



State of Ohio Environmental Protection Agency

Northeast District Office

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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

April 1, 2010

RE: **COMPREHENSIVE INSPECTION
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:

On March 8 and 9, 2010, 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 and windy on both days with temperatures in the range of approximately 40° F to 50° F. With the exception of the uppermost portion of the landfill, large portions of the landfill were snow-covered on this occasion. Ron Rager, representing A&L, was present at the facility both days.

The following violations were observed during this inspection:

1. **Nuisance.** During this inspection strong odors, including hydrogen sulfide, were emanating from the landfill. These odors were detected both on the landfill and off the landfill, on State Route 45. Odors on site rated a "3" on the "0-4" scale on the landfill. A Jerome meter reading of 190 parts per billion (ppb) was registered on top of the landfill adjacent to area of concern #2, which exhibited snow melt. Jerome meter readings as high as 110 ppb were recorded at Ohio EPA's stationary monitor, located at 11204 State Route 45, during this inspection. Jerome meter readings ranging from 5 ppb to 30 ppb were recorded along State Route 45 prior to conducting the on site inspection. The odor intensity during these readings was as high as "2 ½" on the "0-4" scale. The strong odors documented both on and off the facility carried a very strong sulfur odor, and also smelled like burning tires and/or plastic.

There was no evidence that any corrective measures had been taken to eliminate the conditions leading to the generation of hydrogen sulfide gas since the last inspection, conducted on February 24, 2010.

Considering the numerous complaints received, the community surrounding the landfill finds the odors are offensive to the senses and interfere with the comfortable enjoyment of life and property.

A&L is in violation because it has failed to eliminate the conditions leading to the generation of hydrogen sulfide gas, and to control the release of hydrogen sulfide gas. Failure to eliminate the conditions leading to the generation of hydrogen sulfide gas, and failure to control the release of hydrogen sulfide gas which has resulted in odors offensive to the senses and interference with the comfortable enjoyment of life and property of the surrounding community has resulted in a violation of the following:

- a. **OAC Rule 3745-400-11(B)(15):** *"The owner or operator shall not cause or allow operations to create a nuisance or health hazard from noise, dust, odors, and the attraction and/or breeding of birds, insects, rodents, and other vectors."*
- b. **OAC Rule 3745-15-07(A):** *"Except as provided in paragraph (B) of this rule, the emission or escape into the open air from any source or sources whatsoever, of smoke, ashes, dust, dirt, grime, acids, fumes, gases, vapors, odors, or any other substance or combinations of substances, in such manner or in such amounts as to endanger the health, safety or welfare of the public, or cause unreasonable injury or damage to property, is hereby found and declared to be a public nuisance. It shall be unlawful for any person to cause, permit or maintain any such public nuisance."*
- c. **Term 7 of Permit-To-Install (PTI) Number 02-18003:** Term 7, found in paragraph A(7) of the "Part 1 – General Terms and Conditions" section of the permit, states, *"The air contaminants emitted by the emissions units covered by this permit shall not cause a public health nuisance, in violation of OAC rule 3745-15-07."*

In order to return to compliance with the above requirements, the owner or operator must immediately employ any and all measures necessary including covering and capping the facility to eliminate the conditions leading to the generation of hydrogen sulfide, and to control the release of hydrogen sulfide gas from the landfill.

2. **Equipment.** During this inspection, the only operable piece of earth moving equipment at A&L was a track hoe. No other operable earth moving equipment, such as a bulldozer or rock truck, was available at the facility to move and spread cover soil or to correct other conditions such as ponding of water on the landfill that has led to violations being cited at this facility.

A&L is in violation because it has failed to at all times have adequate equipment for operations at the facility. Failure to maintain adequate equipment for operations at the landfill has resulted in a violation of the following:

- a. **OAC Rule 3745-400-11(G)**: *"The owner or operator shall have available at all times adequate equipment for operations."*

In order to return to compliance with this rule, the owner or operator must immediately make available adequate equipment at the landfill to conduct all necessary operations and correct all violations.

