



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

February 1, 2018

Solid Waste Authority of Central
Ohio
4239 London-Groveport Rd.
Grove City, OH 43123

**Re: Franklin County Sanitary Landfill
Permit - Long Term
Draft for Public Comment
Municipal Solid Waste Landfills
Franklin County
MSWL018803**

**Subject: Franklin County Sanitary Landfill, Franklin County
Draft PTI Number: 18147**

To Whom it may concern:

The application for a Permit to Install (PTI) with accompanying plans and specifications for the above referenced facility has been reviewed by the staff of the Ohio EPA. It is the recommendation of the staff that the Director issue a PTI since your proposal appears to comply with applicable Ohio solid waste rules.

Therefore, enclosed please find a Permit to Install which is being issued to you today in draft form pursuant to Ohio Revised Code Chapter 3734 and the rules adopted thereunder.

A public notice concerning the issuance of this draft Permit to Install will appear in the following newspapers: Columbus Dispatch, Columbus Post, and Minority Communicator News. A public hearing will be held at 6:00 p.m. on March 19, 2018, at Grove City High School Auditorium, 4665 Hoover Road, Grove City, Ohio 43123 in Franklin County. Written comments will be accepted for the Director's consideration until the close of business on March 26, 2018. The application may be reviewed in accordance with Ohio EPA's file review procedures by contacting Ohio EPA Central District Office, 50 W. Town St, Columbus, Ohio 43215, Tel: (614) 728-3778.

Following the close of the public comment period, the Director may issue a final Permit to Install upon such terms and conditions as he finds necessary to ensure that the operation of your facility is in accordance with Ohio's solid waste rules.

Please be advised that the detailed plans which you had submitted with your application will be transmitted with the issuance of the final permit. If you have any questions concerning this draft Permit to Install, please contact the Ohio EPA Central District Office at the above address and telephone number.

Sincerely,

A handwritten signature in black ink, appearing to read "Greg Nichols". The signature is written in a cursive style with a large, stylized "G" and "N".

Greg Nichols, Administrative Processing Unit
Division of Materials and Waste Management

Enclosure

ec: Megan Ujvari, DMWM, CO
Scott Hester, DMWM, CO
Constance Livchak, DMWM, CDO
Alan Hurtt, DMWM, CDO
Kristopher Weiss, PIC

OHIO ENVIRONMENTAL PROTECTION AGENCY

PERMIT TO INSTALL

Application Number: 18147
Application Received: March 1, 2017
Permit Fee: \$80,000.00
Permit Fee Balance: \$79,600.00

Applicant: Solid Waste Authority of Central Ohio
Address: 4239 London-Groveport Road
Grove City, OH 43123

Facility: Franklin County Sanitary Landfill
Address: 3851 London-Groveport Road
Grove City, OH 43123

Location: The facility is located off State Route 665 (London-Groveport Rd.) 0.7 miles west from its intersection with Interstate Route 71, Jackson Township, Franklin County.

Permit: Vertical and Lateral Expansion

Issuance Date:

Effective Date:

The above-named entity is hereby issued a permit to install (permit) for the above-described source pursuant to Ohio Administrative Code (OAC) Rule 3745-27-02. Issuance of this permit 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 is issued subject to the attached conditions which are hereby incorporated and made a part hereof.

Ohio Environmental Protection Agency

Craig W. Butler, Director

PERMIT SUMMARY

This permit (PTI Number 18147) authorizes the vertical and lateral expansion of the approved limits of waste placement at the existing Franklin County Sanitary Landfill (Facility) in Franklin County, Ohio. The Solid Waste Authority of Central Ohio (SWACO) is the owner, operator, and applicant.

The vertical and lateral expansion will create an additional 45 million cubic yards of approved disposal capacity, which increases the total disposal capacity to 97 million cubic yards. The total acreage within the limits of waste placement will increase by 50 acres, which increases the total footprint to 333 acres. The vertical and lateral expansion will extend the landfill's life by an estimated 14 years at the AMDWR of 8,000 tons, which increases the total remaining life to 24 years.

The Facility will incorporate into its construction such features as a composite liner system (recompacted clay, and a geomembrane liner), leachate collection and management system, a surface water management system, ground water monitoring system, an explosive gas monitoring system, an explosive gas extraction system, and a final closure cap system. The permit also incorporates 30 years of post-closure care and financial assurance for closure and post-closure care.

This permit grants SWACO an exemption from Ohio Administrative Code (OAC) Rule 3745-27-07(H)(2)(d), which prohibits locating a sanitary landfill facility above an unconsolidated aquifer capable of yielding equal to or greater than 100 gallons per minute.

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

PERMIT CONDITIONS

1. The Director of the Ohio Environmental Protection Agency (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 Facility shall be constructed in strict accordance with the plans, specifications, and information submitted to the Ohio Environmental Protection Agency (Ohio EPA) which constitute this permit. There shall be no deviation from the approved permit or permit conditions without the express, written approval of 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 Facility will operate in compliance with all Ohio laws and regulations. Additional landfill components shall be installed upon orders of Ohio EPA if the Facility is inadequate or cannot meet applicable standards.
3. Issuance of this permit does not relieve the permittee of the duty to comply with all applicable federal, state, and local laws, ordinances, and regulations.
 4. This permit shall apply only to the facilities shown on the plans, specifications, and information submitted as part of PTI Application Number 18147 received on March 1, 2017, with subsequent revisions received through October 17, 2017.
 5. This permit 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.
 6. The permittee shall provide for the proper maintenance and operation of the Facility in accordance with the provisions of OAC Chapter 3745-27.
 7. Nothing in this permit shall be construed to authorize any waiver from the requirements of any applicable federal or state laws or regulations except as specified herein. This permit shall not be interpreted to release the permittee 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.
 8. This permit 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.
 9. This permit 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.
 10. Not later than seven (7) days prior to starting any construction authorized under this permit, the permittee shall submit to Ohio EPA, Division of Materials and Waste Management (DMWM), Central District Office (CDO) and Franklin County Public Health (FCPH) written notification of the anticipated construction start date

so that construction of the Facility can be routinely inspected by Ohio EPA, DMWM, CDO and FCPH.

