



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. Paul Flory:

On December 4, 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 Second Semiannual Event", dated December 2, 2008, for the Franklin County Sanitary 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 September 23-25, 2008, second semiannual 2008 ground water sampling event and the October 31, 2008, ground water re-sampling event at the Facility.

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

Verification sampling was performed on October 31, 2008. Analysis of the re-sampling data demonstrated that the statistically significant changes for chloride in monitoring well MW-6a and barium in monitoring well MW-13R were false positives. Therefore, monitoring wells MW-6a and MW-13R 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 alkalinity in monitoring well MW-2B, chloride in monitoring wells MW-11m and MW-17B.

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 December 2, 2008, document concluded that the statistically significant change for alkalinity at monitoring well MW-2b was due to a laboratory error and not as a result of impact from the landfill.

This document also concluded a statistically significant change in chloride at monitoring wells MW-17B and MW-11m due to natural variations in the ground water and not as a result of impact from the landfill.

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

Monitoring well MW-2b was initially sampled on September 23, 2008, monitoring well MW-17B was initially sampled on September 24, 2008 and monitoring well MW-11m was initially sampled on September 25, 2008.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the December 2, 2008, 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-2b, MW-17B 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

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

Sincerely,

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

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