



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korfeski, Director

Re: Notice of Violation  
Tri State Garden Supply Company  
Henry County

August 14, 2009

CERTIFIED MAIL

Mr. Brian Kammeyer  
Tri State Garden Supply Company  
P.O. Box 451  
Archbold, Ohio 43502

Mr. Timothy R. Kasmoch  
Tri State Garden Supply Company  
P.O. Box 451  
Archbold, Ohio 43502

Mr. David Kasmoch, Jr.  
Tri State Garden Supply Company, Inc.  
Gardenscape, Inc.  
P.O. Box 184  
Route 38 and Sandy Point Road  
Eau Claire, Pennsylvania 16030

Dear Mr. Kammeyer, Mr. Kasmoch, and Mr. Kasmoch:

On July 8, 2009, I, representing the Ohio Environmental Protection Agency (Ohio EPA) Division of Solid and Infectious Waste Management (DSIWM) conducted an inspection of the Tri State Garden Supply Company Class III composting facility (Facility) located in Ridgeville Township, Archbold, Ohio. This inspection was conducted to verify compliance with Ohio Administrative Code (OAC) Chapter 3745-27. Also present for the inspection was Sue Hardy of Ohio EPA. The Facility was represented during the inspection by Brian Kammeyer. The weather at the time of the inspection was sunny and warm with a light wind.

**Violations of the following rules and laws were observed:**

1. **OAC Rule 3745-27-45(A)(4)**, which states:  
(4) *The owner or operator shall not accept any prohibited material at the facility. Prohibited material includes the following:*

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch  
August 14, 2009  
Page Two

- (a) *Any feedstock, bulking agent, or additive other than those feedstock types, bulking agents, or additives authorized by rule 3745-27-40 of the Administrative Code. . .*
- (h) *Any other material that the facility is otherwise prohibited to accept under federal, state or local laws, regulations and ordinances.*

OAC Rule 3745-27-40(E)(1) states: *"(E) Class III composting facilities are: (1) Facilities where the owner or operator may accept only type A, type B, and type C feedstocks, bulking agents, and additives."* Type A feedstocks are source-separated yard wastes. Type B feedstocks are source-separated plant materials, including stems, leaves, vines, or roots, from an agricultural process. Type C feedstocks are source-separated animal wastes: animal excreta, bedding, wash waters, waste feed, and silage drainage.

OAC Rule 3745-27-01(B)(8) defines a bulking agent as: *". . . a material added to a composting system to provide structural support, improve aeration, or absorb moisture from the decomposing waste and includes only the following source-separated materials: wood chips, straw, shredded newspaper, shredded cardboard, sawdust, shredded brush, biodegradable containers, stover, and materials otherwise authorized in accordance with rule 3745-27-40 of the Administrative Code. Bulking agent does not include any wood that has been treated with preservatives containing arsenic or chromium."*

One pile containing mixed N-Viro soil, animal manure, and wood waste from Sauder Woodworking was located at the Facility: Pile G on the south side of Owl Creek. Please refer to Tracking Map 2 in Appendix B.

- A. The ground particle board from Sauder Woodworking in Archbold ("wood waste") that had been mixed with the N-Viro Soil and manure results from the sanding, sawing, drilling, and edge banding of fiber board and particle board furniture components and contains foreign material such as paper and plastic edge banding and paper laminate. This material is not a Type A, Type B, or Type C feedstock and does not meet the definition of bulking agent. The Sauder wood waste is therefore a prohibited material.
- B. The N-Viro International website states: *"N-Viro Soil produced according to the N-Viro Process specifications is an "exceptional quality" sludge product under the Part 503 Regulations."* [<http://www.nviro.com/soil.html>, June 4, 2008.] US EPA's "A Plain English Guide to the EPA Part 503 Biosolids Rule" states: *"Sewage sludge includes . . . any material derived*

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch  
August 14, 2009  
Page Three

*from sewage sludge (e.g., a blended sewage sludge/fertilizer product . . ."*  
[[http://www.epa.gov/owm/mtb/biosolids/503pe/503pe\\_1.pdf](http://www.epa.gov/owm/mtb/biosolids/503pe/503pe_1.pdf), page 4, June 4, 2008.] This material meets the definition of a Type I feedstock, which are ". . . *source-separated organic wastes, excluding wastes listed for any other feedstock type, that have resulted from industrial or commercial manufacturing processes or treatment works treating domestic sewage.*" Class III compost facilities shall not accept Type I feedstocks. N-Viro Soil is therefore a prohibited material. This use of N-Viro Soil is further discussed in Violation #3B.

