



State of Ohio Environmental Protection Agency

Northwest District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

September 7, 2007

Putnam County Commissioners
245 East Main Street, Suite 101
Ottawa, Ohio 45875

**Re: Putnam County Landfill, Putnam County
Ohio Administrative Code (OAC) Rule 3745-27-10(E)(9)(a) and
Rule 3745-27-10(E)(9)(b) Approvals**

Dear Commissioners:

On May 25, 2007, and July 18, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received documents titled "*March 2007 Ground Water Quality Data Report*," (dated May 24, 2007) and "*Response to Ohio EPA Comments Dated January 26, 2007*," (dated July 16, 2007), respectively, for the Putnam County Landfill (Facility) located in Putnam County. These documents were submitted by Eagon & Associates, Inc. on behalf of the Putnam County Commissioners, pursuant to OAC Rule 3745-27-10(E)(9)(b), and requested reinstatement of the ground water detection monitoring program for specific monitoring wells at the Facility and to release the owner or operator from the obligation to comply with the ground water quality assessment monitoring program implemented due to the detection of statistically significant changes for sodium and potassium in monitoring well MW-1 during the September 25 – 27, 2006, ground water sampling event at the Facility.

Also, on January 29, 2007, Ohio EPA, DSIWM, NWDO received a document titled "*Request for Reinstatement of Detection Monitoring for MW-9RR at the Putnam County Landfill*," dated January 24, 2007, for the Facility. This document was submitted by Eagon & Associates, Inc. on behalf of the Putnam County Commissioners, pursuant to OAC Rule 3745-27-10(E)(9)(a), and requested reinstatement of the ground water detection monitoring program for specific monitoring wells at the Facility and to release the owner or operator from the obligation to comply with the ground water quality assessment monitoring program implemented due to the detection of statistically significant changes for sodium in MW-9RR.

Pursuant to OAC Rule 3745-27-10(E)(9)(b), 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 from natural variation in ground water quality and request that the director approve reinstatement of the detection monitoring program.

Further, pursuant to OAC Rule 3745-27-10(E)(9)(a), the owner or operator may determine that the concentrations of ***all waste-derived constituents*** at all of the monitoring wells in a ground water quality assessment monitoring program, and at any additional wells that may have been installed as part of this assessment monitoring program, are shown to be at or below background values for two consecutive sampling events and may request that the director approve reinstatement of the ground water detection monitoring program for these monitoring wells and release the owner or operator from the obligation to comply with the ground water quality assessment monitoring program requirements at the Facility.

The July 18, 2007, document concluded that the statistically significant changes for sodium and potassium in monitoring well MW-1 were due to an error in the statistical analysis of the data, and not as a result of impact from the landfill. Ohio EPA has reviewed the applicable information pursuant to OAC Rule 3745-27-10(E)(9)(b), and concurs with this conclusion. Also, based on the information contained in the January 24, 2007, document, the results of two consecutive sampling events, conducted March 6, 2006 and September 26, 2006, indicated that the concentrations of all waste-derived constituents, including sodium, were at or below background values. Ohio EPA has reviewed the applicable information and concurs with this conclusion.

Therefore, pursuant to OAC Rule 3745-27-10(E)(9)(a) and OAC Rule 3745-27-10(E)(9)(b), I hereby approve reinstatement of the ground water detection monitoring program for the monitoring wells in the ground water quality assessment monitoring program, noted above, and release the owner or operator from the obligation to comply with this assessment monitoring program at the Facility. This approval of reinstatement of the detection monitoring program applies to monitoring wells MW-1 and MW-9RR.

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

This approval shall not be construed to release the owner or operator from the obligation to comply with the requirements of any other ground water quality assessment monitoring program being conducted at the Facility.

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 Kimberly Burnham of Ohio EPA, NWDO at (419) 373-3049.

Sincerely,

Shannon Nabors, Chief
Northwest District Office
for Chris Korleski, Director

pc: Scott Hester, DSIWM, CO
Ken Brock, DDAGW, NWDO
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