



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Wales Road Landfill
Ground Water

October 1, 2010

Mr. Ed Ciecka, Administrator
City of Rossford
133 Osborn Street
Rossford, Ohio 43460

Dear Mr. Ciecka:

The Ohio Environmental Protection Agency (Ohio EPA) reviewed the June 30, 2010 response to Ohio EPA's May 19, 2010 comments. The City of Rossford (owner/operator) is required to conduct ground water monitoring at the Rossford City/Wales Road Landfill (facility) in accordance with Findings and Orders, dated September 30, 1999, and OAC 3745-27-10, effective August 15, 2003. The ground water quality monitoring wells are in detection monitoring, while well MW-2B is in the facility's compliance monitoring program. The May 19, 2010 letter provided Ohio EPA's comments regarding the owner/operators report documenting the December 2009 Sampling Event. Ohio EPA reviewed the June 30, 2010 response with respect to the May 19, 2010 letter and OAC Rule 3745-27-10.

COMMENTS

Evaluation of Owner or Operator's Response to Previously Cited Violations

1. **The City of Rossford has adequately responded to Comment 1 in Ohio EPA's letter dated May 19, 2010. The City has returned to compliance with OAC Rule 3745-27-10(E)(10) by submitting the semiannual determination of rate, extent, and concentration. This information appears under separate cover in the facility's revised Compliance Monitoring Plan, which Ohio EPA received on July 19, 2010.**

More Information to Determine Compliance

2. **Compliance with OAC Rule 3745-27-10(B)(3)(e), which requires the monitoring wells, piezometers, and other measurement, sampling, and analytical devices be operated and maintained to perform to design specifications throughout the life of the monitoring program, cannot be determined at this time. For Ohio EPA to determine compliance, the City must document the reason for the erratic water level changes measured at piezometer P-1 from June 2007 through December 2009.**

The City of Rossford states that piezometer P-1 is damaged and that the City proposes to decommission the well in the near future. The City's response did not describe the reason the well is damaged, describe the damage, or discuss how the damage affects water levels in the well. The City needs to clarify these issues in order to make appropriate decisions about the future use of this well. Until this is clear, it remains uncertain whether the measurements represent either faulty equipment or significant changes in the hydrogeologic

system. It is unknown if the observances at P-1 are related in any way to either the rapid drop in UAS water levels recorded at the landfill between September 1997 and January 2001; or the gradual rebound in water levels apparent at all other UAS wells since late 2004. Their causes are also unknown.

The UAS water levels may be influenced by industrial water wells located approximately 0.75 mile north of the landfill. These wells are identified as 313-R and 314-R in the 1991 USGS Water Resources Investigations Report #91-4024 (see Plate 1, Plate 5, and Table 3 in the referenced report for more information). The Libby-Owens-Ford Glass Company originally owned well 313-R according to the driller's log (ODNR Water Well Log and Drilling Report #9990929). The Pilkington glass company may be the present owner of these wells. Ohio EPA recommends the City contact the owner of wells 313-R and 314-R to confirm whether the wells are being pumped. Other useful information is to know how frequent the industrial wells were pumped in the past, to know how frequently the wells are pumped at present along with the pumping rates, and to know the affects these or additional industrial wells have on the ground water flow regime under the landfill.

3. **Compliance with OAC Rule 3745-27-10(C)(7)(a), which requires, if the distribution of the chemical parameters or waste-derived constituents is shown by the owner or operator to be inappropriate for a normal theory test, then the data should be transformed or a distribution free theory test should be used, cannot be determined at this time. For Ohio EPA to determine compliance, the City must show whether or not the distribution of the raw or untransformed data is appropriate for a normal theory test before applying a transformation to the data.**

The City must test the raw data sets below for normality and submit the results in order for Ohio EPA to determine compliance with this rule for the December 2009 Sampling Event.

- Ammonia at monitoring wells 11TR and 12TR;
- Barium at monitoring wells 1B, 11BR, and 12BR;
- Chloride at monitoring wells 1T, 2T, 3T, 10TR, 11TR, 1B, 3BR, and 11BR;
- Potassium at monitoring wells 1T, 10TR, 11TR, 12TR, 1B, 11BR, and 12BR;
- Sodium at monitoring wells 1T, 10T, 12TR, 2B, and 12BR; and

The City has submitted revisions to the Statistical Analysis Plan under separate cover, received by Ohio EPA on July 7, 2010. Ohio EPA will review that information and submit a separate correspondence to the owner/operator. However, it is expected the revisions will help keep Comment 3 from reoccurring during semiannual sampling events.

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Statement

4. The City of Rossford has adequately responded to Comment 2 in Ohio EPA's letter dated May 19, 2010.

If you have any questions please feel free to contact Pete Sokoloski at the Ohio EPA Northwest District Office (419-373-4100). 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, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

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pc: Kristin Tillison, Wood County Health Department
William Petruzzi, Hull & Associates, Inc.
Pete Sokoloski, DDAGW, NWDO

~~File: Wood County Wales Road Landfill Ground Water~~

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