Fly ash, as discussed in detail in a September 4, 2007 letter from Alison Shockley, also remains on site. Fly ash was observed in the north portion of the Facility, and appears to have been used to change the facility grade and construct roads and composting pads. During previous inspections, fly ash was also observed mixed into some of the compost piles and windrows on site.

C. Ohio EPA has reviewed all information provided regarding the fly ash and maintains that it is a residual solid waste pursuant to OAC Rule 3745-30-01(B)(1). Residual solid wastes are subject to the disposal requirements of OAC Rule 3745-27-05(A):

- (A) *Disposal of solid waste under Chapter 3734. of the Revised Code shall only be by the following methods or combination thereof:*
- (1) *Disposal at a sanitary landfill facility licensed in accordance with section 3734.05 of the Revised Code.*
  - (2) *Incinerating at an incinerator licensed in accordance with section 3734.05 of the Revised Code.*
  - (3) *Composting at a composting facility licensed or registered in accordance with section 3734.05 of the Revised Code.*
  - (4) *Alternative disposal methods either as engineered fill or land application, provided that the applicant has received prior authorization from the director that use as engineered fill or land application of the solid wastes will not create a nuisance or harm human health or the environment and is capable of complying with other applicable laws.*

The Tri State facility is not a sanitary landfill facility or an incinerator. The fly ash is not a Type A, Type B, or Type C feedstock and does not meet the definition of bulking agent. The owner/operator has not requested or received authorization from the director for an alternative disposal method.

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch  
August 14, 2009  
Page Four

Use, disposal, and composting of this fly ash at the Tri State Facility are therefore prohibited and the fly ash is a prohibited material. The fly ash must be removed from the Facility and properly disposed.

**The owner/operator is in violation of OAC Rule 3745-27-45(A)(4) for accepting prohibited materials. Each acceptance of prohibited material is a separate and distinct recurring violation of this rule.**

The owner/operator's management of the prohibited materials must comply with OAC Rule 3745-27-45(C)(2), which requires prohibited material to be removed from the materials placement area, logged in the daily log (Form 5), and properly disposed.

To comply with OAC Rule 3745-27-45(C)(2), all prohibited materials - the N-Viro Soil/manure/wood waste blend and the fly ash - must be removed from the Facility and taken to a facility that is allowed to accept them, i.e. in Ohio, a licensed solid waste landfill or a Class I or II composting facility that has obtained approval from the director to accept the specific material.

On August 10, 2009, Ohio EPA received an email from Mr. Kammeyer that stated removal of the fly ash had begun. The email stated the fly ash was being transported to Vienna Junction Landfill, a solid waste landfill in Erie, Michigan. Please notify Ohio EPA when removal of the fly ash is completed so that an inspection of the area can be conducted to confirm complete removal of the ash.

The owner/operator's management of the prohibited material is further discussed in Violation #3.

2. **OAC Rule 3745-27-41(B)**, which states:

(B) *No person shall substantially change a currently registered composting facility without first submitting the notification required by paragraph (D) or (E) of this rule . . . For the purposes of this rule, a substantial change includes, **but is not limited to**, the following: . . .*

(3) *A change in the type of feedstock, bulking agent, or additive received when the acceptance of the new feedstock type, bulking agent, or additive requires a change in the class of the facility. . . .*

and **OAC Rule 3745-27-45(A)(1)**, which states in pertinent part:

*General operational requirements. The owner or operator of a composting facility shall operate the facility in accordance with the following:*

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch Jr.  
August 14, 2009  
Page Five

(1) *The owner or operator of a composting facility shall operate the facility in compliance with the applicable authorizing document(s). Such authorizing documents may include . . . information submitted for the registration in accordance with rule 3745-27-41 of the Administrative Code.*

- A. The Facility's layout is substantially changed from that depicted in the site plan drawing submitted with the original February 17, 1993 registration application. Please see the November 2, 2007 letter regarding the October 4, 2007 inspection for specifics.

