

MAHONING-TRUMBULL AIR POLLUTION CONTROL AGENCY

A Division of the Youngstown City Health District

OAKHILL RENAISSANCE PLACE

2nd Floor - Room 25

345 Oak Hill Avenue

Youngstown, Ohio 44502-1454

Phone (330) 743-333 ext 282

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RECEIVED

JUL 05 2011

OHIO EPA NEDO

June 29, 2011

RE: Carbon Limestone Sanitary Landfill
DAPC Facility ID #0250070850
2011 Air PTI Inspection Report
Mahoning County

Re: Notice of Violation for Fugitive Dust Exceedences

Mr. Michael T. Heher
Division Manager
Carbon Limestone Landfill LLC.
8100 South Stateline Road
Lowellville, OH 44436

Dear Mr. Heher:

On June 13, 2011 and June 20, 2011 the Mahoning-Trumbull Air Pollution Control Agency (M-TAPCA) performed a compliance inspection of Carbon Limestone Landfill located at 8100 South Stateline Road Lowellville, OH 44436. This inspection was performed to assess the facility's compliance status with its Title V operating permit and various permits to install. Dust emissions from Paved and Unpaved Roadways and Parking Areas (F001), and fugitive dust emissions from Landfill Operations including two landfill gas enclosed combustors, and material handling and wind erosion at the working face (F002) were evaluated at this time.

Visible emission readings were performed at three active working faces of the landfill operations and the enclosed combustor flares on June 13, 2011 and June 20, 2011. No violations of the visible emission limitations were observed at any of the landfill active working face locations or from the enclosed combustor flares.

Two violations were observed on June 20, 2011 at the Paved and Unpaved Roadways (F001). Permit to install (PTI) P0105125 issued August 5, 2009 states that there shall be no visible PE (particulate emissions) except for one minute during any sixty minute period at the paved roadways and parking areas, and no visible PE except for three minutes during any sixty minute period at the unpaved roadways and parking areas. At the time of inspection, three minutes and seventeen seconds of visible particulate emissions were observed at the paved roadway (F001) in

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REPRESENTING THE OHIO ENVIRONMENTAL PROTECTION AGENCY IN MAHONING AND TRUMBULL COUNTIES

10/21/2011

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a thirty minute period and four minutes and twenty seven seconds were observed at the unpaved roadway (F001) in a sixty minute period.

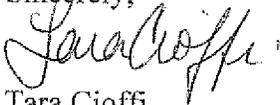
In accordance with the permittee's PTI, the permittee has committed to treat the paved and unpaved roadways and parking areas with water via a spray truck and/or sweeping at sufficient treatment frequencies and to maintain and enforce speed limits sufficient to ensure compliance with the visible emission limitations of the permit. The permittee shall employ best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust.

Please be advised the facility is in violation of OAC rule 3745-31-05(A)(3) and the permit to install P0105125 effective August 5, 2009. Be advised that violations of state air pollution regulations are punishable by a civil penalty of \$25,000 per violation. Issuance of this notice does not excuse past violation of federal, state and local laws regarding air pollution. This office reserves the right to pursue violations of air pollution regulations in the form of a referral to Ohio EPA's Central Office.

Please provide a written response within 14 days of receiving this letter that includes a compliance plan describing what measures will be taken to correct this NOV and the time frame in which it will be implemented.

Should you or your staff have any questions, please contact me at (330)743-3333 ext. 283.

Sincerely,



Tara Cioffi
Registered Sanitarian

cc: Amysue O'Reilly, Ohio EPA, DAPC – NEDO
Tom Kalman, Ohio EPA, DAPC-CO
Mary Helen Smith, Environmental Director, MCDBOH
Timothy Nytra, Allied Waste (Imperial Landfill, 11 Boggs Road P.O. Box 47 Imperial, PA 15126)
Curt Holes, Air Quality Specialist (2366 Golden Mile Hwy #470, Pittsburgh, PA 15239 (curth@airqualityspecialist.com))