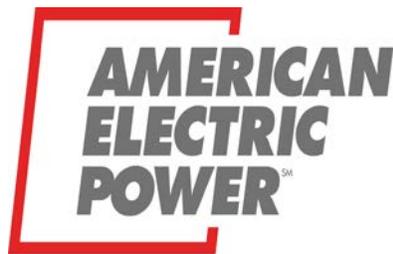


PUBLIC SERVICE COMPANY OF OKLAHOMA (PSO)

NORTHEASTERN POWER STATION



BOUNDLESS ENERGYSM

FUGITIVE DUST CONTROL PLAN

Prepared By:

**Public Service Company of Oklahoma
Northeastern Power Station**
7300 E Hwy 88
Oologah, OK 74053-0220

and

**American Electric Power Service Corporation
Environmental Services**
1201 Elm Street, Suite 4100
Dallas, Texas 75270

Revision 1 – October 2018

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Appendices

Appendix A – OAC 252:517 - Air Criteria (Oklahoma DEQ)

Appendix B – Figure 1 Northeastern Site Map

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**Appendix D – Landfill MOD Change of Waste ODEQ Final Waste type Tier II
and Response**

Appendix E – Plan Modification Documentation

Professional Engineer's Certification

By means of this certification, I certify that I have reviewed this CCR Fugitive Dust Control Plan and it meets the requirements of OAC 252:517-13-1.

DAVID ANTHONY MILLER

Printed Name of Registered Professional Engineer



David Anthony Miller

Signature

26057

OKLAHOMA

10.25.18

Registration No.

Registration State

Date

1.0 INTRODUCTION

This CCR Fugitive Dust Control Plan (Plan) has been prepared pursuant to the air criteria of OAC 252:517-13-1 (see Appendix A). The Plan has been prepared in accordance with the air criteria and following good engineering practices to include measures that will effectively minimize CCR from becoming airborne at the facility. The Plan and subsequent amendments will be placed in the operating record and retained in the office of the Plant Environmental Coordinator (PEC) for the American Electric Power (AEP) – Public Service Company of Oklahoma (PSO) Northeastern Power Station (Northeastern). The Plan and subsequent amendments will also be placed on Northeastern’s publicly accessible internet website titled “CCR Rule Compliance Data and Information.” The plan will be amended whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit. Where appropriate, the Plan incorporates fugitive dust control requirements as contained in the Oklahoma Department of Environmental Quality (ODEQ) air quality rules, and the Title V air permit issued for the plant.

There is one CCR surface impoundment and one CCR landfill (Landfill) located at the Northeastern Power Station that are subject to the Plan. The surface impoundment is the bottom ash pond (BAP) which contains sluice water for the removal of bottom ash. The Landfill receives fly ash, activated carbon injection (ACI), and dry sorbent injection (DSI) byproduct, bottom ash - which is periodically removed from the bottom ash pond - and other permitted inert and Non-Hazardous Industrial Wastes (NHIW) such as gravel, sand, and dirt as permitted (See Appendix D). The Plan addresses these CCR units and the associated paved and unpaved roadways.

2.0 FACILITY DESCRIPTION AND CONTACT INFORMATION

2.1 Facility Information

Facility Information

Name of Facility: Public Service Co. of Oklahoma, Northeastern Power Station

Street: 7300 E. HWY 88

City: Oologah State: OK ZIP Code: 74053

County: Rogers

Latitude: 36.43783° N Longitude: 95.70537° W

2.2 Contact Information

Facility Operator:

Name: Public Service Company of Oklahoma – Northeastern Power Station

Attention: P. M. Barton - Plant Manager

Address: P.O. Box 220, 7300 E. HWY 88

City, State, Zip Code: Oologah, OK 74053

Facility Owner:

Name: Public Service Company of Oklahoma

Attention: Bruce Moore – Manager, Air & Water Quality – West

Address: 1201 Elm Street, Suite 4100

City, State, Zip Code: Dallas, TX 75270

Plan Contact:

