Ohio Environmental Protection Agency

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

SEPTEMBER 19, 2017

Re: Nelson Ledges Road Course
Director's Authorization
Approval
Beneficial Use
Portage County
ST021282

Brian Ross
NRLC, LLC
Brian Ross Racing, LLC
1990 Niles-Cortland Road
Cortland, Ohio 44410

Ohio EPA SEP 19 '17
Entered Directors Journal

Subject: Nelson Ledges Road Course – Scrap Tire Beneficial Use Approval

Dear Mr. Ross:

On March 27, 2017, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO) received a request from ENVi Environmental, LLC on behalf of NLRC, LLC ("NLRC") to beneficially use scrap tires at the property located at Nelson Ledges Race Course, 10342 State Route 305, Garrettsville, Portage County, parcel no. 25-047-01-00-008-000 (the Property).

The request was submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-27-78(F), which requires that the Director of Ohio EPA (Director) approve scrap tire beneficial use projects that are not specifically authorized in OAC Rules 3745-27-78(D) and (E). In the request, NLRC proposes to use approximately 165,000 scrap tires as crash barriers for the race track at the Property. The scrap tires are already in place.

After reviewing the request, I have determined that the project plan meets the applicable Ohio EPA requirements. Therefore, pursuant to OAC Rule 3745-27-78(F) and ORC 3745.01, I hereby approve your project plan for the beneficial use of scrap tires at the Property.

As part of this authorization, NLRC is subject to the following conditions:

CONDITIONS

1. This authorization shall apply to and be binding upon NLRC, LLC and all agents, lessees, managers, assigns, and successors in interest liable under Ohio law, including Brian Ross Racing LLC ("Brian Ross Racing") which is the current manager of the Property.

2. This beneficial use authorization authorizes NLRC to beneficially use scrap tires solely for the purpose of the crash barrier on the Property, in accordance with the conditions contained herein.

3. Prior to NLRC's purchase of the Property, Brian Ross Racing is also authorized, as current manager of the Property, to beneficially use scrap tires solely for the purpose of the crash barrier on the Property, in accordance with the conditions contained herein.

4. This authorization shall terminate if NLRC fails to take title ownership of the Property by December 31, 2019.

5. This authorization shall terminate prior to December 31, 2019 if NLRC or Brian Ross Racing provides written notice to Ohio EPA that NLRC has decided not to purchase the Property. Such notice shall be provided to Ohio EPA not later than 14 days after the decision not to purchase is communicated to the current owner of the Property.

6. Brian Ross Racing and NLRC shall comply with the attached Nelson Ledges Scrap Tire Beneficial Use Project Plan (Project Plan), fully incorporated by reference into this authorization, and marked as attachment A.

7. Brian Ross Racing and NLRC shall not accept or place new scrap tires generated from off Property on to the Property. Any scrap tires removed from vehicles on the Property and stored at the Property shall be stored in accordance with the storage provisions specified in attachment A until being incorporated into the crash barrier.

8. Brian Ross Racing and NLRC shall implement the mosquito control activities in accordance with the mosquito control plan identified in the Project Plan, attachment A. During the months of April through October, mosquito season in Portage County, NLRC shall implement the mosquito control plan and submit monthly reports to Ohio EPA and the Portage County Health Department regarding implementation of the mosquito control plan. If daytime temperatures during November through March are consistently above 50 degrees, Brian Ross Racing and NLRC shall place Gravid Traps in accordance with attachment A and will treat the scrap tires in accordance with the mosquito control plan if the traps have a count of fifty mosquitos or more.

9. Upon proper identification, the Director or his authorized representative, or the employees of the Portage County Health Department, may enter the Property at reasonable hours to monitor compliance with this approval.

10. If Brian Ross Racing or NLRC removes scrap tires from the Property, then either Brian Ross Racing or NLRC shall transport scrap tires in excess of 10 by a registered scrap tire transporter, and shall send them to a scrap tire facility licensed under ORC Section 3734.81 in Ohio, or to a facility in another state operating in compliance with the laws of the state in which it is located.

11. Following the purchase of the Property, NLRC shall provide written notice to Ohio EPA not later than 14 days after NLRC ceases the beneficial use of the scrap tires as a crash barrier at the Property in accordance with this authorization.

12. Not later than 60 days after providing notice in accordance with Condition Number 11, NLRC shall complete removal, transportation and disposal of all scrap tires located on the Property to an authorized scrap tire facility in accordance with Ohio EPA's scrap tire regulations.

13. On or before July 1, 2021, NLRC shall establish a trust, in accordance with the wording requirements of OAC Rule 3745-27-17(A), except that the language:

    In Section 2 shall be replaced with "the agreement shall pertain to NLRC;" and

    In Section 4 shall provide that payment shall be for the costs of "the removal, transportation, recovery, processing, and disposal of the scrap tires from the Property," in lieu of the language set forth in rule which refers to "solid waste facility closure, post-closure, and corrective measures" or "scrap tire transporter final closure."

14. NLRC shall establish and maintain financial assurance in the form of a Trust or a Surety Bond with a standby trust in an amount not less than $400,000 to fully fund financial assurance to remove and properly dispose of the approximately 165,000 scrap tires from the Property ("Minimum Financial Assurance") in accordance with one of the following schedules:

    a. On or before July 1, 2021, NLRC shall fund the trust specified in Condition Number 13 initially in the amount of $100,000. Thereafter, NLRC shall fund the trust in the amount of $100,000 annually on July 1, 2022, 2023, and 2024 until a minimum of $400,000 is deposited into the trust fund; or

    b. Alternatively, on or before July 1, 2021, NLRC shall establish financial assurance in the form of a surety bond in the amount of $400,000, worded in accordance with OAC Rule 3745-27-17(B), except that the following language shall be used in lieu of "solid waste facility" and "scrap tire transporter": "NLRC's Beneficial Use of Scrap Tires."

       The terms of the surety bond shall provide that all payments made thereunder will be deposited by the Surety directly into the standby trust fund specified in Condition Number 13 in accordance with instructions from the director.

15. If NLRC provides financial assurance in accordance with Condition Number 14.a. on or by July 21, 2021, then NLRC may thereafter request approval from the Director to substitute a surety bond for all or a portion of the amount funded in the trust, as long as a minimum of $400,000 in financial assurance is maintained. Upon providing a Surety Bond as alternative financial assurance, NLRC may request that the Director release from the Trust, any amount of funds in excess of the Minimum Financial Assurance. If NLRC reduces the total number of scrap tires used as a crash barrier below 165,000 scrap tires, NLRC may request the Director approve a reduction of the Minimum Financial Assurance in amount that is adequate to cover the costs of the proper removal and disposal of scrap tires located on the Property.

16. As specified above in Condition Number 14, in addition to the liability terms of the Bond in OAC Rule 3745-27-17, NLRC shall ensure that under the terms of the Bond, the

Surety becomes liable on the Bond, and that under the Terms of the Trust the Director may withdraw from the Trust, upon any of the following occurrences:

a. NLRC fails to remove all scrap tires from the Property in accordance with Condition Number 12;

b. NLRC transfers the Property to a new owner who does not receive approval of a beneficial use authorization, accompanied by proof of adequate financial assurance to fund the costs of the proper removal and disposal of the scrap tires located on the Property, within 60 days of the transfer of ownership; or

c. The Director revokes this authorization in accordance with Condition Number 20;

17. Under the terms of the Bond, a Bond established in accordance with Condition 14.b. shall remain in force unless the Surety sends written notice of cancellation by certified mail or any other form of mail accompanied by a receipt to NLRC and to the director. Cancellation cannot occur, however, during the one hundred twenty day period beginning on the first day that both NLRC and the Director have received the notice of cancellation, as evidenced by the return receipts. The terms of the Bond shall guarantee that the Surety shall become liable on the bond obligation unless NLRC provides alternate financial assurance, and obtains the director's written approval of the alternate financial assurance provided, not later than ninety days after both NLRC and the Director receive notice of cancellation of the bond from the Surety.

18. NLRC may request a release of the financial assurance, and termination of this Beneficial Use authorization, after the Director's issuance of an authorization to a new Owner, and after the Director's determination that the financial assurance is adequately funded to cover the costs of the proper removal and disposal of the scrap tires located on the Property.

19. This scrap tire beneficial use authorization may be modified by agreement of the parties hereto. Modifications to this scrap tire beneficial use authorization shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

20. This authorization may be revoked as a final action of the Director which may be appealed to ERAC upon the occurrence of any of the following events:

a. **Failure to Adhere to the Mosquito Control Plan**. If Brian Ross Racing or NLRC fails to comply with the mosquito control plan in Attachment A, Ohio EPA shall provide written notice to Brian Ross Racing or NLRC at minimum, by certified mail of the non-compliance. Brian Ross Racing or NLRC shall correct any issue identified in the written notice within seven (7) days. If not corrected, Ohio EPA may revoke the scrap tire beneficial reuse authorization;

b. **Failure to Adhere to Fire Prevention Measures in Project Plan.** If Brian Ross Racing or NLRC fails to comply with the fire prevention measures in the Project Plan set forth in Attachment A, Ohio EPA shall provide written notice to Brian Ross Racing or NLRC at minimum, by certified mail of the non-compliance. Brian Ross Racing or NLRC shall correct any issue identified in the written notice

within seven (7) days. If not corrected, Ohio EPA may revoke the scrap tire beneficial reuse authorization;

c. **Failure to Adhere to the Financial Assurance Payment Schedule.** If NLRC fails to make timely payments according to the schedule in Condition 14 above, Ohio EPA shall provide written notice to NLRC at minimum, by certified mail of the non-compliance. NLRC shall have thirty (30) days from receipt of the written notice to make payment. If proper payment is not made, Ohio EPA may revoke the scrap tire beneficial reuse authorization.

