Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

Jason Ziss
Kurtz Bros., Inc.
6415 Granger Rd
Independence, Ohio 44131

Re: **Earth 'N Wood Products, Inc**
Director's Authorization
Composting
Stark County
CM010791

Subject: **Earth 'N Wood Products, Inc Class II Composting Facility**
Registration No. 76-C2R-009060
Alternative Feedstock Approval: Marathon's Canton Refinery Materials

Dear Mr. Ziss:

In accordance with Paragraph (B) of Rule 3745-560-205 of the Ohio Administrative Code (OAC), the owner or operator of a Class II solid waste compost facility may accept alternative materials not otherwise authorized in paragraph (B) of OAC Rule 3745-560-210, after approval by the Director of the Ohio Environmental Protection Agency (Ohio EPA). On May 13, 2020, and addenda received on August 3, 2020, Kurtz Bros., Inc. submitted a request for approval to accept an alternative material at their Earth 'N Wood Products, Inc. class II composting facility located at 5335 Strausser St. NW, North Canton, Ohio, 44720 (Facility).

The alternative material proposed for acceptance is generated by Marathon Petroleum Company's Canton Refinery facility (Marathon) in Canton, Ohio. It consists of a mixture of an industrial wastewater treatment sludge from a biological tertiary wastewater treatment (bio-sludge) and lime slurry from well water softening that is then centrifuged to remove water, resulting in a centrifuge cake of 75 to 80 percent solid consistency.

The alternative feedstocks described in written documentation submitted on May 13, 2020, and addenda received August 3, 2020, are hereby approved by Ohio EPA as alternative feedstock for composting at the Facility, located at 5335 Strausser St. NW, North Canton, Ohio, subject to the following conditions:

1. The utilization of the alternative feedstocks shall be conducted in accordance with written documentation submitted on May 13, 2020, and addenda received August 3, 2020, (Attachment A) and in accordance with the following conditions and variations:

    a) The owner or operator must identify the specific mixing ratios used for the alternative feedstock. The mixing ratios shall be documented in the daily log of operations;

    b) If the alternative feedstock or a specific mixing ratio impede the composting process, or causes nuisance conditions, and/or upon request by Ohio EPA or the Stark County Health Department, the owner or operator shall abate the problems by:

        i. Remixing the composting mixture with other feedstocks, bulking agents or additives; or

ii. Disposing of the alternative feedstock or any material containing the alternative feedstock at a licensed solid waste disposal facility.

2. Composting of the alternative feedstock shall be operated in compliance with OAC Chapter 3745-560, "Solid Waste Composting Regulations" and OAC Rule 3745-15-07, "Air Pollution Nuisances Prohibited."

3. Ohio EPA, DMWM-NEDO, and the Stark County Health Department may enter the Facility during reasonable times, in accordance with applicable laws, to inspect, conduct tests, or examine records and reports concerning the composting of the alternative material and compliance with this authorization.

4. If, in the judgment of the Ohio EPA, the owner or operator is unable to abate nuisance conditions or has not complied with the conditions of this authorization, then the owner or operator shall, upon written notification, cease acceptance of the alternative material and dispose of all composting wastes that contain the alternative material at the composting facility at a licensed solid waste landfill.

5. Compost that meets the qualities standards for compost product specified in OAC Rule 3745-560-230 may be distributed for unrestricted use.

6. This approval is issued solely to the Earth 'N Wood Products, Inc. class II composting facility and is not transferable upon change of ownership. No other persons may compost the materials which are specified in this approval at the Earth 'N Wood Products, Inc. class II composting facility located at 5335 Strausser St. NW, North Canton, Ohio.

7. This authorization is limited to the centrifuged lime slurry and bio-sludge material from the Marathon Petroleum Company's Canton Refinery at 2408 Gambrinus Avenue SW in Canton, Ohio. The centrifuged lime slurry and bio-sludge materials must be of similar chemical composition, similar physical properties and consistent with the waste characterization profile submitted on May 13, 2020, and addenda received August 3, 2020. Centrifuged lime slurry and bio-sludge material containing sanitary waste water (sewage waste water) or meeting the definition of hazardous waste, shall not be delivered to the Facility.

8. The Facility shall submit a new waste characterization profile comparable to the profile addenda received on August 3, 2020, whenever any of the following occur:
   a) there is a process change at Marathon that feeds into the industrial wastewater treatment system; or
   b) five years from the issuance of this approval; or
   c) when requested by Ohio EPA.

