



State of Ohio Environmental Protection Agency

Northeast District Office

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

March 26, 2008

RE: COLUMBIANA COUNTY
MADISON TOWNSHIP
REDBUD COMPANY, INC.
NPDES PERMIT NO. 3IN00247

NOTICE OF VIOLATION

Ms. Rosemary Lacher
Redbud Company, Inc.
P.O. Box 389
Lisbon, OH 44432

Dear Ms. Lacher:

On Thursday March 6, 2008, this writer, along with John Kwolek and Chris Moody, conducted an inspection of the Redbud fly ash disposal site in West Point. The intent of the inspection was to monitor the compliance status of the facility and evaluate the N-viro process for odor complaints. The weather on the day of the inspection was sunny and cool.

NPDES Discharge:

On the day of the inspection, the system appeared to be operating normally. Three new sediment traps have been constructed just south of pond 2. A review of the Monthly Operating report data the last three years (January 2005 through February 2008) revealed only a few violations from outfall 001. There have been four pH violations and one Dissolved Oxygen violation. Of a bigger concern is the Alpha and Beta sampling for station 601. Data Substitution Codes "A codes" for this station indicate the sample is not being collected. There are no results for these parameters in the SWIMs system. If any data is available for this station the MORs should be updated within the system to demonstrate the data is being collected. The sampling for these parameters is only quarterly; the lab should be able to meet a 90 day turn around for analysis. This lack of reporting is a violation of the facility's NPDES permit.

Storm water from the southeast portion of the site that was disturbed was reaching pond 1. This pond was only for run on diversion ditches. This pond was to prevent any water from off site from entering the site itself. Any disturbed areas within the landfill must be routed to pond 2.

There appeared to be some areas where new liner was installed. Any areas that have not had liner data submitted for permeability must be submitted to this office. The data must also include the target values from the proctor test for maximum dry density and optimum moisture content.

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N-viro Process:

The facility was inspected for recent odor complaints. At the time of the inspection no sludge was being processed. Only minor odors were noticeable from a small pile waiting to be processed from past clean up of the concrete area. At that time your facility is no longer accepting sludge from the Niagra plant which seems to cause a great deal of the odor. Another concern from the concrete area and the proposed truck wash off area is organic waste from the sludge discharging from run off to the storm water pond for this area. This pond is not designed to handle organic matter or bacteria that would be associated with the sludge. Run-off that may come in contact with the sludge or truck washing should be incorporated in a recycle system. Wastewater removed from the system could be used in the fly ash processing. The use of disinfection should be evaluated. Solids from the system could be reprocessed through the N-viro process. A permit-to-install must be submitted for the wastewater treatment facilities.

If you have any questions you can contact me at (330) 963-1193 or at the e-mail address joe.trocchio@epa.state.oh.us.

Sincerely,



Joseph E. Trocchio
Division of Surface Water
Northeast District Office

cc: Dean Hunt, P.E.

REDBUD INSPECTION PHOTOS



STORM WATER FROM CONCRETE PAD AND TRUCK WASH (BACKGROUND) MUST BE CAPTURED AND RECYCLED.



STORM WATER FROM THIS SOUTHEAST PART OF THE SITE MUST BE DIVERTED TO POND 2 FOR TREATMENT. THIS POND IS ONLY TO PREVENT RUN-ON STORM WATER.