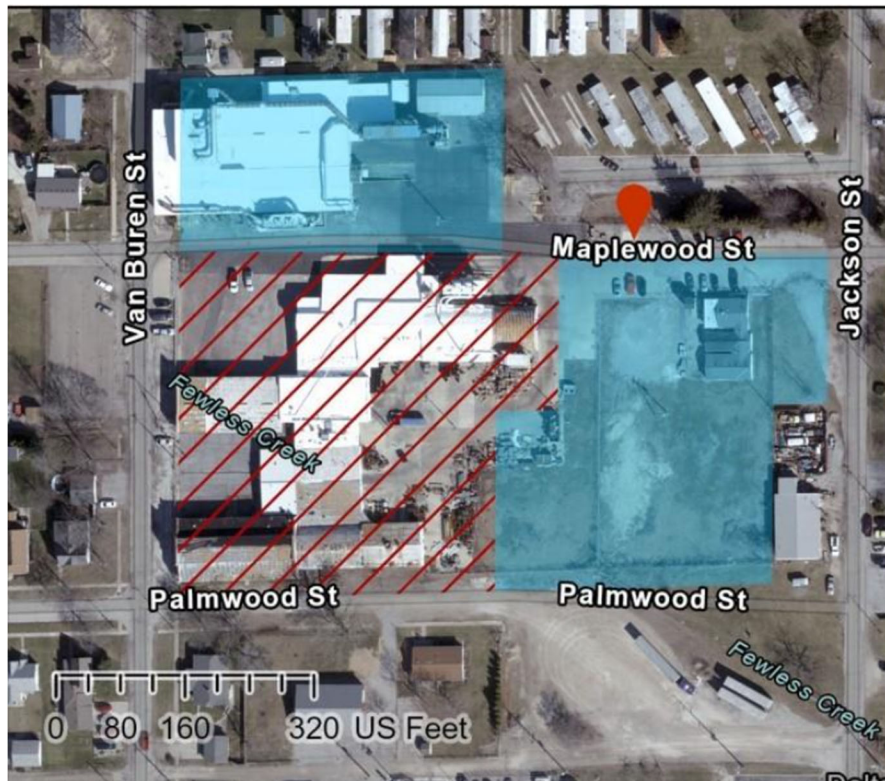


COMMUNITY SAMPLING AND ANALYSIS PLAN

Bunting Bearings and Fulton County Land Reutilization Corporation
200 Van Buren Street
Delta, Ohio 43515



Prepared by:



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Tetra Tech Project # 103S828803

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ACRONYM LIST

AOC	Area of Concern
AST	Aboveground storage tank
bgs	Below ground surface
BUSTR	Bureau of Underground Storage Tank Regulations
DDFO	Director's Final Findings and Orders
ft ² .	Square feet of foot
EE/CA	Engineering Evaluation/Cost Analysis
FCLRC	Fulton County Land Reutilization Corporation
HHRA	Human Health Risk Assessment
HUD	U.S. Department of Housing and Urban Development
IDW	Investigation-derived waste
µg/dL	Micrograms per deciliter.
µg/m ³	Micrograms per cubic meter
µg/ft ²	Micrograms per square foot
mg/kg	Milligrams per kilogram
NAAQS	National Ambient Air Quality Standard
NIOSH	National Institute of Occupational Safety and Health
NLLAP	National Lead Laboratory Accreditation Program
OAC	Ohio Administrative Code
ODH	Ohio Department of Health
Ohio EPA	Ohio Environmental Protection Agency
OUPS	Ohio Utilities Protection Service
ppm	Parts per million
PRG	Preliminary Remediation Goal
PRSCP	Post Removal Site Control Plan
RAP	Remedial Action Plan
RAR	Remedial Action Report
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RML	Removal Management Level
RSL	Regional Screening Level
SAP	Sampling and Analysis Plan
SOP	Standard Operating Procedures
Tetra Tech	Tetra Tech, Inc.
U.S. EPA	United States Environmental Protection Agency
XRF	X-ray fluorescence

1.0 INTRODUCTION

Tetra Tech, Inc. (Tetra Tech) was tasked by the Fulton County Land Reutilization Corporation (FCLRC) to prepare this Community Sampling and Analysis Plan (SAP) for the former Bunting Bearings/Eagle Picher facility (Subject Property) at 200 Van Buren Street and surrounding residential area in Delta, Fulton County, Ohio 43515, herein referred to as the Subject Property (shown on **Figure 1**). This SAP is developed pursuant to the Ohio Environmental Protection Agency (Ohio EPA) Director's Final Findings and Orders (DFFO) issued January 8, 2026. The Subject Property consists of 11 parcels totaling 4.42 acres of land.

Bunting Bearings currently operates on the Subject Property within Building 3 that is located on the north side of Maplewood Street; Buildings 1 and 2 on the south side of the road were demolished in November and December 2025. During demolition, a significant quantity of dust was released, resulting in elevated lead results in a nearby Ohio EPA air monitoring station. These elevated concentrations resulted in exceedances in the three month rolling average for lead concentrations in air per the National Ambient Air Quality Standard (NAAQS).

The purpose of this Community SAP is to determine if the dust release that occurred in late 2025 resulted in adverse impacts to the community surrounding the Bunting Bearings facility. This will be accomplished through the collection of surface soils and dust that may have settled in nearby residential and target areas.

