



**Environmental
Protection Agency**

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

May 11, 2011

**RE: NOBLE COUNTY
FAC- CROCK C&DD**

Mr. Ed Crock
Crock C&DD Landfill
17990 State Route 78
Caldwell, Ohio 43724

Dear Mr. Crock:

On March 17, and April 6, 2011, I conducted inspections of the Crock C&D Landfill. I was accompanied by Joe Holland of the Southeast District Office during my March 17 inspection. I was accompanied by Robert Reiter of the Southeast Ohio Joint Solid Waste Management District during my April 6 inspection. During each inspection, I also observed conditions of the nearby area where you have continued to receive waste and have amassed a significant amount of mixed waste.

I met with Ryan Crock during the March 17 inspection. We discussed your stated intentions for recycling the material you have accumulated at this area. Ryan was sorting material from the mixed waste pile. Solid waste was being placed in a rolloff box as it was encountered. Material was placed on the portable screen and hand raked to separate the fines. A tub grinder was present. I observed one pile of ground wood material that Ryan indicated was material to be marketed at your lumber store. This pile was approximately 15 feet in diameter and 7 feet tall. During this visit, a dump truck arrived that was to be loaded with ground wood material that was taken to your lumber store for sale as mulch. Fines and other material that collect under the screen appeared to be left in place or pushed back into the unsorted pile. A comparison of photographs taken over the past year indicates that the mass of unsorted material has doubled in size since October 27, 2010. Solid waste, including mattresses and scrap tires, were observed in the unsorted waste pile.

During my April 6 inspection, Bill Baker was present and operating the trackhoe. Mr. Baker was selecting wood material from the mixed waste pile and placing it on the screen. The pile of processed material was approximately double the total volume of the material observed during my March 17 inspection. Solid waste including mattresses, scrap tires, cardboard packaging, and one bag of household trash were observed in the unsorted waste pile.

Since ceasing active disposal operations at your C&DD landfill, you have continued to accept mixed loads of waste for your customer's disposal in the field adjacent to your landfill. Although you have advised me of your intentions to recycle the waste material, very little recyclable material has been recovered from the mixed waste pile. From your operations to date, it appears that you are only able to separate and recycle a small amount of wood waste into wood mulch. All of the other waste materials are being illegally disposed on your site.

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The following violations were observed during these inspections:

OAC Rule 3745-27-05(C) - No person shall conduct, permit, or allow open dumping.

The waste that you have accepted and placed outside your licensed C&DD landfill contained cardboard, packaging, mattresses, tires, and other solid waste. In addition, the fines which are separated from the woodwaste at the screen are not recovered for proper disposal or processed into a marketable product. The observed deposition of the solid waste constitutes open dumping.

OAC 3745-400-04(B) - No person shall conduct or allow illegal disposal of construction and demolition debris, as defined in rule 3745-400-01 of the Administrative Code.

The deposition of the C&DD and solid waste outside your licensed facility and the material you have removed from your landfill and placed outside the boundary of your licensed facility constitutes illegal disposal of C&DD.

As stated above, a significant amount of waste has been disposed outside your facility. All of this waste must be removed for legitimate disposal in a licensed landfill or legitimately recycled. To date, the only material that has been processed and prepared to be marketed is the clean wood waste separated from the unsorted waste pile. Material such as shingles, vinyl siding, drywall and plywood has not been recycled in any manner. In addition, the fines which are separated from the woodwaste at the screen are not recovered for proper disposal or processed into a marketable product. The separated fine material must be managed as a solid waste.

Please respond within 15 days detailing your actions to abate the above cited violations. As originally requested in correspondence dated October 12, 2010, please provide a list of actual customers, and copies of records verifying the types, dates, and amounts of material received and removed for disposal or as a commodity. Please also list the disposal locations or customers purchasing the material. Please feel free to contact me at 740/380-5219 if you have any questions.

Sincerely,



Peter C. Thompson
Division of Materials and Waste Management

PCT/jg

cc: Jim Warren, Noble County Health Department