



State of Ohio Environmental Protection Agency

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Mr. Alan Ruffell  
City of Toledo Manager of Operations  
3962 Hoffman Road  
Toledo, OH 43608

**Re: Hoffman Road Landfill, Lucas County  
Decline to Authorize Use of Alternative Method to Update Background Data**

Dear Mr. Ruffell:

On February 25, 2005, Hull & Associates, Inc., on behalf of the City of Toledo, submitted a request to the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) to update the background data for ground water monitoring wells MW-2A, MW-7, MW-12, MW-13, MW-14, MW-14B, MW-15 and MW-23B at the Hoffman Road Landfill (facility) located in Lucas County. This request was submitted pursuant to OAC Rule 3745-27-10(C)(7)(g), which states:

Background data can be added only in blocks of data resulting from the analysis of four or more statistically independent samples after the data have been statistically compared to the current background data and no statistical differences are detected, unless another method is deemed acceptable to the director.

In the request, the City of Toledo proposes using another method of evaluation to justify updating background data because, after collecting and statistically comparing the samples to current background data, statistical differences were detected. The proposed method of evaluation is a demonstration that indicates the increases of ammonia in MW-2A, chloride in MW-7, MW-12, and MW-15, sodium in MW-13, MW-14, MW-14B, and MW-23B, and barium in MW-23B are not a result of impact from the facility.

Ohio EPA has reviewed the City of Toledo's request to use another method to update background data and does not concur that this method is acceptable. Therefore, pursuant to OAC Rule 3745-27-10(C)(7)(g), I hereby decline to authorize the City of Toledo to update background data for ground water monitoring wells MW-2A, MW-7, MW-12, MW-

13, MW-14, MW-14B, MW-15 and MW-23B at the facility using the method of evaluation proposed in the request.

Bob Taft, Governor  
Jennette Bradley, Lieutenant Governor  
Joseph P. Koncelik, Director

Mr. Allen Ruffell, City of Toledo  
Hoffman Road LF  
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A detailed account of Ohio EPA's review of the ground water demonstration will be sent to you under separate cover.

If you have any questions concerning this letter, please contact Mike Reiser of Ohio EPA, NWDO at (419) 373-3126.

Sincerely,

Joseph P. Koncelik  
Director

pc: Ms. Karen Okonta, Hull & Associates  
Mr. Mike Reiser, DSIWM, NWDO  
Mr. Mike Beal, DDAGW, NWDO  
gw Id#: 5-4979