



State of Ohio Environmental Protection Agency

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December 30, 2008

Tim Vandersall
General Manager
Countywide Recycling and Disposal Facility (RDF)
3619 Gracemont Street S.W.
East Sparta, OH 44626

RE: December 22, 2008 Request to enlarge frequencies and modify parameters

Dear Mr. Vandersall:

Ohio EPA is in receipt of Countywide Recycling and Disposal Facility's (Countywide) December 22, 2008 request for certain adjustments to Order 4 of the March 28, 2007 Director's Final Findings and Orders. Pursuant to Order 4.D. of the Director's Final Findings and Orders that were issued on March 28, 2007, I have been authorized to inform you that Ohio EPA agrees to your request for enlarging the frequencies of the following parameters and associated provisions of the March 28, 2007 Orders. Please attach this letter to the March 28, 2007 Orders and comply with the following new language for each respective order:

Adjustment 1.

Countywide has requested to adjust the original language contained in Order 4.A.6. of the March 28, 2007 Orders which states:

6.) *Weekly field measurements of the following parameters and constituents in all gas extraction wells servicing cells 1, 2, 3, 4A, 4B, 5A, 5B, 5C, 5D, and 6A:*

- *Initial and adjusted temperature;*
- *Initial and adjusted pressure;*
- *Initial and adjusted flow rate (at wells having flow measurement devices installed);*
- *Concentrations of methane;*
- *Concentrations of carbon dioxide; and*
- *Concentrations of oxygen.*

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

After careful review of Countywide's request and pursuant to Order 4.D. of the March 28, 2007 Orders, Ohio EPA agrees that Order 4. A.6. of the March 28, 2007 Orders may be adjusted as follows:

- 6.) Weekly field measurements of the following parameters and constituents in all gas extraction wells servicing cells 1, 2, 3, 4A, 4B, 5A, 5B, 5C, 5D, 6A, 7 and 8A:
- Initial and adjusted temperature;
 - Initial and adjusted pressure;
 - Initial and adjusted flow rate (at wells having flow measurement devices installed);
 - Concentrations of methane;
 - Concentrations of carbon dioxide; and
 - Concentrations of oxygen.

Adjustment 2.

Countywide has requested to adjust the original language contained in Order 4.A.7. of the March 28, 2007 Orders which states:

- 7.) *Unless Respondent submits a Work Plan detailing an alternative approach for obtaining temperature and carbon monoxide, which is approved by Ohio EPA in writing, Respondent shall, at a minimum, sample all landfill gas extraction wells at the Facility with temperatures exceeding 150° F. in accordance with the following requirements:*
- *Respondent shall divide the total number of landfill gas extraction wells with temperatures greater than 150° F. into two subsets and shall alternate the sampling of each subset every two weeks;*
 - *Respondent shall obtain vertical temperature analysis in 10 foot increments with each increment recorded and the highest recorded temperature and depth specifically highlighted. Respondent shall obtain sufficient data to yield a vertical temperature profile for each landfill gas extraction well; and*
 - *Respondent shall obtain and submit carbon monoxide samples for laboratory analysis in accordance with the sampling frequency identified above for each landfill gas extraction well.*

Respondent shall conduct this activity in a manner to minimize odors to the greatest practical extent. Nothing in these Orders shall be construed as a modification of, or approval of, a higher operating level for nitrogen, oxygen, or temperature under New Source Performance Standards (NSPS) regulations at 40 C.F.R. 60.750 to 60.769.

After careful review of Countywide's request and pursuant to Order 4.D. of the March 28, 2007 Orders, Ohio EPA agrees that Order 4.A.7 of the March 28, 2007 Orders may be adjusted as follows:

- 7.) Respondent shall, at a minimum, monthly monitor all accessible gas extraction wells servicing cells 1, 2, 3, 4A, 4B, 5A, 5B, 5C, 5D, 6A, 7, and 8A for a vertical temperature profile, depth to liquid level, and depth to bottom of well at the Facility in accordance with the following requirements:
- Respondent shall divide the total number of landfill gas extraction wells into two subsets and shall alternate the monitoring of each subset every two weeks;
 - Respondent shall obtain vertical temperature analysis in 10 foot increments with each increment recorded and the highest recorded temperature and depth specifically highlighted. Respondent shall obtain sufficient data to yield a vertical temperature profile for each landfill gas extraction well;
 - Respondent shall obtain depth to liquid levels and depth to the bottom of the well in accordance with standard practices; and
 - Respondent shall report the results obtained under this Order to Ohio EPA within 30 days after obtaining the measurements.

Respondent shall conduct this activity in a manner to minimize odors to the greatest practical extent. Nothing in these Orders shall be constructed as a modification of, or approval of, a higher operating level for nitrogen, oxygen, or temperature under New Source Performance Standards (NSPS) regulations at 40 C.F.R. 60.750 to 60.769.

Adjustment 3.

Countywide has requested to adjust the original language contained in Order 4.A.8. of the March 28, 2007 Orders which states:

- 8.) *Twice per month laboratory gas analysis of each gas extraction well exhibiting temperatures greater than 150° F or CO readings greater than 100 ppmv using USEPA methods as follows:*
- *VOCs and all other appropriate analytes detected by TO-15; hydrogen, acetylene and ammonia using ASTM-D4490; and methane using ASTM D1946, or any other appropriate alternative testing methodologies approved by Ohio EPA in writing.*

After careful review of Countywide's request and pursuant to Order 4.D. of the March 28, 2007 Orders, Ohio EPA agrees that Order 4.A.8 of the March 28, 2007 Orders may be adjusted as follows:

- 8.) Monthly laboratory gas analysis of each gas extraction well exhibiting temperatures greater than 150° F. and at the inlet of each operating explosive gas extraction system flare using the methods as specified below:
- VOCs and all other appropriate analytes detected by method TO-15; hydrogen, acetylene, carbon monoxide, and methane using ASTM D-1946; and ammonia using Dräger™ tubes, or any other appropriate alternative testing methodologies approved by Ohio EPA in writing.

