



State of Ohio Environmental Protection Agency

**Northwest District Office**

347 North Dunbridge Road  
Bowling Green, OH 43402-9398

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

Re: Evergreen RDF, Wood County  
Ground Water

July 19, 2007

Mr. Steve Lonneman, District Manager  
Evergreen Recycling and Disposal Facility  
2625 East Broadway  
Northwood, Ohio 43619

Dear Mr. Lonneman:

On May 29, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO) received the March 2007 background ground water quality results for monitoring well MW-18R (Report) for the Evergreen Recycling and Disposal Facility in Wood County. The cover letter that accompanied the Report was dated May 25, 2007. The Report was reviewed to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-10.

**COMMENTS**

**Violation**

1. OAC Rule 3745-27-10(C)(g): The owner/operator is in violation of OAC Rule 3745-27-10(C)(g) requiring that **"The data and accompanying text required to be submitted...shall consist of, at a minimum, the following: ... A description of the analysis methods used including the method detection limits..."** Waste Management's May 25, 2007 submittal of the background sampling results for MW-18R did not contain the required analytical Method Detection Limits (MDLs). In order to correct this violation, the owner/operator must submit the analytical MDLs for the MW-18R sample results collected March 14, 2007.

**Statement**

2. Ohio EPA is in receipt of Waste Management's letter dated June 6, 2007, regarding Ohio EPA's issuance of Guidance Document #406. Guidance Document #406 provides guidance for the use and interpretation of Practical Quantitation Limits (PQLs) as statistical limits in accordance with paragraph (C)(7)(e) of rule 3745-27-10 of the Ohio Administrative Code.

Mr. Steve Lonneman, District Manager

July 19, 2007

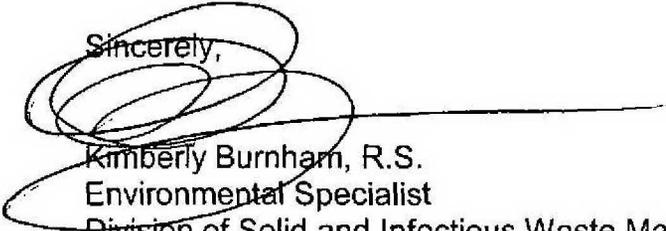
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The target PQLs listed in the guidance represent one option available to the owner or operator of a facility for establishing PQLs that comply with OAC rule 3745-27-10(C)(7)(e). The target PQLs were developed from a review of ground water monitoring data from solid waste facilities and laboratories that do business in Ohio. Ohio EPA has determined that if the ground water analytical data have been analyzed using PQLs that are equal to or less than the target values listed in the guidance, then compliance with OAC rule 3745-27-10(C)(7)(e) has been achieved. Currently, WM reports 43 PQLs that exceed the target PQLs listed in Ohio EPA Guidance Document #406. In the June 6, 2007 letter, Waste Management discusses their approach in developing their "inter-laboratory" PQLs, requests clarification regarding the guidance, and lists other PQL issues.

Ohio EPA is reviewing the June 6, 2007, letter and will be providing a response. Compliance issues with respect to OAC rule 3745-27-10(C)(7)(e) for the March 2007 background sampling event at MW-18R, if any, will be addressed after review of the June 6, 2007 letter is completed.

If you have any questions please contact Chad Zajkowski at the Ohio EPA Northwest District Office (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 Burnham, R.S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

/llr

pc: James Konopinski, Wood County Health Department  
Chad Zajkowski, DDAGW, NWDO  
Allan Razem, Eagon & Associates, Inc.  
Pat Bacon, City of Northwood  
(File: Wood County, Evergreen RDF, Ground Water)  
ec: Scott Heidenreich, DSIWM, CO  
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id: 5-6977