



Environmental  
Protection Agency

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

March 27, 2012

Mr. Larry Riddle, Landfill Manager  
Rumpke Sanitary Landfill  
10795 Hughes Road  
Cincinnati, OH 45251

RE: HAMILTON COUNTY  
RUMPKE SANITARY LANDFILL  
NOV

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

Dear Mr. Riddle:

On March 7, 2012, the Ohio Environmental Protection Agency (Ohio EPA) conducted odor surveillance along public roads surrounding Rumpke Sanitary Landfill. The odor monitoring was performed as part of a routine odor 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 offsite 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.

Southwest District Office  
401 East Fifth Street  
Dayton, OH 45402-2911

937 | 285 6357  
937 | 285 6249 (fax)  
www.epa.ohio.gov

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
March 7, 2012	12:26p	Struble Road at PM Monitoring Site	0
	12:27p	3743 Struble Road	0
	12:47p	Pippin Road and Stout Road	0
	12:52p	Hughes at Breeze Acres	0
	12:53p	10795 Hughes Road	0
	12:54p	10970 Hughes Road	1
	12:56p	11110 Hughes Road	0
	12:56p	11170 Hughes Road	0
	12:57p	11244 Hughes Road	2
	12:59p	Hughes Road and Bank Road	1
	1:00p	Bank Road at Utility Flare	0
	1:01p	Bank Road under US 27	0
	1:02p	10985 Bank Road	0
	1:04p	Old Colerain and Bank Road	0
	1:05p	10741 Colerain	0
	1:06p	Christ TPP Church	0
	1:07p	US 27 and Colerain Avenue	0
	1:09p	Dry Ridge and Challenger Way	0

The weather at the time of inspection was 63°F, clear with gusty winds from the south and a barometric pressure of 30.25 inches.

Due to the presence of off-site landfill odors reaching an intensity of two or greater, 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 may include written correspondence, updated policies and/or photographs, as appropriate, and may be submitted via the postal service or electronically to [holly.hillyer@epa.ohio.gov](mailto:holly.hillyer@epa.ohio.gov).

It is imperative that you return the facility to compliance. If there are specific circumstances that delay the abatement of this violation, Rumpke is requested to submit written correspondence to Ohio EPA describing 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, Chuck DeJonckheere of Hamilton County Public Health (HCPH), and I conducted an on-site inspection of the facility. The purpose of the on-site inspection was to evaluate any sources of odor that may have been contributing to the off-site odors.

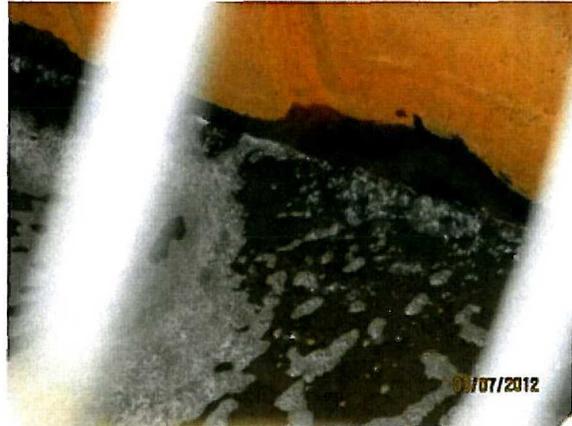
During our inspection we were accompanied by Brian Huffman from Rumpke. We observed the following:

**Gas Plant**

Getty Synthetic Fuels (GSF) staff informed us that gas continues to bubble in the bottom of the concrete pit as gas is escaping the landfill. Mr. Huffman stated that an additional gas extraction well had been installed between the landfill and the gas plant to intercept and remove any migrating gas. At the time of the inspection, this new well was installed but had not yet been connected to the gas collection system. (Pictures 1 & 2).



