



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
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 Korleski, Director

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

November 17, 2008

**CERTIFIED MAIL**

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

Dear Mr. Kasmoch:

On October 16, 2008, 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 cool with a light wind. Mr. Kammeyer stated that about 1.2 inches of rain had fallen in the previous 24-hour period.

**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:*
    - (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 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. 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 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.*

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

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

*(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. Thirty days after the receipt of a **completed** notification by Ohio EPA, the owner or operator may commence operations in accordance with the proposed change provided that applicable requirements of Chapter 3745-27 of the Administrative Code and Chapters 3704. and 6111. of the Revised Code have been met. A written explanation describing the nature of the substantial change shall be submitted with the notification. For the purposes of this rule, a substantial change includes, **but is not limited to**, the following:*

- (1) A change in the physical location of the entire facility.*
- (2) For a class II composting facility, a change in the total capacity or in the authorized maximum daily waste receipt established for the facility resulting in an increase of the facility's financial assurance cost estimate.*
- (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.*
- (4) A change in ownership 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:*

- (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:

(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.**

A registration notification for a Class II facility, an application for an operating license, and a request to accept alternate materials at the Archbold location were received by Ohio EPA on February 8, 2008, and are currently under review.

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.

Instead, the vast majority of the materials containing N-Viro Soil and Sauder wood waste have been distributed for sale. Only about 15% of the original amount of material remains on site.

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 46 loads of N-Viro Soil/Sauder wood waste/manure blend to a Gardenscape site in the state of Pennsylvania. Mr. Kammeyer also stated the owner/operator is investigating landfill disposal options for the fly ash.

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.*

Numerous areas of ponded leachate were observed throughout the Facility. 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.**

**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 February 1 through October 14, 2008.
    - Form 2 documents the removal of forty-six 60 cubic yard loads of N-Viro Soil/Sauder wood waste/manure blend to a Gardenscape facility in Pennsylvania.
  - Form 3: Materials Management.
    - Logs were completed for January 23 through October 2, 2008.
    - Temperatures, turning, construction of new windrows, combination of windrows, and stage of piles/windrows had been recorded.
    - Consolidation of all materials containing the N-Viro Soil/Sauder wood waste blend into Pile G on the south side of the creek was documented beginning on February 22, 2008.
    - The sampling of Piles A (formerly B) and G (the new N-Viro Soil/Sauder wood waste blend pile) on August 5, 2008, was documented.
  - Form 4: Daily Inspection Checklist.
    - Checklists were completed for through October 14, 2008.
- The tracking system required by OAC Rule 3745-27-45(K)(4) was reviewed: The owner/operator now 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 (Tracking Map 3 in Appendix B). Mr. Kammeyer provided copies of the site tracking maps, dated September 24, August 19, and July 23, 2008, respectively.

The tracking maps appeared to reflect the conditions of the site at the time of the inspection, with the exception of the addition of Windrows 40, 41, and 42 on the north side of the Facility. Mr. Kammeyer updated the north field tracking map to reflect these windrows before the end of the inspection.

- The contingency plan required by OAC Rule 3745-27-45(A)(6) was located in the daily log binder. A revised contingency plan was received from Jeff Andrey on August 4, 2008, in response to the inspection letter concerning the February 8, 2008, inspection. The revised plan addressed all of Ohio EPA's comments.
- 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 daily logs document sampling of Piles A (formerly B) and G (containing the N-Viro Soil/Sauder wood waste blend) on August 5, 2008.
  - Concerning sampling of Pile A:
    - Please forward the analytical results of the August 5, 2008, sampling event to Ohio EPA as soon as possible.
  - Concerning sampling of Pile G:
    - Pile G contains N-Viro Soil, Sauder wood waste, and manure. As detailed in Violation #1, above, N-Viro Soil and Sauder wood waste are prohibited materials and must be removed from the Facility and disposed. **These materials may not be distributed even if results of analytical testing of the materials appear to demonstrate compliance with the compost quality standards.**
- On October 27, 2008, Brian Kammeyer notified Ohio EPA via email that a sample had been collected from Pile A on October 22, 2008, and sent to A&L Laboratories for analysis. The results of this sampling event were received via email on November 14, 2008, and are under review.

