

**WASTE RELOCATION PLAN**

**WIN WASTE INNOVATIONS OF SENECA COUNTY LLC  
WIN WASTE INNOVATIONS OF SENECA COUNTY – NORTH UNIT  
CONTIGUOUS LATERAL AND VERTICAL EXPANSION  
SENECA COUNTY, OHIO**

**Applicant/Operator/Owner:**



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**CEC Project 307-346**

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## ATTACHMENTS

Attachment A – Standard Operating Procedure (SOP) Daily H2S Monitoring Procedures

## **1.0 INTRODUCTION**

WIN Waste Innovations of Seneca County LLC (WIN) is the owner and operator of the facility located in Loudon Township, Seneca County, Ohio. The site address is 12500 West County Road 18, Fostoria, Ohio 44830.

WIN is proposing a contiguous lateral and vertical expansion of the existing North Unit of the facility. The proposed expansion incorporates the relocation of approximately 2.0 million cubic yards of waste from the unlined Phase 1 of the North Unit to the composite liner in Phase 14 of the proposed expansion area. This Waste Relocation Plan (WRP) provides guidelines for conducting the waste relocation activities. The WRP presents the operational considerations for performing the waste relocation, including storm water and leachate management; odor, dust, and litter control; procedures for removal of the waste and tracking of the removal quantities and proposed schedule. Additionally, contingencies for unanticipated wastes are addressed.

### **1.1 SITE HISTORY OF THE NORTH UNIT**

Phase 1 of the North Unit was constructed and operated as an unlined landfill by approval of the Seneca County General Health District since approximately 1970. Permit No. 03-6324 was issued for San-Lan Landfill by Ohio EPA on March 1, 1994 for the lateral expansion incorporating composite-lined cells Phases 2 through 7. The permitted North Unit total disposal area is approximately 113 acres and provides 14.5 million cubic yards of airspace. The entire North Unit disposal area has been capped with the last cap certification report approved on January 10, 2022.

## **2.0 HEALTH AND SAFETY**

Waste relocation activities shall be performed in accordance with Federal and State requirements pertaining to worker safety. This shall include, but not be limited to, 29 CFR 1910 (General Industry Standards) and 29 CFR 1926 (Construction Industry Standards). Prior to initiation of waste relocation activities, a project-specific HASP will be prepared to address specific health and safety issues during waste excavation and relocation activities.

The Health and Safety Plans will require that the Owner or Contractor designate at least one person on-site as the project Health and Safety Officer to ensure the requirements of the HASP are met by all on-site personnel. The project Health and Safety Officer shall also interact with the Owner and the Engineer as required to update the status of the project and make decisions on upgrading or downgrading the level of protection for specific construction activities.

### **3.0 WASTE RELOCATION PROCEDURES**

#### **3.1 GENERAL**

WIN will excavate the existing waste from the Phase 1 of the North Unit and place it within the composite-lined Phase 14 of the proposed expansion. A second working face may be required during waste relocation based upon the following:

- daily gate tonnage;
- location of the working face and ability to accept additional waste;
- accessibility of construction equipment;
- weather conditions (daily and seasonal);
- contractor scheduling;
- working face safety; and
- relocation of unanticipated waste.

Waste excavation will occur until the bottom of waste elevations are reached, including any contaminated soils as determined by visual inspection. In addition, 5-foot deep test pits will be excavated on a 100-foot grid spacing to confirm that the bottom of waste has been reached.

Phase 1 contains approximately 2.0 million cubic yards of waste and soil. The Phase 1 waste relocation must be completed prior to the initial composite liner system construction within Phase 15. The amount of time necessary to relocate the waste is dependent on several factors including landfill operations, contractor availability, weather conditions, daily removal rates, health and safety considerations, whether leachate is encountered, and whether any unanticipated circumstances arise.

#### **3.2 EXCAVATION AND RELOCATION PROCEDURES**

The contractor selected to perform the work will establish procedures for excavation, transporting, dumping, compacting and covering the waste designated for relocation. General procedures for

relocating waste are outlined below. If encountered, unanticipated waste will be handled in accordance with Section 3.3.4 of this plan.

