

Report of Progress, January 30, 2009

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Paragraph 15.a and b Enhanced Gas Extraction and Temperature Monitoring [NOTE: THIS WORK ITEM IS SUPERSEDED BY AN ISOLATION BREAK EXCAVATION].

Excavation of the Isolation Break continued through January. Excavation Deck 4 (of 8) is nearly finished meaning that about 270,000 cubic yards of the total planned 387,000 cubic yard excavation is complete. The daily production rate is starting to decrease due to longer vertical hauls and smaller working area. It is believed that the overall project completion milestone of late Spring is achievable. A drawing indicating the limit of work and progress is contained in Attachment A-1.

To date, no reaction-impacted waste or aluminum-containing waste has been encountered. Waste temperatures have generally been in the 90-120° F range with a maximum of 136° F. A table showing daily construction progress and parameters is included in the Isolation Break Excavation Summary provided in Attachment A-2.

The excavation is creating noticeable odors which are limited to active work hours and are completely eliminated by covering the work area at the end of each shift. Measurement and quantification of odors generated are discussed in a following section (Tier 5 – Odor Monitoring) of this report.

In situ temperature monitoring of the FBMP thermocouple monitors was continued throughout the month. Results are presented in Attachment A-3. No significant increasing or decreasing temperature trends are apparent with the exception of FBMP-1R, the maximum temperature for which increased by 20° F in December and another 25° F in January; since this probe is only about 100 feet from the top edge of the Isolation Break; it will be monitored closely during excavation.

Paragraph 15.c and f Capping and Stabilization.

A map depicting the current status of capping is included in Attachment B. During January, about 12,000 cubic yards of inert soil fill was strategically added to the “bowl” area to facilitate positive drainage. The drawing in Attachment B shows the limits of this filling operation. It is anticipated that this entire area will be overcapped with new temporary FML cap when weather conditions permit.

An updated “Operations and Maintenance Plan for Temporary Cap System” was submitted on January 19, 2009, incorporating agency comments. A joint Countywide-U.S. EPA-Ohio EPA walkover inspection will be conducted as soon as practical to determine the acceptability of the temporary capping.

Composite capping in the Cells 1-3 area is still on hold until U.S. EPA, Ohio EPA, and Countywide resolve details for a composite cap cross section.

Paragraph 15.e Air Monitoring and Sampling.

In accordance with the Isolation Break Excavation work plan, air monitoring was conducted during excavation activities. Each tier is discussed below with commentary on the results.

Tier 1 – Worker Monitoring. This utilizes PID (for total VOCs), 4-gas meter (for methane, carbon monoxide, oxygen, and hydrogen sulfide), ammonia meter, and benzene Drager tubes. A summary of PID results can be found on the Isolation Break Excavation Summary in Attachment A-2. No PID readings approached worker levels of concern and no ammonia or benzene was detected.

Tier 2 – Construction Zone Monitoring. Monitoring is conducted about 300 feet downwind of the excavation using a PID and, every third active excavation day, an 8-hour SUMMA canister (analyzed for volatile organics). A summary of PID results can be found on the Isolation Break Excavation Summary in Attachment A-2. No PID readings approached worker or community levels of concern. A table containing results of the SUMMA canister analyses is provided in Attachment C-1.

Tier 3 - “Stage C” Fixed Continuous Monitoring. Consists of the five continuous air monitors equipped with PIDs and automatically triggered 15-minute SUMMA canister collection. Until January 26, monitoring continued using the original “trigger” levels for collection of SUMMA canisters; starting January 27, the trigger levels were raised for 500 ppb for all Stage C monitors (with U.S. EPA concurrence). Results of monitoring for December 29, 2008 to January 29, 2009 are provided in Attachment C-2. Of the samples collected, no VOCs, including benzene, were detected at levels that exceed acute or chronic MRLs.

Tier 4 – Community Monitoring. This is comprised of the four off-site community air stations that have been monitored every six days for the past 21 months, and has now been temporarily increased to include sampling (VOCs only) every three days during Isolation Break work. The table provided in Attachment C-1 contains results for the VOC SUMMA canister analyses.

Tier 5 – Odor Monitoring. At least eight odor monitoring circuits are made around the public roads encircling the facility, resulting in about 184 readings per day. A Nasal Ranger reading of “4” is considered “distinct.” During excavation, almost all of the off-site detections of 4 or greater were attributable to the excavation activity. A summary of results, indicated as the number of occurrences at a level 4 or greater, can be found on the Isolation Break Excavation Summary in Attachment A-2.

Paragraph 15.g Aerial Infrared Imaging.

December 2008 and January 2009 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 December 2008 image was 20° F and during the January image was 0° F. Comparison of these images generally shows the same subcap warm areas attributed to subcap leachate outbreaks and transmittal of gas through subcap cracking with no large aerial changes or trends.

