



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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www.epa.state.oh.us

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

February 29, 2008

RE: LORAIN COUNTY II LANDFILL
PERMIT NO: 3IN00335
LORAIN COUNTY

Mr. Alvie Green
Operations Manager
BFI Lorain County II Landfill
43502 Oberlin-Elyria Rd.
Oberlin, OH 44074

Dear Mr. Green:

On February 27, 2008, a site visit was conducted. The facility was represented by Mr. Richard Heir, Environmental Compliance Assistant and you. The purpose of the inspection was to discuss the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection the following items were noted/discussed:

1. The facility's NPDES total suspended solids permit limits continue to be exceeded at outfalls 3IN000335001 and 3IN00335003.
2. The sedimentation ponds are proposed to be dredged sometime in 2008 to increase detention time and help reduce the concentrations of total suspended solids.
3. Four thousand feet of silt fence was recently purchased. The intent is to install the silt fencing around the perimeter of the landfill to reduce the suspended solids running off the landfill and entering the sedimentation ponds which ultimately discharge through the permitted outfalls. Currently only several hundred feet has been installed due to the winter season.
4. Currently two let down pipes from the landfill discharge into the sedimentation pond near the inlet to the discharge pipe for outfall 3IN000335001. You indicated the current configuration does not allow adequate settling time. Reconfiguration of the inlet to the discharge pipe is being considered. The facility is reviewing relocating the inlet to the discharge pipe further away from the let down pipes and creating an overflow inlet.
5. The south side of the landfill is currently being brought up to final grade. Once final grade is achieved the area will be permanently seeded. It is anticipated to be completed by the end of 2008. You indicated that once this area is permanently seeded this would also help reduce the total suspended solids exceedances from occurring at outfall 3IN000335001.
6. Outfalls 3IN000335001 and 3IN00335003 were not inspected due to heavy snowfall the prior day.
7. Outfall 3IN00335002 has not been constructed yet.

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8. Leachate from the leachate collection system continues to be trucked to the French Creek WWTP.
9. The office has received letters dated August 7, 2007, November 6, 2007, November 27, 2007, and December 24, 2007, notifying this office of the facility's most recent NPDES permit violations along with the corrective actions being taken to eliminate future violations.
10. Mr. Heir was informed that a Web-based application for submitting the monthly operating report is currently available. Web addresses are available below which provide information on this topic along with training dates.
11. The facility's NPDES permit expires on March 31, 2008. Mr. Heir indicated that the facility's renewal application is currently being worked on by STS Consultants and will be submitted in the near future.

This office has recently reviewed your self-monitoring reports covering the period May 1, 2007, through December 31, 2007, for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of noncompliance are as follows:

LIMIT VIOLATIONS

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	30	207.	7/1/2007
001	00530	Total Suspended Solids	1D Conc	45	207.	7/27/2007
001	00530	Total Suspended Solids	30D Conc	30	267.	10/1/2007
001	00530	Total Suspended Solids	1D Conc	45	267.	10/23/2007
001	00530	Total Suspended Solids	30D Conc	30	43.	11/1/2007
003	00530	Total Suspended Solids	30D Conc	30	43.	11/1/2007
003	00530	Total Suspended Solids	30D Conc	30	52.	12/1/2007
001	00530	Total Suspended Solids	30D Conc	30	77.	12/1/2007
003	00530	Total Suspended Solids	1D Conc	45	52.	12/3/2007
001	00530	Total Suspended Solids	1D Conc	45	77.	12/3/2007

No Frequency violations were noted.

Please note that Ohio EPA has converted from the existing **SWIMware** software to a Web-based reporting system, **e-DMR**. The new reporting system is entirely Web based and accessible via any Internet connection. Ohio EPA Form 4500, commonly known as MORs, will now be called Discharge Monitoring Reports (DMRs or e-DMRs). User training is going to be available in early 2008. Please consult the following Web site for updates regarding the specific date:

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMRtraining.html>

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If you need additional information pertaining to the SWIMware replacement e-DMR, consult the following Web site.

<http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>

Please be advised that such instances of noncompliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt