



State of Ohio Environmental Protection Agency

Northeast District Office

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

January 11, 2010

RE: NOTICE OF VIOLATION
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 December 22, 2009, 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 weather was overcast with a breeze from the west and a temperature of approximately 30° F. I was accompanied by Ron Rager, representing the facility owner or operator during the inspection.

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. An off-site odor survey was also conducted on this occasion.

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 near Hart Stable. Winds were out of the west during this inspection. Jerome meter readings taken along State Route 45 in front of Hart Stable ranged from 18 parts per billion (ppb) to 32 ppb.

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."*

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 ponded water was observed on the landfill. Ponded water was observed on top the landfill in areas near where debris was disposed during the final days of operation. It appears that some general 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 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 were observed and/or discussed during the inspection:

1. The cover on the landfill was frozen solid and largely snow covered during this inspection with the exception of a number of areas on the uppermost portion of the landfill. These areas exhibited both melted snow and thawed soil that was soft and mushy. One of these areas in particular, located on the western most side of the top of the landfill was documented to have very strong odors emanating from it. The odors rated at least a "3" on the "0-4" odor intensity scale. Despite the strong winds experienced on top the landfill, the Jerome meter provided a reading of 18 ppb adjacent to this thawed area of the landfill.
2. Mr. Rager reported that approximately 32,425 gallons of leachate were pumped and removed from the landfill in November 2009, and that approximately 24,888 gallons of leachate were pumped and removed from the landfill on December 21, 2009.

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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. One component of being able to control the generation of hydrogen sulfide gas generation is to keep the waste mass dry. That is why it is essential that the conditions leading to the ponding of water on the landfill be corrected immediately.

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: File: [Kurko/CONS/A&L Salvage/COR/15]

ec: Darren Machuga, DAPC-NEDO
Bruce McCoy, DSIWM-CO
Jed Thorp, PIC
Nick Bryan, AGO
Lori Barnes, Columbiana County Health Department