



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: 2010 Annual Report
County Env'tl of Wyandot LF
Notice of Violation

July 26, 2011

Mr. Randy Traub
County Environmental of Wyandot
11164 County Highway 4
Carey, Ohio 43316-9750

Dear Mr. Traub:

The Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO) reviewed the 2010 Annual Operational Report (Report), dated March 31, 2011, and received on April 1, 2011, for the County Environmental of Wyandot Landfill (Facility). Ohio EPA also reviewed the document titled "County Environmental of Wyandot Landfill 2010 Annual Ground-Water Monitoring System Evaluation per OAC 3745-27-10(B)(5) Wyandot County," dated March 14, 2011, and received on March 17, 2011. The following are comments based on Ohio EPA's the review of the Report and Annual Groundwater Monitoring System Evaluation.

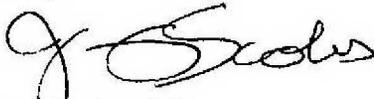
1. Section 18 provides a closure cost estimate for the Facility. Item #2 of the check-list in Section 18 contains a note that states, "The inflation factor that was used for updating costs in operating year 2010 was **1.18%**. This inflation factor applied to any financial assurance instrument that was required to be submitted during 2010." The owner/operator checked "Yes" for this section. However, it appears the cost estimates that were submitted with the Report included the 2011 inflation factor of **1.09%**. The Report is the 2010 annual operations report, therefore cost estimates should use the 2010 inflation factor of 1.18%. Please adjust cost estimates and submit revised costs. Additionally, if changes in closure cost estimates warrant additional financial assurance, the Facility must adjust financial assurance as necessary. If you should have any further questions regarding this requirement, please contact Fanny Haritos at (614) 728-5343 to further discuss this requirement.
2. Based on the 2008 review of the 2007 Annual Operational Report it was discovered that top of waste elevations exceeded permitted top of waste elevations in several areas. Based on that review the owner/operator was cited in violation of OAC Rule 3745-27-19(B) for not conducting all operations at the facility in strict compliance with the applicable authorizing documents. A subsurface investigation was conducted on June 4, 2009, to gather more detailed information regarding this issue. A document submitted by the owner/operator to Ohio EPA, dated August 19, 2009, discusses the results of this investigation. This document confirms that waste exists above the permitted limits of waste placement at several locations at the Facility. The 2010 Annual Operational Report indicates that the waste still exists above the permitted limits. **The owner/operator of the County Environmental of Wyandot Landfill continues to be in violation of OAC Rule 3745-27-19(B) until this issue is resolved.** Ohio EPA has been in contact with the owner/operator multiple times regarding plans for relocating the waste in the summer of 2011.

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3. In Section 10, Scrap Tire Management, the owner/operator is given the opportunity to "report the management method applied to **any** tires received by the Facility. This includes tires that may have been received incidentally in loads of other solid waste" The owner/operator states that no tires were received and all tires are refused at the gate. It is common for tires to be discovered in a load of solid waste after it has been disposed in the working face. Please explain how tires are managed if/when they are discovered in the working face and removed for proper disposal. Please update Section 10, if appropriate.

An additional engineering review may follow under separate cover, if appropriate. Should DMWM's Planning Unit, Central Office, have any further comments, a separate correspondence may also follow. If you have any other questions, please contact me at (419) 373-3079.

Sincerely,



Jeremy Scoles, RS
Environmental Specialist II
Division of Materials and Waste Management

/cs

pc: Jeff Ritchey, Wyandot County Health Department
Phillip E. Beal, P.E., Weaver Boos Consultants
Jim Adams, Republic Services
☞DMWM:SW:~NWDO:File☞

ec: Mike Reiser, Randy Skrzyniecki, Habib Kaake, Jack Leow, Fanny Haritos, Andrew Booker

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