

Report of Progress, October 31, 2008

Pursuant to Administrative Settlement Agreement and Order on Consent for Removal Action

Docket No. V-W-08-C-897

Countywide Recycling and Disposal Facility
East Sparta, Stark County, Ohio
Respondent: Republic Services of Ohio II, LLC (Republic)

Paragraph 15.a and b Enhanced Gas Extraction and Temperature Monitoring.

As of October 31, 2008, all components of the enhanced gas extraction and temperature monitoring system were in place and fully restored from the damage suffered by the September 14 Hurricane Ike-related windstorm (with the exception of FBMP 2R, -3R, and 11). These features are illustrated in Attachment A-1.

However, the enhanced gas extraction system Gas Break operational status is currently on hold until a decision is made by the U.S. EPA whether or not to construct an excavated Isolation Break in lieu of the Gas Break required by Paragraph 15.a of the AOC.

Throughout October, readings were obtained from the FBMP temperature probes. Results are presented in Attachment A-2. No significant increasing or decreasing temperature trends are apparent.

Paragraph 15.c and f Capping and Stabilization.

As of October 31, the entire 39 acres of proposed temporary FML cap and related subcap drainage features were complete as shown in Attachment B. Some related surface water and leachate management related features are still in progress, but the temporary cap is complete.

In early November, the "Operations and Maintenance Plan for Temporary Cap System" will be submitted, and by mid-November, a joint Countywide-U.S. EPA-Ohio EPA walkover inspection will be conducted to determine what other areas may need augmentation. Then, capping augmentation (current plans indicated with yellow shading in Attachment B) will proceed.

Composite capping is still on hold until USEPA, OEPA, and Countywide resolve details for a composite cap cross section.

Paragraph 15.e Air Monitoring and Sampling.

Stage B – Interim Fixed Continuous Monitoring. This monitoring was continued through October. Occasional SUMMA canisters were collected for TO-15 analyses based on verified PID readings greater than 250 ppb. Detailed daily graphs and wind roses of this monitoring are posted on the FTP site at <ftp://ftp.earthtech.com/> in the "Stage B Results" subfolder of the "Ambient Air Monitoring" folder. Summary daily average graphs are provided in Attachment C of this Progress report.

Preliminary review of the data indicates occasional transient VOC elevations associated with specific site activities and changes in wind speed and direction. On 10/9/2008-10/10/2008, Site 5 readings averaged approximately 700 parts per billion VOCs; however, these readings were verified to be due to pump error by a technician on site who then replaced the pump. To date, Stage B results indicate typical levels of VOCs based on historical monitoring at the site. A detailed summary and analysis of Stage B data will be prepared by CTEH after the conclusion of Stage B ambient air monitoring.

Stage B monitoring will be run concurrent with Stage C monitoring until the Stage C continuous PID monitoring is fully-implemented, at which time, Stage B monitoring will be discontinued.

Stage C – Final Fixed Continuous Monitoring. Installation of this system was completed in early October 2008. It is currently running and going through the automation/debugging/programming process. The first two weeks of data collected by Stage C monitoring was submitted to U.S. EPA for evaluation and selection of SUMMA trigger levels.

Paragraph 15.g Aerial Infrared Imaging.

August 2008 and October 2008 aerial infrared images are provided in Attachment D along with a diagram to outline the approximate coverage of the images. Both images were taken in the pre-dawn hours. The ambient air temperature during the August image was 67.5° F and during the October image was 43° F. Comparison of these images generally shows the same subcap warm areas attributed to subcap leachate outbreaks and transmittal of gas through subcap cracking. Any changes appear to reflect correlation to the ambient air temperatures, with no large aerial changes or trends.

