Outlook

[EXTERNAL] Oklahoma Green to Gold Tier III NOD response

From service@oklahomagreentogold.com service@oklahomagreentogold.com <service@oklahomagreentogold.com>

Date Sat 7/19/2025 8:08 PM

To Jeff Biddick <Jeff.Biddick@deq.ok.gov>

22 attachments (3 MB)

0. Tier III Application.pdf; 1. Exhibit #1.pdf; 2. Exhibit #2.pdf; 3. Exhibit #3.pdf; 4. Exhibit #4.pdf; 5. Exhibit #5.pdf; 6. Exhibit #6.pdf; 7. Exhibit #7.pdf; 8. Exhibit #8.pdf; 9. Exhibit #9.pdf; 10. Exhibit #10.pdf; 11. Exhibit #11.pdf; 12. Exhibit #12.pdf; 13. Exhibit #13.pdf; 14. Exhibit #14.pdf; 15. Exhibit #15.pdf; 16. Exhibit #16.pdf; 17. Exhibit #17.pdf; 18. Exhibit #18.pdf; 19. Exhibit #19.pdf; 20. Exhibit #20.pdf; 21. Exhibit #21.pdf;

1. **Right of access:** Ownership of property letter has been attached. Please see Exhibit #20
2. **Endangered or threatened species:** Both letters completed and attached. Please see Exhibit #15
3. **Wellhead protection areas:** Wellhead protection area map has been attached. Please see Exhibit #21
4. **Waste types:** Please see updates to waste received
5. **Non-compostable and other waste:** Added to waste received SOP. Please see Exhibit #10
6. **DEQ contact:** Updated with Hillary Young's contact information.
7. **Legal description:** All legal descriptions have been corrected to reflect proper written text and abbreviated text.
8. **Testing:** Section 4.1 updated to reflect a testing frequency for finished compost to annually.
9. **Latitude and longitude**: Exhibit #1 updated with correct coordinates.
10. **Floor plan**: Worm vats have been removed from the site plan in Exhibit #4.
11. **Operations plan**: Revised to show that feedstock will be weighed directly.
12. **Curing**: Revised to show that ALL compost must cure for a minimum of two weeks before distribution and use.
13. **Processing**: Revised to show that Oklahoma Green to Gold can store dry plant material for up to six months with the condition that the material is shredded within the first 24 hours of receipt.
14. **Closure plan**: Updated with the 2025 closure plan. Please see Exhibit # 11.
15. **Signage**: Oklahoma Green to Gold will ensure that our signage will be updated to reflect that we will be a Class III Composting facility upon permit approval.

APPLICATION TO MODIFY A SOLID WASTE DISPOSAL FACILITY PERMIT

Date: 1/31/2025 County: Pottawatomie

Send to:

Solid Waste Permitting Unit
Land Protection Division
Dept. of Environmental Quality
707 N. Robinson (PO Box 1677)
Oklahoma City, OK
73101-1677

FOR DEQ USE

DEQ Log No. _____
No. Copies _____

Date Received: _____

Wanda Armer proposes to modify the permit of
(Applicant's Name)
the Oklahoma Green to Gold Recycling located at Section 9-T11N-R4E, of Pottawatomie County
(Facility Name) *(Exact legal description:*
The East half of the East half of the Southern Quarter (E/2 E/2 SE/4) in Section 9.
metes & bounds, platted lot, or land survey. Append extra sheets if necessary)

in Pottawatomie County, Oklahoma. We hereby make application for a modification of existing permit number 3563007 as required by the **Oklahoma Solid Waste Management Act** and the Rules pursuant thereto.

Remarks & brief description of proposed modification:
Requesting an increase to greater than 100 tons/year of solid waste.
Requesting to add on to our existing facility.
Requesting to expand our permit boundary

Applicant or Authorized Agent:
Wanda Sue Armer
Signature
Wanda Sue Armer
Typed Name
Address: 11432 S 4770 Rd
City: Muldrow State: OK

Date signed: _____
Phone: 479-651-3370

Preparing Engineer:
P. Doug Harwell
Signature
P. Doug Harwell
Typed Name
Address: 1955 South Caddo Street
City: Muldrow State: OK

Date signed: 1/31/25
Phone: 918-427-0777

Facility Address (if any): 43470 Moccasin Trail Rd
Meeker, OK 74855

STATE OF OKLAHOMA REGISTERED PROFESSIONAL ENGINEER PAUL DOUGLAS HARWELL 11025

1-31-25

DEQ USE ONLY

VERIFICATION[1]

STATE OF OKLAHOMA)
) ss
COUNTY OF Pottawatomie)

Wanda Armer, of lawful age, being first duly sworn, upon oath state that I have read the foregoing APPLICATION TO MODIFY A SOLID WASTE DISPOSAL FACILITY PERMIT, that I am familiar with the matters set forth therein, and that the same are true to the best of my information and belief.

Wanda Sue Armer
Applicant

Subscribed and sworn to before me this 3rd day of January, 2025.

by Wanda Sue Armer (Applicant or legal representative).

Notary Public

My commission expires:

November 19th 2026

KIARA LINNET HARVELL
Notary Public, State of Oklahoma
Commission # 18011700
My Commission Expires 11-19-2026

REGISTERED PROFESSIONAL ENGINEER
PAUL DOUGLAS HARVELL
11025
OKLAHOMA

1-3-25

[1] This Verification is required for a Tier III modification application.

Aesthetic Enhancement: Oklahoma Administration Code 252:515-3-37

Oklahoma Green to Gold Recycling plans to erect a greenhouse to store finished compost to protect from weather elements. This green house will be closed on each end with opening large enough for fork lift access. The green house will be located just north of the permitted boundary and approximately 50'-75' from the west property line. The green house will provide aesthetics enhancement from compost sitting in the open.

Smell and dust from the compost processing and storing is low to none, therefore, shouldn't be any concerns from neighbors.

Oklahoma Green to Gold Recycling plans to plant shrubs or trees in the area of the greenhouse between green house and west property line fencing.

HarChem

H_2O

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

TABLE OF CONTENTS

Legal Descriptions

"The East half of east half of the Southeast Quarter of the Southwest Quarter (E/2 E/2 SE/4 SW/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 Southeast Quarter of the Southwest Quarter (E/2 E/2 SE/4 SW/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, LLC.

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 food products, medical marijuana waste plants, stalks, stems, fan leaves, flower, trim, and root balls. Incidental wastes include household waste, gloves, and OMMA tags from the originating facility.

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: Hillary Young
DEQ Land Protection Division P.O. Box 1677 Oklahoma City, OK 73101-1611
Phone #: (405) 702-5100
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 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 Section 9-T11N-R4E, Of Pottawatomie County

The East half of the East Half of the Southeast Quarter of the Southwest Quarter (E/2 E/2 SE/4 SW/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 food products, medical marijuana waste plants, stalks, stems, fan leaves, flower, trim, and root balls. Incidental wastes include household waste, gloves, and OMMA tags from the originating facility.

