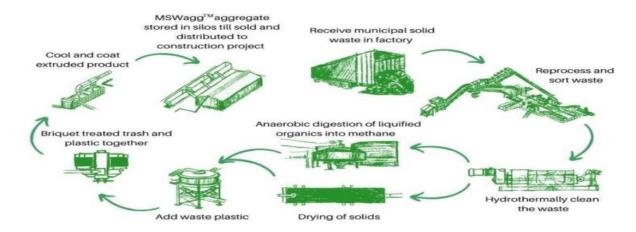
## To Whom It Concerns:

This cover letter is submitted by Louis Structures LLC, (LS) the operator of a now patented recycling process, to request Initial Site Inspection at the former Sheboygan Falls Asylum located at N3773 Garden Parkway in Sheboygan Falls, Wisconsin. Our proposed solid waste processing facility design and operation are summarized in the following diagram.



LS owns a patented recycling process that transforms household trash (MSW) into a manufactured aggregate called MSWagg<sup>™</sup>, suitable for replacing virgin coarse aggregate in various construction applications. Today there are four methods to address MSW: source reduction, recycling, incineration, or landfill. The first two will continue to increase their contributions to the overall solution to MSW accumulation; however, MSW not addressed by those methods has historically not been cost-effective to utilize due to the organics and contamination present. According to IEA Bioenergy, landfilling produces approximately 154 pounds of methane per ton or a 100-yr global warming potential of 4312 pounds of CO₂/ton. Landfills range from 30-55% biodegradable and contribute 16% of global methane emissions annually. The MSWagg<sup>™</sup> process will produce an estimated 56 lb of CO₂/ton of organic matter, divert useful plastics to efficient recycling. With optimization, LS's process could potentially become a carbon-neutral process.

**Technical feasibility:** Louis Structures' technical methodology removes all chemicals of concern and contaminants in MSW. Processing MSW into an aggregate that meets EPA and DOT standards is achieved by solubilization, suspension, dewatering, dilution, encapsulation, and sequestration. Stringent regulatory requirements are required to meet beneficial reuse acceptance of MSWagg in the construction industry. Louis Structures recently submitted an EPA contract application with UW-Oshkosh and Rohde Brothers /PAWL Group engineering (Plymouth, WI), which will further characterize MSWagg's process and product for uses in multiple industries.

LS has commercial potential in three areas: 1) Receiving MSW from disposal companies that would ordinarily dump the MSW in landfills. 2) Recovering recyclables from the MSW and selling them to commodities buyers. 3) Selling residual MSW converted to MSWagg™ to construction and road contractors as an environmentally friendly alternative to virgin aggregate.

The owners of the N3773 Garden Parkway property have kindly suggested their facility could be a site suitable to demonstrate our process at a pilot scale, potentially house a longer-term, processing program for some area municipal solid waste feeds during the weekdays. Picture #1 shows a greed circled building which currently has large boilers and industrial tanks for water processing where material could be brought directly into the building via large windows on one end of the building. The outgoing product, once made into MSWagg could leave the building via conveyors loading dump trucks. A skid-loaded pretreatment system for water effluent from our

hydrothermal system is planned and a air quality compliant bag-house will be installed. The entire process will be conducted indoors and should pose no imposition to the usage of surrounding buildings or their visitors. The site is well-secluded and barred off to entry except those authorized to visit.

Please process our Chapter NR502 application. We are eager to get started with a pilot facility. We've been working up to this moment for over 5 years now. Please also see the included DNR recommendation (at the end of this document) we recently received delineating our potential pilot work with area landfills in need of drainage aggregate (up to 40,000 tons per year or more) in landfill cell construction that are newly beginning constructed in 2023 and beyond.

Regards,

## Benjamin Louis Horvat



Save... Print... Clear Data

State of Wisconsin Department of Natural Resources Box 7921, Madison WI 53707-7921 dnr.wi.gov

## Chapter NR 502 Non-Landfill Solid Waste Facility Initial Site Inspection (ISI) Application

Form 4400-209 (R 10/15)

Notice: Under NR 502.04(2), Wis. Adm. Code, an owner or operator of facilities listed in Section II of this form is required to submit a request for an Initial Site Inspection (ISI) to the Department of Natural Resources before establishing or expanding a solid waste facility. This form contains information needed for an ISI request. Personal information collected will be used for administrative purposes and may be provided to requesters to the extent required by Wisconsin's Open Records Law [ss. 19.31-19.39, Wis. Stats.]