#### Additional Comments

- A. Violation #9 in the July 10, 2008, letter regarding the February 2, 2008, inspection detailed the owner/operator's violation of OAC Rule 3745-27-45(J)(2) and (K)(3)(c) for failing to submit copies of the Facility's Daily Log of Operations forms for 2007. Copies of these completed logs were received on August 4, 2008. The owner/operator has adequately addressed this violation.
- B. Violation #2 in the July 10, 2008, letter regarding the February 2, 2008, inspection detailed the owner/operator's violation of OAC Rule 3745-27-45(E)(1) for utilizing a composting method that is not approved in rule, i.e. the large static pile or wedge method. During the October 16, 2008, inspection, it was observed that all large piles except Pile 22 had been moved into windrows.

Pile 22 was in the process of being moved into windrows. On October 22, 2008, Ohio EPA received a photo via email that showed former Pile 22 had been split into two windrows. See Photo A2 in Appendix A. The owner/operator has adequately addressed this violation.

**Please provide the following:**

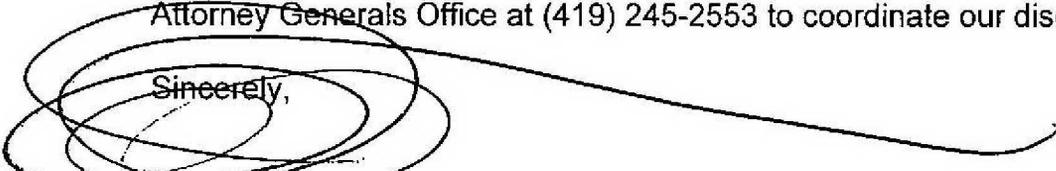
- Please submit copies of the test results from the sampling of Pile A on August 5, 2008.
- Respond in writing within 30 days of the receipt of this letter with a detailed description of how the owner/operator intends to resolve the violations detailed above. The owner/operator's response should include a detailed timeline for regaining compliance.

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 General's Office at (419) 245-2553 to coordinate our discussion.

Sincerely,

  
Kimberly K. Burnham  
Environmental Specialist  
Division of Solid and Infectious Waste Management

/llr

**Attachments**

pc: Kimberly Burnham, Ohio EPA, DSIWM, NWDO  
Alison Shockley, Ohio EPA, DSIWM, CO (w/attachments)  
Carl Mussenden, Ohio EPA, DSIWM, CO (w/attachments)  
John Cayton, Assistant Attorney General (& via fax 866-890-6654)  
(w/attachments)

ec: ~~DSIWM-NWDO File: Henry County, Gardenscape, Inspections (w/attachments)~~  
Dana Martin-Hayden, Ohio EPA, DSW, NWDO  
Jennifer Jolliff, Ohio EPA, DAPC, NWDO  
Mike Reiser, Ohio EPA, DSIWM, NWDO

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1. Article Addressed to:  
 MR. DAVID KASMOCH, JR.  
 THE STATE GARDEN SUPPLY CO., INC.  
 GARDEN SHAPE, INC.  
 P.O. Box 184  
 ROUTE 38 and SANDY POINT ROAD  
 EAU CLAIRE, PA 16030

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee  
 B. Received by (Printed Name) C. Date of Delivery  
 David Kasnoch 11-20-08  
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 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.  
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PS Form 3811, February 2004

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1. Article Addressed to:  
 MR. BUAN KAMMEYER  
 THE STATE GARDEN SUPPLY CO.  
 P.O. Box 451  
 ARCHBOLD, OH 43502

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee  
 B. Received by (Printed Name) C. Date of Delivery  
 Susan L. Page 11/21/08  
 D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
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 4. Restricted Delivery? (Extra Fee)  Yes

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1. Article Addressed to:  
 MR. TIMOTHY R KASMOCH  
 THE STATE GARDEN SUPPLY, INC.  
 P.O. Box 451  
 ARCHBOLD, OH 43502

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  Agent  
 Addressee  
 B. Received by (Printed Name) C. Date of Delivery  
 Susan L. Page 11/21/08  
 D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.  
 4. Restricted Delivery? (Extra Fee)  Yes

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Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.64



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 or PO Box No. P.O. Box 184 - Rt. 38 + SANDY Pk. Rd.  
 City, State, ZIP+4  
 EAU CLAIRE, PA 16030

