and automotive fluids sat immediately adjacent to the Scioto River watershed, presenting a multi-generational environmental challenge.

Environmental Assessment and Remediation

Restoring this heavily contaminated brownfield required a rigorous cleanup under Ohio EPA's VAP.

Remediation began with demolishing four dilapidated salvage-yard buildings, followed by clearing and grading the landfill footprint. To eliminate the risk of direct human contact with buried waste, a clean soil cap was installed across the southern portion of the property. The property received a CNS, legally certifying it safe for restricted residential and commercial reuse. Ohio EPA issued the CNS on Nov. 10, 2025.

Current Use and Redevelopment

The property has officially shed its identity as a hazardous scrapyards and is undergoing a major master-planned transformation known as the WestBend development. This mixed-use project breathes new life into the riverfront corridor by turning a long-standing liability into a vibrant community hub. Once complete, WestBend will feature 750 modern multifamily residential units and 20,000 square feet of commercial office space, including a 10,000-square-foot music-industry business incubator built in partnership with the Columbus Music Commission. Additionally, a 12-acre public park will wrap around restored Larrison Lake, creating space for brand-new waterfront recreation in the community.

Site Profile: WestBend (McKinley Ave. Dump/Huston Landfill)

Location: Columbus, Franklin County

Acreage: 29.86 Acres

Project Outcome: Multi-phase cleanup; active transformation into a mixed-use neighborhood with 750 residential units, a music incubator, and a 12-acre park.



Photograph 5 – Aerial view of the property circa Fall 2024 from Thrive Companies.



Photograph 6 – The graded property sits vacant in December 2025, ready for redevelopment.

Funding and Community Impact

The revitalization of the McKinley Avenue Dump demonstrates how public funding can eliminate environmental blight and catalyze private investment. The project was kick-started with a \$10 million Cleanup and Remediation Grant from the ODOT's Brownfield Remediation Program. By de-risking the landfill's historical liabilities, this grant unlocked a massive private development that directly addresses local needs. The community impacts are substantial: the project shields the Scioto River ecosystem from polluted runoff, restores public waterfront access, and advances economic equity by reserving 20% of the 750 new housing units for affordable housing.

PROPERTY TAX ABATEMENTS (ORC 5709.87)

According to Ohio Revised Code 5709.87, parcels included in a CNS issued by the director of Ohio EPA are exempt from the increase in assessed value between the commencement of remedial activities and issuance of the CNS. The exemption allows for a 10-year abatement period. The following is a list of the counties with parcels eligible for tax exemption and the valuation exempted from real property taxation.

County	Number of Properties	Valuation Exempted 2025	County	Number of Properties	Valuation Exempted 2025
Adams	1	*	Lawrence	2	*
Allen	3	*	Lorain	12	*
Ashland	1	*	Lucas	13	\$0**
Ashtabula	3	\$0**	Madison	2	\$29,700
Auglaize	2	\$1,954,937	Mahoning	2	\$0**
Belmont	3	\$30,060	Marion	1	\$325,230
Butler	6	\$151,320	Medina	1	*
Carroll	1	\$328,895	Mercer	1	\$0**
Champaign	2	*	Miami	3	\$6,078,300
Clark	1	\$0**	Monroe	1	*
Columbiana	2	\$1,056,960	Montgomery	11	*
Crawford	2	\$0**	Muskingum	1	\$164,900
Cuyahoga	61	\$192,220,600	Ottawa	1	\$14,540
Darke	1	*	Pike	1	*
Defiance	1	\$167,380	Portage	4	*
Delaware	1	\$66,600	Putnam	1	\$379,240
Erie	4	\$0**	Richland	4	\$781,160
Fairfield	5	\$1,890,360	Sandusky	1	\$500
Franklin	41	\$86,356,700	Seneca	2	\$0**
Fulton	1	\$2,620	Stark	11	*
Geauga	1	\$0**	Summit	14	\$954,610
Hamilton	22	\$15,430,400	Trumbull	7	\$0**
Hancock	3	\$1,128,430	Van Wert	1	\$2,277,090
Henry	1	\$0**	Warren	2	\$9,782,580
Huron	1	\$87,140	Wayne	4	\$0**
Jackson	2	*	Wood	1	\$0**
Jefferson	5	*	Lawrence	2	*
Lake	5	\$212,060	Totals	288	\$321,872,312

*The county did not provide a report.

