



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

OHIO E.P.A.

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

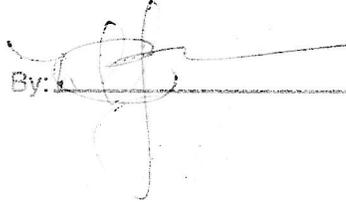
MAY 19 2010

ENTERED DIRECTOR'S JOURNAL

MAY 19 2010

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

Mr. Randy Traub  
County Environmental of Wyandot  
11164 County Highway 4  
Carey, Ohio 43316-9750

By:  Date: 5-19-2010

Re: County Environmental of Wyandot Landfill, Wyandot County  
Alternative Daily Cover Material Approval  
Combined Slag, Sand, and Sludge Material

Dear Mr. Traub:

On October 15, 2009, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received your written request for authorization to use a combined slag, sand, and sludge material as an alternative daily cover (ADC) material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3)(a) at the County Environmental of Wyandot Landfill solid waste disposal facility (Facility) in Wyandot County. Additional information was received on December 3, 2009, and April 13, 2010, consisting of a waste profile and additional sample results, respectively. The combined slag, sand, and sludge material is generated by Whemco Ohio Foundry (Whemco), located in Lima, Ohio, and was initially sampled on April 9, 2009. On December 8, 2009, representatives from Ohio EPA visited the Facility to look at a load of the combined slag, sand, and sludge material.

OAC Rule 3745-27-19(F)(3)(a) states, "The director may approve solid waste to be used as alternative material for daily cover if the owner or operator can demonstrate to the satisfaction of the director that the solid waste material proposed for use can provide protection comparable to six inches of soil and is protective of human health and the environment. The owner or operator must obtain written approval to use solid waste for alternative daily cover prior to utilizing the solid waste."

Ohio EPA has reviewed the information contained in the request and has determined that the combined slag, sand, and sludge material has the potential to function effectively as ADC material and provide protection comparable to six (6) inches of soil as required by OAC Rule 3745-27-19(F)(3)(a). Therefore, pursuant to OAC Rule 3745-27-19(F)(3)(a), I hereby authorize the owner or operator to use of the combined slag, sand, and sludge material from Whemco as ADC material at the Facility.

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

As part of this approval, the owner or operator is subject to the following conditions:

### CONDITIONS

1. This approval is limited to the use of only the combined slag, sand, and sludge material from Whemco Ohio Foundry, located in Lima, Ohio. The material must be of similar chemical composition, similar physical properties, and consistent with the waste characterization profile (#387Y913784) submitted to Ohio EPA on December 3, 2009.
2. This approval is limited to the use of only the combined slag, sand, and sludge material at the Facility. No other alternative daily cover material may be used at the Facility without prior authorization from Ohio EPA.
3. The owner or operator shall place the combined slag, sand, and sludge material over exposed waste materials by the end of the working day, or more frequently if necessary, to control fire hazards, blowing litter, odors, dust, insects, rodents, and other vectors. The combined slag, sand, and sludge material shall be placed no less than six inches thick. Prior to placing the next layer of waste, the combined slag, sand, and sludge material shall be removed or otherwise prepared as necessary so as not to impede the flow of leachate to the leachate management system.
4. If inclement weather conditions render the placement or use of the combined slag, sand, and sludge material ineffective or otherwise unsatisfactory, the owner or operator shall temporarily revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F) until such conditions cease to exist. Under such circumstances, the owner or operator may apply another ADC material that has been approved for use at the Facility, provided that the ADC material is able to perform effectively under the inclement conditions.
5. If the owner or operator determines that the combined slag, sand, and sludge material is ineffective or otherwise unsatisfactory under normal operating conditions, the owner or operator shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F). Under such circumstances, the owner or operator may apply another ADC material that has been approved for use at the Facility. The owner or operator shall verbally notify Ohio EPA, NWDO of this action by the end of the next working day and shall submit written notification to Ohio EPA, NWDO within 14 calendar days. This notification is not necessary if the use of the combined slag, sand, and sludge material ceases on a temporary basis in accordance with Condition Number 4, above.

6. If Ohio EPA determines that the use of the combined slag, sand, and sludge material is ineffective or unsatisfactory under normal operating conditions, then permission to use the ADC material may be revoked upon written notification from the Director of Ohio EPA (Director). Immediately upon such revocation, the owner or operator shall cease to use the combined slag, sand, and sludge material as ADC material at the Facility and shall revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F). Under such circumstances, the owner or operator may apply another alternative daily cover material that has been approved for use at the Facility.
7. All stockpiles or storage areas for the combined slag, sand, and sludge material shall be located within the current limits of solid waste placement. Any water that comes into contact with the combined slag, sand, and sludge material, either during use as ADC material or during storage, shall be directed into the leachate collection system.
8. The combined slag, sand, and sludge material shall not be used as intermediate or final cover. Any solid waste disposal area that remains inactive for a period of 14 days and that has been covered with the slag, sand, and sludge material shall be covered with at least six (6) inches of soil, in accordance with the submitted plan, by the end of the 14th day.
9. The combined slag, sand, and sludge material shall not be used as daily cover in areas where contact with the select waste layer is anticipated.
10. The use and location of the combined slag, sand, and sludge material shall be documented on the required Municipal Solid Waste Landfill Daily Log of Operations, Form 3 each day it is used as ADC material. This document shall also include a map that shows where and when the combined slag, sand, and sludge material was utilized as ADC material relative to the working face.
11. Appropriate state and local waste fees shall be applied to the combined slag, sand, and sludge material whether it is used as daily cover or is disposed at the working face.
12. The combined slag, sand, and sludge material shall be counted against the Facility's authorized maximum daily waste receipt of 4,500 tons.
13. The combined slag, sand, and sludge material shall be utilized only on internal slopes where surface water that may contact the combined slag, sand, and sludge material will be contained within the confines of the leachate collection system.
14. Nothing in this letter shall be construed to authorize any waiver from the requirements of any other applicable federal or state laws or regulations. This letter shall not be interpreted to release the owner or operator from responsibility under

Mr. Randy Traub  
County Environmental of Wyandot  
Page 4 of 4

Ohio Revised Code (ORC) Chapters 3704, 3714, 3734, or 6111; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants to the environment.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions regarding this authorization, please contact Jeremy Scoles of Ohio EPA, Northwest District Office at (419) 373-3079.

Sincerely,



Chris Korleski  
Director

pc: Jeremy Scoles, DSIWM, NWDO  
Chris Jaquet, Republic Services  
Jeff Richey, Wyandot County Health Department