ATTACHMENT A-1

ISOLATION BREAK EXCAVATION PROGRESS

ATTACHMENT A-2

ISOLATION BREAK EXCAVATION SUMMARY
TABLE

Countywide RDF
Isolation Break Excavation Summary

Date	Day	Deck #	High Waste Temp (°F)	Aluminum Waste Encountered	Reaction Impacted Waste Encountered	Breathing/Work Zone (Tier 1) VOC Data (ppb) High/Avg.	300' Downwind (Tier 2) VOC Data (ppb) High (1 min. avg.)/Avg.	Nasal Ranger Daily Readings ≥ 4
12/8/2008	Monday	1	80	No	No	600/200	58/2.5	0
12/9/2008	Tuesday	1	107	No	No	500/100	128/1	1
12/10/2008	Wednesday	1	109	No	No	900/500	35/0.5	3
12/11/2008	Thursday	1	123	No	No	2,800/1,600	2/0	4
12/12/2008	Friday	1	108	No	No	1,400/850	166/9	3
12/13/2008	Saturday							
12/14/2008	Sunday							
12/15/2008	Monday	1	110	No	No	800/200	191/9	2
12/16/2008	Tuesday	1	113	No	No	800/100	177/9	6
12/17/2008	Wednesday	1/2	120	No	No	500/82	2/0	3
12/18/2008	Thursday	2	128	No	No	900/141	65/0	2
12/19/2008	Friday	2	118	No	No	0/0	361/50	4
12/20/2008	Saturday	2	125	No	No	900/361	372/60	0
12/21/2008	Sunday							
12/22/2008	Monday							
12/23/2008	Tuesday							
12/24/2008	Wednesday							
12/25/2008	Thursday							
12/26/2008	Friday							
12/27/2008	Saturday							
12/28/2008	Sunday							
12/29/2008	Monday							
12/30/2008	Tuesday							
12/31/2008	Wednesday							
1/1/2009	Thursday							
1/2/2009	Friday							
1/3/2009	Saturday							
1/4/2009	Sunday							
1/5/2009	Monday	2	128	No	No	1,600/317	74/2	0
1/6/2009	Tuesday	2	106	No	No	300/100	554/128	3
1/7/2009	Wednesday							
1/8/2009	Thursday	2	109	No	No	5,600/615	306/19	4
1/9/2009	Friday	2	102	No	No	800/395	216/5	3
1/10/2009	Saturday							

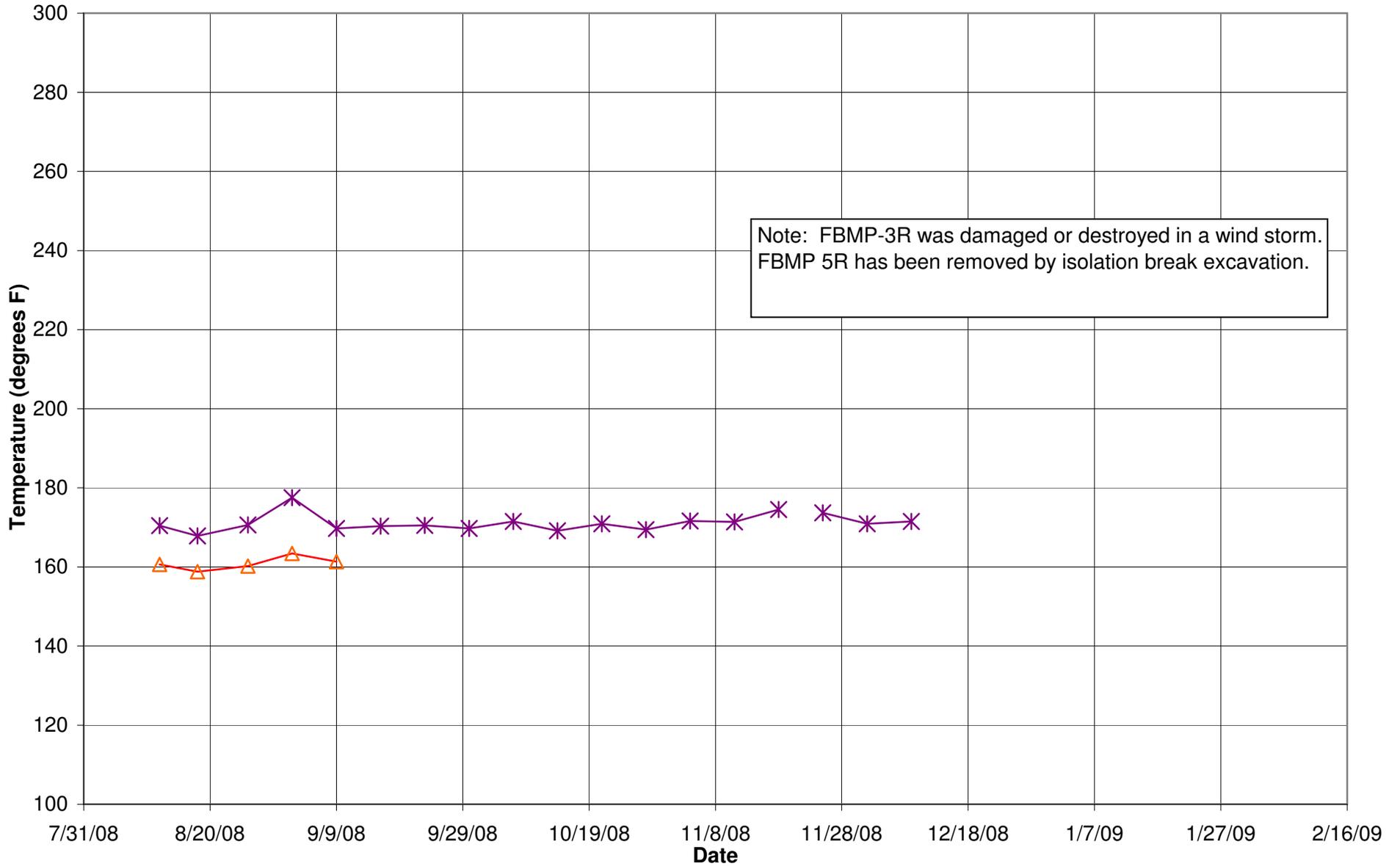
Countywide RDF
Isolation Break Excavation Summary

