



OHIO E.P.A.

OCT - 1 2013

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

ENTERED ELECTRONIC JOURNAL

CERTIFIED

October 1, 2013

Milliron Waste Management, Inc.
Attn: Mr. Jeff DeVito
1700 North Main Street
Mansfield, Ohio 44903

Re: Permit for Land Application Management Plan to Use Gypsum Molds as an Agricultural Soil Amendment, as Engineered Fill, and in Cement Production and Vitrified China as Construction Aggregate and as Engineered Fill

Application Received: July 3, 2013

Issuance Date: October 1, 2013

Effective Date: October 1, 2013

Expiration Date: September 30, 2018

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: Donna Cassler Date: 10-1-13

Dear Mr. DeVito:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the Land Application Management Plan (LAMP) permit application dated July 2, 2013 submitted by Hull and Associates, Inc., on behalf of Milliron Waste Management, Inc. (Milliron) pursuant to Chapter 6111 of the Ohio Revised Code (ORC). The LAMP permit application proposes to beneficially use gypsum molds and vitrified china generated by Mansfield Plumbing Products, LLC at its production plant (the Facility) located at 150 East First Street in Perrysville, Ohio. The LAMP permit application proposes to beneficially use gypsum molds as an agricultural soil amendment, as engineered fill, and in cement production and to beneficially use vitrified china as construction aggregate and as engineered fill. The gypsum molds and the vitrified china will be processed by Milliron to produce the appropriate size material for use as construction aggregate, as engineered fill, in cement production, or for land application and to remove any unwanted materials such as plastic spacers from the gypsum molds.

Pursuant to the authority of the Director of Ohio EPA (Director) under ORC Chapter 6111, the LAMP permit application for Milliron dated July 2, 2013 is approved subject to compliance with all of the conditions below. Further, I have determined that granting an exemption from the applicable solid waste provisions of ORC Chapter 3734 to use gypsum molds and vitrified china, in the quantities and under the circumstances specifically authorized in this LAMP permit, is unlikely to adversely affect the public health or safety or the environment. Therefore, pursuant to ORC Section 3734.02(G),

Milliron and any recipient of gypsum molds or vitrified china under this LAMP permit are hereby exempted from the applicable solid waste provisions of ORC Chapter 3734 and rules adopted thereunder specific to the land application and beneficial use of gypsum molds or vitrified china as authorized in this LAMP permit.

CONDITIONS

1. The Milliron LAMP permit is approved for the beneficial use of gypsum molds generated by the Facility as an agricultural soil amendment, as engineered fill, in cement production, and vitrified china generated by the Facility as construction aggregate and as engineered fill in accordance with the LAMP submitted on July 2, 2013, which is attached and incorporated herein. All other beneficial uses must be separately approved by Ohio EPA. Only gypsum molds and vitrified china from the Facility, as identified in this LAMP, are eligible for beneficial use under this permit.
2. The Director, or his authorized representative(s), may enter upon Milliron processing operation site at any reasonable time for the purpose of conducting inspections, collecting samples of gypsum molds and vitrified china, conducting tests, or examining records or reports pertaining to the generation or beneficial use of gypsum molds and vitrified china from the Facility as an agricultural soil amendment, as engineered fill, in cement production, and as construction aggregate.
3. Issuance of this LAMP permit does not relieve Milliron of the duty to comply with all applicable federal, state, and local laws, ordinances, and regulations except as authorized herein.
4. Milliron shall notify Ohio EPA if Milliron becomes aware of a substantial change in, or does substantially change, the generating process or if the raw materials used in the generating process of the gypsum molds or vitrified china change. This LAMP permit does not authorize beneficial use of gypsum molds and vitrified china generated by the substantially changed process or raw materials unless authorized by Ohio EPA based on review of characterization data of gypsum molds and vitrified china generated under the changed process or raw materials. Under such circumstances, the Director may request that Milliron submit a revised LAMP permit application for approval. For the purposes of this LAMP permit, a substantial change in the raw materials is a change to lower quality raw material which results in gypsum molds or vitrified china with additional pollutants or a higher concentration of pollutants.
5. The following shall be maintained by Milliron for a minimum of 5 years after the beneficial use of the gypsum molds and vitrified china and made available to Ohio EPA upon request:

