



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

Re: Ottawa County
Ottawa County Landfill
Premise # 03 62 01 0118
Notice of Violation/HPV

January 23, 2008

CERTIFIED MAIL
7006 0100 0003 7708 5749

John Logsdon
Ottawa County Landfill
530 North Camp Road
Port Clinton, Ohio 43452

Dear Mr. Logsdon:

The Ottawa County Landfill (OCL) was issued an air permit for the expansion of the landfill along with the roadways and parking area. The permit was issued on September 7, 2004, under PTI # 03-14036. An operational restriction in the terms and conditions of the landfill permit reads as follows:

The permittee shall operate each interior well in the collection system with a landfill gas temperature less than 55 degrees Celsius (131 degrees F.) and with either a nitrogen level less than 20% or an oxygen level less than 5%. If a well exceeds one of these operating parameters, action shall be initiated to correct the exceedance within 5 calendar days. If correction of the exceedance cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedance within 120 days of the initial exceedance. Any attempted corrective measure shall not cause exceedances of other operational or performance standards. An alternative timeline for correcting the exceedance may be submitted to the Northwest District Office.

The permittee may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens.

On June 26, 2007, the OCL submitted a request to the United States Environmental Protection Agency (USEPA) for temperature variances on 15 wells. The landfill asked for the higher operating temperature of 160 degrees F. for those wells. On July 31, 2007 the USEPA denied the request for higher operating temperatures for the following reasons: concern about the structural integrity of the compacted clay and liner system, and that the landfill received aluminum dross waste in the past.

Mr. John Logsdon
January 23, 2008
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According to the third quarter deviation report, several wells continue to exceed 131 degrees F. These temperature deviations are violations of the terms and conditions of PTI #03-14036, the Title V Permit, 40 CFR 60.753(c), and ORC 3704.05. In light of these violations and the denial letter from the USEPA, the Ohio EPA is requesting that the Ottawa County Landfill submit an action plan to resolve the high well temperature issues. Please submit your response to our office by February 25, 2008. In addition, please continue to include a table of all the well head deviations in your quarterly reports.

Please be advised that the submission of the requested information to respond to this letter does not constitute waiver of the Ohio EPA's authority to seek civil penalties pursuant to ORC section 3704.06. The Ohio EPA will make a decision on whether to pursue or decline to pursue such penalties regarding this matter at a later date.

Should you have any questions regarding this letter, please feel free to directly contact me at 419-373-3136.

Sincerely,

Jay P. Liebrecht
Environmental Specialist

/csi

cc: Don Waltermeyer, DAPC-NWDO
Tom Kalman, DAPC, CO
Lisa Holscher, US EPA-Region V
DAPC-NWDO Follow-up File
DAPC-NWDO File

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