3. **Fire Control.** During this inspection, the only operable piece of earth moving equipment at A&L was a track hoe. No other operable earth moving equipment, such as a bulldozer or rock truck, was available at the facility to move and spread cover soil or to perform other activities that would be required in order to control or extinguish a fire. Further, only a small soil stockpile is currently available on the facility.

A&L is in violation because it has failed to have available at or near the facility, adequate fire control equipment, material, and services to control fire and explosion. Failure to have available at or near the facility, adequate fire control equipment, material, and services to control fire and explosion has resulted in a violation of the following:

- a. **OAC Rule 3745-400-11(M)**: *"The owner or operator shall have available at or near the facility, adequate fire control equipment, material, and services to control fire and explosion."*

In order to return to compliance with this rule, the owner or operator must immediately make available adequate equipment, material, and services at the landfill to control or extinguish a fire.

4. **Surface Water Management.** During this inspection, large areas of ponded water were observed on the uppermost portion of the landfill. Melting snow was also the source of large volumes of water that were observed running to low areas on top the landfill and draining through the cover soils and into the landfill. Runoff from the snow was also observed running in shallow channels toward the northwest slope on top the landfill where it suddenly stopped and drained through the cover soil and into the landfill.

A&L is in violation because it has failed to correct the conditions causing infiltration of water through the cover material into the landfill as well as the ponding of water on the landfill. Failure to correct the conditions causing the

infiltration of water through the cover material into the landfill as well as the ponding of water on the landfill has resulted in violations of the following:

- a. **OAC Rule 3745-400-11(Q)(2)**: *"The owner or operator shall control surface and ground water to minimize the generation of leachate in the following manner...The owner or operator shall grade the facility and provide drainage systems to insure minimal infiltration of water through the cover material and cap system as well as erosion of the cover material and cap system."*
- b. **OAC Rule 3745-400-11(Q)(3)**: *"The owner or operator shall control surface and ground water to minimize the generation of leachate in the following manner...If ponding or erosion occurs in active or inactive licensed disposal areas, the owner or operator shall correct the conditions causing the ponding or erosion."*

In order to return to compliance with these rules, the owner or operator must immediately correct the conditions causing infiltration of water through the cover material into the landfill as well as the ponding of water on the landfill.

5. **Construction of Cap System.** A&L ceased to accept debris for disposal at its facility on February 20, 2009. A&L failed to complete construction of a cap system over all areas of debris placement within one year of ceasing to accept debris for disposal at its facility. As a result, the owner or operator did not meet the requirements of OAC Rule 3745-400-12(E)(5)(a) for constructing a cap system and is in violation of the following:

- a. **OAC Rule 3745-400-12(E)(5)(a)**: *"Within one year of ceasing to accept debris for disposal, the owner or operator shall complete construction of a cap system..."*

Please provide written notification to me within 15 days of receiving this letter which documents how the violations listed above have been corrected.

The following were observed and/or discussed during the inspection:

1. Ohio EPA's Special Investigations/Field Unit utilized its geo-probe unit to install five vapor sampling points and thermal couples during these two days.
2. No work is currently being done to prepare the landfill for closure.
3. One large pile and one small pile of scrap tire shreds remain at the facility near the office trailer. The scrap tire shreds were originally approved for use in the

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construction of the drainage layer for the leachate collection system under the landfill. The scrap tire shreds must be removed from the facility and properly disposed in order to prevent breeding of mosquitoes and eliminate any potential for vandalism related to the scrap tires.

A&L must continue to make every effort possible to eliminate the conditions leading to the generation of hydrogen sulfide gas, and to control the release of hydrogen sulfide gas from this facility. Failure to eliminate the conditions leading to the generation of hydrogen sulfide gas, and failure to control the release of hydrogen sulfide gas has resulted in odors offensive to the senses and interference with the comfortable enjoyment of life and property of the surrounding community.

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: File: [Kurko/CONS/A&L Salvage/COR/15]
ec: Bruce McCoy, DSIWM-CO
Kristopher Weiss, PIC
Nick Bryan, AGO
Lori Barnes, Columbiana County Health Department

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PS Form 3800, August 2006 See Reverse for Instructions	

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