



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

**CERTIFIED MAIL**

APRIL 6, 2017

Ms. Nancy Osborn  
Policy Committee Chairperson  
Ottawa, Sandusky, Seneca SWMD  
1856 East Perry Street  
Port Clinton, Ohio 43452

**Re: Ottawa, Sandusky, Seneca SWMD  
Long Term Planning for Reg Entity  
Final Approval or Acknowledgement  
Solid Waste Management Planning  
Sandusky County  
SWMD362**

The Honorable Jim Sass  
President of Board of Directors  
Ottawa, Sandusky, Seneca SWMD  
315 Madison Street  
Port Clinton, Ohio 43452

**Subject: Ottawa, Sandusky, Seneca Joint SWMD Solid Waste Management  
District Solid Waste Management Plan Approval**

Dear Ms. Osborn and Commissioner Sass:

The Director of the Ohio Environmental Protection Agency (Director) has reviewed and approved the ratified draft solid waste management plan update (Plan) for the Ottawa, Sandusky, Seneca Joint Solid Waste Management District (District). Director's Final Findings and Orders approving the Plan are enclosed with this letter. Attachment 1 is a summary of the implementation schedule that was derived from the District's Plan.

With the update complete, the District should proceed to implement its approved Plan in accordance with the implementation schedule and timeline contained in the approved Plan and in Attachment 1 to the enclosed Director's Final Findings and Orders. Please be advised that Ohio Revised Code (ORC) Section 3734.55(C)(4) also requires the Policy Committee to "...annually review implementation of the approved plan... and report its findings and recommendations regarding implementation to the board of county commissioners or board of directors of the district."

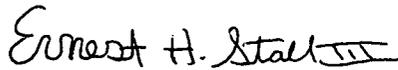
Additionally, you are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee

would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street  
17th Floor  
Columbus, Ohio 43215

If you have any questions regarding implementation of the approved Plan, please contact me at (614) 728-5356 or [ernest.stall@epa.ohio.gov](mailto:ernest.stall@epa.ohio.gov).

Sincerely,



Ernie Stall  
Environmental Specialist 3  
Division of Materials and Waste Management

EAS

Enclosures (2): Director's Final Findings and Orders  
Attachment 1 to the Findings and Orders

cc/ec (with enclosures): Tim Wasserman, Executive Director, Ottawa, Sandusky,  
Seneca Joint SWMD  
Mike Reiser, Supervisor, Ohio EPA, DMWM-NWDO

**BEFORE THE  
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the matter of:

Ottawa, Sandusky, Seneca Joint Solid Waste Management District 1875 E. State Street Fremont, Ohio 43420	: :	Director's Final Findings and Orders
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**I. JURISDICTION**

These Director's Final Findings and Orders (Orders) are issued to the Ottawa, Sandusky, Seneca Joint Solid Waste Management District (District), pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) Section 3734.55(C).

**II. PARTIES**

These Orders shall be binding upon the District.

**III. DEFINITIONS**

Unless otherwise stated, all terms used in these Orders shall have the same meanings as defined in ORC Chapter 3734 and the rules promulgated thereunder.

**IV. FINDINGS**

The director of Ohio EPA has determined the following findings:

1. Pursuant to ORC Section 3734.56, the policy committee of a solid waste management district (SWMD) with an approved solid waste management plan that contains a planning period of fifteen or more years is required to submit an amended solid waste management plan that complies with the requirements in Divisions (A), (B), (D), and (E)(1) of ORC Section 3734.53 to the director of Ohio EPA on or before the fifth year anniversary of the date the existing solid waste management plan was approved.
2. The District's existing solid waste management plan was approved on November 15, 2010 and covers a planning period of at least 15 years. The District's draft amended solid waste management plan was due to Ohio EPA on November 15, 2015.

