



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

March 27, 2007

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

Dear Mr. Fogle:

On March 6, 2007, E. Jay Murphy and I represented the Ohio Environmental Protection Agency (Ohio EPA) and conducted an inspection of the Lafarge Corporation Landfill (Facility), residual waste landfill ID # 63-00-02, for compliance with the residual waste regulations contained in Chapter 3745-30 of the Ohio Administrative Code (OAC). The Lafarge Corporation 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 during the inspection. The daily, weekly, and monthly inspection logs for November 4, 2006, through March 5, 2007, 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 erosion was identified along the western slope of the previously constructed portion of Phase 2 that has not been filled. This erosion, which is significant and apparently historical, is not identified in any of the daily inspection logs. Ohio EPA recommends that site maps be included with the daily inspections with damaged areas noted, when applicable. The maps will be an additional mechanism to document when the Facility recognizes opportunities for improvement.

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..." The above referenced erosion damage to the constructed liner constitutes a failure to maintain the integrity of an engineered component. **Therefore, Lafarge Corporation is in violation of OAC Rule 3745-30-14(E)(1)(c).**

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Should the Facility choose to repair the damaged liner now rather than reconstructing it during the construction of Phase 2, Stage 5 liner, a full characterization of the extent of damage must be completed and the Facility must submit a workplan for how the repair will be done. The damaged area was constructed in 2002, so the area has been exposed for nearly 5 years. Repairing the damage now will require the Facility to adequately protect the liner from future erosion by managing surface water flow. During the inspection you commented that the Facility has potentially exceeded the vertical limits of waste placement in the active area of Phase 2. The permit for the Facility allows a maximum waste height of 750 feet (flat) in Phase 2. No data has been given to Ohio EPA at this time that identifies an overflow at the Facility. Ohio EPA will review the topographical maps submitted with the 2006 annual report to verify the Facility's compliance with limits of waste placement.

The northern slope of the active area of Phase 2 is extremely steep. The permit for the Facility allows a 2:1 interim slope through Phase 2. Ohio EPA will review the topographical maps submitted with the 2006 annual report to verify the northern slope of the active area of Phase 2.

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

/csl

pc: Paulding County Health Department
File: Paulding County, Lafarge Corporation, Inspections

ec: E. Jay Murphy, NWDO, DSIWM

Residual Solid Waste Landfill Facility Inspection Checklist

Facility Name: Lafarge Corp. ID #: _____ Date: 3/6/07 County: Paulding
 Facility Address: 11435 Rd 176 Paulding, OH 45879 Facility Phone #: 419-399-4861
 Operator Name: Bon Fogle Operator Phone #: _____
 Corporate Address: _____ Corp. Phone # (If Diff.): _____
 Health District: Paulding Co. Inspector(s): Jeremy Scates + E. Jay Murphy

Is this facility being operated in compliance with the following regulations (YES or NO)? Place an X in the appropriate column to denote compliance status. Placing an X in the NO column indicates that a violation has been noted. Write N/A on the lines that are not applicable to this facility. This checklist is not all inclusive of regulations applicable to Residual Solid Waste Landfill operations.

This is a: Comprehensive Inspection Partial Inspection Comments on Back

YES	NO	YES	NO
3745-27-05 Prohibited Disposal Methods			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(B) Open Burning			
3745-30-14 Operation of a Facility			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(B)(1) Compliance with license			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(2) Operator familiar with approved plans			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(3) Control of noise, dust, odors			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(4) Control vectors			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(5) No water pollution			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(E)(1)(a) Clear naturally occurring vegetation			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(b) Plug/abandon wells			
_____	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	_____
(c) Maintain integrity of eng. components			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(d) Chemical comp. testing (if necessary)			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(e) Stability of fill			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(2) Access roads			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(3)(a) Adequate fire equipment			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(b) Operable and adequate equipment			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(4) Improper salvaging			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(5) Trained employees			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(6) Preparation for inclement weather			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(7)(a) Leachate treatment/disposal			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(b) Phased operation			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(c) Confined unloading			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(d) Separation/control of flammable waste			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(e) Waste disposed at working face			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(f)(i) Compacting bulky items			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(ii) Minimizing dust generation			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(8)(a) NESHAP reg. asbestos disposal			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(b) Acceptance of liquids			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(c) Acceptance of hazardous waste			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(d) Acceptance of PCBs			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(e) Acceptance of low level rad. waste			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(f) Acceptance of semi-solid material w/free liquid			
3745-37-01 License			
<input checked="" type="checkbox"/>	_____	<input checked="" type="checkbox"/>	_____
(A) Valid license			

Inspected daily log from 11/4/06 - 3/5/07. Erosion of liner along the western slope of previously constructed portion of Phase 2. Erosion not noted in logs.

Jeremy Scates | [Signature] | 3/6/07
 Print Name of Inspector Completing Form | Inspector's Signature | Date