



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

OHIO E.P.A.

APR 19 2013

ENTERED DIRECTOR'S JOURNAL

CERTIFIED

April 19, 2013

Mr. Jim Bates
Village of Sebring
Water Department
135 E. Ohio St.
Sebring, Ohio 44672

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: William McNeal Date: 4-19-13

Re: Statewide Land Application Management Plan Approval for Conditioned Alum Residuals from the Sebring Water Plant
Application Received January 9, 2013

Effective Date: April 19, 2013

Expiration Date: April 18, 2018

PERMITTEE:

Dear Beneficial Use Manager:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the land application management plan (LAMP) approval request submitted on January 9, 2013 by the Village of Sebring pursuant to Chapter 6111 and 3734 of the Ohio Revised Code (ORC) for the proposed beneficial use of Conditioned Alum Residuals (CAR) generated by the Sebring Water Plant in Sebring, Ohio. The submitted LAMP approval request proposes to beneficially use CAR, which consists of alum residuals from drinking water treatment, for soil blending. Once conditioned, the CAR will be incorporated into soil blends and sold as a commercial landscaping material by local commercial topsoil blenders. Pursuant to the authority of the Director of Ohio EPA (Director) under ORC Chapter 6111 and 3734, this LAMP permit request for the Village of Sebring is approved subject to compliance with all conditions below.

Pursuant to ORC Section 3734.02(G), the Director hereby exempts the Village of Sebring and any recipient of soil amended with the Village of Sebring's CAR under this LAMP approval from the applicable solid waste provisions of ORC Chapter 3734 and rules adopted thereunder specific to the land application of CAR as authorized in this approval. The Director has determined that granting an exemption from the applicable solid waste provisions of ORC Chapter 3734 to use CAR in quantities and under the

circumstances specifically authorized in this LAMP approval is unlikely to adversely affect the public health and safety or the environment.

This approval authorizes the Village of Sebring to beneficially use CAR from the Village of Sebring for soil blending in accordance with the LAMP request submitted on January 9, 2013 which is attached and incorporated herein. The CAR may be mixed with soil and shall comprise no more than thirty percent of the soil blend. All other beneficial uses must be separately approved by Ohio EPA. Only CAR from the Village of Sebring as identified in this management plan is eligible for beneficial use under this permit. The Director, or his authorized representative(s), may enter upon the premises of the Village of Sebring's drinking water treatment plant or any site where CAR/soil amending takes place, at any reasonable time, for the purpose of conducting inspections, collecting samples of CAR and soil blends mixed with CAR, conducting tests, or examining records or reports pertaining to the soil blending process of the Village of Sebring.

Issuance of this approval does not relieve the Village of Sebring of the duty to comply with all applicable federal, state, and local laws, ordinances, and regulations.

The Village of Sebring shall notify Ohio EPA if they anticipate a change in, or does change, the generating process or if the raw materials used in the generating process of the CAR change. Under such circumstances, the Director may request that the Village of Sebring submit a revised LAMP application for approval.

The following records shall be maintained by the Village of Sebring for a minimum of 5 years and be made available to Ohio EPA upon request:

- 1) The name, address, and telephone number of all companies receiving CAR from the Village of Sebring for soils blending.
- 2) A description of the process, including raw materials, used to generate the CAR and soils amended with CAR.
- 3) Records of the annual volume of CAR and CAR-amended soil that is designated for beneficial use under this approval.
- 4) A sampling plan detailing where samples of CAR and/or CAR-amended soil are to be collected, how frequently those samples are to be collected, and a list of parameters and test methods that are used to characterize the samples.
- 5) All laboratory reports of all characterizations of the Village of Sebring's CAR.
- 6) A statement authorizing Ohio EPA staff to conduct inspections, collect samples, conduct tests, or examine records pertaining to the generation of CAR or CAR-amended soil.

