



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

January 2, 2009

**Re: Belmont County  
Tonkovich Trucking Company  
Compliance Evaluation Inspection  
Correspondence (IWW)**

Mr. Jim Tonkovich  
Tonkovich Trucking Company  
P.O. Box 208  
Shadyside, Ohio 43947

Dear Mr. Tonkovich:

On August 21, 2008, Jane Jacobs, of the Division of Drinking and Ground Waters, and I conducted a Compliance Evaluation Inspection (CEI) of the Tonkovich Trucking Company's fly ash disposal site. You represented the company during the inspection.

The purpose of the inspection was to evaluate your facility's status of compliance with the NPDES permit, federal number OH0076040, state number 0IN00037\*DD. Wastewater samples were not taken. A copy of the inspection report form is attached. Based on the inspection, and a review of the Monthly Operating Report (MOR) data and the permit, the facility appeared to be in compliance on the day of the inspection.

1. A review of the MORs since the last inspection on August 9, 2007, shows no effluent violations.
2. The pond was discharging only a trickle on the day of the inspection. The pond contains a significant amount of cattails. The operator should monitor the sediment level in the pond and remove the sediment when the pond becomes 60% full.
3. The facility has started to develop phase 2 (site 1) of the fill area. Drainage controls were being installed.
4. The NPDES permit renewal application has been submitted and the permit is being drafted. When you receive your copy of the draft permit, please read it carefully and comment to me within 30 days of receipt.
5. A complete groundwater monitoring review is attached. These are specific actions or comments that must be addressed by the facility regarding the groundwater monitoring plan:

- a. To comply with the approved ground water monitoring plan, a statistical analysis of the ground water data collected from monitoring wells surrounding the active site 1 fly ash landfill is required following the placement of ash in the site 1 area.
- b. As a reminder, the background water quality parameters listed on page 36 of the ground water monitoring plan and attached to this memo for reference, are required to be collected **only annually** after the first year of quarterly monitoring. These parameters are: alpha, beta, barium, calcium, chloride, iron, lead, magnesium, manganese, selenium, sodium. It appears that monitoring is occurring more frequently, which is unnecessary.

If you have any questions regarding the groundwater issues please contact Jane Jacobs at (740) 380-5235. For the other issues please contact me at (740) 380-5284 at your convenience.

Sincerely,



Ms. Abbot Stevenson  
Environmental Engineer  
Permits and Enforcement Section  
Division of Surface Water

AS/dh

Enclosures

# NPDES Compliance Inspection Report

## A. NATIONAL DATA SYSTEM CODING

Permit No.	NPDES No.	Date	Inspection Type	Inspector	Facility Type
OIN00037*DD	OH0076040	August 21, 2008	C	S	2

## B. FACILITY DATA

Name and Location of Facility Inspected	Entry Time	Permit Effective Date
Tonkovich Trucking Co., Flyash Disposal Site Mead Township Road 533, Belmont County Dilles Bottom	9:15 a.m.	July 1, 2003
	Exit Time	Permit Expiration Date
	9:45 a.m.	June 30, 2008

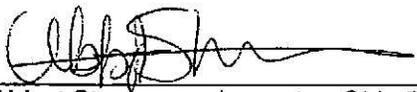
Name(s) and Title(s) of On-Site Representative(s)	Phone Number(s)
James Tonkovich, Owner	(740) 676-6130
Name, Address and Title of Responsible Official	Phone Number
James Tonkovich, President Tonkovich Trucking Company P.O. Box 208 Shadyside, Ohio 43947	(740) 676-6130

## C. AREAS EVALUATED DURING INSPECTION

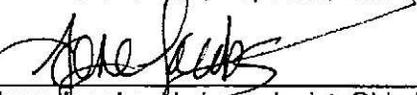
<input checked="" type="checkbox"/> S Permit	<input checked="" type="checkbox"/> S Flow Measurement	<input type="checkbox"/> NA Pretreatment
<input checked="" type="checkbox"/> S Records/Reports	<input checked="" type="checkbox"/> S Laboratory	<input type="checkbox"/> NA Compliance Schedules
<input checked="" type="checkbox"/> S Operations & Maintenance	<input checked="" type="checkbox"/> S Effluent/Receiving Waters	<input checked="" type="checkbox"/> S Self-Monitoring Program
<input checked="" type="checkbox"/> S Facility Site Review	<input type="checkbox"/> NA Sludge Storage/Disposal	<input type="checkbox"/> Other
<input type="checkbox"/> NA Collection System		

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

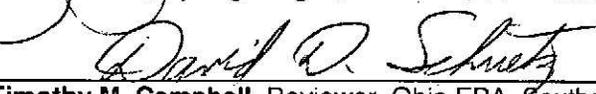
## D. SUMMARY OF FINDINGS/COMMENTS (attach additional sheets if necessary)

  
Abbot Stevenson, Inspector, Ohio EPA, Southeast District Office

1/2/09  
Date

  
Jane Jacobs, Hydrogeologist, Ohio EPA, Southeast District Office

1/2/09  
Date

  
Timothy M. Campbell, Reviewer, Ohio EPA, Southeast District Office

1/2/09  
Date



State of Ohio Environmental Protection Agency

**Southeast District Office**

2195 Front Street  
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490  
www.epa.state.oh.us

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

TO: Abbot Stevenson through Bruce Goff, DSW – SEDO  
FROM: Jane Jacobs through Mike Preston, DDAGW – SEDO  
SUBJECT: Five Year Review of GW Monitoring Data

FACILITY: Tonkovich Trucking , Tonkovich Fly Ash Fill II, Belmont Co., PTI# 17-1435

DATE: December 12, 2008

**INTRODUCTION**

Tonkovich Trucking is conducting ground water monitoring for a fly ash landfill in Belmont County. The facility recently moved into the Site 1 disposal area that is adjacent to the original acreage and is required to conduct a statistical analysis of the data.

