

RECEIVED

OCT 21 2016



OHIO EPA - DMWM - Civil & Environmental Consultants, Inc.

October 18, 2016

Ms. Holly Hillyer
Ohio Environmental Protection Agency
Division of Materials and Waste Management
PO Box 1049
Columbus, Ohio 43216-1049

Dear Ms. Hillyer:

Subject: Overview Report
Central Waste Disposal Facility
Permit to Install No. 02-14224
CEC Project 164-103.0001

Civil & Environmental Consultants, Inc. (CEC) is submitting the Overview Report for the Central Waste Disposal Facility (CWDF) in Alliance, Mahoning County, Ohio. The Overview Report assumes that the final closure of the CWDF shall be in accordance with Permit to Install (PTI) No. 02-14224 issued March 1, 2005 and the revised Final Closure/Post-Closure Plan dated February 9, 2016.

If you have any questions, please call us at 412-429-2324.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.

A handwritten signature in blue ink, appearing to read "Dan Tolmer", is positioned above the printed name and title.

Dan Tolmer, P.E.
Project Manager

A handwritten signature in blue ink, appearing to read "Duane R. Lanoue", is positioned above the printed name and title.

Duane R. Lanoue, P.E.
Principal

Enclosure

164-103.0001-L-Overview Rpt.10-18-16/P

OVERVIEW REPORT

CENTRAL WASTE DISPOSAL FACILITY ALLIANCE, MAHONING COUNTY, OHIO

Prepared for:



**OHIO ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF MATERIALS AND WASTE MANAGEMENT
PO BOX 1049
COLUMBUS, OH 43216-1049**

Prepared by:



**CIVIL & ENVIRONMENTAL CONSULTANTS, INC.
333 BALDWIN ROAD
PITTSBURGH, PA 15205**

CEC Project 164-103

October 18, 2016



Civil & Environmental Consultants, Inc.



TABLE OF CONTENTS

1.0	SITE HISTORY	1
1.1	PERMITTING HISTORY	1
1.2	SITE DEVELOPMENT	2
1.2.1	LINER SYSTEM	3
1.2.2	FINAL/TRANSITIONAL COVER SYSTEM	4
1.2.3	LEACHATE MANAGEMENT SYSTEM	5
1.2.2	GAS COLLECTION AND CONTROL SYSTEM	6
1.3	EVENTS DURING BANKRUPTCY	6
2.0	REGULATORY COMPLIANCE	8
2.1	PERMIT SUMMARY	8
2.2	AIR PERMIT COMPLIANCE	8
2.2.1	DEVIATION REPORTING	8
2.2.2	GAS MIGRATION MONITORING AND REPORTING	9
2.2.3	ANNUAL FEE EMISSIONS REPORT	9
2.2.4	GREENHOUSE GAS REPORTING	9
2.3	NPDES PERMIT COMPLIANCE	9
2.3.1	SURFACE WATER SAMPLING AND REPORTING	9
2.3.2	NPDES PERMIT RENEWAL	10
2.4	SURFACE WATER PERMIT COMPLIANCE	10
2.5	SOLID WASTE PERMIT COMPLIANCE	11
2.5.1	ANNUAL OPERATIONS REPORT	11
2.5.2	GROUND WATER DETECTION MONITORING AND REPORTING	11
2.6	WETLAND PERMIT COMPLIANCE	11
2.6.1	WETLAND MITIGATION MONITORING AND REPORTING	11



3.0	FINAL CLOSURE.....	13
3.1	APPROVED CLOSURE/POST-CLOSURE PLAN	13
3.2	CLOSURE CONSTRUCTION COMPONENTS	13
3.2.1	WASTE REGRADING	13
3.2.2	VERIFICATION OF EXISTING COVER IN UNLINED WASTE AREA.....	14
3.2.3	FINAL COVER CONSTRUCTION IN UNCAPPED AREA	14
3.2.4	REPAIRS OF 2008 FINAL COVER.....	15
3.2.5	LEACHATE FORCEMAIN FOR PHASE 2B LEACHATE SUMP	16
3.2.6	PASSIVE GAS VENTS	16
3.2.7	SURFACE WATER CHANNELS	16
3.2.8	SEDIMENTATION POND SEDIMENT CLEANOUT	17
3.2.9	PERIMETER ACCESS ROAD IMPORVEMENTS	17
3.3	EARTHWORK CONTRACTOR.....	17
3.4	CONSTRUCTION QUALITY ASSURANCE	17
3.5	MATERIALS PREQUALIFICATION	18
3.5.1	SOILS PREQUALIFICATION	18
3.5.2	GEOSYNTHETICS PREWQUALIFICATION.....	19
3.6	ESTIMATED CONSTRUCTION SCHEDULE	19
3.7	ESTIMATE OF PROBABLE CLOSURE COSTS	20
3.7	FINAL CLOSURE CERTIFICATION	21

APPENDICES

Appendix A PERMITS

Appendix B DRAWINGS



1.0 SITE HISTORY

Central Waste, Inc. (CWI) owned, operated, and was the permittee of the Central Waste Disposal Facility. The Central Waste Disposal Facility is located in Smith Township, Mahoning County, Ohio. The site address is 12003 Oyster Road, Alliance, Ohio, 44601, and is located north of Courtney Road and east of Oyster Road in Smith Township, Mahoning County, Ohio. A location map showing the site on a United States Geological Survey (USGS) quadrangle is included on the Title Sheet of the drawing package. There is approximately 1,188 acres of property at this location. Drawing 2A of the PTI presents the property and facility boundaries and is provided in Appendix A.

1.1 PERMITTING HISTORY

A 26.0 acre disposal area for non-hazardous industrial waste and municipal waste under PTI 02-880 was approved in 1982. This disposal area ceased waste acceptance and closed in May 1994 in accordance with the 1976 rule requirements.

The site expanded into a non-contiguous 15.0 acre new unit south of the closed landfill under PTI 02-4934 approved March 26, 1992 with a permitted capacity of 1,258,000 cubic yards. The new unit included what are currently known as Phases 1 and 2. The Phase 1 liner system was certified on January 6, 1995. CWI began accepting waste in the Phase 1 cell area on March 1, 1996.

A 5.4 acre expansion over portions of the closed landfill constructed under PTI 02-880 was approved as Environmental Improvement PTI (EIPTI) 02-10964 in May 1997 to improve leachate collection and surface water drainage. The EIPTI area included Best Available Technology consisting of a composite liner, leachate collection system and cap system. The EIPTI area provided 152,000 cy of waste capacity. The EIPTI area was capped in 1998 and certified as closed on April 27, 1999.



A 3.8-acre contiguous lateral and vertical expansion to the new unit was approved under PTI 02-13262 on August 7, 2000 with a permitted capacity of 907,630 cubic yards. The expansion area was designated as Phase 3 and increased final waste grades from a 4H:1V to 3H:1V slopes with drainage benches constructed into the slopes.

A 42.0 acre contiguous lateral and vertical expansion was approved under PTI 02-14224 on March 1, 2005 with a permitted capacity of 6,221,040 cubic yards. The landfill expansion consisted of 37.9 acres of area located northwest of the new unit and 4.1 acres of overlay area over Phase 2 of the new unit. The lateral expansion was designated as Phases 4, 5, 6 and 7. The landfill expansion also provided for the relocation of non-hazardous industrial waste and regulated asbestos containing material placed under PTI 02-880 and municipal solid waste placed under EIPTI 02-10964.

The permitted limit of waste placement is approximately 56.7 acres. As of October 2016, waste has been placed in Phases 1 through 6B over approximately 46.0 acres.

CWI also submitted a Permit to Install Application (PTI No. 02-23006) modification designated as the South Unit – Phase 7 Expansion for a proposed 15.7 acre contiguous lateral and vertical expansion of the Central Waste Disposal Facility. PTI Application proposed to extend the areal limits of solid waste placement north of the existing limits, revise Phase 7 and overlay previously permitted portions of the landfill. CWI received Notice of deficiency letters from the Ohio EPA dated May 5, 2009, January 27, 2010 and February 12, 2010. No response to the Ohio EPA comments or revised PTI Application was submitted.

1.2 SITE DEVELOPMENT

The following outlines the engineered components constructed in accordance with PTI 02-14224 including construction of cell liner/leachate collection systems, final/transitional cover, leachate collection and storage tank and containment structure, and gas collection and control system. Upon approval of the PTI 02-14224, Civil & Environmental Consultants, Inc. (CEC) has assisted CWI with the design, bidding and Construction Quality Assurance (CQA) services.



1.2.1 Liner System

CWI has completed the waste relocation and construction of each cell liner and leachate collection system for Phases 4, 5 and 6. The components of the liner system, from the top to bottom, include:

SIDESLOPE AREA (All Phases)

- 12-inch thick Protective Cover Layer (Bottom Ash);
- Double-Sided Geocomposite;
- 60 mil HDPE Textured Geomembrane;
- 5-foot thick Recompacted Soil Liner (RSL); and
- Structural fill (where needed).

FLOOR AREA (Phases 4A and 4B)

- 6 oz/sy filter geotextile;
- 15-inch thick Leachate Drainage Layer (Bottom Ash);
- 8 oz/sy cushion geotextile;
- 60 mil HDPE Textured Geomembrane;
- 5-foot thick RSL; and
- Structural fill (where needed).

FLOOR AREA (Phases 5A, 5B, 6A AND 6B)

- 15-inch thick Leachate Drainage Layer (AASHTO No. 9 aggregate);
- 8 oz/sy cushion geotextile;
- 60 mil HDPE Textured Geomembrane;
- 5-foot thick RSL; and
- Structural fill (where needed).

CEC prepared the bid documents, collected prequalification samples for structural fill and RSL, prequalified the geosynthetic materials including interface shear strength testing, performed



Construction Quality Assurance (CQA) services and prepared the construction record documentation reports for each cell.

The following summarizes the cell construction timeline:

Phase No.	Cell Construction Schedule	Cell Area (acres)
4A	October 2006 – June 2007	2.4
4B	October 2006 – July 2007	7.4
5A	July 2007 – November 2007 and April 2008	5.1
5B	February 2008 – June 2008	1.8
6A	March 2008 – November 2008	6.5
6B	February 2009 – July 2009	3.7

The Ohio EPA concurred with the construction record documentation reports for each cell.

In conjunction with the construction of Cells 5A, 5B, 6A and 6B, existing waste under PTI 02-880 was excavated and relocated within the existing lined cell. Waste relocation occurred prior to the construction of each cell and a separate construction record documentation report was submitted by CEC to the Ohio EPA. The Ohio EPA concurred with the construction record documentation reports for each waste relocation event.

At the completion of waste relocation activities for the Phase 5A, 5B and 6B liner construction, the southern edge of the unlined waste was temporarily covered with intermediate cover. The undisturbed portion of the unlined waste area was closed with a “1976 Cap” in accordance with Ohio EPA Guidance Document 0123. The Closure Plan addresses the closure of the southern edge of the unlined waste area.

1.2.2 Final/Transitional Cover System

The components of the final cover system, from the top to bottom, include:



- 30-inch thick Vegetative Cover/Frost Protection Layer;
- Double-Sided Geocomposite;
- 40 mil Textured Linear Low Density Polyethylene (LLDPE) Geomembrane;
- 18-inch thick Recompacted Soil Barrier (RSB); and
- 12-inch thick Intermediate Cover.

In 2008, a 10.6 acre final cover system construction was partially completed. Construction was halted when a portion of the vegetative cover and geocomposite on the lower southwest slope failed. When halted, the installation of the recompacted soil barrier, geomembrane and geocomposite layers had been completed. Approximately 5.8 acres of vegetative cover layer had been placed. In addition, approximately 4.8 acres of 2-foot thick transitional cover was constructed in 2008 on the east and west slopes directly north of the 2008 final cover construction.

As a temporary measure to comply with the phase development plans for Phases 1-3, a construction record documentation report was submitted to certify the 15.3 acres met the requirements of transitional cover. The Ohio EPA concurred with the report in a letter dated November 21, 2008. The Closure Plan addresses the completion and repair of the 2008 final cover system and transitional cover.

1.2.3 Leachate Management System

The leachate management system includes leachate sumps, pumps, forcemain piping and storage tanks. Leachate collection sumps are located in Cells 1, 2A, 2B, 4A, 6A and 6B. Pumps within the sumps discharge leachate to the aboveground leachate storage tank via dual-contained HDPE forcemain piping. The site currently has two 30,000 gallon belowground leachate storage tanks and one 185,000 gallon aboveground leachate storage tank. The belowground leachate storage tanks were constructed and operating at the time PTI 02-14224 was approved. The belowground leachate storage tanks have not been in use since 2013. The current 185,000 gallon aboveground leachate storage tank, containment area and associated pumps and controls were constructed in 2008. A construction record documentation report was submitted to certify the aboveground



leachate management system on November 7, 2008. The Ohio EPA concurred with the report in a letter dated December 1, 2008.

1.2.4 Gas Collection and Control System

An active gas collection and control system (GCCS) was constructed in Phases 1 through 3 in 2010 and included 16 gas extraction wells, aboveground header and lateral piping, a condensate sumps and a blower/open flare facility. The Ohio EPA concurred with the report in a letter dated April 18, 2011. The GCCS operated through December 2011, when the gas generation at the site decreased to less than the minimum required flow needed to operate the flare. The Closure Plan addresses the conversion of the active gas extraction wells to passive gas vents and the installation of additional passive gas vents in Phases 4, 5 and 6.

1.3 EVENTS DURING BANKRUPTCY

On June 13, 2012, Central Waste, Inc. filed for bankruptcy. Central Waste, Inc. ceased accepting waste on this date. The Mahoning County District Board of Health (MCDBOH) informed Central Waste, Inc. in a Notice of Violation letter dated June 19, 2013 that they had triggered mandatory final closure in accordance with OAC 3745-27-11(C) since they had not accepted waste over a one year period.

Due to CEC's experience at the site prior to June 13, 2012, Bond Safeguard Insurance Company (BSIC) contracted with CEC to respond to Ohio EPA and MCDBOH Notice of Violations (NOVs) and assist BSIC with meeting compliance requirements in accordance with the Ohio EPA regulations and PTI 02-14224 permit conditions.

Beginning in July 2013, CEC worked with Eagon & Associates of Columbus, Ohio to respond to several Ohio EPA NOVs related to Groundwater Detection Monitoring Plan. Eagon coordinated the installation of additional groundwater monitoring wells to address comments related to the interconnection of the mine spoil and bedrock. Eagon also responded to comments related to groundwater wells associated with assessment monitoring. Eagon continued semi-annual



groundwater detection monitoring. In conjunction with these services, Eagon revised the Groundwater Detection Monitoring Plan, Groundwater Quality Assessment Plan and the Statistical Analysis Program, as needed, to maintain compliance.

CEC responded to Ohio EPA and MCDBOH NOV's for other compliance violations including Annual Operations Reports, air emission reporting, gas migration monitoring, surface water monitoring, wetland mitigation monitoring, erosion and sediment control, and leachate management system maintenance.



2.0 REGULATORY COMPLIANCE

This section summarizes the compliance monitoring and reporting required for each permit associated with the Central Waste Disposal Facility.

2.1 PERMIT SUMMARY

The following table lists the current permits associated for the landfill:

Permit Description	Permit No.	Approval Agency	Effective Date
PTI – Fugitive Emissions	02-18642	Ohio EPA-DAPC	1-18-05
Title V Permit	Pending	Ohio EPA-DAPC	Pending
PTI – Solid Waste Facility	02-14224	Ohio EPA-DSIWM	3-1-05
NPDES Individual Permit	3IN00313*FD	Ohio EPA-DSW	2-28-12; Modified 4-1-15
PTI – Borrow Area C	657122	Ohio EPA-DSW	10-7-08
PTI – Constructed Wetland	658287	Ohio EPA-DSW	10-7-08
PTI – Borrow Area A	726093	Ohio EPA-DSW	11-7-09
Isolated Wetlands Permit – Borrow Area	093501	Ohio EPA-DSW	5-12-09
Isolated Wetlands Permit – Railroad Tracks/Bldg Area	073236	Ohio EPA-DSW	12-26-07
Nationwide Permit No. 14– Railroad Tracks/Bldg Area	2007-289	ACOE	12-6-07

The permits are provided in Appendix B.

2.2 AIR PERMIT COMPLIANCE

2.2.1 Deviation Reporting

BSIC's site manager completed daily air inspection at the landfill. CEC has been completing and submitting the quarterly and semi-annual deviation reports via the eBusiness Center.



2.2.2 Gas Migration Monitoring and Reporting

American Environmental Group completed the monthly gas migration monitoring and submitted results to the Ohio EPA.

2.2.3 Annual Fee Emissions Report

Tier II testing was completed in November and December 2014 to determine if the site meets the minimum NSPS requirements for NMOC emission rate. The Tier II Landfill Gas Sampling Annual Report dated March 4, 2015 indicated that the NMOC emissions rate for the site in 2014 is below the NSPS emissions threshold of 50 Mg/yr based on the site-specific NMOC concentration yielded during the sampling event. Since the NMOC emissions rate is below the 50 Mg/yr threshold and no additional waste will be accepted, the NMOC emissions rate will not increase over time. Based on the NMOC emissions rate, an explosive gas collection and control system is not required per NSPS.

CEC has been completing and submitting the Annual Fee Emission Reports via the eBusiness Center.

2.2.4 Greenhouse Gas Reporting

CEC has been completing and submitting the Annual Greenhouse Gas Reports for the landfill via the e-GGRT website.

2.3 NPDES PERMIT COMPLIANCE

2.3.1 Surface Water Sampling and Reporting

The NPDES Permit includes sampling from the following four outfalls:

- Outfall 003 – South Sedimentation Pond



- Outfall 004 – North Sedimentation Pond
- Outfall 005 – Silt Trap A
- Outfall 006 – Silt Trap B

BSIC's site manager collected daily, weekly, monthly, quarterly and semi-annual samples at the landfill as required by the NPDES Permit. BSIC's site manager completed and submitted the electronic Discharge Monitoring Reports (e-DMR).

2.3.2 NPDES Permit Renewal

The site's NPDES Permit 3IN00313*FD expires on February 28, 2017. The NPDES Permit Renewal application was due 180 days prior to the expiration date or September 1, 2016.

2.4 SURFACE WATER PERMIT COMPLIANCE

No additional requirements are required for the constructed wetland near the rail unloading facility (PTI 658287)

Borrow Area A (PTI 726093) located east of the landfill has a permitted grading plan which incorporates silt traps. Borrow Area A has not been used in several years and is currently vegetated. No soils from Borrow Area A will be required for the completion of the closure construction.

Borrow Area C (PTI 657122) is located southwest of the landfill and is permitted to discharge through Silt Trap A, located southeast of the landfill. The discharge from Silt Trap A (Outfall 005) is sampled under the NPDES Permit. Soil for the closure construction including structural fill, recompacted soil barrier and vegetative cover will come from Borrow Area C.



2.5 SOLID WASTE PERMIT COMPLIANCE

2.5.1 Annual Operations Report

CEC has been completing the Annual Operations Reports for the landfill and submitting to the Ohio EPA.

2.5.2 Ground Water Detection Monitoring and Reporting

Eagon has been completing the semi-annual groundwater detection and assessment monitoring, performing the statistical analysis and submitting the Groundwater Detection Monitoring Reports to the Ohio EPA.

2.6 WETLAND PERMIT COMPLIANCE

2.6.1 Wetland Mitigation Monitoring and Reporting

CEC has performed the mitigation monitoring requirements established by the Ohio Environmental Protection Agency (Ohio EPA) in the Isolated Wetlands Permit and the U.S. Army Corps of Engineers (USACE) Nationwide 14 permit. The permits require mitigation monitoring at both sites for five years after project completion, including two monitoring events per year for the first two years and once per year for the remaining three years.

One of the mitigation sites (Ohio EPA ID No. 073236 and Nationwide Permit 2007-289, aka Railroad Mitigation Area) completed the fifth year of post-construction monitoring during 2014. The Ohio EPA issued a letter dated June 15, 2015 stating the mitigation for wetland impacts was in compliance with the permit and no additional reporting is necessary. The USACE issued a letter dated September 24, 2015 stating the mitigation for this project has been successful and the monitoring requirements are fulfilled.



The other mitigation site (Ohio EPA ID No. 093501, aka Soil Borrow Mitigation Area) completed the third year of post-construction monitoring during 2014 and the next event will be the fourth year of post-construction monitoring. CEC has completed three years of monitoring. In a letter dated June 15, 2015 from the Ohio EPA, the mitigation is on track for successful completion by the end of the monitoring period.

As a condition of being issued the Isolated Wetland Permits, the Army Corps and Ohio EPA have required that Central Waste, Inc. obtain mitigation property and to protect this property in perpetuity with an environmental covenant. The Ohio EPA contacted CEC regarding the need to record an environmental covenant for the mitigation sites. A draft environmental covenant has been prepared. This document must be reviewed, approved, and signed by the Ohio EPA prior to recording the conservation easement.



3.0 FINAL CLOSURE

3.1 APPROVED CLOSURE/POST-CLOSURE PLAN

The Final Closure/Post-Closure Plan (FC/PC Plan) was submitted to the Ohio EPA on October 30, 2015 with subsequent revised submittals dated December 16, 2015 and February 9, 2016 to respond to Ohio EPA comments. The Ohio EPA approved the FC/PC Plan in a letter dated February 16, 2016. However, the letter erroneously references the FC/PC Plan dated December 16, 2016. BSIC has requested that the Ohio EPA provide an updated approval letter which references the correct version of the FC/PC Plan dated February 9, 2016.