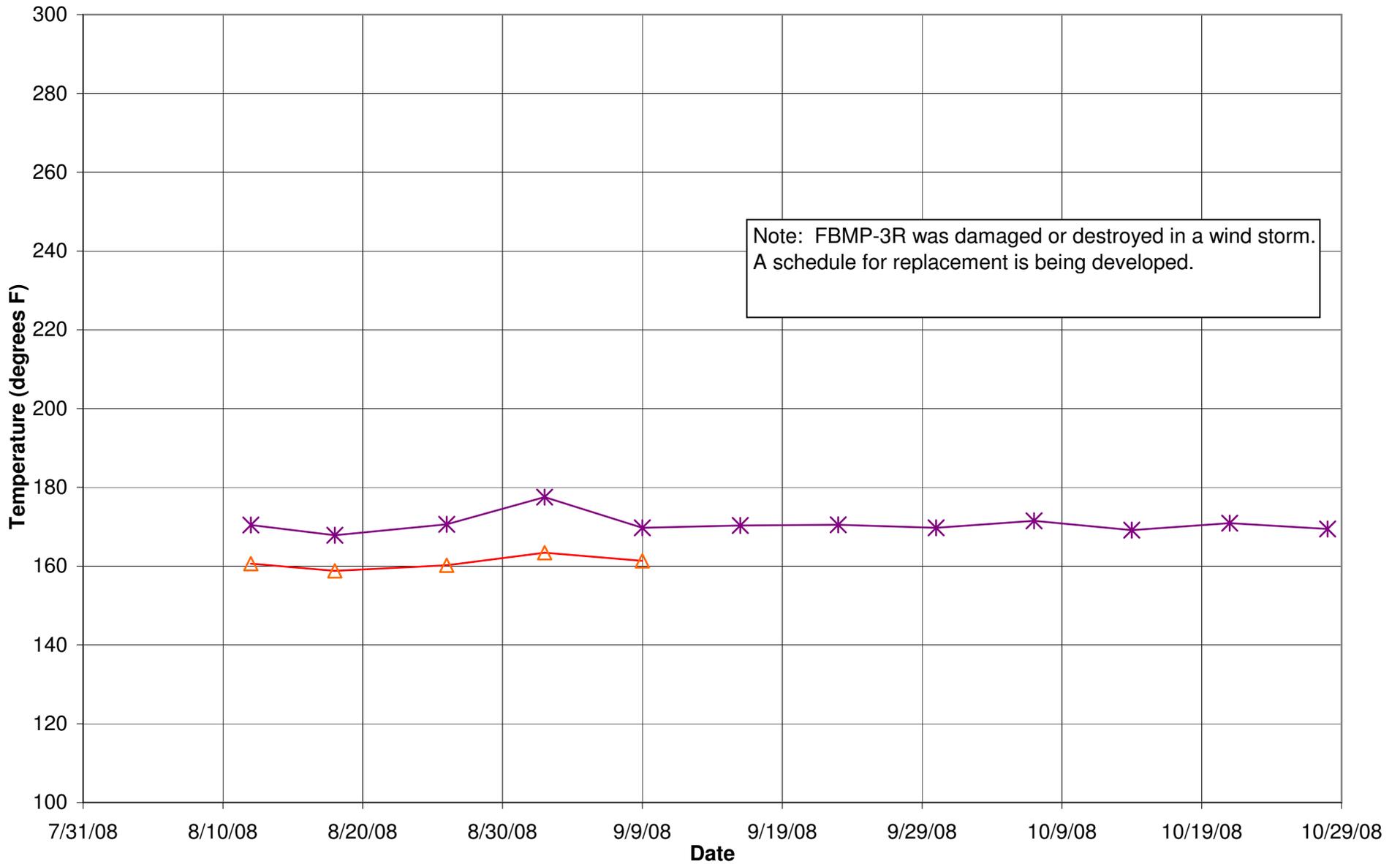
ATTACHMENT A-1

ENHANCED GAS EXTRACTION AND TEMPERATURE MONITORING PROGRESS

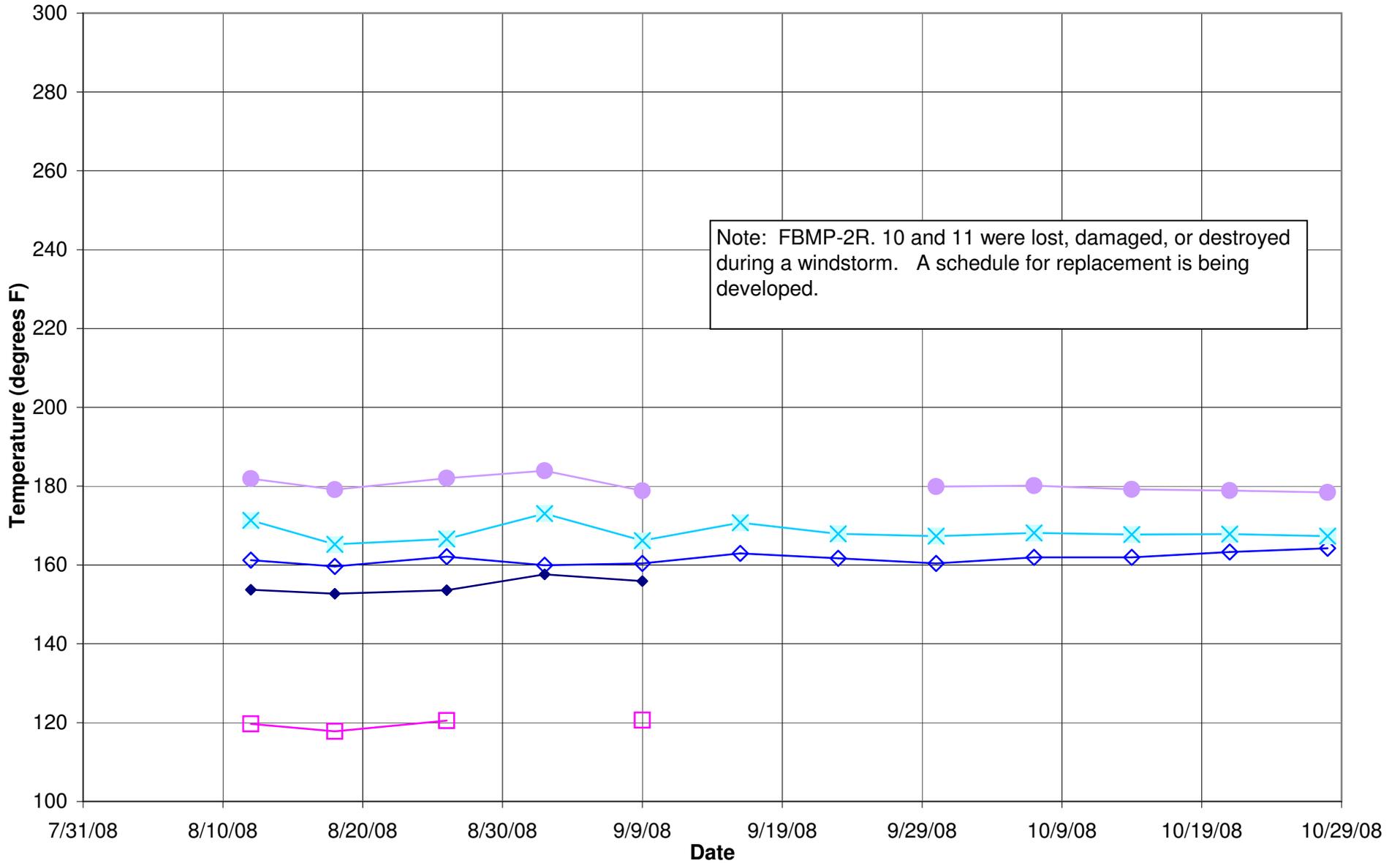
ATTACHMENT A-2

FBMP TEMPERATURE PROBE GRAPHS

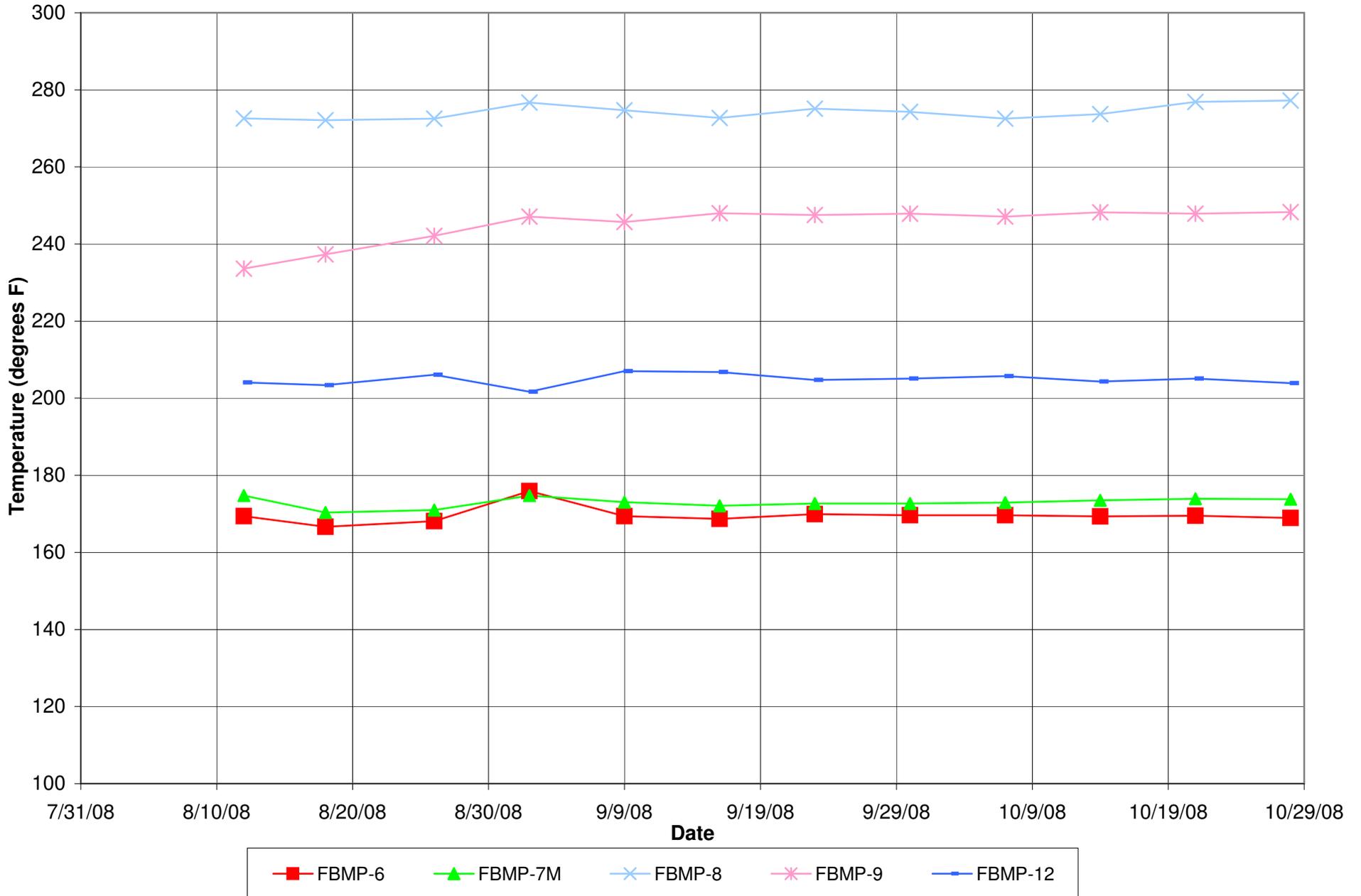
