



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director



1IN0014220080606

BROWN

RUMPKE WASTE INC *

PIEKUTOWSKI, MA 2008/06/06



State of Ohio Environmental Protection Agency
Southwest District

401 East Fifth Street
Dayton, Ohio 45402-2911

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Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

June 5, 2008

Mr. John Hattersley
Rumpke Waste, Inc.
10795 Hughes Road
Cincinnati, Ohio 45251

**Re: Rumpke/Brown Co. LF & Adams Co. LF – IU Inspections
Rumpke Brown Co. CEI - OH0109193;1IN00142*BD -- NOTICE OF VIOLATION**

Dear Mr. Hattersley:

On May 8, 2008, I conducted annual pretreatment wastewater inspections at the Brown County and Adams County Landfill. In addition, I conducted a Compliance Evaluation Inspection (CEI) at the Brown County landfill for the facility's NPDES permit. Rumpke was represented by you. These sites are considered to be significant industrial users (SIUs) because of their potential to impact the wastewater treatment plants. The inspection at Adams County covered the leachate collection tanks. The inspection at Brown County covered the leachate collection tanks, the leachate collection telemetry system, the bleach addition for green leachate, and the storm water retentions ponds and their associated discharges.

Permitting

Rumpke has two effective indirect discharge permits for the Brown and Adams Counties landfills. The Brown County site is discharging its leachate to the Village of Georgetown Wastewater Treatment Plant (WWTP). Rumpke has an indirect discharge permit for the Village of Georgetown for the Adams County landfill. The leachate from Adams County is discharged to the same manhole the leachate from Georgetown is discharged. The NPDES permit for the storm water/sedimentation pond discharges from the Brown County site has been effective since April 1, 2005. It was modified during 2006 for the proposed landfill expansion. This modification became effective on February 1, 2007.

Sampling

Rumpke is submitting its sampling data using e-DMR. The sampling data for the indirect discharge permit is being submitted on the 4519 form, while the sampling data for the NPDES permit are submitted on the 4500 form. There was one violation of the facility's NPDES permit. There were three frequency violations in August 2007 at each of the three outfalls at the landfill. This letter will serve as the Notice of Violation.



EFFLUENT LIMIT VIOLATIONS

Station No. 1IN00142003

Parameter	Code	Date	Reported	Units	Permit Limit
pH	00400	05/16/07	9.09	SU	9.0 SU

FREQUENCY VIOLATIONS

Station No. 1IN00142001

Reporting Period	Violation Date	Parameter	Sample Frequency	Expected	Reported
Aug. 2007	08/15/07	Turbidity	1/Week	1	0
Aug. 2007	08/15/07	Color	1/Week	1	0
Aug. 2007	08/15/07	Odor	1/Week	1	0

Station No. 1IN00142002

Reporting Period	Violation Date	Parameter	Sample Frequency	Expected	Reported
Aug. 2007	08/15/07	Turbidity	1/Week	1	0
Aug. 2007	08/15/07	Color	1/Week	1	0
Aug. 2007	08/15/07	Odor	1/Week	1	0

Station No. 1IN00142003

Reporting Period	Violation Date	Parameter	Sample Frequency	Expected	Reported
Aug. 2007	08/15/07	Turbidity	1/Week	1	0
Aug. 2007	08/15/07	Color	1/Week	1	0
Aug. 2007	08/15/07	Odor	1/Week	1	0

Please be advised that failure to comply with the effluent limitations, or to satisfy monitoring or reporting requirements of your NPDES permit may be cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. This office has received written notification as the reasons for the above referenced violations, as well as the actions taken

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or proposed to prevent any further violations.

There were no violations of the indirect discharge permits at Brown or Adams County. On January 3, 2007, the pH was coded as AA for Brown County. This must be investigated. The pH should not be below detect.

Other Items

The green leachate at Brown County discussed during last year's inspection has stopped. The leachate has returned to its normal color. The bleach decolorization system is no longer needed. There were still bleach totes stored on the pad by the leachate collection tanks at Brown County. Rumpke did obtain a permit to install for this treatment system as required in last year's inspection.

