



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

OHIO E.P.A.

MAR 11 2016

ENTERED DIRECTOR'S JOURNAL

MAR 11 2016

Matt Reardon, Environmental Manager  
Solid Waste Authority of Central Ohio  
4329 London-Groveport Road  
Grove City, Ohio 43123

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

**Subject: Franklin County Sanitary Landfill, Franklin County  
Alternative Daily Cover Material Approval  
Columbus Auto Shredding, Inc. Auto Shredder Residue**

Dear Mr. Reardon:

On January 20, 2016, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Central District Office (CDO) received a written request for authorization to use automobile shredder residue 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. Solid Waste Authority of Central Ohio (SWACO) is the current owner and operator of 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 the environment. The owner or operator must obtain written approval to use an alternative material and/or thickness for daily cover prior to utilizing the solid waste."

Specifically, the owner or operator requested to use auto shredder residue produced by Columbus Auto Shredding Inc. (CASI ASR). Ohio EPA has reviewed the information contained in the request and has determined that the CASI ASR has the properties 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 CASI ASR as an ADC material at the Facility.

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

## CONDITIONS

1. This approval is limited to the use of only CASI ASR at the Facility. No other ADC material may be used at the Facility without prior authorization from Ohio EPA.
2. SWACO shall place CASI ASR 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. CASI ASR shall be applied such that all waste materials are completely covered. Prior to placing the next layer of waste, CASI ASR shall be removed or otherwise prepared as necessary so as not to impede the flow of leachate to the leachate management system. Any CASI ASR removed prior to placing the next layer of waste shall be disposed of and not re-used as ADC.
3. If inclement weather conditions render the placement or use of CASI ASR 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 CASI ASR 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 CASI ASR 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 CASI ASR is ineffective or otherwise unsatisfactory under normal operating conditions, then permission to use CASI ASR may be revoked upon written notification from the Director of Ohio EPA (Director). Immediately upon such revocation, SWACO shall cease using CASI ASR 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. CASI ASR shall not be used as intermediate cover or final cover at the Facility. Any solid waste disposal area that has been covered with CASI ASR and inactive

for a period of one (1) day following placement of CASI ASR shall be covered with at least six (6) inches of soil, in accordance with OAC Rule 3745-27-19(F), not later than the end of the next calendar day following the day the CASI ASR was placed. CASI ASR shall not remain in place as ADC on weekend days or holidays when the Facility is not open for normal operations.

7. The use and location of CASI ASR 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. CASI ASR shall only be applied as ADC material on interior slopes of the landfill where surface water that may contact the CASI ASR will be contained within the confines of the leachate collection system.
9. CASI ASR shall be placed as ADC material in the wet form that comes directly from Columbus Auto Shredding Inc. and placed as ADC material on the same day as delivery. Any CASI 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.
10. All appropriate state and local solid waste fees shall be applied to the CASI ASR, regardless of whether it is temporarily stored, utilized as ADC material, or disposed of in the working face.
11. Any CASI ASR brought to the Facility for disposal or use as ADC material shall be counted toward the Facility's authorized maximum daily waste receipt.
12. All stockpiles or storage areas for the CASI ASR shall be located within the current phase of operation. Any water that comes into contact with or is released from the CASI ASR, either during use as ADC material or during storage, shall be directed to the leachate collection system.
13. 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

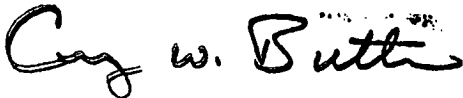
Matt Reardon  
Solid Waste Authority of Central Ohio  
Page 4

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:

Environmental Review Appeals Commission  
77 South High Street, 17<sup>th</sup> Floor  
Columbus, OH 43215

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

Sincerely,



Craig W. Butler  
Director

c: Jeff Grose, Franklin County Public Health  
Scott Hester, DMWM/CO  
Melissa Storch, DMWM/CDO