



State of Ohio Environmental Protection Agency

Northwest District Office

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

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.state.oh.us

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

Re: Seneca County
Sunny Farms Landfill
Ground Water

March 13, 2007

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

Dear Mr. Holmes:

The Ohio Environmental Protection Agency (Ohio EPA) has reviewed the following documents for Sunny Farms Landfill:

- letter dated November 10, 2006 **5-6556** (response to 5999, 6040),
- revised Groundwater Detection Monitoring Plan dated November 2006 **5-6558**,
- revised Groundwater Quality Assessment Plan Dated November 2006 **5-6557**.

These documents were received by Ohio EPA on November 13, 2006.

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 EPA's evaluation, the facility is presently operating under the correct ground water monitoring phases, the well system is adequate for the detection monitoring and the owner/operator should continue to monitor under the current program. Ohio EPA reviewed the above referenced documents in order to determine compliance with OAC Rule 3745-27-10.

The owner/operator has adequately addressed seven of seventeen remaining violations (three of these violations are historical that cannot be corrected).

The owner/operator has submitted sufficient information for More Information Needed to Determine Compliance comments to avert ten additional violations.

The Revised Groundwater Detection Monitoring Plan Dated November 2006 **5-6558**, and the Revised Groundwater Quality Assessment Plan Dated November 2006 **5-6557** (all received November 13, 2006) were not signed and certified by a qualified ground water scientist and were not notarized as required by OAC Rule 3745-27-09(H)(2) and 10(A)(5).

COMMENTS

The following comments are in reference to three documents received by the Ohio EPA, NWDO on November 13, 2006. The three (3) documents are designated **I-III**

I. OHIO EPA LETTER DATED NOVEMBER 10, 2006 (5-6556)

This letter was sent in response to two Ohio EPA letters 5-5999 and 5-6040

OHIO EPA LETTER DATED AUGUST 18, 2006 (5-5999)

EVALUATION OF RESPONSES TO PREVIOUSLY CITED VIOLATIONS

1. **OAC Rule 3745-27-10(C)(1)(a): The owner/operator continues to be in violation of OAC Rule 3745-27-10(C)(1)(a), ...**

The owner/operator has adequately addressed this violation.

MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE

2. **OAC Rule 3745-27-10(C)(1): Compliance with OAC Rule 3745-27-10(C)(1) cannot be determined at this time...**

The owner/operator has submitted sufficient information to avert a violation.

OHIO EPA LETTER DATED AUGUST 18, 2006 (5-6040)

This Ohio EPA letter contained comments concerning eight (8) letters from the owner/operator. To make the review easier the letters from the owner/operator have been designated as **A - H**.

A. OEPA ID 5-5477 DATED OCTOBER 31, 2005

EVALUATION OF RESPONSES TO PREVIOUSLY CITED VIOLATIONS

2. **OAC Rule 3745-27-10(E)(5)(c): The owner/operator is in violation of OAC Rule 3745-27-10(E)(5)(c), requiring, ..., the owner or operator shall place a notice in the operating record identifying all constituents, that have been detected....**

The owner/operator has added arsenic to the list of waste derived constituents and has adequately addressed the violation.

The response states "Data reported for a duplicated sample is not required to be statistically evaluated as part of the groundwater quality assessment monitoring program at the facility. Sample results from a duplicate sample are intended to be used for quality assurance only."

As stated in the August 18 , 2006 Ohio EPA letter for this comment **The "sample" and the "duplicate" are all part of the same sample.**

3. **The owner/operator is in violation of OAC Rule 3745-27-10(E)(6)(a), requiring: A determination of rate, extent, and concentration....**

According to the response, "...In the event the adjacent property owners respond and grant access, additional investigation will be conducted to determine..."

The response does not address the determination of rate, extent, and concentration on site downgradient to the north of the landfill. Until the owner/operator conducts further investigation on site the violation will remain.

Additional Violations

The owner/operator is in violation of the following rules, OAC Rule 3745-27-10(C)(6), ...OAC Rule 3745-27-10(A), ...and OAC Rule 3745-27-10(E)(6)(a) ...

