



State of Ohio Environmental Protection Agency

Southwest District Office

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August 15, 2008

Mr. Dave McEntee
Director Environment, Health and Safety
Simpson Paper Company
917 East 11th Street
Tacoma, Washington 98421

RE: Simpson Paper (Closed) Landfill, Butler County
2008 Annual Post-Closure Care Inspection

Dear Mr. McEntee:

On August 13, 2008, I met with Mr. Earl Gay (local contact for Simpson Paper) and conducted an inspection of the closed Simpson Landfill. The purpose of the inspection was to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-14, for post-closure care of a sanitary landfill facility. \

Pursuant to OAC Rule 3745-27-14(A)(2), the owner/operator shall maintain the integrity and effectiveness of the cap system, including making repairs to the cap system as necessary to correct the effects of settling, dead vegetation, subsidence, erosion, leachate outbreaks, or other events, and preventing run-on and run-off from eroding or otherwise damaging the cap system.

The following observations were made during the inspection:

1. I observed a set of large tire ruts in the landfill cap near the base of the access road as you come down the levy (see Figure 1 and 2). The ruts in the cap were as deep as 12" in some portions. **The Facility's failure to maintain the integrity and effectiveness of the cap system is a violation of OAC Rule 3745-27-14(A)(2).** Mr. Gay indicated that the repairs to the cap would be made and the area reseeded to prevent further damage to the cap system. Repairs to the cap system need to begin immediately to maintain the integrity and effectiveness of the cap system.



Figure 1: Large tire ruts on cap

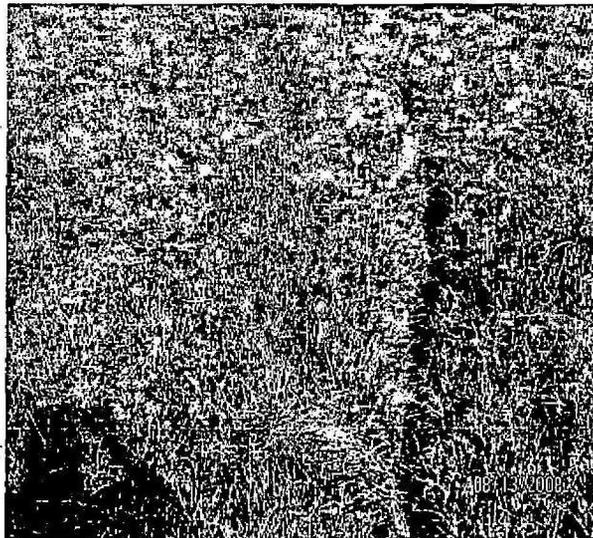


Figure 2: Large tire ruts in cap on NE corner near road

2. I observed several areas of subsidence. Timely maintenance was performed at the Facility to maintain the integrity of the cap system to include the addition of soils, regrading and reseeding of the Facility. Please continue to make the necessary repairs to maintain the cap system.

3. The grass had been mowed prior to Ohio EPA's annual inspection (see Figure 3). Ohio EPA recommends mowing, at a minimum, prior to the facility's quarterly inspections. Tall weeds and grass on the cap impede visibility during an inspection, mowing needs to be done prior to an inspection to make the cap more visible. Mowing is also recommended to prevent tree establishment on the cap system. I would like to thank Mr. Gay for making sure that the mowing was completed before our annual inspection this year. Please continue to address any maintenance issues as they occur.



Figure 3: View of the NW corner of the landfill



Figure 4: View of the landfill NW to SW portion



Figure 5: View of the landfill NE to SE- from top of levy

4. The perimeter access road appeared to be in good passing condition. Please continue to monitor the access road for maintenance during your post-closure inspections and address maintenance issues as they occur.
5. As a reminder please ensure that all quarterly post-closure inspections are submitted to this office within fifteen (15) days after the inspection date detailing the results of the inspection and subsequent maintenance. Please continue to follow your scheduled maintenance agenda in order to maintain the integrity and effectiveness of the cap system.

I would like to thank Mr. Gay for addressing the maintenance issues in a timely manner. Please continue to address all maintenance issues as they occur.

Compliance with the requirements outlined in this letter shall not relieve you of your obligation to comply with other legal obligations, including, but not limited to, Chapter 3745 of the Ohio Administrative Code or Chapters 3704, 3714, 3734 or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Clean Air Act, Comprehensive Environmental Response, Compensation, and Liability Act, or Resource Conservation and Recovery Act remedying conditions resulting from any release of contaminants to the environment.

I would like to thank Mr. Gay for his assistance and cooperation during this inspection. I look forward to working with you in the future. If you have any questions or need additional information, please feel free to contact me at (937) 285-6046.

Sincerely,

Maria Lammers, RS
Environmental Specialist II
Division of Solid and Infectious Waste Management

cc: Mr. Earl Gay, 3602 South Main Street, Middletown, Ohio 45044

ML/rf