This Community SAP provides an overview of planned activities to characterize the nearby community. **Section 1.0** contains background information for the Subject Property and past investigations, and project objectives; **Section 2.0** describes the investigative methodology; **Section 3.0** presents the analytical requirements; **Section 4.0** describes the anticipated investigation schedule; and references cited in the text are listed in **Section 5.0**. **Figures 1, 2, and 3** follow the text and **Attachment 1** includes an example of field sheets to be used.

1.1 SUBJECT PROPERTY BACKGROUND

Historic Sanborn Maps indicate that, in 1910, the Buckeye Gas Engine Company was located on the southwest corner of the Subject Property. In 1925, the building was labeled as the Air Scale Company machine shop, and to the north the Markey Belprez Manufacturing Company (Markey) was present. Markey manufactured bushings, brass, and aluminum castings. Markey sold the Subject Property to Eagle-Picher Industries in 1989, who sold it to Bunting Bearings a month later. The Subject Property has been operating as Bunting Bearings since 1989. Both Eagle-Picher and Bunting Bearings utilized the Subject Property for manufacturing bronze bar and bearings by melting brass, bronze scrap, and lead ingot.

The Subject Property has an extensive investigation and remedial history. As a follow-up on citizen complaints concerning poor air quality due to excessive emissions from the Eagle-Picher facility, the

Ohio EPA investigated the Subject Property in 1985 and collected 56 surface soil samples from 28 locations along the outside perimeter of the facility and in adjacent residential areas. Sample analysis revealed lead to be present in off-property surface soils at levels as high as 2,024 parts per million (ppm) (Ohio EPA 1995). The highest levels of lead were detected in areas closest to the property fence line.

The elevated lead levels detected on residential surface soil adjacent to the Subject Property raised concerns regarding the potential for lead poisoning of area residents, especially small children. As a result of these concerns, the Fulton County Health Department and the Division of Epidemiology within the Ohio Department of Health (ODH) conducted blood-lead screenings of area children in April and December of 1986. The screenings focused on children six months to six years of age. Twenty-eight children were screened in April, but only six returned to be retested in December. ODH concluded that while "clearly the potential for lead exposure exists in the study area, ... no significant exposure has occurred and there is no evidence of lead toxicity in the children who participated in the screening clinics." (ODH 1987).

Ohio EPA initiated air monitoring at the Subject Property in 1985. With Bunting Bearing Corporation's purchase of the property in 1989, the air emissions control systems at the facility were upgraded with five baghouse filter units collecting particulate matter from all manufacturing processes at the Delta, Ohio plant. In 2008, the U.S. Environmental Protection Agency (U.S. EPA) lowered the NAAQS for lead. As a result, based on air monitoring data collected at that time, the area around the Bunting Bearings' facility was determined to not meet the NAAQS and was designated as a nonattainment area effective December 31, 2010. Air monitoring data from June of 2006 to January of 2009 and then again briefly in 2011 showed violations of the NAAQS occurred consistently during that time period resulting in Ohio EPA investigating the cause of the violations and preparing a plan to bring the area into attainment. Ohio EPA identified housekeeping and maintenance issues as the cause and the plan required Bunting Bearings to implement procedures to eliminate those issues and the violations. Since that time, the air monitors have not shown violations of the standard until recent demolition activities.

Ohio EPA performed an integrated assessment of the Subject Property in June 6-7, 1995, by sampling groundwater from wells within a one-mile radius of the property, by collecting sediment and surface water samples from Fewless Creek, and by collecting 12 surface soil samples from the perimeter of the property. Results of this sampling indicated the presence of elevated levels of heavy metals in on-property and off-property soils and in sediments from Fewless Creek. Lead was detected in off-property residential surface soils at levels up to 15,600 ppm, nearly 700 times higher than typical background levels for lead in northwestern Ohio. Elevated lead levels were detected in on-property sediment samples collected from Fewless Creek (up to 360 ppm lead).

Eagle-Picher and the Bunting Bearings Corporation signed an Administrative Order by Consent with the U.S. EPA in March 1998. The companies, through their contractor (ENSR 1999), conducted an environmental investigation of the Subject Property and surrounding residential and commercial

areas during June-August 1998 as part of the Engineering Evaluation/Cost Analysis (EE/CA) investigation of the Subject Property. Initial on-property soil samples had concentrations of lead in soils up to 5,590 ppm and lead in spent foundry sand ranging from 3,440 - 5,080 ppm (ENSR 1999). This investigation also included off-property soil sampling to assess the extent of heavy metals contamination in adjacent residential and commercial properties. Lead, copper, and zinc concentrations were initially screened using x-ray fluorescence (XRF) technology. Soil samples were taken at a total of 146 sampling locations around the periphery of the Subject Property (ENSR 1998). The companies and U.S. EPA established a Preliminary Remediation Goal (PRG) of 400 ppm for residential surface soils (ENSR 1998). Lead levels in the soils were detected across the sampling area above the screening level of 400 ppm with levels up to 8,209 ppm. Due to the high levels of lead present in the soils, blood lead screenings were once again given to area children in 1998. All blood lead levels were below the screening level of 10 micrograms per deciliter ($\mu\text{g}/\text{dL}$). U.S. EPA conducted a removal action of contaminated soils in the residential properties adjacent to the Subject Property to mitigate the possibility of any future exposures to lead contaminated soil.