### 3.2.1 Relocation of Waste

Prior to waste relocation, temporary and permanent erosion and sedimentation control measures will be installed and the soil in the existing final cover system will be removed and stockpiled near the working face for use as daily or intermediate cover. Waste will be excavated and loaded onto trucks for transport to the working face. The trucks will be loaded in a manner to avoid material spillage and blowing litter. WIN will designate a haul route for construction vehicles transporting waste to the working face. Waste will be deposited at the working face, spread in lifts and compacted. The working face, if separate from the active working face, will be operated in accordance with OAC 3745-27-19 (minimizing areal extent, designated dumping zones, traffic management, 2-foot thick lifts, compaction, daily covering, etc.). Waste exposed at the active excavation of the waste relocation area and placed at the working face will be covered at the end of the workday with at least 6 inches of soil or a geotextile alternate daily cover. Soil will be used to cover the working face if odors become problematic.

During relocation activities, sufficient equipment will be available to handle the additional material deposited at the working face. Depending on the daily relocated waste volumes planned by the contractor, WIN may utilize the contractor assist with operations at the working face.

## 3.3 ENVIRONMENTAL CONTROLS

### 3.3.1 Odor Control

Although the waste to be relocated is up to 50-years old, excavating previously placed waste has the potential to produce odors. To minimize odors migrating off-site, the following procedures will be followed:

- Maintaining excavation areas that are as small as practically possible to minimize the volume of exposed waste during relocation operations;

- Applying soil daily cover over any exposed odorous solid waste at the end of each day and prior to project delays;
- Using odor suppressants, such as lime or odor neutralizers if necessary.
- Performing hydrogen sulfide (H<sub>2</sub>S) monitoring in accordance with the procedures in the Standard Operating Procedure (SOP) for Daily H<sub>2</sub>S Monitoring Procedures provided in Attachment A.

### 3.3.2 Dust and Litter Control

Loading and hauling excavated waste can produce dust. If necessary, the waste loading operation and haul roads will be watered to control dust emissions. Waste will be loaded into the haul vehicles in a manner to minimize spillage during transport. Litter that falls from haul vehicles on the roads will be picked up daily. Because relocated waste is typically moist, blowing waste at the relocation area is not expected to be an issue. However, litter control fencing will be installed if necessary.

### 3.3.3 Surface Water and Leachate Management

Any surface water contacting exposed waste will be handled as leachate. Surface water will be diverted from the relocation areas to minimize the potential for contacting the waste. Leachate generation formed by water contacting exposed waste will be minimized by the following practices:

- Maintaining the area of waste excavation to as small as practical;
- Maintaining positive drainage in and around the work area to prevent ponding water;
- Constructing diversion berms or drainage channels on slopes above the excavation area to divert runoff away from the area of active excavation; and
- Placement of soil cover or geotextile alternate daily cover over the exposed waste at the end of each working day

Leachate encountered in the waste excavation will be directed to a sump within the area of waste relocation and pumped to a tanker truck, the site's leachate collection system, or temporary storage tank for proper disposal.

#### 3.3.4 Unanticipated Occurrences

Due to the inherent nature of excavating previously placed solid waste, personnel involved with the project will be instructed of the potential for encountering leachate or wastes which may need special consideration for handling and disposal. Upon detection, the Contractor shall notify WIN who shall implement the notification procedures in the facility's PCB and Hazardous Waste Detection Plan, and shall manage the waste in accordance with applicable state and federal laws.

### 3.4 REMOVAL VERIFICATION

Once the waste and visibly impacted soils have been relocated, 5-foot deep test pits will be excavated at a 100-foot grid spacing to verify the bottom of the waste has been reached.

### 3.5 RESTORATION AND BACKFILLING

Following acceptable results from the removal verification, the excavated areas will be excavated or backfilled with structural fill soils based on the proposed landfill base of recompacted soil liner design elevation. Structural fill will be placed and compacted in accordance with specifications in the approved CQA/QC Plan. Areas will be seeded if additional construction is not anticipated during the same construction season.

### 3.6 QUANTITY TRACKING

The quantity of waste/soil removed from Phase 1 of the North Unit will be determined based on load counts, survey, or a combination of the two methods. Relocated waste will not be required to pass over the scales and be tracked as new waste.

## **4.0 REPORTING**

Following completion of waste relocation each year, a certification report will be prepared and submitted to the Ohio EPA. The certification report will include:

- A narrative describing the waste relocation;
- The volume of waste and soil removed for the reporting period;
- A topographic map of the completed excavation grades; and
- Documentation of the visual verification that all waste has been removed.