21. In the event that Brian Ross Racing or NLRC fails to comply with this authorization, Brian Ross Racing and NLRC agree to grant access to the Property to Ohio EPA, its authorized representatives and contractors for such actions as are necessary or appropriate for the purpose of removing and disposing of scrap tires located on the Property, and spraying for mosquitoes. NLRC hereby agrees to relinquish any claim of ownership interest in any scrap tires that are removed by Ohio EPA, its authorized representatives or contractors from the Property. Brian Ross Racing and NLRC also hereby agree to grant access to Ohio EPA, its authorized representatives or contractors to improve existing, or build necessary roads on, over, and across the Property for the purpose of removal of scrap tires disposed at the Property. At the conclusion of any cleanup of any scrap tires from the Property by Ohio EPA, its authorized representatives or contractors, NLRC agrees that all improvements shall attach to the Property.

    The consent for Ohio EPA access shall remain in full force and effect until all necessary and appropriate preventive and/or corrective action has been completed at the Site by Ohio EPA, its contractors, and its authorized representatives. Ohio EPA may utilize the established financial assurance to perform such necessary and appropriate preventative or corrective actions

22. Nothing in this authorization shall be construed to authorize any waiver from the requirements of any applicable federal or state laws or regulations. This letter shall not be interpreted to release Brian Ross Racing or NLRC from responsibility under Ohio Revised Code (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. Nothing in this authorization shall be construed to prevent the Director from seeking legal or equitable relief to abate nuisance conditions or prevent adverse effects on public safety, health or the environment. Nothing in this letter shall be construed to limit the authority of the Director to seek relief for violations which may occur at the Property. Nothing herein shall restrict the right of Brian Ross Racing or NLRC to raise any administrative, legal, or equitable claim or defense with respect to such further actions that the Director may seek to require of NLRC.

23. Brian Ross Racing and NLRC consent to the issuance of this Scrap Tire Beneficial Use Authorization and agrees to comply with this Scrap Tire Beneficial Use Authorization. Brian Ross Racing and NLRC hereby waives the right to appeal the issuance, terms and conditions, and service of this Scrap Tire Beneficial Use Authorization, and hereby waives any and all rights Brian Ross Racing and/or NLRC may have to seek administrative or judicial review of this Scrap Tire Beneficial Use Authorization either in

law or equity. Notwithstanding the preceding, Ohio EPA and Brian Ross Racing and NLRC agree that if this Scrap Tire Beneficial Use Authorization is appealed by any other party to the Environmental Review Appeals Commission, or any court, Brian Ross Racing and NLRC retain the right to intervene and participate in such appeal. In such an event, Brian Ross Racing and NLRC shall continue to comply with this Scrap Tire Beneficial Use Authorization notwithstanding such appeal and intervention unless this Scrap Tire Beneficial Use Authorization is stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of this Scrap Tire Beneficial Use Authorization is the date this Scrap Tire Beneficial Use Authorization is entered into the Ohio EPA Director's Journal.

ORDERED AND AGREED:

Environmental Protection Agency
Craig W. Butler, Director

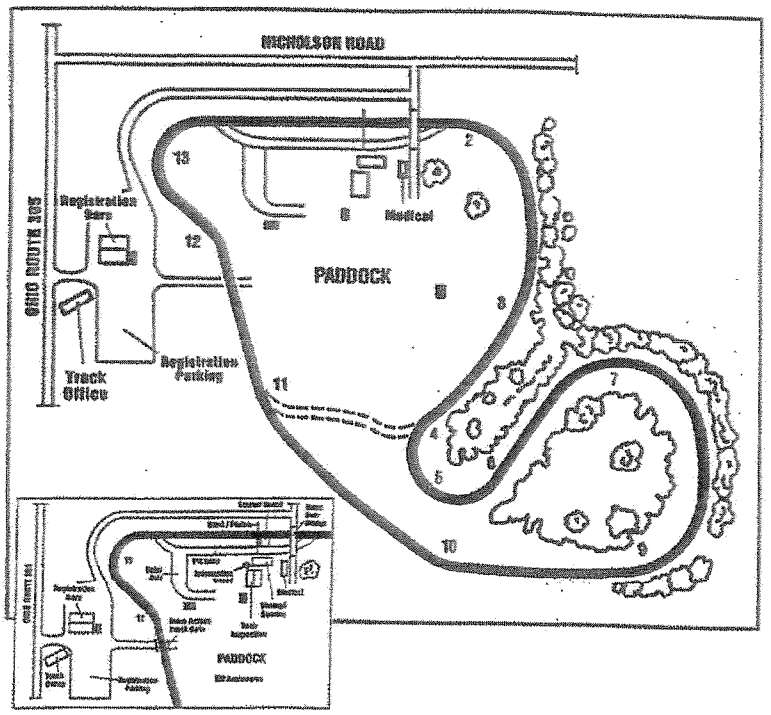
AGREED:

NLRC, LLC — 8/24/17 Date

Brian Ross Racing, LLC — 8/24/17 Date

Attachment A

Nelson Ledges Scrap Tire Beneficial Reuse Application



I. Overview

This letter constitutes the request of NLRC, LLC, an Ohio limited liability corporation ("NLRC"), on behalf of Nelson Sports, Inc., ("Owner"), owner of the captioned property, for authorization of the beneficial use of scrap tires at the captioned property described below.

The proposed beneficial use of the scrap tires is the continued use as Crash Barriers for the race track. While the use of scrap tires as a crash barrier is an authorized beneficial use of scrap tires (OAC 3745-27-78(D)(1)(a)), the quantity of tires required at the subject site exceeds 1,500 scrap tires, requiring this Beneficial Use application pursuant to OAC 3745-27-78(F) .

II. Applicant Information

Name: Mr. Brian Ross
Company: NLRC, LLC
Address: 1990 Niles-Cortland Road, Cortland, Ohio 44410
Phone Number: (330) 856-7792

III. Location of Scrap Tire Beneficial Use Site

Site Name: Nelson Ledges Race Course
Address: 10342 State Route 305, Garrettsville, Portage County, Ohio 44231
Coordinates: 41 18' 33.76" N
81 00' 57.73" W

Nelson Ledges Road Course is an asphalt facility that is located on 160 acres and is currently 2.01 miles long.

IV. Property Owner Information

Name: Mr. Marvin Drucker
Company: Nelson Sports, Inc.
Address: 27500 Cedar Road, Suite 704, Beachwood, Ohio 44122
Phone Number: (216) 771-5356

NLRC, LLC, has an option to purchase the property.

V. Plan View Drawing

Please see attached Site Plan which meets the requirements under OAC 3745-27-78(G)(4). The Site Plan details where NLRC plans to beneficially use scrap tires around the racetrack as crash barriers.

VI. Estimates of Maximum Amount of Tires to be Used for Project

Based upon an estimate performed by Aerocon, there are currently 165,000 passenger car tires on the site. See attached spreadsheet in Appendix C.

VII. Setbacks & Sensitive Areas

The Nelson Ledges Race Course (Beneficial Use project area) is not located in a regulatory floodplain. The closest regulatory flood plain to the property is 0.9 miles southeast; east of Nicholson Road. Wetland area and area tributaries/ditches are reflected on the enclosed mapping. Please see Appendix A.

The following Parks and Preserves are located within the vicinity of the Subject Property but are greater than 1,000 feet of the Beneficial Use Project Area:

Park/Preserve	Address	Distance (miles)
Nelson Ledges Quarry State Park	12440 OH 282 – Garrettsville	1.22 NW
Nelson Ledges Quarry Park	12001 Nelson Ledges Rd Garrettsville	1.80 NW
Eagle Creek- State Preserve	11027 Hopkins Road - Garrettsville	2.58 SW
Kool Lake Family Campground	12990 Nelson Ledges Rd - Garrettsville	2.85 N
Travelers Woods	11922 Brosius Rd – Garrettsville	3.00 W

VIII. Detailed Description of Beneficial Use of Scrap Tires

History of Use of Scrap Tires at Nelson Ledges

Nelson Ledges Road Course was founded in 1958. It is one of the oldest racetracks in the Country. The small regional track attracted local club racers from Cleveland, Akron, Pittsburgh, and Columbus. These club racers would spend weekends participating in different automobile and motorcycle events.

Over the years, Nelson Ledges was expanded to a two mile course and has been as one of the fastest tracks in North America. In previous years, the track hosted some of the biggest and most respected racing events in the country such as the "Longest Day of Nelson" and the grueling "24-hour Motorcycle Race of Nelson Ledges." At one point, Le Mans and Nelson Ledges were the only 24-hour motorcycle races in the world. Nelson has a long list of well-known drivers who competed in the glory days of racing such as Paul Newman, Steve McQueen, Hurley Haywood, Mario Andretti, Michael Galati, Peter Gregg, and John Greenwood.

Nelson Ledges Road Course has been operating continuously for the last 58 years. NLRC, LLC and/or an affiliated entity has operated the racetrack since 2016 with small local events. At the present, Nelson Ledges has fallen into extreme disrepair. A substantial investment needs to be put into the track to make it marketable again and attract significant events.

