



## Countywide Recycling & Disposal Facility

Division of Republic Waste Services of Ohio  
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June 22, 2007

Ohio Environmental Protection Agency, Central Office  
Division of Solid and Infectious Waste Management  
PO Box 1049  
Columbus, Ohio 43216-1049

Attn: Mr. Ed Gortner

RE: INTERIM ACTION AND EVALUATION PLAN, ORDER 5.C  
ADDITIONAL REQUESTED INFORMATION ON SELECTED ACTIONS  
DIRECTOR'S FINAL FINDINGS AND ORDERS OF MARCH 28, 2007  
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

Countywide Recycling and Disposal Facility (Countywide) is in receipt of the Directors June 13, 2007 letter that selects Interim Action in accordance with Order No. 5.C.4 of the Findings and Orders (Orders) dated March 28, 2007. In addition, the Directors June 13, 2007 letter requests additional information. This letter transmits the requested additional information and updates our status of the Interim Actions.

Countywide has completed several actions while the Director was reviewing the Interim action plan and we are happy to report much as been completed. Refer to Table 1 for a summary of each selected action.

For interim action #2 – pumps in LFG wells, Countywide has selected the wells identified in Table 1 for initial pump installation. This selection considered existing liquid levels in the LFG wells, gas chemistry, and odors in the area. In the future, additional LFG wells may be added to the list for pump installation. These future evaluations will consider the same criteria.

For interim action #3 – installation of gas wells in Cell 7. This task was completed with the installation of seven new gas wells in late May and early June 2007.

For interim action #4 – Several modifications have already been made and these are described on Table 1. We also propose to move Flare 6 to consolidate and optimize collection efficiency from within the reaction area.

For interim action #6 – LFG wells to be replaced, Countywide has completed replacement of the wells indicated in Table 1. This selection was made based on gas chemistry exiting the well, recent depth to bottom of casing measurement, down hole camera video, and odor in the area. In the future, additional LFG wells may be added to the list for pump installation. These future evaluations will consider the same criteria.

For interim action #7 – Inspect and repair intermediate cover, Countywide has been inspecting the intermediate cover monthly as required by Order # 5.C (2) and repairing the intermediate cover (if necessary) within seven days, weather dependent, after damage is found.

For interim action #8 – We continue an aggressive program of system maintenance, and will report those actions to you on a monthly basis.

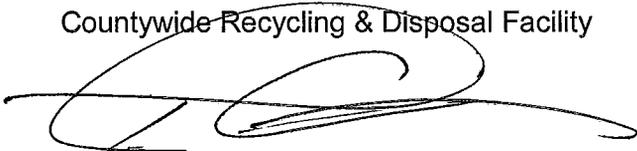
For interim action #9 – We will be conducting a smoke tracer study to determine if the odor neutralizing system needs to be reconfigured. We also propose other testing to determine the most effective neutralizing agent, and to determine if the system is effective.

For interim action #10- Temporary Synthetic Cover (TSC), Countywide has evaluated whether the TSC should be expanded to cover more than 30 acres. At this time, we believe the coverage of the TSC is adequate, however should new LFG well PW-170, recently installed as a part of interim action item #6, not significantly reduce odors near the cell 4/7 interface within 60 days of becoming operational, Countywide may decide to install more TSC in this area.

As a demonstration of the effectiveness of the interim actions and our continued aggressive maintenance program, please see the attached graph summarizing odor monitoring. The last weeks shown on this graph were impacted by drilling activities (which were done to fulfill actions identified in the Interim Action Plan).

Countywide considers this submittal as our response to your request for additional information. Countywide has begun to implement the Interim action Plan and will update you monthly with our progress. If you have questions, please do not hesitate to contact me at (330) 874-3855.