3. On November 13, 2015, Ohio EPA received a draft amended solid waste management plan from the District's Policy Committee.
4. Pursuant to ORC Section 3734.55, the director of Ohio EPA is required to provide the policy committee of a SWMD with a written, nonbinding advisory opinion regarding a draft solid waste management plan and any recommended changes to it that the director considers necessary to effect its approval.
5. On December 21, 2015, Ohio EPA mailed a written, nonbinding advisory opinion concerning the draft amended solid waste management plan received on November 13, 2015 to the District's Policy Committee.
6. Pursuant to ORC Section 3734.55, the policy committee of a SWMD is required to submit a draft solid waste management plan that was ratified in accordance with the criteria established in Division (B) of ORC Section 3734.55 to the director of Ohio EPA to be reviewed for compliance with Divisions (A), (B), (D), and (E)(1) of ORC Section 3734.53.
7. On February 14, 2017, Ohio EPA received a ratified, draft, amended solid waste management plan from the District's Policy Committee.
8. The director has determined that the District's ratified, draft, amended solid waste management plan is in compliance with Divisions (A), (B), (D), and (E)(1) of Section 3734.53 of the ORC.

#### **V. ORDERS**

1. The District's ratified, draft, amended plan that was received by Ohio EPA on February 14, 2017 is hereby approved.
2. The District shall proceed to implement its approved solid waste management plan in accordance with the strategies, programs, and activities described in the ratified, draft, amended solid waste management plan and contained in the implementation schedule included as Attachment 1 to these Orders.

## VI. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations.

## VII. RESERVATION OF RIGHTS

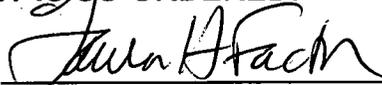
Nothing contained herein shall be construed to prevent Ohio EPA from seeking legal or equitable relief to enforce the terms of these Orders or from taking other administrative, legal, or equitable action as deemed appropriate and necessary, including seeking penalties against the District for noncompliance with these Orders.

Nothing contained herein shall be construed to prevent Ohio EPA from exercising its lawful authority to require the District to perform additional activities pursuant to ORC Chapter 3734 or any other applicable laws in the future. Nothing herein shall restrict the right of the District to raise any administrative, legal, or equitable claim or defense with respect to such further actions which Ohio EPA may seek to require of the District. Nothing in these Orders shall be construed to limit the authority of Ohio EPA to seek relief for violations which may occur.

## VIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders were entered into the Ohio EPA Director's Journal.

**IT IS SO ORDERED:**

  
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Craig W. Butler, Director  
Ohio Environmental Protection Agency

**ATTACHMENT 1 TO THE FINDINGS AND ORDERS**  
**Summary of the Implementation Schedule for the**

**Ottawa, Sandusky, Seneca Joint Solid Waste Management District**

Several sections of the ratified, draft amended solid waste management plan update (Plan) submitted by the Solid Waste Management District or Authority identified above are considered to be part of the implementation schedule required in accordance with Ohio Revised Code Section 3734.53(A)(13). This attachment lists the elements that Ohio EPA understands to constitute the implementation schedule contained in the District's or Authority's Plan. These elements are listed in the table below.

**Implementation Schedule for Facilities, Strategies, Programs and Activities**

1. Elements of the Plan	2. According to the Plan, when will implementation of this strategy begin and end?	3. Which Goal will this strategy be used to demonstrate compliance with?
<b>Commercial/Industrial Sector TA and Education</b>		
7997 Provide technical assistance and waste assessments to the commercial and industrial sectors upon request.	existing, ongoing	Goal 3 Goal 4
9729 Recycling Program Development - work with chambers of commerce and economic development corporation offices in each county on programs to benefit local business and industry.	2017, 2031	Goal 3 Goal 4
<b>Curbside Recycling, Non-subscription</b>		
2431 Ottawa County, Clay Center Village	existing, ongoing	Goal 1 Goal 2
2433 Ottawa County, Elmore Village	existing, ongoing	Goal 1 Goal 2
2432 Ottawa County, Genoa Village	existing, ongoing	Goal 1 Goal 2
2435 Ottawa County, Oak Harbor Village	existing, ongoing	Goal 1 Goal 2
2434 Ottawa County, Port Clinton City	existing, ongoing	Goal 1 Goal 2
2429 Sandusky County, Fremont City	existing, ongoing	Goal 1 Goal 2
2438 Sandusky County, Gibsonburg Village	existing, ongoing	Goal 1 Goal 2
2440 Sandusky County, Woodville Village	existing, ongoing	Goal 1 Goal 2
2444 Seneca County, Tiffin City PAYT	existing, ongoing	Goal 1 Goal 2

