



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director OHIO E.P.A.

JUN 25 2015

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ENTERED DIRECTOR'S JOURNAL

Scott Perry
Landfill Manager
Solid Waste Authority of Central Ohio
4239 London Groveport Road
Grove City, OH 43123-9518

Re: Franklin County Sanitary Landfill
Director's Authorization
Approval
Municipal Solid Waste Landfills
Franklin County
MSWL018803

**Subject: Franklin County Sanitary Landfill, Franklin County
Temporary Alternative Daily Cover Material Approval
Auto Shredder Residue Combined with Posi-Shell**

Dear Mr. Perry:

On March 16, 2015, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Central District Office (CDO) received a request for authorization dated March 10, 2015 to use auto shredder residue (ASR) from Columbus Auto Shredding, Inc. (CASI) as alternative daily cover (ADC) material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3) at the Franklin County Sanitary Landfill (Facility) in Franklin County. A revision to the request was received on June 4, 2015. The Solid Waste Authority of Central Ohio (SWACO) is the owner and operator of the Facility. The request proposed use of ASR as a stand-alone ADC application and also application of ASR in combination with Posi-Shell Advanced Formulation (Posi-Shell) as ADC at the Facility.

OAC Rule 3745-27-19(F)(3)(a) states, "The 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 material proposed for use can provide protection comparable to six inches of soil and is protective of human health and environment. The owner or operator must obtain written approval to use solid waste for alternative daily cover prior to utilizing the solid waste."

Ohio EPA has reviewed the information contained in the March 10, 2015 request, as revised on June 4, 2015, and has determined that ASR in combination with Posi-Shell 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)(a), I hereby authorize SWACO to use ASR in combination with Posi-Shell as ADC material at the Facility for the trial period of one hundred eighty (180) days from the effective date of this authorization.

As part of this approval, SWACO is subject to the following conditions:

CONDITIONS

1. This approval is limited only to the use of ASR from CASI in combination with Posi-Shell (ASR/Posi-Shell), as described in the March 10, 2015 request and subsequent revision, at the Facility. No other ADC material may be used at the Facility without prior authorization from Ohio EPA.
2. SWACO shall place ASR/Posi-Shell over exposed waste materials by 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. ASR/Posi-Shell shall be applied such that all waste materials are completely covered. Prior to placing the next layer of waste, ASR/Posi-Shell shall be removed or otherwise prepared as necessary so as not to impede the flow of leachate to the leachate management system.
3. If inclement weather conditions render the placement or use of ASR/Posi-Shell ineffective or otherwise unsatisfactory, SWACO 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, SWACO 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 SWACO determines ASR/Posi-Shell is ineffective or otherwise unsatisfactory under normal operating conditions, SWACO shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F). Under such circumstances, SWACO may apply another ADC material that has been approved for use at the Facility. SWACO shall verbally notify Ohio EPA, DMWM, CDO and Franklin County Public Health of this action by the end of the next working day and shall submit written notification to Ohio EPA, DMWM, CDO within fourteen (14) calendar days. This notification is not necessary if use of ASR/Posi-Shell ceases only on a temporary basis in accordance with Condition Number 3.
5. If Ohio EPA or Franklin County Public Health determines that the use of ASR/Posi-Shell is ineffective or otherwise unsatisfactory under normal operating conditions, then permission to use ASR/Posi-Shell may be revoked upon written notification from the Director of Ohio EPA (Director). Immediately upon such revocation, SWACO shall cease using ASR/Posi-Shell 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, SWACO may apply another ADC material that has been approved for use at the Facility.

6. ASR/Posi-Shell shall not be used as intermediate cover or final cover at the Facility. Any solid waste disposal area that has been covered with ASR/Posi-Shell and inactive for a period of three (3) days 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 third day.
7. The use and location of ASR/Posi-Shell shall be documented in the required Municipal Solid Waste Landfill Daily Log of Operations, Form 3 on each day it is used as ADC material.
8. Not later than one hundred twenty (120) days after the effective date of this authorization, SWACO shall submit a report to Ohio EPA, CDO comparing the effectiveness of using ASR/Posi-Shell to conventional soil cover. The report shall contain a discussion of the following items:
 - a. The number of days that ASR/Posi-Shell was used;
 - b. Weather conditions at the time of placement of ASR/Posi-Shell;
 - c. Number of days odors were detected;
 - d. The presence of vectors, rodents, or insects;
 - e. Any increase in blowing litter;
 - f. Any increase or decrease in the amount of erosion as compared to areas with conventional soil cover;
 - g. Any incidents of fire at the working face during the use of ASR/Posi-Shell as ADC;
 - h. Methods for controlling fire during use of ASR/Posi-Shell.
9. This authorization to use ASR/Posi-Shell as ADC material shall expire one hundred eighty (180) days after its effective date. SWACO shall not continue to use ASR/Posi-Shell after this date unless the report required by Condition 8 is submitted and authorization for the continued use of ASR/Posi-Shell as ADC material is granted.
10. Photographs from at least two opposing sides of the working face shall be taken each day that ASR/Posi-Shell has been applied. All photographs shall be maintained at the Facility and made available to Ohio EPA and Franklin County Public Health upon request. The photographs shall be marked with the date and time that the photograph was taken along with

the name of the photographer, the direction the picture was taken, and a description of the general area in which the photograph was taken.

11. ASR/Posi-Shell shall only be applied as ADC material on interior slopes of the landfill where surface water that may contact the ASR/Posi-Shell will be contained within the confines of the leachate collection system.
12. ASR/Posi-Shell shall be used as described in the March 10, 2015 request and June 4, 2015 revision on the same day as delivery from CASI. Any ASR delivered to the Facility which is not used for ADC shall be disposed at the Facility on the same calendar day it is delivered to the Facility.
13. All appropriate state and local solid waste fees shall be applied to the ASR, regardless of whether it is temporarily stored, utilized as ADC material, or disposed of in the working face.
14. Any ASR brought to the Facility for disposal or use as ADC material shall be counted toward the Facility's authorized maximum daily waste receipt.
15. All stockpiles or storage areas for the ASR shall be located within the current phase of operation. Any water that comes into contact with the ASR or ASR/Posi-Shell, either during use as ADC material or during storage, shall be directed to the leachate collection system.
16. 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 SWACO 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.

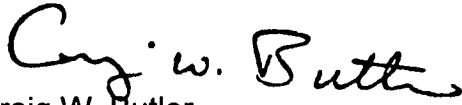
You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The 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:

Scott Perry
SWACO
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Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

If you have any questions regarding this authorization, please contact Allan Hurtt of Ohio EPA, DMWM, CDO at (614) 728-3889.

Sincerely,



Craig W. Butler
Director

c: Melissa Storch, DMWM, CDO
Scott Hester, DMWM, CO
Jeff Grose, Franklin County Health Department
Ron Zitek, North Point Engineering

AH/cf