The owner/operator has adequately addressed the violation of OAC Rules 3745-27-10(C)(6) and (A) by revising the ground water quality assessment plan (GWQAP) in November 2006. To avoid violations of OAC 3745-27-10(C)(6), and (A) for future sampling events, the owner/operator should follow the revised GWQAP and utilizing statistical limits equal to or below PQLs.

The owner/operator remains in violation of OAC 3745-27-10(E)(6)(a) for not making a first determination of rate, extent and concentration as stated in other letters.

EVALUATION OF PREVIOUSLY CITED VIOLATIONS

1. The owner/operator has adequately addressed the violation of Ohio Administrative Code (OAC) Rule 3745-27-10(C)(7)(e) as described below. As a result of the updating of the background data set, compliance with OAC Rule 3745-27-10(C)(4), (B)(3), and (C)(7)(f) cannot be determined. Note that this comment is being made by Ohio EPA prior to completing a thorough review of the reports received concerning the November 2006 sampling event.

OAC Rule 3745-27-10(C)(7)(e): The owner/operator is in violation of OAC Rule 3745-27-10(C)(7)(e), requiring: ...Any practical quantitation limit (PQL) used in the statistical method shall be the lowest concentration ...

The owner/operator has removed the data with the higher PQLs and has adequately addressed the violation of OAC Rule 3745-27-10(C)(7)(e).

According to OAC Rule 3745-27-10(C)(7)(f): If necessary, the statistical method shall include procedures to control or correct for seasonal and spatial variability as well as temporal correlation in the data.

In updating of the background data set there now appears to be spatial variability in the data that has been added to the upgradient data set. It does not appear that the owner/operator corrected for the spatial variability before the data was added to the background data set. The owner/operator needs to indicate where in the ground water detection and assessment monitoring plans the corrections for spatial variability are located.

According to OAC Rule 3745-27-10(C)(4): The owner or operator shall establish background ground water quality, unless the exception in paragraph (C)(5) of this rule applies, by analyzing ground water samples collected from hydraulically upgradient wells(s) for each of the monitoring parameters or constituents required in the ground water monitoring program.

According to OAC Rule 3745-27-10(B)(3), All monitoring wells shall be designed, installed, and developed in a manner that allows the collection of ground water samples that are representative of ground water quality in the geologic unit being monitored,

In updating the background data set the owner/operator has added six (6) wells to the upgradient portion of the monitoring system for the significant zone of saturation (SZS); this makes a total of nine (9) wells. The data from the six wells has been added to the background data set.

Three of the wells MP10A, 13A and 15A are currently sidegradient or downgradient; therefore, the data for these three wells cannot be used in the background data set.

Well MP12A was the original upgradient well for the SZS. It was removed from the system based on a letter August 16, 2001 from the owner/operator. The owner/operator has placed it back into the SZS monitoring system as an upgradient well based on the same reasons it was removed, in the first place. The Ohio EPA has reviewed the boring logs, and the ground water quality data for MP12A and the other SZS wells. There are three reasons for not including well MP12A in the SZS monitoring system:

1. Well MP12A is not monitoring a SZS. The boring log for well MP12A shows that from 0 to 29.9 feet the only material observed was clay. The screen and sand pack was installed from 18 to 29.32 feet in dry clay. The screens for the other SZS wells were installed in silty clay to sand; no other well monitors a clay zone.
2. The ground water quality data is drastically different from the other current and proposed upgradient monitoring wells in the SZS. The data for arsenic, barium, beryllium, chromium, cobalt, lead, manganese, nickel, potassium, silver, vanadium, and zinc are significantly higher in well MP12A than any other SZS well. In fact, the only detections of beryllium and silver were in well MP12A.
3. According to a letter dated August 16, 2001 from the owner/operator, **Based on the boring log ... MP-12A is screened at the unconsolidated deposits/ bedrock surface** [according to the boring log the base of the screen/sand pack is 0.58 feet above the interface]. **The unconsolidated deposits at MP-12A consist entirely of clay. The low groundwater yield experienced at MP-12A during each sampling event confirms that the screened interval is within fine-grained silt and clay at this location** [the log for this well only shows clay for the first 29.9 feet this distinctly different from all of the other SZS wells, the geologist on site described it as clay not silty clay, etc.].

