COMPOST FACILTY OPERATIONS PLAN

FOR

CTI ORGANICS RECYCLING & COMPOSTING FACILITY

24820 160th Street
EDDYVILLE, IOWA 52553

IDNR PERMIT # 90-SDP-10-97P-COM

PREPARED BY

CHAMNESS TECHNOLOGY, INC.
2255 LITTLE WALL LAKE ROAD
BLAIRSBURG, IOWA 50034

NOVEMBER 2016

I. COMPOST OPERATION OVERVIEW

The Eddyville Organics Recycling and Compost Facility is an outdoor, turned windrow facility. Feedstocks are normally accepted at the Facility Monday through Saturday from 7:00 AM to 4:00 PM, but may be accepted on Sundays or outside of regular business hours in order to accommodate individual client needs.

Composting is conducted on an 18 acre asphalt pad including feedstock storage, adjacent wood and compost storage and compost screening areas. A variety of equipment is utilized throughout the composting process including front-end loaders, compost turners, side dump trailers, tractors, mix wagons, conveyors and screens.

Finished compost is moved into the agricultural, horticultural, mine reclamation and consumer markets.

Chamness Technology also evaluates alternative composting techniques at this Facility. These alternative methods are evaluated on production scale pilot tests.

This Operating Plan will be revised in the event that full scale production operations are modified.

II. METHOD AND DURATION OF COMPOSTING

A. Feedstock Acceptance and Incorporation

The Eddyville Compost Facility accepts feedstocks and monitors them for contamination with extraneous materials such as metals, glass and plastics.

The Facility will accept and compost up to 115,000 combined tons of solid waste material annually. Only the solid wastes listed below, in addition to clean wood and yard wastes, will be accepted at this facility.

* Food waste
* Feed and feed ingredient waste
* Seed waste
* Paper products and paper sludges
* Manure and bedding
* poultry mortalities
* Industrial organic wastes and byproducts
* pH neutralizing agents
* Inorganic amendments for special purpose compost
* Wood/yard waste and agricultural crop residues
* Coal combustion byproducts

All feedstocks will be tested and pre-qualified prior to acceptance at the Facility. Under normal conditions, Chamness Technology will notify IDNR Field Office 6 at least 14 days prior to

accepting any new feedstocks not listed above. Under emergency conditions that require the acceptance of any new feedstocks earlier than 14 days after prequalification, Chamness Technology will notify IDNR Field Office 6 of the new feedstock materials at least 24 hours prior to accepting the feedstock materials.

Chamness Technology will maintain records of all feedstocks received at the Facility, including the date, quantity, description and source of feedstocks. These records are confidential in nature and will be available for review by IDNR Staff upon request at the Eddyville Facility.

Leachate characteristics of coal combustion by-products will be analyzed for the following heavy metals using the Toxicity Characteristics Leaching Procedure (TCLP, EPA Method 1311): arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver, when required. Analytical reports will be available for IDNR Staff review at the Facility and will also be submitted quarterly to the IDNR.

Feedstocks are taken at the Facility and placed into temporary storage depending upon the nature of the individual product.

1. All materials are mixed within 24 hours of receipt except the materials listed below. These materials may be stockpiled on site for an unlimited period of time and incorporated into the compost mix on an as needed basis to maintain proper C:N ratios.

Seed wastes	Feed wastes	Wood/yard wastes
Paper products	Paper sludges	Materials stored in tanks
Low nitrogen/low moisture materials		

2. Fly ash may be stored on site in a silo and mixed with low pH feedstocks on an as needed basis.

Feedstocks that have the potential to be blown around the Facility or become odorous prior to mixing may be covered with sawdust or ground wood.

All of the above listed materials will be accepted at varying frequencies and volumes. Some may arrive daily, while others will be received at irregular intervals. Regardless of the volume or frequency of delivery, all accepted feedstocks are stored and composted in accordance with this Operating Plan and best management practices.

Those materials placed into the daily mix will be done so using a compost calculator for determining appropriate carbon, nitrogen and moisture ratios/percentages to ensure that each compost row contains the necessary components for proper composting. The daily recipe calculator is kept in the Facility Office and is available for viewing during normal business hours.