The outfalls from the three sediment ponds were also clear. All three of the ponds were discharging at the time of the inspection. It had been raining on the day of the inspection.

Rumpke is still working with the 401 certification group regarding a proposed expansion at the landfill.

The leachate tanks at the Adams County facility have a new telemetry system. This will measure the level in the tank receiving the leachate. When it reaches the high level mark, an alarm will be sent. The leachate will then flow into the second tank until the tanks are pumped.

If you would have any additional questions, feel free to contact me at 937.285.6108.

Sincerely,



Marianne Piekutowski
District Pretreatment Coordinator
Division of Surface Water

Enclosures

Cc: Derrick Copas, Georgetown
Jim Hext, Rumpke
Julia Zhang, DSW/CO



State of Ohio Environmental Protection Agency
Southwest District Office

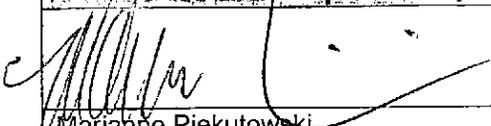
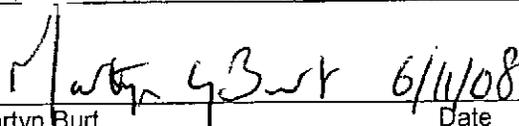
Pretreatment Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00048*AP	OHP000203	05/08/2008	I	S	?

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Adams County Landfill 4150 Pumpkin Ridge Road West Union, Ohio	9:30 am	08/01/2005
	Exit Time	Permit Expiration Date
	10:00 am	07/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
John Hattersley/Civil Engineer	513.851.0122x3162	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
Village of Georgetown WWTP	Potential to Adversely Impact the Wastewater Treatment Plant	

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
S	Pretreatment		

Section D: Summary of Findings (Attach additional sheets if necessary)	

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 6/5/08	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 6/11/08



State of Ohio Environmental Protection Agency
Southwest District Office

Pretreatment Compliance Inspection Report

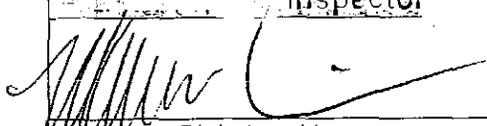
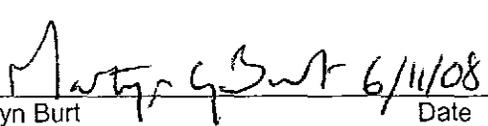
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1DP00033*DP	OHP00020	05/08/2008	I	S	2

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Brown County Landfill 9427 Beyers Road Georgetown, Ohio	11:00 am	08/01/2005
	Exit Time	Permit Expiration Date
	12:30 pm	07/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
John Hattersley/Civil Engineer	513.851.0122x3162	
POTW Receiving Discharge	Categorical Standard(s) or Other Classification	
Village of Georgetown WWTP	Potential to Adversely Impact the Wastewater Treatment Plant	

Section C: Areas Evaluated During Inspection			
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)			
S	Pretreatment		

Section D: Summary of Findings (Attach additional sheets if necessary)

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Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office Date: 6/5/08	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office Date: 6/11/08



State of Ohio Environmental Protection Agency
Southwest District Office

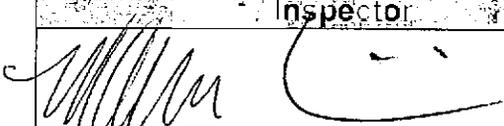
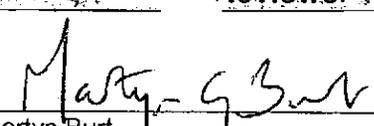
NPDES Compliance Inspection Report

Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
1IN00142*AD	OH0109193	05/08/2008	C	S	

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Rumpke Waste, Inc. Brown County Landfill 9427 Beyers Road Georgetown, Ohio 45121	11:00 am	04/01/2005
	Exit Time	Permit Expiration Date
	12:30 pm	03/31/2010
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
John Hattersley, Site Engineer Jim Hext, Landfill Manager	513.851.0122x3162 937.378.4126x7612	
Name, Address and Title of Responsible Official	Phone Number	
William J. Rumpke, Co-President Rumpke Waste, Inc. 10795 Hughes Road Cincinnati, Ohio 45251	513.851.0122	

Section C: Areas Evaluated During Inspection					
(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
S	Permit	N	Flow Measurement	N	Pretreatment
S	Records/Reports	N	Laboratory	N	Compliance Schedule
N	Operations & Maintenance	S	Effluent/Receiving Waters	N	Self-Monitoring Program
S	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)
See attached letter.

