



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

December 11, 2008

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

Dear Mr. Fogle:

On December 5, 2008, Brent Goetz and 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. The weather at the time of the inspection was clear, windy and cold.

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for August 30, 2008, through December 4, 2008, were inspected. Form 2 was missing the daily amount of Cement Kiln Dust (CKD) disposed at the Facility for the past two months. However, you were able to show Ohio EPA the electronic "monthly operating report" and "daily material handling mobile equipment record" kept by the Facility. These documents accurately showed the amount of CKD disposed at the Facility over the past 2 months. Please ensure Form 2 is completed in its entirety. Please continue to ensure all personnel are aware of the importance of completing the inspections and properly completing the log.

The Facility suffered erosion to their containment berm in Stage 5, Phase 2 of the Facility. The erosion occurred outside the certified limits of liner construction. In accordance with OAC Rule 3745-30-14(J)(1), "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 . . ." In accordance with OAC Rule 3745-30-14(J)(2), "If ponding or erosion occurs on areas of the residual solid waste landfill facility where residual solid waste is being, or has been, deposited, the owner or operator shall undertake actions as necessary to correct the conditions causing the ponding or erosion." The owner/operator first logged the erosion on June 10, 2008. A work order to repair the damages was initiated on July 14, 2008. Work to repair the damage commenced on August 29, 2008, when clay was placed at the damage site.

Repair work was completed on the berm on September 29, 2008, according to the daily log of operations. Ohio EPA visually confirmed the repair work during this inspection. The material is there to frost protect the recompacted soil liner (RSL) and added geological material (AGM). Inadequate frost protection can change tie-in points for future construction. Furthermore, the berm appears to buttress the interim slope, which helps keep the slope from sliding out and into uncertified limits.

In a May 3, 2007, letter from Ohio EPA, it was 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 received the supplemental Isopack of the active phase on April 30, 2008. The investigation into existing intermediate cover, as reflected in the October 25, 2007, letter from the owner/operator, seems to indicate that the CKD elevation does not exceed 750 feet. However, the Isopack submitted on April 30, 2008, shows an overfill condition. In addition, during the inspection on May 6, 2008, you indicated that there were three areas of overfill on top of Phase 2. These overfills were indicated by blue flagged stakes. In accordance with OAC Rule 3745-30-14(B)(2), "the owner or operator shall conduct all construction and operation...in strict compliance with the applicable authorizing document(s), including permit(s) to install..." During the September 2, 2008, inspection the owner/operator indicated that the overfill conditions in Phase 2 had been corrected. However, Ohio EPA has not received any supporting documentation from the owner/operator of the Facility indicating that the overfill condition has been corrected.

In a annual report correspondence letter dated July 25, 2008, from Ohio EPA to the owner/operator of the Facility, the owner/operator was cited in violation of OAC Rule 3745-30-14(B)(2) for failing to conduct all operations in accordance with the Facility's permit to install number 03-9614, by placing waste above the approved limits. **Please be advised that the owner/operator of the Facility remains in violation of OAC Rule 3745-30-14(B)(2) and will remain in violation until Ohio EPA is provided with an updated Isopack, or other relevant documentation verifying that the overfill condition has been corrected.**

Furthermore, during this inspection it was discovered that CKD was pushed down the western slope of Phase 2, near the high wall, and was outside the limits of waste placement. The CKD in this 45 foot section needs to be removed and placed back inside the limits of waste placement. **By placing waste outside of the authorized limits, the owner/operator is in violation of OAC Rule 3745-30-14(B)(2).**

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Within 14 days of the date of this letter, please submit a response to Ohio EPA addressing the violations cited above.

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: ~~DSIWM-NWDO~~File:Paulding County, Lafarge Corporation, Inspections \\
DSIWM-NWDOFile: Paulding County, Lafarge Corporation, Annual Report
Correspondence
ec: Edward O'Loughlin, Mike Reiser