



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

OHIO E.P.A.

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ENTERED DIRECTOR'S JOURNAL

CERTIFIED

August 5, 2013

Tim Vandersall
Countywide Recycling and Disposal Facility
3619 Gracemont Avenue S.W.
East Sparta, OH 44626

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: Janet Lessor Date: 8-5-13

**RE: COUNTYWIDE RECYCLING AND DISPOSAL FACILITY (RDF)
STARK COUNTY
OHIO ADMINISTRATIVE CODE (OAC) RULE 3745-27-10(D)(4) APPROVAL
ALTERNATIVE PARAMETER LIST FOR LOW-YIELD WELLS**

Dear Mr. Vandersall:

On April 4, 2013, the Ohio Environmental Protection Agency (Ohio EPA), Northeast District Office (NEDO) received the document titled *Request for Director's Approval per OAC Rule 3745-27-10(D)(4) Alternative Parameter List for Low Yield Wells* dated March 27, 2013. The document was submitted by Eagon & Associates, Inc. on behalf of Republic Services of Ohio II, LLC (Republic) and contains information and data to satisfy the requirements of OAC Rule 3745-27-10(D)(4) to support a request for an alternate parameter list for low yield wells not screened in the uppermost aquifer system (UAS).

Republic submitted the alternate parameter list for ground water monitoring wells MW-111 and MW-115 which are both screened within and monitor the #5 mine spoil, one of two significant zones of saturation (SZS).

OAC Rule 3745-27-10(D)(4) states, in part:

"Alternative parameters for low-yield wells not screened in the uppermost aquifer system - the owner or operator may propose in writing, that an alternative list of any of the Appendix I monitoring parameters be used to meet the requirements of paragraph (D)(5)(c) of this rule for those monitoring wells not screened in the uppermost aquifer system that cannot produce enough water within a twenty-four hour period to allow for the analysis of all of the required parameters...."

The submittal indicates that MW-111 and MW-115 are either dry or low yielding such that a limited volume of water cannot be recovered from the monitoring wells on a consistent basis to complete an OAC Rule 3745-27-10 Appendix I analysis. Therefore, Republic requests a parameter reprioritization, rather than a parameter reduction, based in part on:

1. The volatilization sensitivity prioritization of the parameters provided in the Ohio EPA Technical Guidance Manual for Hydrogeologic Investigations Chapter 10 (Feb 2006) and Ground Water Monitoring and U.S. EPA RCRA Ground Water Technical Enforcement Guidance Document (1986). The sampling order provided in the Ohio and U.S. EPA guidance was developed assuming sufficient well yield and sampling volume;
2. Well yield;
3. Required sample volume; and,
4. Parameters most indicative of a potential release of leachate to ground water.

The proposed alternate parameter list prioritization order 1 through 6 which will be collected as the monitoring wells recover up to 24 hours after purging is:

1. Volatile Organic Compounds;
2. Nutrients (Ammonia, Nitrate and Nitrite);
3. Metals;
4. Nutrients (Sulfate, Chloride and Alkalinity);
5. TDS; and,
6. Field Parameters (Turbidity, Temperature, Specific Conductance, and pH).

Ohio EPA, Division of Drinking and Ground Waters (DDAGW) NEDO have reviewed the applicable information and concludes that Republic has provided sufficient information and data to meet the requirements of OAC Rule 3745-27-10(D)(4). Republic has demonstrated that ground water monitoring wells MW-111 and MW-115 are either dry or low yielding such that a limited volume of water cannot be recovered from the monitoring wells on a consistent basis to complete an OAC Rule 3745-27-10 Appendix I analysis. As such, I hereby authorize Republic to use the proposed alternate parameter list prioritization order 1 through 6 as specified above for MW-111 and MW-115.

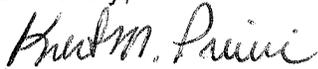
Tim Vandersall
Countywide Recycling and Disposal Facility
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You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Joshua Adams of Ohio EPA, DMWM-NEDO at (330) 963-1103.

Sincerely,



Kurt M. Princic,
Chief, Northeast District Office
for Scott J. Nally
Director, Ohio EPA

KMP/SJN/JA/cl

cc: Scott Hester, DMWM-CO
Jeffrey Rizzo, DDAGW-NEDO
Lynn Sowers, DMWM-NEDO
Jeff Hurdley, Legal
Nicholas Bryan, Attorney General's Office
Paul DePasquale, Stark County Health Department