Other monitoring wells at the San-Lan Landfill are screened across a thin silt and sand layer just above bedrock [1 well base of screen/sand pack on bedrock, 20 wells base of screen/sand pack 0.44 to 8 feet above bedrock, MP12A 0.68 feet above bedrock]. Groundwater quality at MP-12A has been noticeably different than the other Zone A monitoring wells. Clay particles promote cation exchange, which can often alter the chemistry of groundwater. This may be the reason for the different geochemistry observed at MP-12A.

In order to meet the requirements of ...10(B)(1)(a), a more representative background database must be established so that groundwater quality downgradient of the facility, specifically at assessment monitoring wells MP-2AR and MP-7AR, can be properly evaluated.

The owner/operator will be in violation of OAC Rule 3745-27-10(C)(4) if data from wells that are not hydraulically upgradient of the landfill are used in the background data set. The owner/operator will be in violation of OAC Rule 3745-27-10(C)(7)(f) if the background data was not corrected for spatial variability. The owner/operator will be in violation of OAC Rule 3745-27-10(B)(3) if data from wells that are not designed, installed and developed in a manner that allows for the collection of ground water samples that are representative of ground water quality in the geologic unit being monitored are used in the background data set. The owner/operator should remove all data from wells MP10A, 12A and 13A, and any data for well 15A when it no longer was an upgradient well based on potentiometric surface maps for the significant zone of saturation (this appears to be when waste was placed in phase 2 based on potentiometric surface maps of the SZS).

EVALUATION OF MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE COMMENTS

5. **OAC Rule 3745-27-10(C)(1): Compliance with OAC Rule 3745-27-10(C)(1) cannot be determined at this time.**

The owner/operator utilizes low flow purging with bladder pumps based wholly on stabilization of indicator parameters...

The owner/operator has submitted sufficient information to avert a violation.

B. OEPA ID 5-5478 OCTOBER 31, 2005

EVALUATION OF PREVIOUSLY CITED VIOLATIONS

1. No response necessary.
2. **OAC Rule 3745-27-10(C)(7)(e): ... In the event all background data is reported below the laboratory PQL for an individual parameter, the nonparametric prediction limit is considered to be the highest historical PQL.**

The owner/operator has revised the ground water detection monitoring plan to indicate that if all the values for a parameter are below the PQL, "...the current lowest PQL will be used as the statistical limit.". The owner/operator appears to have adequately addressed the violation.

EVALUATION OF MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE COMMENTS

- 3&5. See the response to comment number 1 on pages 4-6 above.
4. The information submitted was sufficient to avert violations.

C. OEPA ID 5-5295, 5296, 5297 DATED NOVEMBER 1, 2005

Letter dated December 2, 2004

COMMENTS OEPA 5-4076/4145

STATEMENTS

5. No response necessary at this time.

COMMENTS OEPA 5-4211

EVALUATION OF MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE COMMENTS

Mr. Michael Holmes
March 13, 2007
Page 8

12. The information submitted was sufficient to avert a violation.

Ohio EPA Letter Dated January 26, 2005 (5-4799)

RESPONSES TO OHIO EPA COMMENT LETTER ID 5-4461

EVALUATION OF THE OWNER/OPERATOR'S RESPONSE TO PREVIOUSLY CITED VIOLATIONS

2. See the response to comment number 1 on pages 4-6 above..

RESPONSES TO OHIO EPA COMMENT LETTER ID 5-4462

EVALUATION OF THE OWNER/OPERATOR'S RESPONSE TO PREVIOUSLY CITED VIOLATIONS

2. **Previously cited violation number 2. The owner/operator is in violation of OAC Rule 3745-27-10(C)(1) requiring...**

This is a historical violation. The owner/operator has added a section to the plans that addresses how RPDs above 30% will be handled in future sampling events.

4. **Previously cited violation number 4. The owner/operator is in violation of OAC Rule 3745-27-10(C)(6) requiring (see the citation of the rule in comment 3 above).**

The owner/operator has addressed the violation by adding arsenic to the constituents of concern.

