



Countywide Recycling & Disposal Facility

Division of Republic Waste Services of Ohio
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Ohio Environmental Protection Agency
Northeast Region Office
2110 East Aurora Rd.
Twinsburg, Ohio 44087

May 5, 2008

Attn: Mr. Phil Rhodes, P.E.
Environmental Engineer
Division of Surface Water

Dear Mr. Rhodes:

This letter provides the information requested by Josh Adams while he was on-site at Countywide on April 30, 2008. Although Countywide is continuing to evaluate the situation, this letter contains a summary of the events as they are understood at this time. To the extent that further evaluation reveals information that is different than the information that is provided in this letter, Countywide will supplement this submission.

It is important to note that no leachate was discharged or managed in any area outside the facility boundary. Thus, the facility complied with both its NPDES permit and the operational criteria for landfills contained in the Ohio Administrative Code.

Summary of Events

At approximately 10:00 AM on Monday, April 28, workers at Countywide observed leachate outbreak that may have impacted sedimentation pond No 1A. Initial investigations suggest that, sometime between Saturday (April 26) afternoon, and Monday (April 28), an unknown quantity (probably between 200 to 5,000 gallons) of leachate moved down a surface water channel and up to, and possibly into sedimentation Pond 1A.

Countywide has found that the synthetic cap permits condensation to occur on the underside of the cap, and also tends to funnel subcap leachate outbreaks into the zone between the top of the soil cover and the bottom of the synthetic cap. This liquid then runs along that interface to a low point and is normally collected in a drain or sump at the low point.

However, recent construction activities just west of the main access road inadvertently blocked the normal interface flow path to the collection point; these same construction activities may have resulted in the pinholes in the HDPE cap that were later discovered. The blocked liquid accumulated and formed a "pillow" of leachate under the temporary cap that over the weekend wept up through the nearby pinholes. The quantity of leachate released is unknown because the leakage process was slow but steady, over an unknown duration, that began no earlier than Saturday afternoon.

Released liquid then ran over the synthetic cap, through the rock-lined ditch (north of Cell 4 and east of Cell 7), through a culvert, and then into sedimentation Pond 1A. There was no evidence of any release of impacted surface water from the facility. In fact, as mentioned above, Pond

1A's water level was well below discharge level. Thus, Countywide is confident that no leachate was discharged from the pond.

Actions Taken

Upon discovery of the leachate outbreak, several actions were taken, including but not limited to:

- Prohibiting discharge from Pond 1A (a "pig" was inserted into the discharge pipe immediately upon discovery even though the pond's water level was well below discharge level)
- Using a vacuum truck and hoses to collect and prevent further release, and to clean and remove impacted liquid from affected drainage ditches.
- Repairing the leachate outbreak, by patching over the perforations in the synthetic cap, and by constructing a gravel "sump" to allow liquid that accumulates in that area to infiltrate down into the waste mass in the future.
- Diverting additional stormwater from accumulating in Pond 1A until such time that it is determined that normal use of the sedimentation pond can resume.
- Sampling and analysis of water from Pond 1A to determine if, in fact leachate impacted the water quality in the sedimentation pond. Initial results indicated that the pond water quality was impacted.
- Evacuation of water from Pond 1A in light of predicted rain in order to prevent discharge
- Disposal of water evacuated from Pond 1A at a permitted wastewater facility

Actions to be Taken

As of this time, Countywide has completely evacuated the free liquid in the pond and shipped it to a permitted wastewater treatment plant. In addition, Countywide is developing a plan to remove some or all of the sediment remaining prior to allowing further surface water entry.

If you have any additional questions, please do not hesitate to contact me at 330-874-3855.

Sincerely,



Tim Vandersall, P.E.
General Manager

Cc: Kurt Norris
Josh Adams
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