**Valuation is exempted by means other than ORC 5709.87.

SUMMARY OF 2025 CNS ISSUED

County	NFA #	Project Name	Address	Date Issued	Volunteer	Acreage
Allen	25NFA879	BP #69365 (fmr)	138 E. College Ave., Bluffton	6/17/2025	Remediation Mgt. Services Company (BP)	2.822
Clark	25NFA883	Greater Euclid Area	501-504 Euclid & 1029 S. Plum, Springfield	12/4/2025	Clark Co. Land Reutilization Corp. & City of Springfield	4.431
Cuyahoga	24NFA852	American Commodore Tuxedo (fmr)	4130 Mayfield Rd., South Euclid	1/24/2025	Shamrock Builders, Inc.	1.92
Cuyahoga	23NFA830	City View Center	5642 Transp. Blvd. & Vista Way, Garfield Hts.	2/3/2025	Highland Park Transportation, LLC	60.5868
Cuyahoga	23NFA831	National Foods Packaging	8200 Madison Ave., Cleveland	3/10/2025	National Foods Packaging, Inc.	0.99
Cuyahoga	23NFA828	Babbitt Rd. Expansion	1261 Babbitt Rd., Euclid	4/10/2025	ECCOZH2O, LLC	4.81
Cuyahoga	24NFA870	Ferry Cap & Set Screw	2151 Scranton Rd., Cleveland	7/17/2025	2151 Scranton Acquisition, LLC	3.665
Cuyahoga	24NFA873	Tech Park 90	21800 Tungsten Rd., Euclid	8/22/2025	Tungsten Industrial, LLC	26.53
Cuyahoga	23NFA837	MPC Plating	1827-1861 E. 63rd & 65th St., Cleveland	12/11/2025	The Cleveland Foundation	5.59
Fairfield	25NFA891	Commercial / Ellis Oil (fmr)	91 N. Center St., Pickerington	6/24/2025	Fairfield Co. Land Reutilization Corp.	0.75
Franklin	24NFA867	Municipal Light Plant	577-589 W. Nationwide Blvd., Columbus	3/17/2025	Municipal Light Plant, LLC	1.346
Franklin	22NFA813	Fortner Upholstering	2000-2060 S. High St., Columbus	3/18/2025	KDL Properties, LLC	5.73
Franklin	22NFA815	Dublin Cleaners	6845 Caine Rd., Columbus	6/3/2025	Northern Cleaners Inc.	0.957
Franklin	25NFA888	McKinley Ave Dump	2610 McKinley Ave., Columbus	11/10/2025	WestBend QOZB LLC	29.862
Hamilton	24NFA869	William Powell Co.	2503 Spring Grove Ave., Cincinnati	1/7/2025	Hamilton Co. Land Reutilization Corp. and Kao USA, Inc.	3.3
Hamilton	25NFA893	Lunkenheimer Property	1515 Tremont St., Cincinnati	11/10/2025	Hamilton Co. Land Reutilization Corp.	1.5

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County	NFA #	Project Name	Address	Date Issued	Volunteer	Acreage
Henry	24NFA874	Karl & Jans	570 Edgerton St., Hamler	2/11/2025	Henry Co. Land Reutilization Corp.	0.43
Lake	23NFA839	Painesville Hotel (fmr)	257 E. Main St., Painesville	3/10/2025	City of Painesville	1.9945
Lake	24NFA872	JTV Enterprises	1335-1389 W. Jackson & Corwin Dr., Painesville	7/29/2025	John T. Venaleck, Sr.	10.6034
Lorain	24NFA868	Lorain Pellet Terminal	203 Broadway, Lorain	3/17/2025	City of Lorain	20.118
Lorain	24NFA860	Shewango Valley High	745 Leo Bullocks Pkwy., Elyria	8/11/2025	Shewango Valley High, LLC	62.37
Lorain	24NFA853	Duffin Manufacturing	316 Warden Ave., Elyria	12/31/2025	The Chicago Faucet Company & Land Track Investments, LLC	5.0
Lucas	24NFA854	Jennison Wright Corp.	0 Broadway & 0 Waterworks Dr., Toledo	5/1/2025	Norfolk Southern Railway Company & APU Consolidated, Inc. c/o Blank Rome, LLP	22.81
Montgomery	24NFA863	Barney Rentals	8000 Brandt Pike, Huber Heights	5/1/2025	8000 Brandt Pike, LLC	1.17
Stark	24NFA864	Meijer Store 332	1505 N. Main St., North Canton	10/2/2025	Meijer Stores, LP	17.26
Stark	25NFA882	Republic Tech Reserve Iron	1451 Trump Ave. NE, Canton	10/14/2025	JBE Area 2, LLC	59.83
Summit	25NFA886	Goodyear Mix Center	1080 / 1140 River St., Akron	11/5/2025	IRG RC Lessor LLC	5.2072
Summit	25NFA894	Atlantic Foundry (fmr)	182 Beaver St., Akron	11/10/2025	Summit Co. Land Reutilization Corp.	7.0487
Trumbull	25NFA887	Leatherworks	1052 N. State St., Girard	8/11/2025	City of Girard	11.791
Warren	25NFA878	Undeveloped Property	Sutton Dr., South Lebanon	12/11/2025	Lebanon Mason, LLC	23.642

VAP MEMORANDUM OF AGREEMENT TRACK

The VAP Memorandum of Agreement (MOA) track integrates structured public involvement and up-front regulatory oversight into the standard VAP process. Volunteers who utilize this track receive dual benefits: a CNS from Ohio EPA and formal assurance from U.S. EPA that no additional federal cleanup will be required at the property. **In 2025, three properties entered the MOA track.**

Alternatively, the traditional "Classic" VAP track remains available to volunteers. This track is designed for participants who are not seeking federal liability assurance and prefer a streamlined process without mandated public involvement or up-front agency oversight.

