

OHIO E.P.A.
JUN 15 2001
ENTERED DIRECTOR'S JOURNAL

Date Issued: JUN 15 2001
Date Effective: JUN 15 2001

**BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY**

In the Matter Of:

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

Directors Final Findings
and Orders

Respondent

PREAMBLE

It is hereby agreed by and among the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are hereby issued to the Crawford County Commissioners (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Sections 3734.43 and 3745.01 of the Ohio Revised Code (ORC).

II. PARTIES

These Orders shall apply to and be binding upon Respondent, and its assigns and successors in interest. No change in ownership relating to the Facility will in any way alter Respondent's obligations under these Orders. Respondent's obligations under these Orders may be altered only by the written approval of the Director of Ohio EPA.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as used in ORC Chapter 3734. and the regulations promulgated thereunder.

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.

6/15/01

IV. FINDINGS OF FACT

The Director has determined the following findings of fact:

1. Respondent is the owner, operator, and licensee of the Crawford County Landfill (Facility) located at 5128 Lincoln Highway, Liberty and Whetstone Townships, Bucyrus, Ohio.
2. The Facility is a "sanitary landfill facility" as defined under Ohio Administrative Code (OAC) Rule 3745-27-01 (C)(4) and is authorized to accept "solid waste" as that term is defined under ORC Section 3734.01 (E) and OAC Rule 3745-27-01 (B)(43).
3. Respondent is currently operating the Facility pursuant to the Lateral Expansion Permit to Install (PTI) No. 03-5721, effective March 20, 1995. Condition 15 of PTI No. 03-5721 required Respondent to cease accepting waste and initiate closure of the existing unit of the Facility, known as the EIPTI Area, by March 20, 1996.
4. In correspondence dated December 7, 1995, Respondent requested an extension to the March 20, 1996 deadline outlined in Condition 15 of the Facility's approved PTI No. 03-5721. On March 6, 1996, the Director of Ohio EPA modified Condition 15 of the Facility's approved March 20, 1995 PTI No. 03-5721 to the following:

"Not later than June 20, 1996, the permittee shall cease accepting waste and initiate closure of the existing unit (EIPTI Area) of the Crawford County Landfill in accordance with the approved Final Closure/Post-Closure Plan."
5. Pursuant to OAC Rule 3745-27-1 1 (I), Respondent was required to complete closure of the EIPTI Area within 180 days after the final receipt of waste on June 20, 1996, or by December 17, 1996. Ohio EPA notified Respondent of the requirements of **OAC Rule 3745-27-1 1 (I)** in correspondence dated August 1, 1996, August 7, 1996, and November 6, 1996.
6. Respondent failed to complete closure activities of the EIPTI Area located north of the lateral expansion unit within 180 days after final receipt of waste. Ohio EPA notified Respondent of the violation of **OAC Rule 3745-27-1 I(I)**, which was initially discovered during a Facility inspection conducted by Ohio EPA on January 30 and 31, 1997, in correspondence dated February 14, 1997; February 19, 1997; April 11, 1997; June 1 1 1997; July 17, 1997; November 28, 1997; February 17, 1998; November 4, 1998; and May 4, 1999; This is also a violation of **OAC Rule 3745-27-19(H)**.
7. In correspondence dated March 24, 1997 and April 24, 1997, the Crawford County Health Department notified Respondent of violations of **OAC Rule 3745-27-1 I (I)**, which were initially discovered during a Facility inspection conducted by the

Crawford County Health Department on March 17, 1997. Respondent failed to complete closure activities of the EIPTI Area located north of the lateral expansion unit within 180 days after final receipt of waste.

