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August 22, 2007

Todd Hamilton and Tim Vandersall  
Countywide Recycling & Disposal Facility  
3619 Gracemont Street S.W.  
East Sparta, Ohio 44626

**RE: ADDITIONAL INCLINOMETER INSTALLATION AND SURFACE MONITORING  
ON THE WEST SLOPE**

Dear Mr. Hamilton and Mr. Vandersall:

I understand that Countywide has been unsuccessful installing inclinometers in accordance with Countywide's July 05, 2007 Inclinometer Installation Work Plan (Work Plan) as a result of certain site factors. The purpose of this letter is to convey Ohio EPA's position regarding the remaining inclinometer installation activities on the South Slope, as well as Ohio EPA's position regarding the installation of new inclinometers on the West Slope of the 88 Acres and the associated surface monitoring efforts.

It is my understanding that Countywide has successfully installed inclinometers INC-3, and INC-4 along Cross-Section 3 in the South Slope. Inclinometer INC-5 has not been installed in Cross-Section 3; however, I understand Countywide intends to install this inclinometer when the rotosonic drill rig returns to the site. Ohio EPA requests that INC-5 needs be installed no later than September 7, 2007.

Following several discussions with Dr. Stark, Ohio EPA recommends that Countywide forego the installation of the other three proposed inclinometers along South Slope Cross-Section 7 as identified in the Work Plan, and instead install two lines of inclinometers along the West Slope of the 88 Acres. Ohio EPA is concerned that the formation of tension cracks may indicate the potential for slope movement in the west area of the landfill. The appearance of tension cracks along the crest of the South Slope should not be taken lightly and needs to be evaluated in conjunction with the elevated temperature data in gas well PW-126 of 192 degrees in June, and carbon monoxide levels of nearby wells H1 of 2644 ppm-v and PW-167 of 5915 ppm-v in July, wells PW-126 at 995 ppm-v and PW-141 at 1388 ppm-v in June, and PW-156 of 1559 ppm-v in April. The West Slope inclinometers need to be installed between N24,000 and N24,700. In order to conduct this work, Countywide will need to amend its Work Plan to

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

account for this change in the scope of work and submit the Work Plan amendment to Ohio EPA for review and comment on the location, depth, and number of inclinometers. The revised Work Plan needs to include the plan view and detailed cross-sections discussed with Ohio EPA and Dr. Stark during the August 20th teleconference, so the location of the two inclinometer lines can be confirmed, and needs to include a work schedule which establishes a date at which the installation of each inclinometer will begin and be completed. In addition, any circumstances that may delay installation, such as adverse weather, equipment malfunctions, etc., must be contemplated in the Work Plan, specifically the type of event, estimated work time lost, and an alternative timeframe for installation. Actual work to begin installation of the inclinometers on the West Slope needs to begin no later than August 27, 2007, unless weather conditions prohibit safe drilling.

Ohio EPA believes the West Slope lower elevation inclinometers can be installed through the use of the hollow stem auger drilling technique and, because of the anticipated subsurface temperatures, the lower elevation inclinometers can be constructed of "off the shelf" temperature resistant inclinometer casing. However, because of the proximity of the upper elevation inclinometers to the fire/reaction area, Ohio EPA recommends that these inclinometers be constructed of material that will withstand the unusually high subsurface temperatures, pressures, and other unique conditions found within the fire/reaction area. Countywide needs to consider installing thermistors on the inclinometers and pressure probes as done previously in the South Slope area to facilitate monitoring of the unique subsurface conditions in the 88 acres. Initially, Ohio EPA requests that all inclinometers be installed to a total depth of not less than 15' above the top of the liner.

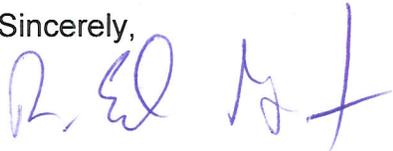
Based upon our discussions of August 16 and 17, 2007, Ohio EPA concurs with Countywide that the proposed surface monitoring program on the West Slope will provide useful slope movement data for that area. Countywide's surface monitoring program will include surface crack monitoring capable of measuring displacement between two tell tales on a Monday, Wednesday, and Friday frequency of the cracks along the South and West Slopes, especially in the vicinity of the flare station. In addition, Countywide has installed 66 surface pins that will be measured via a Global Positioning System device on the West Slope. These measurements will also be obtained on a Monday, Wednesday, and Friday frequency. Ohio EPA further recommends that Countywide measure pin movement on one slope line (top to bottom) using a total station survey method to assess accuracy of the GPS measurements. Ohio EPA recommends that the total station slope line be established between the proposed lines of inclinometers. The frequency for the total station measurement may be no less than once per week.

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Additionally, Ohio EPA requests that Countywide begin evaluating the need to install an engineered soil buttress at the toe of the West Slope, as was required to stabilize the substantial movement at the toe of the south slope (more than 6.8 feet horizontal movement and 2.4 feet vertical movement) or any other action to respond to stability related issues, such as leachate outbreak control. Based upon review of data, field observations, and the lack of a clear understanding of the total magnitude and mechanism of the South Slope movement, Ohio EPA is concerned that any slope movement in the West area of the landfill could pose a potential risk to the public and nearby infrastructure, which includes heavily traveled Interstate Highway 77. Ohio EPA and Countywide will need to utilize the inclinometer data to monitor and determine the type, rate, and magnitude of movement; however, Ohio EPA believes it is imperative that Countywide be prepared to take prompt action to redress these conditions in the event the inclinometer data demonstrates slope failure is imminent, or other factors indicate that prompt action is appropriate.

Ohio EPA makes the above requests in the attempt to better characterize and understand what is happening at Countywide based upon data, and in the spirit of fulfilling our obligation to protect public health, safety, and the environment. Your careful consideration of the issues raised herein is greatly appreciated. If you have any questions, please contact me at 614-644-2621. If I am unavailable and you need to speak with me about an urgent matter, please ask the receptionist to page me or transfer your call to Pam Allen.

Sincerely,



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

EG/sw

cc: DSIWM Civil Enforcement Files, CO  
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