REVISED REFUSE DISPOSAL PERMIT APPLICATION
PHASE I REPORT

HAWKINS POINT LANDFILL
3801 Fort Armistead Road
Baltimore, Maryland

May 18, 2021 rev. January 12, 2022

Prepared for:

HAWKINS MANAGEMENT LLC
2519 Wilkens Avenue
Baltimore, Maryland 21223

Submitted to:

SOLID WASTE PROGRAM
Maryland Department of the Environment
1800 Washington Boulevard, Suite 605
Baltimore, MD 21230-1719
Attn: Mr. Ed Dexter and Andrew Grenzer

Prepared by:

GEO-TECHNOLOGY ASSOCIATES, INC.
Geotechnical and Environmental Consultants
14280 Park Center Drive, Suite A
Laurel, Maryland 20707
(410) 792-9446 or (301) 470-4470
www.gtaeng.com

GTA Project No. 200469
May 18, 2021 rev. January 12, 2022

Hawkins Point Landfill
3801 Fort Armistead Road
Baltimore, Maryland
(Existing Permit: No. 2019-WIF-0527A)

Dear Mr. Dexter:

Geo-Technology Associates, Inc. (GTA) has prepared this Revised Phase I Report for a Refuse Disposal Permit for the remaining capacity of the above-referenced landfill (“Site”). This Phase I Report has been prepared as part of an application for a refuse disposal permit for the existing Hawkins Point Landfill at 3801 Fort Armistead Road in the Curtis Bay area of Baltimore, Maryland (Existing Refuse Disposal Permit No. 2019-WIF-0527A).

This report transmits GTA’s findings. Should you have any questions regarding this report, or should you require additional information, please contact our office at (410) 792-9446.

Sincerely,

GEO-TECHNOLOGY ASSOCIATES, INC.

Kristen Daly
Senior Project Scientist

for

Paul H. Hayden, P.C., L.R.S., R.S.M.
Executive Vice President
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1.0 INTRODUCTION

1.1 Overview and Purpose

At the request of Hawkins Management LLC, Geo-Technology Associates, Inc. (GTA) has prepared this Phase I Report as part of an application for a refuse disposal permit for the existing Hawkins Point Landfill at 3801 Fort Armistead Road in the Curtis Bay area of Baltimore, Maryland (the “Site”, Figure 1 – Site Location Map). The Site was a landfill previously used to support the operations of the now-closed Cristal USA, Inc. manufacturing plant. The landfill previously accepted industrial waste and has remaining capacity to accept additional waste. The landfill recently began operating under the existing permit until a new permit is issued per a written agreement between the applicant and prior owner.

The Site is currently permitted through the Maryland Department of the Environment’s (MDE) Solid Waste Program (SWP) permit no. 2019-WIF-0527A issued to the prior owner, Hawkins Point LLC, and originally operated by Cristal USA, Inc. The Site recently changed ownership and operation under the current permit has been transferred to the current owner Hawkins Management LLC. This report represents the permit application for Hawkins Management LLC to accept waste for the remaining capacity of the landfill.

1.2 Limitations

This report was prepared by GTA for Hawkins Management LLC, under the terms and conditions of GTA’s contract(s) with Hawkins Management LLC. This report was prepared by GTA for the sole and exclusive use of Hawkins Management LLC. GTA acknowledges that this document is being submitted to the MDE and will be part of the public record, and that MDE is expected to use this report as part of its review process. However, use of this report by any third party is at their sole risk. GTA is not responsible for any claims, damages, or liabilities associated with third-party use.
1.3 Report Organization

This report represents the initial submission of the application for a solid waste refuse disposal permit as outlined in MDE’s solid waste regulation 26.04.07.06. Pursuant to the regulation, this report contains the following:

- A completed and executed application form (Appendix A);
- The site location outlined on a current USGS topographic quadrangle map (Figure 1);
- Site features including property boundaries, existing structures, surficial features such as ponds, streams, impoundments, utility pipelines, and wells shown on a topographic map (Figure 2);
- A map showing land use and zoning within one half mile (Figure 7);
- A map and description of soils and geology at the site (Section 3); and,
- A description of the proposed operations of the facility including types of waste, potential sources of waste, and capacity (Section 5).