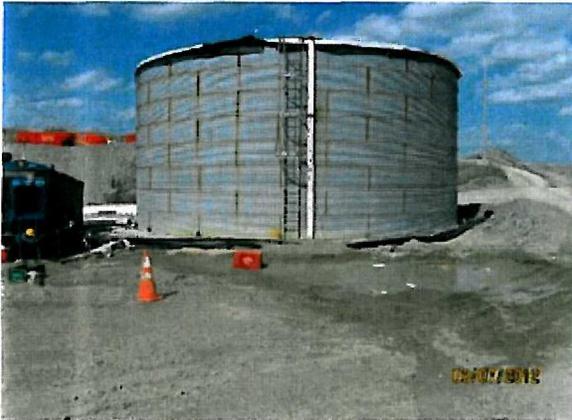
Picture 1



Picture 2

**Leachate Storage Tank**

At the time of our inspection, no trucks were filling in this location. This area remains a concern as a source of odors due to the associated pumping of leachate in open concrete pits. We detected an odor intensity of 1 consisting of leachate. (Pictures 3 & 4)



Picture 3



Picture 4

**Leachate Storage Frac Tanks and Truck Loading Area**

We observed one (1) truck being filled during our inspection. This area remains a concern as a source of odors due to gases escaping from head space in the frac tanks or tanker trailers. We observed an odor intensity of one, consisting of a mixture gas plant and leachate. (Picture 5)



Picture 5

**Phase VI**

We observed this area (Picture 6), and noted strong odors emanating from this location. The odor was identified as Phase V odor. Several temporary leachate outbreak containment structures were observed (Pictures 6, 7 & 8). These structures were lined with liner material and covered by thick plastic held in place with sandbags. No odor was directly noted from the leachate containments unless the plastic cover was removed. Mr. Huffman stated these structures were pumped out regularly by a Vac Truck. No odor control was installed or operating in this area. Because of gusting winds, we were not able to identify a precise source of the odor that was present; however **this area was identified as a source of odors.**



Picture 6



Picture 7



Picture 8

**Areas Previously Noted as Sources of Odors**

The following areas that have previously been noted as sources of odors were observed during the on-site odor inspection and no odors were detected:

- Phase II side slope riser and lift station
- Phase IV side slope riser
- Phase V top of OCB
- Phase V side slope riser
- Northwest lift station
- Soil cover in west buttress construction area

**Blowing Litter**

Due to the gusty winds, a large volume of blowing litter was observed on the landfill and was being picked up by Rumpke staff. No odors were noted in these locations.

HCPH and Ohio EPA held an exit conference call with John Butler and Mr. Huffman to discuss the findings of the on-site and off-site inspection as outlined in this letter. During the conference, Ohio EPA suggested the use of additional odor control at the northern end of the landfill, in the area of Phase VI where the on-site odors were strong. Mr. Butler stated that odor control was not installed in this area due to future construction plans for the location.

If you have any questions regarding this notice, I may be contacted by telephone at (937) 285-6072 or by the email at [holly.hillyer@epa.ohio.gov](mailto:holly.hillyer@epa.ohio.gov).

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

# OHIO EPA/DMWM ODOR SURVEILLANCE FORM

FACILITY NAME: Rumpke Sanitary Landfill

DATE: 3/7/2012

<b>WEATHER CONDITIONS</b>	Clear	Temperature: 63 °F
<b>PRECIPITATION</b>	None	Relative Humidity: 56 %
<b>WIND DIRECTION</b>	S	Barometric Pressure: 30.23 inches Hg
<b>WIND SPEED</b>	5-15 mph	Is there a printout of weather data attached? YES
		What is the source of data? Weather Underground

## ODOR INTENSITY SCALE DESCRIPTORS

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.

ESTIMATED TIME	LOCATION*	ODOR INTENSITY	DESCRIPTORS	COMMENTS
Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.	Click here to enter text.
12:26 p	Struble and PM Monitor	0	Click here to enter text.	Loop data point
12:27 p	3743 Struble Rd	0	Click here to enter text.	Loop data point
12:47 p	Pippin and Strout	0	Click here to enter text.	Loop data point
12:52 p	Hughes at Breezy Acres	0	Click here to enter text.	Loop data point
12:53 p	10795 Hughes Rd	0	Click here to enter text.	Loop data point

ESTIMATED TIME	LOCATION*	ODOR INTENSITY	DESCRIPTORS	COMMENTS
12:54	10970 Hughes Rd	1	Landfill gas	Loop data point
12:56 p	11110 Hughes Rd	0	Click here to enter text.	Loop data point
12:56 p	11170 Hughes Rd	0	Click here to enter text.	Loop data point
12:57 p	11244 Hughes Rd	2	Phase V	Loop data point
12:59 p	Hughes and Bank	1	Phase V	Loop data point
Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.	
Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.	Click here to enter text.
1:00 p	Bank Rd at Utility Flare	0	Click here to enter text.	Loop data point
1:01 p	Bank Rd under US 27	0	Click here to enter text.	Loop data point
1:02 p	10985 Bank Rd	0	Click here to enter text.	Loop data point
1:04 p	Old Coleraine and Bank Rd	0	Click here to enter text.	Loop data point
1:05 p	10741 Coleraine	0	Click here to enter text.	Loop data point
1:06 p	Christ Church	0	Click here to enter text.	Loop data point
1:07 p	US 27 and Coleraine	0	Click here to enter text.	Loop data point
Click here to enter text.	Click here to enter text.	Choose an item.	Click here to enter text.	Click here to enter text.
1:09 p	Dry Ridge and Challenger Way	0	Click here to enter text.	Loop data point

OFF-SITE ODORS DETECTED BY INSPECTOR WERE DETERMINED TO BE EMANATING FROM THE FACILITY

3-7-12	1:15 p	Holly Hillier	Dee Dee
DATE	TIME	INSPECTOR'S NAME (PRINTED)	SIGNATURE

### History for Covington, KY

Wednesday, March 7, 2012

Wednesday, March 7, 2012

« Previous Day

March 7 2012 View

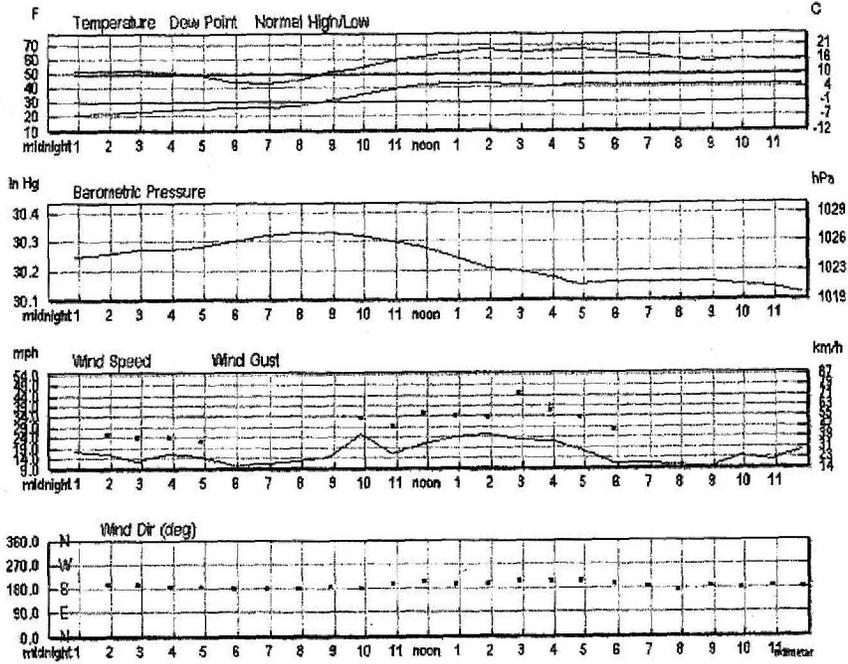
Next Day »

Daily Weekly Monthly Custom

	Actual	Average	Record
Temperature			
Mean Temperature	56 °F	40 °F	
Max Temperature	69 °F	50 °F	79 °F (1974)
Min Temperature	42 °F	31 °F	5 °F (1889)
Degree Days			
Heating Degree Days	9	25	
Month to date heating degree days	163	180	
Since 1 July heating degree days	3478	4015	
Cooling Degree Days	0	0	
Month to date cooling degree days	0	0	
Year to date cooling degree days	0	0	
Growing Degree Days	6 (Base 50)		
Moisture			
Dew Point	36 °F		
Average Humidity	41		
Maximum Humidity	53		
Minimum Humidity	28		
Precipitation			
Precipitation	0.00 in	0.12 in	1.79 in (1933)
Month to date precipitation	0.44	0.77	
Year to date precipitation	7.37	6.58	
Snow			
Snow	0.00 in	0.10 in	7.00 in (2008)
Month to date snowfall	1.4	0.9	
Since 1 July snowfall	5.5	19.5	
Snow Depth	0.00 in		
Sea Level Pressure			
Sea Level Pressure	30.23 in		
Wind			
Wind Speed	16 mph (SSW)		
Max Wind Speed	30 mph		
Max Gust Speed	45 mph		
Visibility	10 miles		
Events			

