



State of Ohio Environmental Protection Agency

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July 3, 2007

CERTIFIED MAIL

Mr. Tim Vandersall
General Manager/Engineer
3619 Gracemont St. S.W.
East Sparta, Ohio 44626

RE: Countywide Recycling and Disposal Facility (Countywide), 3619 Gracemont St. S.W., East Sparta, Ohio 44626, Stark County Incident Emergency Response Plan

Dear Mr. Vandersall:

The Ohio Environmental Protection Agency (Ohio EPA) has preliminarily reviewed Countywide's May 27, 2007 Incident Emergency Response Plan (IERP). Countywide submitted the IERP in partial fulfillment of its obligations pursuant to the March 28, 2007 Director's Final Findings and Orders (March 28, 2007 DFF&Os). The IERP cannot be approved as submitted. Please address the following comments:

General Comments:

- GC 1. Countywide needs to plan for the possibility of a catastrophic event and identify necessary resources to respond quickly and effectively. The IERP, as submitted, is very general and does not include an assessment of the numerous potential emergency events that may occur at the facility, such as surface fires, explosions, slope failure or failure of engineering components, significant air emissions, etc. Different emergency events may require different responses and resources. Please provide a listing of the potential emergency situations and how Countywide would respond in each event.
- GC 2. The IERP, as submitted, does not identify the potential health, safety, and environmental impacts of each emergency type and potential area(s) of impact (confined to site versus community impact). Please provide an assessment of the potential health, safety, and environmental impacts and how Countywide would respond to those impacts. Include potential short and long term impacts (odors, air emissions, surface water runoff, ground water contamination, community health issues, etc.).

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

GC 3. Two local fire departments are identified in the IERP as available responders. Depending on the emergency situation at the facility, local resources may not have the necessary personnel, training, or equipment to adequately respond. Please evaluate and identify additional resources that Countywide will utilize beyond the limited local resources, such as industrial contractors capable of responding to large-scale events. Countywide should also provide contact information regarding industrial contractors to the Stark County Emergency Management Agency (EMA), local fire departments, and other potential responders so that they are aware of other resources that would be available.

GC 4. Please clarify the lines of communication with media and the public. Page XV of the IERP indicates that Countywide will rely on 911 notification and two local radio stations to inform residents about any necessary evacuations. Page XXIII notes that the General Manager or the Operations Manager will contact outside agencies and resources. Please detail how Countywide will communicate information if an event does occur at the facility, including the initial report of an emergency event and ongoing updates.

Additionally, pre-event planning that includes a draft public relations plan helps establish good communication and fosters a cooperative relationship among everyone involved. Please clarify how Countywide will communicate with the media and the public to ensure that everyone is aware of the types of emergency events that could occur and what the potential impacts might be. Providing this type of information will allow local homeowners, government agencies, and potential responders to plan in advance and make necessary decisions to protect the community.

GC 5. The IERP does not discuss how Countywide would handle an interruption to normal business operations, should a catastrophic event occur at the facility. Please describe Countywide's contingency plan for local waste management if Countywide has to temporarily divert waste haulers from its facility while responding to an emergency event.

Specific comments:

SC 1. Page IV: Countywide has indicated that the IERP is a supplement to the facility's Emergency Action Plan. Please provide a copy of the Emergency Action Plan.

Countywide Recycling and Disposal Facility
Preliminary Comments on Incident Emergency Response Plan
Page 3

- SC 2. Page VIII: "Countywide will provide adequate controls and equipment that can be used to minimize or eliminate risk of injury to employees and the surrounding community in the event of an emergency." It is unclear what Countywide is stating. Please clarify this sentence.
- SC 3. Page X: The IERP lists numerous personnel with responsibility for contacting emergency responders. Please clarify who will contact each emergency responder and how Countywide will ensure that all necessary contacts are made.
- SC 4. Page XII: The telephone number listed for the Stark County EMA is incorrect. Please revise the IERP to list the Stark County EMA's number as (330) 451-3900. It would also be helpful to include the names and numbers for industrial contractors who would be willing and able to respond with equipment and trained personnel to address potential emergency situations.
- SC 5. Page XVI: The IERP discusses evacuation procedures for employees, but there are no procedures outlined for other individuals, such as contractors and visitors, who may also be at the facility. Please clarify who will be responsible for directing/escorting non-employees from the facility. Additionally, please identify what personal protection equipment is available to protect individuals against harmful exposures, if needed.
- SC 6. Page XXI: The IERP indicates that the facility has no critical operations to shut down. However, there are systems that may need to continue operating, even during an emergency. Please explain how Countywide will maintain systems such as the gas extraction system, gas flares, leachate collection lines/pumps, etc. What are the potential impacts if these or other systems are damaged or fail as a result of an emergency event at the facility?
- SC 7. Page XXII: The IERP discusses procedures to account for all employees during an emergency. However, there is no discussion about visitors at the facility. Please clarify how Countywide will ensure that all visitors will be accounted for should there be an evacuation of the premises.
- SC 8. Page XXIII: The IERP details who will meet to assess emergency situation and decide on course of action. However, a meeting location has not been designated in the plan. Please identify where the emergency meetings will occur. Consider a designated offsite location for group safety. Also consider including immediately in the discussions various public safety personnel (local EMA, fire, police, etc.) and local officials to be part of assessment efforts and decision-making about needed response efforts as soon as possible.

Countywide Recycling and Disposal Facility
Preliminary Comments on Incident Emergency Response Plan
Page 4

Pursuant to Section VI of the March 28, 2007 DFF&Os, the Incident Emergency Response Plan shall be revised to incorporate the above comments and submitted to Ohio EPA within 14 calendar days following your receipt of this letter. To facilitate review of the document, the revised document should be accompanied by a cover letter which indicates how and where each comment has been incorporated, including any indirect changes necessitated by these comments. Portions of the document not affected by these comments should remain unchanged.

Should you have any questions, please contact me at 614-728-5325, or contact Jeff Martin at 614-728-5360 or Gina Gerbasi at 614-728-5325.

Sincerely,



Ed Gortner
DSIWM Enforcement Coordinator, Ohio EPA
Division of Solid and Infectious Waste Management

EG/sw

cc: Chris Korleski, Director, Ohio EPA
Jeff Hurdley, Ohio EPA, Legal
Jeff Martin, Ohio EPA, DSIWM-CO
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