



Environmental
Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

September 22, 2011

Paul Terrell
Village of Cedarville
Village Administrator
P.O. Box 51
Cedarville, Ohio 45314

**RE: Village of Cedarville Closed Landfill,
Semi-Annual Monitoring Well Sampling Report (dated July 8, 2011)
Notice of Violation**

Dear Paul Terrell:

At the request of the Division of Materials and Waste Management (D MWM), the Division of Drinking and Ground Water (DDAGW) has reviewed the groundwater monitoring data for the June 16, 2011, sampling event for the closed Cedarville Landfill. The laboratory report of the data was submitted on July 22, 2011 to Ohio EPA Southwest District Office (SWDO). The following violations and comments are a result of the review.

1. **The owner/operator of the closed Cedarville Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(8).** No statistical analysis of the semi-annual ground water data was submitted as required by OAC Rule 3745-27-10(C)(8) which states;

Determination of a statistically significant increase over background. The owner or operator shall determine whether or not there is a statistically significant increase over background for each parameter or constituent required to be statistically analyzed within the ground water monitoring program. The owner or operator shall make this determination each time he assesses ground water quality. To determine whether a statistically-significant increase or decrease has occurred, the owner or operator shall compare the ground water quality of each parameter or constituent at each downgradient ground water monitoring well to the background value of that parameter or constituent according to the statistical procedures specified in paragraphs (C)(6) and (C)(7) of this rule.

In order to return to compliance, Cedarville needs to begin statistically evaluating and reporting semi-annual detection monitoring data for appendix I parameters (1-15 and 63-66) in accordance with OAC Rule 3745-27-10(C)(8).

- 2. The owner/operator of the closed Cedarville Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(3)(b).** No determination of the direction of groundwater flow was made for the uppermost aquifer as required by OAC Rule 3745-27-10(C)(3)(b), which states;

The owner or operator shall at least semiannually and in conjunction with any major sampling event involving more than half the wells in the system or zone monitored determine, for the uppermost aquifer system and for all significant zones of saturation monitored, the direction of ground water flow each time ground water elevation measurements are performed.

No determination of ground water flow direction was made for the uppermost aquifer for the June 16, 2011 sampling event. As requested in a meeting at Cedarville on 5/20/2010, the Village provided the Ohio EPA with surveyed well data on July 28, 2010. This information makes it possible for potentiometric surface maps (ground water flow maps) of the uppermost aquifer system and/or significant zones of saturation to be constructed. To date, no ground water flow maps have been submitted as required by rule. In order to return to compliance, Cedarville needs to determine the direction of ground water flow each time ground water elevation measurements are obtained and submit the information with each semiannual report.

- 3. The owner/operator of the closed Cedarville Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(3)(d).** Potentiometric surface maps were not submitted as required by OAC Rule 3745-27-10(C)(3)(d) which states;

Potentiometric maps shall be constructed using the collected ground water elevation measurements and shall be included with the sampling data submittal.

- 4. The owner/operator of the closed Cedarville Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(10)(b), (e) and (f).** The information provided by the facility only included the analytical results from the laboratory and did not include the following: field and laboratory quality assurance

/ quality control data, statistical analysis, or potentiometric maps results as required by OAC Rule 3745-27-10(C)(10)(b), (e), and (f). This information must be submitted with each semi-annual sampling data submittal.

5. **The owner/operator of the closed Cedarville Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10 (D)(5)(a)(i)(b) and OAC 3745-27-10 (D)(5)(a)(iii).** OAC 3745-27-10(D)(5)(a)(i)(b) and OAC 3745-27-10(D)(5)(a)(iii) requires that for *“monitoring wells screened within the uppermost aquifer system beneath the sanitary landfill facility, the owner or operator shall, during the active life of the facility (including final closure) and the post-closure care period, monitor the wells for... parameters 1 through 66 in appendix I of this rule or the alternate and statistically analyze the results from wells screened in the uppermost aquifer system for the parameters specified in paragraph (D)(5)(a)(i).”*

The Cedarville Landfill has not been sampling Zinc (appendix I – constituent 15) on a semi-annual basis since at least the December 2008 2nd semi-annual sampling event. Additionally, no appendix I parameters (including zinc) have been statistically evaluated since groundwater monitoring at the landfill commenced (other than time series graphs).

In order to return to compliance, Cedarville must sample and statistically evaluate all wells on a semi-annual basis for appendix I parameters (1-15 and 63-66) in accordance with the above specified rule.

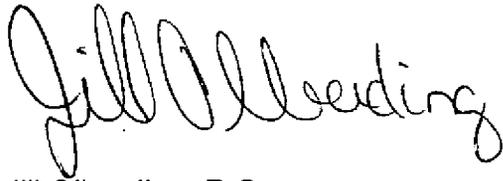
6. **The owner/operator of the closed Cedarville Landfill is in violation of Ohio Administrative Code (OAC) Rule 3745-27-10 (A)(5).** OAC Rule 3745-27-10 (A)(5) requires that a qualified groundwater scientist shall certify, in accordance with Rule 3745-27-09 of the Administrative code, any reports and data, submitted in accordance with the rule.

No certification statement by a qualified ground water scientist appeared in the Village of Cedarville's Semi-Annual Monitoring Well Sample Collection Report (dated July 8, 2011). To return to compliance, Ohio EPA requests that Cedarville consult with a qualified ground water scientist regarding any future data submittal and ensure that an appropriate certification statement appears in all future semiannual reports.

Paul Terrell
Village of Cedarville Closed Landfill
September 22, 2011
Page 4 of 4

Please respond in writing commenting individually on violations one through six, noted above. This correspondence is requested with the 60 days of receipt. If each violation is not addressed enforcement may be pursued. If you have any questions please contact John McGinnis or Jill Olberding at (937) 285-6357.

Sincerely,

A handwritten signature in black ink that reads "Jill Olberding". The signature is written in a cursive, flowing style.

Jill Olberding, R.S. :
Division of Materials and Waste Management

cc: Cedarville Village Council
John McGinnis, Ohio EPA DDAGW/SWDO

ec: Debbie Leopold, Greene County Combined Health District

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