1. Elements of the Plan	2. According to the Plan, when will implementation of this strategy begin and end?	3. Which Goal will this strategy be used to demonstrate compliance with?
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**Curbside Recycling, Subscription**

9770 Sandusky County, Bellevue City	existing, ongoing	Goal 1 Goal 2
2439 Sandusky County, Lindsey Village	existing, ongoing	Goal 1 Goal 2

**Drop-off Recycling**

9722 Developing a Partnership for Drop-off Management - create a partnership with a local non-profit to assist with housekeeping and promotion at targeted high-use drop-off sites	2017, 2017	Goal 1 Goal 4
9723 Implementation of Partnership Management Program - based on adequate participation from local non-profit organizations, will implement the program	2018, status to be evaluate in 2021	Goal 1 Goal 4

**Drop-off Recycling, FS, Rural**

2452 Ottawa County, Allen Township	existing, ongoing	Goal 1 Goal 2
2453 Ottawa County, Bay Township	existing, ongoing	Goal 1 Goal 2
2454 Ottawa County, Benton Township	existing, ongoing	Goal 1 Goal 2
2455 Ottawa County, Carroll Township	existing, ongoing	Goal 1 Goal 2
2465 Ottawa County, Catawba Township	existing, ongoing	Goal 1 Goal 2
2451 Ottawa County, Erie Township	existing, ongoing	Goal 1 Goal 2
2459 Ottawa County, Harris Township	existing, ongoing	Goal 1 Goal 2
2461 Ottawa County, Portage Township	existing, ongoing	Goal 1 Goal 2
2463 Ottawa County, Salem Township	existing, ongoing	Goal 1 Goal 2
7938 Sandusky County, Ballville Township - CCC Recycling Center	existing, ongoing	Goal 1 Goal 2
9771 Sandusky County, Ballville Township, Hydraulic Park	existing, ongoing	Goal 1 Goal 2
4788 Sandusky County, Bellevue/York Township, GORDON LUMBER	existing, ongoing	Goal 1 Goal 2
2467 Sandusky County, Green Creek Township	existing, ongoing	Goal 1 Goal 2

1. Elements of the Plan	2. According to the Plan, when will implementation of this strategy begin and end?	3. Which Goal will this strategy be used to demonstrate compliance with?
9719 Sandusky County, Helena Village	existing, ongoing	Goal 1 Goal 2
2470 Sandusky County, Jackson Township	existing, ongoing	Goal 1 Goal 2
2471 Sandusky County, Madison Township	existing, ongoing	Goal 1 Goal 2
2472 Sandusky County, Rice Township	existing, ongoing	Goal 1 Goal 2
2473 Sandusky County, Riley Township	existing, ongoing	Goal 1 Goal 2
2480 Sandusky County, Scott Township	existing, ongoing	Goal 1 Goal 2
9718 Sandusky County, Townsend Township	existing, ongoing	Goal 1 Goal 2
2478 Sandusky County, Woodville Township	existing, ongoing	Goal 1 Goal 2
2483 Seneca County, Adams Township	existing, ongoing	Goal 1 Goal 2
3858 Seneca County, Attica Village/Venice Township	existing, ongoing	Goal 1 Goal 2
9772 Seneca County, Bettsville Village	existing, ongoing	Goal 1 Goal 2
2500 Seneca County, Big Springs Township	existing, ongoing	Goal 1 Goal 2
2485 Seneca County, Bloom Township	existing, ongoing	Goal 1 Goal 2
2497 Seneca County, Clinton Township	existing, ongoing	Goal 1 Goal 2
2487 Seneca County, Eden Township	existing, ongoing	Goal 1 Goal 2
3859 Seneca County, Hopewell Township	existing, ongoing	Goal 1 Goal 2
2489 Seneca County, Jackson Township	existing, ongoing	Goal 1 Goal 2
2498 Seneca County, Liberty Township	existing, ongoing	Goal 1 Goal 2
7940 Seneca County, Loudon Township	existing, ongoing	Goal 1 Goal 2
2492 Seneca County, Pleasant Township	existing, ongoing	Goal 1 Goal 2

