



State of Ohio Environmental Protection Agency

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January 7, 2003

ENTERED DIRECTOR'S JOURNAL

Mr. Robert Kappler
Director of Public Service
City of Brooklyn
7619 Memphis Avenue
Brooklyn, Ohio 44144

I certify this to be a true and accurate copy of the
original document as filed in the records of the Ohio
Environmental Protection Agency.

Zona L. Clements 1/7/03

**Re: City of Brooklyn Sanitary Landfill, Cuyahoga County
Explosive Gas Monitoring Plan**

Dear Mr. Kappler:

On August 8, 1989, the Ohio Environmental Protection Agency (Ohio EPA) received the *Explosive Gas Monitoring System Design Report for the City of Brooklyn Sanitary Landfill, June 1989*. The report was prepared by Stephen Hovancsek and Associates, Inc. and McFadden and Associates, Inc., on behalf of the City of Brooklyn. The document was submitted as required by Ohio Administrative Code (OAC) Rule 3745-27-12, effective June 12, 1989.

Ohio EPA has reviewed the plan and found it to be in compliance with OAC Rule 3745-27-12, as effective June 12, 1989. Therefore, Ohio EPA approves the explosive gas monitoring plan for the City of Brooklyn Sanitary Landfill with the following conditions:

Conditions

1. Within 120 days of the date of this approval, the following information, as required by OAC Rule 3745-27-12(F), shall be submitted to Ohio EPA for review. Any revisions requested by Ohio EPA shall be submitted within 60 days of the date of such request.
 - a. A monitoring plan which includes the following information:
 - i. Monitoring frequency and parameters to be monitored, including detailed step-by-step instruction of the proper procedures to be utilized in conducting monitoring;
 - ii. Detailed step-by-step instructions of how to validate and evaluate field sampling results, including comparing the sampling results to the appropriate explosive gas threshold limit;
 - iii. Detailed step-by-step discussion of how to report sampling results to appropriate authorities;

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Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

- iv. Monitoring equipment manuals.
 - b. **A** contingency plan detailing steps to be taken upon the validated finding of explosive gas migration. The contingency plan shall provide for the following:
 - i. Verification of explosive gas concentrations by immediate retesting;
 - ii. Upon verification of a reading above the explosive gas threshold limit, immediate notification of the appropriate local public safety authorities, such as the local health district, fire department, police department, and the appropriate district *office of* Ohio EPA.
 - c. A certification report for the installation of the explosive gas monitors including the following information:
 - i. Record drawing showing the locations of all temporary and permanent monitors with their associated identification designations;
 - ii. Boring logs from the installation of each permanent monitor;
 - iii. Depth and length of screened intervals for each permanent monitor.
- 2. The City of Brooklyn shall monitor permanent or temporary monitors at the following minimum frequencies:
 - a. Monthly prior to closure;
 - b. Quarterly after closure activities are completed, unless the director approves an alternate frequency.
- 3. The City of Brooklyn shall monitor the following parameters at all permanent monitor locations:
 - a. Percent combustible gas by volume;
 - b. Gas pressure in the monitor;
 - c. Water level in the monitor;
 - d. Ambient barometric pressure;

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- e. Ambient air temperature;
 - f. Observed weather conditions;
 - g. Relative humidity.
4. Results of monitoring in accordance with conditions 2 and 3 shall be submitted to Ohio EPA, Northeast District Office (NEDO) and the Cuyahoga County Board of Health within 15 days of the date of sampling, except as specified in condition 7. The monitoring results shall also be submitted into the operating record in accordance with OAC Rule 3745-27-09.
5. This approval is for the explosive gas monitoring plan for the City of Brooklyn Sanitary Landfill, dated June 1989, and received on August 8, 1989.
6. The explosive gas threshold limit for each permanent and temporary monitor is either:
- a. 100 percent of the lower explosive limit at the facility boundary, or
 - b. 25 percent of the lower explosive limit in structures within the facility boundary.
7. The City of Brooklyn, upon the detection of explosive gas which equals or exceeds the explosive gas threshold limits specified in condition 6, shall:
- a. Take all necessary steps to ensure protection of human health and the environment;
 - b. Immediately notify Ohio EPA NEDO and the Cuyahoga County Board of Health;
 - c. Within seven days of detection, place in the operating record the explosive gas levels detected and the description of the steps taken to protect human health;
 - d. Within 60 days of detection, submit to the director a copy of the remediation plan and implement the plan. A copy of the remediation plan shall also be placed into the operating record in accordance with OAC Rule 3745-27-09.
8. Within 180 days of the date of this approval, the City of Brooklyn shall repair or replace any damaged, blocked, or otherwise compromised explosive gas vents.

9. Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state solid waste laws or regulations. Furthermore, this authorization shall not be interpreted to release the City of Brooklyn or others from responsibility under ORC Chapters 3704, 3714, 3734, or 6111; the Federal Clean Water Act, the Resource Conservation and Recovery Act, the Toxic Substances Control Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants from the facility to the environment.

You are hereby notified that this action of the Director of Environmental Protection is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to ORC Section 3745.04. The appeal must be made in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Commission within 30 days after notice of the director's action. A copy of the appeal must be served on the director within three days of filing with the Commission. An appeal may be filed with the Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions concerning this authorization, please contact Judy Bowman of Ohio EPA's Northeast District Office at (330) 963-1238.

Sincerely,



Christopher Jones
Director

CJ/JB/cl

cc: Katharina Snyder, DSIWM-NEDO
Eric Adams, DSIWM-NEDO
Vince Caraffi, Cuyahoga County Board of Health
Michael J. Stepic, P.E., R.S., URS