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**ATTACHMENT A**

**STANDARD OPERATING PROCEDURE (SOP)  
DAILY H<sub>2</sub>S MONITORING PROCEDURES**

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## 1.0 PURPOSE AND SCOPE

The purpose of this procedure is to define the methods and responsibilities for performing and documenting daily H<sub>2</sub>S monitoring as well as the procedures for use of the designated instrumentation.

## 2.0 DEFINITIONS

- 2.1 Accuracy - Closeness to the true or accepted (or nominal) value.
- 2.2 Calibration - Comparison of a measurement standard or instrument with another standard or instrument to detect, correlate, report, or eliminate by adjustment any inaccuracy of the compared.
- 2.3 Calibration Standards - The reference used to conduct a calibration. They are normally associated with a known standard, such as NIST or ISO.
- 2.4 Downwind - In the direction the wind is blowing to.
- 2.5 Effective Date - The date, after which a procedure has been reviewed and approved, that the procedure can be utilized in the field for official testing.
- 2.6 Instrumentation - Devices or systems used to measure, gauge, test, inspect, or control in order to acquire research development, test, or operational data to determine compliance with regulatory requirements.
- 2.7 ISO - International Organization for Standardization.
- 2.8 Lead Monitoring Technician: Is responsible for all activities associated with the performance and collection of data associated with the Daily H<sub>2</sub>S monitoring at Sunny Farms Landfill (SFLF).
- 2.9 Monitoring Technician: Person designated by SFLF Management to perform Daily H<sub>2</sub>S Monitoring.
- 2.10 NIST - National Institute of Standards and Technology, formerly the National Bureau of Standards.

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- 2.11** Non-Conforming Instrumentation - Equipment that no longer meets the calibration specifications under the reference standard and normally characterized as one of the following:
- 2.11.1** Out of Tolerance Instrumentation.
  - 2.11.2** Instrumentation overdue for calibration.
  - 2.11.3** Instrumentation that has been identified as "Out-of-Service".
  - 2.11.4** Instrumentation with unacceptable documentation.
- 2.12** Out-of-Service Instrumentation - Instruments that can no longer be used because of one of the following conditions:
- 2.12.1** Instrumentation that is suspected to be out of tolerance or functioning improperly.
  - 2.12.2** Instrumentation that is out of tolerance or functioning improperly.
- 2.13** Out-of-Tolerance Instrumentation - Instrumentation whose output is no longer reliable as characterized by one of the following:
- 2.13.1** Instrumentation that has outdated calibration.
  - 2.13.2** Instrumentation yielding erroneous or suspect readings.
  - 2.13.3** Instrumentation in a condition such that reliable readings cannot be taken.
  - 2.13.4** Instrumentation that is lost, stolen, or improperly maintained.
- 2.14** Regulatory Agencies – The regulatory agencies responsible for regulatory oversight of the Sunny Farms Landfill are as follows:
- 2.14.1** The Ohio Environmental Protection Agency (OEPA)
  - 2.14.2** The Seneca County General Health District (SCGHD).
- 2.15** Quality Control - The procedures and activities developed and implemented to produce products/measurements of desired quality.
- 2.16** Tolerance - The maximum allowable departure of a standard from its nominal value
- 2.17** Upwind – In the direction the wind is blowing from.
- 2.18** Wind Direction – The direction the wind is blowing from identified by the designation of N, NNE, NE, ENE, E, ESE, SE, SSE, S, SSW, SW, WSW, W, WNW, NW and NNW.

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### 3.0 RESPONSIBILITIES

#### 3.1 Lead Monitoring Technician is responsible for:

- 3.1.1 Confirming that all monitoring technicians designated to perform Daily H<sub>2</sub>S Monitoring have read and signed off on this SOP, have been trained on the use of the instrumentation and procedures specified by the Regulatory Agencies and this SOP.
- 3.1.2 Confirming that the calibration of the instrumentation is current and the instrumentation is maintained in proper working condition.
- 3.1.3 Maintaining a copy of the current calibration certificate for each instrument.
- 3.1.4 Performing Daily H<sub>2</sub>S Monitoring consistent with procedures outlined in Section 5 and Section 6 of this SOP.
- 3.1.5 Compiling and organizing all monitoring data collected.
- 3.1.6 Performing Quality Assurance (QA) audits or surveillances to verify the adequacy and implementation of procedures by the Monitoring Technicians
- 3.1.7 Notifying management with enough lead time that instrumentation is due for calibration.
- 3.1.8 Notifying management that an instrument is out of tolerance or out of service.