Beneficial reuse of the scrap tires serves two purposes: 1) as discussed below, the scrap tires have been a highly effective crash barrier; and 2) continued use of the tires as a crash barrier will allow funds to be directed toward the significant improvements needed at the track.

The history of the tire wall goes back to the late summer of 1973 when tires were added for a safety measure. Nelson Ledges was the first racetrack to use tires as a safety tool. This safety measure has now evolved to every racetrack in the world.

Through the years people have tried to experiment with different materials for barriers, most commonly cement and guardrail. Both of these have increased damage to motor vehicles. More importantly, a barrier made of cement or guardrail increases the chance of injury to all motor enthusiasts, especially those on motorcycles. Cement barriers work well for small tracks with slow speeds but Nelson Ledges is too quick for this kind of barrier. Cement creates a much stronger impact and does not absorb the force as compared with tires.

Motorcycle events have a strong presence in Northeast Ohio. When a motorcyclist loses control, his/her limbs often go under the guardrail, which causes serious injury or the possibility for the loss of limbs. Guardrails also have the risk of creating more injury if a person catches the end of the rail. Racetracks around the world, such as NASCAR, have spent millions of dollars to provide a safe environment for people to participate. The common theme among these safest and most versatile racetracks is the use of the original tire wall.

NLRC, LLC is confident that if Nelson Ledges were to use cement or guardrails as a barrier, it would discourage use by many safety-concerned motor enthusiasts and the risk of injury will be substantially higher. The purpose of the scrap tires in the crash barrier is to present a safe, controlled, and suitable environment for motorsport enthusiasts to enjoy, practice and learn the sport of racing. [*Please see Appendix F* for pictures and additional information related to the history of the tire crash barrier at Nelson Ledges]

Current and Proposed Continued Use of Tires as a Crash Barrier

The beneficial use of the scrap tires currently located on Nelson Ledges Race Course is for Crash Barriers along the interior and exterior of the race track. These crash barriers protect track employees, emergency personnel and spectators in the event that a race vehicle leaves the race surface due to an accident, driver error or mechanical malfunction.

The crash barriers extend around approximately 80% of the race track and are located on both the interior and exterior of the track in most cases. A typical crash barrier section is three -to-four tires high by three rows deep.

The majority of the crash barrier consists of "woven" tire stacks, while some portions consist of loosely stacked tires; however, both configurations prove to be effective in terms of their intended beneficial use – that is, the use of scrap tires to slowly absorb energy compared to a rigid steel guardrail or concrete barrier.

There are seventeen Fire Breaks that are 20-feet or greater along the tire barrier. There are additional Fire Breaks that are less than 20-feet as well. Please see attached Mapping.

IX. Extra Tires

Additional tires are needed to repair and maintain the crash barrier. As such, tires generated on-site from racing operations will be temporarily stored in a Temporary Area designated on the attached Mapping. Pursuant to OAC 3745-27-60 (B)(7), no more than 500 tires will be temporarily stored prior to beneficial reuse. The temporary storage area will not exceed 2,500 square feet with a height of no greater than eight-feet. Arrangements will be made for the transportation and disposal/recycling of excess tires should it be determined that the volume of generated scrap tires outweighs the volume restriction. Please see Attached Mapping for Temporary Storage Area.

X. Engineering/Financial Benefits

The removal and disposal of the current volume of scrap tires is estimated to cost $400,000. The removal of the scrap tire barrier from the race track would essentially cease track use until an alternative system, such as guard rail, is installed. An equivalent length of guard rail would cost over $600,000 to acquire and install. As detailed above, the use of steel guardrail or concrete barrier lessens the overall safety to the driver and would cause substantially more vehicle damage than the use of a scrap tire barrier. Furthermore, the approval of the continued use of scrap tires as a crash barrier at Nelson Ledges allows for capital investments into much needed improvements to the track.

XI. Schedule of the Project

The crash barrier is already in place. Any additional work will be associated with maintenance of the existing crash barrier. Upon authorization of this Beneficial Use application, Ross Racing will be 're-forming' portions of the tire barrier by removing/adding tires to areas along the track that are considered more 'critical' than others. Some areas along a sharp curve, for instance, require a wider, deeper and higher barrier than a straight-away stretch of the track. Some areas along the track in non-critical areas the barrier is too thin or lacks in height. This re-forming effort is labor-intensive as each tire that is moved is done so by hand and will be an on-going endeavor throughout 2017-18.

The scrap tire crash barrier will remain indefinitely at Nelson Ledges. As detailed below, consistent with prior discussions with Ohio EPA, financial assurance will be phased in place and will be maintained so long as tires remain at Nelson Ledges.

XII. Description of the Mosquito Control - Beneficial Use of Scrap Tires

Under OAC 3745-27-60 (C) Anyone storing scrap tires shall maintain mosquito control. Please see enclosed Mosquito Control Plan for Nelson Ledges in Appendix B.

XIII. Fire Prevention / Response

Over the approximately forty years of course operations, there has never been a fire at the Nelson Ledges Race Course. However, preparedness is essential to preventing accidents and responding to emergency situations. Ross Racing has implemented the following resources and guidelines for the prevention and control of a fire related emergency:

Extinguishers: During track operations, an adequate supply of foam fire extinguishers are stationed at ten (10) points throughout the length of the track, at turns and at two (2) points along the straightway. The AFFF (Foam) fire extinguishers will be provided and serviced by Gene Ptacek & Sons Fire Equipment Company. Please see the attached Mapping in Appendix A for Extinguisher Locations and Extinguisher Specifications in Appendix D.

Mechanized Equipment: A back-hoe and excavator are on-site at all times. Each piece of equipment is located in centralized, accessible areas of the course.

Extinguishing Material: Approximately 50 tons of sand is located on-site to assist in extinguishing any fire that might occur. Placement of sand on a fire will suppress the fire of necessary oxygen thereby extinguishing the fire. The backhoe is readily accessible stationed at the site to assist in spreading the material. In addition, the backhoe, or excavator, will be available to create additional breaks in the tire walls preventing the spread of a fire, if required.

Equipment/Fire Breaks: Due to the narrow and low configuration of the tire barrier throughout the race course, along with the multiple fire breaks, the backhoe, or excavator, will be able to quickly maneuver around both sides of the tire barrier to create additional fire breaks, if required. As previously noted, there are currently 17 fire breaks throughout the race course that are 20-feet or greater in width and multiple other fire breaks that are smaller in width. See Attached Mapping in Appendix A.

XIV. Fire Protection of Nelson Ditch

Along areas where the tire barrier is within 100' of Waters of the State Ross Racing will install filter sock to minimize any erosion and storm water run-off. Emergency response equipment such as absorbent booms, pads and other forms of oil absorbent materials will be stored onsite in a designated storage structure – centrally located on the Course grounds and appropriately identified.

Should the use of water for firefighting ever be used by site personnel, or Fire Department personnel, in areas where the tire barrier is within 100' of Waters of the State, and in particular the western south-western portion of the course, site personnel will mobilize the emergency equipment including additional filter sock and absorbent boom and install along the existing Filter Sock to create a containment barrier. Dependent upon the volume of water used, site personnel will also mobilize the backhoe, and/or excavator, and begin to excavate a swale, or ditch, in advance of the containment boom in an effort to provide capacity for the containment of firefighting water - preventing discharge to the Nelson ditch.

Communication with the Fire Department relative to water use, volume, run-off direction, etc. is critical in preventing a discharge to a nearby tributary. As such, NLRC will request local Fire Department personnel to conduct annual inspections and pre-planning at the facility so as to understand the potential for fire and strategize for fire-fighting methods, controls, etc.

Ross Racing personnel will ensure that the following Departments of Ohio EPA are contacted within 8-hours of any fire-related emergency at the NLRC Facility:

- Northeast District Office - Division of Materials & Waste Management
- Central Ohio Office – Division of Materials & Waste Management - Scrap Tire Unit

Emergency contact information is posted at the NLRC facility.

XV. Financial Assurance

Consistent with its agreement with Ohio EPA, NLRC will phase in financial assurance for removal of the tires at the site. Four years from the effective date of the scrap tire beneficial use authorization ("Authorization") issued by Ohio EPA, NLRC (or an affiliated entity) will either secure a bond sufficient to fully fund financial assurance for removal of 165,000 tires at the track ("Bond") or NLRC will begin to set funds aside in an escrow account until such a Bond can be secured. If no Bond is secured, then the first partial payment of $100,000 (25% of the financial assurance amount) shall be placed in escrow no later than the fifth anniversary of the effective date of the Authorization. Annual payments of $100,000 will continue until the total amount of $400,000 is placed in escrow as financial assurance for removal of 165,000 tires at the track. At any time, NLRC (or a related entity) can substitute a Bond as the financial assurance mechanism and withdraw the funds in escrow.

