



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

May 2, 2008

Mr. Edward Irelan, Manager of Operations  
Hoffman Road Landfill  
3962 Hoffman Road  
Toledo, Ohio 43611

**Re: City of Toledo Hoffman Road Landfill, Lucas County, Ohio  
Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(g) Approval**

Dear Mr. Irelan:

On March 17, 2008, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received a document titled *“Request to Update Statistical Background for Ammonia in Monitoring Wells MW-16 and MW-11 at the City of Toledo Hoffman Road Landfill,”* dated March 13, 2008, for the City of Toledo’s Hoffman Road Landfill (Facility), located in Lucas County. This document was submitted by Hull & Associates, Inc. on behalf of the City of Toledo and included a request to update the background data group representing the background ground water quality for ammonia at monitoring wells MW-16 and MW-11. The requested update includes the deletion of earlier data and the incorporation of new data, even though there are statistically significant increases in the data proposed for incorporation. Concurrent with the request to update the background data group, the City of Toledo submitted an alternate source demonstration in accordance with Ohio Administrative Code (OAC) Rule 3745-27-10(E)(9)(b), that concluded that the increases in ammonia concentrations at monitoring wells MW-16 and MW-11 are due to a shift in background concentration as a result of natural variability in ground water quality. This demonstration is addressed in a separate correspondence from Ohio EPA.

Pursuant to OAC Rule 3745-27-10(C)(7)(g), background data can only be added in blocks of data resulting from the analysis of four or more statistically independent samples after the data have been statistically compared to current background data and no statistical differences are detected, unless another method is deemed acceptable by the director.

Ohio EPA has reviewed the information provided and concurs that this data can be added to the background data group.

Mr. Edward Irelan, Manager of Operations

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Therefore, pursuant to OAC Rule 3745-27-10(C)(7)(g), the owner or operator is hereby authorized to update the background database for ammonia at monitoring wells MW-16 and MW-11 as detailed in the March 13, 2008 request.

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: Jodi Vaughan, Toledo-Lucas County Health Department  
Karen Okonta, Hull & Associates, Inc.  
Mike Beal, DDAGW, NWDO  
Jack Leow, DDAGW, NWDO  
Kimberly Burnham, DSIWM, NWDO