

February 17, 2022

Ms. Jennifer Carlin, Environmental Specialist
Division of Materials and Waste Management
Ohio EPA
Northeast District Office
2110 East Aurora Ave
Twinsburg, OH 44087

Dear Ms. Carlin,

The Complainant has reviewed the past several months of both CEC's hydrogen sulfide scan reports as well as the Lordstown Construction Recovery Landfill's (LCR) weekly scan reports.

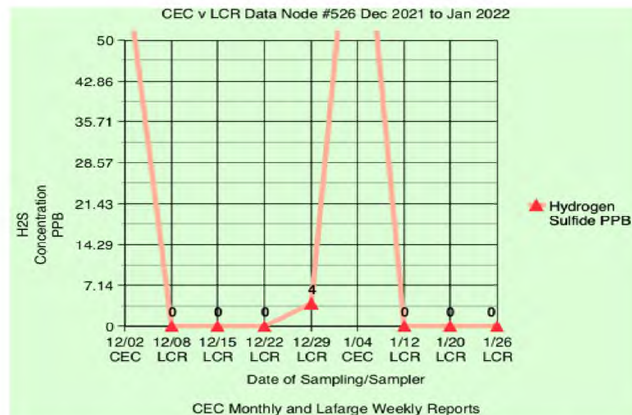
After review, certain anomalies become apparent. Repeatedly, LCR's required weekly hydrogen sulfide re-surveys, of the nodes that were found by CEC consultants to be greater than 20 ppb, are reported as zero or near-zero ppb. At first glance this would seem likely since LCR must follow the 11/23/2016 consent order and cover any 100' x 100' node area of exceedance with a minimum of six inches of soil.

However, again and again, when CEC performs the next monthly H₂S scan, the H₂S concentration for these exact same nodes suddenly jumps back up. This occurs even if CEC's measurements were within a few days of LCR's most recent 0 ppb readings. The frequency of these occurrences, as well as the extreme differences of these toxic gas readings, are beyond coincidence and cannot be easily explained by natural science.

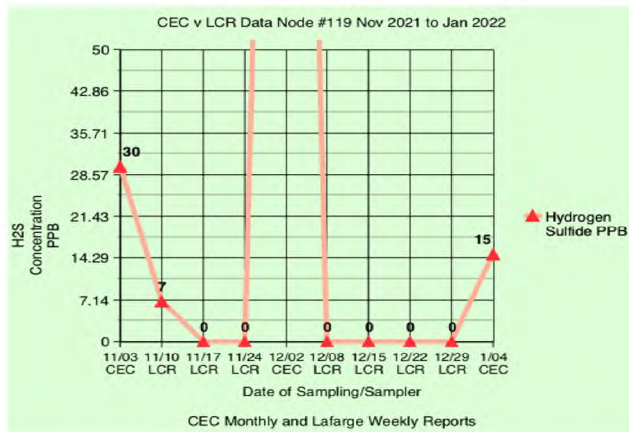
The following six graphs illustrate the situation:



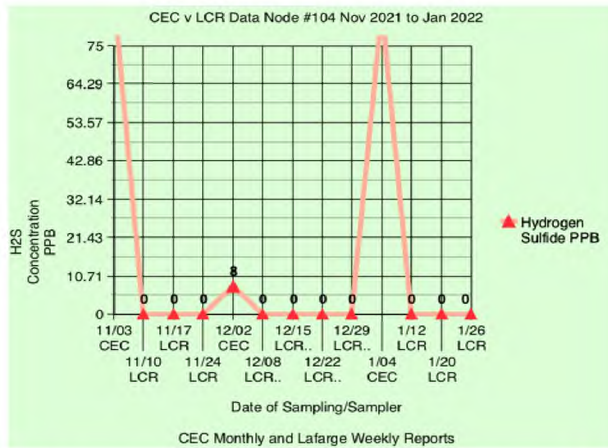
Node #13 Average CEC H₂S reading (N=2): 38.5 ppb
Average LCR H₂S reading (N=7): 0.0 ppb



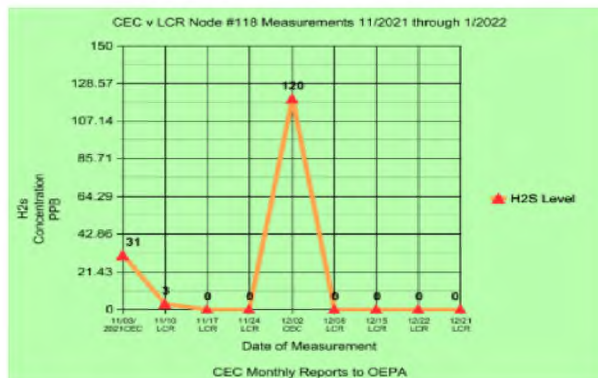
Node #526 Average CEC H₂S reading (N=2): 60.5 ppb
Average LCR H₂S reading (N=7): 0.6 ppb