Name: Sam Miller – Northeastern Power Station Environmental Coordinator

Address: PO Box 220, 7300 E Hwy 88

City, State, Zip Code: Oologah, OK 74053

Telephone number: 918-581-0063

Email address: srmiller@aep.com

2.3 Activities at the Facility

The Northeastern Power Station is located on the west bank of the Verdigris River southeast of the intersection of US Highway 169 and Oklahoma Highway 88, just outside of Oologah, Oklahoma, and consists of four electric generating units. American Electric Power (AEP) - Public Service Company of Oklahoma (PSO) owns and operates Northeastern's nominally rated 490-megawatt Unit 3. The nominally rated 490-megawatt Unit 4 was retired in place by April 2016. Since then, Northeastern Power Station Unit 3 is capable of converting approximately 2 million tons of coal per year to electricity, powering thousands of homes, businesses, schools, and industrial facilities.

By April 2016, the existing electrostatic precipitator (ESP) transitioned from being the primary particulate matter control device, to becoming the product recovery device for ash collection. By April 2016, Northeastern Unit 3 has been equipped - downstream of the ESP - with Activated Carbon Injection (ACI) for mercury emissions control, Dry Sorbent Injection (DSI) for sulfur dioxide and

acid gas emissions control, and a Fabric Filter (FF) for particulate matter emissions control of ash, activated carbon, and dry sorbent. The ACI/DSI/FF has become the Unit 3 pollution control equipment. The Landfill is located on Plant property.

Bottom ash is produced by the two coal fired Northeastern Units and is wet sluiced to the removal area of the BAP during unit operations. In the removal area, the bottom ash drops out of the water stream before entering the body of the pond. The bottom ash is routinely reclaimed, loaded into trucks and transported to the Landfill for storage and use as a construction material, or sold for offsite beneficial reuse as a marketable material. Bottom ash that is not used for construction purposes or sold off site will be placed within the Landfill.

The fly ash handling system is an enclosed system. Fly ash removed via the electrostatic precipitators is collected in hoppers. Fly ash is pneumatically conveyed from the hoppers to a fly ash silo. At a later time, fly ash is loaded into trucks. Fly ash is then either sold and hauled off site by truck or railcar for beneficial reuse as a marketable material, or hauled by truck to the Landfill for disposal.

As an alternative, as of the summer of 2018, fly ash can bypass the fly ash silo, instead being collected in totes, then those totes are transported to the Landfill.

Since April 2016, ACI and DSI by-product have been mixed with fly ash at a 10%-15% mixture of ash to by-product, and the resulting mixture is transported via truck to the landfill for disposal.

2.4 Site Maps

A USGS site location map for the Plant showing the property boundaries, surrounding topography and receiving waters is included as Figure 1 in Appendix B. Appendix C contains a site location map for the Landfill and bottom ash pond (Figure 2).

3.0 FUGITIVE DUST CONTROL SELECTION

3.1 Paved and Unpaved Roadways

3.1.1 Overview

Trucks are used to transport fly ash, ACI and DSI byproduct mixtures from the storage silos and bottom ash from the bottom ash dewatering pile. As an alternative, as of the summer of 2018, fly ash can bypass the fly ash silo, instead being collected in totes, then those totes are transported to the Landfill. The CCR and ACI/DSI byproduct mixtures are hauled from the silos, pile, or in totes, to the Landfill by traveling approximately 0.5 miles over unpaved plant roadways to the Landfill entrance. CCR sold offsite for beneficial reuse is transported from the plant over paved roadways to a public roadway for approximately 0.5 miles. When reclaiming CCR from the Landfill to be sold offsite for beneficial reuse, trucks will travel the combined one-mile distance of 0.5 miles of unpaved plant roadways, and 0.5 miles over plant paved roadways, to the public roadway. Trucks may also travel approximately 0.25 miles of combined paved and unpaved roadways when transferring CCR from the fly ash silos to railcars for offsite beneficial reuse. Periodically, paved and unpaved roads traveled by trucks may be addressed to minimize fugitive dust due to plant activity.

Trucks are used to transport CCR and ACI/DSI byproduct mixtures from the plant site to the Landfill. Within the Landfill entrance, the trucks travel approximately 0.5 miles over Landfill paved roadways to the disposal area, followed by a much shorter unpaved roadway that varies with the location of the active fill area. Similarly, bottom ash trucks travel approximately 0.5 miles over unpaved plant roadways to the Landfill entrance. Periodically, paved and unpaved roads traveled by trucks may be addressed to minimize fugitive dust due to plant activity.

