



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

April 30, 2007

RE: ~~GALLIA COUNTY~~
~~FAC~~ ~~GALLIA COUNTY LANDFILL~~
COM

Mr. Frank Fello
District Manager
3415 Township Road 447
Glenford, Ohio 43739

Dear Mr. Fello:

On March 27, 2007, Ohio EPA conducted an inspection of the possible impact of a slope slip area on the northeastern portion of Cell 2 A of the Gallia County Landfill (facility). This inspection was necessary to ascertain that the cell's protective liner had not been damaged by the slip. This inspection was made by Brian Queen, Kiet Chung and Trevor Irwin with Ohio EPA's Division of Solid and Infectious Waste Management, Southeast District Office. During this visit, the leachate recirculation percolation sump areas were inspected. On November 29, 2004, Ohio EPA approved an alteration to the facility's permit to allow the recirculation of leachate by means of spraying leachate onto the open working face and by incorporating leachate into percolation sumps. The facility began using the percolation sump method of leachate recirculation in March 2007.

During the inspection of the sump areas, it was observed that the western sump had been overfilled and a pool of leachate had developed on the surface of the intermediate cover. On April 4, 2007, Mr. Irwin and Stuart Lentz, Gallia County Health Department, visited the site and found that a spill had occurred at the eastern sump location. Please see enclosed figures 2, 3 and 4. The western sump no longer had leachate pooled over the cover surrounding the sump pit. Orange staining was observed around the sump area. Please see enclosed figures 6 and 7. Also, it was determined that the sump had been installed thirty-six feet from the final outer slope of cell Phase 2 A. Please see enclosed figure 5. After reviewing the November 29, 2004, approved alteration (Approved Alteration), it was found that any sump was to be installed no closer than sixty feet from final outer slopes (Please see page 4 of the Approved Alteration).

According to the Approved Alteration, if a storage tank was not readily available for use as a leachate sump, a 55 gallon drum would be used as the introduction point (Please see page 4 of the Approved Alteration). The leachate sumps were not constructed in accordance with the Approved Alteration. As per facility personnel, a pit was excavated approximately ten to fifteen feet below surface grade. A thirty-six inch culvert was then placed vertically into the excavation at each sump location. The excavation was then backfilled with fifty-seven aggregate, soil and waste.

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After observing these conditions, it has been determined that the facility has not been implementing the leachate recirculation program in accordance with the approved permit alteration. This is in violation of Ohio Administrative Code (OAC) Rule 3745-27-19(B)(2).

OAC Rule 3745-27-19(B)(2)

(B) Compliance.

- (2) The owner or operator shall conduct all . . . operation at a sanitary landfill facility in strict compliance with the applicable authorizing document(s), including . . . an alteration(s) concurred with in writing by Ohio EPA. . .

This violation continued to accrue since the leachate sumps were installed in early March 2007.

Please respond to this notice of violation in writing within fourteen days, outlining what actions the facility has taken to abate the above noted violation.

Should you have any questions regarding this matter, please contact me at (740) 380-5443.

Sincerely,



Trevor L. Irwin, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

TLI/cb

cc: Stuart Lentz, Gallia County Health Department
Gallia County Commissioners
Gallia County Landfill
Erick Palmer, Waste Management

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APRIL 4, 2007 – TREVOR IRWIN, DSIWM/SEDO

