



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

November 19, 2009

**Re: Jefferson County  
Crossridge, Inc. Landfill  
Self-Monitoring Report Violations  
OEPA Permit No. 0IN00106\*CD  
NPDES Permit No. OH0076775  
Correspondence (IWWW)**

Mr. Joseph G. Scugosa  
C&D Disposal Technologies, LLC  
3250 County Road 26  
Wintersville, Ohio 43953

Dear Mr. Scugosa:

On June 8, 2009, I conducted a Compliance Evaluation Inspection at the Crossridge, Inc. Landfill. The purpose of the inspection was to determine the compliance status with the terms and conditions of National Pollutant Discharge Elimination System (NPDES) permit number 0IN00106\*CD. The facility was not discharging during the inspection. I have provided additional comments with regards to Division of Surface Water regulatory issues at C&D Disposal Landfill.

We have received self-monitoring reports covering the months of January 2009 through April 2009 for the Crossridge facility. Our review indicated the following limit violations with respect to your NPDES permit.

**Numerical Violations:**

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	30	410.	1/1/2009
001	00530	Total Suspended Solids	1D Conc	45	410.	1/9/2009
001	00545	Residue, Settleable	1D Conc	0.5	1.3	1/9/2009
001	00530	Total Suspended Solids	30D Conc	30	88.	2/1/2009
001	00530	Total Suspended Solids	1D Conc	45	88.	2/26/2009
001	00545	Residue, Settleable	1D Conc	0.5	3.	2/26/2009

**Monitoring Frequency Violations:**

Violation Date	Station	Reporting Code	Parameter	Sample Frequency	Expected	Reported
3/1/2009	001	01330	Odor, Severity	1/Week	1	0
3/1/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/1/2009	001	00056	Flow Rate	1/Week	1	0
3/8/2009	001	01330	Odor, Severity	1/Week	1	0
3/8/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/8/2009	001	00056	Flow Rate	1/Week	1	0
3/15/2009	001	01330	Odor, Severity	1/Week	1	0
3/15/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/15/2009	001	00056	Flow Rate	1/Week	1	0
3/22/2009	001	01330	Odor, Severity	1/Week	1	0
3/22/2009	001	01350	Turbidity, Severity	1/Week	1	0
3/22/2009	001	00056	Flow Rate	1/Week	1	0

Please be advised that failure to comply with the effluent limitations or to satisfy the monitoring or reporting requirements of your NPDES permit is cause for enforcement action pursuant to the Ohio Revised Code Chapter 6111. Permit 01N00106\*CD requires the Owner to report noncompliance as directed by Part III.12.E of the permit which shall contain information listed in Part III.12.B and Part III.12.C. The monitoring frequency violations were followed up on in writing in a letter dated April 22, 2009. **We are still awaiting non-compliance notification for the numeric violations shown on page 1.**

Acute Toxicity is to be performed once per year at each outfall along with an upstream monitoring location per the NPDES permit. **Confirm that these tests are being conducted at upstream monitoring location 801.**

The following list of codes is enclosed for use in reporting laboratory results. Please use accordingly.

- AA - Below Detectable Limit
- AB - Analytical Data Lost
- AC - Facility Not Discharging (or No Sludge Hauled)
- AD - Automatic Analyzer Out of Service
- AE - Analytical Data Not Valid
- AF - Sample Site Inaccessible Due to Flooding or Freezing
- AH - Sample Not Taken, Explanation Included
- AJ - Above Range of Automatic Analyzer
- AK - Biological Sample Too Numerous to Count
- AL - No Discharge For the Month
- AN - Sample Not Taken, Plant Not Normally Staffed (Saturdays, Sundays, and Holidays)

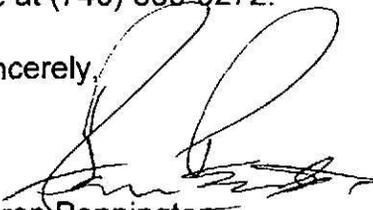
More information about eDMR is at: <http://www.epa.state.oh.us/dsw/edmr/eDMR.html>  
Outfall 002 at Crossridge was never built. Therefore, the 002 table in NPDES 01N00106\*CD can be eliminated with reference to that point source. You may submit a permit modification application to request that the outfall be removed from the permit, or continue to submit monthly reports with the code AL used for Station 002.