Inspector	Reviewer
 Marianne Piekutowski Division of Surface Water Southwest District Office	 Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office
6/5/08 Date	6/11/08 Date

Sections E thru K: Complete on all inspections as appropriate
Y – Yes, N – No, N/A – Not Applicable, N/E – Not Evaluated

Section E: Permit Verification

Inspection observations verify the permit

- (a) Correct name and mailing address of permittee Y
- (b) Correct name and location of receiving waters..... Y
- (c) Product(s) and production rates conform with permit application (Industries)..... NA
- (d) Flows and loadings conform with NPDES permit..... Y
- (e) Treatment processes are as described in permit application... Y
- (f) New treatment process(es) added since last inspection..... N
- (g) Notification given to State of new, different or increased discharges..... N
- (h) All discharges are permitted..... Y
- (i) Number and location of discharge points are as described in permit..... Y

Comments/Status:

f) Will be relocating pond 002 in 2008 and pond 003 in 2009.
i) NPDES permit was modified for the proposed landfill expansion. Most of the new outfalls will not be discharging in the near future.

Section E: Permit Verification

- (a) Any significant violations since the last inspection..... N
- (b) Permittee is taking actions to resolve violations..... Y
- (c) Permittee has a compliance schedule..... N
- (d) Compliance schedule contained in
- (e) Permittee is meeting compliance schedule..... NA

Comments/Status:

The facility had one pH violation. The facility also had six frequency violations in August 2007. This has been addressed. This will serve as the Notice of Violation for these items.

Section G: Operation & Maintenance

Treatment Works:

Treatment facility properly operated and maintained

- (a) Standby power available.....generator or dual feed NA
- (b) Adequate alarm system available for power or equipment failures.. NA
- (c) All treatment units in service other than backup units..... NA
- (d) Operator holds unexpired license of class required by permit..... NA
Class: I
- (f) Routine and preventative maintenance schedule/performed
on time..... NA
- (g) Any major equipment breakdown since last inspection..... NA
- (h) Operation and maintenance manual provided and maintained..... NA
- (i) Any plant bypasses since last inspection..... NA
- (j) Regulatory agency notified of bypasses..... NA
On MORs and/or Spill Hotline (1-800-282-9378)
- (k) Any hydraulic and/or organic overloads since last inspection..... NA

Collection System:

- (a) Percent combined system: %
- (b) Any collection system overflows since last inspection..... NA
(CSO and/or SSO)
- (c) Regulatory agency notified of overflows (SSOs)..... NA
- (d) CSO O&M plan provided and implemented..... NA
- (e) CSOs monitored and reported in accordance with permit..... NA
- (f) Portable pumps used to relieve system..... NA
- (g) Lift station alarms provided and maintained..... NA
- (h) Are lift stations equipped with permanent standby power
or equivalent..... NA
- (i) Is there an inflow/infiltration problem (separate sewer system),
or were there any major repairs to collection system since
last inspection..... NA
- (j) Any complaints received since last inspection of basement flooding NA
- (k) Are any portions of the sewer system at or near capacity..... NA

Comments/Status:

Section H: Sludge Management

- (a) Sludge management plan (SMP)
Submitted date: Approval #: Not submitted N/A X
- (b) Sludge management plan current..... NA
(c) Sludge adequately disposed..... NA
 (Method:)
(d) If sludge is incinerated, where is ash disposed of
(e) Is sludge disposal contracted..... NA
 (Name:)
(f) Has amount of sludge generated changed significantly since
 last inspection..... NA
(g) Adequate sludge storage provided at plant..... NA
(h) Land application sites monitored and inspected per SMP..... NA
(i) Records kept in accordance with State and Federal law..... NA
(j) Any complaints received in last year regarding sludge..... NA
(k) Is sludge adequately processed (digestion, pathogen control)..... NA

