



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: 2008 Annual Operations Report
Evergreen RDF, Wood County

August 18, 2009

Daniel Raezer, Landfill Operations Manager
Evergreen Recycling and Disposal Facility
2625 East Broadway Street
Northwood, Ohio 43619

Dear Mr. Raezer:

On August 11, 2009, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received two letters, dated August 4 and August 10, 2009, in response to Ohio EPA's June 25, 2009 comments concerning the 2008 Annual Operational Report for the Evergreen Recycling and Disposal Facility (Facility). The letters were reviewed to verify compliance with the requirements of Ohio Administrative Code (OAC) Rules 3745-27-19. Following are Ohio EPA's comments regarding the letters.

COMMENTS

Violation

1. **The owner/operator is in violation of OAC Rule 3745-27-19(K)(3), which requires annual inspection of the leachate collection system's collection pipe network, for failing to conduct such an inspection in 2008. The owner/operator must ensure that the leachate collection system's collection pipe network is visually or physically inspected each year.**

Comment No. 1 of Ohio EPA's June 25, 2009 letter requested additional information concerning the owner/operator's inspection of the leachate collection system's collection pipe network pursuant to OAC Rule 3745-27-19(K)(3), which states: *"The owner or operator shall visually or physically inspect the collection pipe network of the leachate management system after placement of the initial lift of waste to ensure that crushing has not occurred and shall inspect the collection pipe network annually thereafter to ensure that clogging has not occurred."*



The owner/operator's response includes a chart documenting a "monthly inspection of the leachate collection system" on February 11, 2008, quarterly cleaning of pumps, a variety of leachate collection system maintenance and repair activities, and installation of leachate collection system components in Cell 11B. On August 13, 2009, I spoke with you and Paul Mazanec to clarify the activities performed during the February 11, 2008 inspection, specifically concerning inspection of the leachate collection system pipe network in the leachate collection system drainage layer. You stated that, with the exception of those in Cell 11B, the collection pipes had not been inspected with a camera or jet-rodged in 2008 and stated that the large volume of leachate pumped by the facility should be sufficient proof that the leachate collection system is functioning properly.

Visual inspection of leachate lateral lines that have been buried during normal waste placement operations under tens of feet of waste is not possible without the use of a down-hole camera. Visual inspection of the riser pipes and above-grade components of the leachate collection system and the drawing of conclusions concerning the functionality of the system based on the volumes of leachate collected are not acceptable substitutes for the visual or physical inspection of the leachate collection system's collection pipe network required by OAC Rule 3745-27-19(K)(3). Ohio EPA considers jet-rodging to be a physical inspection that fulfills the requirements of above-cited rule. If the owner/operator proposes something other than a down-hole camera visual inspection or a jet-rodging physical inspection to fulfill the inspection requirement of OAC Rule 3745-27-19(K)(3), please consider discussing it with Ohio EPA before implementation.

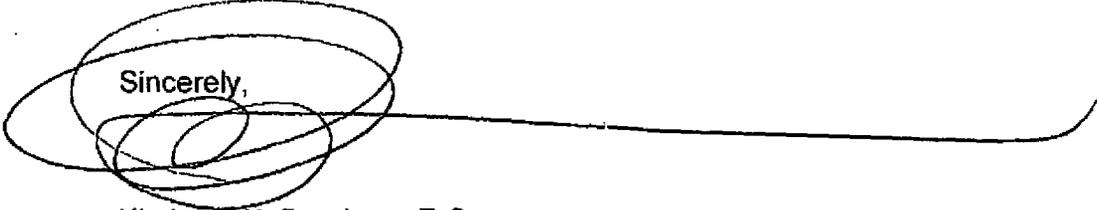
Statements

2. **On August 11, 2009, Angie Gerdeman of Hull & Associates, Inc. and Paul Mazanec met with Andy Drumm and Brent Goetz of Ohio EPA to discuss the Facility's planned response to Comment No. 4 of Ohio EPA's June 25, 2009 letter. The owner/operator is preparing a response to the 2004 and the 2005 cap certification notice of deficiency (NOD) letters.**
3. **The June 25, 2009 letter from Ohio EPA contained five (5) comments regarding the 2008 Annual Report for the facility. The owner/operator's responses to Comments No. 1 and 4 are discussed above. The submittal adequately addressed Comments No. 2, 3, and 5 of Ohio EPA's June 25, 2009 letter.**

Mr. Daniel Raezer
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If you have any questions, please contact Chad Zajkowski at 419-373-3097, Andy Drumm at 419-373-3061, or Brent Goetz at 419-373-4114. Please submit all written correspondence to Brent Goetz at: Ohio EPA, Northwest District Office, Division of Solid and Infectious Waste Management, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402.

Sincerely,



Kimberly K. Burnham, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

/csl

pc: Kristin Tillison, Wood County Health Department
Chad Zajkowski, DDAGW, NWDO
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Allan Razem, Eagon & Associates, Inc.
Angela Gerdeman, Hull & Associates, Inc.
File: Wood County, Evergreen RDF, Annual Report Correspondence

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