

**Countywide Recycling & Disposal Facility**

Division of Republic Waste Services of Ohio
3619 Gracemont Street S.W.
East Sparta, Ohio 44626
Phone: 330-874-3855
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April 13, 2007

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: REQUEST FOR DETERMINATION AND EXTENSION, ORDER 6.B
AIR PERMIT APPLICATION FOR BACKUP GENERATORS
DIRECTOR'S FINAL FINDINGS AND ORDERS OF MARCH 28, 2007
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

Countywide Recycling and Disposal Facility (Countywide) is required by Order 6.B to:

"Begin installation and after installation keep available for immediate operation, generators with sufficient power-generating capacity to operate, without interruption, the landfill gas collection and control system in the event of a failure of the primary source of power for that system. Respondent shall complete installation of backup generators not later than 60 days after the effective date of these Orders."

Countywide has determined that, to meet the requirements of Order 6.B, three backup generators will be necessary. Each of these three backup generators will only need to be used in an emergency situation. As such, we believe that they meet the requirements of the permit-by-rule exemptions in OAC Rule 3745-31-03 (A)(4)(b) (emergency electrical generators). The generators will operate for less than 500 hours per year). Therefore, Countywide intends to follow the general provisions requirements of (OAC) Rule 3745-31-03 (A)(4) by maintaining records and submitting the notification to Ohio EPA to satisfy the additional requirement of Order 6.B which states:

"Respondent shall also submit to Ohio EPA, not later than 30 days after the effective date of these Orders, the appropriate permit application, permit modification application, or notification required by OAC Chapters 3745-31 and 3745-77 for the backup power equipment installed pursuant to the requirements of these Orders. An extension of the specified application deadline date may be granted if Respondent submits written justification, two weeks prior to its due date, and if the Director concurs in writing."

Furthermore, we respectfully request an extension to the thirty (30) day permit application requirement of Order 6.B. Countywide proposes to submit the application within sixty (60) days of the effective date of the Orders. The requested extension would allow Countywide time to identify the lowest emission unit practical (e.g. electronic-controlled starts to allow use of smaller horsepower units).

Please note that, whatever your determination, this exemption or extension request will not impact the installation schedule for the backup generators. We will meet the requirement of Order 6.B by having backup generators in place within 60 days of the effective date of the Orders.

Please call me if you have any questions.



Todd K. Hamilton, P.E.
Area Engineer

cc: Bill Skowronski, OEPA-NEDO
Kirk Norris, SCHD
Dan Aleman, CHD
Todd Hamilton, CWRDF
Kyle Nay, Cornerstone
Mike Michels, Cornerstone
Mike Contestabile, Cornerstone
Jason Perdion, B&H
Jim Walsh, SCS Engineers



Countywide Recycling & Disposal Facility
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FACSIMILE TRANSMITTAL COVER SHEET

TO: Ed Gortner
OHEPA - Central Office

FROM: () TIM VANDERSALL () NANCY ELLIOTT
() JACK PALERMO () ESTHER VARADI
() LARRY ELLIOTT (X) LETTICIA WRIGHT
() TAMARA SANDS () SHANA CARMAN
() RANDY LANE () PAUL FINTON
() TODD HAMILTON () JIM STEIGERWALD
() _____

DATE: 4/13/07 NO OF PAGES: 2

SUBJECT: _____

COMMENTS: Hard Copy to Follow.