2.0 BACKGROUND

2.1 Site Description

The Site consists of approximately 30 acres located southeast of Fort Armistead Road in Baltimore, Maryland. The majority of the Site is a landfill that occupies approximately 23 acres of the parcel, with an access road around the perimeter of the landfill and several small outbuildings including a main operations office in the northern portion of the property near an entrance gate. A stormwater retention pond is located at the southwestern corner of the property between the landfill and the perimeter access road. The property is accessed by a gated entry that extends south from Fort Armistead Road. The Site is bounded to the northwest and southwest by CSX railroad tracks followed by Fort Armistead Road and a 65-acre landfill owned by Constellation Energy, respectively; to the southeast by the Anne Arundel County-Baltimore City boundary followed by industrial land operated by the Maryland Port Authority; and, to the northeast by industrial land formerly part of the Cristal USA, Inc. facility followed by the Patapsco River. A Site Location Map for the subject property is presented as Figure 1.

2.2 Site History and Operations

The Site was historically associated with the adjacent Cristal USA, Inc. facility that comprised approximately 148 acres and included a chemical manufacturing facility that produced titanium oxide since approximately 1954. Operations of the Cristal USA, Inc. manufacturing plant
ceased in 2011. The landfill was approved to accept waste from the manufacturing process that included gypsum-sulfate process waste, dredged material from the wastewater treatment lagoons associated with the manufacturing plant, brick and refractory brick, soil excavated from the plant property for construction/maintenance purposes, rubble, ore residues, sand, lime, and road asphalt. Third party waste was acceptable in the event that it fit into one of the permitted categories of non-hazardous industrial waste and was properly characterized prior to acceptance. When manufacturing operations ceased, the landfill was used to stage clay excavated from the neighboring 65-acre landfill which began in 2009. The landfill has been inactive since that time aside from the operations and maintenance, groundwater monitoring, and reporting required by the permit.

The landfill is estimated to have a capacity of approximately 3 million cubic yards, of which approximately 2 million is estimated to be available following removal of the stockpiled clay. The maximum height of the waste pile as currently permitted is 218 feet above mean sea level (amsl). The landfill consists of Cells 1 and 2, both of which have been constructed. As-built plans show that the cells were excavated to approximately 11 feet amsl in the northwest corner of the landfill and gently slope down to approximately 8 feet amsl in the southwest corner. A bottom liner was constructed across the entire base of the landfill footprint consisting of a 12-inch thick compacted clay layer that conforms to the required maximum hydraulic permeability of $1 \times 10^{-7}$ cm/sec. A leachate collection system drains leachate and rainwater into a network of pipes and a sump. Leachate is currently pumped to a settling basin on the adjacent former Cristal USA, Inc. property that is scheduled to be abandoned, but is planned to be redirected to discharge to the Patapsco River by way of an easement on the adjacently southeastern property, through a treatment system if needed based on leachate sampling results and discharge requirements.

### 3.0 SITE SETTING

#### 3.1 Site Topography

The existing topographic site plan indicates that the landfill has been partially filled and the majority of the previously-placed fill consists of clayey soils. Topographically, the vicinity of the Site can be characterized as gently sloping to the east towards the Patapsco River, which is
located approximately 2,000 feet to the east. Elevations on the Site range from 50 feet amsl around the perimeter of the property to approximately 140 feet amsl at the peak of the landfill mound. The USGS Curtis Bay, MD 1957 map does not show any surface water features or wetland areas on the Site; however, the landfill had not yet been developed and the Site is shown as mostly flat and at approximate elevation of 50 feet amsl. An Existing Site Conditions plan prepared for the 2019 refuse permit re-application package by Geosyntec Consultants, Inc. and dated September 2019 depicts the current topography on the Site, including the existing sediment basin in the southwestern portion of the Site (Figure 2). Based on the available topographic maps and site observations, no sinkholes, seeps, springs, recently-active faults, or rocky outcrops were identified in or near the Site.