**The owner/operator is in violation of OAC Rule 3745-27-41(B) for substantially changing the layout of a currently registered Class III composting facility without first submitting the notification required by OAC Rule 3745-27-41(D) and of OAC Rule 3745-27-45(A)(1) for failing to operate the facility in compliance with information submitted for the registration.**

- B. As detailed in Violation #1, above, a pile containing mixed N-Viro Soil, animal manure, and wood waste from Sauder Woodworking was located at the Facility. N-Viro Soil is an "exceptional quality sludge" (EQS) and is a Type I feedstock. Sauder wood waste is not included in the definition of bulking agent. It is therefore an alternate bulking agent.

On February 17, 1993, the owner/operator requested registration as a Class III compost facility. Class III compost facilities shall not accept Type I feedstocks and may not request approval to accept alternate bulking agents. OAC Rule 3745-27-40(D)(1)(b) states that Class II composting facilities may accept Type I feedstocks and/or alternate bulking agents with the prior approval of the director of Ohio EPA. Therefore, the acceptance of N-Viro Soil and Sauder wood waste requires a change in the class of the facility.

**The owner/operator is in violation of OAC Rule 3745-27-41(B)(3) for changing the feedstocks accepted, and accepting an alternate bulking agent, resulting in a required change in the class of the Facility, without first submitting the required notification and obtaining the required approvals.**

- C. The size of the Facility is significantly greater than that depicted on the Drawing. OAC Rule 3745-27-40(E)(2) states:

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch Jr.  
August 14, 2009  
Page Six

- (E) *Class III composting facilities are: . . .*  
(2) *Facilities where the limits of materials placement is less than one hundred and thirty-five thousand square feet of total area.*

One hundred and thirty-five thousand square feet is approximately 3.1 acres. It is estimated that the Facility's current materials placement area covers nearly 15 acres. The Facility no longer meets the definition of a Class III composting facility.

**The owner/operator is in violation of OAC Rule 3745-27-41(B) for failing to submit the notification required by OAC Rule 3745-27-41(D) despite having increased the size of the Facility such that it no longer meets the definition of a Class III composting facility.**

On December 8, 2008, Ohio EPA acknowledged Tri State's registration of a Class II composting facility at U-856 State Route 66, Archbold, the location of the Class III composting facility. The director of Ohio EPA proposed denial of the Class II facility's operating license on December 8, 2008. An operating license must be issued by the licensing authority before a Class II facility may begin operations.

3. **OAC Rule 3745-27-45(C)(2), which states:**

- (2) *All reasonable measures shall be employed to prevent acceptance of prohibited material at the facility. If prohibited material is detected:*  
(a) *All reasonable measures shall be employed to control and remove the prohibited material from the materials placement area, including but not limited to, windrows, piles, or in-vessel composting systems.*  
(b) *All incidents concerning the prohibited material shall be noted in the daily log.*  
(c) *With any incoming feedstock, bulking agent, or additive, the owner or operator shall refuse acceptance of the prohibited material.*  
(d) *The owner or operator shall properly manage the prohibited material in accordance with all applicable laws and regulations.*

As discussed in detail in Violation #1, N-Viro Soil and Sauder wood waste are prohibited materials. The piles containing these materials should have been removed from the Facility and taken to a facility that can accept them, i.e. a licensed solid waste landfill or a Class I or II composting facility that has obtained approval from the director to accept the material.

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch Jr.  
August 14, 2009  
Page Seven

Instead, a portion of the materials containing N-Viro Soil and Sauder wood waste have been distributed for sale. Approximately 2500 cubic yards remain on site. This volume was calculated from measurement of Pile G.

The fly ash, also discussed in Violation #1, is also a prohibited material and should have been removed from the Facility and taken to a facility that can accept them, i.e. a licensed solid waste landfill or a Class I or II composting facility that has obtained approval from the director to accept the material. The material remains on site.

