



**Environmental
Protection Agency**

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

October 4, 2012

**RE: CITY OF RAVENNA
CLASS IV COMPOST FACILITY
NOTICE OF VIOLATION**

CERTIFIED MAIL 7012 1010 0002 2260 0673

Kelly Engelhart
Director of Public Service
City of Ravenna
P.O. Box 1215
Ravenna, OH 44266

Dear Ms. Engelhart:

On September 27, 2012, I (Jarnal Singh), of the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM) conducted a partial inspection of the City of Ravenna Class IV compost facility located on East Lake Street, Ravenna. The purpose for the inspection was to determine compliance with the requirements pertaining to compost facilities, as set forth in Chapter 3745-560 of the Ohio Administrative Code (OAC). Weather conditions at the time of this inspection were overcast, slight drizzle and approximately 55°F. I met with, and was accompanied by you, Robert Finney, Chuck Dowdy and Jim Ready during this inspection.

Violations of the following requirements were noted during this inspection:

- 1) ***OAC 3745-560-410(N)(2) Eliminate ponding of leachate and the conditions that contribute to the discharge of leachate from the composting facility.***

OAC 3745-560-410(N)(3) Collect and contain leachate within the boundary of the composting facility and prevent leachate from discharging to waters of the state. Leachate may be collected and contained for reintroduction into the composting process.

Leachate was observed ponding on the east portion of the property around the pile of bagged yard waste. Windrows and piles of yard waste were also placed at locations which would allow leachate to migrate off site. This is a violation of the above referenced requirements. Windrows should either be relocated or a berm should be constructed around the property so that leachate can be contained and properly collected on the facility.

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2) OAC 3745-560-415(A) Record retention and availability. The owner or operator shall do the following:

(1) Maintain records specified in this rule for a period of at least three years.

(2) Have records available for inspection by the approved board of health or Ohio EPA during normal operating hours.

(B) Log of operation. The owner or operator shall do the following:

(1) Record the facility operations on the log of operation forms as specified in rule 3745-560-04 of the Administrative Code.

(2) Complete the log of operation at a minimum once per week at an active composting facility and once per month at an inactive composting facility.

A log of operations as specified in rule 3745-560-04 was not being utilized by the owner/operator of the facility. The owner/operator is therefore in violation of the above requirements. A log of operations can be downloaded from http://epa.ohio.gov/portals/34/document/guidance/gd_010.pdf and should be used to monitor and record operations at the facility.

The City of Ravenna must immediately take all necessary measures to return to compliance with the above identified requirements and Ohio's environmental laws. Within 14 days of receipt of this letter, please provide documentation to this office that sets forth the steps and timeline to be followed to abate the violations cited above. Documentation of the steps taken and timeline to return to compliance may include written correspondence, updated policies, and photographs, as appropriate. Please submit your response via the postal service, or electronically to Jarnal.singh@epa.state.oh.us.

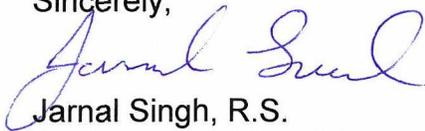
Also, please be reminded that per OAC 3745-560-03, an updated plan view drawing is required to be submitted to Ohio EPA by no later than February 1, 2013. A copy of the applicable composting rules and guidance documents may be downloaded from <http://epa.ohio.gov/dmwm/Home/Composting.aspx>.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the Entity from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts for remedying conditions resulting from any release of contaminants to the environment.

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If you have any questions, please do not hesitate to contact me at (330) 963-1276, or email me at "Jarnal.Singh@epa.state.oh.us."

Sincerely,

A handwritten signature in blue ink that reads "Jarnal Singh". The signature is written in a cursive style with a large initial "J".

Jarnal Singh, R.S.
Environmental Specialist
Division of Materials and Waste Management

JS:cl

File: [COMP/City of Ravenna/GEN/67]