



State of Ohio Environmental Protection Agency

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April 14, 2009

Mr. Chris Jaquet  
Environmental Manager  
Allied Waste  
43502 Oberlin-Elyria Rd.  
Oberlin, Ohio 44074

**Re: BFI-Glenwillow Landfill, Cuyahoga County  
Ohio Administrative Code (OAC) Rule 3745-27-10(D)(7)(c)(ii) Approval**

Dear Mr. Jaquet:

On March 19, 2009, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northeast District Office (NEDO), received a document titled "Alternate Source Demonstration Report for Ammonia Exceedance at Downgradient Well GW-101S – 2008 Second Semiannual Monitoring Event" dated March 18, 2009, for the BFI-Glenwillow Landfill (Facility) located in Cuyahoga County. This document was submitted by Herst and Associates, Inc., and contains an OAC Rule 3745-27-10(D)(7)(c)(ii) demonstration for ground water monitoring well GW-101S for the October 10-16, 2008 second semiannual sampling event at the Facility.

According to the document, analysis of the ground water detection monitoring data indicated that the following statistically significant change was detected: ammonia in monitoring well GW-101S. Verification sampling was performed on December 10, 2008. The resampling data verified the statistically significant change for ammonia in monitoring well GW-101S.

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.

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

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The March 18, 2009 document concluded that the statistically significant change for ammonia at monitoring well GW-101S was a result of natural variation in ground water quality, and not as a result of impact from the landfill.

Ohio EPA has reviewed the applicable information and concurs with the demonstration in the March 18, 2009 document. Therefore, pursuant to OAC 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 well GW-101S.

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 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, OH 43215

If you have any questions concerning this letter, please contact Clarissa Gereby of Ohio EPA, NEDO at (330) 963-1224.

Sincerely,

William Skowronski, District Chief  
Northeast District Office  
for Chris Korleski, Director

cc: Scott Hester, DSIWM-CO  
Dane Tussel, CCBH