**The owner/operator is in violation of OAC Rule 3745-27-45(C)(2) for failing to:**

- **Control and remove the N-Viro Soil, Sauder wood waste, and fly ash from the facility;**
- **Note all incidents concerning N-Viro Soil, Sauder wood waste, and fly ash in the daily log;**
- **Refuse acceptance of N-Viro Soil, Sauder wood waste, and fly ash; and**
- **Properly manage the N-Viro Soil, Sauder wood waste, and fly ash in accordance with all applicable laws and regulations.**

Mr. Kammeyer stated that Pile G contains all remaining N-Viro Soil/Sauder wood waste blend currently located at the Facility. The daily log forms document removal of 2760 cubic yards from May 13 – June 19, 2008 of N-Viro Soil/Sauder wood waste/manure blend to a Gardenscape site in the state of Pennsylvania. As discussed in Violation #1, Mr. Kammeyer stated that removal of the fly ash to a solid waste landfill has begun.

4. **OAC Rule 3745-27-45(H)(3)(b)**, which states:

- (3) *The owner or operator of a class I, II, III or IV composting facility shall do the following: . . .*
  - (b) *Take action to minimize the production of leachate and control, or eliminate ponding of leachate and the conditions that contribute to the discharge of leachate from the facility.*

A large area of ponded leachate was observed on the north side of Owl Creek. See Tracking Map 1 in Appendix B and Photo A1 in Appendix A. No discharge to the creek was observed.

**The owner/operator is in violation of OAC Rule 3745-27-45(H)(3)(b) for failing to take action to eliminate the ponding of leachate at the Facility.**

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch Jr.  
August 14, 2009  
Page Eight

**The following items were also noted during the inspection:**

- The daily operations forms were reviewed during the inspection:
  - Form 2: Incoming Materials & Distribution.
    - The incoming materials log documented receipt of only animal waste (AW) from January 22 through July 6, 2009.
  - Form 3: Materials Management.
    - Logs were completed for January 5 through July 3, 2009.
    - Temperatures, turning, construction of new windrows, combination of windrows, and stage of piles/windrows had been recorded.
  - Form 4: Daily Inspection Checklist.
    - Checklists were completed for January 6 through July 6, 2009.
  - Mr. Kammeyer provided a copy of the completed daily log forms for 2008 at the time of the inspection.
  
- The tracking system required by OAC Rule 3745-27-45(K)(4) was reviewed: The owner/operator utilizes three tracking maps for the Facility: one for the north field (Tracking Map 1 in Appendix B), one for the south field (Tracking Map 2 in Appendix B), and one for the finished compost storage area. Mr. Kammeyer provided copies of the north and south field tracking maps. The maps were not dated, but Mr. Kammeyer stated they were about three weeks old. The tracking maps appeared to reflect the conditions of the site at the time of the inspection, with the exception of the removal of Windrows 11, 39, 42, and 43 to curing pile H, and combination of Windrows 6 and 7 into Windrow 7, both on the north side of the Facility.
  
- The contingency plan required by OAC Rule 3745-27-45(A)(6) was located in the daily log binder.
  
- The distances between the ends of windrow and the meander line of Owl Creek were measured for the windrows that appeared closest to the creek. All were found to be at least one hundred feet from the creek as required by OAC Rule 3745-27-45(M)(4).
  
- The north field was being re-graded at the time of the inspection. The regraded area was graded to slope to the south and was free from ponding. See photo A2 in Appendix A. Mr. Kammeyer stated he planned to instruct the equipment operators to make an effort to prevent rutting in the field to maintain the slope and prevent ponding. Mr. Kammeyer stated re-grading of the remainder of the north field should be completed before winter.

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch Jr.  
August 14, 2009  
Page Nine

### Additional Comments

A. On December 19, 2008, Ohio EPA received a letter from Jeff Andrey, Manager of Operations of Gardenscape, dated December 17, 2008, in response to Ohio EPA's November 17, 2008 letter concerning the October 16, 2008 inspection of the Facility. Thank you for your response to the November 17, 2008 inspection report. Ohio EPA would like to address some of the statements in Mr. Andrey's letter:

