



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Defiance County Landfill
Inspection Results

May 19, 2011

Defiance County Commissioners
500 Court Street
Defiance, Ohio 43512

Dear Commissioners:

On May 12, 2011, I, representing the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM) conducted an inspection of the Defiance County Landfill (facility). This inspection was conducted in accordance with Ohio Administrative Code (OAC) Rule 3745-37-08(C)(6). The purpose of the inspection was to verify compliance with OAC Chapter 3745-27 and the approved Permits to Install No. 03-8986 and 03-16690. June Crosser represented the facility during the inspection.

This letter is intended to:

- Describe my observations of the facility, and
- Notify the owner/operator of any violations of the rules identified.

Description of Ohio EPA's observations of the facility:

The required daily log of operation was reviewed. Daily logs required by OAC Rule 3745-27-19(E)(10) include the records of the weights of waste received (Form 2), the daily facility inspection checklist (Form 3), and the required weekly surface water structure inspection documentation (Form 4). Incoming waste logs were reviewed through May 12, 2011 and appeared properly completed. The daily inspection checklists were adequately completed and were available for inspections conducted through May 11, 2011. Documentation of weekly surface water inspections conducted through May 3, 2011, was also reviewed.

The PCB/hazardous waste prevention and detection program inspection logs for January 19, 2011, through May 11, 2011, were also reviewed.

The weather at the time of the inspection was warm with a light west wind. Significant rainfall had been received in the days prior to the inspection, including the day of the inspection.

No blown litter was observed during the inspection.

Unit 2 - BAT/South Expansion Area

Waste placement activities had not taken place in Unit 2 since May 5, 2011, when placement activities were moved to Unit 1/Phase 4. Some flagging of waste was observed in Phases 1A and 1B as well as Phase 2 of Unit 2; however, at the time of the inspection an effort was being made to enhance the daily/intermediate cover in all areas of Unit 2. A tarp was being used as daily cover in the northwest corner of 1A to allow for access should the weather prevent access to Unit 1/Phase 4.

The roadways around Unit 2 appeared to be well maintained and provided adequate access should the need arise for the working face to be moved back to Unit 2.

Unit 1 - Old/North Area of the Landfill

Disposal operations have been taking place in Phase 4 since May 5, 2011. The working face was located in the northwest corner of Phase 4 and appeared to be well contained with minimal blown litter. The soil daily cover areas appeared to be adequate with minimal flagging of waste, a tarp was being used as daily cover for a portion of the area.

The roadways leading to Phase 4 appeared to be well maintained and provided adequate access to the working face.

Notification of violations of Ohio laws and rules:

The owner/operator continues to be in violation of OAC Rule 3745-27-10(B)(3)(e) regarding the maintenance of the ground water monitoring wells and piezometers. This violation was cited as a result of a April 11, 2011, inspection and was documented in a May 4, 2011, letter to the owner/operator from Ohio EPA. During the May 12, 2011, inspection it was noted that steps have been taken to correct some of the well maintenance issues that resulted in the violation. Additionally, plans were discussed to address the remaining maintenance issues in the near future.

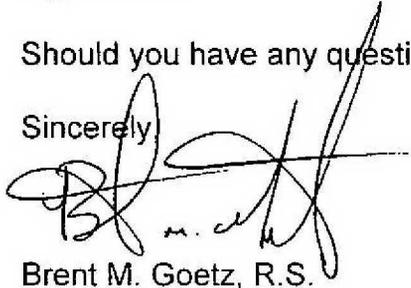
This correspondence addresses specific observations only for the areas of the Defiance County Landfill that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no violations existed at the facility at the time of inspection.

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Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions contained in the Ohio Revised Code Chapter 3734. and the rules promulgated thereunder, does not relieve the owner/operator of the Defiance County Landfill from their obligations to comply with other applicable state and federal laws and regulations.

Should you have any questions, please contact me at (419) 373-4114.

Sincerely,



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

/llr

pc: Mr. Tim Houck, Defiance County Landfill
File: DMWM-SW.Defiance County, Defiance County Landfill, Inspections

ec: Abdul Smiley, DMWM, NWDO
Mike Reiser, DMWM, NWDO