



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43216-1049

Mr. Rick Dodge  
SWACO  
6220 Young Road  
Grove City, Ohio 43123

**RE: FRANKLIN COUNTY; FRANKLIN COUNTY LANDFILL,  
OAC 3745-27-10(E)(9)(b)**

Dear Mr. Dodge:

During September 2004, a ground water sampling event was conducted at the Franklin County Landfill. The results of that sampling were submitted to this agency on December 10, 2004 along with a notification of statistically significant change for Methylene chloride and ethylbenzene in well MW-9r and carbon disulfide in MW-11a. In addition, the following wells had statistically elevated chloride concentrations, MW-6a, MW-4b, MW-1D, MW-8, and MW-11m. Ammonia was also statistically elevated in MW-11r.

OAC 3745-27-10(D)(7)(c) requires facilities who have identified statistically significant increases in ground water monitoring parameters to receive approval from the Director in order to remain in detection monitoring. If a facility does not receive approval within 210 days of ground water sampling, the facility is required to initiate their assessment monitoring program.

On March 11, 2004, resampling results were received from the Solid Waste Authority of Central Ohio for the aforementioned wells. The resampling results were non-detect for Methylene chloride and ethylbenzene in MW-9r, carbon disulfide in MW-11a and ammonia in MW-11r. As such, these wells were allowed to remain in detection monitoring. Monitoring wells MW-6a, MW-4b, MW-1D, MW-8 and MW-11m were still statistically significant for chloride and therefore you submitted a demonstration to be allowed to return to detection monitoring.

However, since the time limits in accordance with OAC Rule 3745-27-10(D)(7)(c) were exceeded, Ohio EPA has reviewed this request pursuant to OAC Rule 3745-27-10(E)(9)(b) which allows the facility to show that the statistically significant change resulted from an error in sampling, analysis, statistical evaluation, or natural variation in ground water.

Bob Taft, Governor  
Jennette Bradley, Lieutenant Governor  
Joseph P. Koncelik, Director

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SWACO  
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The March 11, 2005 report concludes that the statistically significant increase of chloride in monitoring wells MW-6a, MW-4b, MW-1D, MW-8, and MW-11m was most likely due to either a change in laboratories or from natural variation in ground water quality.

Ohio EPA has reviewed the report, and we concur with the above conclusion. Therefore, pursuant to OAC rule 3745-27-10(E)(9)(b), I hereby approve keeping monitoring wells MW-6a, MW-4b, MW-1D, MW-8, and MW-11m in the detection monitoring program for chloride at the Franklin County Sanitary Landfill.

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 the assessment monitoring program in accordance with OAC Rule 3745-27-10(E) or obtain approval to remain in detection monitoring in accordance with OAC Rule 3745-27-10(D)(7)(c).

A detailed account of Ohio EPA's review of the request to remain in detection monitoring will be sent to you under separate cover.

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 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. It must be filed with the Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director within three (3) days of filing with the Commission.

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

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you should have any questions or comments on the above, feel free to contact Laura Parkinson in the Central District Office at (614) 728-3889.

Sincerely,

Craig Butler, Chief, Central District Office  
for Joe Koncelik, Director  
Ohio Environmental Protection Agency

cc: Jeff Grose, Franklin County Health Department  
DSIWM/CDO  
DDAGW/CDO