



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

July 25, 2013

**RE: NOBLE COUNTY
FAC- CROCK C&DD**

Mr. Ed Crock
Crock C&DD Landfill
17990 State Route 78
Caldwell, Ohio 43724

Dear Mr. Crock:

On July 18, 2013, I conducted an inspection of the Crock C&DD Landfill. I was accompanied by Rich Fox and Mark Mansfield, both of the Ohio EPA Southeast District Office.

During this inspection, we discussed your intentions to place all remaining material that is currently in your recycling area into the landfill facility. You stated that the current information you have from your engineer indicates you may have enough room in your Active Licensed Disposal Area for the unprocessed C&DD in your recycling area. You stated that the only remaining recycling you will conduct is the segregated dimensional lumber that is staged northwest of the licensed facility that is adjacent to your mulch product. You indicated that you will be moving your tub grinder to that location to convert the dimensional lumber to the mulch pile, and that will be the last of your recycling operation. The fines from your screener that were previously stockpiled there have been incorporated back into the unprocessed C&DD in your primary recycling area.

The following violations continue unabated at Crock C&DD Landfill:

Operating License-Special Terms & Conditions

Special terms and conditions were included in the 2007 License issued to the Crock C&D Landfill by the Noble County Health Department. The Crock facility is in violation of the following special terms and conditions of the 2007 license:

Within 60 days of issuance of this license, licensee shall submit a written report to the Noble County Health Department and Ohio EPA detailing actions taken to achieve compliance with conditions 1, 2, 3, and 4 above.

All required activities in Condition #5 were to be completed no later than February 28, 2007. A report was to be submitted to the Noble County Health Department and Ohio EPA. To date, Ohio EPA has not received this report.

October 29, 1999 Director's Orders-

Section V. 3. b. - Respondent shall perform the work described in Attachment A in conformance with the specifications and schedules contained therein.

Violations of Attachment A include the following:

Section II. E. - Within 180 days of the effective date of these Orders, Respondent shall execute and fund a post closure care financial assurance instrument meeting the requirements of OAC Rules 3745-27-16 and 3745-27-17. The post closure care financial assurance instrument shall contain an itemized written estimate, in current dollars, of the cost of post closure care of the Flood Debris Disposal Unit for a period of no less than 30 years. The estimate shall be based on a third party conducting the post closure care activities. The post closure care financial assurance instrument shall, at a minimum, be reviewed and adjusted annually in accordance with OAC Rule 3745-27-16(D).

To date, Ohio EPA has not received any documentation that a proper post-closure care financial assurance instrument has been executed.

Additional violations of OAC Rules include:

OAC Rule 3745-400-11 (B) (2) - The owner or operator shall dispose of construction and demolition debris only within the active licensed disposal area.

A significant amount of waste has been amassed outside the previously licensed limits of your facility. A large amount of waste has been placed just outside the entry to the facility. You have been segregating out dimensional lumber for recycling into mulch. However, much of the waste material has not been recycled. Ohio EPA has determined this to be illegal disposal.

The following violations were observed in the recycling area during this inspection:

OAC 3745-400-04 (B) - No person shall conduct or allow illegal disposal of construction and demolition debris, as defined in rule 3745-400-01 of the Administrative Code.

Ohio EPA has determined that the deposition of the C&DD outside your licensed facility and the material you have removed from your landfill and placed outside the boundary of your licensed facility constitutes illegal disposal of C&DD.

All of waste material outside your facility must be removed for legitimate disposal in a licensed landfill or legitimately recycled.

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Please respond to this letter within 15 days detailing your actions taken to abate the above cited violations. Please contact me at 740/380-5219 if you have any questions regarding this inspection of the Crock C&DD facility.

Sincerely,



Peter C. Thompson
Division of Materials & Waste Management

PCT/mr

cc: Matt Boyer, Ohio EPA, DMWM
Nick Bryan, Ohio AGO