



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

August 8, 2013

Mr. Robert Leichman, Service Director
City of Trenton
11 East State Street
Trenton, OH 45067-1439

RE: Notice of Violation
City of Trenton Composting Facility, Butler County
Reg. No. 08-C4R-0936

Dear Mr. Leichman:

On July 25, 2013, I, representing Ohio EPA, Division of Materials and Waste Management (DMWM), Southwest District Office (SWDO), met with you in order to conduct a comprehensive annual compost facility inspection, including the associated record keeping, at City of Trenton Composting (Facility) located in Trenton, Ohio.

The purpose of this inspection was to determine compliance with Ohio's Compost Regulations. An on-site inspection was conducted and facility records were reviewed for compliance with Ohio Administrative Code (OAC) Rule 3745-560-400, 410, and 415.

Violations

The facility takes leaf compost annually from September through October and actively stores compost until March. Currently, you are recording monthly totals and putting that information in the annual report, rather than completing a weekly log of operations.

This is a violation of OAC Rule 3745-560-415(B)(2), which states:

Complete the log of operation at a minimum once per week at an active composting facility and once per month at an inactive composting facility.

Comments

During the facility inspection, I observed a pile of top soil in the eastern area of the facility; a pile of brush, generated from storm debris, in the central area of the facility; and the current area designated for compost windrowing in the southeastern area of the facility.

There were no compost windrows observed during the facility inspection. You informed me that leaf compost is stored at the facility during the season, late September through early February and at the latest early March. At that point, the compost piles are hauled to Tri State Landscape

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Supply where shredded and mixed with mulch and top soil. No money is exchanged as the city of Trenton gives the compost to Tri State Landscape Supply.

You informed me that City of Trenton has a burn permit from the local Fire Department to burn the brush at the compost facility. You mentioned that you plan on removing the brush from the compost facility boundaries.

Please be aware that open burning is not allowed under ORC Section 3734.03 which states in part:

No person shall dispose of solid wastes by open burning or open dumping, except as authorized by the director of environmental protection...

Please contact the Southwest Ohio Air Quality Agency at (513) 946-7777 regarding their regulations.

While conducting the facility inspection, I reviewed the facility plan drawing and compared it to existing conditions at the site. I observed a pile of hardfill materials within the facility boundary. A pile of stone was observed in the eastern area of the facility. A pile of mixed stone and dirt was observed in the northern area of the facility. This material is generated from water main break repairs and is temporarily stored on site until needed for back fill at water main break repair location. I observed asphalt grindings in the southern area of facility. The grindings are used as needed for road base, berming and constructing parking lots.

Following the inspection we returned to your office to conduct a review of the records and had a conference call regarding questions and clarifications concerning record keeping and current compost rules. The conference call included you, me, Barry Chapman and Jen Hagar with Ohio EPA, DMWM, CO.

I will conduct a re-inspection to check the log of operations, once the composting season starts.

If you have any questions or need additional information, please contact me in writing at the letterhead address above or by telephone at (937) 285-6647.

Sincerely,



Monte Bluebaum, RS
Environmental Specialist 2
Division of Materials and Waste Management

MB/kb

ec: Butler County Health Department, Chief of Environmental Services
Barry Chapman, Ohio EPA, Division of Materials and Waste Management, CO