



**Environmental
Protection Agency**

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

February 2, 2012

**BELMONT COUNTY
COMP – RIVER VALLEY COMPOST
NOV**

Mr. Stanley Kaldor
61280 Ray Ramsey Road
Jacobsburg, Ohio 43933

RE: Notice of Violation

Dear Mr. Kaldor:

On January 27, 2012, Mark Mansfield and I conducted an inspection of River Valley Compost (Facility). During our visit, we inspected the Facility and daily logs that were available for viewing in the office. We discussed why you had not received your 2012 License. I explained to you that you would be contacted by Central Office to discuss the steps you need to take in order to return to compliance.

During the course of my inspection, the following violations were observed:

Ohio Administrative Code	Rule
3745-27-01(B)(2) (Biodegradable containers shall have an ASTM standard of D6400-04 or D6868).	Biodegradable containers" means a container composed of materials, such as vegetable matter, paper, cardboard, and plastics that meet the American Society for Testing and Materials (ASTM) "Standard Specification for the Compostable Plastics" (D6400-04) (www.astm.org) and that may display the International Biodegradable Products Institute's "Compostable Logo," that will decompose or degrade at a rate equal to or faster than the material within the containers under equivalent conditions.
3745-27-45(A)(5) (plastic bags that are at the facility) Remove bags.	The owner or operator shall properly manage any containers used to transport authorized materials to a composting facility that do not meet the definition of biodegradable containers as defined in rule 3745-27-01 of the Administrative Code. Such containers shall not be introduced into the composting process except at a class I composting facility where the owner or operator is mixing such containers with type J feedstocks.
3745-27-45(C)(1)(d) Trash must be contained in a container not in a pile on the ground.	All reasonable measures are employed to collect properly contain and dispose of scattered litter, including the use of portable wind screens and frequent inspections of the facility.
3745-27-45(G)(2) (Leachate accumulation on the property.)	Surface water management. The owner or operator of a composting facility shall control surface water runoff and run-on, prevents ponding and erosion, and minimizes the impact to surface and ground waters. For the purpose of this rule runoff includes precipitation that has

	<p>fallen onto the composting facility and has not come in contact with any compost products, or solid wastes including feedstocks, bulking agents, or additives. At a minimum, the owner or operator shall do the following: Divert surface water from the materials placement areas. The land surface of the waste handling, composting, compost curing, and cured compost areas of the facility shall be greater than or equal to one per cent in slope and less than or equal to six per cent in slope so as to direct surface water to collection points or otherwise control the surface water drainage to minimize erosion. <i>[Comment: The owner or operator of a composting facility, where different feedstock types are accepted, may be subject to cross contamination as described in paragraph (I) of this rule. When applicable, the owner or operator should consider cross contamination in the design of the slope at the facility.]</i></p>
3745-27-45(H)(3)(b)	<p>Leachate management. The owner or operator of a class I, II, III or IV composting facility shall do the following: Take action to minimize the production of leachate and control, or eliminate, ponding of leachate and the conditions that contribute to the discharge of leachate from the facility.</p>
<p>3745-27-45 (A)(3) November 2, 2011 – November 7, 2011 and January 22, 2012 – January 27, 2012 was not available at the time of inspection</p>	<p>The owner or operator of a composting facility shall have a copy of all applicable authorizing documents available for inspection by Ohio EPA or the approved health department during normal operating hours.</p>

During our inspection of the facility you informed us that you were using 18 inch cardboard tubes as a “sock” to absorb leachate along with wood chips. You indicated that the cardboard would absorb the leachate. Mark Mansfield explained to you that this method will not work. The water will go under the “sock” or travel around it. The “sock” was not working at the time of the inspection. Also, the toilet paper still on the rolls will make its way over the hill side. You will need to come up with another way to manage the leachate on site.

If you have any questions, please contact me at (740) 380-5228.

Sincerely,



Erika Jackson, RS
Environmental Specialist II
Division of Materials and Waste Management

EJ/sb

cc: Matt Boyer, CO-DMWM