3.2 CLOSURE CONSTRUCTION COMPONENTS

The final closure of the Central Waste Disposal Facility will require the following construction:

- Waste Regrading
- Verification of Existing Cover in Unlined Waste Area
- Final Cover Construction in Uncapped Areas
- Repair of 2008 Final Cover
- Leachate Forcemain for Phase 2B Leachate Sump
- Passive Gas Vents
- Surface Water Controls
- South Sedimentation Pond Sediment Cleanout
- Perimeter Access Road Improvements

3.2.1 Waste Regrading

The existing waste grades will need to be regraded to achieve the final waste grades approved in the Closure/Post-Closure Plan. Final waste grades are approved at a minimum waste grade of 3% over approximately 6.3 acres and at a minimum 5% and maximum 3H:1V slopes for the remaining portions of the 46 acres of waste placement. The 3% waste grade was necessary to



minimize the total volume of waste relocation and obtain a balance between the excavation and fill volumes. The balance of excavation and fill waste volumes is necessary so that additional waste does not need to be hauled offsite for disposal or so that additional waste or soil does not need to be hauled to the landfill. The 3% grade provides that positive drainage can be maintained and that ponding areas will not develop during settlement of waste over time. Achieving the final waste grades will require approximately 46,500 cy of waste excavation and fill placement.

3.2.2 Verification of Existing Cover in Unlined Waste Area

In conjunction with the construction of the cell liner system for Phase 5 through 6B, existing waste within previously unlined areas within the permitted limits of waste permitted under PTI No. 02-880, was required to be relocated onto lined areas. At the completion of waste relocation activities for the Phase 5A, 5B and 6B liner construction, the southern edge of the unlined waste was temporarily covered with intermediate cover. The undisturbed portion of the unlined waste area was closed with a “1976 Cap” in accordance with Ohio EPA Guidance Document 0123.

The FC/PC Plan allows the verification that a minimum thickness of 2 feet of soil is present along southern edge of the unlined waste area. Test pits will be excavated on a 50 foot spacing to verify the thickness of the existing soil cover. If the test pits indicate that less than 2 feet of soil exists in any areas, additional soil will be placed in accordance with the requirements for recompacted soil barrier construction.

3.2.3 Final Cover Construction in Uncapped Areas

Approximately 35 acres of uncapped waste north of the 2008 final cover construction will be capped. In accordance with PTI 02-14224, the components of the permitted final cover system, from the top to bottom, include:

- 30-inch thick Vegetative Cover/Frost Protection Layer;
- Double-Sided Geocomposite Drainage Layer;



- 40-mil textured Linear Low Density Polyethylene (LLDPE) Flexible Membrane Liner (FML);
- 18-inch thick RSB; and
- 12-inch Intermediate Cover.

Drawing No. 6 of the FC/PC Plan shows the uncapped area and is provided in Appendix A.

3.2.4 Repair of 2008 Final Cover

In 2008, a 10.6 acre final cover system construction was partially completed. Construction was halted when a portion of the vegetative cover and geocomposite on the lower southwest slope failed. When halted, the installation of the recompacted soil barrier, geomembrane and geocomposite layers had been completed. Approximately 5.8 acres of vegetative cover had been placed.

Of the 5.8 acres with vegetative cover, a 3.3 acre area was not affected by the final cover failure and the vegetative cover was almost completed in this area. This area encompasses portions of the east and west slopes in the northern most area of the 2008 final cover system. CEC evaluated the static and seismic stability of this area in the FC/PC Plan based on the existing grades and interface test results of the final cover components. The required factors of safety for static and seismic stability were met. This area will only require the completion of the 30-inch thick vegetative cover layer. The remaining 2.5 acres of vegetative cover will need to be removed to remove the geosynthetics associated with the final cover failure.

Approximately 4.8 acres of the partially constructed 2008 final cover system has exposed geosynthetics. Based on temperature monitoring of the RSB layer and the information provided in the FC/PC Plan, only the top lift of the RSB requires repair and recompaction to the approved Best Fit Line of Optimums compaction criteria to meet the minimum permeability requirement.



Approximately 7.3 acres of existing geosynthetics (geomembrane and geocomposite) will need to be removed and replaced with new geosynthetics. Once the geosynthetics have been installed, the 30-inch thick vegetative cover shall be placed.

Drawing No. 6 of the FC/PC Plan shows the 2008 final cover repair area and is provided in Appendix A.

3.2.5 Leachate Forcemain for Phase 2B Leachate Sump

In 2012, the Phase 2B leachate collection sump riser broke at the elbow located approximately 70 feet below the surface. At that time, a pump was installed at the Phase 2B leachate collection pipe cleanout and lowered to the Phase 2B sump. A temporary forcemain pipe was installed from the Phase 2B leachate collection pipe cleanout to the leachate forcemain pipe near the Phase 2A leachate sump riser. This temporary system has been operating to maintain the required minimum 12-inch head of leachate on the liner. Since it is not feasible to repair the existing Phase 2B sump riser pipe, CEC proposes to upgrade the temporary system as a permanent system. The temporary forcemain will be revised from a single-contained forcemain pipe to a dual-contained forcemain pipe installed within the waste below the final cover system. The dual-contained forcemain pipe will provide protection during final cover construction and allow for leak detection at designated leak detection risers.

3.2.6 Passive Gas Vents

A passive gas venting system will be installed to remove landfill gas through a series of vents spaced across the landfill. Sixteen gas extraction wells were previously installed and will be retrofitted as passive gas vents. An additional 29 passive gas vents will be installed in conjunction with final cover construction.



3.2.7 Surface Water Controls

Surface water drainage channels and letdown structures will be constructed in accordance with the approved permit and this Closure Plan.

The drainage areas to the North Sedimentation Pond have been eliminated since the final phase, Phase 7, was not constructed. The North Sedimentation Pond riser structure of the principal spillway will be removed to allow the pond to drain.

3.2.8 Sedimentation Pond Sediment Cleanout

The south sedimentation pond has approximately 2-feet of sediment accumulated across the bottom of the pond with a thicker layer located at the inlet to the pond. The fore bay of Silt Trap A also has a thick layer of sediment. Although not required as part of the Closure Plan, removal of the sediment was proposed by BSIC as part of the project to return the pond to its original capacity.

3.2.9 Perimeter Access Road Improvements

The perimeter access road around the landfill requires improvements to eliminate ponding areas and repair erosion rills across the road. The road is used for inspections and for access to gas monitoring probes and groundwater monitoring wells. Drawing No. 2 of the FC/PC Plan shows the perimeter access road and is provided in Appendix A.

3.3 EARTHWORK CONTRACTOR

In preparation for the closure construction at the landfill, BSIC requested bids from several earthwork contractors in April 2015. Tucson Incorporated of New Philadelphia, Ohio was selected to perform the closure construction. Since April 2015, the scope of the closure construction has been revised and some bid items required updated costs. Tucson provided an updated bid based on a revised set of bid documents dated May 2016 for the closure



construction. Prior to closure construction, it should be anticipated that a new bid should be obtained to accommodate the fluctuation of 2017 geosynthetics pricing and inflation.

Tucson has constructed several cell liner and final cover systems at landfills throughout Ohio. Tucson has assisted BSIC with intermediate cover placement and erosion and sediment control maintenance over the past few years. With Tucson's experience at this landfill and their involvement throughout the final closure process, they provide the Ohio EPA with the overall project knowledge to complete the closure of the landfill in a timely and cost efficient manner.

3.4 CONSTRUCTION QUALITY ASSURANCE

CEC provided BSIC with a proposal to perform the following task for the closure construction:

- Engineering support;
- Prequalification of recompacted soil barrier;
- Prequalification of the geosynthetics QA/QC testing and interface shear strength testing;
- Project management;
- Meetings;
- Coordination and review of the certification survey for each soil layer;
- CQA services; and
- Construction record documentation report.

CEC has performed the CQA services for all the cell liner and final cover construction at the landfill discussed in Section 1.2 of this report. CEC has several years of performing CQA services for cell liner and final cover construction at landfills throughout Ohio. With CEC's experience at this landfill both historically and with the final closure specifically, we are situated to provide assistance to the Ohio EPA with the closure of the landfill.

Certification surveying services were to be performed by Akins Surveying of Alliance, Ohio. Akins has several years of experience at the landfill for both site operations and cell liner and



final cover construction. Akins is located close to the site and were available as needed to certify cell liner and final cover components to allow the contractors to continue working.

3.5 MATERIALS PREQUALIFICATION

3.5.1 Soils Prequalification

RSB material is located within Borrow Area C. RSB samples will need to be collected at a frequency of one per 1,500 cubic yards and tested in accordance with the CQA/QC Plan. The geotechnical laboratory soils data shall be reviewed to determine if the results are in accordance with the CQA/QC Plan. The soils prequalification report will discuss the sampling methods, representative sample volume dimensions, test results, and the best fit line of optimum placement criteria. The criteria for soil acceptance will be in accordance with the BFLO equation established for the Central Waste Disposal Facility.

A Soils Prequalification Report was submitted to the Ohio EPA on December 16, 2015 for half of the required RSB material. The Ohio EPA provided concurrence with the Soils Prequalification Report in a letter dated January 12, 2016. A Soils Prequalification Report for the remaining volume of RSB material will need to be submitted at least 7 days prior to construction.

The vegetative cover material does not require a prequalification report to be submitted to the Ohio EPA.

3.5.2 Geosynthetics Prequalification

Geosynthetics quality control (QC) testing provided by the manufacturer and the QA conformance test will be required for the geomembrane and geocomposite drainage layer. Coordination will be required with the geosynthetics suppliers to collect and send QA samples directly to the geosynthetics laboratory for material quality assurance (QA) conformance testing as per the approved CQA/QC Plan.



The data shall be reviewed upon receipt so that any potential issues with the materials can be identified and addressed. The test frequencies and results shall be confirmed to be in conformance with the approved CQA/QC Plan.

CEC has completed the interface shear strength testing in accordance with the CQA/QC Plan. CEC submitted the final results to the Ohio EPA on December 16, 2015. No concurrence letter has been received from the Ohio EPA. If the same geosynthetics material and supplier as is indicated in the interface report is used, no additional interface shear strength testing is required.

3.6 ESTIMATED CONSTRUCTION SCHEDULE

Tucson estimated the following preliminary construction schedule for this project:

Construction Item	Duration
Waste Regrading 1976 Cap Thickness Verification	4 weeks
2008 Final Cover Repair and Completion Phase 2B Leachate Collection System RSB Placement Geosynthetics Installation Frost Protection/Vegetative Cover Placement Geocomposite Drainage Layer Outlets Installation Passive Gas Vent Installation Surface Water Control Structure Installation Revegetation Sedimentation Pond Cleanout	24 weeks for earthwork; 10 weeks for geosynthetics;

3.7 ESTIMATE OF PROBABLE CLOSURE COSTS

CEC is providing the following estimate of probable closure costs based on discussions with BSIC during the bidding process:



Service	Estimate of Probable Costs
Earthwork and Geosynthetics Construction	\$4,200,000
Certification Survey	\$40,000
Construction Quality Assurance Services	\$350,000
TOTAL	\$4,590,000

3.8 FINAL CLOSURE CERTIFICATION

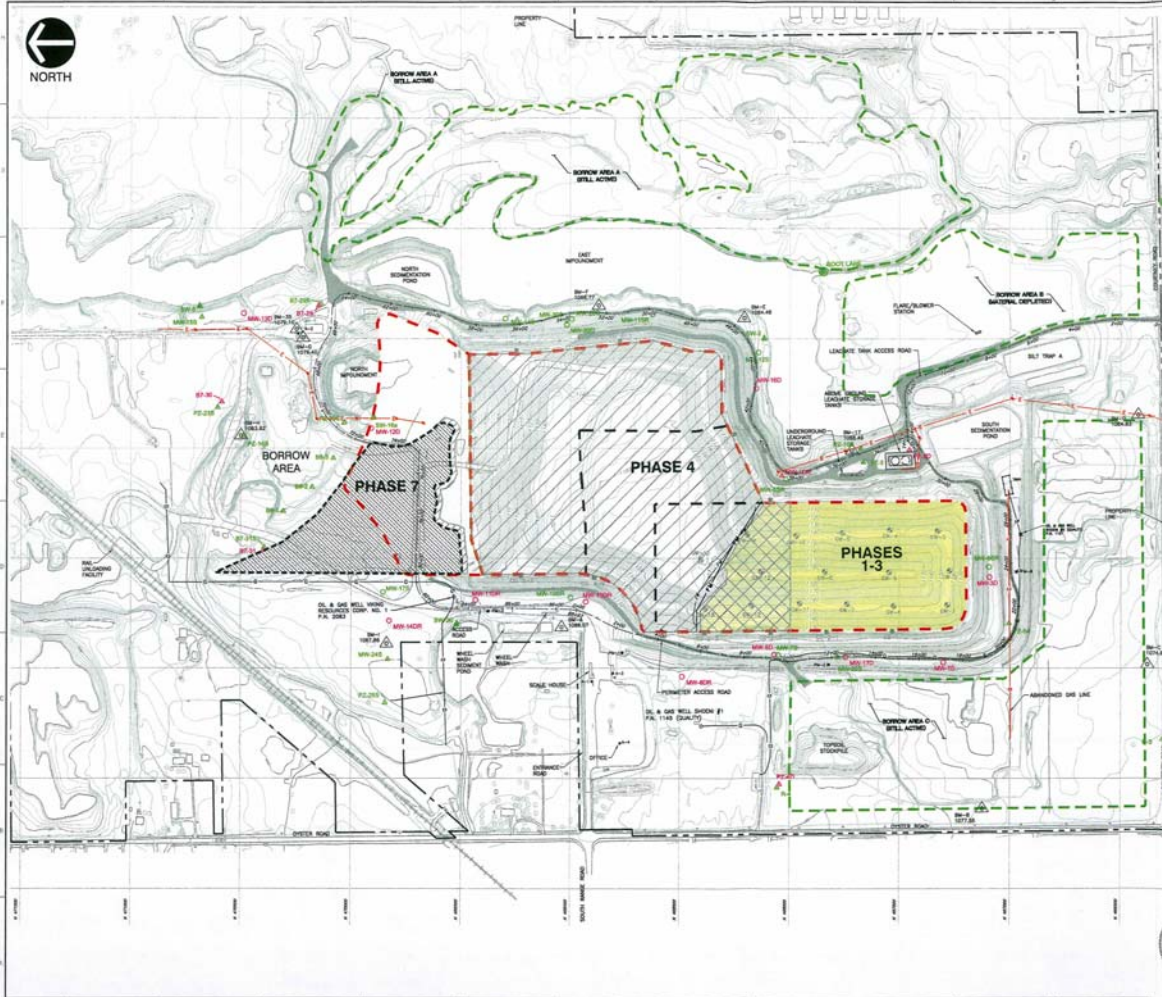
Not later than 90 days after the completion of final closure activities, a written certification report including verification that the landfill has been closed in accordance with Rule 3745-27-11 and this Closure Plan shall be submitted to the Ohio EPA Northeast District Office for concurrence and District Board of Health – Mahoning County.

The Final Closure Certification will include a copy of the plat and deed showing the notation required by Paragraph 11(H)(5) of the Closure Plan and bearing the mark of recordation of the office of Mahoning County.

The Final Closure Certification will also include a demonstration that the sign required by Paragraph 11(H)(6) has been posted and that all entrances and access roads have been blocked as required by Paragraph 11(H)(7) of the Closure Plan.

APPENDIX A

DRAWINGS



REVISION RECORD	
NO.	DATE
1	08/01/2011
2	08/01/2011
3	08/01/2011
4	08/01/2011
5	08/01/2011
6	08/01/2011
7	08/01/2011
8	08/01/2011
9	08/01/2011
10	08/01/2011

SUBMITTAL RECORD	
NO.	DATE
1	08/01/2011
2	08/01/2011
3	08/01/2011
4	08/01/2011
5	08/01/2011
6	08/01/2011
7	08/01/2011
8	08/01/2011
9	08/01/2011
10	08/01/2011

LEGEND	
EXISTING CONTOUR	EXISTING CONTOUR
POTENTIAL LIMIT OF WASTE	POTENTIAL LIMIT OF WASTE
EXISTING LIMIT OF WASTE	EXISTING LIMIT OF WASTE
BORROW AREA LIMIT	BORROW AREA LIMIT
LIMIT OF EXISTING PLS 20-250 AREA	LIMIT OF EXISTING PLS 20-250 AREA
EXISTING UNDERGROUND ELECTRIC	EXISTING UNDERGROUND ELECTRIC
EXISTING OVERGROUND ELECTRIC	EXISTING OVERGROUND ELECTRIC
EXISTING GAS LINE	EXISTING GAS LINE
ABANDONED GAS LINE	ABANDONED GAS LINE
EXISTING FORDHAM	EXISTING FORDHAM
FACILITY BENCHMARK LOCATION	FACILITY BENCHMARK LOCATION
SURFACE WATER SHEDDING LOCATION	SURFACE WATER SHEDDING LOCATION
SURFACE WATER GULCH	SURFACE WATER GULCH
GLACIAL/WINE SPILL PREDICTOR	GLACIAL/WINE SPILL PREDICTOR
GLACIAL/WINE SPILL MONITORING WELL	GLACIAL/WINE SPILL MONITORING WELL
ROCKWELL PREDICTOR	ROCKWELL PREDICTOR
ROCKWELL MONITORING WELL	ROCKWELL MONITORING WELL
BALANCE GAS MONITOR	BALANCE GAS MONITOR
PERMANENT GAS MONITORING PRESSURE	PERMANENT GAS MONITORING PRESSURE
EXISTING GAS EXTRACTION WELL	EXISTING GAS EXTRACTION WELL
EXISTING LANDFILL BARRIER CLOSURE	EXISTING LANDFILL BARRIER CLOSURE
PT 101-102 AREA WITH 1015 DAP	PT 101-102 AREA WITH 1015 DAP
3000 DAP WITH PARTIAL FINAL COVER	3000 DAP WITH PARTIAL FINAL COVER
AREA WITH INTERMEDIATE COVER	AREA WITH INTERMEDIATE COVER
AREA WITH TRANSITIONAL COVER (SEE NOTE 1)	AREA WITH TRANSITIONAL COVER (SEE NOTE 1)

NOTES

1. THE AREA REQUIRED STOPPING OF IN-PLACE TRANSITIONAL COVER FOR USE IN THE WASTE STOPPING IS IN THE CONSTRUCTION OF THE FINAL COVER SYSTEM.

REFERENCE

1. TOPOGRAPHIC MAPS PREPARED BY REGAL AERIAL MAPPING FROM AERIAL PHOTOGRAPHY DATED AUGUST 8, 2005.

2. GROUND SURVEY DATED 10/17/11 PERFORMED BY AGS.



Civil & Environmental Consultants, Inc.
333 Parkway Road - Pittsburgh, PA 15201
PH: 412.426.2244 FAX: 412.426.2114
WWW.CECINC.COM

BOND SAFEGUARD INSURANCE COMPANY
CLOSURE PLAN
CENTRAL WASTE DISPOSAL FACILITY
ALLIANCE, OHIO

DATE: 08/01/2011 BY: [Signature] TITLE: [Title]
SCALE: AS SHOWN

EXISTING SITE CONDITIONS

2



REVISION RECORD	
NO.	DESCRIPTION
1	ISSUED FOR PERMIT

SUBMITTAL RECORD	
NO.	DESCRIPTION
1	ISSUED FOR PERMIT

LEGEND

- EXISTING CONTOUR
- PROPOSED LIMIT OF WASTE
- EXISTING LIMIT OF WASTE
- BURNING AREA A
- BURNING AREA B
- LIMIT OF EXISTING PTI 10-100 AREA
- EXISTING UNDERGROUND ELECTRIC
- EXISTING OVERHEAD ELECTRIC
- EXISTING GAS LINE
- ABANDONED GAS LINE
- EXISTING FOREWATER
- PROPOSED FOREWATER
- PROPOSED FOREWATER LEAK DETECTION RISER
- FACILITY BENCHMARK LOCATION
- SURFACE WATER SHAPING LOCATION
- SURFACE WATER GAUGE
- GLAUCONITE SOIL MONITORING
- GLAUCONITE SPILL MONITORING
- BEDROCK PNEUMATIC
- BEDROCK MONITORING WELL
- BUILDING GAS MONITORING
- PERMANENT GAS MONITORING PROBE
- EXISTING GAS EXTRACTION WELL
- EXISTING LIQUIDATION WELLS CLOSURE
- PTI 10-100 AREA WITH 10% CAP
- 10% CAP VERIFICATION AREA (SEE NOTE 1)
- 20% CAP TO BE REMOVED (SEE NOTE 2)
- 20% CAP TO REMAIN (SEE NOTE 3)
- 20% CAP WITH CAP PROTECTION LAYER
- 20% CAP WITH EXPOSED BENCHMARK
- TERRACE CONTROL POINT

NOTES

1. TEST AREA WILL BE EXCAVATED TO VERIFY THAT 5-11" OF SOIL REMAINS OVER AND CAP REMAINS OVER WASTE TO MEET THE 5-11" THICKNESS SHALL MEET THE MINIMUM SPECIFICATIONS OUTLINED IN EXISTING DOCUMENTS AT THE TIME OF THE EXISTING CONSTRUCTION OF THIS CAP SYSTEM. (SEE NOTE 1)
2. THIS AREA REQUIRED REMOVAL OF THE EXISTING CAP PROTECTION LAYER, THE REMOVED EXCAVATED (5-11" LAYER REMOVED) AND REMAINS WERE RECONSTRUCTED AND RECONSTRUCTED THE TOP LIFT OF THE RECONSTRUCTED SOIL.
3. THIS AREA REQUIRED THE COMPLETION OF THE CAP PROTECTION LAYER.