In-situ Temperatures - FBMPS within the Isolation Break Excavation Maximum Readings per Date per FBMP Boring



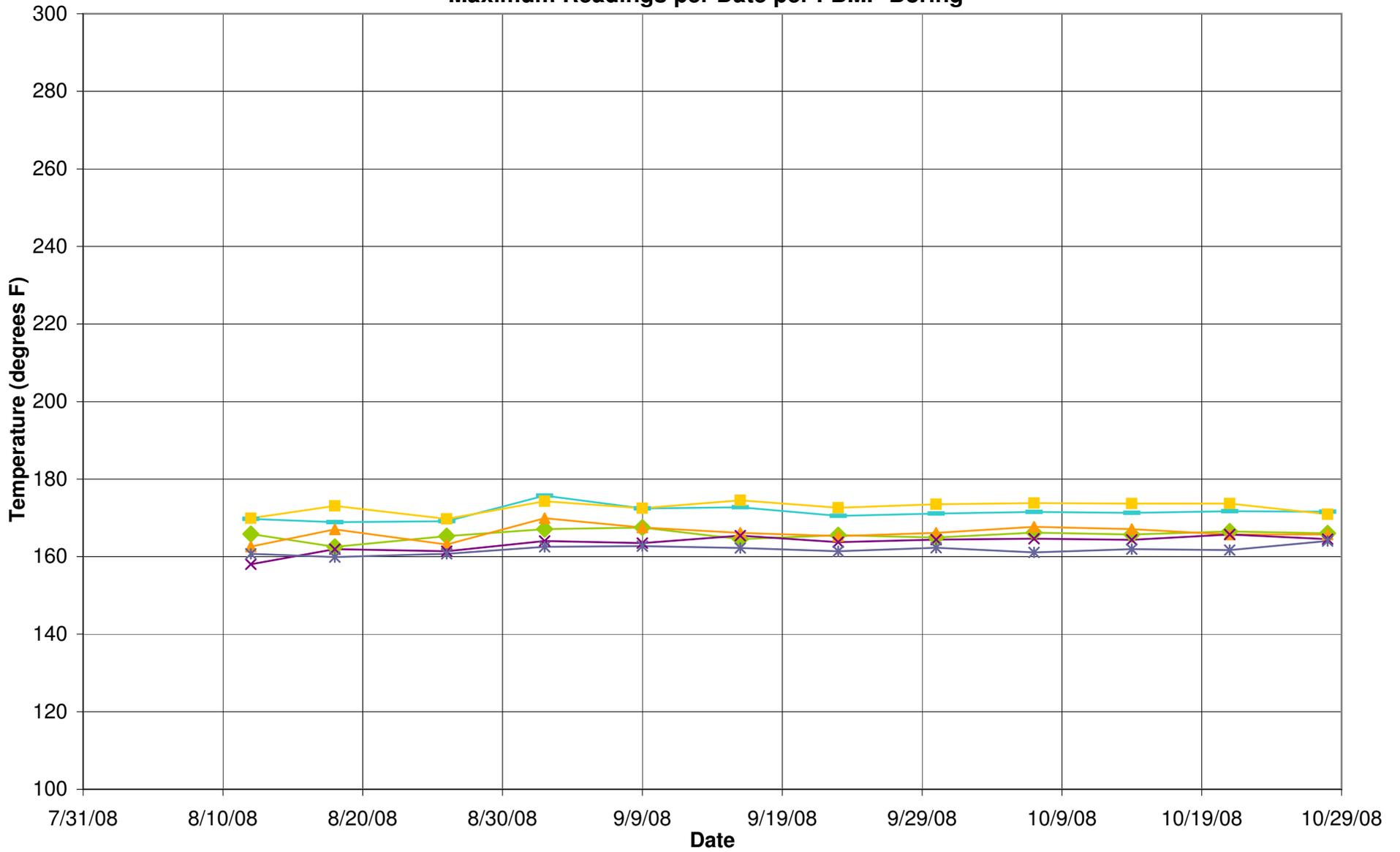
In-situ Temperatures - FBMPs within 150 ft of the Isolation Break Excavation Maximum Readings per Date per FBMP Boring



