



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Inspection Results - NOV
Lafarge Corporation Landfill
Paulding County

August 23, 2007

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

Dear Mr. Fogle:

On August 14, 2007, E. Jay Murphy, Kim Burnham, Tyler Madeker, 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.

An administrative survey of the facility records was conducted. The daily, weekly, and monthly inspection logs for June 2, 2007, through August 12, 2007, were inspected. There were two daily inspection logs (Form 3) not filled out; July 28 and 29, 2007. Please ensure daily inspections of the facility are conducted and documented properly. The remaining inspection logs were complete and up-to-date.

OAC Rule 3745-30-14(E)(1)(c) states, in pertinent part: "The owner or operator shall maintain the integrity of the engineered components of the residual solid waste landfill facility and repair any damage to or failure of the components..." As first noted in the March 6, 2007, inspection (letter dated March 27, 2007), erosion was identified along the western slope of the previously constructed portion of Phase 2 that has not been filled. Erosion damage to the constructed liner constitutes a failure to maintain the integrity of an engineered component. **Therefore, Lafarge Corporation remains in violation of OAC Rule 3745-30-14(E)(1)(c) and will remain in violation until the integrity of the liner is addressed.**

In a letter dated May 3, 2007, regarding the 2006 Annual Operations Report, 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." **Please be advised that Lafarge Corporation will remain in violation of OAC Rule 3745-30-14(B)(2) until such time that the CKD is relocated to a permitted area of the Facility.**

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Furthermore, in the May 3, 2007, letter, Ohio EPA requested that the owner/operator explain the significant difference between the compaction ratios from 2005 to 2006. In addition, Ohio EPA requested that a drawing of Phase 2 be provided 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'. Please provide the information requested and confirm that Cement Kiln Dust (CKD) does not exceed the permitted elevation of 750'.

Ohio EPA would also like to thank Lafarge Corporation for providing a tour of the entire facility. This opportunity allowed the Ohio EPA to become familiar with the entire process of cement manufacturing and CKD generation.

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, S.I.T., CHMM
Environmental Specialist
Division of Solid and Infectious Waste Management

/csl

pc: Andy Porter, Paulding County Health Department
File: Paulding County, Lafarge Corporation, Inspections 3

ec: E. Jay Murphy, NWDO, DSIWM