



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 14, 2007

RE: MAHONING COUNTY
CARBON LIMESTONE LANDFILL
NPDES PERMIT NO. 3IN00192

Mr. Michael Heher
Carbon Limestone Landfill
8100 South Stateline Road
Lowellville, OH 44436

Dear Mr. Heher:

On October 26, 2007, this writer, along with John Schmidt and Katharina Snyder, met with you to conduct a Compliance Evaluation Inspection (CEI) of the storm system for the Carbon Limestone Landfill. The intent of the inspection was to survey the conditions of the ponds and the conveyance systems. The entire circumference of the landfill was toured during this inspection.

The majority of storm water from the site is diverted into Pond 1 (Outfall 001). A portion of the area near the entrance to the office building flows into the Springhouse Pond (Outfall 002), and a small area used to store rolloff boxes (Outfall 003) north of Pond 1 discharges directly to waters of the state.

It was the understanding of this writer that two areas of the landfill drain through areas not permitted by the landfill. The gravel entrance to the truck scale bypasses any permitted outfall and drains across Stymie Road. Storm water from Phase Three is diverted off site to the storm water system operated by Essroc.

At the time of the inspection the area had experienced a precipitation event. Sedimentation Pond 1 was drained and accumulated sediment was being removed. Outfall 001 was discharging storm water. The effluent was light beige indicating the presence of clay particles.

The Springhouse Pond was satisfactory at the time of the inspection. The pond water appeared free of excessive sediment.

No discharge was occurring through outfall 003 at the time of the inspection. The rolloff box area had recently been modified. The top portion of the granular surface was replaced with a new surface layer of gravel material. This was done in response to high levels of mercury measured at Outfall 003. The material removed was placed in the landfill for disposal.

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As discussed, the area used to store the rolloff boxes was constructed on a disposal site for granular material. It is believed that runoff from the area can be directed to an infiltration pond constructed near the site. It is thought that the infiltration pond can eliminate the discharge of storm water runoff to surface water. Be advised that the Carbon Limestone Landfill must continue to sample mercury in storm water from the site to confirm that mercury is not being discharged to ground water in the event the infiltration pond is successful at eliminating any discharge to surface water.

It was the understanding of this writer that storm water from the Phase 3 area is directed to the storm water system maintained and monitored by Essroc. This will be discussed with Essroc during the next inspection of the mining operation. Please notify this writer in the event this is an inaccurate assessment of the storm water system for Phase 3.

At the time of the inspection, a significant amount of sediment runoff was occurring at the entrance to the truck scale. The runoff was originating from the gravel drive to the landfill. Pictures of the runoff are attached. The discharge of sediment is a violation of Ohio Revised Code 6111.04.

The Carbon Limestone Landfill must address this concern. Paving the area will reduce sediment runoff; however, the area must be directed to the Springhouse pond to control any remaining sediment runoff. Paving the area will also control dust during the dry, summer months.

It appears that storm water drainage throughout the landfill has changed since the previous inspection. As described above, it is also understood that portions of the landfill drain off site through unpermitted areas, e.g., the entrance area to the truck scale and from the Phase 3 area. The Carbon Limestone Landfill must maintain an updated Storm Water Pollution Prevention Plan (SWP3). The SWP3 for the landfill must be revised to show all drainage patterns and methods to control off-site sediment transport. The revised SWP3 must be submitted to this office no later than December 31, 2007.

As part of this inspection, Monthly Operating Reports for the period covering October 2006 through September 2007 were reviewed for compliance with the NPDES permit. The following violations were identified for the review period.

Date	Station	Parameter	Limit	Meas. Freq.	Reported Value	Units
Aug. 07	002	TSS	30	30-Day Conc.	55.6	mg/l
8/1/07	002	TSS	45	1-Day Conc.	55.6	mg/l
Sept. 07	001	TSS	30	30-Day Conc.	31.5	mg/l

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In addition, the Carbon Limestone Landfill failed to submit a September 2007 Monthly Operating Report for Outfall 003. In the event there was no discharge through the outfall, a Monthly Operating Report with the "AL" code identifying no discharge for the entire month should be submitted to Ohio EPA at the address identified in Part III, Item 4 of the NPDES permit. If there was a discharge through Outfall 003, Carbon Limestone Landfill must submit analytical results.

You may contact this office at (330) 963-1251 to discuss any questions you may have regarding this inspection report.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

attachments (2)

cc: Mary Helen Smith, Mahoning County Department of Health

ec: John Schmidt, Ohio EPA, DSIWM, NEDO
Katharina Snyder, Ohio EPA, DSIWM, NEDO

File: Industrial/BFI Carbon Limestone/Permits and Compliance

Picture 1. Sediment runoff from gravel drive at Carbon Landfill.



Picture 2. Runoff from Carbon Landfill gravel drive to area on the east side of Stateline Road.

