



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

August 31, 2007

RE: NOTICE OF VIOLATION  
BFI LORAIN FACILITIES  
OPERATING GAS WELLS IN  
VIOLATION OF NSPS WWW

BFI Lorain Facilities  
Attn: Mr. Chris Jaquet  
43502 Oberlin-Elyria Road  
Oberlin, Ohio 44074

02 4700 0760

Dear Mr. Jaquet:

On July 30, 2007, Ohio EPA, Northeast District Office (NEDO), received the BFI Lorain County Facilities' first semiannual report for 2007. In this report, BFI disclosed the well head deviations for both the Lorain 1 and 2 landfills. This report indicates that BFI is operating a number of wells in violation.

The New Source Performance Standards for municipal solid waste landfills (NSPS WWW, 40 CFR parts 60.750-60.759) requires that landfills that are required to install and operate a gas collection and control system (GCCS) maintain individual gas wells at a temperature not to exceed 55°C (131°F), oxygen not to exceed 5%, and at negative pressure (pursuant to 40 CFR 60.753(c)). If an exceedence occurs, the landfill operator is to initiate corrective measures within five (5) days. If correction of the exceedence cannot be achieved within 15 calendar days of the first measurement, the gas collection system shall be expanded to correct the exceedence within 120 days of the initial exceedence (pursuant to 40 CFR 60.755(C)(5)).

According to the first semiannual report for 2007, BFI has a number of wells that have operated with elevated parameters for over 120 days, which means the GCCS cannot be expanded within 120 days of the initial exceedence. This is an obvious violation of NSPS WWW and permit-to-install (PTI) number 02-17061. Within fifteen (15) days of receipt of this letter, please submit to this office a schedule for expanding the GCCS to correct these violations.

If you have any questions, please do not hesitate to contact me at (330) 963-1258 or my supervisor Bob Princic at (330) 963-1230.

Sincerely,

Joseph C. Loucek, III  
Environmental Specialist  
Division of Air Pollution Control

LCL:bo

cc: Bob Princic, DAPC-NEDO  
Tom Kalman, CO-NEDO  
Lisa Holscher, US EPA Region 5  
Clarissa Gereby, DSIWM-NEDO  
Jerry Parker, DSIWM-NEDO