



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

November 2, 2007

RE: COUNTYWIDE RECYCLING AND DISPOSAL
3IN00139*FD
STARK COUNTY

Mr. Jim Steigerwald
Countywide Recycling and Disposal Facility
Environmental Specialist
3619 Gracemont Street SW
East Sparta, OH 44626

Dear Mr. Steigerwald:

On October 30, 2007, this writer conducted a compliance evaluation inspection of your facility. The inspection was prompted by the foaming incident experienced on or before October 23, 2007. In summary, a large amount of foam was discharged from sedimentation basin 1A outfall 002 on October 23, 2007. The foam was reported by Josh Adams (DSIWM-NE) during his daily inspection of the landfill. Numerous pictures were taken and forwarded to this writer. Pertinent pictures are attached. The suspected source of the foam is the odor agent used by Countywide on a 24/7 basis. A long dry spell followed by intense rainfall on October 23, 2007, may have washed accumulated odor agent into the drainage ways and subsequently into the sedimentation basin. The foam dissipated in sedimentation basin 1A but re-appeared after the discharge flowed through the rip rap in the effluent channel. This foam was extensive and eventually entered Bear Run via an unnamed tributary.

Countywide Landfill is in noncompliance with NPDES Permit 3IN00139 Part III, Section 2 Item B for discharging foam to waters of the state. We have received your written response to Ohio EPA, NEDO, as required within 5 days.

Samples were taken of the outfall 002 discharge and the odor agent by Countywide on October 25, 2007, for analysis and confirmation. Results are expected by mid November 2007. Bart Ray (SIU-NE) sampled outfall 002 on October 26, 2007. Results are expected in the third week of November 2007. Out of four sedimentation basin discharges at Countywide, only outfall 002 experienced this event. Countywide has shut down sections of the odor control application that are tributary to sedimentation basin 1A.

NPDES Outfalls and Observations (pictures attached)

Outfall 3IN00139001: Sedimentation basin 1 discharges from this outfall. At the time of the inspection it was not flowing.

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Outfall 3IN00139002: Sedimentation basin 1A discharges from this outfall. This is the outfall which discharged storm water which produced the foam described above. At the time of the inspection it was flowing clear at approximately 10 gpm. It was not producing any substantial amounts of foam.

Both outfalls 001 and 002 combine and flow to the southeast down the hillside where it enters an unnamed tributary to Bear Run and eventually Sandy Creek.

Outfall 3IN00139003: Sedimentation basin 2 discharges from this outfall. It was discharging at approximately 15 gpm. As noted in previous inspections the discharge water was clear and no visual problems were noted.

Outfall 3IN00139008: Sedimentation basin 3 discharges from this outfall. At the time of the inspection, barely a trickle of water was being discharged. No visual problems were noted.

Both outfalls 003 and 008 enter unnamed tributary to the Tuscarawas River located to the south.

Outfall 3IN00139009 (new in draft permit): We reviewed an existing sedimentation basin located in the drainage basin tributary to this new outfall which discharges to the Gracemont Road ditch. It has been dredged to provide additional capacity for storm water produced from the daily cover and clay storage stockpile areas. It does not have a constructed outlet. We request that you provide discussion as to why this basin was constructed in this manner. No visual problems were noted with this outfall which was observed after this writer left your facility.

We also inspected the wheel wash area. Noted were the improvements to capture runoff from overspray and drippage from the trucks as they exit the wash area. You indicated that the exit ramp will be re-graded and extended to capture more water before it can accumulate and enter the landfill access road ditch. In reviewing the wheel wash recycle ponds, it was again suggested to you that the ponds be dredged to ensure adequate capacity. This was first noted in our May 9, 2007 inspection.

Please be advised that measures must be taken to continually maintain the storm water controls such as check dams, establishing vegetative cover wherever possible, and limestone rip rap in drainage channels. Also, we will remind Countywide Landfill to maintain at all times pH adjustment controls, at all times of the year.

A review of your compliance history as identified by our SWIMS tracking system for the time period of February 2007 through September 2007 revealed the following exceedance of the effluent limitations contained in NPDES permit 3IN00139*FD:

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Station	Parameter	Limit Type	Limit	Reported Value	Exceedance Date
002	pH	1D Conc	6.5	6.2	2/28/2007

Additionally, our tracking system has identified numerous non-reporting frequency events for the same time frame. Looking at your 4500 reports it appears that you are meeting the intent for the reporting requirements but are not completing the report correctly. Therefore, false positives are being generated. If you do not take a sample for an entire month due to no flow at the outfall, insert the AH code on the 28th for the weekly/monthly parameters affected. Please review your records for the time period of at least February 2007 through September 2007. Make corrections as necessary and re-submit the data.

If you should have any questions concerning any of the above, feel free to contact this writer at (330) 963-1136.

