



State of Ohio Environmental Protection Agency

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OHIO EPA Johnson, Lieutenant Governor
DIV. OF SOLID & INFECTIOUS WASTE MGMT. Kancelik, Director

Bob Taft, Governor

December 29, 2006

RE: REPUBLIC WASTE SERVICES OF OHIO
COUNTYWIDE RECYCLING
& DISPOSAL FACILITY (RDF)
STARK COUNTY
DIRECTOR'S FINAL FINDINGS
& ORDERS, SEPT. 6, 2006

Mr. Tim Vandersall
Countywide RDF
3619 Gracemont Street S.W.
East Sparta, OH 44626

Dear Mr. Vandersall:

The Ohio Environmental Protection Agency ("Ohio EPA") issued Final Findings and Orders ("Orders") on September 6, 2006, to Countywide Recycling & Disposal Facility ("hereinafter Countywide or Respondent") pursuant to the authority vested in the Director of Ohio EPA under Ohio Revised Code ("ORC") § 3704.03 and 3734.13. This letter is intended to memorialize the steps taken to implement these Orders and to document, where applicable, in field actions that were agreeable to Ohio EPA towards controlling odors at the facility.

The Findings and Orders required a number of actions on the company's part, all of which were designed to reduce odors at the facility to acceptable levels. Order 1 set forth an overarching timeframe to take these actions. Compliance with Order 1 is dependent on implementing and maintaining actions required in the Orders. While Countywide has implemented the required actions within the December 15th deadline, continued compliance will be contingent upon the proper operation and maintenance of the items listed in the Orders below. Note as well that ultimately, Respondent is obligated to comply with the air pollution nuisance prohibition in Ohio Administrative Code (OAC) Rule 3745-15-07.

Order 2 required the Odor Sampling and Analysis Workplan with an implementation schedule. The Respondent submitted Odor Sampling and Analysis Workplan, dated 9/27/06. This document detailed the odor sampling and analysis workplan that described the work required to comply with Order 2. The 14-Day Progress Report 4, dated 10/18/06, and Interim Status Report: Air Monitoring, dated 11/14/06, detailed the progress of odor-related air sampling at Countywide RDF and the surrounding areas and explained the progress of liquid leachate sampling. This report summarized the actions taken as of 11/14/06 to comply with Order 2, as well as the actions that still were pending as of that date.

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Order 3 required Respondent to install, implement, operate and maintain a number of control measures designed to capture or control landfill gas emissions. As staff from Ohio EPA and Countywide worked to implement some of these provisions, Ohio EPA and Countywide agreed to certain alternative steps that were deemed more technically prudent from perspectives of both environmental benefit and safety. These are summarized below:

- Order 3b: It was agreed that Countywide would not be required to conduct the survey required by this Order under the areas where the temporary flexible geomembrane cap has been installed.
- Order 3f: It was agreed that Countywide would not be required to install a new flare arrestor until it has completed an evaluation to determine if a new, more efficient arrestor is available that will improve the performance and decrease the downtime of the flare. Countywide shall submit the results of the evaluation for Ohio EPA to review and shall expeditiously install the arrestor if it is determined that it will improve the performance or decrease the downtime of the flare. Countywide shall monitor the current arrestor and shall frequently clean it to assure proper flare performance. Ohio EPA recommends that Countywide perform similar preventative maintenance on all of the landfill's flares.
- Order 3j: It was agreed that the landfill gas collection system plans required to be submitted by December 15, 2006, would be "as-built" as of November 15, 2006. Countywide is required to comply with all other requirements specified by this Order.
- Order 3k: It was agreed that the installation of the flare # 1 backup blower as required by this order would be installed as needed to minimize the flare's downtime. It is also recommended that Countywide purchase additional blowers and other equipment for all the landfill's flares to minimize *downtime and improve operation*.
- Order 3e: To fully comply with this Order, Countywide needs to provide Canton and Ohio EPA written completion reports of the outstanding corrective measures identified in Countywide's progress report dated October 18, 2006. These report(s) are due within 15 days of the completion of the corrective measure and are for the items not identified as being completed in the October 18, 2006, progress report.

