



State of Ohio Environmental Protection Agency

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JAN 29 2003

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ENTERED DIRECTOR'S JOURNAL

Mr. James D. Martin, Director
Lorain County Metropolitan Park District
12882 Diagonal Road
LaGrange, Ohio 44050

**Re: Ford Road Landfill, Lorain County
Explosive Gas Monitoring Plan Approval**

Dear Mr. Martin:

On February 1, 1989, the Ohio Environmental Protection Agency (Ohio EPA) received two documents titled *Explosive Gas Monitoring System Design for the Old Ford Road Landfill Site, City of Elyria, Lorain County, Ohio*, and *Explosive Gas Monitoring, Sampling, and Reporting Procedures for Old Ford Road Landfill, Elyria, Lorain County, Ohio* (Plan). Both documents were prepared by Bowser Morner Associates, Inc., on behalf of Browning-Ferris Industries of Ohio, Inc. (BFIO). The Ford Road Landfill, also known as the Brotherton Disposal Landfill, is a closed solid waste disposal facility located immediately east of Ford Road, and one and one half miles north of the West River Road and Ford Road intersection, near Elyria, Lorain County. The landfill is owned by Lorain County Metropolitan Park District (LCMPD) and was last operated by BFIO. The landfill is approximately 6.3 acres and is centrally located in a 15.7-acre site. The landfill began operations in approximately 1900 and closed in 1974.

The Plan was submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-27-12, effective June 12, 1989. This rule required the owner or operator of a closed landfill to submit an explosive gas monitoring plan to the director for approval.

Ohio EPA has reviewed the plan and found it to be in compliance with OAC Rule 3745-27-12, as effective June 12, 1989. The rule citations in the conditions below, except condition 1, refer to OAC Rule 3745-27-12, as effective June 12, 1989. Condition 1 refers to OAC Rule 3745-27-12, as effective June 1, 1994, because the new explosive gas threshold limits apply to all facilities subject to the rule. Ohio EPA approves the plan for the closed Ford Road Landfill with the following conditions:

Conditions

1. Pursuant to OAC Rule 3745-27-12(A)(6), effective June 1, 1994, the explosive gas threshold limit for each permanent and temporary monitor is either:
 - a. 100 percent of the lower explosive limit at the facility boundary, or

Bob Taft, Governor
Maureen O'Connor, Lieutenant Governor
Christopher Jones, Director

I received the documents from the City of Elyria on 1/29/89 and a copy of the documents was sent to the Director of the Ohio EPA on 1/29/89.

- b. 25 percent of the lower explosive limit in structures within the facility boundary.
2. The owner or operator of the Ford Road Landfill, upon the detection of explosive gas which equals or exceeds the explosive gas threshold limit in condition No. 1, shall:
 - a. Take all necessary steps to ensure protection of human health and the environment.
 - b. Immediately notify Ohio EPA Northeast District Office and the City of Elyria Health Department.
 - c. Within 60 days of detection, submit to the director a copy of the remediation plan and implement the remediation plan.
3. Pursuant to OAC Rule 3745-27-12(N), effective June 12, 1989, the Lorain County Metropolitan Park District shall, within 270 days from the date of this approval, submit four complete, revised copies of the explosive gas monitoring plan. Revisions to the plan shall include, but are not limited to, the following:
 - a. Identification of all on-site and off-site structures and occupied structures within 1,000 feet of the limits of waste placement, pursuant to OAC Rule 3745-27-12(D)(2)(b)(iv). Unless there have been no changes regarding on-site and off-site structures, Figure 2, "Site Location Detail Map," should be updated accordingly in both documents, *Explosive Gas Monitoring System Design for the Old Ford Road Landfill Site*, and *Explosive Gas Monitoring, Sampling, and Reporting Procedures for Old Ford Road Landfill*.
 - b. Identification of all other potential sources of explosive gas within 1,000 feet of the limits of waste placement, pursuant to OAC, Rule 3745-27-12(D)(2)(b)(vi). Such sources shall include, but shall not be limited to, historical solid waste and construction/demolition debris disposal sites. Unless there have been no changes regarding potential sources of explosive gas, Figure 2, "Site Location Detail Map," should be updated accordingly in both documents.
 - c. Legal description of landfill property pursuant to OAC Rule 3745-27-12(D)(2)(c).
 - d. Geologic cross sections for those areas of the perimeter of the landfill property which have verified occupied structures within one thousand feet of the horizontal limits of waste placement, pursuant to OAC Rule 3745-27-12(D)(2)(e)(vi).