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 staged in designated areas for either: Staging and prepping for compost production or Incinerating.
    - 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. Composted materials include medical marijuana waste food products, medical marijuana waste plants, stalks, stems, fan leaves, flower, trim, and root balls.
    - All MMW must be processed and disposed of within 6 months.
    - Non-compostable and other waste. Plastics, glass, gloves, OMMA tags, and household waste mixed in incidentally will be all be separated and sent to the landfill.
- 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 and electronically filed.
- Once scanned 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 compositing 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 prosed 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.
  See Exhibit #13

- 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 mils 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 prosed 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. 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 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 1 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 $1x10^{-5}$ 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 using "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 and 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 must 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 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 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 OAC 252:151-43-111, testing is completed annually 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 and maintain in the operating records any location restriction demonstrations, daily operational records, inspection records, monthly and annual reports, documentation and analyses demonstrating the nonhazardous classification of wastes received, monitoring or testing data required, closure plans, and any cost estimates and financial assurance until DEQ 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 sire closure or DEQ approves the facility approves 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 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**********

Exibit 1
GPS Plan

Oklahome Green To Gold
OMMA Waste Facility

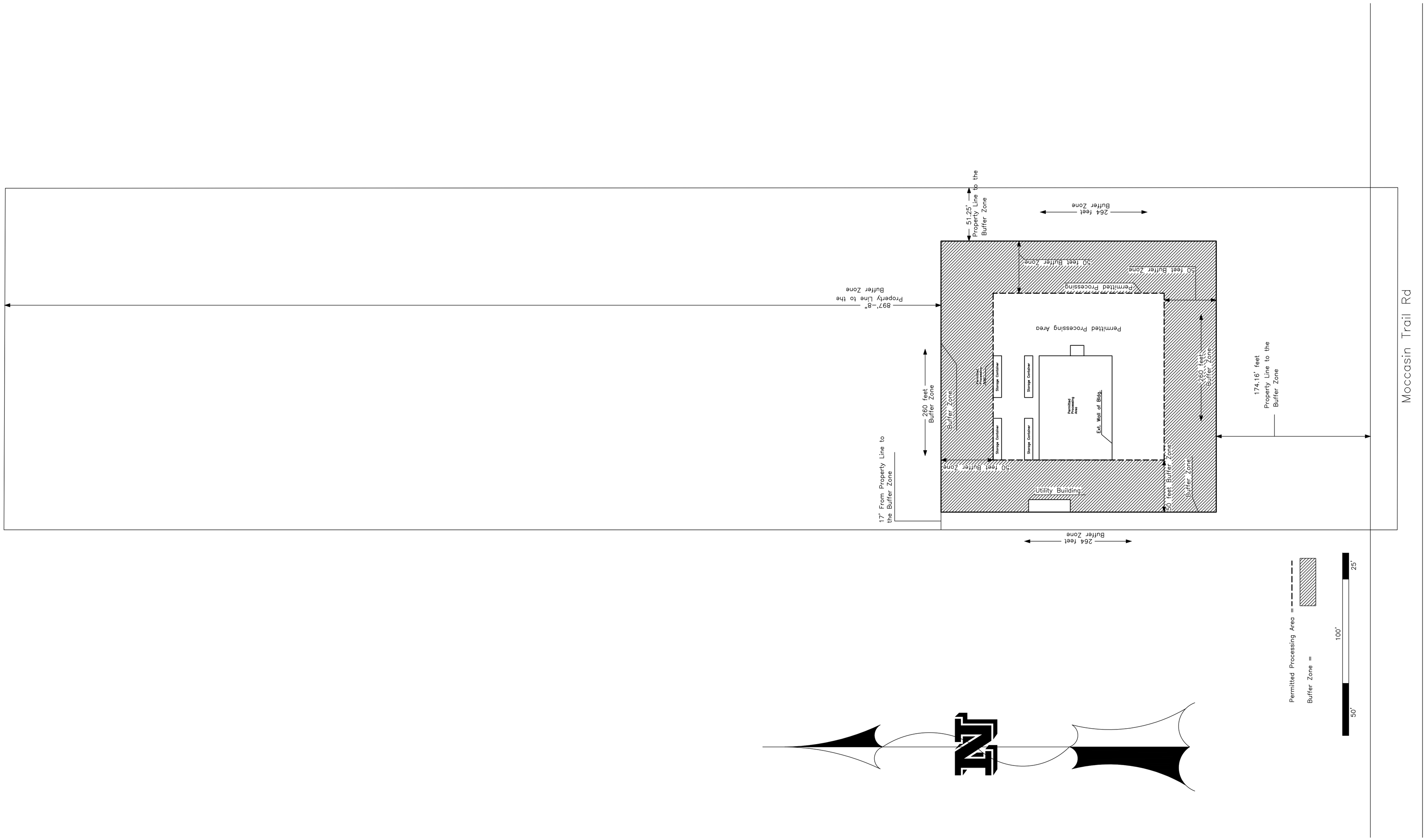
43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

Total SQ.FT. 7130
Floor Plan

Exibit 2
Set Back & Buffer Zone
& Permitted Processing Area

Oklahome Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



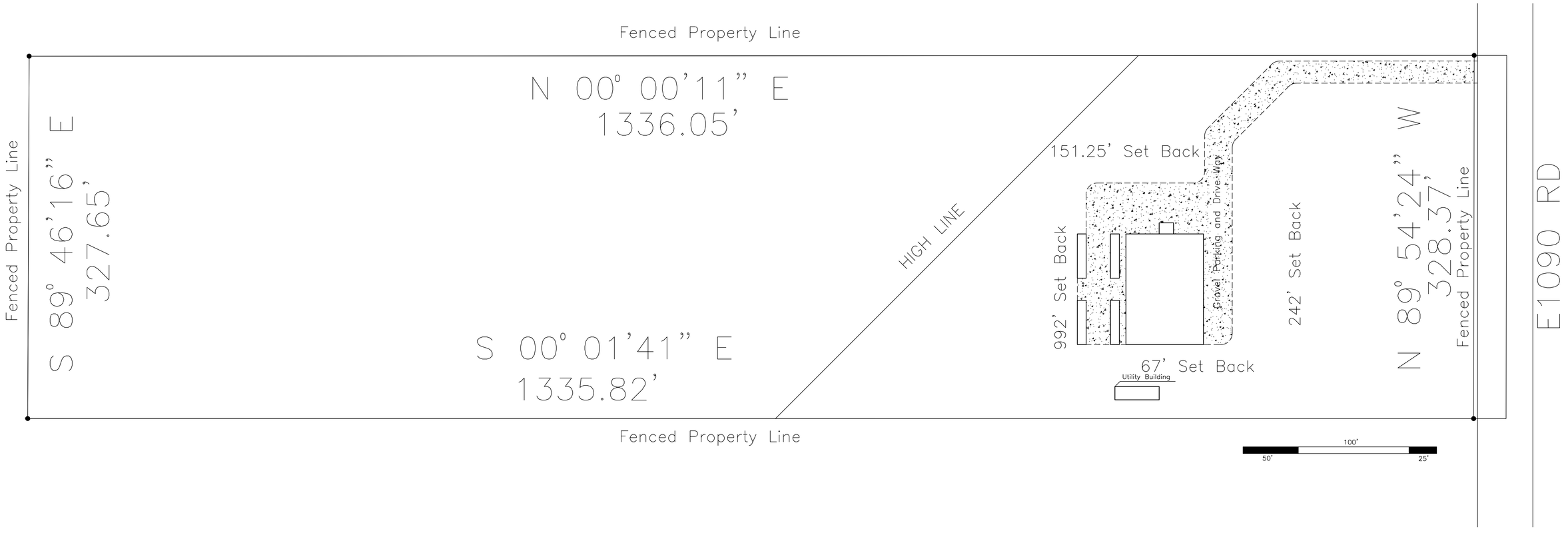
Total SQ.FT. 7130
Floor Plan

Exibit 3
Legal Decription & Set Backs & High Line and Fences

The East1/2 of the East1/2 of the Southeast1/4 of the Southwest1/4 (E/2 E/2 SE/4 SW/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.

