



May 18, 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 Thursday, May 3, 2012, an off-site odor investigation and a subsequent on-site inspection of the Rumpke Sanitary Landfill were conducted by myself and Chuck DeJonckheere from Hamilton County Public Health (HCPH). The group was escorted on the site by Brian Huffman from Rumpke. The weather was 83° F, sunny, with light winds at speeds of approximately 1-5 mph from the west.

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
May 3, 2012	11:44a	US 247 at Colerain exit	0
	12:00p	Hobby Lobby	0
	12:22p	Struble Road at PM Monitoring Site	1
	12:24p	Circle Storage	0
	12:28p	Pippin Road and Stout Road	0
	12:34p	3017 Autumn Ridge	0
	12:41p	Cranbrook and Kettering	0
	12:50p	11970 Kilbride	0
	12:53p	Huntergreen and Kemper	1
	12:56p	Bank and Crest	1
	12:58p	Hughes Road and Bank Road	0
	12:59p	Bank Road at Utility Flare	0
	1:00p	Bank Road under US 27	0
	1:00p	10985 Bank Road	0
	1:01p	Old Colerain and Bank Road	0
	1:02p	10741 Colerain	0
	1:03p	Christ TPP Church	0
	1:04p	US 27 and Colerain Avenue	0
	1:07p	Hughes Road at Breezy Acres	0
	1:10p	10795 Hughes Road	1
	1:12p	10922 Hughes Road	0
	1:12p	10970 Hughes Road	0
	1:13p	11110 Hughes Road	0
	1:13p	11170 Hughes Road	0
	1:15p	11244 Hughes Road	2
	1:20p	11220 Hughes Road	2
	1:21p	11110 Hughes Road	1
	1:43p	11244 and 11220 Hughes	2

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

Phase V

Strong Phase V odors were detected at the top of Phase V. Odor control fans and misters were operating.

East Lift Station

Phase V odors were detected in this area. The tarp covering the lift station had a small tear at the top.

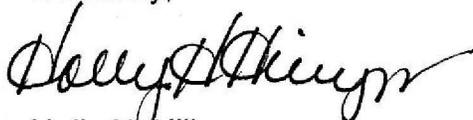
Phase VI and VII

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. Huffman stated that no automated collection system was operating at this time. Rumpke personnel manually remove the leachate using a Vac truck as well as a bubble sucker to remove leachate under the adjacent OCB.

Mr. Huffman stated that Chesapeake was to be on-site that day to address tears in the OCB and damaged boots around gas wells.

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.

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: 5/3/2012

WEATHER CONDITIONS	Clear	Temperature: 83 °F
PRECIPITATION	None	Relative Humidity: 25 %
WIND DIRECTION	W	Barometric Pressure: 30.07 inches Hg
WIND SPEED	1-5 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
11:44 a	US 275 and Colerain Exit	0	Click here to enter text.	Click here to enter text.
12:00 p	Hobby Lobby	0	Click here to enter text.	Click here to enter text.
12:22 p	Struble at PM monitor	1	Garbage/Trash Trucks	Click here to enter text.
12:24 p	Circle Storage	0	Click here to enter text.	Click here to enter text.
12:34 p	3017 Autumn Ridge	0	Click here to enter text.	Complaint
12:41 p	Cranbrook and Kettering	0	Click here to enter text.	Complaint

ESTIMATED TIME	LOCATION*	ODOR INTENSITY	DESCRIPTORS	COMMENTS
12:50 p	11970 Kilbride	0	Click here to enter text.	Complaint
12:53 p	Huntergreen and Kemper	1	Phase V	Click here to enter text.
12:56 p	Bank and Crest	1	Phase V	Click here to enter text.
12:58 p	Hughes and Bank	0	Click here to enter text.	Click here to enter text.
12:59 p	Bank at Utility Flares	0		Click here to enter text.
1:00 p	Bank under US 27	0	Click here to enter text.	
1:00 p	10985 Bank	0	Click here to enter text.	Click here to enter text.
1:01 p	Old Colerain and Bank	0	Click here to enter text.	Click here to enter text.
1:02 p	10741 Colerain	0	Click here to enter text.	Click here to enter text.
1:03 p	Christ Church	0	Click here to enter text.	Click here to enter text.
1:04 p	US 27 and Colerain	0	Click here to enter text.	Click here to enter text.
1:07 p	Hughes at Breezy Acres	0	Click here to enter text.	Click here to enter text.
1:10 p	10795 Hughes	1	Garbage	Click here to enter text.
1:12 p	10922 Hughes	0	Click here to enter text.	Click here to enter text.
1:12 p	10970 Hughes	0	Click here to enter text.	Click here to enter text.
1:13 p	11110 Hughes	0	Click here to enter text.	Click here to enter text.