- 7&8. **The owner/operator is now in violation of OAC Rule 3745-27-10(E)(6)(a), requiring: A determination of rate, extent, and concentration. The owner or operator shall**

The owner/operator has addressed the violations by adding arsenic to the constituents of concern.

Ohio EPA Letter Dated March 8, 2005 (5-4929)

EVALUATION OF THE OWNER/OPERATOR'S RESPONSE TO PREVIOUSLY CITED VIOLATIONS

5. **Previously cited violation number 5. OAC Rule 3745-27-10(C)(7)(e): The owner/operator is in violation of OAC Rule 3745-27-10(C)(7)(e), requiring: ...**

To avoid this violation in future sampling events, the owner/operator should use the lowest PQL achievable.

See the response to comment number 1 on pages 4-6 above.

MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE

6. See the response to comment number 1 on pages 4-6 above.
7. The owner/operator has submitted information that is sufficient enough to avert a violation.

Ohio EPA Letter Dated March 8, 2005 (5-4930)

EVALUATION OF THE OWNER/OPERATOR'S RESPONSE TO PREVIOUSLY CITED VIOLATIONS

7. The owner/operator is now in violation of OAC Rule 3745-27-10(E)(6)(a), requiring: **A determination of rate, extent, and concentration. The owner or operator shall**

This remains as a violation because the owner/operator has not determined the rate, extent and concentration of arsenic in the ground water.

4. **Previously cited violation number 4. OAC Rule 3745-27-10(C)(1)(a): The owner/operator remains in violation of OAC Rule 3745-27-10(C)(1)(a), requiring (see the Rule citation in comment 3). OAC Rule 3745-27-10(C)(7)(e):...**

OAC 3745-27-10(C)(1). **Compliance with OAC Rule 3745-27-10(C)(1) cannot be determined at this time.**

The owner/operator has revised the arsenic and nickel tolerance limits, but the data base may be in error (See the response to comment number 1 on pages 4-6 above). Until the data base is revised and the tolerance limits are calculated again it cannot be determined whether or not the owner/operator is in violation of OAC Rule 3745-27-10(C)(1).

EVALUATION OF THE OWNER/OPERATOR'S RESPONSE TO MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE COMMENTS

5. OAC Rule 3745-27-10(C)(1): Compliance with OAC Rule 3745-27-10(C)(1) cannot be determined at this time.

The relative percentage differences for nitrate-nitrite is 109%. ...OAC Rule 3745-27-10(C)(1).

The owner/operator should show that there was no field or laboratory error.

According to the November 10, 2006 report, page 12, ...*Essentially, the difference between the nitrate/ nitrite concentrations in MP-2AR and the corresponding duplicate shows that the variability of the groundwater quality can be significant over a short time...Furthermore, the QA provided by American Analytical Laboratories, Inc. (AAL) that was submitted with the November 2004 statistical report indicated that all sample results were within QC limits*"

Based on the information submitted, the laboratory data were acceptable. This indicates that there must have been error in the field procedures. It appears that the ground water had not reached stability during purging based on the owner/operator's statement *Essentially, the difference between the nitrate/ nitrite concentrations in MP-2AR and the corresponding duplicate shows that the variability of the groundwater quality can be significant over a short time*. The owner/operator should make sure that the ground water has been purged sufficiently before collecting the samples.

The owner/operator utilizes low flow purging with bladder pumps based wholly on stabilization of indicator parameters. According to the **Groundwater Monitoring Well Record Forms**, the owner/operator purged less than a screen volume from each well during the sampling round.

If purging is based wholly or partially on stabilization of indicator parameters, at least three measurements (with a variation of no more than 0.1 S.U. for pH, 3% for specific conductance, 0.5°C for temperature and 10% for turbidity between all 3 of the measurements) of the indicator parameters should be used to determine when to terminate purging, and at least one screen volume plus the volume of the drawdown should be purged from the well prior to sampling. In order to meet the requirements of OAC Rule 3745-27-10(C)(1) in all future sampling events, resampling events and verification sampling events the owner/operator needs to remove at least one screen volume plus the volume of the drawdown of ground water during purging before collecting the samples.

