



State of Ohio Environmental Protection Agency

Northeast District Office

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

February 25, 2010

RE: PARTIAL INSPECTION RESULTS
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 February 24, 2010, I, representing the Ohio Environmental Protection Agency (Ohio EPA), conducted a partial 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, as well as to investigate areas exhibiting snow melt on top the landfill and to measure temperatures in the installed thermocouples. An off-site odor survey was also conducted on this occasion. The weather was mostly sunny with a very slight breeze from the east and a temperature of approximately 27° F.

I was accompanied by Ron Rager, representing the facility owner or operator during the inspection.

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 "4" on the "0-4" scale on the access road located on the western face of the landfill at the facility. Jerome meter readings of 58 parts per billion (ppb) and 92 ppb were registered on the access road. Jerome meter readings taken on Black Road prior to conducting the on site inspection ranged from 3 ppb at 10699 Black Road, located a good distance north of the landfill, to 130 ppb adjacent to the utility pole near the pond located on the west side of Black Road, near the lowest portion of the road nearest the landfill. Jerome meter readings of 100 ppb, 130 ppb, 110 ppb, 120 ppb, and 110 ppb were registered at the latter location. The odor intensity during these readings was a "3 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 January 12, 2010, or since the last site visit on February 19, 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 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, and to control the release of hydrogen sulfide gas from the landfill.

2. **Ponded Water.** During this inspection, large areas of ponded water were observed on the top of the landfill near the end of the access road. It appears that more widespread settling may be occurring on the flattest portions of the uppermost part of the landfill, which may be contributing to this condition.

A&L is in violation because it has failed to correct the conditions causing the ponding of water. Failure to correct the conditions causing the ponding of water on the landfill has resulted in a violation of the following:

- a. **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*

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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 this rule, the owner or operator must immediately correct the conditions causing the ponding of water on the landfill.

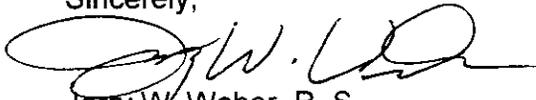
The following observations were made during this inspection:

1. Settling appears to be occurring in and around areas where heating, as evidenced by snow melt, has been documented on the landfill.
2. The following thermocouple temperatures were observed:
 - #1 – 56.9° F
 - #2 – 159.0° F
 - #3 – 146.0° F

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 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: Ramon Mendoza, USEPA
File: [Kurko/CONS/A&L Salvage/COR/15]

ec: Darren Machuga, DAPC-NEDO
Tim Fischer, DAPC-NEDO
Bruce McCoy, DSIWM-CO
Kristopher Weiss, PIC
Nick Bryan, AGO
Ramon Mendoza, USEPA Region 5
Lori Barnes, Columbiana County Health Department