



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

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

MAILING ADDRESS:

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

February 5, 2008

Jason El-Zein, Chief
Emergency Response Branch #1
United States Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

RE: Countywide Landfill
East Sparta, Stark County, Ohio

Dear Mr. El-Zein:

This is in regards to your correspondence of January 22, 2008, to Republic Services of Ohio, LLC (Republic) wherein you provide formal notice to Republic of the United States Environmental Protection Agency's (US EPA) interest in the Countywide Landfill. You note in your letter that US EPA has been supporting Ohio EPA's efforts to address the current problems at the landfill and that US EPA plans to continue supporting Ohio EPA in our ongoing efforts. The purpose of this letter is to formally thank US EPA for its support of Ohio EPA as well as to request additional assistance for certain activities related to the landfill in particular.

It is encouraging to me that our respective Agencies have been able to work well together to address the problems presented by the fire occurring at the Countywide Landfill. As you know, several members of your staff have been working with Ohio EPA since March of last year to address the problems at the landfill. For example, Dr. Thabet Tolyamat of your Agency has provided very useful insight on the dewatering well remedial alternative which I recently ordered Republic to implement. It is anticipated that through the implementation of the dewatering well orders and the installation of the large relief wells, we will remove a significant amount of liquid from the landfill, slow the aluminum dross reaction and contribute to the stabilization of the landfill so that other remedial options can be selected and implemented. My staff will be monitoring the effectiveness of this remedy, and I have directed them to keep your staff informed of developments. I would value US EPA's input regarding whether this remedial alternative should be expanded, modified or discontinued as data comes in from the

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

implementation of this remedial alternative. In addition, I would value your assistance with another remedial alternative Ohio EPA has been investigating.

In October of 2007, I directed Republic to install a fire break between cells 8A and 8B of the landfill to prevent the migration of the fire at the landfill into areas planned for future waste disposal. Following the selection of this remedial alternative, my staff investigated whether an additional fire break should be constructed further back into areas of the landfill where waste had already been disposed. My staff assembled and analyzed data from the landfill to determine whether an additional fire break should be installed between the original 88 acre landfill area (in the vicinity of cell 5) and cell 7. Enclosed is a summary and analysis of the data that my staff compiled. The data reveals trend lines which suggest that the fire is migrating north from the area in the original 88 acre landfill where the reaction started toward cells 7 and 8A, but that we do have a window of time to install a fire break between cell 5 of the original 88 acre landfill and cell 7. It is my understanding that our staffs have discussed this situation and that your technical staff believes that a fire break should be installed between cell 5 and cell 7.

Based upon the data my staff has assembled and the recommendation of your technical staff as well as my own that a fire break should be installed, I am inclined to order Republic to promptly install an additional fire break. However, my staff informs me that this work would require technical resources which are currently not at our disposal. Consequently, we would need to assemble these resources. But in doing so, we would lose precious time in moving to install the fire break promptly and during the winter if at all possible in order to lessen the impact of potential odors. Given this situation, I would request that US EPA consider requiring Republic to install a fire break under US EPA's technical oversight and with the assistance of landfill fire experts US EPA has used in past fire excavation projects, or mobilize a contractor to install the fire break. I have directed my staff to provide you with any information and assistance regarding this situation that you may require.

In addition to US EPA's assistance with the fire break excavation work, I would appreciate US EPA's assistance regarding certain other matters related to the landfill. In your letter of January 22nd, you indicate that US EPA plans to conduct activities at the landfill which may include, among other things, the following:

The installation and maintenance of an effective/efficient explosive-gas extraction and treatment system to effectively control emissions of gases into the atmosphere;

Development and implementation of a comprehensive ambient air monitoring system including sampling to ensure protection of human health; and

Assessment and control of releases and/or threats of releases of hazardous substances, pollutants, or contaminants to surface water and ground water from the facility.

Ohio EPA has undertaken efforts to protect human health and the environment from releases to the air and water at the landfill and is considering taking additional actions. However, I would very much welcome US EPA's review of these matters in particular to ensure that all appropriate action is taken to ensure protection of human health and the environment. As mentioned above, our staffs have worked well together on a host of issues related to the landfill, and I want this good working relationship to continue. Toward this end, my staff is available to provide information regarding investigations and efforts that have already been taken as well as those that are being considered.

Again, I appreciate US EPA's support of the efforts Ohio EPA has undertaken so far to address these problems, and look forward to working closely with US EPA to complete the work that has already begun.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Korleski". The signature is fluid and cursive, with a large initial "C" and "K".

Chris Korleski, Director
Ohio EPA