



State of Ohio Environmental Protection Agency

Southwest District Office

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

March 9, 2009

Mr. Ray Lewis
Allied Waste Services
2946 US Route 68 North
Bellefontaine, Ohio 43311

RE: Cherokee Run Landfill Reconnaissance Inspection / Notice of Violation.

Dear Mr. Lewis:

On February 11, 2009 representatives from the Logan County Health Department and Ohio EPA Southwest District Office conducted a Reconnaissance Inspection at the Cherokee Run Landfill, 2946 US Route 68 North, Bellefontaine.

The inspection was conducted as part of the agency's review of the compliance status of the waste water treatment system. A review of final effluent compliance revealed a total of 14 suspended solids violations. The specific outfalls where the violations occurred has been noted.

The findings from the inspection are included in the attached report. There are six items that require a response. Please provide a written response by the dates noted.

If you have any questions regarding the report, I can be contacted at (937) 285-6097.

Sincerely,

Martyn Burt
Compliance Supervisor
Division of Surface Water

Enclosure

cc: Kim Cassady, Logan County Health Department
Chris Jaquet, Allied Waste Services
Monte Bluebaum, Ohio EPA, DSIWM, SWDO
Cheryl Allen, Ohio EPA, DSIWM, SWDO



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NPDES Compliance Inspection Report

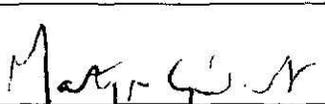
Section A: National Data System Coding					
Permit #	NPDES#	Month/Day/Year	Inspection Type	Inspector	Facility Type
11100125*BD	OH0127191	2/11/2009	R	S	1

Section B: Facility Data		
Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Cherokee Run Landfill 2946 State Route 68 North Bellefontaine, Ohio	10:30 AM	7/1/2007
	Exit Time	Permit Expiration Date
	1:00 PM	6/30/2012
Name(s) and Title(s) of On-Site Representatives	Phone Number(s)	
Ray Lewis, General Manager Chris Jaquet, Environmental Manager Ed O'Brian	(937) 593 - 3566 ext 202 (440) 774 - 4060	
Name, Address and Title of Responsible Official	Phone Number	
Ray Lewis, General Manager 2946 U.S. Route 68 North Bellefontaine, Ohio 43311	(937) 593 - 3566 ext 202	

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
S	Operations & Maintenance	M	Effluent/Receiving Waters	N	Self-Monitoring Program
M	Facility Site Review	N	Sludge Storage/Disposal	N	Other
N	Collection System				

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

See attached report.

Inspector	Reviewer
 3/6/09	 3/6/09
Joe Reynolds Division of Surface Water Southwest District Office	Martyn Burt Compliance & Enforcement Supervisor Division of Surface Water Southwest District Office

Inspection Findings

On Wednesday February 11, 2009 representatives of the Ohio EPA and Logan County Health Department inspected the Cherokee Run Landfill, 2946 State Route 68 North, Bellefontaine, Ohio. Ray Lewis, Ed O'Brian, and Chris Jaquet represented the landfill during the inspection.

At the time of the inspection the storm drainage system was active as a result of recent snow melt and rain. All four sedimentation ponds were discharging.

The west sedimentation basin discharges through outfall 002. This basin collects storm drainage from the lower part of the landfill and from around the leachate storage / evaporation system. This basin has two discharge pipes. The main outfall is a tile (approximately 30") located in the northwest corner of the basin. A high level overflow pipe (12" galvanized) is located towards the southwest corner of the basin. At the time of the inspection the main outfall was discharging at less than one quarter capacity. The high level overflow was discharging over half full. This raises questions concerning the two outlet elevations and possible short circuiting of flows through the basin.

The north sedimentation basin collects drainage from the north side of the landfill and three quarters of the west side of the landfill. The north basin discharges through outfall 001. Most of the west side has been stabilized. The northeast face of the landfill is a working face. There were some areas of erosion on this face. An access road, located just north of the basin, is used to collect water from the basin for dust suppression. A drainage channel location north of the road was eroding slightly. These areas need to be stabilized.