Or the owner/operator can conduct a study of each well by purging until stabilization has been achieved in the four field parameters then continue purging until a full screen volume has been purged. After the full screen volume has been purged, the owner/operator needs to conduct a minimum of three additional measurements of the four field parameters to show that the wells have stabilized.

6. **Compliance with OAC Rule 3745-27-10(E)(5)(c) cannot be determined at this time.**

...Arsenic needs to be added to the parameters of concern in order to avoid violations in future sampling events.

The owner/operator has added arsenic to the parameters of concern, this was sufficient to avert a violation.

8. **OAC Rule 3745-27-10(E)(6): Compliance with OAC Rule 3745-27-10(E)(6) cannot be determined at this time.**

The owner/operator's response was sufficient to avert a violation.

9. The owner/operator's response was sufficient to avert a violation .

Comments concerning the groundwater quality assessment plan
Ohio EPA id 5-5297

MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE

1. **OAC 3745-27-10(C)(1). Compliance with OAC Rule 3745-27-10(C)(1) cannot be determined at this time.**

The owner/operator has revised the arsenic and nickel tolerance limits, but the data base may be in error (See the response to comment number 1 on pages 4-6 above). Until the data base is revised and the tolerance limits are calculated again it cannot be determined whether or not the owner/operator may be in violation of OAC Rule 3745-27-10(C)(1).

D. OHIO EPA ID 5-5563, DATED NOVEMBER 4, 2005

The comment was addressed adequately in a previous letter from the owner/operator.

E. OEPA ID 5-5732 DATED FEBRUARY 16, 2006

COMMENTS

EVALUATION OF PREVIOUSLY CITED VIOLATIONS

3. & 4. See the response to comment number 1 on pages 4-6 above.

MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE

7. **OAC Rule 3745-27-10(C)(1) & (10): Compliance with OAC Rule 3745-27-10(C)(1) & (10) cannot be determined at this time. For the (C)(1) rule citation see comment 4.**

The information submitted was sufficient to avert a violation.

F. OEPA ID 5-5768 DATED FEBRUARY 16, 2006

COMMENTS

EVALUATION OF OWNER/OPERATOR RESPONSE TO PREVIOUSLY CITED VIOLATIONS

1. **...The violation should not have been rescinded as stated in the Ohio EPA letter dated November 1, 2005...**

According to the owner/operator, "Base upon the revisions to the background groundwater database, the facility requires additional time to evaluate the current extent of waste-derived constituents before additional wells are installed."

The owner/operator remains in violation of OAC 3745-27-10(E)(6)(a) until the first determination of rate, extent and concentration is submitted to the Ohio EPA.

G. OEPA ID 5-5731 DATED MARCH 22, 2006

COMMENTS

EVALUATION OF THE OWNER/OPERATOR'S RESPONSE TO PREVIOUSLY CITED VIOLATIONS

1. **OAC Rule 3745-27-10(C)(7)(e): The owner/operator continues to be in violation of OAC Rule 3745-27-10(C)(7)(e), requiring:**

...arsenic has a tolerance limit of 49.95 ug/L and nickel has a tolerance limit of 99.9 ug/L.

See the response to comment number 1 on pages 4-6 above.

4. The owner/operator has adequately addressed this violation at this time.

H. OEPA ID 5-5781 DATED MARCH 22, 2006

EVALUATION OF PREVIOUSLY CITED VIOLATIONS

1. No response needed

II. GROUNDWATER DETECTION MONITORING PLAN (GWDMP) REVISED NOVEMBER 2006, 5-6558

MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE

1. OAC Rule 3745-27-10(C)(4): Compliance with OAC Rule 3745-27-10(C)(4) cannot be determined at this time. For the (C)(4) rule citation see comment 1 on pages 3-5.

Mr. Michael Holmes
March 13, 2007
Page 14

In order to prevent violations of OAC Rule 3745-27-10(C)(4), the owner/operator needs to revise: section 2.5 and 2.5.1 on pages 8-12; section 5.2.3 on page 30; Tables 4, 6, 12; and Appendices G, I, and K of the GWDMP based on comment 1 on pages 3-5 above.

