



**Environmental  
Protection Agency**

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

Re: Inspection Results – NOV  
Lafarge Corporation Landfill  
Paulding County

February 27, 2012

Mr. Ben Fogle, Environmental Manager  
Lafarge Corporation  
P. O. Box 160  
Paulding, Ohio 45879

Dear Mr. Fogle:

On February 6, 2012, I represented the Ohio Environmental Protection Agency (Ohio EPA) and conducted an inspection of the Lafarge Corporation Landfill (Facility) for compliance with the residual waste regulations contained in Chapter 3745-30 of the Ohio Administrative Code (OAC). The Facility is currently classified as a Class III residual waste landfill. You, along with Mr. Neil Elick, represented the Facility during the inspection. The weather at the time of the inspection was clear and cold.

OAC Rule 3745-30-14(E)(9)(a) states in part:

*The owner or operator shall keep a daily log of operation of the facility that contains all the information specified on forms prescribed by the director. . . The owner or operator of the facility may use alternate forms . . . provided that all of the information requested on the prescribed forms is present.*

An administrative survey of the Facility records was conducted. The daily, weekly, and monthly inspection logs for October 31, 2011, through February 5, 2012, were inspected and found to be complete. Relevant comments have been made in the daily log of operations, Form 3. Please continue to ensure all personnel are aware of the importance of completing the inspections and properly completing the log. **Furthermore, Ohio EPA continues to request that all associated documentation (i.e. work orders and pictures) generated as a result of corrective measures and daily operations be included with the respective daily inspection checklist, Form 3. Also, Ohio EPA requests that maps be utilized to identify the daily filling locations within the cell(s), any areas of re-grading, locations of erosion, etc.** The owner/operator has re-started to implement a Facility map to document relevant information since the last inspection. The more relevant documentation the owner/operator generates in addition to the Form 3 checklist, the better understanding of operations Ohio EPA has towards the Facility. In addition, please evaluate the need for continued use of the "Interim CKD Management Plan" (Plan). It appears this Plan is an internal document used in addition to the daily log of operations.

OAC Rule 3745-30-14(J)(1) states in part:

*The owner or operator shall ensure that surface water at a residual solid waste landfill facility is diverted from areas where residual solid waste is being, or has been, deposited. The owner or operator shall ensure that a residual solid waste landfill facility is designed, constructed, maintained, and provided with surface water control structures that control run-on and runoff of surface water. These surface water control structures shall ensure minimal erosion. . .*

It appeared during the inspection that all surface water that comes into contact with CKD is contained within the landfill. Please continue to take actions to shed surface water away from Stage 6 that has not come into contact with CKD (i.e. covered portion of Stage 5A, portion of western slope that has cover, haul road leading into the cell, etc.).

OAC Rule 3745-30-14(B)(2) states in part:

*The owner or operator shall conduct all construction and operation at a residual solid waste landfill facility in strict compliance with the applicable authorizing document(s), including permit(s) to install. . .*

During this inspection continued discussions were held regarding the owner/operator's filling procedure, and whether the owner/operator fills the landfill in accordance with the specifications within the Permit to Install (PTI) #03-9614. According to the PTI issued on July 31, 2003, the owner/operator stated in multiple locations that CKD will be placed in a "step formation" and waste will be placed in a controlled manner in 9 to 12-inch lifts for a minimum annual depth of 5.7 feet. By placing the waste in 9-12-inch lifts for a minimum annual depth of 5.7 feet, the owner/operator indicates that this will "maximize absorption" of the precipitation at the Facility. The owner/operator further states that, "After the waste has been unloaded near the working face, the waste will be spread . . . to construct the CKD bench in 9 to 12-inch lifts." The owner/operator is currently dumping CKD of the back of dump trucks and spreading it with a dozer in Stage 6. The CKD is not currently being placed in a level lift over the entire area of Stage 6 due to an area of ponded water/leachate at the northwest corner of the cell. The owner/operator has made attempts to absorb the leachate with CKD and has pumped out a significant amount of leachate. **The owner/operator of Lafarge Corporation Landfill remains in violation of OAC Rule 3745-30-14(B)(2) for failing to construct and operate the landfill in compliance with the PTI #03-9614.** Please ensure the owner/operator is knowledgeable of all the construction and operating requirements of the PTI. When significant amounts of water (leachate) pool on the waste in Stage 6 it should be pumped out to allow for the proper filling of waste. Furthermore, the owner/operator may need to reevaluate the absorption rate of the CKD, as specified in the PTI or divert additional CKD to the landfill to aid in the absorption of the leachate until the ponded leachate is under control. Please be aware that this violation was first cited in a letter dated August 6, 2010.

As you are aware, there are ongoing communications regarding compliance with the PTI and potential effects surface water run-off is having on the groundwater at the Facility. Attaining full compliance with the PTI may have an effect on the groundwater quality. In addition to the additional intermediate cover the owner/operator has placed on the western slope of Phase 2 to reduce the amount of CKD that is exposed to surface water, please consider further surface water control measures such as seeding the slopes where intermediate cover has been applied.

The owner/operator has been communicating with Ohio EPA over the last several months regarding waste placement issues at the Facility. These issues were addressed during the review of the 2010 annual operational report in a letter dated July 22, 2011. The owner/operator of Lafarge Corporation provided Ohio EPA with an Isopach on February 21, 2012, showing all of the waste as being within the permitted limits at the Facility which abates the violation of OAC Rule 3745-30-14(B)(2). This abatement is detailed in the February 24, 2012, *Partial Return to Compliance Letter* from Ohio EPA.

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According to the PTI, Liquid Collection System Operations Plan, the owner/operator shall maintain a "liquid collection system inspection checklist" on a weekly/monthly/or quarterly basis. In addition, if leachate is deeper than 2-feet in the sump then the sump will be pumped until the leachate is less than 6-inches. Please ensure this checklist is utilized and that the sump is pumped when necessary. The owner/operator has begun using the checklist since the last inspection.

Lafarge must immediately take the necessary measures to return to compliance with Ohio's environmental laws. Documentation should be submitted to this office demonstrating abatement of the existing violation. Please be advised that the violation cited above will continue until the violation has been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Lafarge is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the owner or operator, or others, from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Resource Conservation and Recovery Act, or Comprehensive Environmental Response, Compensation, and Liability Act for remedying conditions resulting from any release of contaminants to the environment.

Please contact me at (419) 373-3079 if you have any questions concerning this inspection.

Sincerely,



Jeremy Scoles, RS  
Environmental Specialist II  
Division of Materials and Waste Management

/l/r

pc: Neil Elick, Production Coordinator., Lafarge  
Tim Weible, Sr. Env'tl Mgr., Lafarge  
DMWM-SW, Paulding County, Lafarge Corporation, Inspections  
DMWM-SW, Paulding County, Lafarge Corporation, Annual Rpt. Correspondence

ec: Abdul Smiley, Mike Reiser  
Brian Gasiorowski, Lafarge Regional Environmental Manager