



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Craig W. Butler, Director

OHIO E.P.A.

JUN 23 2014

ENTERED DIRECTOR'S JOURNAL

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: [Signature] Date: 6-23-14

**JUN 23 2014**

**Re: Lorain County Landfill LLC  
 Director's Authorization  
 Approval  
 Municipal Solid Waste Landfill  
 Lorain County  
 MSWL018801**

Mr. Chris Jaquet  
 BFI-Lorain County II Landfill  
 43502 Oberlin-Elyria Rd.  
 Oberlin, Ohio 44074

**Subject: Lorain II Landfill, Lorain County  
 Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Jaquet:

On March 19, 2014, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO), received a document titled "OAC Rule 3745-27-10(D)(7)(a)[sic](ii) Alternate Source Demonstration for Barium, Nickel, Potassium and Vanadium at Well MW-1, Barium at MW-2, Sodium at Well MW-203, and Sodium and Chloride at Well MW-211S, Lorain County II Landfill, 2013 Second Semiannual Event, Lorain County, Ohio," for the Lorain II Landfill (Facility) located in Lorain County. This document was submitted by Eagon & Associates, Inc. on behalf of the Facility and contains the ground water sampling results and the statistical analysis from the November 18-19, 2013 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: barium, nickel, potassium and vanadium at well MW-1; barium at MW-2, sodium at MW-203, and sodium and chloride MW-211S.

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 March 19, 2014 document concluded that the statistically significant changes for barium, nickel, potassium, and vanadium in ground water samples at well MW-1 were due to a source other than the landfill, namely, the well has integrity issues and appears to have reached the limit of its age/life expectancy for a monitoring well. The verified statistically significant difference for barium in ground water samples at well MW-2 is due to natural variation and is not indicative of a waste derived impact to ground water. The statistically significant differences for sodium and chloride in ground water

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samples at well MW-211S were due to a source other than the landfill, namely the application of road salt on the adjacent roadway. The verified statistically significant difference for sodium in ground water samples at well MW-203 is due to natural variation and is not indicative of a waste derived impact to ground water.

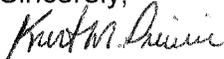
Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the March 19, 2014 document. Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c)(ii), the owner or operator is hereby authorized to continue the detection monitoring program at the Facility for monitoring wells MW-1, MW-2, MW-203, and MW-211S.

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 Environmental Protection (Director) is final and may be appealed to the Environmental Review Appeals Commission pursuant to Ohio Revised Code Section 3745.04. 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 made payable to "Treasurer, State of Ohio." The Commission, in its discretion, may reduce the fee if by affidavit it is demonstrated 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  
77 South High St., 17<sup>th</sup> Floor  
Columbus, Ohio 43215

If you have any questions concerning this letter, please contact Clarissa Gereby, Ohio EPA, NEDO at (330) 963-1224.

Sincerely,  


Kurt M. Princic  
Chief, Northeast District Office  
for Craig W. Butler  
Director, Ohio EPA

cc: John Sabo, Lorain County Health Department  
Jarnal Singh, DMWM, NEDO