



Countywide Recycling & Disposal Facility

Division of Republic Services of Ohio II, LLC
3619 Gracemont Street S.W.
East Sparta, Ohio 44626
Phone: 330-874-3855
Fax: 330-874-2426

July 1, 2008

Ohio Environmental Protection Agency, Central Office
Division of Solid and Infectious Waste Management
Attn: Mr. Ed Gortner
PO Box 1049
Columbus, Ohio 43216-1049

RE: WRITTEN DEMONSTRATION FOR GAS WELLS WITH OXYGEN EXCEEDANCES
INITIAL EXCEEDANCE PERIOD WEEK OF JUNE 16, 2008
ORDER 4.B.2, DIRECTOR'S FINAL FINDINGS AND ORDERS OF MARCH 28, 2007
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

On June 19, 2008, one (1) landfill gas (LFG) extraction well had an initial oxygen exceedance over 1.5% which was not able to be brought into the target range within 14 days. Therefore, Countywide hereby submits this written demonstration for landfill gas extraction well exceedances as required by Order 4.B.2, which states:

"If corrective measures undertaken by Respondent fail to lower the oxygen levels within the gas extraction well to 1.5% oxygen by volume, Respondent shall submit a written demonstration to Ohio EPA not later than 14 days after Respondent's initial discovery of the landfill gas extraction well exceedance which explains why a given landfill gas extraction well or wells cannot meet the 1.5% oxygen by volume target goal. The demonstration shall further document in detail all of the corrective measures undertaken by Respondent to achieve the 1.5% by volume level since the exceedance. Respondent's written demonstration may further request an alternative oxygen concentration."

The one LFG well identified during this time period is noted in Table 1, below.

Table 1
LFG Wells with Greater than 1.5% Oxygen On June 16, 2008
For Which Written Demonstration is Required

Well ID	Date of Initial Exceedance	Initial Oxygen Content	Oxygen Content As Of July 1, 2008
PW-133	6/19/2008	3.7%	9.7%

Required corrective actions were taken as described in Table 2, however this LFG well is still exhibiting oxygen concentrations above 1.5% by volume.

Table 2
Corrective Actions Taken
And Reason Mandated Oxygen Content Not Achieved

Well ID	Corrective Actions Taken	Reason 1.5% Level Not Achieved
PW-133	Nominal vacuum adjustments, assessed well integrity and made repairs as appropriate, performed depth to fluid and depth to bottom measurements.	Well integrity investigation showed that the well is blocked below grade at 10.7 feet. The well is located in an area where settlement and lateral deformation is occurring as a result of the reaction, and this settlement has likely caused the casing to pinch above the perforations.

A complete historical record of the corrective actions taken by Countywide for this LFG well is provided in Attachment A. Chronological listing of oxygen content readings taken on this LFG well is provided in Attachment B.

Countywide proposes a timeline to correct the oxygen exceedance at this LFG well as shown in Table 3.

Table 3
Proposed Timeline to Achieve 1.5% Oxygen Content

Well ID	Requested Timeline for Correction
PW-133	October 4, 2008 (120 days from initial exceedance) to perform additional corrective actions, expand the system or decommission the well.

Countywide does not believe that the source of oxygen for this LFG well is a result of over pull, nor is the oxygen being introduced into the waste mass. Instead we believe the air is vapor locked in the casing as a result of the pinch above the perforations.

Please note that if Countywide is not able to achieve the required 1.5% oxygen concentration as a result of additional corrective actions within the timelines requested in Table 3, Countywide may request higher operating parameters for this LFG well, expand the system, or decommission the well if necessary. Countywide believes this request is in accordance with the federal NSPS regulations and our Title V operating permit. In addition Countywide will continue to monitor this LFG well as required and continue working to achieve 1.5% or less oxygen concentration for this and all other LFG wells.

Please feel free to call me should you have any questions.



Tim Vandersall, P.E.
General Manager

Attachments:

Attachment A - Well Assessment and Repair Logs
Attachment B - Chronological Oxygen Content Readings

cc: Bill Skowronski - OEPA-NEDO
Kirk Norris - SCHD
Dan Aleman - CCHD
Todd Hamilton - CWRDF
Kyle Nay, Bruce Schmucker, Mike Contestabile - Cornerstone
Bob Caron, Randy Everett, Janet Todia - AEG
Jason Perdion - B&H
Jim Walsh - SCS Engineers
Mike Beaudoin - Earth Tech

Attachment A
Historical Record of Corrective Actions



PRIORITY RESPONSE TO > 1.5% O2 LFG WELL READING

Well Identification: PW-133

Date: 6-19-08 Time: 1108 of initial discovery of > 1.5% oxygen
 Technician: Mike Burt 3.7 % O2 non-compliant reading

Possible Issue(s): unknown

Yes No N/A
 Nominal vacuum adjustments "appropriate and reasonable reductions in vacuum"

Date: 6-19-08 of AEGL O&M Well Integrity Assessment (below)

Technician: Mike Burt

Yes	No	N/A		Yes	No	N/A		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is well labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is well lateral / header in good condition?	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is well head remote?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is lateral or header line surging?	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is well hard piped?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is the well surging?	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are all sample ports in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is well boot (liner) in good condition?	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are all flanges in good condition?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Is well bore (soil) in good condition?	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Are all other connections in good condition?	Yes	No	N/A		
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Is well valve in good condition?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Compliance achieved?	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Is the well kanaflex in good condition?				_____ Date compliance achieved?	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is there a pump in the well?				_____ % O2 compliant reading	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Does pump require service?					
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is well casing in good condition?					
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Miscellaneous - please describe _____					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nominal vacuum adjustments "appropriate and reasonable reductions in vacuum"					

Date: 6-25 of AEGL O&M Well Integrity Repairs & Investigation

Technician: Thomas Philias

Description on noted issue(s): well casing pinched below ground

Repair Summary:

Yes	No	N/A		Yes	No	N/A		
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Wellhead ports / fittings / connections repaired/replaced?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Compliance achieved?	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Wellhead Kanaflex repaired or replaced?				_____ Date compliance achieved?	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Reviewed 3-months monitoring data for O2 trends (attach copy)					_____ % O2 compliant reading
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Well casing integrity checked with dummy?					
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Wellhead valve replaced or repair?					
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Miscellaneous repaired or replaced? - please describe _____					
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Nominal vacuum adjustments "appropriate and reasonable reductions in vacuum"					
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Review logs for original pipe lengths installed?					

Solid 20 ft.
 Perforation 87 ft.
 DTB 10.7 ft.
 DTF 8.7 ft.

Additional Comments: Pipe is pinched below ground at 10.7 feet.

Attachment B
Chronological Oxygen Content Readings

Attachment B
Chronological Oxygen Content Readings

GEM ID	As-built ID	Date Time	O2 %
CTYPW133	PW-133	#####	3.7
CTYPW133	PW-133	#####	3.7
CTYPW133	PW-133	#####	8.4
CTYPW133	PW-133	#####	6.9
CTYPW133	PW-133	6/25/2008 8:40	6.2
CTYPW133	PW-133	6/25/2008 8:44	6.4
CTYPW133	PW-133	#####	10
CTYPW133	PW-133	#####	9.7