



State of Ohio Environmental Protection Agency

Northwest District Office

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APR 24 2002 Bob Taft, Governor
Christopher Jones, Director

ENTERED DIRECTOR'S JOURNAL

APR 24 2002

Huron County Commissioners
180 Milan Avenue
Norwalk, Ohio 45857

Re: Huron County Landfill, Huron County
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c) authorization

Dear Commissioners:

On February 23, 2001, Malcolm Pirnie, Inc. submitted to the Ohio Environmental Protection Agency (Ohio EPA) a request, pursuant to OAC Rule 3745-27-10(D)(7)(c), documenting that detections of toluene at MW-2, MW-5, MW-10, MW-13 and MW-14 during the November 7-8, 2001, sampling event were not the result of impact from the Huron County Landfill.

Therefore, pursuant to OAC Rule 3745-27-10(D)(7)(c), I hereby approve this demonstration and the owner/operator of the Huron County Landfill may continue detection monitoring at monitoring well MW-2, MW-5, MW-13, and MW-14.

MW-10 is currently in the ground water quality assessment program and; therefore, the stipulations of OAC Rule 3745-27-10(D)(7)(c) do not currently apply to MW-10.

See the attached Appendix for a detailed account of Ohio EPA's review of these events.

Should future or existing ground water sampling results indicate statistically significant increases in ground water quality for other parameters, the facility owner/operator will be required to enter into assessment monitoring in accordance with OAC Rule 3745-27-10(E), or obtain similar approval to remain in detection monitoring.

You are hereby notified that this action of the 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 ground upon which the appeal is based. The appeal shall be filed with the Commission within 30 days after notice of the action. Notice of the filing of the appeal shall be filed with the director of environmental protection within three (3) days after the appeal is filed with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

I certify this to be a true and correct copy of the original as shown to me by the Environmental Protection Agency

APR 24 2002

If you have any questions concerning this document, you may contact the Ohio Environmental Protection Agency-Northwest District Office at (419) 352-8461.

Sincerely,



Edwin J. Hammett, District Chief
for Christopher Jones, Director

/llr

pc: Mr. Jack Jump, Huron County Health Department
Mr. Peter Welch, Huron County Landfill Manager
Mr. Wes Rhiel, Malcolm Pirnie, Inc.
Mr. Jack Leow, DDAGW-NWDO
Ms. May Ann Miller, DSIWM-NWDO
Mr. Scott Hester, DSIWM, CO ✓

Appendix

COMMENTS AND CONCLUSIONS

1. During the November 7-8, 2001, sampling event, toluene was detected at MW-2, MW-5, MW-10, MW-13 and MW-14. During this event, the toluene concentrations at these wells ranged between 2.7 $\mu\text{g/L}$ at MW-10 to 23 $\mu\text{g/L}$ at MW-13. All of these wells are screened in the uppermost bedrock aquifer system. Monitoring well MW-5 is an upgradient monitoring well and the remaining four wells are downgradient or side gradient of the landfill. Further, MW-10 is currently in the ground water quality assessment monitoring program for statistically significant increases of barium and chloride.

To confirm or refute these elevated toluene concentrations, these wells were resampled on December 21, 2001. Toluene was again detected at all of these wells during the December 21, 2001, resampling event at concentrations ranging between 2.4 $\mu\text{g/L}$ at MW-5 to 34 $\mu\text{g/L}$ at MW-2. However, toluene was also detected in the field blank at a concentration of 2.4 $\mu\text{g/L}$. This detection of toluene in the field blank indicated that the toluene detections in the ground water samples may have been at least somewhat attributable to field contamination.

To further investigate this issue, a second resampling event was performed for these wells on February 14-15, 2002. For this sampling event, samples from each well were split and were sent to two separate laboratories for analysis. The results of this resampling event indicate that toluene was detected in the duplicate sample for MW-10 (currently in assessment) from one of the laboratories. For the remaining four detection monitoring wells, toluene was not detected by either laboratory. However, both laboratories detected toluene in the field blank from this resampling event at concentrations of 3.1 $\mu\text{g/L}$ and 3.4 $\mu\text{g/L}$.

To further evaluate the toluene detections in the field blank samples from the December 21, 2001, and February 14-15, 2002, sampling events, Malcolm Pirnie performed a supplemental blank test. For this test, five separate blank samples were collected. These samples included two samples using the distilled water typically used by the sampling crew, a City of Columbus tap water blank, a tap water blank poured through a disposable bailer and a trip blank from the laboratory. The results of this blank test indicated that toluene was detected in the two samples of distilled water typically used by the sampling crew at concentrations of 1.3 $\mu\text{g/L}$ and 2.9 $\mu\text{g/L}$. However, toluene was not detected in the tap water samples or in the trip blank.

In conclusion, the submittal states **“Since toluene was not confirmed in the February 2002, sampling event in groundwater samples analyzed from monitoring wells MW-2, MW-5, MW-10, MW-13 and MW-14, we believe that the November 2001, semi-annual sampling results were a false indication of contamination at the Huron County Landfill. Toluene detected in field blank samples appears to be the result of the use of deionized water supplied by . . . [water supplier].”** Ohio EPA concurs.

2. The submittal included MW-10 in the list of wells for this demonstration in accordance with Ohio Administrative Code (OAC) Rule 3745-27-1. However, MW-10 is currently in the ground water quality assessment program and; therefore, the stipulations of OAC Rule 3745-27-10(D)(7)(c) do not apply to MW-10.