



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
Williams County Landfill

April 29, 2008

Mr. Chris Carpenter, General Manager
Williams County Landfill
12604 County Road G
Bryan, Ohio 43506

Dear Mr. Carpenter:

On April 17, 2008, the Ohio Environmental Protection Agency (Ohio EPA) conducted an inspection of the Williams County Landfill (Facility). Scott Walker represented the Facility during the inspection and I represented Ohio EPA. The weather at the time of the inspection was sunny and mild. The Facility had not received rain for several days prior to the inspection. The results for the inspection are detailed below.

OAC Rule 3745-27-19(E)(1)(c) states in part,

The owner or operator shall maintain the integrity of the engineered components of the sanitary landfill facility and repair any damage to or failure of the components...

1. The Cell 1 leachate sump was operational during the inspection. A digital reading of 19.9 was recorded at the leachate sump control center. The "power" indicator light on the control panel was burnt out and in need of replacement. The Agency will continue to monitor this level monthly to ensure the pump continues to operate appropriately.

The flow meter/hours indicator on the Cell 1 leachate sump control center was replaced and functioning on March 20, 2008, as indicated on the daily log of operations and also documented in a letter dated March 24, 2008, sent to Ohio EPA. In a correspondence dated April 21, 2008, the owner/operator indicated that the bulb had been replacement on the Cell 1 leachate control panel.

2. The Cell 2 leachate sump was operational during the inspection. A digital reading of 23.6 was recorded at the leachate sump control center. The Agency will continue to monitor this level monthly to ensure the pump continues to operate appropriately.
3. The Cell 3 leachate sump was operational during the inspection. A digital reading of 23.0 was recorded at the leachate sump control center. The Agency will continue to monitor this level monthly to ensure the pump continues to operate appropriately.
4. A reading of 4.0 was noted on the main leachate storage tanks during the inspection. A reading of 16 indicates the tanks are full and a reading of 0 indicates the tanks are empty. Please continue to implement an aggressive leachate pumping schedule.

OAC Rule 3745-27-19(K)(1) states,

If a leachate outbreak(s) occurs at the sanitary landfill facility, the owner or operator shall repair the outbreak(s) and do the following:

- (a) Contain and properly manage the leachate at the sanitary landfill facility.
- (c) Take action to minimize, control, or eliminate the conditions which contribute to the production of leachate.

5. Two significant leachate outbreaks were identified at the Facility during the inspection. The first leachate outbreak was observed at the extreme north-west peak of the outside slope on the Cell 3 overlay area near the vertical drainage channel. The leachate had traveled approximately 30 feet down slope.

The second leachate outbreak was observed on the west slope of the Cell 3 overlay near the black standpipe/pressure relief pipe. The leachate had traveled down slope approximately 300 feet. The owner/operator should take appropriate actions to identify and eliminate the conditions that contributed to the leachate outbreak.

The owner/operator is in violation of OAC Rule 3745-27-19(K)(1) for failure to contain and properly manage leachate at the facility and for failure to take action to minimize, control, or eliminate the conditions which contributed to production of leachate.

In an e-mail dated April 21, 2008, the owner/operator provided Ohio EPA with pictures showing the corrective measures that had been implemented to control and eliminate the conditions that contributed to the outbreak of leachate on the north-west and western slopes of the Cell 3 overlay area. From the pictures it appears to Ohio EPA that additional soil cover may be needed at the north-west corner. The "sprinkled rip-rap" looks as though surface water may flow through and around the rocks causing additional erosion rills. Please investigate the appropriateness of the corrective actions to control erosion in this area.

The April 21, 2008, e-mail from the owner/operator further stated that the 3 inch force main leachate line was found to be broken during the corrective actions that took place. The line was repaired. Other leachate outbreaks along the 3 inch force main that have been documented in previous months may be contributed to other cracks in the line. Please investigate the integrity of the leachate line at its entirety to verify if a failure(s) in the line has occurred.

OAC Rule 3745-27-19(F) states:

Daily cover shall be applied to all exposed solid waste by the end of the working day to control fire hazards, blowing litter, odors, insects, vectors, and rodents. In no event shall solid waste be exposed for more than twenty-four hours after unloading. Daily cover material shall be non-putrescible, shall not contain large objects in such quantities as may interfere with its application and intended purpose, and shall not be solid waste, unless the owner or operator has received prior, written authorization in accordance with paragraph (f)(3)(a) of this rule.

6. Soil daily cover around and near the working face was adequate during the inspection. However, daily cover was thin near the south-west edge of the previous week's working face. Please continue to ensure adequate daily cover is maintained in all areas of the Facility where waste has been deposited.

The e-mail dated April 21, 2008, indicated that operations have moved south and the area in question has been properly covered with daily cover.

OAC Rule 3745-27-19(G)(1) states in part,

To minimize infiltration, the owner or operator shall apply intermediate cover to all filled areas of a sanitary landfill facility where additional waste is not to be deposited for at least thirty days...

7. Intermediate cover on the north plateau of the Cell 3 overlay was thin in multiple places. Intermediate cover should be periodically checked to ensure the proper thickness (twelve inches) is maintained. Flagging waste should not be visible through intermediate cover. The April 21, 2008, e-mail stated that the owner/operator "leveled out the area on top north of the center cell."

OAC Rule 3745-27-19(J)(1) states in part,

The owner or operator shall ensure that surface water at a sanitary landfill facility is diverted from areas where solid waste is being, or has been, deposited... These surface water control structures shall ensure minimal erosion and infiltration of water through the cover material and cap system...