Comments/Status:

Section I: Self-Monitoring Program

Flow Measurement:

- (a) Primary flow measuring device operated and maintained..... NE
Type of device: Ultrasonic & Parshall flume Ultrasonic & Weir Weir
Calculated from influent Other (Specify:)
- (b) Calibration frequency adequate NE
 (Date of last calibration:)
- (c) Secondary instruments operated and maintained..... NE
(d) Flow measurement equipment adequate to handle full range
 of flows..... NE
(e) Actual flow discharged is measured..... NE
(f) Flow measuring equipment inspection frequency
 Daily Weekly monthly other

Comments/Status:

The flow rates are from calculations based on the amount of rainfall.

Section I: Self-Monitoring Program (con't)

Sampling:

- (a) Sampling location(s) are as specified by permit..... Y
- (b) Parameters and sampling frequency agree with permit..... Y
- (c) Permittee uses required sampling method..... Y
- (d) Sample collection procedures are adequate..... Y
 - (i) Samples refrigerated during compositing..... NA
 - (ii) Proper preservation techniques used..... Y
 - (iii) Containers and sample holding times prior to analysis conform with 40 CFR 136.3..... Y
- (e) Monitoring records (i.e., flow, pH, DO) maintained for a minimum of three years including all original strip chart recordings (i.e, continuous monitoring instrumentation, calibration and maintenance records)..... Y
- (f) Adequate records maintained of sampling date, time, location, etc.. Y

Laboratory:

General

- (a) EPA approved analytical testing procedures used (40 CFR 136.3).. Y
 - (b) If alternate analytical procedures are used, proper approval has been obtained..... NA
 - (c) Analyses being performed more frequently than required by permit. N
 - (d) If (c) is yes, are results in permittee's self-monitoring report..... NA
 - (e) Commercial laboratory used..... Y
- Parameters analyzed by commercial lab: **BOD, TSS, NH3, O&G, COD Metals, TDS, Conductivity**

Lab name: **Test America**

Quality Control/Quality Assurance

- (f) Quality assurance manual provided and maintained..... Y
- (g) Satisfactory calibration and maintenance of instruments/equipment. NA
- (h) Adequate records maintained..... Y
- (i) Results of latest USEPA quality assurance performance sampling program: Satisfactory Marginal Unsatisfactory

Date: **Unknown.**

Comments/Status:

Use the contract laboratory's QA/QC manual.

Section J: Effluent/Receiving Water Observations

Outfall Number	Oil sheen	Grease	Turbidity	Visible Foam	Visible Floating Solids	Color	Other
001	No	No	No	No	No	No	No
002	No	No	No	No	No	No	No
003	No	No	No	No	No	No	No

Comments/Status:

All outfalls were clear and free from solids. The two tributaries looked good. It was raining the day of the inspection.

Section K: Multimedia Observations

- (a) Are there indications of sloppy housekeeping or poor maintenance in work and storage areas or laboratories..... N
- (b) Do you notice staining or discoloration of soils, pavement or floors.. N
- (c) Do you notice distressed (unhealthy, discolored, dead) vegetation.. N
- (d) Do you see unidentified dark smoke or dust clouds coming from sources other than smokestacks..... N
- (e) Do you notice any unusual odors or strong chemical smells..... N
- (f) Do you see any open or unmarked drums, unsecured liquids, or damaged containment facilities..... N

If any of the above are observed, ask the following questions:

- (1) What is the cause of the condition?
- (2) Is the observed condition or source a waste product?
- (3) Where is the suspected contaminant normally disposed?
- (4) Is this disposal permitted?
- (5) How long has the condition existed and when did it begin?

Comments/Status:

Permit # 1IN00142*AD
NPDES #: OH0109193