



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Hancock County Landfill
Annual Operational Report 2008
Notice of Violation

August 26, 2009

Hancock County Board of Commissioners
300 South Main Street
Findlay, Ohio 45840

Dear Commissioners:

On August 5, 2009 the Ohio Environmental Protection Agency (Ohio EPA) received a Response to Ohio EPA Comments (Report) regarding the 2008 Annual Operational Report (AOR) for the Hancock County Landfill (Facility). Ohio EPA received the AOR on March 31, 2009 and sent out deficiency comments on July 14, 2009. The Report was prepared and submitted by Malcolm Pirnie, Inc., on behalf of the owner/operator of Hancock County Landfill, the Hancock County Board of Commissioners (Owner/Operator).

Ohio EPA has completed a review of the report and has the following comments:

1. Comment number three of Ohio EPA's July 14, 2009, letter requested that the Owner/Operator ensure filling operations follow the proper phasing sequence depicted in the authorizing documents. The Owner/Operator's response on August 5, 2009, stated that "The County will continue all efforts to place waste in a manner that meets the intent of the [Permit to Install (PTI)] phasing series whenever and wherever it is practical for operations, surface water control, leachate management, and controlling ponding water, erosion, wind, dust, and litter. In addition, waste will be placed in the Phases to allow for preparing areas for future final cover installation and the placement of the active gas system."

The owner/operator is in violation of OAC Rule 3745-27-19(B)(2), which states, "The owner or operator shall conduct all construction and operation at a sanitary landfill facility in strict compliance with the applicable authorizing document, including permit to install, a plan approval, an operational report, an approved closure plan, an alteration concurred with in writing by Ohio EPA, or any authorizing document listed in paragraph (I) of rule 3745-27-09 of the Administrative Code..."

The Facility must follow the applicable authorizing documents and finish each phase, starting with Phase 3, as shown in the PTI before beginning to fill in the next applicable phase.

2. Comment number seven of Ohio EPA's July 14, 2009, letter requested that the Owner/Operator submit the analytical results of the missing parameters from the annual leachate grab sample: temperature, specific conductance, turbidity, and pH. The Owner/Operator submitted the well sampling log as an attachment, which included results for temperature, specific conductance, and pH, as part of the response on August 5, 2009. However, turbidity test was not performed on the leachate sample.

The owner/operator is in violation of OAC Rule 3745-27-19(M)(5), which states, "Results of analytical testing of an annual grab sample of leachate for the parameters specified in appendix I of rule 3745-27-10 of the Administrative Code and for polychlorinated biphenyls (PCBs). The grab sample shall be obtained from the leachate management system."

Please ensure all required parameters are tested on future annual leachate grab samples.

If you have any questions or concerns with any of the comments above, please feel free to contact me at (419) 373-4103.

Sincerely,



Mary B. Wright, E.I., S.I.T.
Environmental Specialist
Division of Solid and Infectious Waste Management

/llr

pc: Nick D'Amato, CO, DSIWM
Wes Rhiel, P.E., Malcolm Pirnie, Inc.
Lindsay Summit, Hancock County Health Department
Steve Trutt, Landfill Manager
Steve C. Wilson, P.E., P.S., Hancock County Sanitary Engineer
File: Hancock County Landfill, Annual Report Correspondence

ec: Ed Merriman, DSIWM-NWDO
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