Countywide Recycling & Disposal Facility
Division of Republic Waste Services of Ohio
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April 10, 2007

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: SUBMITTAL OF INTERIM ACTION AND EVALUATION PLAN , ORDER 5.C.4 (a&b)
DIRECTOR'S FINAL FINDINGS AND ORDERS OF MARCH 28, 2007
COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

Countywide Recycling and Disposal Facility (Countywide) hereby submits the Interim Action and Evaluation Plan in accordance with Order No. 5.C.4 (a & b) of the Findings and Orders (Orders) dated March 28, 2007. This Plan was prepared by our consultant, Cornerstone Environmental Group, LLC.

Countywide considers this submittal as our compliance with Order No. 5.C.4 (a & b) and we await your review and direction prior to implementing this Plan. Please note that in the meantime, we will to continue to improve odor control and reduce gas emissions. If you have questions, please do not hesitate to contact me at (330) 874-3855.

Please call me if you have any questions.

Tim Vandersall, P.E.
General Manager

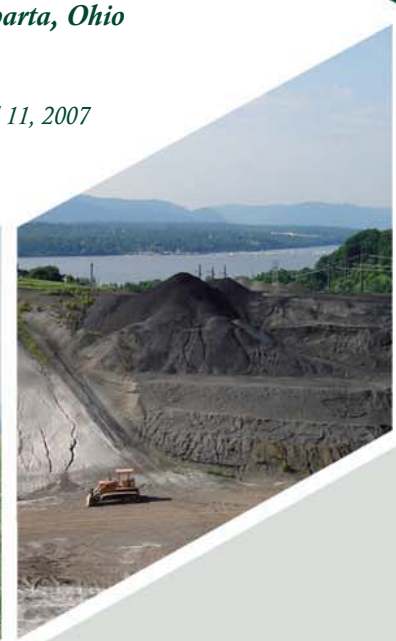
cc: Bill Skowronski, OEPA-NEDO
Kirk Norris, SCHD
Dan Aleman, CHD
Todd Hamilton, CWRDF
Jason Perdion, B&H
Mike Michels, Cornerstone

Interim Action and Evaluation Plan

PREPARED FOR:

Countywide Recycling & Disposal Facility
East Sparta, Ohio

April 11, 2007



CORNERSTONE
Environmental Group, LLC

607 Eastern Avenue, Plymouth, Wisconsin 53073

"Think Cornerstone for building and maintaining your solid waste business on a strong foundation."

COUNTYWIDE - INTERIM ACTION AND EVALUATION PLAN
TABLE OF CONTENTS

1 INTRODUCTION AND BACKGROUND

1.1 Introduction

Countywide Recycling and Disposal Facility (Countywide) is a Subtitle D municipal solid waste landfill located in Stark County, Ohio, that is owned and operated by Republic Services of Ohio II, LLC. Countywide is permitted and licensed to accept solid waste as it is defined in Ohio Revised Code. Countywide has been in operation since 1991.

Historically, Countywide's landfill gas (LFG) collection system operated as expected. Prior to late December 2005, the LFG well data was within expected ranges for landfill decomposition and landfill gas production. Beginning in December 2005, Countywide identified LFG wells with higher than expected temperatures while increased odors were being attributed to the landfill.

Countywide implemented extensive measures in an effort to respond to the odor issues. Since late December 2005, consultants, contactors, and experts have designed, installed, and operated an expansion of the LFG collection/control system and many other systems; all aimed at reducing odors and reducing LFG emissions.

1.2 Background

In light of odors attributed to Countywide, on September 6, 2006 the OEPA issued Directors Findings and Orders. By December 15, 2006 Countywide had complied with all Orders. On March 28, 2007 the OEPA and Countywide entered into Directors Final Findings and Orders (F&O's). This report is prepared to fulfill the requirement of Order 5.C.4 (a & b) of the March 28, 2007 F&O's. This order states:

"Not later than 14 days after the effective date of these Orders, submit to Ohio EPA for review and comment an Interim Action and Evaluation Plan ("IAEP") which shall:
a) provide a detailed evaluation, in terms of technical feasibility, overall effectiveness, and cost, of all the measures that could be potentially be implemented to further prevent nuisance odors and uncontrolled LFG emissions from being released from Respondent's Facility prior to the implementation of the comprehensive remedial action required by these Orders to extinguish the fire at the Facility. The

evaluation shall address, but not be limited to, the following measures: installation of additional wells and expansion of the gas collection system.

b) For each of the technically feasible measures identified pursuant to a) above, propose a schedule for the expeditious implementation of the measure.