Civil & Environmental Consultants, Inc. (CEC) conducted a Phase I Property Assessment (PA) and a Phase II on the Subject Property in May and December, 2022 for the Fulton County Commissioner's Office. In August 2024, HazCorp. completed an asbestos inspection of the Subject Property buildings for Bunting Bearings, LLC.

CEC performed the Phase I in May 2022 of 11 parcels of land totaling 4.42 acres, and approximately 70,000 square feet of buildings space. CEC stated that activity and use limitations (AULs) were in place at the Subject Property. The Environmental Covenant (EC) restricts the use of the Subject Property from residential use without consent of U.S. EPA, prohibits the extraction and use of groundwater, includes maintenance of pavement and concrete floors, and restricts soil disturbance in Deed Restricted Areas (as defined in the Post Removal Site Control Plan [PRSCP]). CEC also reviewed two previous reports – the PRSCP and a Remedial Action Report (RAR). These reports are summarized below.

A RAR, addressed to the U.S. EPA and dated January 9, 2009, describes the sampling efforts and remedial action completed at the Subject Property from 1999 through 2008. The RAR notes initial investigations at the Subject Property began in 1985 with Ohio EPA collecting soil samples at targeted locations across the property for lead in soil analysis. The investigations continued with both State and Federally-led activities that culminated in the Administrative Order by Consent among the U.S. EPA, Eagle-Picher Inc., and Bunting Bearings Corporation. Soil removal action objectives were initially established at 400 milligrams per kilogram (mg/kg) lead (residential use standard) for general property soil and 200 mg/kg lead (ecological standard) for soil along the bank of Fewless Creek. In 2004, the soil removal action for general property soil was increased from 400 mg/kg to 1,536 mg/kg (industrial use standard) and an agreement was reached that would include establishment of the EC restricting property use to commercial/industrial uses and establishing certain engineering controls to be relied upon and verified as part of an annual Operation and Maintenance Plan (described in greater detail within the PRSCP narrative).

The remedial action consisted of the removal of soil from various areas of the Subject Property, soil consolidation and amendment within controlled stockpiles at the south portion of the Subject Property, stockpile sampling for disposal considerations, and transportation and disposal of soil. In addition, a 78-inch corrugated metal pipe culvert was installed in Fewless Creek from Jackson Street to the west to adjoin with an existing culvert. The Remedial Action Plan (RAP) consisted of the following nine phases of work strategized to allow Bunting Bearings to continue manufacturing operations on the Subject Property.

- Phase 1. This phase was initiated in June 2002 and included removal of soil from the north wall of the Plant #3 loading dock at depths ranging from 2 to 6 feet. Five verification samples were collected (VNP3-01 through -05) and soil was disposed of as solid waste at Carlton Farms.
- Phase 2. This phase was initiated in the Summer of 2002 and consisted of facility preparation activities in Buildings A-1 through A-5 and the demolition of Building A-1. No soil remediation activities took place during Phase 2.
- Phase 3. Phase 3 was initiated in July 2002 and included the removal of the concrete slab in Buildings A-2 through A-5 and the removal of underlying lead-impacted soil. At Building A-5, approximately 300 tons of soil were removed to approximately 4.2 feet. Two verification samples showed high concentrations of lead in soil, and additional remedial efforts were completed to a depth of approximately 5 feet. Soil was disposed of at Carlton Farms. At Building A-4, approximately 740 tons of soil was removed to 4 feet; verification samples confirmed remediation goals were met and soil was transported to Carlton Farms. At Building A-3, approximately 620 tons of soil were removed to 4.2 feet; soil was disposed of at Carlton Farms. At Building A-2, approximately 240 tons of soil was removed to 3.5 feet and disposed of at Carlton Farms. Building A-1 was demolished in July 2022; this building was located within a Deed Restricted Area.
- Phase 4. This phase was initiated in January 2003 and included the demolition of Buildings B-24, B-16, B-17, B-18, B-19, B-20, and "E" Baghouse.
- Phase 5. Phase 5 of the RAP was initiated in February of 2003 and included the remediation of soil underlying Buildings B-8, B-9, and B-11 through B-13. At Building B-8, approximately 465 tons of soil was removed to 2.5 feet. Soil was disposed of at Adrian Landfill. At Building B-9, approximately 465 tons of soil was removed to 3.5 feet. Soil was disposed of at Adrian Landfill. At Buildings B-11 through B-13, approximately 940 tons of soil was removed to 3 feet. Soil was disposed of at Adrian Landfill. Buildings B-14, B-15, B-21 and "C" Baghouse are located within a Deed Restricted Area.
- Phase 6. Included the collection of additional soil and sediment samples along Fewless Creek. During the implementation of Phase 6, a shift in the remediation goals was decided. The previous goal of 400 mg/kg lead (to meet the residential standard) was increased to 1,536 mg/kg lead (to meet the industrial standard), combined with the reliance of deed restrictions and monitoring/reporting. Due to this change, no soil was removed under Building B-26, the west employee parking area (with the exception of a small area in the southeast corner), and a reduction of volume in the North Yard (Maplewood Street area).
- Phase 7. Phase 7 of the RAP was initiated in February of 2004 and included the remediation of soil underlying the north portion of the South Yard (former Buildings B-16 through B-20)

and the relocation of an underground high-voltage power line. In the north portion of the South Yard, approximately 1,450 tons of soil was removed to 4 feet. In the North Yard, approximately 1,200 tons of soil was removed to 4 feet. In the east portion of the South Yard, approximately 800 tons of soil was removed to 4 feet. Building B-25 was demolished on April 6, 2004 and approximately 1,400 tons of soil was removed to 2 feet. At the Building B-11 dock area, approximately 260 tons of soil was removed from 2 to 8 feet. At the Building C-8 and C-9 area, approximately 200 tons of soil was removed from 1 to 2 feet. Soil was disposed of at Adrian Landfill.