9. This approval shall cease upon closure of the Facility and/or non-renewal of the annual operating license.

Issuance of this approval does not constitute expressed or implied agreement that the monitoring of the Facility, when performed and implemented in accordance with the approved terms and conditions, will constitute compliance with applicable State and Federal laws, rules, and regulations. Nor does issuance of this approval assure that necessary operating permits or licenses will be granted.

You are notified that this action of the Director of the Ohio Environmental Protection Agency is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the director's action. The appeal must be accompanied by a filing fee of $70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Angel Arroyo-Rodríguez at (614) 728-5336 or Alison Shockley at (614) 728-5335.

Sincerely,

Laurie A. Stevenson
Director

cc: Colum McKenna, DMWM-NEDO
Phil Revlock, Stark County Health Department
Ronald J. Marinelli, Marathon Petroleum Company

Appendix A

Ohio Environmental Protection Agency

Composting Alternative Materials Approval Request Form

Applicant Information

Facility Name		Registration #
Earth N' Wood Products Inc. - North Canton		**76-C2R-009060**
Facility Contact for this Project	Phone	Email
Jason Ziss	**(216) 986-7000**	**jasonz@kurtz-bros.com**
Additional Contact (optional)	Phone	Email

Alternative Materials Information

Proposed Use of Material: [X] Feedstock [ ] Bulking Agent [ ] Additive

Is this a temporary project? [ ] Yes [X] No If yes, proposed length of time to complete?

Expected length of time for materials acceptance: **on-going** Frequency of Delivery: **weekly**

Maximum amount of material to be accepted daily: **80 tons a week** **We would not receive more than 20 tons per day of this material.**

Describe the physical and chemical characteristics for the material requested (attach copies of applicable analytical data):

See attachment A.1. - Industrial Wastewater Treatment Bio-sludge, Lime Slurry, and Centrifuge Cake

How was the material generated/processed?

See attachment A.1. - Industrial Wastewater Treatment Bio-sludge, Lime Slurry, and Centrifuge Cake

Describe any known or potential contaminants or pathogens that may cause or threaten to cause adverse impact to public health, safety, or the environment.

See attachment A.1. - Industrial Wastewater Treatment Bio-sludge, Lime Slurry, and Centrifuge Cake

If potential contaminants or pathogens are identified, describe what mechanisms will be used to prevent exposure for those in contact with the material or unfinished compost containing the material.

The facility will provide safety information to the compost site workers, the terms of the approval, and product handling procedures. The facility will provide a designated space on the site for the processing of this material. Employees will be in enclosed cab wheel loaders during the mixing, and throughout the composting process.

Describe any impacts that may result from the acceptance of the material regarding odors, litter, vectors, leachate, or other operational requirements of OAC 3745-560. (Include methods to be used for control):

A description of impacts that may result from the acceptance of the material and control methods is included as Attachment A.2.

Explain how the alternative material might function appropriately as a feedstock, bulking agent, or additive.

The material will function as a feedstock, which will be blended with other compost, or marketed as a specialty product (depending on testing). If the gypsum content is high, the product will be marketed as a specialty product for breaking clay soils, etc. material will be distributed in topsoil blends or as specialty compost products.

Alternative Materials Request Form *Page 2*

Suppliers

Supplier 1

Supplier Name
Marathon Petroleum Company LP

Mailing Address
2408 Gambrinus Ave., SW

City	State	Zip
Canton	**Ohio**	**44706**

Contact Person	Phone
Ron Marinelli	**(330) 497-5731**

Supplier 2

Supplier Name

Mailing Address

City	State	Zip

Contact Person	Phone

Supplier 3

Supplier Name

Mailing Address

City	State	Zip

Contact Person	Phone

Methods

Composting method utilized to maintain an aerobic environment:

- [X] Windrow
- [ ] Aerated Static Pile
- [ ] Static Pile
- [ ] In Vessel
- [ ] Other Approved Method

Anticipated Moisture Content: **50 %** Incoming Alternative Material **50 %** Composting Mix

Percentage (%) of alternative material to be added to compost mixes: **33% - 50% ; this may change based on site conditions**

Approximate carbon to nitrogen ratio in composting mixes: **30:1**

How will the finished product be utilized: [X] Distribution [ ] On-site use [ ] Other (explain below)

Methods *(continued)*

Provide examples of similar projects, if any, for composting of this material in Ohio or elsewhere and results obtained. Include copies of any research papers or citations.

This material was approved and utilized as a class 2 compost feedstock for Barnes Nursery, Inc. The material was previously approved under Registration number 22-C2R-0001 (see Attachment A.3.)