The facility submits semi annual ground water data with the monthly operating reports. The purpose of this review is to determine if the facility is in compliance with the approved 1996 ground water monitoring plan that was included with the DSW Permit to Install.

**COMMENTS**

**1. Commencing with fly ash disposal in the Site 1 disposal area, the facility is required to conduct semi annual statistical analyses on the ground monitoring data from wells around Site 1. (Background well MW-6 compared to downgradient wells MW-1, MW-2, MW-3 and MW-4 and MW-5, or an intrawell comparison). The facility is required to submit the statistical analyses of the data within 75 days after the next semi annual sampling event.**

**The parameters to be used for statistical analyses are pH, alkalinity, specific conductance, sulfate and TDS. The parameters are listed on page 38 of the approved ground water plan and as a reference, are included as an attachment to this memo.**

The facility has been submitting background ground water monitoring data for the fly ash disposal area according to their approved ground water monitoring plan that was submitted with the WEC Hydrogeologic Investigation Report.

To comply with the approved ground water monitoring plan, a statistical analysis of the ground water data collected from monitoring wells surrounding the active Site 1 fly ash landfill is required following the placement of ash in the Site 1 area.

Ground water monitoring surrounding Site 2 is **not** required until Site 2 is constructed.

2. As a reminder, the background water quality parameters listed on page 36 of the ground water monitoring plan and attached to this memo for reference, are required to be collected **only annually** after the first year of quarterly monitoring. These parameters are: alpha, beta, barium, calcium, chloride, Iron, lead, magnesium, manganese, selenium, sodium.

3. The statistical procedures the facility intends to use to evaluate ground water quality are listed on page 42 of the of the ground water monitoring plan.

Please call me at 740-380-5235 if you have questions.

Attachments (2)

Lindsay Taliaferro III, DDAGW – CO (w/o attachments)

Parameters used as "indicators" of ground water contamination:

Alkalinity	10 ppm	14 days	310.1
pH	N/A	Immediate	150.1
Specific Conductivity	1 $\mu$ mohs/cm	28 days	120.1
Sulfate	10 mg/L	28 days	375.3
Total Dissolved Solids	1 mg/L	7 days	160.1

#### Frequency of Analysis

Background concentrations and contamination indicator parameters listed above shall be sampled and analyzed quarterly for one year prior to placement of fly ash materials in the new facility. After securing the initial first year of analysis all "background" quality parameter sampling shall be conducted annually, at a minimum. Samples collected for the ground water contamination as "indicators" shall be conducted semi-annually, at a minimum.

### 6.4 Quality Assurance/Quality Control

#### 6.4.1 Field (QA/AC)

To assure adequate quality assurance and quality control in the field, the sampling plan must be followed consistently and meticulously. If contamination of the ground water samples is suspected by sampling procedures a variety of samples and blanks shall be collected to serve as checks. Field duplicates shall be collected simultaneously with the primary samples at a specific locations. Analysis for both samples should yield very similar results. Duplicates should be collected at a frequency of one per ten samples.

**Trip Blanks** are generally prepared by the laboratory before entering the field. Containers are filled with analyte-free, distilled, deionized water and sealed. These blanks are taken to the field and handled along with the collected samples, thereby acting as a control sample to determine potential VOC contamination from the containers themselves or the atmosphere. At least one trip blank should accompany each sampling event. Trip blanks are never opened in the field.

Filtration of the extracted water sample may be required if the sample appears turbid. Proper sampling procedures will reduce the chance of stirring up the water and incurring sediments in the sample. Filtering, if required, shall incorporate the "open" system technique due to the fact that the most common method of sampling will probably employ a "bailer" type of sampler. This type of filtering process is performed immediately in the field, at the well head, and prior to sample acidification and containerization.

#### 6.3.4 Decontamination Procedures of Equipment

The following decontamination procedures shall be used to prepare all sampling and testing equipment prior to initial sampling and between well sampling to prevent cross-contamination. The decontamination area should be upwind of activities that may contribute dust or other contaminants to the solution used. Table 6 provides the proper procedures required for decontamination.

#### 6.3.5 Ground Water Sample Analysis

Parameters to establish "background" quality:

<u>Constituent</u>	<u>Detection Limit</u>	<u>Laboratory Holding Time</u>	<u>Analytical Method</u>
Gross Alpha Beta	3 pci/L	6 months	9310
Barium	100 ppb	6 months	208.1
Calcium	50 ppb	6 months	215.1
Chloride	10 ppm	28 days	4500-61-0
Iron	100 ppb	6 months	236.1
Lead	100 ppb	6 months	239.1
Magnesium	50 ppb	6 months	242.1
Manganese	50 ppb	6 months	243.1
Selenium	1 ppb	6 months	270.3
Sodium	100 ppb	6 months	273.1
pH	N/A	Immediate	150.1