



**Environmental
Protection Agency**

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

March 2, 2012

Mr. Alvie Green
Noble Road Landfill
170 Noble Road East
Shiloh, Ohio 44878

Re: Noble Road Landfill
2011 Landfill Gas System Construction
Notice of Violation

Dear Mr. Green:

The Ohio Environmental Protection Agency (Ohio EPA) is in receipt of your submittal dated December 27, 2011 (Report), certifying the 2011 construction of the landfill gas collection system at Noble Road Landfill (Facility). The Report was prepared and submitted by North Point Engineering, on behalf of Rumpke of Northern Ohio, Inc.

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

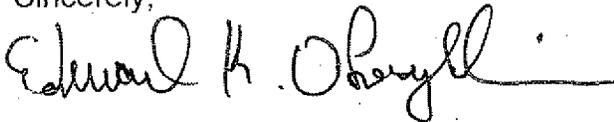
1. The owner/operator is in **violation** of OAC Rule 3745-27-19(B)(1) for not conducting all operations in strict compliance with the approved authorizing documents (Gas Collection and Control System (GCCS Plan), approved May 8, 2009). The boring for gas extraction well 66R was extended to within 9 feet of the recompacted liner system. This conflicts with the 15 foot separation distance which is required by the approved GCCS plan.
2. The gas extraction well detail drawings for each well incorrectly list 20 feet as the distance between bottom of the well boring and top of the liner system.
3. Please describe how the solid lateral pipes were non-destructively tested for leaks.
4. Please describe how the well locations and lateral piping were chosen, since it deviates from the approved GCCS plan. Ohio EPA does acknowledge that the GCCS plan was designed based on a completely filled Noble Road Landfill. Also, please describe how the facility will transition into complying with the final GCCS design. Please be advised that any deviation from the approved plan will need to be communicated to Ohio EPA so the facility will know whether the change will constitute a PTI alteration.

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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 edward.o'loughlin@epa.state.oh.us.

If you have any questions or concerns with any of the comments above, please feel free to contact me at (419) 373-3062.

Sincerely,



Edward K. O'Loughlin
Environmental Specialist 2
Division of Materials and Waste Management

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pc: Ron Zitek, North Point Engineering
Dave Murphy, Rumpke
Andrea Barnes, Richland County Health Department
File: DMWM-SW Richland Co., Noble Road Landfill, Engineering

ec: Tyler Madeker, DMWM-NWDO

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, 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.