



State of Ohio Environmental Protection Agency

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MAY 19 2008

Tim Vandersall
General Manager
Countywide RDF
3619 Gracemont Ave. SW
East Sparta, Ohio 44626

Dear Mr. Vandersall:

This letter regards Countywide's proposed plan for ambient air dioxin and furan sampling, and Countywide's ongoing VOC (volatile organic compound) sampling. Before Ohio EPA can approve Countywide's February 22nd, 2008 "Plan for Sampling for Polychlorinated Dibenzo-p-Dioxins and Dibenzofurans in the Vicinity of Countywide Recycling and Disposal Facility," which plan was required by the Director's Findings and Orders of February 7th, 2008, Countywide must make the following revisions:

Power Source for Dioxin/Furan Samplers. While battery power may have sufficed for the sampling to date, dioxin sampling equipment will require a dedicated electrical line to reliably power the sampling equipment. Therefore, a permanent source of electrical power should be added to all sampling sites.

Securing Sampling Sites. The original physical requirements for the ambient air monitoring sites are set forth in Bryan Zima's letter to Jason Perdion concerning "Ambient Air Monitoring at Countywide Landfill" dated March 28th, 2007. The letter specified that "all sampling sites shall be secure (fenced, or on a roof top, etc.), and have a reliable source of power." Currently, sites not located on rooftops have not been placed within fenced, or otherwise secured, areas. Although there may have been discussions with Ohio EPA staff at a March 31, 2008 sampling site visit as to whether security fencing was necessary, as a result of further internal discussions, Ohio EPA has concluded that some type of security fencing will be needed. Such fencing will not only help ensure that no current or future sampling equipment is tampered with, but will also protect the dedicated power source outlet that will be needed at each sampling site.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Select a different site for the "background" dioxin/furan sampling site, different than the site currently proposed by Countywide. The "background" site is required to help assess the contribution of dioxins and furans from motor vehicle traffic on the nearby interstate highway. Ohio EPA's concern with the currently proposed site is that it may also be influenced by industrial development. We would like a different "background" site to be chosen south of the landfill, where there is less industrial development. The site should continue to meet the other conditions of the February 7, 2008 Findings and Orders.

Sampling Site Placement. Recent field visits have raised some concerns about the placement of one sampling site. Although the concerns largely relate to VOC sampling, Ohio EPA believes the time to make adjustments is now, before dioxin/furan samplers are installed. At the Gracemont Street site the sampler is located near an oil well that could emit volatile organic compounds and skew sampling results towards nonrepresentative high readings. At the March 31 site visit it was stated by representatives of Countywide or Lawhon & Associates that the well is "inactive." However, current well inactivity will not necessarily eliminate the chance that VOC emissions could escape from any residual oils in the tank or that the well could become active again. Ohio EPA staff's preference is that the sampling equipment be moved 100 yards from the tank. If obstacles prevent moving the site that far, then sampling equipment should be moved at least 50 yards from the well.

Landfill representatives also mentioned the possibility of moving the sampling site currently located atop the elementary school. If Countywide does decide to move that site, Countywide should submit to Ohio EPA in the revised plan documentation of the location of the new site.

Submittal of a revised plan. Please submit a revised "Plan for Sampling for Polychlorinated Dibenzo-p-Dioxins and Dibenzofurans" that addresses the above matters within 15 days following receipt (by electronic mail or other means) of this letter.

VOC Sampling

VOC sampling quality assurance and quality control (QA/QC). In addition to dioxin/furan sampling, the February 7, 2008 Findings and Orders also required Countywide to conduct collocated sampling of volatile organic compounds. That sampling has been completed, and the results of analyses show that there are differences in results that lie outside expected and acceptable margins. As a result, Ohio EPA requests that Countywide do the following:

1. Within seven (7) business days from receipt (by electronic mail or other means) of this letter, send to Phil Downey, Ohio EPA, 50 West Town Street, P.O.

Box 1049, Columbus, Ohio 43216-1049, any field quality assurance (QA) data for field ambient air samples already collected by either Countywide or Lawhon or other consultant hired by Countywide. Field QA data would include items such as analyses of field blanks or trip blanks.

2. Within seven (7) business days from receipt of this letter, send to Phil Downey, Ohio EPA, any lab QA data generated by Countywide or Lawhon or other consultant hired by Countywide. Such data would include records of checks of the canisters after cleaning that would have been performed prior to the next sampling event.
3. Within ten (10) business days from receipt of this letter, send to Phil Downey, Ohio EPA, a Quality Assurance Project Plan (QAPP) with defined data quality objectives, operational sampling procedures, siting criteria for the sampling locations, site locations and definitive procedures for the set-up of the sampling equipment. The QAPP should include field QA criteria that Countywide or its contractor will report quarterly to Ohio EPA. Field QA procedures should include collocated samples, duplicates and field blanks.
4. Employ a reference lab to verify all sampling and analytical procedures, including laboratory quality control (QC). Periodically, but no less often than monthly, samples should be reanalyzed by the reference lab, or duplicate samples should be provided to, and analyzed by, the reference lab. Results for the comparison of sample results will need to meet a specific acceptable range of comparability. Specifically, the results of collocated and duplicate samples should compare within 25% for at least 50% of the target compounds detected.
5. After the QAPP has been approved by Ohio EPA, Ohio EPA staff will again visit all sampling locations, inspect sampling apparatus and observe sampling procedures. Countywide must implement any additional recommendations by Ohio EPA staff. Ohio EPA will review proficiency reports for analytical lab and Ohio EPA personnel will periodically visit sampling sites to observe sampling procedures.
6. Within ten (10) business days from receipt of this letter, install and operate at the cell tower sampling site or other site approved by Ohio EPA a meteorological station with wind speed and wind direction sensors. Monthly, data from the station shall be sent to Phil Downey, Ohio EPA. Data should be suitable for generating wind roses and for correlating with sampling results.

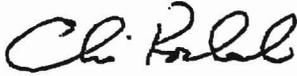
Guidelines for sampling setup. Although not necessarily bearing on differences in sampling results revealed as a result of collocated sampling, Ohio EPA recommends that future VOC sampling follow guidelines set forth by the United States Environmental Protection Agency in 40 C.F.R. Part 58, Appendix E (7-1-

Tim Vandersall
General Manager, Countywide RDF
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07 Edition), and the requirements for sampling for VOCs and ozone precursors.

Thank you.

Sincerely,



Chris Korleski
Director

Cc: Paul Koval, DAPC, OEPA
Phil Downey, DAPC, OEPA
Jennifer Kurko, NEDO, OEPA
Dan Aleman, Canton City Health Dept.
Ed Gortner, DSIWM, OEPA