



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: Wood County
Evergreen Recycling and Disposal Facility
2625 East Broadway
Northwood, OH 43619
Premise #0387000259
HPF/Notice of Violation (NOV)

Certified Mail

September 9, 2008

Mr. Daniel P. Raezer
Landfill Operations Manager
Evergreen Recycling and Disposal Facility
2625 East Broadway
Northwood, Ohio 43619

Dear Mr. Raezer:

This letter shall serve as a follow-up to the inspection of the above-referenced facility on August 7, 2008. The purpose of the inspection was to determine the compliance status of all air contaminant sources located at this facility. Another site inspection was conducted on August 28th for visible emission observations of the paved roadway at the facility.

Based on discussions with you and Mr. Muhammad Ali during the post-inspection meeting, observations during the inspection on both dates, and a review of the company files at NWDO, the findings can be summarized as follows:

1. Since the last full compliance evaluation, the company has submitted two late reports. Both reports pertain to the soil bioremediation system identified as emissions unit P020. Those reports are due by February 15th (4th quarter), May 15th (1st quarter), August 15th (2nd quarter) and November 15th (3rd quarter). Fourth quarter reporting for year 2006 was dated February 15, 2007 and received on February 22, 2007. The second quarter report for reporting year 2007 was dated August 30th and received on August 31st. The company, having submitted late reports for those two quarters, is in violation of the Additional Terms and Conditions contained in Permit to Install (PTI) #03-7275 issued final on November 17, 1993.
2. It was indicated during the post-inspection meeting that the Title V operating permit issued final on March 31, 2008 did not correctly portray the emission units at the facility.

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3. There have been two emission units that have been removed prior to the finalization of the permit. Those two emission units were the tub grinder (emission unit P005) and the generator (emission unit P002).

The company neglected to submit any information regarding the status of each unit until after the final Title V renewal permit was issued. Two letters received August 22nd do indicate the shutdown status of both emission units with certification from the responsible official. The Title V permit is to be modified to reflect their shutdown the next time it is reopened.

4. Visible emission observations were taken of the paved roadway past the scale house. The observations demonstrated that the facility is in violation of the limitation of 1 minute of visible fugitive emissions during any sixty minute period. The observations lasted for thirteen minutes and the visible fugitive emissions amounted to 1 minute and 6 seconds. Fifteen trucks exited the facility during that period of time. This is a violation of the terms and conditions of PTI #03-13300, issued final on October 5, 2006, and the Title V permit, issued final on March 31, 2008, for paved roadway emission limitation. The company is required to submit a compliance plan detailing the step(s) that will be taken to eliminate future violations.
5. It should be noted that the company has installed a wheel wash system. However, this system does not appear to be utilized very much. This type of additional control would more than likely have reduced the drag-out of dirt onto the paved roadway from the scale house to East Broadway facility entrance that was witnessed on both site visit dates.
6. As discussed during the post-inspection meeting, it would be very beneficial to familiarize yourself with Air Services, the new online system for Title V and synthetic minor facilities. Next year, the facility will be required to submit fee emission reports, compliance certification report, quarterly, semi-annual and annual deviation reports as well as any update to the facility profile. If you require assistance while in this program, please contact me for assistance.

The facility is to submit the required information indicated above by no later than October 17, 2008. Please be advised that the submission of information to respond to this letter does not constitute a waiver of 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.

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Thank you for the courtesy extended during my visit. If you have any questions and/or comments about this letter, please feel free to call me at (419) 373-3118.

Sincerely,



Mohammad Smidi
 Environmental Specialist
 Division of Air Pollution Control

/lb

pc: Don Waltermeyer, DAPC/NWDO
 Lisa Holscher, US EPA Region V
 Samir Araj, DAPC/NWDO
 Tom Kalman, DAPC/CO
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