- a. Records of the annual volume of gypsum molds and vitrified china that are beneficially used;
 - b. Records identifying the recipients or distributors of the gypsum molds and vitrified china and the volume provided to each recipient or distributor during the previous year;
 - c. A sampling plan detailing where samples of gypsum molds and vitrified china are to be collected, how those samples are to be collected, how frequently those samples are to be collected, and a list of parameters that are used to characterize the samples, as required in Conditions 6 through 9;
 - d. All laboratory reports of all characterizations of the gypsum molds and vitrified china;
6. Milliron shall collect and analyze at least one sample per year of the gypsum molds and vitrified china intended for beneficial use and Milliron shall collect and analyze additional samples if there are substantial changes in the generation process or the raw materials used.
- a. The samples collected shall be representative of the gypsum molds and vitrified china beneficially used for the calendar year.
 - b. Milliron shall have the sample(s) analyzed for the pollutants listed in the table in Condition 7.
 - c. The reported detection limit for the analysis shall be below the limit specified for each pollutant in the table in Condition 7.
 - d. Milliron shall employ analytical methods that generate pollutant results in units consistent with the units in the table in Condition 7.
7. At a minimum, the gypsum molds and vitrified china intended for beneficial use shall be analyzed for the pollutants specified in the following table. Milliron shall not designate, make available, or distribute for beneficial use any gypsum molds or vitrified china that exceeds any pollutant(s) specified in the following table.

POLLUTANT	TOTALS LIMIT (mg/kg)	LEACHING LIMIT (mg/L)
Aluminum	77,000	4.0
Arsenic	41	0.20
Cadmium	39	0.10
Copper	1,500	26
Lead	300	0.30
Mercury	10	0.040
Nickel	420	14
Selenium	100	1.0
Zinc	2,800	200
Barium	15,000	40
Beryllium	160	0.080
Chromium	180,000	2.0
Thallium	0.78	0.040

8. Ohio EPA reserves the right to add pollutants to this list as it deems necessary.
9. Milliron shall analyze gypsum molds for the parameters necessary for users to determine appropriate maximum agronomic application rates. Guidance materials from Ohio State University Extension and USDA-NRCS will be used to determine appropriate maximum application rates.
10. Each year, Milliron shall submit a report regarding the beneficial use of the gypsum molds and vitrified china for the previous calendar year. The annual report shall include the total amount, in tons, of the gypsum molds and vitrified china sold or distributed for beneficial use and the analytical results for any analysis(es) performed pursuant to Condition 7.
11. Milliron shall include in the annual report required in Condition 10 the following:

"I certify, under penalty of law, that the information used to determine compliance with the requirements contained in Chapters 3734. and 6111. of the Ohio Revised Code, and all rules thereunder, for the period beginning (insert date of last certification statement) and ending (insert current certification statement date) was prepared under my direction and supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."
12. The certification statement shall be signed by one of the following persons: In the case of a corporation, by a principal executive officer of at least the level of vice president or the principal executive officer's duly authorized representative, if such representative is responsible for the overall operation of the facility. In the

case of a partnership, a general partner. In the case of a sole proprietorship, the proprietor. The signature shall constitute personal affirmation that all statements or assertions of fact in the records are true and complete and comply fully with applicable state requirements and shall subject the signatory to liability under ORC Section 2921.13.

13. The annual report shall be sent to the following address:

Ohio EPA
Division of Materials & Waste Management - AAEU
P.O. Box 1049
Columbus, OH 43216-1049

14. Storage and beneficial use of the gypsum molds and vitrified china shall not create a nuisance and shall not adversely affect public health or safety or the environment. Should a nuisance condition develop, or a determination be made by Ohio EPA that storage or land application of the gypsum molds and vitrified china is a threat to public health or safety or the environment, this LAMP permit to beneficially use the gypsum molds and vitrified china may be revoked upon written notification from the Director. Immediately upon the effective date of any such revocation, Milliron shall cease storage and distribution of the gypsum molds and vitrified china for beneficial use under this LAMP permit. Furthermore, storage or beneficial use of gypsum molds or vitrified china that creates a nuisance or adversely affects public health or safety or the environment may subject Milliron, the users, and/or the distributors to enforcement by Ohio EPA.
15. Milliron shall notify Ohio EPA in writing not later than seven days after discovering noncompliance with this LAMP permit.
16. Milliron shall supply distributors and end users with a copy of this LAMP permit approval.
17. The Director may add, delete, or change any conditions of this LAMP permit to protect public health or safety or the environment.
18. This permit to beneficially use gypsum molds and vitrified china shall expire at midnight on the expiration date shown above. In order to renew the permit to beneficially use gypsum molds and vitrified china beyond the above date of expiration, Milliron shall submit such information and forms as are required by Ohio EPA not later than 90 days prior to the above date of expiration.

