



State of Ohio Environmental Protection Agency

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September 14, 2007

CERTIFIED MAIL

Tim Vandersall
General Manager/Engineer
3619 Gracemont St. S.W.
East Sparta, Ohio 44626

RE: Countywide Recycling and Disposal Facility (Countywide), 3619 Gracemont St. S.W., East Sparta, Ohio 44626, Stark County Incident Emergency Response Plan and Emergency Action Plan

Dear Mr. Vandersall:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed Countywide's revised Incident Emergency Response Plan (IERP) and Emergency Action Plan (EAP), submitted in response to comments provided by Ohio EPA on July 3, 2007. Ohio EPA has the following additional comments on these two documents:

General Comments:

- GC 1. The EAP has more detail regarding emergency situations and site evacuation. However, the details seem to be limited to response actions within office and maintenance buildings. There are no details about how to respond if an emergency occurs at the working face or some other part of the landfill itself, such as how/where to move people (staff, consultants, visitors, etc.) to a safe location; equipment shutdown/movement; rescue efforts, if necessary; etc.
- GC 2: The EAP and the IERP have duplicative information in many sections. The Ohio EPA recognizes that the IERP was submitted specifically in response to Order No. 11 of Director's Final Findings and Orders dated March 28, 2007. However, for ease in understanding and implementation, combining the EAP and IERP into one comprehensive document may be helpful.

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

Countywide Recycling and Disposal Facility
Preliminary Comments on Incident Emergency Response Plan
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Should you have any questions, please contact me at 614-728-5325, or contact Jeff Martin at 614-728-5360 or Gina Gerbasi at 614-728-5325.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ed Gortner'.

Ed Gortner
Enforcement Coordinator, Ohio EPA
Division of Solid and Infectious Waste Management

EG/SG/sw

cc: DSIWM Civil Enforcement Files, CO
Jeff Hurdley, Legal
Jeff Martin, DSIWM-CO
Gina Gerbasi, DSIWM-CO
Josh Adams, DSIWM-NEDO
Todd Hamilton, CWRDF
Michael Beaudoin, Earthtech