By January 31 of each year, the Village of Sebring shall submit a report identifying the materials characterization and the beneficial use activities of CAR management performed for the previous calendar year. At a minimum, the annual report shall include the beneficial use (soil blending) along with the dry tons used for that beneficial use and the analytical results for the previous calendar year's materials characterization.

The annual report shall be accompanied by the following annual certification:

"I certify, under penalty of law, that the information contained in this annual report that will be used to determine compliance with the requirements contained in Chapters 6111 and 3734 of the ORC, 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."

The first annual certification statement shall encompass the period beginning on the effective date of this approval to the end of the year. The certification statement shall be signed by either a principal executive officer or ranking elected official with the Village of Sebring or its drinking water treatment facility.

The annual report shall be sent to the following address:

The Ohio Environmental Protection Agency
Division of Materials and Waste Management
PO Box 1049
Columbus, OH 43216-1049

Storage and blending of the CAR shall not create a nuisance and shall not adversely affect public safety or health or the environment. Should a nuisance condition develop, or a determination be made by Ohio EPA that storage or blending of CAR is a threat to human health or the environment, the permission to use this material may be revoked upon written notification from the Director. Immediately upon the effective date of any such revocation, the Village of Sebring shall cease blending of the CAR.

The Village of Sebring shall not cause pollution or cause any CAR to cause pollution to any waters of the state. The Village of Sebring shall only discharge to waters of the state in accordance with an effective national pollutant discharge elimination system (NPDES) permit. Any unauthorized discharges to waters of the state must be reported to Ohio EPA (call 1-800-282-9378) within 2 hours of discovery.

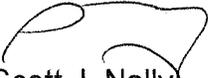
The director shall be notified in writing within seven days if the Permittee discovers noncompliance with this LAMP approval. The Director may add, delete, or change any conditions to a LAMP permit to protect human health or the environment.

This authorization to beneficially use CAR from the Village of Sebring shall expire at midnight on the expiration date shown above. In order to receive authorization to beneficially use CAR beyond the above date of expiration, the Village of Sebring shall submit such information and forms as are required by Ohio EPA no later than 90 days prior to the above date of expiration.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the ORC. 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 which the Commission, in its discretion, may reduce 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

SN/DH/ljm

Attachment: LAMP

cc: Scott Hershberger, Emerald Environmental
Jeff Hurdley, Legal, CO
Bill Fischbein, Legal, CO
Virginia Wilson, DSW, NEDO
Natalie Oryshkewych, DMWM, NEDO



Plan Approval - Management Plan For Sludge or Industrial Byproducts other than Treated Sewage

Note: This form, with the attachments indicated, is intended to serve as the main substance of the management plan. If you prefer to submit a separate and complete document to serve as your management plan, then to respond to a question where a description or calculation is requested (such as Items C.1 through C.4), simply enter the page numbers of the submitted plan where the information requested can be found. Please respond on this form when just a check mark or brief statement is requested.

FOR AGENCY USE ONLY		APPROVED OHIO ENVIRONMENTAL PROTECTION AGENCY APR 19 2013
Application Number:	Date Received: / /	
Applicant:	Village of Sebring	AS EVIDENCED BY COPY OF LETTER OF APPROVAL HERETO ATTACHED
Facility Owner:	Same	
Application/Plans Prepared by:	Emerald Environmental	
Project Name:	Water Treatment Residuals Reuse	

A. Background Information

a. Briefly describe type and source of material to be land applied: Conditioned Alum Residuals

b. Briefly describe proposed uses of materials (agronomic uses, soil blends, structural fill, etc.): Soil Blends

c. Existing Plan Approval number: _____ N/A

B. Generating Facility N/A

a. Amount of sludge/byproduct generated up to 5,000 dry tons/year

b. Amount proposed for beneficial use up to 5,000 dry tons/year

c. Disposal method for amount not used N/A

d. Storage capacity at facility: in excess of 1,825 days

C. Land Application (If N/A, Skip to D) N/A

a. Use category of land application area (check all that apply): Unrestricted Access site Restricted Access site

b. Quantity of material to be land applied:
 _____ Inches/acre/year (annual average-liquid) _____ Dry tons/acre/year (annual average-sludge)

c. Does the land application area have subsurface drains/tiles located less than 24 inches below natural grade?
 Yes No Unknown at this time

d. Amount of land area available for land application if known (do not include buffer zones in the figure) _____ N/A acres

e. Maximum slope of land to be used for land application = _____ %

f. Type(s) of crops or vegetation to be grown on land application area: Landscaping or other vegetative cover