1/11/2009	Sunday							
1/12/2009	Monday	3	100	No	No	600/65	17/0	1
1/13/2009	Tuesday	3	115	No	No	5,000/835	162/15	4
1/14/2009	Wednesday	3	120	No	No	300/50	122/4	2
1/15/2009	Thursday	3	115	No	No	5,100/755	43/0	3
1/16/2009	Friday	3	106	No	No	900/400	103/16	4
1/17/2009	Saturday							
1/18/2009	Sunday							
1/19/2009	Monday	3	118	No	No	5,800/1,061	322/27	3
1/20/2009	Tuesday	3	117	No	No	900/435	472/48	0
1/21/2009	Wednesday	3/4	113	No	No	800/235	189/57	3
1/22/2009	Thursday	4	136	No	No	600/350	100/2	5
1/23/2009	Friday	4	135	No	No	5,600/880	714/84	3
1/24/2009	Saturday							
1/25/2009	Sunday							
1/26/2009	Monday	4	128	No	No	800/369	649/122	5
1/27/2009	Tuesday	4	132	No	No	800/447	728/119	3
1/28/2009	Wednesday							
1/29/2009	Thursday	4	124	N	N	800/281	11/0	3
1/30/2009	Friday							
1/31/2009	Saturday							

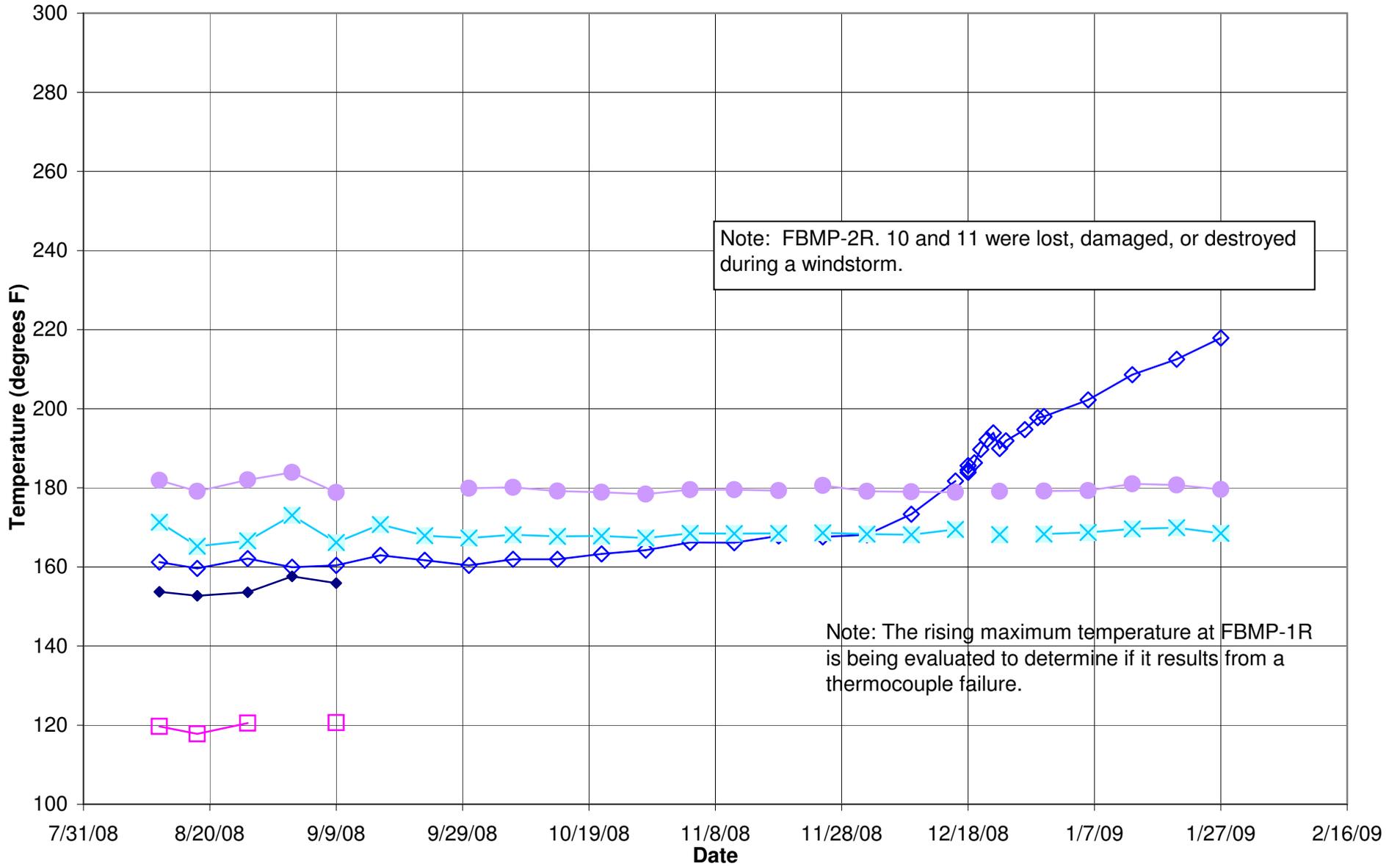
ATTACHMENT A-3

FBMP TEMPERATURE PROBE GRAPHS

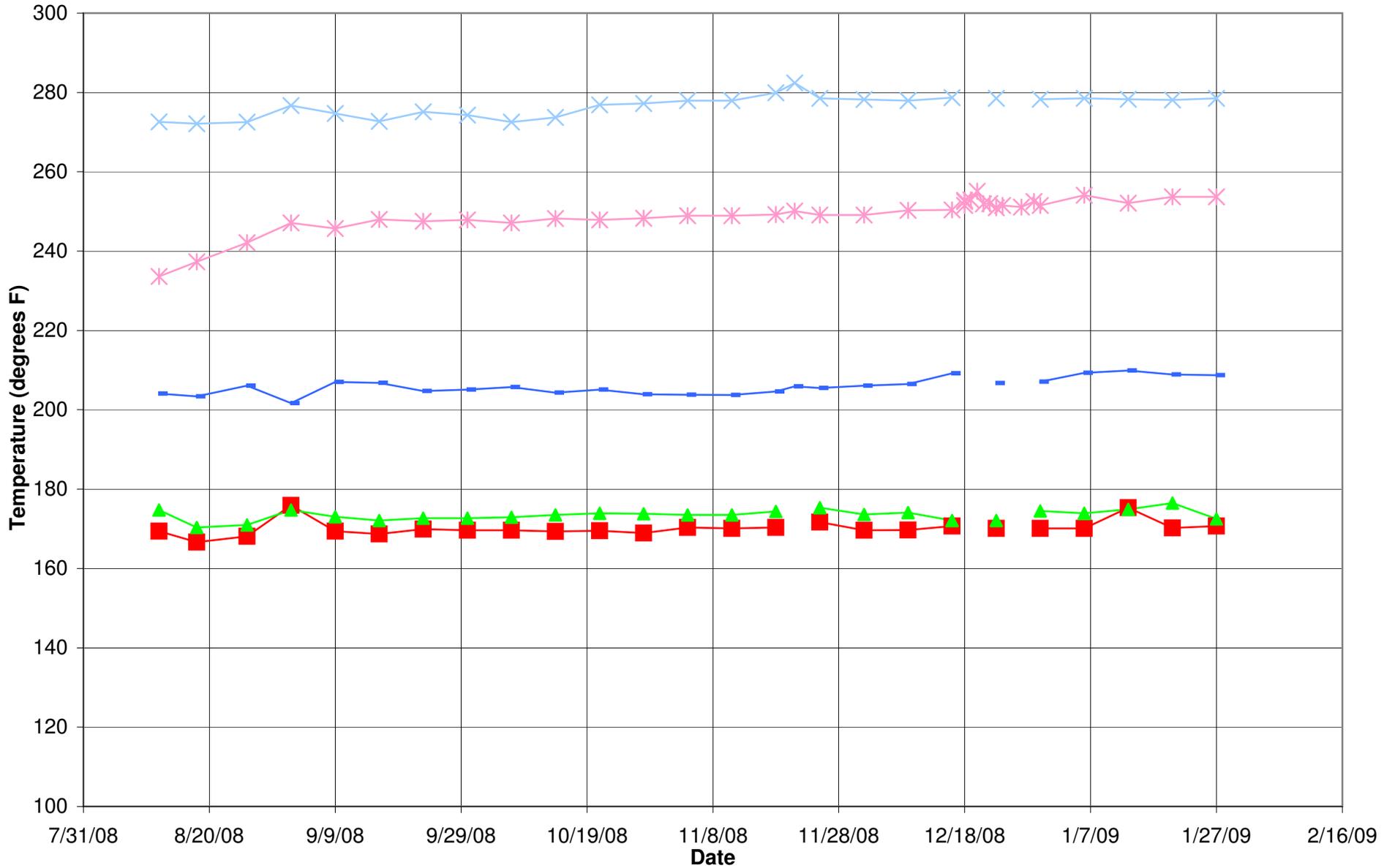
In-situ Temperatures - FBMPs within the Isolation Break Excavation Maximum Readings per Date per FBMP Boring



