



**Environmental
Protection Agency**

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

December 29, 2011

Re: Lawrence County
Lawrence County Transfer/Recycling Station
City of Ironton
IU Inspection, ODP00053*BP
Pretreatment

Mr. David Murphy, Site Engineer
Lawrence County Transfer/Recycling Station
Rumpke Waste Collection and Disposal Systems
10795 Hughes Road
Cincinnati, Ohio 45251

Dear Mr. Murphy:

On November 21, 2011, I inspected the Lawrence County Transfer/Recycling Station. The inspection was conducted to evaluate the facility's compliance with federal and state pretreatment regulations and its Indirect Discharge Permit (IDP). You, Mark Ramy, District Manager, and Chris Kelley, Facility Manager, represented Lawrence County Transfer/Recycling Station during the inspection.

General Facility Description

Lawrence County Transfer/Recycling Station receives recyclable materials and municipal solid wastes. Recyclable materials, including steel, aluminum, cardboard, plastics and office papers and newspapers are sorted and packaged. Solid wastes are received from private vehicles and commercial collection trucks and transferred onto large haul trucks for disposal at Beech Hollow Sanitary Landfill. The facility receives an average of roughly 260 tons of waste per day. Waste and recyclables are processed inside a building to minimize exposure to precipitation. Leachate is collected in trenches in the receiving and transfer areas then pumped to a 1500 gallon above ground storage tank. The facility also has a wash bay for cleaning truck exteriors prior to maintenance. Wastewater from truck washing flows to an oil water separator prior to storage in an 8,000 gallon underground storage tank. The separator is serviced by United Wastewater Services of Cincinnati. The leachate tank is equipped with a sumped loading pad to contain any leachate spills that may occur during loading of haul trucks.

Leachate and truck wash water are hauled to the City of Ironton POTW. Flow is estimated by weighing the haul trucks. Truck wash water averaged roughly 2000 gal per month, while leachate flow averaged roughly 800 gal per month during the past year. Sanitary wastewaters are disposed using an onsite septic system. Storm water is

collected and pumped to a sedimentation pond for evaporation or discharge to a tributary of the Ohio River.

Lawrence County Transfer/Recycling Station is regulated as a significant industrial user and holds an Ohio EPA indirect discharge permit.

Lawrence County Transfer/Recycling Station reported the following exceedances of effluent limits on effluent monitoring reports for the July through December 2010, and January through June 2011 reporting periods:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00402	pH, Minimum	1D Conc	5.0	4.84	7/14/2010
002	00402	pH, Minimum	1D Conc	5.0	4.19	8/24/2010

Required Actions

Part III Paragraph 4 of the IDP requires that samples be collected, preserved and transported in accordance with the methods set forth in 40 CFR 136. Samples collected in October, 2011 were reported to have temperatures above the specified temperature for proper preservation. Sample temperatures should be no more than 4°C upon arrival at the lab. Please describe how the facility will ensure proper preservation of the samples.

Recommended Actions

The leachate pump for the loading area sump failed several weeks ago. Leachate is now allowed to accumulate in the sump, then pumped to the haul truck. The leachate pump should be replaced as soon as practical to avoid any problems related to accumulation of the leachate in the underground sump.

Please respond to this letter in writing within 30 days. Please contact me at (740) 380-5423 with any questions.

Sincerely,



Fred J. Snell
District Representative
Division of Surface Water

FJS/dh

Enclosure

- c: John Haskins, Superintendent, Ironton WWTP
- c: Chris Kelly, Facility Manager
- c: Pretreatment Unit, DSW, CO

Pretreatment Compliance Inspection Report

A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
ODP00053*AP	OHP000225	November 21, 2011	3	S	2

B. FACILITY DATA

Name & Location of Facility Inspected	Entry Time	Permit Effective Date
Lawrence County Transfer/Recycling Station 190 Private Drive 1533 Ironton, Ohio 45638	10:30 a.m.	November 1, 2006
	Exit Time	Permit Expiration Date
	12:30 p.m.	October 31, 2011

Name(s) & Title(s) of On-Site Representative(s)	Phone Number(s)
David Murphy, Site Engineer Chris Kelley, Facility Manager	(513) 851-0122, Ext. 3161 (740) 534-9738, Ext. 6759
Name, Address, & Title of Responsible Official	Phone Number
Jay Roberts, Rumpke EEAD Director	(513) 851-0122

C. AREAS EVALUATED DURING INSPECTION

<u> S </u> Permit	<u> S </u> Flow Measurement	<u> S </u> Pretreatment
<u> S </u> Records/Reports	<u> S </u> Laboratory	<u> N/A </u> Compliance Schedules
<u> S </u> Operations & Maintenance	<u> S </u> Effluent/Receiving Waters	<u> M </u> Self-Monitoring Program
<u> S </u> Facility Site Review	<u> N/A </u> Sludge Storage/Disposal	<u> </u> Other
<u> </u> Collection System		

(S = Satisfactory; M = Marginal; U = Unsatisfactory; N = Not Evaluated; N/A = Not Applicable)

D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

See attached letter.

Fred J. Snell
Fred J. Snell, Inspector, Ohio EPA, Southeast District Office

12/29/11
Date

Jennifer M. Witte
Jennifer M. Witte, Reviewer, Ohio EPA, Southeast District Office

12/29/11
Date