



**Environmental
Protection Agency**

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

June 11, 2012

RE: WASTE MANAGEMENT GENEVA LANDFILL
OHIO EPA PERMIT 3II00192
GENEVA TOWNSHIP, ASHTABULA COUNTY
COMPLIANCE EVALUATION INSPECTION

Mr. Evan Jahn, Operations Manager
Waste Management Inc.
USA Waste Geneva Landfill, Inc.
4339 Tuttle Road
Geneva, OH 44041

Dear Mr. Jahn:

On June 7, 2012, a site inspection was conducted at the above referenced facility at 4339 Tuttle Road, Geneva Township, Ashtabula County. The inspection was conducted by John Schmidt and Michael Beaty of this office. You and Scott Herman represented Geneva Landfill, Inc (GLI), a part of Waste Management, Inc. The purpose of the inspection was to evaluate the facility's compliance status with respect to the terms and conditions of the facility's National Pollutant Discharge Elimination System (NPDES) permit. The last compliance inspection was conducted on May 23, 2011.

Industrial Wastewater Management

Industrial process wastewater is limited to collection of leachate from the municipal solid waste landfill, which is collected in above-ground tanks and hauled off-site to a publicly owned treatment works (POTW), currently the City of Ashtabula Wastewater Pollution Control Facility (WPCF). The leachate collection system is regulated under a solid waste disposal facility permit by Ohio EPA's Division of Materials and Waste Management (DMWM), formerly the Division of Solid and Infectious Waste Management (DSIWM). Therefore leachate management at this facility is not a part of NPDES Permit 3II00192.

Storm Water Management

Storm water runoff collected from the 436 ac facility includes both a 48.6 ac active solid waste disposal area and 22 ac inactive solid waste disposal area, onsite roadways and parking areas, roll-off box storage areas, as well as borrow pits used as a source of soil cover materials and liner construction. Storm water is collected by a variety of let-down structures, ditches, and channels, and is collected in one of two sedimentation ponds known as the west sedimentation basin and the northeast sedimentation basin. The west sedimentation basin discharges to an unnamed tributary to Crowles Creek through Outfall 001, and the northeast sedimentation basin discharges to another unnamed tributary to Crowles Creek through Outfall 002.

Sanitary Waste Management

Sanitary waste is limited to employee restrooms and locker rooms, and is collected and flows to an onsite treatment system, which is not a part of National Pollutant Discharge Elimination System (NPDES) Permit 3II00192. An inspection of the mound system found no soft spots or outbreaks. During the inspection, you discussed relocating the office and the sanitary treatment system. This

will require that Waste Management to submit a permit-to-install (PTI) for the relocated sanitary treatment system.

Ohio EPA also notes that Waste Management Renewable Energy, LLC applied for a PTI for a 50-gpd onsite sanitary treatment system for a waste-to-energy building that is proposed adjacent to the Geneva Landfill. The PTI application is pending with Ohio EPA.

Observations

The following observations were made during the inspection:

1. No discharge was observed at either Outfall 001 or Outfall 002 during the inspection.
2. Leachate continues to be hauled to either the City of Ashtabula WPCF for treatment and disposal in 2012. A total of 2,438,400 gallons of leachate were hauled from the Geneva LF in 2011; and 685,900 gallons were hauled from the closed Doherty LF in 2011.
3. The sedimentation basins were found in overall satisfactory condition. Silt traps have been installed immediately upstream of each sedimentation pond. Silt curtains have been purchased and are onsite but have yet to be installed. Silt curtains will be installed as soon as the pond water levels return to normal levels. Ponds have been dredged of sediments. The basins are inspected weekly and are dredged as prescribed by the facility's solid waste permit. The NPDES permit addresses the discharges from these ponds only, as well as portions of the storm water collection system that are outside of the jurisdiction of the solid waste permit. Plant equipment was found reasonably clean and operational.
4. Mr. Jahn and Mr. Herman indicated that the sedimentation ponds were dredged annually, with the northeast pond dredged in November 2011 and the west pond dredged in March-April 2012. Silt traps, rock dams, and channels were cleaned in March-April 2012.
5. No discharge was noted from either sedimentation pond. Water levels in each pond were noted as several feet below the standpipe at each pond.
6. A log book of inspections, repairs and observations is maintained at the landfill. The storm water treatment system is operated by GLI staff. Mr. Jahn performs routine operations at the wastewater treatment system, monitors the facility, and performs the pH sampling. GLI submits the electronic discharge monitoring report (eDMR) through Ohio EPA's Web-based application. Quarterly and annual analytical work is sent to Geochemical Testing Laboratories for analysis.
7. Documents inspected during the site visit include the facility storm water pollution prevention plan (SWPPP), and appears to have been updated in January 2012 and June 2012. The latest annual site certification inspection was conducted on January 18, 2012 and June 5, 2012. Employee training on the SWPPP was conducted on March 6, 2012.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period April 1, 2011 through May 1, 2012 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violations were noted for the time period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
001	00530	Total Suspended Solids	30D Conc	30	72.	3/1/2012
001	00530	Total Suspended Solids	1D Conc	45	72.	3/5/2012

GLI responded to these violations on March 20, 2012 with a plan of action to add sediment traps at the headworks of the sedimentation ponds and install siltation curtains in each pond and schedule sediment removal from ditches, silt traps, and rock dam cleanouts as soon as possible. The west pond was dredged in March-April 2012. No further information is needed to respond to the violations.

Reporting Violations

No reporting code or reporting frequency violations were noted for the period reviewed.

Compliance Schedule

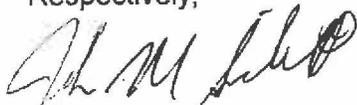
The NPDES permit does not contain a compliance schedule.

NPDES Permit Modification Status

Ohio EPA notes that your current NPDES permit contains Outfalls 001 and 002, and expires on February 28, 2017. From discussions with Ohio EPA's Division of Materials and Waste Management (DMWM), we understand that additional ponds and associated outfalls are proposed to be constructed associated with the pending solid waste expansion permit. Ohio EPA must have a permit modification reflecting any additional outfalls as soon as possible.

If you have any questions or comments regarding this inspection, please feel free to contact me at (330) 963-1175.

Respectively,



John M. Schmidt P.E., R.S.
Environmental Engineer
Division of Surface Water

JMS/cs

File: Industrial/Waste Management Geneva Landfill/P/C