C.1 Describe the method or methods used for the storage and land application of sludge/other byproducts (including detailed information about the distribution system):

Conditioned Alum Residual (CAR) is a dewatered Water Treatment Residual (WTR) that contains in excess of 55% solids and possesses moisture retention and physical soil structure benefits. Dewatered WTR is currently stored at the Sebring Water Plant located at 1191 Knox School Road in Beloit, Mahoning County, Ohio. Once conditioned, this loose, dry material will be incorporated into soil blends and sold as a commercial landscaping material by local commercial topsoil blenders that have contracted with Emerald Environmental to participate in this program. This request is to allow the Village of Sebring to incorporate their alum containing residuals into Emerald Environmental's soil blending and reuse process.

C.2 State what the maximum land application rate(s) are proposed to be and the total acres required and available for land application. Attach calculations and references showing how the application rates and acreage needs were determined.

Commercial topsoil with CAR utilize blends of up to 30% CAR.

C.3 Describe the monitoring of the material to be land applied and the soils in the land application area(s), including frequency, methods and parameters that will be measured in each:

The dewatered Water Treatment Residual (WTR) material currently stockpiled at the Site was sampled and analyzed in April 2012 for the following: aluminum; arsenic, barium, chromium, cadmium, copper, manganese, lead, selenium, zinc, percent solids and pH and TCLP metals. Agronomic analysis testing included the following: organic matter, available phosphorous, exchangeable potassium, manganese, calcium, soil pH, buffer pH, cation exchange capacity and percent base saturation of cation elements. Sixteen individual samples were collected by dividing the stockpile into grid sections and using a random number generator to select the 16 grids. The sixteen samples were combined to create one composite sample. The composite sample was then split with half going for analytical testing and half going for agronomic testing. In addition, the 16 individual samples were screened used an X-Ray Fluorescence (XRF) instrument for the metals listed above. This sampling and analysis process will be repeated for each 5,000 tons of WTR removed from the site.

C.4 Describe the appropriate weather conditions required for the land application of sludge/other byproducts and how they will be determined and documented:

N/A - material will be blended as weather conditions allow. Materials must be loose and dry for blending to be done efficiently.

C.5 Check which land application activities listed below are proposed. If yes, please explain how runoff, ponding or discharges to waters of the state will be prevented (attach separate pages as needed).

- | | |
|---|---|
| Do you propose to land apply during precipitation events?
If yes , please explain: | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Do you propose to spray irrigate when instantaneous wind speeds exceed 20 miles per hour?
If yes , please explain: Material will not be spray irrigated | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Do you propose to land apply within 10-year floodplain?
If yes , please explain: Not Applicable | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Do you propose to land apply in wetlands?
If yes , please explain: | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Do you propose to land apply where the land application contract is expired or void?
If yes , please explain: Not Applicable | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Do you propose to land apply when the ground is saturated at or near the surface?
If yes , please explain: | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Do you propose to land apply where there is at less than 12 inches between final grade and bedrock, sand or gravel lenses, compacted glacial till, and/or normal ground water elevation?
If yes , please explain: Not Applicable | <input type="checkbox"/> Yes <input type="checkbox"/> No |

C.6 List setback distances that will be observed for all of the following:					
Ditches/Streams/Waterways:	_____	feet	Private Water Supply Well:	_____	feet
Residences/Business:	_____	feet	Public Water Supply Well:	_____	feet
Sinkholes:	_____	feet	Public Surface Drinking Water Intake:	_____	feet
Pond or Lake:	_____	feet	Other:	Setbacks not applicable to blended soil application use.	

