



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

March 9, 2011

RE: 3DP00042*AP
LORAIN 1 LANDFILL
INDUSTRIAL USER INSPECTION
OBERLIN
LORAIN COUNTY

Mr. Chris Jaquet, PE
Allied/Republic Services, Inc.
22730 Fairview Center drive, Suite 100
Fairview Park, OH 44126

Dear Mr. Jaquet:

On February 22, 2011, representatives of this office conducted an Industrial User Inspection of the above facility. The Ohio EPA was represented by Donna Kniss, Ryan Laake, Tim Fulks, and John Schmidt. You represented the company currently owning the landfill, along with James Peebles, Brown and Caldwell. Jeff Bauman, Public Works Director, and Steve Hoffert, wastewater treatment plant (WWTP) Superintendent, represented the City of Oberlin. The Lorain 1 Landfill discharges leachate to the City of Oberlin WWTP and has been issued Indirect Discharge (IDP) permit 3DP00042*AP. The purpose of the inspection was to evaluate compliance with the existing IDP and collect information for the IDP renewal.

The Lorain 1 Landfill was closed under older solid waste rules; there is no bottom liner, and the cap consists of 2 feet of compacted dirt. Consequently, leachate generation rates vary based on the weather, and significant amounts can be generated. Leachate flows by gravity to two 50,000 gallon storage tanks, and then flows by gravity to the Oberlin WWTP, which is located on the adjacent parcel. Landfill gas condensate and air compressor condensate are also routed to the storage tanks. The storage tanks are sized to hold the leachate if the discharge to the Oberlin WWTP must be temporarily halted.

Samples are collected by Brown and Caldwell on behalf of Allied/Republic Services. The samples are taken to the WWTP where they are split. The WWTP uses Jones and Henry laboratory, and Brown and Caldwell uses Heritage Environmental. A review of the Heritage analytical reports showed that 40 CFR 136 methods are being used, and the chain-of-custody forms (COCs) are generally complete. Allied should confirm that composite sampler start and stop times are recorded in a field notebook or other defensible record, because they are not noted on the COC.

A review of the discharge monitoring data from January 2007 to January 2011 shows that there are two major issues that require closer examination. The first issue is the substitution of free cyanide analyses for total cyanide. Allied and Oberlin agreed to switch to free cyanide because that is the parameter limited by the City of Oberlin's NPDES permit. However, the City of Oberlin's Sewer Use Ordinance (SUO) contains a limit for total cyanide, which the Ohio EPA is obligated to include in the IDP. The Oberlin local limits have not been re-evaluated since the 1990s. We discussed reasons why a review would be necessary, and the fact that approved pretreatment programs are required to evaluate their local limits every five years. We indicated that the local limits should be reviewed because of their age.

Mr. Chris Jaquet, PE
Lorain 1 Landfill
March 9, 2011
Page 2

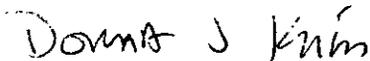
The second major issue is total dissolved solids (TDS). The current IDP contains a daily maximum limit of 3500 mg/l. The SUO contains a limit of 1500 mg/l, but Mr. Baumann, the Public Works Director, stated that the limit of 3500 mg/l was authorized by council in a separate action. Please submit a copy of this action by City Council for our files.

There were 50 reported values from January 2007 to January 2011; of those, 23 exceeded the permit limit of 3500 mg/l. The average concentration for that time period is approximately the permit limit, 3500 mg/l. An analysis of the actual TDS loadings to the Oberlin WWTP, and the calculated effect on the Oberlin WWTP effluent, shows that the average increase in TDS due to the Lorain 1 Landfill discharge is 48 mg/l, with the maximum increase calculated as 156 mg/l. The fact sheet for the Oberlin WWTP 2010 NPDES permit renewal did not contain any TDS information, and TDS has not been identified as a contaminant of concern for the WWTP.

We discussed the current limit and the fact that there have been numerous IDP limit violations that have not had any noticeable impact on the WWTP. Local limits must be protective of WWTP operations, and must be technically justified. We discussed possible alternative ways to limit the Lorain 1 Landfill TDS discharge that would be protective of WWTP operations, but that would not result in multiple IDP limit violations for conditions without any impacts. We agreed that we would continue discussions with the goal of determining the appropriate limit that will be placed in the renewed IDP.

If you have any questions or comments, please contact me at (330) 963-1285. I can also be reached via e-mail at donna.kniss@epa.state.oh.us.

Sincerely,



Donna J. Kniss
Environmental Engineer
Division of Surface Water

DJK/mt

pc: Jeff Baumann, Public Works Director, City of Oberlin
James Peeples, Brown and Caldwell
Ryan Laake, Ohio EPA, CO, DSW

ec: John Schmidt, Ohio EPA, NEDO, DSW
Tim Fulks, Ohio EPA, CO, DSW

File: Pretreatment Industrial User/Permit-Compliance

Donna Kniss - Pretreatment guidance

From: Donna Kniss
To: shoffert@cityofoberlin.com
Date: 3/8/2011 10:50 AM
Subject: Pretreatment guidance
CC: Ryan Laake

Steve:

I believe I still owe you this information. The link for the pretreatment program guidance page is:

<http://www.epa.state.oh.us/dsw/pretreatment/guidance.aspx>

There are links to the USEPA model ordinance and local limits guidance documents on this page. Please contact Ryan or me if you have any questions. Also, please send an e-mail confirming you received this. Sometimes our e-mails seem to vanish, and I want to be sure that you received this information.

Donna

Donna J. Kniss
Ohio Environmental Protection Agency
Division of Surface Water
Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087
330-963-1285
fax 330-487-0769

donna.kniss@epa.state.oh.us