



**Environmental
Protection Agency**

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

Re: Wyandot County
County Environmental Landfill of Wyandot
2011 Landfill Gas System CCR
Notice of Violation Engineering

January 27, 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 August 25, 2011, (Report), certifying the 2011 construction of the landfill gas collection system at the County Environmental Landfill of Wyandot (Facility). The Report was prepared and submitted by Brown and Caldwell, 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 owner/operator is in **violation** of OAC Rule 3745-27-19(B)(1) for not conducting all operations in strict compliance with the approved authorizing documents (Gas Collection and Control System, GCCS Plan) as outlined below:
 - a. The borings for the gas extraction wells were extended to within 10 ft. of the recompacted liner system which conflicts with the 20 ft. separation distance required by the authorizing documents GCCS Plan.
 - b. The gas laterals and headers were bedded with a 6-inch layer of on-site soil or waste. The GCCS Plan indicates that the headers and laterals should be bedded with a clean sand layer with additional sand added to approximately 6" above the crown elevation of the header/lateral pipes.
 - c. The constructed section of the gas extraction system was not performed in accordance with the approved GCCS Plan; specifically, the extraction well locations, layout, sizes of header/lateral pipes, and pipe lengths.
 - d. A self-draining condensate trap that was constructed along the header line was not approved in the GCCS Plan.

- e. The design of the force/airline trench is different from the design that was approved in the GCCS Plan.
2. The construction certification report indicates that a section directly over the liner was excavated to place the perimeter berm header line. The liner system does not appear to have been repaired or brought back to the original condition. Please provide information on the extent of the excavation.
3. The results from the header/lateral pressure testing and the passing requirements used are not included in the construction certification report. Please provide the missing information. Please be advised that OAC Rule 3745-27-08(H), pursuant to OAC Rule 3745-27-19, requires the submittal of the results of all testing performed as part of the quality assurance/quality control tests.
4. Please provide information about the slopes of the different sections of the header and lateral pipes.
5. Please provide the pipe schedule for the 420 ft. long 3-inch by 6-inch diameter HDPE dual force main. Describe if the annular space of the pipe was tested. If so, describe what the pressure that was used for the test.
6. Please revise the plan drawing to show northing and easting coordinates (match lines) consistent with the approved PTI.

The owner/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.

Mr. Randy Traub
January 27, 2012
Page 3

If you have any questions regarding this review, please contact me at (419) 373-3073.

Sincerely,



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

/lir

pc: Jeff Ritchie, Wyandot County Health Department
Jim Adams, Republic Service
Richard Isaac, Brown and Caldwell
DMWM-SW File: Wyandot County, Wyandot County Landfill, Engineering

ec: Jeremy Scoles, Ohio EPA, DMWM, NWDO
Habib Kaake, Ohio EPA, DMWM, NWDO
Mike Reiser, Ohio EPA, DMWM, NWDO