



State of Ohio Environmental Protection Agency

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Mr. Pat Nortz
Browning-Ferris Industries of Ohio, Inc.
530 North Camp Road
Port Clinton, Ohio 43452

**Re: Ottawa County Landfill, Ottawa County
Decline to Grant Approval for an Alternative Daily Cover (Auto Fluff)**

Dear Mr. Nortz:

On June 8, 2004, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received your request to use auto fluff as an alternative daily cover (ADC) at the Ottawa County Landfill (Facility) located in Ottawa County.

Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3) states, in part, that the director may approve alternative materials for use as ADC if the owner or operator can demonstrate to the satisfaction of the director that the alternative material proposed for use can provide protection comparable to six (6) inches of soil and is protective of human health and the environment. There are numerous concerns with using auto fluff as ADC, including fire hazards, wind-driven scattering, dispersal outside the working face by landfill equipment, and the potential for contamination by asbestos, polychlorinated biphenyls, and mercury from switches. For these reasons, you have not made the demonstration required by OAC Rule 3745-27-19(F)(3). Therefore, I decline to approve your request to use auto fluff as ADC at the Facility.

If you have any questions, please contact Beth Skulina of Ohio EPA, NWDO at (419) 373-3141.

Sincerely,

Christopher Jones
Director

CJ/MM/sw

cc: Beth Skulina, DSIWM-NWDO
Scott Hester, DSIWM-CO

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