



State of Ohio Environmental Protection Agency

OHIO E.P.A.

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ENTERED DIRECTOR'S JOURNAL

JUN 21 2001

Dave Gallagher, Manager
Coshocton Landfill, Inc.
19469 County Road 7
Coshocton, Ohio 43812

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.

By: [Signature] Date: 6-21-01

**RE: Coshocton Landfill, Inc., Coshocton County
Alternative Daily Cover, Final Approval**

Dear Mr. Gallagher

On March 19, 2001, the Ohio Environmental Protection Agency (Ohio EPA) Southeast District Office (SEDO) received a report from Coshocton Landfill, Inc. (Coshocton Landfill) outlining the performance of spent, non-toxic foundry sand as an alternative daily cover (ADC) material during the 180-day trial period at the Coshocton Landfill. Within this report you requested final approval to utilize spent, non-toxic foundry sand as an ADC in lieu of daily soil cover for a period up to 30 days at a time on an ongoing basis.

The Coshocton Landfill is hereby granted approval to use spent, non-toxic foundry sand as ADC in lieu of daily soil cover for a period up to 30 consecutive days per application area on an ongoing basis subject to the following conditions:

CONDITIONS

1. This authorization is limited to the use of spent, non-toxic foundry sand only at the Coshocton Landfill. No other alternative daily cover material may be used at the Coshocton Landfill without prior authorization from Ohio EPA.
2. The Coshocton Landfill shall place spent, non-toxic foundry sand 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 spent, non-toxic foundry sand ineffective or otherwise unsatisfactory, the Coshocton Landfill shall temporarily revert to using conventional soil cover in accordance with Ohio Administrative Code (OAC) Rule 3745-27-1 9(F) until such conditions cease to exist. Under such circumstances, the Coshocton Landfill 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.

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

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4. If the Coshocton Landfill determines that spent, non-toxic foundry sand is ineffective or otherwise unsatisfactory under normal operating conditions, the Coshocton Landfill shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-1 9(F). Under such circumstances, the Coshocton Landfill may apply another alternative daily cover material that has been approved for use at the facility. The Coshocton Landfill shall verbally notify Ohio EPA, SEDO and Coshocton County Health Department of this action by the end of the next working day and shall submit written notification to Ohio EPA, SEDO not later than fourteen (14) calendar days after use has ceased. This notification is not necessary if the use of spent, non-toxic foundry sand ceases on a temporary basis in accordance with Condition No. 2.
5. If Ohio EPA or Coshocton County Health Department determines that the use of spent, non-toxic foundry sand is ineffective or unsatisfactory under normal operating conditions, then permission to use the material may be revoked upon written notification from the Director of Environmental Protection (director). Immediately upon such revocation, the Coshocton Landfill shall cease to use the material at the facility and shall revert to using conventional soil cover in accordance with OAC Rule 3745-27-1 9(F). Under such circumstances, the Coshocton Landfill may apply another alternative daily cover material that has been approved for use at the facility.
6. The Coshocton Landfill shall not have more than 43,560 square feet of the working face covered with alternative daily cover material. This amount represents the maximum area that can be covered with alternative daily cover material at any one time. This maximum area applies to the use of spent, non-toxic foundry sand by itself, or in combination with other alternative daily cover materials that the director has authorized to be used at the Coshocton Landfill.
7. Spent, non-toxic foundry sand 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 ADC, shall be covered with at least six (6) inches of soil in accordance with OAC Rule 3745-27-19(F) by the end of the seventh day.
8. Each source of foundry sand shall be analyzed in accordance with Ohio EPA Policy DSW 0400.007 at least annually. Any result which exceeds the criteria set forth in Ohio EPA Policy DSW 0400.007 shall be immediately reported to Ohio EPA, Division of Solid and Infectious Waste Management (DSIWM), SEDO. Whenever the production process or raw materials used in the production process generating the foundry sand change, an analysis shall be conducted and the results submitted to Ohio EPA DSIWM, SEDO.

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9. 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 Coshocton Landfill 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 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 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

If you have any questions regarding this authorization, please contact Dale Warner at (740) 380-5435.

Sincerely,



Christopher Jones
Director

cc: Steve Rine, Supervisor, DSIWM, SEDO
Scott Hester, Supervisor, DSIWM, CO ✓
Coshocton County Health Department

CJ/DW/jg