



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

OHIO E.P.A.

OCT 29 2012

REGISTERED DIRECTOR'S JOURNAL

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.

October 29, 2012

By John Lassiter Date: 10-29-12

Mr. Tim Vandersall
General Manager
Countywide Recycling and Disposal Facility (RDF)
3619 Gracemont Avenue S.W.
East Sparta, OH 44626

**RE: Countywide Recycling and Disposal Facility (RDF), Stark County
Alternative Daily Cover Material Approval
Thrace-LINQ GTF-500**

Dear Mr. Vandersall:

On September 12, 2012, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO) received a 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 Countywide RDF (Facility) located in Stark County.

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

Specifically, the owner or operator requested to use GTF-500 geotextile fabric manufactured by Thrace-LINQ. Each geotextile fabric panel measures 90 ft. X 150 ft. totaling 13,500 ft². The owner or operator may employ numerous panels on any given day depending on the size of the working face.

Ohio EPA has reviewed the information contained in the September 12, 2012, request and has determined that Thrace-LINQ GTF-500 geotextile fabric has the potential to provide protection comparable to six (6) inches of soil as required by OAC Rule 3745-27-19(F). Therefore, pursuant to OAC Rule 3745-27-19(F)(3)(b), I hereby authorize the

owner or operator of Countywide RDF to use Thrace-LINQ GTF-500 as an alternative daily cover material at the Facility, subject to the following conditions:

CONDITIONS

1. This authorization is limited to the use of Thrace-LINQ GTF-500 at the Facility. 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 Thrace-LINQ GTF-500 over exposed waste materials at the end of each working day, or more frequently if necessary, to control fire hazards, blowing litter, odors, dust, insects, birds, rodents, or other vectors. Prior to placement of the next layer of waste, Thrace-LINQ GTF-500 shall be removed or otherwise prepared as necessary so as not to impede the flow of leachate to the leachate management system.
3. Any scrap tires used by the owner or operator to secure Thrace-LINQ GTF-500 shall be managed in accordance with Ohio Revised Code (ORC) Chapter 3734 and the rules promulgated thereunder.
4. If inclement weather conditions will render the placement or use of Thrace-LINQ GTF-500 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.
5. If the owner or operator determines that Thrace-LINQ GTF-500 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 submit written notification to Ohio EPA NEDO and Stark County Health Department (SCHD) within fourteen (14) calendar days after the action has been taken. This notification is not necessary if the use of the Thrace-LINQ GTF-500 ceases on a temporary basis in accordance with Condition Number 4.
6. If Ohio EPA or SCHD determines that the use of Thrace-LINQ GTF-500 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 using Thrace-LINQ GTF-500 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.
7. The owner or operator shall not use Thrace-LINQ GTF-500 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 Thrace-LINQ GTF-500, 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.
 8. The owner or operator shall promptly replace or repair Thrace-LINQ GTF-500 if it becomes frayed, torn, ripped, or otherwise rendered unusable and is therefore no longer able to serve its intended purpose.
 9. The use and location of Thrace-LINQ GTF-500 shall be documented on the required Municipal Solid Waste Landfill Daily Log of Operations, Form 3 on each day it is used as ADC material.
 10. Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable federal or state laws or regulations. This letter shall not be interpreted to release the owner or operator from responsibility under 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.

END OF CONDITIONS

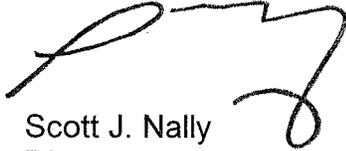
You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to ORC Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be 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 "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated 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
77 South High Street, 17th Floor
Columbus, Ohio 43215

Mr. Tim Vandersall
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If you have any questions regarding this letter, please contact Joshua Adams of Ohio EPA, NEDO at (330) 963-1103.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott J. Nally". The signature is stylized with a large initial "S" and a long horizontal stroke.

Scott J. Nally
Director

SHB.BM/sw

cc: Paul DePasquale, Stark County Health Department
Lynn Sowers, DMWM NEDO
Scott Hester, DMWM CO
Jeff Hurdley, Ohio EPA Legal
Nicholas Bryan, AGO