



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

May 10, 2018

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

Re: **SWACO Franklin County Sanitary Landfill
Permit - Long Term
Approval
Municipal Solid Waste Landfills
Franklin County
MSWL018803**

Subject: Final Permit to Install Application for SWACO Franklin County Sanitary Landfill

Dear Mr. Reardon:

The Ohio Environmental Protection Agency, pursuant to Ohio Administrative Code Rule 3745-27-02 and the rules adopted thereunder, has reviewed the application for a permit with accompanying detail plans, specifications and/or information (hereinafter referred to as "application") regarding the above-referenced facility. This application has been approved by the Director subject to the conditions of compliance contained in the permit approval enclosed herewith and with all applicable laws, rules and standards. All construction must be supervised by an engineer or expert qualified in such work. Because the permit approval contains conditions of compliance, I urge you to read it carefully. Also, enclosed is a Response to Comments.

You are requested to submit within thirty (30) days of the date of issuance of this Permit to Install, the required permit fee balance of seventy nine thousand six hundred dollars (\$80,000.00 - \$400.00 application fee = \$79,600.00), payable to **Treasurer, State of Ohio**. Please send the required payment to:

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

Payment of the \$79,600.00 fee within 30 days is a requirement of ORC Sections 3745.11 (Q) and (V). Failure to timely submit the required permit fee will result in an assessment of late penalties.

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 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, please contact the Ohio EPA District Office to which you submitted your application.

Sincerely,



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

Enclosure

cc: Megan Ujvari, DMWM, CO
Scott Hester, DMWM, CO
Jeremy Carroll, DMWM, CO
Kristopher Weiss, PIC
Allen Hurtt, DMWM, CDO
Constance Livchak, DMWM, CDO
Jeff Gibbs, Franklin County Public Health

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

Ohio EPA MAY 10 '18
Entered Directors Journal

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: MAY 10, 2018

Effective Date: MAY 10, 2018

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 at the AMDWR and 51 years based on average current daily waste receipts.

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 requested 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) and OAC Rule 3745-27-03(B), 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



**Division of Materials and Waste Management
Response to Comments**

Subject: Franklin County Sanitary Landfill
Permit-to-Install Application 18147
Lateral and Vertical Expansion

Re: Franklin County Sanitary Landfill; Permit - Long Term; Public Response;
Municipal Solid Waste Landfills; Franklin County; MSWL018803

Agency Contacts for this Project

Division Contact: Allan Hurtt
Division of Materials and Waste Management
(614) 728-3889
allan.hurtt@epa.ohio.gov

Public Involvement Coordinator: Kristopher Weiss
Public Interest Center
(614) 644-2160
kristopher.weiss@epa.ohio.gov

Ohio EPA held a public hearing March 19, 2018 concerning a draft permit-to-install (PTI) issued to the Solid Waste Authority of Central Ohio for a vertical and lateral expansion of the Franklin County Sanitary Landfill located at 3851 London-Groveport Rd., Grove City, Ohio. This document summarizes the comments and questions received at the public hearing and during the associated public comment period, which ended March 26, 2018.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

Comment 1: **Concerns about the facility maintaining consistency with local topography and landscape.**

Response 1: Ohio's environmental laws require landfills to be designed and constructed to meet specific engineering and siting location standards to ensure protection of human health and the environment. Ohio EPA has reviewed the applicant's proposed engineering design and determined that the design meets the applicable standards. Although there is no landfill height limitation specified in the state's environmental regulations, Ohio EPA's review included an evaluation of the stability of the side slopes of the landfill, given the proposed height. The review concluded that the proposed design meets stability requirements.

Comment 2: **Residents are concerned a landfill expansion will result in decreased property values.**

Response 2: By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Land-use and zoning determinations fall under the purview of local authorities. It should be noted that this is not a new landfill development but an expansion to an existing facility and will not change existing land use designations.

Comment 3: **Concerns about the facility generating odors that can be detected by residents.**

Response 3: The owner/operator is required by the permit and the solid waste regulations to minimize and control nuisance odors. Some of the specific activities required to address odor generation include covering the waste at the end of each day and operation of a gas collection and control system (GCCS). The GCCS follows the federal New Source Performance Standards (NSPS) air pollution rules. The facility also utilizes a spray odor suppression system to control odors drifting off site. If citizens do encounter odors that they believe may be coming from the landfill, these odor concerns can be reported to Ohio EPA's regulatory partner, Franklin County Public Health at (614) 525-3799.

Comment 4: Ohio EPA received comments in support of the expansion PTI. These comments generally highlighted a need for the landfill expansion for economic purposes.

Response 4: By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Ohio EPA has reviewed the applicant's design and determined that it meets the applicable standards.

END OF COMMENTS