3.1.2 Paved and Unpaved Roadways

The primary appropriate and applicable fugitive dust control measures for roadways are watering, sweeping, tarping, and speed controls.

- a.** Water trucks are used as needed based upon the daily inspections and other observations to minimize or eliminate fugitive dust.
- b.** Chemical suppressants or stabilizers may also be used on unpaved roadways depending on specific site conditions.
- c.** Posted speed limits are 15 mph for paved and unpaved roads.

- d. Ash, Earth, or other materials that may be deposited onto paved roadways from trucks will be promptly removed to minimize fugitive emissions.
- e. Implementation of control measures will not be necessary for roadways that are covered with snow and/or ice or if sufficient precipitation occurs to minimize or eliminate fugitive dust.
- f. Implementation of any control measures may be suspended if unsafe or hazardous driving conditions would be created by its use.

3.2 Landfill

3.2.1 Overview

The landfill receives CCR, ACI/DSI by-product, as well as miscellaneous inert waste and NHIW (as permitted) from the Northeastern Power Station. All materials may contain moisture (conditioned) but water or chemical suppressants may be added at the landfill as necessary to minimize fugitive dust emissions. [**Note:** “conditioned” means the material has sufficient moisture content to prevent wind dispersal but will not result in free liquids.] The landfill activities are subject to ODEQ Solid Waste Permit No. FA3566010.

The Northeastern Power Station Title V Air Permit does not have a visible emission limit specific to landfills. However, the fugitive dust air quality rule [OAC 252: 100-29] - which is identical to Title V air permit condition [Specific Condition XIX A (4)] is applicable. It requires that:

“No visible fugitive dust emissions shall be discharged beyond the property line on which the emissions originate in such a manner as to damage or to interfere with the use of adjacent properties, or cause air quality standards to be exceeded, or interfere with the maintenance of air quality standards.”

3.2.1 Unloading and Placement

Fly ash and the ACI/DSI mixture are unloaded from trucks, or totes, in the active fill area of an open landfill cell by a bottom dump trailer with skirting and water sprays to minimize dusting. A bulldozer, or similar equipment, is used to spread and compact the materials, and a roller may also be used for additional compaction. Bottom ash is unloaded from end dump trucks into a storage pile for use in construction, to be sold for offsite beneficial reuse as a marketable material, or for disposal within the landfill. The fugitive dust control measures for truck unloading includes the proper skirting and water mist sprays of the

bottom dump trailers, maintaining moisture in the material, and taking other precautionary measures such as minimizing drop height. The measures for spreading and compacting include maintaining vehicle speed and watering materials.

3.2.3 Wind Erosion

Generally, landfill disposal areas can be classified as closed or open. Closed areas have received final cover and vegetation has been established. Open areas contain both the active fill area and areas that have been compacted but not yet received final cover. The open area fugitive dust control measures include: precautionary measures such as minimizing the amount of open area and pile height; compacting material as it is unloaded; watering; and application of chemical suppressants. The bottom ash storage pile fugitive dust emissions are minimized by watering, application of chemical suppressants and pile height control.

3.3 Bottom Ash Pond

Northeastern Power Station bottom ash is produced by Northeastern Unit 3, and is wet sluiced to the removal area of the BAP during unit operations. Ash is dredged from the pond and placed adjacent to the pond where it gradually dewater. The ash is then loaded onto trucks for transport. While the bottom ash typically remains wet, depending on the amount of moisture remaining in the ash and seasonal conditions, there may be fugitive emissions from the pile or truck loading activities. A review of potential control measures concluded that the applicable and appropriate options consist of: watering, chemical suppressant application, wind barriers, and minimizing drop height. Water or chemical dust suppressant may be applied to the pile to minimize fugitive emissions as needed. A berm is maintained around the pile to serve as a windbreak. The berm is constructed of bottom ash and or soil and typically covered with soil and vegetation. Water spray is applied as needed to the material handling activities and the drop from the loader into the trucks is minimized to further minimize fugitive emissions. Enclosures, compaction and daily cover are not applicable given the size of the area and characteristics of the material.

