Ohio | Environmental Protection Agency

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

Re: Inspection Results
Lafarge Corporation Landfill
Paulding County

December 17, 2010

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

Dear Mr. Fogle:

On December 14, 2010, 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 Facility is currently classified as a Class III residual waste landfill. You represented the facility during the inspection. The weather at the time of the inspection was clear and cold. A layer of snow covered the Facility.

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for September 6, 2010, through December 12, 2010, were inspected. Form 2 was complete in its entirety, as it continues to contain the daily amount of Cement Kiln Dust (CKD) disposed at the Facility, as populated by quarry personnel. Relevant comments have been made in the daily log of operations, Form 3. Please continue to ensure all personnel are aware of the importance of completing the inspections and properly completing the log. Furthermore, Ohio EPA requests that all associated documentation (i.e. work orders and pictures) generated as a result of corrective measures and daily operations be included with the respective daily inspection checklist, Form 3. There were a few instances when the pre-printed name on the daily log of operations did not match the signed name. There were also a few instances when the operator failed to sign Form 2. Please ensure all forms are properly signed.

OAC Rule 3745-30-14(J)(1) states in part:

> *The owner or operator shall ensure that surface water at a residual solid waste landfill facility is diverted from areas where residual solid waste is being, or has been, deposited. The owner or operator shall ensure that a residual solid waste landfill facility is designed, constructed, maintained, and provided with surface water control structures that control run-on and runoff of surface water. These surface water control structures shall ensure minimal erosion. . .*

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

During the September 14, 2010, inspection you indicated that the CKD safety berms on the plateau of Phase 2 could be replaced with soil berms by the end of October. It appeared that seventy-five percent (75%) of the piles of CKD were replaced with soil. The remaining CKD berms are still in place due to operational restrictions in the north-east portion of the active fill area in Stage 5A. Once Stage 5B is constructed in the spring 2011, the remaining CKD berms will be eliminated, due to improved operating techniques in the new cell. Please communicate with Ohio EPA if new information becomes available.

OAC Rule 3745-30-14(B)(2) states in part:

> *The owner or operator shall conduct all construction and operation at a residual solid waste landfill facility in strict compliance with the applicable authorizing document(s), including permit(s) to install. . .*

During this inspection discussions were held regarding the owner/operator's filling procedure, and whether the owner/operator fills the landfill in accordance with the specifications within the Permit to Install (PTI) #03-9614. According to the PTI issued on July 31, 2003, the owner/operator stated in multiple locations that CKD will be placed in a "step formation" and waste will be placed in a controlled manner in 9 to 12-inch lifts for a minimum annual depth of 5.7 feet. By placing the waste in 9-12-inch lifts for a minimum annual depth of 5.7 feet, the owner/operator indicates that this will "maximize absorption" of the precipitation at the Facility. The owner/operator further states that, "After the waste has been unloaded near the working face, the waste will be spread . . . to construct the CKD bench in 9 to 12-inch lifts." The owner/operator has been and is currently dumping CKD in piles and pushing off a leading cliff edge progressing south to north in Phase 2. **The owner/operator of Lafarge Corporation Landfill remains in violation of OAC Rule 3745-30-14(B)(2) for failing to construct and operate the landfill in compliance with the PTI #03-9614.** Please ensure the owner/operator is knowledgeable of all the construction and operating requirements of the PTI. Given the nature of the current phase and stage of filling, Ohio EPA recognizes that there are operational challenges regarding corrective measures that need to take place to return to compliance with the PTI. Part of the remedy for this violation is the construction of the Stage 5B cell. This cell is scheduled to be constructed in the spring of 2011. This cell will allow for the proper filling of waste in a step formation. Please continue to communicate with Ohio EPA regarding your plans for achieving compliance.

As you are aware, there are ongoing communications regarding compliance with the PTI and potential effects surface water run-off is having on the groundwater at the Facility. Ohio EPA is optimistic that attaining compliance with the PTI will have a direct effect on the groundwater quality.

Ohio EPA and you reviewed options to address the surface water run-off from the waste mass. One possibility included building berms to cut off all surface water that has contacted the waste from flowing away from the waste. The surface water would either be absorbed by the waste or collected in the leachate collection system in Stage 5A. Improvement of the berm located at the western edge of Stage 5A has been completed to direct surface water back into the waste mass for absorption and/or collection in the leachate collection system. In addition, adding intermediate soil cover to exposed CKD will reduce the amount of surface water coming into contact with waste; thus reducing the amount of potentially contaminated surface water running off the landfill. Please continue to communicate with Ohio EPA regarding your progress.

Ohio EPA continues to request that the owner/operator communicate corrective actions and/or planned corrective actions in response to the items discussed during all inspections. Telephone calls and/or e-mail correspondence are an appropriate means of communication.

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

/llr

pc: DSIWM-NWDO Paulding County, Lafarge Corporation, Inspections
ec: Abdul Smiley, Mike Reiser