

2011

**Environmental
Protection Agency**

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

May 25, 2011

**RE: RITTMAN PAPERBOARD
NOTICE OF VIOLATION
GROUND WATER
WAYNE COUNTY**

CERTIFIED MAIL

Mr. Gary McQuate,
RPB Manager
Rittman Paperboard Landfill
100 Industrial Ave.
Rittman, Ohio 44270-1573

Dear Mr. McQuate:

On June 5, 2006, the Ohio Environmental Protection Agency (Ohio EPA), Division of Materials and Waste Management (DMWM), Northeast District Office (NEDO), received a document entitled, "Shallow Ground Water Quality Assessment Plan for Rittman Paperboard Residual Waste Landfill," located in Wayne County and was dated June 2, 2006. On April 15, 2011, the Ohio EPA, Division of Drinking and Ground Waters (DDAGW), Northeast District Office (NEDO), received a document entitled, "Deep Aquifer Ground Water Quality Assessment Plan," and was dated June 2, 2006. These documents were submitted by Bowser-Morner on behalf of Caraustar Mill Group, Inc. as partial fulfillment of Ohio Administrative Code (OAC) Rule 3745-30-08.

Rittman Paperboard operates a Class III Residual Waste Landfill currently owned and operated by Caraustar Mill Group, Inc. The PTI #02-5056 was approved on June 4, 1997. The landfill received waste from the pulp and paper making operations conducted at the facility. Rittman Paperboard closed and ceased production of paper materials in 2006. The Residual Waste Landfill currently only receives paperboard waste sludge removed from the north lagoons and dried prior to placement within the permitted limits of waste placement.

The following violations of rule or statute were identified during the review of the subject documents:

1. **OAC Rule 3745-30-08(E)(1)**: *Submittal of a Ground Water Quality Assessment Plan (GWQAP).*

Rittman Paperboard has submitted separate GWQAPs for the shallow and the deep hydrostratigraphic units. The ground water assessment monitoring system should not be segregated into shallow and deep GWQAPs.

Rittman Paperboard should revise the GWQAPs such that the two plans are combined into one stand-alone GWQAP.

2. **OAC Rule 3745-30-08(E)(1)(b)(i)**: *A description of the Detection Monitoring Program implemented by the landfill facility, including:*

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- (i) *Number location, depth, and construction of detection monitoring wells with documentation, and analytical data.*

Rittman Paperboard has not adequately described the Detection Monitoring Program. Specifically, Rittman Paperboard has not provided the boring logs and well construction diagrams for the ground water monitoring wells within the Detection Monitoring Program.

Rittman Paperboard should revise the GWQAP to include the boring logs and well construction diagrams of all ground water monitoring wells within the Detection Monitoring Program.

- 3. **OAC Rule 3745-30-08(E)(1)(b)(ii)**: *A description of the Detection Monitoring Program implemented by the landfill facility, including:*

- (ii) *A summary of detection monitoring ground water analytical data.*

Rittman Paperboard has not adequately described the Detection Monitoring System. Specifically, Rittman Paperboard has not provided the historical ground water monitoring data from the Detection Monitoring System.

Rittman Paperboard should revise the GWQAP to include a summary table identifying the ground water monitoring wells within the Detection Monitoring System, sampling dates, the sampling parameters, units of measure, and analytical laboratory results.

- 4. **OAC Rule 3745-30-08(E)(1)(b)(iii)**: *A description of the Detection Monitoring Program implemented by the landfill facility, including:*

- (iii) *A summary of statistical analyses applied to the data.*

Rittman Paperboard has not provided a summary of the historical resultant statistical analyses applied to the data.

Rittman Paperboard should revise the GWQAP to include a table summarizing the historical statistical analyses applied to the data and the results of these statistical analyses.

- 5. **OAC Rule 3745-30-08(E)(1)(c)(i)**: *The proposed number, location, depth, installation method, and construction of assessment monitoring wells.*

Rittman Paperboard has not adequately proposed the number, location, depth, installation method, and construction of assessment monitoring wells to be installed in order to adequately determine the rate, concentration, and extent of ground water contamination migration within the shallow zone.