- In paragraph number 3, the letter discusses Tri States desire to distribute the material containing N-Viro Soil/Sauder wood waste. This issue has been discussed in several correspondences from Associate Assistant Attorney General John Cayton, most recently in a letter dated June 24, 2009. A copy is enclosed.
- The first full paragraph on page 2 of the letter states: "*Claims of 'vast majority' of this material [N-Viro Soil/Sauder wood waste blend] being distributed for sale are false. The claim of 'only about 15%' of the original material remaining on site is also false.*" Ohio EPA would like to be as accurate as possible in its letters to the Facility and so has clarified the volume of material removed to Pennsylvania (2760 cu yd according to the daily log of operations forms) and the estimated volume of material remaining on site (~2500 cu yd) in this letter. The June 15, 2007 letter from Ohio EPA that discussed the distribution of the N-Viro Soil/Sauder wood waste blend identified during the June 14, 2007 inspection stated in part:

*During the inspection, we observed the shredding of the N-Viro Soil/manure/Sauder wood waste mixture in the north portion of the facility, near the pile containing the N-Viro Soil/manure/Sauder wood waste mixture, identified as #33 on the tracking map in the daily log. In addition, a pile of material Mr. Kammeyer identified as containing the N-Viro Soil/manure/Sauder wood waste mixture was located in the mixing/bagging area near a screen. When questioned, Mr. Kammeyer stated that the material was being mixed into Gardenscape's topsoil product, bagged, and distributed. Near the end of the inspection, we observed an operator in a front end loader mixing materials into this pile. Mr. Kammeyer stated that the Facility has been mixing, bagging, and distributing the N-Viro Soil/manure/Sauder wood waste mixture for approximately thirty days.*

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch Jr.  
August 14, 2009  
Page Ten

*Mr. Kammeyer stated that the very large pile identified in previous inspections as the "50/50" pile, which consisted of half cow manure and half N-Viro Soil/manure/Sauder wood waste mixture, has already been distributed.*

Based on visual estimates from inspections conducted prior to its distribution, the "50/50" pile alone was at least three times as large in basal area and twice as tall as Pile G, the N-Viro Soil/Sauder wood waste blend currently remaining on site. See Photo A3 in Appendix A. Please respond to this letter with the volume of N-Viro Soil/Sauder wood waste material that was screened, blended, and bagged for distribution in 2007. If Tri State is unable to provide this volume, please provide a volume and count of the number of bags/pallets containing the N-Viro Soil/Sauder wood waste blend that were distributed and the estimated percentage of N-Viro Soil/Sauder wood waste blend in the bagged mixture. If N-Viro Soil/Sauder wood waste blend previously on site has left the Facility in a manner not described in this bulleted paragraph, please provide a volume and description of the disposition of that N-Viro Soil/Sauder wood waste blend as well.

- In paragraph number 4 on page 2, the letter states, "*The larger ponding as indicated on Photo A-1 is not located on the Class 3 [sic] compost facility. . . . 'NO discharge to the creek was noted' from these area. Therefore, one must conclude that the appropriate actions and management have been taken in this regard.*" A similar area of ponding was noted during the July 8, 2009 inspection and a violation of OAC Rule 3745-27-45(H)(3)(b) again cited. See Violation 4 above. Although the Facility boundary is not clearly delineated on the Drawing, the December 17, 2008 letter appears to assume the 100 foot setback from Owl Creek defines the south boundary of the Class III composting facility on the north side of Owl Creek. Defining the boundary as 100 feet from Owl Creek and stating that the large area of ponded leachate, being completely within the 100 foot setback, is not on the Facility, does not negate the violation. OAC Rule 3745-27-45(H)(3)(b) requires the owner/operator to, in part, eliminate ponding of leachate and the conditions that contribute to the discharge of leachate **from the facility**. Although no discharge to Owl Creek was observed during the October 16, 2008 or July 8, 2009 inspections, ponded leachate was still present. It was either within the Facility boundaries, a violation of OAC Rule 3745-27-45(H)(3)(b) for failing to eliminate ponding of leachate, or had discharged from the Facility onto the setback from Owl Creek, also a violation of OAC Rule 3745-27-45(H)(3)(b).

Mr. Brian Kammeyer  
Mr. Timothy Kasmoch  
Mr. David Kasmoch Jr.  
August 14, 2009  
Page Eleven

**Please provide the following:**

- Please contact Sue Hardy with Ohio EPA at (419) 373-3043 when the fly ash removal is completed so that a verification inspection can be conducted.

This correspondence addresses specific observations only for the areas of the Tri State Garden Supply Company composting facility that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no other violations existed at the facility at the time of inspection.

Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions contained in the Ohio Revised Code Chapter 3734. and the rules promulgated thereunder, does not relieve the owner/operator Tri State Garden Supply Company from their obligations to comply with other applicable state and federal laws and regulations.

If you have any questions, please have your attorney contact John Cayton of the Ohio Attorney Generals Office at (419) 245-2553 to coordinate our discussion.

Sincerely,



Kimberly K. Burnham, R.S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management  
/lb  
Attachments  
Enclosure

PC: Kimberly Burnham, Ohio EPA, DSIWM, NWDO  
Alison Shockley, Ohio EPA, DSIWM, CO (w/attachments, no enclosure)  
Carl Mussenden, Ohio EPA, DSIWM, CO (w/attachments, no enclosure)  
John Cayton, Assistant Attorney General (w/attachments, no enclosure)  
~~File: Henry County, Gardenscape, Inspections: (w/attachments, no enclosure)~~  
7007 2560 0000 4479 2216

EC: Dana Martin-Hayden, Ohio EPA, DSW, NWDO  
Jennifer Jolliff, Ohio EPA, DAPC, NWDO  
Mike Reiser, Ohio EPA, DSIWM, NWDO  
Sue Hardy, Ohio EPA, DSIWM, NWDO

OSTLWM-KB-LB

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> <li>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</li> <li>Print your name and address on the reverse so that we can return the card to you.</li> <li>Attach this card to the back of the mailpiece, or on the front if space permits.</li> </ul>	<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <input type="checkbox"/> Agent BRAIN KAMMEYER <input checked="" type="checkbox"/> Addressee</p> <p>C. Date of Delivery 8/21/09</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p>Mr Brain Kammejer Tri State Garden Supply PO Box 451 Archbold Oh 43502</p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7007 2560 0000 4479 2216</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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Sent To: Mr Brain Kammejer  
 Street, Apt. No., or PO Box No.: Tri State Garden Supply  
 PO Box 451  
 City, State, ZIP+4: Archbold Oh 43502

