



Ohio Department of Natural Resources

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October 24, 2014

Mr. Thomas Powell, P.E.
Hammontree & Associates, Ltd.
5233 Stoneham Road
North Canton, OH 44720

RE: Horizontal Recycling Station - Application to Operate a Facility
Harrison County

Dear Mr. Powell:

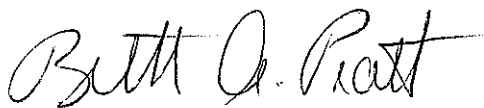
In August 2014, the Division requested clarification of the following italicized items. Additional information, submitted on October 6, 2014, by Hammontree & Associates, Ltd. was received and reviewed. The basis for review and approval of an application for an order is that the operations and safe guards implemented at the facility could reasonably be anticipated to prevent and/or minimize potential damage or injury to public health or safety, or damage or injury to the environment. Comments relative to the October submittal have been added below the italicized comments from the August 2014 review.

- *The layout of the site provided insufficient detail to define the boundary of the facility. Please provide views that clearly show the physical boundary of the facility.* An aerial map with an approximate boundary line was provided. Although this met the literal request, the line drawing does not show any other details of the site.
- *Provide cross-sections and/or other details pertaining to spill containment and the management of storm water on the site. Specifically, DOGRM is concerned with the potential of contaminated materials coming into contact with the soils or leaving the site in the event of a spill or as surface runoff that has come into contact with contaminated materials.* No cross-sections or specific details pertaining to spill containment or management of storm water were provided. Copies of manufacturer's websites do not constitute details for construction and no specific items proposed for installation were identified on the web pages. The text attachment contained the words "if required, the tanks will be lined" and "an example of". This type of statement does not provide any certainty of the product being specified or details for review. Please identify how spills will be contained. Mats may address small volume spills, but not potential catastrophic failure of a temporary bolt up tank that may be lined. It was hinted that the mats could be laid over a berm for truck access, but no details were provided indicating proposed construction of a berm. Provide cross-sections, volumes, and materials for construction of all proposed containment.

- *Provide design and construction details on the lined storage pit, including liner specifications.* No details on design or construction were provided for the 21,000,000 gallon pit. Has a geotechnical evaluations been performed to determine if the previously quarried area will be suitable for this installation? The pit is intended to store recycled water, but will all discharges into the pit be monitored and maintained at a quality that will not impact the environment if the liner would fail? In the proposed future rules, this pit will need a leak collection system and primary & secondary containment. A copy of a web page does not constitute a detail or specification.
- *Provide details on all of the tanks to be used at the treatment site, including the ozone tank, brine waste tanks, re-use water storage tanks, etc.* No details on specific treatment tanks were provided. No sizes were specified. It was stated that tanks would be similar to a kwik tank, and may be lined. This level of uncertainty cannot be evaluated. Again, a copy of a web page does not constitute a detail or specification.
- *Define how the solids generated from the treatment processes will be managed. These solids would be considered (Technically Enhanced Naturally Occurring Radioactive Material) TENORM and must be managed as per ORC Section 1509.074.* Much of the waste materials being accepted and the waste materials generated from the treatment process will be TENORM. At a minimum, the TENORM generated from the treatment processes would be anticipated to be elevated to a level that will require protection of the environment, workers and the public. Provide an appropriate management plan for the anticipated TENORM to be handled and stored, including but not limited to, protocols for protection of the public, monitoring, implementation, and material testing.
- *Provide the final disposition of the liquid and solid wastes generated at the facility.* No details were provided. Please note that any beneficial reuse of waste materials is not approved by ODNR but is under the authority of the Ohio EPA.

In summary, the submitted documents are insufficient to recommend the application for a Chief's Order to Operate a Facility. Based on the premise listed above for review of the application, precise responses to the items above and, if available, a set of construction drawings should contain the details necessary to evaluate the proposal. If you would like to discuss this further, please feel free to contact me.

Sincerely,



Beth A. Pratt, P.E.

Division of Oil & Gas Resource Management (DOGRM)

C: Blake Arthur, P.E., DOGRM