

November 21, 2007

Ohio Environmental Protection Agency, Central Office
Division of Solid and Infectious Waste Management
Attn: Mr. Ed Gortner
P.O. Box 1049
Columbus, Ohio 43216-1049

RE: SUBMITTAL OF PROPOSED GAS PROBE LOCATIONS
ORDER 8 OF THE DIRECTOR'S FINAL FINDINGS AND
ORDERS OF NOVEMBER 7, 2007
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

Countywide Recycling and Disposal Facility (Countywide) hereby submits the attached layout of proposed alternate locations of gas monitoring probes to be installed to comply with Order 8 of the Findings and Orders dated November 7, 2007.

We anticipate that the drilling will commence as early as November 28, 2007, and as a result, we request your immediate attention and review. If you have questions, please do not hesitate to contact me at (330) 874-3855.

Sincerely,

(Jim Walsh of SCS Engineers on behalf of Tim Vandersall)

Tim Vandersall, P.E.
General Manager

cc: Pam Allen, OEPA-DSIWM
Kurt Princic, OEPA-NEDO
Karen Naples, OEPA-NEDO
Jeff Rizzo, OEPA-NEDO
Kirk Norris, SCHD
Dan Aleman, CHD
Mike Beaudoin, EarthTech
Todd Hamilton, CWRDF
Jason Perdion, B&H

SOIL GAS SURVEY MONITORING PROBE INSTALLATION COUNTYWIDE RDF, NOVEMBER 2007

The Director's Final Findings and Orders (DFF&Os) dated November 7, 2007 contained the following Order instructing Countywide to perform certain investigations to characterize the presence or absence of landfill gas along a portion of the southern side of the landfill.

Order 8.

Not later than 30 days after the effective date of the Orders, Respondent shall install soil gas survey monitoring probes, beginning at the haul road at the toe of the South Slope at approximately E: 43,500, and place one every 100 feet to E: 42,500, for a total of 11 probes. The probes shall be placed along the South Slope, and parallel to the soil buttress on the South Slope not more than 10 feet outside the limits of waste placement and the geosynthetic liner anchor trench, North of the gravel ditch, unless otherwise authorized in writing by Ohio EPA's DSIWM Enforcement Coordinator. The soil gas survey monitoring probes shall extend 30 feet vertically, and shall be screened no more than two feet below the surface and throughout the extent of the probe. Ohio EPA concurs with the use of direct push technology to determine the optimum placement of permanent monitoring points.

Order 8 gives Countywide the opportunity to propose alternate gas probe locations for review and approval by the DSIWM Enforcement Coordinator. Countywide is hereby submitting the proposed alternate locations described below. The alternate locations are being proposed for a number of reasons. Over most of the area described in Order 8, the permitted limits of waste placement and the geosynthetic liner anchor trench are covered by the soil buttress and the temporary membrane cap. Countywide does not want to penetrate the temporary membrane cap, to avoid compromising the membrane and avoid potential gas releases or odor problems. It is also likely that landfill gas will be present beneath the membrane and this gas could be unrelated to the gas that has been intermittently detected in probe M. There are also logistical difficulties with the drilling that can be avoided by not working on the soil buttress slope.

Proposed Soil Gas Survey Monitoring Probe Locations

The preliminary proposed gas probe locations shown on the attached drawing have been selected to attempt to adhere to the Order as closely as feasible given the general limitations (the temporary membrane cap and soil buttress) and the specific limitations for each location as discussed below.

The whole array and/or individual locations can be shifted as needed.