In-situ Temperatures - FBMPs beyond 150 ft from Isolation Break Excavation Maximum Readings per Date per FBMP Boring



In-situ Temperatures - West Slope FBMPs Maximum Readings per Date per FBMP Boring



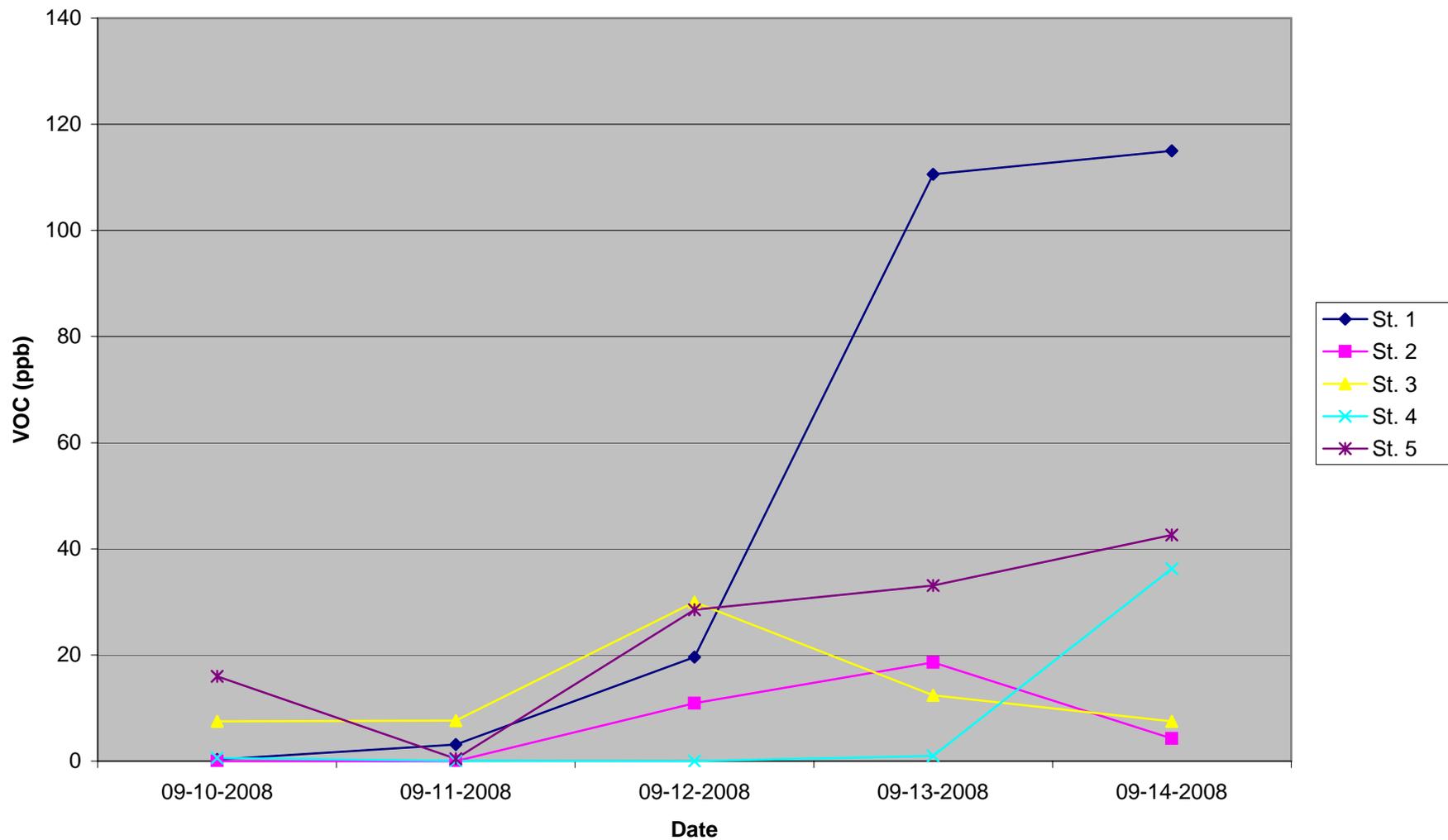
ATTACHMENT B

