

HarChem

H₂O

Water Services

PO Box 310, Muldrow, OK 74948

Attn: Wanda Armer
Green to Gold Recycling LLC
43470 Moccasin Trail Rd.
Meeker, OK 74855

RE: Environmental Site Assessment Report
43470 Moccasin Trail Rd.
Meeker, OK 74855

10/11/2024

Dear Mr. Shawn Cowen

HarChem Water Services has performed a Site Modification Assessment (SMA) of the subject site referenced above.

We appreciate the opportunity to provide assistance to you, and we hope to be able to assist you with your future environmental needs.

Sincerely,

HarChem Water Service

DISTRIBUTION OF REPORT

Distributed Copies of the Report

Green to Gold Recycling LLC
43470 Moccasin Trail Rd.
Meeker, OK 74855

HarChem Water Services
1955 S. Caddo
Muldrow, Ok 74948

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Legal Descriptions

“The East half of east half of the Southern Quarter of the Southwest Quarter (E/2 E/2 SE/4) in Section Nine (9) Township Eleven (11) North, Range Four (4) East of the Indian Meridian Pottawatomie County, Oklahoma

1.0 Introduction

This report is an instrument of service of HarChem Water Services. The report presents the results of a Tier Modification Environmental Site Assessment (ESA) of the 10 acres of Land Tract to be known as The East half of east half of the Southern Quarter of the Southwest Quarter (E/2 E/2 SE/4) in Section Nine (9) Township Eleven (11) North, Range Four (4) East of the Meridian” defined by the File No. 710101904459..

A Tier modification check list is conducted to permit formulation of an opinion as to the potential for hazardous materials to exist at a site at levels likely to warrant mitigation pursuant to regulations of the Oklahoma Department of Environmental Quality (ODEQ). Opinions relative to the hazardous materials potential given in this report are based upon information derived from the information provided by Oklahoma Green to Gold Recycling.

Oklahoma Green to Gold Recycling, LLC is applying for a modification to its existing Class II permit to accept food waste and medical marijuana waste greater than one hundred tons per year. According to OAC 252:515-43-4(c), Oklahoma Green to Gold will change from a Class II to a Class III facility. Oklahoma Green to Gold will receive all the following, but not limited to glass, plastics, medical marijuana waste, newspaper, and produce.

1.1 Activities to be regulated if application is approved

An application has been filed with the Department of Environmental Quality (DEQ) to upgrade Green to Gold Recycling from a Tier I facility to a Tier III facility.

- This applicant is seeking to modify their existing permit.
- Due to increases in capacity demand Oklahoma Green to Gold Recycling is requesting an increase to greater than 100 tons/year of solid waste.
- Green to Gold Recycling is also looking to expand the existing facility to make room for additional compost machines.
- These changes to this facility will help Oklahoma Green to Gold Recycling keep up with the solid waste input demands.

1.2 Public Participation

On request, a representative of DEQ will chair a meeting to explain the steps of DEQ's permitting process to interested persons. If a meeting is requested, there will be discussion explaining when oral and written public comments can be made on the proposal. Administrative hearing opportunities will also be discussed. To request a process meeting, send a written request to the DEQ representative named below within 30 days after the date this notice is published. Please note this is not a meeting for protests. Its purpose is to advise interested persons of participation opportunities during the permitting process. For more information about this process meeting, please contact the DEQ representative named below:

Applicant: Darrel Armer
Phone #: (479)651-0950

DEQ Representative: Lyndsey Murray
DEQ Land Protection Division P.O. Box 1677 Oklahoma City, OK 73101-1611
Phone #: (405)702-5134
Fax #: (405)702-5101

Meeting Location:
Meeker Public Library
616 Carl Hubbell Blvd. Meeker, OK 74855

2.0 Site Description

Property includes a metal building with a gravel and concrete driveway. This facility's driveway is equipped with gravel, concrete, or asphalt, therefore there is no concern about inclement weather impacting the daily functions of this business.

2.1 Location and Legal Description

The subject property is located outside Meeker city limits, Pottawatomie County, Oklahoma. Figure 1 and 2, included in Appendix A, which show the site location as seen by aerial image.

The legal description for the subject property is as follows:

A part of the of Section 9-T11N-R4E, Of Pottawatomie County

The East half of the East Half of the Southern Quarter (E/2 E/2 SE/4) in Section Nine (9)

2.2 Verification/Certification

Legal rights to the property are all included in the existing permit application. See Exhibit #8

2.3 Current Use of the Property

Metal building structure used to process medical marijuana waste.

2.4 Current Uses of the Adjoining Properties

To the North: Residential area

To the East: Residential area

To the South: Highway

To the West: Wooded Area

3.0 General Information

Oklahoma Green to Gold Recycling, LLC is applying for modifications to its existing Class II permit to accept food waste and medical marijuana waste greater than 100 tons per year. According to OAC 252:515-43-4(c), Oklahoma Green to Gold will change from a Class II to a Class III facility. Oklahoma Green to Gold will receive all the following, but not limited to glass, plastics, medical marijuana waste, newspaper, and produce.

Incoming Waste Process SOP: As waste comes into the waste facility the transporter is responsible for processing the waste. **See exhibit 4.**

- Remove waste products from the transporter vehicle using the designated overhead door.
- Log all weights and ID information into the electronic system and receive it in the Metrc software.
- Make sure all waste containers are leak proof and stage in designated area for either: to feed the worms, staging and prepping for compost production, or incinerating.
 - Medical marijuana waste (MMW) that meets the requirements to be fed to worms will be stored under the worm vats, tag and inventory for worm food.
 - All MMW that is not applicable to for feeding worms will be staged in areas designated to be composted or incinerated.
 - All scrap foods will be stored or frozen to feed worms only.
 - Waste that will be put back into inventory for a later process date will be stored in the staging area. Waste will then be tagged and inventoried for composting.
 - All MMW must be processed and disposed of within 6 months.
- Put all required OMMA information onto the containers so the MMW can be tracked until it is fully processed/disposed of. Take all transport manifests to the front office and place them on the desk to be scanned in the electronically filed.
- Once scanned in and electronically filed, place all paperwork in the cabinet labeled “Manifests” in date order. All records must be kept in order and in the designated area for any compliance inspections.
- Remove and sweep (if necessary) all THC containing waste and trash from the transport vehicle after each run.

Legal description by metes and bounds of proposed permit boundary and waste disposal areas. To include latitude, and longitude of all corners of the proposed permit boundary and process area.

- See exhibit #3

3.1 Estimated Intake

The anticipated waste volume is greater than 100 tons/year. Estimated volume is no more than 15,000 pounds/day. The feedstock will include, but not limited to, any cannabis trimmings, biomass, food waste, and may include cannabis crop residuals such as stalks, stems and leaves.

- Oklahoma Green to Gold Recycling will cover all 77 counties in Oklahoma.
- Oklahoma Green to Gold Recycling will serve approximately 3.5 million people.
- The roads to our facility are gravel, concrete, or asphalt, therefore there is no concern about inclement weather impacting entry.
- Anticipated heavy equipment includes but is not limited to forklift, skid steer, grinder, shredder, tractor, chipper and compost machines.

See exhibits #3, 4, 10, and 11.

Financial assurance was received by DEQ on 4/30/24. ***See exhibit #12***

3.2 Map and Drawings

- The maps and designs identified in this part shall be submitted with permit applications in the sequence identified for all new composting facilities. The permit application will be considered administratively incomplete if any maps or drawings submitted are not legible. All maps prepared as part of a permit application at a scale of one inch equals one hundred (1" = 100'). An alternative scale may be used with the approval of DEQ.

See Exhibits #1-4

- Map details. All maps shall show as a minimum, legend, title, north arrow, permit boundary, buffer zone, and boundaries of processing areas. If applicable, the locations of groundwater monitoring wells shall be identified.

See exhibit #1-8

- General location map. The permit application shall include a county highway map published by the Oklahoma Department of Transportation showing the facility location and any airports within six miles of the facility.

See exhibit #7

- Flood Plain Map: A flood plain map from a source approved by DEQ (e.g. FEMA Flood insurance rate map) depicting the limits and elevations of any 100-year flood plain on or within one mile of the permit boundary.

See exhibit #14

- Quadrangle topographic map: The permit application shall include an original U.S. Geological Survey 7.5 minute series topographic map shall clearly depict the location of the facility permit boundaries and any of the following within one mile of the facility: access routes, homes and building, public water and wastewater collection, treatment, receiving waters and surface variations, and water wells, including private and municipal potable and irrigation water within one mile of the facility.

See Exhibit #17

- Existing contour map: The permit application shall include a constructed map showing the topographic contours prior to any operations at the facility. The contours prior to any operations at the facility. The contour interval map shall not be greater than two feet. The

existing contour map shall show the locations and quantities of the surface drainage entering the facility

See Exhibit # 18

- (a) Required map: The permit application shall include a site map which may be the existing contour map. (b) Requires details: The site map shall show the following, as applicable to the facility: (1) The dimensions of the permit boundary as indicated by the legal description; (2) the receiving, processing, processing, storage, and disposal areas; (3) buffer zone; (4) the surface drainage, including location of diversion ditches, dikes, dams, pits ponds, lagoons, berms, terraces, and other relevant information; (5) the location of fencing and gates, utilities lines, pipelines and easements; (6) the access roads into and the site; (7) employee and equipment shelters; and, if applicable, (8) the locations and surface elevations of each borehole, monitoring site, test pit, sampling site and permanent benchmark.

See Exhibit #2, #3, #4, and #6.

- Design drawing: The permit application shall include, as necessary, design drawings and specifications for receiving, processing, storage, and disposal areas and any other design drawings or specifications necessary to describe the proposed activated and meet the design criteria of 515-43-71, 72, and 73.

See Exhibit #4

3.3 Location Standards

- Scenic Rivers: not to be located within the drainage basin of any river designated under Oklahoma Scenic Rivers Commission (OSRC) Act unless statement of no adverse effect is obtained from OSRC or Oklahoma Tourism & Recreation Department and submitted to DEQ.
- Recreations/Preservation Areas: Facility shall not be located within one-half (1/2) mile of area dedicated & managed for public recreation or natural preservation by any government agency. Exceptions granted if application includes statement from appropriate agency that proposed site is not expected to adversely affect recreation or natural area.
 - I state that no area within the permit boundary or located within ½ miles of any area formally dedicated and managed for public recreation or natural preservation by federal, state, or local government agencies.
- Endangered & Threatened Species: Statement required from Oklahoma Department of Wildlife (ODWC) and Oklahoma Biological Survey (OBS) concerning endangered or threatened wildlife or plant species within one (1) mile of proposed site. If existed, impact statement required, and mitigation plan approved by ODWC or OBS to be submitted to DEQ.

See exhibit # 15

- **100 Year Flood Plain and map:** No waste management or disposal areas shall be located within the 100-year flood plain. 100-year flood level & boundaries to be furnished in application. DEQ may grant a variance provided subsequent redefinition of the flood plain does not include the waste management or disposal areas.

See exhibit #14

- **Wetlands:** Facility shall not be located in wetlands. Letter required from Oklahoma Conservation Commission (OCC) stating proposed site not located in wetlands. Exception upon demonstration

that all the following can be made verified: Rebuttable presumption, no harm, no degradation, no net loss and sufficient information available.

See exhibit #19

3.4 Operational Standards

Oklahoma Green to Gold Recycling will be accepting feedstock types 1 and 2 and weigh upon pickup/drop off, documented on our manifest, and documented in the operating record at the time of billing in accordance with 252:515-43-52. The operating record will reflect the date, customer name, amount of waste, and type of feedstock.

- In accordance with 252:515-43-52 & materials stated in 252:515-19-31(a), (b), and (c), we will not accept any prohibited materials.
- Solid waste will not come into contact with any waters of the state located outside of the permit boundary. All waste is maintained, processed and composted inside of a warehouse.
- Facilities may accept Class A biosolids if authorized by their permit.
 - N/A as we will not be accepting any biosolids.
- Facilities that intend to compost Class B biosolids shall comply with all applicable state and federal regulations regarding sludge management at OAC 252:606-8 and shall have all necessary permits and approvals from the Water Quality Division.
 - N/A as we do not intend to compost Class B biosolids.
- Bulking: Feedstock with free liquid shall be mixed with drier feedstocks, bulking material or compost so that the liquid is promptly absorbed and not allowed to flow as free liquid from the compost piles or windrows.
 - During our sorting process. We will identify all “wet” material. All “wet” material will be mixed with dry material to absorb any liquid on the “wet” material. This is in accordance with 252:515-43-56.

• Operations plan: All applications for composting facility shall include an operations plan that describes how compliance with operating criteria will be met. The Operations Plan shall include measures to control nuisance odors, vectors, fires, contact water and stormwater.

