



State of Ohio Environmental Protection Agency

Northeast District Office

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

May 7, 2009

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 March 26, 2009, this writer conducted an unannounced Compliance Evaluation Inspection (CEI) of the storm water control system for the Carbon Limestone Landfill. The intent of the inspection was to survey the conditions of the pond and the conveyance systems. The entire circumference of the landfill was toured during this inspection.

Observations

At the time of the inspection the area had experienced a moderate precipitation event. Sedimentation Pond 1 (001) was discharging storm water. The Springhouse Pond (002) was also discharging wastewater. Outfall 003 near the roll off boxes was not discharging during the inspection. An infiltration pond was excavated adjacent to the roll off boxes in order to infiltrate the runoff into the mine spoil that underlies the area. Following are observations at the three outfalls.

The discharge from outfall 001 was slightly turbid at the time of the inspection. At the time of the 2008 inspection, the storm water pond was drained for maintenance, and storm water was discharging from the pond untreated. At the time of this most recent inspection, the pond was back in service.

Since the previous inspection, a diversion berm was constructed at the drive entrance to divert storm water runoff through a sediment trap to the Springhouse Pond. The sediment trap was not discharging over the berm at the time of the inspection. However, the Springhouse Pond was unsatisfactory at the time of the inspection. Water quality in the Springhouse Pond was being impacted by storm water runoff from the access road. The runoff was transporting sediment to the pond at the final outfall. A picture of the event is attached to this letter. The impact on water quality from the road runoff is unsatisfactory and should be addressed.

No discharge was occurring through outfall 003 at the time of the inspection. Runoff had been redirected to an infiltration pond. The runoff infiltrates into the mine spoil that underlies the area. As discussed in the 2008 inspection letter, 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. If the Carbon Limestone Landfill can demonstrate that mercury is no longer present in the runoff, the outfall can be eliminated with renewal of the NPDES permit.

At the time of the inspection, a significant amount of trash was evident at the recycling area and at the sediment pond. Pictures taken at both locations are attached to this letter. The trash must be immediately removed from the pond. The pond is only permitted to discharge

Mr. Michael Heher
Carbon Limestone Landfill
May 7, 2009
Page 2

uncontaminated storm water runoff. Permitting the discharge of solid waste into and from the pond would constitute a violation of the NPDES Permit. The issue regarding litter at the site is being referred to the Mahoning County Department of Health.

Solidification Pit

An inspection of the solidification pit was conducted during this inspection. In the past, it was the understanding of this writer that runoff from the solidification pit was contained and treated in the pit for disposal in the landfill. However, during this most recent inspection, it was evident that runoff from the solidification pit area discharges to the sedimentation basin. Be advised that runoff from the solidification pit area is considered leachate. Per OAC 3745-27-19(K)(5), all leachate shall be treated and disposed of in accordance with ORC 6111. Since the NPDES Permit is intended only for the discharge of uncontaminated storm water, the discharge of leachate through the storm water basin constitutes a violation of ORC 6111.

Procedures for storage and disposal of the runoff from the solidification pit must be modified to ensure that none of the runoff discharges into the basin. A response to this letter must be provided indicating the actions that will be taken to divert the leachate away from the storm water management system and to provide proper storage and disposal of the waste.

Compliance Review

As part of this inspection, Monthly Operating Reports for the period covering October 2007 through March 2009 were reviewed for compliance with the NPDES Permit. The following violations of the NPDES Permit were identified for the review period.

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
December 2008	001	Total Suspended Solids	1D Conc	45	66.	12/17/2008
December 2008	001	Total Suspended Solids	30D Conc	30	66.	12/1/2008
September 2008	001	Total Suspended Solids	1D Conc	45	198.	9/17/2008
September 2008	001	Total Suspended Solids	30D Conc	30	198.	9/1/2008
October 2007	001	Total Suspended Solids	1D Conc	45	138.4	10/23/2007
October 2007	001	Total Suspended Solids	30D Conc	30	138.4	10/1/2007

Sedimentation Basin

The current design of the sedimentation basin includes only one, large settling pool. Storm water flows into the basin from two locations. The size of the single pool makes removing sediment a difficult and time consuming task which extends the time that the basin is out of service. This office currently requires that any proposal for a new storm water basin include construction of a forebay ahead of the basins. Removal of sediment from the forebay is much easier than from much larger sedimentation basins. The construction of a forebay also reduces the frequency of taking the sedimentation basin out of service for maintenance. Properly designed forebays also have been reported to improve the quality of storm water discharged from the sedimentation basin.

Mr. Michael Heher
Carbon Limestone Landfill
May 7, 2009
Page 3

A second concern regarding the use of one large sedimentation basin is in regards to leachate entering the basin. At other locations where leachate outbreaks have migrated to sedimentation basins, the entire contents of the basin were considered leachate and prohibited from being discharged to waters of the state. In those instances, the contents of the basins had to be removed for proper disposal. The large, single basin at Carbon Limestone Landfill could be very problematic in such a scenario.

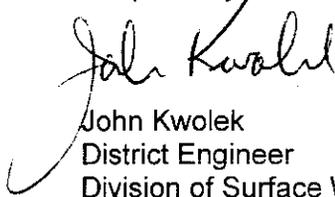
It is recommended that the Carbon Limestone Landfill initiate design and construction of a reconfigured sedimentation system by splitting the one large pond into two, and constructing properly designed forebays at the head of the basins. Such a reconfiguration will reduce maintenance time and costs, and will improve effluent quality.

Company Response

Your response to this inspection report should provide your considerations for the reconfigured sedimentation system along with a description of the actions that will be taken to properly contain and dispose of leachate from the solidification pit area. The response should be provided to this office within 30 days of receipt of this letter.

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

File: Industrial/BFI Carbon Limestone/Permits and Compliance

Picture 1. Sediment runoff from gravel drive to the Springhouse Pond



Picture 2. Trash in the south end of the sedimentation Basin



Picture 3. Trash at the recycling station.