PS Form 3800, August 2006 See Reverse for Instructions

Appendix A

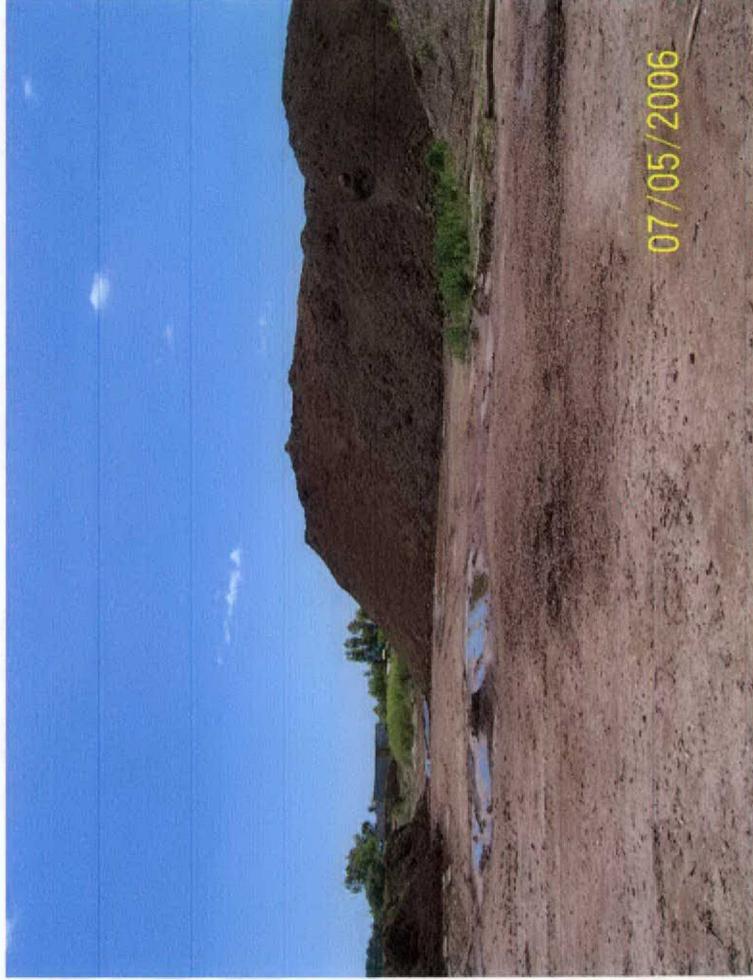


A1



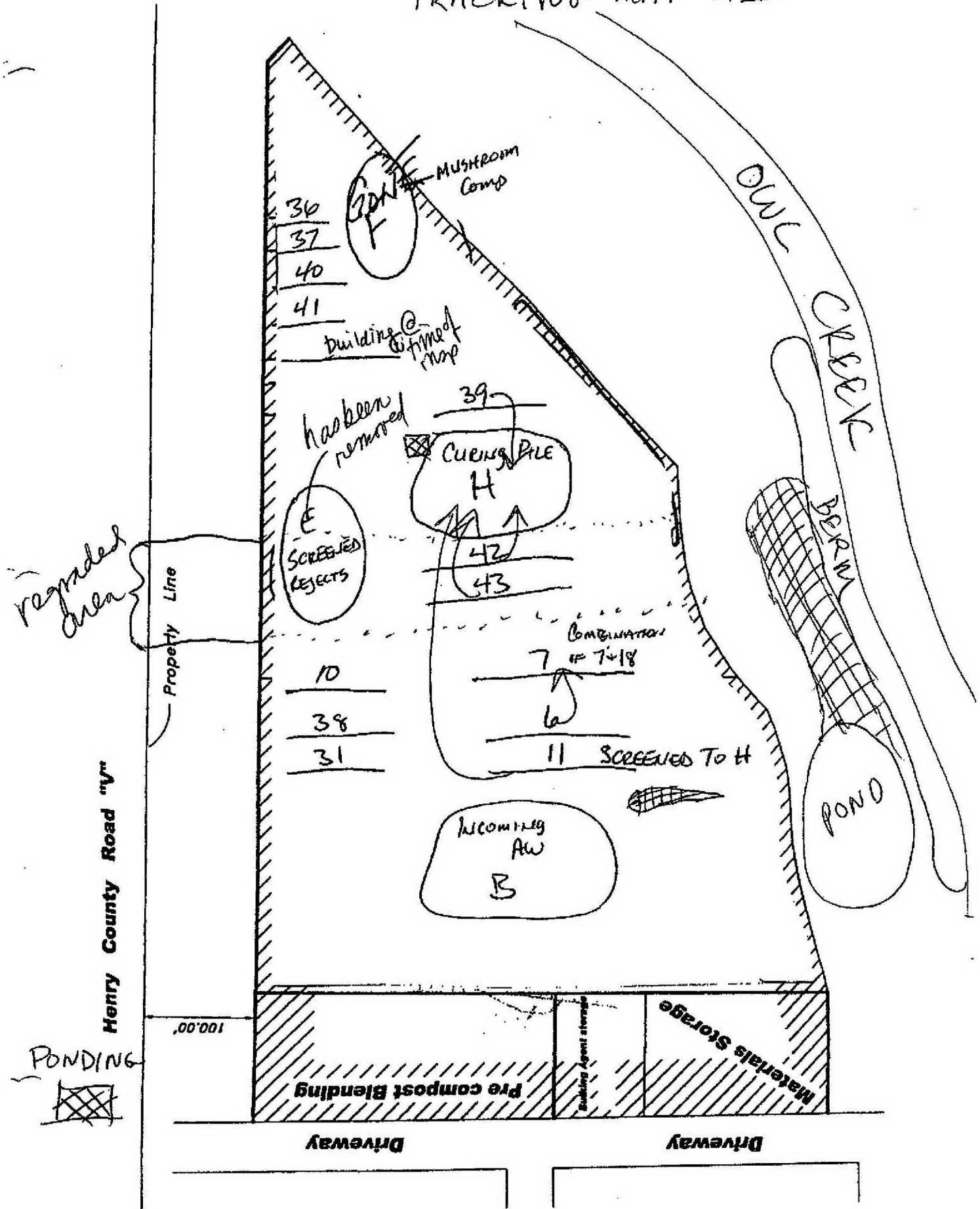
A2

Appendix A



A3

APPENDIX B  
TRACKING MAP #1



APPENDIX B  
TRACKING MAP #2

SOUTH FIELD

