



**Environmental
Protection Agency**

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

Re: 2009 Annual Post-Closure Report
Notice of Violation
Closed St. Marys Landfill
Auglaize County

September 22, 2010

Mr. Thomas Hitchcock
Director of Public Service and Safety
City of St. Marys
101 E. Spring Street
St. Marys, Ohio 45885

Dear Mr. Hitchcock:

The Ohio Environmental Protection Agency (Ohio EPA) received the 2009 Annual Post-Closure Report for the St. Marys Landfill (Facility) on March 29, 2010. Ohio EPA has reviewed the report and has the following comments:

COMMENTS

VIOLATION

1. **The owner/operator, the City of Saint Marys, is in violation of Ohio Administrative Code (OAC) 3745-27-10 (B)(5), which requires an evaluation, including potentiometric maps for every geologic unit monitored, to determine if the requirements of OAC Rule 3745-27-10 (B) are still satisfied. The owner/operator has not provided potentiometric surface maps for all three significant zones of saturation (SZS). These maps, and evaluations, must be provided.**

Based on cross sections provided by the owner/operator in April 2009, there are two, and perhaps three separate significant zones of saturation. (AW-3 and AW-4 are screened in a separate zone from the other SZS wells based on the most recent cross sections.) The owner/operator submitted one map for the "Significant Saturated Units", indicating flow direction; however, since there are two (2) or three (3) significant zones of saturation, there should be a map and evaluation for each of these zones.

STATEMENTS

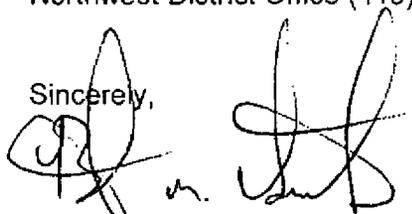
2. **A review of the leachate analytical results indicates that several parameters were analyzed with practical quantitation limits (PQL) which were equal to or greater than the maximum contaminant limit (MCL). Additional detections may have been made if a lower PQL was used. Following is a list of those parameters, the utilized PQLs and the individual MCLs.**

LEACHATE PARAMETER	PQL ($\mu\text{g/L}$)	MCL ($\mu\text{g/L}$)
Benzene	10	5
Carbon Tetrachloride	10	5
1,2-Dichlorethane	10	5
1,1-Dichlorethene	10	7
1,2-Dichloropropane	10	5
Methylene Chloride	50	5
Tetrachloroethene	10	5
1,1,2-Trichloroethane	10	5
Trichloroethylene	10	5
Vinyl Chloride	10	2

3. **It appears that leachate data are for samples collected from the leachate collection system. The leachate collection system at this landfill only captures leachate from the vertical expansion and not from the entire landfill. The area under the vertical expansion is unlined.**
4. **A review of the laboratory QC data for the leachate analysis indicates exceedances of percent recoveries and/or relative percent difference limits. A few of these parameters which display exceedances are qualified; however, some of these parameters which display exceedances are not qualified and there is no explanation of why they are not qualified.**

If you have any questions related to the Groundwater Monitoring System Statements please contact Randy Skrzyniecki at the Ohio EPA Northwest District Office (419) 373-3149. Any questions related to the remainder of this letter, please feel free to contact me at the Ohio EPA Northwest District Office (419) 373-4114.

Sincerely,



Brent M. Goetz, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

/lb

pc: Todd Flagle, City of St. Marys
~~File: Auglaize County, St. Marys Landfill, Annual Report Correspondence~~

ec: Mike Reiser, DSIWM-NWDO
Jack Leow, DDAGW-NWDO, 5-9360
Randy Skrzyniecki, DDAGW-NWDO

Checklist for Review of Annual Reports

This checklist should be used and applied appropriately to all MSW, ISW, and RSW landfills. This checklist should be used as a guide for proper/consistent review of a facility's annual report. An IOC should be forwarded back to the inspector after review. This checklist should be attached. **Note: Shaded areas denote rules/sections which apply to both operating facilities and facilities in post-closure. The performance standard for AR review and returning an IOC to the inspector is 45 days.** Red shaded cells represent information required to be completed.

Compliance note: If any of these items are not provided in the annual report, the inspector should be notified of the item(s) absence (inspector will cite violation, if necessary). If the item(s) is addressed within the annual report, but does not meet the rule, a deficiency should be written in the IOC to the inspector to address this problem.

Facility Name: St. Marys Closed LF.		Annual report year: 2009
Completed YES/NO	Assigned To:	Administrative Tasks
		Completeness determination: All required information is included and report was submitted by April 1. (If not, send NOV) Note: Updated operating record index must also be submitted by April 1.
		Send planning unit a photocopy of Sections 1 - 13 of the report
		Give the engineer sections 12, 14, 15, 18, & 19 of the report (performance standard to give to engineer 10 days) (Note: Sections 18 & 19 might be reviewed by inspectors as well.)
		Received IOC from engineer (15 days)
X		Provide work request to DDAGW, if applicable (10 days)
X		Task : DDAGW to review the potentiometric maps and verify GWMPP adequacy section 21. (45 days)
		Note: OAC 3745-27-10(B)(5) requires an annual evaluation of the ground water surface elevation data to determine that the GWMPP is continuing to adequately assess groundwater quality passing under the facility.
X		Task: DDAGW to review all facilities with an alternative parameters list.
X		Received IOC from DDAGW (45 days)
		Notified unit supervisor of any major issues.
NA		Confirm that approved HD received annual report.
		Prepare appropriate letter noting all compliance issues and send to entity. Check with CO prior to sending letter. Proposed goal - 90 days
		Blind copy Planning Unit on letter to entity

