



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.  
Twinsburg, Ohio 44087

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

July 24, 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, Ohio 44074

Dear Mr. Green:

On June 24, 2008, an inspection of the above referenced facility was conducted to obtain and review information for drafting a renewal of the facility's NPDES wastewater permit. The facility was represented by Mr. Richard Heir, Environmental Compliance Assistant. The purpose of the inspection was to: (1) evaluate the facility's compliance status with respect to the terms and conditions of the above-referenced National Pollutant Discharge Elimination System (NPDES) permit and (2) determine required additional actions to be undertaken as part of the permit renewal process.

During the inspection, the following items were noted/discussed:

1. The facility's permit limits for total suspended solids continue to be exceeded at outfalls 3IN00335001 and 3IN00335003.
2. The last inspection letter dated February 29, 2008 indicated that four thousand feet of silt fence had been purchased. The intent was 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. The majority of this silt fencing still has not been installed.
3. The NPDES permit renewal will contain a 6 month schedule of compliance to address the ongoing total suspended solids violations occurring at outfalls 3IN00335001 and 3IN00335003.

Please note that the following changes have been made the facility's current permit:

1. A Schedule of Compliance has been included in the permit directing Lorain County II Landfill to achieve compliance with the final effluent limits at outfalls 3IN00335001 and 3IN00335003.

Mr. Alvie Green  
 BFI, Lorain County II Landfill  
 July 24, 2008  
 Page 2

2. The following parameters were added at outfalls 3IN00335001, 3IN00335002, and 3IN00335003:
  - a. Calcium
  - b. Alkalinity
  - c. Magnesium
  - d. Potassium
  - e. Sodium
  - f. Sulfate
3. Language has been added to the permit which will require additional submittals. Please review Part II, Letters F, G, and H.

This office has recently reviewed your self-monitoring reports covering the period January 1, 2008 through May 31, 2008 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    | 60.            | 1/1/2008       |
| 001     | 00530          | Total Suspended Solids | 1D Conc    | 45    | 60.            | 1/9/2008       |
| 001     | 00530          | Total Suspended Solids | 30D Conc   | 30    | 113.           | 2/1/2008       |
| 001     | 00530          | Total Suspended Solids | 1D Conc    | 45    | 113.           | 2/5/2008       |
| 001     | 00530          | Total Suspended Solids | 30D Conc   | 30    | 52.            | 3/1/2008       |
| 001     | 00530          | Total Suspended Solids | 1D Conc    | 45    | 52.            | 3/4/2008       |
| 001     | 00530          | Total Suspended Solids | 30D Conc   | 30    | 114.           | 4/1/2008       |
| 001     | 00530          | Total Suspended Solids | 1D Conc    | 45    | 114.           | 4/3/2008       |
| 003     | 00530          | Total Suspended Solids | 30D Conc   | 30    | 34.            | 1/1/2008       |
| 003     | 00530          | Total Suspended Solids | 30D Conc   | 30    | 91.            | 2/1/2008       |
| 003     | 00530          | Total Suspended Solids | 1D Conc    | 45    | 91.            | 2/5/2008       |
| 003     | 00530          | Total Suspended Solids | 30D Conc   | 30    | 81.            | 3/1/2008       |
| 003     | 00530          | Total Suspended Solids | 1D Conc    | 45    | 81.            | 3/4/2008       |
| 003     | 00530          | Total Suspended Solids | 30D Conc   | 30    | 62.            | 4/1/2008       |
| 003     | 00530          | Total Suspended Solids | 1D Conc    | 45    | 62.            | 4/4/2008       |

#### Frequency Violations

| Violation Date | Station | Reporting Code | Parameter       | Sample Frequency | Expected | Reported |
|----------------|---------|----------------|-----------------|------------------|----------|----------|
| 4/15/2008      | 001     | 01330          | Odor, Severity  | 1/Week           | 1        | 0        |
| 4/22/2008      | 001     | 00083          | Color, Severity | 1/Week           | 1        | 0        |

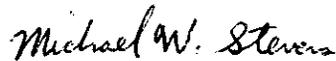
Mr. Alvie Green  
BFI, Lorain County II Landfill  
July 24, 2008  
Page 3

The facility's renewal NPDES has been drafted and will be Public Noticed on July 28, 2008. At this time, you will have a 30 day period to evaluate this permit and comment in writing any concerns you may have.

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

cc: New Russia Township Board of trustees