8. On November 18, 1998, Ohio EPA received a report titled, "Report On Construction Quality Assurance Services For EIPTI Cover Crawford County Landfill Bucyrus, Ohio." This report served to certify final cover installation over a portion of the EIPTI Area. After reviewing this submittal, Ohio EPA sent Respondent a Notice of Deficiency (NOD) on March 24, 1999. To date, Respondent has not responded to the NOD.
9. In correspondence dated September 12, 1997; May 14, 1998; January 4, 1999; April 12, 1999; and May 9, 1999, Ohio EPA notified Respondent of the following violations of OAC **Rule 3745-27-10**:
 - a. Respondent violated **OAC Rule 3745-27-10(B)(3)(d)** by failing to: 1) revise the Ground Water Detection Monitoring Plan (GWDMP); and 2) document the addition of the significant zone of saturation in the southeast portion of the Facility.
 - b. Respondent violated **OAC Rule 3745-27-10(B)(3)(e)** by failing to maintain the monitoring wells in accordance with the design specifications. In particular, Respondent has failed to investigate and remedy turbidity problems with monitoring well P-8.
 - c. Respondent violated **OAC Rule 3745-27-10(B)(5)** by failing to include a potentiometric surface map for the significant zone of saturation in the southeast portion of the Facility with the 1997 and 1998 Annual Reports and by including an incorrectly contoured potentiometric surface map for the uppermost aquifer system with the 1998 Annual Report. Respondent has since addressed this violation.
 - d. Respondent violated **OAC Rule 3745-27-10(C)(1)** by failing to employ consistent sampling and analysis procedures that can provide an accurate representation of the ground water quality. Respondent has since addressed this violation.
 - e. Respondent violated **OAC Rule 3745-27-10(D)(5)(c)** by failing to analyze monitoring well Z-I for all 79 analytes listed in Appendix I. Respondent has since addressed this violation.
10. In correspondence dated October 5, 1995; November 3, 1995; February 2, 1996; April 23, 1996; May 28, 1996; August 1, 1996; August 7, 1996; February 19, 1997; February 27, 1997; April 11, 1997; June 11, 1997; September 2, 1997; September 12, 1997; November 28, 1997; January 5, 1998; February 17, 1998; April 14, 1998;

May 14, 1998; July 6, 1998; August 4, 1998; November 17, 1998; April 12, 1999; May 4, 1999; May 9, 1999 and March 28, 2000, Ohio EPA notified Respondent of the following violations of **OAC Rule 3745-27-19** which were discovered during inspections of the Facility conducted by Ohio EPA on September 25 1995; October 25, 1995; January 22, 1996; April 3, 1996; May 13, 1996; July 11, 1996; July 22, 1996; January 30, 1997; February 11, 1997; May 23, 1997; August 12, 1997; November 4, 1997; December 16, 1997; January 28, 1998; March 24, 1998; July 17, 1998; October 28, 1998; November 18, 1998; April 22, 1999; and March 2, 2000:

- a. Respondent violated **OAC Rule 3745-27-19(C)** by failing to submit monthly and daily waste receipt summaries to Ohio EPA by the 15th day of the month following the reporting period as required by the Facility's authorizing documents.
- b. Respondent violated **OAC Rule 3745-27-19(E)(4)** by failing to confine unloading of waste materials to the smallest practical area.
- c. Respondent violated **OAC Rule 3745-27-19(E)(5)** by failing to collect, contain and dispose of scattered litter.
- d. Respondent violated **OAC Rule 3745-27-19(E)(12)** by failing to complete all of the required entries in the Facility's daily log of operations.
- e. Respondent violated **OAC Rule 3745-27-19(E)(22)** by failing to deposit solid waste at the working face.
- f. Respondent violated **OAC Rule 3745-27-19(E)(26)** by failing to maintain the integrity of the engineered components of the sanitary landfill facility and repair any damaged components, including those components installed in accordance with OAC Rule 3745-27-10.
- g. Respondent violated **OAC Rule 3745-27-19(E)(30)** by accepting for disposal and disposing of whole scrap tires or shredded scrap tires.
- h. Respondent violated **OAC Rule 3745-27-19(F)** by failing to: 1) apply a minimum of 6 inches of daily cover to all exposed solid waste at the end of each working day; 2) cover placed solid waste within 24 hours of disposal; and 3) ensure that cover soil is non-putrescible, not composed of solid waste and does not contain large objects which will interfere with its intended purpose.
- i. Respondent violated **OAC Rule 3745-27-19(G)(I)** by failing to apply an intermediate cover of at least 12 inches in thickness to all filled areas of the Facility where additional solid waste is not to be deposited for at least 30 days.