- Phase 8. Phase 8 of the RAP was initiated in June of 2004 and included the relocation of equipment in Buildings B-1 through B-7, B1A, B-1D, and B-1E, the removal of soil from the New West Storage Area and the removal of soil from the south portion of the South Yard. Work in the area of the New West Storage Area included the removal of approximately 2,200 tons of soil from 2 to 3 feet. Work in the south portion of the South Yard included the removal of approximately 260 tons of soil from 3 to 7 feet. In addition, a concrete vault containing oily water was identified in the South Yard, east of Building A-3. Approximately 600 gallons of oily water was removed and disposed of off-property, followed by the removal of the concrete vault. Additional areas of soil removal were completed along Fewless Creek during Phase 8 of the RAP to address lead concentrations in samples. Approximately 220 tons of soil was removed and disposed of at Adrian Landfill. Sediment was also removed from within the culvert of Fewless Creek via a vac truck. Sediment removed from Fewless Creek was mixed with stockpiled soil and disposed of at Adrian Landfill. Also completed during Phase 8 was the removal of an underground storage tank (UST) located under Building B-7. A 1,000-gallon UST was removed, along with approximately 15 cubic yards of visually impacted soil. The UST was closed in accordance with Bureau of Underground Storage Tank Regulations (BUSTR) guidance and a No Further Action (NFA) status has been issued by BUSTR for the UST removal.
- Phase 9. Phase 9 of the RAP included the collection of additional analytical data for soil in the area of Building A-3 where chlorinated volatile organic compounds (VOCs) were detected in soil near the concrete vault that is discussed in Phase 8. Twenty-three soil borings were installed in July 2004 to identify the source area for the chlorinated VOCs. Based on the evaluation of the analytical data, an impacted area approximately 40 feet wide, 115 feet long, and up to 12 feet deep was approximated underlying Buildings A-2, A-3, A-4, and A-5. Initial plans to excavate soils in this area were delayed when Eagle-Picher filed for bankruptcy. A determination was made by Bunting Bearings to leave the impacted soil in place, complete a Human Health Risk Assessment (HHRA), and to monitor the indoor air overlying the impacted soils.

2.0 SAMPLE METHODOLOGY

The wipe and soil sampling methodologies and references for this project are based on the U.S. Department of Housing and Urban Development (HUD) Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (HUD 2012). Tetra Tech understands the project may be completed in multiple phases, depending on initial sample results for properties identified within Ohio EPA's Area of Concern (AOC) for November and December 2025. The AOC contour lines for November and December 2025 were developed using air modeling and worse case assumption to define an area that had potential to have lead in air concentrations of 0.15 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) (see **Figure 2**). Within these November and December 2025 AOC areas there are approximately 39 single family residential homes and two mobile home areas encompassing about 30 mobile homes. These homes and trailers within the AOC for both months are shown on **Figure 3**.

Prior to implementation of field activities, Tetra Tech will coordinate property access directly with each individual property owner. Coordination will occur in accordance with the Community Involvement Plan including ongoing community meetings and interviews, online and physical questionnaires, including surveying ages of residents and children visiting the property for more than six hours per week, and access agreements. Tetra Tech has also compiled a list in a spreadsheet of the residential addresses within the AOC areas and nearby Delta and Pike-Delta school campuses/play areas and will be mailing access agreements proposing to complete wipe and soil sampling in April 2026. Ideally, access will be provided to all parcels and follow up will likely be required through either in person visits to individual residences or phone calls. The signed property access agreements will be tracked on a spreadsheet for residents located within the AOC areas. Ohio EPA, ODH and Fulton County Health Department will be notified five (5) days prior to the start of the sampling.

Tetra Tech will contact the Ohio Utilities Protection Service (OUPS) to mark public underground utilities for each property a minimum of 48 hours and maximum of 10 days before performing intrusive sampling activities.

The methodology for soil and wipe sampling is presented below. All sampling activities will be completed by one of Tetra Tech's ODH-licensed Lead Risk Assessors in accordance with Ohio Administrative Code (OAC) Rule 3701-32-01(YY).

2.1 SOIL SAMPLE COLLECTION

Surface soil samples will be collected by an ODH-licensed Lead Risk Assessor, at properties where access is granted, to determine whether the soil outside of a dwelling poses a significant hazard to children or inhabitants of the dwelling. Bare soil areas to be sampled include children play areas (if present) and non-play areas in the rest of the yard. Soil samples will not be collected from the dripline/foundation area of dwellings. HUD defines the dripline as "The area within 3 feet out from the building wall and surrounding the perimeter of a building".

Tetra Tech expects to interview property owners during the ongoing in-person interviews, online or physical questionnaires, or in person or over the phone following receipt of signed access agreements to determine if children under the age of six live at or visit the properties and attempt to determine the frequency of use of play areas. This information will be documented on the field sheets provided **Attachment 1**.