Ohio EPA may review the IAEP in accordance with the procedures set forth in Section VI Review of Submittals. After completion of the IAEP, the Director may select an interim action that is designed to further prevent nuisance odors and uncontrolled LFG emissions from being released from Respondent's Facility prior to the implementation of the comprehensive remedial action required by these Orders to extinguish the fire at the Facility. Respondent shall implement the selected interim action in accordance with the terms and conditions of the Director's final action selecting the interim remedial action."

2 EVALUATION OF ODORS

2.1 Odor Monitoring and Control

A comprehensive odor monitoring program out in the community surrounding Countywide RDF was implemented by representatives of Republic Services in accordance with the September 6, 2006 Director's Findings and Orders. This program was an extension of the pre-existing odor control and contingency plan dated March 2004.

On September 19, 2006 Diversified Engineering Inc. ("DEI") representatives were trained in the use and documentation of the Nasal Ranger Olfactometer. This training took place at Slutz Park in Sandy Township, the training was provided by St. Croix Sensory Inc., the manufacturers of the Nasal Ranger.

On September 20, 2006 DEI began odor monitoring around Countywide. Beginning on September 20, 2006 and daily thereafter, a DEI odor surveyor monitored odors twice daily at 20 fixed monitoring points surrounding the facility. This monitoring loop is completed approximately eight times a day from 6 am to midnight weekdays and 2-4 times a day on weekends. The monitoring consisted of personal observations along with the objective measurement of odors that were detected using a Nasal Ranger Olfactometer.

For purpose of odor surveying, the "facility boundary" was defined as public roads that surround the landfill. Odor monitoring was conducted at fixed monitoring points on the surrounding roads. DEI returned to the exact locations for monitoring each day.

If an odor was detected during an odor survey, DEI personnel would measure the odor by using the Nasal Ranger and record the results. Upon discovery of detectable odor, DEI odor surveyors would investigate possible sources of the odor.

If the source of an odor was determined to be the landfill the odor monitor would report the odor to the Landfill Operations Manager, Landfill Engineer, or the Landfill Manager to determine possible causes of the odor. These potential causes of odor were recorded. In the event of an odor complaint, the odor monitor would go to the site of the complaint and follow similar procedures.

At the start of odor surveying and complaint investigations, odors were more intense and more frequent. At times the odors measured a 7 or greater on the Nasal Ranger, during September, October, November and early December of 2006. This is not unexpected considering that much of the landfill work that was being conducted during that time period was intrusive and required certain acres of landfill to be "opened up" during construction.

Once 30 acres of HDPE cap and approximately 180 gas collectors were installed, measurable odors were reduced dramatically in frequency, intensity and duration. Figure 2-1 shows the decline in the number of investigated complaints with a Nasal Ranger reading of 4 or greater.