Operational information, including compost recipes and composting techniques, are proprietary and confidential. Operational information shall not be removed from the Facility or

distributed to anyone by regulatory agency staff without the prior written permission of Chamness Technology.

B. Compost Production

1. Incoming Material

Incoming feedstocks are pre-qualified and stored at various locations on the Compost Pad depending upon the nature of the material. Those feedstocks identified as having no storage time limit are placed on the Compost Pad in pre-identified locations (except wood and yard waste materials which may be stored off of the pad).

2. Compost Row Building and Management

Feedstocks that have been mixed to meet the necessary C:N ratio are then placed in standard or adjacent windrows within fourteen days of acceptance. Under normal conditions windrows will be turned several times based upon windrow temperature and moisture, or turned when the average internal windrow temperature reaches 150 deg F. After PFRP is met, the windrows will be turned as needed to introduce oxygen into the windrows and address zonation. Windrow turning is documented on the temperature monitoring spreadsheet that is submitted to the IDNR quarterly and available at the Facility for viewing during normal business hours.

Windrows may be oriented in different directions depending upon screening operations and weather conditions. At all times, windrows will be placed to minimize ponding on the pad and maximize natural convection and oxygen flow.

3. Aeration of Compost

Maintaining aerobic conditions within the compost windrows is essential to proper composting and is achieved primarily through structure and convection. Oxygen content in windrows will vary over time and space within the windrow.

Aeration is primarily achieved through natural convection and mechanical turning using compost turners or front-end loaders. In the mixing process, bulking materials are added for their carbon content and physical structure. These materials help develop a solid matrix where connected pore spaces allow natural air exchange within the windrow. Turning will renew oxygen levels in the compost for a short period of time, but overall compost structure and thus natural convection are the key elements to maintaining proper air flow and thus aerobic conditions.

4. Pathogen Reduction, Temperature and Time Control

Once the compost mix is placed into a windrow the temperature is measured at least twice weekly until it has either met PFRP (Process to Further Reduce Pathogens) criteria of operating at a temperature equal to or greater than 131 degrees F as measured at the center of the windrow for at least fifteen (15) days or has been removed for disposal or recycling purposes. A minimum of five (5) turns is required during the high temperature period.

The composting process may require as little as six weeks. Windrows at the Facility may be kept "in process" longer. The age of each windrow is documented on the temperature and turning spreadsheet. Windrows that do not appear to have decomposed at a normal rate relative to other windrows may be turned more frequently or removed from the process for disposal or recycling back into new compost windrows.

5. Management of Odors

Odor may be generated from several locations within the Facility including the mixing area, active windrow area and storm water lagoons. Measures will be taken to minimize odor development and release from each area.

a. Windrows

Aerobic windrows will produce some odor. Odors from the windrows will be limited by using bulking agents in the initial compost mixture, maintaining proper moisture, proper bulk density and turning the windrows. Bulking agents that increase air exchange will be used in the mix.

b. Storm Water Containment Ponds

The storm water containment ponds may also be a source of odors at the Facility. Aeration of the containment ponds may be utilized as a means to minimize odor. Additionally, the areas around the storm water drains may also become odorous if saturated solids settle around them after rain events. Drains will be checked periodically for blockages and settled solids and cleaned as necessary to maintain proper function and minimize the potential for odor development.

c. Mixing Area

The receiving area and mixing area may be another potential source of odor. The development of odors from the receiving and mixing areas are minimized by properly managing the incoming materials. Mixing the materials, as noted in the Feedstock Acceptance and Incorporation section of this plan, outlines the procedures to be used to minimize odor from this area.

