



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

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

Re: Compost Facility Inspection
City of Findlay #32-C4R-1033
Hancock County

April 15, 2010

Mr. Jim Rhodes
Superintendent, Public Works
City of Findlay
330 N. Cory Street
Findlay, Ohio 45840

Dear Mr. Rhodes:

On March 31, 2010, I represented the Ohio Environmental Protection Agency (Ohio EPA) and conducted an inspection of the City of Findlay's (City) Class IV Compost Facility (Facility) located off of Broad Avenue, Findlay. You represented the facility. The weather was sunny and warm. Type A feedstocks, which are classified as source-separated yard wastes, are being composted. You indicated that leaves and brush are primarily accepted. Yard-waste is accepted at the City's yard waste transfer station, near Swale Park at the municipal services property, at the end of W. High St., where the material is processed and then transported to the Facility where it is windrowed. The finished compost is temporarily staged at the Facility before it is taken back to the yard waste transfer station where it is sold to the public.

The Facility is located at the former location of the City's wastewater treatment plant, just south of the Blanchard River. Part of the Facility is located in a recessed area which promotes surface water run-on and ponding of leachate. The management of surface water (Ohio Administrative Code (OAC) Rule 3745-27-45(G)) and leachate (OAC Rule 3745-27-45(H)) are addressed in the compost regulations. OAC 3745-27-45(G) and (H) state that surface water and leachate must be managed in accordance with Chapter 6111 of the Revised Code. Surface water and leachate were not being managed appropriately on this day. **Therefore, the City of Findlay is in violation of OAC Rule 3745-27-45(G) and (H) for failing to properly divert surface water from the material placement area and for failing to minimize leachate production.** Please address the surface water flow and associated leachate production by properly designing and preparing the layout of the material placement area.

In accordance with OAC Rule 3745-27-45(M)(4), for a class IV composting facility, the materials placement areas and leachate management system of the Facility shall be located at least *two hundred (200) feet* from any surface waters of the state. Certain parts of the material placement area were located within two hundred feet of the Blanchard River. **Therefore, the City of Findlay is in violation of OAC Rule 3745-27-45(M)(4) for placing material within two hundred feet of surface waters of the state.** Please move all applicable materials to areas of the Facility that meet the two hundred foot setback from the river.

OAC Rule 3745-27-45(A)(5) states in part, "The owner or operator shall manage any containers used to transport authorized materials to a composting facility that do not meet the definition of biodegradable containers ..." A few plastics bags were noted in the material placement area. Plastic bags are not considered biodegradable and must be removed and properly disposed. More frequent policing of the area is recommended to ensure the plastic bags are removed before composting.

Mr. Jim Rhodes
April 15, 2010
Page Two

Composting regulations require a composting facility to conduct a facility inspection in accordance with OAC Rule 3745-27-45(K)(1)(a) and (b) and complete a daily log in accordance with OAC Rule 3745-27-45(K)(3). The facility inspection must be completed once per day when feedstocks, bulking agents, or additives are received at the facility. The inspection must be completed once per week during the period when feedstocks, bulking agents, or additives are not received and when feedstocks, bulking agents, or additives or curing or cured compost remain at the facility. An administrative survey was performed and Form 2 (incoming log), Form 3 (materials management & distribution) and Form 4 (daily inspection checklist) were reviewed and found to be complete. Please ensure weekly inspections are completed when material is not received at the Facility and while material remains.

OAC Rule 3745-27-45(A)(6) states that the "owner/operator shall prepare, maintain and implement a contingency plan to address discovery of prohibited material, fire, explosion, spills, and equipment failure." Please develop a contingency plan for the Facility and have it available for future inspections.

Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions in ORC Chapter 3734 and the rules promulgated thereunder, does not relieve the owner/operator of his/her obligation to comply with other State and Federal laws and regulations.

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

Please respond to the above noted comments and violations within 14 days of the date of this letter. Furthermore, please contact me once the Facility is in compliance with the two hundred foot setback requirement so that I may revisit the Facility to verify compliance. Written correspondence can be sent to me at the following address:

347 North Dunbridge Road
Bowling Green, Ohio 43402

If you have any questions regarding this letter, please call me at (419) 373-3079.

