



April 30, 2012

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

RE: HAMILTON COUNTY  
RUMPKE SANITARY LANDFILL  
NOV

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

Dear Mr. Riddle:

On Wednesday, April 24, 2012, Chuck DeJonckheere from Hamilton County Public Health (HCPH), and Holly Hillyer from 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, Brian Huffman, and Larry Riddle from Rumpke, and Brad Miller from Southwest Ohio Air Quality Agency (SWOAQA). The weather was 56° F, sunny, with gusty winds at speeds of approximately 15-20 mph from the west/northwest.

**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
<b>April 24, 2012</b>	12:45 pm	I 247 at Colerain exit	0
	12:50 pm	Struble Road at PM Monitoring Site	0
	15:51 pm	Colerain Lock and Store	0
	12:55 pm	Pottinger and Carlos	1
	1:01 pm	Pippin Road and Stout Road	1
	1:07 pm	Bellbranch	0
	1:14 pm	Hughes at Breeze Acres	0
	1:15 pm	10795 Hughes Road	1
	1:17 pm	10686 Hughes Road	1
	1:20 pm	.8 mile marker between 10795 and 10922 Hughes Road	2
	1:23 pm	10922 Hughes	1
	1:25 pm	10970 Hughes Road	0
	1:26 pm	11110 Hughes Road	0
	1:27 pm	11170 Hughes Road	0
	1:28 pm	11244 Hughes Road	0
	1:28 pm	Hughes Road and Bank Road	0
	1:29 pm	Bank Road at Utility Flare	0
	1:29 pm	Bank Road under US 27	0
	1:30 pm	10985 Bank Road	0
	1:30 pm	Old Colerain and Bank Road	0
	1:31 pm	10741 Colerain	0
	1:32 pm	Christ TPP Church	0
	1:32 pm	US 27 and Colerain Avenue	0
	1:34 pm	Dry Ridge and Challenger Way	0
	1:40 pm	10795 Hughes	1
	1:47 pm	.8 mile marker between 10795 and 10922 Hughes Road	2

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 several areas were identified as sources of odors, however, strong gusty winds made pinpointing locations of all odors difficult.

#### Gas Plant

Very strong odors identified as gas plant odors were observed at this location. Mr. Butler stated that the Tox 5 unit is not operating at full capacity and occasional releases still occur. These were the same odors noted off-site.

#### Leachate Truck Loading Area

Strong leachate odors were observed as a tanker truck was filling up at the time of our inspection. Mr. Riddle and Mr. Butler stated that additional odor control was planned for this location in the near future. SWOAQA and Rumpke personnel noted total VOC levels of 500 ppb and methane levels of 6 ppm.

#### Phase II Side Slope Riser

No odors were noted in this area at the time of our inspection.

#### East Lift Station

Phase V odors were observed in this area. The tarp covering the lift station had a rip at the top and an open area was noted at the back side of the tarp next to the concrete wall.

#### Phase IV Side Slope Riser

No odors were noted in this area at the time of the inspection, however a pool of dark colored leachate was observed beneath the side slope riser.

#### Phase VI and VII

Some leachate odors were noted in this location. Several pools of leachate had been collected and contained in open pits to address the leachate outbreaks in this area. Mr. Butler stated that no automated collection system would work in this area, since the leachate outbreaks were below the toe drain in this location. Rumpke personnel were using a Vac truck to manually remove the leachate, as well as a bubble sucker to remove leachate, under the adjacent OCB. Concerns were raised by HCPH and Ohio EPA regarding containment of the leachate during rain events.

#### Northwest Lift Station

Some Phase V odors were observed in this area. Mr. Butler stated that the new lift station tank was to be connected within the next two weeks.

#### Phase V

Strong Phase V odors were observed at the top of Phase V. Odor control fans and mister were operating.

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Mr. Butler stated that Chesapeake was to be on-site that day to address pinholes in the OCB, damaged boots around gas wells, and pipe penetration activities.

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

Sincerely,



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

Enclosure

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

HHH\bp

# OHIO EPA/DMWM ODOR SURVEILLANCE FORM

FACILITY NAME: Rumpke Sanitary Landfill

DATE: 4/19/2012

WEATHER CONDITIONS	Clear	Temperature: 56 °F
PRECIPITATION	None	Relative Humidity: 25 %
WIND DIRECTION	W	Barometric Pressure: 29.00 inches Hg
WIND SPEED	15+ mph	Is there a printout of weather data attached? YES
	Gusty	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
12:45 p	I 275 and Colerain Exit	0	Click here to enter text.	Click here to enter text.
12:50 p	Struble and PM Monitor	0	Click here to enter text.	Click here to enter text.
12:51 p	Colerain Lock and Store	0	Click here to enter text.	Click here to enter text.
12:55 p	Pottinger and Carlos	1	Phase V	Click here to enter text.
1:01 p	Pippin and Stout	1	Phase V	Click here to enter text.
1:07 p	Bellbranch	0	Click here to enter text.	Complaint

ESTIMATED TIME	LOCATION*	ODOR INTENSITY	DESCRIPTORS	COMMENTS
1:14 p	Hughes at Breezy Acres	0	Click here to enter text.	Click here to enter text.
1:15 p	10795 Hughes Rd	1	Phase V	Click here to enter text.
1:17 p	10686 Hughes Rd	1	Garbage	Click here to enter text.
1:20 p	.08 mile marker between 10795 and 10922 Hughes	2	Phase V and Gas Plant	Click here to enter text.
1:23 p	10922 Hughes	1	Phase V	Click here to enter text.
1:25 p	10970 Hughes	0	Click here to enter text.	
1:26 p	11110 Hughes	0	Click here to enter text.	Click here to enter text.
1:27 p	11170 Hughes	0	Click here to enter text.	Click here to enter text.
1:28 p	11244 Hughes	0	Click here to enter text.	Click here to enter text.
1:28 p	Hughes and Bank	0	Click here to enter text.	Click here to enter text.
1:29 p	Bank at Utility Flares	0	Click here to enter text.	Click here to enter text.
1:29 p	Bank under US 27	0	Click here to enter text.	Click here to enter text.
1:30 p	10985 Bank	0	Click here to enter text.	Click here to enter text.
1:30 p	Old Colerain and Bank	0	Click here to enter text.	Click here to enter text.
1:31 p	10741 Colerain	0	Click here to enter text.	Click here to enter text.
1:32 p	Christ Church	0	Click here to enter text.	Click here to enter text.