See exhibit #10

- Access Control: Artificial and/ or natural barriers shall be used to discourage unauthorized traffic and uncontrolled dumping.
 - **See Exhibit #10**
- Signage: the facility shall maintain a sign at the entrance of the facility that lists the name of the facility, permit number, facility class, hours of operation, and emergency contact information.
 - **See Exhibit #10**
- Buffer Zones: All composting facilities shall be designed and maintained with a waste free buffer zone at least 50 feet in width to be contained with the permit boundary described in the permit application.
 - **See Exhibit #2**
- Receiving Area: Unloading of material shall be restricted to a specific area and controlled to minimize traffic congestion, facilitate the handling of materials, and minimize the danger to personnel.
 - **See Exhibit #4**
- A designated processing area shall be maintained. Contact water shall be directed to containment and processing system.
 - **See Exhibit #10**

- Storage of finished compost on site is limited to 12 months of production unless otherwise approved by DEQ.
 - **See Exhibit #10**
- The composting area shall be maintained and repaired as needed. An area for curing of finished compost shall cure for a minimum of two weeks before water shall submit a plan for DEQ approval. Composting operations must take place on an all-weather pad.
 - **See Exhibit #10**
- Processing time: Facilities must manage feedstock in a time frame that minimizes odor, release of feedstock liquids, fire and scavenging by vectors. All putrescible feedstocks must be processed within 48 hours of receipt. By the end of each operation day the feedstock must be processed or covered.
 - In accordance with 252:515-43-59, Oklahoma Green to Gold will manage the processing time to ensure feedstock is left uncovered overnight. All bags and the composting system are kept inside a locked enclosed warehouse. All feedstocks will be processed into the staging areas and assured leak proof containment.
- Procedure for monitoring internal temperature and moisture shall be provided in the operations plan, specifying the ranges for the composting cycle contingencies for not meeting the specified ranges. Internal temperature and moisture monitoring shall be recorded prior to turning of each window every 17 feet at a depth of 20 inches.
 - Per 252:515-43-62, Oklahoma Green to Gold will conduct temperature monitoring in accordance with said procedure. Our procedure for monitoring the temperature inside of the vessel will be to use a pole thermometer to check the internal temperature of the compost. The temperature will be checked and recorded on a vessel log.
- The composting process shall be considered complete when the internal temperature remains below 70°F or temperature specified in the permit.
 - Yes
- Odor control measures including increasing aeration shall be implemented whenever odors are detectable outside the facility.
 - Yes
- Operations of an in-vessel aerated static pile, static pile and hybrid composting facility shall be defined in the operations plans.
 - **See exhibit #10**
- Fire protection: Open burning of solid waste is prohibited.
 - **N/A as Oklahoma Green to Gold will not do any open burning of solid waste.**
- Dust Control: Measures to be taken to control dust. Narrative of control measures to be included.
 - In accordance with 252:515-19-36(c), Oklahoma Green to Gold will monitor dust creation at all times.
- Disease vector control measures using techniques appropriate for the protection of human health and environment. Narrative of control measures to be included.
 - With the use of the in-vessel method of composting, the compost pile will be inside of the container therefore, mitigation the risk of diseased vectors.
- Class I and Class II design standards: must meet location restrictions listed in OAC 252:515 Subchapter 5, Part 3. Contact water must be segregated and directed to containment. Composting operation shall take place on an all-weather composting pad that prevents ponding, prevents conditions that could contribute to a release to the environment.
 - Included in the existing permit application.

- Class III design standards: must meet Class I and Class II design standards. Composting activities must take place on an all-weather pad meeting the following criteria: 5 feet must have a hydraulic conductivity of 1×10^{-5} cm/sec or less; or be a constructed surface. An all-weather pad with a sufficient slope to direct contact with water should be used.
 - Class III Design Standards. In accordance with 252:515-43-72 and 252:515-43-58, all composting activities will be taking place inside an enclosed warehouse. The flooring of the warehouse is concrete. All these controls will eliminate the risk of direct contact water.
 - ❖ **Location restrictions:** The proposed facility meets all location restrictions per items No 33-39 outline herein.
 - ❖ **Contact water control:** Contact water must be segregated and directed to containment, recycling, and/or treatment systems. “Contact water” means water that has come in contact with raw feedstocks or active composting piles. Contact water regulations will be met as the compost is stored inside of the facility and feedstock is processed inside of the composting vessel, eliminating the potential for contact water.
 - ❖ **Stormwater run-on/ run-off control:** Oklahoma Green to Gold will use “in-vessel composting” with the vessel(s) located indoors, which will eliminate the need for storm water run-on/ run-off. Storm regulations will be met as the compost is stored inside of the facility and feedstock is processed inside of the composting vessel, eliminating the potential for stormwater infiltration.
 - ❖ **All-weather pad:** Oklahoma Green to Gold will be using “in-vessel composting”, with vessel(s) located indoors on a concrete floor. No groundwater will ever be near any stored, processed, or composting material as facility is on a concrete pad inside of a warehouse. The off-gas process is also completed indoors in shipping containers.
 - ❖ **Windrow Construction:** N/A as we are not doing windrow composting.

3.5 Water Management

The entire facility site shall be constructed so as to minimize the runoff. Plans and specifications regarding the design, construction & maintenance of run-on/ run-off control systems & handling of contact water as outlined in 252:515-17-2 are required. In addition, facilities shall be designed, constructed and operated in a manner that will prevent and avoid contamination.

- Contact water must be segregated and directed to containment recycling and/or treatment system sized to handle a minimum 24-hour 25-year storm event. For Class I-IV composting facilities, stormwater shall be managed in compliance with subchapter 17.
 - The feedstock material, once picked up, will be kept in the van, then dropped off at the “receiving area” for the sorting process. Once in the receiving area, it will go through the composting process and be kept inside, not exposed to any elements. Stormwater/ contact water will not be an issue as the feedstock and/or the compost will be exposed at any time.
 - Oklahoma Green to Gold’s facility is indoors, so the concern of stormwater is eliminated.

4.0 Ground Monitoring

252:515-43-91: Class III and IV composting facilities shall submit a groundwater monitoring program to DEQ for review and approval consistent with requirements in OAC 252: 515 Subchapter 9, as applicable.

- Groundwater monitoring program shall include a sample analysis plan; establish background water quality; perform detection monitoring; reporting results; and conduct assessment monitoring and corrective action, if necessary.
 - At this time Oklahoma Green to Gold is requesting a variance from 252:515-9-(All) and 252:515-43-91 as it relates to Groundwater Monitoring. Oklahoma Green to Gold is processed completely indoors, in an enclosed warehouse and locked/sealed shipping containers, so the concern of groundwater monitoring is eliminated. We utilized an in-vessel composting inside of a building that has concrete flooring as well as the compost curing/off gas process will take place inside shipping containers with sealed floors, and therefore there is no potential for feedstock, contact water, contaminants, or compost to come in contact with groundwater.
- Groundwater monitoring program requirements. At a minimum monitoring shall include pH, chemical oxygen demand, specific conductivity, chloride, sulfate, calcium, magnesium, nitrates, sodium carbonates, and potassium.
 - At this time Oklahoma Green to Gold is requesting a variance from 252:515-9-(All) and 252:515-43-91 as it relates to Groundwater Monitoring. Oklahoma Green to Gold's process is completely indoors, in an enclosed warehouse and locked/sealed shipping containers, so the concern of groundwater monitoring is eliminated. We utilized an in-vessel method which is on all-weather pad. No material will ever be stored, cured, or processed outdoors. Oklahoma Green to Gold conducts in-vessel composting inside a building that has concrete flooring as well as the compost curing/off gas process will take place inside shipping containers with sealed floors, and therefore there is no potential for feedstock, contact water, contaminants, or compost to come in contact with ground water.
- Filtering prohibition: Groundwater samples shall not be filtered in the field or in the lab or prior to analysis.
 - At this time Oklahoma Green to Gold is requesting a variance from 252:515-9-(All) and 252:515-43-91 as it relates to Groundwater Monitoring. Oklahoma Green to Gold's process is completely indoors, in an enclosed warehouse and locked/sealed shipping containers, so the concern of groundwater monitoring is eliminated. We utilize in an-vessel composting inside a shipping containers with sealed floors, therefore there is no potential for feedstock, contact water, contaminants, or compost to come in contact with groundwater.
- Monitor Well Location: Wells are to be located on land owned or leased by the owner of the facility & placed no more than 150 meters (492.13 feet) from the waste management unit boundary. Number, spacing, and depths of monitoring wells to be based on site-specific technical information.
 - At this time Oklahoma Green to Gold is requesting a variance from 252:515-9-(All) and 252:515-43-91 as it relates to Groundwater Monitoring. Oklahoma Green to Gold's process is completely indoors, in an enclosed warehouse and locked/sealed shipping containers, so the concern of groundwater monitoring is eliminated. We utilize in an-vessel composting inside a shipping containers with sealed floors, therefore there is no

potential for feedstock, contact water, contaminants, or compost to come in contact with groundwater.

- **Monitor Wells Required:** A minimum of three (3) monitor wells are required to yield samples from the uppermost aquifer. At least one (1) monitor well to be located up-gradient and at least two (2) monitor wells hydraulically down-gradient of the facility based on the actual potentiometric contour map.
 - At this time Oklahoma Green to Gold is requesting a variance from 252:515-9-(All) and 252:515-43-91 as it relates to Groundwater Monitoring. Oklahoma Green to Gold's process is completely indoors, in an enclosed warehouse and locked/sealed shipping containers, so the concern of groundwater monitoring is eliminated. We utilize in-vessel composting inside a shipping containers with sealed floors, therefore there is no potential for feedstock, contact water, contaminants, or compost to come in contact with groundwater.
- **Design & Construction:** Wells must be constructed and/or plugged as set forth in OAC 785:35-11. All monitor wells must be maintained and operated so that design specifications are met throughout the life of the monitoring program.
 - At this time Oklahoma Green to Gold is requesting a variance from 252:515-9-(All) and 252:515-43-91 as it relates to Groundwater Monitoring. Oklahoma Green to Gold's process is completely indoors, in an enclosed warehouse and locked/sealed shipping containers, so the concern of groundwater monitoring is eliminated. We utilize in-vessel composting inside a shipping containers with sealed floors, therefore there is no potential for feedstock, contact water, contaminants, or compost to come in contact with groundwater.

4.1 Compost Testing Standards

Class III and IV facilities must include a testing protocol for the finished compost material.

- In accordance with 252:151-43-111, testing is completed on compost by Ward Laboratories for metal and other nutrients. Oklahoma Green to Gold's testing protocol meets the Department of Agriculture's metal testing standards.
 - **See Exhibit #16 for metals test.**

4.2 Recordkeeping Requirements

The following information is to be submitted to DEQ, and a copy retained in the operating record of the facility according to OAC 252:515-19-40. The operating record is to be maintained until DEQ has approved closure of the facility.

- **General:** Facility shall submit to DEQ & maintain in the operating records any location restriction demonstrations, daily operational records inspection records, monthly and annual reports, documentation & analyses demonstrating the nonhazardous classification of wastes received, monitoring or testing data required, closure plans, and any cost estimates & financial assurance approves the facility to cease maintenance.

- Oklahoma Green to Gold will submit and maintain all DEQ operating records in accordance with 252:515-19-40. Records shall be maintained on site until site closure or DEQ approves the facility to cease maintenance, whichever comes first.
- Recordkeeping: Daily logs shall be maintained that identify the weight or volume of incoming feedstocks and outgoing compost, windrow internal temperatures, and a record of which windrows were turned.
 - In accordance with 252:515-43-66, Oklahoma Green to Gold will maintain daily logs of total weight of incoming feedstocks and all outgoing compost. The daily logs will readily be available at all times for the DEQ.
- Reporting requirements: Class III and IV composting facilities are required to submit monthly reports including the amount of total feedstock material received; amount of non-compostable material shipped for disposal and the name of the permitted site receiving the material; and amount of composting material on site.
 - In accordance with 252:515-43-34, Oklahoma Green to Gold will submit monthly reports of total weight of incoming feedstock and all outgoing compost and worm castings, along with the amount of non-compostable material shipped for disposal and the location said material was shipped to monthly. Monthly reports will be submitted to DEQ.
- Class III & IV facilities meeting the definition of a commercial composting facility in a 27A O.S. § 2-10-103 must submit fees. Fees shall be collected and remitted to DEQ quarterly in accordance with 27A O.S. § 2-10-802(B). Fees shall be reported in a format prescribed by DEQ. A commercial composting facility: a) is not owned or operated by a governmental entity, b) receives 100 tons or more per year of feedstock, any part of which is food waste, and c) principally accepts non-agricultural feedstock.
 - Per the definition in 27A 2-10-103, Oklahoma Green to Gold does meet the definition of a commercial composting facility and will submit monthly reports. Oklahoma Green to Gold will pay fees quarterly to DEQ in accordance with this statute.

4.3 Closure/Post-Closure

- Closure Plan: Identification of site-specific closure activities with detailed narrative descriptions of how each is expected to be performed, a schedule for completion, and estimated cost of each activity. The itemized written cost estimate must assume the cost of hiring a third party to complete closure activities.
 - **See Exhibit #11**
- Composting facilities shall conduct post-closure monitoring and care for a period specified by the DEQ if it is determined that post-closure monitoring and care are necessary due to soil or surface groundwater contamination from activities performed at the site facility.
 - Oklahoma Green to Gold should not have any post-closure monitoring measures as there should not be any groundwater or soil contamination testing necessary (all our operations will be indoors).