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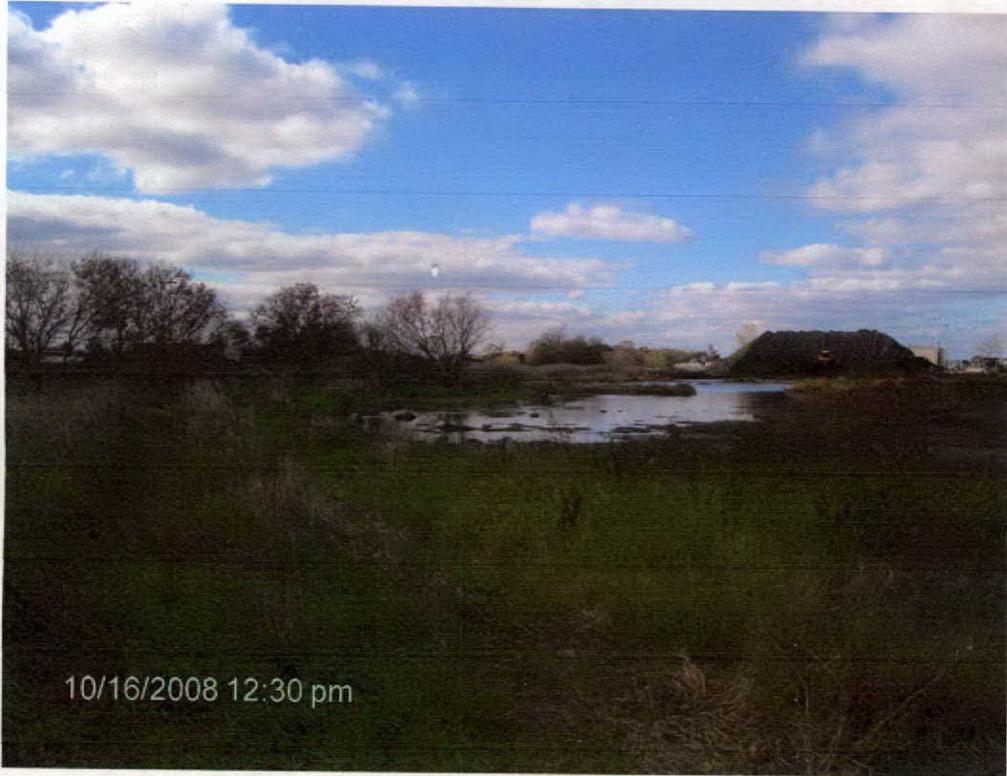
Postage	\$ 74
Certified Fee	2.70
Return Receipt Fee (Endorsement Required)	2.20
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 5.64



