





Environmental
Protection Agency

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

Re: Inspection Results - NOV
Lafarge Corporation Landfill
Paulding County

November 25, 2011

Mr. Ben Fogle, Environmental Manager
Lafarge Corporation
P. O. Box 160
Paulding, Ohio 45879

Dear Mr. Fogle:

On November 4, 2011, I, along with Mr. Ed Merriman, represented the Ohio Environmental Protection Agency (Ohio EPA) and conducted an inspection of the Lafarge Corporation Landfill (Facility) for compliance with the residual waste regulations contained in Chapter 3745-30 of the Ohio Administrative Code (OAC). The Facility is currently classified as a Class III residual waste landfill. You, along with Mr. Jim Reynolds, represented the Facility during the inspection. The weather at the time of the inspection was clear and mild.

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for September 12, 2011, through October 30, 2011, were inspected. Form 2 was not complete in its entirety, as it did not contain the daily amount of Cement Kiln Dust (CKD) disposed at the Facility, as populated by quarry personnel. In addition, the weekly sedimentation pond inspection was not properly documented as being completed, for the month of September and October. Please ensure this information is populated on Form 2. Relevant comments have been made in the daily log of operations, Form 3. Please continue to ensure all personnel are aware of the importance of completing the inspections and properly completing the log. **Furthermore, Ohio EPA continues to request that all associated documentation (i.e. work orders and pictures) generated as a result of corrective measures and daily operations be included with the respective daily inspection checklist, Form 3. Also, Ohio EPA requests that maps be utilized to identify the daily filling locations within the cell(s), any areas of re-grading, locations of erosion, etc.** The more relevant documentation the owner/operator generates in addition to the Form 3 checklist, the better understanding of operations Ohio EPA has towards the Facility. In addition, please evaluate the need for continued use of the "Interim CKD Management Plan" (Plan). Specifically, item #3 in the Plan refers to inaccurate filing techniques at the Facility. If the Plan is utilized, please ensure item #3 is updated appropriately.

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OAC Rule 3745-30-14(J)(1) states in part:

The owner or operator shall ensure that surface water at a residual solid waste landfill facility is diverted from areas where residual solid waste is being, or has been, deposited. The owner or operator shall ensure that a residual solid waste landfill facility is designed, constructed, maintained, and provided with surface water control structures that control run-on and runoff of surface water. These surface water control structures shall ensure minimal erosion. . .

CKD waste continues to be used as safety berms on top of Phase 2. Please eliminate these CKD berms as soon as possible by either eliminating the need for safety berms all together or by replacing them with soil. In addition, ongoing steps are being taken to cover exposed CKD in Stage 5A to reduce surface water runoff from CKD. It appeared during the inspection that all surface water that comes into contact with CKD is now contained within the landfill. Please take additional actions to shed surface water away from Stage 6 that has not come into contact with CKD (i.e. covered portion of Stage 6, portion of western slope that has cover, haul road leading into the cell, etc.).

OAC Rule 3745-30-14(B)(2) states in part:

The owner or operator shall conduct all construction and operation at a residual solid waste landfill facility in strict compliance with the applicable authorizing document(s), including permit(s) to install. . .

During this inspection on-going discussions were held regarding the owner/operator's filling procedure, and whether the owner/operator fills the landfill in accordance with the specifications within the Permit to Install (PTI) #03-9614. According to the PTI issued on July 31, 2003, the owner/operator stated in multiple locations that CKD will be placed in a "step formation" and waste will be placed in a controlled manner in 9 to 12-inch lifts for a minimum annual depth of 5.7 feet. By placing the waste in 9-12-inch lifts for a minimum annual depth of 5.7 feet, the owner/operator indicates that this will "maximize absorption" of the precipitation at the Facility. The owner/operator further states that, "After the waste has been unloaded near the working face, the waste will be spread . . . to construct the CKD bench in 9 to 12-inch lifts." The owner/operator is currently dumping CKD of the back of dump trucks and spreading it with a dozer in Stage 6. The CKD is not currently being placed in a level lift over the entire area of Stage 6. Furthermore, current operations are allowing ponding water in the Stage 6 cell. **The owner/operator of Lafarge Corporation Landfill remains in violation of OAC Rule 3745-30-14(B)(2) for failing to construct and operate the landfill in compliance with the PTI #03-9614.** Please ensure the owner/operator is knowledgeable of all the construction and operating requirements of the PTI. When significant amounts of water (leachate) pool on the waste in Stage 6 it should be pumped out to allow for the proper filling of waste.

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Furthermore, the owner/operator may need to reevaluate the absorption rate of the CKD, as specified in the PTI.

As you are aware, there are ongoing communications regarding compliance with the PTI and potential effects surface water run-off is having on the groundwater at the Facility. Attaining compliance with the PTI may have an effect on the groundwater quality. The owner/operator has also placed additional intermediate cover on the western slope of Phase 2 to reduce the amount of CKD that is exposed to surface water.

The owner/operator has been communicating with Ohio EPA over the last several months regarding waste placement issues at the Facility. These issues were addressed during the review of the 2010 annual operational report in a letter dated July 22, 2011. **The owner/operator of Lafarge Corporation continues to be in violation of OAC Rule 3745-30-14(B)(2) for failing to conduct all operations in accordance with the Facility's permit to install (PTI) number 03-9614, by placing waste above the approved horizontal and vertical limits at the eastern slope and northern slope of Phase 2.** By all preliminary indications, the owner/operator has successfully placed waste back inside the permitted limits of waste placement. Be advised that documentation (i.e. isopac, etc.) will need to be submitted to demonstrate compliance with the permitted waste placement that an overfill no longer exists at the Facility.

According to the PTI, Liquid Collection System Operations Plan, the owner/operator shall maintain a "liquid collection system inspection checklist" on a weekly/monthly/or quarterly basis. In addition, if leachate is deeper than two (2) feet in the sump then the sump will be pumped until the leachate is less than six (6) inches. Please ensure this checklist is utilized and that the sump is pumped when necessary. Furthermore, Ohio EPA requests that the sump be pumped down and monitored to identify the recharge rate of the sump, as discussed during the inspection.

Ohio EPA continues to request that the owner/operator communicate corrective actions and/or planned corrective actions in response to the items discussed during all inspections. Telephone calls and/or e-mail correspondence are an appropriate means of communication. **Please respond to the identified violations in this letter within 14 days of the date of this letter. Furthermore, please send the results of the liquid collection system inspections and pump down activities to me.**

This correspondence addresses specific observations only for the areas of the Lafarge Corporation Class III residual waste landfill 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 inspection.

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Compliance with the requirements outlined in this letter, or the solid and infectious waste provisions contained in Ohio Revised Code Chapter 3734 and the rules promulgated thereunder, does not relieve the owner/operator of Lafarge Corporation Landfill from their obligation to comply with other applicable state and federal laws and regulations.

Please contact me at (419) 373-3079 if you have any questions concerning this inspection.

Sincerely,



Jeremy Scoles, RS
Environmental Specialist II
Division of Materials and Waste Management

/llr

pc: Jim Reynolds, Quarry Mgr., Lafarge
Tim Weible, Lafarge
DMWM-SW, Paulding County, Lafarge Corporation, Inspections

ec: Abdul Smiley, Mike Reiser, Ed Merriman – Ohio EPA
Brian Gasiorowski, Lafarge Regional Env'tl Manager.
(Brian.Gasiorowski@lafarge-na.com)