4.4 Financial Assurance: Class III and IV are required to have financial assurance as specified in OAC 252:515-27.

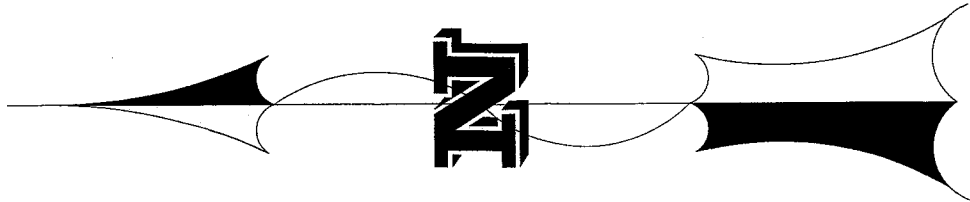
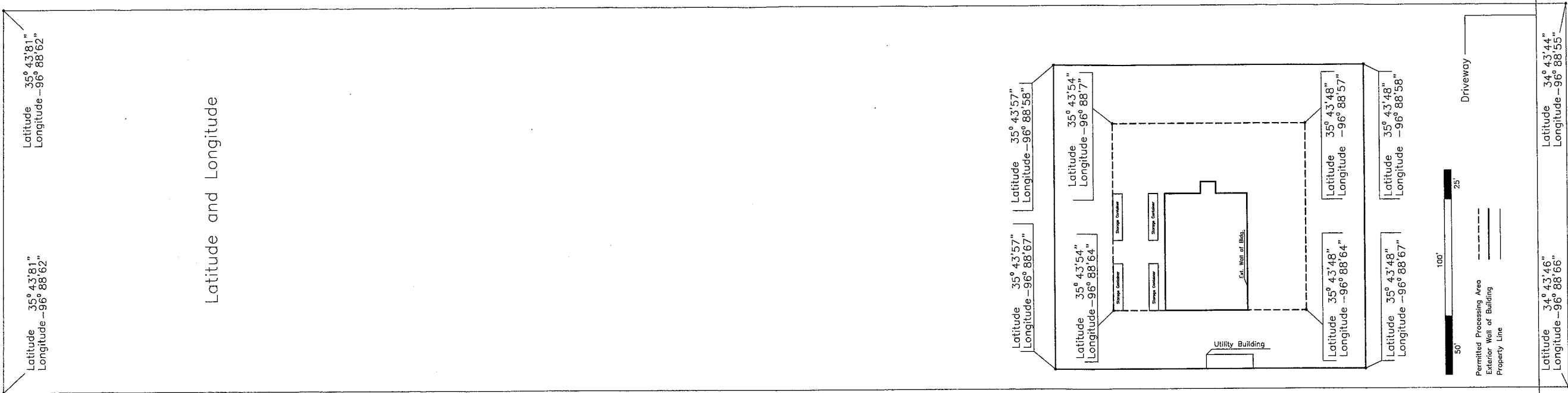
- Financial assurance will be established based on the closure cost estimate in the closure plan for removal and disposal, by a third party of the maximum amount of feedstock and product material the site is capable of storing, plus removal of equipment, temporary buildings, and establish permanent vegetation at the facility.
 - **See Exhibit #12**
- Financial Assistance: A non-negotiable instrument guaranteeing sufficient funds for the adequate completion of closure upon the failure of the permittee to fully complete performance according to the terms of the permit and applicable law. Types of financial assurance considered acceptable are trust funds surety bond guaranteeing payment or performance, letter of credit, insurance, certificate of deposit, cash or other state approved mechanism meeting the criteria specified in 252:515-27.
 - **See Exhibit #12**

*****End of Document*****

Exhibit 1
GPS Plan

Oklahoma Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



10-11-24
REGISTERED PROFESSIONAL ENGINEER
PAUL DOUGLAS HARVELL
11025
OKLAHOMA



Exhibit 2
Set Back & Buffer Zone
& Permitted Processing Area

Oklahoma Green To Gold

OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

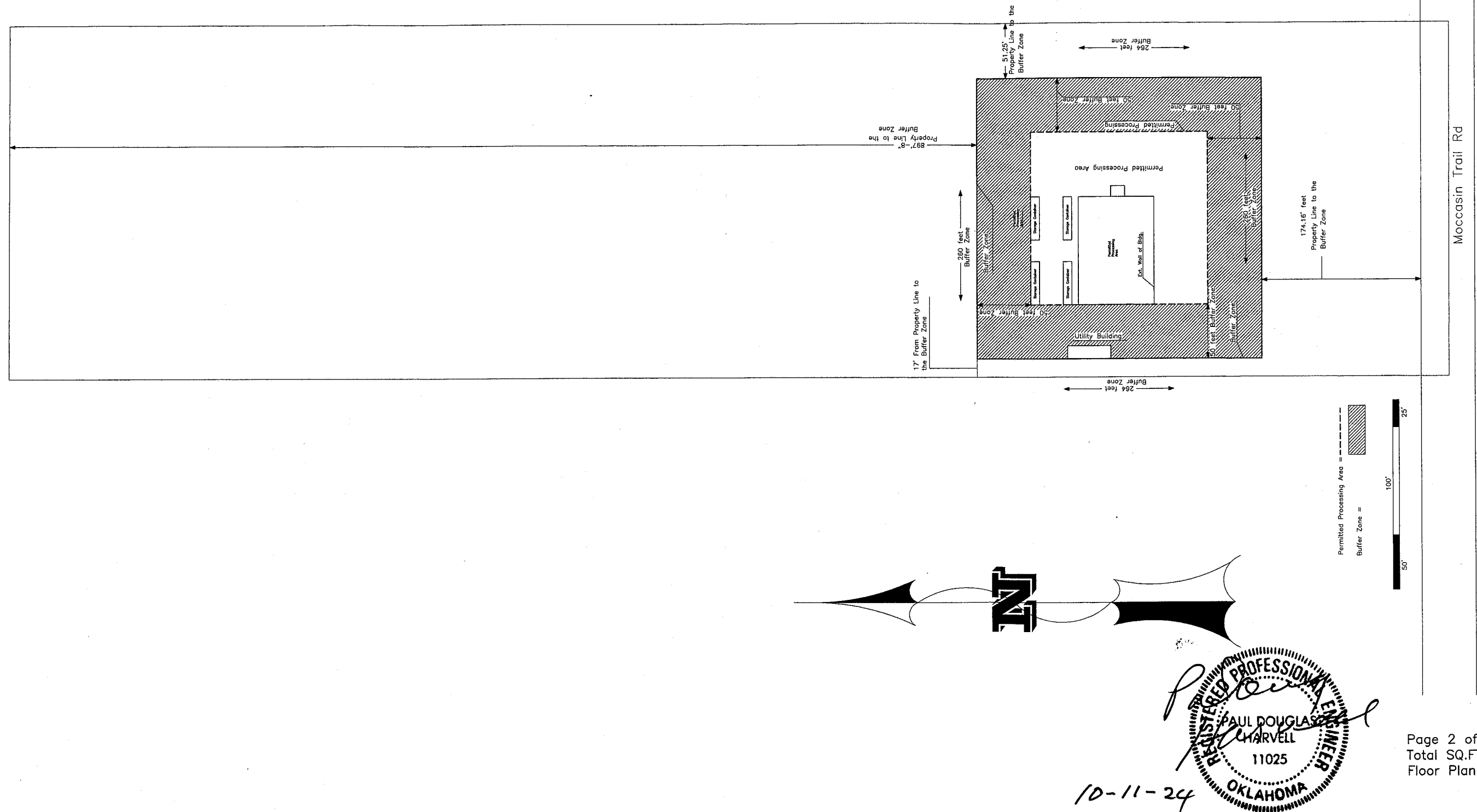
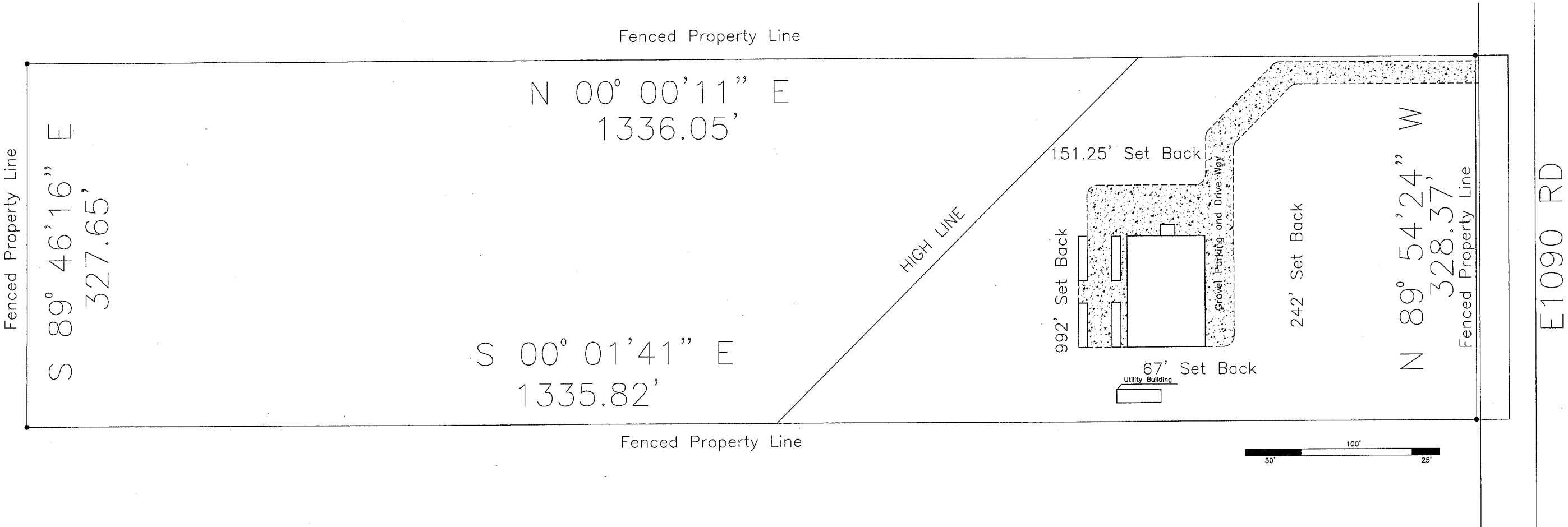


Exhibit 3
Legal Description & Set Backs &
High Line and Fences

The East 1/2 of the East 1/2 of the Southeast 1/4
of the Southwest 1/4 (E/2 E/2 SE/4) In Section Nine (9)
Township Eleven (11) North Range Four (4) East of The
Prime Meridian. Said Tract lies Within Pottawatomie County
in the State of Oklahoma.

Oklahoma Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



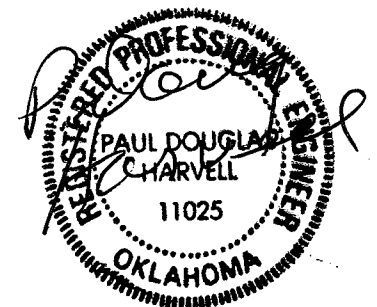
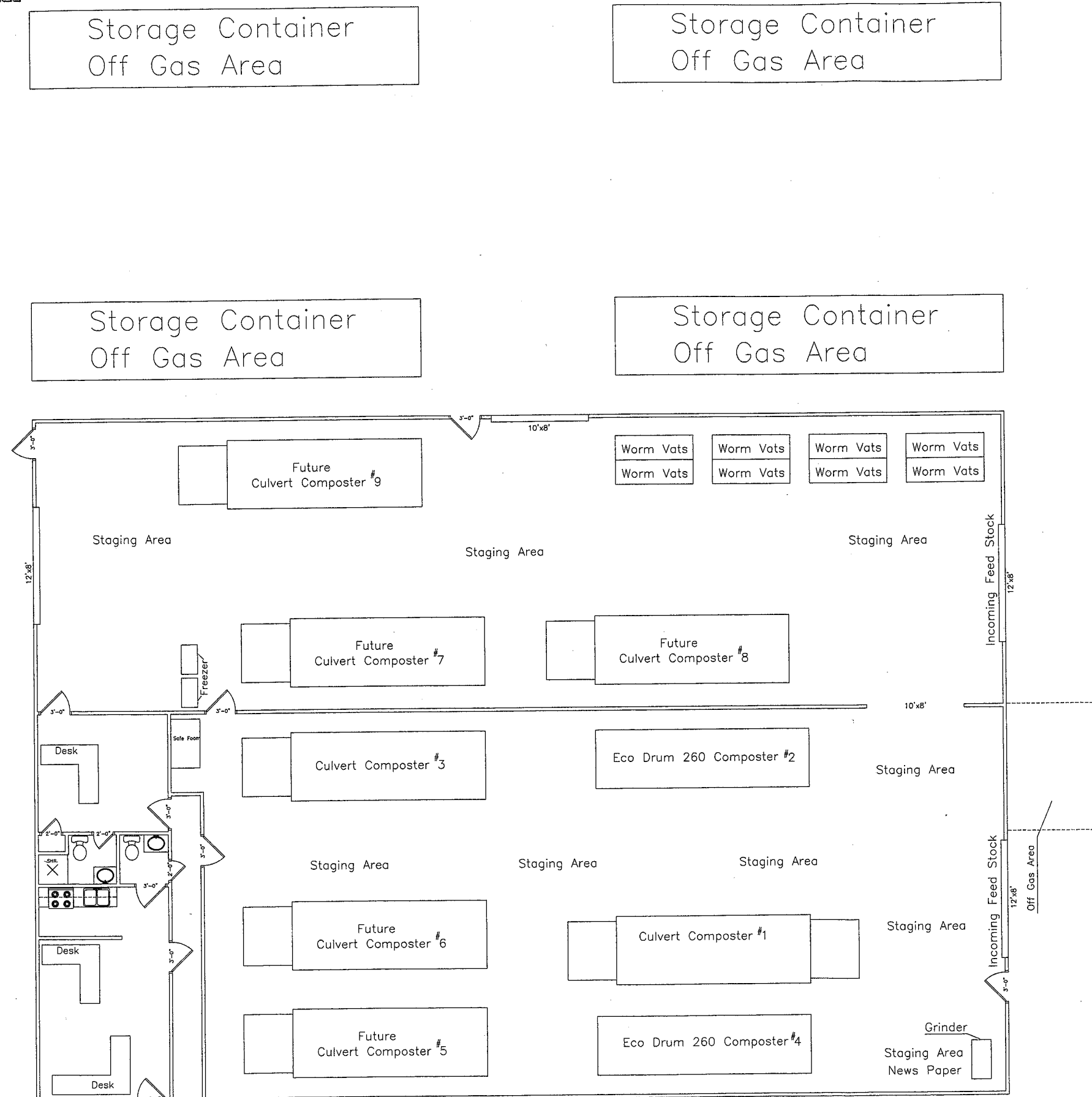
10-11-24

