



State of Ohio Environmental Protection Agency

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Ms. Connie Dall
Environmental Manager
Browning-Ferris Industries of Ohio, Inc.
5092 Aber Road
Williamsburg, Ohio 45176

**Re: Bigfoot Run Sanitary Landfill, Warren County
Corrective Measures Plan - Selection of Corrective Measure**

Dear Ms. Dall:

On December 21, 2005, the Ohio Environmental Protection Agency (Ohio EPA), Southwest District Office (SWDO) received a Corrective Measures Plan (CMP) submitted by Herst & Associates, Inc., on behalf of Browning-Ferris Industries of Ohio, Inc. (BFIO), for the Bigfoot Run Sanitary Landfill (Facility). The CMP was submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-27-10(F).

The Facility was in operation prior to 1968 and ceased accepting waste in May of 1999. The Facility currently has ground water monitoring wells in both the detection monitoring program and the assessment monitoring program.

In accordance with the January 2005 "Groundwater Quality Assessment Report" and the April 4, 2005, addendum, BFIO has determined the rate, extent, and concentration of waste derived constituents in ground water. BFIO has determined that the following wells are in assessment due to statistically significant changes in the noted constituents: MW-2A (ammonia, chloride), MW-3C (chloride, sodium), Z-108R (ammonia, barium, arsenic, chloride, potassium, sodium), Z-902A (barium, chloride, sodium), Z-509RD (ammonia), and Z-509RB (vinyl chloride). Monitoring wells MW-2A and Z-902A are screened in the uppermost aquifer system and all other wells are screened in significant zones of saturation. In the last several years, approximately 12 of the 22 monitoring wells have had statistically significant changes. These wells have been addressed by both assessment monitoring in accordance with OAC Rule 3745-27-10(E) and with demonstrations under OAC Rule 3745-27-10(D)(7)(c).

BFIO has submitted the CMP with a site-wide approach in defining constituent migration. Since the landfill has been capped, has an active gas extraction system, and has a leachate collection system, and because current ground water quality data indicate that the concentrations of constituents of concern are below proposed remediation standards, continued maintenance and operation of the Facility's engineered components was evaluated as a potential corrective measure. Through this evaluation, BFIO concludes that continued source control and ground

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water monitoring can be effective corrective measures.

Ohio EPA has reviewed the CMP and has determined the CMP fulfills the requirements of OAC Rule 3745-27-10(F). Therefore, pursuant to OAC Rule 3745-27-10(F)(10), I hereby select the following, which are the recommended actions outlined in Section 4.4 of the CMP, as the corrective measures that are to be implemented at the Facility:

- Continued maintenance of the synthetic and soil cap.
- Continued maintenance and operation of the active landfill gas extraction system.
- Continued maintenance and operation of the leachate collection system.
- Ground water monitoring in accordance with the Corrective Measures Monitoring Plan contained in Appendix A of the CMP.

BFIO shall implement the CMP and the Corrective Measures Monitoring Plan for all groundwater monitoring wells at the Facility and shall comply with the following conditions:

CONDITIONS

1. BFIO shall continue to maintain the synthetic and soil cap at the Facility.
2. BFIO shall continue to maintain and operate the active landfill gas extraction system at the Facility.
3. BFIO shall continue to maintain and operate the leachate collection system at the Facility.

END OF CONDITIONS

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

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If you have any questions regarding this letter, please contact Holly Hillyer of Ohio EPA, SWDO at (937) 285-6072.

Sincerely,

Joseph P. Koncelik
Director

cc: Larry Wisner, Warren County Combined Health District
Scott Hester, DSIWM, CO
Tracy Buchanan, DSIWM, SWDO