



**Environmental  
Protection Agency**

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

November 19, 2010

RE: Lorain County  
Black River Watershed  
New Russia Twp.  
Lorain County Landfill New Main Entrance

Mr. Chris Jaquet  
Republic Services Inc.  
22730 Fairview Center Dr, Suite 100  
Fairview Park, OH 44126

Dear Mr. Jaquet:

On October 13, 2010, I performed a compliance inspection of storm water best management practices (BMPs) at the above referenced site. I was accompanied on my inspection by Rich Kostelnick, site manager. Our records indicate that storm water discharges associated with this construction project are authorized under the Ohio EPA General Storm Water National Pollutant Discharge Elimination System (NPDES) Permit for Construction Activities #3GC04617\*AG.

Our inspection revealed that construction activities at this site have largely been completed. As such, our inspection focused on the implementation of post-construction BMPs. A review of the Storm Water Pollution Prevention Plan (SWP3) revealed that it provides insufficient information to determine compliance with the NPDES permit. In particular, a dry extended detention basin appears to be the intended post-construction BMP, but the plan does not provide a detail drawing of the permanent outlet structure for the pond, does not provide the calculations to show the orifice size needed to drain the Water Quality Volume (WQv) in 48 hours or longer, and does not indicate the elevation at which storage of the WQv is achieved. In addition, a forebay and micropool have not been provided in the permanent basin design as required by the NPDES permit. Each of these features must be sized at 10% of the WQv.

The basin is currently designed and built to be a sediment basin. Although it is quite common for the same storm water pond to provide sediment control during construction and post-construction water quality control after construction is completed, please be aware that the outlet structure and storage volumes required for sediment control are different than those required for post-construction water quality control. The SWP3 shows a skimmer device for sediment control during construction, but this is not intended to be a permanent outlet structure. Skimmers are temporary structures in place only during the time that the site is under construction. In addition, the design requirements of sediment basins (storage volumes and drain time) are different than those of a permanent, dry extended detention basin. Thus, modification of the basin and its outlet structure is likely necessary to comply with the NPDES permit as the project moves into post-construction mode.

Please review the permanent design of the basin and modify the SWP3 as necessary so that it complies with the NPDES permit. Once disturbed areas have been permanently stabilized, i.e., disturbed areas are re-vegetated to a 70% or greater growth density, the basin will need to be converted for its post-construction function.

In addition, we noted the following deficiencies in the SWP3:

**Northeast District Office**  
2110 East Aurora Road  
Twinsburg, OH 44087-1924

330 | 963 1200  
330 | 487 0769 (fax)  
[www.epa.ohio.gov](http://www.epa.ohio.gov)

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- No post-construction BMP has been provided for the Western Roll-Off Storage Area. This area drains to the west via swales to Plum Creek. We suggest the installation of a bioretention cell around catch basins or conversion of the grassed swales to enhanced water quality swales. Please amend the SWP3 to provide a post-construction BMP for the Western Roll-Off Storage Area and provide me with a schedule for its installation. The BMP must be installed before the NPDES permit can be terminated.
- Leachate from the scales, i.e., runoff from the scale area, is being collected in a surface pond with potential to discharge to Plum Creek either directly via the emergency spillway or via the storm water detention basin via the storm sewer system. The pond was covered with algae on the date of inspection (see photos). The NPDES permit for storm water runoff does not authorize the discharge of leachate from the scale area. Please indicate the measures that will be taken to prevent the discharge of leachate from the scales. Leachate should be directed to sanitary sewers or other wastewater treatment system. Please consult with Mike Stevens of this office for further information regarding this deficiency. Mike can be contacted at (330) 963-1143 or [mike.stevens@epa.ohio.gov](mailto:mike.stevens@epa.ohio.gov).
- Erosion rills and disturbed soils in the basin must be repaired and permanently stabilized. As we are past the growing season for 2010, this will likely have to wait until spring 2011 if this matter has not yet been addressed.

Please provide me with a letter of response indicating the actions you will take to address the deficiencies noted above. Include a copy of any amendments made to the SWP3. Further, please contact Nancy Funni at the Lorain Soil & Water Conservation District (SWCD) to determine if amendments require local review and approval. Nancy can be reached at (440) 326-5800. Your response should be received no later than December 10, 2010.

