



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center  
50 W. Town St., Suite 700  
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184  
www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

Mr. Edward Irelan, Manager of Operations  
Hoffman Road Landfill  
3962 Hoffman Road  
Toledo, Ohio 43611

**Re: City of Toledo Hoffman Road Landfill, Lucas County, Ohio  
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Irelan:

On July 11, 2008, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO), received a document titled "*Statistical Report of Groundwater Quality for the City of Toledo Hoffman Road Landfill*," dated July 10, 2008, for the City of Toledo's Hoffman Road Landfill (Facility), located in Lucas County. This document was submitted by Hull & Associates, Inc. on behalf of the City of Toledo and included a request to continue detection monitoring at specific wells at the Facility despite statistically significant increases in the data collected for those wells during the April 2008 ground water sampling event at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant change was detected: ammonia at monitoring well MW-3.

Verification sampling was performed on June 23 and July 2, 2008. The re-sampling data confirmed the statistically significant change for ammonia at monitoring well MW-3.

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 July 10, 2008 document concluded that the statistically significant change for ammonia at monitoring well MW-3 was due to an error in sampling or analysis and not as a result of impact from the landfill. Monitoring well MW-3 was initially sampled on April 29, 2008.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the July 10, 2008 document. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or

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

operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring well MW-3.

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 Kimberly Burnham of Ohio EPA, NWDO at 419-373-3049.

Sincerely,

Shannon Nabors, Chief  
Northwest District Office  
for Chris Korleski, Director

pc: Jodi Vaughan, Toledo-Lucas County Health Department  
Karen Okonta, Hull & Associates, Inc.  
Mike Beal, DDAGW, NWDO  
Jack Leow, DDAGW, NWDO  
Kimberly Burnham, DSIWM, NWDO