Oklahome Green To Gold
OMMA Waste Facility

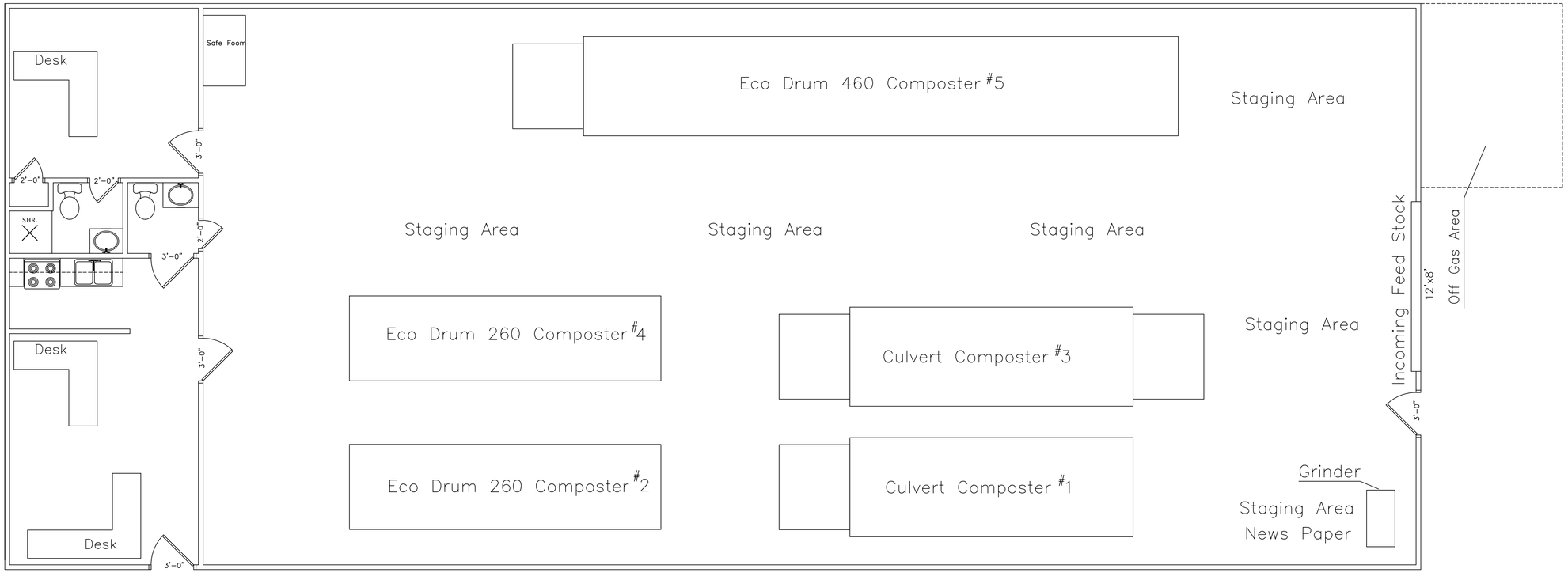
43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



