



Countywide Recycling & Disposal Facility

Division of Republic Waste Services of Ohio
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August 23, 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: RESPONSE TO COMMENTS ON TREATABILITY STUDY
DIRECTOR'S FINAL FINDINGS AND ORDERS OF MARCH 28, 2007
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

On July 9, 2007, Countywide Recycling and Disposal Facility (Countywide) submitted a Treatability Study Report as a supplement to the Fire Suppression Plan. On August 9, 2007, you hand-delivered your review comments to us. Many of your comments were technical in nature and we have attached technical responses and additional information from our consultant. The attachments include a presentation of specific responses to each individual comment, and two attachments to the specific responses. The two attachments present some of the references you requested in your comments and additional information on the laboratory methods and procedures utilized for the treatability study.

In general, we intended for the study to be aimed at determining if there were any agents that might stop the aluminum hydrolysis reaction, and we think that we achieved that goal. We agree that there are other reactions occurring and that these are not well understood. While we can hopefully agree to disagree as to the nature of the exothermic event(s) and the terminology used to describe it, we believe that the important thing is developing a way to stop or contain it. We believe that our treatability study provided a good, and important, first step toward evaluating if certain agents could have some effect.

Your staff and experts have opinions and understanding that, combined with our opinions and understanding, could be used to develop different treatability study approaches. We would encourage the opportunity to collaborate with you to develop additional study that could be done in Shaw's lab. Additional study, using expertise on both sides versus continued written correspondence between our two parties, might expedite our mutual understanding of the reaction and potential means to deal with it.

Please consider this as an invitation to meet to arrange a meeting to advance this issue. If you have any questions, please do not hesitate to contact me at (330) 874-3855.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Vandersall', with a long horizontal line extending to the right.

Tim Vandersall, P.E.
General Manager

cc/ec: Bill Skowronski, OEPA-NEDO
Kirk Norris, SCHD
Dan Aleman, CHD
ec: Gina Gerbasi, OEPA-CO
Jeff Martin, OEPA-CO
Todd Hamilton, CWRDF
Jason Perdion, B&H
Jim Walsh, SCS
Charles Schaefer, Shaw
Peter Carey, PJC Associates
Tom Bianca, Earth Tech
Michael Beaudoin, Earth Tech
Don Pierce, Consultant