XVI. Letter of Consent from the Owner of the Property

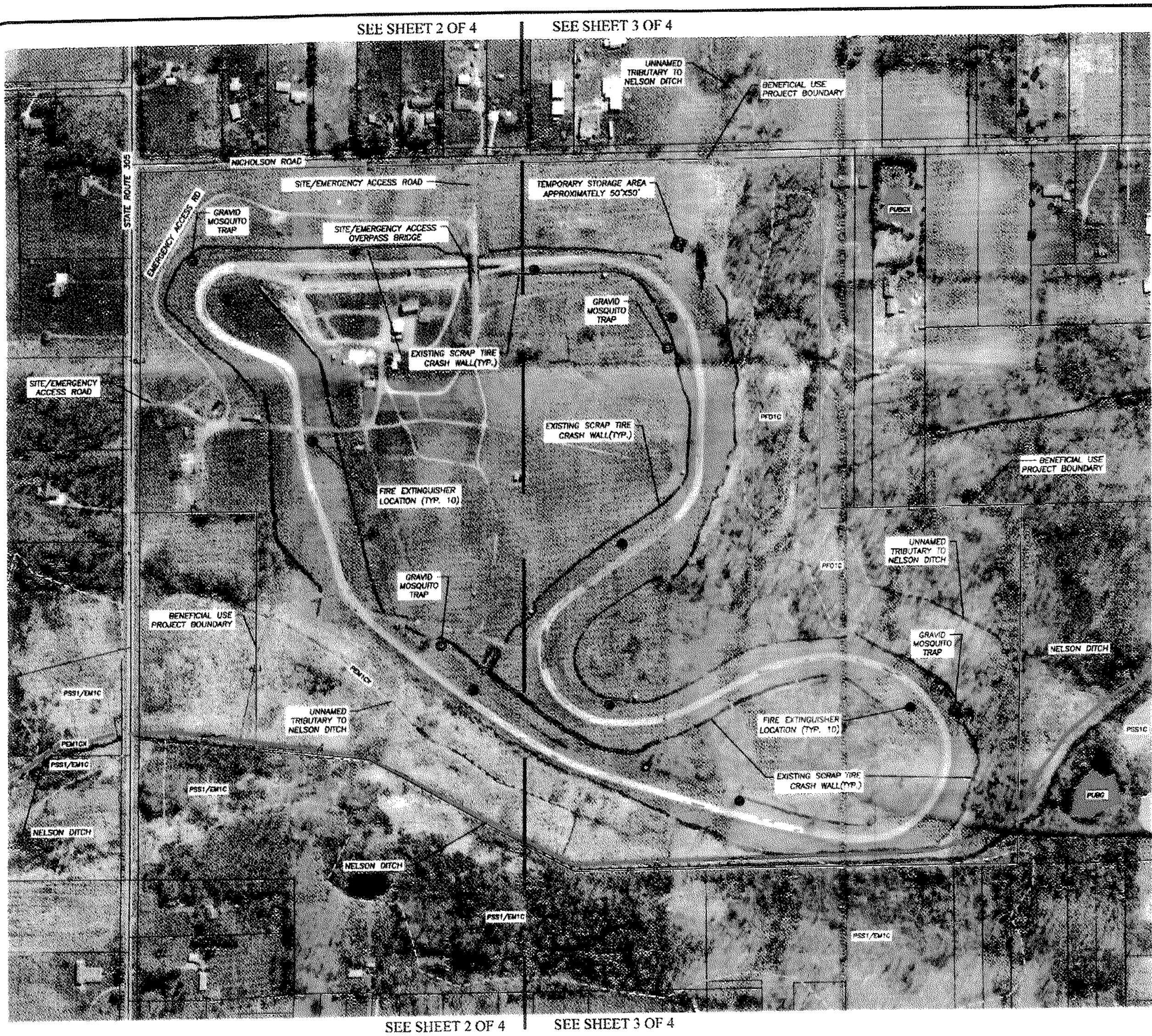
Pursuant to OAC 3745-27-78(a)(9), a copy of the Owner Consent letter date March 21, 2016 from previously provided to Ohio EPA is attached.

XVII. Copy of Letter of Transmittal & Signed Receipt of Project Plan to the Local Health Department

A copy of the letter of transmittal and Certified Mail Receipt demonstrating the project plan was submitted to Portage County Health Department is attached.

Appendix A

Project Mapping



NATIONAL WETLAND INVENTORY LEGEND

FRESHWATER FORESTED/SHRUB WETLAND Description for code PFO1C:

- P System PALUSTRINE: The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.
- FO Class FORESTED: Characterized by woody vegetation that is 6 m tall or taller.
- 1 Subclass Broad-Leaved Deciduous: Woody angiosperms (trees or shrubs) with relatively wide, flat leaves that are shed during the cold or dry season; e.g., black ash (Fraxinus nigra).
- C Water Regime Seasonally Flooded: Surface water is present for extended periods especially early in the growing season but is absent by the end of the growing season in most years. The water table after flooding ceases is variable, extending from saturated to the surface to a water table well below the ground surface.

FRESHWATER FORESTED/SHRUB WETLAND Description for code PSS1/EM1C:

- P System PALUSTRINE: The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.
- SS Class SCRUB-SHRUB: Includes areas dominated by woody vegetation less than 6 m (20 feet) tall. The species include true shrubs, young trees (saplings), and trees or shrubs that are small or stunted because of environmental conditions.
- 1 Subclass Broad-Leaved Deciduous: Woody angiosperms (trees or shrubs) with relatively wide, flat leaves that are shed during the cold or dry season; e.g., black ash (Fraxinus nigra).
- EM Class EMERGENT: Characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens. This vegetation is present for most of the growing season in most years. These wetlands are usually dominated by perennial plants.
- 1 Subclass Persistent: Dominated by species that normally remain standing at least until the beginning of the next growing season. This subclass is found only in the Estuarine and Palustrine systems.
- C Water Regime Seasonally Flooded: Surface water is present for extended periods especially early in the growing season but is absent by the end of the growing season in most years. The water table after flooding ceases is variable, extending from saturated to the surface to a water table well below the ground surface.

FRESHWATER FORESTED/SHRUB WETLAND Description for code PSS1C:

- P System PALUSTRINE: The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.
- SS Class SCRUB-SHRUB: Includes areas dominated by woody vegetation less than 6 m (20 feet) tall. The species include true shrubs, young trees (saplings), and trees or shrubs that are small or stunted because of environmental conditions.
- 1 Subclass Broad-Leaved Deciduous: Woody angiosperms (trees or shrubs) with relatively wide, flat leaves that are shed during the cold or dry season; e.g., black ash (Fraxinus nigra).
- C Water Regime Seasonally Flooded: Surface water is present for extended periods especially early in the growing season, but is absent by the end of the growing season in most years. The water table after flooding ceases is variable, extending from saturated to the surface to a water table well below the ground surface.

FRESHWATER EMERGENT WETLAND Description for code PEM1Cx:

- P System PALUSTRINE: The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.
- EM Class EMERGENT: Characterized by erect, rooted, herbaceous hydrophytes, excluding mosses and lichens. This vegetation is present for most of the growing season in most years. These wetlands are usually dominated by perennial plants.
- 1 Subclass Persistent: Dominated by species that normally remain standing at least until the beginning of the next growing season. This subclass is found only in the Estuarine and Palustrine systems.
- C Water Regime Seasonally Flooded: Surface water is present for extended periods especially early in the growing season, but is absent by the end of the growing season in most years. The water table after flooding ceases is variable, extending from saturated to the surface to a water table well below the ground surface.

FRESHWATER POND Description for code PUBG:

- P System PALUSTRINE: The Palustrine System includes all nontidal wetlands dominated by trees, shrubs, persistent emergents, emergent mosses or lichens, and all such wetlands that occur in tidal areas where salinity due to ocean-derived salts is below 0.5 ppt. It also includes wetlands lacking such vegetation, but with all of the following four characteristics: (1) area less than 8 ha (20 acres); (2) active wave-formed or bedrock shoreline features lacking; (3) water depth in the deepest part of basin less than 2.5 m (8.2 ft) at low water; and (4) salinity due to ocean-derived salts less than 0.5 ppt.
- UB Class UNCONSOLIDATED BOTTOM: Includes all wetlands and deepwater habitats with at least 25% cover of particles smaller than stones (less than 6-7 cm), and a vegetative cover less than 30%.
- G Water Regime Intermittently Exposed: Water covers the substrate throughout the year except in years of extreme drought.
- X SPECIAL MODIFIER EXCAVATED: THIS MODIFIER IS USED TO IDENTIFY WETLAND BASINS OR CHANNELS THAT WERE EXCAVATED BY HUMANS.

NOTES

1. ORIGINAL MAPPING COMPLETED BY MS CONSULTANTS OF YOUNGSTOWN, OHIO.
2. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI Environmental AND BRAMHALL ENGINEERING FEBRUARY 2017.
   - 2.1. NATIONAL WETLANDS INVENTORY DATA DOWNLOADED FROM US FISH AND WILDLIFE SERVICE. DATA SET LAST UPDATED 09/27/2016.
   - 2.2. NATIONAL WETLANDS INVENTORY ATTRIBUTE DATA FOR DESCRIPTIONS DECODED USING HTTPS://FWSMAPSERVICES.WIM.USGS.GOV/DECODERS/SWI.ASPX.
   - 2.3. EXISTING SCRAP TIRE CRASH WALL PILE NUMBERS TAKEN FROM "NELSON LEDGES TIRE WALL" PREPARED FOR ROSS DEVELOPMENT WITH PLOT DATE 12/23/2015.
   - 2.4. IMAGE ON SHEET 1 IS 2016 PRELIMINARY AERIAL PHOTO FROM HTTP://WWW.CO.PORTAGE.OH.US/GIS.HTM.
3. SEE SHEETS 2 AND 3 FOR EXISTING SCRAP TIRE CRASH WALLS.
4. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI ENVIRONMENTAL AND BRAMHALL ENGINEERING APRIL 2017.
   - 4.1. ADDED FIRE EXTINGUISHER LOCATIONS TO MAP SHEETS 1-3.
   - 4.2. CONTOURS ON PAGE 4 ARE DOWNLOADED FROM OHIO GEOGRAPHICALLY REFERENCED INFORMATION PROGRAM, OHIO SPATIAL DATA INFRASTRUCTURE - OSDI DOWNLOAD: OSIP 1, PORTAGE COUNTY LIDAR LAS TILED.

