



State of Ohio Environmental Protection Agency

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MAR 15 2002

ENTERED DIRECTOR'S JOURNAL

MAR 15 2002

OHIO E.P.A.

Mr. Mike Porath
Suburban South Recycling and Disposal Facility
3415 Township Road 447
Glenford, Ohio 43739

RE: **Suburban South RDF, Perry County
.Alternative Daily Cover Approval**

Dear Mr. Porath:

On December 7, 2001, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Southeast District Office (SEDO), received your request for authorization to use an alternative daily cover material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3) at Suburban South Recycling and Disposal Facility (RDF) in Perry County.

OAC Rule 3745-27-19(F)(3) states, "The director may approve alternative materials and/or thicknesses for daily cover if the owner or operator can demonstrate to the satisfaction of the director that the alternative material and/or thickness provides comparable protection and is protective of human health and the environment."

In your written correspondence dated December 6, 2001, you requested permission to use Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material as alternative daily cover material at Suburban South RDF. Although this material has not been approved for use as alternative daily cover material in Ohio, Ohio EPA recognizes that Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material has the potential to provide protection comparable to six inches of soil as required by OAC Rule 3745-27-19(F). Therefore, pursuant to OAC 3745-27-19(F)(3), I hereby authorize Suburban South RDF to use Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material as an alternative to six inches of soil for daily cover at the facility for a trial period to end one hundred eighty (180) days from the date of this authorization.

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

Zona Clement 3-15-02

Date

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

This approval is granted with the following conditions:

1. This authorization is limited to the use of only Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material at Suburban South RDF. No other alternative daily cover material may be used at Suburban South RDF without prior authorization from the Ohio EPA.
2. Suburban South RDF shall place Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material over exposed waste materials by the end of the working day, or more frequently if necessary, to control fire hazards, blowing litter, odors, dust, insects and rodents.
3. If inclement weather conditions render the placement or use of Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material ineffective or otherwise unsatisfactory, Suburban South RDF shall temporarily revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F) until such conditions cease to exist. Under such circumstances the owner/operator may apply another alternative daily cover material that has been approved for use at Suburban South RDF, provided that the alternative daily cover material is able to perform effectively under inclement conditions.
4. If Suburban South RDF determines that Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material is ineffective, or otherwise unsatisfactory under normal operating conditions, Suburban South RDF shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F). Suburban South RDF shall verbally notify Ohio EPA, SEDO and Perry County Health Department of this action by the end of the next working day and shall submit written notification to Ohio EPA, SEDO within fourteen (14) calendar days. This notification is not necessary if the use of Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material ceases on a temporary basis in accordance with Condition No. 3. Under such circumstances, the owner/operator may apply another alternative daily cover material that has been approved for use by Ohio EPA at the facility.
5. If the Ohio EPA or Perry County Health Department determines that the use of Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material is ineffective or unsatisfactory under normal operating conditions, then permission to use Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material may be revoked upon written notification from the Director of Environmental Protection. Immediately upon such revocation, Suburban South RDF shall cease to use Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material at the facility and shall revert to using conventional soil

RDF shall cease to use Geotextiles INS W300 woven geotexture with 10 minimum 570 reinforcement material at the facility and shall revert to using conventional soil

cover in accordance with OAC Rule 3745-27-19(F). Under such circumstances, the owner/operator may apply another alternative daily cover material that has been approved for use at the facility.

6. Suburban South RDF shall not have more than 43,560 square feet of waste covered with alternative daily cover material at any one time. This maximum area applies to the use of Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material by itself or in combination with other alternative daily cover materials that the director has authorized to be used at Suburban South RDF.
7. Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material shall not be used as intermediate or final cover. Any solid waste disposal area that remains inactive for a period of seven (7) days, and has been covered with Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material, shall be covered with at least six inches of soil in accordance with OAC Rule 3745-27-19(F) by the end of the seventh day.
8. Not later than one hundred twenty (120) days after the effective date of this authorization, Suburban South RDF shall submit to Ohio EPA, SEDO a report comparing the effectiveness of Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material to conventional soil cover and other alternative daily cover materials that have been used at the facility. If, as provided in Condition No. 4 or 5, Suburban South RDF ceases to use Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material prior to the end of the one hundred eighty (180) day trial period, then the report shall be due not later than thirty (30) days after use ceases. In either situation, the report shall contain a discussion of the following items:
 - Number of days the material was used;
 - Weather conditions at the time placement of the material was inspected;
 - Number of days odors were detected;
 - Presence of vectors, rodents, and insects;
 - Any increase in blowing litter; and
 - Method(s) for controlling fire during use of alternative daily cover material.
9. Photographs from at least two opposing sides of the working face shall be taken of the working face after Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material has been applied. At least four (4) such series of photographs shall be taken within the one hundred eighty (180) day trial period. These photographs shall be included in the report required by Condition No.8.

10. This authorization to use Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material will expire one hundred eighty (180) days after the effective date of this authorization. Suburban South RDF may not use Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material as daily cover after that date unless authorization for continued use has been provided by Ohio EPA.
11. Nothing in this letter shall be construed to authorize any waiver from the requirements of any other applicable federal or state laws or regulations. This letter shall not be interpreted to release Suburban South RDF from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code; under the Federal Clean Water Act, Resource Conservation And Recovery Act, or Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants to the environment.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Commission within thirty (30) days after notice of the director's action. A copy of the appeal must be served on the director within three (3) days of filing with the Commission. An appeal may be filed with the Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

In the event that Suburban South RDF finds Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material to be acceptable and wishes to obtain approval for continued use, authorization for on-going use of this material after the one-hundred eighty (180) day trial period is required. In order to avoid temporary discontinuance of the use of Geotextiles TNS W300 woven geotextile with TC Mirafi HP 570 reinforcement material, Ohio EPA recommends that a request for continued authorization be submitted at least forty-five (45) days prior to the end of the trial period.

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If you have any questions or need technical assistance with this authorization, please contact Dale Warner at (740) 380-5435.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Jones". The signature is fluid and cursive, with the first name "Christopher" written in a larger, more prominent script than the last name "Jones".

Christopher Jones, Director

cc: Steve Rine, Supervisor, DSIWM, SEDC ✓
Scott Hester, Supervisor, DSIWM, CO ✓
Dave Foucart, Perry County Health Department