



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

April 23, 2011

Re: Athens County  
OU Compost Facility  
Industrial Stormwater  
Notice of Violation  
Permit #0GR00369\*DG

Mr. Steve Mack  
1 Riverside Drive  
Athens, Ohio 45701

Dear Mr. Mack:

On June 2, 2011, I performed an inspection of the OU Compost facility in Athens County along with Mike Cooper (Athens City – County Health Dept.) and Joe Holland (Ohio EPA). The inspection was conducted under the provisions of Ohio's water pollution control statutes, Ohio Revised Code (ORC) Chapter 6111. As a result of the inspection, I have the following comments:

1. **Ohio Revised Code (ORC) Chapter 6111.04 (1) states, "No person shall cause pollution or place or cause to be placed any sewage, sludge, sludge materials, industrial waste, or other wastes in a location where they cause pollution of any waters of the state."**

Current grade in the compost storage/windrow area is allowing leachate to migrate to waters of the state via overland flow. The area must be regraded to ensure that leachate does not mix with storm water and migrate into waters of the state during rain events. Future planning should take this stream into account.

OAC rule 3745-27-45(M)(4) requires that the materials placement areas and leachate management system shall be located at least two hundred feet from any surface waters of the state. The facility is not currently in compliance with this rule. Joe Holland, is currently working with Cliff Hamilton to address the 200' issue for the current facility and any proposed expansion of the site.

**Please submit a timeline and discuss how you plan to abate this issue.**

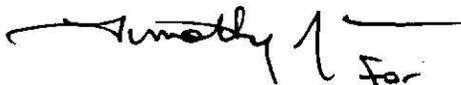
**You should collect samples of raw leachate and groundwater near the compost storage/windrow area and analyze them for the following pollutants: cBOD5, Ammonia Nitrate, Nitrite, pH, Total Dissolved Solids and Phosphorous. Please submit the sample results to me when they are available.**

As a reminder, Ohio EPA recommends that all compost operations be maintained and conducted on an impervious pad that drains to a wastewater treatment plant. Although Ohio EPA cannot require this practice to be implemented it is in the best interest of the college to do so. Environmental liabilities could arise if groundwater is found to be contaminated from compost operations at some point in the future.

Within fourteen (14) days of receipt of this letter, please submit to me, at this office, a written response to this letter. Your response should include the dates, either actual or proposed, concerning measures taken to address the items noted above.

If you have any questions, please contact me at (740) 380-5277.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Wolfe", with a horizontal line extending to the right and the word "for" written below it.

Aaron Wolfe  
Storm Water Coordinator  
Division of Surface Water

AW/dh

Enclosure

c: Joe Holland, DMWM, SEDO  
c: Cliff Waits  
c: Mike Cooper