A composite sample will be collected from play areas or bare soil at the properties. Each composite sample will be comprised of 3 to 10 individual discrete samples (aliquots) collected from a depth of 5/8th inch that will be composited in the field. Each subsample will be collected at least 2 feet away from each other if possible (small play areas may not be large enough for this spacing). The shallow depth is prescribed by HUD and is meant to be representative of recent lead dust deposition. Non-play area bare soil should ideally be greater than 9 square feet. Care will be taken to avoid the driplines around structures built before 1978 as lead-based paint may be present. A sketch of the property and sampled areas will be provided on the field sheets in **Attachment 1**.

In addition to residential properties within the AOC areas, soil samples will also be collected from bare soil in nearby areas where children are present. These areas include the playground at the Delta Municipal Park, near the play area at the Delta Elementary School, and at athletic fields (baseball / softball fields, football field) associated with the Pike-Delta York Middle and High Schools.

According to the DFFO, soil sample results will be compared to state and/or federal standards for the media sampled. The OAC Rule 3701-32-19 stipulates:

- (D) Lead-contaminated soil is hazardous to human health when present:
- (1) In non-play areas when the lead concentration from a composite sample, or arithmetic mean of composite samples, is equal to or exceeds one thousand two hundred micrograms per gram (1,200 ppm or mg/kg);
 - (2) In play areas when the lead concentration from a composite sample is equal to or exceeds four hundred micrograms per gram (400 ppm or mg/kg).

2.2 WIPE SAMPLE COLLECTION

The ODH-licensed Lead Risk Assessor will perform outdoor dust wipe sampling at locations within the AOC areas as well as areas with sensitive receptors (such as children under the age of 6). The number of samples collected will depend on access obtained from residential property owners and suitable locations on properties where access is granted. These areas may include nearby parks, schools or daycare centers (including those schools and parks discussed above). **Figure 3** identifies schools and parks north of the AOC areas where samples may be collected. The Lead Risk Assessor will designate locations where wipe sampling will occur based on conditions observed in the field. Locations may include benches, tables, exterior window sills, playground equipment such as slides or swings, or patio floors.

In addition to the wipe samples collected at receptor locations, wipe samples will also be collected from the surface of debris removed from the Subject Property during demolition to determine if the material is contaminated with lead dust. Approximately 50,000 square feet of concrete surface area was removed from the property so an estimated five wipe samples will be collected; however, the number of samples may be adjusted in the field at the discretion of Tetra Tech's Lead Risk Assessor. The Lead Risk Assessor will measure the approximate size and dimension of the debris and record where the dust wipe samples are to be collected.

Wipe sampling results will be compared to current residential standards as listed in HUD Office of Lead Hazard Control and Healthy Homes Policy Guidance Number 2017-01 and OAC Rule 3701-32-19. Residential lead contaminated dust hazard levels are ≥ 10 micrograms of lead per square foot ($\mu\text{g}/\text{ft}^2$) for interior floors; ≥ 10 $\mu\text{g}/\text{ft}^2$ of lead for exterior horizontal surfaces; ≥ 40 $\mu\text{g}/\text{ft}^2$ of lead for porch floors, ≥ 100 $\mu\text{g}/\text{ft}^2$ of lead for interior window sills and ≥ 100 $\mu\text{g}/\text{ft}^2$ of lead for window troughs.

If wipe samples from the surface concrete debris contain elevated concentrations of lead, then additional sampling of the concrete may be warranted to determine how the material can be properly disposed.

2.3 SAMPLING PROCEDURES

Sample collection, handling, and field activities will all be performed according to the current HUD methodology.

All soil samples will be collected from the 5/8th -inch depth interval outside of building driplines and away from influences of any painted surfaces.

- A minimum eight (8) ounces of soil will be collected for each composite sample using stainless steel shovels, probes, and/or spoons.
- Each sample container (zip lock bag) will be labeled with the prescribed sample nomenclature and logged using pre-printed log sheets (**Attachment 1**).
- Each sample location will be geolocated using GPS technology with a minimum accuracy of one foot.
- A chain of custody will be completed using laboratory provided forms. A PDF shall be created of the completed, signed COCs and the field log sheets and saved in the project folder.
- The samples will be shipped to a contracted U.S. EPA NLLAP-accredited laboratory (to be selected).

Due to the nature of this project and the six-month hold time, the samples will be packaged and shipped to the laboratory at least weekly.

2.4 SAMPLE NOMENCLATURE

The sample numbers will start with a county abbreviation followed by a pre-assigned parcel number. The county abbreviation will be "F" for Fulton County.

Example: F301

For the composite soil samples, a designation of "CS" will then be followed by a sequential number for the particular property (1, 2, 3, etc.).

Example: F301-CS1

If the composited soil sample is from a play area, a designation of "PA" will follow.

Example: F301-CS1-PA

For the wipe samples, a designation of "W" will then be followed by a sequential number for the particular property (1, 2, 3, etc.).

Example: F301-W1

3.0 ANALYTICAL REQUIREMENTS

Soil and wipe samples will be submitted for analysis using ODH-approved methods by an ODH-accredited laboratory.

For soil samples:

1. Soil will be processed for total lead analysis using a validated modified version of U.S. EPA Method 3050B, and analyzed using U.S EPA Method 7000B.
2. Replicate: one composite per every 20 composite samples will be collected for analysis.
3. Soil sample hold time is 6 months.