Countywide RDF
Figure 2-1 – Nasal Ranger Readings

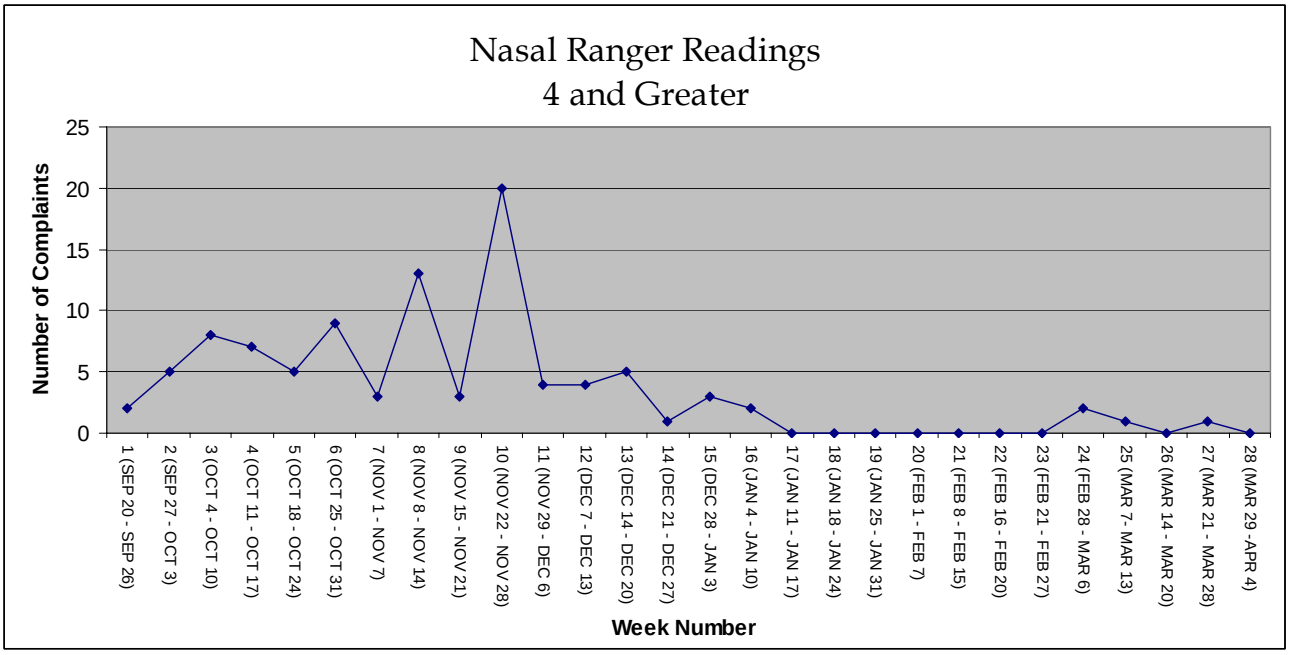


Table 2-1 compares the percentage of readings from the first week that we began odor monitoring to the 28th week of odor monitoring. The data confirms significant improvement with respect to odors in the vicinity of Countywide in the past 28 weeks. We now receive only a few complaints per week, the majority of these complaints come from just a handful of repeat complainants, some who are known to be driving around and searching for an odor. Since the beginning of this program, DEI has logged over 16,000 odor data points through March 2007.

Countywide RDF
Table 2-1 – Comparison of Historic Nasal Ranger Readings

	WEEK 1	Week 28
READINGS	**PERCENTAGE OF READINGS**	**PERCENTAGE OF ODORS**
ND	82.5%	93.14%
<2	7.5%	6.74%
2	1.25%	0.12%
4	6.25%	0%
7	0%	0%
15	0%	0%
30	2.5%	0%
60	0%	0%
TOTAL	100%	100%

All information that is provided in this section may be found in the binders located at Countywide.

A comprehensive Odor Control and Contingency Plan was developed by Countywide in 2004, and was successfully implemented and applied through 2006. In 2006, Cornerstone Environmental Group, LLC updated that Plan, and that Plan was submitted to Ohio EPA and Stark County Health Department on February 13, 2007. The updated Plan was prepared to reflect the dynamic nature of the GCCS and the distinct odor resulting from the reaction. This updated plan also included measures to proactively manage both the 30 acre geomembrane cap and the recently enhanced gas collection system.

Most of the aspects of the odor control plan have already been implemented including conduct of the community monitoring program, odor mitigative steps at Countywide, and contingency actions applied as necessary. Pending receipt of comments from Ohio EPA, the Odor Control and Contingency Plan will be revised and finalized, with any additional recommendations implemented as needed, under the new F&O's.

2.2 Examination of Odors During March 2007

To gain insight into the cause of odors, the 38 complaints received between March 1st and March 23rd of 2007 were reviewed. This time period was selected because it represents the most recent operation and is during a time when heavy maintenance of the LFG system was occurring and geomembrane cover systems repairs were underway. The complaint investigations include efforts to track the source of any odor in an attempt to pinpoint the cause of odor. Table 2-2 summarizes the source of odors during this period.

Countywide RDF
Table 2-2 – Summary of Odor Sources from 38 Complaints During March 2007

Odor Sources	Complaints (%) [1]
Remedial Work Efforts	40 %
Unverified or Undetermined [2]	31.5%
Odor Neutralizing System	17%
Normal LFG or Working Face	11.5%

This data indicates that heavier than normal remedial activities (i.e. intrusive landfill gas and leachate system sealing and repairs, and temporary cap repairs) represent the majority of the odors verified during this period. These work activities, albeit necessary are creating the opportunity for the release of the odors. As required by the March 28, 2007 Director's Final Findings and Orders, we anticipate that remedial work activities will continue but will be greatly reduced over time. Accordingly some odors may still be caused from these activities going forward, but Countywide and its contractors will minimize the odors to the extent possible during the work so that long-term benefits can be achieved.

