



State of Ohio Environmental Protection Agency

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Mr. William Hadley
Landfill Manager
Mt. Eaton Reclamation, Inc.
P.O. Box 256
Mt. Eaton, Ohio 44659

**Re: Mt. Eaton Landfill, Wayne County
Alternative Daily Cover Approval**

Dear Mr. Hadley:

On April 29, 2003, the Division of Solid and Infectious Waste Management (DSIWM) at the Ohio Environmental Protection Agency (Ohio EPA) Northeast District Office (NEDO) received a written request for authorization to use alternative daily cover material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3) at the Mt. Eaton Landfill (Facility) in Wayne 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 the April 29, 2003, letter, you requested permission to use any woven polypropylene geotextile that meets certain material specifications as alternative daily cover material at the Facility. The material specifications are as follows:

PROPERTY	TEST METHOD	VALUE
Tensile Strength, lbs	ASTM D-4632	200
Elongation @ Break %	ASTM D-4632	15
Mullen Burst, psi	ASTM D-3786	450
Puncture, lbs	ASTM D-4833	100
Trapezoidal Tear, lbs	ASTM D-4533	75
AOS, US Std Sieve	ASTM D-4751	40

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Christopher Jones, Director

Permittivity, sec-1	ASTM D-4491	.07
UV Resistance, % retained (500 hrs)	ASTM D-4355	90

Ohio EPA recognizes that any woven polypropylene geotextile which meets the above material specifications 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 Rule 3745-27-19(F)(3), I hereby authorize the owner/operator to use woven polypropylene geotextile as alternative daily cover material at the Facility in accordance with the following conditions:

1. This authorization is limited to the use of only a woven polypropylene geotextile that meets the above specifications at Mt. Eaton Landfill. No other alternative daily cover materials may be used at the Facility without prior authorization from Ohio EPA.
2. The owner or operator shall place the woven polypropylene geotextile over exposed waste materials by the end of the working day, or more frequently if necessary, to control fire hazards, blowing litter, odor, dust, insects, and rodents.
3. If inclement weather conditions will render the placement or use of the woven polypropylene geotextile ineffective or otherwise unsatisfactory, the owner/operator 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 the Facility, provided that the alternative daily cover material is able to perform effectively under the inclement conditions.
4. If the owner/operator determines that the woven polypropylene geotextile is ineffective or otherwise unsatisfactory under normal operating conditions, the owner/operator shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F) or another alternative daily cover material that has been approved at the Facility. The owner/operator shall verbally notify Ohio EPA, NEDO and Wayne County Health Department of this action by the end of the next working day and shall submit written notification to Ohio EPA, NEDO within 14 calendar days. This notification is not necessary if the use of the woven polypropylene geotextile ceases on a temporary basis in accordance with Condition No. 3.
5. If Ohio EPA or Wayne County Health Department determines that the use of the woven polypropylene geotextile is ineffective or unsatisfactory under normal operating conditions, then permission to use the material may be revoked by the Director of Environmental Protection. Immediately upon such revocation, the owner/operator shall cease using the woven polypropylene geotextile 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. The owner/operator shall not have more than 20,000 square feet of waste covered with alternative daily cover material. This maximum area applies to the use of the woven polypropylene geotextile by itself or in combination with other alternative daily cover materials that the director has authorized to be used at the Facility.
7. The owner/operator shall promptly repair or replace the woven polypropylene geotextile if it becomes frayed, torn, ripped, or otherwise rendered unuseable and is therefore no longer able to serve its intended purpose.
8. The woven polypropylene geotextile shall not be used as intermediate or final cover. Any solid waste disposal area that remains inactive for a period of seven days and is covered with woven polypropylene geotextile 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.
9. Any scrap tires used by the owner/operator to secure the alternative daily cover material shall be managed in accordance with Chapter 3734 of the Ohio Revised Code and the rules promulgated thereunder.
10. Not later than one hundred and twenty days after the effective date of this authorization, the owner/operator shall submit to Ohio EPA, NEDO a report comparing the effectiveness of the woven polypropylene geotextile to the use of conventional soil cover and other alternative daily cover materials used at the Facility. If, as provided in Conditions No. 4 & 5, the owner/operator ceases to use the woven polypropylene geotextile prior to the end of the 180-day trial period, then the report shall be due not later than 30 days after use ceases. In either situation, the report shall include a list of all woven polypropylene geotextiles used during the temporary approval period, and for each material listed, shall discuss the following items:
 - a. Number of days the material was used
 - b. Weather conditions at the time the material was evaluated for effectiveness
 - c. Number of days odors were detected
 - d. Presence of vectors, rodents, and insects
 - e. Any increase in blowing litter
 - f. Method(s) for controlling fire during use of the alternative daily cover material
11. Photographs of the working face shall be taken from at least two opposing sides after the woven polypropylene geotextile has been applied. At least four such series of photographs shall be taken during the trial period. These photographs shall be included in the report required by Condition No. 10.
12. The authorization to use the woven polypropylene geotextile will expire 180 days after the effective date of this authorization. The owner/operator may not use the woven polypropylene geotextile as daily cover material after that date unless authorization for continued use has been provided by Ohio EPA.
13. The use of the woven polypropylene geotextile as alternative daily cover material shall be

documented on the required Municipal Solid Waste Disposal Facility Daily Log of Operations, Form 3 on each day it is used as alternative daily cover material, including identification of the specific woven polypropylene geotextile(s) used that day.

14. 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 the owner/operator from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Revised Code; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, or the 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 of Environmental Protection is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Ohio Revised Code 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 30 days after notice of the director's action. Notice of the filing of the appeal shall be filed with the director within three days after the appeal is filed with the Commission. An appeal may be filed with the Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street
Room 222
Columbus, Ohio 43215

In the event that the owner/operator finds any of the woven polypropylene geotextiles to be acceptable and wishes to continue their use, authorization for on-going use after the 180-day trial period is required. In order to avoid temporary discontinuance of the use of the woven polypropylene geotextiles, Ohio EPA recommends that the owner/operator submit a request for this authorization at least 45 days prior to the end of the trial period.

If you have any questions regarding this authorization, please contact Clarissa Gereby of Ohio EPA, NEDO at (330) 963-1224.

Sincerely,

Christopher Jones
Director

CJ/CG/cl

cc: Murat Tukel, DSIWM, NEDO
Scott Hester, DSIWM, CO
Ken Eng, Wayne County Health Department