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Appendix A



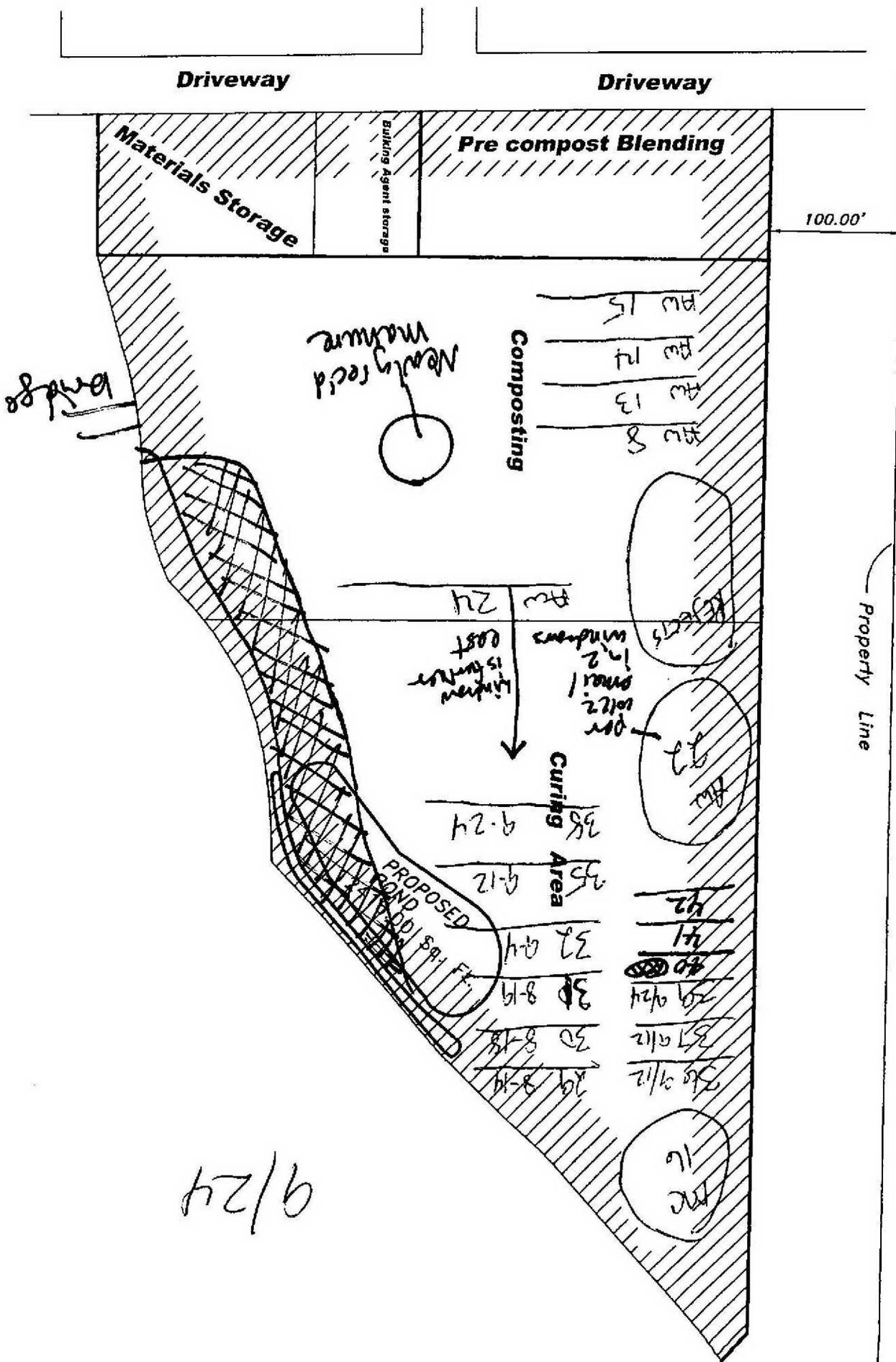
A1



A2

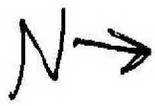
APPENDIX B  
TRACKING MAP #1

9/24



PONDING

Henry County Road "V"