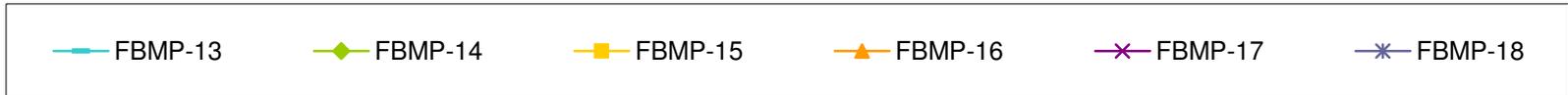
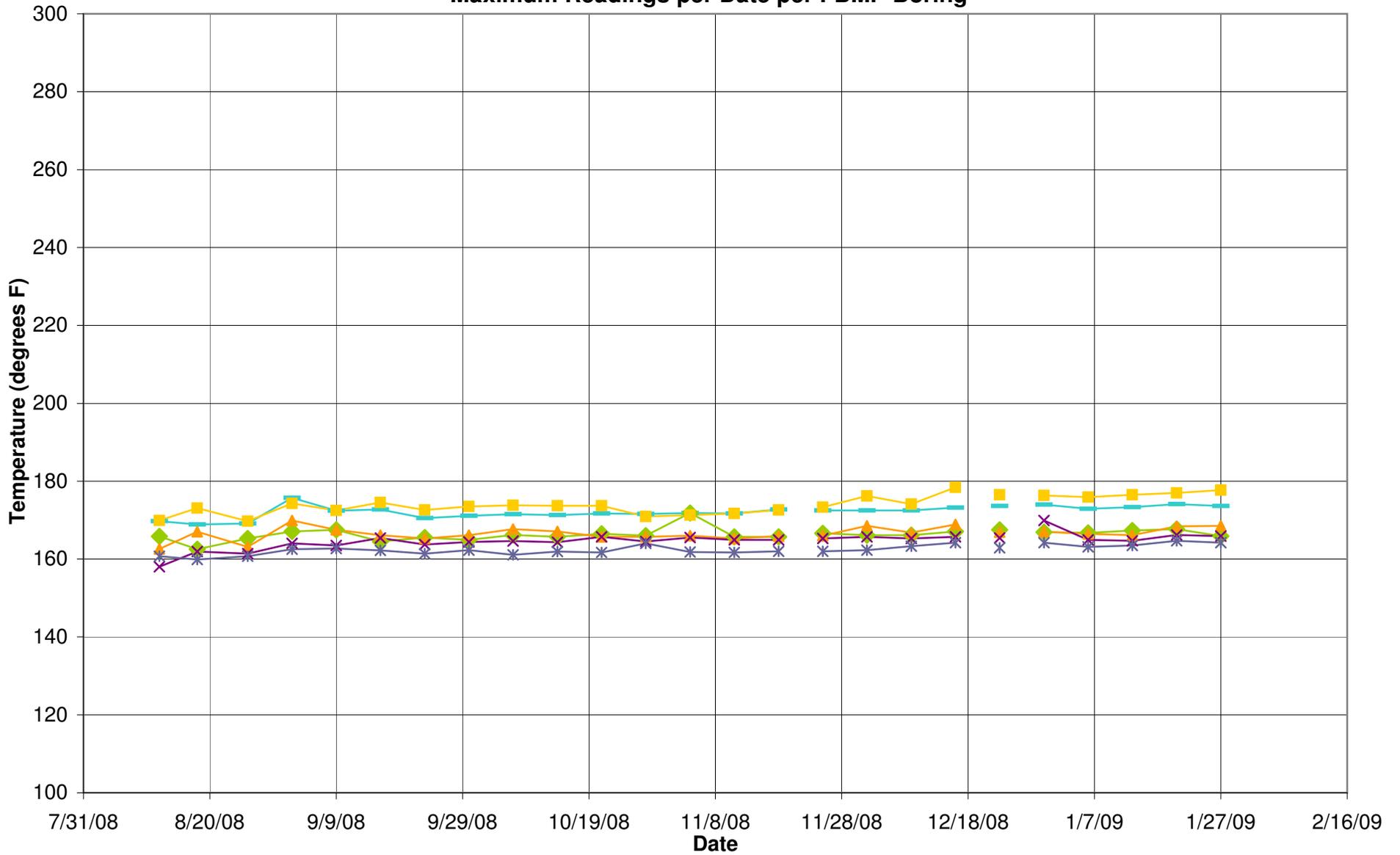
In-situ Temperatures - FBMPs within 150 ft of the Isolation Break Excavation Maximum Readings per Date per FBMP Boring



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



LEGEND

- PROPERTY LINE
- LIMIT OF SOLID WASTE
- CELL BOUNDARY
- EXISTING 2' CONTOURS
- EXISTING 10' CONTOURS
- CAP AREA BOUNDARY
- EXISTING PARKING
- EXISTING GRAVEL ROAD
- PROPOSED AREA TO RECEIVE COMPOSITE COVER
- EXISTING TEMPORARY FML CAP
- PROPOSED TEMPORARY EXPOSED FML CAP
- AREA TO BE PREPARED FOR CONSTRUCTION OF TEMPORARY FML CAP
- EXISTING TEMPORARY FML CAP TO BE AUGMENTED

NOTES:

1. EXISTING CONTOURS WERE COMPILED FROM DIVERSIFIED ENGINEERING, INC. TOPOGRAPHICAL SURVEY DATED 12/05/07 AND 04/28/08.
2. AREAS SHOWN ARE APPROXIMATE.
3. THE EXISTING TEMPORARY CAP WILL BE MAINTAINED.
4. LOCATION OF NORTHWEST CAP LIMIT WAS OBTAINED FROM FIGURE 3 (GAS WELL AND TEMPERATURE MONITORING LOCATION MAP DATED 04/28/08) PROVIDED IN THE GAS EXTRACTION AND MONITORING WORK PLAN DATED MAY 27, 2008.

11 Acres Placed in September 2008

5.5 Acres Placed in September 2008

3.5 Acres Placed in September 2008

3.25 Acres Completed in October 2008

8.5 Acres FML Placed in August 2008

7 Acres FML Placed in August 2008

Approx. 12,000 CY soil fill added to achieve positive drainage in the "bowl" area in January 2009

ANNOTATIONS IN RED FONT PRESENT CAPPING CONSTRUCTION ACTIVITIES COMPLETED AS OF JANUARY 2009. NEW TEMPORARY FML CAP IS COMPLETE.