REFERENCE

1. SUPERVISORY MANUAL WAS PROVIDED BY REGIONAL AGENCY, WASTING FROM AGENCY, PHOTOGRAPHY DATED AUGUST 12, 2015.
2. GROUND SURVEY DATED 10/15/15 PERFORMED BY AGENCY.

SCALE IN FEET

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.
132 E. Main Road - Pittsburgh, PA 15206
PH: 412-488-1554 - MO: 412-488-1555 - FAX: 412-488-1556
www.civilandenv.com

BOND SAFEGUARD INSURANCE COMPANY
CENTRAL WASTE DISPOSAL FACILITY ALLIANCE, OHIO

FINAL COVER SYSTEM PLAN

6

APPENDIX B

PERMITS



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install
Terms and Conditions

Issue Date: 1/18/2005
Effective Date: 1/18/2005

FINAL PERMIT TO INSTALL 02-18642

Application Number: 02-18642

Facility ID: 0250000806

Permit Fee: \$1000

Name of Facility: Central Waste, Inc

Person to Contact: Mary Blai

Address: 12003 Oyster Rd
Alliance, OH 44601

Location of proposed air contaminant source(s) [emissions unit(s)]:
12003 Oyster Rd
Alliance, Ohio

Description of proposed emissions unit(s):

Chapter 31 Modification to PTI 02-14069 to relocate waste at the landfill.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
MAHONING COUNTY
Application No: 02-18642
Fac ID: 0250000806

CERTIFIED MAIL

TOXIC REVIEW
PSD
SYNTHETIC MINOR
CEMS
MACT
NSPS
NESHAPS
NETTING
MAJOR NON-ATTAINMENT
MODELING SUBMITTED
GASOLINE DISPENSING FACILITY

DATE: 1/18/2005

Central Waste, Inc
Mary Blai
12003 Oyster Rd
Alliance, OH 44601

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: USEPA

NEDO

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January

31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, ~~or~~ where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation

of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	111.6
NMOC	800
Methane	18,607

Central Waste, Inc

PTI Application: 02-18642

Issued: 1/18/2005

Facility ID: 0250000806

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. This PTI replaces the following PTIs:

- a. PTI No. 02-14069, issued August 8, 2000;
- b. PTI No. 02-2030, issued July 31, 1985;
- c. PTI No. 02-6639, issued March 17, 1993; and
- d. PTI No. 02-12762, issued March 10, 1999.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Facility-wide unpaved Roadways and Parking Areas	OAC rule 3745-31-05(A)(3)	No visible particulate emissions except for three minutes during any 60-minute period from any unpaved roadway or parking area surface. Any unpaved roadway or parking area that is paved shall have no visible particulate emissions except for one minute during any 60-minute period. Particulate emissions shall not exceed 73.4 tons per year.
	OAC rule 3745-17-08	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a All unpaved roadways and parking areas are covered by this permit and subject to the above-mentioned requirements.
- 2.b The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the

permittee has committed to treat the unpaved roadways and parking areas with water via a spray truck at sufficient treatment frequencies to ensure compliance and to limit vehicles to a speed limit of 10 miles per hour. If watering and speed reduction are not sufficient to control emissions, Ohio EPA may require additional fugitive dust control measures. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for a paved or unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- 2.d Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface resulting from the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.e The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- 2.f There shall be no visible particulate emissions except for one minute during any 60-minute period from any paved roadway area surface where facility vehicles enter or leave the premises as a result of material dragout out.
- 2.g This facility shall, if requested by the Ohio EPA, install and employ a truck wheel water wash to be used on all vehicles prior to their departure from the premises. This request would be made if the initial control measures were insufficient to minimize or eliminate the deposit of mud and dust on public roads.
- 2.h Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- 2.i Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

II. Operational Restrictions

1. Used oil as defined by OAC rule 3745-279-01(A)(12) shall not be used as a dust suppressant.
2. Leachate shall not be used as a dust suppressant.
3. The permittee shall have posted speed limit signs identifying 10 miles per hour as the maximum on-site speed limit.

III. Monitoring and/or Recordkeeping Requirements

1. Except as otherwise provided in this section, the permittee shall perform daily inspections of the roadways and parking areas.
2. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
3. The permittee may, upon receipt of written approval from the Northeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitation for unpaved roadways and parking areas shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.
2. Compliance with the emission limitation for paved roadways and parking areas shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.
3. Emission Limitation: 73.4 tons of particulate emissions per year.

Applicable Compliance Method: Compliance shall be determined by using the equation below:

For unpaved roadways and parking areas, from AP-42, Section 13.2.2, "Unpaved Roads", version 12/03.

$$EU = \left[k * \left(\frac{s}{12} \right)^{0.7} * \left(\frac{W}{3} \right)^{0.45} \right] * \left[\frac{365 - p}{365} \right] * \left[\frac{VMT}{2000} \right] * 0.25$$

where,

EU = particulate emissions, tons per year from unpaved roadways and parking areas

k = constant, 4.9

s = silt content, 6.4%

W = mean vehicle weight, 26.6 tons

p = number of days with at least 0.01 inches of precipitation/year, 157.8 days (Youngstown)

VMT = vehicular miles traveled per year, 123,000 miles/yr (from application)

Central Waste, Inc

PTI Application: 02-18642

Issued: 1/18/2005

Facility ID: 0250000806

Emissions Unit ID: F001

2,000 = conversion factor, pounds per ton

0.25 = 75% control efficiency for watering and speed control

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F001 - Facility Roadways and Parking Areas	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Municipal Solid Waste (MSW) Landfill Operations - refuse disposal activities including dumping, spreading, compacting, covering, and gas generation.	OAC rule 3745-31-05(A)(3)	725.3 Mg (800 tons) of nonmethane organic compounds (NMOC)/year; 16,880 Mg (18,607 tons) of methane/year; 35.9 tons of fugitive particulate emissions (PE)/year; Visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average; Use of best available control measures to minimize or prevent the emission of fugitive dust; The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart WWW and OAC rule 3745-17-07(B)(1).
	40 CFR Part 60, Subpart WWW	The requirements pursuant to this rule are equivalent to those established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart AAAA	See A.I.2.h, A.III.6., and A.III.7., A.IV.6. through A.IV.8. below.
	OAC rule 3745-17-07(B)(1)	The emission limitation specified by this rule is equivalent to the emission

OAC rule 3745-17-08(B)

limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The landfill fugitive dust operations/sources that are covered by this permit and are subject to the requirements of OAC rule 3745-31-05 are listed below:
- i. waste dumping/unloading
 - ii. waste compaction
 - iii. soil excavation and handling
 - iv. covering of waste with soil
 - v. wind erosion from landfill surfaces
- 2.b The permittee shall employ best available control measures for the above-identified landfill fugitive dust operations/sources for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee maintains that the inherent moisture content of the materials involved in fugitive dust operations/sources is at a level which is more than sufficient to comply with all applicable requirements. If at any time the moisture content is not sufficient to meet the above applicable requirements, the permittee shall employ best available control measures to ensure compliance.
- 2.c The above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the fugitive dust operation/sources until further observation confirms that use of the control measure(s) is unnecessary.
- 2.d Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.e The municipal solid waste (MSW) landfill has a design capacity greater than 2.5 million megagrams and 2.5 million cubic meters. As a result, the permittee shall calculate an NMOC emission rate using the procedures specified within the Testing Requirements section of this permit. The NMOC emission rate shall be recalculated annually, except as provided in the Reporting Requirements section of this permit.

- 2.f There shall be no open burning in violation of Ohio Administrative Code chapter 3745-19 at this facility.
- 2.g Except as provided in the terms for emissions unit F004, the following asbestos requirements are to be met:
- i. The facility shall not accept for disposal any National Emission Standards for Hazardous Air Pollutants (NESHAP) regulated asbestos containing material (RACM) as defined in the NESHAP Regulation for Asbestos, 40 CFR Part 61, Subpart M, Section 141 amended November 20, 1990 or any subsequent revisions or as defined in any Environmental Protection Agency Interpretive Rules concerning the NESHAP Regulation for Asbestos. This includes: (a) friable asbestos material, (b) Category I nonfriable asbestos containing material that has become friable, (c) Category I nonfriable asbestos containing material that will be or has been subjected to sanding, grinding, cutting, or abrading, or (d) Category II nonfriable asbestos containing material that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations regulated by this subpart.
 - ii. This facility shall ensure that any asbestos containing materials shall not become friable while at the landfill. If any asbestos material arrives at or becomes friable at the landfill, this facility shall adequately wet or encapsulate it if necessary to prevent visible emissions, and shall cover it with at least six (6) inches of non-asbestos containing material before the end of the operating day.
 - iii. All terms stated in Specific Terms and Conditions B.1.a are defined in the NESHAP regulation for Asbestos, 40 CFR Part 61, Subpart M, Section 141 amended November 20, 1990 or any subsequent revisions or in any Environmental Protection Agency Interpretive ruling concerning the NESHAP for Asbestos.
- 2.h The permittee must fulfill the requirements of 40 CFR Part 60, Subpart WWW.

II. Operational Restrictions

- 1. Leachate shall not be used as a dust suppressant.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall keep readily accessible on-site, the most recent 5 years of records demonstrating the maximum design capacity, the current amount of solid waste in place, and the year-by-year waste acceptance rate. Records may be maintained off-site if they are retrievable within 4 hours. Either paper or electronic formats are acceptable.

2. Except as otherwise provided in this section, the permittee shall perform inspections of the landfill fugitive dust operations/sources in accordance with the following frequencies:

<u>landfill fugitive dust operations/sources</u>	<u>minimum inspection frequency</u>
a. waste dumping/unloading	once during each day of operation
b. waste compaction	once during each day of operation
c. soil excavation and handling	once during each day of operation
d. covering of waste with soil	once during each day of operation
e. wind erosion from landfill surfaces	once during each day of operation

3. The purpose of the inspections is to determine the need for implementing the above-mentioned control measures for particulate emissions. The inspections shall be performed during representative, normal operating conditions. No inspection shall be necessary for a landfill fugitive dust operation/source that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next inspection is within one week.
4. The permittee may, upon receipt of written approval from the Northeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
5. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) was (were) implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information required by this term shall be kept separately for each landfill fugitive dust operation/source identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

6. When the calculated NMOC emission rate is greater than 50 megagrams per year (55.1 tpy), the permittee must develop and implement a written startup, shutdown and malfunction (SSM) plan according to the provisions in 40 CFR 63.6(e)(3). A copy of the SSM plan must be

maintained on site. Failure to write, implement, or maintain a copy of the SSM plan is a deviation from the requirements of this subpart.

7. When the calculated NMOC emission rate is greater than 50 megagrams per year (55.1 tpy), if actions taken during a startup, shutdown and/or malfunction are consistent with the procedures in the SSM plan, this information shall be included in a semi-annual SSM plan report.

IV. Reporting Requirements

1. The permittee shall submit an annual NMOC emission rate report to the Northeast District Office of Ohio EPA, except as provided for below. Ohio EPA may request such additional information as may be necessary to verify the reported NMOC emission rate.
2. The NMOC emission rate report shall contain an annual or 5-year estimate of the NMOC emission rate calculated using the formulas and procedures provided pursuant to the Testing Requirements section of this permit.
3. If the estimated NMOC emission rate as reported in the annual report is less than 50 megagrams per year in each of the next 5 consecutive years, the permittee may elect to submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual report, per 40 CFR Part 60.757(b)(1)(ii). This estimate shall include the current amount of solid waste in place and the estimated waste acceptance rate for each year of the 5 years for which an NMOC emission rate is estimated. All data and calculations upon which this estimate is based shall be provided to the Northeast District Office of Ohio EPA. This estimate shall be revised at least once every 5 years. If the actual waste acceptance rate exceeds the estimated waste acceptance rate in any year reported in the 5-year estimate, a revised 5-year estimate shall be submitted to the Northeast District Office. The revised estimate shall cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated waste acceptance rate.
4. The NMOC emission rate report shall include all the data, calculations, sample reports, and measurements used to estimate the annual or 5-year emissions.
5. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

6. When the calculated NMOC emission rate is greater than 50 megagrams per year (55.1 tpy), a deviation is defined in Section 63.1990. For the purposes of the landfill monitoring and SSM plan requirements, deviations include the items in paragraphs (a) through (c) of this section.

- a. A deviation occurs when the control device operating parameter boundaries described in 40 CFR 60.758(c)(1) of Subpart WWW are exceeded.
 - b. A deviation occurs when one or more of the hours during the 3-hour block averaging period does not constitute a valid hour of data. A valid hour of data must have measured values for at least three 15-minute monitoring periods within the hour.
 - c. A deviation occurs when a SSM plan is not developed, implemented, or maintained on site.
7. When the calculated NMOC emission rate is greater than 50 megagrams per year (55.1 tpy).
- a. Keep records and reports as specified in 40 CFR Part 60, Subpart WWW, or in the Federal plan, EPA approved State plan or tribal plan that implements 40 CFR Part 60, Subpart Cc, whichever applies to your landfill, with one exception: You must submit the annual report described in 40 CFR 60.757(f) every 6 months.
 - b. You must also keep records and reports as specified in the general provisions of 40 CFR Part 60 and this part as shown in Table 1 of 40 CFR Part 63, Subpart AAAA. Applicable records in the general provisions include items such as SSM plans and the SSM plan reports.
8. When the calculated NMOC emission rate is greater than 50 megagrams per year (55.1 tpy), any time an action taken during a startup, shutdown, and/or malfunction is not consistent with the SSM plan, the source shall report actions taken within 2 working days after commencing such actions, followed by a letter 7 days after the event.

V. Testing Requirements

1. The permittee shall calculate the NMOC emission rate using either the equation provided in Section A.V.1.a or the equation provided in Section A.V.1.b. Both equations may be used if the actual year-to-year solid waste acceptance rate is known, as specified in Section A.V.1.a, for part of the life of the landfill. The values to be used in both equations are 0.05 per year for k , 170 cubic meters per megagram for L_0 , and the average C_{NMOC} from collected samples as determined by the procedures specified in Section A.V.2. For landfills located in geographical areas with a thirty year annual average precipitation of less than 63.5 cm, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year.
- a. The following equation shall be used if the actual year-to-year solid waste acceptance rate is known:

$$M_{NMOC} = \sum_{i=1}^n 2 k L_0 M_i (e^{-k t_i}) (C_{NMOC}) (3.6 \times 10^{-9})$$

where,

M_{NMOC} = Total NMOC emission rate from the landfill, megagrams per year

k = methane generation rate constant, year⁻¹

L_0 = methane generation potential, cubic meters per megagram solid waste

M_i = mass of solid waste in the i^{th} section, megagrams

t_i = age of the i^{th} section, years

C_{NMOC} = concentration of NMOC, parts per million by volume as hexane

3.6×10^{-9} = conversion factor

The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for M_i if documentation of the nature and amount of such wastes is maintained.

- b. The following equation shall be used if the actual year-to-year solid waste acceptance rate is unknown:

$$M_{\text{NMOC}} = 2L_0R(e^{-kc} - e^{-kt})C_{\text{NMOC}}(3.6 \times 10^{-9})$$

Where:

M_{NMOC} = mass emission rate of NMOC, megagrams per year

L_0 = methane generation potential, cubic meters per megagram solid waste

R = average annual acceptance rate, megagrams per year

k = methane generation rate constant, year⁻¹

t = age of landfill, years

C_{NMOC} = concentration of NMOC, parts per million by volume as hexane

c = time since closure, years; for active landfill $c=0$ and $e^{-kc}=1$

3.6×10^{-9} = conversion factor

The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value of R , if documentation of the nature and amount of such wastes is maintained.

2. The permittee shall determine the NMOC concentration using the following sampling procedure. The permittee shall install at least two sample probes per hectare of landfill surface that has retained waste for at least 2 years. If the landfill is larger than 25 hectares in area, only 50 sample probes are required. The sample probes should be located to avoid known areas of

nondegradable solid waste. The owner or operator shall collect and analyze one sample of landfill gas from each probe to determine the NMOC concentration using Method 25 or 25C of Appendix A of 40 CFR Part 60. Method 18 of Appendix A of 40 CFR Part 60 may be used to analyze the samples collected by the Method 25 or 25C sampling procedure. Taking composite samples from different probes into a single cylinder is allowed; however, equal sample volumes must be taken from each probe. For each composite, the sampling rate, collection times, beginning and ending cylinder vacuums, or alternative volume measurements must be recorded to verify that composite volumes are equal. Composite sample volumes should not be less than one liter unless evidence can be provided to substantiate the accuracy of smaller volumes. Terminate compositing before the cylinder approaches ambient pressure where measurement accuracy diminishes. If using Method 18, the permittee must identify all compounds in the sample and, at a minimum, test for those compounds published in the most recent Compilation of Air Pollutant Emission Factors (AP-42), minus carbon monoxide, hydrogen sulfide, and mercury. At a minimum, the instrument must be calibrated for each of the compounds on the list. Convert the concentration of each Method 18 compound to C_{NMOC} as hexane by multiplying by the ratio of its carbon atoms divided by six. The permittee must divide the NMOC concentration from Method 25 or 25 C of Appendix A of 40 CFR Part 60 by six to convert from C_{NMOC} as carbon to C_{NMOC} as hexane. If the landfill has an active or passive gas removal system in place, Method 25 or 25C samples may be collected from these systems instead of surface probes provided the removal system can be shown to provide sampling as representative as the two sampling probe hectare requirement. For active collection systems, samples may be collected from the common header pipe before the gas moving or condensate removal equipment. For these systems, a minimum of three samples must be collected from the header pipe.

The permittee shall retest the site-specific NMOC concentration every 5 years using the methods specified above.

3. If the resulting mass emission rate calculated using the site-specific NMOC concentration is equal to or greater than 50 megagrams per year, then the permittee shall either:
 - a. determine the site-specific methane generation rate constant and recalculate the NMOC emission rate using the site-specific methane generation rate. The site-specific methane generation rate constant shall be determined using the procedures provided in Method 2E of Appendix A in 40 CFR Part 60.

OR

- b. submit a collection and control system design plan prepared by a professional engineer to the Northeast District Office of Ohio EPA within one year in accordance with 40 CFR 60.752(b)(2); AND
 - c. install a collection and control system that captures the gas generated within the landfill, as required by 40 CFR 60.752(b)(2)(ii)(A) or (B) and (b)(2)(iii) within 30 months after the first annual report in which the emission rate equals or exceeds 50 megagrams per year; AND

- d. submit a permit-to-install (PTI) application for a modification of the MSW landfill to address new source review issues associated with the installation of the collection and control system.
4. If the resulting mass emission rate calculated using the site-specific methane generation rate and concentration of NMOC is equal to or greater than 50 megagrams per year, the permittee shall comply with either the next tier sampling, or install a gas collection and control system pursuant to the terms of this permit.
5. Compliance with the emissions limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation:

35.9 tons of fugitive PE/year

Compliance Method:

The permittee shall demonstrate compliance by use of the following equation, derived using standard AP-42 and U.S. EPA emission factors, and accounts for emissions from wind erosion, daily cover material handling and placement, solid waste handling (dumping waste), spreading, grading, and compaction of waste:

$$E(TPY) = 2.1E-4[(365-p)(f)(acres)] + 4.0E-5(AMDWR)(U/5)^{1.3} + 23.3$$

where:

p is the days with greater than 0.01" of precipitation (157.8 for Youngstown)

f is the % of time with wind speeds greater than 12 MPH (27.5 for Youngstown)

acres is the estimated maximum landfill acreage exposed at any one time

U is the mean wind speed, MPH (11.3 for Youngstown)

AMDWR is the Allowable Maximum Daily Waste Receipt

b. Emission Limitation:

725.3 Mg (800 tons) of fugitive NMOC/year

Compliance Method:

The permittee shall demonstrate compliance with the above emission limitation through the annual NMOC emission rate report required in Section A.IV.1.

c. Emission Limitation:

16,880 Mg (18,607 tons) of fugitive methane/year

Compliance Method:

The permittee shall demonstrate compliance through calculations using the Landfill Gas Emissions Model (LandGEM) version 2.01.

d. Emission Limitation:

Visible fugitive particulate emissions shall not exceed 20% opacity, as a 3-minute average.

Compliance Method:

If required, the permittee shall demonstrate compliance in accordance with 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Municipal Solid Waste (MSW) Landfill Operations	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - Soil piles - Material load in/out and wind erosion	OAC rule 3745-31-05(A)(3)	There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period. Particulate emissions shall not exceed 2.3 TPY from wind erosion and load-in and load-out operations. The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust.
	OAC rule 3745-17-07(B)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-08(B)	The control requirements specified by this rule are less stringent than the control requirements established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a All of the storage piles at this facility are covered by this permit and are subject to the requirements of OAC rule 3745-31-05.
- 2.b The permittee shall employ best available control measures for all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with

the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to process aggregate material with inherently high moisture content and to minimize drop height distance from front-end loaders to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c The above-mentioned control measures shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measure is unnecessary.
- 2.d The permittee shall employ best available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to process aggregate material with inherently high moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e The above-mentioned control measures shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of additional control measures shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

II. Operational Restrictions

- 1. Leachate shall not be used as a dust suppressant.

III. Monitoring and/or Recordkeeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile at this facility on a weekly basis.
- 2. Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile at this facility on a weekly basis.
- 3. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile at this facility on a weekly basis.

4. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
5. The purpose of the inspections is to ensure continued compliance for load-in and load-out of a storage pile and for wind erosion from the surface of a storage pile and determine the need for implementing additional control measures. The inspections shall be performed during representative, normal storage pile operating conditions.
6. The permittee may, upon receipt of written approval from the Northeast District Office of Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measure(s);
 - c. the dates the control measure(s) were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measure(s) were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit deviation (exceedance) reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations specified in section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation: There shall be no visible emissions of fugitive dust except for a period of time not to exceed one minute during any sixty-minute observation period.

