



State of Ohio Environmental Protection Agency

STREET ADDRESS:

MAILING ADDRESS:

Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

P.O. Box 1049
Columbus, Ohio 43216-1049

Mr. Mo Finy, District Engineer
Suburban North RDF
3415 Twp. Rd. 447
Glenford, Ohio 43739

**Re: Suburban North RDF, Licking County
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Finy:

On June 28, 2006, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Central District Office (CDO), received a document titled "2006 First Semiannual Ground-Water Results" dated June 22, 2006, for the Suburban North RDF (Facility) located in Licking County. This document was submitted by Mr. Mo Finy, District Engineer, and contains the ground water sampling results and the statistical analysis from the April 2006 ground water sampling event at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant changes were detected: ammonia in monitoring well MW-1C; chloride in monitoring wells MW-1C and MW-2A; sodium in monitoring well MW-3A; and barium in monitoring well MW-5CR.

Verification sampling was performed on May 31, 2006. Analysis of the re-sampling data demonstrated that the statistically significant change for ammonia in monitoring well MW-1C was a false positive. However, the re-sampling data verified the statistically significant change for chloride in monitoring well MW-1C and MW-2A; sodium in monitoring well MW-3A and barium in monitoring well MW-5CR.

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 June 22, 2006, document concluded that the statistically significant changes for chloride at monitoring wells MW-1C and MW-2A; sodium in monitoring well MW-3A; and barium in monitoring well MW-5CR, were due to *natural variation in ground water quality*, and not as a

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

result of impact from the landfill. Monitoring wells MW-1C, MW-2A, MW-3A and MW-5CR were initially sampled on April 19, 2006.

Ohio EPA has reviewed the applicable information and concurs with the demonstration included in the June 22, 2006, document. 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 monitoring wells MW-1C, MW-2A, MW-3A and MW-5CR.

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 pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals 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

c: Duane Snyder, DSIWM-CDO
Scott Hester, DSWIM-CO
Richele Piper, Licking Co. Health Dept.