



State of Ohio Environmental Protection Agency

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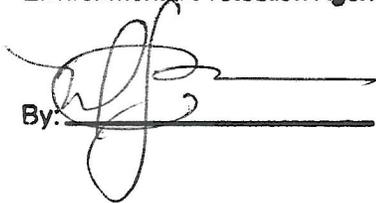
TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

P.O. Box 1049
Columbus, OH 43216-1049

October 1, 2007

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

Mr. Clarke Lundell
Republic Services, Inc.
Suite 2700
110 S. E. 6th Street
Fort Lauderdale, FL 33301

By:  Date: 10/1/07

ENTERED DIRECTOR'S JOURNAL

OCT - 1 2007

OHIO E.P.A.

RE: INSTALLATION OF FIREBREAK AS INTERIM FIRE SUPPRESSION MEASURE

Dear Mr. Lundell:

My staff and experts continue to evaluate the data submitted by Countywide Recycling and Disposal Facility (Countywide) pursuant to the March 28, 2007 Director's Final Findings and Orders (Orders). Analysis of this data, including carbon monoxide and carbon dioxide concentrations, explosive gas extraction well head and downhole temperatures, landfill settlement, formation and propagation of tension cracks, leachate outbreaks, odors, charred drilling waste, and other site observations leads me to conclude that the fire is migrating throughout the 88 acres and possibly into the expansion area (Cell 7). In an effort to prevent further spread of the fire and to avoid adding additional fuel (waste) to the fire, I believe installation of a firebreak is required to protect human health, safety and the environment.

Therefore, pursuant to Section V., Paragraph No. 9 of the Orders, which provides that I may select as a final action "a remedial action, or combination of remedial actions, that is designed to extinguish the fire at the Facility", I am selecting an interim remedial action that alters the filling plan for Cell 8B so that this cell is physically isolated from Cell 8A (the current working face), by a horizontal distance of at least the width of the existing berm between Cells 8A and 8B. Please see the attached cross section illustrating this interim remedial action.

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

Mr. Clarke Lundell
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The complete break in waste continuity required by the selected interim remedial action will be created without requiring waste excavation and will establish an Isolation Zone between Cells 8A and 8B so the fire cannot pass from one waste mass to another. Pursuant to this interim remedial action, Cell 8B can accept waste as an Isolated Working Cell that is not threatened by the existing fire in the 88 acres. Among other concerns, any firebreak that does not completely and physically separate the 88 acres from the current operating cell may result in the current working face and permitted expansion area being consumed by the fire. I believe the berm between Cells 8A and 8B will provide the necessary physical separation.

In addition, I am requiring as part of this interim remedial action that all disposal of waste cease in Cell 8A by October 15, 2007. Pursuant to Section XVII. of the Orders, Countywide waived "the right to appeal the issuance, terms and conditions, and service of these Orders, including but not limited to any rights" it may have to appeal "final actions issued by Ohio EPA pursuant to these Orders" selecting a remedial action. Please note that this is an interim remedial action designed to address the potential migration of the fire into the expansion area of the facility, and that I intend to select additional remedial actions to address conditions at the facility in the future. I am currently reviewing Countywide's completed FSP that was submitted to Ohio EPA for review and approval.

Unless otherwise authorized by Ohio EPA, Countywide has until October 15, 2007, to dispose of waste in Cell 8A. After that date Countywide may begin disposal of waste in Cell 8B provided that Countywide obtains all necessary authorizations. I understand that Countywide recently submitted its construction certification report for Cell 8B. Please know that I have instructed my staff to expedite the Agency's review of the construction certification report as well as all alteration authorizations necessitated by the change in filling operations. Because the change to filling in Cell 8B as opposed to Cell 8A after October 15, 2007, may result in a reduction in Countywide's currently available airspace, I strongly encourage Countywide to take the appropriate steps to preserve or extend the availability of its permitted airspace in Cells 8A and 8B before and after the October 15, 2007 deadline.

If Countywide wants to propose the construction of additional firebreaks at other locations within the facility, I am willing to consider such proposals; however, notwithstanding the construction of additional firebreaks, Countywide must proceed to implement this interim remedial action as detailed herein.

Mr. Clarke Lundell
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Please contact Ed Gortner or Pam Allen of my staff with any questions you have, or assistance you require, at 614-644-2621.

Sincerely,

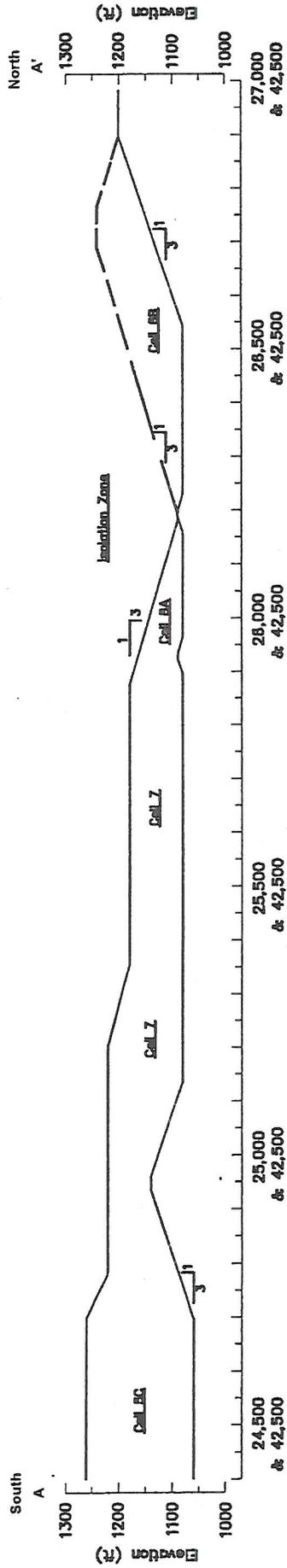
Handwritten signature of Chris Korleski in black ink, consisting of a stylized 'C' followed by 'Korleski'.

Chris Korleski, Director

CK/GG/sw

cc: DSIWM Civil Enforcement Files, CO
Ed Gortner, DSIWM-CO
Pam Allen, DSIWM-CO
Jeff Hurdley, Legal
Kurt Princic, DSIWM-NEDO
Kirk Norris, Stark County Health District
Tim Vandersall, Countywide RDF
Todd Hamilton, Countywide RDF

ec: Michael Beaudoin



Cells 5C, 7, 8A, & 8B
 Countywide Disposal & Recycling Facility By: Timothy D. Stark
 DATE: 08/24/2007