



State of Ohio Environmental Protection Agency

Northwest District Office

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Bowling Green, OH 43402-9398

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

Re: Statistical Report of Groundwater Quality
County Environmental of Wyandot

March 6, 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) completed a review of the statistical report of ground water quality for the November 2008, sampling event for the County Environmental Landfill. The submittal was dated January 23, 2009 and received January 26, 2009. Following are Ohio EPA comments relating to the review.

COMMENTS

Violations

1. **The owner/operator is in violation of OAC Rule 3745-27-10(C)(1)(a), requiring the Sampling & Analysis Plan (SAP) to document the sampling and analysis procedures that shall be utilized in the ground water monitoring program. To meet the requirements of this rule in the future, all procedures prescribed by the SAP need to be followed.**

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.

Statements

2. **The owner/operator has until June 8, 2009 to either receive approval of a demonstration according to OAC Rule 3745-27-10(D)(7)(c)(ii) for statistically significant increases at BW-4, RW-10 and RW-11 or implement assessment monitoring for these wells.**

During the November 10-12, 2008 annual sampling event, statistically significant increases were noted for the following:

- BW-4 for chromium;
- RW-10 for potassium; and
- RW-11 for ammonia and copper.

The submittal states that a demonstration in accordance with Ohio Administrative Code (OAC) 3745-27-10(D)(7)(c)(ii) for these statistically significant increases will be submitted to Ohio EPA under separate cover.

OAC Rule 3745-27-10(D)(7)(c)(ii) states "*...If the owner or operator does not obtain approval to continue detection monitoring within two hundred and ten days from initial sampling, the owner or operator shall comply with the provisions of paragraph (E) of this rule.*"

Therefore, if the owner/operator either does not seek approval to continue detection monitoring for these statistically significant increases or does not receive approval from the Director to continue detection monitoring at all of these wells by June 8, 2009 (210 days after November 10, 2008 initiation of sampling event), then the owner/operator will be required to implement a ground water quality assessment monitoring program for the appropriate well(s) by June 8, 2009.

3. **As a corrective measure, waste in the Closed Landfill is being relocated to the BAT portions of the facility. Since the corrective measures program was implemented at the facility, the ground water quality at the impacted wells has generally not worsened, and appears to have improved at several wells.**

The submittal documents that the ground water flow rate for the uppermost aquifer system was calculated to be 0.03 feet/day (11 feet/year) and the flow rate for the significant saturated zone was calculated to be 0.09 feet/day (32.9 feet/year).

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In the past, the ground water in the corrective measures area had been impacted by concentrations of various volatile organic compounds (VOCs), metals and other inorganic constituents. The extent of the ground water contamination in both water bearing zones appears to be limited to the east side of the Closed Landfill (between the landfill and Little Tymochtee Creek). The ground water in both water bearing zones is believed to discharge into Little Tymochtee Creek.

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

/lb

pc: Jeff Richey, Wyandot County Health Department
Tom Jenkins, Eagon and Associates
Joe Montello, Allied Waste
~~File: Wyandot Co., County Environmental of Wyandot, GW~~

ec: Ken Brock, DDAGW-NWDO
Jack Leow, DDAGW-NWDO, 5-8318
Mike Reiser, DSIWM-NWDO