4.0 PLAN ASSESSMENT

The Plan will be periodically assessed to verify its effectiveness, and if necessary, amended in accordance with Section 7.0 below. The Landfill, BAP, and associated paved and unpaved roadways are routinely evaluated. The purpose of the inspections is to determine if the control measures for each CCR unit as described above are being implemented as necessary to minimize or eliminate fugitive emissions. Records of inspections and the control measures implemented as a

result of the inspections will be maintained. The PEC will review the inspection records annually to assess the effectiveness of the Plan and determine if additional or modified measures are warranted. No inspection is necessary if the surface is covered with snow and/or ice, or if precipitation has occurred that is sufficient to minimize or eliminate fugitive emissions. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

5.0 CITIZEN COMPLAINT LOG

5.1 Plant Contacts

Generally, complaints made to the plant are by telephone and routed to the PEC and/or the Plant Manager or his designee. In the case of a holiday, weekend day, or other times when the PEC may not be onsite or available, the plant control room may receive complaint information by telephone that is provided to the PEC at the earliest convenience. Complaints may also be made to the ODEQ, who in turn will contact either the PEC, or Northeastern Power Station management.

5.2 Follow-up

All complaints will be entered into a log by the PEC with details noted such as the nature of the complaint, date, time, and other relevant details. All complaints will be followed up which may include: checking plant operations at the time of the event, reviewing inspection records, discussing with other plant personnel, reviewing weather data, collecting samples and contacting the person making the complaint to obtain additional information.

5.3 Corrective Action and Documentation

Corrective actions will be taken as needed and documented. If it is determined that the Plan needs to be amended as a result of the corrective actions, it will be amended in accordance with the Plan. If necessary, the Plant Manager or his designee will follow-up with the complainant and/or ODEQ to explain the findings of the complaint investigation, corrective actions or sampling results. Citizen complaints will be recorded in the annual Report.

6.0 ANNUAL REPORT

The Annual CCR fugitive dust control report (Annual Report) will include the following components: description of actions taken to control CCR fugitive dust; a record of all citizen complaints; and a summary of any corrective measures taken. The initial Annual Report was completed within 14 months after the filing of the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing subsequent reports is one year after the date of completing the

previous report. The Annual Report will be deemed complete when the plan has been placed in the facility's operating record as described in Section 8.0.

7.0 PLAN AMENDMENTS

This Plan is a "living" document and will be amended, as necessary, whenever there is a change in conditions that would substantially affect the written plan in effect. The Plan will be amended in the case of construction and operation of a new CCR unit. Amendments made to the Plan will be documented in Appendix E. The amended Plan will be placed into the facility's operating record as described in Section 8.0.

8.0 RECORDKEEPING, NOTIFICATION and INTERNET REQUIREMENTS

8.1 Recordkeeping- OAC 252:517-19-1(g)(1-2)

ODEQ requires only the most recent Plan and files of all related information and any subsequent amendment of the plan, required by OAC 252:517-13-1(b) will be maintained in the facility's operating record at the facility. Files may be maintained on a computer or storage system accessible by a computer. One recordkeeping system may be used for the BAP and Landfill if the system identifies each file by the name of each unit (i.e. BAP or Landfill). The Plan (and any subsequent amendment of the plan) and the Annual Report will be kept in the facility's operating record as they become available.

8.2 Notification - OAC 252:517-19-2(a-c), (f)(1-2)

The ODEQ will be notified within 30 days of when the Plan (or any subsequent amended Plan) or the Annual Report is placed in the operating record and on the publicly available internet site. This notification will be made before the close of business on the day the notification is required to be completed. "Before the close of business day" means the notification must be postmarked or sent by e-mail. If the notification deadline falls on a weekend or federal holiday, the notification is automatically extended to the next business day.