1" = 1/2" @ 0"

REV	DATE	DESCRIPTION	DWN BY	DES BY	CHK BY	APP BY
1	06/24/08	REVISED PER US EPA 06/06/08 COMMENTS	JAW	JGW	BOS	JGW
		DATE OF ISSUE	DRAWN BY	CHECKED BY	DATE OF ISSUE	DESIGNED BY
		05/12/08	JAW	JCO		JGW



REPUBLIC SERVICES OF OHIO II, LLC
 COUNTYWIDE RECYCLING & DISPOSAL FACILITY
 STARK COUNTY, EAST SPARTA, OHIO
LANDFILL COVER & LONG TERM CAPPING
 PROPOSED AREAS FOR 2008 CAP CONSTRUCTION

SHEET NO.
3
 PROJECT NO.
 070187

ATTACHMENT C-1

TIER 2 AND TIER 4 VOC SUMMA CANISTER
ANALYTICAL RESULTS

ATTACHMENT C-2

TIER 3 (Stage C) AIR MONITORING RESULTS

The Stage C ambient air monitoring program has continuously collected real-time Volatile Organic Compounds (VOC) and weather data 24 hours per day since October 2, 2008. Over 898,000 VOC readings have been collected at the perimeter of the landfill during this monitoring period.

Trigger Levels

On January 27, 2009, the Center for Toxicology and Environmental Health (CTEH®), United States Environmental Protection Agency (USEPA) and Agency for Toxic Substances and Disease Registry (ATSDR) adjusted the trigger levels for the collection of SUMMA canister laboratory samples. A VOC concentration at or above 0.50 ppm for each station was chosen as the trigger level. Table 1.0 illustrates the trigger levels for each station.

Table 1.0
January 27, 2009 Selected Trigger Levels

Station	Trigger Level (ppm)
1	0.50
2	0.50
3	0.50
4	0.50
5	0.50

If a trigger level is exceeded for a five minute consecutive monitoring period, a 15 minute integrated SUMMA canister is automatically collected. Trigger levels will be continue to be re evaluated monthly or as needed based on VOC concentrations collected at each station. As of January 27, 2009, the updated trigger levels are currently being used to trigger the collection of a SUMMA cannister.

Real-Time Results

During the December 29, 2008 through January 29, 2009 monitoring period, approximately 198,144 real-time VOC readings have been collected at the perimeter of the landfill. Of these readings, the sustained VOC concentration exceeded the established trigger levels seven times. The mean VOC concentrations collected at the perimeter of the landfill ranged from 0.01 ppm to 0.07 ppm. Table 2.0 summarizes the Real-time data collected from December 29, 2008 through January 29, 2009.

Table 2.0 December 29, through January 29, Real Time Data Summary

Station	Analyte	Total VOC Readings Recorded	Trigger Level	Triggering events	Average Concentration
1	VOC	30,359	0.50	1	0.01 ppm
2	VOC	39,036	0.18	0	0.07 ppm
3	VOC	40,272	0.13	0	0.01 ppm
4	VOC	43,757	0.10	2	0.04 ppm
5	VOC	44,720	0.17	4	0.05 ppm

A graphical representation of 24 hour average Real-time concentrations can be viewed in Attachment A.

Summa Results

A total of seven SUMMA samples have been collected since December 29, 2008. Of these seven samples, station-specific weather data indicate that four of the samples were downwind of the excavation area when the samples were collected. (Attachment B). SUMMA samples were analyzed for VOCs using GC/MS by EPA TO-15 plus TICs. Sample results indicate VOC levels that are consistent with background levels of VOCs in suburban environments or that are typical of air in analytical laboratories. Of the seven samples collected, no VOCs, including benzene, were detected at levels that exceeded the ATSDR's acute or chronic Minimal Risk Levels (MRLs). These data to date indicate that landfill emissions from the site under current conditions do not pose a risk to human health in the short or long term.