#### 3.2 Monitoring Technicians are responsible for:

- 3.2.1 Performing Daily H<sub>2</sub>S Monitoring consistent with procedures outlined in Section 5 and Section 6 of this SOP.
- 3.2.2 Confirming that equipment is maintained and in proper working condition.

### 4.0 PREREQUISITES, PRECAUTIONS AND LIMITATIONS

#### 4.1 PREREQUISITES

- 4.1.1 The Lead Monitoring Technician shall confirm that suppliers contracted to calibrate and repair the instrumentation are qualified to perform such calibrations and repairs and are approved by the instrumentation manufacturer to do so whenever possible.
- 4.1.2 Selection of measuring and test equipment shall be based on the type, range, accuracy, and tolerance needed to accomplish the measurements necessary for determining conformance to specified procedures.

#### 4.2 PRECAUTIONS AND LIMITATIONS

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**4.2.1** This SOP covers the activities associated with the performance and collection of the Daily H<sub>2</sub>S Monitoring data. This SOP does not cover the report preparation and submittal to the regulatory agencies.

**4.2.2** The quality assurance controls discussed in this procedure are applicable when SFLF directly controls measuring and Instrumentation. If control of measuring and instrumentation activities is subcontracted to outside organizations, the SFLF Environmental/Compliance Department shall confirm that equivalent controls are in place and implemented by the subcontractor in accordance with written and approved procedures.

## 5.0 PROCEDURE

### 5.1 Overview

**5.1.1** Sunny Farms Landfill currently is required to perform Daily H<sub>2</sub>S Monitoring pursuant to the Directors Interim Findings and Orders (DIFO) issued by the OEPA on January 31, 2019 specifically, **Condition #14 - Odor Monitoring Systems.**

- During each day (seven (7) days a week), ambient monitoring will be conducted at designated locations, (One (1) on Property Line, two (2) on the first public Right of Way and three (2) on the second public Right of Way selected based on wind direction centralized on the approximate center of the southern landfill disposal unit. Monitoring will be conducted twice per day.
- The first monitoring event will be completed between 5:00 am and 8:00 am.
- The second monitoring event will be completed between 5:00 pm and 11:00 pm.
- The DIFO provides provisions to reduce monitoring to exclude weekends. Should these conditions be met, and monitoring is reduced to Five (5) days a week the Monitoring Technicians will be notified of this by SFLF Management. Unless specifically notified by SFLF Management as to this change, monitoring will continue to be done seven (7) days a week.
- The Field Odor Monitoring Form to be used during the monitoring is provided as Attachment 1.
- The Field Odor Monitoring Map to be used during the monitoring is provided as Attachment 2.

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- Currently a Jerome J605 H<sub>2</sub>S Meter, manufactured by Arizona Instruments is utilized for obtaining H<sub>2</sub>S readings. This meter shall be operated in accordance with the Manufacturers Operation Manual.

## 5.2 Daily H<sub>2</sub>S Monitoring Preparation and Setup,

**5.2.1** Prior to use each day the Instrumentation shall be regenerated in accordance with the Manufacturers Operation Manual to clear any residual or absorbed H<sub>2</sub>S from the gold film sensor. This process takes 45 minutes (10 min regen and 35-minute cool down). Under no circumstances shall this procedure be interrupted or skipped. The instrument must remain connected to the charger and plugged into a power source during this entire process.

**5.2.2** Upon completion of the regeneration process a warmup of the instrument shall be performed in accordance with the Manufacturers Operation Manual. During this warmup process a Zero Air Filter will be inserted into the instruments sample port to insure only clean air is entering the instrument.