REGISTERED PROFESSIONAL ENGINEER
PAUL DOUGLAS HARVELL
11025
OKLAHOMA

Exhibit 4
Processing Floor Plan

Oklahoma Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

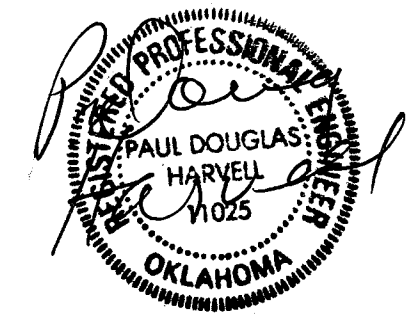
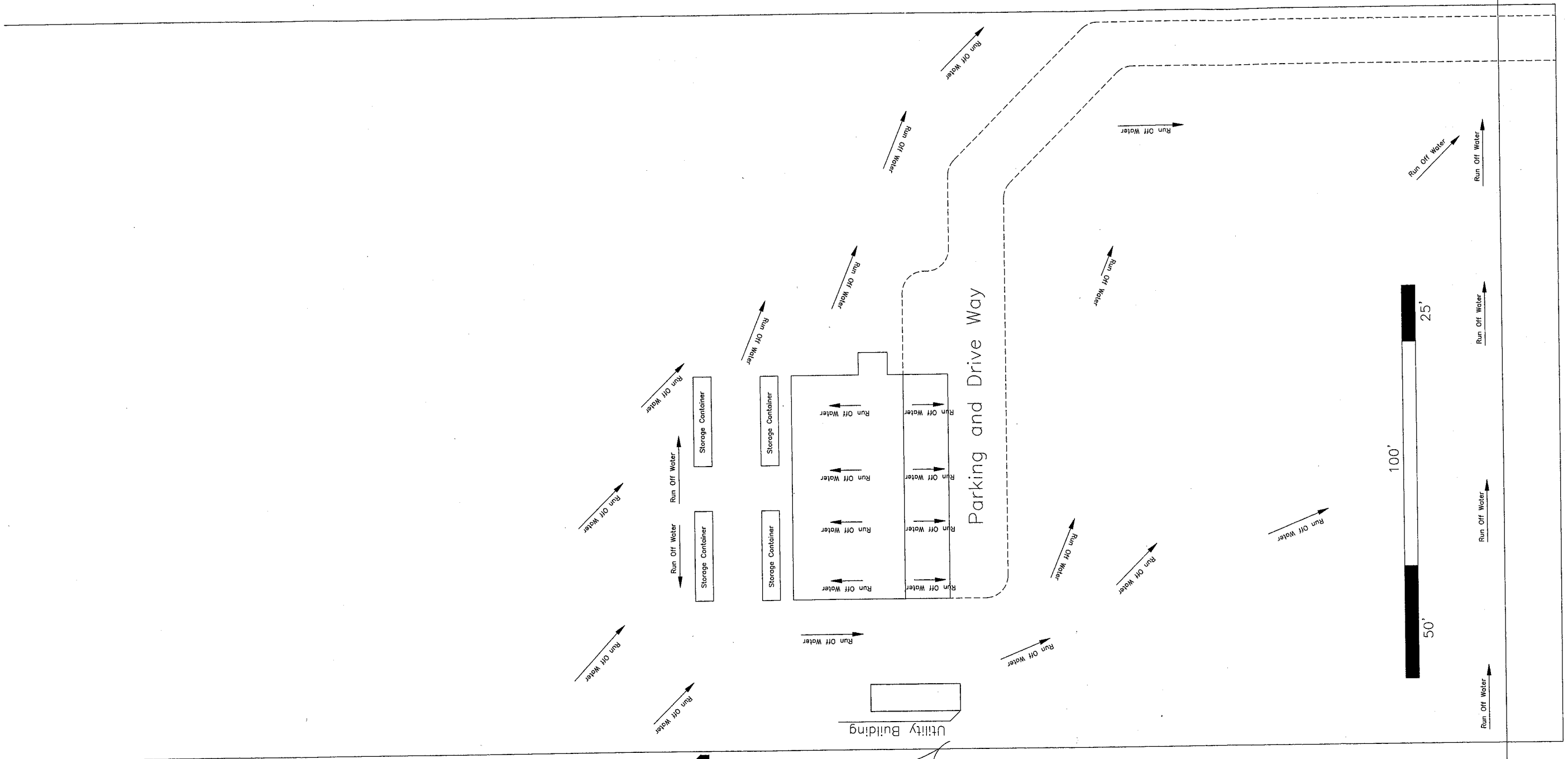


10-11-24 Scale: 1/8"=1'
Page 4 of 8
Total SQ.FT. 7130
Floor Plan

Exhibit 5
Water Run Off Plan

Oklahoma Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

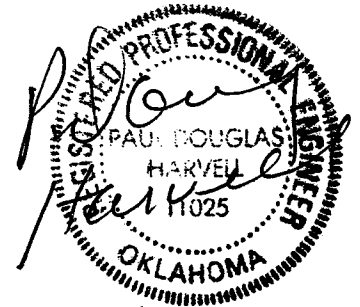
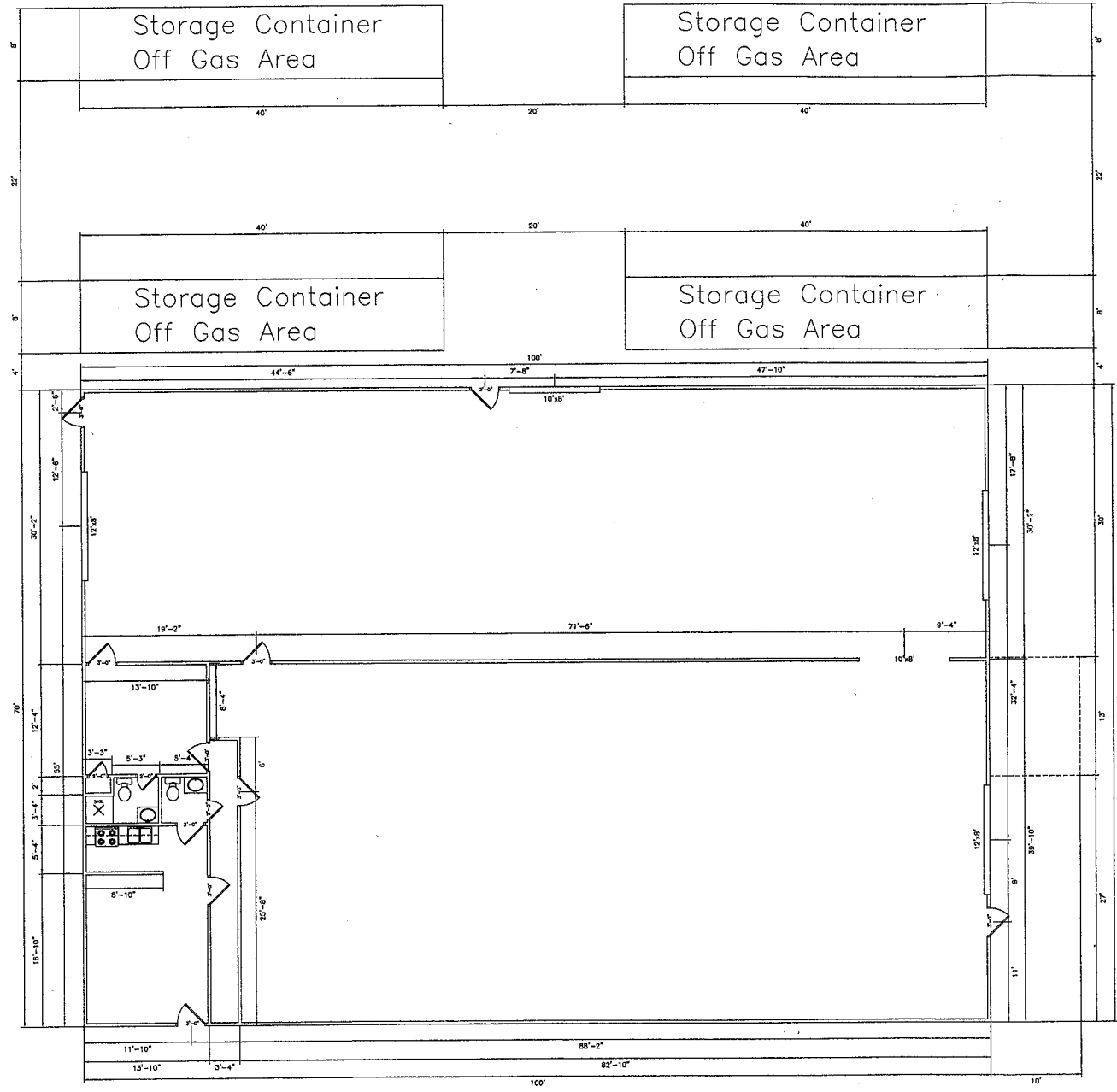
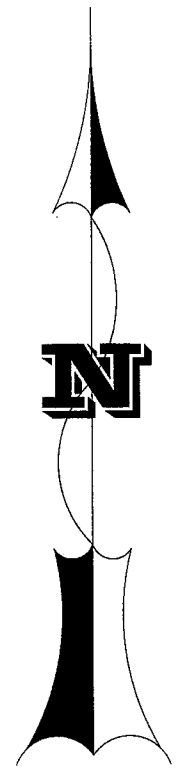


10-11-24

Exhibit 6
Floor Plan

Oklahoma Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

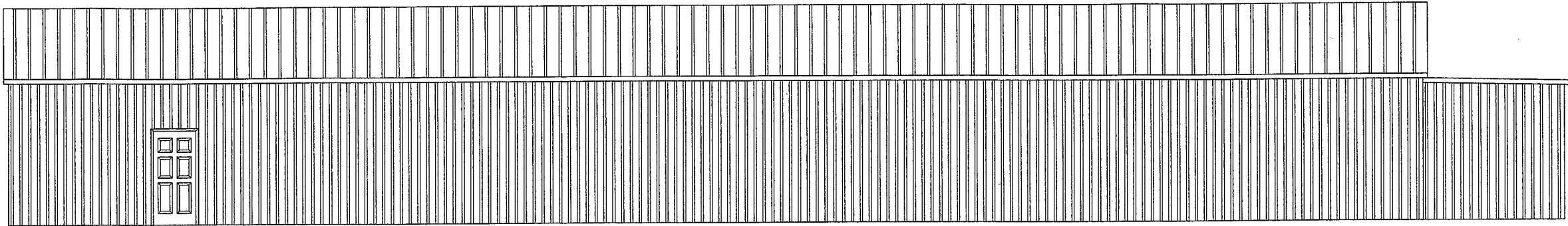


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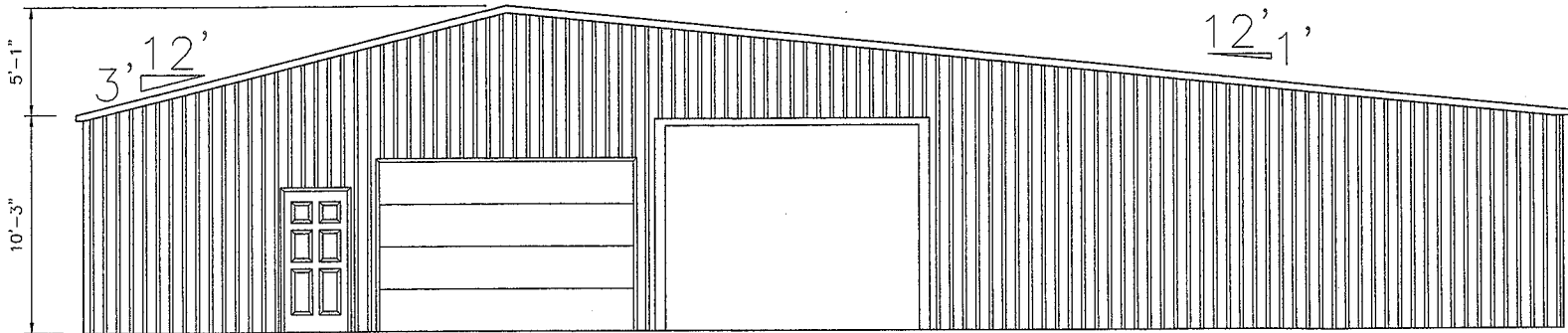
Scale: 1/8"=1'
Page 6 of 8
Total SQ.FT. 7130
Floor Plan

Exhibit 7
Elevations

Oklahoma Green To Gold
OMMA Waste Facility
43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