- j. Respondent violated **OAC Rule 3745-27-19(J)(4)** by failing to undertake actions as necessary to correct conditions causing ponding or erosion.
 - k. Respondent violated **OAC Rule 3745-27-19(K)(4)** by failing to obtain authorization from the Director of Ohio EPA to store leachate within the limits of waste placement.
 - l. Respondent violated **OAC Rule 3745-27-49(M)** by failing to correctly contour the potentiometric surface map for the uppermost aquifer system in the 1998 Annual Operational Report.
 - m. Respondent violated **OAC Rule 3745-27-19(M)(7)** by failing to incorporate into the 1998. Annual Operational Report a summary of maintenance activities performed on the ground water monitoring system.
- 11.** In correspondence dated August 1, 1996, Ohio EPA notified Respondent that failure to submit the daily and monthly waste receipt summaries to Ohio EPA is a violation of **Condition #10** of the approved **March 20, 1995 PTI No. 03-5721**. Respondent's failure to comply with Condition 10 of the Facility's approved March 20, 1995 PTI is also a violation of **OAC Rule 3745-27-19(C)**.
12. In correspondence dated January 5, 1998, Ohio EPA notified Respondent of the violation of **OAC Rule 3745-27-19(C)** for failing to operate in accordance with the approved March 20, 1995 PTI No. 03-5721. This violation was cited because the Respondent constructed a ramp consisting of solid waste in an area not approved for waste placement. This violation was initially discovered during a Facility inspection conducted by Ohio EPA on December 16, 1997.
13. in correspondence dated February 26, 1996; March 19, 1997; April 24, 1997; November 12, 1998; and November 23, 1998, the Crawford County Health Department notified Respondent of the following violations of **OAC Rule 3745-27-19**, 'which' were discovered during inspections of the Facility conducted by the Crawford County Health Department on February 23, 1996; March 17, 1997; April 15, 1997; October 28, 1997; and November 18, 1998:
- a. Respondent violated **OAC Rule 3745-27-19(E)(4)** by failing to confine unloading of waste materials to the smallest practical area.
 - b. Respondent violated **OAC Rule 3745-27-19(E)(5)** by failing to collect, contain and dispose of scattered litter.
 - c. Respondent violated **OAC Rule 3745-27-19(E)(17)** by failing to comply with all applicable requirements for leachate treatment or disposal,

- d. Respondent violated **OAC Rule 3745-27-19(F)** by failing to: 1) apply a minimum of 6 inches of daily cover to all exposed solid waste at the end of each working day; 2) cover placed solid waste within 24 hours of disposal; and 3) ensure that cover soil is non-putrescible, not composed of solid waste and does not contain large objects to interfere with its intended purpose.
 - e. Respondent violated **OAC Rule 3745-27-19(J)(4)** by failing to undertake actions as necessary to correct conditions causing ponding or erosion.
14. In correspondence dated November 4, 1999, Ohio EPA notified Respondent of the following violations of **OAC Rule 3745-27-19** and **OAC Rule 3745-27-08** which were initially discovered during a Facility inspection conducted by Ohio EPA and the Crawford County Health Department on October 8, 1999:
- a. Respondent violated **OAC Rule 3745-27-19(G)(4)** by failing to establish a dense vegetative cover to prevent erosion.
 - b. Respondent violated **OAC Rule 3745-27-19(G)** by failing to apply 12 inches of intermediate cover over all areas which will not receive additional waste for a time period of greater than 30 days.
 - c. Respondent violated **OAC Rule 3745-27-19(F)** by failing to apply six inches of daily cover at the end of a day.
 - d. Respondent violated **OAC Rule 3745-27-08(C)(15)(e)** by failing to establish a dense vegetative cover on a section of the closed non-contiguous unit.
 - e. Respondent violated **OAC Rule 3745-27-19(J)(4)** by not preventing erosion.
- 15: In correspondence dated July 17, 1997 and August 7, 1997, Ohio EPA notified Respondent of the following violations of **OAC Rules 3745-27-60** and **3745-27-78** which were initially discovered during a Facility inspection conducted by Ohio EPA on June 12, 1997:
- a. Respondent violated **OAC Rule 3745-27-60(B)(6)(a)** by storing scrap tire shreds in piles exceeding 2500 square feet in basal area.
 - b. Respondent violated **OAC Rule 3745-27-78(C)(1)** by storing tires in any amount prior to use at a beneficial use site, unless the tires are stored in accordance with OAC Rule 3745-27-60(B).
 - c. Respondent violated **OAC Rule 3745-27-78(C)(2)** by storing more than 1000 tires in excess of thirty days.

