



State of Ohio Environmental Protection Agency

Northeast District Office

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

October 16, 2007

RE: MAHONING COUNTY
CENTRAL WASTE, INC.
12003 OYSTER ROAD
NPDES PERMIT NO. 3IN00313

Mr. John Hartings
Central Waste, Inc.
12003 Oyster Road
Alliance, OH 44601

Dear Mr. Hartings:

On October 15, 2007, this writer conducted a Compliance Evaluation Inspection (CEI) of the Central Waste, Inc. facility. The intent of the inspection was to evaluate the site for compliance with the National Pollutant Discharge Elimination System (NPDES) permit.

Site Observations

Sedimentation Ponds

During the inspection, two sedimentation ponds were used to control the discharge of sediment from the areas inside the limits of waste placement. The old south sedimentation pond (Pond 001) was eliminated since the previous inspection on October 20, 2006. A new sedimentation basin was constructed south of the abandoned basin. The abandoned basin was regulated in the NPDES permit as Outfall 001, and the new south basin is regulated as Outfall 003. No discharge through Outfall 003 was occurring at the time of this most recent inspection.

The existing north sedimentation basin remains in service and is regulated by Outfall 002 in the NPDES permit. No water was identified in the north sedimentation pond at the time of the inspection. It was the understanding of this writer that the existing north basin will be eliminated and replaced with a new basin (Outfall 004) within the next 12 months.

Areas Outside the Limits of Waste Placement

The sedimentation ponds are intended to control the discharge of sediment from the areas of waste placement. As stated above, these sedimentation ponds are regulated by the NPDES permit. However, many disturbed areas outside the limits of waste placement are not tributary to the regulated sedimentation ponds. It was the understanding of this writer that these unregulated areas eventually discharge to Mallard Lake. As was discussed during the inspection, a new SWP3 must be developed for the site indicating where these disturbed areas drain and the method for sediment control.

Transfer Station

A new rail transfer station was under construction on the northwest corner of the property at the time of the inspection. The transfer station will be used to transfer waste material from rail cars to trucks for transport to the landfill. The wastewater material will be both Construction and Demolition Debris (C&DD) and regulated solid waste. However, it is anticipated the only C&DD will be initially handled at the transfer station.

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The concerns associated with the transfer station and haul road were discussed during the inspection. Those concerns are as follows.

1. Any precipitation that contacts waste material will be considered leachate. This includes waste material on the ground and waste material in railroad cars or trucks.
2. Transfer stations at other locations have historically been associated with the unpermitted discharge of leachate because of the difficulty of keeping waste material contained and isolated from precipitation.

As discussed during the inspection, the transfer station area must be addressed in an SWP3 to identify drainage patterns and sediment controls from the site. It was indicated that an SWP3 separate from the rest of the landfill area will be generated for the transfer station. The SWP3 for the transfer area must also include actions that will be taken to prevent precipitation from contacting waste material. The SWP3 must describe how Central Waste will keep the area surrounding the station, railroad tracks and haul road free of waste material at all times and how Central waste will prevent the discharge of leachate generated from the trucks and rail cars.

Compliance Review

Permit Limits

The compliance record for the Central Waste Inc. landfill was reviewed for the period covering October 2006 through August 2007. No violations of the permit limits were identified for the review period.

Storm Water Pollution Prevention Plan

Part II of the NPDES permit requires that Central Waste keep the SWP3 current. The SWP3 presented during the inspection was dated January 1999. Many modifications to the site have occurred since the 1999 SWP3 was developed. Failing to maintain the SWP3 places Central Waste in violation of Part II, Item E.3 of the NPDES permit. Such violations of the permit constitute violations of Ohio Revised Code 6111.07 which are subject to enforcement action. As discussed during the inspection, the SWP3 for the landfill property will be completed no later than December 31, 2007. It is the understanding of this writer that the SWP3 for the rail transfer facility will also be completed by December 31, 2007. The SWP3 must include, but not be limited to the content requirements included in Part II, Item E.4 of the NPDES permit. Seeding and mulching procedures for inactive areas must also be included in the SWP3

Organic Pollutant Monitoring

Part II, Item F of the NPDES permit requires Central Waste to characterize the discharge of wastewater for organic pollutants. Central Waste must sample any discharge from Outfalls 002 and 003 in accordance with Part II, Item F of the NPDES permit. Submit with the results the chain-of-custody forms generated for each sample to show that the samples were collected and handled with approved methods. Each outfall must be sampled prior to the end of the year in the event a discharge occurs before December 31, 2007.

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Roll Off Box Storage Area

Central Waste stores roll off boxes on the east side of the office parking area. This area must be specifically identified in the revised SWP3. The runoff from the roll off box storage area must be regulated by the NPDES permit.

Conclusion

Based on the results of the inspection, the following is a summary of actions that must be taken by Central Waste.

1. Central Waste must update the SWP3 for the entire site including the rail transfer area. The SWP3s for the disposal area and the transfer station must address the concerns noted above and identify discharge locations for areas not tributary to the permitted sediment ponds. Based on the revised SWP3s, the NPDES permit will be modified to include all discharge locations.
2. Central Waste must submit a request to modify the NPDES permit to include the new discharge locations identified in the revised SWP3s. The Request for Modification Form can be found at:

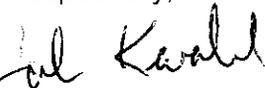
<http://www.epa.state.oh.us/dsw/permits/npdesform.html>

The completed form and the appropriate fee of \$200.00 must accompany the revised SWP3.

3. Central Waste must sample both permitted discharge locations for organic pollutants as required by Part II, Item F of the NPDES permit.

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

cc: Dan Tolmer, Civil and Environmental Consultants, Inc.
Misty Koletich, Sanitarian, Mahoning County Department of Health

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