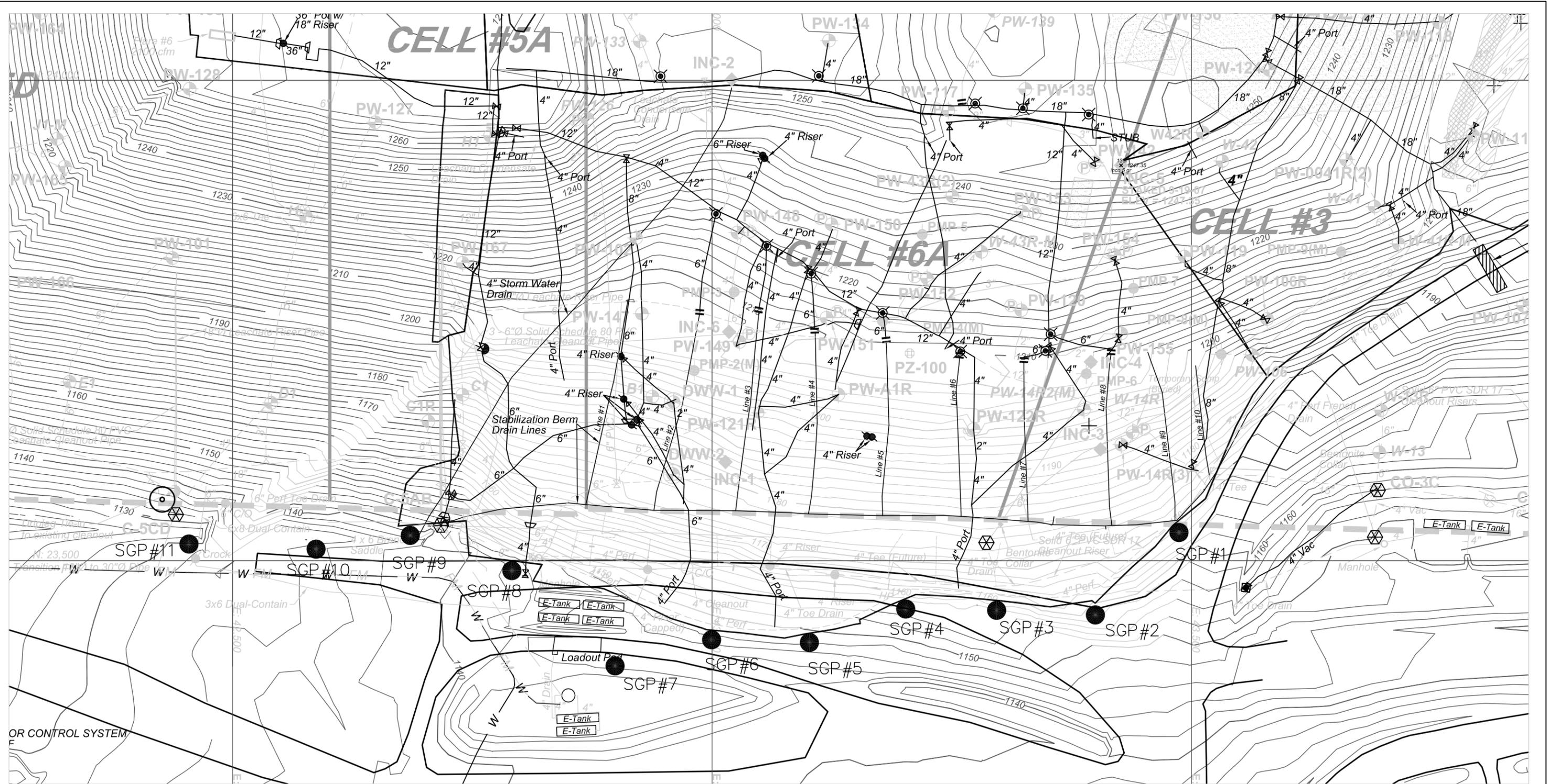
1. Located 10 feet south of the permitted limits of waste. May be too close to haul road to survive, and may need to be moved somewhat in the field to stay out of haul road traffic.
2. Located 10 feet off the temporary membrane cap.
3. Located 10 feet off the temporary membrane cap.
4. Located 10 feet off the temporary membrane cap.

5. Located 10 feet off the temporary membrane cap.
6. Located 10 feet off the temporary membrane cap.
7. This probe has been located to the south of the access road to the leachate loadout pad. There would be insufficient room between the temporary membrane cap and the leachate tank pad/berm to locate the probe north of the tanks.
8. Located 10 feet off the temporary membrane cap.
9. Located south of the surface water channel. The leachate lines are also located too close to the permitted limits of waste.
10. Located south of the surface water channel. The leachate lines are also located too close to the permitted limits of waste.
11. Located south of the surface water channel.

These are temporary probes and as such will not receive protective casings. A marker stake will be installed adjacent to the probe for visual identification and avoidance. The final proposed locations should be located by survey and staked before drilling to avoid underground utilities and the temporary membrane cap. The locations and reference elevations will be surveyed following installation.

The probes will be installed using direct push technology. Casing of sufficient diameter to permit the installation of 1-inch diameter screen and casing will be used. The casing will be advanced with a sacrificial point. Once the target depth is reached, the casing will be withdrawn sequentially as the probe is installed. The screened interval will be backfilled with coarse sand. The annulus above the sand pack will be sealed with bentonite. The riser will be fitted with a slip cap. A quick connect will be installed in the quick cap to facilitate subsequent gas monitoring.

The drilling subcontractor (Jersey West Drilling, Inc.) is tentatively scheduled to mobilize and begin drilling on Wednesday, November 28, 2007. It is imperative that the proposed gas probe locations be reviewed as soon as possible in order to make any necessary adjustments in the proposed field investigation program, and complete the probe installation by the deadline incorporated in the order.



SOURCE: "GAS SYSTEM CONSTRUCTION DRAWING" BY DEI, 10/26/07

LEGEND:

SGP #11 ● (SIZE)	PROPOSED SOIL GAS PROBE LOCATIONS	⊗	CLEANOUT MONITORING LOCATIONS
— (SIZE)	LFG HEADER/LATERAL (ABOVE GROUND)	⊕ W-4	ABANDONED VERTICAL EXTRACTION WELL
— (SIZE)	LEACHATE PIPE (ABOVE GROUND)	⊗ N1	ABANDONED REMOTE WELLHEAD
⊕ W-4	VERTICAL EXTRACTION WELL	---	EXISTING SOLID WASTE BOUNDARY

SCS ENGINEERS
 CONSULTING ENGINEERS, INC.
 2060 READING ROAD SUITE 200 CINCINNATI, OHIO 45202
 PH. (513) 421-5353 FAX NO. (513) 421-2847

PROJ. NO. 05206012	CADD FILE:	DATE: NOV 21, 2007	SCALE: 1"=100'
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ATTACHMENT
 PROPOSED SOIL GAS MONITORING
 PROBE LOCATIONS
 COUNTYWIDE RDF
 3619 GRACEMONT ST. S.W.
 EAST SPARTA, OHIO 44626