



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

Re: Inspection Results
Lafarge Corporation Landfill
Paulding County
Notice of Violation

March 20, 2013

Mr. Tim Weible
Senior Environmental Manager
Lafarge Corporation
P.O. Box 160
Paulding, Ohio 45879

Dear Mr. Weible:

On March 4, 2013, Jeremy Scoles and I, representing the Ohio Environmental Protection Agency (Ohio EPA), performed an inspection of the Lafarge Corporation Landfill (Facility) at 11435 County Road 176, Paulding, Ohio. The purpose of this inspection was to verify compliance with Ohio Administrative Code (OAC) Chapter 3745-30 and the approved Permit to Install No. 03-9614 (PTI). The Facility is currently classified as a Class III residual waste landfill. You represented the Facility during all parts of the inspection.

Description of Ohio EPA's observations of the Facility:

The weather at the time of the inspection was cool and clear.

The required daily logs from December 13, 2012 through March 1, 2013 were reviewed. Relevant comments have been made in the daily log of operations, Form 3, regarding daily processes and disposal activity.

The access road leading to the leachate collection system stand pipe has been graded to divert surface water away from the cement kiln dust (CKD) disposal cell and additional maintenance has been performed to ensure access to the leachate collection system stand pipe for pumping efforts.

The owner/operator's contracted 3rd party was on site pumping leachate from the leachate collection system at the time of this inspection and was transporting the leachate to a 100,000-gallon slurry tank to be recycled back into the cement making process at the Facility.

Mr. Tim Weible
March 20, 2013
Page 2

As indicated by the Facility's records, no leachate was removed from the leachate collection system from December 10, 2012 through February 25, 2013. Approximately 84,000-gallons of leachate have been pumped from the leachate collection system between February 26, 2013 and March 1, 2013. According to the Facility's "Liquid Collection System Inspection Checklist" the March 1, 2013 leachate measurement was approximately 133-inches (11.08-feet) which indicates approximately 109-inches (9.08-feet) of head on the soil liner at the time of the measurement.

The owner/operator submitted an electronic copy of the "Liquid Collection System Inspection Checklist" on March 18, 2013. No leachate was pumped from the leachate collection system on March 11, 2013 and March 12, 2013. The March 15, 2013 leachate measurement was approximately 109-inches (9.08-feet).

Notification of violations of Ohio laws and rules:

The owner/operator of the Facility remains in violation of OAC Rule 3745-30-14(K)(4) for failing to acquire proper authorization to store leachate within the limits of waste placement in that greater than 1-foot of head is present on the soil liner. The owner/operator needs to continue removing the leachate from the leachate collection system.

The owner/operator of the Facility remains in violation of OAC Rule 3745-30-14(B)(2) for failing to conduct all operations in accordance with the Facility's PTI by failing to pump the leachate out of the sump in accordance with the plan. Details in the PTI explain that if leachate in the sump is greater than 2-feet then the sump will be pumped until the leachate level is less than 6-inches.

Recommendations and other comments:

The owner/operator should submit an electronic copy of the completed "Liquid Collection System Inspection Checklist" each Friday, by the close of business, to document the continued pumping efforts. On days in which the Facility is operating and no pumping occurs, the justification for not pumping should be documented on the "Liquid Collection System Inspection Checklist".

Ohio EPA witnessed the owner/operator of the Facility collecting a measurement of the leachate level in the leachate collection system sump during this inspection. A flashlight and extendable ruler were utilized to collect the measurement. The owner/operator of the Facility needs to ensure this is the most accurate and appropriate method to use and that this method will be capable of collecting the necessary measurement as the Facility progresses and as the leachate level fluctuates.

Mr. Tim Weible
March 20, 2013
Page 3

The owner/operator of the Lafarge Corporation Landfill needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within 14 days of receipt of this letter, the owner/operator is requested to provide documentation to this office including the steps taken to abate the violations cited above.

Documentation of steps taken to return to compliance includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to curtis.delong@epa.state.oh.us

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734 of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, the owner/operator is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

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 owner or operator, or others, from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act; Resources Conservation and Recovery Act; or Comprehensive Environmental Response, Compensation, and Liability Act for remedying conditions resulting from any release of contaminants to the environment.

Please contact me at (419) 373-3033 or curtis.delong@epa.state.oh.us if you have any questions concerning this inspection.

Sincerely,



Curtis DeLong, S.I.T.
Environmental Specialist II
Division of Materials and Waste Management

/cg

pc: Anthony Whitt, Lafarge Plant Manager
Brian Gasiorowski, Lafarge Regional Environmental Manager
DMWM/SW, Paulding County, Lafarge Corporation, Inspections

ec: Jeremy Scoles, DMWM, NWDO
Abdul Smiley, DMWM, NWDO