

**STREET ADDRESS:**

**MAILING ADDRESS:**

Lazarus Government Center  
122 S. Front Street  
Columbus, Ohio 43215

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

Crawford County Board of Commissioners  
Crawford County Courthouse  
112 East Mansfield Street  
Bucyrus, Ohio 44820

Jack Stacy  
Santek Environmental  
5128 Lincoln Highway East  
Bucyrus, Ohio 44820

**Re: Crawford County Landfill, Crawford County  
Alternative Daily Cover Approval**

Dear Commissioners and Mr. Stacy:

On June 15, 2004, 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 an alternative daily cover (ADC) material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3) at the Crawford County Landfill (Facility) located in Crawford County. Specifically, the owner or operator requested to use Fabrene L257 tarp as ADC at the Facility.

OAC Rule 3745-27-19(F)(3)(b) states, "[t]he director may approve alternative materials, other than solid waste, and/or other thicknesses for daily cover if the owner or operator can demonstrate to the satisfaction of the director that the proposed alternative material and/or thickness provides protection that is comparable to six inches of soil and is protective of human health and the environment."

In your written correspondence, you requested permission to use Fabrene L257 as ADC material at the Facility. Fabrene L257 has been approved to be used as ADC material at other solid waste landfill facilities in Ohio. Based on the performance of the material at these other facilities, and after reviewing your request, Ohio EPA has determined that Fabrene L257 will function effectively as ADC material and provide protection comparable to six inches of soil as required by OAC Rule 3745-27-19(F)(3)(b). Therefore, pursuant to OAC Rule 3745-27-19(F)(3)(b), I hereby authorize the owner or operator to use Fabrene L257 as ADC material at the Facility.

Bob Taft, Governor  
Jennette Bradley, Lieutenant Governor  
Christopher Jones, Director



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

### **CONDITIONS**

1. This authorization is limited to the use of only Fabrene L257 at the Crawford County Landfill. No other alternative daily cover material may be used at the Facility without prior authorization from Ohio EPA.
2. The owner or operator shall place Fabrene L257 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, and rodents.
3. If inclement weather conditions will render the placement or use of Fabrene L257 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 it is able to perform effectively under the inclement conditions.
4. If the owner or operator determines that Fabrene L257 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 by Ohio EPA 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 fourteen (14) calendar days. This notification is not necessary if the use of Fabrene L257 ceases on a temporary basis in accordance with Condition Number 3, above.
5. If Ohio EPA determines that the use of Fabrene L257 is ineffective or otherwise unsatisfactory under normal operating conditions, then permission to use the material may be revoked upon written notification from the director of Ohio EPA. Immediately upon such revocation, the owner or operator shall cease to use Fabrene L257 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 ADC material that has been approved for use at the Facility.
6. The Crawford County Landfill shall not have more than 20,000 square feet of waste covered with ADC material at any one time. This maximum area applies to the use of Fabrene L257 alone or in combination with other ADC materials that have been authorized at the Facility.

7. Fabrene L257 shall not be used as intermediate or final cover. Any solid waste disposal area that remains inactive for a period of seven (7) days, and which has been covered with Fabrene L257, shall be covered with at least six (6) inches of soil in accordance with OAC Rule 3745-27-19(F) by the end of the seventh day. Prior to applying the soil cover, Fabrene L257 shall be removed or otherwise prepared as necessary so as not to impede the flow of leachate to the leachate management system.
8. The owner or operator shall promptly replace or repair Fabrene L257 if it becomes frayed, torn, ripped, or otherwise rendered unusable and is, therefore, no longer able to serve its intended purpose.
9. Any scrap tires used by the owner or operator to secure the ADC material must be managed in accordance with Ohio Revised Code (ORC) Chapter 3734 and the rules promulgated thereunder.
10. The use and location of Fabrene L257 shall be documented on the required Daily Log of Operations, Form 3 on each day it is used as ADC material. This documentation shall also include a map that shows where and when Fabrene L257 was utilized as alternative daily cover material relative to the working face.
11. 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 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 of Ohio EPA is final and may be appealed to the Environmental Review Appeals Commission (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. It must be filed with the Commission within thirty (30) days after notice of the director's action. A copy of the appeal must be served on the director within three (3) days of filing with the Commission. An appeal may be filed with the Commission at the following address:

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

Crawford County Board of Commissioners  
Mr. Jack Stacy  
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If you have any questions regarding this authorization, please contact Mary Ann Miller of Ohio EPA, NWDO at (419) 373-3060.

Sincerely,

Christopher Jones  
Director

CJ/MAM/MM/sw

cc: Ms. Jackie Ward, Crawford County Health Department  
Mr. Rob Burnette, Santek Environmental  
Scott Hester, DSIWM-CO  
Mary Ann Miller, DSIWM-NWDO