8.3 Internet Site Requirements- OAC 252:517-19-3(a-d), (g)(1-2)

The most recent Plan and annual Report(s) will be placed on the facility's CCR website within 30 days of placing them in the operating record. The information required to be posted to the Web site will be made available to the public for at least 5 years following the date the information was first posted to the Web site. <https://www.aep.com/about/codeofconduct/CCRRule/Northeastern.aspx>

Appendix A

40 CFR Part 257.80 Operating Criteria

§ 257.80 Air criteria.

(a) The owner or operator of a CCR landfill, CCR surface impoundment, or any lateral expansion of a CCR unit must adopt measures that will effectively minimize CCR from becoming airborne at the facility, including CCR fugitive dust originating from CCR units, roads, and other CCR management and material handling activities.

(b) *CCR fugitive dust control plan.*

The owner or operator of the CCR unit must prepare and operate in accordance with a CCR fugitive dust control plan as specified in paragraphs (b)(1) through (7) of this section. This requirement applies in addition to, not in place of, any applicable standards under the Occupational Safety and Health Act.

(1) The CCR fugitive dust control plan must identify and describe the CCR fugitive dust control measures the owner or operator will use to minimize CCR from becoming airborne at the facility. The owner or operator must select, and include in the CCR fugitive dust control plan, the CCR fugitive dust control measures that are most appropriate for site conditions, along with an explanation of how the measures selected are applicable and appropriate for site conditions. Examples of control measures that may be appropriate include: Locating CCR inside an enclosure or partial enclosure; operating a water spray or fogging system; reducing fall distances at material drop points; using wind barriers, compaction, or vegetative covers; establishing and enforcing reduced vehicle speed limits; paving and sweeping roads; covering trucks transporting CCR; reducing or halting operations during high wind events; or applying a daily cover.

(2) If the owner or operator operates a CCR landfill or any lateral expansion of a CCR landfill, the CCR fugitive dust control plan must include procedures to emplace CCR as conditioned CCR. Conditioned CCR means wetting CCR with water to a moisture content that will prevent wind dispersal, but will not result in free liquids. In lieu of water, CCR conditioning may be accomplished with an appropriate chemical dust suppression agent.

(3) The CCR fugitive dust control plan must include procedures to log citizen complaints received by the owner or operator involving CCR fugitive dust events at the facility.

(4) The CCR fugitive dust control plan must include a description of the procedures the owner or operator will follow to periodically assess the effectiveness of the control plan.

(5) The owner or operator of a CCR unit must prepare an initial CCR fugitive dust control plan for the facility no later than October 19, 2015, or by initial receipt of CCR in any CCR unit at the facility if the owner or operator becomes subject to this subpart after October 19, 2015. The owner or operator has completed the initial CCR fugitive

dust control plan when the plan has been placed in the facility's operating record as required by § 257.105(g)(1).

