



State of Ohio Environmental Protection Agency

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October 12, 2007

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

**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.**

By: *Michael R. Shapiro* Date: 10/12/07

OHIO E.P.A.
OCT 12 2007
ENTERED DIRECTOR'S JOURNAL

Dear Mr. Lundell:

I am in receipt of Countywide's October 4, 2007 request to modify the October 15, 2007 deadline specified in my letter dated October 1, 2007. Initially, the October 15, 2007 deadline was set in consideration of the fact that a granular soil berm already existed between Cells 8A and 8B, providing a jump start for construction of the physical separation. The October 15 date was also selected based on conversations with you and Tim Vandersall about the timeframe Countywide needed before moving waste placement into Cell 8B. However, in the days after the October 1, 2007 letter, Ohio EPA staff learned that on September 25, 2007, Countywide deconstructed the granular soil berm located between Cells 8A and 8B. Ohio EPA now recognizes that the granular soil berm itself was placed on top of the leachate collection system, which is less than ideal for the purposes of a fire break.

In a meeting on October 8, 2007, my staff and experts learned that Countywide intends to replace the deconstructed granular soil berm with an enhanced and engineered re-compacted clay/low permeability berm (RCC Berm) that will result in complete separation of the waste and the leachate collection system in Cells 8A and 8B. Countywide has requested to modify the timeframe by an additional 30 to 45 days after receipt of the necessary Agency approvals that authorize filling in Cell 8B. This also affords time to acquire needed materials and considers construction timeframes. In light of the additional construction activity to create an enhanced RCC Berm and necessary Agency review and authorizations of the enhanced RCC Berm and other construction activities, I hereby modify the requirements of my October 1, 2007 letter in accordance with the following schedule:

A. Within 4 calendar days after receipt of this letter, Countywide shall submit to Ed Gortner, detailed design plans and specifications for an engineered RCC Berm that is to be located at the base of Cell 8A. The RCC Berm shall be suitable to ensure stability of the waste slope in both Cells 8A and 8B and shall result in the complete separation of the waste and the leachate collection system in Cells 8A and 8B. The RCC Berm shall be constructed of liner quality clay/low permeability soils, shall include a geosynthetics drainage composite as a leachate drainage over the top of the RCC Berm that is anchored in the existing intermediate soil cover in Cell 8A and the leachate

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

collection system in Cell 8B, and shall include appropriate synthetic and/or soil protection layers to protect the geosynthetic drainage composite. The detailed design plans shall further include a gravel bedded perforated leachate collection pipe to be installed at the north toe of the RCC Berm that shall run along the entire length of the RCC Berm and shall account for the installation of a leachate collection riser pipe(s) that will be located at the lowest elevation in Cell 8B for removal of leachate. Existing riser pipes shall continue to be used to remove leachate from Cell 8A.

B. Within 14 calendar days after Ohio EPA's approval of the detailed design plans identified in paragraph A. above, Countywide shall construct the RCC Berm, geosynthetic drainage composite and the protective layer, complete the installation of the leachate collection system riser pipes in Cell 8B, and submit a construction certification report to Ohio EPA for concurrence.

C. Within 22 calendar days after Ohio EPA's concurrence with the construction certification report, Countywide shall complete placement of the select waste layer within Cell 8B and shall cease all filling operations within Cells 7 and 8A in accordance with the following schedule:

1. By the end of week 1, a weekly average of not less than 15% of Countywide's total waste receipts shall be placed in Cell 8B and not more than 85% into Cells 7 and 8A;
2. By the end of week 2, a weekly average of not less than 50% of Countywide's total waste receipts shall be placed in Cell 8B and not more than 50% into Cells 7 and 8A;
3. By the end of week 3, a weekly average of not less than 75% of Countywide's total waste receipts shall be placed in Cell 8B and not more than 25% into Cells 7 and 8A. By calendar day number 22, Countywide shall not dispose of any waste in Cells 7 and 8A and 100% of Countywide's total waste receipts shall be placed in Cell 8B.

Please contact Ed Gortner or Pam Allen with any questions you have, or assistance you require, at 614-644-2621.

Sincerely,



Chris Korleski, Director
Ohio EPA

CK/EG/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