



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

March 28, 2007

Jason Perdion
Baker & Hostetler LLP
3200 National City Center
1900 East 9th Street
Cleveland, Ohio 44114-3485

Re: Ambient Air Monitoring at Countywide Landfill

Dear Jason:

The following are the elements of the ambient air sampling that the Ohio EPA is identifying pursuant to Section V, Paragraph 5A of the Director's Final Findings and Orders, dated March 28, 2007:

Parameters and test methods:

Countywide shall sample for:

Volatile Organic Compounds (VOCs) using USEPA method T0-15.

Aldehyde/ketone compounds using USEPA method T0-11A.

Carbonyl compounds using USEPA method T0-11A.

Sulfur compounds using American Society of Testing & Materials (ASTM) method 5504.

Hydrogen fluoride and hydrogen chloride using National Institute for Occupational Safety and Health (NIOSH) test method 7903.

For each parameter class and for each sampling event Countywide shall sample for a sample collection duration of 24 hours. For each parameter class, Countywide may propose an equivalent, alternative sampling method or duration, provided the method or duration is sufficient to allow Ohio EPA to evaluate both acute and long-term health effects. Countywide may use the alternative sampling method or duration if approved by the Director in writing.

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

Ohio EPA is an Equal Opportunity Employer

The director may add to this list of parameters based upon information obtained from investigations conducted pursuant to the March 28, 2007 Findings and Orders, or obtained from any other source.

Frequency

Sampling shall occur once every 6th day for each parameter. The sampling frequency for a parameter class (e.g., VOCs, aldehydes/ketones, etc.) can be reduced to monthly (i.e., every 30th day) for the parameter class, if:

- for four consecutive six-day samplings for the given parameter class, for all the measured values for the parameter class at all sampling sites:
 - no measured pollutant value is above the minimum detection limit of the analysis method; or
 - the measured values demonstrate both no acute or chronic (short-term or long-term) risk to human health, safety or the environment; and
- Countywide receives written approval of the Director to reduce sampling frequency.

Where monthly sampling measurements demonstrate a risk to human health, the Director may require Countywide to resume six-day sampling for the given parameter class.

Sampling sites

Countywide shall sample ambient air at three sites initially and, after modeling, at four sites at a minimum. The initial three sites shall include: (1) the elementary school in Bolivar or nearby site; (2) near the T-Mobile cell phone tower on the landfill property; and (3) a third site northeast of the landfill to be determined by Countywide. Countywide shall conduct air modeling to identify sites for more permanent locations that supplement and may replace the initial third, northeast site. Ohio EPA anticipates requiring two such sites, one in the primary prevailing downwind direction from the landfill, and one in a secondary downwind direction (i.e., for a total of four sites, the school site, the cell tower site, and the two prevailing downwind sites). Modeling may also indicate that the initial third, northeast site should remain as one of the downwind sites. Modeling shall be done using USEPA-approved models. The modeling:

- Shall use five years of processed meteorology
- Shall generate 24-hour maximum and annual air impacts

- Shall separately address air emissions from (1) Cells 1 through 6A, (2) the entire affected area of the landfill, and (3) the emissions from the flares
- May use a surrogate emission unit rate for the area source and flares to determine the point or points of maximum impact.

A modeling protocol is to be developed and presented to Ohio EPA Division of Air Pollution Control (DAPC) for review and approval prior to the initiation of modeling.

Modeling results shall be presented to Ohio EPA, DAPC, on or before April 30, 2007. After review of those results, Ohio EPA may require that the initial third, northeast monitoring site remain, be relocated, or be supplemented with additional sampling sites in any area or direction. In selecting sites, Ohio EPA may also consider physical, legal, or other barriers that may make a specific location infeasible as a sampling site. If potential maximum concentration scenarios occur under meteorological conditions that can not be replicated by the air quality model (i.e., calm wind conditions such as could occur during night time inversions), an additional site may also be required to address this condition. Sampling at sites relocated or added after the modeling shall begin within 30 days after Ohio EPA approves the site selection(s) in writing.

All sampling sites shall be secure (fenced, or on a roof top, etc.), and have a reliable source of power.

Countywide shall submit reports of results as specified in Section V, Paragraph 5A of the Director's Final Findings and Orders. However, Countywide need only report on a quarterly basis, by the 15th of the month following third month of sampling, the acute and chronic risk to human health for all constituents above the detection limit of each analytical test method.

Technical questions on these matters can be directed to Patty Porter of Ohio EPA at (614)644-3695.

Feel free to contact me with questions.

Sincerely,



Bryan Zima
Supervising Attorney
Air Programs