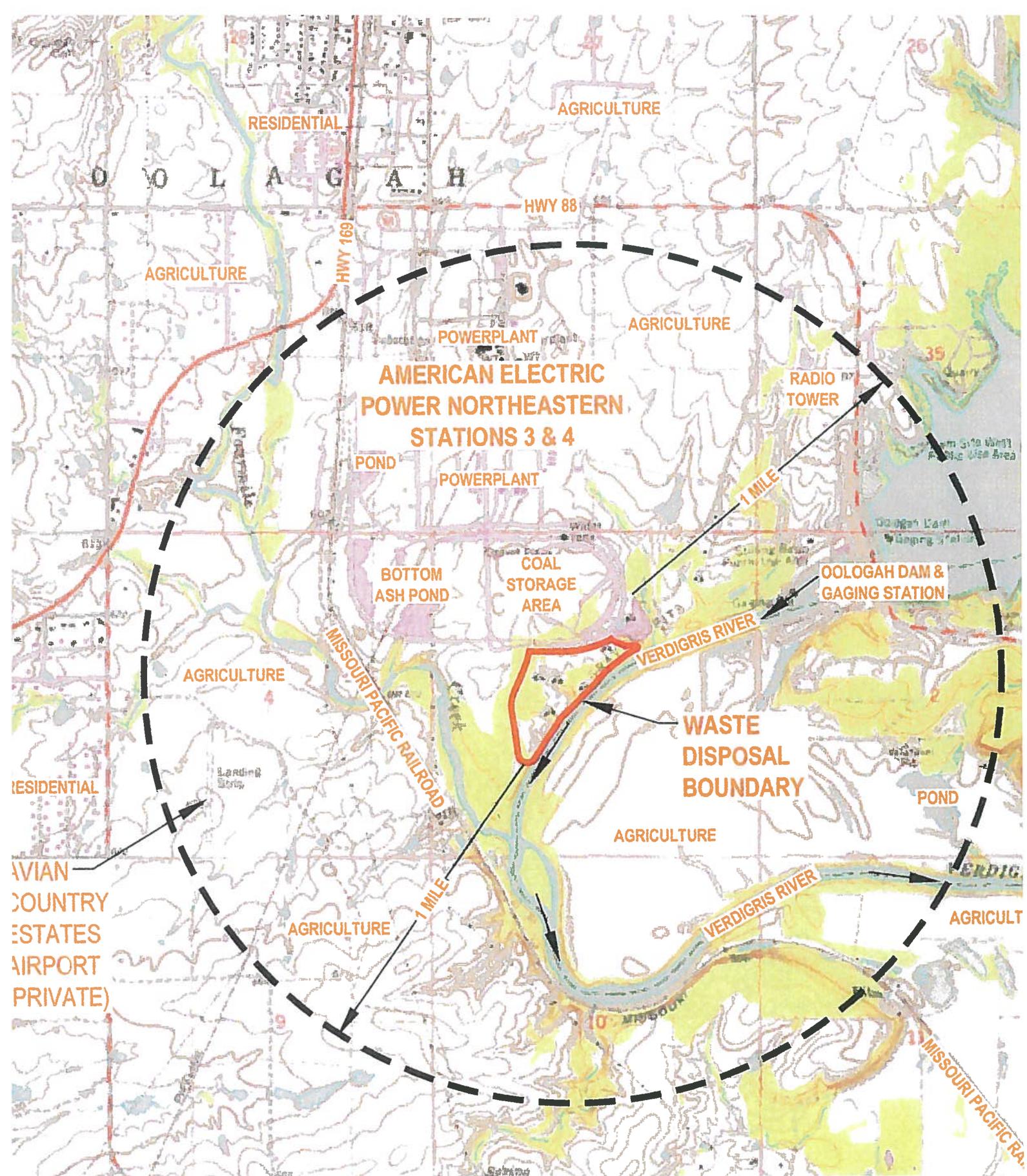
(6) *Amendment of the plan.* The owner or operator of a CCR unit subject to the requirements of this section may amend the written CCR fugitive dust control plan at any time provided the revised plan is placed in the facility's operating record as required by § 257.105(g)(1). The owner or operator must amend the written plan whenever there is a change in conditions that would substantially affect the written plan in effect, such as the construction and operation of a new CCR unit.

(7) The owner or operator must obtain a certification from a qualified professional engineer that the initial CCR fugitive dust control plan, or any subsequent amendment of it, meets the requirements of this section.

(c) *Annual CCR fugitive dust control report.* The owner or operator of a CCR unit must prepare an annual CCR fugitive dust control report that includes a description of the actions taken by the owner or operator to control CCR fugitive dust, a record of all citizen complaints, and a summary of any corrective measures taken. The initial annual report must be completed no later than 14 months after placing the initial CCR fugitive dust control plan in the facility's operating record. The deadline for completing a subsequent report is one year after the date of completing the previous report. For purposes of this paragraph (c), the owner or operator has completed the annual CCR fugitive dust control report when the plan has been placed in the facility's operating record as required by § 257.105(g)(2).

(d) The owner or operator of the CCR unit must comply with the recordkeeping requirements specified in § 257.105(g), the notification requirements specified in § 257.106(g), and the internet requirements specified in § 257.107(g).

