

**Environmental
Protection Agency**

Timothy J. Walsh, Governor
Lee Fisher, Lt. Governor
John P. Bland, Director

November 5, 2010

RE: REMIATION AND LIABILITY MANAGEMENT CO
PERMIT NO. 31100200
LORAIN COUNTY
ELYRIA

Mr. Douglas Wagner
Remediation and Liability Management Company, Inc.
7704 Milan Road
Sandusky, Ohio 44870

Dear Mr. Wagner

On October 7, 2010, an inspection of the above referenced site was conducted. The facility was represented by you. The purpose of the inspection was to discuss the facility's compliance status with respect to the terms and conditions of the above referenced National Pollutant Discharge Elimination System (NPDES) permit.

During the inspection, the following items were noted/discussed:

1. The Remediation and Liability Management Co. Inc. (REALM) Elyria landfill site consists primarily of a closed solid waste landfill.
2. The landfill contains approximately 50,000 cubic yards of stabilized hazardous waste sludge generated from electroplating operations at the former General Motors – Inland Fisher Guide Division manufacturing plant.
3. The Landfill was capped in 1988.
4. REALM applied for an initial NPDES permit for the landfill's stormwater discharge on March 21, 2008.
5. REALM was issued an NPDES permit with an effective date of August 1, 2008.
6. Conestoga-Rovers & Associates collects the stormwater samples and reports monthly all required analytical results to Ohio EPA's electronic discharge monitor reporting (e-DMR) system.
7. Conestoga-Rovers & Associates has been granted designated authority to submit the analytical data via the e-DMR system. You indicated that the paperwork was submitted to Mr. Jamie Roberts, Ohio EPA's Surface Water Information Management System Administrator.
8. The analytical analysis is performed by Severn Trent Labs in Canton.
9. Currently the landfill has 5 let downs which direct the stormwater from the top of the landfill into a perimeter drain which ultimately discharges through permitted outfall 31100200001.

10. The last three let downs were installed in 2008. Additionally, the perimeter drain was replaced and the drainage layer on top of the cap was tied in.
11. The landfill has two leachate collection tanks. You indicated that REALM is going to discontinue using the leachate collection tanks.
12. Clean Harbours will pump the leachate directly from the four sumps.
13. The leachate is hauled to Clean Harbours Cleveland facility.
14. Outfall 31100200001 was observed. The discharge was clear.
15. You indicated that a cement weir was scheduled to be constructed at the outfall by the end of October.

This office has recently reviewed your self-monitoring reports covering the period August 1, 2008 through September 30, 2010 for the referenced facility. Our review indicates violations of the terms and conditions of your NPDES permit. The specific instances of non-compliance are as follows:

Code Violations

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00083	Color, Severity			AF	2/2/2009
001	00530	Total Suspended Solids			AF	2/2/2009
001	01350	Turbidity, Severity			AF	2/2/2009
001	50050	Flow Rate			AF	2/2/2009
001	00400	pH			AF	2/2/2009
001	00310	Biochemical Oxygen Dem			AF	2/2/2009
001	00335	Chemical Oxygen Demand			AF	2/2/2009
001	00095	Specific Conductance a			AF	2/2/2009
001	00945	Sulfate, (SO4)			AF	2/2/2009
001	00083	Color, Severity			AF	1/7/2010
001	00530	Total Suspended Solids			AF	1/7/2010
001	01350	Turbidity, Severity			AF	1/7/2010
001	50050	Flow Rate			AF	1/7/2010
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001	01350	Turbidity, Severity			AF	1/14/2010
001	50050	Flow Rate			AF	1/14/2010
001	00400	pH			AF	1/14/2010
001	00310	Biochemical Oxygen Dem			AF	1/14/2010

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001	00095	Specific Conductance a			AF	1/14/2010
001	00945	Sulfate, (SO4)			AF	1/14/2010
001	00083	Color, Severity			AF	2/5/2010
001	00530	Total Suspended Solids			AF	2/5/2010
001	01350	Turbidity, Severity			AF	2/5/2010
001	50050	Flow Rate			AF	2/5/2010
001	00400	pH			AF	2/5/2010
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001	00095	Specific Conductance a			AF	2/5/2010
001	00945	Sulfate, (SO4)			AF	2/5/2010
001	00083	Color, Severity			AF	2/11/2010
001	00530	Total Suspended Solids			AF	2/11/2010
001	01350	Turbidity, Severity			AF	2/11/2010
001	50050	Flow Rate			AF	2/11/2010
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Please be advised that such instances of non-compliance may be cause for enforcement actions pursuant to the Ohio Revised Code, Chapter 6111.

Should you have any comments or questions concerning this letter, please feel free to call me at (330) 963-1143.

Respectfully,



Michael W. Stevens
Environmental Engineer
Division of Surface Water

MWS/mt