3.2 Site Geologic Conditions

According to the Geologic Map of Maryland (1968) and the Geologic Map of the Baltimore East Quadrangle (1979), published by the Maryland Geologic Survey, the site is within the Coastal Plain Physiographic Province. The Coastal Plain is characterized by undifferentiated and interlayered sedimentary deposits derived from eroded and transported rock formations to the north and west. Coastal Plain sediments were deposited in a marine and alluvial environment during periods of fluctuating sea levels. More specifically, the Site is shown to be underlain by the silt-clay facies of the Potomac Group (Kpc), which includes the Patapsco, Arundel, and Patuxent Formations. The Patapsco Formation silt-clay facies is described as massive and thick-bedded variously-colored clay with interbedded sand or silt lenses, and well-sorted fine- to medium-grained sand with thin clay beds. Within the site vicinity, the sand-gravel facies includes interbedded quartz sand, pebbly sand and gravel, and subordinate silt and clay. The Patapsco Formation is estimated to be over 200 feet thick below the Site, and overlies crystalline bedrock that dips to the southeast.

3.3 Site Soil Conditions

According to a Phase II Environmental Site Assessment Report dated November 2015, explorations encountered a subsurface profile consisting of interbedded sands and clays consistent with the Patapsco Formation. The United States Department of Agriculture soil survey map for
the Site indicated that four units are located within the site boundaries: Beltsville-Urban land complex (2UB), Galestown loamy sand (11B), Sassafras gravelly loam (29B), and Udorthents clay (38C).

Based on the most recent groundwater monitoring report for the property dated December 7, 2020: “Groundwater in the Patapsco formation occurs primarily within upper and lower sand facies which are separated by a clay confining layer. Locally, the sand layers can be discreet and discontinuous, but when extensive, form the upper regional aquifer. Groundwater within the clay facies rarely occurs as free moisture in occasional sand pockets and this portion of the formation is generally impervious with a thickness of approaching and exceeding one hundred feet in the vicinity of the landfill site.”

3.4 Groundwater Conditions

The groundwater monitoring wells at the Site were installed in 1993 to depths ranging between approximately 137 to 192 feet bgs (80 and 120 feet below the base of the landfill), likely within a confined aquifer in the sandy unit of the Patapsco Formation. During the most recent monitoring event, groundwater elevation ranged between 2.40 and 5.30 feet amsl with a flow direction towards the southeast.

Groundwater is monitored semi-annually, generally in January and July, according to the requirements of the refuse permit and a Groundwater Monitoring Plan prepared by TM Engineering, Inc. and dated April 27, 1992 revised August 2019. The groundwater samples are analyzed for volatile organic compounds (VOCs), chemical oxygen demand, dissolved metals, total alkalinity, hardness, sulfate and chloride, nitrates, and fluoride. Characteristics measured during sampling include pH, turbidity, temperature, dissolved oxygen, carbon dioxide, and electrical conductivity. In general, most analytes are reported below laboratory reporting limits or United State Environmental Protection Agency Drinking Water Standards, or appear to be mostly consistent with expected naturally-occurring groundwater conditions and not indicative of contamination.
4.0 SURROUNDING LAND USE

The Site is situated in an area that is predominantly zoned industrial or maritime industrial. The Site is bounded to the northwest and southwest by CSX railroad tracks followed by Fort Armistead Road and a 65-acre landfill owned by Constellation Energy, respectively; to the southeast by the Anne Arundel County-Baltimore City boundary followed by industrial land operated by the Maryland Port Authority; and, to the northeast by industrial land formerly part of the Cristal USA, Inc. facility followed by the Patapsco River.

5.0 PROPOSED USE

5.1 Area Served

The landfill is intended to service third-party customers for disposal of acceptable wastes after MDE approval. The service area is not restricted to any particular county or city, but rather is focused on a specific waste stream for sites in the surrounding area.