GRAPHIC SCALE

0 100 200 400

(IN FEET)

SCALE: 1" = 200'

SURVEY NOTE:

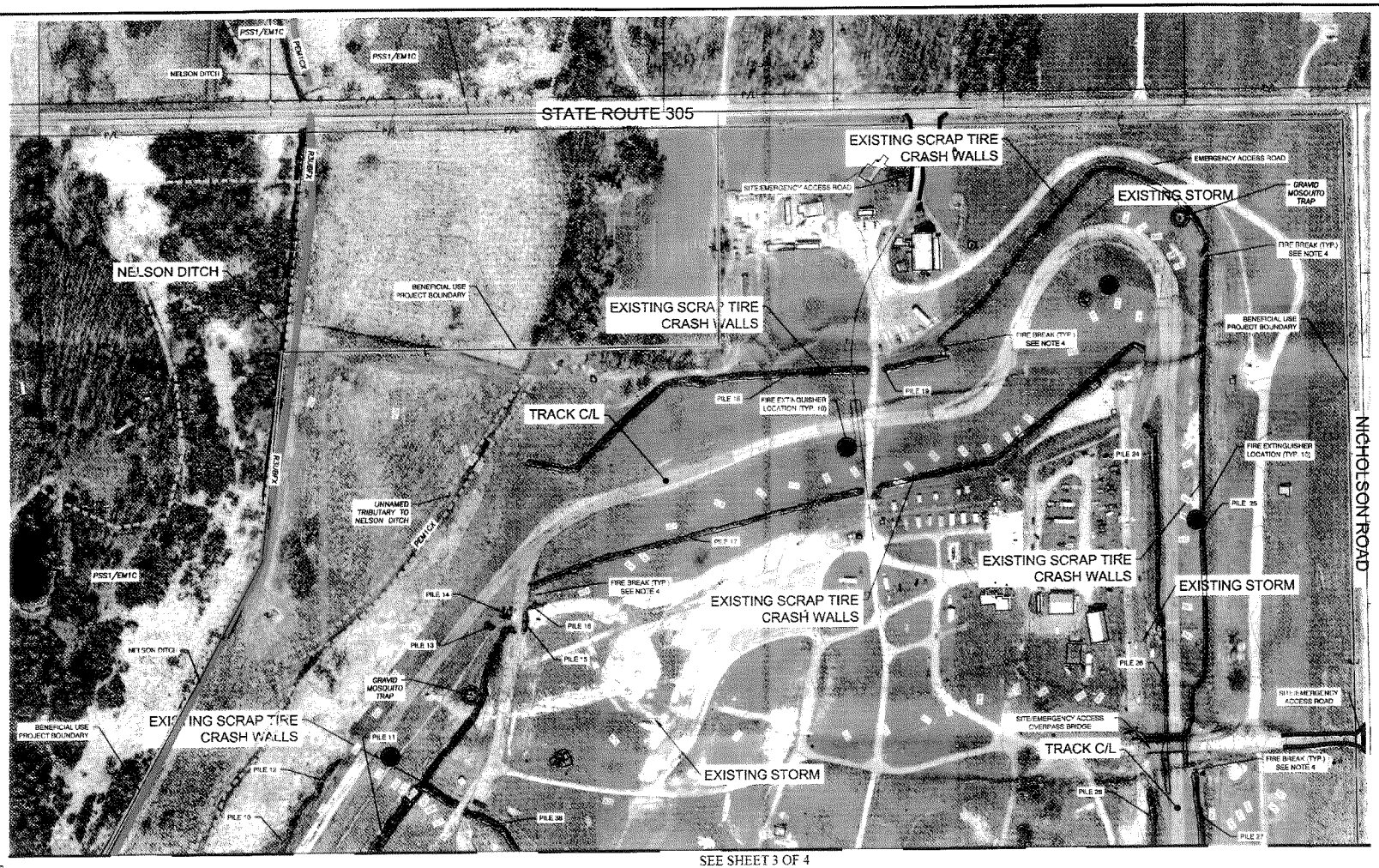
A BOUNDARY SURVEY PURSUANT TO CHAPTER 4733-37 OF THE OHIO ADMINISTRATIVE CODE HAS NOT BEEN PERFORMED BY BRAMHALL ENGINEERING & SURVEYING COMPANY, INC. THIS PLAN IS BASED UPON AVAILABLE COUNTY INFORMATION.

NELSON LEDGES ROAD COURSE
10342 STATE ROUTE 305
GARRETTSVILLE, OHIO

REVISIONS FOR BENEFICIAL USE APPLICATION
OVERALL SITE PLAN

NELSON TOWNSHIP, COUNTY OF PORTAGE, STATE OF OHIO

BRAMHALL
ENGINEERING AND SURVEYING COMPANY
801 MOORE ROAD AVON, OHIO 44011
(440) 934 - 7878 (440) 934 - 7879 FAX



GRAPHIC SCALE
0 100
50 200
(IN FEET)
SCALE: 1" = 100'

PILE #	LENGTH FT	WIDTH FT	HEIGHT FT
10	255	16-10	3-5
11	1,148	25-7	3-5
12	152	9-6	3-5
13	18	7	3-5
14	38	6-7	3-5
15	48	9-8	3-5
16	40	5-3	3-5
17	707	14-10	3-5
18	772	16-10	3-5
19	139	11-6	3-5
20	664	15-10	3-5
21	178	10	3-5
22	36	8-6	3-5
23	612	14-11	3-5
24	419	11-6	3-5
25	1,055	14-5	3-5
26	348	11-5	3-5
27	427	14-11	3-5
28	404	12-8	3-5
30	123	14-12	3-5

SEE SHEET 3 OF 4

NOTES

1. ORIGINAL MAPPING COMPLETED BY MS CONSULTANTS OF YOUNGSTOWN, OHIO.
2. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI Environmental AND BRAMHALL ENGINEERING FERRUARY 2017.
   2.1. NATIONAL WETLANDS INVENTORY DATA DOWNLOADED FROM US FISH AND WILDLIFE SERVICE. DATA SET LAST UPDATED 09/27/2016.
   2.2. NATIONAL WETLANDS INVENTORY ATTRIBUTE DATA FOR DESCRIPTIONS DECODED USING HTTPS://FWSMAPSERVICES.WIM.USGS.GOV/DECODERS/SWI.ASPX.
   2.3. EXISTING SCRAP TIRE CRASH WALL PILE NUMBERS TAKEN FROM "NELSON LEDGES TIRE WALL" PREPARED FOR ROSS DEVELOPMENT WITH PLOT DATE 12/23/2015.
3. SEE SHEET 1 FOR NATIONAL WETLAND INVENTORY LEGEND.
4. CURRENTLY THE EXISTING SCRAP TIRE CRASH WALLS ARE IN DISCRETE PILES CREATING FIRE BREAKS BETWEEN THE PILE OF VARYING WIDTHS.
5. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI ENVIRONMENTAL AND BRAMHALL ENGINEERING APRIL 2017.
   5.1 ADDED FIRE EXTINGUISHER LOCATIONS TO MAP SHEETS 1-3.