Attachment A

Custom Date Report

Start Date

End Date

2008/12/29

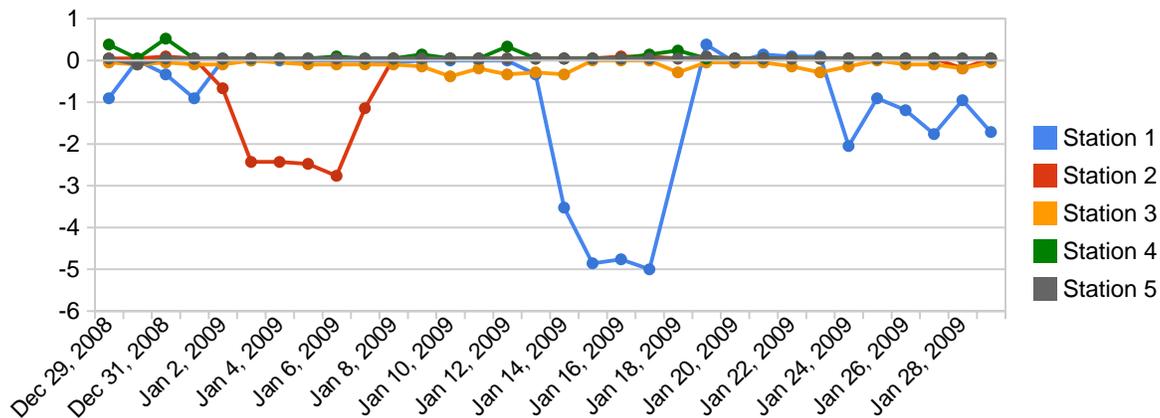
Calendar

2009/01/29

Calendar

Save

24 Hour Average PID Concentration (ppm)



<u>Day</u>	<u>Station 1 (PID)</u>	<u>Station 2 (PID)</u>	<u>Station 3 (PID)</u>	<u>Station 4 (PID)</u>	<u>Station 5 (PID)</u>
2008-12-29	-0.92	0.07	-0.04	0.39	0.05
2008-12-30	-0.00	0.07	-0.08	0.04	-0.11
2008-12-31	-0.33	0.07	-0.03	0.52	0.05
2009-01-01	-0.90	0.07	-0.07	0.04	0.05
2009-01-02	-0.01	-0.64	-0.08	0.04	0.05
2009-01-03	-0.02	-2.45	-0.02	0.04	0.05
2009-01-04	-0.00	-2.45		0.04	0.05
2009-01-05	-0.01	-2.45	-0.08	0.04	0.06
2009-01-06	-0.01	-2.76	-0.12	0.11	0.05
2009-01-07	-0.01	-1.14	-0.11	0.06	0.05
2009-01-08	-0.07	0.06	-0.08	0.05	0.06
2009-01-09	-0.01	0.07	-0.15	0.14	0.05
2009-01-10	-0.01	0.05	-0.37	0.03	0.05
2009-01-11	-0.02	0.06	-0.21	0.04	0.05
2009-01-12	-0.02	0.07	-0.32	0.33	0.05
2009-01-13	-0.32	0.06	-0.28	0.04	0.05
2009-01-14	-3.53	0.07	-0.33	0.06	0.05
2009-01-15	-4.84	0.07	-0.01	0.05	0.05
2009-01-16	-4.77	0.08	0.00	0.06	0.05

2009-01-17	-5.00	0.07	-0.01	0.16	0.04
2009-01-18		0.06	-0.28	0.23	0.05
2009-01-19	0.38	0.07	-0.06	0.05	0.08
2009-01-20	-0.06	0.07	-0.06	0.05	0.05
2009-01-21	0.14	0.07	-0.04	0.05	0.05
2009-01-22	0.08	0.06	-0.13	0.04	0.05
2009-01-23	0.10	0.06	-0.31	0.04	0.05
2009-01-24	-2.06	0.06	-0.12	0.04	0.05
2009-01-25	-0.88	0.07	-0.02	0.05	0.05
2009-01-26	-1.17	0.07	-0.10	0.05	0.05
2009-01-27	-1.74	0.06	-0.09	0.04	0.05
2009-01-28	-0.96	-0.21	-0.21	0.04	0.05
2009-01-29	-1.72	0.06	-0.05	0.04	0.05

Attachment B

Stage C Integrated Air Sampling Summary

Sample ID	Set out Date	Location	Trigger Level	Trigger Date/Time	Wind Direction	Downwind of Reaction Area	Results	Average 15 min PID Reading During Sample	TICS Identified/ Sampling Methods	Ambient Sampling Temp (Celsius)
ESOH1108-1-SC001	11/8/2008	Station 1	0.50 ppm	11/12/2008 22:52	134	NO	ESOH1108-1-SC001	0.58	None	
ESOH1108-2-SC002	11/8/2008	Station 2	0.18 ppm	11/10/2008 4:38	266	YES	ESOH1101-2-SC002	-0.50	Hexafluoropropylene	7.8
ESOH1108-3-SC003	11/8/2008	Station 3	Sample Fault-Calibration gas triggered the Summa collection system							
ESOH1108-5-SC004	11/8/2008	Station 5	0.17 ppm	12/20/2008 3:53	12	NO	ESOH1108-5-SC004	22.52*	Ethane, 1,1 difluoro; Ethylene Oxide; Isopropyl Alcohol; Propane; 1,1,1,3,3,3-hexafluoro-2-triflu; Propene, hexafluoro	7.8
ESOH1110-2-SC005	11/10/2008	Station 2	0.18 ppm	11/10/2008 20:15	338	YES	ESOH1110-2-SC005	0.17	unknown	-0.2
ESOH1111-2-SC006	11/11/2008	Station 2	Sample Fault Calibration gas triggered the Summa collection system							
ESOH1111-4-SC007	11/11/2008	Station 4	0.10 ppm	11/23/2008 14:06	227	NO	ESOH1111-4-SC007	0.09	Isopropyl alcohol; Propene, Hexafluoro-; Unknown	2.3
ESOH1113-1-SC008	11/13/2008	Station 1	0.50 ppm	11/13/2008 21:02	181	NO	ESOH1113-1-SC008	0.60	Ethyl alcohol; Propene, hexafluoro; Unknown	10.8
ESOH1114-1-SC009	11/11/2008	Station 1	0.50 ppm	11/24/2008 15:13	179	NO	ESOH1114-1-SC009	0.53	Methyl alcohol.; Propene, hexafluoro	4.6
ESOH1119-3-SC010	11/19/2008	Station 3	Sample Fault- Leaking SUMMA Cannister							
ESOH1123-3-SC011	11/23/2008	Station 3	0.13 ppm	11/29/2008 3:06	290	Downwind of Working phase	ESOH1123-3-SC011	0.04	Butane; Butane, 2 methyl-; Disulfide, dimethyl; Ethane, 1-chloro-1,1-difluoro-; Ethyl alcohol; Isobutane; Pentane; Pentane, 2-methyl-; Propane; Propene, hexafluoro-	-1.6
ESOH1124-4-SC012	11/24/2008	Station 4	0.10 ppm	11/24/2008 14:23	226	NO	ESOH1124-4-SC012	0.10	None	4.1
ESOH1124-4-SC013	11/24/2008	Station 4	Sample Fault-Calibration gas triggered the Summa collection system							
ESOH1124-1-SC014	11/24/2008	Station 1	0.50 ppm							
ESOH1126-4-SC015	11/26/2008	Station 4	0.10 ppm	11/29/2008 11:51	192	NO	ESOH1126-4-SC015	0.10	Ethyl alcohol;Methyl Alcohol; Propene, hexafluoro-	2.7
ESOH1129-3-SC016	11/29/2008	Station 3	Sample Fault							
ESOH1129-4-SC017	11/24/2008	Station 4	Sample Fault							
ESOH1202-4-SC018	12/2/2008	Station 4	0.10 ppm	12/3/2008 8:28	195	NO	ESOH1202-4-SC018	0.10	None	-2.0
ESOH1203-4-SC019	12/3/2008		Sample Fault due to PID malfunction							
ESOH1205-4-SC020	12/5/2008	Station 4	Sample Fault							
ESOH1208-4-SC021	12/8/2008	Station 4	0.10 ppm	12/21/2008 5:52	292	NO	ESOH1208-4-SC021	0.26	Acetaldehyde; Butane, 2-methyl-; Pentane; Propene, hexafluoro-	-1.3
ESOH1218-3-SC022	12/18/2008	Station 3	Sample Fault- Leaking SUMMA Cannister							
ESOH1220-5-SC023	12/20/2008	Station 5	Sample Fault- Leaking SUMMA Cannister							