5.2 Types of Waste Accepted

Wastes accepted would be the same wastes that the landfill is currently permitted to accept and similar materials. Some prior materials were process-specific for the now closed Cristal USA, Inc. plant such as gypsum-sulfate process waste, lagoon dredging/chloride process solids, and batch attack by-products such as mud and ore residues that are no longer applicable. Under the current permit, the following materials are accepted that will continue to be disposed at the landfill:

- Brick, including refractory brick
- Excavated soil, clay, and rubble
- Road asphalt

Additionally, the facility will accept additional third-party waste including:

- Non-friable asbestos-containing materials
- Friable Asbestos-Containing Materials (ACM) in a GPS-marked and dedicated area and subject to special handling and management requirements under COMAR and NESHAPS
The landfill will not accept household refuse, landscape debris, liquid waste, liquid paint, tar, paint thinner, other solvents, or hazardous waste. Third-party waste may be accepted at the landfill, excluding hazardous waste or waste that is included under RCRA Subtitle C regulation 40 CFR 261.4(b)(7). Should the landfill consider accepting third-party waste, the permittee will submit a written request to the Department for authorization to dispose of the waste, including waste characterization as required by the Department. The permittee will not accept any third-party waste until the request is submitted and approval is issued by the Department.

Third-party waste will be analyzed for Toxicity Characteristic Leaching Procedure (TCLP) and all analytical results maintained onsite. A logbook of accepted waste and results will be maintained onsite and available for inspection during operating hours of the landfill.

5.3 Site Receiving

The landfill is currently accessed via a locked gate along a driveway that extends south from Fort Armistead Road. The landfill operations and visitor reception are managed out of the trailer building on the interior of the gate. Loads will be directed to the active portion of the landfill for disposal, except for friable ACM which will be directed to the asbestos disposal area. The facility will operate during daylight hours and access will be controlled at all times through a monitored gate.

6.0 ADMINISTRATIVE

Any modifications to the operating plan or requests to accept different types of waste will be submitted to MDE prior to implementation. The permittee will maintain records of waste characterization prior to acceptance, a logbook documenting loads received, and provide records upon request to MDE. The facility will perform inspection of incoming waste and dust and litter control, and maintain an approved stormwater management plan for the entire site.

***** END OF REPORT *****
FIGURES
Approximate Subject Property Boundary

Notes
1. Based on the USGS Curtis Bay, MD 7.5 Minute Quadrangle Map.
2. Copyright 2013 MyTopo, Inc.
Notes

1. Property boundaries and site conditions are approximate.
SOURCE: MARYLAND GEOLOGICAL SURVEY
HTTP://WWW.MGS.MD.GOV/ESIC/GEO/BAL.HTML
## Hawkins Point Landfill

### Soil Distribution Map

Source: USDA Soil Mapper

[https://websoilsurvey.sc.egov.usda.gov/app/websoilsurvey.aspx](https://websoilsurvey.sc.egov.usda.gov/app/websoilsurvey.aspx)

<table>
<thead>
<tr>
<th>Map Unit Symbol</th>
<th>Map Unit Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>2B</td>
<td>Beltsville-Keyport complex, 0 to 8 percent slopes</td>
</tr>
<tr>
<td>2UB</td>
<td>Beltsville-Urban land complex, 0 to 8 percent slopes</td>
</tr>
<tr>
<td>11B</td>
<td>Galestown loamy sand, 0 to 8 percent slopes</td>
</tr>
<tr>
<td>29B</td>
<td>Sassafras, gravelly loam, 0 to 8 percent slopes</td>
</tr>
<tr>
<td>38C</td>
<td>Udorthents, clayey, very deep, 0 to 15 percent slopes</td>
</tr>
<tr>
<td>44UC</td>
<td>Urban land, 0 to 15 percent slopes</td>
</tr>
</tbody>
</table>
HAWKINS POINT LANDFILL

Approximate Subject Property Boundary

BALTIMORE CITY

Legend:
- G General Industrial Zoning
- OS Open Space
- MI Maritime Industrial Zoning
- M3 General Manufacturing
- W3 Heavy Industrial

