



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Put-In-Bay Township
Solid Waste Inspections

September 4, 2007

Put-In-Bay Township Trustees
Box 127
Put-In-Bay, Ohio. 43456

Dear Trustees:

On July 23, 2007, I, representing the Ohio Environmental Protection Agency (Ohio EPA), conducted inspections of South Bass Island's Transfer Station and Class II Composting Facility, located at 624 Trenton Avenue, Put-In-Bay, Ohio. These inspections were conducted in accordance with Ohio Administrative Code (OAC) Rule 3745-37-08(C)(6). The purpose of these inspections was to determine compliance with Chapters 3745-27 and 3745-37 of the Administrative Code and the Director's Final Findings and Orders effective August 9, 1994 (DFF&O). Ned O'Loughlin of Ohio EPA was also present during the inspection. A Put-In-Bay Township employee represented the facility during the inspections. Following are my observations.

Transfer Facility

The Transfer Facility instructions were posted on the fence at the entrance of the facility and on the front of the transfer station building in compliance with OAC Rule 3745-27-23(G). The access road from the gate to the transfer station building was well-maintained. The interior of the transfer station building was well-maintained.

Numerous BFI dumpsters and compacter boxes were staged around the building. Two of the smaller dumpsters contained solid waste. Later in the day, I spoke with the BFI route driver. He stated that these dumpsters were to be taken out of use and repaired. Ensure that waste is not left in dumpsters or boxes stored at the transfer station location or while awaiting repair. Waste should be removed from stored dumpsters and boxes and transported from the island (when the ferries are running) or placed on the transfer station tipping floor and compacted into the in-use box.

One full open top roll-off box was located in the Lake Disposal tipping area. Nine small Lake Disposal dumpsters were staged at the top of the hill. In addition, recycleable metal items were staged near the top of the hill.

The contingency plan, located in a binder in the mailbox, was reviewed. Please review the contact names and numbers included in the contingency plan. Several of the BFI employees listed in the plan are no longer with BFI. Update the plan to include current contact information for BFI, Lake Disposal, and Put-in-Bay Township personnel.

The required daily log of operations forms were reviewed. Form 3, the Daily Inspection Form, was reviewed for June 7 through July 23, 2007, and appeared to be properly completed. Incoming and Outgoing Materials Logs, Forms 2A and 2B, were on file for Lake Disposal for May 22, 2007, May 23, 2007, and May 29, 2007. Forms 2A and 2B that stated "No activity" were on file for BFI for March 26, 2007 and May 31, 2007.

Two BFI compacter boxes full of waste were on-site during the March 29, 2007, inspection. The removal of these boxes should have been documented on in the Outgoing Materials Log. I contacted Mr. Rick Rothert, township clerk, via telephone during the inspection to discuss status of the missing BFI logs. Mr. Rothert stated that he has been working with BFI to try to obtain the missing logs. Locate and forward the missing logs to my attention upon receipt of this letter.

The owner/operator of the Put-In-Bay transfer station continues to be in violation of OAC Rule 3745-27-23(U) for failing to properly record facility operations. This violation was also citing in the June 29, 2007, letter regarding the June 6, 2007, inspection.

Composting Facility

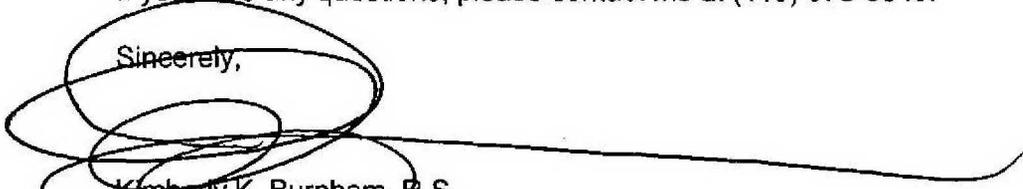
The composting facility is located on the same property as the transfer facility. The facility consists of one windrow of wood chips and fish wastes combined, and a stockpile of wood chips and grass clippings. Several pieces of fish were visible in the windrow and a strong odor of fish was noted. I spoke with Mr. Steve Riddle of the South Bass Island State Park regarding the need to fully cover all fish wastes. Mr. Riddle stated that he would provide training to state park employees responsible for fish waste management to ensure all fish wastes are fully covered.

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

Compliance with the requirements outlined 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 facility from their obligations to comply with other applicable state and federal laws and regulations.

If you have any questions, please contact me at (419) 373-3049.

Sincerely,



Kimberly K. Burnham, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

/llr

pc: Mr. Dave Vossmer, Browning-Ferris Industries of Ohio, Inc.
Neil Carlson, Browning-Ferris Industries, Sandusky
Anthony Bailey, Lake Disposal Services
Steve Riddle, South Bass Island State Park
Tom Seaberg, Put-In-Bay Township Maintenance
Kimberly Burnham, DSIWM, NWDO
NWDO file: Ottawa County, Islands, inspections >