Exibit 4
Processing Floor Plan

Oklahome Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

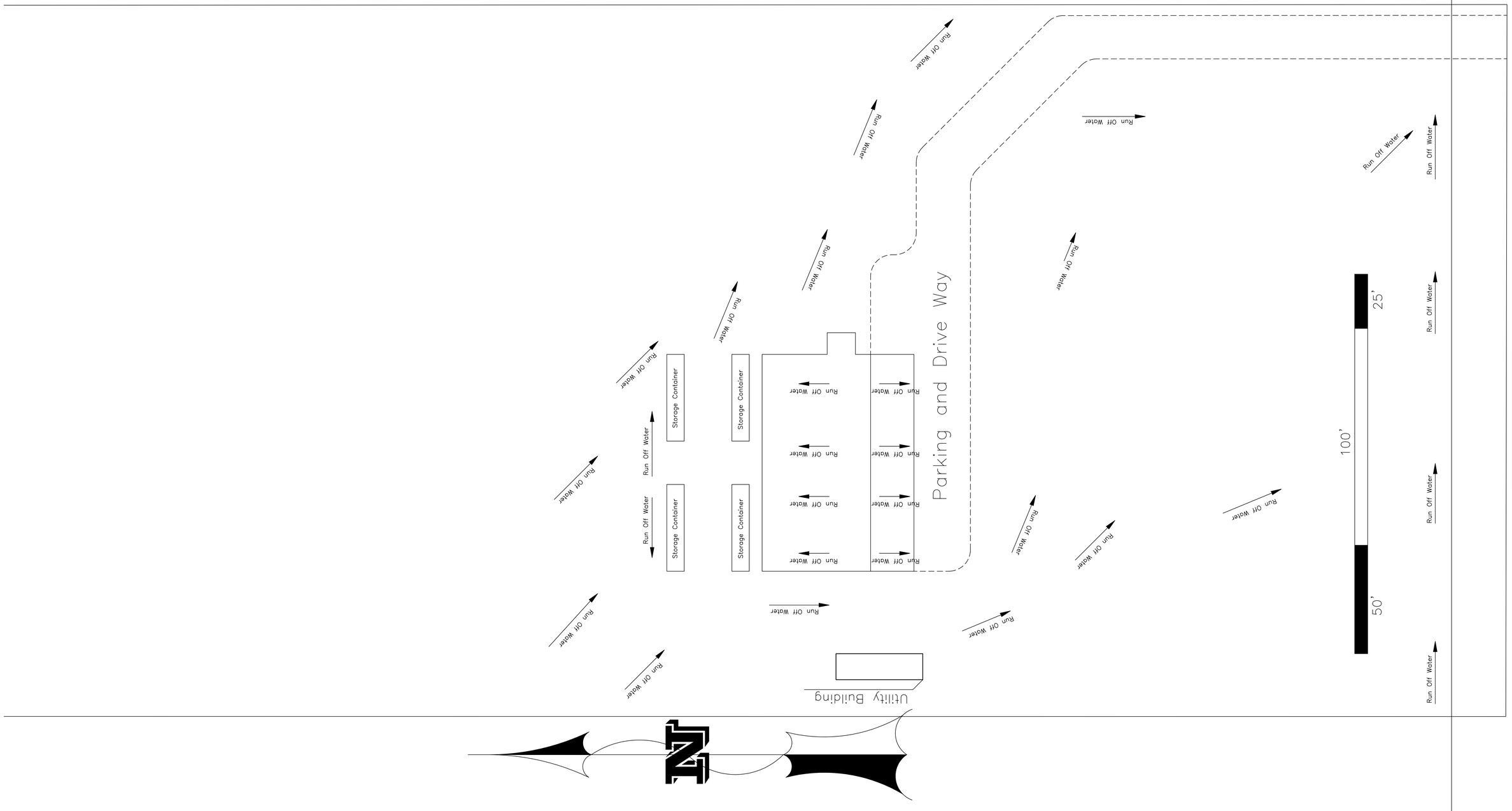


Scale: 1/8"=1'
Page 6 of 8
Total SQ.FT. 7130
Floor Plan

Exibit 5
Water Run Off Plan

Oklahome Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

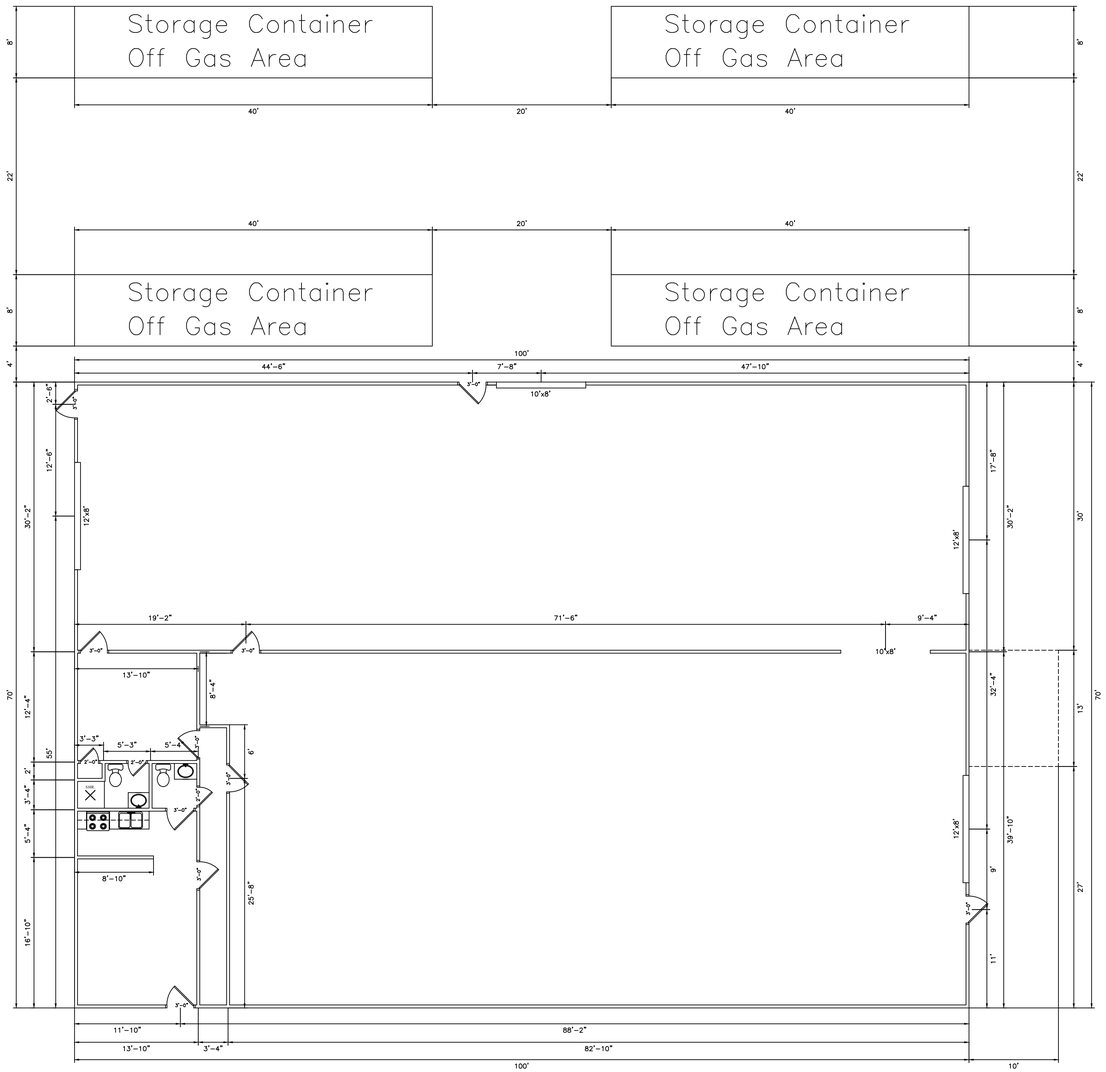


Total SQ.FT. 7130
Floor Plan

Exibit 6
Floor Plan

Oklahome Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855

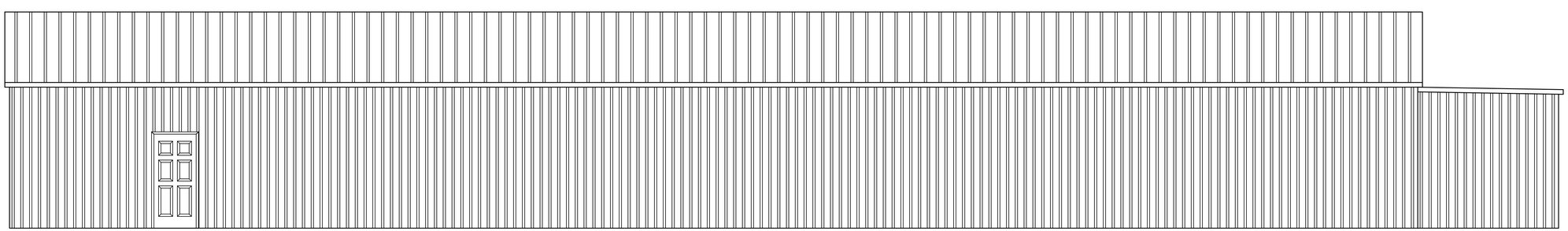


Scale: 1/8"=1'
Page 6 of 8
Total SQ.FT. 7130
Floor Plan

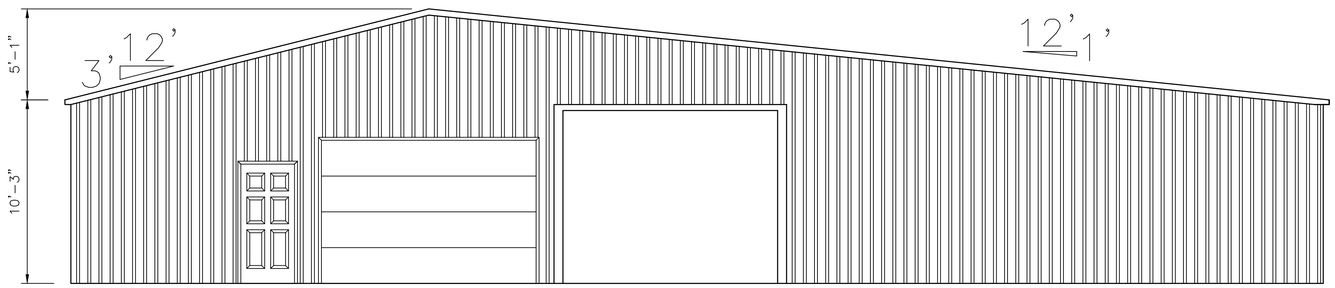
Exibit 7
Elevations

Oklahome Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



SOUTH ELEVATION



EAST ELEVATION

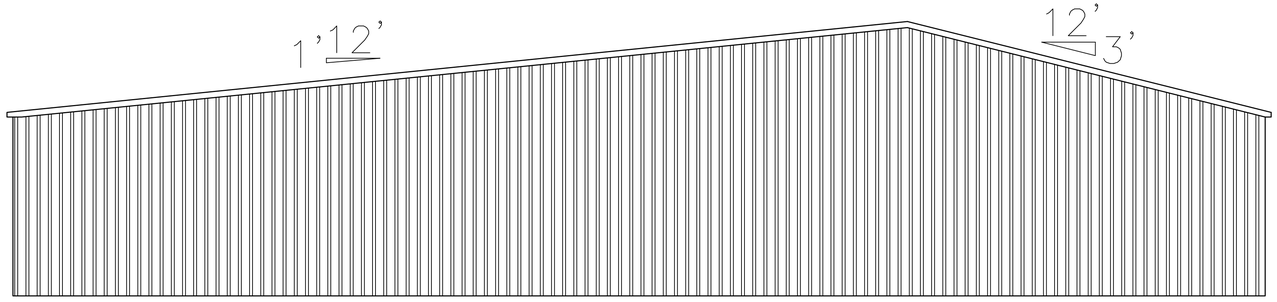
Scale: 1/4"=1'

Total SQ.FT. 7130
Floor Plan

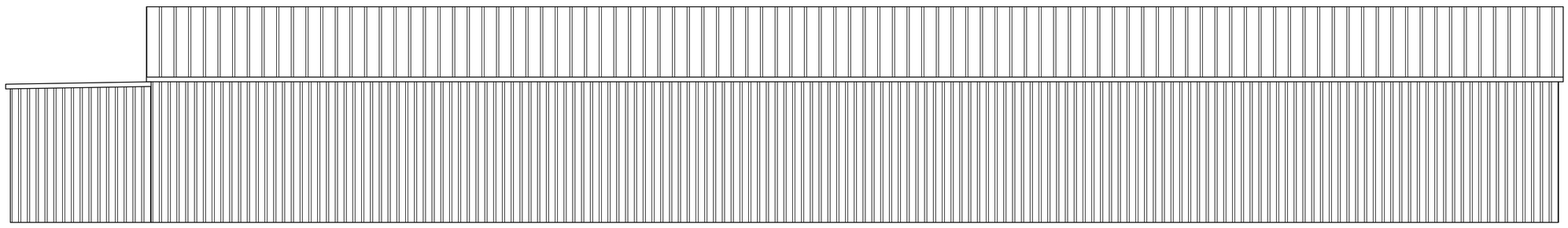
Exibit 8
Elevations

Oklahome Green To Gold
OMMA Waste Facility

43470 Moccasin Trail Rd.
Meeker Oklahoma 74855



WEST ELEVATION



NORTH ELEVATION

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

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: Hillary Young, DEQ, Land Protection Division, P.O. Box 1677, Oklahoma City, OK 73101-1677; (405)702-5100; 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

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.

