



State of Ohio Environmental Protection Agency

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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 December 5, 2006, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Central District Office (CDO), received a document titled "September 2006 Sampling Event" dated September 4, 2006, for the Franklin County Landfill (Facility) located in Franklin County. This document was submitted by Mr. Paul Flory, Esq., of the Solid Waste Authority of Central Ohio, and contains the ground water sampling results and the statistical analysis from the September 2006 ground water sampling event at the Facility. This document also contained a demonstration for monitoring well MW-6a and MW-16B.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: chloride in monitoring well MW-6a, chloride and sodium in MW-16B; chloride, ammonia and sodium in MW-17B; ammonia in MW-11r; sodium in MW-4a; alkalinity and sodium in MW-13B; ammonia in MW-6D; alkalinity in MW-16D; sodium in MW-17D; alkalinity and sodium in MW-13R; ammonia and sodium in MW-16R; and ammonia and sodium in MW-17R.

Verification sampling was performed on November 28, 2006. Analysis of the re-sampling data demonstrated that the statistically significant changes for sodium in MW-4a, alkalinity and sodium in MW-13B, ammonia and sodium in MW-17B, ammonia in MW-6D, alkalinity in MW-16D, sodium in MW-17D, alkalinity and sodium in MW-13R, ammonia and sodium in MW-16R, and ammonia and sodium in MW-17R were false positives. Therefore, monitoring wells MW-4a, MW-13B, MW-17B, MW-6D, MW-16D, MW-17D, MW-13R, MW-16R and MW-17R 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 changes for chloride in monitoring well MW-6a, chloride and sodium in MW-16B, chloride in MW-17B and ammonia in MW-11r.

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, 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 February 8, 2007, 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. This document also concluded that the significant changes in chloride and sodium in MW-16B were due to a source other than the landfill. The February 8, 2007, document also concluded that the statistically significant change for chloride in MW-17B and ammonia in MW-11r was due to a change in the statistical analysis method used.

Ohio EPA has reviewed the applicable information and concurs with the demonstrations included in the February 8, 2006, document. 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, MW-16B, MW-17B and MW-11r.

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. 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

Mr. Rick Dodge
Solid Waste Authority of Central Ohio
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Sincerely,

Craig Butler
Chief, Central District Office
For Chris Korleski, Director

cc: Duane Snyder, DSIWM-CDO
Scott Hester, DSWIM-CO
Jeff Gibbs, Franklin Co. Health Dept.