



**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY**
REGION 5
CLEVELAND OFFICE
25089 CENTER RIDGE ROAD
WESTLAKE, OH 44145-4170

October 24, 2008

Republic Services of Ohio II, LLC
c/o Michael Beaudoin
3619 Gracemont Street S.W.
East Sparta, Ohio 44626

Re: U.S. EPA Request for Isolation Break Work Plan under Settlement Agreement No. V-W-08-C-897, for the Countywide Recycling and Disposal Facility, East Sparta, Ohio (Site ID# B5FC)

Dear Mr. Beaudoin:

Pursuant to the authority vested in the On-Scene Coordinator (OSC) by the National Contingency Plan (NCP) and by Section XIV., paragraph 36 of the above-referenced Settlement Agreement, the United States Environmental Protection Agency (U.S. EPA) is formally requesting that Republic Services of Ohio II, LLC ("Republic") submit a work plan to construct a physical isolation break between Cells 5A/5B/4B and Cell 7 of the Countywide Recycling and Disposal Facility.

The purpose of the isolation break is to achieve a complete separation and full containment and isolation of the ongoing reaction currently affecting Cells 1-6. It is the understanding of U.S. EPA that Republic recently completed an "Isolation Break Investigation" into the feasibility of construction, which concluded that an isolation break could be constructed in a safe manner without significant impact on the community. Pending U.S. EPA's review of Republic's investigation report, and given the data recently collected by temperature probes in the Cell 5/7 border area, U.S. EPA's position is that the construction of a physical isolation break between Cells 5A/5B/4B and Cell 7 is additional Work, as defined by the Settlement Agreement and consistent with the NCP.

The following criteria should be taken into consideration in the development of the work plan:

- Control of odors which may affect the community,
- Safe and effective management of any leachate generated,
- Monitoring and control of emissions which may impact workers, and
- Prevention and control of conditions which may lead to a fire.

It is U.S. EPA's expectation that the work plan will address all pertinent aspects of the design, construction, environmental controls, waste relocation, compliance issues, and any contingencies associated with the isolation break.

Prior to formal submission of a work plan pursuant to this request, U.S. EPA, in conjunction with Republic, will schedule a meeting with representatives of the Ohio EPA, Stark County Health Department and Canton City Health Department to review a conceptual work plan and ensure that it takes into consideration all applicable or relevant and appropriate requirements (ARARs). It is U.S. EPA's expectation that, to the extent feasible, all ARARs will be adhered to in the design, construction, and completion of the isolation break.

Please notify me of the availability of the conceptual work plan as soon as possible. You may post the document and any related attachments or appendices to the Site's FTP site for review prior to the meeting.

Thank you very much for your cooperation and desire to see the isolation break initiated and concluded as safely and expeditiously as possible. If you have any questions, please feel free to contact me at (440) 250-1742.

Sincerely,

A handwritten signature in black ink, appearing to read "James E. Augustyn", with a horizontal line extending to the right. Below the signature, the letters "FOR" are handwritten in a smaller, stylized font.

James E. Augustyn
On-Scene Coordinator

cc: Ed Gortner, Ohio EPA, Columbus, OH
James Morris, USEPA, Reg. V, ORC
Paul Ruesch, USEPA, Reg. V, LCD
Michelle Colledge, ATSDR
Records Center, USEPA, Reg. V