



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

MAR 09 2011

Mr. Alvie Green  
Noble Road Landfill  
170 Noble Road East  
Shiloh, Ohio 44878

**Re: Noble Road Landfill, Richland County  
Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g)  
Response to Request**

Dear Mr. Green:

On November 3, 2010, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received a document titled "*Statistical Background Period Evaluation and OAC 3745-27-10(C)(7)(g) Demonstration*", dated October 29, 2010, for Noble Road Landfill (Facility) in Richland County. This document was submitted by Eagon & Associates, Inc. on behalf of Rumpke of Northern Ohio, Inc. The submittal contained a request to add previously-determined statistically significant increases to the background database. The constituents and monitoring wells associated with the request include: ammonia in BW-15 on 05/12/09, chloride in BW-15 on 05/01/07 and 11/05/07, and ammonia in MW-1 on 11/04/08 and 05/12/09. All other wells and parameters contained in the request will be addressed in a separate letter.

Pursuant to Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g), background data can only be added in blocks of data resulting from the analysis of four or more statistically independent samples after the data have been statistically compared to current background data and no statistical differences are detected, unless another method is deemed acceptable by the director.

As you know, Ohio EPA approved the addition of data for several parameters to the background database in seven monitoring wells in a letter dated February 22, 2011. Ohio EPA has reviewed the request to update the background database for ammonia in monitoring wells BW-15 and MW-1 and chloride in monitoring well BW-15, and has determined that the Facility has not adequately demonstrated that the data presented are representative of natural variability in ground water quality. Therefore, I do not deem acceptable the request, pursuant to OAC Rule 3745-27-10(C)(7)(g), to update the

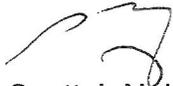
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background database for ammonia in BW-15 on 05/12/09, chloride in BW-15 on 05/01/07 and 11/05/07, and ammonia in MW-1 on 11/04/08 and 05/12/09.

A detailed account of Ohio EPA's review of the ground water request will be sent to you in separate correspondence.

If you have any questions concerning this letter, please contact Tyler Madeker of Ohio EPA, NWDO at (419) 373-3078.

Sincerely,



Scott J. Nally, Director

pc: Thomas Jenkins, Eagon & Associates, Inc.  
Jay Roberts, Rumpke  
Dave Murphy, Rumpke  
Andrea Barnes, Richland County Health Department  
Jack Leow, DDAGW-NWDO,  
Randy Skrzyniecki, DDAGW-NWDO  
Mike Reiser, DSIWM-NWDO  
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