



Countywide RDF

3619 Gracemont Ave. S.W.
East Sparta, Ohio 44626

February 22, 2008

Ohio Environmental Protection Agency
Central Office
Division of Air Pollution Control
Attn: DAPC Enforcement Coordinator
PO Box 1049
Columbus, OH 43216-1049

RE: Submittal of Work Plan per February 7, 2008 Director's Orders

Enclosed please find the workplan for additional air testing specified in Order 1G of the Director's February 7, 2008 Orders.

Please contact me with any questions.

Tim M. Vandersall, PE
General Manager

**Plan for Sampling for Polychlorinated Dibenzo-p-Dioxins and Dibenzofurans in
the Vicinity of Countywide Recycling & Disposal Facility
February 22, 2008**

Pursuant to Order 1 of Ohio EPA Director's Final Findings and Orders (DFFO) issued on February 7, 2008, Lawhon & Associates, Inc. (L&A) on behalf of Countywide RDF has developed this plan for sampling air for the presence of polychlorinated dibenzo-p-dioxins and dibenzofurans (PCDD/PCDF). The DFFO specifies the basic protocol for sampling and analyzing of ambient air for PCDD/PCDF, and for evaluating the laboratory results. This plan summarizes the steps that Countywide RDF proposes to take to comply with this Order.

1.0 Monitoring Locations

1.1 L&A will collect air samples for PCDD/PCDF analysis one time per month at each of the four (4) ambient air monitoring locations currently being used as part of the ambient air monitoring network created in accordance with Order 5.A of the March 2007 Orders. These monitoring locations are: the Bolivar Elementary School approximately 1.5 miles to the south west of Countywide RDF; the Cell Tower on the southwest portion of the Countywide RDF facility; the KOA campground on Downing Street; and a location in the publicly-owned wetland area between Dueber Avenue and the eastern slope of the landfill. (DFFO, V.1.A., February 7, 2008).

1.2 In addition to the four sampling sites referred to in Order 1.A of these Orders, it is proposed that the fifth secure sampling site specified by the DFFO shall be located on Krisko Avenue to the northwest of Countywide RDF. The purpose of this fifth site is to provide background data for ambient air dioxin compounds away from the landfill, and taking into account the known dioxin emissions from mobile sources traveling on Interstate I-77. This proposed fifth monitoring site is located along a line perpendicular to the west of Interstate I-77, 5.2 miles from the Countywide RDF facility property line and approximately the same distance from the interstate as the Bolivar Elementary School. The location on Krisko Circle was selected because it meets the criteria specified in the DFFO and because it is on a relatively secure commercial property. The attached Figure shows the location of this proposed fifth monitoring site. (DFFO, V.1.B., February 7, 2008).

2.0 Sampling and Analysis Methods

2.1 L&A will conduct sampling for PCDD/PCDF to with the ongoing monitoring previously required by Order 5.A of the March 2007 Orders with the exception that sampling for PCDD/PCDF will occur one time per month rather than every six days. The actual schedule for PCDD/PCDF sampling will be developed as soon as the Agency approves this plan. Countywide RDF proposes to perform the sampling and analysis for PCDD/PCDF one time per month for three consecutive months. (DFFO, V.1.C, February 7, 2008.)

2.2 L&A will collect air samples for PCDD/PCDF analysis for a period of 24-hours to obtain proper sample volume and mass (at the prescribed flow rate) using high-volume sampling machines fitted with polyurethane foam (PUF) sorbent filters. The devices for PCDD/PCDF will be co-located with the summa canister and sorbent tube sampling apparatus. (DFFO, V.1.D., February 7, 2008).

2.3 Samples of dibenzo-p-dioxins and furans will be analyzed in accordance with the method described in U.S. EPA Compendium Method TO-9A [EPA/625/R-96/010b], which includes analysis for total mass by chlorine class, as well as the 2,3,7,8-chlorinated dioxins and furans. Concentrations above the reportable quantities (detection limits) of the method shall be reported to the picogram level in concentration. For the sake of consistency, the PUF canisters will be delivered to Integrated Analytical Laboratories (IAL) along with the other samples collected during that same monitoring event. IAL then proposes to forward the samples to an affiliated independent contract laboratory that is certified to run the Method TO-9 PCDD/PCDF analysis. (DFFO, V.1.E., February 7, 2008).

