



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

June 24, 2013

RE: WASTE MANAGEMENT GENEVA LANDFILL
OHIO EPA PERMIT 31100192
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 18, 2013, 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 of this office. You 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 June 7, 2012.

GLI received an NPDES permit modification to add additional outfalls associated with additional sedimentation ponds from the proposed expansion of its landfill. GLI received the NPDES modification on September 10, 2012, which added Outfalls 003, 004, and 005 to existing Outfalls 001 and 002. GLI received its permit-to-install (PTI) from Ohio EPA for the expansion of the landfill on May 28, 2013. GLI has not yet started to execute the expansion PTI.

Industrial Waste Water 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 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 31100192.

Storm Water Management

Storm water runoff collected from the 436 ac facility includes both a 48.6 ac active solid waste disposal area and a 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. On May 28, 2013, GLI received a PTI to expand the landfill, including the construction of new sedimentation basins. As of the date of this inspection, the sedimentation basins have not been constructed, therefore Outfalls 003, 004, and 005 have not been constructed yet. GLI is currently in the process of constructing its new unit, but has not yet constructed associated sedimentation basins.

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 NPDES Permit 3II00192. On October 22, 2012, Ohio EPA issued a PTI for a new onsite sanitary system to serve the proposed relocation of the scale house and landfill office. The office was relocated in November 2012 and the new onsite sanitary treatment system was also constructed in November 2012. An inspection of the mound system for the new sanitary system found no soft spots or outbreaks.

Ohio EPA also notes that Waste Management Renewable Energy, LLC was issued a PTI for a 50 gpd onsite sanitary treatment system for a waste-to-energy building that is adjacent to the Geneva Landfill. An inspection of this system indicates that it is operating as designed.

Observations

The following observations were made during the inspection:

1. Leachate continues to be hauled to the City of Ashtabula WPCF for treatment and disposal in 2012 and 2013. A total of 2,809,000 gallons of leachate were hauled from the Geneva LF in 2012; and 768,000 gallons were hauled from the closed Doherty LF in 2012. Leachate is collected and managed under GLI's solid waste permit, and treatment and disposal of the leachate occurs through the City of Ashtabula's NPDES permit, and is not a part of GLI's NPDES permit.
2. The sedimentation basins were found in overall satisfactory condition. Silt traps have been installed immediately upstream of each sedimentation pond. Silt curtains have been installed on the West Pond; and have been purchased but not yet onsite for the Northeast Pond. Silt curtains will be installed on the east Pond within the next few weeks. 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.
3. Mr. Jahn and Mr. Herman indicated that the sedimentation ponds are dredged annually, with the Northeast Pond dredged between April 9 and 26, 2013 and the West Pond dredged between November 20 and 30, 2012. Silt traps, rock dams, and channels were cleaned in November 2012 and again between April 9 and 26, 2013.
4. A discharge was noted at both Outfalls 001 and 002. The discharges were noted of acceptable visual quality free of turbidity, color, and odor.
5. 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.
6. Documents inspected during the site visit include the facility storm water pollution prevention plan (SWPPP), and appears to have been updated on November 25, 2012 to reflect the new NPDES permit. The latest annual site certification inspection was conducted on June 5, 2012, with the annual inspection for 2013 scheduled within the next two weeks. Employee training on the SWPPP was conducted on April 17, 2013.

NPDES Permit Compliance Review

A review of the electronic discharge self-monitoring reports (eDMRs) received by Ohio EPA for the period May 1, 2012 through June 1, 2013 indicates apparent noncompliance of the terms and conditions of your NPDES permit. Specific instances of noncompliance are as follows:

Limit Violations

The following limit violation is noted for the time period reviewed:

Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
002	00530	Total Suspended Solids	30D Conc	30	35	3/1/2013

GLI responded to this violation on April 9, 2013 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 northeast pond was dredged between April 9, 2013 and April 26, 2013. Silt curtains, which have proven effective on the West Pond, have been purchased and GLI is awaiting delivery. No further information is needed to respond to the violation.

Reporting Violations

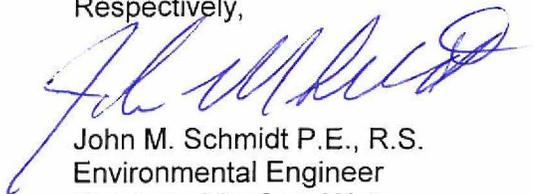
No reporting code or reporting frequency violations were noted for the period reviewed.

Compliance Schedule

The NPDES permit does not contain a compliance schedule.

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/PC