The gypsum molds and vitrified china shall be beneficially used in strict accordance with the conditions of this LAMP permit and as outlined in the permit application submitted for this approval to the Director. Approval of this LAMP permit does not constitute an assurance that use of the gypsum molds and vitrified china in accordance with the LAMP permit will be in compliance with all Ohio laws and regulations.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC 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

Sincerely,



Scott J. Nally
Director

PF

Attachment: LAMP

cc: Jeff Hurdley, Legal, CO
Bill Fischbein, Legal, CO
John Pasquarette, NWDO
Matt Work, Mansfield, Ontario, Richland County Health Department

ALTERNATIVE WASTE MANAGEMENT PROJECT REQUEST

The Integrated Alternative Waste Management Program (IAWMP) is the means to obtain prior authorization for alternative waste disposal projects pursuant to OAC rule 3745-27-05(A)(4). Authorized alternative waste disposal projects include the placement of solid waste into or on the ground, such as engineered fill or land application. Incorporation of appropriate waste material into the manufacture of a final product is not considered disposal, and therefore not regulated by the agency. Contact the Division of Materials and Waste Management (DMWM) at (614) 644-2621 for more information.

APPLICANT (PERSON RESPONSIBLE FOR THE PROJECT) INFORMATION

Name: Jeff DeVito
Company (if applicable): Milliron Waste Management, Inc.
Street Address: 1700 North Main
City: Mansfield
County: Richland
State: Ohio
Zip: 44903
Phone: 419-747-6565
Email: jdevito@millironind.com
Alternative Contact Person: [Click here to enter text.](#)



GENERATOR INFORMATION

Name: Fillipe Mejia
Company (if applicable): Mansfield Plumbing Products
Street Address: 150 E 1st St.
City: Perrysville
County: Richland
State: Ohio
Zip: 44864
Phone: 419-938-1343
Email: FMejia@mansfieldplumbing.com
Alternative Contact Person: [Click here to enter text.](#)

If the generator is different than the applicant, attach generator's written consent to use the waste in this project. Also attach statement from generator describing efforts to minimize waste generation.

PROPERTY OWNER INFORMATION

Name: **Various – See Attachment A**
Company (if applicable):
Street Address:
City:
County:
State:
Zip:
Phone:
Email:
Alternative Contact Person:

If the property owner is different than the applicant, attach written consent of the property owner to dispose of solid waste at this location. List multiple property owners on a separate sheet.

Upon review of this request Ohio EPA's DMWM may require additional narratives, plan drawings, and/or detailed engineering plans. Examples include, but may not be limited to, the following information:

A flow diagram and narrative describing the process producing the waste

Location and limits of project site and all waste storage areas

(If this project is at a solid waste facility this could include plan view drawings identifying footprint of existing waste, proposed locations of waste placement in this project, and all waste storage areas)

Hydrologic characterization

Location and limits of regulatory floodplain

Existing topography showing adjacent lakes, streams, wetlands, springs, or other surface waters

Depth to the uppermost aquifer system and lowest elevation of waste placement

Aquifer boundaries declared by the U.S. government under the Safe Drinking Water Act to be a sole source aquifer

Limits of any unconsolidated aquifer systems delineated on the Ohio Department of Natural Resources (ODNR) ground water resource maps as yielding at least 100 gallons per minute

Ohio EPA-endorsed wellhead protection area and any public or private water supply well

Stormwater run-on/run-off control measures

Total acreage of project site and boring logs for large volume land application projects

A list of the permits, licenses, plan approvals, authorizations or other approvals that have been or may be applied for and the local, state, or federal office where application has been or may be made

Location and boundaries of any natural areas listed below:

National parks or national recreation areas and state parks or state recreation areas;

Areas listed by ODNR as a state nature preserve, state wildlife area, or state scenic river;

Areas designated, owned, and managed by the Ohio Historical Society as a nature preserve;

Areas designated by the U.S. Forest Service as a special interest area or natural research area in the Wayne National Forest;

Stream segments designated by Ohio EPA as a state resource water, a coldwater habitat, or an exceptional warm water habitat.

OHIO EPA CENTRAL OFFICE
50 West Town Street, Suite 700
Columbus, Ohio 43215
614-644-2621

APPROVED
OHIO ENVIRONMENTAL PROTECTION AGENCY
OCT 01 2013
AS EVIDENCED BY COPY OF
LETTER OF APPROVAL
HERETO ATTACHED