Appendix B



NORTHEASTERN PLANT
 TOPOGRAPHIC SITE LOCATION MAP



Appendix C



NORTHEASTERN POWER STATION
LANDFILL AND BOTTOM ASH POND AERIAL VIEW

Appendix D



STEVEN A. THOMPSON
Executive Director

OKLAHOMA DEPARTMENT OF ENVIRONMENTAL QUALITY

MARY FALLIN
Governor

November 18, 2013

RECEIVED NOV 25 2013

Ms. Jill Parker-Witt, P.E.
American Electric Power
502 North Allen Avenue
Shreveport, LA 71101

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Re: Tier II Permit Modification—Change of Waste Type, Additional Non-hazardous Industrial Waste Streams Public Service Company of Oklahoma, Northeastern Power Station Ash Landfill Rogers County, Permit No. 3566010

Dear Ms. Parker-Witt:

In correspondence dated August 16, 2013, the Department of Environmental Quality (DEQ) issued a draft permit modification to dispose additional waste streams in the Northeast Power Station Ash Landfill. The modification request was processed as a Tier II permit modification. Public notice of the draft permit was published October 10, 2013 in the *Oologah Lake Leader*. No comments were received on the draft. In accordance with Oklahoma Administrative Code 252:4, Rules of Practice and Procedure, the permit is now issued as final.

Please read the attached permit conditions carefully. If you have any questions, please contact Patrick Riley at (405) 702-5191.

Sincerely,

A handwritten signature in black ink, appearing to read "Saba Tahmassebi", with a stylized flourish at the end.

Saba Tahmassebi, Ph.D., P.E.
Chief Engineer
Land Protection Division

ST/pcr



SOLID WASTE PERMIT MODIFICATION

The Department of Environmental Quality hereby approves the following modification:

Permit Number: 3566010
Permittee: American Electric Power
Facility: Northeastern Power Station Ash Landfill
Facility Type: Non-hazardous Industrial Waste Landfill
County: Rogers

Modification:

Revise the existing permit to allow disposal of additional waste streams in the generator owned and operated non-hazardous industrial waste (NHIW) landfill.

Conditions:

- 1) Only NHIW generated on-site at Northeast Power Station may be disposed in the Northeast Power Station Landfill (Landfill).
- 2) The following new waste streams, in addition to fly ash and bottom ash currently approved for disposal at the Landfill, may be disposed:
 - a. Economizer ash
 - b. Coal mill rejects and waste coal
 - c. Cooling tower sediment
 - d. Cooling water screenings
 - e. Sand filter media sediment
 - f. Demineralization resins
 - g. Storm water sump sediment
 - h. Fire brick and refractory materials
- 3) The following waste streams have been proposed for disposal but will not be generated until after Dry Sorbent Injection and Activated Carbon Injection processes are implemented at the site and after the interim liner and leachate collection system have been constructed.
 - a. Dry Sorbent Injection (DSI) flue gas treatment waste
 - b. Unusable DSI reagent
 - c. Pin mixer washout
 - d. Activated Carbon Injection (ACI) flue gas treatment waste
 - e. Waste activated carbon
 - f. Blasting media
 - g. Sediment from dredging storm water and leachate ponds

Since the above listed wastes have yet to be generated, full characterization has not been made, and a non-hazardous determination has not been documented. The waste streams may be disposed at the landfill after full characterization, including lab analysis, documents the waste streams to be non-hazardous and results have been

submitted to DEQ. The wastes are to be disposed on areas of the landfill equipped with synthetic liner and leachate collection system.

- 4) Documentation that all waste disposed in the landfill has been fully characterized and documented to be non-hazardous must be maintained as part of the facility record.
- 5) No office trash or putrescible waste may be disposed in the landfill.
- 6) No liquid waste may be disposed in the landfill.
- 7) Waste streams associated with the DSI process must be re-characterized if the reagent changes.
- 8) Northeast landfill must initially perform TCLP analysis on DIS and ACI flue gas treatment waste on a quarterly basis. If, after four quarters of sampling, non-hazardous results are consistently obtained, the landfill may request a reduced frequency of testing.
- 9) The balance of the waste streams must be re-characterized on an annual basis, or more frequently based on variability, volume, or generation rate, of the waste stream.

The permittee is authorized to operate in conformity with the application described above. Commencing operations under this permit modification constitutes acceptance of, and consent to, the conditions contained herein.



**Saba Tahmasebi, Chief Engineer
Land Protection Division**

Date: 11/18/13



**Scott Thompson, Director
Land Protection Division**

Date: 11-18-13

Appendix E

