



State of Ohio Environmental Protection Agency

OHIO E.P.A.

Northwest District Office

347 North Dunbridge Road
Bowling Green, OH 43402-9998
June 28 2002

TELE: (419) 352-8461 FAX: (419) 352-8468

Bob Taft, Governor
Christopher Jones, Director

ENTERED DIRECTOR'S JOURNAL

JUN 28 2002

Mr. Wilhelm Forster
15735 County Road E
Continental, Ohio 45831

Re: Miller City Landfill Ground Water Demonstration

Dear Mr. Forster:

On October 25, 2001, a ground water sampling event was conducted at the Miller City Landfill. The analytical result for chloride was 31 mg/L. This value was a statistically significant increase as determined by the Ohio Environmental Protection Agency (Ohio EPA). This served as notification to the director that the following statistically significant increases occurred:

- Chloride at monitoring well MW-6.

A May 1, 2002, letter represented the owner/operator's demonstration in accordance with Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c) that the landfill was not impacting the ground water for chloride at MW-6. Ohio EPA concurs with the May 1, 2002, demonstration and pursuant to OAC Rule 3745-27-10(D)(7)(c), the owner/operator of the Miller City Landfill may continue ground water detection monitoring at the landfill for MW-6.

Should future or existing ground water sampling results indicate statistically significant changes in ground water quality for this or other detection monitoring 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.

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

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.

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

By Dmytro Koval Date 6/28/02

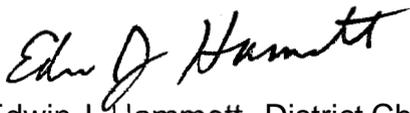
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An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

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

Sincerely,



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

pc: Bill Edwards, Putnam County Health Department
Beth Brown, Eagon & Associates
Randy Skrzyniecki, DDAGW-NWDO
Mike Reiser, DSIWM-NWDO

Attachment

EJH/llr

APPENDIX

Comment No. 1 details Ohio EPA comments regarding chloride levels at MW-6.

1. On October 25, 2001, monitoring well MW-6 was purged and sampled as part of the annual sampling event. The analytical result for chloride was 31 mg/L. This value was a statistically significant increase as determined by Ohio EPA using parametric prediction interval analysis for both interwell and intrawell methods. The well was subsequently re-sampled on April 25, 2002.

On May 1, 2002, the owner/operator provided a demonstration for well MW-6. The May 1, 2002, document presents the re-sampling information and other supporting documents which the owner/operator believes support their contention that, in accordance with OAC Rule 3745-27-10 (D)(7)(c), "a source other than the sanitary landfill caused the contamination or that the statistically significant increase resulted from error in the sampling, analysis, statistical evaluation, or natural variation in ground water quality." The chloride value for the re-sampling event was 15 mg/L.

The May 1, 2002, submittal states in part, "**As shown on the laboratory report, the verification re-analyses did not confirm the October 2001 values.**" This statement is true and the analytical results supplied by the owner/operator support this statement. Given this, the rationale noted in bold above **does** support a demonstration for chloride at well MW-6.

Considering the rationale detailed in the statement above, Ohio EPA believes that the owner/operator has adequately demonstrated in accordance with OAC 3745-27-10 (D)(7)(c), that a source other than the landfill caused the Contamination or that the statistically significant increase resulted from error in the sampling, analysis, statistical evaluation, or natural variation in ground water quality relative to chloride in monitoring well MW-6 during the October 25, 2001, annual sampling event.