Instructions: The applicant should submit, at a minimum, the following to request an Initial Site Inspection:

1. A cover letter requesting the ISI along with a brief description of the proposed solid waste facility design and operation.

2. A completed copy of this form.

3. All pertinent attachments identified in Section V of this form

15. at least 5,000 ft. from any piston airport runways?

Send two copies of the application packet (cover letter, completed form and attachments) to the Solid Waste Program Supervisor at the DNR's Regional Office where your facility is located. Submit one electronic copy to the same address. Section I - Facility Information First Name MI Title Applicant Last Name Founder / CEO Horvat Beniamin L Phone Number (with area code) Mobile Phone (with area code) **Email Address** Same benjamin@louisstructures.com 262-721-7207 Company/Municipality Name Facility Location (Street Address, Fire lane #) Louis Structures LLC N3773 Garden Parkway, Sheboygan Falls, WI County OVillage Legal Description of Property C Town OE 1/4 of Section 1/4 of N, R of Sheboygan OW Present Land Use on the Property: (select all that apply) Residential Other (specify): Has the local government for facility been notified of your intentions for development of this Solid Waste facility? ONo OYes Will the proposed facility design capacity be less than 100 tons per day? OYes ONo Section II - Proposed Solid Waste Facility (select the appropriate facility) Group A: Outside Storage, NR 502.05 OLess than 50 tons/day Storage, NR 502.05(3)(k) Outside Processing, NR 502.08 Group B: OTransfer, NR 502.07 OLess than 50 ton/day Transfer, NR 502.07(2r) Group C: ONon-Exempt Compost NR 502.12 Less than 20,000 cy Yard Residuals Composting, NR 502.12(6) Less than 5,000 cy Source-Separated Compostable Material Composting, NR 502.12(7) Group D: Group E: OIncinerator, NR 502.09 Group G: OWoodburning, NR 502.11 Group F: Group H: OAir Curtain Destructor, NR 502.10 OMunicipal Solid Waste Combustor, NR 502.13 No Group, Solid Waste Facilities that cannot be located in a floodplain, but are not subject to other locational criteria. (Go to Section IV) Olnside Infectious Waste Storage, NR 526.09 Inside Processing, NR 502.08(3)(b) Solid Waste Facilities that are not subject to specific locational criteria. (Go to Section IV) Non-Commercial Soil Borrow Site for the construction of a non-landfill solid waste facility, NR 502.04(2)(a)9 Click on the Y or N to select Section III - Locational Criteria (Circle the appropriate responses corresponding to the facility Group above) В Will the proposed facility be located: C F н / N 1. outside a designated floodplain? Y / N Y / N Y / N Y / N Υ 1 Υ Y / Y / N 2 2. at least 250 ft. from any private water supply wells? / N Y / N Y / N / N Y / N Y / N Y / N 3 3. at least 1,200 ft. from any public water supply wells? Y / N Y / N Y / N Y / N Y / N Y / N Y / N Y 1 4 Υ 4. at least 5 ft. from seasonal high groundwater table? NA NA / N Υ / N NA NA NA NA 5. at least 250 ft. from navigable lakes, ponds or flowage? 5 Y / N Y / N NA Y / N NA Y / N / N NA 6 NA Y / N 6. at least 500 ft. from navigable lakes, ponds or flowage? NA NA NA 7. at least 250 ft. from navigable rivers and streams? Y / N Y / N Y / N Y / N NA Y / N / N NA 8. at least 100 ft., from property line? Y / N Y / N NA Y / N NA Y / N NA NA 8 If no, describe Screening used 9. at least 250 ft., from property line? NA Y / N NA NA NA NA NA Y / N 9 If no, describe Screening used 10. at least 1/4 mile from any resident who has not provided written 10 NA NA NA NA NA Y / N Y / N NA consent to the DNR? 11. at least 1,000 ft. from highway or parks without screening? Y / N NA Y / N Y / N Y / N Y / N Y / N Y / N 11 If no, describe Screening used: 12. outside the limits of fill of an existing or abandoned landfill? NA 12 NA NA NA NA / N NA NA 13. Will putrescible waste be accepted? If Yes, will the facility Y / N Y / N Y / N Y / Y / N N 13 NA NA be: Y / N 14. at least 10,000 ft. from any turbojet airport runways? Y / N / N Y / N Y / N / N NA NA