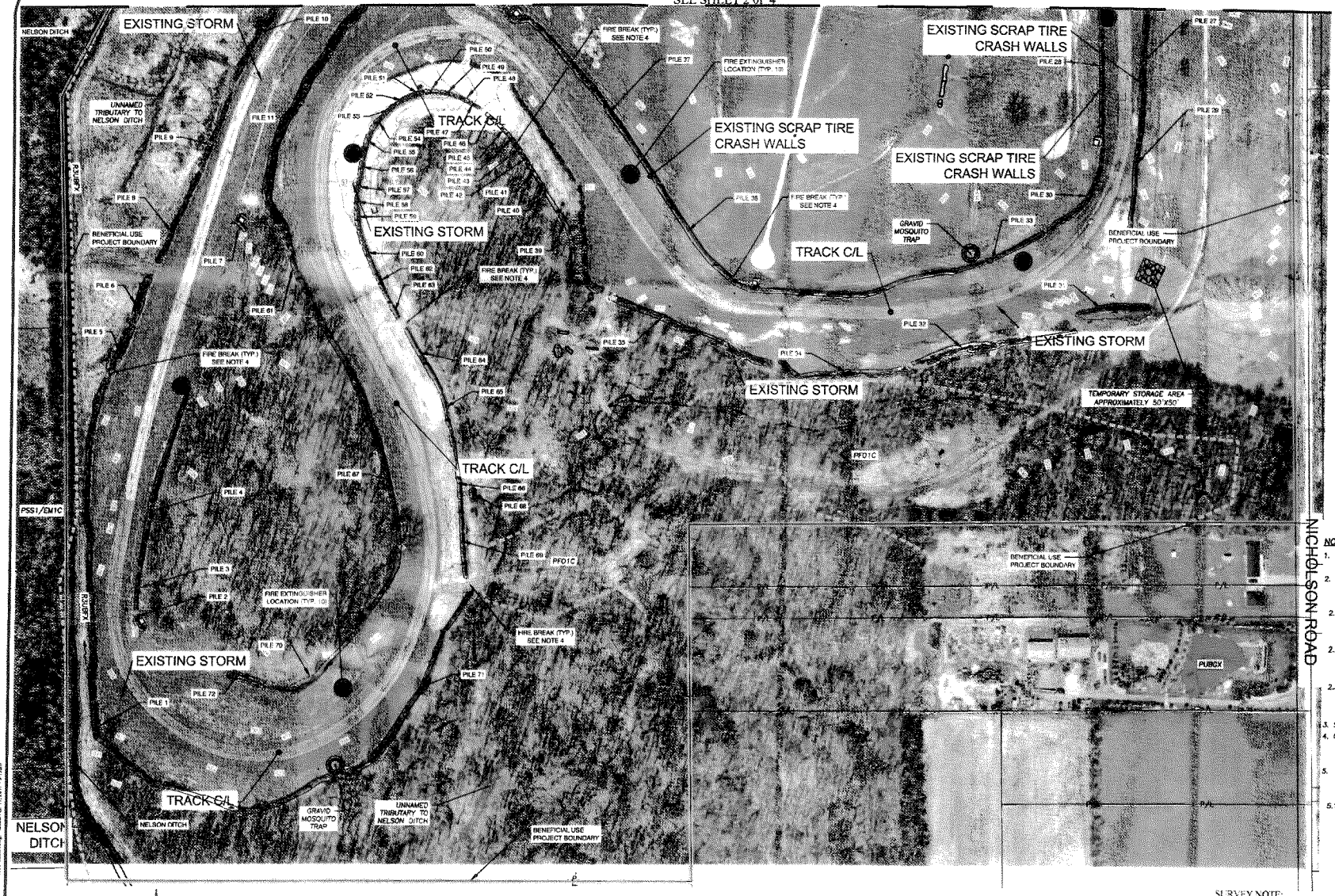
SURVEY NOTE:
A BOUNDARY SURVEY PURSUANT TO CHAPTER 4733-37 OF THE OHIO ADMINISTRATIVE CODE HAS NOT BEEN PERFORMED BY BRAMHALL ENGINEERING & SURVEYING COMPANY, INC. THIS PLAN IS BASED UPON AVAILABLE COUNTY INFORMATION

NELSON LEDGES ROAD COURSE
10342 STATE ROUTE 305
GARRETTSVILLE, OHIO

REVISIONS FOR BENEFICIAL USE APPLICATION
NORTHERN PART SITE PLAN
NELSON TOWNSHIP, COUNTY OF PORTAGE, STATE OF OHIO

BRAMHALL
ENGINEERING AND SURVEYING COMPANY
801 MOORE ROAD AVON, OHIO 44011
(440) 934 - 7878 (440) 934 - 7879 FAX

SEE SHEET 2 OF 4



PILE #	LENGTH FT	WIDTH FT	HEIGHT FT
1	1,338	19–6	3–5
2	47	15–9	3–5
3	83	7	3–5
4	395	13–8	3–5
5	75	19–6	3–5
6	109	16–12	3–5
7	46	7–6	3–5
8	214	11–6	3–5
9	146	12–7	3–5
10	255	16–10	3–5
11	1,148	25–7	3–5
27	427	14–11	3–5
28	404	12–8	3–5
29	236	17–8	3–5
30	234	12–8	3–5
31	165	32–13	3–5
32	369	20–7	3–5
33	712	12–8	3–5
34	307	17–7	3–5
35	385	13–8	3–5
36	258	13–12	3–5
37	517	14–9	3–5
39	262	17–8	3–5
40	30	8	3–5
41	30	8	3–5
42	26	8	3–5
43	21	8	3–5
44	26	7	3–5
45	26	7	3–5
46	32	7	3–5
47	26	6	3–5
48	34	8	3–5
49	31	7	3–5
50	29	8	3–5
51	31	9	3–5
52	30	7	3–5
53	33	10	3–5
54	38	12–9	3–5
55	65	13–9	3–5
56	32	9	3–5
57	32	7–6	3–5
58	32	7–6	3–5
59	41	11–10	3–5
60	105	10–9	3–5
61	101	9–5	3–5
62	32	8	3–5
63	73	8–7	3–5
64	160	10–8	3–5
65	117	11–4	3–5
66	109	10–3	3–5
67	712	13–7	3–5
68	18	15	3–5
69	166	8–7	3–5
70	212	13–6	3–5
71	495	13–9	3–5
72	62	8–7	3–5

NOTES

1. ORIGINAL MAPPING COMPLETED BY MS CONSULTANTS OF YOUNGSTOWN, OHIO.
2. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI Environmental AND BRAMHALL ENGINEERING FEBRUARY 2017.
   2.1. NATIONAL WETLANDS INVENTORY DATA DOWNLOADED FROM US FISH AND WILDLIFE SERVICE. DATA SET LAST UPDATED 09/27/2016.
   2.2. NATIONAL WETLANDS INVENTORY ATTRIBUTE DATA FOR DESCRIPTIONS DECODED USING HTTPS://FWSMAPSERVICES.WIM.USGS.GOV/DECODERS/SWI.ASPX.
   2.3. EXISTING SCRAP TIRE CRASH WALL PILE NUMBERS TAKEN FROM "NELSON LEDGES TIRE WALL" PREPARED FOR ROSS DEVELOPMENT WITH PLOT DATE 12/23/2015.
3. SEE SHEET 1 FOR NATIONAL WETLAND INVENTORY LEGEND.
4. CURRENTLY THE EXISTING SCRAP TIRE CRASH WALLS ARE IN DISCRETE PILES CREATING FIRE BREAKS BETWEEN THE PILE OF VARYING WIDTHS.
5. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI ENVIRONMENTAL AND BRAMHALL ENGINEERING APRIL 2017.
   5.1 ADDED FIRE EXTINGUISHER LOCATIONS TO MAP SHEETS 1–3.

SURVEY NOTE:

A BOUNDARY SURVEY PURSUANT TO CHAPTER 4733-37 OF THE OHIO ADMINISTRATIVE CODE HAS NOT BEEN PERFORMED BY BRAMHALL ENGINEERING & SURVEYING COMPANY, INC. THIS PLAN IS BASED UPON AVAILABLE COUNTY INFORMATION.

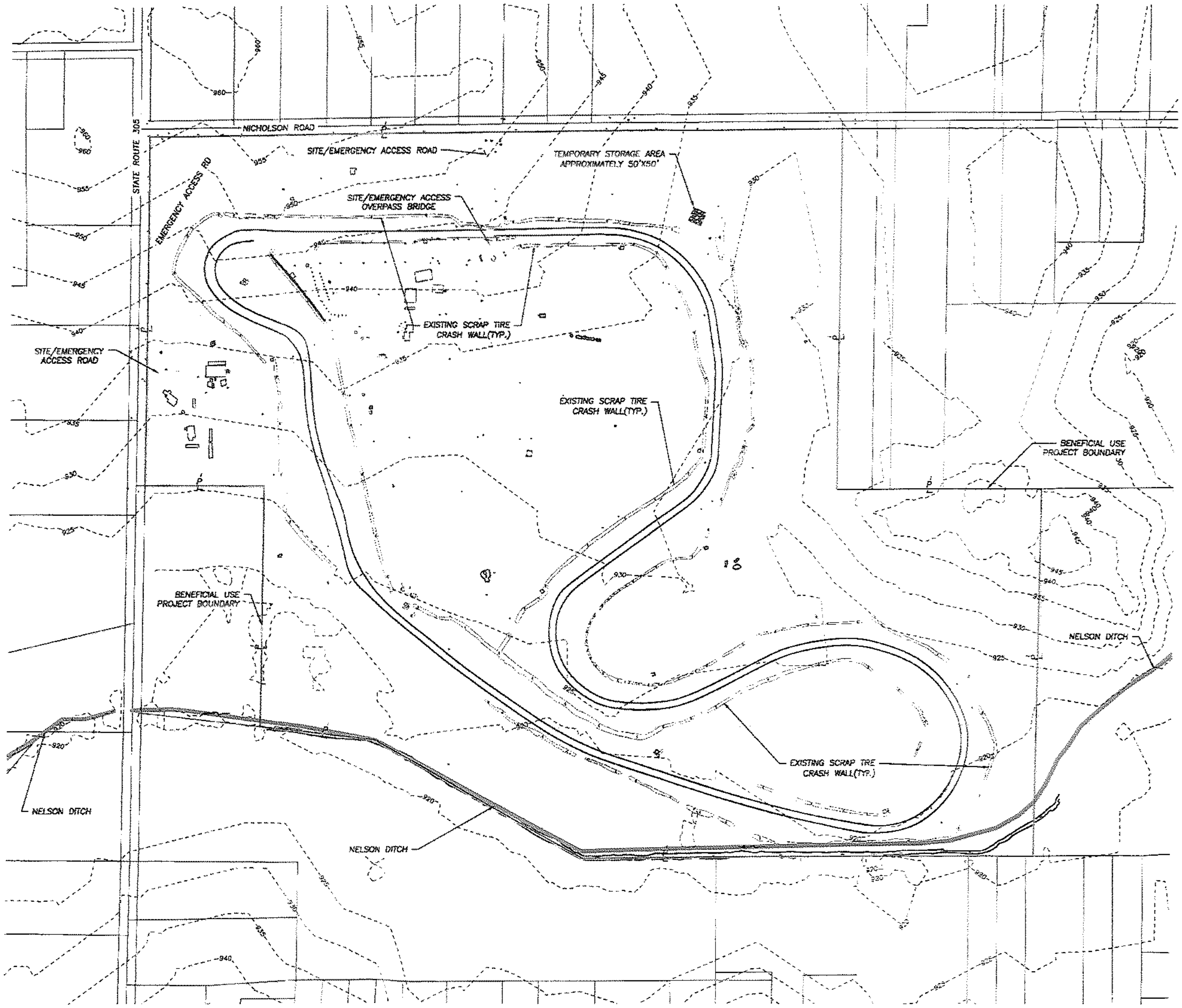
GRAPHIC SCALE
0 100 50 200
(IN FEET)
SCALE: 1" = 100'