Compliance with the visible emission limitations for the wind erosion and load-in and load-out operations from the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

- b. Emission Limitation:
Particulate emissions shall not exceed 2.3 TPY from wind erosion and load-in and load-out operations.

Compliance Method:

The permittee shall demonstrate compliance by adding maximum potential emissions from wind erosion and material load in/out from soil storage piles.

The potential emission rate for wind erosion is calculated as determined by the method from U.S. EPA's Control of Open Fugitive Dust Sources, Equation 4-9 (September 1988), as follows:

$$[1.9 * (s/1.5) * (365 - p)/235 * (f/15)] \text{ lb/acre/day} * 1 \text{ acre} * 365 \text{ days/yr} * \text{ton}/2,000 \text{ lb}$$

where:

s = the silt content (%) of the solid waste (assume 5%)

p = number of days with at least 0.01 inches of precipitation per year, 157.8 days (Youngstown)

f = percent of time wind is at least 12 mph, 27.5% (Youngstown)

The potential emission rate for waste handling is calculated as determined from AP-42, Chapter 13.2.4.3 (1/95), as follows:

$$E = [(0.74) * (0.0032) * (U/5)^{1.3} / (M/2)^{1.2}] \text{ lb/ton} * 158,600 \text{ tons/yr} * \text{ton}/2,000 \text{ lb} * 2$$

where:

U = mean wind speed, 11.3 MPH (Youngstown)

M = moisture content of the soil (assume 5%)

158,600 = cover soil material handled annually, from application, estimated

2 = accounts for load-in and load-out

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F003 - Soil piles - Material load in/out and wind erosion	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F005 - Relocation of previously disposed of, on-site asbestos contaminated materials (ACM), to include roadways, excavation, load-out, wind erosion, deposition, and material handling.	OAC rule 3745-31-05 (A)(3)	<p>There shall be no (zero) visible emissions from any operations involving the relocation of ACM (see terms A.I.2.b.);</p> <p>0.0 (zero) tons per year allowable PE emissions;</p> <p>Best available control measures that are sufficient to eliminate visible emissions of fugitive dust (see Sections A.I.2.b through A.I.2.e);</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07 and -08;</p> <p>Best available control measures that are sufficient to eliminate visible emissions of fugitive dust from the ACM waste relocation activities (see Sections A.I.2.e through A.I.2.i).</p> <p>The requirements of this rule also include compliance with the requirements of OAC Rules 3745-17-07 and -08, 40 CFR Part 61, Subpart M and OAC chapter 3745-20.</p>
	OAC rule 3745-17-08	The visible particulate emissions limitation specified by this rule is less stringent than the emissions limitation

	established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-07	The visible particulate emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC Rule 3745-31-05(A)(3).
40 CFR 61, subpart M	No (zero) visible emissions from all storage and material handling piles involving the relocation of ACM. No (zero) visible emissions from any landfill operation involving the relocation of ACM.
OAC chapter 3745-20	The visible particulate emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 61, Subpart M.
OAC rule 3745-20-07	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
OAC rule 3745-17-07(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR, Part 61 Subpart M.

2. Additional Terms and Conditions

- 2.a In accordance with the conditions of this permit, the permittee is authorized to relocate and redispense of ACM subject to the provisions of NESHAP, 40 CFR Part 61, Subparts A and M and the regulations adopted by Ohio EPA in Chapter 3745-20 of the Ohio Administrative Code.
- 2.b All activity involving the relocation of ACM is covered by this permit and subject to the requirements of OAC 3745-31-05(A)(3).
- 2.c The zero visible emissions limit from any operation involving the relocation of previously disposed of ACM shall apply to (but not be limited to): roadway traffic, excavating, wind erosion, material storage piles, etc. associated with the relocation of ACM.

- 2.d For the relocation of previously disposed of wastes other than ACM (eg., municipal solid waste, industrial sludge, etc.) the permittee shall comply with the allowable visible emissions limits of this permit for emissions units F001 (roadways), F002 (landfill operations), and F003 (material storage piles), as applicable.
- 2.e The permittee shall employ best available control measures during any operation involving the relocation of ACM for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to maintain an inherently high water content on all surfaces during ACM relocation at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.f The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. To assure zero visible emissions, relocation of ACM shall be suspended if unsafe or hazardous conditions would be created by continuing operations while using controls.
- 2.g The facility shall maintain a copy of the engineering drawing delineating each cell of the landfill, identified as "Figure 1 - Site Plan-Existing Limits of Waste Placement", revision 2 (June 4, 2004), or any later version approved by the Northeast District Office.
- 2.h For purposes of compliance with the terms and conditions of this permit, the permittee shall handle each cell identified as containing ACM on "Figure 1 - Site Plan-Existing Limits of Waste Placement", revision 2 (June 4, 2004) and each contiguous cell as containing ACM.
- 2.i Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.

B. Operational Restrictions

- 1. The permittee shall implement and maintain an "Asbestos Disposal Operating Procedure and Spill Contingency Plan" (Plan) consisting of authorized personnel training, inspection and disposal operating procedures, non-conforming waste response procedures, inventory and maintenance procedures for safety and emission control equipment, record keeping procedures and emergency notification procedures. The permittee shall be knowledgeable in the procedures and the Plan shall be available for inspection at this facility at all times until relocation activities are completed.
- 2. The permittee shall comply with the Waste Relocation Plan prepared by the permittee's consultant. The final version of this plan shall be the version submitted on June 25, 2004, or a later version that is mutually acceptable to the permittee, Ohio EPA, and the Mahoning-Trumbull Air Pollution Control Agency.

3. The permittee shall have emission control equipment available for wetting and containing asbestos in the event of a release of known ACM from an identified cell or a suspect cell that contains ACM not previously disclosed. All equipment required to implement the Plan shall be maintained in accordance with good engineering practices to ensure equipment is in a ready to use condition, and in an appropriate location for use.
4. For the purpose of containing asbestos contamination to the extent possible, the facility shall establish a support, contamination reduction, and exclusion zone around each contaminated cell. Each zone shall be clearly delineated prior to relocating any ACM such that all personnel and visitors may clearly recognize where each zone begins and ends. The function of each zone shall be as follows:
 - a. Support zone - employee parking of personally owned vehicles, visitor check-in, etc.
 - b. Contamination reduction zone - where all decontamination of personnel and equipment shall take place, etc.
 - c. Exclusion zone - the area within which heavy equipment may be freely operated in the process of excavating ACM from the piles for transfer to the active cell, etc.
5. Equipment used for the movement of ACM cells shall be decontaminated prior to any travel outside the exclusion zone.
6. All equipment used in any manner to relocate ACM or any contiguous cell shall first be decontaminated before proceeding to work on other landfill projects.
7. If open-bodied vehicles used to relocate ACM are demonstrated to have visible emissions, Ohio EPA will require vehicles transporting ACM be adequately covered to prohibit visible emissions.
8. Used oil as defined by OAC rule 3745-279-01(A)(12) shall not be used as a dust suppressant.
9. Leachate shall not be used as a dust suppressant.
10. The facility shall comply with the requirements of 40 CFR Part 61, Subpart M, Section 154 and OAC rule 3745-20-06 (Standard for active waste disposal sites). The facility shall submit a proposal 30 days prior to beginning remediation activities outlining operations of the active disposal site with respect to meeting the requirements of the above stated rules.
11. The facility shall comply with the requirements of 40 CFR Part 61, Subpart 151 and OAC rule 3745-20-07 (Standard for inactive asbestos waste disposal sites). The facility shall submit a proposal 30 days prior to the beginning of remediation activities outlining operations of the inactive disposal site with respect to meeting the requirements of the above stated rules.
12. Deposition and burial operations shall be conducted in a careful manner that prevents handling by equipment or persons that causes ACM to be broken up or dispersed before the materials are buried.

D. Reporting Requirements

1. The permittee shall submit deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency;
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented;
 - c. any instance where visible emissions are observed when handling ACM; and
 - d. the date each landfill cell first began to be relocated and the completion date.
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. Notify Ohio EPA, Northeast District Office in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided at least 10 working days before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice:
 - a. Scheduled starting and completion dates.
 - b. Reason for disturbing the waste.
 - c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the director may require changes in the emission control procedures to be used.
 - d. Location of any temporary storage site and the final disposal site.
4. The permittee shall submit to Ohio EPA, Northeast District Office, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities.
5. Within 60 days of the facility becoming inactive and after the effective day of this subpart, record, in accordance with State law, a notation on the deed to the facility and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that:
 - a. the land has been used for the disposal of asbestos-containing waste material;

- b. the survey plot and record of the location and quantity of asbestos-containing waste disposed of within the disposal site required in Sec. 61.154(f) have been filed with the Administrator of U.S. EPA (a copy shall be sent to Ohio EPA Northeast District Office); and
 - c. the entire premises is subject to 40 CFR Part 63, Subpart M.
- 6. The deed restriction shall be recorded in the same manner as the deed for the property.
 - 7. The deed restriction shall be a permanent part of the property description, and must remain within the deed with any and all property transfers.
 - 8. The following language has been reviewed and approved for use as appropriate in the deed:

The Grantor, _____, hereby provides public notice about [description of property] ("the Premises") as follows:

- a. The Premises has been used as an active asbestos waste disposal site, and the use of an active asbestos waste disposal site as such is restricted under OAC 3745-20-06, OAC 3745-20-08, 40 CFR 61.154. Pursuant to OAC 3745-20-01(A)(17), the active asbestos waste disposal site will become an inactive waste disposal site when no additional asbestos-containing waste material has been deposited for one year and where the surface is not disturbed by vehicular traffic. Once the active asbestos waste disposal site becomes an inactive waste disposal site, its use will be restricted by OAC 3745-20-07, and 40 CFR 61.151. Pursuant to 40 CFR 61.151(e), within 60 days of the active asbestos waste disposal site becoming inactive, the Grantor shall record, in accordance with State law, a notation on the deed to the facility property and on any other instrument that would normally be examined during a title search; this notation will in perpetuity notify any potential purchaser of the property that: 1) the land has been used for the disposal of solid waste in the form of asbestos-containing material; 2) the survey plot and record of the location and quantity of asbestos-containing waste disposed of within the disposal site required in 40 CFR 61.154(f) have been filed with the Administrator of U.S. EPA and Ohio EPA district office; and 3) the site is subject to 40 CFR part 61 subpart M.
- b. The Premises may be used for any other lawful uses or purposes that are not inconsistent with this Deed Notice. Pursuant to OAC 3745-20-07(D), once the active asbestos waste disposal site becomes inactive, the owner or operator of the Premises shall notify the director in writing prior to disturbing or removing any asbestos-containing waste material. The notice shall contain the reason for disturbing the waste, the procedures to be used to control emissions, the duration of the operation and the location of the final disposal site. Additionally, under 40 CFR 61.151(d), the director must be notified at least 45 days in accordance with this rule, prior to any excavating that would disturb the asbestos containing material.

E. Testing Requirements

1. Compliance with the zero visible emission limitation for the landfill surfaces shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources") and the use of visible emission monitors.
2. Compliance with the 0.0 (zero) tons per year allowable PE emissions from operations associated with this emissions unit shall be determined from compliance with the visible emissions limitation.

F. Miscellaneous Requirements

1. Pursuant to the authority in OAC rule 3745-77-07(C)(2) or ORC section 3704.03(L), any representative of the director may, upon presentation of proper identification, enter at any reasonable time upon any portion of the property where this landfill is located, including any improvements thereon, to make inspections, take samples, conduct tests and examine records or reports pertaining to any emissions of air contaminants and any monitoring equipment, emissions control equipment or methods. No operator or agent of this landfill shall act in any manner to refuse, hinder, or thwart this legal right of entry.
2. All actions required to be taken pursuant to this permit shall be undertaken in accordance with the requirements of all applicable federal, state, and local laws and regulations, including but not limited to, all applicable permits for activities required by this permit.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F005 - Relocation of previously disposed of, on-site asbestos contaminated materials (ACM), to include roadways, excavation, load-out, wind erosion, deposition, and material handling.	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T003 - 200,000 Gallon Above-Ground Leachate Storage Tank	OAC rule 3745-31-05(A)(3) 40 CFR 60, Subpart Kb	Organic compound emissions shall not exceed 0.6 tons per year. The tank shall be equipped with submerged fill. Recordkeeping - see III.2 below.

2. Additional Terms and Conditions

- 2.a The tank shall be equipped with submerged fill.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the quantity (in gallons) of leachate stored in the tank. Records retention shall comply with Part I, A.3. of this permit.

2. NSPS Requirements

The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

In accordance with 40 CFR 60.116b (a) and (b), the owner and operator of the leachate storage tank (T003) shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the life of the source.

Central Waste, Inc
PTI Application: 02-18642
Issued: 1/18/2005

Facility ID: 0250000806
Emissions Unit ID: T003

IV. Reporting Requirements

None

V. Testing Requirements

Emission Limitation:
0.6 tons per year of OC emissions

Applicable Compliance Method:

To demonstrate compliance with the annual limit of 0.6 ton per year of OC emissions, the permittee shall calculate the annual OC emissions in ton per year using AP-42, Section 7.1.3 (September, 1997 version), by using the latest version of U.S. EPA's TANKS software (currently TANKS 4.0).

VI. Miscellaneous Requirements

None

Central Waste, Inc

PTI Application: 02-18642

Issued: 1/18/2005

Facility ID: 0250000806

Emissions Unit ID: T003

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
T003 - 200,000 Gallon Above-Ground Leachate Storage Tank	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

TO BE SUBMITTED UPON COMPLETION OF CONSTRUCTION AND PRIOR TO START-UP

INSTALLATION CERTIFICATE FOR EMISSIONS UNIT F001

This installation certificate is required to be completed in association with the terms and conditions of permit to install 02-18642 issued on 1/18/2005 to:

Central Waste, Inc

Mary Blai

12003 Oyster Rd

Alliance, OH 44601

**FOR THE
FACILITY
LOCATED AT**

12003 Oyster Rd, Alliance Ohio

FACILITY ID: 0250000806

CORE ID: 28809

for emissions unit F001 (Facility Roadways and Parking Areas).

THE FOLLOWING IS TO BE COMPLETED BY THE APPLICANT

DATE OF COMPLETION OF CONSTRUCTION / / mm/dd/yyyy (REQUIRED)

OR

DATE OF COMPLETION OF MODIFICATION AS
DEFINED IN OAC RULE 3745-31-01 / / mm/dd/yyyy (REQUIRED)

Please note: If installation was prior to receiving the PTI, an estimated date is acceptable, but you must include the month, day and year.

This signature shall constitute affirmation that the source identified above has been constructed in accordance with the terms and conditions in the Permit To Install and with all other applicable Ohio EPA requirements.

Authorized Signature (for facility)

Date

Name (please print)

Title

Address

City

State

Zip

This Certification should be mailed to:
Ohio EPA Division of Air Pollution Control
Permit Management Unit
P.O. Box 1049
Columbus, OH 43216-1049

****See reverse side for important survey questionnaire**

PMU Use Only

Completed By

Date

TO BE SUBMITTED UPON COMPLETION OF CONSTRUCTION AND PRIOR TO START-UP

INSTALLATION CERTIFICATE FOR EMISSIONS UNIT F002

This installation certificate is required to be completed in association with the terms and conditions of permit to install 02-18642 issued on 1/18/2005 to:

Central Waste, Inc

Mary Blai

12003 Oyster Rd

Alliance, OH 44601

**FOR THE
FACILITY
LOCATED AT**

12003 Oyster Rd, Alliance Ohio

FACILITY ID: 0250000806

CORE ID: 28809

for emissions unit F002 (Municipal Solid Waste (MSW) Landfill Operations).

THE FOLLOWING IS TO BE COMPLETED BY THE APPLICANT

DATE OF COMPLETION OF CONSTRUCTION / / mm/dd/yyyy (REQUIRED)

OR

DATE OF COMPLETION OF MODIFICATION AS
DEFINED IN OAC RULE 3745-31-01 / / mm/dd/yyyy (REQUIRED)

Please note: If installation was prior to receiving the PTI, an estimated date is acceptable, but you must include the month, day and year.

This signature shall constitute affirmation that the source identified above has been constructed in accordance with the terms and conditions in the Permit To Install and with all other applicable Ohio EPA requirements.

Authorized Signature (for facility)

Date

Name (please print)

Title

Address

City

State

Zip

This Certification should be mailed to:
Ohio EPA Division of Air Pollution Control
Permit Management Unit

P.O. Box 1049
Columbus, OH 43216-1049

****See reverse side for important survey questionnaire**

PMU Use Only

Completed By

Date

TO BE SUBMITTED UPON COMPLETION OF CONSTRUCTION AND PRIOR TO START-UP

INSTALLATION CERTIFICATE FOR EMISSIONS UNIT F003

This installation certificate is required to be completed in association with the terms and conditions of permit to install 02-18642 issued on 1/18/2005 to:

Central Waste, Inc

Mary Blai

12003 Oyster Rd

Alliance, OH 44601

**FOR THE
FACILITY
LOCATED AT**

12003 Oyster Rd, Alliance Ohio

FACILITY ID: 0250000806

CORE ID: 28809

for emissions unit F003 (Soil and Aggregate Storage Piles).

THE FOLLOWING IS TO BE COMPLETED BY THE APPLICANT

DATE OF COMPLETION OF CONSTRUCTION / / mm/dd/yyyy (REQUIRED)

OR

DATE OF COMPLETION OF MODIFICATION AS
DEFINED IN OAC RULE 3745-31-01 / / mm/dd/yyyy (REQUIRED)

Please note: If installation was prior to receiving the PTI, an estimated date is acceptable, but you must include the month, day and year.

This signature shall constitute affirmation that the source identified above has been constructed in accordance with the terms and conditions in the Permit To Install and with all other applicable Ohio EPA requirements.

Authorized Signature (for facility)

Date

Name (please print)

Title

Address

City

State

Zip

This Certification should be mailed to:
Ohio EPA Division of Air Pollution Control
Permit Management Unit
P.O. Box 1049
Columbus, OH 43216-1049

****See reverse side for important survey questionnaire**

PMU Use Only

Completed By

Date

..TO BE SUBMITTED UPON COMPLETION OF CONSTRUCTION AND PRIOR TO START-UP

INSTALLATION CERTIFICATE FOR EMISSIONS UNIT F005

This installation certificate is required to be completed in association with the terms and conditions of permit to install 02-18642 issued on 1/18/2005 to:

Central Waste, Inc

Mary Blai

12003 Oyster Rd

Alliance, OH 44601

**FOR THE
FACILITY
LOCATED AT**

12003 Oyster Rd, Alliance Ohio

FACILITY ID: 0250000806

CORE ID: 28809

for emissions unit F005 (Waste Relocation Project, to Include Asbestos Waste Handling.).

THE FOLLOWING IS TO BE COMPLETED BY THE APPLICANT

DATE OF COMPLETION OF CONSTRUCTION / / mm/dd/yyyy (REQUIRED)

OR

DATE OF COMPLETION OF MODIFICATION AS
DEFINED IN OAC RULE 3745-31-01 / / mm/dd/yyyy (REQUIRED)

Please note: If installation was prior to receiving the PTI, an estimated date is acceptable, but you must include the month, day and year.

This signature shall constitute affirmation that the source identified above has been constructed in accordance with the terms and conditions in the Permit To Install and with all other applicable Ohio EPA requirements.

Authorized Signature (for facility)

Date

Name (please print)

Title

Address

City

State

Zip

This Certification should be mailed to:
Ohio EPA Division of Air Pollution Control
Permit Management Unit
P.O. Box 1049
Columbus, OH 43216-1049

****See reverse side for important survey questionnaire**

PMU Use Only

Completed By

Date

TO BE SUBMITTED UPON COMPLETION OF CONSTRUCTION AND PRIOR TO START-UP

INSTALLATION CERTIFICATE FOR EMISSIONS UNIT T003

This installation certificate is required to be completed in association with the terms and conditions of permit to install 02-18642 issued on 1/18/2005 to:

Central Waste, Inc

Mary Blai

12003 Oyster Rd

Alliance, OH 44601

**FOR THE
FACILITY
LOCATED AT**

12003 Oyster Rd, Alliance Ohio

FACILITY ID: 0250000806

CORE ID: 28809

for emissions unit T003 (200,000 Gallon Above-Ground Leachate Storage Tank).

THE FOLLOWING IS TO BE COMPLETED BY THE APPLICANT

DATE OF COMPLETION OF CONSTRUCTION / / mm/dd/yyyy (REQUIRED)

OR

DATE OF COMPLETION OF MODIFICATION AS
DEFINED IN OAC RULE 3745-31-01 / / mm/dd/yyyy (REQUIRED)

Please note: If installation was prior to receiving the PTI, an estimated date is acceptable, but you must include the month, day and year.

This signature shall constitute affirmation that the source identified above has been constructed in accordance with the terms and conditions in the Permit To Install and with all other applicable Ohio EPA requirements.

Authorized Signature (for facility)

Date

Name (please print)

Title

Address

City

State

Zip

This Certification should be mailed to:
Ohio EPA Division of Air Pollution Control
Permit Management Unit

P.O. Box 1049

Columbus, OH 43216-1049

****See reverse side for important survey questionnaire**

PMU Use Only

Completed By

Date



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

March 1, 2005

CERTIFIED MAIL

Central Waste, Inc.
12003 Oyster Road
Alliance, OH 44601

RE: Central Waste Landfill
Permit to Install: Vertical & Lateral Expansion
Application No: 02-14224

Dear Sir or Madam:

The Ohio Environmental Protection Agency, pursuant to Ohio Revised Code Chapter 3745-31 and the rules adopted thereunder, has reviewed the application for a permit with accompanying detail plans, specifications and/or information (hereinafter referred to as "application") regarding the above-referenced facility. This application has been approved by the Director subject to the conditions of compliance contained in the permit approval enclosed herewith and with all applicable laws, rules and standards. All construction must be supervised by an engineer or expert qualified in such work. Because the permit approval contains conditions of compliance, I urge you to read it carefully.

