



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

June 29, 2007

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

Dear Trustees:

On June 6, 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). Mr. Tom Seaberg 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 empty BFI dumpsters and compactor boxes were staged around the building. It appeared as though the area where the box attaches to the compactor hopper had not been cleaned in some time. It is Ohio EPA's expectation that spillage will be removed from the attachment area each time a box is switched out. This observation was also included in the March 30, 2007 report regarding the March 29, 2007 inspection.

One full open top roll-off box was located in the Lake Disposal tipping area. Four small Lake Disposal dumpsters were staged at the top of the hill. In addition, recyclable 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 March 30 through June 6, 2007 and appeared to be properly completed. No Incoming or Outgoing Materials Logs, Forms 2A and 2B, were available after April 2, 2007. Two

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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 Outgoing Materials Log. Mr. Seaburg stated that Lake Disposal has used the transfer facility throughout the spring. Incoming and outgoing logs documenting Lake's use of the facility should have been documented on Incoming and Outgoing Materials 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 is in violation of OAC Rule 3745-27-23(U) for failing to properly record facility operations.

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. Ensure that all fish wastes are fully buried as they are added to the windrow.

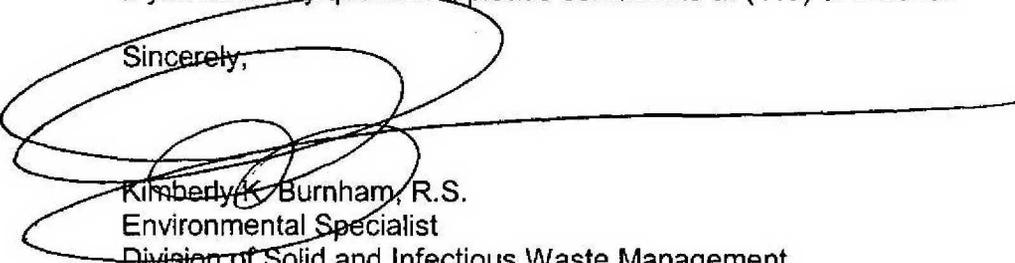
The composting windrow area had been regraded and filled with asphalt fines. The windrow was moved slightly to the southeast to move it out of the way of Lake Disposal activities.

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

/lb

pc: Mr. Dave Vossmer, Browning-Ferris Industries of Ohio, Inc.
Anthony Bailey, Lake Disposal Services
Tom Seaberg, Put-In-Bay Township Maintenance
Kimberly Burnham, DSIWM, NWDO

~~NWDO file: Ottawa County, Islands, inspections~~