



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

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

July 16, 2009

Re: Pretreatment
IU Inspection
Lawrence Co. Transfer/Recycling Station
City of Ironton

Mr. David Murphy, Site Engineer
Lawrence County Transfer/Recycling Station
Rumpke Waste Collection and Disposal Systems
10795 Hughes Road
Cincinnati, Ohio 45251

Dear Mr. Murphy:

On June 9, 2009, I inspected the Lawrence County Transfer/Recycling Station. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You and Chris Kelley, Facility Manager, represented Lawrence County Transfer/Recycling Station during the inspection.

General Facility Description

Lawrence County Transfer/Recycling Station receives recyclable materials and municipal solid wastes. Recyclable materials, including steel, aluminum, cardboard, plastics and papers are sorted and packaged. Solid wastes are received from private vehicles and commercial collection trucks and loaded onto haul trucks for transfer to Beech Hollow Sanitary Landfill. The facility receives an average of between 300 and 400 tons of waste per day. Waste and recyclables are processed inside a building to minimize exposure to precipitation. Leachate is collected in trenches in the receiving and transfer areas then pumped to a 1500 gallon above ground storage tank. The facility also has a wash bay for cleaning truck exteriors prior to maintenance. Wastewater from truck washing flows to an oil/water separator prior to storage in an 8,000 gallon underground storage tank. The separator is serviced by Clean Water Services of Dayton. The leachate tank is equipped with a sumped loading pad to contain any leachate spills during loading of haul trucks.

Leachate and truck wash water are hauled to the City of Ironton POTW. Flow is estimated by weighing the haul trucks. Truck wash water averaged roughly 8,000 gal per month, while leachate flow averaged roughly 2,000 gal per month during the past year. Sanitary wastewaters are disposed using an on-site septic system. Storm water is collected and pumped to a sedimentation pond for evaporation or discharge to a tributary of the Ohio River.

Lawrence County Transfer/Recycling Station is regulated as a significant industrial user and holds an Ohio EPA indirect discharge permit.

Required Actions

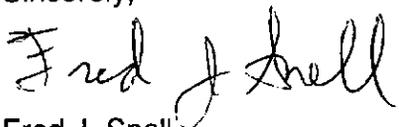
1. Lawrence County Transfer/Recycling Station is required to submit effluent monitoring reports to Ohio EPA once every six months. A minimum of three samples are required for each outfall with each report if there are three or more discharges to the City. The July through December 2008 report showed the AE code in lieu of results for Outfall 002. The AE code signifies invalid analytical results. Only one analytical result was provided for Outfall 001. Please provide an explanation for the use of the AE code and the reason(s) fewer than 3 sample results were reported for each outfall.
2. The solid waste haul truck loading bay has storm drains on each end. The drains lead to a pumping station followed by a settling pond which discharges to a tributary to the Ohio River. The facility obtained coverage under the Industrial Stormwater General Permit, NOI OGR00339*DG. The permit does not authorize discharge of storm water which has been in contact with solid waste. It was evident that the storm water was carrying solid wastes from the trenches to the sump, and thus had been exposed to wastes. Please provide Ohio EPA with plans for engineering controls or management practices at the facility which would prevent entry of storm waters exposed to solid wastes from entering the sedimentation pond.

Comments

Ohio EPA developed a web based electronic reporting system for preparing effluent monitoring known as e-DMR. Lawrence County Transfer/Recycling Station is strongly encouraged to use the e-DMR system for future effluent monitoring reports. Information about e-DMR is available at <http://www.epa.state.oh.us/dsw/swims/eDMR/eDMR.html>.

Please respond to this letter in writing within 30 days. Please contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell
District Representative
Division of Surface Water

FJS/dh

Enclosure

c: John Haskins, Superintendent, Ironton WWTP
c: Pretreatment Unit, DSW, CO

Pretreatment Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00053*AP	OHP000225	June 9, 2009	I	S	2

B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Lawrence County Transfer/Recycling Station 190 Private Drive 1533 Ironton, Ohio 45638	10:00 a.m.	November 1, 2006
	Exit Time	Permit Expiration Date
	11:30 a.m.	October 31, 2011

Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
David Murphy, Site Engineer Chris Kelley, Facility Manager	(513) 851-0122, Ext. 3161 (740) 534-9738, Ext. 6759
Name, Address and Title of Responsible Official	Phone Number
Jay Roberts, Rumpke EEAD Director	(513) 851-0122

C. AREAS EVALUATED DURING INSPECTION

<u> </u> S Permit	<u> </u> S Flow Measurement	<u> </u> S Pretreatment
<u> </u> S Records/Reports	<u> </u> S Laboratory	<u> </u> NA Compliance Schedules
<u> </u> S Operations & Maintenance	<u> </u> S Effluent/Receiving Waters	<u> </u> S Self-Monitoring Program
<u> </u> M Facility Site Review	<u> </u> NA Sludge Storage/Disposal	<u> </u> Other
<u> </u> S Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.


 Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

7/16/09
 Date


 Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

7/16/09
 Date