



State of Ohio Environmental Protection Agency

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DEC -9 2003 P.O. Box 1049
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DEC 09 2003

ENTERED RECIPIENT'S JOURNAL

William Hadley
Landfill Manager
Mt. Eaton Reclamation, Inc.
P. O. Box 256
Mt. Eaton, Ohio 44659

Wm J. Jackson 12-9-03

**Re: Mt. Eaton Landfill, Wayne County
Alternative Daily Cover Approval**

Dear Mr. Hadley:

On June 9, 2003, the Ohio Environmental Protection Agency (Ohio EPA) issued an approval to use any woven polypropylene geotextile that meets certain minimum material specifications as alternative daily cover (ADC) material at the Mt. Eaton Landfill for a 180-day trial period. The material specifications are as follows:

Property	Test Method	Value
Tensile strength (lbs)	ASTM D-4632	200
Elongation at break (%)	ASTM D-4632	15
Mullen burst (psi)	ASTM D-3786	450
Puncture (lbs)	ASTM D-4833	100
Trapezoidal tear (lbs)	ASTM D-4533	75
AOS, US std. sieve	ASTM D-4751	40
Permittivity (sec ⁻¹)	ASTM D-4491	0.07
UV resistance (%retained at 500 hrs)	ASTM D-4355	90

During the trial period, the performance of the ADC material used was monitored by Ohio EPA's Northeast District Office (NEDO) and the Wayne County Health Department to determine the material's effectiveness and its ability to function in the manner intended. Additionally, Norton Environmental submitted a report detailing the performance of the woven polypropylene geotextile as ADC material during the trial period.

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

Based on the results of Ohio EPA's and the Wayne County Health Department's monitoring and the information contained in the report, we have determined that the woven polypropylene geotextile functioned effectively as an ADC material and provided protection comparable to traditional soil cover.

As part of the June 9, 2003, approval, if the owner or operator finds that the ADC material performs as intended and wishes to continue its use on a permanent basis, it may submit a request to the director to do so. By document dated August 21, 2003, Norton Environmental submitted such a request.

OAC Rule 3745-27-19(F)(3) states that the director may approve alternative materials and/or thicknesses for daily cover if the owner or operator can demonstrate to the satisfaction of the director that the alternative material and/or thickness provides comparable protection and is protective of human health and the environment.

Because Ohio EPA and the Wayne County Health Department have determined that the material functioned effectively as ADC and provided protection comparable to traditional soil cover, pursuant to OAC Rule 3745-27-19(F)(3), I hereby authorize Norton Environmental to use the woven polypropylene geotextile as ADC material on an on-going basis at the Mt. Eaton Landfill. As part of this authorization, you are subject to the following conditions:

1. This authorization is limited to the use of only woven polypropylene geotextile that meets the above material specifications at the Mt. Eaton Landfill. No other ADC material may be used at the landfill without prior authorization from Ohio EPA.
2. The owner or operator shall place the woven polypropylene geotextile 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 render the placement or use of the woven polypropylene geotextile 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 landfill, provided that it is able to perform effectively under the inclement conditions.

4. If the owner or operator determines that the woven polypropylene geotextile is ineffective or otherwise unsatisfactory under normal operating conditions, Norton Environmental 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 landfill. The owner or operator shall verbally notify Ohio EPA, NEDO and the Wayne County Health Department of this action by the end of the next working day and shall submit written notification to Ohio EPA within 14 calendar days. This notification is not necessary if the use of the woven polypropylene geotextile ceases on a temporary basis in accordance with Condition 3 of this authorization.
5. If Ohio EPA or the Wayne County Health Department determines that the use of the woven polypropylene geotextile is ineffective or unsatisfactory under normal operating conditions, then permission to use the woven polypropylene geotextile may be revoked upon written notification from the Director of Environmental Protection. Immediately upon such revocation, the owner or operator shall cease to use the woven polypropylene geotextile 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 Mt. Eaton 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 the woven polypropylene geotextile by itself or in combination with other ADC materials that the director has authorized to be used at the facility.
7. The owner or operator shall promptly replace or repair the ADC material if it becomes frayed, torn, ripped, or otherwise rendered unusable and is, therefore, no longer able to serve its intended purpose.
8. The woven polypropylene geotextile shall not be used as intermediate or final cover. Any solid waste disposal area that remains inactive for a period of seven days and that has been covered with the woven polypropylene geotextile shall be covered with at least six inches of soil in accordance with OAC Rule 3745-27-19(F) by the end of the seventh day.
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 the woven polypropylene geotextile shall be documented on the Municipal Solid Waste Disposal Facility Daily Log of Operations, Form 3 on each day that it is used as ADC. This documentation shall also include a map that shows where and when the woven polypropylene geotextile was utilized as ADC relative to the working face.
11. The manufacturers and/or the product names of the woven polypropylene geotextiles and the length of time the material was used shall be documented by the facility. This documentation shall be submitted to the Ohio EPA, NEDO in the Annual Operational Report.
12. Upon switching to a woven polypropylene geotextile made by a different manufacturer or having a different product name, the facility shall notify Ohio EPA, NEDO and the Wayne County Health Department within 14 days. The new material must, at a minimum, meet the material specifications detailed in this authorization.

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 Environmental Protection 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. It must be filed with the commission within 30 days after notice of the director's action. A copy of the appeal must be served on the director within three 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

Mt. Eaton Landfill, Wayne County
Alternative Daily Cover Approval
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If you have any questions regarding this authorization, please contact Clarissa Gereby of Ohio EPA, NEDO at (330) 963-1224.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher Jones". The signature is written in a cursive style with a large initial "C".

Christopher Jones
Director

cc: Murat Tukul, DSIWM-NEDO
Scott Hester, DSIWM-CO
Ken Eng, Wayne County Health Department