The northeast sedimentation basin collects drainage from the east side of the landfill, south to the south flares. This basin discharges through outfall 004. This drainage comes from the working face of the landfill. At the time of the inspection the basin was overflowing the north embankment. The overflow water was being bypassed through a field tile and across a farm field to the north. This discharge is an unauthorized bypass and is in violation of Part III, item 11 "unauthorized Discharges" of the facility's National Pollutant Discharge Elimination System (NPDES) permit.

Inspection Findings (cont.)

The south sedimentation basin collects drainage from the southeast side of the landfill. This basin discharges through outfall 003. This drainage is from an active face of the landfill. There was a lot of sediment in this basin. This basin reportedly is scheduled for cleaning this summer. Sediment was removed from northeast and west ponds last summer.

On the south side of the landfill there was an area of erosion noted in the channel leading from the old borrow area at the southeast corner of the landfill. The new borrow area located toward the southwest corner of the landfill also was discharging storm flow to the swale that curves past outfall 002. There were no storm water controls in this area. The majority of the storm flow from the new borrow area goes through controls to the southeast of the borrow area.

Between January, 2008 and January 2009 Cherokee Run Landfill reported 14 Total Suspended Solids violation. The violations were as follows: outfall 001 one violation, outfall 002 two violations, outfall 003 four violations, and outfall 004 seven violations.

Response items

1. Cherokee Run Landfill needs to evaluate how the west basin discharge pipes should be operated. What function does the 12" tile serve (effluent discharge, emergency overflow, etc.). Does the current set-up allow for short circuiting of the basin? At what elevation should each pipe discharge? In either case samples must be collected from both outfalls when discharging. If the 12" tile is to serve as a second discharge location (it will discharge before the capacity of the 30" tile is used up) then an outfall number with sampling requirements will need to be assigned. A written follow-up detailing the findings of the investigation and the proposed action (permit as a second outfall, adjust to use as an emergency back-up, or eliminate) must be submitted to this office by no later than May 1, 2009.
2. As noted in this report and in accordance with the facilities Storm Water Pollution Prevention Plan (SWPPP) those areas of exposed soils and erosion need to be stabilized. A written follow-up detailing locations and actions taken to eliminate soil exposures and erosion sources must be submitted to this office by no later than April 6, 2009.

Response items (cont.)

3. The discharge from the north embankment of the northeast sedimentation basin is an unauthorized bypass and must be eliminated as soon as possible. All flow from this basin should be directed through the permitted outfall and into the approved discharge channel. A summary detailing the actions taken / proposed to eliminate future occurrences of this type must be submitted this office by no later than April 6, 2009.
4. A large amount of sediment had accumulated in the south sedimentation basin. The accumulated sediment will need to be removed. A schedule for cleaning the basin must be submitted by no later than April 6, 2009.
5. The areas of erosion noted by the old and new borrow areas (south side of the landfill) need to be stabilized / controlled. A written follow-up detailing the stabilization controls that were used to eliminate this erosion must be submitted by no later than April 6, 2009.
6. Finally the facility SWPPP will need to be updated. The update (just the updated section) need to be submitted to this office by May 1, 2009. This update must address the following:
 - The management certification statement (appendix B) should be updated to reflect the current management status at the facility.
 - The pollution prevention team and their responsibilities should be further defined in the plan.
 - The facility site map must be updated to depict current grading, outfall locations, maintenance facilities, fueling facilities, material exposures, leachate collection / treatment / disposal facilities, and erosion control structures.
 - The inspection sheet (appendix C) should be updated to identify specific locations (i.e. outfalls, active areas, storage areas, etc.) and frequency of inspections.
 - The following areas of the plan should be updated to include specific details: good housekeeping practices, preventative maintenance, spill response, and employee training.