Sincerely,

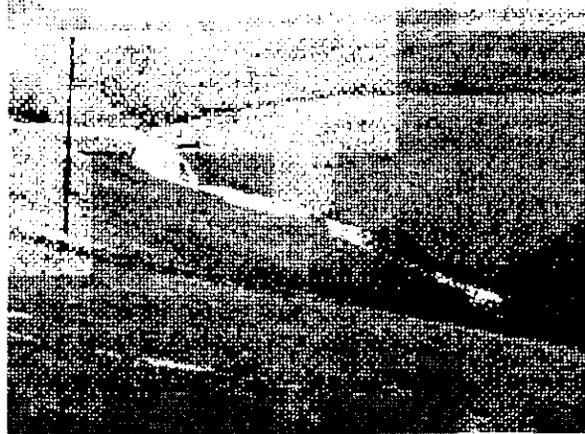
Philip P. Rhodes, P. E.
Environmental Engineer
Division of Surface Water

PPR/mt

attachments

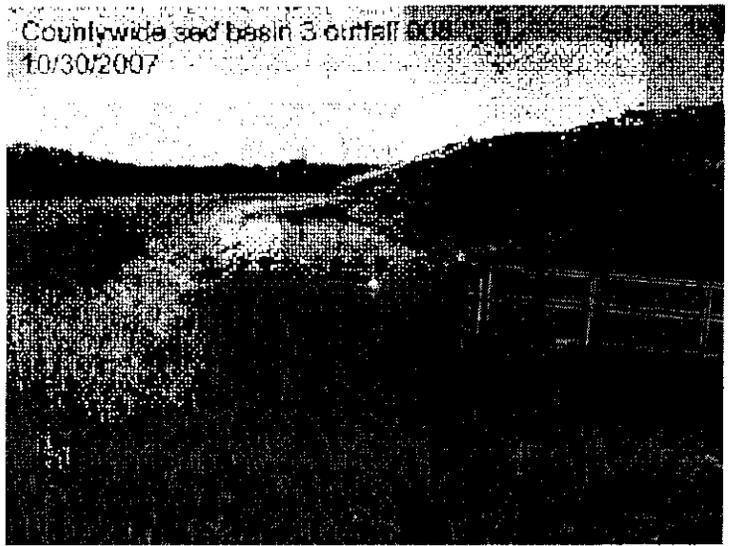
File: Industrial Permit/Compliance

Foam coming off hillside



Foam in waters of the state



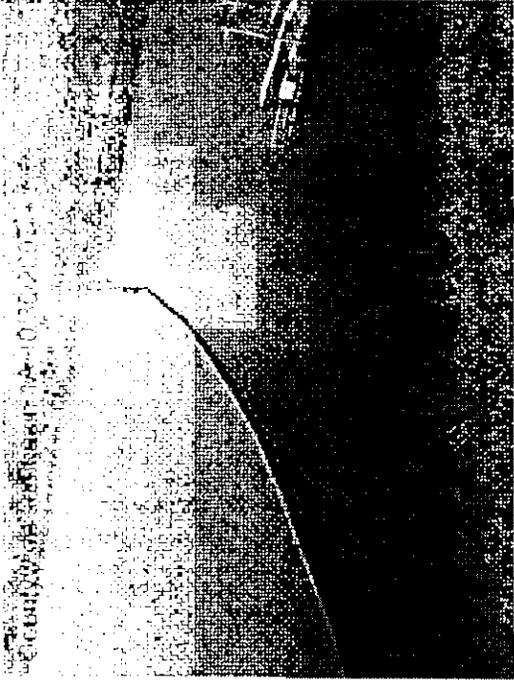


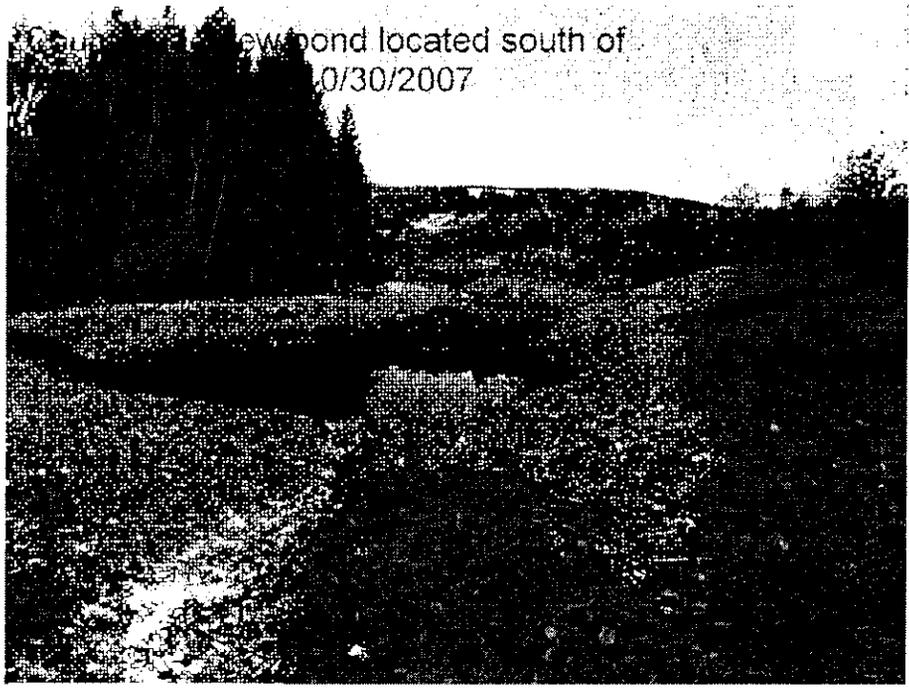
Countywide outfall 005 10/30/2007



Countywide sed basin 1 outfall 002
10/30/2007







Small pond located south of
10/30/2007



Countywide Recycling & Disposal Facility

Division of Republic Waste Services of Ohio
3619 Gracemont Street S.W.
East Sparta, Ohio 44626
Phone: 330-874-3855
Fax: 330-874-2426

TRANSMITTED ELECTRONICALLY

Oct 26, 2007

Mr. Phil Rhodes
Ohio EPA, Northeast District Office
Division of Surface Water
2110 East Aurora Road
Twinsburg, OH 44087

RECEIVED

OCT 29 2007

OHIO EPA NEDO

RE: Noncompliance Notification

Mr. Rhodes:

As a follow-up to our telephone conversation of Oct 25, 2007, Countywide Recycling and Disposal Facility (CWRDF) is submitting this letter in accordance with Part III, Section 12, Item C, General Conditions of N.P.D.E.S. Permit #3IN000139*FD. This section requires CWRDF to notify the Ohio EPA (OEPA) of any exceedance of the permit requirements. The nature of the exceedance is referenced and identified in Part III, Section 2 Item B of the General Conditions of the Permit which states "The effluent shall at all times be free of substances: B) Of an oily, greasy, or surface-active nature, and other floating debris, in amounts that will form noticeable accumulations of scum, foam or sheen". This letter is the required follow-up written notification of CWRDF's 24-hour telephonic notification of October 24, 2007, that an exceedance occurred, which is referenced and identified in Part III, Section 12, Item A.1.

Listed below is the data required by Part III, Section 12, Item C.1-6.

1. Part III, Section 2, Item B;
2. Effluent from Outfall 002 contained an accumulation of foam;