August, St. Marys LF, Annual Report

Compliance	Assigned to:	OAC Rule 3745-27-19, 29-19, or 30-14
YES/NO		
NA		(M)(2) Sections 1-8
		Summary of daily logs for the previous year (forms prescribed by the Director)
		(M)(3) Section 12
		Remaining capacity calculations (Volume (cubic yards)/remaining life (years))
		<i>Important review details:</i>
		1. This section should have two calculations one using the AMDWR and one using average waste receipts.
		2. Total volume remaining should be disclosed clearly. Assumptions relating gate weights to airspace used should be clear.
		3. 1200 to 1400 lbs per cubic yard is usually acceptable.
		4. Calculations should consider daily and intermediate cover. <i>2020/2021</i>
		5. Days of operation should be consistent with PTI. <i>21</i>
		(M)(1) Section 14
		Topographic map. (Areal extent)
		(M)(1) Certified by a professional.
		(M)(1) Scale and contour interval consistent with PTI.
		(M)(1) Updated contour lines.
		(1)(a) Calendar year.
		(1)(b) Areal extent of each phase of construction (written or delineated on plan drawing).
		(1)(c) Areal extent of closed areas with final/interim final cover (written form or delineated on plan drawing).
		(1)(d) Areas with intermediate cover delineated.
		(1)(e) Current working phase and unit delineated or explained.
		(1)(f) Projected phase(s) and unit(s) for filling in the coming year.
		(1)(g) Access roads and buildings.
		(1)(h) On -site Borrow areas/cover material stockpiles (written or delineated on plan drawing).
		(1)(i) Major Compliance concern:
		Comparison of in-place waste limits to permitted waste limits notes:
		<i>Important details to review:</i>
		1. Is the comparison done in a way that compliance is easily determined?
		2. Should be compared to top of waste grade plan drawing from PTI.
		3. Are the actual limits compared to the proper phase drawing?
		4. Elevation of waste placement, including daily and intermediate cover, should be at or below approved waste grade elevations on external and internal slopes.
		5. Take into consideration depth of interim final cover, final cover, access roads, soil stock piles, etc... that could affect topographical representation.

OAC Rule 3745-27-19, 29-19, or 30-14

Compliance	Assigned to:	
YES/NO		
		(M)(4) Section 15
		Leachate collection system data.
		<i>Important review details (check for inclusion of EACH component in the report):</i>
		218,400 last year 113,508 this year none March, July, Sept, Oct.
		1. Monthly leachate production data with a yearly total.
		2. Location of leachate treatment and/or disposal.
		3. Verification that the LCS is operating in accordance with this rule.
		<i>(if leachate recirculation: amount recirculated should be disclosed)</i>
		(M)(5) Section 16
		Reviewed analytical testing of annual grab sample.
		<i>Important review details:</i>
		1. Facilities within post-closure must submit a leachate grab sample.
		2. How was leachate sample collected? Call the facility for this information if the technique is not reported. <i>Does not describe Grab Sample</i>
		3. All parameters in Appendix I of 3745-27-10 should have been tested and reported.
		3745-30-14(M)(5) Section 17 Residual Waste Characterization Data
		(M)(6) Section 18
		Final closure/post closure cost estimates properly adjusted
		<i>Important review details:</i>
		1. Adjusted for inflation (make sure you have appropriate inflation factor)
		2. Represented as an itemized list.
		3. Have other adjustments been made? Are they reasonable?
		4. May include corrective measures cost estimates
		5. Please see the attached financial assurance policy for additional details.
		6. Estimates reflect third party/worst case scenario
		(M)(7) Section 19 Maintenance
		(M)(9) Section 20
		Yard waste exclusion: Instances where source separated yard waste was refused by the owner/operator. (Applicable only if facility has a written yard waste restriction program.)
		(M)(8) Section 22
		Notarized statement signed by the owner/operator saying everything is true and accurate.
		Review Tasks: Scrap Tire Management (Optional) - See Section 10
		If facility accepts scrap tires, are they removed by a registered transporter?
		Does the number of PTE's removed match the records of the receiving scrap tire facility?

Prepare an IOC to the Inspector with the following information:

- List of Deficiencies in Annual Report.
- Operating Year Summary. See guidelines below.
- Financial Assurance Summary. See reporting note below.
- Summary Table for Construction and Remaining Capacity.
- Summary Table for Leachate Management.

Forward to Fanny Haritos and supervisor

Operating Year Summary: This section should explain how the facility operations for the reporting year were performed in relationship with leachate production. For example: "During the 2008 operating year, Suburban South RDF continued filling in Phase 1. No newly constructed areas were opened this year. The external 3 to 1 slopes of Phase 1 were being completed and Phase 1 was approaching approved final grades. Suburban South RDF manages leachate by recirculating it back into the existing waste mass. No leachate was taken off-site for treatment."

Reporting note: The IOC should detail any changes to the financial assurance cost estimates. If they are correct, give exact numbers for closure and post-closure. If they are not correct, explain the deficiency in detail.

Reporting note: The IOC should report the following table under a heading "Summary of Construction and Remaining Capacity"

AMDWR	approved airspace (cu.yd.)	Approved acreage	Waste accepted in 2008 (Tons)	Airspace used in 2008 (cu. yd.)	Total acreage developed	Total airspace used	Total airspace remaining
					As of December 31, 2008		

Reporting note: The IOC should report the following Table under a heading "Summary of Leachate Management"

Total acreage developed	Total leachate production (gal)	Newly opened acreage in 2008	Peak production (gal) (assoc. w/ new cell)	Calculated monthly average (excluding peaks assoc. w/ new acreage)	Using peak month (gal./ac/day)	Using monthly ave. (gal./acre/day)