

**Environmental
Protection Agency**

**Governor
Lt. Governor
Director**

August 26, 2011

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

Mr. Don Minihan
Central Waste, Inc.
12003 Oyster Road
Alliance, OH 44601

Mr. Minihan:

On August 2, 2011 this writer conducted an unannounced Compliance Evaluation Inspection (CEI) of the Central Waste, Inc. facility. The intent of the inspection was to evaluate the site for compliance with the NPDES Permit and the SWP3. Following are observations made during the inspection.

Site Observations

Sedimentation Basins for the Limits of Waste Placement

During the inspection, two sedimentation basins were in place to control the discharge of sediment from the areas inside the limits of waste placement. The basins are described as the south sedimentation basin (Outfall 003) and the north sedimentation basin (Outfall 004). No discharge through the south sediment basin was occurring at the time of the inspection. Approximately 5 – 10 gpm of water was discharging to Boot Lake from the north sediment basin at the time of the inspection. The trash racks on both outfall structures were intact at the time of the inspection. No concerns regarding excessive sediment deposition in either pond was noted.

Borrow Areas A and C

Silt Trap A was in place near the south sedimentation basin. The basin is intended to receive storm water runoff from areas west and south of the landfill. The discharge from the new silt trap is identified as Outfall 005 in the NPDES Permit. No discharge from Silt Trap A was occurring at the time of the inspection.

The eastern borrow area (Borrow Area "A") east of Boot Lake was inspected for runoff control. There was no activity in Borrow Area "A" during the inspection. Sumps proposed for the area had not been installed. Be advised that the sumps and other storm water control structures must be in place prior to any future disturbance of the area.

Transfer Station

The transfer station was inspected to check the status of the constructed wetland located on the northeast corner of the building. The constructed wetland is used to treat storm water runoff prior to discharge into the natural wetland adjacent to the transfer building. Some native

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wetland species from onsite were previously planted in the wetland. However, it appeared that the constructed wetland had been inundated with cattails at the time of the inspection.

The transfer station was idle at the time of the inspection.

Pump Area to the North Sediment Basin

During the inspection, storm water normally pumped to the North Sediment Basin was being pumped to an unpermitted drainage way that discharges directly to Boot Lake. Though the water was clear at the time of the inspection, the discharge constituted a potential violation of Ohio Revised Code 6111.04.

It was explained by Mr. Minihan that the pump used to transfer storm water to the North Basin was being repaired and that no spare pump was available. As agreed, a spare pump capable of pumping the water to the North Basin will be purchased as a backup pump for this area.

New Borrow Area

It was reported that a new borrow area has been initiated on the north side of the property since the last inspection. Though this area could not be accessed during the inspection due to road work being conducted, it was reported that any runoff from the area would flow directly into Mallard Lake during precipitation events. In the event this is accurate, the discharge of storm water from the site could potentially be a violation of Ohio Revised Code 6111.04. A follow-up inspection has been scheduled for this borrow area.

Be advised that this area is not identified in the SWP3 as a potentially disturbed area. The SWP3 must be updated per Part IV, Item C of the NPDES Permit.

New Eastern Runoff Area

Two roads located on the east side of the fill area converge at an area north of the South Basin and west of Boot Lake. Heavy gravel accumulations were evident at the point of convergence for the two roads. It appeared that storm water flows directly into Boot Lake with no treatment prior to discharge. Discharges of sediment through unpermitted outfalls to waters of the state are a violation of Ohio Revised Code 6111.04. This area needs to be evaluated for installation of sediment control structures to prevent future violations of Ohio Revised Code 6111.04.

Compliance Review

The compliance record for the Central Waste Inc. landfill was reviewed for the period covering August 2010 through July 2011. No limit violations were reported during the review period. However, the following reporting violations were identified.

Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2011	003	Nitrogen, Ammonia	1/2Weeks	1	0	06/01/2011
June 2011	003	Chemical Oxygen Demand	1/2Weeks	1	0	06/01/2011

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Reporting Period	Station	Parameter	Sample Frequency	Expected	Reported	Violation Date
June 2011	003	Specific Conductance	1/2Weeks	1	0	06/01/2011
November 2010	004	Nitrogen, Ammonia	1/2Weeks	1	0	11/15/2010
November 2010	004	Phosphorus, Total	2/Year	1	0	11/01/2010
November 2010	004	Chemical Oxygen Demand	1/2Weeks	1	0	11/15/2010
November 2010	004	Specific Conductance	1/2Weeks	1	0	11/15/2010
June 2011	004	Nitrogen, Ammonia	1/2Weeks	1	0	06/01/2011
June 2011	004	Chemical Oxygen Demand	1/2Weeks	1	0	06/01/2011
June 2011	004	Specific Conductance	1/2Weeks	1	0	06/01/2011

Be advised that failure to report in accordance with the frequency in the permit is considered a violation of Ohio Revised Code 6111.07

Storm Water Pollution Prevention Plan

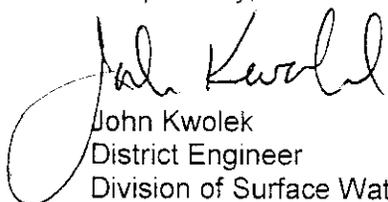
Part II of the NPDES Permit requires that Central Waste keep the SWP3 current. New areas have apparently been disturbed that have not been added to the SWP3. Be advised that failure to keep the SWP3 current is a violation of Part 2, Item 3 of the NPDES Permit and a violation of Ohio Revised Code 6111.07.

Organic Pollutant Monitoring

Part 2, Item H of the NPDES Permit requires Central Waste to annually monitor organic pollutants at each outfall. On October 19, 2010, Ohio EPA received the annual organic pollutants report for 2010. All parameters appeared to be below detection. To date, this office has not received the 2011 report. As a reminder, Central Waste must collect and analyze samples for organic pollutants from each outfall, and submit the results prior to the end of 2011.

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: Mary Helen Smith, Mahoning County Department of Health

ec: Allison Giancola, Ohio EPA, NEDO, DSIWM
Katharina Snyder, Ohio EPA, NEDO, DSIWM