SOUTH ELEVATION



EAST ELEVATION

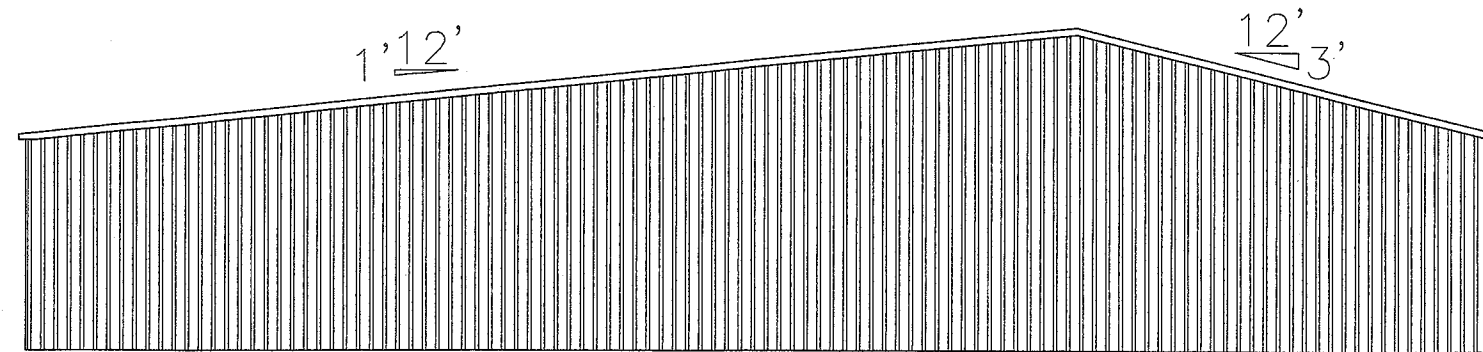
10-11-24

10-11-24

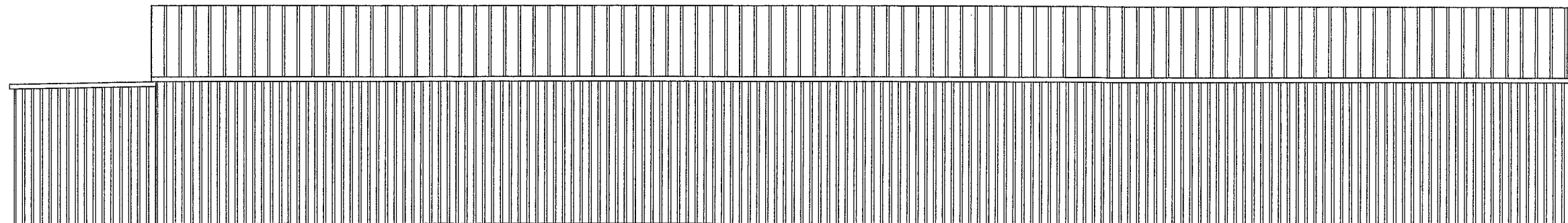
Exhibit 8
Elevations

Oklahoma Green To Gold
OMMA Waste Facility

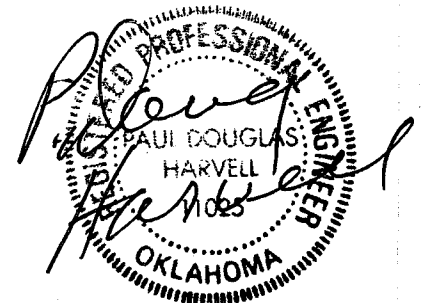
43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



WEST ELEVATION



NORTH ELEVATION



10-11-24
Scale: 1/4"=1'
Page 8 of 8
Total SQ.FT. 7130
Floor Plan

43470 Moccasin Trail Rd
Meeker, OK 74855

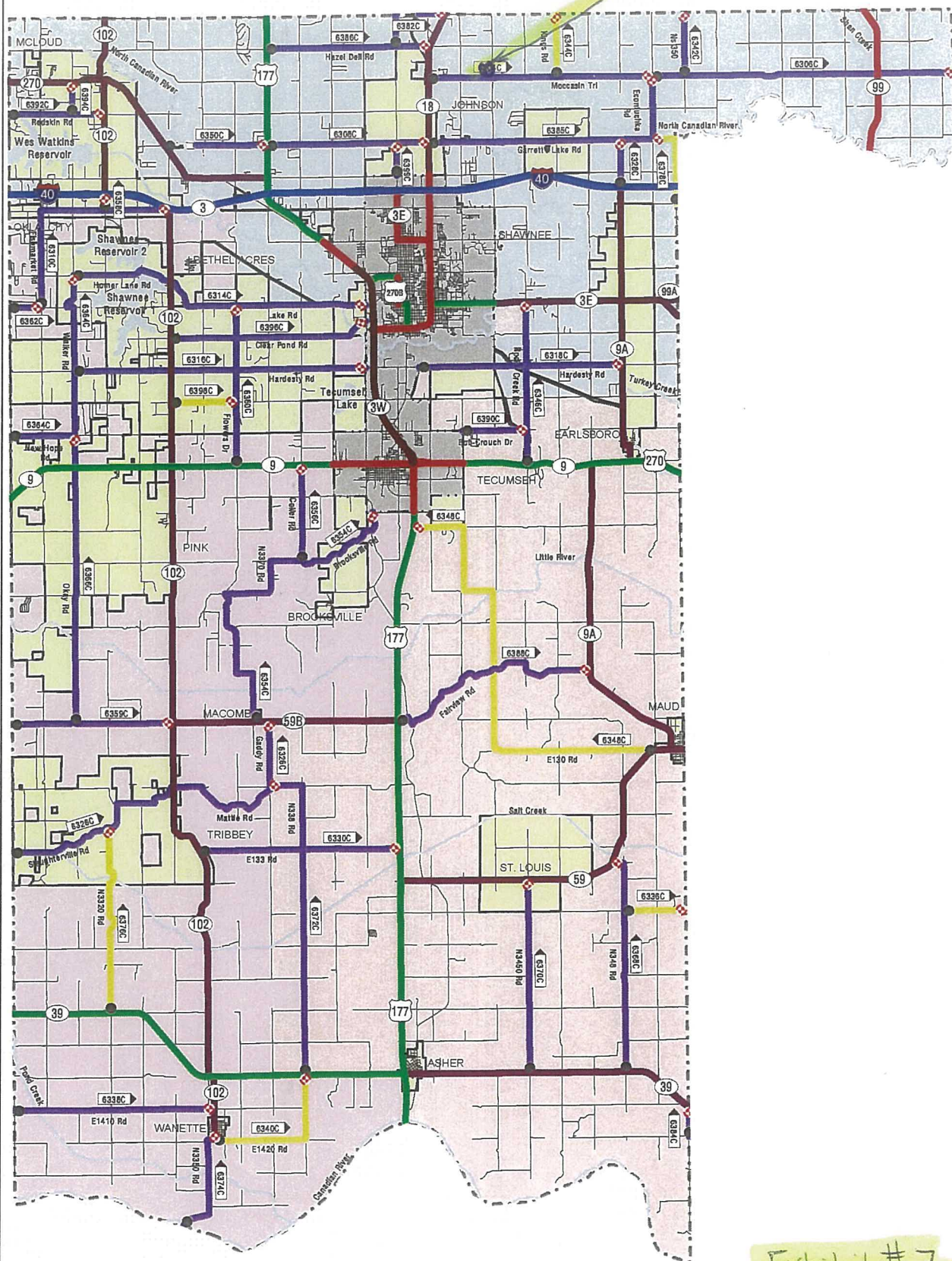



Exhibit # 7

Pottawatomie County
RURAL FUNCTIONAL CLASSIFICATION (RFC)

DATE: June 30, 2004

G:\2004_RFC\Pottawatomie RFC_2000.gws



OKLAHOMA DEPARTMENT OF TRANSPORTATION
600 MAYNARD STREET, SUITE 100
TULSA, OKLAHOMA 74103

<ul style="list-style-type: none"> — INTERSTATE — FREEWAY/EXPRESSWAY — PRINCIPAL ARTERIAL — MINOR ARTERIAL — MAJOR COLLECTOR-HIGHWAY — MAJOR COLLECTOR-COUNTY 	<ul style="list-style-type: none"> — MINOR COLLECTOR — PROPOSED ROUTE — LOCAL ROAD ● RFC ENDING POINT ● RFC BEGINNING POINT 1234C RFC NLF ID & DIRECTION 	<ul style="list-style-type: none"> COMMISSIONER DISTRICT 1 COMMISSIONER DISTRICT 2 COMMISSIONER DISTRICT 3 CITY LIMITS URBAN AREA BOUNDARY
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Application filed. A solid waste Tier III application has been filed with the Department of Environmental Quality (DEQ). Interested persons now have the opportunity to meet with the DEQ and learn how and where they may participate in the permitting process.

Applicant: The applicant is Oklahoma Green to Gold Recycling, LLC at 43470 Moccasin Trail Rd Meeker, Ok 74855.

Type of final permit or permit action being sought: The applicant seeks to modify an existing permit.

Facility location: The waste facility is located at 43470 Moccasin Trail Rd Meeker, Ok 74855.

Activities to be regulated if the application is approved: Due to increases in capacity demand Oklahoma Green to Gold Recycling is requesting an increase to greater than 100 tons/year of solid waste. Oklahoma Green to Gold is also requesting to add on to our existing facility to make room for additional compost machines. These capacity and construction changes will help Oklahoma Green to Gold keep up with the increasing solid waste input demands.

Oklahoma Green to Gold Recycling, LLC is requesting a variance from 252:515-9-(All) and 252:515-43-91 as it relates to Groundwater Monitoring due to all composting processes will be completed indoors.

Statutes and Rules: The DEQ will review the application for compliance with the Environmental Quality Code, including the Solid Waste Management Act, Title 27A of Oklahoma Statutes, Section 2-10-101, et seq., and the rules of the DEQ, Oklahoma Administrative Code, Title 252, Chapters 4 and 515.

Permitting procedures explained: On request, a representative of DEQ will chair a meeting to explain the steps of DEQ's permitting process to interested persons. If a meeting is requested, there will be discussion explaining when oral and written public comments can be made on the proposal. Administrative hearing opportunities will also be discussed. To request a process meeting, send a written request to the DEQ representative named below withing 30 days after the date this notice is published. Please note this is not a meeting for protests. Its purpose is to advise interested persons on participation opportunities during the permitting process. For more information about this process meeting, please contact the DEQ representative named below.

Locations where application may be reviewed:

1. Locally at Meeker Public Library located at 616 Carl Hubbell Blvd. Meeker, Ok 74855.
2. The DEQ's Central Records Section, located on the 2nd floor of the DEQ building at 707 N. Robinson, Oklahoma City, Oklahoma.
3. DEQ's website at <https://www.deq.ok.gov/land-protection-division/permit-public-participation-process/>.

For more information, contact:

1. For applicant: Darrel Armer 479-651-0950
2. For DEQ: Lyndsey Murray, DEQ, Land Protection Division, P.O. Box 1677, Oklahoma City, OK 73101-1677; (405)702-5134; Fax No. (405)702-5101.

OPERATIONAL PLAN

COMPOST FACILITY: Oklahoma Green to Gold Recycling, LLC

FACILITY ADDRESS: 43470 Moccasin Trail Rd Meeker, Ok 74855

PERMIT #: 3563007

HOURS OF OPERATION: 8:00-5:00 Monday-Friday

EMERGENCY CONTACT INFORMATION: Office Cell 405-395-7041, Darrel Armer
479-651-0950

1. EMERGENCY ISSUES

If any odors, vectors, contact water or storm water are recognized, notify management immediately. Management will implement emergency mitigation tactics after identifying the location and cause of the issue. Management will prepare an incident report and contact the DEQ to notify them of the issue after mitigation. Fires shall be put out immediately by using one of the fire extinguishers located in accordance with the fire marshals' standards and requirements. After the fire has been mitigated, management shall be notified so they can contact the DEQ and prepare an incident report.

2. ACCESS CONTROL

Access controls shall be maintained in accordance with 252:515-43-58(a) of the ODEQ requirements. The current operational guidelines are as follows.

At the end of the day, the gates to enter the facility shall be closed and locked. The metal fence will eliminate unnecessary and unlawful dumping. The facility will be under constant monitoring via security cameras. Facility building doors are always locked, and accessible with key or keypad code only.

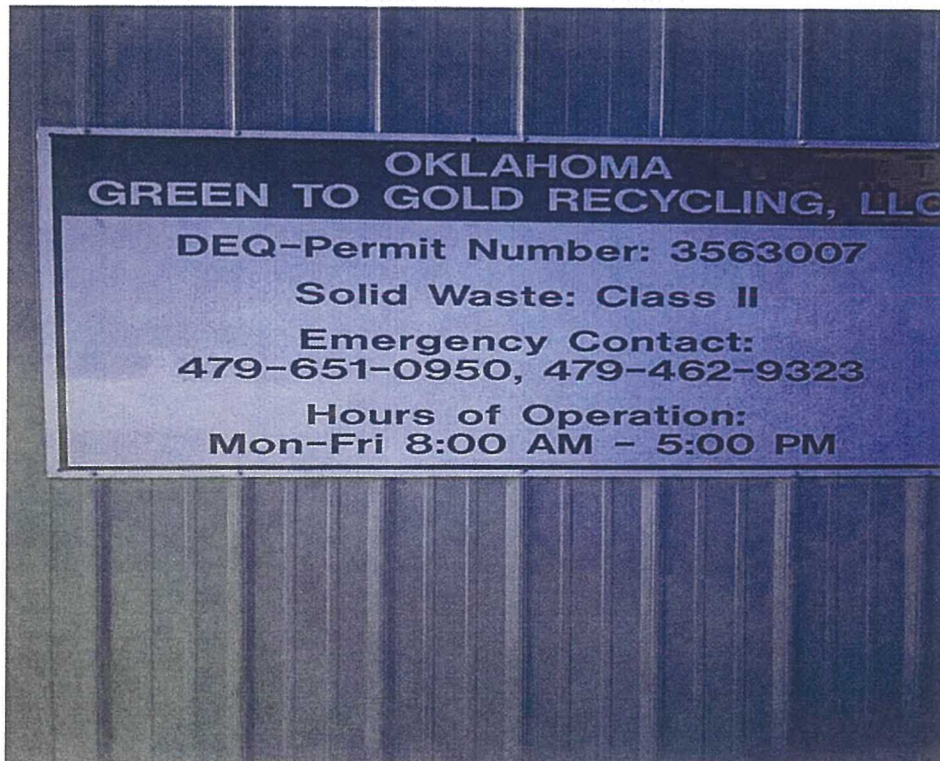
3. SIGNAGE

Signage shall be maintained in accordance with 252:515-43-58(b) of the ODEQ requirements. The current operational guidelines are as follows.

As long as Oklahoma Green to Gold is operating, there shall be a visible, clean, and aesthetically pleasing sign outside of the building. The sign will be maintained by management and will be

repaired within 48 hours of noticing any issues with the signage. At the entrance of the facility, there is a sign showing the following.

- a. NAME OF THE FACILITY
- b. PERMIT #
- c. FACILITY CLASS
- d. HOURS OF OPERATION
- e. EMERGENCY CONTACT INFORMATION



4. BUFFER ZONES

Buffer zones shall be maintained in accordance with 252:515-43-58(c) of the ODEQ requirements. The current operational guidelines are as follows.