**5.2.3** During the warmup process the Monitoring Technician will obtain the pertinent weather data from the SCADA System and entered on the Field Odor Monitoring Form provided as Attachment 1. The Monitoring Technician will record the following:

- Date
- Day of the Week
- AM or PM Monitoring Event
- Average Temperature (°F)
- Average Humidity (%) and;
- Average Barometric Pressure (In/Hg).
- Average Wind Speed (mph)
- Wind Direction (directional Format)

**5.2.4** The wind direction is critical to determining the monitoring locations for the monitoring event. The Monitoring Technician shall obtain the wind direction from the SCADA screen (in degrees) and compare that to the wind rose chart, provided as Attachment 3, which converts the wind direction from degrees to directional format (e.g. 0°=N, 90°=E, 180°=S and 270°=W). The wind direction shall then be recorded on the Field Odor Monitoring Form in directional format (N, NNE, NE, ENE, E, ESE, SE, SSE, S, SSW, SW, WSW, W, WNW, NW or NNW).

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**5.2.5** Once the wind direction is recorded the sampling direction is determined by looking at the Field Odor Monitoring Map provided as Attachment 2 and identifying the monitoring sector that is downwind from the wind direction. To make things easier the wind directions shown on Attachment 2 show the direction the wind is blowing from.

**5.2.6** During very low wind speeds, the wind direction indicator may not stabilize in any particular wind direction such that a downwind location cannot be determined. Should this anomaly occur, monitoring will proceed to the major compass points (N, S, E and W) at the property line points. If any of these readings exceed 15 ppb, normal sampling shall continue in that direction. If no readings are observed above 15 ppb at the four major compass points, no further sampling will be taken at that location.

### **5.3** Daily H<sub>2</sub>S Monitoring

**5.3.1** Once the wind direction has been identified Odor Monitoring can begin. The Field Odor Monitoring Map (Attachment 2) shows the pre-determined monitoring points for each monitoring sector. The Field Odor Monitoring Form has the following information for each monitoring point pre-recorded:

- Point Identification Number
- Location
- Latitude and;
- Longitude.

Odor monitoring is to begin within 15 minutes of obtaining the wind direction. Should for any reason monitoring does not begin within 15 minutes of determining the wind direction, the wind direction shall be reverified prior to commencing monitoring activities. If this occurs and the wind direction changes the monitoring sector will be adjusted to meet the new downwind direction.

**5.3.2** Once at the monitoring location a reading is to be obtained and recorded on the Field Odor Monitoring Form (Attachment 1) along with the time of the reading.

**5.3.3** Reading will be obtained with a Jerome J605 H<sub>2</sub>S Meter in accordance with the Manufacturers Operation Manual.

**5.3.4** Should any initial reading show 15 ppb or less then the reading and time will be recorded. Should an initial reading exceed 15 ppb then the Monitoring

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Technician may obtain two more readings within a three-minute interval and record the average value.

**5.3.5** Should any reading or average of 3 readings exceed 15 ppb, the Monitoring Technician shall notify the Lead Monitoring Technician of the reading immediately upon completion of the monitoring event.

## **6.0 SAFETY**

### **6.1 Overview**

The Monitoring Technician shall be aware of all potential safety hazards associated with performing Daily Odor Monitoring. During Monitoring the Monitoring Technician shall drive on public roads while stopping frequently along the side of the road to perform monitoring. Readings will be obtained from the side of the road in most cases and safety was a factor in determining pre-selected locations over even spacing of locations. Aside from following standard traffic safety laws the Monitoring Technician will also abide additional safety rules outlined in this section.

### **6.2 Vehicles and Equipment**

**6.2.1** Vehicles used during Daily H<sub>2</sub>S Monitoring shall be in good working order. The Monitoring Technician will check the tire pressure, turn signals, hazard lights prior to conducting a monitoring event.

**6.2.2** The vehicle used shall be equipped with a yellow strobe light that is operational.

### **6.3 Procedure.**

**6.3.1** The Monitoring Technician will always have the yellow strobe light operating when performing a monitoring event.

**6.3.2** When approaching a designated monitoring location, the Monitoring will use his turn signal and pull completely off the road. Once off the road the Monitoring Technician will activate the vehicles safety hazard lights and turn off the vehicle engine.

**6.3.3** The Monitoring Technician will remain alert of all traffic in both directions.

**6.3.4** If leaving the vehicle, the Monitoring Technician will wear appropriate High Visibility reflective clothing such as safety vest, shirt or coat.

**6.3.5** After reading is obtained the Monitoring Technician will turn off the vehicle's safety hazard lights, restart the engine, turn on the appropriate turn signal and cautiously re-enter the drive lane of the road, yielding to any traffic.

