

OHIO ENVIRONMENTAL PROTECTION AGENCY

PERMIT-TO-INSTALL

Application Number:02-20386
Application Received: June 15, 2004
Permit Fee: \$25,499.75
Permit Fee Balance: \$25,099.75

Applicant: International Steel Group (ISG), Inc.
Address: 3060 Eggers Road
Cleveland, Ohio 44105

Facility: ISG Industrial Waste Landfill
Location: This facility is located at 3060 Eggers Road in the City of Cleveland, Cuyahoga County, Ohio.

Permit: Vertical and Lateral Expansion

Issuance Date:

Effective Date:

The above named entity is hereby issued a permit approval (permit-to-install) for the above-described source pursuant to Ohio Administrative Code (OAC) Rule 3745-27-02. Issuance of this permit approval does not constitute expressed or implied approval or agreement that, if constructed and/or modified in accordance with the plans, specifications, and/or information accompanying the permit application, the above-described source of environmental pollutants will operate in compliance with applicable state and federal laws, rules, and regulations, and does not constitute expressed or implied assurances that, if constructed and/or modified in accordance with those plans, specifications, and/or information accompanying the permit application, the above described source of environmental pollutants will be granted the necessary operating permits and/or licenses. This permit approval is issued subject to the attached conditions which are hereby incorporated and made a part hereof.

Ohio Environmental Protection Agency

Joseph P. Koncelik, Director

PERMIT SUMMARY

This is a DRAFT permit (PTI Application Number 02-20386) which, if approved, authorizes the expansion of the approved limits of waste placement at the existing ISG Industrial Waste Landfill (Facility). The Facility is located at 3060 Eggers Road, City of Cleveland, Cuyahoga County, Ohio. ISG is both the owner and operator of the Facility.

The Facility currently consists of one active unit, "Area C," which comprises approximately 38.6 acres of waste placement, and one closed, non-contiguous, 12.0-acre unit, "Area B." The PTI application proposes a 43-acre total expansion of "Area C." The lateral expansion consists of 25.0 acres, and the vertical expansion includes 18.0 acres over existing, unlined waste. The proposed expansion volume is approximately 2,549,975 cubic yards. Based on this volume and the daily waste acceptance, the proposed expansion will provide an additional 7.7 years to the anticipated life of the Facility.

The PTI application includes the following: a surface water management system, a leachate collection system with storage tanks, a composite liner system including a separatory liner, a groundwater monitoring system, a final closure cap system, and 30 years of post-closure care.

This summary is provided solely for informational purposes and does not constitute a part of, or otherwise affect, the attached permit-to-install.

PERMIT CONDITIONS

1. The director, or an authorized representative, may enter upon the premises of the above named applicant (permittee) at any reasonable time during construction and operation for the purpose of making inspections, conducting tests, or examining records or reports pertaining to the construction, modification, or installation of the above-described source of environmental pollutants (industrial solid waste disposal facility).
2. The proposed facility shall be constructed in strict accordance with the plans, specifications, and information submitted as a part of the application for this permit approval. There may be no deviation from the approved plans without the express, written approval of the Ohio Environmental Protection Agency (Ohio EPA). Any deviation from the approved plans or the permit conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facility will operate in compliance with all Ohio laws and regulations. Additional facilities and/or landfill components shall be installed upon orders of Ohio EPA if the proposed industrial solid waste disposal facility is inadequate or cannot meet applicable standards.