Adjustment 4.

Countywide has requested to adjust the original language contained in Order 4.A.11. of the March 28, 2007 Orders which states:

- 11.) *Monthly laboratory gas analysis of each gas extraction well exhibiting temperatures greater than 170° F or CO readings greater than 100 ppmv using USEPA methods as follows:*
- *SVOCs and all other appropriate analytes detected by TO-13A; polynuclear aromatic hydrocarbons (PAHs) and all other appropriate analytes detected by TO-13A; and chlorinated dibenzo p-dioxins (PCDDs) and chlorodibenzofurans (PCDFs) using TO-9, or any other appropriate alternative testing methodologies approved by Ohio EPA in writing.*

After careful review of Countywide's request and pursuant to Order 4.D. of the March 28, 2007 Orders, Ohio EPA agrees that Order 4.A.11 of the March 28, 2007 Orders may be adjusted as follows:

- 11.) Monthly laboratory gas analysis of each gas extraction well exhibiting temperatures greater than 200° F and at the inlet of each operating explosive gas extraction system flare using the methods as specified below:
- SVOCs and all other appropriate analytes detected by TO-13A; polynuclear aromatic hydrocarbons (PAHs) and all other appropriate analytes detected by TO-13A; and chlorinated dibenzo p-dioxins (PCDDs) and chlorodibenzofurans (PCDFs) using TO-9, or any other appropriate alternative testing methodologies approved by Ohio EPA in writing.

In the event that the total dioxins and furans (mathematical sum of Total TCDD, Total TCDF, Total PECDF, Total HXCDD, Total PECDD, Total HPCDD, Total HPCDF, Total HXCDF, OCDD, and OCDF) exceeds 200 picograms (10 ng/m³ or 10,000 pg/m³) at the inlet of each operating flare, a Dioxin/Furan Source Assessment Program shall be undertaken to determine the source of the elevated dioxins and furans. The Dioxin/Furan Source Assessment Program shall utilize the data collected pursuant to Orders No. 4.A.1, 4.A.2, 4.A.3, 4.A.4, 4.A.6, 4.A.7, 4.A.8, 4.A.10, and 4.A.11 of the March 28, 2007 to assess the source of the elevated dioxins and furan compounds. If necessary, additional sampling for TO-9 and TO-13 parameters may be performed (as specified in Order 4.A.11) in the suspected source well(s) and/or in branch headers, working back toward explosive gas wells until the source well(s) can be identified with reasonable certainty.

Adjustment 5.

Countywide has requested to adjust the original language contained in Order 4.A.12. of the March 28, 2007 Orders which states:

- 12) *Monthly laboratory chemical analysis of grab samples obtained from the Respondent's collection points within the Leachate Collection System servicing cells 1, 2, 3, 4A, 5A, 5B, 5C, 5D, and 6A including the following parameters and constituents:*
- *OAC Rule 3745-27-10 Appendix I (VOCs, metals, and non-metal inorganics utilizing appropriate SW-846 methods);*

After careful review of Countywide's request and pursuant to Order 4.D. of the March 28, 2007 Orders, Ohio EPA agrees that Order 4.A.12 of the March 28, 2007 Orders may be adjusted as follows:

- 12) Quarterly laboratory chemical analysis of grab samples obtained from the Respondent's collection points within the Leachate Collection System servicing cells 1, 2, 3, 4A, 5A, 5B, 5C, 5D, and 6A including the following parameters and constituents:
- OAC Rule 3745-27-10 Appendix I (VOCs, metals, and non-metal inorganics utilizing appropriate SW-846 methods);

Adjustment 6.

Countywide has requested to adjust the original language contained in Order 9. of the November 7, 2007 Orders which states:

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General Manager
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- 9) *Beginning 31 days after the effective date of these Orders, and continuing monthly thereafter until the March 2007 Orders are terminated, Respondent shall sample the soil gas survey monitoring probes required by Order No. 8 above for methane, hydrogen, carbon monoxide, and carbon dioxide, as well as the chemicals identified in Order 4.A. of the March 2007 Orders, and report the resultant data to Ohio EPA within 35 days after the sampling event.*

After careful review of Countywide's request and pursuant to Order 7. of the December 31, 2007 Orders modifying the November 7, 2007 Orders by adding Section XII. In-Field Adjustments, Ohio EPA agrees that Order 9. of the November 7, 2007 Orders may be adjusted as follows:

- 9) Beginning 31 days after the effective date of these Orders, and continuing monthly thereafter until the March 2007 Orders are terminated, Respondent shall sample the soil gas survey monitoring probes required by Order No. 8 above for methane, oxygen, pressure and carbon dioxide and report the resultant data to Ohio EPA within 35 days after the sampling event.

If you have any questions regarding this letter, please feel free to contact me at (614) 644-2621, or by email at ed.gortner@epa.state.oh.us.

Sincerely,



Ed Gortner
Environmental Supervisor
Ohio EPA-DSIWM

EG/sw

cc: CO Civil Enforcement Files
Jeff Hurdley, Legal
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Pam Allen, DSIWM-CO
Kurt Princic, DSIWM-NEDO
Kirk Norris, Stark County Health Department

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