



**Environmental
Protection Agency**

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

June 14, 2011

CERTIFIED MAIL

Mr. Timothy Nytra
Allied Waste
11 Boggs Road
P.O. Box 47
Imperial, PA 15126

**RE: Certified Warning Letter: Timeliness of Alternative Timeline Request for Well
CARBE52R; DAPC Facility ID: 02 50 07 0850**

Dear Mr. Nytra:

Carbon Limestone Landfill violated the reporting requirements of New Source Performance Standard, Subpart WWW, permit-to-install (PTI) 02-22526 and DAPC Engineering Guide #78 by submitting an alternative timeline request for well CARBE52R 100 days after the initial well monitoring event that demonstrated the well was out of parameter with the gas oxygen requirement in NSPS, Subpart WWW.

The Alternative Timeline Request was submitted 100 days after the initial exceedance.

On January 6, 2011, well CARBE52R exceeded the 5% oxygen concentration standard established by Subpart WWW, 60.753(c). Subsequent wellhead gas re-monitoring and investigation showed continued high oxygen concentrations and a frozen well pump discharge hose. The well returned to compliance on February 8, 2011. Per the rule, permit and guidance, an Alternative Timeline Request was required to be submitted to this office within 15 days after the initial exceedance, for this well, by January 21, 2011.

By letter dated April 15, 2011, Mr. Curt Holes of Air Quality Specialists on behalf of Carbon Limestone Landfill submitted a retroactive alternative timeline request to return gas extraction well CARBE52R within the operating parameters in NSPS, Subpart WWW, by waiting for the frozen will pump discharge hose to thaw. The ATR was submitted 100 days after the initial exceedance.

Future Alternative Timeline Requests to be submitted within 15 days.

All future alternative timeline requests should be submitted to this office within 15 days of the initial exceedance. Requests can be transmitted by e-mail and should include the results of the initial and any subsequent wellhead monitoring, the results of any investigations to date, and a proposed timeline for future corrective action. As additional information regarding the cause of the exceedance or the proposed corrective actions becomes available, Carbon Limestone is encouraged to supplement the initial ATR as appropriate.

MR. TIMOTHY NYTRA
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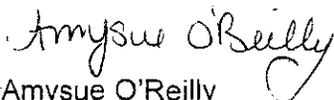
No Additional Action Needed for CARBE52R.

As of February 8, 2011, CARBE52R has returned to compliance with the requirement in NSPS, Subpart WWW, to operate with a wellhead oxygen content less than 5 %. The alternative time line request submitted on April 15, 2011, was approved by this office on May 18, 2011. Therefore, no additional information or action is required for this well.

Be advised that violations of state air pollution regulations are punishable by a civil penalty of \$25,000 per violation. Issuance of this notice does not excuse past violation of federal, state and local laws regarding air pollution. This office reserves the right to pursue violations of air pollution regulations in the form of a referral to Ohio EPA's Central Office.

Should you have any questions concerning this letter, please contact me at (330) 963-1298.

Sincerely,



Amysue O'Reilly
Environmental Specialist
Division of Air Pollution Control

AO:bo

ec: Mike Heher, Carbon Limestone Landfill
Misty Koletich, Ohio EPA, DAPC-NEDO
Erik Bewley, Ohio EPA, DAPC-NEDO
Curt Holes, Air Quality Specialist
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