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November 22, 2024

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Chief of Litigation
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200 St. Paul Place
Baltimore, Maryland 21230

Re: National Waste Managers, Inc./Chesapeake Terrace
Rubble Landfill
Case No.: 1993-WRF-0225

Dear All:

Enclosed please find a copy of Petition for Judicial Review of the determination of Maryland Department of Environment dated November 6, 2024, to deny the refuse disposal permit application of National Waste Managers, Inc./Chesapeake Terrace, No. 1993-WRF-0225/

The Circuit Court has assigned this case Civil Action No. C-02-CV-24-003026.

Sincerely,


Susanne K. Henley

cc: Warren Halle



IN THE CIRCUIT COURT FOR ANNE ARUNDEL COUNTY, MARYLAND

PETITION OF:

NATIONAL WASTE MANAGERS, INC.

2900 Linden Lane, Suite 300
Silver Spring, Maryland 20910

FOR JUDICIAL REVIEW OF THE
DECISION OF THE:

MARYLAND DEPARMENT OF ENVIROMENT
1800 Washington Boulevard
Baltimore, Maryland 21230

IN THE CASE OF:

NATIONAL WASTE MANAGERS, INC./
CHESAPEAKE TERRACE RUBBLE LANDFILL *
Refuse Disposal Permit *
No.: 1993-WRF-0225 *

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* CASE NO.: _____

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PETITION FOR JUDICIAL REVIEW

National Waste Managers, Inc., files Petition for Judicial Review of the November 6, 2024, determination of the Maryland Department of Environment to deny the application of a Refuse Disposal Permit for the proposed Chesapeake Terrace Rubble Landfill to be located along Patuxent Road in Odenton, Maryland. This appeal is taken in pursuant to authorization of Maryland Code, Environment Article, Section 1-601(c) and the Maryland Rules 7-201 et. seq., and in support of this petition states as follows:

1. This petition requests judicial review of the November 6, 2024 determination of the Maryland Department of Environment to deny the application of a Refuse Disposal Permit for the proposed Chesapeake Terrace Rubble Landfill to be located along Patuxent

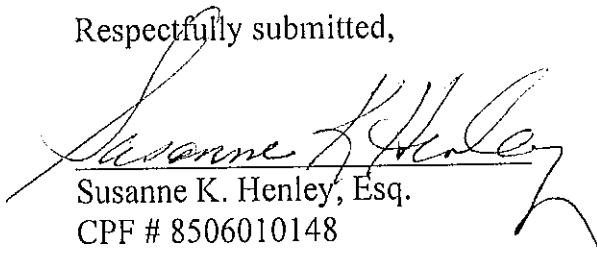
Road in Odenton, Maryland, Exhibit A attached, after having previously published draft permit approving the Refuse Disposal Permit 1993-WRF-0225, published January 23, 2023, Exhibit B attached.

2. The Petitioner is the applicant for the permit, was a party to the agency proceedings, and is the owner of the property for which the refuse disposal permit is sought.

WHEREFORE, the Petitioner respectfully requests that:

- A. This Court review the November 6, 2024 determination of the Maryland Department of Environment;
- B. That this Court determine that the denial was issued in error;
- C. That this Court determine that the draft permit issued by the Maryland Department of Environment be determined to be the final enforceable Maryland Department of Environment refuse disposal permit in application 1993-WRF-0225, Chesapeake Terrace Rubble Landfill;
- D. Alternatively, that this matter be remanded to the Department of the Environment with instructions to enter a final refuse disposal permit within 30 days of this Court's order; and
- E. For such other and further relief as the nature of this cause requires.

Respectfully submitted,



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CERIFICATE OF SERVICE

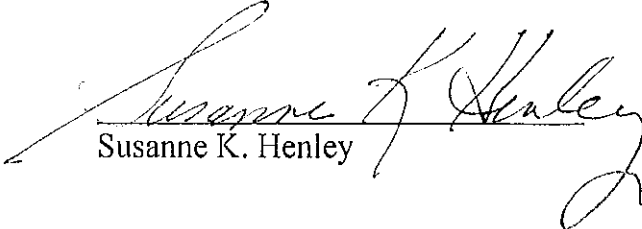
I HEREBY CERTIFY that on this 22 day of November, 2024, a copy of the foregoing Petition for Judicial Review was served by first class mail, postage prepaid to:

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