Attach additional pages if different setbacks are proposed for different methods of application (e.g. greater setbacks should be observed for surface application than injection).

C.7 Land application on frozen/snow-covered ground is not recommended. If land application on frozen/snow-covered ground is proposed, please indicate which of the following practices will be used to minimize pollutant discharges or nuisances:

- Application rate is limited to 10 wet tons/acre for solid materials (50% moisture or more) and 5 wet tons/acre for material less than 50% moisture. For liquids the application rate is limited to 5,000 gallons/acre.
- Applications will be made on land with at least 90% surface residue cover.
- Material shall not be land applied on more than 20 contiguous acres, separated by breaks of at least 200 feet.
- Application setbacks shall be increased to at least 200 feet from all grassed waterways, drainage ditches, streams, surface inlets, and water bodies.
- The rate of application will not exceed: _____ lbs Nitrogen/acre or _____ lbs Phosphorus/acre
- Application will not take place on slopes greater than 6% unless material is applied in alternating strips less than 200' wide generally on the contour, or in the case of contour strips, on alternating strips.

If any of these practices are not proposed to be followed, please attach a description of how pollutant discharges will be minimized during application on frozen/snow covered ground.

C.8 Describe or list any other practices that will be used to minimize pollutant discharges or nuisances:

There are no specific pollutant discharges or nuisances associated with the blended soil materials different than application of virgin topsoil.

C.9 Land Application Records

How will land application information be recorded? : Records are kept for shipments from dewatering/conditioning facility to soil blending facilities.

- Ohio EPA's Land Application Record Form Our Own Land Application Record Form (attached)

Where will the records be kept? : Emerald Environmental

C.10 Application Site Map (If known)

a. A map locating each land application site shall be attached. Each site shall be labeled "Restricted access site" or "Unrestricted access site". The map(s) should show the following items and are considered part of this plan:

- All present and known proposed occupied buildings within 300 feet of the land application area.
- All present and known proposed non occupied buildings within 300 feet of the land application area.
- All present and known proposed public and private water supply wells within 1,000 feet of the land application area.
- All sinkholes and waters of the state (including ditches, grass waterways, streams and rivers) within 200 feet of the land application area.
- All public surface drinking water supply intakes within 1500' of the land application area.
- All present and known proposed developments and public access areas within 300 feet of the land application area.

b. If the land application site(s) are not known, will site maps be submitted before land application starts? Yes No

D. Other Beneficial Uses

1. Is this material one of the following:
- Spent Foundry Sand
 - Bottom Ash From Coal Combustion
 - Fly Ash
 - Steel Slag
 - Sludge
 - Other:
2. If the material is "Other", have you contacted Ohio EPA to discuss the applicable regulations? Yes No
3. Is a comprehensive management plan attached for uses other than land application? Yes No

E. Miscellaneous Information:

The following items shall be included with this land application management plan:

- Two copies of the Permit-to-Install/Plan Approval Application Form A or the NPDES Permit Application.
- If applicable, two copies of the site and soil evaluation(s) (For renewal applications, this is only needed if additional or different areas)
- One copy of the sampling results for the material to be beneficially used (the most recent, but no older than one year).
- Four copies of this management plan and any attachments or Four copies of a separate/complete management plan.
- Fee check payable to "Treasurer, State of Ohio."

The following additional information is included with this form: None

F. The foregoing data is a true statement of facts pertaining to this proposed management plan.

Printed (Person Preparing Plan): *Scott Hershey*

Title: *Consultant for Village of Sebring*

Signed:

[Signature]

Date: *12/31/12*

APPROVED
OHIO ENVIRONMENTAL PROTECTION AGENCY
APR 19 2013
AS EVIDENCED BY COPY OF
LETTER OF APPROVAL
HERETO ATTACHED

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POLYMERIZATION OF STYRENE

BY
J. H. HARRIS
AND
R. W. LANTIER