



**Environmental
Protection Agency**

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

Re: Wyandot County
County Environmental Landfill of Wyandot
Overfill Relocation CCR
Violation

January 11, 2012

Mr. Randy Traub
County Environmental Landfill of Wyandot
11164 County Highway 4
Carey, Ohio 43316-9750

Dear Mr. Traub:

We are in receipt of your submittal dated November 28, 2011 (Report), certifying the waste removal activities at the County Environmental of Wyandot Landfill (Facility) in order to bring the Facility into compliance with the approved waste elevations. The Report was prepared and submitted by Weaver Boos Consultants, on behalf of Republic Services, the owner/operator of the Facility.

Ohio EPA has completed a review of the Report and has the following comments:

1. The existing liner system was damaged at several locations during the waste removal activities. The 60 mil flexible membrane and the geotextile cushion layers were reported to have been repaired; however, the sand leachate collection layer and the geotextile filter layers were not replaced or repaired. This is a **violation** of OAC Rule 3745-27-19(E)(1)(c) since the engineering components were not adequately repaired. Please make the necessary repairs to the sand leachate collection and geotextile filter layers as soon as possible.
2. Please show on a plan drawing the locations of the patches that were used to repair the damaged FML and geotextile cushion layers.
3. Please submit a plan drawing that provides a comparison between the top of waste elevations after the waste relocation activities and the permitted top of waste elevations of the respective phase. This information will be necessary to verify if the overfill violation has been resolved satisfactorily.
4. The Report includes a description about damaging a temporary leachate force main. Please provide more information about this temporary force main (why was it installed, when was it installed, its location, and whether this is the condensate force main? etc.)

5. It was stated in the Report that damage had occurred to a 10-inch gas header during the waste relocation activities. The approved Landfill Gas Collection and Control System Design Plan (GCCP) and construction certification reports indicate that the header should have been 14 inches in diameter. This is a **violation** of OAC Rule 3745-27-19(B) for not conducting all construction in strict compliance with the applicable authorizing documents. Please provide information on why there was a deviation from the approved GCCP, why the deviation was not reported, and how the Facility intends to resolve this violation.

The owner and operator of the Facility needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, the owner and operator of the Facility is requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to habib.kaake@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. (or 3714 for C&DD) 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, the owner and operator of the Facility is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

If you have any questions, please contact me by telephone at (419) 373-3073 or by e-mail at habib.kaake@epa.ohio.gov.

Sincerely,



Habib A. Kaake, Ph.D., P.E., R.S.
Environmental Specialist 3
Division of Solid and Infectious Waste Management

/llr

pc: Jeff Ritchie, Wyandot County Health Department
Jim Adams, Republic Service
Philip Beal, Weaver Boos Consultants
DSIWM-NWDO File: Wyandot County, Wyandot County Landfill, Engineering
ec: Jeremy Scoles, Ohio EPA, DSIWM, NWDO
Habib Kaake, Ohio EPA, DSIWM, NWDDO
Mike Reiser, Ohio EPA, DSIWM, NWDDO