



State of Ohio Environmental Protection Agency

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

**RE:FRANKLIN COUNTY; FRANKLIN COUNTY LANDFILL, Ohio Administrative Code
OAC 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Dodge:

In December 2005, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Central District Office (CDO), received a document titled "Statistical Analysis of Ground Water Quality Data September 2005 Sampling Event", for the Franklin County Landfill.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: chloride in MW-16B, sodium in MW-4, alkalinity in MW-2b and sodium in MW-2b.

Verification resampling was performed and a demonstration was submitted to this office on February 22, 2006. Based on the resampling monitoring well MW-2b for alkalinity was automatically returned to detection monitoring program pursuant to OAC Rule 3745-27-10(D)(7)(c)(i). Ohio EPA acknowledges the return of this well to detection monitoring for alkalinity. However, the resampling data verified the statistically significant changes for chloride in MW-16B, sodium in MW-4 and sodium in MW-2b.

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 February 22, 2006 document concluded that the statistically significant changes for sodium in MW-4 and MW-2b are due to natural ground water variability at the site. Chloride in MW-16B was concluded to be a source other than the landfill affecting the well.

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

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Ohio EPA has reviewed the applicable information and concurs with the demonstration for MW-4 and MW-2b. 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 MW-4 and MW-2b.

At this time, Ohio EPA does not concur with the demonstration for chloride in MW-16B. Further information is needed to satisfy the requirements of OAC Rule 3745-27-10(D)(7)(c) regarding the statistically significant change for chloride in MW-16B.

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 Ohio EPA (Director) is final and may be appealed to the Environmental Review Appeals Commission (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. 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 after 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, Ohio 43215

If you have any questions concerning this letter, please contact Laura Parkinson of Ohio EPA, CDO at (614)728-3889.

Sincerely,

Craig Butler, Chief
Central District Office
for Joseph P. Koncelik, Director
Ohio Environmental Protection Agency

pc: Jeff Grose, Franklin County Health Department
Duane Snyder, DSIWM/CDO
Scott Hester, DSIWM/CO
Cal James, DDAGW/CDO