Wipe sample analysis will be processed using a modified version of the National Institute of Occupational Safety and Health (NIOSH) Method 7082 and analysis by U.S. EPA Method 7000B for total lead.

4.0 SCHEDULE

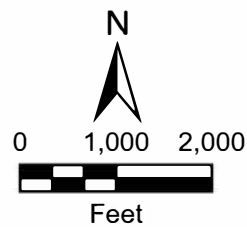
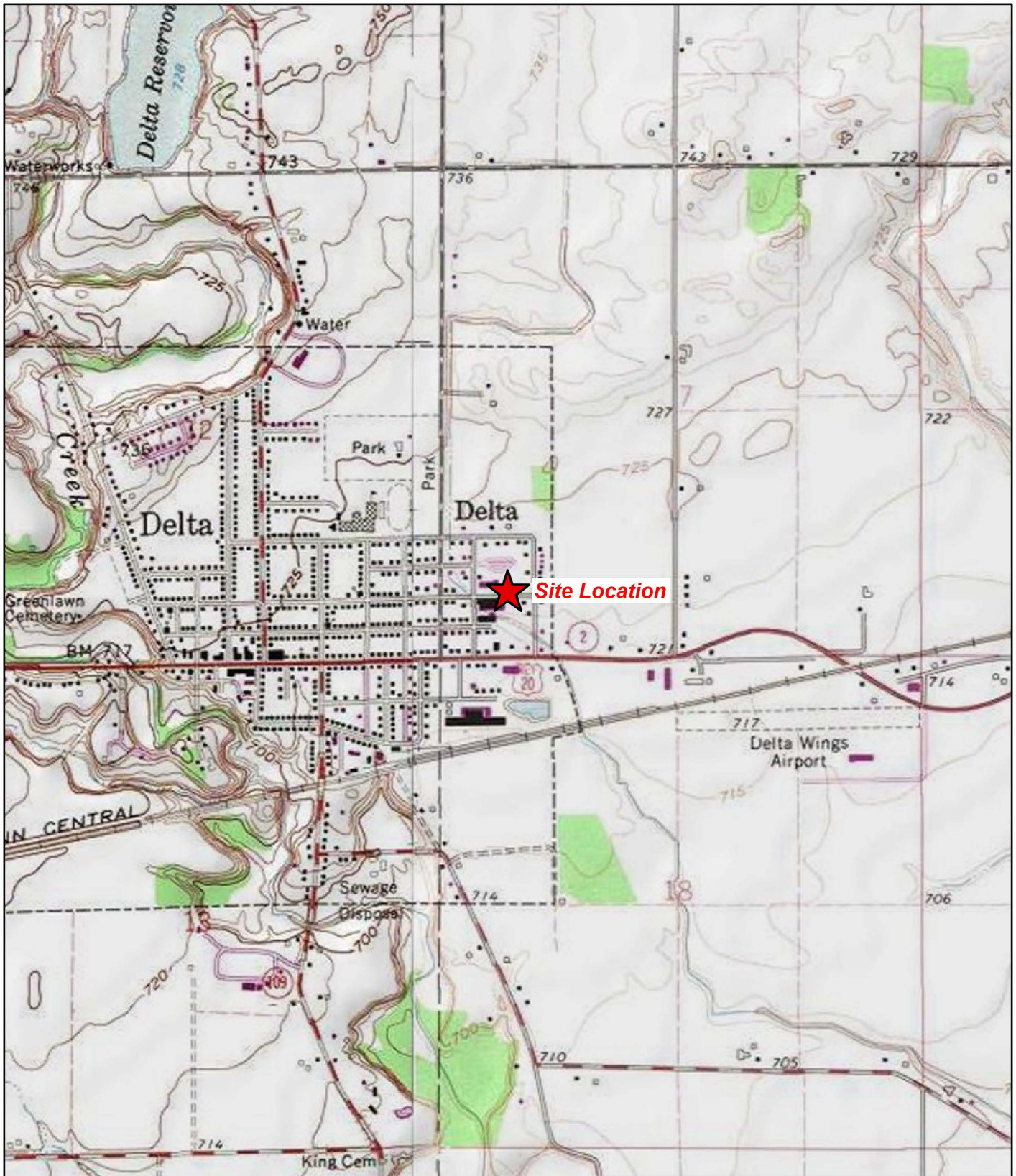
Tetra Tech anticipates initiating project activities immediately upon Ohio EPA approval and beginning field work as soon as mid-April 2026. Tetra Tech anticipates that sampling can be completed within 10 field days, pending property access and weather conditions. Tetra Tech will request a 14 day turn-around time for samples submitted to the laboratory. Based on the initial round of sampling results, Tetra Tech will work with the State to determine if assessment is complete or additional assessment is required. The decision for further assessment will be determined by the analytical results from the first round of sampling.

Further actions surrounding the Bunting Bearings facility are dependent on the finding of the initial investigation. If no wipe or soil samples exceed reportable levels for lead, then a report of findings will be prepared and no additional work may be warranted. If lead exceeds reportable levels in wipe or soil samples within the AOC areas, then depending on the distribution, expansion of the AOC and further characterization may be warranted. For properties where lead exceeds reportable levels in soil or wipe samples and the likely source of contamination is related to the dust release, then interim controls, cleaning, or abatement measures will be explored in accordance with Chapters 11 through 14 of the HUD guidance (HUD 2012).