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Order 7 required the installation of eight new gas pressure-monitoring probes in the south slope. As of 9/22/06, nine of the planned ten pressure monitoring probes were installed on the south slope. The tenth probe was not installed due to the construction of the buttress.

In accordance with Order 11, on October 18, 2006, Countywide submitted a request to change the language contained in Order 7. The request asserted that Countywide's strict adherence with Order 7 could possibly be detrimental to the overall goal of odor management and the stability of the landfill. The request contained alternative measures Countywide believed would sufficiently address the intent of the Order 7 including the construction of: (1) a toe buttress in the south slope toe area, (2) additional gas collection and control systems, (3) a temporary flexible membrane liner (FML) cap in the affected area, and (4) a gas collection and control system to remove and control the landfill gas collected under the cap. After reviewing this information, Ohio EPA agreed that the benefits contemplated under Order 7 were better accomplished with Countywide's technical approach set forth above.

On December 15, 2006, P.J. Carey & Associates submitted a letter that contained a summary of the additional measures discussed to improve and maintain stability in the affected area of the landfill. This letter stated that Countywide had: (1) completed construction of the stabilizing buttress and that the stability of the south slope is sufficient to allow capping of the affected area with FML, (2) completed most of the installation of the FML cap in the affected area and that the gas collection is currently being performed under the cap, (3) installed nine pressure probes (eight of which were required by Order 7) to monitor gas pressure and liquid heads in the south slope and monitoring was being conducted once per week; (4) installed six dewatering wells; and (7) installed vertical and horizontal gas collectors as shown on the "as built" drawing submitted to Ohio EPA. The letter additionally stated that Countywide planned to install additional dewatering and gas collection wells in the beginning of 2007, and they would submit a report addressing the stability of the affected area in or around January 20, 2007.

Ohio EPA expects that these measures be maintained and any alterations be approved by Ohio EPA. Records of the weekly monitoring of the gas pressures and liquid head pressures shall be maintained and made available upon request. Countywide shall also submit monthly reports to Ohio EPA containing the previous month's factors of safety for the affected area. The submittals shall start with the January 2007 report mentioned in P.J. Carey & Associates' December 15, 2006, letter and shall be submitted by the 20th of following month thereafter. Additionally, Ohio EPA reserves the right to add to or to make changes to these requirements.

Additionally, Ohio EPA requests that Countywide submit, for the Director's approval, a preventive maintenance and malfunction abatement plan (plan) for all landfill flares and other control measures and to expeditiously implement the plan. The plan shall be

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designed to prevent, detect and correct any malfunctions or equipment failures prior to their occurrence. It shall include, but is not limited to, a comprehensive preventive maintenance program that addresses the items and or conditions that will be inspected, the frequency of the inspections and/or repairs and the quantity and type of replacement parts that will be maintained in inventory for quick replacement. The plan will also contain a list of the monitoring parameters that will be used to detect and aid in the prevention of a malfunction or equipment failure, the normal range of these parameters, the monitoring frequency, and the recording and retaining of the monitoring and repairs records, as well as the procedure to be followed to aid in the prevention and correction of a malfunction or equipment failure.

Finally, the plan will describe the corrective procedures that will be taken in the event of a malfunction or equipment failure that will be used to expeditiously as practicable correct the event. Malfunction as used herein shall not necessarily have the same meaning as a malfunction defined in OAC 3745-15-06.

If you have any municipal solid waste questions concerning this document, please contact Joshua Adams, Ohio EPA, Northeast District Office at (330) 963-1103. If you have any air pollution control questions concerning this document, please contact Dan Aleman, Canton City Health Department at (330) 489-3327.

Sincerely,



William T. Skowronski
District Chief

WTS/ams

cc: Bob Hodanbosi, Ohio EPA, Central Office, DAPC
Tom Kahlman, Ohio EPA, Central Office, DAPC
Dan Harris, Ohio EPA, Central Office, DSIWM
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Kirk Norris, Stark County Health Department
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