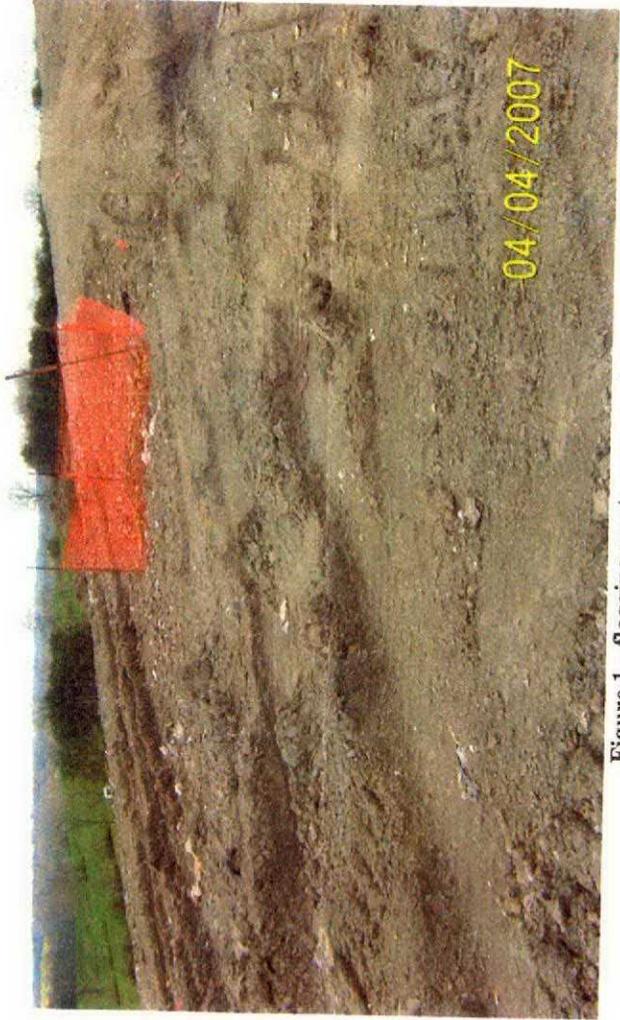


Figure 1 - flagging waste near western sump



Figure 2 - leachate release near eastern sump pit 2

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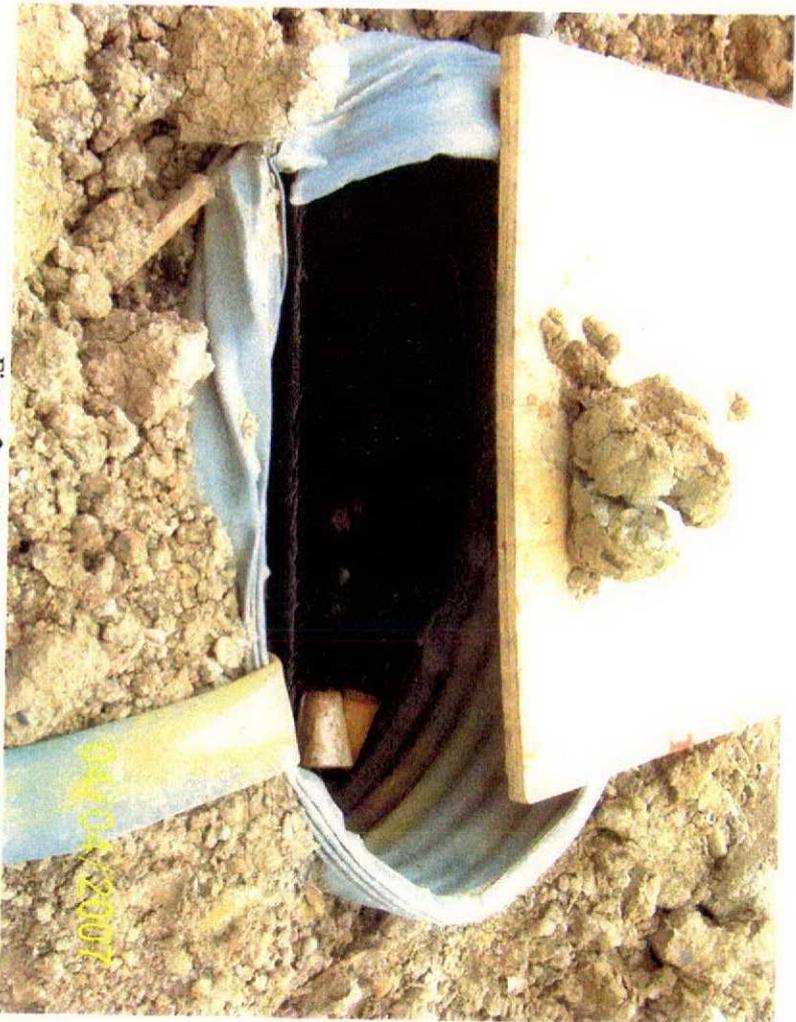