1. Elements of the Plan	2. According to the Plan, when will implementation of this strategy begin and end?	3. Which Goal will this strategy be used to demonstrate compliance with?
9773 Seneca County, Reed Township	existing, ongoing	Goal 1 Goal 2
2499 Seneca County, Scipio Township	existing, ongoing	Goal 1. Goal 2
2494 Seneca County, Thompson Township	existing, ongoing	Goal 1 Goal 2
<b>Drop-off Recycling, FS, Urban</b>		
2456 Ottawa County, Clay Township	existing, ongoing	Goal 1 Goal 2
2457 Ottawa County, Danbury Township	existing, ongoing	Goal 1 Goal 2.
7936 Ottawa County, Port Clinton	existing, ongoing	Goal 1 Goal 2
7942 Seneca County, Kohart Recycling	existing, ongoing	Goal 1 Goal 2
<b>Drop-off Recycling, PT, Rural</b>		
9717 Ottawa County, Put-In-Bay Township	existing, ongoing	Goal 1, Goal 2
2477 Sandusky County, Washington Township	existing, ongoing	Goal 1 Goal 2
<b>Electronics Collection</b>		
7979 Hold two annual electronics collection events in each District county	existing, ongoing	Goal 2
8009 Reviewing practices of electronics recyclers contracted by district	2014, ongoing	Goal 4 Goal 5
<b>Grants/Funding</b>		
7984 City and Village Funding - provide funding to local governments to enhance or expand solid waste programs or to purchase recycled content products	existing, ongoing	N/A
8011 Competitive Funding provide financial assistance to local governments, educational institutions, and non-profit organizations for solid waste programs. Grants are competitive and awarded twice a year.	existing, ongoing	N/A
<b>Health Dept. Funding/Open Dumps</b>		
7987 Health Department Financial Support - provide financial support to health departments located in Sandusky and Seneca counties	existing, ongoing	N/A

1. Elements of the Plan	2. According to the Plan, when will implementation of this strategy begin and end?	3. Which Goal will this strategy be used to demonstrate compliance with?
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**Household Hazardous Waste**

7974 District will continue to host two annual HHW collection events in each District county	existing, ongoing	Goal 2 Goal 5
7975 Promoting Reduction of Household Hazardous Waste Generation - aim to reduce the amount of usable material collected from the HHW program	2017, ongoing	Goal 5

**Lead-Acid Battery Programs**

2538 Accept lead-acid batteries at the HHW collection events, promote LAB recycling by distributing with static stickers to retailers that accept LABs, and post list of businesses that recycling LABs on website	existing, ongoing	Goal 5
9725 Battery Handling Procedure - add to website specific procedures for the safe handling and transportation of LABs to collection sites	2018, 2018	Goal 5
7977 Battery Survey - add a special battery survey instrument targeted to the businesses that accept batteries and are listed on the website. District will administer the surveys biannually	2017, 2017	Goal 5

**Litter Prevention/Clean-Up**

7991 AAR Compliance Program - if groups do not meet program requirements by third notification, the adopting group's signs will be removed and the existing contract will be null and void until cleanups performed.	2017, 2031	N/A
7990 Adopt-A-Road - conduct orientation and safety instruction for adopting groups upon request. District will provide supplies and upon request collect and properly dispose of litter/debris.	existing, ongoing	N/A
7989 Beach and River Clean-ups - Continue to support these programs by promoting them on website and social media accounts. District will also provide supplies	existing, ongoing	N/A
7988 Continue to contract with each county juvenile court to provide labor for litter collection activities throughout each District county. Crews will sort recyclables from waste. District will also provide supplies	existing, ongoing	N/A

**Market Development Programs**

7981 Recycling Market Development Grant - identify and contact industries that may be candidates for a grant. Technical assistance for preparing grant application is provided to qualified interested candidates	existing, ongoing	Goal 7
9727 Targeted Market Development Grant Program - promote the opportunity on website and in publications and develop list of potential commercial and industrial businesses that could be directly targeted to participate	2017, 2031	Goal 7

