



State of Ohio Environmental Protection Agency

Northeast District Office

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Twinsburg, Ohio 44087

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

January 21, 2010

**RE: CENTRAL WASTE  
GROUND WATER**

Tom Johnson  
Central Waste, Inc.  
12003 Oyster Road  
Alliance, OH 44601

Dear Mr. Johnson:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the following document:

Response to Ohio EPA Comments dated July 2, 2009, Regarding September 12, 2007 RTC to Ohio EPA NOV's dated June 12, 2007, June 14, 2007, and July 18, 2007, dated October 13, 2009

The document was submitted by Eagon & Associates, Inc. on behalf of Central Waste Landfill. The document was received at the Northeast District Office of Ohio EPA on October 14, 2009. The document contains detailed responses to an Ohio EPA response to a notice of violation, dated July 2, 2009.

Ohio EPA has determined the following:

1. The owner/operator has adequately responded to the June 14, 2007, Notice of Violation issued by Ohio EPA for failing to comply with OAC Rules 3745-27-10(C)(1)(a) and 3745-27-10(C)(10). The owner/operator submitted the necessary documentation for the June 2006 semiannual event in the subject document listed above. As such, the owner/operator returned to compliance with these rules on October 13, 2009.
2. The owner/operator has adequately responded to the July 18, 2007, Notice of Violation issued by Ohio EPA for failing to comply with OAC Rules 3745-27-10(B)(3) and 3745-27-10(C)(1). The owner/operator initially concluded that there was no correlation between thallium and barium concentrations and well turbidity in ground water samples from MW-16D. Ohio EPA's review of this data indicated otherwise. Ohio EPA followed up with Eagon & Associates, Inc. via electronic mail correspondence dated December 4, 2009 (Attachment 1), questioning whether or not this interpretation was correct. Ohio EPA was able to visually identify correlations between elevated well turbidity and increased barium and thallium concentrations. While the correlation isn't a direct one to one correlation, it is visually apparent that elevated turbidity (typically above 40 NTUs) coincides with elevated barium and thallium concentrations. Once turbidity drops below 40 NTUs thallium becomes completely non-detect and barium concentrations drop from a range of 200-250 mg/L to a range of 150-200 mg/L. In a conference call on

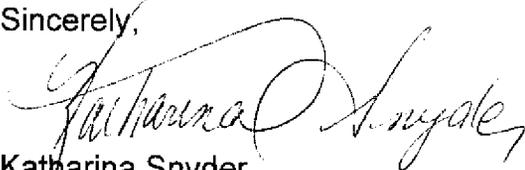
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December 9, 2009, between myself (Mark Kroenke, Ohio EPA-DDAGW), and Mr. Tom Jenkins and Ms. Shay Beanland of Eagon & Associates, Inc., it was agreed that a turbidity correlation above 40 NTUs, though not direct, seemed to be impacting thallium and barium concentrations in ground water samples from MW-16D. While MW-16D is currently an assessment well, and background from this well is currently not being utilized, it was agreed that the turbidity impacted concentrations for thallium and barium would be censored or removed from the background dataset of MW-16D in the event the well is ever returned to detection monitoring. As such, the owner/operator returned to compliance with these rules on October 13, 2009.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the Entity from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts for remedying conditions resulting from any release of contaminants to the environment.

If you have any questions concerning this letter, please contact me at (330) 963-1257.

Sincerely,



Katharina Snyder  
Division of Solid and Infectious Waste Management

KS:cl

cc: Mark Kroenke, DDAGW-NEDO  
Mary Helen Smith, Mahoning County Health Department  
File: [Sowers/LAND/CENTRAL/GRO/50] DSIWM # 125, 220, and 364