If you have any questions, please contact me at (330) 963-1145.

Sincerely,



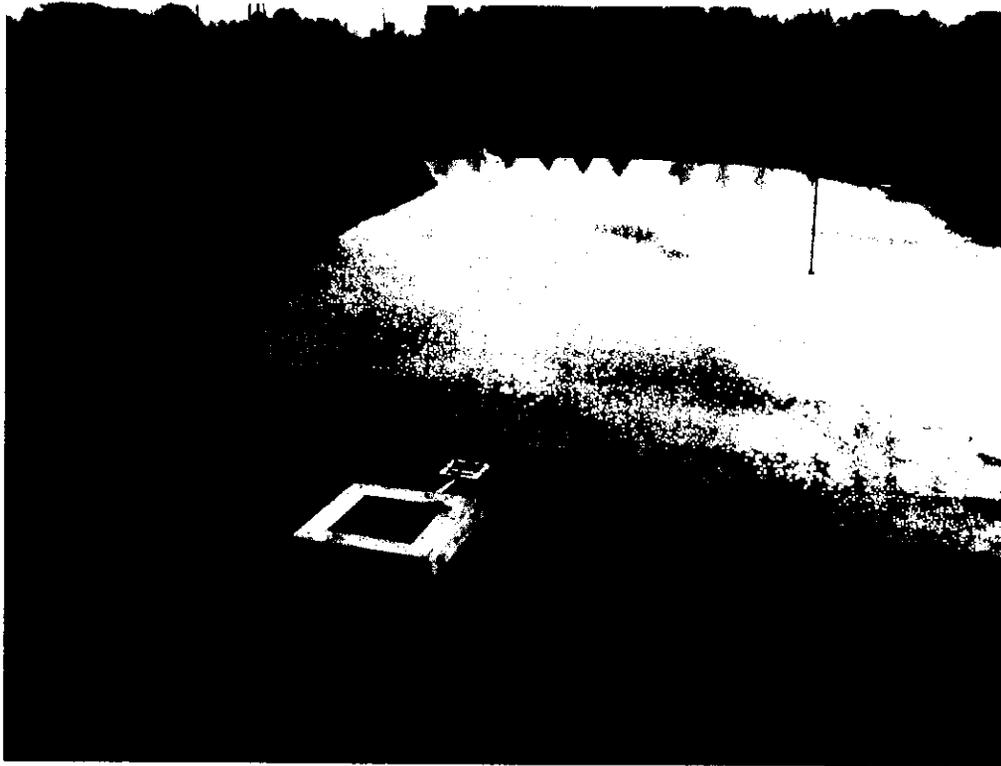
Dan Bogoevski  
District Engineer  
Division of Surface Water

DB/mt

cc: Nancy Funni, Lorain SWCD  
Wayne Milette, Lorain County Engineers Office  
Trustees, New Russia Twp.  
Rich Kostelnick, Lorain County Landfill LLC  
Mike Stevens, Ohio EPA, DSW, NEDO

**LORAIN COUNTY LANDFILL NEW MAIN ENTRANCE**  
New Russia Twp. Lorain County  
Operator: Republic Services Inc.

**Photos Taken:** October 13, 2010  
**By:** Dan Bogoevski, DSW, NEDO



**Fig 1.** The storm water management pond is still configured to be a sediment basin. Some rill erosion is evident on the influent end of the pond.



**Fig 2 & 3.** The holding pond near the truck scales is covered with algae and appears to be leachate impacted. If not managed appropriately, leachate may either enter a catch basin (visible in left photo) or flow over the emergency spillway (visible in right photo).



**Fig 4.** Erosion rill is evident where storm water runoff enters the sediment basin. This must be repaired. Vegetation in the basin must reach a 70% or greater growth density to qualify for final stabilization.



**Fig 5 (LEFT).** No post-construction BMP is installed to control runoff from the Western Roll-Off Storage Area. Runoff flows to the catch basin visible in the foreground of the photo.



**Fig 6 (RIGHT).** Example of a bioretention cell built within a drainage swale around a catch basin. Cell is located on Sterncrest Road in the Village of Orange, Cuyahoga County.