At times, liquids may drain from the feedstock stockpile. If ponding occurs around this area, the liquids will be soaked up with sawdust or other dry materials within 48 hours and incorporated into the daily mix for composting.

d. Curing and Storage Areas

The compost curing and storage areas may generate some odor from the stockpiled compost. Generally, the odors from these locations will be earthy in nature and non-offensive. However, any highly odorous sections may be remixed, if needed, to reintroduce oxygen and structure or be removed.

e. Good Housekeeping

General housekeeping practices will be employed around the scale, roadways, buildings and pad to further reduce odors and make the Facility more aesthetically pleasing. Good housekeeping and best management practices will include, but are not limited to, the following:

- Trash picked up around all areas of the site
- Well-kept and mowed grass areas
- Organized feedstock and supplemental storage areas
- Orderly storage of equipment
- Well maintained buildings and permanent structures
- Drive and parking areas free of debris and obstructions
- Aesthetic vegetation areas properly constructed and maintained to include trees along the road side of the property and landscaped area adjacent to the entrance.

f. Perimeter Maintenance

The perimeter of the Facility will be maintained with a vegetative buffer of trees and berms to create a physical barrier and visual screen. A line of odor masking socks may also be employed in this area if it is determined that the socks are effective in relieving objectionable odor issues.

6. Prevention and Management of Dust

During dry, windy days, dust may become a concern. Maintaining moist conditions in the windrows will minimize the creation of dust from the active compost area. Most dust will originate from the receiving and mixing areas on the south side of the pad. Materials that have the propensity to be blown away will be wetted down and/or covered with a heavier material, or mixed. During extremely windy conditions that may cause dust to blow beyond the Facility, activities such as compost turning, grinding and debagging will be avoided during these conditions.

7. Pest Control

Keeping production areas clean will minimize flies, rodents and other vectors. In the event that rodents, vectors or other pests become problematic, professional pest control services may be utilized to control populations.

8. Personal Safety

Safety of personnel on the Facility and throughout the composting process is paramount. There is nothing outlined in this Operating Plan or required during the daily operations of the Facility or composting process that should be construed as more important than maintaining the health and safety of the employees.

a. General Facility and Equipment Safety

In addition to Occupational Safety and Health Administration (OSHA) regulations, employee education and a good common-sense approach are important to injury prevention. Chamness Technology will provide appropriate training to employees on how to safely conduct composting operations and operate and service the equipment efficiently and safely. All equipment is required to operate in accordance with manufacturer's specifications. Instructions on operating and safety procedures are readily available to operators at all times.

During daily compost operation, only Equipment Operators and authorized personnel are allowed on the compost pad. Equipment Operators have to be aware of all of the activities and personnel whereabouts on the compost pad. If the visibility is obstructed by steam or dust, no one is allowed to pass through the area except the equipment involved in composting operations.

b. Personal Protection Equipment (PPE)

Chamness Technology will provide PPE to all employees and visitors who access the active operating areas on the compost site.

Managers shall ensure that: (1) required PPE is available; (2) PPE is being used by employees and visitors, and; (3) PPE is effective under current operating conditions.

Employees are responsible for: (1) inspecting PPE prior to its use; (2) wearing PPE at work and participate in safety training, and; (3) notifying their supervisor when new PPE is necessary or old PPE is ineffective.

Required PPE on site includes:

- Head protection – Hard hats.
- Eye protection – Safety glasses with side shield, goggles.
- Body protection – Company uniform/safety vest.
- Hand protection – Rubber/latex/leather/vinyl or nitrile gloves.
- Foot protection – Steel toed boots/rubber or polyethylene boots.
- Hearing protection – Ear plugs.
- Respirators – National Institute for Occupational Safety and Health (NIOSH)-approved disposable respirators (N-95, N-99 or N-100) (as required)

c. Operator Health

Although composting is not an inherently dangerous operation, it could involve dusty working conditions and pathogenic organisms. Dust can come from windrow turning, screening of compost and wood chipping. Operators should stay in sealed ventilated cabs with washable or disposable filters. Operators shall inspect the filters regularly to ensure their functionality. When working outside in a dusty area, employees shall wear disposable respirators.

Ponded water and leachate shall be drained properly to prevent slippery surface, growth of pathogens and vectors. Employees are responsible for using PPE under the instruction of the managers. Hands should be washed thoroughly before eating, drinking, smoking or using the bathroom. PPE should be cleaned, disinfected or discarded to prevent secondary exposure. Cuts, puncture wounds and abrasions must be covered or treated before entering working areas.