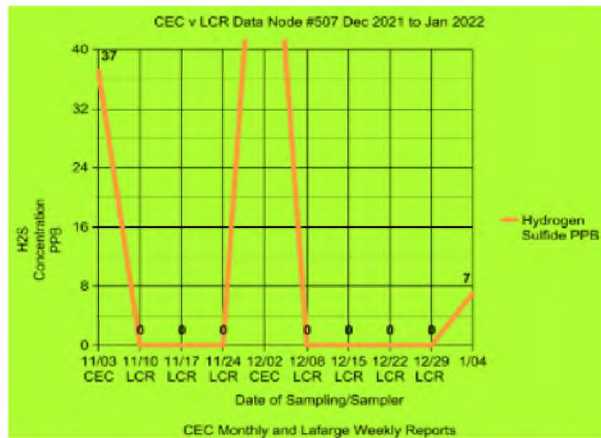
Node #119 Average CEC H₂S reading (N=3): 105.0 ppb
Average LCR H₂S reading (N=7): 1.0 ppb



Node #104 Average CEC H₂S reading (N=3): 60.7 ppb
Average LCR H₂S reading (N=7): 0.0 ppb



Node #118 Average CEC H₂S reading (N=2): 75.5 ppb
Average LCR H₂S reading (N=7): 0.4 ppb



Node #507 Average CEC H₂S reading (N=3): 40.6 ppb
Average LCR H₂S reading (N=7): 0.0 ppb

LCR’s weekly re-surveys do not correlate well with CEC’s independent measurements. The probability of having high emissions at the Lordstown Landfill only when independent consultants perform the work, month after month, is infinitesimally low.

There are a number of nodes where LCR’s “0” ppb readings match CEC’s zero readings. But if nearly everything is listed as “0” on LCR’s weekly reports, then it is inevitable that there will be some matches on the third party monthly reports.

However, if the goal of weekly re-testing is to demonstrate that LCR has properly corrected the problems causing the exceedances, *this system doesn’t work*. CEC’s variable monthly results are actually a function of changing weather conditions, soil saturation, wind speed and direction and are demonstrably *not* a result of anything the Lordstown Landfill claims to be doing.

-The Complainant requests that future monthly and weekly reports include weather data such as temperature, barometric pressure, wind direction and speed as well as precipitation. This will help to better identify any progress, or not, in reducing toxic emissions more than meaningless reports of “0 ppbs” will.

LCR’s weekly reports are clearly not credible and undermine the goal of getting control of LCR’s poisonous emissions, odors, neighbor and worker complaints and health issues. The Complainant has stated in an earlier correspondence that he is directly aware that LCR staff previously reported false H₂S results.

-The Complainant requests that the Ohio EPA require a qualified third party consultant to assume responsibility of the weekly H₂S re-surveys until SCS’s landfill gas control system is operational at LCR.

-The Complainant again requests that the Ohio EPA require LCR to monitor for the other toxic gases that are not detectable by the current meters being used.

Sincerely,

Mark Schmidt
Complainant

CC by email or certified post:

- Vlad Cica, Chief, OEPA, DMWM
- Jennifer Kurko, Assistant District Chief, NEDO
- Lynn Sowers, Supervisor, NEDO

- Bruce McCoy, Enforcement Chief, Central Office
- Aaron Shear, Enforcement, Central Office
- Ohio Department of Health, Health Assessment Section, Columbus
- USEPA, Region 5, Westlake, OH
- Donnie Blatt, Director, United Steel Workers Union, Columbus
- WKBN -TV 27
- Warren Tribune
- Trumbull County Combined Health District Board members
- Mayor Arno Hill, Village of Lordstown
- Ronald Radka, Village of Lordstown Council President
- Howard Sheely, Village of Lordstown Councilman, Lafarge Employee
- Robert Kovac, Lordstown
- Brian Sechler, Lordstown
- Kevin Moyer, LCR Lordstown
- Kenneth Rogers, Great Lakes General Manager, Lafarge Cleveland
- Jillian Eberly, East Coast Market Manager, Lafarge, Cleveland
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- Robert McGehee, Environmental Director, Lafarge NY
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