



State of Ohio Environmental Protection Agency

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Paul Flory
Solid Waste Authority of Central Ohio
4239 London Groveport Road
Grove City, OH 43123-9518

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

Dear Mr. Flory:

On June 6, 2008, 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 2008 First Semiannual Event", dated June 4, 2008, for the Franklin County Landfill (Facility) located in Franklin County. This document contains the results of the ground water sampling and statistical analysis from the spring ground water sampling event that was conducted on March 25 and 26, 2008 and re-sampling on May 13, 2008.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: alkalinity in MW-17D, chloride in MW-6a and MW-11m.

Verification sampling was performed on May 13, 2008. Analysis of the re-sampling data demonstrated that the statistically significant change for alkalinity in MW-17D was a false positive. Therefore, monitoring well MW-17D was automatically returned to the detection monitoring program pursuant to OAC Rule 3745-27-10(D)(7)(c)(i). Ohio EPA acknowledges the return of this well to the detection monitoring program. However, the re-sampling data verified the statistically significant changes for chloride in MW-6a and MW-11m.

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 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 monitoring within two hundred ten (210) days from the 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 report you submitted demonstrates that the chloride in monitoring wells MW-6a and MW-11m were due to natural variation in ground water quality, and not the result of impact from the landfill.

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

Ohio EPA has reviewed the applicable information and concurs with the demonstration in the June 2008 report. 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-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 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 authorization, please contact Allan Hurtt of Ohio EPA's Central District Office at (614) 728-3889.

Sincerely,

Isaac Robinson III, Chief
Central District Office
for Chris Korleski, Director

2. cc: Jeff Gibbs, Franklin County Health Department
Christopher J. Cobel, Eagon & Associates
Scott Hester, DSIWM, CO
Duane Snyder, DSIWM, CDO