



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

OHIO E.P.A.

AUG 12 2014

FILED DIRECTOR'S JOURNAL

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: [Signature] Date: 8-12-14

AUG 12 2014

Mr. David Brausch
 Brausch Farms
 1715 Gum Grove Rd.
 Clarksville, OH 45113

RE: Brausch Farms
 Director's Authorization
 Approval
 Composting
 Warren County
 CM010518

**Subject: Brausch Farms, Class II Composting Facility, Warren County
 Approval of Alternative Bulking Agent**

Dear Mr. Brausch:

In accordance with Paragraph (A) of Ohio Administrative Code (OAC) Rule 3745-560-205, the owner or operator of a Class II solid waste composting facility may compost alternative bulking agents after approval by the Director of the Ohio Environmental Protection Agency (Ohio EPA). On June 27, 2014, Ohio EPA received a request (Request) from Brausch Farms seeking approval to use diatomaceous earth from Cargill, Incorporated as an alternative bulking agent at their Class II solid waste composting facility (Facility). Additional information regarding the diatomaceous earth was received through July 9, 2014. The Facility is located at 1715 Gum Grove Road in Clarksville, Warren County, Ohio.

Diatomaceous earth consists of fossilized remains of diatoms, a type of hard-shelled algae. The Cargill diatomaceous earth is used in the filtration of dextrose syrup. The diatomaceous earth is sucked onto the surface of a rotating drum filter, over a porous cloth, by a vacuum. As the drum rotates, the diatomaceous earth filter rotates into a vat of dextrose syrup. The vacuum pulls the syrup from the vat through the diatomaceous earth filter cake, removing the largest and least soluble materials from the syrup, mainly filter protein, color, and solids. The purified syrup is sucked through the drum and sent to the next step in the manufacturing process. The material trapped on the outside of the diatomaceous earth filter cake remains there until the drum rotates around to a knife that cuts off the impurities trapped on the outside of the filter cake, exposing clean filter cake ready to re-enter the vat and filter more syrup.

The dry filter cake of diatomaceous earth, as described in the Request and additional information submitted through July 9, 2014, is hereby approved by Ohio EPA as an

alternative bulking agent for composting at the Class II solid waste composting facility located in Clarksville, Ohio, subject to the following conditions:

1. The alternative bulking agent shall be managed in accordance with the Request and additional information submitted through July 9, 2014; OAC Rules 3745-560-01 through 3745-560-435, "Solid Waste Composting Regulations"; OAC Rule 3745-15-07, "Air Pollution Nuisances Prohibited"; and Ohio Revised Code (ORC) Chapter 6111, "Water Pollution Control."
2. Only dry cakes of diatomaceous earth as described in the Request and additional information submitted through July 9, 2014 shall be accepted as an alternative bulking agent at the Facility. Dry cakes of diatomaceous earth meeting the same specifications may be accepted from other companies upon notification to Ohio EPA Central Office (CO), Division of Materials and Waste Management (DMWM) and Ohio EPA Southwest District Office (SWDO), DMWM at least three (3) days prior to receiving the initial load of the alternative bulking agent.
3. Ohio EPA representatives may enter the Facility during reasonable times, in accordance with applicable law, to inspect, conduct tests, or examine records and reports concerning the use of the alternative bulking agent and compliance with this authorization.
4. If, in the judgment of Ohio EPA, the owner or operator is unable to abate nuisance conditions or has not complied with the conditions of this authorization, then the owner or operator shall, upon written notification, cease acceptance of the alternative bulking agent and dispose of all material containing the alternative bulking agent at a licensed solid waste landfill.
5. Testing requirements shall be fulfilled after the alternative bulking agent mixture has completed the thermophilic and curing stages of composting. The owner or operator shall have the cured compost tested for the parameters specified in Tables 1, 2, 3, and 4 of OAC Rule 3745-560-230.
6. Cured compost that does not exceed the quality standards limits specified in Tables 1, 2, 3, and 4 of OAC Rule 3745-560-230 may be distributed for unrestricted use.
7. Cured compost that does not meet the quality standards limits specified in Tables 1, 2, 3, and 4 of OAC Rule 3745-560-230 shall be:
 - a. Recirculated into the composting process; or
 - b. Disposed of at a licensed solid waste disposal facility.

8. This approval for alternative bulking agent shall terminate upon closure of the Facility and/or non-renewal of the annual operating license.
9. This alternative bulking agent approval is issued solely to Brausch Farms, and is not transferable upon change of ownership. No other persons may utilize the materials which are specified in this approval at the Facility located at 1715 Gum Grove Road in Clarksville, Ohio.

Issuance of this alternative bulking agent approval does not constitute expressed or implied agreement that the monitoring of the facility performed and implemented in accordance with this alternative bulking agent approval, and/or its terms and conditions, will constitute compliance with applicable state and federal laws, rules, and regulations. Nor does issuance of this approval assure that necessary operating permits or licenses will be granted.

You are notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions concerning this letter, please contact Phil Cherosky in the Ohio EPA Central Office at (614) 644-3249.

Sincerely,



Craig W. Butler
Director

cc: Tracy Buchanan, DMWM, SWDO
Joe Bunge, Cargill Dayton