All feedstocks shall never protrude outside of the enclosed processing facility unless in an enclosed bin for transport, inside a compost bin, or another manner that is considered secure. No feedstock shall come within 50 feet of any adjacent property.

5. RECEIVING AREAS

Receiving areas shall be maintained in accordance with 252:515-43-58(d) of the ODEQ requirements. The current operational guidelines are as follows.

a. Unloading areas will be identified as “receiving area”. This is the only area that employees may bring material. If inclement weather at the time of drop off, vans shall make all efforts to back through the garage door so that feedstock will not be in the elements.

b. Customer Drop Off: Customers will have the ability to bring their bins to the facility for processing. Customers doing so will be required to show their transport license provided by OMMA. Customers without a proper OMMA license will be denied service until documentation is provided. Employees will greet the customer, check documentation, weigh material, require a signature to verify drop off/weight, and provide the customer with a receipt. All material dropped off will be immediately moved to the processing area to begin the sorting stage of the process.

6. PROCESSING AREA

Processing areas shall be maintained in accordance with 252:515-43-58(e) of ODEQ requirements. The current operational guidelines are as follows.

The processing area is identified as the entire warehouse and shall remain the processing area. This area shall be maintained in accordance with DEQ 252:515-43-58(e) and according to OSHA standards. No product shall be stored for longer than 48 hours without being processed.

7. FINISHED PRODUCT

Finished compost shall be maintained in accordance with 252:515-43-58(f) of the ODEQ requirements. The current operational guidelines are as follows.

After the compost has fully been cured, it will be bagged and stored onsite. It must be properly bagged and not stored on site for longer than 12 months per DEQ guidelines.

8. COMPOST STANDARDS

Oklahoma Green to Gold Recycling composts by using an in-vessel method. All composting vessels will be placed on an all-weather pad to ensure no contact water leaks onto the processing facility floor to prevent trip hazards and/or other potential issues.

MEDICAL MARIJUANA COMPOST
STANDARD OPERATING PROCEDURE (SOP)
(PROCEDURE FOR APPROXIMATELY 2000-POUNDS)

CULVERT COMPOSTER

#1

- If waste medical marijuana is received in small plastic containers/bags open each container/bag and pour into black plastic totes and place the yellow lids onto them in preparation to pour into composter #1, weigh, and stage container(s) at each end of composter.
- If waste medical marijuana is received in plastic trash bags prepare each bag to pour into composter #1, weigh, and stack at each end of composter.
- Confirm that approximately 200-pounds of compost is left in the bottom of the composter from previous emptying.
- Set up the work platform at the east end of composter #1 and remove the temperature probes located on the southeast end and bottom side of the undercarriage.
- Proceed with pouring stored waste medical marijuana into the east end of the composter until that part of the composter is full.
- Water evenly across the surface with approximately 40 to 50 gallons of water.
- Move platform to opposite end of composter #1 and repeat – filling and watering process until composter #1 is full. Add an additional 30 to 40 gals of water.
- Once both ends are full of waste medical marijuana, close both doors, latch with safety pins, and remove all items from the path of rotation.
- **Alert all personnel** in the shop area that the composter is being cycled and all personnel should remain clear of composter #1 rotation path.
- Stop composter #1 and repeat – filling and watering process until desired amount/weight of waste medical marijuana and water have been reached. The desired water to waste medical marijuana ratio needs to be 80 to 90 gals of water – to approximately 2000 pounds of waste medical marijuana. Approximately one gal of water to 18 to 22 pounds of waste.
- Close and latch doors with safety pins.
- **Alert all personnel** in the shop area that the composter is being cycled and all personnel should remain clear of composter #1 rotation path.
- Rotate the composter #1 on day 3 or 4 and add an additional 10-15 gals of water.
- Rotate the composter #1 on day 6 or 7 and add an additional 10-gals of water.

- Document – date, water amount, waste weight, waste type, and temperature daily. All distributed material must be maintained at a minimum average temperature of 55°C (131°F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113°F).
- All processing is completed indoors which controls nuisance odors, vectors, contact water, and stormwater.
 - Compost off gas stage is completed on the 10'X13' all weather concrete slab and 8'x40' shipping containers. This area has an overhead cover to control stormwater contamination. Finished compost shall cure for a minimum of two weeks before distribution and use if being sold.
 - Given the high nitrogen content and the duration of the compost processing, we do not anticipate any vectors to be a nuisance.
- Storage of finished compost on site is limited to 12 months.
- If the machine breaks down, order new parts as needed. Due to having multiple compost machines, production will not have to stop. Additional compost machines may be purchased as production needs increase. The compost area shall be maintained and repaired as needed.

Revision #3 (8-26-24)

MEDICAL MARIJUANA COMPOST
STANDARD OPERATING PROCEDURE (SOP)
(PROCEDURE FOR APPROXIMATELY 1200-POUNDS)

ECO DRUM COMPOSTER

#2

- If waste medical marijuana is received in small plastic containers/bags open each container/bag and pour into black plastic totes and place the yellow lids onto them in preparation to pour into composter, weigh, and stage container(s) at west end of composter.
- If waste medical marijuana is received in plastic trash bags prepare each bag to pour into composter, weigh, and stack at west end of composter.
- Confirm that approximately 200 pounds of compost is left in the bottom of the composter from previous emptying.
- Set up the work platform at the west end of composter and prepare to start pouring bags into composter.
- Proceed filling composter until that part of the composter is full. Add approximately **20 gals** of water as you pour in the waste.
- Close and latch the door with all three latches.
- **Alert all personnel** in the shop that you're cycling the composter.
- Flip toggle switch to the Manual position and allow to rotate for at least two cycles – should take approximately 25 minutes.
- Flip toggle switch to the OFF position, open the door and proceed pouring waste medical marijuana into the composter until it's full. Add approximately **20 gals** of water as you pour in the waste.
- **Alert all personnel** in the shop that you're cycling the composter.
- Flip toggle switch to the Manual position and allow to rotate for at least two cycles – should take approximately 25 minutes.
- Flip toggle switch to the OFF position, open the door and proceed pouring waste medical marijuana into the composter until it's full. Add approximately **20 gals** of water as you pour in the waste.
- After three times of filling, adding water, and cycling the composter, it should have approximately 1200 pounds of waste medical marijuana and 60 gals of water.
- Remind all personnel in the shop area that the composter is being cycled and they should remain clear of composter #2 rotation path.
- Close and latch door with safety pins.
- Document daily and rotate and water Eco Drum composter on the same days as composter #1.

MEDICAL MARIJUANA COMPOST
STANDARD OPERATING PROCEDURE (SOP)
(PROCEDURE FOR APPROXIMATELY 2000-POUNDS)

CULVERT COMPOSTER

#3

- If waste medical marijuana is received in small plastic containers/bags open each container/bag and pour into black plastic totes and place the yellow lids onto them in preparation to pour into composter #3, weigh, and stage container(s) at each end of composter.
- If waste medical marijuana is received in plastic trash bags prepare each bag to pour into composter #3, weigh, and stack at each end of composter.
- Confirm that approximately 200-pounds of compost is left in the bottom of the composter from previous emptying.
- Set up the work platform at the east end of composter #3 and remove the temperature probes located on the southeast end and bottom side of the undercarriage.
- Proceed with pouring stored waste medical marijuana into the east end of the composter until that part of the composter is full.
- Water evenly across the surface with approximately 40 to 50 gallons of water.
- Move platform to opposite end of composter #3 and repeat – filling and watering process until composter #3 is full. Add an additional 30 to 40 gals of water.
- Once both ends are full of waste medical marijuana, close both doors, latch with safety pins, and remove all items from the path of rotation.
- **Alert all personnel** in the shop area that the composter is being cycled and all personnel should remain clear of composter #3 rotation path.
- Stop composter #3 and repeat – filling and watering process until desired amount/weight of waste medical marijuana and water have been reached. The desired water to waste medical marijuana ratio needs to be 80 to 90 gals of water – to approximately 2000 pounds of waste medical marijuana. Approximately one gal of water to 18 to 22 pounds of waste.
- Close and latch doors with safety pins.
- **Alert all personnel** in the shop area that the composter is being cycled and all personnel should remain clear of composter #3 rotation path.
- Rotate the composter #3 on day 3 or 4 and add an additional 10-15 gals of water.
- Rotate the composter #3 on day 6 or 7 and add an additional 10-gals of water.
- Document – date, water amount, waste weight, waste type, and temperature daily. All distributed material must be maintained at a minimum average temperature of 55°C

- Document – date, water amount, waste weight, waste type, and temperature daily. All distributed material must be maintained at a minimum average temperature of 55°C (131° F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113° F).
- All processing is completed indoors which controls nuisance odors, vectors, contact water, and stormwater.
 - Compost off gas stage is completed on the 10'X13' all weather concrete slab and 8'x40' shipping containers. This area has an overhead cover to control stormwater contamination. Finished compost shall cure for a minimum of two weeks before distribution and use if being sold.
 - Given the high nitrogen content and the duration of the compost processing, we do not anticipate any vectors to be a nuisance.
- Storage of finished compost on site is limited to 12 months.
- If the machine breaks down, order new parts as needed. Due to having multiple compost machines, production will not have to stop. Additional compost machines may be purchased as production needs increase. The compost area shall be maintained and repaired as needed.

Revision #3 (8-26-24)

MEDICAL MARIJUANA COMPOST
STANDARD OPERATING PROCEDURE (SOP)
(PROCEDURE FOR APPROXIMATELY 1200-POUNDS)

ECO DRUM COMPOSTER

#4

- If waste medical marijuana is received in small plastic containers/bags open each container/bag and pour into black plastic totes and place the yellow lids onto them in preparation to pour into composter, weigh, and stage container(s) at west end of composter.
- If waste medical marijuana is received in plastic trash bags prepare each bag to pour into composter, weigh, and stack at west end of composter.
- Confirm that approximately 200 pounds of compost is left in the bottom of the composter from previous emptying.
- Set up the work platform at the west end of composter and prepare to start pouring bags into composter.
- Proceed filling composter until that part of the composter is full. Add approximately **20 gals** of water as you pour in the waste.
- Close and latch the door with all three latches.
- **Alert all personnel** in the shop that you're cycling the composter.
- Flip toggle switch to the Manual position and allow to rotate for at least two cycles – should take approximately 25 minutes.
- Flip toggle switch to the OFF position, open the door and proceed pouring waste medical marijuana into the composter until it's full. Add approximately **20 gals** of water as you pour in the waste.
- **Alert all personnel** in the shop that you're cycling the composter.
- Flip toggle switch to the Manual position and allow to rotate for at least two cycles – should take approximately 25 minutes.
- Flip toggle switch to the OFF position, open the door and proceed pouring waste medical marijuana into the composter until it's full. Add approximately **20 gals** of water as you pour in the waste.
- After three times of filling, adding water, and cycling the composter, it should have approximately 1200 pounds of waste medical marijuana and 60 gals of water.
- Remind all personnel in the shop area that the composter is being cycled and they should remain clear of composter #2 rotation path.
- Close and latch door with safety pins.
- Document daily and rotate and water Eco Drum composter on the same days as composter #1.

(131° F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113° F).

- All processing (with the exception of compost curing stage) is completed indoors which controls nuisance odors, vectors, contact water, and stormwater.
 - Compost off gas stage is completed on the 10'X13' all weather concrete slab and 8'x40' shipping containers. This area has an overhead cover to control stormwater contamination. Finished compost shall cure for a minimum of two weeks before distribution and use if being sold.
 - Given the high nitrogen content and the duration of the compost processing, we do not anticipate any vectors to be a nuisance.
- Storage of finished compost on site is limited to 12 months.
- If the machine breaks down, order new parts as needed. Due to having multiple compost machines, production will not have to stop. Additional compost machines may be purchased as production needs increase. The compost area shall be maintained and repaired as needed.

Revision #3 (8-26-24)

- Document – date, water amount, waste weight, waste type, and temperature daily. All distributed material must be maintained at a minimum average temperature of 55°C (131° F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113° F).
- All processing is completed indoors which controls nuisance odors, vectors, contact water, and stormwater.
 - Compost off gas stage is completed on the 10'X13' all weather concrete slab and 8'x40' shipping containers. This area has an overhead cover to control stormwater contamination. Finished compost shall cure for a minimum of two weeks before distribution and use if being sold.
 - Given the high nitrogen content and the duration of the compost processing, we do not anticipate any vectors to be a nuisance.
- Storage of finished compost on site is limited to 12 months.
- If the machine breaks down, order new parts as needed. Due to having multiple compost machines, production will not have to stop. Additional compost machines may be purchased as production needs increase. The compost area shall be maintained and repaired as needed.

Revision #4 (8-26-24)

SMART ASH CYCLONIC INCINERATOR
STANDARD OPERATING PROCEDURE (SOP)

- Pre-Use Maintenance:
 - Check air filter and ensure it to be clean
 - Check external spark screen and remove ash
 - Check electrical cord for any damaged areas
 - Empty ash from bottom of barrel as needed
- Ignition Procedures:
 - Move SA Incinerator due east of the building at a minimum of 50 ft in the gravel parking area
 - Power up the SA incinerator with the cord located on the SA incinerator using the nearest outlet
 - Load items into the SA incinerator to be disposed
 - Ignite starting material(s)
 - Allow starting material(s) time to engulf into an adequate flame
 - Install the lid (lid vent hole must remain open), quickly tighten all lid clamps (tighten clamps before lid clamps heat up)
 - Energize "SAF-START" and turn on the air flow
 - DO NOT INCINERATE explosive items
 - Approximately 10' clearance should be kept
- Operating Procedures:
 - Before operating SA incinerator, remove the barrel transport safety chain and move the barrel approximately 4" away from the transport frame (this allows air flow around the barrel).
 - Operator is required to stand watch over the SA incinerator to ensure adequate safety before walking away.
 - Operators are required to make routine inspections to ensure safe operations.
- Breakdowns/Repairs:
 - If SA incinerator breaks down, the protocol is to borrow our business partner's SA incinerator until repairs are made.
- Hazards:
 - Company policy is that no incinerating can be conducted during dry, extremely windy conditions.
 - Lawns are kept cut short so that escape fires can be contained and extinguished in a timely manner.
 - Pump up sprayer for extinguishing is located next to the burn barrel area.

