



State of Ohio Environmental Protection Agency

Northwest District Office

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

Re: Wood County Landfill
Ground Water

December 13, 2007

Wood County Board of Commissioners
One Courthouse Square
Bowling Green, Ohio 43402

Dear Commissioners:

On November 30, 2007, the Ohio Environmental Protection Agency (Ohio EPA), Division of Solid and Infectious Waste Management (DSIWM), Northwest District Office (NWDO), received a letter dated November 28, 2007 that is intended as a response to Ohio EPA letters dated August 24 and August 28, 2007 regarding the Wood County Landfill (Facility) located in Wood County. The submittal was reviewed to determine compliance with Ohio Administrative Code (OAC) Rule 3745-27-10.

COMMENTS

Owner/Operator's Response to Previously Cited Violations

1. **The owner/operator will remain in violation of OAC Rule 3745-27-10(B)(3)(e) until the necessary maintenance is performed. The August 28, 2007 letter from Ohio EPA cited the owner/operator in violation of this rule because some of the monitoring wells were not being operated/maintained to design specifications. The owner/operator has indicated its intentions to perform the necessary maintenance to the wells in the future. However, the cited violation will continue until the necessary maintenance is performed.**

As noted in the August 28, 2007 letter from Ohio EPA, the concrete pads at MWS-7, MWR-2 and MWR-3 were not visible during the August 13, 2007 ground water inspection. Further, MWR-3 appeared to have been struck by something (such as heavy equipment) as the steel protective casing was bent and the steel protective casing could not be properly secured. The submittal indicates that the required maintenance for these wells will be performed prior to the next sampling event.

More Information Needed to Determine Compliance

2. **Compliance with OAC Rule 3745-27-10(C)(2)(h), requiring that the Sampling**

& Analysis Plan (SAP) include a detailed description of well maintenance problems and the process to assure that necessary maintenance is performed, cannot be determined at this time. The owner/operator attempted to address this issue in the submittal. However, the owner/operator's response was inadequate to address the issue. The Ground Water Detection Monitoring Plan (GWDMP) needs to be revised accordingly.

As stated previously in the August 28, 2007 letter from Ohio EPA, "The GWDMP states that the monitoring wells will be inspected during the ground water sampling events and that necessary maintenance will be performed. The GWDMP also includes a copy of the field data sheets which are used during ground water sampling events at the facility. These field data sheets include a space to document the general condition of the monitoring wells. However, the GWDMP does not include specific documentation of the procedures that are to be used for the identification of well maintenance problems (i.e., what conditions constitute problems) and does not document the procedures that are to be used to assure that any necessary maintenance is performed in a timely manner (i.e., reporting, timelines and personnel involved)."

In response to this comment, the submittal states "According to the DMSAP...maintenance or repairs will be completed if a monitoring well is reported to be damaged or performing below design specifications. All well maintenance activities are documented in the annual report for the facility. This adequately describes the procedures for identification of well maintenance problems and the performance of necessary maintenance; therefore, revisions to the DMSAP are not necessary."

However, as stated previously, the GWDMP does not include specific documentation of the procedures that are to be used for the identification of well maintenance problems (i.e., what conditions constitute problems) and does not document the procedures that are to be used to assure that any necessary maintenance is performed in a timely manner (i.e., reporting, timelines and personnel involved) [emphasis added]. This detailed information needs to be documented in the GWDMP to meet the requirements of OAC Rule 3745-27-10(C)(2)(h).

3. **Compliance with OAC Rules 3745-27-10(C)(1) and (C)(2)(d), requiring that the ground water monitoring program include consistent sampling and analysis procedures that are designed to ensure monitoring results that provide an accurate representation of ground water quality and that the procedures for the performance of field analysis be documented within the GWDMP, cannot be determined at this time. The owner/operator attempted to address this issue in the submittal by revising the GWDMP. However, the revised GWDMP is in error and needs to be revised accordingly.**

The August 28, 2007 letter from Ohio EPA stated that Ohio EPA concurred with the field stabilization criteria documented in the GWDMP for low-flow purging, but stated that the field stabilization criteria for volumetric purging needed to be revised (to match the procedures for low-flow purging).

In response, the submittal states "*...the DMSAP has been revised to clarify the procedures related to field parameter stabilization criteria for volumetric and low flow purging as required by Ohio EPA.*"

However, while the GWDMP was revised, it was not revised as required by Ohio EPA. First, the volumetric purging procedures were not revised to match the procedures for low-flow purging. Secondly, the low-flow purging procedures in the GWDMP (which had been acceptable) were revised and are no longer adequate.

Therefore, to assure compliance with OAC Rules 3745-27-10(C)(1) and (C)(2)(d) in the future, the owner/operator needs to do one of the following:

- Revise the GWDMP to document the field parameter stabilization criteria of ± 0.1 S.U. for pH, $\pm 3\%$ for conductivity and 0.5°C for temperature noted over three consecutive measurements; or
- Demonstrate to Ohio EPA how the current field parameter stabilization criteria for volumetric purging meet the requirements of OAC Rule 3745-27-10(C)(1).

Statements

4. **All issues of the August 24, 2007 letter from Ohio EPA have been adequately addressed. Some issues of the August 28, 2007 letter from Ohio EPA have been adequately addressed, while others remain outstanding and are documented in Comments No. 1, 2 and 3 above.**

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The August 24, 2007 letter from Ohio EPA contained three (3) comments regarding the February 2007 sampling event at the facility. Comments No. 1 and 2 of the August 24, 2007 letter were adequately addressed by the submittal. Comment No. 2 of the August 24, 2007 letter was previously addressed by the owner/operator.

The August 28, 2007 letter from Ohio EPA contained ten (10) comments regarding the August 13, 2007 ground water inspection at the facility. Comment No. 4 of the August 28, 2007 letter was adequately addressed by the submittal. Comments No. 5-10 of the August 28, 2007 letter did not require a response. Issues regarding Comments No. 1, 2 and 3 of the August 28, 2007 letter remain outstanding (as documented in Comments No. 1, 2 and 3 above).

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

/lb

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Ken Vollmar, Wood County Landfill
William Petruzzi, Hull & Associates, Inc.
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