



State of Ohio Environmental Protection Agency

Southeast District Office

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

November 19, 2009

Re: Jefferson County
Crossridge, Inc. Landfill
Self-Monitoring Report Violations
OEPA Permit No. 01N00106*CD
NPDES Permit No. OH0076775
Correspondence (IWW)

Mr. Joseph G. Scugosa
C&D Disposal Technologies, LLC
3250 County Road 26
Wintersville, Ohio 43953

Dear Mr. Scugosa:

On June 8, 2009, I conducted a Compliance Evaluation Inspection at the Crossridge, Inc. Landfill. The purpose of the inspection was to determine the compliance status with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 01N00106*CD. The facility was not discharging during the inspection. I have provided additional comments with regards to Division of Surface Water regulatory issues at C&D Disposal Landfill.

We have received self-monitoring reports covering the months of January 2009 through April 2009 for the Crossridge facility. Our review indicated the following limit violations with respect to your NPDES permit.

Numerical Violations:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	30	410.	1/1/2009
001	00530	Total Suspended Solids	1D Conc	45	410.	1/9/2009
001	00545	Residue, Settleable	1D Conc	0.5	1.3	1/9/2009
001	00530	Total Suspended Solids	30D Conc	30	88.	2/1/2009
001	00530	Total Suspended Solids	1D Conc	45	88.	2/26/2009
001	00545	Residue, Settleable	1D Conc	0.5	3.	2/26/2009

Monitoring Frequency Violations:

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
3/1/2009	001	01330	Odor, Severity	1/Week	1	0
3/1/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/1/2009	001	00056	Flow Rate	1/Week	1	0
3/8/2009	001	01330	Odor, Severity	1/Week	1	0
3/8/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/8/2009	001	00056	Flow Rate	1/Week	1	0
3/15/2009	001	01330	Odor, Severity	1/Week	1	0
3/15/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/15/2009	001	00056	Flow Rate	1/Week	1	0
3/22/2009	001	01330	Odor, Severity	1/Week	1	0
3/22/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/22/2009	001	00056	Flow Rate	1/Week	1	0

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit is cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Permit 01N00106*CD requires the Owner to report noncompliance as directed by Part III.12.E of the permit which shall contain information listed in Part III.12.B and Part III.12.C. The monitoring frequency violations were followed up on in writing in a letter dated April 22, 2009. **We are still awaiting non-compliance notification for the numeric violations shown on page 1.**

Acute Toxicity is to be performed once per year at each outfall along with an upstream monitoring location per the NPDES permit. **Confirm that these tests are being conducted at upstream monitoring location 801.**

The following list of codes is enclosed for use in reporting laboratory results. Please use accordingly.

- AA - Below Detectable Limit
- AB - Analytical Data Lost
- AC - Facility Not Discharging (or No Sludge Hauled)
- AD - Automatic Analyzer Out of Service
- AE - Analytical Data Not Valid
- AF - Sample Site Inaccessible Due to Flooding or Freezing
- AH - Sample Not Taken, Explanation Included
- AJ - Above Range of Automatic Analyzer
- AK - Biological Sample Too Numerous to Count
- AL - No Discharge For the Month
- AN - Sample Not Taken, Plant Not Normally Staffed (Saturdays, Sundays, and Holidays)

More information about eDMR is at: <http://www.epa.state.oh.us/dsw/edmr/eDMR.html>
Outfall 002 at Crossridge was never built. Therefore, the 002 table in NPDES 01N00106*CD can be eliminated with reference to that point source. You may submit a permit modification application to request that the outfall be removed from the permit, or continue to submit monthly reports with the code AL used for Station 002.

The CD&D landfill is currently in operation with one of the four landfill design ponds constructed. **Since the landfill is in operation, the pond at the CD&D landfill needs coverage under an individual NPDES.** The pond is currently covered in an NPDES permit for storm water associated with construction. The outfall monitoring associated with construction sedimentation ponds in the General NPDES is not adequate to provide assurance that leachate and/or onsite contaminants are not contributing pollutants to the outfall.

The Solid Waste plan set showed four ponds associated with the C & D Disposal landfill. The C&D Disposal outfall(s) can either be merged into the Crossridge Inc 01N00106*CD permit if the Owner is the same or can submit for coverage of their own NPDES permit. Crossridge is surrounded by activities underway with the C&D Disposal Landfill and you are reportedly the signing agent for both entities. **Please correspond with your course of action in getting the ponds associated with the C&D Disposal landfill permitted under an individual NPDES. Additionally, include the timeframe of service for each of the landfill design ponds.** Note that the unpermitted discharge of storm water associated with industrial activity subjects you to significant monetary penalties.

Please respond in writing within thirty days to the above highlighted comments. A copy of the inspection report is enclosed. If there are any questions, please contact me at (740) 380-5272.