Revision #1 (6/8/23)

INCOMING WASTE PROCESS SOP

As waste comes into the waste facility the transporter is responsible for processing the waste.

- Remove waste products from the transporter vehicle using the designated overhead door.
- Log all weights and ID information into the electronic system and receive it in the Metrc software.
- Make sure all waste containers are leak proof and stage in designated area for either: to feed the worms, staging and prepping for compost production, or incinerating.
 - Medical marijuana waste (MMW) that meets the requirements to be fed to worms will be stored under the worm vats, tag and inventory for worm food.
 - All MMW that is not applicable for feeding worms will be staged in areas designated to be composted or incinerated.
 - All scrap foods will be stored or frozen to feed worms only.
 - Waste that will be put back into inventory for a later process date will be stored in the staging area. Waste will then be tagged and inventoried for composting.
 - All MMW must be processed and disposed of within 6 months.
- Put all required OMMA information onto the container so the MMW can be tracked until it is fully processed/disposed of. Take all transport manifests to the front office and place them on the desk to be scanned in and electronically filed.
- Once scanned in and electronically filed, place all paperwork in the cabinet labeled "Manifests" in date order. All records must be kept in order and in the designated area for any compliance inspections.
- Remove and sweep (if necessary) all THC containing waste and trash from the transport vehicle after each run.
-

Revision #2 (8/25/24)

DISPOSING WASTE RECORD KEEPING PROCESS SOP

- Records shall be maintained to identify the weight of all incoming medical marijuana waste (MMW). These records are kept as both a paper copy and an electronic copy.
 - Paper copies are located in the filing cabinet in the main facility office, all in date order and in folders identifying each month. Past years of records are kept in a tote that is labeled with the year and located in the main office as well for easy access.
 - Electronic copies are located on the company's "One Drive" Input and Disposal logs are both labeled. Each customer has a name labeled folder where all manifests/invoices can be located.
- Once waste has been disposed of (by composting, incinerating, or being fed to worms) the facility name, date of acceptance of waste, date of disposal of waste, how much waste was disposed of in pounds, and how they were disposed of is logged into the "Disposal Log".
 - Each compost log is scanned in with the individual facility copies to identify what waste was composted together and when it was composted as well as the temperatures and water amounts added.

Oklahoma Green to Gold Recycling, LLC

Closure Plan

- Remove 16 vats at \$20/hr x 3 persons x 1-days = \$240.00 clean up vats. Vats will need to be broken down and the material placed in rented dumpsters for removal.
- Rent three 30-yd dumpsters to dispose of materials at \$600.00 each = \$1,800.00.
- Estimated cost to remove/relocate additional pieces of equipment – four persons x \$20.00/hr x 1-day = \$640.00. Completed compost can be taken to landfill.
- Transportation fees to ship equipment is approximately \$4,500.00
- Managerial fees at approximately 18% = \$1,119.60
- All compost machines will be removed by facility owners and placed on their private property to be sold.

Total cost of the 2024 financial assurance and closure cost estimates with inflation adjustment rate of 3.64% = \$15,969.41 + 581.29= \$16,550.70

Cost Estimates and Financial Assurance

DEQ-Permit number: 3563007

Attn: Lyndsey Murray,

In accordance with OAC 252:515-27-34 cost estimates and financial assurance mechanisms must be adjusted annually and submitted to the DEQ for approval. Therefore, updated cost estimates must be submitted for approval and the financial assurance mechanism must be updated to reflect those approved costs.

Please see below:

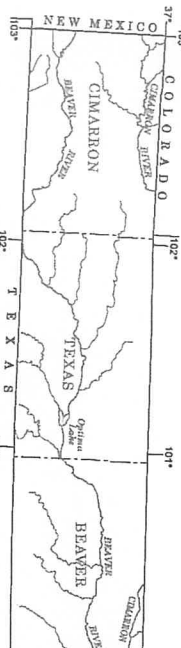
Inflation rate for 2024 at 3.64% and cost to clean up additional vats and equipment are estimated as follows per our post closure plan:

- 16 vats at \$20/hr x 3 persons x 1-days = \$240.00 clean up vats
- Additional three 30-yd dumpsters at \$600.00 each = \$1,800.00
- Estimated cost to remove/relocate additional pieces of equipment – four persons x \$20.00/hr x 1-day = \$640.00
- Transportation fees to ship equipment is approximately \$4,500.00
- Managerial fees at approximately 18% = \$1,119.60

Total cost of the 2024 financial assurance and closure cost estimates with inflation adjustment rate of 3.64% = \$15,969.41 + 581.29= \$16,550.70

Thank You,

Darrel Armer
Operating Manager
Oklahoma Green to Gold Recycling, LLC
479-651-0950



EXPLANATION
1 Scenic River; number corresponds to name in text
2 Salt Plain; number corresponds to name in text

Table 4. Major lakes and reservoirs in Oklahoma

Lake	Area	Drainage Area*	Capacity	Location
	Normal Pool (acres)	(square miles)	(acre-feet)	County/Countries
Eufaula	105,500	47,522	2,314,600	Mcintosh; Pushing; Haskell
Texas	98,000	39,719	2,643,300	Love; Marshall; Bryan; Johnston
Grand Lake O' the	46,500	10,298	1,672,000	Delaware; Ottawa; Mayes
Cherokee				
Robert S. Kerr	43,800	147,756	525,700	Haskell; Sequoyah; Le Flore
Oologah	29,460	4,339	553,400	Rogers; Nowata
Keystone	23,610	74,806	557,600	Ozage; Pawnee; Creek; Tulsa
Fort Gibson	19,900	12,492	365,200	Wagoner; Cherokee; Mayes
Kaw	17,040	46,530	428,600	Key; Osage
Broken Bow	14,200	754	918,070	McCurain
Sardis	13,610	275	274,330	Pushmataha; Latimer
Hugo	12,900	1,709	157,600	Cherokee
Tenkiller	11,690	1,610	654,100	Cherokee; Sequoyah
Webers Falls	10,900	97,033	170,100	Muskogee
Hudson	10,150	11,533	220,300	Mayes
Shadock	10,100	354	322,700	Ozage
Wauvika	10,100	562	203,100	Jefferson; Stephens; Cotton
Foss	8,880	1,496	256,220	Adair
Great Salt Plains	8,690	3,200	31,420	Blaine; Dewey
Canion	7,910	12,463	111,310	Le Flore
Wilder	7,333	993	62,390	

*Data from the Oklahoma Water Resources Board (1990).

RIVERS, STREAMS, AND LAKES OF OKLAHOMA

Kenneth S. Johnson and Kenneth V. Luza, Oklahoma Geological Survey

A stream is any body of running water, large or small, that flows under the influence of gravity toward lower elevations in a relatively narrow, clearly defined channel. Each major drainage system in Oklahoma consists of a principal river, with many smaller tributary rivers, streams, and creeks funneling water to the main course.

The condition and flow rates of Oklahoma streams are temporary in terms of geologic time. Stream positions shift as they cut deeper channels into their banks, while their tributaries erode nearby uplands. Major drainage systems of today were established during the Pleistocene (the last 1.6 million years). Streams flowed across Oklahoma for millions of years before finally carving out today's major drainage basins. The positions of earlier streams are marked now by alluvial deposits remaining as stream terraces, high above the flood plains of today's streams that are eroding deeper into underlying rocks.

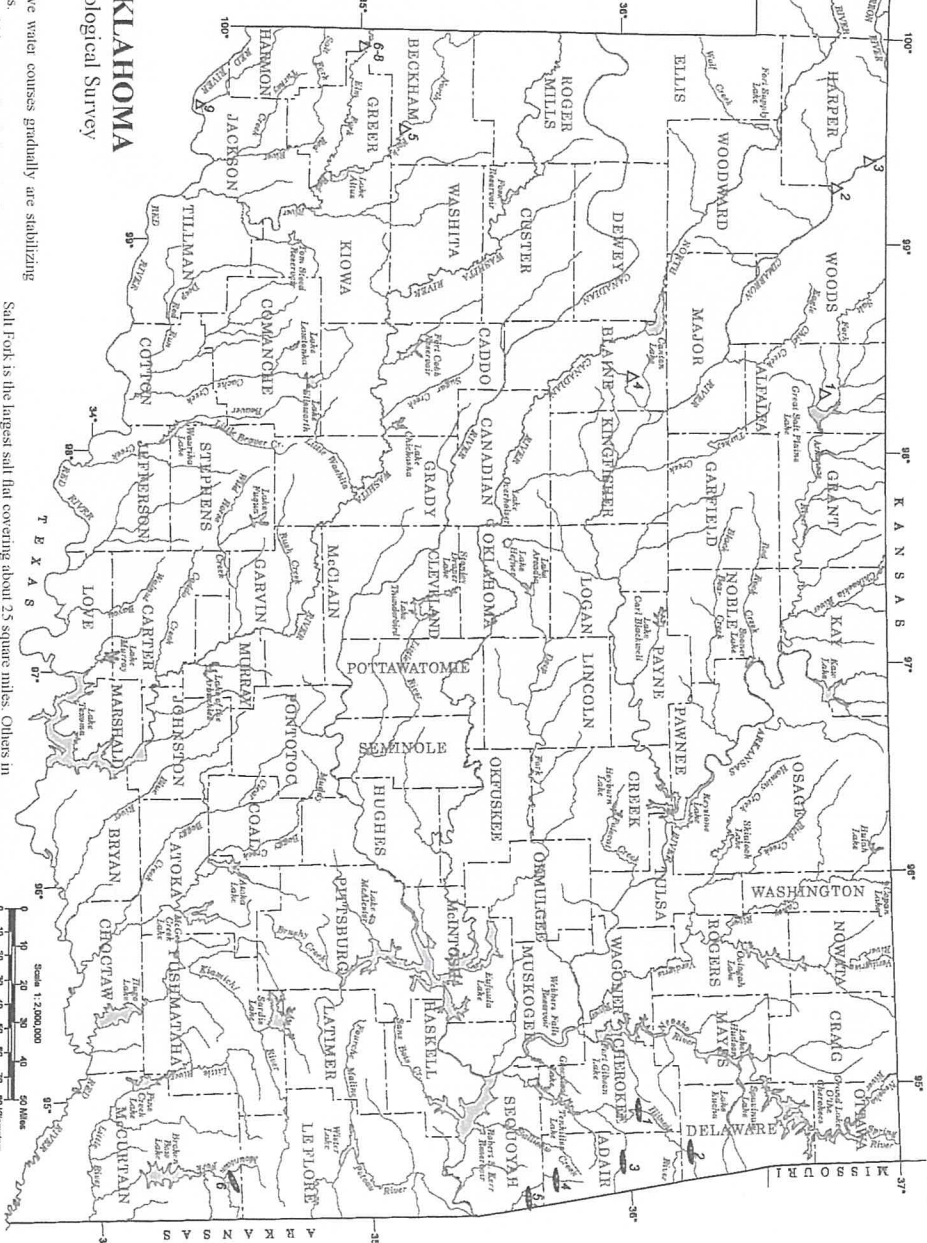
All major streams in Oklahoma have broad, sand-filled channels with active water courses occupying a small portion of the river bed or flood plain. These broad, sand-filled channels reflect large changes in discharge (floods) that occur from time to time. Many man-made dams on major streams and tributaries, however, have decreased flooding frequency and

magnitude. As a result, active water courses gradually are stabilizing within their broad stream beds.

All Oklahoma streams are within two major drainage basins: the Red River basin, and the Arkansas River basin (see page 14). The two rivers and their many tributaries flow into Oklahoma from neighboring states, while all surface water from Oklahoma flows into Arkansas, via the Red, Arkansas, and Little Rivers, and Lee Creek. Major rivers and tributaries flow mainly east and southeast across Oklahoma.

Six scenic rivers flow in eastern Oklahoma and several natural salt plants and saline rivers are present in the west. Five scenic rivers in the Arkansas River drainage are in Adair, Cherokee, Delaware, and Sequoyah Counties in the Ozark Plateau. They include parts of the Illinois River (1, see map), and Flint (2), Barton Fork (3), Little Lee (4), and Lee (5) Creeks. The upper part of Mountain Fork (6), which flows into Broken Bow Lake in the Ouachita Mountains in McCurtain County, is in the Red River drainage.

Natural salt plains occur along some rivers where natural brines seep to the surface. In the Arkansas River drainage, Great Salt Plains (1) on



Salt Fork is the largest salt flat covering about 25 square miles. Others in northwestern Oklahoma are Big Salt Plain (2) and Little Salt Plain (3) on the Cimarron River, and Ferguson Salt Plain (4) in Blaine County. Salt plants in the Red River drainage are Bogey Creek Salt Plain (5) on North Fork Red River, Kiser (6), Robinson (7), and Chaney (Salton) (8) Salt Plains on Elm Fork in north Harmon County, and Jackson County Salt Plain (9). Downstream in both drainage basins, fresh-water inflow dilutes saline river waters, making the water usable for municipalities, livestock, and industrial purposes before reaching Kystons Lake or Lake Texoma.

