Countywide Recycling & Disposal Facility
Division of Republic Waste Services of Ohio
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January 4, 2008

Ohio Environmental Protection Agency, Central Office
Division of Solid and Infectious Waste Management
Attn: Mr. Ed Gortner
PO Box 1049
Columbus, Ohio 43216-1049

RE: SOUTH SLOPE INVESTIGATION
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

Based on the observations made by you and by our inspector during the drilling of gas monitoring probe SGP-6, we share your interest regarding the conditions in, and under, the buttress at the south slope. We are presently planning an investigation, the first stage of which will likely consist of a geophysical investigation. We are searching for a reputable contractor who can mobilize as soon as possible with the goal of starting within two weeks of the date of this letter.

As you know, during 2006, we had observed slope movement and leachate outbreaks which were caused by the initial aggressive phase of the reaction. We were compelled to quickly take action to arrest the slope movement, gas and odor migration and leachate outbreaks. These actions included measures to control leachate outbreaks within the facility boundary (as required per Rule 3745-27-19(K)(1)), placement of temporary capping, and the addition of soil at the toe of the south slope to arrest movement at the toe in accordance with the terms of Ohio EPA's December 29, 2006 letter.

During the slope movement we observed a slow, measured downslope creep of material in the upper part of the slope accompanied by a sloughing/bulging at the toe (for which direct measurements were obscured by ongoing additional soil placement). As a result of this movement, we have previously acknowledged that it is possible that some waste was displaced over the permitted limits of waste (conversations in Fall 2006 and Summer 2007, and letter dated July 23, 2007). However, given the importance of maintaining the stability of this slope and the role of the soil buttress in doing so, we continue to believe that any significantly disruptive activities in this area may be premature in light of the ongoing reaction. Therefore, both the investigative techniques and any remedial actions that we will pursue in the near term will take this concern into consideration.

As soon as we have identified a contractor that can complete a geophysical investigation of this area, we will communicate the specifics of the program and schedule we plan to implement. In the meantime, the following should be noted:

- Any waste materials that may be present past the permitted limits of waste are encapsulated by a combination of low permeability soil and plastic materials,
- Drains placed under, and at the toe of, the buttress during its construction appear to be functioning adequately based on the apparent lack of liquids expressing or exerting pressure at the toe of the slope cap,
- We believe that, following investigation, additional temporary enhanced liquid collection between the permitted edge of waste and the toe of the buttress may be proposed to minimize any potential for environmental impact,
- We are committed to ultimately removing the cap from the area, removing the buttress material (including any waste materials), regrading the slope, and final capping the area. However, as related to you previously, we think that would best be done after the reaction conditions have subsided and we are confident that stability will not be compromised by such activities.

Please feel free to call me should you have any questions.

Tim Vandersall, P.E.
General Manager

ec: Clarke Lundell, Republic
Todd Hamilton, CWRDF
Jason Perdion, B&H
Mike Beaudoin, Earth Tech
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