You are requested to submit within thirty (30) days of the date of issuance of this Permit to Install, the required permit fee balance of sixty one thousand, eight hundred ten dollars and forty cents (\$62,210.40 - \$400.00 application fee = \$61,810.40), payable to **Treasurer, State of Ohio**. Please send the required payments to:

Ohio Environmental Protection Agency
Permit to Install Fee
Dept L-2711
Columbus, OH 43260-2711

Payment of the \$61,810.40 fee within 30 days is a condition of your Permit to Install. Failure to timely submit the required permit fee will result in an assessment of late penalties in accordance with ORC Sections 3745.11 (Q) and (V).

Bob Taft, Governor
Bruce Johnson, Lieutenant Governor
Joseph P. Koncinski, Director

Ohio EPA is an Equal Opportunity Employer



Printed on Recycled Paper

**OHIO ENVIRONMENTAL PROTECTION AGENCY
PERMIT-TO-INSTALL**

Application Number: PTI Number 02-14224
Application Received: July 27, 2000
Permit Fee: \$62,210.40
Permit Fee Balance: \$61,810.40

Applicant: Central Waste, Inc.
Address: 12003 Oyster Road
City, State, Zip: Alliance, Ohio 44601

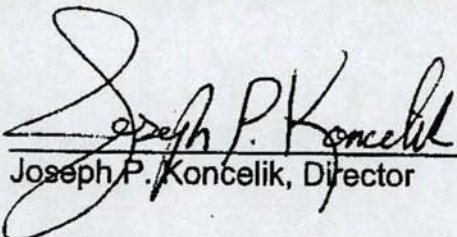
Name: Central Waste Landfill
Location: 12003 Oyster Road, Smith Township, Mahoning County, Ohio
PTI: Vertical and Lateral Expansion

Issuance Date: MAR 1 2005

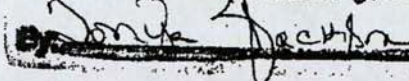
Effective Date: MAR 1 2005

The above named entity is hereby issued a permit approval (permit-to-install) for the above described source pursuant to Ohio Administrative Code (OAC) Rule 3745-27-02. Issuance of this permit approval does not constitute expressed or implied approval or agreement that, if constructed and/or modified in accordance with the plans, specifications, and/or information accompanying the permit application, the above described source of environmental pollutants will operate in compliance with applicable state and federal laws, rules, and regulations, and does not constitute expressed or implied assurances that, if constructed and/or modified in accordance with those plans, specifications, and/or information accompanying the permit application, the above described source of environmental pollutants will be granted the necessary operating permits and/or licenses. This permit approval is issued subject to the attached conditions which are hereby incorporated and made a part hereof.

Ohio Environmental Protection Agency


Joseph P. Koncelik, Director

I certify this to be a true and accurate copy of the
official document as filed in the records of the Ohio
Environmental Protection Agency.

 Date 3-1-05

OHIO E.P.A.
MAR - 1 2005
ENTERED DIRECTOR'S JOURNAL

PERMIT SUMMARY

This permit approval (PTI Number 02-14224) authorizes the vertical and lateral expansion of the approved limits of waste placement at the existing Central Waste Landfill (Facility) located at 12003 Oyster Road, Smith Township, Mahoning County, Ohio. Central Waste, Inc. (CWI) is both the owner and operator of the Facility.

The Facility currently consists of a single operating unit, comprising approximately 18.8 acres of waste placement, and two (2) capped, inactive non-contiguous units totaling 26 acres and 5.4 acres, respectively. This permit approval authorizes CWI to construct a landfill expansion approximately 42.0 acres in size, comprised of 37.9 acres of new disposal cells developed contiguous and north of the current operation and 4.1 acres vertically expanding above currently permitted Phase 2B. Total expansion volume is approximately 6,221,040 cubic yards (CY).

This permit approval also authorizes CWI to relocate approximately 253,700 CY of waste from a capped, inactive, unlined industrial sludge unit and 152,000 CY of waste from a capped, inactive, unlined MSW unit to lined disposal areas. In addition, this permit approval increases the Facility's authorized maximum daily waste receipt (AMDWR) from 3,000 tons to 5,000 tons. Based on the facility volume and AMDWR, the anticipated life of the Facility is about 3.1 years.

Finally, this permit approval allows CWI to make improvements to the Facility, including its surface water management system, leachate collection system, explosive gas extraction system, and explosive gas monitoring system. Specifically, the landfill will incorporate into its construction such features as a composite (clay/geosynthetic membrane) liner system, a leachate collection and management system, a groundwater monitoring system, an explosive gas extraction system, a final closure cap system, and 30 years of post-closure care. Furthermore, waste will be relocated from the two capped, inactive, unlined units and placed within the lined facility.

The Facility expansion will be located in an area where underlying mine spoil is classified by Ohio EPA as an uppermost aquifer system (UAS). CWI has demonstrated that this UAS is contained within the Facility boundary and that the UAS discharges solely to surface water capable of being monitored. Therefore, this permit also approves an exemption, pursuant to Ohio Revised Code (ORC) Section 3734.02(G), from the siting criterion in OAC Rule 3745-27-07(H)(2)(e), which requires that the isolation distance between the uppermost aquifer system and the bottom of the recompacted soil liner of a sanitary landfill facility be not less than fifteen (15) feet (see section titled "Exemption from Siting Criteria"). In addition to monitoring the mine spoil aquifer system, CWI will monitor a second aquifer system located in the bedrock beneath the mine spoil and a significant zone of saturation adjacent to the mine spoil.

This summary is provided solely for informational purposes and does not constitute a part of, or otherwise affect, the attached permit-to-install.

PERMIT CONDITIONS

1. The director, or an authorized representative, may enter upon the premises of the above named applicant (permittee) at any reasonable time during construction and operation for the purpose of making inspections, conducting tests, or examining records or reports pertaining to the construction, modification, or installation of the above-described source of environmental pollutants (municipal solid waste disposal facility).
2. The proposed facility shall be constructed in strict accordance with the plans, specifications, and information submitted as a part of the application for this permit approval. There may be no deviation from the approved plans without the express, written approval of the Ohio Environmental Protection Agency (Ohio EPA). Any deviation from the approved plans or the permit conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facility will operate in compliance with all Ohio laws and regulations. Additional landfill components shall be installed upon orders of Ohio EPA if the proposed municipal solid waste disposal facility is inadequate or cannot meet applicable standards.
3. Issuance of this permit approval does not relieve the permittee of the duty to comply with all applicable federal, state, and local laws, ordinances, and regulations.
4. This permit approval shall apply only to those facilities shown on the plans submitted as part of PTI Application Number 02-14224, as received on July 27, 2000, with subsequent revisions received on March 7, 2002; March 21, 2002; April 18, 2002; December 30, 2002; January 10, 2003; November 7, 2003; November 17, 2003; November 25, 2003; April 5, 2004; April 9, 2004; April 14, 2004; April 28, 2004; May 13, 2004; June 14, 2004; June 21, 2004; June 28, 2004; July 2, 2004; July 20, 2004; July 23, 2004; August 11, 2004; August 24, 2004; and December 7, 2004.
5. The Facility's AMDWR shall be 5,000 tons.
6. This permit approval may be modified, or alternatively revoked and reissued, to comply with any revisions to OAC Chapter 3745-27 applicable to this municipal solid waste disposal facility.

7. The permittee shall provide for the proper maintenance and operation of the municipal solid waste disposal facility in accordance with the provisions of OAC Chapter 3745-27.
8. Nothing in this permit approval shall be construed to authorize any waiver from the requirements of any other applicable federal or state laws or regulations except as specified herein. This permit approval shall not be interpreted to release the permittee from responsibility under ORC Chapters 3704, 3714, 3734, or 6111; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants to the environment.
9. Ohio EPA, Northeast District Office (NEDO) and the Mahoning County General Health District shall receive written notification of the construction start date no later than seven (7) days prior to starting any construction authorized under this permit approval, so that construction of the Facility can be routinely inspected by Ohio EPA, NEDO and the Mahoning County General Health District before being placed into operation.
10. This permit approval does not authorize the acceptance of any hazardous or infectious wastes, except for those excluded from hazardous or infectious waste regulation by ORC Chapter 3734.
11. This permit approval does not authorize the acceptance of any asbestos or asbestos-containing waste material that is subject to the provisions of NESHAP, 40 CFR Part 61, Subpart M. No such asbestos or asbestos-containing waste material may be accepted without first obtaining the necessary permits from Ohio EPA.
12. The permittee shall perform the following activities during construction and operation of the Facility in accordance with the cited provisions of OAC Chapter 3745-27 as follows:
 - a. The test pad required by OAC Rule 3745-27-08(E) shall be constructed, and a report containing the test results shall be submitted to Ohio EPA, NEDO no later than fourteen (14) days prior to the initial construction date of the landfill component that the test pad models.
 - b. The pre-construction tests required by OAC Rule 3745-27-08(D) shall be performed, and the test results shall be submitted to Ohio EPA, NEDO no later than seven (7) days prior to the intended use of the materials in construction.

- c. The pre-construction interface tests required by OAC Rule 3745-27-08(G) shall be performed, and the test results shall be submitted to Ohio EPA, NEDO no later than seven (7) days prior to the use of each geosynthetic material authorized by this permit approval.
 - d. The construction certification report required by OAC Rule 3745-27-08(H) shall be submitted to Ohio EPA, NEDO no later than 45 days prior to the anticipated date of waste receipt. Pursuant to OAC Rule 3745-27-19(C)(1), the permittee shall not accept waste in a phase until Ohio EPA, NEDO provides written concurrence of the construction certification report for that phase.
- 13. The permittee shall provide for the following inspections and facility maintenance:
 - a. The permittee shall provide for daily inspection of the disposal facility and completion of the daily inspection checklist and the Municipal Solid Waste Disposal Facility Daily Log of Operations, Form 3. Written results of the inspections, including any corrective measures employed, shall be made available to Ohio EPA, NEDO and the Mahoning County General Health District upon request.
 - b. Surface water control structures, including sedimentation ponds, sedimentation pond discharge structures, pipes, ditches, and culverts, shall be inspected at least monthly for erosion, clogging, or failure, and prompt corrective action shall be taken, if necessary. Written results of the inspections, including a discussion of any corrective actions taken, any water quality samples taken, the date, and weather conditions, shall be recorded on the required daily log forms. The information shall be maintained on site and submitted to Ohio EPA, NEDO and the Mahoning County General Health District upon request.
 - c. To ensure proper operation of sedimentation ponds, the ponds shall be cleaned out completely every year or when the volume of settled particles necessitates cleaning based either on inspection results or to maintain the storage volume required by OAC Rule 3745-27-08(D)(3).
- 14. Prior to waste acceptance in any disposal area newly authorized by this permit approval, the permittee shall execute and fund a financial assurance instrument meeting the requirements of OAC Rules 3745-27-15, 3745-27-16, and 3745-27-17.

15. Ohio EPA, NEDO and the Mahoning County General Health District shall receive written notice of the anticipated start date for waste relocation activities no later than seven (7) days prior to relocating any existing waste to each of the Facility's phases authorized under this permit approval, so that the waste relocation activities can be routinely inspected by Ohio EPA, NEDO and the Mahoning County General Health District.
16. The permittee shall continue to implement the ground water monitoring program for the existing ground water monitoring system in accordance with OAC Rule 3745-27-10, while the permittee implements changes to the ground water monitoring system contained in the permit-to-install and required by Condition Number 17. Implementation is defined as the collection of ground water samples from the ground water monitoring system.
17. Not later than ninety (90) days after the effective date of this permit, the permittee shall install all proposed and replacement monitoring wells and piezometers, as detailed in the permit, in accordance with OAC Rule 3745-27-10(B).
18. Not later than one (1) year after the date of installation of all proposed and replacement monitoring wells, the permittee shall sample and statistically analyze the ground water data from these wells in accordance with OAC Rules 3745-27-10(C) and (D).
19. After initial sampling has been conducted for all proposed new and replacement monitoring wells, the permittee shall continue to implement the ground water monitoring program specified in the permit in accordance with OAC Rule 3745-27-10.
20. The permittee shall not change the location of, or add any new, Facility components without prior authorization from Ohio EPA. Any such authorization request shall include plan drawing cross-sections showing the location of the uppermost aquifer system(s).
21. In the event that downgradient monitoring wells within the mine spoil UAS trigger into assessment monitoring pursuant to OAC Rule 3745-27-10(E), the permittee shall incorporate monitoring of the surface waters to which the mine spoil UAS discharges into the ground water assessment monitoring plan.
22. CWI shall submit a bird hazard mitigation plan that satisfies the requirements of OAC Rule 3745-27-20(C)(1) to Ohio EPA, NEDO for review and approval. The plan shall be submitted to Ohio EPA no later than thirty (30) days prior to the anticipated date of waste acceptance into any unit authorized under this permit approval.

23. Pursuant to ORC Sections 3745.11(Q) and (V), payment of the solid waste permit-to-install fee balance, in the amount of sixty-one thousand, eight hundred ten dollars and forty cents (\$61,810.40) payable to "Treasurer, State of Ohio," shall be submitted to Ohio EPA, Attn: Fiscal Administration, P.O. Box 1049, Columbus, Ohio, 43216-1049. The fee balance shall be submitted within thirty (30) days of the effective date of this permit approval. Failure to timely submit the required permit fee balance will result in assessment of late penalties in accordance with the aforementioned sections.

END OF CONDITIONS

EXEMPTION FROM SITING CRITERION

The permittee has requested an exemption from OAC Rule 3745-27-07(H)(2)(e), which states:

"The isolation distance between the uppermost aquifer system and the bottom of the recompacted soil liner of a sanitary landfill facility is not less than fifteen feet of in-situ or added geologic material constructed in accordance with OAC Rule 3745-27-08."

Specifically, the Facility expansion will be located in an area where underlying mine spoil is classified by Ohio EPA as the uppermost aquifer system (UAS) and will include construction of the bottom of the recompacted soil liner within fifteen (15) feet of the designated UAS. No added geologic material constructed pursuant to OAC Rule 3745-27-08 is proposed between the bottom of the recompacted soil liner and the designated UAS.

CWI has demonstrated that this UAS is contained within the Facility boundary and that it discharges solely to surface waters capable of being monitored. In addition to monitoring the mine spoil aquifer system, CWI will monitor a second aquifer system located in the bedrock beneath the mine spoil and a significant zone of saturation adjacent to the mine spoil.

Pursuant to ORC Section 3734.02(G) and OAC Rule 3745-27-03, the director may, by order, exempt any person generating, collecting, storing, treating, disposing of, or transporting solid wastes, or processing solid wastes that consist of scrap tires, in such quantities or under such circumstances that, in the determination of the director, are unlikely to adversely affect the public health or safety or the environment, from any requirement to obtain a registration certificate or license or comply with other requirements of ORC Chapter 3734.

Because CWI has demonstrated that the UAS is contained within the Facility boundary and discharges solely to surface waters capable of being monitored, and because the permittee will monitor hydrogeologic units adjacent to, beneath, and within the UAS, granting an exemption from OAC Rule 3745-27-07(H)(2)(e) is unlikely to adversely affect the public health or safety or the environment. Therefore, pursuant to ORC Section 3734.02(G) and OAC Rule 3745-27-03(B), the permittee is hereby exempted from OAC Rule 3745-27-07(H)(2)(e), which requires that the isolation distance between the UAS and the bottom of the recompacted soil liner is not less than fifteen (15) feet of in-situ or added geologic material constructed in accordance with OAC Rule 3745-27-08.

Response to Comments Received for PTI Application Number 02-11359 for the Central Waste Landfill Located in Mahoning County

On October 8, 2004, Ohio EPA issued a draft permit to install (PTI) to Central Waste, Inc. (CWI) for the proposed vertical and lateral expansion of the Central Waste Landfill located at 12003 Oyster Road, Smith Township, Mahoning County. A public hearing was held on December 1, 2004, and written comments on the draft PTI were accepted until December 8, 2004.

The following are responses to questions and comments received during the hearing and comment period pertinent to the proposed expansion. Comments received are in bold print, followed by Ohio EPA's responses.

- 1. Comment: There was little notice about the public hearing; objections were raised about the lack of individual notification of tonight's hearings when previous lists have been maintained regarding this facility.**

As required by law, public notices must appear in each newspaper of general circulation published in the county where the facility is or is proposed to be located. When the draft permit was issued in October 2004, public notices appeared in all general circulation newspapers in Mahoning County. Specifically, the public notices were published in *The Daily Legal News*, *The Vindicator*, *The Boardman News*, *The Journal*, and *Buckeye Review*. In addition, on November 29, 2004, Ohio EPA issued a news release to the local media announcing the December 1st public hearing.

Even though not required, Ohio EPA also sends out notices of public meetings to those parties who have recently shown an interest in the facility. Ohio EPA bases this additional individual notification upon past attendance of public meetings and media interest associated with the permit application. There was little public attendance at both the applicant's meeting held on September 5, 2000, at the Smith Township Offices and the information session on November 19, 2001, at Sebring-McKinley High School. Therefore, no individual notification was sent.

- 2. There was an agreement reached with CWI around February 9, 2004, which required CWI to establish a financial assurance fund by October 11, 2004. That was not done.**

On January 16, 2004, Ohio EPA and CWI entered into a consent agreement (Director's Final Findings and Orders) requiring CWI to fund and execute the required financial assurance instrument for closure and post-closure care of the landfill no later than October 11, 2004. In September 2004, CWI requested an extension to the deadline established by the January 16, 2004, Orders. On October 12, 2004, Ohio EPA issued additional Director's Final Findings and Orders, requiring CWI to fund and execute the required financial assurance instrument for closure and post-closure care of the landfill no later than June 30, 2005. As long as the

facility owner or operator has entered into a legally enforceable compliance schedule, the facility owner or operator is in substantial compliance for purposes of issuing a permit.

3. **The Alliance-Barber Airport is a privately owned public use Class III Ohio Airport that is located within 10,000 feet, and the expansion will place it within 5,000 feet of the landfill.**

There are two separate facilities that are owned by CWI, one known as the "Old Central Waste Landfill," which operated from the 1960s until 1979 and is now closed, and the other known as the "New Central Waste Landfill," which commenced operations in 1982 and is currently operating. The vertical and lateral expansion will expand over existing units within the "New Central Waste Landfill" only. The Alliance-Barber Airport is located approximately 9,800 feet northeast of the limits of waste placement associated with the "New Central Waste Landfill".

OAC Rules 3745-27-20(A)(3)(a) and 3745-27-20(C)(1) require that the limits of solid waste not be located within 10,000 feet of any airport runway end used by turbojet aircraft or within 5,000 feet of any airport runway end used by only piston-type aircraft, unless the owner or operator can demonstrate that the sanitary landfill facility will be so designed and operated that the sanitary landfill facility will not pose a "bird hazard" to aircraft as that term is defined by OAC 3745-27-01. The permit application contains documentation that the Alliance-Barber Airport is classified by both the Federal Aviation Administration (FAA) and the Ohio Department of Transportation (ODOT), Office of Aviation as an airport serving piston-type aircraft.

On December 2, 2004, Ohio EPA contacted the FAA Detroit field Office. Brad Davidson of FAA Detroit confirmed that the FAA classifies the Alliance-Barber Airport as an airport serving piston-type aircraft. The limits of waste placement of units of the "New Central Waste Landfill" are approximately 9,800 feet from the closest runway end of the Alliance-Barber Airport. Note that this setback does not apply to any of the closed units of the "Old Central Waste Landfill" located north of the currently operating facility.

At the request of Ohio EPA, CWI has revised its permit application to contain provisions to submit a bird mitigation plan at least thirty (30) days prior to accepting waste under the permit.

4. **The proposed facility may be in violation of FAA Part 77 and affect aircraft instrument ascent and descent into both the Miller Airport and Alliance-Barber Airport, based upon the height of the proposed expansion.**

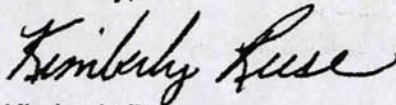
Central Waste Landfill - PTI #02-14224
Vertical and Lateral Expansion
Page 2

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Appeals Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street
Room 222
Columbus, Ohio 43215

If you have any questions, please contact the Ohio EPA District Office to which you submitted your application.

Sincerely,



Kimberly Reese
Systems Management Unit
Division of Solid & Infectious Waste Management

Enclosures: Permit to Install and Invoice

cc: Lynn Sowers, NEDO, DSIWM
John Schmidt, NEDO, DSIWM
Scott Hester, CO, DSIWM
Mary Ellen Smith, Mahoning Co. General Health District



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

April 1, 2015

Re: Ohio EPA Permit No: 3IN00313*FD
Facility Name: Central Waste Inc.

Central Waste Inc.
12003 Oyster Road
Alliance, OH 44601

Ladies and Gentlemen:

Transmitted herewith is one copy of final Modification to the above-referenced permit. This modification is effective on April 1, 2015/

If you have any questions, please contact the Northeast District Office at (330) 963-1200.

Sincerely,

Ed Swindall, Supervisor
Permit Processing Unit
Division of Surface Water

ERS/kep

Enclosure

CERTIFIED MAIL

cc: Northeast District Office
Journal Room
Compliance Section
File

**Ohio Environmental Protection Agency
Modification of National Pollutant Discharge
Elimination System (NPDES) Permit**

Issue Date: January 28, 2015

Existing Permit No.: 3IN00313*ED

Effective Date: April 1, 2015

Application No.: OH0128511

Entity Name: Central Waste Inc.

