



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769  
www.epa.state.oh.us

Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korleski, Director

February 11, 2010

RE: NOTICE OF VIOLATION  
GROUND WATER  
A&L SALVAGE, LLC C&DD LANDFILL  
COLUMBIANA COUNTY

**CERTIFIED MAIL**

Mr. Steven Callahan  
A&L Salvage, LLC  
11225 SR 45  
P. O. Box 333  
Lisbon, Ohio 44432

Dear Mr. Callahan:

The Ohio Environmental Protection Agency (Ohio EPA) has completed its review of the document, "Semi-Annual Monitoring Report, DFFO Area – September 10, 2009, A&L Salvage C&DD Landfill, Columbiana County, Ohio", dated November 24, 2009. The document was prepared for A&L Salvage, LLC (A&L) by Key Environmental Incorporated of Carnegie, Pennsylvania, and it was received by Ohio EPA on November 25, 2009.

The implementation of the Ground Water Detection Monitoring Plan (GWDMP) for A&L is a result of Director's Final Findings and Orders (DFF&Os) dated March 1, 2005. The DFF&Os require A&L to implement a GWDMP that meets the requirements of Ohio Administrative Code (OAC) 3745-27-10, as effective August 15, 2003.

Upon completing a review of the subject document listed above, Ohio EPA documented the following violations:

1. **Submission of Results.** The semi-annual ground water report was received by Ohio EPA on November 25, 2009. The sampling event took place on September 10, 2009. The data was not received by Ohio EPA within 75 days of its collection. As a result, the owner or operator did not meet the requirements of OAC Rule 3745-27-10(C)(10) for the sampling event and is in violation of the following:
  - a. **OAC Rule 3745-27-10(C)(10):** *"The owner or operator shall comply with the following requirements regarding ground water sampling, analysis, and statistical methods...All ground water elevation, sample analysis and statistical analysis results generated in accordance with paragraphs (B), (C), (D), (E), and (F) of this rule shall be submitted to Ohio EPA not later than seventy-five days after sampling the well."*



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The owner or operator should ensure that future reports of ground water quality are submitted within the required time frame.

2. **Submission of Results.** The semi-annual ground water report does not contain field data sheets. Without these, Ohio EPA cannot confirm such things as purge/sample techniques, purge time, field measurements, purge volume, time of sampling, etc. As a result, the owner or operator is in violation of the following:

- a. **OAC Rule 3745-27-10(C)(10)(b):** *“The owner or operator shall comply with the following requirements regarding ground water elevation, sample analysis and statistical analysis results generated in accordance with paragraphs (B), (C), (D), (E) and (F) of this rule shall be submitted to Ohio EPA not later than seventy-five days after sampling the well. All ground water data and an accompanying text shall be submitted to Ohio EPA in a form specified by the director or his authorized representative...The accompanying text shall consist of, at a minimum, the following...Field and laboratory quality assurance/quality control (QA/QC) data.”*

The owner or operator must provide copies of the field data forms for this sampling event to Ohio EPA and ensure that future reports contain all data generated in association with the sampling event, as required by OAC Rule 3745-27-10(C)(10).

In addition to the above violations, the following observations were made:

1. The section on page two of the report, titled “Closing”, indicates that the next sampling event will take place in December 2009. It is unclear why these wells would be sampled so soon when they are required only to be monitored semi-annually. If the sampling event is in reference to the OAC Rule 3745-400-10 ground water monitoring program, the text report should be revised to clearly indicate that. Otherwise, the owner or operator should provide an explanation.
2. Based on both statistical and non-statistical reviews of the data, there does not appear to be an impact on the ground water quality from the Active Licensed Disposal Area of the landfill. The owner or operator should continue with detection monitoring.

In conclusion, the owner or operator should revise the report as necessary and submit it to Ohio EPA within 30 days of receipt of this letter.

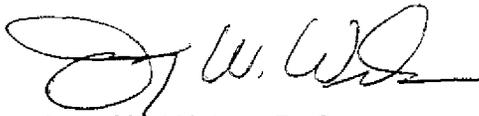
Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the owner or operator of A&L Salvage, LLC, or others, from responsibility under

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Chapters 3704., 3714., 3734., or 6111. of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts remedying conditions resulting from any release of contaminants to the environment.

If you have any technical questions regarding this review, please contact Russ Kocher at (330) 963-1203. Please submit all correspondence to Jerry Weber, Division of Solid and Infectious Waste Management, Northeast District Office, Ohio EPA, 2110 East Aurora Road, Twinsburg, Ohio 44087.

Sincerely,



Jerry W. Weber, R. S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

JWW: cl

cc: File: [Kurko/CONS/A&L Salvage/GRO/15]

ec: Russ Kocher, DDAGW-NEDO  
Lori Barnes, Columbiana County Health Department

# 2916

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Sent To *Steve Callahan*  
 Street, Apt. No., or PO Box No. *A & L Salvage*  
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PS Form 3800, August 2006 See Reverse for instructions

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<p>1. Article Addressed to:</p> <p>Mr. Steven Callahan          A&amp;L Salvage, LLC          11225 SR 45          P. O. Box 333          Lisbon, Ohio 44432</p>	<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for item <i>[initials]</i>  <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
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