For 31.5 % of the odor complaints, the sources could not be verified or identified during the complaint investigation. Some of these complaints may have been simply filling the ballot box to get the count increased or may have been an instance where the odors were emanating from other nearby industries or activities not associated with Countywide. Further, a significant number of complaints are received the day after the odor is actually detected by the complainant; therefore, complaint investigation, verification, or identification is not possible.

For 17% of the odor complaints, the source was identified as the fragrance from the odor neutralizing system. This system is operated by Countywide to neutralize or mask landfill odor. However it appears that the odor from this mist is causing some complaints. The odor neutralizing products used at Countywide have been researched to be pleasing and have been successfully used in many applications around the USA. It appears that the highly sensitized nature of the Countywide odor issue causes complaints to be made even when not directly related to landfill odors. Nevertheless, Countywide takes every odor complaint very seriously and Section 3 of this report recommends several potential measures that can be taken to reduce complaints attributed to the neutralizing system.

11.5% of the odor complaints were traced to traditional landfill related sources (i.e. the working face and normal landfill gas). Section 3 of this report recommends several potential measures that can be taken to reduce these odors. These recommendations are intended to reduce odors and should reduce the LFG / working face odor sources going forward.

[1] As noted in Section 2.1 the measured odor intensity associated with reported complaints were much lower in March 2007 than during 2006.
[2] Unverified or undetermined indicates that the sources odors were not be confirmed upon arrival or could not be identified during follow-up at the landfill.

3 ACTION PLAN

3.1 Evaluation of Potential Measures

This section evaluates potential measures that could further reduce odors and uncontrolled emissions. As noted in Section 1 of this report, Countywide has expanded its LFG collection system, added a temporary synthetic cap, enhanced the intermediate cover, and sealed numerous cap penetrations to prevent odors and uncontrolled emissions. As such, a wide range of activities that are normally employed to reduce odor and uncontrolled emission have already been implemented at Countywide.

This evaluation is focused on measures that can be implemented in the short term, prior to the remedial action to suppress the heat found in portions of Countywide. For the most part, these actions represent intensification of the operation and maintenance of the existing systems. Details of each measure are presented in subsequent subsections of this report**.**

3.1.1 Installation of Additional LFG Wells in the 88 Acre Area

Currently 155 LFG wells plus 28 other collectors are in-place to collect LFG at Countywide. 171 LFG collectors are located in the original 88 acre area or approximately one LFG collector per half acre. Considering that the original 88 acres has nearly twice as many LFG collectors than a typical LFG system, we do not see the benefit to adding more LFG wells in the area. In fact, adding more LFG wells can lead to overlapping zone of influence which creates many challenges for the field technician when trying to fine tune the system. Adding more wells can be counterproductive by reducing LFG system effectiveness and increasing air infiltration.

3.1.2 Installation of Condensate Pumps in More LFG Wells

At any one time, between 15 and 30 LFG wells at Countywide have condensate pumps installed in them. It has been determined that removal of condensate from LFG wells where more than 50 percent of the screen is covered with condensate can be beneficial in capturing more LFG. A review of available well screen data in LFG wells is ongoing and we have determined that it may be beneficial to add or relocate condensate pumps at various locations. We anticipate this will be an ongoing process, dependant on the results of frequent operational adjustments. The installation and/or relocation of condensate pumps in LFG wells is both technically feasible and can improve the effectiveness of reducing odors.

3.1.3 Installation of Additional LFG Wells in Cell 7

According to the New Source Performance Standards (NSPS) for Landfills, Countywide is not required to have an operating LFG collection system in Cell 7 until February, 2010 or when it reaches final grade. However, as part of its aggressive efforts to reduce odors, 12 LFG wells were installed along lower levels of the intermediate cover sideslope in Cell 7. These LFG wells and LFG headers were installed during the fall / winter of 2006. Waste placement in cell 7 continued after installation of the original 12 LFG well system and as such, installation of additional LFG wells could occur in these areas.