Facility Location: 12003 Oyster Road, Smith Twp., OH 44601, Mahoning County

In accordance with Rule 3745-33-04 (D) of the Ohio Administrative Code, the above referenced NPDES permit is hereby modified as follows:

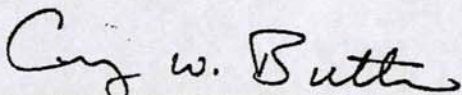
Revision

- 1) Part I, A. - Outfall 003-006 - Change all related measuring frequency from "2/year" to "When Disch." and monitoring months from "semi-annual" to "All"; and add note to define "When Discharging" Frequency.
- 2) Part II, Other Requirements, Item A - Remove Sampling Station 002 and description of location.

Attached is the modified NPDES permit.

All terms and conditions of the existing permit not recommended for modification by this document will remain in effect. Any modified term or condition contained in this modification shall supersede, on the date this modification is effective, the existing respective term or condition of the permit.

When the modification is effective, the Ohio EPA permit number will be changed to **3IN00313*FD**. The application number will remain OH0128511.



Craig W. Butler
Director

Application No. OH0128511

Modification Issue Date: January 28, 2015

Modification Effective Date: April 1, 2015

Expiration Date: February 28, 2017

Ohio Environmental Protection Agency
Authorization to Discharge Under the
National Pollutant Discharge Elimination System

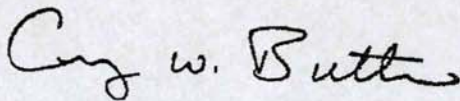
In compliance with the provisions of the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq., hereinafter referred to as the "Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111),

Central Waste, Inc.

is authorized by the Ohio Environmental Protection Agency, hereinafter referred to as "Ohio EPA," to discharge from the Central Waste, Inc. wastewater treatment works located at 12003 Oyster Road, Alliance, Ohio, Mahoning County and discharging to an unnamed tributary of Fish Creek in accordance with the conditions specified in Parts I, II, and III of this permit.

This permit is conditioned upon payment of applicable fees as required by Section 3745.11 of the Ohio Revised Code.

This permit and the authorization to discharge shall expire at midnight on the expiration date shown above. In order to receive authorization to discharge beyond the above date of expiration, the permittee shall submit such information and forms as are required by the Ohio EPA no later than 180 days prior to the above date of expiration.



Craig W. Butler
Director

Total Pages: 27

Part I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from outfall 3IN00313003. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

Table - Final Outfall - 003 - Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units		Loading* kg/day					Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Quarter	Grab	Quarterly
00045 - Total Precipitation - Inches	-	-	-	-	-	-	-	1/Day	24hr Total	All
00095 - Specific Conductance at 25 Degrees C - Umho/cm	-	-	-	-	-	-	-	1/Month	Grab	All
00310 - Biochemical Oxygen Demand, 5 Day - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00335 - Chemical Oxygen Demand (Low Level) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00400 - pH - S.U.	9.0	6.5	-	-	-	-	-	1/Month	Grab	All
00530 - Total Suspended Solids - mg/l	45	-	-	30	-	-	-	1/Month	Grab	All
00552 - Oil and Grease, Hexane Extr Method - mg/l	10.0	-	-	-	-	-	-	When Disch.	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00665 - Phosphorus, Total (P) - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00900 - Hardness, Total (CaCO3) - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00937 - Potassium, Total (K) - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00940 - Chloride, Total - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00978 - Arsenic, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00980 - Iron, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00981 - Selenium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00998 - Beryllium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All

Effluent Characteristic Parameter	Discharge Limitations						Monitoring Requirements		
	Concentration Specified Units			Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly		
01074 - Nickel, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
01094 - Zinc, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
01113 - Cadmium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
01114 - Lead, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
01118 - Chromium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
01119 - Copper, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
01220 - Chromium, Dissolved Hexavalent - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
01350 - Turbidity, Severity - Units	-	-	-	-	-	-	-	1/Day Estimate	All
34694 - Phenol - ug/l	-	-	-	-	-	-	-	When Disch. Grab	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day 24hr Total Estimate	All
50286 - Mercury, Total (Low Level, PQL=1000) - ng/l	-	-	-	-	-	-	-	When Disch. Grab	All
70301 - Solids, Dissolved-Sum of - mg/l	-	-	-	-	-	-	-	1/Month Grab	All

Notes for Station Number 3IN00313003:

- Sampling shall be performed when discharging. If NO DISCHARGE OCCURS DURING THE ENTIRE MONTH, report "AL" in the first column of the first day of the month on the 4500 Form (Monthly Operating Report). A signature is still required.

- Turbidity - See Part II, Item E.

- "When Discharging" Frequency - A minimum of one analysis shall be reported per semi-annual period. For these semi-annual monitoring requirements, sampling/reporting may be performed during any month in the semi-annual reporting periods of January - June and July - December. Semi-annual sampling must be performed for all parameters on the same day. During months, where semi-annual sampling is not conducted report "AH".

Part I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from outfall 3IN00313004. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

Table - Final Outfall - 004 - Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Quarter	Grab	Quarterly
00045 - Total Precipitation - Inches	-	-	-	-	-	-	-	1/Day	24hr Total	All
00095 - Specific Conductance at 25 Degrees C - Umho/cm	-	-	-	-	-	-	-	1/Month	Grab	All
00310 - Biochemical Oxygen Demand, 5 Day - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00335 - Chemical Oxygen Demand (Low Level) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00400 - pH - S.U.	9.0	6.5	-	-	-	-	-	1/Month	Grab	All
00530 - Total Suspended Solids - mg/l	45	-	-	30	-	-	-	1/Month	Grab	All
00552 - Oil and Grease, Hexane Extr Method - mg/l	10.0	-	-	-	-	-	-	When Disch.	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00665 - Phosphorus, Total (P) - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00900 - Hardness, Total (CaCO3) - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00937 - Potassium, Total (K) - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00940 - Chloride, Total - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00978 - Arsenic, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00980 - Iron, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00981 - Selenium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
00998 - Beryllium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
01074 - Nickel, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01094 - Zinc, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01113 - Cadmium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01114 - Lead, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01118 - Chromium, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01119 - Copper, Total Recoverable - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01220 - Chromium, Dissolved Hexavalent - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01350 - Turbidity, Severity - Units	-	-	-	-	-	-	-	1/Day	Estimate	All
34694 - Phenol - ug/l	-	-	-	-	-	-	-	When Disch.	Grab	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	24hr Total Estimate	All
50286 - Mercury, Total (Low Level, PQL=1000) - ng/l	-	-	-	-	-	-	-	When Disch.	Grab	All
70301 - Solids, Dissolved-Sum of - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All

Notes for Station Number 3IN00313004:

- Sampling shall be performed when discharging. If NO DISCHARGE OCCURS DURING THE ENTIRE MONTH, report "AL" in the first column of the first day of the month on the 4500 Form (Monthly Operating Report). A signature is still required.

- Turbidity - See Part II, Item E.

- "When Discharging" Frequency - A minimum of one analysis shall be reported per semi-annual period. For these semi-annual monitoring requirements, sampling/reporting may be performed during any month in the semi-annual reporting periods of January - June and July - December. Semi-annual sampling must be performed for all parameters on the same day. During months, where semi-annual sampling is not conducted report "AH".

Part I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from outfall 3IN0031005. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

Table - Final Outfall - 005 - Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00095 - Specific Conductance at 25 Degrees C - Umho/cm	-	-	-	-	-	-	-	1/Month	Grab	All
00400 - pH - S.U.	9.0	6.5	-	-	-	-	-	1/Month	Grab	All
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00552 - Oil and Grease, Hexane Extr Method - mg/l	10	-	-	-	-	-	-	When Disch.	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00940 - Chloride, Total - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01350 - Turbidity, Severity - Units	-	-	-	-	-	-	-	1/Day	Grab	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Total Estimate	All

Notes for Station Number 3IN00313005:

- Sampling shall be performed when discharging. If NO DISCHARGE OCCURS DURING THE ENTIRE MONTH, report "AL" in the first column of the first day of the month on the 4500 Form (Monthly Operating Report). A signature is still required.

- "When Discharging" Frequency - A minimum of one analysis shall be reported per semi-annual period. For these semi-annual monitoring requirements, sampling/reporting may be performed during any month in the semi-annual reporting periods of January - June and July - December. Semi-annual sampling must be performed for all parameters on the same day. During months, where semi-annual sampling is not conducted report "AH".

- Turbidity - See Part II, Item E.

Part I, A. - FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit and lasting until the expiration date, the permittee is authorized to discharge in accordance with the following limitations and monitoring requirements from outfall 3IN00031006. See Part II, OTHER REQUIREMENTS, for locations of effluent sampling.

Table - Final Outfall - 006 - Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00095 - Specific Conductance at 25 Degrees C - Umho/cm	-	-	-	-	-	-	-	1/Month	Grab	All
00400 - pH - S.U.	9.0	6.5	-	-	-	-	-	1/Month	Grab	All
00530 - Total Suspended Solids - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00552 - Oil and Grease, Hexane Extr Method - mg/l	10.0	-	-	-	-	-	-	When Disch.	Grab	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	1/Month	Grab	All
00940 - Chloride, Total - mg/l	-	-	-	-	-	-	-	When Disch.	Grab	All
01350 - Turbidity, Severity - Units	-	-	-	-	-	-	-	1/Day	Grab	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Total Estimate	All

Notes for Station Number 3IN00031006:

- Sampling shall be performed when discharging. If NO DISCHARGE OCCURS DURING THE ENTIRE MONTH, report "AL" in the first column of the first day of the month on the 4500 Form (Monthly Operating Report). A signature is still required.

- "When Discharging" Frequency - A minimum of one analysis shall be reported per semi-annual period. For these semi-annual monitoring requirements, sampling/reporting may be performed during any month in the semi-annual reporting periods of January - June and July - December. Semi-annual sampling must be performed for all parameters on the same day. During months, where semi-annual sampling is not conducted report "AH".

- Turbidity - See Part II, Item E.

Part I, C. SCHEDULE OF COMPLIANCE

Storm Water Pollution Prevention Plan

The permittee shall update the Storm Water Pollution Prevention Plan (SWP3) and submit updated section to the Ohio EPA Northeast District Office as soon as possible, but no later than 60 days from the effective date of this NPDES Perrmit Modification.

Part II, OTHER REQUIREMENTS

A. Description of the location of the required sampling stations are as follows:

Sampling Station	Description of Location
3IN00313003	Overflow from southern sedimentation basin (Pond 003) (Lat: 40N 56' 22"; Long: 81W 04' 19")
3IN00313004	Overflow from northern sedimentation basin (Pond 004) (Lat: 40N 56' 55"; Long: 81W 04' 09")
3IN00313005	Overflow from sedimentation Basin A
3IN00313006	Overflow from sedimentation Basin B

B. This permit shall be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act, if the effluent standard or limitation so issued or approved.

1. Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
2. Controls any pollutant not limited in the permit.

The permit as modified or reissued under this paragraph shall also contain any other requirements of the Act then applicable.

C. All parameters need not be monitored on days when the plant is not normally staffed (Saturdays, Sundays, and Holidays). On those days, report "AN" on the monthly report form.

D. Permit limitations may be revised in order to meet water quality standards after a stream use determination and waste load allocation are completed and approved. This permit may be modified, or alternatively, revoked and reissued, to comply with any applicable water quality effluent limitations.

E. If Severity Units are required for Turbidity, Odor, or Color, use the following table to determine the value between 0 and 4 that is reported.

REPORTED VALUE*	SEVERITY DESCRIPTION	TURBIDITY
0	None	Clear
1	Mild	
2	Moderate	Light Solids
3	Serious	
4	Extreme	Heavy Solids

* Interpolate between the descriptive phrases.

F. Grab samples shall be collected at such times and locations, and in such fashion, as to be representative of the facility's performance.

G. Storm Water Pollution Prevention Plan Requirements

A Storm Water Pollution Prevention Plan (SWP3) shall be developed to address each outfall that discharges to waters of the state that contains storm water associated with industrial activity.

1. Deadlines for Plan Preparation and Compliance.

If a Storm Water Pollution Prevention Plan does not exist:

The permittee, shall prepare, within six months of the effective date of this permit, a plan to manage storm water discharges associated with industrial activity. The Plan shall provide for implementation and compliance with the terms of the Plan within twelve months of the effective date of this permit.

If a Storm Water Pollution Prevention Plan already exists:

The permittee shall during the term of this permit operate the facility in accordance with the existing Storm Water Pollution Prevention Plan or with subsequent amendments to the Plan.

2. Signature and Plan Review.

- a. The Plan shall be signed by the authorized facility representative, and be retained on-site at the facility which generates the storm water discharge.
- b. The permittee shall make the Plan available upon request to the Ohio EPA Director, or authorized representative, or Regional Administrator of U.S. EPA, or in the case of a storm water discharge associated with industrial activity which discharges through a municipal separate storm sewer system, to the operator of the municipal system.
- c. The Director may notify the permittee at any time that the plan does not meet one or more of the minimum requirements. Within 30 days of such notification from the Director, the permittee shall make the required changes to the plan.
- d. The report shall be available to the public. The permittee may claim any portion of the storm water pollution plan as confidential in accordance with 40 CFR Part 2 and does not have to release any portion of the plan describing facility security measures.

3. Keeping Plans Current.

The permittee shall amend the plan whenever there is a change in design, construction, operation, or maintenance, that has a significant effect on the potential for the discharge of pollutants, or if the storm water pollution prevention plan proves to be ineffective in eliminating or significantly minimizing pollutants from each outfall source associated with industrial activity.

4. Contents of Plan. The plan shall include, at a minimum, the following items:

- a. Pollution Prevention Team - The plan shall identify a specific individual or individuals within the facility organization as members of a storm water Pollution Prevention Team that are responsible for developing the plan and assisting in the implementation, maintenance, and revisions.
- b. Description of Potential Pollutant Sources. The plan shall provide a description of potential sources which may reasonably be expected to add significant amounts of pollutants to storm water discharges. The plan shall include, at a minimum:
 - A map of the facility indicating the drainage areas of the site and the industrial activities which occur in each drainage area
 - An inventory of material that may be exposed to storm water
 - A description of the likely sources of pollutants from the site and a prediction of the pollutants which are likely to be present in the storm water
 - The history of the spills and leaks of toxic and hazardous materials over the last three years

c. Measures and Controls. The permittee shall develop storm water management controls appropriate to minimize pollution of storm water, and implement such controls. The description of storm water management controls shall address the following minimum components, including a schedule for implementing such controls:

- Good housekeeping of the industrial areas exposed to storm water
- Preventive maintenance of the storm water controls and other facility equipment
- Spill prevention and response procedures
- Testing of outfalls to ensure that there are no illicit discharges
- Employee training on pollution prevention measures and controls, and record keeping

d. Comprehensive Site Compliance Evaluation. Qualified personnel shall conduct site compliance evaluations at appropriate intervals specified in the plan, but in no case less than once a year. Such evaluations shall provide:

- Material handling areas and other potential sources of pollution identified in the plan shall be visually inspected for evidence of, or the potential for, pollutants entering the drainage system.
- Structural storm water management measures, sediment and control measures, and other structural pollution prevention measures identified in the plan shall be observed to ensure that they are operating correctly.

- A visual inspection of equipment needed to implement the plan, such as spill response equipment, shall be made.
- Based on the results of the inspection the plan shall be revised as appropriate within two weeks of such inspection and shall provide for implementation of any changes to the plan in a timely manner, but in no case more than twelve weeks after the inspection.
- A report summarizing the scope of the inspection, personnel making the inspection, the date(s) of the inspection, major observations relating to the implementation of the storm water pollution prevention plan, and actions taken shall be made and retained as part of the storm water pollution prevention plan for at least three years. The report shall be signed.

e. Discharges through Municipal Separate Storm Sewer Systems. Industrial facilities that discharge storm water through a large or medium municipal separate storm sewer system (serving a population of 100,000 or more) must comply with any applicable conditions established by the municipality's storm water management program. These facilities will be notified by the municipality.

f. Consistency with other plans. Storm water pollution prevention plans may reflect requirements for Spill Prevention Control and Countermeasure (SPCC) plans developed for the facility under section 311 of the Act or Best Management Practices (BMP) Programs otherwise required by a NPDES permit for the facility as long as such requirement is incorporated into the storm water pollution prevention plan.

g. Section 313, Reporting Facilities. Additional requirements for storm water discharges associated with industrial activity from facilities subject to SARA Title III, Section 313 requirements. The following specific control requirements must be practiced in areas where Section 313 water priority chemicals are stored, handled, processed, or transferred:

- Provide containment, drainage control, and/or diversionary structures
- Prevent discharges from liquid storage areas, material storage areas, loading/unloading areas, and handling/processing/transferring areas.
- Introduce facility security programs to prevent spills

H. Organic Pollutant Monitoring

For the purposes of further characterizing the discharge for organic pollutants, the permittee shall perform on an annual basis, a grab sample for volatile pollutants, and a 24- hour composite sample for pesticide pollutants and acid/base neutrals for outfall 3IN00313003. and 3IN00313004. Sedimentation pond discharge samples shall be prepared and analyzed by GC/MS in accordance with U.S. EPA promulgated methods 624 and 625 (January 1987). In additions to quantitative analysis for organic priority pollutants, a reasonable attempt shall be made to identify and quantify any additional substances indicated to be present in the GC/MS fractions by peaks on the reconstructed gas chromatograph (total ion plots) more than ten times higher than the adjacent peak-to-peak background noise.

Identification shall be referenced to the EPA/NIH computerized library of mass spectra, with visual confirmation by an experienced analyst. Quantification may be an order-of-magnitude estimate based upon comparison with an internal standard. GC/MS analysis results are to be reported to the appropriate district office with 30 days of receiving results from the library.

GC/MS or GC analysis results including copies of the GC strip charts and MS printouts are to be submitted to the Northeast District Office DSW upon written request. Upon selecting a laboratory to perform the GC/MS analytical work, the laboratory's quality control and quality assurance procedures must be reviewed by the permittee to ensure that the laboratory's quality control and quality assurance procedures meet the minimum requirements as described in the U.S. EPA promulgated methods. The permittee must request and receive copies of all the laboratory's written quality control and quality assurance methods used to define the quality of the data generated. These records shall be available for review by the representatives of the Ohio EPA. All records shall be kept for at least three years.

After review of the results of the organic pollutants program, the Ohio EPA may propose effluent limitations for specific organic pollutants, or continue, or modify the monitoring program as appropriate.

I. Monitoring Report Name Change

The name of the monitoring reports required for each effluent table contained in this permit has been changed from "Monthly Operating Report" (MOR) to "Discharge Monitoring Report" (DMR). The circumstances requiring the submittal of a DMR remain the same as those which were required for an MOR. Form 4500 must be used for DMR submittal.

PART III - GENERAL CONDITIONS

1. DEFINITIONS

"Daily discharge" means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

"Average weekly" discharge limitation means the highest allowable average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week. Each of the following 7-day periods is defined as a calendar week: Week 1 is Days 1 - 7 of the month; Week 2 is Days 8 - 14; Week 3 is Days 15 - 21; and Week 4 is Days 22 - 28. If the "daily discharge" on days 29, 30 or 31 exceeds the "average weekly" discharge limitation, Ohio EPA may elect to evaluate the last 7 days of the month as Week 4 instead of Days 22 - 28. Compliance with fecal coliform bacteria or E coli bacteria limitations shall be determined using the geometric mean.

"Average monthly" discharge limitation means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month. Compliance with fecal coliform bacteria or E coli bacteria limitations shall be determined using the geometric mean.

"85 percent removal" means the arithmetic mean of the values for effluent samples collected in a period of 30 consecutive days shall not exceed 15 percent of the arithmetic mean of the values for influent samples collected at approximately the same times during the same period.

"Absolute Limitations" Compliance with limitations having descriptions of "shall not be less than," "nor greater than," "shall not exceed," "minimum," or "maximum" shall be determined from any single value for effluent samples and/or measurements collected.

"Net concentration" shall mean the difference between the concentration of a given substance in a sample taken of the discharge and the concentration of the same substances in a sample taken at the intake which supplies water to the given process. For the purpose of this definition, samples that are taken to determine the net concentration shall always be 24-hour composite samples made up of at least six increments taken at regular intervals throughout the plant day.

"Net Load" shall mean the difference between the load of a given substance as calculated from a sample taken of the discharge and the load of the same substance in a sample taken at the intake which supplies water to given process. For purposes of this definition, samples that are taken to determine the net loading shall always be 24-hour composite samples made up of at least six increments taken at regular intervals throughout the plant day.

"MGD" means million gallons per day.

"mg/l" means milligrams per liter.

"ug/l" means micrograms per liter.

"ng/l" means nanograms per liter.

"S.U." means standard pH unit.

"kg/day" means kilograms per day.

"Reporting Code" is a five digit number used by the Ohio EPA in processing reported data. The reporting code does not imply the type of analysis used nor the sampling techniques employed.

"Quarterly (1/Quarter) sampling frequency" means the sampling shall be done in the months of March, June, August, and December, unless specifically identified otherwise in the Effluent Limitations and Monitoring Requirements table.

"Yearly (1/Year) sampling frequency" means the sampling shall be done in the month of September, unless specifically identified otherwise in the effluent limitations and monitoring requirements table.

"Semi-annual (2/Year) sampling frequency" means the sampling shall be done during the months of June and December, unless specifically identified otherwise.

"Winter" shall be considered to be the period from November 1 through April 30.

"Bypass" means the intentional diversion of waste streams from any portion of the treatment facility.

