



**Division of Materials and Waste Management  
Response to Comments**

**Subject:** City of Toledo - Hoffman Road Landfill  
Permit-to-Install Application No. 1271144  
Vertical Expansion

**Re:** Hoffman Road Landfill; Permit-to-Install (PTI) Vertical Expansion (PTI 1271144) - Long Term; Public Response; Municipal Solid Waste Landfills; Lucas County; MSWL018751

**Agency Contacts for this Project**

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Ohio EPA held a public hearing on April 26, 2021, concerning a draft permit-to-install (permit) issued to City of Toledo – Hoffman Rd Landfill for a vertical expansion of the Hoffman Road Landfill (Facility) located at 3962 Hoffman Road, Toledo, Ohio 43611, Lucas County. This document summarizes the comments and questions received at the public hearing and during the associated public comment period, which ended on May 3, 2021.

Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

**Comment 1:** Citizens raised concerns regarding odors and contamination of the Ottawa River.

**Response 1:** Hoffman Road Landfill must comply with Ohio Administrative Code (OAC) Rule 3745-27-19(B)(3) & (B)(5) and the terms and conditions of the issued permit. Odor control measures include daily, intermediate, and final covering of the waste and the use of a gas collection and control system (GCCS) to minimize the landfill gas release. As the landfill expands, the Facility will also expand the GCCS. Anyone wishing to log a complaint regarding odors believed to be coming from the Facility can do so with Ohio EPA at 419-352-8461 and/or the Toledo-Lucas County Health Department at 419-213-4100.

Regarding the second part of the comment, Ohio EPA has reviewed the permit application and determined that it meets the requirements of Ohio's environmental regulations. These regulations are in part to guard against surface water contamination. All water that comes into contact with waste is required to be collected and treated off-site through a wastewater treatment plant. It is not discharged to the Ottawa River. All water that comes into contact with the ground on the landfill property that does not come into contact with waste is managed through the Facility's surface water management system. Any of this water that is discharged from the property is routed through a sedimentation basin that has a discharge permit issued and overseen by Ohio EPA's Division of Surface Water to ensure that the discharge is acceptable and compliant.

**Comment 2:** A citizen raised a concern regarding increased height of the landfill and a past agreement with the City of Toledo to cap the landfill at 40 feet.

**Response 2:** The height of solid waste landfills in Ohio is limited by a combination of factors including:

- Engineering considerations

- Local zoning
- Federal Aviation Administration guidelines (if the facility is near an airport); and
- State landfill design criteria

Ohio EPA reviewed the application and evaluated the design to ensure slope stability and compliance with siting criteria. The proposed expansion meets the minimum setback requirements and the appropriate factors of safety established in rule. Construction and waste placement activities will be monitored at the landfill throughout the life of the Facility to ensure that the Facility does not exceed the permitted height.

Ohio EPA is not aware of any agreement the City of Toledo may have made with a third party to limit the landfill height. Ohio EPA does not have the authority to enforce such agreements when reviewing permit applications for landfills in accordance with the applicable regulations. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. The Agency has reviewed the permit application and determined that it meets the requirements for landfill design and operation and can be issued.