



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

NOVEMBER 7, 2017

Crawford County Board of Commissioners
Crawford County Courthouse
112 East Mansfield Street
Bucyrus, Ohio 44280

and

Mr. Gary Adkins
Santek Environmental
5128 Lincoln Highway East
Bucyrus, Ohio 44820

Re: Crawford County Landfill
Director's Authorization
Approval
Municipal Solid Waste Landfills
Crawford County
MSWL018774

Ohio EPA NOV 7 '17
Entered Directors Journal

**Subject: Crawford County Landfill, Crawford County
Alternative Daily Cover Material Temporary Approval
Auto Shredder Residue**

Dear Commissioners and Mr. Adkins:

The Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO) received a request for authorization to use auto shredder residue (ASR) from Milliron Industries as an alternative daily cover (ADC) material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3)(a) at the Crawford County Landfill (Facility) in Bucyrus, Ohio. Santek Environmental of Ohio, LLC (Santek) is the current 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 solid waste for alternative daily cover prior to utilizing the solid waste."

Ohio EPA has reviewed the information contained in the request and has determined that ASR 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 the owner or operator of the Crawford County Landfill to use ASR as an ADC material at the Facility for a trial period of one hundred eighty (180) days from the effective date of this authorization.

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

CONDITIONS

1. This approval is limited to the use of only ASR generated from Milliron Industries of Mansfield, Ohio. No other ADC material may be used at the Facility without prior authorization from Ohio EPA.
2. Santek shall place a 6 to 12-inch-thick layer of 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. ASR shall be applied such that all waste materials are completely covered. Prior to placing the next layer of waste, ASR shall be 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 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, Santek 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 Santek determines ASR is ineffective or otherwise unsatisfactory under normal operating conditions, Santek shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F). Under such circumstances, Santek may apply another ADC material that has been approved for use at the Facility. Santek shall verbally notify Ohio EPA, DMWM, NWDO and Crawford County Public Health of this action by the end of the next working day and shall submit written notification to Ohio EPA, DMWM, NWDO within fourteen (14) calendar days. This notification is not necessary if use of ASR ceases only on a temporary basis in accordance with Condition Number 3.
5. If Ohio EPA or Crawford County Public Health determines that the use of ASR is ineffective or otherwise unsatisfactory under normal operating conditions, then permission to use ASR may be revoked upon written notification from the Director of Ohio EPA (Director). Immediately upon such revocation, Santek shall cease using 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, Santek may apply another ADC material that has been approved for use at the Facility.
6. ASR shall not be used as intermediate or final cover at the Facility. Any solid waste disposal area that remains inactive for a period of one (1) day and which has been covered with 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 ASR was placed. ASR shall not remain in place on weekend days or holidays when the Facility is not open for normal operations.
7. Santek shall promptly reapply ASR if waste becomes exposed.

8. The use and location of 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.
9. Not later than one hundred twenty (120) days after the effective date of this authorization, Santek shall submit a report to Ohio EPA, NWDO comparing the effectiveness of using ASR to conventional soil cover. The report shall contain a discussion of the following items:
 - a. The number of days ASR was used;
 - b. Weather conditions at the time of placement of ASR;
 - c. Number of days odors were detected;
 - d. The presence of vectors, rodents, or insects;
 - e. Any increase in blowing litter;
 - f. Any incidents of fire at the working face during the use of ASR;
 - g. Methods for controlling fire during use of ASR;
 - h. Any increase or decrease in the amount of erosion as compared to areas with conventional soil cover.
10. This authorization to use ASR as ADC material shall expire one hundred eighty (180) days after its effective date. Santek shall not use the ASR after this date unless the report required by Condition 8 is submitted and authorization for the continued use of ASR as ADC material is granted.
11. Photographs from at least two opposing sides of the working face shall be taken each day that ASR has been applied. All photographs shall be maintained at the Facility and made available to Ohio EPA and Crawford 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.
12. All stockpiles and storage areas for the ASR shall be located within the current phase of operation. Any water that comes in contact with the ASR, either during use as ADC material or during storage, shall be directed to the leachate collection system.
13. ASR shall only be used as ADC material on interior slopes from which no runoff will discharge to the Facility's surface water management structures.
14. ASR shall be placed as ADC material on the same day as delivery. Any ASR delivered to the Facility which is not used for ADC shall be disposed of at the Facility on the same calendar day it is delivered to the Facility.
15. Any ASR used as ADC material at the Facility shall be counted toward the Facility's authorized maximum daily waste receipt.
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 the owner or operator 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

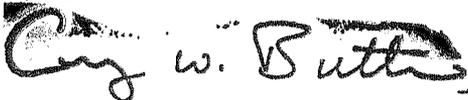
applicable requirements for remedying conditions resulting from any release of contaminants to the environment.

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:

Environmental Review Appeals Commission
30 East Broad Street, 4th Floor
Columbus, Ohio 43215

If you have any questions regarding this authorization, please contact Ned O'Loughlin of Ohio EPA, DMWM, NWDO at (419) 373-3062.

Sincerely,



Craig W. Butler
Director

cc: Steve Jozwiak, Crawford County Public Health
Ron Vail, Rumpke Waste of Northern Ohio
Ron Zitek, North Point Engineering
Ned O'Loughlin, DMWM-NWDO
Mike Reiser, DMWM-NWDO