NELSON LEDGES ROAD COURSE
10342 STATE ROUTE 305
GARRETTSVILLE, OHIO

REVISIONS FOR BENEFICIAL USE APPLICATION
SOUTHERN PART SITE PLAN
NELSON TOWNSHIP, COUNTY OF PORTAGE, STATE OF OHIO

BRAMHALL
ENGINEERING AND SURVEYING COMPANY
801 MOORE ROAD AVON, OHIO 44011
(440) 934 - 7878 (440) 934 - 7879 FAX

SEE SHEET 2 OF 4 SEE SHEET 3 OF 4



SEE SHEET 2 OF 4 SEE SHEET 3 OF 4

NOTES

1. ORIGINAL MAPPING COMPLETED BY MS CONSULTANTS OF YOUNGSTOWN, OHIO.
2. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI Environmental AND BRAMHALL ENGINEERING FEBRUARY 2017.
   - 2.1. NATIONAL WETLANDS INVENTORY DATA DOWNLOADED FROM US FISH AND WILDLIFE SERVICE. DATA SET LAST UPDATED 09/27/2016
   - 2.2. NATIONAL WETLANDS INVENTORY ATTRIBUTE DATA FOR DESCRIPTIONS DECODED USING HTTPS://FWSMAPSERVICES.WIM.USGS.GOV/DECODERS/SWI.ASPX.
   - 2.3. EXISTING SCRAP TIRE CRASH WALL PILE NUMBERS TAKEN FROM "NELSON LEDGES TIRE WALL" PREPARED FOR ROSS DEVELOPMENT WITH PLOT DATE 12/23/2015.
   - 2.4. IMAGE ON SHEET 1 IS 2016 PRELIMINARY AERIAL PHOTO FROM HTTP://WWW.CO.PORTAGE.OH.US/GIS.HTM.
3. SEE SHEETS 2 AND 3 FOR EXISTING SCRAP TIRE CRASH WALLS.
4. REVISIONS FOR BENEFICIAL USE APPLICATION WERE COMPLETED BY ENVI ENVIRONMENTAL AND BRAMHALL ENGINEERING APRIL 2017.
   - 4.1. ADDED FIRE EXTINGUISHER LOCATIONS TO MAP SHEETS 1–3.
   - 4.2. CONTOURS ON PAGE 4 ARE DOWNLOADED FROM OHIO GEOGRAPHICALLY REFERENCED INFORMATION PROGRAM, OHIO SPATIAL DATA INFRASTRUCTURE – OSDI DOWNLOAD: OSIP 1, PORTAGE COUNTY LIDAR LAS TILED.

SURVEY NOTE:

A BOUNDARY SURVEY PURSUANT TO CHAPTER 4733-37 OF THE OHIO ADMINISTRATIVE CODE HAS NOT BEEN PERFORMED BY BRAMHALL ENGINEERING & SURVEYING COMPANY, INC. THIS PLAN IS BASED UPON AVAILABLE COUNTY INFORMATION.

GRAPHIC SCALE
0 100 200 400
(IN FEET)
SCALE: 1" = 200'

NELSON LEDGES ROAD COURSE
10342 STATE ROUTE 305
GARRETTSVILLE, OHIO

REVISIONS FOR BENEFICIAL USE APPLICATION
TOPOGRAPHIC MAP - 5' CONTOURS

NELSON TOWNSHIP, COUNTY OF PORTAGE, STATE OF OHIO

BRAMHALL
ENGINEERING AND SURVEYING COMPANY
801 MOORE ROAD AVON, OHIO 44011
(440) 934 - 7878 (440) 934 - 7879 FAX

Appendix B

Mosquito Control Plan
Nelson Ledges Road Course

Mosquito Control Plan

Source: Beneficial Use of Scrap Tires for Crash Barrier

Location: Nelson Ledges Race Course
10342 SR 305
Garrettsville, Ohio 44231

Contact: Brian Ross
1990 Niles-Cortland Road
Cortland, Ohio 44410
330-856-7792

Contractor: Alexander's Pest Control
P.O. Box 5376
Poland, Ohio 44514
(330) 542-1130
Mr. Steve Miller

Measurement: Gravid Traps will also be placed along the Scrap Tire (Crash) Barrier (see attached map for location of the traps). Gravid Traps are a means of determining a 'count' of mosquitoes and are used at Nelson Ledges Race Course to substantiate the need for an additional spray, or treatment, by the Contractor.

Frequency: Monthly treatments will be applied along the tire barrier and temporary storage pile during the time-period of April-thru-November- ("Mosquito Season"). In addition, four (4) Gravid Traps will be placed in pre-determined locations and checked weekly. Any Gravid Trap containing 50+ mosquitoes will initiate an additional treatment application of the entire road course and temporary storage pile. The additional treatment will be conducted within 72-hours of Gravid Trap result. Traps are re-placed weekly for a 32-week period; April-thru-November.

Product Sprayed: Kontrol 30/30 is for Mosquitoes, Flies, and Gnats and is an oil based formulation of 30% permethrin / 30% PBO. This product is a broad-spectrum insecticide that does not have an EPA water set back requirement and can be applied ultra-low volume (ULV) by air or ground.

EPA Registration: 73748-5

Method: Ultra Low Flow Flogger. Truck-mounted unit.

Prevention: As scrap tires are added to the barrier, re-located to other portions of the barrier, etc. Ross Racing personnel will stack, weave or locate the tire onto the barrier to prevent, or minimize, rain water from collecting inside the tire.

Records/Reporting: During Mosquito Season, Ross Racing will provide monthly reports to Ohio EPA and the Portage County Health Department regarding implementation of this mosquito control plan. Ross Racing will maintain all records pertaining to Mosquito Control for a minimum of 3 years. All records will be available for inspection by Portage County Health Department and Ohio EPA upon request.

Appendix C

Tire Inventory Spreadsheet

AEROCON PHOTOGRAMMETRIC SERVICES, INC.

FLIGHT DATE 7-1-2008 9:51 LOCAL

NELSON LEDGES TIRE WALL

VOLUME REPORT

PILE	CUBIC YDS.
1	792.9
2	34.3
3	33.9
4	182.1
5	44.7
6	124.8
7	9.5
8	76.4
9	62.0
10	140.6
11	1625.9
12	62.1
13	8.0
14	14.2
15	20.1
16	6.7
17	483.7
18	862.6
19	98.8
20	605.6
21	91.5
22	8.4
23	472.9
24	248.2
25	806.2
26	192.1
27	350.5
28	224.3
29	113.3
30	151.1
31	429.9
32	175.2
33	477.5
34	188.7
35	237.1
36	223.3
37	359.6
38	113.1
39	204.7
40	14.6
41	16.0
42	15.9
43	12.5
44	12.9
45	14.2
46	15.7
47	8.1
48	14.2
49	17.0
50	14.9
51	18.7
52	18.2
53	22.0
54	25.9
55	42.8
56	19.1
57	14.5
58	15.5
59	28.5
60	72.7
61	37.6
62	19.1
63	38.5
64	78.1
65	47.1
66	48.7
67	373.8
68	10.7
69	64.5
70	30.2
71	306.4
72	2.5
Total Volume (Cu. Yd.):	11847.7
	165,867.19 tires

Appendix D

Fire Extinguisher Spec's

Yes! I am interested

Foam Cartridge Type Fire Extinguisher

REQUEST CALLBACK

Approx. Rs 1,200 / Piece

Get Best Quote

Specification:

- Aqueous Film Forming Foam (AFFF) is capable of fighting Class A and Class B fires.
- BIS Approved (IS 15683).
- CE Certified.
- High-quality pure polyester powder coating.
- Spray nozzle to provide high fire rating.
- Choice of capacity 6 Ltrs. 9 Ltrs.
- Controlled discharge.
- Brass nickel plated head valve with simple squeeze operation.
- Rechargeable and easy to service.
- High-quality EPDM Rubber braided hose is far more flexible than the normal rubber used in hose pipe and also far less prone to cracks (on Demand).
- Large loop Stainless Steel pull the pin.

