



State of Ohio Environmental Protection Agency

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Crawford County Board of Commissioners
Crawford County Courthouse
112 East Mansfield Street
Bucyrus, Ohio 44820

Mr. Jack I. Stacy
Santek Environmental
5128 Lincoln Highway East
Bucyrus, Ohio 44820

**Re: Crawford County Landfill, Crawford County
Alternative Daily Cover Approval**

Dear Commissioners and Mr. Stacy:

On May 6, 2005, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received your written request for authorization to use Little Scioto River dredgings and soils from Sawyer Ludwig Park stabilized with cement kiln dust (CKD) as alternative daily cover material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3) at the Crawford County Landfill (Facility).

OAC Rule 3745-27-19(F)(3)(a) states, “[t]he director may approve solid waste to be used as alternative material for daily cover if the owner or operator can demonstrate to the satisfaction of the director that the solid waste proposed for use can provide protection comparable to six inches of soil and is protective of human health and the environment.”

Ohio EPA has reviewed the information contained in the May 6, 2005, request, and we have determined that the Little Scioto River dredgings and soils from Sawyer Ludwig Park stabilized with CKD (hereinafter referred to as Remediation Soils) have the potential to function effectively as alternative daily cover material and provide protection comparable to six inches of soil as required by OAC Rule 3745-27-19(F)(3)(a). Therefore, pursuant to OAC Rule 3745-27-19(F)(3)(a), I hereby authorize the owner or operator to use the Remediation Soils as alternative daily cover material at the Facility.

Bob Taft, Governor
Jennette Bradley, Lieutenant Governor
Joseph P. Koncelik, Director

As part of this approval, the owner or operator is subject to the following conditions:

CONDITIONS

1. This approval only authorizes the owner or operator to use the Remediation Soils, as specified in Condition Number 2, as alternative daily cover material at the Crawford County Landfill. No other alternative daily cover material may be used at the Facility without prior authorization from Ohio EPA.
2. The owner or operator shall use only Little Scioto River dredgings and soils from Sawyer Ludwig Park stabilized with CKD (Remediation Soils) as alternative daily cover material at the Facility, as described in the request received by Ohio EPA on May 6, 2005.
3. The owner or operator shall place the Remediation Soils over exposed waste materials by the end of the working day, or more frequently as necessary, to control fire hazards, blowing litter, odors, dust, insects, and rodents.
4. If inclement weather conditions render the placement or the use of the Remediation Soils 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 alternative daily cover material that has been approved for use at the Facility, provided that the alternative daily cover material is able to perform effectively under the inclement conditions.
5. If the owner or operator determines that the Remediation Soils are 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 alternative daily cover material that has been approved for use at the Facility. The owner or operator shall verbally notify Ohio EPA, NWDO, and the Crawford County Health Department of this action by the end of the next working day and shall submit written notification to Ohio EPA, NWDO, and the Crawford County Health Department within fourteen (14) calendar days. This notification is not necessary if use of the Remediation Soils ceases on a temporary basis in accordance with Condition Number 4, above.
6. If Ohio EPA or the Crawford County Health Department determines that the Remediation Soils are ineffective or otherwise unsatisfactory under normal operating conditions, then permission to use the Remediation Soils may be revoked upon written notification from the Director of Ohio EPA (Director). Immediately upon such revocation, the owner or operator shall cease using the Remediation Soils as alternative daily cover 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 alternative daily cover material that has been approved for use at the Facility.

7. The Remediation Soils shall not be used as intermediate or final cover. Any solid waste disposal area that remains inactive for a period of seven (7) days, and that has been covered with the Remediation Soils, 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. Prior to applying the soil cover, the Remediation Soils shall be removed or otherwise prepared, as necessary, so as not to impede the flow of leachate to the leachate management system.
8. The use and location of the Remediation Soils as alternative daily cover material shall be documented on the required Municipal Solid Waste Landfill Daily Log of Operations, Form 3 each day they are used as alternative daily cover material.
9. The owner or operator shall collect and remit the applicable solid waste management district generation fee for any Remediation Soils that are received at the Facility.
10. The Facility may stockpile the Remediation Soils in accordance with the following conditions:
 - a. The Remediation Soils shall be placed on a prepared clay surface which has been covered with 40 mil HDPE liner material and which is located within the landfill footprint.
 - b. The Remediation Soils shall be covered with an impermeable membrane to prevent infiltration of precipitation.
 - c. Records of the date and amount of materials added to and removed from the stockpile shall be maintained and made available to Ohio EPA or the Crawford County Health Department upon request.
 - d. Not later than twelve (12) months after receipt, the Remediation Soils shall be utilized as alternative daily cover material or otherwise disposed in a licensed solid waste disposal facility.
11. Nothing in this letter shall be construed to authorize any waiver from the requirements of any other applicable federal or state laws or regulations except as specified herein. 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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission (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 thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director within three (3) 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

If you have any questions concerning this authorization, please contact Mary Ann Miller of Ohio EPA, NWDO at (419) 373-3060.

Sincerely,

Joseph P. Koncelik
Director

JPK/MAM/MM/sw

pc: Ms. Jackie Ward, Crawford County Health Department
Ms. Mary Ann Miller, Ohio EPA, DSIWM-NWDO
Ms. Ellen Gerber, Ohio EPA, DSIWM-NWDO
Mr. Scott Hester, Ohio EPA, DSIWM-CO