



Countywide Recycling & Disposal Facility

Division of Republic Waste Services of Ohio
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May 9, 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: WRITTEN DEMONSTRATION FOR GAS WELLS WITH OXYGEN EXCEEDANCES
ORDER 4.B.2, DIRECTOR'S FINAL FINDINGS AND ORDERS OF MARCH 28, 2007
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

On April 23, 2007 Countywide Recycling and Disposal Facility (Countywide) submitted a 14-day written demonstration for one (1) landfill gas (LFG) well which exhibited oxygen levels greater than the target level of 1.5% as required by Order 4.B. The purpose of this letter is to inform you that this LFG well has achieved compliance below the 1.5% oxygen target identified in the findings and orders within 30 days of the initial monitored exceedance.

The LFG well identified during the week of April 9, 2007 is noted in Table 1, below. Also noted in the table is the date in which compliance was achieved and the oxygen content.

Table 1
LFG Wells with Greater than 1.5% Oxygen During the Week of April 9, 2007
For Which A Written Demonstration was Required

| Well ID | Date of Initial Exceedance | Initial Oxygen Reading | Date of Compliant Oxygen Reading or Last Oxygen Reading | Compliant Oxygen Reading or Last Oxygen Reading |
|----------------|-----------------------------------|-------------------------------|--|--|
| PW-A1R | 4/9/2007 | 17.4% | 5/3/2007 | 0.0% |

Corrective actions were taken as described in Table 2, and this well achieved compliance once the de-watering pump sufficiently lowered liquid levels to expose the perforations in the well casing.

**Table 2
Corrective Actions Taken And Reason Mandated 1.5% Oxygen Content Not Achieved**

| Well ID | Corrective Actions Taken | Reason 1.5% Level Not Achieved |
|----------------|--|--|
| PW-A1R | Nominal vacuum adjustments, assessed well integrity and made repairs as appropriate, performed repairs on leachate pump installed in this LFG well | <i>Not applicable this well has achieved compliance with the 1.5% oxygen target. The leachate pump sufficiently lowered liquid levels in the well to expose perforations in the well casing.</i> |

A complete historical record of the corrective actions taken by Countywide for this LFG well was provided in the April 23, 2007 written demonstration. No additional corrective actions were performed to this LFG well to achieve compliance with the 1.5% oxygen target. A chronological listing of oxygen content readings taken for this LFG wells is provided in Attachment A.

Please note that if in the future this LFG well is not able to achieve the required 1.5% oxygen concentration, Countywide may still request alternate timelines for additional corrective actions or higher operating parameters, if necessary. In addition Countywide will continue to monitor this LFG well as required and continue working to achieve 1.5% or less oxygen concentration for this and all other LFG wells.

Please feel free to call me should you have any questions.



Tim Vandersall, P.E.
General Manager

Attachments:

Attachment A - Chronological Oxygen Content Readings

- 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

Attachment A
Chronological Oxygen Content Readings

Attachment A
Chronological Oxygen Content Readings

| GEM ID | As-built ID | Date Time | O2 % |
|---------------|--------------------|------------------|-------------|
| CNTYA01R | PW-A1R | 4/9/2007 15:08 | 17.4 |
| CNTYA01R | PW-A1R | 4/9/2007 15:11 | 16.6 |
| CNTYA01R | PW-A1R | 4/11/2007 14:24 | 20.2 |
| CNTYA01R | PW-A1R | 4/11/2007 14:26 | 19.6 |
| CNTYA01R | PW-A1R | 4/16/2007 10:20 | 16.8 |
| CNTYA01R | PW-A1R | 4/16/2007 10:22 | 16.6 |
| CNTYA01R | PW-A1R | 4/23/2007 15:24 | 7.4 |
| CNTYA01R | PW-A1R | 4/23/2007 15:26 | 6.1 |
| CNTYA01R | PW-A1R | 5/3/2007 11:00 | 0.1 |
| CNTYA01R | PW-A1R | 5/3/2007 11:04 | 0 |