Employees should use a common sense to reduce exposure to feedstocks, such as touching, walking through mixing pad or standing in an area where feedstocks are ejected by equipment.

d. Prevention of infections

Very few pathogenic organisms, if any, exist in common compost feed stocks, such as yard waste, wood waste and food residues. Infectious diseases can only be carried by blood or animal body parts from industrial livestock processing. When such feedstocks are accepted for composting, generators shall notify Chamness Technology if there is any disease breakout in their facilities.

Procedures to prevent secondary exposures are:

- Trailers carrying industrial animal remains should be pressured washed to remove any excessive material at the end of the day.
- Heavy equipment involved in the mixing process should be rinsed off daily.
- Equipment should be cleaned before it is sent for maintenance, troubleshooting or repair.

- Employees engaged in pressure washing should wear proper PPE including a rain suit, rubber gloves, safety glasses and face shield.

9. Procedures for Equipment Breakdowns and Fires

In the event of a fire in the equipment, the operator should immediately shut off the machine, take a fire extinguisher and get out. The extinguisher should be used to put out the fire from the ground and the manager/supervisor on duty should be notified immediately. If the fire cannot be put out with the fire extinguisher or on-site watering equipment, the Fire Department should be called. Once the fire is extinguished, the equipment should be managed as would any other piece of out-of-service equipment.

If a fire develops in one of the buildings, employees should try to put it out with a fire extinguisher. Anyone not fighting the fire should immediately leave the building. If the fire cannot be extinguished quickly, the building should be completely evacuated and the Fire Department called. If possible, close all doors inside the building upon leaving.

If a fire develops in the compost, water should be used to douse the open flames. When there are no open flames, a front end loader will remove all material from the burning area to isolate the fire. The smoldering compost should be removed, spread over an open area of asphalt and doused. Once the fire is completely out, the material may be slowly added to the new compost mixtures.

If a fire develops in a wood pile, a front end loader should be used to remove any materials in the nearby vicinity and any nearby equipment should be moved away. The on-site watering equipment should be used to douse the fire. If it is a moderate to large size pile (larger than the loader) the Fire Department should be notified immediately. If the flames cannot be suppressed within ten minutes, call the Fire Department. After the fire appears to be out, slowly remove the charred wood to an isolated part of the asphalt, water and allow it to set until the smoldering is out.

The Facility's Emergency Response and Remedial Action Plan address these topics, and other emergency conditions, in greater detail.

10. Finished Product Marketing

Finished compost product will primarily be marketed for landscaping and agricultural use. Finished compost will also be marketed for use in gardens, athletic fields, golf courses, landfills, turf applications, nurseries, mine reclamation projects, and engineered specialty products. All products produced in Eddyville will be marketed in bulk and/or consumer quantities. Testing for compost quality is done on a quarterly basis with results submitted to the Iowa Department of Natural Resources.

11. Storm Water System Management and Pollution Prevention

The Facility has three storm water retention basins to collect storm water run-off from the composting area. The East Basin holds 1.9 million gallons, the Center Basin holds 4.3 million gallons and the West Basin holds 1.9 million gallons of effective volume. The total effective volume of the combined retention basins is 8.1 million gallons. Effective volume is considered to be the volume of water contained between the bottom two feet and the upper two feet of each basin. The East and West Basins have adequate effective volume for storing the run-off from a 24-hour 25-year storm event (3.1 million gallons from a 5.67 inch storm event on a 20 acre drainage area). The water level should not be less than two feet or within two feet of the top of the lagoon under normal operating conditions.

