



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

Re: Seneca County
Sunny Farms Landfill
Premise # 0374010199
Resolution of Violation

July 17, 2013

Mr. Ed Brdicka, Vice President
WCA, LLC
12500 County Road 18
Fostoria, Ohio 44830

Dear Mr. Brdicka:

This letter shall serve as a follow-up to Notice of Violation (NOV) letters dated September 30, 2011 and May 3, 2012, for the above-referenced facility. The purpose of this letter is to indicate Sunny Farms Landfill's resolution of violations associated with the rail car unloading station (F003). This was accomplished by the following:

1. The facility supplied a compliance plan dated November 28, 2011 in response to the Division of Air Pollution Control (DAPC)'s NOV issued September 30, 2011 regarding emission unit F003. This compliance plan focused on minimizing and/or eliminating fugitive dust through operational practices and the use of the current building/enclosure.
2. The facility supplied an amended compliance plan dated June 1, 2012 in response to DAPC's NOV issued May 3, 2012 regarding emission unit F003. The facility's compliance plan indicated that management was continuing to adhere to the November 28, 2011 compliance plan and in addition would engage a contractor to design and install strip curtains in the openings of the railcar unloading building. However, during the compliance inspection conducted on June 5, 2013, it was identified that the facility has not installed the strip curtains and does not believe the strip curtains would be a viable solution to control fugitive emissions from the railcar unload building. The facility indicated in a letter dated July 5, 2013, that due to the size and configuration of the building enclosure's openings, it was determined that strip curtains would only be introduced if operator's material handling improvements failed to control fugitive emissions from F003 operations.
3. Miranda Garlock and Andrea Odendahl of DAPC observed the railcar unloading operations during the compliance inspection conducted on June 5, 2013. The facility identified, and DAPC observed, that the facility had completed measures outlined in its November 28, 2011 compliance plan, including repairing tailgates, the water spray pump inlet flow, the south railcar spray bar, and the west wall enclosure. In addition, the facility started conducting a monthly pump inspection program and continues to minimize drop height.

Mr. Ed Brdicka, Vice President
July 17, 2013
Page 2

During the June 5, 2013 compliance inspection, DAPC personnel did not identify any visible fugitive emissions generated by the unloading operations which were not confined to the building enclosure. In addition, Ms. Garlock observed the unloading operations from Township Road 108 on June 7, 2013 and no visible emissions were observed exiting the building.

4. It appears that the current control measures that have been put in place by the facility are sufficiently functioning to control fugitive emissions from F003 based on recent inspections conducted on June 5, 2013 and June 7, 2013 of this emission unit.

Please note that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violations noted in the NOV letters. The decisions on whether to pursue or decline to pursue such penalties regarding this are dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

Should you have any questions and/or comments concerning this letter, please feel free to contact me at (419) 373-3069 or electronically at Miranda.Garlock@epa.ohio.gov.

Sincerely,



Miranda R. Garlock
Division of Air Pollution Control

/cg

ec: Miranda Garlock, NWDO, DAPC
Mohammad Smidi, NWDO, DAPC
Andrea Odendahl, NWDO, DAPC
Jennifer Jolliff, NWDO, DAPC
Mark Budge, NWDO, DAPC
Bruce Weinberg, CO, DAPC
Brian Dickens, US EPA, Region V
Joe Frola, WCA of Ohio, LLC