On August 15, 2023, Oklahoma Green to Gold was approved to store dry plant material for up to six (6) months with the condition that the material is shredded within the first 24 hours of receipt.

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 medical marijuana waste 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 medical marijuana waste 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 (131º F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113º 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.
    - 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 #5 (6/4/25)

MEDICAL MARIJUANA COMPOST

STANDARD OPERATING PROCEDURE (SOP)

(PROCEDURE FOR APPROXIMATELY 1700-POUNDS)

ECO DRUM COMPOSTER

#2

- If medical marijuana waste 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 medical marijuana waste 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 1700 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.

- 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 (131º F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113º 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.
    - 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 #5 (6/4/25)

MEDICAL MARIJUANA COMPOST

STANDARD OPERATING PROCEDURE (SOP)

(PROCEDURE FOR APPROXIMATELY 2000-POUNDS)

CULVERT COMPOSTER

#3

- If medical marijuana waste 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 medical marijuana waste 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

(131º F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113º 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.
    - 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 #5 (6/4/25)

MEDICAL MARIJUANA COMPOST

STANDARD OPERATING PROCEDURE (SOP)

(PROCEDURE FOR APPROXIMATELY 1700-POUNDS)

ECO DRUM COMPOSTER

#4

- If medical marijuana waste 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 medical marijuana waste 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 1700 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.

- 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 (131º F) or higher for three continuous days, followed by at least 14 days with a minimum of 45°C (113º 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.
    - 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 #5 (6/4/25)

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 to an area in the permitted process area outside of the building
  - 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 ingulf 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 #2 (1/3/25)

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 staged in designated areas for either: Staging and prepping for compost production or Incinerating.
    - 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. Composted materials include medical marijuana waste food products, medical marijuana waste plants, stalks, stems, fan leaves, flower, trim, and root balls.
    - All MMW must be processed and disposed of within 6 months.
    - Non-compostable and other waste. Plastics, glass, gloves, OMMA tags, and household waste mixed in incidentally will be all be separated and sent to the landfill.
- 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 and electronically filed.
- Once scanned 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 #4 (6/4/25)

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 or incinerating) 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

- Rent a 30-yd dumpster to dispose of materials at $600.00 each = $600.00.
- 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 are 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 2025 financial assurance and closure cost estimates with inflation adjustment rate of 2.41% = $15,110.70 + 364.17= $15,474.87

Cost Estimates and Financial Assurance

DEQ-Permit number: 3563007

Attn: Anne Marie Smith,

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 2025 at 2.41% and cost to clean up equipment is estimated as follows per our post closure plan:

- Additional 30-yd dumpster at $600.00 each = $600.00
- 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 2025 financial assurance and closure cost estimates with inflation adjustment rate of 2.41% = $15,110.70 + 364.17 = $15,474.87

Thank You,

Darrel Armer 3/26/25
Operating Manager
Oklahoma Green to Gold Recycling, LLC
479-651-0950

Exhibit # 15

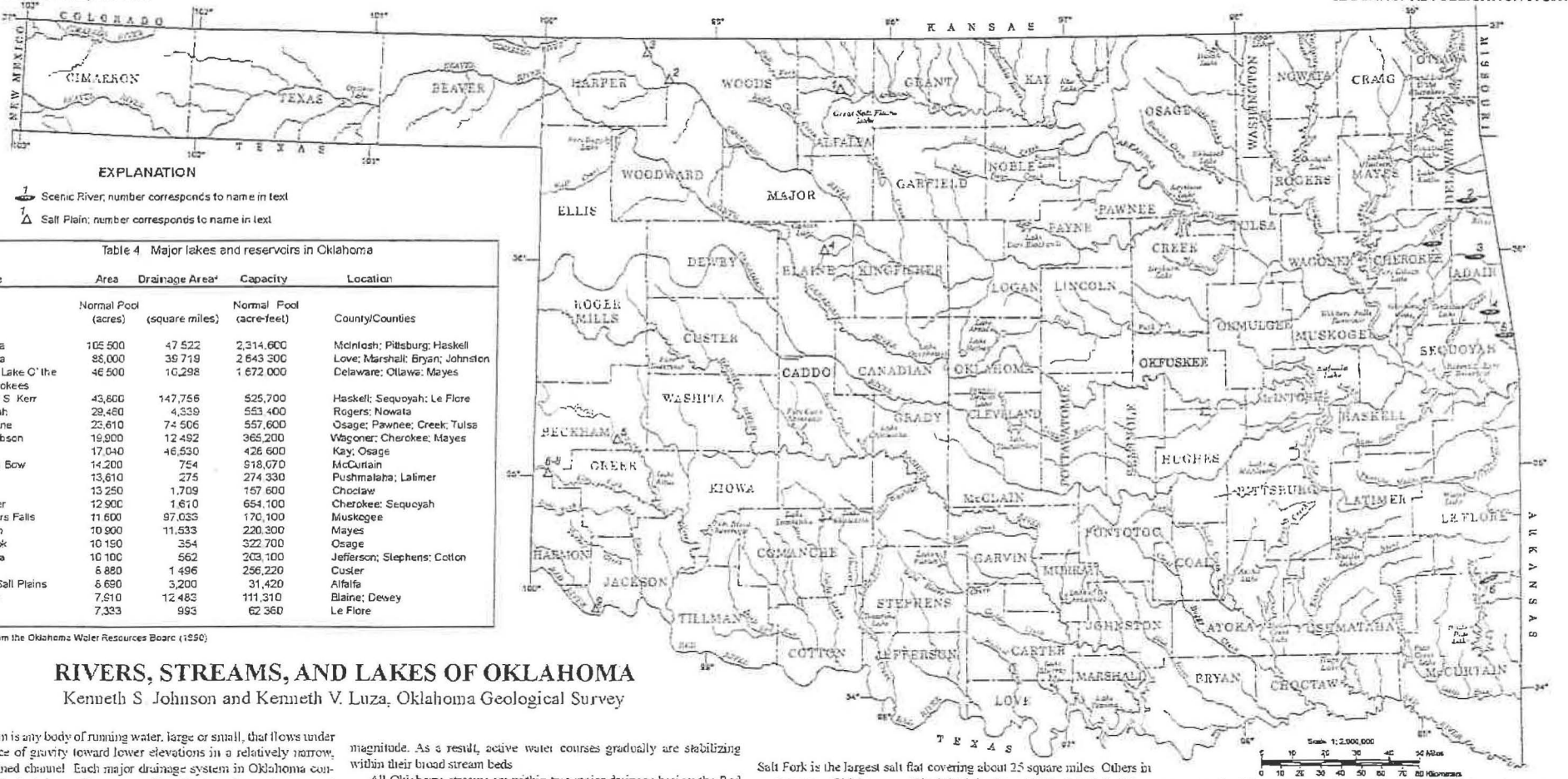


Table 4 Major lakes and reservoirs in Oklahoma

Lake	Area Normal Pool (acres)	Drainage Area* (square miles)	Capacity Normal Pool (acre-feet)	Location County/Counties
Eufaula	105 500	47 522	2,314,600	McIntosh; Pittsburg; Haskell
Texoma	88,000	39 719	2 643 300	Love; Marshall; Bryan; Johnston
Grand Lake O' the Cherokees	46 500	10,298	1 672 000	Delaware; Ottawa; Mayes
Robert S Kerr	43,800	147,756	525,700	Haskell; Sequoyah; Le Flore
Cologah	29,460	4,339	553 400	Rogers; Nowata
Keystone	23,610	74 506	557,600	Osage; Pawnee; Creek; Tulsa
Fort Gibson	19,900	12 492	365,200	Wagoner; Cherokee; Mayes
Kaw	17,040	46,530	426 600	Kay; Osage
Broken Bow	14,200	754	918,670	McCurtain
Sardis	13,610	275	274 330	Pushmataha; Latimer
Hugo	13 250	1,709	157 600	Choctaw
Tenkiller	12 900	1,610	654,100	Cherokee; Sequoyah
Webbers Falls	11 600	97,033	170,100	Muskogee
Hudson	10 900	11,533	220,300	Mayes
Skiatook	10 190	354	322 700	Osage
Waurika	10 100	562	203,100	Jefferson; Stephens; Cotton
Foss	8 880	1 496	256,220	Custer
Great Salt Plains	8 690	3,200	31,420	Alfalfa
Canton	7,910	12 483	111,310	Blaine; Dewey
Wister	7,333	993	62 360	Le Flore

