



State of Ohio Environmental Protection Agency

Northeast District Office

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

April 26, 2007

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

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

Dear Mr. Rager:

On April 21, 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 with a temperature of approximately 45° F. Winds were out of the north and east.

I was accompanied by Colum McKenna, representing Ohio EPA. Jason Plunkett, representing A&L, accompanied us during the inspection.

The following violations were identified during the inspection:

1. **Nuisance.** During this inspection, faint odors smelling like rotten eggs, related to hydrogen sulfide gas, were emanating from the landfill. Another stronger distinct odor that smelled like landfill gas or leachate was also detected. These odors were detected while we were on the landfill.

While the owner or operator of A&L has improved the covering practices at the facility, including covering more frequently and compacting cover soil, hydrogen sulfide emissions from the facility continue to produce odors.

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.

Since January 3, 2007, Ohio EPA has documented hydrogen sulfide odors either on the landfill or in areas surrounding the landfill during its inspections, and Ohio EPA has continued to receive odor related complaints from individuals who live around the landfill.

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:

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- 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."*

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

2. **Surface Water Management**: During inspections of A&L conducted by DSW-NEDO on April 16 and 17, 2007, surface water violations were observed. Documentation of those violations will be sent to A&L by DSW-NEDO under separate letterhead.

A&L's failure to properly manage surface water at its C&DD facility is at a minimum a violation of the following:

- a. **OAC Rule 3745-400-11(B)(16)**: *"The owner or operator shall not cause water pollution."*
- b. **OAC Rule 3745-400-(C)(2)**: *"The owner or operator shall maintain all applicable permits and authorizations required by Chapters 3704. and 6111. of the Revised Code."*

In order to return to compliance with this rule, the owner or operator must correct the violations which were observed by the Division of Surface Water during its inspections. The following observations were made during this inspection:

1. No drag out of mud from the facility onto State Route 45 was observed.
2. No loads of pulverized or unidentifiable debris were observed in the facility's very small unloading zone.
3. A very small working face was being maintained. A physical inspection of the working was conducted on this occasion, and a small amount of prohibited solid wastes was observed. The prohibited solid wastes were being removed during the inspection. An inspection of the working face at the end of the working day revealed that all prohibited solid wastes had been removed, and covering of the emplaced debris was taking place. Cover soil had been placed on all portions of the ALDA, except the areas being utilized as the unloading zone and working face.
4. A&L reported that it has identified areas on the landfill where hydrogen sulfide emissions were found high. These areas were reportedly covered with limestone and lime prior to applying cover soils in an effort to reduce hydrogen sulfide emissions. After applying cover soils A&L is driving over the cover soils with a vibratory roller in an effort to compact the soil and seal in gas emissions.

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5. A&L should attempt to maintain a better physical separation between the unloading zone and the working face.
6. A&L employees were observed removing prohibited solid wastes from both the unloading zone and the working face during this inspection. Prohibited materials were not, however, being accounted for separately. Prohibited materials from both the working face and unloading zone were being co-mingled in the loader bucket prior to being placed in the roll off box. The facility's daily log sheet requires that the volume or weight of the prohibited materials removed from the unloading and working face be documented separately. Please develop a method by which the proper documentation of these materials is made.

The owner or operator of A&L must immediately take all necessary measures to return to compliance with Ohio's solid waste and C&DD laws and rules. Please provide written notification to me within 15 days of receiving this letter which documents how the violations listed above have been corrected, and what measures will be implemented in the future to prevent any such recurrence of these violations.

Failure to correct the above violations 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."

Sincerely,



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

JWW:cl

cc: Robert Morehead, Columbiana County Health Department
File: [Tukel/CONS/A&L Salvage/COR/15]