Describe how the material will be processed upon arrival at the facility including if the material will be screened or shredded prior to incorporation into the composting process.

The material will be received on-site and blended with compost and carbon. The material will be heated and tested to ensure proper composting takes place. Periodic turning will take place. The material will then be ground and screened after reaching maturity.

What equipment will be utilized?

Front end loader, Screener, Grinder - possibly a Scarab Windrow Turner

Any special management requirements due to the physical, biological or chemical characteristics of the alternative material?

No

Specify time frames for active composting, curing and storage.

3 - 6 months depending on the time of year and temperature of the piles

Financial Assurance (Class I and II)

If applicable, attach a revised final closure estimate prepared in accordance with OAC 3745-560-05 to account for the increase in materials on-site and/or higher disposal costs.

The facility is confident that the total increase in material will not add to the financial closure estimates.

Attachment A.1.

Feedstock 1 - Industrial wastewater treatment bio-sludge

Describe the physical and chemical characteristics for the material requested (attach copies of applicable analytical data):
The material is industrial wastewater treatment bio-sludge (25-30% solids). It is made up of biological bugs from tertiary treatment of the facility's industrial wastewater. It is grey and has a clay-like consistency. The product does not contain any rock or foreign material. Laboratory analytical results are attached.

How was the material generated/processed?
The wastewater treatment plant processes hydrocarbon contact process water. The water travels through primary treatment that includes API separation, flocculating chemical and polymer are added in a DAF unit, followed by pH adjustment with acid or base determined by pH requirements. The secondary treatment has an equalization tank that flows to an aeration basin which includes biological bugs.

Describe any known or potential contaminants or pathogens that may cause or threaten to cause adverse impact to public health, safety, or the environment.
Potential material contaminants: recovery well water, boiler blowdown, brine water from cavern and treatment, hydrostatic testing water, alky deluge water, sanitary wastewater (emergency capability only, it's not hard piped, and the material will not be shipped if it is contaminated with sanitary wastewater), liquid and solid waste management activities, process water, petroleum contaminated water, industrial storm water, and non-industrial storm water.

Feedstock 2 - Lime Slurry

Describe the physical and chemical characteristics for the material requested (attach copies of applicable analytical data):
The material is lime slurry (25-30% solids). It consists of dehydrated lime combined with incoming water from the facility's water wells. It is white and has a clay-like consistency. The product does not contain any rock or foreign material. Laboratory analytical results are attached.

How was the material generated/processed?
Dehydrated lime is used to soften boiler house feed water. The lime combines with incoming well water in a mix tank and is used as a softening process.

Describe any known or potential contaminants or pathogens that may cause or threaten to cause adverse impact to public health, safety, or the environment.
Due to its lime content, the lime slurry has an elevated pH of 10.55.

Feedstock 3 - Centrifuge Cake

Describe the physical and chemical characteristics for the material requested (attach copies of applicable analytical data):
The material is centrifuge cake (75-80% solids). It consists of lime slurry and bio-sludge which are centrifuged into a centrifuge cake. The lime slurry is generated in the facility's softening process for

boiler house feed water. The bio-sludge is generated as part of the tertiary treatment of the facility's industrial wastewater. It is light grey and has a clay-like consistency. The product does not contain any rock or foreign material. Laboratory analytical results are attached.

How was the material generated/processed?
The refinery makes two byproducts on a consistent and regular basis. Biosludge is generated as part of the tertiary treatment of the facility's industrial wastewater. The biosludge is a mixture of water and "wasted" activated bacteria that degrades materials as part of the wastewater treatment process. Lime slurry is generated as part of the water softening process in a boiler house. The refinery uses large quantities of well water to be used as boiler feed water. Lime slurry is used in the softening process, so the well water does not leave large mineral deposits in the refinery equipment. These two by products are mixed together and sent through a centrifuge where the material is "dewatered" and a semi dry (60%) cake is produced. The material is dropped into roll-off boxes and is transported for either disposal or reuse.

Describe any known or potential contaminants or pathogens that may cause or threaten to cause adverse impact to public health, safety, or the environment.
Potential material contaminants: recovery well water, boiler blowdown, brine water from cavern and treatment, hydrostatic testing water, alky deluge water, sanitary wastewater (emergency capability only, it's not hard piped, and the material will not be shipped if it is contaminated with sanitary wastewater), liquid and solid waste management activities, process water, petroleum contaminated water, industrial storm water, and non-industrial storm water. Lime slurry: high p.H.

Attached copies on applicable analytical data