*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 plains 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), Baron 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

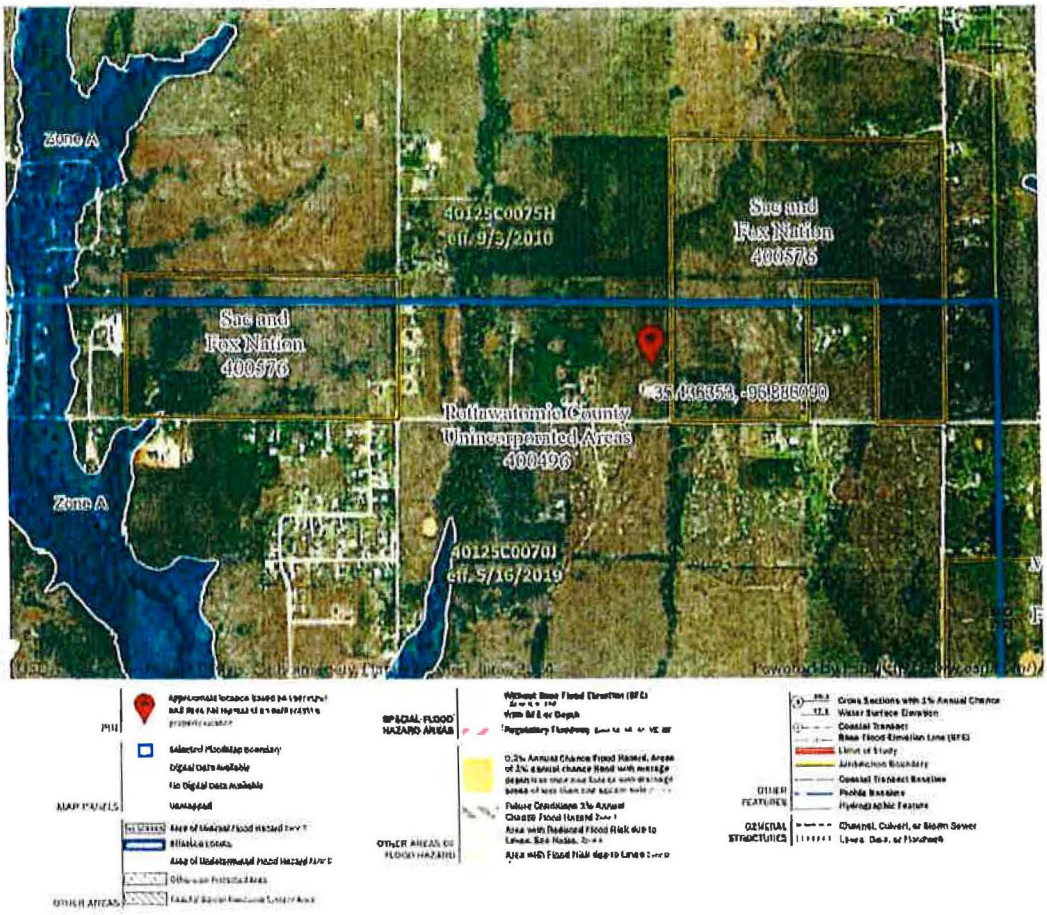
Natural salt plains occur along some rivers where natural brines seep to the surface. In the Arkansas River drainage, Great Salt Plains (1) on Salt Fork is the largest salt flat covering about 25 square miles Others in northwestern Oklahoma are Big Salt Plain (2) and Little Salt Plain (3) on the Cimarron River, and Ferguson Salt Plain (4) in Blaine County Salt plains in the Red River drainage are Boggy 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 Keystone 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 62 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 #14



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OKLAHOMA BIOLOGICAL SURVEY
The UNIVERSITY *of* OKLAHOMA

DATE: 19 June 2025 ONHI REF: 2025-308-BUS-GGR

TO: Darrel Armer
Oklahoma Green to Gold Recycling LLC
service@oklahomagreentogold.com

RE: Project Name: 2019 Letter Update
County: Pottawatomie
Nearest Town: Shawnee

Regarding your request for information on the presence of endangered species or other elements of biological significance at the project referenced above, we have reviewed information currently in the Oklahoma Natural Heritage Inventory database.

We found NO occurrences of relevant species within your project or within 1 mile of your project boundary.

Because the ONHI database is only as complete as the information that has been collected, we cannot say with certainty whether or not a given site harbors rare species or ecological communities.

If you have further questions regarding biological information within your project area, please contact us.

Illiyana Ferguson
Oklahoma Natural Heritage Inventory, Student Assistant
OBSdatarequest@ou.edu

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, OK 74129-1428
Phone: (918) 581-7458 Fax: (918) 581-7467

In Reply Refer To: 06/30/2025 01:26:45 UTC
Project Code: 2025-0115459
Project Name: Oklahoma Green to Gold Recycling

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological

evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

https://www.fws.gov/sites/default/files/documents/endangered-species-consultation-handbook.pdf

Migratory Birds: In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts, see https://www.fws.gov/program/migratory-bird-permit/what-we-do.

It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures, see https://www.fws.gov/library/collections/threats-birds.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit https://www.fws.gov/partner/council-conservation-migratory-birds.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

- USFWS National Wildlife Refuges and Fish Hatcheries
- Bald & Golden Eagles
- Migratory Birds
- Wetlands

OFFICIAL SPECIES LIST

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Oklahoma Ecological Services Field Office
9014 East 21st Street
Tulsa, OK 74129-1428
(918) 581-7458

PROJECT SUMMARY

Project Code: 2025-0115459
Project Name: Oklahoma Green to Gold Recycling
Project Type: Landfill - Solid Waste
Project Description: Oklahoma Green to Gold is applying for a Tier III application for our Waste Composting Facility. DEQ is requesting a letter of determination regarding the presence of threatened and endangered species within one mile of the facility permit boundary.

Project Location:

The approximate location of the project can be viewed in Google Maps: https://www.google.com/maps/@35.43661435,-96.88599710217888,14z

Counties: Pottawatomie County, Oklahoma

ENDANGERED SPECIES ACT SPECIES

There is a total of 4 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

---

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

BIRDS

NAME — STATUS

Piping Plover *Charadrius melodus* — Threatened

Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered.
There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/6039

Rufa Red Knot *Calidris canutus rufa* — Threatened

There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/1864

INSECTS

NAME — STATUS

American Burying Beetle *Nicrophorus americanus* — Threatened

Population: Wherever found, except where listed as an experimental population
No critical habitat has been designated for this species.
Species profile: https://ecos.fws.gov/ecp/species/66

Monarch Butterfly *Danaus plexippus* — Proposed Threatened

There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat.
Species profile: https://ecos.fws.gov/ecp/species/9743

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

USFWS NATIONAL WILDLIFE REFUGE LANDS AND FISH HATCHERIES

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

BALD & GOLDEN EAGLES

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described in the various links on this page.

---

1. The Bald and Golden Eagle Protection Act of 1940.
2. The Migratory Birds Treaty Act of 1918.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA). Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their nests, should follow appropriate regulations and implement required avoidance and minimization measures, as described in the various links on this page.

