



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

**MAILING ADDRESS:**

Lazarus Government Center  
122 S. Front Street  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

P.O. Box 1049  
Columbus, Ohio 43216-1049

Crawford County Board of Commissioners  
Crawford County Courthouse  
112 East Mansfield Street  
Bucyrus, Ohio 44820

**Re: Crawford County Landfill  
Alternative Daily Cover Approval**

Dear Commissioners:

On May 29, 2003, the Ohio Environmental Protection Agency (Ohio EPA) issued consensual Director's Final Findings and Orders to the Crawford County Commissioners to address several compliance issues at their landfill. Order 8 required the Commissioners to exhume waste, assess damage, repair or replace components if necessary, and re-certify the landfill's Phase 1 side slope liner system. Order 10 authorized the temporary use of alternative daily cover (ADC) material during the 14-day waste excavation period as specified in the assessment and repair plan.

On August 25, 2003, Ohio EPA received a letter from North Point Engineering, on behalf of the Commissioners, requesting changes in the assessment and repair plan to accommodate the contractor – New Dominion Construction, Inc. of McDonald, Pennsylvania – and their proposed project approach. Four of the six proposed changes were authorized by Ohio EPA's Northwest District Office in a letter dated September 9, 2003. The remaining proposed changes in the project include a request to use a spray-on foam ADC material (ConCover SW) manufactured by New Waste Concepts, Inc. of Erie, Michigan. The ConCover SW product is proposed to be used for excavated slopes below elevation 1050 MSL and for daily cover on waste that is temporarily stockpiled outside of the waste excavation area. The letter also contains a request to extend the timeframe for use of the ADC to a maximum of 45 days to accommodate waste excavation, certification, and the backfilling activities associated with the repair work in Phase 1 of the landfill.

Ohio EPA has reviewed the request, and I hereby approve the use of ConCover SW at the Crawford County Landfill for a maximum timeframe of 45 days during waste excavation, certification, and the backfilling activities. As part of this approval, the Commissioners are subject to the following conditions:

1. This approval is limited to the use of only ConCover SW for Phase 1 side slope liner repair work at the Crawford County Landfill. No other ADC material may be used at the landfill without prior authorization from Ohio EPA. This approval is limited to the exposed

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



Printed on Recycled Paper

Ohio EPA is an Equal Opportunity Employer

waste below elevation 1050 MSL. All exposed waste above 1050 MSL, including waste stockpiles, shall be covered with a minimum of 12 inches of intermediate soil cover.

2. The Commissioners shall place ConCover SW over exposed waste materials by the end of the working day or more frequently if necessary to control fire, fire hazards, blowing litter, odors, dust, insects, and rodents.
3. The Commissioners shall not have more than one phase of the repair work for the Phase 1 side slope covered with ADC material at any one time.
4. The Commissioners shall apply ConCover SW from three opposing sides of the exposed waste to form a complete, uninterrupted cover.
5. The Commissioners shall not apply ConCover SW during a rainfall event. In the event that precipitation renders ConCover SW ineffective, prior to or following normal curing, another application of ConCover SW or six inches of soil shall be applied as soon as possible.
6. The ConCover SW material shall be applied in accordance with the above conditions at least every seven days during the project.

Nothing in this approval shall be construed to authorize any waiver from the requirements of any other applicable federal or state laws or regulations. This approval shall not be interpreted to release the Commissioners from responsibility under Ohio Revised Code (ORC) Chapters 3704, 3714, 3734, or 6111; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other 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 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 30 days after the notice of the director's action. A copy of the appeal must be served on the director within three days of filing 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

If you have any questions concerning this approval, please contact Mary Ann Miller of Ohio EPA's Northwest District Office at (419) 373-3060.

Sincerely,

Christopher Jones  
Director

cc: Ms. Jackie Ward, Crawford County Health Department  
Mr. Ron Zitek, North Point Engineering  
Ms. Mary Ann Miller, Ohio EPA, DSIWM-NWDO  
Mr. Richard Strickland, Environmental Services  
DSIWM NWDO File