Approximate Scale: 1 inch = 1,000 feet

SOURCE: BALTIMORE CITYVIEW

SOURCE: ANNE ARUNDEL COUNTY LAND USE AND ZONING VIEWER

GEO-TECHNOLOGY ASSOCIATES, INC.
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HAWKINS POINT LANDFILL
BALTIMORE CITY, MARYLAND

ZONING MAP

PROJECT: 200476
DATE: JANUARY 2021
SCALE: 1" = 1000'
DESIGN BY: BRD
REVIEW BY: KSD
FIGURE: 7
Refuse Disposal Permit Application

Application for: ☐ New Permit ☐ Renewal Permit

Existing Permit No.: 2019 - WIF - 0527A Issued Date: 01 / 17 / 20 Expiration Date: 01 / 16 / 25

Applicant's Legal Name: Hawkins Management LLC

Applicant's Status: ☐ Individual ☐ Corporation ☐ Government ☐ Other:

Federal Employer Identification No.: 85-3415354

Maryland State Department of Assessments and Taxation (SDAT) ID No.: W20519013

Please note that a business/entity must be registered to do business in Maryland before a permit can be issued. The business or entity's information provided in this application must match the information in the SDAT register.

Proof of workers' compensation coverage is required under § 1-202 of the Environment Article. Please provide one of the following:

1. A copy of a Certificate of Compliance issued by the Maryland Workers' Compensation Commission; or
2. Workers' Compensation Insurance Policy/Binder Number: Hawkins Management LLC 800559700

Applicant's Mailing Address: 2519 Wilkins Avenue City: Baltimore State: MD Zip Code: 21223

Applicant's Telephone No.: (443) 945 - 5165 Facsimile No.: ( ) - - - -

Emergency Contact Name & Title: Joe BITTNER Telephone No.: (443) 945 - 5165

Facility/Site Name: Hawkins Point Landfill

Facility/Site Address: 3801 Fort Armistead Road City: Baltimore State: MD Zip Code: 21226

County: NIA Maryland Grid Coordinates: _______ N / _______ E

County Zoning Map No.: NIA Lot/Parcel No.: 004/0000 Deed/Liber/Folio No.: MB/21825/0349

State Legislative District: 46 Local Council / Election District: 10

Bay Tributary Watershed Code: C2130903 Latitude/Longitude (Deg/Min/Sec): 39.12.0851/ 76.32.4200

Site Acreage: 30 Facility Acreage (Estimated): 23

Type of Solid Waste Acceptance Facility

☐ Municipal Landfill ☐ Rubble Landfill ¹,² ☐ Industrial Landfill ☐ Land Clearing Debris Landfill ☐ Incinerator ¹,²

☐ Transfer Station ☐ Processing Facility ² ☐ Processing Facility & Transfer Station ¹,²

Notes: 1. Financial Security is required for a privately owned facility.
2. Air Quality Permit may be required.
3. Groundwater Discharge Permit may be required.

Proposed Days & Hours of Operation: Monday - Friday 0700 - 1600

Provide a brief description of solid waste handling and other activities to be conducted at this facility:

The landfill is intended to service 3rd party customers for disposal of acceptable wastes after MDE approval.

If available, attach the following documentation required for permit issuance:

☐ A written statement from the County in which the proposed facility is to be located, demonstrating that the proposed facility meets all applicable County zoning and land use requirements and is in conformity with the County Solid Waste Management Plan, in accordance with §9-210(a)(3) of the Environment Article.

☐ For an incinerator, a written statement from the County where the proposed facility is to be located, demonstrating that the County has an approved Recycling Plan in accordance with §9-204.1 and §9-505 of the Environment Article.

☐ For a rubble landfill, a written statement from the County in which the proposed facility is to be located, demonstrating that the County has specified in the County Solid Waste Plan the types of waste that may be disposed of in the facility, in accordance with §9-210(c) of the Environment Article.