The data in this location indicates that no eagles have been observed in this area. This does not mean eagles are not present in your project area, especially if the area is difficult to survey. Please review the 'Steps to Take When No Results Are Returned' section of the Supplemental Information on Migratory Birds and Eagles document to determine if your project is in a poorly surveyed area. If it is, you may need to rely on other resources to determine if eagles may be present (e.g. your local FWS field office, state surveys, your own surveys).

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

MIGRATORY BIRDS

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

---

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.
3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Red-headed Woodpecker *Melanerpes erythrocephalus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9398	Breeds May 10 to Sep 10

PROBABILITY OF PRESENCE SUMMARY

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

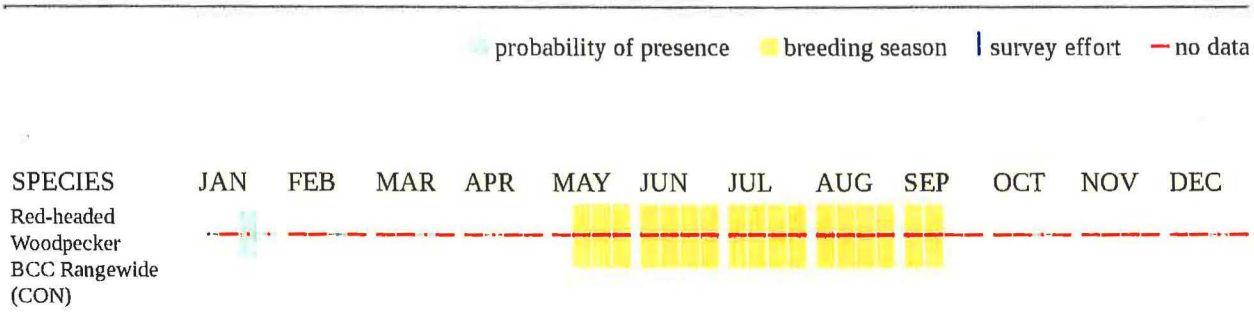
Probability of Presence ( )

Green bars; the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during that week of the year.

Breeding Season ( )
Yellow bars; liberal estimate of the timeframe inside which the bird breeds across its entire range.

Survey Effort (|)
Vertical black lines; the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data (–)
A week is marked as having no data if there were no survey events for that week.



Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management

- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

WETLANDS

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

IPAC USER CONTACT INFORMATION

Agency: Private Entity
Name: Allison Armer
Address: 43470 Moccasin Trail Rd
City: Meeker
State: OK
Zip: 74855
Email service@oklahomagreentogold.com
Phone: 4797397925

WARD Laboratories, Inc.

PAP-Accredited NAPT 2022

Ag Testing - Consulting

Account No. : 92840

Soil Analysis Report

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

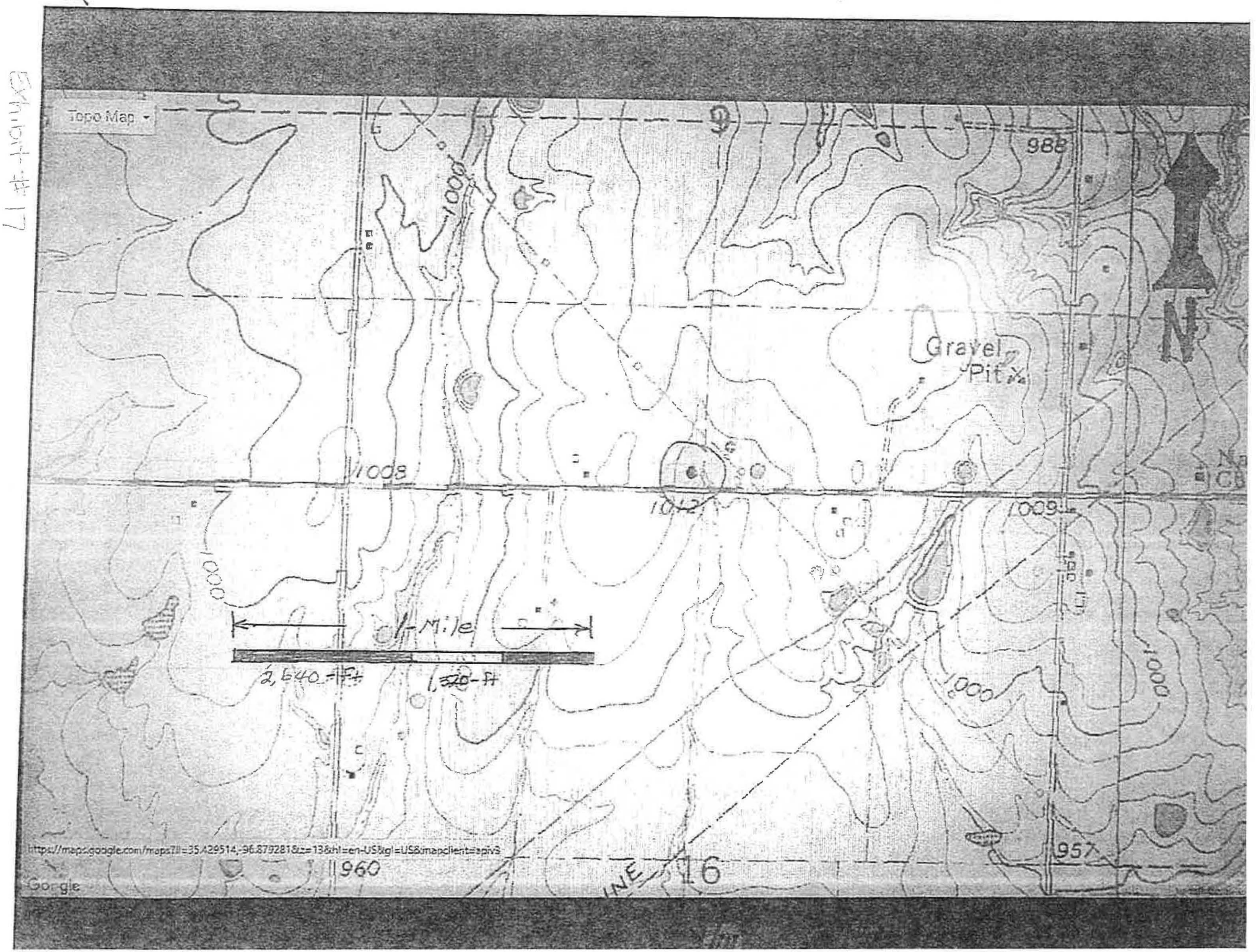
Invoice No. : 1377829
Date Received : 08/05/2022
Date Reported : 08/09/2022

Results For : OKLAHOMA GREEN TO GOLD RECYCLING LLC
Location :

Lab No. : 81126 ID :	Depth : 0 - 8
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

Reviewed By : Patrick Freeze 8/12/2022 Copy : 1

Bus: 308-234-2418
Fax: 308-234-1940
web site
4007 Cherry Ave., P.O Box 788
Kearney, Nebraska 68848-0788


Topo Map
988
1000
Gravel Pit
N
1008
1012
1009
1000
1/4 Mile
2,640 Ft
1,320 Ft
1000
1000
https://maps.google.com/maps?ll=35.429514,-96.879281&z=13&hl=en-US&gl=US&mapclient=apiv3
960
957
NE 16
Google

K.

Exhibit #18

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Print from your computer: Landscape | Portrait
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Browse and view FREE US Geological Survey, US Forest Service, and NRCan topo maps for the US and Canada.

MyTopo
One South Broadway
Billings, MT 59101

support@mytopo.com
877.587.9004
406.294.9411

K 1-mile #1

Exhibit #19

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 these 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
2488 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 405/522-6208.

Sincerely,

Brooks Tramel
Wetlands Program Coordinator
Water Quality Division

cc: Wetlands file

F.

