



State of Ohio Environmental Protection Agency

**Northwest District Office**

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

Re: Closed Putnam County Landfill  
Ground Water  
REVISION of July 11, 2007, letter

July 19, 2007

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

Dear Commissioners:

On July 11, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) provided comments to the Putnam County Commissioners regarding the March 2007, Sampling Report, dated May 24, 2007, for the Putnam County Landfill. However, upon additional review, it proved necessary to provide this correspondence as an addendum to the July 11, 2007, letter. Below are Ohio EPA's additional comments regarding the Report.

**COMMENTS**

**Statements**

1. Ohio EPA provided comments regarding the March 2007, sampling report for the facility in a letter dated July 11, 2007. However, Comment No. 3 of the July 11, 2007, letter is in error.

Comment No. 3 of the July 11, 2007, letter stated "...if the owner/operator does not receive approval to continue detection monitoring for **both of these statistically significant increases at MW-1 by October 8, 2007 (210 days after March 12, 2007, initiation of sampling event)**, then the owner/operator will be required to implement a ground water quality assessment monitoring program for MW-1 by **October 8, 2007.**"

However, prior to the March 2007, sampling event, sodium was statistically significant at MW-1 during the September 2006, sampling event. The owner/operator submitted a demonstration in accordance with OAC Rule 3745-27-10(D)(7)(c)(ii) for this statistically significant increase. As documented in the March 13, 2007, letter from Ohio EPA regarding the demonstration, the Director refused to grant approval to continue detection monitoring for MW-1.

Therefore, the deadline for receiving approval for a demonstration in accordance with OAC Rule 3745-27-10(D)(7)(c)(ii) for MW-1 expired on April 25, 2007, (210 days after September 27, 2006 sampling event), rather than on the future date of October 8, 2007, specified in the July 11, 2007, letter from Ohio EPA. Because of this, the owner/operator was required to implement a ground water quality assessment program for MW-1 by April 25, 2007, (see Comment No. 2 below).

### Violations

2. OAC Rules 3745-27-10(E)(3) and (E)(5)(a)(i): As detailed below, the owner/operator is in violation of OAC Rules 3745-27-10(E)(3) and (E)(5)(a)(i).

OAC Rule 3745-27-10(E)(3) requires that **"Within one hundred and thirty-five days of notifying Ohio EPA of a statistically significant increase over background...the owner or operator shall submit to the Ohio EPA, and to the operating record...a ground water quality assessment plan."**

Further, OAC Rule 3745-27-10(E)(5)(a)(i) requires that **"Within one hundred thirty-five days of notifying Ohio EPA of a statistically significant change...the owner or operator shall...Sample the affected well(s) and analyze the samples for all waste-derived constituents, including all constituents listed in Appendix I and Appendix II of this rule..."**

Ohio EPA was notified of the statistically significant increase of sodium at MW-1 on December 8, 2006, (notification: Ohio EPA receipt of sampling report for the September 2006, sampling event). Therefore, the deadline for submitting the ground water quality assessment plan for MW-1 and for the Appendix II sampling of MW-1 expired April 23, 2007, (first weekday occurring 135 days after December 8, 2006 notification).

The owner/operator has implemented a ground water quality assessment program and Ground Water Quality Assessment Plan (GWQAP) for MW-9RR. However, to date, a GWQAP has not been submitted for MW-1. Further, to date, Appendix II sampling has not been performed for MW-1.

Therefore, the owner/operator is in violation of OAC Rules 3745-27-10(E)(3) and (E)(5)(a)(i). To regain compliance with OAC Rules 3745-27-10(E)(3) and (E)(5)(a)(i), the owner/operator must submit a GWQAP for MW-1 and perform Appendix II sampling for MW-1. Both of these actions must be completed as soon as possible and all necessary documentation submitted to Ohio EPA.

If you have any questions, please contact Ken Brock at the Ohio EPA Northwest District Office (419) 373-3143.

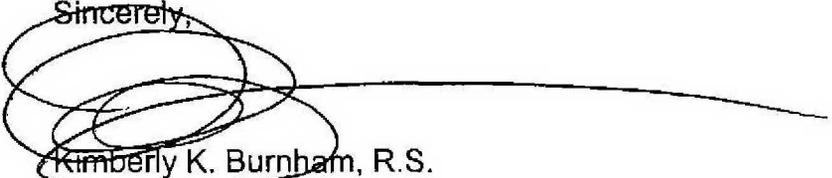
Putnam County Commissioners

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Any written correspondence should be sent to the attention of Kimberly Burnham, Division of Solid and Infectious Waste Management, Ohio EPA Northwest District Office, 347 N. Dunbridge Road, Bowling Green, Ohio 43402.

Sincerely,



Kimberly K. Burnham, R.S.

Environmental Specialist

Division of Solid and Infectious Waste Management

//lr

pc: Beth Brown, Eagon & Associates, Inc.

Ken Brock, DDAGW, NWDO

<File: Putnam County, Putnam County Landfill, Ground Water >

ec: JL

i.d.: 5-6981 Addendum