Chamness Technology does not have a permit to discharge water from these basins to waterways or streams. The Facility will utilize a variety of equipment to implement the following disposal methods for the management of storm water in accordance with its IDNR approved NPDES/Land Application Permit/Wastewater Permits (IDNR Permit # 90-00-1-05):

- Application to windrows
- Land application via center pivot or traveling irrigation gun
- Land application via injection or splash plate
- Municipal waste water treatment plant

The following are storm water management tasks:

- Daily recording of lagoon levels or after rainfall events of more than one inch (when site is staffed)
- Weekly visual checks of lagoon levels
- Quarterly inspection of drain lines and lagoon banks
- Ongoing monitoring and recording of water being applied to each parcel
- Annual monitoring of lagoon sludge depths
- Notification within 6 hours of any overflow to IDNR Field Office #6

The Facility's Storm Water Pollution Prevention Plan is attached as an Addendum to this Operating Plan. The Storm Water Pollution Prevention Plan outlines the steps that should be taken in the event of rising pond levels during heavy precipitation.

If sludge accumulates to a depth of greater than three feet in the bottom of the storm water retention lagoons, the lagoons will be dewatered and the sludge will be removed from the lagoons. The sludge may be returned to the composting process or land applied in accordance with IDNR permits and regulations.

12. Compost Monitoring, Sampling and Analysis

Compost feedstocks arrive at the Facility daily. These feedstocks are sampled and analyzed prior to initial acceptance at the Facility and periodically thereafter. Using the most recent feedstock analyses, the carbon to nitrogen ratios and moisture content are used to determine the appropriate amount of carbon, nitrogen or moisture to be added to the mix.

The materials are mixed and placed into windrows. Each windrow has an associated windrow number. Windrows will be tracked throughout the composting process via the windrow number.

Moisture monitoring will be done on an as needed basis to determine if water needs to be added to the windrows. Temperature monitoring will be done twice weekly on each windrow until PFRP is met using either an infrared monitor or bi-metallic thermometer. Temperature monitoring data will be utilized to help track the composting process and specifically PFRP. Records of both temperature and turning are kept on site.

A quarterly sample of finished compost (compost that as met PFRP) will be analyzed for a variety of parameters including pH, moisture, nutrients (N, P and K) and metals (as, Cd, Pb and Ni). If the sample contains levels of heavy metals that exceed the concentration limits outlined in IAC 567 Chapter 105.9(4)c.(2), three additional samples of compost will be collected and analyzed. If these analyses also indicate concentrations of heavy metals that exceed the limits, the material will be set aside in the storage area and diluted with compost that meets the heavy metals standards. Samples from successive weekly lots of finished compost will be analyzed for heavy metals. The monitoring will continue on additional lots of compost until three consecutive samples are found to be in compliance with the referenced metals limitations.

2255 Little Wall Lake Road • Blairsburg, IA 50034 • 515-325-6133 • 515-325-6134 (f) • www.chamnesstechnology.com

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CHAMNESS TECHNOLOGY, INC.®

Con 12-1-1
Doc # 87854

Via Hand Delivery

December 1, 2016

Iowa Department of Natural Resources
Land Quality Bureau – Solid Waste Division
Attn: Amy Buckendahl
502 East 9th Street
Des Moines, Iowa 50319-0034

Re: Chamness Technology Solid Waste Composting Facility Permit # 90-SDP-10-97-COM Renewal

Ms. Buckendahl –

Enclosed is our application for renewal of our Solid Waste Composting Facility Permit due to expire on March 1, 2017.

All necessary documents are included in the Permit Renewal Application except a current copy of the Financial Assurance instrument (an Irrevocable Letter of Credit) which is in the process of being updated and will be available early the week of December 5, 2016. A copy of this updated Financial Assurance instrument will be provided under separate cover for this application as soon as it is received.

Please contact me with any questions or concerns regarding this renewal application. I can be reached at via e-mail at doug@chamnesstechnology.com or by phone at 515-325-6133 (office) or 515-450-0773 (cell).

Sincerely,

Doug MacCrea
Acting Compliance Manager

Enclosure: IDNR Form 50A w/supporting docs

☐ New Permit ☒ Permit Renewal # 90 -SDP- 97 -P -COM ☐ Permit Amendment

IOWA DEPARTMENT OF NATURAL RESOURCES

Compost Facility

PERMIT APPLICATION FORM 50A

Application for a solid waste compost facility must be accompanied by the plans, specifications and additional information required by the applicable solid waste rules under Iowa Administrative Code 567 Chapter 105.