5.0 REFERENCES

- ENSR. 1998. Data Report for EFJCA Support Sampling Program at the Former Eagle-Picher Site. Delta, Ohio. October, 1998.
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- Ohio Environmental Protection Agency (Ohio EPA). 1995. Integrated Assessment Report for Eagle-Picher (a.k.a. Markey Bronze). Delta, Fulton, County. September 22, 1995.
- U.S. Department of Housing and Urban Development. 2012. Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. Second Edition. July.
- Weston. 2001. Site Assessment Report for the Eagle-Picher Residential Properties Site. Delta, Fulton County, Ohio. June 20, 2001.

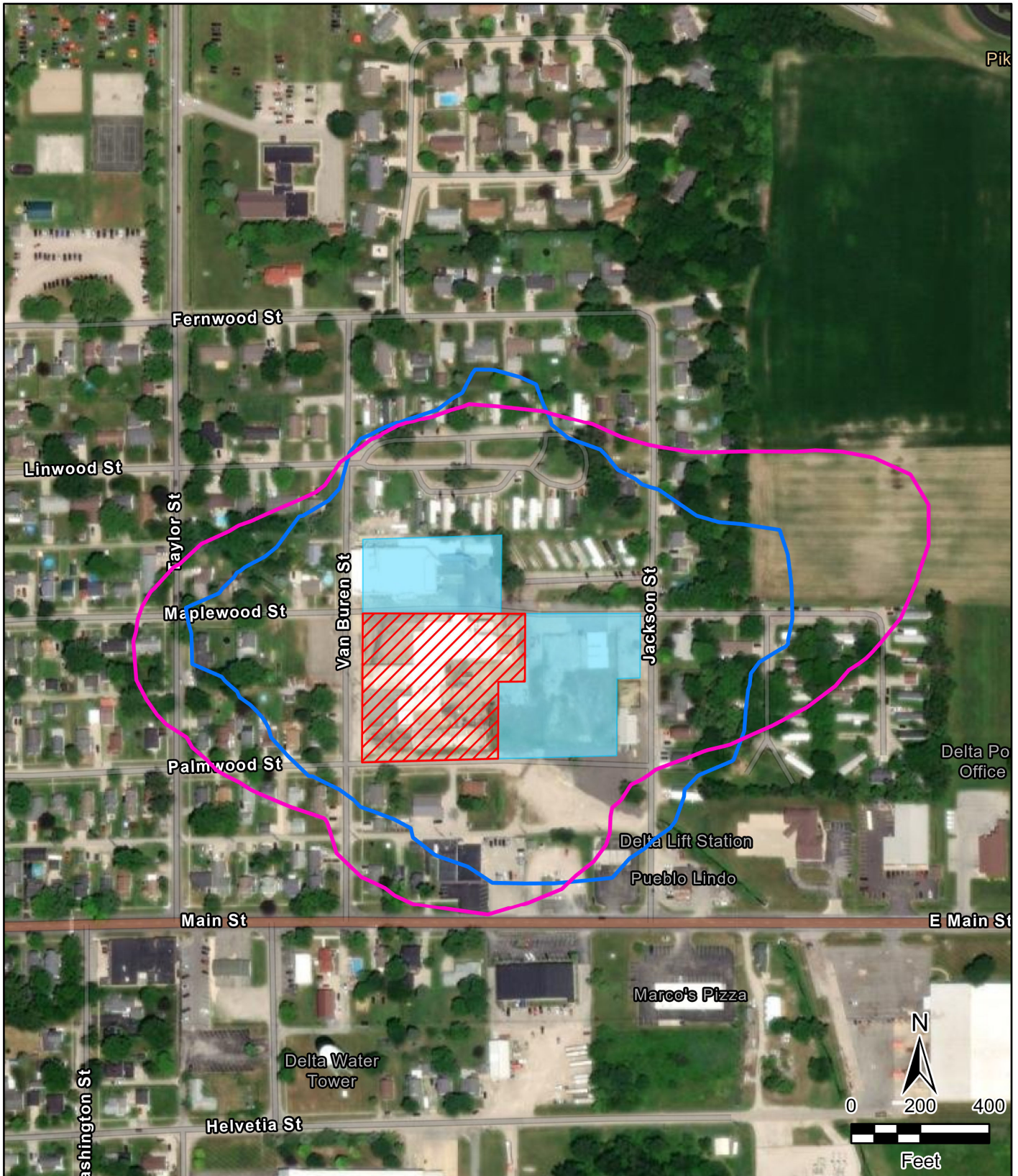
FIGURES



Bunting Bearings, LLC 200 Van Buren
Street Delta, Ohio 43515

Figure 1
Site Location Map





Legend

- December 2025 Contour
- November 2025 Contour
- Demolition Area
- Remaining Facility

Notes:

- Monthly Average Pb Concentration of 0.15 $\mu\text{g}/\text{m}^3$ at Max Emission Rate of 0.03833 lb/hr
- $\mu\text{g}/\text{m}^3$ Micrograms per cubic meter
- lb/hr Pound per hour

