



**Environmental  
Protection Agency**

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

Re: Seneca County  
Sunny Farms Landfill  
Annual Report 2010 and  
Ground Water Response  
Notice of Violation

December 14, 2011

Mr. Chris Valerian  
12386 Township Road 108  
Fostoria, Ohio 44830

Dear Mr. Valerian:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the submittal (received November 10, 2011) from CEC, Inc. which responds to the March 15 and June 6, 2011, letters from Ohio EPA regarding the December 2010 annual ground water sampling event and the 2010 Annual Operating Report. This submittal was reviewed to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-10 and OAC Rule 3745-27-19.

**COMMENTS**

**Statements**

1. All issues of the March 15, 2011, letter from Ohio EPA have been adequately addressed.

The March 15, 2011, letter from Ohio EPA contained five (5) comments regarding the December 2010, annual ground water sampling event. The November 8, 2011, submittal from CEC, Inc. adequately addressed Comment No. 1 of the March 15, 2011, letter. Comments No. 2 through 5 of the March 15, 2011, letter from Ohio EPA did not require a response.

2. Comment No. 2 of the June 6, 2011, letter from Ohio EPA has been adequately addressed. However, Comments No. 1, 3 and 4 of the June 6, 2011, letter from Ohio EPA remain outstanding.

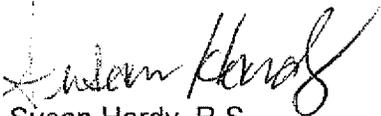
On October 26, 2011, Nicki Rumschlag and Jim Mohrman representing the Seneca County Health Department, Susan Hardy representing Ohio EPA and Ed Brdicka representing Sunny Farms landfill met and discussed many issues. Included in the discussion was the incomplete Annual Operating Report (AOR). Mr. Brdicka stated a response would be immediately submitted.

- a) Comment 1 of the AOR stated, "As required by OAC Rule 3745-27-19(M)(1), the annual operational report must contain a topographical map that includes specified information. The topographical map was not included with documentation received by Ohio EPA. Please submit the map."
- b) Comment 3 stated, "Table 7.2: Out-of-District Transferred Waste Disposed, list receiving Archbold Refuse Transfer Station solid waste as 21,068.96 tons. Archbold Refuse Service transfer station list 21,184.70 tons of solid waste disposed at Sunny Farms landfill. Please clarify this discrepancy."
- c) Comment 4 stated, "Table 9.1 Subtotal of Transferred and Direct-Haul Waste Received in 2010, (T) Total tons of waste received, lists 1,025,423.32 tons of waste. Total from monthly Authorized Maximum Daily Waste Receipts (AMDWR) reports total 1,025,405.86. Please clarify this discrepancy."

**The owner/operator is in violation of OAC Rule 3745-27-19(M) for failure to submit the topographical map. OAC Rule 3745-27-19(M) states, "Annual operation report. The owner or operator of a sanitary landfill facility shall submit an 'annual operational report' to the appropriate Ohio EPA district office and approved health department not later than the first day of April of each year. The "Annual Operational Report" shall include, at a minimum, the following information summarizing the previous calendar year's operations..." Please submit the topographical map and response to comments immediately.**

If you have any questions please contact me at Ohio EPA, Northwest District Office, Division Materials and Waste Management, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402.

Sincerely,



Susan Hardy, R.S.  
Environmental Specialist  
Division of Materials and Waste Management

/llr

pc: Ed Brdicka, Sunny Farms Landfill, LLC  
Jim Mohrman, Seneca County Health Department  
John DiNunzio, Civil & Environmental Consultants  
NWDO File: DMWM/SW, Seneca County, Sunny Farms Landfill, Annual Report  
Correspondence and Groundwater

ec: Ken Brock, DDAGW, NWDO  
Jack Leow, DDAGW, NWDO  
Lindsay Taliaferro, III, DDAGW, CO  
Mike Reiser, DMWM, NWDO  
Andy Drumm, DMWM, NWDO  
5-11036