Send completed applications with attached information to:

Iowa Department of Natural Resources
Land Quality Bureau
Solid Waste Section
502 East Ninth Street
Des Moines, IA 50319-0034

For questions concerning this application please contact the Department at (515) 281-8150.

SECTION 1. FACILITY CONTACT INFORMATION

Facility Name/Address: Chamness Technology, Inc. Eddyville Organics Recycling and Compost Facility 24820 160th Street Eddyville, Iowa 52553 Phone #: 641-969-5702 Fax #: 641-969-5802	**Site Legal Description:** Wapello County Columbia-Cass Township Section 19 N ¼ of NW ¼ of ___ ¼ Section 19 Township 73N Range 15 E/W County Wapello
Name/Address of Responsible Official: Gary M. Chamness Chamness Technology, Inc. 2255 Little Wall Lake Road Blairsburg, Iowa 50034 Phone #: 515-325-6133 Fax #: 515-325-6134	**Facility Owner/Address:** Gary M. Chamness Chamness Technology, Inc. 2255 Little Wall Lake Road Blairsburg, Iowa 50034 Phone #: 515-325-6133 Fax #: 515-325-6134
Name of Facility Operator: Jerry Gunnell Phone #: 641-969-5702 Fax #: 641-969-5802	**Name/Address of Design Engineer (P.E.), if any:** License #: Phone #: Fax #:

SECTION 2. SITE INFORMATION

This facility is part of the following solid waste comprehensive planning area:

Planning Area: Ottumwa-Wapello County Solid Waste Commission

Date of Last Approved Plan: 10/22/2014

Days and hours of operation of the facility: **Monday - Friday 7:30 AM - 4:00 PM and by appointment outside of regular business hours.**	**Open to the public?** ☒ Yes ☐ No

Type and expected weight (tons) of solid waste feedstocks to be handled per day, week and year at the facility:
Type:
Please see attached Operating Plan
per day
per week
per year

SECTION 3. PERMIT APPLICATION CHECKLIST

Checking the appropriate boxes below certifies that the documents submitted in conjunction with this application form are complete and in compliance with the applicable chapters of the Iowa Administrative Code. While some of the documents below may have been submitted previously, updated copies of each is required to be provided with each permit renewal application. One (1) copy of each document shall be submitted. If an application is found by the department to be incomplete, it may be denied and returned to the applicant.

Required Documents			Attached
Section A.	**Executive Summary** *(permit renewals only)* • Summary of modifications, if any, to the facility that occurred during the current permit cycle. • Summary of each special provision of the current permit to determine if it is to remain the same, be revised or be removed. • Summary of each permit amendment, if any, that occurred during the current permit cycle to determine if it shall be included with the renewed permit, be revised or be removed. • Provide documentation and certification as required for new permit amendment requests and new variance requests from Iowa Administrative Code, if any.		☒
Section B.	Site Map or Aerial Photograph	IAC 567 105.8(1)	☒
Section C.	Organizational Chart	IAC 567 102.12(5)	☒
Section D.	Operator Certification	IAC 567 105.10	☒
Section E.	Site Design Plan	IAC 567 105.8(2)	☒
Section F.	Site Operation Plan	IAC 567 105.3 IAC 567 105.8(3) IAC 567 105.9	☒
Section G.	Emergency Response and Remedial Action Plan	IAC 567 102.14	☒
Section H.	Site Closure Plan	IAC 567 105.13	☒
Section I.	Proof of Financial Assurance and Closure Cost Estimate	IAC 567 105.14	☒

SECTION 4. APPLICANT CERTIFICATION

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I further certify that the construction and operation of the above described facility will be in accordance with the plans, specifications, reports and related communications accepted by the Iowa Department of Natural Resources and on file in its office; and in accordance with conditions imposed in the permit issued by the Iowa Department of Natural Resources.

