



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Ashland County Landfill  
Ground Water

August 11, 2008

Ashland County Commissioners  
Ashland County Courthouse  
110 Cottage Street  
Ashland, Ohio 44805

Dear Commissioners:

The owner/operator is currently required to perform ground water detection monitoring activities at the facility. Well SW-9 is in assessment monitoring due to the detection of volatile organic compounds. Well BW-9 is in assessment monitoring due to a statistically significant increase in chloride concentrations. Well SW-3 is in assessment monitoring due to statistically significant increases in sodium and chloride concentrations. The Ohio Environmental Protection Agency (Ohio EPA) reviewed the Statistical Report of Groundwater Quality (received from Hull and Associates, Inc. (HAI)) on behalf of the owner/operator.

Ohio EPA has reviewed the above referenced report, received May 30, 2008 for Ashland County Landfill for compliance with ground water monitoring requirements of Ohio Administrative Code Rule (OAC) 3745-27-10(D). The following are Ohio EPA's findings from the review.

**Violations**

1. ***Ashland County Landfill is in violation of OAC Rule 3745-27-10(E)(4)(g) and OAC Rule 3745-27-10(E)(4)(h) for not installing additional monitoring well(s) downgradient of affected well SW-9 in accordance with the Groundwater Quality Assessment Plan, revision of June, 2005. To return to compliance, the facility must begin work on the drilling and sampling of additional assessment monitoring wells related to SW-9 during the summer/fall field season of 2008.***

The assessment plan states in part on page 16, last paragraph, "Installation of the additional monitoring wells will be initiated during the fall of 2005". To date, no additional assessment wells have been installed, and "evaluating the need to install additional assessment wells" as noted in previous correspondence from HAI is not acceptable. The rate and extent of volatile organic compounds (VOCs) has not been determined beyond the location of SW-9. Although some seasonal variation in ammonia-nitrogen and cis-1,2 dichloroethylene concentrations has been observed by Ohio EPA, the concentrations of these two compounds do not show an overall decreasing trend.

## Statements

- Uppermost aquifer monitor well BW-9 is in assessment monitoring due to a statistically significant increase in chloride concentrations. The data from the March, 2008 sample event indicates that a statistically significant increase for barium was "calculated" at BW-9. Ohio EPA has observed an ongoing point of confusion, in the use of the phrase or terms "calculated" but not "validated" statistical significance whenever a new parameter is found to be above intra-well background. Concentration values above a calculated statistical level derived from an acceptable statistical method does result in a "validated" statistical significance for that parameter.***

Ohio EPA would like to remind HAI that in accordance with OAC 3745-27-10(E)(9)(a): "If the owner or operator determines that the concentrations of all waste derived constituents are shown to be at or below background values, using the statistical procedures described in paragraph (C)(6) of this rule for two consecutive sampling events, then the owner or operator may request, in writing that the director approve reinstatement of the detection monitoring program..." The facility remains in assessment monitoring for chloride at monitor well BW-9, which is a "validated" statistical significance. In accordance with the above cited rule, a request for return to detection monitoring for well BW-9 cannot be accommodated unless all waste derived constituents are shown to be at or below background levels.

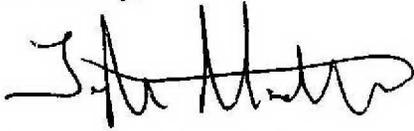
- Laboratory Analytical Data Summary Tables in Appendix B are using a type font of such a small size that it is necessary to use a magnifying glass to review the data. In particular, the heading with the well locations could be made larger without revising the data tables. It is becoming increasingly difficult to ascertain the difference between what is "SW-3 or BW-3 or BW-9" even with the use of a magnifying glass.***

At a minimum, please revise the data tables in future reports to use a larger font on the header, and consider going to larger font for the entire table in order to expedite the regulatory review of these ongoing reports.

Ashland County Commissioners  
August 11, 2008  
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If you have any questions please feel free to contact Dale Mc Lane at the Ohio EPA Northwest District Office (419-373-3099). Any written correspondence should be sent to the attention of Tyler Madeker, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Tyler Madeker, S.I.T.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

/lb

pc: Pat Donaldson, Ashland County Health Department  
William Petruzzi, Hull & Associates, Inc.  
Dale McLane, DDAGW-NWDO

~~NWDO File: Ashland County, Ashland County Landfill, Groundwater~~

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