Rittman Paperboard should revise the GWQAP to include the installation of ground water monitoring wells to assess the extent and concentration of ground water contamination migration within the shallow zone.

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6. **OAC Rule 3745-30-08(E)(1)(d)**: *A detailed description of the techniques, procedures, and analytical equipment to be used for ground water sampling during the assessment, including but not limited to the items listed in paragraphs (C)(1)(a) to (C)(1)(g) of this rule.*

Rittman Paperboard has not adequately provided a complete ground water sampling and analysis plan in accordance with OAC Rule 3745-30-08(E)(1)(d).

Rittman Paperboard should revise the GWQAP to include a complete ground water sampling and analysis plan that conforms to OAC Rule 3745-30-08(E)(1)(d) for all ground water monitoring wells and surface water sampling locations at the facility.

7. **OAC Rule 3745-30-08(E)(1)(e)(i)**: *Planned use of statistical data evaluation.*

Rittman Paperboard has provided the Statistical Analysis Plan (Revised May 30, 2000). This Statistical Analysis Plan has been previously identified by the Ohio EPA to be deficient.

Rittman Paperboard should revise the Statistical Analysis Plan within the GWQAP to conform to the Statistical Analysis of Ground Water Monitoring Data at RCRA Facilities Unified Guidance March 2009 - EPA 530/R-09-007 U.S. EPA.

8. **OAC Rule 3745-30-08(E)(1)(e)(iv)**: *Criteria which will be utilized to determine if additional assessment activities are warranted.*

Rittman Paperboard has not adequately proposed criteria that will be utilized to determine if additional assessment activities are warranted.

Rittman Paperboard should revise the GWQAP to include proposed criteria that will be utilized to determine if additional assessment activities are necessary.

9. **OAC Rule 3745-30-08(E)(1)(f)**: *A schedule of implementation.*

Rittman Paperboard has not adequately provided a schedule of implementation of the assessment program.

Rittman Paperboard should revise the GWQAP to include a schedule of implementation of the GWQAP.

In addition to the above cited violations, Ohio EPA has the following comments:

1. Table 5 references Tables 3A, 3B, and 3C. The GWQAP does not contain tables 3A, 3B, and 3C.
2. The shallow ground water flow map should have an indication of where the slurry wall is located.

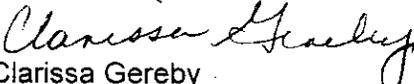
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3. Flow direction within the shallow zone does not reflect the influence of surface water and the slurry wall.
4. Figure 3 Water Sampling Field Data Record Sheet – there is no indication of a start and stop time of purging. In addition, there is no indication of field measurements of parameters per well volume.
5. The Appendices are a mixture of alphabetic and numeric. Rittman should revise the Appendices to be either alphabetic or numeric.
6. Figure 2 identifies ground water monitoring well 12B when it is properly identified as 12R.

Please revise the GWQAP as necessary and address the above comments within 60 days of the receipt of this correspondence. If you have any technical questions regarding this review, please contact Jeff Rizzo, Division of Drinking and Ground Waters, Northeast District Office, Ohio EPA at (330) 963-1115. Please submit all correspondence to Clarissa Gereby, Division of Materials and Waste Management, Northeast District Office, Ohio EPA, 2110 East Aurora Road, Twinsburg, Ohio 44087.

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 Chapter 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act or the Resource Conservation and Recovery Act, or the Comprehensive Environmental Response, Compensation, and Liability Act or from other applicable requirements for remedying conditions resulting from any release of contaminants to the environment.

Sincerely,


Clarissa Gereby
Environmental Specialist
Division of Materials and Waste Management

CG/cl

cc: Ken Eng, Wayne County Health Department
Jeff Rizzo, DDAGW, NEDO
Julie Hewlett, Bowser-Morner, Inc.
File:[Kurko/LAND/RITTMAN PAPERBOARD/GRO/85]

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Mr. Gary McQuate, RPB Manager
 Rittman Paperboard Landfill
 100 Industrial Ave.
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