



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

May 30, 2008

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

Dear Mr. Fogle:

On May 6, 2008, Brent Goetz, Ned O'Loughlin, 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 February 18, 2008, through May 4, 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 significant ponding was identified along the western slope of the previously constructed portion of Phase 2 that has not been filled. This ponding is not identified in any of the daily inspection logs or additional site maps. **Therefore, the owner/operator of Lafarge Corporation is in violation of OAC Rule 3745-30-14(E)(10).** Please ensure the co-op(s) are also aware of the importance of making relevant activity entries into the log.

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 has not taken appropriate actions to correct the conditions causing the ponding that was identified along the western slope during the inspection. **Therefore, the owner/operator of Lafarge Corporation is in violation of OAC Rule 3745-30-14(J)(2).** In an e-mail dated May 16, 2008, to Ohio EPA, the owner/operator stated, "Lafarge has not been able to completely fill in the area were there was water ponding. I am going to have Miller

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Brothers in next week to take care of the problem." Please notify Ohio EPA when the conditions causing the ponding are corrected.

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. Ohio EPA is in the process of reviewing the submittal to allow completion of the 2006 annual operational report review. 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..." Comments will follow under separate cover once verification of the fill height is determined by the Isopack and topography map included in the 2007 Annual Report submittal.

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

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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

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

ec: Edward O'Loughlin
Brent Goetz