



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 1, 2007

RE: MAHONING COUNTY
BFI - CLD LANDFILL
NPDES PERMIT NO. 3IN00223

Mr. Michael Heher
Browning-Ferris Industries of Ohio
8100 South Stateline Road
Lowellville, OH 44436

Dear Mr. Heher:

On October 24, 2007, this writer met with you to conduct an inspection of the BFI CLD Construction and Demolition Debris Landfill. The intent of the inspection was to identify operations of the facility relative to the National Pollutant Discharge Elimination System (NPDES) permit. BFI was also represented by Tim Nytra and Tim Sturm. Dave Fetchko represented the Mahoning County Department of Health, and John Schmidt and Katharina Snyder represented the Ohio EPA Division of Solid and Infectious Waste Management (DSIWM) during the inspection.

Observations

The inspection concentrated in the northwest area of the landfill. The area of the landfill was recently closed with a new cap system. The cap was seeded and mulched at the time of the inspection. An area of the landfill south of the recently capped area is to be permanently closed and a new cap constructed sometime in 2008.

It was a concern of this writer that the northwest corner of the landfill had no sediment control structures in place and the area drains through an eroded ditch. The remaining portions of the landfill appear to drain to existing sediment ponds which have permitted outfalls in the NPDES permit.

The three existing sediment ponds were satisfactory during the inspection. No heavy accumulation of sediment was identified in the ponds. The outfall structures and trash racks were all satisfactory during the inspection.

Necessary Actions

As discussed during the inspection, the northwest corner of the landfill needs to be modified to prevent further erosion of the area. It was agreed that BFI will submit to this office a plan to modify the area to control sediment runoff. Options discussed during the

inspection included modifying the topography to reduce the slope gradients of the area, seeding and mulching where necessary, and the installation of structures to reduce the energy of the runoff through the area. The plan must provide details regarding the topography of the drainage area, the design of any sediment control structures, and the final outfall design. The plan must also include a schedule for completing the proposed actions.

It was also agreed that BFI will submit a Storm Water Pollution Protection Plan (SWP3) for the landfill. The SWP3 must include the drainage patterns for the landfill and the method of controlling sediment runoff from the entire landfill. The SWP3 must also identify mechanisms that will be used to control sediment runoff during the construction of the cap in the areas remaining to be permanently closed. Finally, the SWP3 must identify the drainage pattern for the rolloff box storage area(s) of the landfill. Other pertinent information demonstrating storm water and sediment control structures must be included in the SWP3. The plan to address erosion and sediment control in the northwest area of the landfill can be incorporated into the SWP3.

Compliance Review

The Monthly Operating Reports for the landfill were reviewed for compliance with the NPDES permit. Following are violations identified during the review period covering October 2006 through September 2007.

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
Oct 2006	002	Total Suspended Solids	30D Conc.	30	33.5	10/1/2006
Nov 2006	003	Solids, Dissolved-Sum	30D Conc.	1500	1600.	11/1/2006
Dec 2006	002	Total Suspended Solids	30D Conc.	30	42.4	12/1/2006
Dec 2006	003	Solids, Dissolved-Sum	30D Conc.	1500	1849.	12/1/2006
Jan 2007	003	Solids, Dissolved-Sum	30D Conc.	1500	1832.	1/1/2007
Mar 2007	003	Solids, Dissolved-Sum	30D Conc.	1500	1624.	3/1/2007
Apr 2007	003	Solids, Dissolved-Sum	30D Conc.	1500	2063.	4/1/2007
Jun 2007	003	Solids, Dissolved-Sum	30D Conc.	1500	2168.	6/1/2007
Jul 2007	003	Solids, Dissolved-Sum	30D Conc.	1500	2334.	7/1/2007
Aug 2007	002	Total Suspended Solids	1D Conc.	45	54.	8/23/2007
Aug 2007	002	Total Suspended Solids	30D Conc.	30	54.	8/1/2007

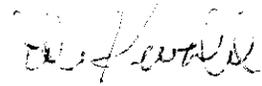
Be advised that violations of the NPDES permit constitute violations of Ohio Revised Code 6111.07. The violations for TDS have been addressed in the renewed NPDES permit. High ammonia levels in the effluent from Pond 3 will be addressed through installation of a treatment system in accordance with a compliance schedule in the NPDES permit. BFI plans to submit a permit modification request to modify the

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schedule currently in the NPDES permit. As discussed, the SWP3 and storm water requirements will be incorporated into the NPDES permit at the time the schedule is modified. The modification request, the SWP3 and the plan to control sediment erosion at the northwest corner of the landfill should be submitted together. The three documents should be submitted to this office no later than December 31, 2007.

You may contact this writer at (330) 963-1251 to discuss any questions you may have.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

JK/mt

cc: Dave Fetchko, Mahoning County Department of Health

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