



Environmental
Protection Agency

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

March 28, 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 Wednesday, March 14, 2012, Brad Miller from Southwest Ohio Air Quality Agency (SWOAQA), and Joleen Cook from the Ohio Environmental Protection Agency (Ohio EPA) conducted an off-site odor investigation and a subsequent on-site inspection of the Rumpke Sanitary Landfill. The group was escorted on site by John Butler from Rumpke. The weather was 45° F, sunny, with a wind speed of approximately 4 - 7 mph from the south by southwest. The odor monitoring was performed in response to complaints about odors originating from 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 date, time, and location noted below.

Date	Time	Location	Intensity
March 14, 2012	8:50a	Struble Road at PM Monitoring Site	0
		3743 Struble Road	0
		Pippin Road and Stout Road	0
		Hughes at Breeze Acres	0
		10795 Hughes Road	1
		10970 Hughes Road	1
		11110 Hughes Road	1
		11170 Hughes Road	0
		11244 Hughes Road	0
		Hughes Road and Bank Road	0
		Bank Road at Utility Flare	2
		Bank Road under US 27	1
		10985 Bank Road	0
		Old Colerain and Bank Road	0
		10741 Colerain	0
		Christ TPP Church	0
		US 27 and Colerain Avenue	0
9:15a	Dry Ridge and Challenger Way	0	

Due to the presence of off-site landfill odors as indicated in the table above as an odor 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).

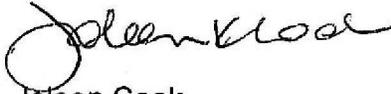
On-site Inspection:

Following the Odor Surveillance Inspection, we 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. During our inspection we were accompanied by John Butler from Rumpke. We observed Chesapeake making repairs to the excavated anchor trench around the Phase VI headwall. This was part of the detail work that was necessary to finish up the installation of the most current odor control blanket deployment. The orchard sprayer was on site spraying odor control. Odor from this activity may have contributed to the odors that were detected off site.

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If you have any questions regarding this notice, I may be contacted by telephone at (937) 285-6071 or by email at joleen.cook@epa.state.oh.us.

Sincerely,

A handwritten signature in black ink that reads "Joleen Cook". The signature is written in a cursive style with a large, circular initial "J".

Joleen Cook
Environmental Specialist
Division of Materials and Waste Management

JC/ff

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