



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

JULY 24, 2018

Mr. Alvie Green
Rumpke of Northern Ohio, Inc.
Noble Road Landfill
170 Noble Road East
Shiloh, Ohio 44878

Re: Noble Road Landfill
Director's Authorization
Approval
Municipal Solid Waste Landfills
Richland County
MSWL018820

Ohio EPA JUL 24 '18
Entered Directors Journal

**Subject: Noble Road Landfill, Richland County
Alternative Daily Cover Material Approval**

Dear Mr. Green:

On May 25, 2018, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northwest District Office (NWDO) received a written request for authorization to use auto shredder residue generated by Milliron Industries of Mansfield, Ohio (MI ASR) as alternative daily cover (ADC) material in accordance with Ohio Administrative Code (OAC) Rule 3745-27-19(F)(3)(a) at Noble Road Landfill (Facility) in Richland County. Rumpke of Northern Ohio, Inc. (Rumpke) is the current owner 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 the MI ADC 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 Rumpke to use MI ASR as an alternative daily cover material at the Facility.

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

CONDITIONS

1. This approval is limited to the use of only MI ASR at the Facility. No other ADC material may be used at the Facility without prior authorization from Ohio EPA.
2. Rumpke shall place a six (6) to twelve (12)-inch thick layer of MI 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. MI ASR shall be applied such that all solid waste is completely covered. Prior to placing the next layer of waste, MI ASR 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 MI ASR ineffective or otherwise unsatisfactory, Rumpke 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, Rumpke 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 Rumpke determines MI ASR is ineffective or otherwise unsatisfactory under normal operating conditions, Rumpke shall immediately revert to using conventional soil cover in accordance with OAC Rule 3745-27-19(F). Under such circumstances, Rumpke may apply another ADC material that has been approved for use at the Facility. Rumpke shall verbally notify Ohio EPA, DMWM, NWDO and Richland 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 MI ASR ceases only on a temporary basis in accordance with Condition Number 3.
5. If Ohio EPA or Richland Public Health determines that the use of MI ASR is ineffective or otherwise unsatisfactory under normal operating conditions, then permission to use MI ASR may be revoked upon written notification from the Director of Ohio EPA (Director). Immediately upon such revocation, Rumpke shall cease using MI 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, Rumpke may apply another ADC material that has been approved for use at the Facility.
6. MI 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 seven (7) days and which has been covered with MI ASR 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.

7. Rumpke shall promptly reapply MI ASR if waste becomes exposed.
8. The use and location of MI 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. MI ASR shall be stored and utilized only on the working face and internal slopes where surface water that may contact MI ASR will be contained within the confines of the leachate collection system.
10. The MI ASR shall be counted against the Facility's authorized maximum daily waste receipt.

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.

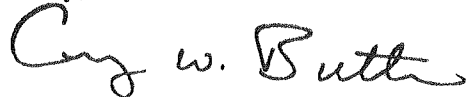
You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The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

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OAC Rule 3745-27-19(F)(3)(a)
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If you have any questions concerning this letter, please contact Susan Hardy of Ohio EPA, NWDO at (419) 373-3043.

Sincerely,

A handwritten signature in black ink that reads "Craig W. Butler". The signature is written in a cursive style with a large initial "C" and a long, sweeping underline.

Craig W. Butler
Director

ec: Mike Reiser, NWDO, DMWM
Ned O'Loughlin, NWDO, DMWM
Scott Hester, DMWM, CO
Joe Harrod, Richland Public Health
David Murphy, Rumpke Waste & Recycling Services
Chris Jaquet, EEAD, Rumpke Waste & Recycling Services