OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Inspection Results
Lafarge Corporation Landfill
Paulding County

February 24, 2010

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

Dear Mr. Fogle:

On February 18, 2010, I, along with Brent Goetz, 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 overcast and cold. The Facility had a minor amount of snow cover.

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for November 16, 2009, through February 14, 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. Good, relevant comments have been made in the daily log of operations. However, the December 7, 2009, inspection report was signed but not completed in its entirety. Please continue to ensure all personnel are aware of the importance of completing the inspections and properly completing the log.

In addition, it was noted during the January 21, 2010, daily Facility inspection that a small amount of CKD was present on top of the west berm in Stage 5A, Phase 2 of the Facility. The location of the CKD was not outside the limits of waste placement. However, please be advised that the berm is in place to keep CKD within the limits of waste placement and to provide a tie-in for future construction. Standard operating procedures at the Facility should include keeping CKD off of the berm. Please ensure the CKD is pushed back inside the berm as soon as weather permits. Please ensure operating procedures for placement of CKD include instructions for keeping CKD back from the berm.

In a letter dated July 14, 2009, from Ohio EPA, regarding the 2008 Annual Operational Report (Report), the owner/operator of the Facility was cited in violation of OAC Rule 3745-30-14(B)(2) for failing to conduct all operations in accordance with the Facility's PermTt to Install number 03-9614, by placing waste above the approved limits at the western slope of Phase 2. During the September 9, 2009, inspection you indicated that your consultant worked with you on surveying and staking proper elevations on the western slope of Phase 2. The overfilled CKD was then regraded to an elevation that is within permit limits. Ohio EPA received an official submittal, dated December 10, 2009, from The Mannik and Smith Group, on behalf of the owner/operator of the Facility, documenting the corrective actions. The documentation includes a topographic map showing the overfill condition no longer exists. The owner/operator is no longer in violation of OAC Rule 3745-30-14(B)(2).

Ohio EPA requests that the owner/operator communicates corrective actions and/or planned corrective actions in response to the items discussed during all inspections. Telephone calls and/or e-mail correspondence is helpful in determining the compliance status at the Facility.

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 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

/lr

pc: James Moseley, The Mannik & Smith Group
DSIWM-NWDO File: Paulding County, Lafarge Corporation, Inspections
DSIWM-NWDO File: Paulding County, Lafarge Corporation, Annual Report Correspondence

ec: Rick Mazur, Mike Reiser