



State of Ohio Environmental Protection Agency

**Southeast District Office**

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

November 5, 2007

**RE: LAWRENCE COUNTY  
FAC - HANGING ROCK LANDFILL  
I.D. 44-00-02**

Mr. Timothy M. Dickens, Manager  
Hanging Rock Landfill Co. Inc.  
P.O. Box 100  
Ironton, Ohio 45638-0100

Dear Mr. Dickens:

**SUBJECT:** October 8, 2007 Letter Response from Hanging Rock Landfill (including revised Statistical Evaluations - Table 1 & Table 2).

Ohio EPA has completed a review of the October 8, 2007, Letter Response and the revised Table 1 & Table 2 Statistical Evaluations for the Hanging Rock Landfill Complex. The letter and revised tables were received by Ohio EPA on October 10, 2007. The letter was written by you, Manager of the Hanging Rock Landfill Company, Inc. Tables 1 & 2 were prepared by R. Bruce Bowers of EScience in Parkville, MO., on behalf of Hanging Rock Landfill. The landfill facility is regulated under residual waste rules OAC 3745-30-08.

The ground water monitoring system at Hanging Rock currently consists of six down gradient detection monitoring wells installed into the Lower Kittanning Sandstone and one valley seep. Hanging Rock recently received approval from Ohio EPA (June 12, 2007) to change the frequency of their Ground Water Detection Monitoring Program from semi-annual to annual. The submission of their most recent Detection Monitoring Statistical Evaluation Report was the first "annual" report received following this approval. Hanging Rock has concluded that waste-derived constituents entered ground water in the vicinity of the regulated disposal cell adjacent to MW-6. Hanging Rock requested, in lieu of entering the Corrective Measures Program, that it enter the Compliance Monitoring Program as allowed by OAC 3745-30-08(E)(7). The Compliance Monitoring Plan for MW-6 is currently being revised to better conform with 3745-30-08(E)(7) and Ohio EPA recommendations. After the last semi-annual sampling event, it was determined that MW-4 statistically triggered for chloride for two consecutive monitoring events as defined by OAC 3745-30-08(D)(8). This will require an Appendix II sampling event, as per OAC 3745-30-08(D)(10)(b)(ii).

Hanging Rock will remain in violation of 3745-30-08(D)(8) through (D)(12) until the agency has received confirmation that the Appendix II sampling of MW-4 has taken place.

(OAC)3745-30-08(D)(8), Hanging Rock failed to notify the agency of the statistically significant determination for chloride at monitoring well MW-4. Hanging Rock must now comply with the requirements of 3745-30-08(D)(8) through (D)(12) as per the schedules stated in the rule.

OAC 3745-30-08(D)(8) If at any monitoring well, the owner or operator determines, for two consecutive semi-annual statistical determination periods, that there has been a statistically significant increase ( or change in the case of ph) from background values for one or more of the applicable indicator parameters specified in Appendix III of this rule according to the statistical method specified by the owner or operator pursuant to

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Hanging Rock Landfill Complex, Lawrence County  
November 5, 2007  
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paragraphs (5), (6), and (d)(9) of this rule, the owner or operator shall notify Ohio EPA not later than fifteen days after receiving the second period's statistical or analytical results which indicate a statistically significant change. The notification must indicate which parameters have shown a statistically significant change from background levels.

This violation was cited by Ohio EPA on September 10, 2007. The above cited rules direct landfill owners or operators to perform Appendix II sampling of detection monitoring wells which statistically trigger for indicator parameters according to 3745-30-08(D)(8).

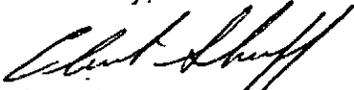
Evaluation of Owner Response to Previously Cited Violation

Ohio EPA has determined that Hanging Rock has returned to compliance with respect to a previous violation of OAC 3745-30-08(C)(1) & (C)(8), issued by Ohio EPA on September 10, 2007.

Ohio EPA's citation concerned the unauthorized reporting of Compliance Monitoring results for MW-6 (prior to Plan approval by the Agency), as per OAC 3745-30-08(C)(1) & (C)(8). These rules require owners and operators of landfill facilities to use the methods documented in their sampling and analysis plans, and then report their ground water data in the appropriate form as specified by the director. With the submission of revised statistical evaluation tables (Tables 1 & 2), as requested by Ohio EPA, Hanging Rock has properly reported all of its ground water monitoring statistical results, and is no longer in violation of OAC 3745-30-08(C)(1) & (C)(8). Hanging Rock protested the use of a "Violation" regarding the premature reporting of MW-6 compliance monitoring data. However, Hanging Rock states in its recent response letter that in addition to resubmitting its statistical data (revised Tables 1 & 2), it will revise its Ground Water Compliance Monitoring Program for MW-6 by including historic data results for TCE and Ethyl Benzene and providing MCL trigger levels for these two compounds.

If you have any further questions, feel free to contact me at (740) 380-5246 or Steve Saines at 740-380-5445.

Sincerely,



Clint Shuff, R.S.  
Environmental Specialist  
Division of Solid and Infectious Waste Management

CS/jg

cc: Steve Saines, SEDO-DDAGW