Design of the LFG system in Cell 7 and all of Countywide was previously prepared and submitted to CCHD and OEPA on December 15, 2006. This submittal, also known as the Gas Collection and Control System (GCCS) Design Plan, has not yet been approved by the regulatory agencies.

The installation of additional LFG wells in Cell 7 is both technically feasible and may improve the effectiveness of reducing odors and uncontrolled emissions. We request regulatory approval of the GCCS Design Plan prior to expanding LFG collection further into Cell 7.

3.1.4 Enhancement of the Existing LFG Header System

Based on months of operational data and the installation of redundant LFG header loops with oversized pipe diameters, we have determined that most of the existing headers are functioning better than designed and working very well to distribute vacuum to the system. As such full scale changes to the headers will not be effective. However, enhancements would slightly increase the effectiveness of odor control. The recommended minor enhancements are as follows:

1. Loop the dead end 8 inch diameter LFG header at LFG well PW-302. This additional header will help to better distribute vacuum to the northwest corner of Cell 7,

2. Repair the 12 inch diagonal LFG header located on the south slope. A sag has occurred in the header.

3. Make the dripleg located on the east slope of cell 7 longer so it can process 60 inches water column vacuum. In addition, once the fix is made, the drip leg should be covered with a minimum of 3 feet of soil to prevent freezing in the winter.

4. Repair the sag in the lateral to W311.

5. Repair the sag in the 16 inch diameter header located between Well W-1 and W-2. The exact location of this sag is unknown and may require insertion of a camera to define repair needs.

6. Install 2 new knockout pots near the inlet to Flare #4 and Flare #6.

Enhancing the existing header system, as stated above, is both technically feasible and can slightly improve the effectiveness of reducing odors and uncontrolled emissions.

3.1.5 Addition of More Blower / Flare Capacity

Currently CWRDF has 5 blower flare skids in operation and 2 additional blower flare skids connected to the system in stand-by mode (in case they are needed). Operational data shows that the existing 5 blower flare stations are not operating at capacity because not enough LFG is being generated to utilize the available capacity. Table 3-1 summarizes the existing on-site blower and flare capacity.

Countywide RDF
Table 3-1 – Existing Blower and Flare Capacity

Flare #	Equipment Capacity (scfm)	Actual LFG Flow Rate on March 29, 2007 (scfm)	Current Status of Flare
1	3000	1730	Operational
2	2100	0	Stand-by
4	3000	953	Operational
5	1350	930	Operational
6	2100	942	Operational
7	3000	1618	Operational
8	3000	0	Stand-by
Total	17,550 *	6173	

* Note: there is no need or intention to utilize this total capacity. Countywide must maintain compliance with Directors Order 6 which limits actual LFG processed. This total is only shown to demonstrate that the addition of more blower/flare capacity is clearly not required.

Based on the data presented in Table 3-1, approx. 3 times excess capacity exists in the existing blower / flare stations. Even with additional LFG flow that will be collected once the proposed measures are implemented, we believe that the existing blower / flare capacity is more than enough to process the LFG from Countywide.

The addition of more blower and flare capacity is technically feasible but will not improve the effectiveness of reducing odors and uncontrolled emissions. In accordance with the Directors Order 4C, Countywide is planning the installation of diesel powered backup generators at blower / flare stations that have utility power.

3.1.6 Replace Compromised Existing LFG Wells

As stated in subsection 3.1.1 a significant number of LFG wells are present in the original 88 acres. Some of the existing LFG wells have been damaged or are nearing the end of their useful life. For example: LFG well X1 has significant amounts of liquid in the well casing but the casing is not large enough to facilitate pump installation. Replacement or repair of LFG wells that present operational challenges may enhance overall system performance. If other LFG wells are periodically found in a compromised state they will be added to the list and repaired or replaced as appropriate.

Replacing compromised LFG wells, is both technically feasible and can slightly increase the effectiveness of reducing odors and uncontrolled emissions.

3.1.7 Maintain the Intermediate Cover Soil

Intermediate cover over the waste serves important functions relative to reducing uncontrolled emissions, such as: reducing surface water infiltration, reducing air intrusion when vacuum is applied to the LFG system, and reducing odors. The intermediate cover soil at Countywide RDF consists of a minimum 12 inch thickness of soil. This section we consider the benefits, if any, of improvement to the intermediate cover soil.