CAPPING AND STABILIZATION PROGRESS

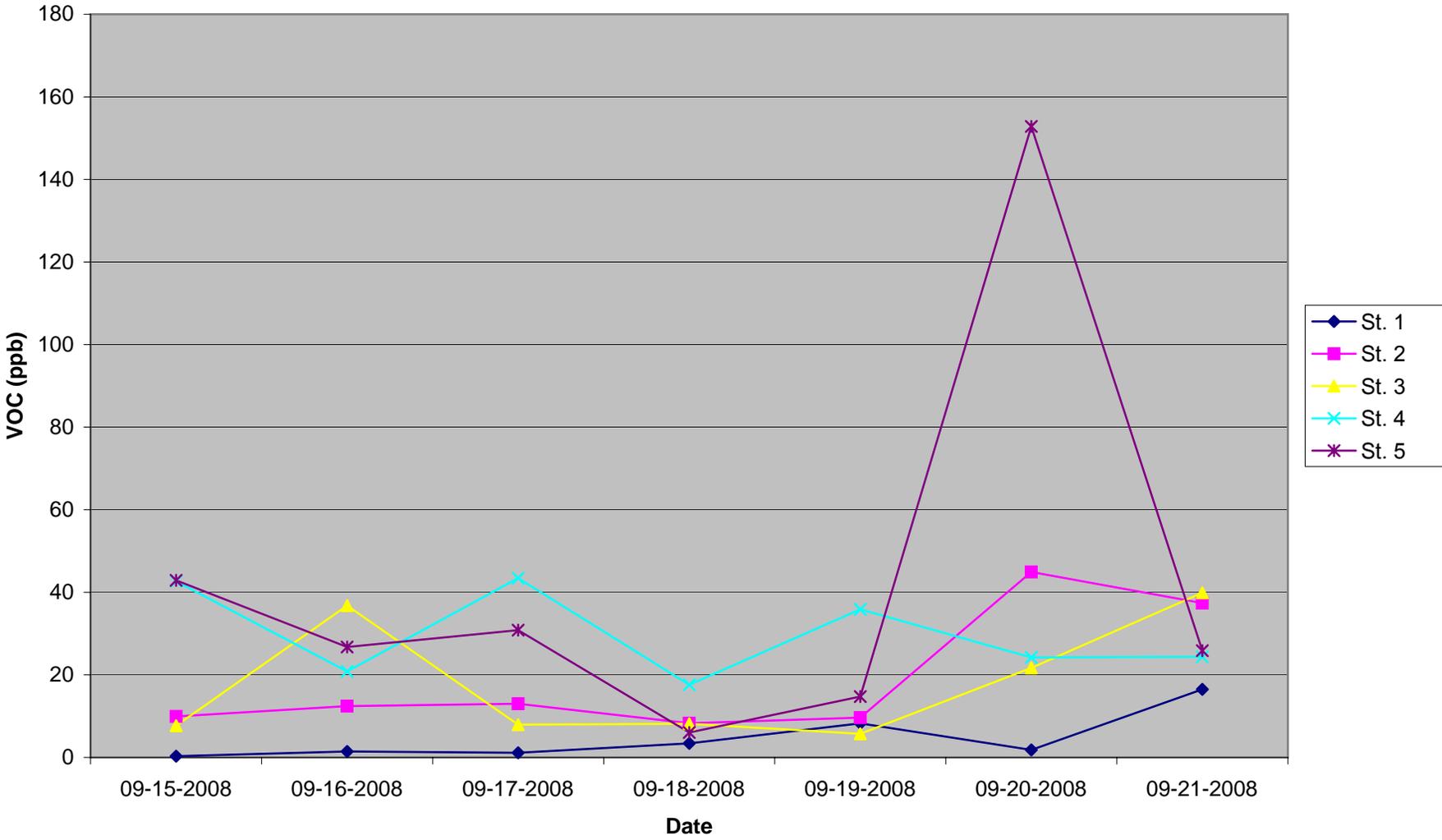
ATTACHMENT C

AIR MONITORING OF REMEDIAL CONSTRUCTION ACTIVITIES

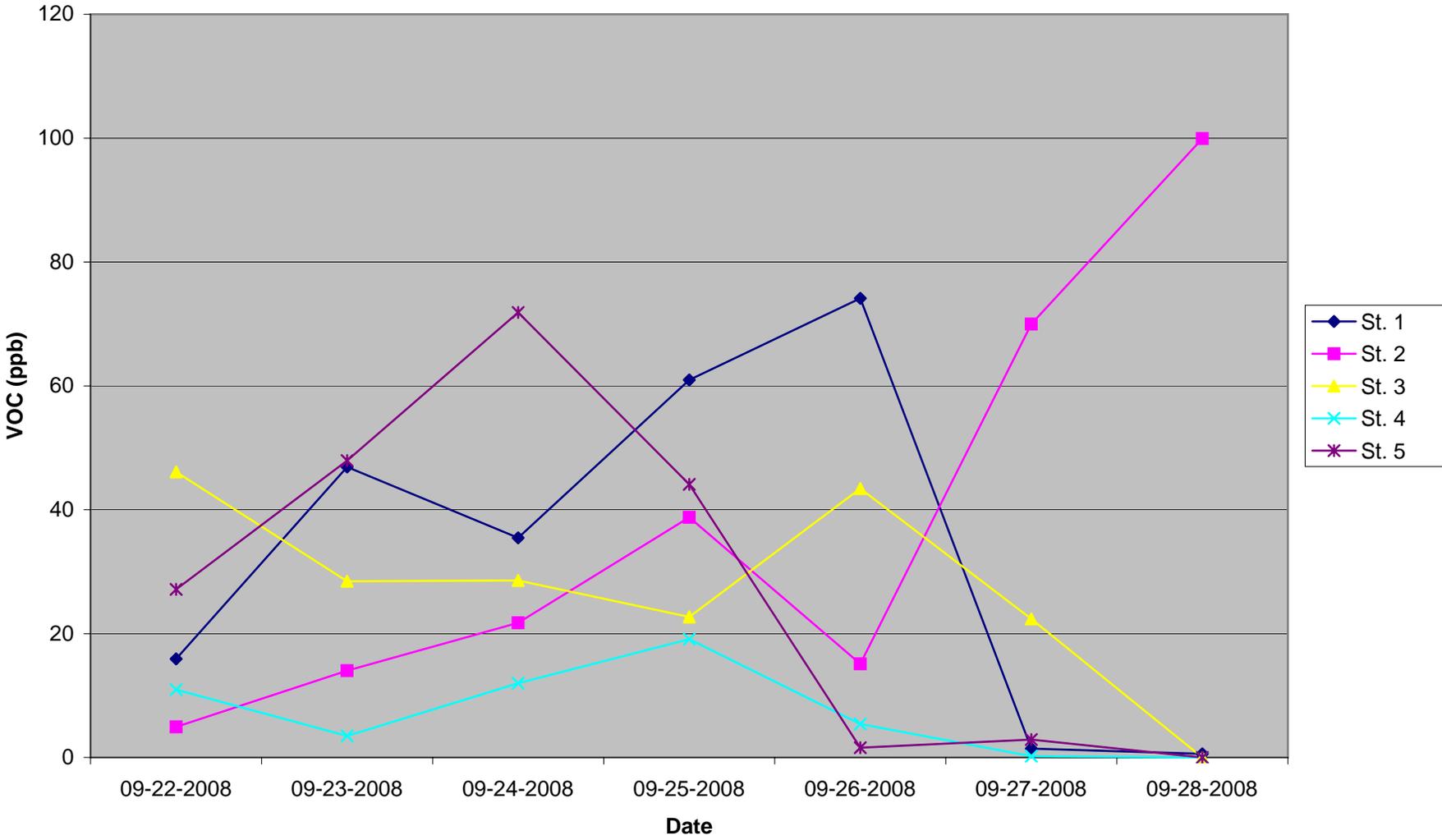
Stage B 24 Hour Average Weekly Summary



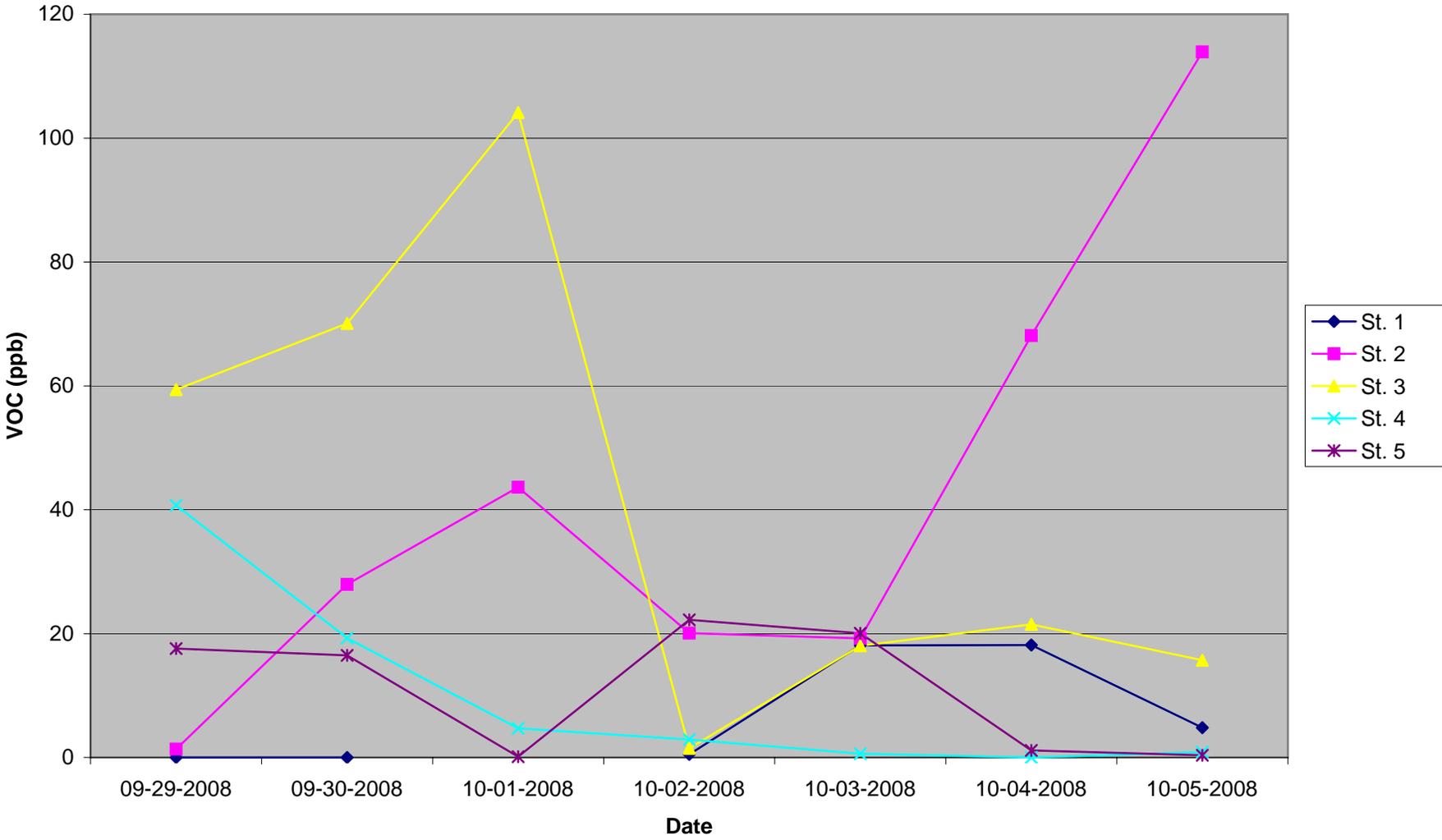