The CD&D landfill is currently in operation with one of the four landfill design ponds constructed. **Since the landfill is in operation, the pond at the CD&D landfill needs coverage under an individual NPDES.** The pond is currently covered in an NPDES permit for storm water associated with construction. The outfall monitoring associated with construction sedimentation ponds in the General NPDES is not adequate to provide assurance that leachate and/or onsite contaminants are not contributing pollutants to the outfall.

The Solid Waste plan set showed four ponds associated with the C & D Disposal landfill. The C&D Disposal outfall(s) can either be merged into the Crossridge Inc 01N00106\*CD permit if the Owner is the same or can submit for coverage of their own NPDES permit. Crossridge is surrounded by activities underway with the C&D Disposal Landfill and you are reportedly the signing agent for both entities. **Please correspond with your course of action in getting the ponds associated with the C&D Disposal landfill permitted under an individual NPDES. Additionally, include the timeframe of service for each of the landfill design ponds.** Note that the unpermitted discharge of storm water associated with industrial activity subjects you to significant monetary penalties.

**Please respond in writing within thirty days to the above highlighted comments.**  
A copy of the inspection report is enclosed. If there are any questions, please contact me at (740) 380-5272.

Sincerely,



Aaron Pennington  
Environmental Specialist  
Division of Surface Water

AP/dh

Enclosure

c: Aaron Wolfe, DSW, SEDO  
c: Dale Warner, DSIWM, SEDO  
c: Timothy Stevens, ODNR

**E. PERMIT VERIFICATION**

Inspection Observations Verify the Permit	Yes	No	N/A	N/E
a. Correct name and mailing address of permittee	X			
b. Correct name and location of receiving waters	X			
c. Product and production rates conform with permit application			X	
d. Flows and loadings conform with NPDES permit	X			
e. Treatment processes are as described in permit application/briefing memo	X			
f. New treatment process(es) added since last inspection		X <sup>1</sup>		
g. Notification given to state of new, different, or increased discharges			X	
h. All discharges are permitted		X <sup>2</sup>		
i. Number and location of discharge points are as described in permit		X <sup>3</sup>		

<sup>1</sup>C&D Disposal surrounds the Crossridge Landfill. Management is the same. The CD&D landfill is currently in operation with one of the four landfill design ponds constructed.

<sup>2</sup>Since the landfill is in operation, the pond at the CD&D landfill needs coverage under an individual NPDES. The pond is currently covered in an NPDES permit for stormwater associated with construction. The outfall monitoring associated with construction sedimentation ponds in the General NPDES is not adequate to provide assurance that leachate and/or onsite contaminants are not contributing pollutants to the outfall.

<sup>3</sup>Outfall 002 at Crossridge was never built nor will ever be built.

**F. COMPLIANCE SCHEDULES/VIOLATIONS**

	Yes	No	N/A	N/E
a. Any significant violations since the last inspection (total suspended solids, etc.)	X			
b. Permittee is taking actions to resolve violations		X		
c. Permittee has compliance schedule		X		
d. Compliance schedule contained in:			X	
e. Permittee is meeting compliance schedule			X	

**G. OPERATION AND MAINTENANCE**

Treatment Facility Properly Operated and Maintained	Yes	No	N/A	N/E
a. Standby power available:		X		
b. Adequate alarm system available for power or equipment failures			X	
c. All treatment units in service other than backup units	X			
d. Sufficient operating staff provided: Days/Week: <u>M-F 7-4 Sat 7-12 @ CD&amp;D</u>			X	
e. Operator holds unexpired license of class required by permit Class: <u>N/A</u>			X	
f. Routine and preventive maintenance schedule/performed on time		X <sup>1</sup>		
g. Any major equipment breakdown since last inspection		X		
h. Operation and maintenance manual provided and maintained				X
i. Any plant bypasses since last inspection		X		
j. Regulatory agency notified of bypasses: _____ on MORS _____ 800 Number			X	
k. Any hydraulic and/or organic overloads experienced since last inspection		X		

<sup>1</sup>Sediment controls are inadequate with respect to the C&D Disposal activities.



