



State of Ohio Environmental Protection Agency

**STREET ADDRESS:**

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**MAILING ADDRESS:**

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

Todd Hamilton  
Countywide RDF  
3619 Gracemont Street S.W.  
East Sparta, Ohio 44626

**Re: Countywide Recycling and Disposal Facility, Stark County  
Alternative Daily Cover Approval**

Dear Mr. Hamilton:

On January 28, 2004, the Ohio Environmental Protection Agency (Ohio EPA) received your request to permanently use Belton Industries, Inc.'s Style 884 geosynthetic as alternative daily cover (ADC) at the Countywide Recycling and Disposal Facility (Facility) located in Stark County. The request was made in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3)(b).

OAC Rule 3745-27-19(F)(3)(b) states, in part, that the director may approve alternative materials 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.

By letter dated August 4, 2003, Ohio EPA issued an approval to use Style 884 geosynthetic for a 180-day trial period. During this period, the performance of the ADC material was monitored by Ohio EPA and the Stark County Health Department to determine the material's effectiveness and its ability to function in the manner intended. Additionally, the owner/operator submitted a report detailing the performance of Style 884 geosynthetic during the trial period.

Based on the results of Ohio EPA's and the Stark County Health Department's monitoring and the information contained in the report, I have determined that Style 884 geosynthetic functioned effectively as an ADC material. Therefore, pursuant to OAC Rule 3745-27-19(F)(3), I hereby approve the continued use of Style 884 geosynthetic as ADC at the Facility. As part of this approval, the owner/operator is subject to the following conditions:

1. This approval is limited to the use of only Belton Industries, Inc.'s Style 884 geosynthetic at Countywide RDF. No other ADC materials may be used at the Facility without prior authorization from Ohio EPA.

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



2. The owner/operator shall place Style 884 geosynthetic over exposed waste materials by the end of the working day, or more frequently if necessary, to control fire hazards, blowing litter, odor, dust, insects, and rodents.
3. If inclement weather conditions will render the placement or use of Style 884 geosynthetic ineffective or otherwise unsatisfactory, the owner/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/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.
4. If the owner/operator determines that Style 884 geosynthetic is ineffective or otherwise unsatisfactory under normal operating conditions, the owner/operator shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F). Under such circumstances, the owner/operator may apply another ADC material that has been approved for use at the Facility. The owner/operator shall verbally notify Ohio EPA, Northeast District Office (NEDO) and the Stark County Health Department of this action by the end of the next working day and shall submit written notification to Ohio EPA, NEDO within 14 calendar days. This notification is not necessary if use of Style 884 geosynthetic ceases only on a temporary basis in accordance with Condition 3, above.
5. If Ohio EPA determines that the use of Style 884 geosynthetic is ineffective or unsatisfactory under normal operating conditions, then permission to use the ADC material may be revoked upon written notification from the director. Immediately upon such revocation, the owner/operator shall cease to use Style 884 geosynthetic as ADC 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/operator may apply another ADC material that has been approved for use at the Facility.
6. The owner/operator shall promptly repair or replace the ADC material if it becomes frayed, torn, ripped, or otherwise rendered unuseable and is, therefore, no longer able to serve its intended purpose.
7. Style 884 geosynthetic shall not be used as intermediate or final cover at the Facility.
8. Nothing in this approval shall be construed to authorize any waiver from the requirements of any applicable federal or state solid waste laws or regulations. This approval shall not be interpreted to release the owner/operator from responsibility under Ohio Revised Code (ORC) Chapters 3704, 3714, 3734, or 6111; under the Federal Clean Water Act or the Comprehensive Environmental Response, Compensation, and Liability Acts; 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. The appeal must be filed with the commission within 30 days after notice of the director's action. Notice of the filing of the appeal shall be filed with the director within three days after the appeal is filed 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

If you have any questions regarding this approval, please contact Scott Winkler of Ohio EPA's Northeast District Office at (330) 963-1220.

Sincerely,

Christopher Jones  
Director

cc: Scott Winkler, DSIWM, NEDO  
Scott Hester, DSIWM, CO  
Phil Revlock, Stark County Health Department  
File: [Eric Adams/LAND/Countywide RDF/COR/76]