Stage B 24 Hour Average Weekly Summary



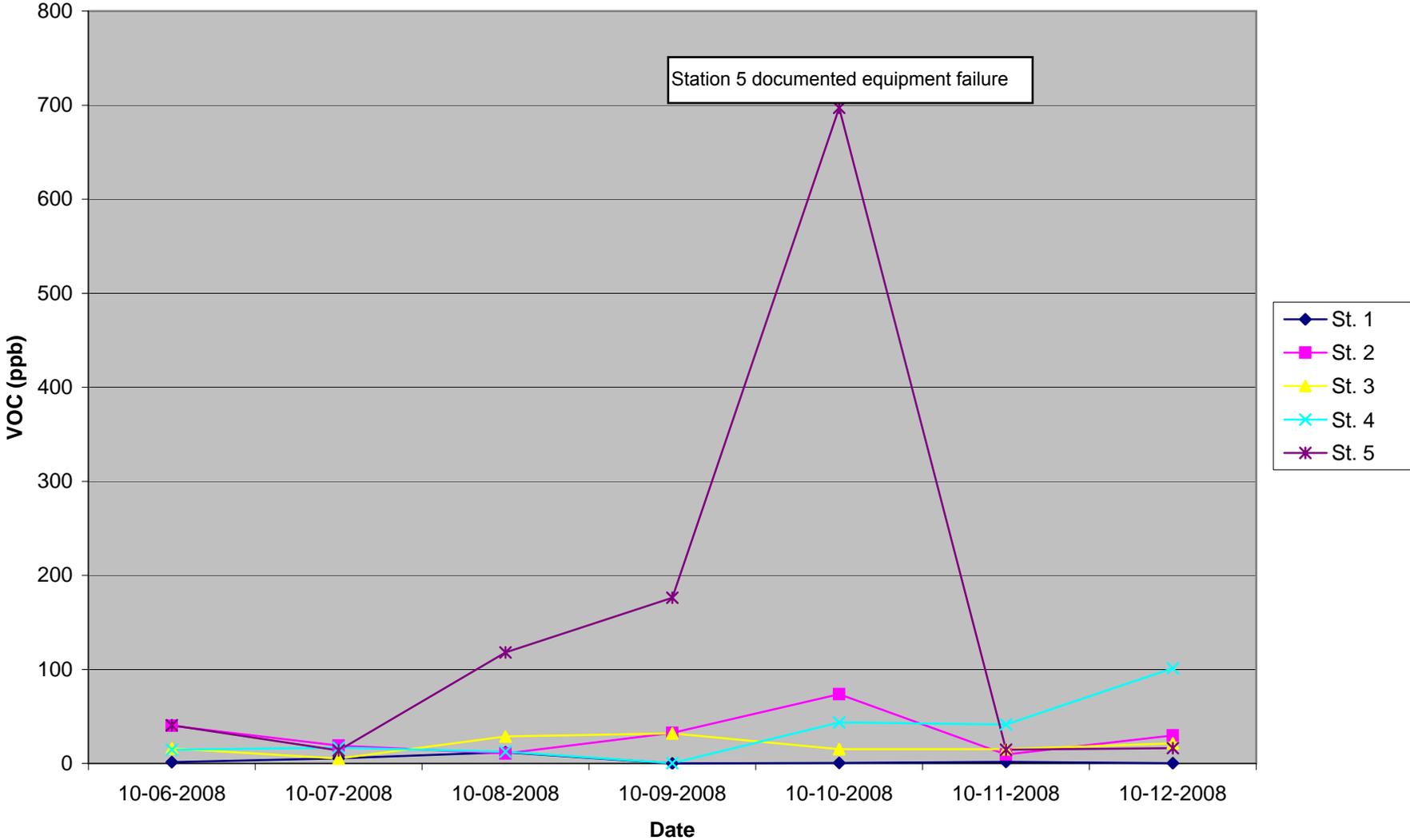
Stage B
24 Hour Average Weekly Summary



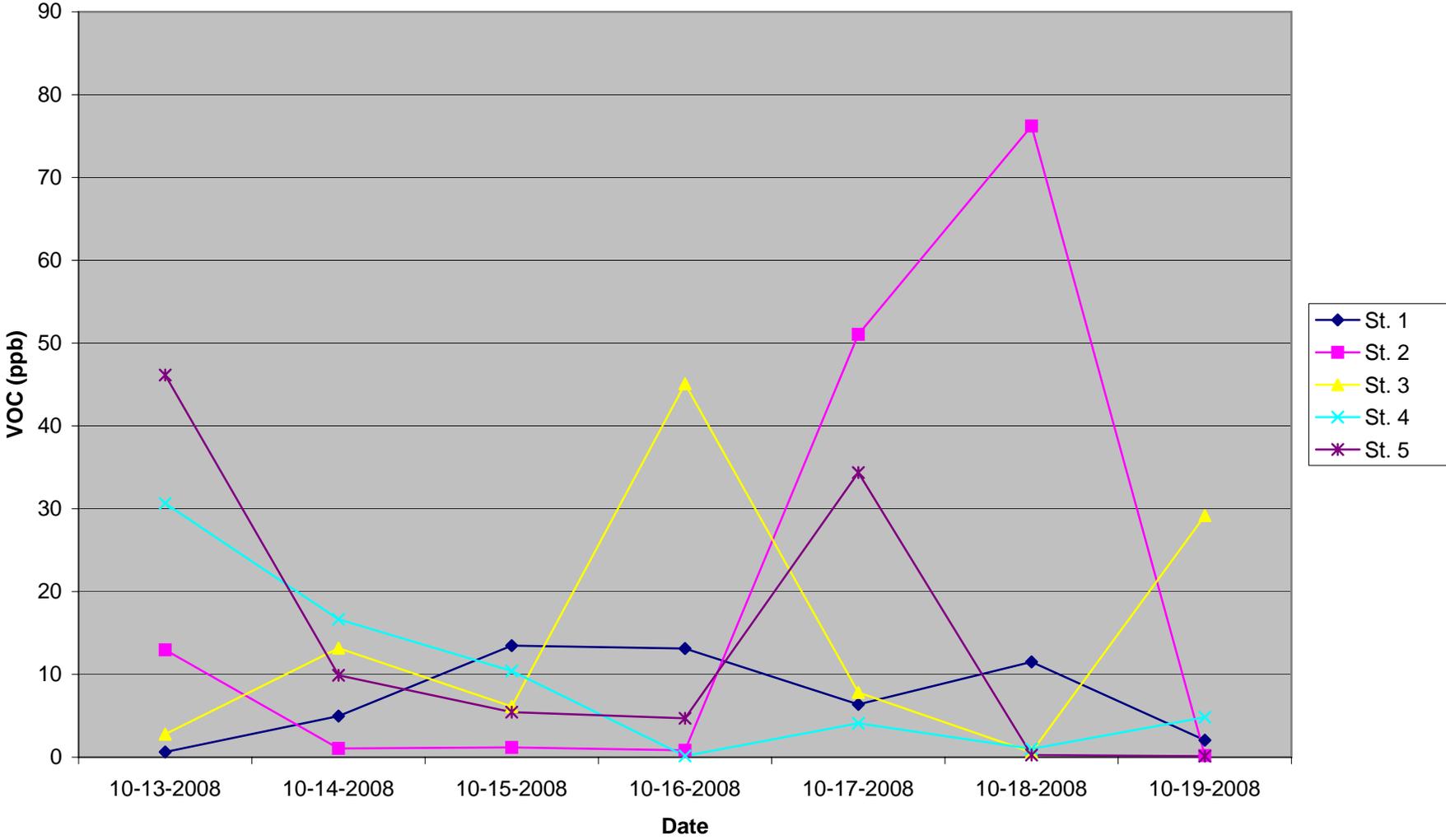
Stage B
24 Hour Average Weekly Summary



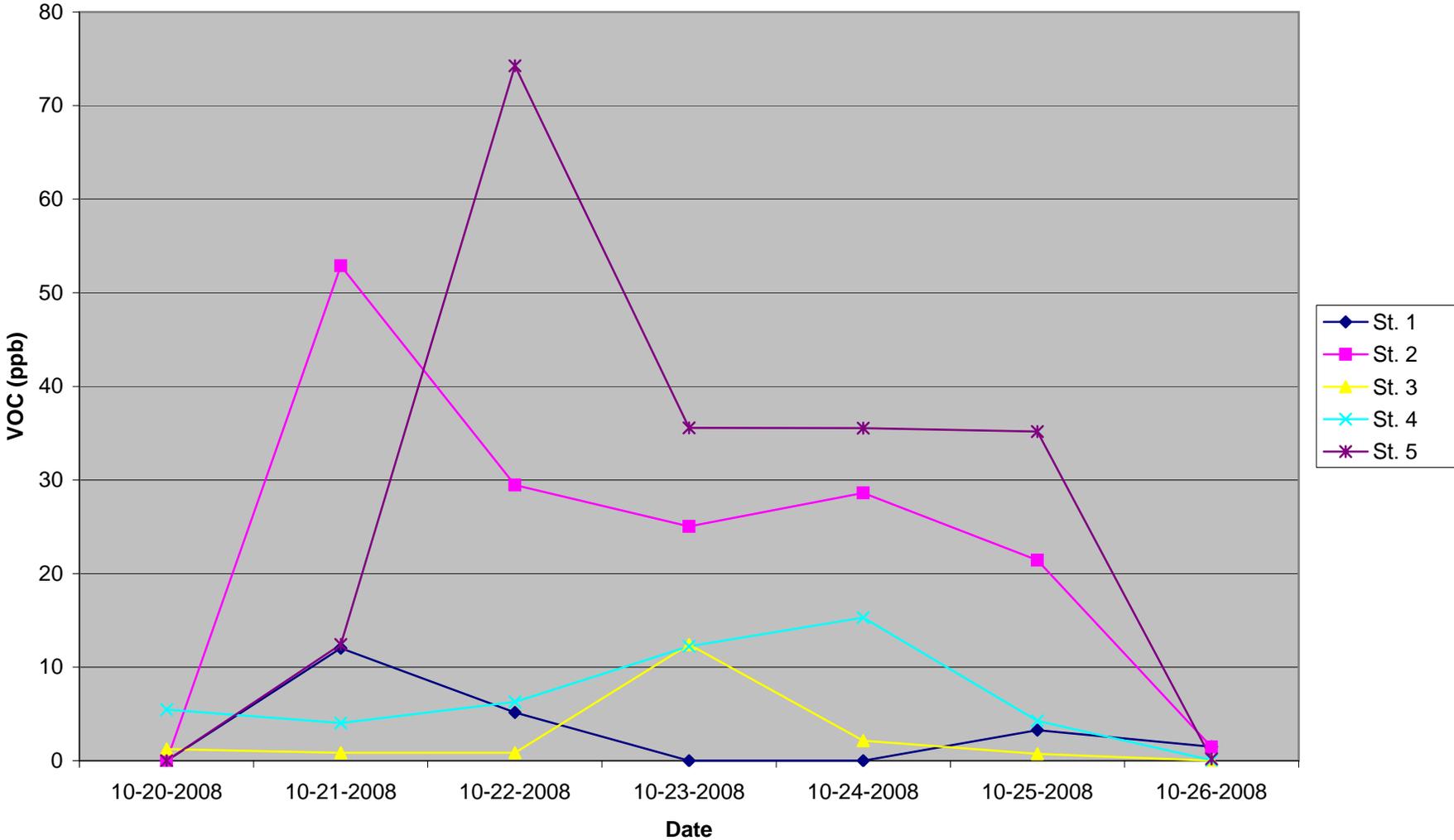
Stage B 24 Hour Average Weekly Summary



Stage B 24 Hour Average Weekly Summary



Stage B 24 Hour Average Weekly Summary



ATTACHMENT D
AERIAL INFRARED IMAGES

Composite Image by
Predictive Service LLC. 216.378.3500
Data Collected 8/19/2008



Composite Image by
Predictive Service LLC. 216.378.3500
Data Collected 10/24/2008

FLARE 4

AMBIENT TEMPERATURE WAS
43 DEG. F AT TIME OF IMAGE.



- 111.0
- 124.2
- 84.2
- 98.2
- 84.9
- 47.0
- 66.8
- 92.0
- 109.2
- 74.6
- 62.6
- 47.4
- 80.2
- 64.6