"Summer" shall be considered to be the period from May 1 through October 31.

"Severe property damage" means substantial physical damage to property, damage to the treatment facilities which would cause them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

Part III General Conditions (Con't)

"Sewage sludge" means a solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works as defined in section 6111.01 of the Revised Code. "Sewage sludge" includes, but is not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment processes. "Sewage sludge" does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator, grit and screenings generated during preliminary treatment of domestic sewage in a treatment works, animal manure, residue generated during treatment of animal manure, or domestic septage.

"Sewage sludge weight" means the weight of sewage sludge, in dry U.S. tons, including admixtures such as liming materials or bulking agents. Monitoring frequencies for sewage sludge parameters are based on the reported sludge weight generated in a calendar year (use the most recent calendar year data when the NPDES permit is up for renewal).

"Sewage sludge fee weight" means the weight of sewage sludge, in dry U.S. tons, excluding admixtures such as liming materials or bulking agents. Annual sewage sludge fees, as per section 3745.11(Y) of the Ohio Revised Code, are based on the reported sludge fee weight for the most recent calendar year.

2. GENERAL EFFLUENT LIMITATIONS

The effluent shall, at all times, be free of substances:

- A. In amounts that will settle to form putrescent, or otherwise objectionable, sludge deposits; or that will adversely affect aquatic life or water fowl;
- B. Of an oily, greasy, or surface-active nature, and of other floating debris, in amounts that will form noticeable accumulations of scum, foam or sheen;
- C. In amounts that will alter the natural color or odor of the receiving water to such degree as to create a nuisance;
- D. In amounts that either singly or in combination with other substances are toxic to human, animal, or aquatic life;
- E. In amounts that are conducive to the growth of aquatic weeds or algae to the extent that such growths become inimical to more desirable forms of aquatic life, or create conditions that are unsightly, or constitute a nuisance in any other fashion;
- F. In amounts that will impair designated instream or downstream water uses.

3. FACILITY OPERATION AND QUALITY CONTROL

All wastewater treatment works shall be operated in a manner consistent with the following:

- A. At all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with conditions of the permit.
- B. The permittee shall effectively monitor the operation and efficiency of treatment and control facilities and the quantity and quality of the treated discharge.
- C. Maintenance of wastewater treatment works that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by Ohio EPA as specified in the Paragraph in the PART III entitled, "UNAUTHORIZED DISCHARGES".

4. REPORTING

A. Monitoring data required by this permit shall be submitted monthly on Ohio EPA 4500 Discharge Monitoring Report (DMR) forms using the electronic DMR (e-DMR) internet application. e-DMR allows permitted facilities to enter, sign, and submit DMRs on the internet. e-DMR information is found on the following web page:

<http://www.epa.ohio.gov/dsw/edmr/eDMR.aspx>

Alternatively, if you are unable to use e-DMR due to a demonstrated hardship, monitoring data may be submitted on paper DMR forms provided by Ohio EPA. Monitoring data shall be typed on the forms. Please contact Ohio EPA, Division of Surface Water at (614) 644-2050 if you wish to receive paper DMR forms.

B. DMRs shall be signed by a facility's Responsible Official or a Delegated Responsible Official (i.e. a person delegated by the Responsible Official). The Responsible Official of a facility is defined as:

1. For corporations - a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation; or the manager of one or more manufacturing, production or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures;
2. For partnerships - a general partner;
3. For a sole proprietorship - the proprietor; or,
4. For a municipality, state or other public facility - a principal executive officer, a ranking elected official or other duly authorized employee.

For e-DMR, the person signing and submitting the DMR will need to obtain an eBusiness Center account and Personal Identification Number (PIN). Additionally, Delegated Responsible Officials must be delegated by the Responsible Official, either on-line using the eBusiness Center's delegation function, or on a paper delegation form provided by Ohio EPA. For more information on the PIN and delegation processes, please view the following web page:

<http://epa.ohio.gov/dsw/edmr/eDMR.aspx>

C. DMRs submitted using e-DMR shall be submitted to Ohio EPA by the 20th day of the month following the month-of-interest. DMRs submitted on paper must include the original signed DMR form and shall be mailed to Ohio EPA at the following address so that they are received no later than the 15th day of the month following the month-of-interest:

Ohio Environmental Protection Agency
Lazarus Government Center
Division of Surface Water - PCU
P.O. Box 1049
Columbus, Ohio 43216-1049

D. Regardless of the submission method, a paper copy of the submitted Ohio EPA 4500 DMR shall be maintained onsite for records retention purposes (see Section 7. RECORDS RETENTION). For e-DMR users, view and print the DMR from the Submission Report Information page after each original or revised DMR is submitted. For submittals on paper, make a copy of the completed paper form after it is signed by a Responsible Official or a Delegated Responsible Official.

E. If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified in Section 5. SAMPLING AND ANALYTICAL METHODS, the results of such monitoring shall be included in the calculation and reporting of the values required in the reports specified above.

F. Analyses of pollutants not required by this permit, except as noted in the preceding paragraph, shall not be reported to the Ohio EPA, but records shall be retained as specified in Section 7. RECORDS RETENTION.

5. SAMPLING AND ANALYTICAL METHOD

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored flow. Test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants" unless other test procedures have been specified in this permit. The permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to insure accuracy of measurements.

6. RECORDING OF RESULTS

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- A. The exact place and date of sampling; (time of sampling not required on EPA 4500)
- B. The person(s) who performed the sampling or measurements;
- C. The date the analyses were performed on those samples;
- D. The person(s) who performed the analyses;
- E. The analytical techniques or methods used; and
- F. The results of all analyses and measurements.

7. RECORDS RETENTION

The permittee shall retain all of the following records for the wastewater treatment works for a minimum of three years except those records that pertain to sewage sludge disposal, use, storage, or treatment, which shall be kept for a minimum of five years, including:

- A. All sampling and analytical records (including internal sampling data not reported);
- B. All original recordings for any continuous monitoring instrumentation;
- C. All instrumentation, calibration and maintenance records;
- D. All plant operation and maintenance records;
- E. All reports required by this permit; and
- F. Records of all data used to complete the application for this permit for a period of at least three years, or five years for sewage sludge, from the date of the sample, measurement, report, or application.

These periods will be extended during the course of any unresolved litigation, or when requested by the Regional Administrator or the Ohio EPA. The three year period, or five year period for sewage sludge, for retention of records shall start from the date of sample, measurement, report, or application.

8. AVAILABILITY OF REPORTS

Except for data determined by the Ohio EPA to be entitled to confidential status, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate district offices of the Ohio EPA. Both the Clean Water Act and Section 6111.05 Ohio Revised Code state that effluent data and receiving water quality data shall not be considered confidential.

9. DUTY TO PROVIDE INFORMATION

The permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with this permit. The permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

10. RIGHT OF ENTRY

The permittee shall allow the Director or an authorized representative upon presentation of credentials and other documents as may be required by law to:

- A. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit.
- B. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit.
- C. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit.
- D. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

11. UNAUTHORIZED DISCHARGES

A. Bypass Not Exceeding Limitations - The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 11.B and 11.C.

B. Notice

1. Anticipated Bypass - If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.

2. Unanticipated Bypass - The permittee shall submit notice of an unanticipated bypass as required in paragraph 12.B (24 hour notice).

C. Prohibition of Bypass

1. Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass, unless:

a. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

b. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

c. The permittee submitted notices as required under paragraph 11.B.

2. The Director may approve an anticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed above in paragraph 11.C.1.

12. NONCOMPLIANCE NOTIFICATION

A. Exceedance of a Daily Maximum Discharge Limit

1. The permittee shall report noncompliance that is the result of any violation of a daily maximum discharge limit for any of the pollutants listed by the Director in the permit by e-mail or telephone within twenty-four (24) hours of discovery.

The permittee may report to the appropriate Ohio EPA district office e-mail account as follows (this method is preferred):

Southeast District Office: sedo24hourmpdes@epa.state.oh.us
Southwest District Office: swdo24hourmpdes@epa.state.oh.us
Northwest District Office: nwdo24hourmpdes@epa.state.oh.us
Northeast District Office: nedo24hourmpdes@epa.state.oh.us
Central District Office: cdo24hourmpdes@epa.state.oh.us
Central Office: co24hourmpdes@epa.state.oh.us

The permittee shall attach a noncompliance report to the e-mail. A noncompliance report form is available on the following web site under the Monitoring and Reporting - Non-Compliance Notification section:

<http://epa.ohio.gov/dsw/permits/individuals.aspx>

Or, the permittee may report to the appropriate Ohio EPA district office by telephone toll-free between 8:00 AM and 5:00 PM as follows:

Southeast District Office: (800) 686-7330
Southwest District Office: (800) 686-8930
Northwest District Office: (800) 686-6930
Northeast District Office: (800) 686-6330
Central District Office: (800) 686-2330
Central Office: (614) 644-2001

The permittee shall include the following information in the telephone noncompliance report:

- a. The name of the permittee, and a contact name and telephone number;
- b. The limit(s) that has been exceeded;
- c. The extent of the exceedance(s);
- d. The cause of the exceedance(s);
- e. The period of the exceedance(s) including exact dates and times;
- f. If uncorrected, the anticipated time the exceedance(s) is expected to continue; and,
- g. Steps taken to reduce, eliminate or prevent occurrence of the exceedance(s).

B. Other Permit Violations

1. The permittee shall report noncompliance that is the result of any unanticipated bypass resulting in an exceedance of any effluent limit in the permit or any upset resulting in an exceedance of any effluent limit in the permit by e-mail or telephone within twenty-four (24) hours of discovery.

The permittee may report to the appropriate Ohio EPA district office e-mail account as follows (this method is preferred):

Southeast District Office: sedo24hournpdes@epa.state.oh.us
Southwest District Office: swdo24hournpdes@epa.state.oh.us
Northwest District Office: nwdo24hournpdes@epa.state.oh.us
Northeast District Office: nedo24hournpdes@epa.state.oh.us
Central District Office: cdo24hournpdes@epa.state.oh.us
Central Office: co24hournpdes@epa.state.oh.us

The permittee shall attach a noncompliance report to the e-mail. A noncompliance report form is available on the following web site:

<http://www.epa.ohio.gov/dsw/permits/permits.aspx>

Or, the permittee may report to the appropriate Ohio EPA district office by telephone toll-free between 8:00 AM and 5:00 PM as follows:

Southeast District Office: (800) 686-7330
Southwest District Office: (800) 686-8930
Northwest District Office: (800) 686-6930
Northeast District Office: (800) 686-6330
Central District Office: (800) 686-2330
Central Office: (614) 644-2001

The permittee shall include the following information in the telephone noncompliance report:

- a. The name of the permittee, and a contact name and telephone number;
- b. The time(s) at which the discharge occurred, and was discovered;
- c. The approximate amount and the characteristics of the discharge;
- d. The stream(s) affected by the discharge;
- e. The circumstances which created the discharge;
- f. The name and telephone number of the person(s) who have knowledge of these circumstances;
- g. What remedial steps are being taken; and,
- h. The name and telephone number of the person(s) responsible for such remedial steps.

2. The permittee shall report noncompliance that is the result of any spill or discharge which may endanger human health or the environment within thirty (30) minutes of discovery by calling the 24-Hour Emergency Hotline toll-free at (800) 282-9378. The permittee shall also report the spill or discharge by e-mail or telephone within twenty-four (24) hours of discovery in accordance with B.1 above.

C. When the telephone option is used for the noncompliance reports required by A and B, the permittee shall submit to the appropriate Ohio EPA district office a confirmation letter and a completed noncompliance report within five (5) days of the discovery of the noncompliance. This follow up report is not necessary for the e-mail option which already includes a completed noncompliance report.

D. If the permittee is unable to meet any date for achieving an event, as specified in a schedule of compliance in their permit, the permittee shall submit a written report to the appropriate Ohio EPA district office within fourteen (14) days of becoming aware of such a situation. The report shall include the following:

1. The compliance event which has been or will be violated;
2. The cause of the violation;
3. The remedial action being taken;
4. The probable date by which compliance will occur; and,
5. The probability of complying with subsequent and final events as scheduled.

E. The permittee shall report all other instances of permit noncompliance not reported under paragraphs A or B of this section on their monthly DMR submission. The DMR shall contain comments that include the information listed in paragraphs A or B as appropriate.

F. If the permittee becomes aware that it failed to submit an application, or submitted incorrect information in an application or in any report to the director, it shall promptly submit such facts or information.

13. RESERVED

14. DUTY TO MITIGATE

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

15. AUTHORIZED DISCHARGES

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than, or at a level in excess of, that authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such violations may result in the imposition of civil and/or criminal penalties as provided for in Section 309 of the Act and Ohio Revised Code Sections 6111.09 and 6111.99.

16. DISCHARGE CHANGES

The following changes must be reported to the appropriate Ohio EPA district office as soon as practicable:

A. For all treatment works, any significant change in character of the discharge which the permittee knows or has reason to believe has occurred or will occur which would constitute cause for modification or revocation and reissuance. The permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. Notification of permit changes or anticipated noncompliance does not stay any permit condition.

B. For publicly owned treatment works:

1. Any proposed plant modification, addition, and/or expansion that will change the capacity or efficiency of the plant;
2. The addition of any new significant industrial discharge; and
3. Changes in the quantity or quality of the wastes from existing tributary industrial discharges which will result in significant new or increased discharges of pollutants.

C. For non-publicly owned treatment works, any proposed facility expansions, production increases, or process modifications, which will result in new, different, or increased discharges of pollutants.

Following this notice, modifications to the permit may be made to reflect any necessary changes in permit conditions, including any necessary effluent limitations for any pollutants not identified and limited herein. A determination will also be made as to whether a National Environmental Policy Act (NEPA) review will be required. Sections 6111.44 and 6111.45, Ohio Revised Code, require that plans for treatment works or improvements to such works be approved by the Director of the Ohio EPA prior to initiation of construction.

D. In addition to the reporting requirements under 40 CFR 122.41(l) and per 40 CFR 122.42(a), all existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

1. That any activity has occurred or will occur which would result in the discharge on a routine or frequent basis of any toxic pollutant which is not limited in the permit. If that discharge will exceed the highest of the "notification levels" specified in 40 CFR Sections 122.42(a)(1)(i) through 122.42(a)(1)(iv).
2. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the "notification levels" specified in 122.42(a)(2)(i) through 122.42(a)(2)(iv).

17. TOXIC POLLUTANTS

The permittee shall comply with effluent standards or prohibitions established under Section 307 (a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement. Following establishment of such standards or prohibitions, the Director shall modify this permit and so notify the permittee.

18. PERMIT MODIFICATION OR REVOCATION

A. After notice and opportunity for a hearing, this permit may be modified or revoked, by the Ohio EPA, in whole or in part during its term for cause including, but not limited to, the following:

1. Violation of any terms or conditions of this permit;
2. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
3. Change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge.

B. Pursuant to rule 3745-33-04, Ohio Administrative Code, the permittee may at any time apply to the Ohio EPA for modification of any part of this permit. The filing of a request by the permittee for a permit modification or revocation does not stay any permit condition. The application for modification should be received by the appropriate Ohio EPA district office at least ninety days before the date on which it is desired that the modification become effective. The application shall be made only on forms approved by the Ohio EPA.

19. TRANSFER OF OWNERSHIP OR CONTROL

This permit may be transferred or assigned and a new owner or successor can be authorized to discharge from this facility, provided the following requirements are met:

A. The permittee shall notify the succeeding owner or successor of the existence of this permit by a letter, a copy of which shall be forwarded to the appropriate Ohio EPA district office. The copy of that letter will serve as the permittee's notice to the Director of the proposed transfer. The copy of that letter shall be received by the appropriate Ohio EPA district office sixty (60) days prior to the proposed date of transfer;

B. A written agreement containing a specific date for transfer of permit responsibility and coverage between the current and new permittee (including acknowledgement that the existing permittee is liable for violations up to that date, and that the new permittee is liable for violations from that date on) shall be submitted to the appropriate Ohio EPA district office within sixty days after receipt by the district office of the copy of the letter from the permittee to the succeeding owner;

At anytime during the sixty (60) day period between notification of the proposed transfer and the effective date of the transfer, the Director may prevent the transfer if he concludes that such transfer will jeopardize compliance with the terms and conditions of the permit. If the Director does not prevent transfer, he will modify the permit to reflect the new owner.

20. OIL AND HAZARDOUS SUBSTANCE LIABILITY

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Clean Water Act.

21. SOLIDS DISPOSAL

Collected grit and screenings, and other solids other than sewage sludge, shall be disposed of in such a manner as to prevent entry of those wastes into waters of the state, and in accordance with all applicable laws and rules.

22. CONSTRUCTION AFFECTING NAVIGABLE WATERS

This permit does not authorize or approve the construction of any onshore or offshore physical structures or facilities or the undertaking of any work in any navigable waters.

23. CIVIL AND CRIMINAL LIABILITY

Except as exempted in the permit conditions on UNAUTHORIZED DISCHARGES or UPSETS, nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

24. STATE LAWS AND REGULATIONS

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation under authority preserved by Section 510 of the Clean Water Act.

25. PROPERTY RIGHTS

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges; nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

26. UPSET

The provisions of 40 CFR Section 122.41(n), relating to "Upset," are specifically incorporated herein by reference in their entirety. For definition of "upset," see Part III, Paragraph 1, DEFINITIONS.

27. SEVERABILITY

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

28. SIGNATORY REQUIREMENTS

All applications submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR 122.22.

All reports submitted to the Director shall be signed and certified in accordance with the requirements of 40 CFR Section 122.22.

29. OTHER INFORMATION

A. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

B. ORC 6111.99 provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than \$25,000 per violation.

C. ORC 6111.99 states that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than \$25,000 per violation.

D. ORC 6111.99 provides that any person who violates Sections 6111.04, 6111.042, 6111.05, or division (A) of Section 6111.07 of the Revised Code shall be fined not more than \$25,000 or imprisoned not more than one year, or both.

30. NEED TO HALT OR REDUCE ACTIVITY

40 CFR 122.41(c) states that it shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with conditions of this permit.

31. APPLICABLE FEDERAL RULES

All references to 40 CFR in this permit mean the version of 40 CFR which is effective as of the effective date of this permit.

32. AVAILABILITY OF PUBLIC SEWERS

Notwithstanding the issuance or non-issuance of an NPDES permit to a semi-public disposal system, whenever the sewage system of a publicly owned treatment works becomes available and accessible, the permittee operating any semi-public disposal system shall abandon the semi-public disposal system and connect it into the publicly owned treatment works.



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215
October 07, 2008

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Alliance
Mahoning County
Application No. 657122
Application for Construction of a new
sediment control pond for treatment of
storm water runoff from the west and southern
limits of the Central Waste Landfill
Plans Received on June 24, 2008
Revised Plans Received August 22, 2008
From: Civil & Environmental Consultants, Inc.
CERTIFIED MAIL

Central Waste, Inc.
Attn: Tom Johnson, General Manager
12003 Oyster Road
Alliance, OH 44601

Ladies and Gentlemen:

Enclosed is the Ohio EPA Permit to Install which will allow you to install the described source in the manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. 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 which the Commission, in its discretion, may reduce if by affidavit you demonstrate 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, 309 South Fourth Street, Room 222, Columbus, Ohio 43215

You should note that a general condition of your permit states that issuance of the permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

If you have any questions, please contact the Ohio EPA district office to which you submitted your application.

Sincerely,

Patti L. Smith, Supervisor
Permit Processing Unit
Division of Surface Water

PLS/sg
Enclosure

cc: Northeast District Office
Mahoning County General Health District
Civil & Environmental Consultants, Inc.
Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio Environmental Protection Agency

Permit to Install

Application No: 657122

Applicant Name: Central Waste, Inc.
Address: 12003 Oyster Road
City: Alliance
State Zip: OH 44601

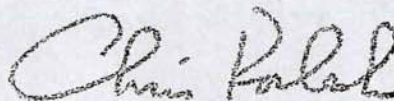
Person to Contact: Tom Johnson, General Manager
Telephone: 330-823-6220

Description of Proposed Source: Construction of a new sediment control pond for treatment of storm water runoff from the west and southern limits of the Central Waste Landfill, Alliance, Mahoning County

Issuance Date: October 07, 2008
Effective Date: October 07, 2008

The above named entity is hereby granted a permit to install for the above described source pursuant to Chapter 3745-42 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source of environmental pollutants will operate in compliance with applicable state and federal laws and regulations. Issuance of this permit does not constitute expressed or implied assurance that, if constructed or modified in accordance with those plans and specifications, the above described source of pollutants will be granted the necessary operating permits. This permit is granted subject to the following conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director
P.O. Box 1049
50 West Town Street, Suite 700
Columbus, OH 43216-1049

This permit shall expire if construction has not been initiated by the applicant within eighteen months of the effective date of this permit. By accepting this permit, the applicant acknowledges that this eighteen month period shall not be considered or construed as extending or having any effect whatsoever on any compliance schedule or deadline set forth in any administrative or court order issued to or binding upon the permit applicant, and the applicant shall abide by such compliance schedules or deadlines to avoid the initiation of additional legal action by the Ohio EPA.

The director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records, or reports pertaining to the construction, modification, or installation of the above described source of environmental pollutants.

Issuance of this permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

Any well, well point, pit, or other device installed for the purpose of lowering the ground water level to facilitate construction of this project shall be properly abandoned in accordance with the provisions of this plan or as directed by the director or his representative.

