



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center  
122 S. Front Street  
Columbus, OH 43215-1099

TELE: (614) 644-3020 FAX: (614) 644-2329

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

JUN 21 2001

Wood County Board of Commissioners  
Wood County Landfill  
One Courthouse Square  
Bowling Green, Ohio 43402

OHIO E.P.A.  
JUN 21 2001  
ENTERED DIRECTOR'S JOURNAL

Re: **Wood County Landfill, Wood County  
Alternative Daily Cover Final Approval**

Dear Commissioners:

On October 30, 2000, the Division of Solid and Infectious Waste Management (DSIWM) at Ohio EPA, Northwest District Office (NWDO) received your written request for authorization to use an alternative daily cover material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3) at the Wood County Landfill (Facility) in Wood County. Specifically, in the referenced request, the owner/operator is seeking authorization to continue the use of ProGuard Single Bag (ProGuard SB) beyond the one hundred eighty (180) day trial period established in a previous authorization dated January 3, 2001.

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 a letter dated January 3, 2001, Ohio EPA, NWDO granted to the owner/operator permission to use ProGuard SB as alternative daily cover material at the Facility for a one hundred eighty (180) day trial period. During this period, the performance of the material was monitored by Ohio EPA, NWDO and the Wood County Health Department to determine the material's effectiveness and its ability to function in the manner intended. Additionally, as required by the aforementioned authorization, the owner/operator submitted a report to Ohio EPA, NWDO. This report details the performance of ProGuard SB as daily cover during the trial period.

In your written correspondence dated April 30, 2001, you requested final authorization to use ProGuard SB as alternative daily cover material on an on-going basis at the Facility. Based on the results of Ohio EPA's monitoring and the information contained in the report discussed in the paragraph above, Ohio EPA has determined that ProGuard SB functioned effectively as an alternative daily cover material at the Facility. Therefore, pursuant to OAC Rule 3745-27-19(F)(3), I hereby authorize the owner/operator of the Wood County Landfill to use ProGuard SB on an on-going basis as daily cover material at the Facility. This approval is subject to the following conditions:

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

Official document as filed in the records of the Ohio Environmental Protection Agency.  
Date 6/21/01

### CONDITIONS

1. This authorization is limited to the use of only ProGuard SB at the Wood County Landfill. No other alternative daily cover material may be used at the Facility without prior authorization from Ohio EPA.
2. The owner/operator shall place ProGuard SB 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, insect and rodents.
3. If inclement weather conditions will render the placement or use of ProGuard SB 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 ProGuard SB 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). 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. The owner/operator shall notify Ohio EPA, NWDO and the Wood County Health Department of this action by the end of the next working day, and shall submit written notification to Ohio EPA, NWDO not later than fourteen (14) calendar days after use has ceased. This notification is not necessary if the use of ProGuard SB ceases on a temporary basis in accordance with Condition No. 3.
5. If Ohio EPA or Wood County Health Department determines that the use of ProGuard SB is ineffective or unsatisfactory under normal operating conditions, then permission to use the material may be revoked upon written notification from the director. Immediately upon such revocation, the owner/operator shall cease to use ProGuard SB as alternative daily cover 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 25,000 square feet of the working face covered with alternative daily cover material. This amount represents the maximum area of the Facility that can be covered with alternative daily cover material at any one time. This maximum area applies to the use of ProGuard SB 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 maintain a well compacted working face to minimize the surface area of exposed waste. At a minimum, ProGuard SB shall be applied from four opposing sides of the working face to form a complete uninterrupted cover.
8. The owner/operator shall not apply ProGuard SB during a rainfall event. In the event that precipitation renders ProGuard SB ineffective, prior to or following normal curing, another application of ProGuard SB or other approved alternative daily cover, or six (6) inches of conventional soil cover, shall be applied in accordance with OAC Rule 3745-27-19(F).
9. The owner/operator shall keep a record of the volume of ProGuard SB applied and the size of the area covered on a daily basis. These records shall be kept on site and be made available for inspection by Ohio EPA or the Wood County Health Department.
10. ProGuard SB shall not be used as intermediate or final cover. Any solid waste disposal area which remains inactive for a period of five (5) days and is covered with ProGuard SB 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 fifth day.

END OF CONDITIONS

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.

Wood County Landfill  
Alternative Daily Cover Final Approval  
Page 4 of 4

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 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 the 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 Ben Smith at 419-373-3062.

Sincerely,



Christopher Jones, Director

pc: Ben Smith, Ohio EPA, NWDC  
Scott Hester, Ohio EPA, CO  
Brad Espen, Wood County Health Department  
Ken Vollmar, Wood County Landfill