



State of Ohio Environmental Protection Agency

Northeast District Office

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

December 20, 2007

RE: **COMPREHENSIVE INSPECTION  
A&L SALVAGE, LLC C&DD LANDFILL**

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

Dear Mr. Brown:

On November 27 and 28, 2007, I, representing the Ohio Environmental Protection Agency (Ohio EPA), conducted a comprehensive inspection of the A&L Salvage, LLC C&DD Landfill (A&L), located at 11225 State Route 45, Columbiana County. The purpose of the inspection was to determine compliance with Ohio Revised Code (ORC) Sections 3714. and 3734., and Ohio Administrative Code (OAC) Chapters 3745-400 and 3745-27. The weather was sunny, windy, and cold with temperatures around 35° to 40° F both days.

Jason Plunkett, representing A&L, accompanied me during the inspection of the facility working face.

On November 27, 2007, Gavin Armstrong, Matt Boyer, and I, representing Ohio EPA, and Beth Shiverdecker, representing Cornerstone Environmental Group, consulting on behalf of A&L, collected gas samples from three gas wells previously installed by using a geoprobe on the facility. The samples were to be analyzed for a wide range of parameters in order to determine if an underground fire may still exist at the facility.

The following violation was observed during this inspection:

1. **Surface Water.** During the inspection on November 27, at a minimum, a storm water violation for failure to follow the facility's storm water pollution prevention plan was observed. At the time of this inspection, sediment-laden runoff from the landfill and/or unpaved access roads was observed running down both the north and south sides of the asphalt access road toward the facility entrance off State Route 45. The sediment-laden runoff was partially intercepted by sediment traps on either side of the asphalt access road, however, it also was observed running by the sediment traps, under the black silt fence at the lowest area of the access road, and into Patterson Run. The silt fence on the north side of the access road had been laid over by mud, and the silt fence on the south side of the access road had a small gap in it between the bottom of the fence and the top of the ground surface. The operator was informed of the condition during the inspection. At the end of the

inspection, the operator indicated that repairs to the silt fence had been made and that the violation had been corrected. Upon leaving the facility, it was observed that repairs to the silt fence on the north side of the access road had been made, however, the gap in the silt fence on the south side of the access road remained.

A&L is in violation because it failed to follow its storm water pollution prevention plan and prevent water pollution at the facility. A&L's failure to prevent water pollution at its C&DD facility is a violation of the following:

- a. **OAC Rule 3745-400-11(B)(16)**: *"The owner or operator shall not cause water pollution."*
- b. **OAC 3745-1-04(A)**: *"The following general water quality criteria shall apply to all surface waters of the state including mixing zones. To every extent practical and possible as determined by the director, these waters shall be...Free from suspended solids or other substances that enter the waters as a result of human activity and that will settle to form putrescent or otherwise objectionable sludge deposits, or that will adversely affect aquatic life."*

In order to return to compliance with all applicable laws and rules, the owner or operator must immediately comply with the facility's storm water pollution prevention plan and repair any surface water control structures which have become ineffective at preventing surface water pollution.

In addition to the above violation, the following observations were made during the inspection:

1. The facility access road between the scale house and working face was very muddy due to recent heavy rains. Facility personnel were spraying mud off departing trucks with garden hoses. The asphalt access road was being cleaned and was relatively clear of mud. Drag out of mud from the facility onto State Route 45 was not observed.
2. No loads of pulverized or unidentifiable debris were observed in the facility's unloading zone on November 27.
3. A relatively small working face was being maintained on November 27. Very little prohibited solid waste was observed in the working face. The prohibited solid waste was removed from the working face during the inspection and did not exceed the regulatory threshold for determining whether a violation was warranted.

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4. A leachate tanker was observed leaving the facility on November 28. Currently, the first three leachate tankers leaving the facility each day are reportedly going to the Elkton wastewater treatment plant. Any additional tankers that transport leachate from the facility on any given day reportedly go to the Alliance wastewater treatment plant.

The owner or operator of A&L must take all necessary measures to return to compliance with Ohio's C&DD and Surface Water laws and rules. Please provide written notification to me within 15 days of receiving this letter which documents how the violation listed above has been corrected, as well as what measures will be implemented in the future to prevent a recurrence of the violation.

Failure to correct the above violation and operate this facility in accordance with all applicable state laws and rules may result in escalated enforcement action being taken against the owner or operator of this facility by Ohio EPA.

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 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 questions regarding this letter, please feel free to contact me at (330) 963-1274, or preferably, e-mail me at "[jerry.weber@epa.state.oh.us](mailto:jerry.weber@epa.state.oh.us)."

Sincerely,



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

JWW:cl

cc: Bruce McCoy, DSIWM-CO  
Nick Bryan, AGO  
Dan Bogoevski, DSW-NEDO  
Robert Morehead, Columbiana County Health Department  
File: [Tukel/CONS/A&L Salvage/COR/15]