Any person installing any well, well point, pit or other device used for the purpose of removing ground water from an aquifer shall complete and file a Well Log and Drilling Report form with the Ohio Department of Natural Resources, Division of Water, within 30 days of the well completion in accordance with the Ohio Revised code Section 1521.01 and 1521.05. In addition, any such facility that has a capacity to withdraw waters of the state in an amount greater than 100,000 gallons per day from all sources shall be registered by the owner with the chief of the Division of Water, Ohio Department of Natural Resources, within three months after the facility is completed in accordance with Section 1521.16 of the Ohio Revised Code. For copies of the necessary well log, drilling report, or registration forms, please contact:

Ohio Department of Natural Resources
2045 Morse Road Bldg. E
Columbus, OH 43229-6693
(614) 265-6717

The proposed wastewater disposal system shall be constructed in strict accordance with the plans and application approved by the director of the Ohio Environmental Protection Agency. There shall be no deviation from these plans without the prior express, written approval of the agency. Any deviations from these plans or the above conditions may lead to such sanctions and penalties as provided for under Ohio law. Approval of these plans and issuance of this permit does not constitute an assurance by the Ohio Environmental Protection Agency that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction area for this project is one acre or more, or is part of a larger development that is one acre or more, the applicant must submit a Notice of Intent (NOI) for coverage under the general construction stormwater permit to Ohio EPA at least 21 days prior to the start of construction of this project.

This permit to install applies only to the wastewater disposal system listed above. The installation of drinking water supplies, air contaminant sources, or solid waste disposal facilities will require the submittal of a separate application to the director.

Permit-to-Install No. 657122 - Silt Trap A
 Central Waste Landfill
 12003 Oyster Road
 Alliance, OH

On June 24, 2008, Central Waste Inc. proposed the construction of a new sediment control pond for the treatment of storm water runoff from the west and southern limits of the landfill property. The runoff area is outside the limits of waste placement previously approved by the Division of Solid and Infectious Waste Management.

The design of the sedimentation pond was based on Ohio Administrative Code 3745-27-08. The design requirements are as follows.

1. The volume of the sediment retention pond under the elevation of the principal spill way must be equal to the runoff volume of a 10 yr./24 hr. storm event.
2. The capacity of the principal spillway must be equal to the runoff rate of a 10 yr./24 hr. storm event.
3. The inlet elevation of the emergency spillway shall provide flood storage with no flow entering the emergency spillway while allowing flow through the principal spillway during a 25 yr./24 hr storm event.
4. The combination of principal and emergency spillways shall safely discharge the flow from a 100 yr./24 hr. storm event using nonmechanical means.
5. The embankment design shall provide for no less than one foot net freeboard when flow is at the design depth, after allowance for embankment settlement.

The 2006 HydroCAD Model from Software Solutions, LLC was used to confirm the configuration of the retention pond and to demonstrate compliance with the criteria for design. Following is a presentation of the model results.

→ Sediment Pond Design

Storm Event	Inflow (cfs)	Inflow (ac.-ft.)	Spillway			
			Primary (cfs)	Primary (ac.-ft.)	Secondary (cfs)	Secondary (ac.-ft.)
10 yr.-24 hr.	42.11	5.02	0.00	0.00	0.00 cfs	0.00
25 yr.-24 hr.	60.82	7.304	4.66	1.67	0.00 cfs	0.00
100 yr.-24 hr.	95.42	11.580	12.25	3.906	18.15 cfs	1.932

→ Embankment Elevation to Maintain a One Foot Freeboard

Location	Elevation
Emergency Spillway Elevation	1060.4 ft
Max. Flow Elevation during 100 yr.-24 hr. event	1061.0 ft
Perimeter Berm Crest Elevation	1062.0 ft.



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215
October 07, 2008

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

Re: Alliance
Mahoning County
Application No. 658287
Application for Constructed wetland to treat
stormwater runoff from the Central Waste
transfer building at 12003 Oyster Road
Plans Received on June 24, 2008
Revised Plans Received August 29, 2008
From: Civil & Environmental Consultants, Inc.
CERTIFIED MAIL

Central Waste, Inc.
Attn: Tom Johnson, General Manager
12003 Oyster Road
Alliance, OH 44601

Ladies and Gentlemen:

Enclosed is the Ohio EPA Permit to Install which will allow you to install the described source in the manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. 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 which the Commission, in its discretion, may reduce if by affidavit you demonstrate 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, 309 South Fourth Street, Room 222, Columbus, Ohio 43215

You should note that a general condition of your permit states that issuance of the permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

If you have any questions, please contact the Ohio EPA district office to which you submitted your application.

Sincerely,

Patti L. Smith, Supervisor
Permit Processing Unit
Division of Surface Water

PLS/sg
Enclosure

cc: Northeast District Office
Mahoning County General Health District
Civil & Environmental Consultants, Inc.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

OCT 09 2008

Ohio Environmental Protection Agency

Permit to Install

Application No: 658287

Applicant Name: Central Waste, Inc.
Address: 12003 Oyster Road
City: Alliance
State Zip: OH 44601

Person to Contact: Tom Johnson, General Manager
Telephone: 330-823-6220

Description of Proposed Source: Constructed wetland to treat stormwater runoff from the Central Waste transfer building at 12003 Oyster Road, Alliance, Mahoning County

Issuance Date: October 07, 2008
Effective Date: October 07, 2008

The above named entity is hereby granted a permit to install for the above described source pursuant to Chapter 3745-42 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source of environmental pollutants will operate in compliance with applicable state and federal laws and regulations. Issuance of this permit does not constitute expressed or implied assurance that, if constructed or modified in accordance with those plans and specifications, the above described source of pollutants will be granted the necessary operating permits. This permit is granted subject to the following conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director
P.O. Box 1049
50 West Town Street, Suite 700
Columbus, OH 43216-1049

This permit shall expire if construction has not been initiated by the applicant within eighteen months of the effective date of this permit. By accepting this permit, the applicant acknowledges that this eighteen month period shall not be considered or construed as extending or having any effect whatsoever on any compliance schedule or deadline set forth in any administrative or court order issued to or binding upon the permit applicant, and the applicant shall abide by such compliance schedules or deadlines to avoid the initiation of additional legal action by the Ohio EPA.

The director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records, or reports pertaining to the construction, modification, or installation of the above described source of environmental pollutants.

Issuance of this permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

Any well, well point, pit, or other device installed for the purpose of lowering the ground water level to facilitate construction of this project shall be properly abandoned in accordance with the provisions of this plan or as directed by the director or his representative.

Any person installing any well, well point, pit or other device used for the purpose of removing ground water from an aquifer shall complete and file a Well Log and Drilling Report form with the Ohio Department of Natural Resources, Division of Water, within 30 days of the well completion in accordance with the Ohio Revised code Section 1521.01 and 1521.05. In addition, any such facility that has a capacity to withdraw waters of the state in an amount greater than 100,000 gallons per day from all sources shall be registered by the owner with the chief of the Division of Water, Ohio Department of Natural Resources, within three months after the facility is completed in accordance with Section 1521.16 of the Ohio Revised Code. For copies of the necessary well log, drilling report, or registration forms, please contact:

Ohio Department of Natural Resources
2045 Morse Road Bldg. E
Columbus, OH 43229-6693
(614) 265-6717

The proposed wastewater disposal system shall be constructed in strict accordance with the plans and application approved by the director of the Ohio Environmental Protection Agency. There shall be no deviation from these plans without the prior express, written approval of the agency. Any deviations from these plans or the above conditions may lead to such sanctions and penalties as provided for under Ohio law. Approval of these plans and issuance of this permit does not constitute an assurance by the Ohio Environmental Protection Agency that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

This permit to install applies only to the wastewater disposal system listed above. The installation of drinking water supplies, air contaminant sources, or solid waste disposal facilities will require the submittal of a separate application to the director.

The Northeast District office of the Ohio Environmental Protection Agency shall be notified in writing as to (a) the construction starting date; (b) the construction completion date; and (c) the date the wastewater disposal system was placed into operation.

**PERMIT-TO-INSTALL NO. 658287 - CONSTRUCTED WETLAND
CENTRAL WASTE LANDFILL
12003 OYSTER ROAD
ALLIANCE, OH**

On August 29, 2008, Central Waste Inc. submitted to the Northeast District Office, a final proposal for a new constructed wetland. The wetland is to treat and discharge storm water runoff from the waste transfer building. The water flowing into the constructed wetland is only rainwater from the roof of the building. The discharge from the constructed wetland will be directed into an adjacent natural wetland.

The design of the sedimentation pond was based on the Ohio Rainwater and Land Development Manual. The HydroCAD Model was used to calculate the runoff volume to the wetland based on the 100 yr./24 hr. storm event. The Flowmaster Model was used to calculate the flow conditions through the level spreader outlet at the 100 yr./24 hr. storm event. The outlet was modeled as an open channel using Manning's Equation.

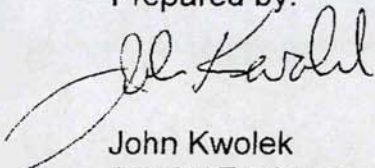
Calculations for the Water Quality Volume (WQ_v) and the surface area are provided in Attachment C. Details regarding the level spreader design are also presented in Attachment C along with the HydroCAD and Flowmaster inputs and outputs.

The wetland will be 20 ft. wide and 40 ft. long. The level spreader outlet will be 16 ft. wide and will have a channel length of 4 feet. The wetland soils will be 2.5 ft. deep and will provide the 40 detention time for the WQ_v (566.3 cf). Plants for the wetland will be transplanted from on-site natural wetlands. Details of the wetland design are presented in the detailed drawing that accompanied the application.

In addition to the constructed wetland, Central Waste Inc. will construct the roadside ditches as triangular grassed channels. The grassed channels will drain the area surrounding the rail unloading area and are designed to prevent erosion in the ditches during rain events. The grassed channels will discharge into existing natural wetlands.

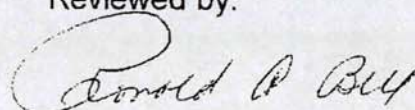
It is recommended that the permit-to-install application be approved per the standard conditions.

Prepared by:



John Kwolek
District Engineer
Division of Surface Water

Reviewed by:



Ronald A. Bell, P. E.
Unit Supervisor
Division of Surface Water

JK/RAB/mt
October 3, 2008



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

November 17, 2009

Re: Smith Twp.
Mahoning County
Application No. 726093
Application for Construction of Temporary
Sedimentation Basins for Central Waste
Borrow Area A at 12003 Oyster Road
Plans Received on August 31, 2009
Revised Plans Received October 22, 2009
From: Civil & Environmental Consultants, Inc.
CERTIFIED MAIL

Central Waste, Inc.
Attn: Tom Johnson, General Manager
12003 Oyster Road
Alliance, OH 44601

Ladies and Gentlemen:

Enclosed is the Ohio EPA Permit to Install which will allow you to install the described source in the manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. 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 which the Commission, in its discretion, may reduce if by affidavit you demonstrate 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, 309 South Fourth Street, Room 222, Columbus, Ohio 43215

You should note that a general condition of your permit states that issuance of the permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

If you have any questions, please contact the Ohio EPA district office to which you submitted your application.

Sincerely,

Patti L. Smith, Supervisor
Permit Processing Unit
Division of Surface Water

PLS/sg
Enclosure

cc: Northeast District Office
Civil & Environmental Consultants, Inc. - Pittsburgh
Mahoning County General Health District
John Schmidt, DSIWM, NEDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Ohio EPA is an Equal Opportunity Employer

NOV 19 2009

Ohio Environmental Protection Agency

Permit to Install

Application No: 726093

Applicant Name: Central Waste, Inc.
Address: 12003 Oyster Road
City: Alliance
State Zip: OH 44601

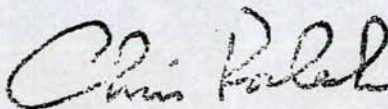
Person to Contact: Tom Johnson, General Manager
Telephone: 330-823-6220

Description of Proposed Source: Construction of Temporary Sedimentation Basins for Central Waste
Borrow Area A at 12003 Oyster Road, Smith Twp., Mahoning County

Issuance Date: November 17, 2009
Effective Date: November 17, 2009

The above named entity is hereby granted a permit to install for the above described source pursuant to Chapter 3745-42 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source of environmental pollutants will operate in compliance with applicable state and federal laws and regulations. Issuance of this permit does not constitute expressed or implied assurance that, if constructed or modified in accordance with those plans and specifications, the above described source of pollutants will be granted the necessary operating permits. This permit is granted subject to the following conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director
P.O. Box 1049
50 West Town Street, Suite 700
Columbus, OH 43216-1049

This permit shall expire if construction has not been initiated by the applicant within eighteen months of the effective date of this permit. By accepting this permit, the applicant acknowledges that this eighteen month period shall not be considered or construed as extending or having any effect whatsoever on any compliance schedule or deadline set forth in any administrative or court order issued to or binding upon the permit applicant, and the applicant shall abide by such compliance schedules or deadlines to avoid the initiation of additional legal action by the Ohio EPA.

The director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, examining records, or reports pertaining to the construction, modification, or installation of the above described source of environmental pollutants.

Issuance of this permit does not relieve you of the duty of complying with all applicable federal, state, and local laws, ordinances, and regulations.

Any well, well point, pit, or other device installed for the purpose of lowering the ground water level to facilitate construction of this project shall be properly abandoned in accordance with the provisions of this plan or as directed by the director or his representative.

Any person installing any well, well point, pit or other device used for the purpose of removing ground water from an aquifer shall complete and file a Well Log and Drilling Report form with the Ohio Department of Natural Resources, Division of Water, within 30 days of the well completion in accordance with the Ohio Revised code Section 1521.01 and 1521.05. In addition, any such facility that has a capacity to withdraw waters of the state in an amount greater than 100,000 gallons per day from all sources shall be registered by the owner with the chief of the Division of Water, Ohio Department of Natural Resources, within three months after the facility is completed in accordance with Section 1521.16 of the Ohio Revised Code. For copies of the necessary well log, drilling report, or registration forms, please contact:

Ohio Department of Natural Resources
2045 Morse Road Bldg. E
Columbus, OH 43229-6693
(614) 265-6717

The proposed wastewater disposal system shall be constructed in strict accordance with the plans and application approved by the director of the Ohio Environmental Protection Agency. There shall be no deviation from these plans without the prior express, written approval of the agency. Any deviations from these plans or the above conditions may lead to such sanctions and penalties as provided for under Ohio law. Approval of these plans and issuance of this permit does not constitute an assurance by the Ohio Environmental Protection Agency that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

This permit to install applies only to the wastewater disposal system listed above. The installation of drinking water supplies, air contaminant sources, or solid waste disposal facilities will require the submittal of a separate application to the director.

No liquids, sludges, or toxic or hazardous substances other than those set forth in the approved permit shall be accepted for disposal without the prior written approval of the Ohio Environmental Protection Agency.

Special Condition:

The construction report identified in Part 2.0 of the Stormwater Management Plan in Attachment F of the Permit To Install application must be stamped, signed and dated by an engineer certified and licensed by the state of Ohio.



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

May 12, 2009

RE: PRE-ACTIVITY NOTIFICATION
(SWIMS ID# 093501)
PROJECT: CENTRAL WASTE
BORROW AREA
LEVEL 1 REVIEW

Mr. Jim Stenborg
Central Waste Inc.
12003 Oyster Road
Alliance, Ohio 44601

Dear Mr. Stenborg:

On April 10 2007, the Director of Ohio EPA, pursuant to Ohio Revised Code (ORC) Section 6111.021 issued the Ohio General Permit for filling Category 1 and Category 2 Isolated Wetlands. The permit conditions can be reviewed on the Ohio EPA Web site at www.epa.state.oh.us/dsw/401/IWP.html#links.

The Isolated Wetland Permit Application that you submitted on March 17, 2009 was found to be complete and you may proceed with the above referenced project to impact 0.07 acre of one isolated wetland. Please note that you are required to abide by all of the provisions of the general permit, specifically the permit conditions listed in Part III and the mitigation requirements listed in Part IV. The on-site mitigation proposal for isolated wetland impacts includes the creation of 0.44 acre of wetlands off Martin Road, 3,000 feet northwest of Wetland E. A conservation easement or environmental covenant is required to protect the on-site mitigated area in perpetuity and must be finalized within 90 days from the issuance of this permit. Additional mitigation reports may be required after the issuance of this permit.

Per ORC Section 6111.022 (E) and Part V of the General Permit, the proposed filling of the isolated wetland must be completed within two years of the date of this permit. If you do not complete the filling within this two year period, you must submit a new pre-activity notice (PAN) to Ohio EPA.

If you have any questions, please contact me at (330) 963-1172

Sincerely,

Ed Wilk
401 Reviewer
Division of Surface Water

EW/mt

cc: Jonathan Demarest, Civil and Environmental Consultants, Inc.
Mike Smith, Ohio EPA, DSW, CO



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

December 26, 2007

RE: PRE-ACTIVITY NOTIFICATION
(SWIMS ID# 073236)
PROJECT: CENTRAL WASTE
DISPOSAL RAILROAD - ATF
LEVEL 1 REVIEW

Mr. John Hartings
TransLoad America, Inc.
3799 Johnson Road
Norton, OH 44203

Dear Mr. Hartings:

On April 10, 2007, the Director of Ohio EPA, pursuant to Ohio Revised Code (ORC) Section 6111.021 issued the Ohio General Permit for filling Category 1 and Category 2 Isolated Wetlands. The permit conditions can be reviewed on the Ohio EPA Web site at: www.epa.state.oh.us/dsw/401/IWP.html#links.

The Isolated Wetland Permit Application that you submitted on October 16, 2007, was found to be complete and you may proceed with the above referenced project to impact 0.10 acre of three isolated wetlands. Please note that you are required to abide by all of the provisions of the general permit, specifically the permit conditions listed in Part III and the mitigation requirements listed in Part IV. The on-site mitigation proposal for isolated wetland impacts includes the creation of 0.20 acre of wetlands in a cove area of Wetland A off Martin Rd. A conservation easement or environmental covenant is required to protect the on-site mitigated areas in perpetuity. Additional mitigation reports may be required after the issuance of this permit.

Corrective measures are required to prevent secondary impacts to Wetland G. To prevent a violation of the Wetland Narrative Criteria 3745-1-51, it is required to follow the storm water permit requirements for this project. You will be contacted by myself or Dan Bogoevski of this office to meet these conditions.

Per ORC Section 6111.022 (E) and Part V of the General Permit, the proposed filling of the isolated wetland must be completed within two years of the date of this permit. If you do not complete the filling within this two-year period, you must submit a new pre-activity notice (PAN) to Ohio EPA.

If you have any questions, please contact me at (330) 963-1172

Sincerely,

Ed Wilk
401 Reviewer
Division of Surface Water

EW/mt

cc: Neil Bossart, Civil and Environmental Consultants, Inc.
Mike Smith, Ohio EPA, DSW, CO
Dan Bogoevski, Ohio EPA, DSW, NEDO





DEPARTMENT OF THE ARMY
PITTSBURGH DISTRICT, CORPS OF ENGINEERS
WILLIAM S. MOORHEAD FEDERAL BUILDING
1000 LIBERTY AVENUE
PITTSBURGH, PA 15222-4186

REPLY TO
ATTENTION OF:

December 6, 2007

Operations Division
Regulatory Branch
2007- 289

Mr. John Hartings
Transload America, Inc.
12003 Oyster Road
Alliance, Ohio 44601

Dear Mr. Hartings:

I am referring to your Department of the Army Application submitted by Civil and Environmental Consultants, Inc., regarding your proposal to re-install railroad tracks in the existing right-of-way in Alliance, Mahoning and Stark Counties, Ohio. The project will impact 0.39 acre of jurisdictional wetlands and 0.10 acre of isolated wetlands. Wetland mitigation will be the creation of a minimum of 0.64 acres on-site

Activities associated with projects of this type are authorized by Nationwide Permit No. 14 (see enclosure), previously issued by the Corps of Engineers, for purposes of Section 404 of the Clean Water Act as published in the March 12, 2007 issue of the Federal Register.

Enclosed are copies of Nationwide Permit No. 14, the Nationwide Permit General Conditions, and the Ohio 401 Water Quality Certification Conditions. Adherence to these conditions will permit you to proceed with the proposed project. **Please Note**, the attached Compliance Certification Form must be signed and returned to this office upon completion of the proposed work.

The verification of this Nationwide Permit is valid until December 6, 2009, unless the Nationwide Permit is modified, suspended, or revoked. If project specifications are changed or work has not been initiated before December 6, 2009, please contact this office for further approval.

The issuance of this Nationwide Permit will not relieve you of the responsibility to obtain any other required state, local, or Federal authorizations. Although the Corps of Engineers does not regulate the isolated wetlands, the Ohio Environmental Protection Agency will regulate these wetlands.

If you have any questions, please contact Nancy Mullen at (412) 395-7170.

Sincerely,

SIGNED

Scott A. Hans
Acting Chief, Regulatory Branch

Enclosure

Copy Furnished:

✓ Mark Haibach
CEC

Laura Fay
OEPA

Compliance Certification Form

PERMIT NUMBER: 2007-289

NAME OF PERMITTEE: Transload America, Inc.

DATE OF ISSUANCE: December 6, 2007

Upon completion of the activity authorized by this permit and any mitigation required by the permit, sign this certification and return it to the following address:

U.S. Army Corps of Engineers
Pittsburgh District
Regulatory Branch, Room 2200
William S. Moorhead Federal Building
1000 Liberty Avenue
Pittsburgh, PA 15222-4186

Please note that your permitted activity is subject to compliance inspection by a U.S. Army Corps of Engineers Representative. If you fail to comply with this permit, you are subject to permit suspension, modification, or revocation.

I hereby certify that the work authorized by the above referenced permit has been completed in accordance with the terms and conditions of the said permit, and required mitigation was completed in accordance with the permit conditions.

Signature of Permittee