11. The permittee shall perform the following activities during construction of the Facility in accordance with the cited provisions of OAC Chapter 3745-27 as follows:
 - a. The pre-construction tests required by OAC Rule 3745-27-08(D) shall be performed and the test results submitted to Ohio EPA, DMWM, CDO not later than seven (7) days prior to the intended use of the materials in construction.
 - b. The pre-construction interface tests required by OAC Rule 3745-27-08(G) shall be performed and the test results submitted to Ohio EPA, DMWM, CDO not later than seven (7) days prior to the use of each geosynthetic material authorized by this permit.
 - c. The construction certification report required by OAC Rule 3745-27-08(H) shall be submitted to Ohio EPA, DMWM, CDO and FCPH not later than forty-five (45) days prior to the anticipated date of waste receipt in any newly constructed areas. Pursuant to OAC Rule 3745-27-19(C)(1), the permittee shall not accept waste in a phase until Ohio EPA, DMWM, CDO provides written concurrence of the construction certification report for that phase.
12. The permittee shall provide for the following inspections and facility maintenance:
 - a. The permittee shall provide for daily inspection of the Facility and completion of the Municipal Solid Waste Landfill Daily Log of Operations, Form 3. Written results of the inspections, including any corrective actions taken, shall be made available to Ohio EPA, DMWM, CDO or FCPH upon request.
 - b. The permittee shall provide for weekly inspection of surface water control structures, including sedimentation ponds, sedimentation pond discharge structures, constructed wetlands, ditches, and culverts and completion of the Municipal Solid Waste Landfill Daily Log of Operations, Form 4. Prompt corrective actions shall be taken if necessary. Written results of the inspections, including any corrective actions taken, shall be made available to Ohio EPA, DMWM, CDO or FCPH upon request.
 - c. To ensure proper operation of the sedimentation ponds, the ponds shall be evaluated annually and cleaned out as necessary when the volume of the settled particles necessitates cleaning based on inspection results or to maintain the storage volume required by OAC Rule 3745-27-08(D)(3).

13. The Facility's authorized maximum daily waste receipt (AMDWR) is established to be eight thousand (8,000) tons. The permittee shall not accept more than 8,000 tons of solid waste for disposal at the Facility on any calendar day.
14. The permittee shall execute and fund a financial assurance instrument or increase the amount listed on the existing financial instrument in accordance with OAC Rules 3745-27-15, 3745-27-16, and 3745-27-17 for the current cost estimates of the Facility, including the costs for the newly authorized disposal area. Funding shall be completed prior to waste acceptance in any disposal area newly authorized by this permit to install.
15. The permittee shall comply with the requirements of all previously-issued authorizing documents for the Facility, except, to the extent that this permit specifies requirements different from, or in addition to, the requirements of those previously-issued authorizing documents, the permittee shall comply with this permit. This permit, and the conditions herein, shall take precedence over any conflicting requirements.

END OF PERMIT CONDITIONS

EXEMPTION

Pursuant to ORC Section 3734.02(G) and OAC Rule 3745-27-03(B), the director may, by order, exempt any person generating, collecting, storing, treating, disposing of, or transporting solid wastes, including scrap tires, from any requirement of ORC Chapter 3734 or any rules adopted thereunder if granting the exemption is unlikely to adversely affect the public health or safety or the environment.

Exemption from OAC Rule 3745-27-07(H)(2)(d) One Hundred Gallon Per Minute Aquifer System

As part of the application, SWACO has request an exemption from OAC Rule 3745-27-07(H)(2)(d), which requires that a sanitary landfill facility not be located above an unconsolidated aquifer system capable of sustaining a yield of 100 gallons per minute (gpm) for a 24-hour period to an existing or future water supply well located within 1,000 feet of the limits of solid waste placement of the sanitary landfill.

The permittee has provided information demonstrating that low-permeability glacial sediments immediately underlying the Facility and overlying the 100-gpm aquifer system provide protection to the aquifer system from impacts from the Facility. Based on the information, the total estimated vertical and lateral time of travel to downgradient receptors ranges from about 2,900 to 8,000 years.

Ohio EPA has reviewed the exemption request and for the reasons noted above has determined that granting an exemption from OAC Rule 3745-27-07(H)(2)(d) is unlikely to adversely affect public health or safety or the environment. Therefore, pursuant to ORC Section 3734.02(G), the permittee is hereby exempted from OAC Rule 3745-27-07(H)(2)(d), which requires that a sanitary landfill facility not be located above an unconsolidated aquifer system capable of sustaining a yield of 100 gpm for a 24-hour period to an existing or future water supply well located within 1,000 feet of the limits of solid waste placement of the sanitary landfill facility. This exemption shall remain in effect throughout the effective period of this permit unless otherwise revoked.

END OF EXEMPTIONS

DRAFT