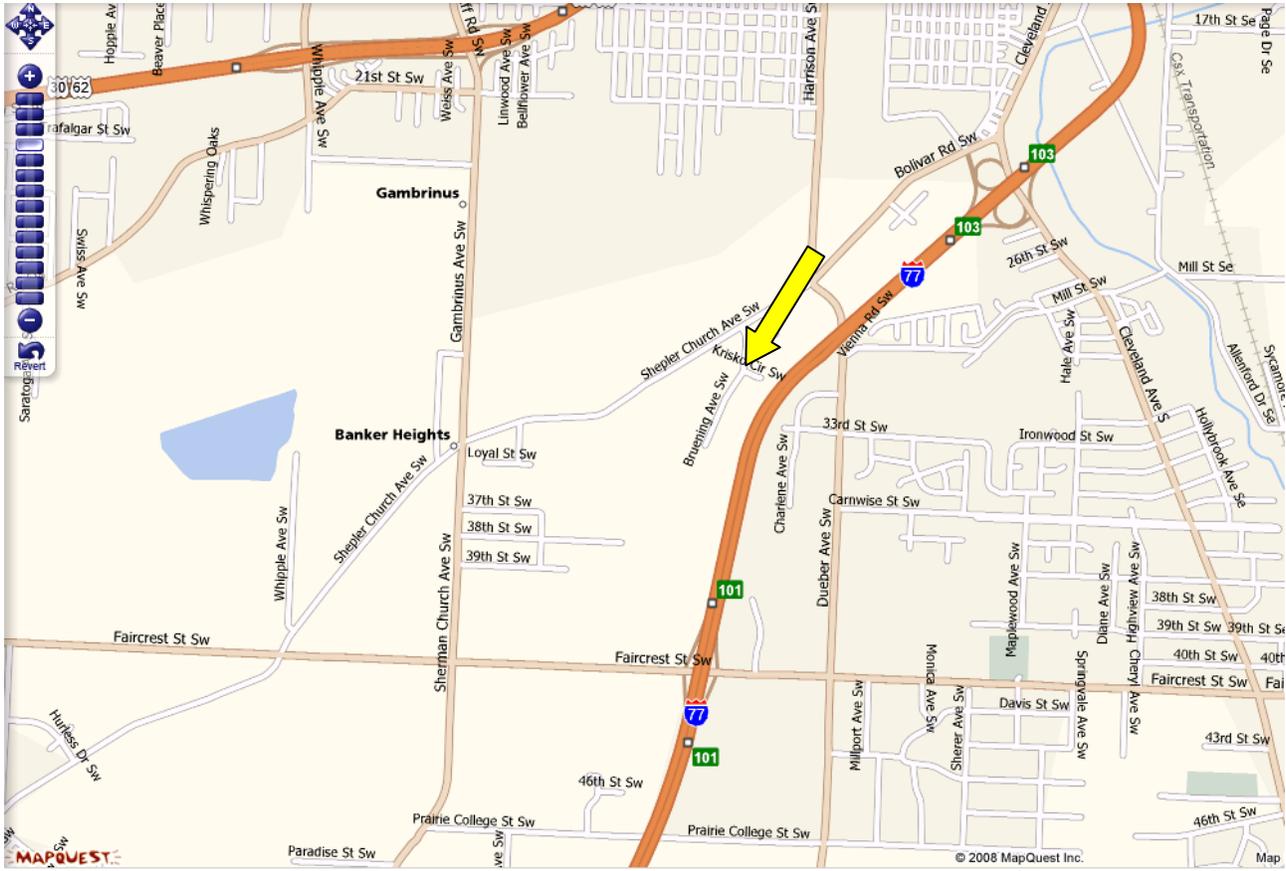
2.4 L&A will conduct the first sampling event for PCDD/PCDF within 15 days after being notified by Ohio EPA of the Agency's approval of this plan. (DFFO, V.1.G., February 7, 2008).

3.0 Evaluation of Laboratory Findings

3.1 L&A will conduct a risk analysis of the analytical findings in accordance with the U.S. EPA Toxic Equivalency Factors (EPA/625/3-89/016) method, which relates all toxicity values of the various dioxin and furan congeners to the toxicity of 2,3,7,8-tetrachloro-p-dioxin (2,3,7,8-TCDD). The concentrations of any PCDD/PCDF congeners that are detected will be converted to 2, 3, 7, 8-TCDD equivalents and added together to obtain a total concentration for the purposes of evaluating potential risk. The TCDD equivalent concentration for each sample will then be compared to the EPA Region 9 PRG of $4.5E-08$ ug/m³. In the Quarterly Report, the specific congeners that are detected will also be evaluated in the context of available information from other air quality investigations. (DFFO, V.1.F., February 7, 2008).

4.0 Reporting

4.1 L&A will include the analytical results and risk analysis for PCDD/PCDF samples in the next monthly report after the results are received from the laboratory. A detailed discussion of findings and a risk analysis will be included in the Quarterly Report submitted in accordance with Order 5.A. of the March 2007 Orders. (DFFO, V.1.H., February 7, 2008).



Online Office

Approximate location for fifth monthly PCDD/PCDF sampling - Krisko Circle