Specification:

TYPE	FOAM	
MODEL	G-39A	G-39
Capacity	6 Ltr.	9 Ltr.
Design	Hose & Air aspirated Nozzle	
Fire Rating	8A:55B	4A:89B
Height (Approx.)	530 mm.	585 mm.
Diameter (Approx.)	150±10 mm.	180±10 mm.
Average Discharge time	21 Sec.	32 Sec.
Average Range of throw	5 m.	7 m.
Average % Discharge	96%	97%
Operating Temperature	+5 °C to +55 °C	
Service Pressure (Ps)	14 bar.	
Max. Service Pressure (Pms)	16 bar.	
Test Pressure	35 bar.	
Expelling Agent	CO2 Gas	
CO2 Gas Cartridge	60 gm.	
Full Weight (Approx.)	9 kg.	13 kg.
Empty Weight (Approx.)	3.9 kg.	5.3 kg.
Shipping Weight (Approx.)	9.3 kg.	13.5 kg.
Packing Standard	2 in 1-22.5"X6.75"X14.10"	1 in 1-24.75"X8"X8"
Mounting Bracket	Wall bracket	
Approvals	CE	BIS & CE

Yes! I am interested

Appendix E

Consent Letter – Landowner
Health Department Submittal Certification

March 21, 2016

Mr. Jamal Singh. R.S
Environmental Specialist
Division of Materials and Waste Management
Ohio EPA- NEDO
2110 East Aurora Road
Twinsburg, OH 44087-1924

RE: **Nelson Ledges Road Course**
Scrap Tire Beneficial Reuse
Portage County

Dear Mr. Singh:

The purpose of this letter is to acknowledge my understanding of a proposed beneficial reuse plan for scrap tires at the Nelson Ledges Road Course located at 10342 State Route 305 in Garrettsville, Ohio. These tires, placed along the perimeter of the race course, act as a safety barrier in the event of mechanical failure or other situations during road course events. Barriers of this type have proven highly effective, not only at Nelson Ledges, but at other tracks across the country and have greatly decreased serious injuries and property damages.

The current site operator, Brian Ross Racing, LLC, is applying for the beneficial reuse of these tires at the facility. I understand that, as the Owner of the property on which this beneficial use of scrap tires will be placed, Nelson Sports, Inc. shall be responsible for the removal of the scrap tires in the event the project fails to comply with an approved beneficial use plan and the beneficial use applicant fails to correct the problem for as long as we own the property.

If you require further information, please do not hesitate to contact me at (216) 771.5356.

Sincerely,

Sandy Decker President

Nelson Sports, Inc.

cc: Brian Ross – Brian Ross Racing, LLC

March 21, 2017

Portage County Health Department
Attn: Environmental Dept.
705 Oakwood Street – Suite 208
Ravenna, Ohio 44266

Re: Nelson Ledges Road Course
Scrap Tire Beneficial Use Application

Dear Madam or Sir:

On behalf of NLRC, LLC please find enclosed a Scrap Tire Beneficial Use Application for the Nelson Ledges Road Course located at 10342 State Route 305–Garrettsville, Ohio.

The enclosed application has also been submitted to the Ohio EPA-Division of Materials & Waste Management-Central Office.

Please feel free to contact our office with any questions.

Sincerely,
ENVi Environmental, LLC

Brandon Smith
Project Manager

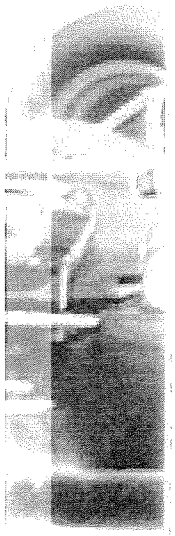
Enclosure

CC: Mr. Brian Ross, NLRC, LLC
Mr. Joe Koncelik, Tucker Ellis LLP

Appendix F

History of Tire Crash Barrier at Nelson Ledges

Tires:



WHAT ARE ALL THOSE TIRES?

The above question is one that will be asked thousands of times over the summer here at Nelson Ledges Road Course and the answer, has already saved thousands of dollars in expensive car parts and more importantly, driver injuries. The idea of using old tires as a buffer for "wandering" race cars was first brought to the attention of the Nelson Ledges officials by Grover Griggs of Berlin Center, Ohio.

The idea was first put into use in the last part of the 1973 season. The long straight, running next to the swamp (compliments of our friendly neighborhood beavers) was the most dangerous section of the course. Due to the partially submerged tree swamp, high water and other hazards, it was the most logical starting point. The number of cars that have been buffered by the TIREWALL number well over 50. None have sucessfully jumped the ricked tires entirely, although several have teetered on top of them.

The term "ricked" is used to describe the manner in which the tires are stacked. It is the method that tire manufacturer s use in transporting new tire loads and is the proven way to stabilize them. Fill the tires with rain water and it is definitely one of the safest methods of stopping a car that could be traveling upwards of 150mph. The TIREWALL has been continued around the track as tire donations are brought in and at present extends down through turn 9.

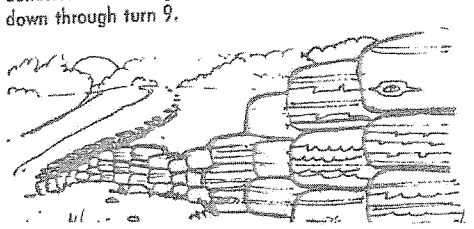
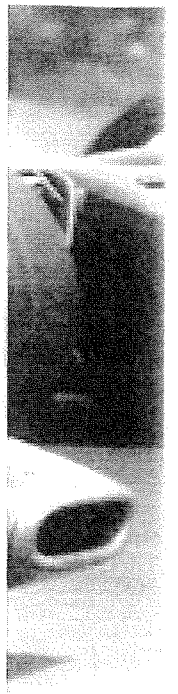
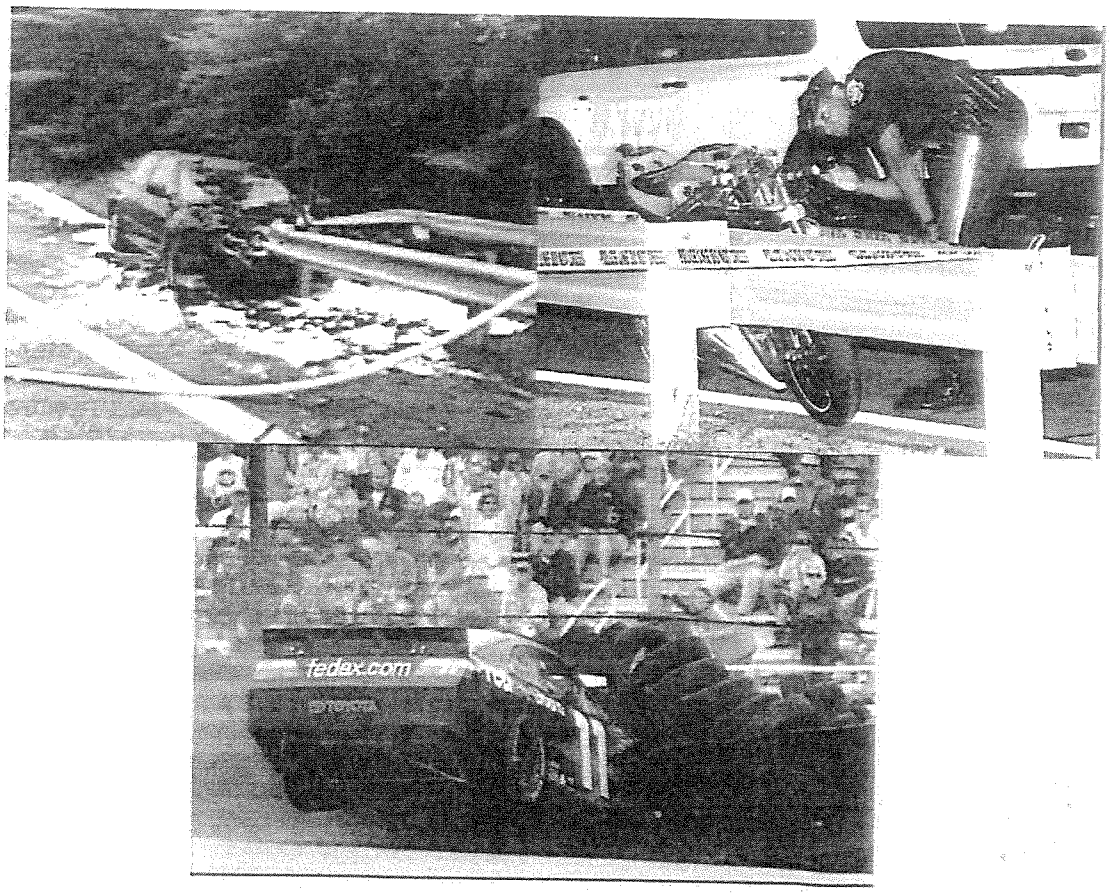


ILLUSTRATION BY KEVIN LANE

"We've called this meeting of the Nelson Ledges Beaver Society to decide what to do with those funny black things that have sprouted along OUR SWAMP."

The use of the TIREWALL was brought to the attention of Lester Seasongood, a race oriented insurance broker, who presents an award to a group or company that "promotes safety on the street, highway, or race course." In 1975 the Lester Seasongood award was presented to Nelson Ledges Race Course at the SCCA convention. With special mention to Grover Griggs and John McGill, Mahoning Valley Motorsports joined a list of winners that includes General Motors (1970 - side door beam), Firestone (1971 - fuel cell), Daimler-Benz (electronic braking system - 1972), Dupont (1973 - NOMEX fire-resistant material), and Goodyear Tire & Rubber Co. (1974 - safety fuel cell). It is a great group to be counted among, but if racing can be made safer and more fun for drivers and spectators it will probably happen, at the home of the TIREWALL.




fedex.com