



**Environmental
Protection Agency**

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

Re: Ottawa County
Port Clinton Landfill
2009 Gas System Modification
Notice of Violation

January 23, 2012

Mr. John Logsdon
Republic Services, Inc.
530 North Camp Road
Port Clinton, Ohio 43452

Dear Mr. Logsdon:

The Ohio Environmental Protection Agency (Ohio EPA) has completed a review of the response letter dated November 10, 2010, to an Ohio EPA letter dated September 21, 2010, regarding the "2009 Landfill Gas System Modification at the Port Clinton Landfill" (Report). The Report documents the construction of a portion of the gas extraction system at the North and South Units. The response letter was prepared and submitted by The Mannik & Smith Group, Inc., on behalf of the owner/operator of the Landfill.

Ohio EPA comments in regard to the Report are provided below.

1. Gas extraction wells EW 6, EW 7, and EW 21 were not decommissioned in accordance with the procedure outlined in the approved Gas Collection and Control System Plan (GCCS). The proposed method of decommissioning is not acceptable unless the wells will be placed back in operation in the near future. If these wells will not be brought back into operation soon, they will need to be decommissioned as outlined in the approved GCCS.
2. No information was provided regarding the elevations of the bottom/separatory liner at the locations where EW 7R and EW 21R were drilled. It appears based on the locations of wells EW 7R and EW 21R that it could have penetrated through the separatory liner system. Please schedule a meeting within 14 days of receiving this letter to discuss this issue. Similarly, Ohio EPA comment 4 of the September 21, 2010 letter regarding the disturbance of the drainage layer over the separatory liner will still be outstanding until the issue raised in this comment is satisfactorily resolved.
3. Please submit all revised drawings on 2 ft. by 3 ft. sheets.

4. There appears to be a single cased 2" condensate drain line installed as part of the new flare system. In your response you indicated that this is a condensate line and not a leachate management line. OAC Rule 3745-27-01(L)(1) states that "leachate" means liquid that has come in contact with or been released from solid waste. Hence, condensate management lines are considered leachate management lines and when they are installed outside limits of waste placement must be double lined. Therefore, the owner/operator is in violation of OAC Rule 3745-27-19(B)(1) for not conducting all operation in strict compliance with your approved authorizing documents.

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.

If you have any questions regarding this letter, 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

/llr

pc: James Adams, Republic Services
James Moseley, The Mannik & Smith Group
DMWM-NWDO: File: Ottawa County, Port Clinton Landfill, Engineering

ec: Tyler Madeker, Ohio EPA, DMWM, NWDO
Mike Reiser, Ohio EPA, DMWM, NWDO
Habib Kaake, Ohio EPA, DMWM, NWDO