Figure 3 - eastern sump pit

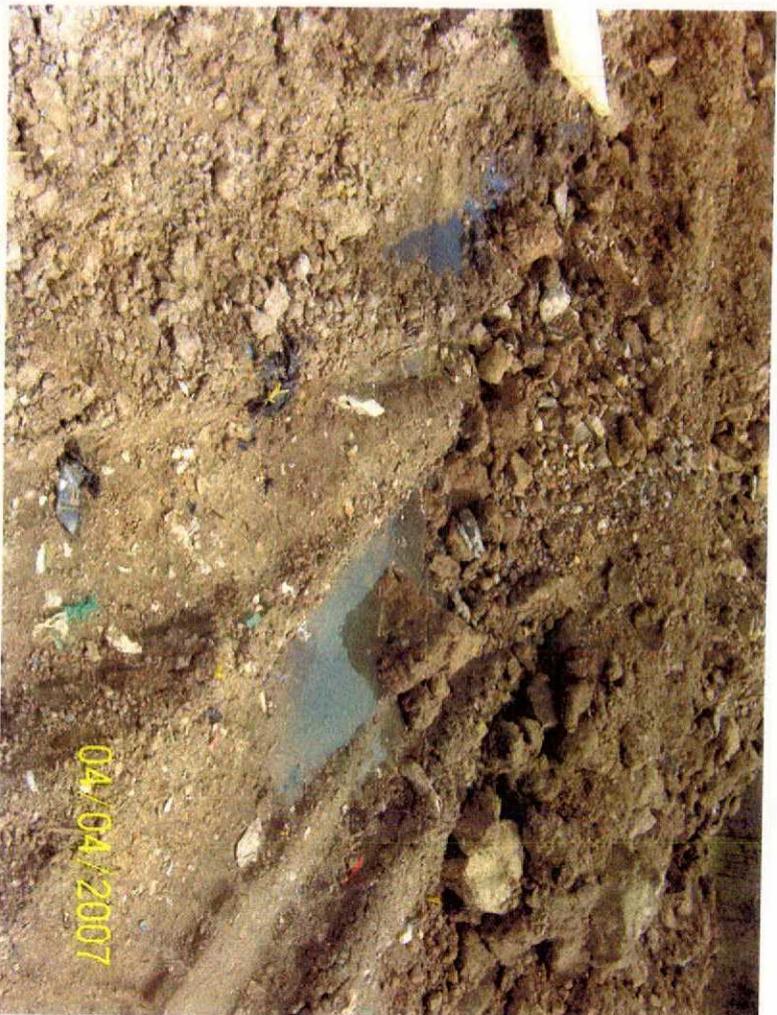


Figure 4 - leachate release near eastern sump pit 1

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Figure 5 - western sump pit distance



Figure 6 - western sump pit 2

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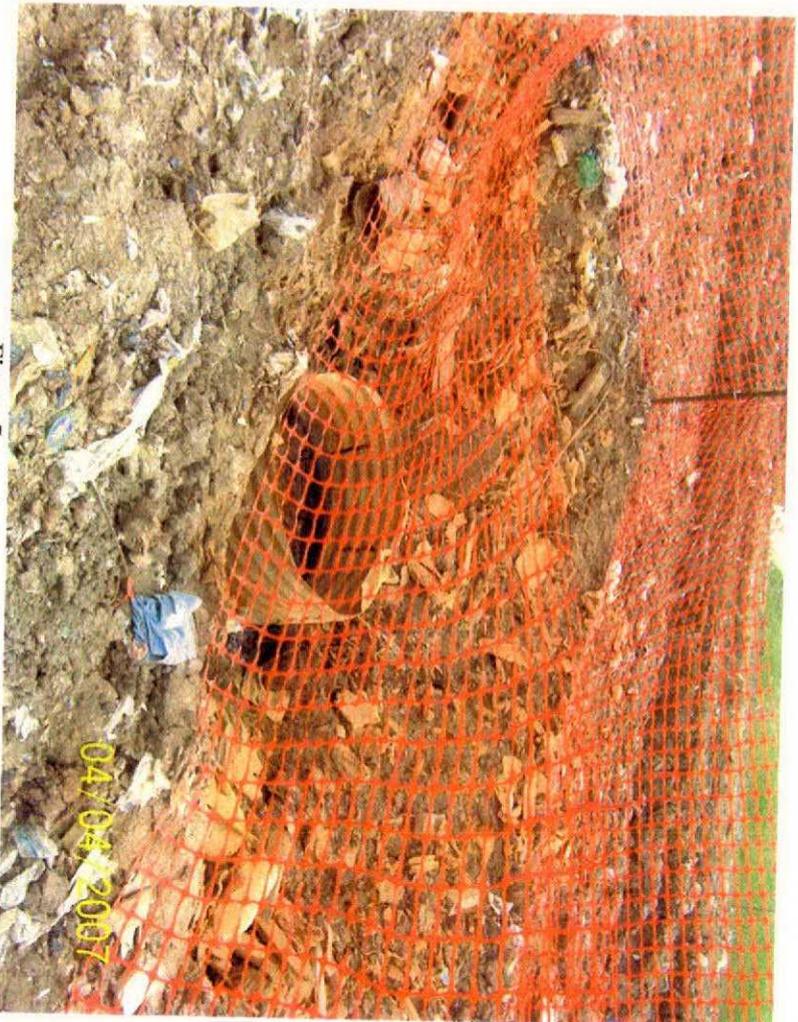


Figure 7 - western sump pit 1