OhioEPA

State of Ohio Environmental Protection Agency

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

Re: Inspection Results – NOV
RTC – 2006 Annual Report
Lafarge Corporation Landfill
Paulding County

November 29, 2007

Mr. Ben Fogle, Environmental Manager
Lafarge Corporation
P.O. Box 160
Paulding, Ohio 45879

Dear Mr. Fogle:

On November 13, 2007, I represented the Ohio Environmental Protection Agency (Ohio EPA) and conducted an inspection of the Lafarge Corporation Landfill (Facility) for compliance with the residual waste regulations contained in Chapter 3745-30 of the Ohio Administrative Code (OAC). The Lafarge Corporation Landfill is currently classified as a Class III residual waste landfill. You represented the facility during the inspection.

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for August 13, 2007, through November 11, 2007, were inspected and were found to be complete and up-to-date. Continue to make relevant comments on the daily inspection checklist.

OAC Rule 3745-30-14(E)(1)(c) states, in pertinent part: "The owner or operator shall maintain the integrity of the engineered components of the residual solid waste landfill facility and repair any damage to or failure of the components..." As first noted in the March 6, 2007, inspection (letter dated March 27, 2007), erosion was identified along the western slope of the previously constructed portion of Phase 2 that has not been filled. In a submittal dated October 19, 2007, the owner/operator documented the repair of the west slope of the Phase 2, Stage 4 liner at the Facility. In a response letter from Ohio EPA, dated October 23, 2007, concurrence was given stating that the repairs completed were adequate. Therefore, Lafarge Corporation is no longer in violation of OAC Rule 3745-30-14(E)(1)(c).

In a letter dated May 3, 2007, regarding the 2006 Annual Operations Report (2006 AR), Ohio EPA cited Lafarge Corporation in violation of OAC 3745-30-14(B)(2) "for failing to conduct all operations in accordance with the facility's permit to install number 03-9614, by filling CKD outside the certified liner area of the active fill area of Phase 2. The Facility indicated on the Topographic Map that the CKD that is outside the certified liner area will be relocated to Stage 5 of Phase 2 once construction is completed in 2007." During this inspection it appeared that waste had been removed from outside the certified liner area.

However, no mention was made of the relocation of waste in the Stage 5A certification report, received by Ohio EPA on November 9, 2007. Furthermore, the October 25, 2007, response to comments regarding the 2006 annual solid waste operational report simply stated "no response required," with regards to this violation. In order to adequately stop the violation of OAC 3745-30-14(B)(2), the owner/operator must comment on the actions taken to relocate the waste and/or verify that waste has been moved into a permitted area of the Facility. **Please be advised that Lafarge Corporation will remain in violation of OAC Rule 3745-30-14(B)(2) until such time that above mentioned documentation is received by Ohio EPA.**

Furthermore, in the May 3, 2007, letter, Ohio EPA requested that the owner/operator provide a drawing of Phase 2 at an appropriate scale to allow for review. The drawing submitted within the 2006 annual report made it impossible to read the contours, and therefore difficult to determine compliance with the permitted maximum elevation. The maximum permitted waste elevation is 750'. In the October 25, 2007, response to comments regarding the 2006 AR, the owner/operator states, "The scale and contour of the annual report drawings are consistent with the approved plans in accord with the requirements of OAC Rule 3745-30-14(M)(1). In lieu of revised base maps, the facility will provide a supplemental Isopack of the active phase to facilitate comparison of the actual vertical and horizontal limits of emplaced waste to the authorized vertical and horizontal limits of waste placement." Ohio EPA is expecting the supplemental Isopack of the active phase to allow completion of the 2006 annual operational report review. The investigation into existing intermediate cover, as reflected in the October 25, 2007, letter, seems to indicate that the CKD elevation does not exceed 750 feet.

This correspondence addresses specific observations only for the areas of the Lafarge Corporation Class III residual waste landfill 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.

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

Please contact me at (419) 373-3079 if you have any questions concerning this inspection.

Sincerely,

Jeremy Scoles, SIT, CHMM
Environmental Specialist
Division of Solid and Infectious Waste Management

/llr

pc: File: Paulding County, Lafarge Corporation, Inspections
File: Paulding County, Lafarge Corporation, Annual Report Correspondence
ec: E. Jay Murphy, NWDO, DSIWM