



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 24, 2008

CERTIFIED WARNING LETTER

02 47000760

Mr. Chris Jacquet
Environmental Manager
BFI Lorain County Landfill
43502 Oberlin Elyria Rd.
Oberlin, OH 44074

Dear Mr. Jacquet:

Thank you for the courtesy that you extended to Tim Fischer and me during our site inspection of the Lorain County Landfill on Tuesday, September 23, 2008. As you were aware, the inspection was conducted to determine Lorain County Landfill's compliance status with their Title V Permit and any associated permits-to-install (PTIs).

The inspection consisted of records review and a drive through and around the facility. The following is a summary of the inspection of each emissions unit.

F001 – Roadways and Parking Areas

- Upon arrival, the roads were damp and there was no evidence of a fugitive dust problem.
- The roadway watering records were reviewed and found to be satisfactory. A copy of a watering report was obtained.
- During the inspection, the water truck was seen spreading water around the roadways of the landfill.
- I was informed that an employee is assigned watering duties as a full-time position.
- The watering truck is now a vacuum truck that is able to fill its holding tank with a self-contained pump mounted to the truck.

F002 – Landfill Operations

- Solid waste was observed being dumped, pushed, and compacted at the working face where I made a cursory look for tires and asbestos bags, none were seen.
- There was the odor of landfill waste as we approached the working face, but that is to be expected.
- The amount of birds in the area was a nuisance.

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- The landfill gas (LFG) control system was investigated. BFI operates a new 5500 cfm enclosed combustor and a 3000 cfm open flare combustor, as well as a 2000 cfm enclosed combustor at the older Lorain County Landfill #1 (LCLF1) site, which is closed. At the time of the inspection, the 5500 cfm combustor was operating at a LFG flow rate of 1815 cfm and a temperature of 1680 degrees Fahrenheit, the 3000 cfm open flare was operating at a LFG flow rate of 1100 cfm (flare temperature is not recorded)
- 8-LFG engines were in operation by the 3000 cfm open flare. These engines are owned and operated by another facility that has Division of Air Pollution Control (DAPC) permits in place.
- Copies of strip chart recordings from the LFG control equipment were obtained. The strip charts indicated the control equipment has not exceeded their permitted flow rates.

It is my understanding that the well field of the landfill is monitored by Air Quality Specialist, Inc (AQSI) and the surface of the landfill is monitored by an employee of BFI. I would like to be informed, in writing, at least two weeks prior to future surface monitoring and wellhead monitoring, as I would like to witness the monitoring and recording of the information.

Insignificant Emissions Units (as identified in the Title V Permit)

Storage Tanks (T001, T002, Z001)

The Title V Permit lists two 300,000 gallon leachate tanks at the active landfill area; however, these have been replaced by one 400,000 gallon tank. The old LCLF1 site has two leachate tanks, one 20,000 gallon and one 31,000 gallon.

The Title V Permit lists one 8000 gallon condensate tank at the LCLF1 site; this tank is still present.

Gasoline Dispensing Operations (G001, G002)

The Title V Permit lists two such operations and both are still operational. The operations at the Lorain County Resource Recovery (LCRR) makes use of 3 smaller storage tanks: 300 gallon gasoline; 500 gallon on-road fuel; and 1500 gallon off-road fuel.

Compost Operations (F003)

BFI has decided to stop all composting operations at the Lorain County Facilities operations. While several small compost storage piles (owned by BFI) were present, BFI is in the process of removing the material. This emissions unit will be removed from the Title V upon permit renewal.

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Engines (P002, P003, P004, P005, P006, P007)

Many of these engines (P002, P003, and P004) were removed in the spring of 2008 when BFI decided to stop composting operations. One engine is used for spare parts (P005) and will be removed from the permit. Therefore, only P006 (43 hp) and P007 (48 hp) are still on-site and operational. Records for P002 (750 hp) and P003 (362 hp) engines indicate that the permit restrictions on fuel usage were exceeded for each engine.

The fuel usage records, from P002 and P003, did not indicate the amount of fuel used on an hourly basis, as required by the PTI. And no fuel usage records were available for P004, P005 or P006, which were also required by the PTI. This lack of records indicates non-compliance with the terms and conditions of the respective PTIs. It is highly recommended that BFI read and follow all of the terms and conditions of all permits issued to them.

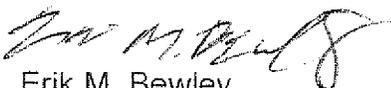
Other pieces of equipment

- Two light plants were noticed while we were driving through the facility. It was noted that they were each rated 40 hp. **Please submit within three weeks of receipt of this letter, the fuel usage and hours of operation that these light plants have operated in the years 2007 and 2008. Also, please include any manufacturer's emissions data for the pieces of equipment.**
- A tipper trailer was noticed while we were driving through the facility. It was noted that it has a rating of 108 hp. **Please submit within three weeks of receipt of this letter, the fuel usage and hours of operation that this tipper trailer has operated in the years 2007 and 2008. Also, please include any manufacturer's emissions data for the piece of equipment.**

Please note that emissions units that potentially emit more than 10 pounds per day of any criteria pollutant require a PTI, unless exempted under OAC rule 3745-31-03 or OAC rule 3745-15-05.

Should you have any questions or concerns regarding this letter, please feel to contact me at (330) 963-1252 or via e-mail at erik.bewley@epa.state.oh.us.

Respectfully,



Erik M. Bewley
Environmental Specialist
Division of Air Pollution Control

pc: Ed Fasko, NEDO, DAPC
New Russia Township Trustees
Clarissa Gereby, NEDO, DSIWM

EMB:bo