Detailed information regarding the MOA track process, including the full agreement between Ohio EPA and U.S. EPA, is available in the agency's [Superfund MOA for the VAP fact sheet](#).

STATUTORY AUDITS OF NO FURTHER ACTION (NFA) LETTERS

To maintain strict environmental standards and ensure public health and safety, Ohio Administrative Code 3745-300-14 mandates that Ohio EPA audit at least 25% of all NFA letters submitted each calendar year that request a CNS.

The agency utilizes three distinct audit pathways to evaluate compliance:

- **Random Audits:** Formed annually from the pool of the previous CY's NFA submissions requesting a CNS.
- **Discretionary Audits:** Targeted reviews based on specific site complexities or program priorities.
- **Compliance Audits:** Evaluation of any property with an existing CNS, which can be conducted at any time to ensure ongoing adherence to environmental standards.

The Two-Tier Audit Process

Audits are executed using a structured, rigorous evaluation framework designed to confirm that cleanups safely meet Ohio's environmental laws:

- **Tier I Audit:** A comprehensive review and analysis of the NFA letter, all supporting technical documentation, and an initial physical property walkover.
- **Tier II Audit:** Conducted as needed following a Tier I review. This stage involves an in-depth physical inspection and field investigations (such as independent soil or groundwater sampling) to verify that all applicable remediation standards have been achieved.

While random audits strictly follow this two-tier progression, the program maintains regulatory flexibility to adapt or deviate from these exact procedures during discretionary and compliance audits, as site conditions dictate.

2025 Audit Performance & Status

For the 2025 reporting cycle, Ohio EPA initiated six audits of NFA letters requesting a CNS. As of July 2026, they are all undergoing active agency review.

The following table outlines the properties selected for audit, the administrative basis for their selection, and their current status.

NFA Letters Received & Selected in 2025 for Audit in 2026

County	Project Name	Address	Volunteer	NFA #	Audit Pool	Status
Trumbull	Ohio Leatherworks (fmr)	1052 N. State St., Girard	City of Girard	25NFA887	Random	Ongoing
Muskingum	BP Plant 69476	1619 Pershing Rd., Zanesville	BP Products North America	25NFA889	Discretionary	Ongoing
Lake	ABB, Inc.	29801 Euclid Ave., Wickliffe	ABB Inc.	25NFA890	Random	Ongoing
Hamilton	U.S. Playing Card Co.	4590 Beech St., Norwood	PLK Communities & Aces at Factory 52	25NFA892	Random	Ongoing
Hamilton	Lunkenheimer Property	1515 Tremont St., Cincinnati	Hamilton Co. Land Reutilization Corp.	25NFA893	Discretionary	Ongoing
Franklin	Vertiv Property	1030–1050 Dearborn Dr. & 7455 Reliance St., Columbus	1050 Dearborn LLC & II/III, LLC	25NFA903	Discretionary	Ongoing

FINANCIAL SUMMARY CY 2025

Executive Highlights

- **Total VAP Program Cost:** \$6,584,611
- **Total VAP Administration Fund Revenue:** \$1,179,201 (led primarily by Technical Assistance Cost Recovery)

VAP Expenditures

Expense Category	Fund 4R9 (VAP Fund)	HW Management Fund (505)	Environmental Protection Fund (5BC)	U.S. EPA Grants (Federal)	Total Cost
Personnel	\$990,387	\$1,633,772	\$1,217,106	\$583,098	\$4,424,362
Maintenance	\$194,863	\$247,131	\$22,010	\$4,448	\$468,452
Equipment	\$0	\$1,670	\$0	\$0	\$1,670
Contractual & Other	\$26,381	\$420,850	\$49	\$1,242,845	\$1,690,126
TOTALS	\$1,211,631	\$2,303,423	\$1,239,165	\$1,830,391	\$6,584,611

VAP Revenues

Revenue Source	CY 2025 Amount	% of Revenue
Technical Assistance Cost Recovery	\$685,876	58.16%
No Further Action Fees	\$293,125	24.86%
Certified Professional Fees	\$200,200	16.98%
Miscellaneous (intra-governmental, photocopying, etc.)	\$0	0.0%
CP Training Reimbursements	\$0	0.0%
AGO Collected	\$0	0.0%
Total VAP Administration Fund Revenue	\$1,179,201	100.0%



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Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049
614.644.3020
epa.ohio.gov

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