Signature: _____ Date: 11/28/2016

Printed Name: GARY M. CHAMNESS Title: PRESIDENT/CEO

CHAMNESS TECHNOLOGY, INC.

COMPOSTING PERMIT # 90-SDP-10-97P-COM

2016 Permit Renewal
Executive Summary

Prepared By:
CHAMNESS TECHNOLOGY, INC.
2255 LITTLE WALL LAKE ROAD
BLAIRSBURG, IA 50034

Introduction

Chamness Technology owns and operates the Eddyville Organics Recycling and Composting Facility located at 24820 160th Street in Eddyville, Iowa. The Facility has been in continuous Operation since 1999 and the current Facility Operating Permit expires on March 1, 2017.

Special Provision Review

a) Chamness Technology requests that the Special Provision 1, listed in the current permit, remain in effect and be updated to reflect the date of the revised/updated Operations Plan to be November 2016.

b) We request that Special Provision 2, be modified to read as follows:

"The permit holder shall operate the facility in accordance with IAC Chapter 105.4(7) (455B, 455D), modified as follows: that ponding of water on the compost pad will be corrected within 72 hours after the end of the most recent precipitation event."

This Special Provision was approved by the Department in the Permit issued by the Department on March 1, 2014 with the timeframe listed as "within 48 hours after a precipitation event." We believe that adjusting this Special Provision timeframe to 72 hours realistically permits facility personnel to remove any standing water from the pad in a reasonable period of time and will not create any potential odors.

Chamness Technology, Inc.
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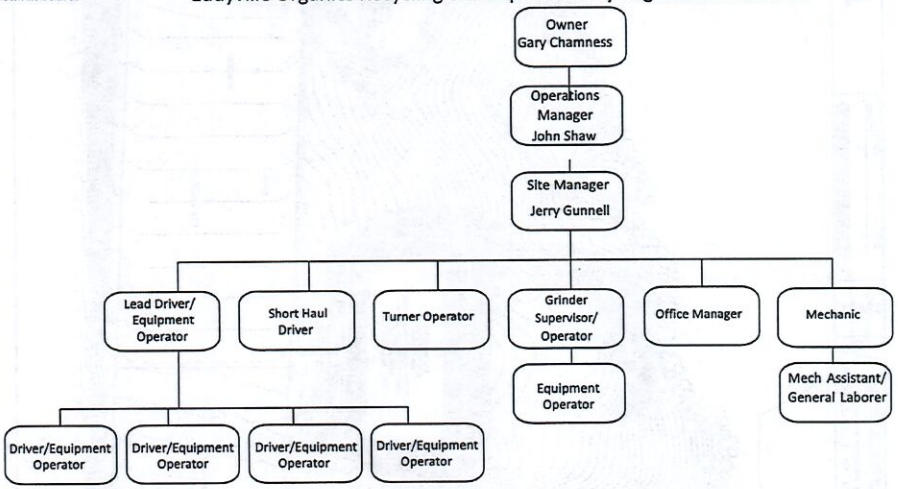
Eddyville Organics Recycling & Compost Facility Organizational Chart



STATE OF IOWA

OPERATOR CERTIFICATION

CERTIFICATE EXPIRES 6/30/2016.
WHEN THIS CERTIFICATE EXPIRES A CURRENT RENEWAL CERTIFICATE MUST BE ATTACHED.

IOWA DEPARTMENT OF NATURAL RESOURCES

RENEWAL CERTIFICATE

EXPIRES JUNE 30, 2019

JERRY GUNNEL
Compost Facility Operator
CERTIFICATE #CF100

JERRY GUNNEL IS QUALIFIED IN ACCORDANCE WITH STATE LAW AS A COMPOST FACILITY OPERATOR.

CERTIFICATE #CF100

GIVEN UNDER THE HANDS OF THE
IOWA DEPARTMENT OF NATURAL RESOURCES
ON 07/14/2015

FOR THE DIRECTOR:

WILLIAM A. EHM, DIVISION ADMINISTRATOR

THIS CERTIFICATE REMAINS THE PROPERTY OF THE DEPARTMENT