



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

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

Re: Closed Putnam County Landfill
Putnam County
Ground Water

January 8, 2009

Putnam County Commissioners
245 East Main Street, Suite 101
Ottawa, Ohio 45875

Dear Commissioners:

On November 21, 2008 the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received the September 2008 Semiannual Groundwater Monitoring Report, dated November 19, 2008, for the Putnam County Landfill. The submittal was reviewed to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-10. Below are Ohio EPA's comments regarding the review.

COMMENTS

Violations

1. **The owner/operator is in violation of OAC Rule 3745-27-10(C)(1)(a) requiring adherence to the procedures in the sampling and analysis plan (specifically regarding field parameter stabilization during purging). To avoid future violations of this rule, well purging and field parameter stabilization needs to be performed in accordance with the sampling and analysis plan.**

OAC Rule 3745-27-10(C)(1)(a) requires that the owner/operator use the procedures documented within the sampling and analysis plan. The sampling and analysis plan (SAP) is documented within the Ground Water Detection Monitoring Plan (GWDMP) for the facility.

Regarding well purging, the GWDMP documents *"Up to five well volumes will be removed if field-measured parameters specific conductance, temperature, and pH have not stabilized within ± 3 percent, $\pm 0.5^{\circ}\text{C}$, and ± 0.1 S.U., respectively, over three consecutive measurements."* However, these procedures for field parameter stability were not followed at monitoring wells MW-2, MW-3R, MW-4RR, MW-8 and MW-9RR. Specifically, purging at these wells ceased at three well volumes, but the field parameters had not adequately stabilized.

Statements

2. **The ground water sampling crew does not need to continue to dispose of purge water from MW-9RR into the leachate collection tank.**

The field sampling data sheet for MW-9RR indicates that the purge water from MW-9RR was contained and was poured into the leachate collection tank. This procedure was implemented because MW-9RR had been in the ground water quality assessment monitoring program. However, MW-9RR was reinstated to the detection monitoring program in September 2007. Therefore, purge water from MW-9RR can be disposed on the ground away from the well, in accordance with the GWDMP.

If you have any questions please feel free to contact Ken Brock at the Ohio EPA Northwest District Office (419-373-3143). Any written correspondence should be sent to the attention of Brent Goetz, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Brent M. Goetz, SIT
Environmental Specialist
Division of Solid and Infectious Waste Management

/csl

pc: Beth Brown, Eagon & Associates, Inc.
File: Putnam County, Putnam County Landfill, Ground Water

ec: Jack Leow, DDAGW, NWDO
Ken Brock, DDAGW, NWDO
Mike Reiser DSIWM, NWDO

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