3. Issuance of this permit approval does not relieve the permittee of the duty to comply with all applicable federal, state, and local laws, ordinances, and regulations.
4. This permit approval shall apply only to those facilities shown on the plans submitted as part of PTI Application Number 02-20386, as received on June 15, 2004, with subsequent revisions received on January 27, 2005; January 28, 2005; April 12, 2005; May 27, 2005; June 24, 2005; July 21, 2005; and August 10, 2005.
5. This permit approval may be modified, or alternatively revoked and reissued, to comply with any revisions to OAC Chapter 3745-29 applicable to this industrial solid waste disposal facility.
6. The permittee shall provide for the proper maintenance and operation of the industrial solid waste disposal facility in accordance with the provisions of OAC Chapter 3745-29.
7. Nothing in this permit approval shall be construed to authorize any waiver from the requirements of any applicable federal or state laws or regulations. This permit approval shall not be interpreted to release the permittee from responsibility under Ohio Revised Code (ORC) Chapters 3704, 3714, 3734, or 6111; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants to the environment.
8. Not later than seven (7) days prior to starting any construction authorized under this permit approval, the permittee shall submit to Ohio EPA, Northeast District Office (NEDO) and the Cuyahoga County and City of Cleveland Health Departments written notification of the anticipated construction start date, so that construction of the Facility can be routinely inspected by Ohio EPA, NEDO and the Cuyahoga County and City of Cleveland Health Departments before being placed into operation.
9. This permit approval does not authorize the acceptance of any hazardous or infectious wastes.
10. This permit approval does not authorize the acceptance of any asbestos or asbestos-containing waste material that is subject to the provisions of NESHAP, 40 CFR Part 61, Subpart M. No such asbestos or asbestos-containing waste material may be accepted without first obtaining the necessary permits from Ohio EPA.

11. The permittee shall perform the following activities during construction and operation of the Facility in accordance with the cited provisions of OAC Chapter 3745-29 as follows:
 - a. The test pad required by OAC Rule 3745-29-08(E) shall be constructed, and a report containing the test results shall be submitted to Ohio EPA, NEDO not later than fourteen (14) days prior to the initial construction date of the landfill component that the test pad models.
 - b. The pre-construction tests required by OAC Rule 3745-29-08(D) shall be performed, and the test results shall be submitted to Ohio EPA, NEDO not later than seven (7) days prior to the intended use of the materials in construction.
 - c. The pre-construction interface tests required by OAC Rule 3745-29-08(G) shall be performed, and the test results shall be submitted to Ohio EPA, NEDO not later than seven (7) days prior to the use of each geosynthetic material authorized by this permit approval.
 - d. The construction certification report required by OAC Rule 3745-29-08(H) shall be submitted to Ohio EPA, NEDO not later than forty-five (45) days prior to the anticipated date of waste receipt in the newly constructed phases.
 - e. Pursuant to OAC Rule 3745-29-19(C)(1), the permittee shall not accept waste in a phase until Ohio EPA, NEDO, provides written concurrence of the construction certification report for that phase.
12. The permittee shall provide for the following inspections and facility maintenance of the Facility:
 - a. The permittee shall provide for daily inspection of the Facility and completion of the Industrial Solid Waste Landfill Daily Log of Operations, Form 3. Written results of the inspections, including any corrective measures employed, shall be made available to Ohio EPA, NEDO and the Cuyahoga County and City of Cleveland Health Departments, upon request.
 - b. The permittee shall inspect surface water control structures, including sedimentation ponds, sedimentation pond discharge structures, pipes, ditches, and culverts, at least monthly for erosion, clogging, or failure, and prompt corrective action shall be taken, if necessary. A log including inspection results, any corrective measures taken, and the date and weather conditions during any water quality sampling shall be maintained and submitted to Ohio EPA, NEDO or the Cuyahoga County and City of Cleveland Health Departments, upon request.

- c. To ensure proper operation of the sedimentation ponds, the permittee shall clean out the ponds completely every year or when the volume of settled particles necessitates cleaning based either on inspection results or to maintain the storage volume required by OAC Rule 3745-29-08(D)(3).
13. Prior to waste acceptance in any disposal area newly authorized by this permit approval, the permittee shall execute and fund a financial assurance instrument meeting the requirements of OAC Rules 3745-27-15, 3745-27-16, and 3745-27-17.
14. Pursuant to ORC Sections 3745.11(Q) and (V), payment of the solid waste permit-to-install fee balance, in the amount of \$25,099.75 payable to "Treasurer, State of Ohio," shall be submitted to Ohio EPA, Attn: Fiscal Administration, P.O. Box 1049, Columbus, Ohio, 43216-1049. The fee balance shall be submitted within thirty (30) days of the effective date of this permit approval. Failure to timely submit the required permit fee balance will result in assessment of late penalties in accordance with the aforementioned sections.

END OF CONDITIONS