16. In Director's Final Findings and Orders effective November 20, 1992, Ohio EPA noted in Finding of Fact No. 4(b) that Respondent had disposed of solid waste in a wooded area located on a portion of the north landfill unit, which was not approved for solid waste disposal in the Facility's 1969 Operational Plan. Order No. 2 of the 1992 Final Findings and Orders required Respondent to perform ground water monitoring activities in the "Wooded Area (depicted) on the Facility's 1969 Site development drawings." Respondent was required to close the "wooded area" pursuant to **OAC Rule 3745-27-I 1**, effective June 1, 1994. To date, Respondent has not certified proper closure of the "wooded area," depicted on sheet 3 of 10 of the Crawford County Landfill plan set approved by the Health Department on December 30, 1969 (December 1969 Plans) in violation of **OAC Rule 3745-27-I 1**.
17. Plan sheet 4D of the Facility's March 20, 1995 PTI No. 03-5722 depicts the approved lateral and vertical limits of waste placement. In a letter dated October 16, 1997, Ohio EPA clarified the Agency's position regarding the authorized lateral limits of waste placement. The letter stated in part, "The approved lateral limit of waste placement should be established based on the cap/liner tie-in. Ohio EPA expects this limit to be within the limit shown on the majority of the plan drawings in the approved PTI." Based on a review of the 1998 and 1999 Annual Reports, the existing contours on the out slopes of Phase I are on average three to five feet higher than the top of waste contours on plan sheet 4D of the Facility's PTI. In correspondence dated April 14, 1998, Ohio EPA notified Respondent that this overfill of solid waste was a violation of **OAC Rule 3745-27-19(C)**.
18. In correspondence dated April 11, 1997 and March 24, 1998, Ohio EPA notified Respondent of a violation of **OAC Rule 3745-27-19(C)** for a large overfill in the EIPTI area. To date, all of the overfilled solid waste in this area has been removed.
19. In correspondence dated August 16, 2000, Ohio EPA notified Respondent of a violation of **OAC Rule 3745-27-I 9(C)** for exceeding the Allowable Maximum Daily Waste Receipts on June 1, 2000. This violation was determined after Ohio EPA reviewed the monthly tonnage reports of the Facility.

V. ORDERS

The Respondent shall achieve compliance with ORC Chapter 3734. and the regulations promulgated thereunder according to the following compliance schedule:

1. Within ninety (90) days after the effective date of these Orders, all employees of the Facility shall be trained and have thorough knowledge of all authorizing documents, including the Facility's March 20, 1995 PTI No. 035721. Employees shall also be trained and have thorough knowledge of the operational requirements as outlined in OAC Rule 3745-27-19. Within thirty (30) days after the training program has

ended, Respondent shall provide written documentation to Ohio EPA that all employees have gone through the training program.

2. Within ninety (90) days after the effective date of these Orders, the Respondent shall submit a written response to the March 24, 1999 NOD referenced in Section IV, Findings of Fact, Paragraph 8 of these Orders and completely address all deficiencies noted in Ohio EPA's March 24, 1999 letter.
3. Within thirty (30) days after the effective date of these Orders, Respondent shall revise its Ground Water Detection Monitoring Plan as detailed in the correspondence from Ohio EPA dated January 27, 2000, attached hereto and incorporated herein as Attachment A.
4. Within sixty (60) days after the effective date of these Orders, Respondent shall complete an investigation of monitoring well P-8 for turbidity and submit to Ohio EPA a report summarizing the findings of the investigation and the measures Respondent intends to implement to remedy turbidity problems. Respondent shall implement measures necessary to remedy turbidity problems for monitoring well P-8 within ninety (90) days after the effective date of these Orders.
5. Beginning thirty (30) days after the effective date of these Orders and continuing for a period of not less than two years from the effective date of these Orders, Respondent shall submit monthly reports to the Ohio EPA, unless specified in writing from Ohio EPA. These reports shall contain, at a minimum, the following information:
 - a. A narrative summary describing Respondent's efforts to comply with these Orders;
 - b. A narrative description of Respondent's efforts to maintain compliance with the Facility's authorizing documents and all applicable regulations, including but not limited to:
 - i. A narrative description of Respondent's efforts to maintain the smallest practical working face at the Facility;
 - ii. A narrative description of Respondent's efforts to monitor, maintain and remedy erosion, ponding and deterioration of the engineered components of the Facility; and
 - iii. A narrative description of Respondent's efforts to maintain adequate daily and intermediate cover at the Facility.

