



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

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

Re: Response to Owner/Operator
Response to Comments.
County Environmental of Wyandot

April 30, 2009

Mr. Randy Traub
County Environmental of Wyandot
11164 County Highway 4
Carey, Ohio 43316-9750

Dear Mr. Traub:

The Ohio Environmental Protection Agency (Ohio EPA) has completed a review of the Response to Ohio EPA Comments, dated March 17, 2009, and received March 18, 2009. The submittal documented the owner/operator's response to the March 6, 2009, comment letter from Ohio EPA which regarded the November 2008, ground water sampling event for the facility. The submittal was reviewed to determine compliance with OAC Rule 3745-27-10.

COMMENTS

Owner/Operator's Response to Previously Cited Violations

1. **The March 6, 2009, letter cited the owner/operator in violation of OAC Rule 3745-27-10(C)(1)(a) regarding adherence to the SAP for stabilization of field parameters during ground water purging. In response to this citation, the submittal from Eagon & Associates stated that this citation was incorrect and that the violation needs to be rescinded. After further review of this issue, Ohio EPA agrees that this violation did not occur and should not have been cited. Therefore, the violation of OAC Rule 3745-27-10(C)(1)(a) cited in the March 6, 2009, letter from Ohio EPA is rescinded.**

The March 6, 2009, letter from Ohio EPA stated *"The SAP that is part of both the Ground Water Detection Monitoring Plan (GWDMP) and Ground Water Quality Assessment Plan (GWQAP) documents that during well purging, 'Stabilization will be considered achieved and purging will be considered complete when each of the following criteria have been met:...three consecutive pH measurements vary by 0.1 S.U. or less...'*

However, this water quality stability standard was not achieved during the purging of BW-1, BW-4, RW-9 and RW-12. Therefore, the requirements of OAC Rule 3745-27-10(C)(1)(a) were not met for the November 2008, annual sampling event."

In response, the submittal states "Because of the natural characteristics of the ground water at Wyandot landfill, pH does not stabilize in some of the wells. This condition is accounted for in the current [GWDMP]. The plan has the following language....'...if pH has not stabilized, but depth to water, specific conductance, and temperature measurements have met their respective stabilization criterion, and one or more optional parameters, including DO, ORP, or turbidity stabilize to within 0.3 milligrams per liter, 10 millivolts, or 10 percent (when >10 NTU) or sustain less than 10 NTU, respectively, for three consecutive readings, then purging will be considered complete without pH stabilization."

Regarding this, the submittal stated "Because of the difficulty in obtaining stabilization with pH, additional readings of dissolved oxygen and oxidation reduction potential are obtained and recorded on the field information form. For BW-1, BW-4, RW-9 and RW-12 stabilization was achieved for these additional parameters...Therefore, the procedures specified in the current GWDMP were followed for the 2008 2nd semiannual sampling event, and there was no violation of OAC Rule 3745-27-10(C)(1)(a)". Ohio EPA concurs.

Statements

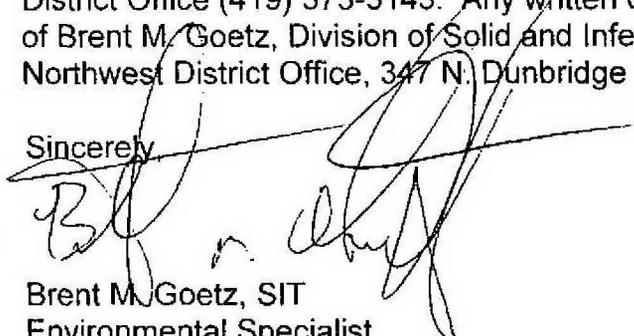
- 2. All issues of the March 6, 2009, letter from Ohio EPA have been adequately addressed.**

The March 6, 2009, letter from Ohio EPA contained three (3) comments regarding the November 2008, ground water sampling event for the facility. As detailed in Comment No. 1 above, Comment No. 1 of the March 6, 2009, letter from Ohio EPA was adequately addressed by the March 17, 2009, submittal from Eagon & Associates, Inc. Comments No. 2 and 3 of the March 6, 2009, letter from Ohio EPA did not require a response.

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If you have any questions please feel free to contact Ken Brock at the Ohio EPA Northwest District Office (419) 373-3143. Any written correspondence should be sent to the attention of Brent M. 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, SIT
Environmental Specialist
Division of Solid and Infectious Waste Management

/llr

pc: Jeff Richey, Wyandot County Health Department
Tom Jenkins, Eagon and Associates
Joe Montello, Republic Services
DSIWM-NWDO File: Wyandot Co., County Environmental of Wyandot, GW :

ec: Ken Brock, DDAGW-NWDO
Jack Leow, DDAGW-NWDO, 5-8391
Mike Reiser, DSIWM-NWDO