



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
Notice of Violation

November 9, 2007

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

Dear Mr. Carpenter:

On October 30, 2007, 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 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 15.2 was recorded at the leachate sump control center. The Agency will monitor this level monthly to ensure the pump continues to operate appropriately.
2. The Cell 2 leachate sump was operational during the inspection. A digital reading of 16.3 was recorded at the leachate sump control center. The Agency will 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 15.0 was recorded at the leachate sump control center. The Agency will monitor this level monthly to ensure the pump continues to operate appropriately.
4. A reading of 6.0 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. Ohio EPA recommends maintaining the tanks near the half full mark.
5. The levels in the leachate collection sumps and the leachate holding tanks were significantly lower than previous month's levels. Please continue to implement an aggressive leachate pumping schedule.

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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.

6. One significant leachate outbreak was identified at the Facility during the inspection. The leachate outbreak was observed at the toe of the slope on the Cell 3 overlay area where recent filling has taken place. The leachate had traveled approximately 50 feet down slope to the south west. On the day of the inspection no actions had been taken to minimize, control, or eliminate the conditions which contribute to the production of leachate.

The owner/operator of the Williams County Landfill is in violation of OAC Rule 3745-27-19(K)(1)(a) and (c) for failure to minimize, control, or eliminate the conditions which contribute to the production of leachate. The owner/operator should take appropriate actions to eliminate the conditions that contributed to the leachate outbreak. Actions should also be implemented to minimize the future occurrence of leachate outbreaks at the toe of the slope as filling continues in the Cell 3 overlay area.

On October 31, 2007, Mr. Walker sent Ohio EPA photos and Daily Log of Operations documentation showing that the leachate outbreak had been properly fixed. The violation of OAC Rule 3745-27-19(K)(1)(a) and (c) for failure to minimize, control, or eliminate the conditions which contribute to the production of leachate has been corrected. Please ensure the owner/operator is proactive in identifying and correcting leachate outbreaks at the Facility and not simply reactive to inspection findings.

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.

7. Soil daily cover around and near the working face was adequate during the inspection. Please continue to ensure adequate daily cover is maintained in all areas of the Facility where waste has been deposited.

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...

8. Adequate intermediate cover was present during the inspection. Intermediate cover should be periodically checked to ensure the proper thickness (twelve inches) is maintained. Flagging waste should not be visible through intermediate cover.

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.

9. Erosion was noted on the north slope of Cell 2, approximately 45 feet east of the recently constructed rock letdown. The erosion was significant enough to raise concerns that if not repaired in a timely fashion it may damage the final cover, similar to the damage created by the erosion where the recently constructed rock letdown is located. On the day of the inspection no actions had been taken to minimize, control, or eliminate the conditions which contribute to the production of leachate.

The owner/operator of the Williams County Landfill is in violation of OAC Rule 3745-27-19(J)(3) for failure to take actions as necessary to correct the conditions causing the erosion. The owner/operator should take appropriate actions to eliminate the conditions that contributed to the erosion.

On October 31, 2007, Mr. Walker sent Ohio EPA photos and Daily Log of Operations documentation showing that the erosion had been properly fixed. The violation of OAC Rule 3745-27-19(J)(3) for failure to take actions as necessary to correct the conditions causing the erosion has been corrected. Please ensure the owner/operator is proactive in identifying and correcting erosion at the Facility and not simply reactive to inspection findings.

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.

10. All roads appeared to be in adequate condition. The access road going over the Cell 3 overlay area had been recently reinforced. Furthermore, Mr. Walker indicated that the access road leading down into Cell 3 would be completed by the end of the week in which this inspection was conducted.

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.

11. The daily log of operations, Form 3, was reviewed from September 25, 2007 through October 29, 2007. No information was noted on the daily inspection checklists documenting the leachate outbreak identified at the toe of the slope at the Cell 3 overlay area nor was the erosion identified on the north slope of Cell 2 noted. 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.

The owner/operator of the Williams County Landfill is in violation of OAC Rule 3745-27-19(E)(11)(a) for failure to adequately conduct and document daily inspections.

On October 31, 2007, Mr. Walker sent Ohio EPA photos and Daily Log of Operations documentation showing that the erosion and leachate outbreak had been properly fixed and documented on Form 3 and associated Facility layout map. The violation of OAC Rule 3745-27-19(E)(11)(a) for failure to adequately conduct and document daily inspections has been corrected.

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.

13. The daily log of operations, Form 4, was reviewed from September 25, 2007 through October 29, 2007, and was complete.

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.

14. Minor scattered litter was noted on this day. There was one temporary worker onsite collecting litter.

Miscellaneous Comments

15. The PCB/Hazardous Waste logs were reviewed from September 25, 2007 through October 29, 2007, and were complete.

16. Please identify and inform Ohio EPA on what the black standpipe in the northwest corner of the Cell 3 overlay area is.

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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

/csl

pc: Mr. Derek Mauntel, Allied Waste
Mr. Brian Holcomb, Allied Waste
File-Copy: Williams County, Williams County Landfill, Inspections?

ec: E. Jay Murphy