1. Elements of the Plan	2. According to the Plan, when will implementation of this strategy begin and end?	3. Which Goal will this strategy be used to demonstrate compliance with?
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**MRFs**

9726 Recycling Center Feasibility Evaluation - evaluate options for the recycling center during the planning period, including options to relocate the center closer to the District office or options to house both together	2017, 2031	NA
4806 The District will continue to operate the in-district MRF, the CCC Camp	existing, ongoing	Goal 2

**Other Programs**

9720 Curbside Program Contract Management - work with curbside recycling communities that have contracts with haulers to make improvements	2017, 2017	Goal 4
7994 Disaster Debris Management - continue to maintain a comprehensive disaster debris management manual for each county. Training on the manual may be conducted on an as-needed basis.	existing, ongoing	N/A
7983 District will annually develop a list of potential municipalities, villages, townships and non-profit organizations that can be targeted for promotion of the Competitive Funding Program directly (page VI-25 of Plan Update)	2010, ongoing	Goal 3 Goal 4
7982 Program Promotion - promote the competitive funding program on website and through other publications as well as develop a list of potential grantees that could be directly targeted	2018, ongoing	Goal 3 Goal 4
7973 Promote disaster debris management program through printed materials and District web site (pages V-17 and VI-23 of Plan Update)	2010, ongoing	N/A
7995 Regional Disaster Plan Review - evaluate other Ohio solid waste district disaster debris management plans and policies to determine if any improvements can be made	2018, 2019	N/A
7996 Strategic Planning - Complete an annual SWOT analysis of programs, initiatives, and infrastructure. District will also identify its cooperative partners that assist with implementation of its programs	existing, ongoing	N/A
9721 Targeting Communities with Expiring Contracts - the District will target each community that has a contract ending within 8 months and begin working with the procurement office of the community	2017, ongoing	Goal 4
7946 Work with communities to reinstate curbside recycling programs	existing, ongoing	Goal 1 Goal 4

**Other Residential/Commercial Recycling**

9731 Container Late Fee - revise the container loan policy to include a late fee	2018, 2018	N/A
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1. Elements of the Plan	2. According to the Plan, when will implementation of this strategy begin and end?	3. Which Goal will this strategy be used to demonstrate compliance with?
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9730 Container Loan - community groups, government offices, and non-profit organizations can borrow recycling containers for special events. The District will provide lids, labels, and clear bags.	existing, ongoing	Goal 2
7978 Hold at least one annual appliance collection event in each District county	existing, ongoing	Goal 2
9733 Medication Take-Back - permanent drop-off sites in local law enforcement agencies for residents to dispose of outdated, unwanted and unused prescription medications	existing, ongoing	N/A
9732 Special Event Recycling Kit - develop a special event recycling kit designed to assist event coordinators that may use District containers.	2019, 2020	N/A

**Residential Sector Education and Awareness**

8001 Continue education and awareness program mainly operated by three program specialists.	existing, ongoing	Goal 3 Goal 4
7962 Curbside Recycling Program Promotion - implement targeted promotional activities to residents that have curbside recycling	2017, 2022	Goal 4
7992 Needle Disposal Program - Continue educational campaign to educate residents on proper needle disposal through website, social media, and fliers	existing, ongoing	Goal 3 Goal 4
9728 Pro-Bono Environmental Educators - evaluate feasibility of a partnership with local colleges to train student teachers to conduct District recycling presentations in exchange for school credit.	2019, 2020	Goal 3 Goal 4
7993 Proper Needle Disposal Awareness- expand education and awareness of proper needle disposal	2017, 2031	Goal 3 Goal 4
8006 Web Site	existing, ongoing	Goal 3 Goal 4

**Scrap Tire Programs**

2532 The District will continue to host an annual scrap tire collection event in each District county and one annual farm tire collection event	existing, ongoing	Goal 5
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**Yard Waste Programs**

7970 Yard waste management activities at registered compost sites and political subdivisions are expected to continue.	existing, ongoing	Goal 2 Goal 5
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