STATEMENTS

2. Section 4.5 Data Validation discusses the use of RPDs for data validation. The procedure will be acceptable after the owner/operator conducts a study of all the wells as to when each one reaches stability (see comment 5 on page 9 above).

III. GROUNDWATER QUALITY ASSESSMENT PLAN (GWQAP) REVISED NOVEMBER 2006, 5-6557

VIOLATIONS

1. The owner/operator remains in violation of OAC Rule 3745-27-10(E)(6)(a) requiring: **A determination of rate, extent, and concentration... at a minimum, determines the following: (a) The rate and extent of migration of the waste-derived constituents in the ground water.**

According to an Ohio EPA letter dated December 14, 2006, **The corrective measures plan (CMP) cannot be reviewed because the ground water quality assessment is not complete. It appears from the information submitted that the contamination has extended offsite and beyond the assessment wells to the north and east, and west from the landfill. The CMP cannot be considered as the first submittal of the CMP. The report will be placed in the files as a public document.**

The owner/operator has not submitted a revised first determination of rate, extent and concentration. The original submittal dated March 2004 did not contain a determination of the rate, extent and concentration of contamination directly downgradient, to the north of cell/phase 1 of the landfill.

Mr. Michael Holmes
March 13, 2007
Page 15

The owner/operator was informed in letters dated June 4, 2004 (4076), December 6, 2004 (4547), March 24, 2005 (4930) and March 22, 2006 (5731) that there was a violation for not determining the full extent of the contamination according to OAC 3745-27-10(E)(6)(a). The owner/operator has not adequately addressed the violation at this point in time.

In order to come into compliance with OAC Rule 3745-27-10(E)(6)(a), the owner/operator needs to install wells directly north of cell/phase 1 of the landfill downgradient of existing monitoring wells MP20A and MP26A to determine the rate, extent (also laterally east and west of MP20A and west of 26A) and concentration of the contamination and submit the report required by OAC Rule 3745-27-10(E)(7) within three months of the date of this letter. The placement of wells was discussed in an Ohio EPA letter dated November 1, 2006. The owner/operator needs to submit a revised corrective measures plan within 270 days of the date of this letter to meet the requirements of OAC Rule 3745-27-10(F)(2). The revised corrective measures plan needs to meet all of the requirements of OAC Rule 3745-27-10(F).

MORE INFORMATION NEEDED TO DETERMINE COMPLIANCE

2. OAC Rule 3745-27-10(C)(4): Compliance with OAC Rule 3745-27-10(C)(4) cannot be determined at this time. For the (C)(4) rule citation see comment 1 on pages 3-5.

In order to prevent violations of OAC Rule 3745-27-10(C)(4), the owner/operator needs to revise: section 3.1 and 3.1.1 on pages 9-10; section 3.3 on page 11; section 4.3 on pages 24-26; section 7.2 on page 44; Tables 4, 7, 12; and Appendices G, and I, of the GWQAP based on comment 1 on pages 3-5 above.

STATEMENTS

3. Section 7.9 Data Validation discusses the use of RPDs for data validation. The procedure will be acceptable after the owner/operator conducts a study of all the wells as to when each one reaches stability (see comment 5 on page 9 above).

Mr. Michael Holmes
March 13, 2007
Page 16

If you have any questions please contact Jack Leow, C.P.G., 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 Mary Ann Miller, Ohio EPA, Northwest District Office, Division of Solid and Infectious Waste Management, 347 N. Dunbridge Rd., Bowling Green, Ohio 43402.

Sincerely,



Mary Ann Miller, R.S.
Environmental Specialist
Division of Solid and Infectious Waste Management

/csl

pc: John Walker, Sunny Farms Landfill, LLC
Brendon Pantano, Sunny Farms Landfill, LLC
Nicki Rumschlag, Seneca County Health Department
Michael E. Leone, Burgess & Niple, Inc.
Carl Mussenden, DSIWM, CO
NWDO File: Seneca County, Sunny Farms Landfill, Groundwater

ec: Jack Leow, DDAGW, NWDO
Habib Kaake, DSIWM, NWDO
Carol Norman, DSIWM, NWDO
Mary Ann Miller, DSIWM, NWDO

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