OAC Rule 3745-27-19(J)(3) states,

If ponding or erosion occurs on areas of the sanitary landfill facility where 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.

8. Significant erosion was observed at west slope of the Cell 3 overlay near the black standpipe. The "second" leachate outbreak identified in comment number 5 is at the same location as the erosion. The erosion had traveled down slope approximately 300 feet and appeared to have followed ruts caused by heavy equipment moving in this location. The owner/operator should undertake actions as necessary to correct the conditions causing the erosion.

The owner/operator is in violation of OAC Rule 3745-27-19(J)(1&3) for failure to minimize erosion and failing to undertake actions as necessary to correct the conditions causing the erosion.

In an e-mail dated April 21, 2008, the owner/operator provided Ohio EPA with pictures showing the corrective measures that had been implemented to control and eliminate the conditions that contributed to the erosion on the western slope of the Cell 3 overlay area. It appears that the owner/operator has taken appropriate measures to address the violation of OAC Rule 3745-27-19(J)(1&3).

OAC Rule 3745-27-19(E)(2) states,

The owner or operator shall construct and maintain all-weather roads within the facility boundary in such a manner as to withstand the anticipated degree of use and allow passage of loaded refuse vehicles at all times, with a minimum of erosion and dust generation.

9. All roads appeared to be in adequate condition. Mr. Walker stated that a new entrance will be constructed to the Facility. The new entrance will be located at the south-east corner of the property, along road G.

OAC Rule 3745-27-19(E)(10) states in part,

The owner or operator shall keep a daily log of operations of the facility that contains all the information specified on forms prescribed by the director. All entries required by the form shall be completed...

OAC Rule 3745-27-19(E)(11)(a) states in part,

The owner or operator shall inspect the sanitary landfill facility at least daily for ponding, erosion, and leachate outbreaks. Written results of the inspections, including a discussion of any corrective actions taken... shall be recorded on the daily log forms.

10. The daily log of operations, Form 3, was reviewed from March 11, 2008, through April 16, 2008. No entries into the daily log of operations had been made identifying the leachate outbreak or erosion noted in comments number 5 and 8, respectively. Ohio EPA is concerned that appropriate daily inspections may not be being completed each and every day. The owner/operator should inspect **all areas** of the landfill and appropriately document areas of leachate outbreaks and erosion and discuss any corrective actions taken. Even in inclement weather, a good faith effort should be made to inspect the Facility.

The owner/operator is in violation of OAC Rule 3745-27-19(E)(11)(a) for failure to adequately inspect all areas of the landfill daily for erosion and leachate outbreaks. Please ensure all areas of the landfill are inspected and proper documentation is kept. The owner/operator has made positive strides in making relevant comments on the daily inspection checklist, but opportunity for improvement still exists.

The owner/operator documented in a letter dated March 24, 2008, to Ohio EPA, that issues with daily inspections were addressed following an inspection on March 10, 2008. The owner/operator stated, "... Scott Walker will be completing the daily inspections going forward. In addition, we are in the process of training Doug Deckrosh, Operations Manager Allied Waste, to complete inspections along with Chris Carpenter, General Manager Williams County Landfill." Please be aware that continued failure to adequately perform and document daily inspections may result in escalated enforcement.

OAC Rule 3745-27-19(E)(11)(b) states in part,

The owner or operator shall inspect sedimentation ponds and sedimentation pond discharge structures, including pipes, ditches, and culverts at least weekly for erosion, clogging, or failure and take prompt corrective action, if necessary.

11. The daily log of operations, Form 4, was reviewed from March 13, 2008, through April 10, 2008, and was complete. The Facility has done a good job in documenting the leachate pump readings (hours), as requested by Ohio EPA, on Form 4.

OAC Rule 3745-27-19(E)(9) states,

The owner or operator shall employ all reasonable measures to collect, properly contain, and dispose of scattered litter, including the use of portable wind screens where necessary and frequent policing of the area.

12. Minor scattered litter was noted on this day. Ample portable wind fences were appropriately staged near the working face.

Miscellaneous Comments

13. The PCB/Hazardous Waste logs were reviewed from March 11, 2008, through April 16, 2008, and were complete. The Facility continues to inspect one load each day the Facility is open. Mr. Walker stated that the Facility takes in on average 120 loads per day. Please ensure that the "one load per day" inspection frequency is still sufficient to meet the required frequency stated in OAC Rule 3745-27-19(L).
14. Please identify and inform Ohio EPA on what the black standpipe in the northwest corner of the Cell 3 overlay area is.

15. The public drop off area was also inspected. This area was well maintained.

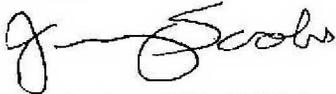
Operational issues, such as the proper application of intermediate cover, recognition of erosion rills, and the importance of maintaining surface water control structures, must be the responsibility of the owner/operator. These operational issues should be recognized by the operator while conducting the daily inspections and documented on the daily inspection logs before the Agency discovers them during the monthly inspections.

Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions in ORC Chapter 3734 and the rules promulgated thereunder, does not relieve the owner/operator of his/her obligation to comply with other State and Federal laws and regulations.

This correspondence addressed specific observations only for the areas of the Williams County 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.

Please call me at (419) 373-3079 if there are any questions regarding this letter.

Sincerely,



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

/llr

pc: Mr. Derek Mauntel, Allied Waste
Mr. Brian Holcomb, Allied Waste

ec: ~~File Copy: Williams County; Williams County Landfill, Inspections~~
Habib Kaake