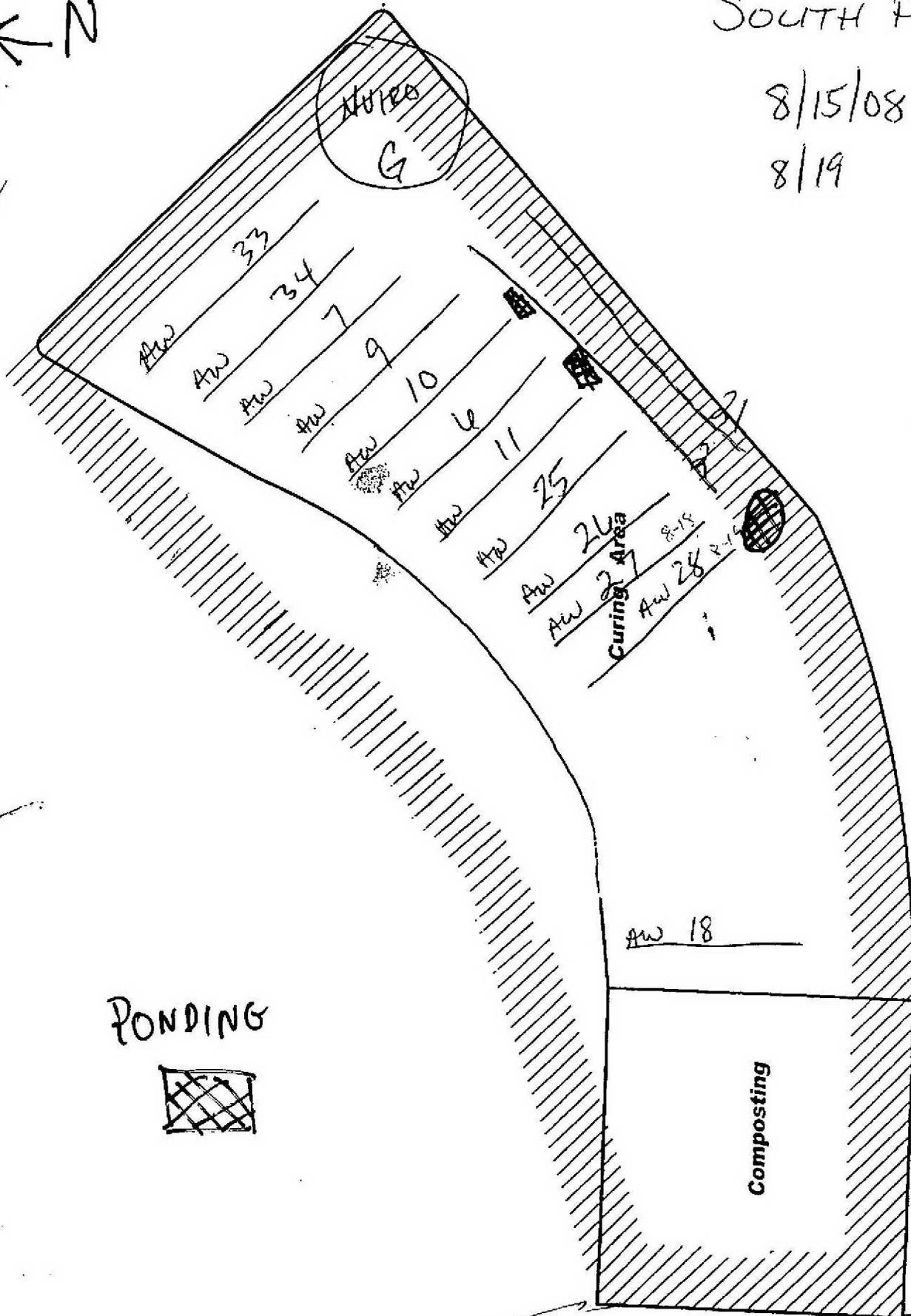


N

# APPENDIX B TRACKING MAP #2

SOUTH FIELD

8/15/08  
8/19



PONDING



Composting

Bridge

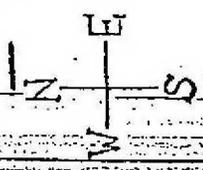
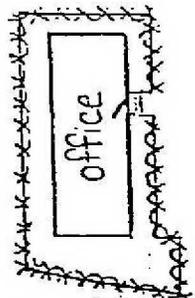
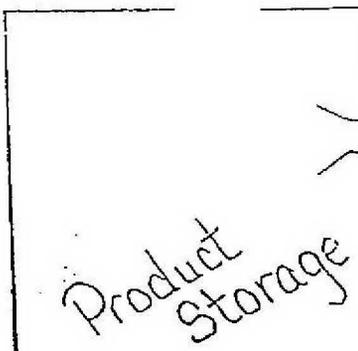
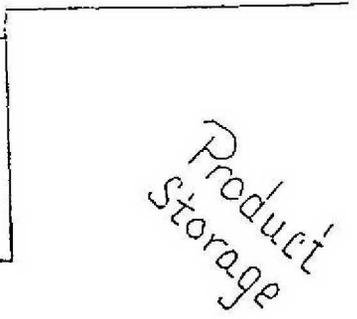
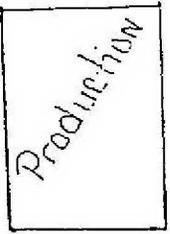
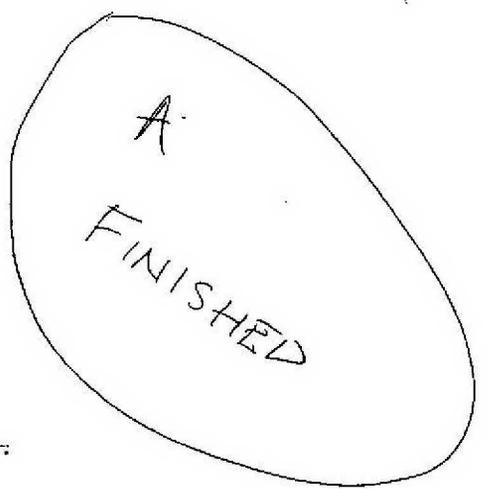
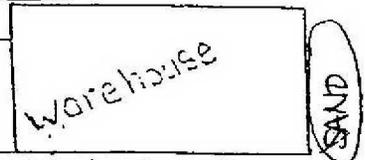
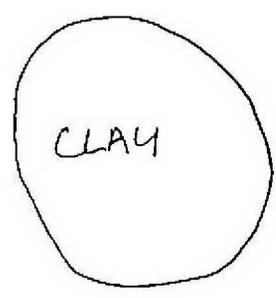
100.00 ft

# APPENDIX B TRACKING MAP #3

FINISHED COMPOST STORAGE

7-23-08

N



Route 66