Sincerely,



Jeremy Scoles, RS
Environmental Specialist II
Division of Solid and Infectious Waste Management

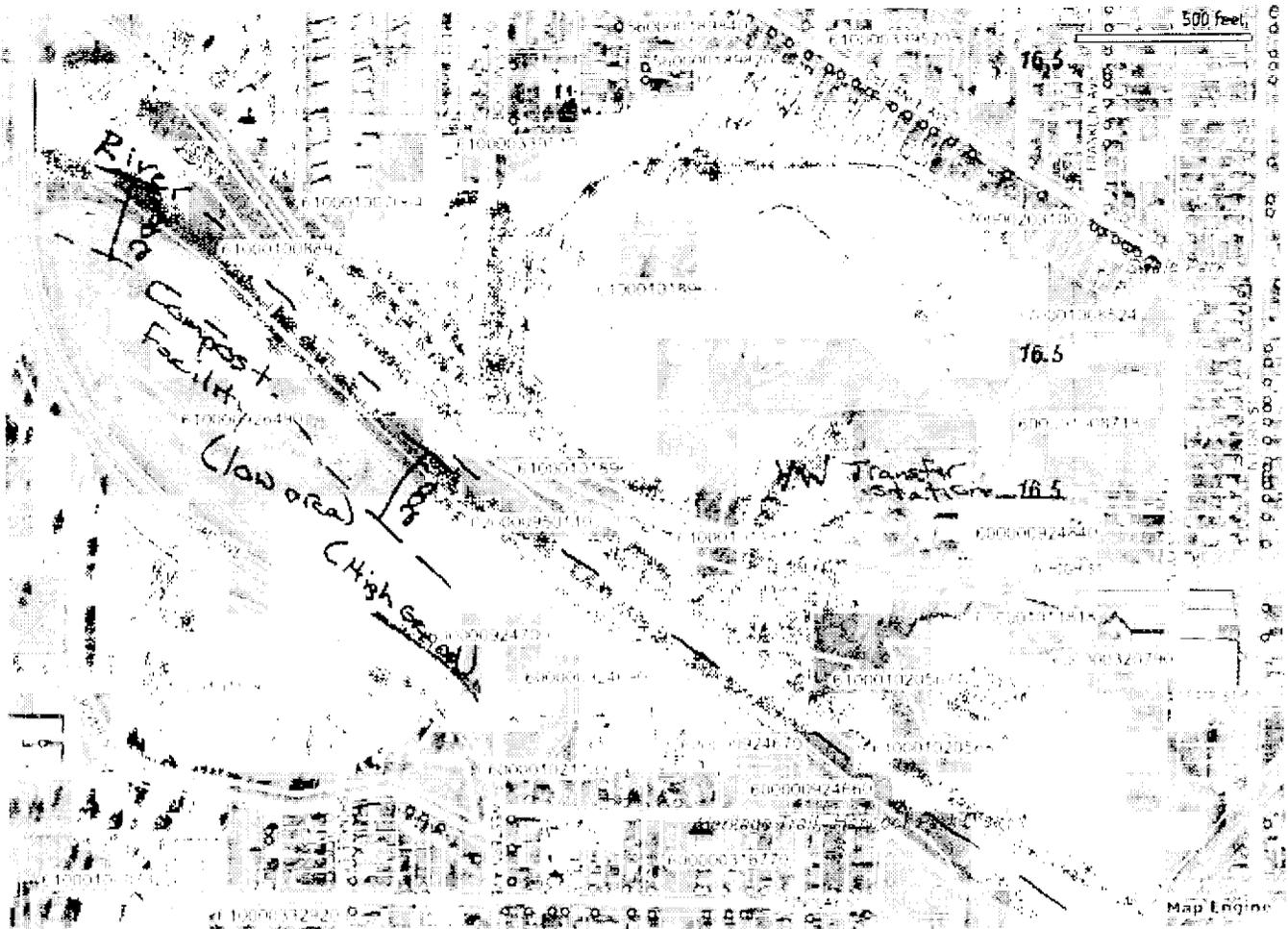
/lb

pc: ~~File: Hancock County, Composting~~

ec: Mike Reiser

Print | Back

Hancock County GIS



Notes