



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

August 8, 2008

**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 July 28, 2008, I conducted an inspection of the Crock C&DD Landfill. Equipment operator Bill Baker was present during this inspection. Jim Warren of the Noble County Health Department accompanied me during this inspection.

During this inspection, there was no waste material delivered to the facility. The facility appeared to have adequate cover for fire protection.

Special terms and conditions were included in the 2007 License issued to the Crock C&D Landfill by the Noble County Health Department. The Crock facility is in violation of the following special terms and conditions of the 2007 license:

1. Within 60 days of issuance of this license, licensee shall submit to the Noble County Health Department and Ohio EPA a topographic survey report depicting existing contours and authorized vertical and horizontal limits of waste placement.

Based on information previously provided by you, it appears your facility is overfilled. The information required by Special Condition 1 is important in making a final determination regarding this issue. This information was due to be delivered to Ohio EPA no later than February 28, 2007.

5. Within 60 days of issuance of this license, licensee shall submit a written report to the Noble County Health Department and Ohio EPA detailing actions taken to achieve compliance with conditions 1, 2, 3, and 4 above.

All required activities were to be completed no later than February 28, 2007. A report was to be submitted to the Noble County Health Department and Ohio EPA.

Ohio EPA has completed review of the Topographic Waste Survey Report for the Crock C&DD Landfill in Noble County that was received by the Noble County Health Department on June 12, 2008. The survey was required as part of the special terms and conditions from Crock's approved 2007 License, as issued by the Noble County Health Department.

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Special Condition 1 of the 2007 License states:

*Licensee shall place debris only within the authorized horizontal and vertical limits of the actual licensed disposal area. Within 60 days of issuance of this license, licensee shall submit to the Noble County Health Department and the Ohio Environmental Protection Agency a topographic survey report depicting existing contours and authorized vertical and horizontal limits of waste placement.*

Your submittal provided results from 2006, 2007, and 2008 topographic surveys (plan view and cross sections). None of the provided drawings, however, appear to contain the currently approved vertical limits of waste placement. Additionally, the scale for the plan view topographical surveys is not consistent with the approved license (license drawing is scale of 1 inch equals 60 feet, while the Report drawings are 1 inch equals 100 feet), making manual comparison of the two drawings extremely difficult. The Report cross sections, however, do provide the as-built slopes and reveal numerous slopes of the 2008 survey steeper than the required maximum of 4 horizontal to 1 vertical (4:1 or 25%). A cursory review of the provided survey against the approved license drawing appears to indicate significant overfills (likely in excess of 10 feet). Without the approved vertical limits of waste placement provided on the Report drawings, however, a more accurate determination of the depth and extent of this overfill is difficult to determine.

This report does not meet the terms of Special Condition 1 because it does not include the currently approved vertical limits of waste placement. The report should be revised to include the currently approved vertical limits of waste placement (shown on both plan views and cross sections). Additionally, the scale of the report's plan view drawings should be revised to be consistent with the approved license (scale of 1 inch equals 60 feet). Even without this information, however, it appears that the Facility is overfilled (vertically). The extent and depth of this apparent overfill cannot be accurately determined without the missing approved limits.

Within 15 days, please submit to Ohio EPA a response detailing your intentions and actions taken to abate the above cited violations. Please feel free to contact me at 740/380-5219 if you have any questions regarding the above referenced inspection of the Crock C&DD facility.

Sincerely,



Peter C. Thompson  
Division of Solid & Infectious Waste Management

PCT/jg

cc: Jim Warren, Noble County Health Department