Bunting Bearings, LLC
 200 Van Buren Street
 Delta, Ohio 43515

Figure 2
 Site Layout and Lead Contours

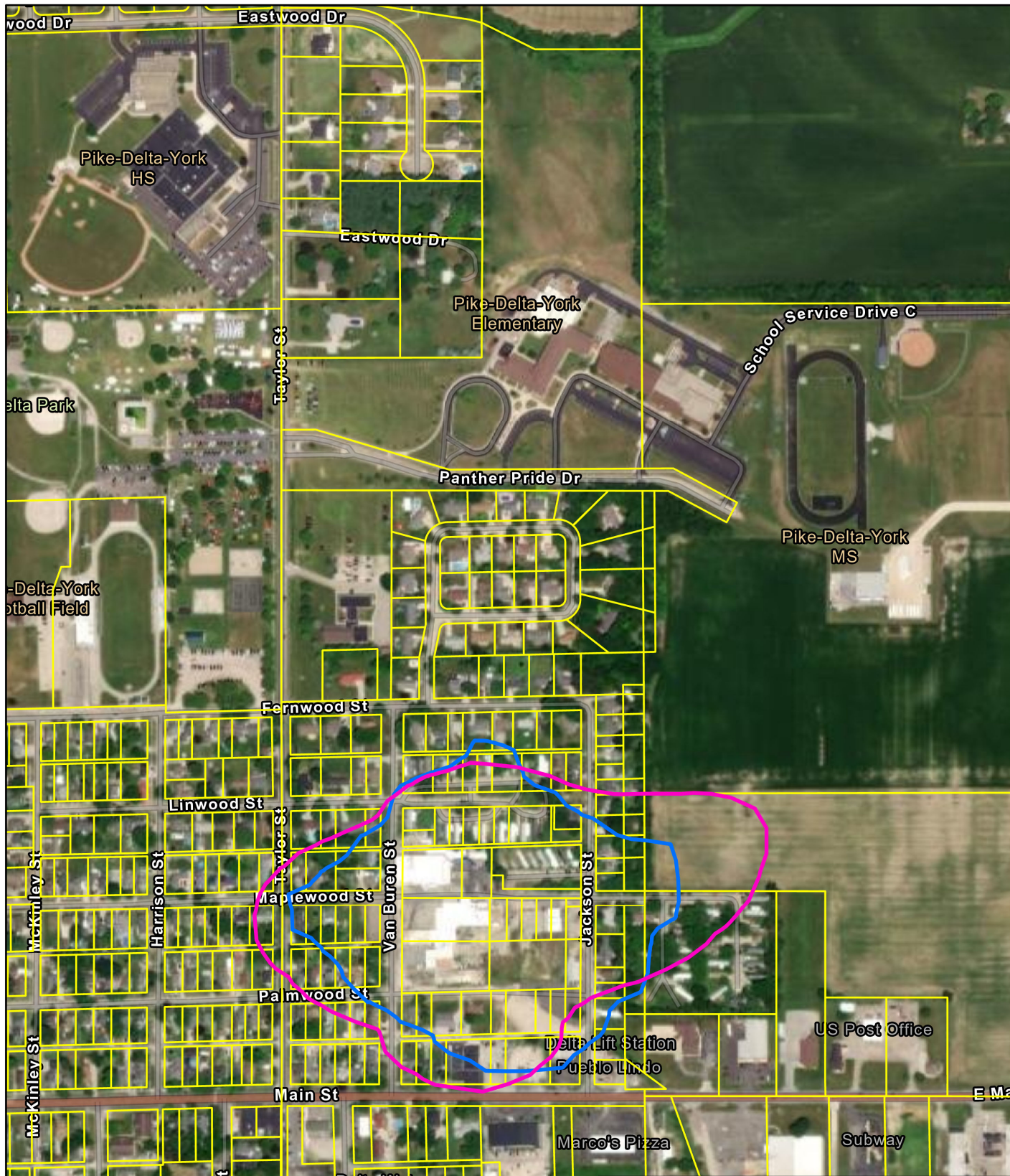


Date: 2/5/2026

Drawn By: Susmita Shrestha

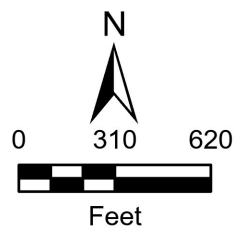
Project No: 103Z828803

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Legend

- December 2025 Contour
- November 2025 Contour
- Parcels



Bunting Bearings, LLC
 200 Van Buren Street
 Delta, Ohio 43515

Figure 3
 Site Parcel Map



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ATTACHMENT 1

Delta Residential Soil Assessment Project

Date/Time: _____ Property Identifier: _____

Property Owner: _____ Renter name (if applicable): _____

Address: _____ Phone # _____

Property Size/Category: _____ Sampler Name(s): _____ Logger Name: _____

Property Sketch/Sample Locations

Sample Collection Information

List sample number(s) with date & time:

Continued on other side

Delta Residential Soil Assessment Project

Field Notes:

Property#

Sampling Specifics:

1. A minimum of 8 oz of soil will be collected for EACH sample.
2. All samples will be collected from outside of the drip zone and away from influences of any other painted surfaces.
3. All samples will be collected from a depth of 5/8".
4. Composite samples will be composited in the field.
5. Equally space the composite samples aliquots (2 feet apart) within the respective portion of the bare soil area.

Sample Nomenclature

Composite samples: (Property #) - (CS+ composite #) - (Play Area) *Example: F301-CS1-PA*

Wipe samples: (Property #) - (W + wipe #) *Example: F301-W1*