6. Within thirty-six (36) months after the effective date of these Orders, Respondent shall:
 - a. attain compliance with the lateral and vertical limits of solid waste placement as specified in the March 20, 1995 PTI No. 03-5721; or
 - b. obtain the necessary authorizations from Ohio EPA to alter the approved vertical or horizontal limits of waste placement.

7. Within ninety (90) days after the effective date of these Orders, Respondent shall submit a closure/post-closure plan to the Ohio EPA for review and comment which addresses concerns relative to the southwest portion of the north landfill unit known as the "wooded area," as defined on sheet 3 of 10 of the December 1969 Plans. The closure/post-closure plan shall include, at a minimum, the following information:
 - a. The closure/post-closure plan for the "wooded area" shall describe what Respondent intends to do to properly close this portion of the Facility, including construction of a cap system pursuant to OAC Rule 3745-27-1 I(G), and shall include a schedule for completion of planned activities. The schedule shall, at a minimum, require that construction of the final cap system on the "wooded area" be completed by no later than three hundred forty-five (345) after the effective date of these Orders. In addition, the schedule shall require that within thirty (30) days of completing construction of the final cap system on the "wooded area", Respondent shall submit to Ohio EPA a construction report for the final cap system on the "wooded area," as depicted on plan sheet 3 of 10 of the December 1969 Plans, in accordance with OAC Rule 3745-27-08(H).
 - b. The closure/post-closure plan shall also contain a detailed history of Respondent's past filling activities in the "wooded area." This detailed history shall, at a minimum, include documented proof of when Respondent ceased disposing of solid waste in the "wooded area." This information is the same as the information requested in OAC Rule 3745-27-1 1 (H)(5)(a) and (b).

8. Within thirty (30) days after receiving comments from Ohio EPA on the closure/post-closure plan for the "wooded area" noted in Order 7 of these Orders, Respondent shall submit a revised closure/post-closure plan to Ohio EPA addressing all of Ohio EPA's comments. Upon approval of the revised closure/post-closure plan for the "wooded area" by Ohio EPA, Respondent shall implement the approved closure/post-closure in accordance with the schedule contained within the approved plan.

9. Respondent shall perform the following measures in settlement of Ohio EPA's claims for civil penalties which may be assessed pursuant to ORC Chapter 3734:
 - a. Within thirty (30) days after the effective date of these Orders, Respondent shall pay Ohio EPA the amount of \$20,000.00 for deposit in the Hazardous Waste Clean-up Fund created under ORC Section 3734.28. Payment shall be made by tendering a certified check, made payable to "Treasurer, State of Ohio," in the stated amount to Ohio EPA, Attention: Vicki Gaiilei, Office of Fiscal Administration, P.O. Box 1049, Columbus, Ohio 43216-1049, and by submitting a copy of the check to Mr. Jeff Hurdley, Legal, Ohio EPA.
 - b. Within thirty (30) days after the effective date of these Orders, Respondent shall pay the Crawford County Solid Waste Management District at least \$40,000.00 for the purchase of three (3) trailers to be used by the Crawford County Solid Waste Management District to expand curbside recycling in the City of Bucyrus and possibly other locations in Crawford County. Respondent shall obtain from the Crawford County Solid Waste Management District a copy of receipts for the purchase of each trailer and shall provide Ohio EPA with a copy of such receipts within sixty (60) days after the purchase of all of the trailers.
 - c. Beginning this year and continuing annually thereafter for a period of five (5) years, Respondent shall arrange and pay for mosquito treatments at a facility known as Moyer's Auto Wrecking, Inc., which is located at 735 Bauer Avenue, Crestline, Ohio. The mosquito treatments required by this paragraph shall be performed in accordance with the requirements of OAC Rule 3745-27-60(B)(8)(b), and Respondent's obligation to pay for mosquito treatments under this paragraph shall not exceed \$24,080.00. Each time a mosquito treatment required under this paragraph is made, Respondent shall provide Ohio EPA with a copy of the invoice and receipt for that mosquito treatment within thirty (30) days after the completion of that mosquito treatment.

