



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

September 16, 2010

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

CERTIFIED MAIL

Mr. Steven Callahan
A&L Salvage, LLC
625 Liberty Avenue
Dominion Tower, Suite 3100
Pittsburgh, PA 15222-3124

Dear Mr. Callahan:

On May 12, 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. Ron Rager, representing A&L, accompanied me on the inspection.

The following violations were observed during this inspection:

1. **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 at all times to 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.

2. **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.

3. **Fire Prevention.** During this inspection, combustible debris was observed both on the surface of the landfill and on the surface of the landfill exposed in erosion channels. It appeared that the debris had become exposed to the surface through weathering and subsequent loss of cover materials in those areas, which are significant in size.

A&L is in violation because it has failed to maintain cover, using soil, clean hard fill, or other material which is noncombustible, over all combustible debris disposed at the facility. Failure to cover all combustible debris at the landfill has resulted in a violation of the following:

- a. **OAC Rule 3745-400-11(H)**: *"The owner or operator shall operate the facility in a manner that prevents fires by...covering all disposed combustible debris on a weekly basis with soil, clean hard fill, or other material which is noncombustible. For the purpose of this rule, covering means to apply noncombustible material in a manner such that combustible debris is not visible."*

In order to return to compliance with this rule, the owner or operator must immediately cover all combustible materials disposed at the landfill with noncombustible material.

4. **Surface Water Management.** During this inspection, large areas of ponded water were observed on the uppermost portion of 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...”*

6. **Leachate Outbreaks.** During this inspection, large leachate outbreaks were observed near the toe of the slope on the north side of the landfill.

A&L is in violation because it has failed to contain the leachate, manage and dispose the leachate in accordance with applicable regulations, and repair the leachate outbreaks at the facility. Failure to address the leachate outbreaks at the landfill has resulted in a violation of the following:

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- a. **OAC Rule 3745-400-11(O)(1)**: *"If there is an outbreak of leachate at the surface, the owner or operator shall do all of the following...Contain the leachate."*
- b. **OAC Rule 3745-400-11(O)(2)**: *"If there is an outbreak of leachate at the surface, the owner or operator shall do all of the following... Manage and dispose the leachate in accordance with applicable regulations."*
- c. **OAC Rule 3745-400-11(O)(3)**: *"If there is an outbreak of leachate at the surface, the owner or operator shall do all of the following...Repair the outbreak."*

In order to return to compliance with these rules, the owner or operator must immediately contain the leachate, manage and dispose the leachate in accordance with applicable regulations, and repair the outbreaks.

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. No work was being done to prepare the landfill for closure.
2. 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 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.
3. Strong landfill gas and hydrogen sulfide gas odors were detected on the landfill facility during this inspection. These odors were not detected off the landfill facility on this occasion. 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.

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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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To: **Mr. Steven Callahan**
A&L Salvage, LLC
625 Liberty Avenue
Dominion Tower, Suite 3100
Pittsburgh, PA 15222-3124