



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

September 22, 2008

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

Dear Mr. Fogle:

On September 2, 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 and warm.

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for May 6, 2008, through August 29, 2008, were inspected. In accordance with OAC Rule 3745-30-14(E)(10), "the owner or operator shall inspect the residual waste landfill facility at least daily for ponding, erosion, and leachate outbreaks. Written results of the inspections, including any corrective actions employed, should be made available..." During the inspection, you stated that co-op(s) were no longer utilized to complete the required inspections. Quarry personnel are now responsible for completing the inspections. Please ensure all personnel are aware of the importance of completing the inspections and making relevant activity entries into the log. Furthermore, adequate comments have been made in the daily log of operations pertaining to the identified erosion in the west containment berm of Stage 5, Phase 2.

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."

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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. Please ensure the appropriate actions are taken to correct the conditions causing the erosion and to fix the erosion in a timely manner. The eroded 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 accordance with OAC Rule 3745-30-14(J)(2), "if ponding...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..." The owner/operator was cited in violation of OAC Rule 3745-30-14(J)(2) during the May 6, 2008, inspection for not taking appropriate actions to correct the conditions causing the ponding that was identified along the western slope during the May inspection. The owner/operator documented in the August 14, 2008, daily log of operations that the conditions causing the ponding had been completely fixed. Ohio EPA verified that the conditions causing the ponding had been fixed during this inspection. Therefore, the owner/operator of Lafarge Corporation is no longer in violation of OAC Rule 3745-30-14(J)(2).

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, 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..."

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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 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.**

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

/csl

pc: Paulding County, Lafarge Corporation, Inspections  
Paulding County, Lafarge Corporation, Annual Report Correspondence

ec: Edward O'Loughlin, Brent Goetz, Mike Reiser