



State of Ohio Environmental Protection Agency

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August 14, 2007

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

**Re: Franklin County Landfill, Franklin County
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii)**

On June 15, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Central District Office (CDO), received a document titled, "Statistical Analysis of Detection Monitoring Results, 2007 First Semiannual Event" dated June 12, 2007, for the Franklin County Landfill (Facility) located in Franklin County. This document was submitted by Eagon and Associates, Inc., on behalf of the Facility, and contains the ground water sampling results and the statistical analysis from the April 2007 ground water sampling event at the Facility. This document also contains alternate source demonstrations for monitoring wells MW-6a, MW-16B, MW-17B, MW-13B, and MW-11m.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: ammonia in monitoring wells MW-2D, MW-13B, and MW-16R; chloride in MW-6a, MW-17B, and MW-11m; chloride and sodium in MW-16B; and barium in MW-13B.

Verification sampling was performed on May 9, 2007. Analysis of the re-sampling data demonstrated that the statistically significant changes for ammonia in MW-2D, MW-13B, and MW-16R were false positives. Therefore, monitoring wells MW-2D and MW-16R were automatically returned to the detection monitoring program pursuant to OAC Rule 3745-27-10(D)(7)(c)(i). However, the re-sampling data verified the statistically significant changes for chloride in MW-6a, MW-17B, and MW-11m; chloride and sodium in MW-16B; and barium in MW-13B.

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

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

continue detection monitoring within two hundred ten (210) days from the initial sampling, then 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, 2007, document concluded that the statistically significant changes for chloride in monitoring wells MW-6a, MW-17B, and MW-11m were due to natural variation in ground water quality, and not as a result of impact from the Facility. This document also concluded that the significant changes in sodium and chloride in MW-16B were due to a source other than the Facility. This document also concluded that the statistically significant change for barium in MW-13B was due to turbidity within this particular monitoring well.

Ohio EPA has reviewed the applicable information and concurs with the demonstrations included in the June 12, 2007, 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, MW-13B, and MW-11m.

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

Mr. Rick Dodge, Director of Compliance
Solid Waste Authority of Central Ohio
Page -3-

If you have any questions concerning this letter, please feel free to contact Phil Farnlacher of Ohio EPA, CDO at (614) 728-3890.

Sincerely,

Craig Butler
Chief
Central District Office
for Chris Korleski, Director

- c. Christopher Cobel, Eagon and Associates
Jeff Gibbs, Franklin County Health Dept.
Cal James, DDAGW/CDO
DSIWM/CDO File

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