15

Y / N

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Section III - Locational Criteria (Circle the appropriate	erespons	es corre	spon	din	g to	the	fac	cil	ity	G	rouj	o abo	ve)			
16. operated in a manner to not create a substantial bird hazard?	16	6 Y / N	Υ /	Ν	Y /	Ν	Y	1	Ν	Υ	/ N	N	IA	NA	Y	/ N
Section IV - Performance Standards (ss. NR 502 04(1	) and (2)(b	)6 Wis. /	٩dm.	Co	de)	Se	lect	t ti	1e	ар	pro	priate	e resp	onse	·.	
Will the proposed solid waste activity cause:													v	$\bigcirc$		
1. a detrimental effect on any surface water?													Y / (	$\mathbb{R}$		
<ol><li>an impact on any wetlands? (If the facility will impact</li></ol>	a wetland,	ch. NR 1	.03 a	ppli	es.)								Υ/	$\stackrel{\mathbb{R}}{\sim}$		
3. a detrimental effect on groundwater quality?													Y / (	N)		
4. a detrimental impact on groundwater quality or a ch. I	NR 140 gro	undwate	r qua	lity :	stand	lard	l to	be	e e>	(CE	ede	ed?	Y / (	N)		
5. a significant adverse impact on critical habitat areas?													Y/(	N)		
6. concentration of explosive gases which exceed 25% structures, soils or air beyond the facility property bound	dary?	r explosi\	e lim	it fo	rsuc	h g	ase	es	in				Y/ (	<u>₩</u>		
Section V – Attachments (s. NR 502 04(2) Wis. Adm. C																
The following supporting documents are provided with this I		•	-													
<ol> <li>A regional map or aerial image with 1" = 500' minimum so identified. This document should have markings outlinin boundary, surface waters, floodplains, public parks, road labeled.</li> </ol>	g a ¼ mile	radius ar	ound	the	prop	ose	ed f	ac	ility	′. T	he i	propo	sed fa	acility	prop	row erty
A site plan that shows the layout of the proposed site would document would have markings outlining the limits of the drainage patterns and control structures within the proposed site.	e proposed															er
Documentation that you believe supports and justifies the or "yes" in Section IV (select the appropriate box):     a. Not Applicable	eria (quest	ions #1-1	5) ex	emp	otion	req	ues	st(s	s) a	itta	ache	ed		ction	III ab	ove
b. Not Applicable OYes: Section IV Performance S	standards (	questions	#T-0	) ex	етр	uor	rec	qu	esi	(S)	alla	acneu	1			
Section VI – Applicant Certification certify that, to the best of my knowledge, the information prequirements in ch. NR 502, Wis. Adm. Code:	rovided her	ein is acc	urate	an	d was	s pı	epa	are	d ii	n c	com	plianc	e with	n all ap	plica	able
Authorized Representative ( <i>Print</i> ) Title Telephone									none N	Numbe	er					
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Benjamin Louis Horvat Four Applicant Mailing Address	idei / Ci	City					_				S	tate	ZIP (			_
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Preliminary Opinion based upon department review of submitted information:
The facility, as proposed, appears to meet all the applicable performance and location standards.
The facility, as proposed, has some conflicts with performance and location standards. Sufficient information has been provided to demonstrate, circumstances which warrant exemptions from those standards.
The facility, as proposed, does not appear to meet applicable performance and location standards. Insufficient information has been provided issue exemptions from those standards. If the project is pursued, the applicant will need to address these issues.
Plan of Operation Status for this facility:
The facility type identified in Section II does not require department approval of a Plan of Operation Report.
OA Plan of Operation has been submitted and reviewed. A Plan of Operation Approval is part of the ISI response.
A submitted Plan of Operation Report has not provided adequate information for the department to issue a decision at this time. Additional information will need to be submitted prior to the Department issuing a determination.
A Plan of Operation Report has not been submitted. To pursue this proposal a plan of operation must be submitted as specified in applicable sections of ch. NR 502, Wis. Adm. Code.