- e. Discussion of historical operations of the landfill and identification of all regulatory authorizations granted to this site, pursuant to OAC Rule 3745-27-12(D)(3)(c). Authorizations shall include, but are not limited to, findings and orders issued by Ohio EPA or the City of Elyria Health Department, plan approvals through Ohio EPA, Ohio Department of Health, or the City of Elyria Health Department, authorizations granted pursuant to OAC Rule 3745-27-13, and any air emission or water discharge permits issued by Ohio EPA.
 - f. Description of all previous explosive gas monitoring, including punch bar stations, pursuant to OAC Rule 3745-27-12(D)(3)(g).
 - g. Review and summary of all historical records pertaining to explosive gas investigations, inspections, or complaints pursuant to OAC Rule 3745-27-12(D)(4)(a)*
 - h. A copy of the revised completed application form as prescribed by the director, pursuant to OAC Rule 3745-27-12(F)(I).
 - i. A procedure for abandonment of monitoring wells, pursuant to OAC Rule 3745-27-12(F)(6). The procedure should be updated to conform with abandonment procedures in the State of Ohio Technical Guidance for Unused Wells, dated 1996, by the State Coordinating Committee on Ground Water. The owner/operator shall make their best effort to remove well casings during well abandonments.
 - j. Appendices of the plan, revised to include the following:
 - i. Revised equipment manuals, if equipment used in monitoring has been replaced.
 - ii. A revised reporting form meeting the requirements of OAC Rules 3745-27-12(F)(7)(c) and 3745-27-12(I)(3). Revised forms shall include ambient air temperature and relative humidity.
 - iii. Geologic boring logs required pursuant to OAC Rules 3745-27-12(F)(7)(e) and 3745-27-12(D)(2)(e)(vi).
4. Within 90 days of a notice of deficiency of the revised plan submitted pursuant to Condition No. 3 above, Lorain County Metropolitan Park District shall submit all revisions of the explosive gas monitoring plan requested by Ohio EPA.

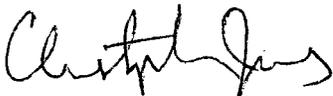
5. Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state solid waste laws or regulations. Furthermore, this authorization shall not be interpreted to release LCMPD or others from responsibility under ORC Chapters 3704, 3714, 3734, or 6111; under the Federal Clean Water Act, the Resource Conservation and Recovery Act, the Toxic Substances Control Act, or the Comprehensive Environmental Response, Compensation, and Liability Act; or from other applicable requirements for remedying conditions resulting from any release of contaminants from the facility to the environment.

You are hereby notified that this action of the Director of Environmental Protection is final and may be appealed to the Environmental Review Appeals Commission (Commission) pursuant to ORC Section 3745.04. The appeal must be made in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Commission within 30 days after notice of the director's action. A copy of the appeal must be served on the director within three days of filing with the Commission. An appeal may be filed with the 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 authorization, please contact Dave Dysle of Ohio EPA's Northeast District Office at (330) 963-1286.

Sincerely,



Christopher Jones
Director

CJ/DD/cl

cc: Murat Tukel and Judy Bowman, DSIWM-NEDO
Vanessa Steigerwald, DERR-NEDO
Scott Hester, DSIWM-CO
David Oakes, Elyria City Health Department
Patricia McCaslin, Lorain County Metropolitan Park District
Steve Doss, Allied Waste Industries, Inc.
David Matthews, Allied Waste Industries, Inc.
Matthew Ohl, Region 5