



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 26, 2008

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

Dear Mr. Fogle:

On February 22, 2008, Sue Hardy, 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 cold and the ground was lightly snow covered.

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for November 14, 2007, through February 17, 2008, were inspected. The daily inspection log was not completed for February 9 and 10, 2008. Please ensure daily logs are completed for all days the landfill is in operation. Continue to make relevant comments on the daily inspection checklist. Please ensure the new intern, Katelyn Lamoreau, is aware of the importance of making relevant activity entries into the log.

In a letter dated May 3, 2007, regarding the 2006 Annual Operations Report (2006 AR), Ohio EPA cited Lafarge Corporation in violation of OAC 3745-30-14(B)(2) "for failing to conduct all operations in accordance with the facility's permit to install number 03-9614, by filling CKD outside the certified liner area of the active fill area of Phase 2. The Facility indicated on the Topographic Map that the CKD that is outside the certified liner area will be relocated to Stage 5 of Phase 2 once construction is completed in 2007." During the November 13, 2007, inspection it appeared that waste had been removed from outside the certified liner area. In a November 30, 2007, letter from Mannik & Smith, on behalf of the owner/operator, the owner/operator stated "the overfilled CKD was relocated into the Stage 5 cell..." The owner/operator has adequately addressed the violation of OAC 3745-30-14(B)(2).

Furthermore, in the May 3, 2007, letter, Ohio EPA requested that the owner/operator provide a drawing of Phase 2 at an appropriate scale to allow for review.

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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 is expecting the supplemental Isopack of the active phase to allow completion of the 2006 annual operational report review. The investigation into existing intermediate cover, as reflected in the October 25, 2007, letter, seems to indicate that the CKD elevation does not exceed 750 feet.

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, SIT, CHMM
Environmental Specialist
Division of Solid and Infectious Waste Management

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pc: ~~DSIWM-NWDO File: Paulding County, Lafarge Corporation, Inspections~~
DSIWM-NWDO File: Paulding County, Lafarge Corporation, Annual Report
Correspondence
ec: Edward O'Loughlin, Sue Hardy