T = Trace of Precipitation, MM = Missing Value

Source: NWS Daily Summary



Certify This Report

Hourly Observations

Time (EST)	Temp.	Windchill	Dew Point	Humidity	Pressure	Visibility	Wind Dir	Wind Speed	Gust Speed	Precip	Events	Conditions
12:52 AM	63.1 °F	-	21.9 °F	30%	30.25 in	10.0 mi	South	17.3 mph	24.2 mph	N/A		Mostly Cloudy
1:52 AM	63.1 °F	-	23.0 °F	31%	30.26 in	10.0 mi	SSW	16.1 mph	25.3 mph	N/A		Mostly Cloudy
2:52 AM	53.1 °F	-	24.1 °F	32%	30.27 in	10.0 mi	SSW	12.7 mph	24.2 mph	N/A		Overcast
3:52 AM	52.0 °F	-	25.0 °F	35%	30.27 in	10.0 mi	South	16.1 mph	24.2 mph	N/A		Scattered Clouds
4:52 AM	50.0 °F	-	26.1 °F	39%	30.28 in	10.0 mi	South	15.0 mph	21.9 mph	N/A		Partly Cloudy
5:52 AM	45.0 °F	39.7 °F	27.0 °F	49%	30.30 in	10.0 mi	South	10.4 mph	-	N/A		Partly Cloudy
6:52 AM	44.1 °F	38.1 °F	27.0 °F	51%	30.32 in	10.0 mi	South	11.5 mph	-	N/A		Scattered Clouds
7:52 AM	46.0 °F	40.2 °F	28.0 °F	50%	30.33 in	10.0 mi	South	12.7 mph	-	N/A		Scattered Clouds
8:52 AM	52.0 °F	-	32.0 °F	47%	30.33 in	10.0 mi	South	15.0 mph	23.0 mph	N/A		Mostly Cloudy
9:52 AM	55.0 °F	-	36.0 °F	49%	30.32 in	10.0 mi	South	25.3 mph	33.4 mph	N/A		Mostly Cloudy
10:52 AM	60.1 °F	-	39.9 °F	47%	30.30 in	10.0 mi	SSW	16.1 mph	29.9 mph	N/A		Mostly Cloudy
11:52 AM	63.0 °F	-	43.0 °F	48%	30.28 in	10.0 mi	SSW	20.7 mph	35.7 mph	N/A		Scattered Clouds
12:52 PM	66.0 °F	-	44.1 °F	45%	30.25 in	10.0 mi	SSW	24.2 mph	34.5 mph	N/A		Scattered Clouds
1:52 PM	68.0 °F	-	44.1 °F	42%	30.21 in	10.0 mi	SSW	25.3 mph	33.4 mph	N/A		Mostly Cloudy
2:52 PM	66.0 °F	-	43.0 °F	43%	30.20 in	10.0 mi	SSW	23.0 mph	44.8 mph	N/A		Mostly Cloudy

3:52 PM	66.9 °F	-	42.1 °F	40%	30.18 in	10.0 mi	SSW	21.9 mph	36.8 mph	N/A	Mostly Cloudy
4:52 PM	68.0 °F	-	43.0 °F	40%	30.15 in	10.0 mi	SSW	18.4 mph	33.4 mph	N/A	Mostly Cloudy
5:52 PM	66.0 °F	-	43.0 °F	43%	30.16 in	10.0 mi	SSW	11.5 mph	27.6 mph	N/A	Scattered Clouds
6:52 PM	64.0 °F	-	43.0 °F	48%	30.16 in	10.0 mi	South	11.5 mph	-	N/A	Mostly Cloudy
7:52 PM	61.0 °F	-	43.0 °F	52%	30.16 in	10.0 mi	South	10.4 mph	-	N/A	Scattered Clouds
8:52 PM	59.0 °F	-	43.0 °F	55%	30.16 in	10.0 mi	South	9.2 mph	-	N/A	Mostly Cloudy
9:52 PM	61.0 °F	-	43.0 °F	52%	30.15 in	10.0 mi	South	15.0 mph	-	N/A	Overcast
10:52 PM	60.1 °F	-	43.0 °F	53%	30.14 in	10.0 mi	South	12.7 mph	-	N/A	Scattered Clouds
11:52 PM	60.1 °F	-	43.0 °F	53%	30.12 in	10.0 mi	South	17.3 mph	25.3 mph	N/A	Overcast
<a href="#">Show full METARS</a>   <a href="#">METAR FAQ</a>   <a href="#">Comma Delimited File</a>											