3. The suspected cause of the exceedance are the products used in CWRDF's Odor Control System which was installed as a result of a licensing condition issued by the Stark County Health Department in 2003 for license year 2004 and a citation from the Canton City Health Department Division of Air Pollution Control for Public Nuisance Violation;
4. The exceedance was first observed on October 24, 2007, and subsided on October 26, 2007;
5. Anticipated time of exceedance 24-72 hours;
6. These efforts include the following: Sections of the odor control system that are located directly over or in near proximity to surface water conveyance structures have been shutdown to prevent the odor neutralizing product residual from coating the rip rap in the downchute channels leading to the ponds.

CWRDF will continue to evaluate additional sources, which may have contributed to this occurrence to minimize and/or eliminate the potential for a reoccurrence.

Additionally, during our phone conversation on the 25th we discussed your earlier email from 24 Oct07, in which you instructed CWRDF to sample all 4 outfalls. After discussing this further it was decided that sampling of all 4 outfalls would not be necessary. Per your instructions CWRDF has obtained and shipped the following samples for analysis to Severn Trent Laboratories, in Buffalo, NY.

Sample #1:

Pond 1A, Outfall 002 was sampled on October 25, 2007. This sample will be analyzed for the following parameters as you requested.

- pH
- Spec Conductance
- BOD
- COD
- TSS
- TOC
- TDS
- Oil/Grease
- Phosphorous
- Methyl Blue Active Substances (MBAS)

Samples #2 & #3:

Aliquots of Product #SL-4000 and Product #SL-5000 were sent to the lab on October 25, 2007. These samples will be analyzed for the following parameters as you requested.

- GC/MS (Fingerprint analysis)
- BNA
- VOCs

The parameters identified during the fingerprint analysis of the product samples will be added to the list of parameters for the sample analysis of Outfall 002.

Please contact me should you have additional questions or require additional information regarding these requests.

Sincerely,



Jim Steigerwald
Environmental Technician
Countywide Recycling and Disposal Facility

cc: Tim Vandersall
Stark County Health Department

TMV / TKH/ jrs

File: Binder #11, Correspondence File OEPA NOVs