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October 24, 2006

Mr. Rick Dodge  
Solid Waste Authority of Central Ohio  
6220 Young Rd.  
Grove City, OH 43123-9518

**Re: Franklin County Landfill, Franklin Co., Core ID # 15005  
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Dodge:

On June 12, 2006, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Central District Office (CDO), received a document titled "March 2006 Sampling Event" dated June 9, 2006, for the Franklin County Landfill (Facility) located in Franklin County. This document was submitted by Mr. Rick Dodge of the Solid Waste Authority of Central Ohio, and contains the ground water sampling results and the statistical analysis from the March 30, 2006 ground water sampling event at the Facility. This document also contains a demonstration for monitoring well MW-6.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: chloride in monitoring wells MW-6a and MW-16B; alkalinity and barium in monitoring well MW-13B; alkalinity in monitoring well MW-16D and acetone in monitoring well MW-6D.

Verification sampling was performed on June 27 and July 24, 2006. Analysis of the re-sampling data demonstrated that the statistically significant change for alkalinity and barium in monitoring well MW-13B, and the statistical change in alkalinity in monitoring well MW-16D were false positives. Therefore, monitoring wells MW-13B and MW-16D were automatically returned to the detection monitoring program pursuant to OAC Rule 3745-27-10(D)(7)(c)(i). Ohio EPA acknowledges the return of these wells to the detection monitoring program. However, the re-sampling data verified the statistically significant change for chloride in monitoring well MW-16B and for acetone in monitoring well MW-6D.

Bob Taft, Governor  
Bruce Johnson, Lieutenant Governor  
Joseph P. Koncelik, Director



Pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator may demonstrate that a source other than the sanitary landfill facility caused the contamination, or that the statistically significant change resulted from error in sampling, analysis, or statistical evaluation or natural variation in ground water quality. A report documenting this demonstration must be submitted to and approved by Ohio EPA. If the owner or operator does not obtain approval to continue detection monitoring within two hundred ten (210) days from initial sampling, the owner or operator is required to comply with the provisions of OAC Rule 3745-27-10(E) for ground water quality assessment monitoring.

The June 12, 2006, document concluded that the statistically significant change for chloride at monitoring well MW-6a was due to *natural variation in ground water quality*, and not as a result of impact from the landfill. The September 11 and September 21, 2006, documents also concluded that the statistically significant change for acetone in monitoring well MW-6D is due to a source other than the landfill.

Ohio EPA has reviewed the applicable information and concurs with the demonstrations included in the September 11 and 21, 2006, documents. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring wells MW-6a and MW-6D.

The determination of the demonstration for chloride in monitoring well MW-16B will be addressed under separate cover.

Should future or existing ground water sampling results indicate statistically significant changes in ground water monitoring parameters, the owner or operator will be required to either enter into assessment monitoring in accordance with OAC Rule 3745-27-10(E) or obtain approval to remain in the detection monitoring program.

You are hereby notified that this action of the Director of Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals 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.

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An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions concerning this letter, please contact Laura Parkinson of Ohio EPA, CDO at (614)728-3889.

Sincerely,

Craig Butler  
Chief, Central District Office  
for Joseph P. Koncelik, Director

c: Duane Snyder, DSIWM-CDO  
Scott Hester, DSWIM-CO  
Jeff Gibbs, Franklin County Health Department