



**Environmental
Protection Agency**

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

March 14, 2012

CERTIFIED MAIL

Mr. Larry Riddle
Landfill Manager
Rumpke Sanitary Landfill
Cincinnati, OH 45251

**RE: HAMILTON COUNTY
RUMPKE SANITARY LANDFILL
NOV**

**Subject: Notice of Violation
Failure to Strictly Control Odors**

Dear Mr. Riddle:

On February 24, 2012, Ohio Environmental Protection Agency (Ohio EPA) conducted odor surveillance along public roads surrounding Rumpke Sanitary Landfill. The odor monitoring was performed in response to complaints about odors originating from the landfill, and as part of a routine inspection of the landfill.

OAC Rule 3745-27-19(B)(3) states "The owner or operator shall operate the facility in such a manner that noise, dust, and odors are strictly controlled so as not to cause a nuisance or a health hazard."

When evaluating off-site odors, Ohio EPA uses the odor intensity scale provided in the table below. Odors of an intensity two or above, which are caused by the landfill and are detected beyond the facility boundary, indicate that the operator is failing to strictly control odors.

Level	Descriptor
0	Odor not detectable.
1	Odor present in the air, which activates the sense of smell and the characteristics may or may not be distinguishable and/or definite, but not objectionable in short durations. This is characterized by occasional "whiffs" of odor, but is not persistent.
2	Odor present in the air, which easily activates the sense of smell, is very distinct and clearly distinguishable, tends to be objectionable and/or irritating, and is persistent in the community.
3	Odor present in the air, which is objectionable and causes a person to attempt to avoid it completely.
4	Odor present in the air, which is so strong that it is overpowering and intolerable for any length of time.

As summarized below, Ohio EPA assessed that distinct, definite and clearly detectable odors (odor intensity two or above) were found at the dates, times, and locations noted below.

Date	Time	Location	Intensity
February 24, 2012	9:30a	Dry Ridge and Challenger Way	0
	9:32a	3743 Struble Road	0
	9:35a	Pippin Road and Stout Road	0
	9:38a	Hughes at Breeze Acres	0
	9:40a	10795 Hughes Road	1
	9:44a	10970 Hughes Road	1
	9:46a	11110 Hughes Road	2
	9:48a	11170 Hughes Road	2
	9:50a	11244 Hughes Road	1
	9:51a	Hughes Road and Bank Road	0
	9:52a	Bank Road at Utility Flare	0
	9:52a	Bank Road under US 27	0
	9:53a	10985 Bank Road	0
	9:54a	Old Colerain and Bank Road	0
	9:56a	10741 Colerain	0
	9:59a	Christ TPP Church	0
	10:02a	US 27 and Colerain Ave	0
	10:02a	Struble Road at PM monitoring site	1
	10:16a	3057 Crest	1
	10:25a	11170 Hughes Road	3
	3:10p	3057 Crest	0

The weather at the time of inspection was 48°F, cloudy with strong gusty winds from the west and southwest. While wood smoke odors were noted at the Christ TPP Church and gas plant odors at 10970 Hughes Road, the predominant odor was associated with the area of the landfill affected by the subsurface reaction (Phase V).

Due to the presence of off-site landfill odors, Rumpke has failed to strictly control odors and, therefore, is in violation of Ohio Administrative Code (OAC) Rule 3745-27-19(B)(3).

Ohio EPA expects Rumpke to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, Rumpke is requested to provide documentation to this office of the steps taken to abate the violations cited above. Documentation of the 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 holly.hillyer@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 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, Rumpke is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

ON-SITE INSPECTION:

Following the odor surveillance inspection, Kerri Castlen of Southwest Ohio Air Quality Agency (SWOAQA), Chuck DeJonckheere of Hamilton County Public Health (HCPH), and Carl Mussenden and I of Ohio EPA conducted an on-site inspection of the facility. The purpose of the on-site inspection was to evaluate any sources of odor which may have been contributing to the off-site odors. This inspection was also a follow-up to the February 15, 2012 Notice of Violation (NOV). Additionally HCPH received a complaint that day regarding odors at 3057 Crest Road, which we confirmed.