There are many lakes and reservoirs in Oklahoma; most are man-made, created by damming streams for flood control, water supply, recreation, fish, wildlife, and hydroelectric power. Lakes on the Arkansas and Verdigris Rivers aid in navigation along the McClellan-Kerr Navigation System. Major lakes are formed behind dams built by the U.S. Army Corps of Engineers, U.S. Bureau of Reclamation, and the Grand River Dam Authority. Various state and federal agencies, cities, and other entities own and operate large lakes. Farmers and landowners have built

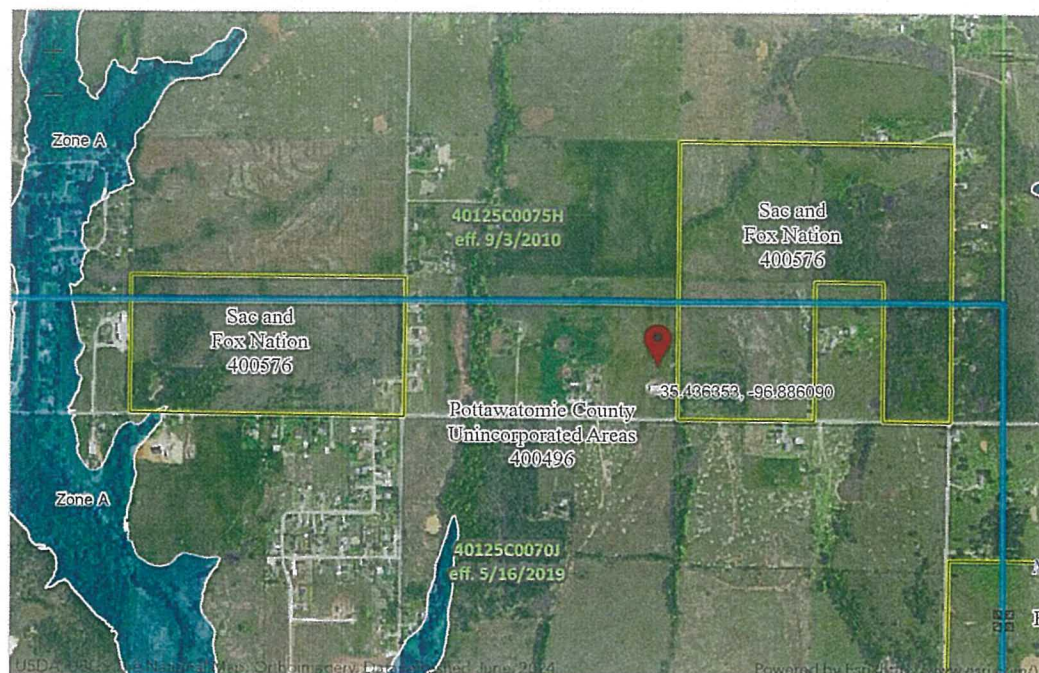
many smaller lakes and ponds. Table 4 lists the 20 Oklahoma lakes with the largest surface areas.

A series of oxbow and playa lakes are the only natural lakes in Oklahoma (Oklahoma Water Resources Board, 1990). Typically crescent-shaped, oxbow lakes occupy abandoned channels of meandering streams and occur mainly in flood plains of the Red, Arkansas, Washita, North Canadian, and Verdigris Rivers in central and eastern Oklahoma. Oklahoma has 67 oxbow lakes covering at least 10 acres each; the largest, near Red River in McCurtain County, covers 272 acres (Oklahoma Water Resources Board, 1990).

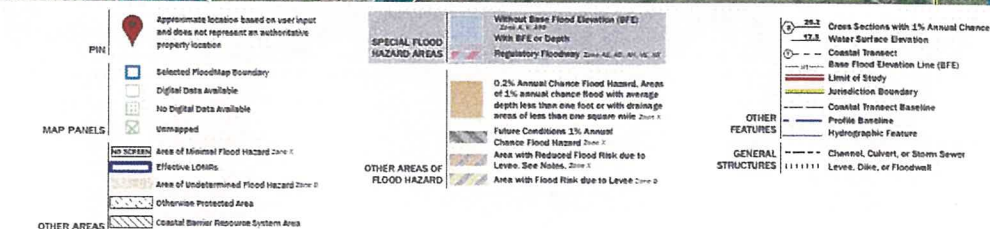
Playa lakes form in shallow, saucer-like depressions scattered across the semiarid High Plains in northwestern Oklahoma and the Panhandle. Playa lakes have no outflow, holding water during and after rainy seasons before evaporating, or losing water by infiltrating into the ground. Oklahoma has about 600 of these intermittent or ephemeral playa lakes, but only a few persist year-round (Oklahoma Water Resources Board, 1990).

Exhibit #13

Exhibit #14



Feedback



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DEPARTMENT OF WILDLIFE CONSERVATION

P.O. Box 53465

Oklahoma City, OK 73152

PH. (405) 521-3851

Darrel Armer
109109 S 4767 Rd.
Roland, OK 74954

October 22nd, 2019

Re: DEQ Permit / Environmental Review for Worm Farm in Pottawatomie County, OK

Dear Mr. Armer,

This letter is written in response to your correspondence of October 22nd, 2019 regarding the construction of a worm farm at the location of 43470 Moccasin Trail Road southeast of the town of Aydelotte in Pottawatomie County, Oklahoma.

This letter is provided to you as a courtesy of the Oklahoma Department of Wildlife Conservation (ODWC) as a form of technical assistance to help you site and plan your facility in such a way as to avoid or minimize potential negative impacts on wildlife resources. Please understand that we have not conducted an actual field investigation of your project area due to financial and personnel constraints; however we have endeavored to provide you with the most comprehensive information that we can based upon the information that we have on hand.

Ultimately it is the responsibility of the parties involved in the planning, design, construction, operation, and maintenance of the proposed facility to evaluate the impact of this project on wildlife resources, including threatened and endangered species, native habitats and the environment. Please be aware that because the entire project area is privately owned, it has not been the subject of an extensive wildlife survey or inventory.

As authorized by Title 800:25-19 of the Oklahoma Administrative Code, ODWC maintains authority over 3 state-listed threatened and endangered species; these include the Oklahoma Cave Crayfish (*Cambarus tartarus*), Longnose Darter (*Percina nasuta*), and Blackside Darter (*P. maculata*). All three of these species are aquatic and occur in watersheds greater than 100 miles from the project footprint. Due to the facility's distance from these areas, we have determined that the proposed development project will have no effect on any state-listed threatened or endangered species.

According to the U.S. Fish and Wildlife Service's Information for Planning and Consultation website (<https://ecos.fws.gov/ipac/>), Pottawatomie County is within the range of six (6) federally-listed threatened or endangered species. Four of these, including the Whooping Crane (*Grus americana*), Interior Least Tern (*Sterna antillarum*), Piping Plover (*Charadrius melodus*), and Red Knot (*Calidris canutus rufa*), are migratory birds that only nest or forage on or near wetlands, reservoirs, and riverine habitats. The Arkansas River Shiner (*Notropis girardi*) is a federally-threatened minnow that occurs in the Canadian River along the southern border of

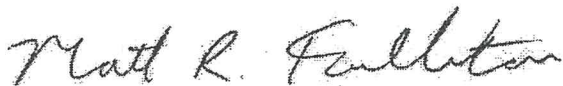
the county. Lastly, the American Burying Beetle (*Nicrophorus americanus*) is an insect that has the potential to occur in the eastern portion of Pottawatomie County.

Please note that federally-listed species are under the jurisdiction of the U.S. Fish and Wildlife Service; therefore, we recommend that you contact their Ecological Services Field Office in Tulsa for the most current records of species occurrences and further guidance. The contact information for that office is as follows:

U.S. Fish and Wildlife Service, Ecological Services
9014 East 21st Street
Tulsa, OK 74129
918-382-4500
Website: www.fws.gov/southwest/es/oklahoma

We appreciate the opportunity to review this project and submit comments. If you have any questions regarding this letter, please contact me at (580) 571-5820 or by email at matthew.fullerton@odwc.ok.gov.

Sincerely,



Matt Fullerton
Endangered Species Biologist

Ag Testing - Consulting

Account No. : 92840

Soil Analysis Report

COWAN, SHAWN
OKLAHOMA GREEN TO GOLD RECYCLING
PO BOX 1108
ROLAND OK 74954

Invoice No. : 1377829
Date Received : 08/05/2022
Date Reported : 08/09/2022

Results For : OKLAHOMA GREEN TO GOLD RECYCLING LLC
Location :

Lab No. : 81126	Depth : 0 - 8
ID :	
Total Nickel, ppm Ni	24.40
Total Arsenic, ppm As	3.172
Total Cadmium, ppm Cd	0.331
Total Lead, ppm Pb	3.10
Total Chromium, ppm Cr	20.47
Total Cobalt, ppm Co	3.32
Total Selenium, ppm Se	1.14

Topo Map



Gravel pit



1,640 - Ft

1/2 Mile

<https://maps.google.com/maps?ll=35.429514,-96.879281&z=13&hl=en-US&gl=US&mapclient=spv2>

Google

Exhibit # 17

R.

Exhibit #18



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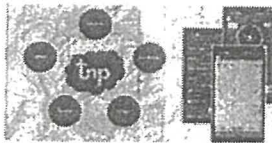
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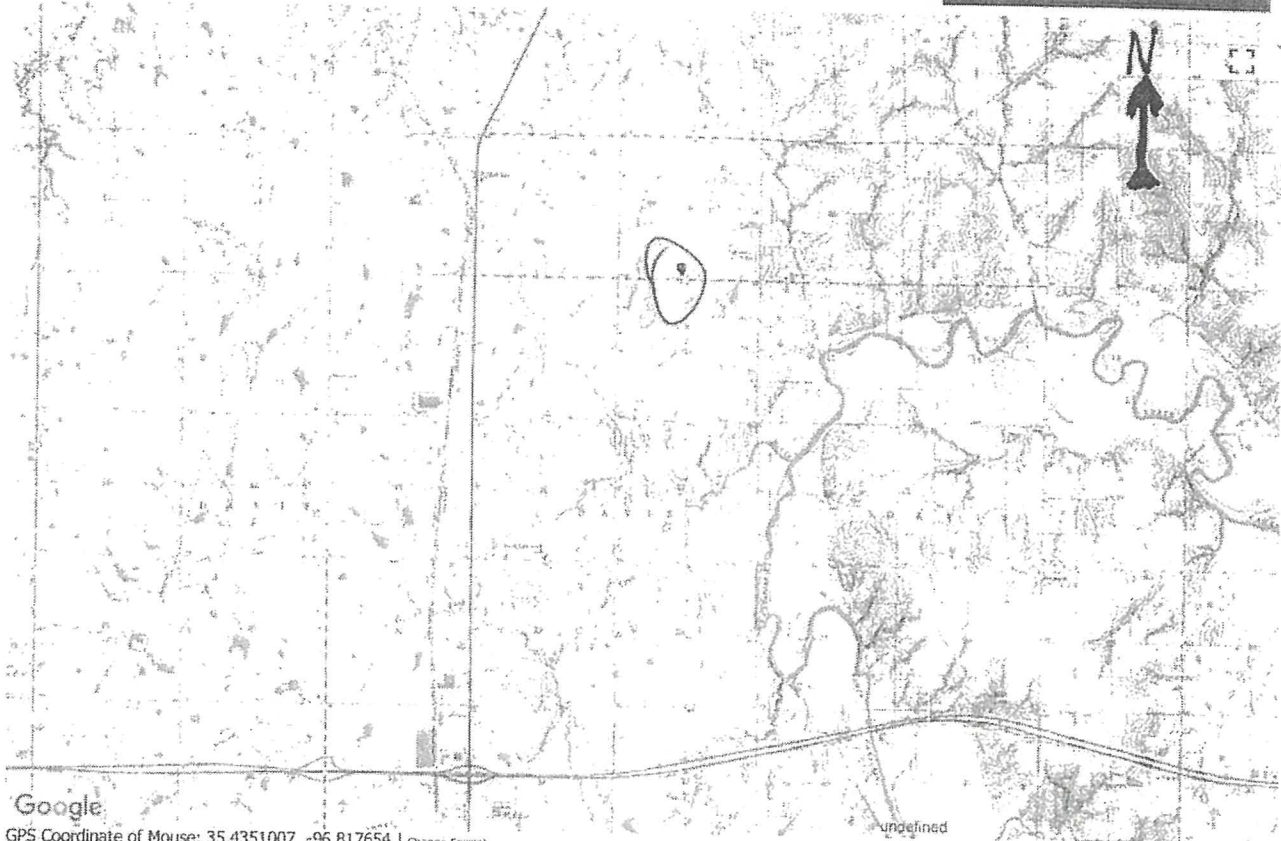


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October 3, 2019

Darrel Armer

RE: Worm Farm at 29909 Memorial Rd, McCloud, OK 74851

Dear Mr. Armer:

Your request for a wetland determination for the referenced project, as described in your email of October 3, 2019 has been reviewed using the Soil Survey of Pottawatomie County and the U.S. Fish and Wildlife Service National Wetland Inventory Mapper. Neither hydric soils nor wetlands are indicated on the soil survey map within your proposed project area, indicating that those areas most likely do not contain wetland ecosystems and that your project should not significantly impact wetland resources in the area. If you believe this determination to be inaccurate, an on-site investigation may be needed. This investigation needs to be coordinated with the U.S. Army Corps of Engineers, Regulatory Branch, in Tulsa. Their address and phone number is:

U.S. Army Corps of Engineers
Mr. Andy Commer
Chief of Regulatory Branch
2486 E 81st Street
Tulsa, OK 74137
918/669-7400

Based on our wetlands determination criteria there should be no significant impact on wetland resources in the area described. If you have any further questions or concerns, please contact me at 405/522-6908.

Sincerely,



Brooks Trammell
Wetlands Program Coordinator
Water Quality Division

cc Wetlands File