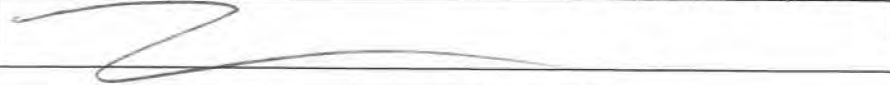


Notice of Intent (NOI) for a Beneficial Use General Permit or Amended NOI Form

Submission of this NOI constitutes notice that the Applicant identified in Section 3 of this form is eligible to obtain coverage under Ohio EPA's beneficial use general permit program. Becoming a permittee obligates the Applicant to comply with the terms and conditions of the general permit. Complete all required information as indicated by the instructions.¹ **A check for \$200 must accompany this form and be made payable to "Treasurer, State of Ohio".**

1. General Permit Number: BUGPFS01			
2. Applicant's Information:			
Name: Kurtz Bros., Inc., RKDF, Inc., and KBCO, LLC.			
Mailing Address: 6415 Granger Road			
City:	Independence	State:	Ohio Zip: 44131
Contact Name:	Jason Ziss	Title:	
Phone:	(216) 986-7000	Fax:	() - E-mail: jasonz@kurtz-bros.com
3. ²Generator's Information:			
Name: See attached list			
Mailing Address:			
City:		State:	Zip:
Contact Name:		Title:	
Phone:	() -	Fax:	() - E-mail:
Optional: Second Generator's Information:			
Name:			
Mailing Address:			
City:		State:	Zip:
Contact Name:		Title:	
Phone:	() -	Fax:	() - E-mail:
4. Beneficial Use Byproduct Storage/Management Location(s):			
Bridgeview Production Facility in Valleyview, OH		Avon Production Facility in Avon, OH	
RKDF Production Facility in Brooklyn Hts, OH		See attached list	
5. Is the sampling plan attached?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
6. Is the laboratory report and sampling analysis attached?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
7. Signature of the Applicant: (see Ohio Administrative Code 3745-599-25)			
By signing this document, I certify that all statements and all assertions of fact made in the document and attachments, to the best of my knowledge and belief are true and accurate, and comply fully with applicable beneficial use rules.			
Typed name:	JASON ZISS	Title:	BUSINESS DEVELOPMENT
Signature:			Date: 1/4/19
For Agency Use Only			
Date Received:	/ /	Application/Revenue ID:	Organization ID:
Document ID:		Place ID:	Check ID:
Check Date:	/ /	Check Number:	Check Amount:

¹ The \$200 fee also applies when submitting an Amended NOI Form when adding additional generators to a Permittee's General Permit.

² For multiple generators, attach additional pages to include each generator's information



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III. Beneficial Use - Applicant

Name: Kurtz Bros., Inc., and affiliated companies – RKDF, Inc., and
Kurtz Bros. Central Ohio, LLC. (KBI)
Address: 6415 Granger Road, Independence, Ohio 44131
Phone Number: (216) 986-7000
Contact: Jason Ziss jasonz@kurtz-bros.com

Beneficial Use – Application Preparer

Name: ENVi- Environmental
Address: 6415 Granger Road – Independence, Ohio 44131
Phone Number: (216) 986-7000
Contact: Bruce Bailey bruceb@envi-environmental.com
Cell: 330-224-0415

IV. Description of Generating Process

These foundries are either an iron or ferrous foundry producing various castings or an aluminum smelter producing various castings. Natural silica sand used in the foundry with a binder system as part of the casting process. Typically, the spent foundry sand is processed through an on-site reclaimer for the purpose to return the foundry molds and cores back to appropriate size for reuse. Typically, a foundry recycles 25% to 40% of the reclaimed sand for production. The foundry sands are off-tan to black to pinkish in color. The color is a result of the binder system and pouring process. KBI manages approximately 3,385 cubic yards of spent foundry sand per month.

V. Description of Proposed Beneficial Use

The spent foundry sand generated from the various iron and aluminum foundries is proposed for the following use:

➤ Topsoil Production

Approximately 41,000 cubic yards of spent foundry sand is estimated to be beneficially used on an annual basis. Soil blending will be marketed to commercial and residential outlets. Soil blending operations include the use, by volume, of approximately 30% spent sand and 70% natural soils. Soil blending occurs as KBI sites statewide.

VI. Sampling & Analysis Plan

i. Objective

The objective of this Sampling & Analysis Plan is to demonstrate acceptability for the beneficial use of foundry sand generated by KBI managed foundries. The analytical data collected in accordance with this SAP will be assembled as a component of a General Permit Application (BUGPFS01) for review and approval by Ohio EPA.



ii. Sample Locations

All samples will be collected from the reclaiming system as the foundry sand is conveyed, or emptied, into roll-off containers staged at a foundry. Typically, at each foundry, while the sand reclamation equipment is operating, five (5) grab samples will be collected at 3-minute intervals from the chute filling the roll-off container over an approximate 15-minute period.