2019-6391
Filed for record in
POTTAWATOMIE OKLAHOMA
WESLEY FLEWALLEN COUNTY CLERK
12-12-2019 At 09:59 am.
DEED 12.00

(Individual Form)
JOINT TENANCY WARRANTY DEED

KNOW ALL MEN BY THESE PRESENTS:

Havered Lee Hill Sr A Single Person party of the first part, in consideration of the sum of Ten And No/100 Dollars ($10.00) and other valuable considerations to it in hand paid, the receipt of which is hereby acknowledged does hereby grant, bargain, sell and convey unto **Darrel Armor and Wanda Armer** as joint tenants and not as tenants in common, with the right of survivorship, the whole estate to vest in the survivor in the event of the death of either, parties of the second part, the following described real property and premises situate in Pottawatomie County, State of Oklahoma, to-wit:

The East Half of the East Half of the Southeast Quarter of the Southwest Quarter (E/2 E/2 SE/4 SW/4) in Section Nine (9), Township Eleven (11) North, Range Four (4) East of the Indian Meridian, Pottawatomie County, Oklahoma.

Subject to easements, rights of way and restrictive covenants of record. Less and except all oil, gas and other minerals previously reserved or conveyed of record.

Together with all the improvements thereon and the appurtenances thereunto belonging, and warrant the title to same.

TO HAVE AND TO HOLD the above described premises unto the said parties of the second part, as joint tenants, and to the heirs and assigns of the survivor forever, free, clear and discharged of and from all former grants, charges, taxes, judgments, mortgages and other liens and encumbrances of whatsoever nature.

IN WITNESS WHEREOF, the undersigned have executed this document on the date(s) set forth below.

Signed and delivered November 12, 2019.

Havered Lee Hill Sr

Havered Lee Hill Sr

The State of OKLAHOMA

INDIVIDUAL ACKNOWLEDGMENT

County of OKLAHOMA

Before me, the undersigned, a Notary Public, in and for said County and State, on this 12 day of Nov, 20 19, personally appeared Havered Lee Hill Sr, A Single Person to me known to be the identical person(s) who executed the within and foregoing instrument and acknowledged to me that (he/she/they) executed the same as (his/her/their) free and voluntary act and deed for the uses and purposes therein set forth.

Given under my hand and seal the day and year last above written.

CHRISTIE NILSON NOTARY PUBLIC STATE OF OKLAHOMA COMMISSION # 18008 EXPIRES 10-10-22

Christie Nilson

Notary Public in and for the State of OK
Notary's Printed Name:
Notary's Commission Expires:

Mail Deed and Tax Statements To:
Darrel Armer and Wanda Armer
109109 S 4787 Rd
Roland, OK 74954

POTTAWATOMIE COUNTY OKLAHOMA COUNTY CLERK

Presented for filing by and return to:
Chicago Title Oklahoma Co
3401 NW 63rd, Suite 300
Oklahoma City, OK 73116
File No.: 710101904459
Title Insurance Commitment, if any, issued by:
Chicago Title Insurance Corp

STATE OF OKLAHOMA
Pottawatomie County
Documentary Stamps: $ 102.00

(2)

F1.

December 28, 2019

To whom it may concern,

We, Wanda and Darrel Armer, hereby agree to lease the four thousand square feet building located at 43470 Moccasin Trail Road Meeker, OK 74855 to Oklahoma Green to Gold Recycling, LLC (OGTGR) for five years.

We, Wanda and Darrel Armer, are aware that Oklahoma Green to Gold Recycling, LLC (OGTGR) has applied for a solid waste permit through ODEQ to facilitate a worm farm. We are also aware that Oklahoma Green to Gold Recycling, LLC (OGTGR) will be applying for a license through Oklahoma Medical Marijuana Authority (OMMA) to process medical marijuana waste at the worm farm located at 43470 Moccasin Trail Road Meeker, OK 74855.

Thank you,

Wanda Armer Wanda Sue Armer

Darrel Armer

Home Address:

109109 S 4767 Rd

Roland, OK 74954

Groundwater Well Record Search

Oklahoma Water Resources Board

Legend

Groundwater Wells

Groundwater Wells

Monitoring Wells

Other Wells

Reported Well Logs

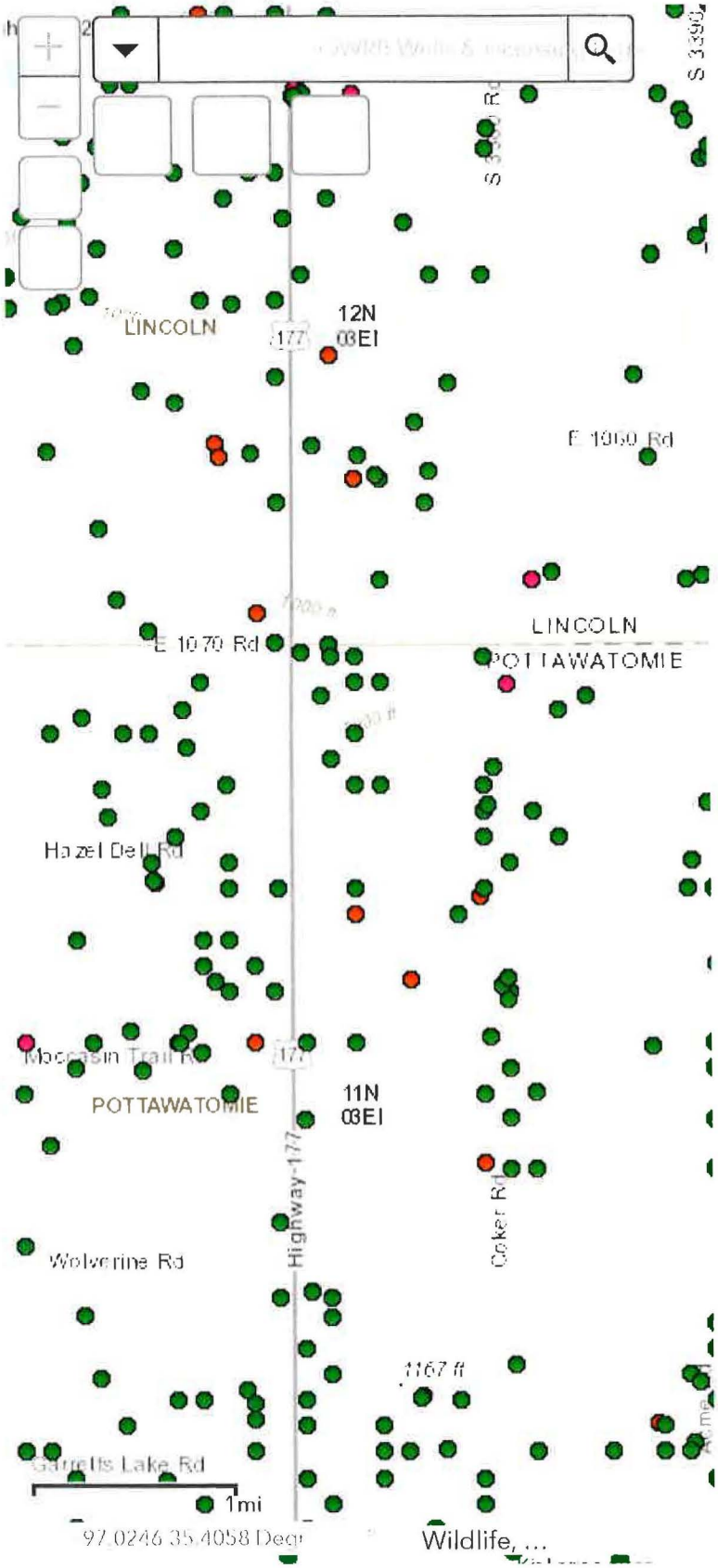
Oklahoma PLSS GRID

Municipal Boundaries

State Boundary

County Boundaries

Townships



Groundwater Well Record Search

Oklahoma Water Resources Board