



Countywide Recycling & Disposal Facility
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OHIO EPA
 DIV. OF SOLID & INFECTIOUS WASTE MGMT.

July 17, 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: WRITTEN DEMONSTRATION FOR GAS WELLS WITH OXYGEN EXCEEDANCES
 INITIAL EXCEEDANCE PERIOD JULY 2-6, 2007
 ORDER 4.B.2, DIRECTOR'S FINAL FINDINGS AND ORDERS OF MARCH 28, 2007
 COUNTYWIDE RECYCLING AND DISPOSAL FACILITY

Dear Mr. Gortner:

Between July 2 and July 6, 2007, one (1) landfill gas (LFG) extraction well had an initial oxygen exceedance over 1.5% which was not able to be brought into the target oxygen range within 14 days. Therefore, Countywide hereby submits this written demonstration for landfill gas extraction well exceedances as required by Order 4.B.2, which states:

"If corrective measures undertaken by Respondent fail to lower the oxygen levels within the gas extraction well to 1.5% oxygen by volume, Respondent shall submit a written demonstration to Ohio EPA not later than 14 days after Respondent's initial discovery of the landfill gas extraction well exceedance which explains why a given landfill gas extraction well or wells cannot meet the 1.5% oxygen by volume target goal. The demonstration shall further document in detail all of the corrective measures undertaken by Respondent to achieve the 1.5% by volume level since the exceedance. Respondent's written demonstration may further request an alternative oxygen concentration."

The LFG well identified during this time period is noted in Table 1, below.

Table 1
LFG Wells with Greater than 1.5% Oxygen During the Week of July 2, 2007
For Which Written Demonstration is Required

As-Built Well ID	Date of Initial Exceedance	Initial Oxygen Content	Last Oxygen Content As Of July 17, 2007
PW-140	7/3/07	2.7%	2.7%

Corrective actions were taken as described in Table 2 below.

Table 2
Corrective Actions Taken for Oxygen Exceedances Monitored the Week of July 2, 2007
and Reason Mandated Oxygen Content Not Achieved

As-Built Well ID	Corrective Actions Taken	Reason 1.5% Level Not Achieved
PW-140	Nominal vacuum adjustments and assessed well integrity.	During the well integrity assessment of this well it was determined that excessive settlement has occurred at and around the vicinity of this well. No additional readings were taken at this well after July 3, 2007.

As stated above in Table 2 there has been settlement at and around this well due to the aluminum dross reaction. In addition this well is located within the temporary geomembrane cap and thus it is impossible to determine where cracks and voids are located. Countywide has deemed this area unsafe to access and will discontinue monitoring this well. This well will be disconnected from the header and capped at the header where it is safe to access. New vertical LFG wells will be drilled in this area once the reaction subsides and the surface stabilizes. It is unknown when this will occur. In the meantime LFG from this area will be captured under the temporary geomembrane cap and routed to surface collectors and other LFG collectors.

This correspondence serves as notice that PW-140 has is now considered abandoned, and will no longer be monitored.

Please feel free to call me should you have any questions or require additional information.

Sincerely,



Tim Vandersall, P.E.
 General Manager

cc: Bill Skowronski, OEPA-NEDO
 Kirk Norris, SCHD
 Dan Aleman, CHD
 Todd Hamilton, CWRDF
 Kyle Nay, Cornerstone
 Mike Michels, Cornerstone
 Mike Contestabile, Cornerstone
 Jason Perdion, B&H
 Jim Walsh, SCS Engineers