



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

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

August 11, 2009

**RE: HOLMES COUNTY LANDFILL
GROUND WATER**

CERTIFIED MAIL

Frank Lasky, Jr.
c/o World Resource Land Management, Inc.
1422 East Avenue
Erie, PA 16503

Joe Miller, Chairman
Holmes County Board of Commissioners
2 Court Street, Suite 14
Millersburg, OH 44654

Dear Mr. Lasky and Mr. Miller:

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

**November 2008 Semi-annual Ground Water Report
Holmes County Landfill
Hardy and Prairie Townships, Holmes County, Ohio**

The document was prepared and submitted to the Northeast District Office (NEDO) of Ohio EPA by North Point Engineering and KU Resources, on the behalf of the Holmes County Board of Commissioners and World Resource Land Management, Inc. The report is dated January 30, 2009; and was received at NEDO on February 2, 2009.

Holmes County Landfill is operating under the revised 2003 Solid and Infectious Waste Regulations, and required to conduct semi-annual ground water detection monitoring in accordance with OAC 3745-27-10 (D). The report was reviewed for compliance with OAC 3745-27-10 (C)(10) and 3745-27-10 (D) of the 2003 revised Solid and Infectious Waste regulations.

Ohio EPA has identified the following violation:

The owner/operator of Holmes County Landfill is in violation of OAC 3745-27-10 (C)(1) requiring the ground water sampling and analysis procedures are capable of providing monitoring results that are an accurate representation of ground water quality. Ground water monitoring wells UZ-7, UZ-9, UZ-11, and LZ-12; were purged of three well volumes of water on November 18, 2008. Water level measurements collected immediately at the end of each well purging indicate that there was sufficient recovery for ground water sampling to occur.

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However, ground water samples were not immediately collected from the above wells for geochemical analysis after they were purged. Instead, they were collected approximately 24 hours later the following day on November 19, 2008. Field parameters such as temperature and pH measured immediately before sample collection on November 19, 2009 were significantly different than those measured at the end of well purging on November 18, 2008. This indicates the water samples collected on November 19, 2009, are not representative of actual ground water quality.

Chapter 10: GROUND WATER SAMPLING of the Ohio EPA TECHNICAL GUIDANCE FOR GROUND WATER INVESTIGATIONS recommends monitoring wells should be sampled immediately after purging, unless site-specific conditions preclude it (e.g., if some wells are too low-yielding). This minimizes the time for physical and chemical alteration of water in the well casing.

To return to compliance, the facility owner/operator of Holmes County Landfill needs to collect ground water samples immediately after purging to ensure monitoring results that provide an accurate representation of ground water quality.

Ohio EPA has the following recommendation:

A majority of the ground water monitoring wells were purged dry prior to obtaining three well volumes of purged water. Ground water samples were collected from the wells that were purged dry after water levels had sufficiently recovered approximately 24 hours later.

Water level measurements collected just prior to sampling indicate that most of the wells had fully recovered to the initial water levels before purging. This may indicate ground water samples can be collected within a relatively shorter time than 24 hours of purging the wells to dryness. Chapter 10: GROUND WATER SAMPLING of the Ohio EPA TECHNICAL GUIDANCE FOR GROUND WATER INVESTIGATIONS recommends for wells purged to dryness that *"In the case of a well with very slow recharge, sample collection should be attempted at least every 24 hours."* The guidance manual further indicates that *"samples should be taken as soon as there is a sufficient amount of water. As extended recovery times after purging (hours) allow the ground water to equilibrate with atmospheric conditions."*

Ohio EPA recommends the owner/operator of Holmes County Landfill collect additional interim water level measurements between the time ground water monitoring wells are purged dry and sampled, to determine when water levels have sufficiently recovered for the wells to be sampled. This will ensure that the ground water monitoring wells are sampled within a reasonable amount of time following purging, and conformance with OAC 3745-27-10 (C)(1), which requires, in part, that the ground water monitoring program shall include *"sampling and analysis procedures that are designed to ensure monitoring results that provide an accurate representation of ground water quality."*

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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.

Please submit a response to this letter by September 11, 2009. 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: Doug Dobransky, DDAGW-NEDO
Kelly Jeter, DSIWM-CO
Jon Croup, Holmes County Health Department
Jerry Galbraith, Director of Environmental Management
File: [Sowers/Land/HOLMES/GRO/38]

DSIWM #2248

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Frank Lasky, Jr.
c/o World Resource Land Management, Inc.
1422 East Avenue
Erie, PA 16503

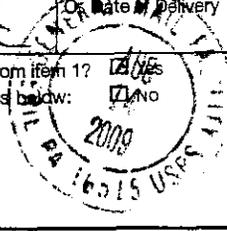
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1. Article Addressed to:

Joe Miller, Chairman
Holmes County Board of Commissioners
2 Court Street, Suite 14
Millersburg, OH 44654

2. Article Number
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