Provide the estimated amount of solid waste to be accepted in Tons (T) or Cubic Yards (CY) from the following facilities and sources:

A. Intermediate Facilities:
   Processing Facilities
   Transfer Stations
   Incinerators

B. Origin Of Waste By Region:
   Within Jurisdiction
   Out-of-Jurisdiction
   Out-of-County in Maryland
   Out-of-State (Specify Name) DC/PA/VA/DE

Form Number: MDE/IMA/PER.001
11-Jul-2018
TTY Users: 1-800-735-2258
Please indicate the estimated amount of solid waste in Tons (T) or Cubic Yards (CY) to be accepted at this facility. This list will be used to determine the type of permit and the list of acceptable materials that will be allowed under the permit for which you are applying.

<table>
<thead>
<tr>
<th>Type of Waste</th>
<th>1st Year (units)</th>
<th>5th Year (units)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Residential (household refuse, domestic waste, garbage, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Commercial (waste from businesses, stores, offices, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Industrial (non-hazardous sludge, dust, off-spec products, etc. from industrial or manufacturing operations or processes)</td>
<td>10,000 cy</td>
<td>10,000 cy</td>
</tr>
<tr>
<td>Construction and Demolition (lumber, masonry, drywall, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Land Clearing Debris (stumps, limbs, leaves, earthen material, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agricultural (crop residue, manure, unprocessed materials, etc.)</td>
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<td></td>
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<tr>
<td>Institutional (non-hazardous waste from schools, hospitals, etc.)</td>
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<tr>
<td>Special Medical Waste (infectious waste from hospitals, doctor's offices, research labs, etc.)</td>
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<td></td>
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<tr>
<td>Animal Carcasses (road kills, farm animals, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulky Waste (appliances, furniture, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Litter (street sweepings, municipal wastebaskets, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scrap Tires (automobiles, trucks, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Requires a separate license for handling or managing tires.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sewage Sludge or Septage</td>
<td></td>
<td></td>
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<tr>
<td>- Requires separate permit for sewage sludge utilization.</td>
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<td></td>
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<tr>
<td>Water Treatment Plant Sludge (alum precipitate, etc.)</td>
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<td></td>
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<tr>
<td>Hazardous Waste (from chemical plants, gas stations, etc.)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asbestos (shingles, insulation, etc.)</td>
<td>10,000 cy</td>
<td>80,000 cy</td>
</tr>
<tr>
<td>- Requires special training and handling</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Incinerator Ash (from incinerators, waste-to-energy incinerators, special medical waste incinerators, boilers, etc.)</td>
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<td></td>
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<tr>
<td>Fly Ash (pollution abatement equipment dusts &amp; bottom ash from coal fired electric generating plants)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (list):</td>
<td>50,000 cy</td>
<td>440,000 cy</td>
</tr>
</tbody>
</table>

By signing this form, I the applicant or duly authorized representative, do solemnly affirm under the penalties of perjury that the contents of this application are true to the best of my knowledge, information, and belief. I hereby authorize the representatives of the Department to have access to the site of the proposed facility for inspection and to records relating to this application at any reasonable time.

I acknowledge that depending on the type of facility applied for, other permits or approvals may be required.

Signature of Applicant: 

[Signature]

Applicant's Name (Print): 

[Name]

Date: 

[Date]

Doctor of Operations: 

[Title]

This Notice is provided pursuant to §10-624 of the State Government Article of the Maryland Code. The personal information requested on this form is intended to be used in processing your application. Failure to provide the information requested may result in your application not being processed. You have the right to inspect, amend, or correct this form. The Maryland Department of the Environment ("MDE") is a public agency and subject to the Maryland Public Information Act. This form may be made available on the Internet via MDE’s website and is subject to inspection or copying, in whole or in part, by the public and other governmental agencies, if not protected by Federal or State law.

Privacy Act Notice: This Notice is provided pursuant to the Federal Privacy Act of 1974, 5 U.S.C. §552a. Disclosure of your Social Security Number or Federal Employer Identification Number on this application is mandatory pursuant to the provisions of §1-203 (2003), Environment Article, Annotated Code of Maryland, which requires the MDE to verify that an applicant for a permit has paid all undisputed taxes and unemployment insurance. Social Security or Federal Employer Identification Numbers will not be used for any purposes other than those described in this Notice.

For questions regarding this application form, please contact the Department at (410) 537-3315