Countywide Recycling & Disposal Facility



Tim Vandersall, P.E.  
General Manager

cc/ec: Bill Skowronski, OEPA-NEDO  
Kirk Norris, SCHD  
Dan Aleman, CHD  
ec: Gina Gerbasi, OEPA-CO  
Jeff Martin, OEPA-CO  
Josh Adams, OEPA-NEDO  
Judy Bowman, OEPA-NEDO  
Todd Hamilton, CWRDF  
Jason Perdion, B&H  
Jim Walsh, SCS Engineers  
Mike Michels, Cornerstone  
Mike Beaudoin, Earth Tech

cc = printed copy  
ec = email pdf copy

**Table 1**  
**Countywide RDF - Director-Selected Interim Actions**

6/20/07 update

Measure #	Director-Selected Measure	Director's Comments on Selected Measure	Action Completed Prior to Director's Selection	Future Actions Proposed	Proposed Approximate Schedule
2	Installation of condensate pumps in more LFG wells	By 6/27/07 identify all wells where pumps will be installed and describe a plan for identifying future wells in which Countywide will install or relocate pumps.	Measured liquid levels in all LFG wells. Designed air compressor system and received bids for supply of the air compressor. Began planning for the 2' dia. airlines. Installed QED test pump to determine if it will operate better with warm leachate .	Add pumps to wells 14R3, 43R2, 56R2, 57R, 105, 108, 121R, 123, B2R, C1R. Monitor gas flow in all wells; when reduced flow is observed, take water level to determine if significant screen is obscured by water. If so, consider additional pump installations.	By August 12, 2007 order materials and get them delivered to CWRDF; By October 11, 2007 get airlines, and pumps installed and operational.
3	Installation of additional LFG wells in cell 7	None	Installed 7 new LFG wells in Cell #7; Wells 324 324, 325, 326, 328, 329, 330, and 331 and made them operational.	No further work proposed (see action completed left of this column). However, Countywide will continue to assess need for more wells in Cell 7 and add wells as necessary.	Completed. Ongoing assessment is implemented.
4	Enhancement of the existing LFG header system	None	Looped the dead end 8 inch diameter LFG header at LFG well PW-302. Repaired the 12 inch diagonal LFG header located on the south slope. Made the dripleg located on the east slope of cell 7 longer so it can process 60 inches water column vacuum. Repaired the sag in the lateral to W311. Installed 2 new knockout pots near the inlet to Flare #4 and Flare #6.	Move Flare #6 and supplement header system to support relocated flare and to optimize gas collection.	By August 12, 2007 to order materials and get them delivered to CWRDF; By October 11, 2007 to get the flare moved and new headers installed and made operational
6	Replace compromised existing LFG wells	By 6/27/07 identify all wells that will be repaired or replaced and describe a plan for identifying future wells in which Countywide will repair or replace.	Replaced 15 LFG wells; Wells W12R, W13R, PW-14R(3), W42R, W56R(3), W57R(2), W58R, PW-103R, PW-106R, B2R, C1R, C2R, D2R, E2R, and W1R. One new well (PW-170) installed to control odors on north slope of the 88 acre area. See Table 2 for details.	No further work proposed (see action completed left of this column). However, Countywide will continue to assess condition of wells and replace compromised wells as necessary.	Completed. Ongoing assessment is implemented.
7	Maintain the intermediate cover soil	When will the areas of intermediate cover that need to be repaired be identified? Describe how soon repairs will be made after damage is identified.	Countywide implemented an inspection program for the intermediate cover monthly for eroision or other items that may need repair. Repairs made within seven days of discovery, weather permitting.	Continue monthly inspections and identification of areas that need to be repaired. If repairs to the intermediate cover are needed, repairs will be made within seven days, weather permitting.	Monthly inspection and reporting program is implemented.
8	Maintain LFG, cover, and other systems	None	Ongoing activites occur daily to prevent malfunctions and abate malfunctions when and if they occur	Ongoing monthly assessment.	Monthly assessment and reporting program is implemented.
9	Evaluate the Odor Neutralizing System	None	Consulted with several odor neutralizing vendors and experts.	Countywide to conduct smoke tracer study to determine optimum location of neutralizing system. Also, Countywide will shut down the system to determine its effectiveness.	Begin the evaluation by June 27, 2007. Complete the evaluation by July 28, 2007 and submit report to OEPA by August 5, 2007.
10	Modifications to the existing synthetic cap	Evaluate whether the TSC should be expanded to cover more than 30 acres.	Continued maintenance of the cap system. Designed alternate cap repair details that may accomodate settlement better. Investigated potential to use lightweight materials to fill cracks that occur under the cap. Evaluated odor from reaction area and determined that no additional cap needed at this time.	None at this time. Will continue to evaluate.	Weekly inspections and as-needed modifications are implemented.

\*Monthly reports will be submitted to summarize progress by the 10th of the month for the previous month

**Total Nasal Ranger Readings 4 and Greater**  
 (Total of 26864 Readings)