KBI Managed Foundry	No. of Lab Samples	Sample Method	Type of Sample
Foundry Sand Reclaiming System	1	Grab – time intervals	Composite

iii. Sampling Equipment

Stainless steel trowel/stainless steel bowl/sample container/label; latex gloves; Chain of Custody form. Trowel and bowl will be decontaminated with Alconox and distilled water solution in advance of each sampling event.

iv. Sampling Procedures

With the sand reclamation system in operation, grab samples will be collected from the chute filling a roll-off container every 3-minutes over an approximate 15-minute period. The five (5) grab samples collected will be combined into a stainless-steel mixing bowl. A homogeneous, composite sample will then be containerized for laboratory analysis.

One (1) composite sample will be containerized in 32-ounce glass wide-mouth jars with plastic screw top lid with Teflon liner. Each sample will be marked with the date and time of sampling including a unique identification name on a label affixed to the glass sample jar. No preservatives are required for these samples.

The KB managed foundry sand will be sampled annually in accordance with OEPA DMWM General Permit BUGPFS01 and analyzed for beneficial use parameters. The KB managed foundry sand source will also be sampled and analyzed whenever a change in the foundry process is expected.

v. Laboratory Analysis

Method 6010 B “Total” analysis and Synthetic Precipitation Leaching Procedure (SPLP 1312) was conducted by Cardinal Laboratories. The analysis results are compared to the OEPA DMWM General Permit BUGPFS01 Table 1: Constituents Limits as listed below:

COCs	Laboratory Method	Container Type	Holding Time (days)
Metals	SW846 6010	32 oz. glass	180



Metals	SW846 1312	32 oz. glass	180
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Metal	OEPA Limit Total (mg/kg)
Aluminum	77,000
Antimony	31
Barium	15,000
Cadmium	39
Copper	1,500
Iron	55,000
Lead	300
Selenium	100
Zinc	2,800

Please see Appendix A for copies of the laboratory analysis.

vi. Sample Identification (Example)

Sample ID	Sample Location	Date	Generator	Method
05-01	Conveyor to Roll-Off Container	5/1/18	TSM	Total Metals 6010

vii. Annual Sampling and Reporting

On annual basis, the KB managed foundry will take a representative sample from the sand stream and characterize according to the appropriate General Permit standards. The KB managed foundry sand will be sampled annually in accordance with the procedures provided above. Analysis of annual sampling will be in accordance with OEPA DMWM General Permit BUGPFS01 beneficial use parameters.

An Annual report will be compiled and forwarded to the Ohio EPA by April 1st each year, detailing the following information for the previous calendar year:

- Volume of Foundry Sand beneficially used by the foundries for topsoil production.
- Volume of Foundry Sand stored for beneficial use by the foundries.
- Sampling details and laboratory analysis of foundry sand beneficially used.

VII. Recordkeeping

The following information will be retained for recordkeeping purposes for the period of five (5) years by KB:

- Name/Address/Contact information of the Generator: KB Managed Foundry



- Actual volume of foundry sand received and beneficially used by KB.
- Location of beneficial use of foundry sand.
- Sampling & Analysis Plan as well as details/dates of sampling and corresponding analysis reports.

VIII. Conclusion

ENVi-Environmental appreciates the opportunity to submit this application. Please contact our office for any additional information.



Appendix A Laboratory Analysis Summary

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KBI Foundry Sand 2016 Annual Testing Data Summary

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Metal	OEPA BUGPFS01 Limit Total (mg/kg)										
Aluminum	77,000	71.3	391	<100	3,950	169	681	290			
Antimony	31	<6.8	<8.2	<8.3	<8.3	<7.8	<8.4	<7.2			
Barium	15,000	14.3	2.93	<2.1	6.87	<1.9	11.2	2.35			
Cadmium	39	<0.85	<1	<1	<1	<0.97	<2.1	<0.90			
Copper	1,500	21.8	<10	11.5	64	10.3	<10	<9			
Iron	55,000	16,200	716	158	1,740	5,550	674	501			
Lead	300	<3.6	<4.1	<4.2	<4.2	<3.9	<4.2	<3.6			
Selenium	100	<8.5	<10	<10	<10	<9.7	<10	<9			
Zinc	2,800	33.3	11.9	<8.3	27	<7.8	<8.4	<7.2			

