



State of Ohio Environmental Protection Agency

Northwest District Office

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

March 27, 2008

Mr. Rex Conway
Ashland County Transportation Manager
Ohio Department of Transportation, District 3
946 North Clark Street
Ashland, Ohio 44805

Dear Mr. Conway:

On March 3, 2008, an inspection of the Ashland ODOT Composting Site (Facility) was conducted by the Ohio Environmental Protection Agency (Ohio EPA). This Facility is a Class II composting facility and must meet the standards set forth in Chapter 3745-27 of the Ohio Administrative Code (OAC). I represented Ohio EPA, and you represented the facility during the inspection.

The inspection consisted of looking at the piles in the compost area, and the facility records in your office. The piles with deer carcasses had some bones protruding. The facility must ensure that adequate cover is maintained on the piles at all times. The daily logs were reviewed from November 29, 2007 through March 3, 2008. No daily inspection checklists were available from February 1, 2008 through February 20, 2008. The owner/operator is in violation of Ohio Administrative Code (OAC) Rule 3745-27-45(K)(1)(b), which states:

(K) Inspection of the facility, the daily log, and pile, in-vessel, or windrow identification. The owner or operator shall inspect the facility, maintain a daily log, and if applicable, establish a tracking system in accordance with the following:

(1) The owner or operator shall inspect the facility a minimum of:

(a) Once per day when feedstocks, bulking agents, or additives are received at the facility.

(b) Once every week during the time period when feedstocks, bulking agents, or additives are not received and when feedstocks, bulking agents, or additives or curing or cured compost remain at the facility.

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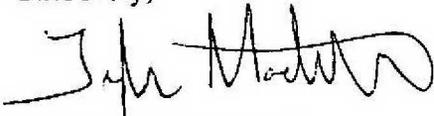
As detailed above, and discussed during the inspection, an inspection of the facility must be completed and documented on the checklist weekly, even if no deer are added to the piles. The inspection checklist must be completed daily when deer are added to the piles.

This correspondence addresses specific observations only for the areas of the Facility that were inspected. Nothing present in, nor absent from this correspondence is intended to mean that no other violations existed at the Facility at the time of the inspection.

Compliance with the requirements in this letter, or the solid and infectious waste provisions contained in the Ohio Revised Code Chapter 3734 and the rules promulgated thereunder, does not relieve the owner/operator of the Ashland County ODOT Composting Facility from their obligations to comply with other applicable state and federal laws and regulations.

If you have any questions, please contact me at the Northwest District Office at (419)373-3078.

Sincerely,



Tyler Madeker, S.I.T.
Environmental Specialist
Division of Solid and Infectious Waste Management

/csl

pc: NWDO File: Ashland County, Composting, Ashland Co. ODOT✓