Periodically, stormwater erodes the intermediate cover soil at Countywide during which time odors are sometimes noticed by the operator. Recent surface emissions monitoring conducted during the 4th Quarter of 2006 and the 1st Quarter of 2007 indicate that methane emissions from the site are in compliance with their permit. Surface emission monitoring at Countywide, and at all landfills required to conduct this monitoring, tests for methane and does not test for all types of gases. As such, the lack of excessive methane emissions is not conclusive evidence that odors or emission are not occurring.

Considering that erosion of the intermediate cover does periodically occur, and that odors near these areas are sometimes noticed, improving intermediate cover near erosion rills may slightly improve the effectiveness of reducing odors and uncontrolled emissions. As apart of Director's Order 4.A.1, Countywide will implement an inspection program to identify and then repair damaged sections of the intermediate cover.

3.1.8 Maintain LFG, Cover, and Other Systems

Maintenance of all systems used to control odors or reduce uncontrolled emissions from Countywide is very important. As required by Director's Order 5B, Countywide will follow the Malfunction Prevention and Abatement Plan as submitted to OEPA on February 13, 2007. Countywide is awaiting OEPA approval or comments on this document but in the meantime continues a program to maintain all systems.

3.1.9 Evaluate the Odor Neutralizing System

As presented in Section 2.2 the odor control product that is currently used in the neutralizing system has been identified in about 17% of the odor complaints. Perhaps the community is overly sensitized toward any odor. However we feel that modifications to the odor neutralizing system must be made to reduce complaints associated with it.

Three options exist to reduce complaints associated with the neutralizing system: 1) turn off and not operate the neutralizing system, 2) change the chemical to a different product, or 3) change the application rate or reduce the amount of fragrance in the product. Sometimes changing the fragrance in the neutralizing system only creates a new odor sensitivity and complaints sometimes continue.

We recommend that an evaluation of the neutralizing system be conducted. This evaluation will include time periods where the system is turned down, turned off, and/or

provided with different formulations. Odor monitoring and complaints will be tracked to asses the effectiveness of the evaluations.

3.1.10 Modifications to the Existing Synthetic Cap

As presented earlier in this report, 30 acres of temporary synthetic cap (TSC) is installed over portions of the 88 acre area. This TSC is manufactured from high density polyethylene (HDPE). Due to waste settlement, periodically the TSC experiences stress and rips or tears open, sometimes releasing odors. Countywide will conduct an evaluation of this TSC to determine if modifications to it would reduce these rips and tears. The evaluation should consider, at a minimum:

- Use of other material, such as hypalon, VLDPE, PVC instead of HDPE;
- Alternate methods to join the sheets of material together that would accommodate settlement better, such as shingling or taping instead of heat fusion; and
- Use of folding or overlapping the sheets so that more settlement can be tolerated.

In addition, a once per week inspection program will be initiated that will identify areas of the TSC that are being stressed so that preventative maintenance, such as installing extra sheets of material over the stress, can occur prior to a rip or tear.

3.1.11 Summary of Potential Additional Measures Considered

Table 3-2 summarizes the measures considered in this report.

Countywide RDF
Table 3-2 – Summary of the Potential Additional Measures Considered

Evaluation #	Measures that Could Be Implemented to Further Prevent Nuisance Odors and Uncontrolled Emissions	Overall Effectiveness? (None, Slight, Good)	Technically Feasible? (Yes / No)	Approx. Capital Costs[3]
1	Installation of additional LFG wells in the 88 acre area	None [4]	Yes	N/A, because it will not be effective
2	Installation of condensate pumps in more LFG wells	Good	Yes	$12,000 per well
3	Installation of additional LFG wells in cell 7	Good	Yes	$8,000 per well plus $2,000 per lateral from the well to the existing header
4	Enhancement of the existing LFG header system	Slight	Yes	Average cost will be approx $40 per foot of new header installed
5	Addition of more blower / flare capacity	None	Yes	N/A, because it will not be effective
6	Replace compromised existing LFG wells	Slight	Yes	$8,000 per well
7	Maintain the intermediate cover soil	Slight	Yes	$10,000 per acre to supplement and compact existing soils
8	Maintain LFG, cover, and other systems	Slight but included in Order 5B	Yes	N/A, because it is required in other Orders
9	Evaluate the odor neutralizing system	Good	Yes	$10,000 to $30,000
10	Modifications to the existing synthetic cap	Good	Yes	$1 per sq foot

[3] Capital costs to install the interim measure were obtained from typical costs in the Midwest USA; actual quotes from contractors have not been obtained for this Plan.
[4] We believe that installation of additional LFG wells in the 88 acre area will not be effective at this time, but Countywide will continue to evaluate this measure.

