



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: Seneca County
Sunny Farms Landfill
Ground Water

November 27, 2007

Mr. Michael Holmes
Regus Industries, LLC
2730 Transit Road
West Seneca, New York 14224

Dear Mr. Holmes:

The Sunny Farms Landfill is located in Loudon Township, Seneca County, Ohio. The solid waste ID number is 74-00-02. Seven wells are in assessment monitoring. Sixteen wells are in detection monitoring. Based on Ohio Environmental Protection Agency's (Ohio EPA's) evaluation, the facility is presently operating under the correct ground water monitoring phases, the well system is adequate for detection monitoring and the owner/operator should continue to monitor under the current program. Ohio EPA reviewed the report dated October 2007 (received October 23, 2007) in order to determine compliance with OAC Rule 3745-27-10. The report contained a demonstration according to OAC Rule 3745-27-10(D)(7)(c)(ii) that has been reviewed and will be addressed under a separate cover.

COMMENTS

VIOLATIONS

1. **Ohio Administrative Code (OAC) Rule 3745-27-10(C)(10). The owner/operator is in violation of OAC Rule 3745-27-10(C)(10); requiring sample analysis and statistical analysis results generated in accordance with paragraphs (B), (C), (D), (E) and (F) of the rule shall be submitted to Ohio EPA not later than seventy-five days after sampling the well. In order to be in compliance with this rule for future sampling events, the owner/operator needs to submit sample analysis and statistical analysis results within 75 days of collecting samples from the wells.**

The owner/operator collected the ground water samples on May 15-17, 2007. The results should have been submitted by July 29, 2007. The results were received on October 29, 2007.

2. **OAC Rule 3745-27-10(C)(1)(a). The owner/operator is in violation of OAC Rule 3745-27-10(C)(1)(a) requiring use of the procedures documented within the sampling and analysis plan. The owner/operator should purge the monitoring wells until the field parameters have stabilized according to the Groundwater Detection Monitoring Plan (GWDMP) in all future sampling events.**

According to the November 2006, and the September 2007, revisions of the GWDMP, "Four field parameters (pH, specific conductance, temperature, and turbidity) and the depth-to-water shall be measured and the results recorded during purging.

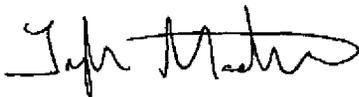
Field reading shall be measured and recorded at least three to five minutes apart. ... Sampling will proceed when drawdown has stabilized and the following stabilization criteria have been met for the four measured field parameters over three successive readings (collected after drawdown has stabilized): ph- ± 0.1 standard units; specific conductance- ± 3 percent; temperature - ± 0.5 degrees Celsius; and turbidity - ± 10 percent (when greater than 10 nephelometric turbidity units [NTU]) or maintained at less than 10 NTUs.

According to the Groundwater Monitoring Well Record Forms the following parameter/well combinations did not meet the stabilization requirements for field parameters:

Well	Parameter	Difference
MP10A	Specific conductance	4.2%
MP1B	Turbidity	36%
MP7B	Turbidity	42%
MP10B	Temperature	0.8 degrees Celsius
MP12B	Turbidity	20%
MP18B	Turbidity	195%

If you have any questions please contact Jack Leow at the Ohio EPA, Northwest District Office, Division of Drinking and Ground Waters, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402. Submit all reports/data to Tyler Madeker, Ohio EPA, Northwest District Office, Division of Solid and Infectious Waste Management, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402.

Sincerely,



Tyler Madeker S.I.T.
Environmental Specialist
Division of Solid and Infectious Waste Management

/llr

pc: John Walker, Sunny Farms Landfill, LLC
Nicki Rumschlag, Seneca County Health Department
Eric Van Heyde, Civil & Environmental Consultants
Carl Mussenden, DSIWM, CO
NWDO File: Seneca County, Sunny Farms Landfill, Groundwater
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