During our inspection we were accompanied by Brian Huffman and Aaron Abden from Rumpke. We observed the following:

Gas Plant

Getty Synthetic Fuels (GSF) staff informed us that both utility flares, which destroy the gases from Phase V, were off-line due to a power failure at approximately 6:20 a.m. Utility flare 1's generator restarted the flare, however utility flare 2 (temporary flare) had to be manually restarted. During this time, the enclosed combustor at the gas plant was not functioning. GSF staff did not know when the utility flares were restarted and stated that Ted Mullins would have that information. At the time of our inspection, utility flare 1's flame arrestor was being cleaned and serviced, and the Phase V gases were being re-routed to the enclosed combustor. A staff member from GSF is responsible for checking and ensuring that the differential pressure across the flame arrestor is within an acceptable range to identify clogging and subsequent unexpected shut down of the utility flares. Staff stated that the pressure is checked daily and is documented on the Rumpke ftp site.

East Side Lift Station and Phase II Side Slope Riser

We observed the tarp that was in place over the Phase II valve box (Picture 1) and the edges being held down with rocks and sandbags. Aaron showed us the newly installed "Baker" tanks to control odors at the east lift station (Picture 2). The "Baker" tanks are hard piped to the lift station and route the gases from the lift station through three tanks with different media to remove odors. The treated gas is then vented to the atmosphere. We detected minimal odors at the time of inspection. Aaron stated that eventually, it is Rumpke's plan to install a wet scrubber at this lift station to manage any odors.



Picture 2 - Phase II side slope riser and valve box



Picture 1 - East lift station and "Baker" Tanks

Phase V Side Slope Risers

The Phase V side slope risers were covered with a tarp and the mobile odor control truck was stationed at this location and operating. No odors were observed from the location of the risers.



Picture 3 - Phase V side slope risers



Picture 4 - Odor control truck

Phase V OCB and Soil Interface at the Southeastern Boundary

We observed this area and noted strong odors emanating from the soil at this location. Because of strong gusting winds, we were not able to identify a precise source of the odors. However, this area was identified as a source of odors. (Picture 5)



Picture 5 - OCB /soil interface

Phase V, East Side of OCB

We observed that odor control misters had been newly installed along this area. Minimal odors were observed in this area. (Pictures 6&7)



Picture 6 - Odor misting hose along Phase V east side



Picture 7 - odor misting hose along Phase V east side

Northwest Lift Station

Aaron showed us the modification to the Northwest lift station that had been made since our last two visits on February 6 and 15. Rumpke installed a tent over the lift station with approximately 8 odor control spray nozzles. Observation of the operation of this new odor controlled mechanism was hampered by the strong gusting winds (15-32 mph). Aaron stated that Rumpke intends to install a dry scrubber, using wood chips/mulch, at this location to minimize odors. No odors were observed at this location.



Picture 8 - Northwest lift station enclosed by tent and tarps



Picture 9 - Northwest lift station enclosed by tent and tarps

Ohio EPA asked Aaron to provide additional information in an email the following week, on the current and future plans that Rumpke intends to implement to minimize odors at both the Phase II and NW lift station locations.

Cover Soil in West Buttress Construction Area

We observed the cover soil in the location was clean and without waste. No odors were observed.



Picture 10 - West buttress construction area

Working Face

We observed the working face which was being kept smaller than usual due to the high winds. The facility was using wind screens to minimize blowing litter. Any litter observed beyond the screens remained on the landfill and was being picked up by Rumpke staff. We observed minimal odors in this area. (Picture 11)



Picture 11 - Working face with wind screens

If you have any questions regarding this notice, I may be contacted by telephone at (937) 285-6072 or by the email address noted above.

Sincerely,

Holly H. Hillyer
Environmental Specialist
Division of Materials and Waste Management

HHH/tf

cc: R. Jay Roberts, Rumpke

ec: Tim Ingram, Hamilton County Public Health
Chuck DeJonckheere, Hamilton County Public Health
Brad Miller, Southwest Ohio Air Quality Agency
Carl Mussenden, CO-DMWM

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 CINCINNATI, OH 45251

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