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Metal	OEPA BUGPPS01 Limit Total (mg/kg)	120	2,110	590	250	1,160	1,750	122	2,680	144	970	1,280	548	494	563				
Aluminum	77,000	<9.9	<9.6	<8.6	<6.8	<7.6	<7.6	<8.7	<7.1	<9.9	<7.8	<7.3	<8.9	<7.6	<7.7				
Antimony	31	<2.5	27.4	<2.1	1.95	4.84	2.81	2.42	11.2	<2.5	2.96	35.5	15.9	3.92	4.72				
Barium	15,000	<12	<12	<11	<0.85	<0.9	<0.95	<1.1	<0.89	<1.2	<0.94	<0.92	<1.1	<0.95	<0.96				
Cadmium	39	<12	<12	<11	8.85	<9.5	<9.5	36.3	36.8	<12	<9.7	<0.92	<11	11.6	<9.6				
Copper	1,500	65.4	1,310	1,130	4,310	1,510	3,080	332	5,170	152	98	658	529	18,500	2,290				
Iron	55,000	<5	<4.8	<4.3	<3.4	<3.8	<3.8	<4.9	95.5	<5.0	<3.9	<3.7	<4.4	<3.8	<3.9				
Lead	300	<12	<12	<11	<8.5	<9.5	<9.5	<11	<8.9	<12	<9.7	<9.2	<11	<9.5	9.6				
Selenium	100	<9.9	11	<8.6	7.57	8.96	9.21	<8.7	31.8	11.7	<7.8	9.11	<8.9	<7.6	46.4				
Zinc	2,800																		

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KBI Foundry Sand 2018 Annual Testing Data Summary

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Metal	OEPA BUGPFS01 Limit Total (mg/kg)	947	202	<100	554	190	762	962	1,560	279	652	549	2,040	<95			
Aluminum	77,000	947	<7.8	<8.0	<7.0	<7.1	<9.2	<7.2	<8.0	<6.5	<7.8	<0.435	<7.2	<7.6			
Antimony	31	<9.4	<2.0	<2.0	<1.7	<1.8	10.1	28.8	12.8	<1.6	<1.6	0.625	10.8	<1.9			
Barium	15,000	2.4	<0.98	<1.0	<0.87	<0.89	<1.2	<0.90	<0.99	<0.82	<0.97	<0.435	<0.90	<0.95			
Cadmium	39	1.2	16.2	<10	<8.7	<8.9	<12	62.5	<9.9	<8.2	<9.7	11.6	9.62	<9.5			
Copper	1,500	12	516	86.9	235	220	4,250	13,500	1,720	287	395	6,950	4,220	212			
Iron	55,000	24	<3.9	<4.0	<3.5	<3.6	7.7	<3.6	4	<3.3	<3.9	2.05	<3.6	<3.8			
Lead	300	4.7	<9.8	<10	<8.7	<8.9	<12	<9	<9.9	8.2	<9.7	<0.435	<9.0	<9.5			
Selenium	100	12	21.96	<8.0	13	<7.1	36.2	12.3	<8.8	<6.5	<7.8	5.52	9.42	<7.6			
Zinc	2,800	9.4															

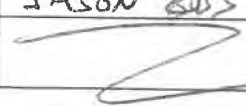
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Appendix B
Ohio EPA – Notice of Intent

Notice of Intent (NOI) for a Beneficial Use General Permit or Amended NOI Form

Submission of this NOI constitutes notice that the Applicant identified in Section 3 of this form is eligible to obtain coverage under Ohio EPA's beneficial use general permit program. Becoming a permittee obligates the Applicant to comply with the terms and conditions of the general permit. Complete all required information as indicated by the instructions.¹ **A check for \$200 must accompany this form and be made payable to "Treasurer, State of Ohio".**

1. General Permit Number: BUGPFS01			
2. Applicant's Information:			
Name: Kurtz Bros., Inc., RKDF, Inc., and KBCO, LLC.			
Mailing Address: 6415 Granger Road			
City: Independence	State: Ohio	Zip: 44131	
Contact Name: Jason Ziss	Title:		
Phone: (216) 986-7000	Fax: () -	E-mail: jasonz@kurtz-bros.com	
3. ²Generator's Information:			
Name: See attached list			
Mailing Address:			
City:	State:	Zip:	
Contact Name:	Title:		
Phone: () -	Fax: () -	E-mail:	
Optional: Second Generator's Information:			
Name:			
Mailing Address:			
City:	State:	Zip:	
Contact Name:	Title:		
Phone: () -	Fax: () -	E-mail:	
4. Beneficial Use Byproduct Storage/Management Location(s):			
Bridgeview Production Facility in Valleyview, OH		Avon Production Facility in Avon, OH	
RKDF Production Facility in Brooklyn Hts, OH		See attached list	
5. Is the sampling plan attached?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
6. Is the laboratory report and sampling analysis attached?		Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
7. Signature of the Applicant: (see Ohio Administrative Code 3745-599-25)			
By signing this document, I certify that all statements and all assertions of fact made in the document and attachments, to the best of my knowledge and belief are true and accurate, and comply fully with applicable beneficial use rules.			
Typed name: JASON ZISS		Title: BUSINESS DEVELOPMENT	
Signature: 		Date: 1/14/19	
For Agency Use Only			
Date Received: / /	Application/Revenue ID:	Organization ID:	
Document ID:	Place ID:	Check ID:	
Check Date: / /	Check Number:	Check Amount:	

¹ The \$200 fee also applies when submitting an Amended NOI Form when adding additional generators to a Permittee's General Permit.

² For multiple generators, attach additional pages to include each generator's information