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**7.0 RECORDS**

- 7.1 All original Field Odor Monitoring Forms and maps will be kept in a 3-ring binder and maintained at the landfill.
- 7.2 The Lead Monitoring Technician will enter or assign someone to enter the information into a digital data base.

**8.0 REFERENCES**

- 8.1 Ohio Environmental Protection Agency – Final Findings and Orders of the Director dated January 31, 2019.
- 8.2 JEROME® J605 Hydrogen Sulfide Analyzer Operation Manual – Arizona Instrument L.L.C.





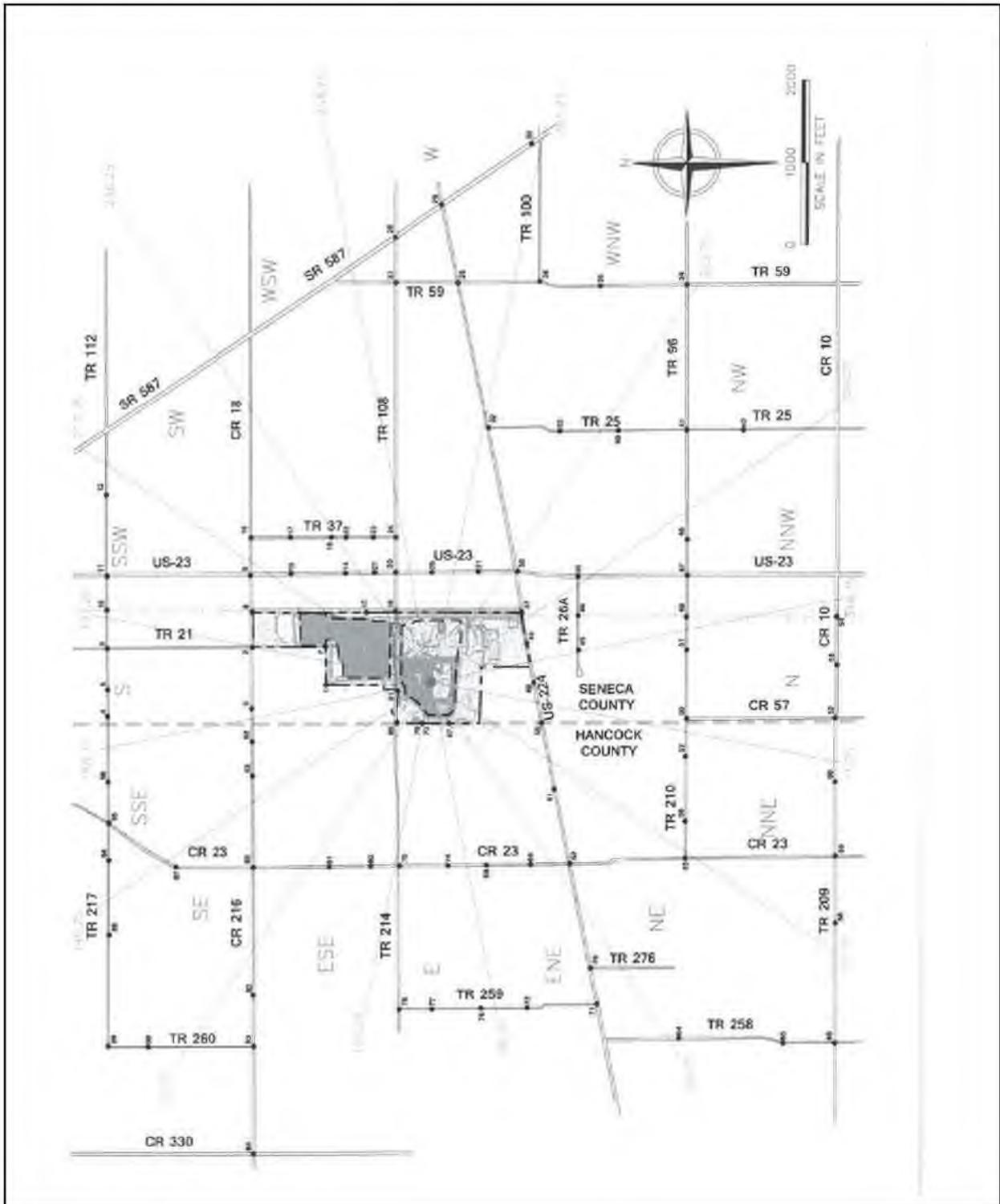
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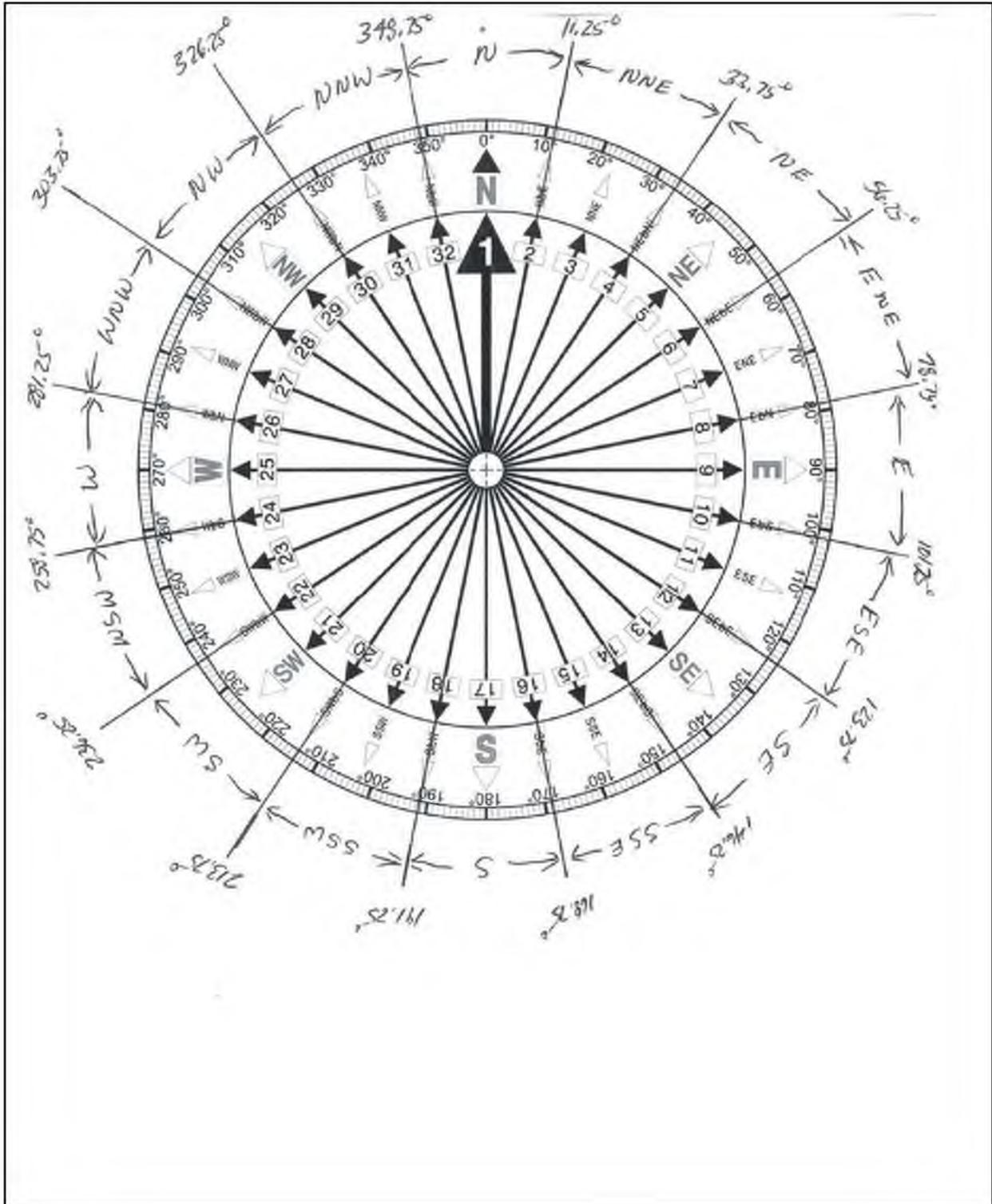
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9.2 Attachment 2 – Field Odor Monitoring Map



Daily H<sub>2</sub>S Monitoring Procedure

9.3 Attachment 3 - Wind Rose



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## 10.0 REVISION HISTORY

Revision	Date	Comment
0	3/2/2019	Initial Document