3.2 Recommended Measures to Be Taken

We understand that the OEPA will determine which of the 10 measures evaluated will be selected for implementation. Based on the evaluation in Section 3.1 of this report, Cornerstone recommends the measures shown in Table 3-3 be implemented at Countywide in order to provide increased odor and uncontrolled emission control. These measures are both technically feasible and have the highest likelihood of being effective. We have not let the costs of implementation sway our recommendations, but instead focused on the measures that are both technically feasible and have a slight or good likelihood of being effective.

Countywide RDF
Table 3-3 – Recommended Interim Actions
to Further Reduce Odors and Uncontrolled Emissions

Evaluation #	Recommended Interim Actions
2	Installation of condensate pumps in more LFG wells
3	Installation of additional LFG wells in cell 7
4	Enhancement of the existing LFG header system
6	Replace compromised existing LFG wells
7	Maintain the intermediate cover soil
8	Maintain LFG, cover, and other systems
9	Evaluate the Odor Neutralizing System
10	Modifications to the existing synthetic cap

The interim actions recommended in Table 3-3 should be initiated prior to the initiation of measures that may be identified in the future Fire Suppression Plan required by Director Order 8. We believe that the selection and implementation of measures beyond those outlined above is more likely to be effective after the initiation of the interim actions identified herein.

3.3 Proposed Schedule to Implement

The proposed schedules to implement the recommended interim actions are shown in Table 3-4. All dates are tied to start with the Directors written approval of this Plan and are shown in calendar days. During the Director's review of this Plan, Countywide will continue to work to reduce odors and control gas emissions, as necessary.

Countywide RDF
Table 3-4 – Schedule to Implement Interim Actions

Evaluation #	Recommended Interim Actions	Proposed Approximate Schedule	Approx Capital Costs [5]
2	Installation of condensate pumps in more LFG wells	60 days to order materials and get them delivered to CWRDF; 120 days to get airlines, and pumps installed and operational	$12,000 per well
3	Installation of additional LFG wells in cell 7	We assume OEPA will approve the GCCS Design Plan prior to the start of this schedule: 60 days after OEPA approval to order materials and get them delivered to CWRDF; 150 days to get the wells installed and new laterals run to the wells and made operational	$8,000 per well plus $2,000 per lateral from the well to the existing header
4	Enhancement of the existing LFG header system	60 days to order materials and get them delivered to CWRDF; 120 days to get the new headers installed and made operational	Average cost will be approx $40 per foot of new header installed
6	Replace compromised existing LFG wells	60 days to order materials and get them delivered to CWRDF; 120 days to get the replacement wells installed and made operational	$8,000 per well
7	Maintain the intermediate cover soil	As soon a practical after discovery of erosion rills	$10,000 per acre to supplement and compact existing soils
8	Maintain LFG, cover, and other systems	Ongoing as required in Order 5B	N/A, because it is required in other Orders
9	Evaluate the odor neutralizing system	Begin the evaluation within 14 days of OEPA approval. 45 days for evaluation and 15 days for reporting.	$10,000 to $30,000
10	Modifications to the existing synthetic cap	Once per week inspections and ongoing modifications.	$1 per sq foot

[5] Capital costs to install the interim measure were obtained from typical costs in the Midwest USA; actual quotes from contractors have not been obtained for this Plan.

LIMITATIONS

This report was prepared consistent with generally accepted professional consulting principles and practices. No other warranty, express or implied, is made. This report was prepared consistent with our agreement with our client. This report is solely for the use and information of our client unless otherwise noted. Any reliance on this report by a third party is at such party's sole risk.

Opinions and recommendations contained in this report apply to conditions existing when services were performed and are intended only for the client, purposes, locations, time frames, and project parameters indicated. We are not responsible for the impacts of any changes in environmental standards, practices, or regulations subsequent to performance of services. We do not warrant the accuracy of information supplied by others, nor the use of segregated portions of this report.