Sincerely,



Aaron Pennington
Environmental Specialist
Division of Surface Water

AP/dh

Enclosure

c: Aaron Wolfe, DSW, SEDO
c: Dale Warner, DSIWM, SEDO
c: Timothy Stevens, ODNR

NPDES
Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
01N00106*CD	OH0076775	June 8, 2009	C	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Crossridge Landfill Intersection of CR 26 and TWP Rd 174 Cross Creek Township, Jefferson County Ohio	~10:00 A.M.	December 1, 2007
	Exit Time	Permit Expiration Date
	~11:45 A.M.	November 30, 2012

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
Joseph Scugoza, President	(740) 632-3199
Name, Address and Title of Responsible Official	Phone Number
Joseph Scugoza, President C&D Disposal Tech, LLC & Crossridge Inc. 3250 CR 26 Wintersville, Ohio 43953	(740) 632-3199

C. AREAS EVALUATED DURING INSPECTION

<u>U</u> Permit	<u>S</u> Flow Measurement	<u>N</u> Pretreatment
<u>S</u> Records/Reports	<u>N</u> Laboratory	<u>NA</u> Compliance Schedules
<u>U</u> Operations & Maintenance	<u>U</u> Effluent/Receiving Waters	<u>M</u> Self-Monitoring Program
<u>U</u> Facility Site Review	<u> </u> Other	

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated, NA = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached Cover Sheet



Aaron Pennington, Inspector, Ohio EPA, Southeast District Office

11-9-09
Date



Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

11/18/09
Date

E. PERMIT VERIFICATION

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product and production rates conform with permit application			X	
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X ¹		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted		X ²		
i. Number and location of discharge points are as described in permit		X ³		

¹C&D Disposal surrounds the Crossridge Landfill. Management is the same. The CD&D landfill is currently in operation with one of the four landfill design ponds constructed.

²Since the landfill is in operation, the pond at the CD&D landfill needs coverage under an individual NPDES. The pond is currently covered in an NPDES permit for stormwater associated with construction. The outfall monitoring associated with construction sedimentation ponds in the General NPDES is not adequate to provide assurance that leachate and/or onsite contaminants are not contributing pollutants to the outfall.

³Outfall 002 at Crossridge was never built nor will ever be built.

F. COMPLIANCE SCHEDULES/VIOLATIONS

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection (total suspended solids, etc.)	X			
b. Permittee is taking actions to resolve violations		X		
c. Permittee has compliance schedule		X		
d. Compliance schedule contained in:			X	
e. Permittee is meeting compliance schedule			X	

G. OPERATION AND MAINTENANCE

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available:		X		
b. Adequate alarm system available for power or equipment failures			X	
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: Days/Week: <u>M-F 7-4 Sat 7-12 @ CD&D</u>			X	
e. Operator holds unexpired license of class required by permit Class: <u>N/A</u>			X	
f. Routine and preventive maintenance schedule/performed on time		X ¹		
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained				X
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

¹Sediment controls are inadequate with respect to the C&D Disposal activities.

H. SELF-MONITORING PROGRAM

Part 1 - Flow Measurement		Yes	No	N/A	N/E
a.	Primary flow measuring device properly operated & maintained. Type of device: <input type="checkbox"/> ultrasonic & parshall flume <input type="checkbox"/> calculated from influent <input type="checkbox"/> weir <input type="checkbox"/> Other <input type="checkbox"/> ultrasonic & weir <input checked="" type="checkbox"/> Specify: Estimate using weir	X			
b.	Calibration frequency adequate			X	
c.	Secondary instruments (totalizers, recorders etc.) properly operated and maintained			X	
d.	Flow measurement equipment adequate to handle expected ranges of flows			X	
e.	Actual flow discharged is measured	X			
f.	Flow measuring equipment inspection frequency: <input type="checkbox"/> Daily <input checked="" type="checkbox"/> Weekly <input type="checkbox"/> Monthly <input type="checkbox"/> N/A				

Part 2 - Sampling		Yes	No	N/A	N/E
a.	Sampling location(s) are as specified by permit	X			
b.	Parameters and sampling frequency agree with permit (typ.)	X			
c.	Permittee uses required sampling method				X
d.	Sample collection procedures are adequate				X
i.	Samples refrigerated during compositing			X	
ii.	Proper preservation techniques used				X
	Conform with 40 CFR 136.3				X
e.	Monitoring records (e.g., flow, pH, D.O., etc.) maintained for a minimum of three years including all original strip chart recordings (e.g., continuous monitoring instrumentation, calibration, and maintenance records)				X
f.	Adequate records maintained of sampling date, time, exact location, etc.				X

Part 3, Laboratory - General		Yes	No	N/A	N/E
a.	EPA approved analytical testing procedures used (40 CFR 136.3)				X
b.	If alternate analytical procedures are used, proper approval has been obtained				X
c.	Analyses being performed more frequently than required by permit		X		
d.	If (c) is yes, are results reported in permittee's self-monitoring report			X	
e.	Commercial laboratory used 1. Parameters analyzed by commercial lab: 2. Lab name: Tra-Det Inc.	X			

Part 3, Laboratory - Quality Control/Quality Assurance				Yes	No	N/A	N/E
f.	Quality assurance manual provided and maintained						X
g.	Satisfactory calibration and maintenance of instruments and equipment						X
h.	Adequate records maintained						X
i.	Results of latest U.S. EPA quality assurance performance sampling program: Date: <u>Not applicable</u> _____ Satisfactory _____ Marginal _____ Unsatisfactory						

I. EFFLUENT/RECEIVING WATER OBSERVATIONS

Outfall #	Oil Sheen	Grease	Turbidity	Visible Foam	Visible Float Solids	Color	Othe
001	No Discharge						
002	Never Built						
Pond at C&D Disposal Pond	No Discharge						

Receiving stream by rail spur for the CD&D unloading had influence of trash debris and sediment