Stage C Integrated Air Sampling Summary

Sample ID	Set out Date	Location	Trigger Level	Trigger Date/Time	Wind Direction	Downwind of Reaction Area	Results	Average 15 min PID Reading During Sample	TICS Identified/ Sampling Methods	Ambient Sampling Temp (Celsius)
ESOH1222-4-SC024	12/22/2008	Station 4	0.10 ppm	1/6/2009 0:02	110	Yes	ESOH1222-4-SC024	0.06	Butane; Butane, 2-methyl-; Dimethyl ether; Ethyl alcohol; Hexane,3-methyl-; Hydroxylamine, O-methyl; Pentane; Pentane, 2-methyl-; Propene, hexafluoro-, 1-propene, 2-methyl-	-3.6
ESOH1230-5-SC025	12/30/2008	Station 5	0.17 ppm	1/8/2009 10:59	243	Yes	ESOH1230-5-SC025	0.16	Butanoic acid, ethyl ester; Ethane, 1,1 -difluoro-; Ethyl alcohol; Isopropyl Alcohol; Methyl Alcohol; Propene, hexafluoro-; 1-Propanol; 2-Butanol, (R-)	-7.0
ESOH0106-4-SC026	1/6/2009	Station 4	0.10 ppm	1/7/2008 20:11	258	No	ESOH0106-4-SC026	0.10	Butane; Butane, 2-methyl-; Ethane, 1,1-difluoro-; Pentafluoropropionamide; Pentane	-2.2
ESOH0107-2-SC027	1/7/2009	Station 2	0.18 ppm	Current Sample						
ESOH0108-4-SC028	1/8/2009	Station 4	0.10 ppm	Current Sample						
ESOH0108-5-SC029	1/8/2009	Station 5	0.17 ppm	1/19/2009 0:32	215	Yes	ESOH0108-5-SC029	0.26	Ethyl alcohol; Furan; Propene	-11.70
ESOH0108-3-SC030	1/8/2009	Station 3	0.13 ppm	Current Sample						
ESOH0119-5-SC031	1/19/2009	Station 5	0.13 ppm	1/19/2009 13:22	267	Yes	ESOH0119-5-SC031	0.17	Ethyl alcohol; Isopropyl Alcohol; Methyl Alcohol; 1-Butanol; 1-Propanol; 2-Butanol;	-9.30
ESOH0119-5-SC032	1/19/2009	Station 5	0.13 ppm	1/26/2009 9:21	220	Yes		0.18		-12.6
ESOH0119-1-SC033	1/19/2009	Station 1	0.50 ppm	Current Sample						
ESOH0119-5-SC034	1/19/2009	Station 5	0.50 ppm	Current Sample						

Current Sample- Sample that is at the station and ready to be collected

Pending- Sample has been collected awaiting results from the laboratory

Average PID Reading During Sample- Average PID concentration during the SUMMA can sample collection

* Potential RAEGuard PID error

Station 4 Trigger Change to 0.15 ppm on January 13, 2008

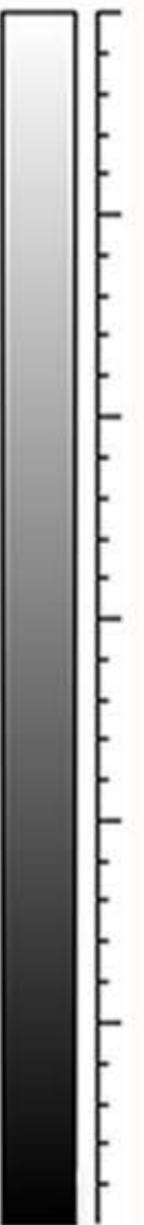
Stations 1 through 5 have been changed to 0.50 ppm on January 27, 2008

ATTACHMENT D
AERIAL INFRARED IMAGES

AREA APPEARED TO HAVE
INCREASED IN NOVEMBER HAS
STAYED CONSISTENT BETWEEN THE
NOVEMBER AND DECEMBER IMAGES



AMBIENT TEMPERATURE WAS
20 DEG. F AT TIME OF IMAGE



Composite Image by
Predictive Service LLC. 216.378.3500
Data Collected 1/21/2009



AMBIENT
TEMPERATURE
WAS 0 DEG. F AT
TIME OF IMAGE

