



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Wales Road Landfill
Ground Water

March 6, 2008

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

Dear Mr. Ciecka:

On August 27, 2007, Ohio Environmental Protection Agency (Ohio EPA), Northwest District Office (NWDO) received the Statistical Report of Ground Water Quality for the June 2007, sampling event at the City of Rossford - Wales Road Landfill (Facility). The report, dated August 2007, was reviewed to verify 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)(6), which requires the owner/operator to submit to Ohio EPA any changes to the statistical method. Submission of the revised statistical method must occur thirty days prior to submitting to Ohio EPA the first set of ground water analytical data analyzed using the revised statistical method.**

At the time that the August 2007, report was submitted, the facility's current Statistical Monitoring Plan was dated November 1995. Ohio EPA noted significant differences between the November 1995, Statistical Plan and the statistics applied for the analysis of ground water at the facility.

The owner/operator has addressed this violation by submittal of a revised Statistical Plan, received by Ohio EPA on February 22, 2008. Any comments Ohio EPA may have regarding the revised Statistical Plan will be provided in a future correspondence.

2. **The owner/operator is in violation of OAC rule 3745-27-10(C)(8), which requires the owner/operator to determine whether or not there is a statistically significant increase over background for each parameter or constituent required to be statistically analyzed within the ground water monitoring program.**

In the future, to prevent additional violations the owner/operator must determine whether or not a statistically significant increase over background has occurred for all parameters required to be statistically analyzed.

The owner/operator did not perform statistical analysis for chloride at MW-12RT for the June 2007, sampling event. The reason cited was a relative percent difference (RPD) of greater than 20 percent between the initial and duplicate samples. In the future, statistical analysis must be performed on all required parameters.

3. **The owner/operator continues to be in violation of OAC Rule 3745-27-10(E)(6), which requires a determination of rate, extent, and concentration of contaminants. This includes portions of the contaminant plume that exist beyond the facility boundary, unless the owner/operator demonstrates to the director that, despite the owner's/operator's best efforts, the owner/operator is unable to obtain the necessary permission to undertake such action. At a minimum, the owner/operator must submit a copy of their written access request and if a response is provided, a copy of the written statement from the off-site property owner(s) indicating that off-site access is denied.**

This violation was originally cited in a letter to the owner/operator dated April 17, 2006. To date the owner/operator has not responded.

More Information Needed to Determine Compliance

4. **Compliance with OAC Rule 3745-27-10(C)(7)(e), which requires that any Practical Quantitation Limit (PQL) used in a statistical method be the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility, can not be determined at this time. To allow for an evaluation of compliance with the requirements of OAC Rule 3745-27-10(C)(7)(e), the owner/operator needs to do one of the following:**
 - **Lower the laboratory PQLs of the constituents noted in the table below to a level which is deemed as commonly achievable;**

OR

 - **Demonstrate how the current PQLs represent the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy during routine laboratory operating conditions.**

All necessary documentation to determine compliance with OAC Rule 3745-27-10(C)(7)(e) must be submitted to Ohio EPA.

For the June 2007, semi-annual sampling event, several constituents were analyzed using PQLs which are above levels that are commonly achievable (by laboratories doing business in Ohio). The following table summarizes the PQLs that were used for these constituents in comparison to commonly achievable PQLs. The explicit form and content of a justification demonstration has not been established allowing for site-specific flexibility. Ohio EPA envisions that any demonstration submitted would include a discussion of the possible factors and influences surrounding the necessity for a PQL above levels that are commonly achievable. Such a demonstration justifying a higher PQL should include, at a minimum, the name of the constituent, facility-specific PQL value proposed, laboratory QA/QC data, and documentation of site-specific ground water quality conditions that prevent the laboratory from having a PQL that is commonly achievable.

Constituent	units	Owner/Operator's June 2007 PQL	Commonly Achievable or "Target PQL"
Arsenic	mg/l	0.005	0.003
Acrylonitrile	ug/l	50.0	5
Bromomethane	ug/l	5.0	1
2-Butanone	ug/l	12.5	10
Chloromethane	ug/l	5.0	1
Methylene Chloride	ug/l	5.0	2
4-Methyl-2-pentanone	ug/l	12.5	10
1,2,3-Trichloropropane	ug/l	5.0	1

5. **Compliance with OAC Rule 3745-27-10(C)(7)(e), which requires that any Practical Quantitation Limit (PQL) used in a statistical method be the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy during routine laboratory operating conditions that are available to the facility can not be determined at this time for the parameter zinc at MW-1B, MW-2B (in assessment monitoring), MW-3BR, MW-11BR, and MW-12BR. To allow for an evaluation of compliance with the requirements of OAC Rule 3745-27-10(C)(7)(e), the owner/operator needs to do one of the following:**
- **Demonstrate that the PQL value of 0.05 mg/l for zinc used in background for the wells listed above represents the lowest concentration level that can be reliably achieved within the specified limits of precision and accuracy during routine laboratory operating conditions at the time of analysis;**
 - **Re-quantify the PQL values for zinc that do not meet the requirements of 3745-27-10(C)(7)(e) (i.e., 0.05 mg/l) to a level at or below that which is deemed as commonly achievable (0.02 mg/l);**

OR

- Exclude the 0.05 mg/l PQL values for zinc from background for purposes of statistical analysis.

All necessary documentation to determine compliance with OAC Rule 3745-27-10(C)(7)(e) needs to be submitted to Ohio EPA. If the zinc background concentration of 0.05 mg/l is to be re-quantified or excluded the owner/operator will need to perform statistical analysis for the referenced wells using background data that meet the requirements of OAC Rule 3745-27-10(C)(7)(e).

According to the laboratory summary tables for MW-1B, MW-2B (in assessment monitoring), MW-3BR, MW-11BR, and MW-12BR the background data for zinc from approximately June 2003, through June 2006, contains PQL values of 0.05 mg/l. Prior to June of 2003, the laboratory used a PQL for zinc of 0.02 mg/l and since November 2006, the PQL value for zinc has been lowered to 0.004 mg/l. Typically, as a ground water monitoring program progresses, the PQL values will decrease due to upgrades in technology and/or equipment, etc. Therefore, the zinc PQL value of 0.05 mg/l in the statistical background data sets need to be justified as being the lowest reliably achieved within the specified limits of precision and accuracy during routine laboratory operating conditions that were available to the facility during that time period.

If you have any questions please contact Chad Zajkowski at the Ohio EPA, Northwest District Office, Division of Drinking and Ground Waters, at (419) 373-3097. 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

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pc: Jim Konopinski, Wood County Health Department
William Petrucci, Hull & Associates, Inc.
Chad Zajkowski, DDAGW, NWDO
~~File: Wood County, Wales Road Landfill, Ground Water~~
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