VI. TERMINATION AND SATISFACTION

Respondent's obligations under these Orders shall terminate when the Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA, Division of Solid and Infectious Waste Management, that all obligations under these Orders have been performed and Ohio EPA, Division of Solid and Infectious Waste Management, acknowledges, in writing, Ohio EPA's acceptance of this certification and demonstration.

This certification shall be submitted by the Respondent and shall be signed by the Crawford County Commissioners. The certification shall make the following attestation:

"We certify that the information contained in or accompanying this certification is true, accurate and complete."

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership, corporation or other entity, not a signatory to these Orders, for any liability arising out of or relating to the operation of Respondents Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these 'Orders shall be undertaken in accordance with the requirements of all applicable federal, state, and local laws and regulations. Nothing in these Orders shall be construed as waiving or compromising in any way the applicability and enforcement of any other statutes or regulations applicable to the Respondent's operation of the Facility. Ohio EPA reserves all rights and privileges except as specified herein.

IX. NOTICE

All documents demonstrating compliance with these Orders and all other documents required under these Orders to be submitted to the Ohio EPA shall be addressed to:

Ohio Environmental Protection Agency
Northwest District Office
Division of Solid and Infectious Waste Management
Attn: Group Leader, DSIWM
P.O. Box 466
347 North Dunbridge Road
Bowling Green, OH 43402

and

Crawford County Health Department
Attn: Health Commissioner
112 East Mansfield St.
Courthouse
Bucyrus, OH 44820

or to such persons and addresses as may hereafter be otherwise specified in writing by the Ohio EPA.

X. RESERVATION OF RIGHTS

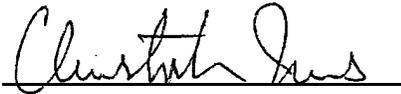
Nothing contained herein shall be construed to prevent Ohio EPA from seeking legal or equitable relief to enforce the terms of these Orders or from taking other administrative, legal or equitable action as deemed appropriate or necessary, including penalties against Respondent for noncompliance with these Orders.

Nothing contained herein shall be construed to prevent Ohio EPA from exercising its lawful authority to require the Respondent to perform additional activities pursuant to ORC Chapter 3734. or any other applicable law in the future. Nothing herein shall restrict the right of Respondent to raise any administrative, legal or equitable claim or defense with respect to such further actions which Ohio EPA may seek to require of Respondent. Nothing in these Orders shall be construed to limit the authority of Ohio EPA to seek relief for violations not addressed in these Orders.

XI. SIGNATORIES

Each signatory to these Orders certifies that he or she is fully authorized to enter into the terms and conditions of these Orders and to legally bind Respondent to this document.

IT IS SO ORDERED:



Christopher Jones, Director
Ohio Environmental Protection Agency

6-15-01
Date

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only those violations addressed in these Orders, Respondent agrees that these Orders are lawful and reasonable, that the items and time frames provided for compliance herein are reasonable and that the Respondent agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations cited herein.

Respondent hereby waives the right to appeal the issuance, terms, service and implementation of these Orders, and Respondent hereby waives any and all rights it may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that in the event that these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated, or modified.

IT IS SO AGREED:

Crawford County Commissioners

By: Barbara Blackford
Crawford County Commissioner

6-07-01
Date

By: Mo Renallet
Crawford County Commissioner

6-07-01
Date

By: Conner
Crawford County Commissioner

6-7-2001
Date

Ohio Environmental Protection Agency

Christopher Jones
Christopher Jones
Director

6-15-01
Date